BARN GWMPASU:

Prosiect Arfaethedig Efyrnwy Frankton Green GEN

Cyfeirnod yr Achos: EN020035

Mabwysiadwyd gan yr Arolygiaeth Gynllunio (ar ran yr Ysgrifennydd Gwladol) yn unol â Rheoliad 10 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017

04 Mawrth 2024



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1. CYFLWYNIAD

- 1.0.1 Ar 23 Ionawr 2024, cafodd yr Arolygiaeth Gynllunio (yr Arolygiaeth) gais am Farn Gwmpasu gan Green Generation Energy Networks Cymru Ltd (Green GEN Cymru) (yr Ymgeisydd) o dan Reoliad 10 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017 (y Rheoliadau AEA) ar gyfer Prosiect arfaethedig Efyrnwy Frankton Green GEN (y Datblygiad Arfaethedig). Rhoddodd yr Ymgeisydd wybod i'r Ysgrifennydd Gwladol o dan Reoliad 8(1)(b) y rheoliadau hynny ei fod yn bwriadu darparu Datganiad Amgylcheddol mewn perthynas â'r Datblygiad Arfaethedig a, thrwy gyfrwng Rheoliad 6(2)(a), bod y Datblygiad Arfaethedig yn 'Ddatblygiad AEA'.
- 1.0.2 Darparodd yr Ymgeisydd y wybodaeth angenrheidiol i lywio cais o dan Reoliad AEA 10(3) ar ffurf Adroddiad Cwmpasu, sydd ar gael yn:

Adroddiad Cwmpasu (prif destun ac Atodiadau A - C):

 $\frac{\text{http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000015}{\text{constant}}$

Adroddiad Cwmpasu (Atodiad D, Ffigurau 1.1 - 7.10):

http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000016

Adroddiad Cwmpasu (Atodiad D, Ffigurau 8.1 – 10.1):

http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000017

Adroddiad Cwmpasu (Atodiad D, Ffigurau 13.1 - 16.1):

 $\frac{http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000018}{}$

- 1.0.3 Y ddogfen hon yw'r Farn Gwmpasu (y Farn) a fabwysiadwyd gan yr Arolygiaeth ar ran yr Ysgrifennydd Gwladol. Gwneir y Farn hon ar sail y wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu, sy'n adlewyrchu'r Datblygiad Arfaethedig fel y'i disgrifir ar hyn o bryd gan yr Ymgeisydd. Dylai'r Farn hon gael ei darllen ar y cyd ag Adroddiad Cwmpasu'r Ymgeisydd.
- 1.0.4 Mae'r Arolygiaeth wedi amlinellu yn yr adrannau canlynol o'r Farn hon lle y mae wedi cytuno / anghytuno i hepgor agweddau / materion penodol ar sail y wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu. Mae'r Arolygiaeth yn fodlon na ddylai derbyn y Farn Gwmpasu hon atal yr Ymgeisydd rhag cytuno wedi hynny â'r cyrff ymgynghori perthnasol i hepgor y cyfryw agweddau / materion o'r Datganiad Amgylcheddol, lle y darparwyd tystiolaeth ychwanegol i gyfiawnhau'r dull hwn. Fodd bynnag, er mwyn dangos bod yr agweddau / materion wedi derbyn sylw'n briodol, dylai'r Datganiad Amgylcheddol esbonio'r rhesymeg dros eu hepgor a chyfiawnhau'r dull a ddefnyddiwyd.

- 1.0.5 Cyn mabwysiadu'r Farn hon, ymgynghorodd yr Arolygiaeth â'r 'cyrff ymgynghori' a restrir yn Atodiad 1 yn unol â Rheoliad AEA 10(6). Rhoddir rhestr o'r cyrff ymgynghori a ymatebodd o fewn y raddfa amser statudol (ynghyd â chopïau o'u sylwadau) yn Atodiad 2. Mae'r sylwadau hyn wedi cael eu hystyried wrth baratoi'r Farn hon.
- 1.0.6 Mae'r Arolygiaeth wedi cyhoeddi cyfres o nodiadau cyngor ar y wefan Cynllunio Seilwaith Cenedlaethol, gan gynnwys Nodyn Cyngor 7: Asesu Effeithiau Amgylcheddol: Gwybodaeth Amgylcheddol Ragarweiniol, Sgrinio a Chwmpasu (AN7). Mae AN7 a'i atodiadau yn rhoi arweiniad ar brosesau AEA yn ystod y camau cyn-ymgeisio a chyngor i gynorthwyo ymgeiswyr i baratoi eu Datganiad Amgylcheddol.
- 1.0.7 Dylai ymgeiswyr roi sylw penodol i'r cyngor sefydlog yn AN7, ochr yn ochr â nodiadau cyngor eraill ar broses Deddf Cynllunio 2008, sydd ar gael yn:
 - https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/
- 1.0.8 Ni ddylid ystyried bod y Farn hon yn awgrymu bod yr Arolygiaeth yn cytuno â'r wybodaeth neu'r sylwadau a roddwyd gan yr Ymgeisydd yn ei gais am farn gan yr Arolygiaeth. Yn arbennig, ni fydd sylwadau gan yr Arolygiaeth yn y Farn hon yn rhagfarnu unrhyw benderfyniadau diweddarach a wneir (e.e. pan gyflwynir y cais yn ffurfiol) y dylai unrhyw ddatblygiad a amlygwyd gan yr Ymgeisydd gael ei drin o reidrwydd fel rhan o Brosiect Seilwaith o Arwyddocâd Cenedlaethol (NSIP) neu Ddatblygiad Cysylltiedig neu ddatblygiad nad oes arno angen caniatâd datblygu.

2. SYLWADAU TROSFWAOL

2.1 Disgrifiad o'r Datblygiad Arfaethedig

(Pennod 3 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
2.1.1	Pennod 3	Disgrifiad o'r prosiect	Mae'r Adroddiad Cwmpasu yn cyflwyno 'Coridor Adroddiad Cwmpasu' ac ardaloedd chwilio lle y byddai elfennau o'r Datblygiad Arfaethedig yn cael eu lleoli, ac mae'n darparu disgrifiad lefel uchel o'r hyn y byddai'r Datblygiad Arfaethedig yn ei gynnwys. Ar yr adeg hon, nid oed lleoliadau a ddiffiniwyd yn benodol ar gyfer gwaith ac nid oes paramedrau uchder ar gyfer prif elfennau fel yr is-orsaf gasglu a'r cyfadeilad pen selio cebl (CSEC). Mae'r Adroddiad Cwmpasu yn esbonio y bydd tanddaearu (yn hytrach na llinell uwchben (OHL)) yn cael ei ystyried yn yr ardaloedd sy'n fwyaf sensitif i effeithiau ar y dirwedd neu effeithiau gweledol, neu sy'n destun effeithiau ar leoliad asedau treftadaeth, ond mae'n nodi "Ar y cam cynnar hwn yn natblygiad y Prosiect, nid oes modd nodi ble y gellid ystyried bod tanddaearu'n briodol eto".
			Mae'r uchod wedi cyfyngu ar allu'r Arolygiaeth i roi sylwadau ystyrlon yn seiliedig ar y disgrifiad o'r prosiect ar yr adeg hon.
			Dylai'r Datganiad Amgylcheddol roi disgrifiad clir o nodweddion ffisegol pob elfen o'r Datblygiad Arfaethedig, fel y gellir canfod yr effeithiau arwyddocaol tebygol (LSE) o'u hadeiladu a'u gweithredu. Dylai'r Ymgeisydd wneud ymdrech i bennu lleoliad pob elfen a lleihau ansicrwydd; lle nad yw hyn yn bosibl, dylai'r Ymgeisydd sicrhau bod y Datganiad Amgylcheddol yn asesu senario achos gwaethaf gan ddefnyddio ymagwedd wedi'i seilio ar baramedrau. Dylai'r disgrifiad

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			gael ei ategu (fel y bo'r angen) gan ffigurau, croestoriadau a lluniadau a ddylai gael eu cyfeirnodi'n glir ac yn briodol.
2.1.2	Paragraffau 1.2, 1.3 ac 1.31	Prosiectau cysylltiedig	Byddai'r OHL arfaethedig yn darparu cysylltiad rhwng Parc Ynni arfaethedig Llyn Lort yng Nghymru a rhwydwaith trydan 400kV presennol y Grid Cenedlaethol yn Swydd Amwythig yn Lloegr. Byddai angen is-orsaf newydd yn Frankton Isaf i hwyluso cysylltu'r OHL arfaethedig â'r rhwydwaith presennol. Mae paragraffau 1.2 ac 1.3 yr Adroddiad Cwmpasu yn datgan y byddai'r is-orsaf hon yn cael ei chydsynio ar wahân gan y Grid Cenedlaethol ac nad yw'n ffurfio rhan o'r Datblygiad Arfaethedig. Dangosir yr ardal chwilio ar gyfer is-orsaf newydd y Grid Cenedlaethol yn Ffigurau 1.2 ac 1.3 yr Adroddiad Cwmpasu, ac mae paragraff 1.29 yr Adroddiad Cwmpasu yn datgan ei bod "yn debygol" y caiff ei lleoli o fewn yr ardal chwilio hon. Mae Parc Ynni arfaethedig Llyn Lort yn cael ei ddatblygu gan Llyn Lort Energy Park Limited ac nid yw'n ffurfio rhan o'r Datblygiad Arfaethedig.
			Dylai'r Datganiad Amgylcheddol ddisgrifio'r berthynas rhwng y Datblygiad Arfaethedig a phrosiectau cysylltiedig yn glir. Dylai hyn gynnwys i ba raddau y mae'r Datblygiad Arfaethedig yn dibynnu ar eu cyflawni ac amserlenni datblygu a llwybrau cydsynio disgwyliedig y prosiectau eraill, gydag esboniad o sut bydd y rhain yn cael eu cydlynu. Dylai'r asesiad fynd i'r afael â'r potensial i'r prosiectau cysylltiedig arwain at LSE. Mae'r Arolygiaeth yn cynghori bod y Datganiad Amgylcheddol yn amlinellu'n glir ac yn fanwl sut mae'r asesiad yn mynd i'r afael ag effeithiau sy'n deillio o ddatblygiad canlyniadol a gweithgarwch sy'n debygol o arwain at effeithiau arwyddocaol. Dylai'r Datganiad Amgylcheddol esbonio a chyfiawnhau ffiniau a therfynau'r asesiad yn glir a, chan nodi y gallai ansicrwydd barhau, unrhyw dybiaethau rhesymol a gymhwyswyd. Dylai'r asesiad

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			fynd i'r afael â'r senario achos gwaethaf (a allai fod yn wahanol ar gyfer gwahanol agweddau).
2.1.3	Paragraffau 1.30, 3.8, 3.11 i 3.17 a 3.33 i	Ceblau tanddaear	Mae'r Adroddiad Cwmpasu yn datgan y byddai angen tua 5km o geblau tanddaear i gysylltu'r is-orsaf gasglu â'r CSEC. Dywedir y byddai'n cael ei lwybro trwy Barc Ynni arfaethedig Llyn Lort, er nad yw'r llwybr tebygol wedi cael ei nodi ar hyn o bryd.
	3.36		Caiff tanddaearu rhannau o'r ceblau (yn hytrach nag OHL) ei ystyried hefyd, ond nid oes unrhyw leoliadau o'r fath wedi cael eu hamlygu ar yr adeg hon, fel y nodwyd uchod.
			Dylai'r ES ddisgrifio'r llwybr, y lled a'r dyfnder ffos a'r lled ystod cebl tebygol ar gyfer yr holl geblau tanddaear arfaethedig, gan gyfeirio at ffigurau cysylltiedig. Dylai'r ES nodi nifer y ceblau tanddaear sydd i'w gosod ym mhob ffos a chadarnhau nifer y ffosydd y bydd eu hangen. Dylid disgrifio'r gwaith sy'n ofynnol i osod y ceblau, gan gynnwys dad-ddyfrio unrhyw gloddiadau. Dylai unrhyw LSE sy'n deillio o adeiladu a gweithredu'r ceblau tanddaear gael eu hasesu yn y Datganiad Amgylcheddol. Mae'r Arolygiaeth o'r farn y dylai'r asesiad gynnwys effeithiau ar dderbynyddion hydroddaearegol (gan nodi nad yw'r rhain wedi'u hamlygu ym mharagraff 3.11 yr Adroddiad Cwmpasu). Os bydd angen ffyrddfreintiau agored trwy goetir/llystyfiant dros y ceblau tanddaear yn ystod gweithredu, dylai hyn gael ei esbonio yn y Datganiad Amgylcheddol a'i ystyried yn yr asesiadau o agweddau perthnasol.
2.1.4	Paragraffau 3.1 i 3.4	Tyrau dur (peilonau)	Mae'r Adroddiad Cwmpasu yn datgan y byddai'r OHL arfaethedig yn cael ei chynnal ar dŵr `L7' (neu rywbeth tebyg) ac mae'n amlygu tri math o dŵr L7 (tyrau crog, tensiwn a therfynell). Nodir mai'r "uchder safonol" ar gyfer tŵr L7 yw 27m.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol nodi uchafswm nifer y peilonau arfaethedig a rhoi eu dimensiynau. Dylai hyn gynnwys uchafswm uchderau a lledau'r gwaith dur ei hun, ynghyd â manylion y math o dŵr a sylfeini a fyddai'n ofynnol yn lleoliad pob peilon. Mae'r Arolygiaeth yn cydnabod y gallai fod angen rhywfaint o hyblygrwydd i ficroleoli peilonau, ond byddai'n disgwyl i'r lleoliadau arfaethedig gael eu nodi yn y Datganiad Amgylcheddol ynghyd ag unrhyw derfynau gwyro (LoD) sy'n ofynnol (yn ochrol ac yn fertigol, h.y. o ran dyfnderoedd y sylfeini). Dylai'r holl arolygon ac asesiadau fod ar raddfa ofodol ddigonol i gynnwys unrhyw LoD ar gyfer yr holl seilwaith parhaol.
			Dylai'r Datganiad Amgylcheddol asesu'r dyluniad sylfaen sydd i'w ddefnyddio neu, os nad yw wedi'i benderfynu eto, dylid defnyddio senario achos gwaethaf i amlygu unrhyw LSE.
2.1.5	Paragraff 3.18	Cyfadeiladau adeiladu/ ardaloedd paratoi	Dylai'r Datganiad Amgylcheddol gadarnhau lleoliadau a meintiau'r ardaloedd cyfadeilad adeiladu/ paratoi a, lle y bo'n bosibl, dangos gosodiadau manwl. Dylai unrhyw fesurau lliniaru a gynigir i osgoi effeithiau sy'n gysylltiedig â defnyddio'r cyfadeiladau, neu eu lleihau i'r eithaf, gael eu disgrifio yn y Datganiad Amgylcheddol.
2.1.6	Paragraff 3.18	Seilwaith presennol	Mae'r Adroddiad Cwmpasu yn amlygu nifer o asedau seilwaith presennol o fewn neu'n agos i safle'r Datblygiad Arfaethedig, gan gynnwys rheilffordd, llinellau uwchben a chamlas. Mae hefyd yn datgan y gallai fod angen gwyriadau neu addasiadau i gyfleustodau trydydd parti i hwyluso adeiladu a gweithredu'r Datblygiad Arfaethedig.
			Dylai'r asesiad yn y Datganiad Amgylcheddol ystyried lleoliad seilwaith presennol ac amlygu unrhyw ryngweithiadau rhyngddo â'r Datblygiad Arfaethedig. Dylid asesu unrhyw effeithiau arwyddocaol

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			sy'n debygol o ddigwydd. Tynnir sylw'r Ymgeisydd at yr ymatebion i'r ymgynghoriad cwmpasu, gan gynnwys gan Network Rail, National Grid Electricity Transmission, SP Energy Networks a Glandŵr Cymru (Atodiad 2 y Farn hon) sy'n amlygu seilwaith y mae'n debygol yr effeithir arno.
2.1.7	Paragraffau 3.34 i 3.37	Croesfannau dros dro a pharhaol; croesfannau di-ffos	Dylai lleoliadau croesfannau parhaol a dros dro (e.e. ar gyfer seilwaith trafnidiaeth, cyrsiau dŵr, nentydd a ffosydd caeau), croesfannau diffos a'r fethodoleg groesi benodol ar gyfer pob lleoliad gael eu nodi yn y Datganiad Amgylcheddol.
			Pan ddibynnir ar ddulliau gosod di-ffos i liniaru effeithiau arwyddocaol posibl (er enghraifft, croesfannau cyrsiau dŵr), dylai'r Ymgeisydd sicrhau y gellir dangos bod y dull adeiladu hwn wedi'i sicrhau.
			Cyfeirir yr Ymgeisydd at ymateb Glandŵr Cymru i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) sy'n nodi y byddai angen i groesfannau tanddaear o'r gamlas fod o leiaf 3.5m o dan lefel gwely caled y gamlas. Dylai'r Datganiad Amgylcheddol roi gwybodaeth am yr isafswm dyfnder sydd i'w dybio ar gyfer croesfannau di-ffos.
2.1.8	dd/b	Uchderau strwythurau	Dylai'r Datganiad Amgylcheddol ddatgan p'un a yw uchderau strwythurau Uwchben Datwm Ordnans (AOD), neu uwchben lefel y tir. Dylai'r derminoleg fod yn gyson drwy gydol y Datganiad Amgylcheddol a chyd-fynd â'r paramedrau uchafswm uchder yn y Gorchymyn Caniatâd Datblygu drafft (dDCO).
2.1.9	Paragraffau 3.31 a 3.32	Lefelau ffyrdd	Dylai lefelau gorffenedig arfaethedig ffyrdd mynediad parhaol AOD gael eu nodi yn y Datganiad Amgylcheddol (ynghyd ag unrhyw LoDau sy'n angenrheidiol).

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
2.1.10	Paragraffau 3.47, 3.48 a 12.33	Cam adeiladu	Dylai'r disgrifiad o nodweddion y cam adeiladu gael ei ddatblygu yn y Datganiad Amgylcheddol i gynnwys hyd cyfan y cam adeiladu, ynghyd â'r oriau gwaith disgwyliedig (gan gynnwys unrhyw gyfnodau ar y penwythnos (prynhawn dydd Sadwrn a dydd Sul) a gweithio yn y nos sy'n ofynnol, fel y nodir ym mharagraff 12.33) a'r gweithgareddau y seiliwyd yr asesiadau o LSE arnynt. Dylai hyn fod yn gyson â'r oriau gwaith a nodwyd yn y dDCO.
2.1.11	Paragraffau 3.53 i 3.56	Cam gweithredol	Dylai'r dyddiad y disgwylir i'r Datblygiad Arfaethedig ddod yn weithredol gael ei nodi yn y Datganiad Amgylcheddol.
2.1.12	Pennod 12	Pyllau benthyg	Mae Pennod 12 yr Adroddiad Cwmpasu (Sŵn a Dirgryniad) yn esbonio efallai y bydd angen cloddio pyllau benthyg (gan gynnwys ffrwydro) yn rhan o'r Datblygiad Arfaethedig. Nid yw penodau agwedd eraill yr Adroddiad Cwmpasu yn trafod effeithiau posibl sy'n gysylltiedig â phyllau benthyg ac ni amlygwyd lleoliadau posibl ar gyfer pyllau benthyg ar yr adeg hon.
			Dylai'r Datganiad Amgylcheddol nodi nifer a lleoliad disgwyliedig pyllau benthyg, gan gyfeirio at gynllun(iau) cysylltiedig a disgrifio eu nodweddion ffisegol.
			Dylai'r pyllau benthyg gael eu cynnwys yn yr ardaloedd astudio ar gyfer asesiadau agwedd perthnasol a dylai unrhyw effeithiau arwyddocaol sy'n debygol o ddigwydd o ganlyniad i'w creu gael eu hasesu yn y Datganiad Amgylcheddol.
2.1.13	dd/b	Cynlluniau rheoli	Dylai'r Ymgeisydd atodi copi drafft/ amlinellol o gynlluniau rheoli arfaethedig i'r Datganiad Amgylcheddol a dangos sut byddai'r rhain yn cael eu sicrhau trwy'r dDCO. Lle mae'r Datganiad Amgylcheddol yn dibynnu ar fesurau lliniaru a fyddai'n cael eu sicrhau trwy gynlluniau/

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			strategaethau rheoli, dylid dangos (gan groesgyfeirio'n glir) ble mae pob mesur wedi'i amlinellu yn y ddogfen ddrafft/ amlinellol.
2.1.14	dd/b	Cyflogaeth	Dylai'r Datganiad Amgylcheddol nodi nifer a natur ddisgwyliedig y cyfleoedd cyflogaeth yn ystod pob cam o'r Datblygiad Arfaethedig. Dylai'r Datganiad Amgylcheddol ystyried tarddiad ei weithlu mewn asesiadau agwedd perthnasol. Dylai'r holl dybiaethau a wneir yn hyn o beth gael eu hamlinellu yn y Datganiad Amgylcheddol.
2.1.15	dd/b	Symudiadau cerbydau	Dylai'r Datganiad Amgylcheddol fanylu ar nifer ddisgwyliedig y symudiadau cerbydau yn ystod pob cam o'r Datblygiad Arfaethedig ac esbonio'r tybiaethau y seiliwyd y rhain arnynt.
2.1.16	dd/b	Goleuadau	Dylai'r Datganiad Amgylcheddol ddisgrifio lleoliad, math ac oriau defnydd y goleuadau sy'n ofynnol ar gyfer pob cam o'r Datblygiad Arfaethedig. Dylai effeithiau sy'n deillio o gyflwyno goleuadau yn ystod adeiladu a gweithredu sy'n debygol o arwain at effeithiau arwyddocaol gael eu hasesu yn y Datganiad Amgylcheddol.

2.2 Methodoleg AEA a Chwmpas yr Asesiad

(Pennod 4 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
2.2.1	Paragraff 2.14	Dewisiadau amgen	Dylai'r disgrifiad o ddewisiadau amgen rhesymol yn y Datganiad Amgylcheddol gymharu effeithiau amgylcheddol. Dylai gynnwys y lleoliadau penodol a ystyriwyd ar gyfer ceblau tanddaear (yn hytrach nag OHL). Dylid darparu esboniadau ar gyfer hyd a lled yr OHL ac unrhyw rannau tanddaear a lleoliad yr is-orsaf gasglu a'r CSEC.
2.2.2	Paragraffau 3.53 i 3.56	Effeithiau o gynnal a chadw, gan gynnwys amnewid elfennau	Mae'r Adroddiad Cwmpasu yn esbonio bod angen i ddargludyddion OHL gael eu hadnewyddu ar ôl tua 40 mlynedd yn gyffredinol, ond y gallai fod angen amnewid y gosodiadau a'r ynysyddion yn gynt (tua 20-25 mlynedd).
			Dylai'r Datganiad Amgylcheddol ddisgrifio cwmpas a hyd y gweithgareddau cynnal a chadw ac amnewid sy'n debygol o fod yn ofynnol, gan gynnwys symudiadau cerbydau a niferoedd staff rhagfynedig. Dylai'r Datganiad Amgylcheddol ddarparu amcangyfrifon o ba fath a faint o wastraff sy'n debygol o gael ei gynhyrchu gan y gweithgareddau cynnal a chadw ac amnewid, yn ogystal ag asesiad o unrhyw LSE sy'n gysylltiedig â chynhyrchu a gwaredu gwastraff.
2.2.3	Paragraff 4.13	Llinell sylfaen	Mae'r disgrifiad o'r amodau sylfaenol yn yr Adroddiad Cwmpasu yn canolbwyntio ar y Coridor Cwmpasu yn gyffredinol. Dylai'r Datganiad Amgylcheddol ddisgrifio'r amodau sylfaenol ar draws safle'r cais yn ei gyfanrwydd.
2.2.4	Paragraff 4.13	Llinell sylfaen	Mae'r Adroddiad Cwmpasu yn nodi y gallai'r Datganiad Amgylcheddol ddefnyddio data a gasglwyd ar gyfer Parc Ynni arfaethedig Llyn Lort (wedi'i ddiweddaru lle y bo'n berthnasol), yn ogystal â data a

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			gasglwyd gan yr Ymgeisydd ar gyfer y Datblygiad Arfaethedig yn benodol.
			Dylai'r Datganiad Amgylcheddol ddefnyddio'r setiau data cynrychioliadol mwyaf diweddar sydd ar gael ar yr adeg cynhyrchu. Dylid cyfeirio'n glir at ddata a gasglwyd mewn perthynas â phrosiectau eraill ac a ddefnyddiwyd yn y Datganiad Amgylcheddol ar gyfer y Datblygiad Arfaethedig hwn, a dylai'r Datganiad Amgylcheddol esbonio pam yr ystyrir bod y data hwnnw'n berthnasol a, lle nad yw wedi'i ddiweddaru, pam yr ystyrir ei fod yn parhau i fod yn gynrychioliadol o gyflwr presennol yr amgylchedd.
			Dylai'r Ymgeisydd wneud ymdrech i gytuno ar addasrwydd y wybodaeth a ddefnyddir ar gyfer yr asesiadau yn y Datganiad Amgylcheddol gyda chyrff ymgynghori perthnasol.
2.2.5	Paragraffau 4.14 a 4.15	Llinell sylfaen yn y dyfodol	Yng ngoleuni'r datblygiadau sydd wedi'u cynllunio yng nghyffiniau safle cais y Datblygiad Arfaethedig, dylai'r Ymgeisydd ddatgan yn glir pa ddatblygiadau y tybir eu bod wrthi'n cael eu hadeiladu neu'n weithredol yn rhan o'r llinell sylfaen yn y dyfodol.
2.2.6	Paragraffau 4.17 a 4.19	Asesiad o effeithiau ac ardaloedd astudio	Mae mwyafrif yr ardaloedd astudio arfaethedig ar gyfer yr asesiadau o agweddau wedi cael eu diffinio mewn perthynas â Choridor yr Adroddiad Cwmpasu yn unig. Yn ogystal, prin yw'r cyfeiriadau ym mhenodau agwedd yr Adroddiad Cwmpasu at effeithiau posibl o'r ceblau tanddaear sy'n ofynnol rhwng yr is-orsaf gasglu a'r CSEC.
			Dylai'r ardaloedd astudio at ddibenion y Datganiad Amgylcheddol gael eu diffinio mewn perthynas â graddau'r effeithiau tebygol o bob elfen o'r Datblygiad Arfaethedig, gan gynnwys yr is-orsaf gasglu a'r ceblau tanddaear rhwng yr is-orsaf gasglu a'r CSEC. Dylai'r asesiad o LSE

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			fynd i'r afael â'r effeithiau tebygol o bob elfen o'r Datblygiad Arfaethedig.
2.2.7	Paragraff 4.17	Asesiad o effeithiau	Nid yw'r Adroddiad Cwmpasu yn cyfeirio at Sylffwr Hecsafflworid (SF6). Dylai'r Datganiad Amgylcheddol egluro p'un a fyddai seilwaith sy'n gysylltiedig â'r Datblygiad Arfaethedig yn defnyddio SF6 a darparu asesiad o effeithiau lle mae potensial i LSE ddigwydd. Dylai'r Ymgeisydd sicrhau ei fod yn cydymffurfio â gofynion y Datganiad Polisi Cenedlaethol ar gyfer Seilwaith Rhwydweithiau Trydan (EN-5) yn hyn o beth.

3. SYLWADAU AR AGWEDDAU AMGYLCHEDDOL

3.1 Agweddau/ materion nad yw'r Ymgeisydd yn bwriadu eu cynnwys yn yr AEA

(Pennod 6 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.1.1	Paragraffau 6.11 i 6.14. a Thabl 6.1	Meysydd trydanol a magnetig (EMFau) – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor effeithiau EMFau yn ystod gweithredu ar y sail y byddai'r Datblygiad Arfaethedig yn cydymffurfio â chanllawiau amddiffyn iechyd ac amlygiad y Comisiwn Rhyngwladol ar Ddiogelu rhag Ymbelydredd nad yw'n Ïoneiddio (ICNIRP).
			Ar y sail y bydd y Datblygiad Arfaethedig yn cydymffurfio â'r canllawiau EMF perthnasol cyfredol, o leiaf, yn ei holl weithrediadau ac y bydd unrhyw gais DCO yn cynnwys dogfen ar wahân a fydd yn cynnwys manylion a gwybodaeth ynglŷn â sut bydd y Datblygiad Arfaethedig yn cydymffurfio â chanllawiau a chodau ymarfer perthnasol, mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn ar gyfer gweithredu. Fodd bynnag, mae'r Arolygiaeth o'r farn y dylai'r Datganiad Amgylcheddol gynnwys crynodeb o'r ddogfen gydymffurfio ar wahân a ddisgrifiwyd.
			Ar y sail bod EMFau yn gysylltiedig â dosbarthu pŵer yn ystod gweithredu, mae'r Arolygiaeth yn cytuno i hepgor asesiad o EMFau yn ystod adeiladu.
3.1.2	Paragraffau 6.23 ac	Allyriadau nwyon tŷ gwydr (GHG) – adeiladu a gweithredu	Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth wedi cael ei darparu i gyfiawnhau hepgor allyriadau GHG.
	8.13 a Thabl 6.1		Dylai'r Datganiad Amgylcheddol ddarparu asesiad o effeithiau o allyriadau GHG yn ystod adeiladu (a gweithredu, lle y bo'n

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			berthnasol) lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai'r Datganiad Amgylcheddol amlinellu'n glir yr ymagwedd at ddiffinio arwyddocâd effeithiau a cyd-destunoli allyriadau'r Datblygiad Arfaethedig, gan gyfeirio at ganllawiau perthnasol. Dylai'r cyfrifiad o allyriadau GHG ystyried allyriadau ar draws cylch oes lawn y prosiect, gan gynnwys, lle y bo'n berthnasol, unrhyw allyriadau sy'n codi yn sgil newid i ddefnydd tir, ac allyriadau uniongyrchol ac anuniongyrchol sy'n gysylltiedig â'r cam adeiladu, gan gynnwys allyriadau carbon ymgorfforedig o'r deunyddiau sy'n ofynnol.
			Mae'r Adroddiad Cwmpasu yn amlygu presenoldeb mawndir o fewn y Coridor Cwmpasu. Dylai'r asesiad o allyriadau GHG ystyried colli mawn.
			Tynnir sylw'r Ymgeisydd at sylwadau'r Arolygiaeth yn Nhabl 2.2 uchod ynglŷn ag SF6 mewn perthynas â'r asesiad GHG.
3.1.3	Paragraff 6.24 a Thabl 6.1	Effeithiau'r hinsawdd sy'n berthnasol i ymaddasu – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn datgan y bydd y Datblygiad Arfaethedig yn cael ei ddylunio i wrthsefyll eithafion hinsawdd y Deyrnas Unedig (gan gynnwys rhagfynegiadau newid yn yr hinsawdd). Mae'r Adroddiad Cwmpasu yn cynnig y bydd effeithiau'r hinsawdd sy'n gysylltiedig ag ymaddasu yn cael eu hystyried yn y penodau pwnc amgylcheddol perthnasol yn y Datganiad Amgylcheddol, lle y bo'n gymwys (e.e. bydd bregusrwydd y Datblygiad Arfaethedig i'r newid yn yr hinsawdd o ran perygl llifogydd yn cael ei ystyried ym Mhennod Adnoddau Dŵr y Datganiad Amgylcheddol ac yn yr Asesiad o Berygl Llifogydd (FRA)).
			Mae'r Arolygiaeth yn fodlon ar yr ymagwedd arfaethedig ac yn cytuno nad oes angen asesu effeithiau'r hinsawdd sy'n berthnasol i ymaddasu ymhellach yn y Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.1.4	Paragraffau 6.26 i 6.28 a Thabl 6.1	Pennod agwedd annibynnol yn y Datganiad Amgylcheddol ar gyfer iechyd a lles	Mae'r Adroddiad Cwmpasu yn cynnig hepgor pennod agwedd annibynnol yn y Datganiad Amgylcheddol ar gyfer iechyd a lles ar y sail y byddai effeithiau ar iechyd a lles yn derbyn sylw o fewn penodau agwedd unigol y Datganiad Amgylcheddol, sef; tirwedd ac amwynder gweledol, traffig a thrafnidiaeth, sŵn a dirgryniad, cyflwr y tir, daeareg a hydroleg, ansawdd aer.
			Mae paragraff 6.28 yn datgan lle y ceir effeithiau o fewn prosiectau, byddai hyn yn cael ei ystyried yn yr asesiad cronnol o fewn prosiectau a'i gyflwyno mewn adran ar iechyd dynol yn y bennod ar effeithiau cronnol.
			Mae'r Arolygiaeth o'r farn bod pennod ar wahân yn y Datganiad Amgylcheddol sy'n ymdrin ag iechyd a lles yn ofynnol i sicrhau nad yw effeithiau cyffredinol y cynllun yn cael eu hanwybyddu. Dylid ystyried effeithiau uniongyrchol ac anuniongyrchol ar iechyd corfforol a meddyliol derbynyddion, yn ogystal â'r potensial ar gyfer effeithiau penodol ar unrhyw boblogaethau agored i niwed. Fodd bynnag, dylai'r Datganiad Amgylcheddol osgoi dyblygu asesiadau a, lle y bo'n berthnasol, dylai'r bennod ar yr agwedd iechyd a lles groesgyfeirio at wybodaeth a gynhwysir mewn penodau ar agweddau eraill. Dylai'r bennod iechyd a lles ystyried canllawiau perthnasol fel canllawiau'r Sefydliad Rheoli ac Asesu Amgylcheddol (IEMA) 2022 'Pennu Arwyddocâd ar gyfer Iechyd Dynol mewn Asesiad o'r Effaith Amgylcheddol'.
			Mae'r Adroddiad Cwmpasu yn cadarnhau y bydd effeithiau ar Hawliau Tramwy Cyhoeddus (PRoWs), a allai effeithio ar fynediad at wasanaethau, yn cael eu hasesu ym Mhennod 11 y Datganiad Amgylcheddol (Traffig a Thrafnidiaeth). Yn ogystal â mynediad at wasanaethau, dylid hefyd ystyried y posibilrwydd y gallai colli/ tarfu ar PRoW effeithio ar iechyd a lles pobl a dylid darparu asesiad o

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			unrhyw LSE. Tynnir sylw'r Ymgeisydd at ymateb Cyngor Sir Powys i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) yn hyn o beth.
3.1.5	Paragraff 6.26	Iechyd a lles – gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn ar y sail bod effeithiau ar iechyd a lles yn annhebygol o ymestyn y tu hwnt i gam adeiladu'r datblygiad ac nad oes unrhyw effeithiau arwyddocaol yn debygol yn ystod gweithredu'r Datblygiad Arfaethedig, o ganlyniad i ddiffyg cynhenid llwybr o'r effeithiau hyn i dderbynyddion dynol yn ystod gweithredu.
			Mae'r Arolygiaeth yn fodlon, o ystyried natur y Datblygiad Arfaethedig, bod effeithiau ar iechyd dynol yn ystod gweithredu yn annhebygol o arwain at LSE ac mae'n cytuno i hepgor y mater hwn.
3.1.6	Paragraffau 6.31, 6.32 a 6.33 a Thabl 6.1	Asesiad agwedd y Datganiad Amgylcheddol o ddamweiniau mawr a thrychinebau	Mae'r Adroddiad Cwmpasu yn cynnig hepgor yr agwedd hon o'r Datganiad Amgylcheddol ar y sail, trwy gymhwyso'r siart lif a amlinellir yn Ffigur 1 Paratöwr IEMA Damweiniau Mawr a Thrychinebau mewn AEA, y gellir lliniaru'r risgiau sy'n berthnasol i'r Datblygiad Arfaethedig trwy arferion gwaith ac adeiladu da hyd at lefel sydd mor isel ag sy'n rhesymol ymarferol (ALARP). Mae'r Adroddiad Cwmpasu yn datgan ymhellach y byddai'r Datblygiad Arfaethedig yn cael ei ddylunio i wrthsefyll eithafion hinsawdd y Deyrnas Unedig (gan gynnwys rhagfynegiadau'r newid yn yr hinsawdd) ac felly ni ystyrir bod effeithiau allanol ar y seilwaith OHL yn debygol o fod yn arwyddocaol.
			Gan nodi'r pryderon a fynegwyd gan y Weinyddiaeth Amddiffyn a Chynghorau Plwyf (Atodiad 2 y Farn hon), nid yw'r Arolygiaeth o'r farn bod digon o dystiolaeth wedi cael ei darparu ar yr adeg hon i gyfiawnhau hepgor asesiad o ddamweiniau mawr a thrychinebau.

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol asesu risgiau damweiniau mawr a thrychinebau a risgiau ohonynt yn ystod adeiladu a gweithredu lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Mae'r Arolygiaeth o'r farn y dylai'r asesiad hwn gynnwys y potensial i'r Datblygiad Arfaethedig fod yn agored i ddamweiniau mawr, neu eu hachosi, wrth groesfannau cyrsiau dŵr a seilwaith trafnidiaeth, yn ogystal ag unrhyw risgiau i awyrennau sy'n hedfan yn isel.
3.1.7	Paragraffau 6.34 i 6.43 a Thabl 6.1	Asesiad agwedd y Datganiad Amgylcheddol ar faterion economaidd-gymdeithasol	Mae'r Adroddiad Cwmpasu yn cynnig hepgor asesiad economaiddgymdeithasol penodol o'r Datganiad Amgylcheddol ac, yn lle hynny, cyflwyno dogfen 'Gwybodaeth Economaidd-Gymdeithasol' i gyd-fynd â'r cais DCO. Mae'r Adroddiad Cwmpasu yn datgan y bydd y Datganiad Amgylcheddol (trwy gyfrwng ffactorau eraill sydd wedi'u cynnwys yn yr asesiad) yn ystyried "agweddau sy'n berthnasol i effeithiau economaidd-gymdeithasol posibl ar bobl" o fewn asesiadau canlynol y Datganiad Amgylcheddol: Traffig a Thrafnidiaeth; Tirwedd a Gweledol; Sŵn; ac Ansawdd Aer. Mae'r Adroddiad Cwmpasu yn amlinellu safbwynt yr Ymgeisydd nad yw'r Rheoliadau AEA yn nodi gofyniad clir i ymgeisydd ystyried ffactorau economaidd-gymdeithasol.
			Er bod yr Arolygiaeth o'r farn y byddai'r penodau agwedd y cyfeiriwyd atynt yn ymdrin â'r effeithiau economaidd-gymdeithasol posibl i raddau helaeth, ni ddarparwyd digon o wybodaeth sylfaenol i ganiatáu ar gyfer hepgor asesiad o'r agwedd economaiddgymdeithasol o'r Datganiad Amgylcheddol ar yr adeg hon. Mae'r Arolygiaeth yn nodi safbwynt yr Ymgeisydd ynglŷn â ph'un a yw ffactorau economaidd-gymdeithasol yn ofyniad o'r Rheoliadau AEA. Mae'r Arolygiaeth yn tynnu sylw'r Ymgeisydd at Adran 5.12 y Datganiad Polisi Cenedlaethol Trosfwaol ar gyfer Ynni (EN-1) yn hyn o beth, sy'n mynnu bod yr Ymgeisydd yn cynnal asesiad o effeithiau

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			economaidd-gymdeithasol ar lefelau lleol a rhanbarthol yn rhan o'r Datganiad Amgylcheddol.
			Dylai'r Datganiad Amgylcheddol ddarparu asesiad o effeithiau economaidd-gymdeithasol yn ystod adeiladu a gweithredu lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylid gwneud ymdrech i gytuno ar gwmpas yr asesiad gyda chyrff ymgynghori perthnasol. Fel yr amlinellir yn Nhabl 3.10 isod (Priddoedd ac Amaethyddiaeth), dylai'r asesiad gynnwys effeithiau ar weithrediadau ffermio lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai'r asesiad hefyd asesu effeithiau ar dwristiaeth lle y gallai LSE ddigwydd, o ystyried nifer y cyrchfannau i dwristiaid sy'n agos i'r Coridor Cwmpasu.
			Dylai'r Datganiad Amgylcheddol ddisgrifio unrhyw fesurau lliniaru neu gytundebau iawndal y dibynnir arnynt i fynd i'r afael ag LSEau gyda thystiolaeth o gytundeb y daethpwyd iddo gyda'r partïon yr effeithir arnynt.
			Os na chaiff yr asesiad ei gyflwyno mewn pennod annibynnol ar Faterion Economaidd-Gymdeithasol yn y Datganiad Amgylcheddol, dylai'r Datganiad Amgylcheddol groesgyfeirio'n glir at ble yr ystyrir yr effeithiau perthnasol.
3.1.8	Paragraffau 6.44 a 6.45	Effeithiau o ddatgomisiynu	Mae Pennod 6 yr Adroddiad Cwmpasu yn cynnig bod datgomisiynu'n cael ei hepgor o'r Datganiad Amgylcheddol – mae'n disgwyl y byddai datgomisiynu'n digwydd dim ond pan na fydd achos busnes dros drawsyrru trydan mwyach, ac mae'n datgan y byddai datgomisiynu'n ddarostyngedig i weithdrefnau cydsynio ar wahân.
			Mae'r Arolygiaeth yn nodi bod rhai (ond nid pob un) o'r penodau ar agweddau amgylcheddol yn yr Adroddiad Cwmpasu yn cyfeirio at effeithiau datgomisiynu (e.e. Pennod 11: Traffig a Thrafnidiaeth), ond

Rhif Adna bod	Cyfeirnod	Agweddau/ materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			mae'n ymddangos y cynigir hepgor effeithiau datgomisiynu ym mhob achos.
			Mae'r Arolygiaeth yn cytuno y gellir hepgor datgomisiynu o'r Datganiad Amgylcheddol, yn amodol ar atodi crynodeb lefel uchel o effeithiau posibl ar gyfer pob agwedd amgylcheddol i'r Datganiad Amgylcheddol. Mae'r Arolygiaeth yn disgwyl i hyn gynnwys disgrifiad o'r dulliau datgomisiynu tebygol.

3.2 Tirwedd ac Amwynder Gweledol

(Pennod 7 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.2.1	Paragraffau 7.21, 7.22 a Thabl 7.2	Effeithiau ar y derbynyddion canlynol – adeiladu a gweithredu: Parc Cenedlaethol Eryri; Ardal o Harddwch Naturiol Eithriadol (AHNE) Bryniau Clwyd a Dyffryn Dyfrdwy; ac AHNE Bryniau Swydd Amwythig.	Mae'r Adroddiad Cwmpasu yn datgan bod y Coridor Cwmpasu dros 14km oddi wrth Barc Cenedlaethol Eryri a dros 5km oddi wrth yr AHNE agosaf (sef 'Tirwedd Genedlaethol' bellach) (Tirweddau Cenedlaethol Bryniau Clwyd a Dyffryn Dyfrdwy; a Bryniau Swydd Amwythig). Mae'r Arolygiaeth yn cytuno nad yw effeithiau ar Barc Cenedlaethol Eryri ac ar Dirweddau Cenedlaethol yn debygol o arwain at effeithiau arwyddocaol ac y gellir eu hepgor o asesiad pellach. Mae Cyfoeth Naturiol Cymru (CNC) wedi amlygu (Atodiad 2 y Farn hon) bod y Coridor Cwmpasu a'r Ardal Astudio ar gyfer yr Asesiad o'r Effaith ar y Dirwedd a'r Effaith Weledol (LVIA) Dros Dro yn gorgyffwrdd â'r ardal chwilio ar gyfer Prosiect Dynodi Parc Cenedlaethol Gogledd-ddwyrain Cymru. Cynghorir yr Ymgeisydd i adolygu'r graddfeydd amser ar gyfer dynodi yn y dyfodol yn barhaus a gwneud ymdrech i gytuno ar yr ymagwedd at asesu gyda CNC. Yn dibynnu ar gynnydd y Prosiect hwn ar adeg unrhyw gais DCO, dylai'r Datganiad Amgylcheddol naill ai gynnwys asesiad sy'n tybio achos gwaethaf lle mae'r AoS wedi cael ei dynodi'n Barc Cenedlaethol Gogledd-ddwyrain Cymru, neu asesu effeithiau ar unrhyw ddynodiad Parc Cenedlaethol newydd.
3.2.2	Paragraff 7.23 a Thabl 7.2	Effeithiau ar Ardaloedd Tirwedd Arbennig (ATAau) – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn datgan bod yr ATAau agosaf dros 5km oddi wrth y Coridor Cwmpasu ac, oherwydd y pellter a'r dopograffeg

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			rhyngddynt a graddfa a natur y Datblygiad Arfaethedig, ni ddisgwylir unrhyw effeithiau ar nodweddion arbennig ATAau.
			Mae'r Arolygiaeth yn cytuno nad yw effeithiau ar ATAau yn debygol o arwain at effeithiau arwyddocaol ac y gellir eu hepgor o asesiad pellach.
3.2.3	Paragraff 7.46	Effeithiau cronnol ar dderbynyddion tirwedd a gweledol – adeiladu	Mae paragraff 7.46 yr Adroddiad Cwmpasu yn nodi y byddai effeithiau cronnol ar dderbynyddion tirwedd a gweledol yn cael eu hystyried mewn perthynas â cham gweithredol y Datblygiad Arfaethedig yn unig. O ystyried natur a nodweddion y Datblygiad Arfaethedig, mae'r Arolygiaeth yn fodlon ar yr ymagwedd hon. Gellir hepgor effeithiau cronnol ar dderbynyddion tirwedd a gweledol yn ystod adeiladu'r Datblygiad Arfaethedig.
3.2.4	Paragraffau 7.7 a 7.47 a Thabl 7.2	Effeithiau ar y derbynyddion canlynol – adeiladu a gweithredu: Derbynyddion gweledol sydd wedi'u lleoli y tu hwnt i 3km o'r Datblygiad Arfaethedig (heblaw am unrhyw dderbynyddion sensitif iawn hyd at 5km); a Derbynyddion gweledol sydd wedi'u lleoli y tu allan i'r Parth Gwelededd Damcaniaethol (ZTV).	Cynigir Ardal Astudio LVIA o 3km at ddibenion y Datganiad Amgylcheddol ac mae'r Adroddiad Cwmpasu yn cynnig hepgor effeithiau ar dderbynyddion gweledol y tu hwnt i 3km (heblaw am unrhyw dderbynyddion sensitif iawn hyd at 5km), ar y sail bod effeithiau'n annhebygol o fod yn arwyddocaol. Ni ddarparwyd digon o wybodaeth, fel mapio ZTV, i ddangos na fyddai effeithiau arwyddocaol yn digwydd y tu hwnt i 3km ac, fel y cyfryw, nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn o'r Datganiad Amgylcheddol. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o effeithiau ar unrhyw dderbynyddion gweledol sydd wedi'u lleoli y tu hwnt i 3km o'r Datblygiad Arfaethedig sy'n debygol o arwain at effeithiau arwyddocaol.
			Mae'r Arolygiaeth o'r farn y dylai'r ardal astudio, y ZTV a'r delweddau a gyflwynir yn y Datganiad Amgylcheddol gynrychioli hyd a lled yr effeithiau tebygol o adeiladu a gweithredu'r Datblygiad Arfaethedig a'r holl strwythurau arfaethedig, gan gynnwys yr is-orsaf gasglu. Dylai'r

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Ymgeisydd wneud ymdrech i gytuno ar yr ardal astudio a'r fethodoleg ar gyfer y ZTV gyda chyrff ymgynghori perthnasol, gan gynnwys awdurdodau lleol. Ar y sail hon, mae'r Arolygiaeth yn cytuno bod unrhyw effeithiau ar dderbynyddion gweledol sydd wedi'u lleoli y tu allan i'r ZTV, pan fyddant wedi'u cadarnhau trwy waith maes, yn annhebygol o arwain at effeithiau arwyddocaol. Gellir hepgor y mater hwn o asesiad pellach.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.2.5	Paragraffau 7.39 a 7.40, Tabl 7.1 a Ffigur 7.9	Golygfannau a delweddau	Mae Tabl 7.1 yr Adroddiad Cwmpasu yn amlinellu 17 o olygfannau cynrychioliadol rhagarweiniol, y dangosir eu lleoliadau ar Ffigur 7.9. Er yr esbonnir y bydd "golygfannau ychwanegol" yn cael eu dewis pan fydd y llwybr wedi cael ei fireinio, mae'r Arolygiaeth o'r farn bod y ffigur hwn yn gymharol isel, o ystyried natur a graddfa'r Datblygiad Arfaethedig. Yn ogystal, mae diffyg golygfannau i gefnogi'r asesiad o effeithiau o'r is-orsaf gasglu ac mae'r Arolygiaeth yn cynghori bod golygfannau addas yn cael eu dewis yn hyn o beth.
			Mae'r Arolygiaeth hefyd yn cynghori bod golygfannau addas yn cael eu dewis o leoliadau lle y gellid profi effeithiau cyfunol, olynol neu ddilyniannol o'r Datblygiad Arfaethedig (e.e. o PRoW) ac effeithiau cronnol â datblygiadau eraill. Mae Glandŵr Cymru a Chyngor Plwyf Kinnerley wedi awgrymu lleoliadau ar gyfer golygfannau hefyd (gweler Atodiad 2 y Farn hon).
			Dylid gwneud ymdrech i gytuno ar nifer a lleoliad golygfannau (cynrychioliadol, penodol a dangosol), yn ogystal â'r lleoliadau ar gyfer fframiau gwifrau a ffotogyfosodiadau, gyda chyrff ymgynghori

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			perthnasol gan gynnwys awdurdodau lleol, Historic England, Cadw, Natural England (NE) a Cyfoeth Naturiol Cymru (CNC).
3.2.6	Paragraffau 7.42 a 7.43	Effeithiau yn y nos	Dylai effeithiau ar y dirwedd ac amwynder gweledol sy'n deillio o gyflwyno goleuadau yn ystod adeiladu a gweithredu sy'n debygol o arwain at effeithiau arwyddocaol gael eu hasesu yn y Datganiad Amgylcheddol. Dylai unrhyw fesurau lliniaru arfaethedig gael eu disgrifio a'u sicrhau trwy'r dDCO. Dylai'r asesiad groesgyfeirio at asesiadau o agweddau perthnasol eraill a derbynyddion sensitif (fel ecoleg a threftadaeth ddiwylliannol).
3.2.7	Paragraffau 12.45 a 12.46	Effeithiau o fesurau lliniaru	Mae'r Arolygiaeth yn nodi y gallai fod angen "sgrinio lleol" a "sgrinio solet" i liniaru effeithiau sŵn adeiladu a gweithredol. Dylai effeithiau ar y dirwedd ac amwynder gweledol sy'n deillio o gyflwyno sgrinio sŵn sy'n debygol o arwain at effeithiau arwyddocaol gael eu hasesu yn y Datganiad Amgylcheddol.

3.3 Ecoleg

(Pennod 8 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.3.1	Paragraff 8.58 a Thabl 8.1	Safleoedd rhyngwladol a chenedlaethol a ddynodwyd ar gyfer bioamrywiaeth – gweithredu	Mae'r Ymgeisydd yn cynnig hepgor effeithiau ar safleoedd a ddynodwyd yn rhyngwladol ac yn genedlaethol yn ystod gweithredu, ar y sail na fydd llawer o dir yn cael ei gymryd ac y bydd tarfu lleiafsymiol yn dilyn adeiladu.
			Mae'r Arolygiaeth yn nodi bod rhai o'r safleoedd cenedlaethol a nodwyd yn Nhabl 8.1 wedi'u lleoli o fewn y Coridor Cwmpasu. O ystyried y diffyg llwybrau effaith canfyddadwy i'r safleoedd a nodwyd yn Nhabl 8.1 yn ystod gweithredu, mae'r Arolygiaeth yn cytuno i hepgor y mater hwn o'r Datganiad Amgylcheddol. Nid yw hyn yn atal unrhyw asesiad sy'n ofynnol o dan Reoliadau Cadwraeth Cynefinoedd a Rhywogaethau 2017.
3.3.2	Paragraff 3.54 a Thabl 8.2	Safleoedd (statudol) lleol a ddynodwyd ar gyfer bioamrywiaeth a choetiroedd hynafol – gweithredu	Mae'r Arolygiaeth yn nodi'r potensial i'r Datblygiad Arfaethedig groesi tri bloc o goetir hynafol. Mae'r Arolygiaeth o'r farn y byddai effeithiau ar safleoedd lleol a ddynodwyd ar gyfer bioamrywiaeth a choetiroedd hynafol yn digwydd yn ystod y cam adeiladu yn bennaf.
			Fodd bynnag, nid yw'n glir p'un a fyddai gweithgareddau cynnal a chadw a gynhelir yn ystod gweithredu yn effeithio ar y safleoedd hyn. Mae'r Adroddiad Cwmpasu yn cyfeirio at y gofyniad i glirio tyfiant newydd o ffyrddfreintiau a, heb lwybr diffiniedig ar gyfer yr OHL arfaethedig, nid yw'n glir p'un a fyddai effaith ar y dynodiadau a'r cynefinoedd hyn. Dylid egluro hyn yn y Datganiad Amgylcheddol. Felly, nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol ddarparu asesiad o ble mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.3.3	Paragraff 8.11 ac 8.58	Effeithiau uniongyrchol ac anuniongyrchol sy'n deillio o golli a/ neu ddarnio cynefinoedd o bryder cadwraeth yn barhaol – gweithredu	Mae'r Ymgeisydd yn cynnig hepgor y mater hwn ar y sail na fyddai cynefinoedd ychwanegol yn cael eu colli neu eu darnio (yn sgil effeithiau adeiladu) o ganlyniad i weithredu. Mae'r Adroddiad Cwmpasu yn datgan y byddai effeithiau posibl yn cael eu rheoli trwy weithredu Cynllun Diogelu Cynefinoedd.
			Cyfeiriwch at sylwadau'r Arolygiaeth o dan Rif Adnabod 3.3.2 ynglŷn â gweithgareddau cynnal a chadw, sydd yr un mor berthnasol i'r mater hwn. Felly, nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn o'r Datganiad Amgylcheddol. Dylai'r Datganiad Amgylcheddol ddarparu asesiad o ble mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.3.4	Paragraff 8.58	effeithiau uniongyrchol ac anuniongyrchol sy'n deillio o golli a/ neu ddarnio cynefinoedd (nad ydynt o bryder cadwraeth) dros dro	Mae'r Ymgeisydd yn cynnig hepgor y mater hwn ar y sail y bydd graddau'r cynefin a gollir dros dro yn ddibwys o gymharu â'r dirwedd amgylchynol ac y bydd tyrau'n cael eu microleoli cyn adeiladu os bydd angen.
		– gweithredu	Cyfeiriwch at sylwadau'r Arolygiaeth o dan Rif Adnabod 3.3.2 ynglŷn â gweithgareddau cynnal a chadw, sydd yr un mor berthnasol i'r mater hwn. Felly, nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn o'r Datganiad Amgylcheddol. Dylai'r Datganiad Amgylcheddol ddarparu asesiad o ble mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.3.5	Paragraff 8.58 a Thabl 8.2	Effeithiau uniongyrchol ac anuniongyrchol ar rywogaethau heblaw am adar sy'n cael eu gwarchod ac sy'n nodedig, gan gynnwys gweithgarwch ystlumod, pathewod, dyfrgwn, madfallod dŵr cribog (GCN) a phlanhigion fasgwlaidd ac anfasgwlaidd – gweithredu	Mae'r Ymgeisydd yn cynnig hepgor y materion hyn ar y sail y bydd effeithiau posibl yn cael eu rheoli trwy weithredu Cynlluniau Gwarchod Rhywogaethau (SPP) a fyddai'n cynnwys gwiriadau cyn gweithio ac, os oes angen, cyfyngiadau amseru a phellterau clustogi a thrwyddedau rhywogaethau a warchodir i sicrhau cydymffurfedd cyfreithiol. Yn unol â sylwadau'r Arolygiaeth o dan Rif Adnabod 3.3.2 ynglŷn â gweithgareddau cynnal a chadw, dylai'r SPPau fynd i'r afael â'r potensial i weithgareddau cynnal a chadw effeithio ar gynefin y rhywogaethau a restrir.
			Ar y sail hon ac o ystyried y potensial cyfyngedig i effeithiau ddigwydd yn ystod gweithredu, mae'r Arolygiaeth yn cytuno i hepgor y materion hyn o'r Datganiad Amgylcheddol.
3.3.6	Paragraff 8.56 a Thabl 8.2	Rhywogaethau estron goresgynnol (INNS) – adeiladu a gweithredu	Nid yw'r Adroddiad Cwmpasu yn nodi'n glir p'un a fydd asesiad o INNS yn cael ei ddarparu ar gyfer y camau adeiladu a gweithredol. Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth wedi cael ei darparu ynglŷn â phresenoldeb INNS a'r potensial iddynt ledaenu a chael eu cyflwyno gan y Datblygiad Arfaethedig i gyfiawnhau hepgor y mater hwn yn ystod adeiladu a gweithredu.
			Mae ymateb Asiantaeth yr Amgylchedd (EA) i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) yn amlygu cofnodion niferus o INNS o fewn a gerllaw'r Coridor Cwmpasu. Dylai'r Datganiad Amgylcheddol ddisgrifio unrhyw fesurau lliniaru a/ neu ragofalon bioddiogelwch sy'n angenrheidiol i atal INNS rhag lledaenu ac esbonio sut byddai'r rhain yn cael eu sicrhau a'u gweithredu trwy'r dDCO. Dylid gwneud ymdrech i drafod a chytuno ar fanylion unrhyw fesurau lliniaru a/ neu ragofalon bioddiogelwch angenrheidiol gyda chyrff ymgynghori perthnasol fel yr EA, CNC ac NE.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol ddarparu asesiad o effeithiau INNS lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.3.7	Paragraff 8.36 a Thabl 8.2	Asesiad ac arolygon penodol i rywogaeth ar gyfer infertebratau, pysgod, ysgyfarnogod brown, llygod yr ŷd, draenogod, ffyngau – adeiladu a gweithredu	Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth wedi cael ei darparu am bresenoldeb infertebratau, ysgyfarnogod brown, llygod yr ŷd, draenogod a ffyngau, ac effeithiau tebygol arnynt, i gyfiawnhau hepgor asesiad ac arolygon penodol ar gyfer y rhywogaethau hyn. Mae'r Arolygiaeth yn nodi'r posibilrwydd o danddaearu ceblau. Pan allai ceblau tanddaear groesi cyrsiau dŵr, dylid asesu effeithiau ar y cyrsiau dŵr hyn a'r poblogaethau pysgod maen nhw'n eu cynnal.
			Dylai'r Datganiad Amgylcheddol ddarparu arolygon ac asesiadau ar gyfer y rhywogaethau hyn lle mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE. Tynnir sylw'r Ymgeisydd at ymateb CNC i'r ymgynghoriad (Atodiad 2 y Farn hon) ynglŷn â chofnodion ffawna infertebratau a'r angen am asesiad.
3.3.8	Paragraff 8.32	Arolygon ystlumod sy'n clwydo – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor arolygon ystlumod sy'n clwydo ar y sail y byddai sawl blwyddyn rhwng arolygon maes ecolegol a dechrau'r cam adeiladu, pryd y gallai clwydfannau a nodweddion clwydo posibl mewn coed fod wedi ymddangos neu ddiflannu. Mae'r Adroddiad Cwmpasu yn cynnig cynnal asesiad o botensial blociau coetir i gynnal ystlumod trwy arolygon synwyryddion sefydlog. Wrth ddethol y llwybr terfynol, bydd coed yr effeithir arnynt yn cael eu hasesu ar gyfer y potensial i gynnal clwydfannau ystlumod a bydd coed categori canolig/ uchel yn cael eu dringo, eu harolygu neu eu hosgoi trwy ficroleoli. Mae'r Adroddiad Cwmpasu yn datgan ymhellach y gellir gosod amod ar gyfer arolygon ystlumod cyn dechrau, ac y gellid defnyddio trwyddedau os bydd angen.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Mae'r Arolygiaeth yn cytuno bod yr ymagwedd hon yn un gymesur at arolygu ystlumod sy'n clwydo ac yn cytuno y gellir hepgor arolygon ystlumod sy'n clwydo. Dylai arolygon a mesurau lliniaru arfaethedig cyn dechrau ar gyfer ystlumod gael eu disgrifio'n glir yn y Datganiad Amgylcheddol a'u sicrhau trwy'r dDCO. Er mwyn osgoi amheuaeth, ac yn seiliedig ar baragraff 8.32 yr Adroddiad Cwmpasu, mae'r Arolygiaeth yn deall bod effeithiau ar ystlumod sy'n clwydo yn ystod adeiladu wedi'u cynnwys yn yr asesiad. Tynnir sylw'r Ymgeisydd at ymateb CNC i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) ynglŷn ag effeithiau ar Ardal Cadwraeth Arbennig (ACA) Safleoedd Ystlumod Tanat ac Efyrnwy, ei nodweddion a chlwydfannau ystlumod o fewn yr ACA ac o fewn Dyffryn Meifod, sef tir sydd wedi'i gysylltu'n swyddogaethol â'r ACA. Dylid gwneud ymdrech i gytuno ar raddau arolygon ac unrhyw fesurau lliniaru angenrheidiol gyda chyrff ymgynghori perthnasol, fel CNC ac NE.
3.3.9	Paragraff 8.24 a Thabl 8.2.	Moch daear – adeiladu a gweithredu	Mae Tabl 8.2 yr Adroddiad Cwmpasu yn cynnig hepgor arolygon ac asesiad o foch daear oherwydd pan fydd brochfeydd moch daear yn bodoli yng nghyffiniau seilwaith y Datblygiad Arfaethedig, cynigir addasu'r gwaith er mwyn cadw'r brochfeydd. Mae'r wybodaeth hon yn cael ei gwrth-ddweud gan baragraff 8.24 yr Adroddiad Cwmpasu, sy'n cynnig cynnwys arolygon moch daear yn seiliedig ar ganlyniadau'r Arolwg Cynefinoedd Cam 1 estynedig.
			Heb wybodaeth fel tystiolaeth sy'n dangos cytundeb clir â chyrff ymgynghori perthnasol, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y materion hyn o'r asesiad. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.3.10	Paragraff 8.36 a Thabl 8.2	Llygod y dŵr – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor arolygon ac asesiad o lygod y dŵr ar y sail y byddai'r Datblygiad Arfaethedig yn osgoi ardaloedd cynefin sy'n gysylltiedig â llygod y dŵr, a phetai'r dybiaeth hon yn newid, byddai'r angen am arolygon llygod y dŵr yn cael ei ailystyried.
			Heb wybodaeth fel tystiolaeth sy'n dangos cytundeb clir â chyrff ymgynghori perthnasol, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y materion hyn o'r asesiad. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.3.11	Paragraff 8.36 a Thabl 8.2	Ymlusgiaid – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor arolygon ac asesiad o ymlusgiaid ar y sail y byddai cynefinoedd yn cael eu trin o dan oruchwyliaeth ecolegol. Mae'r Adroddiad Cwmpasu yn datgan pe na byddai'r dechneg hon yn briodol, byddai'r angen am arolygon ymlusgiaid yn cael ei ailystyried.
			Heb wybodaeth fel tystiolaeth sy'n dangos cytundeb clir â chyrff ymgynghori perthnasol, nid yw'r Arolygiaeth mewn sefyllfa i gytuno i hepgor y materion hyn o'r asesiad. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.3.12	Paragraff 8.4	Ardaloedd astudio	Dylai'r Datganiad Amgylcheddol ddiffinio a chyfiawnhau'r ardaloedd astudio'n glir, yn seiliedig ar Barth Dylanwad (ZoI) y Datblygiad Arfaethedig. Dylai hyn gynnwys ystyriaeth o lwybrau effaith posibl i amlygu ble y gallai LSE ddigwydd ar dderbynnydd, ni waeth am bellter daearyddol oddi wrth ffin y DCO. Dylai hyn gael ei ategu gan ffigurau fel y bo'n briodol.
3.3.13	dd/b	Effeithiau sŵn a dirgryniad ar dderbynyddion ecolegol	Nid yw'n glir p'un a gynigir asesiad o effeithiau ar dderbynyddion ecolegol o ganlyniad i sŵn a dirgryniad. Dylai'r Datganiad Amgylcheddol asesu effeithiau sŵn a dirgryniad ar dderbynyddion ecolegol lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai unrhyw asesiadau o'r fath groesgyfeirio at ganfyddiadau penodau ar agweddau eraill perthnasol. Dylai'r Ymgeisydd hefyd gyfeirio at sylwadau'r Arolygiaeth yn Nhabl 3.7 (Sŵn a Dirgryniad) y Farn hon yn hyn o beth.
3.3.14	dd/b	Camlas Trefaldwyn	Mae cofnodion bod dyfrllys camleswellt, sef planhigyn dyfrol sy'n brin yn genedlaethol, yn bodoli yng Nghamlas Trefaldwyn, Loc Aston – Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) Keeper's Bridge. Lle y gallai'r Datblygiad Arfaethedig effeithio ar y SoDdGA hwn, dylid darparu asesiad o effeithiau ar ddyfrllys camleswellt yn ystod y cam adeiladu. Tynnir sylw'r Ymgeisydd at yr ymatebion i'r ymgynghoriad cwmpasu gan yr EA a Glandŵr Cymru yn hyn o beth (Atodiad 2 y Farn hon).
3.3.15	dd/b	Atodiadau cyfrinachol	Mae gan gyrff cyhoeddus gyfrifoldeb i osgoi rhyddhau gwybodaeth amgylcheddol a allai achosi niwed i nodweddion ecolegol sensitif neu fregus. O ran data arolygu ac asesu penodol sy'n ymwneud â phresenoldeb a lleoliadau rhywogaethau fel moch daear, adar a phlanhigion prin a allai ddioddef aflonyddu, difrod, erledigaeth, neu

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			gamfanteisio masnachol o ganlyniad i gyhoeddi'r wybodaeth, dylai'r data hwnnw gael ei ddarparu yn y Datganiad Amgylcheddol fel atodiad cyfrinachol. Dylai'r holl wybodaeth asesu arall gael ei chynnwys mewn pennod o'r Datganiad Amgylcheddol, yn ôl yr arfer, gyda dalfan testun sy'n esbonio bod atodiad cyfrinachol wedi cael ei gyflwyno i'r Arolygiaeth ac y gellid ei ddarparu ar gais.

3.4 Adareg

(Pennod 9 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.4.1	Paragraff 9.35	Trydaniad – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor trydanu adar ar yr OHL ar y sail na fyddai dyluniad a ffurfweddiad gwifrau a thyrau'r OHL yn caniatáu i drydaniad fod yn bosibl.
			Mae'r Arolygiaeth yn cytuno y gellir hepgor trydanu adar o'r Datganiad Amgylcheddol ar y sail na fyddai dyluniad yr OHL yn caniatáu i drydaniad fod yn bosibl. Dylai'r Datganiad Amgylcheddol ddangos bod y bylchau rhwng y dargludyddion a'r mannau clwydo'n fwy na lled adenydd mwyaf posibl rhywogaethau adar sy'n clwydo.
3.4.2	Paragraff 9.35	Aflonyddu – gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor aflonyddu gweithredol ar y sail na fyddai seilwaith y Datblygiad Arfaethedig yn gofyn am lawer o weithgareddau cynnal a chadw ar y safle. Mae'r Adroddiad Cwmpasu yn datgan ymhellach yr ystyrir bod effeithiau sŵn a gweledol sy'n gysylltiedig â'r is-orsaf gasglu, gwifrau a thyrau, yn rhy isel o ran maint i achosi effeithiau arwyddocaol ar boblogaethau adar.
			Er y disgwylir i weithgareddau cynnal a chadw fod yn gyfyngedig a bod yn annhebygol o arwain at effeithiau arwyddocaol ar boblogaethau adar, heb leoliad diffiniedig ar gyfer seilwaith gweithredol y Datblygiad Arfaethedig, a hyd nes bod sicrwydd ynglŷn â graddau a phresenoldeb rhywogaethau penodol, nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth wedi cael ei rhoi i hepgor effeithiau aflonyddu gweithredol (sŵn a gweledol). Yn unol â hynny, dylai'r Datganiad Amgylcheddol ddarparu asesiad o'r materion hyn lle mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.4.3	Paragraff 9.35	Effeithiau ar boblogaethau nad ydynt yn sensitif – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor asesiad manwl o boblogaethau adar sy'n bresennol ond sy'n ddigon helaeth, difygythiad a chydnerth mewn perthynas â'r effeithiau posibl sy'n deillio o'r Datblygiad Arfaethedig.
			Dylai'r Datganiad Amgylcheddol esbonio sut y penderfynwyd bod poblogaethau adar "yn ddigon helaeth, difygythiad a chydnerth mewn perthynas â'r effeithiau posibl", gan gyfeirio at ddata sylfaenol, canllawiau perthnasol a barn broffesiynol. Dylai'r Ymgeisydd wneud ymdrech i gytuno ar y rhestr o boblogaethau adar i'w hasesu gyda chyrff ymgynghori perthnasol. Yn amodol ar hyn, mae'r Arolygiaeth yn cytuno i hepgor y mater hwn o asesiad pellach.
3.4.4	Paragraff 9.39 a Thabl 9.2	Safleoedd rhyngwladol a chenedlaethol a ddynodwyd ar gyfer adar – adeiladu	Mae Paragraff 9.39/ Tabl 9.2 yr Adroddiad Cwmpasu yn cynnig hepgor arolygon adareg ac effeithiau adeiladu ar safleoedd rhyngwladol a chenedlaethol a ddynodwyd ar gyfer adar. Nid yw'n glir beth a olygir gan hyn gan nad yw Tabl 9.2 yn cyfeirio at arolygon penodol. Mae'r cyfiawnhad a roddwyd yn datgan mai'r unig safle perthnasol yw safle Ramsar Midland Meres and Mosses lle na fyddai'r gwaith adeiladu yn tarfu ar nodweddion adaregol dynodedig.
			Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth wedi cael ei darparu ynglŷn ag effeithiau adeiladu ar safleoedd rhyngwladol a chenedlaethol a ddynodwyd ar gyfer adar.
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn lle mae effeithiau arwyddocaol yn debygol o ddigwydd, a gefnogir gan ddata sylfaenol, neu wybodaeth sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Dylai'r Datganiad Amgylcheddol fynd i'r afael â ph'un a yw unrhyw ardaloedd yn y Coridor Cwmpasu yn darparu tir sydd wedi'i gysylltu'n swyddogaethol (FLL) â safle Ramsar Midland Meres and Mosses, y gallai'r Datblygiad Arfaethedig effeithio arno. Dylai unrhyw FLL y mae'n debygol yr effeithir arno fod yn rhan o'r asesiad hefyd.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.4.5	Paragraff 9.3	Ardal astudio	Dylai'r Datganiad Amgylcheddol ddiffinio a chyfiawnhau'r ardal astudio'n glir, yn seiliedig ar y Parth Dylanwad (ZoI) o'r Datblygiad Arfaethedig a'r llwybrau effaith posibl i safleoedd dynodedig.
3.4.6	Paragraffau 9.3 a 9.16	Arolygon ar gyfer rhywogaethau adar	Mae'r Adroddiad Cwmpasu yn datgan y bydd blwyddyn lawn o arolygon adaregol yn cael eu cynnal. Dylai hyd a lled gofodol, nifer yr ymweliadau a hyd y gyfres o arolygon adar a gynigir gael eu cyfiawnhau'n llawn yn y Datganiad Amgylcheddol a'u cefnogi gan ffigurau clir. Dylai'r ymagwedd arolygu fod yn ddigonol i fynd i'r afael ag unrhyw ardaloedd FLL y mae'r Datblygiad Arfaethedig yn debygol o effeithio arnynt. Dylid gwneud ymdrech i gytuno ar hyd a lled a chwmpas yr arolygon gyda chyrff ymgynghori perthnasol, gan gynnwys NE a CNC.
3.4.7	dd/b	Effeithiau sŵn a dirgryniad ar dderbynyddion adaregol	Nid yw'n glir p'un a gynigir asesu effeithiau ar dderbynyddion adaregol o ganlyniad i sŵn a dirgryniad. Dylai'r Datganiad Amgylcheddol asesu effeithiau sŵn a dirgryniad ar dderbynyddion adaregol lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai unrhyw asesiadau o'r fath groesgyfeirio at ganfyddiadau penodau ar agweddau eraill perthnasol. Dylai'r Ymgeisydd hefyd gyfeirio at

Rhi Adn boo		Disgrifiad	Sylwadau'r Arolygiaeth
			sylwadau'r Arolygiaeth yn Nhabl 3.7 (Sŵn a Dirgryniad) y Farn hon yn hyn o beth.
3.4.8	dd/b	Atodiadau cyfrinachol	Cyfeiriwch at sylwadau'r Arolygiaeth yn Nhabl 3.3 uchod.

3.5 Yr Amgylchedd Hanesyddol

(Pennod 10 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.5.1	Paragraff 10.45 a Thabl 10.1	Effeithiau ffisegol uniongyrchol ar asedau treftadaeth – gweithredu (gan gynnwys cynnal a chadw)	Mae'r Adroddiad Cwmpasu yn datgan y bydd effeithiau ffisegol uniongyrchol ar asedau treftadaeth yn digwydd yn ystod adeiladu'r Datblygiad Arfaethedig yn unig. Ar y sail y byddai cynnal a chadw neu atgyweirio nodweddion o dan yr wyneb yn gyfyngedig i ardaloedd y tarfwyd arnynt ac a liniarwyd yn flaenorol yn ystod adeiladu a bod yr ymrwymiad hwn yn cael ei sicrhau trwy'r dDCO (neu ddull cyfreithiol arall), mae'r Arolygiaeth o'r farn bod effeithiau arwyddocaol yn annhebygol o ddigwydd. Gellir hepgor effeithiau ffisegol uniongyrchol ar asedau treftadaeth yn ystod gweithredu (gan gynnwys cynnal a chadw) o'r Datganiad Amgylcheddol.
3.5.2	Paragraff 10.45 a Thabl 10.1	Effeithiau ffisegol uniongyrchol ar asedau treftadaeth y tu hwnt i ôl troed y Datblygiad Arfaethedig – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn datgan na fydd unrhyw effeithiau ffisegol uniongyrchol ar asedau treftadaeth y tu hwnt i ôl troed y Datblygiad Arfaethedig, oherwydd gall effeithiau ffisegol uniongyrchol ddigwydd o fewn yr ardaloedd lle y bydd gwaith adeiladu'n digwydd yn unig. Mae'r Arolygiaeth yn cytuno bod effeithiau arwyddocaol yn annhebygol o ddigwydd. Gellir hepgor effeithiau ffisegol uniongyrchol ar asedau treftadaeth y tu hwnt i ôl troed y Datblygiad Arfaethedig o'r Datganiad Amgylcheddol.
3.5.3	Paragraff 10.45 a Thabl 10.1	Effeithiau ffisegol anuniongyrchol ar asedau treftadaeth – adeiladu	Mae'r Adroddiad Cwmpasu yn datgan, o ystyried natur y Datblygiad Arfaethedig a'r amgylchedd sy'n ei dderbyn, na ragwelir effeithiau ffisegol anuniongyrchol ar asedau treftadaeth y tu hwnt i ôl troed y Datblygiad Arfaethedig.
			Mae Ffigur 10.1 yr Adroddiad Cwmpasu yn dangos asedau treftadaeth niferus sydd wedi'u lleoli'n agos i'r Datblygiad Arfaethedig. Heb

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			leoliadau diffiniedig ar gyfer y gwaith (gan gynnwys llwybr(au) disgwyliedig traffig adeiladu/ ffyrdd cludo) a strwythurau arfaethedig, nid yw'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn. Dylai effeithiau ffisegol anuniongyrchol ar asedau treftadaeth yn ystod adeiladu (e.e. ymsuddiant; dirgryniad o ganlyniad i osod seilbyst, cerbydau nwyddau trwm (HGVau) ac unrhyw ffrwydro creigiau; newidiadau i lifoedd a lefelau dŵr daear; symudiad halogyddion neu lygryddion) gael eu hasesu yn y Datganiad Amgylcheddol lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
3.5.4	Paragraff 10.45 a Thabl 10.1	treftadaeth o ganlyniad i newid i'w	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn ar sail natur dros dro gweithgareddau adeiladu.
			Mae Ffigur 10.1 yr Adroddiad Cwmpasu yn dangos asedau treftadaeth niferus sydd wedi'u lleoli'n agos i'r Datblygiad Arfaethedig. Heb leoliadau diffiniedig ar gyfer y cyfadeiladau adeiladu, nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth i gasglu na fydd effeithiau arwyddocaol yn digwydd. Felly, dylai effeithiau ar leoliad asedau treftadaeth o ganlyniad i gyfadeiladau adeiladu gael eu cynnwys yn yr asesiad lle mae effeithiau arwyddocaol yn debygol o ddigwydd.
			Mae'r Arolygiaeth yn fodlon bod effeithiau uniongyrchol eraill ar asedau treftadaeth sy'n deillio o newid i'w lleoliad yn ystod adeiladu yn annhebygol o fod yn arwyddocaol ac y gellir eu hepgor.
3.5.5	Paragraff 10.45 a Thabl 10.1	Effeithiau yn ystod datgomisiynu	Gweler y sylw yn Nhabl 3.1 y Farn hon. Mae'r Arolygiaeth yn cytuno y gellir hepgor datgomisiynu o'r Datganiad Amgylcheddol, yn amodol ar atodi crynodeb lefel uchel o effeithiau posibl ar gyfer pob agwedd amgylcheddol i'r Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.5.6	Paragraff 3.52	Cwympo coed	Mae'r Adroddiad Cwmpasu yn esbonio y bydd angen cwympo coed yn rhan o'r Datblygiad Arfaethedig. Os yw'r llystyfiant sydd i'w gwympo'n cyfrannu at leoliad asedau treftadaeth neu gymeriad y dirwedd, dylid ystyried hyn yn yr asesiad o'r Amgylchedd Hanesyddol yn y Datganiad Amgylcheddol.
3.5.7	Paragraffau 10.28 a 10.29	Effeithiau ar leoliad	Mae'r Adroddiad Cwmpasu yn datgan y bydd y ZTV/au (sydd i'w datblygu ar gyfer yr LVIA) yn cael eu defnyddio i amlygu asedau treftadaeth a allai fod yn agored i effeithiau yn ymwneud â newid i'w lleoliad.
			Fel yr amlinellwyd yn Adran 3.2 uchod (Tirwedd ac Amwynder Gweledol), mae'r Arolygiaeth o'r farn y dylai'r ardal astudio a'r ZTV gynrychioli hyd a lled yr effeithiau tebygol o adeiladu a gweithredu'r Datblygiad Arfaethedig a'r holl strwythurau arfaethedig, gan gynnwys yr is-orsaf gasglu. Dylai'r Ymgeisydd wneud ymdrech i gytuno ar yr ardal astudio a'r fethodoleg ar gyfer y ZTV gyda chyrff ymgynghori perthnasol, gan gynnwys awdurdodau lleol.
			Yn ogystal â'r ZTV/au, dylid defnyddio asesiad/au agwedd eraill perthnasol (e.e. Sŵn a Dirgryniad) i amlygu asedau treftadaeth a allai fod yn agored i effeithiau yn ymwneud â newid i'w lleoliad.
			Dylai'r Datganiad Amgylcheddol lwyr gyfiawnhau'r asedau treftadaeth y dewiswyd eu cynnwys yn yr asesiad o leoliadau, a dylid dangos eu lleoliadau ar gynllun ategol.
			Dylai'r asesiad gael ei gefnogi gan ddelweddau priodol, fel ffotogyfosodiadau, i helpu i ddangos effeithiau tebygol y Datblygiad Arfaethedig. Dylid gwneud ymdrech i gytuno ar leoliadau ar gyfer golygfannau a delweddau gyda chyrff ymgynghori perthnasol, gan gynnwys awdurdodau lleol, Cadw a Historic England. Gellir

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			croesgyfeirio at yr asesiad Tirwedd ac Amwynder Gweledol yn y Datganiad Amgylcheddol er mwyn osgoi dyblygu.
3.5.8	Paragraffau 10.31 i 10.33	Asesiad Desg o'r Amgylchedd Hanesyddol (HEDBA)	Mae'r Adroddiad Cwmpasu yn datgan y bydd canlyniadau'r broses asesu'n cael eu hadrodd fel HEDBA (sy'n ymdrin ag amodau sylfaenol, amlygu asedau treftadaeth ac effeithiau tebygol). Bwriedir crynhoi casgliadau'r HEDBA yn y Bennod ar yr Amgylchedd Hanesyddol yn y Datganiad Amgylcheddol.
			Dylai'r Bennod ar yr Amgylchedd Hanesyddol yn y Datganiad Amgylcheddol gynnwys crynodeb o'r asesiad yn yr HEDBA ac amlygu unrhyw effeithiau arwyddocaol ar asedau treftadaeth. Dylid atodi'r HEDBA i'r Bennod ar yr Amgylchedd Hanesyddol yn y Datganiad Amgylcheddol.
3.5.9	Paragraffau 10.5 a 10.30 i	Casglu data – seiliedig wrth ddesg	Dylid dadansoddi data Canfod a Mesur Golau (Lidar) yn llawn ar gyfer safle'r cais. Mae Cadw wedi cynghori bod setiau data Lidar newydd ar gael (gweler Atodiad 2 y Farn hon).
	10.33		Dylai'r Ymgeisydd wneud ymdrech i drafod a chytuno ar yr angen am fodel desg rhagarweiniol o ddyddodion yn rhan o'r HEDBA gyda Historic England a Cadw, i lywio cwmpas a hyd a lled arolygon maes archaeolegol sy'n ofynnol i gadarnhau'r sefyllfa sylfaenol mewn lleoliadau lle y gallai arolygon geoffisegol fod yn heriol o ganlyniad i amodau'r safle.
3.5.10	Paragraffau 10.34 a 10.35	Casglu data – arolygon maes	Fel y datganwyd ym mharagraff 10.34 yr Adroddiad Cwmpasu, disgwylir y bydd angen rhyw fath o arolygon geoffisegol wedi'u targedu i lywio'r AEA. Nid oes cadarnhad ar hyn o bryd p'un a gynigir ymchwiliadau ymwthiol a/ neu ffosydd treialu, ond mae'r Adroddiad Cwmpasu yn nodi y byddai ymgynghoriad ychwanegol yn cael ei

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			gynnal gyda chyrff ymgynghori perthnasol i gadarnhau cwmpas yr arolygon maes a fyddai'n ofynnol.
			Lle y bo'r angen, dylai unrhyw ymchwiliadau ymwthiol a ffosydd treialu gael eu cwblhau cyn cyflwyno'r cais DCO. Dylai'r Ymgeisydd wneud ymdrech i drafod a chytuno ar yr amseriad, y cwmpas a'r fethodoleg ar gyfer arolygon geoffisegol, unrhyw ymchwiliadau ymwthiol a ffosydd treialu gyda chyrff ymgynghori perthnasol.
3.5.11	Paragraff 10.46	Mesurau Iliniaru	Dylai'r Datganiad Amgylcheddol ddisgrifio'r mesurau lliniaru arfaethedig ac esbonio sut byddai'r rhain yn cael eu sicrhau trwy'r dDCO, gan gynnwys cynigion ar gyfer cofnodi unrhyw archaeoleg a fyddai'n cael ei cholli'n barhaol o ganlyniad i'r Datblygiad Arfaethedig. Dylid gwneud ymdrech i gytuno ar y mesurau angenrheidiol gyda chyrff ymgynghori perthnasol.

3.6 Traffig a Thrafnidiaeth

(Pennod 11 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.6.1	Paragraff 11.23 a Thabl 11.1	Effeithiau traffig a thrafnidiaeth – gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor effeithiau traffig a thrafnidiaeth sy'n gysylltiedig â gweithredu, ar y sail y byddai unrhyw draffig gweithredol yn gyfyngedig i weithgareddau cynnal a chadw ac archwilio arferol. Mae'r Arolygiaeth yn cytuno bod nifer y teithiau cerbydol a gynhyrchir yn sgil gweithredu'r Datblygiad Arfaethedig yn annhebygol o arwain at effeithiau arwyddocaol, ac mae'n fodlon hepgor y mater hwn. Dylai'r bennod Disgrifiad o'r Prosiect yn y Datganiad Amgylcheddol amlinellu'n glir nifer debygol a math tebygol y cerbydau gweithredu a chynnal a chadw.
3.6.2	Paragraff 11.23	Effeithiau traffig a thrafnidiaeth – datgomisiynu	Gweler y sylw yn Nhabl 3.1 y Farn hon. Mae'r Arolygiaeth yn cytuno y gellir hepgor datgomisiynu o'r Datganiad Amgylcheddol, yn amodol ar atodi crynodeb lefel uchel o effeithiau posibl ar gyfer pob agwedd amgylcheddol i'r Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.6.3	Paragraff 3.25	Llwythi anghyffredin	Os bydd y sefyllfa'n newid a bydd angen unrhyw lwythi anghyffredin yn ystod adeiladu'r Datblygiad Arfaethedig, dylid asesu eu heffeithiau cysylltiedig yn y Datganiad Amgylcheddol. Dylai'r asesiad ystyried effeithiau ar bontydd, cwlfertau a chyffyrdd y Rhwydwaith Ffyrdd Strategol, yn ogystal ag effeithiau cronnol posibl ar y rhwydwaith ffyrdd gyda datblygiadau eraill yr ymrwymwyd iddynt.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.6.4	Paragraffau 11.2, 11.3 ac 11.11 i 11.13	Ardal astudio a chasglu data	Dylai'r Datganiad Amgylcheddol gadarnhau'r ardal astudio derfynol ar gyfer yr asesiad a chyfiawnhau sut y'i dewiswyd, gan gyfeirio at ganllawiau perthnasol y diwydiant, graddau'r effeithiau tebygol a lleoliadau derbynyddion sensitif. Dylai cynllun sy'n dangos hyd a lled yr ardal astudio a llwybr(au) disgwyliedig traffig adeiladu gael ei gynnwys yn y Datganiad Amgylcheddol.
			Nid yw'r Adroddiad Cwmpasu yn disgwyl y bydd angen unrhyw arolygon maes, gan fod cryn dipyn o ddata ar gael i'r cyhoedd eisoes. Er mwyn rhoi sicrwydd bod yr asesiad o LSE wedi'i ategu gan set ddata gadarn, dylai'r Datganiad Amgylcheddol gynnwys cyfiawnhad i gefnogi graddau'r data a gasglwyd, gan gynnwys sut mae'r data a gasglwyd yn ymwneud â llwybr(au) disgwyliedig traffig adeiladu. Dylid gwneud ymdrech i gytuno ar yr ardal astudio a'r angen am unrhyw arolygon maes gyda chyrff ymgynghori perthnasol.
3.6.5	Paragraffau 11.11 i 11.13	Effeithiau ar ddefnyddwyr PRoW	Dylai'r asesiad o effeithiau ar ddefnyddwyr PRoW gael ei ategu gan gyfrifiadau cerddwyr/ defnyddwyr lle y bo'n bosibl, a dylid gwneud ymdrech i gytuno ar leoliadau ar gyfer cyfrifiadau o'r fath gyda chyrff ymgynghori perthnasol. Lle y bo'n berthnasol, dylai'r Datganiad Amgylcheddol asesu rhyngweithiadau posibl rhwng asesiadau o agweddau (er enghraifft, traffig a thrafnidiaeth, sŵn, llwch, hamdden ac effaith weledol). Dylid dangos lleoliadau unrhyw wyriadau neu gau llwybrau ar ffigurau addas yn y Datganiad Amgylcheddol.
3.6.6	Paragraffau 11.18, 12.27 a 12.28	Mesurau Iliniaru	Lle mae'r Datganiad Amgylcheddol yn dibynnu ar fesurau lliniaru a fyddai'n cael eu sicrhau trwy'r Cynllun Rheoli Traffig Adeiladu amlinellol, dylid dangos (gan groesgyfeirio'n glir) ble mae pob mesur wedi'i nodi yn y ddogfen amlinellol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.6.7	dd/b	Effeithiau o gludo gwastraff	Dylai unrhyw LSE sy'n deillio o gludo gwastraff a gynhyrchir yn ystod adeiladu'r Datblygiad Arfaethedig gael eu hasesu yn y Datganiad Amgylcheddol. Dylai unrhyw dybiaethau a wnaed (megis mewn perthynas â symiau tir halogedig) gael eu nodi'n glir a'u cyfiawnhau yn y Datganiad Amgylcheddol.

3.7 Sŵn a Dirgryniad

(Pennod 12 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.7.1	Paragraff 12.15	Effeithiau sŵn a dirgryniad ar dderbynyddion masnachol a diwydiannol – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor derbynyddion masnachol a diwydiannol, gan ddatgan bod derbynyddion o'r math hwn yn llai sensitif i sŵn a dirgryniad ac nad yw NPS EN-1 na Nodyn Cyngor Technegol (TAN) 11: Sŵn yn nodi eu bod yn sensitif i sŵn.
			Ar yr adeg hon, nid oes cadarnhad p'un a oes unrhyw dderbynyddion masnachol a diwydiannol o fewn yr ardaloedd astudio sŵn a dirgryniad a amlinellir ym mharagraffau 12.2 i 12.5 yr Adroddiad Cwmpasu, ac nid oes lleoliadau wedi'u diffinio ar gyfer y gwaith a'r strwythurau arfaethedig. Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth ar hyn o bryd i hepgor y mater hwn o asesiad pellach.
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o effeithiau sŵn a dirgryniad ar dderbynyddion masnachol a diwydiannol, neu wybodaeth i ddangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.7.2	Paragraff 12.19	Arolygon sylfaenol sŵn neu ddirgryniad ar gyfer safleoedd ecolegol	Mae paragraff 12.19 yr Adroddiad Cwmpasu yn datgan na chynigir unrhyw arolygon sylfaenol sŵn na dirgryniad ar gyfer unrhyw safleoedd ecolegol ac mae'n nodi bod y mater hwn wedi'i hepgor. Ni roddir unrhyw gyfiawnhad ategol.
			Heb leoliadau diffiniedig ar gyfer y gwaith (gan gynnwys llwybr(au) disgwyliedig traffig adeiladu/ ffyrdd cludo) a strwythurau arfaethedig, nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn.
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o effeithiau sŵn a dirgryniad ar dderbynyddion ecolegol, neu

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			wybodaeth i ddangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.7.3	Paragraffau 12.35 a 12.38 a Thabl 12.1	Dirgryniad o draffig – adeiladu	Mae'r Arolygiaeth yn nodi rhywfaint o anghysondeb rhwng paragraffau 12.35, 12.38 a Thabl 12.1 yr Adroddiad Cwmpasu, sy'n golygu ei bod yn aneglur p'un a yw'r Ymgeisydd yn bwriadu cynnwys neu hepgor effeithiau dirgryniad o draffig adeiladu.
			Mae'r Adroddiad Cwmpasu yn nodi bod sŵn a dirgryniad byrhoedlog yn gallu digwydd ar brydiau pan fydd cerbydau trwm yn mynd heibio i anheddau ar bellterau gwahanu byr iawn. Mae'r Arolygiaeth o'r farn, heb fanylion ynglŷn â llwybr(au) disgwyliedig traffig adeiladu a nifer ddisgwyliedig y symudiadau cerbydol yn ystod y cam adeiladu, nad oes digon o wybodaeth ar hyn o bryd i hepgor y mater hwn o asesiad pellach.
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o effeithiau dirgryniad o draffig adeiladu, neu wybodaeth i ddangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.7.4	Paragraffau 12.39 i 12.41 a Thabl 12.1	 Sŵn o OHLau a cheblau tanddaear – gweithredu a chynnal a chadw; a Sŵn o bob ffynhonnell – cynnal 	Mae'r Adroddiad Cwmpasu yn datgan na fyddai gweithrediad ceblau tanddaear yn cynhyrchu unrhyw sŵn a bod y lefelau sŵn rhagfynedig o OHLau 132kV yn ystod yr amodau achos gwaethaf yn isel iawn (llai nag 20 dB(A)).
	a chadw		Dylai'r Datganiad Amgylcheddol esbonio sut byddai dyluniad yr OHL arfaethedig yn sicrhau na fyddai'r lefelau sŵn rhagfynedig yn cael eu torri a sut byddai hyn yn cael ei sicrhau. Yn amodol ar hyn, mae'r Arolygiaeth yn cytuno bod gweithredu'r OHL (gan gynnwys y CSEC) a cheblau tanddaear yn annhebygol o gynhyrchu sŵn ar raddfa a fyddai'n arwain at effeithiau arwyddocaol, ac mae'n cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			O ran cynnal a chadw, mae'r Adroddiad Cwmpasu yn datgan y byddai sŵn o weithgareddau cynnal a chadw am gyfnodau cyfyngedig iawn ac yn annhebygol o arwain at unrhyw effeithiau arwyddocaol. Mae'r Arolygiaeth yn cytuno y gellir hepgor sŵn o weithgareddau cynnal a chadw tymor byr o'r Datganiad Amgylcheddol. Fodd bynnag, dylai'r Datganiad Amgylcheddol ystyried y posibilrwydd y bydd angen gweithgarwch mwy sylweddol yn rhan o gynnal a chadw, er enghraifft amnewid elfennau o'r Datblygiad Arfaethedig, a fyddai'n debycach i'r effeithiau a ddisgrifiwyd yn ystod y cam adeiladu. Dylai'r Datganiad Amgylcheddol gynnwys asesiad o unrhyw LSE.
3.7.5	Paragraff 12.42 a Thabl 12.1	Sŵn a dirgryniad o draffig – gweithredu a chynnal a chadw	Mae'r Arolygiaeth yn cytuno bod sŵn a dirgryniad o draffig a gynhyrchir yn sgil gweithredu a chynnal a chadw'r Datblygiad Arfaethedig yn annhebygol o arwain at effeithiau arwyddocaol. Gellir hepgor y mater hwn.
3.7.6	Paragraff 12.43 a Thabl 12.1	Dirgryniad – gweithredu a chynnal a chadw	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn gan nad yw'r seilwaith sy'n ffurfio rhan o'r Datblygiad Arfaethedig yn ystod gweithredu yn debygol o gynhyrchu unrhyw beth heblaw am lefelau dibwys o ddirgryniad.
			Nid yw'r Adroddiad Cwmpasu yn cynnwys unrhyw wybodaeth i ddisgrifio nodweddion dirgryniad yr is-orsaf gasglu yn ystod gweithredu. Heb y wybodaeth hon a heb leoliad diffiniedig ar gyfer yr elfen hon (ac felly, cadarnhad o'r pellter i dderbynyddion sensitif), nid yw'r Arolygiaeth mewn sefyllfa i hepgor y mater hwn. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o effeithiau dirgryniad gweithredol o'r is-orsaf gasglu, neu wybodaeth i ddangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
			Mae'r Arolygiaeth yn fodlon nad oes unrhyw ddirgryniad a gynhyrchir trwy gynnal a chadw'r is-orsaf gasglu, neu drwy weithredu a chynnal

Rhif Adna bod	_	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			a chadw elfennau eraill o'r Datblygiad Arfaethedig, yn debygol o arwain at effeithiau arwyddocaol ac y gellir ei hepgor.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.7.7	Paragraffau 12.3 i 12.5 a 12.15	Ardaloedd astudio a derbynyddion sensitif	Dylai'r Datganiad Amgylcheddol gadarnhau'r ardaloedd astudio terfynol ar gyfer yr asesiad a chyfiawnhau sut y'u dewiswyd, gan gyfeirio at ganllawiau perthnasol y diwydiant, graddau'r effeithiau tebygol a lleoliadau derbynyddion sensitif.
			Mae Paragraff 12.15 yr Adroddiad Cwmpasu yn datgan y bydd derbynyddion sensitif yn cynnwys anheddau preswyl, yn ogystal ag ysgolion a chyfleusterau gofal iechyd (os yw'n berthnasol). Yn unol â sylwadau'r Arolygiaeth uchod, dylid ystyried derbynyddion masnachol a diwydiannol yn dderbynyddion hefyd, fel y bo'n berthnasol.
			Ni chyfeirir at fathau eraill o dderbynyddion a allai fod yn sensitif i effeithiau sŵn a dirgryniad, fel derbynyddion hamdden, treftadaeth neu ecolegol. Dylai'r Datganiad Amgylcheddol asesu effeithiau sŵn a dirgryniad ar dderbynyddion hamdden, treftadaeth ac ecolegol (fel y cyfeiriwyd atynt yn Rhif Adnabod 3.7.2 uchod) lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Dylai unrhyw asesiadau o'r fath groesgyfeirio at ganfyddiadau penodau ar agweddau eraill perthnasol.
			Dylid gwneud ymdrech i gytuno ar yr ardaloedd astudio a derbynyddion sensitif gyda chyrff ymgynghori perthnasol.
			Dylai'r Datganiad Amgylcheddol gynnwys ffigurau priodol i ddangos yr ardaloedd astudio a lleoliadau derbynyddion sensitif.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.7.8	Paragraffau 12.20 i 12.23	Dull asesu	Er bod yr Arolygiaeth yn cydnabod y bwriedir i'r fethodoleg ddilyn Safonau Prydeinig a chanllawiau perthnasol fel y'u rhestrir ym mharagraffau 12.20 i 12.23 yr Adroddiad Cwmpasu, nid yw'r Adroddiad Cwmpasu yn esbonio sut bydd y methodolegau hyn yn cael eu cymhwyso a sut bydd effeithiau arwyddocaol yn cael eu pennu. Dylid mynd i'r afael â hyn yn y Datganiad Amgylcheddol.

3.8 Adnoddau Dŵr

(Pennod 13 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.8.1	Paragraffau 13.31 a 13.32 a Thabl 13.1	Effeithiau ar ansawdd dŵr gan gynnwys draenio – adeiladu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor effeithiau ar ansawdd dŵr yn ystod adeiladu, gan ddatgan y byddai mesurau lliniaru safonol yn y Cynllun Rheoli Amgylchedd Adeiladu (CEMP) amlinellol a Chynllun Rheoli Dŵr Wyneb (SWMP) ar gyfer y cam adeiladu yn dileu'r llwybr rhwng y ffynhonnell a derbynyddion ar gyfer y rhan fwyaf o'r amgylchedd gweithio. Mae'r Adroddiad Cwmpasu hefyd yn datgan y defnyddir technegau di-ffos i leihau'r risg bosibl ar gyfer croesfannau cyrsiau dŵr yn ystod adeiladu.
			Mae'r Arolygiaeth yn nodi nad oes penderfyniad wedi'i wneud eto ynglŷn â manylion y dulliau gweithio ar gyfer y croesfannau cyrsiau dŵr trwy geblau tanddaear a/neu seilwaith ar y tir, a'u hunion leoliadau. Felly, nid oes digon o wybodaeth yn yr Adroddiad Cwmpasu i bennu graddfa croesfannau neu draciau mynediad ar draws cyrsiau dŵr ac am ba hyd y byddent yn eu lle.
			Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth ar gael ar yr adeg hon i hepgor effeithiau ar ansawdd dŵr yn ystod adeiladu. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r mater hwn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
			Dylai'r Datganiad Amgylcheddol gynnwys manylion ynglŷn â sut y bwriedir dal, trin a gwaredu unrhyw ddŵr yn ystod adeiladu o ran dad-ddyfrio, cloddiadau a ffosydd, yn enwedig yn agos i'r croesfannau cyrsiau dŵr.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.8.2	Paragraffau 13.33 i 13.35 a Thabl 13.1	Effeithiau ar ansawdd dŵr gan gynnwys draenio – gweithredu	Mae'r Adroddiad Cwmpasu yn datgan y bydd dyluniad yr is-orsaf gasglu a'r CSEC yn cynnwys strategaeth ddraenio ffurfiol. Mae'r Adroddiad Cwmpasu yn datgan ymhellach na fydd unrhyw ollyngiadau gweithredol ac y bydd yr holl weithgareddau cynnal a chadw'n cael eu gwneud yn unol ag arfer gorau a gofynion gweithgynhyrchwyr. Felly, ni ddisgwylir unrhyw LSE ar ansawdd dŵr yn ystod y cam gweithredol.
			Mae'r Arolygiaeth yn cytuno, ar yr amod bod y mesurau i liniaru risgiau llygru cyrsiau dŵr yn cael eu disgrifio'n glir yn y Datganiad Amgylcheddol a'u sicrhau yn y dDCO, nad yw effeithiau arwyddocaol yn debygol o ddigwydd a gellir hepgor y mater hwn o asesiad pellach. Dylai fersiwn ddrafft/ amlinellol o'r strategaeth ddraenio ffurfiol ar gyfer yr is-orsaf gasglu a'r CSEC gael ei chynnwys gyda'r cais DCO.
3.8.3	Paragraffau 13.36 i 13.38 a Thabl 13.1	Effeithiau ar hydroleg (gan gynnwys prif afonydd, cyrsiau dŵr cyffredin a chyflenwadau dŵr preifat) – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor effeithiau ar hydroleg yn ystod adeiladu a gweithredu, ar y sail na ddisgwylir LSE ar fuddiannau dŵr presennol, gan gynnwys cyflenwadau dŵr preifat, o ganlyniad i natur y Datblygiad Arfaethedig. Mae'r Adroddiad Cwmpasu yn datgan y byddai'r posibilrwydd o darfu'n ffisegol ar gyrsiau dŵr dros dro ac yn parhau am gyfnod byr.
			Mae'r Arolygiaeth yn nodi nad oes penderfyniad wedi'i wneud eto ar fanylion ac union leoliadau'r gwaith adeiladu ger cyflenwadau dŵr preifat, o fewn cyrsiau dŵr ac adeiladu traciau mynediad ar draws cyrsiau dŵr. Nid oes digon o wybodaeth yn yr Adroddiad Cwmpasu i bennu eu graddfa ac am ba hyd y byddent yn eu lle. Nid yw'r Adroddiad Cwmpasu yn disgrifio pa fesurau a fyddai'n cael eu cynnig i adfer unrhyw gyrsiau dŵr yr effeithir arnynt ar ôl adeiladu, ac felly unrhyw oblygiadau parhaus o weithgarwch adeiladu yn ystod gweithredu.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Nid yw'r Arolygiaeth o'r farn bod digon o wybodaeth ar gael ar yr adeg hon i hepgor y mater hwn. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r materion hyn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.8.4	Paragraffau 13.41 a 13.42 a Thabl 13.1	Perygl llifogydd (dŵr daear, carthffosydd a ffynonellau artiffisial) – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn datgan y bydd y peryglon llifogydd posibl o ffynonellau gan gynnwys dŵr daear, carthffosydd a ffynonellau artiffisial, e.e. cronfeydd dŵr, yn cael eu hasesu yn yr Asesiad Perygl Llifogydd (FRA) ac ystyrir ei bod yn annhebygol, yn seiliedig ar natur y Datblygiad Arfaethedig, y byddai'r ffynonellau llifogydd hyn yn achosi risg bosibl.
			Fodd bynnag, prin yw'r wybodaeth a gyflwynir am y posibilrwydd o berygl llifogydd o'r ffynonellau hyn. Mae'r Arolygiaeth o'r farn nad oes digon o wybodaeth ar yr adeg hon i gasglu bod effeithiau arwyddocaol yn ymwneud â pherygl llifogydd o'r ffynonellau hyn yn ystod adeiladu yn annhebygol. Tynnir sylw'r Ymgeisydd hefyd at y sylwadau gan Glandŵr Cymru (Atodiad 2 y Farn hon).
			Dylai'r Datganiad Amgylcheddol ddarparu asesiad o beryglon llifogydd lle mae effeithiau arwyddocaol yn debygol o ddigwydd, neu wybodaeth i ddangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
3.8.5	Paragraff 13.42 a Thabl 13.1	Perygl llifogydd (afonol a glawol) – gweithredu	Mae'r Adroddiad Cwmpasu yn datgan y bydd mwyafrif y tir sy'n ofynnol ar gyfer y cam adeiladu'n cael ei adfer yn ystod cam gweithredu'r Datblygiad Arfaethedig; bydd yr is-orsaf gasglu a'r CSEC yn cael eu lleoli y tu allan i Barthau Llifogydd 2 a 3 ac ystyrir bod y tyrau'n gydnaws â dŵr (yn amodol ar fesurau lliniaru sydd i'w

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			hamlygu yn yr FRA). Felly, mae'n datgan bod effeithiau posibl ar afonydd a'u gorlifdiroedd yn debygol o fod yn gyfyngedig.
			Mae'r Arolygiaeth yn cytuno nad yw effeithiau gweithredol mewn perthynas â pherygl llifogydd afonol a glawol yn debygol o arwain at effeithiau arwyddocaol ac y gellir eu hepgor. Dylai'r Datganiad Amgylcheddol gynnwys ffigurau priodol i ddangos bod yr is-orsaf gasglu a'r CSEC wedi'u lleoli y tu allan i Barthau Llifogydd 2 a 3. Os bydd yr is-orsaf gasglu a/ neu'r CSEC yn cael eu lleoli o fewn Parth Llifogydd 2 a/ neu 3, dylid darparu asesiad cam gweithredu.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.8.6	Paragraff 13.3 a Thabl 13.1	Effeithiau posibl ar hydroddaeareg, gan gynnwys cyflenwadau dŵr preifat, Ecosystemau Daearol sy'n Dibynnu ar Ddŵr Daear (GWDTE) a thynnu dŵr daear	Mae'r Arolygiaeth yn nodi y bydd hydroddaeareg, gan gynnwys cyflenwadau dŵr preifat a GWDTEau, yn derbyn sylw ym Mhennod 14 y Datganiad Amgylcheddol: Cyflwr y Tir, Daeareg a Hydroddaeareg. Mae'r Arolygiaeth yn fodlon ar yr ymagwedd hon. Dylai'r Asesiad ym Mhennod 14 y Datganiad Amgylcheddol gynnwys croesgyfeiriadau priodol at y penodau ar agweddau perthnasol yn y Datganiad Amgylcheddol, gan gynnwys Adnoddau Dŵr ac Ecoleg.
3.8.7	Paragraffau 13.4 a 13.5	Ardal astudio	Dylai'r Datganiad Amgylcheddol gyfiawnhau defnyddio llain glustogi 250m o amgylch y gosodiad seilwaith terfynol fel yr ardal astudio ar gyfer yr asesiad adnoddau dŵr a disgrifio unrhyw gyrff dŵr sydd wedi'u lleoli y tu allan i'r ardal astudio sefydledig sydd wedi'u cynnwys yn yr asesiad hefyd, gan ddatgan y pellter o'r Datblygiad Arfaethedig, ac esbonio pam mae'r corff dŵr wedi cael ei gynnwys. Dylai hyn gael ei gefnogi gan ffigurau priodol yn y Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.8.8	Paragraff 13.13	Y sefyllfa sylfaenol yn y dyfodol	Cyfeirir yr Ymgeisydd at ymateb Asiantaeth yr Amgylchedd i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) sy'n rhoi cyngor ar ffynhonnell data model ac ystyried canllawiau perthnasol.
3.8.9	Paragraff 13.21	Asesu LSE	Lle y defnyddir barn broffesiynol i bennu p'un a yw effaith a amlygwyd yn arwyddocaol ai peidio yn y Datganiad Amgylcheddol, dylai'r penderfyniad hwn gael ei gefnogi gan dystiolaeth a rhesymau clir a chyfeirio at unrhyw ganllawiau perthnasol.
3.8.10	Paragraff 13.26	Asesiad Sgrinio'r Gyfarwyddeb Fframwaith Dŵr (WFD)	Mae paragraff 13.26 yr Adroddiad Cwmpasu yn datgan y bydd asesiad sgrinio WFD yn cael ei gynnal ar gyfer pob dalgylch hydrolig y mae'r Coridor Cwmpasu yn mynd trwyddo. Tynnir sylw'r Ymgeisydd at Nodyn Cyngor Deunaw yr Arolygiaeth: Y Gyfarwyddeb Fframwaith Dŵr yn hyn o beth.
			Dylai'r Datganiad Amgylcheddol esbonio'r berthynas rhwng y Datblygiad Arfaethedig ac unrhyw gyrff dŵr perthnasol o ran y Cynllun Rheoli Basn Afon perthnasol cyfredol.
3.8.11	dd/b	Effeithiau o ddefnyddio lleidiau drilio	Os bydd angen gwaith drilio cyfeiriadol, dylid asesu effeithiau ar dderbynyddion yn yr amgylchedd dyfrol a derbynyddion adnoddau dŵr o ganlyniad i ddefnyddio lleidiau drilio lle mae effeithiau arwyddocaol yn debygol o ddigwydd.

3.9 Cyflwr y Tir, Daeareg, a Hydroddaeareg

(Pennod 14 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.9.1	Paragraffau 14.27 14.32 a Thabl 14.1	Ansefydlogrwydd tir a mwyngloddio – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn ar y sail bod y Datblygiad Arfaethedig y tu allan i Ardaloedd Risg Uchel Datblygiad Mwyngloddio ac y byddai sefydlogrwydd tir yn cael ei ystyried yn rhan o ddyluniad peirianegol y Datblygiad Arfaethedig, gan ddarparu mesurau lliniaru safonol/ ymgorfforedig lle y bo'r angen. Mae'r Arolygiaeth yn nodi o baragraff 14.12 yr Adroddiad Cwmpasu y bydd hyn yn cynnwys ystyried newidiadau i'r sefyllfa sylfaenol yn y dyfodol, yn enwedig sut gallai'r newid yn yr hinsawdd effeithio ar gyfanrwydd dyddodion pridd a mawn. Mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn ar y sail hon. Fodd bynnag, dylai'r Datganiad Amgylcheddol amlygu unrhyw fesurau lliniaru safonol/ ymgorfforedig y dibynnir arnynt i eithrio LSE ac esbonio sut byddent yn cael eu sicrhau a'u gweithredu yn rhan o'r dDCO.
3.9.2	Paragraffau 14.28 a 14.33 a Thabl 14.1	Safleoedd Geo-gadwraeth sy'n Bwysig yn Rhanbarthol (RIGS)/ Safleoedd Adolygu Cadwraeth Ddaearegol (GCR) – gweithredu	Mae'r Adroddiad Cwmpasu yn nodi bod pum safle o bwysigrwydd daearegol o fewn neu'n agos i'r Coridor Cwmpasu a bod GCR Afon Efyrnwy yn sensitif i unrhyw seilwaith sy'n newid arwyneb y dirwedd. Ni ddarparwyd digon o wybodaeth ynglŷn â llwybrau effaith posibl i RIGS a GCR yn ystod gweithredu i eithrio'r posibilrwydd o LSE ar y derbynyddion hyn. Nid yw'r Arolygiaeth yn cytuno i hepgor y mater hwn. Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o'r mater hwn neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.9.3	Paragraffau 14.29 a 14.35 a Thabl 14.1	Tir halogedig gan gynnwys safleoedd tirlenwi – adeiladu a gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn o'r Datganiad Amgylcheddol ar y sail y bydd mesurau lliniaru safonol, dileu unrhyw risgiau trwy ddyluniad neu adfer (os bydd angen) yn golygu bod effeithiau arwyddocaol yn annhebygol o ddigwydd.
			Mae'r Adroddiad Cwmpasu yn datgan y gellid dod ar draws halogiad/safleoedd tirlenwi presennol o fewn y Coridor Cwmpasu, ond nid yw'r Asesiad Risg Rhagarweiniol (PRA) wedi cael ei gynnal eto. Hyd nes y gwyddys canlyniadau ac argymhellion PRA, nid oes digon o dystiolaeth i gefnogi hepgor asesiad o dir halogedig ar gyfer y cam adeiladu. Dylai'r Datganiad Amgylcheddol gael ei gefnogi gan ganfyddiadau PRA a, lle yr amlygir ffynonellau posibl halogiad a/ neu'r posibilrwydd o gysylltiadau ffynhonnell-llwybr-derbynnydd, dylai'r Datganiad Amgylcheddol asesu effeithiau arwyddocaol lle maen nhw'n debygol o ddigwydd.
			Mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn ar gyfer y cam gweithredol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.9.4	Paragraffau 14.4 a 14.5	Ardal astudio	Mae'r Adroddiad Cwmpasu yn datgan y bydd yr ardal astudio'n cynnwys llain glustogi 250m o amgylch y gosodiad seilwaith terfynol. Ni chyflwynir cyfiawnhad dros ddewis yr ardal hon. Dylai'r Datganiad Amgylcheddol esbonio ar ba sail y dewiswyd yr ardal astudio derfynol. Dylai hyn gael ei lywio gan ddealltwriaeth o ZoI rhagfynedig y Datblygiad Arfaethedig yn hytrach na phellter daearyddol generig.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.9.5	dd/b	Cynllun Dŵr Daear Swydd Amwythig	Mae Asiantaeth yr Amgylchedd wedi datgan bod llwybr drafft yr OHL yn mynd heibio'n agos i leoliad dwy orsaf bwmpio dŵr daear sy'n rhan o Gam 7 Cynllun Dŵr Daear arfaethedig Swydd Amwythig (gweler Atodiad 2 y Farn hon). Cynghorir yr Ymgeisydd i gysylltu ag Asiantaeth yr Amgylchedd i gael gwybodaeth berthnasol yn rhan o'r gwaith astudio desg a gynlluniwyd.

3.10 Priddoedd ac Amaethyddiaeth

(Pennod 15 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.10.1	Paragraff 15.31 a Thabl 15.1	Effeithiau ar dir amaethyddol – gweithredu a chynnal a chadw	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn ar y sail y byddai colledion tir amaethyddol dros dro a pharhaol (gan gynnwys y tir gorau a mwyaf amlbwrpas (BMV)) yn cael eu hasesu'n llawn yn ystod yr asesiad o'r cam adeiladu.
			Mae'r Arolygiaeth o'r farn bod rhychwant oes 80 mlynedd tybiedig y Datblygiad Arfaethedig yn cynrychioli effaith tymor hir y dylid ei hadlewyrchu yng nghasgliadau'r asesiad.
			Ar sail yr uchod, mae'r Arolygiaeth yn fodlon y gellir hepgor asesiad ar wahân o effeithiau ar dir amaethyddol yn ystod gweithredu a chynnal a chadw o asesiad pellach.
3.10.2	Paragraffau 15.31 a 15.32 a Thabl 15.1	Effeithiau ar briddoedd (gan gynnwys mawn) – gweithredu a chynnal a chadw	Mae'r Adroddiad Cwmpasu yn datgan y rhagfynegir y bydd effeithiau gweithredol ar briddoedd yn gyfyngedig ac nid yn arwyddocaol, yn amodol ar adfer tir sy'n ofynnol ar gyfer gwaith dros dro yn unol â Chynllun Rheoli Adnoddau Pridd (SRMP). Mae hefyd yn esbonio y byddai gwaith cynnal a chadw ac atgyweirio a allai arwain at darfu ar briddoedd yn ystod gweithredu yn cael ei wneud yn unol â dulliau arfer da safonol o drin pridd.
			Dylid darparu fersiynau drafft/ amlinellol o'r SRMP a'r Cynllun Rheoli Mawn (a fyddai'n cael ei ddarparu os cadarnheir y bydd effeithiau ar fawn) gyda'r cais a dylid eu sicrhau'n briodol trwy'r dDCO. Pan fydd y Datganiad Amgylcheddol yn dibynnu ar fesurau lliniaru a fyddai'n cael eu sicrhau trwy'r cynllun(iau) drafft/ amlinellol, dylid dangos (gan

Rhif Adna bod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
		groesgyfeirio'n glir) ble mae pob mesur wedi'i nodi yn y ddogfen ddrafft/ amlinellol.
		Dylai unrhyw golledion mawn parhaol gael eu hadlewyrchu yng nghasgliadau'r asesiad adeiladu.
		Yn amodol ar yr uchod ac o ystyried natur a nodweddion y Datblygiad Arfaethedig, mae'r Arolygiaeth yn cytuno bod effeithiau ar briddoedd (gan gynnwys mawn) yn ystod gweithredu a chynnal a chadw yn annhebygol o arwain at effeithiau arwyddocaol. Gellir hepgor y mater hwn o asesiad pellach.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.10.3	Paragraff 15.11	Y sefyllfa sylfaenol yn y dyfodol	Mae'r Adroddiad Cwmpasu yn datgan y gallai arferion ffermio a systemau amaethyddol newid i ymateb i'r newid yn yr hinsawdd yn y tymor hwy. Yn ogystal â chanllawiau'r Swyddfa Feteorolegol, sef Data Hinsoddegol ar gyfer Dosbarthu Tir Amaethyddol (1989), dylai'r Datganiad Amgylcheddol gael ei lywio gan Ragolygon Hinsawdd Cenedlaethol y Deyrnas Unedig (UKCP18) y Swyddfa Dywydd i sicrhau bod rhagolygon amodau hinsoddol sy'n newid yn y tymor hir yn cael eu hystyried.
3.10.4	Paragraffau 15.16 i 15.18	Arolygon maes	Mae'r Adroddiad Cwmpasu yn datgan y bydd arolygon pridd a Dosbarthiad Tir Amaethyddol (ALC) yn cael eu cynnal mewn ardaloedd lle yr aflonyddir ar briddoedd a thir amaethyddol. Mae'r Adroddiad Cwmpasu hefyd yn datgan y bydd gwaith stilio a thyllu

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			mawn yn cael ei wneud "lle y gwyddys fod mawn yn bresennol neu'n debygol o fod yn bresennol".
			Er mwyn osgoi amheuaeth, dylid cynnal arolygon mewn ardaloedd y bydd pob elfen o'r Datblygiad Arfaethedig (gan gynnwys yr is-orsaf gasglu a cheblau tanddaear rhwng yr is-orsaf gasglu) yn tarfu arnynt, yn ogystal â rhannau o lwybrau cludo a lleoliadau cyfadeiladau adeiladu lle mae priddoedd yn debygol o gael eu cywasgu.
			Dylid gwneud ymdrech i gytuno ar leoliadau a dulliau'r gwaith arolygu, gan gynnwys nifer y samplau pridd/ mawn i'w cymryd, gyda chyrff ymgynghori perthnasol.
3.10.5	Paragraffau 15.29 i 15.33	Effeithiau ar weithrediadau ffermio, busnesau fferm a mentrau amaethyddol	Lle byddai darnio'n effeithio ar hyfywedd daliadau tir amaethyddol yn ystod adeiladu a gweithredu, dylai hyn gael ei amlygu yn y Datganiad Amgylcheddol. Dylai'r Datganiad Amgylcheddol asesu effeithiau ar weithrediadau ffermio, busnesau fferm a mentrau amaethyddol yn ystod adeiladu a gweithredu, lle mae effeithiau arwyddocaol yn debygol o ddigwydd. Cyfeirir yr Ymgeisydd at sylwadau'r Arolygiaeth yn Nhabl 3.1 y Farn hon ynglŷn â'r ymagwedd arfaethedig at ystyried effeithiau economaidd-gymdeithasol.
3.10.6	Paragraff 15.29	Effeithiau ar dir amaethyddol	Dylai'r Datganiad Amgylcheddol feintioli faint o dir amaethyddol a fyddai'n cael ei golli dros dro ac yn barhaol o ganlyniad i'r Datblygiad Arfaethedig (yn ôl gradd ALC, gan gyfeirio at fap(iau) cysylltiedig sy'n dangos y graddau).

3.11 Ansawdd Aer

(Pennod 16 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.11.1	Paragraff 16.23 a Thabl 16.1	Allyriadau cerbydau – adeiladu (os na thorrir meini prawf dangosol perthnasol y Sefydliad Rheoli Ansawdd Aer (IAQM))	Os na fyddai niferoedd rhagfynedig y symudiadau traffig adeiladu a gynhyrchir gan y Datblygiad Arfaethedig ar ei ben ei hun neu ar y cyd yn torri'r meini prawf dangosol perthnasol ar gyfer asesu ansawdd aer a amlinellir yng nghanllawiau Diogelu'r Amgylchedd y DU (EPUK) ac IAQM, fel sy'n berthnasol i bob un o'r ffyrdd yr effeithir arnynt ar gyfer traffig adeiladu (pan fydd y llwybr(au) wedi'u cadarnhau), mae'r Arolygiaeth yn cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol. Pan fydd llifoedd traffig adeiladu rhagfynedig yn bodloni'r meini prawf, mae'r Adroddiad Cwmpasu yn cadarnhau y bydd y mater hwn yn cael ei gynnwys yn y Datganiad Amgylcheddol.
3.11.2	Paragraffau 16.26 a 16.27 a Thabl 16.1	Allyriadau Peiriannau Symudol Nad Ydynt ar gyfer y Ffordd (NRMM) – adeiladu a gweithredu	Prin yw'r wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu ynglŷn â defnydd tebygol o NRMM. Yn benodol, ni ddarparwyd gwybodaeth ynglŷn â math, nifer, lleoliad nac oriau gweithredu peiriannau o'r fath ac allyriadau tebygol, heblaw am gyfeiriadau byr at natur dros dro a byrhoedlog defnyddio NRMM. Ar y sail hon, nid yw'r Arolygiaeth yn gallu eithrio LSE yn ystod adeiladu ac nid yw'n cytuno y gellir hepgor y mater hwn o'r Datganiad Amgylcheddol.
			Yn unol â hynny, dylai'r Datganiad Amgylcheddol gynnwys asesiad o allyriadau NRMM yn ystod adeiladu, neu'r wybodaeth y cyfeiriwyd ati sy'n dangos cytundeb â'r cyrff ymgynghori perthnasol ac absenoldeb LSE.
			Mae'r Arolygiaeth yn fodlon y gellir hepgor y mater hwn ar gyfer y cam gweithredol.

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.11.3	Paragraff 16.27 a Thabl 16.1	Allyriadau cerbydau – gweithredu	Mae'r Adroddiad Cwmpasu yn cynnig hepgor y mater hwn gan nad yw effeithiau arwyddocaol yn debygol o ganlyniad i natur y Datblygiad Arfaethedig ac oherwydd disgwylir i deithiau cerbydol sy'n gysylltiedig â'r cam gweithredu a chynnal a chadw fod islaw'r meini prawf dangosol perthnasol ar gyfer asesu ansawdd aer a amlinellir yng nghanllawiau EPUK ac IAQM. At hynny, mae'r Adroddiad Cwmpasu yn datgan na ddisgwylir i waith cynnal a chadw ddefnyddio offer trwm na chynhyrchu allyriadau llwch sylweddol, ac felly bydd yn cael effeithiau dibwys ar ansawdd aer.
			Mae'r Arolygiaeth yn cytuno bod nifer y teithiau cerbydol a gynhyrchir yn sgil gweithredu a chynnal a chadw'r Datblygiad Arfaethedig yn annhebygol o arwain at effeithiau arwyddocaol, ac felly ystyrir ei bod yn dderbyniol hepgor y mater hwn. Dylai'r bennod Disgrifiad o'r Prosiect yn y Datganiad Amgylcheddol amlinellu nifer a math tebygol y cerbydau gweithredu a chynnal a chadw yn glir.
3.11.4	Paragraff 16.27	Allyriadau llwch – gweithredu	Mae'r Arolygiaeth yn cytuno bod gweithgareddau sy'n gysylltiedig â chynnal a chadw'r Datblygiad Arfaethedig yn weithredol yn annhebygol o arwain at allyriadau llwch sylweddol ac mae'n cytuno i hepgor y mater hwn o'r Datganiad Amgylcheddol.

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
3.11.5	Ffigur 16.1	Ardal astudio	Mae Ffigur 16.1 yn dangos ardal astudio asesu llwch adeiladu ar gyfer y Coridor Cwmpasu a'r ardal chwilio a ffefrir ar gyfer yr is-orsaf gasglu. Nid yw'n glir p'un a fyddai effeithiau llwch yn digwydd rhwng y ddwy ardal astudio ar wahân hyn. Dylai'r Datganiad Amgylcheddol

Rhif Adna bod	Cyfeirnod	Disgrifiad	Sylwadau'r Arolygiaeth
			egluro'r gwaith ac unrhyw effeithiau a fyddai'n digwydd rhwng y Coridor Cwmpasu a'r is-orsaf gasglu a darparu asesiad lle y gallai LSE ddigwydd. Dylai'r ardal astudio derfynol gael ei dangos yn glir ar ffigur yn y Datganiad Amgylcheddol.

3.12 Effeithiau Cronnol

(Pennod 17 yr Adroddiad Cwmpasu)

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
3.12.1	Paragraffau 1.38, 4.18 a 17.19	Effeithiau cronnol gyda phrosiectau Haen 2 a 3 (fel yr amlinellir yn Nodyn Cyngor Dau ar Bymtheg yr Arolygiaeth Gynllunio: 'Asesu effeithiau cronnol mewn perthynas ag NSIPau')	Mae paragraffau 1.38 a 4.18 yr Adroddiad Cwmpasu yn awgrymu na fyddai datblygiadau eraill sy'n dod o fewn Haenau 2 a 3 yn cael eu cynnwys yn yr Asesiad o Effeithiau Cronnol (CEA). Fodd bynnag, mae paragraff 17.19 yr Adroddiad Cwmpasu yn nodi cwmpas ehangach o fathau eraill o ddatblygiadau i'w cynnwys, gan awgrymu y byddai prosiectau Haen 2 a 3 yn cael eu cynnwys.
			Er mwyn osgoi amheuaeth, mae'r Arolygiaeth yn argymell bod y CEA yn dilyn y fethodoleg a amlinellir yn Nodyn Cyngor Dau ar Bymtheg, ac felly nid yw'n cytuno y gellir hepgor unrhyw ddatblygiadau eraill perthnasol yn Haenau 2 a 3 o'r CEA.
			Dylai datblygiadau eraill perthnasol o fewn Haenau 2 a 3, sy'n dod o fewn ZoI y Datblygiad Arfaethedig, gael eu hamlygu. Fel yr amlinellir yn Nodyn Cyngor Dau ar Bymtheg, dylid darparu asesiad ar gyfer pob datblygiad arall o fewn Haen 1 a Haen 2, lle y bo'n bosibl. O ran datblygiadau eraill sy'n dod o fewn Haen 3, dylai'r Ymgeisydd geisio cynnal asesiad lle y bo'n bosibl, er y gallai hwn fod yn ansoddol ac ar lefel uchel iawn. Dylid cynnal yr asesiad gydag ymdrech resymol a dylid ei gofnodi'n glir yn y Datganiad Amgylcheddol, er enghraifft gan ddefnyddio'r fformat a gyflwynir ym Matrics 2 Nodyn Cyngor Dau ar Bymtheg.
			Dylid gwneud ymdrech i gytuno ar y datblygiadau eraill penodol sydd i'w cynnwys yn y CEA gyda chyrff ymgynghori perthnasol. Yn ogystal ag awdurdodau cynllunio lleol, dylai'r rhain gynnwys Natural England, CNC, Asiantaeth yr Amgylchedd a'r Grid Cenedlaethol. Dylai'r rhestr gynnwys y prosiectau cysylltiedig, Parciau Ynni eraill Canolbarth

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			Cymru a'u cysylltiadau â'r System Trawsyrru Trydan Genedlaethol, lle y bo'n berthnasol.
			Tynnir sylw'r Ymgeisydd at yr ymatebion i'r ymgynghoriad cwmpasu (Atodiad 2 y Farn hon) sy'n amlygu datblygiadau eraill y gallai'r Datblygiad Arfaethedig effeithio arnynt, gan gynnwys y canlynol ond nid yn gyfyngedig iddynt:
			Prosiect adfer Camlas Trefaldwyn;
			Cynllun Dŵr Daear Swydd Amwythig;
			Prosiect Cysylltiadau (Trydan) Canolbarth Cymru SP; ac
			 Is-orsaf newydd i hwyluso cysylltiadau cwsmeriaid ar hyd Llinell Uwchben 400kV Legacy i Amwythig.
			Mae'r Arolygiaeth yn disgwyl i'r Datganiad Amgylcheddol ystyried y prosiectau hyn.
3.12.2	Paragraff 17.23 a Thabl 17.1	Effeithiau trawsffiniol	Mae'r Arolygiaeth wedi ystyried y Datblygiad Arfaethedig ar ran yr Ysgrifennydd Gwladol ac mae'n dod i'r casgliad fod y Datblygiad Arfaethedig yn annhebygol o gael effaith arwyddocaol ar yr amgylchedd, ar ei ben ei hun nac ar y cyd, yn unrhyw un o Wladwriaethau'r Ardal Economaidd Ewropeaidd. Wrth ddod i'r casgliad hwn, mae'r Arolygiaeth wedi amlygu ac ystyried effeithiau tebygol y Datblygiad Arfaethedig, gan gynnwys ystyried llwybrau posibl a graddau, maint, tebygolrwydd, hyd, amlder a gwrthdroadwyedd yr effeithiau.
			Mae'r Arolygiaeth o'r farn bod tebygolrwydd y Datblygiad Arfaethedig o arwain at effeithiau trawsffiniol mor isel fel nad oes angen cyhoeddi barn sgrinio trawsffiniol fanwl. Fodd bynnag, bydd y sefyllfa hon yn cael ei hadolygu'n barhaus a bydd yn ystyried unrhyw wybodaeth

Rhif Adna bod	Cyfeirnod	Materion y mae'r Ymgeisydd yn cynnig eu hepgor	Sylwadau'r Arolygiaeth
			newydd neu sylweddol wahanol sy'n dod i'r amlwg a allai newid y penderfyniad hwnnw.
			Sylwer: Mae dyletswydd yr Ysgrifennydd Gwladol o dan Reoliad 32 Rheoliadau AEA 2017 yn parhau drwy gydol proses y cais.
			Mae barn sgrinio'r Arolygiaeth ynglŷn â materion trawsffiniol wedi'i seilio ar yr ystyriaethau perthnasol a nodir yn yr Atodiad i'w Nodyn Cyngor Deuddeg, sydd ar gael ar ein gwefan yn http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

ATODIAD 1: CYRFF YMGYNGHORI YR YMGYNGHORWYD Â NHW'N FFURFIOL

TABL A1: CYRFF YMGYNGHORI RHAGNODEDIG¹

DISGRIFIAD ATODLEN 1	SEFYDLIAD
Gweinidogion Cymru	Llywodraeth Cymru
Yr Awdurdod Gweithredol Iechyd a Diogelwch	Yr Awdurdod Gweithredol Iechyd a Diogelwch
GIG Lloegr	GIG Lloegr
Y Bwrdd Gofal Integredig perthnasol	Bwrdd Gofal Integredig Swydd Amwythig, Telford a Wrekin
Natural England	Natural England
Comisiwn Adeiladau Hanesyddol a Henebion Lloegr	Historic England
Yr awdurdod tân ac achub perthnasol	Gwasanaeth Tân ac Achub Swydd Amwythig
	Gwasanaeth Tân ac Achub Canolbarth a Gorllewin Cymru
Y comisiynydd heddlu a throseddu perthnasol	Comisiynydd Heddlu a Throseddu Gorllewin Mercia
	Comisiynydd Heddlu a Throseddu Dyfed- Powys
Y cyngor/cynghorau plwyf perthnasol	Cyngor Cymuned Llansilin
neu, pan fo'r cais yn berthnasol i dir yng Nghymru neu'r Alban, y cyngor cymuned	Cyngor Cymuned Carno
perthnasol	Cyngor Cymuned Llanbrynmair
	Cyngor Cymuned Llanerfyl
	Cyngor Tref y Trallwng
	Cyngor Cymuned Banwy

Atodlen 1 Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithrefn Ragnodedig) 2009 ('y Rheoliadau APFP')

DISGRIFIAD ATODLEN 1	SEFYDLIAD
	Cyngor Tref Llanfair Caereinion
	Cyngor Cymuned Llanfihangel
	Cyngor Cymuned Llanwddyn
	Cyngor Cymuned Meifod
	Cyngor Cymuned Caersws
	Cyngor Cymuned Aberhafesb
	Cyngor Cymuned Tregynon
	Cyngor Cymuned Dwyriw
	Cyngor Cymuned Manafon
	Cyngor Cymuned Llangynyw
	Cyngor Cymuned Aberriw
	Cyngor Cymuned Castell Caereinion
	Cyngor Cymuned Cegidfa
	Cyngor Tref Llanfyllin
	Cyngor Cymuned Llanfechain
	Cyngor Cymuned Llandrinio ac Arddlîn
	Cyngor Cymuned Llansanffraid
	Cyngor Cymuned Llandysilio
	Cyngor Cymuned Llangedwyn
	Cyngor Cymuned Carreghwfa
	Cyngor Plwyf Kinnerley
	Cyngor Plwyf Gwledig Croesoswallt
	Cyngor Plwyf Hordley
	Cyngor Plwyf Whittington
	Cyngor Plwyf Llanymynech a Phant

DISGRIFIAD ATODLEN 1	SEFYDLIAD
	Cyngor Plwyf Cnwcin
	Cyngor Plwyf Gorllewin Felton
Asiantaeth yr Amgylchedd	Asiantaeth yr Amgylchedd
Y Comisiwn Cydraddoldeb a Hawliau Dynol	Y Comisiwn Cydraddoldeb a Hawliau Dynol
Comisiwn Brenhinol Henebion Cymru	Comisiwn Brenhinol Henebion Cymru
Y Corff Adnoddau Naturiol ar gyfer Cymru	Cyfoeth Naturiol Cymru
Yr Asiantaeth Cartrefi a Chymunedau	Homes England
Yr Awdurdod Hedfan Sifil	Yr Awdurdod Hedfan Sifil
Yr Awdurdod Priffyrdd Perthnasol	Awdurdod Priffyrdd Cyngor Sir Powys
	Awdurdod Priffyrdd Cyngor Swydd Amwythig
Y cwmni priffyrdd strategol perthnasol	National Highways
Y Cyngor Teithwyr	Transport Focus
Y Pwyllgor Cynghori ar Drafnidiaeth Pobl Anabl	Y Pwyllgor Cynghori ar Drafnidiaeth Pobl Anabl
Y Swyddfa Rheilffyrdd a Ffyrdd	Y Swyddfa Rheilffyrdd a Ffyrdd
Gweithredwr Cymeradwy	Network Rail Infrastructure Ltd
Yr Awdurdod Marchnadoedd Nwy a Thrydan	OFGEM
Yr Awdurdod Rheoleiddio Gwasanaethau Dŵr	Ofwat
Yr awdurdod rheoleiddio gwastraff perthnasol	Cyfoeth Naturiol Cymru
Y bwrdd draenio mewnol perthnasol	Dosbarth Draenio Mewnol Powysland (Cyfoeth Naturiol Cymru)
	Bwrdd Draenio Mewnol Melverley
Glandŵr Cymru	Glandŵr Cymru

DISGRIFIAD ATODLEN 1	SEFYDLIAD
Asiantaeth Diogelwch Iechyd y Deyrnas Unedig, un o asiantaethau gweithredol yr Adran Iechyd a Gofal Cymdeithasol	Asiantaeth Diogelwch Iechyd y Deyrnas Unedig
Y fforwm cydnerthedd lleol perthnasol	Tîm Partneriaeth Fforwm Cydnerthedd Lleol Dyfed Powys
Ymgymerwyr statudol perthnasol	Gweler Tabl A2 isod
Comisiynwyr Ystad y Goron	Ystad y Goron
Y Comisiwn Coedwigaeth	Y Comisiwn Coedwigaeth
Y Corff Adnoddau Naturiol ar gyfer Cymru	Cyfoeth Naturiol Cymru
Y bwrdd iechyd lleol perthnasol	Bwrdd Iechyd Addysgu Powys
Ymddiriedolaethau'r Gwasanaeth Iechyd Gwladol	Tîm Diogelu Iechyd Iechyd Cyhoeddus Cymru
	Ymddiriedolaeth Gwasanaethau Ambiwlans Cymru
	Ymddiriedolaeth GIG Felindre
Yr Ysgrifennydd Gwladol dros Amddiffyn	Y Weinyddiaeth Amddiffyn

TABL A2: YMGYMERWYR STATUDOL PERTHNASOL²

YMGYMERWR STATUDOL	SEFYDLIAD
Y Bwrdd Gofal Integredig perthnasol	Bwrdd Gofal Integredig Swydd Amwythig, Telford a Wrekin
GIG Lloegr	GIG Lloegr
Yr Ymddiriedolaeth GIG berthnasol	Tîm Diogelu Iechyd Iechyd Cyhoeddus Cymru
	Ymddiriedolaeth Gwasanaethau Ambiwlans Cymru

 $^{^2}$ $\,$ Mae gan y diffiniad o 'Ymgymerwr Statudol' yn y Rheoliadau APFP yr un ystyr ag yn Adran 127 Deddf Cynllunio 2008

YMGYMERWR STATUDOL	SEFYDLIAD
	Ymddiriedolaeth GIG Felindre
Ymddiriedolaeth Sefydledig berthnasol y GIG	Ymddiriedolaeth Sefydledig Prifysgol y GIG Gwasanaeth Ambiwlans Gorllewin Canolbarth Lloegr
Y bwrdd iechyd lleol perthnasol	Bwrdd Iechyd Addysgu Powys
Rheilffyrdd	Network Rail Infrastructure Ltd
	Ystad Rheilffyrdd Hanesyddol National Highways
Awdurdodau Camlesi neu Fordwyo Mewndirol	Glandŵr Cymru
Yr Awdurdod Hedfan Sifil	Yr Awdurdod Hedfan Sifil
Deiliad Trwydded (Pennod 1 Rhan 1 Deddf Trafnidiaeth 2000)	NATS En-Route Safeguarding
Darparwr Gwasanaeth Cyffredinol	Grŵp y Post Brenhinol
Yr Asiantaeth Cartrefi a Chymunedau	Homes England
Yr Asiantaeth yr Amgylchedd berthnasol	Asiantaeth yr Amgylchedd
	Cyfoeth Naturiol Cymru
Yr ymgymerwr dŵr a charthffosiaeth	Hafren Dyfrdwy Limited
perthnasol	Dŵr Cymru
	Severn Trent
Y cludwr nwy cyhoeddus perthnasol	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd

YMGYMERWR STATUDOL	SEFYDLIAD
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
Y cynhyrchwr trydan perthnasol sydd â Phwerau Gorchymyn Prynu Gorfodol CPO	Carnedd Wen Wind Farm Limited
Y dosbarthwr trydan perthnasol sydd â Phwerau CPO	National Grid Electricity Distribution (South Wales) Limited
	SP Manweb Plc
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited

YMGYMERWR STATUDOL	SEFYDLIAD
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
Y trosglwyddydd trydan perthnasol sydd â Phwerau CPO	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABL A3: AWDURDODAU LLEOL ADRAN 43 (AT DDIBENION ADRAN 42(1)(B))³

AWDURDOD LLEOL⁴		
Cyngor De Swydd Stafford		
Cyngor Bwrdeistref Newcastle under Lyme		
Cyngor Dosbarth Wyre Forest		
Cyngor Dosbarth Malvern Hills		
Cyngor Bwrdeistref Stafford		
Awdurdod Parc Cenedlaethol Eryri		
Awdurdod Parc Cenedlaethol Bannau Brycheiniog		
Cyngor Bwrdeistref Sirol Wrecsam		
Cyngor Gwynedd		

³ Adrannau 43 a 42(B) Deddf Cynllunio 2008

⁴ Fel y'i diffinnir yn Adran 43(3) Deddf Cynllunio 2008

AWDURDOD LLEOL⁴
Cyngor Sir Ceredigion
Cyngor Sir Caerfyrddin
Cyngor Swydd Henffordd
Cyngor Sir Fynwy
Cyngor Bwrdeistref Sirol Blaenau Gwent
Cyngor Bwrdeistref Sirol Caerffili
Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot
Cyngor Dwyrain Swydd Gaerlleon
Cyngor Gorllewin Swydd Gaerlleon a Chaer
Cyngor Bwrdeistref Sirol Merthyr Tudful
Cyngor Sir Powys
Cyngor Bwrdeistref Sirol Rhondda Cynon Taf
Cyngor Swydd Amwythig
Cyngor Sir Ddinbych
Cyngor Telford a Wrekin
Cyngor Sir Swydd Gaerwrangon
Cyngor Sir Swydd Stafford

TABL A4: CYRFF YMGYNGHORI NAD YDYNT YN RHAGNODEDIG

SEFYDLIAD		
Cadw		
Comisiynydd y Gymraeg		
Trafnidiaeth Canolbarth Cymru (TraCC)		

ATODIAD 2: YMATEBWYR I'R YMGYNGHORIAD A CHOPÏAU O YMATEBION

CYRFF YMGYNGHORI A YMATEBODD ERBYN Y TERFYN AMSER STATUDOL:			
Cadw			
Glandŵr Cymru			
Cyngor Sir Ddinbych			
Asiantaeth yr Amgylchedd			
Cyngor Gwynedd			
Historic England			
Cyngor Plwyf Kinnerley			
Cyngor Plwyf Cnwcin			
Cyngor Cymuned Llandysilio			
Cyngor Tref Llanfair Caereinion			
Cyngor Cymuned Llansanffraid a Deuddwr			
Cyngor Plwyf Llanymynech a Phant			
Y Weinyddiaeth Amddiffyn			
National Gas Transmission			
National Grid Electricity Transmission			
NATS Safeguarding			
Cyfoeth Naturiol Cymru			
Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot			
Network Rail			
Cyngor Sir Powys			
Severn Trent Water			
SP Energy Networks (ar ran SP Manweb)			

Barn Gwmpasu ar gyfer Prosiect Efyrnwy Frankton Green GEN

Cyngor Bwrdeistref Stafford		
Asiantaeth Diogelwch Iechyd y Deyrnas Unedig		
Cyngor Plwyf Whittington		

SCOPING OPINION:

Proposed Green GEN Vyrnwy Frankton Project

Case Reference: EN020035

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

04 March 2024



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1. INTRODUCTION

- 1.0.1 On 23 January 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Green Generation Energy Networks Cymru Ltd (Green GEN Cymru) (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Green GEN Vyrnwy Frankton Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

Scoping Report (main text and Appendices A - C):

http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000015

Scoping Report (Appendix D, Figures 1.1 - 7.10):

http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000016

Scoping Report (Appendix D, Figures 8.1 – 10.1):

http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000017

Scoping Report (Appendix D, Figures 13.1 – 16.1):

 $\frac{http://infrastructure.planninginspectorate.gov.uk/document/EN020035-000018$

- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping (AN7). AN7 and its annexes provide guidance on EIA processes during the preapplication stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:
 - https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/
- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Chapter 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Chapter 3	Project description	The Scoping Report presents a 'Scoping Report Corridor' and search areas within which elements of the Proposed Development would be located and provides a high-level description of what the Proposed Development would comprise. At this stage there are no specifically defined locations for works and there are no height parameters for main components such as the collector substation and cable sealing end compound (CSEC). The Scoping Report explains that undergrounding (rather than overhead line (OHL)) will be considered in areas most sensitive to landscape or visual impacts, or which are subject to impacts on the setting of heritage assets, but notes "At this early stage in the development of the Project it is not yet possible to identify where undergrounding could be considered appropriate".
			The above has limited the Inspectorate's ability to provide meaningful comments based on the project description at this time.
			The ES should provide a clear description of the physical characteristics of all elements of the Proposed Development, so that the likely significant effects (LSE) from their construction and operation can be ascertained. The Applicant should make effort to fix the siting of each component and reduce uncertainty; where this is not possible, the Applicant should ensure that the ES assesses a worst-case scenario adopting a parameters based approach. The description should be supported (as necessary) by figures, cross sections and drawings which should be clearly and appropriately referenced.

ID	Ref	Description	Inspectorate's comments
2.1.2	Paras 1.2, 1.3 and 1.31	Connected projects	The proposed OHL would provide a connection between the proposed Llyn Lort Energy Park in Wales and the existing National Grid 400kV electricity network in Shropshire, England. A new substation in Lower Frankton would be required, to facilitate connection of the proposed OHL into the existing network. Paragraphs 1.2 and 1.3 of the Scoping Report state that this substation would be consented separately by National Grid and does not form part of the Proposed Development. The search area for the new National Grid substation is shown on Figures 1.2 and 1.3 of the Scoping Report, with paragraph 1.29 of the Scoping Report stating it will "likely" be situated within this search area. The proposed Llyn Lort Energy Park is under development by Llyn Lort Energy Park Limited and does not form part of the Proposed Development.
			The ES should clearly describe the relationship between the Proposed Development and connected projects. This should include the extent to which the Proposed Development is dependent on their delivery and the development timelines and anticipated consenting routes of the other projects, with an explanation of how these will be coordinated. The assessment should address the potential for the connected projects to result in a LSE. The Inspectorate advises that the ES sets out clearly and in detail, how the assessment addresses impacts resulting from consequential development and activity where significant effects are likely to result. The ES should clearly explain and justify the boundaries and limitations of the assessment and, noting uncertainty may persist, any reasonable assumptions that have been applied. The assessment should address the worst case scenario (which may differ for different aspects).
2.1.3	Paras 1.30, 3.8, 3.11 to	Underground cabling	The Scoping Report states that approximately 5km of underground cabling would be required to connect the collector substation to the CSEC. It is stated that this would be routed through the proposed

ID	Ref	Description	Inspectorate's comments
	3.17 and 3.33 to 3.36		Llyn Lort Energy Park, although at this stage the likely routing has not been identified.
			Undergrounding of sections of the cables (rather than OHL) will also be considered but at this stage, any such locations have not been identified as noted above.
			The ES should describe the likely routeing, trench width and depth and cable swathe width for all proposed underground cabling, with reference to accompanying figures. The ES should identify the number of underground cables to be laid within each trench and confirm the number of trenches required. The works required to install the cables should be described, including any dewatering of excavations. Any LSE resulting from construction and operation of the underground cabling should be assessed within the ES. The Inspectorate considers that the assessment should include impacts to hydrogeological receptors (noting these are not identified in paragraph 3.11 of the Scoping Report). If open wayleaves through woodland/ vegetation are required over the underground cabling during operation, this should be explained in the ES and factored into relevant aspect assessments.
2.1.4	Paras 3.1 to 3.4	Steel towers (pylons)	The Scoping Report states that the proposed OHL would be supported on a 'L7' tower (or similar) and identifies three types of L7 tower (suspension, tension and terminal towers). The "standard height" for an L7 tower is described as 27m.
			The ES should specify the maximum number of proposed pylons and provide their dimensions. This should include maximum heights and widths of the steel work itself, along with details of the type of tower and foundations that would be required at each pylon location. The Inspectorate acknowledges that some flexibility may be required for micro-siting of pylons but would expect the proposed locations to be identified within the ES along with any limits of deviation (LoD)

ID	Ref	Description	Inspectorate's comments
			required (both laterally and vertically, i.e. in terms of the depths of foundations). All surveys and assessments should be of sufficient spatial scale to incorporate any LoD for all permanent infrastructure.
			The ES should assess the foundation design to be used, or where this is still to be determined, a worst case scenario should be adopted to identify any LSE.
2.1.5	Para 3.18	Construction compounds/ laydown areas	The ES should confirm the locations and sizes of the construction compound/ laydown areas and where possible, show detailed layouts. Any mitigation measures proposed to avoid or minimise impacts relating to the use of compounds should be described in the ES.
2.1.6	Para 3.18	Existing infrastructure	The Scoping Report identifies a number of existing infrastructure assets within or in proximity to the Proposed Development site, including railway, overhead lines and a canal. It also states that third party utility diversions or modifications may be required to facilitate construction and operation of the Proposed Development.
			The assessment in the ES should take into account the location of existing infrastructure and identify any interactions between it and the Proposed Development. Any significant effects that are likely to occur should be assessed. The Applicant's attention is drawn to the scoping consultation responses including from Network Rail, National Grid Electricity Transmission, SP Energy Networks and Canal and River Trust (Appendix 2 of this Opinion) which highlight infrastructure likely to be affected.
2.1.7	Paras 3.34 to 3.37	Temporary and permanent crossings; trenchless crossings	The locations of permanent and temporary crossings (eg for transport infrastructure, watercourses, streams and field ditches), trenchless crossings and the specific crossing methodology for each location should be identified within the ES.

ID	Ref	Description	Inspectorate's comments
			Where trenchless installation is relied upon to mitigate potential significant effects (for example, watercourse crossings), the Applicant should ensure this construction method is demonstrably secured.
			The Applicant is directed to the Canal and River Trust's scoping consultation response (Appendix 2 of this Opinion) which notes that underground crossings of the canal would need to be at least 3.5m below hard bed level of the canal. The ES should provide information on the minimum depth to be assumed for trenchless crossings.
2.1.8	n/a	Heights of structures	The ES should state whether the heights of structures are above Ordnance Datum (AOD), or above ground level. Terminology should be consistent throughout the ES and should correspond with maximum height parameters within the draft Development Consent Order (dDCO).
2.1.9	Paras 3.31 and 3.32	Road levels	Proposed finished levels of permanent access roads AOD should be identified within the ES (along with any necessary LoDs).
2.1.10	Paras 3.47, 3.48 and 12.33	Construction phase	The description of the characteristics of the construction phase should be developed in the ES to include the total duration of the construction phase, along with the anticipated construction working hours (including any weekend periods (Saturday afternoons and Sundays) and night-time working required, as indicated in paragraph 12.33) and activities on which the assessments of LSE have been based. This should be consistent with the working hours specified in the dDCO.
2.1.11	Paras 3.53 to 3.56	Operational phase	The anticipated date that the Proposed Development would become operational should be specified in the ES.
2.1.12	Chapter 12	Borrow pits	Chapter 12 of the Scoping Report (Noise and Vibration) explains that quarrying of borrow pits (including blasting) may be required as part

ID	Ref	Description	Inspectorate's comments
			of the Proposed Development. The other aspect chapters of the Scoping Report do not discuss potential impacts associated with borrow pits and potential locations for borrow pits have not been identified at this stage.
			The ES should identify the anticipated number and location of borrow pits, with reference to accompanying plan(s) and provide a description of their physical characteristics.
			The borrow pits should be included in the study areas for relevant aspect assessments and any significant effects that are likely to occur as a result of their creation and use should be assessed in the ES.
2.1.13	n/a	Management plans	The Applicant should append a draft/ outline copy of proposed management plans to the ES and demonstrate how these would be secured through the dDCO. Where the ES relies upon mitigation measures which would be secured through management plans/ strategies, it should be demonstrated (with clear cross-referencing) where each measure is set out in the draft/ outline document.
2.1.14	n/a	Employment	The ES should set out the expected number and nature of employment opportunities during each phase of the Proposed Development. The ES should consider the origins of its workforce in relevant aspect assessments. All assumptions made in this regard should be set out in the ES.
2.1.15	n/a	Vehicle movements	The ES should detail the number of anticipated vehicle movements during all phases of the Proposed Development and explain the assumptions upon which these have been established.
2.1.16	n/a	Lighting	The ES should describe the location, type and hours of use of lighting required for all phases of the Proposed Development. Impacts resulting from the introduction of lighting during construction and

ID	Ref	Description	Inspectorate's comments
			operation which are likely to result in significant effects should be assessed in the ES.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Chapter 4)

ID	Ref	Description	Inspectorate's comments
2.2.1	Para 2.14	Alternatives	The description of reasonable alternatives in the ES should include a comparison of environmental effects. It should include the specific locations considered for underground cables (rather than OHL). Explanations should be provided for the extent of the OHL and any underground sections and the locations of the collector substation and CSEC.
2.2.2	Paras 3.53 to 3.56	Impacts from maintenance including component replacement	The Scoping Report explains that OHL conductors generally require refurbishment after approximately 40 years, however the fittings and insulators may require replacing sooner (approximately 20-25 years).
			The ES should describe the scope and duration of the maintenance and replacement activities likely to be required, including predicted vehicle movements and staffing numbers. The ES should provide estimates of types and quantities of waste that are likely to be produced by the maintenance and replacement activities, as well as an assessment of any LSE associated with the generation and disposal of waste.
2.2.3	Para 4.13	Baseline	The description of the baseline conditions in the Scoping Report is generally focussed on the Scoping Corridor. The ES should describe the baseline conditions across the entirety of the application site.
2.2.4	Para 4.13	Baseline	The Scoping Report indicates that the ES may utilise data collected for the proposed Llyn Lort Energy Park (updated where relevant), as well as data collected by the Applicant specifically for the Proposed Development.

ID	Ref	Description	Inspectorate's comments
			The ES should utilise the most recently available representative datasets at the time of production. Data collected in relation to other projects and used within the ES for this Proposed Development should be clearly referenced, and the ES should include an explanation of why that data is considered applicable and (where not updated) considered to remain representative of the current state of the environment.
			The Applicant should make effort to agree the suitability of information used for the assessments in the ES with relevant consultation bodies
2.2.5	Paras 4.14 and 4.15	Future baseline	In light of the planned developments within the vicinity of the Proposed Development application site, the Applicant should clearly state which developments will be assumed to be under construction or operational as part of the future baseline.
2.2.6	Paras 4.17 and 4.19	Assessment of effects and study areas	The majority of proposed study areas for the aspect assessments have been defined in relation to the Scoping Report Corridor only. There is also minimal reference within the aspect chapters of the Scoping Report to potential impacts from the underground cabling required between the collector substation and CSEC.
			The study areas for the purposes of the ES should be defined in relation to the extent of the likely impacts from all components of the Proposed Development, including the collector substation and underground cabling between the collector substation and CSEC. The assessment of LSE should address the likely impacts from all components of the Proposed Development.
2.2.7	Para 4.17	Assessment of effects	The Scoping Report does not refer to Sulphur Hexafluoride (SF6). The ES should clarify whether infrastructure associated with the Proposed Development would utilise SF6 and provide an assessment of impacts where there is potential for LSE to occur. The Applicant should ensure

ID	Ref	Description	Inspectorate's comments
			that it complies with the requirements of National Policy Statement for Electricity Networks Infrastructure (EN-5) in this regard.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Aspects/ matters Applicant proposes not to include in the EIA

(Scoping Report Chapter 6)

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
3.1.1	Paras 6.11 to 6.14. and Table 6.1	Electric and magnetic fields (EMFs) – construction and operation	The Scoping Report proposes to scope out the effects of EMFs during operation on the basis that the Proposed Development would comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) health protection and exposure guidelines.
			On the basis that the Proposed Development will as a minimum comply with the current relevant EMF guidelines in all of its operations and that any DCO application will include a separate document which will include details and information on how the Proposed Development will comply with relevant guidelines and codes of practice, the Inspectorate agrees that this matter can be scoped out for operation. However, the Inspectorate considers that the ES should contain a summary of the separate compliance document described.
			On the basis that EMFs are associated with power distribution during operation, the Inspectorate agrees to scope out an assessment of EMFs during construction.
3.1.2	Para 6.23 and 8.13	j , ,	The Inspectorate does not consider that sufficient information has been provided to justify the scoping out of GHG emissions.
	and Table 6.1		The ES should provide an assessment of impacts from GHG emissions during construction (and operation, where relevant) where significant effects are likely to occur. The ES should clearly set out the approach to defining significance of effect and contextualising the Proposed

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
			Development emissions, with reference to relevant guidance. The calculation of GHG emissions should take account of emissions across the full project lifecycle including, where relevant, any emissions arising through land use change, and direct and indirect emissions associated with the construction phase including embodied carbon emissions from materials required.
			The Scoping Report highlights the presence of peatland within the Scoping Corridor. The GHG emissions assessment should consider the loss of peat.
			The Applicant's attention is drawn to the Inspectorate's comments in Table 2.2 above regarding SF6 in relation to the GHG assessment.
3.1.3	Para 6.24 and Table 6.1	Climate impacts relevant to adaption – construction and operation	The Scoping Report states that the Proposed Development will be designed to withstand the extremes of the UK climate (including climate change predictions). The Scoping Report proposes that climate impacts relevant to adaption will be considered within relevant environmental topic chapters in the ES, where applicable (eg the vulnerability of the Proposed Development to climate change in terms of flood risk will be considered in the Water Resources ES Chapter and in the Flood Risk Assessment (FRA)).
			The Inspectorate is content with the proposed approach and agrees that no further assessment of climate impacts relevant to adaptation is required in the ES.
3.1.4	Paras 6.26 to 6.28 and Table 6.1	Standalone ES aspect chapter for health and wellbeing	The Scoping Report proposes to scope out a standalone ES aspect chapter for health and wellbeing on the basis that impacts upon health and wellbeing would be covered within individual ES aspect chapters, namely; landscape and visual amenity, traffic and transport, noise and vibration, ground conditions, geology and hydrology, air quality.

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
			Paragraph 6.28 states that where there are intra-project effects, this would be considered in the intra-project cumulative assessment and presented within a human health section within the cumulative effects chapter.
			The Inspectorate considers that a separate ES chapter covering health and wellbeing is required to ensure that the overall impacts of the scheme are not overlooked. Consideration should be given to direct and indirect impacts to both physical and mental health of receptors, as well as the potential for particular effects on any vulnerable populations. However, the ES should avoid duplication of assessment and where relevant, the health and wellbeing aspect chapter should cross refer to information contained in other aspect chapters. The health and wellbeing chapter should take into account relevant guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance for Human Health in Environmental Impact Assessment'.
			The Scoping Report confirms that impacts on Public Rights of Way (PRoWs), which could affect access to services, will be assessed in ES Chapter 11 (Traffic and Transport). In addition to access to services, the potential for loss/ disruption to PRoW to affect people's health and wellbeing should also be considered and an assessment of any LSE provided. The Applicant's attention is drawn to Powys County Council's scoping consultation response (Appendix 2 of this Opinion) in this regard.
3.1.5	Para 6.26	Health and wellbeing - operation	The Scoping Report proposes to scope this matter out on the basis that impacts on health and wellbeing are unlikely to extend beyond the construction phase of the development and no significant effects during the operation of the Proposed Development are likely, due to

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
			the inherent lack of pathway from these impacts to human receptors during operation.
			The Inspectorate is content that given the nature of the Proposed Development, impacts on human health during operation are unlikely to result in LSE and agrees to scope this matter out.
3.1.6	Paras 6.31, 6.32 and 6.33 and Table 6.1	Major accidents and disasters ES aspect assessment	The Scoping Report proposes to scope this aspect out of the ES on the basis that through applying the flow chart set out in Figure 1 of the Major Accidents and Disasters in EIA IEMA Primer, the risks relevant to the Proposed Development can be mitigated through good working and construction practices to a level that is as low as reasonably practicable (ALARP). The Scoping Report further states that the Proposed Development would be designed to withstand the extremes of the UK climate (including climate change predictions) and therefore external impacts upon the OHL infrastructure are not considered likely to be significant.
			Noting the concerns expressed by the Ministry of Defence and Parish Councils (Appendix 2 of this Opinion), the Inspectorate does not consider that sufficient evidence has been provided at this time to justify the scoping out of an assessment of major accidents and disasters.
			The ES should assess risks of and risks from major accidents and disasters during construction and operation where significant effects are likely to occur. The Inspectorate considers that this assessment should include the potential for the Proposed Development to be vulnerable to or cause major accidents at crossings of watercourses and transport infrastructure, as well as any risks to low flying aircraft.

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
3.1.7	Paras 6.34 to 6.43 and Table 6.1	Socio-economics ES aspect assessment	The Scoping Report proposes to scope out a specific socio-economic assessment from the ES and instead, submit a 'Socio-economic Information' document accompanying the DCO application. The Scoping Report states that the ES will (by the nature of other factors that are scoped into the assessment) consider "aspects relevant to potential socio-economic impacts on people" within the following ES assessments: Traffic and Transport; Landscape and Visual; Noise; and Air Quality. The Scoping Report sets out the Applicant's view that the EIA Regulations make no clear requirement for an applicant to consider socio-economic factors.
			Whilst the Inspectorate considers the referenced aspect chapters would largely cover the potential socio-economic impacts, sufficient baseline information has not been provided to allow the scoping out of a socio-economics ES aspect assessment at this stage. The Inspectorate notes the Applicant's position on whether socio-economic factors are a requirement of the EIA Regulations. The Inspectorate draws the Applicant's attention to Section 5.13 of the Overarching National Policy Statement for Energy (EN-1) in this regard, which requires the Applicant to undertake an assessment of socio-economic impacts at local and regional levels as part of the ES.
			The ES should provide an assessment of socio-economic impacts during construction and operation where significant effects are likely to occur. Effort should be made to agree the scope of the assessment with relevant consultation bodies. As set out in Table 3.10 below (Soils and Agriculture), the assessment should include impacts on farming operations where significant effects are likely to occur. The assessment should also assess impacts on tourism where there is potential for LSE to occur, given the number of tourist destinations in proximity to the Scoping Corridor.

ID	Ref	Applicant's proposed aspects/ matters to scope out	Inspectorate's comments
			The ES should describe any mitigation or compensation agreements which are relied upon to address LSEs with evidence of agreement reached with the relevant affected parties.
			If the assessment is not presented in a standalone Socio-Economics ES chapter, the ES should provide clear cross-referencing to where the relevant impacts are considered.
3.1.8	Paras 6.44 and 6.45	Impacts from decommissioning	Chapter 6 of the Scoping Report proposes that decommissioning is scoped out of the ES - it anticipates that decommissioning would only occur when there is no longer a business case for transmission of electricity and states that decommissioning would be subject to separate consenting procedures.
			The Inspectorate notes that there is reference within some (but not all) environmental aspect chapters of the Scoping Report to impacts from decommissioning (eg Chapter 11: Traffic and Transport) but it appears that in all instances, impacts from decommissioning are proposed to be scoped out.
			The Inspectorate agrees that decommissioning can be scoped out of the ES, subject to a high-level summary of potential effects for each environmental aspect being appended to the ES. The Inspectorate expects this to include a description of the likely decommissioning methods.

3.2 Landscape and Visual Amenity

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paras 7.21, 7.22 and Table 7.2	 Impacts on the following receptors construction and operation: Eryri/ Snowdonia National Park; Bryniau Clwyd a Dyffryn Dyfrdwy/ Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)); and Shropshire Hills AONB. 	The Scoping Report states that the Scoping Corridor is over 14km from Snowdonia National Park and over 5km from the nearest AONB (now 'National Landscape') (Clwydian Range and Dee Valley; and Shropshire Hills National Landscapes). The Inspectorate agrees that impacts on Snowdonia National Park and on National Landscapes are not likely to result in significant effects and can be scoped out of further assessment. NRW has highlighted (Appendix 2 of this Opinion) that the Scoping Corridor and Provisional Landscape and Visual Impact Assessment (LVIA) Study Area overlap with the area of search for the North East Wales National Park Designation Project. The Applicant is advised to keep the timescales for future designation under review and make efforts to agree the approach to assessment with NRW. Depending on the progress of this Project at the time of any DCO application, the ES should either include an assessment assuming a worst case where the AoS has been designated as the North East Wales National Park, or assess impacts on any new National Park designation.
3.2.2	Para 7.23 and Table 7.2	Impacts on Special Landscape Areas (SLA) – construction and operation	The Scoping Report states that the nearest SLAs are over 5km from the Scoping Corridor and that due to the intervening distance, intervening topography and the scale and nature of the Proposed Development, no effects are anticipated on the special qualities of SLAs.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that impacts on SLAs are not likely to result in significant effects and can be scoped out of further assessment.
3.2.3	Para 7.46	Cumulative effects on landscape and visual receptors – construction	Paragraph 7.46 of the Scoping Report indicates that cumulative effects on landscape and visual receptors would only be considered in relation to the operational phase of the Proposed Development. Having regard to the nature and characteristics of the Proposed Development, the Inspectorate is content with this approach. Cumulative effects on landscape and visual receptors during construction of the Proposed Development can be scoped out.
3.2.4	Paras 7.7 and 7.47 and Table 7.2	 Impacts on the following receptors construction and operation: Visual receptors located beyond 3km of the Proposed Development (with the exception of any very high sensitivity receptors up to 5km); and Visual receptors located outside the Zone of Theoretical Visibility (ZTV) 	A 3km LVIA Study Area is proposed for the purposes of the ES and the Scoping Report proposes to scope out impacts on visual receptors beyond 3km (with the exception of any very high sensitivity receptors up to 5km), on the basis that effects are unlikely to be significant. Sufficient information, such as ZTV mapping, has not been provided to demonstrate that significant effects would not occur beyond 3km and as such, the Inspectorate is not in a position to scope this matter out of the ES. The ES should include an assessment of impacts on any visual receptors located beyond 3km of the Proposed Development which are likely to result in significant effects. The Inspectorate considers that the study area, ZTV and
		(ZTV).	visualisations presented in the ES should represent the extent of the likely impacts from construction and operation of the Proposed Development and all proposed structures including the collector substation. The Applicant should make effort to agree the study area and methodology for the ZTV with relevant consultation bodies including local authorities. On this basis, the Inspectorate agrees that any impacts on visual receptors located outside of the ZTV, once ground truthed by field work, are unlikely to result in significant effects. This matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.2.5	Paras 7.39 and 7.40, Table 7.1 and Figure 7.9	Viewpoints and visualisations	Table 7.1 of the Scoping Report sets out 17 preliminary representative viewpoints, the locations of which are illustrated on Figure 7.9. Whilst it is explained that "additional viewpoints" will be selected once the route has been refined, the Inspectorate considers that this is a relatively low number, given the nature and scale of the Proposed Development. There is also a lack of viewpoints to support the assessment of impacts from the collector substation and the Inspectorate advises that suitable viewpoints are selected in this regard.
			The Inspectorate also advises that suitable viewpoints are selected from locations where combined, successive or sequential effects from the Proposed Development (eg from PRoW) and cumulative effects with other developments may be experienced. The Canal and River Trust and Kinnerley Parish Council have also provided suggestions for viewpoint locations (see Appendix 2 of this Opinion).
			Effort should be made to agree the number and location of viewpoints (representative, specific and illustrative), as well as the locations for wireframes and photomontages, with relevant consultation bodies including local authorities, Historic England, Cadw, Natural England (NE) and Natural Resources Wales (NRW).
3.2.6	Paras 7.42 and 7.43	Night-time effects	Impacts on landscape and visual amenity resulting from the introduction of lighting during construction and operation which are likely to result in significant effects should be assessed in the ES. Any proposed mitigation measures should be described and secured through the dDCO. The assessment should cross refer to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage).

ID	Ref	Description	Inspectorate's comments
3.2.7	Paras 12.45 and 12.46	Impacts from mitigation measures	The Inspectorate notes that "localised screening" and "solid screening" may be required to mitigate construction and operational noise impacts. Impacts on landscape and visual amenity resulting from the introduction of noise screening which are likely to result in significant effects should be assessed in the ES.

3.3 Ecology

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Para 8.58 and Table 8.1	International and national sites designated for biodiversity - operation	The Applicant proposes to scope out impacts to international and nationally designated sites during operation, on the basis that there will be limited land take and minimal ongoing disturbance following construction.
			The Inspectorate notes that some of the national sites identified in Table 8.1 are located within the Scoping Corridor. Given the lack of perceivable impact pathways to the sites identified within Table 8.1 during operation, the Inspectorate agrees to scope this matter out of the ES. This does not preclude any assessment required under the Conservation of Habitats and Species Regulations 2017.
3.3.2	Para 3.54 and Table 8.2	Local (statutory) sites designated for biodiversity and ancient woodlands - operation	The Inspectorate notes the potential for three ancient woodland blocks to be crossed by the Proposed Development. The Inspectorate considers that impacts to local sites designated for biodiversity and ancient woodlands would primarily occur during the construction phase.
			However, it is unclear whether maintenance activities undertaken during operation would impact on these sites. The Scoping Report refers to the requirement to clear wayleaves of new growth and in the absence of a defined route for the proposed OHL, it is unclear whether these designations and habitats would be affected. This should be clarified within the ES. The Inspectorate is therefore not in a position to scope this matter out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should provide an assessment where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.3	Para 8.11 and 8.58	Direct and indirect effects arising from permanent loss and/ or fragmentation on habitats of conservation concern - operation	The Applicant proposes to scope this matter out on the basis that there would be no additional (to construction effects) habitat loss or fragmentation as a result of operation. The Scoping Report states that potential impacts would be managed through implementation of a Habitat Protection Plan.
			Please refer to the Inspectorate's comments at ID 3.3.2 regarding maintenance activities, which apply equally to this matter. The Inspectorate is therefore not in a position to scope this matter out of the ES. The ES should provide an assessment where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.4	Para 8.58	Direct and indirect effects arising from temporary loss and/ or fragmentation on habitats (not of conservation concern) - operation	The Applicant proposes to scope this matter out on the basis that the scale of temporary habitat loss will be insubstantial relative to the surrounding landscape and that micro-siting of tower locations will be employed prior to construction if required.
			Please refer to the Inspectorate's comments at ID 3.3.2 regarding maintenance activities, which apply equally to this matter. The Inspectorate is therefore not in a position to scope this matter out of the ES. The ES should provide an assessment where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.5	Para 8.58 and Table 8.2	Direct and indirect effects on non- avian protected and notable species including bat activity, hazel dormouse, otter, great crested	The Applicant proposes to scope these matters out on the basis that potential impacts will be managed through implementation of Species Protection Plans (SPP) which would include pre-works checks and, if necessary, timing restrictions and buffer distances and protected

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		newt (GCN) and vascular and non- vascular plants - operation	species licencing to ensure legal compliance. In line with the Inspectorate's comments at ID 3.3.2 regarding maintenance activities, the SPPs should address the potential for maintenance activities to affect the habitat of the listed species.
			On this basis and given the limited potential for impacts to occur during operation, the Inspectorate agrees to scope these matters out of the ES.
3.3.6	Paragraph 8.56 and Table 8.2	Invasive and non-native species (INNS) – construction and operation	The Scoping Report does not clearly set out whether an assessment of INNS will be provided for the construction and operational phases. The Inspectorate does not consider that sufficient information has been provided regarding the presence and potential spread and introduction of INNS by the Proposed Development to justify the scoping out of this matter during construction and operation.
			The Environment Agency's (EA) scoping consultation response (Appendix 2 of this Opinion) highlights multiple records of INNS within and adjacent to the Scoping Corridor. The ES should describe any necessary mitigation and/ or biosecurity precautions required to prevent the spread of INNS and explain how these would be secured and implemented through the dDCO. Effort should be made to discuss and agree the details of any necessary mitigation and/ or biosecurity precautions with relevant consultation bodies such as the EA, NRW and NE.
			The ES should provide an assessment of impacts from INNS where significant effects are likely to occur.
3.3.7	Para 8.36 and Table 8.2	Species specific surveys and assessment of invertebrates, fish, brown hare, harvest mouse,	The Inspectorate does not consider that sufficient information on the presence and likely impacts to invertebrates, brown hare, harvest mouse, hedgehog and fungi has been provided to justify the scoping out of specific surveys and assessment for these species. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		hedgehog, fungi – construction and operation	Inspectorate notes the potential for undergrounding of cables. Where there is potential for underground cables to cross watercourses, impacts on these watercourses and the fish populations they support should be assessed.
			The ES should provide surveys and assessments for these species where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE. The Applicants attention is drawn to NRW's response to consultation (Appendix 2 of this Opinion) regarding records of invertebrate fauna and the need for assessment.
3.3.8	Para 8.32	Roosting bat surveys – construction and operation	The Scoping Report proposes to scope out roosting bat surveys on the basis that there would be multiple years between ecological field surveys and commencement of the construction phase, during which roost and potential roost features in trees could have appeared or disappeared. The Scoping Report proposes to undertake an assessment of potential for woodland blocks to support bats through static detector surveys. For the final route selection, trees that will be impacted will be assessed for bat roost potential and medium/ high category trees either climbed, surveyed or avoided by micro siting. The Scoping Report further states that pre-commencement bat surveys can be conditioned, and licensing may be used if required.
			The Inspectorate agrees that this is a proportionate approach to the survey of roosting bats and agrees that roosting bat surveys can be scoped out. Proposed pre-commencement bat surveys and mitigation should be clearly described in the ES and secured through the dDCO. For the avoidance of doubt, and based on paragraph 8.32 of the Scoping Report, the Inspectorate understands that effects to roosting bats during construction are scoped into the assessment. The Applicant's attention is drawn to NRW's scoping consultation response (Appendix 2 of this Opinion) regarding effects on the Tanat and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Vyrnwy Bat Sites Special Area of Conservation (SAC), its features and bat roosts within the SAC and within the Meifod Valley which is functionally linked land to the SAC. Effort should be made to agree the extent of surveys and any necessary mitigation with relevant consultation bodies such as NRW and NE.
3.3.9	Para 8.24 and Table 8.2.	Badger – construction and operation	Table 8.2 of the Scoping Report proposes to scope out surveys and assessment of badger on the basis that where badger setts occur in the vicinity of the Proposed Development's infrastructure, modification to works will be proposed to retain badger setts. This information is contradicted by paragraph 8.24 of the Scoping Report, which proposes to scope in badger surveys based on the results of the extended Phase 1 Habitat Survey.
			In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters out of the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.10	Para 8.36 and Table 8.2	Water vole – construction and operation	The Scoping Report proposes to scope out surveys and assessment of water voles on the basis that the Proposed Development would avoid habitat areas associated with water voles, and that should this assumption change, the need for water vole surveys would be revisited.
			In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.11	Para 8.36 and Table 8.2	Reptiles – construction and operation	The Scoping Report proposes to scope out surveys and assessment of reptiles on the basis that habitat manipulation under ecological supervision would be utilised. The Scoping Report states that should this technique not be appropriate, the need for reptile surveys will be revisited.
			In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
3.3.12	Para 8.4	Study areas	The ES should clearly define and justify the study areas, based on the Zone of Influence (ZoI) from the Proposed Development. This should include consideration of potential impact pathways to identify where LSE might occur to a receptor, regardless of geographical distance from the DCO boundary. This should be supported by figures as appropriate.
3.3.13	n/a	Noise and vibration impacts on ecological receptors	It is unclear whether an assessment of impacts on ecological receptors from noise and vibration is proposed. The ES should assess noise and vibration impacts on ecological receptors where significant effects are likely to occur. Any such assessments should cross refer to findings of other relevant aspect chapters. The Applicant should also

ID	Ref	Description	Inspectorate's comments
			refer to the Inspectorate's comments in Table 3.7 (Noise and Vibration) of this Opinion in this regard.
3.3.14	n/a	Montgomery Canal	There are records for grass-wrack pondweed, a nationally scarce aquatic plant, located at Montgomery Canal, Aston Lock - Keeper's Bridge Site of Special Scientific Interest (SSSI). Where there is potential for this SSSI to be affected by the Proposed Development, a construction phase assessment of impacts to grass-wrack pondweed should be provided. The Applicant's attention is drawn to the scoping consultation responses from the EA and the Canal and River Trust in this regard (Appendix 2 of this Opinion).
3.3.15	n/a	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Ornithology

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 9.35	Electrocution – construction and operation	The Scoping Report proposes to scope out the electrocution of birds on the OHL on the basis that the design and configuration of the wires and towers of the OHL would not allow electrocution to be possible.
			The Inspectorate agrees that electrocution of birds can be scoped out of the ES on the basis that the design of the OHL would not allow electrocution to be possible. The ES should evidence that the gaps between the conductors and the perch points exceed the largest potential wingspan of perching bird species.
3.4.2	Para 9.35	Disturbance – operation	The Scoping Report proposes to scope out operational disturbance on the basis that the Proposed Development's infrastructure would require limited site activities for maintenance activities. The Scoping Report further states that noise and visual effects associated with the collector substation, wires and towers, are considered too low in magnitude to cause significant effects on bird populations.
			Whilst maintenance activities are expected to be limited and unlikely to result in significant effects on bird populations, in the absence of a defined location for the Proposed Development's operational infrastructure, and until there is certainty on the extent and presence of certain species, the Inspectorate does not consider that sufficient information has been given to scope out operational disturbance (noise and visual) impacts. Accordingly, the ES should provide an assessment of these matters where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.3	Para 9.35	Effects on non-sensitive populations – construction and operation	The Scoping Report proposes to scope out a detailed assessment of bird populations that are present but sufficiently widespread, unthreatened and resilient to the potential effects arising from the Proposed Development.
			The ES should explain how bird populations have been determined to be "sufficiently widespread, unthreatened and resilient to the potential effects", with reference to baseline data, relevant guidance and professional judgement. The Applicant should make effort to agree the list of bird populations for assessment with relevant consultation bodies. Subject to this, the Inspectorate agrees to scope this matter out from further assessment.
3.4.4	Para 9.39 and Table 9.2	International and national sites designated for birds - construction	Paragraph 9.39/ Table 9.2 of the Scoping Report proposes to scope out ornithology surveys and construction effects on international and national sites designated for birds. It is unclear what is meant by this as Table 9.2 does not refer to specific surveys. The justification provided states that the only relevant site is the Midland Meres and Mosses Ramsar site where designated ornithological features would not be disturbed by construction.
			The Inspectorate does not consider that sufficient information has been provided regarding construction impacts on international and national sites designated for birds.
			Accordingly, the ES should include an assessment of these matters where significant effects are likely to occur, supported by robust baseline data, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
			The ES should address whether any areas within the Scoping Corridor provide functionally linked land (FLL) to the Midland Meres and Mosses Ramsar site, which could be affected by the Proposed

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Development. Any FLL likely to be affected should also form part of the assessment.

ID	Ref	Description	Inspectorate's comments
3.4.5	Para 9.3	Study area	The ES should clearly define and justify the study area, based on the Zone of Influence (ZoI) from the Proposed Development and the potential effect pathways to designated sites.
3.4.6	Paras 9.3 and 9.16	Surveys for bird species	The Scoping Report states that one full year of ornithological surveys will be undertaken. The spatial extent, number of visits and duration for the suite of bird surveys proposed should be fully justified within the ES and supported by clear figures. The survey approach should be sufficient to address any areas of FLL likely to be affected by the Proposed Development. Effort should be made to agree the survey extent and scope with relevant consultation bodies including NE and NRW.
3.4.7	n/a	Noise and vibration impacts on ornithological receptors	It is unclear whether an assessment of impacts on ornithological receptors from noise and vibration is proposed. The ES should assess noise and vibration impacts on ornithological receptors where significant effects are likely to occur. Any such assessments should cross refer to findings of other relevant aspect chapters. The Applicant should also refer to the Inspectorate's comments in Table 3.7 (Noise and Vibration) of this Opinion in this regard.
3.4.8	n/a	Confidential annexes	Refer to the Inspectorate's comments in Table 3.3 above.

3.5 Historic Environment

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Para 10.45 and Table 10.1	Direct physical effects on heritage assets – operation (including maintenance)	The Scoping Report states that direct physical effects on heritage assets will only occur during construction of the Proposed Development. On the basis that maintenance or repairs on subsurface features would be restricted to areas previously disturbed and mitigated during construction and that this commitment is secured through the dDCO (or other legal mechanism), the Inspectorate considers that significant effects are unlikely to occur. Direct physical effects on heritage assets during operation (including maintenance) can be scoped out of the ES.
3.5.2	Para 10.45 and Table 10.1	Direct physical effects on heritage assets beyond the Proposed Development footprint – construction and operation	The Scoping Report states that there will be no direct physical effects on heritage assets beyond the Proposed Development footprint, as direct physical effects can only occur within the areas where construction will take place. The Inspectorate agrees that significant effects are unlikely to occur. Direct physical effects on heritage assets beyond the Proposed Development footprint can be scoped out of the ES.
3.5.3	Para 10.45 and Table 10.1	Indirect physical effects on heritage assets - construction	The Scoping Report states that given the nature of the Proposed Development and the receiving environment, indirect physical effects on heritage assets beyond the Proposed Development footprint are not predicted to occur.
			Figure 10.1 of the Scoping Report shows numerous heritage assets located in proximity to the Proposed Development. In the absence of defined locations for the works (including expected route(s) of construction traffic/ haul roads) and proposed structures, the Inspectorate does not agree that this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Indirect physical effects on heritage assets during construction (eg subsidence; vibration from piling, HGVs and any rock blasting; changes to groundwater flows and levels; movement of contaminants or pollutants) should be assessed in the ES where significant effects are likely to occur.
3.5.4	Para 10.45 and Table	Direct effects on heritage assets resulting from setting change -	The Scoping Report proposes to scope out this matter on the basis of the temporary nature of construction activities.
	10.1	construction	Figure 10.1 of the Scoping Report shows numerous heritage assets located in proximity to the Proposed Development. In the absence of defined locations for the construction compounds, the Inspectorate considers there is insufficient information to conclude that significant effects will not occur. Therefore, impacts on the setting of heritage assets from construction compounds should be scoped into the assessment where significant effects are likely to occur. The Inspectorate is content that that other direct effects on heritage assets resulting from setting change during construction are not likely to be significant and can be scoped out.
3.5.5	Para 10.45 and Table 10.1	Effects during decommissioning	See comment in Table 3.1 of this Opinion. The Inspectorate agrees that decommissioning can be scoped out of the ES, subject to a high-level summary of potential effects for each environmental aspect being appended to the ES.

ID	Ref	Description	Inspectorate's comments
3.5.6	Para 3.52	Forest felling	The Scoping Report explains that forest felling will be required as part of the Proposed Development. If vegetation to be felled contributes to

ID	Ref	Description	Inspectorate's comments
			the setting of heritage assets or to landscape character, this should be considered in the Historic Environment ES assessment.
3.5.7	Paras 10.28 and 10.29	Impacts to setting	The Scoping Report states that the ZTV/s (to be developed for the LVIA) will be used to identify heritage assets which may be susceptible to effects related to setting change.
			As set out in Section 3.2 above (Landscape and Visual Amenity), the Inspectorate considers that the study area and ZTV should represent the extent of the likely impacts from construction and operation of the Proposed Development and all proposed structures including the collector substation. The Applicant should make effort to agree the study area and methodology for the ZTV with relevant consultation bodies including local authorities.
			In addition to the ZTV/s, data from other relevant aspect assessment/s (eg Noise and Vibration) should be used to identify heritage assets which may be susceptible to effects related to setting change.
			The ES should fully justify the choice of heritage assets included in the setting assessment and their locations should be depicted on a supporting plan.
			The assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the Proposed Development. Effort should be made to agree locations for viewpoints and visualisations with relevant consultation bodies including local authorities, Cadw and Historic England. Cross-reference can be made to the Landscape and Visual Amenity ES assessment to avoid duplication.
3.5.8	Paras 10.31 to 10.33	Historic Environment Desk-Based Assessment (HEDBA)	The Scoping Report states that the results of the assessment process will be reported as a HEDBA (covering baseline conditions, identification of heritage assets and likely effects). It is proposed that

ID	Ref	Description	Inspectorate's comments
			the conclusions of the HEDBA are summarised in the ES Historic Environment Chapter.
			The ES Historic Environment Chapter should contain a summary of the assessment in the HEDBA and identify any significant effects on heritage assets. The HEDBA should be appended to the ES Historic Environment Chapter.
3.5.9	Paras 10.5 and 10.30 to 10.33	Data collection – desk based	Light Detection and Ranging (Lidar) data should be fully analysed for the application site. Cadw has advised that new Lidar datasets are available (see Appendix 2 of this Opinion).
			The Applicant should make effort to discuss and agree the need for a preliminary desk-based deposit model as part of the HEDBA with Historic England and Cadw, to inform the scope and extent of archaeological field survey required to establish the baseline in locations where geophysical survey might be challenging due to site conditions.
3.5.10	Paras 10.34 and 10.35	Data collection – field surveys	As stated in paragraph 10.34 of the Scoping Report, it is anticipated that some form of targeted geophysical survey will be required to inform the EIA. It is not confirmed at this stage whether intrusive investigations and/ or trial trenching are proposed, but the Scoping Report notes that further consultation would be undertaken with relevant consultation bodies to establish the scope of field survey that would be required.
			Where necessary any intrusive investigations and trial trenching should be completed prior to submission of the DCO application. The Applicant should make effort to discuss and agree the timing, scope and methodology for geophysical survey, any intrusive investigations and trial trenching with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.5.11	Para 10.46	Mitigation	The ES should describe the proposed mitigation measures and explain how these would be secured through the dDCO, including proposals for the recording of any archaeology which would be permanently lost as a result of the Proposed Development. Effort should be made to agree the necessary measures with relevant consultation bodies.

3.6 Traffic and Transport

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Para 11.23 and Table 11.1	Traffic and transport effects – operation	The Scoping Report proposes to scope out traffic and transport effects related to operation, on the basis that any operational traffic would be limited to routine maintenance and inspection activities. The Inspectorate agrees that the number of vehicle trips generated by the operation of the Proposed Development are unlikely to result in significant effects and is content to scope this matter out. The Project Description chapter of the ES should clearly set out the likely number and type of operation and maintenance vehicles.
3.6.2	Para 11.23	Traffic and transport effects – decommissioning	See comment in Table 3.1 of this Opinion. The Inspectorate agrees that decommissioning can be scoped out of the ES, subject to a high-level summary of potential effects for each environmental aspect being appended to the ES.

ID	Ref	Description	Inspectorate's comments
3.6.3	Para 3.25	Abnormal loads	Should the position change and any abnormal loads be required during construction of the Proposed Development, their associated effects should be assessed in the ES. The assessment should consider impacts on bridges, culverts and Strategic Road Network junctions, as well as potential cumulative effects on the road network with other committed developments.
3.6.4	Paras 11.2, 11.3 and	Study area and data collection	The ES should confirm the final study area for the assessment and justify how this has been selected, with reference to relevant industry guidance, the extent of the likely impacts and locations of sensitive

ID	Ref	Description	Inspectorate's comments
	11.11 to 11.13		receptors. A plan illustrating the extent of the study area and the expected route(s) of construction traffic should be included in the ES.
			The Scoping Report does not anticipate that any field surveys will be needed, on the basis that there is a high level of existing publicly available data. To provide assurance that the assessment of LSE is supported by a robust dataset, the ES should include a justification to support the extent of the data collection, including how the data collected relates to the expected route(s) of construction traffic. Effort should be made to agree the study area and need for any field surveys with relevant consultation bodies.
3.6.5	Paras 11.11 to 11.13	Impacts on users of PRoW	The assessment of impacts on users of PRoW should be supported by pedestrian/ user counts where possible, with effort made to agree the locations for such counts with relevant consultation bodies. Where relevant, the ES should assess potential interactions between aspect assessments (for example traffic and transport, noise, dust, recreation and visual impact). The locations of any diversions or closures should be illustrated on suitable figures in the ES.
3.6.6	Paras 11.18, 12.27 and 12.28	Mitigation	Where the ES relies upon mitigation measures which would be secured through the outline Construction Traffic Management Plan, it should be demonstrated (with clear cross-referencing) where each measure is set out in the outline document.
3.6.7	n/a	Impacts from transportation of waste	Any LSE resulting from the transport of waste generated during construction of the Proposed Development should be assessed in the ES. Any assumptions made (such as with regard to quantities of contaminated land) should be clearly set out and justified in the ES.

3.7 Noise and Vibration

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 12.15	Impacts from noise and vibration on commercial and industrial receptors – construction and operation	The Scoping Report proposes to scope out commercial and industrial receptors, stating that these receptor types are of lower sensitivity to noise and vibration and are not referenced as noise-sensitive in NPS EN-1 or Technical Advice Note (TAN) 11: Noise.
			At this stage, it is not confirmed whether there are any commercial and industrial receptors within the noise and vibration study areas set out in paragraphs 12.2 to 12.5 of the Scoping Report and there is an absence of defined locations for the works and proposed structures. The Inspectorate considers there is insufficient information at present to scope this matter out from further assessment.
			Accordingly, the ES should include an assessment of impacts from noise and vibration on commercial and industrial receptors, or information to demonstrate agreement with the relevant consultation bodies and the absence of a LSE.
3.7.2	Para 12.19	Noise or vibration baseline surveys for ecological sites	Paragraph 12.19 of the Scoping Report states that no noise or vibration baseline surveys are proposed for any ecological sites and identifies this matter as scoped out. No supporting justification is provided.
			In the absence of defined locations for the works (including expected route(s) of construction traffic/ haul roads) and proposed structures, the Inspectorate is not in a position to scope this matter out.
			Accordingly, the ES should include an assessment of impacts from noise and vibration on ecological receptors, or information to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			demonstrate agreement with the relevant consultation bodies and the absence of a LSE.
3.7.3	Paras 12.35 and 12.38 and Table 12.1	Vibration from traffic - construction	The Inspectorate notes some inconsistency between paragraphs 12.35, 12.38 and Table 12.1 of the Scoping Report, meaning it is unclear whether the Applicant proposes to scope in or out the effects of vibration from construction traffic.
			The Scoping Report indicates that occasional momentary noise and vibration can arise when heavy vehicles pass dwellings at very short separation distances. The Inspectorate considers that in the absence of details of the expected route(s) of construction traffic and the anticipated number of vehicle movements during the construction phase, there is insufficient information at present to scope this matter out from further assessment.
			Accordingly, the ES should include an assessment of impacts from vibration from construction traffic, or information to demonstrate agreement with the relevant consultation bodies and the absence of a LSE.
3.7.4	Paras 12.39 to 12.41 and Table 12.1	 Noise from OHLs and underground cables – operation and maintenance; and Noise from all sources – 	The Scoping Report states that the operation of underground cables would not produce any noise and that the predicted levels of noise from 132kV OHLs during worst-case conditions are very low (less than 20 dB(A)).
	maintenance		The ES should explain how the design of the proposed OHL would ensure that exceedance of the predicted levels of noise would not occur and how this would be secured. Subject to this, the Inspectorate agrees that operation of the OHL (including CSEC) and underground cables is unlikely to generate noise to a scale that would result in significant effects and agrees that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			In terms of maintenance, the Scoping Report states that noise from maintenance activities would be for very limited periods and unlikely to result in any significant effects. The Inspectorate agrees that noise from short term maintenance activities can be scoped out of the ES. However, the ES should consider the potential that more substantial activity is required as part of maintenance, eg replacement of components of the Proposed Development, which would be more akin to the impacts described during the construction stage. The ES should include an assessment of any LSE.
3.7.5	Para 12.42 and Table 12.1	Noise and vibration from traffic - operation and maintenance	The Inspectorate agrees that noise and vibration from traffic generated by operation and maintenance of the Proposed Development is unlikely to result in significant effects. This matter can be scoped out.
3.7.6	Para 12.43 and Table 12.1	Vibration - operation and maintenance	The Scoping Report proposes to scope out this matter on the basis that none of the infrastructure which forms part of the Proposed Development during operation is likely to generate anything other than negligible levels of vibration.
			The Scoping Report does not include any information to describe the vibration characteristics of the proposed collector substation during operation. In the absence of this information and without a defined location for this component (and therefore, confirmation of the distance to sensitive receptors), the Inspectorate is not in a position to scope this matter out. Accordingly, the ES should include an assessment of impacts from operational vibration from the collector substation, or information to demonstrate agreement with the relevant consultation bodies and the absence of a LSE.
			The Inspectorate is content that any vibration generated by maintenance of the collector substation, or by operation and

II	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			maintenance of the other Proposed Development components, is not likely to result in significant effects and can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.7.7	Paras 12.3 to 12.5 and 12.15	Study areas and sensitive receptors	The ES should confirm the final study areas for the assessment and justify how these have been selected, with reference to relevant industry guidance, the extent of the likely impacts and locations of sensitive receptors.
			Paragraph 12.15 of the Scoping Report states that the sensitive receptors will comprise residential dwellings, as well as schools and healthcare facilities (if relevant). As per the Inspectorate's comments above, commercial and industrial receptors should also be considered as receptors, as relevant.
			Reference is not made to other receptor types that may be sensitive to noise and vibration impacts, such as recreational, heritage or ecological receptors. The ES should assess noise and vibration impacts on recreational, heritage and ecological receptors (as referenced in ID 3.7.2 above) where significant effects are likely to occur. Any such assessments should cross refer to findings of other relevant aspect chapters.
			Effort should be made to agree the study areas and sensitive receptors with relevant consultation bodies.
			The ES should include appropriate figures to illustrate the study areas and locations of sensitive receptors.
3.7.8	Paras 12.20 to 12.23	Assessment method	Whilst the Inspectorate acknowledges that the methodology is proposed to follow relevant British Standards and guidance as listed in Scoping Report paragraphs 12.20 to 12.23, the Scoping Report

ID	Ref	Description	Inspectorate's comments
			does not explain how these methodologies will be applied and how significant effects will be determined. This should be addressed in the ES.

3.8 Water Resources

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paras 13.31 and 13.32 and Table 13.1	Effects on water quality including drainage - construction	The Scoping Report proposes to scope out effects on water quality during construction, stating that standard mitigation measures within the outline CEMP and a construction phase Surface Water Management Plan (SWMP) would remove the pathway between the source and receptors for most of the working environment. The Scoping Report also states that trenchless techniques will be used to reduce the potential risk for watercourse crossings during construction.
			The Inspectorate notes that details of the working methods for the watercourse crossings by underground cable and/or ground based infrastructure and their exact locations have yet to be determined. Therefore, there is insufficient information in the Scoping Report to determine the scale and the length of time that crossings or access tracks across watercourses would be in place.
			The Inspectorate does not consider that there is sufficient information available at this stage to scope out effects on water quality during construction. Accordingly the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
			The ES should include details of how any water is to be captured, treated and disposed during construction in terms of dewatering, excavations and trenches, especially in proximity to the watercourse crossings.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.2	Paras 13.33 to 13.35 and Table 13.1	Effects on water quality including drainage - operation	The Scoping Report states that the design of the collector substation and CSEC will include a formal drainage strategy. The Scoping Report further states that there will be no operational discharges and all maintenance activities will be undertaken in accordance with best practice and manufacturers requirements. Therefore, no LSE on water quality are anticipated during the operational phase.
			The Inspectorate agrees that, provided the measures to mitigate the risks of pollution of watercourses are clearly described in the ES and secured in the dDCO, significant effects are not likely to occur and this matter can be scoped out of further assessment. A draft/ outline version of the formal drainage strategy for the collector substation and CSEC should be included with the DCO application.
3.8.3	Paras 13.36 to 13.38 and Table 13.1	Effects on hydrology (including main rivers, ordinary watercourses and private water supplies (PWS)) - construction and operation	The Scoping Report proposes to scope out effects on hydrology during construction and operation, on the basis that no LSE are anticipated on existing water interests including PWS, due to the nature of the Proposed Development. The Scoping Report states that the potential for physical disturbance to watercourses would be temporary and short-term in duration.
			The Inspectorate notes that details and exact locations of the construction works near PWS, within watercourses and the construction of access tracks across watercourses have yet to be determined. There is insufficient information in the Scoping Report to determine the scale and the length of time that they would be in place. The Scoping Report does not describe what measures would be proposed for reinstatement of any affected watercourses following construction and therefore any on-going implications from construction activity during operation.
			The Inspectorate does not consider that there is sufficient information available at this stage to scope this matter out. Accordingly the ES

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.8.4	Paras 13.41 and 13.42 and Table 13.1	Flood risk (groundwater, sewers and artificial sources) - construction and operation	The Scoping Report states that the potential flood risks from sources including groundwater, sewers and artificial sources eg reservoirs will be assessed within the Flood Risk Assessment (FRA) and it is considered unlikely, based on the nature of the Proposed Development that, that these flood sources would pose a potential risk.
			However, limited information is presented about the potential for flood risk from these sources. The Inspectorate considers that there is insufficient information at this stage to conclude that significant effects relating to flood risk from these sources during construction and operation are not likely. The Applicant's attention is also drawn to the comments from Canal and River Trust (Appendix 2 of this Opinion).
			The ES should provide an assessment of flood risks where significant effects are likely to occur, or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.8.5	Para 13.42 and Table 13.1	Flood risk (fluvial and pluvial) - operation	The Scoping Report states that during operation of the Proposed Development the majority of land required for the construction phase will be restored; the collector substation and CSEC will be sited outside of Flood Zones 2 and 3 while the towers are considered to be water compatible (subject to mitigation to be identified in the FRA). Therefore, it states that potential impacts on rivers and their floodplains are likely to be limited.
			The Inspectorate agrees that operational impacts in respect of fluvial and pluvial flood risk are not likely to give rise to significant effects

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and can be scoped out. The ES should include appropriate figures to demonstrate that the collector substation and CSEC are sited outside of Flood Zones 2 and 3. Should the collector substation and/ or CSEC be located within Flood Zone 2 and/ or 3, an operational phase assessment should be provided.

ID	Ref	Description	Inspectorate's comments
3.8.6	Para 13.3 and Table 13.1	Potential effects on hydrogeology including PWS, Groundwater Dependant Terrestrial Ecosystems (GWDTE) and groundwater abstractions	The Inspectorate notes that hydrogeology including PWS and GWDTEs will be covered in ES Chapter 14: Ground Conditions, Geology and Hydrogeology. The Inspectorate is content with this approach. The assessment in ES Chapter 14 should contain appropriate cross reference to relevant aspect chapters of the ES including Water Resources and Ecology.
3.8.7	Paras 13.4 and 13.5	Study area	The ES should provide justification for the use of a 250m buffer around the final infrastructure layout as the study area for the water resources assessment and describe any waterbodies located outside of the established study area that have also been included in the assessment, stating the distance from the Proposed Development, and explaining why the waterbody has been included. This should be supported by appropriate figures in the ES.
3.8.8	Para 13.13	Future baseline	The Applicant is directed to the Environment Agency's scoping consultation response (Appendix 2 of this Opinion) which provides advice on the source of model data and consideration of relevant guidance.
3.8.9	Para 13.21	Assessment of LSE	Where professional judgement is used to determine whether an identified effect is significant or not significant in the ES, this decision

ID	Ref	Description	Inspectorate's comments
			should be supported by clear reasons and evidence and make reference to any relevant guidance.
3.8.10	Para 13.26	Water Framework Directive (WFD) Screening Assessment	Scoping Report paragraph 13.26 states that a WFD screening assessment will be undertaken for each hydraulic catchment through which the Scoping Corridor passes. The Applicant's attention is drawn to the Inspectorate's Advice Note Eighteen: The WFD in this regard.
			The ES should explain the relationship between the Proposed Development and any relevant water bodies in relation to the current relevant River Basin Management Plan.
3.8.11	n/a	Impacts from the use of drilling muds	If directional drilling works are required, impacts on aquatic environment receptors and water resource receptors from the use of drilling muds should be assessed where significant effects are likely to occur.

3.9 Ground Conditions, Geology, and Hydrogeology

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paras 14.27 14.32 and Table 14.1	Land instability and mining - construction and operation	The Scoping Report proposes to scope out this matter on the basis that the Proposed Development is outside of Coal Mining Development High Risk Areas and ground stability would be considered within the engineering design of the Proposed Development, with standard/embedded mitigation to be provided where necessary. The Inspectorate notes from paragraph 14.12 of the Scoping Report that this will include consideration of changes to the future baseline, particularly how climate change could affect the integrity of soil and peat deposits.
			The Inspectorate is content that this matter can be scoped out on this basis. The ES should however identify any standard/ embedded mitigation measures relied upon to exclude LSE and explain how they would be secured and implemented as part of the dDCO.
3.9.2	Paras 14.28 and 14.33 and Table 14.1	Regionally Important Geo- conservation Sites (RIGS)/ Geological Conservation Review (GCR) sites - operation	The Scoping Report indicates that there are five sites of geological importance within or in close proximity to the Scoping Corridor and the Afon Vyrnwy GCR is sensitive to any infrastructure that alters the landscape surface.
			Insufficient information regarding potential impact pathways to RIGS and GCR during operation has been provided to exclude the possibility of LSEs to these receptors. The Inspectorate does not agree to scope this matter out. Accordingly the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.3	Paras 14.29 and 14.35 and Table 14.1	Contaminated land including landfills - construction and operation	The Scoping Report proposes to scope this matter out of the ES on the basis that standard mitigation, designing out of any risk or remediation (if required) will mean significant effects are unlikely to occur.
			The Scoping Report states that there is the potential for existing contamination/ landfills to be encountered within the Scoping Corridor, however the Preliminary Risk Assessment (PRA) has not yet been undertaken. Until the results and recommendations of a PRA are known, there is insufficient evidence to support scoping out an assessment of contaminated land for the construction phase. The ES should be supported by the findings of a PRA and where potential sources of contamination and/ or potential source-pathway-receptor linkages are identified in relation to the construction phase, the ES should assess significant effects where they are likely to occur. The Inspectorate is content that this matter can be scoped out for the operational phase.

ID	Ref	Description	Inspectorate's comments
3.9.4	Paras 14.4 and 14.5	Study area	The Scoping Report states that the study area will comprise a 250m buffer around the final infrastructure layout. No justification is presented for the selection of this area. The ES should explain the basis on which the final study area has been selected. This should be informed by an understanding of the predicted ZoI of the Proposed Development rather than a generic geographical distance.
3.9.5	n/a	Shropshire Groundwater Scheme	The Environment Agency has stated that the draft OHL route passes close to two groundwater pumping station locations of the proposed Phase 7 Shropshire Groundwater Scheme (see Appendix 2 of this

ID	Ref	Description	Inspectorate's comments
			Opinion). The Applicant is advised to contact the Environment Agency to obtain relevant information as part of the planned desk study work.

3.10 Soils and Agriculture

(Scoping Report Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 15.31 and Table 15.1	Effects on agricultural land – operation and maintenance	The Scoping Report proposes to scope this matter out on the basis that temporary and permanent losses of agricultural land (including BMV land) would be fully assessed during the construction stage assessment.
			The Inspectorate considers that the assumed 80-year lifespan of the Proposed Development represents a long-term impact which should be reflected in the assessment conclusions.
			On the basis of the above, the Inspectorate is content that a separate assessment of effects upon agricultural land during operation and maintenance can be scoped out of further assessment.
3.10.2	Paras 15.31 and 15.32 and Table 15.1	Effects on soils (including peat) – operation and maintenance	The Scoping Report states that operational effects on soils are predicted to be limited and not significant, subject to re-instatement of land required for temporary works according to a Soil Resources Management Plan (SRMP). It also explains that maintenance and repair works which may result in disturbance of soils during operation would be undertaken in accordance with standard good practice soil handling methods.
			Draft/ outline versions of the SRMP and Peat Management Plan (which would be produced if it is confirmed there will be impacts to peat) should be provided with the application and appropriately secured through the dDCO. Where the ES relies upon mitigation measures which would be secured through the draft/ outline plan(s), it should be demonstrated (with clear cross-referencing) where each measure is set out in the draft/ outline document.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Any permanent losses of peat should be reflected in the construction assessment conclusions.
			Subject to the above and having regard to the nature and characteristics of the Proposed Development, the Inspectorate agrees that impacts on soils (including peat) during operation and maintenance are unlikely to result in significant effects. This matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.10.3	Para 15.11	Future baseline	The Scoping Report states that farming practices and agricultural systems may change in response to climate change over the longer term. In addition to the Meteorological Office guidance Climatological Data for Agricultural Land Classification (1989), the ES should be informed by the Met Office UK National Climate Projections (UKCP18) to ensure that forecasts of long-term changing climatic conditions are taken into account.
3.10.4	Paras 15.16 to 15.18	Field surveys	The Scoping Report states that soil and Agricultural Land Classification (ALC) surveys will be undertaken in areas where soils and agricultural land will be disturbed. The Scoping Report also states that peat probing and augering will be undertaken "where peat is known or likely to be present".
			For the avoidance of doubt, surveys should be undertaken in areas of disturbance from all components of the Proposed Development (including the collector substation and underground cabling between the collector substation), as well as sections of haul routes and construction compound locations where soils are likely to be compacted.

ID	Ref	Description	Inspectorate's comments
			Effort should be made to agree the locations and method of the survey effort, including numbers of soil/ peat samples to be taken with relevant consultation bodies.
3.10.5	Paras 15.29 to 15.33	Impacts on farming operations, farm businesses and agricultural enterprises	Where fragmentation would affect the viability of agricultural land holdings during construction and operation, this should be identified in the ES. The ES should assess impacts on farming operations, farm businesses and agricultural enterprises during construction and operation, where significant effects are likely to occur. The Applicant is referred to the Inspectorate's comments in Table 3.1 of this Opinion regarding the proposed approach to considering socioeconomic impacts.
3.10.6	Para 15.29	Impacts on agricultural land	The ES should quantify the amount of agricultural land that would be temporarily and permanently lost as a result of the Proposed Development (by ALC grade, with reference to accompanying map/s depicting the grades).

3.11 Air Quality

(Scoping Report Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Para 16.23 and Table 16.1	Vehicle emissions - construction (if relevant Institute of Air Quality Management (IAQM) indicative criteria are not exceeded)	If the predicted numbers of construction traffic movements generated by the Proposed Development alone or cumulatively would demonstrably not exceed the relevant indicative criteria for air quality assessment set out in the Environmental Protection UK (EPUK) and IAQM guidance, as relevant to each of the affected roads used for construction traffic (once the route(s) has been confirmed), the Inspectorate agrees that this matter can be scoped out of the ES. Where predicted construction traffic flows meet the criteria, the Scoping Report confirms that this matter will be scoped into the ES.
3.11.2	Paras 16.26 and 16.27 and Table 16.1	Non-Road Mobile Machinery (NRMM) emissions – construction and operation	Limited information has been provided in the Scoping Report regarding the likely use of NRMM. Specifically, no information has been provided as to the type, number, location or operational hours of such machinery and likely emissions, other than brief references to the temporary and transient nature of NRMM use. On this basis the Inspectorate is unable to exclude a LSE during construction and does not agree that this matter can be scoped out of the ES.
			Accordingly the ES should include an assessment of NRMM emissions during construction, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
			The Inspectorate is content that this matter can be scoped out for the operational phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.3	Para 16.27 and Table 16.1	Vehicle emissions - operation	The Scoping Report proposes to scope this matter out on the basis that significant effects are not likely due to the nature of the Proposed Development and vehicle trips associated with the operation and maintenance phase being anticipated to be below the relevant indicative criteria for air quality assessment set out in the EPUK and IAQM guidance. Further to this, the Scoping Report states that maintenance works are not anticipated to require heavy equipment or generate significant dust emissions and will therefore have insignificant effects upon air quality.
			The Inspectorate agrees that the number of vehicle trips generated by the operation and maintenance of the Proposed Development are unlikely to result in significant effects, it is therefore considered acceptable to scope this matter out. The Project Description chapter of the ES should clearly set out the likely number and type of operation and maintenance vehicles.
3.11.4	Para 16.27	Dust emissions - operation	The Inspectorate agrees that activities associated with the operational maintenance of the Proposed Development are unlikely to result in significant dust emissions and agrees to scope to matter out of the ES.

ID	Ref	Description	Inspectorate's comments
3.11.5	Figure 16.1	Study area	Figure 16.1 displays a construction dust assessment study area for the Scoping Corridor and the preferred collection substation search area. It is unclear whether dust impacts would occur between these two separate study areas. The ES should clarify the works and any impacts that would occur between the Scoping Corridor and collector substation and provide an assessment where there is potential for

ID	Ref	Description	Inspectorate's comments
			LSE to occur. The final study area should be clearly depicted on a figure within the ES.

3.12 Cumulative Effects

(Scoping Report Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1 Paras 1.38, 4.18 and 17.19	Cumulative effects with Tier 2 and 3 projects (as set out in the Inspectorate's Advice Note Seventeen: 'Cumulative effects assessment relevant to NSIPs')	Paragraphs 1.38 and 4.18 of the Scoping Report suggest that other developments falling into Tiers 2 and 3 would not be included in the Cumulative Effects Assessment (CEA). However, paragraph 17.19 of the Scoping Report sets out a wider scope of other development types for inclusion, suggesting that Tier 2 and 3 projects would be included.	
			For the avoidance of doubt, the Inspectorate recommends that the CEA follows the methodology set out in Advice Note Seventeen and therefore does not agree that any relevant other developments in Tiers 2 and 3 can be scoped out of the CEA.
			Relevant other developments within Tiers 2 and 3, which fall within the Proposed Development's ZoI, should be identified. As set out in Advice Note Seventeen, an assessment should be provided for all Tier 1 and Tier 2 other developments, where possible. For other developments falling into Tier 3, the Applicant should aim to undertake an assessment where possible, although this may be qualitative and at a very high level. The assessment should be carried out with reasonable effort and should be clearly documented in the ES for example using the format presented in Matrix 2 of Advice Note Seventeen.
			Effort should be made to agree the specific other developments for inclusion in the CEA with relevant consultation bodies. In addition to local planning authorities, this should include Natural England, NRW, the Environment Agency and National Grid. The list should include the connected projects, other Mid Wales Energy Parks and their

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			connections to the National Electricity Transmission System, where relevant.
			The Applicant's attention is drawn to the scoping consultation responses (Appendix 2 of this Opinion) which identify other developments which may be affected by the Proposed Development, including but not limited to:
			The Montgomery Canal restoration project;
			Shropshire Groundwater Scheme;
			SP Mid Wales (Electricity) Connections Project; and
			 New substation to facilitate customer connections along the Legacy to Shrewsbury 400kV Overhead Line.
			The Inspectorate expects the ES to consider these projects.
3.12.2 a	Para 17.23 and Table 17.1	Transboundary effects	The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.
			The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.
			The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at
			http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES¹

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Welsh Ministers	Welsh Government
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The relevant Integrated Care Board	Shropshire, Telford and Wrekin Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Shropshire Fire and Rescue Service
	Mid and West Wales Fire and Rescue Service
The relevant police and crime commissioner	West Mercia Police and Crime Commissioner
	Dyfed-Powys Police and Crime Commissioner
The relevant parish council(s) or, where	Llansilin Community Council
the application relates to land [in] Wales or Scotland, the relevant community	Carno Community Council
council	Llanbrynmair Community Council
	Llanerfyl Community Council
	Welshpool Town Council
	Banwy Community Council
	Llanfair Caereinion Town Council

Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Llanfihangel Community Council
	Llanwddyn Community Council
	Meifod Community Council
	Caersws Community Council
	Aberhafesb Community Council
	Tregynon Community Council
	Dwyriw Community Council
	Manafon Community Council
	Llangyniew Community Council
	Berriew Community Council
	Castle Caereinion Community Council
	Guilsfield Community Council
	Llanfyllin Town Council
	Llanfechain Community Council
	Llandrinio and Arddleen Community Council
	Llansantffraid Community Council
	Llandysilio Community Council
	Llangedwyn Community Council
	Carreghofa Community Council
	Kinnerley Parish Council
	Oswestry Rural Parish Council
	Hordley Parish Council
	Whittington Parish Council
	Llanymynech and Pant Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Knockin Parish Council
	West Felton Parish Council
The Environment Agency	The Environment Agency
The Equality and Human Rights Commission	Equality and Human Rights Commission
Royal Commission On Ancient and Historical Monuments Of Wales	Royal Commission On Ancient and Historical Monuments Of Wales
The Natural Resources Body for Wales	Natural Resources Wales
The Homes and Communities Agency	Homes England
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Powys County Council Highways Authority
	Shropshire Council Highways Authority
The relevant strategic highways company	National Highways
The Passengers Council	Transport Focus
The Disabled Persons Transport Advisory Committee	Disabled Persons Transport Advisory Committee
Office of Rail and Road	Office of Rail and Road
Approved Operator	Network Rail Infrastructure Ltd
The Gas and Electricity Markets Authority	OFGEM
The Water Services Regulation Authority	Ofwat
The relevant waste regulation authority	Natural Resources Wales
The relevant internal drainage board	Powysland Internal Drainage District (Natural Resources Wales)
	Melverley Internal Drainage Board
The Canal and River Trust	The Canal and River Trust

SCHEDULE 1 DESCRIPTION	ORGANISATION
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The relevant local resilience forum	Dyfed Powys Local Resilience Forum Partnership Team
Relevant statutory undertakers	See Table A2 below
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission
The Natural Resources Body for Wales	Natural Resources Wales
The relevant local health board	Powys Teaching Health Board
The National Health Service Trusts	Health Protection Team Public Health Wales
	Welsh Ambulance Services Trust
	Velindre NHS Trust
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS²

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	Shropshire, Telford and Wrekin Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	Health Protection Team Public Health Wales
	Welsh Ambulance Services Trust
	Velindre NHS Trust

 $^{^{2}\,}$ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Foundation Trust	West Midlands Ambulance Service University NHS Foundation Trust
The relevant local health board	Powys Teaching Health Board
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
	Natural Resources Wales
The relevant water and sewage	Hafren Dyfrdwy Limited
undertaker	Dwr Cymru (Welsh Water)
	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd

STATUTORY UNDERTAKER	ORGANISATION
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
The relevant electricity generator with CPO Powers	Carnedd Wen Wind Farm Limited
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (South Wales) Limited
	SP Manweb Plc
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))³

LOCAL AUTHORITY ⁴
South Staffordshire Council
Newcastle under Lyme Borough Council
Wyre Forest District Council
Malvern Hills District Council
Stafford Borough Council
Snowdonia National Park Authority
Bannau Brycheiniog National Park Authority
Wrexham County Borough Council
Gwynedd Council
Ceredigion County Council
Carmarthenshire County Council

³ Sections 43 and 42(B) of the PA2008

⁴ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY ⁴
Herefordshire Council
Monmouthshire County Council
Blaenau Gwent County Borough Council
Caerphilly County Borough Council
Neath Port Talbot County Borough Council
Cheshire East Council
Cheshire West and Chester Council
Merthyr Tydfil County Borough Council
Powys County Council
Rhondda Cynon Taf County Borough Council
Shropshire Council
Denbighshire County Council
Telford and Wrekin Council
Worcestershire County Council
Staffordshire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cadw
Welsh Language Commissioner
Trafnidiaeth Canolbarth Cymru (TraCC)

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Canal and River Trust
Canal and River Trust
Denbighshire County Council
Environment Agency
Gwynedd Council
Historic England
Kinnerley Parish Council
Knockin Parish Council
Llandysilio Community Council
Llanfair Caereinion Town Council
Llansantffraid and Deytheur Community Council
Llanymynech and Pant Parish Council
Ministry of Defence
National Gas Transmission
National Grid Electricity Transmission
NATS Safeguarding
Natural Resources Wales
Neath Port Talbot County Borough Council
Network Rail
Powys County Council
Severn Trent Water
SP Energy Networks (on behalf of SP Manweb)

Scoping Opinion for Green GEN Vyrnwy Frankton Project

Stafford Borough Council
UK Health Security Agency
Whittington Parish Council



Llywodraeth Cymru Ty'r Afon Heol Bedwas Caerffili CF83 8WT 03000 256 000

03000 256 000 cadw.gov.wales

Ty'r Afon Bedwas Road

Welsh Government

Caerphilly CF83 8WT

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Emma Cottam
Senior EIA Advisor
The Planning Inspectorate

Eich cyfeirnod Your reference

EN020035-000008

vyrnwytofrankton@ planninginspectorate.gov.uk Ein cyfeirnod Our reference

Dyddiad

Date

20 Feb. 24

Llinell uniongyrchol Direct line

0300 0250566

Ebost Email: Cadwplanning@gov.wales

Dear Emma

Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Thank you for your letter of 24 January asking for Cadw's view on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the Green GEN Vyrnwy Frankton Project.

The request for the scoping opinion is accompanied by scoping report produced by LUC with chapter 10 considering the assessments required for the Historic Environment. This chapter concludes with five questions and we provide answers to these below.

Q10.1: Do consultees consider the Study Area appropriate?



Yes. In order to assist the applicant, we have identified the designated historic assets in Wales inside the study area in Annex A. We expect that the impact of the proposed windfarm on all of these designated historic assets will be assessed in accordance with the Historic England guidance given in the document "The Setting of Heritage assets: Historic Environment Good Practice Advice in Planning Note 3". We would expect a stage 1 assessment to be carried out for all of the designated historic assets in Annex A, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets. The results of the stage 1 assessment should be included in the EIA, possibly as an appendix.

Q10.2: Are there any other relevant consultees who should be consulted about this topic?

- The Clwyd-Powys Archaeological Trust, who maintain the statutory Historic Environment Record on behalf of the Welsh Ministers.
- The Historic Environment team at Shropshire County Council
- The Conservation Officer at Powys County Council
- Historic England

Q10.3: Are consultees aware of any other supplementary guidance of relevance to assessment of effects to heritage assets?

The Powys CC Archaeology and Historic Environment SPG documents available here https://en.powys.gov.uk/article/4907/LDP-Supplementary-Planning-Guidance-SPG-and-Supporting-Policy

It should be noted that the Historic Environment (Wales) Act 2023 will have been enacted before the EIA is completed and that many associated documents, such as TAN 24, will be updated in accordance with the Act.

Q10.4: Is the approach to the assessment of effects, including those effects scoped in and out and the cumulative assessment, appropriate?

A higher level of importance should be included in section 10.37 for sites of international importance, such as World Heritage Sites.

We concur that those effects scoped in and out and the cumulative assessment are appropriate.

Q10.5: Is the approach to surveys, including geophysical survey, considered appropriate?

There is a need for Lidar data to be fully analysed for the route corridor and there are new National Wales 1 metre DTM and DSM Lidar datasets. Any new sites located by Lidar must be verified on the ground by the archaeological team and mapped, described, photographed and interpreted with images and an accompanying gazetteer of sites included in the report. All sites should be categorized for their importance and the significance of impact stated in the EIA.

If geophysical anomalies are located but are not diagnostic enough to allow informed opinions on dating, function, level of preservation and importance then additional intervention by targeted evaluation trenching may also be required.

A realistic time period should be set aside to complete the archaeological assessment, reporting and mitigation discussion before the application is formally submitted for examination.

Yours sincerely

Jenna Arnold

Historic Environment Branch

Annex A

Within the scoping corridor:

Scheduled Monuments
MG044 Mathrafal Castle
MG077 Bwlch-y-Cibau Dyke
MG078 Plas yn Dinas
MG124 Pentre Camp
MG200 Collfryn Enclosure & Field System
MG231 Bryn y Saethau Hillfort
MG272 Gelli Gethin Round Cairn

Listed Buildings:

7609	Pen-y-Lan Hall	 *
7622	Bryn-glas Hall Also known as Brynglas Devereux	Ш
7636	Lower Trewylan (Trewylan Isaf)	Ш
7645	Ty-newydd	Ш
7646	Parish Church of St Tysilio and St Mary	ı
7647	King's Head Public House	Ш
7651	Glascoed	Ш
7655	Bron-y-Main	Ш
7656	Cwm Farmhouse	Ш
7657	Straw Barn at Cwm	Ш
8508	Church of St. Tysilio	Ш
	Circular Churchyard & Pillar Sundial at Church of	
8509	St.Tysilio	Ш
8510	The Old School adjoining Llandysilio Churchyard	Ш
8511	Ty Coch	Ш
8512	Cowhouse Range to S. of Rhandregynwen	Ш
8520	Rhandregynwen Farmhouse	Ш
8521	C-Plan Group of Farm Ranges to E.of Rhandregynwen	Ш
8661	Tu-hwnt-i'r-gain	Ш
8681	Tyn-y-gerddi	Ш
	Western Bridge over Tanat Feede to N of Clawdd-	
14179	Coch	Ш
	Former Wharfinger's House including brick boundary	
14180	wall to road	Ш
14181	Toll Gauger's Hut to E of No 1 The Locks	II
14182	Pigsty with Walled Pen to E of No 1 The Locks	II
	Crane on North Quayside of Upeer Lock immediately	
14183	E of No.1 The Locks	II
14184	Upper Lock Chamber	II
14185	Lock Gates and Paddle Gear	Ш
	By-Pass Pond and Spillway with Sluice-Gate to south	
14186	of upper lock chamber	II
	Bridge 95 over the Montgomeryshire Canal adjoining	
14187	No 1 The Locks	II
14188	Bridge over by-pass Culvert to NW of No 1 The Locks	II
	Lock-Keeper's Cottage adjoining Lower Lock	
14189	Chamber on Montgomeryshire Canal	II
14190	Lower Lock Chamber	Ш
14191	Lock Gates and Paddle Gear	Ш
14192	By-Pass Culvert and Overflow	Ш
14193	Lower Lock Chamber to W of No 1 THe Locks	II
14194	Pont Lllanymynech (lies partly in Llansdysilio	II *

	Community area)	
4.4000	Four-Arch Aqueduct over Vyrnwy Flood Plain	
14203	(Northern Arches) New Bridge Vyrnwy	II
4.420.4	Three-Arch Aqueduct over Vyrnwy Flood Plain	
14204	(Southern Arches) New Bridge Vyrnwy	II II
14205	Road Bridge over River Vyrnwy	Ш
14206	Aqueduct carrying Montgomeryshire Canal over River	*
	Vyrnwy Wern Bridge (Number 94)	II
14217	Pentref	II
14217	Eastern Bridge over Tanat Feeder to N of Clawdd-	"
14219	Coch	II
15944	Maldwyn	ii
15945	Waterloo House (including former cottage to right)	ii
15946	Waterloo Cottage (formerly Waterloo View)	ii
15947	The Old Post Office	ii
15948	House adjoining The Old Post Office at the N End	ii
15949	Sundial to SW of Tower at Church of St Tysilio	ii
15950	Ty Mawr	ii
15951	Fountain at the fornt of Aldwyn House	II
15952	Rose Villa	II
15957	Stables and Coach-Houses at Pen-y-Lan Hall	II
	'L'-Shaped Range of Farm Builings, including a	
15958	Dovecote at Pen-y-Lan Hall	Ш
15965	Cil Bach	Ш
	Dyffryn Farmhouse, (including railings, dwarf walls	
15968	and gate piers at splayed entrance)	Ш
	Cowhouse and Granary on W side of Farmyard at	
15969	Dyffryn Farm	Ш
	Cowhouse forming N side of Farmyard at Dyffryn	
15970	Farm	Ш
	Stone Building and Calf House, at the E side of the	
15971	Farmyard at Dyffryn Farm	II
15984	Glascoed Mill	II
15985	Pig styles at Glascoed Mill	II
15986	New Bridge Mechain	II
15987	New Bridge Einion	II
15991	Pont Ysgawrhyd	II
15992	Mile Post	II
15993	Stable Building at Ystumcolwyn Farm	II
15994	Brewhouse Range at Ystumcolwyn Farm	II
15995 17402	Wheel House including Barn at Ystumcolwyn Farm Gelli Gethin Farmhouse	II II
17402		II
17403	Melin-y-grug Melin-y-grug Mill	II
17404	Henefail	ii
	Pentyrch Smithy	ii
17410	Rhos-y-Gweision	ii
18362	Ty'n-y-rhos isaf	ii
19017	Capel Newbridge and Adjacent Workshop	ii
26961	Tanhouse Bridge	ii
26964	Ty-mawr Farmhouse	ii
26966	Tan-y-ffridd	ii
82549	Barn at Trederwen House	ii
82551	Bryn Aber	ii
82555	Cast-iron Milepost at Waen	II
82556	Castle Cottage	II
	_	

	Colfryn Farmhouse	II
	Plas Derwen	II
	Pont-y-pentre	II
	Trederwen House	II
83068	Cruck-framed farm-building at Ystum Colwyn	II*
Within a	3km buffer (study area):	
Schedul	led Monuments	
MG005 I	Domen Castell Mound & Bailey Castle	
MG008	Cefn-Du Camp	
MG029 I	Bryngwyn Wood Camp	
MG030 I	Llanymynech Hill Camp	
MG033	Offa's Dyke: Section extending 3000m SE to Bele Brook,	Llandrinio
	Mathrafal Castle	
MG070	Gardden Camp & Barrows	
	Llysun Motte and Bailey	
MG077 I	Bwlch-y-Cibau Dyke	
	Plas yn Dinas	
	Round Barrow 225m SE of Clwyd-yr-onen	
	Camp 135m SE of Pant Mawr	
	Broniarth Hill Camp	
	Clawdd Llesg	
	Clawdd Wood Camp	
	Bwlch Aeddan Dyke	
	Hen Domen	
MG116	Soldier's Mount	
MG124 I	Pentre Camp	
	Rhysnant Hall Castle Mound	
MG158 I	Bryn Mawr Camp	
MG166	Cwrt y Person Moated Site	
MG200	Collfryn Enclosure & Field System	
	Site 300m SW of Tan-llan (revealed by aerial photography	y)
	Bwlch-y-Cibau Enclosure	•
MG214	Carreghofa Castle	
MG216 I	Roman Supply Depot, Llansantffraid ym Mechain	
MG229	Allt Dolanog Hillfort	
MG231 I	Bryn y Saethau Hillfort	
MG232 I	Ffridd Mathrafal Hillfort	
MG233 I	Pen y Coed Hillfort, Cyfronydd	
MG272	Gelli Gethin Round Cairn	
MG320 I	Mynydd Waun Fawr Roman road	
MG327 I	Mynydd y Gribin kerb cairn	
MG330	Clawdd Wood round barrow	
Registe	red Parks and Gardens	
•	o)41(POW) Bryngwyn	
PGW(Pc	o)42(POW) Bodynfoel Hall	
Listed B	Buildings:	
	Church of St Mary	II*

7579	Church of St Mary	 *
7609	Pen-y-Lan Hall	*
7612	Cefn du Uchaf Farmhouse	II
7613	Church of St Trunio	*
7615	Llandrinio Hall	 *
7618	Gwern-Owddy	II
7620	Church of St Mary	II

	No 4 Waterwete Street /Fermonty Twistle Sheemeleeds	
7621	No 1 Watergate Street (Formerly Twist's Shoemaker's Shop)	П
7621	• •	ii
7623	, ,	ii
		ii
	Neuadd Lwyd	
	Church of St. Garmon	*
	Glanbrogan Hall and Brogan-fach.	II
	Plas-Dolanog	 *
	Church of St Cynyw	*
	Lower Trewylan (Trewylan Isaf)	II.
	Bronheulog	
	Church of St Ffraid	* -
	Bronhyddon	II.
	Lion Hotel	II.
	Bodwen	II
	Bridge House, with walled and railed forecourt	
	Cefnllyfnog Farmhouse	* -
	Wyddigoed	II
	Ty-newydd	II .
	Parish Church of St Tysilio and St Mary	1
7647	U	II
	Vyrnwy House (including the front garden railings)	II
	The Old Vicarage	II.
	Pentre'r Gof (also known as Pentrego)	II*
	Glascoed	II
	Ceunant Farmhouse	II
	Straw Barn at Ceunant Farm	II
	Bron-y-Main	II
	Cwm Farmhouse	II
7657		II.
	John Hughes Memorial Chapel (Pontrobert Chapel)	*
8507	Parson's Bridge (No.99) over Montgomeryshire Canal	II
8508	Church of St. Tysilio	II
	Circular Churchyard & Pillar Sundial at Church of	
8509	St.Tysilio	II
	The Old School adjoining Llandysilio Churchyard	II
8511	Ty Coch	II
8512	Cowhouse Range to S. of Rhandregynwen	II
8513	•	II
8514	•	II
0=4=	Cowsheds, Granary & Milking Parlour (Old Stables) at	••
8515	Bryn Mawr	II
0540	Clafton Bridge (No.100) & attached Parapets Flanking	••
8516	Road Approaches	II.
8517	Goolden's Warehouse at Clafton Bridge	II
8518	No. 1 Domgay Hall Cottages & outbuildings to rear	II.
8519	No.2 Domgay Hall cottages & outbuildings to rear	II
8520	Rhandregynwen Farmhouse	II.
8521	C-Plan Group of Farm Ranges to E.of Rhandregynwen	II.
8522	Calcott Hall	II.
8523	U-Plan outbuilding Ranges to N. & E. of Calcott Hall	II.
	Fir Tree	II.
8525	Greenfield House	II
0500	Old Milk Factory (Ice Cremery) adjacent to Greenfield	
	House	II
	The Post Office	II.
8528	House attached to Post Office, including forecourt	II

8529	walls & railings The Golden Lion	II
8530		ii
	Former Domgay Chapel	ii
	Domgay House	ii
	War Memorial	ii
8534		ii
8535		ii
8536		ii
0330	Pentreheylin Bridge (No.97) over The	•••
8537	• · · · · · · · · · · · · · · · · · · ·	П
	Former Salt Warehouse at Newbridge	ii
8539		ii
8540	Bridge (No.101) over Montgomeryshire Canal	ii
8541		II
8542		II
8649		*
	Melin Dol-rhyd	II
8658	•	*
8660	Melin-y-ddol	Ш
8661		Ш
8676	Wern Cottage	Ш
	Gwernfyda (also known as Gwern-y-Fedw) including	
8679	attached barns	*
8681	Tyn-y-gerddi	Ш
8682	Ty-Coch Talwrn	Ш
8691		Ш
	Barn at Pentre-isaf	II.
	Plas-yn-dinas Public House	II
8699	Christ Church Parish Church	II
0700	Sundial in the Churchyard to Christ Church Parish	
8700	Church	
8703 8704		*
0704	Telephone Call-box beside the churchyard gates to St	"
8705	Mary's Parish Church	Ш
8706	The Gro	ii
8707	Pen isa'r llan	ii
8709		 *
8710		 *
8711	, , ,	II
8716	Nos.1-12 (consec) Canal Cottages	Ш
14177	Carreghofa Hall	Ш
14178	Outbuildings Ranges to N. of Carreghofa Hall	Ш
	Western Bridge over Tanat Feede to N of Clawdd-	
14179	Coch	II
	Former Wharfinger's House including brick boundary	
14180	wall to road	II
14181	Toll Gauger's Hut to E of No 1 The Locks	Ш
14182	Pigsty with Walled Pen to E of No 1 The Locks	II
	Crane on North Quayside of Upeer Lock immediately	
14183	E of No.1 The Locks	II.
14184	• •	II.
14185	Lock Gates and Paddle Gear	II
44400	By-Pass Pond and Spillway with Sluice-Gate to south	
14186	• •	II
14187	Bridge 95 over the Montgomeryshire Canal adjoining	II

	No 4 The Leeks	
11100	No 1 The Locks Pridge ever by page Culvert to NW of No 1 The Locks	II
14188	Bridge over by-pass Culvert to NW of No 1 The Locks Lock-Keeper's Cottage adjoining Lower Lock	"
14189	Chamber on Montgomeryshire Canal	Ш
14190	Lower Lock Chamber	ii
14191	Lock Gates and Paddle Gear	ii
14192	By-Pass Culvert and Overflow	ii
14193	Lower Lock Chamber to W of No 1 THe Locks	ii
	Pont Lllanymynech (lies partly in Llansdysilio	
14194	Community area)	II *
14195	Ty-Croes	Ш
14196	Ashfield Stores	Ш
14197	Giulio's Restaurant	II
14198	Nos 1-7 (Consec) Ashfield Terrace	Ш
14199	No 1 The Gardd including outbuilding to rear	Ш
14200	No 2 The Gardd including outbuilding to rear	II
14201	Cottage adjacent to the Presbyterian Chapel	II
14202	Former Warehouse adjoining Trunk Road Bridge	II
4.4000	Four-Arch Aqueduct over Vyrnwy Flood Plain	
14203	(Northern Arches) New Bridge Vyrnwy	II
44004	Three-Arch Aqueduct over Vyrnwy Flood Plain	
14204	(Southern Arches) New Bridge Vyrnwy	II II
14205	Road Bridge over River Vyrnwy Aqueduct carrying Montgomeryshire Canal over River	Ш
14206	Vyrnwy	*
14207	Garth Cottage	"
14208	White Rock	ii
14209	White Rock NE Range of attached outbuildings	ii
14210	Ty-Gwyn	ii
14211	Farm Ranges to East of Ty-Gwyn Farmhouse	ii
14212	Farm Ranges to East of Ty-Gwyn Farmhouse	II
14213	Cottage immediately to the east of Wern School	Ш
	Road Bridge over Disused Railway cutting in centre of	
14214	Wern	Ш
	Carreghofa Aqueduct parallel to the Public Road 700m	
14215	West of Llanymynech	Ш
14216	Wern Bridge (Number 94)	II
14217	Pentref	II
14218	Bridge over Tanat Feeder to NE of Carreghofa Mill	II
44040	Eastern Bridge over Tanat Feeder to N of Clawdd-	
14219	Coch	II
15400	Sundial opposite S porch at church of St Trunio Old School Room	II II
15401 15403	New Hall	II
15403	New нап Kitchen Garden Walls	ii
15405	Outbuildings, formerly of Llandrinio Hall	ii
15406	Outbuilding, formerly of Llandrinio Hall	ii
10-100	Milemarker at roadside about 200m NW of Llandrinio	••
15407	Hall	Ш
15427	Church of the Holy Trinity	II
15428	Old Rectory	II
15429	Barn in Range to W of Tref Nannau Bank	Ш
15430	Maerdy Farmhouse	Ш
15431	Milestone	II
15432	Maerdy Limekilns	Ш
15433	Llwyn Farmhouse	II
15434	Granary at Llwyn Farm	Ш

	Broniarth Farmhouse	
	Burgedin Farmhouse	
	Lodge to Maesmawr Hall (including Gate Piers)	II
	Maesmawr Hall	II*
	Maldwyn	II
	Waterloo House (including former cottage to right)	II
	Waterloo Cottage (formerly Waterloo View)	II
	The Old Post Office	II
	House adjoining The Old Post Office at the N End	II
	Sundial to SW of Tower at Church of St Tysilio	II
15950	Ty Mawr	II
15951	Fountain at the fornt of Aldwyn House	II
	Rose Villa	II
	Ger-y-Nant (Brook House)	II
15954	Ty Bach at Ceunant Farmhouse	II
	Outbuilding to Frondeg	II
15956	Broniarth Hall	II
15957	Stables and Coach-Houses at Pen-y-Lan Hall	II
	'L'-Shaped Range of Farm Builings, including a	
15958	Dovecote at Pen-y-Lan Hall	II
15959	Lych-Gate to Christ Church Parish Church	II
15960	Drinking Fountain	II
15961	Bryn-Derwen Lodge	II
15962	Bryn-Derwen Hall	II
15963	Ysgubor Coed-Oer-Le	II
15964	Ty Rop	II
15965	Cil Bach	II
15966	Ty Brith	II
15967	Pont-y-Ffatri (partley in Llangyniew Community)	II
	Dyffryn Farmhouse, (including railings, dwarf walls	
15968	and gate piers at splayed entrance)	II
	Cowhouse and Granary on W side of Farmyard at	
15969	Dyffryn Farm	II
	Cowhouse forming N side of Farmyard at Dyffryn	
15970	Farm	II
	Stone Building and Calf House, at the E side of the	
15971	Farmyard at Dyffryn Farm	II
15972	Street Farmhouse	II
15973	Bryn Mawr Farmhouse	II
15974	Upper Fawnog	II
15975	Pentregaer Farmhouse	II
15976	Tan-y-Fron	II
15981	Nant-y-Meichiaid Farmhouse	II
15982	Ty Tan-y-Derwen	II
15984	Glascoed Mill	II
15985	Pig styles at Glascoed Mill	II
15986	New Bridge Mechain	II
15987	New Bridge Einion	II
	Lower Peniarth	II
	Malthouse and Granary at Pentre'r Gof, including	
15989	Lean-to on W	II
15990	Goetre	II*
15991	Pont Ysgawrhyd	II
15992	Mile Post	II
	Stable Building at Ystumcolwyn Farm	II
	Brewhouse Range at Ystumcolwyn Farm	II
15995	Wheel House including Barn at Ystumcolwyn Farm	II
	-	

17371	Old Bank House (Deri Dental Practice)	II
17372	Old Bank House (House to the North)	II
17375	Victoria House (now N.F.U. Mutual Office)	II
17376	Brynllys	II
17378	Llanfair Caereinion Public Hall, Institute and Library	II
17382	, , , , , , , , , , , , , , , , , , ,	II
17400	Detached outbuildings to south of Melin-y-ddol	II
17401	Mile Post at Neuadd Bridge	ii
17402	U	ii
17403		ii
17404	, , ,	ii
	Glenfern	ii
	Bethlehem Chapel with house	ii .
17409	•	ii
	Pentyrch Smithy	ii
17411		ii
17412	Milestone	ii
17712	Cottages at Melin-y-Ddol adjoining Ty Gwyn to the	••
17583		II
17923	Bryn Erfyl and Tynllan	ii
	Caerfynnon	ii
17934		ii
	Erfyl House	ii
	Church of St. Erfyl	ii
	Milestone	ii
	Pont Llanerfyl	"
17939	Water Standpost / Fire Hydrant	ii
17939	Maes-gwyn	
17945	Cowhouse and Stable at Maes-gwyn Railings and Gate Piers to Moriah Eglwys	11
10256		II
18356	Presbyteraidd Cymru	
18357	Wynnstay Arms Hotel	
18359	Meas-y-Neuadd	II II
18360	The Vicarage House including Wall and Railings to Bethlehem	"
10261		
18361	Chapel Tyle v rhoe icef	II II
18362		II
18363		II
	Milestone near Llanoddian Hall	II
	The Goat Hotel	II
	Capel Newbridge and Adjacent Workshop	II
	Old Elmtree Farmhouse and attached outbuilding.	II
23530	Capel Saron and attached Chapel House	II
00504	Ann Griffiths Memorial Chapel and Attached House	
23531	,	II
26958	Old Rectory	II
000 = 0	Farm Building at Dolobran including Link Wall to	
	House	II.
	Dolobran Hall	II*
26961		II
	Pont-y-Ffatri (partly in Meifod Community)	II.
26963		II.
	Ty-mawr Farmhouse	II.
	Ffordd Banwy (Old Rectory)	II.
	Tan-y-ffridd	II.
26967		II
26968	Henllan	II

26969	$oldsymbol{arphi}$	Ш
26970		II
26971	Cynhinfa	II
27027	\ \	Ш
27029		Ш
27030	Ty Efyrnwy (former Vicarage) including Coach House	Ш
27031	Pen-y-bryn Farmhouse	Ш
27032	Agricultural Range at Pen-y-bryn Farm	II
27033	Old Pont Dolanog	Ш
27034	Buarth-bachog	Ш
27035	Buarth-bachog Agricultural Range	Ш
	Mill Cottage including Old Corn Mill with Range to	
27037	South and Sheds to East (Felin Dolonog)	Ш
27038	Cowhouse Range at Mill Farm (Felin Dolanog)	Ш
80814	Cefn Pentre	Ш
81010	Detached farm range at Cefn Pentre	Ш
82415	Agricultural Range at Domen Gastell Farm	Ш
82416	Aithnen Canol Farmhouse	Ш
82417	Aithnen Farmhouse with Attached Outbildings	Ш
82420	Bryncynfelin Farmhouse	Ш
82421	Cain Villa	Ш
82422	Domen Gastell Farmhouse	Ш
82423	Llanfechain Bridge	Ш
82424	Llys Farmhouse	Ш
82425	Llys Old Farmhouse and Outbuildings Range	Ш
82427		Ш
82429	Old Rectory	Ш
82430	Old Talbot Inn	Ш
82431	Plas Cain	Ш
82432	Pont Parry	Ш
82433	St Garmon's Church Lychgate	Ш
82434	, <u>, , , , , , , , , , , , , , , , , , </u>	Ш
82435	Talwrn Bach	Ш
82436	The Mount	Ш
82437	Ty Bain	Ш
82438	Ty-coch	Ш
82439	Ty-newydd Farmhouse	Ш
82440	Ty-newydd	Ш
82441	Tyn-y-rhos Farmhouse	Ш
82549	Barn at Trederwen House	Ш
82550	Bronwylfa	Ш
82551	Bryn Aber	Ш
82552	Bryntirion	Ш
82553	Cartrefle	Ш
82554	Cast-iron milepost at Queen's Oak	Ш
82555	Cast-iron Milepost at Waen	Ш
82556	Castle Cottage	Ш
82557	Cleveland House	Ш
82558	Colfryn Farmhouse	Ш
82559	Former coachhouse and stable of the Lion Hotel	Ш
82560	Glanaber	Ш
82561	Gwyndu Cottage	Ш
82562	Llansantffraid Bridge	Ш
82563	Llwyn Onn	Ш
82564	Lychgate to Llansantffraid Cemetery	Ш
	Marwen (No. 2, Rose Cottages), with walled and railed	
82565	forecourt	Ш

82566	Melyniog-fach	II
00507	No. 1 Glandwr (cottage at left), with walled and railed	
82567	forecourt	II
00500	No. 1, Victoria Terrace, with walled and railed	
82568	forecourt	II
82569	No. 2 Glandwr (cottage at right), with walled forecourt	II
	No. 2, Victoria Terrace, with walled and railed	
82570	forecourt	II
82571	No. 3, Rose Cottages, with walled and railed forecourt	II
	No. 3, Victoria Terrace, with walled and railed	
82572	forecourt	II
82573	No. 4, Rose Cottages, with walled and railed forecourt No. 4, Victoria Terrace, with walled and railed	II
82574	forecourt	II
	No. 5, Victoria Terrace, with walled and railed	
82575	forecourt	II
	No. 6, Victoria Terrace, with walled and railed	
82576	forecourt	II
	No. 7, Victoria Terrace, with walled and railed	
82577	forecourt	II
82579	Outbuildings at Melyniog-fach	II
82580	Plas Derwen	II
82582	Pont y Forwyn	II
82583	Pont-y-pentre	II
	Rose cottage (No. 1, Rose Cottages), with walled and	
82584	railed forecourt	II
82585	Sun Hotel	II
82586	Sundial in St Ffraid's Churchyard	II
82588	Trederwen House	II
83068	Cruck-framed farm-building at Ystum Colwyn	 *
84403	Primary House at Rhos Fawr Isaf	 *
84991	Peniarth Uchaf	II
87769	Ty Issa	II



The Planning Inspectorate
Environmental Services Operations Gp3
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email only vyrnwytofrankton@planninginspectorate.gov.uk Your Ref EN020035-000009

Our Ref IPP-205

Wednesday 21st February 2024

Dear Sir/Madam,

EIA SCOPING CONSULTATION ON THE PROPOSED SUBSTATION AND OVERHEAD POWER LINES (THE GREEN GEN VYRNWY FRANKTON PROJECT)

We write in relation to the current consultation on the EIA Scoping in relation to the overhead power lines.

We are the charity who look after and bring to life 76 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a prescribed consultee in relation to Nationally Significant Infrastructure Projects (NSIPs).

The proposed works are for a collector substation and a new 132kv energy connection to carry renewable generated electricity (from a windfarm) to the national grid in Lower Frankton. The proposed overhead lines would be 50km in length and be carried across England and Wales. The Trust own and manage the Montgomery Canal, where it would be impacted by these works. The current proposed route would result in at least two crossings of the canal. The canal is not fully navigable, or all connected to the wider waterway network, however it is subject to active ongoing restoration projects.

The proposal includes the carrying of the overhead power lines via 27m high steel lattice pylons. It is understood that roughly 4 pylons would be required every 1km and would be between 200m and 250m apart. The exact location/details/siting of these is still to be progressed. It is also unclear how wide a corridor would be required for the construction phase to enable the works to be undertaken, we understand that the preferred route is currently shown as 200m wide.

The following sections of the route are relevant to the Trust.

Section 4 - Llanymynech

The preferred route alignment shows a proposed crossing of the canal just to the south of the grade II listed canal bridge no.95 (Carreghofa Bridge). This bridge is not owned by the Trust. We do however own the listed Carreghofa Lock No.2 and the non-designated heritage asset of the canal itself. There is also the grade II listed Three-Arch Aqueduct over the River Vyrnwy in the vicinity of this crossing. The section of canal here is also a designated Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Indeed, we have a record of floating water plantain near here (Luronium natans).

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The section of canal here is also recorded as being carried upon a principle embankment. We also have a record of a sluice here with an outfall which is used to manage and control the water level within the canal.

Section 5 - Maesbury Marsh

The proposed route runs roughly parallel to the canal and then crosses the canal again near to Maesbury Marsh, where the canal is recorded as being on a non-principle embankment and where we have records of culverted water courses under the canal, a weir and bridge no.79 is also in the vicinity of the crossing (again we do not own this bridge). There are also mooring sites recorded as being in the vicinity of the crossing at Maesbury Marsh.

This section of canal is not designated as being within the SAC and SSSI, however it is still an important ecological habitat/wildlife corridor.

EIA TOPICS

Chapter 3 – Underground Cabling Infrastructure

The Trust agree that underground cabling should be scoped into the Environmental Statement. We note that the details set out that using underground cabling may be an option at certain locations, but generally these are in trenches at a depth of 1.3m. It is unclear if it is possible for this depth to be increased. Given this depth of 1.3m, this would not be suitable for the canal crossings. We do note the preference within the documentation for overhead lines, especially as these are easier to maintain. We consider that the crossings of the canal should be underground and that this should be assessed as part of the Environmental Statement.

If cables are to be installed beneath the canal, the proposals will need to be reviewed via the Trusts Third Party Works Code of Practice (CoP) and must include cross sections, site investigation reports, risk assessments and method statements etc. which will need to be reviewed by our geotechnical team to ensure that the canal will not be affected by the works.

In accordance with the Trust's Third Party Works Code of Practice (CoP) Part 2 we would expect any canal crossing to be installed under the waterways and cross perpendicular to the waterway. We would normally expect such crossings to be constructed via trenchless techniques and the crown of the crossing would need to be at least 3.5m below hard bed level of the canal to ensure any settlement does not impact the canal. This would mean that the launch and reception pits would be set well away from the canal to allow the Horizontal Directional Drilling (HDD) to achieve the required depth. We would usually only allow new overhead crossings of the canal if ground conditions are not suitable or other factors affect the route, e.g. buildings, existing buried services, etc. The route and depth of any such crossing, method statements and associated ground investigations will need to be approved by the Trust's geotechnical specialists, all via the CoP process.

The construction technique and method of works would all need to be agreed with the Trust and carried out in accordance with the Canal & River Trust Code of Practice. https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice and particularly to the whole of Part 1 and to Part 2 Section 2 which covers service crossings.

Chapter 7 - Landscape and Visual Amenity

The Trust agree that landscape and visual impacts should be scoped into the Environmental Statement. The waterway and its users (boaters and towpath users) should be recognised as visual receptors with high sensitivity within the Landscape and Visual Impact Assessment (LVIA). The waterway corridors within the corridor of works have the potential to be of a broad range of character types from the waterways passing through urban and rural settings, from open rolling fields, to passing along tree lined cuttings to being carried on elevated embankments. These character types would need to be assessed. We

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welcome that the canal corridors have been acknowledged as potential visual receptors which will be assessed further within the ES.

There are potentially significant temporary effects during the construction and permanent visual effects to the area following completion which would affect the current character, tranquillity and experience of the waterways. It is understood that the intention is for the crossings to be predominantly overground along its length, including the canals. The height and visual clutter of the pylon lattice structures are highly likely to have visual impacts along the Montgomery Canal. This is especially true when an overhead crossing or lateral outward views are exposed or semi-exposed towards the scoping corridor. This is all subject to natural screening from the existing landmass, the built environment, or natural vegetation, of which density and leaf cover are key factors. It is hoped that the LVIA will provide views at different times of the year to review if views change with less leaf cover.

The impact of lighting (temporary and permanent) within the development site should also be considered as part of the LVIA. This should cross-cut with the biodiversity chapter in terms of the impact on protected species and other waterway users which would be particularly susceptible to lighting.

The cumulative impact of any tree removal to facilitate the development would need to be assessed and mitigated accordingly.

In terms of the specific viewpoints it is challenging to interpret the mapping information as the Montgomery Canal is not mapped as a line. We have the following comments on the viewpoints:

Viewpoint 12 - covers Carreghofa Locks and other listed structures within the Llanymynech Conservation Area. The overhead lines will cross somewhere in this area based on scoping boundaries. We would expect the LVIA methodology to give views in this area a high sensitivity rating. It may be appropriate for more than one view if, for example, a single representative view cannot fully encapsulate the baseline and visual impact in proportion to the sensitivity of the landscape or listed structures.

Viewpoint 15 - Similar to viewpoint 12 above, this is a sensitive area whereby the lines will likely cross the Montogomery at some point. We would expect the baseline view to be of high sensitivity. The listed bridge 79 and the nearby crane close to the road crossing read are particularly sensitive. The scoping area is fairly substantial, so it may be that the best view is representative elsewhere.

Viewpoint 17 – Some tall pylons are already in view, with overhead lines near Graham Palmer Lock. We consider that it will depend on the line's exact position and where the view is placed in the landscape. As a representative view, we might be interested in more open areas with existing pylons already in view to access the cumulative impacts of more power lines and pylons.

Regarding other viewpoints, it's a vast area, of which the Montgomery Canal is within a significant part of the scoping boundary. We suggest that additional viewpoints should be considered including:

Limekilns northwest of Llanymynech – there are possibly some open views out to the west where the line is planned from this location. A good representative view to understand the visual impact on the landscape is when the tree cover and landform open out to more far-reaching distant views.

Crickheath seems under-represented. There is an open rural landscape through which the line of the Montogomery (to be restored) passes through. It could be that views are mostly from sunken positions within the cuts of the canal and also intermittent due to hedgerow and field tree boundaries. We think it will largely depend on the proximity of the power lines and pylons if there would be a visual impact.

Chapter 8 - Ecology

The Trust agree that ecology should be scoped into the Environmental Statement. The waterways potentially support rich ecology and biodiversity and the development could have an adverse impact on the ecology of the waterway. The canal at the Llanymynech crossing is a designated Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), there

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is a rare species of pondweed as well as the protected floating water-plantain present here. The potential impact upon these will need to be assessed and considered in accordance with relevant legislation within the ES. Near Frankton there are populations of water voles, so we would need to ensure appropriate protective measures would be implemented during the construction phase, depending on the proximity of the works here to the canal corridor.

The Ecological chapter of the scoping document appears to include all the surveys and impacts reviews and assessments of everything that we would expect to see within this chapter including: protected species, protected sites, invasive species, habitats and species of concern, trees & fishery.

With regards to bats, waterway corridors often form dark havens for bats where they can forage and roost without disturbance from light, which should be protected. The existing trees and hedgerows within the corridor of works also play an important role for bat foraging and commuting as well as potentially for bat roosts. Bats would also be particularly sensitive to the lighting that might be provided within the scheme, especially during the construction phase. Regard would also need to be given to nesting birds and other protected species which may be present along the route.

An assessment of the presence of invasive non-native species will be required on the finalised route corridors and measures must be in place to ensure there is no spread of them during construction or routine maintenance of the pipeline and associated infrastructure. Any invasive species found along the routes would also need to be considered and treated/remediated/removed accordingly to prevent them spreading.

In terms of mitigation and biodiversity net gain there may be potential to consider compensatory planting along our waterways on Trust land in the vicinity of the crossings.

An Angling Society have the rights to fish the impacted stretches of canal, the power lines, if overhead, would prevent a stretch of canal from being fished. There would clearly be a loss in amenity of fishing in these locations, current guidance restricts angling within 30m of an overhead powelines, so this could be fairly significant. These areas/sections, would effectively mean a loss of our fishing rights that we own or at least being able to exercise those rights. This in turn would reduce the value of those rights and potentially impact our ability to generate income from those rights. We would want compensation for this loss. The promotor would also need to cover the cost of warning signage in relation to 'no angling', the posts they are installed upon and the installation costs.

Chapter 10 - Historic Environment

As the majority of the works would be above ground the Trust agree that cultural heritage should be scoped into the Environmental Statement. The waterways are over 200 years old and should be considered as a non-designated heritage asset for the purposes of the assessment.

In general, our waterways fall within the corridor of the works which could experience significant impacts to their setting and significance from the scheme both temporarily during construction and permanently once completed. Indeed, the extent of the works corridors could have an adverse impact on a number of canal related listed assets including bridges, locks, weirs and milepost markers. The ES will need to include an assessment of the heritage and archaeology and the proposed works on these heritage assets and their setting and how the proposals would impact on them in terms of physical and visual impact on views, setting and appearance. Any impacts would need to be mitigated accordingly to avoid harm to significance. We would want to understand the impact of each potential solution (i.e. pylons, underground and the possible hybrid variations).

An extremely thorough Heritage Impact Assessment will be required to inform the development that not only takes account of the formally designated canal-related heritage assets, but also the non-designated elements, especially around the areas of Carreghofa and Maesbury Marsh. We would also expect that the HIA would use comparative examples of the impact of any previous schemes on similar types of heritage assets and settings and how these have been mitigated. We do have concerns in relation to the crossing in the vicinity of the Carreghofa Locks and would need to see further detail to understand the potential impacts here and how this may be mitigated.

Canal & River Trust Planning Team

The construction traffic management plan will need to identify all proposed construction access routes and we would be particularly interested in any routes crossing the canal and the potential impact on the canal bridges, especially listed ones.

At this stage no details of haul roads or construction routes have yet been provided. These may have implications for our bridge assets. Regardless of whether such bridges are owned by the Trust, many are heritage assets and may not be suitable for construction traffic. We would wish to comment further on this matter.

Chapter 12 - Noise and vibration

The Trust agree that noise and vibration should be scoped into the Environmental Statement. The waterway corridors are tranquil spaces and contribute to the health and wellbeing of the nearby residents and users (boaters, anglers, commuters, leisure and recreational users on the towpath). These spaces should be protected from intrusive forms of development and any potential impacts such as noise should be kept to a minimum. We would ask that waterways and their users are included as noise sensitive receptors in the assessment. The proposal both during construction and future operation has the potential to impact on users of the waterway from noise and vibration. This includes boaters (both residential and leisure users) and recreational users along the canal towpaths, as well as wildlife. We consider that boaters/canal users/wildlife should be considered as specific receptors in terms of noise and mitigated accordingly.

Vibrations should also be considered in terms of the potential impact on the canal infrastructure, especially the embankment at the Llanymynech crossing where the canal is on an embankment. It would not appear that the current assessment considers vibration from the installation of the pylons, just construction noise and plant vibration. The assessment should consider vibrations from the foundation details for the pylons crossing the canal and especially if installed using piling. Therefore, in terms of vibration, it would be important that the structural integrity of the canal is safeguarded. The undergrounding of the lines under the waterway would be our preference. We would have significant concerns if the crossings were to be above ground. The undergrounding of the lines would however potentially have an adverse impact on the structural integrity of the canal infrastructure, which is not built to modern engineering standards and is very susceptible to vibration impacts.

At this stage, it is unclear how close construction traffic, plant and machinery would get to the waterway corridor, such activities also have the potential to impact the waterway infrastructure from surcharging or loading our assets. An appropriate buffer should be provided to the canal where no plant, machinery or construction traffic should track, or indeed materials be stored.

Any trees to be removed in the vicinity of the canals or supporting infrastructure should include a methodology for removing trees and treating the roots to prevent shrinkage whilst ensuring that the integrity of the canal is maintained and protected.

Chapter 13 - Water Resource

The Trust agree that water resources should be scoped into the Environmental Statement. The route corridor could impact a number of watercourses and ditches which passes under our waterways via culverts, or in some instance may even discharge into the canals. These would need to be located and protected to ensure the potential for silty waters or contaminants entering the canal is mitigated. Our records indicate that there are a number of culverts in this area, many of which may be sewers or combined sewers and which may cross the proposed line of the works depending on the final route corridor.

The details of how any water is to be captured, treated and disposed of should be considered especially in proximity to the water crossings, especially in terms of dewatering excavations and trenches. Regard would also need to be given to run-off and surface water discharge from the construction compounds.

The Trust is not a land drainage authority and such discharges to our waterway are not granted as of right – where they are granted they will be subject to the completion of a commercial agreement. Given the status of the canal as a SAC and SSSI such consent is unlikely.

Canal & River Trust Planning Team

Any impact on the canal from drainage or flood risk should be included within the ES as this could affect both water quality and quantity and have a wider impact on our network. It would not appear that the current assessment does not considers or includes the potential for flood risk from the canal. We consider that such flood risk should be considered and assessed within the ES.

In terms of the watercourses which the culverts and flood weir feed into could be at risk of siltation during any land clearance and construction works associated with the proposals. Any silt from the works on the site could block the culverts, which would be of concern to the Trust and measures will need to be taken to prevent this. We will need further clarification of the works at these locations to be able to advise on what mitigation measures may be required to safeguard the canal infrastructure. When maintaining our culverts, our contractors use high pressure water jets, and as such high voltage cables directly above these would not be compatible. We would also need to maintain good access to these assets to inspect and maintain them.

Chapter 14 - Ground conditions, geology and hydrogeology

The Trust agree that water resources should be scoped into the Environmental Statement. The chapter includes land instability, but this seems to mainly be focussed on coal mining. It is critical that the land stability of the canal infrastructure is also considered and assessed here. The chapter should also consider ground conditions in terms of construction works in close proximity to the waterway infrastructure which could potentially adversely affect the structural integrity of the waterways. It is essential that structural integrity of the waterways are not put at risk as part of any development proposal, including excavations, drilling, earthmoving or vibrations from plant and machinery which could, in the worst case scenario, result in the failure of the canal infrastructure. Any works near to the canal and towpath will need to consider land stability. We would prefer pylons to be set well back from the canal/towpath to reduce the potential impact. Regard needs to be given to the fact that the working area for each pylon is larger than the pylon footprint and this could impact on canal infrastructure.

Contamination and pollution would have a negative effect on the waterway corridors. We ask that any contaminated land assessment and especially any mitigation considers the canals as sensitive receptors and are considered in any conceptual models.

The contamination assessments should consider the canals as receptors as part of any assessment which would be susceptible to pollution. The location and sealing of any existing drainage across the development sites to the canal should also be considered and addressed. Potential pollution of watercourses during construction would also need to be addressed

Where the route is to pass over or within 250m of a canal and navigable waterway, the Trust should be provided with the relevant geoenvironmental and geotechnical assessments for review and comment.

Any Construction Environment Management Plan should include an environmental pollution emergency response protocol in the event of an environmental pollution taking place. The Canal & River Trust should be included within the pollution response plan. Any stockpiling of materials etc should be sited away from canal corridors.

We would also need to understand what the clearance would be beneath the power lines, although they would be carried on 27m high pylons, the air draft below the lowest cable would be considerably lower than this, especially when taking into account cable sag. The height of the towpath on the embankment is about 6m above ground level at the foot of the embankment in places so a safe clearance over our embankment may be difficult to achieve. We would need to know this clearance as we would need to be able to use plant/machinery below the powerlines when carrying out maintenance along the canal and at the lock. Furthermore, the crossing of the canal embankments via pylons would need to take into account the height of the canal embankment, including without trees, as this may be restrictive to types of plant/machinery we can use to undertake bank works, for example with piling rigs. We would need to understand air draught under the pylons at the point of crossing the canal and the exclusion zones for plant to work safely. It may be the case that bank protection measures would need to be installed under the crossing alignment to future proof that section of canal as part of the works. If there are trees present on the canal embankment, then we would need to understand how these would be managed as the roots may

Canal & River Trust Planning Team

be aiding the stability of the canal embankment. Clarification in relation to ongoing management of trees and vegetation under the lines would also be welcomed.

A robust and comprehensive Construction Environment Management Plan (CEMP) would be required to include aspects of how materials, fuels, chemicals and wastes will be stored and where; measures for the prevention of dust generation and windblown litter and debris; measures to prevent run off into the canal and culverts (e.g. of silty water, contaminated water, fuels and chemicals); pollution response emergency procedures and details of any planned water abstractions and /or discharges from or which may impact upon the canal.

Chapter 16 - Air Quality

The Trust agree that air quality should be scoped into the Environmental Statement. The canals should be identified as sensitive receptors particularly with regards to dust emissions during construction and the significant excavations that would be required. Mitigation measures should be set out to ensure that regular checks of the waterways are undertaken during construction and for a period following completion of the works.

The waterway users should be identified as sensitive receptors that may be affected. It should be clarified that users of the waterway for recreation, boaters, both leisure users and residential, along with pedestrians and cyclists on the towpaths as well as wildlife are all sensitive receptors, especially during construction.

There is also a cross over to the ecology chapter in relation to the protected floating water-plantain present here within the canal. It is understood that this species may be susceptible to air pollution, and this should be considered and assessed.

Chapter 17 - Cumulative Effects

There are ongoing projects to restore the Montgomery Canal and to fully connect it to the wider waterway network. Indeed, there has recently been a successful bid on the Levelling Up Fund, in partnership with Powys County Council and supported by the Montgomery Canal Partnership to restore a section of canal. The 4.4-mile section of canal between Llanymynech and Arddleen has not been navigable since the 1930s, and this phase of restoration aims to restore the channel so that navigation will eventually be possible.

The proposed overhead powerlines at Llanymynech would cross the canal in very close proximity to one of the new road bridges that is to be installed as part of the restoration project. This is known as Williams Bridge (no.96). The original bridge was removed with only the remaining abutments now visible. At present the B4398 road passes at grade over the former canal. As part of the restoration works, the highway here will be required to be modified to enable bridge clearance over the canal to allow navigation. Options are currently being explored in terms of the most feasible and cost-effective intervention here.

Due to the need to mitigate the potential impact that boat navigation on the restored canal may have on the protected floating water plantain within the canal, then offline nature reserves are required to be created to mitigate the impact. The current intended site for these offline reserves would be to the south of River Vyrnwy, downstream and south-east of the Vyrnwy Aqueduct and based on the current powerline routing plans would be just within the corridor for the power lines. We would ask that the route is modified to avoid this area. Clarity is needed on this and the promoters need to take this into account when considering cumulative impacts. There are archaeological sensitivities with this land as there was formally a manor house, now demolished close to the canal and the area the Trust is looking at part of its parkland. Although not a designated heritage asset, it is relevant to any assessments, particularly given the archaeological potential of the parkland as wells as views across the area from the high ground to the west with the canal in the foreground.

It is of critical importance that the proposed powerline project does not hinder or prejudice the future restoration of the canal and required associated infrastructure and mitigation.

List of potential consultees

Canal & River Trust Planning Team

It is very disappointing that the list does not include the Canal & River Trust, despite us being a prescribed consultee and a landowner that would be impacted by the works.

The Trust as Landowner

The Trust own and manage the Mongomery Canal, water and the towpath network in the vicinity of the proposed route crossings that we have identified above. We also have other landowner interests in the vicinity of the Llanymynech crossing point. Separate discussions would need to take place between the Trust and the applicant in terms of any formal agreements that may be required for crossing our land. Please note that as a Statutory Undertaker, the Trust would seek to challenge the use of any compulsory purchase powers to acquire rights over any of our land. Accordingly, to avoid unnecessary delay and the incurrence of excess costs, any acquisition of Trust land or rights should be arranged voluntarily.

Finally, the Trust will require any works to comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust" and the applicant is advised to contact the Works Engineering Team by emailing Enquiries.TPWNorth@canalrivertrust.org.uk in order to ensure that any necessary consents are obtained.

The above comments are given without prejudice to any further matters that may be raised during the consenting process or by other parts of the organisation.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Tim Bettany-Simmons MRTPI

Area Planner & Special Projects

@canalrivertrust.org.uk

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

From: Rhys Cadwaladr (AMG) To: **Vyrnwy to Frankton**

Gwawr Teleri Hughes (AMG): Keira Ann Sweenie (AMG) Cc:

Subject: ATB/RE: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 15 February 2024 17:31:24

Attachments: image001.png

image002.png image003.png image004.png image005.png image006.jpg image007.png

Dydych chi ddim yn cael negeseuon e-bost gan

@gwynedd.llyw.cymru yn aml. <u>Dysgu pam bod</u>

hyn yn bwysig

Dear Mr Todd Brumwell.

Thank you for consulting with the Gwynedd LPA and offering the opportunity to provide comments on the scoping direction for an ES. The proposed search area for the OHL is located at significant distance to closest point of the LPA (Approximately 18km to Aberangell, and 26km to the southern tip of the Parish of Llandderfel respectively). Given these significant distances and current guise of the development I do not consider there to be any potential for visual impact on IPA area.

Yn gywir,

Rhys Cadwaladr

Uwch Swyddog Cynllunio Mwynau a Gwastraff / Senior Minerals and Waste Planning Officer

Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru / North Wales Minerals and Waste Planning Service

Gwasanaeth Polisi Cynllunio, Tirwedd a Natur / Planning Policy, Landscape and Nature Service Adran Amgylchedd / Environment Department

Cyngor Gwynedd

Stryd y Jêl,

Caernarfon,

Gwynedd,

LL551SH

Rhif Ffôn Uniongyrchol / Direct Telephone Number - |

Rhif Ffôn Canolfan Gyswllt Cyngor Gwynedd / Cyngor Gwynedd Call Centre - 01766 771000 E-bost Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru / North Wales Minerals and Waste Planning Service E-mail - mineralsandwaste@flintshire.gov.uk

E-bost Gwasanaeth Cynllunio Cyngor Gwynedd / Cyngor Gwynedd Planning Service E-mail cynllunio@gwynedd.llyw.cymru



From: Sarah Stubbs
To: Vyrnwy to Frankton

Subject: ENO20035 - Green GEN Vyrnwy Frankton EIA Scoping

Date: 21 February 2024 16:59:14

Attachments: <u>image001.png</u>

Highway Comments EIA GEN Vyrnwy.pdf

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FAO Todd Brumwell

Ref: ENO20035 - EIA Scoping Notification and Consultation - Green GEN Vyrnwy Frankton Project Nationally Significant Infrastructure Project (NSIP).

I am writing in response to your email and letter dated 24th January 2024 inviting comments from Denbighshire County Council.

Consultations have been undertaken with the AONB Joint Advisory Committee for Denbighshire & Flintshire along with the Councils Highways, Public Protection and Footpaths Officers. The only response received is from Highways, which is attached.

We have no further comment at this stage.

Kind regards

Sarah Stubbs BA (Hons) MSc MRTPI Prif Swyddog Cynllunio/Principal Planning Officer

Gwasanaethau Cynllunio, Gwarchod y Cyhoedd a Chefn Gwlad/ Planning, Public Protection and Countryside Services

Tel/Ffon:

E-bost <u>@sirddinbych.gov.uk</u>
E-mail <u>@denbighshire.gov.uk</u>

Rydym yn croesawu gohebiaeth yn Gymraeg a ni fydd unrhyw oedi wrth ymateb i ohebiaeth a dderbyniwyd yn Gymraeg.

We welcome correspondence in Welsh and there will be no delay in responding to correspondence received in Welsh.



Gwefan/Web Site: www.sirddinbych.gov.uk/www.denbighshire.gov.uk

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Mae'r wybodaeth a gynhwysir yn yr e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag o wedi eu bwriadu yn unig ar gyfer pwy bynnag y cyfeirir ef ato neu atynt. Os ydych wedi derbyn yr e-bost hwn drwy gamgymeriad, hysbyswch yr anfonwr ar unwaith os gwelwch yn dda. Mae cynnwys yr e-bost yn cynrychioli barn yr unigolyn(ion) a enwir uchod ac nid yw o angenrheidrwydd yn cynrychioli barn Cyngor Sir Ddinbych. Serch hynny, fel Corff Cyhoeddus, efallai y bydd angen i Gyngor Sir Ddinbych ddatgelu'r e-bost hwn [neu unrhyw ymateb iddo] dan ddarpariaethau deddfwriaethol.

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----Original Message-----

From: Joseph Baker @denbighshire.gov.uk>

Sent: Thursday, February 8, 2024 7:46 AM

To: Sarah Stubbs @denbighshire.gov.uk>

Subject: RE: Scoping Opinion Consultation - App ref 00/2024/0006

Hi Sarah

They seem to be scoping in the main Highway related concerns into the EIA (although the scoping corridor is a significant distance from our County border). Although Denbighshire is a significant distance from the scoping corridor (in which case I would suggest it would be on the limit of local concrete plants providing concrete due to the setting time during transport) I would like to request any details of quarries they may intend using in Denbighshire for aggregate etc and quantities expected.

Thanks

Joe Baker

Peiriannydd Rheoli Datblygiad Priffyrdd / Highways Development Control Engineer Gwasanaeth Cynllunio a Gwarchod y Cyhoedd / Planning and Public Protection Symudol / Mobile: 07827984611

E-bost: @sirddinbych.gov.uk / E-mail: @denbighshire.gov.uk Gwefan: http://www.sirddinbych.gov.uk / Website: http://www.denbighshire.gov.uk

Rydym yn croesawu gohebiaeth yn Gymraeg. Ni fydd unrhyw oedi wrth ymateb i ohebiaeth a dderbyniwyd yn Gymraeg .

We welcome correspondence in Welsh. There will be no delay in responding to correspondence received in Welsh

creating a better place for people and wildlife



Emma Cottam
The Planning Inspectorate
The Square,
Temple Quay House,
Temple Quay
Bristol BS16PN

Our ref: XA/2024/100057/01-L01

Your ref: EN020035

Date: 21 February 2024

vyrnwytofrankton@planninginspectorate.gov.uk

Dear Emma,

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)

Thank you for consulting us on the EIA Scoping Opinion for the above project. We have reviewed the Scoping Report, referenced EN020035 and dated 24 January 2024, and have the following advice:

Insofar as it relates to our remit, we broadly agree with the topics that have been scoped in and scoped out of the EIA and would like to make the following comments. These are in the order prescribed by the Scoping Report for ease of reference.

Chapter 8 – Ecology

Q8.1: The scope of the ecological baseline surveys appears appropriate for the size and scale of the project. We advise that the UKHAB system is used to classify habitats as opposed to Extended Phase 1, as the BNG Metric uses the UKHab classification methodology.

It is positive to see an attempt to minimize loss of trees and woodlands during tower siting, and it is positive that towers and works will avoid waterbodies and associated terrestrial habitat as far as is practicable.

During the construction phase, we advise that any open trenches are covered over during the night to avoid accidental trapping of any wild mammals. We would also advise that there is no direct lighting of any watercourses to avoid disturbance to nocturnal and light-sensitive species such as otters and bats.

Please note, the CIEEM Advice Note 'On the lifespan of ecological reports & surveys' states that the results of most ecological surveys are valid between 12-18 months. If construction commences 18 months following the survey dates, some or all of the ecological surveys may need to be updated.

Q8.2 We understand that fish have been 'Scoped Out' as significant impacts are not expected. However, if the design changes to incorporate watercourse crossings by underground cable (as opposed to spanning with overhead wires) or to include inchannel works, then we would strongly advise that fish are 'Scoped in' during the construction phase.

We understand that water voles have also been 'Scoped Out' for the same reason as the above. If designs change to incorporate works on or near the banks of watercourses, we would advise that water voles are 'Scoped in' during the construction phase, and that a dedicated species survey is conducted as part of the ecological baseline surveys.

There are records for grass-wrack pondweed, a nationally scarce aquatic plant, located at Montgomery canal, Aston Locks - keeper's bridge SSSI. If the EIA determines that the SSSI will be impacted by the proposed project, we advise that this species is 'Scoped In' during the construction phase.

There are records for multiple Invasive non-native Species (INNS) within and adjacent to the Scoping Corridor, such as Himalayan Balsam, Japanese knotweed and Nuttall's Waterweed. Under the Wildlife and Countryside Act 1981 (as amended), it is illegal to spread any plant listed in Schedule 9. There is no consideration of Biosecurity or INNS within the Scoping Report, therefore, we strongly encourage the applicant to 'Scope In' biosecurity measures to reduce the risk of spreading INNS during the construction phase.

Q8.3: The Environment Agency holds data on fish, invertebrates and macrophytes, which are available to view on the EA Ecology & Fish Data Explorer. Additional ecological data can be obtained from the Shropshire Ecological Data Network.

Q8.4: The applicant proposes a pragmatic approach to assessing bat activity throughout the year. We agree that it is more suitable for detailed roost assessments to be planned pre-construction, based on the results of the bat activity surveys.

In addition to re-planting felled trees as enhancements, the applicant could install bat boxes on trees in the riparian corridor of watercourses. If hedgerow removal is required to facilitate access during construction within the watercourse corridors we advise that gapped hedgerows are replanted to provide a continuous dispersal corridor for bats.

Regarding the questions posed in Chapter 9 Ornithology, we advise that Natural England are consulted with regards to the Midland Meres & Mosses Phase 2 Ramsar.

Regarding the questions posed in Chapter 17 Cumulative Affects we agree with the proposed approach with regards to assessing the cumulative effects of other projects, which could have an impact on biodiversity within the Scoping Corridor.

General Comments

Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS)

BNG is not a legal requirement for NSIPs until November 2025. However, we strongly encourage the applicant to seek to provide a minimum of 10% BNG as good practice. It is positive to see that the applicant plans on calculating BNG. However, as of November 2023 the statutory (official) version of the biodiversity metric tool was released, therefore we advise the applicant uses this tool instead of version 4.0. We advise the applicant submits a Biodiversity Gain Plan, outlining how the project will deliver BNG.

The Watercourse Unit will need to be included in the Biodiversity Metric calculation if a river, stream or canal lies within the boundary of the proposed working area, or is located 10 metres from the boundary of the proposed working area. The Watercourse Unit will also need to be included if a ditch is located within 5 metres of the proposed working area.

Aside from re-planting within the wayleave corridor, other BNG opportunities could include enhancing nearby habitat (such as woodland), planting species-rich wildflower strips underneath overhead lines and restoring degraded habitats (such as gapped hedgerows).

The LNRS Responsible Body for Shropshire (Shropshire Council) is currently in the information gathering stage of producing a local habitat map for the LNRS plan. When complete, we advise that the applicant refers to the Shropshire local habitat map to inform decisions on where to site biodiversity enhancements.

River Basin Management Plans (RBMPs)

We strongly advise that any biodiversity enhancements around waterbodies compliments the local environmental objectives and programmes of measures set out in the Severn RBMP, such as managing the spread of INNS or avoiding physical modification of watercourses.

Chapter 13 Water Resources

Flood Risk

General Comments

Large parts of the proposals are located within Flood Zone 2 and 3, land assessed as having between a 1 in 100 and 1 in 1,000 annual probability (1% - 0.1%) and land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) in any given year. Other parts are located within Flood Zone 1 which is land defined as a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) in any given year.

Where development is located within Flood Zone 3b (functional floodplain), essential infrastructure (such as power stations and sub stations etc) that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere

We advise that the applicant scopes in flood risk when reviewing operation to ensure the proposed development is functional in times of a flood and remains safe.

In accordance with National Planning Policy Framework and the sequential test (paragraph 161), development should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised.

The Scoping Report does not have substantial information in relation to flood risk. However, we note the intention to submit a flood risk assessment (FRA) as part of the DCO application (13.25). The FRA must demonstrate that the proposal will remain operational during the lifetime of the development and that appropriate mitigation measures/flood resilient construction techniques have been incorporated into the development for its lifetime,

If there is any above ground construction that is in an undefended area, any increases in the footprint of the buildings will require floodplain compensation; the FRA needs to consider floodplain compensation on a level for level, volume for volume basis. With regards to floodplain compensation, we would usually consider the 1 in 100 year plus 44% allowance for climate change flood height as the 'design flood'. The FRA also needs to ensure that there is no increase in flood risk to third parties because of this development, for example by altering flood flow routes

Environmental Permitting Regulations

If any of the works are likely to require a FRAP under the Environmental Permitting Regulations, we recommend the applicant consider early on whether they might consider the disapplication of the EPR and matters pertaining to FRAPs be considered as Protective Provisions under the DCO.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

• in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Assets

We would also like to highlight to the applicant that they will need to:

- Survey the pre- works and post-works condition of the assets they will be interacting with and remediate any defects identified.
- Monitoring vibrations and identifying safe levels which don't adversely affect assets

Modelling

General Comments

The lower catchment area threshold for Flood Zone mapping is a catchment area of 3km². There are watercourses shown in the Detailed River Network (DRN) which bisect the cable corridor which have no associated Flood Zone mapping. This is not because there is no flood risk associated with these watercourses, it is simply because the catchment area is below the 3km² threshold for which Flood Zone mapping was undertaken. Please bear this in mind when evaluating flood risk within the cable corridor. If infrastructure is to be placed in the vicinity of these watercourses, then investigation and potentially hydraulic modelling may be required.

Section 13.13 states that "future baseline conditions would be forecast by NRW and the EA". The applicant should be mindful that it is important, when using Environment Agency modelled data, to check that it is suitable for their needs and representative of current baseline conditions. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023), details below.

The applicant should consider the following guidance:

- Using Modelling for Flood Risk Assessments Guidance (December 2023).
 Available online at: <u>Using modelling for flood risk assessments GOV.UK</u> (www.gov.uk)
- Flood Risk assessments: climate change allowances (2022): Available online at: Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)

Depending on the age of the model data, updates to the hydrological data and model schematisation may be required.

For information, model data from the Environment Agency can be requested via enquiries_westmids@environment-agency.gov.uk. Furthermore, information relating to the Detailed River Network (DRN) and Statutory Main Rivers are available from environment.data.gov.uk.

The Environment Agency also holds a detailed mode within the cable corridor, the Severn-Vyrnwy confluence model (JBA, 2011). Please note the age of the hydrological assessment used in this study (2007). It would be sensible to review this along with the hydraulic model schematisation particularly if this model is required to inform the Flood Risk Assessment

Water Resources

Q13.1We are pleased that Hydrogeology, GWTEs, PWS and other abstractions have been scoped in as receptors potentially at risk from the construction or operation of the development. The route East of Oswestry and the substation search area are within source protection zone 3 for Severn Trent potable water supply groundwater abstractions at Rednal and Kinshall. Source protection zone 1 and 2 for the Kinshall source are also within the search area.

Q13.2: Dewatering activities can extend to the removal of water from excavations or more significant pumping of groundwater to lower local water levels for an excavation. These activities were previously exempt from requiring an abstraction license.

Since 01 January 2018, new planned dewatering operations above 20 cubic meters a day will require a water abstraction license from us, prior to the commencement of dewatering activities at the site they do not meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of our regulatory position statement for de-watering discharges.

Consumptive abstraction from Groundwater may not be available for new licences, more details can be found in the <u>Abstraction Licensing Strategy</u> for the catchment. If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted. Examples of (consumptive) intervening uses include: dust suppression; mineral washing; washing down machinery and potable supply.

We recommend engaging our National Permitting Service (NPS) early in the project planning for further advice.

Q13.3 We note that whilst WFD cycle 3 data is included in baseline conditions and in future desk studies (in section 13 for example), the need for a WFD assessment is not explored in the scoping report. Many NSIPs have the potential to affect and also potentially contribute toward the achievement of the aims and objectives established

by the WFD and we would like to see this considered. <u>Planning Inspectorate (2017)</u> <u>guidance entitled Advice Note 18: The Water Framework Directive</u> provides an outline methodology for WFD as part of the DCO process.

Water Quality

General Comments

Overall, we support the approach taken with regards to water quality. However, we would like to provide the following comments to ensure that the tertiary mitigation proposed is appropriate.

Water discharge activity permits are required to carry out discharges of sewage and trade effluent in England unless an exemption applies. The Regulatory Position Statement (RPS) on <u>Temporary dewatering from excavations to surface water</u> may apply to some aspects of this project. However, all of conditions of this RPS must be met and any discharges that are unable to do so will still require an environmental permit. We recommend that this requirement for environmental permits is reflected as tertiary mitigation is developed. Methods to ensure compliance with the RPS and any environmental permits should be secured through an appropriate mechanism, such as the Construction Environmental Management Plan. There is currently a significant timeframe involved with determining water discharge activity permits, and so we encourage the applicant to engage with us on permit requirements at the earliest possible stage.

Within the scoping report the applicant confirms that a Construction Environmental Management Plan (CEMP) will be produced, which will manage potential effects on water resources during construction. Large construction sites often cause pollution due to the production of an insufficient CEMP or the failure of contractors to follow the CEMP. To reduce this risk, the EA recommends ensuring that the CEMP includes pollution prevention measures that can withstand significant heavy rainfall events. Additionally, we recommend the inclusion of monitoring, reporting, and reviewing procedures to ensure the project team and principal contractor have sufficient oversight of the contractors that they employ.

The applicant does not identify the likely fate of sewage produced during construction. If disposal to public sewer, the applicant should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If treatment and discharge at the site is required, the applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. If road transport to an offsite disposal facility is required, then the applicant should have regard for this within their waste management procedures.

Section 13.9 states that the majority of watercourses have a chemical status of "High". This is incorrect, as all watercourses in England have a chemical status of "Fail" as of 2019. Although it does not necessarily change the outcome of the scoping report with regards to water quality, it does mean that the sensitivity of possible receptors may not have been properly described. We suggest ensuring that the baseline conditions are updated to reflect current WFD status for all waterbodies within the study area.

Chapter 14: Ground Conditions, Geology and Hydrogeology

General Comments

The proposed overhead power cable route lies over a Principal Aquifer (Permo-Triassic Sandstone Kinnerton and Chester Sandstone Formations) and designated groundwater source protection zones for three public water supply sources at Rednal, Kinnerly and Kinsall in the north of the route. The principal aquifer vulnerability varies from low to high along the route depending upon the degree of protection afforded by the composition and thickness of the intervening drift. Perched systems are likely to be present in the Chester Pebble Beds. The site is therefore of high sensitivity.

This section states that potential temporary and permanent significant effects (from construction and operation) to sensitive receptors including important water resources, including part of the corridor falling within a Source Protection Zone, and GWDTEs will be scoped in for further assessment.

Paragraph 14.22 states that, "Where possible, towers, collector substation and cable sealing end compound will be positioned to avoid impacts on PWSs & GWDTEs." All hydrogeological receptors should be protected from impacts from the proposed infrastructure. This includes the Principal Aquifer, licensed abstractions and private water supplies, which must all be assessed in the Environmental Impact Assessment. Additional information about private water supplies is given below.

Table 14.1 says that potential contaminated land and existing (active and former) landfills are present within the Scoping Corridor and further assessment will be undertaken as identified in the standard/embedded mitigation. However, based on the proposed scheme, the potential for significant effects are considered unlikely and this element has been scoped out of requiring assessment in the EIA.

Our records show that there are three historic landfill sites within the scoping corridor – 'Oswestry Bypass / Field to North Of Queens Head', 'Rednal Landfill', and 'Field At Inglewood, Aston'. These have been identified within the scoping report (Figure 14.1).

A preliminary risk assessment desk study will be undertaken in relation to, amongst other factors, landfills and contaminated land. This will be completed in line with our LCRM guidance and we would expect that if any contamination is identified it will be managed appropriately and measures taken to remove any identified risks. We welcome this approach.

Paragraph 14.23 states that, "A Foundation Works Risk Assessment will be secured via a suitable condition of planning for permanent ground-based infrastructure to understand potential impacts on hydrogeology including GWDTEs and PWSs (where it has not been possible to avoid through design). Where required, this will include suitable mitigation measures to minimise potential effects."

We would expect a FWRA to be secured via a requirement of the DCO or within the CEMP.

We welcome the inclusion of pollution prevention measures in the proposed Construction Environmental Management Plan (CEMP) and will review this when it becomes available.

Private water supplies

Given the rural setting, reliance on private wells and boreholes for drinking water supply to individual residential buildings and business is common in this area. The applicant should contact the local authority for details of private water supplies and this dataset should be included within the EIA. These supplies are likely to source groundwater stored within either shallow perched drift aquifers, or the deeper principal sandstone aguifer.

The EIA should identify these sources, the sensitivity of the quality of these features, and the need to employ pollution prevention and control procedure during construction. Known private supplies with 250 m of the proposed overhead line route should be identified. The locations and grid references provided should be for the precise location of the well or borehole source. An SPZ should be applied to all private abstractions. These SPZ1 should be identified within the EIA. In the event of construction going ahead these features should be located and provision made to provide protection against potential contamination arising from the construction phase to the underlying groundwater environment.

Shropshire Groundwater Scheme

The Environment Agency's future proposed Phase 7 would comprise two separate groups of groundwater pumping development. One group of two wells located to the north and west of the draft route, and four wells to the south and east. The draft overhead power line route passes close to two groundwater pumping station locations. The potential development of the overhead line in this area should not present a significant constraint on the future construction and maintenance of the infrastructure making up the Environment Agency's proposed Phase 7 area of the Shropshire Groundwater Scheme.

The Environment Agency should be contacted as part of the planned desk study work to obtain relevant information about the Shropshire Groundwater Scheme.

<u>Underground cabling</u>

Section 3.11 makes reference to underground cabling that may be required in sections of the development. It goes on to state that, "However, the undergrounding of cable infrastructure, whilst reducing visual impacts in the most highly sensitive locations, does generate additional impacts due to ground disturbance that would otherwise not occur with an OHL. This is particularly pertinent for ecological, archaeological and hydrological receptors."

It is noted that hydrogeological receptors have not been mentioned.

And paragraph 3.12 states that, "It is therefore essential that any proposals for undergrounding of the cable infrastructure include a detailed consideration of the likely significant effects associated with their construction to ensure that an appropriate balance is achieved that is consistent with planning policy."

Hydrogeological receptors, including the groundwater in aquifers and all groundwater abstractions within the search area, should be included in this assessment. This work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. The proposed use of directional drilling techniques should therefore be included in the CEMP.

This includes the use of drilling muds for the horizontal directional drilling that may be employed within the construction element of the scheme.

Where the placement of these cables takes place in land affected by contamination the management of the waste material will need to be carefully managed.

Foundation and groundwater flow

Paragraph 3.24 discusses the installation of foundations for the towers. Groundwater is particularly vulnerable in some locations along the route. Consideration should be given to whether the foundations in sensitive groundwater locations, for instance, within SPZs, will impede local groundwater flow. It is acknowledged that the installation of the pylons with not have a detrimental impact on the larger catchment scale regional groundwater resource balance.

Information about environmental permits

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk)

If they don't meet the exemption and require a full abstraction licence they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here,

Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here,

<u>Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)</u>

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used onsite under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to our:

- Position statement on the Definition of Waste: Development Industry Code of Practice and;
- website at https://www.gov.uk/government/organisations/environment-agency for further guidance

Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Further Advice

The Environment Agency would welcome the opportunity to engage and advise further on the matters outlined above.

Further engagement at the pre-application stage will provide the applicant with confidence and clarity in relation to our position on the DCO proposals prior to formal submission and outside the statutory engagement process. It should also result in a better quality and more environmentally sensitive development.

This would fall within the scope of our Cost Recoverable Planning Advice service, and would be subject to a fee of £100 per staff hour of time. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems.

We will contact the applicant further in relation to this, but in the meantime should they wish to gain our views on any draft assessments or proposals please contact us at $\underline{\text{NITeam@environment-agency.gov.uk}}$ for a quote. The terms and conditions of our charged for service are available $\underline{\text{here}}$.

Yours sincerely

Paul Gethins Planning Specialist - National Infrastructure Team

Direct dial

Direct e-mail: NITeam@environment-agency.gov.uk

 From:
 Allen, Tim

 To:
 Vyrnwy to Frankton

Cc: Nicholas, Matthew; Midlands ePlanning; Taylerson, Kezia

Subject: HISTORIC ENGLAND ADVICE our ref PL00795074 FW: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 21 February 2024 18:27:32

Attachments: image007.png image008.png

image000,png image010.jpq image011.pnq image012.pnq image013.jpg image010677.jpg

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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

Dear Mr Brumwell

Thank you for consulting us on this NSIP EIA Scoping in respect of the above development.

We encourage an iterative approach starting from desk based sources, it will be crucial to the minimisation of impacts and their mitigation that the environmental assessment process captures not just the impacts at pylon sites and associated infrastructure such as jointing compounds but also associated haul roads, laydown yards and works compounds (including those created for / by subcontractors).

Whilst radii are necessary to a structured approach to the consideration of assets and impacts it is important that professional judgement is deployed to ensure that assets whose significance rests heavily upon structured view and vista's – whether designed or consequential on their location – are assessed appropriately, this may mean bring into the assessment some assets at greater range from the pylons and substations. Likewise, in the banding of asset importance it should be born in mind that some unlisted buildings may deserve treating in the same band as GII and some GII listed buildings will deserve treating in the same band as GII* depending upon their merits. Undesignated monuments are of demonstrably equivalent importance to scheduled sites should be treated on parity and robust assessment measures put in place to ensure that where such importance may exist it is tested and demonstrated at the earliest opportunity so that it can inform design .

We were encouraged to see the incorporation of data relating to non-designated archaeological remains including previous area and thematic studies alongside HER data, lidar, aerial and cartographic sources etc.

We note the proposed banding of impact across *total loss / substantial harm / less than substantial harm* etc – this is unlikely to produce satisfactory outputs given the breadth of severity of impact encompassed by the NPPF's less than substantial harm – we strongly suggest more work done on refining this aspect of methodology – we can discuss.

We would caution that many areas of the landscapes traversed by this route can appear relatively 'blank' (this is especially the case in case of drained wetlands / mires), this can be a function of a lack of previous investigation rather than an absence of archaeology. A failure to adequately investigate could result in significant discoveries only being encountered at a point when mitigation options are restricted due to the lateness at which they are encountered, which may result in delays to project timescales and increased costs.

The project will traverse through areas of high paleoenvironmental potential as indicated by the geological peat mapping but potentially both more extensive and localised. We would strongly recommend that the project seeks to develop preliminary desk based deposit model as part of the DBA. This could seek to characterise Fen areas where geophysics would be a challenge and build up an archaeological sensitivity map to help highlight areas of archaeological potential. This could then be enhanced by GI and geoarchaeological work. We would be happy to discuss this further with the project team.

Without prejudice to the results of detailed assessment we highlight the following assets and resources:-

The setting of the scheduled Hillfort Lanymynech MG030 located in Wales and the area of Roman Road / route of Offa's Dyke to its south would be for our colleagues in Cadw to lead but clearly also have setting effects in association with assets in England including scheduled sections of Offa's Dyke and the Industrial SM to immediate English side of Lanymynech Hillfort which is National Heritage list for England ref 1021412 https://historicengland.org.uk/listing/the-list/list-entry/1021412? section=official-list-entry

The Grade II* listed St Winfred's Well Shropshire https://historicengland.org.uk/listing/the-list/list-entry/10542452 section=official-list-entry and associated pilgrimage routes.

Mires, peatlands and duck decoy's – these are often evidenced on mid 19th century OS 1" mapping and tithe maps / enclosure awards but already absent by the time of late 19th Century 1:2500 scale maps – this should be meshed with geological records, existing survey and lidar to build an initial deposit model to inform further work.

Bromwich Park moated site and formal garden remains https://historicengland.org.uk/listing/the-list/list-entry/1017006

Views from edges of the corridor for example:

Motte castle adjacent to St Michael's Church – WEST FELTON MOTTE https://historicengland.org.uk/listing/the-list/list-entry/1019296

and

Hisland Castle Mound https://historicengland.org.uk/listing/the-list/list-entry/1013497

ASTON HALL https://historicengland.org.uk/listing/the-list/list-entry/1307603 and its associated parkland

Detailed consultation with the local authority curators and or colleagues in Cadw is essential, we would welcome the formation of a project wide consultation group.

We would strongly recommend that project team refer to Historic England's guidance on preservation:

Historic England. 2016. Preserving Archaeological Remains: Decision-taking for Sites under Development. London: Historic England. https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/

We also refer you to the following publications :-

GPA 3 Setting of Heritage Assets https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

Planning and Archaeology https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/

Deposit Modelling https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/#:~:text=Deposit%20models%20use%20existing%20information,archaeological%20potential%20can%20be%20identified.

Yours sincerely

Tim Allen

Tim Allen MA FSA
Team Leader (Development Advice)

Midlands Region Historic England The Foundry, 82 Granville Street, Birmingham B1 2LH

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From: Vyrnwy to Frankton < vyrnwytofrankton@planninginspectorate.gov.uk >

Sent: 24 January 2024 11:14

To: Midlands ePlanning < e-midlands@HistoricEngland.org.uk >

Cc: Ramsden, Simor @HistoricEngland.org.uk>; Wormald, Luke @HistoricEngland.org.uk>

Subject: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Please see attached correspondence on the proposed Green GEN Vyrnwy Frankton Project.

Please note the deadline for consultation responses is **21 February 2024** and is a statutory requirement that cannot be extended.

Kind regards

Todd Brumwell



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DPC:76616c646f72



Kinnerley Parish Council

Parish Clerk: Ian Cruise-Taylor, c/o

Phone:

Email: kinnerleyparishcouncil@gmail.com Website: www.kinnerleyparishcouncil.org.uk

.....

Emma Cottam, Senior EIA Advisor Environmental Services Operations Group 3 Temple Quay House 2 The Square Bristol, BS1 6PN

Your ref: EN020035-000009

By email to: vyrnwytofrankton@planninginspectorate.gov.uk

21 February 2024

Dear Ms Cottam

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

Introduction

- 1. Kinnerley Parish Council is now responding formally to your letter to us dated 24 January 2024, inviting us to comment on the above Scoping consultation.
- 2. We support the inclusion within the eventual EIA of the matters included in Chapters 7 to 17, and have the following additional comments. We are not responding in detail to every one of the series of Questions to Consultees numbered 6 to 17 in the Scoping Opinion.
- 3. However, we think that one of the matters proposed to be scoped out should be included in the EIA, for the reasons stated below.

Consultation process

4. We have already had email correspondence with you on 26 January about the timing of the consultation, in which your Todd Brumwell confirmed that "the 28 day period for a response to a scoping consultation is prescribed by Regulation 10(11) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and the Regulations do not allow for an extension to the stated period".

- 5. Kinnerley Parish Council is a small organisation with limited resources and relies on a very small number of people to deal with matters such as this response to the Scoping Consultation. The Parish Clerk cannot deal with these matters in the limited number of hours that the Parish Council can afford to pay him so the work must necessarily be done by volunteers in their spare time
- 6. We also repeat that the timing of the consultation has posed us difficulties in response, because the prescribed four-week period falls wholly outside the period between our last Full Parish Council meeting on 22 January 2024 and our next one on 26 February 2024 (our meetings are held on the fourth Monday of the month). We have therefore had to make special arrangements in order to produce this response. Other Town & Parish Councils may well be in a similar situation.
- 7. We recognise that, under Regulation 10(6) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, you need consult only the "consultation bodies", of which we are presumably one.
- 8. However, we are surprised that the wider public are not also consulted at this Scoping Request stage. The applicants did run a six-week, fully public, consultation from 6 September to 18 October 2023 and we had expected the results of that consultation to have been made widely available before the applicants began the formal planning process. That was the implication of the article below, from the Shropshire Star of 1 November 2023.

Green GEN Cymru, part of the Bute Energy group, has thanked communities for providing feedback in an initial round of consultation on the proposed Vyrnwy Frankton renewable energy network.

The consultation, which ran from

The consultation, which ran from September 6 to October 18, saw six well-attended consultation events and two online webinars.

People commented on the route identified for the overhead line through Powys and Shropshire, and the proposed location for a sub-station.

Bosses said following this round of public consultation, all feedback received will be carefully considered, along with assessments from environmental and technical surveys, ahead of the next round of public consultation – expected in

JOHN CORSER

john.corser@mnamedia.co.uk

the second half of 2024. Green GEN Vyrnwy Frankton is a proposed renewable energy network.

newable energy network.

It would link Bute Energy's proposed Llyn Lort Energy Park, which could generate energy in the Llanerfyl area, and other energy parks in the early assessment and feasibility stage, to the National Grid at a point near Lower Frankton in Shropshire.

ton in Shropshire.

The firm said the Welsh and UK Governments have set clear targets for more renewable energy, helping to stop the climate change that is threatening livelihoods, landscapes, and wildlife.

Gareth Williams, grid director

Gareth Williams, grid director at Bute Energy, said: "It has been good to speak to local people about our plans – and there's broad agreement that renewable energy has an important role to play in responding to the Climate Emergency.

"But we know that people have differing views on new infrastructure, and we are focused on causing the least disturbance to the environment and those who live, work and enjoy recreation close to our proposals.

"Over the next few months we will be reviewing feedback from local people, along with reports from environmental and technical surveys and use it to evolve the design and routing of the project, responding to the issues that have been raised.

"We anticipate that our next round of consultation will be in mid-2024, ahead of submitting an application for a Development Consent Order to the UK Government in 2025.

in 2025.

"We really appreciate local people taking the time to come and have their say on our initial proposals to connect clean, green energy to the National Grid."

Bosses said a community bene-

fit fund of £7,500 per megawatt of installed capacity a year for each Bute Energy Park that connects to the Green GEN Vyrnwy Frankton project will be set up.

This will be accessible for communities near the energy parks and communities along the route of Green GEN Vyrnwy Frankton.

It could mean a pot of up to £6 million a year that local organisations, charities, and community

groups can access.

The company is also working with local education, training, and employability providers to create inclusive employment pathways to enter the renewable energy indus-

try.

This includes work with local colleges to enhance the provision of green skill development programmes available locally, creating green skills centres of excellence across Wales, enabling a pipeline of talent for the renewable energy industry.

9. We understand that a brief summary consultation report on the above consultation has recently been published (Phase One Consultation Feedback Summary Winter 2023/24), and

although it has been posted on the Documents page, there is no entry about it on the website's news page at News - Green GEN Cymru consultation (greengenvyrnwyfrankton.com), the latest entry on which is as long ago as 31 October 2023.

- 10. The summary report includes the following statement:
 - We will also publish a consultation report which will contain a full breakdown of all the feedback we've received, and how each of these comments is being taken into account. This will be available at our next consultation in 2024.
- 11. This current Scoping Consultation does have the appearance of being that "next consultation in 2024", so we are puzzled why this promised full Phase One consultation summary has not been made available for the public to comment on before the applicants embarked upon this current formal Planning Act 2008 and EIA Regulations process.
- 12. We did not formally respond to the consultation from 6 September to 18 October 2023 because the preferred route corridor fell outside our parish boundary and there was no indication at the consultation that the proposals would directly affect our parish.
- 13. However, the information now before you is different from that presented to the public at that previous consultation. Firstly, the corridor has been significantly widened and, secondly, it is now made clear that the effects of the pylon line will stretch well into our parish.
- 14. We would therefore have expected some further publicity to notify the general public of these changed effects of the proposal. However, we understand that there has been no notice given in local papers, for instance the Shropshire Star, about this Scoping request.
- 15. For the avoidance of doubt, we emphasise that, although we may be a statutory consultee, and although we are the local Parish Council with some contact with parishioners, we do not have the ability to consult widely, or in a timely manner, with our parishioners. We should therefore not be considered to be a substitute for direct consultation with members of the public in our parish likely to be affected by the proposals. These members of the public will include those living at the residential receptors within the LVIA Study Area as reproduced at Appendix 5 below, but may also include others.
- 16. The project comprises an overhead line (OHL) supported on 'L7' steel lattice towers as well as a collector substation and a cable sealing end compound located in close proximity to the

Llyn Lort Energy Park. The eventual EIA should describe exactly the complete physical characteristics and locations of each element, including all pylons, sealing end compounds, and connections into the existing network. Unless exact details are given people cannot get an idea of the impact of the proposals upon them or the environment. The exact characteristics of these elements should therefore be subject to full consultation before publication of the EIA.

Scoping Corridor

- 17. The information presented to the public in the consultation from 6 September to 18 October 2023 suggested that the applicant had arrived at a relatively narrow preferred route corridor as shown below at Appendix 1, for Section 5, the northernmost section that skirted our parish. That preferred route corridor was about 200m wide.
- 18. Appendix 2 shows the Scoping Corridor that is now presented to you. In that northern section, it is around 2km wide where it touches our parish, and over 3km wide in some other parts.
- 19. Paragraph 2.13 of the Scoping Report states that "to ensure flexibility for the Project to develop following further planned stages of consultation, Green GEN Cymru considers that it is appropriate to seek a Scoping Opinion for the Project within a wider area than the preferred route that was subject to consultation . . . to allow Green GEN Cymru to consider alternative routes . . . that could deliver reduced impacts".
- 20. That might be acceptable were the Scoping Corridor a few metres or so wider than the "preferred corridor" presented to the public. However, to present a Scoping Corridor that is now, in places, more than ten times wider seems to fly in the face of the supposed aim of public consultation. To submit such a wide Scoping Corridor seems to be premature without first having held at least one more round of consultation, and without also having published the full results of that first consultation from 6 September to 18 October 2023.
- 21. This issue does not seem to be covered in the series of Questions to Consultees numbered 6 to 17 in the Scoping Opinion.

Landscape and Visual Amenity (Chapter 7)

22. Paragraph 2.8 of the Scoping Report assumes that the main effects of an overhead line are landscape and visual. With that in mind, a 3km buffer has been applied to the Scoping Corridor, as reproduced in Appendix 3 below.

- 23. However, only 17 preliminary viewpoints are suggested along the 50km Scoping Corridor i.e. about one only every 3km, as reproduced in Appendix 4 below for the northern half of the Study Area encompassing Kinnerley Parish.
- 24. We therefore suggest that there should be many more viewpoints, and that they should include:
 - i) views from prominent residences in the village of Pant; at the consultations last autumn, residents there were particularly concerned about the closeness of the overhead line to them; and
 - ii) views from roads and rights of way that cross the proposed overhead line (OHL) route.

Traffic and Transport (Chapter 11)

- 25. Paragraph 6.19 of the Scoping Report states that steel for use in towers will equate to approximately 1,000 2,000 tonnes and concrete for use in tower construction will equate to approximately 2,000 4,000 tonnes.
- 26. Paragraph 3.3 states that the average span length between towers is approximately 250m. Paragraph 1.28 states that the Project is approximately 50km in length. With these parameters it should be possible to determine fairly accurately how many towers are required and therefore to predict more accurately the requirement for steel and concrete than the rather vague ranges noted above.
- 27. The realistic environmental impacts of traffic and transport during construction can clearly be more accurately assessed if the quantities of steel, concrete and materials are known fairly accurately. It would therefore be better if the EIA is delayed until such more accurate assessments are made.
- 28. Local roads and narrow country lanes are subject to large modern agricultural traffic, particularly at seasonal times of cultivation work; of silage, hay, corn and maize harvests; and of muck carting. Traffic surveys carried out over only a short period of time are unlikely to capture these traffic flows and may therefore not be properly representative.
- 29. The environmental effects of Traffic and Transport, and construction generally, should include the effects of any possible Underground Cable Construction, or of the relatively new technology of Cable Trenching if that is to be deployed anywhere. Again, the possibility of

Underground Cable Construction or Cable Trenching would have been raised during the consultation from 6 September to 18 October 2023; it would facilitate the assessment of environmental impacts if some preliminary results from that consultation had been made available before seeking a Scoping opinion.

Water Resources (Chapter 13) and flooding

- 30. Flooding and the drainage of flood waters are major concerns for many people living in or near the proposed route corridor, which passes directly along several river floodplains. In this matter, there should be liaison with the relevant Internal Drainage Boards, who we presume are also statutory consultees.
- 31. Any significant structure placed in the floodplain will affect water flows, either rising or falling, or both. The EIA should identify the individual effects of each construction that is proposed to be placed in the floodplain, which may have particular effects on particular properties or locations. Those effects should also be assessed cumulatively, including the cumulative effects of increased run-off from proposed and existing windfarms in the upstream catchment area.
- 32. There are known aquifers near the area of Kinnerley Parish through which the route corridor passes. The eventual EIA should identify these and the effect of the proposals upon them.

Cumulative Effects (Chapter 17)

- 33. The Green GEN Vyrnwy Frankton Project for which the Scoping opinion, and ultimately planning permission, is sought appears to start with (1) approximately 5km of underground cable through the proposed Llyn Lort Energy Park, then (2) a Collector Substation, then (3) the Cable Sealing End Compound and then (4) the approximately 50 km of new 132kV overhead electricity transmission line supported on L7 steel towers with an average height of 27m (as well as ancillary works).
- 34. It does not appear to include either the Llyn Lort Energy Park itself, or the substation at the Shropshire end of the Scoping Corridor, even though the three elements are entirely dependent on each other for the overall aim of delivering renewable electricity to the National Grid.
- 35. Nevertheless, paragraph 1.31 of the Scoping Report states that "the substation at the Shropshire end of the Scoping Corridor will be delivered by National Grid and therefore doesn't form part of the Project, however this will be included in the cumulative assessment".

- 36. We welcome the inclusion of this substation in the cumulative assessment. However, for logical consistency, the Llyn Lort Energy Park itself should also be included in the cumulative assessment.
- 37. Further, because the three elements (wind farm, OHL and substation) are entirely dependent on each other for the overall aim of delivering renewable electricity to the National Grid and are therefore one united project, the environmental effects of all three should be Scoped in and included in the eventual EIA.

Matters which should not be scoped out

- 38. Table 6.1 proposes that Climate Change should be scoped out. The justification for this is stated at paragraph 6.23 of the Scoping Report, namely:
 - On the basis that the Project is required to facilitate the generation of renewable energy to 'achieve a science-based 1.5°C aligned transition to net zero' by facilitating the contribution of 685MW of renewable energy towards the targets, significant adverse effects in relation to greenhouse gas emissions will not occur. Therefore effects associated with greenhouse gases during construction and operation are proposed to be scoped out.
- 39. The whole rationale for the combined project (wind farm, OHL and substation) is to help the UK to achieve its climate change targets, as set out in the Needs Case on page 2 of the Scoping Report. That is going to be its chief environmental effect.
- 40. It is therefore not appropriate for that chief environmental effect of the proposal to be scoped out from the EIA. It is not enough simply to claim, without detailed supporting evidence, that 'significant adverse effects in relation to greenhouse gas emissions will not occur'. Whether or not the project is of national significance, its environmental effects in relation to climate change and greenhouse gas emissions should be itemised and quantified in the EIA.
- 41. This is of double significance because the applicant is splitting out the three elements of the combined project, namely the wind farm, the OHL and the substation. It is presumably only because of the effects of the wind farm that the combined project is claimed not to have significant adverse effects in relation to greenhouse gas emissions. The OHL and the substation individually may well have such significant adverse effects.

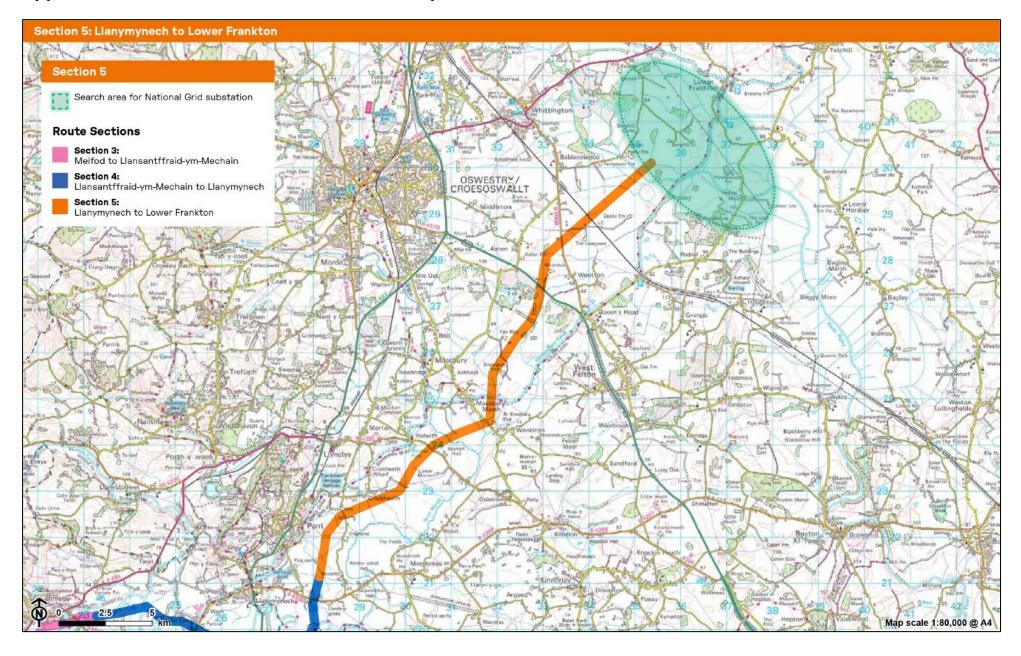
- 42. As the scoping request is essentially for the OHL only then the EIA should include its effects on climate change and greenhouse gas emissions.
- 43. Furthermore, if the EIA is truly to assess the full environmental effects of the proposal, then its scope should not be limited just to the study area. It should also include the environmental effects, both nationally and internationally, of producing all materials to be used in the project.

Yours faithfully,

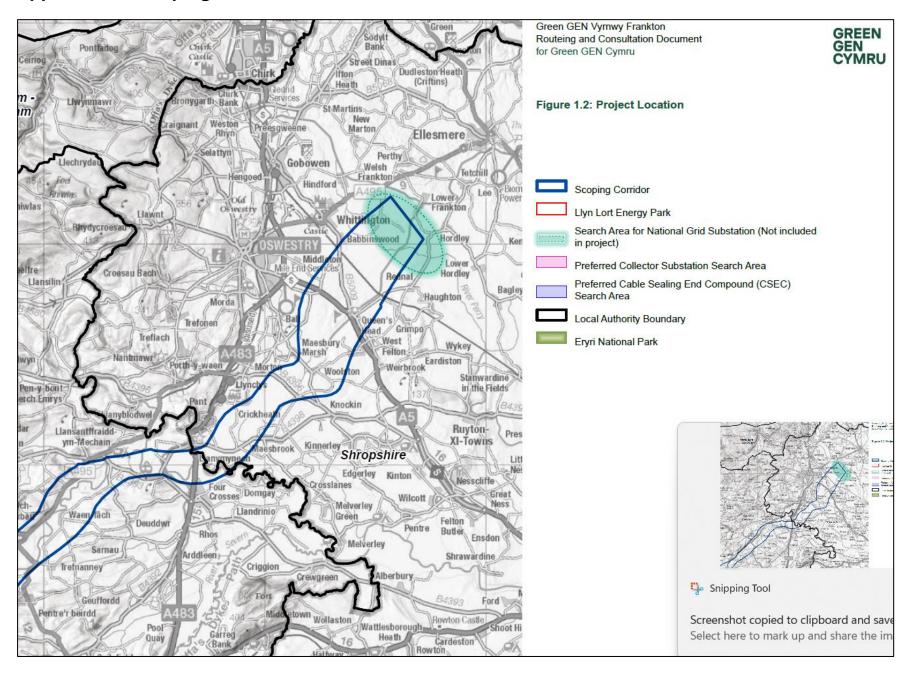
I.F. Cruíse-Taylor

Parish Clerk Kinnerley Parish Council

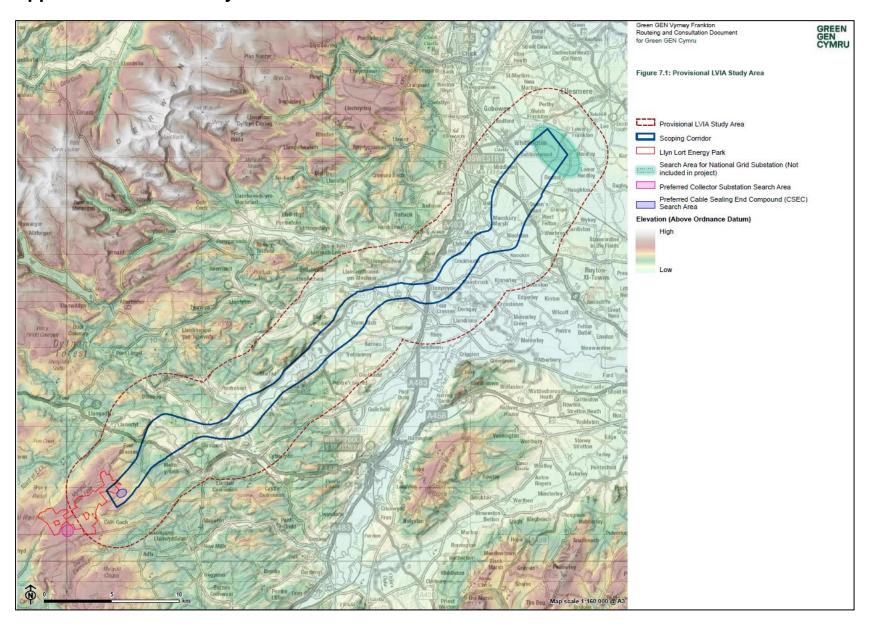
Appendix 1 – Preferred route corridor as in September/October 2023 consultation



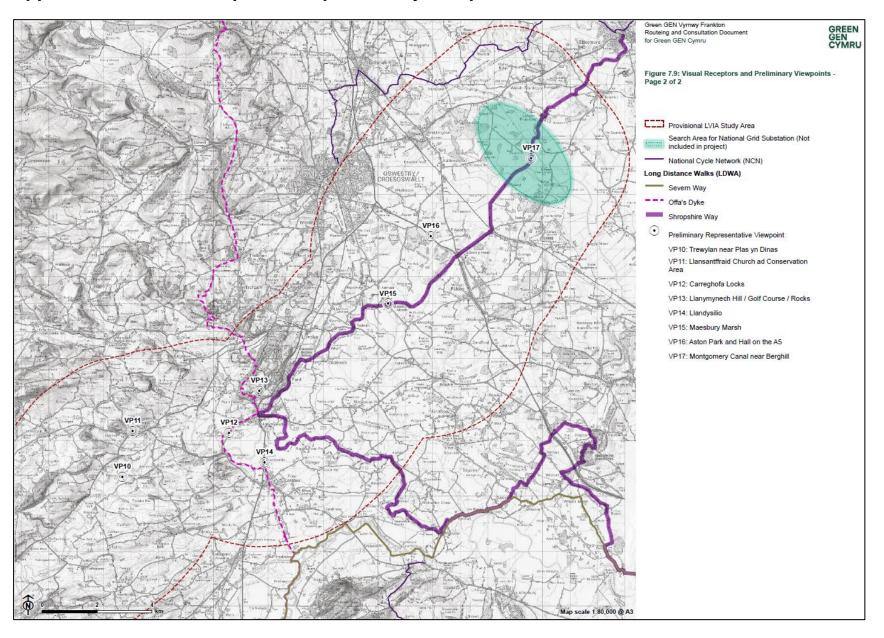
Appendix 2 – Scoping corridor



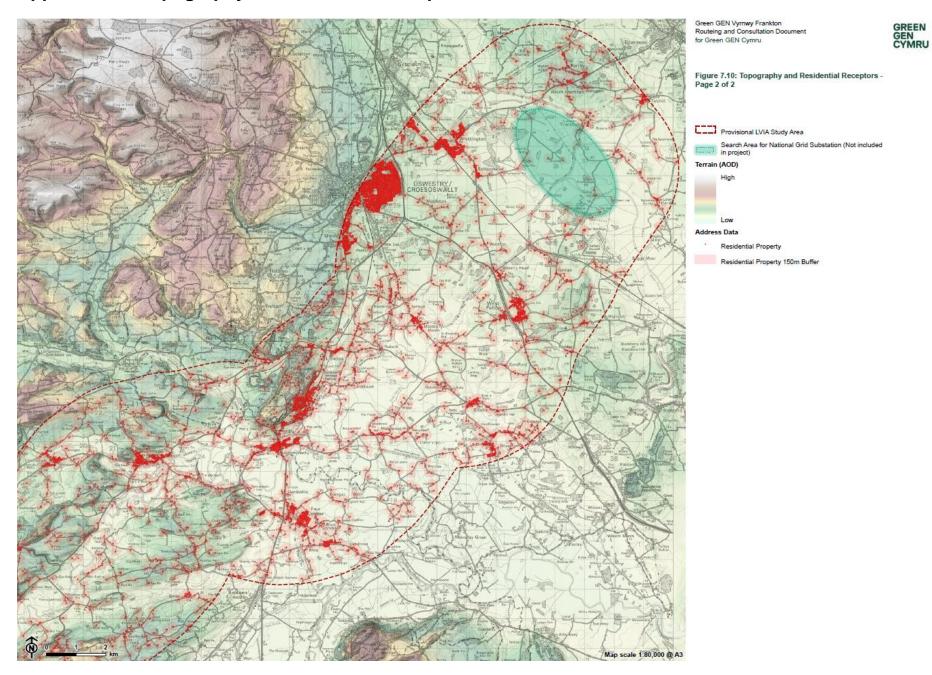
Appendix 3 – LVIA Study area



Appendix 4 – Visual receptors and preliminary viewpoints



Appendix 5 – Topography and residential receptors



From: Knockin Parish Council
To: Vyrnwy to Frankton

Subject: Re: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 21 February 2024 20:04:00

Attachments: <u>image001.png</u>

image004.png image005.png image006.png image003.png

You don't often get email from knockinpc@gmail.com. Learn why this is important

Knockin Parish Council wishes to echo the views as laid out in the response from Llanymynech and Pant Parish Council on 16th February.

Amy Jones Parish Clerk

Knockin Parish Council

T:

E: knockinpc@gmail.com

Knockin Parish Council is collecting / managing your personal data under the EU General Data Protection Regulations 2018 (2016/679). Your information will only be processed by the Parish Council and will not be shared with any third parties.

On Wed, Jan 24, 2024 at 11:53 AM Vyrnwy to Frankton vyrnwytofrankton@planninginspectorate.gov.uk wrote:

Dear Sir/Madam,

We are contacting you at this time in relation to the Green GEN Vyrnwy Frankton Project which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the pre-application stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant 'consultation bodies' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own

consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is 21 February 2024 and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

- Overview of the NSIP Planning Process
- Information on the stages, services and participation in NSIP planning
- FAQs relating to the Scoping process
- Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment (HRA), etc.
- Information on legislation, guidance, and National Policy Statements (NPSs)

The relevant legal framework and regulations include:

- The Planning Act 2008
- The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017)
- Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Annwyl Syr/Fadam,

Rydym yn cysylltu â chi yn awr ynglŷn â Green GEN Vyrnwy Frankton Project sy'n Brosiect Seilwaith o Arwyddocâd Cenedlaethol (NSIP). Diffinnir NSIPau yn Rhan 3, Rheoliad 14 Deddf Cynllunio 2008, ac maen nhw'n brosiectau o fathau penodol, dros faint penodol, y mae'r Llywodraeth o'r farn eu bod mor fawr a phwysig yn genedlaethol fel bod angen i ganiatâd i'w hadeiladu gael ei roi ar lefel genedlaethol, gan Ysgrifennydd Gwladol cyfrifol. Mae crynodeb o'r broses gynllunio NSIP ar gael yn y rhestr o ddolenni ar waelod y dudalen hon. Mae'r prosiect hwn ar y cam cyn-ymgeisio ar hyn o bryd.

Er mwyn bodloni gofynion Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) (EIA) 2017 ("y Rheoliadau EIA"), mae'n ofynnol i NSIPau sy'n debygol o gael effaith arwyddocaol ar yr amgylchedd gynnal EIA a darparu Datganiad Amgylcheddol i gyd-fynd â'r cais. Bydd Datganiad Amgylcheddol yn amlinellu effeithiau posibl ac effeithiau arwyddocaol tebygol y Datblygiad Arfaethedig ar yr amgylchedd. Mae Atodlen 4 y Rheoliadau EIA yn amlinellu gwybodaeth gyffredinol i'w chynnwys mewn Datganiad Amgylcheddol. Mae rhagor o fanylion am ddogfennau Datganiad Amgylcheddol a'r broses EIA yn y dolenni ar waelod y dudalen hon.

Er mwyn llywio cwmpas y wybodaeth sydd i'w darparu yn y Datganiad Amgylcheddol a faint o fanylion i'w cynnwys, mae'r Ymgeisydd wedi gofyn am Farn Gwmpasu gan yr Arolygiaeth Gynllunio, ar ran yr Ysgrifennydd Gwladol o dan Reoliad 10 y Rheoliadau EIA.

Cyn mabwysiadu Barn Gwmpasu, mae'n rhaid i'r Arolygiaeth ymgynghori â'r 'cyrff ymgynghori' perthnasol a ddiffinnir yn Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009 (gweler y ddolen isod). Rydych wedi cael eich nodi'n gorff ymgynghori ar gyfer y prosiect hwn; gweler yr ohebiaeth atodedig. Mae Awdurdodau Cynllunio Lleol a Chynghorau Plwyf/Tref yn cyflawni rôl bwysig yn y broses gynllunio trwy ddarparu gwybodaeth benodol am yr ardal a chynrychioli cymunedau lleol. Mae'n rhaid i'r Ymgeisydd ystyried sylwadau a wnaed yn y Farn Gwmpasu oherwydd bod rhaid i'r Datganiad Amgylcheddol gael ei seilio ar y Farn Gwmpasu a fabwysiadwyd yn fwyaf diweddar. Felly, mae eich sylwadau ar y cam hwn yn werthfawr wrth ddylanwadu ar gwmpas y Datganiad Amgylcheddol trwy adolygu ymagwedd yr Ymgeisydd at EIA, fel yr amlinellir yn ei Adroddiad Cwmpasu. Sylwch fod yr ymgynghoriad hwn yn ymwneud â'r Broses Gwmpasu EIA yn unig. Fe'ch sicrheir y bydd cyfleoedd pellach i chi ymgysylltu â'r prosiect a rhoi

safbwyntiau arno yn fwy cyffredinol, gan gynnwys trwy ymgynghoriad yr Ymgeisydd ei hun. Mae gan ymgeiswyr ddyletswydd i gynnal ymgynghoriad statudol ac mae'n ofynnol iddynt ystyried yr holl ymatebion i'w hymgynghoriad statudol.

Sylwch mai'r dyddiad cau ar gyfer ymatebion ymgynghori yw 21 Chwefror 2024. Dyddiad cau statudol yw hwn na ellir ei ymestyn. Bydd ymatebion a gyflwynir cyn y dyddiad cau yn cael eu hystyried, a'u cyhoeddi ar ddiwedd y Farn Gwmpasu, gan yr Arolygiaeth Gynllunio.

I gael rhagor o wybodaeth am y broses gynllunio NSIP, cliciwch ar y dolenni isod:

- Trosolwg o'r Broses Gynllunio NSIP
- Gwybodaeth am gamau, gwasanaethau a chyfranogi mewn cynllunio NSIP
- Cwestiynau Cyffredin yn ymwneud â'r Broses Gwmpasu
- Gwybodaeth yn ymwneud â materion penodol o fewn y broses gynllunio, e.e. rôl awdurdodau lleol, adroddiadau ar yr effaith leol, y Broses EIA, Asesiad Rheoliadau Cynefinoedd (HRA), ac ati
- Gwybodaeth am ddeddfwriaeth, canllawiau, a Datganiadau Polisi Cenedlaethol (NPSau)

Mae'r fframwaith cyfreithiol a'r rheoliadau perthnasol yn cynnwys:

- Deddf Cynllunio 2008
- Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017
- Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009

Os oes gennych unrhyw gwestiynau ynglŷn ag unrhyw ran o'r wybodaeth hon, mae croeso i chi gysylltu â ni trwy ymateb i'r cyfeiriad e-bost hwn.

Kind regards,

Todd Brumwell

Todd Brumwell | EIA Advisor

The Planning Inspectorate

T 0303 444 5348

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DPC:76616c646f72		
	?	

From: carol davies
To: Vyrnwy to Frankton

Subject: Re: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 11 February 2024 18:43:31

Attachments: <u>image001.png</u>

image003.png image004.png image005.png image006.png

Importance: High

Many thanks for your letter

Llandysilio Community Council represents the village and of Four crosses and surrounding

The Community Council would like to request that the scoping study includes the impact of adding pylon bases into a flood plain and how this will be mitigated.

The Community Council would also like to receive a form to register as an Interested Party as an organisation

regards

Carol Davies

Clerk to Llandysilio Community Council

From: Vyrnwy to Frankton

Sent: Wednesday, January 24, 2024 11:53 AM

Subject: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and

Consultation

Dear Sir/Madam,

We are contacting you at this time in relation to the Green GEN Vyrnwy Frankton Project which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the preapplication stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

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process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is 21 February 2024 and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

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- Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment (HRA), etc.
- Information on legislation, guidance, and National Policy Statements (NPSs) The relevant legal framework and regulations include:
 - The Planning Act 2008
 - The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017)
 - Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Annwyl Syr/Fadam,

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Sylwch mai'r dyddiad cau ar gyfer ymatebion ymgynghori yw 21 Chwefror 2024. Dyddiad cau statudol yw hwn na ellir ei ymestyn. Bydd ymatebion a gyflwynir cyn y dyddiad cau yn cael eu hystyried, a'u cyhoeddi ar ddiwedd y Farn Gwmpasu, gan yr Arolygiaeth Gynllunio.

I gael rhagor o wybodaeth am y broses gynllunio NSIP, cliciwch ar y dolenni isod:

- Trosolwa o'r Broses Gynllunio NSIP
- Gwybodaeth am gamau, gwasanaethau a chyfranogi mewn cynllunio NSIP
- Cwestiynau Cyffredin yn ymwneud â'r Broses Gwmpasu
- Gwybodaeth yn ymwneud â materion penodol o fewn y broses gynllunio, e.e. rôl awdurdodau lleol, adroddiadau ar yr effaith leol, y Broses EIA, Asesiad Rheoliadau Cynefinoedd (HRA), ac ati
- Gwybodaeth am ddeddfwriaeth, canllawiau, a Datganiadau Polisi Cenedlaethol (NPSau)

Mae'r fframwaith cyfreithiol a'r rheoliadau perthnasol yn cynnwys:

- Deddf Cynllunio 2008
- Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017
- Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009

Os oes gennych unrhyw gwestiynau ynglŷn ag unrhyw ran o'r wybodaeth hon, mae croeso i chi gysylltu â ni trwy ymateb i'r cyfeiriad e-bost hwn.

Kind regards,

Todd Brumwell



Ensuring fairness, openness and impartiality across all our services

From: ROBERT ROBINSON
To: Vyrnwy to Frankton

Subject: Welsh Government – 132kv transmission line - Vyrnwy to Frankton

Date: 03 February 2024 08:40:52

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Dear Sir

Please set the consultation response from Llanfair Caereinion Town Council to the above as follows:

Consultation - Welsh Government - 132kv transmission line - Vyrnwy to Frankton

The meeting considered the paper on the consultation for the 132kv transmission line between Cefn Coch and Frankton using metal pylons.

The meeting **agreed** to respond to the consultation as follows:

- i. The meeting accepted that the transmission line is required.
- ii. There should be options for the type of pylons used and in particular the 'T' shaped pylons should be considered.
- iii. There should be one and not multiple transmission lines along the route shown on the drawings.
- iv. An community benefit from the development should include consideration of aiding the re-opening of the Cwm Golau road to adoptable standard to help alleviate lorry traffic through Llanfair Caereinion Town Centre.

Thank you.

Regards.

Robert

R A Robinson MBE FRICS FSLCC

Town Clerk

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LLANSANTFFRAID AND DEYTHEUR COMMUNITY COUNCIL

C/O AROSFA

LLANSANTFFRAID,

POWYS,

SY22 6AU

llansantdcc@gmail.com

21/2/24

Environmental Services

Operations Group 3

Temple Quay House

2 The Square

Bristol, BS1 6PN

Your ref: EN020035-000009

Dear Sir / Madam

We write to you regarding the request for information that we consider needs to be provided within the Environmental Statement for the proposed Green GEN energy pylon line from Mid Wales to Frankton in England.

Firstly, we must point out that we have not been given sufficient time to fully consider a response to this request as the community council has a monthly meeting and this will take place after the deadline has expired.

However, the council is fully aware of the proposals to run an overhead pylon line through the community. In the autumn, the council held an open meeting where members of the public were invited to express their opinions. **None of the community present supported the proposal.**

Items we need to see within the ES would be a minimum of as below. However, due to this short notice time there may well be more items that we have not considered / requested that are required. We suggest that we are informed by Green GEN energy that they propose all the Impacts that they foresee and we will consider whether we wish to add more that they have missed out.

Prior to the list we would like to point out the following:

- Whilst we appreciate and agree with the need for renewable energy, the publicised ethos of the proposal is to make Wales self sufficient in green energy. This is all very well apart from the fact that the proposal will export the energy produced into England.
- If there is an insistence of exporting power to England, this should be done using an underground method. Although this will still result in significant damage to the environment.

• During the previous application for a pylon line, approximately 10 years ago, an externally monitored consultation was carried within our local community. 1000 households were surveyed and 100% were opposed to the pylon line.

Minimum list of requirements within a proposed ES that have been expressed to council from our local community during winter 2024.

- Affect on health from high energy overhead cables.
- Serious visual damage to landscape.
- Economic effect on multiple businesses that provide holiday accommodation, lodges and caravans, most of which are directly affected by the proposed routes.
 People stay in this area for the beauty of the countryside and to get away from city life.
- Affect on underground water systems a significant employer is a major bottled spring water company who say their business is in danger from the proposals.
- Affect on significant ancient historic monuments within the proposed routes.
- Irreversible damage to wildlife; otters, newts, bats, red kites, pine martin are all known in this area.
- Affect of mental stress on local communities from the added burden of constant meetings etc

Yours sincerely,

R. Dawson,

Chairman, Llansantffraid & Deytheur Community Council.

cc. Mrs. A Davies, Clerk to Council. Address above.

From: Councillor Gwynfor Thomas
To: Vyrnwy to Frankton

Subject: Report

Date: 21 February 2024 09:11:35

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Learn why this is important

I write to inform you that the report has met with little support within the ward of Llansantffraid.

It is felt that there is no consistency in the report surrounding environmental impact: different parts of the line are different in their approach to this . Any attempt to resolve has been met with obstruction from the developers.

The approach to communication mitt benefit is confusing and is based on lies and not fact. Gwynfor Thomas

Sent from Outlook for iOS

Mae'r e bost hwn ac unrhyw atodiad iddo yn gyfrinachol ac fe'i bwriedir ar gyfer y sawl a enwir arno yn unig. Gall gynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd trwy gamgymeriad ni ellwch ei gopio, ei ddosbarthu na'i ddangos i unrhyw un arall a dylech gysylltu gyda Cyngor Sir Powys ar unwaith. Mae unrhyw gynnwys nad yw'n ymwneud gyda busnes swyddogol Cyngor Sir Powys yn bersonol i'r awdur ac nid yw'n awdurdodedig gan y Cyngor.

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Mae'r e bost hwn ac unrhyw atodiad iddo yn gyfrinachol ac fe'i bwriedir ar gyfer y sawl a enwir arno yn unig. Gall gynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd trwy gamgymeriad ni ellwch ei gopio, ei ddosbarthu na'i ddangos i unrhyw un arall a dylech gysylltu gyda Cyngor Sir Powys ar unwaith. Mae unrhyw gynnwys nad yw'n ymwneud gyda busnes swyddogol Cyngor Sir Powys yn bersonol i'r awdur ac nid yw'n awdurdodedig gan y Cyngor.

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Re: Green Gen Vyrnwy Frankton Connection Application Scoping Opinion Consultation Response from Llanymynech and Pant Parish Council

Necessity for this Project

The applicant states in their own literature that this project is about **Welsh power for Welsh people** so why is this even coming into England at all?

We have not seen anything from the applicant that properly looks at alternatives to pylons, and they rule out undergrounding too easily. They also have not looked at the "whole grid", just their requirement to get power out of Wales, not get any power into Wales or distributed along the way. This contravenes the Electricity Act 1989 as it's not "efficient and effective".

Surely the better approach would be to join up all the new wind farms and join the grid in North and South Wales. An even better approach would be to build a connection to the sea around Aberystwyth and have a subsea connection to the national Grid, again in North or South Wales.

The applicant has also acknowledged that the current route was designed in office with no attempt at a survey, site visit or real look at the impact on homes and businesses - the old National Grid route was, while still undesirable, better researched, with significantly less impact.

The previous attempt by National Grid to build a pylon run down the Vyrnwy Valley and through North Shropshire failed. Based on pylons, and with large stretches under-grounded, it was eventually rejected and did not proceed, even though it was better researched, and more account taken of the actual route. The environmental impact and the effect on rural lives and businesses, not to mention the public outcry at the time, caused the project to be discontinued.

Why should the applicant have a second go at something that failed previously? They have failed to demonstrate a need now and precedent suggests it should, therefore, be rejected this time. Rushed through with undue haste, not well researched, with insufficient account taken of the impact on the environment, people and businesses, not to mention its likely gateway effect to further inappropriate development. How can the despoliation of so much of our precious rural landscape ever be justified when alternatives exist.

Risk of a Gateway Project

It is clear that the capacity of the route will only handle the applicant's own proposed wind farms. This does not make it a project of national significance but **a private line** as the National Grid will have no opportunity to use it. What happens when the current route **reaches capacity** if more capacity is needed? More wind farms are already planned in Wales. It is obvious that once the pylons are approved and the route established bigger, more pylons would be approved with little chance to prevent this.

Alternatives Dismissed Out of Hand

When questioned the applicant has dismissed any notion of taking the scheme **underground**. Digging is perfectly feasible, and is the default option in most of Europe, and as a result has significantly come down in price. Why will the applicant not consider it to protect fragile countryside and environments and people's lives and livelihoods - no impact assessment has been done on the latter either and the recent 'consultation' ignored many of these concerns.

Tunnels would futureproof capacity, upgrades and provide facilities for other utilities. National Grid has the equipment, but this requires a much more joined up and mature approach to energy infrastructure in the UK, and this is lacking. Tunnels and digging can be dug underneath field drains and rivers, alleviating farmers' concerns, and not so long ago a gas pipeline was laid across Wales from Milford Haven, entirely underground, and you cannot see where it was placed now.

A second option for connectivity in Wales at Trawsfynedd. It has been confirmed that all the National Grid infrastructure is still in place. The applicant has refused to discuss it as an option citing National Park restrictions. This ignores the fact that digging under National Parks is a matter of fact in other areas, see New Forest, Lake District etc. Therefore, if Scottish Power can dig cables under Barmouth Estuary almost any could be possible This is achievable if there is the will. For example, Denmark will be undergrounding all their cable infrastructure by 2040.

See Denmark Goes Underground

See Snowdonia Project

Health Implications

Health and safety is a key consideration if these things are so close to homes. There has been much research on this, particularly in Europe, with disturbing findings on the implications for the health and wellbeing of people living near power lines. It is not acceptable to expose anyone to these risks.

Helen Morgan MP recently visited the area and met with residents. She said, "why should rural communities have to be forced to accept things that would not be tolerated in more urban environments, we are not second-class citizens".

It should also be acknowledged that there is a significant mental health impact of this whole process on residents and the long-term anxiety that living with noise and fear of induced illness will engender.

Health issues associated with Power Transmission are well known. Here is some supporting evidence from a British University Professor illustrating this.







H H Wills Physics Laboratory Royal Fort, Tyndall Avenue, Bristol, BS8 1TL

Tel: (0117) 9260353 Fax: (0117) 9251723

E-mail:

Denis L Henshaw Professor of Physics

TO WHOM IT MAY CONCERN

May 2010

Dear Sir

Adverse health effects of exposure to power frequency electric and magnetic fields (EMFs)

I am writing in response to enquiries I have received on the above issue.

It is indeed unfortunate that the question of health effects of exposure to EMFs well below current exposure guidelines has not received the highest level of scientific or public health attention that it deserves. The evidence of adverse health effects from EMFs associated with the electricity supply, in particular magnetic field (MF) exposures around or below 1 microtesla (μT), is huge and it is quite clear across a range of outcomes. We have long passed the stage where application of the Precautionary Principle and of appropriate legislation against undue exposure is warranted, including a substantial lowering of permitted MF exposure limits, currently 100 μT . In the case of high voltage overhead powerlines, these should not be built close to houses or farms where cattle and poultry are housed.

The available evidence on adverse health effects of MF exposure speaks for itself. No longer can we talk of differing opinions of whether or not there are such adverse health effects: the question is not about what people think, rather it is about what the evidence says.

Official review bodies are usually constrained by their Terms of Reference and have not been in a position to access the bulk of our scientific knowledge of MF interactions with biological systems. As I will explain below, I estimate that such bodies have at most addressed only 10% of the available evidence/data.

I will deal in turn with some aspects of the available scientific evidence/data.

1. <u>Epidemiological evidence</u>

The epidemiological evidence of adverse health effects from EMFs from human population studies has emerged continuously in recent years and it continues to do so. Particular emphasis has been placed on MF exposures, although electric field, EF effects continue to be researched. It may be useful to consider what recent official reports have said concerning MF health effect in particular – see summary table attached.

Internationally, the first major report of note was the US NIEHS report of 1999 (see list of acronyms below). This concluded that both adult and childhood leukaemia was associated with EMF exposure. However, the 2002 IARC report (part of WHO) without apparent reference to the NIEHS

conclusions, concluded that childhood leukaemia was the only cancer associated with EMF (note that IARC is only concerned with non-cancer health outcomes). However, the California Department of Health Sciences report, also published in 2002 concluded that increased risk of five health outcomes was associated with MF exposures: (i) childhood leukaemia; (ii) adult leukaemia; (iii) adult brain cancer; (iv) amyotrophic lateral sclerosis, ALS (or motor neurone disease) and (v) miscarriage. More recently the EU SCENIHR report has associated childhood leukaemia and Alzheimer's disease to MF exposures. The 2007 WHO EHC Report appears to prevaricate on a range of health outcomes, admitting to the existence of evidence but saying simply that this is 'not as strong' as for childhood leukaemia. It is noteworthy that the various reported adverse health effects are associated with average MF exposures around or below 1 μ T. In the specific case of childhood leukaemia, a doubling of risk is seen with average exposures above 0.4 μ T.

The 2002 IARC and California Reports are now a little historic, but their findings have set the trend of perceived MF health effects in recent years. Given that these two reports were published at about the same time, a number of commentators have asked why two major reports using presumably the same available data came to quite different conclusions with respect to the many studies of adult leukaemia and adult brain cancer. This led my colleague Professor Mike O'Carroll and me to study what was said in both reports and to publish our findings in a learned peer-reviewed journal (O'Carroll & Henshaw 2007). We focused on adult leukaemia and adult brain cancer. We found that whereas the California report had looked at each individual study and at the overall findings of the studies in aggregate, the IARC report had made no attempt to look at the aggregate data. This was strange because IARC had listed in tables the findings from 33 studies of adult leukaemia and 43 studies of adult brain cancer. It was quite clear from inspection of these tables that there was a clear dominance of studies reporting a positive association with MF exposure. In the case of adult leukaemia, the association was, if anything, stronger than that for childhood leukaemia. In O'Carroll & Henshaw we concluded: "IARC shows no evidence of considering the aggregation of results other than subjectively. It considered individual studies but this led to a tendency to fragment and dismiss evidence that is intrinsically highly significant".

Naturally, I am critical of the 2002 IARC report for not carrying out a rather basic analysis of the overall data. However, this tendency has been repeated in later WHO Reports and by the UK NRPB (now subsumed into the HPA). In fact, these later reports fail to cite or in anyway discuss the conclusions of the California Report. I have to say that this is simply bad science and indeed it is unprofessional. Were any of these reports submitted for publication to a good scientific journal, failure to pick up these failures of citation and basic analysis would be picked up by the blind peerreview system and the reports would not be published. Instead, sadly, they enjoy a rather false sense of respectability. I am bound to say that Governments and Power Companies are being poorly advised if they seek to reply solely on advice from these sources.

Notwithstanding this situation, as mentioned above, the February 2009 update of the EU SCENIHR report has added Alzheimer's disease as associated with MF exposures, based on recent studies that were not available to the earlier review bodies. Alzheimer's disease is highly prevalent in the aging population and of considerable public health significance. Of special note is the 1.5 to 2-fold increase in risk specifically seen near powerlines in Switzerland (Huss *et al.* 2008).

2. Magnetic fields and living systems

I now expand on my above comment that official review bodies have accessed at most only 10% of the relevant scientific data. The areas where MF interactions with living systems have been extensively discussed are:

- 1. The known ability of birds and other animals to detect tiny changes in the Earth's magnetic field (the Geomagnetic or GM) for the purposes of navigation.
 - 2. The ability of plants to sense magnetic fields including power frequency AC fields.

- 3. Health effects arising from fluctuations in GM fields
- 4. The use of magnetic fields, including levels below the ICNIRP limit for medical treatment in wound & bone healing.

I will refer below to the 2008 Bioinitiative Report, but here is an extract of what it says about the use of MFs for medical treatment:

"Another Way of Looking at EMFs: Therapeutic Uses

Many people are surprised to learn that certain kinds of EMFs treatments actually can heal. These are medical treatments that use EMFs in specific ways to help in healing bone fractures, to heal wounds to the skin and underlying tissues, to reduce pain and swelling, and for other postsurgical needs. Some forms of EMFs exposure are used to treat depression. EMFs have been shown to be effective in treating conditions of disease at exposure levels far below current public exposure standards. This leads to the obvious question. How can scientists dispute the harmful effects of EMF exposures while at the same time using forms of EMF treatment that are proven to heal the body?

Medical conditions are successfully treated using EMFs at levels below current public safety standards, proving another way that the body recognizes and responds to low-intensity EMF signals. Otherwise, these medical treatments could not work. The FDA has approved EMFs medical treatment devices, so is clearly aware of this paradox.

Random exposures to EMFs, as opposed to EMFs exposures done with clinical oversight, could lead to harm just like the unsupervised use of pharmaceutical drugs. This evidence forms a strong warning that indiscriminate EMF exposure is probably a bad idea.

No one would recommend that drugs used in medical treatments and prevention of disease be randomly given to the public, especially to children. Yet, random and involuntary exposures to EMFs occur all the time in daily life.

I would add that medical treatment is normally given for a fixed period and not continuously and chronically as for an MF exposure near powerlines.

It is in the field of animal navigation that most progress is currently being made in elucidating the *primary* mechanism by which MFs are known to interact with biological systems. The scientific literature in this field is vast but reference to five recent publications is given below (Ritz *et al.* 2000, 2004 & 2009; Begall *et al.* 2008, Burda *et al.* 2009). Current research suggests that birds posses a magnetic compass in the eye which functions by means of a process which is deeply rooted in chemistry known as the Radical Pair Mechanism. This is the mechanism by which low intensity MFs can increase the lifetime of free radicals. In birds, magneto-reception appears to occur in biological molecules known as cryptochromes, the same molecules that have been associated with magneto-reception in plants. Crucially, cryptochromes are present in human tissues generally, so here too they could be responsible for the primary detection of magnetic fields in man (though I stress such research has not yet been carried out). Whereas in birds the MF-induced increase in lifetime of free radicals is detected for the purposes of navigation, in general such an increase results in their greater ability to cause biological damage, especially in DNA.

The way in which MFs affect biological is becoming increasingly understood. A detailed description and excellent summary may be found in the Bionitiative Report. Here are some extracts

from Section 1 (note that this report also discusses health effects from radio frequency RF exposures, principally from mobile phones. The term 'ELF' refers to power frequency EMFs):

Page 17: Both ELF and RF exposures can be considered genotoxic (will damage DNA) under certain conditions of exposure, including exposure levels that are lower than existing safety limits.

Very low-level ELF and RF exposures can cause cells to produce stress proteins, meaning that the cell recognizes ELF and RF exposures as harmful. This is another important way in which scientists have documented that ELF and RF exposures can be harmful, and it happens at levels far below the existing public safety standards.

Page 18: There is substantial evidence that ELF and RF can cause inflammatory reactions, allergy reactions and change normal immune function at levels allowed by current public safety standards.

Page 19: Oxidative stress through the action of free radical damage to DNA is a plausible biological mechanism for cancer and diseases that involve damage from ELF to the central nervous system.

3. The 2007 BioInitiative Report

This is an independent report on EMF health effects, which covers both power frequency MFs and radio frequency EMFs such as from mobile phones. The authors include three former Presidents of the International Bioelectromagnetics Society and it presents an authoritative view of the state of the science and the need for precaution against exposure. The report may be accessed at: http://www.bioinitiative.org/index.htm

4. Summary

It is notable that some countries took action many years ago to limit public exposure to magnetic fields associated with high voltage powerlines, for example Sweden in 1996, Switzerland and Italy in 2000. Included in the substantial literature of EMF health effects is the 2007 study by Lowenthal *et al.* of increased risk of lymphoproliferative and myeloproliferative disorders in Tasmania.

It is indeed unfortunate that power companies and some governments continue to be ill advised on the adverse health effects of EMF exposures. In the case of overhead powerlines, we really are passed the stage where we should be erecting overhead powerlines close to house and centres of population.

Yours sincerely



Denis L Henshaw

Review bodies' assessments of EMF causation of various diseases. - health outcomes classified as Class 2B - possible causal.

Disease		IARC ¹ 2002	NIEHS 1999 ²	California 2002	EU: SCENIHR ³ February 2009
1. 2. 3. 4.	Childhood Leukaemia Adult Leukaemia Adult brain cancer Miscariage	Yes	Yes Yes	Yes Yes Yes Yes	Yes
5. 6. 7.	ALS ⁴ Alzheimer's disease Childhood brain tumours			Yes	Yes ⁵ Emerging evidence

¹International Agency for Research on Cancer

Table Note. A doubling of childhood leukaemia risk is seen for average exposures above 0.4 µT. Other health risks refer generally to increased risk around or below 1 µT average exposure. The current ICNIRP exposure guidelines are set at 100 µT, 250 times higher than 0.4 µT where the doubling of childhood leukaemia risk is seen.

Acronyms

HPA: Health Protection Agency (UK)

IARC: International Agency for Research on Cancer (a branch of WHO) ICNIRP: International Commission on Non-ionising Radiation Protection NIEHS: National Institute of Environmental Health Sciences (USA)

NRPB: National Radiological Protection Board (UK)

SCENIHR: Scientific Committee on Emerging and Newly Identified Health Risks (EU)

WHO: World Health Organisation

WHO EHC: World Health Organisation Environmental Health Criteria

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²US National Institute of Environmental Sciences

³EU: Scientific Committee on Emerging and Newly Identified Health Risks: Possible effects of Electromagnetic Fields (EMF) on Human Health.

⁴Motor neurone disease

⁵Studies only recently published

http://www.ehib.org/emf/RiskEvaluation/riskeval.html

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Estimated number of annual deaths under high voltage powerlines in the UK attributed to magnetic field exposure above 0.4 microtesla, μT. 10th March 2016

Denis L Henshaw, Emeritus Professor of Human Radiation Effects, University of Bristol. E-mail:

Introduction

This note uses data provided to the UK Stakeholder Advisory Group on EMF, SAGE to estimate the number of deaths occurring annually under UK powerlines as a result of exposure to powerline magnetic fields above $0.4~\mu T$. The number of estimated deaths is then expressed as a death rate in this group of people. This death rate is then compared with the death rate from road traffic accidents in the UK. In the note below, the death rate from road accidents is considered first.

1. Road fatalities in Great Britain.

The number of road deaths to the year ending June 2013 was 1,760.

(Source: https://www.gov.uk/...data/.../quarterly-estimates-apr-to-jun-2014.pdf)

The UK population during this period was 64.1 million (source Wiki/Google). From these figures, we can estimate a death rate averaged over the whole population.

Road accident rate = $1,760/64,100,000 = 2.746 \times 10^{-5}$ or <u>27 per million</u> or <u>0.027 per 1,000</u>

2. Death rate under powerlines 132 kV and above in Great Britain

In the accompanying spreadsheet provided by Professor Mike O'Carroll, column T, line 33 gives 482 attributable deaths in 240,000 people exposed to power frequency magnetic fields above 0.4 μ T (sources include high voltage powerlines of 132 kV and above and homes away from powerlines with fields >0.4 μ T). Of these, there would be **207 attributable deaths** in 103,200 people living near powerlines at or above 132 kV and exposed to fields >0.4 μ T.

The annual Death Rate under powerlines is therefore 207 in $103,200 = 2.07 \times 10^{-3}$ i.e. **2.07 per 1000** or **2,070 per million.**

This rate is **77 times higher** than the death rate on the roads.

Summary: 207 deaths are estimated to occur annually in the UK in the population exposed to magnetic fields above 0.4 microtesla, μ T, 2.07 per 1000 population. The death rate from road traffic accidents during this period was 0.027 per 1,000, a factor 77 times lower, yet it costs far more to mitigate against road accident deaths than to bury high voltage powerlines. These estimates are based on a risk cut-off of 0.4 μ T. A linear no-threshold, LNT model would result in a higher number of deaths in a higher number exposed near powerlines.

	Number	Rate per 1,000 population	Relative number per 1,000
Road fatalities 2013	1,760	0.027	1
Estimate annual death rate	207	2.07	77
under powerlines			

Montgomery Canal Restoration Project, Tourism and Jobs

Millions of pounds and tens of thousands of hours have been poured into restoring the canal and supporting the cultural heritage of the canal and the additional jobs and boost to the economy that restoration will provide. Restoration is critical to ensure the sustainable long-term future of the canal with tourism revenues essential to ensure the canal can be better managed and protected, saving it from falling into the disrepair that in turn would be harmful to the protected flora.

The special designation of the Montgomery Canal as a **Site of Special Scientific Interest** and as a **Special Area of Conservation** is a protected and fundamental pillar of the canal's restoration. Indeed, a special conservation plan agreed by over a dozen organisations including Powys County Council, Shropshire Council and Natural Resources Wales, which includes bringing more of the canal back to navigation, is a key part of securing both the canal's future and its protected environmental status.

National Trails and Nature Reserves

Another significant area of tourism are the Walkers of the **Glyndwr's Way** and **Offa's Dyke**, which passes through Llanymynech and, both are designated as National Trails. Additionally, these routes link up with the **Llanymynech Rocks Nature Reserve** and walkers come from all over the world and spend money along the whole of the Welsh-English border and not just in Montgomeryshire or Shropshire. The applicants planned route cuts straight through these historic gems.

The planned route of this project will impact these areas and the prospect of tourism revenues immensely and must be considered.

Birds and Other Wildlife

The **Peregrine Falcon** is designated by Natural England as a Schedule 1 species, **Protected** in the UK under the Wildlife and Countryside Act, 1981, with the added legal protection that goes with that. To date the applicant has made no reference to the presence of these magnificent birds at **Llanymynech Rocks Nature Reserve**.

According to the records of the Shropshire Peregrine Group, an affiliate of the British Trust for ornithology, Llanymynech Rocks has been one of the most consistently successful peregrine nest sites out of fewer than 20 in Shropshire, with 20 successful breeding years producing 45 fully fledged chicks in the 27 years between 1988 and 2015. The risks of this fastest and most iconic of British raptors colliding with overhead wires while hunting the Vyrnwy Valley are evident. Indeed, the applicant's current planned route cuts straight through the acknowledged hunting grounds to the east, south and west of Llanymynech, the south and east of Pant, and south and west of Crickheath.

Trees and Hedgerows

It has been confirmed that in building a pylon run like this, the need for access will mean that miles of hedgerow will have to be grubbed up and any trees along the route felled. We enjoy a particularly mature range of oak trees in this region, also ancient hedgerows. Loss of these will have a major impact on wildlife and the environment, not to mention the carbon release generated as all that wood is burnt.

Defence and Aviation Industry

No consideration has been given to the dangers to aviation in this area which are very real. The present proposed route passes right through CAA recognised and designated hot-air balloon launch fields and will render them unusable. Secondly the area of North Shropshire and the Welsh Borders around Kinnerley, Crickheath, Pant and Llanymynech is a designated military aviation training area for RAF Shawbury helicopter activities. These lines would be a major hazard and almost certainly in breach of CAA regulation.

Failure to Listen

There is a concern that the applicant is going through the motions with this process and failing to listen to the concerns raised by those directly affected. The applicant is on record as dismissing the fact that the views and environment from and near residents' homes (and they are homes, not just properties) is of no value. As one of the applicant's representatives said: 'Well, you don't own the view, do you?' The applicant has also stated that no compensation will be paid to anyone living near power lines, this in spite of the fact that property and land values are directly affected by proximity to power lines - as much as a 20% devaluation.

When the applicant was asked if they had a plan B should their current proposals be rejected, they stated, 'We don't need a Plan B. The pylons will happen and the best you can hope for ever is to engage with the process to try and mitigate the impact on your community."

Treasury Green Book

The process of decision making should follow the **Treasury green book**. This therefore must be within the Scoping Opinion. It is understood from a recent barrister's report on a project in East Anglia that 'to not use the green book would be "incorrect in law".

The green book will require a **full valuation of natural capital** ... including the value of landscapes and scenery. While you don't own a view, you do enjoy visual amenity, which is covered by natural capital.

Adherence to the Holford Rules

The Holford Rules are a set of guidelines on overhead line routeing were first formulated in 1959 by Sir William, later Lord, Holford, who was a part-time member of the CEGB. National Grid has reviewed these guidelines, known as the 'Holford Rules', and concluded that they have stood the test of time. National Grid therefore intends to continue to employ them as a basis of the company's approach to overhead line routeing. The applicant has failed to follow these rules in the planning of the proposed route.



Date of Submission 16th February 2024

The Holford Rules

Guidelines on overhead line routeing were first formulated in 1959 by Sir William later Lord, Holford, who was a part-time member of the CEGB. National Grid has reviewed these guidelines, known as the 'Holford Rules', and concluded that they have stood the test of time. National Grid therefore intends to continue to employ them as a basis of the company's approach to overhead line routeing.

Since the formulation of the original Rules, formal requirements for environmental assessment have been introduced. Whilst environmental assessment for overhead lines addresses wider topics than the visual amenity issue on which the Rules concentrate, they remain a valuable tool in the selecting and assessing potential route options as part of the environmental assessment process. The original Rules and their added notes of clarification are set out below.

GUIDELINES FOR THE ROUTEING OF NEW HIGH VOLTAGE OVERHEAD TRANSMISSION LINES

Rule 1:

Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence.

Note on Rule 1

Investigate the possibility of alternative routes, avoiding if possible the areas of the highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements.

Areas of highest amenity value are:

Areas of Outstanding Natural Beauty National Parks Heritage Coasts World Heritage Sites

Rule 2:

Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction.

Note on Rule 2

Some areas (e.g. Site of Special Scientific Interest) may require special consideration for potential effects on ecology (e.g. to their flora and fauna).

Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.

Rule 3:

Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.

Note of Rule 3

Where possible choose inconspicuous locations for angle towers, terminal towers and sealing end compounds.

Rule 4:

Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.

Rule 5:

Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.

Note on Rules 4 & 5

Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints.

Minimise the exposure of numbers of towers on prominent ridges and skylines.

Where possible avoiding cutting extensive swathes through woodland blocks and consider opportunities for skirting edges of copses and woods.

Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape.

In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.

Note on Rule 6:

In all locations minimise confusing appearance.

Arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance; where routes need to diverge, allow where practicable sufficient separation to limit the effects on properties and features between the lines.

Rule 7:

Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.

Note on Rule 7

When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development.

Alignments should be chosen after consideration of effects on the amenity of existing development and on proposals for new development.

When siting substations take account of the effects of the terminal towers and line connections that will need to be made and take advantage of screening features such as ground form and vegetation.

SUPPLEMENTARY NOTES

Residential Areas

Avoid routeing close to residential areas as far as possible on grounds of general amenity.

Designations of County, District and Local Value

Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value.

Alternative Tower Designs

In additional to adopting appropriate routeing, evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified.



Wendy Talbot
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: EN020035

Our Reference: DIO10061567

MoD Telephone:

E-mail: <u>DIO-safeguarding-statutory@mod.gov.uk</u>

Emma Cottam
National Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
BRISTOL
BS1 6PN

8 February 2024

Dear Emma

MOD Safeguarding - SITE OUTSIDE SAFEGUARDING AREA (SOSA)

Proposal: Scoping consultation and notification of the Applicant's contact details and

duty to make available information to the Applicant if requested. Application by Green GEN Cymru (the Applicant) for an Order granting Development Consent for the Green GEN Vyrnwy Frankton Project (the Proposed

Development)

Location: Vyrnwy Valley to Lower Frankton in Shropshire

Grid Ref: Vyrnwy Valley Easting: 304816 Northing: 305541 Lower Frankton Easting: 335587 Northing: 331774

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The application is for a Scoping Opinion on the proposed development of approximately 50km of 132kV overhead power line supported on L7 towers with an average height of 27m.

This application relates to a site outside of Ministry of Defence safeguarding areas but does fall within Low Flying Areas 7 and 9 (LFA 7 and LFA 9), areas within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of electrical towers supporting approximately 50km of high voltage (132kV) overhead power lines through this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address this impact, and given the location and scale of the development, the MOD may require a condition to be added to any consent issued requiring that sufficient data is submitted to ensure the towers can be accurately charted to allow deconfliction.

At this outline application stage, where no details are available for the design or maximum height of the proposed development, MOD representations are limited to the principle of the development only. In summary the MOD has concerns and should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Green GEN Vyrnwy Frankton Scoping Report" dated January 2024. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Wendy Talbot Assistant Safeguarding Manager DIO Safeguarding From: <u>.Box.Assetprotection (National Gas)</u>

To: <u>Vyrnwy to Frankton</u>

Subject: RE: [EXTERNAL] EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and

Consultation

Date: 26 January 2024 10:06:59

Attachments: <u>image001.png</u>

image002.png image008.png image009.png image010.png image003.png

You don't often get email from box.assetprotection@nationalgas.com. Learn why this is important

Good morning,

Thank you for your email.

Regarding your scoping notification for EN02003, there are no National Gas Transmission assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Asset Protection Team

From: Vyrnwy to Frankton <vyrnwytofrankton@planninginspectorate.gov.uk>

Sent: 24 January 2024 11:31

To: .Box.Assetprotection (National Gas) <box.assetprotection@nationalgas.com>

Cc: Kamille Liddar (National Gas) < Kam. Liddar @nationalgas.com>

Subject: [EXTERNAL] EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification

and Consultation

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

Dear Sir/Madam

Please see attached correspondence on the proposed Green GEN Vyrnwy Frankton Project.

Please note the deadline for consultation responses is **21 February 2024** and is a statutory requirement that cannot be extended.

Kind regards

Todd Brumwell



Ensuring fairness, openness and impartiality across all our services

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For the registered information on National Gas Transmission please use the attached link: https://nationalgas.com/about-us/corporate-registrations.





www.nationalgrid.com

SUBMITTED ELECTRONICALLY: vyrnwytofrankton@planninginspectorate.gov.uk

21 February 2024

Dear Sir/Madam

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 RESPONSE

I refer to your letter dated 24th January 2024 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines forms an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Overhead Lines
ZZK ROUTE 400kV OHL

Associated cable fibre: LEGA4 SHRE4 FIBRE OPTIC SECTION 07 ZZK05

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd

National Grid House Warwick Technology Park Gallows Hill, Warwick CV34 6DA



Onshore Infrastructure

A new substation will be required to facilitate customer connections along the Legacy to Shrewsbury 400kV Overhead Line. The location of the new substation is still to be confirmed.

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

I enclose a plan showing the location of NGET's apparatus in the scoping area.



Specific Comments - Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 8 Technical Specification for "overhead line clearances Issue 3 (2004)".
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the
 depth of our cables will subsequently alter the rating of the circuit and can compromise the
 reliability, efficiency and safety of our electricity network and requires consultation with
 National Grid prior to any such changes in both level and construction being implemented.



To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



Tiffany Bate
Development Liaison Officer
Commercial and Customer Connections
Electricity Transmission Property Land and Property

nationalgrid National Grid Web Map





Legend

OHL 400Kv

OHL 400Kv

Commissioned

Notes

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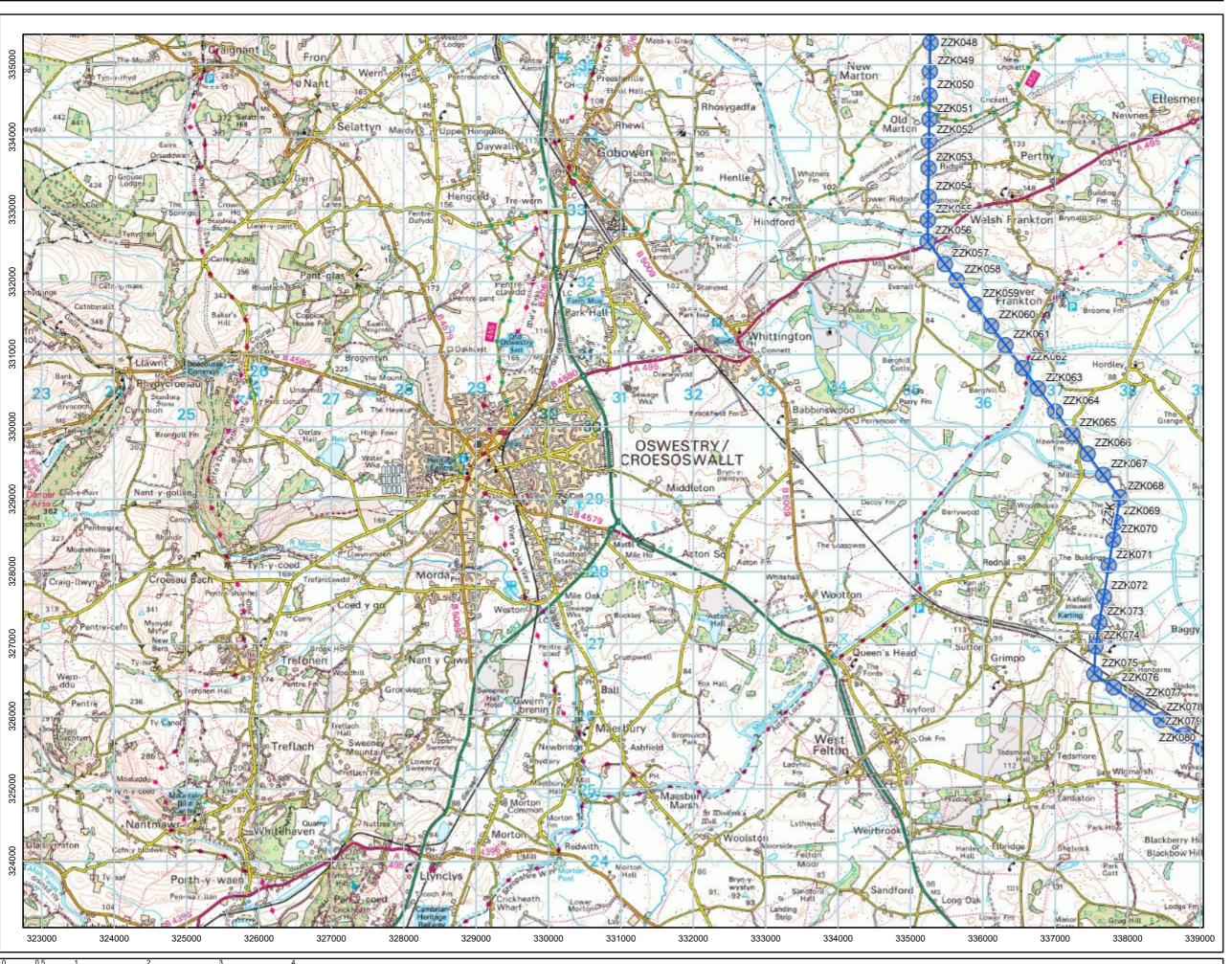
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national grid | National Grid Web Map





Legend

Fibre Cable

Fibre Cable

Commissioned

Towers

Towers

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OHL 400Kv

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<u>Notes</u>

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Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

 $\textbf{Email:} \ asset protection@national grid.com$

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the highvoltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a lifethreatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals



Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com Phone: 0800 001 4282

Electrical clearance from overhead lines

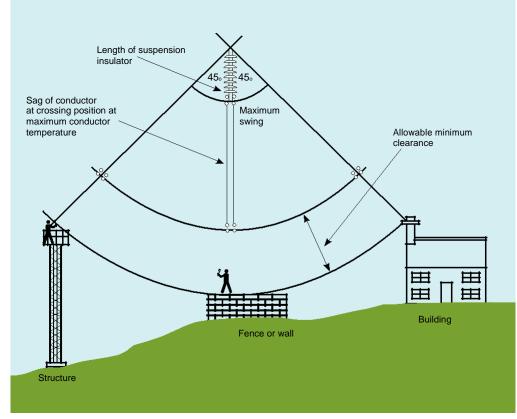
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks*Association TS 43-8 details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

Section continues on next page »





The undergrounding of electricity cables at Ross-on-Wye

Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as HSG 47 (Avoiding Danger from Underground Services).

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, onsite supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

Section continues on next page »



Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

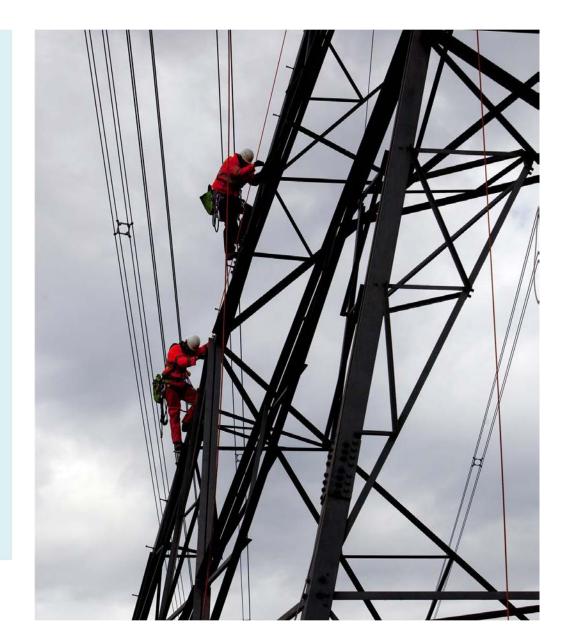
Maintenance access

National Grid needs to have safe access. for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

Section continues on next page »





Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (as outlined in ENA TS 43-8).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metalclad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**





Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i)The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

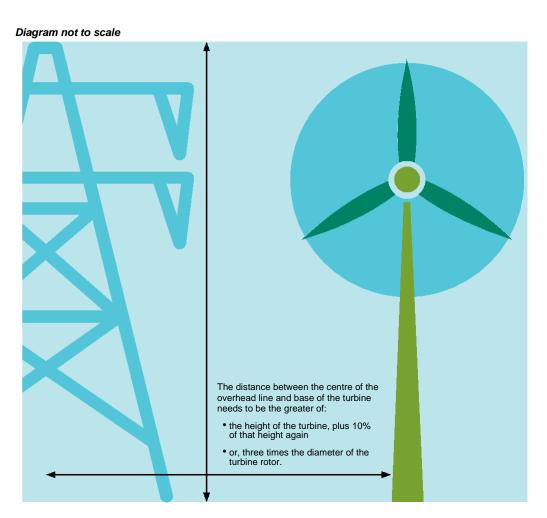
Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

Section continues on next page »



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



« Section continued from previous page

The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around

the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale There are several factors to consider when positioning solar farms near National Grid assets Underground The highest point on the solar panels cables under must be a minimum or near of 5.3m from the overhead lines lowest conductors may be subject vork area to impressed voltage

HGV access corridor

Including access through any compound gates.

During maintenance – and especially re-conductoring

– National Grid would need enough space
near our towers for winches and cable
drums. If enough space is not available, we
would require solar panels to be temporarily
removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- · Explain the nature of the issue or hazard
- Give as much information as possible so we can identify Monday to Friday 08:00-16:00 the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer
- ¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:

assetprotection@nationalgrid.com

Call Asset Protection on: 0800 0014282

Opening hours:

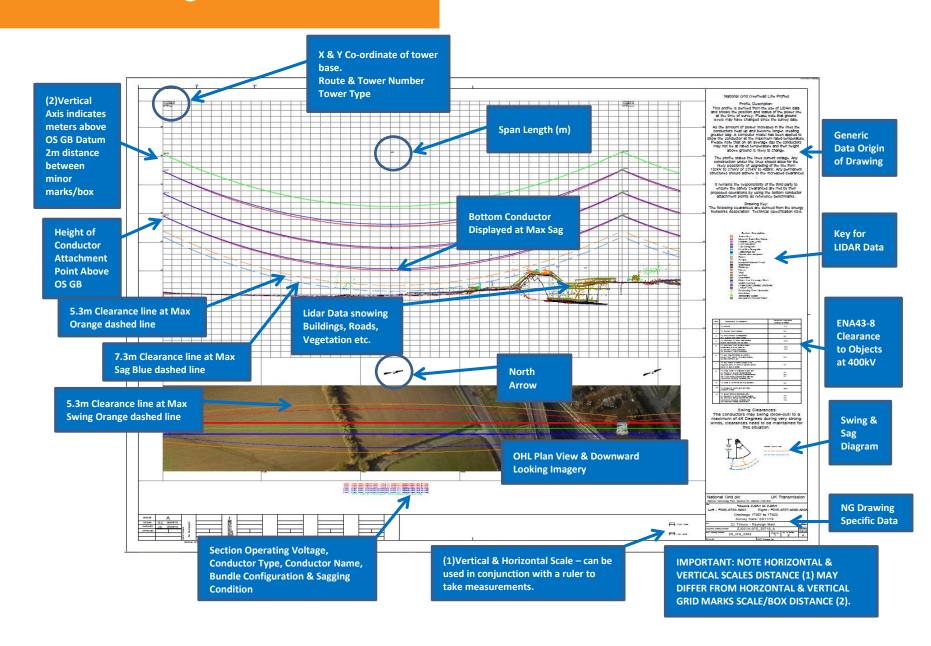
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14 APPENDIX A



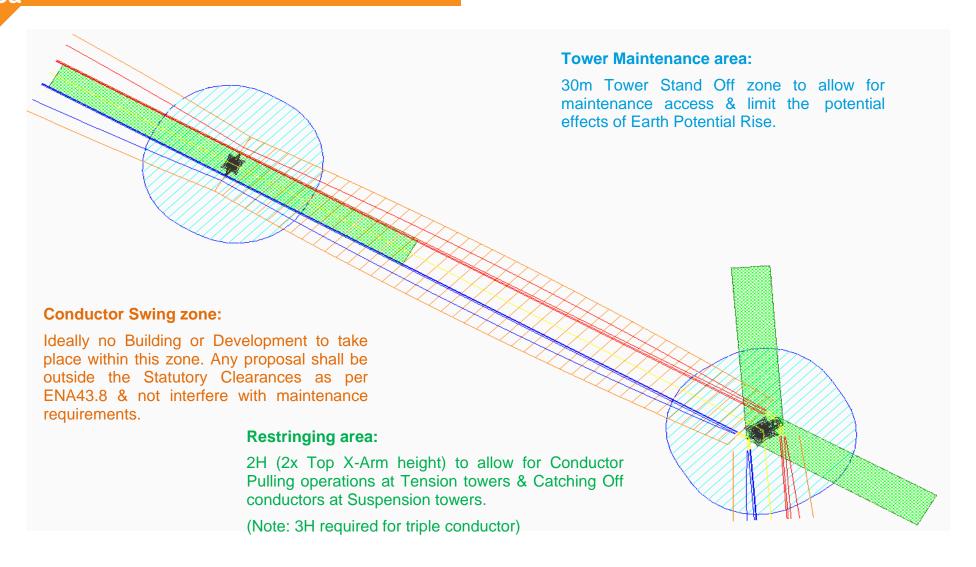
OHL Profile Drawing Guide



15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



From: NATS Safeguarding
To: Vyrnwy to Frankton

Subject: RE: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation [SG36820]

Date: 25 January 2024 14:43:00

Attachments: <u>~WRD0004.jpg</u>

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You don't often get email from natssafeguarding@nats.co.uk. Learn why this is important

Our Ref: SG36820

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley, Fareham, Hants PO15 7FL www.nats.co.uk



NATS Public

From: Vyrnwy to Frankton <vyrnwytofrankton@planninginspectorate.gov.uk>



If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

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Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.



Ein cyf/Our ref: CAS-247667-J6J2 Eich cyf/Your ref: EN020035-000009

The Planning Inspectorate Environmental Services Operations Group 3 Temple Quay House 2 The Square Bristol, BS1 6PN

Dyddiad/Date: 21/02/202421 February 2024

Annwyl Syr/Madam/Dear Sir/Madam,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11

BWRIAD/PROPOSAL: Green GEN Vyrnwy Frankton Project proposed construction and operation of a new 132 kilovolt (kV) grid connection which at this stage is proposed to comprise an overhead line (OHL) supported on 'L7' steel lattice towers as well as a collector substation and a cable sealing end compound located in close proximity to the Llyn Lort Energy Park.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 24 January 2024.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning applications or on the submission of a more detailed scoping report or the full Environmental Statement (ES). At the time of any planning application there may be new information available which we will need to consider in making a formal response.

These comments include those matters NRW consider will need to be taken into consideration and applied to the Environment Impact Assessment (EIA) and the resulting ES. Our comments are set out below following the chapter order in the Scoping Report.

The ES for this development should include sufficient information to enable you to determine the extent of any environmental impacts arising from the proposed scheme. Evaluation of the impacts of the scheme should include direct and indirect; secondary; cumulative; short, medium, and long term; permanent and temporary; positive and negative, and construction, operation phase.

We welcome the submission of the following report and the associated documents provided on your website:

Green Gen Vyrnwy Frankton Scoping Report dated January 2024

- Green GEN Vyrnwy Frankton Scoping Report Appendix D Figures 1.1 7.10
- Green GEN Vyrnwy Frankton Scoping Report Appendix D Figures 8.1 10.1
- Green GEN Vyrnwy Frankton Scoping Report Appendix D Figures 13.1 16.1

Landscape

We have reviewed the scoping report and relevant sections and have the following comments in respect of landscape and visual impacts.

The main components of the proposed development are:

- 132kV overhead electricity transmission line (OHL) supported on L7 steel towers with an average height of 27m.
- Collector Substation up to 200 x 200m in area.
- Cable Sealing End Compound approximately 40 x 40m in size.

The closest statutory designated landscapes in Wales to the proposals are:

- Eryri National Park (ENP); and
- Bryniau Clwyd A Dyffryn Dyfrdwy / The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).

The proposed collector substation and cable sealing end compound (search areas) and the OHL Scoping Corridor are between 13-15km from the ENP boundary at their closest points (approximately). The OHL Scoping Corridor is over 9km from the AONB boundary at its closest point (approximately). At these distances and with consideration for the nature of the proposals and the intervening landscape context, we consider the proposals do not have the potential to affect the purposes of the National Park or the AONB. Therefore, NRW do not require to be consulted on the landscape and visual effects of this proposal.

We therefore agree with the proposed scope of the ES which scopes out effects on the ENP and AONB (Table 7.2: Proposed EIA Scope).

We wish to highlight that the Scoping Corridor and Provisional Landscape Visual Impact Assessment (LVIA) Study Area (Figure 7.1) overlap with the Area of Search (AoS) for the North East Wales National Park Designation Project. The extent to which the new national park becomes a material consideration may change during the application and therefore we recommend the AoS is mapped and referenced as part of the landscape and visual impact assessment.

Ecology

We have reviewed the surveys to be scoped out as set out in paragraph 8.36 of the scoping report. Whilst we agree with Water Vole and Reptile surveys being scoped out, we consider that the scope may need to be amended if Adder are subject to changes to schedule listing under the Wildlife And Countryside Act, 1981.

Paragraph 8.37 of the scoping report refers to the ES being undertaken in accordance with the CIEEM Guidance (2018, updated). We advise that the impact assessment needs to be informed by conservation status of species.

NRW are unclear as to scoping out of potential effects on protected species (fourth bullet set out in paragraph 8.58) given their listing as material planning consideration.

Subject to the above comments regarding adder and the inclusion of a bat roost assessment we agree with Table 8.2 proposed scope of ES.

In general the ES for this development should include sufficient information to enable the local planning authorities to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.

Evaluation of the impacts of the scheme should include: direct and indirect; secondary; cumulative; short, medium and long term; permanent and temporary; positive and negative, and construction, operation and decommissioning phase and long-term site security impacts on the nature conservation resource, landscape and public access.

Description of the Project

Within the ES, the proposed scheme should be described in detail in its entirety. This description should cover construction, operation and decommissioning phases as appropriate and include detailed, scaled maps and drawings as appropriate.

Illustrations within the Environmental Statement

Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the ES such as biodiversity.

Description of Biodiversity

The ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Significance and Favourable Conservation Status

We advise that EIA considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration to be given to current conservation status (CCS), and demonstration of no likely detriment to maintenance of favourable conservation status (FCS) during construction operation and decommissioning phases of the scheme. Reference to CCS and FCS in accordance with EC Guidance¹ is advocated.

Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present. We also advise that Habitats Directive Annex 1 habitats are identified as part of this assessment.

Protected Species

We advise the site is subject to assessment to determine the likelihood of protected species and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and if the surveys deviate or there are good reasons for deviation that full justification for this is included within the ES.

¹ EUR-Lex - C(2021)7301 - EN - EUR-Lex (europa.eu). See section 3.2.3.b) re conservation status

Should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium, and long term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial, tenure, and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA. In respect of European Protected Species, we advise consideration of Section 3.3.2 of <u>Guidance on the strict protection of animal species of Community interest under the Habitats Directive</u>

Where a European Protected Species is identified and the development proposal is predicted to likely contravene the legal protection they are afforded, a licence should be sought from NRW. The ES must include consideration of the requirements for a licence and set out how the works will satisfy each of the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by NRW, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- (b) There is no satisfactory alternative and
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are translated into planning policy through <u>Planning Policy Wales</u> (<u>PPW</u>), <u>Edition 12</u>, dated February 2024, sections 6.4.35 and 6.4.36 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority should take them into account when considering development proposals where a European Protected Species is present and *avoid developments with planning permission* subsequently not being granted derogations in relation to European protected species, planning authorities must take the above three requirements for derogation into account when considering development proposals where a European protected species is present

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologists on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.

NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g. bat groups, mammal groups).

Legislation and Policy Compliance Review

We advise that provisions of the ES audit compliance in respect of relevant nature conservation legislation (UK and Wales), together with relevant local and national policies including BS 42020:2013 should be used to inform the review.

Bats

We advise that the project will require a Habitats Regulations Assessment (HRA) as per the Conservation of Habitats and Species Regulations 2017. In particular, the HRA and EIA will need to consider the effects of the proposed project on the Tanat and Vyrnwy Bat Sites Special Area of Conservation (SAC) and its feature: Lesser Horseshoe Bats - *Rhinolophus hipposideros*.

As well as the Lesser Horseshoe Bat roosts (maternity and hibernation) included within these protected sites (i.e. the SAC and its component Special Site of Scientific Interest (SSSI)) there are significant Lesser Horseshoe Bat roosts, particularly within the Meifod valley, that are functionally linked to the SAC but don't currently form part of the protected site.

NRW collects and holds data (emergence and hibernacula counts) on the Tanat and Vyrnwy Bat Sites SAC, component SSSIs sites and non-designated roosts that are functionally linked to the protected sites. This information is sent to the Bat Conservation Trust and is used as part of their national monitoring programme.

The HRA and EIA must consider the impacts on both the Lesser Horseshoe Bats within the protected sites and outside of the SAC where they are using the unnotified roosts. This should include the connectivity links between the roosts themselves, between the roosts and feeding habitats, impacts to the quantity and quality of feeding habitat and resting places, and any other impacts such as roost disturbance.

In particular, the HRA and will need to consider how lesser horseshoe bats move across the Meifod valley. We suggest that in order to consider this that desk and field-based surveys will be required. We understand that field surveys of bats moving across the valley may have been undertaken in the past for other proposed pylon projects in the Meifod Valley.

In relation to Table 8.1 for the Tanat and Vyrnwy Bat Sites SAC that states:

'This bat community could occasionally visit the route option; however, the habitats are primarily open grassland fields, which are of poor suitability for lesser horseshoe bats, which favour woodland habitats.'

We advise that because there are hibernation and maternity roosts on both sides of the Meifod Valley, the hedgerows and trees within the valley may be providing habitat connectivity that is essential to the favourable conservation status of the SAC. Therefore, this should be considered in the EIA.

Fish

In respect of paragraphs 3.11 to 3.17 the undergrounding of the cables has the potential to impact watercourses and the fish species that they support if cables are installed across or beneath watercourses. Water course crossings should be delivered via directional drilling rather than open cut methods.

Paragraph 3.35 proposes to use open cut installation with an excavation swathe of approximately 25m in width which are likely to cause significant impacts to watercourses and the fish populations they support. Consequently, open cut methods are not suitable for watercourse crossings.

The use of existing tracks and watercourses crossings is to be maximised with existing crossings being upgraded if necessary (Para. 3.37). Designs for any new or improved water course crossings should retain a natural water course bed, maintain fish passage and be agreed in conjunction with NRW.

We have also reviewed Chapter 8 Ecology in respect of Fish. No specific mention of watercourses has been made in this section. Watercourses are included on the Environment (Wales) Act 2016 Section 7 list of the habitats of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. This should be included in the ES.

We note that chapter 8 does not mention fish species. Atlantic salmon, brown trout, lamprey species and European eel are all present on the River Vyrnwy and its tributaries and are included on the Environment (Wales) Act 2016 Section 7 list of the species of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. We recommend these species should be considered as part of the assessment.

Paragraph 8.36 states that watercourses will be spanned but chapter 3 refers to the potential undergrounding of cables. If underground cables are to cross watercourses impacts on watercourses and the fish populations they support need to be scoped in. NRW has data on fish populations that can be <u>requested</u>.

Table 8.2 of the scoping report states that fish are to be screened out of the EIA scope for both construction and the operation phases of development. There is insufficient detail to justify fish being screened out at this stage. The River Vyrnwy catchment supports populations of endangered and vulnerable species and the undergrounding of cables has the potential to impact these species. We do not agree that fish should be screened out and further assessment is required.

Section 13 of the scoping report makes further references to watercourse crossings. Watercourse crossings by underground cables have the potential to impact hydrology and water quality. The fact that 'if works are required within or in close proximity to watercourses additional consent/ permits will be required' is not sufficient justification to scope out impacts from construction activities. These impacts need to be assessed and suitable mitigation proposed, agreed and implemented e.g. watercourses being spanned or underground cables being installed under watercourses using directional drilling rather than open cut techniques. This needs to be taken into account and detailed within the scope of the ES.

Invertebrates

We note that invertebrates are scoped out of the EIA (see Table 8.2), however the Vyrnwy has an important Exposed Riverine Sediment (ERS) invertebrate fauna – see attached report that notes 'The Yellow Crucifer Weevil and Five-spot Ladybird have been found on the Vyrnwy'. We advise that assurance needs to be given that the river can continue to meander without interference so that ERS habitat and associated invertebrate fauna is maintained. We suggest Invertebrates are scoped into construction and operation phases of development in the assessment.

Waterbodies

Regarding Section 8.15, we wish to advise that the Vyrnwy valley near Meifod includes many waterbodies and also oxbow lakes. Some may have potential to support great crested newts and some evidence shows that one once supported *Oenanthe fistulosa*, a species that is listed as Vulnerable to extinction in the 2021 red-list for Great Britain, there are only two known locations for this species in Montgomeryshire, and it is listed in Section 7 of the Environment (Wales) Act 2016.

There is no specific mention of considering priority species listed as a result of Section 7 of the Environment (Wales) Act 2016 in Section 8.6 information sources and 8.19 which should be considered in the ES. We refer you to https://www.biodiversitywales.org.uk/File/56/en-GB.

Questions for consultees

Q8.1 – Do consultees agree that the scope of desk studies and ecological baseline surveys proposed are sufficient and proportionate to inform the design and assessment of the Project?

No, the assessment should include more consideration of watercourses and fish species if undergrounding of cables is going to occur beneath watercourses. Please note our comments on the proposed protection afforded to Adder which may need to be informed by appropriate survey efforts and the connectivity of known bat roosts, feeding and resting habitat above.

Q8.2 – Do consultees agree with the assessment method (including scoped in/scoped out effects)?

No. Whilst we agree with the scope for protected species (subject to Adder) for the reasons outlined above, there is insufficient justification to scope out impacts on fish at this stage. We also advise that Groundwater Dependant Terrestrial Ecosystems (GWDTE's) and deep peat impacts should be scoped in for construction and operational phases of development.

Q8.3 – Do consultees hold any data sets that could be made available to inform the assessment?

Yes, NRW hold extensive fish data for the Vyrnwy catchment in Wales. Lesser Horseshoe Bat numbers within SSSI/SAC sites, as well as non-designated roosts that are functionally linked to the protected sites are available, but the applicant should request this information from the Bat Conservation Trust in the first instance.

Q8.4 - Do consultees agree with the proposed bat surveys and the approach to the assessment?

NRW advise that scoping out of bat roost assessments may have material implications on the ability to demonstrate no detriment to the maintenance of the favourable conservation status of each local population of bats potentially impacted during the construction phase of the proposals. This is based on the information provided.

Ornithology

We have reviewed chapter 9 of the Scoping report and offer the following comments in response to the questions for consultees.

Q9.1:Do consultees agree that the scope of desk studies and ornithological baseline surveys proposed are sufficient and proportionate to inform the design and assessment of the Project?

We note that paragraph 9.16 states, 'In accordance with NatureScot guidance adopted by NRW and EN (SNH, 2017), one full year of ornithological surveys will be completed." NatureScot guidance recommends that "two years survey will be required unless it can be demonstrated by the developer that a shorter period of 11 survey is sufficient". No justification as to why only one full year of surveys are being undertaken rather than the recommended two years of survey. The nature of the surveys and their relevant buffer are broadly appropriate, however:

- No details on how assessment of winter birds will take place. Will this be covered by the vantage point surveys?
- Location and view sheds of the 12 vantage points will be required to enable whether they provide sufficient coverage.
- No details have been provided on the survey effort (e.g. number of visits, numbers of hours of observation) to allow us to determine if the survey effort is adequate.

Q9.2: Do consultees agree with the assessment method (including scoped in/scoped out effects)?

Yes

Q9.3: Do consultees hold any data sets that could be made available to inform the assessment?

No

Water Resources

Hydrology/Hydrogeology

We note paragraph 13.36 states "...no large scale consumptive water uses and no effect on the downstream continuity of flow in watercourses." It is considered appropriate that the impact on existing water interests (including Private Water Supplies (PWS)) is scoped out of the ES from our point of view as our concerns are around water abstraction, impoundment and any impacts of hydrological flow pathways.

NRW are satisfied with the assessment of scoping in the potential impacts on groundwater flows and levels (paragraph 14.37). We agree with "scoping in" Water Resources, Ground Conditions / Geology / Hydrogeology, Soils and Agriculture and Cumulative Effects. NRW agree with the proposed data collection and assessment methodologies to be presented in the ES.

NRW are satisfied with the Competent Expert for Water Resources, and the proposed project report structure appears suitable.

Flood Risk

The following flood risk comments are made on the basis that the proposals will consist of above ground cabling and pylons, only. Should any underground sections be required, our comments may differ.

With reference to existing and emerging guidance, the planning system must make provision for and be able to accommodate proposals for new infrastructure which is essential to

addressing the causes of climate change or is essential for continued economic development or is both. Proposals for new essential infrastructure must meet the justification tests and must clearly demonstrate why any location in flood zone 3 is essential and why it cannot be reasonably located in less vulnerable locations. It will be up to local planning authorities to determine whether proposals constitute essential infrastructure.

Geomorphology

It is recommended that the ES specifically addresses fluvial geomorphology and the associated physical form and processes of the watercourse separately (e.g. baseline conditions, receptors, likely effects, mitigation, opportunities for enhancement/restoration etc). At present the scoping report largely fails to consider the impact of the development on the geomorphology of the watercourses it is likely to impact.

At present it is unknown whether the buffer of 250m is sufficient to address the geomorphological concerns (e.g. floodplain flow velocities and associated scour and the future lateral movement of the watercourses involved – wider sources of information are likely to be needed e.g. broader historical mapping and BGS scour mapping).

It is unknown why it is proposed to assess the impact via the Design Manual for Roads and Bridges (DMRB) LA113. It is suggested that more river focused guidance is used.

Infrastructure should be positioned outside of Flood Zone 3 at all times to avoid environmental and long term impacts on the infrastructure itself. Where such measures are not possible flow velocity, scour and/or sediment modelling may be required and design parameters broadened to demonstrate legislative compliance and structural resilience.

Temporary works impacts on fluvial geomorphology should be assessed and avoided wherever possible. The cumulative impact of temporary works should also be considered. Watercourse crossings should be clear span wherever possible.

With reference to paragraph 14.33 of the Scoping report and the fluvial geomorphology of sites of geological importance in close proximity to the scoping corridor, many of the watercourses in this area, also being subject to similar conditions, are incredibly mobile and as such similar due regard should be applied.

Questions for consultees

Q13.1: It has been assumed that infrastructure to support the transmission (towers etc) will be deemed as water compatible or if not, as essential infrastructure. Please could you confirm that this approach is acceptable?

In the interests of the Future Generations Act and Water Framework Directive (WFD), transmission towers are not considered water compatible and should be placed outside of the zone of future influence of watercourses. Relocating transmission towers that have become exposed to rivers laterally migrating is a well-known difficult issue to resolve. Pylons should be designed to avoid floodwaters wherever possible.

Q13.2 Given the very localised nature of proposed permanent ground based infrastructure i.e. towers, it has been assumed that formal drainage arrangements will not be required with incidental water returned to ground adjacent to the structure. Please could you confirm that this approach is acceptable?

We defer to the relevant Local Planning Authority (LPA) as the Lead Local Flood Authority responsible for surface water comments.

Q13.3 Are you in agreement that the proposed desk and field surveys are sufficient for the purposes of the EIA?

The desk and field based surveys presently proposed nearly entirely omit fluvial geomorphology and are therefore insufficient.

It is recommended that specific geomorphological expertise is sought to address these issues (fluvial geomorphology is very different to hydrogeological expertise presently proposed as providing this advice).

With regards to flood risk, Flood Map for Planning (FMfP) should be used to highlight where any pylons are required/proposed in flood zones 2 or 3. Further site based assessment may then be required to determine suitability. With reference to the attached photos (pre and post), it should not be assumed that a reasonable horizontal clearance distance, in line with Flood Risk activity exemption 2: The erection of an electric cable service crossing over a main river (Natural Resources Wales / Flood risk activity exemptions), is a safe distance. Any pylons in FMfP zones 2 or 3 which are considered necessary should be supported by geomorphology assessment which addresses likely lateral movement at these locations and whether pylons could be affected during their lifetime. If there is a likelihood of being affected by lateral erosion, suitable mitigation would be considered as relocation of the pylon and not revetment or re-routing of the watercourse.



Ground Conditions, Geology and Hydrogeology

We note that the scoping report correctly identifies Meifod Geological Conservation Review (GCR) site (Ffridd Mathrafal Track Section SSSI [SJ 113101]), Afon Banwy GCR site (Afon Banwy ger Mathrafal SSSI [SJ 1395 1030]) and Afon Vyrnwy GCR site as being located in or close to the proposed scoping corridor. The first two are 'hard rock' sites (an NRW forestry track cutting and a river section, respectively) and are unlikely to be adversely affected by the proposal.

However, the scoping corridor does transect the southern sector of Afon Vyrnwy GCR site, to the west of Llanymynech, which is important for its fluvial geomorphological features, some components of which are topographically subdued and both vulnerable and fragile. We welcome the fact that the scoping report identifies this vulnerability and that 'careful design will be required'. NRW does have a Site Management Report for this site ('Afon Vyrnwy', Site Management Report Series, Dr Bob Mathews, August 1995) which is held at NRW's library in Bangor and which may be available for study. We can confirm that in our opinion a desk and field survey are sufficient for the purposes of the EIA but question whether there is flexibility in the design schematics to relocate any infrastructure to the southern margin of the Afon Vyrnwy GCR site. We advise that this should be reflected in the ES and any relevant justification be provided.

Peat

We have reviewed the relevant chapters of the scoping report in respect of Peat. We note that the scoping report includes the proposed powerline corridor, however no specific detailed locations have been given of proposed infrastructure. It appears that the proposal is unlikely to directly impact peat underpinned by a SSSI/SAC designation and we will not be providing specialist advice on the impacts to peat.

We note that chapter 15 scopes into the EIA the potential effects upon soils (including peat) for the construction phase and scopes out for the operational phase of development. The proposal will include an Outline Soil Management Plan and Outline Peat Management Plan if it is confirmed by the peat depth probing that there will be an impact to peat resources.

We would also advise that paragraph 8.6 which sets out information sources to inform the baseline assessment does not include the following sources which will be of assistance for the section of the corridor within Wales. We refer you to the following:

- DataMapWales Unified peat layer
- DataMapWales WOM21 Deep peat and modified deep peat
- DataMapWales Section 7 species and habitats in Wales

Questions for Consultees

Q15.1: Are the proposed matters to be scoped out acceptable?

Yes

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our <u>website</u>. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our <u>website</u> for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Bryn Pryce BSc MSC MRTPI Uwch Cynghorydd Cynllunio Datblygu / Senior Development Planning Advisor Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: MidPlanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

From: <u>Claire Hall</u>

To: <u>Vyrnwy to Frankton</u>

Subject: FW: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 26 January 2024 13:07:26

Attachments: image002.png

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GGVF - Letter to stat cons Scoping & Reg 11 Notification.pdf

image018.png GGVF - Letter to Scoping area.pdf

Importance: High

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NPTCBC Planning Ref. P2024/0064

Dear Sir/Madam

Thank you for your email dated 24 January 2024. Having examined the project details, it appears that the geographical area within scope for the project (see copy attached) does not include any land within or anywhere near potential vantage points of the Neath Port Talbot County administrative area/boundary. On this basis we have no comments or information to offer in this matter and would request we be removed as a consultee for the project going forward.

I trust this information is of assistance.

Kind regards

Claire Hall

Senior Planner – Uwch Cynllunydd

Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot Tel/Ffôn:

Email / E-bost: @npt.gov.uk

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Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch <u>yma</u>

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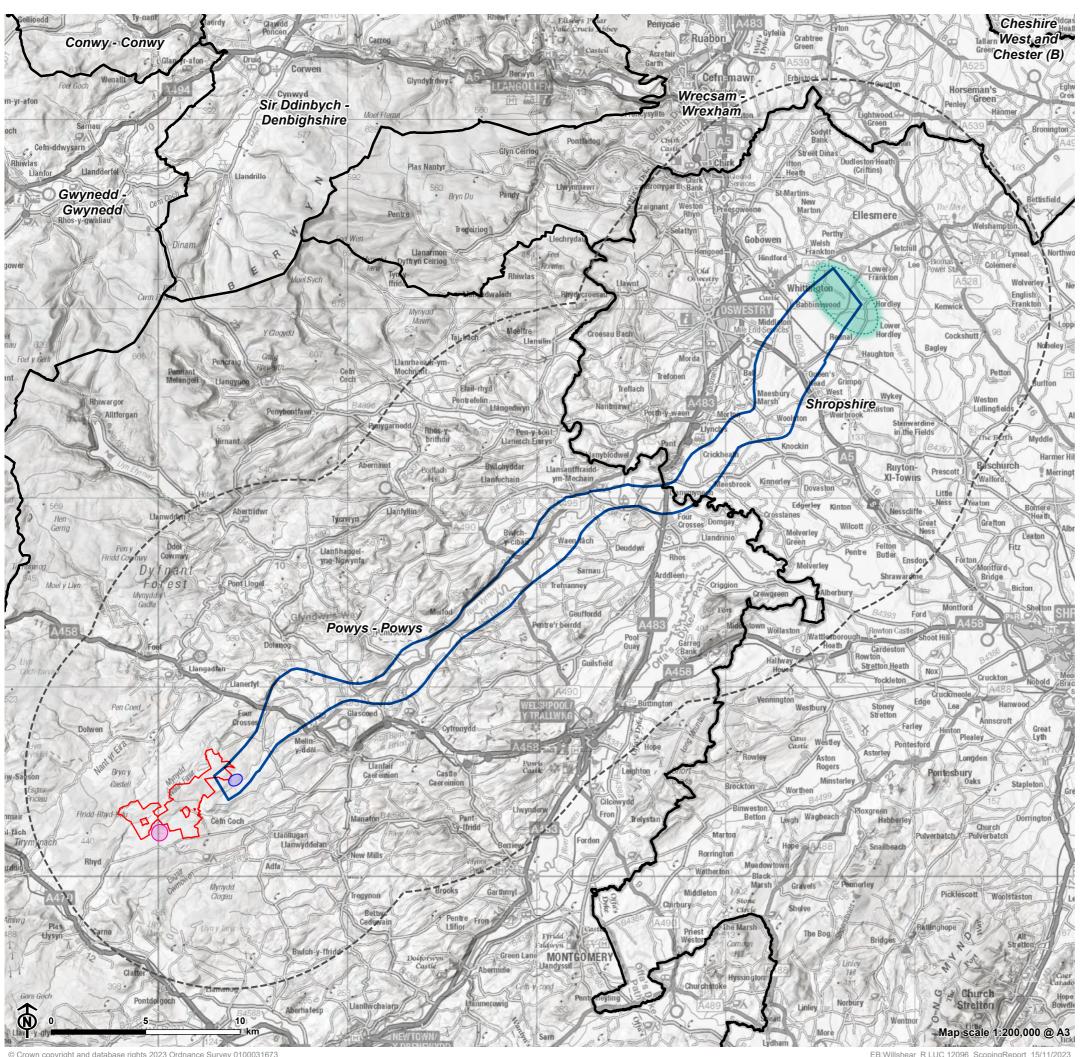
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with it are

Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn mewn camgymeriad, dylech hysbysu'r person a anfonodd yr e-bost ar unwaith. Hefyd, sylwer nad oes unrhyw sicrwydd nad yw'r e-bost hwn neu unrhyw ymgysylltiad yn rhydd o firws ac nad yw chwaith wedi'i ryng-gipio na'i newid



Green GEN Vyrnwy Frankton Routeing and Consultation Document for Green GEN Cymru



Figure 9.1: Study Area

Scoping Corridor
Ornithology Study Area (10km from Scoping Corridor)
Llyn Lort Energy Park
Search Area for National Grid Substation (Not included in project)
Preferred Collector Substation Search Area
Preferred Cable Sealing End Compound (CSEC)
Search Area
Local Authority Boundary

From: Grace Lewis
To: Vyrnwy to Frankton

Subject: EN020035-000009 - Green GEN Vyrnwy Frankton Project

Date: 16 February 2024 12:17:12

Attachments: <u>image001.png</u>

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OFFICIAL



Network Rail 1st Floor Bristol Temple Point Bristol BS1 6NL

My Ref: P/TP24/14

Your Ref: EN020035-000009

Date: 16 February 2024

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: EN020035-000009

PROPOSAL: (DCO) 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 LOCATION:

Dear Sir/Madam,

Thank you for your email dated **24 January 2024** together with the opportunity to comment on this proposal.

Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests, will need to be carefully considered.

Impact on Network Rail Infrastructure

Network Rail has been reviewing the information to date and at this stage it is not sufficiently detailed to fully assess potential impacts of the scheme on the railway and further information will be required to properly respond on the likely impacts of the proposed scheme.

The report states in Paragraph 11.6 that there is one area whereby railway interacts with the project. Para 3.36 proposes trenchless installation of cables (i.e. those involving no open

excavations) for crossing rivers, roads and railways and any other feature where engineering requirements prevent open excavation. Network Rail will require further details relating to this depth of the cabling prior to any installation. The construction of the underground cables in this area may have an impact on the operational railway, which Network Rail will need to consider in full.

Noise and Vibration

The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of Planning Policy Wales and Technical Advice Notes which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

Drainage

Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage does not show up on Buried service checks.

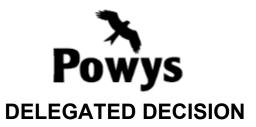
Traffic and Transport

During and post construction phase it is not clear whether transport or pedestrian routes will include those that cross a level crossing. Network Rail's position is that there shouldn't be any increase or change in usage to Level Crossings may require appropriate mitigation. The submitted transport assessment should include an assessment of any level crossing used during the construction of the proposed development and future access routes to the site.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
E @networkrail.co.uk
www.networkrail.co.uk/property



Powys County Council Constitution Schedule 13 Responsibility for Functions

Application 24/0111/PRL **Grid Ref:** E: Number:

Community Valid Date: 24/01/2024

Council:

Case Richard Edwards

Officer:

Applicant: Todd Brumwell The Planning Inspectorate

Location: Land Between Proposed Llyn Lort Energy Park West Of Welshpool Heading

North East Direction To Existing NETS Network In Shropshire

Proposal: EN050035 - Green Gen Vyrnwy Frankton Project - EIA Scoping Notification

and Reg 11 Notification

Application Type: Preliminary enquiry

Introduction

The Planning Inspectorate consulted Powys County Council local planning authority (the LPA) requesting the LPA's advice on the scope of the proposed EIA and the proposed methodologies outlined in the Scoping Report, in respect of the above proposed development. The LPA have considered the Scoping Request and offer the following comments.

The project will comprise of the following:

- New 132kV overhead electricity transmission line supported on L7 steel towers with an average
- Collector Substation
- Cable Sealing End Compound
- Approximately 5km of underground cable (to be routed through the proposed Llyn Lort Energy Park) to connect the Collector Substation to the Cable Sealing End Compound
- Temporary Works associated with the construction of the Project; and

- Potential diversion of third party utilities (where required).

The proposed development is located within Powys County Council (Wales), crossing into Shropshire (England), therefore comments will also need to be provided by Shropshire in respect of this Scoping Opinion.

- Planning Constraints

The interactive Constraints Map available at the following web link: Cyngor Sir Powys County Council – Local Plan: Powys LPA Constraints Map (opus4.co.uk) may be useful in identifying any key policy and designated site constraints. Please note that this data should NOT be relied on for legal purposes and may not be fully up to date with changes made to the constraints data in the County. The Council can accept no responsibility for any error or inaccuracy which may arise.

- Local Planning Policy

The adopted Powys Local Development Plan and associated suite of Supplementary Planning Guidance can be found at the following weblink: https://en.powys.gov.uk/article/4898/Adopted-LDP-2011---2026.

Historic Environment SPG and other relevant policy/guidance within the EIA and the other SPG's (e.g. Renewable Energy, Landscape, Biodiversity and Geodiversity) will be relevant the project.

The EIA Process and Assessment Methodology

Q6.1

PCC welcomes the topics scoped in.

Health and Wellbeing has been scoped out of the EIA as an individual topic chapter with information contained in appropriate chapters. Public rights of way make a significant contribution to the health and wellbeing of residents and visitors to Powys. This must be considered in the sections of text around health and wellbeing, whether incorporated into other chapters or forming a separate chapter in its own right. It would be preferable if Health and Wellbeing was an individual topic chapter, however it is agreed that information must be included within relevant chapters if not included as a separate topic.

Climate Change has been scoped out of the EIA and PCC has no comments in this respect.

Major Accidents and Disasters has scoped out of the EIA and PCC has no comments in this respect.

Decommissioning has been scoped out of the EIA but should be considered in relevant chapters.

EMFs Information is to be prepared and submitted as a separate document with the application but scoped out of the EIA and PCC has no comments this respect.

Socio-Economics has been scoped out of the EIA and PCC has no comments in this respect.

Chapter 7 – Landscape and Visual Amenity

PCC has no comments to make in respect of questions Q7.1 to Q7.7.

Chapter 8 – Ecology

Q8.1: Study area needs to include areas of transport route that will be impacted in order to establish the development.

PCC has no comments to make in respect of Q8.2 and Q8.4.

Q8.3: Consideration of species and habitats identified within the PNRAP would ensure locally important species and habitats can be appropriately accounted for and for net biodiversity loss of these species and habitats to be avoided, The Powys Nature Recovery Action Plan is available at the following link: https://en.powys.gov.uk/article/2573/Powys-Nature-Recovery-Action-Plan

Chapter 9 – Ornithology

PCC has no comments to make in respect of questions Q9.1 to Q9.3

Chapter 10 – Historic Environment

Clwyd Powys Archaeological Trust should be consulted on the proposal.

Otherwise PCC has no further comments to make in respect of Q10.1 to Q10.5.

PCC Conservation Areas Supplementary Planning Guidance should be considered.

Chapter 11 – Traffic and Transport

PCC has no comments in respect of Q11.1 and Q11.2.

Chapter 12 – Noise and Vibration

PCC has no further comments in respect of Q12.1 and Q12.2.

Chapter 13 – Water Resources

PCC has no comments in respect of Q13.1 to Q13.3

Chapter 14 – Ground Conditions, Geology and Hydrogeology

PCC has no comments in respect of Q14.1 to Q14.3

Chapter 15 – Soils and Agriculture

PCC has no comments in respect of Q15.1

Chapter 16 – Air Quality

PCC has no comments in respect of Q16.1

Chapter 17 – Cumulative Effects

PCC has no comments in respect of Q17.1

From: Asset.Protection

To: Vyrnwy to Frankton

Subject: FW: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation J-240125-

23315

Date: 06 February 2024 10:25:02

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ST Classification: UNMARKED

To whom it may concern

With regards to the attached consultation, we do not have any comments at this stage.

Kind regards Anna Cheung

Asset Protection
Asset Strategy & Planning
Chief Engineer



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From: <u>Edwards, Steven</u>
To: <u>Vyrnwy to Frankton</u>

Subject: RE: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation (email 1 of

2)

Date: 16 February 2024 18:31:09

Attachments: <u>image003.png</u>

image004.pnq image005.pnq image006.pnq image007.pnq image008.pnq SPM UMV Plan 1.pdf

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Thank you for the opportunity to comment on the information made available as part of the recent EIA scoping consultation for the above project.

I have reviewed the proposals and provide comments for SP Energy Networks (SPEN) who operate and manage the electricity network up to 132kV in the area affected by the proposals on behalf of the asset owner, SP Manweb, as shown on the attached plans. SP Manweb is the statutory licence Distribution Network Operator, and has the following observations on the Green Gen Cymru Scoping Report.

SP Energy Networks must ensure the avoidance of any adverse impact on its existing and future assets as we drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. The next decade will be crucial in preparing the grid for these changes and this is why we are interested in commenting on the proposals.

SP Energy Networks requires reference to existing SPM network and assessment of the impact of the proposals on this network. This is critical national infrastructure that must not be adversely impacted on. There should be a draft construction management plan which has a section on utilities and explains how impact on the existing network is to be managed and mitigated. SPEN requires there to be adequate space to maintain and operate its network in accordance with statutory obligations. Mitigation proposals will also need to take account of SPM assets and the operational requirements.

In addition, SPM benefits from numerous land rights interests across the proposed site and these must be maintained for SPM to manage and operate a safe and reliable network and these rights should be included in protective provisions.

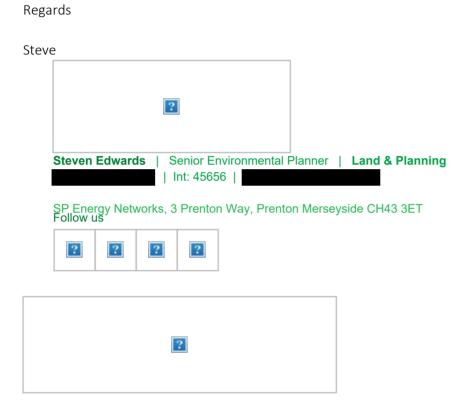
The applicant should contact SPEN using the above email address to obtain information on the existing and future electricity networks in the EIA Scoping study area in order to protect existing and future network supply in the area. This includes the SPEN 132kV Mid Wales Connections Project listed in the Planning Inspectorate Programme of Projects. SPEN is working closely with National Grid Electricity Transmission (NGET) on progressing these proposals in the context of a whole system design.

SPEN and NGET have jointly raised the importance of a whole system design with the applicant and continue to express a desire to work together at the pre-application stages on a whole system design which is necessary to manage the demand and generation through a coordinated approach providing suitable capacity and minimising impacts. A significant part of this work is the Pathway to 2030 Holistic Network Design document published in 2022. In addition, the

Future Wales National Plan 2040 notes new strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impacts and transition to a multi vector grid network.

Overall, shared collaborative working is welcomed. SPEN will continue to review the proposals and may raise further matters in due course.

I hope the above information is useful and please let me know if you require any further information.

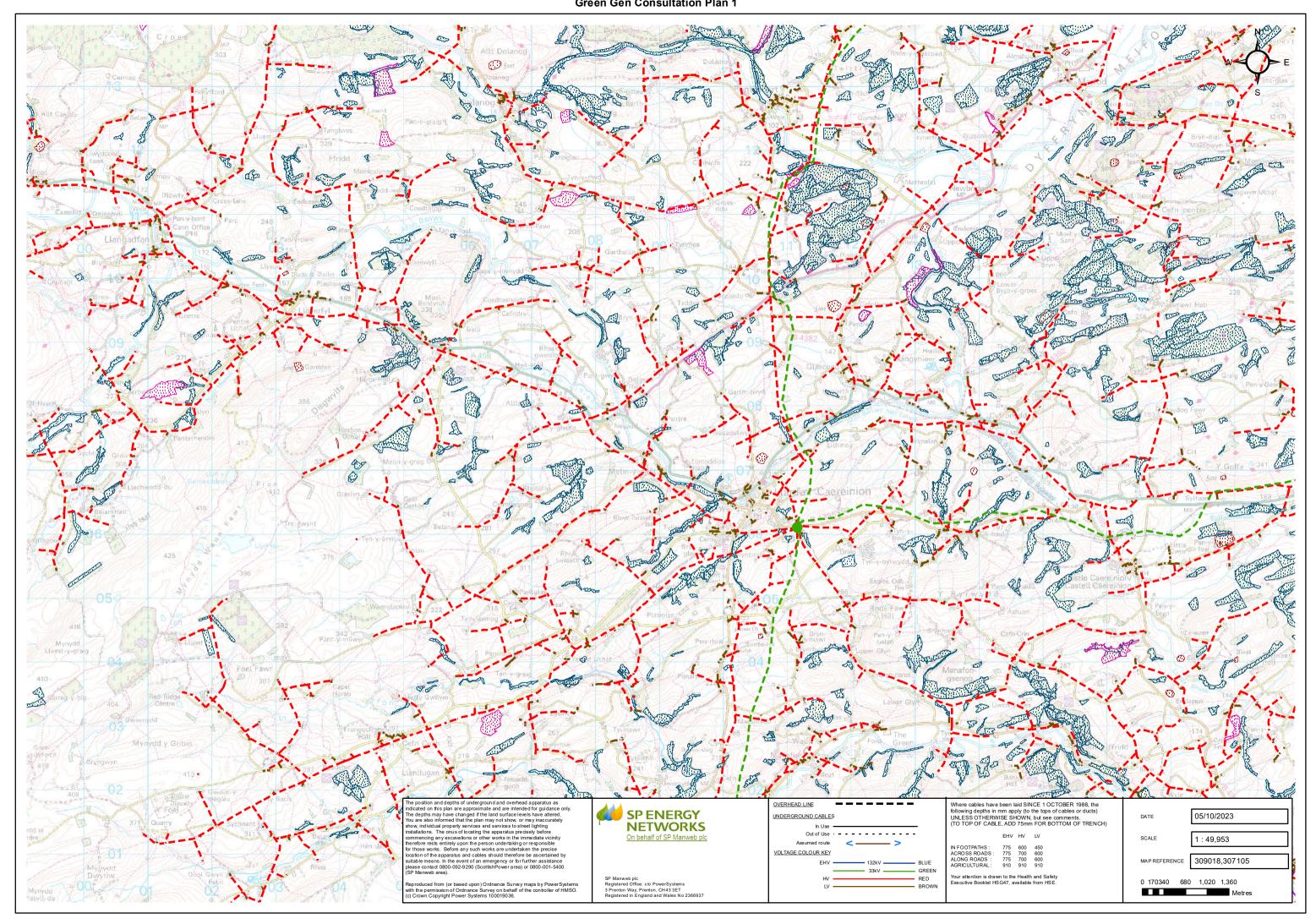


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From: Edwards, Steven
To: Vyrnwy to Frankton
Cc: Planningsouth

Subject: RE: RE: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation (email

2 of 2)

Date: 16 February 2024 18:29:44

Attachments: image001.png image002.png

image002.phg image004.phg image005.phg image006.phg SPM UMV Plan 2.pdf SPM UMV Plan 3.pdf

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Plans 2 and 3 attached.

Internal Use

From: Edwards, Steven

Sent: 16 February 2024 18:23

To: 'Vyrnwy to Frankton' <vyrnwytofrankton@planninginspectorate.gov.uk>

Subject: RE: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and

Consultation (email 1 of 2)

Thank you for the opportunity to comment on the information made available as part of the recent EIA scoping consultation for the above project.

I have reviewed the proposals and provide comments for SP Energy Networks (SPEN) who operate and manage the electricity network up to 132kV in the area affected by the proposals on behalf of the asset owner, SP Manweb, as shown on the attached plans. SP Manweb is the statutory licence Distribution Network Operator, and has the following observations on the Green Gen Cymru Scoping Report.

SP Energy Networks must ensure the avoidance of any adverse impact on its existing and future assets as we drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. The next decade will be crucial in preparing the grid for these changes and this is why we are interested in commenting on the proposals.

SP Energy Networks requires reference to existing SPM network and assessment of the impact of the proposals on this network. This is critical national infrastructure that must not be adversely impacted on. There should be a draft construction management plan which has a section on utilities and explains how impact on the existing network is to be managed and mitigated. SPEN requires there to be adequate space to maintain and operate its network in accordance with statutory obligations. Mitigation proposals will also need to take account of SPM assets and the operational requirements.

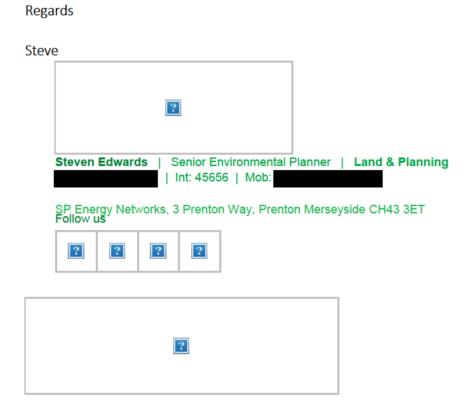
In addition, SPM benefits from numerous land rights interests across the proposed site and these must be maintained for SPM to manage and operate a safe and reliable network and these rights should be included in protective provisions.

The applicant should contact SPEN using the above email address to obtain information on the existing and future electricity networks in the EIA Scoping study area in order to protect existing and future network supply in the area. This includes the SPEN 132kV Mid Wales Connections Project listed in the Planning Inspectorate Programme of Projects. SPEN is working closely with National Grid Electricity Transmission (NGET) on progressing these proposals in the context of a whole system design.

SPEN and NGET have jointly raised the importance of a whole system design with the applicant and continue to express a desire to work together at the pre-application stages on a whole system design which is necessary to manage the demand and generation through a coordinated approach providing suitable capacity and minimising impacts. A significant part of this work is the Pathway to 2030 Holistic Network Design document published in 2022. In addition, the Future Wales National Plan 2040 notes new strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impacts and transition to a multi vector grid network.

Overall, shared collaborative working is welcomed. SPEN will continue to review the proposals and may raise further matters in due course.

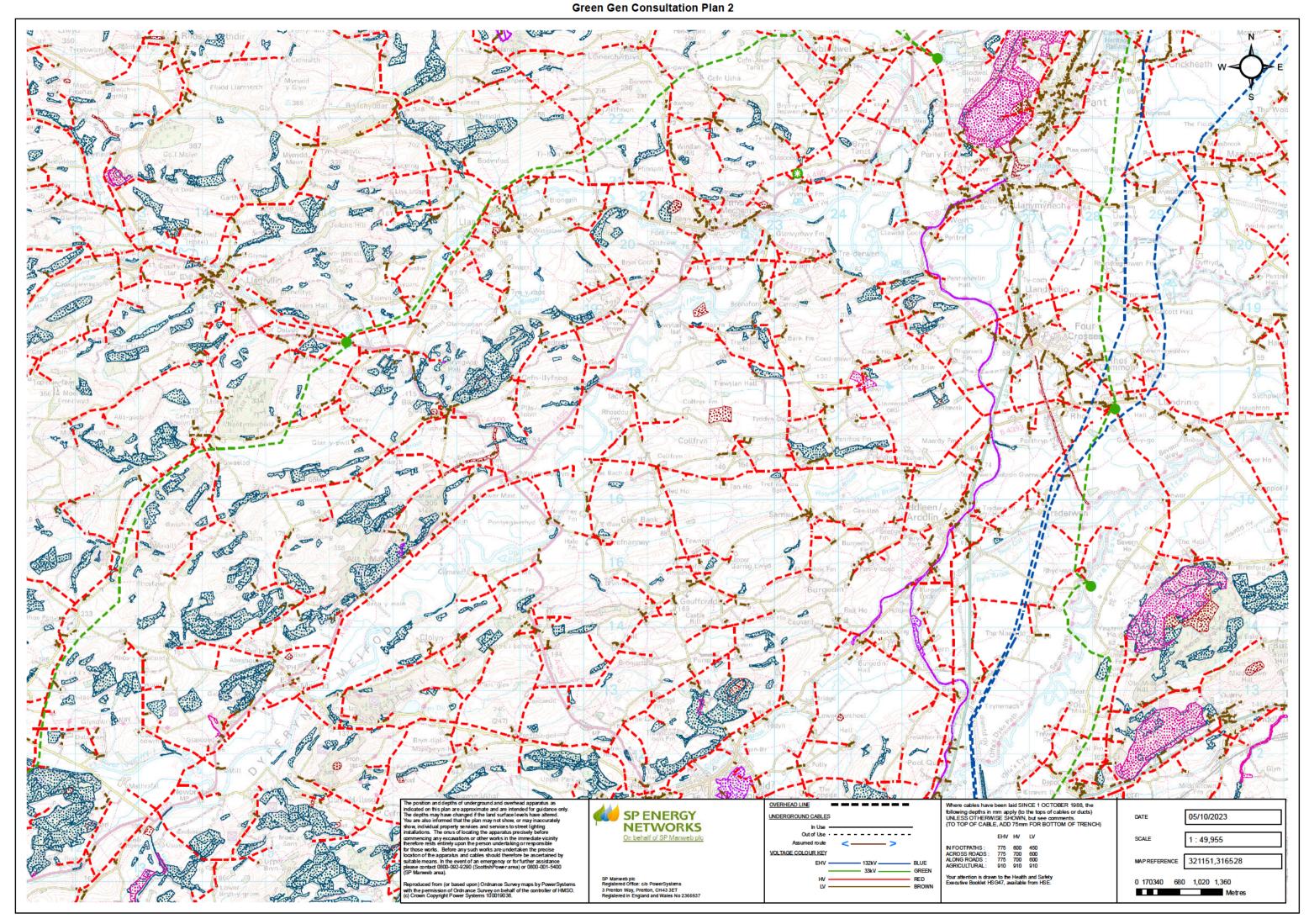
I hope the above information is useful and please let me know if you require any further information.

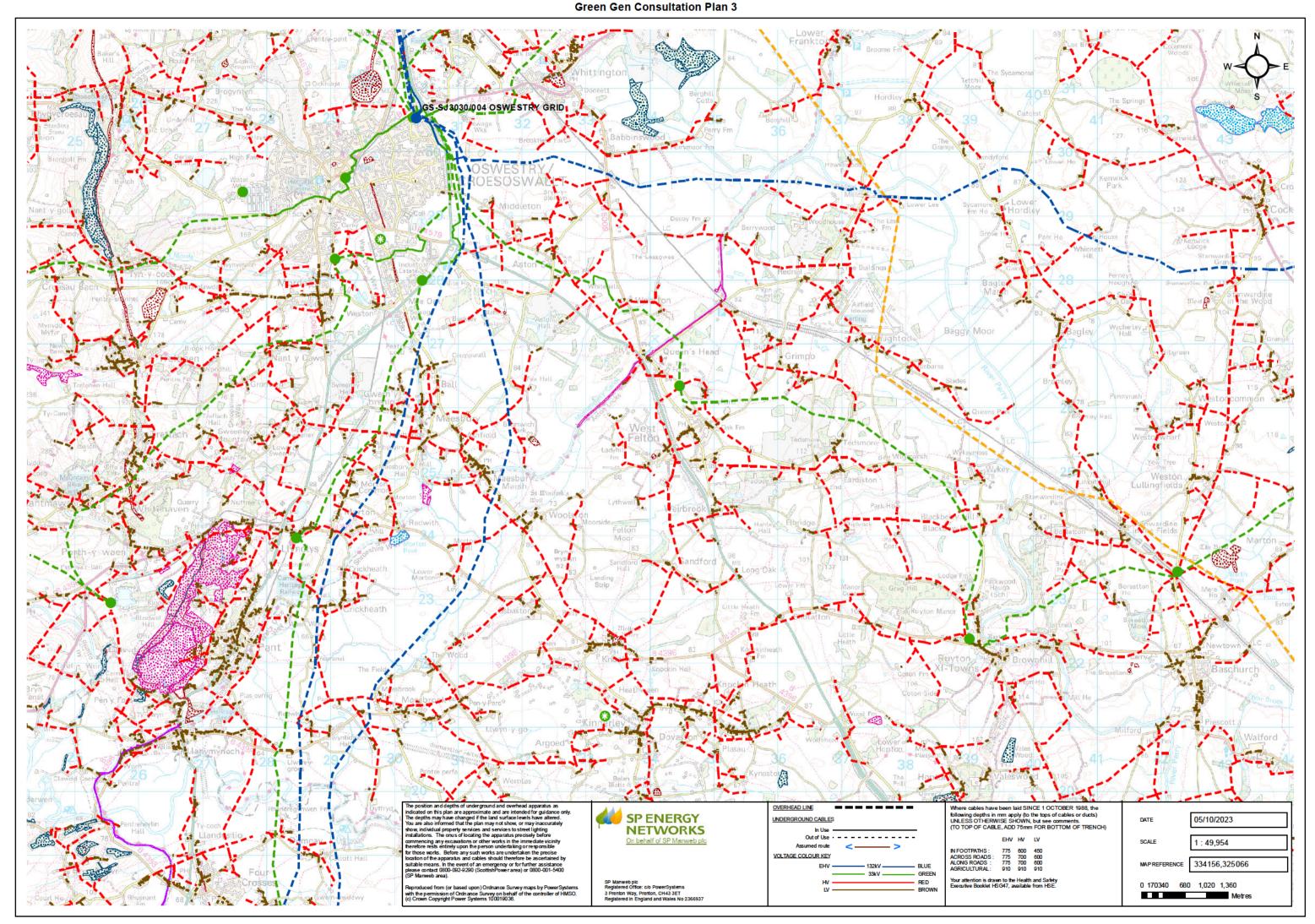


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 From:
 Richard Wood

 To:
 Vyrnwy to Frankton

 Cc:
 John Holmes; Ed Handley

Subject: FW: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 08 February 2024 15:59:46

Attachments: image001.png

image002.pnq image004.pnq image005.pnq image006.pnq image003.pnq ~WRD1052.jpq

GGVF - Letter to stat cons Scoping & Reg 11 Notification.pdf

Stafford Borough Council-Attachment-Warning.txt

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Dear Mr Brumwell

Thank you for your email and attached letter giving Stafford Borough Council the opportunity to comment on the Scoping Opinion for the above project.

In consideration of the nature and location of the proposal Stafford Borough Council wishes to provide a no comment response.

Regards

Richard Wood

From: Vyrnwy to Frankton <<u>vyrnwytofrankton@planninginspectorate.gov.uk</u>>

Sent: Wednesday, January 24, 2024 11:47 AM

Subject: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and

Consultation

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PLEASE NOTE: This email is from an infrequent correspondent.

Dear Sir/Madam,

We are contacting you at this time in relation to the Green GEN Vyrnwy Frankton Project which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the preapplication stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant 'consultation bodies' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is 21 February 2024 and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

- Overview of the NSIP Planning Process
- Information on the stages, services and participation in NSIP planning
- FAQs relating to the Scoping process
- Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment (HRA), etc.
- Information on legislation, guidance, and National Policy Statements (NPSs) The relevant legal framework and regulations include:

- The Planning Act 2008
- <u>The Infrastructure Planning (Environmental Impact Assessment) Regulations</u> (2017)
- Infrastructure Planning (Applications: Prescribed Forms and Procedure)
 Regulations 2009

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Annwyl Syr/Fadam,

Rydym yn cysylltu â chi yn awr ynglŷn â Green GEN Vyrnwy Frankton Project sy'n Brosiect Seilwaith o Arwyddocâd Cenedlaethol (NSIP). Diffinnir NSIPau yn Rhan 3, Rheoliad 14 Deddf Cynllunio 2008, ac maen nhw'n brosiectau o fathau penodol, dros faint penodol, y mae'r Llywodraeth o'r farn eu bod mor fawr a phwysig yn genedlaethol fel bod angen i ganiatâd i'w hadeiladu gael ei roi ar lefel genedlaethol, gan Ysgrifennydd Gwladol cyfrifol. Mae crynodeb o'r broses gynllunio NSIP ar gael yn y rhestr o ddolenni ar waelod y dudalen hon. Mae'r prosiect hwn ar y cam cyn-ymgeisio ar hyn o bryd.

Er mwyn bodloni gofynion Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) (EIA) 2017 ("y Rheoliadau EIA"), mae'n ofynnol i NSIPau sy'n debygol o gael effaith arwyddocaol ar yr amgylchedd gynnal EIA a darparu Datganiad

Amgylcheddol i gyd-fynd â'r cais. Bydd Datganiad Amgylcheddol yn amlinellu effeithiau posibl ac effeithiau arwyddocaol tebygol y Datblygiad Arfaethedig ar yr amgylchedd. Mae Atodlen 4 y Rheoliadau EIA yn amlinellu gwybodaeth gyffredinol i'w chynnwys mewn Datganiad Amgylcheddol. Mae rhagor o fanylion am ddogfennau Datganiad Amgylcheddol a'r broses EIA yn y dolenni ar waelod y dudalen hon.

Er mwyn llywio cwmpas y wybodaeth sydd i'w darparu yn y Datganiad Amgylcheddol a faint o fanylion i'w cynnwys, mae'r Ymgeisydd wedi gofyn am Farn Gwmpasu gan yr Arolygiaeth Gynllunio, ar ran yr Ysgrifennydd Gwladol o dan Reoliad 10 y Rheoliadau EIA.

Cyn mabwysiadu Barn Gwmpasu, mae'n rhaid i'r Arolygiaeth ymgynghori â'r 'cyrff ymgynghori' perthnasol a ddiffinnir yn Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009 (gweler y ddolen isod). Rydych wedi cael eich nodi'n gorff ymgynghori ar gyfer y prosiect hwn; gweler yr ohebiaeth atodedig. Mae Awdurdodau Cynllunio Lleol a Chynghorau Plwyf/Tref yn cyflawni rôl bwysig yn y broses gynllunio trwy ddarparu gwybodaeth benodol am yr ardal a chynrychioli cymunedau lleol. Mae'n rhaid i'r Ymgeisydd ystyried sylwadau a wnaed yn y Farn Gwmpasu oherwydd bod rhaid i'r Datganiad Amgylcheddol gael ei seilio ar y Farn Gwmpasu a fabwysiadwyd yn fwyaf diweddar. Felly, mae eich sylwadau ar y cam hwn yn werthfawr wrth ddylanwadu ar gwmpas y Datganiad Amgylcheddol trwy adolygu ymagwedd yr Ymgeisydd at EIA, fel yr amlinellir yn ei Adroddiad Cwmpasu. Sylwch fod yr ymgynghoriad hwn yn ymwneud â'r Broses Gwmpasu EIA yn unig. Fe'ch sicrheir y bydd cyfleoedd pellach i chi ymgysylltu â'r prosiect a rhoi safbwyntiau arno yn fwy cyffredinol, gan gynnwys trwy ymgynghoriad yr Ymgeisydd ei hun. Mae gan ymgeiswyr ddyletswydd i gynnal ymgynghoriad statudol ac mae'n ofynnol iddynt ystyried yr holl ymatebion i'w hymgynghoriad statudol.

Sylwch mai'r dyddiad cau ar gyfer ymatebion ymgynghori yw 21 Chwefror 2024. Dyddiad cau statudol yw hwn na ellir ei ymestyn. Bydd ymatebion a gyflwynir cyn y dyddiad cau yn cael eu hystyried, a'u cyhoeddi ar ddiwedd y Farn Gwmpasu, gan yr Arolygiaeth Gynllunio.

I gael rhagor o wybodaeth am y broses gynllunio NSIP, cliciwch ar y dolenni isod:

- Trosolwg o'r Broses Gynllunio NSIP
- Gwybodaeth am gamau, gwasanaethau a chyfranogi mewn cynllunio NSIP
- Cwestiynau Cyffredin yn ymwneud â'r Broses Gwmpasu
- Gwybodaeth yn ymwneud â materion penodol o fewn y broses gynllunio, e.e. rôl awdurdodau lleol, adroddiadau ar yr effaith leol, y Broses EIA, Asesiad Rheoliadau Cvnefinoedd (HRA), ac ati
- Gwybodaeth am ddeddfwriaeth, canllawiau, a Datganiadau Polisi Cenedlaethol (NPSau)

Mae'r fframwaith cyfreithiol a'r rheoliadau perthnasol yn cynnwys:

- Deddf Cynllunio 2008
- Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017
- Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009

Os oes gennych unrhyw gwestiynau ynglŷn ag unrhyw ran o'r wybodaeth hon, mae croeso i chi gysylltu â ni trwy ymateb i'r cyfeiriad e-bost hwn.

Kind regards,

Todd Brumwell



Todd Brumwell | EIA Advisor

The Planning Inspectorate T 0303 444 5348



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Environmental Hazards and Emergencies Department (Wales)
Cardiff Metropolitan University
Western Avenue
Cardiff, CF5 2YB

nsipconsultations@ukhsa.gov.uk www.gov.uk/ukhsa

Your Ref: Our Ref: 65206

The Planning Inspectorate Environmental Services Operations Group 3 Temple Quay House 2 The Square Bristol, BS1 6PN

8th February 2024

Dear Sir/Madam

Nationally Significant Infrastructure Project
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 Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the consultation documents, we do not have any specific comments at this stage. However, UKHSA requests that the proposer confirms either that the project does not contain any EMF sources that have a potential health impact; or that a health impact assessment is carried out in the Environmental Statement (ES).

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA's predecessor organisation Public Health England (PHE) produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

It should be noted that Public Health Wales (PHW) is the national public health agency in Wales who will take the lead in health and wellbeing considerations

We hope the information provided is useful and would welcome discussions to clarify any specific concerns or enquiries you may have.

Yours faithfully

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

1

https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

From: Amy Jones
To: Vyrnwy to Frankton

Subject: Re: EN020035 - Green GEN Vyrnwy Frankton Project - EIA Scoping Notification and Consultation

Date: 21 February 2024 19:51:06

Attachments: <u>image001.pnq</u>

image004.pnq image005.pnq image006.pnq image003.pnq

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Re: Green Gen Vyrnwy Frankton Connection Application Scoping Opinion Consultation Response from Whittington Parish Council

Whittington Parish Council wishes to echo the points raised by Llanymynech and Pant Parish Council in their submission on 16th February, as laid out below.

In summary, Whittington Parish Council wishes to make the following comments in response to the consultation:

- There should have been a consultation event held in the Parish of Whittington.
- The line should be below ground and there is no technical reason for it being overground.
- The line is in the wrong place.

Llanymynech and Pant's response has been copied below:

Necessity for this Project

The applicant states in their own literature that this project is about **Welsh power for Welsh people** so why is this even coming into England at all?

We have not seen anything from the applicant that properly looks at alternatives to pylons, and they rule out undergrounding too easily. They also have not looked at the "whole grid", just their requirement to get power out of Wales, not get any power into Wales or distributed along the way. This contravenes the Electricity Act 1989 as it's not "efficient and effective".

Surely the better approach would be to join up all the new wind farms and join the grid in North and South Wales. An even better approach would be to build a connection to the sea around Aberystwyth and have a subsea connection to the national Grid, again in North or South Wales.

The applicant has also acknowledged that the current route was designed in office with no attempt at a survey, site visit or real look at the impact on homes and businesses - the old National Grid route was, while still undesirable, better researched, with significantly less impact.

The previous attempt by National Grid to build a pylon run down the Vyrnwy Valley and through North Shropshire failed. Based on pylons, and with large stretches under-grounded, it was eventually rejected and did not proceed, even though it was better researched, and more account taken of the actual route. The environmental impact and the effect on rural lives and businesses, not to mention the public outcry at the time, caused the project to be discontinued.

Why should the applicant have a second go at something that failed previously? They have failed to

demonstrate a need now and precedent suggests it should, therefore, be rejected this time. Rushed through with undue haste, not well researched, with insufficient account taken of the impact on the environment, people and businesses, not to mention its likely gateway effect to further inappropriate development. How can the despoliation of so much of our precious rural landscape ever be justified when alternatives exist.

Risk of a Gateway Project

It is clear that the capacity of the route will only handle the applicant's own proposed wind farms. This does not make it a project of national significance but **a private line** as the National Grid will have no opportunity to use it. What happens when the current route **reaches capacity** if more capacity is needed? More wind farms are already planned in Wales. It is obvious that once the pylons are approved and the route established bigger, more pylons would be approved with little chance to prevent this.

Alternatives Dismissed Out of Hand

When questioned the applicant has dismissed any notion of taking the scheme **underground**. Digging is perfectly feasible, and is the default option in most of Europe, and as a result has significantly come down in price. Why will the applicant not consider it to protect fragile countryside and environments and people's lives and livelihoods - no impact assessment has been done on the latter either and the recent 'consultation' ignored many of these concerns.

Tunnels would futureproof capacity, upgrades and provide facilities for other utilities. National Grid has the equipment, but this requires a much more joined up and mature approach to energy infrastructure in the UK, and this is lacking. Tunnels and digging can be dug underneath field drains and rivers, alleviating farmers' concerns, and not so long ago a gas pipeline was laid across Wales from Milford Haven, entirely underground, and you cannot see where it was placed now.

A second option for connectivity in Wales at Trawsfynedd. It has been confirmed that all the National Grid infrastructure is still in place. The applicant has refused to discuss it as an option citing National Park restrictions. This ignores the fact that digging under National Parks is a matter of fact in other areas, see New Forest, Lake District etc. Therefore, if Scottish Power can dig cables under Barmouth Estuary almost any could be possible This is achievable if there is the will. For example, Denmark will be undergrounding all their cable infrastructure by 2040.

See Denmark Goes Underground

See **Snowdonia Project**

Health Implications

Health and safety is a key consideration if these things are so close to homes. There has been much research on this, particularly in Europe, with disturbing findings on the implications for the health and wellbeing of people living near power lines. It is not acceptable to expose anyone to these risks.

Helen Morgan MP recently visited the area and met with residents. She said, "why should rural communities have to be forced to accept things that would not be tolerated in more urban environments, we are not second-class citizens".

It should also be acknowledged that there is a significant mental health impact of this whole process on residents and the long-term anxiety that living with noise and fear of induced illness will engender.

Health issues associated with Power Transmission are well known.

Montgomery Canal Restoration Project, Tourism and Jobs

Millions of pounds and tens of thousands of hours have been poured into restoring the canal and supporting the cultural heritage of the canal and the additional jobs and boost to the economy that restoration will provide. Restoration is critical to ensure the sustainable long-term future of the canal with tourism revenues essential to ensure the canal can be better managed and protected, saving it from falling into the disrepair that in turn would be harmful to the protected flora.

The special designation of the Montgomery Canal as a **Site of Special Scientific Interest** and as a **Special Area of Conservation** is a protected and fundamental pillar of the canal's restoration. Indeed, a special conservation plan agreed by over a dozen organisations including Powys County Council, Shropshire Council and Natural Resources Wales, which includes bringing more of the canal back to navigation, is a key part of securing both the canal's future and its protected environmental status.

National Trails and Nature Reserves

Another significant area of tourism are the Walkers of the **Glyndwr's Way** and **Offa's Dyke** and, both are designated as National Trails. Additionally, these routes link up with the **Llanymynech Rocks Nature Reserve** and walkers come from all over the world and spend money along the whole of the Welsh-English border and not just in Montgomeryshire or Shropshire. The applicants planned route cuts straight through these historic gems.

The planned route of this project will impact these areas and the prospect of tourism revenues immensely and must be considered.

Birds and Other Wildlife

The **Peregrine Falcon** is designated by Natural England as a Schedule 1 species, **Protected** in the UK under the Wildlife and Countryside Act, 1981, with the added legal protection that goes with that. To date the applicant has made no reference to the presence of these magnificent birds at **Llanymynech Rocks Nature Reserve**.

According to the records of the Shropshire Peregrine Group, an affiliate of the British Trust for ornithology, Llanymynech Rocks has been one of the most consistently successful peregrine nest sites out of fewer than 20 in Shropshire, with 20 successful breeding years producing 45 fully fledged chicks in the 27 years between 1988 and 2015. The risks of this fastest and most iconic of British raptors colliding with overhead wires while hunting the Vyrnwy Valley are evident. Indeed, the applicant's current planned route cuts straight through the acknowledged hunting grounds to the east, south and west of Llanymynech, the south and east of Pant, and south and west of Crickheath.

Trees and Hedgerows

It has been confirmed that in building a pylon run like this, the need for access will mean that miles of hedgerow will have to be grubbed up and any trees along the route felled. We enjoy a particularly mature range of oak trees in this region, also ancient hedgerows. Loss of these will have a major impact on wildlife and the environment, not to mention the carbon release generated as all that wood is burnt.

Defence and Aviation Industry

No consideration has been given to the dangers to aviation in this area which are very real. The present proposed route passes right through CAA recognised and designated hot-air balloon launch fields and will render them unusable. Secondly the area of North Shropshire and the Welsh Borders around Kinnerley, Crickheath, Pant and Llanymynech is a designated military aviation training area for RAF Shawbury helicopter activities. These lines would be a major hazard and almost certainly in breach of CAA regulation.

Failure to Listen

There is a concern that the applicant is going through the motions with this process and failing to listen to the concerns raised by those directly affected. The applicant is on record as dismissing the fact that the views and environment from and near residents' homes (and they are homes, not just properties) is of no value. As one of the applicant's representatives said: 'Well, you don't own the view, do you?' The applicant has also stated that no compensation will be paid to anyone living near power lines, this in spite of the fact that property and land values are directly affected by proximity to power lines - as much as a 20% devaluation.

When the applicant was asked if they had a plan B should their current proposals be rejected, they stated, 'We don't need a Plan B. The pylons will happen and the best you can hope for ever is to engage with the process to try and mitigate the impact on your community."

Treasury Green Book

The process of decision making should follow the **Treasury green book**. This therefore must be within the Scoping Opinion. It is understood from a recent barrister's report on a project in East Anglia that 'to not use the green book would be "incorrect in law".

The green book will require a **full valuation of natural capital** ... including the value of landscapes and scenery. While you don't own a view, you do enjoy visual amenity, which is covered by natural capital.

Adherence to the Holford Rules

The Holford Rules are a set of guidelines on overhead line routeing were first formulated in 1959 by Sir William, later Lord, Holford, who was a part-time member of the CEGB. National Grid has

reviewed these guidelines, known as the 'Holford Rules', and concluded that they have stood the test of time. National Grid therefore intends to continue to employ them as a basis of the company's approach to overhead line routeing. The applicant has failed to follow these rules in the planning of the proposed route.

On Wed, 24 Jan 2024 at 11:53, Vyrnwy to Frankton < <u>vyrnwytofrankton@planninginspectorate.gov.uk</u>> wrote:

Dear Sir/Madam,

We are contacting you at this time in relation to the Green GEN Vyrnwy Frankton Project which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the pre-application stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the

Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant 'consultation bodies' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is 21 February 2024 and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

- Overview of the NSIP Planning Process
- Information on the stages, services and participation in NSIP planning
- FAQs relating to the Scoping process
- Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment (HRA), etc.
- Information on legislation, guidance, and National Policy Statements (NPSs)

The relevant legal framework and regulations include:

- The Planning Act 2008
- The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017)
- Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Annwyl Syr/Fadam,

Rydym yn cysylltu â chi yn awr ynglŷn â Green GEN Vyrnwy Frankton Project sy'n Brosiect Seilwaith o Arwyddocâd Cenedlaethol (NSIP). Diffinnir NSIPau yn Rhan 3, Rheoliad 14 Deddf Cynllunio 2008, ac maen nhw'n brosiectau o fathau penodol, dros faint penodol, y mae'r Llywodraeth o'r farn eu bod mor fawr a phwysig yn genedlaethol fel bod angen i ganiatâd i'w hadeiladu gael ei roi ar lefel genedlaethol, gan Ysgrifennydd Gwladol cyfrifol. Mae crynodeb o'r broses gynllunio NSIP ar gael yn y rhestr o ddolenni ar waelod y dudalen hon. Mae'r prosiect hwn ar y cam cyn-ymgeisio ar hyn o bryd.

Er mwyn bodloni gofynion Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) (EIA) 2017 ("y Rheoliadau EIA"), mae'n ofynnol i NSIPau sy'n debygol o gael effaith arwyddocaol ar yr amgylchedd gynnal EIA a darparu Datganiad Amgylcheddol i gyd-fynd â'r cais. Bydd Datganiad Amgylcheddol yn amlinellu effeithiau posibl ac effeithiau arwyddocaol tebygol y Datblygiad Arfaethedig ar yr amgylchedd. Mae Atodlen 4 y Rheoliadau EIA yn amlinellu gwybodaeth gyffredinol i'w chynnwys mewn Datganiad Amgylcheddol. Mae rhagor o fanylion am ddogfennau Datganiad Amgylcheddol a'r broses EIA yn y dolenni ar waelod y dudalen hon.

Er mwyn llywio cwmpas y wybodaeth sydd i'w darparu yn y Datganiad Amgylcheddol a faint o fanylion i'w cynnwys, mae'r Ymgeisydd wedi gofyn am Farn Gwmpasu gan yr Arolygiaeth

Gynllunio, ar ran yr Ysgrifennydd Gwladol o dan Reoliad 10 y Rheoliadau EIA.

Cyn mabwysiadu Barn Gwmpasu, mae'n rhaid i'r Arolygiaeth ymgynghori â'r 'cyrff ymgynghori' perthnasol a ddiffinnir yn Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009 (gweler y ddolen isod). Rydych wedi cael eich nodi'n gorff ymgynghori ar gyfer y prosiect hwn; gweler yr ohebiaeth atodedig. Mae Awdurdodau Cynllunio Lleol a Chynghorau Plwyf/Tref yn cyflawni rôl bwysig yn y broses gynllunio trwy ddarparu gwybodaeth benodol am yr ardal a chynrychioli cymunedau lleol. Mae'n rhaid i'r Ymgeisydd ystyried sylwadau a wnaed yn y Farn Gwmpasu oherwydd bod rhaid i'r Datganiad Amgylcheddol gael ei seilio ar y Farn Gwmpasu a fabwysiadwyd yn fwyaf diweddar. Felly, mae eich sylwadau ar y cam hwn yn werthfawr wrth ddylanwadu ar gwmpas y Datganiad Amgylcheddol trwy adolygu ymagwedd yr Ymgeisydd at EIA, fel yr amlinellir yn ei Adroddiad Cwmpasu. Sylwch fod yr ymgynghoriad hwn yn ymwneud â'r Broses Gwmpasu EIA yn unig. Fe'ch sicrheir y bydd cyfleoedd pellach i chi ymgysylltu â'r prosiect a rhoi safbwyntiau arno yn fwy cyffredinol, gan gynnwys trwy ymgynghoriad yr Ymgeisydd ei hun. Mae gan ymgeiswyr ddyletswydd i gynnal ymgynghoriad statudol ac mae'n ofynnol iddynt ystyried yr holl ymatebion i'w hymgynghoriad statudol.

Sylwch mai'r dyddiad cau ar gyfer ymatebion ymgynghori yw 21 Chwefror 2024. Dyddiad cau statudol yw hwn na ellir ei ymestyn. Bydd ymatebion a gyflwynir cyn y dyddiad cau yn cael eu hystyried, a'u cyhoeddi ar ddiwedd y Farn Gwmpasu, gan yr Arolygiaeth Gynllunio.

I gael rhagor o wybodaeth am y broses gynllunio NSIP, cliciwch ar y dolenni isod:

- Trosolwg o'r Broses Gynllunio NSIP
- Gwybodaeth am gamau, gwasanaethau a chyfranogi mewn cynllunio NSIP
- Cwestiynau Cyffredin yn ymwneud â'r Broses Gwmpasu
- Gwybodaeth yn ymwneud â materion penodol o fewn y broses gynllunio, e.e. rôl awdurdodau lleol, adroddiadau ar yr effaith leol, y Broses EIA, Asesiad Rheoliadau Cynefinoedd (HRA), ac ati
- Gwybodaeth am ddeddfwriaeth, canllawiau, a Datganiadau Polisi Cenedlaethol (NPSau)

Mae'r fframwaith cyfreithiol a'r rheoliadau perthnasol yn cynnwys:

- Deddf Cvnllunio 2008
- Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017
- Rheoliadau Cynllunio Seilwaith (Ceisiadau: Ffurflenni a Gweithdrefn Ragnodedig) 2009

Os oes gennych unrhyw gwestiynau ynglŷn ag unrhyw ran o'r wybodaeth hon, mae croeso i chi gysylltu â ni trwy ymateb i'r cyfeiriad e-bost hwn.

Kind regards,

Todd Brumwell

Todd Brumwell | ElA Advisor

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Amy Jones

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