

Foel Trawsnant Wind Farm

S73 Application: Non-Technical Summary

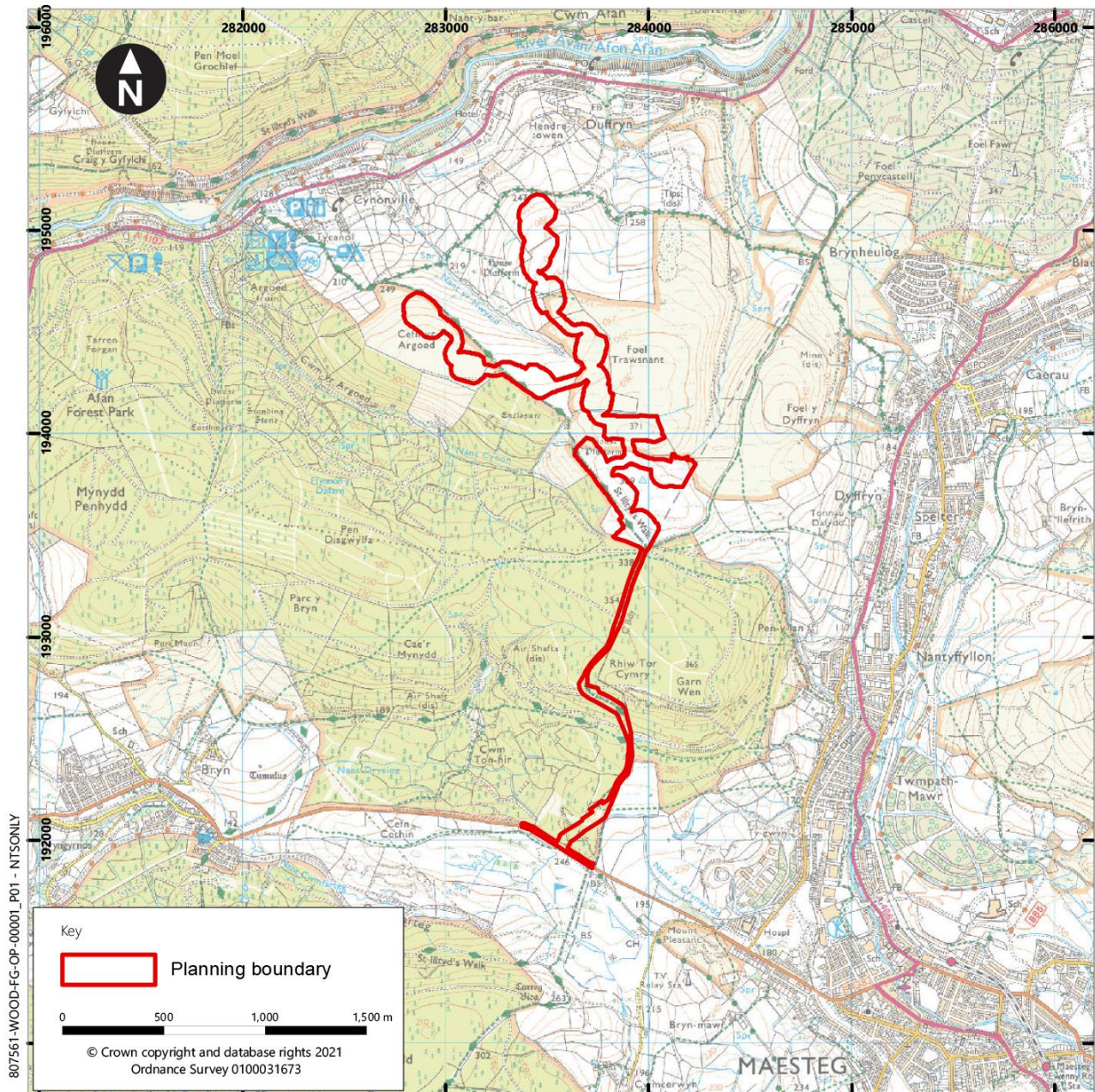
1. Introduction

- 1.1.1 On 25 November 2021 Neath Port Talbot County Borough Council (NPTCBC) granted planning permission for the installation of 11 wind turbines with a maximum blade tip height of 145m together with ancillary infrastructure (hereafter 'the approved development') at a site known as Foel Trawsnant.
- 1.1.2 The permission includes 40 planning conditions. Following initial discussions with officers at NPTCBC it is the intention of Pennant Walters (FoelT) Ltd ('the Applicant') to submit an application to vary planning condition 3 (List of Approved Plans), under Section 73 of the Town and Country Planning Act 1990, to authorise the following:
- An increase in the maximum rotor diameter from up to 90m to up to 133m, whilst maintaining the maximum height to blade tip of 145m.
- 1.1.3 Whilst the approved development is for the installation of up to 11 turbines, the Applicant is currently proposing to only install eight of these – a reduction that is allowed for following the approval of Non-Material Amendment (NMA) application (LPA Ref. P2022/0344).
- 1.1.4 To accompany the application an updated Environmental Impact Assessment (EIA) has been undertaken. EIA is a process that identifies the environmental effects of a development and identifies ways that these effects can be reduced and/or managed. An EIA is required by law for large developments that have the potential to cause 'significant' environmental effects. The findings of this process are reported in an addendum to the previous Environmental Statement ('the 2019 ES'). The ES Addendum for the Proposed Development is a public document available for anyone to inspect.
- 1.1.5 The ES Addendum has been prepared in accordance with *The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017* (the EIA Regulations). It presents the likely environmental effects of the 'Proposed Development' and concentrates on the potential environmental effects arising from proposed changes to the approved development, i.e. the proposed increase in rotor diameter. The EIA, where relevant, also considers the reduction in turbine numbers – permission for which is not required as part of this Section 73 application.
- 1.1.6 The ES Addendum document presents environmental information that is either supplemental to, or replaces, the information presented in the 2019 ES which can be found in **Appendix 1A** of this Addendum. Where the ES Addendum does not supplement or replace the information contained in the 2019 ES information remains valid and up to date. It is recognised that the ES Addendum must therefore be read alongside the 2019 ES in order to fully understand the likely significant environmental effects of the Proposed Development as a whole.
- 1.1.7 This document sets out a summary of the findings from the ES Addendum in non-technical language.

2. The wind farm site

- 2.1.1 The Foel Trawsnant Wind Farm site is located approximately 2.3km to the north-west of Maesteg, Bridgend (albeit the site lies entirely within the NPTCBC administrative area).
- 2.1.2 The proposed turbines would be sited on currently open land used primarily for grazing of livestock. The development site rises to a maximum height of approximately 371 m AOD and occupies a position toward the northern end of the higher ground between the Afan and Llynfi Valleys. Access to the site will be via the B4282, between Bryn and Maesteg.

Figure NTS2.1 Site location



3. The Proposed Development

3.1.1 The approved development comprises the following infrastructure:

- Up to eleven wind turbines with a maximum hub height of 100m and height to blade tip of 145m;
- Associated development including unit transformers at each turbine, access routes, electricity substation, and two temporary site compounds;
- Minor highways works on the B4282 to accommodate a new site access;
- The proposed wind farm is designed with an operational life of 25 years and permission is sought for this period of operation only. After this period the site can be fully restored or future generations can decide how they want to secure their energy needs;
- Construction of the wind farm is anticipated to take about 12 to 24 months, depending upon weather conditions; and
- The Applicant is a Welsh wind farm operator based within Rhondda Cynon Taff who develop wind energy projects solely within Wales.

3.1.2 The Applicant is seeking permission for a revised development ('the Proposed Development') which differs from the approved development as follows:

- An increase in the rotor diameter of five of the consented turbines (T5, T6, T9, T10 and T11) to 133m; and
- An increase in the rotor diameter of three of the consented turbines (T1, T2 and T8) to 117m.

3.1.3 As stated in **Section 1**, although the approved development is for 11 turbines the Applicant is currently proposing to install 8 of the turbines with turbines T3, T4 and T7, and associated infrastructure including crane pads, cabling and connecting site access tracks from the approved development being removed.

3.1.4 All other details remain as per the approved development with all elements accommodated within the approved red line planning boundary, which it is not proposed to change.

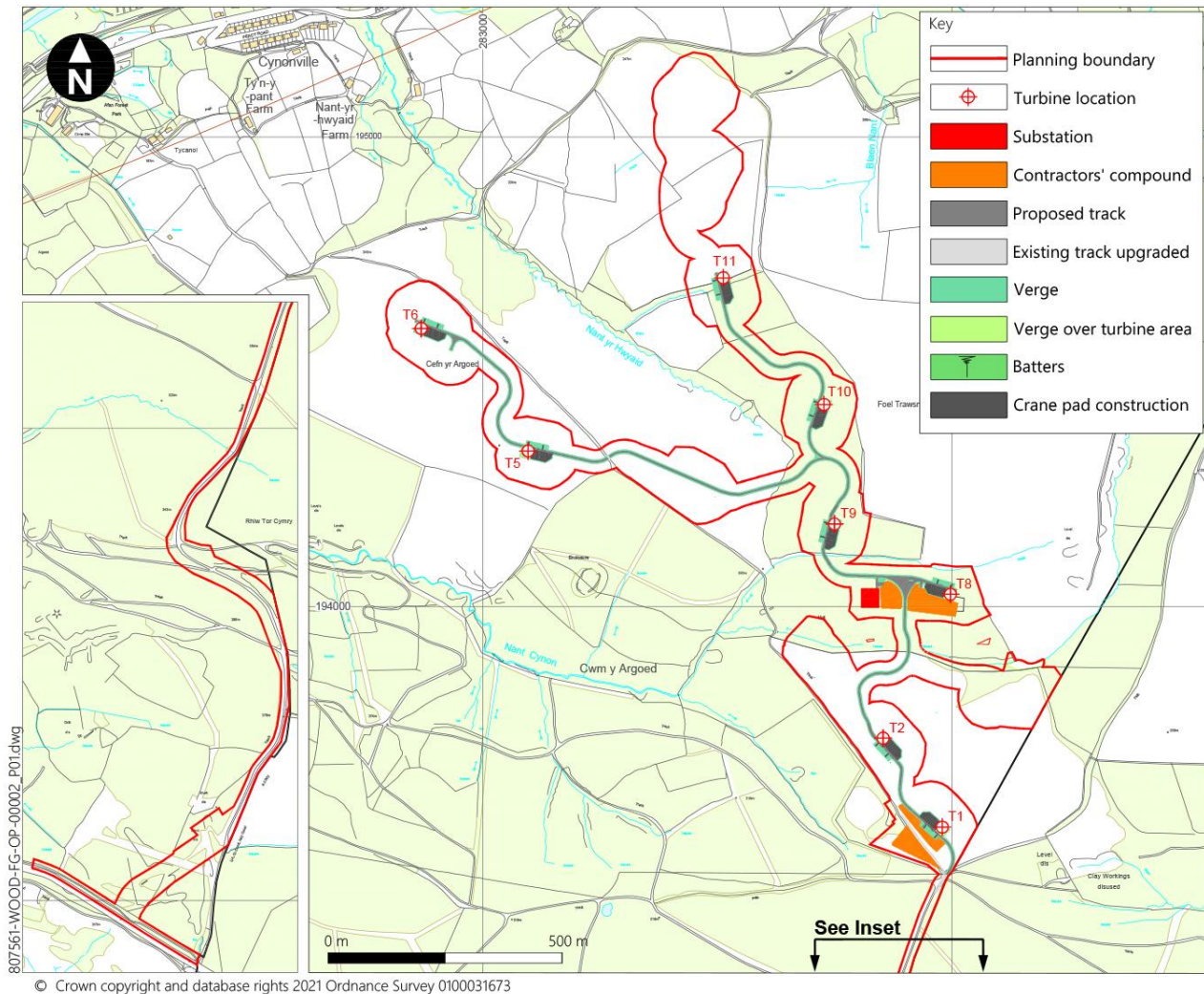
3.1.5 **Table 3.1** below shows the dimensions and grid references of turbines for the approved development and Proposed Development for comparative purposes. The layout of the Proposed Development is illustrated on **Figure NTS3.1**.

Table 3.1 Turbine Comparison between Approved and Proposed Development

Turbine	Approved Development	Proposed Development
T1	Hub height: 100m Rotor diameter: 90m Grid reference: E283979, N193524	Hub height: 86.5m Rotor diameter: 117m Grid reference: E283979, N193530
T2	Hub height: 100m Rotor diameter: 90m Grid reference: E283842, N193719	Hub height: 86.5m Rotor diameter: 117m Grid reference: E283853, N193719
T3	Hub height: 100m Rotor diameter: 90m Grid reference: E283693, N193910	REMOVED
T4	Hub height: 100m Rotor diameter: 90m Grid reference: E283428, N194260	REMOVED
T5	Hub height: 100m Rotor diameter: 90m Grid reference: E283092, N194327	Hub height: 78.5m Rotor diameter: 133m Grid reference: E283096, N194329
T6	Hub height: 100m Rotor diameter: 90m Grid reference: E282867, N194591	Hub height: 78.5m Rotor diameter: 133m Grid reference: E282868, N194591
T7	Hub height: 100m Rotor diameter: 90m Grid reference: E284155, N193809	REMOVED
T8	Hub height: 100m Rotor diameter: 90m Grid reference: E284009, N194034	Hub height: 86.5m Rotor diameter: 117m Grid reference: E283996, N194025
T9	Hub height: 100m Rotor diameter: 90m Grid reference: E283761, N194191	Hub height: 78.5m Rotor diameter: 133m Grid reference: E283748, N194174
T10	Hub height: 100m Rotor diameter: 90m Grid reference: E283728, N194431	Hub height: 78.5m Rotor diameter: 133m Grid reference: E283726, N194429
T11	Hub height: 100m Rotor diameter: 90m Grid reference: E283513, N194700	Hub height: 78.5m Rotor diameter: 133m Grid reference: E283512, N194698

3.1.6 The Applicant's intention to not construct turbines T3, T4 and T7 from the approved development would result in a reduction in the total area of the temporary and permanent site infrastructure from 9.6ha in the approved development to 6.53ha.

3.1.7 The approved development included approximately 5.5km of site access tracks which included 1.8km of the existing forestry track which leads from the entrance off the B4282 to the site. The proposed removal of T3, T4 and T7 would result in the length of new site access tracks required reducing by 580m to approximately 1.22km.

Figure NTS3.1 Layout of the Proposed Development

4. The need for onshore wind power and the policy context

- 4.1.1 The primary purpose of the Proposed Development is to generate renewable energy, and in doing so, assist in the reduction of the emission of greenhouse gasses by offsetting the need for production of electricity from combustion of fossil fuels. Chapter 6 of the ES Addendum outlines the prevailing climate change and renewable energy legislation and policy framework, which is supportive of onshore wind farms in principle, subject to siting and environmental considerations.
- 4.1.2 Since the submission of the ES in 2019 the key national policy context set out in Section 6.3 of Chapter 6 of that document has changed substantially. Future Wales: The National Plan 2040 ('Future Wales' from here on) was published by the Welsh Government in February 2021. Alongside the publication of Future Wales, the latest Planning Policy Wales (Edition 11) was published.
- 4.1.3 Future Wales reaffirms the Welsh Government's commitment to maximising renewables and the Welsh Government targets:
- For 70% of electricity consumption to be generated from renewable energy by 2030;

- for one gigawatt of renewable energy capacity to be locally owned by 2030; and
- for new renewable energy projects to have at least an element of local ownership from 2020.

4.1.4 Future Wales confirms that energy generation accounted for 29% of GHG emissions in 2018 and is clear that large scale renewable electricity generation is vital to meeting renewable energy and climate change targets and alternatives would not meet the targets (page. 97):

"The Welsh Ministers have considered alternatives to the need for new large-scale electricity generation infrastructure, including building-mounted installations and energy efficiency measures. Although we believe that these measures have an important part to play in meeting our energy, decarbonisation and climate change targets, they will not enable us to meet these objectives on their own."

4.1.5 Future Wales identifies ten Pre-Assessed Areas (PAAs) for wind within which there is a presumption in favour of large-scale wind development. The Proposed Development site is wholly within PAA 9 for wind.

4.1.6 PPW11 reaffirms the Welsh Government's targets for renewable energy generation and local ownership. Para 5.7.7 states that *"The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance."*

4.1.7 The Proposed Development would likely produce between 33-35MW of renewable energy and will therefore contribute towards meeting the target to increase renewable energy in Wales, taking advantage of Wales' abundant wind resource, and further reduce the reliance on fossil fuels.

5. Environmental Impact Assessment

5.1.1 EIA is a process by which information about the environmental effects of a project is collected, evaluated, and taken into account in its design. It considers the people and environmental resources (collectively known as 'receptors') that could be affected by the proposed development.

5.1.2 If the project is given consent, the EIA process provides a consideration of the most appropriate methods for its construction, operation and decommission.

5.2 Potential environmental effects

5.2.1 The following sections provide a brief summary of the main findings of the EIA as set out in the technical chapters of the ES Addendum. As required by *The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017*, the ES Addendum sets out whether effects on these receptors would be 'significant' or not. Effects which are considered 'significant' are deemed important enough to influence the decision to be taken by the competent authority (Neath Port Talbot County Borough Council) as to whether planning permission should be granted based on a balance of the effects.

5.2.2 As stated in the introduction, the assessment of effects has concentrated on potential significant effects arising from the amendments to the approved development which already has planning permission.

5.2.3 Given the nature of the Proposed Development, whereby ground level elements of the approved development remain unchanged (apart from the removal of infrastructure relating to Turbines 3, 4 and 7), many predicted environmental effects are unchanged from those reported in the 2019 ES.

As such, the following environmental topics considered in the 2019 ES have only required high level assessment as part of the EIA for the Proposed Development:

- Historic Environment;
- Water Resources and Ground Conditions;
- Socio-economics;
- Aviation and Telecommunications; and
- Traffic and Transport (other than updated swept path analysis).

5.2.4 Where the potential for significant effects was identified, detailed assessment has been carried out, using methodologies appropriate to the different environmental topics that need to be considered as part of an EIA. These methodologies were based on recognised good practice. The following sections provide a brief summary of the main findings of the EIA as set out in detail within the technical chapters of the ES Addendum.

5.3 Landscape and Visual

- 5.3.1 The Landscape and Visual Impact Assessment (LVIA) for the Proposed Development takes account of and assessed the proposed change in turbine dimensions to the approved development. The LVIA conforms to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA) and encompassed the construction, operation, and decommissioning phases of the Proposed Development. The design of the Proposed Development has maintained the geographical footprint of the approved development and has maintained accordance with the original design objectives limiting the number of significant landscape and visual effects. All landscape and visual receptors with the potential for likely significant effects were reassessed.
- 5.3.2 As the area of land permanently occupied by the Proposed Development would be slightly reduced in comparison to the approved development (from 9.6ha to 6.5ha), no new significant effects would arise in relation to direct changes to the physical landscape. As for the approved development, the effects upon the landscape elements within the site would not be significant. There will also be no significant effects upon the Brecon Beacons National Park or the Gower Area of Outstanding Natural Beauty, or any other national landscape designation.
- 5.3.3 Consideration has been given to the potential for the proposed reduction in the number of turbines, reduction in the hub height of the turbines and increase in the rotor diameter of the turbines to give rise to increased levels of landscape or visual effect in comparison to those predicted for the approved development in the 2019 LVIA. The key consideration has been the potential for the proposed amendments to result in increased magnitudes of landscape or visual change such that some landscape or visual receptors who would not experience significant effects as a consequence of the operation of the approved development would experience significant effects as a consequence of the operation of the Proposed Development.
- 5.3.4 Any potential new significant effects would either be visual effects or effects on landscape receptors via a visual pathway. In order to assess the potential for such effects to arise, 15 of the 30 viewpoints included in the 2019 LVIA have been compared and the potential effects arising from the Proposed Development, when compared to the approved development, have been assessed. These 15 viewpoints represent a selection of landscape and visual receptors, all of which are assessed as having High sensitivity to the Proposed Development and which were assessed in the 2019 LVIA as likely to experience a Moderate or Major, and therefore 'significant', level of effect.

- 5.3.5 The comparative viewpoint analysis has found that the Proposed Development would result in no change to the level of effect predicted for the approved development in relation to 14 of the 15 viewpoints assessed. For one viewpoint, Viewpoint 12, the analysis has concluded that the maximum level of effect would reduce from Moderate to Minor. In relation to all viewpoints, it was considered that the amendments to the approved development would result in an improvement to the appearance of Foel Trawsnant Wind Farm, though in most instances this was not pronounced enough to alter the predicted magnitude of change.

5.4 Historic environment

- 5.4.1 The effects of the Proposed Development on the historic environment have been reassessed following review of the proposed changes to the Consented Development, the historic environment baseline, the policy and statutory context and the cumulative baseline.
- 5.4.2 Effects on the Mynydd Margam Landscape of Special Historic Interest were assessed through the completion of an ASIDOHL (Appendix 8A of the 2019 ES). This concluded that the development would have a slight impact (using the terminology in the ASIDOHL guidance) on the character of the historic landscape as a whole. In EIA terms, this would not be significant.
- 5.4.3 The site access tracks, hardstandings, foundations and laydown areas for the Proposed Development will not extend beyond areas previously assessed. The visual effects resulting from changes in the proportion of blade to tower will not change the conclusions of likely impacts to setting, or on the Mynydd Margam Landscape of Special Historic Interest, which are recorded in the 2019 ES. The height to blade tip of the turbines will not change.
- 5.4.4 It is therefore concluded that the Proposed Development would not give rise to any additional effects on the historic environment as compared to the approved development and the conclusions of the 2019 ES that there would be no significant effects on the Historic Environment are therefore unchanged.

5.5 Non-avian ecology

- 5.5.1 The assessment of effects on non-avian ecology considered effects arising from increasing the rotor diameter of all turbines and the intention to construct only 8 of the 11 turbines approved for development. As a result, the only important ecological features scoped into the detailed assessment were Section 7 habitats which require protection under the Environment (Wales) Act 2016 and bat populations. Effects on all other important ecological features would be predicted to remain non-significant and unchanged from the 2019 ES and were therefore excluded from further consideration.
- 5.5.2 Due to the reduction in the total area of the temporary and permanent site infrastructure as a result of the intention to only construct 8 turbines instead of the approved 11, the approximate areas of Section 7 habitats that would be directly affected by temporary and permanent site infrastructure have been reduced as follows:
- Upland flushes, fens and swamps: 0.82ha (2019 ES) to 0.42 ha (2022 Proposed Development);
 - Upland heathland: 3.12ha (2019 ES) to 2.73ha (2022 Proposed Development); and
 - Blanket bog: 0.02ha (2019 ES) to 0ha (2022 Proposed Development).
- 5.5.3 With respect to bats, while the increased rotor diameters are considered to increase the potential risk of bat mortality through direct collision and barotrauma (physical damage to body tissues caused by a difference in pressure), due to the low bat activity levels recorded during previous site

surveys, and the fact that common pipistrelle, which are a common and widespread species, form the majority of contacts for high collision risk species, this is unlikely to affect the favourable conservation status of bat populations. As such, it is considered unlikely that the Proposed Development would result in significant adverse effects on bat species and populations.

- 5.5.4 Overall there is no change to the conclusions from the 2019 ES with all effects considered to be not significant.

5.6 Ornithology

- 5.6.1 Formal consultation with NPTCBC was undertaken on 07 February 2022 to discuss the scope of any surveys with respect to ornithology. The following survey/desk study updates have been agreed and completed during 2021 and 2022:

- Update Non-breeding and breeding period Vantage Point Surveys – this has included 36 hours of monitoring (at each VP) completed between December 2021 and March 2022 (non-breeding period) and March 2022 with further surveys to be completed in July 2022 (breeding period);
- Moorland Bird Survey/Territory Mapping Verification – three survey visits will be undertaken between April and June to verify no changes in the breeding bird assemblage; and
- Updated desk study information relating to Honey Buzzard within Neath Port Talbot will be provided.

- 5.6.2 The scope of the detailed assessment for the Proposed Development has been established by assessing whether the proposed differences between the approved development and the Proposed Development have the potential to result in a change to the conclusions previously made and result in new or different likely significant effects. As the changes relate to increasing rotor diameter of all remaining turbines, with all ground level infrastructure, construction/decommissioning methods and embedded measures remaining unchanged, only those effects relating to collision risk and disturbance have the potential to change and have been subject to re-assessment.

- 5.6.3 Until completion of the surveys currently being undertaken and the production of updated collision risk modelling, it is not possible to conclude whether any changes to the original assessment conclusions would occur. However, based on the relatively low levels of bird activity across the site during the various surveys undertaken over the years and initial results from the 2021/2022 survey work, it is considered unlikely that any major changes would occur.

5.7 Noise

- 5.7.1 An assessment of the potential significant effects of the Proposed Development (alone and cumulative with other development) with respect to noise was undertaken. As different turbine types are proposed, which may have different sound power levels to those assessed in the 2019 ES with all other noise related elements related to road traffic and construction etc. remaining unchanged, the assessment considered operational turbine noise only. The same assessed receptors as those from the 2019 ES were considered:

- R1 - Tonnau Defaid;
- R2 - Penylan;
- R3 - Sunnyview;
- R4 - Teras Griffiths;

- R5 - Hendre Owen Farm;
- R6 - Ty'n-y Pant Farm;
- R7 - Nant-yr-hwyaidd Farm;
- R8 - Tycanol; and
- R9 - Neuadd-wen.

5.7.2 The locations of the above, as well as the locations of the noise monitoring exercise undertaken, are illustrated on **Figure NTS5.1**.

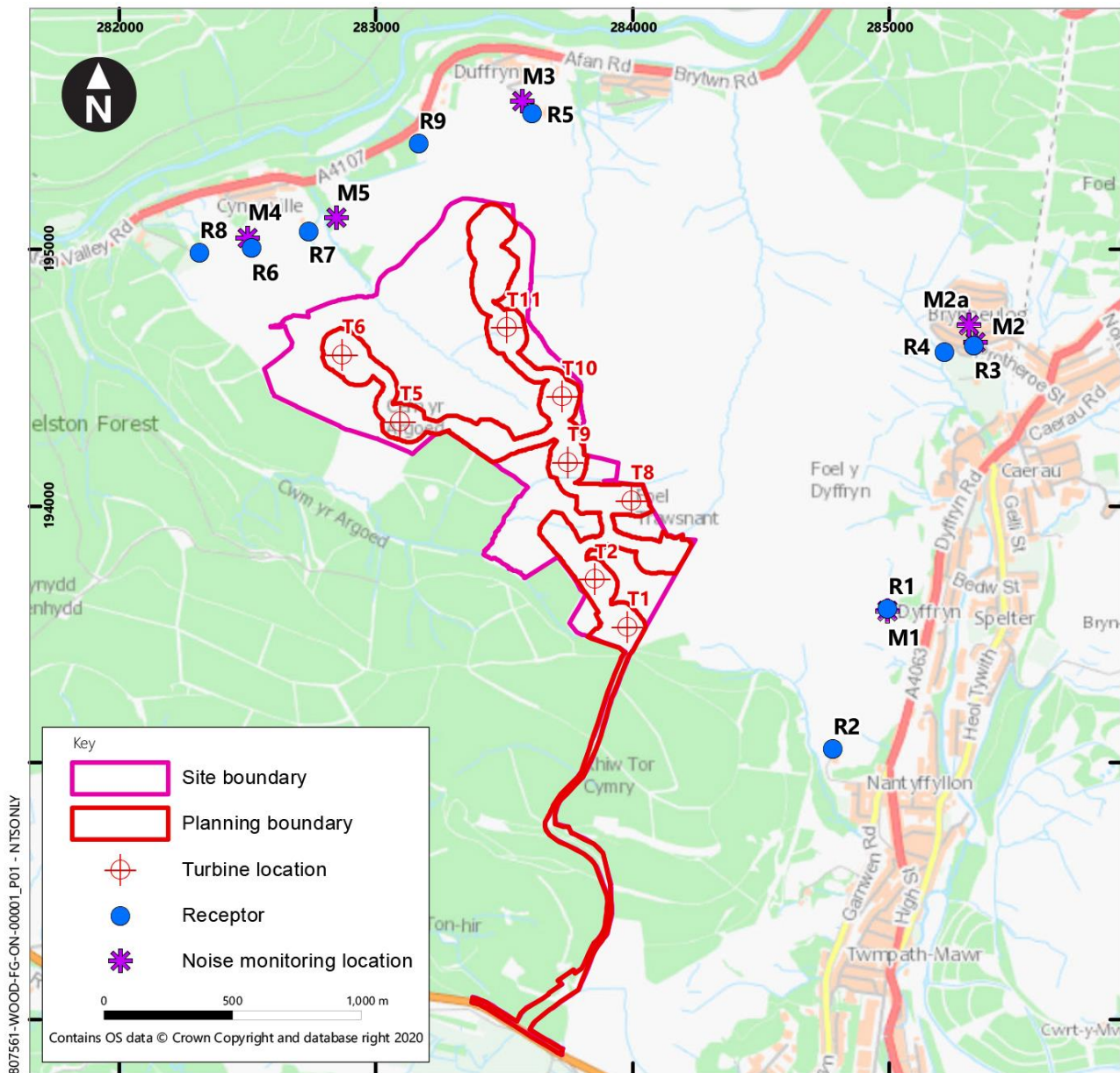
5.7.3 The results of the noise predictions show that, based on conservative assumptions, there is potential (depending on final turbine model selected) for an exceedance of the ETSU-R-97¹ criteria at Tycanol and Neuadd-wen during the daytime only when wind speeds at 10m are between 6 to 8m/s. Regarding the results of the assessment of the cumulative scenario, the assessment indicates that, significant effects are anticipated at receptors R8 and R9 during the daytime and at R9 during the night-time. ETSU-R-97 criteria would not be exceeded at any of the other receptors.

5.7.4 Potential mitigation measures to reduce turbine noise are therefore presented, for example the use of lower operational power. A variety of solutions are available therefore to ensure compliance with ETSU-R-97 noise limits, the exact nature of which will depend on the turbine selected for use. The key point is that it would be a condition of any planning consent that the Proposed Development is operated within the agreed noise limits and this is achievable.

5.7.5 By adhering to the environmental measures outlined in Chapter 11 of the ES Addendum, the predicted residual effects of the Proposed Development would be not significant.

¹ Department of Trade and Industry (1996). ETSU-R-97 The Assessment and Rating of Noise from Wind Farms.

Figure NTS5.1 Noise assessment receptor and noise monitoring locations



5.8 Water Resources and Ground Conditions

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| 5.8.1 | Detailed assessment of the effects of the Proposed Development on Water Resources and Ground Conditions have been scoped out from detailed assessment following review of the proposed changes to the approved development, the baseline, the policy and statutory context. |
| 5.8.2 | Chapter 12 of the 2019 ES considered potential effects on surface water, groundwater, flood risk and private water supplies. The chapter concluded that the construction, operation and decommissioning of the approved development would not lead to any significant effects on the water environment, provided that all recommended environmental measures outlined in Section 12.8 of the chapter were put in place. |

- 5.8.3 The position of tracks, hardstandings, foundations and laydown areas would not change outside of the micrositied allowance previously assessed. The reduction from 11 to 8 turbines would result in fewer impermeable and semi-permeable areas.
- 5.8.4 It is therefore concluded that the Proposed Development would not give rise to any additional effects on Water Resources and Ground Conditions as compared to the approved development and the conclusions of the 2019 ES that there would be no significant effects on the water environment are therefore unchanged.
- 5.8.5 A Coal Authority report, provided as Appendix 12B to the 2019 ES, confirmed that the development area is within the likely zone of influence from workings in 11 seams of coal at shallow to 780m depth. The planning boundary is not in the likely zone of influence of any present underground coal workings and is not in an extent that is likely to be affected at the surface from any planned future workings. The Coal Authority report, provided as Appendix 12A of the ES Addendum for completeness, provides approximate positions of three mine entries within the planning boundary.
- 5.8.6 According to the report, the Coal Authority *"is not aware of any evidence of damage arising due to geological faults or other lines of weakness that have been affected by coal mining"*.
- 5.8.7 A Coal Stability Risk Assessment, undertaken by James Associates, was provided as Appendix 12B of the 2019 ES. It identified six proposed turbines which lie within zones of potential impact associated with abandoned mining. The assessment recommends a programme of site investigation works be undertaken around the following turbines: T1, T2, T3, T4, T8 and T9. As stated in **Section 3** however, the Applicant no longer proposed to install turbines T3 or T4 (and T7). The Coal Stability Risk Assessment report is provided as part of **Appendix 12A** of the ES Addendum.

5.9 Traffic & transport

- 5.9.1 Apart from updating Swept Paths Assessments (SPAs) based on the worst-case scenario longest blade length of 67m for the Proposed Development, all other traffic and transport related environmental effects were scoped out of detailed assessment as these would remain unchanged from those reported in the 2019 ES.
- 5.9.2 To account for the potential additional impacts of delivering the larger 67m blades to the site, a revised abnormal load route and delivery methodology (using a blade lifter vehicle arrangement) has been proposed for the Proposed Development. The proposed route is as follows:
- M4 junction 36;
 - A4063 via Tondur, Coytrahen, Llangwynydd and Maesteg (into town centre);
 - B4282 Neath Road; and
 - B4282 to Site Access.
- 5.9.3 The SPAs demonstrate that, subject to some adjustments to existing highway infrastructure including the temporary removal of street furniture and some trimming of trees/hedgerows, abnormal loads can be accommodated on the proposed route.
- 5.9.4 It is considered that there would be no significant effects in relation to traffic and transport as a result of the Proposed Development.

5.10 People and Business (Socio-economics, recreation and tourism)

- 5.10.1 The Proposed Development would increase the size of turbine components only. The assessment concluded that residual effects in relation to climate change and energy security (beneficial but not significant), and Economy and community (beneficial and significant), are expected to remain unchanged from the 2019 ES. With respect effects on users of PRoW, Condition 13 of the existing planning permission relates to the diversion of PRoW within the site. The applicant no longer proposes to divert the bridleway (ProW 39) or footpath (PRoW 40) referred to in the condition. Both will remain in place and available to users with alternative routes also provided for use, if desired, during both the construction and operation phases. Effects will therefore remain negligible and not significant.
- 5.10.2 In conclusion, Socio-economic effects from the Proposed Development would remain unchanged from those reported in the 2019 ES for the approved development.

5.11 Shadow flicker

- 5.11.1 Under certain combinations of geographical position, time of day and year, the sun may appear behind turbine rotors and cast a shadow over neighbouring properties. Where the shadow falls through a narrow window opening, the rotation of the turbine blades results in it appearing to flick on and off; this effect is known as 'shadow flicker'.
- 5.11.2 No residential properties lie within the revised study area for the Proposed Development (1,380m (10 x 133m rotor diameter plus 50m micro-siting allowance) 130 degrees either side of north). As such, shadow flicker is not predicted and, as per the conclusion presented in the 2015 ES and 2017 FEI, there would be no significant effects or mitigation required.
- 5.11.3 The assessment has identified the potential for significant shadow flicker effects at 31 occupied buildings. Mitigation has been identified in the form of a control system which automatically shuts down the wind turbine causing the effect to restrict effects to less than 30 minutes per day and/or 30 hours per year at any property. With this measure in place no shadow flicker significant effects would arise from the Proposed Development.
- 5.11.4 A study has been undertaken to identify whether shadow flicker is likely to occur at residential properties in the vicinity of the proposed development. Modelling has been carried out to predict the duration of potential shadow flicker effects and the times of day and year when it could occur.
- 5.11.5 Planning conditions 24 and 25 of the planning permission for the approved development state:
- "24. The shadow flicker control system, as set out within the mitigation measures, section 15.13 of the ES shall be fully implemented prior to the first beneficial use of the wind farm and retained in perpetuity.*
- 25. None of the wind turbines hereby permitted shall be operated until a written scheme has been submitted to and approved in writing by the Local Planning Authority, setting out a protocol for the assessment of shadow flicker in the event of any complaint to the local planning authority from the owner or occupier of any dwelling (defined for the purposes of this condition as a building within Use Class C3 of the Use Classes Order) which lawfully exists or had planning permission at the date of this permission. The written scheme shall be implemented in accordance with the approved details."*
- 5.11.6 No changes are proposed to these conditions as a result of this current application and, as such, they will be retained for the Proposed Development to ensure that any complaints would be

investigated within a reasonable timescale and that the rectification of any shadow flicker problem that is substantiated would be implemented promptly and effectively.

5.12 Aviation and telecommunications

- 5.12.1 Detailed assessment of the effects of the Proposed Development on the aviation radar and telecommunications systems have been scoped out following review of the proposed changes to the approved development, the baseline, the policy and statutory context.

Aviation

- 5.12.2 The site is located in an area identified by the Ministry of Defence as not having any concerns with regards to low flying aircraft, and within an area identified as not being visible on National Air Traffic Service radar systems. Therefore no impacts on Aviation are anticipated.

Telecommunications

- 5.12.3 A Western Power Distribution (WPD) licensed radio system link was identified by Joint Radio Company (JRC) as running through the site in 2019. As agreed with JRC and WPD a scheme to ensure no effects on the link will be prepared and adopted before construction of the wind farm. The Applicant is committed to adopt measures proposed by JRC, and WPD, to resolve any potential signal interference problems should they arise as a result of construction and operation of the wind farm, and therefore there should be no resulting impact on these signals. This is in accordance with planning condition 15 for the approved development:

"No development shall commence until a scheme has been submitted to and approved in writing by the local planning authority (in consultation with Western Power Distribution (WPD) and the Joint Radio Company) providing for the mitigation of the impact of the development on any telecommunications links operated by WPD. The scheme shall be implemented as approved in writing by WPD."

- 5.12.4 There will be no changes to the previous conclusions given that the Proposed Development does not propose an increase to overall tip height, or movement outside agreed micro-siting allowances for the approved development (as per planning condition 27).

5.13 Cumulative effects

- 5.13.1 The EIA process includes consideration as to whether any of the individual effects of the Proposed Development would combine to create a cumulative effect greater than the sum of the individual effects. There are two types of cumulative effects to be considered:
- Inter-project effects: effects that arise as a result of the Proposed Development in combination with other large-scale developments or projects; and
 - Intra-project/Inter-related effects: effects that occur as a result of two or more environmental topic effects acting together (i.e. combined), to result in a new or changed effects on a single receptor.

Inter-project effects

- 5.13.2 Developments that are under construction, have a current valid planning permission, or have a current valid planning application, have been considered. Developments currently in operation have already been considered as part of the topic-specific assessments.
- 5.13.3 To reflect the time which has passed since the 2019 ES, an exercise has been undertaken to identify any new developments or planning applications for major developments within the Zone of Influence (ZoI) for the cumulative assessment, set at 23km based on the maximum ZoI of all technical topics (for the Landscape and Visual assessment). This identified that the following major developments have come forward since the 2019 ES:
- Y Bryn Wind Farm (Proposed; Scoping Direction received February 2021).
 - Mynydd Fforch Dwm Wind Farm (Proposed; Scoping Report submitted April 2022).
 - Upper Ogmere Wind Farm (Proposed; Scoping Submitted October 2021).
 - Ty'n Y Waun / Heol y Cyw Solar (Proposed; Pre-Application Advice submitted in December 2021).
 - Craig Y Perchyll Solar – (Proposed; Non-EIA Decision made in September 2021).
- 5.13.4 All of the other developments considered in the 2019 ES assessment of inter-project effects are now operational. The table also notes that none of the additional major developments which have come forward since the 2019 ES have been consented. They are all at the pre-application stage (i.e. less advanced than the Proposed Development) and do not have sufficient publicly available information to enable a robust assessment of inter-project cumulative effects to be undertaken.
- 5.13.5 Given that the Foel Trawsant Wind Farm is further along in the planning process, it is considered that the other major developments which have come forward since the 2019 ES should be taking the approved development into account in their assessments on inter-project cumulative effects. As is demonstrated by the assessments within the technical chapters (**7-16**) of the ES Addendum, and summarised in **Sections 5.3-5.12** of this note, the conclusions of the 2019 ES remain valid, or in some cases are improved due to the proposed reduction in turbine numbers from 8 to 11. Should the approved development be considered in the inter-project cumulative effects assessments of the other major developments discussed, this would therefore represent a worst-case scenario in terms of likely effects from the Proposed Development.

Inter-related effects

- 5.13.6 The Proposed Development does not introduce any new receptors when compared to the 2019 ES, and the conclusions of the individual topic chapters are either consistent with the 2019 ES or are improved due to the proposed reduction in turbine numbers from 8 to 11.
- 5.13.7 It is therefore concluded that the Proposed Development would not give rise to any additional intra-project (inter-related) cumulative effects as compared to the approved development and the conclusions of the 2019 ES that there would be no significant effects are therefore unchanged.

Conclusion

- 5.13.8 The ES Addendum has considered potential effects arising from the proposed variation to the approved development. These changes include an increase in the rotor diameter of five of the consented turbines (T5, T6, T9, T10 and T11) to 133m and an increase in the rotor diameter of three

of the consented turbines (T1, T2 and T8) to 117m. Furthermore it is the intention of the Applicant to only construct 8 of the 11 approved turbines.

- 5.13.9 The conclusions of the assessments confirm that no additional significant effects would arise as a result of the Proposed Development, when compared to those concluded for the approved development, and in some cases effects would see an improvement from those previously concluded.
- 5.13.10 The EIA process has materially influenced the design of the wind farm and a number of measures are proposed, which, if implemented, will address, reduce and in certain instances avoid significant effects.
- 5.13.11 The proposed wind farm will contribute between 33MW and 35MW toward the renewable energy targets of the Welsh Government. The social and economic benefits that derive from this development will be indirect and will include the strengthening of the nation's security of electricity supply and mitigation of the effects arising from climate change.
- 5.13.12 Further details concerning the potential effects which could arise from the changes to the scheme are contained within the ES Addendum. Copies of this document are available for inspection on the Neath Port Talbot County Borough Council online planning register:
<https://planningonline.npt.gov.uk/online-applications/>