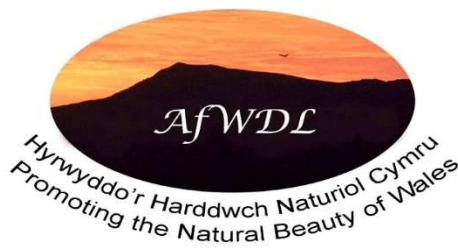


Alliance
for
Welsh Designated
Landscapes



Cynghrair
dros
Dirluniau Dynodedig
Cymru

Position statement on the proposed National Grid Bangor to Swansea Link

Background

The Alliance for Welsh Designated Landscapes (AfWDL), consists of representatives from the three Welsh National Parks Societies and from some of the National Landscapes (AONBs) in Wales.

The Alliance is delighted that National Grid is currently in the process undergrounding the pylons which pass across the Dwyrdd Estuary in the Eryri National Park. This shows a real understanding of the huge landscape impact of overhead lines and pylons in Designated Landscapes. We applaud this.

In March 2024, however, the National Energy Systems Operator published their [Beyond 2030](#) strategy to create a transmission network capable of meeting the needs of a decarbonised economy. This includes a proposal to build a high tension link between Bangor and Swansea. The document does not suggest any particular route for this link, which is shown indicatively as a green dashed line in the diagram reproduced below.

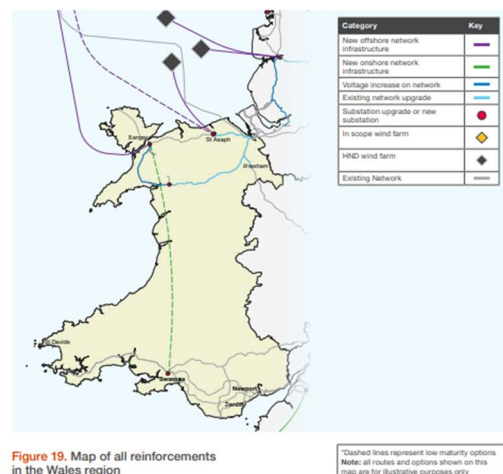
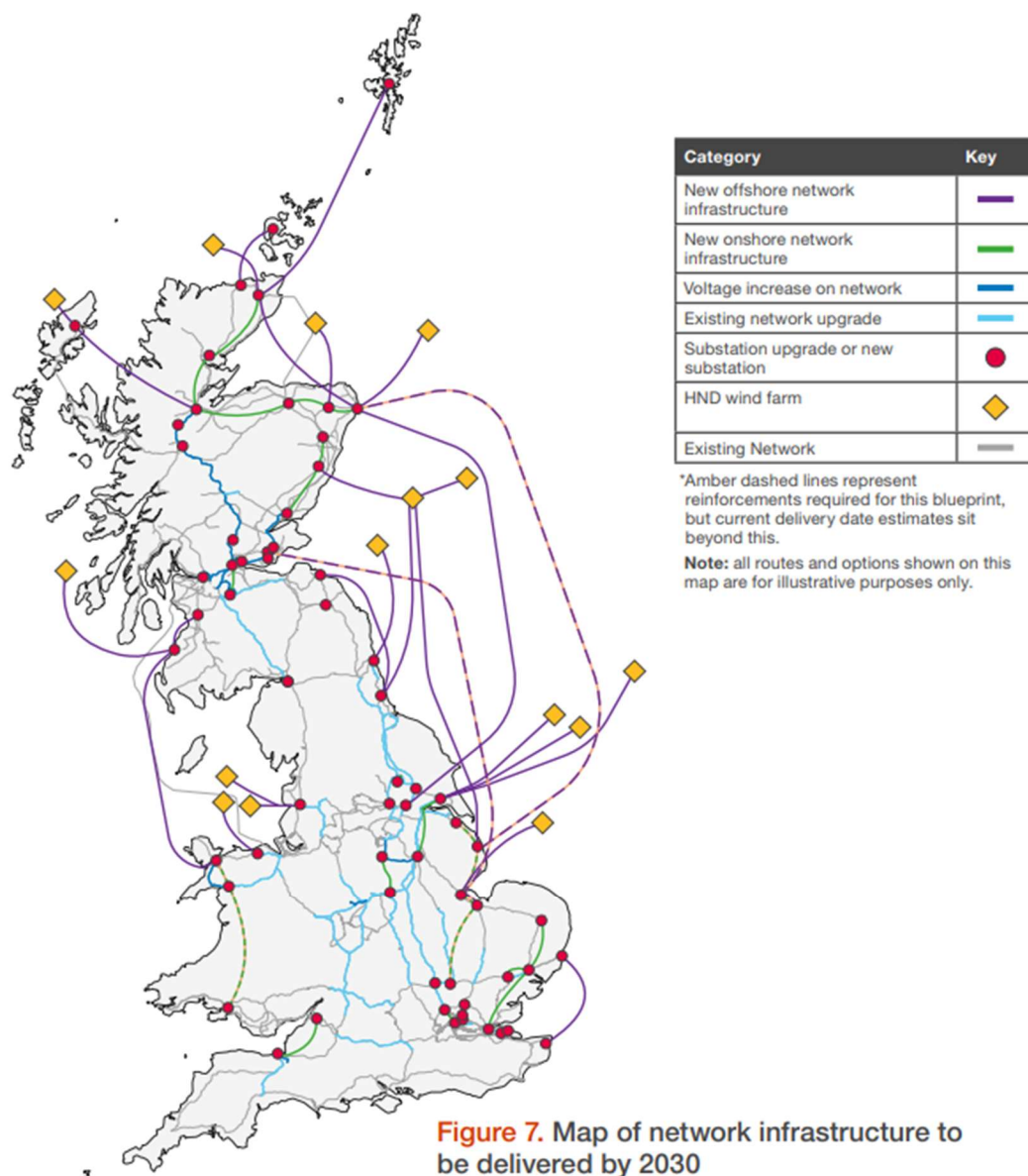


Illustration above – from Beyond 2030

There has also been speculation about a possible new pylon connection between Bodelwydden in Denbighshire and Llandyfaelog East of Carmarthen. Though this would not necessarily touch any existing National Park, it would pass right through the proposed new National Park in North East Wales, which is being promoted and supported by the Welsh Government.

It is interesting to note that, across the UK as a whole, the Beyond 2030 plans include a large number of offshore cables linking onshore locations. See illustration overleaf – also in Beyond 2030. That is, Scotland with Wales, Scotland with England and England with England. This demonstrates that offshore electricity links are both practical and affordable and that they often provide what is overall the best practical option.



Concern

The Alliance of Welsh Designated Landscapes is deeply concerned about the prospect of new overhead lines and pylons through the Eryri National Park, the Bannau Brycheiniog National

Park and also the Cambrian Mountains. The landscape impact of doing this would be immense. We note that crossing the Eryri or Bannau Brycheiniog National Parks would clearly be contrary to the [Holford Rules](#), which date back to 1959, and also Electricity Networks National Policy Statement EN-5. The Holford Rules state clearly:

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

There is a note that specifically recognises that National Park and Areas of Outstanding Beauty, or National Landscapes as they are now called, constitute area of the highest amenity value.

The Electricity Networks National Policy Statement Policy Statement EN-5¹, states, in paragraphs 2.9.20 and 2.9.21:

2.9.20 Although it is the government’s position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).

2.9.21 In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.

Proposals

The Alliance of Welsh Designated Landscapes proposes that that any new Bangor to Swansea high tension link is planned on the basis of a green grid sequential planning hierarchy including:

- A robust case needs to be made for new infrastructure - prioritising the use of smart grids and flexible systems to better manage demand
- Energy storage and efficiency need to be promoted
- If a Bangor to Swansea link is required, or indeed any kind of North-South link within Wales, the option of offshoring the route around West Wales should be the preferred option, subject to a satisfactory outcome to an environmental assessment of the impact on the marine habitat. Such an off-shore link could also become extremely useful in connecting off-shore windfarms to the grid. This would avoid the need for each windfarm to have its own cable to shore.
- If it is considered essential to link renewable energy projects in Mid-Wales, then this could be achieved by including a spur to link with renewable energy projects in mid-Wales² to the offshore cable between North Wales and Swansea.

¹ Available online here:

<https://assets.publishing.service.gov.uk/media/65a78a5496a5ec000d731abb/nps-electricity-networks-infrastructure-en5.pdf>

² Notably in 'pre-assessed areas for wind energy' indicated on page 129 of Future Wales 2024, which are all shown indicatively but clearly outside any proposed boundaries for a Cambrian Mountains National Landscape.

- In line with the Holford Rules, if an onshore link is required, then its route should avoid National Parks and National Landscapes. The Alliance is of the view that the Cambrian Mountains³ should also be accorded this status, due to its obvious very high landscape value.
- Though EN-5 calls for undergrounding high tension power lines to avoid harm to the landscape in National Parks and National Landscapes, this is not an easy solution. Both the economic costs and the ecological damage of doing this are potentially severe, particularly as many of the areas through which undergrounding would likely pass are pristine mountains and deep, rocky valleys.
- Any onshore route should avoid proximity to the boundaries of National Parks and National Landscapes, unless the visual impact from within designated areas is offset by substantial environmental gains as part of National Grid's 'Net Gain' approach
- The Grid Operator should consider the full environmental impact of the different options before considering value for money. That is, no realistic option should be ruled out on the basis of cost before the full environmental impact of all options has been assessed.

³ Until such time as the boundary of a Cambrian Mountains National Landscape is defined, this statement applies to the boundary proposed by the Countryside Commission in 1972.