



## **CPRW Montgomeryshire Branch**

### **Response to National Grid's Mid Wales connection consultation**

January 2015

The Campaign for the Protection of Rural Wales (CPRW) and its Montgomeryshire Branch in particular, welcome the opportunity to respond to the latest stage of consultations on the proposed Transformer station and 400KV transmission line through Mid Wales. This submission reflects their joint views and agreed position.

CPRW would wish to make brief representation on a number of specific and generic points as a national landscape organisation with a clear local interest in the proposal. We see nothing in the amended proposals to remove our concerns regarding the industrialisation of a substantial corridor in unspoilt rural Montgomeryshire and maintain our position of objection in principle to this highly intrusive and visually damaging scheme.

Further, we would support the objections to the scheme made by CPRE with respect to the line as it passes through Shropshire.

#### **1. Specific points**

1.1 Although undergrounding has the potential to have a lesser long term effect on a landscape it is not without its issues for the environment and agricultural businesses in the vicinity. Additionally, the two end sealing compounds are particularly unsightly in the attractive valley setting and would have significant and unacceptable impact on visual amenity. As NG admit, there is only limited screening potential.

1.2 We further note that the amount of undergrounding proposed is relatively small given the total line length. CPRW questions the selection criteria for the 8 mile undergrounding proposal given the highly deleterious impacts that would inevitably be experienced at a number of other locations. To give just three examples:

a) The overhead transmission route will impact markedly on Bryn Mawr and Llanmynech Hill Forts, the Vrynwy Aqueduct and the Carreghofa Lock / Toll House (all Scheduled Ancient Monuments or Listed buildings). This is not only an area of high archaeological and historical interest it is an area whose economy is heavily reliant on tourism. There are also a number of villages nearby whose amenity would be severely affected.

b) The pylon line in the vicinity of Foel Fawr will skyline at a height of some 320m making it the dominant feature over long distances. This is an area of acknowledged high landscape value.

c) The appearance of the line in front of the scenic Moel Bentyrch will have a highly deleterious impact locally and on a major coastal tourist route.

1.3 CPRW would question whether there is indeed any amelioration to be achieved through the mixed use of lattice towers, low height lattice pylons and T pylons. Lower heights can make the overhead wires appear much nearer eye level in a view which

accentuates their negative impact. The broad and squat nature of the lower lattice also tends to increase the impact. The new Tpylon is untested and it is unknown how a whole line of them will impact. Tpylons may need to be placed at more frequent intervals than tower pylons; the supporting towers are massive (with the same issues as wind turbine towers) giving no visual permeability, and the stark white colour could increase visibility in certain lights. The general public may not be aware of the massiveness of the towers as there are no T-pylons currently built. Should Tpylons prove technically feasible they may in practice be perceived as even more obtrusive than standard pylons. CPRW do not believe that landscapes as sensitive as those in Mid Wales should be a trial ground.

1.4 CPRW recognises that NG have sought to identify the least-worst site for construction of the transformer station. However, it is highly unlikely that it can ever be completely screened from view by landforms given the height of the gantries and the area of the site. Even with some undergrounding into the Bryngwyn station, the upland situation will ensure the necessary conglomeration of transmission lines and pylons will be highly and incongruously conspicuous over a significant area. CPRW are particularly concerned that this impact will include parts of the Snowdonia National Park where views out are of as great an importance to the integrity and special qualities as the views inwards.

1.5 Given that the nature and scale of this range of impacts has yet to be fully assessed, in particular the impact of the route on areas of ancient woodland or other sites of ecological or historic importance, we fail to see how even the exiting proposals can be justified as the final route.

## **2. General Points and Principles**

2.1 It is uncertain if a 400KV line should even be considered. The Welsh Government have been clear (cf Griffith's Letter June 2012<sup>1</sup>) and preceding statement by First Minister Carwyn Jones) that the power aspirations for the SSAs should not be exceeded and that 400KV pylon lines and a transformer station are not acceptable in Mid Wales even up to the limit for the Strategic Search Areas of 740MW (430MW + 98MW +212MW).

2.2 Our view on this matter is reinforced by the recent withdrawal of the Nant y Moch and Dyfnant windfarms due to uncertainties over subsidy regimes. Further withdrawals of windfarms in scoping are possible and some, currently at the planning stage, may not receive approval or even secure the required investment. The need for such an over-engineered solution is thus highly questionable. It is clear that, once constructed, there would be an imperative to fill the hub capacity resulting in windfarms being 'noddled through' regardless of their wider environmental impact. We would therefore seriously challenge the business case for this premature connection proposal given that the capacity of known connection agreements for windfarms at 408.7MW is far below the 740MW figure at which the WG 400KV limit applies.

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<sup>1</sup> (former) Minister John Griffiths AM letter to Planning Officers July 2011

2.3 Windfarms have planning permission for 25 years but the transformer station and pylons will permanently deface otherwise pristine landscapes.

2.4 It seems perverse that NG have a programme to remove some pylons from valued landscapes but are persisting in erecting more. Will the public be required subsequently to pay for these to be undergrounded having already funded their erection? One of the frequent first actions in regeneration schemes<sup>2</sup> is the removal of disfiguring pylons.

2.5 CPRW finds it absurdly contradictory that a lovely, unspoilt and varied area of country with a stable and full employment economy is now faced with erection of pylons where none exist. NG very honestly state that erection and maintenance of the Hub and transmission lines will not create significant local employment. An overall loss of jobs is the corollary as tourism will inevitably suffer. The area blighted by the line is already seeing a loss of planned investment in tourism / outdoor leisure related developments<sup>3</sup> and serious depression of the housing market<sup>4</sup> since the announcement of the windfarms and connection projects. CPRW deplores the social and economic impact this will have on the many rural communities and interests affected by the proposal.

2.6 Mid Wales already has in excess of 260 constructed or consented wind turbines and the Area Network can accept no further power. The area has contributed significantly to the wind energy aspirations of the Welsh Government and the limit of sustainable development has been reached.

2.7 In summary CPRW does not support these infrastructure proposals but considers the imperative for the region to be the development of community energy schemes that do not require transmission infrastructure alongside permanent measures for energy conservation and use reduction. Landscapes do not have to be designated to be recognised as being of high visual and scenic quality.

2.8 We believe the current proposals by NG have nothing to offer Montgomeryshire and will bring only disbenefits to the area.

Your acknowledgement of receipt of this representation would be appreciated in due course

Yours faithfully

Christopher Fuller  
Chairman  
CPRW Montgomeryshire Branch CPRW

Peter Ogden  
Director

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<sup>2</sup> e.g. Lea Valley regeneration programme

<sup>3</sup> e.g. Oswestry Marina and holiday parks in the Llanymynech and Meifod areas

<sup>4</sup> Land Registry Report Dec 2014 showing continuing falls in house prices in the last quarter against national trends. Rightmove October 2014 Report showing that at an average of 113 days properties in Powys are taking the longest to sell in the UK.