



GREEN GEN CYMRU

Rhiwlas Green Energy Network Phase one non-statutory consultation report

November 2024

Contents

Contents	2
EXECUTIVE SUMMARY	3
INTRODUCTION	4
1. The Rhiwlas Green Energy Network	4
2. About the Developer	4
3. Project Background	5
4. Proposal Development	6
METHODS OF CONSULTATION	8
1. Introduction	8
2. Purpose of the consultation	8
3. Approach to consultation	9
PROMOTION	15
1. Promotional materials	15
FEEDBACK PROCESS	17
1. Introduction	17
2. Processing	18
FEEDBACK RECEIVED	20
ISSUES RAISED IN CONSULTATION RESPONSES AND RESPONSES FROM APPLICANT	40
NEXT STEPS	51
APPENDIX	52

EXECUTIVE SUMMARY

This Rhiwlas Green Energy Network (Rhiwlas GEN) consultation report outlines Green GEN Cymru's initial, non-statutory consultation on a new renewable energy infrastructure project in Wales. This project aims to address local grid capacity challenges by building a 132kV overhead line connecting the proposed Banc Du and Rhiwlas Energy Parks with a substation near Cefn Coch, along with an underground cable between the two parks. The consultation report covers project background, the developer's approach to route planning, and details of the community engagement and feedback process.

Key highlights from the consultation include:

1. The need for new infrastructure:

Green GEN Cymru, part of the Windward Energy group, seeks to support Wales' transition to renewable energy by developing this infrastructure to connect new clean energy sources to the national grid. The project's design includes environmentally sensitive routing and construction practices.

2. Consultation Approach:

The consultation, held from November 2023 to January 2024, used a mix of in-person and digital engagement methods, including public events, leaflets, letters, emails, social media, and a project website. A 1km consultation zone around the proposed route ensured targeted communication with affected residents, landowners, and stakeholders.

3. Feedback Themes:

Responses from community members and stakeholders raised several recurring themes:

- **Environmental and Visual Concerns:** Many participants expressed concerns about the project's visual impact on the landscape and potential damage to local biodiversity. Calls were made to consider underground routing in areas like Trefeglwys to preserve scenery and reduce disturbance.
- **Economic and Community Benefits:** Participants emphasised the need for local benefits, such as reduced energy costs or reinvestment in community initiatives, as well as worries about potential negative impacts on property values, tourism, and local businesses.
- **Preference for Alternatives:** There were suggestions for alternative renewable energy sources, such as solar or offshore wind, and a preference for avoiding overhead lines.
- **Location of consultation events:** Some respondents noted a lack of consultation in specific communities, particularly Trefeglwys, and sought clearer communication and responsiveness to local concerns.

4. Next Steps:

Green GEN Cymru plans to incorporate community feedback into further technical evaluations and route assessments. The next consultation phase will focus on detailed route alignment and will take place before statutory planning applications are submitted.

This report underscores Green GEN Cymru’s commitment to environmental sensitivity, transparency, and stakeholder engagement as it advances the project towards securing planning consent.

INTRODUCTION

1. The Rhiwlas Green Energy Network

The Climate Emergency is a threat to our planet and our communities. As a result, the Welsh and UK governments have set legally binding targets to reach net zero (the balance between the amount of greenhouse gas emitted, versus the amount removed from the atmosphere) by 2050, encouraging people to act now, to ensure the future is protected.

For Wales to meet the Welsh Government’s target of 100% of its electricity needs from renewable sources by 2035, we will need to move quickly to bring forward new renewable energy projects and supporting infrastructure, to ensure a more sustainable, improved and secure energy grid.



In Mid Wales, however, the existing electricity network does not have the capacity to connect new renewables to homes and businesses. To end the use of fossil fuels and address the climate emergency we need new infrastructure – and quickly.

Green Generation Energy Networks Cymru (Green GEN Cymru) is therefore proposing an overhead line connecting from Bute Energy’s Banc Du and Rhiwlas Energy Parks to a collector substation site in the Powys uplands, near Cefn Coch, as well as a new underground cable connection between the two proposed Energy Parks. These connections form the Rhiwlas Green Energy Network (Rhiwlas GEN) project.

2. About the Developer

The Project is being developed by Green GEN Cymru, part of the Windward Energy Group group. Green GEN Cymru intends to develop, own and operate a 132kV independent distribution network to connect Welsh renewable energy generation to the existing grid network.

Green GEN Cymru is an Independent Distribution Network Operator (IDNO) licence holder therefore is able to undertake these proposed developments. Statutory duties require IDNO licence holders under the Electricity Act 1989 to develop a grid network which balances technical, economic, and environmental factors whilst having regard to the desirability of preserving the environment and doing what can reasonably be done to mitigate any effect the proposals may have on the natural environment.

Green GEN Cymru intends to design, build and operate the proposed 132kV distribution network needed to connect new Welsh clean, green energy projects to the electricity transmission network, helping to get green energy to homes and businesses across Wales and beyond.

Green GEN Cymru, subject to appropriate planning consents, will pay for the construction and maintenance of the new electricity distribution network, whilst the electricity generators will pay an annual charge for using the distribution network. This provides Green GEN Cymru with a return on its assets. As an IDNO, Green GEN Cymru is required to offer connections to third party developments in line with the licence conditions.

Green GEN Cymru, part of the Windward group of companies, is based in Wales and developing an electricity grid network in Wales – helping to meet the future needs of Welsh people, communities and businesses, taking clean, green energy safely and securely from where it is generated to our homes, hospitals, schools, businesses, and communities.

Green GEN Cymru is playing a pivotal role in providing a reliable and robust distribution network that will support tackling the energy and climate crisis. The grid network currently being developed will also have the capacity to support technologies like 5G that could help farmers, schools and businesses be at the cutting edge of technology while being based in rural areas.

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

3. Project Background

The existing electricity network in Wales does not have the capacity to connect new energy generation to the national electricity grid. Furthermore, if we do not upgrade the electricity network, we risk missing renewable targets and failing to address the climate emergency.

Green GEN Cymru is therefore seeking to address these issues by proposing a new connection. The Green GEN Rhiwlas Connection Project comprises a 132kV overhead line (OHL) using single circuit double wood poles¹ and approximately 3km of an underground cable route. New wood poles are dark brown in colour and weather over the year to a light grey. The poles have an average height of 15m, with a typical span between the poles of about 85m.

The proposed overhead line will connect the proposed Banc Du and Rhiwlas Energy Parks to a substation, circa 35km to the northwest. A circa 3km underground cable will link the two energy



¹ Pole height and span lengths may be required to be increased where circumstances dictate, e.g., road and railway crossings, elevated land, structures, or features.

parks, with the OHL commencing at Rhiwlas Energy Park, linking to a proposed Substation at Bryngwyn, near Cefn Coch.

More information about the Rhiwlas and Banc Du Energy Parks can be found at rhiwlasenergypark.wales and bancduenergypark.wales, respectively.

4. Proposal Development

Approach to routeing Grid infrastructure in Wales

Green GEN Cymru has published a document titled *Approach to Routeing Grid Infrastructure in Wales*. This Approach sets how Green GEN will develop grid projects that would be located primarily in Wales and would follow the Developments of National Significance (DNS) planning process. It includes a routeing methodology and an approach to Environmental Impact Assessment (EIA) for all its projects.

The purpose of the Approach is to provide stakeholders and consultees with clarity on how projects will be developed and to ensure consistency in Green GEN Cymru's approach to developing projects in Wales.

The Project has been developed in accordance with Green GEN Cymru's published *Approach to Routeing Grid Infrastructure in Wales*.

Options appraisal

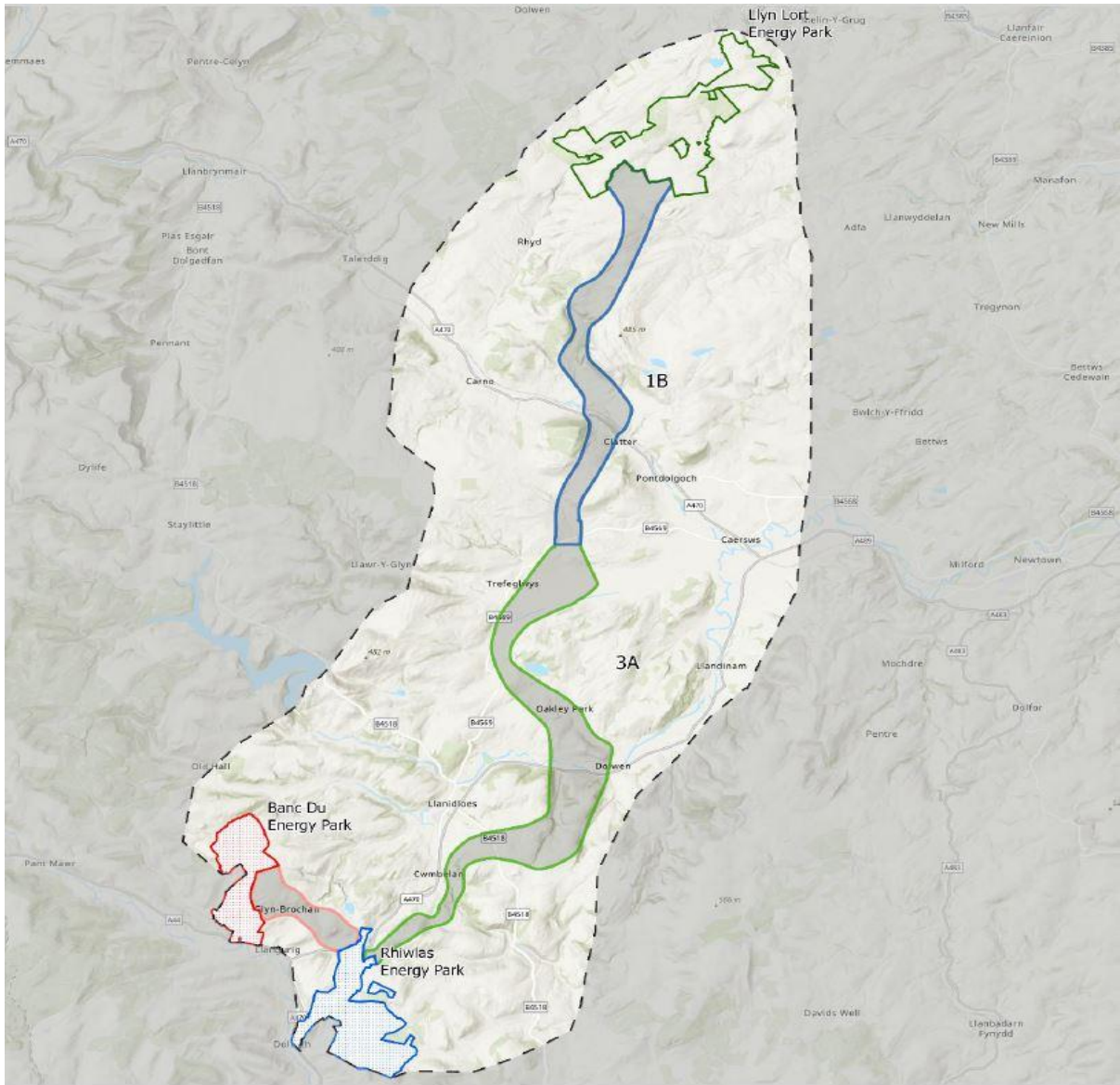
Several route options were identified through analysing the environmental and technical considerations in the study area. The approach focused on avoiding or minimising interaction with the key environmental constraints, including National Parks and designated landscapes, ecological designations and cultural heritage sites (Scheduled Monuments, Conservation Areas, Registered Historic Parks and Gardens). Other considerations include communities and buildings, topography and existing infrastructure (e.g. overhead lines [OHL], roads and railways).

The route options were analysed and compared, and our **preferred route corridor** was identified, on the following basis:

- the preferred route corridor is a direct route, which avoids key environmental constraints and did not identify any significant technical challenges; and
- limiting the impact on the number of communities and buildings within the vicinity of the route options.

Several route options were considered during the preferred route selection. These options are shown in **Appendix A**.

The preferred OHL route, which was presented as part of the consultation process, is approximately 35km long and is shown in **Fig. 1**, below. Consultation feedback received from local communities - the analysis and findings of which is outlined in this document - will be considered, when developing a proposed route for further assessment and consultation.









- Legend**
-  Study Area
 -  Banc Du Energy Park
 -  Rhiwlas Energy Park
 -  Llyn Lort Energy Park
 -  Route Option 1B
 -  Route Option 3A
 -  Route Option 4

Fig. 1

METHODS OF CONSULTATION

1. Introduction

This section sets out how Green GEN Cymru undertook its first phase of consultation (non-statutory consultation) for the Project. As a company 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. Green GEN Cymru is committed to providing clear and up-to-date information on its proposals and listening to local people and consulting them at each stage where their views can help to shape Green GEN Cymru's proposals before consent applications are submitted.

Green GEN Cymru recognises that finding a route for the Project is a complex process, and its consultation strategy goes beyond the [Planning and Environment Decision Wales \(PEDW\) good practice guidance](#)² to ensure that local people can comment at each stage of the routing process.

Green GEN Cymru's approach to engagement for the Rhiwlas Green Energy Network is to carry out three phases of consultation with local communities and other stakeholders, beginning at an early stage, to give people the opportunity to provide feedback and insight at the formative stage ahead of more detailed design work being carried out.

The three rounds of pre-application consultation that will be carried out are:

- phase one non-statutory consultation with local communities on the work to date, to develop the project and specifically the preferred route corridor (contained within this report);
- phase two non-statutory consultation on a detailed route alignment for the Project, including the updated Project corridor and proposed pole locations, to be undertaken in late 2024; and
- statutory consultation on the draft planning application, which is planned for mid-2025.

This approach to both non-statutory consultation and statutory consultation is guided by the Developments of National Significance (Wales) Regulations 2016 (as amended) and PEDW's Pre-Application Community Consultation: Best Practice Guidance for Developers (December 2021) document.

2. Purpose of the consultation

Whilst there is a strategic need for the for the development of new transmission and distribution grid infrastructure (as set out in the Welsh National Policy and Guidance (*Future Wales and Planning Policy Wales*) and the Project (as detailed in **sections 3** and **4** above), it is imperative to engage with all relevant stakeholders to clearly understand their views, needs and priorities. This enables Green GEN Cymru to better understand and evaluate any community concerns, address any misunderstandings regarding the presented corridor option for the Project, and,

² <https://www.gov.wales/sites/default/files/publications/2021-12/planning-major-developments-guidance-on-pre-application-consultation.pdf>

where appropriate, further refine it in a manner that better meets consultees' needs, priorities and stated preferences.

The overall objective of the non-statutory consultation was to present relevant and meaningful information about the Project in a clear and accessible manner, so that stakeholders and the public could consider it and provide an informed response. This approach contributes to, and supports, the DNS process.

The consultation was carried out in line with best practice and included:

- the case for the 132kV overhead line (OHL) using single circuit double wood poles, detailed in the Routing and Consultation Document (RCD) for the Project;
- the preferred overhead line route corridor option;
- benefits and constraints of the proposed new infrastructure;
- pro-active engagement with residents, including landowners and businesses, to understand their views on the Project and option presented;
- consultation with relevant local authorities, political stakeholders and other prescribed consultees at a formative stage, to ensure technical advice and local knowledge is, and can be, considered; and
- addressing any questions regarding the route and evolving design options.

3. Approach to consultation

The consultation took place between 15 November 2023 and 10 January 2024.

In response to changes in stakeholder engagement habits and behaviours following the Covid-19 pandemic, Green GEN Cymru has adopted a hybrid approach to consultation, and this is the approach that was implemented during the Rhiwlas Green Energy Network Stage 1 (non-statutory) consultation. By hybrid approach, we mean a consultation that covers a mix of traditional (e.g. hard copy information for stakeholders, such as brochures and leaflets), in-person (e.g. consultation events at venues in the community) and digital methods (e.g. website covering key information about the Project) outreach and engagement. This enables stakeholders to view consultation materials - and provide feedback - through a means that feels most appropriate to them.

3.1 Audiences

Although a non-statutory consultation (and therefore not prescribed by planning legislation), every effort was made by Green GEN Cymru to approach all relevant stakeholders, local communities and relevant organisations that may be affected by the Project, including those likely to be classed as community consultees, specialist consultees or relevant persons during future statutory consultation.

A full list of those stakeholders contacted can be found in **Appendix D**.

3.2 Contact channels

It is recognised that different communication methods can suit different parties; consequently, a range of different channels were opened as part the consultation. This was to maximise the opportunities available for stakeholders to respond and engage.

Those wishing to contact the project could do so via:

- a designated email address info@rhiwlasGEN.wales;
- writing to the project team at **TC FREEPOST CONSULTATION**
- calling the freephone number 0800 699 0081, available Monday to Friday during the consultation period, between the hours of 09:00 and 17:00 (excluding public holidays)

Further details about digital response routes and hard copy options can be found in **3.4** and **3.8** below.

3.3 Consultation materials

The following materials were produced and shared extensively during the consultation. Copies of all materials described below are included in **Appendix C**.

3.3.1 Consultation information leaflet

A bilingual (English / Welsh) leaflet provided a brief overview of the need for the Project, as well as an overview of the Project proposals. The leaflet also drew attention to the consultation dates for the Project, the venues/dates for in-person consultation events and how to find out more/provide feedback. It was sent to a total of 3255 residential and commercial property addresses within a 1km radius of the edges of the preferred route corridor.

3.3.2 Consultation brochure

A bilingual (English/Welsh) detailed colour brochure outlining the proposals was produced and made available at events for attendees to browse on site and take away from the venue for further consideration, if attendees wished. The brochure was also available in hard copy to those that requested it, and a copy was also available on the Project website.

The brochure contained:

- an introduction to the Project
- who Green GEN Cymru is and the work they do
- the need to develop the Project
- further details about the Project, including a summary of what the OHL will look like
- the proposed route corridor and section maps
- details about the consultation, in person events (including dates and times) as well as how those with an interest could get involved and provide feedback

3.3.3 Feedback Form

A feedback form was produced, which aimed to:

- elicit a basic amount of demographic data about respondents

- ascertain whether they were a landowner (and if so, whether they had been approached by the relevant Land Referencing teams about their land)
- seek focused feedback on the overall route and whether respondents had noted factors that had not been considered regarding the identification of the route
- seek focused feedback on sections of route as outlined in 3.5
- ascertain how they had heard about the consultation and whether they wished to be kept up to date with future stages of the project
- understand their preferences in relation to various themes related to Community Benefit
- seek focused qualitative feedback in relation to Community Benefit (respondents' views on where they felt the Community Benefit Fund should be invested/organisations or people that the Project team should speak to in relation to this)

There were also a number of optional questions added, which broadly sought views and opinions on two topical themes, namely 'climate change' and our 'energy supplies'.

The feedback form was made available in hard copy and digital formats, in two different language versions (English/Welsh). Digital and hard copy access therefore enabled consultees to either fill in by hand and post back using the project's Freepost address, complete online via the Project website (see 3.4 for further details) or send to the consultation email address.

Consultees could also request printed copies of the consultation feedback form by contacting the Project directly.

Details of the Freepost address for the Project, the consultation email address and Project telephone line can be found at 3.2.

Further details relating to the feedback form can also be found at 3.8.

3.3.4 In-person consultation event banners

Twelve exhibition style bilingual (English / Welsh) banners were produced by Green GEN Cymru to facilitate and inform engagement during in-person consultation events.

They covered the following areas:

- a summary/background about Green GEN Cymru - 'About Us'
- the climate emergency, covering the need for the project 'The Climate Emergency'
- the reasons/background for the project 'Why do we need to develop the project,' including -
- 'Plans' – outlining how the 132kV OHL will be supported, the broad locations for this, the connection points and the new lower voltage underground cabling proposed connecting Banc Du and Rhiwlas Energy Parks
- an 'overview' of the whole route corridor, with map
- 'Section 1: Cefn Coch (Llyn Lort Energy Park) – Carno – Trefeglyws' including maps and summary
- 'Section 2: Trefeglwys – Llanidloes – Llangurig (Rhiwlas Energy Park)' including maps and summary

- ‘Section 3: Rhiwlas Energy Park – Banc Du Energy Park (underground)’ including maps and summary
- ‘Our Project Timeline’ with key milestones/dates in an infographic and explanation
- information as to how ‘Bute Energy [is] Investing in Communities’ (note this banner was distinct from the rest as it was in line with Bute branding and livery, as the Community Benefit Fund is managed and administered by Bute)
- how people can ‘Have their Say’ and find out more in Welsh i.e. ‘Dweud Eich Dweud’ / Rhagor o Wybodaeth
- how people can ‘Have their Say’ and find out more in English

The banners were also made available on the Project website and are available to view in full in **Appendix C**.

3.3.5 Routing and Consultation Document (RCD) and Non-Technical Summary RCD

A routeing consultation report - Routing and Consultation Document (RCD) - was prepared, providing further details of the initial work undertaken to identify a preferred route corridor for the grid connection. This involved identifying and reviewing environmental features in the wider study area, identifying and appraising various route options.

The aim of the routeing process is to minimise the environmental impact of the preferred route option, while selecting a route that is technically and economically viable.

For additional accessibility and ease of understanding, a ‘non-technical’ summary (NTS) of the RCD was also produced, in plain language. This accompanied the main RCD consultation document as part of the consultation.

3.3.6 Additional supporting documentation

Additional supporting documents which explained how the Project has developed over time were also made available to view at in-person consultation events and on the Project website. These included:

- Green GEN Cymru’s **Approach to Routeing Infrastructure Across England and Wales**
- Green GEN Cymru’s **Green GEN Phase 2 Grid Connection Strategy**

These documents can both be found in **Appendix C**.

3.4 Project website

At the start of the non-statutory consultation, Green GEN Cymru launched a dedicated consultation website for the Rhiwlas Green Energy Network (Rhiwlas GEN):

www.rhiwlasgen.wales

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

The website contained all consultation materials that were made available (outlined in section **3.3** and **Appendix C**). It also contained dates and times of in-person consultation events and an electronic version of the feedback form (see **3.3.3**), where consultees could choose to submit their responses.

An interactive map detailing the preferred route corridor was available as part of this resource.

The Project website remains live following the close of the non-statutory consultation to publish Project updates, as well as provide details of what was consulted on during the consultation period.

3.5 Route corridor consultation sections

To enable stakeholders to identify locations close to, and within, the preferred route corridor that are important to them and encourage meaningful feedback, the preferred route corridor was presented as three sections in the consultation:

- **SECTION 1:** Cefn Coch (Llyn Lort Energy Park) – Carno – Trefeglwys
- **SECTION 2:** Trefeglwys – Llanidloes – Llangurig (Rhiwlas Energy Park)
- **SECTION 3:** Rhiwlas Energy Park – Banc Du Energy Park

A similar level of information about each section was provided in the consultation brochure, on the postal leaflet and consultation event banners, as well as the Project website. This was equally the case with regards to the consultation feedback form.

Copies of the relevant map sections, as presented at consultation, can be found in **Appendix B**.

3.6 Consultation zone

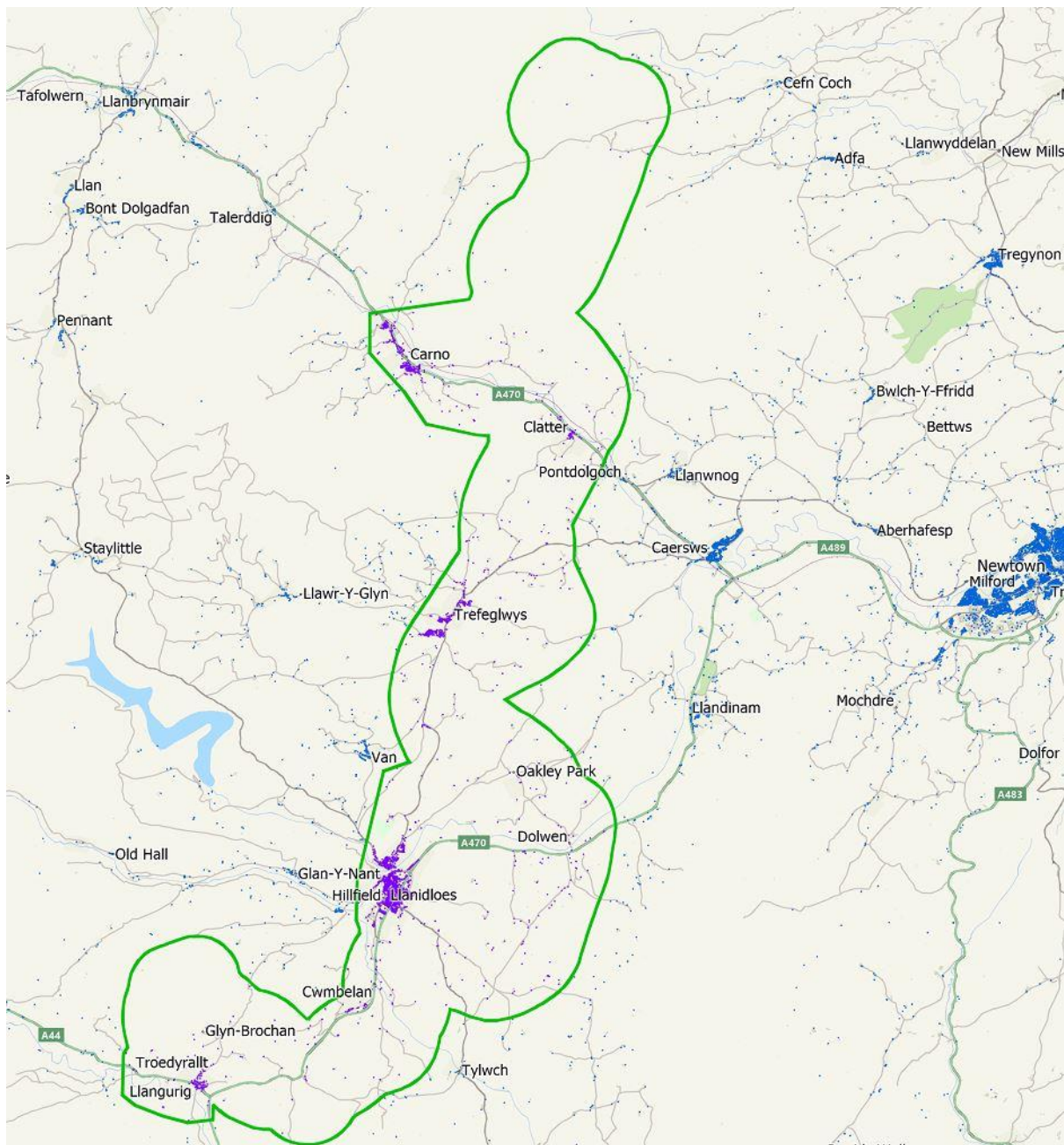
A 1km radius from the edges of the cable corridor was identified, including all properties and businesses within this, to create a consultation zone (a geographic area which defines the area of focus for the consultation). This 1km radius is consistent with other Green GEN projects and where the 1km buffer bisected or crossed a road or street of homes, the boundary was extended to include the whole settlement. The total number of addresses within the consultation zone identified was 3255.

Within the consultation zone, leaflets (as described in **3.3.1**) were sent to both commercial and residential addresses. Where land interests were identified within the consultation zone, relevant addresses were noted for both freeholders and leaseholders of such interests, and they were contacted by the Land Agent via a bespoke letter (described in **F1.7**).

In cases where landowners were noted outside of the consultation zone (for example, where land interests identified via Land Registry information fell within the consultation boundary, but the freeholders themselves resided outside of this) relevant contact addresses were added to the mailing list manually and consequently, such contacts received both a letter and leaflet.

Figure 2 below illustrates the consultation boundary:

Fig. 2



3.7 Consultation events

Three consultation events were held on Thursday 30 November, Friday 1 December and Tuesday 5 December 2023, to provide communities living along the proposed connection route the opportunity to learn about the proposals, to view maps and documents and to meet and ask questions of the Project team in person.

To maximise the opportunity for anyone with an interest in the Project to get involved, the Project team explored several venues within the consultation zone, with a view to holding three events at locations that would be easily accessible for as many local communities as possible along the route.

The events were promoted through the Project leaflet, Project website, consultation brochure, a press release, social media thumbnails and associated text and via emails issued to stakeholders. Wherever possible, the Land Referencing team for the Project also made landowners aware of the consultation as part of their dialogue with those identified as having a land interest within or near to the consultation zone.

For further information concerning the promotion of the consultation, see the section **F**.

The dates, venues and number of attendees recorded at each of the events are listed below:

Event	Number of attendees
Thursday 30 November 2023, 14:30 to 19:30 Cefn Coch Inn, Welshpool, SY21 0AE	22
Friday 1 December 2023, 14:30 to 19:30 Llangurig Community Centre, Llangurig, Llanidloes, SY18 6SG	38
Tuesday 5 December 2023, 15:00 to 20:00 Carno Community Centre, Carno SY17 5LH	36
Total	96

PROMOTION

1. Promotional materials

A series of additional activities were undertaken to raise awareness of the non-statutory consultation, as set out below. Copies of all materials described below are included in **Appendix C**.

1.1 Consultation leaflet

To initially notify consultees of the project and the details of the consultation, a leaflet was sent to all addresses identified within the consultation zone. See **E3.6** for further information.

1.2 Introductory emails

To maximise awareness of the consultation among known stakeholders, emails were sent from the Project team to key stakeholders on 10 November 2023. This initial correspondence was tailored, to take into account the level of previous engagement with other Green GEN or Bute projects. It included brief details of the Rhiwlas Green Energy Network Project, timings of the consultation and also offered the opportunity of a meeting to discuss the Project in more detail.

A second, follow-up email was sent on 14 November, which included copies of all the Project materials including maps, newsletter, brochure and feedback forms. It explained how stakeholders could provide feedback and the multi-stage nature of the whole consultation

process (i.e. this being the first non-statutory consultation of two, followed by a statutory consultation in due course).

A copy of the letters issued, and details of the stakeholders contacted are included in **Appendix D**.

1.3 Social media advertising

A social media campaign was also undertaken throughout the consultation via Green GEN Cymru's LinkedIn and 'X' (formally Twitter) channels.

Posts were designed to inform stakeholders of the start of consultation and promote engagement, highlight in-person events, encourage consultees to provide feedback and, at the end of the consultation period, notify that the non-statutory consultation had closed.

The campaign was implemented to extend beyond the consultation zone and make a wider range of communities aware of the consultation and how to take part.

Examples of social media posts made can be found in **Appendix E**.

1.4 Project website and statistics

Information regarding the consultation was made available on the Project website.

Other methods of promotion (listed here within section **F1**) also aimed to drive traffic towards the Project website, the address of which was highlighted on all consultation literature.

Throughout the consultation period, the pages on the website received 1,443 unique visitors.

1.5 Consultation brochure

A full colour brochure was made available during the project, the full details of which can be found in section **E3.3.2**.

1.6 Press releases

A press release giving an overview of the Project and highlighting the consultation events was compiled and issued, to launch the start of the consultation process. The release also provided details of where people could find out more information. This was sent to local and regional media outlets.

The project received coverage in the following outlets:

- Cambrian News
- ReNEWS - <https://renews.biz/89479/green-gen-cymru-opens-welsh-grid-talks/>
- Powys County Times
- MyWelshpool - <https://www.mywelshpool.co.uk/viewernews/ArticleId/24989/Power-giant-reveals-new-pylon-corridor>
- Wales Farmer - <https://www.walesfarmer.co.uk/news/23927290.bute-energy-reveals-new-pylon-plans-powys-windfarms/>

Examples of media coverage made can be found in **Appendix E**.

1.7 Introductory letters to landowners

The Land Referencing team for the Project also made landowners aware of the consultation as part of their dialogue with those identified as having a land interest within or near to the consultation zone. This was done both verbally and via the issued introductory landowner letter.

Further information about landowner engagement can be found in **Appendix F**.

FEEDBACK PROCESS

1. Introduction

Responses to the consultation arrived with the Project Team in a number of ways – via online response form (linked to the Project CRM), hard copy response form (identical in content to the online response form, but received via the Freepost address) email (to the Project email address), hard copy letter (hard copy responses received by post, not written on the Project’s designated response form), and telephone, via the Project freephone contact number. These are further detailed in **G2.1 – G2.4**, below.

All feedback received as part of the consultation was reviewed and analysed by members of the Project team. This section describes how feedback received during the non-statutory consultation was processed and analysed.

1.1 General note on feedback analysis

Qualitative analysis was employed for each ‘open’ question, to arrive at an overall issue(s) summary for each.

By reading the narrative of each question response line by line, the team were able to assign an initial ‘code’ to each distinct issue raised for that question. As responses were worked through (for each respondent per question), either common issues were raised that could be categorised under the same or similar code between respondents (i.e. a response could be coded under a ‘Tier 2’ code, already established) or new issues arose (i.e. those issues or concerns not necessarily fitting into previously established ‘Tier 2’ codes already specified). Where this was the case, a ‘new’ code was added to the wider list of ‘Tier 2’ codes already created for that question. For example:

Question 1: Do you have any overall comments about the preferred route corridor we have identified for the Rhiwlas Green Energy Network?

Code (Tier 2)	Code/Theme (Tier 1)
Wooden poles better than steel pylons	Wooden Poles
Wooden poles - sympathetic to landscape	
Already have poles nearby (considered negative) /too many in close proximity	

Refusal stated in terms of being able to put poles on land

The analysis was data driven (i.e. ‘codes’ were not devised in advance of reviewing the responses) and, as explained above, continued to evolve until the analysis of the final response.

The review of the combination of Tier 2 codes, resulting in Tier 1 themes, formed the basis of key issues summaries for each question.

In relation to emails, letters and brief phone call summaries, where relevant – these were analysed in the same manner as above – to provide an issues summary.

2. Processing

2.1 Online response forms

Once submitted, responses provided by consultees via the online Feedback Form were immediately stored within the Project CRM. In relation to processing these submissions, closed question responses were treated as per **G2.1.3**. Data received for ‘open questions’ was directly exported from the Project CRM into Excel and then coded, by question.

2.1.1 Note on ‘confirmed’ response forms

‘Confirmed responses’ registered in the Project CRM were those where a respondent had clicked on a verification link, to confirm their email address. This verification link was sent to consultees on submission of their response.

2.1.2 Note on ‘unconfirmed’ response forms

In contrast to **2.1.1**, ‘unconfirmed responses’ registered in the Project CRM were those where a respondent had not clicked on an email verification link, which they would have received after they had submitted their response.

2.1.3 Closed question CRM analytics

Data from the online closed questions was available immediately in the Project CRM. Once all responses were submitted (online response forms and manual inputting of hard copy response forms – see note concerning manual entry in **G2.2** below), this allowed for an analytics report of the closed question data to be run straight from the Project CRM. The closed question response findings and commentary can be found within **Section H**, below.

2.2 Hardcopy response forms

Hardcopy feedback forms received through the Freepost address were collected, scanned and then securely stored. The information included within the hardcopy feedback forms received was then manually input into the Project CRM in the same format as was used for forms completed online.

2.3 Email feedback and hard copy letters

Emails were captured as ‘enquiries’ in the Project CRM and were also input into the analysis database. Any attachments were saved as an ‘activity’ on the Project CRM. The details of hardcopy letters were entered into the Project CRM and then imported into the analysis database.

All feedback emails and letters were manually reviewed and coded, including attachments where available, using Excel for the data. These are analysed in Section H under *Email responses, hard copy letters and telephone queries (H4.3)*. It is important to note that those submitting email feedback and hard copy letters did not respond specifically in line with the questions asked on the Feedback Form designed for the consultation, preferring instead to write in a freeform way on multiple topics. Consequently, it is not possible to attribute these answers as ‘belonging’ to – or answering - an individual question posed on the Feedback Form and therefore these responses have been treated, but taken account of, separately.

2.4 Phone enquiries

Where phone enquiries for information only were received, these were signposted to the appropriate Project team member for action. However, in the event that queries gave views or opinions, these were noted in brief. These brief notes were then taken account of alongside the direct email feedback and hard copy letter responses received and outlined in **G2.3**.

Note, the vast majority of calls to the project telephone line were information requests only, or requests to be put in contact with a member of the Land Referencing team. Stakeholders were always alerted to the in-person events where relevant and always encouraged to submit feedback in writing, either via online form, or via hard copy feedback form routes - any comments incorporated in this way were therefore small in number.

2.5 Anonymising of responses

Respondents were anonymised during coding and given a simple ID as part of the process. Prior to the coding process taking place for open, qualitative questions, a secure ‘Master’ Excel document containing all the data to be coded was compiled. Tabs (and therefore data) in this document were divided into emails, letters and phone calls received (tab 1), paper feedback forms received (tab 2), ‘confirmed’ online feedback forms (tab 3) and ‘unconfirmed’ online feedback forms (tab 4).

FEEDBACK RECEIVED

1. Note on interpreting the feedback

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

2. Number of responses received

Telephone calls – 5

Paper Feedback Forms – 16

Emails – 21

Letters – 3

Online Feedback Forms - 35

3. Closed question responses

3.1 Introduction

The following presents the answers given to each of the closed questions on the feedback form, for those who responded to the consultation via this method and chose to answer the question.

Those who submitted feedback forms were able to answer questions about their age. This was answered by every respondent. The largest number of respondents were in the age range of 56-70 (57.14%). The next largest was people who were aged between 41-55 (29.73%). Nobody was aged under 25 and only five people were aged between 26-40 (14.29%).

Option	Total	%	Valid %
Under 13	0	0%	0%
14-25	0	0%	0%
26-40	5	14.29%	14.29%
41-55	6	17.14%	17.14%
56-70	20	57.14%	57.14%
Over 70	4	11.43%	11.43%
Answered	35	100%	-
Not Answered	0	0%	-

3.2 Analysis by question

Question 15 on the feedback form asked for people's views on which themes will seek to maximise the positive impact of the Community Benefit Fund projects for the communities closest to them. 60% of those who answered said 'Recreation & Health'.

Option	Total	%	Valid %
Cost-of-living support	10	28.57%	40%
Education	9	25.71%	36%
Employability	13	37.14%	52%
Environment & Culture	13	37.14%	52%
Recreation & Health	15	42.86%	60%
Answered	25	71.43%	-
Not Answered	10	28.57%	-

Note: As this is a multiple-choice question, the percentages may add up to more than 100%.

Question 17 asked people to what extent do they agree or disagree with the following statements. 39.29% of those who answered 'Strongly Agreed' renewable energy has an important role in the fight against climate change, and in comparison, only 10.71% said they 'Strongly Disagree' with this.

Option	Total	%	Valid %
Strongly Agree	11	31.43%	39.29%
Agree	9	25.71%	32.14%
Neither Agree nor Disagree	5	14.29%	17.86%
Disagree	0	0%	0%
Strongly Disagree	3	8.57%	10.71%
Answered	28	80%	-
Not Answered	7	20%	-

More than 50% of people either ‘Strongly Agreed’ or ‘Agreed’ that more renewable energy generation in Wales would make Wales less reliant on imported energy and help to guarantee secure energy supplies in the future, compared to less than 40% who either ‘Disagreed’ or ‘Strongly Disagreed’.

Option	Total	%	Valid %
Strongly Agree	8	22.86%	29.63%
Agree	6	17.14%	22.22%
Neither Agree nor Disagree	3	8.57%	11.11%
Disagree	5	14.29%	18.52%
Strongly Disagree	5	14.29%	18.52%
Answered	27	77.14%	-
Not Answered	8	22.86%	-

When asked if people agreed with the statement ‘Renewable energy developments in Wales are being held back by a lack of grid infrastructure to connect them to power networks’, 32.14% of those who answered ‘Neither Agreed nor Disagree’. 25% ‘Strongly Agreed’ and 25% ‘Strongly Disagreed’ with this statement, compared to 3.57% who ‘Agreed’ and 14.29% who ‘Disagreed’ with it.

Option	Total	%	Valid %
Strongly Agree	7	20%	25%
Agree	1	2.86%	3.57%
Neither Agree nor Disagree	9	25.71%	32.14%
Disagree	4	11.43%	14.29%
Strongly Disagree	7	20%	25%
Answered	28	80%	-
Not Answered	7	20%	-

4. Open responses

4.1 Introduction

The analysis for any freeform responses received is divided into two distinct sections below, for ease of reference. The first section **H4.2** covers each of the questions as they relate to the Feedback Form, where an open response was required.

The second section, **H4.3** deals with the email responses, hard copy letters and telephone queries as one group, as, given the freeform nature of the responses and variety of issues mentioned, these did not naturally ‘mirror’ or ‘answer’ either one question or another on the more structured Feedback Form. Consequently, the variety of issues covered – and issues summaries raised – are treated as one group.

4.2. Open question responses - Feedback Form

4.2.1 Question 1: Do you have any overall comments about the preferred route corridor we have identified for the Rhiwlas Green Energy Network?

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
<p>Wooden poles better than steel pylons</p> <p>Wooden poles - sympathetic to landscape</p> <p>Already have poles nearby (considered negative) /too many in close proximity</p> <p>Refusal stated in terms of being able to put poles on land</p>	Wooden Poles	A few respondents concentrated mentioned the wooden poles specifically in their response, covering a range of issues, including a positive response about the poles being wooden and the importance of maintaining sympathy with the landscape. However, some respondents pointed out that they already had poles nearby and found this an ‘eyesore.’ One respondent stated that they would not allow the poles on their land.
<p>Logical route</p> <p>Previously proposed by SPEN- suitable alternative</p> <p>Alternative locations /suggested routes</p> <p>Easterley not Westerley side of route corridor a preference for route</p> <p>Too close to properties/villages (particular emphasis on Trefeglwys)</p>	Route & Proximity	<p>A comparison was mentioned in relation to the old Scottish Power (SPEN) route proposed in the area in the past, with the comment made that the wooden poles were preferable to metal pylons.</p> <p>Numerous comments were made about the route itself, with some comments highlighting that proposals seemed to represent a logical route, but another stating that a previous proposal by SPEN had seemed acceptable. Some respondents suggested alternatives, such as routing via Newtown and picking up the Llandinam connection, or following the A470 route to avoid any perceived disruption to the landscape and environment.</p>

Route running along the old Van railway line		<p>Additional comments were made about upgrading existing provision and following already developed corridors (road, railway tracks, existing power lines).</p> <p>Some responses commented on the fact that respondents felt the route came too close to built up areas/housing. Trefeglyws in particular was highlighted.</p>
<p>Better than SPEN previous proposals</p> <p>Similar 10 years ago [SPEN route]</p>	Comparisons & confusion with old SPEN route	<p>A couple of comments were raised about a previous SPEN route, with one mentioning how the previous route had been suitable, yet another highlighting how the previous route had been objected to, particularly by Trefeglyws residents.</p> <p>It is worth noting that the SPEN line was mentioned a few times throughout consultation responses, with some respondents assuming SPEN (and any previous consultation they may have run) and Green Gen (and/or their proposals) are the same.</p>
<p>Proposal no benefit to Wales / benefits are for England</p> <p>Proposal not suitable /generally against proposals</p> <p>Generalised concerns</p> <p>Do not think proposal is necessary /windfarms are necessary</p>	Benefit	<p>Responses for this aspect were generally negative in sentiment, with comments broadly indicating that they did not see the benefit of the proposals – this included more generic comments around being against or concerned about the proposals, or not believing that windfarms are necessary in the locality. More than one comment made the point (or heavily implied) that it seemed from the perspective of the respondents that the benefits to be drawn from the proposals were for England, as opposed to Wales.</p>
Proposal ruining landscape/outlook	Aesthetic & Outlook	<p>Many residents responding indicated concerns about the outlook, character and aesthetic of the local area being affected by the proposals and a keen sense of pride in/admiration of the local landscapes was evident from the language used (eg. “beautiful countryside, beautiful views, the landscape here is particularly outstanding”). Rural ‘beauty’ being ‘ruined’ was a key concern. These comments were sometimes linked to comments surrounding the possibilities of undergrounding to mitigate this (see ‘Undergrounding’ below).</p>
Damaging environmental factors	Environment	<p>Whilst there were supportive comments made around the proposals potentially supporting the transition to ‘green’ network – and recognition that</p>

<p>Bwlchgarred section of the A470 trunk road in the Trefeglwys-Llandiloes-Llangurig road - preservation of bluebells that grow</p> <p>Not the right solution for the climate crisis</p> <p>Supportive: transition to green and/or more local network</p>		<p>something needed to be done in relation to the climate crisis, there were general comments made that the scheme wasn't the right solution; a perception was that the scheme would be damaging environmentally. Some comments gave more specific examples of areas of concern in this category, including the importance of preserving a particular group of bluebells, feeling that habitats for wildlife may be affected (such as birds, wildfowl ponds and insects) – with deciduous trees additionally being given a mention in relation to the impact any destruction of these would have “to the varied birdlife in the area.”</p>
<p>Undergrounding at Trefeglwys</p> <p>Undergrounding (general)</p>	<p>Undergrounding</p>	<p>General comments about undergrounding the scheme (beyond the small area that has been proposed for undergrounding) were expressed – with particular mention made to Trefeglwys in particular.</p> <p>The two arguments predominantly given for undergrounding focused on mitigating the perceived damage the proposal would cause to the landscape and aesthetic of the area (also see Aesthetic and Outlook, above) but also that it would lessen the impact on communities/individuals.</p>
<p>Will result in loss of house / property value /affect house moving etc</p> <p>Damage to tourism / commercial ventures /livelihoods</p>	<p>Tourism, Livelihood, Personal Financial Loss</p>	<p>There was a very keen view that the proposals would have a disproportionate negative affect on some people's livelihoods. Tourism and leisure were emphasised in particular, but also activities involving growing and farming.</p>
<p>Detrimental to health and wellbeing</p>	<p>Health and Wellbeing</p>	<p>Minor comments were made as to the perception that the proposals would adversely affect health and wellbeing.</p>
<p>Use other methods /locations (i.e. offshore) for renewables</p>	<p>Alternative renewable(s)</p>	<p>Minor comments were made around whether alternatives could be considered – i.e. taking the project offshore, rather than onshore.</p>
<p>Not convinced/persuaded by justifications</p>	<p>Trust</p>	<p>A thread ran through some responses that indicated trust was an issue – with respondents arguing that (corporate) profit-making was a driver and justification for implementation, as opposed to climate change. Some pointed out that they felt</p>

<p>Money-making scheme</p> <p>Expensive & costly approach</p>		<p>there was a disconnect between arguments being made on climate change/protecting the environment and either the energy utilised - or perceived adverse effect on the environment - to implement the proposals.</p>
<p>Concern in terms of future connections & what this means</p> <p>Questions (rather than comments) raised</p> <p>Working collaboratively (with those affected /communities)</p>	<p>Future-focused</p>	<p>A small handful of comments were forward looking, and queried what the implementation of this scheme would mean in terms of “future proofing” and the future – one mentioned worry over the need for future connections; with others raising further questions about the scheme/the future themselves, as opposed to providing comment.</p>

4.2.2 Question 2: Are there any factors you feel have not been considered in the identification of the preferred route corridor?

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
<p>Distance of power generation from point of use</p> <p>Loss in power [due to distance generated]</p>	<p>Power Generation & Point of Use</p>	<p>Some feedback in the consultation was regarding the rationale for the power being generated a long way away from where it is intended to be used, pointing out that, assumably, power would be lost due to this.</p>
<p>Near to highly populated area (in particular Trefeglwys)</p> <p>Demand for Trefeglwys consultation /discontent re: Trefeglwys</p> <p>Other routes/ options</p> <p>Not considerate of community/people (general)</p> <p>Disruption to communities</p> <p>Desire to be left alone (communities/individuals)</p> <p>Being mindful of other (SPEN) lines/infrastructure</p>	<p>Route & Proximity</p>	<p>The consultation presented several comments regarding the proximity of the proposal to communities/more populated areas, with people feeling the suggested route was not considerate of these communities and that it would cause disruption.</p> <p>It was noted that the community in Trefeglwys was mentioned specifically in multiple instances by name in this context (also see ‘Consultation’ for further comments on Trefeglwys, below).</p> <p>There were comments and suggestions made by some parties as to alternative routes, with multiple respondents feeling there was not enough reference to, or consideration of, existing provision and connections and a point raised about the fact they believed there was not adequate explanations around what alternative routes had been considered.</p>

		<p>Some mention was also made of being mindful of the existing SPEN infrastructure currently in place in Pantygesel, Clatter and suggestion that a route which followed a proposed route “from the earlier plan” - running to the east of Bryn Wgan SY17 5QU (SN98409280) – was preferable to what was being proposed (it is thought the earlier plan mentioned is a previous proposal from SPEN; it should be noted that some consultees did not distinguish between Green Gen and SPEN, in terms of making reference to previous possible infrastructure proposals).</p>
Detrimental to outlook /visuals	Aesthetic & Outlook	<p>As with question 1 of the consultation, multiple comments were raised where concerns were flagged as to the proposal detrimentally affecting the “landscape beauty.” There was evident strength of feeling in the comments made by several parties.</p>
<p>Environmental impacts/observations</p> <p>Concern for plants/vegetation/livestock on site/land</p>	Environment	<p>Some specific areas were raised which respondents felt should be considered - for example Glyndwr's Way National Trail was mentioned as likely to be “adversely affected” and the river Wye as a Special Area for Conservation.</p> <p>A response also highlighted that conserving flora, fauna and geological or physiological features of special interest was important – but they felt “no proper regard [had] been given to the desirability” of conserving them.</p> <p>Birds were mentioned more than once as a consideration, with it being pointed out that curlews and ospreys have been seen to be nesting within and adjacent to section 2 of the preferred route corridor and that the area at SN98509300 and north to SN98509330 has more dense birdlife, with breeding redstarts and linnets.</p> <p>Some respondents made comments as to how the proposals would cause issues to livelihood – but in the context of the proposal affecting their animals (“you have not considered what effect this has on livestock”) or acres of trees being grown by some, where the implication is that the pylons and future heights would potentially become an issue.</p>

Undergrounding preferable	Undergrounding	Multiple comments were made around the preference and value of undergrounding the scheme – with at least one respondent highlighting that if the project did not “float” with “underground transmission cables” – then “it should not float at all.”
Advent of new Welsh National Park & increase of leisure travel Ruining leisure /tourism Loss of livelihood for businesses/cost of property	Tourism, Livelihood, Personal Financial Loss	The perceived adverse impact on the leisure and tourism sector in the area was apparent, with generic comments made such as the “tourism industry will be ruined,” and “several holiday park destinations will be adversely affected,” - as well as more specific comments, such as one respondent making reference to specific holiday parks en route which will be affected (Meadow Springs Holiday Park) as well as the impact likely to be had, taking into account the increase in leisure travel regarding the creation of a new Welsh National Park. Livelihood and homeowner impact was another concern mentioned – house values/effect on local property was highlighted, but also the suggestion that it wouldn’t do local businesses good, with one respondent pointing out that they felt this would have a “deleterious effect” on local business.
Contradiction of Welsh Government policy Seek support from politicians/keep communicating	Politics	A comment was made that they felt the proposals were at odds with the Welsh Government’s environmental policy, however another was quite vociferous regarding the need for local and national politicians to become more involved and, “speak up in support.”
Concern about elecromagnetic lines	Health and Wellbeing	One comment was raised regarding concern for the potential electromagnetic field that could be generated from the pylons and lines – with Cae Garreg mentioned specifically as having elevated levels of Radon from the ground already.
Tidal /offshore wind power instead/other options for renewable energy	Alternative renewable(s)	The consultation raised asks by some respondents to consider “other renewable schemes” – some of the alternatives suggested included solar panels on “applicable roofs,” hydro schemes/tidal power (mentioned more than once) and offshore windfarms.

Expressing a need for more information/felt not had information should have	Consultation	There were also comments made on Trefeglyws in the context of a consultation event not being scheduled there, with at least one resident pointing out that the lack of consultation in the village “showed disdain.” Given comments made in ‘Routes and Proximity’ in question 2, above, the relative close location of Trefeglyws next to the proposed route seemed to be a consideration for many.
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4.2.3 Question 3a: Do you have any specific comments or issues you would like to highlight as we develop our proposals for the corridor sections? [Cefn Coch (Llyn Lort Energy Park) – Carno – Trefeglwys]

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
<p>Do not want any more windfarms</p> <p>Mid-Wales disproportionately 'targeted' for wind farms/overdevelopment in mid-Wales</p> <p>Perception other areas are being 'protected' (England and Wales) from development /possibility of negative views</p>	Disproportionate Development in Locale/Wales	<p>There was a sense from some respondents that they were unhappy with the level of windfarm development in the local area, with a feeling that mid-Wales was a “disproportionate target” for such developments.</p> <p>Some questions were raised as to why other areas – within Wales – were not a consideration.</p>
<p>Want away from populated areas</p> <p>Alternative suggestions: route</p>	Route & Proximity	<p>As mentioned in other questions, there was a clear sense that running the proposed route next to populated areas was undesirable. Undergrounding was sometimes mentioned in this context, as was Trefeglyws (see ‘Undergrounding, below and ‘Lack of alignment/joined up approach’ for further reference in an alternative context regarding Trefeglwys and undergrounding).</p> <p>Three responses gave suggestions for alternative routes:</p> <ul style="list-style-type: none"> - one suggesting that the proposal should perhaps follow the road from Cefn Coch, via the Rhydd to Carno (on account of the area already having existing windfarms and an electricity station) or avoid Cwm Cra to the west (so as to link up to existing electric poles

		<p>connecting developed windfarms in the vicinity of Cefn Coch)</p> <ul style="list-style-type: none"> - another suggesting that following A470 was preferable, suggesting the route go from Clatter, Caersws, Llandinam and the “straight up to Newchapel” - another respondent suggests retaining the proposed (implied SPEN) route from the earlier plan running to the east of Bryn Wgan SY17 5QU (SN98409280) instead of the now proposed West, to avoid the impact on several residential properties and farms (including the Grade II listed Ystradfaelog) or running the route through SN98309300 and closer to the public road to Clatter due to “more dense birdlife” and to avoid damaging views and outlook.
Making best use of infrastructure - request for maximum capacity	Benefit	A single response pointed out the lack of grid infrastructure in mid Wales and asked that the line be designed to carry maximum capacity possible, so infrastructure proposed was fully utilised.
Damage to outlook	Aesthetic & Outlook	Some comments highlighted thinking that it was going to be “extremely difficult to mitigate the visual damage” and that the proposal was going to be “at the expense” of the natural beauty of the area. Some comments were also raised about the (adverse) views that would be had from properties.
Protection of environment	Environment	The area at SN98509300 and north to SN98509330 was raised by a single respondent as having more dense birdlife (including breeding redstarts and linnets).
Preference for undergrounding/critical of not undergrounding Scepticism around arguments: undergrounding	Undergrounding	<p>A preference to underground the lines is highlighted by some respondents, with Trefeglyws mentioned again specifically within this context. There is also mention that this is the Welsh Government’s “stated preference” – and therefore it is questioned why this is therefore being rejected on the grounds of cost.</p> <p>A challenge is made by a respondent as to the arguments presented by Green Gen around rejecting installation of a high voltage DC line underground, based on cost. They highlight that they recognise that the converters/inverters at either end of the line are costly but feel these are justified to protect the environment.</p>

Negative impact to livelihood/property value/business/farming	Tourism, Livelihood, loss of personal monetary value	A recurring theme in other questions, the potential negative impact on livelihoods and property is raised. A single business went into detail about the impact of having the “double poles” on the land, noting that they had little flexibility in terms of choice of fields to harvest mechanically (because of size and topography) and therefore the potential to produce sufficient winter fodder from existing acreage would be lost. The impact on tourism for Trefeglyws is also mentioned.
Negative impact on health & wellbeing	Health and Wellbeing	A single respondent felt there would be an “impact” and “detrimental” effect to their health and wellbeing if pylons were put on their land.
Feels being exploited /profiteering Perceived as not as 'important' as other areas	Exploitation	A mention is made that the beauty of the area is being compromised to make “Bute Energy” rich. Another said their home was “not available for exploitation.” One mention was made around mid-Wales not being “as important” as others (the implication being it is alright to build in mid-Wales, to ‘protect’ other areas).
Refusal to grant permission(s) to access	Access	A single respondent made reference to preventing access to their land.
Issue with how area/site/home has been referred to/language used Greater clarity in materials	Consultation	One comment was made regarding the consultee finding maps confusing – asking instead for, “3d images of what this would look like in these areas.” A comment was made regarding what a respondent perceived to be insensitive language used to them during consultation – their home being referred to as a ‘pinch point.’
Perception not in line with Govt policy Not in line with community efforts on supporting the environment Counter-productive to green agenda to industrialise the countryside	Lack of alignment/joined up approach	One consultee from Trefeglyws highlighted that their “close” was already on solar power and highlighted they were already trying to help the environment in this way – they queried why – given this – they were not being “supported.” It was also raised that the Welsh Government is promoting solar panels, “as the energy source we should all be looking to use going forward” – the implication being that the proposal was not joined up with wider thinking.

		A respondent mentioned that “industrialising” the countryside to achieve “green energy” seemed counterproductive.
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4.2.4 Question 3b: Do you have any specific comments or issues you would like to highlight as we develop our proposals for the corridor sections? [Trefeglwys – Llanidloes – Llangurig (Rhiwlas Energy Park)]

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
Want away from populated areas Section 6 too generalised	Route & Proximity	Concerns raised that the proximity of the overhead line could negatively effect property values and existing commercial operations.
Bad for the community	Benefit	Concerns about the route optioneering process and changes to the corridor creating divisions among communities.
Concerns regarding outlook/views	Outlook & Aesthetic	Impact on the Trannon Valley raised in particular, as was the suggestion that overhead lines were an inappropriate technology to use in the local landscape context.
Environmental considerations	Environment	Perception that the embedded carbon of the net zero transition would not be offset over the lifetime of projects. Heritage and noise concerns. Suggestion that undergrounding would reduce environmental impacts.
Undergrounding request	Undergrounding	Several requests noting that they would support the undergrounding of cables.
Affecting leisure Affect (P&N) on business/commercial/property Necessary high frequency radio monitoring affected	Tourism, Livelihood, loss of personal monetary value	Suggestion to avoid routing to follow the A470 and comments noting the corridor passes over local campsites. Suggested that the presence of wood poles would deter holiday tourism to the area.
Perceived potential health risk Affect to health and wellbeing	Health and Wellbeing	Respondent noted that presence of a wood pole on their land would be detrimental to their health and wellbeing.
Request/consideration of alternative (renewables)	Alternative renewable(s)	Respondent suggested that rooftop solar panels were an alternative to utility scale schemes.
Only for Bute/big business benefit Lack of trust in Bute	Trust	Scepticism that commitments would not be adhered to and of the profit motive of development.

Insufficient road access Refusal to access land	Access	Comment noted 'there is insufficient road to access the area'.
Request that locals are talked to/consulted/considered Insensitive approach (consultation) Different way of producing the data	Consultation	A number of respondents noted the need for Bute to talk to local stakeholders and present information sensitively.
Not wanted locally (general) Wales being 'put upon'	Disproportionate Development in Locale/Wales	Opposition to renewable energy projects i.e. wind in Wales more generally and the cumulative impact of projects.

4.2.5 Question 3c: Do you have any specific comments or issues you would like to highlight as we develop our proposals for the corridor sections? [Rhiwlas Energy Park – Banc Du Energy Park]

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
Don't want more windfarms/area too saturated with windfarms	Disproportionate Development in Locale/Wales	Five respondents said they did not want wind farms or associated developments to be built in the area.
Does not feel Wales/Welsh communities will benefit	Benefit	One respondent suggested that local communities should benefit from lower electricity prices.
Environmental impact/considerations Ruining the countryside	Environment	Concerns raised about the impacts on wildlife and peat bogs and that there were alternative ways to produce green energy.
Preference to underground	Undergrounding	It was suggested that undergrounding should be used to minimise the impact on Trefeglwyllys.
Preference for offshore not onshore	Alternative renewable(s)	Two respondents suggested that the lines could be put out at sea as an alternative.
Feels exploiting/profitteering Inferring worried that there will be a switch	Trust	Scepticism that commitments would not be adhered to and of the profit motive of development.

from wooden poles to steel pylons		
Want to be kept up to date	Consultation	One respondent noted they would like to be updated with more information on the preferred routing when available to understand its proximity to their property.
Perception not in line with Government policy Not in line with community efforts to support the environment	Lack of alignment/joined up approach	Respondents suggested that rooftop solar panels were an alternative to utility scale schemes.

4.2.6 Question 5: What would you like to see the Community Benefit Fund invested in within your area and are there any groups, projects or initiatives who you think we should speak to?

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
Outward Bound Sports pitches/teams Rugby Club	Sport	'Outward Bound', 'Rugby Club' and 'sponsorship for local sports teams; Llanidloes sport partnerships; Llanidloes sports centre'.
Play features/facilities for youth/youth groups Scouts; Brownies (Llanidloes) Schools & school repairs Financial assistance those going on to HE	Youth & child focused, (inc employment opportunity)	'Youth Groups' and 'Llanidloes Scouts, Llanidloes Brownies'. That schools should be a significant beneficiary from the Community Fund owing to their catchment and need for investment. One respondent also suggested 'financial assistance for local residents progressing to Higher Education'.
Support of/for local community centres OR new community spaces Women's Institute (WI) (Llanidloes) Inner Wheel (Llanidloes) Rotary Club (Llanidloes)	Community focused (inc. local renewable schemes)	'Clatter Community Centre', 'Llanidloes Women's Institute (WI), Inner Wheel Futures Project, food bank and Rotary Club' all noted. Support was also recognised for local renewables schemes although no specific examples of existing organisations to support were cited.

Llanidloes Futures project Communal food security / community cohesion Llanidloes food bank Smaller renewable local schemes supported Community renewable projects		
(Positive) environmental schemes /rewilding Repairing paths/gates/bridges signposts etc	Environment	Rewilding and Public Rights of Way (PRoWs) improvements in the immediate vicinity of the corridor were suggested, as was utilising the Community Benefit Fund for further environmental measures to mitigate effects beyond the required mitigation more generally.
Install electric charging points Subsidise electric charge points	EV-related	Installing and subsidising electric charging points. One respondent noted that this could incentivise visitors to the area.
Bus subsidies Subsidise electric charge points Wholesale/subsidised energy for those within (5 mile radius) Compensation for losses (due to site creation) eg. privacy; reduction of house value	Subsidies & compensation	Also note one request to subsidise EV, covered in EV-related Tier 1 comments, above.
Town Council (various) Request to allocate money to a single entity (not LA) for people to bid	Council	Llanidloes Town Council noted specifically. One respondent suggest that 'rather than delegate the distribution of community funds to local authorities I think there would be better benefit to establishing a single administrative entity where organisations can apply for project funding'.
Unspecified i.e. general enhancements	General	Mixed, general comments. Conflicting sentiments expressed among respondents both either in opposition to the scheme and wind farms and in favour of speeding up their delivery to tackle the climate crisis.

Refusal to accept (concept/scheme) General comments about speeding the project up (P)		
Perception of bribery /control by Bute Sceptical of value to the community /perceived poor previous experience Investing in meeting space (for consultation) in Trefeglyws /negative feedback re: lack of consultation to date in Trefeglyws	Trust	Opposition to the scheme and Bute as a developer expressed through scepticism or rejection of the value of the fund to communities.
Crown and Regeneration Project (CARP) Retrofit project Health and Social Care	Other ideas, not elsewhere classified	'Crown and Anchor Regeneration Project' noted by one respondent.

4.3 Open question responses - email responses, hard copy letters and telephone queries

Tier 2 Topic	Tier 1 Theme	Summary of matters raised
Concerns regarding cumulative [negative] impact on existing SPEN assets/grouped consideration (N) More information regarding impacts on existing SPM/Energy networks Infrastructure/mitigation (Neu)	Current SPEN route impact	Note that issues raised regarding current SPEN infrastructure assets are also noted under 'Consultation', due to the requests for more information to be given.
Not supportive of overhead line (N)	Benefit	Respondents noted concerns that an overhead 132kV wood pole transmission line would devalue their land without bringing benefits.

Feel will damage the aesthetic (general) N	Aesthetic & Outlook	One respondent suggested that wood poles would spoil and devalue their land.
<p>Ruining nature /destroying countryside (N)</p> <p>Concern for historical assets (Neu)</p> <p>Expectation stage 1 assessment of settings of all designated historic assets (EIA) (Neu)</p> <p>Need to report hazardous pipeline installation/modification or introduction of hazardous substances (Neu)</p> <p>Avoidance of any adverse impact on current infrastructure assets - planned/current (N)</p> <p>Arguments for DC line on aesthetic &/or environmental grounds (Neu/N)</p>	Environment	<p>Complaint that the project was ‘industrialising the countryside’.</p> <p>One respondent provided detailed comments on the corridor optioneering noting that while the search areas are close to the boundaries of two registered historic landscapes, they did not enter these areas. However, ‘impact of the proposed development on their settings will need considered and this should be carried out accordance with the Welsh Government guidance given in the document The Setting of Historic Assets in Wales’. The same respondent also noted that ‘undesigned and unrecorded historic assets will also need to be considered in the EIA and therefore the Clwyd-Powys Archaeological Trust, the archaeological advisors to Powys County Council, should be consulted’ as part of the Environmental Impact Assessment (EIA) methodology.</p> <p>Comments received from the Health and Safety Executive (HSE) on hazardous pipeline installation.</p> <p>Issues raised regarding current SPEN infrastructure assets. Request made for further investigation and costing of DC connection and undergrounding options.</p>
<p>Undergrounding preferred / criticism of non-undergrounding (N)</p> <p>AC/DC positive arguments/justifications for undergrounding (Neu)</p>	Undergrounding	Typical sentiment expressed by several respondents is well illustrated in the following comment ‘Green Gen Cymru must give appropriate consideration to the use of HVDC underground electricity transmission to ensure acceptance of these proposals’.
<p>Damage to leisure opportunities (N)</p> <p>Damage to Livelihood /assets /commercial concerns (N)</p>	Tourism, Livelihood, loss of personal monetary value	Concerns about the impact of the proposals on existing commercial operations i.e. camp sites and on the completion of residential property sales.

Ability for other energy lines to connect (P) / Not able to have other local lines connect (N)	Alternative renewable(s)	Complaints about the lack of existing connection opportunities for local projects and businesses. Expressed either in support or in opposition of the scheme.
In favour of Wind Farm Development (P)	Supportive – Wind Farms	One respondent commented ‘in favour of the Wind Farm Development as proposed by Bute Energy’.
Scepticism re: arguments climate change mission (N) Scepticism motives - government funding (N) Scepticism: concerned only with profit/making money Scepticism: bribes / 'buying off' Scepticism: deliberately trying to obscure facts	Trust	One respondent commented that seeking to meet government net zero delivery dates was ‘an interesting psychological approach’. A more general negative sentiment against Bute and the development was expressed by a number of respondents.
Timing at Christmas - negative (N) Lack of Trefeglwys event (N) Desire for current operators working together collaboratively (P) More information regarding impacts on existing SPM/Energy networks Infrastructure/mitigation (Neu) Concern regarding no previous engagement - statutory undertakers (N) Consultation process concerns / lack of approach (N)	Consultation	Suggested by five respondents either that 56 days was an insufficient time for them to respond to the consultation, or that they had not been made aware of the consultation. One respondent said an event should have been held in Trefeglwys. Recommendation from respondents for developers to agree a coordinated approach to local consultations, including providing ‘plans showing the proposed layout in relation to the existing SPM assets’. Suggested that visualisations should include scale in relation to other structures such as buildings.

Denying permission to access land (N)	Access	Three respondents explicitly noted that they would refuse and object to any access being given onto their land.
At odds with Govt policy (Govt preference on undergrounding not overground) Lack of opportunity for community ownership Holford Rules as outdated guidance for line (50's) given new technologies (N) Comments utilities	Lack of alignment/joined up approach	Complaints about the lack of connection opportunities for local projects and businesses. Request made for further investigation of undergrounding options. Noted that consideration of the Holford Rules in the 'Green Gen Cymru Routeing and Consultation Document' was in the context and assumptions of 1959 technology options around undergrounding of electricity transmission and that 'since the 1990s the development of cable technology has accelerated especially in the area of HVDC transmission'.

4. Conclusion

The outcome of consultation findings will be considered alongside further technical assessments, such as detailed environmental surveys and other baseline information. This cumulative data will allow Green GEN Cymru to refine the OHL route, as well as fully assess the environmental effects of that route, as part of the application for planning consent.

ISSUES RAISED IN CONSULTATION RESPONSES AND RESPONSES FROM APPLICANT

This analysis details all open-ended responses received from consultees. All responses have been analysed and organised into key topics by the Project team so that a response could be provided by Green Gen Cymru. As part of the analysis undertaken, all issues raised have been given equal weight and consideration. The tables below outline the key topics raised in the feedback and a summary of the matters raised, along with a response from the Project.

1. Visual Impact

Topic	Summary of matters raised	Green GEN Cymru's response
<p>Already have poles nearby (considered negative) / too many in close proximity</p>	<p>Respondents pointed out that they already had poles nearby and found this an 'eyesore.'</p>	<p>As we develop our projects, we consider the visual impacts of the overhead lines and how these can be reduced through careful routing and siting, for example seeking to avoid important designations and proximity to towns and villages, and potential for effects to be mitigated.</p> <p>We also consider other environmental and technical considerations including landscape designations, ecology and ornithology, hydrology and peat, cultural heritage, ancient woodland, forestry, agricultural land and other land uses.</p> <p>Green GEN Cymru is committed to, and has been following, the guidance set out in the Holford Rules and associated notes of clarification for routing overhead lines, the key principles of which include avoiding prominent ridges and skylines; following broad wooded valleys; avoiding settlements and residential properties; and maximising opportunities to make use of a background of landform or other features such as woodlands which can be viewed behind the proposed new infrastructure (known as 'back clothing')</p> <p>The interaction with existing infrastructure has been an important consideration. For section 1 of the route, the route now also hugs the western extent of the corridor between Maesypanyd and the A470 at Oerffrwd. This is driven by needing to locate the most practical and least impacting crossing point of the road and mainline railway. It also avoids the more sensitive vegetation to the north of the Scottish Power Energy Networks (SPEN) route and maintains appropriate separation from the SPEN route itself.</p>

<p>Proposal ruining the aesthetic of the landscape and outlook</p>	<p>Indicated concerns about the outlook, character and aesthetic of the local area being affected by the proposals.</p>	<p>The objective of the routing process to date has been to seek to avoid or reduce effects on the environment, including people who live, work, enjoy and visit the local area.</p> <p>Green GEN Cymru will seek to continue to avoid or reduce effects on the environment, such as landscape and visual effects, effects on biodiversity and cultural heritage, during the design of the Project.</p> <p>Effects associated with the construction and operation of the final design of the Project will be assessed as part of the Environmental Impact Assessment (EIA) process and additional measures and controls will be proposed to further reduce effects.</p> <p>The findings of the EIA will be presented within the Environmental Statement (ES) which will be submitted alongside the Development of National Significance (DNS) application.</p>
<p>Undergrounding as mitigation</p>	<p>Comments surrounding the possibilities of undergrounding to mitigate visual impact.</p>	<p>High voltage, high-capacity overhead lines are the proven economic, efficient, and reliable choice for the bulk movement of electricity throughout the world.</p> <p>We will consider undergrounding a 132kV overhead line, or section of that line, in particular circumstances where no suitable route for an overhead line can be identified because of environmental, technical or engineering constraints.</p> <p>Having been granted an Independent Distribution Network Operator License by Ofgem, Green GEN Cymru are required to operate in accordance with the 1989 Electricity Act to develop and maintain an efficient, coordinated and economical system of electricity distribution.</p> <p>Traditional underground cable trenching methods are typically between 6 and 10 times more expensive than overhead lines. These additional costs are made up of additional construction and material costs required for underground cables. Green GEN Cymru notes that the development of new cable ploughing techniques may change this and are working to determine the cost and feasibility of this method.</p>

2. Routing, Siting & Technology

Topic	Summary of matters raised	Green GEN Cymru's response
<p>Too close to properties / villages (particular emphasis on Trefeglwys)</p>	<p>Responses commented on the fact that respondents felt the route came too close to built up areas/housing. Trefeglwys in particular was highlighted.</p>	<p>Green GEN Cymru is committed to, and has been following, the guidance set out in the Holford Rules and associated notes of clarification for routing overhead lines, the key principles of which include avoiding prominent ridges and skylines; following broad wooded valleys; avoiding settlements and residential properties; and maximising opportunities to make use of a background of landform or other features such as woodlands which can be viewed behind the proposed new infrastructure (known as 'back clothing') .</p> <p>Green GEN Cymru acknowledges that a number of responses to the consultation identified locations where respondents felt that an overhead line would be unacceptable to them. This feedback has been taken into consideration and the proposals have been updated to include revising the route eastwards from the crossing of the B4569 towards the bottom of the valley and the Afon Cerist to minimise the impact on Trefeglwys village.</p>
<p>Undergrounding at Trefeglwys</p>	<p>General comments about undergrounding the scheme (beyond the small area that has been proposed for undergrounding) were expressed – with particular mention made to Trefeglwys that it would lessen the impact on communities/individuals.</p>	<p>The landscape studies undertaken to date to initially inform the preferred corridor and later the route alignment conclude that:</p> <ul style="list-style-type: none"> • The topography and woodland cover offer potential for backgrounding and screening (particularly of views from Trefeglwys village); and • There are no landscape designations. <p>There is limited justification in terms of landscape and visual effects that would weigh sufficiently in favour of undergrounding in this section.</p> <p>Generally speaking, the construction of an underground cable (either open cut or other trenchless techniques) is more damaging and results in a greater likelihood of environmental effects (for example in terms of noise, contamination and flooding). Research also indicates that the carbon emissions associated with overhead lines would be less than an underground cable.</p>

		<p>The area in and around Trefeglwys is one of “Medium to high risk flood zones” due to the Afon Trannon and Afon Cerist. Undergrounding in this area would therefore result in higher risks during construction and a higher risk that the proposed grid connection could exacerbate flood risk during operation. The preferred route seeks to minimise the siting of infrastructure within areas at higher risk from flooding.</p> <p>(See also response to ‘Undergrounding as mitigation’ above.)</p>
<p>Consideration of alternatives</p>	<p>Comments and suggestions made by some parties as to alternative routes, with respondents feeling there was not enough reference to, or consideration of, existing provision and connections and a point raised about the fact they believed there were not adequate explanations around what alternative routes had been considered.</p>	<p>The methodology for the routing process undertaken to date is set out within the Routing and Consultation Document which remains available on the Project website.</p> <p>The methodology reflects established guidance for routing of overhead lines known as the Holford Rules (and associated notes) which guide overhead line development by seeking to avoid 'areas of highest amenity value' such as internationally and nationally designated natural and cultural areas.</p> <p>The routing process was undertaken by independent environmental consultants with extensive experience in routing overhead lines reflecting the Holford Rules.</p> <p>The work undertaken to date has, in the absence of access to private land, necessarily utilised desk-based information supplemented by extensive fieldwork by landscape specialists utilising publicly accessible areas within the local area.</p> <p>The environmentally led routing work identified and appraised a number of 200m wide route options. At this point Green GEN Cymru felt this was the appropriate time to engage stakeholders including local communities as prior to this time there was insufficient information to ensure an informed and meaningful consultation.</p> <p>The feedback gathered during the consultation process provided more location specific useful information. This included previously unavailable data, such as (but not limited to) comments from people looking to connect local energy projects to the new grid line, comments about proposed extensions to a caravan park and concerns around potential effects on previously unknown land</p>

		<p>drainage assets. This has been reviewed by the Project team to inform a number of modifications to the Preferred Route. This information, supplemented by field-based surveys (subject to access being granted) will inform the siting/location of wood poles and associated infrastructure. Further detailed consideration of wood pole locations and overhead line alignment will take place and there will be further opportunities for landowners, the public and other stakeholders to have their say on our proposals through two further rounds of consultation on the Project. The first will be consultation on a proposed draft alignment in 2024 and following this, a round of statutory consultation on the detailed Project design in 2025.</p>
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3. Generalised Concerns and Opposition

Topic	Summary of matters raised	Green GEN Cymru's response
Proposal no benefit to Wales / benefits are for England	That it seemed from the perspective of the respondents that the benefits to be drawn from the proposals were for England, as opposed to Wales.	<p>By contributing to a more resilient electricity network and easing pressure on the existing local grid, Green GEN Cymru's new network will support businesses, help to create jobs and stimulate economic growth and enable the roll out of green heating and electric vehicles in rural communities.</p> <p>We are proudly a Welsh company, and we are committed to investing in Wales and supporting the Welsh economy by directly providing opportunities to the Welsh supply chain wherever possible.</p>
Do not think proposals are necessary / windfarms are necessary	Responses for this aspect were generally negative in sentiment, with comments broadly indicating that they did not see the benefit of the proposals – this included more generic comments around being against or concerned about the proposals, or not believing that	<p>The climate emergency is a threat to our planet and our communities. As a result, the Welsh and UK governments have set legally binding targets to reach net zero by 2050, encouraging people to act now, to ensure the future is protected.</p> <p>For Wales to meet the Welsh Government's target of 100 per cent of its electricity needs from renewable sources by 2035, the country will need to move quickly to bring forward new renewable energy projects and supporting infrastructure, to ensure a more sustainable, improved and secure energy grid.</p> <p>Paragraph 5.7.7. of Planning Policy Wales (11th Edition) (PPW11) states that the benefits of renewable and low carbon energy, as part of the overall commitment to</p>

	<p>windfarms are necessary in the locality.</p>	<p>tackling the climate emergency and increasing energy security, which are of paramount importance.</p> <p>The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change.</p> <p>The planning system should [amongst other criteria]:</p> <ul style="list-style-type: none"> • Integrate development with the provision of additional electricity grid network infrastructure; • optimise energy storage; • facilitate the integration of sustainable building design principles in new development; • optimise the location of new developments to allow for efficient use of resources; • maximise renewable and low carbon energy generation; • maximise the use of local energy sources, such as heat networks; • minimise the carbon impact of other energy generation; and • move away from the extraction of energy minerals, the burning of which is carbon intensive. <p>PPW11 Paragraph 5.7.8 states that “an effective electricity grid network is required to fulfil the Welsh Government’s renewable and low carbon ambitions. An integrated approach should be adopted towards planning for energy developments and additional electricity grid network infrastructure. In certain circumstances, additional electricity grid network infrastructure will be needed to support the Pre-Assesses Areas in Future Wales, but also new energy generating developments more generally.”</p>
<p>Personal financial loss</p>	<p>View that the proposals would have a disproportionate negative effect on some people’s livelihoods. Will result in loss of house / property value / affect house moving etc.</p>	<p>Wood poles are used across the UK in areas of high amenity value where people work and visit, and we are confident that with careful routeing we can reduce the potential impacts.</p> <p>Throughout the routeing process to date, we have sought to reduce the potential for effects on views experienced by tourists and visual amenity has been considered, where possible, on balance with other environmental constraints. Views from tourism and recreation sites and routes is one of the landscape and visual appraisal criteria used to inform the selection of the Preferred</p>

	<p>Tourism and leisure were emphasised in particular, but also activities involving growing and farming.</p>	<p>Route. This information is presented in the Routeing and Consultation Document which remains available on the Project website.</p> <p>Green GEN Cymru will continue to take into account the visibility from tourism and recreation sites and routes during the detailed design and assessment stages.</p> <p>The impact of the Project on the landscape will continue to be assessed in more detail in work to develop the proposals, including identifying locations for wood poles and other infrastructure required for the connection. Further assessment will be undertaken, taking into account feedback received in the second round of non-statutory consultation, and this will be presented at the statutory consultation that will take place before the Project Development of National Significance (DNS) application is submitted.</p>
<p>Consideration of alternative renewable technology options</p>	<p>Suggested that rooftop solar panels or offshore wind were alternatives to onshore utility scale schemes.</p>	<p>According to the ‘Future Energy Grids for Wales’ report, “Wales’ electricity demand may almost triple by 2050”.</p> <p>There are already grid capacity issues across much of mid Wales that are currently hindering the ability for businesses to expand and the rollout of technologies such as electric vehicles and greener heating sources. For Wales to decarbonise and become less reliant on foreign energy sources, regardless of what renewable energy sources are used, more grid capacity will be needed in the future.</p>
<p>Disproportionate Development in locale / Wales</p>	<p>Opposition to renewable energy projects i.e. wind in Wales more generally and the cumulative impact of projects.</p>	<p>The climate emergency is a threat to our planet and our communities. As a result, the Welsh and UK governments have set legally binding targets to reach net zero by 2050, encouraging people to act now, to ensure the future is protected.</p> <p>For Wales to meet the Welsh Government’s target of 100 per cent of its electricity needs from renewable sources by 2035, the country will need to move quickly to bring forward new renewable energy projects and supporting infrastructure, to ensure a more sustainable, improved and secure energy grid.</p> <p>Green GEN Cymru is proudly a Welsh company, and we are committed to investing in Wales and supporting the Welsh economy by directly providing opportunities to the Welsh supply chain wherever possible. By contributing to a more resilient electricity network and easing pressure on the existing local grid, Green GEN Cymru’s new network will support businesses, help to create jobs and stimulate economic growth and enable the roll out of green heating and electric vehicles in rural communities.</p>

		As part of the Environmental Impact Assessment (EIA) process we will also have to assess the potential for any significant detrimental impacts of the project on local communities and the environment and propose appropriate mitigation. This includes the consideration of any cumulative effects with other existing or approved projects in planning.
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4. Green GEN Cymru

Topic	Summary of matters raised	Green GEN Cymru's response
Not trusting of justifications that the project was not just a money-making scheme	Respondents argue that (corporate) profit-making was a driver and justification for implementation, as opposed to climate change.	Green GEN Cymru are a proud Welsh company and are committed to investing in Wales to unlock its energy potential. As of July 2024, Green GEN Cymru have been granted an Independent Distribution License from Ofgem. This means Green GEN Cymru are a legally separate and regulated company whose operations and business plans must remain compliant with Ofgem's policies.

5. Consultation

Topic	Summary of matters raised	Green GEN Cymru's response
Request for a Trefeglwys consultation	Comments made on Trefeglyws in the context of a consultation event not being scheduled there.	We were unable to secure a suitable date to hold an event in Trefeglwys for our Stage One consultation. However, we have committed to ensuring that an event is held in Trefeglwys for the Stage Two consultation, taking place on Tuesday 19 November 2024.
Length of consultation	Suggested that 56 days was insufficient time to	The industry standard for this stage of early engagement is usually six weeks or 42 days. This consultation was extended by a further 14 days to provide additional time

	respond to the consultation, or that they had not been made aware of the consultation.	to accommodate that this ran over the Xmas festive period. All residents within 1km of the proposed route corridor were sent an information leaflet informing them of the consultation, there was local media coverage, local councillors and Community Councils were told about it in advance, and it was publicised on social media. Information was also included on the Rhiwlas GEN website which was publicised via the means listed above and where people could also submit their response to the consultation electronically at any time before the deadline.
Visualisations	Suggested that visualisations should include scale in relation to other structures such as buildings.	The Stage Two consultation will include a 3D digital model available to view at the in-person information events that will allow people to see what the draft route alignment will look like from any location along the route corridor.

6. Environmental Impact

Topic	Summary of matters raised	Green GEN Cymru's response
Impact on environmental designations	Some specific areas were raised which respondents felt should be considered - for example Glyndwr's Way National Trail was mentioned as likely to be "adversely affected" and the river Wye as a Special Area for Conservation.	As part of our ongoing technical surveys, we will be carrying out a Landscape and Visual Impact Assessment, which is a technique used to assess the effects of change on the landscape. This assessment will be used to help develop any proposed changes as well as assess their effects, so that negative landscape effects are avoided, reduced or offset. Consent will not be granted if it is felt that the effect is too impactful on the local landscape.
Carbon	Perception that the embedded carbon of the net zero transition would not be offset over the lifetime of projects.	The development of a more resilient electricity transmission grid in the area will help to support more renewable energy projects, thereby helping to reduce the amount of carbon emitted. Wood poles are made from a plentiful and renewable resource grown in managed forests. Growing trees produces oxygen and when converted into a product, wood stores carbon. Used poles are also recyclable in a variety of applications.

Wildlife	Concerns raised about the impact on wildlife.	<p>As part of the ongoing routing and design process, we have taken biodiversity interests into account, seeking to avoid important or sensitive habitats and known wildlife sites, including designated areas. Field surveys will collect further baseline data on habitats and protected species, including bats and birds. We will use this data to inform and help develop the design of the Project to reduce effects on biodiversity and assess how the Project may impact on key species. We will also use the data to identify and implement measures to reduce potential impacts, including those arising from bird collisions with the lines.</p> <p>Green GEN Cymru will also consider opportunities to ensure the proposals contribute to a net biodiversity benefit in line with National Policy and further details on this will be available as the Project develops. A full detailed Environmental Impact Assessment (EIA) will also be carried out after which Green GEN Cymru will hold a statutory consultation on this and the proposed application so that stakeholders can give us their views on the detailed route alignment.</p>
Peat bogs	Concerns raised about the impacts on peat bogs.	<p>Prior to any wood poles being installed or any section being used for undergrounding, surveys will take place as part of the Environmental Impact Assessment (EIA) process to minimize disturbance of any areas of peatland. A peat management plan will also be prepared as part of the DNS application documents to detail how measures will be put in place to avoid, reduce or offset effects on peat.</p>

1. Health and Wellbeing

Topic	Summary of matters raised	Green GEN Cymru's response
Concern about electromagnetic lines	Concern for the potential electromagnetic field that could be generated.	<p>Electric and magnetic fields (EMFs) are produced whenever electricity is used or transmitted.</p> <p>Background EMFs are present in most homes. They are produced by household wiring, electrical appliances, low-voltage distribution cables that carry electricity along streets and by high voltage power lines and substations.</p> <p>Green GEN Cymru will develop our networks in accordance with advice published by authoritative and independent scientific organisations, such as the World Health Organization (WHO) and the UK Health Security Agency (UKHSA) and will comply with these guidelines.</p>

		A vast amount of independent research has been undertaken into the possibility of health effects, without establishing any risks at the levels we are proposing.
Health and wellbeing	Comments were made as to the perception that the proposals would adversely affect health and wellbeing.	<p>Green GEN Cymru will develop our networks in accordance with advice published by authoritative and independent scientific organisations, such as the World Health Organization (WHO) and the UK Health Security Agency (UKHSA) and will comply with these guidelines.</p> <p>A vast amount of independent research has been undertaken into the possibility of health effects, without establishing any risks at the levels we are proposing.</p>

NEXT STEPS

All feedback received as part of the non-statutory consultation has been carefully considered by the Project team. The feedback will be used alongside environmental and technical assessments to further refine the OHL route and fully assess the environmental effects of that route as part of the application for planning consent in 2025.

Further non-statutory pre-application public consultation will be held in late 2024, to update people on the project and hear their views on more detailed proposals. The local community and other stakeholders will be consulted and have an opportunity to review and comment.

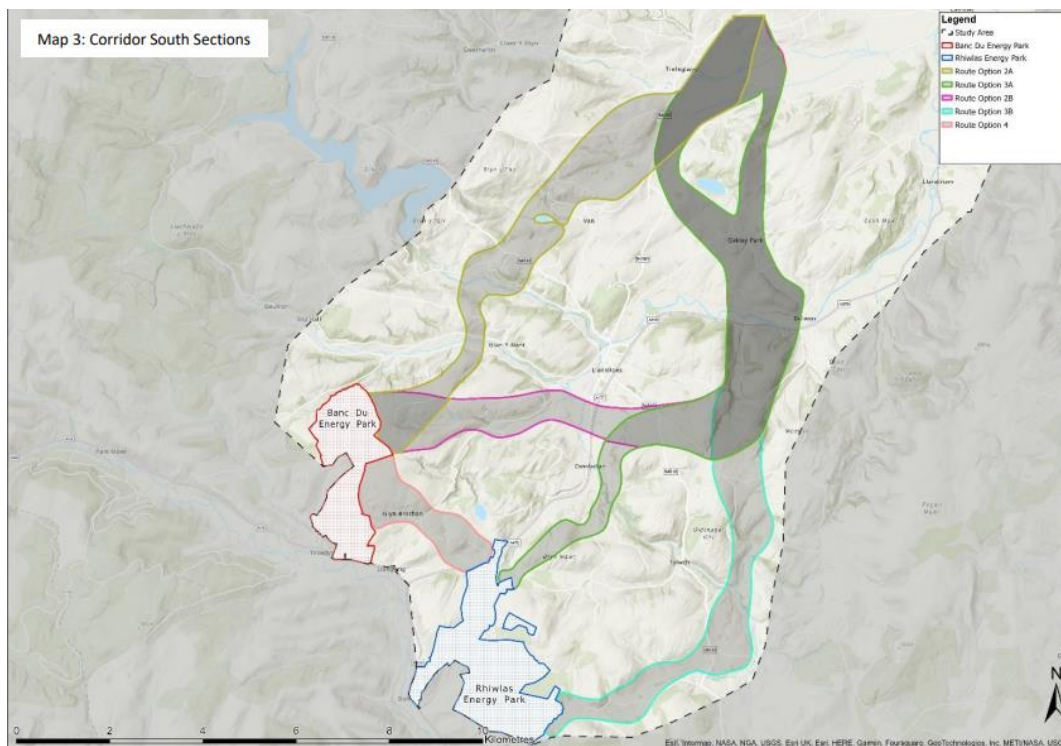
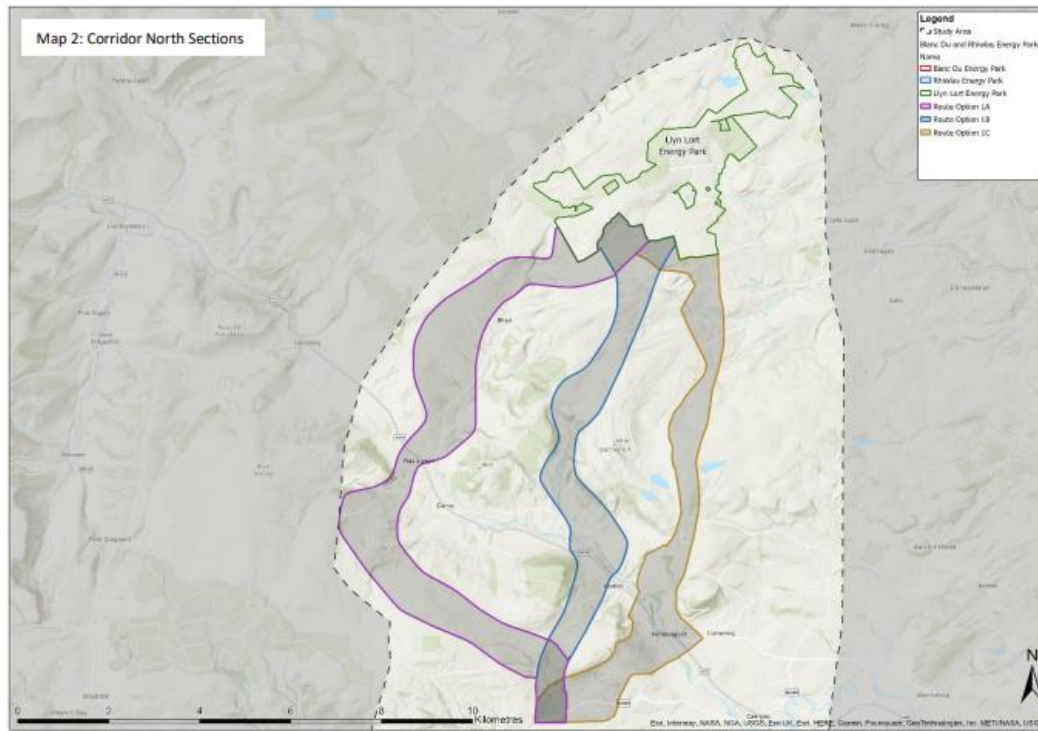
The application, to be submitted as a Development of National Significance (DNS) to Planning and Environment Decisions Wales (PEDW), is anticipated to happen in 2025. A decision on the application will then be made by Welsh Government Ministers.

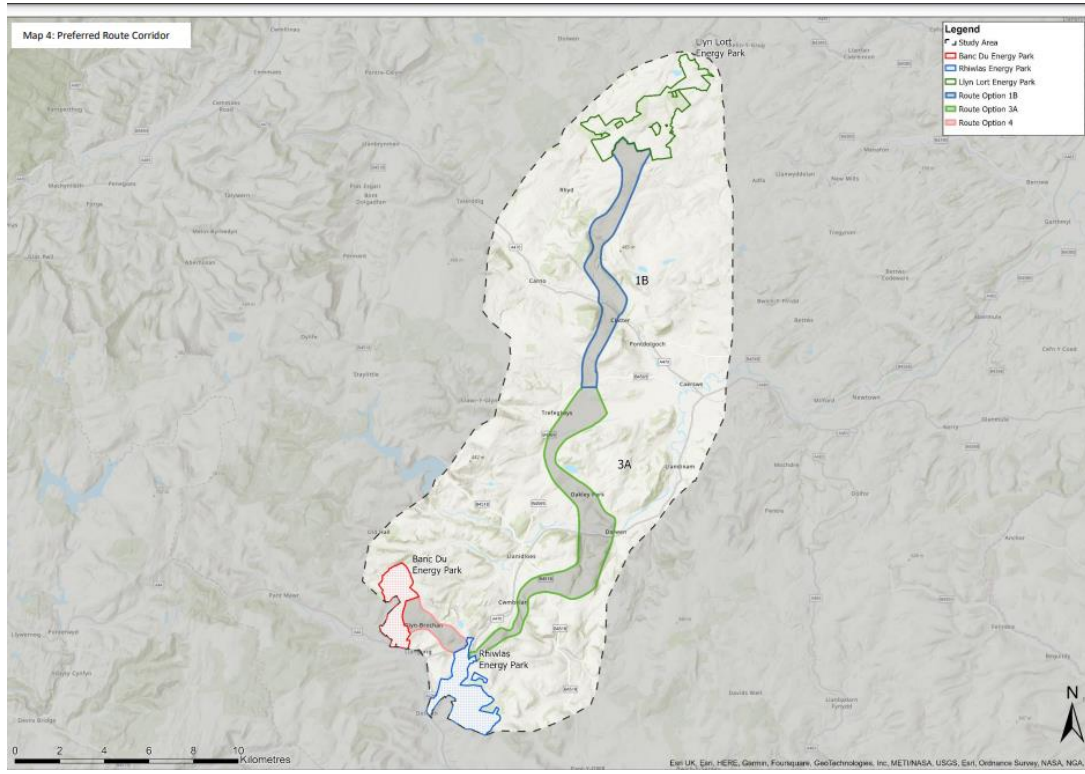
The Project team will continue to engage with stakeholders outside of the formal phases of consultation.

The Project team will remain contactable on info@rhiwlasGEN.wales for any enquiries relating to the Project. The Project website will be updated in line with any developments. Should consent be granted for the Project, the Project team will continue to engage with stakeholders throughout construction.

APPENDIX

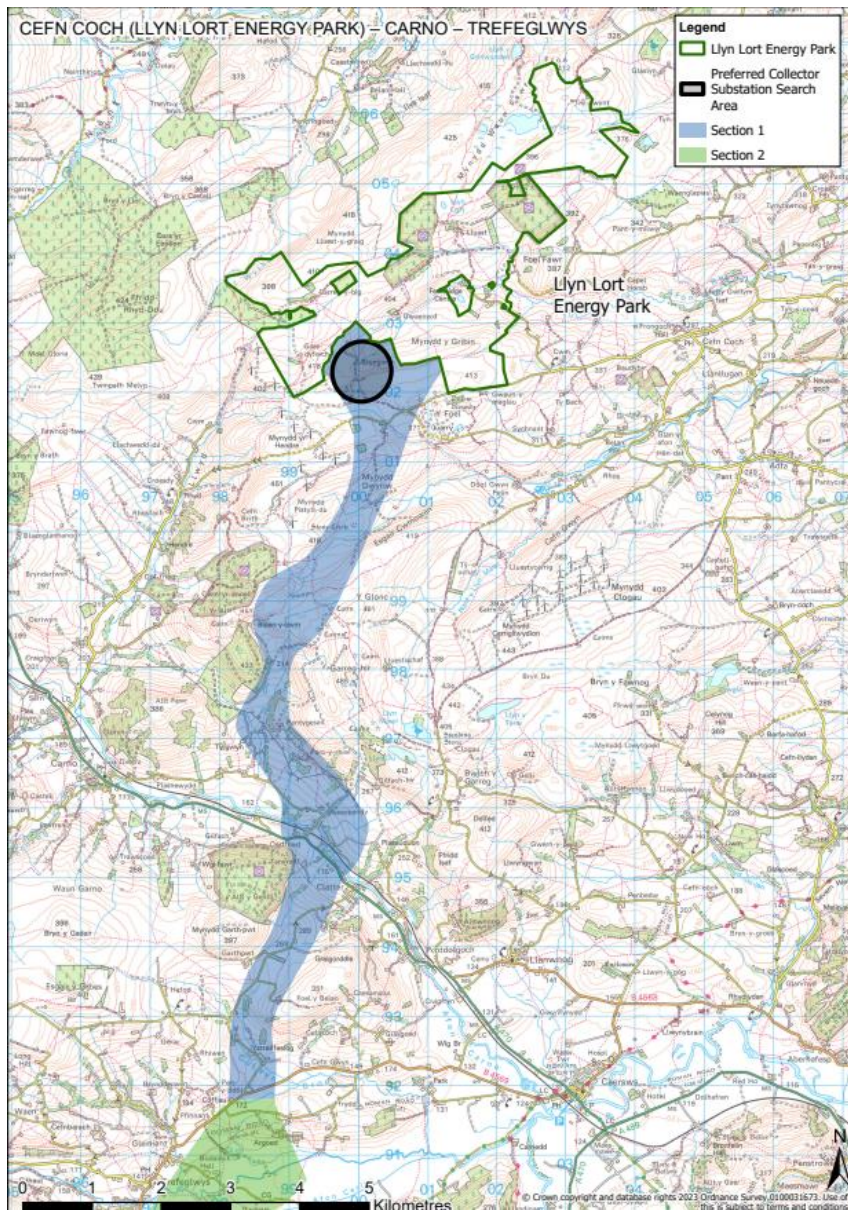
A Option appraisal maps/route options



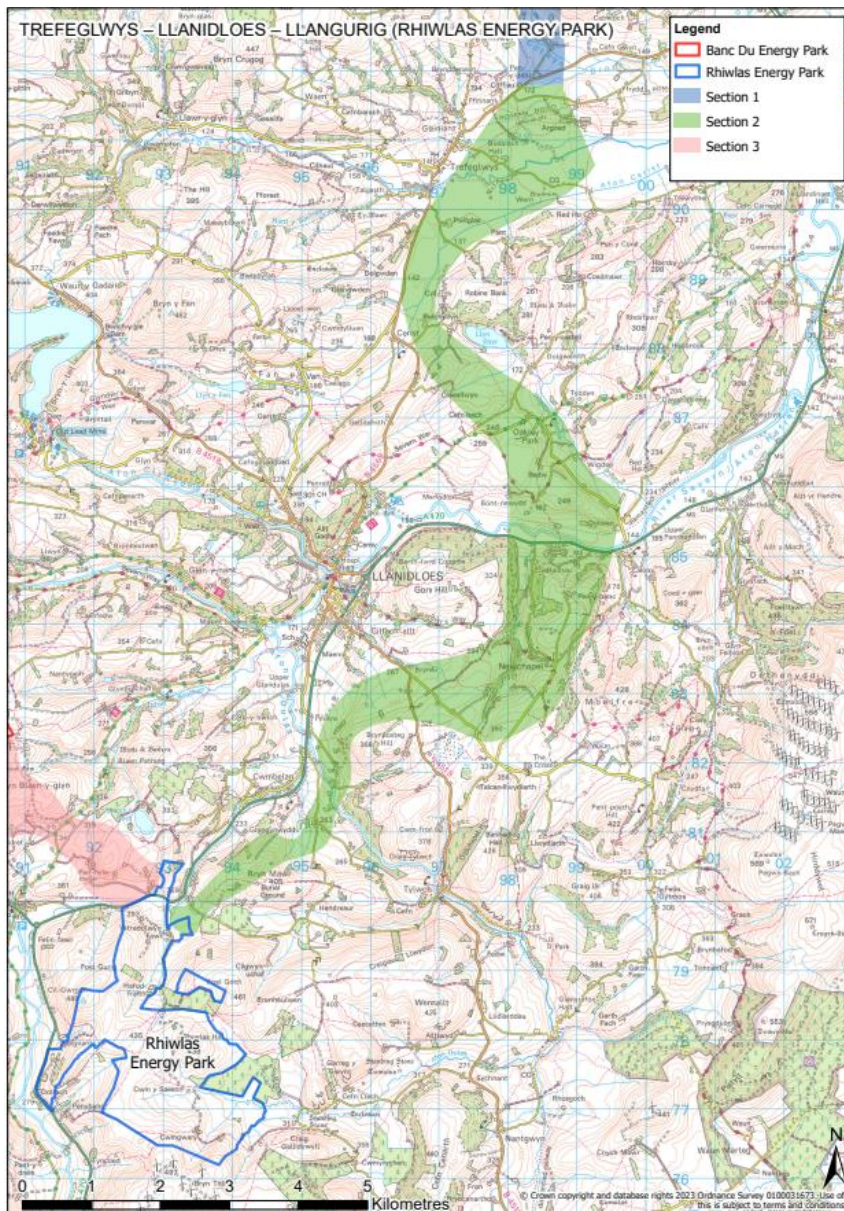


B Consultation section maps

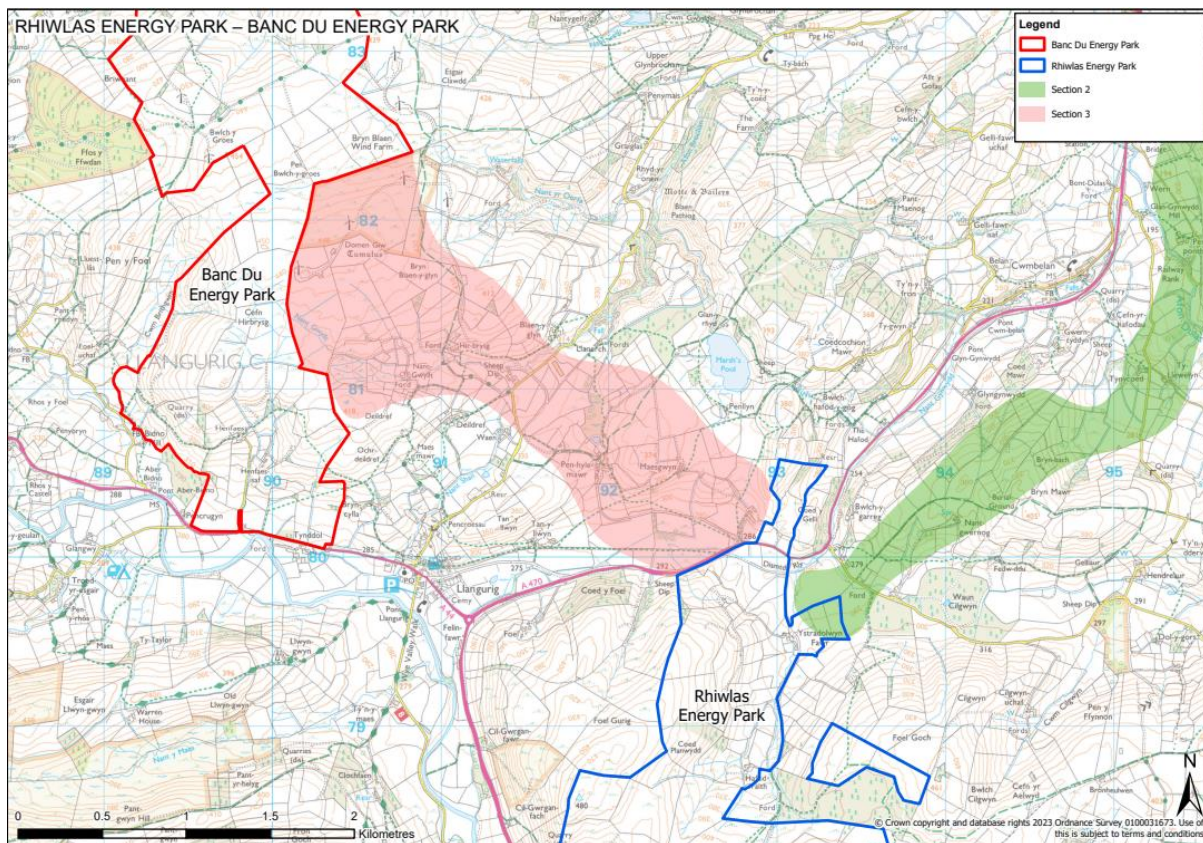
Section 1: Cefn Coch (Llyn Lort Energy Park) - Carno - Trefeglwys



Section 2: Trefeglwys – Llanidloes – Llangurig (Rhiwlas Energy Park)



Section 3: Rhiwlas Energy Park – Banc Du Energy Park



C Consultation materials

The project consultation website (now updated to reflect the conclusion of the consultation and next steps) can be found at www.rhiwlasgen.wales

These include:

- Consultation Flyer
- Consultation Brochure
- Feedback Form
- Exhibition Panels
- Approach to Routeing Infrastructure Across England & Wales
- Green GEN Phase 2 Grid Connection Strategy

D List of stakeholders (disaggregated into technical and non-technical)

Powys County Council

- Cllr James Gibson-Watt – Leader of Powys County Council, Cabinet Member for an Open & Transparent Powys
- Cllr David Selby – Cabinet Member for a More Prosperous Powys
- Cllr Jackie Charlton – Cabinet Member for a Greener Powys
- Cllr Jake Berriman – Cabinet Member for a Greener Powys
- Cllr Gareth Morgan – County Councillor

- Cllr Glyn Prescott - County Councillor
- Cllr Gary Mitchell – County Councillor
- Cllr Karl Lewis – Chair of Planning Committee
- Cllr Les George – County Councillor
- Cllr Heulwen Hulme – Planning Committee
- Cllr Gareth Jones – County Councillor
- Emma Palmer – Interim Chief Executive
- Nigel Brinn – Executive Director – Economy & Environment
- Gwilym Davies – Head of Property, Planning & Public Protection
- Matt Perry – Head of Highways, Transport & Recycling

Community & Town Councils

- Sophie Palmer – Llangurig Community Council & Caersws Community Council
- David Powell – Llanidloes Community Council
- Shirley Lewis – Llanidloes without Community Council
- Kat Holwill – Trefeglwys Community Council
- Alan Humphreys – Carno Community Council
- Mrs S Yeomans – Dwyrw Community Council
- Jane Johnston – St Harmon Community Council
- Jennifer Turner – Llandinam Community Council
- Sarah Reast – Llanbrynmair Community Council
- Dawn Thomas-Jones – Llanerfyl Community Council
- Rachel Hamer – Aberhasefp Community Council
- Robert Robinson – Llanfair Caereinion Town Council

Senedd Members

- Russell George MS
- Cefin Campbell MS
- Jane Dodds MS
- Eluned Morgan MS
- Joyce Watson MS

Member of Parliament

- Craig Williams MP

Welsh Government Senedd Members

- Lesley Griffiths MS – Minister for Rural Affairs, North Wales & Trefnydd
- Rebecca Evans MS – Minister for Local Government
- Vaughan Gething MS – Minister for Economy
- Julie James MS – Minister for Climate Change
- Lee Waters MS – Deputy Minister for Climate Change
- John Howells – Change, Energy & Planning Dept

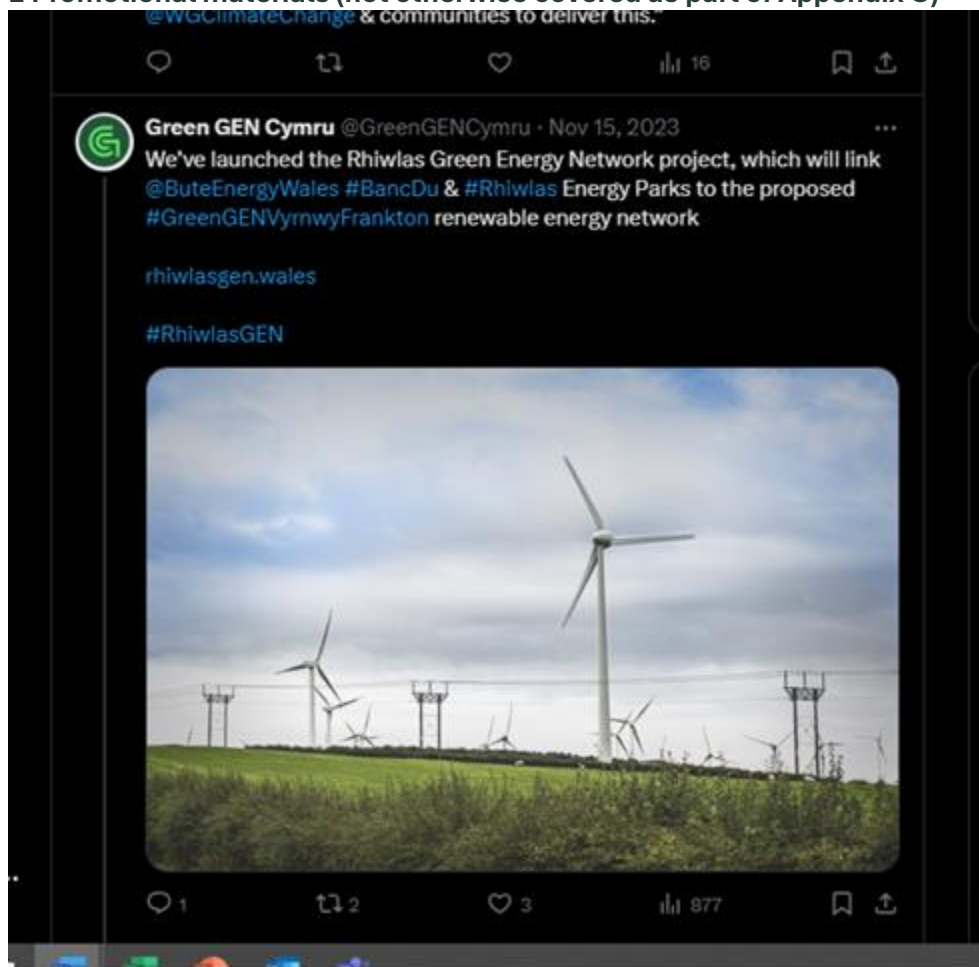
Welsh Government Officials

- Dewi Rowlands – Deputy Director of Transport & Head of Transport Planning

Technical and Community Stakeholders

- Asset Protection Team – National Grid
- Scottish Power Energy Networks
- Dŵr Cymru
- Traffic Wales
- Cynnal Cymru
- RSPB
- Wales Biodiversity Partnership
- Chambers Wales
- Mid Wales Tourism
- Powys Ramblers
- Powys Action on the Climate Emergency
- British Horse Society
- Sustrans Cymru
- Powys Windfarm Supporters
- Natural Resources Wales
- CADW
- The Coal Authority
- The Health & Safety Executive
- The Theatres Trust
- Sport Wales

E Promotional materials (not otherwise covered as part of Appendix C)



F Lands team correspondence

Introductory letter sent to landowners – English version

Address Line1
Address Line2
Address Line3
Postcode

DATE

Dear Name

Green GEN Cymru – Rhiwlas Green Energy Network Project

Green GEN Cymru, part of the Bute Energy Group, is developing proposals for a new 132kV overhead line to be supported on wood poles. The overhead line will take the electricity generated by Bute Energy's proposed energy parks at Banc Du and Rhiwlas to the electricity transmission system, providing clean, green energy. The Rhiwlas Green Energy Network also includes a shorter, underground section of cabling, at the lower voltage of 33kV, between the two Energy Parks.

We are writing to you because we believe you have a land interest within the area of our proposed project. We recognise that this news is significant and that you will have questions about what this means for you. In this letter we set out the background to our proposals and explain what

happens next. Please find below a short overview of the project, as well as details of our consultation and upcoming events when you can meet the project team. Enclosed is also a leaflet which has been sent to the local communities near to our proposals, which provides more information about the project and our public consultation process.

Introduction to Green GEN Cymru and Bute Energy

Green GEN Cymru plans to build and operate an electricity network for new renewables. Our connections will make sure renewable energy can flow to our homes, hospitals, schools, businesses, and communities. We're an independent business that is 100% funded by the Bute Energy Group and its investment partners. We're playing a pivotal role in creating a more resilient and reliable network providing for a future in which we all rely more on electricity as we move away from gas and oil.

Bute Energy has a vision of a healthier, wealthier Wales that uses energy generation as a positive power for the world, for Wales, for local communities – for this and future generations. We're based in Cardiff and are tackling the climate emergency by powering Wales with clean, green energy, and empowering our communities through investment, jobs, and skills.

Why the project is needed

The Welsh and UK Governments both want to accelerate the development of renewable energy as part of plans to address the climate emergency. In Mid Wales, new energy parks are proposed, however the existing electricity network does not have the capacity to connect them. To help end the use of fossil fuels we need new infrastructure and quickly. Green GEN Cymru's Rhiwlas Green Energy Network is proposed in order to meet this need. The new connection could also contribute to a more resilient and reliable electricity network for the region.

Our Rhiwlas GEN project

Our proposals include a new 132 kV, wood pole, overhead line from the Banc Du and Rhiwlas Energy Parks to a collector substation proposed near Cefn Coch, Llanfair Careinion, which is proposed as part of Green GEN Cymru's Vyrnwy Frankton connection project. The electricity would then connect to the transmission system and be supplied to homes and businesses across Wales and England.

The Banc Du and Rhiwlas Energy Parks, near Llangurig in Powys, are currently being proposed by Bute Energy. With a combined total of 22 wind turbines, the Banc Du and Rhiwlas Energy Parks have the potential to generate around 145MW of electricity, enough electricity for over 124,000 homes per year.

The Rhiwlas GEN project is still in the early stages. We have completed a range of preliminary assessments to identify our proposed corridor for the overhead line and underground cable routes. These have considered effects on people and place, environment, landscape and heritage, as well as technical needs and costs.

Public consultation

Our first phase of public consultation will run from Wednesday 15 November 2023 to Wednesday 10 January 2024. The consultation will share information on the need for the new connection, our emerging proposals, and how we have identified the proposed route for the connection. We will seek feedback from landowners, communities and wider stakeholders at this early stage of development.

This will be the first of three planned consultations. We have made a variety of materials available through our consultation website, www.rhiwlasGEN.wales, including a dedicated area for potentially affected landowners. We have also organised a series of local in-person events, details of which can be found on the enclosed leaflet. We encourage you to provide feedback through the consultation process should you wish to do so.

What does this mean for you?

We would like to talk to you as we believe you have an interest in land that may be affected by the Rhiwlas Green Energy Network. We recognise that you are likely to have a number of immediate questions about what this means for you.

It is important to note that land referencing and certain surveys will need to be carried out over a wider area around the preferred route. A request to complete a questionnaire or undertake surveys on any piece of land does not mean that it will necessarily form part of the route or have infrastructure placed on it.

We have appointed WSP as our land agents for this project. They will act as a direct point of contact for you throughout the project's lifetime. You will soon receive a letter from WSP to arrange a meeting with you to discuss the project in more detail and answer any initial questions you might have. This will also be an opportunity for us to better understand the potential impact on your land interest and to gather your feedback before we further develop the project.

We recognise that people have differing views on new infrastructure, and concerns about wood poles featuring in the landscape. Delivering the infrastructure we need to address climate change requires a careful balance. We are focused on causing the least disturbance to the environment and those who live, work and enjoy recreation close to our proposals.

We will develop our proposals sensitively and assess if any of the connection needs to be placed underground in response to ongoing assessments and consultation feedback.

We hope that the information above is useful and addresses any initial questions you may have. Should you have any queries, or wish to arrange a meeting, then please do not hesitate to get in touch with us at:

- info@rhiwlasGEN.wales
- 0800 699 0081 (Monday – Friday, 9am-5pm)

Yours sincerely



Gareth Williams
Grid Director

Introductory letter sent to landowners - Welsh version

Llinell Cyfeiriad 1
Llinell Cyfeiriad 2
Llinell Cyfeiriad 3
Cod post

DYDDIAD

Annwyl Enw

Green GEN Cymru – Prosiect Rhwydwaith Ynni Gwyrdd Rhiwlas

Mae Green GEN Cymru, sy'n rhan o Grŵp Bute Energy, yn datblygu cynigion i osod llinell uwchben 132kV newydd, a fydd yn cael ei chynnal gan bolion pren. Bydd y llinell uwchben yn trawsyrru'r trydan a gynhyrchir gan barciau ynni arfaethedig Bute Energy yn Rhiwlas a Banc Du i'r system trawsyrru trydan i ddarparu ynni glân a gwyrdd. Mae Rhwydwaith Ynni Gwyrdd Rhiwlas hefyd yn cynnwys darn byrrach o geblau o dan y ddaear, ar y foltedd is o 33kV, rhwng y ddau Barc Ynni.

Rydym yn ysgrifennu atoch oherwydd ein bod yn credu bod gennych fuddiant mewn tir yn yr ardal sy'n rhan o'n prosiect arfaethedig. Rydym yn cydnabod y bydd y newyddion wedi dod fel tipyn o sioc, ac y bydd gennych gwestiynau am beth mae hyn yn ei olygu i chi. Yn y llythyr hwn, rydym yn nodi cefndir ein cynigion ac yn egluro beth sy'n digwydd nesaf. Isod mae trosolwg byr o'r prosiect, yn ogystal â manylion ein hymgyngoriad a'r digwyddiadau sydd ar y gweill lle gewch gwrdd â thîm y prosiect. Amgaeir hefyd daflen sydd wedi cael ei hanfon i'r cymunedau lleol ger llaw ein cynigion, sy'n rhoi rhagor o wybodaeth am y prosiect a'n proses ymgynghori â'r cyhoedd.

Cyflwyniad i Green GEN Cymru a Bute Energy

Mae Green GEN Cymru yn bwriadu adeiladu a gweithredu rhwydwaith trydan ar gyfer ynni adnewyddadwy newydd. Bydd ein cysylltiadau'n sicrhau bod ynni adnewyddadwy yn cael ei gludo i'n cartrefi, ein hysbytai, ein hysgolion, ein busnesau a'n cymunedau. Rydym yn fusnes annibynnol sy'n cael ei ariannu 100% gan Grŵp Bute Energy a'i bartneriaid buddsoddi. Rydym yn chwarae rhan hollbwysig yn y gwaith o greu rhwydwaith mwy cadarn a dibynadwy – mewn dyfodol lle mae pob un ohonom yn dibynnu mwy ar drydan, wrth i ni symud oddi wrth nwy ac olew.

Mae gan Bute Energy weledigaeth o Gymru iachach a chyfoethocach sy'n defnyddio cynhyrchu ynni fel pŵer cadarnhaol i'r byd, i Gymru, i gymunedau lleol – i'r genhedlaeth hon ac i genedlaethau'r dyfodol. Rydym wedi ein lleoli yng Nghaerdydd ac rydym yn mynd i'r afael â'r argyfwng hinsawdd drwy roi pŵer i Gymru gydag ynni glân a gwyrdd, a grymuso ein cymunedau drwy fuddsoddiad, swyddi a sgiliau.

Pam mae angen y prosiect

Mae Llywodraeth Cymru a Llywodraeth y DU am gyflymu'r gwaith o ddatblygu ynni adnewyddadwy fel rhan o'u cynlluniau i fynd i'r afael â'r argyfwng hinsawdd. Yng Nghanolbarth Cymru, mae parciau ynni newydd wedi'u cynnig, ond nid oes gan y rhwydwaith trydan presennol y capasiti i'w cysylltu. Mae angen seilwaith newydd arnom ni ar frys er mwyn helpu i roi'r gorau i ddefnyddio tanwydd ffosil. Mae Rhwydwaith Ynni Gwyrdd Rhiwlas Green GEN Cymru wedi cael ei gynnig er mwyn diwallu'r angen hwn. Gallai'r cysylltiad newydd hefyd gyfrannu at rwydwaith trydan mwy cydnerth a dibynadwy ar gyfer y rhanbarth.

Ein prosiect Rhiwlas GEN

Mae ein cynigion yn cynnwys llinell uwchben, polyn pren, 132kV newydd o Barciau Ynni Banc Du a Rhiwlas i is-orsaf gasglu arfaethedig ger Cefn Coch, Llanfair Caereinion, sy'n cael ei gynnig fel

rhan o brosiect cysylltiad Efyrrwy Frankton Green GEN Cymru. Byddai'r trydan wedyn yn cysylltu â'r system drawsyrro ac yn cael ei gyflenwi i gartrefi ac i fusnesau ledled Cymru a Lloegr.

Ar hyn o bryd, mae Bute Energy yn cynnig Parciau Ynni Banc Du a Rhiwlas, ger Llangurig ym Mhowys. Gyda chyfanswm o 22 tyrbin gwynt, mae gan barciau ynni Banc Du a Rhiwlas y potensial i gynhyrchu tua 145MW o drydan, digon o drydan ar gyfer dros 124,000 o gartrefi'r flwyddyn.

Mae prosiect Rhiwlas GEN yn dal yn y camau cynnar. Rydym wedi cwblhau amrywiaeth o asesiadau rhagarweiniol i nodi'r coridor rydym yn ei gynnig ar gyfer y llinell uwchben a llwybrau'r ceblau o dan y ddaear. Mae'r rhain wedi ystyried yr effeithiau ar bobl a lleoedd, yr amgylchedd, tirwedd a threftadaeth, yn ogystal ag anghenion a chostau technegol.

Ymgynghoriad cyhoeddus

Bydd cam cyntaf ein hymgyngoriad â'r cyhoedd yn cael ei gynnal rhwng dydd Mercher 15 Tachwedd 2023 a dydd Mercher 10 Ionawr 2024. Bydd yr ymgynghoriad yn rhannu gwybodaeth am yr angen am y cysylltiad newydd, ein cynigion, a sut rydym wedi nodi'r llwybr arfaethedig ar gyfer y cysylltiad. Yn ystod y cam cynnar hwn o'r datblygiad, byddwn yn gofyn am adborth gan dirfeddianwyr, cymunedau a rhanddeiliaid ehangach.

Dyma fydd y cyntaf o dri ymgynghoriad arfaethedig. Rydym wedi darparu amrywiaeth o ddeunyddiau drwy ein gwefan ymgynghori, www.rhiwlasGEN.cymru, gan gynnwys ardal benodol ar gyfer tirfeddianwyr a allai gael eu heffeithio. Rydym hefyd wedi trefnu cyfres o ddigwyddiadau wyneb yn wyneb lleol, ac mae'r manylion ar gael ar y daflen amgaeedig. Rydym yn eich annog i roi adborth drwy'r broses ymgynghori os ydych yn dymuno gwneud hynny.

Beth fydd hyn yn ei olygu i chi?

Hoffem siarad â chi gan ein bod yn credu bod gennych chi fuddiant mewn tir y gallai Rhwydwaith Ynni Gwyrdd Rhiwlas effeithio arno. Rydym yn cydnabod ei bod yn debygol y bydd gennych nifer o gwestiynau ynghylch beth mae hyn yn ei olygu i chi.

Mae'n bwysig nodi y bydd angen cyfeirnodu'r tir a chynnal arolygon penodol ar yr ardal ehangach o amgylch y llwybr sy'n cael ei ffafrio. Mae'n bwysig nodi nad yw cais i lenwi holiadur neu gynnal arolygon ar unrhyw ddarn o dir yn golygu y bydd y darn hwnnw o reidrwydd yn rhan o'r llwybr nac yn cael seilwaith arno.

Rydym wedi penodi WSP fel ein hasiantiaid tir ar gyfer y prosiect hwn. Byddant yn gweithredu fel pwynt cyswllt uniongyrchol i chi drwy gydol y prosiect. Cyn bo hir, byddwch yn cael llythyr gan WSP i drefnu cyfarfod fel y gallent drafod y prosiect yn fanylach ac ateb unrhyw gwestiynau a allai fod gennych. Bydd hwn hefyd yn gyfle i ni ddeall yn well yr effaith bosibl ar eich buddiant tir, ac i gasglu eich adborth cyn i ni ddatblygu'r prosiect ymhellach.

Rydym yn cydnabod bod gan bobl safbwyntiau gwahanol ar seilwaith newydd, a phryderon am bolion pren yn y dirwedd. Mae darparu'r seilwaith sydd ei angen arnom i fynd i'r afael â newid yn yr hinsawdd yn galw am gydbwysedd gofalus. Rydym yn canolbwyntio ar darfu cyn lleied â phosibl ar yr amgylchedd a'r rheini sy'n byw, yn gweithio ac yn mwynhau gweithgareddau hamdden yn agos at ein cynigion.

Byddwn yn datblygu ein cynigion yn sensitif ac yn ystyried a oes angen gosod unrhyw ran o'r cysylltiad o dan y ddaear mewn ymateb i asesiadau parhaus ac adborth i'r ymgynghoriad.

Gobeithio bydd yr wybodaeth uchod yn ddefnyddiol ac yn ateb unrhyw gwestiynau sydd gennych chi.

Os oes gennych unrhyw ymholiadau, neu eich bod eisiau trefnu cyfarfod, mae croeso i chi gysylltu â ni:

- info@rhiwlasGEN.wales
- 0800 699 0081 (Dydd Llun i ddydd Gwener, 9am tan 5pm)

Yn gywir

A handwritten signature in black ink, appearing to read 'Gareth Williams'.

Gareth Williams
Cyfarwyddwr y Grid

