Green GEN Cymru
Vyrnwy Frankton Project
2023 Non-statutory Consultation
Feedback Report

Contents

1 Executive summary

As the UK moves toward its net zero targets, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar. The electricity grid will also need to change to connect these new sources to homes and businesses.

In Mid Wales and Shropshire, the existing electricity network does not have the capacity to connect new renewables to homes and businesses.

To connect new energy generation in Mid Wales, Green Generation Energy Networks (Green GEN Cymru) is proposing a new collector substation and 132 kV connection to join the existing national electricity network near to Lower Frankton in Shropshire (the Project). The Project will see that the energy generated from new renewables can be used in homes and businesses, locally and nationally.

Proposed new 132kV overhead line projects that are more than 2km in length and are partly in England and partly in Wales are classified as Nationally Significant Infrastructure Projects (NSIPs).

Projects deemed to be NSIPs must apply to the Secretary of State for a Development Consent Order (DCO). Applications for a DCO are made to the Planning Inspectorate who will deal with the application on behalf of the Secretary of State. Ultimately, the decision whether to grant or refuse the order is made by the relevant Secretary of State. The process for applying for a DCO is set out in the Planning Act 2008 (the Act). [1]

As our current proposals are for an overhead line we are following this process. The consultation in autumn 2023 was the first in a two-stage process. The first consultation was non-statutory, and the second consultation will be a statutory consultation under section 42 of the Act. The second consultation will present more developed proposals and a preliminary environmental information report (PEIR).

The stage one consultation on the Green GEN Vyrnwy Frankton proposals took place from 6 September to 18 October 2023. The consultation was on:

- the proposed search area for the collector substation and cable sealing end compound in Powys

- the preferred route for the connection through Powys and Shropshire

In line with the guidance for pre-application consultation for NSIPs, Green GEN Cymru engaged with statutory and non-statutory stakeholders, local communities, and others who may have an interest in the Project. A dedicated lands team managed engagement with those with an interest in land affected by the proposals.

[1] https://www.gov.uk/guidance/planning-act-2008-content-of-a-development-consent-order-required-for-nationally-significant-infrastructure-projects

A range of consultation materials were made available providing an overview of the proposals. Community events and webinars were organised for people to talk to Green GEN Cymru's team and find out more. Hard copy and online feedback forms were provided, together with email, freepost and freephone channels. Digital copies of the documents produced are available online https://greengenvyrnwyfrankton.com/en/documents/.

The Project also completed a series of briefings with the local authorities in Shropshire and Powys, and with elected representatives in the Senedd, Westminster and local councils. A webinar was organised for community and parish councils.

Information was also sent to elected representatives and officers of Powys County Council and Shropshire Council.

In response to the consultation, 183 pieces of feedback were received. A feedback summary was published in February 2024 providing an overview of the key themes of the feedback, and the next steps.

Feedback to the consultation included comments on the effects of the preferred route on communities and place, both broadly and in relation to specific areas. Some responses requested specific changes to the preferred route with many also stating a preference for the connection to be placed underground. Feedback was also received about broad themes such as:

- environment
- landscape
- communities and properties
- the local economy, particularly
- agriculture and tourism
- electric and magnetic fields.

This report explains how the stage one consultation was delivered, the feedback received and how this is being taken into account.

The feedback received has informed Green GEN Cymru's further development of the Project. The Project team continues to consider all the feedback received as part of the development of the proposals.

2 About the Project

This report describes the first stage of consultation (non-statutory) on proposals for the Green GEN Cymru Vyrnwy Frankton Project (the 'Project') between Wednesday 6 September and Wednesday 18 October 2023.

It sets out the details of the consultation and a summary of the feedback received. It also sets out the methodology used to analyse the feedback, as well as how Green GEN Cymru is taking the feedback into account in the development of the proposals.

2.1 About Green GEN Cymru

Green GEN Cymru are working to develop a stronger, more resilient renewable electricity network – distributing clean, green energy to our homes, hospitals, schools, businesses, and communities.

As an Independent Distribution Network Operator[2] (IDNO) Green GEN Cymru's proposed network looks to unlock the country's' energy potential and support, accelerate and enable the net zero transition. New grid infrastructure is needed to strengthen energy resilience, add capacity to the local network, and help pave the way for the widespread rollout of green heating and electric vehicles.

The IDNO licence enables us to operate electricity distribution networks, supporting the growing demand for renewable energy in Wales and England, nationally and locally. As a regulated business, our distribution network can also allow direct connection for energy users such as businesses and public buildings and new energy generators such as community and other renewable projects.

We're playing a pivotal role in developing a robust and reliable distribution network that can help tackle the energy crisis, climate crisis, as well as the cost-of-living crisis, empowering rural communities through reducing the pressure on the existing grid.

We are committed to working closely with local communities and stakeholders as we develop our plans, to maximise the benefits and minimise the impacts for local people.

More information can be found on the Green GEN Cymru website www.greengencymru.com.

2.2 Project Background

Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from fossil-fuel and nuclear power stations. The existing electricity network in Mid Wales and Shropshire does not have the capacity to connect new renewable energy to homes and businesses, locally and nationally.

Both UK and Welsh Governments have set targets for more renewable energy generation, in response to climate change. As the nation moves away from fossil fuel-based energy generation,

[2] Green GEN Cymru holds a licence under section 6 of the Electricity Act 1989

new renewable energy generation will be located where it can capture sustainable sources like wind, tidal and solar. The electricity grid will also change to connect these new sources to homes and businesses

Green GEN Cymru has connection agreements with energy generators who are developing new onshore wind generation in Mid Wales. To connect these projects, Green GEN Cymru is proposing a new 132kV collector substation and 132 kV connection through the Vyrnwy Valley in Powys to connect to the existing electricity transmission network near to Lower Frankton in Shropshire.

Where Green GEN Cymru connects to the national electricity network, National Grid Electricity Transmission (NGET) as owners of that network, would need to develop a substation to receive the 132 kV connection. The design, development and consent of that substation will be managed by National Grid and is separate to this project.

Green GEN Cymru will build a new 132 kV switching station close to the 400 kV substation to make the connection safe and secure.

2.3 Overview of how the proposals were developed

Approach to Routeing Grid infrastructure in Wales
Green GEN Cymru has published a document titled 'Approach to Routeing Across England and Wales'. This document sets out how Green GEN Cymru will develop grid projects including those likely to be Nationally Significant Infrastructure Projects (NSIPs). It includes a routeing methodology and an approach to Environmental Impact Assessment (EIA) for projects.

The purpose of this document is to provide stakeholders and consultees with clarity on how projects will be developed and to ensure consistency in how Green GEN Cymru develops projects.

The Project has been developed in accordance with this approach.

Options appraisal
An options appraisal process was undertaken to identify the proposals to take forward as part of the Project. This was undertaken in two parts:

- An appraisal of the grid connection options – detailed in the *Green GEN Phase Two Grid Connection Strategy* – involved identifying, comparing and assessing potential options, within broad geographical zones, for connecting proposed energy parks into both new and existing substations in Wales and England. Each option was reviewed against how they performed on environmental, technical and cost grounds. This document concluded that the preferred option is to connect at a point on the existing 400kV transmission network at a location near to Lower Frankton in Shropshire. Connection would be made through a new 400kV substation to be developed by National Grid.

- An assessment of route options – detailed in the *Vyrnwy Frankton Routeing and Consultation Report* - involved the identification and appraisal of locations for a collector substation in the Powys uplands and corridors for a new overhead line. A preferred search area for the collector substation was identified near to Cefn Coch in Powys and a preferred route corridor was

identified through the Vyrnwy Valley and Shropshire. Following this, route options for an overhead line of steel lattice pylons with a standard height of 27m were identified within the route corridor. These route options were assessed against a range of criteria to identify which offered the best option to balance potential effects. Through this a preferred route – approximately 200m wide – was chosen. The aim of the first round of (non-statutory) consultation was to present the work undertaken on developing the options and to seek community and stakeholder feedback on the proposed collector substation search area and preferred route.

3 Approach to Consultation

Green GEN Cymru attaches great importance to the effect that its work may have on the environment and local communities. Green GEN Cymru is committed to providing clear and up-to-date information on its proposals, and consulting those affected so their views can help to shape Green GEN Cymru's proposals before consent applications are submitted.

In developing an approach to consultation, Green GEN Cymru has considered government guidance[3] on the pre-application process for NSIPs. Amongst other points, this guidance notes:

"Effective pre-application consultation will lead to applications which are better developed and better understood by the public" and "that consultation is appropriate to the scale and nature of the project and where its impacts will be experienced"

and

"To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time, consultees will need sufficient information on a project to be able to recognise and understand the impacts."

In view of this guidance Green GEN Cymru's approach to engagement for the Project is to carry out a minimum of two stages of consultation with communities and stakeholders.

- stage one non-statutory consultation on the work done to date to develop the Project and specifically the proposed collector substation search area and preferred route, allowing communities to comment on and shape the proposals in the early stages of development;

- stage two statutory consultation on an indicative collector substation design, underground cable, cable sealing end compound, 132kV overhead line draft route alignment, switching station, and draft Order Limits including all land required for mitigation and construction.

The statutory stage will be carried out in accordance with section 42 of the Planning Act 2008 pre-application consultation requirements, including preparation of a Statement of Community Consultation and relevant notices. While the stage one consultation was non-statutory it followed the same guidance and was carried out in the spirt of the Act.

[3] https://assets.publishing.service.gov.uk/media/6630afc53579e7a8f398a9b3/150326_Pre-Application_Guidance.pdf

Note, this document has since been withdrawn by the government and replaced by updated guidance. but was current at the time of the Stage One Consultation.

4 How we consulted

4.1 Developing approach to consultation

Prior to the consultation, Green GEN Cymru prepared the Routeing and Consultation document, a chapter of which outlined the intended approach to the stage one consultation. In developing this approach, Green GEN Cymru took account of the following:

- the status of the proposals and the opportunity for these to be influenced by consultees
- government guidance on pre-application consultation for NSIPs
- information about the area including demographics, socio-economic activity, broadband access, mobility and other relevant factors that might influence how people could participate on the consultation
- other relevant projects in the area, including previous proposals for grid lines, and other major projects

4.2 Purpose of the consultation

The overall objective of the non-statutory consultation was to present relevant and meaningful information about the Project in a clear and accessible manner, for stakeholders and the public to be able to consider it and provide an informed response. This helps ensure a robust consultation that contributes to, and supports, the NSIP process and the Gunning Principles.

In consulting at a formative stage of the project we offered stakeholders and the public an opportunity to respond to the proposals at an early stage. This approach intentionally gives opportunity for feedback to potentially influence the development moving forward.

To achieve this, the project set forward a process that responded to all four Gunning Principals, alongside broader NSIP process guidance.

This included:

- presenting the need case, as outlined in the Green GEN Cymru Phase One Grid Connection Strategy and further detailed in the Project Routeing and Consultation Document, for developing the overhead line, supported on steel pylons;
- presenting the preferred collector substation search area and preferred route option
- presenting the benefits, constraints and adverse impacts of the proposed new infrastructure;
- pro-actively engaging with the local and wider community and stakeholders to understand their views of the Project and options presented;
- consulting with relevant local authorities and prescribed consultees at an early stage to ensure technical advice and local knowledge is considered in the early development of the Project; and
- addressing any questions regarding the route and evolving design options
- broadly raising awareness of the proposals prior to the statutory stage two consultation

4.3 Timing of the consultation

The stage one non-statutory consultation took place between 6 September and 18 October 2023.

4.4 Consultation materials

Project website

At the start of the non-statutory consultation, Green GEN Cymru launched a dedicated consultation website for the Project: https://greengenvyrnwyfrankton.com

The website contained all consultation materials released. It also contained dates and times of in-person consultation webinars and events and an online feedback form. The website also included an interactive map.

The website was always available during the consultation and provided stakeholders and the public with the information they needed to understand the proposals and provide meaningful feedback.

Consultation documents

The following documents were produced and shared digitally via the Project website, at community events and on request.

Project animation	Overview of the Project and its role in connecting new renewable energy to the national grid.
Consultation brochure*	Overview of the Project proposals, including a map of the route and detailed section maps with route description; description of the consultation process, how to find out more, and how to provide feedback.
Consultation feedback form*	A feedback form for anyone wishing to respond to the non-statutory consultation. The feedback form was made available in hard copy (returnable using the Freepost Green GEN Cymru TT address), and online via the Project website
Consultation FAQ*	A summary of some of the key questions and answers for the Project.
EMF fact sheet*	A factsheet, containing information about electric and magnetic fields (EMFs) and answers to questions commonly asked about EMFs in relation to grid infrastructure was produced and made available in hard copy and on the Project website. The factsheet also contained information setting out how consultees could find out more information about EMFs from the independent Energy Networks Association and provided contact details for the EMF helpline run by National Grid on behalf of the UK's electricity industry.

Green GEN Phase 2 Grid Connection Strategy	A report presenting grid connection options from Bute Energy's proposed Mid Wales Energy Parks to the National Electricity Transmission System.
Approach to Routeing Grid Infrastructure in England and Wales	A report presenting the process for the identification and appraisal of route options.
Vyrnwy Frankton Routeing and Consultation Report	A report outlining the identification of route options and our approach to consultation, together with its appendices

*available in printed format to take away from consultation events

The documents have remained available following the close of consultation.

4.5 Contact channels

At the start of the non-statutory consultation, Green Gen Cymru launched:

- a Freephone Project hotline (0800 915 3590);
- a dedicated Freepost address (FREEPOST Green GEN Cymru V2F); and
- a Project email address (info@greengencymru.com)

4.6 Consultation events and webinars

Community webinars

Two community webinars were organised as an opportunity for community individuals to find out more about the proposals. The webinar comprised a presentation on the proposals followed by a Q&A session. Dates and attendees for the webinars are shown in the table below.

Webinar	**Number of attendees**
Webinar 1 – 15 September 2023	4
Webinar 2 – 18 September 2023	6

In person community events

Six consultation events were held between 21 and 29 September 2023 to provide communities living along the proposed connection route with the opportunity to learn about the Project, to view maps and documents, and to meet and ask questions of the Project team in person.

The six locations were chosen based on their proximity to the proposals and suitability of the venue to host a community event. The dates and venues and number of attendees recorded at each of the events are listed below.

Event	Date	Time	Number of attendees
Hordley & Bagley Village Hall Lower Hordley, Ellesmere, Shropshire, SY12 9BQ	21.9.23	14.00 – 19.00	44
Llanymynech Village Hall Station Road, Llanymynech, Oswestry, Shropshire, SY22 6EE	22.9.23	14.00 – 19.00	184
Llanfair Caereinion Public Hall and Institute Bridge Street, Llanfair Caereinion, Welshpool, SY21 0RY	23.9.23	11.00 – 16.00	95
Llansantffraid Community Centre Treflan, Llansantffraid-Ym-Mechain, SY22 6AE	27.9.23	14.00 – 19.00	111
West Felton Village Hall Holyhead Road, West Felton, Oswestry, Shropshire, SY11 4EH	28.9.23	10.30 – 17.00	102
Meifod Village Hall Community Centre, Meifod, SY22 6DF	29.9.23	15.00 – 19.00	142
Total			678

4.7 Feedback mechanisms

To ensure that consultees could engage with the Project proposals and consultation meaningfully, feedback to the non-statutory consultation could be provided via the following channels:

- By completing and submitting a hardcopy feedback form in person at consultation events
- Using an online feedback form on the project website - https://www.greengenvyrnwyfrankton.com/
- By completing a hardcopy feedback form, or writing a letter, and sending it to FREEPOST Green GEN Cymru V2F
- By sending an email to info@greengenvyrnwyfrankton.com

To gather informed feedback on the proposals, a consultation feedback form was produced which asked a series of questions about different aspects of the proposals. The feedback form was made accessible online and in hard copy format.

4.8 Promoting the consultation

A series of activities were undertaken to raise awareness of the non-statutory consultation, as set out below. The campaign was planned to raise awareness and to make a wider range of communities aware of the consultation and how to take part.

- Consultation postcard: To notify consultees of the start of consultation, a postcard summarising the proposals and how to take part in the consultation was sent to the 3,542 addresses from within the consultation zone (see section 5.4 for an explanation of the consultation zone).

- Consultation Poster: a poster showing consultation dates and contact details was prepared and issued to community and parish councils and local venues and shops with a request for it to be displayed.

- Press advertising: print and online advertising in the *County Times* and *Shropshire Star* as the highest circulating publications in the region

- News releases: issued to local media outlets at key milestones including consultation launch, and post consultation.

- Website subscriber notices: update emails sent to subscribers to the Project website including key project milestones

5 Who we consulted

5.1 Consultees as defined by the Planning Act 2008

The Act requires certain bodies and groups to be consulted such as specialist bodies and statutory undertakers; local authorities; people with an interest in the land affected; and communities close to the proposals, as follows:

s42 (1) (a): prescribed consultees

Prescribed bodies as listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

Amongst others, the prescribed bodies to be consulted include all community councils and parish councils in whose area the proposals are sited, and adjoining councils.

s42 (1) (b) and 43: local authorities as described in the Act

Local authorities, as defined under s43 of the Planning Act 2008, including those in whose area the proposals are sited, and adjoining local authorities.

s42 (1) (d) and 44: those with an interest in the land to which the proposed application relates (such as ownership, tenancy and/or other interests)

All persons identified as having an interest in the land to which the proposals relate, within one or more of the categories set out in section 44 of the Planning Act 2008

s47 those 'living in the vicinity of the land to which the proposed application relates'.

While our stage one consultation was non-statutory consultation, we undertook consultation in the spirit of these requirements, as far as reasonably practicable given the early stage of the project.

5.2 Consultation in keeping with section of the Planning Act 2008

s42 of the Planning Act. This included, for example:

- Community and parish councils
- Natural Resources Wales
- Natural England
- The Environment Agency
- Historic England
- Cadw
- Local emergency services
- Local statutory undertakers (such as utility providers)

s43 of the Planning Act. This included:

- Powys County Council
- Shropshire Council

5.3 Consultation in keeping with section 44 of the Planning Act

Prior to the consultation, the Project took steps to establish who had an interest in the land affected by the proposals, such as through the Land Registry.

At the start of the consultation, the Project wrote to people with an interest in land asking for confirmation of their land interest. Meetings between Green GEN Cymru and PILs were held where requested, and feedback sought.

The in-person consultation events (see above) also provided an opportunity to meet PILs and answer questions. The consultation feedback form also encouraged PILs to identify themselves, particularly if they had not been contacted by the Project to date.

Following the consultation, PIL engagement has been ongoing at the request of any landowners and their professional representatives.

5.4 Community consultation in keeping with s47 of the Planning Act

For a statutory consultation, the Act requires applicants to prepare a Statement of Community Consultation (SoCC) setting out how it intends to consult. As the autumn 2023 was non-statutory, a SoCC was not produced and the plans for consultation were instead included in the Project's Routeing and Consultation Document (see section 4.4). A SoCC will be prepared for the statutory consultation.

For the autumn 2023 consultation, Green GEN Cymru used both in-person and digital engagement methods to ensure stakeholders could view consultation materials and provide feedback through means that felt most appropriate to them.

<u>Consultation zone</u>
A consultation zone (a geographic area which defines the area of focus for the consultation) was defined to ensure that all residents, businesses, and community stakeholders that may be affected by the Project were included in the engagement and consultation being carried out.

The zone included all addresses 1km either side of the substation search area and preferred route based on the likely visual impact, and potential disturbance from construction. Where the 1km buffer bisected or crossed a road or street of homes, the boundary was extended to include the whole settlement. The total number of addresses within the consultation zone identified was 3,452.

5.5 Additional stakeholder consultation

<u>Non-statutory consultees</u>
The Project also consulted with organisations and individuals who may have an interest in the proposals because of their role or interest. These organisations were identified by the Project team. This included, for example:

- Known local interest and community groups (such as recreation and special interest groups)
- Relevant charities
- Local knowledge groups (such as heritage, wildlife and conservation groups)

Elected representatives

Elected representatives for the area were also contacted with the offer of a briefing with the project team either as groups or individuals. This included:

- Members of parliament for affected constituencies
- Members of the Senedd for affected constituencies and regional MSs
- Relevant cabinet members at Powys County Council and Shropshire Council
- Ward councillors at Powys County Council and Shropshire Council whose wards are affected by the proposals

Community and Parish Council webinar

A webinar was held during consultation as an opportunity for community and parish councils to gain insights into the Project and engage in a Q&A session ahead of the public events. The webinar was hosted on Zoom, an online webinar platform. Invitees were affected community and parish councils whose clerks were emailed with details. The webinar comprised a short presentation on the Project and question and answer section, with Green GEN Cymru's team. The webinar took place on Thursday 14 September 2023.

6 How we took account of feedback

6.1 Introduction

All feedback received as part of the consultation was read and analysed by members of the Project team. This section describes how feedback received during the non-statutory consultation was processed and analysed, while section seven sets out Green GEN Cymru's responses to issues raised in consultee feedback.

6.2 Online response forms

An online version of the response form was available on the Project website. Completed forms were saved directly to the Stakeholder Management System (SMS) – a secure database that manages every aspect of consultation and engagement.

6.3 Hardcopy response forms and letters

Hardcopy documents received through the Freepost address were collected, scanned and then securely stored. The content of response forms was then manually input into the project SMS database. The content of letters was transcribed, checked for accuracy, and then entered to the analysis database.

6.4 Email feedback

Emails which were categorised as consultation feedback were separated from other emails in the inbox (following the completion of any correspondence with the senders). All feedback emails were then individually input into the analysis database, including attachments where applicable.

6.5 Analysis

Analysis of responses was completed within the SMS. The Project team developed a coding framework for capturing all issues raised in responses, where individual issues were assigned codes or 'tags', which were categorised by geographical location or route section, or in themes, such as Environment, Socio-Economic and Consultation. For example:

THEME	SUB ISSUE
Green GEN Cymru / Bute Energy Group	Company reputation
	Company finances
	Company strategy
Project strategic case	Need case
	Alternatives (including alternative route, undergrounding etc)
	Use of pylons
	Route selection process
	Broad support
	Climate Change/Adaptation/Resilience
	Broad objection
	Project funding
Section 1 – Cefn Coch to Llangyniew	Location specific comment

	Objection to route section
	Support of route section
	Changes to route section
	Comment on collector substation and/or Cable Sealing End Compound
Section 2 – Llangyniew to Meifod	Location specific comment
	Objection to route section
	Support of route section
	Changes to route section
Section 3 – Meifod to Llansantffraid-ym-Mechain	Location specific comment
	Objection to route section
	Support of route section
	Changes to route section
Section 4 – Llansantffraid-ym-Mechain to Llanymynech	Location specific comment
	Objection to route section
	Support of route section
	Changes to route section
Section 5 – Llanymynech to Lower Frankton	Location specific comment
	Objection to route section
	Support of route section
	Changes to route section
Energy generation being connected	All comments related to the energy generation
Engineering & construction	Location specific comment
	Accidents and emergencies
	Associated infrastructure
	Materials, resources and waste
	Engineering resilience
	Construction impacts on local area (including construction traffic)
Environment	Location specific comment
	Landscape and visual
	Biodiversity
	Climate Resilience
	Historic Environment
	Impact on wildlife and habitats (including animal species and habitats)
	Carbon
	Land quality
	Noise and vibration (including EMF)
	Air quality
Socio-economic	Location specific comment
	Specific comment on the Community Benefit Fund, including requests for investment.

	Community impacts
	Community opportunities
	Job creation / supply chain
	Impact on agriculture (including loss of arable land)
	Health and wellbeing
	Leisure and recreation (including horse riding, cycling, camping and caravanning)
	Property and business impacts (including loss of business/operations)
	Tourism and local economy
	Education/skills
	Crime and safety, anti-social behaviour
Consultation	Consultation general (experience of)
	Event locations and formats
	Consultation materials
	Communication channels
	Stakeholder engagement

Similar comments would receive the same code, with new codes created whenever new distinct issues were raised in the feedback.

For response forms, each answer was read and tagged with a code for each issue raised, with as many codes applied to the answer as was required to capture all issues raised in the text. For emails and letters, tags were applied to the section of text to which they corresponded.

The text tagged with each code was then reviewed and formed the basis of each issue statement. The issue statements, along with the Green GEN Cymru's responses, are detailed in Section 7 below.

6.6 Feedback received

The following sections describe the feedback received during the consultation. As with all consultations, respondents were self-selecting, and are not statistically representative of the population that was consulted or that may be affected by the proposals.

As noted below, responses to closed questions only represent those who completed a feedback form and answered these questions – the answers are not necessarily representative of most respondents, who responded by email.

The consultation received 183 responses.

The below tables outline the topic raised in the feedback and a summary of the feedback provided within the context of the above framework, along with a response from the Project.

7 Non statutory consultation responses summary tables

Non-statutory consultation responses

Report framework wording	Number of times an issue is raised within consultee feedback responses
'A small number of respondents'	1-10 responses
'A few respondents'	10-50 responses
'A considerable number of respondents'	50– 250 responses
'A large number of respondents'	Over 250 responses.

Topic	Summary of matters raised	Green GEN Cymru's response
Green GEN Cymru / Bute Energy Group		
Company reputation	A small number of respondents suggested that Green Gen Cymru is focused on profit margins rather than exploring alternatives such as undergrounding the cables. Reference was made to the corporate ownership and Danish investment	Green GEN Cymru is a wholly owned subsidiary of Windward Energy. Green GEN Cymru is a company registered in England and Wales with a head office situated in Cardiff. Bute Energy is also part of the Windward Energy group of companies. Bute Energy is developing proposals for renewable energy parks in Wales. No Government funding or subsidies are available for the development of projects to support Welsh Government's ambitions of 100% of energy produced by renewable sources by 2035, and therefore Green GEN Cymru have sought investment from an experienced developer/operator of renewable projects, Copenhagen Infrastructure Partners. In July 2024, Green GEN Cymru was granted an Independent Distribution Network Operator (IDNO) licence by OFGEM so that it can build, operate and

Topic	Summary of matters raised	Green GEN Cymru's response
	associated with the proposals, with other respondents noting that the project prioritises profits over the environment. They claimed the proposal was biased, as Bute Energy would profit from the project.	maintain a 132kV network. IDNOs are companies that develop, own, operate and maintain smaller, local electricity distribution networks (up to 132kV), within the regional Distribution Network Operator (DNO) network. As a licence has been granted, Green GEN Cymru will have the benefit of the powers within the Electricity Act 1989. Green GEN Cymru will design, build, and operate a new 132kV distribution network needed to connect new Welsh renewable energy projects to the electricity transmission network, helping to get green energy to homes and businesses across Wales and beyond. As a Welsh-based company, and a IDNO Licence holder, Green GEN Cymru will be able to play a proactive role in the progression towards achieving Net Zero in Wales, supporting the efficient and timely connection of future renewable energy projects across Wales. Green GEN Cymru aims to move forward with the plans to deliver efficient and reliable grid infrastructure in Wales, opening broader opportunities for connections in the future. As Green GEN Cymru develop the Project, they are working with specialist advisors in relation to the environment and technical/engineering. They are also engaging with stakeholders to understand their views on the proposals and to seek advice on how the Project should be developed, and in particular the environmental assessment work. To support the application for a Development Consent Order Green GEN Cymru will also carry out an Environmental Impact Assessment (EIA). The aim of EIA is to protect the environment by ensuring that the decision maker, when

Topic	Summary of matters raised	Green GEN Cymru's response
		deciding whether to grant a consent for a project, which is likely to have effects on the environment, does so in the full knowledge of the likely effects, and takes this into account in the decision-making process. To support the application for a Development Consent Order, Green GEN Cymru will continue carry out comprehensive surveys and detailed independent analysis over an extended period. These assessments and studies are fundamental to inform the final design of the Project. All of this will be reported in the Environmental Statement (ES) which will support the application. Between 19 February and 16 April 2025 Green GEN Cymru will be undertaking a statutory consultation on the latest proposals. A Preliminary Environmental Information Report (PEIR) has been provided as part of the material for the statutory consultation and is available on the project website (As the draft alignment approaches Llansantffraid, pylons have been sited to reduce visual effects on properties, while managing potential effects on the river and farm operations. Using straight alignments in the approach to and past the village has reduced the number of potential pylons. As the draft alignment reaches Llansantffraid the draft alignment is routed to the south to the village and the A495, close to the commercial area, reducing visual impacts on residential properties. The draft alignment is routed close to the commercial area to the south of the A495.) for interested parties to review and comment upon. The feedback from this consultation will inform the proposals which will then form part of the application for a Development Consent Order which will be submitted to the Secretary of State for a decision.

Topic	Summary of matters raised	Green GEN Cymru's response
Company finance	A small number of respondents questioned why the Community Benefit Fund was being offered instead of the fund being reinvested into the cost of undergrounding the cables. Some respondents also expressed concerns about the allocation of the project's revenue and who the ultimate beneficiaries would be, suggesting that Green GEN Cymru might prioritise financial profit over minimising the impact on the community.	Green GEN Cymru's grid network can provide a regional network solution for the region and could open potential for business investment in the area, supporting the creation of jobs and skills, and the transition from fossil fuels to renewable energy for heating homes and electric vehicles. By hosting wind farm projects from Bute Energy, the communities closest to Green GEN Cymru's grid lines are also eligible to apply to Bute Energy's unique Community Benefit Fund. Worth millions of pounds per year, this money will be available to provide financial support for initiatives that improve the quality of life for community members, help secure clean energy independence, foster engagement, and address social and economic concerns – a unique approach in Britain. This fund is owned and administered by Bute Energy and decisions on how it is spent will be made by them. Please contact their Community Investment Team directly for more information. Green GEN Cymru is a private business but as an Independent Distribution Network Operator is regulated by Ofgem and bound by the Electricity Act 1989. The Electricity Act 1989 imposes a statutory duty on IDNO licence holders to develop a grid network which balances technical, economic, and environmental factors whilst having regard to the desirability of preserving the environment and doing what can reasonably be done to mitigate any affect the proposals may have on the natural environment.

Topic	Summary of matters raised	Green GEN Cymru's response
Company strategy	A small number of respondents raised concerns about the company's strategy on bringing forward connection proposals prior to the approval of the energy parks. They said the connection would not be needed if the windfarms did not go ahead. Other respondents expressed doubts about Green GEN Cymru's IDNO license, stating their view that the business's strategy to connect Bute Energy energy parks does not appear to reflect the intention to be an independent IDNO.	New electricity infrastructure is essential to connect new electricity generation to the transmission network and to meet the expected significant increase in electricity demand in the coming years. Connecting new renewable generation will also support the Government's objectives of decarbonising the network. In July 2024, Green GEN Cymru was granted an Independent Distribution Network Operator (IDNO) licence by OFGEM so that it can build, operate and maintain a 132kV network. IDNOs are companies that develop, own, operate and maintain smaller, local electricity distribution networks (up to 132kV), within the regional Distribution Network Operator (DNO) network. As a licence has been granted, Green GEN Cymru will have the benefit of the powers within the Electricity Act 1989. The Electricity Act 1989 imposes a statutory duty on IDNO licence holders to develop a grid network which balances technical, economic, and environmental factors whilst having regard to the desirability of preserving the environment and doing what can reasonably be done to mitigate any affect the proposals may have on the natural environment. Green GEN Cymru is uniquely placed to accelerate progress on network infrastructure to allow Wales to have a grid that can cope with additional usage and help the Welsh Government meet its climate change objectives, whilst ensuring security of supply for consumers. Green GEN Cymru intends to design, build and operate the proposed 132kV distribution network needed to connect new energy projects to the electricity transmission network, helping to get green energy to homes and businesses

Topic	Summary of matters raised	Green GEN Cymru's response
		across Wales and beyond. Green GEN Cymru, subject to appropriate consents, will pay for the construction and maintenance of the new electricity distribution network, while renewable energy generators will pay an annual charge for using the distribution network, which provides Green GEN Cymru with a return on its assets. As a licence holder Green GEN Cymru is required to offer connections to third party developments in line with the licence conditions. Green GEN Cymru already has signed connection agreements in place with a number of energy generators, including Bute Energy.
Energy Policy		
Comment on Energy policy	A few respondents commented on general energy policy, noting Wales produces more renewable energy than it uses, therefore the focus should be on developing energy in other areas of the UK. Some respondents noted the location of energy production. Citing it should be	As Wales decarbonises, fossil fuel consumption in the heat and transport sectors will transition to electricity which may result in electricity consumption almost tripling by 2050. Electricity generation therefore needs to increase at pace to meet this need. Combining this with the ambition to reach net zero targets and decrease reliance on foreign fossil fuel sources, it is clear that Wales' renewable energy generation needs to accelerate to meet and maintain progress towards Welsh Government targets. Tackling the climate emergency, connecting new community and renewable energy projects, creating and expanding businesses and electrifying our heating and transport systems will all require additional grid capacity. These are challenge that the country faces, ones that need to be tackled urgently and ones that Green GEN Cymru are trying to help address. The project will reduce current grid capacity pressures by allowing direct connections for local energy users and energy generators.

Topic	Summary of matters raised	Green GEN Cymru's response
	proportionate to the population density of the area, suggesting energy should be produced closer to where demand is at its highest. Respondents noted wind energy may not sufficiently reinforce the energy network, suggesting alternative energy production such as nuclear energy would be better suited.	It has long been acknowledged by the Welsh Government, energy generators and network operators that a key challenge with respect to delivering Wales's net zero obligations, is the fact that the strongest renewable resources are generally in areas that have the lowest existing electricity network capacity, meaning that key strategic opportunities for renewable energy generation are currently sterilised. Without intervention, this lack of grid infrastructure across Wales is likely to have a detrimental impact on achieving the UK Government's and Welsh Government's net zero targets. Future Wales (Welsh Renewable Energy and Climate Change Policy Future Wales: The National Plan 2040 (February 2021)) notes "The Welsh Government acknowledges the significant challenge that grid infrastructure and capacity will have on the potential for new on-shore and off-shore renewable energy development across Wales" adding that the Welsh Government "are committed to working with energy networks and developers to identify opportunities and barriers as well as working collaboratively to find solutions". There is therefore a clearly identified national need for new renewable energy development and associated grid infrastructure in Wales. Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. The existing electricity network in Mid Wales does not have the capacity to connect new renewable energy to homes and businesses locally and nationally – to end the use of fossil fuels we need new infrastructure and quickly.

Topic	Summary of matters raised	Green GEN Cymru's response
		The ongoing energy crisis has highlighted the vulnerability of UK energy to external forces, with significant implications for energy affordability. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar.
Alternative energy generation (e.g. nuclear, offshore wind, hydro, solar)	A few respondents commented that the focus should be on alternative means of energy generation instead. Respondents noted the lack of support for onshore wind in the local communities. They expressed support for net zero energy, but that target should be met by alternative energy generation	The ongoing energy crisis has highlighted the vulnerability of UK energy to external forces, with significant implications for energy affordability. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar. The electricity grid will also change to connect these new sources to homes and businesses. If we do not upgrade the electricity network quickly, we risk missing renewable targets and failing to address the climate emergency. Green GEN Cymru's Vyrnwy Frankton connection will mean that the energy generated by new energy parks can be used in homes and businesses, both locally and nationally. The infrastructure we need to transition to a low carbon economy can also bring many benefits. It has the potential to create new skills and jobs, nationally and locally. It will also support the adoption of low carbon technologies in homes and businesses.

Topic	Summary of matters raised	Green GEN Cymru's response
	methods. Tidal energy, hydro-power, and solar power were all cited by respondents as more favourable methods of generating energy. Some respondents expressed concern that wind energy may be intermittent and less reliable compared to other methods like hydropower. Others suggested considering investment in researching new technologies and exploring alternative approaches to energy production.	There is vast potential for renewable energy in Wales, particularly from wind. The Welsh Government, the Senedd and energy generators have been looking for ways to unlock this potential for a number of years but have faced challenges due to a lack of electricity grid. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar. As an IDNO licence holder Green GEN Cymru must operate within the terms of its licence obligations. It is required to consider connection requests regardless of the means of that energy generation.
Alternative approach to	A few respondents questioned the necessity of building	Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. It is therefore limited in terms of where it is located.

Topic	Summary of matters raised	Green GEN Cymru's response
grid infrastructure (e.g. local networks, community networks)	a new line, suggesting that upgrading the existing infrastructure might be a more efficient solution than creating a new pylon route.	In addition, the existing electricity network infrastructure in Mid Wales does not have the capacity to connect new renewable energy generation to homes and businesses locally and nationally. Upgrading the existing network would not therefore be an efficient solution to connecting new renewable generation. The Project will provide the means of connecting new renewable energy generation to the wider network via a proposed 400kV substation in Shropshire, England (being developed by National Grid).
Project need case	A small number of respondents noted that without the wind farms, the need case for the proposals has not yet been established. Some respondents expressed concern about the interlocking nature of Green CEN Cymru's proposals and Bute Energy's proposals.	There is vast potential for renewable energy in Wales, particularly from wind. The Welsh Government, the Senedd and energy generators have been looking for ways to unlock this potential for a number of years but have faced challenges due to a lack of electricity grid. Further information on the need for the Project is set out in the Route Alignment Document which forms part of the materials for the statutory consultation. Green GEN Cymru is a wholly owned subsidiary of Windward Energy. Green GEN Cymru is a company registered in England and Wales with a head office situated in Cardiff. Bute Energy is also part of the Windward Energy group of companies. Bute Energy is developing proposals for renewable energy parks in Wales. In July 2024, Green GEN Cymru was granted an Independent Distribution Network Operator (IDNO) licence by OFGEM so that it can build, operate and maintain a 132kV network. IDNOs are companies that develop, own, operate and maintain smaller, local electricity distribution networks (up to 132kV), within

Topic	Summary of matters raised	Green GEN Cymru's response
		the regional Distribution Network Operator (DNO) network. As a licence holder, Green GEN Cymru is required to offer connections to third party developments in line with the licence conditions. As an IDNO, Green GEN Cymru will help deliver clean green energy to homes and businesses through developing energy networks. This will help tackle both the energy crisis and the climate crisis. It also looks to the future, providing the potential for electric vehicles, heating and fibre communications. Wales needs a grid network able to accommodate large increases in demand without compromising reliability and stability. New electricity infrastructure is essential to bring new energy generation online and to meet the expected significant increase in electricity demand in the coming years. Green GEN Cymru is uniquely placed to accelerate progress on network infrastructure to allow Wales to have a grid that can cope with additional usage and help the Welsh Government meet climate change objectives, whilst ensuring security of supply for consumers.
Alternative infrastructure		
Undergrounding	A considerable number of respondents suggested the route should be underground rather than overhead. They raised concerns about the potential	The National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024) which provides specific technical guidance for electricity networks infrastructure in England and Wales sets out that '*the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts*' (para 2.9.7),

Topic	Summary of matters raised	Green GEN Cymru's response
	visual impacts of overhead lines. Respondents commented that the local area provides visual amenities for relaxation, recreation, and tourism, which could be negatively affected by the proposals. Concerns were also raised regarding the longevity of overhead lines compared with underground lines. Respondents felt Green GEN Cymru may not have fully considered the costs associated with undergrounding the cables and requested greater transparency regarding the	Green GEN Cymru has considered a wholly underground solution and deemed this unsuitable as the additional cost would severely impact the viability of the proposals, the project would take more years to build, ecological impacts during construction would be increased and the solution would not comply with obligations under the Electricity Act. The Electricity Act 1989 imposes a statutory duty on IDNO licence holders to develop a grid network which balances technical, economic, and environmental factors whilst having regard to the desirability of preserving the environment and doing what can reasonably be done to mitigate any affect the proposals may have on the natural environment. If, in certain circumstances, it is determined that a section of underground cable (UGC) is required instead of overhead line, the approach would be to define the length of UGC necessary to overcome the constraint to overhead line routeing, consistent with a balance between technical and economic viability, deliverability and environmental considerations. Accordingly, the starting point of development is that alternating current (AC) overhead line technology is proposed. High voltage, high-capacity overhead lines are the proven economic, efficient, and reliable choice for the bulk movement of electricity throughout the world. Green GEN Cymru will consider undergrounding a 132kV overhead line, or section of that line, in particular circumstances where no suitable route for an overhead line can be identified because of environmental, technical or engineering constraints. Traditional underground cable trenching methods are typically between 6 and 10 times more expensive than overhead lines, but Green GEN Cymru notes that the development of new cable ploughing techniques may change this and are working to determine the cost and

Topic	Summary of matters raised	Green GEN Cymru's response
	decision-making process. Respondents commented that although undergrounding the lines may be more disruptive in the short-term, it may be more beneficial to the communities and the environment in the long-term.	feasibility of this method. These additional costs are made up of additional construction and material costs required for underground cables. Although underground cables typically remove the potential for long term landscape and visual effects resulting from the introduction of pylons into the landscape and into views, they can result in localised changes to landscape character due to vegetation clearance / removal. Underground cables for this type of project would typically require a swathe of cleared land for safety, operational and maintenance reasons. This area along the length of the cable route would typically remain clear, with the exception of hedgerows and low-lying vegetation, for the lifespan of the project. In addition, the construction impacts can be more significant on biodiversity and habitats. As well as additional cost implications, UGC can result in power transmission loss compared to OHL which will cause a reduction in system efficiency. Where distribution lines are put underground, it also hinders the opportunities for connections for both new energy generators and users in the future as connections into an underground line require more intrusive and costly technologies with circuit outages being far more time lengthy than the equivalent OHL connection. When routeing the Project, Green GEN Cymru ensured the development adheres to the IDNO licence obligation to be 'economic and efficient'. Green GEN Cymru is able to achieve this by proposing a primarily overhead line (OHL) route as the construction cost is significantly lower than alternative options, such as installing new underground cables (UGC). The Project is currently being proposed as an overhead line with approximately 4.8km of underground

Topic	Summary of matters raised	Green GEN Cymru's response
		cables. This section of underground cable has been included within the Project due to the constraints of routing through the proposed Llyn Lort Energy Park It is acknowledged that a number of responses to the consultation have suggested certain locations that could benefit from undergrounding the connection due to specific constraints in the area. This feedback has been considered, but it is considered that impacts can be mitigated by careful micro siting of the overhead line.
T-pylons/wood pylons	A small number of respondents noted that alternative pylons such as T-pylons may cause less of a visual impact compared to standard lattice pylons.	The pylon types and heights have been carefully selected, attempting to achieve the most optimal solution, striking a balance between pylon utilisation, cost, visual impact, land take and environmental impact, whilst achieving and maintaining minimum safety clearances. T-pylons are designed for 400kV overhead lines and are not appropriate or suited for 132kV overhead lines. Field experience has shown that galvanized steel fades over time and blends into the background or skyline better than painted steel. This fading is ongoing, but the majority of the effect takes place over the first 1-2 years that it is subjected to weather and atmospheric conditions. Although wood poles offer a more natural aesthetic, they do not provide the structural capacity to support the conductor configuration to transport the required amount of electricity for the entirety of the route.

Topic	Summary of matters raised	Green GEN Cymru's response
		To support a conductor system capable of providing the required capacity rating, approximately four parallel wood pole lines would be required, resulting in increased land take which may have more visual impact.
Cable ploughing	One respondent noted that cable trenching should be considered as an alternative due to the reduced costs associated with standard undergrounding methods.	Green GEN Cymru is giving significant consideration to modern undergrounding techniques, meeting and engaging with contractors to discuss their viability for their projects. Green GEN Cymru is not opposed to cable ploughing, nor any other technology that will add value to the scheme. In developing our proposals, Green GEN Cymru have to balance technical feasibility and cost. The increase in cost of installing underground cables when compared to an overhead line is predominantly due to the cost of manufacturing and supplying the cable itself, not due to the installation method. Therefore, whilst modern undergrounding methods, such as cable ploughing, may be marginally cheaper than the traditional open trenching method, the overall cost for installing the underground cable is still much more expensive than an overhead line. The ploughing method could enhance programme efficiency but could introduce risks of weather-related downtime and unknown site-specific constraints (e.g. ground conditions), particularly in rocky or wet areas. At this stage, Green GEN Cymru would assume the undergrounding of a 132kV overhead line within a designated landscape such as a National Park or National Landscape (as set out in the National Policy Statement EN-1 and EN-5) and this has been taken into account in the consideration of the connection

Topic	Summary of matters raised	Green GEN Cymru's response
		option that is presented at the statutory consultation. Consideration of undergrounding in other areas will be determined on a project specific basis and will be considered in subsequent stages of project development. Consideration is still being given to the NRW proposals for a new Northeast Wales National Park in the vicinity of the Project.
Use of pylons		
Concerns regarding the use of pylons	A few respondents expressed concerns about the use of pylons, as they may have a significant visual impact on the surrounding countryside, as they are not in keeping with the landscape, environment and community. They emphasised the importance of preserving the undisturbed landscape, noting that this is one of the few areas in Mid	The pylon types and heights have been carefully selected, attempting to achieve the most optimal solution, striking a balance between pylon utilisation, cost, visual impact, land take and environmental impact, whilst achieving and maintaining minimum safety clearances. Field experience has shown that galvanized steel fades over time and blends into the background or skyline better than painted steel. This fading is ongoing, but the majority of the effect takes place over the first 1-2 years that it is subjected to weather and atmospheric conditions.

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	Wales that still enjoys such natural beauty.	
Concerns regarding the height of pylons	A small number of respondents raised concerns over whether the 27 metre tall pylons will be able to cope with the predicted capacity and questioned whether taller pylons might be required in the future.	The pylon types and heights have been carefully selected, attempting to achieve the most optimal solution, striking a balance between pylon utilisation, cost, visual impact, land take and environmental impact, whilst achieving and maintaining minimum safety clearances. Much of the traditional grid infrastructure in the country has been used for decades. Innovative technological advancements in the field mean that the capacity able to be carried on L7(c) pylons has increased significantly over the last few years and as such we are confident that the L7(c) is suitable to carry the capacity needed. Green GEN Cymru will be seeking a Development Consent Order for the Project. This will grant consent within certain parameters including pylon heights. It will not be possible to replace the pylons with significantly taller pylons in the future under this consent.
Broad comment on routeing process	A few respondents gave broad comments on the routeing process, noting the proximity of the route to residential properties. Respondents	As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced though the siting of pylons. We also consider other environmental and technical considerations including, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses.

Topic	Summary of matters raised	Green GEN Cymru's response
	expressed concern regarding the impacts this may have on their property and health. Other respondents felt Green GEN Cymru had not carried out adequate environmental surveys for the proposals. Some respondents also commented on the width of the route corridor and the similarities to the previous Mid Wales Connection proposed by National Grid. Respondents questioned why Green GEN Cymru altered the route from	As part of the approach to routeing, Green GEN Cymru is committed to, and has been following, the guidance set out in the Holford Rules and associated notes of clarification for routeing overhead lines, the key principles of which include avoiding prominent ridges and skylines; following broad wooded valleys; avoiding settlements and residential properties; and maximising opportunities to make use of a background of landform or other features such as woodlands which can be viewed behind the proposed new infrastructure (known as 'back clothing'). Where such features cannot be avoided or are within close proximity, routeing seeks to find the best option. For example, routeing equidistant between residential properties and areas of settlement, or utilising screening provided by intervening vegetation or landform that may bring the route closer to a feature, but it remains screened. Green GEN Cymru recognises that new infrastructure can be disruptive to communities and stakeholders. We are committed to doing everything we can to cause the least disturbance to the environment and those who live, work and enjoy recreation close to our proposals. As part of our application for a Development Consent Orde r Green GEN Cymru will complete an assessment that will consider potential health and well being impacts arising from the Project. A preliminary assessment has been included in the PEIR that has been provided as part of our statutory consultation materials. With regards to property values, it is very important to us that people respond to the statutory consultation and tell us their concerns so we can work to reduce effects on communities and individual properties. Once we have a final design, Green GEN Cymru will speak with landowners affected on a one-to-one basis

Topic	Summary of matters raised	Green GEN Cymru's response
	National Grid's proposals.	and to discuss how we can support them. Green GEN Cymru will work hard to reduce impacts on individual properties but if the final design does impact properties, Green GEN Cymru will discuss what compensation is available in line with current legislation The ongoing design of the Project will be informed by further desk and field surveys to identify the environmental baseline. The results of the surveys undertaken to date are presented in the PEIR that forms part of the statutory consultation materials. These surveys are continuing, and the results will inform the ongoing design and will be presented in the ES that will accompany our application for a Development Consent Order. While the National Grid proposals of 2013 share some similarities with the Vyrnwy Frankton connection, the two routes were proposed by different companies with different environmental teams. Any similarities in the route are a result of the approach to routeing, guided by the Holford Rules and informed by the environmental characteristics within the local area and not a desire to keep them the same. The Vyrnwy Frankton connection is a 132kV overhead line, rather than a 400kV that was proposed by National Grid. As Green GEN Cymru are proposing pylons with an average height of 28.5m rather than 50m pylons the routeing process will identify a draft alignment that is appropriate to the scale of those pylons. In developing the draft alignment the pylons have been micro-sited, maximising span lengths where possible to minimise effects on visual receptors and landscape features, whilst also taking account of other environmental conditions. The draft alignment is presented on the Consultation Plans provided

Topic	Summary of matters raised	Green GEN Cymru's response
		as part of the materials for the statutory consultation. Effects upon all receptors and assets will continue be assessed throughout the ongoing design process, including via fieldwork assessments, with the design being revised iteratively in response to potential effects as appropriate. The final design will form part of the application for a Development Consent Order. The application will be supported by an ES which will set out the outcome of the environmental assessments
Comments on National Grid's previous proposals	A few respondents referred to the previous Mid Wales Connection proposed by National Grid. Respondents sought clarification on why Green GEN Cymru is proposing a similar route. Some respondents noted the National Grid proposals as it was routed further away from properties and farms. Respondents also questioned why	While the National Grid proposals of 2013 share some similarities with the Vyrnwy Frankton connection, the two routes were proposed by different companies with different environmental teams. Any similarities in the route are a result of the approach to routeing, guided by the Holford Rules and informed by the environmental characteristics within the local area and not a desire to keep them the same. The Vyrnwy Frankton connection is a 132kV overhead line, rather than a 400kV that was proposed by National Grid. As Green GEN Cymru are proposing pylons with an average height of 28.5m rather than 50m pylons the routeing process will identify a draft alignment that is appropriate to the scale of those pylons. In developing the draft alignment the pylons have been micro-sited, maximising span lengths where possible to minimise effects on visual receptors and landscape features, whilst also taking account of other environmental conditions. The draft alignment is presented on Figure 3.1 of the PEIR provided as part of the materials for the statutory consultation. Effects upon all receptors and assets will continue be assessed throughout the ongoing design process, including via fieldwork assessments, with the design being revised iteratively in response to potential effects as appropriate. The final design will form part of

Topic	Summary of matters raised	Green GEN Cymru's response
	Green GEN Cymru are not undergrounding sections of the route through the Meifod Valley.	the application for a Development Consent Order. The application will be supported by an ES which will set out the outcome of the environmental assessments As Green GEN Cymru are proposing to use steel lattice pylons with an average height of 28.5m these are significantly smaller and less bulky than the pylons proposed previously in the area by National Grid and any visual effects will be significantly less as a result. The impacts of the smaller pylons rather than 50m pylons previously proposed are therefore different and it is considered that routeing requirements are different and undergrounding in sections of the route through the Meifod Valley is not necessary.
General routeing concern	A small number of respondents suggested that the overhead route should avoid passing through residential or environmentally sensitive areas.	As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid important nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced through the siting of pylons. We also consider other environmental and technical considerations including landscape designations, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses. Green GEN Cymru is committed to, and has been following, the guidance set out in the Holford Rules and associated notes of clarification for routeing overhead lines, the key principles of which include avoiding prominent ridges and skylines; following broad wooded valleys; avoiding settlements and residential properties; and maximising opportunities to make use of a background of landform or other features such as woodlands which can be

Topic	Summary of matters raised	Green GEN Cymru's response
		viewed behind the proposed new infrastructure (known as 'back clothing'). Where such features cannot be avoided or are within close proximity, routeing seeks to find the best option. For example, routeing equidistant between residential properties and areas of settlement, or utilising screening provided by intervening vegetation or landform that may bring the route closer to a feature, but it remains screened. Green GEN Cymru acknowledges that a number of responses to the consultation identified locations where respondents felt that an overhead line would be unacceptable to them and where specific constraints in the area meant that the connection should be put underground. This feedback has been taken into consideration in developing the proposals that form part of the statutory consultation. Further detail is provided in the Route Alignment Document that forms part of the materials for the statutory consultation. We will continue to review and consider the visual impacts and environmental impacts of the overhead lines and how these can be reduced through careful detailed routeing and siting.
General routeing suggestion	A small number of respondents suggested that the route must be managed to consider whether it goes through areas of outstanding natural	The Preferred Route does not go through any Areas of Outstanding Natural Beauty. Careful micro-siting of the pylons has minimised potential effects on PRoW and permissive paths during operation. Construction will be managed to minimise disruption to recreational activities. The assessment is set out in the PEIR provided as part of the materials for the statutory consultation.

Topic	Summary of matters raised	Green GEN Cymru's response
	beauty, permissive paths or canals.	The draft alignment crosses the Montgomery Canal and its towpath in two locations – Llanymynech (Section 4) and Maesbury Marsh (Section 5). Whilst there are likely to be landscape and visual effects as a result of the introduction of an overhead line in proximity to the Montgomery Canal at Llanymynech and Maesbury Marsh, the alignment at these locations has been developed considering environmental and technical reasons. This includes providing a perpendicular crossing that allow for a maximum span width across the canal, thus maximising the distance that pylons can be offset from the canal and reducing the visual impacts on recreational users of the canal. Construction will be managed to minimise disruption to recreational activities on the canal. The assessment of the effects on the canal is set out in the PEIR provided as part of the materials for the statutory consultation At Llanymynech, the draft alignment crosses an area of the Montgomery Canal which is designated as a SAC and a SSSI. The primary reason for the Montgomery Canal's designation as an SAC is the presence of floating water-plantain Luronium natans, and no other qualifying features are listed in the citation. This species of aquatic plant can be avoided through spanning and therefore no impacts to the qualifying features of the SAC will occur. The citations for the Montgomery Canal's status as a SSSI (Wales and England) describe a range of submerged and floating aquatic plant species as the reasons for the designation and these can be avoided through spanning. Brief reference is also made in the SSSI citations to the site being "of importance in demonstrating aspects of the succession from open water to reedswamp and fen" and to areas of scrub, rough grassland and willow carr adjacent to the canal, which could also be avoided through spanning.

Topic	Summary of matters raised	Green GEN Cymru's response
		Kingfisher, grass snake and otter are also mentioned and impacts to these species can be avoided through spanning and implementing standard mitigation measures at the detailed design stage. Whilst there will be landscape and visual effects as a result of the introduction of an overhead line in proximity to the Montgomery Canal at Carreghofa Locks, the draft alignment has been developed to maximise the potential for screening from existing vegetation and landform, and to avoid the pylons skylining. Screening by the existing vegetation and from the natural variations in landform will assist in reducing the magnitude of the likely landscape and visual effects. These considerations are in line with the Holford Rules. Close to Maesbury Marsh there are no residential properties within the Preferred Route which was presented at the non-statutory consultation. The alignment that has been developed avoids the area of settlement at Maesbury Marsh, including the listed buildings next to the canal. It also avoids the local wildlife site to the south of Maesbury Marsh. The crossing point maximises the potential for screening from existing canal-side vegetation, which will assist in reducing the magnitude of the likely landscape and visual effects. These considerations are in line with the Holford Rules.
More detail needed	A small number of respondents felt that Green GEN Cymru had not provided adequate detail on pylon locations and	The non-statutory consultation held between September and October 2023 was to seek feedback on the preferred 200m corridor for an overhead line through Powys and Shropshire, at this stage pylon locations were not proposed. Feedback to the consultation together with the findings of Green GEN Cymru's own assessments has informed the ongoing development of our proposals

Topic	Summary of matters raised	Green GEN Cymru's response
	potential environmental impacts.	including the pylon locations. For the statutory consultation we are presenting our proposals for the overhead line infrastructure (including pylon locations), underground cable section, collector substation at Grug y Mynydd, cable sealing end compound, switching station at Lower Frankton and areas required for construction. More detail is provided in the statutory consultation materials including the Consultation Plans, Indicative Site Layouts, Typical Layouts – Construction, Typical Tower and Foundation Designs. Our initial assessment of potential impacts is set out in the PEIR.
Location specific comment	One respondent noted that the A438 corridor would be a preferable route as it already has existing powerlines and would cause less visual impact.	The alternative route proposed along the A483 corridor has been considered. Appendix B of the Routeing Consultation Document shows that the A483 route was appraised (Option 3) but was not the most suitable option.
Broad support		
Broad support	A small number of respondents expressed support for the project, noting that the route seems reasonable and that the proposals are	General support for the development of the projects is noted. Specific comments in relation to the potential impact that the Project may have on both communities and the environment are taken very seriously and have been addressed through our statutory consultation documents which can be found on the Project website https://greengenvyrnwyfrankton.com/en/

Topic	Summary of matters raised	Green GEN Cymru's response
	necessary and long-awaited.	The Project will support the Welsh Government's target for 100% renewable electricity in Wales by 2035. The Green GEN Cymru Vyrnwy Frankton Connection will help develop a stronger, more resilient renewable electricity network that is greatly needed in Wales – taking clean, green energy from where it is generated to the many homes and businesses that will use it. Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. The existing electricity network in Mid Wales does not have the capacity to connect new renewables energy to homes and businesses locally and nationally – to end the use of fossil fuels we need new infrastructure and quickly. The ongoing energy crisis has highlighted the vulnerability of UK energy to external forces, with significant implications for energy affordability. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar.
Broad objection		
Concern and broad objection to whole project	A considerable number of respondents demonstrated	General objection to the Project is noted. Specific comments have been addressed throughout the rest of this document.

Topic	Summary of matters raised	Green GEN Cymru's response
	concern and broad objection to the project as a whole. They demonstrated a strong objection to pylons and argued that the route must be reassessed in order to protect the countryside. Some respondents cited that the area has a history of protesting against pylons and argued that they want no electricity route at all through their local area. Respondents expressed the view that this may not be a viable solution for the energy crisis and suggested that it	As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced though the siting of pylons. We also consider other environmental and technical considerations including, landscape designations, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses. Green GEN Cymru is committed to, and has been following, the guidance set out in the Holford Rules and associated notes of clarification for routeing overhead lines, the key principles of which include avoiding prominent ridges and skylines; following broad wooded valleys; avoiding settlements and residential properties; and maximising opportunities to make use of a background of landform or other features such as woodlands which can be viewed behind the proposed new infrastructure (known as 'back clothing'). Where such features cannot be avoided or are within close proximity, routeing seeks to find the best option. For example, routeing equidistant between residential properties and areas of settlement, or utilising screening provided by intervening vegetation or landform that may bring the route closer to a feature, but it remains screened. Green GEN Cymru acknowledges that a number of responses to the consultation identified locations where respondents felt that an overhead line would be unacceptable to them and where specific constraints in the area meant that the connection should be put underground. This feedback has been taken into consideration in developing the proposals which are the subject of

Topic	Summary of matters raised	Green GEN Cymru's response
	should not be considered.	the statutory consultation. We will continue to review and consider the visual impacts and environmental impacts of the Project and how these can be further reduced. Whilst acknowledging the history of proposed overhead line routes in this area, and the previous objection to these schemes, although the earlier National Grid proposals and this Project share some similarities, the proposals were developed by different environmental teams. Any similarities in the route are a result of the approach to routeing, guided by the Holford Rules and informed by the environmental characteristics within the local area and not a desire to keep them the same. The Vyrnwy Frankton connection is a 132kV overhead line, rather than a 400kV that was proposed by National Grid. In addition, Green GEN Cymru are proposing approximately 27m high pylons rather than the 50m pylons proposed by National Grid. As Green GEN Cymru are proposing to use steel lattice pylons with an average height of 28.5m these are significantly smaller and less bulky than previous proposals by National Grid, and any visual effects will be significantly less as a result. The potential impacts of the smaller pylons are therefore different. Specific comments in relation to the potential impact that the Project may have on both communities and the environment are taken very seriously. Further information is presented in this document and other materials presented for the statutory consultation, including the Roue Alignment Document and the PEIR. The Project will support the Welsh Government's target for 100% renewable electricity in Wales by 2035. The Green GEN Cymru Vyrnwy Frankton

Topic	Summary of matters raised	Green GEN Cymru's response
		Connection will help develop a stronger, more resilient renewable electricity network that is greatly needed in Wales – taking clean, green energy from where it is generated to the many homes and businesses that will use it. Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. The existing electricity network in Mid Wales does not have the capacity to connect new renewables energy to homes and businesses locally and nationally – to end the use of fossil fuels we need new infrastructure and quickly. The ongoing energy crisis has highlighted the vulnerability of UK energy to external forces, with significant implications for energy affordability. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar.
Objections to future proposals	A small number of respondents questioned the future development of the project, suggesting that it could lead to an increase in wind	Green GEN Cymru intends to design, build and operate the 132kV distribution network that is needed to connect new Welsh renewable energy projects to the electricity transmission network, helping to get green energy to homes and businesses across Wales and beyond. In July 2024, Green GEN Cymru was granted an Independent Distribution Network Operator (IDNO) licence by OFGEM so that it can build, operate and

Topic	Summary of matters raised	Green GEN Cymru's response
	farms and pylons if not opposed.	maintain a 132kV network. As a licence holder Green GEN Cymru is required to offer connections to third party developments in line with the licence conditions. The Project will support the Welsh Government's target for 100% renewable electricity in Wales by 2035. Green GEN Vyrnwy Frankton will help develop a stronger, more resilient renewable electricity network that is greatly needed in Wales – taking clean, green energy from where it is generated to the many homes and businesses that will use it. Much of the existing electricity transmission infrastructure in Wales was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. The ongoing energy crisis has highlighted the vulnerability of UK energy to external forces, with significant implications for energy affordability. Onshore renewable energy in Wales will provide greater energy security, reducing reliance on imported fossil fuels. Onshore wind offers the most cost-effective choice for new electricity generation in the UK – cheaper than gas, nuclear, coal and other renewables. As we move away from fossil fuels, new energy generation will be located where it can capture sustainable sources like wind, tidal and solar.
Sections		
Section 1 - Cefn Coch to Llangyniew	A small number of respondents commented on Natural Resources Wales's plans to create a new national	National Resources Wales (NRW) has been consulting on a proposed new Northeast Wales National Park. The Project lies close to, and partly within, the southern edge of the search area published by NRW. The National Park boundary has therefore not yet been confirmed. Green GEN Cymru is continuing to engage in the consultation on the proposals and will continue to review its proposals with regard to the still developing proposals by NRW.

Topic	Summary of matters raised	Green GEN Cymru's response
	park near Dolanog, which Green GEN Cymru's proposals would cross. Respondents also provided comments about ancient woodlands along the Banwy River and Mathrafal forest. They felt the view of Mathrafal could be negatively impacted by the use of pylons. Other respondents expressed concerns that the route corridor runs close too residential properties in section one, with potential impacts on property value being a primary concern.	Areas of woodland has been avoided where possible. The draft alignment crosses the Afon Banwy where the ancient woodland strips along the riverbanks are narrow, and where the crossing can be made perpendicular to the river, minimising the amount of woodland that could potentially require work, however some trees may have to be cleared. With regards to impacts on Mathrafal, details are provided under the Section 2 Llangyniew to Meifod response below. Distance of the route from more sensitive assets and designations and residential properties is considered at each stage of the routeing process, including via fieldwork and assessments, with the design being revised iteratively in response to potential effects as appropriate. Micro siting of pylons has considered likely visual effects on nearby residential properties. Effects upon visual amenity have also been considered across the full route length during the development of the draft alignment for the statutory consultation. More detail is provided in the PEIR. As work progresses and in response to feedback to the statutory consultation the design will be subject to further review and assessment prior to an application for development consent being submitted. This will be accompanied by an ES which will include an assessment if visual effects. With regards to property values, it is very important to us that people respond to the statutory consultation and tell us their concerns so we can work to reduce effects on communities and individual properties. Once we have a final design,

Topic	Summary of matters raised	Green GEN Cymru's response
		Green GEN Cymru will speak with landowners affected on a one-to-one basis and to discuss how we can support them. Green GEN Cymru will work hard to reduce impacts on individual properties but if the final design does impact properties, Green GEN Cymru will discuss what compensation is available in line with current legislation.
Section 2 – Llangyniew to Meifod	A few respondents raised concerns regarding the Meifod Valley - it has significant cultural and visual importance to the community. Respondents noted the potential negative impacts of the proposals on the valley. Respondents felt that Green GEN Cymru have not adequately considered the visual and local community impacts when routing through section two.	Meifod and its associated assets have been considered during the routeing phase of the project and the selection of the Preferred Route and during the development of the draft alignment. The Preferred Route (2N) (located at the southern end of the Meifod Valley) was preferred for a number of environmental reasons, which are set out below. • It is the shortest route and therefore likely to have fewer pylons which is likely to require less land. • It provides the shortest and straightest route near Mathrafal, minimising both the number of pylons required, and the need for angle pylons that can be visually more detracting. • It routes away from residential receptors and areas of settlement where possible, or equidistant between properties. • It is routed along the lower slopes of the valley rather than along the highest points close to the B4389, in order to reduce its visibility and minimise any skylining. • It seeks to avoid or minimise effects on visual receptors engaged in recreational activities, including those using caravan parks and recreational facilities such as the rugby club and long-distance trails (Cross Britain Way / Glyndwr's Way) at Meifod. • It offers opportunities to avoid potential harm to the setting of Mathrafal Castle (Scheduled Monument) and the associated non-designated park

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	Respondents asked why the lines could not be undergrounded as the National Grid Mid Wales project had previously proposed undergrounding in this area. Respondents also mentioned the lesser horseshoe bat population around Mathrafal and expressed concerns about their protection during the construction and operation of the project. Flooding in section two was mentioned as respondents commented that Green GEN Cymru	at Mathrafal. If the route was shifted to the to the southern side of the valley, there would be more screening from trees and back-clothing provided by rising valley sides, however, there would also be increased tree losses and river crossings, and the route would be more complex with potentially more visually distracting angle pylons. These considerations are in line with the Holford Rules. • Micrositing of pylons at the detailed design stage will minimise effects due to setting change to historic assets. Distance of the route from properties has been considered during the routeing phase of the project and the visual and amenity impacts from properties will be further mitigated by careful siting of the overhead line. In response to feedback the draft alignment has moved outside the preferred route in this section with the draft alignment at a greater distance from Mathrafal. Further information is provided in the Route Alignment Document and the PEIR, which presents the initial assessment of the potential effects, and which form part of the materials for the statutory consultation. Micro-siting of the pylons has considered span lengths, visibility from the rear of the residential properties near the B4389 and visibility from the lower valley where the caravan sites are located. Tower siting has also considered flooding, recreational activities (including at the rugby club, the long-distance footpaths at Meifod and the site where the National Eisteddfodd is held), heritage assets, and minimising any required works to trees and woodland. The Green Gen Cymru Vyrnwy Frankton connection is a 132kV overhead line connection rather than the 400kV overhead line proposed by National Grid. As

Topic	Summary of matters raised	Green GEN Cymru's response
	had not taken the flood plains into consideration when selecting the route.	Green GEN Cymru are proposing to use steel lattice pylons with an average height of 28.5m these are significantly smaller and less bulky than the pylons previously proposed and any visual effects are significantly less as a result. The effects of the smaller pylons are therefore different and undergrounding in the vicinity of Meifod is not currently proposed. The Preferred Route avoided the Coed Tŷ-Mawr SSSI and the Glascoed, Meifod SSSI, and most areas of woodland which would be suitable for lesser horseshoe bats and crosses a shorter length of Wood Pasture and Parkland Priority Habitat near Mathrafal. Impacts to linear features, such as hedgerows, which bats could use for commuting, can be avoided through micro-siting of pylons. A preliminary assessment of the effects on biodiversity is included in the PEIR which has been provided as part of the statutory consultation materials. Flood risk has been considered in developing the draft alignment and micro siting the pylons. A preliminary assessment has been undertaken to understand the potential impact of the Project on flood risk to or from the area and is presented in the PEIR. The ES will include a flood risk assessment. The Project design has considered the placing of ground-based infrastructure in mapped flood zones. Where this is unavoidable, for example where the span between pylons would be too great to enable them to operate safely, suitable mitigation will be employed such that necessary ground-based infrastructure (e.g. pylon bases) do not cause an increase in potential flood risk to up and/or downstream receptors. The Project is continuing to engage with relevant technical stakeholders on this topic.

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Section 3 – Meifod to Llansantffraid-ym-Mechain	A few respondents expressed concerns about section three. Respondents noted the narrowness of the valley and the ecology, they expressed concerned about the impacts on the pylons on the biodiversity. Respondents suggested the route could be changed to be routed North West of the village to avoid local impacts. Others expressed concern about the proximity of the route to heritage sites and grade-listed buildings. Others noted the proximity of the corridor to the caravan site near Llansantffraid and	The Preferred Route to the north of Meifod and west of Trefanney followed the southern side of the lower Meifod valley areas, utilising the screening and back-clothing afforded by existing trees along the Afon Vyrnwy, by areas of woodland and by the southern valley sides. Careful micro-siting has positioned pylons to minimise or avoid direct impacts on recreational activities, sites important for heritage assets, to minimise any required works to trees and woodland and to be less visible from properties where possible To the north of Meifod the draft alignment avoids the Safleoedd Ystlumod Tanat ac Efyrnwy SAC/SSSI, therefore reducing the risk of impacts to the lesser horseshoe maternity roost for which this SAC/SSSI is designated. Routeing also considered areas of ancient woodland in order to further reduce potential effects, for example by avoiding fragmentation of potential commuting routes. The effects on Meifod, including on the rugby club have been considered under Section 2 above. At Waen Fach the draft alignment has moved out of the preferred route, in response to feedback to avoid the chicken farm adjacent to the River Vyrnwy. More detail on this change is provided in the Route Alignment Document which forms part of the statutory consultation materials. As the draft alignment approaches Llansantffraid, pylons have been sited to reduce visual effects on properties, while managing potential effects on the river and farm operations. Using straight alignments in the approach to and past the village has reduced the number of potential pylons.

Topic	Summary of matters raised	Green GEN Cymru's response
	the Cobra Rugby Club near Meifod. Others commented on proximity to the chicken farm. Respondents suggested the landscape should be preserved by undergrounding the line. Respondents noted the possible expansion of the NRW's National Park and how the project would react if the park was expanded, as the proposed route would cross the park boundary.	It is not considered viable or appropriate to take forward localised underground in this section due to the environmental assessments to date, technical complexity and additional cost associated with the development of an underground cable. Although underground cables typically remove the potential for long term landscape and visual effects that result from the introduction of pylons into the landscape and into views, they can result in localised changes to landscape character due to vegetation clearance/removal. Underground cables for this type of project would typically require a swathe of cleared land for safety, operational and maintenance reasons. This area along the length of the cable route would typically remain clear, with the exception of hedgerows and low-lying vegetation, for the lifespan of the project. In addition, the construction impacts can be more significant on biodiversity and habitats. The Project lies close to, and partly within, the southern edge of the search area published by NRW for the new Northeast Wales National Park. The National Park boundary has therefore not yet been confirmed. Green GEN Cymru is continuing to engage in the consultation on the proposals and will continue to review its proposals with regard to the still developing proposals by NRW.
Section 4 - Llansantffraid-ym-Mechain to Llanymynech	A few respondents raised concerns about section four of the route. Respondents noted	The Preferred Route between Llansantffraid-ym-Mechain and Llanymynech (4C) was selected as it generally provides better opportunities to minimise effects on denser areas of residential properties and settlements. It crosses a less exposed section of the valley near to Carreghofa Locks where existing woodland will provide some screening to minimise visual effects and avoids

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	heritage assets, such as Vyrnwy Aqueduct and the St. Tysilio Church near Llandysilio, could be negatively impacted, particularly as the view from the A483 may be impacted by the proposals. Respondents provided comments regarding the Montgomery Canal. They expressed concern about the proximity of the proposals, as Powys County Council had successfully bid for funding to improve the waterway. Respondents also raised concerns regarding nesting	passing in close proximity to visitor attractions at Llanymynech Hill Camp or Llanymynech Heritage Area. With regards to the Vyrnwy Aqueduct in developing the design further this feature has been avoided as the draft alignment passes through the open fields to the north. Detailed routeing of the draft alignment has sought to minimise potential effects on the Church of St. Tysilio and associated sundial and schoolhouse (listed buildings). In response to feedback concerning potential impacts at Llandysilio the route has been moved to the north. Moving the preferred route to the north would reduce the potential harm to Church of St. Tysilio and associated Sundial and Schoolhouse (Listed Buildings). It would also take the route further from properties in Llandysilio. It would however be closer to properties, such as Ty Coch, at the crossing point of the A483, and closer to the buildings in the Llanymynech Conservation Area. However, there is sufficient separation to help preserve setting. From a technical perspective there was no preference for either retaining the preferred corridor or moving to the north. In balancing the environmental constraints and the technical considerations, the overall preference was to move the preferred route further north of the A483 away from Llandysilio. Further information on routeing is provided in the Route Alignment Document. The Preferred Route crosses an area of the Montgomery Canal which is designated as a SAC and a SSSI. The primary reason for the Montgomery Canal's designation as an SAC is the presence of floating water-plantain

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	birds in the area such as the peregrine falcons, and the potential impacts on their flight paths. Similarly to section three flooding and undergrounding were also an issue raised by respondents. Respondents have requested undergrounding to protect the visual amenities of the area.	Luronium natans, and no other qualifying features are listed in the citation. This species of aquatic plant can be avoided through spanning and therefore no impacts to the qualifying features of the SAC will occur. The citations for the Montgomery Canal's status as a SSSI (Wales and England) describe a range of submerged and floating aquatic plant species as the reasons for the designation and these can be avoided through spanning. Brief reference is also made in the SSSI citations to the site being "of importance in demonstrating aspects of the succession from open water to reedswamp and fen" and to areas of scrub, rough grassland and willow carr adjacent to the canal, which could also be avoided through spanning. Kingfisher, grass snake and otter are also mentioned and impacts to these species can be avoided through spanning and implementing standard mitigation measures. The Project will not impact proposals to improve the waterway for recreational purposes as the overhead line will have sufficient height clearance. As part of the routeing and design process, biodiversity interests have been and will continue to be taken into account. Field surveys are continuing and providing further baseline data on habitats and protected species, including birds. Breeding bird surveys and flight activity surveys are underway and the initial results are included in the PEIR. Survey information will inform the assessment and mitigation which will be presented in the ES that will accompany the application. This data will inform and help develop the ongoing design of the Project to reduce effects on biodiversity. All bird nesting sites would be safeguarded during construction.

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		Flood risk has been considered in developing the draft alignment and micro siting the pylons. A preliminary assessment has been undertaken to understand the potential impact of the Project on flood risk to or from the area and is presented in the PEIR. The ES will include a flood risk assessment. The Project design has considered the placing of ground-based infrastructure in mapped flood zones. Where this is unavoidable, for example where the span between pylons would be too great to enable them to operate safely, suitable mitigation will be employed such that necessary ground-based infrastructure (e.g. pylon bases) do not cause an increase in potential flood risk to up and/or downstream receptors. The Project is continuing to engage with relevant technical stakeholders on this topic. It is not considered viable or appropriate to take forward localised underground in this section due to the environmental assessments to date, technical complexity and additional cost associated with the development of an underground cable. Although underground cables typically remove the potential for long term landscape and visual effects that result from the introduction of pylons into the landscape and into views, they can result in localised changes to landscape character due to vegetation clearance/removal. Underground cables for this type of project would typically require a swathe of cleared land for safety, operational and maintenance reasons. This area along the length of the cable route would typically remain clear, with the exception of hedgerows and low-lying vegetation, for the lifespan of the project. In addition, the construction impacts can be more significant on biodiversity and habitats. I

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Section 5 - Llanymynech to Lower Frankton	A considerable number of respondents provided comments with regard to section five of the route including impacts on Crickheath. Respondents raised concerns about the proximity of the route corridor to dwellings in Crickheath, and the impact on the landscape in the area. Others noted barn owls and Iron Age historical sites near Crickheath and Pant. It was broadly suggested by respondents the route should be moved away from the villages.	Consultation feedback requested re-routeing to increase the distance between the preferred route and Crickheath. The draft alignment has moved away from the preferred route to be so that the pylons will be further from Pant and Crickheath. While this may create some visibility of the connection from the higher ground of Llanymynech, it will reduce potential visual effects on Pant and Crickheath and the Montgomery Canal. The PEIR which has been provided as part of the statutory consultation materials incudes the preliminary assessment on cultural heritage and biodiversity (including bird species. An initial assessment of traffic and transport effects is provided in the PEIR that forms part of the materials for the statutory consultation. This information will be used to inform the ongoing design development. The potential impacts of the construction phase on the environment, including local communities will be assessed as part of the EIA for the Project. The ongoing design of the Project will be informed by desk and field surveys to identify the environmental baseline (including traffic numbers and the type of existing road network) and the Project will be designed to reduce construction effects where possible. The subsequent assessment of construction effects on the environment, including any additional mitigation measures to further reduce effects will be presented within the Environmental Statement (ES) that will accompany the Development Consent Order (DCO) application. The application will also be accompanied by an Outline Construction Traffic Mitigation Plan (OCTMP) which will set out the mitigation and control measures for construction traffic. The OCTMP will be discussed and agreed with the

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	Traffic during construction was noted, and the roads around Llanymynech was cited as a particularly dangerous stretch of road. Respondents asked that this be considered when construction and maintenance are taking place. Respondents also highlighted how the proposals could impact the proposed Pant and Llanymynech bypass. Navigation, mooring and heritage sites along the Montgomery Canal were raised as	relevant highways authorities. Green GEN Cymru will liaise with local communities in advance of and during construction of the Project. During routine maintenance traffic numbers will be very low. With regards to the proposed Pant and Llanymynech bypass, detail of bypass proposals are not confirmed, and it is not in planning stages. The Vyrnwy Frankton project is unable to give this further consideration at this time. However, should proposals come forward prior to the application these will be considered. During the routeing process consideration was given to proximity to the Montgomery Canal, including the associated ecological designations and designated heritage assets. The Project will not affect navigation and moorings along the Montgomery Canal. While the National Grid proposals of 2013 share some similarities with the Vyrnwy Frankton connection, the two routes were proposed by different companies with different environmental teams. Any similarities in the route are a result of the approach to routeing, guided by the Holford Rules and informed by the environmental characteristics within the local area and not a desire to keep them the same. The Vyrnwy Frankton connection is a 132kV overhead line, rather than a 400kV that was proposed by National Grid. As Green GEN Cymru are proposing pylons with an average height of 28.5m rather than 50m pylons the routeing process will identify a draft alignment that is appropriate to the scale of those pylons.

Topic	Summary of matters raised	Green GEN Cymru's response
	issues by respondents. Respondents inquired about the differences between the route and the National Grid Mid Wales Connection, expressing a preference for the National Grid proposals, which avoided the canal and included partial undergrounding. They also questioned why the current route cannot be placed underground.	The Vyrnwy Frankton connection is a 132kV connection rather than the 400kV proposed by National Grid. As Green GEN Cymru are proposing to use steel lattice pylons with an average height of 28.5m these are significantly smaller and less bulky than the pylons previously proposed and any visual effects will be significantly less as a result. The effects of the smaller pylons are therefore different and therefore the routeing is not the same. It is not considered viable or appropriate to take forward localised underground in this section due to the environmental assessments to date, technical complexity and additional cost associated with the development of an underground cable.
Llyn Lort Energy Park	A few respondents inquired about the reasoning behind the placement and need for the Lyn Lort Energy Park, expressing curiosity	The Llyn Lort Energy Park is being developed by Bute Energy, it is separate project and will be going through its own planning application process. Further details can be found at Home | Llyn Lort Energy Park - Llyn Lort Energy Park

Topic	Summary of matters raised	Green GEN Cymru's response
	about whether residents of Wales would benefit from it. Some respondents suggested that wind farms might be better situated near motorways rather than on upland moors to minimise visual impact. Additionally, some raised questions about the capacity of the park and whether it could lead to further developments in the future.	
Engineering and construction		
Associated infrastructure	A few respondents noted the effects of the infrastructure associated with the project. Some raised concerns about the potential impact on	The application for a DCO will be accompanied by an Environmental Statement which will set out the potential significant effects of the Project. The ES will include an assessment of the effects on hydrology and hydrogeology, including private water supplies. At this stage a preliminary assessment is provided in the PEIR.

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	underground water sources, with some suggesting that the related infrastructure could contribute to an increase in flooding. Other respondents expressed the view that building this infrastructure may be unnecessary, advocating instead for a focus on upgrading the current network rather than altering the landscape by adding more pylons.	Flood risk has been considered in developing the draft alignment and micro siting the pylons. A preliminary assessment has been undertaken to understand the potential impact of the Project on flood risk to or from the area and is presented in the PEIR. The ES will include a flood risk assessment. The Project design has considered the placing of ground-based infrastructure in mapped flood zones. Where this is unavoidable, for example where the span between pylons would be too great to enable them to operate safely, suitable mitigation will be employed such that necessary ground-based infrastructure (e.g. pylon bases) do not cause an increase in potential flood risk to up and/or downstream receptors. The Project is continuing to engage with relevant technical stakeholders on this topic. Tackling the climate emergency, connecting new community and renewable energy projects, creating and expanding businesses and electrifying our heating and transport systems will all require additional grid capacity. These are challenge that the country faces, ones that need to be tackled urgently and ones that Green GEN Cymru are trying to help address. The Project will reduce current grid capacity pressures by allowing direct connections for local energy users and energy generators. Much of the existing electricity transmission infrastructure in Wales and North Shropshire was built many years ago to transport electricity from old-fossil-fuel power stations in the north and south. It is therefore limited in terms of where it is located. In addition, the existing electricity network infrastructure does not have the capacity to connect new renewable energy generation to homes and businesses locally and nationally. Upgrading the existing network would not therefore be an efficient solution to connecting new renewable generation.

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Materials, resources and waste	A small number of respondents requested Green GEN Cymru to provide more information regarding the sourcing of materials and if Green GEN Cymru will be using Welsh-sourced material and workforce.	The Project is in the early stage of development and procurement for construction will not take place for several years. At that time, Green GEN Cymru will talk to a variety of suppliers to understand the options open to us and decide based on availability, quality and price. If there is steel available from a Welsh manufacturer that is a viable option, this will be considered. In the construction of its projects Green GEN Cymru will prioritise local supply chains. Contracts will include partners signing up to a social value standard, investing jobs, time and resources in the area.
Engineering resilience	A small number of respondents raised concerns over the longevity of the proposals in flood zones.	Flood risk has been considered in developing the draft alignment and micro siting the pylons. A preliminary assessment has been undertaken to understand the potential impact of the Project on flood risk to or from the area and is presented in the PEIR. The ES will include a flood risk assessment. The Project design has considered the placing of ground-based infrastructure in mapped flood zones. Where this is unavoidable, for example where the span between pylons would be too great to enable them to operate safely, suitable mitigation will be employed such that necessary ground-based infrastructure (e.g. pylon bases) do not cause an increase in potential flood risk to up and/or downstream receptors. The Project is continuing to engage with relevant technical stakeholders on this topic.

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		Pylons exist in flood plains across the country and we will ensure that we use appropriate construction methods in these sensitive areas to ensure risks are mitigated.
Construction impacts on local area (including construction traffic)	A few respondents have raised concerns regarding traffic during construction. Respondents highlighted that the local roads are narrow and will struggle to cope with large lorries. Respondents were also worried about the noise and dust pollution caused by construction.	An initial assessment of traffic and transport effects is provided in the PEIR that forms part of the materials for the statutory consultation. This information will be used to inform the ongoing design development. The potential impacts of the construction phase on the environment, including local communities will be assessed as part of the EIA for the Project. The ongoing design of the Project will be informed by desk and field surveys to identify the environmental baseline (including traffic numbers and the type of existing road network) and the Project will be designed to reduce construction effects where possible. The subsequent assessment of construction effects on the environment, including any additional mitigation measures to further reduce effects will be presented within the Environmental Statement (ES) that will accompany the Development Consent Order (DCO) application. The application will also be accompanied by an Outline Construction Traffic Mitigation Plan (OCTMP) which will set out the mitigation and control measures for construction traffic. The OCTMP will be discussed and agreed with the relevant highway authorities. Green GEN Cymru will liaise with local communities in advance of and during construction of the Project. During routine maintenance traffic numbers will be very low.
Environment		
Landscape and visual	A considerable number of	Potential visual effects have been and will continue to be considered through the routeing and ongoing design processes for the Project including through the

Topic	Summary of matters raised	Green GEN Cymru's response
	respondents raised concerns regarding the potential visual impacts of the proposals on the Meifod valley and Shropshire. Respondents commented that the local area provides spaces for people to relax and admire the landscape. Others said the visual amenities provide opportunities for tourism that may be negatively impacted by the proposals. Some suggested routing the pylons away from the highest points of the valley and planting trees along the route	Meifod Valley and in Shropshire. This includes consideration of recreational receptors for whom the landscape and views contribute to their experience, for example, visual receptors engaged in recreational activities whilst visiting the area, including those using the local public rights of way (PRoW) network and promoted footpaths and trails, those using the National Cycle Route Network, those visiting promoted viewpoints, or staying in visitor accommodation such as caravan parks. The preliminary assessments for landscape and visual and socio-economic (including tourism) are provided in the PEIR which forms part of the materials for statutory consultation. Visual and amenity impacts have been considered in developing the draft alignment and will continue to be consider in response to feedback and the ongoing assessments as the design progresses. Opportunities for mitigation will be identified. These could include tree planting along the route, beyond safety clearances. The Environmental Statement that will accompany the application for a DCO will include assessments of the effects on landscape and visual and tourism and other socio-economic receptors.

Topic	Summary of matters raised	Green GEN Cymru's response
	to help reduce the visual impacts and encourage biodiversity.	
Biodiversity	A few respondents provided comments regarding the potential environmental damage of the construction of pylons. They noted pollution and large amounts of concrete as points of concern. A small number of respondents also stated their concern for bird life and damage to soil during the construction and operation of the project.	The potential impacts of the construction phase on the environment, including local communities will be assessed as part of the EIA for the Project. The ongoing design of the Project will be informed by desk and field surveys to identify the environmental baseline (including noise, air quality and traffic) and the Project will be designed to reduce construction effects where possible. The subsequent assessment of construction effects on the environment, including any additional mitigation measures to further reduce effects will be presented within the Environmental Statement (ES) that will accompany the Development Consent Order (DCO) application. The application will also be accompanied by a Construction Enviromental Management Plan (CEMP) and an Outline Construction Traffic Mitigation Plan (OCTMP) which will set out the mitigation and control measures. These plans will be discussed and agreed with the relevant authorities. Green GEN Cymru will liaise with local communities in advance of and during construction of the Project. The ES will also provide a greenhouse gas assessment (incorporating the materials used during construction such as steel and concrete). With regards to the use of concrete, the footprint of the pylons proposed for the Vyrnwy Frankton connection will be modest. Further information is provided in

Topic	Summary of matters raised	Green GEN Cymru's response
		Chapter 2 of the PEIR and on the ''Typical Tower and Foundation Designs' drawings which are part of the consultation materials. As part of the ongoing routeing and design process, we have taken biodiversity interests into account, seeking to avoid important or sensitive habitats and known wildlife sites, including designated areas. Field surveys are continuing and providing further baseline data on habitats and protected species, including birds. Breeding bird surveys and flight activity surveys are underway and the initial results are included in the PEIR. Survey information will inform the assessment and mitigation which will be presented in the ES that will accompany the application. All bird nesting sites would be safeguarded during construction. The detailed Construction Environmental Management Plan (CEMP) which will be in place during the construction phase of the Project will include a Soil and Peat Management Plan.
Historic Environment	A few respondents raised concerns about protecting heritage assets. Particular reference was made to the home of the Prince of Wales in Meifod, the	As we develop our projects, we consider the potential for harmful effects to the historic environment and its component heritage assets. The potential for harmful effects has been considered both in terms of those which may stem from direct physical effects and those from change in the setting of assets. We also explore the potential for harmful effects to be mitigated. We also consider other environmental and technical considerations including landscape and visual, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses.

Topic	Summary of matters raised	Green GEN Cymru's response
	seat of the Prince of Powys at Mathrafal and Offas Dyke. Respondents also felt that the proposal would be intrusive at these sites and could discourage both locals and tourists from enjoying them.	How the route would interact with heritage assets at Meifod has been considered during the routeing phase of the project with a focus on avoiding harm to assets through charging their setting. Avoiding potential harm to these assets has been a key factor in the development of the draft alignment. Potential effects will be subject to further review following feedback on the draft alignment and further fieldwork and assessments as part of the ongoing design process prior to the application for a DCO being made. The outcome of the assessments (including cultural heritage and socio-economics) will be presented in the ES which will accompany the application
Impact on wildlife and habitats (including animal species and habitats)	A few respondents raised concerns about wildlife and habitat. Respondents noted red kites, osprey, curlew, and bats as native to the Meifod valley and Shropshire, which could be at risk due to the projects. Respondents noted the construction and operation of the overhead lines may	As part of the ongoing routeing and design process, we have taken biodiversity interests into account, seeking to avoid important or sensitive habitats and known wildlife sites, including designated areas. As part of the ongoing routeing and design process, we have taken biodiversity interests into account, seeking to avoid important or sensitive habitats and known wildlife sites, including designated areas. Field surveys are continuing and providing further baseline data on habitats and protected species, including birds. Breeding bird surveys and flight activity surveys are underway and the initial results are included in the PEIR. Survey information will inform the assessment and mitigation which will be presented in the ES that will accompany the application, All bird nesting sites and bat roosts would be safeguarded during construction.

Topic	Summary of matters raised	Green GEN Cymru's response
	damage the habitats these species live in. Respondents also questioned why ecological surveys have not been carried out to inform the routeing of the project, stating the Green GEN Cymru had not even adequate concern for habitat and wildlife when developing the proposals. Respondent were concerned about ancient woodland	Areas of woodland has been avoided where possible. Careful micro-siting has, where possible, positioned pylons, which are taller in height to achieve the required clearance over areas of ancient woodland, and to minimise any required works to trees and woodland. The draft alignment crosses the Afon Banwy where the ancient woodland strips along the riverbanks are narrow, and where the crossing can be made perpendicular to the river, minimising the amount of woodland that could potentially require work, however some trees may have to be cleared. The Environmental Statement which will accompany the application for a DCO will set out the potential significant effects on biodiversity of the Project. Green GEN Cymru will also consider opportunities to ensure the proposals contribute to a net biodiversity benefit in line with national policy and further details on this will be available as the Project develops. A full Biodiversity Net Gain (BNG) assessment will be provided as an appendix to the ES. The ES will also demonstrate how the approach will satisfy Welsh Net Biodiversity Benefit. For Biodiversity objectives. Baseline data has been and will continue to be collected in UK habitat classification typology. Calculations for both on and off-site biodiversity units pre- and post-development will be included within a BNG technical report to be appended to the ES. The quantitative outcome of the assessment will be dependent on the biodiversity units and linear units for the Project to achieve an overall net gain. The Project has committed to delivering a minimum of 10% BNG.

Topic	Summary of matters raised	Green GEN Cymru's response
Carbon	A small number of respondents raised questions regarding the carbon emissions produced during the construction of the project. They commented that the production of the steel needed for the pylons would outweigh the benefits of transmitting renewable energy. A small number of respondents were concerned that the potential loss of green spaces could have a negative impact on reaching net zero targets	In general, the main materials used in the construction of an overhead line include sand, stone, cement, steel reinforcement bar, galvanised pylon steel, all aluminium alloy conductors, composite insulators and optical ground wire. As Wales decarbonises, fossil fuel consumption in the heat and transport sectors will transition to electricity which may result in electricity consumption almost tripling by 2050. Electricity generation therefore needs to increase at pace to meet this need. Combining this with the ambition to reach net zero targets and decrease reliance on foreign fossil fuel sources, it is clear that Wales' renewable energy generation needs to accelerate to meet and maintain progress towards Welsh Government targets. Tackling the climate emergency, connecting new community and renewable energy projects, creating and expanding businesses and electrifying our heating and transport systems will all require additional grid capacity. These are challenge that the country faces, ones that need to be tackled urgently and ones that Green GEN Cymru are trying to help address. The project will reduce current grid capacity pressures by allowing direct connections for local energy users and energy generators. It has long been acknowledged by the Welsh Government, energy generators and network operators that a key challenge with respect to delivering Wales's net zero obligations, is the fact that the strongest renewable resources are generally in areas that have the lowest existing electricity network capacity, meaning that key strategic opportunities for renewable energy generation are currently sterilised. The production of steel therefore has to be balanced against

Topic	Summary of matters raised	Green GEN Cymru's response
		the need to move to net zero and connect new renewable generation to the grid. With regards to the potential loss of green space, the footprint of the pylons proposed for the Vyrnwy Frankton connection will be modest and loss of green space will be minor. The ES will include an assessment of potential loss of green space during construction and operation.
Land quality	They also expressed concerns about the noise and dust pollution related to the construction activities.	The potential impacts of the construction phase on the environment, including local communities will be assessed as part of the EIA for the Project. The ongoing design of the Project will be further informed by desk and field surveys to identify the environmental baseline (including noise, dust and traffic) and the Project will be designed to reduce construction effects where possible. The subsequent assessment of construction effects on the environment, including any additional mitigation measures to further reduce effects will be presented within the Environmental Statement (ES) to accompany the DCO application. A detailed Construction Environmental Management Plan (CEMP) will be in place during the construction phase of the Project. Green GEN Cymru will liaise with local communities in advance of and during construction of the Project.
Noise and vibration (including EMF)	A small number of respondents raised concerns regarding noise and vibration. They note that	High-voltage power lines can generate noise under certain conditions including: • Audible noise from overhead-line conductors and fittings is generally either a "crackle" or a "hum". It occurs mainly in wet weather, particularly fog and rain.

Topic	Summary of matters raised	Green GEN Cymru's response
	overhead lines can cause a vibrating or humming sound which may lead to noise pollution.	• Noise may also arise as a result of the wind blowing past the line or pylons. The impact of noise will be assessed as part of the EIA and where necessary mitigation measures will be identified.
Concern regarding ancient woodland	A small number of respondents raised concerns about the ancient woodland along the route. While respondents acknowledged that this has been considered, they suggested that there should be a focus on all types of woodland along the route	As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid important nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced through the siting of pylons. We also consider other environmental and technical considerations including landscape designations, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses. Areas of woodland has been avoided where possible. Careful micro-siting has, where possible, positioned pylons, which are taller in height to achieve the required clearance over areas of ancient woodland, and to minimise any required works to trees and woodland. The draft alignment crosses the Afon Banwy where the ancient woodland strips along the riverbanks are narrow, and where the crossing can be made perpendicular to the river, minimising the amount of woodland that could potentially require work, however some trees may have to be cleared.

Topic	Summary of matters raised	Green GEN Cymru's response
Concern regarding flooding	A small number of respondents expressed concerns about the potential for flooding in the area, specifically highlighting the Montgomery Canal and Llansantffraid as areas of concern.	Flood risk has been considered in developing the draft alignment and micro siting the pylons. A preliminary assessment has been undertaken to understand the potential impact of the Project on flood risk to or from the area and is presented in the PEIR. The ES will include a flood risk assessment. The Project design has considered the placing of ground-based infrastructure in mapped flood zones. Where this is unavoidable, for example where the span between pylons would be too great to enable them to operate safely, suitable mitigation will be employed such that necessary ground-based infrastructure (e.g. pylon bases) do not cause an increase in potential flood risk to up and/or downstream receptors. The Project is continuing to engage with relevant technical stakeholders on this topic. During the routeing process consideration was given to proximity to the Montgomery Canal, including the associated ecological designations and designated heritage assets. At Llanymynech, the draft alignment crosses an area of the Montgomery Canal which is designated as a SAC and a SSSI. The primary reason for the Montgomery Canal's designation as an SAC is the presence of floating water-plantain Luronium natans, and no other qualifying features are listed in the citation. This species of aquatic plant can be avoided through spanning and therefore no impacts to the qualifying features of the SAC will occur. The citations for the Montgomery Canal's status as a SSSI (Wales and England) describe a range of submerged and floating aquatic plant species as the reasons for the designation and these can be avoided through spanning. Brief reference is also made in the SSSI citations to the site being "of

Topic	Summary of matters raised	Green GEN Cymru's response
		importance in demonstrating aspects of the succession from open water to reedswamp and fen" and to areas of scrub, rough grassland and willow carr adjacent to the canal, which could also be avoided through spanning. Kingfisher, grass snake and otter are also mentioned and impacts to these species can be avoided through spanning and implementing standard mitigation measures at the detailed design stage. Whilst there will be landscape and visual effects as a result of the introduction of an overhead line in proximity to the Montgomery Canal at Carreghofa Locks, the draft alignment has been developed to maximise the potential for screening from existing vegetation and landform, and to avoid the pylons skylining. Screening by the existing vegetation and from the natural variations in landform will assist in reducing the magnitude of the likely landscape and visual effects. These considerations are in line with the Holford Rules. The Project will not impact proposals to improve the Montgomery Canal for recreational purposes as the overhead line will have sufficient height clearance and it will not affect navigation and moorings along the Canal. As the draft alignment approaches Llansantffraid, pylons have been sited to reduce visual effects on properties, while managing potential effects on the river and farm operations. Using straight alignments in the approach to and past the village has reduced the number of potential pylons. As the draft alignment reaches Llansantffraid the draft alignment is routed to the south to the village and the A495, close to the commercial area, reducing visual impacts on residential properties. The draft alignment is routed close to the commercial area to the south of the A495.

Topic	Summary of matters raised	Green GEN Cymru's response
Socio-economic		
Comments relating to the Community Benefit Fund	A considerable number of respondents provided comments regarding the Community Benefit Fund. Some suggested the funds and profits could be invested in undergrounding the cables, others suggested it could facilitate cheaper electricity bills along the route. Some respondents felt the fund was being used as a form of bribery for the local community, which lacked real economic benefits for	Green GEN Cymru is a wholly owned subsidiary of Windward Energy. Green GEN Cymru is a company registered in England and Wales with a head office situated in Cardiff. Bute Energy is also part of the Windward Energy group of companies. Bute Energy is developing proposals for renewable energy parks in Wales. Green GEN Cymru is an Independent Distribution Network Operator and is regulated by Ofgem. By hosting wind farm projects from Bute Energy, the communities closest to Green GEN Cymru's grid lines are also eligible to apply to Bute Energy's unique Community Benefit Fund. Worth millions of pounds per year, this money will be available to provide financial support for initiatives that improve the quality of life for community members, help secure clean energy independence, foster engagement, and address social and economic concerns – a unique approach in Britain. This fund is owned and administered by Bute Energy and decisions on how it is spent will be made by them. Please contact their Community Investment Team directly for more information.

Topic	Summary of matters raised	Green GEN Cymru's response
	the residents along the route. Others made suggestions for upgrading local infrastructure. This includes village hall, sports facilities, community events and art projects. Respondents also suggested funds to be used to improve public transport and develop cycle routes along the route. This could encourage greener travel. They also believed that the community benefit could be used as a way of connecting communities and improving broadband strengthen in rural areas.	

Topic	Summary of matters raised	Green GEN Cymru's response
Property price impacts	A few respondents expressed concerns about the impact on property prices. They noted that they had invested in the area due to its strong tourism appeal and were worried that this could be negatively affected. Respondents specifically cited a decline in the quality of the landscape and the area's rural character as potential causes for a decrease in property values.	It is very important to us that people respond to the consultation and tell us their concerns so we can work to reduce effects on communities and individual properties. Once we have a final design, Green GEN Cymru will speak with landowners affected on a one-to-one basis and to discuss how they can be supported. Green GEN Cymru will work hard to reduce impacts on individual properties but if the final design does impact properties and will discuss what compensation is available in line with current legislation. Recent reports have suggested that property prices are not affected by the presence of overhead power lines.
Community opportunities	A small number of respondents discussed the possibility of community opportunities. Some	The Project is in the early stage of development and procurement for construction will not take place for several years. Despite that, Green GEN Cymru are already making approaches to Welsh companies to ensure they would be ready for construction and would welcome any contact from Welsh businesses to discuss how they can be involved in the project. Green GEN

Topic	Summary of matters raised	Green GEN Cymru's response
	suggested that local residents should receive a discount on their electricity bills. Others discussed the process of construction and argued that local contractors will not be given the opportunities to take on these contracts as bigger firms will be used instead.	Cymru are committed to talking to a variety of suppliers to understand the options and decide based on availability, quality and price. In the construction of its projects Green GEN Cymru will prioritise local supply chains. Contracts will include partners signing up to a social value standard, investing jobs, time and resources in the area. Green GEN Cymru is an Independent Distribution Network Operator (IDNO) and is regulated by Ofgem. As an IDNO, Green GEN Cymru cannot independently offer discounts on electricity bills to residential customers. The responsibility for billing and offering discounts lies with energy suppliers, not IDNOs By hosting wind farm projects from Bute Energy, the communities closest to Green GEN Cymru's grid lines are also eligible to apply to Bute Energy's unique Community Benefit Fund. Worth millions of pounds per year, this money will be available to provide financial support for initiatives that improve the quality of life for community members, help secure clean energy independence, foster engagement, and address social and economic concerns – a unique approach in Britain. This fund is owned and administered by Bute Energy and decisions on how it is spent will be made by them. Please contact their Community Investment Team directly for more information.
Impact on agriculture	A few respondents expressed concerns	Throughout Wales and the wider UK, electricity connections have been sited and are operating within agricultural land.

Topic	Summary of matters raised	Green GEN Cymru's response
(including loss of arable land)	about the impact on agriculture, noting that farming is essential to the local area. They suggested that the effects of the route on agricultural land may not have been fully considered. Some respondents mentioned that the proposal would impact their own farms, while others emphasised that the ability to produce local goods is important and should not be restricted.	Grazing can continue up to and within the footings of the pylons, which take up a small area. There is no evidence that overhead lines and pylons have a materially adverse impact on livestock or grazing behaviour. It is anticipated the normal farming practice will be able to continue under the overhead lines or over cables (except in the footprint of the pylons themselves). The footprint of the pylons proposed for the Vyrnwy Frankton connection will be modest (further information is presented in Chapter 2 of the PEIR and on the ''Typical Tower and Foundation Designs' drawings which are part of the consultation materials. Green GEN Cymru will work closely with farmers in developing the Project to understand their concerns and to reduce any effects on their operation of their land.
Leisure and recreation (including horse riding, cycling, camping and caravanning)	A small number of respondents noted concerns regarding the availability of leisure and recreation areas. For example, the	The Preferred Route seeks to avoid or minimise effects on receptors leisure and recreational facilities (including public rights of way). Careful micro-siting of the draft alignment has positioned pylons to reduce effects where possible. Throughout the routeing process to date, we have sought to reduce the potential for effects on views experienced by tourists and visual amenity has been considered, where possible, on balance with other environmental

Topic	Summary of matters raised	Green GEN Cymru's response
	importance of Public Rights of Way and the launching of hot air balloons.	constraints. Views from tourism and recreation sites and routes is one of the landscape and visual appraisal criteria used to inform the selection of the Preferred Route and develop the draft alignment. This information is presented in the Routeing and Consultation Document which was presented at the non-statutory consultation and in the PEIR and the Route Alignment Document which firm part of the materials for the statutory consultation. Green GEN Cymru will continue to consider the visibility from tourism and recreation sites and routes during the ongoing design and assessment. Pylons are used across the UK in areas of high amenity value where people work and visit, and we are confident that with careful routeing we can reduce the potential impacts. The potential impacts of the construction phase on the environment, including leisure, recreational facilities, and public rights of way will be assessed as part of the EIA for the Project. The ongoing design of the Project will be informed by further desk and field surveys and the Project will be designed to reduce construction effects where possible. The subsequent assessment of construction effects on the environment, including any additional mitigation measures to further reduce effects will be presented within the ES which will accompany the application for a DCO. A detailed Construction Environmental Management Plan (CEMP) will be in place during the construction phase of the Project. During the construction disruption to PRoW will be minimised where possible by providing safe access, partial access or diversions of an appropriate length. Should temporary closures be unavoidable, temporary diversions will be clearly marked at both ends with

Topic	Summary of matters raised	Green GEN Cymru's response
		signage explaining the diversions and the duration of the diversion, and a contact number for any concerns. A PRoW Management Plan would be agreed and submitted with the application for Development Consent which will detail any required closures of PRoWs, which would be the last resort if a safe diversion cannot be provided. Green GEN Cymru will liaise with local communities in advance of and during construction of the Project. During operation and maintenance effects will be minimal.
Business impacts (including loss of business /operations)	A small number of respondents raised the issue of business impacts for those along the route. Respondents cited specifics such as free range poultry farms.	As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid important nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced through the siting of pylons. We also consider other environmental and technical considerations including landscape designations, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses. Throughout the routeing process to date, we have sought to reduce the potential for effects where possible on local businesses, including farming businesses. The potential impacts of the Project on the environment, including local businesses will be assessed as part of the EIA for the Project. The ongoing design of the Project will be informed by further desk and field surveys and the Project will be designed to reduce effects where possible.

Topic	Summary of matters raised	Green GEN Cymru's response
Impacts on tourism	A few respondents mentioned the potential impact on tourism. They noted that the area's appeal relies heavily on its picturesque views and rural countryside, suggesting that the introduction of pylons could negatively affect the local economy, which is largely dependent on tourism. Respondents noted specifics such as the village of Llansantffraid, which has caravan parks and pubs that cater largely to tourists.	Throughout the routeing process, we have sought to reduce the potential for visual effects, including consideration of views experienced by tourists, where possible, whilst balancing other environmental constraints. Views from tourism and recreation sites and routes is one of the landscape and visual appraisal criteria used to inform the selection of the Preferred Route and develop the draft alignment. This information is presented in the Routeing and Consultation Document which was presented at the non-statutory consultation and in the PEIR and the Route Alignment Document which firm part of the materials for the statutory consultation. Green GEN Cymru will continue to consider the potential visual effects on tourism and recreation sites and routes during the ongoing design and assessment stages. Effects associated with the construction and operation of the Project on tourism-related receptors will be assessed as part of the EIA process, and additional measures will be proposed to further reduce effects as appropriate. The findings of the EIA will be presented within the ES which will be submitted as part of the DCO application. Effects on tourism information will be presented in the landscape and visual and socio-economics chapters of the ES. The distance of the route from Llansantffraid and the assets mentioned including the school has been considered during the routeing phase of the project. As the draft alignment approaches Llansantffraid, pylons have been sited to reduce visual effects on properties, while managing potential effects on the river and farm operations. Using straight alignments in the approach to and past the village has reduced the number of potential pylons. As the draft

Topic	Summary of matters raised	Green GEN Cymru's response
		alignment reaches Llansantffraid the draft alignment is routed to the south to the village and the A495, close to the commercial area, reducing visual impacts on residential properties. The draft alignment is routed close to the commercial area to the south of the A495.
Broad concern on local impacts	A small number of respondents shared broad concerns over local impacts. Respondents added that the proposals may change the character of the area, and this would impact future generations. Some felt they had been stewards of the area and that it should be protected from potential industrialisation.	The objective of the routeing process undertaken to date has been to seek to avoid or reduce effects on the environment, including people who live, work, undertake recreational activities, as well as visit, the local area. Green GEN Cymru seek to continue to avoid or reduce effects on the environment, and associated tourism receptors, such as landscape and visual effects, and traffic and transport effects during the ongoing design of the Project. Effects associated with the construction and operation of the Project will be assessed as part of the EIA, and if required additional measures will be proposed to further reduce effects. As we develop our projects, we consider the landscape and visual impacts of the overhead lines and how these can be minimised through careful routeing and siting, for example seeking to avoid important nationally designated landscapes and proximity to towns and villages, and potential for effects to be further reduced through the siting of pylons. We also consider other environmental and technical considerations including landscape designations, ecology and ornithology, hydrology and peat, historic environment, ancient woodland, forestry, agricultural land and other land uses.
Health		
EMF - health impacts	A few respondents expressed concerns	Any use of electricity involves exposure to electric and magnetic fields. This includes switching on a light bulb, using an oven or watching the TV. What is

Topic	Summary of matters raised	Green GEN Cymru's response
	about the potential health impacts of EMF waves. Respondents commented they are concerned about the proximity of the route to houses, businesses and schools, due to the EMF waves produced by the connection. Respondents cited that proximity to EMF waves may have been linked with health conditions such as cancer.	considered a 'safe' level of exposure is a decision taken by the government and is subject to advice from the Health Protection Agency and international governing bodies. Data from the Energy Networks Association currently shows that EMF exposure from walking under a 132kV line is the same as walking passed a microwave that is turned on and in use. A vast amount of independent research has been undertaken into the possibility of health effects, without establishing any risks at the levels for the 132kV infrastructure we are proposing. As such, it is considered a safe level of exposure. For further information on EMFs, we encourage you to view information made available by the UK Health Security Agency. https://www.gov.uk/government/collections/electromagnetic-fields Green GEN Cymru will develop our networks in accordance with advice published authoritative and independent scientific organisations, such as the World Health Organization (WHO) and the UK Health Security Agency (UKHSA) and will comply with these guidelines.
Mental health impacts of the proposals	A small number of respondents provide comments stating how the proposals had impacted their mental wellbeing due to stress. Other	Green GEN Cymru recognises that new infrastructure can be disruptive to communities and stakeholders. We are committed to doing everything we can to cause the least disturbance to the environment and those who live, work and enjoy recreation close to our proposals. In 2018, the Government published 'Health Matters: Reducing Health Inequalities in Mental Illness' (Ref 16.25), emphasising that individuals with

Topic	Summary of matters raised	Green GEN Cymru's response
	respondents suggested the visual amenities and the landscape offers people a place to improve mental wellbeing and do not want it to be negatively impacted by the proposals.	severe and enduring mental illness are at a higher risk of poor physical health and reduced life expectancy compared to the general population. The report highlights that mental health issues can impact anyone and have significant effects on society at large. It acknowledges a wide range of mental health conditions and disorders, with common conditions such as depression and anxiety affecting one in five people. Mental wellbeing, mental illness, and mental distress are interconnected, with a clear link between loneliness and poor mental and physical health. Green GEN Cymru will complete an assessment that will consider potential mental health impacts arising from the Project during construction, specifically in relation to the protective factors of mental wellbeing identified in the Mental Well-being Impact Assessment toolkit: enhancing control, increasing resilience, facilitating participation and promoting social inclusion. This will include consideration of control-related place-based impacts such as neighbourhood quality, as well as resilience-related risk-based impacts. Stakeholder engagement and public consultation are key aspects of participation and inclusion. Where possible Green GEN Cymru will provide mitigation to reduce impacts to those who live, work and enjoy recreation close to the proposals. This will include a comprehensive community liaison arrangement and strategy detailed in the CEMP which will be applied to address the potential concerns and provide certainty on Project information to inform public perceptions and understanding.
Consultation		

Topic	Summary of matters raised	Green GEN Cymru's response
Consultation general (experience of)	A considerable number of respondents commented on the general consultation experience. Some felt the public consultation process was a 'tick box' exercise and that Green GEN Cymru does not take community feedback into consideration. Some also felt the consultation felt rushed and was not long enough for the community to engage with the proposals. Respondents expressed concern that the information presented during the consultation was biased towards the	Green GEN Cymru attaches great importance to the effect that its work may have on the environment and local communities. We are committed to providing clear and up-to-date information on our proposals and listening to local people and consulting them at each stage where their views can help to shape the proposals before consent applications are submitted. We consulted in the early stages of the Project to ensure that communities and stakeholders could view the proposals and have the opportunity to provide feedback and insight at the formative stage of the proposals that we could use to influence the Project's development. All of the feedback received to the non-statutory consultation was reviewed and is summarised in this report. Where feedback has influenced the ongoing design of the project, this will be communicated in the documents produced for the statutory consultation (such as the consultation brochure). The non-statutory consultation was six weeks long, which is in excess of the statutory minimum requirement of 28 days. Duration of the consultation, and publicity of the consultation will be considered for the statutory consultation to provide communities with time to respond to the proposals. Given the scale of the proposals, the approach taken was for community events, rather than one-to-one meetings as these offered visitors opportunity to see project materials and talk to a range of specialists. For those visiting events and preferring to talk in a more private setting, small breakout areas were created to the side of the main event where the venue had space to do this. We

Topic	Summary of matters raised	Green GEN Cymru's response
	use of overhead lines. Some respondents suggested one-to-one meetings would be beneficial and help people understand the proposals in more detail. Other respondents provided comments expressing they felt the consultation was helpful and informative. The staff and the events were friendly and knowledgeable.	also offered to meet face to face with landowners or their appointed land agents both during and after the consultation. For those visiting events and preferring to talk in a more private setting, small breakout areas were created to the side of the main event where the venue had space to do this. To ensure the consultation was as inclusive as possible, a range of communication channels were set up and utilised to ensure consultees to access more information about the Project and provide informed feedback. The non-statutory consultation held between September and October 2023 was to seek feedback on the proposed route for an overhead line through Powys and Shropshire, at this stage pylon locations were not proposed as the route could changes. Feedback to the consultation together with the findings of Green GEN Cymru's own assessments have influenced the development of the draft alignment which is being presented at the statutory consultation.
Event locations and formats	A small number of respondents commented on the event locations and formats. Some respondents suggested that an	We consulted in the early stages of the Project to ensure that communities and stakeholders could view the proposals and have the opportunity to provide feedback and insight at the formative stage of the proposals that we could use to influence the Project's development. Our phase one non-statutory consultation on the Preferred Route ran for six weeks from 6 September to 18 October 2023. The six week period was longer

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	eight week consultation period would be more appropriate, respondents also suggested that the events needed to run longer to allow further flexibility for those who wished to attend. Some respondents also asked that there be more notice of the events in future.	than the period required for statutory consultation, but we felt the extended period was important to ensure that people had enough time to meet the Project team at a face-to-face events to ask questions, and to ensure there was sufficient time for people to respond to the consultation. Green Gen Cymru's approach to consultation also includes an ongoing programme of engagement outside of the defined phases of consultation. We wrote to those landowners who our research indicated may have a legal interest to introduce Green GEN Cymru and inform them of our proposals. We also offered to meet face to face with landowners or their appointed land agents. We understood the consultation period was a busy time for landowners and farmers and we therefore offered landowners the opportunity to meet during and after the consultation. The Project has continued to be open to meetings in the period between consultation. To ensure the consultation was as inclusive as possible, a range of communication channels were set up and utilised to ensure consultees to access more information about the Project and provide informed feedback.
Consultation materials	A considerable number of respondents commented on the materials produced for the consultation. Some expressed that they would have liked	Green GEN Cymru feel that the consultation information was clear, and that good engagement took place. However, we note the feedback received and Green GEN Cymru will bear comments in mind when organising our next consultation. People were able to contact the Project team through a dedicated Project email address, telephone number and Freepost address through which people could ask questions about the Project or the consultation.

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	to have seen more detail about the proposals, including information about the construction of the route. They also suggested the content of the materials were misleading and not transparent. Respondents requested more detail regarding, impacts, costs and pylon locations. Respondents expressed concern about the website, stating it was difficult to navigate on a phone. They also noted the interactive map's clarity could be improved by	Green GEN Cymru were at a very early stage of our proposals for the Vyrnwy Frankton connection. The initial consultation helped gather feedback to inform the project. Further details are now being resented as part of our statutory consultation. The comments regarding using the website on a phone have been noted.

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	including village names and other landmarks and providing a 3D model of the route to help people understand the proposals. Others commented that the materials were useful and informative.	
Communication channels	A small number of respondents expressed concern regarding the adequacy of Green GEN Cymru's communications channels. They felt the consultation was not publicised enough. Some respondents suggested that the consultation should have been advertised	To ensure the consultation was as inclusive as possible, a range of communication channels were set up and utilised to ensure consultees to access more information about the Project and provide informed feedback. At the start of the non-statutory consultation, Green GEN Cymru launched a dedicated consultation website for Green GEN Vyrnwy Frankton - https://greengenvyrnwyfrankton.com/en/. The website provided an interactive map detailing the Preferred Route, FAQs, and technical documents. Noting the challenges some consultees experienced with the website, website structure and navigation will be considered for subsequent consultation. People were able to contact the Project team through a dedicated Project email address, telephone number and Freepost address through which people could ask questions about the Project or the consultation.

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	in the Shropshire Star. Others felt that Green GEN Cymru has made the website deliberately difficult to navigate to prevent people from engaging with the proposals and consultation.	The consultation was widely publicised in the area. At the start of the consultation, a consultation leaflet was sent to all addresses within a consultation zone (approximately 1km area around the preferred route). This leaflet contained information on the Project and consultation, including contact information and details of the dates, times and location of the drop in events and webinars. We also advertised in local newspapers with details of the consultation, including the Shropshire Star and County Times. Adverts were in print and online. We held six public drop-in events during the consultation, held in carefully chosen locations along the route to allow people to attend an event local to them. We also held two online webinars so that people could put questions to the Project team, should they not be able to attend an event. Details of these were also available on the Project website.
Stakeholder engagement	A few respondents commented on stakeholder engagement stating that it would be beneficial to have a longer period of engagement and more events. Some respondents commented that they	The phase one non-statutory consultation on the Preferred Route ran for six weeks from 6 September to 18 October 2023. The six-week period is longer than the period required for statutory consultation, but Green GEN Cymru felt the extended period was important to ensure that people had enough time to meet the Project team at a face-to-face events to ask questions, and to ensure there was sufficient time for people to respond to the consultation.

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	would prefer further in depth face to face conversations, with more notice of the events so that more people could attend.	

Ends