GREEN GEN TOWY TEIFI

Consultation March 2025

Routeing and Consultation Document

GREEN GEN CYMRU

www.greengentowyteifi.com

Contents

Contents

TABLES

FIGURES

1 INTRODUCTION

Background

1.1 In January 2024, Green Generation Energy Networks Cymru (Green GEN Cymru) published a Routeing and Consultation Document to inform consultees of a new 132 kilovolt overhead line supported on 'L7c' steel lattice towers or similar (hereafter 'the Project'). It will connect the proposed Lan Fawr Energy Park to the northeast of Lampeter to a new 400 kilovolt National Grid substation (known as the Llandyfaelog Substation) southeast of Carmarthen. The Project will also provide opportunities for other green energy infrastructure to connect to the national transmission network. The Routeing and Consultation Document sets out the possible corridors within which the Project may be located and identifies a corridor that is considered environmentally preferable and technically feasible (the 'Preferred Route Corridor'). A description of the Preferred Route Corridor, together with information on Green GEN Cymru and the need for the Project to support renewable energy transmission and distribution across Wales, is provided in the Routeing and Consultation Document, which is available to read on the Green GEN Cymru website[1].

1.2 Since the publication of the Routeing and Consultation Document, Green GEN Cymru has worked with engineers, environmental specialists, statutory consultees[2] and land referencing agencies to develop a **Draft Route Alignment**, which includes the proposed overhead line alignment, preliminary tower locations and preliminary underground locations. This process has drawn extensively on feedback received from the public following Green GEN Cymru's first round of non-statutory public consultation held between January and March 2024.

1.3 This Stage 2 Routeing and Consultation Document is intended to inform consultees of the Draft Route Alignment that has been developed. It provides an overview of the routeing work undertaken since the last public consultation events, describes the Draft Route Alignment and explains the reasons for selecting it. It also describes the process for the next round of non-statutory consultation, to enable consultees to provide feedback on the latest proposals, which will be used to inform the design of a final detailed route alignment.

The Project

1.4 The Project will connect into the onsite substation for the proposed Lan Fawr Energy Park, which will consist of approximately 40 wind turbines. Information on the Lan Fawr Energy Park, which is a separate development proposal, is available from the project

[1] Green+GEN+Towy+Teifi+RCD.pdf

[2] Preliminary discussions have been held with Natural Resources Wales, Cadw, Ceredigion County Council, Carmarthenshire County Council and Planning and Environment Decisions Wales. These discussions will continue over the course of the next 12 months, alongside a range of site surveys, to further refine the Project.

website (www.lanfawrenergypark.wales). The onsite substation will form part of the Lan Fawr Energy Park Development of National Significance consent application, which will outline the location, design and environmental effects of the proposals. The onsite substation is therefore not considered further in this Stage 2 Routeing and Consultation Document.

1.5 The Project will terminate at a new Green GEN Cymru 132 kilovolt switching station located on the proposed National Grid Electricity Transmission (NGET) Llandyfaelog Substation[3] platform. The Llandyfaelog Substation will connect the electricity transmitted by the Project to the national transmission network, for transmission across Wales and beyond. National Grid will be sharing plans about its proposals at its public consultation events in 2025, ahead of submitting a planning application to Carmarthenshire County Council later in the year. The approximate location of the NGET substation and Llandyfaelog switching station is shown on Figure 1.1.

1.6 The Project will also provide opportunities for other green energy infrastructure to connect to the national transmission network. It will comprise a double circuit overhead line, with overhead conductors supported on 'L7c' steel lattice towers (or similar) with six cross-arms (three on each side).

1.7 The types of steel lattice towers that will be used for the Project are as follows:

- Suspension towers, used to support overhead lines along straight sections of the connection route;
- Angle towers, used mainly (but not exclusively) to support overhead lines at points where the route changes direction, usually requiring a slightly larger area for construction than standard suspension towers; and
- Terminal towers, used where the OHL terminates into a substation or into an underground cable section via a separate cable sealing end compound or platform.

1.8 Further information on the components and construction of the towers and overhead line, and ancillary development, is provided in the Routeing and Consultation Document 2024[1].

1.9 In developing the Draft Route Alignment, Green GEN Cymru proposes the use of underground cables in two areas:

- The Afon Tywi (River Towy) valley: using underground cables to cross this particularly sensitive area would reduce the potential for effects on the views, landscape and wildlife; and
- Line entry into the switching station at the proposed Llandyfaelog Substation: using underground cables will allow the Project to navigate constraints associated with existing infrastructure at this location, the proposed Towy Usk 132 kilovolt connection; and physical constraints such as buildings.

[3] https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/llandyfaelog-substation

1.10 Typically, underground cable is a less preferred option for several reasons, but principally due to the high cost of construction and the likelihood of a greater environmental impact, it being a more intrusive method of construction with a greater risk of environmental damage to soils, habitats, archaeology, water quality and hydrological regimes. The area of land needed to accommodate construction equipment, materials and excavated soils during cable installation, sometimes referred to as the construction swathe, can be quite wide meaning a significant amount of vegetation clearance may be necessary. In addition, operational maintenance of underground cables is a lengthier and more costly process compared to the maintenance of overhead lines, resulting in more curtailment of electricity transmission. As such, the Draft Route Alignment only includes underground cables where the benefits are considered to outweigh impacts.

1.11 Cable sealing ends are required wherever underground cables are joined to overhead line conductors to allow the safe transfer of energy from one medium to the other. These can be sited within a cable sealing end compound or be on a platform fixed on a terminal tower. The overall scale of a cable sealing end compound or platform can be more visually intrusive than standard towers, which is considered in determining the best location to start and end a section of underground cable. Given the power rating of the connection, the Project will use cable sealing end compounds due to the size of the equipment needed.

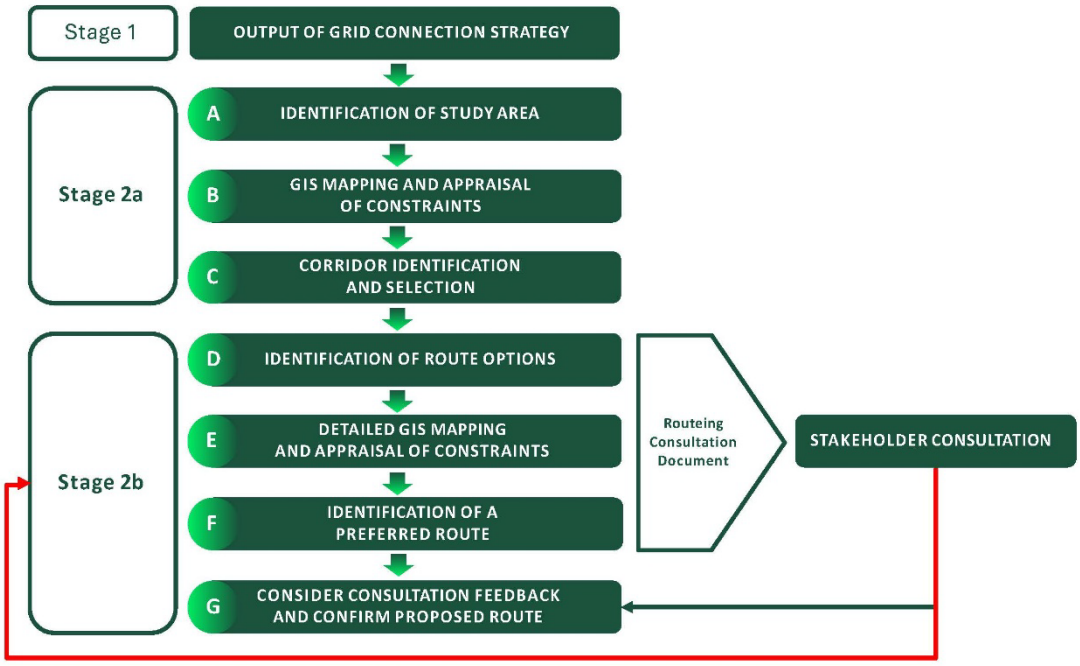
1.12 It is desirable to locate cable sealing end compounds on relatively flat ground, to minimise the ground works (cutting and filling) needed during installation. In addition, they should be positioned to allow the underground cables to follow a straight alignment between two cable sealing end compounds as much as possible to minimise the amount of pulling force created by bends in the cable.

1.13 It is preferable to keep the length of underground cable to a minimum to reduce the number of joint bays required and ensure long term durability, safety and reliability. Issues such as soil erosion, high humidity and water intrusion can weaken cable joints and potentially cause electrical failures.

2 GREEN GEN CYMRU APPROACH TO ROUTEING

2.1 Green GEN Cymru's 'Approach to Routeing Grid Infrastructure in Wales'[4] document is designed to establish a consistent methodology for the routeing of connection projects and to support subsequent Environmental Impact Assessment (EIAs) of all Green GEN Cymru's grid connection projects. This Stage 2 Routeing and Consultation Document is the second output of Stage 2b of the route selection process, as indicated in red in Figure 2-1 below.

Figure 2-1 Green GEN Cymru route selection process



2.2 The Stage 2 Routeing and Consultation Document presents the routeing work undertaken to provide a Draft Route Alignment, which takes into account public feedback on the Preferred Route Corridor. The Draft Route Alignment forms the basis of the second round of public consultation in March 2025. It includes a greater level of detail, such as preliminary tower positions, overhead line and underground cable alignments, and indicative locations for cable sealing end compounds.

[4] I https://greengentowyteifi.com/en/documents/

2.3 During this phase of routeing, the need to include a 'Limit of Deviation'[5] within the site boundary that will be submitted for planning approval has been considered. An indicative Limit of Deviation will be necessary as follows:

- For overhead lines: sufficient space either side of the centre line to allow for physical positioning of tower structures and swing clearance for conductors; and
- For underground cables: sufficient space either side of the centre line to allow for physical positioning of towers and cable sealing end compounds, as well as a construction swathe, the size of which will depend on different factors, including the methodology to be used for cable laying.

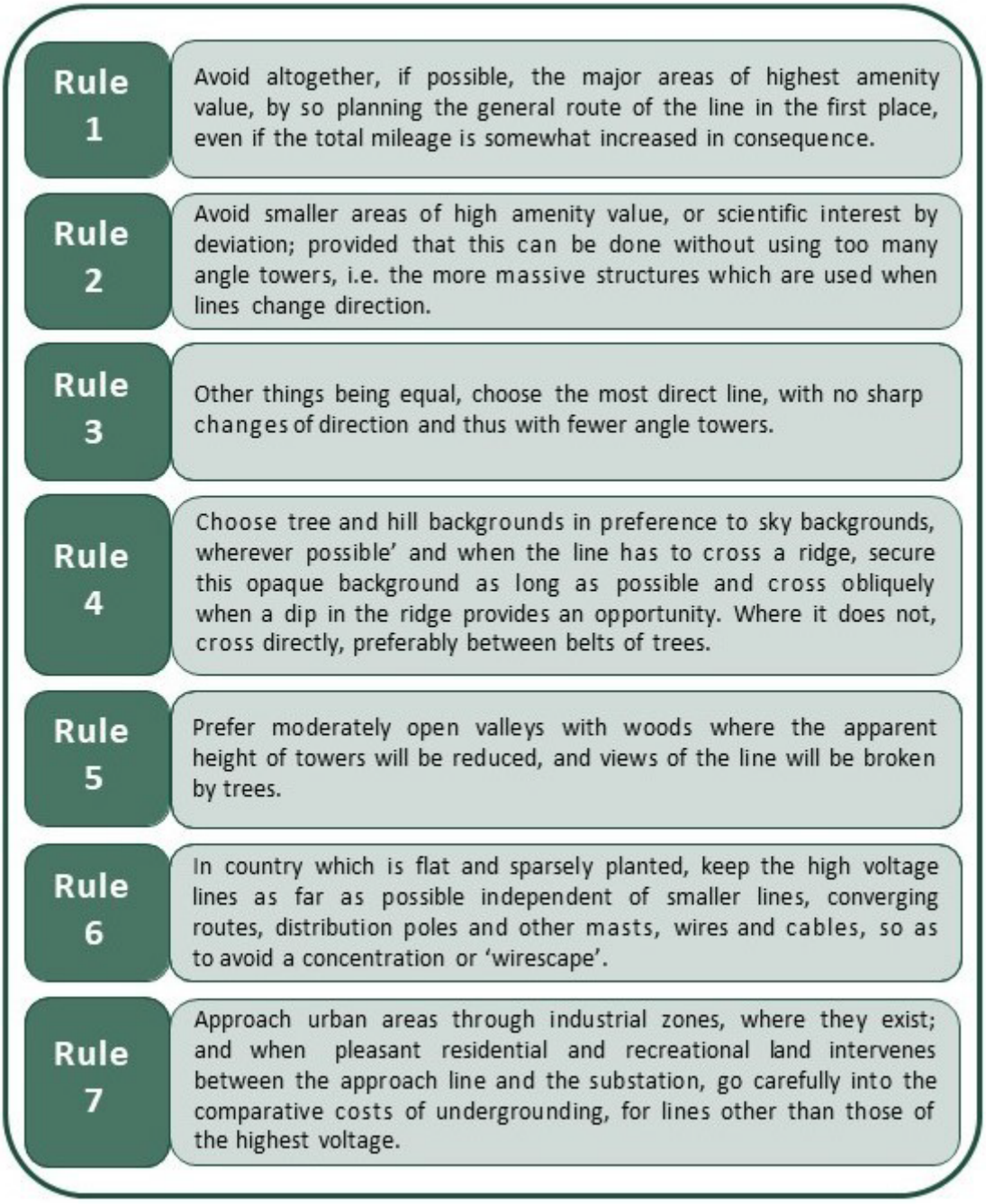
2.4 The Draft Route Alignment has been influenced by a range of technical factors, such as the tower type and height (e.g. terminal and angle towers), the terrain and degree of slope to be spanned, span lengths and required overhead safety clearances. Site-specific environmental and land use considerations also influence the Draft Route Alignment, such as proximity to residential properties, ground conditions, extent and maturity of woodland and other habitats to be crossed, and proximity to watercourses. Further details of environmental and land use considerations are provided in the Routeing and Consultation Document 2024[1].

The Holford Rules

2.5 The identification of a Preferred Route Corridor during the first round of the route selection process followed established guidelines developed by the late Lord Holford in 1959 (hereafter 'the Holford Rules'). In developing a Draft Route Alignment during this second round of the route selection process, the Holford Rules continue to be a key factor in determining the most appropriate location for towers and overhead lines. A summary of the Holford Rules is provided below, with a fuller text provided in the Routeing and Consultation Document[1].

[5] The Limit of Deviation is an allowance either side of the final detailed route alignment within the consented site boundary, which enables the appointed contractors on site to move pylons or other infrastructure to a slightly different position within the site boundary where this becomes necessary for engineering, safety or environmental reasons.

Figure 2-2 Summary of the Holford Rules



Environmental and land use considerations

2.6 A wide range of designated environmental features were avoided as much as possible as part of the identification of a Preferred Route Corridor, based on their mapped boundaries, for example Special Landscape Areas, Conservation Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Historic Landscapes. Some

National and International designations such as National Landscapes, National Parks and Special Protection Areas were avoided entirely.

2.7 This second round of the route selection process necessarily takes a more nuanced approach to account for aspects of the environment less readily assessed through GIS mapping alone and to account for information received from local communities and stakeholders. Environmental specialists have therefore worked closely with engineers and land referencing agents to determine a Draft Route Alignment that minimises environmental impact whilst balancing technical requirements, responds to stakeholder, local community and landowner feedback and adheres to the Holford Rules. A combination of expert opinion, industry guidance and research, and mapped datasets was applied.

2.8 The risk of causing direct impacts to the following key environmental features has been avoided in the first instance by routeing outside or away from them (where possible, balancing the routeing factors detailed above), and minimised where avoidance was not possible:

- Biodiversity:
  - Priority Habitats (terrestrial and aquatic);
  - Potential Sites of Important Nature Conservation;
- Woodland and forestry:
  - Ancient Woodland;
  - National Forest Inventory;
- Watercourses:
  - Main Rivers;
  - Ordinary Watercourses;
  - Flood zones;
- Geology and Soils
  - Agricultural Land Classification, Grade 3a and above;
  - Peatland;
  - Historic landfill sites;
- Cultural heritage:
  - Scheduled Monuments;
  - Listed Buildings;
  - Historic Parks and Gardens;
  - Potential for buried archaeology;
  - Historic Landscape Areas;
- Visual:
  - Settlements;
  - Individual properties;
  - Landscape;
- Land use:
  - Relevant committed development, e.g. residential consents;
- Housing, green space and mixed use local plan allocations;
  - Relevant extant planning applications;

2.9 Whilst GIS-based data continue to inform the approach to defining a Draft Route Alignment, aerial and street-side imagery has also been used together with results from visual inspections during a limited number of site surveys undertaken to date. This has been important, since the boundaries of certain features in mappable datasets are not always precise or sufficiently up-to-date to reflect a changing environment. Site surveys are continuing to confirm the mapped data and record the presence of sensitive receptors.

Technical engineering and economic considerations

2.10 Avoidance of environmental features in favour of a less sensitive location is not always feasible from an engineering or economic perspective. The presence of existing infrastructure such as transmission and distribution overhead lines, wind turbines, pipelines, railways and highways, as well as landscape factors such as topography, will influence the route selection, including the exact position and height of towers used.

2.11 Topography is a key consideration; clearance between the overhead line conductors and the ground and ground features must be achieved for safety and operational reasons. The topography of the land can affect how well clearance can be achieved, which influences tower position and/ or height. For example, it may be desirable to position two towers either side of the crest of a hill to minimise their visibility, however, it may not be possible to achieve the required clearance between the overhead line conductors and the hill crest (even with tower extensions).

2.12 Design considerations need to be carefully balanced and will depend on the characteristics of the site. It may be that clearance can be achieved by having two taller towers with a single long span between them, or three shorter towers with shorter spans between them. In such instances, the visual impact associated with the use of fewer, but taller towers needs to be weighed against the visual impact of a greater number of shorter towers. There are many other considerations, such as the comparative construction needs; timescales for construction, costs, available land area and accessibility are all key factors in the design process.

2.13 It is also desirable to ensure the alignment is as straight and direct as possible to reduce the number of angle towers used and prevent a zig-zag effect, in line with the Holford Rules. Angle towers are larger structures requiring a larger construction area. A more direct alignment also ensures the Project is constructed as economically as possible. For underground cables, the same approach is necessary to minimise the number of bends and joints that would be needed to change cable direction.

2.14 Key factors that have been considered in defining the Draft Route Alignment from an engineering perspective are:

- The potential presence of peat;
- Topography;
- Existing infrastructure such as roads, overhead lines, pipelines and buried cables;
- Watercourses and flood zones;
- Forestry;

- Dwellings and other buildings; and
- Physical ‘pinch points’ which could restrict the area available for the Limit of Deviation.

Mitigatory factors

2.15 The nature of the Project is such that only a small proportion of the total infrastructure is situated on the ground. The majority comprises overhead lines, which has the advantage of being able to oversail a range of environmental features. However, towers, underground cables and all associated access and construction infrastructure will have a direct impact on the ground.

2.16 Some adverse effects can be avoided or limited through careful routeing, including:

- Local deviations of the alignment or ‘micro siting’; and
- Careful siting of temporary access and construction infrastructure.

2.17 Any potential effects and mitigation will be identified and assessed during the Environmental Impact Assessment process, to inform the final detailed design of the Project. This will include temporary effects due to construction, such as noise, traffic and emissions to air and water, all of which can generally be mitigated using best practice construction methods. The residual impacts following mitigation of both temporary and permanent effects will be presented in the Environmental Statement, as part of the planning application.

Trees and woodland

2.18 Where trees and woodland cannot be avoided by the Draft Route Alignment, trees may need to be managed or felled. In some instances, oversailing is possible but some ‘topping’ or pruning of trees may be necessary to achieve the minimum safety clearance overhead. The ability to do this is dependent on the maturity, height and species of tree, and ongoing management will be required throughout the operational life of the Project. Where pruning alone cannot achieve the minimum safety clearance overhead, trees may need to be felled. Coppicing of oversailed trees will also be required for the stringing of the overhead line. Trees may also be felled to facilitate the delivery of the Project. In all instances, compensatory and additional tree planting will be provided to mitigate any tree loss and this will be completed at an appropriate ratio according to the maturity and species of tree..

Hedgerows

2.19 Loss of hedgerows can be avoided by oversailing, however, it will be necessary to remove some hedgerows to create temporary haul roads to allow construction equipment to pass between individual towers. Existing local accesses could be used in a small number of locations, however, this can be equally damaging to roadside hedgerows where entrances from the road need to be widened. To minimise the amount of hedgerow removal needed to create haul roads, gates between fields may be used in certain circumstances and hedgerows will be reinstated where feasible following completion.

Watercourses and flood zone

2.20 With one exception it is intended that all watercourses will be spanned[6], with towers situated outside of the flood zones where feasible. Where flood zones are extensive and tower placement within a flood zone is unavoidable, the number of towers within the flood zone will be minimised. Towers will be sited away from river banks in line with recommended ecological buffer distances, which can be up to 30 metres from the river bank, depending on the presence of certain protected species. Because angle towers require a slightly larger construction area, a larger buffer has been applied wherever possible.

Priority Habitats and potentially important habitats

2.21 Where it is necessary to cross Priority Habitats, such as rush pasture and purple moor grass, and other habitats that may be classed as Sites of Importance for Nature Conservation, the preference is to locate towers outside of their mapped boundaries. However, in some instances Priority Habitats are too extensive to be crossed by a single span and where this is the case, the number of towers within the Priority Habitats have been minimised.

2.22 It is possible that such habitats extend beyond the mapped boundaries in some locations, which has been evident in some aerial imagery. This will be investigated further through site-specific ecological surveys. Local deviations will be considered during the detailed design phase to minimise the amount of habitat affected, including woodland. In all instances, compensatory and additional habitat creation will be provided to mitigate any affected habitats.

Proximity to dwellings

2.23 The Draft Route Alignment avoids routeing over all settlements and isolated rural dwellings, including private gardens. Large settlements have been avoided, however, it is not possible to maintain a substantial distance from all isolated properties, which are widely scattered and of varying densities throughout the areas of the Project. Therefore, the Draft Route Alignment is in proximity to some dwellings. The objective of this Stage 2 route selection process is to avoid residential and other sensitive properties and where they cannot be avoided, to increase the distance between them and the overhead line to reduce the risks of direct impacts due to construction disturbance and visual intrusion.

2.24 Where the Draft Route Alignment is in proximity to dwellings, towers have been sited strategically to minimise any potential adverse effects. Key considerations include the orientation of the main elevation of a dwelling, topography and existing vegetation or structures that may provide visual screening. Where the Draft Route Alignment passes between scattered dwellings, towers have been sited equidistantly where this is considered to be a benefit, however, some properties will be closer than others due to other environmental or technical considerations previously described. The detailed

[6] The Afon Towy is an exception, whereby the width of the river and of the flood zone is too large to oversail. Therefore, it is proposed to install underground cables at this location.

design phase will aim to ensure that the Project can be screened from view as much as practicable for those in proximity to the Limit of Deviation, either by sensitive tower placement that respects the orientation of residential properties and avoids a direct line of sight, through existing vegetation or landform, or through additional tree planting at an appropriate distance mitigate the perspective.

Heritage assets

2.25 There are two aspects of the historic environment that may be affected directly or indirectly as a result of the Project. The first relates to the setting of historic assets, views from which can be important over long distances or between neighbouring assets. The level of effect is very much dependent on the nature of the asset, which is assessed through a combination of desk-based studies and site surveys. The potential for impacts to the settings of heritage assets has therefore been minimised during this Stage 2 of the route selection process by sensitive siting, such as by maintaining an appropriate distance between towers and historic assets, by using intervening topography to limit direct views of the Project or by ensuring tower placement does not interrupt a direct line of sight between assets.

2.26 Long term visual impacts can also be mitigated by using underground cables instead of overhead lines. Construction of underground cables is particularly invasive and has the potential to directly impact buried archaeology; maximising the distance between a buried cable and a heritage asset, particularly of ancient or prehistoric origins, reduces the risk of encountering buried archaeology that may be associated with that asset.

2.27 However, in order to install underground cables, cable sealing end compounds are required at the point of switching from overhead to underground and vice versa, which are more visually intrusive than a standard steel lattice tower.

2.28 There is potential for indirect impacts to historic assets where vegetation clearance is necessary to install underground cables. This may have the effect of removing natural visual screening and changing the existing setting of a receptor. This may not always be an adverse effect, particularly where sightlines between assets can be restored.

Best and most versatile agricultural land / peatland

2.29 Large parts of the Draft Route Alignment are in farmland and the need to protect best and most versatile agricultural land is reflected in Welsh planning policy. As part of this Stage 2 route selection process, land with an agricultural land classification of Grade 1 and Grade 2 has been entirely avoided. To a large extent, Grade 3a has also been avoided, although there are small areas where this was not feasible due to the presence of other, overriding constraints.

2.30 Soil surveys are proposed to be undertaken at key locations along the final detailed route alignment once consented, to confirm the quality and classification of soil at each tower location and underground cable section. This information will be incorporated into a Soil Management Plan, which will be followed by contractors to ensure there is no degradation of soil quality during construction. Where best and most versatile land is encountered, towers may be positioned strategically within the Limit of Deviation to keep as close to

field boundaries as feasible whilst maintaining the appropriate working areas, to minimise disruption to agricultural land uses associated with crop growing.

2.31 The Draft Route Alignment avoids all known areas of peat and this will be confirmed as part of the soil surveys and as part of the ecological surveys.

3 STAGE 2 ROUTE SELECTION METHODOLOGY

3.1 Green GEN Cymru recognises that at this point in the route selection methodology, corridor boundaries and route alignments are not fixed and there will be further amendments to the Project throughout the design process. Deviations from the Preferred Route Corridor and/ or future deviations from the Draft Route Alignment may be appropriate in some locations as a result of, for example:

- Public feedback;
- Consultation responses from statutory bodies such as Natural Resources Wales;
- Results from site surveys completed to date; and
- Results from desk-based study and third party data searches.

3.2 As the Project develops and more detail is known about the area proposed for the Project, there will be further design amendments, with the objective of defining a final detailed route alignment. It is an iterative process as shown in Stage 2b of the route selection process in Figure 2-1 above.

3.3 This document reports on the changes that have been made since the first round of public consultation and the reasons why.

Responding to public feedback

3.4 Following the public consultation events held in February 2024 at six locations between Lampeter and Carmarthen, local people and organisations were invited to provide feedback on the Preferred Route Corridor. Feedback responses were collated, anonymised and tabulated for analysis. Feedback that requested changes to the Preferred Route Corridor was taken forward for further consideration during this Stage 2 route selection process. In order to qualify as a viable change, requests were required to identify a specific place along the Preferred Route Corridor and a specific issue. Some examples are given below:

> *The Preferred Route Corridor goes directly over my house, which isn't shown on the map. Consider moving the line further south so it doesn't pass my address directly overhead.*
>
> *The Preferred Route Corridor has a sharp bend in it to go around some woodland, but it takes it closer to some houses. The trees are no longer there and the land is now used for livestock grazing. Can the route be straightened as shown in the attached drawing, to keep further away from the houses?*
>
> *I understand the route has been kept as far away from our village as possible, but it is on the hillside across the valley where it is more visible. It would be better to put it on the side of the valley closer to the village, where it will not be seen.*

3.5 Proposed amendments to the Preferred Route Corridor were drawn up to address each relevant feedback response and these amendments were considered by Green GEN Cymru in consultation with environmental specialists, engineers and land referencing

agents in a series of online workshops. Proposed amendments were compared with the Preferred Route Corridor in terms of potential environmental effects, technical feasibility and economic feasibility. The key criteria for determining whether the proposed amendment can be accommodated were:

- Whether or not it would lead to additional adverse environmental effects for any of the key environmental topics (as listed in paragraph 2.8 above);
- Whether or not it would lessen any adverse environmental effects arising as a result of the Preferred Route Corridor;
- Whether or not it would lead to significant additional costs associated with construction of the Project, for example, because it would create a much more indirect alignment; and
- Whether the change would add significant complexity to the construction of the Project,, for example, availability of viable access or presence of difficult terrain with steep slopes.

3.6 Following this process, the Preferred Route Corridor was remapped to reflect all amendments that were considered feasible. This newly aligned indicative route corridor formed the basis for Green GEN Cymru's engineers to develop initial alignment options, inclusive of tower locations, and provide alternative options where there may be an environmental, technical or economic benefit.

3.7 All feedback identifying the presence of a potentially sensitive receptor in a specific location (for example, a species of plant or animal) was recorded in a database so that it can inform future stages of routeing, siting and design, as well as guide environmental specialists in surveying certain areas along the Draft Route Alignment.

Preliminary design of Draft Route Alignment

3.8 The process of developing a Draft Route Alignment is focused on devising an initial alignment that corresponds with the Preferred Route Corridor, and devising alternative options where engineering or other reasons present more favourable routeing opportunities outside of the Preferred Route Corridor. At this stage, minor changes such as re-positioning a tower by a few metres within a field are not considered; such minor changes will be considered during the detailed design phase after the second round of public consultation. Instead, more fundamental changes to the alignment are considered to ensure they can meet the necessary design conditions.

3.9 An environmental appraisal of the initial alignment and alternatives was undertaken, covering each of the key environmental topics. A shared online working area allowed commentary from land referencing agents, engineers and Green GEN Cymru's project team to be incorporated into any proposed design amendments. Progressively more detailed inputs were made in a staged review process.

3.10 An engineering assessment analysed the proposed changes to the initial alignment and alternative options using PLS CADD, an industry-standard overhead line design program that integrates all aspects of line design, including:

- Terrain profiles;
- Conductor sagging and tension;

- Concentrated loads;
- Overhead clearances;
- Structure design;
- Tower spotting and stringing;
- Structure strength assessment; and
- Foundation loading.

3.11 A key objective of the staged approach described above was to ensure specialist input could be discussed and weighted in a proportionate manner. Professional judgement was used to ensure that, where a proposed change or alignment preference was not mutually acceptable, there is scope to avoid or mitigate the relevant concern during the detailed design phase. Consideration was given to the level of potential impact, drawing on relevant, topic-specific guidance and/or the relative level of policy protection that may or may not be afforded to the concern in question.

3.12 To ensure professional judgement was applied robustly and objectively, workshops were held, drawing on the expertise of environmental and technical specialists to clarify the degree of preference between alternative route options and to review the feasibility for mitigation during the detailed design phase.

3.13 The resulting Draft Route Alignment forms the basis of the second round of non-statutory public consultation that will be undertaken in early 2025 (refer to Chapter 9 below for more details). Further refinements to the Draft Route Alignment will be informed by ground-truthing field surveys, which will confirm the presence and extent of environmental features and other sensitive receptors.

4 LAN FAWR ENERGY PARK TO LAMPETER

Selection of Draft Route Alignment

4.1 There are 44 towers spanning a distance of approximately 9.8 kilometres between Lan Fawr Energy Park and Lampeter (towers 1 to 44). An alignment within the Preferred Route Corridor[7] has been largely retained, with some minor deviations. At Cwmann, a more easterly alignment away from the Preferred Route Corridor has been defined as a result of the Initial design process and in response to public feedback.

4.2 The key reasons for the selection of the Draft Route Alignment are as follows:

- It minimises visual impact on settlements;
- It directs the alignment away from an area of existing overhead lines; and
- It aligns with public feedback.

Draft Route Alignment: towers 1 to 13

4.3 The start of the Draft Route Alignment is indicative only and the final position will be dependent on the location, orientation and layout of the Lan Fawr Energy Park onsite substation, to which the overhead line will connect. Additional towers may therefore be required at this location.

4.4 Most of the Draft Route Alignment is within the Preferred Route Corridor, with minor deviations.

4.5 Angle towers have been used to navigate constraints, including:

- to divert the alignment through existing gaps in woodland;
- where woodland cannot be avoided, to divert the alignment across narrower parts to minimise tree loss;
- to create a more direct alignment to avoid the need for a heavy angle tower; and
- to reduce the extent to which mapped areas of Priority Habitat are crossed.

4.6 Oblique angle towers have been used instead of heavy angle towers, where feasible.

4.7 Towers have been positioned outside of mapped areas of Priority Habitat, although it is expected that this area comprises almost entirely of Sites of Importance for Nature Conservation. It is acknowledged that much of the Draft Route Alignment between towers 1 and 13 will cross woodland, Priority Habitat or Sites of Importance for Nature Conservation. This will be fully addressed at the next stage of the detailed design phase, whereby the final tower positions will be placed to avoid these as much as practicable. Where this is not practicable, compensatory habitat will be created.

[7] As presented at the first round of public consultation in early 2024

4.8 This part of the Draft Route Alignment has been selected to minimise landscape and visual effects resulting from the proximity of towers and overhead line to individual dwellings, which are scattered to the north and south. The alignment takes into account:

- the orientation of dwellings, to ensure main elevations face away from the closest tower;
- the distance of dwellings, to ensure they are not within the provisional Limit of Deviation; and
- the presence of surrounding vegetation, providing natural visual screening.

4.9 There are no residential properties within 100m of a tower or overhead line at this location.

Draft Route Alignment: towers 13 to 32

4.10 All of the Draft Route Alignment is within the Preferred Route Corridor presented at the first round of public consultation.

4.11 Angle towers have been used:

- to avoid mapped boundaries of Priority Habitat; and
- maintain an alignment within the Preferred Route Corridor.

4.12 There are no heavy angle towers within this part of the Draft Route Alignment.

4.13 The Draft Route Alignment avoids all areas of Ancient Woodland and National Forestry Inventory woodland, but crosses some areas of Priority Habitat, particularly to the north. It is acknowledged that much of the Draft Route Alignment in this area will cross Priority Habitat, and the detailed design will seek to minimise the adverse effects of this.

4.14 The Draft Route Alignment is routed across an area of lower ground to minimise landscape and visual impacts, and follows a relatively direct alignment. The route is constrained from routeing further to the west, due to a number of scattered dwellings and woodland, and to the east by an existing 33 kilovolt wood pole-mounted overhead line, which should be avoided in accordance with the Holford Rules.

4.15 Towers have been positioned to avoid narrow flood zone associated with Ffrwd Cynon (Ordinary Watercourse) and wider flood zone associated with Nant Gou (Ordinary Watercourse).

Draft Route Alignment: towers 33 to 44

4.16 A large part of the Draft Route Alignment deviates from the Preferred Route Corridor as a direct result of public feedback.

4.17 Angle towers have been used to:

- divert the alignment further to the east, maximising the distance from the settlements of Cwmann and Ram to the west in response to public feedback; and
- remain within the Preferred Route Corridor, whilst maintaining an appropriate distance from a single wind turbine and dwelling adjacent to the A485.

4.18 Oblique angle towers have been used instead of heavy angle towers, where feasible.

4.19 There are no towers positioned within mapped woodland or Priority Habitat, although a small parcel of mapped Priority Habitat is crossed overhead. Some Ancient Woodland is present, which forms part of a linear woodland along the banks of Nant Hathren (Ordinary Watercourse). The crossing of this woodland is unavoidable as routeing to either side would lead to consequential interactions with the settlement of Cwmann to the west, higher ground to the east and scattered individual dwellings.

4.20 This part of the Draft Route Alignment crosses slightly higher ground as a result of the deviation eastwards and continues to follow a rising landform around a hill. Tower positions have been selected to keep to the hill slopes and avoid routeing directly over the hill crest. Whilst routeing on higher ground is less favourable from a landscape perspective, the Draft Route Alignment better avoids the settlements of Cwmann and Ram and will be less visually intrusive to nearby receptors. Public feedback during the first round of public consultation events also indicated a preference to route further east to avoid Cwmann and Ram.

5 LAMPETER TO LLANLLWNI

Draft Route Alignment and reason for selection

5.1 There are 57 towers (towers 45 to 102) spanning a distance of approximately 12.5 kilometres between Lampeter and Llanllwni. An alignment within the Preferred Route Corridor has been possible, with some minor deviations. The greatest deviation is at Pencarreg between towers 46 and 59, where a more westerly alignment away from the Preferred Route Corridor has been defined, and at Llanllwni at tower 102, which diverts the alignment further towards the southwest, away from Llanllwni village.

5.2 The key reasons for the selection of the Draft Route Alignment are as follows:

- It crosses the least amount of woodland;
- It crosses the least amount of Priority Habitat;
- It is furthest from Caer Pencarreg Scheduled Monument;
- It maintains a reasonable distance from the settlements of Glan Duar and Llanybydder; and
- It avoids following the same alignment as an existing 132 kilovolt overhead line.

Draft Route Alignment: towers 45 to 59

5.3 The Draft Route Alignment is almost entirely outside of the Preferred Route Corridor in order to avoid an area that is relatively constrained by other existing overhead line infrastructure, particularly an existing wood pole-mounted 132 kilovolt overhead line, and to avoid routeing though the middle of a potential energy park comprising multiple wind turbines.

5.4 Angle towers have been used to:

- avoid properties at Parc-y-rhos;
- avoid spanning areas of woodland and tree groups;
- route through a natural gap between two large areas of Ancient Woodland;
- route outside the area of a potential energy park; and
- avoid residential properties.

5.5 Oblique angle towers have been used instead of heavy angle towers, where feasible.

5.6 Towers have been positioned outside of mapped areas of Priority Habitat, including woodland. Although the mapped boundaries of Priority Habitat may not be accurate, there is ample opportunity within the Draft Route Alignment to avoid important habitats during the detailed design phase. Where this is not possible, compensatory habitat will be created.

5.7 A key consideration is Caeau Blaenbydernyn Site of Special Scientific Interest. Tower 59 is necessarily close to the boundaries of this site in order to avoid scattered dwellings to the north. This area will undergo further scrutiny during ecological surveys to ensure the risk of impact is avoided or can be adequately mitigated.

5.8 This part of the Draft Route Alignment has been selected to minimise landscape and visual effects resulting from its proximity to dwellings, which are densely scattered closer to the Preferred Route Corridor. By deviating the Draft Route Alignment outside of the Preferred Route Corridor, a greater number of dwellings can be avoided. There are no residential properties within or close to the boundaries of the provisional Limit of Deviation.

5.9 In avoiding a greater number of dwellings, the Draft Route Alignment crosses over higher ground than within the Preferred Route Corridor at towers 53 and 54. This has the potential to make it more visible over longer distances. The visibility from Caer Pencarreg Scheduled Monument to the west was a key consideration, therefore. However, at over 2,000 metres away and with intervening woodland blocks adjacent to the towers at the same elevation, this is unlikely to result in a significant effect. This will be considered in more depth during the detailed design phase and in consultation with Cadw, the statutory consultee for the historic environment in Wales through the Environmental Impact Assessment process.

5.10 The Draft Route Alignment has been developed to reduce the risk of crossing into the proposed Nant Ceiment Energy Park, the boundaries of which are not yet known. As with the connection point to Lan Fawr Energy Park to the north of the Draft Route Alignment, the final alignment will be dependent on the location, orientation and layout of this potential energy park. It is therefore possible that additional towers will be required at this location.

Draft Route Alignment: towers 60 to 84

5.11 This part of the Draft Route Alignment is heavily constrained to the east and west, with Ancient Woodland, Scheduled Monuments, hilly terrain, scattered dwellings and the settlement of Llanybydder being key differentiating factors. As a result, the Draft Route Alignment broadly follows the Preferred Route Corridor, with only minor deviations.

5.12 Angle towers have been used to deviate from the Preferred Route Corridor:

- to maximise the distance from scattered dwellings and the settlements of Llanybydder, Rhydybont and Ty Mawr;
- to avoid following too closely the alignment of an existing wood pole-mounted 132 kilovolt overhead line;
- where woodland cannot be avoided, to divert the alignment across narrower parts to minimise tree loss; and
- in response to public feedback.

5.13 Oblique angle towers have been used instead of heavy angle towers, where feasible.

5.14 Towers have been positioned outside of mapped areas of woodland and Priority Habitat. Although the mapped boundaries of Priority Habitat may not be accurate, there is ample opportunity within the Draft Route Alignment to avoid important habitats during the detailed design phase. Where this is not possible, compensatory habitat will be created.

5.15 A key driver for selecting the Draft Route Alignment was the need to maintain a suitable clearance between the Project and the existing wood pole-mounted 132 kilovolt overhead line, which routes for approximately 4 kilometres within the Preferred Route Corridor.

However, the scope to achieve this is limited by the presence of large blocks of National Forest Inventory woodland and residential properties. Therefore, in order to maintain distance from settlements, keep to lower ground and avoid the existing overhead line, a small amount of tree felling will be necessary where woodland cannot be avoided.

5.16 The Draft Route Alignment has been designed to cross the aforementioned woodland at its narrowest point possible without oversailing nearby residential properties.

5.17 Proximity to the 'Three round cairns SE of Blaen Carreg' Scheduled Monument could not be avoided. Tower positions were therefore selected to ensure the Draft Route Alignment does not interrupt the line of sight between the cairns of this Scheduled Monument and another similar Scheduled Monument to the south.

Draft Route Alignment: tower 84 to 102

5.18 All of the Draft Route Alignment is within the Preferred Route Corridor presented at the first round of public consultation.

5.19 Angle towers are used:

- to keep within the Preferred Route Corridor; and
- to avoid higher ground areas where feasible.

5.20 Oblique angle towers have been used instead of heavy angle towers, where feasible.

5.21 The Draft Route Alignment avoids all areas of Priority Habitat, although one or two towers are relatively close to some Priority Habitat boundaries. There is ample opportunity for important habitat to be avoided, however, which will be considered during the detailed design phase. Where this is not possible, compensatory habitat will be created.

5.22 A small section of linear woodland, comprising Ancient Woodland and National Forest Inventory, cannot be avoided between towers 101 and 102 due to the presence of several residential properties either side of the Draft Route Alignment, and the proximity of the settlement of Llanllwni to the east.

5.23 The Draft Route Alignment is located on lower ground, following the valley between towers 88 and 99 to minimise landscape and visual impacts. There are some angle towers, positioned mainly to avoid rising onto the slopes of neighbouring hills.

5.24 There are no residential properties within or close to the provisional Limit of Deviation.

5.25 Tower 91 has been positioned to allow the route to cross the narrowest part possible of flood zone associated with Nant Ceiliog (Ordinary Watercourse), whilst keeping approximately equidistant between scattered dwellings. This tower is close to a known section of Roman road and tower 92 also sits close to a presumed Roman road. It is expected that both assets are below ground and therefore, setting impacts are not likely. The roads will be further considered during the detailed design phase to ensure the towers are not positioned directly over them.

5.26 Towers 92 to 101 are within the outer edges of an area of mapped Grade 3a agricultural land, which is classed as best and most versatile land. The Draft Route Alignment is constrained from routeing to the east away from Grade 3a land due to the A485 and clusters of dwellings located along the road. Continuation of Grade 3a land prevents

alternative routeing to the west. Further consideration will be given to tower positions following soils surveys, to inform the detailed design phase of tower positions in this area and to develop an appropriate Soil Management Plan for the construction phase of the Project.

6 LLANLLWNI TO ALLTWALIS

Draft Route Alignment and reason for selection

6.1 There are 44 towers (towers 103 to 146) spanning a distance of approximately 10 kilometres between Llanllwni and Alltwalis. The Draft Route Alignment has been routed within the Preferred Route Corridor between towers 110 and 126 only. The remainder of the route is outside of the Preferred Route Corridor.

6.2 The largest change is from tower 127 onwards, whereby the Preferred Route Corridor has switched to the alternative option considered as part of the initial route option appraisal presented in the Routeing and Consultation Document[1]. This alternative option was referred to as route option 3W during the first round of public consultation and the change was made in direct response to public consultation feedback, taking into account the following:

- It increases the distance from a greater number of residential properties at Alltwalis and other smaller settlements, whilst maintaining an acceptable distance from the settlement of Pencader;
- Although it crosses areas of high ground in places, it is likely to have less visibility across a wider area due to crossing lower elevations for a greater distance; and
- It interacts with less woodland.

6.3 As part of the initial design process, possible alignments within the amended Preferred Route Corridor have been appraised.

6.4 A less significant change is between towers 103 and 109, where the Draft Route Alignment deviates slightly westwards from the Preferred Route Corridor to increase the distance from the settlement of Llanllwni and to reduce the total number of residential properties in proximity to the Project.

Draft Route Alignment: towers 103 to 109

6.5 This part of the Draft Route Alignment is entirely outside of the amended Preferred Route Corridor, taking a southwest direction to provide as much distance as possible from the settlement of Llanllwni.

6.6 A heavy angle tower is used at tower 108 to:

- direct the alignment back towards the amended Preferred Route Corridor without crossing an area of Ancient Woodland; and
- maximise the distance from a single dwelling west of Gwarallt, whilst ensuring an area of peat is avoided to the west.

6.7 Oblique angle towers have been used instead of heavy angle towers, where feasible.

6.8 The Draft Route Alignment crosses Priority Habitat in three locations and National Forest Inventory woodland is crossed at one location, in favour of maximising the distance from the village of Llanwllni and nearby scattered dwellings. None of the towers are positioned within the boundaries of mapped woodland or Priority Habitat.

6.9 There are no residential properties within or close to the provisional Limit of Deviation.

Draft Route Alignment: towers 110 to 126

6.10 This part of the Draft Route Alignment remains within the amended Preferred Route Corridor.

6.11 Angle towers are used to route equidistantly between scattered isolated dwellings. Oblique angle towers have been used instead of heavy angle towers, where feasible.

6.12 The Draft Route Alignment does not cross any mapped areas of woodland or Priority Habitat.

6.13 There is a small number of scattered dwellings within 100 metres of the Draft Route Alignment, although none are within or close to the provisional Limit of Deviation. The alignment takes into account:

- the orientation of dwellings, to ensure main elevations face away from the closest tower;
- the distance of dwellings, to ensure they are not within the provisional Limit of Deviation; and
- the presence of surrounding vegetation, providing natural visual screening.

6.14 Following the detailed design phase, where there is potential for significant visual impacts to properties, a residential visual amenity assessment will be carried out to establish the level of impact and mitigation required.

Draft Route Alignment: towers 127 to 146

6.15 The Draft Route Alignment remains largely within the amended Preferred Route Corridor, with two minor deviations.

6.16 Angle towers have been used to:

- divert the alignment westwards into the amended Preferred Route Corridor;
- maximise the distance from Castell Du Castle Mound Scheduled Monument, southeast of Dolgran;
- avoid scattered dwellings south of Alltwalis, whilst maximising the distance from Alltwalis village; and
- route through a natural gap between mapped woodland areas.

6.17 Oblique angle towers have been used instead of heavy angle towers, where feasible.

6.18 The Draft Route Alignment does not cross any mapped areas of woodland or Priority Habitat.

6.19 There are 3 dwellings within 100m of the Draft Route Alignment, although none are within the provisional Limit of Deviation. The alignment takes into account:

- the orientation of dwellings, to ensure main elevations do not face onto the Draft Route Alignment;
- the distance of dwellings, to ensure they are not within the provisional Limit of Deviation; and

- the presence of surrounding vegetation, providing natural visual screening.

6.20 Following the detailed design phase, where there is potential for significant visual impacts to properties, a residential visual amenity assessment will be carried out to establish the level of impact and mitigation required.

6.21 Parts of the Draft Route Alignment cross areas of high ground, including a hill crest northwest of Alltwalis. This was considered necessary in order to avoid areas of Ancient Woodland, scattered dwellings and minimise potential visual impacts at Alltwalis. Whilst not preferred, there are large woodlands enclosing this part of the Draft Route Alignment to the north, east, south and west, which will serve to provide some natural screening of views and mitigation of landscape effects.

7 ALLTWALIS TO RHYDARGAEAU

Draft Route Alignment and reason for selection

7.1 There are 20 towers (towers 147 to 166) spanning a distance of approximately 4.2 kilometres between Alltwalis and Rhydargaeau. An alignment within the Preferred Route Corridor has been retained between towers 147 and 156, after which it deviates slightly outside of the Preferred Route Corridor eastwards.

7.2 The key reasons for the selection of the Draft Route Alignment are as follows:

- It is located further from clusters of dwellings concentrated around the A485;
- It avoids crossing multiple areas of flood zone associated with Nant Corwg; and
- It avoids a greater area of the Tywi Valley Historic Landscape Area.

Draft Route Alignment: towers 141 to 154

7.3 This part of the Draft Route Alignment is constrained to the east by an area of higher ground with relatively steep slopes, an extensive area of woodland (National Forest Inventory and Ancient Woodland) and isolated farms and dwellings. The alignment is also constrained to the west by clusters of dwellings concentrated along the A485. As a result, it is located entirely within the Preferred Route Corridor.

7.4 An angle tower has been used to:

- ensure equal separation between scattered dwellings either side of the Preferred Route Corridor; and
- follow the rising landform along the hillslopes, to avoid the highest ground as much as possible.

7.5 This part of the Draft Route Alignment does not cross any mapped areas of woodland or Priority Habitat.

7.6 There are no dwellings within or close to the provisional Limit of Deviation.

Draft Route Alignment: towers 155 to 166

7.7 This part of the Draft Route Alignment deviates slightly eastwards from the Preferred Route Corridor and continues towards the southeast. Although it routes along slightly higher ground, it is considered preferable due to the increased distance from settlements and properties, and from the Twyi Valley Historic Landscape Area to the west.

7.8 Angle towers have been used to:

- Maximise the distance from key receptors to the west; and
- Redirect the Draft Route Alignment into the Preferred Route Corridor.

7.9 Because the alignment seeks to avoid scattered dwellings and areas of Priority Habitat, a heavy angle tower was used to bring the Draft Route Alignment back into the Preferred Route Corridor northeast of Rhydargaeau.

7.10 There is slightly less interaction with woodland as a result of the minor deviation from the Preferred Route Corridor. Nevertheless, two linear woodlands cannot be avoided by the Draft Route Alignment. These comprise Ancient Woodland and National Forest Inventory. There is also slightly less interaction with Priority Habitat; there are no towers positioned within woodland or Priority Habitat, although it is possible important habitat extends beyond the mapped boundaries. This will be considered further during the detailed design phase, following field surveys.

7.11 There are no dwellings within or close to the provisional Limit of Deviation.

7.12 The Draft Route Alignment is in proximity to the Twyi Valley Historic Landscape Area but has been designed to follow an alignment outside of this designation. The potential for indirect impacts on this designation will be assessed, the results of which will inform the detailed design of the project in this area.

7.13 Towers have been positioned to avoid a relatively wide flood zone associated with Afon Gwili (Main River), whilst also avoiding areas of woodland along the river banks. This was considered the narrowest part of the flood zone, which crosses the width of the Preferred Route Corridor and beyond and cannot be avoided.

8 RHYDARGAEAU TO LLANDYFAELOG

Draft Route Alignment and reason for selection

8.1 The Draft Route Alignment introduces a wider range of electricity infrastructure, specifically a combination of overhead line, underground cable, cable sealing end compounds and a switching station.

8.2 It comprises 46 towers (towers 167 to 212) spanning a distance of approximately 10 kilometres between Rhydargaeau and Llandyfaelog. In addition, underground cables are proposed in place of overhead lines at two locations, comprising approximately 2.7 kilometres at White Mill, and approximately 2.3 kilometres at Llandyfaelog. It is proposed that at the start and end of each section of underground cable, the transition from OHL to UGC will be via a cable sealing end compound . The latter section of underground cable will connect into the Llandyfaelog Substation. The end the Draft Route Alignment is indicative only and the final detailed route alignment will be dependent on the orientation and layout of the Llandyfaelog switching station.

8.3 Much of the Draft Route Alignment is within the Preferred Route Corridor, with minor deviations. However, there is one notable deviation from the Preferred Route Corridor between White Mill and Abergwili.

8.4 The key reasons for the selection of the Draft Route Alignment are as follows:

- To provide underground cable around Bryn Myrddin (Merlin's Hill) Scheduled Monument, to avoid significant setting impacts; the distance from Bryn Myrddin and location of the proposed underground cable has been selected to minimise the risk of encountering buried archaeology associated with the Scheduled Monument;
- To avoid routeing an underground cable through Ancient Woodland (resulting in significant tree felling and habitat loss);
- To ensure cable sealing end compounds are in proximity to fewer residential properties and heritage features; and
- To provide underground cable on the approach to the proposed Llandyfaelog Substation, to minimise potential for cumulative visual impacts as a result of other existing and proposed infrastructure in this location.

Draft Route Alignment: towers 167 to 179

8.5 All of the Draft Route Alignment is positioned within the Preferred Route Corridor.

8.6 Angle towers are used to:

- keep the alignment within the Preferred Route Corridor;
- maintain an approximately equidistant alignment between dwellings either side of the Preferred Route Corridor;
- where woodland cannot be avoided, to divert the alignment across narrower parts to minimise tree loss; and
- avoid oversailing a farmstead at Llwyn-Martin-Isaf to the west of tower 174.

8.7 Oblique angle towers have been used instead of heavy angle towers, where feasible

8.8 The Draft Route Alignment crosses one linear stretch of mapped National Forest Inventory woodland, associated with the Nant Crychiau (Ordinary Watercourse) and which cannot be avoided. The alignment has been selected to cross the woodland at its narrowest point to minimise potential impacts on woodland habitat.

8.9 Towers have been positioned outside of mapped areas of Priority Habitat, including woodland. It is recognised that important habitats, including woodland habitat, may be crossed where the Draft Route Alignment passes close to mapped boundaries of Priority Habitat. This is particularly the case for fields between towers 173 and 175, which may comprise woodland, streams and marshland, and this will be further assessed during the detailed design phase. Positioned the Draft Route Alignment further west or east to avoid these areas will result in increased landscape and visual effects due to its proximity to clusters of dwellings and higher ground.

8.10 There are no residential properties within or close to the provisional Limit of Deviation.

Draft Route Alignment: towers 180 to 191

8.11 There are several constraints in this part of the Draft Route Alignment, necessitating a significant deviation to the west from the Preferred Route Corridor. It includes a cable sealing end compound at tower 191, which marks the beginning of a section of underground cable (see below). The main driver for deviating westwards from the Preferred Route Corridor is the presence of Bryn Myrddin (Merlin's Hill) Scheduled Monument and the settlement of White Mill.

8.12 Angle towers are used to:

- Maximise the distance from Bryn Myrddin (Merlin's Hill) Scheduled Monument;
- Avoid areas of National Forest Inventory and Ancient Woodland where possible, and utilise natural gaps between trees;
- Where woodland cannot be avoided, to divert the alignment across narrower parts to minimise tree loss;
- Minimise the number of watercourses crossed; and
- Maintain a reasonable distance from the settlement of Abergwili.

8.13 Oblique angle towers have been preferred, however, a heavy angle at tower 186 was necessary to avoid routeing closer to the settlement of Abergwili, whilst maintaining separation from Bryn Myrddin (Merlin's Hill) Scheduled Monument.

8.14 There are no towers within mapped areas of woodland and Priority Habitat and the Draft Route Alignment has been routed through natural gaps between woodlands where possible. A linear woodland, comprising National Forest Inventory and Ancient Woodland, follows the course of Nant Penycnwc (Ordinary Watercourse). This area of woodland cannot be avoided, with towers 185 and 186 spanning the river and National Forest Inventory woodland. This is considered necessary to take the alignment of the Draft Route Alignment away from Bryn Myrddin (Merlin's Hill) Scheduled Monument.

8.15 After crossing the Nant Penycnwc, the Draft Route Alignment continues southwards, maintaining an appropriate distance from scattered dwellings to the east and west. There are no dwellings within or close to the provisional Limit of Deviation.

8.16 Installation of a cable sealing end compound in order to continue the Draft Route Alignment underground is proposed at tower 191. This location has been selected as it:

- offers the required area of level ground, in an area of relatively difficult terrain;
- benefits from existing natural screening in the form of woodland to the west, although other woodland to the south will potentially need to be removed to allow underground cable installation; and
- minimises setting impacts to Bryn Myrddin (Merlin's Hill) Scheduled Monument.

8.17 As a result, the proposed cable sealing end compound is in proximity to a residential property, which forms part of a farm compound with associated farm sheds. The outer buildings of the property are within 100 metres to the east. The dwelling appears to be orientated away from the cable sealing end and benefits from intervening agricultural sheds, which provides some visual screening.

8.18 Following the detailed design phase, where there is potential for significant visual impacts to properties, a more detailed residential visual amenity assessment will be carried out at this location to establish the level of impact and mitigation required.

Draft Route Alignment: underground cable to 192

8.19 This part of the Draft Route Alignment comprises entirely underground cable between towers 191 and 192. Undergrounding at this location is proposed to avoid impacting the setting of Bryn Myrddin (Merlin's Hill) Scheduled Monument located to the east.

8.20 The area around the Draft Route Alignment is highly constrained by multiple receptors. Constraints include:

- West: existing underground cable, settlement of Abergwili and Bishop's Palace Registered Park and Garden;
- East: difficult terrain and geology, the settlement of White Mill and Bryn Myrddin (Merlin's Hill) Scheduled Monument; and
- South: scattered dwellings, unavoidable linear Ancient Woodland, the A40, the Afon Tywi Special Area of Conservation, extensive areas of flood zone, Bishops Pond Site of Special Scientific Interest, and multiple areas of Priority Habitat.

8.21 Whilst an underground cable may be beneficial in terms of reducing visual and historic setting impacts, it is more detrimental to receptors such as soil, water, buried archaeology, habitats and protected species due to the clearance and excavation of a large swathe of land. It also introduces above ground infrastructure such as cable sealing end compounds, and removes natural features that form part of the landscape, which can have a negative impact on landscape and visual amenity. To mitigate the significance of impacts, different methods of installation will be recommended as part of the Environmental Impact Assessment. These will be incorporated into the construction design wherever possible by on site contractors.

8.22 The underground cable crosses an area of approximately 2.7 kilometres in a southerly direction, to cross the A40 and Afon Twyi. It is likely that a trenchless installation method will be used to cross beneath the A40, reverting back to open trench methods on the south side of the road. Areas of National Forest Inventory and Ancient Woodland north and south of the A40 cannot be avoided. The Draft Route Alignment is constrained from

utilising passages between the blocks of mapped woodland by isolated properties and therefore, it necessarily crosses a narrow width of Ancient Woodland bordering the A40 and an area of mapped Priority Habitat to the south of the A40.

8.23 It is acknowledged that, due to the proximity to Bryn Myrddin (Merlin's Hill) Scheduled Monument (a hillfort) and nearby and round barrow Scheduled Monuments, it is possible for unknown buried archaeological features to be encountered during excavations. This will be assessed in more detail during archaeological site surveys and where buried assets are identified, the detailed design phase will aim to avoid or minimise disturbance to them.

8.24 The Draft Route Alignment continues south across the Afon Twyi (Main River). It remains within the Afon Tywi flood zone for approximately 1.4 kilometres, passing in proximity to a Scheduled Monument and crossing under the Afon Tywi river bed and B4300 Capel Dewi Road. The river and road crossings will utilise appropriate installation methods to avoid directly impacting the Afon Tywi, which is a designated Special Area of Conservation and Site of Special Scientific Interest, and to avoid the requirement for extended road closures and traffic management measures if possible.

8.25 The Draft Route Alignment continues through an area of mapped Priority Habitat, utilising bends to avoid as much of this receptor as possible, however, some smaller parcels of Priority Habitat cannot be avoided due to larger expanses of Priority Habitat and Ancient Woodland to the east and west respectively.

8.26 The Draft Route Alignment surfaces at tower 192 via a cable sealing end compound. This location was selected as it:

- offers the required area of level ground, with the smallest gradient;
- is within the Preferred Route Corridor; and
- is sufficiently distant from Bryn Myrddin (Merlin's Hill) Scheduled Monument.

Draft Route Alignment: towers 193 to 212

8.27 This part of the Draft Route Alignment remains largely within the Preferred Route Corridor, with some minor deviations.

8.28 Angle towers have been used:

- to divert the alignment through existing gaps in woodland and Priority Habitat along most of the alignment;
- where woodland cannot be avoided, to divert the alignment across the narrower parts to minimise tree loss;
- to create a more direct alignment that reduces the need for a heavy angle tower at Cwmffrwd; and
- to divert the alignment towards the optimal location for a cable sealing end compound, whilst avoiding scattered residential properties.

8.29 Oblique angle towers have been used instead of heavy angle towers, where feasible.

8.30 Towers have been positioned outside of mapped areas of Priority Habitat, although it is expected that this area includes extensive Sites of Importance for Nature Conservation not currently mapped. It is acknowledged that relatively significant interaction with an

area of National Forest Inventory woodland will be necessary between towers 199 and 201, with one tower positioned within the woodland itself. This is necessary due to multiple other constraint interactions that restrict an alternative alignment outside of the woodland, particularly the following:

- Priority Habitat east and west of the woodland, which cannot be avoided;
- Multiple peat deposits north and east of the woodland;
- An existing 132 kilovolt overhead line adjacent to the woodland to the east, following a parallel alignment; and
- Multiple scattered dwellings east and west of the woodland.

8.31 Impacts due to loss of trees and woodland habitat will be fully addressed during the detailed design phase, whereby the final tower positions will be placed as sensitively as possible. Compensatory habitat will be created.

8.32 The Draft Route Alignment deviates slightly from the Preferred Route Corridor from tower 202 to take it further from the settlement of Cwmffrwd to the west, thereby removing the need for a heavy angle tower at this location and creating a more direct route. In doing so, the Draft Route Alignment crosses a slightly larger stretch of a linear National Forest Inventory woodland, associated with Nant Cwmffrwd (Ordinary Watercourse). Towers have been positioned outside of this woodland and adjacent mapped Priority Habitat.

8.33 The Draft Route Alignment crosses Nant Pibwr (Main River), with towers strategically positioned outside of the associated flood zone whilst also maximising the distance from two dwellings to the east. It continues in a southwesterly direction to achieve a near perpendicular crossing of the A48. The alignment here was selected to ensure an appropriate clearance above the highway and to maintain an appropriate distance from an existing high pressure gas pipeline, whilst also optimising the span length between towers.

8.34 There are no dwellings within or close to the provisional Limit of Deviation.

8.35 Installation of a cable sealing end compound in order to continue the Draft Route Alignment underground is proposed at tower 212. This location has been selected as it:

- provides the required area of level ground;
- has suitable access available; and
- maintains a reasonable distance from dwellings to the north, east, south and west, including the hamlet of Idole.

8.36 It is acknowledged that this location is in proximity to a small surface water body and a small area at risk of surface water flooding. This will be considered in more detail during the detailed design phase, when the exact footprint and location of the cable sealing end compound will be confirmed.

Draft Route Alignment: underground cable to Llandyfaelog Substation

8.37 It is proposed to install an underground cable from tower 212, which will continue to the indicative connection point at Llandyfaelog Substation. The underground cable crosses an area of approximately 2.3 kilometres, routeing south west for approximately 1

kilometre within the Preferred Route Corridor before deviating south east at an angle outside of the Preferred Route Corridor until it reaches Llandyfaelog Substation.

8.38 An underground cable is proposed in this location in response to public feedback during the first round of public consultation. The alignment was selected to:

- avoid mapped areas of woodland and Priority Habitat;
- maintain an appropriate distance from residential properties;
- ensure the Draft Route Alignment, in combination with other utilities and electrical infrastructure, do not lead to unacceptable cumulative impacts on nearby dwellings; and
- align with the indicative switching station at Llandyfaelog Substation.

8.39 This part of the Draft Route Alignment is relatively constrained by existing and proposed infrastructure, together with multiple properties, woodland and important habitats.

8.40 There may be a cumulation of impacts to neighbouring residents due to construction noise and traffic associated with this Project and other energy infrastructure projects in the area. Although temporary, these will be considered as part of the Environmental Impact Assessment process.

9 CONSULTATION PROCESS AND NEXT STEPS

Introduction

9.1 Green GEN Cymru's consultation is seeking feedback from stakeholders and communities so that this can be considered in the decisions we make on the Project.

9.2 This chapter provides an overview of the consultation we will undertake for the Project. It covers:

- Why we are consulting;
- The consultation process – the planning context and our approach to consultation;
- Our plans for consultation – an overview of the pre-application consultation and where, who, how and when we are consulting in Stage 2;
- Why feedback is important and how it influences the development of our proposals; and
- How to provide feedback.

9.3 The consultation is open from 5th March to 16th April 2025.

Why consult?

9.4 Green GEN Cymru is working to develop a stronger, more resilient renewable electricity network for Wales – distributing clean, green energy to our homes, hospitals, schools, businesses, and communities. This will help to address the climate emergency whilst supporting the Welsh Government's target to meet the equivalent of 100% of Welsh electricity needs from renewable sources by 2035.

9.5 Green GEN Cymru's proposed network looks to unlock Wales's energy potential and support, accelerate and enable Wales's net zero transition. New grid infrastructure in Wales 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.

9.6 It is important to us that communities and stakeholders have the opportunity to comment on our Project at an early stage, so we can make decisions in view of the feedback received and identify ways to reduce or avoid impacts and create opportunities.

9.7 We are committed to ensuring our community consultation is accessible, understandable and meaningful. These guiding principles have shaped the information set out in this chapter and the materials we will provide for consultation.

The consultation process

9.8 The Planning Act (Wales) 2015 requires applicants to consult local communities and stakeholders on their proposals.

9.9 The Development of National Significance application process is managed by Planning and Environment Decisions Wales (PEDW), which has set out its expectations for public consultation and engagement on infrastructure projects in its document Pre-Application Community Consultation: Best Practice Guidance for Developers (December 2021), in which Section 3.1 states: “The challenge is for a developer to consult widely and clearly to capture a balanced and informed response. When executed well, engagement should increase the level of transparency, develop relationships, and shape the project by considering and responding to feedback.”

9.10 As a company proudly based in Wales, and investing in Wales, Green GEN Cymru attaches great importance to the effect that its work may have on the environment and local communities in Wales.

9.11 Green GEN Cymru is committed to providing clear and up-to-date information on its proposals and consulting local people at each stage where their views can help to shape our proposals before a consent application is submitted.

9.12 Green GEN Cymru recognises that developing the Project is a complex and our consultation strategy goes beyond the PEDW good practice guidance to ensure that local people have the opportunity to comment. Three pre-application consultation exercises have been or will be carried out, as follows:

1. Public consultation on the preferred route corridor for the Project, 24 January – 6 March 2024;
2. Public consultation on a draft route alignment for the Project, including proposed pylon locations, access routes and working areas, 5 March to 16 April 2025; and
3. Public consultation on our proposed Development of National Significance application, likely in Spring 2026.

9.13 Following each round of consultation, we will prepare a Consultation Report summarising how we consulted the community and how the responses influenced the development of the Project.

9.14 Following submission of the consent application, PEDW will carry out further statutory consultation with the public and stakeholders before making any decision on the proposal.

Our plans for Stage 2 consultation – Spring 2025

9.15 We are inviting comments on our Project, prior to making an application for consent.

9.16 We will take a digital first approach, consistent with current best practice. Our Project website (www.greengentowyteifi.com) will be the primary means of accessing information about the Project and the preferred method for providing feedback. Digital platforms will be suitable for both desktop and mobile devices. The digital approach will be accompanied by physical engagement methods including mailings to addresses near to the Project, community events, and hard copies of consultation materials being available (at events or on request).

Where we will consult

9.17 We have defined a consultation zone in the vicinity of the Project based on the potential impacts of our work (such as visual effects and/or effects from construction). This area comprises a minimum of 1km from either side of the original preferred route corridor presented as part of our first consultation in 2024. The consultation zone has been updated to account for areas where the draft route alignment deviates from the original preferred route corridor.

9.18 Most of our community consultation activities will be focused on this zone, including information publicising the consultation being issued to households, and community events. Where suitable venues are not available in the consultation zone, we have booked events in the nearest population centres.

9.19 We will also undertake activities to promote broad awareness of the consultation outside of the consultation zone, such as advertising in the local area and notifying relevant stakeholders across the wider region.

9.20 The consultation will be open to anyone who wishes to provide feedback on the Project.

Who we will consult

Those living and working in the consultation zone

9.21 We will primarily seek to engage with the communities and stakeholder groups within the consultation zone. This will include residents, businesses, and their elected representatives.

Seldom heard groups

9.22 We recognise that there are individuals and groups that may have difficulties taking part in the consultation process, such as young and elderly people; people with a physical disability or learning difficulty; or whose first language is not Welsh or English. Requests for consultation materials to meet specific requirements (such as Braille or foreign languages, or for those with literacy difficulties) will be considered on a case-by-case basis so we can establish how best to provide information.

People with an interest in land

9.23 We will engage fully with all relevant organisations and individuals (such as landowners) who have an interest in the land affected by our Project at this stage. While it is important that we capture their feedback during the consultation, we are also encouraging an ongoing dialogue beyond this period as the project design evolves.

Local stakeholder organisations

9.24 We have identified a range of local stakeholder organisations with relevant knowledge and interests relating to aspects of our Project - such as the environment, landscape, wildlife, heritage, tourism and agriculture. We are inviting these organisations to comment on our proposals.

9.25 Local stakeholder organisations include local business groups, schools, universities, sports clubs, as well as farmers, tourism, wildlife, youth and community groups.

Prescribed and non-statutory stakeholders

9.26 The Planning (Wales) Act 2015 requires that we consult with a range of organisations, nationally and locally, whose operations and knowledge is consistent with providing feedback on our Project.

9.27 Prescribed stakeholders include County and Community Councils, NRW, Cadw, local highways, Health and Safety Executive and Welsh Ministers.

What we are consulting on

9.28 We are consulting on the draft route alignment to provide a connection between the Lan Fawr Energy Park located east of Llanddewi Brefi, Ceredigion to the new National Grid substation at Llandyfaelog. This will be achieved through a 132-kilovolt connection, comprised of overhead and underground infrastructure. As well as connecting the Lan Fawr Energy Park into the wider electricity network, the Project will also provide the necessary infrastructure to connect other, future renewable energy generation schemes to this network.

9.29 We are also asking for feedback on:

- Any factors you think we should consider when finalising our proposals for the draft route alignment.
- Any factors you feel have not been considered in our work to date that will help us identify any potential issues as we finalise our detailed plans before we prepare our consent applications.
- The experience of consultation and the information we have made available.

9.30 Feedback from this second consultation will inform the final design for the Project, which we will consult on prior to submitting an application to PEDW.

Public exhibitions

9.31 We will hold community events to give people the opportunity to talk to our team and ask questions. Large scale maps, photos and other materials will be available to view at physical events. Welsh and English-speaking staff will be at all events.

Table 9-1 Consultation events timetable

Location, date and time:		
Aberduar Baptist Chapel, Glanduar, Llanybydder, SA40 9RS	20.03.2025	2pm - 7pm
Llanpumsaint Memorial Hall, Llanpumsaint, Carmarthen, SA33 6BZ	21.03.2025	11am – 4pm
Peniel Community School, Peniel, Carmarthen SA32 7AB	22.03.2025	10am – 3pm

Location, date and time:		
Lampeter Wellbeing Centre, Peterwell Terrace, Lampeter SA48 7BX	27.03.2025	2pm – 6pm
Llandyfaelog Community Hall, Llandyfaelog, Kidwelly SA17 5PA	28.03.2025	2pm – 7pm
Pencader Pavillion, Pencader, Carmarthen SA39 9ER	29.03.2025	10am – 3pm

Consultation materials

9.32 We are producing materials for this consultation, as set out in the table below. These are intended for the public and provide information on our Project to support providing feedback.

Table 9-2 Consultation materials

Consultation material	Overview
Project website	The project website has details of the Project. It holds all consultation materials. A digital feedback form is available alongside interactive maps and visualisations.
Consultation postcard	A consultation postcard with a brief explanation of the Project and clear signposts of how to find out more, including website, contact details for the project team and details of consultation events. The postcard is being sent to all addresses in the consultation zone (approximately 8,300).
Consultation brochure	An overview of the Project includes maps of the draft route alignment and substation site. It is available to download from the website, or in hard copy on request from the project team.
FAQ	FAQ document responding to key themes and concerns from the 2024 consultation and anticipated queries for the 2025 consultation.
Consultation feedback form	Hard copy and digital versions of feedback form for consultees to provide comments.

9.33 Consultation materials listed above will be available in print at our events and on request.

9.34 We are happy to respond to reasonable requests from consultees for copies of documents. Copies of the documents, plans and maps will be available free of charge in digital format. Requests for hard copies will be reviewed on a case-by-case basis. A reasonable copying charge may apply (up to a maximum of £500 for one full suite of documents) to be paid for by the recipient.

3D Visualisation

9.35 This will be available at all events and via the project website. 3D visualisations allows consultees to view the draft route alignment from various locations, supporting understanding of visual impacts in the area.

Enquiries and information

9.36 We are operating a freephone enquiry line (0800 915 2496) in Welsh and English (9am-5pm Mon-Fri) with an answer phone service in operation outside of these hours. Email and freepost will also be available.

Responding to the consultation

- There will be several ways to provide feedback:
- Online feedback form on our website: www.greengentowyteifi.com;
- Hard copy feedback form available on request or at community events
- Sending an email to: info@greengentowyteifi.com; and
- Sending written feedback to us: FREEPOST Green GEN Cymru TT.

9.37 Feedback will need to be received by 23:59 on Wednesday 16 April 2025. Any feedback received after this day may not be considered by our team.

Next steps

9.38 As set out in the Green GEN Cymru Approach to Routeing chapter of this document (Chapter 2), following consultation with stakeholders including landowners and the community, and following a review of consultation responses, the draft route alignment will be refined further to take account of feedback.

9.39 We will review feedback alongside our obligations to consider:

- Environmental and socio-economic assessments;
- Our duties to develop a safe, efficient and affordable connection; and
- Planning policy and related guidance.

9.40 We will present the outcome of this analysis in a Stage 2 Consultation Report (2025), which will provide an account of the comments we have received, set out the issues raised and explain how we have considered them in refining the project design for the draft route alignment. Where we have not altered our proposals to reflect issues raised, we will explain our reasoning.

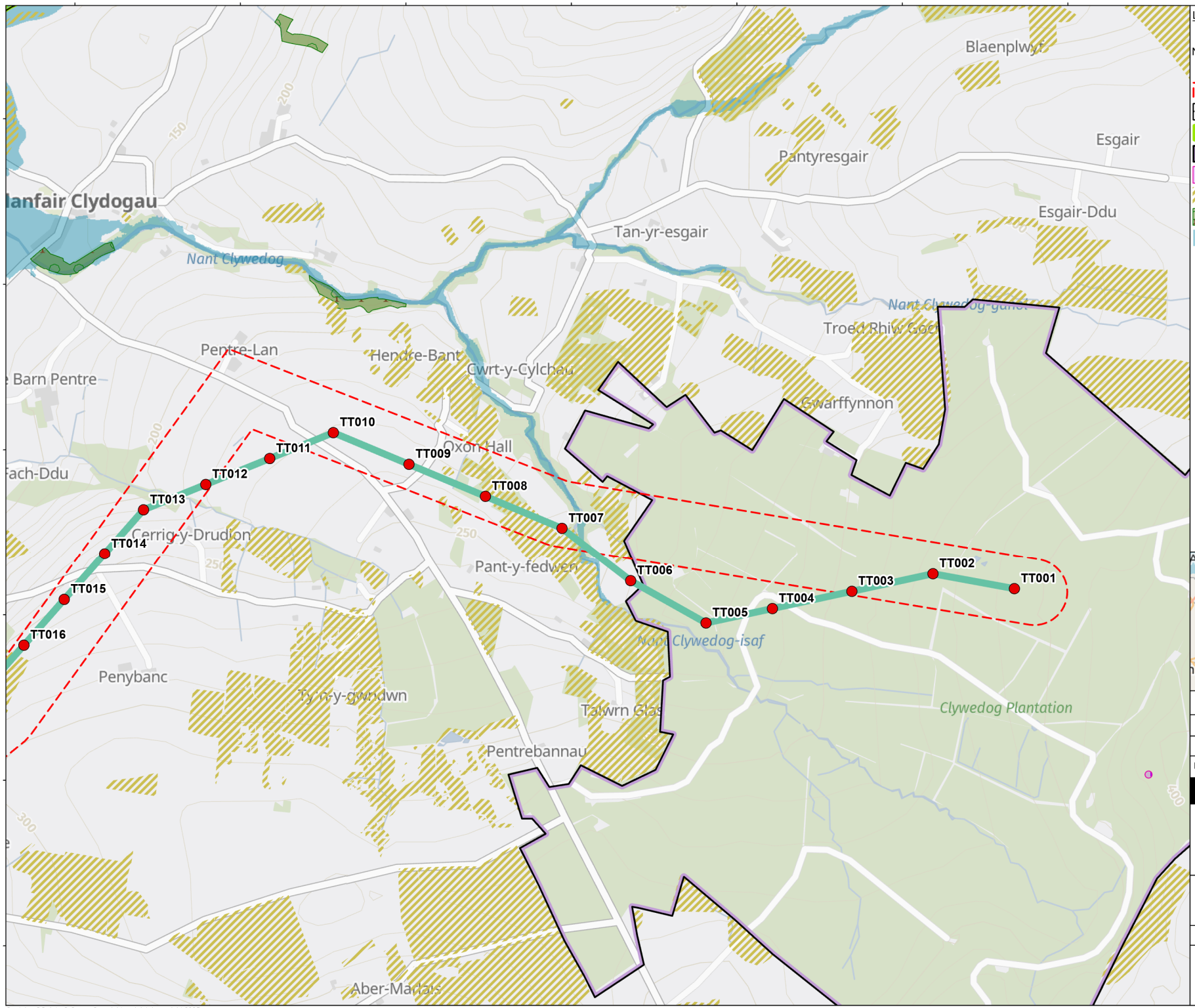
9.41 We anticipate publishing the Consultation Feedback Report to coincide with the launch of the Statutory Consultation, which will present a final proposed design for the route, including pylon locations and any areas of undergrounding. This statutory stage of consultation will allow us to gather and consider final comments that may help finalise the design before we submit our application.

9.42 Between this second consultation and the Statutory Consultation, we will keep people up-to-date with relevant news on the project. This will include stakeholder briefings, web updates and community updates for those that sign up to be kept informed via the project website, with community newsletters and web updates.

9.43 Our consultation may be supplemented by additional consultations should the proposals benefit from further community and stakeholder input. Should this be required, we will advertise the supplementary consultations and consultees will be notified.

9.44 During and after this stage of consultation, we will look to engage and establish an ongoing dialogue with all landowners potentially affected by the Project.

APPENDIX A – DRAFT ROUTE ALIGNMENT FIGURES



Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

RSK

TITLE: Figure 1
Draft Route Alignment – Key Constraints

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REV 00

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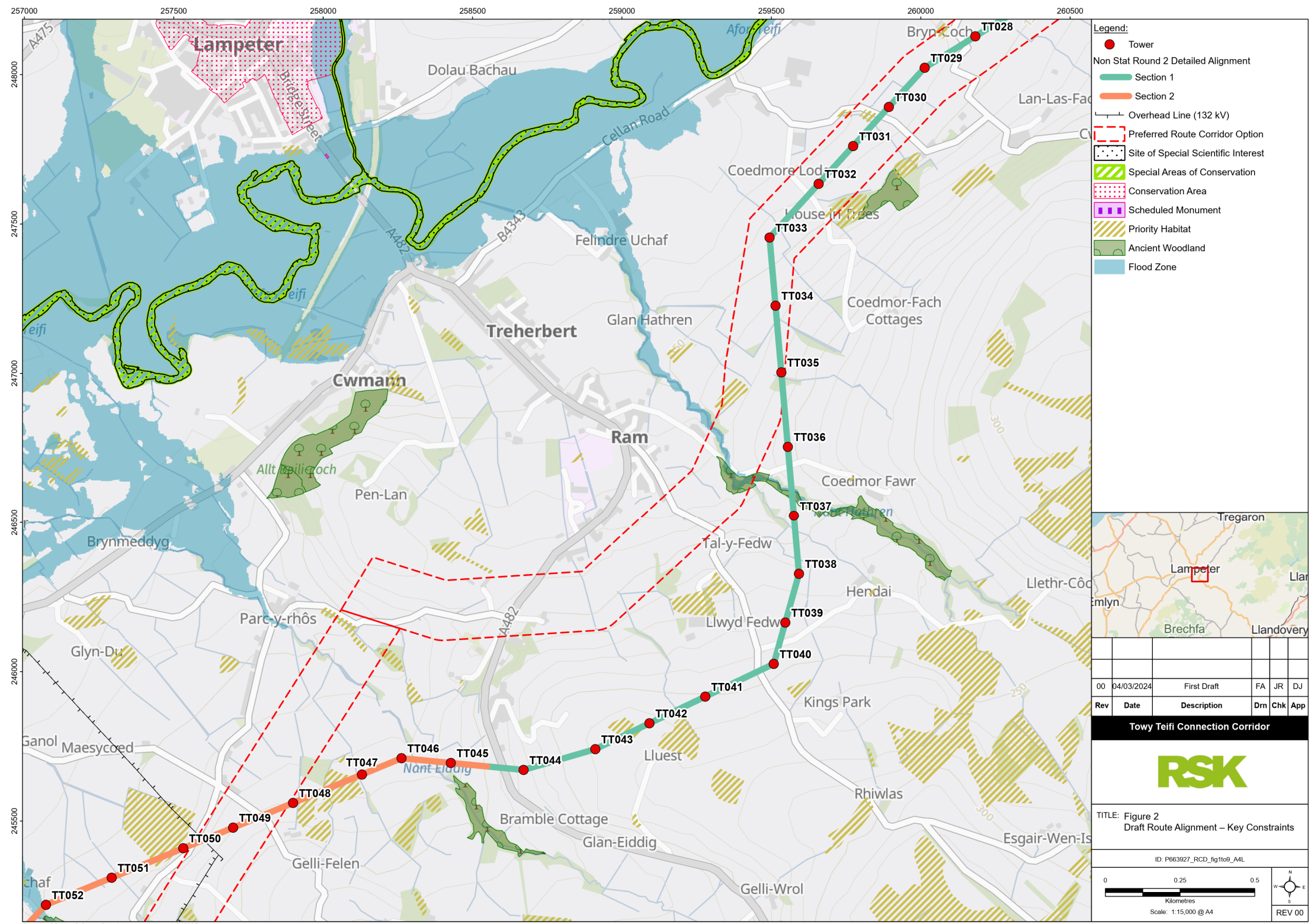

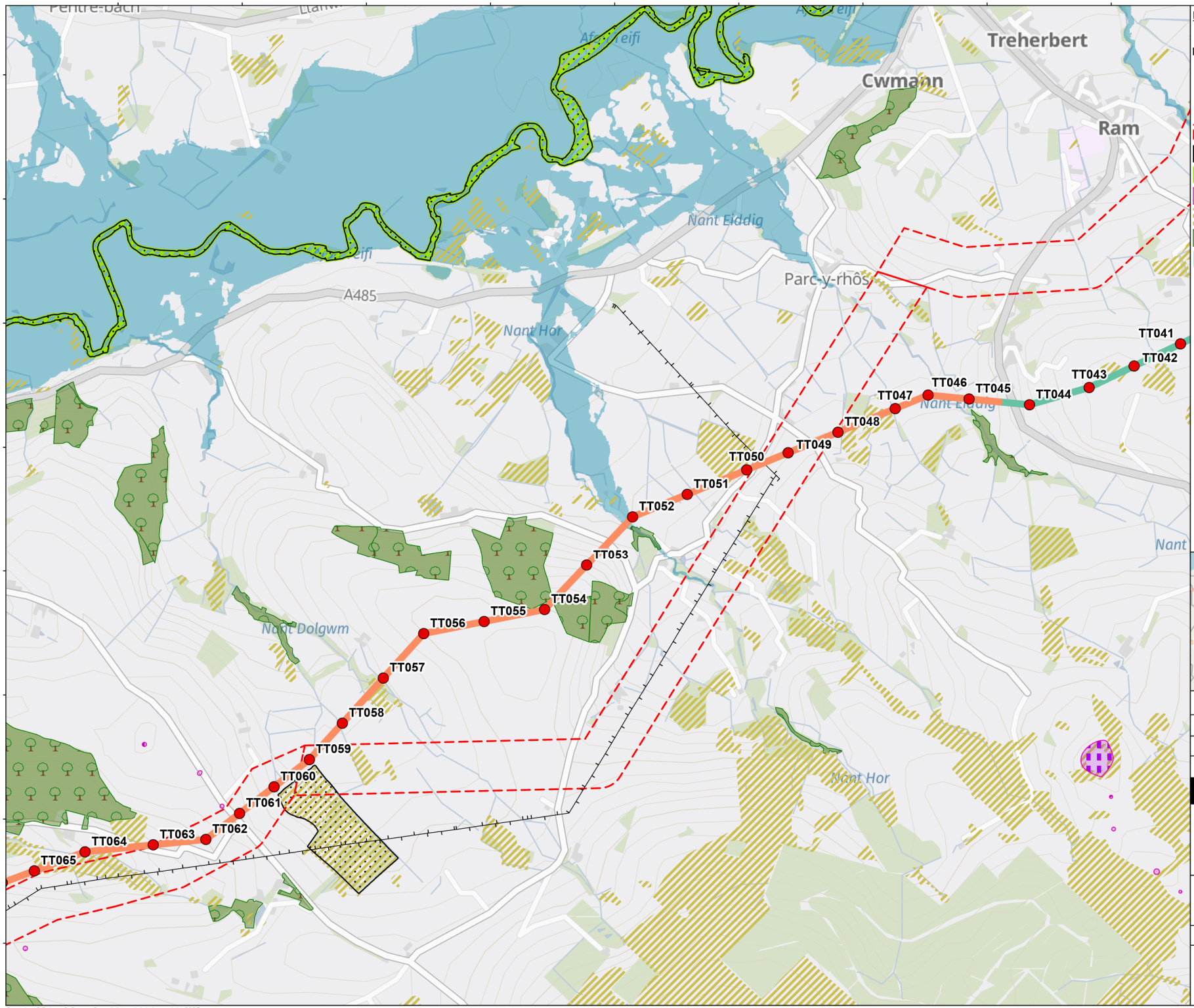

Legend:

- Tower
- Non Stat Round 2 Detailed Alignment
- Section 1
- Section 2
- Overhead Line (132 kV)
- Preferred Route Corridor Option
- Site of Special Scientific Interest
- Special Areas of Conservation
- Scheduled Monument
- Priority Habitat
- Ancient Woodland
- Flood Zone

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

RSK

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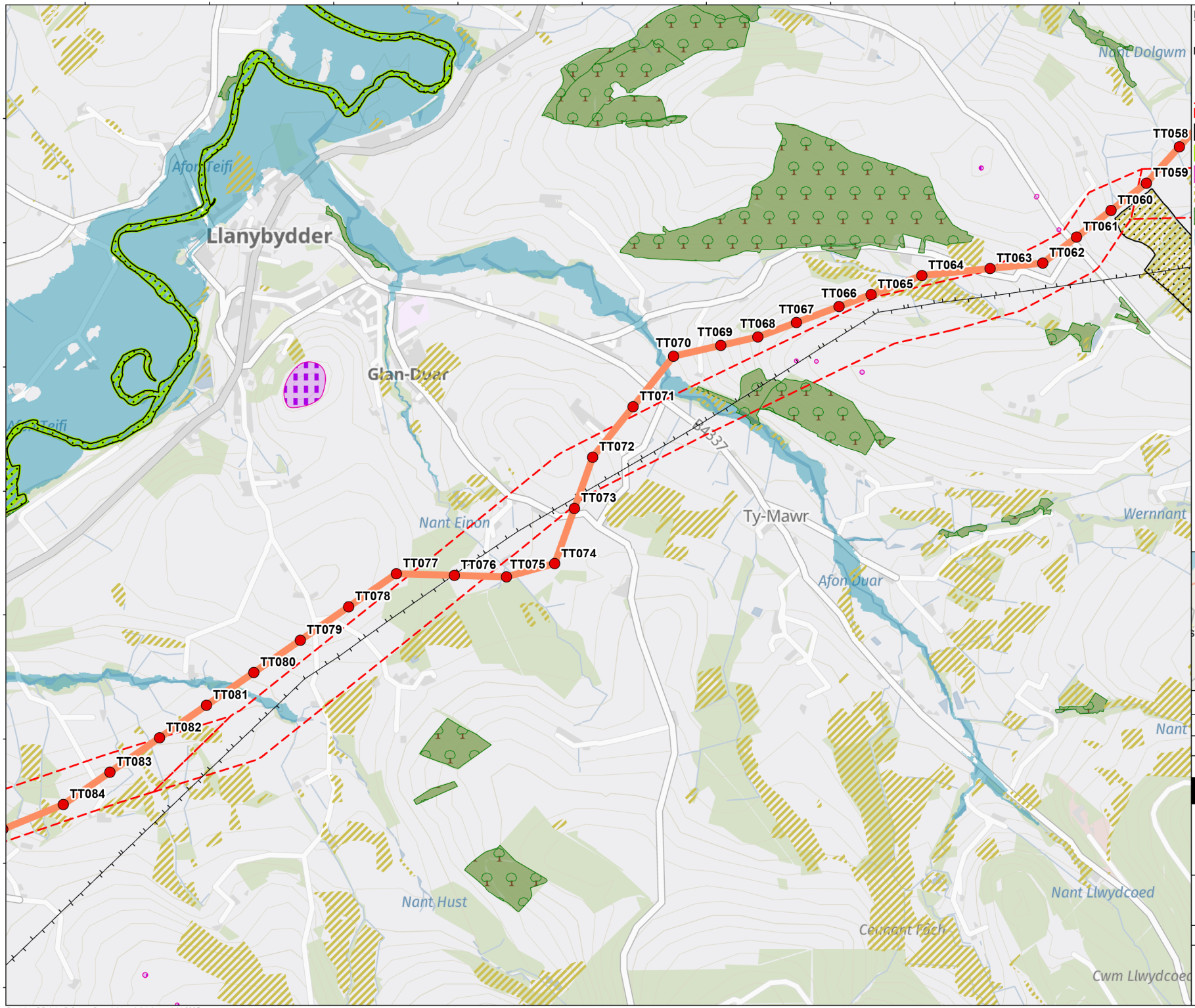

Legend:

- Tower
- Non Stat Round 2 Detailed Alignment
- Section 2
- Overhead Line (132 kV)
- Preferred Route Corridor Option
- Site of Special Scientific Interest
- Special Areas of Conservation
- Scheduled Monument
- Priority Habitat
- Ancient Woodland
- Flood Zone

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

RSK

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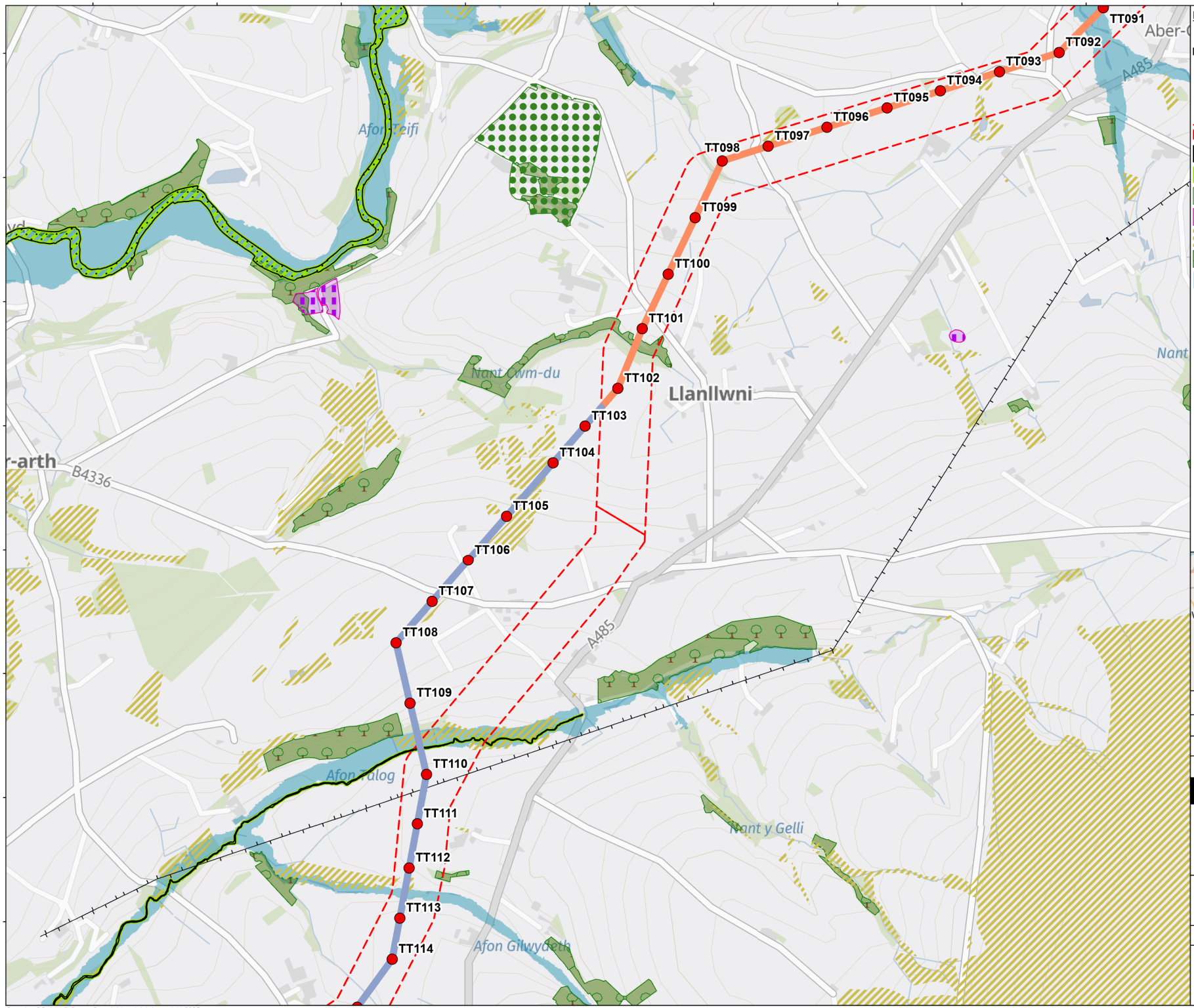

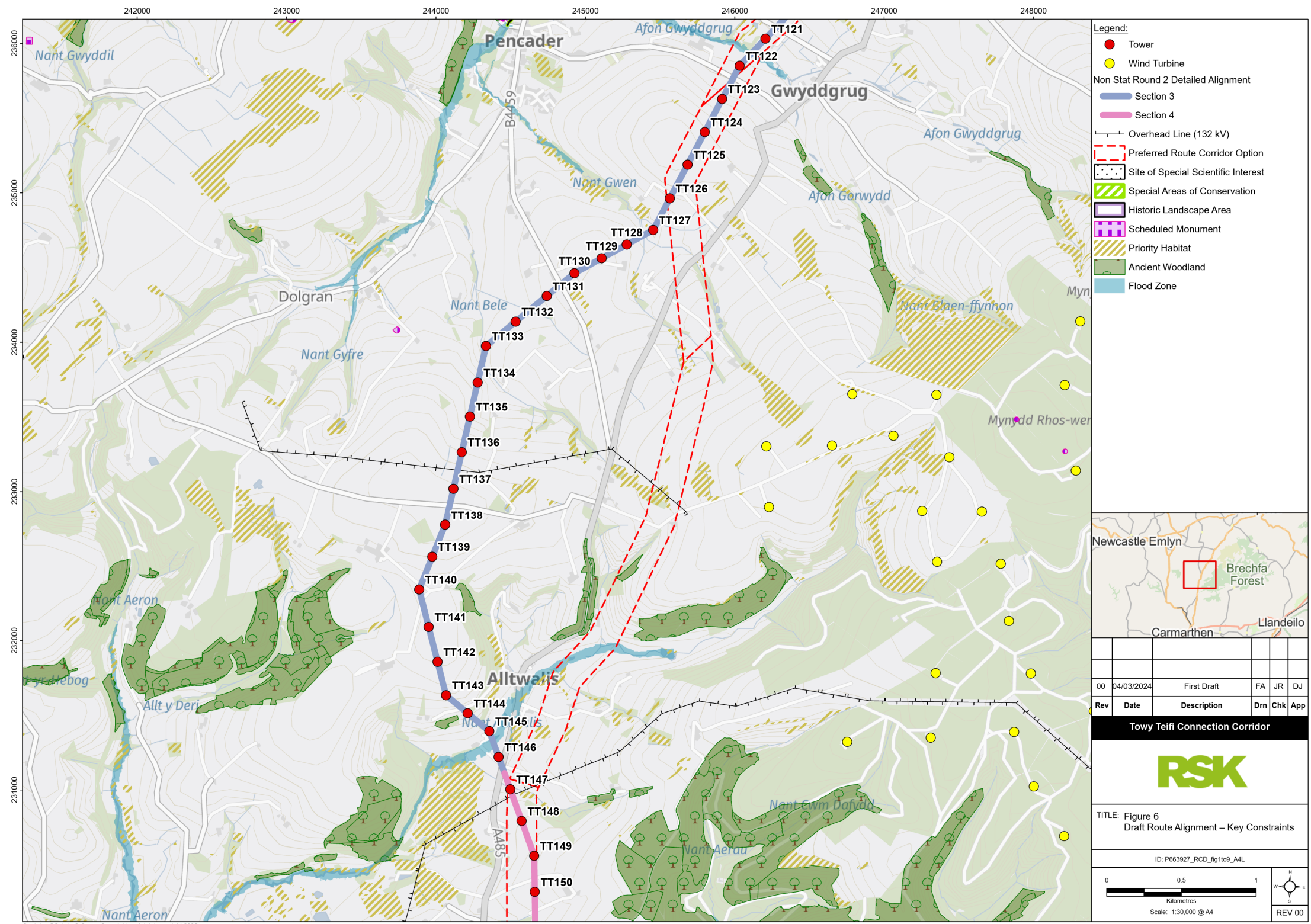

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

RSK

TITLE: Figure 6
Draft Route Alignment – Key Constraints

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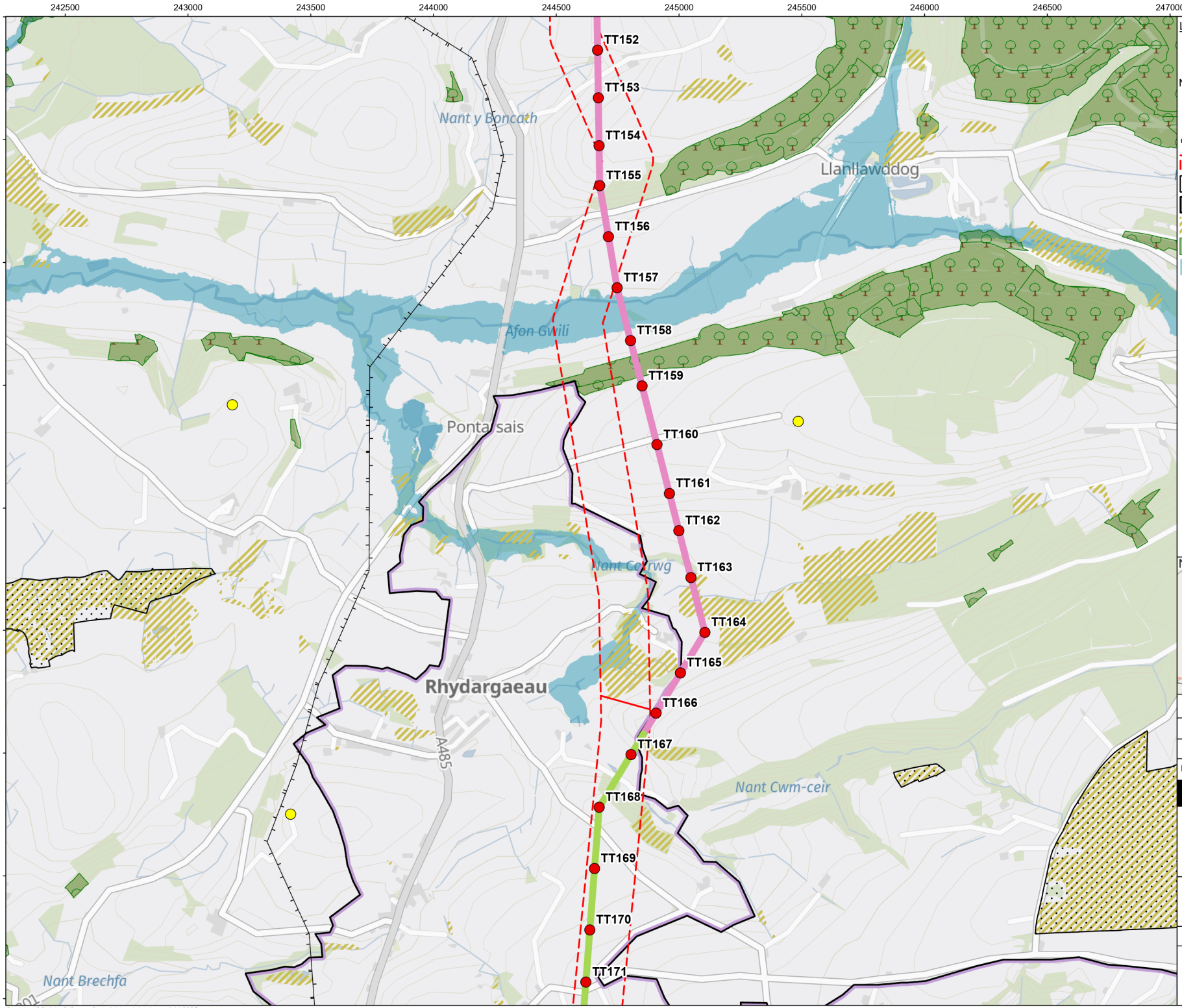

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

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Draft Route Alignment – Key Constraints

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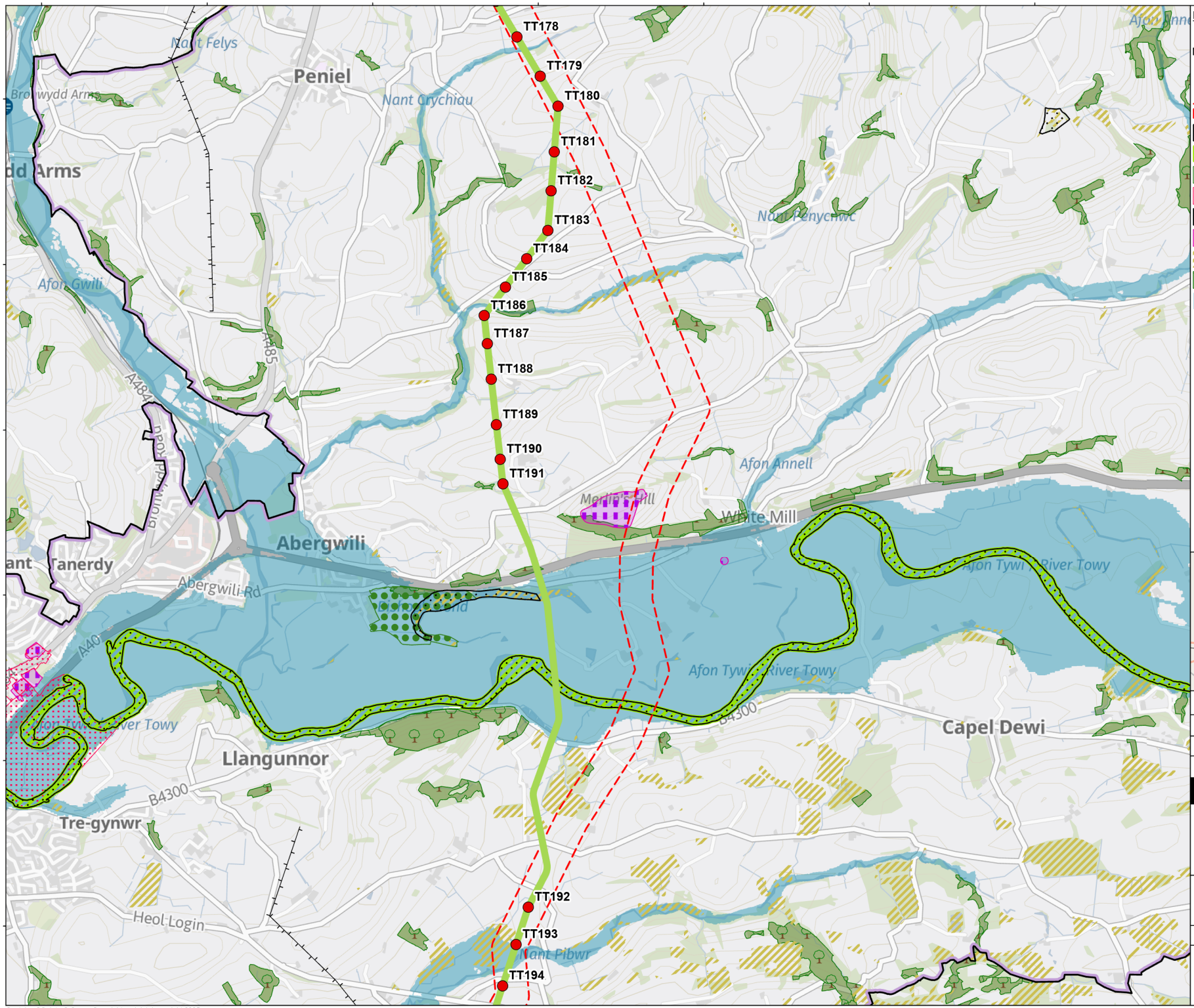

Legend:

- Tower
- Non Stat Round 2 Detailed Alignment
- Section 5
- Overhead Line (132 kV)
- Preferred Route Corridor Option
- Site of Special Scientific Interest
- Special Areas of Conservation
- Registered Parks and Garden
- Conservation Area
- Historic Landscape Area
- Scheduled Monument
- Priority Habitat
- Ancient Woodland
- Flood Zone

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

TITLE: Figure 8
Draft Route Alignment – Key Constraints

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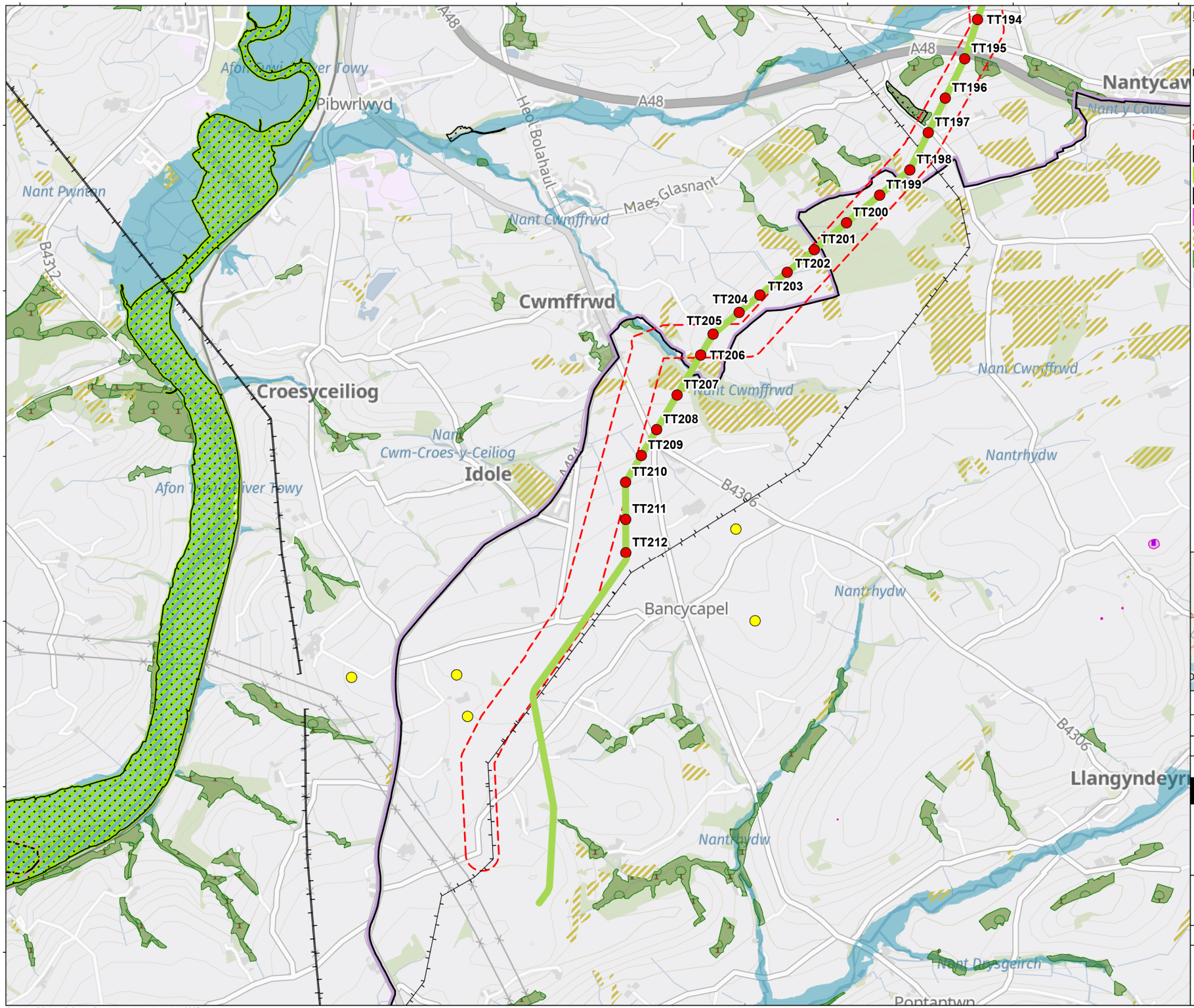

Rev	Date	Description	Drn	Chk	App
00	04/03/2024	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

TITLE: Figure 9
Draft Route Alignment – Key Constraints

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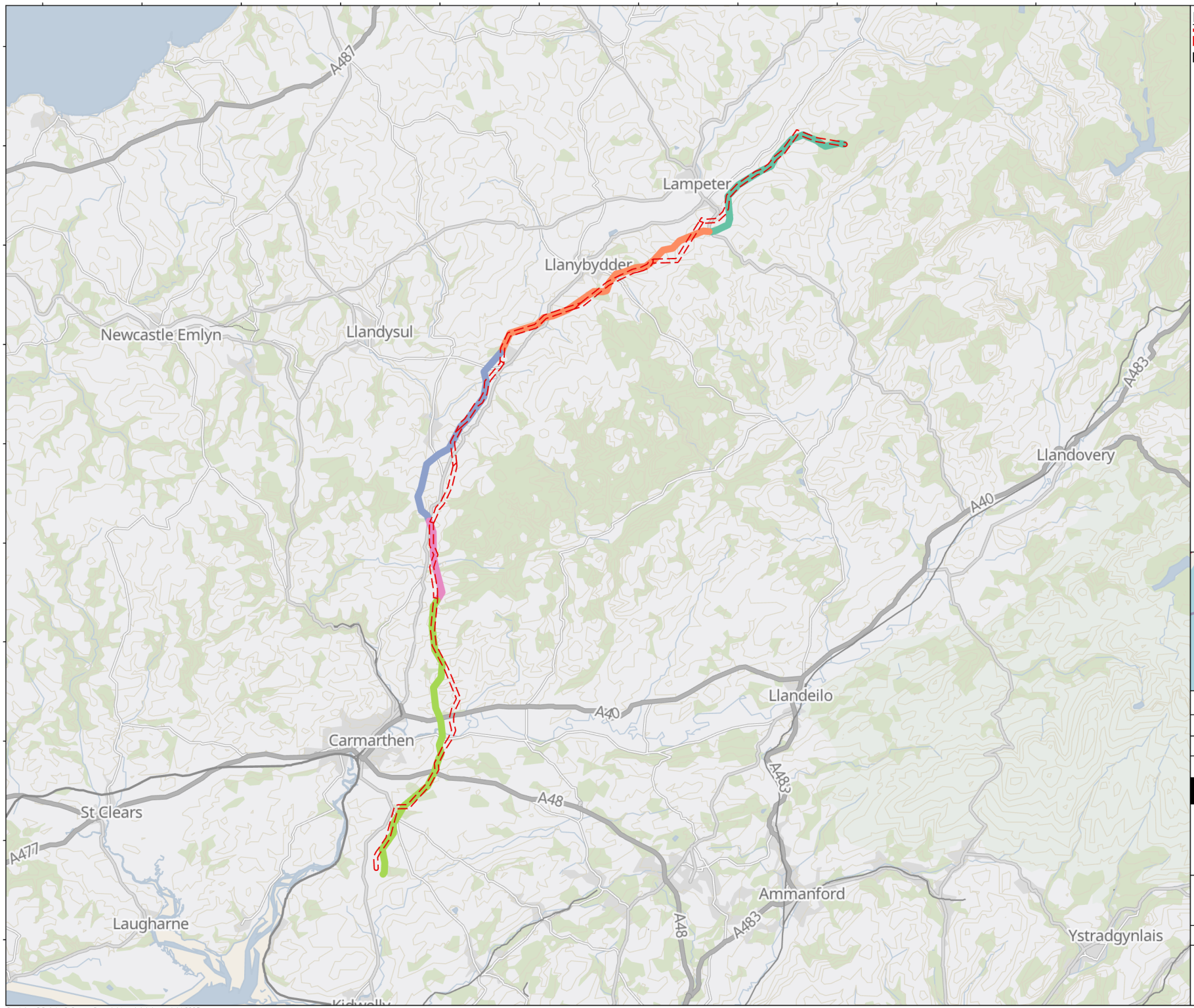

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- Preferred Route Corridor Option
- Non Stat Round 2 Detailed Alignment
- Section 1
- Section 2
- Section 3
- Section 4
- Section 5

Rev	Date	Description	Drn	Chk	App
00	04/03/2025	First Draft	FA	JR	DJ

Towy Teifi Connection Corridor

TITLE: Figure 10
Overview of Draft Route Alignment

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Kilometres
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REV 00

Path: RSK Group\RSK Environment GIS Projects - 663927 - Towy Teifi

GREEN GEN TOWY TEIFI

Consultation March 2025

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