

Matthew Griffiths

Subject: P2022/0517 Foel Trawsnant

From: Meryl Lewis <MerylLewis@walters-group.co.uk>

Sent: 03 October 2022 11:31

To: Matthew Griffiths <m.griffiths5@npt.gov.uk>

Subject: RE: P2022/0517 Foel Trawsnant

Good morning Matthew,

Thank you once again for sending through the noise comments – as we have previously discussed, it seems there are three main aspects to the response as follows:

1. Points of clarification/confirmation of information;
2. Proposed amended wording to the condition; and
3. Request to include Y Bryn in the cumulative assessment.

Dealing with each in turn:

1. Our noise consultant, Wood, has reviewed the noise response from Dick Bowdler and provide the following response to each of the matters raised:

4.1 Discrepancy on N117 turbines

Our most recent data available (2015) has the total sound power level at 105 dB from 8m/s upwards. This was taken from an online resource: <https://silverbirchwindfarm.com/wp-content/uploads/2017/04/Appendix-9-C-Wind-Turbine-Acoustic-Spec.pdf>

4.3 Turbine levels appear wrong at Pen y Lan

Unfortunately, there was an error for the day and night-time at receptor Pen y Lan for Foel Trawsnant only. This has now been corrected, with a very slight effect on the results of the cumulative assessment (lower noise) that makes no change to the conclusions of the assessment.

4.4 Discrepancy in predictions at Tonnau Defaid

We have rechecked the calculations. Please see attached for the protocol for Tonnau Defaid showing how the LAeq has been arrived, which has then been subtracted by 2 dB to form the L90.

5.1 Not correct comparison of FT alone

As described we have shown the cumulative in Tables 11.6 and 11.7 (plus other wind farm developments considered in the 2019 ES – which are now operational). It's still useful to see the contribution from the site on its own to know where issues might be.

5.2 Assessment should have used assumed condition levels.

It is standard procedure to use the sound power levels of either candidate or built wind farms rather than fill in the condition limits with turbine noise.

5.3 Condition calculation with FT only

Agreed that the process described can be used for conditions.

7.1 Description of significance of impact not in accordance with IEMA

The key to the assessment is whether or not there is an exceedance of the ETSU-R-97 limits and this designates significance.

An updated version of the Environmental Statement Addendum (ESA) is attached to the email where the chapter has been updated in light of the comments received. We have included a full version of the ESA as well as the noise chapter only to hopefully help with its review.

2. With regard to the proposed change to the wording of the current noise condition, we maintain that there is no need to amend the condition for the following reasons:
 - a. The application being considered by the Council relates only to a change in blade length. No other changes are proposed to the application and, therefore, an amendment to the condition that was only finalised in November does not seem necessary or proportionate to the application.
 - b. The Environmental Statement (ES) concludes that the proposed change would ensure that the operation of the wind farm keeps within the agreed noise limits as set out by the condition attached to the original consent. Ultimately, the reduction in the number of turbines would reduce proposed noise conditions with the Environmental Statement Addendum (ESA) concluding that the predicted residual effects of the proposed development would remain 'not significant'.
 - c. Proposing an amended condition that proves more onerous when the noise conditions are more favourable as a result of the proposed change seems unreasonable and unnecessary;
 - d. The decision notice for planning permission P2014/0825 was issued only in November 2021 including a condition that was proposed by the Council and was discussed and agreed as being acceptable by Pennant Walters. Less than a year later and we are being proposed an alternative condition that would prove contentious to the operation of the wind farm; and
 - e. Fallback position – Pennant Walters has a consent in place for a wind farm at Foel Trawsnant, which could be implemented and would be subject to the current condition on noise.
3. To deal with the final point raised relating to Y Bryn, in the next couple of days we will be sending through a letter from Paul Maile at Eversheds Sutherland (International) LLP providing a legal view on whether we are required to assess emerging proposals at Y Bryn as part of the current Section 73 application.

As discussed in our meeting on Tuesday (27 September), further bat survey work is being undertaken and I will provide an update on progress and when the results will be available, as soon as possible.

In the meantime, could you please confirm if you have received a response from Bridgend on transport.

Many thanks

Meryl