
Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report

Prepared for:

Mynydd Fforch Dwm Wind Energy 2021 Limited

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1. Introduction

1.1. Context

- 1.1.1. This Pre-Application Consultation Report has been prepared on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited to accompany a full planning application for an onshore wind farm and solar array, along with associated works at the Site known as Mynydd Fforch Dwm. The description of development is as follows:

“Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works”

- 1.1.2. This Pre-Application Consultation Report and the consultation process has been undertaken in accordance with the requirements set out under Sections 7, 8, 9 and 11 of The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) (“the DNSPWO”).
- 1.1.3. The legislation requires applicants for Developments of National Significance to undertake Pre-Application Consultation, making available a final draft version of the application for a period of at least 42 days before submitting a planning application to Planning and Environment Decisions Wales (PEDW). The draft application should be made available to statutory and specialist consultees, community consultees and members of the public.
- 1.1.4. The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016 defines Developments of being national significance (for the purposes of section 62D(3) of the 1990 Act) if the development relates to any of the criteria set out in Part 2, Regulation 2(1). The application meets the criteria defined as National Significance and therefore the legislative requirements apply.
- 1.1.5. Having undertaken Pre-Application Consultation, applicants are then required to produce, and submit as part of the application, a Pre-Application Consultation Report which includes particulars of: how the applicant complied with section 61Z of the 1990 Act; any response to the consultation received from persons consulted under section 61Z(3) or (4) of the 1990 Act; and the account taken of those responses.
- 1.1.6. The Pre-Application Consultation Report must also include:

Table 1: PAC report requirements

Requirement	PAC Report Cross-Reference
(a) How the applicant complied with section 61Z of the 1990 Act	This is demonstrated in this report.
(b) Any response to the consultation from any person consulted under section 61Z (3) or (4) of the 1990 Act;	See section 4 and Appendix B of this Report.
(c) The account taken of those responses and including:	

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Requirement	PAC Report Cross-Reference
a. a copy of the notice referred to in article 8(1)(a)(i);	See Appendix A of this Report.
b. a declaration that the notice referred to in article 8(1)(a)(i) was displayed in accordance with the requirements of that article;	This report declares and sets out the actions undertaken in respect of the PAC process.
c. a list of the addresses of the persons who were given notice of the proposed application in accordance with article 8(1)(a)(ii) and a copy of the notice given to such persons;	See Appendix A of this Report.
d. a copy of the publication referred to in article 8(1)(a)(iii);	See section 1 and Appendix A of this Report.
e. a declaration that the applicant has complied with the publication requirements in article 8(1)(b);	See Section 1.
f. copies of all notices given to community consultees, relevant persons and specialist consultees in accordance with articles 9(2) and 9(3);	See Appendix A of this Report.
g. a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 8 and 9(2), including confirmation of whether the issues raised have been addressed and, if so, how; and	See section 4 and 5 of this Report.
h. copies of all responses received from specialist consultees with an explanation of the account taken of each response.	See Appendix B of this Report.

1.1.7. This Pre-Application Consultation Report will provide the particulars and provide evidence of the statutory consultation undertaken in relation to the proposed development of the onshore wind farm and solar array (including associated works)

1.2. The Applicant

1.2.1. Naturalis Energy Developments Limited is a major new force in the UK wind, solar and battery storage sectors and brings together the combines skills, experience and financial resources of REG Power Management (REG) and Renantis.

1.2.2. Since its incorporation in 2005, REG has been dedicated to developing new renewable energy projects to help in the shift to a zero carbon future. To date, REG has developed over 1GW of wind, solar and bioenergy projects in the UK, Poland and Canada, with over 40 projects built in operation today.

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1.2.3. Renantis has been active in the United Kingdom since 2002 and is currently operating an installed capacity of 413 MW. The company has twelve wind farms around the UK from Kilbraur in Sutherland to Cefn Croes in Ceredigion. It pioneered the co-operative ownership approach to wind farm development at its Boyndie Wind Farm and supports local investment, with co-operatives owning a stake in eight of its wind farms. Renantis designs, builds and manages power production plants from renewable sources, with an installed capacity of 1349 MW in the United Kingdom, Italy, United States, Spain, France, Norway and Sweden, using wind and solar power, Waste to Energy and biomass technologies. Renantis is also a global player in the renewable energy technical advisory and asset management services business.

1.3. The Proposed Development

Before PAC

1.3.1. The Applicant is seeking planning permission for an onshore wind farm, together with a solar array, and associated equipment, infrastructure and ancillary works. It is anticipated that the Proposed Development will have a capacity of circa 35 MW based upon the candidate turbine. The MW output is subject to change as the efficiency of turbines increase, but the physical parameters of the application will not.

1.3.2. The Proposed Development comprises the following:

- up to seven wind turbines (up to 220m to tip);
- up to approximately 10 hectares of solar PV panels, mounted on frames fixed to the ground, with associated inverters, security fencing and CCTV system;
- wind turbine foundations;
- external transformer housing;
- crane pads/wind turbine laydown areas;
- access tracks, entrance and turning points;
- replacement bridge over Nant Blaen Pelenna;
- a substation and control building;
- underground electricity cables between the wind turbines and solar array and the onsite substation; and
- temporary construction and storage compounds and ancillary infrastructure.

1.3.3. As per table 2 below, the seven turbines were proposed as follows:

Table 2: Wind turbine layout consulted upon

Wind Turbine ID	Easting	Northing	Maximum Tip height (m)	Indicative rotor diameter (m)	Indicative hub height (m)
1	281131	197711	180	150	105
2	280820	197190	165	150	190
3	280629	197599	180	150	105
4	283088	197744	220	150	145

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Wind Turbine ID	Easting	Northing	Maximum Tip height (m)	Indicative rotor diameter (m)	Indicative hub height (m)
5	282628	198074	220	150	145
6	282522	197493	200	150	125
7	282036	197830	200	150	125

After PAC

1.3.4. Noting the consultation responses received as part of the Pre-Application Consultation process, and documented in this report, the applicant has altered the Proposed Development in response to the comments received. The changes can be summarised as per:

- Reduction from seven turbines to six (omitting previously titled turbine 2);
- Replacing the 220m to tip turbines with 200m to tip turbines; and
- Changes to the configuration of the solar array.

1.3.5. As per table 3 below, the six turbines are now proposed as per:

Table 3: Wind turbine layout proposed

Wind Turbine ID	Easting	Northing	Maximum Tip height (m)	Indicative rotor diameter (m)	Indicative hub height (m)
1	281131	197711	180	150	105
2	280629	197599	180	150	105
3	283088	197744	200	150	125
4	282628	198074	200	150	125
5	282522	197493	200	150	125
6	282036	197830	200	150	125

1.3.6. As this PAC report will demonstrate, the applicant has had regard to the feedback obtained from statutory consultees, non-statutory consultees and members of the public and has amended the scheme in a proportionate matter.

1.4. Statutory consultation

- 1.4.1. The Proposed Development was subject to an extended period of statutory pre-application consultation for 49 days from 5th December 2022 to 23rd January 2023. Details of the statutory notices can be found in Appendix A. The period of statutory consultation was extended from six to seven weeks to take account of the Christmas holiday period (which the applicant discussed with PEDW) and comments raised during the informal consultation beforehand (where additional time was requested by local stakeholders).
- 1.4.2. The applicant continued to welcome and record consultee responses up to 31st January from non-specialist consultees and awaited receipt of responses from specialist consultees before preparing this report and submitting the application.
- 1.4.3. As this report demonstrates, the baseline consultation requirements for notification and the provision of information were supplemented by broader public engagement and consultation. Therefore, in addition to the statutory notifications with the specialist and community consultees via letter, site notice, and newspaper notice, the local community was notified of the consultation and invited to participate via a number of different mediums, including social media and posted leaflets.

1.5. Non-statutory public consultation

Virtual Village Hall

- 1.5.1. Following the commencement of statutory public consultation on 5th December, the applicant organised and advertised an online webinar (or Virtual Village Hall) event for interested parties to attend. This event was held the evening before the planned public consultation event, which is noted below. The Virtual Village Hall started at 7:00pm and lasted for one hour. The event comprised of a project overview by the applicant before then taking questions from any parties present. The questions asked were either answered during the event or taken away and added to the FAQ page (see Appendix C).

15th December 2022

- 1.5.2. Following the Virtual Village Hall, the applicant then organised two open door public consultation events on 15th December. These were held : 1) in the Little Theatre in Neath from 10:00am until 2:00pm and 2) in Tonmawr Rugby Club from 4:00pm until 8:00pm. These locations were chosen in consultation with the local Ward Councillor as 1) the route to Site passes through Neath and past the Little Theatre so it was considered an appropriate location to invite interested parties in that location and 2) the project is located to the North of Tonmawr (as the nearest settlement) and construction vehicles will use the road through the village.
- 1.5.3. Both sessions included a range of specialists from the project team including, the project manager, planner, landscape consultant, transport consultant, public relations consultants and other members of the applicant's team. The landscape and transport consultant were invited as the applicant considered that landscape and transport were the main matters discussed with members of the public during the informal consultation process.

- 1.5.4. With regards to material available, each session included circa eight banners (measuring circa 2.0m high by 0.5m wide) that presented information on the scheme to interested parties. These were supplemented by a number of key photomontages of the proposed development and other application drawings. Alongside this, the applicant had printed copies of both the Non-Technical Summary and the Collaborative Benefits Report (to reflect some of the key messages during the information consultation process. The applicant also had a number of monitors available so that other project documents could be accessed, if required. The monitors were also used to give interested parties an interactive view of the proposed development using Google Earth Ground level view with turbine models integrated into the software.
- 1.5.5. Details of the attendance at both events on 15th December 2022 are available in the Consultation Report provided by Quatro. The FAQ document, in Appendix C, outlines some of the questions received from interested parties at both events – however, this isn't meant to be a record of matters discussed and all parties were invited to send feedback forms to the applicant.

18th January 2023

- 1.5.6. Following on from the events on 15th December 2022, the applicant, in consultation with local representatives, including Jeremy Miles MS, felt it appropriate to organise another event on 18th January 2023. This event took the feedback from the event on 15th December 2022, which saw further specialists from the project team attend to answer questions, including the project manager, planner, ecological and ornithological consultant, construction manager, hydrology, hydrogeology and peat consultant and other members of the applicant's team.
- 1.5.7. The event on 18th January 2023 was held in Tonmawr Rugby Club and ran from 4:00pm to 8:00pm. An event was not hosted at the Little Theatre in Neath as the post-event review of the session on 15th December 2022 found that attendees were predominantly living in Tonmawr attending that event and attended both sessions.
- 1.5.8. As noted, the applicant had organised for a number of specialists to be present on 18th January 2023 to field questions from interested parties. However, this format was curtailed at circa 6:00pm following input from a Community Action Group. The event then took on the form of a town hall (i.e. series of Q&A), rather than the parallel conversations that had taken place previously.
- 1.5.9. However, the town hall format did include input from most of the specialists in attendance and was considered to be useful to all who attended. The FAQ were updated following this event and details of responses received from non-specialist consultees are noted in Section 3 of this report. Again, the event included the material provided at the events on 15th December, including banners, print outs, monitors etc.

19th January 2023

- 1.5.10. On 19th January 2023, the applicant attended a meeting with Pelenna Community Council. At the developer's request, ahead of the meeting, the Community Council circulated a number of questions which the applicant responded to and provided ahead of the meeting. However, it was noted that that not all parties present had found an opportunity to review the questions. As such, the Q&A document, which can be found in Appendix C, was used for reference and follow up.

- 1.5.11. The meeting with the Community Council comprised of the applicant's project team and community councillors and both local Ward Councillors. The Community Council agreed that following the public event the day before, that it would not be appropriate to invite members of the public to this meeting.
- 1.5.12. Following the meeting, the Community Council then composed their written response to the statutory consultation, which can be found in Appendix B.
- 1.5.13. Further information is available in the Consultation Report prepared by Quatro and submitted with the application.

1.6. Project website

- 1.6.1. A project website was created to provide information about the scheme to the public. This is available to view at <https://mfdwindfarm.co.uk/> and contained information about the proposed development – which has been updated as the project has progressed. The website also includes details about how to contact the project team with any queries or feedback. Visitors to the website were able to register their interest in the proposed development and request to be updated through the lifetime of the proposed development.

1.7. FAQ

- 1.7.1. A proposed development FAQ document was produced in December 2022 to provide interested parties with answers to Frequently Asked Questions about the proposed development. The FAQ document is available on the website and in Appendix C and was updated throughout and following the formal consultation period.

2. Consultees

2.1. Overview

2.1.1. Section 9 of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) ("the DNSPWO") sets out that relevant statutory consultees are separated into three categories for the purposes of section 61Z(4) of the Town & Country Planning Act 1990 ("the 1990 Act"): community consultees, specialist consultees and relevant persons.

2.1.2. The following statutory consultees were identified, and subsequently engaged through the statutory consultation period.

2.2. Specialist consultees

2.2.1. In line with Schedule 5 of the DNSPWO, the below Specialist Consultees were identified. Letters notifying of the start of the statutory consultation period, including a copy of the Schedule 2 Notice was issued to the following specialist consultees. A copy is included in Appendix A.

Table 2: List of specialist consultees

Consultee	Reason for inclusion
Welsh Ministers (with regard to highways)	Paragraph (c) of Schedule 5 of the DNSPWO
Natural Resources Wales	Paragraph (n) of Schedule 5 of the DNSPWO
Neath Port Talbot Highways Authority	Paragraph (d) of Schedule 5 of the DNSPWO
Mid and West Wales Fire & Rescue Service	Added to the DNSPWO on 1 st November 2021
Cadw	Paragraph (h) of Schedule 5 of the DNSPWO
Health And Safety Executive	Paragraph (a) of Schedule 5 of the DNSPWO
The Coal Authority	Paragraph (f) of Schedule 5 of the DNSPWO

2.3. Community consultees

2.3.1. The DNSPWO states that community consultees are: each councillor representing each ward in the county or county borough council in which the site is situated; and the community council in which the site is situated. Letters notifying of the start of the statutory consultation period, including a copy of the Schedule 1 notice was issued to the following identified community consultees, a copy of which is included in Appendix A.

Table 3: list of community consultees

Consultee	Reason for inclusion
Cllr Tim Bowen	Ward member
Cllr Jeremy Hurley	Ward member
Pelenna Community Council	The Site is within this ward

- 2.3.2. Whilst not within the Site, the two community councils noted below were consulted as they border the application site.

Table 4: other community consultees

Consultee	Reason for inclusion
Resolven Community Council	Ward boundary is adjacent to the Site
Tonna Community Council	Ward boundary is adjacent to the Site

- 2.3.3. As noted in Table 7, responses were received from Cllr Jordan of Neath South, Cllr Lewis of Resolven & Tonna and Dr Altaf Hussain MS for South Wales West and deputy whip and shadow minister for equalities. Their comments and the applicant's response are noted in Table 7. The applicant contacted Dr Altaf Hussain MS prior to the Pre-Application Consultation process to discuss his comments received at the time but, at the time of writing, no response had been received from him or his office. The applicant has not responded directly to Dr Altaf Hussain MS comments received during the PAC process, but they are noted below.

2.4. Landowners

- 2.4.1. As required, letters and a copy of the Schedule 1 Notice were sent to all relevant adjacent landowners to inform them of the start of statutory consultation. A copy of the letter and notice can be found in **Appendix A**.
- 2.4.2. In addition to the relevant landowners, i.e. those adjacent to the Site, the applicant also consulted a number of other residential properties in proximity to the Site. These properties were identified in consultation with Neath Port Talbot Council and mimicked who the Council would contact if there were to receive an application for the same site area. A copy of this letter is included in Appendix A.

2.5. Other consultees

- 2.5.1. In addition to the consultees identified above, other relevant parties were consulted. Whilst these parties are not included in the scope of Schedule 5 of the DNS Order 2016, due to the nature and position of the Site it was thought that additional stakeholders should be consulted. Again, letters notifying the consultees of the start of the statutory consultation period, including a copy of the Schedule 1 notice were issued to the Land Quality Advisory Service at the Welsh Government.

3. Publicity

3.1. Introduction

- 3.1.1. This section details how the Pre-Application Consultation was undertaken with reference to the legislative requirements.

3.2. Statutory publicity

- 3.2.1. In line with the DNSPWO, the applicant is required to carry out pre-application consultation. Sections 8 and 9 of the Order stipulates the requirement in terms of scope, engagement and length of the consultation period. The consultation period began on 5th December 2022 and ran for 49 days until 23rd January 2023 – exceeding the 42 day minimum requirement. Where requested, extensions to this timeframe were agreed with individual consultees.
- 3.2.2. In addition to the statutory publicity, a number of non-statutory consultation and engagement methods were employed to ensure that the local community and interested parties had the opportunity to find out about and contribute to the consultation. A full summary of the non-statutory consultation is set out in section 1.5.
- 3.2.3. A table outlining compliance with the DNSPWO sections 8 and 9 is set out below:

Table 5: Consultation requirements

Requirement, as set out in referenced section of DNSPWO	Declaration of compliance / reference within this report.
Publicity before applying for planning permission	
The applicant must publicise the proposed application by— (a) giving requisite notice—	
(i) by site display in at least one place on or near the land to which the proposed application relates for not less than 42 days;	Section 3.3 Appendix A
(ii) in writing to any owner or occupier of any land adjoining the land to which the proposed application relates: and	Section 3.4 Appendix A
(iii) by publication of the notice in a newspaper circulating in the locality in which the land to which the proposed application relates is situated; and	Section 3.5 Appendix A
(b) publishing the following information on a website maintained by the applicant, for not less than 42 days beginning with each day on which each of the notices referred to in subparagraph (a) or article 9(2) are given—	Section 3.6 Appendix A

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Requirement, as set out in referenced section of DNSPWO	Declaration of compliance / reference within this report.
(i) the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form; (ii) a plan which identifies the land to which the proposed application relates; (iii) any other plans, drawings and information necessary to describe the development which is the subject of the proposed application; (iv) a copy of the notice required by article 6 which has not lapsed under paragraph (3) of that article; (v) the design and access statement required by article 14; (vi) subject to article 12(3), the particulars or evidence required by the Welsh Ministers under section 62(3) of the 1990 Act (applications for planning permission)(1); (vii) where applicable, a statement referred to as the environmental statement for the proposed development; and (viii) a written statement about any secondary consent(2) connected with the proposed application(3) in respect of which the applicant considers a decision on that consent is to be made or should be made by the Welsh Ministers, together with the draft application form and documents associated with such consents.	
(2) The applicant must have complied with paragraph (1) before an application is submitted.	The actions noted in this report confirm that the applicant has complied with paragraph (1) prior to submission.
(3) Any plans or drawings required to be provided by paragraph (1)(b)(ii) or (iii) must be drawn to a scale identified by the applicant and, in the case of plans, must show the direction of north.	All plans and drawings provided were drawn to a scale identified by the applicant and showed the direction of north.
(4) Where the notice referred to in paragraph (1)(a)(i) is, without any fault or intention of the applicant, removed, obscured or defaced before the period of 42 days has elapsed, the applicant will be treated as having complied with the requirements of the relevant paragraph if they have taken reasonable steps to protect the notice and, if need be, replace it.	Site notices were checked on two occasions during the consultation period.

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Requirement, as set out in referenced section of DNSPWO	Declaration of compliance / reference within this report.
(5) In this article, “requisite notice” (“ <i>hysbysiad gofynnol</i> ”) means notice in the appropriate form set out in Schedule 1 or in a form substantially to the like effect.	Appendix A
Consultation before applying for planning permission	
(1) The following persons or descriptions of persons are specified for the purposes of section 61Z(4) of the 1990 Act— (a) any community consultee; (b) any specialist consultee; and (c) any relevant person(1).	Section 2.2 & 2.3 Appendix A
(2) Where an applicant is required to consult a community consultee or a relevant person, the applicant must give the community consultee or the relevant person requisite notice in writing of the proposed application.	Section 2.2 & 2.3 Appendix A
(3) Where an applicant is required to consult a specialist consultee, the applicant must give the specialist consultee requisite notice in writing of the proposed application and enclose each of the documents referred to in article 8(1)(b) or provide a link to a website on which those documents can be found.	Section 2.2 A link to the consultation website, which contained all of the required documents, was provided in the required format. Appendix A
(4) The applicant must have complied with paragraphs (2) and (3) and have given the specialist consultee time to respond in accordance with article 10(1) before an application is submitted.	The applicant provided 49 days for consultation (5th December 2022 to 23 rd January 2023).
(5) In this article, “requisite notice” (“ <i>hysbysiad gofynnol</i> ”) means— a) in relation to a community consultee or a relevant person notice in the appropriate form set out in Schedule 1; and (b) in relation to a specialist consultee notice in the appropriate form set out in Schedule 2,	Section 2.3

3.3. Site notice

- 3.3.1. In line with article 8(i) of the DNSPWO, the applicant displayed site notices on or near the land to which the application related for 49 days from 5th December 2022 to 23rd January 2023. Notices were placed on or near access points to the Site and along the road network accessing the Site. A copy of the notice, a map of where they were located and photographs of the notices in situ are included in Appendix A. The site notices were checked during the consultation period and were found to be in situ.

3.4. Written notice

- 3.4.1. As noted previously, written notice were issued to all statutory consultees, including adjacent landowners for the Site. This was supplemented by a list of addresses provided by Neath Port Talbot Council.

3.5. Newspaper notice

- 3.5.1. As required, a notice was published in a locally circulating newspaper on 5th December 2022. The notice appeared on page 37 of the South Wales Evening Post, which has a circulation that covers the Site and surrounding areas. A copy of the notice and the newspaper page it appeared on can be found in Appendix A.

3.6. Website

- 3.6.1. A project website was developed and updated for the consultation period. The website (www.mfdwindfarm.co.uk) contained a consultation library where the documents could be accessed. All relevant and required documents were uploaded to the website and available to view and/or download from the beginning of the statutory consultation period (5th December 2022). All draft application documents and relevant consultation materials were still available online up to the point of submission of the application to PEDW. This report should be taken as a declaration that the relevant documents were published on the website for the consultation period.

3.7. Non-statutory publicity

- 3.7.1. As noted in section 1.5 of this report, additional non-statutory publicity and consultation was carried out as part of the formal consultation process.

3.8. Public Notification

- 3.8.1. Part 2, Paragraph 8(1) (A) of the DNSPWO states that the applicant must publicise the proposed application by:

8.—(1) The applicant must publicise the proposed application by—

(a) giving requisite notice—

(i) by site display in at least one place on or near the land to which the proposed application relates for not less than 42 days;

(ii) in writing to any owner or occupier of any land adjoining the land to which the proposed application relates: and

(iii) by publication of the notice in a newspaper circulating in the locality in which the land to which the proposed application relates is situated; and

(b) publishing the following information on a website maintained by the applicant, for not less than 42 days beginning with each day on which each of the notices referred to in subparagraph (a) or article 9(2) are given—

(i) the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form;

(ii) a plan which identifies the land to which the proposed application relates;

(iii) any other plans, drawings and information necessary to describe the development which is the subject of the proposed application;

(iv) a copy of the notice required by article 6 which has not lapsed under paragraph (3) of that article;

(v) the design and access statement required by article 14;

(vi) subject to article 12(3), the particulars or evidence required by the Welsh Ministers under section 62(3) of the 1990 Act (applications for planning permission)(1);

(vii) where applicable, a statement referred to as the environmental statement for the proposed development; and

(viii) a written statement about any secondary consent(2) connected with the proposed application(3) in respect of which the applicant considers a decision on that consent is to be made or should be made by the Welsh Ministers, together with the draft application form and documents associated with such consents.

(2) The applicant must have complied with paragraph (1) before an application is submitted.

(3) Any plans or drawings required to be provided by paragraph (1)(b)(ii) or (iii) must be drawn to a scale identified by the applicant and, in the case of plans, must show the direction of north.

(4) Where the notice referred to in paragraph (1)(a)(i) is, without any fault or intention of the applicant, removed, obscured or defaced before the period of 42 days has elapsed, the applicant will be treated as having complied with the requirements of the relevant paragraph if they have taken reasonable steps to protect the notice and, if need be, replace it.

(5) In this article, “requisite notice” (“hysbysiad gofynnol”) means notice in the appropriate form set out in Schedule 1 or in a form substantially to the like effect.

3.8.2. A Land Registry search was undertaken to determine a list of owners and occupiers of adjoining land and buildings. The adjoining neighbours of the land were written to, as required by the legislation. A list of surrounding land owners to which owner/occupier letters were sent to is included as **Appendix A**.

3.8.3. A copy of the cover letter sent to the owners of adjoining land is included as **Appendix A**. A copy of the notice sent through is included at **Appendix A**. The letters and notices were posted on 2nd December 2022 with the PAC period formally starting on 5th December 2022 and running until 23rd January 2023.

3.8.4. Site notices were displayed close to the application site on 5th December 2022. A total of six notices were displayed. A copy of the notice is included in **Appendix A**. This report and the content there should be taken as a declaration confirming that the site notice was displayed in accordance with the statutory requirements and a series of photos of the site notices in place.

3.9. Publication of the Draft Planning Application

3.9.1. Part 2, Paragraph 8(1)(b) of the DNSPWO states that the applicant must publicise the proposed application by publishing the information on a website maintained by the applicant, for not less than 42 days beginning with each day on which each of the notices referred to in subparagraph (a) or article 9(2) are given:

- the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form;
- a plan which identifies the land to which the proposed application relates;
- any other plans, drawings and information necessary to describe the development which is the subject of the proposed application;
- a copy of the notice required by article 6 which has not lapsed under paragraph (3) of that article;
- the design and access statement required by article 14;
- subject to article 12(3), the particulars or evidence required by the Welsh Ministers under section 62(3) of the 1990 Act (applications for planning permission);
- where applicable, a statement referred to as the environmental statement for the proposed development; and
- a written statement about any secondary consent connected with the proposed application in respect of which the applicant considers a decision on that consent is to be made or should be made by the Welsh Ministers, together with the draft application form and documents associated with such consents.

3.9.2. A full online copy of the draft planning application was made available on a hosted Naturalis webpage for the duration of the 49-day consultation. Even though the consultation has now closed, the website can still be viewed here and has remained viewable beyond the end of the statutory 42-day period:

<https://mfdwindfarm.co.uk/consultation-library/>

3.9.3. The notice letters to owners / occupiers of adjoining land, letters to Community Consultees, letters to Specialist Consultees and the site notices stated that copies could be inspected online at: <https://mfdwindfarm.co.uk/consultation-library/> or at the nearest computer facilities which were by visiting Cwmafan Library, Depot Road, Port Talbot, SA12 9DF or Neath Library, 35 Victoria Gardens, Neath, SA11 3BA.

3.9.4. All of the notices provided the email address to which any comments should be sent directly to: hello@mfdwindfarm.co.uk.

3.10. Pre-application Consultation Reports

- 3.10.1. Part 2, Paragraph 11 of the DNSPWO states that where an applicant submits an application to the Welsh Ministers in accordance with article 12, that applications must be accompanied by a pre-application consultation report which gives particulars of:

Table 6: PAC report requirements

Requirement	PAC Report Cross-Reference
(a) How the applicant complied with section 61Z of the 1990 Act	This is demonstrated in this report.
(b) Any response to the consultation from any person consulted under section 61Z (3) or (4) of the 1990 Act;	See section 5 and Appendix A of this Report.
(c) The account taken of those responses and including:	
a. a copy of the notice referred to in article 8(1)(a)(i);	See Appendix A of this Report.
b. a declaration that the notice referred to in article 8(1)(a)(i) was displayed in accordance with the requirements of that article;	See Appendix A of this Report.
c. a list of the addresses of the persons who were given notice of the proposed application in accordance with article 8(1)(a)(ii) and a copy of the notice given to such persons;	See Appendix A of this Report.
d. a copy of the publication referred to in article 8(1)(a)(iii);	See section 3 and Appendix A and 5 of this Report.
e. a declaration that the applicant has complied with the publication requirements in article 8(1)(b);	See Section 4.
f. copies of all notices given to community consultees, relevant persons and specialist consultees in accordance with articles 9(2) and 9(3);	See Appendix A of this Report.
g. a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 8 and 9(2), including confirmation of whether the issues raised have been addressed and, if so, how; and	See Section 4 and 5.
h. copies of all responses received from specialist consultees with an explanation of the account taken of each response.	See Appendix B of this Report.

4. Response

4.1. Introduction

- 4.1.1. The following table sets out the responses received from all statutory consultees, as well as community consultees and non-statutory consultees, along with the Applicant's response to the issues raised. A copy of full responses from specialist consultees is included at **Appendix B**.

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Table 7: PAC responses

Consultee	Summary of Response	Applicant's response
Specialist Consultees		
Cadw	Request for further information. Agree with our conclusion that apart from the Cwm Pelenna Colliery Ventilation Furnace and listed building Cwm Pelenna Ventilation stack, there will be no significant effect on any other designated historic assets or their setting. Details, including construction method, of floating road to mitigate impacts to scheduled monument to be provided. Scheduled monument consent application also required, including a Heritage Impact Assessment (which will assess any impact to the listed building Cwm Pelenna Ventilation Stack). Suggest that we liaise with the Glamorgan Gwent Archaeological Trust.	Noted. Noted – useful to focus attention on the two historic assets identified. This will be provided as part of the application to PEDW. The applicant is conscious of this and is considering the timing of any such application. The applicant has engaged with GGAT as part of this process – see their correspondence below.
Coal Authority	The likely Coal Authority recommendation would be no objections. The submitted Coal Mining Risk Assessment is sufficient to accompany any subsequent future planning application to meet the requirements of National policy. The report does not appear to consider the thick coal seam outcrops within the Site, but confirms that the site is stable from a mining perspective.	Noted. Noted and agreed. Noted and agreed.

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Consultee	Summary of Response	Applicant's response
Health and Safety Executive	HSEs response is the same as advised in October 2022. The proposed development does not currently fall within the consultation distance of any major hazard installations or major accident hazard pipelines. There are no licensed explosive sites in the vicinity.	Noted. Noted and agreed. Noted and agreed.
Mid and West Wales Fire Authority	Access and facilities for the Fire & Rescue Service in accordance with Approved Document B (Wales) 2020, B5, Section 16 Fire mains & hydrants & Section 17 vehicle access. The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site. The applicant should contact the Local Authority Building Control Department when determining issues concerning means of warning and escape, internal fire spread, external fire spread, access and facilities for the Fire & Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).	Noted.
Neath Port Talbot Engineering & Transport	No objection (subject to any specified conditions). An abnormal load trial run will be required following approval of the application and prior to development commencing.	Noted. The applicant has agreed to undertake a trial run following any approval but prior to construction traffic movements, which will utilise a similarly configured lorry to the blade lifter.

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Consultee	Summary of Response	Applicant's response
Neath Port Talbot Engineering & Transport	Prior to any works starting, a statement regarding the delivery times and schedules for abnormal load and construction traffic is required, and should be adhered to throughout the lifetime of the project. Prior to any works starting, a traffic management scheme that details any alternations/amendments to the existing public highway – to include all highway works necessary to allow the safe access of the turbine delivery vehicles and construction traffic – must be submitted. The highway works and any amendments shall be reinstated back to its original state on completion of the development. Any substantial constructions works or highway alternations required along the public highway will be subject to a road safety audit. Prior to works starting, a reinstatement management plan for any landscaping and earth reinstatement shall be submitted. A management and maintenance regime shall be provided and should include details of ongoing maintenance post construction and any security measures. Prior to works starting, a construction method statement shall be submitted and include details required by the authority. A condition survey of the existing highway network along the proposed access route for the deliveries shall be undertaken and include the condition of the existing carriageway and footway. Any damage to the public highway identified as a result of the increased volume of construction vehicles shall be repaired in accordance with a scheme to be agreed.	Noted. Noted – albeit the trigger on this condition could be prior to deliveries commencing. Noted. Noted. Noted. Noted. Noted. Noted.

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Consultee	Summary of Response	Applicant's response
Neath Port Talbot Engineering & Transport	SWTRA should be consulted as the delivery route is along their network. SAB approval will be required prior to any work commencing. Adequate provision shall be made for the drainage of the Site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the lifetime and/or phasing of construction.	The applicant has engaged with SWTRA as part of this process – see below. Noted and agreed. Noted.
NRW	Additional information required in respect of fisheries, landscape and ornithology. Replacement of the bridge structure has the risk of compromising the benefits currently being derived from recent enhancements in this location. Whilst not opposed to a replacement bridge, NRW would require the bridge to be a 'free span' bridge and elements of the 'nature like' fishway retained. NRW agree with the findings of the ES and consider that there would be no significant adverse effects on the Brecon Beacons National Park and Gower Area of Outstanding Nature Beauty as a result of the development. NRW agree with the assessment that negligible effects on the dark skies of the Brecon Beacons National Park would occur, with no effects on Dark Sky Discovery Sites.	Noted – see additional comments below. The applicant is liaising with NRW on this matter and propose to align with the principles set out e.g. 'free span' bridge and retain 'nature like' fishway. Noted. Noted.

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Consultee	Summary of Response	Applicant's response
NRW	NRW seek clarification of what the lights in the foreground of viewpoint 13 represent, noting that there is no development shown in the view in the daylight image from the same viewpoint. NRW request justification as to why the winter walkover surveys were not undertaken on Mynydd Blaenavon.	At the scoping stage, NRW suggested an alternative location for view point 13 as referenced here. Given relatively limited visibility in this area, we photographed both locations for the daytime view so that we could evaluate which was best and used the location suggested by NRW. However the night-time photography was only taken from one of the two locations – the originally proposed viewpoint 13. That viewpoint is close to a campsite and the lights in the foreground are in the campsite. The omission of the second photograph was only discovered after the photographer has completed their work and in view of the cost of returning for one night viewpoint and the difference between the two locations it was judged best to use the photograph already obtained. Had the night photograph been taken from the Comin y Rhos location, it would have probably included some lights in the property seen to the right of the view, and may have shown one aviation light just above the forestry on the skyline as illustrated by the wireline provided showing the lights visible from that location. As indicated by NRW, using the alternative viewpoint would not have altered the night-time assessment outcomes In the absence of Welsh-specific guidance, ornithology surveys have been undertaken in accordance with NatureScot guidance (SNH, 2017) guidance. This guidance considers that winter walkover surveys (particularly for migratory waterfowl; geese/swans) need only be considered in instances where the Site lies within known goose feeding areas (which is specific to Scotland), or where the Site is located within the core foraging distance of the SPAs for these species (taken from NatureScot guidance; SNH, 2016), or other major roosts, unless it

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Consultee	Summary of Response	Applicant's response
NRW	NRW request clarification as to whether later start times to the moorland breeding bird surveys affected the results under "field survey limitations". NRW note that table 3.3: breeding territories within the moorland breeding bird survey area has 'x' under the 2021 column with vales. Can this value be confirmed?	can be established from existing data that the area is not utilised for feeding. The Site is not located within the core foraging distance of such SPA (nor were any major roost sites identified from the baseline gathering). Furthermore, the habitats present within the Site and the undulating topography of the Site (and habitats surrounding the Site – principally commercial forestry) are identified as unsuitable to support aggregations of wetland birds, like migratory geese and swans. As such, specific winter walkover surveys were not undertaken. Vantage Point flight activity surveys did however cover the winter period, when target species activity (which included wetland species) through Site was recorded. Subsequently surveys have been undertaken in accordance with best-practice guidance. MBBS methodology in accordance with NatureScot guidance (SNH, 2017) is carried out throughout daylight hours, with no requirement to start all surveys at dawn. This is largely due to the 'target species' for MBBS (breeding wetland birds) who's activity and behaviour isn't associated with the dawn chorus (like for example passerine activity is, which are not target species for survey, as it is generally considered that passerines are not significantly impacted by wind farms; as stated in SNH, 2017). The MBBS were carried out across the daylight period in the breeding season in Year 1, and followed NatureScot guidance (SNH, 2017), so a robust picture of the breeding bird assemblage onsite was determined, and no limitations considered based on the timings of MBBS in Year 1. Subsequently surveys have been undertaken in accordance with best-practice guidance. The following text is the paragraph 3.26 above Table 3.3: "In 2021 (Year 2) passerines were not recorded in sufficient detail for territory mapping to be carried out, given NatureScot (2017) guidance states that passerine species are not significantly impacted by wind

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Consultee	Summary of Response	Applicant's response
NRW	NRW are satisfied that the surveyed locations for bats are representative of the habitats at the turbine locations. NRW recommend that the site is subject to post-construction bat activity monitoring from the outset of the operation phase to assess any changes in bat activity over prolonged periods such that the level of risk posed increases above the currently assessed low risk, and therefore to indicate whether turbine curtailment may be needed. NRW agree that curtailment is not needed from the outset of the operation of the proposed development. However, it must remain an option for the duration of the operational lifetime. NRW indicate that the applicant should include the specifics of when idling will apply.	farm developments, so surveys for lowland and farmland passerines is generally not required. For Year 2, a cross ('x') is shown in Table 3.3 if the species was recorded during those surveys ('0' if not recorded as breeding)". If any clarity is required, 'x' signifies that the species was present/breeding and '0' meant the species was not recorded as breeding. Note, Table 3.3 listed those (mainly) passerine species recorded during surveys which as stated above (and in accordance with NatureScot guidance; SNH, 2017) are not treated as target species for MBBS, but this additional information is provided as a precaution within the Appendix and is not relevant to assessment within the chapter. Noted. Noted. Noted. Noted.

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Consultee	Summary of Response	Applicant's response
NRW	Both curtailment and idling could be managed through the use of appropriately worded conditions (which NRW have drafted in their response). NRW advise that the local planning authority will lead on matters in relation to peat, albeit NRW wish to advise the local planning authority that the Peatland Management Plan states that thin peat is classified as 0.5-1.5m deep, which is in fact deep peat. Thin or shallow peat would be 0.1-0.49m peat. Chapter 11 of the ES needs to note the distinction between natural ground water spring; and mine water spring discharges. Recommend that the Coal Authority are consulted. Note the inclusion of the CEMP and its comments and will provide comments when submitted as part of the planning application. The proposed development does not appear to impact the fluvial floodplain and the turbines are located in DAM zone A, in accordance with TAN15. Therefore we have no further comments. The proposed replacement bridge will be over the Nant Blaen Pelenna and an ordinary watercourse consented will be required and considered by Neath Port Talbot Council.	Noted and agreed. The applicant is engaging with the local planning authority, and others, and note NRW's assertion that the local planning authority are the lead on this topic. Noted and an update will be included. The applicant has engaged with the Coal Authority as part of this process – see above. Noted. Noted and agreed. Noted and agreed.
Welsh Government Highways Department	The applicant should identify and provide full details of all accommodation works required on the trunk road network.	The applicant considers that all the information can be provided or conditioned as part of any approval. The applicant has responded to the consultee with suggested conditions.

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Consultee	Summary of Response	Applicant's response
Welsh Government Highways Department	The applicant is advised that they will be required to enter into a S278 agreement. The applicant will be required to submit a Transport Assessment. The applicant is required to submit a Construction Traffic Management Plan which shall contain details of all required Abnormal Indivisible Load movements. The applicant is advised that the Welsh Government wish to be consulted regarding environmental impacts on the Strategic Road Network and associated soft estate during design development and the Environmental Statement.	As per the above. As per the above. As per the above. As per the above.
Community Consultees		
Pelenna Community Council	The Community Council is in close contact with the residents of the Pelenna Community and it appears that a majority of residents are against the proposed development. A specific concern is the children's play area at Johns Terrace, Tonmawr. It is understood that road movements associated with the construction of the proposed development could put the play area at risk and the safety of children using the facility.	Noted. However, the applicant's consultation report provides detail of responses received from residents – with 64% of respondents strongly agreeing with the principle of building a wind at Mynydd Fforch Dwm. In developing the Proposed Development, the applicant has had regard to the proximity of development to buildings and uses, including the play area at Johns Terrace. One of the key early decisions, was to construct a new access road onto Mynydd Blaenavon, therefore taking the vehicle movements further away from residential properties and the play area. If approved, vehicle movements would be closely monitored and appropriate risk assessments and precautionary measures adopted, as outlined in the Construction Environmental Management Plan.

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Consultee	Summary of Response	Applicant's response
Pelenna Community Council	The peat present on Site must not be damaged by the proposed development. Concern that any excavated peat would be retained on site and could pose a danger to residents. Protected species and other wildlife should be protected. Historical features should be protected. Concern around the timing and duration of any Abnormal Indivisible Load movements.	In discussion with Neath Port Talbot Council, the Lost Peatlands project and the Welsh Government's Land Quality Advisory Service, the applicant is revising their approach to peat to include for more restoration and integration with the Outline Habitat Management Plan. Where any peat is excavated, it is best practice to retain it on site and reuse it – thereby limiting any degradation. The peat would be stored and reused in line with industry standards, which would be reviewed by Neath Port Talbot Council. The applicant has undertaken a suite of desktop studies, surveys and assessment work – as well as engagement with statutory and non-statutory bodies – to protect the habitats and species that are present on Site. Moreover, DNS applications such as this are required to include biodiversity net benefit – which is manifested in the proposed enhancement of two SINCS, as noted in the Outline Habitat Management Plan. The applicant has been in regular contact with both Cadw and Glamorgan and Gwent Archaeological Trust to ensure that impacts to historic features are understood. Furthermore, the applicant is aware of the local interest in the scribed rocks along Fforch Dwm road and will work with the local community (?) to carefully manage these local non-designated features. Within the Transport Management Plan, the applicant has set out how it intends to transport the Abnormal Indivisible Loads to site. The applicant is working with both the Welsh Government's and Neath Port Talbot Council's highway departments to agree these proposals.

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Consultee	Summary of Response	Applicant's response
Pelenna Community Council	Concern in respect of access to emergency services during AIL transit and ability to enter and leave properties/the village. Concern in respect of any disruption to power supply and other utility services. Other concerns in respect of: noise; shadow flicker; local ecosystem; property value.	The applicant will ensure that the community council and local residents are kept updated on this matter as the project progresses. The Transport Management Plan includes a specific section on such a scenario. The Abnormal Indivisible Load will be accompanied by a police escort that will be in constant contact with the emergency service contact centre to be notified if any blue light services need to travel along the same route. If access is required the police escort will remove the vehicles from the road to allow safe and quick passage for the blue light service. Services shouldn't be affected. Where cables need to be dropped this will be done in consultation with the local network operator to minimise disruption and ensure continuity of supply Please refer to the Pelenna Community Council questions and the Applicant's responses found in Appendix C.
Cllr Jeremy Hurley	Conscious of the effect that additional vehicle movements will have to roads that already experience considerable delays in morning and evening traffic. Concern as to the surveys undertaken to date and the information collected and presented within the ES. This baseline data then influences the assessment within the ES.	The applicant has set out in the Transport Management Plan how they propose to coordinate vehicle movements to ensure the least possible impact to the road network i.e. by avoiding peak traffic hours. The surveys undertaken have been done in line with the relevant legislation and guidance and by professionals. These surveys have also been reviewed by NRW and Neath Port Talbot Council, amongst others. The applicant is aware that one of the traffic surveys undertaken includes data that has been subject to discussion with a number of parties. As such, as a goodwill gesture the applicant agreed to undertake a second survey to validate the baseline data although this would not change the conclusion or mitigation proposed. Unfortunately, the equipment to complete the traffic survey has now

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Consultee	Summary of Response	Applicant's response
Cllr Jeremy Hurley	Concern raised in respect of any damage and disturbance that might occur as a result of the vehicle movements associated with the project. Concern about the impact and any damage that could occur to highways, culverts and drains which have existing issues. Concern raised as to the suitability or otherwise of the road network to accommodate the vehicles, noting particularly Eastlands Road and Cimla Road. Concerns in respect of how residents and businesses can access and exit the village whilst the abnormal loads are being transported to Site. Concerns raised in respect of any possible disruption to services and utilities, and whether they will have to be temporarily removed. Concern in respect of the distances between the passing vehicles and properties and associated concern about safety and any damage to property.	been vandalised twice and so the decision has been taken not to try a third time. In consultation with Neath Port Talbot Council, the applicant has agreed via condition to a series of pre and post construction surveys, so to ensure that the highway and any other assets are maintained, if not enhanced, should any degradation occur as a result of the Proposed Development. As per the above, in respect of pre- and post-construction surveys. As per the above, in respect of pre- and post-construction surveys. The applicant has prepared a Transport Management Plan that sets out how they propose to undertake the Abnormal Indivisible Load movements on the road network. Table 4 of the TMP indicates that it will take blade deliveries around two hours fourteen minutes from Swansea Docks to the Site and other abnormal loads will take around an hour and these will be undertaken outside of peak traffic hours. Services shouldn't be affected. Where cables need to be dropped this will be done in consultation with the local network operator to ensure continuity of supply As per the above, in respect of pre- and post-construction surveys. An additional topographical survey is being completed along Fforch Dwm rd.

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Consultee	Summary of Response	Applicant's response
Cllr Jeremy Hurley	Concerns raised as to the adequacy of ecological surveys, with some species and areas affected not being properly surveyed. Concerns in respect of any peat lost or disturbed as part of the construction and the discord in Welsh Government policy between supporting renewable energy and protecting peat deposits. Proximity and visibility of the turbines on Mynydd Blaenavon and their visual impact. Concerns in respect of noise, shadow flicker and telecommunications.	As per the above in respect of the legislation and guidance followed in undertaking surveys and the professional accreditation of the surveys and the third party reviews undertaken by Neath Port Talbot Council and NRW, amongst others. The applicant is liaising with Neath Port Talbot Council, the Lost Peatlands project and the Welsh Government on minimising the quantum of peat excavated and where excavation is required how that material could be reused on site to enhance existing habitats. The applicant considers that the benefits of the Proposed Development outweigh any adverse effects. It is for the Inspector and Welsh Minister to consider the weight to be applied to their respective policies when making a recommendation/decision, respectively. The Site is wholly within the pre-assessed area for wind energy within Future Wales. Notwithstanding this, the applicant is required to satisfy a number of criteria, including visual impact. The applicant has designed the Site with a number of constraints and receptors, including visual impact from residents. Alongside engagement with statutory and non-statutory consultees, this has resulted in the height of the turbines on Mynydd Blaenavon being reduced in height and moved further north away from receptors and one of the turbines being dropped. Furthermore, the change in elevation and the natural outlook of residents has been considered when assessing the visual impact. The applicant has undertaken assessments in respect of the topics noted. Noise impacts have been found to be acceptable and will be controlled by condition; and telecommunications can be mitigated and has been agreed with the provider. With regard to shadow flicker, one properties may potentially experience shadow flicker (with that

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Consultee	Summary of Response	Applicant's response
Cllr Jeremy Hurley	Concerns also in respect of water runoff and increasing levels of rainfall due to climate change exacerbating any impacts. Scope for locals to utilise the community benefit fund in a greater capacity than currently occurs with a similar fund from the Pen y Cymoedd wind farm. The need for renewables to address climate change is noted by residents but there must be a balance between that and local impact. Residents consider that the local impacts outweigh the wider benefit of the proposed development.	property being financially involved). However, the assessment does not take into consideration the screening effect of anything located between the wind turbines and the properties such as trees which will further reduce any effects. In line with legislation, the Proposed Development will not increase the rate of run-off and Sustainable Drainage Strategy will be required. The applicant has considered climate change effects in all of the assessments, where relevant. The applicant is open to discussions with anyone about the community benefit fund. Noted and agreed. Noted.
Cllr Tim Bowen	Concern as to the noise levels that the proposed development may have on residents. Concern as to how much shadow flicker the proposed development may have on residents.	The applicant has undertaken a noise assessments and noise impacts have been found to be acceptable and will be controlled by condition. With regard to shadow flicker, one property may potentially experience shadow flicker (with that property being financially involved). However, the assessment does not take into consideration the screening effect of anything located between the wind turbines and the properties such as trees which will further reduce any effects.

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Consultee	Summary of Response	Applicant's response
Cllr Tim Bowen	Concern as to what impact the proposed development might have on property prices and whether they would deter people from moving to the village. Concerns in respect of whether the proposed development will impact peat and the possible effects of any disturbance of the peat. Concerns in respect of how the proposed development might impact the water table and any flood risk (with any possible increase in house insurance premiums). Concern as to how the proposed development will be transported to site and the possible impacts it would have in respect of disruption.	As noted by the Minister on 10th February 2023 in response to a question (WQ87355 (e)) in the Senedd, "The role of the land use planning system is to regulate the development of land in the wider public interest. It is not the role of the planning system to control development on the basis of protecting individual private interests, such as property prices, or to compensate parties if their property is perceived to be less attractive as a result of a planning decision." Furthermore, it was noted during the consultation event on 18th January 2023, being the second event during the PAC period, that one of the members of the public attending had recently moved to the village, and was aware of the proposed development when purchasing and continued to purchase the property. The applicant is liaising with Neath Port Talbot Council, the Lost Peatlands project and the Welsh Government on minimising the quantum of peat excavated and where excavation is required how that material could be reused on site to enhance existing habitats. The applicant considers that the benefits of the Proposed Development outweigh any adverse effects. It is for the Inspector and Welsh Minister to consider the weight to be applied to their respective policies when making a recommendation/decision, respectively. In line with legislation, the Proposed Development will not increase the rate of run-off and Sustainable Drainage Strategy will be required. The applicant has considered climate change effects in all of the assessments, where relevant. The applicant has set out in the Transport Management Plan how they propose to coordinate vehicle movements to ensure the least possible impact to the road network i.e. by avoiding peak traffic hours.

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Consultee	Summary of Response	Applicant's response
Cllr Tim Bowen	Concern about the quality of the road network that we are proposing to use and current restrictions in place on these roads. Concern as to how emergency vehicles could access the village in case of an emergency when the abnormal indivisible loads are being transported. The impact arising from the increase in frequency of HGVs on the roads in Tonmawr. Concerns regarding any impacts that may arise from widening Fforch Dwm Road. Concerns raised in respect of the grid connection from the Site to Briton Ferry and the impact this might have on the environment.	In consultation with Neath Port Talbot Council, the applicant has agreed via condition to a series of pre and post construction surveys, so to ensure that the highway and any other assets are maintained, if not enhanced, should any degradation occur as a result of the Proposed Development. The Transport Management Plan includes a specific section on such a scenario. The Abnormal Indivisible Load will be accompanied by a police escort that will be in constant contact with the emergency service contact centre so to understand if any blue light services are required to travel along the same route, at which point the police escort will remove the vehicles from the road to allow safe and quick passage for the blue light service. The application identifies the impact as temporary and will reduce and manage the impact through a Traffic Management Plan (a copy of which is submitted as part of the application). In consultation with Neath Port Talbot Council, the applicant has agreed to an Ecological Clerk of Works being present when any works are undertaken so to ensure that ecological interests are protected, should they be discovered during the course of work being undertaken. The applicant can share details of this Clerk, once appointed (which will only occur if the application is approved). The application has undertaken a high level assessment of the grid connection corridor, in line with the relevant guidance and legislation. The grid connection will be subject to a separate application in due course.

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Consultee	Summary of Response	Applicant's response
Cllr Tim Bowen	Comment raised as to the capacity of National Grid and the wider electricity network and that turbines in the local area are switched off because of this. Impact to air quality that could arise due to increase quantum of vehicles on the local road network.	The applicant already has a grid connection agreement with the National Grid. The applicant is currently considering what additions could be made to the Construction Environment Management Plan in respect of air quality.
Dr Altaf Hussain MS	Concern raised in respect of noise levels from the proposed development. Concern in respect of shadow flicker arising from the proposed development. Concern in respect of the possible devaluation in property prices.	Noise impacts have been found to be acceptable and will be controlled by condition. With regard to shadow flicker, one property may potentially experience shadow flicker (with that property being financially involved). However, the assessment does not take into consideration the screening effect of anything located between the wind turbines and the properties such as trees which will further reduce any effects. The role of the land use planning system is to regulate the development of land in the wider public interest. It is not the role of the planning system to control development on the basis of protecting individual private interests, such as property prices, or to compensate parties if their property is perceived to be less attractive as a result of a planning decision. As noted previously, it was noted during the consultation event on 18th January 2023, being the second event during the PAC period, that one of the members of the public attending had recently moved to the village, and was aware of the proposed development when purchasing and continued to purchase the property.

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Consultee	Summary of Response	Applicant's response
Dr Altaf Hussain MS	Concern in respect of impact upon the landscape.	The Site is wholly within the pre-assessed area for wind energy within Future Wales, which considered turbines of up to 250m to be appropriate, subject to other criteria. Alongside engagement with statutory and non-statutory consultees, this has resulted in the height of the turbines on Mynydd Blaenavon being reduced in height and moved further north away from receptors. Furthermore, the change in elevation and the natural outlook of residents has been considered when assessing the visual impact.
	Concern in respect of the possible reduction of visitors to the area and associated impact to jobs and tourism.	The modelling within the ES indicates that the wider UK will see 14 direct and 7 indirect full time employment job years over the three year construction period. Of these, Wales will see 7 direct and 3 indirect full time employment created or safeguarded and the local area will benefit from 1 job and 0.3 jobs direct over the three year construction period. This creates 21 full time employment jobs in the wider UK, 9 full time employment jobs in Wales and 1.6 full time employment job years for the local area, as per table 14.3 of the ES, with a medium positive effect.
	Concern in respect of the safety of the turbines.	The turbines are continuously monitored 24x7 both by an onboard controller and remotely by engineers. If any of the safety critical elements are not responding or behaving correctly the turbine will stop automatically and an engineer team will be sent to visit the turbine. The turbines will receive a comprehensive service at regular intervals during the year, when all the safety critical features are tested and recertified. The equipment in the turbine associated with lifting and fire protection are inspected at least once per year according to UK legislation.

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Consultee	Summary of Response	Applicant's response
Dr Altaf Hussain MS	Concern in respect of any impact on peat present on the Site and the possible release of carbon from any disturbance.	In discussion with Neath Port Talbot Council, the Lost Peatlands project and the Welsh Government's Land Quality Advisory Service, the applicant is revising their approach to peat to include for more restoration and integration with the Outline Habitat Management Plan. The applicant has prepared a carbon calculator for the project, which indicates that the project will be carbon neutral within 1.6 years after which it will be removing carbon from the environment.
	Concern in respect of damage to the water table and any increase in flood risk.	In line with legislation, the Proposed Development will not increase the rate of run-off and Sustainable Drainage Strategy will be required. The applicant has considered climate change effects in all of the assessments, where relevant.
	Concern in respect of the impacts to the local road network, particularly during the transit of the Abnormal Indivisible Loads and the possible need for a blue light service to access residents.	Within the Transport Management Plan, the applicant has set out how it intends to transport the Abnormal Indivisible Loads to site. The applicant is working with both the Welsh Government's and Neath Port Talbot Council's highway departments to agree these proposals. The applicant will ensure that the community council and local residents are kept updated on this matter as the project progresses. The Transport Management Plan includes a specific section on such a scenario. The Abnormal Indivisible Load will be accompanied by a police escort that will be in constant contact with the emergency service contact centre so to understand if any blue light services are required to travel along the same route, at which point the police escort will remove the vehicles from the road to allow safe and quick passage for the blue light service.
	Concerns in respect of the access to the Site and the management of traffic movements.	In consultation with Neath Port Talbot Council, the applicant has agreed via condition to a series of pre and post construction surveys, so to ensure that the highway and any other assets are maintained, if

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Consultee	Summary of Response	Applicant's response
Dr Altaf Hussain MS	Concerns in respect of any impacts to trees, habitats and species arising from the proposed development.	not enhanced, should any degradation occur as a result of the Proposed Development. No mature trees will be cleared and all works carried out under a RAMS and Ecological Clerk of Works. Impacts to habitats and species have been assessed in line with the relevant legislations and guidance, with third parties, including NRW and Neath Port Talbot Council, reviewing the data prepared. Furthermore, an ecological clerk of works would be present during construction to ensure works are undertaken in line with the relevant legislation and guidance.
	Concern in respect of cumulative schemes e.g. other wind farms and the appropriateness of wind farms in this location.	The Site is wholly within the pre-assessed area for wind energy within Future Wales. Notwithstanding this, the applicant is required to satisfy a number of criteria, including visual impact. The applicant has designed the Site with a number of constraints and receptors, including visual impact from residents.
	Concern in respect of the environmental harm that the grid connection may have.	The application has undertaken a high level assessment of the grid connection corridor, in line with the relevant guidance and legislation. The grid connection will be subject to a separate application in due course.
	Concern in respect of capacity issues of the National Grid and the utility of existing turbines.	The applicant already has a grid connection agreement with the National Grid. The applicant is unable to comment on the utility of other wind farms in the local area. The applicant would welcome a discussion on this point, not least if Dr Altaf Hussain MS has had the meeting with National Grid that he mentions.
	Concern that the proposed development doesn't not provide economic benefit and/or jobs to local people.	The applicant is open to discussions with anyone about the community benefit fund, the economic benefit of low carbon energy

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Consultee	Summary of Response	Applicant's response
	Concern in respect of decommissioning and how this is secured.	and opportunities for local contractors in the construction of the wind farm A decommissioning plan is typically secured via condition to any decision notice. As noted, the decommissioning is secured in a manner similar to an escrow account.
Cllr Carl Jordan (Neath South)	Concerns in respect of the impact arising from the construction of the proposed development, including any disturbance arising from the transit of Abnormal Indivisible Loads. The possible impact to the highways from the construction traffic and any issues / faults arising associated with the added traffic. Visual impact on Neath and the surrounding area, notably around Cefn Saeson area. Visual impact on residents and users of the Site and its PRowS.	Within the Transport Management Plan, the applicant has set out how it intends to transport the Abnormal Indivisible Loads to site. The applicant is working with both the Welsh Government's and Neath Port Talbot Council's highway departments to agree these proposals. The applicant will ensure that the community council and local residents are kept updated on this matter as the project progresses. In consultation with Neath Port Talbot Council, the applicant has agreed via condition to a series of pre and post construction surveys, so to ensure that the highway and any other assets are maintained, if not enhanced, should any degradation occur as a result of the Proposed Development. The Proposed Development will have visual impacts, specifically onto: users of PRowS; within Tonmawr; and on local roads to in the Cimla area, as noted. The applicant has discussed the Proposed Development with a number of consultees, including Neath Port Talbot Council's Public Rights of Way officer, who raised no objection. The Proposed Development will not stop up or divert any Public Rights of Way.
Cllr D Lewis (Resolven & Tonna)	Noting the visibility of the turbines within the Resolven & Tonna areas, will these areas also benefit from a Community Benefit Fund.	The applicant is open to discussions with anyone about the community benefit fund.

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Consultee	Summary of Response	Applicant's response
	The traffic movements arising have potential to impact traffic on the Neath end of the Resolven & Tonna wards that could impact residents and users.	Within the Transport Management Plan, the applicant has set out how it intends to transport the Abnormal Indivisible Loads to site. The applicant is working with both the Welsh Government's and Neath Port Talbot Council's highway departments to agree these proposals. The applicant will ensure that the community council and local residents are kept updated on this matter as the project progresses.
Resolven Community Council	No comment to make.	Noted.
Tonna Community Council	No response.	Noted.
Non-Specialist Consultees		
Glamorgan Gwent Archaeological Trust	Recommend that Cadw should be consulted about the use of a floating road to mitigation any potential impact on the Scheduled Monument, and that Scheduled Monument consent is required. The access track should be re-routed to avoid a non-designated medieval platform.	The applicant has engaged with Cadw as part of this process – see above – and is considering the timing of any such application. The proposed development proposes to mitigate impacts to the medieval platform (non-designated) and the ES reflects this.
Glamorgan Gwent Archaeological Trust	The suggested initial geophysical survey is appropriate and should be carried out in accordance with an agreed Written Scheme of Investigation.	Noted and agreed.

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Consultee	Summary of Response	Applicant's response
Ministry of Defence	Subject to conditions, the Ministry of Defence has no objection to the proposed development (the conditions relate to aviation lighting; and aviation charting and safety management).	Noted.
Dwr Cymru Welsh Water	The application does not propose to connect to the public sewer and therefore no further comments on this point are required. Additionally, a water supply is not required so no further comments on this point are required.	Noted and agreed. Noted and agreed.
Neath Port Talbot Ecology department	None of the following concerns are considered to be major and can be addressed through alterations to the scheme. Peat management plan: Some areas required additional ground investigation to fully characterise the peat; Use of floating tracks, as discussed with the Lost Peatlands project. Peat should not be used to reinstate verges but instead used for restoration. Query in respect of the excavated materials calculator in that more is being used than will be excavated.	Noted and agreed. Following receipt of their comments, the applicant has engaged with Neath Port Talbot ecology department and the Lost Peatlands project and has revised their approach to the management of peat, so to align with NPT's and the Lost Peatlands Projects existing approach. The applicant will alter wording to ensure it is clear that no floating tracks are planned. However, we propose to keep the method in there for the unlikely scenario of coming across deeper peat during construction activity. Following our discussions with the Lost Peatlands project we will rework the PMP to show a slight surplus for use in habitat restoration (with Lost Peatland on the MFD area of site and potentially in banded peat stores on Blaenafon area - although will look to minimise this) As above, the applicant will rework the PMP to show a slight excess for use in HMP.

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Consultee	Summary of Response	Applicant's response
Neath Port Talbot Ecology department	Outline Habitat Management Plan Habitat restoration to be amended following consultation with the Lost Peatlands project. Frequency of monitoring of restoration to be amended to align with other schemes. Water vole surveys required prior to any works on the SINCS. Potential to increase the management beyond the identified SINCS and increase the area enhanced as a result of the proposed development. Concern raised in respect of tree planting on the Mynydd Blaenavon site. All proposed monitoring years to align with other wind farms. With regard to bats, the feathering/curtailment noted is considered appropriate and aligns with other wind farms. Robust monitoring will be required. With regard to birds the future baseline (noting the trees being planted as part of a separate project on the Mynydd Blaenavon site) will change the habitat, so need to ensure that buffers are in place.	The applicant will continue to liaise with the Lost Peatlands project about habitat restoration measures most appropriate to the locality. Noted and there will be a commitment to monitor the success of restoration measures in those noted years. Noted – pre-construction surveys will be undertaken and this is a commitment. Opportunities to undertake further enhancement on the Site will be considered and, if possible, included within the Outline Habitat Management Plan. This is separate to the application in hand but the concern raised is noted. Noted and monitoring will be undertaken on the years noted. Noted and there will be a commitment to undertake robust monitoring for bats and birds. The assessment within the ES considers potential changes to the bird assemblage within the Mynydd Blaenavon site as a result of the forestation (the future baseline). Bird monitoring will be extended to include an appraisal of the bird assemblage and identify notable changes using the habitats as the forestry habitats mature.

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Consultee	Summary of Response	Applicant's response
Neath Port Talbot Ecology department	With regard to reptiles, the low amount of reptiles spotted (and no adders) was surprising but recognises that the surveys records what was found. However, a method statement should be prepared in case unexpected reptiles are encountered during works, including how they would be dealt with.	There is a commitment to put in place a RAMS to protect reptiles during the construction phase. The RAMS will be subject to approval by Neath Port Talbot Council and NRW.
SWTRA	Following a request and receipt of information relating to: the trunk road to Site; and anticipated travelling vehicle dimensions; SWTRA have indicated that the trunk road section of the route should be suitable – albeit they requested further details on the vehicles.	Noted.
Welsh Government's Land Quality Advisory Service	In terms of identifying peat we employ the Soil Survey of England and Wales definition which is confirmed in the National Peatland Action Programme document: This includes any transitioning shallow peaty soils integral to the hydrological functioning of peat bodies: - Peat soils are defined by the Soil Survey of England & Wales as: ▪ more than 40 cm of organic (O horizon) material within the upper 80cm, excluding fresh litter (L) and living moss; or ▪ more than 30 cm of organic (O horizon) material resting directly on the bedrock (R or Cr) or extremely stony material; and, ▪ no overlying non-humose material mineral horizon that has a colour value of 4 or more and extends below 30cm depth. There is inconsistency over the use of this definition and the arbitrary 50cm threshold.	This approach was largely driven by council's request to see development moved away from any areas with 50cm depth of peat/soils or greater.

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Consultee	Summary of Response	Applicant's response
Welsh Government's Land Quality Advisory Service	This makes it difficult to assess the volumes, risks, and impacts through Peat Management Plan. In addition, Section 1.1 of the PMP states, Areas of the site where soils are less than 0.5m thick are considered to be too thin to be classified as peat and are therefore classified as soils. There is concern over the calculation of peat volumes, micro siting allowance (50m and 100m depending on the infrastructure), the use of 50cm as an assessment threshold, application of aspects of the SEPA Guidance note, the storage and re-use of peat and potential impacts on mineral, organo-mineral and shallow peat soils. In addition the PMP does not appear to have been updated since our recent discussion and does not appear consistent with ES chapter 4 – Scheme description and alternatives. To assess potential impacts and inform decisions on infrastructure siting, location and extent of mineral, organo-mineral and shallow peat (where not integral to the functioning of a peat body) soils on site and their physical characteristics would be beneficial for areas of any proposed infrastructure siting. This would provide information to inform a Soil Management Plan (SMP) and inform the decommissioning plan, restoration, and aftercare of the site. The proposals for the re-use of peat on site to reinstate track shoulders, crane hardstanding and turbine bases (Section 3.1 of PMP) also raises concerns. Peat is extremely fragile and excavated peat appears to be at high risk of degradation and would therefore be considered a loss. In addition, the principles in the Peat Management Plan under section 4.5 appear to be generic and do not reflect the specifics of the proposal. The restoration proposals under section 4.6 are also	This can be reworded to reflect the WG policy of 30cm. PMP will be updated to reflect final design freeze. More detail on the calculation of peat volumes and a realignment to the 30cm depth threshold will be included in calcs. Wording around the use of SEPA guidance will be reviewed for relevance. Need to consider whether we include a separate soil management plan. I believe that this can be covered off in the current PMP if we approach it the right way. We should look to minimise use in reinstatement on these areas if this is raising concern. This will assist in freeing up peat for use in HMP. These sections will be reviewed.

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Consultee	Summary of Response	Applicant's response
Welsh Government's Land Quality Advisory Service	generic do not consider good soil handling principles or appear to relate to Table 5-1 "re use requirements". There is also concern over the treatment of peat as a waste in Table 6-1 of the PMP and how this risk also relates to the micro siting allowance. I'm not clear how the hydrological function of the peat is maintained, the relationship between hydrology and the PMP, and overall drainage scheme. I'm concerned the Peat Management Plan often references SEPA – it raises a question over how much of the plan is bespoke to the development or taken from another project. See Table 6-1 as an example, reuse bottom right, "If peat does not require treatment prior to re-use it could be used on-site providing adequate justification and method statements are provided and approved by SEPA". At the heart of our concern is meeting Policy 18(10) of NDF Future Wales. The proposals at present would not give us confidence effective restoration would be achieved and therefore the peat resource underpinning national natural resources in Policy 9 of FW would be compromised.	I don't believe that we have peat as a waste for our site – will check the wording here. Will be reviewed when we revise the PMP. It is correct that we cross reference and work to SEPA guidance however the yellow highlighted text is clearly an error. Revised PMP will be checked. Our discussions with Lost Peatland need to feed into the narrative here and the work on restoring peatland within the HMP should help give confidence in our approach.
Wales & West Utilities	Wales & West have no apparatus in the area and, as such, no further comments to make.	Noted.

4.1.2. Eleven emails and 10 letters were received from local residents during the PAC period. These comments raised a number of common themes and have therefore been addressed in the FAQ document prepared as part of the consultation process, which can be found in Appendix C. The FAQ summarise all of the questions (and their themes) and the applicant's response. The applicant also received a response from a Community Action Group, with responses to their questions largely addressed in Table 7 & 8 and in completeness in Appendix C.

4.1.3. Table 8, below, highlights some of the common and key questions raised during consultation and the applicants response.

Table 8: questions from local residents

Question	Applicant's response
Ecology & Ornithology	
What standards have the surveys been done to?	The ecological and ornithological assessment has been undertaken with regard to CIEEM guidelines (2018) and informed by consultation with PEDW, NRW, Neath Port Talbot Council and others.
Energy	
How much energy will the project generate?	Based upon the project we are consulting on, we expect to generate around 100,000MWh per annum.
General	
What are the benefits of the project?	As noted within the Collaborative Benefits Report, the project has several benefits, including reduction in carbon (with a payback period of 16 months - which considers carbon within peat); significant quantum of renewable energy generated; a community benefit fund; local/shared ownership of the project; economic benefits from jobs and training; and biodiversity net benefit.
How is the project assessed by the Welsh Government?	In Wales at present projects that generate over 10MW of electricity are classified as Developments of National Significance and are determined by the Welsh Ministers and processed by Planning and Environment Decision Wales. The application is assessed on its merits and a recommendation made to the Minister for their determination.

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Question	Applicant's response
Has the project considered impacts on well-being and the Well-being of Future Generations Act?	Yes. The project has seven well-being goals and the five ways of working in developing the project. The project will improve the economic, social, environmental and cultural well-being of Wales, as well as being in line with the sustainable development principle. Furthermore, the Minister will have regard to the Well-being of Future Generations Act when making any decision. This is set out in the Planning, Design and Access Statement.
What role does Neath Port Talbot Council have in the application?	Neath Port Talbot are a specialist consultee on the DNS application and provide an important local perspective, including the preparation of a Local Impacts Report for submission to PEDW. Neath Port Talbot do not determine the DNS application
Has shadow flicker been assessed?	Yes, shadow flicker from the turbines has been assessed as part of the application and can be found within the Environmental Statement chapter 6 and in ES figure 4.02.6.2., which concludes that there will be no significant effects in relation to shadow flicker following mitigation.
Has glint and glare been assessed?	Yes, glint and glare has been assessed as part of the application and can be found within the Environmental Assessment chapter 6 and in the Solar Photovoltaic Glint and Glare Study in appendix 6.4 of the ES. The ES and appendix concludes that no impact is predicted on roads or dwellings.
What consideration has been given to other nearby projects?	The Environmental Statement has assessed other developments (not limited to wind farms) - see appendix 3.4 of the ES that may interact with the project. The cumulative effects of the project and other developments is assessed within each chapter.
Who are the specialist consultees and can we see their responses?	"The specialist consultees include: Welsh Government highways department; Natural Resources Wales (NRW); Welsh Water Dwr Cymru; Neath Port Talbot highways department; Mid and West Wales Fire and Rescue Service; Cadw; Pelenna community council; the Health and Safety Executive; The Coal Authority; Resolven community council; and Tonna community council.

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Question	Applicant's response
	As part of the PAC process, all of their responses will be appended to the PAC report, which will be publicly available once the application has been submitted to PEDW."
Grid connection	
Can the project use another wind farm's grid connection?	For security of future supply, assuming that the project is approved, the applicant has secured their own grid connection at Briton Ferry. This is the grid connection offered by the local network operator. Generally speaking the grid connection for a wind farm will be limited to the size required for the wind farm.
Why doesn't the application include the connection to the grid at Briton Ferry?	The applicant's priority is on securing consent for the generation of electricity first and then seeking a connection to the grid if the project is approved.
Ground conditions	
Has a coal mining risk assessment been undertaken?	Appendix 11.3 of the ES includes a Coal Mining Risk Assessment. Furthermore, we've had a response from the Coal Authority on 16th December advising that they have no objection to the project.
Will the project affect drainage and flood risk on and around the Site	As noted in chapter 11 of the Environmental Statement, possible changes to existing runoff patterns due to the project have been considered and the possible impact considered to be negligible and that this could be further mitigated through the maintenance of vegetation and the implementation of a water drainage strategy. It is noted that there could be interruption to shallow groundwater flow regimes due to the construction and presence of foundations. However, the site design has ensured that turbines are located on shallower peat and on flat ground and with appropriate site drainage, existing hydrogeological regimes will be maintained.
Peat	
Has the project considered the carbon effects of the project, noting the presence of peat on site?	The possible carbon losses from affecting areas of peat and construction have been factored into the carbon calculator (ES Appendix 11.4) for the projects - which indicates a carbon payback time of 16 months.

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Question	Applicant's response
How has the project considered impacts upon peat?	ES Chapter includes an assessment of peat, that also draws upon ES Appendix 11.2 (Peat Management Plan). The ES chapter concludes that without mitigation, impacts upon peat are considered to be a minor effect. This effect is reached due to the approach taken, as noted in the Peat Management Plan, that seeks to use cross track drains, permeable surfaces and other measures to reduce impacts to surface water flows and reproduce a runoff pattern that mimics the existing regime. Most of the project is located on areas of areas of no or shallow peat (<0.5m) - with small areas located on areas of peat of depths 0.5-1.0m.
Transport	
Are the access roads wide enough?	Based upon the work we've undertaken to date, the roads are wide enough for us to transport the turbines onto Blaenavon and Fforch Dwm. Further details on this matter are available in ES Appendix 13.1 Transport Assessment and the Transport Management Plan (Appendix B of the Transport Assessment).
How will emergencies be handled when the abnormal loads are moving to Site?	In the case of an emergency, the escorting police would be informed and would take steps to ensure that the blue-light vehicle attending to the emergency could pass unhindered. The entire process is controlled by the escorting police officers in contact with the emergency services control centre. Further details are noted on page 14 of the Transport Management Plan, which is Appendix B to the Transport Assessment which is ES Appendix 13.1.

5. Main issues & the Applicant's response

5.1.1. This chapter provides a summary of the issues raised in response to statutory publicity, the applicants response and any changes made to the proposed development in light of the comments.

Table 8: Main issues and applicant's response

Main issue	Applicant's response and changes to the Proposed Development
Landscape and visual	
Clarification in respect of viewpoint 13.	The applicant has clarified the content of night time viewpoint 13, which, in summary, includes campers whereas the day time viewpoint does not.
Perceived impact of the Proposed Development on the surrounding landscape	The Proposed Development is wholly located within a Pre-Assessed Area for wind energy within Future Wales, the impact upon the landscape of which has been assessed and considered to be acceptable for turbines of up to 250m.
Noise and vibration	
Concerns raised in respect of noise.	The applicant has undertaken a noise assessment. Noise impacts have been found to be acceptable and will be controlled by condition – with the removal of turbine 2 reducing any impacts.
Ecology	
Replacement of the bridge structure should be free span so to protect the fishway which is in-situ.	The applicant has liaised with NRW on this matter and, subject to detailed design, will revise the design to align with the proposed free span nature.
Ornithology	
Clarification in respect of winter walkover surveys on Mynydd Blaenavon	The Site does not satisfy the criteria within the NatureScot guidance, which is best practice, which has been used in absence of any Welsh guidance.
Clarification in respect of moorland breeding bird surveys.	The applicant utilised best practice guidance as prepared by NatureScot, which was used in the absence of any Welsh guidance.
Clarification in respect of the values indicated in table 3.3 of the ES.	The 'x' indicated signifies that the species was present/breeding and that '0' meant that the species was not recorded as breeding.
Geology, hydrology, hydrogeology and peat	

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Concern raised in respect of any adverse impact arising from any peat excavated.	The applicant has engaged with Neath Port Talbot Council, the Lost Peatlands project, and the Welsh Government on the proposed approach.
Concern in respect of changes to water run off arising from the Proposed Development.	In line with legislation, the Proposed Development will not increase the rate of run-off and Sustainable Drainage Strategy will be required. The applicant has considered climate change effects in all of the assessments, where relevant.
Archaeology and cultural heritage	
Additional details in respect of mitigation for any impacts to the scheduled monument.	The applicant is proposing a floating road to provide protection to the asset.
Scheduled monument consent required, in addition to DNS application.	Noted and agreed.
Transport and access	
Neath Port Talbot highways department requested that an abnormal trial run is undertaken prior to construction starting on site.	The applicant will undertake a trial run, to ensure that the abnormal loads can safely traverse the access route.
Perceived impact of construction traffic, including abnormal loads, on residents.	The removal of turbine 2 and reduction in height of turbines 4 & 5 leads to a reduction in associated vehicle movements. Furthermore, in conjunction with the Council, the applicant has agreed to a suite of pre- and post- construction surveys to ensure the quality of the street scene is retained.
Concern in respect of traffic count data used and topographical surveys.	In response to the queries raised, the applicant has undertaken a second topographical survey and a second round of traffic counts. Unfortunately, the traffic count equipment was vandalised so the original data has been used in the ES.
Socio-economic effects	
Concern in respect of how the community benefit fund can be accessed and used.	The applicant is open to discussions with anyone about the community benefit fund.
Other	
Decommissioning	
Concerns were raised in respect of shadow flicker and telecommunications.	The applicant has undertaken assessments in respect of the topics noted. Telecommunications can be mitigated and has been agreed with the provider.

	With regard to shadow flicker, two properties may have potentially experience shadow flicker (with one being financially involved) for the scheme consulted on. However, the changes made to the scheme by the applicant now means that one property (which is financially involved) would now may experience shadow flicker. Furthermore, the assessment does not take into consideration the screening effect of anything located between the wind turbines and the properties, such as trees, which will further reduce any effects.
Concern in respect of the possible impact of the Proposed Development on property prices.	As noted by the Minister for Climate Change on 10th February 2023, <i>“The role of the land use planning system is to regulate the development of land in the wider public interest. It is not the role of the planning system to control development on the basis of protecting individual private interests, such as property prices, or to compensate parties if their property is perceived to be less attractive as a result of a planning decision.”</i> Furthermore, it was noted during the consultation event on 18th January 2023, being the second event during the PAC period, that one of the members of the public attending had recently moved to the village, and was aware of the proposed development when purchasing and continued to purchase the property.

6. Conclusion

- 6.1.1. The purpose of this pre-application consultation was to communicate and consult with local residents, community representatives, statutory consultees and interested parties through the evolution of the proposals. Activity undertaken has sought to go beyond the legislative requirements and add value to both the applicant and consultees through meaningful engagement.
- 6.1.2. This document meets the requirements set out under sections 8, 9, 10 and 11 of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) and provides an account of the statutory consultation, publicity, deadlines set, and activities required under section 61Z of the Town & Country Planning Act 1990. The document includes copies of all relevant notices, declarations of compliance and relevant details of required consultees (Appendix A).
- 6.1.3. Extensive informal consultation following EIA scoping was undertaken and useful in informing the statutory consultation process, which occurred between 5th December 2022 and 23rd January 2023 (49 days, rather than the required 42 days).
- 6.1.4. In line with section 11(a) of the DNSPWO, this report sets out how the applicant complied with section 61Z of the 1990 Act and how the response to the consultation received from persons consulted under section 61Z(3) or (4) of the 1990 act was accounted for by the applicant.
- 6.1.5. All relevant information was made available on the project website, with additional printed material available at public consultation events. The consultation had a good response rate, with responses received from all statutory consultees within agreed timeframes and a good presence from non-specialist consultees and members of the public.
- 6.1.6. As noted in section 1, following consultation the application has been amended to reflect the comments received, principally relating to the omission of turbine 2, the reduction in tip height of turbines 4 and 5 and the reconfiguration of the solar array.
- 6.1.7. Addressing these changes in turn, the removal of turbine 2 from the proposed layout reflects the comments received from community consultees in respect of the proximity of turbine 2 to Tonmawr and the perceived impacts this would have on residents and users. The removal of turbine 2 also reduces the number of abnormal vehicle movements (both abnormal loads) travelling to and from the Site.
- 6.1.8. The reduction in height of turbines 4 and 5 from 220m to 200m further reduces the number of vehicle movements to and from the Site, as one less tower section is required for both towers. The reduction in height also reduces the visual impact of these turbines.
- 6.1.9. It is considered that the consultation was useful in refining the scheme prior to submission and that the consultation process will have addressed issues raised by those parties consulted ahead of consideration by PEDW, the appointed Inspector and, in time, the Minister. The proposal represents a high-quality scheme in a pre-assessed area for wind energy that can provide significant contributions to Wales' carbon reduction and renewable energy generation targets, with minimal detriment to the Site and local area.



Appendix A - Statutory notices, letters and declarations

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Appendix A.1 – Schedule 1 Site Notice

The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 8 AND 9(2)

(to be served on owners and / or occupiers of adjoining land, community consultees and relevant persons; displayed by site notice on or near the location of the proposed development and published in a newspaper in the locality.)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at :	Address or location of the proposed development Mynydd Fforch Dwm Wind Farm, 1km north-east of Tonmawr, 4km south of Resolven and 6km east of Neath. The Site consists of Mynydd Fforch Dwm and Mynydd Blaenavon.
I give notice that:	Applicant's Name Mynydd Fforch Dwm Wind Energy 2021 Limited
is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is:	Description of the proposed development Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.
And considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:	Details of secondary consents in respect of which the applicant considers a decision should be made by the Welsh Ministers (Section 62H of the Town and Country Planning Act 1990, as prescribed by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016) N/A
You may inspect copies of: - the proposed application; - the plans; and - other supporting documents online at:	Address of website https://mfdwindfarm.co.uk/consultation-library/
Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:	Email address of the applicant/agent hello@mfdwindfarm.co.uk
	Address of the applicant C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
By:	Date giving a period of 42 days, beginning with the date of service and publication 23/01/2023 (which is 49 days from 5/12/22)
Signed:	Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)
Date:	05/12/2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
CYHOEDDUSRWYDD AC YMGYNGHORIAD CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGLAU 8 A 9(2)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar Ddatblygiad o Arwyddocâd Cenedlaethol (DNS) arfaethedig cyn cyflwyno cais cynllunio i Weinidogion Cymru. Bydd ceisiadau cynllunio ar gyfer DNS yn cael eu cyhoeddi gan Weinidogion Cymru a'r awdurdod cynllunio lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i Weinidogion Cymru ar unrhyw gais cynllunio DNS cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu rhoi ar y ffeil gyhoeddus.

	Cyfeiriad neu leoliad y datblygiad arfaethedig
Datblygiad Arfaethedig yn:	Fferm Wynt Mynydd Fforch Dwm, 1 cilomedr i'r gogledd-ddwyrain o Donmawr, 4 cilomedr i'r de o Resolfen a 6 cilomedr i'r dwyrain o Gastell-nedd. Mae'r safle yn cynnwys Mynydd Fforch Dwm a Mynydd Blaenafon.
Rhoddaf hysbysiad fod:	Enw'r ceisydd: Mynydd Fforch Dwm Wind Energy 2021 Limited
yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sydd ar gyfer:	Disgrifiad o'r datblygiad arfaethedig: Fferm wynt ac arae solar, ynghyd a chyfarpar, seilwaith a Gwaith ategol cysylltiedig.
ac yn ystyried bod y cydsyniadau eilaidd a ganlyn yn gysylltiedig â'r cais arfaethedig a bod penderfyniad mewn cysylltiad â'r cydsyniadau hynny i'w wneud gan Weinidogion Cymru, neu gan berson a benodir gan Weinidogion Cymru at y diben hwnnw, neu y dylai gael ei wneud ganddynt:	Manylion o'r cydsyniadau eilaidd y tybia'r ceisydd y dylai Gweinidogion Cymru wneud penderfyniad arnynt (Adran 62H o Ddeddf Cynllunio Gwlad a Thref 1990; rhagnodir cydsyniadau eilaidd at ddibenion adran 62H gan Reoliadau Datblygiadau o Arwyddocâd Cenedlaethol (Meini Prawf Penodedig a Chydsyniadau Eilaidd Rhagnodedig) (Cymru) 2016) N/A
Gallwch archwilio copïau o: - y cais arfaethedig - y cynlluniau; a - dogfennau ategol eraill	Cyfeiriad y wefan https://mfdwindfarm.co.uk/consultation-library/
Ar- lein yn:	
Dylai unrhyw un sy' dymuno gwneud sylwadau ynglyn a'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/ yr asiant yn:	Cyfeiriad e-bost y ceisydd/ asiant hello@mfdwindfarm.co.uk Cyfeiriad y ceisydd: C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
Erbyn:	Dyddiad sy'n darparu cyfnod o 42 diwrnod, sy'n dechrau gyda'r dyddiad cyflwyno a chyhoeddi 23/01/2023 (49 diwrnod o 5/12/22)
Llofnod:	Savills (ar ran Mynydd Fforch Dwm Wind Energy 2021 Limited)
Dyddiad:	05/12/2022

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.2 – List of address notified in accordance with article 8(1)(a)(ii)

List of surrounding land owners to which owner/occupier letters were sent.

ADDRESS 1	ADDRESS 2	ADDRESS 3	ADDRESS 4	ADDRESS 5
Tynycoed	Fforchdwm Farm	Tonmawr	Port Talbot	SA12 9SS
Pitt Farm	Dry Lane	Christow	Devon	EX6 7PH
Tonmawr Farm	Tonmawr	Port Talbot		SA12 9ST
4 Railway Terrace	Tonmawr	Port Talbot		SA12 9SU

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.3 – Copy of letter and notice given to persons notified in accordance with article 8(1)(a)(ii)

05 December 2022

The Savills logo consists of the word "savills" in a lowercase, red, sans-serif font, positioned within a solid yellow rectangular background.

To the Owner / Occupier

2 Kingsway
Cardiff CF10 3FD
T: +44 (0) 29 20 368900
savills.com

Dear Sir / Madam,

On behalf of our client, Mynydd Fforch Dwm Wind Energy 2021 Limited, Savills is instructed to undertake pre-application consultation in relation to land at Mynydd Fforch Dwm. Full planning permission will be sought for a:

"Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works."

We are required to undertake Pre-Application Consultation ("PAC") for a period of 42 days in advance of the planning application being submitted to Planning and Environment Decisions Wales (PEDW). In this regard, we are writing to confirm that the PAC process will run from 05 December 2022 until 23 January 2023 (which is 49 days from 05/12/2022).

The attached notice provides instructions on how the draft application can be viewed and how comments on the proposals can be submitted. You are able to view the application online at <https://mfdwindfarm.co.uk/consultation-library/>. Computer facilities are available to view this information by visiting Cwmafan Library, Depot Road, Port Talbot, SA12 9DF or Neath Library, 35 Victoria Gardens, Neath, SA11 3BA.

Please note, this PAC provides the opportunity to comment directly to Mynydd Fforch Dwm Wind Energy 2021 Limited, as the applicant, on the proposed development prior to the formal submission of the planning application to PEDW. Any subsequent planning application will be subject to statutory consultation by PEDW and any comments provided in response to this notice will not prejudice your ability to make further representations to PEDW on any related planning application. You should note that any comments submitted may be placed on the public file.

Yours faithfully,

A stylized, handwritten signature of the word "Savills" in dark ink.

Savills

Enclosed: Notice 1

The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 8 AND 9(2)

(to be served on owners and / or occupiers of adjoining land, community consultees and relevant persons; displayed by site notice on or near the location of the proposed development and published in a newspaper in the locality.)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at :	Address or location of the proposed development Mynydd Fforch Dwm Wind Farm, 1km north-east of Tonmawr, 4km south of Resolven and 6km east of Neath. The Site consists of Mynydd Fforch Dwm and Mynydd Blaenavon.
I give notice that:	Applicant's Name Mynydd Fforch Dwm Wind Energy 2021 Limited
is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is:	Description of the proposed development Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.
And considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:	Details of secondary consents in respect of which the applicant considers a decision should be made by the Welsh Ministers (Section 62H of the Town and Country Planning Act 1990, as prescribed by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016) N/A
You may inspect copies of: - the proposed application; - the plans; and - other supporting documents online at:	Address of website https://mfdwindfarm.co.uk/consultation-library/
Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:	Email address of the applicant/agent hello@mfdwindfarm.co.uk
	Address of the applicant C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
By:	Date giving a period of 42 days, beginning with the date of service and publication 23/01/2023 (which is 49 days from 5/12/22)
Signed:	Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)
Date:	05/12/2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
CYHOEDDUSRWYDD AC YMGYNGHORIAD CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGLAU 8 A 9(2)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar Ddatblygiad o Arwyddocâd Cenedlaethol (DNS) arfaethedig cyn cyflwyno cais cynllunio i Weinidogion Cymru. Bydd ceisiadau cynllunio ar gyfer DNS yn cael eu cyhoeddi gan Weinidogion Cymru a'r awdurdod cynllunio lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i Weinidogion Cymru ar unrhyw gais cynllunio DNS cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu rhoi ar y ffeil gyhoeddus.

	Cyfeiriad neu leoliad y datblygiad arfaethedig
Datblygiad Arfaethedig yn:	Fferm Wynt Mynydd Fforch Dwm, 1 cilomedr i'r gogledd-ddwyrain o Donmawr, 4 cilomedr i'r de o Resolfen a 6 cilomedr i'r dwyrain o Gastell-nedd. Mae'r safle yn cynnwys Mynydd Fforch Dwm a Mynydd Blaenafon.
Rhoddaf hysbysiad fod:	Enw'r ceisydd: Mynydd Fforch Dwm Wind Energy 2021 Limited
yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sydd ar gyfer:	Disgrifiad o'r datblygiad arfaethedig: Fferm wynt ac arae solar, ynghyd a chyfarpar, seilwaith a Gwaith ategol cysylltiedig.
ac yn ystyried bod y cydsyniadau eilaidd a ganlyn yn gysylltiedig â'r cais arfaethedig a bod penderfyniad mewn cysylltiad â'r cydsyniadau hynny i'w wneud gan Weinidogion Cymru, neu gan berson a benodir gan Weinidogion Cymru at y diben hwnnw, neu y dylai gael ei wneud ganddynt:	Manylion o'r cydsyniadau eilaidd y tybia'r ceisydd y dylai Gweinidogion Cymru wneud penderfyniad arnynt (Adran 62H o Ddeddf Cynllunio Gwlad a Thref 1990; rhagnodir cydsyniadau eilaidd at ddibenion adran 62H gan Reoliadau Datblygiadau o Arwyddocâd Cenedlaethol (Meini Prawf Penodedig a Chydsyniadau Eilaidd Rhagnodedig) (Cymru) 2016) N/A
Gallwch archwilio copïau o: - y cais arfaethedig - y cynlluniau; a - dogfennau ategol eraill	Cyfeiriad y wefan https://mfdwindfarm.co.uk/consultation-library/
Ar- lein yn:	
Dylai unrhyw un sy' dymuno gwneud sylwadau ynglyn a'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/ yr asiant yn:	Cyfeiriad e-bost y ceisydd/ asiant hello@mfdwindfarm.co.uk Cyfeiriad y ceisydd: C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
Erbyn:	Dyddiad sy'n darparu cyfnod o 42 diwrnod, sy'n dechrau gyda'r dyddiad cyflwyno a chyhoeddi 23/01/2023 (49 diwrnod o 5/12/22)
Llofnod:	Savills (ar ran Mynydd Fforch Dwm Wind Energy 2021 Limited)
Dyddiad:	05/12/2022

Address 1	Address 2	Address 3	Address 4	Address 5	Address 6	Address 7
23 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
2 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
21 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
19 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
43 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
46 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
8 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
5 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
2 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
5 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
Glenview	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9ST	
47 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
21 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
19 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
13 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
5 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
Church House Annexe	Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
Highbury	Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
25 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
12 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
17 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
Tonmawr Farm	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9ST	
Uwch Y Glyn	Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9TA	
6 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
Grenside	8 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP	
11 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
45 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
18 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
30 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
3 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
4 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
34 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
9 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
6 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
4 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
7 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
31 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
18 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		

10 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
7 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
1 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
Brynhyfryd House	Blaenafon	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SY
29 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
26 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
12 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
Tyn Y Coed	Lane to Fforch Dwm Farm	Pontrhydyfen	Port Talbot	Neath Port Talbot	SA12 9SS
16 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
16 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
49 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
27 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
8 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
36 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
Pelenna House	Lane From Fforch Dwm Road To Pelenna House	Pontrhydyfen	Port Talbot	Neath Port Talbot	SA12 9SS
44 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
7A Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
3 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
18A Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
27 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
8 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
17 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
25 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
20 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
18B Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
1 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP	
32 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
26 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
20 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
40 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
35 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
Ael Y Bryn	Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9TA
4 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
6 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
3 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
10 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
37 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
1A Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	

30 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
15 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
5 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
29 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
2 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
42 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
Fir Tree	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9ST	
Tycapel Newhouse	Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US	
48 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
14 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
28 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
23 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
7 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
2 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
3 Abergwernffrwd Row	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UP		
7 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
28 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
17A Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
13 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
St Teilo's Church	Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
6 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
1 Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU	
22 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
11 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
9 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
1 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
41 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
4 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
Fforch Dwm Farm	Fforch Dwm Road	Pontrhydyfen	Port Talbot	Neath Port Talbot	SA12 9SS	
24 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
15 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
33 Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR		
Church House	Railway Terrace	Fforch Dwm Road	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SU
24 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
14 Blaenavon Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9US		
Rhyfain	Johns Terrace	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9UR	
Blaenafon Farm	Blaenafon	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9TA	
Tir Callwen	Blaenafon	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9TA	
Brynawel	Blaenafon	Tonmawr	Port Talbot	Neath Port Talbot	SA12 9SY	

Welsh Row Garage Blaenavon Terrace Tonmawr Port Talbot Neath Port Talbot SA12 9US

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.4 – Copy of the newspaper notice

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report

savills

facebook.com/WalesOnline

Public Notices

Traffic & Roads

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT
(A4109 MAIN ROAD, A4109 NEW ROAD, ABERDULAIS ROUNDABOUT,
ACCESS TO ABERDULAIS ROUNDABOUT AND B4344 FROM A4109 TO
DULAIS FACH ROAD, ABERDULAIS)
(REVOCATION) AND (30 MPH SPEED LIMIT)
ORDER 2022

NOTICE is hereby given that the Neath Port Talbot County Borough Council in pursuance of its powers as contained in Section 84 of the Road Traffic Regulation Act 1984 intends to make a Speed Restriction Order the general effect of which is set out in the Schedule below.

A copy of the draft Order, plan and statement of reasons can be inspected on the Council's Internet Website <https://www.npt.gov.uk/traffic-regulation-orders-tros>.

Any objections should be submitted in writing, setting out the reasons thereof, to reach the Head of Engineering and Transport, The Quays, Baglan Energy Park SA11 2GG by 26th December 2022.

If you have any further enquiries regarding this notice please send your email to environment@npt.gov.uk

SCHEDULES

Schedule 1 - Revocation
To revoke any speed limit orders in so far as it relates to the length of road set out in Schedule 2 of this Order

Schedule 2 - Proposed 30mph Speed Limit

1. A4109 Main Road
From its junction with Aberdulais Roundabout for a distance of approximately 948 metres in a north easterly direction.

2. A4109 New Road
From a point approximately 948 metres in a north easterly direction from its junction with Aberdulais Roundabout for a distance of approximately 750 metres in a north easterly direction.

3. Aberdulais Roundabout
For its entire length, a distance of approximately 365 metres.

4. Access to Aberdulais Roundabout
From its junction with Aberdulais Roundabout for a distance of approximately 100 metres in a south easterly direction.

5. B4344 From A4109 to Dulais Fach Road
From a point approximately 10 metres in a south westerly direction from its junction with Station Road for a distance of approximately 298 metres in a south westerly direction.

DATED 5th DECEMBER 2022
W. SHIFFRINS
HEAD OF LEGAL & DEMOCRATIC SERVICES

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT
(B4287 EFALL FACH / B4287 CIMLA TO EFALL FACH / B4287
FROM CIMLA TO PONTRIDRYFEN)
(REVOCATION) AND (30 MPH SPEED LIMIT)
ORDER 2022

NOTICE is hereby given that the Neath Port Talbot County Borough Council in pursuance of its powers as contained in Section 84 of the Road Traffic Regulation Act 1984 intends to make a Speed Restriction Order the general effect of which is set out in the Schedule below.

A copy of the draft Order, plan and statement of reasons can be inspected on the Council's Internet Website <https://www.npt.gov.uk/traffic-regulation-orders-tros>.

Any objections should be submitted in writing, setting out the reasons thereof, to reach the Head of Engineering and Transport, The Quays, Baglan Energy Park SA11 2GG by 26th December 2022.

If you have any further enquiries regarding this notice please send your email to: environment@npt.gov.uk

SCHEDULES

Schedule 1 - Revocation
To make any speed limit orders in so far as it relates to the length of road set out in Schedule 2 of this Order

Schedule 2 - Proposed 30mph Speed Limit

1. B4287 Efall Fach / B4287 Cimla to Efall Fach / B4287 From Cimla to Pontridryfen
From its junction with Tonnaw Road for a distance of approximately 1340 metres in a north westerly then westerly direction.

DATED 5th DECEMBER 2022
W. SHIFFRINS
HEAD OF LEGAL & DEMOCRATIC SERVICES

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT
(B4290 FROM LLANDARCY TO JERSEY MARINE, LLANDARCY, NEATH)
(REVOCATION) AND (30 MPH SPEED LIMIT)
ORDER 2022

NOTICE is hereby given that the Neath Port Talbot County Borough Council in pursuance of its powers as contained in Section 84 of the Road Traffic Regulation Act 1984 intends to make a Speed Restriction Order the general effect of which is set out in the Schedule below.

A copy of the draft Order, plan and statement of reasons can be inspected on the Council's Internet Website <https://www.npt.gov.uk/traffic-regulation-orders-tros>.

Any objections should be submitted in writing, setting out the reasons thereof, to reach the Head of Engineering and Transport, The Quays, Baglan Energy Park SA11 2GG by 26th December 2022.

If you have any further enquiries regarding this notice please send your email to: environment@npt.gov.uk

SCHEDULES

Schedule 1 - Revocation
To make any speed limit orders in so far as it relates to the length of road set out in Schedule 2 of this Order

Schedule 2 - Proposed 30mph Speed Limit

1. B4290 From Llandarcy to Jersey Marine
From a point approximately 92 metres in a north westerly direction from its junction with Cae-y-Beddu for a distance of approximately 320 metres in a south easterly direction.

DATED 5th DECEMBER 2022
W. SHIFFRINS
HEAD OF LEGAL & DEMOCRATIC SERVICES

Any item any price free online

MONDAY, DECEMBER 5, 2022 SOUTH WALES EVENING POST 37

Planning

The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)
PERMISSION NOTICE UNDER ARTICLES 8 AND 9(2)
(to be served on owners and / or occupiers of adjoining land, community consultees and relevant persons; displayed by site notice on or near the location of the proposed development and published in a newspaper in the locality)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be published by the Welsh Ministers and the relevant local planning authority, any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development:	Address or location of the proposed development
	Mynydd Fforch Dwm Wind Farm, 1km north-east of Tonnaw, 4km south of Resolven and 6km east of Neath. The Site consists of Mynydd Fforch Dwm and Mynydd Blaenavon.

I give notice that:	Applicant's Name
	Mynydd Fforch Dwm Wind Energy 2021 Limited

is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is:	Description of the proposed development
	Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.

And considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:	Details of secondary consents in respect of which the applicant considers a decision should be made by the Welsh Ministers (Section 62H of the Town and Country Planning Act 1990, as prescribed by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016)
	N/A

You may inspect copies of:	Address of website
- the proposed application; - the plans; and - other supporting documents online at:	https://mfdwindfarm.co.uk/consultation-library/

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:	Email address of the applicant/agent
	hello@mfdwindfarm.co.uk

By:	Date giving a period of 42 days, beginning with the date of service and publication
	23/01/2023 (which is 42 days from 5/12/22)

Signed:	Date
Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)	05/12/2022

Gorchymyn Datblygiadau o Arwyddocaedd Cenedlaethol (Gweithdrefn) (Cymru) 2016
CYHOEDDUSRWYDD AC YMGYNGHORIAD CYN GWNEUD CAIS AM GANIATAD CYNLLUNIO HYSBYSIAD O DAN EIRIYGLAU B A 9(2)
Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cytfe i wneud sylwadau'n unolgyrchol i'r datblygwyr ar Datblygiad o Arwyddocaedd Cenedlaethol (DNS) arfaethedig cyn cyflwyno cais cynllunio i Weinidogion Cymru. Bydd ceisiadau cynllunio ar gyfer DNS yn cael eu cyhoeddi gan Weinidogion Cymru a'r awdurdod cynllunio lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i Weinidogion Cymru ar unrhyw gais cynllunio DNS cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu rhoi ar y ffeil gyhoeddus.

Datblygiad Arfaethedig yn:	Cyfeiriad neu leoliad y datblygiad arfaethedig
	Fferm Wyt Mynydd Fforch Dwm, 1 cilomedr i'r gogledd-ddwyrain o Donnawr, 4 cilomedr i'r de o Resolven a 6 cilomedr i'r dwyrain o Gastell-nedd. Mae'r safle yn cynnwys Mynydd Fforch Dwm a Mynydd Blaenavon.

Rhodddat hysbysiad fod:	Enw'r celysdd:
	Mynydd Fforch Dwm Wind Energy 2021 Limited

yn briwriadu gwneud cais i Weinidogion Cymru am ganiatad cynllunio mewn perthynas â Datblygiad o Arwyddocaedd Cenedlaethol sydd ar ofn:	Disgrifiad o'r datblygiad arfaethedig:
	Fferm wynt ac arae solar, ynghyd â chyfarpar, seilwaith a gwaith ategol cysylltiedig.

ac yn ystyried bod y cydsyniadau eilaidd a ganiatad yn gysylltiedig â'r cais arfaethedig a bod penderfyniad mewn cysylltiedig â'r cydsyniadau hynny i'w gwneud gan Weinidogion Cymru, neu gan berson a benodir gan Weinidogion Cymru at y diben hwnnw, yn dylai gael ei wneud ganddynt:	Manylion o'r cydsyniadau eilaidd y tybia'r celysdd y dylai Weinidogion Cymru wneud penderfyniad amyn (Adran 62H o Ddeddf Cynllunio Gwlad a Thref 1990; rhagnodir cydsyniadau eilaidd at ddibenion adran 62H gan Reoliadau Datblygiadau o Arwyddocaedd Cenedlaethol (Meini Prawf Penodedig a Chydsyniadau Eilaidd Rhagnodedig) (Cymru) 2016)
	N/A

Gallwch archwilio copïau o:	Cyfeiriad y wefan
- y cais arfaethedig - y cynlluniau; a - dogfenau ategol eraill Ar-lein yn:	https://mfdwindfarm.co.uk/consultation-library/

Dylai unrhyw un sy' dymuno gwneud sylwadau ynghyd â'r datblygiad arfaethedig hwn ysgrifennu at y celysdd/yr asiant yn:	Cyfeiriad e-bost y celysdd/asiant
	hello@mfdwindfarm.co.uk

Erbyn:	Cyfeiriad y celysdd:
	C/O Savills, 2 Kingsway, Cardiff, CF10 3FD

Dyddiad sy'n darparu cyfnod o 42 diwrnod, sy'n dechrau gyda'r dyddiad cyflwyno a chyhoeddi	Dyddiad y celysdd:
	23/01/2023 (49 diwrnod o 5/12/22)

Ulofnod:	Dyddiad:
Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)	05/12/2022

SWANSEA COUNCIL
TOWN AND COUNTRY PLANNING ACTS 1990-2004
TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012

Notice is hereby given that applications have been received by the City and County of Swansea as Local Planning Authority for planning permission for the following developments:

A. DEVELOPMENTS WHICH ARE LOCATED IN THE FOLLOWING CONSERVATION AREAS:

SITE:
Mumbles Conservation Area
40 Oakland Road Mumbles Swansea SA3 4AH
13 William Street Mumbles Swansea SA3 4LJ

PROPOSED DEVELOPMENT:
Rear dormer loft conversion with front roof lights (Ref: 2022/2726/FUL)
Conversion of detached garage to a home office, music room, utility room with addition of door, new fenestration alterations and a rooftop (Ref: 2022/2752/FUL)
Retention and completion of decking and erection of privacy screen (Ref: 2022/2776/FUL)

Rhosolli Conservation Area
1 Bay View Rhosolli Swansea SA3 1PN

Members of the public can view all documents online at <http://property.swansea.gov.uk>

Should you wish to make any observations on these proposals, they can be made online at <https://property.swansea.gov.uk> no later than 21 days beginning with the date of publication of this Notice.

If your comment is submitted online, you will receive an acknowledgement, however via any other method you will not.

Under the Local Government (Access to Information) Act 1985, your comments, including your name and address, are open to inspection by the public upon request.

HEAD OF PLANNING AND CITY REGENERATION
Dated: 5th December 2022

Probate & Trustee
MARGARET LLOYD PUXLEY
Deceased
Pursuant to the Trustee Act 1925 anyone having a claim against or an interest in the Estate of the deceased, late of Cherry Trees, 73 Birchgrove Road, Birchgrove, Swansea, Aberystwyth SA7 9PL, who died on 04/07/2022, must send written particulars to the address below by 06/02/2023, after which date the Estate will be distributed having regard only to claims and interests notified.
Christopher Shaw & Co, FCP Solicitors, Venture Court, Waterside Business Park, Valley Way, Enterprise Park, Swansea, SA6 8AH. Ref: 69678/ACR

GAAP
Get the latest
Accountancy & Finance
jobs direct to your inbox
gaapweb.com

Any item
any price
free online

marketplace.co.uk
Your local place to buy and sell

Local pick up, what a great idea

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.5 – Copy of letter and notice given to community consultees

05 December 2022

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow square background.

2 Kingsway
Cardiff CF10 3FD
T: +44 (0) 29 20 368900
savills.com

Dear Sir / Madam,

On behalf of our client, Mynydd Fforch Dwm Wind Energy 2021 Limited, Savills is instructed to undertake pre-application consultation in relation to land at Mynydd Fforch Dwm. Full planning permission will be sought for:

"Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works."

We are required to undertake Pre-Application Consultation ("PAC") for a period of 42 days in advance of the planning application being submitted to Planning and Environment Decisions Wales (PEDW). In this regard, we are writing to confirm that the PAC process will run from 05 December 2022 until 23 January 2023 (which is 49 days from 05/12/2022).

The attached notice provides instructions on how the draft application can be viewed and how comments on the proposals can be submitted. You are able to view the application online at <https://mfdwindfarm.co.uk/consultation-library/>. Computer facilities are available to view this information by visiting Cwmafan Library, Depot Road, Port Talbot, SA12 9DF or Neath Library, 35 Victoria Gardens, Neath, SA11 3BA.

Please note, this PAC provides the opportunity to comment directly to Mynydd Fforch Dwm Wind Energy 2021 Limited, as the applicant, on the proposed development prior to the formal submission of the planning application to PEDW. Any subsequent planning application will be subject to statutory consultation by PEDW and any comments provided in response to this notice will not prejudice your ability to make further representations to PEDW on any related planning application. You should note that any comments submitted may be placed on the public file.

Yours faithfully,

A stylized, handwritten signature of the word "Savills" in dark ink.

Savills

Enclosed: Notice

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 8 AND 9(2)

(to be served on owners and / or occupiers of adjoining land, community consultees and relevant persons; displayed by site notice on or near the location of the proposed development and published in a newspaper in the locality.)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at :	Address or location of the proposed development Mynydd Fforch Dwm Wind Farm, 1km north-east of Tonmawr, 4km south of Resolven and 6km east of Neath. The Site consists of Mynydd Fforch Dwm and Mynydd Blaenavon.
I give notice that:	Applicant's Name Mynydd Fforch Dwm Wind Energy 2021 Limited
is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is:	Description of the proposed development Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.
And considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:	Details of secondary consents in respect of which the applicant considers a decision should be made by the Welsh Ministers (Section 62H of the Town and Country Planning Act 1990, as prescribed by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016) N/A
You may inspect copies of: - the proposed application; - the plans; and - other supporting documents online at:	Address of website https://mfdwindfarm.co.uk/consultation-library/
Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:	Email address of the applicant/agent hello@mfdwindfarm.co.uk
	Address of the applicant C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
By:	Date giving a period of 42 days, beginning with the date of service and publication 23/01/2023 (which is 49 days from 5/12/22)
Signed:	Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)
Date:	05/12/2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
CYHOEDDUSRWYDD AC YMGYNGHORIAD CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGLAU 8 A 9(2)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar Ddatblygiad o Arwyddocâd Cenedlaethol (DNS) arfaethedig cyn cyflwyno cais cynllunio i Weinidogion Cymru. Bydd ceisiadau cynllunio ar gyfer DNS yn cael eu cyhoeddi gan Weinidogion Cymru a'r awdurdod cynllunio lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i Weinidogion Cymru ar unrhyw gais cynllunio DNS cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu rhoi ar y ffeil gyhoeddus.

	Cyfeiriad neu leoliad y datblygiad arfaethedig
Datblygiad Arfaethedig yn:	Fferm Wynt Mynydd Fforch Dwm, 1 cilomedr i'r gogledd-ddwyrain o Donmawr, 4 cilomedr i'r de o Resolfen a 6 cilomedr i'r dwyrain o Gastell-nedd. Mae'r safle yn cynnwys Mynydd Fforch Dwm a Mynydd Blaenafon.
Rhoddaf hysbysiad fod:	Enw'r ceisydd: Mynydd Fforch Dwm Wind Energy 2021 Limited
yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sydd ar gyfer:	Disgrifiad o'r datblygiad arfaethedig: Fferm wynt ac arae solar, ynghyd a chyfarpar, seilwaith a Gwaith ategol cysylltiedig.
ac yn ystyried bod y cydsyniadau eilaidd a ganlyn yn gysylltiedig â'r cais arfaethedig a bod penderfyniad mewn cysylltiad â'r cydsyniadau hynny i'w wneud gan Weinidogion Cymru, neu gan berson a benodir gan Weinidogion Cymru at y diben hwnnw, neu y dylai gael ei wneud ganddynt:	Manylion o'r cydsyniadau eilaidd y tybia'r ceisydd y dylai Gweinidogion Cymru wneud penderfyniad arnynt (Adran 62H o Ddeddf Cynllunio Gwlad a Thref 1990; rhagnodir cydsyniadau eilaidd at ddibenion adran 62H gan Reoliadau Datblygiadau o Arwyddocâd Cenedlaethol (Meini Prawf Penodedig a Chydsyniadau Eilaidd Rhagnodedig) (Cymru) 2016) N/A
Gallwch archwilio copïau o: - y cais arfaethedig - y cynlluniau; a - dogfennau ategol eraill	Cyfeiriad y wefan https://mfdwindfarm.co.uk/consultation-library/
Ar- lein yn:	
Dylai unrhyw un sy' dymuno gwneud sylwadau ynglyn a'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/ yr asiant yn:	Cyfeiriad e-bost y ceisydd/ asiant hello@mfdwindfarm.co.uk Cyfeiriad y ceisydd: C/O Savills, 2 Kingsway, Cardiff, CF10 3FD
Erbyn:	Dyddiad sy'n darparu cyfnod o 42 diwrnod, sy'n dechrau gyda'r dyddiad cyflwyno a chyhoeddi 23/01/2023 (49 diwrnod o 5/12/22)
Llofnod:	Savills (ar ran Mynydd Fforch Dwm Wind Energy 2021 Limited)
Dyddiad:	05/12/2022

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.6 – Copy of letter and notice given to specialist consultees

05 December 2022



2 Kingsway
Cardiff CF10 3FD
T: +44 (0) 29 20 368900
savills.com

Dear Sir / Madam,

On behalf of our client, Mynydd Fforch Dwm Wind Energy 2021 Limited, Savills is instructed to undertake pre-application consultation in relation to land at Mynydd Fforch Dwm. Full planning permission will be sought for:

“Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.”

We are required to undertake Pre-Application Consultation (“PAC”) for a period of 42 days in advance of the planning application being submitted to Planning and Environment Decisions Wales (PEDW). In this regard, we are writing to confirm that the PAC process will run from 05 December 2022 until 23 January 2023 (which is 49 days from 05/12/2022).

The attached notice provides instructions on how the draft application can be viewed and the how comments on the proposals can be submitted.

Please note, this PAC provides the opportunity to comment directly to Mynydd Fforch Dwm Wind Energy 2021 Limited, as the applicant, on the proposed development prior to the formal submission of the planning application to PEDW. Any subsequent planning application will be subject to statutory consultation by PEDW and any comments provided in response to this notice will not prejudice your ability to make further representations to the Council on any related planning application. You should note that any comments submitted may be placed on the public file.

Yours faithfully,

A handwritten signature in black ink that reads "Savills".

Savills

Enclosed: Notice

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION - NOTICE UNDER ARTICLE 9(3)

(to be served on specialist consultees, as defined by article 2 of the Developments of National Significance (Procedure) (Wales) Order 2016 [as amended].)

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 9(3) of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended).

Proposed development at :	Address or location of the proposed development Mynydd Fforch Dwm Wind Farm, 1km north-east of Tonmawr, 4km south of Resolven and 6km east of Neath. The Site consists of Mynydd Fforch Dwm and Mynydd Blaenavon.
I give notice that:	Applicant's Name Mynydd Fforch Dwm Wind Energy 2021 Limited
is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is:	Description of the proposed development Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.
And considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:	Details of secondary consents in respect of which the applicant considers a decision should be made by the Welsh Ministers (Section 62H of the Town and Country Planning Act 1990, as prescribed by the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016) N/A
A copy of the proposed application; plans; and other supporting documents are attached/can be viewed online (delete as appropriate) at:	Address of website https://mfdwindfarm.co.uk/consultation-library/
In accordance with the requirements of article 10 of the Developments of National Significance (Procedure) (Wales) Order 2016, a consultation response must be sent to:	Email address of the applicant/agent hello@mfdwindfarm.co.uk
By:	Date giving a period of 42 days, beginning with the date of service 23/01/2023 (which is 49 days from 5/12/22)
Signed:	Savills (on behalf of Mynydd Fforch Dwm Wind Energy 2021 Limited)
Date:	05/12/2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
YMGYNGHORIAD CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGL 9(3)

Pwrpas yr hysbysiad hwn: mae'r hysbysiad hwn yn cynnwys cais ffurfiol am ymateb i'r ymgynghoriad cyn ymgeisio o dan erthygl 9(3) o Orchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016.

	Cyferiad neu leoliad y datblygiad arfaethedig
Datblygiad arfaethedig yn:	Fferm Wynt Mynydd Fforch Dwm, 1 cilometr i'r gogledd-ddwyrain o Donmawr, 4 cilometr i'r de o Resolfen a 6 cilometr i'r dwyrain o Gastell-nedd. Mae'r safle yn cynnwys Mynydd Fforch Dwm a Mynydd Blaenafon.
Rhoddaf hysbysiad fod:	Enw'r ceisydd Mynydd Fforch Dwm Wind Energy 2021 Limited
Yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sydd ar gyfer:	Disgrifiad o'r datblygiad arfaethedig Fferm wynt ac arae solar, ynghyd a chyfarpar, seilwaith a gwaith ategol cysylltiedig.
Ac yn ystyried bod y cydsyniadau eilaidd a ganlyn yn gysylltiedig â'r cais arfaethedig a bod penderfyniad mewn cysylltiad â'r cydsyniadau hynny i'w wneud gan Weinidogion Cymru, neu gan berson a benodir gan Weinidogion Cymru at y diben hwnnw, neu y dylai gael ei wneud ganddynt:	Manylion o'r cydsyniadau eilaidd y tybia'r ceisydd y dylai Gweinidogion Cymru wneud penderfyniad arnynt (Adran 62H o Ddeddf Cynllunio Gwlad a Thref 1990; rhagnodir cydsyniadau eilaidd at ddibenion adran 62H gan Reoliadau Datblygiadau o Arwyddocad Cenedlaethol (Meini Prawf Penodedig a Chydsyniadau Eilaidd Rhagnodedig) (Cymru) 2016) N/A
Mae copi o'r cais arfaethedig; planiau; a dogfennau ategol eraill wedi eu hatodi yma/ a'r gael i'w harchwilio ar lein yn:	Cyfeiriad y wefan https://mfdwindfarm.co.uk/consultation-library/
Yn unol a gofynion erthygl 10 o Orchymyn Datblygiadau o Arwyddocad Cenedlaethol (Gweithdrefn) (Cymru) 2016, rhaid anfon ymateb i'r ymgynghoriad at:	Cyfeiriad e-bost y ceisydd/ asiant hello@mfdwindfarm.co.uk
Erbyn:	Dyddiad sy'n darparu cyfnod o 42 diwrnod, sy'n dechrau gyda'r dyddiad cyflwyno 23/01/2023
Llofnod:	Savills (a'r ran Mynydd Fforch Dwm Wind Energy 2021 Limited)
Dyddiad:	05/12/2022

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix A.7 – Key and photos of site notices erected on and around the Site

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Mynydd Fforch Dwm Wind Farm and Solar Array

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Appendix B - Responses

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Appendix B.1 Specialist responses

Mynydd Fforch Dwm Wind Energy
2021 Limited

hello@mfdwindfarm.co.uk

Eich cyf/Your ref:

Ein cyf/Our ref: DNS 3255801

Dyddiad/Date: 18 January 2023

Dear Sir/Madam

Mynydd Fforch Dwm Wind Farm - Pre Application

Thank you for your letter of 5 December 2022 from Savills consulting us on the above proposed development of national significance (DNS).

Advice

This advice is given in response to a statutory pre-planning application consultation regarding the proposed Mynydd Fforch Dwm Wind Farm.

Cadw have identified concerns with the application and require further information.

The national policy and Cadw's role in planning are set out in Annex A.

Assessment

The application will be accompanied by an environmental statement prepared by Savills, with Chapter 12, Archaeology and Cultural Heritage being based on information provided in a historic desk-based assessment, produced by SLR, included as Appendix 12.1 of the environmental statement. These works have considered the impact of the proposed windfarm on the designated historic assets and their settings identified in Annex B, as being inside 5km of the proposed development and in its zone of theoretical visibility and, apart from scheduled monument GM458 Cwm Pelenna Colliery Ventilation Furnace and listed building 22888 Cwm Pelenna ventilation stack, has concluded that there will be no significant effect. We concur with this conclusion.

Scheduled monument GM458 Cwm Pelenna Colliery Ventilation Furnace comprises a unique surviving example of a colliery ventilation furnace with hillside flue, which is now crossed by a track that the proposed development seeks to use for access. This will require the track to be widened and this work will have a direct impact on the scheduled



monument and would have a significant adverse effect. The environmental statement indicates that this impact could be mitigated by the scheduled monument being crossed by a “floating road”: However, no details of how this will be constructed and what the effect it will have on the underlying archaeological resource is given, although it is suggested that there will be no damage. Section 6.1.24 of Planning Policy Wales states that:-

“Where nationally important archaeological remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument”

Whether the proposed “floating road” will protect the scheduled monument, or not, will therefore be material consideration in the determination of the application for the windfarm, but currently there is insufficient information on this matter. This is a specific historic environment issue and would be best determined by the applicant submitting a scheduled monument consent application for the “floating road”, in advance of, or concurrent with, the planning application, so that the results of that application can be presented to the Inspector determining the planning application.

The submission of the scheduled monument consent application will require a Heritage Impact Assessment to be produced and this should also consider the impact of the proposed development on the setting of the scheduled monument and also the impact on the setting of listed building 22888 Cwn Pelenna ventilation stack.

Finally, there may be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Glamorgan Gwent Archaeological Trust.

Yours sincerely,

Jenna Arnold
Diogelu a Pholisi/ Protection and Policy

Annex A

Our role

Details about our role in the DNS process are available [online](#).

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Conservation Principles for the Sustainable Management of the Historic Environment in Wales, Technical Advice Notes and related guidance.

PPW ([Chapter 6 – The Historic Environment](#)) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

Annex B

Within a 5km developer bare earth ZTV:

Scheduled Monuments:

GM054 Buarth y Gaer, Mynydd y Gaer
GM055 Mynydd y Gaer (Lower) Camp
GM098 Pen-y-Castell
GM244 Nant Herbert Camp
GM258 Blaen-Cwmbach Camp
GM264 Cefn Morfydd Dyke & Earthwork
GM276 Pen-Rhiw-Angharad Round Cairns
GM277 Blaen-Cwmbach Earthwork
GM279 Foel Fynyddau Round Cairn
GM366 Camp 280m S of Melin Court Brook
GM367 Roman Marching Camp South West of Melin Court Brook
GM385 Three Round Cairns on Carn Caca
GM447 Glynclorrwg Mineral Railway (Parsons Folly) Section on Cefn Morfudd
GM458 Cwm Pelenna Colliery Ventilation Furnace
GM489 Ynysmaerdy Railway Incline
GM551 Deserted Rural Settlement North of Foel Fynyddau
GM566 Cwmafan copper works flue
GM577 Carn Caglau cairn
GM581 Cefn Mawr cairn

Registered Historic Landscape:

HLW (WGI/MGI) 2 Margam Mountain

Listed Buildings:

	Railway bridge near Crythan Farm (partly in Briton Ferry and Neath communities)	II
11698	Church of Saint Cattwg	II*
11767	Hugh Vaughan & Co Ltd	II
11780	Scotch Fold	II
11857	Ynysafan Tramroad Bridge	II
15845	Cwm Pelenna ventilation stack	II
22888	Church of St Michael	II
23018	Penuel Chapel	II
23020	Seion Fforest Calvinistic Methodist Chapel	II
23079	Cymmer Viaduct	II
23843	Gates, gate piers, walls and railings at Church of Saint Cattwg	II
82085		



82088	Milestone on A4230	II
82089	Monument in churchyard of St Cattwg	II
82273	Bridge over Neath Canal at Ynysarwed	II



The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Mynydd Fforch Dwm Wind Energy 2021 Limited

[By Email: hello@mfdwindfarm.co.uk]

16 December 2022

Dear Sir or Madam

**PRE-APPLICATION ENQUIRY: DNS/3255801 Mynydd Fforch Dwm Wind Farm NSIP
ON**

Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works; Fforch Dwm Farm, Tonmawr, Port Talbot, SA12 9SS

Thank you for your consultation letter of 5 December 2022 seeking the views of the Coal Authority on the above.

The application site falls within the defined Development High Risk Area.

The Coal Authority records indicate the presence of 32 recorded mine entries (shafts and adits) within, or within close proximity of the planning boundary and that thick coal seams outcropped across the site, which may have been worked from the surface.

In terms of the submitted Coal Mining Risk Assessment (October 2020, prepared by SLR Consulting Ltd), which has been informed from appropriate geological and mining information, my personal opinion is that it would be sufficient to accompany any subsequent future planning application to meet the requirements of National policy.

In terms of the proposed layout, we note that all of the turbines are outside the defined development high risk area and are not affected by the many mine entries

within the wider site. Whilst the report does not appear to consider the thick coal seam outcrops within the site, but confirms that the site is stable from a mining viewpoint, those other aspects of the proposals (i.e. the proposed switch gear buildings and the arrays) are either outside of the high risk area or meet with the Coal Authority's exemption criteria.

On account of the above, the **likely Coal Authority recommendation would be no objections.**

I hope this is helpful however please do not hesitate to contact me if you would like to discuss this matter further.

Yours faithfully

Chris MacArthur

Chris MacArthur *B.Sc.(Hons), DipTP, MRTPI*
Planning Liaison Manager

General Information for the Applicant

Under the Coal Industry Act 1994 any intrusive activities, including initial site investigation boreholes, and/or any subsequent treatment of coal mine workings/coal mine entries for ground stability purposes require the prior written permission of The Coal Authority, since such activities can have serious public health and safety implications. Failure to obtain permission will result in trespass, with the potential for court action. In the event that you are proposing to undertake such work in the Forest of Dean local authority area our permission may not be required; it is recommended that you check with us prior to commencing any works. Application forms for Coal Authority permission and further guidance can be obtained from The Coal Authority's website at:

<https://www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property>

Building over or within the influencing distance of a mine entry (shaft or adit) can be dangerous and has the potential for significant risks to both the development and the occupiers if not undertaken appropriately. The Coal Authority would draw your attention to our adopted policy regarding new development and mine entries:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

Disclaimer

The above consultation response is provided by the Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

Sara Dryhurst-Roberts

From: Allison Chippendale <Allison.Chippendale@hse.gov.uk> on behalf of NSIP.Consultations@hse.gov.uk
Sent: Friday, December 9, 2022 2:31 PM
To: Sara Dryhurst-Roberts
Subject: RE: Pre Application Consultation - Mynydd Fforch Dwm

Sarah

In response to your email below HSE's statutory response is the same as advised in October 2022

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

The proposed project/development does not currently fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).

Please note, if prior to the granting of a development consent order for this proposed development, Hazardous Substances Consent is granted for a Major Hazard Installation or there is notification of a Major Accident Hazard Pipeline within or in the vicinity of the development, HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

There are no licensed explosive sites in the vicinity so HSE has no comment to make in this regard.

NSIP APPLICATIONS TEAM

1.2 Redgrave Court, Merton Road, Bootle. L20 7HS

07765643042 | *: HAZSUBCON.CEMHD5@hse.gov.uk

The current COVID 19 crisis is making receipt of, and access to, post extremely problematic. HSE would be grateful if you could avoid sending hard copy mail wherever possible and instead send electronic versions. Please let us know by phone or email of any instances where this is not possible and hard copy mail needs urgent attention. Mae'r argyfwng COVID 19 presennol yn ei gwneud hi'n anodd eithriadol i dderbyn, a chael mynediad i bost. Byddai HSE yn ddiolchgar petasech yn peidio ag anfon post copi caled lle mae'n bosibl ac yn hytrach fersiynau electronig. Rhowch wybod dros y ffôn neu ebost am unrhyw achosion lle nad yw hyn yn bosibl ac mae post copi caled angen sylw ar frys.

From: Sara Dryhurst-Roberts <sara.dryhurstroberts@savills.com>
Sent: 05 December 2022 13:56



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

Roger Thomas BA(Hons), MSc

tancgc.gov.uk
mawwfire.gov.uk

Savills
2 Kingsway
Cardiff
CF10 3FD

FAO: Sara Dryhurst-Roberts

*Gofynner am/
Please ask for:*

Watch Manager Lodder-Rodda

Rhif Est/Extn. No.

8806

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My Ref:

HLR/KDT/00226504

Dyddiad/Date:

06 December 2022

Dear Madam,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

RE: Land at Mynydd Fforch Dwm

APPLICATION NUMBER: N/A

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development:

- The following concerns are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.

Access and facilities for the Fire and Rescue Service in accordance with Approved Document B (Wales) 2020, B5, Section 16 Fire mains and hydrants and Section 17 Vehicle access.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

Y Pencadlys, Heol Llwyn Pisgwydd, Caerfyrddin, Sir Gâr, SA31 1SP
Headquarters, Lime Grove Avenue, Carmarthen, Carmarthenshire, SA31 1SP

post@tancgc.gov.uk
mail@mawwfire.gov.uk

0370 60 60 699

<https://www.ukfrs.com/index.php/promos/16847>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully

A handwritten signature in black ink, appearing to read 'H Lodder-Rodda', with a horizontal line underneath.

Watch Manager H Lodder-Rodda
Authorised Fire Safety Inspecting Officer
On behalf of the Mid and West Wales Fire and Rescue Authority

Enc

MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

OBSERVATIONS

PLANNING APPLICATION NO: N/4/22/0015/00
APPLICANT: MYNYDD FFORCH DWM WIND ENERGY 2021 LTD
LOCATION: MYNYDD FFORCH DWM WIND FARM, 1KM
NORTH-EAST OF TONMAWR, 4KM SOUTH OF
RESOLVEN AND 6KM EAST OF NEATH. THE
SITE CONSISTS OF MYNYDD FFORCH DWM
AND MYNYDD BLAENAVON.
PROPOSAL: PROPOSED ONSHORE WIND FARM AND SOLAR
ARRAY TOGETHER WITH ASSOCIATED
EQUIPMENT, INFRASTRUCTURE AND
ANCILLARY WORKS

The Highway Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	×
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☐
Objection – on the grounds set out below	☐
SAB Application Required	×

MY OBSERVATIONS ON THIS PAC PROPOSAL ARE AS FOLLOWS AND BASED ON THE DOCUMENTS BELOW:-

- Neath Port Talbot County Borough Council - Design Guide for Streets and Public Realm for Residential and Commercial Developments.
- Planning Policy Wales Technical Advice Note 18: Transport
- Schedule 3 of the Flood and Water Management Act (FWMA) 2010 requires surface water drainage for new developments to comply with Mandatory National Standards for Sustainable Drainage (SuDS). Reference to the Non-Statutory Ministerial National Standards and the CIRIA 753: The SuDS Manual is recommended.

HIGHWAYS

1. Prior to any planning approval being granted, an abnormal load trail run will be required.
2. It is noted that the proposed route for abnormal loads and construction traffic has been provided on plan along with the estimated number of construction traffic/delivery movements (including HGV's) to and from the site.
3. Prior to any work on site a statement is required regarding the delivery times and schedules for all abnormal load and construction traffic. Once approved these timings shall be adhered to throughout the life time of the project.
4. Prior to any work commencing on the wind farm, a traffic management scheme that details any alterations/amendments to the existing public highway(s) on the route from and including the A465 to the site location. These details shall include temporary speed reduction measures (if applicable), traffic regulation orders, removal of existing street furniture, junction widening, increased vehicular visibility splays, roundabouts, kerb alignment, and all other highway works necessary to allow the safe access of the turbine delivery vehicles and construction traffic. The highway works and any amendments to traffic regulation orders shall be approved by the highway authority prior to any works commencing on site and shall be reinstated back to its original state on completion of the development.
5. Any substantial construction works or highway alterations (temporary or permanent) required along the public highway will be subject to a Road Safety Audit. Stages 1 to 4 in accordance with GG119 of the Design Manual for Roads and Bridges. Each stage of the Road Safety Audit shall be submitted for approval in writing by the local planning authority. All issues highlighted at each stage of the audit shall be addressed and submitted for the written approval of the local planning authority within 3 months of that stage of the Road Safety Audit.
6. Prior to works commencing on site a reinstatement management plan for any landscaping and earth reinstatement shall be submitted to and approved in writing by the local planning authority.
7. A management and maintenance regime shall be provided which shall include details of any ongoing maintenance post construction together with any security measures.
8. Prior to work commencing on site or to the public highway a construction method statement shall be submitted to and for the written approval of the local planning authority. The statement shall detail:-
 - The parking of vehicles of site operatives
 - Loading and unloading area for plant and materials
 - Storage of plant and materials used in the construction/highway works process
 - Wheel washing facilities where necessary

- Measures to control the emission of dust/dirt during the construction/highway works process
- A scheme for the recycling/disposing of waste resulting from the construction/highway works.
- A scheme for the erection of temporary warning signage to drivers of the presence of children and speed restrictions on the route to the site.

The approved statement shall be adhered to throughout the construction period.

9. A condition survey of the existing highway network along the proposed access route for the deliveries shall be undertaken and include the condition of the existing carriageway and footway, prior to work commencing on site and again on completion of the works on the wind farm. Any damage to the public highway identified as a result of the increased volume of construction vehicles shall be repaired in accordance with a scheme to be agreed in writing with the local planning authority. The pre and post construction condition survey shall include but not be limited to, the following:-

- CCTV Camera surveys of all culvert crossings.
- Photographic survey of all related structures (e.g.) headwalls and gullies.
- Drainage channels/ditches running alongside the lane access of Fforch Dwm Road/Railway Terrace.
- Proposed access/junction arrangements and associated drainage for the second phase of turbines for Bleanavon Mountain, together with the turbines delivered along Fforch Dwm Road.
- Survey of existing street furniture, lighting and overhead cables.
- All structures abutting and retaining the public highway, together with any widening of bends and highway pinch points that may require additional or new structural support.
- Proposed structural movement gages/tools to be implemented on all relevant structures, so that assessments can be made on any potential movements during operation.
- All surfacing of highway material including bitumen, antiskid surface and lining.
- The temporary removal and reinstatement of any signage and street name plates.
- All removals of projected house fixtures such as satellite dishes, hanging baskets, boundary treatments, external light fixtures.

10. SWTRA should be consulted as the delivery route is predominantly along their network from the proposed port of entry at Swansea.

HIGHWAY NOTES TO APPLICANT

1. For the implementation of the Traffic Regulation Orders you should contact the Project Manager – Engineering of Neath Port Talbot County Borough Council at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG. f.a.o Martin Brumby tel: 01639 686013 or email: m.brumby@npt.gov.uk who will advise you of the procedure for the implementation of the required Traffic

Regulations Orders. *** Please note this process can take up to 6 months – subject to the consultation process outcome.**

2. Consent under the Town and Country Planning General Permitted Development Order 1995 does not give consent for your apparatus to be erected in or on the Public Highway. For this you must notify the Highway Authority, in writing, that you propose to carry out the works under the provisions of the New Roads and Streetworks Act 1991 for the temporary signals. The address of the Highway Authority is, The Director of Environment, Neath Port Talbot County Borough Council, Streetworks Section, The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG (for the attention of Mr Gary Thomas, e-mail address g.thomas3@npt.gov.uk Tel. No. 01639-686327 c.c. Gary Thomas Streetworks Section.
3. In order to ensure the road works you are required to undertake are carried out to the satisfaction of the Local Planning Authority and subsequently adopted if you so wish you are advised prior to commencing any work on these works to contact the Head of Engineering and Transport Services at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG, telephone number (01639) 686868 or e-mail hdc@npt.gov.uk to agree the specification, enter an adoption agreement and arrange onsite inspection of your works.

Any agreement to adopt the roads relating to this development should be entered into with the Council prior to the commencement of development. Such an agreement will be under Section 38 of the Highways Act 1980 relating to the specification, timescale and subsequent adoption of the roads and a Bond to ensure that the Authority can complete the works if the Developer defaults on the roadworks.

4. Any amendments to the existing highway as a result of providing adequate access to the development shall require consent under a section 278 agreement of the Highways Act 1980. This agreement and the works thereof shall subject to approval of the scheme, detailed drawings, specifications and reinstatements. You are required to contact The Highway Development Control Section at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (Tel.No.01639 686868 e-mail hdc@npt.gov.uk This agreement shall be concluded before any deliveries or works commence on site.

Developers' attention is drawn to the provisions of Section 278 of the Highways Act, 1980 in cases where a development would require access or other works to be carried out within the existing highway. Where highway works to benefit a development require land adjacent to an existing highway to be constructed upon together with works on the existing public maintained highway, a hybrid S38/278 shall be used. Works that are to be undertaken within the existing public maintained highway only will require a S278 agreement. No Work shall be undertaken on the existing public maintained highway until the appropriate legal agreement has been entered into.

Any works undertaken on the public highway without the appropriate legal agreement with the Highway Authority, the Highway Authority has the right to request the developer to remove and/or reinstate that part of

the highway back to its original condition to the satisfaction of the Highway Authority.

A plan detailing the differences between the existing and proposed highway shall be submitted to form part of the legal agreement, this should be made up of two colours, green for the proposed area to be adopted and brown for the existing highway.

Developers are reminded that consent under the Town and Country Planning Act, 1990/91, conveys no approval for works to be undertaken affecting any part of the public highway, including verges and footways. The Developer must:-

(i) Obtain the approval of Neath Port Talbot County Borough Council as Highway Authority for the details of any works to be undertaken in the Public Highway.

(ii) Indemnify the Authority against all claims arising from such works, including claims under the Land Compensation Act.

(iii) Give not less than 1 calendar months' notice in writing of the date of commencement of the works.

As part of this process you are advised that any principle contractors and/or subcontractors that are on the Local Authority's framework approved list are permitted to undertake the works on the public highway, a list of these contractors are available from the Highway Authority's Highway Development Control Section on request.

5. Prior to any abnormal loads using the public highway you are requested to contact The Director of Environment, Neath Port Talbot County Borough Council, Streetworks Section, The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG (fao. Hasan Hasan Project Manager Bridge Assessment, (01639) 686463), to agree the suitability of the vehicles and weight limits of the route in relation to weight of vehicles and axle weights.

DRAINAGE

1. SAB approval will be required prior to any work commencing. To commence work is a breach of SAB approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby legal action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. Guidance and applications can be found on <https://www.npt.gov.uk/sab>
2. Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority.

No ground water shall ever be discharged into the proposed drainage scheme.

3. There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.
4. Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.
5. No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage system unless otherwise approved in writing by the Local Planning Authority.
6. Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time and/or phasing of construction.

DRAINAGE NOTES TO APPLICANT

1. Please note that from 7th January 2019, all new developments of more than 1 house, or where a construction area is of 100m² or more, plus if the SAB authority believe that any redevelopment of land has significant surface water drainage implications. This will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's SAB & Highway Development Control Section before construction work begins. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. You will not be allowed to start construction until both permissions have been approved.

If you have not done so already, and your development would not fall into any of the relevant exceptions, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. There is an additional charge of £250 for this service. This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/sab.

2. Prior to commencement of any works hereby approved permanent and temporary works consents under Section 23 of the Land Drainage Act 1991 must be obtained from the Authority. You are therefore advised to contact the Highway Development Control Section at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (Tel.No.01639 686868 e-mail hdc@npt.gov.uk . Please note such consents can take up to 8 weeks to be processed after registration and early application is advised.

Notwithstanding the necessary consent required under section 23 of the Land Drainage Act 1991. The applicant must note that any culverts/ditches/open watercourses that conveys water through their land are to remain free from obstruction at all times. All tributary watercourses (culverted or not) located within the applicants land would be riparian responsibilities whereby the responsibility to sustain the flow of watercourse would remain with the land owner and subsequently passed on to the respective landowners thereafter should the land be sold. For further information on riparian responsibilities please contact Highway Development Control on 01639 686868 or email hdc@npt.gov.uk, alternatively you could access the riparian booklet online using the following web-link <https://www.npt.gov.uk/2867>

SIGNED: 

DATE: 19th January 2023

pp HEAD OF ENGINEERING & TRANSPORT

PAC REF: N422001500 - MYNYDD FFORCH DWM WIND FARM JW

Jack Pugsley

From: Matthew Griffiths <m.griffiths5@npt.gov.uk>
Sent: 04 April 2023 11:08
To: Jack Pugsley
Subject: FW: Mynydd Fforch Dwm - Updated highways response

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Jack,

Confirmation from highways below.

Regards,
Matthew

Matthew Griffiths

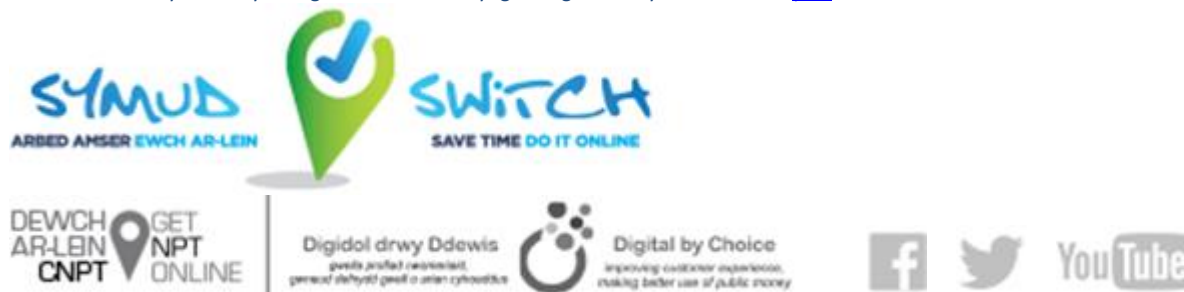
Senior Planner – Uwch Cynllunydd

Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot Tel/Ffôn: 01639 686729

Email / E-bost: m.griffiths5@npt.gov.uk

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni
We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

If you would like to use Welsh when dealing with the Council please click [here](#)
Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)



From: Joanna Weeks <j.weeks@npt.gov.uk>
Sent: 04 April 2023 11:07
To: Matthew Griffiths <m.griffiths5@npt.gov.uk>
Subject: RE: Mynydd Fforch Dwm - Updated highways response

Hi Matthew,

As agreed by Dave Griffiths during the recent meeting. We are happy to condition the trial run as part of the consent. Justin has asked if we can put in a 12 months as the timescale, because of lead-in times for any works on the highway that maybe required.

Jo

Joanna Weeks

SAB & Highway Development –Team Manager (East) / SAB & Datblygu Priffyrdd Arweinydd Tim (Dwyrain)
SAB & Highway Development Control / SAB & Rheoli Datblygu Priffyrdd
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-204707-M9W3
Eich cyf/Your ref: Mynydd Fforch Dwm

Maes Newydd
Llandarcy
Neath Port Talbot
SA10 6JQ

Savills
2 Kingsway
Cardiff
CF10 3FD

ebost/email:
swplanning@cyfoethnaturiolcymru.gov.uk

23 January 2023

Annwyl Syr/Madam / Dear Sir/Madam,

FORMAL REQUEST FOR A PRE-APPLICATION CONSULTATION: DEVELOPMENT OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016 (AS AMENDED)

BWRIAD / PROPOSAL: PROPOSED ONSHORE WIND FARM AND SOLAR ARRAY TOGETHER WITH ASSOCIATED EQUIPMENT, INFRASTRUCTURE AND ANCILLARY WORK

LLEOLIAD / LOCATION: MYNYDD FFORCH DWM WIND FARM, 1KM NORTH-EAST OF TONMAWR, 4KM SOUTH OF RESOLVEN AND 6KM EAST OF NEATH. THE SITE CONSISTS OF MYNYDD FFORCH DWM AND MYNYDD BLAENAVON

Thank you for consulting us on the above, which we received on 5 December 2022.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding fisheries, landscape and ornithology. If this information is not provided, we may object to the planning application when formally consulted by Planning and Environment Decisions Wales (PEDW). Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding European protected Species on any planning permission granted on the decision notice. Without the inclusion of these conditions by PEDW we would be likely to object to the planning permission.

Fisheries

The Pelenna catchment is a 'priority waterbody' and as such it has been the focus for investment to improve overall ecological performance in the context of the water framework directive (WFD). Improvements have been made at a number of locations in the area to promote fish passage and habitat connectivity within the wider catchment. One such location that has been improved for fish passage is the bridge at Fforch Dwm (grid ref. SS 81588 97287). We have improved conditions for fish passage by raising the bed level below and constructing a 'nature like' fishway. We have also fixed timber baulks to

the apron to improve hydraulic conditions for fish wanting to swim past the structure. Replacement of this bridge structure, as proposed by the developer, runs the risk of compromising the benefits currently being derived from recent investments. **We are not opposed for elements of the current bridge to be removed however, it would need to be replaced with a ‘free span’ bridge rather than box culverts and elements of the ‘nature like’ fishway should remain in situ in order to help stabilise the whole river reach.** As this process will be sensitive, we advise close liaison with our fisheries team. Please contact Dave Charlesworth on tel. 0300 065 3215 or e-mail; Dave.Charlesworth@cyfoethnaturiolcymru.gov.uk who can assist further on this matter.

Landscape

Our advice relates to the likely impacts on the Brecon Beacons National Park and Gower Area of Outstanding Natural Beauty (AONB). We agree with the findings of the Environmental Statement (ES) and consider that there would be no significant adverse effects on these designations as a result of this development.

We note that the turbine height range is now 165m to 220m to blade tip. Chapter 7 states that the landscape and visual impacts have been assessed within a 15km radius detailed study area, with cumulative impacts assessed within a 30km radius of the site.

We note that viewpoints in the two Designated Landscapes and special qualities within the Brecon Beacons National Park have been considered within the 30km radius for day and night-time effects. The 30km radius is also referred to as the study area in the ES. The more open location of Comin Y Rhos has been used for viewpoint 13 and has been included as a night-time photomontage.

The ES states that single 2000 candela red lights would be fitted on the nacelles of 4 turbines and 200 candela red lights on the nacelles of 3 turbines. Lights would be dimmed during meteorological visibility of more than 5km. Visibility from the Black Mountain (viewpoint 14) would be in an area less frequented at night, apart from the A4067 north of Brynamman and that there would be glimpses from viewpoint 13.

The ES assesses negligible effects on the dark skies of the Brecon Beacons National Park, with no effects on Dark Sky Discovery Sites. We agree with this assessment however, **we seek clarification of what the lights in the foreground of viewpoint 13 represent, given that there is no development shown in the view in the daylight image from the same viewpoint.**

We note that all notable developments have been included in the cumulative assessment, including the Y Bryn proposed wind farm.

Section 7.4.7 of the ES details extensive visibility from the south facing slopes of the Black Mountain (Y Mynydd Ddu), with more patchy visibility on high ground around Ystradfellte. Reference is made to the National Park's Landscape Character Assessment and LANDMAP (GN046). Landscape Character Areas assessed within the National Park are LCA 2 Y Mynydd Ddu, LCA 3 Fforest Fawr, LCA 4 Waterfall Country and Southern Valleys and LCA 5 Central Beacons. Viewpoints assessed within the National Park are viewpoints

13 and 14 and the effects on the Special Qualities defined in the Management Plan have been assessed.

The ES considers that the proposal would extend the influence of wind farms in views from the Black Mountain (Y Mynydd Ddu), although at some distance, and the effects are considered small/negligible in this area. From viewpoint 13 the proposal would be seen on the distant skyline with and behind other wind farms, with negligible effects.

The effects on Special Qualities are considered moderate/minor adverse for 'sweeping grandeur and outstanding natural beauty' and negligible adverse for other Special Qualities.

From viewpoint 15, Mumbles Head in the Gower AONB, the proposal would be seen in the context of views of the Swansea coastline and industrial development and with existing wind farms on the hillsides beyond. The effects on the Gower AONB are considered negligible in the ES.

The cumulative effects on the Brecon Beacons National Park and Gower AONB are also considered negligible, in the context of other large wind farms in the area.

Ornithology

We have reviewed following documents in relation to ornithology:

- Chapter 10 'Ornithology' of the Environmental Statement (ES) by Naturalis Energy Developments Ltd and associated figures.
- Appendix 10.1 'Ornithology' by Avian Ecology and associated figures.
- Confidential Appendix C10.1 'Ornithology' by Avian Ecology and associated figures.

We agree with the rationale given for the single year of dedicated survey on Mynydd Blaenafon as well as the characterisations of future ornithological baselines. **However, no winter walkover surveys were conducted and no justification as to why these haven't been carried out provided. Can it be confirmed as to why these surveys have not been undertaken.**

We note the later start times to the moorland breeding bird surveys in Year 1 as indicated in Appendix 10 Table 2.5. **There appears to be no assessment on whether this affected the results under "field survey limitations". Can this be clarified.**

Furthermore, table 3.3: 'breeding territories' within the Moorland Breeding Bird survey area has 'x' under the 2021 column with values. Can this value be confirmed.

European Protected Species - Bats

We welcome the preparation of the following documents submitted in support of the above proposed development:

- Figure 1 '*Mynydd Fforch Dwm. Site Location*' by SLR dated November 2022.
- Figure 2 '*Mynydd Fforch Dwm Wind Farm. Typical Turbine Elevation*' by SLR dated December 2022.

- Figure 3 '*Mynydd Fforch Dwm Wind Farm. Indicative Turbine Foundations*' by SLR dated December 2022.
- Figure 6 '*Mynydd Fforch Dwm Wind Farm. Switching Station Plan and Elevations*' by SLR dated December 2022.
- Figure 7 '*Mynydd Fforch Dwm Wind Farm. Indicative Temporary Construction Compound*' by SLR dated December 2022.
- Figure 8 '*Mynydd Fforch Dwm Wind Farm. Indicative Track Details*' by SLR dated December 2022.
- Figure 9 '*Mynydd Fforch Dwm Wind Farm. Indicative Cable Trench Details*' by SLR dated December 2022.
- Figure 2/4.1 '*Mynydd Fforch Dwm. Proposed Scheme*' by SLR dated November 2022.
- Figure 3/4.2 '*Mynydd Fforch Dwm. Proposed Scheme and Aerial Overview*' by SLR dated November 2022.
- '*Mynydd Fforch Dwm. Environmental Statement, Appendices and Figures*' by Naturalis Energy Developments Ltd.

We also welcome the Phase 1 habitat survey of the site which confirms that the application site comprises mostly open grassland habitats managed as grazing pasture.

We welcome the confirmation that that no trees, buildings or other structures are present on site which may support roosting bats. We also note that the site has been subject to automated static detector surveys in 2019 and 2021, and weather monitoring.

Published survey guidance advises that static detectors should be placed at all proposed turbine locations for schemes of less than 10 wind turbines. Further to the issues with static recording in 2019 and a change to the scheme design that subsequently occurred, we note that the 2021 surveys deployed more static detectors for a longer period to ensure that the minimum 10 survey nights/season were achieved.

Table 2.2 in Appendix 9.3 (Bat Survey Report) confirms that for four of the turbine locations (T2, T4, T6, T7) the nearest detector was sited at least 100m away. We note the constraints to the surveys as set out in ES Appendix 9.3 paragraphs 2.7.1-2.7.6, particularly in respect of siting the statics at the turbine locations. Given the open nature of the site, we are satisfied that the surveyed locations are representative of the habitats at the turbine locations.

Impacts on bat species at high risk of collision with wind turbines

The online Ecobat tool has been used to analyse the bat activity data obtained to categorise the levels of activity recorded at the site. In general, for the whole site across all seasons, we note that the majority bat activity (>80% bat passes) was from common pipistrelle bats, with a further 4% activity by Noctules, and 3% by soprano pipistrelle bats, all species at high risk of collision with wind turbines. The remaining proportion of call registrations appears to be mainly from low-risk species.

We also note that Ecobat has been used to analyse the bat activity data for high-risk species and that the overall risk assessment is low. However, with reference to Tables 5.1

and 5.2 of Appendix 9.3 we observe that on occasion, at some locations, activity levels peak a little higher. For example, common pipistrelle – August (moderate) and Noctules – MS7, MS8, MS9 (T1-T3) (Moderate).

We recommend that the site is subject to post-construction bat activity monitoring from the outset of the operational phase to assess any changes (particularly increases) in bat activity by medium or high-risk species over prolonged periods such that the level of risk posed to these species increases above the currently assessed low risk, and therefore to indicate whether turbine curtailment may be needed.

We concur that curtailment is not needed from the outset of the operation of the wind farm however, it must remain an option for the duration of the 35-year planned operational phase if use of the landscape by bats changes sufficiently to increase the risk posed by the wind farm to bats at medium or high risk of collision with wind turbines.

With reference to ES paragraph 9.5.6 and Table 9.7, we welcome the confirmation that each of the turbines will be sited to achieve the advised minimum 50m buffer from the nearest bat habitat features.

We also note the proposals to feather all turbine blades whilst idling, although we note that the specifics of timing and applicable wind speeds are not stated. Feathering turbine blades is an easy way to reduce impacts on bats without compromising energy generation. This should include the specifics of when idling will apply.

We consider that both of the above aspects could be managed through the use of appropriately worded conditions attached to any permission granted for the application by PEDW.

Proposed Mitigation

Condition - Turbine siting

Determination of the final position of the turbines utilising the micro-siting allowances must ensure that turbines continue to be sited to accord with the joint agency guidance '*Bats and Onshore Wind Turbines – Survey Assessment and Mitigation*', specifically paragraph 7.1.2 thereof.

Condition - Feathering turbine blades

The turbine blades on all turbines shall at all times be feathered to reduce rotation speeds to below 2 rpm while idling, in accordance with paragraph 7.1.3(a) of the joint agency guidance '*Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation*' (Nature Scot et al, August 2021).

We also request the following conditions relating to European protected species are attached to any consent that PEDW is minded to grant for the scheme.

Condition - Post-construction Bat Monitoring

No development shall commence until a detailed scheme for the post-construction monitoring of bats at all turbines has been submitted to and approved in writing by PEDW, in consultation with Natural Resources Wales (NRW). The scheme shall accord with the joint agency guidance 'Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation' (Nature Scot et al, August 2021). It shall include:

- i. Methods for data gathering and analysis.
- ii. Location of monitoring.
- iii. Timing and duration of monitoring.
- iv. Appropriate persons and equipment to carry out monitoring.
- v. Timing and format for presenting and dissemination of monitoring results including submission to all data relevant databases.
- vi. Remedial measures to reduce any impacts identified through monitoring including in respect of turbine curtailment.
- vii. Contingency prescriptions that will be carried out in the event of failure to undertake required surveillance; and
- viii. Other information which PEDW deem necessary.

The scheme shall be implemented in accordance with the approved details upon commencement of operation of one or more of the turbines.

Condition - Turbine curtailment

In the event that post-construction monitoring under the previous condition identifies anything other than a low risk to bat species at medium or high risk of collision with wind turbines using the Ecobat methodology, a turbine curtailment protocol shall be submitted to and approved in writing by PEDW, in consultation with NRW by 31 December in the year that monitoring takes place. The protocol shall be informed by the joint agency guidance 'Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation' (Nature Scot et al, August 2021). It shall provide for the operation of any turbine to cease immediately in circumstances prescribed by the protocol and in any event whenever the monitoring carried out pursuant to the post-construction monitoring condition shows activity levels at any turbine to be moderate or above for bat species at medium or high risk of collision with wind turbines, using the Ecobat methodology. The provisions of the curtailment plan shall include prescriptions that evidence implementation of the curtailment plan. When operation is re-commenced it shall accord with the approved turbine curtailment programme.

The protocol shall provide for turbine curtailment programmes to include provision for on-going monitoring of the effects of the programme on bat injuries, fatalities and activity at the site, and shall provide for the preparation of an adjusted curtailment programme where monitoring shows that the impact on bats is unacceptable in the reasonable opinion of PEDW, with operation ceasing immediately until the adjusted curtailment programme has been submitted to and approved in writing by PEDW, in consultation with NRW. Upon recommencement of operation of the turbine operation shall comply with the adjusted curtailment programme as approved.

European Protected Species: Legislation and Policy

Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017. Where bats are present and a development

proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by NRW, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.
- ii. There is no satisfactory alternative; and
- iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN5) states that your Authority should not grant planning permission without having satisfied itself that the proposed development either would not impact adversely on any European Protected Species on the site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied.

Peat

We note from the information provided that deposits of varying depths are widespread in this area. Whilst reviewing Chapter 4.1 of the ES 'wind turbine locations' in conjunction with the Peatland Management Plan, turbines 1 and 4 will impact on deep peat and the track of turbine 3 will impact on shallow peats contiguous with deeper peat. As highlighted in our scoping response to PEDW, dated 20 May 2022, the Local Planning Authority will lead on matters in relation to peat and they may wish to discuss the locations of these turbines and the track with the developer.

We would wish to advise the Local Planning Authority when considering this matter that the Peatland Management Plan states that thin peat was classified as 0.5-1.5m deep, this is in fact deep peat. Thin or shallow peat would be 0.1-0.49m peat.

Groundwater

We have reviewed the following documents which have been submitted in support of the proposed application.

- Chapter 11 of the ES by Naturalis Energy Developments Ltd.
- Technical Appendix 3.1: 'Outline Construction Environmental Management Plan Mynydd Fforch Dwm Windfarm' prepared for Naturalis Energy Developments Ltd.

We note Chapter 11 was initially a desk-based study, but this was validated on a site investigation. Section 11.4.30 states "Based on historical mining works locally and given that groundwater springs in the vicinity of the site are captured and conveyed into Coal Authorities Mine Water Treatment Plants adjacent to the site, we would expect that groundwater is in poor condition". The distinction between natural ground water spring and mine water discharges needs to be noted. We recommend that the Coal Authority, who manage the mine water treatment schemes for the most polluting discharges be contacted to ensure they are aware of the proposed development.

We note that all of our previous points raised in our scoping opinion response to PEDW relating to potential pollution of controlled waters have been addressed in the documents provided.

Pollution Prevention

We note section 4.6.4 of the design and access statement states that non-significant effects will be further reduced via the adoption of management measures in the form of a Construction Environmental Management Plan (CEMP). An outline of the CEMP has been included as Technical Appendix 4.1 and we note its content. We will provide comments on the report when submitted with the planning application.

Flood Risk

We have reviewed the 'Flood Consequence Assessment' (FCA) by SLR (Doc Ref. 410.10909.00002). The works do not appear to impact the fluvial floodplain and the turbines will be located within DAM Zone A of the development advice maps (DAM) in accordance with TAN15. We therefore have no further comments regarding this matter.

Bridge Replacement

The proposed replacement bridge will be over the Nant Blaen Pelenna, an ordinary watercourse, and therefore any separate Ordinary Watercourse Consent required will be considered by the Lead Local Flood Authority.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Ashley Bosomworth

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

MsSara Dryhurst-Roberts
Savills
2 Kingsway,
Cardiff
Cardiff
CF10 3FD

Date: 23/01/2023
Our Ref: PPA0007426

Dear Ms Dryhurst-Roberts

Grid Ref: 281598 197434

Site Address: Mynydd Fforch Dwm Wind Farm Neath

Development: DNS - Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works.

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

I refer to your consultation documents received in accordance with Article 9(3) of the Development of National Significance (Procedure) (Wales) Order 2016, which precedes your application for a Development of National Significance for the construction of a solar farm together with all associated works, equipment and necessary infrastructure at Mynydd Fforch Dwm, Neath

We welcome the opportunity to comment on the proposal and would offer the following standing advice which should be taken into account within any future application:

SEWERAGE / SEWAGE TREATMENT

It appears the application does not propose to connect to the public sewer, and therefore Dwr Cymru Welsh Water has no further comments. However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be re-consulted on this application.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public

ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

WATER SUPPLY

We acknowledge a water supply for this proposed development will not be required. However, should circumstances change, please contact our Developer Services Team on 0800 917 2652.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.

From: Cuddy, Paul <Paul.Cuddy@wsp.com>
Sent: 08 February 2023 08:54
To: Sara Dryhurst-Roberts
Cc: LGC_Development_Control-South@gov.wales
Subject: Pre-planning consultation, Mynydd Fforch Dwm Wind Farm

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Sara,

Further to your email consultation received 5th December in respect of pre-application feedback for the potential Mynydd Fforch Dwm Wind Farm development, I write to advise that, should the applicant wish to submit a full planning application in support of this development, the Welsh Government would request the submission of the following;

- 1) The applicant is required to identify and provide full details of all accommodation works required on the trunk road network in order to facilitate the transportation of all development components to the site. This shall include, but is not limited to:
 - a) Full Design Manual for Roads and Bridges (DMRB)-compliant engineering details where alterations to the trunk road network are required;
 - b) Visibility splay and Stopping Sight Distance (SSD) information relating to the proposed site access in accordance with the requirements of both CD 109 and CD 123 of the DMRB;
 - c) The identification of any departures from standards where compliance cannot be achieved and the production of departure submissions for review by the Welsh Government's Departures Review Panel.
- 2) The applicant is advised that they will be required to enter into a S278 agreement under the Highways Act with the Welsh Ministers prior to the construction of any accommodation works required on the trunk road network.
- 3) The applicant will be required to submit a Transport Assessment;
- 4) The applicant is required to submit a Construction Traffic Management Plan that shall be to the satisfaction of both the Local Authority and the Welsh Government and which shall contain details of all required Abnormal Indivisible Load (AIL) movements along the trunk road network;
- 5) The applicant is advised that the Welsh Government wish to be consulted regarding environmental impacts on the Strategic Road Network and associated soft estate during design development and the Environmental Statement. As such, the applicant is required to provide evidence confirming that;
 - a) potential pathways to environmental contamination of the SRN, including the soft estate and water drainage system, are anticipated and controlled appropriately;
 - b) the loss of semi natural habitats of value to biodiversity on the SRN soft estate is avoided where possible and mitigated and compensated for where impacts cannot be avoided;
 - c) opportunities to provide biodiversity enhancements within and adjacent to the SRN soft estate should be perused such that there is a net benefit for biodiversity resulting from any works related to the SRN, in accordance with the Section 6 Enhanced Biodiversity Duty under the Environment (Wales) Act 2016.'

Regards, on behalf of Welsh Government Transport Division

Paul Cuddy BSc (Hons) MCIHT
Senior Highway Engineer - Highways North



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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix B.2 Non-Specialist responses



Defence Infrastructure Organisation

Kaye Noble
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference:

Tel: 07815487744

Our Reference: **DIO 10057434**

Email: Kaye.noble106@mod.gov.uk

Sara Dryhurst-Roberts
Savills
2 Kingsway
Cardiff
CF10 3FD

09 February 2023

By email only

Dear Sara,

Application reference:

Site Name: **Mynydd Fforch Dwn**

Proposal: **Proposed onshore wind farm and solar array together with associated equipment, infrastructure and ancillary works**

Site address: **Mynydd Fforch Dwn**

Thank you for consulting the Ministry of Defence (MOD) in relation to the planning application through your communication dated 5th December 2022.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to tell you that, **subject to the conditions detailed in Appendix A**, the MOD has no objection to the proposed development.

The application concerns a development of 7 turbines with maximum blade tip heights of 220.00 metres above ground level and the installation of a Solar Array. The development has been assessed using the location data (Grid References) below.

Turbine no.	Easting	Northing
1	281131	197711
2	280820	197190
3	280629	197599
4	283088	197744
5	282522	197493
6	282628	198074

7	282036	197830
Solar	280821	197035

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.

Physical Obstruction

In this case the development falls within Low Flying Area 7 (LFA 7), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

As a minimum the MOD would require that the development be fitted with MOD accredited aviation safety lighting in accordance with the Air Navigation Order 2016.

Summary

Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's letter dated 5th December 2022 and the documents titled 'Design and Access Statement' dated November 2022, 'Proposed Scheme' dated November 2022 and 'Typical Turbine Elevations Fig 1 and 2' dated December 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely,

K Noble

Kaye Noble
Assistant Safeguarding Manager
DIO Safeguarding

(Appendix A enc)

Appendix A

Condition - Aviation Lighting

Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Ryedale District Council in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

- a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
- b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason for condition.

To maintain aviation safety.

Condition - Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of wind turbine generators;
- b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
- c) the date any wind turbine generators are brought into use;
- d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.

To maintain aviation safety.

Jack Pugsley

From: Rob Dunning <Rob@ggat.org.uk>
Sent: 12 December 2022 10:22
To: Sara Dryhurst-Roberts
Subject: RE: Pre Application Consultation - Mynydd Fforch Dwm

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Dear Sara,

Many thanks for the consultation. We have reviewed the information on the regional Historic Environment Record (HER) and note the submission of an Historic Environment Desk-based Assessment (SLR ref. 410.V10909.00002, dated November 2022), as well as an Environmental Statement which contains an Archaeology and Cultural Heritage Chapter (Chapter 12). As the assessments indicate, the proposal is located in an area of archaeological potential.

The development area includes the Cwm Pelenna Colliery Ventilation Furnace, a Scheduled Monument (Cadw ref. GM458). The assessment recommends that a 'floating road' is used to avoid any potential impact. This may well be appropriate, but as the Furnace is Scheduled, **Cadw** should be consulted over the proposal, as well as any requirement for Scheduled Monument Consent.

There is also a medieval platform (non-designated) which the current proposed plans indicate will be crossed by an access track. As the assessment indicates, the track should be re-routed to avoid any direct impact and thus preserve the monument *in-situ*.

There is also the potential for currently unknown archaeological sites to be present in the development area. Particularly those dating to the prehistoric, medieval and Post-medieval periods. As such the assessment recommends an initial geophysical survey in order to identify such sites. Such an approach is appropriate and should be carried out in accordance with an agreed Written Scheme of Investigation (WSI). It should be noted that such a survey is the first phase of archaeological investigation and it is likely that additional evaluation work will be required.

It is our policy to recommend that all archaeological work is carried out by either a Registered Organisation (RO) with the Chartered Institute for Archaeologists (CIfA), or by a full Member (MCIfA) of CIfA.

Should you require anything further, please get in touch.

Regards,

Rob

Rob Dunning BSc MCIfA
Archaeological Planning Officer
Glamorgan-Gwent Archaeological Trust Ltd
SA12 Business Centre
Seaway Parade
Baglan Energy Park
Port Talbot
SA12 7BR

e-mail rob@ggat.org.uk
web www.ggat.org.uk

Jack Pugsley

From: James.Cooke@gov.wales
Sent: 27 January 2023 17:34
To: Jack Pugsley
Cc: Arwel.Williams@gov.wales; Tim Mockridge
Subject: RE: Mynydd Fforch Dwm - public consultation

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Hi Jack,

Apologies for the delay in getting back to you. We're exceptionally busy and it took a little longer than expected to go through the documents.

From the WG peatland / soil point of view, there are a few gaps and issues / inconsistencies with the documents. Our initial view is that if it came before us in a formal consultation, we would probably issue an objection.

In terms of the FW policy context, we will point the Inspector to the both planning policy and wider peatland / natural resource policy.

The Department has examined the Consultation Documents^[1] and consider the policies and guidance below are also applicable to this development: -

- Policy 9 of the National Development Framework (NDF) – Future Wales highlights soil carbon, biodiversity hotspots / networks, natural flood management and upland habitats as national natural resources. These national natural resources exist as a direct result of the presence of peat soils.
- Policy 17 of NDF Future Wales - states '*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*'.
- Policy 18(10) of NDF Future Wales – notes the requirement for '*acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration*'.
- Paragraph 6.4.3 (bullet 4) of Planning Policy Wales
- Natural Resources Policy

Peat soils are extremely fragile. Peatland habitats cover 3-4% of Wales yet store in the region of 20-25% of all Welsh soil carbon. Development and loss of peatland is contrary to the objectives of the National Peatland Action Programme (NPAP). The Net Zero Plan for Wales (Policy 72) requires the restoration of approximately 45,000ha of peatland by 2050 – therefore any losses to the peatland resource would undermine this objective. The priority now given to peatlands reflects their significance in addressing the Nature and Climate Change Emergencies in Wales.

The Welsh Government's long term Peatland Policy (Welsh Government Ministers Decision - June 2019) is:

- i) ensure "*all peatlands with semi-natural vegetation are subject to favourable management/restoration,*" **and**

- ii) restoring “a minimum of 25% of the most modified areas of peatland”.

The Welsh Government Biodiversity Deep Dive^[2] recently tripled the restoration target of peatland with a view towards the Net Zero 2050 target of 45,000 ha of peatland restored.

Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services to Wales. These services include food, fibre, water and important contributions to climate regulation, biodiversity and protection from natural disasters. The Natural Resources Policy (NRP) requires that we sustainably manage our soil resource, to build resilience and maintain the soils functions and ecosystem services our soils provide.

In terms of identifying peat we employ the Soil Survey of England and Wales definition which is confirmed in the National Peatland Action Programme document:

This includes any transitioning shallow peaty soils integral to the hydrological functioning of peat bodies: -

Peat soils are defined by the Soil Survey of England & Wales as:

- *more than 40 cm of organic (O horizon) material within the upper 80cm, excluding fresh litter (L) and living moss; or*
- *more than 30 cm of organic (O horizon) material resting directly on the bedrock (R or Cr) or extremely stony material; and,*
- *no overlying non-humose material mineral horizon that has a colour value of 4 or more and extends below 30cm depth.*

There is inconsistency over the use of this definition and the arbitrary 50cm threshold. This makes it difficult to assess the volumes, risks, and impacts through Peat Management Plan. In addition, Section 1.1 of the PMP states, *Areas of the site where soils are less than 0.5m thick are considered to be too thin to be classified as peat and are therefore classified as soils.*

There is concern over the calculation of peat volumes, micrositng allowance (50m and 100m depending on the infrastructure), the use of 50cm as an assessment threshold, application of aspects of the SEPA Guidance note, the storage and re-use of peat and potential impacts on mineral, organo-mineral and shallow peat soils. In addition the PMP does not appear to have been updated since our recent discussion and does not appear consistent with ES chapter 4 – Scheme description and alternatives.

To assess potential impacts and inform decisions on infrastructure siting, location and extent of mineral, organo-mineral and shallow peat (where not integral to the functioning of a peat body) soils on site and their physical characteristics would be beneficial for areas of any proposed infrastructure siting. This would provide information to inform a Soil Management Plan (SMP) and inform the decommissioning plan, restoration, and aftercare of the site.

The SMP should include: -

- Soil stripping programme - volumes and types of soils affected;
- Soil handling techniques and procedure, timing;
- Size, location, construction, management and period of soil storage dumps;

- Proposed decommissioning, after use and restoration programme, including techniques and aftercare programme.

The proposals for the re-use of peat on site to reinstate track shoulders, crane hardstanding and turbine bases (Section 3.1 of PMP) also raises concerns. Peat is extremely fragile and excavated peat appears to be at high risk of degradation and would therefore be considered a loss. In addition, the principles in the Peat Management Plan under section 4.5 appear to be generic and do not reflect the specifics of the proposal. The restoration proposals under section 4.6 are also generic do not consider good soil handling principles or appear to relate to Table 5-1 “re use requirements”. There is also concern over the treatment of peat as a waste in Table 6-1 of the PMP and how this risk also relates to the micro-siting allowance. I’m not clear how the hydrological function of the peat is maintained, the relationship between hydrology and the PMP, and overall drainage scheme.

I’m concerned the Peat Management Plan often references SEPA – it raises a question over how much of the plan is bespoke to the development or taken from another project. See Table 6-1 as an example, reuse bottom right, *“If peat does not require treatment prior to re-use it could be used on-site providing adequate justification and method statements are provided and approved by SEPA”*.

At the heart of our concern is meeting Policy 18(10) of NDF Future Wales. The proposals at present would not give us confidence effective restoration would be achieved and therefore the peat resource underpinning national natural resources in Policy 9 of FW would be compromised.

All the best,

James

From: Jack Pugsley <jack.pugsley@savills.com>
Sent: Tuesday, January 10, 2023 4:21 PM
To: Cooke, James (CCRA - ERA - Landscapes, Nature and Forestry) <James.Cooke@gov.wales>
Cc: Williams, Arwel (CCRA - ERA - Landscapes, Nature and Forestry) <Arwel.Williams@gov.wales>; Tim Mockridge <timmockridge@regpower.co.uk>
Subject: RE: Mynydd Fforch Dwm - public consultation

Hi James

I hope that you had a nice Christmas and new year

Following on from our discussion before Christmas and my email below, it would be useful to understand what capacity you and your team might have to review our project prior to formal submission to PEDW in late February/early March.

Furthermore, it would be great if we could look to agree a Statement of Common Ground with yourself in due course – both to aid us and the appointed Inspector.

Thanks, Jack

Jack Pugsley
Associate Director
Planning

Savills, 2 Kingsway, Cardiff, CF10 3FD

Jack Pugsley

From: Megan Price <m.price4@npt.gov.uk>
Sent: 07 February 2023 07:04
To: Jack Pugsley
Cc: Tim Mockridge
Subject: RE: Mynydd Fforch Dwm

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Hi Jack,

Our main concerns with the application at the moment are (nothing major and we discussed the ways around it in the two meetings we had)

-Peat management Plan

- lots of areas still require more detailed GI to fully characterise the peat
- Floating tracks, but we addressed that in the last meeting with Joey and Mike
- All the peat you remove is down as being used to reinstate verges, no restoration. Again we addressed this in the last meeting so some changes to how the plan is written should solve that
- Excavated materials calculator – More is being used on site than excavated

-Draft HMP

- Tyle'r Waun (you have it spelt wrong throughout the document)
- I had concerns about you carrying out the habitat restoration to provide the best benefits with what you can do, but we talked it over with Joey and Mike and I think they have given you some really useful information about where to go and they can continue to feed in on that
 - monitoring of restoration should be carried out in yrs 1,2,3,5,10,15 & 25 to tie in with PYC and provide the best continuity between the sites (comparing data etc)
 - Water vole surveys will be needed on Tyle'r Waun prior to works commencing as there are water voles recorded in the area, habitat on the SINC isn't the best but it needs to be done just to make sure as they are a protected species
 - All the management is on the SINC's, nothing on the windfarm however we discussed that and you will be able to provide the best benefits on the SINC's – if we could increase the area though that would be great (esp over the MB side, but I understand the difficulties – further justification in the document as to why this is the case will just make sure that you have a robust reasoning) Mike did mention several ideas like the Molinia cross tracking and sphagnum planting, but if you can justify a robust reasoning as to why it all has to be concentrated on the MFD side then that's understandable and you have to work within the constraints of both sites.
 - we are not happy with all the tree planting on MB as they are on deep peat, if there is any way you can help remove that as part of this restoration (I understand your position we just need to keep bringing it up as it is a big issue)

All monitoring proposed needs to use the yrs 1,2,3,5,10,15 & 25, we will be conditioning those years as we have used them on other windfarms and it gives consistency to the records

Bats – the feathering/curtailing as suggested is appropriate (to tie in with the steps PYC are taking and as they are the adj windfarm to you, you are likely to face the same issues) and again we need robust monitoring on the birds and bats once operational to ensure we can take appropriate steps if needed

Birds – the planting of all those trees around your turbines on MB is going to change habitat and it will be a developing habitat of a type used by various sp esp nightjars – you have the buffers in place that need to be kept clear of vegetation/suitable habitat but it would be worth raising this and monitor the situation as it changes – the local bird population is likely to vary as this habitat matures and becomes suitable for different species, bringing them in closer to your turbines.

Reptiles – you picked up surprisingly low amounts of reptiles and no adders which is really shocking. However that is what you recorded and the surveys followed the guidelines so that's your results. But I would suggest that you put in place MS to deal with if you do encounter unexpected reptiles (esp adders), how you will be dealing with habitats that you would expect to have high populations – habitat manipulation etc. And what you will do when you encounter features that could be used as hibernacula/breeding sites for reptiles – and again adders as they are loyal to their territories.

Apologies for being late to respond
Kind Regards
Meg

Megan Price

Ecologist (Consultancy & Planning)/ Ecolegydd (Ymgynghoriaeth a Chynllunio)
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot Tel/ Ffôn:
07816973877

Neath Port Talbot Council

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

Cyngor Castell-nedd Port Talbot

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell Nedd SA11 2GG



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From: Jack Pugsley <jack.pugsley@savills.com>
Sent: 06 February 2023 10:01
To: Megan Price <m.price4@npt.gov.uk>
Cc: Tim Mockridge <timmockridge@regpower.co.uk>
Subject: RE: Mynydd Fforch Dwm

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Jack Pugsley

From: Robbie Meacham <r.meacham@southwales-tra.gov.uk>
Sent: 02 February 2023 15:33
To: Jack Pugsley
Cc: enquiries; Abnormal Loads
Subject: RE: E2300633 Abnormal loads

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Dear Jack,

Thank you for sending the link to the relevant documents, which I have briefly reviewed.

It appears that dimensions are included for the components only, but not actual anticipated abnormal load vehicles that will carry these components (apologies if I've missed it due to document size). It is this information that we need to be able to screen properly (effectively draft abnormal load notifications). Having said that, based on the component details given, I suspect that the trunk road section of the route (M4 and A465) should be suitable as things stand.

We do however have major engineering works planned for the A465 between Llandarcy and Neath over the coming years, which may limit the capacity of the bridges for periods of time. I'm not in a position to give definitive dates at this point unfortunately.

I appreciate that the above information is quite vague, but without details of the anticipated abnormal load vehicles, and the likely movement dates, it is difficult for us to provide more definitive feedback. If more information is available please submit to abnormalloads@southwales-tra.gov.uk.

Regards

Robbie Meacham
BEng (Hons) CEng MICE
Structures Manager
Rheolwr Strwythurau

Tel: 01792 325973
Mob: 07970 131665

South Wales Trunk Road Agent
Asiant Cefnffyrdd De Cymru

Unit 12, Llandarcy House
The Courtyard, Llandarcy.
Neath. SA10 6EJ

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From: Jack Pugsley <jack.pugsley@savills.com>
Sent: 02 February 2023 14:28
To: enquiries <enquiries@southwales-tra.gov.uk>
Subject: RE: E2300633 Abnormal loads

Good afternoon

Thanks for coming back to me on this point and I appreciate you reviewing our proposals. For the sake of our respective inboxes (as the files are relatively large) please use the hyperlink below to access the document noted. As I noted previously, we would typically contact you once we have consent but feel that there is value in advancing this stage of works.

<https://mfdwindfarm.co.uk/consultation-library/>

Environmental statement appendices

ES Appendix 13.1 Transport assessment (including Transport Management Plan and route survey)

ES Appendix 13.2 AIL route survey

Please let me know if you have any questions.

Thanks, Jack

Jack Pugsley
Associate Director
Planning

Savills, 2 Kingsway, Cardiff, CF10 3FD

Tel : +44 (0) 2920 368 947

Mobile : +44 (0) 7814 958 358

Email : jack.pugsley@savills.com

Website : www.savills.co.uk



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From: enquiries <enquiries@southwales-tra.gov.uk>

Sent: 01 February 2023 06:36

To: Jack Pugsley <jack.pugsley@savills.com>

Subject: E2300633 Abnormal loads

EXTERNAL EMAIL: Be cautious when opening attachments or clicking links

Dear Mr Pugsley,

Thank you for your email regarding likely abnormal load movements on our network.

We'd happily review and comment on your proposals at this stage, but for our review to be meaningful the information supplied will need to include the following;

- Trunk Road route to site
- Anticipated travelling vehicle dimensions (Height, Width, Weight, and length)

We appreciate that the vehicle details are unlikely to be confirmed at this early stage, but best estimates will allow us to provide guidance.

Regards

South Wales Trunk Road Agent

Asiant Cefnffyrdd De Cymru

Unit 12, Llandarcy House

The Courtyard,

Llandarcy, Neath. SA10 6EJ

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

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To process your enquiry we may share your data securely with the Welsh Government and/or other relevant third parties in accordance with data sharing agreements. [Further information is available here](#).

In the event of any queries regarding use of your personal data, or should you wish to withdraw your consent to the use of this information you may notify SWTRA by contacting the Data Protection Officer:

telephone 0300 1231213

email enquiries@southwales-tra.gov.uk

postal address: SWTRA, Unit 12, Llandarcy House, The Courtyard, Llandarcy, Neath, SA10 6EJ.

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From: Jack Pugsley <jack.pugsley@savills.com>

Sent: 30 January 2023 16:55

To: enquiries <enquiries@southwales-tra.gov.uk>

Subject: Abnormal loads

Good afternoon

I was hoping that you might be able to help me please? I'm about to submit a planning application, the construction of which (if approved) will require abnormal loads being transported from Swansea Docks to the Site. We have prepared a Transport Management Plan as part of our application.

Typically, detailed matters such as obtaining comment from yourself and other interested parties is delayed until we have permission to build the Site. However, we were wondering if you would comment at this stage?

The above is based on an assumption that you are the correct party for me to contact. Happy to be corrected – might be easier to discuss over the phone.

Thanks, Jack

Jack Pugsley
Associate Director
Planning

Savills, 2 Kingsway, Cardiff, CF10 3FD

 Tel : +44 (0) 2920 368 947

Mobile : +44 (0) 7814 958 358

Email : jack.pugsley@savills.com

Website : www.savills.co.uk



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Jack Pugsley

From: Alex Forster <Alex.Forster@wwutilities.co.uk> on behalf of Dig (Shared Mailbox) <Dig2@wwutilities.co.uk>
Sent: 07 December 2022 11:40
To: Sara Dryhurst-Roberts
Subject: FW: Pre Application Consultation - Mynydd Fforch Dwm
Attachments: Letter.pdf; Notice 8 and 9(2).pdf

Follow Up Flag: Follow up
Flag Status: Completed

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Good Morning,

Based on the information given and the address provided, Wales & West Utilities have no apparatus in the area of your enquiry.

Our records show those pipes owned by Wales & West Utilities (WWU) in its role as a Licensed Gas Transporter (GT). Service pipes, valves, syphons, stub connections, etc. may not be shown but their presence should be anticipated. No warranties are therefore given in respect of it. They also provide indications of gas pipes owned by other GTs, or otherwise privately owned, which may be present in this area. This information is not information of WWU and WWU is unable to verify this information or to confirm whether it is accurate or complete.

Please let me know if you require any further assistance.

Kind Regards,

Alex Forster

Plant Protection Team, Administrative Assistant

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Please note, that from Monday 11th July, our cost for the provision of mapping data through LSBUD will increase to £47 +

Mynydd Fforch Dwm Wind Farm and Solar Array

Pre-Application Consultation Report



Appendix B.3 Community responses

Cllr.J.J.Hurley
42 Johns Terrace,
Tonmawr,
Port Talbot
SA12 9UR
22/1/23

Your Ref; P2022/1037 Mynydd Fforch Dwm Wind Farm

Dear Sirs, please see below my observations and concerns passed on by residents in relation to the above development.

Transportation impact during construction;

Residents from both the Local and wider area on the designated routes have stated that we have high levels of existing traffic on Cimla/Afan Valley Road, and considerable existing delays in morning and evening traffic. The numbers of HGV and general traffic associated with the development will add impact to these delays. This impact will be more greatly felt on the roads local to the site, Tonmawr Rd, through Danycoed, Railway Terrace and onto Fforchdwm Rd. The surveys taken by the developer are also errored in that high numbers of existing HGV movements are recorded on these local roads, but, these numbers are disagreed with by local residents. This is in turn, due to this error, show a lesser impact by the huge increase of traffic associated with the development. There are also concerns of safety through the village roads, especially through the narrow access at Railway Terrace which will see HGVs passing within 600mm of the front of the properties situated there whose front access doors open directly onto this road. The residents here are also concerned to the potential damage and disturbance to the structures of their properties, the cottages are over 130 years old with shallow, unsubstantial foundations. There are also concerns in the increased traffic causing damage to highways/culverts, drains, some of which we have had previous issues with.

There is the additional concern of some of the existing road layouts, in particular, the junction at Eastland Rd and Cimla Rd, being currently unsuitable with modifications needed, these modifications currently not in future plans at the moment.

Transportation of Turbines, Blades, Towers;

Residents have concerns over impact to traffic and access in and out of the village and wider area during this process. There are concerns on disruptions to services and utilities, which may have to be temporarily taken down to allow movement of the oversize items. The residents at Railway Terrace also have specific worries due to the close proximity these items will be passing their properties, again, due to safety, property damage etc.

Ecology & Biodiversity;

There will be an impact during construction and also when the development is completed. Although impact surveys have been carried out, local walkers/ornithologists etc feel that not all species and, areas affected by the development have been properly covered. The developer has mitigated that correct procedures have been followed in relation to surveys needed and, will be following the appropriate guidelines during construction but residents still feel all has not been addressed. There are also concerns over Peat loss/disturbance and, it has been stated that although Welsh Government policy supports Renewable energy, there is, in contradiction, Welsh Government policy that promotes the protection of Peat deposits and biodiversity/ecology.

Turbine Locations and Infrastructure.

Although all turbines will be obviously visible, the greatest impact on locals are the turbines situated on Mynydd Blaenavon. These are directly above, and in close proximity to Johns and Blaenavon Terrace. Residents have concerns over Noise, Shadow Flicker, possible issues with radio/tv/mobile reception and the obvious visual impact. There are also concerns for increase in water run off from the sites due to the loss of water absorption by replacing permeable ground with roads, construction areas and the huge turbine bases. Residents are also aware that, due to climate change, rainfall is showing increase on every year thus the potential of increased issues moving forward. The turbines will be some of the highest installed onshore and will dramatically alter the scenic backdrop of Tonmawr.

Community Benefit;

The developers have given details and options to residents in relation to financial and other benefits, but, residents have stated that the local areas already have Community benefit from the existing Pen Y Cymoedd trust fund, currently at £1.5 million pounds a year. Residents feel that they do not take full advantage of this fund so there is scope to improve this and access this available funding as opposed to the need for more funding as a payment for the associated development impacts. The local community will also receive benefit from Y Bryn Windfarm if this is a successful development.

Balance of Renewables/ Impacts/Wellbeing

In relation to the overall balance, most residents agree that there is a need for renewables in the addressing of climate change but that there must be a balance of any development between the local impact, during construction on environment and wellbeing of residents, and, also, when the site is operational, the ongoing and future wellbeing of residents local to the development. Residents have mentioned that their, localised impacts, are not receiving balanced consideration against the overall wider benefits to the developer/Welsh Government policies/Climate Change targets.

Summary;

Although understanding the need in regards addressing climate change through renewables, the local feeling is that the overall impact during, construction, and, the long term impact on Wellbeing of residents immediately local to the development outweighs this regard for the wider benefit.

Yours Sincerely

Jeremy Hurley.

I would like to submit my views to the consultation for seven turbines to be built on Mynydd Fforch DWM and Mynydd Blaenavon above the village of Tonmawr.

The residents have a number of concerns of which will be highlighted.

The height of the turbines which will be approx 200 meters high, they will be the tallest wind turbines on land in the UK. As a result we will not know the noise levels and how much flicker this will cause. The height on these turbines will tower over most of the valley and will be an eyesore to the area. We fear that the prices on properties will decrease and will deter anyone from moving into the village.

The height of the proposed turbines will result in extensive and deep foundations to support these, much of the land is peat bog which is protected and a lost peat lands of South Wales project is being funded by the National Lottery to protect peat bog on the mountains of Neath Port Talbot.

Disturbing these sites will potentially release carbon back into the atmosphere.

We will have a total distribution of wild habitat including Adders, Newts, Buzzards, Red Kites, summer nesting birds, flowers including orchids, Blue Bells, some of which are protect species. These are just a few of the species to be found in the village.

Disturbing the peat and soil could have a major effect on the water table and could potentially Cause a flood risk to their homes, with a possibility of home insurance rising to cover this possibility.

One of the major concerns is how they intend to transport these turbines at present there is only one vehicle in the country that can actually transport the blades as they have to be elevated at some points, this being the case at this present time, they would have to just transport the blades over 21 days approximately, the disruption would be catastrophic for the area from the time it hits Neath. Most of the highways in the Neath area have mine shafts running under them and we have had major problems with sink holes appearing, a number of the roads have subsidence occurring and is under observation(our fire engines cannot turn right onto Eastland Rd coming from Cimla unless they are on an emergency) but we are looking to allow all these abnormal loads to travel along Eastland Rd. The route up Cimla and into Tonmawr is not the best of highways with subsidence small bridges low overhead cables road furniture such as benches, but boxes all of which will have to be removed or strengthened to accommodate these heavy loads with more disruption to residents, safety would be an issue in the event of an emergency with only one road leading in, no emergency vehicles would be able to pass these loads.

Railway Terrace is going to be a major obstacle with only 4 inches of clearance to their front doors, residents are expected to remove all hanging baskets and satellite dishes so they can pass, there is also a steep drop on the other side. These are village roads and cannot accommodate such heavy loads and volume of HGV. The highway pass railway terrace leading to Fforch Dwm will have to be widened causing major disruption and destroy more habitat.

To connect the power cables to the national grid, cables will most probably be erected to poles crossing approx 5 miles of mountains causing even more damage to the environment to reach the grid at Briton Ferry.

National Grid have already stated that the grid is already at full capacity presumably due to the amount of wind turbines in the area. Turbines are being switched off because the grid can't take all the power generate, but we are still looking to erect more in the area although more of them will be switched off and not generating power .

I am asking that this project should be stopped from going ahead due to the infrastructure not being suitable to transport these turbines, the disruption to residents over a long period, the bad air quality all these vehicles will generate passing through our villages and the health issues this will cause to children and adults. And the total disregards to our picturesque village with having these put in the centre of out village which you will be able to see from the Bristol Channel to the Penylan in the Brecon Beacons.

Yours Sincerely
Cllr.T.Bowen

PELENNA COMMUNITY COUNCIL

2 BURNHAM DRIVE NEWTON SWANSEA SA3 4TW

24th January 2023.

Mr Tim Mockridge
REG Power Management
Unit 38 Damery Works
Damery Lane
Woodford
Berkeley
Gloucestershire
GL13 9JR

Dear sir

Re: Proposed Mynydd Fforch Dwm Windfarm – Response to the Pre-planning application consultation.

The Community Council engaged with you as a consultee as part of the Pre-planning consultation process, meeting with you and your colleagues on 19 January 2023. Members of Council put forward 72 questions which you received ahead of the meeting. These were sent to you on Monday 16th January and you provided a response to all questions submitted.

The questions submitted by the Community Council covered a range of topics: Transport of construction materials including the towers and turbine blades (15 questions); Issues concerning the site (2 questions); Infrastructure (7 questions); Shadow flicker (2 questions); Pre-application consultation (1 question); Noise (3 questions); Mining activity (10 questions); Insurance/Liability (7 questions); Ground Conditions (7 questions); Flora & Fauna (4 questions); Heritage (2 questions); Energy generation & transmission (3 questions); Other considerations (9 questions). The number of questions placed in each category did not necessarily reflect the overall community concerns.

The Community Council is, of course, in close contact with the residents of the Pelenna Community and these questions which were submitted to you have been generated from the wider community. It appears that by far the majority of local residents are against the proposed development.

The Council had earlier held a public meeting to hear Community concerns, has maintained close contact through social media and face to face contact with the community on these issues, and has listened to the concerns of the Community Action group opposed to this development.

A specific concern for the Community Council is the Children's play area at Johns Terrace, Tonmawr. This is a facility which has been owned by the Council for many years. It is anticipated this play area will be the site of a significant, long overdue and expensive re-development this year. Residents have pushed for this investment for some years, but we now understand that large, heavy construction traffic will travel back and forth on the bank behind and above the play area, putting at risk the play area and the safety of children using the facility. It is certainly not acceptable to the Council that this area will be at risk, and the wider community would also find this situation intolerable.

It is the duty of this Council to protect the environment and the peat bogs which are located at the proposed turbine installation site must not be damaged. It is clear that if this development is allowed to proceed that these plant deposits will be disturbed. What has taken thousands of years to accumulate will be destroyed in an instant. The Community is also concerned that material excavated to allow construction will, apparently, not be removed from site and, of course will pose a danger to residents. This cannot be allowed to happen.

Beside Council's concern over the Peat bogs, we are also concerned that protected species and other wildlife including birds are protected at any cost. Similarly, we must provide protection for the historical features of our community irrespective of the cost incurred.

The villages of Tonmawr and Pontrhydyfen have one access road only. Large vehicles transporting turbines and towers will take a great deal of time to negotiate the narrow road towards the construction site. The journey will be hugely disruptive as it will be necessary to close the road to other traffic including emergency vehicles. This will pose a huge risk for the Community as there may be a potential need for an ambulance, fire tender or even a police vehicle. The Community cannot allow such a risk.

The anticipated abnormally sized loads through the Community will also cause power supply disruption, and may also have an adverse impact on other services. Disruption of this kind is certainly not acceptable.

You have made your best effort to try to allay community fears regarding the building of the windfarm, but you must be aware that local residents do not wish very tall turbine towers to be built close to their properties, and they are also concerned about the immense strain expected to be placed on the local rural road structure. There are clearly concerns over a number of other issues including noise generation, shadow flicker, damage to the local ecosystem, the adverse effect on property values, and other matters reflected in the questions placed with you. This proposed development cannot be allowed to proceed.

For completeness, we attach the schedule of questions raised with you on 19th January, together with your responses.

Yours sincerely

David Mackerras
Clerk to the Council.



Our Ref: AH/SMM

31 January 2023

Dear Sir/Madam

I would like to submit my views to the consultation on the plans for seven turbines to be built on Mynydd Fforch Dwm and Mynydd Blaenavon above the village of Tonmawr.

I have visited the village and spoken to residents and also had a separate meeting with local councillors.

The villagers have a number of concerns - all of which I share.

1. The height of the turbines at the moment is said to be 220 metres which is 660 feet. They will be amongst the tallest turbines placed on land anywhere in the UK. Such turbines until now have been installed at sea. As a result, nobody is aware of what the noise levels there will be from them and similarly what the flicker effect will be. Also, these turbines will tower over all the existing forestry and will totally dominate the skyline and the views around this very beautiful valley. Residents fear that its very presence will lead to a devaluation in local property prices and act as a deterrent to anyone thinking of moving into the area.
2. The Afan and Peleenna valleys also benefit from some tourism mainly connected to mountain biking and the various trails that exist in the area. This development could reduce the number of visitors coming into the area and damage local jobs and tourism businesses.
3. There has recently been a wind turbine collapse on the Pant y Wal windfarm at Gilfach Goch. This turbine was less than half the height of those being proposed and yet during high winds it collapsed. There are very real fears about the safety of these turbines to walkers and other people who happen to be within the vicinity of a turbine in the future. They fear that the excessive height will increase the risk from high winds.

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Welsh
Conservatives

Ceidwadwyr
Cymreig



Senedd Cymru
Welsh Parliament



4. The proposed height of these turbines will result in very extensive and deep foundations needing to be constructed in order to anchor them. Much of the land on these two mountains is peat bog which is a protected habitat and indeed a Lost Peatlands of South Wales project is currently being funded by the National Lottery to protect 23 hectares of bog habitat on the mountains in Neath Port Talbot leading over towards Rhondda – this very area. Residents have grave fears that installing these turbines will destroy the peat habitat needed by so many species of both plants, animals and birds. They also point out that disturbing this peat will potentially release tonnes of carbon into the atmosphere – the very opposite of what windfarms are intended to do.
5. Disturbing the soil and peat on the mountains, which are steep sided, could also result in damage to the water table and the unintended consequence could be an increase in the likelihood of flooding with water cascading down into the valley and potentially creating a flood risk to their homes.
6. One of the major concerns of the villagers is the fact that the roads in the valley will be used to transport the turbines from Swansea docks. 70 such abnormal loads will be generated and there are fears that while these monster loads, which will be 260 feet long, are in transit, the valley will be cut off with no traffic able to move in or out. If an emergency were to take place during this period, a fire engine or ambulance would be unable to get past to deal with it.
7. There are also fears that in Railway Terrace there will be a very small clearance between the sides of the lorries and the front doors of the houses. Villagers tell me that they were told at one of the consultations that the clearance could be as little as four inches which would mean that residents would be trapped in their homes while the lorry was passing. These houses back onto the mountainside and have no rear accesses. People say that they were told they would have to remove hanging baskets and satellite dishes. In my view this illustrates the absurdity of attempting to use narrow valley streets which can barely accommodate cars to transport such huge loads. In my view, the access to the proposed windfarm is inadequate and the scheme should be withdrawn purely on those grounds alone.
8. The access road to the mountains beyond the village will also need to be widened as the lorries travel past and along what was a country lane. Residents say that trees and other valuable habitat will be destroyed in order for the lorries to pass.
9. There is also the issue of over-intensification. There are already 94 wind turbines in situ on surrounding hills and mountains. This is already too many and there are also plans for additional turbines to be erected at the Y Bryn windfarm in nearby Bryn.

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10. In order to link to the National Grid, power cables will have to be erected – probably on poles – across almost five miles of mountainside and forestry in order to reach the connection at Briton Ferry. The environmental harm that this work will entail also needs to be factored into the potential disruption and damage that this development will create.
11. I have been in touch with the National Grid to discuss capacity issues. It is my understanding that the grid is already at full capacity presumably because of the over intensification of windfarms in this area. I am told that existing turbines are being switched off when they should be generating electricity because the grid cannot take their power. That calls into question the whole economic basis of putting any more windfarms into this relatively small area of Wales. I am due to meet National Grid to discuss this issue in depth shortly.
12. People feel that they played their part from Victorian times onwards in supplying the power needed by the nation in the form of the coal that was used to generate electricity. They are dismayed that once again their landscape is being despoiled in order to power the nation and with no economic benefit to them. At least the coal mines provided jobs.
13. Finally, these turbines will be visible from across the Bristol Channel and also as far away as Penylan in the Brecon Beacons. They will be a blot on the landscape for decades but what happens when they reach the end of their lives? Who will pay to remove the rusting hulks that these turbines will become? Will the power companies be asked to set up escrow accounts where money can be set aside to cover the de-commissioning costs as happened with opencast mines?, or will they suddenly go out of business leaving the taxpayer to fund this work.

Yours sincerely

ALTAF HUSSAIN MS
Shadow Minister for Equalities

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Welsh Parliament

Jack Pugsley

From: Cllr. Dean Lewis <cllr.d.lewis1@npt.gov.uk>
Sent: 31 January 2023 16:28
To: hello@mfdwindfarm.co.uk
Subject: New Wind farm

Cllr.D.Lewis
NPTCBC County Borough Member for Resolven & Tonna

Re MFDwindfarm Consultation

Dear Sirs, in regard to the above development that you are proposing, can the following comments be recorded as part of the consultation.

As part of this development will have a visual impact on the Neath Valley side, and, this will be within the area I represent, will there be a financial benefit for the residents affected by this. I know that there are funds/trusts etc associated with all the other local similar developments so am hoping that we are considered in any similar schemes attached to this development.

Also, after looking at the documentation I can also see that there is an impact to traffic on the A465 and also local roads into Neath which has potential for additional issues to the Neath end of my ward and also to the flow of traffic on the dual carriageway, which, again, would impact on residents.

Yours Sincerely

Cllr.D.Lewis

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

If you would like to use Welsh when dealing with the Council please click [here](#)

Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Jack Pugsley

From: Cllr. Carl Jordan <cllr.c.jordan@npt.gov.uk>
Sent: 31 January 2023 13:53
To: hello@mfdwindfarm.co.uk
Subject: Re. Proposed MFD Windfarm Development at Tonmawr

Cllr Carl Jordan
NPTCBC Member for Neath South
Tel No [01639 768841](tel:01639768841)/ 07952419481

Dear Sirs,

Please find below my comments in relation to the above proposed development and would like them to be recorded as part of the current consultation process against the installation.

Transport Hubs and routes being utilised:-

My Ward of Neath South covers a large part of Cimla and stretches down to Neath, and, as the main transportation route for construction and the abnormal loads associated with the development, I and many of my residents/ constituents have concerns in relation to the impact of a huge increase in LGV movements, the delays and works that will result in disturbance during the abnormal load movements and also, the accelerated wear to our highways tarmac surfaces and the utilities infrastructure below, with which we already have recorded/repeated issues/faults being reported without the added traffic expected?

The traffic flow through our main roads at current levels is problematic and this will be seriously impacted by this additional associated traffic.

Visual impact;

I am concerned that although sited in the nearby village of Tonmawr, there will be a visual impact from Neath and the surrounding areas, a concern passed to me by several residents of my ward as the proposed site and turbines will be visible from most of the properties located near the Cefn Saeson school area?

I also have previous and existing connections with Tonmawr, and regularly visit and walk the area where the turbines will be sited and, appreciate the greater visual impact that will be suffered to the residents adjacent to the site, and, the many walkers/mountain bikers who visit Tonmawr to appreciate its scenery and tranquility which will be sadly affected by this Development.

The local businesses have also voiced a concern regards the planning application, many stating they will be unable to guarantee visitors to the area, due to the visual impact these turbines will have on the landscape and outlook.

Yours,
County Cllr Carl Jordan,
Neath South ward.

Sent from [Outlook for iOS](#)

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

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Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)

Pre-Application Consultation: Frequently Asked Questions (Updated 18/01/2023)				
Date Received	Topic	Question	Response	Source of question
2022.12.15	Ecology & Ornithology	What standards have the ecological and ornithological surveys been done to?	The ecological and ornithological assessment has been undertaken with regard to CIEEM guidelines (2018) and informed by consultation with PEDW, NRW, Neath Port Talbot Council and others.	Consultation event on 15th December 2022
2022.12.15	Ecology & Ornithology	What guidance has the applicant considered in respect of bat survey and the assessment of effects?	The ecological assessment, including survey and interpretation, has had regard to a series of documents, including: Good Practice Guidelines, 2nd Edition, Bat Conservation Trust, 2012; Bat Surveys for Professional Ecologists, 3rd edition, Bat Conservation Trust, 2016; Technical Information Note TIN051: Bats and onshore wind turbines, interim guidance, Natural England, 2014; British Bat Calls: a guide to species identification, 2012; General pre-application and scoping advice for onshore wind farms, NatureScot, 2022; and Bats and Onshore Wind Turbines: survey, assessment and mitigation, Nature Scot, 2019.	Consultation event on 15th December 2022
2022.12.15	Ecology & Ornithology	Are there bats on site? If so, what has been done to mitigate impacts on them?	Bats were recorded on and around the Site during the field surveys - which includes 1,372 nights of survey - with the common pipistrelle being the most frequently recorded. In line with Technical Information Note 051, a buffer between the adjacent trees has been designed into the layout of the site to ensure sufficient distance between the trees and the turbines. Furthermore, the speed of the turbines will be 'feathered', where the speed of the turbines is reduced when idling. Appendix 9.3 of the ES sets out the results of the bat survey and an assessment of impacts of the project upon those species present. The assessment identifies a 'low' site risk and a 'medium' size. Applying the overall risk assessment leads to an overall 'low' site risk.	Consultation event on 15th December 2022
2022.12.15	Ecology & Ornithology	What ornithological surveys have been undertaken?	The field surveys undertaken followed the methodologies set out in NatureScot guidance (2017) and the scope of those surveys determined following a review of key data sources. The surveys included but are not limited to: Vantage Point flight activity surveys; moorland breeding birds surveys; breeding annex 1/schedule 1 raptor and owl searches; Nightjar surveys.	Consultation event on 15th December 2022
2022.12.15	Energy	How much energy will the project generate?	Based upon the project we are consulting on, we expect to generate over 100,000MWh	Consultation event on 15th December 2022
2022.12.15	Energy	How much renewable energy is generated in Wales?	In October 2022, the Welsh Government published 'Energy Generation in Wales 2021'. The report states that Wales "generates the equivalent of approximately 55% of Wales' electricity consumption from renewable sources."	Consultation event on 15th December 2022
2022.12.15	General	What are the benefits of the project?	As noted within the Collaborative Benefits Report, the project has several benefits, including reduction in carbon (with a payback period of 16 months - which considers carbon within peat); significant quantum of renewable energy generated; a community benefit fund; local/shared ownership of the project; economic benefits from jobs and training; and biodiversity net benefit.	Consultation event on 15th December 2022
2022.12.15	General	What impact will the project have on house values?	There were various studies on the impact of wind turbines on house prices between 2008 and 2015 in the UK and US and most have struggled to identify significant effects. Since then whilst turbines have undoubtedly got bigger, community benefits have increased significantly, and the impacts of the climate crisis and cost of energy crisis has resulted in a significant increase in support for renewables development which can help tackle both.	Consultation event on 15th December 2022
2022.12.15	General	Does the project benefit from grants?	No - the applicant has not applied for, nor benefitted from grants for this project.	Consultation event on 15th December 2022
2022.12.15	General	Will the project disrupt services and utilities e.g. electric, water, internet, tv?	The project has been designed and includes mitigation to ensure that there is no disruption to services and utilities both during the construction and operation of the project. There may be a need to temporarily lower cables during the construction phase, but this will be done so to minimise disruption. Telecoms and TV is covered in Chapter 6.3	Consultation event on 15th December 2022
2022.12.15	General	How is the project assessed by the Welsh Government?	In Wales at present projects that generate over 10MW of electricity are classified as Developments of National Significance and are determined by the Welsh Ministers and processed by Planning and Environment Decision Wales. The application is assessed on its merits and a recommendation made to the Minister for their determination.	Consultation event on 15th December 2022
2022.12.15	General	What role does Julie James, as the Minister for Climate Change, have in the process?	The Minister for Climate Change will be responsible for determining the project.	Consultation event on 15th December 2022
2022.12.15	General	Has the project considered impacts on well-being and the Well-being of Future Generations Act?	Yes. The project has seven well-being goals and the five ways of working in developing the project. The project will improve the economic, social, environmental and cultural well-being of Wales, as well as being in line with the sustainable development principle. Furthermore, the Minister will have regard to the Well-being of Future Generations Act when making any decision. This is set out in the Planning, Design and Access Statement.	Consultation event on 15th December 2022
2022.12.15	General	What role does Neath Port Talbot have in the DNS application?	Neath Port Talbot are a specialist consultee on the DNS application and provide an important local perspective, including the preparation of a Local Impacts Report for submission to PEDW. Neath Port Talbot do not determine the DNS application	Consultation event on 15th December 2022

Date Received	Topic	Question	Response	Source of question
2022.12.15	General	What role does the Community Council and Local Councillors have in the process?	As part of the pre-application consultation process, the Community Council and Local Councillors are community consultees. Community consultees are notified of the project and invited to provide their comments on the project, if they choose to do so.	Consultation event on 15th December 2022
2022.12.15	General	What risk assessments of the project has been undertaken and how is this managed?	At this stage, no permission has been granted to undertake any work. As such, no detailed risk assessments have been undertaken on the project. However, the applicant has set out the parameters that they will work within - which is set out in the Construction and Environment Management Plan (Appendix 4.1) and the Transport Management Plan (Appendix 2 of Appendix 13.1 of the ES).	Consultation event on 15th December 2022
2022.12.15	General	As an example, what are the baseline and predicted noise levels at Blaenavon Terrace?	The day-time baseline noise limits for Blaenavon Terrace ranged from 40 to 46.4 dB, with night-time limits being 43 - 43.1 dB. The cumulative effect of the proposed development, Pen y Cymoedd and Ffynnon Oer is between 24.1 - 36.8 dB, which is less than the current baseline noise levels. The assessment and conclusions have been undertaken in line with the ETSU-97 guidance. If approved, a condition would be attached to the permission that would control and limit the noise emissions of the turbines.	Consultation event on 15th December 2022
2023.01.09	General	Has air quality been assessed as part of the application?	Air quality was not scoped into the ES by the Welsh Ministers. However, air quality measures have been included within the Construction and Environment Management Plan.	Email
2023.01.09	General	Has shadow flicker been assessed as part of the application?	Yes, shadow flicker from the turbines has been assessed as part of the application and can be found within the Environmental Statement chapter 6 and in ES figure 4.02.6.2., which concludes that there will be no significant effects in relation to shadow flicker.	Email
2023.01.09	General	Has glint and glare been assessed as part of the application?	Yes, glint and glare has been assessed as part of the application and can be found within the Environmental Assessment chapter 6 and in the Solar Photovoltaic Glint and Glare Study in appendix 6.4 of the ES. The ES and appendix concludes that no impact is predicted on roads or dwellings.	Email
2023.01.09	General	Has the visual and landscape impact been assessed as part of the application?	Yes, visual and landscape impacts has been assessed as part of the application and can be found within the Environmental Assessment chapter 7 and in the supporting appendices and figures. The ES and appendix concludes that significant effects are limited to four groups of receptors, as noted in table 7.15 of the ES.	Email
2023.01.09	General	What regard has been given to other nearby projects as part of this application?	The Environmental Statement has assessed other developments (not limited to wind farms) - see appendix 3.4 of the ES that may interact with the project. The cumulative effects of the project and other developments is assessed within each chapter.	Email
2023.01.09	General	Has the effect on recreation and socioeconomics been assessed as part of the application?	Yes, impacts to recreation and socioeconomics have been assessed as part of the application and can be found within the Environmental Statement chapter 14. The ES identifies a minor negative impact upon recreation, albeit largely limited to effects during construction when temporary diversions may be in place on public rights of way. With regard to socioeconomic effects, the project will produce substantial amounts of GVA and safeguard or create hundreds of jobs - both locally and across Wales and the rest of the UK.	Email
2023.01.09	General	Are turbines of this size appropriate onshore?	In 2019, Arup published a report (Assessment of onshore wind and solar energy potential in Wales, Stage 2 - Refinement of priority areas for wind and solar energy) on behalf of the Welsh Government. The report sought to help identify pre-assessed areas for wind energy. The report considered the construction of onshore wind turbines up to 250m to tip in the pre-assessed areas. The Site is within a pre-assessed area for wind and proposes the construction of onshore wind turbines ranging from 165m up to 220m.	Email
2022.12.15	Grid connection	Why can't this project use the grid connection of the wind farms to the east of the site e.g. Pen y Cymoedd?	For security of future supply, assuming that the project is approved, the applicant has secured their own grid connection at Briton Ferry. This is the grid connection offered by the local network operator. Relying upon a third party's grid connection has inherent risks that the applicant has sought to manage and control.	Consultation event on 15th December 2022
2022.12.15	Grid connection	Why doesn't the application include the grid connection?	The applicant's priority is on securing consent for the generation of electricity first and then seeking a connection to the grid if the project is approved.	Consultation event on 15th December 2022
2022.12.15	Grid connection	What grid connection does the project have at Briton Ferry, and do you have to wait until 2036 to connect?	The applicant has a grid connection agreement with National Grid at Briton Ferry already in place. The connection agreement allows for a connection before 2036.	Consultation event on 15th December 2022
2022.12.15	Grid connection	How will the project connect to the grid?	The application indicates in ES appendix 4.14 an indicative grid connection corridor. A high-level assessment of this grid corridor has been undertaken as part of this ES, in line with guidance from PEDW and with regard to the Holford Rules.	Consultation event on 15th December 2022
2022.12.15	Grid connection	When will the grid application be submitted to PEDW?	The applicant will commence work on the grid connection project in early 2023 with that work then informing when an application will be submitted.	Consultation event on 15th December 2022

Date Received	Topic	Question	Response	Source of question
2022.12.15	Ground conditions	Will the project affect drainage on the Site and offsite?	As noted in chapter 11 of the Environmental Statement, possible changes to existing runoff patterns due to the project has been considered and the possible impact considered to be negligible and that this could be further mitigated through the maintenance of vegetation and the implementation of a water drainage strategy. It is noted that there could be interruption to shallow groundwater flow regimes due to the construction and presence of foundations. However, the site design has ensured that turbines are located on shallower peat and on flat ground and with appropriate site drainage, existing hydrogeological regimes will be maintained.	Consultation event on 15th December 2022
2022.12.15	Ground conditions	Has a coal mining risk assessment been undertaken?	Appendix 11.3 of the ES includes a Coal Mining Risk Assessment. Furthermore, we've had a response from the Coal Authority on 16th December advising that they have no objection to the project.	Consultation event on 15th December 2022
2022.12.15	Peat	What depths of peat have been recorded on the Site?	Figure 11.3 of the ES shows the depth of peat across the Site, as well as where the core samples have been taken from. Peat on the site varies from 0.0m (none) to over 3.0m in depth. However, the project has been designed to avoid areas of deep peat.	Consultation event on 15th December 2022
2022.12.15	Peat	How are peat depths defined?	As noted in ES Appendix 11.2 (Peat Management Plan) peat is defined as "sedimentary material consisting of the partially decomposed remains of plant material and organic matter preserved over a period in a waterlogged environment resulting in anaerobic conditions and is considered to be depth >0.5m.	Consultation event on 15th December 2022
2022.12.15	Peat	How has the project considered impacts upon peat?	ES Chapter includes an assessment of peat, that also draws upon ES Appendix 11.2 (Peat Management Plan). The ES chapter concludes that without mitigation, impacts upon peat are considered to be a minor effect. This effect is reached due to the approach taken, as noted in the Peat Management Plan, that seeks to use cross track drains, permeable surfaces and other measures to reduce impacts to surface water flows and reproduce a runoff pattern that mimics the existing regime. Most of the project is located on areas of areas of no or shallow peat (<0.5m) - with small areas located on areas of peat of depths 0.5-1.0m.	Consultation event on 15th December 2022
2022.12.15	Peat	Has the project considered the carbon effects of the project, noting the presence of peat on site?	The possible carbon losses from affecting areas of peat and construction have been factored into the carbon calculator (ES Appendix 11.4) for the projects - which indicates a carbon payback time of 16 months.	Consultation event on 15th December 2022
2022.12.15	Transport	Why can't you transport the turbines using access roads to the north of the Site?	There are some access tracks to the north of the Site. However, these access tracks are not public roads and are within private ownerships and control. Therefore, we cannot use these roads without prior agreement of those landowners.	Consultation event on 15th December 2022
2022.12.15	Transport	Is the road into Tonmawr and up to Blaenavon and Fforch Dwm wide enough to transport the turbines?	Based upon the work we've undertaken to date, the roads are wide enough for us to transport the turbines onto Blaenavon and Fforch Dwm. Further details on this matter are available in ES Appendix 13.1 Transport Assessment and the Transport Management Plan (Appendix B of the Transport Assessment).	Consultation event on 15th December 2022
2022.12.15	Transport	How will emergencies be handled when the turbines are being moved through Tonmawr?	In the case of an emergency, the escorting police would be informed and would take steps to ensure that the blue-light vehicle attending to the emergency could pass unhindered. The entire process is controlled by the escorting police officers in contact with the emergency services control centre. Further details are noted on page 14 of the Transport Management Plan, which is Appendix B to the Transport Assessment which is ES Appendix 13.1.	Consultation event on 15th December 2022
2022.12.15	Transport	Are you proposing changes to the road at Mission Bend and along Fforch Dwm road?	As shown in Annex A of ES Appendix 13.1 Transport Assessment, the mission bend corner onto Fforch Dwm road will be temporarily widened during construction to allow abnormal load access. There will be some road widening and upgrading along Fforch Dwm road and the bridge at the end of Fforch Dwm road will also be replaced and upgraded (further details of both can be found on pp31-32 of Appendix 13.1).	Consultation event on 15th December 2022
2022.12.15	Transport	What happens if one of the vehicles breaks down whilst transporting the turbines?	Due to the specialist nature of the vehicles utilised to move the turbines, they are maintained to a very high level and breakdowns are very rare. Should a vehicle break down the Highway Code will be observed at all times, and measures include but are not limited to removing the vehicle off the road as quickly as possible; consulting with the police escort on next steps; use of warning triangles and other methods of notifying the public and affected users (further details are noted on page 14 of the Transport Management Plan, which is Appendix B to the Transport Assessment which is ES Appendix 13.1)	Consultation event on 15th December 2022

Date Received	Topic	Question	Response	Source of question
2023.01.11	General	Hello Section 15.2.14 states - With the good practice measures that a developer would implement as standard practice Can you please explain what good practice measures are standard practice?	Chapter 15 is a summary taken from previous chapters. 15.2.14 refers to Chapter 11.5 which sets out Inherent Design Mitigation in particular 11.5.5 which sets out good construction practice and methodologies to prevent peat instability within areas that contain peat and peaty soil deposits . These include • Measures to ensure a well-maintained drainage system, to include the identification and demarcation of zones of sensitive drainage or hydrology in areas of construction; • Minimisation of ‘undercutting’ of peat slopes, but where this is necessary, a more detailed assessment of the area of concern would be required; • Careful micro-siting of turbine bases, crane hardstanding and access track alignments to minimise effects on the prevailing surface and sub-surface hydrology. This has been undertaken as an iterative process in collaboration with NPTCBC whereby the majority of built infrastructure is not positioned on depths of peat and peaty soils which does not exceed 0.5 m in depth; • Raising peat stability awareness for construction staff by incorporating the issue into the Site Induction (e.g. peat instability indicators and good practice); • introducing a ‘Peat Hazard Emergency Plan’ to provide instructions for site staff in the event of a peat slide (very low probability) or discovery of peat instability indicators; • developing methodologies to ensure that degradation and erosion of exposed peat does not occur as the break up of the peat top mat has significant implications for the morphology and thus hydrology of the peat • Developing robust drainage systems that would require minimum maintenance • Developing drainage systems that would not create areas of concentrated flow or cause over, or under saturation of peat habitats	Email
2023.01.11	Landscape	I am writing to share with you my opposition to the proposed wind farm, mainly concerning the long term visual impact on the environment it will have. With already several large wind farm developments in the vicinity, close to I believe 80 wind turbines, I believe it is a senseless attack on the Welsh environment, an extractive scheme that will profit a small few far beyond the community that will suffer in the shadow of this development.	The Environmental Statement has assessed other developments (not limited to wind farms) - see appendix 3.4 of the ES that may interact with the project. The cumulative effects of the project and other developments is assessed within each chapter.	Email
2023.01.11	General	14th December 2022 on the Naturalis MFD Windfarm site. Can you explain this omission please? Also modifications have been made to the original PAC report. What are these modifications?	The virtual village hall has been reviewed and questions and answers put up on the website. Since the pre application process started on 5th December, a limited number of documents have been added to the website. These include: minor updates to the plans; inclusion of two plans within the Transport Assessment; the Construction Environment Management Plan was added; and updates to the Collaborative Benefit Report and the Design and Access Statement.	Email

Date Received	Topic	Question	Response	Source of question
2023.01.12	Ground conditions	When I first heard of these proposals I was broadly in favour, my main concern was the impact locally of the construction process and the chaos involved and the cutting off of the village for long periods as the turbines and other loads traversed the village. Since then, as more information has been forthcoming, I have changed my opinion. All of us are probably in favour of renewable energy sources but this particular project has been very poorly thought through. The destruction of a large area of peat bog and the proposal to concrete 20 hectares of surface area combined with so many other negative factors must be resisted. Recent heavy rainfall has served to alert us to the dangers inherent in making changes to existing hills which have coped with our weather for centuries. We want nothing that would risk destabilising the hillside above the village. I have read that the site is classified by the National Coalboard as that of High Risk due to mine workings, if this true it's yet another reason for extreme caution. The more one considers the complexity of the risk factors involved the more one has to conclude that the whole proposal is unwise in the extreme. My wife and I will be unable to attend the consultation evening on the 18th of this month due to ill health but this is not due to a lack of interest! Finally, I want it to be understood that I am unequivocally opposed to the proposal.	The proposed development does not propose the destruction of a large area of peat. Furthermore, the area identified for the solar area will not require concrete underneath the entirety of the panels. The Coal Authority classifies large parts of South Wales as high risk development area but have responded to the pre-application consultation process with 'no objection' to the proposed development, a copy of which will be appended to the Pre-Application Consultation report to be included as part of the applicaiton sent to Planning and Environment Decisions Wales when the application is submitted.	Email
2023.01.12	General	Hello, I understand the closing date of the consultation is the 23rd January 2023. Can you confirm the closing time of the consultation.	Any comments that have arrived by the start of the working day on the 24th January 2023 will be considered.	Email
2023.01.13	General	Hello The PAC report is extremely difficult to navigate in the format it has been presented on the MFD website. The folders are not labelled with their contents. The ES chapters refer to ES appendices in their narrative but these appendices are extremely difficult to find. A document of this magnitude should be presented in an easier format for residents to digest.	The draft Environmental Statement on the website is set out as it will be submitted. A Table of Contents has now also been added to help with navigation. The Non-Technical Summary is a more accessible version of the application that provides an overview of the assessment undertaken.	Email
2023.01.13	The infrastructure	Hello In the PAC Report the site is described as being 1km to the north east of the village of Tonmawr rather than in the village of Tonmawr. Can you give an explanation of this site description?	The turbines at Blaenavon are around that distance from the nearest properties in Tonmawr.	Email
2023.01.13	Ground conditions	Hello Planning, design and access statement: 3.1.7 If the foundation requirements are subject to finalisation and are dependent on detailed ground investigation, what surveys on the ground have been carried out to date?	Several rounds of peat probing have been undertaken on site as part of the design evolution process. An initial peat probing exercise was undertaken in order to determine where peat was present on site and to understand the potential presence of deeper areas of peat. These results facilitated the initial layout design and discussions were held with NPT ecologists to understand better what Council would want to see from the design process going forward. A further two field trips for peat probing were undertaken in order to measure peat depths in more detail at the positions of proposed wind farm infrastructure. Design alterations were carried out between these field trips based on the findings of the more detailed survey work. Details of the peat probing surveys is included in Appendix 11.2: Peat Management Plan.	Email

Date Received	Topic	Question	Response	Source of question
2023.01.15	General	Hello As agreed in the last consultation meeting, the PAC Environmental Statement folders have still not been labelled, as agreed, for ease of reference. Can you let us know when this will happen as we are approaching the 23rd January 2023 which is the last day of the consultation?	See response above regarding Table of Contents - which has been added to the website.	Email
2023.01.15	General	I am writing to yourselves with concern over the proposed turbine development in Tonmawr. Do you think this has been thought out properly. Not only on the logistics of the whole project but actually the impact of our village. Look at the size of these turbines, moving them through narrow roads is just stupid. Tonmawr is a dead end village, people in the village work, various shifts, there is no other way out of the village. What chaos is this going to cause? And what about the structural impact on our village, those turbines stand right over people's houses. And yes they make a noise, they clunk and grind, the wind whistles through the blades, whether moving or not. Are you thinking of people here or just the financial gain, do you care even. If you did you would see what a silly venture this is, the impact it has on people, the fear of maybe some houses coming down. Apparently a corner house may have to come down. That man in there is elderly and has a poorly wife. How do you think he feels? With all the open space with forestry tracks already there suitable, you decide to use a dead end village with one road and situate turbines looking right over the houses.	The email covers a lot of topics - all of which are assessed within the application material available. However, the following seeks to summarise how we have addressed the points raised (details of which are expanded in other FAQs noted above). The Transport Management Plan outlines how vehicles will travel to and from site during the construction phase, including the Abnormal Indivisible Loads that will move the turbines. As part of any consent, and recently confirmed by Neath Port Talbot Council, we would undertake pre- and post-construction surveys of the road to identify any impact during construction. Noise from the turbines has been assessed in detail and regard had to advice from Neath Port Talbot Council. The wind turbines will have to comply with noise thresholds, that will be agreed with Neath Port Talbot Council and the Welsh Government. The thresholds have regard to industry standards and parameters set by the World Health Organisation. If approved, the project will provide a community benefit fund, at a rate of £5,000 per year per MW of wind energy generated. This, alongside other initiatives in respect of local ownership and shared ownership, are set out in the Collaborative Benefits Report. The applicant does not have compulsory purchase powers and does not propose the demolition of any residential properties as part of the proposed development. There may be some temporary diversions to a limited number of existing Public Rights of Way but the proposed development will not close or divert any Public Rights of Way. The Welsh Government has renewable energy generation targets that they want to achieve, as part of their transition away from the use of fossil fuels. This project, along with others, would help to reach and go beyond those targets, if approved.	Email
		What do you want to do fill Wales with turbines. Wales is a gorgeous country which is being spoilt by greedy thoughtless people who will gain financially. Plus this area is full of old mine shafts, boggy ground, peat, wildlife, cairns and scars from it's previous industry. It has regenerated beautifully and now it is going to be spoilt again. How many turbines do you want to put up to make it worth while. Obviously there will be more as I have heard about the 40 year lease. And with the weather changing becoming wetter and windier, take in to account this turbines don't run in high winds, but the wind will whistle through the blades none the less. The pylons make enough noise during wind. So what about hydro power? Seems a less imposing, more viable solution with more benefits. And when the turbines are deemed useless what will happen to the masses of concrete, the turbine, the blade etc. Left to rot on the mountain side. You really need to look outside the financial gain at times and be more realistic and thoughtful of Wales and it's people. I look forward to a response.	The site is located within a pre-assessed area for wind energy, as defined by the Welsh Government in a document known as Future Wales. The pre-assessed areas define areas where turbines of up to 250m tip height are considered to be acceptable, subject to criteria within Future Wales. An assessment of the proposed development against these policies and criteria is set out in the Planning, Design and Access Statement. Both the Welsh Government and Neath Port Talbot Council have declared a climate emergency. This declaration reinforces the need to transition from fossil fuels to renewable sources of energy generation. A full suite of surveys has been undertaken to understand and assess the biodiversity interests on the Site. Furthermore, the applicant is proposing a variety of measures to both maintain and enhance biodiversity on the Site, which is set out in the Outline Habitat Management Plan. Extensive peat surveys have been undertaken across the Site to understand the presence, depth and characteristics of peat, where present. The results of these surveys have been used to inform the site design, avoiding areas of deep peat where possible The application has factored in changes in the natural environment as a result of climate change and how the projected changes may change any impacts over time. The proposed development does not include the physical grid connection to Briton Ferry. The grid connection will be a separate application in due course. As noted elsewhere, the applicant already has a grid connection agreement with the DNO at Briton Ferry. As part of the application documents, we have set out how we would decommission the turbines in 35 years time, if approved.	
2023.01.31	General	What are the noise levels at the end of Johns Terrace?	As noted in ES Appendix 8.1 Environmental Noise Assessment, the ETSU-R-97 noise limit for Johns Terrace (end) is a maximum of 46.4dB for daytime and 43.1dB for night time (table 4 and 5, respectively). The difference between those limits and the predicted cumulative wind farm noise is -3.2 dB and -4.9 dB in the worst case scenario (table 13 and 14 respectively) i.e. the noise of the wind farm is predicted to be at least 3.2 dB less than the limit.	Email

Date Received	Topic	Question	Response	Source of question
2023.01.31	The infrastructure	Why was the height of the turbines on Mynydd Blaenavon reduced?	Following informal public consultation on 14th July 2022, the project team considered the representations made by interested parties. Noting the comments about the height of the turbines at both Mynydd Blaenavon and Mynydd Fforch Dwm, the decision was taken to reduce the height of the turbines at Mynydd Blaenavon (where concerns were raised) and increase the height of the turbines at Mynydd Fforch Dwm (both to ensure sufficient energy generation and to reflect comments from interested parties).	Email
2023.01.31	General	How much carbon will be released back into the atmosphere due to peat disturbance?	In the absence of specific guidance in Wales, the Scottish Government's carbon calculator tool has been used to support this process. The purpose of the tool is to assess, in a comprehensive and consistent way, the carbon impact of wind farms. With regard to carbon from peat disturbance, no site specific measurements for carbon content of peat have been undertaken for the proposed development. Instead the anticipated content of 55% has been used as the expected value - which reflects the typical carbon content and is consistent with an average value for Scottish peat lands and is representative of typical peat in the area. The carbon payback of the scheme is 16 months.	Email
2023.01.31	Transport	Why does the construction vehicle route (through Dwr-y-felin and Neath) differ from that of the Abnormal Load route?	The distribution of development traffic on the network will vary depending on the types of loads being transported.	Email
2023.01.31	Ecology & Ornithology	What consequences to developers face when this happens, given it is an offence to kill any bird? How many Common Buzzards will be killed if the same criteria was applied to this species?	An offence is committed under the WCA (1981) if the killing/injuring is intentional, which, needless to say, would not be the case here. I'd also like to bring your attention to the paragraphs under Table 10.5 and particularly this paragraph, noting evidence that kite 'exhibit a high level of avoidance' of turbines: 10.1.1 This estimate is considered likely to overestimate the potential effects of the Proposed Development on baseline mortality given wind farms have not been reported as hindering red kite population growth (see Sansom et al. 2016), and because there is strong evidence that red kites exhibit a high level of avoidance to collisions with wind turbines, despite continued use of wind farm sites (Whitfield and Madders, 2006). The collision rates we use are therefore likely to be a considerable, precautionary, over-estimation, on a species (red kite) which is doing incredibly well in the UK (and particularly Wales).	Email
			The collision rates are worked out based on flight activity of target species in the vicinity of the proposed turbines. As discussed at the exhibition day, there are certain species which are considered 'target species'. The principal guidance if you wanted to read it is NatureScot guidance, which is adopted in Wales, given there is no Welsh-specific guidance, and target species are defined: https://www.nature.scot/sites/default/files/2018-06/Guidance%20Note%20-%20Recommended%20bird%20survey%20methods%20to%20inform%20impact%20assessment%20of%20onshore%20windfarms.pdf Those non-target species (like buzzard) are not considered to be significantly impacted by wind farms, and so although we record the number seen of buzzard and other non-target species during surveys we do not specifically map their flight activity like we do for target species like hen harrier & merlin which are afforded a higher level of legislative protection and are considered more sensitive to developments such as wind farms. We thus concentrate more of our efforts on those (target) species likely to be most affected by the scheme. This is why we do not assess effects specifically on common buzzard, and it would not just be a case of extrapolating the criteria for red kite to buzzard as it would depend on how much flight activity is in the vicinity of the proposed development (which will differ between the species).	
2023.01.31	General	Can you explain why confidential information is not made available as part of the PAC process?	There is a legal obligation to keep certain survey data confidential under the Environmental Information Regulations 2004 in order to protect certain species from interference. The information is nevertheless shared with the appropriate statutory consultees.	Email
2023.01.31	General	What consideration has been given to the well-being of residents in the community?	In accordance with the Well-being of Future Generations (Wales) Act 2015, the decision maker must be satisfied that the proposal is sustainable development. This includes taking a long-term view (i.e. the proposal would contribute to the current target of 70% of Wales consumed energy by 2030 to come from renewable sources (with a current consultation on 100% by 2035)); how the proposal could help build an economy based on sustainability and the services of the future, as well as a stronger, greener economy as we progress towards decarbonisation, and how any decision would help to embed the response to the climate and nature emergency - and increase energy security.	Email

Date Received	Topic	Question	Response	Source of question
2023.01.31	General	Who are the specialist consultees and can we see their responses?	The specialist consultees include: Welsh Government highways department; Natural Resources Wales (NRW); Welsh Water Dwr Cymru; Neath Port Talbot highways department; Mid and West Wales Fire and Rescue Service; Cadw; Pelenna community council; the Health and Safety Executive; The Coal Authority; Resolven community council; and Tonna community council. As part of the PAC process, all of their responses will be appended to the PAC report, which will be publicly available once the application has been submitted to PEDW.	Email

	Topic	Question	Response
1	Other considerations	There is contradiction in your response to a question raised at the public consultation event on 15th December 2022 regarding disruption to services and utilities. Your response was that there will be no disruption to services and utilities both during the construction and operation of the project. However, you then state that there may be a need to temporarily lower cables during construction which may cause disruption. Can you elaborate what services will be affected and for what period of time?	Services shouldn't be affected. Where cables need to be dropped this will be done in consultation with the local network operator to ensure continuity of supply
2	Other considerations	Question asked at the same event: What risk assessment of the project has been undertaken and how is this managed? Your response was that as permission has not been granted to undertake any work no detailed risk assessment has been taken on the project. How can you submit a planning application of this significance without first carrying out risk assessments and instead rely on desk top assumptions?	The EIA has assessed the environmental effects of the project. The EIA has been compiled with field surveys as well as desktop studies. The project designer will be appointed post planning consent and they will draft the design risk assessment. The EIA will be used to inform the project designer when compiling the design risk assessment of the risks on site and to nearby receptors.
3	Transport	There is a contradiction to your response to a question regarding the roads: you state in that the roads are wide enough to transport the turbines. But the answer to the changes to the mission bend you state that you will need to widen parts Fforch Dwm Road and the mission bend.	The wheel width of an abnormal load vehicle is around 2.9m. Generally speaking, we will look to achieve a road width of around 4.5m. Roads are wide enough for most of the route. Pinch points at corners will require some work. Fforch Dwm road will require scrub clearance and may require stretches where the road may need some widening. This may be done through the road being permanently widened or it may be done through the use of temporary plates and matts as appropriate.
4	Transport	Do you know the impact the road you intend to create to get to Blaenavon will have on the access road and park just below it. Has this been risk assessed?	It will have no impact on it. This will be covered in the detailed design and design risk assessment referred to in the answer to question 2

	Topic	Question	Response
5	Other considerations	Pen-y-Cymoedd wind farm is currently accessible for residents to walk around. I often run around there and occasionally ride my bicycle. I usually meet others doing the exact same thing. It's a great resource for the community to have accessible pathways for leisure purposes. I would like to know if Mynydd Fforch Dwm will be similarly accessible for residents to use the pathways for leisure? Or will it be fenced off and access restricted	Mynydd Fforch Dwm wind farm will not restrict permanent access to any bridleways or public rights of way. There will be a temporary diversion of a minimal numbers of public rights of way during construction (in agreement with Neath Port Talbot Council).
6	Transport	What prevention is in place for the likely occurrence of sink holes? As Eastland Road has already experienced this on more than one occasion. With the increase in volume and weight of lorries this is quite likely to happen	We have been liaising with Neath Port Talbot highways department on the access route and there is a standard suite of surveys that we would expect to complete, including a series of pre-construction surveys, including structural surveys, required as a condition of consent. These surveys will consider potential issues such as drainage, retaining walls, bridge weights, and potential sink holes. Where pre commencement works are required to address any issues identified this would also be established as a condition before works began. This is in the interests of both the community and the applicant, as it would be up to the applicant to address any issues and to pay for it.
7	Energy generation	Will MFD windfarm reduce the yield at Pen-y-Cymoedd?	There may be some impact on the basis that the prevailing wind is from a south westerly direction, but this would be marginal in comparison to the increase in overall generation between the two projects.

	Topic	Question	Response
8	Other considerations	Why has no baseline air pollution monitoring taken place?	From our engagement with Neath Port Talbot Council, PEDW and other consultees air quality has not been identified as a material consideration, to date. This is not uncommon with wind farm applications, as air quality impacts are temporary i.e., during the construction period and considered to be less than significant.
9	Transport	The traffic data seems grossly inaccurate? Will an investigation into this be undertaken?	Part 5.5 of the Transport Assessment sets out where and when traffic data was collected, as well as the method used to count vehicles. We are currently awaiting a written response from the Welsh Government highways department and Neath Port Talbot highways department but our engagement with them to date suggests no concern with our baseline data. If NPT Highways require the surveys to be redone, we will do so but it would not materially change the outcome as mitigation would be a Construction Transport Management Plan (CTMP) which we have already proposed.
10	Noise	No noise monitoring was done at 1 railway terrace where a significant amount of idling and vehicles will be, why was this left out?	The location of noise monitoring surveys was discussed and agreed with Neath Port Talbot council as part of the Environmental Impact Assessment scoping stage. The list of receptors location is not intended to be exhaustive but sufficient to be representative of the noise levels typical to those receptors closest to the Proposed Development.
11	Transport	Has a structural survey been completed on Railway terrace?	To date, no structural survey of Railway Terrace has been undertaken by the applicant. As noted in question 6, through engagement with Neath Port Talbot Council a series of pre-construction surveys, including structural, will be required as a condition if the application is approved.

	Topic	Question	Response
12	Pre application consultation	Is the fire station a statutory Consultee?	As part of the Pre-Application Consultation process that we are currently undertaking, Mid Wales and West Fire Authority are a consultee, rather than individual stations. In their response, which will be available in the Pre-Application Consultation report when the application is submitted to Planning and Environment Decisions Wales, they have no objection to the proposed development. As noted in the Transport Management Plan, which is part of the Transport Assessment, the fire department will have direct contact with the police escort during the movement of the turbines via the emergency services control centre.
13	Pre application consultation	Did the coal authority receive information about the whole development and the construction road not just the site?	As part of the Pre-Application Consultation process that we are currently undertaking, the Coal Authority received a copy of all documents and had regard to these when issuing their response. In their response, which will be available in the Pre-Application Consultation report when the application is submitted to Planning and Environment Decisions Wales, they have no objection to the proposed development.

	Topic	Question	Response
14	Biodiversity	There is no ecology data for fforch dwm road. Why is this?	A full suite of ecology and ornithology surveys have been carried out of the Site as detailed in the Chapter 9 'Ecology' and Chapter 10 'Ornithology' with surveys following standard NatureScot guidance (in the absence of Welsh-specific guidance). This included ornithology surveys across the year (to account for the breeding, wintering & migratory periods when the bird assemblage is likely to seasonally differ) and ecology surveys undertaken during the growing/active seasons for the flora/fauna in question (and following industry guidance). The area within the red-line boundary (see Figures 9.1-9.7) were subject to ecological survey and this included along the Fforch Dwm Road (see for example habitats in this part of the Site as shown in Figure 9.3 and description of habitat within the Site, including along the Fforch Dwm Road, in Chapter 9 'Ecology'). The Appendix 9.2 'Protected Species' also confirms that the Fforch Dwm Road part of the Site was subject to an extended phase 1 habitat walkover survey in August 2022, where evidence of protected mammals was search for (see Section 2.3).
15	Transport	Will the wall need to be removed at the TA CENTRE on Eastland Road?	As shown in drawing no. SK08A (B4434 / B4287 junction) in ES appendix 13.2, no works are proposed to the walls of the TA Centre on Eastland Road.
16	Transport	Will the BT box at the entrance to Tonmawr need to be removed?	As shown in drawing no. SK12A (B4287 / Ton Mawr Road) in ES appendix 13.2, one traffic sign, pedestrian guardrail, one junction box (assumed to be the BT box referred to), one utility pole and one bus stop may have to be temporarily removed. If the BT junction box does need to be temporarily removed, it will be done in consultation with BT to minimise impact

	Topic	Question	Response
17	Transport	What will happen to the red brick bridge?	As noted in our response to question 6, we have been liaising with Neath Port Talbot highways department on the access route and there is a standard suite of surveys that we would expect to complete, as a condition of consent. As shown in drawing no. SK15A (Ton Mawr Road South of Tonmawr) no works are proposed to the red brick bridge. One traffic sign, three bollards and overhead utilities will be temporarily removed. All works will be undertaken by the network operator to minimise the impact.
18	Energy generation	What is the expected route to the network?	The applicant has secured a grid connection contract with the local DNO. The required connection works between the Site and the existing distribution network at the Briton Ferry substation will be the subject of a separate application. An indicative grid corridor is shown in ES Figure 4.14
19	Other considerations	Are you concerned your surveys are sub-standard when the community can see clear omissions and disparity in the reports?	ES Appendix 1.1 Assessor Information sets out the relevant expertise, qualifications, accreditations and experience of the consultants who have prepared the ES. Prior to the assessment of the application, Planning and Environment Decisions Wales will consider the adequacy of the ES and the information therein.

	Topic	Question	Response
20	Ground conditions	With all the increase in severity of extreme weather events predicted over the coming decades what specific criteria is being used to assess prevention of landslides? ref: https://blog.metoffice.gov.uk/.../extreme-events-on-the.../	Section 11.4 of the Environmental Statement discusses peat and the potential for peat slide. A separate peat slide risk assessment was not undertaken on the site. As the design process purposely avoided any areas of the site that would mean that a peat slide risk assessment would be required. Figure 11-3 of the Environmental Statement shows that the areas of deeper peat are located on land with very shallow or flat slopes and therefore where peat slide risk is negligible. Additionally, following consultation with NPT ecologists, all proposed development has been situated in areas of shallow (less than 0.5m deep) or no peat.
21	The infrastructure	What tornado (T1-10 rating) are the proposed turbines safety rated for? T3 recorded in Wales this year https://www.bbc.co.uk/news/uk-wales-61046862	The exact turbine model has not been selected yet, only an indicative size and representative candidate turbines. The turbine manufacturers are required to only provide turbines suitable for the specific site. Known, expected and extreme case wind regimes at the site are taken into consideration. Renantis owns and operates many wind projects in the UK
22	The infrastructure	What storm/force/wind rating are the proposed turbines safety rated for? Beaufort Scale: https://www.weather.gov/mfl/beaufort	
23	The infrastructure	For how many years does the storm/tornado/windspeeds safety rating last for?	The design life of the turbine which is 30-35 years depending on model.

	Topic	Question	Response
24	Insurance & liability	How often will the safety of the turbines be tested during its lifespan?	The turbines are continuously monitored 24x7 both by an onboard controller and remotely by engineers. If any of the safety critical elements are not responding or behaving correctly the turbine will stop automatically and an engineer team will be sent to visit the turbine. The turbines will receive a comprehensive service at regular intervals during the year, when all the safety critical features are tested and recertified. The equipment in the turbine associated with lifting and fire protection are inspected at least once per year according to UK legislation.
25	Insurance & liability	It has been stated that if any damage occurs to private or public land or property Naturalis has insurance to cover it... so which legal authority is responsible for protecting residents by making sure the insurance cover is comprehensive.	Renantis will work with experienced contractors who will have built wind farms and therefore this aspect will be covered. Nevertheless, there is another layer of scrutiny in terms of Banks who will also be carrying out their due diligence on the project and contractors to ensure things like insurance are in place and sufficient. It should be noted that during construction, in particular the delivery of materials and components to site, all vehicles must have appropriate insurance according to UK law.
26	Insurance & liability	Does Naturalis's insurance specifically fully cover 3 party damage in the event of turbines breaking (A) due to storms? (B) due to material/structural failure? (C) fire?	Losses to 3rd parties incurred as a result of turbine malfunction caused by, material/structural failure or fire will be covered by operational insurance policies and turbine manufacturer warranties.
27	Insurance & liability	Does Naturalis's insurance specifically fully cover 3 party injury or loss of life in the event of turbines breaking (A) due to storms? (B) due to material/structural failure? (C) fire?	

	Topic	Question	Response
28	Insurance & liability	How much is the insurance cover for (A) per person? (B) per household?	In the highly unlikely event of an incident occurring there will be at least a £5 million of Public Liability limit of indemnity per claim.
29	Insurance & liability	What are the contact details for the department within Naturalis will members of the public need to contact in the event that they experience any damage or loss due to the MFD wind and solar farm going ahead?	Prior to construction starting we will have a kick off meeting to ensure that the communities are updated on the next steps and able to reach out to us and so we will provide contact details of the onsite construction manager working to deliver this project. Meetings will be held regularly to update the communities during construction with details of any key milestone events being pre-notified. During operation the contact person would be the operations manager. Contact details will be on clear signage at the site entrance, on each turbine and will also be lodged with local emergency services, as well as the grid operator.

	Topic	Question	Response
30	Ground conditions	Hydrology is a major issue on the Blaenavon site and of great concern to residents especially due to all the increasing exceptional weather event, including flooding. See attached photos and links for examples of recent landslides. What specific safety features will be put in place to ensure there will not be any landslides from (A) the earth dug out from the turbine foundations? (B) the bog at the top of Blaenavon? (C) the mountainside which has been recently dug over/destabilized and planted with saplings. See BBC article and video of landslide... "Storm Dennis caused multiple landslides - as well as major floods - across the country, including one at Tylorstown, Rhondda Cynon Taff, caught on camera." "Storm Dennis: Why Wales is prone to landslides" https://www.bbc.co.uk/news/uk-wales-51546971	Specific measures to address the points raised: A) the excavation of earth for turbine foundations will be managed by the principles set out in the Peat Management Plan (Annex 11.2 of the Environmental Statement). This covers the excavation, storage and reuse of peat and soils. B) Section 11.4 of the Environmental Statement discusses peat and the potential for peat slide. A separate peat slide risk assessment was not undertaken on the site. As the design process purposely avoided any areas of the site that would mean that a peat slide risk assessment would be required. Figure 11-3 of the Environmental Statement shows that the areas of deeper peat are located on land with very shallow or flat slopes and therefore where peat slide risk is negligible. Additionally, following consultation with NPT ecologists, all proposed development has been situated in areas of shallow (less than 0.5m deep) or no peat. C) Design of the wind farm has needed to take into consideration the recent planting on Blaenafon and all tracks and turbines avoid the recently planted area. Some evidence states that the planting of trees can stabilise peatland and protect from degradation and erosion.

	Topic	Question	Response
31	Mining	In light of the recent horrific old mine burst flooding the village of Skewen, in the wake of Storm Christoph, in January 2021 the residents of Pelenna need answers to the following questions... Where are the mine shafts in the Pelenna located? A 3D map will be needed to assure residents that Naturalis know where these disused mineworkings are. https://www.walesonline.co.uk/.../skewen-floods-flooding...	We have prepared a mining risk assessment (Appendix 11.3) as part of the Environmental Statement and the Coal Authority are included as a statutory consultee for the planning process. The Coal Authority manages the effects of past coal mining, including subsidence damage claims which are not the responsibility of licensed coal mine operators. It deals with mine water pollution and other mining legacy issues as well as providing a review of planning applications submitted in their areas. The Coal Authority have responded to the PAC stating no objection. The shallowest coal present below the site is the Mountain Seam which appears to comprise two leaves of coal at a depth of approximately 65m in the north of the site dipping to over 75m in the south. The report states that the seam in this area was worked and located at a depth which poses a low risk.
32	Mining	When were the old mines in the Pelenna last inspected by the Coal Authority?	The Coal Authority report that all mining in the area is historic, with the last areas mined being in the 1950's. All mines were subject to mine abandonment plans, managed by the Coal Authority.
33	Mining	What is the inspection criteria for the condition of the old mines?	The mining risk assessment prepared as part of the Environmental Statement (appendix 11.3) assessed the shallowest coal present below the site to be the Mountain Seam which is present at a depth of 65m - 75m. The works are at significant depth beneath the proposed turbines and are assessed as being a low risk. There is no significant risk to historic mine workings from the development proposals. The Coal Authority will be able advise further on inspection and assessment criteria for historic workings.

	Topic	Question	Response
34	Mining	What are the category ratings for the condition of each aspect of the mines which are inspected?	The mining risk assessment prepared as part of the Environmental Statement (appendix 11.3) assessed the shallowest coal present below the site to be the Mountain Seam which is present at a depth of 65m - 75m. The works are at significant depth beneath the proposed turbines and are assessed as being a low risk. There is no significant risk to historic mine workings from the development proposals. The Coal Authority will be able advise further on inspection and assessment criteria for historic workings.
35	Mining	What year was this criteria last updated?	The mining risk assessment prepared as part of the Environmental Statement (Appendix 11.3) assessed the shallowest coal present below the site to be the Mountain Seam which is present at a depth of 65m - 75m. The works are at significant depth beneath the proposed turbines and are assessed as being a low risk. There is no significant risk to historic mine workings from the development proposals. The Coal Authority will be able advise further on inspection and assessment criteria for historic workings.
36	Mining	What is the current state of the old mine workings in the Pelenna?	The Coal Authority report that all mining in the area is historic, with the last areas mined being in the 1950's. All mines were subject to mine abandonment plans, managed by the Coal Authority.

	Topic	Question	Response
37	Mining	How will the creation of the massive foundations for the proposed turbines possibly impact the mine water outflow?	Development of the wind turbine foundations will be in the upper soils and peat with foundations based on the top of local bedrock. The mining risk assessment prepared as part of the Environmental Statement (Appendix 11.3) assessed the shallowest coal present below the site to be the Mountain Seam which is present at a depth of 65m - 75m. The works are at significant depth beneath the proposed turbines and are assessed as being a low risk. All hydrology in the soils and peat will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. A surface water drainage plan will be prepared as part of the detailed design (following determination) and will be secured by planning condition as part of the Construction Environmental Management Plan (CEMP).
38	Other considerations	Many properties in the village which are below Bleanavon farm have underground water/springs/streams running through them, so there are grave concerns that any diversion of water caused by the proposed wind turbines could impact foundations of homes. Residents need to know what the Naturalis hydrology impact assessment reveals on how the creation of the massive foundations for the proposed turbines could impact these watercourses and the safety of the foundation of buildings.	All hydrology in the soils and peat around the turbines and tracks will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. A surface water drainage plan will be prepared as part of the detailed design (following determination) and will be secured by planning condition as part of the Construction Environmental Management Plan (CEMP).

	Topic	Question	Response
39	Mining	Does the Coal Authority inspectorate have updated criteria to withstand the Extreme Weather Events which are predicted to increase greatly by the Met Office?	Whilst we cannot comment on the information that the Coal Authority use in any assessment they undertake; we understand that as part of their business plan for 2022-2025 the Coal Authority have an action to understand and recognise the impacts of climate change and extreme weather events on their estate and operations with a clearly defined adaptation plan.
40	Mining	If not, how can the mines (and therefore homes in the village) be deemed safe to cope with the dual impact of both Extreme Weather Events AND the impact to geology and hydrology of the proposed MFD.	We cannot comment on Coal Authority plans for future management of mine water in the local area. The mining risk assessment prepared as part of the Environmental Statement (Appendix 11.3) assessed the shallowest coal present below the site to be the Mountain Seam which is present at a depth of 65m - 75m. The works are at significant depth beneath the proposed turbines and are assessed as being a low risk. All hydrology in the soils and peat around the turbines and tracks will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. A surface water drainage plan will be prepared as part of the detailed design (following determination) and will be secured by planning condition as part of the Construction Environmental Management Plan (CEMP).

	Topic	Question	Response
41	Mining	Due to the extensive networks of disused mine workings in the Pelenna Valley we have two huge mine-water multiple reed-bed filtration systems in place, which within the last 10 years had to be upgraded to cope with extreme weather events. The one at the Garth had to be done twice as the first attempt to manage the additional mine water outflow was immediately overwhelmed and a much more extensive catchment had to be built to prevent the river being polluted. In light of this what is the potential impact of the vast turbine foundations damaging or altering the hydrology of the toxic mine water?	All hydrology in the soils and peat around the turbines and tracks will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. This localised management of hydrology and the maintenance of existing regimes will ensure there is no potential for impact on mine water.
42	Insurance & liability	Will Naturalis corporation be liable for any additional mine water filtration works necessary during the duration of their business, or will tax payers be expected to pay?	If there are additional mine filtration works necessary, that are directly attributable to the MFD project then these will be dealt with by the project.
43	Transport	How do they intend to get the blades and towers to the site using blade lifters and abnormal loads that require safety critical highway infrastructure to be removed?	Within ES Appendix 13.1 Transport Assessment, appendix A of that document is a Transport Management Plan. The Transport Management Plan sets out how the delivery of abnormal loads associated with the proposed development will be undertaken, albeit it does also contain elements relevant to the transport of other non-abnormal materials.
44	Transport	Are they going to produce the concrete for the bases on site to avoid tens/ hundreds of HGV movements per day per turbine and if so won't the raw materials have to be transported there?	The ES has assumed a worst-case scenario of ready-mix concrete deliveries travelling to and from the Site. As noted in our response to question 57, the peak construction month is month 5 with 170 journeys per day at peak (85 inbound, 85 outbound) with HGVs comprising 142 of those journeys (71 inbound, 71 outbound).

	Topic	Question	Response
45	The infrastructure	Are they going to partly paint the blades a contrasting colour to reduce avian collisions?	The application does not propose to partly paint the blades a contrasting colour. This concept is still in its relative infancy, albeit has been trialled in Scandinavia, where effects on white-tailed eagles had some positive results. However, in the UK it hasn't been adopted due to increased impacts in relation to Landscape and Visual - if it's noticeable to birds then the same applies to human receptors - and its effect on species other than white-tailed eagles is unknown.
46	The infrastructure	Are they going to switch off turbines at dusk to reduce the risk of barotrauma to bats?	There is a commitment, as a precaution, to reduce turbine rotation speed while idling, resulting from feathering, which can reduce bat fatality rates by up to 50%, as detailed in Section 9.11 of Chapter 9 'Ecology'.
47	Ground conditions & Biodiversity	Are they going to avoid areas of peat bog and rare flora & fauna?	Design iterations of the proposed development have been sensitive to those most ecologically valuable habitats (such as bog and flush habitats) and such habitats have been largely avoided, as detailed in Chapter 9 'Ecology'. Given these habitats are considered most suitable for fauna, such as reptiles, with buffers also applied between turbines and habitats features (like forest and watercourses), the scheme design has been sensitive to the most valuable areas for notable flora and fauna.
48	Energy generation	Is there local capacity to connect to the Grid?	As noted in response to question 18, the applicant has secured a grid connection contract with the local DNO. The required connection works between the Site and the existing distribution network at the Briton Ferry substation will be the subject of a separate application. An indicative grid corridor is shown in ES Figure 4.14

	Topic	Question	Response
49	Heritage	Are they going to protect historic sites?	Chapter 12 of the Environmental Assessment assesses the impact of the proposed development on archaeology and cultural heritage. The application has considered and assessed impacts to historic sites and, where identified, mitigated any impacts.
50	Noise	Are the blades to have serrated edges to reduce noise?	As noted in response to question 51, if approved the proposed development will have noise threshold which it will have to comply with. Whether this compliance is achieved with or without serrated edges is yet to be confirmed.
51	Noise	Are the predicated night-time noise levels to be less than 35dBA and not ETSU R97 levels?	The night-time noise limit is derived from background noise data measured during the night-time periods (23:00 - 7:00). The fixed lower night-time limit of 43dB was set in ETSU-R-97 on the basis of World Health Organization guidance for the noise inside a bedroom and an assumed difference between outdoor and indoor noise levels with windows open. Table 5 of ES Appendix 8.1 Environmental Noise Assessment sets out the night-time noise limits and table 14 sets out the difference between these limits and the cumulative predicted wind farm noise immission levels. Table 16 sets out the specific apportioned night-time noise limits for the Proposed Development.
52	Shadow flicker	What are the predicted incidences of Shadow Flicker?	Table 6.4 of the ES (within chapter 6) sets out the outputs of the shadow flicker assessment. The table and subsequent analysis conclude that of the 97 properties assessed, only two properties may potentially experience shadow flicker, but this assessment does not take into consideration the screening effect of anything located between the wind turbines and the properties such as trees.

	Topic	Question	Response
53	Other considerations	What are the predicted effects on Amateur Radio, broadcast tv and radio, and critical communications infrastructure signal paths?	As noted within ES Appendix 6.2 Telecommunications Impact Assessment, whilst the Joint Radio Company had an initial objection to the proposed development this has been removed and they have no objections to the proposed development. Similarly, there was an initial objection to the location of one turbine (T2) from the telecommunications provider, but this has since been mitigated and the objection has been removed.
54	Other considerations	Has the CAA & MOD been consulted as low-flying military aircraft are common as well as air ambulance and rescue helicopters?	As noted in chapter 6 of the ES, the applicant has engaged with Nats, Cardiff Airport and the Ministry of Defence on the Proposed Development as part of the EIA scoping stage. The Ministry of Defence advised the applicant in November 2022 that they have no objection to the proposed development. Similarly, the Civil Aviation Authority advised in December 2022 that they are satisfied with the design of the proposed development.
55	Shadow flicker	In your shadow flicker report the 'sunshine days' are estimated very low. Based on this, how is it viable to have an 11-hectare solar array based on this estimation?	Chapter 6 of the ES states that historic Met Office data has been used for the nearest location to the site, St Athan. Between 1991-2020 the station recorded an average of 38.6% of total daylight hours as sunshine hours. Solar panels generate electricity from direct sunlight, diffused sunlight (e.g., through clouds) and reflected (e.g., reflected from other surfaces before reaching the panel). As such, whilst the sunshine days may be the most effective generating days, the solar panels will still generate electricity on days that are not defined as sunshine days within the shadow flicker report - as they are two separate definitions.

	Topic	Question	Response
56	Transport	How many vehicles will be travelling through the villages in the Pelenna in order to construct and complete the proposed wind farm?	As noted in response to question 57, the peak construction month is month 5 with 170 journeys per day at peak.
57	Transport	Appendix 11.4 m states each foundation will be 900m3. Specifically does this mean it will require approximately 788 concrete lorries, which will be approximately 1576 passes through the village and surrounding area?	The 900m3 figure noted in ES Appendix 11.4 Carbon Calculator is an estimate that is subject to revision at the detailed design stage. As set out in section 6.1.5 of the Transport Assessment (ES Appendix xx), we have assumed that a total of 1,404 total journeys (i.e., 702 inbound, 702 outbound) will be undertaken over a four-month period. Table 12 of the Transport Assessment sets out a profile of traffic movements per month. The peak construction month is month 5 with 170 journeys per day at peak.
58	Transport	The above calculations (Question 57) for lorries DO NOT INCLUDE 11 hectares of concrete for the solar arrays, So how many lorries will the cement for the proposed solar arrays require?	Calculations included for concrete deliveries to the potential Solar Farm. Solar arrays are most likely to be supported on direct piled galvanised steel supports without concrete footings.
59	Transport	How many additional vehicles will be required for all aspects of the infrastructure construction and completion of the solar array, including the crane pads, the substation and site building foundations?	Table 12 of ES Appendix 13.1 Transport Assessment provides a profile of the vehicle movements over the 12-month construction period against each activity. As noted previously in question 57, the peak construction month is month 5 with 170 journeys per day at peak.

	Topic	Question	Response
60	Ground conditions	There have been ongoing issues for many years of flooding on the only road giving access to Tonmawr, locally known as the Windies, but despite the considerable improvements made in 2022, the ever increasing intensity of rain has already in January 2023 out-stripped the capacity of civil engineering works for estimated capacity, causing multiple occasions of flooding to the only road access to Tonmawr and associated safety issues. Once again this raises the question to Natralis: What extreme-weather capacity and calculations are being used by Naturalis to ensure the protection of the hydrology of the Pelenna Valley and subsequent protection of the village of Tonmawr from flooding, for the whole of the life-time of the proposed MFD Wind Farm, in this specific case safety and open access of public highways.	Flood risk is considered in the Flood Consequence Assessment (FCA), included at Appendix 11.1 of the Environmental Statement. Natural Resources Wales are the statutory consultee for review of the FCA. Section 5.0 of the FCA deals with climate change and the potential for more extreme weather in the future. The assessment follows guidance with regard to the impact of climate change on flood risk and drainage, provided by NRW in September 2021.
61	The infrastructure	Why is Naturalis intent on putting huge turbines so close to houses?	The applicant has considered several constraints in designing the proposed development, including proximity to receptors. These constraints have been considered in light of the climate emergency that Neath Port Talbot Council and the Welsh Government have declared and the associated renewable energy targets to help shift from fossil fuels.

	Topic	Question	Response
62	Ground conditions	Will the destruction of the peat bog on Mynydd Blaenavon cause flooding to the village of Tonmawr?	The extraction of peat has been assessed as part of Chapter 11 of the Environmental Statement and calculations regarding the volumes of peat to be managed area included in Appendix 11.2: Peat Management Plan (PMP). Any peat extracted on site will be managed in accordance with handling and storage guidance contained within the PMP and all extracted peat will be reused on site. Reuse will include reinstatement of temporary work areas following construction and reinstatement at the edge of tracks and other infrastructure. NPT ecology team are also keen for extracted peat to be used for habitat restoration and enhancement and we are currently engaging with NPT peatland habitat team to see how we can incorporate this into the Habitat Management Plan.
63	The Site	Why will the extracted material from the proposed turbine sites on Mynydd Blaenavon and Mynydd Fforchdwm be left on the mountaintops?	Any peat extracted on site will be managed in accordance with handling and storage guidance contained within the Peat Management Plan (Appendix 11.2 of the Environmental Statement) and all extracted peat will be reused on site. Reuse will include reinstatement of temporary work areas following construction and reinstatement at the edge of tracks and other infrastructure. NPT ecology team are also keen for extracted peat to be used for habitat restoration and enhancement and we are currently engaging with NPT peatland habitat team to see how we can incorporate this into the Habitat Management Plan.
64	The Site	Will the inscribed rock at the side of Fforchdwm Road be safeguarded if the road is widened?	We understand that the inscribed rock is not attached to the ground and could be temporarily moved, if required, so to safeguard the rock.

	Topic	Question	Response
65	The infrastructure	Will the residents of Railway Terrace be compensated for the inconveniences (noise, dust, traffic delays etc) they will face during the construction of the proposed new road from Railway Terrace to Mynydd Blaenavon?	Residents will not be directly compensated but the developer will work to minimise inconvenience as much as possible and the community as a whole will benefit from the community benefit package and co-operative.
66	Biodiversity	Biodiversity -Residents feel that there is a shortfall of the surveys to potentially identify all of the species that are in the area with some surveys being carried out that miss some seasonal species that they have identified as being in the area. Also, they feel that some critical areas, such as , fforch dwm road, the area at the Mission bend, etc, are rich in biodiversity but show no evidence of having surveys carried out.	A full suite of ecology and ornithology surveys have been carried out of the Site as detailed in the Chapter 9 'Ecology' and Chapter 10 'Ornithology' with surveys following standard NatureScot guidance (in the absence of Welsh-specific guidance). This included ornithology surveys across the year (to account for the breeding, wintering & migratory periods when the bird assemblage is likely to seasonally differ) and ecology surveys undertaken during the growing/active seasons for the flora/fauna in question (and following industry guidance). The area within the red-line boundary (see Figures 9.1-9.7) were subject to ecological survey and this included along the Fforch Dwm Road (see for example habitats in this part of the Site as shown in Figure 9.3 and description of habitat within the Site, including along the Fforch Dwm Road, in Chapter 9 'Ecology'). The Appendix 9.2 'Protected Species' also confirms that the Fforch Dwm Road part of the Site was subject to an extended phase 1 habitat walkover survey in August 2022, where evidence of protected mammals was search for (see Section 2.3).

	Topic	Question	Response
67	Biodiversity	There is consideration for the impact to the Pelenna river, but, it states that fish numbers are low and doesn't list all the species that are there. NRW have just installed fish passes at the Garth end of the river to promote Salmon spawning so this report is missing this.	Scheme design iteration has been sensitive to watercourses with buffers (50m) from watercourses (except for any necessary crossings which are sensitively designed to allow the continued free movement of wildlife, like fish) and a commitment to adopt pollution prevention controls during the construction and operational phases of the scheme. The embedded mitigation and good practice measures detailed in Chapter 9 'Ecology' and summarised here are applicable regardless of the specific fish species using watercourses, like the Pelenna River, and/ or the presence of the fish pass.
68	Ground conditions	The Reed beds in Garth have not been mentioned in reports, residents are worried re the impact of traffic travelling adjacent to these and the potential impact to the beds, then ultimately the river, if there is disturbance in anyway.	Highway drainage is separate to the treatment flows within the reed beds. Any alteration to the highway will be within the existing highway corridor only and will not extend onto land occupied by the reed beds. Any upgrade of the road will need to take highway drainage into consideration. There will be no change to existing drainage regimes from the proposed works or traffic movements.
69	Transport	Recorded Traffic- the data collated of existing usage on the fforch dwm and Tonmawr Rd is obviously not correct with existing numbers shown as being well overestimated, this has been acknowledged by Naturalis. These inflated numbers then skew the perceived impact on the local roads as the estimated numbers of increased, site traffic show a lesser, untrue impact on these roads?	The traffic surveys are completed to assess whether a trigger point is reached where mitigation would be required. In this case, regardless of the results mitigation is being undertaken anyway in the form of a Construction and Transport Management Plan so whilst the numbers did look surprising, they don't change anything. Should NPT Highways team have concerns and require that surveys are repeated we would be happy to do them again.

	Topic	Question	Response
70	Ground conditions	There are still concerns over the possible increases of surface water that will be the result of the loss of natural absorption when the turbine bases, solar farm base area and construction access roads are installed. We are already seeing an impact of increased water runoff from the tree planting access road which is impacting on the lower Old Parish Road which is now frequently flooded?	All hydrology in the soils and peat around the turbines and tracks will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. The solar farm element of the proposal will incorporate minimal new hardstanding, with access tracks formed of permeable surfaces and all solar arrays raised on stands with slender supporting legs driven into the ground. A surface water drainage plan will be prepared as part of the detailed design (following determination) and will be secured by planning condition as part of the Construction Environmental management Plan (CEMP).
71	Heritage	Has full consideration been undertaken re the impact on historical monuments etc. Residents are concerned re the listed monument, vent shaft, at Garth, and, there are listings of historical encampments on Mynydd Blaenavon as recorded in the archives, but, these aren't listed and aren't identified on the Ladar surveys.	As part of the consideration of the proposed development, the applicant has engaged with Neath Port Talbot Council, Glamorgan and Gwent Archaeological Trust and Cadw. In their response to the Pre-Application Consultation process, which will be available in the Pre-Application Consultation report when the application is submitted to Planning and Environment Decisions Wales, Glamorgan and Gwent Archaeological Trust have raised no objection to the proposed development. We are currently awaiting a response from Cadw.
72	The infrastructure	There are major concerns about the close proximity of the Mynydd Blaenavon turbines, which, have visual and possibly sound impacts due to their position?	The assessment of the proposed development has considered impacts relating to landscape and visual; and noise amongst other matters.

Question from the Representation Action Group		Applicant's response
1. Introduction		
1.2.4	There are many aspects of the Scoping Direction that PEDW issued in June 2022 that have simply not been addressed in the PAC documents, including the very first point which requests further information and guidance be given around the solar array aspect of the development.	As the draft application demonstrates, more information about the solar array is included now than was available at the point of the EIA scoping direction being submitted to PEDW in February 2022. This reflects the design evolution that has taken place and the consideration given to responses from stakeholders.
1.5.1	EIA Regulations require that the whole development be assessed. However, how can this be done when there is little to no detail on the solar array and zero information regarding how the development will link to the national grid.	Details of the solar array are included in the draft application documents. The grid connection is considered as part of this project, as legislation requires, however full details will be included in a separate application in due course (an appropriate and common approach).
1.7	The consultation process both at this time and prior to the PAC, has been abysmal. The delivery of letters was haphazard at best, with many households not receiving their copy. When letters were sent out for this stage of the consultation, they were in white envelopes with 'Homeowner' written on them. Most people will simply think that this is junk mail and this is a foreseeable problem.	The consultation report that will accompany the final application will set out full details of the methods and quantum of consultation undertaken.
	There has also been patchy coverage with regard to electronic means of communication; with the website and Facebook pages updated irregularly; sporadic replies to emails; and different responses given to different interested parties; the virtual village hall was of very poor quality and no accommodations were made for anyone with disabilities or simply no access to the internet. The very bare minimum was done to publicise the events.	The applicant has undertaken consultation that exceeds the minimum requirements set out in legislation (both at this formal stage and previously through informal consultation).
	The events themselves were severely lacking - people weren't logged as they entered; if people attended both events they were only logged once; questions from the public weren't recorded; it wasn't clear who was who or what their roles were within the project; they ran out of paper and stopped recording how many people attended; as with the emails different responses were given to different people asking the same question; the 'experts' were evasive, condescending and at times outright rude.	Following the public consultation events, both in person and virtual, the Applicant has noted the questions raised and added these to a Frequently Asked Questions page on the website.
	In the final consultation event, Quatro didn't even bother to register anyone's attendance - If nothing else, this highlights the lack of attention given to Health and Safety as this would be an event register should there have been an evacuation.	See FAQ 48.
	There has also been very little accommodation made for Welsh speakers.	In line with legislation, notices were issued in both English and Welsh and no requests were received to communicate in Welsh, either in writing or verbally.
2. Site Description		
2.1.2	Trees have now been planted in this area using funding from the Welsh Government. How much of this planting will now be destroyed and will the funding be returned? More importantly, was the funding for the planting applied for by the landowner when they had already made agreements with Naturalis? If so, this is fraudulent use of the WG funding.	The tree planting has the relevant approval and this application is separate to it.
2.1.5	There are already several existing wind farms around the village of Tonmawr, which sits in a horseshoe-shaped valley. The cumulative effect of these along with this new development has not been taken into consideration with particular regard to the noise of these 'on shore' turbines and the echo it will cause in the valley.	The Environmental Statement has considered over 80 projects as part of its cumulative assessment, with a list of those with potential cumulative effects noted in ES Appendix 3.4 and the noise impact assessed in ES Chapter 8 and ES Appendix 8.1
2.1.6	Part of the development is a new access road from Fforch Dwm Road to the Blaenavon site. Little information has been given on the work that will be done in order for this new access as well as the existing Fforch Dwm Road to meet the standard required.	Details relating to the proposed new and improved road infrastructure is included within ES chapter 13 and ES Appendix 13.1.
	The Fforch Dwm Road is currently only a one-lane road and would need major widening for this type of construction and level of traffic. This road has already had issues with both landslips on both sides of the road and floods to the local properties and there is a major concern that this development will only exacerbate this. This is particularly pertinent to the unused mines, etc that are under this road and Blaenavon Mountain. The Coal Authority identifies the entire area as a high risk for development.	Ground conditions have been considered in ES Chapter 11 and its appendices, with ES Appendix 11.3 comprising of a mining assessment.
	There is also the disused Gyfylchi Tunnel which runs from Tonmawr to Cymmer. This was used by trains to transport coal but the Tonmawr end of the tunnel is completely flooded. As with the disused mine tunnels, what may be the impact of the vibrations caused by this development on these aspects?	Noise and vibration has been considered within ES Chapter 8 and ES Appendix 8.1.
	And if there is toxic water or other materials in the tunnels, how will Naturalis stop them from getting into the river and damaging the biodiversity there? The river here has only recently been cleared of previous damage caused by mining, etc and reed beds are now in place (maintained by Severn Trent Water, who have also not been consulted about this proposal) and there is renewed wildlife in the river such as eels and salmon. It would be devastating for this to be allowed to happen again - we should know better.	ES chapter 11 and its appendices, as well as the Construction Environment Management Plan, sets out the approach to water quality, with ES chapter 9 having record to any species or habitats present. Note that The Coal Authority have been consulted about this proposal, as a statutory consultee and an adjacent landowner. The applicant has also consulted Severn Trent Water, who maintain the treatment works as a service provider.

Question from the Representation Action Group		Applicant's response
	There is also a major concern with regard to the properties in Pelenna Close as these have already experienced land issues, leading to the gardens having to have metal rods pile-driven into the mountainside to stop further movement. The increase in heavy vehicles that will be passing along Tonmawr Road (which is to the south and effectively underneath Pelenna Close) will cause further damage to these properties through the increased level of vibration.	In developing the application, we are aware of historic issues that residents have experienced in relation to made ground.
2.2.2	The areas around Tonmawr that have been chosen for this development are key access routes to the wider countryside both for local residents and many visitors to the area. Both the work on Fforch Dwm Road and Blaenavon Mountain will block this access affecting the health and well-being of all as well as the local businesses that rely on the surroundings, such as Bryn Betws.	The proposed development will not stop up or divert any public rights of way. Instead, if approved the proposed development may lead to the enhancement of condition and quality of these routes.
2.2.7	This proposed route is a major point of concern for many interested parties, including the Fire Service as there is an active station in Cimla, several schools, businesses and local residents. In our discussions with other stakeholders, it has been identified that a 'dummy run' has been requested as desk studies will not be sufficient in this aspect. When questioned about this, Tim Mockridge said that a full dummy run would be difficult but it would be done several weeks prior to the actual build itself! How on earth can that be acceptable? The route is at best ill-advised, and at worst, downright dangerous and will cause massive disruption and upheaval for the whole of Neath with road closures and the possible impact of the increased passage of lorries along the route. There have also been recent landslips along the proposed route and the village of Tonmawr would effectively be cut off during the delivery of the turbines themselves. This will mean that for several hours at a time, we will not be able to access or leave the village and neither will emergency vehicles if there is an issue. How can a dummy run of this not be a priority and be left to a couple of weeks before the actual build?	The applicant has consulted with the Mid Wales and West Fire and Rescue service (a copy of their response will be made available in the PAC report). Similarly, the applicant has consulted with Neath Port Talbot highways team and the Welsh Government's highway team (with their responses also available in the PAC report).
	There are also several businesses located in Tonmawr to which the disruption caused will have a massively detrimental effect. 3. Scoping, Consultation and Approach to Assessment Table 3.1 Landscape & Visual: - The extra information given through the use of LANDMAP shows just how far these turbines will be visible, including from the Brecon Beacons National Park. - Requests for further photo montages including the solar array have not been given. - Cumulative assessment has not been carried out.	As noted previously, over 80 projects were considered as part of the cumulative assessment as noted in ES appendix 3.4. The photomontages produced have been prepared in consultation with stakeholders and include the solar array. As noted in ES appendix 8.1, blasting has been considered in the noise assessment. The noise measurements used are to establish the baseline level of noise at present and representative locations then modelled for potential impacts, including Johns Terrace and Blaenavon Terrace. The assessment included both noise and vibration impacts.
	Noise and vibration: - Blasting activities will have a massive impact on the wildlife in the area, as well as on humans. It will also add to the concerns around the safety of the site with regard to landslips. Has any assessment of this aspect of the development been carried out? - There are 4 'indicative' points from a list of 30 that have been used within the ES to measure noise and vibration which can be seen on the map below - Were there assessments carried out on St Johns Terrace and Blaenavon Terrace where the new road will be built behind residential properties for site traffic? - And was there an assessment carried out for Pelenna Close, which we have previously mentioned in 2.1.6? - Did these assessments, in particular for vibration, take into account the impact on the mine works in the area, the	As noted in ES appendix 8.1, blasting has been considered in the noise assessment. The noise measurements used are to establish the baseline level of noise at present and representative locations then modelled for potential impacts, including Johns Terrace and Blaenavon Terrace. The assessment included both noise and vibration impacts.

Question from the Representation Action Group	Applicant's response
- There is also a huge question hanging over this section of the assessment as mentioned in the opening summary - the data gathered is highly questionable in particular the figures for Fforch Dwm Road. However, using these figures, the number of HGVs using this fragile road will more than double during the construction phase. - Without development, the data shows that of the 129 vehicles using Fforch Dwm Road, 22.9 of these were HGVs which would mean a minimum load of 172.5 tonnes being carried along that road. Using the same data, of the 187 vehicles using the road with the development, 74 of these will be HGVs. That will mean an increase in weight being carried along that road from 172.5 tonnes to 555 tonnes - over 3 times the current weight and on a road that has already experienced landslips. - Looking at the data tables produced in Environmental Noise Assessment, the decibel levels produced by the turbines will be close to or over the recommended limit of 35 - 40db, both day and night time. - Borrow pits are stated by Naturalis as not being used. However, in appendix 11.3, the coal mining report states that it includes borrow pits. - At the most recent consultation event, the issue of noise was raised as a concern by a resident, in particular regarding the cumulative noise from other developments in the area. One of the mitigating issues raised in response was referring to the amount of trees in the area and how they will block and absorb noise. However, there has recently been a massive removal of trees in the local area, with many hill and mountain sides now bare. This will surely impact the cumulative noise levels.	Both ES chapter 8 and ES appendix 8.1 indicate that noise levels will be below the relevant limits, during both day and night time. ES Appendix 11.3 states that "The development is likely to comprise ... borrow pits". Since that report was written, borrow pits have been removed from the scheme but the mining condition beneath and surrounding the Site have not changed. The applicant has consulted with both NRW and Neath Port Talbot Council on the surveys undertaken - a copy of their response will be available in the PAC report.
Ecology: - The scoping report questioned the quality of the data used for the reptile surveys. However, the data that has been added to this by naturalis still only covers 2 months of 2022 and is not sufficient to monitor the full lifecycle and activities of the many reptiles in the local area. This is especially important when it is taken into account that many of the local types of reptiles have their mating seasons in April/May/June with many of the offspring being born in July. The months used by naturalis do not cover this key period. - Even though it was highlighted in the scoping report, very little extra information has been included about the impact of the solar array. Naturalis claim a 'detailed description' of the array in Chapter, which isn't there and neither is Figure 4.1 which shows the array's location.	The applicant has consulted with both NRW and Neath Port Talbot Council on the surveys undertaken - a copy of their response will be available in the PAC report.
Ornithology: - Again, there is a lack of assessment for the wider aspects of the development including the solar array and the grid connection. - There is a lack of reliable data used both in terms of being desk-based and the length of time not being adequate. - The assessment only mentions the Red Kite but there are many other species within the site that should be considered - sparrowhawks, buzzards and osprey to mention a few. - The cumulative effect of the development has been very limited and only taken Melin Court Wind Farm into consideration when there are many more developments in the area, built, to be built and in planning, that have not been included.	A grid connection corridor has been provided in ES Figure 4.14 and a high level assessment of this corridor has been undertaken. Full details and assessment will be undertaken in a separate application. Full details of the solar array have been included as part of the application documentation. The use of desktop studies is considered appropriate and where required has been supplemented with site surveys for the relevant periods. The habitats and species assessed reflect those either recorded on site or those protected by legislation. Regard to over 80 other projects has been undertaken with regard to cumulative effects, see Appendix 3.4.

	Question from the Representation Action Group	Applicant's response
	Geology, Hydrology and Hydrogeology and Peat: - Appendix 11.3 concludes that there is low risk to the site due to the existence of mining works in the area. And yet, the Coal Authority considers it to be a high-risk area for planning. Why is there this difference? - Also with regard to this appendix, what are the parameters by which the development is measured? Is it the weight of the turbines? Even though the model hasn't been decided on. Does this include all of the track, cement, etc, etc? - There is a major concern about the impact that this development will have on the flow of water in the area, especially as this is an area with heavy rainfall and is already predisposed to flooding. The main road into the village regularly floods with NPTCBC having placed several culverts along the road. However this has not stopped the flooding, merely lessened it slightly. A large amount of this is caused by water running down from Blaenavon Mountain and the concern is that taking away the peat that is there will make the situation worse. Recently, houses along Railway Terrace have also reported flooding into their houses from the mountain. - As previously stated, many are also concerned about the runoff from the development affecting the health of the nearby river and its ecosystems as well as the quality of all water locally. - Also as previously stated, the Welsh Government are placing massive levels of importance on the maintenance and increase of peat, with their targets recently being tripled. How can this removal of peat be anything other than negative? - What level of damage to the peat and GWDTE areas is considered acceptable? How can any be considered acceptable? - The assessment again concentrates mainly on the turbines with little to no consideration given to the solar array and grid connection.	The designation by the Coal Authority of high risk areas across Wales is largely precautionary. Where development is located in such an area, a mining risk assessment is required (see ES appendix 11.3). The smallest distance between a coal seam and the proposal is 65m (this distance then informs the low risk stated, with a definition of this risk set out in table 3.1 of ES appendix 11.3). Under schedule 3 of the Flood and Water Management Act 2010 all new development in Wales must reduce or significantly attenuate surface water. The proposal will align with the requirements of the Act, with the design and assessment work undertaken to date aligning with these requirements. Surface water run off into rivers will be managed through the Construction Environmental Management Plan. We have consulted with the Welsh Government and Neath Port Talbot on the impacts to peat and how we can effectively reuse and restore any peat excavated as part of the proposal (a copy of their responses will be available in the PAC report). In both preparing an application and in the Minister determining any application, the balance of positive and adverse effects are carefully considered. The methodology and baseline information has been discussed with Welsh Government, NRW, Neath Port Talbot Council and others since the EIA scoping direction was issued. The applicant has utilised the EIA scoping direction in informing the structure, content and approach of the Environmental Assessment.
3.2.2	There are several areas of waste that are being skipped over by Naturalis. As mentioned above, there is the issue of any materials in the tunnels below the proposed development, in particular with regard to mining. There is also concern around the ongoing treatment of the turbines, in particular with the blades and machinery requiring oil to maintain smooth function. Where will this oil run off to? As it will be at the top of a mountain, with all rainfall flowing down into the village and surrounding waterways, it can only go there. However, naturalis has not mentioned this and consider there to be no waste created?	The proposal will not interfere with any material, if present, in the tunnels (mines) beneath the Site. If approved, the infrastructure will require regular maintenance that may include oil based solutions e.g. oil for gearing systems. Any waste would be collected on site and disposed of appropriately.
3.3	As mentioned in 1.7 the consultation throughout this period has been highly problematic with the most recent event held on the 18th January 2023 AGAIN with the naturalis representatives answering "I don't know" to most of the community's questions. A key problem has been the reliance on online methods of promoting the meetings, with an assumption made that everyone is on Facebook, which they most certainly aren't. Also, the initial leaflets that were delivered made no mention of the development on Blaenavon Mountain or the solar array. Overall, there is a feeling in the community of mistrust in naturalis with little being done by them to diminish that, if anything their attitudes, language and actions have only increased the feelings of suspicion.	The applicant revised the format of the consultation event on 18th January 2023 to reflect the needs of the community action group. This revision was done in the moment to help address the comments that the community action group had. As the consultation report will set out, a variety of methods were used to contact members of the public.
3.3.6	It is stated that any issues caused by the development with regards to aviation will be mitigated. What is this mitigation? There are also concerns around the other bodies not mentioned in this ES that use this airspace - for example Swansea Airport, Welsh Air Ambulance and the Police.	The proposed mitigation is set out in ES Chapter 6 and ES appendix 6.1.
3.3.7	At present, telecommunications within the village of Tonmawr is notoriously patchy with only one mobile network able to cover the area. The result of this being impacted would be a massive blow to all residents in the village, from those that work from home to small business owners, children using it for their education, maintaining contact with vital services, etc, etc. A negative effect on this aspect of village life could even make Tonmawr unlivable which would go directly against the whole ethos of the Future Wales Act. The report states that they have identified a possible way to mitigate this but do not state what that mitigation will be.	The proposed mitigation is set out in ES Chapter 6 and ES Appendix 6.2.
3.3.8	During all phases of the consultation the visual effects of the development have been very poorly represented, with some of the images used being of a completely different development. Their quality has been below standard with no mention of the solar array and other supporting infrastructure (including the grid connection) and its effect on the landscape. These turbines will be seen from the Brecon Beacons.	The visualisations of the proposed development have been produced to the relevant standards. Images of other schemes were provided to give context to the applicant's history as a developer. The Zone of Theoretical Visibility was available for all consultation events.
3.3.9	The Pen Y Cymoedd site is situated in a very different topographical position than the MFD development and with the data now being out of date, it doesn't take into consideration the cumulative effect of the proposal. The level of the noise produced both in construction and once the site is running are in the majority above the 40db guide at all points where measurements were taken. This was even the result at the lowest speeds the turbines will move. The noise during construction will have a massively detrimental effect on the entire village but specifically on certain areas of properties that are situated along the construction routes, including Railway Terrace and the now road to be built for access to Blaenavon Mountain.	Pen y Cymoedd is one of the 80 schemes considered as part of the cumulative assessment undertaken, as noted in ES Appendix 3.4. The baseline noise levels include the noise of Pen y Cymoedd as part of our assessment. If approved, noise levels are controlled by condition and monitored during operation.

Question from the Representation Action Group		Applicant's response
3.3.10	Many of the residents within the village are very concerned about the impact the removal of ANY peat will have on the already concerning issue of flooding within Tonmawr. This is a regular occurrence already. The main road into the village has recently had major upgrades from NPTCBC but these are still not enough and the road is impassable when there is heavy rain. As climate change progresses and these weather conditions will increase, the removal of any peat, along with the possible destabilising of Blaenavon Mountain itself, there is genuine fear among residents regarding their safety, with many fearing a repeat of the tragedy of Aberfan.	ES appendix 11.1 is a Flood Consequences Assessment that assesses the risk of flood from and to the Proposed Development. The ES has factored in allowances for climate change. A peat slide risk assessment has not been undertaken as the turbines are located on areas of flat ground where potential for any slide is not considered sufficient to require such an assessment.
3.4.1	There seems to be a massive over reliance on desk studies and where there has been field research carried out, the very bare minimum standards have been met. It is also very worrying that the development is following guidance produced by NatureScot, as there is no specific guidance in existence for Wales. All aspects of the environment in this area cannot be compared to those of Scotland so following these guidelines could have a massively negative impact as they are simply not made for the environment in South Wales.	The relevant standards and methodologies have been utilised throughout the assessment. Any references to Scottish or other non-Welsh guidance have been done so with the instruction or knowledge of third parties e.g. NRW refer to Scottish guidance as NRW/Wales does not have its own.
3.4.9	Throughout the consultation process, where their answers haven't been "I don't know", they have more often than not been "Don't worry, we will mitigate that"! However there has been no explanations of what the mitigations actually are - it seems like a throwaway answer that allows them to respond but actually say nothing of import.	Chapter 15 of the ES provides a summary of mitigation measures.
3.5	It is clearly understood by all that renewable energy sources are key to dealing with climate change. The question remains over whether or not the removal of existing peat and the deaths of native species helps or hinders the progress towards turning the tide of global warming, especially in the case of peat. Again, this is a targeted area defined by the Welsh Government as being vital to the fight against climate change, with the WG also identifying that we are currently in a nature crisis due to the reduction of biodiversity. In an area rich with biodiversity, how much of this has to be sacrificed in order for this development to happen.	In making any decision, the Minister will consider the scheme and its impacts (both positive and negative) in reaching a conclusion as to approve or refuse the proposal.
4. Scheme Description, Alternatives and Design Evolution		
4.2.1	The proximity of the site is less than 1km from residential properties. This is a major concern running through all aspects of the proposal - noise, shadow flicker, visual impact, vibration, landslips, flooding, damage to local biodiversity, general safety, increased traffic, increased pollution, and light pollution, to name a few!	The ES has considered all the topics (and others) in assessing the proposal.
	There is also the important issue of 'ice throw' from the turbines, which could hit and damage buildings and other property. It could also be a severe threat to the public, both local residents and people accessing the local footpaths and cycling opportunities.	Ice throw is addressed in FAQ no. 73.
4.2.2	The proposed widening of Fforch Dwm Road will mean that the residents of Pelenna House will be cut off during the construction phase.	As a public road, any works to Fforch Dwm Road will be agreed upon with Neath Port Talbot Council, alongside engagement with any affected users/residents.
4.2.2	Is the land suitable for the solar array to be mounted on frames? This will also cut off sunlight to the underlying ground and any species that are dependent on it.	Ground conditions for the solar array are considered suitable with final construction methods to be agreed following further site investigations.
4.2.10	The foundation requirements have not been finalised and the same with the turbine models that will be used - how can any figures etc be reliable if these aspects are not fully known?	The ES has been prepared on a worst case scenario, with maximum parameters used to inform the assessment. It is expected that, if approved, the constructed figures and associated impacts would reduce e.g. the 900m3 of concrete for foundations is a maximum.
4.2.14	Will there be an issue of glare from the solar array impacting wildlife and local residents?	ES Appendix 6.4 assesses glint and glare.
4.2.19	The decision for the route from the A465 into Neath and onward to Tonmawr, seems to revolve around the cost of the alternative of going through NRW land rather than it being the most suitable route.	The applicant has considered multiple routes to Site, with the proposed route comprising the only option at this time.
4.2.21	The lack of information regarding the electrical connection to the grid at Briton Ferry is very alarming as this aspect of the site will have a massive impact on residents in the village, whether the cables are over- or underground.	The indicative grid corridor is shown in ES Figure 4.14.
4.3.2	When asked about the construction timescale and how much of the preparatory works were included in that 12-month estimate, Tim Mockridge had no answer at the December 2022 consultations, other than that SOME of the preparatory works weren't included in that timescale. This brings into question the accuracy of the 12-month build timescale.	It is anticipated that construction period would take 12 months, which is reflected within the ES.
4.3.3	How will the monitoring of the CEMP be carried out? Will it be done on-site or desk-based? How often will it take place?	As noted in ES appendix 4.14, compliance with the CEMP is the key control measure during construction to ensure mitigation is appropriately addressed. The Principal Contractor, once appointed, would be required to prepare a series of method statements. These method statements would detail how the contractor intends to implement the mitigation noted in the CEMP and would be integrated into their Construction Method Statements.
4.3.5	How will light pollution be dealt with during the night and working hours especially during the winter period of the construction and running of the site? How often is it anticipated that there will be work taking place on a Saturday or Sunday at 7.00am?	As noted in the CEMP, construction activity is proposed to take place between the hours of 07:00 and 18:00 Monday to Friday inclusive, and between the hours of 07:00 and 16:00 on Saturday. Sunday working is not generally expected however, it should be noted that out of necessity some activities, for example abnormal load deliveries, concrete deliveries during foundation pours and also the lifting of the turbine components, may occur outside the specified hours stated.

Question from the Representation Action Group		Applicant's response
4.3.11	Has there been any consideration to the increase in crime caused by the influx of vehicles etc into Tonmawr? For example, damage to cars and property, speeding, etc. If the construction compound is lit at all times, will this impact the local residents/environment?	The CEMP and the associated method statements prepared by the Principal Contractor will consider this issues.
4.6.1	As stated throughout this report, this development will negatively impact many aspects of the village that are highlighted in Future Wales as being vital.	Noted.
4.6.4	The pre-assessed areas identified by the Welsh Government have been assessed for wind turbines. <i>THEY HAVE NOT BEEN ASSESSED FOR SOLAR ARRAYS</i> and these are two very different types of construction with very different implications for each one.	Noted.
4.6.11	What is 'positive design'?	In the context of the paragraph referenced, positive design is where that design has a positive effect e.g. the re-routing of tracks to avoid areas of deep peat.
4.6.12	The distance between the turbines is mentioned, but not the distance to the village. Neither has it been identified as an issue with regard to the proximity of the new access roads to residential properties.	The paragraph identifies a number of design influences, not all. Proximity to residential properties is a design influence.
4.6.14	As previously stated, the development will massively reduce the local community's access to the green areas around the site, especially during the construction phase	The proposed development will not stop up or divert any public rights of way. Instead, if approved the proposed development may lead to the enhancement of condition and quality of these routes. During construction some of the public rights of way may be temporarily diverted for reasons of health and safety due to proximity to construction activities.
4.6.18 -	Have all aspects of the development's works been assessed for peat? Including the access roads, substations, solar array, etc.	ES Figure 4.4 overlays the proposal onto the areas surveyed for peat.
5. Policy Context		
5.3.1	As the issue of onshore turbines is currently such a divisive issue in England, why is this not causing a similar pause in Wales?	England and Wales have different planning policies, including on their approach to onshore wind farms.
5.3.3	As previously stated, there are certain assessment criteria for this type of development that currently don't exist in Wales, and the default is to use the guidance from NatureScot. The two countries have very different environments and surely cannot be compared on a like-for-like basis?	The Welsh Government and other regulatory bodies refer the applicant and other wind farm developers to Welsh guidance in the absence of guidance authored by the Welsh Government and those regulatory bodies.
5.3.5	The possible damage to aspects of Tonmawr's day-to-day life will be in direct contradiction with the Future Wales Act, in particular with regard to telecommunications and the impact any damage to that in the village will have. Also, the removal of peat, damage to the environment and biodiversity surely goes against decarbonisation, loss of biodiversity, and climate resilience, especially in an area that is already prone to flooding??	Noted - all of these topics, and more, have been considered within the application and both the Inspector and Minister for Climate Change will consider these when making their respective recommendations and decision.
5.3.8	Again, the pre-assessed areas cover wind turbines <i>NOT THE SOLAR ARRAY</i>	Noted.
5.3.9	A presumption in favour of these large-scale turbines - does this presumption still hold when the development is so close to a village? At the December consultation, we asked the lady in charge of the visual design aspect of the plan if there were any other wind farms of this size so close to the properties. We were told that there were, but upon further questioning, the site in question was close to ONE property, which was a farm, not an entire village. These are incomparable.	The pre-assessed areas for wind energy cover large parts of Wales, including residential areas. However, there are additional criteria, which we have considered, in respect of a site's proximity to residential receptors.
5.3.13	As with the contradiction of Future Wales issues raised throughout this report, the development will negatively impact the area in many ways that are highlighted in the Local Development Plan from NPTCBC as being crucial to the borough. This includes, but is not restricted to, impact on bio- and geo-diversity, damage to natural features, climate change (especially with the removal of peat from the site), land stability, increased traffic pollution, and the health and well-being of the local residents with these turbines looming over the village.	The applicant has considered Neath Port Talbot's policies as part of this application - see the Planning, Design and Access Statement. Please note that as a Development of National Significance, Future Wales has primacy over the LDP in the decision making process
6. Aviation and Telecommunications, Shadow Flicker and Safety		
6.1.3	What will be the possible impact of glare from the solar array on passing aircraft? The site is in Class G airspace where there is no requirement for flights to be logged with ATC. Has the plan been assessed in relation to those types of aircraft that regularly fly over the area, including Air Ambulance Wales, etc,? The Strumble CTA is stated as being 5km to the North of the site - is this an acceptable margin of error? 5km for an aircraft seems a very small margin.	The applicant has consulted the Civil Aviation Authority, Ministry of Defence and other airspace operators as part of this application, with no objection from any party to the proposal.
6.1.13	Naturalis are in consultation with Cardiff Airport as they deem the impact of the development unacceptable. Has anything been agreed upon from this and if so, what is it?	The applicant is in consultation with NATS and Cardiff Airport and it is expected that a suitably worded condition can be agreed to address their concern.
Table 6.1	In the scoping report, PEDW queries the impact of the development on the NATS radar. This has not been fully dealt with in the PAC documentation.	As above.
6.1.14	Have the relevant stakeholders given their opinions on the new layout and position of the turbines since the scoping report due to changes made?	The relevant stakeholders were consulted as part of the PAC process and have provided their comments, copies of which will be appended to the PAC report.
6.1.15	Is the added clutter caused by the development within an acceptable range for Cardiff Airport/NATS, especially when considered cumulatively with other wind farms?	The proposal is considered appropriate by NATS and Cardiff Airport.
6.1.18	What will the impact of the aviation lights be on wildlife? And local residents? The skies in this area have very little light pollution and are even a selling point for the area and local businesses.	Aviation lighting is assessed in ES Appendix 6.1

Question from the Representation Action Group		Applicant's response
6.2.25	The closest Met Office that measures the hours of sunshine is in St Athan which is near Cardiff. Cardiff and its surroundings have a very different weather environment than Tonmawr. How can the use of this data give reliable assessments for this development?	The use of data from the nearest Met Office is considered appropriate.
Table 6.4	States that Pelenna House will have a possible 66 days of shadow flicker. Is this an acceptable amount in accordance with Future Wales? What is the standard it is judged by if there is no UK guidance for this type of development?	The assessment of significance draws on Northern Ireland Department of the Environment, Best practice guidance to PPS 18 Renewable Energy.
6.2.42	States that the effects of shadow flicker are significant. At what point are mitigations deemed as viable - if the effect is to 1 property, 10, 100?	As noted in 6.2.43, if a compliant is made in relation to shadow flicker then an investigation would take place.
6.3	As previously stated, EE (BT) is primarily the only network with coverage in Tonmawr and BT is also the only broadband and home phone provider. Any damage or interruption to the services would have a massively detrimental impact on Tonmawr in all aspects of life. We do not have alternatives to fall back on!	Noted.
6.3.5	What is the mitigation that has been agreed upon?	The details of the mitigation are yet to be agreed but a solution has been identified.
6.3.8	The laissez-faire attitude of 'we will deal with reported effects after the development has been built' is not acceptable as this is too late if there is no available or suitable mitigation.	Noted.
6.4	If the site is in a low-risk area, why does the Coal Authority regard it as a high-risk area on its own website? What are the criteria for the risk assessment - is it the weight of the turbines? Or the vibrations caused by them? Does the allotted risk level include the construction phase as well as the operational phase?	The Coal Authority are best placed to advise on the designation of high-risk areas. Our assessments have considered these designated and assessed the likely risk arising from the proposal (during both construction and operation).
6.4.5	The area overall is seeing an increase in rainfall and associated landslides due to global warming which makes this development, especially concerning in a village that already has a well-known issue with flooding.	The assessment has considered the effects of climate change over time, see ES appendix 3.3.
6.4.6	Will glint and glare be an issue for other stakeholders such as aircraft and local wildlife?	Glint and glare is assessed in ES appendix 6.4.
7. Landscape and Visual		
7.1.4	The proposed sites (Mynydd Fforchdwm and Mynydd Blaenavon) are in the village of Tonmawr with the turbines on Mynydd Blaenavon in close proximity to residential dwellings. The village of Tonmawr is located on Mynydd Blaenavon. The disruptive construction work would have a major impact on the village with roads having to be widened, a large part of Mynydd Blaenavon mountain being removed to create a new site access road, removal of hedgerows and ancient woodlands, destruction of wildlife, amphibians and reptiles to provide access to both Mynydd Blaenavon and Mynydd Fforch Dwm.	Noted - answers to the topics noted are provided in our responses here and within the application documents.
7.1.5	There is no photo montage of the proposed grid connection and how the Developer proposes to run the overhead power lines through the village.	See FAQ 48.
7.1.10	The local community expressed their concerns in relation to the scale and appearance of the proposed development, especially the three turbines on Mynydd Blaenavon and the magnitude of change in views from locations in Tonmawr and the impact on the community and individual residential dwellings.	Noted.
7.1	Additional viewpoints in the village (as requested by NPTCBC and NRW) should be included in the PAC report. As requested by PEDW and NPTCBC, photomontages of the solar array and the grid connection and their visual impacts, should be included in the PAC report. The grid connection will play a major part on whether this proposal is approved or declined and thus should be included with this application.	The solar array is included within the photomontages and the location of the montages were discussed with third parties. The grid connection is not a part of this proposal, albeit a high level assessment of the possible effects has been undertaken in the ES.
7.2.5	The application contravenes Policy 18 of the Future Wales Act as there will be unacceptable adverse visual impacts on nearby communities and individual dwellings. NPTCBC Local Development Plan seeks to ensure the retention and protection of 'ecologically or visually important natural features such as trees, woodland, hedgerows/ field boundaries, water courses or ponds. This application goes against all the above. In the viewpoint analysis the following have been omitted: Blaenavon Terrace, Pelenna Close, Pelenna House, Tynton Farm, Bryn Bettws, Brynhyfryd House, Bryn Awel, Uwch y Glyn. Cwmafan and Cwm Pelenna (includes sites) - A major significant impact will arise from this development. The PAC report does not give a true reflection of the effect that would arise. A manmade development of this scale would become a prominent and incongruous feature.	Noted - answers to the topics noted are provided in our responses here and within the application documents.

Question from the Representation Action Group		Applicant's response
7.8	Effects on other areas - All the special qualities afforded to other nearby areas and neighbouring communities should also apply to the Pelenna Valley as they do at present - “an intimate sense of community where villages are comparatively safe, friendly, welcoming and retain a spirit of cooperation. Where the health, well-being and mental health is given due precedence.” The aviation lighting will have an unknown effect on their brightness from each of the viewpoints as wind turbines of this magnitude have not been used before. The Developer agrees that no manufacturer guarantees that their aviation lights meet this aspect of the CAA specification and is still an emerging discipline. The heights of these turbines could create radar screen clutter to air traffic control radar. The night time impacts would have an effect on the visual amenity of the area. Mynydd Forch Dwm is a dark sky area. Due to the location of the turbines on Mynydd Blaenavon, Danycoed and Tonmawr Road would experience a ‘blinking effect’ from the aviation lights. Drivers would be distracted on the narrow and winding approach road to the village of Tonmawr by this.	Aviation lighting is assessed in ES Appendix 6.1.
	There would be significant changes to the character of Mynydd Blaenavon from its present state to becoming a renewable energy development. Residential properties would experience significant visual effects and could deem the village an undesirable place to live. The scale of this proposal is not appropriate to the scale and character of its surroundings, especially the size of the wind turbines and the visibility of these machines.	The site is located within a pre-assessed area for wind energy within Future Wales. The pre-assessed areas were modelled based on turbines of up to 250m to tip. The landscape and visual impact of the proposal has been assessed in ES Chapter 7.
8. Noise and Vibration		
8.4.1	The point states that ‘The Development is located north and north-east of the settlement at Tonmawr. Isolated properties can also be found east of Tonmawr including Fforch-dwm Farm on Mynydd Fforch Dwm, which is involved with the Proposed Development. The area north and north-east of the Site has a comparably very low population density with the closest dwellings located more than 3 km away.’ The point however fails to acknowledge that the properties on the other side of the proposed development are much closer, starting at around 800m away and are of a much higher population density. This omission makes the development seem much more favourable on paper and to those who are not aware of the area.	Noted.
Table 8.1	The survey undertaken for Tonmawr Farm is undertaken at Glenview. The property is at a higher elevation and in open space therefore to take the survey point at Glenview would give inaccurate data for this location..	The methodology has been subject to review by Neath Port Talbot Council and held to be appropriate.
8.5.1	The report states ‘The turbine layout of the Proposed Development has been iteratively developed so as to avoid significant operational noise effects, based on a representative candidate turbine mode’. However there is no clear assessment to show how this will be achieved. Please could the details of this point be made clear in the planning application so that the residents can be sure that the developers are doing all that is reasonably possible to reduce the noise level of the development/ operational noise	Noted.
8.5.3	The report states ‘deliveries to the Site would be limited to the hours 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays’ However we have been told a number of times by the Project Manager - Tim Mockridge, that the developers will work outside of the commuting and school run times. Keeping in mind that the two local village schools were closed as the Villages were not deemed as being big enough to keep them, school children have to travel miles to school. However this statement of avoiding busy times has not been translated to the PAC.	The two points noted comply with one another, in that delivery times are limited to the hours noted but we will also liaise with the community to ensure that we do not disrupt commuting and school rush hours.
8.5.3	All construction activities shall adhere to good practice as set out in BS 5228. How will this be ensured? It is known that the proposal will include a large number of subcontractors and not employed staff. The delivery of the Met Tower as part of REG Energy planning submission to NPTCBC was caught on camera with the company speeding rapidly down a narrow residential road on Railway Terrace, breaking very hard as the road narrowed. There was no control or reprimand for this contractor by REG Energy	The Principal Contractor will adopt a series of method statements, alongside the Construction Environmental Management Plan, to ensure the relevant standards and practices are adhered to.
8.6.1	‘generally occur at large distances from the residential properties considered, such that the resulting predicted noise levels would not exceed 45 to 61 dB’ Due to noise being measured on an exponential scale, there is a big difference between 45 and 61 dB and the impact on the residents at 61dB would be significant in a village that listens to the sound of the trees, birds and river as stated in the introduction ‘The noise environment in the surrounding area generally comprises a mix of ‘natural’ and man-made sources. The former includes wind-disturbed vegetation, birds, farm animals and as well as, to varying extent, noise from water courses such as the Pelenna River in particular.’	Noted. The noise assessment, ES chapter 8 and ES appendix 8.1, considered both baseline noise levels and predicted noise levels during both construction and operation.
8.6.2	States ‘will be completed in a very short time’. I would like to know what a short time is, as a short time is a subjective and not informative unit of time.	If approved, detailed programmes of work will be prepared that will add clarity to this point.
8.6.2	States ‘The short-term nature of this activity consequently categorises the impact to be of minor magnitude at most’ This statement is one that does not accurately describe the impact that the activity will have on the community of Tonmawr, Pelenna and Neath. The statement is very favourable to those who a) do not live here and b) will make huge financial profits from the project.	The significance attributed is based on criteria, including BS 5228-1 and the Design Manual for Roads and Bridges, amongst other guidance. The nature of the applicant nor any financial considerations affect this assessment.

Question from the Representation Action Group		Applicant's response
8.6.3	States '60 m of Brynhyfryd House, although this is likely to last less than one month, noise levels between 75 to 85 dB(A) could be created. Some activities such as vibratory ground compaction could also create clearly perceptible levels of vibration at Brynhyfryd House, although not at levels likely to lead to any building damage' Firstly, Brynhyfryd House is a semi-detached with no mention of the property next door. Furthermore I cannot see any reference to a structural survey at Brynhyfryd House and therefore how can any certainty of the impact of the structural integrity be included.	The assessment refers to Brnyhyfred House as the nearest receptor to the proposed works. No structural survey has been undertaken as no works have been approved yet.
8.6.3	85dB is at the Upper Action Exposure Limit. It mentions some reference to mitigation measures but they are not included. <u>Will this involve the occupants wearing ear defenders?</u>	Paragraph 8.7.1 outlines the mitigation measures proposed.
8.6.4	States 'However, HGV traffic on Fforch-dwm Road is predicted to result in levels of up to 60 dB at properties along this route, which corresponds to a minor impact magnitude.'	Noted.
	When the gardens are alongside the road (not behind the houses) the noise levels and the emissions from the significant increase will be of a serious impact to the residents and the fact this is considered in the report questions the health, safety and wellbeing of residents that live in the location of the project.	Noise impacts have been assessed in ES chapter 8 and ES appendix 8.1
8.6.6	States 'The effect of traffic on other existing roads was assessed using the CRTN methodology, where possible. A maximum increase of 1.6 dB in the day-time average noise level was predicted on Ton-Mawr Road. Based on the criteria set out in the DMRB, this predicted short term change in traffic noise levels corresponds to a minor impact. For the other roads considered, the predicted increase was of less than 0.5 dB which corresponds to a negligible impact' Where were these taken?	The other roads assessed are noted in Table 8 of ES appendix 8.1.
8.6.9	8.6.9 Predictions of operational wind turbine noise for the Proposed Development in isolation at the assessment locations are detailed in Table 9 of Appendix 8.1. These vary between 22-28 dB(A) at low wind speeds and 34-40 dB(A) at high wind speeds for non-involved properties. What is the predicted night time noise?	Table 14 of ES appendix 8.1 states the difference between noise limits and predicted emissions.
8.6.12	states 'comparison undertaken confirms that predicted cumulative wind turbine noise levels are compliant with the derived noise limits at all assessment locations. Therefore, wind turbine noise from the Proposed Development can remain within the ETSU-R-97 noise limits, and the effect is therefore considered to be Not Significant in EIA terms' Whilst it may be compliant, is there not a duty to lower the noise as far as reasonably practicable as there would be in a H&S assessment. E.g. Using the hierarchy of control, shouldn't Naturalis be looking to Eliminate, Remove & Reduce the noise level further than what is 'compliant' as a duty of care to those who live near and will be affected by the turbines. What is in place to lower these limits?	The limits are used as a control mechanism, so to ensure significant adverse effects do not occur. Where possible, further noise reductions will be implemented.
8.7.1	It is considered feasible to reduce construction noise levels at Brynhyfryd House through measures such as in particular temporary solid screening close to the property boundary. This could reduce noise levels by 10 dB or more if sufficiently high to screen the track construction activities. To screen the property sufficiently due to elevation of the track to the house, you would be losing a significant amount of light to the property	Due to the location of the property, orientation and topography, the proposed mitigation (if required) would not impact the property's right to light.
8.11.1	States' Due to the short-term and localised nature of the construction activities required with the future route, any temporary noise created during construction is likely to be minimal and concentrated in small areas at any one time as the contractor's progress along the course of the route. The construction activities can also be managed in a similar way as described for the Proposed Development in Section 8.5 by restriction on hours of work and good practice measures' However as stated in the technical statement, the topography of the land, and the way it can amplify noise will mean that whilst noise is localised it will be amplified, affecting more than the area stated. Furthermore the restriction of working hours listed do not look very restricted to those who live in the village.	Noted.
9. Ecology		
9.1.	The 7km destruction for the cabling route is a significant part of this proposal and shouldn't be omitted from the plan.	See FAQ 48.
9.1.7	With references made to consultation feedback - Despite numerous conversations with the developers there is little consideration given to our concerns or local knowledge. E.g. with regards to locations of Wales Priority species (Under 57) or with regards to land instability. None of these land instability issues are addressed in the PAC. Is there a reason for this?	The PAC process is a formal mechanism to obtain feedback from specialist and community consultees, including on matters such as ecology. Where relevant and not previously identified, these issues will be integrated into the final submission.
9.4	From the table statement - However, works associated with the grid connection will be minimally invasive and temporary, and subject to good practice mitigation measures, and so any impacts will be highly localised and short-term. How can the statement be justified if the route for cabling is not known? For example one of the planned cabling routes runs over a current NPTCBC proposed LNR, locally known as 'the line', the habitat has been noted by the NPTCBC as significant enough to be included in the LBAP and become protected under an LNR similar to Bryn coal tip.	As per the above, a high level assessment of the grid connection corridor has been undertaken in the ES. Full details and assessment of the grid connection will be subject to a separate application.
9.4	Felling of trees with bat roosts - Naturalis have stated no felling of trees with potential bat roosts at the site but have omitted the significant destruction of bat habitat when widening Fforch Dwm Road.	No trees are proposed to be felled as part of the application.

Question from the Representation Action Group		Applicant's response
9.4	A desk study has been carried out to inform the assessment - Due to significant uniqueness of the area, all consultees should be in attendance and visit the area not just be subject to desk studies.	Desk studies and site surveys have been undertaken where required.
9.4	States 'No narrow green infrastructure corridors will be affected by the Proposed Development. Proposals within the OHMP will serve to provide additional green infrastructure and improve habitat connectivity around the Proposed Development in the longer term' The destruction of nursery habitat in the form of a natural gutter and the widening of Fforch Dwm road totally contradicts this statement you have made. The disruption of this green corridor will be very significant for a number of Wales Priority species	Noted.
9.4	But not updated for Fforch Dwm Road, where there is a notable adder population. With the NPTCBC biodiversity plan stating it is the best place to see Adder's in the NPT area. Why was this area omitted from the survey? When we have told you as a community the Adder population (amongst other reptiles) is significant along the road. Again contradicting the above statement where you have listened to the community feedback.	Please see FAQ no 14.
9.4	This is incorrect. Water bodies are present within 500m, springs and small nursery ponds. The presence of these water bodies can be seen in NTS figure 2 map.	Noted.
9.4.12	Ecobat tool remains in its infancy and is likely to have a limited data range. Therefore using this tool is not suitable for such a large development. We know the ancient woodland from Fforch Dwm road up to both sites is a significant location for bats to be seen and roost. There are a number located in the homes/farmhouses and barns along the route too.	As noted in 9.3.45, cobat output is therefore regarded as an indicative assessment and to be considered alongside desk study information and professional judgement, rather than conclusive evidence of the importance of a site for bats.
9.4.12	States 'Existing records of protected and notable species obtained from the South East Wales Biodiversity Records Centre (SEWBRcC)'. Whilst SEWBRcC is a good source of information and secondary data, the absence of primary survey work being completed at the noted sites of: Tyle'r Waun, Cwm Blaenpelenna and Tonmawr Mine Water and Treatment works - leaves it open to interpretation of species protection and management long term. Without correct baseline survey data, (primary) data that is supported by SEWBRcC record then I feel the management plan cannot appropriately account for the species that may or may not be lost	Noted.
9.4.27	Two areas of Himalayan balsam were recorded within the Site, as shown on Figure 9.3 as TN1 and TN2. A significant under-reported amount of Himalayan balsam. They also did not pick up the Japanese knotweed located near the site either.	Noted.
9.4.32	States 'With the exception of low potential for foraging badger, no evidence of, or suitable habitat for, any protected terrestrial mammal species was recorded during any of the surveys carried out at the Site' Naturalis have focused on the site of the turbines rather than the whole development area. There are significant amounts of small mammals located in and around the site that will be affected. Looking at the site with such tunnel vision is very concerning.	Noted. The assessment focuses on where impacts may occur i.e. where development is proposed, rather than across the entire site, which is a proportionate and appropriate approach.
9.5.9	States 'Small area of land' What is a small area? Small is subjective and the decision on what is small is open to interpretation. The disturbance of the river may not affect the SINC but will affect the Salmon, Sewin and Eel and other species that the angling club and NRW have been working hard to get back to the river.	The applicant has engaged with NRW on any potential impacts to any habitats or species present. The term small is used as the precise area is yet to be defined but regard should be had to ES figure 4.12.
9.6.6.	States 'Adopting a precautionary approach, it is assumed that an area equivalent to the surface area of the solar array would be lost as a result of the Proposed Development. Due to the mounted nature of panels installed, actual direct habitat losses would be considerably less, but the approach considers habitat loss as a result of habitat deteriorations due to shading. The habitat WILL be lost, surely it cannot be precautionary when you have stated the solar farm will be mounted on 11 hectares of concrete?	The solar array will not include 11 hectares of concrete, hence the content of the statement noted.
9.6.16	States 'Providing the implementation of appropriate mitigation measures provisioned for as part of the Proposed Development, reptile and amphibian species are considered unlikely to be subject to significant effects as a result of wind farm developments' Except as previously stated you are going to be destroying one of NPTCBC best known Adder population habitats?	Please see FAQ no 14.
9.6.19	States 'additional water bodies identified considered separate from the development'. Why does the permanent destruction of a 2 mile nursery habitat that is full of amphibians and reptile habitat not count as significant? Is this because it will be destroyed to make the construction route not for the site? The omission of the significant habitat loss that will be on the Fforch Dwm road to make the proposal sound more favourable has not gone unnoticed. Furthermore to say this in a temporary effect 'the construction' route isn't true as you will not return the road to 2.1m and reinstate the natural construction once the build is complete. You have stated that the road will stay in situ for at least 40 years (but likely indefinitely)	Please see FAQ no 14.
9.6.22	'Invertebrates' Given the importance of a whole ecosystem approaches, how is only a high level desktop study able to provide you with the baseline that will allow you to 'mitigate' for habitat loss?	The paragraph noted, along with the rest of the chapter and supporting appendices and figures, evidences the approach and conclusion adopted.
9.6.32	States 'No potential bat roosting habitat will be affected by the Proposed Development, with no direct effects upon roosting bats'. Incorrect - A highly significant increase in traffic alongside bat habitat is very likely to disturb them	The following paragraphs to the one noted provides clarification on this point.

Question from the Representation Action Group		Applicant's response
9.9.1	States 'Increased rainfall'. In this section you note that increased rainfall can impact vegetation and there will be an increase in rainfall due to climate change. But this isn't noted in the flooding section (8) where it is thought that flooding will not be a problem? Yet removing 11 hectares of vegetation for the foundation of the solar array will not lead to runoff and flooding.	Climate change is considered throughout the ES. As noted above the solar array will not include 11 hectares of concrete.
9.9 Table	Is there not more up-to-date data than 2008?	The table has regard to other applications and the data used therein.
9.9	Y Bryn - If Consented will a cumulative effects survey be completed? Shouldn't a cumulative effects impact report not be scoped anyway?	Y Bryn is included in table 9.9
9.9	It is noted the comparison with local wind turbines, whilst may have some data benefit, the turbines are significantly smaller and will not have red aviation lights on them?	The size of other turbines and any lighting is considered within other chapters of the ES.
Appendix	There are no reference photos of along Fforch Dwm road – no survey photos showing the ancient woodland, or the nursery natural gutter habitat.	Noted.
Appendix	From the data it is clear that the survey of reptiles were undertaken on sub optimal days with high level cloud cover. Why not choose days where the sun is shining or least some of the days to be sunshine days?	Please see FAQ no 14.
Figure	Reviewing the survey plan no reptile surveys were undertaken on Fforch Dwm road. An area of significant reptile and amphibian population that Naturalis will be permanently destroying. When Tim Mockridge was asked in the consultation why they hadn't been undertaken there and he said they had.	Please see FAQ no 14.
	Reptile survey plan. They do not seem to be present in the PAC so if they could be provided that would be useful.	Noted.
10. Ornithology		
10.3.4	All bird species are protected in the UK under the Countryside and Wildlife Act 1981. Quoting passerines as 'not significant' should be withdrawn from the report. Tonmawr is abundant in bird species and many raptors that inhabit the village, prey on passerines. The very presence of the passerines within the development area will then bring the raptors within danger from collision with the turbines. Even with very limited and accurate data from bird surveys (only 1 year on Mynydd Blaenavon), Naturalis are admitting to 15 Red Listed bird species being recorded during the surveys.	Noted.
10.3.16	Birds have already been displaced from the Pen y Cymoedd wind farm site. This has had a massive impact on ground nesting birds such as Skylark and Nightjar that were once plentiful in the area. Mynydd Blaenavon is probably the last habitat left for Skylarks in Tonmawr. The proposed development will mean destruction of their habitat and the probable loss of this species in the village.	The application includes a cumulative assessment, which notes Pen y Cymoedd.
10.3.23	Only Red Kites were recorded in sufficient numbers to warrant collision risk mortality modelling. This statement must be contested. Tonmawr has one of the biggest populations of Common Buzzard in the NPTCBC area. Sightings of Buzzard are far more common in the village than Red Kite. Given the UK population of Red Kite quoted by the RSPB is 4,400 pairs and Common Buzzards are quoted as up to 87,500 pairs, one would expect to see more Buzzards than Red Kite. This means there are almost 20 times more Buzzards in the UK than Red Kite, and this fact would be more in line with local sightings.	The scope of surveys undertaken was informed through proximity to designate sites, existing knowledge of sensitive species and with regard to NatureScot guidance (2017 and 2018). The results of the surveys reflect the sighting made during the surveys.
10.3.24	<i>"A significant effect does not necessarily equate to an effect so severe that consent for the project should be refused planning permission. For example many projects with significant negative ecological effects have been lawfully permitted following EIA procedures."</i> This is a disgraceful statement. Naturalis obviously recognise the significant effect on bird species and are almost appealing to the Welsh Government to allow them to destroy our wildlife	The Statement reflects the balance which the decision maker will have to consider.

Question from the Representation Action Group		Applicant's response
10.3.36	Table 10.4 states that only 1 year of Ornithology surveying has been conducted on Mynydd Blaenavon. This is totally unacceptable as Mynydd Blaenavon is a unique bird habitat. It houses a very diverse selection of bird species that include: Raptors such as Goshawk, Hen Harriers, Marsh Harrier, Hobby, Red Kite, Sparrow Hawk, Merlin, Common Buzzard, Peregrine Falcon, Kestrel, Barn Owl and Tawny Owl. Other species recorded, include: Crossbill, Marsh Warbler, Skylark, Tree Pipit, Meadow Pipit, Nightjar, Linnet, Cuckoo, Yellow Hammer, Lesser Spotted Woodpecker, House Sparrow, Tree Sparrow, Song Thrush, Mistle Thrush, Starling, Wren and Dunnock. Table 10.4 states the 'Western land of Mynydd Blaenavon as shown in Figures 10.3 and 10.4) is of relatively limited ornithology value'. This statement shows a lack of local knowledge as this area accommodates many smaller species, such as: Meadow Pipits which are prey for some raptors. For these reasons, further and MORE ACCURATE surveys should be considered mandatory for Mynydd Blaenavon. Table 10.4 states section 7 species were considered. At least 12 of the above mentioned bird species are present on section 7 and 5 reptile species are also on the list. Table 10.4 states Appendix 10.1 is deemed Confidential. This suggests the information contained is highly sensitive. If the information is so sensitive, surely, no development should take place in order to protect wildlife. Table 10.4 states the 'solar farm array component is regarded as part of the Proposed Development in its entirety'. The Solar Array will be sited on Mynydd Blaenavon which has only had 1 year of bird survey conducted. The area for the Solar Array is also the last stronghold for nesting Skylark as this species has already been displaced from the nearby Pen y Cymoedd wind farm, which is currently the biggest in England and Wales. This species will have nowhere else left to nest if this development is approved due to the lack of suitable habitat. Table 10.4 states NRW and NPTCBC have been consulted and have confirmed that justification will need to be provided in the assessment into why one year of ornithology is considered sufficient. Naturalis even admit in their report that raptors such as Red Kite, do not always return to the same nest that was used during the previous season, but sometimes return to the nest site in subsequent years. This alone should justify more than 1 year of field survey is required on Mynydd Blaenavon.	In the absence of Welsh-specific guidance, ornithology surveys have been undertaken in accordance with NatureScot guidance (SNH, 2017) guidance. This guidance considers that winter walkover surveys (particularly for migratory waterfowl; geese/swans) need only be considered in instances where the Site lies within known goose feeding areas (which is specific to Scotland), or where the Site is located within the core foraging distance of the SPAs for these species (taken from NatureScot guidance; SNH, 2016), or other major roosts, unless it can be established from existing data that the area is not utilised for feeding. The Site is not located within the core foraging distance of such SPA (nor were any major roost sites identified from the baseline gathering). Furthermore, the habitats present within the Site and the undulating topography of the Site (and habitats surrounding the Site – principally commercial forestry) are identified as unsuitable to support aggregations of wetland birds, like migratory geese and swans. As such, specific winter walkover surveys were not undertaken. Vantage Point flight activity surveys did however cover the winter period, when target species activity (which included wetland species) through Site was recorded. Subsequently surveys have been undertaken in accordance with best-practice guidance.
	Table 10.4 PEDW states 'wind farms should not have an unacceptable adverse impact on the environment'. This development will have an adverse effect in terms of: · Visual impact on the landscape. · Safety concerns to the community due to waterway alterations on mountains. · Carbon absorption properties of peat. · Carbon release back into the atmosphere due to removal of peat. · Water retention properties of peat. · Hydrology changes to local ecosystems due to removal of peat. · Habitat loss to Birds, Reptiles and Amphibians within the site and along access routes. · The health and mental wellbeing of residents. · Traffic pollution due to only one road in and one road out of the village. The whole of section 10 is based on Desk Studies, Assumptions and Limitations. The section lacks local knowledge of current Ornithology in the area and is not concurrent with independent studies. This is hardly surprising when only 1 year of bird survey has been conducted on Mynydd Blaenavon, which probably has the most diverse species of birds in Tonmawr.	Please see response above in respect of justification of bird surveys undertaken to date.
10.3.38	All habitats will have been available but as with the most common species of birds, particularly raptors, were not considered. This is evident from the lack of consideration to habitat loss for ground nesting such as Meadow Pipit and Skylark caused by the Solar Array.	Noted.
10.4.9	Naturalis are attempting to convince stakeholders that a 1 year bird survey on Mynydd Blaenavon is justified. Mynydd Blaenavon has a far more diverse portfolio of birds than Mynydd Fforch Dwm, so how can they justify using data from 2015 and 2016 for this area?	Please see response above in respect of justification of bird surveys undertaken to date.
10.4.13	Only evidence from Mynydd Fforch Dwm is presented here. Again it appears Mynydd Blaenavon is an afterthought as no data for Nightjar is presented, even though they are more abundant in this area.	Please see response above in respect of justification of bird surveys undertaken to date.

Question from the Representation Action Group		Applicant's response
	Annex 1 Bird Surveys The surveys conducted appear to go totally against local knowledge and the findings, unbelievable. Figure 10.2 throws doubt to the accuracy of these surveys as all bird species seem to avoid the Mynydd Fforch Dwm and Mynydd Blaenavon areas where the turbines are to be sited. Also, it is evident from the map that no bird species have been recorded around the turbines of the Pen Y Cymoedd site. This very much suggests that birds have been displaced and contradicts Naturalis' Desk Study that states species are not displaced by wind turbines. Mynydd Blaenavon does not show any recordings of Meadow Pipit, yet the lower slopes and plateau area (peat bog) are densely populated with this species. Furthermore, the number of recordings of raptors by population cannot be accurate. No Common Buzzards were recorded at either site but they are by far the most common raptor in Tonmawr. The RSPB states there are up to 87,500 pairs of Buzzards in the UK but only 4,400 pairs of Red Kite. Unbelievably, multiple sightings of Red Kite were recorded but none for Buzzards that outnumber Red Kite by almost 20 to 1. Residents have recently started photographing raptors around Tonmawr and it's no surprise that the most photographed raptor in the village is the Common Buzzard. So far, nobody has managed to photograph a Hen Harrier as there are only approximately 545 pairs in the UK. This makes it even more incredible that Naturalis have recorded multiple sightings of this species within the site, but again, none of the Common Buzzard.	Figure 10.2 identifies surveys and records that were available prior to any surveys undertaken by the applicant.
10.5	There is very little consideration given to Mynydd Blaenavon in this section and the area is obviously an afterthought and add-on to this proposal. There seems to be very little knowledge of the area, which is hardly surprising, given the fact that only 1 year of bird survey has been conducted.	Please see response above in respect of justification of bird surveys undertaken to date.
10.5.11	<i>'All wild birds in the UK are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to intentionally or recklessly kill, injure or take any wild bird or take, damage or destroy the nest (whilst being built or in use) or its eggs. In addition, all wild birds listed on Schedule 1 of the Act (including red kite) receive additional legal protection which makes it an offence to intentionally or recklessly disturb these species while building a nest or are using or near a nest containing eggs or young; or to disturb their dependent young'.</i> <i>Naturalis have already stated in numerous sections that they will kill Red Kites due to collision with wind turbines. They have also stated that passerines are insignificant/low value to the development site. By doing so, they are admitting to committing an offence under Section 1 of the Wildlife and Countryside Act 1981.</i>	Noted.
10.5.14	Disturbing nesting birds contravenes Section 1 of the Wildlife and Countryside Act 1981. This is clearly a case of 'build at all cost' no matter what the consequences are to wildlife.	The applicant has not and does not propose to contravene the Wildlife and Countryside Act 1981, nor any other relevant legislation.
10.6	The whole of this section is an attempt to justify the killing of birds due to collision with wind turbines. For once, the figures quoted for Red Kite appear accurate but their increase in numbers is no reason to kill them. Again, Naturalis have been very selective in the species they've identified for collision analysis. As previously mentioned, Common Buzzards outnumber Red Kite by almost 20:1. Therefore, if Buzzards were correctly chosen as the most common raptor in Tonmawr, the kill ratio would be far higher. Again, there is very little evidence of knowledge of the Mynydd Blaenavon site.	Section 10.6 identifies the potential effects of the proposed development on ornithological interests.
10.6.15	<i>'During construction of the Proposed Development, noise and visual disturbance could lead to the temporary displacement or disruption of breeding and foraging birds. The magnitude of effect would be dependent on the timing, the extent of displacement, species affected and availability of alternative suitable habitats within the Site's locality'.</i> Again, disturbing nesting birds contravenes Section 1 of the Wildlife and Countryside Act 1981. In the case of Mynydd Blaenavon, there are no alternative suitable habitats as the development will take over the entire upper reaches of the mountain. This is no justification whatsoever and exhibits a lack of knowledge of the local area. Clearly another case of a Desk Study rather than Field Study knowledge.	The applicant proposes to undertake good practice protocols, included as part of the Construction Environment Management Plan to ensure legislative compliance for breeding birds, amongst other requirements.
10.6.21	This is a very concerning statement by the developer and shows a total disregard for bird species, and in particular, Red Kite. Under the Wildlife and Countryside Act 1981, the population of any bird species should be reduced by zero due to this development. Trying to justify reducing the Red Kite population of West Glamorgan by 2.13% borders on a criminal act and should be prohibited by the Welsh Government.	The paragraph starts with "...taking a precautionary worst-case scenario approach that the construction works for the Proposed Development could displace the red kite pair from the Study Area due to proximity of working areas to the Site...". This frames the rest of the paragraph and the possible effects alongside context for any impact.
10.7.1	<i>'There are no significant adverse effects predicted for any important ornithological receptor'.</i> Another worrying comment and it shows the developer's disregard for Ornithology. They just don't want to acknowledge that all birds are protected under the Wildlife and Countryside Act 1981 in the UK. No other mitigations other than Assumptions, Limitations and Good Practices will be applied which is frankly appalling.	The methodology used to inform the assessment is noted earlier on in the chapter, section 10.3, and has been undertaken in line with CIEEM guidelines.
10.11.3	<i>'Although the grid connection could result in some small-scale temporary habitat loss and disturbance of birds, it is envisaged that the effects on ornithology, with good practice measures adopted, will be Short-term'.</i> Again, this comment should be deemed an offence and the only mitigation offered is good practices. It is not good practice to destroy wildlife habitat!	The assessment of the grid corridor is high level, in line with DNS requirements and the noted EIA regulations.
	Appendix 10.2	

Question from the Representation Action Group		Applicant's response
2.4.1	'Survey effort (hours) completed at each VP location between March 2019 and February 2020, and March 2021 and February 2022, is summarised in Table 2.3 (note VP1 at MFD was surveyed across the entire two-year survey period, while VP2 was surveyed at MB in Year 2 only)'. The surveys are only for 81 hours per year on MFD and only 180 hours for 1 year only on MB. This equates to less than 7 hours of data per month. Furthermore, Table 2.5 shows daily recordings ranging from only 1 hour 15 minutes of recording.	Noted.
2.5.7	'At collision risk' flight activity recorded during the survey period for red kite which were analysed using the NatureScot CRM (Band et al., 200) is summarised in Table 2.4. Analysis was undertaken for both Year 1 and Year 2 for MFD and in Year 2 for MB'. Table 2.4 shows almost 27% more flight activity on Mynydd Blaenavon compared to Mynydd Fforch Dwm. Surely, this should necessitate more data needs to be collected rather than mere 1 year of data currently held.	As noted previously, in the absence of Welsh-specific guidance, ornithology surveys have been undertaken in accordance with NatureScot guidance (SNH, 2017) guidance. This guidance considers that winter walkover surveys (particularly for migratory waterfowl; geese/swans) need only be considered in instances where the Site lies within known goose feeding areas (which is specific to Scotland), or where the Site is located within the core foraging distance of the SPAs for these species (taken from NatureScot guidance; SNH, 2016), or other major roosts, unless it can be established from existing data that the area is not utilised for feeding. The Site is not located within the core foraging distance of such SPA (nor were any major roost sites identified from the baseline gathering). Furthermore, the habitats present within the Site and the undulating topography of the Site (and habitats surrounding the Site – principally commercial forestry) are identified as unsuitable to support aggregations of wetland birds, like migratory geese and swans. As such, specific winter walkover surveys were not undertaken. Vantage Point flight activity surveys did however cover the winter period, when target species activity (which included wetland species) through Site was recorded. Subsequently surveys have been undertaken in accordance with best-practice guidance.
	2.6 Target Species Parameters It's astonishing to find that only Red Kites have been identified as target species. At the time of writing, the RSPB quotes the population of the Common Buzzard to be up to 87,500 Pairs. This compares to 4,400 pairs of Red Kites or 19.88 times more Buzzards. Buzzards are by far the most common raptor in Tonmawr and if the parameters used in Table 3.1 were applied to a Common Buzzard, the 'Years for One Death' figures would be 0.21 years or every 11 weeks.	The collision rates are worked out based on flight activity of target species in the vicinity of the proposed turbines. As discussed at the exhibition day, there are certain (rare) species which are considered 'target species'. The principal guidance if you wanted to read it is NatureScot guidance, which is adopted in Wales, given there is no Welsh-specific guidance, and target species are defined: https://www.nature.scot/sites/default/files/2018-06/Guidance%20Note%20-%20Recommended%20bird%20survey%20methods%20to%20inform%20impact%20assessment%20of%20onshore%20windfarms.pdf Those non-target 'common' species (like buzzard) are not considered to be significantly impacted by wind farms, and so although we record the number seen of buzzard and other non-target species during surveys we do not specifically map their flight activity like we do for target species like hen harrier & merlin which are afforded a higher level of legislative protection (and are rarer) and are considered more sensitive to developments such as wind farms. We thus concentrate more of our efforts on those (target) species likely to be most affected by the scheme. This is why we do not assess effects specifically on common buzzard, and it would not just be a case of extrapolating the criteria for red kite to buzzard as it would depend on how much flight activity is in the vicinity of the proposed development (which will differ between the species).
	Also, the figures provided in Table 3.1: 'CRM Analysis results', appear to contradict those in Table 2.4: "At collision risk" flight activity – 'Total Time at Collision Risk Height (secs) as Derived from CRM Analysis (secs)' shows more time in flight for Year 2 MB than MFD in Table 2.4. This does not appear to be the case in Table 3.1 as it shows completely the opposite.	The tables are showing 2 different things. Table 2.4 is the time for red kite birds to be at-risk for collision while Table 3.1 are the results of the collision risk modelling showing the overall 'annual' collision rates. The two areas (MB & MFD) have had to be treated a little differently for analysis given the size of proposed turbines in each area differ in height and this meant recording all flights which pass into 290m from proposed turbines in the MB area as at-risk from collision (which is highly precautionary) and for MFD area it's flights at height bands 2&3 at-risk (height band 1 isn't) – this is explained in section 2.5 of the report (Appendix 10.2). The at-risk area in MB area is thus larger than the equivalent in the MFD area, so although there are a few more at-risk flights at MB area, there is a much greater area being regarded as at-risk in the MB area than MFD area (height band 1 is at-risk at MB area but not MFD area due to different proposed turbine specification) which has likely resulted in the apparent contradiction you state between the 2 tables. To get overall 'annual' collision estimate we've then combined the collision rates for the 2 areas, as stated in section 3.1 (paragraph 3.1.6), so we've regarded and tallied the collision rates for both areas regardless of which has the higher rate (essentially it doesn't matter which area has higher rate, it's the combined proposed wind farm wide total that we have regarded in the assessment). For more information on CRM this is the main guidance: https://www.bto.org/sites/default/files/u28/downloads/Projects/Final_Report_SOSS02_Band1ModelGuidance.pdf
	_ANNEX 2 – COLLISION PROBABILITY CALCULATIONS The data shown for the dimensions of the Red Kite differ to those given by the RSPB. For example, the wingspan quoted by the Developer is 1.65m, whereas the RSPB quotes up to 1.95m.	Noted.

Question from the Representation Action Group		Applicant's response
	General Observations Appendix 9.4 Throughout Chapter 10, many references have been made to Appendix 9.4. This has led to even more concerns about this development.	Noted.
	4.2 Aim 1: Enhancement of Moorland Habitats	
4.2.1	<i>'The Tyle'r Waum SINC includes blanket bog as a main qualifying feature. Blanket bog is a priority habitat listed on Section 7 of the Environment (Wales) Act 2011'. Again, there is no mention of the peat bog on Mynydd Blaenavon as this site appears to be an afterthought with little data collected.</i>	Figure 9.1b shows the ecological non-statutory designated sites - which does not include any sites on Mynydd Blaenavon.
4.2.4	<i>Excess peat excavated for the Proposed Development elsewhere within the Site will be relocated into the Tyle'r Waum SINC to further enhance peatland habitat within this management area.</i> The peat bog on Mynydd Blaenavon will be largely destroyed to produce the 'excess peat' to restore Tyle'r Waun. Due to the recognised importance of peat bogs in fighting climate change, the question has to be asked: Why not restore Tyle'r Waun and preserve Mynydd Blaenavon	Queries relating to peat are noted in the following section.
	4.3 Aim 2: Enhance Habitat for Reptiles and Amphibians	
4.3.1	<i>The Tyle'r Waum SINC includes adder and common lizard as qualifying features, with common lizard and adder recorded within the Site during baseline information gathering (see Appendix 9.2). Adder and common lizard are both priority species listed on Section 7 of the Environment (Wales) Act 2016.</i> The developer's acknowledge protection of Reptiles and Amphibians. However, no consideration has been given to the destruction of the second largest Reptile and Amphibian habitat in the village. The water channel and retaining wall running along Fforch Dwm road is home to Newts, Frogs, Toads, Lizards, Adders, Grass Snakes and Slow Worms. However, the developer intends to destroy this habitat to widen Fforch Dwm road to enable access for construction vehicles. No Reptile or Amphibian surveys have been conducted along this route!	The applicant does not propose to destroy any habitats or species. Any enhancement to Fforch Dwm road would be undertaken with an Ecological Clerk of Works present to monitor for the presence of any habitats and species that could be affected by the works proposed.
	4.6 Aim 5: Enhancement of Opportunities for Nesting and Foraging Birds	
4.6.3	<i>'The bog enhancement and restoration detailed as Aim 1 would benefit ground-nesting species'.</i> Yet again, no consideration has been given to Mynydd Blaenavon. The lack of information and knowledge on this site should be alarming. The developers are actually taking away opportunities for ground-nesting species at this site by constructing a Solar Array and bases for wind turbines. Due to the size of the neighbouring Pen Y Cymoedd site, there are very few moorland habitats left in Tonmawr. Unfortunately, Mynydd Blaenavon is probably the last one.	Queries relating to peat are noted in the following section.
11. Geology, Hydrology, Hydrogeology and Peat		
11.1.4	Desk studies will help give an outline of the site area. It is impossible to understand the hydrology, ecosystems and habitats of both Mynydd Blaenavon and Mynydd Fforch Dwm in 6 days of walkover surveys. It appears the developers are attempting to rush through this development without giving due care to the environment, local ecosystems, habitats, wildlife or the safety of the people within the community. The spring and summer of 2022 was one of the driest on record with most areas of Wales experienced hose pipe bans. Obviously, the developers did not appreciate the value or water retention properties of the peat at both sites that kept the nearby streams flowing during drought conditions. If they had, they would not be going against Welsh Government policy on peat bog restoration and intend removing it at both sites. If the developers truly wanted to understand the area, they would have visited during the winter months when water flow on both mountains and water discharge from disused mine workings was at its worst.	Regard should be had to the whole chapter, noting the approach; policy context; assessment methodology and alike.
11.1.5	Again, another Desk Study that does not show physical conditions, particularly during winter months!	Noted.
11.3.1	Current Welsh Government policy means there will be no guidelines on the removal of peat as the government, in line with most other countries, have pledged to triple peatland restoration (ref: MS Julie James, 3rd October 2022). The peat on Mynydd Blaenavon sits on top of the mountain and controls water runoff. Without this peat, there is a higher risk of flood water running down the mountain. Similarly, the peat on Mynydd Fforch Dwm is on a sloping site so the same risk of flooding applies. No desk studies can account for these facts!	The applicant notes the Minister's recent and previous statements and policies on peat and other matters in relation to the proposed development and has regard to them throughout the assessment work undertaken to date. In the absence of Welsh policy, the applicant has utilised IEMA guidance.
11.3.14	Table 11.4 does not mention the fact that NPTCBC stated in its response to Naturalis' scoping report (Question 10.4) 'siting turbines in areas of shallow peat is not acceptable and should be avoided totally'.	Table 11.4 is a "Summary of consultation relating to hydrology, hydrogeology, geology and peat.
11.4.16	This statement is incorrect! Shallow peat is considered to be less than 0.5m as described in section 11.6.21 of this report.	Noted. The definition of shallow peat has been subject to discussion with third parties, noting the lack of Welsh policy on the matter noted previously.
11.4.17	This statement is incorrect and due to the fact that peat is such a valuable commodity in the fight against climate change, it should not be removed or disturbed. Wales' land mass consists of 4% peat bogs but they hold 30% of our carbon.	The sentence referenced states that "soils are considered a high sensitivity receptor".

Question from the Representation Action Group		Applicant's response
11.4.21	Again, Mynydd Blaenavon appears to be a rushed afterthought. Mynydd Fforch Dwm has 12 months (only) of rainfall and water flow data but there is no data for Mynydd Blaenavon. The topography, quantity and depth of peat at both sites are massively different. As stated by the developer, 'Irrigation rates are variable due to the presence of peat'. This means the amount of water being released into streams and groundwater will be varied. Due to this variability, no assumptions should be made as potentially, proposed drainage systems could be overwhelmed giving rise to the risk of flooding.	Data is not available for Blaenavon as NRW do not have a rainfall gauging station at that location. However, given the proximity of the two sites it is considered that rainfall will be the same.
11.4.26	The Coal Authority has been informed (not replied at time of writing) of a concern relating to one of the mine water outlets from Mynydd Blaenavon. The discharge pipe from this outlet was already at 50% capacity after 2 weeks without any rainfall. Naturalis intends altering waterways on Mynydd Blaenavon and residents are concerned that this action could have a catastrophic effect on the discharge of mine water, similar to the flood from a disused mine shaft at Skewen in January 2021.	As noted in the FAQ, All hydrology in the soils and peat around the turbines and tracks will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. This localised management of hydrology and the maintenance of existing regimes will ensure there is no potential for impact on mine water.
11.4.49	Yet again, the developer is relying on Desk Studies instead of local knowledge! Fforch Dwm road is within 2km of the site and the water channel running along Fforch Dwm road is the biggest habitat in Tonmawr for Newts, Frogs and Toads. Also, it is probably the second largest habitat in Tonmawr of Adders, which feed on the Amphibians. Naturalis intends removing this waterway and adjacent retaining wall to widen Fforch Dwm road that will allow access for abnormal load vehicles. Their action will destroy the habitat and kill both the Amphibians and the Reptiles that live there	As noted previously, the applicant does not propose to destroy any habitats or species. Any enhancement to Fforch Dwm road would be undertaken with an Ecological Clerk of Works present to monitor for the presence of any habitats and species that could be affected by the works proposed.
11.5.11	This is a very worrying statement. The access road to Mynydd Blaenavon travels along the length of the village. The access road is in an elevated position above a children's playground and houses. The discharge of runoff downstream could have a major impact on flood risk, damage to properties or even worse!	The sentence notes a possible risk (blockage of the flow pathway) and potential impacts (flood risk) and identifies a solution to address both the risk and potential impact (suitably sized flow conveyance structure, such as a culvert).
11.6.19	The dispersal of water from peat is variable and weather dependent cross track drains cannot mimic the effect our climate has on ecosystems. In fact, we are now witnessing localised flooding for the first time in living memory since the installation of cross track drains on an access road has been built to the Glastir tree planting area of Mynydd Blaenavon. Both Mynydd Blaenavon and Mynydd Fforch Dwm are classed as areas of 'High Risk to Development' by the Coal Authority and have high volumes of mine water discharged from both mountains. Altering waterways could potentially impact the amount of water being discharged.	The proposed cross track drainage will safeguard existing surface water flow pathways on the Site. Queries relating to the Coal Authority's mapping are addressed elsewhere, albeit the applicant wishes to note that the Coal Authority have responded to the PAC stating no objection to the proposed development.
11.6.20	The dispersal of water from peat is variable and weather dependent cross track drains cannot mimic the effect our climate has on ecosystems. No Desk Study can determine the importance of water dispersal and carbon retention of peat. Peat cannot be substituted, especially when it's on top of a mountain!	Please see the question and answer noted above.
11.6.21	The Welsh Government has recognised the importance of peat bogs and now has a policy to triple the amount of peat bog restorations in Wales. The action of removing this peat goes against Welsh Government policy! This is simply a case of the Developers wanting to build at all cost, just to line their own pockets, with no consideration to the environment.	Through consultation with Neath Port Talbot Council and the Lost Peatland project, the applicant is working with them to align the proposed development with their aims and objectives (which align with the Welsh Government). This includes the reuse of excavated peat on existing areas of poor quality and restoring unmanaged area.
11.6.22	The whole purpose in the drive for renewable energy is to reduce our carbon footprint in an attempt to save our planet. Peat bogs are now recognised as a massive asset to the environment as they absorb so much carbon. The action of removing peat will cause the carbon retained in the peat to be released back into the atmosphere. This is not preventing a problem; it will actually cause a problem. Notwithstanding the release of carbon back into the atmosphere, the removal of peat will have a massive impact on local ecosystems. This will have a catastrophic effect on Mynydd Blaenavon. Peat is known to contain 90% water, and on Mynydd Blaenavon, where the peat is on the top of the mountain, the water is slowly and safely dissipated into Nant Blaengwen rwd and surrounding streams. Even during the summer of 2022 when areas of Wales were introducing hose pipe bans, Nant Blaengwen rwd kept flowing as normal. It's a locally known fact that Nant Blaengwen rwd has never stopped flowing, even in cases of severe drought. Removing peat will alter the flow of water and local ecosystems with a potentially disastrous effect. The lack of consideration for wildlife habitats, ecosystems and the welfare of our community are nothing short of environmental vandalism!	Noted. As stated in 11.6.22, carbon calculations have been undertaken at the Site which demonstrates that the removal of peat is offset by the reduction in carbon emissions arising from the renewable energy development.
11.6.31	Mynydd Blaenavon in particular, has many subsurface waterways that exit the mountain into local drainage systems. These drainage systems are already at capacity and altering the runoff patterns could lead to the drainage system becoming overloaded and result in flooding. This is a very generalised comment and not specific to the local area or site. Again, this has been done as part of a Desk Study without local knowledge.	The applicant is conscious of the runoff patterns and has sought to mitigate any changes to these patterns through a surface water drainage strategy, which will ensure that runoff from the site does not increase as a result of the development.
11.6.46	River Pelenna is not a low receptor. The Coal Authority has carried out major work installing Reed Beds to filter oxidised mine water over many years. The project has been a huge success in restoring the water quality of River Pelenna and its tributaries. Now, for the first time in living memory, the river has Salmon present. NRW have recently installed 'fish passes' for this species but the river also houses Trout and Bullhead as well. Altering waterway and flood storage could have an impact on water quality of River Pelenna and its tributaries.	Utilising the methodology, section 11.3, the river Pelenna is a low sensitivity receptor. The applicant is liaising with NRW on further enhancements to this area around the proposed crossing, noting the recent investment that NRW has undertaken in this area with regard to fisheries.

Question from the Representation Action Group		Applicant's response
11.6.48	This is a very worrying statement. It is full of 'limit', 'minimising', 'as far as possible', 'if', 'may', 'where possible' and 'as is practicably possible'. It does not mention prevention! Settlement lagoons and silt fences will require removing more peat and the effect of this has not been accounted for by the developers. They seem to forget that Mynydd Blaenavon is on top of a mountain and Mynydd Fforch Dwm is on a sloping site. In 1966, the spoil tip that caused the Aberfan disaster, demolished houses and a school. A silt fence will not stop a landslide or peat bog slide on top of Mynydd Blaenavon.	Noted.
11.6.33	Excavating a 'large void' for the turbines will require proportionally large volumes of peat to be removed.	As noted in 11.6.21, there are some small and very localised areas of the site where infrastructure will be positioned on areas of peat or peaty soils. Section 4.1 of ES Appendix 11.2 states that the depth of peat in the areas of turbine locations is on average 0.27m, with a range from 0.14m to 0.49m.
11.6.51	The developers don't have a design for their drainage system yet so how can they determine the results of their actions? Stating it is of minor significance suggests it will have an impact on downstream rivers that have been cleaned to the point where they now contain Salmon. Altering drainage courses on top of a mountain already lled with mine water is a disaster waiting to happen. The community will be solely reliant on 'good practice measures' for protecting our safety and our environment	In the reference paragraph, the applicant proposes that the measures noted will mitigate sedimentation impacts on small watercourses. Third parties may disagree with this position.
11.6.57	The whole of section 11.6 is reliant on 'good practice measures' to limit contamination of downstream rivers. This statement admits rivers will be contaminated with little consideration given to fish stocks. Runoff water will disturb what the developers consider as 'poor quality' surface water which will in turn flow into the downstream rivers.	Paragraph 11.6.58 restates the condition of the river Pelenna (poor quality due to previous mining activity) and in paragraph 11.6.59 that any contamination which may occur would be of low concentration so as to have a negligible impact.
11.8.2	Again, the only mitigation given to protect local ecosystems is 'good practice measures'. Local knowledge and physical conditions will determine the outcome of this proposed development, not another Desk Study.	Noted.
11.10.3	There is no mention of water quality monitoring on Mynydd Blaenavon. Mynydd Blaenavon was added to the development after Mynydd Fforch Dwm and hasn't had the same degree of investigation as Mynydd Fforch Dwm. As with the lack of Bird (only 1 year instead of 2 years) and Bat studies at this site, the developers have not given as much consideration to waterways. There are 2 streams on Mynydd Blaenavon as well as numerous sub surface runoffs and mine water outlets. The consequences of the developers actions could have a major impact on Mynydd Blaenavon.	The applicant will review the need to monitor water quality at Mynydd Blaenavon.
11.11.2	Mynydd Blaenavon has recently been planted with Broadleaf and Sitka Spruce trees as part of a Welsh Government grant. The original application was for the planting of 76 hectares. This was reduced by the Welsh government to avoid 'high priority habitat' and 'deep peat'. At best, the recently planted trees will be destroyed by the wind turbines vehicles as they will be using the same area of land as the trees that have been planted. This will be a total loss of taxpayers money. The developers should have contacted the Welsh Government to achieve accurate changes to the site layout instead of NPTCC.	The tree planting has the relevant approval and this application is separate to it. The two do no overlap and there are appropriate buffers between the wind turbines and the proposed planting to ensure no interaction
Non Technical Summary		
3.9	This is a contradictory statement of fact. The developers will actually be carbonising the planet by excavating peat and releasing the absorbed carbon back into the atmosphere. Peat is climate resilient but wind turbines are not! Removing peat from any location is tantamount to environmental vandalism. It is now acknowledged as one of our biggest assets against climate change. Although Peatlands account for only 4% of Wales' land mass it contains 30% of our retained carbon content. As Peatlands are such a rarity in Wales, every effort should be made to retain and restore them. Even removing shallow peat of 0.5m should be avoided as it has already taken 500 years to reach this depth (source: https://www.daera-ni.gov.uk)	The Non-Technical Summary summarises the content of the ES. As such, the queries raised within this Q&A are largely repeated in the following queries.
4.1	There are also nearby air fields at Margam and St Athan as well as Emergency Helicopter centres at Morriston Hospital, Prince Charles Hospital, Merthyr and University Hospital Cardiff. One recent 'mission critical' helicopter flight over Mynydd Fforch Dwm and Mynydd Blaenavon was just at just 1550 ft. This helicopter would have crashed into the turbines more than 100 ft down from the tip height.	See above.
	Fig 11.6 Shows high groundwater vulnerability. Particularly along access routes. In the case of Mynydd Blaenavon, the access route showing high vulnerability runs parallel with the village and just above a children's playground. In the case of Mynydd Fforch Dwm, the access route requires widening Fforch Dwm road by 3 metres and involves cutting into the side of mountains. There is also a Grade 2 CADW listed building sited above this access route that will be in danger of collapse due to the weight and volume of the construction traffic as well as the road widening.	See above.
Technical Appendix 11.1		

Question from the Representation Action Group		Applicant's response
2.2	• Paragraph 5.3.127 <i>Proposals will need to demonstrate that it would not cause any unacceptable impacts to the environment and the amenity of local residents or communities. Particular regard will be given to the potential impact on landscape, nature conservation and wildlife interests of the site and adjoining land, pollution or disturbance to ground or surface water supply or drainage, areas of historical, cultural and archaeological importance, the likely generation of pollution or contamination, flooding and food. Naturalis are breaking all unacceptable impacts mentioned in paragraph 5.3.127.</i>	The Flood Consequences Assessment undertakes the demonstration requested in the text to evidence that the proposed development will not cause any unacceptable impacts.
3.6	This again exhibits lack of local knowledge and is evidence of yet another Desk Study. The author uses 'would expect ' or 'would not expect' three times in this paragraph.	Noted.
4.1.4	This is a very dismissive statement considering Naturalis intends altering the waterway. This may, in turn alter the amount of water entering the many drift mines that are in the development area or along the access routes.	As per the FAQ, All hydrology in the soils and peat will be managed locally in order to maintain habitat around the development, prevent erosion and maintain existing local runoff regimes. Management will include the introduction of sustainable drainage features to ensure that there is no increase in runoff from the site. A surface water drainage plan will be prepared as part of the detailed design (following determination) and will be secured by planning condition as part of the Construction Environmental Management Plan (CEMP)
4.1.5	Again, this paragraph exhibits lack of local knowledge and is evidence of yet another Desk Study by using the words 'we would expect'.	Noted.
	Technical Appendix 11.2	
2.1	This statement is incorrect. It is impossible to physically walk across the peat bog on Mynydd Blaenavon, even during drought conditions of the summer of 2022. Naturalis have a total disregard for peat and are intent on erecting the turbines, irrespective of the damage that will be caused to the environment, ecosystems, wildlife habitats or the wellbeing of residents of the community. Even shallow peat of 0.3m has taken 300 years to develop. Also, stating: <i>'Thin peat was classed as being 0.5m to 1.5m thick, with deposits in excess of this being classed as thick peat'</i> is also incorrect. Thin or shallow peat is considered to be less than 0.5m	Noted.
3.5	Again, Naturalis are considering shallow peat as less than 1.0m instead of 0.5m for access tracks. This could have a massive impact on hydrology and the local ecosystem. Also, in their response to the scoping report NPTCBC, state that building turbines on areas of shallow peat should be 'avoided totally'.	Noted. The definition of shallow peat has been subject to discussion with third parties, noting the lack of Welsh policy on the matter noted previously.
4.3.1	<i>Naturalis state: Over deeper peat (typically >1.0m), floating tracks are used to remove the requirement for peat excavation and limit disruption of hydrological pathways.</i> The developer is admitting that disrupting water pathways will have adverse effects. They are trying to justify removing less peat by quoting deeper peat is that which is over 1.0m. Again, deep peat is considered to be over 0.5m.	Noted. The definition of shallow peat has been subject to discussion with third parties, noting the lack of Welsh policy on the matter noted previously.
4.3.2	Mentions a Factor of Safety (FoS) and regular routine monitoring for loaded areas of excavated peat. No Factor of Safety or monitoring frequencies are provided.	The factor of safety would be determined at the point of excavation. Monitoring frequencies would be set out within the associated method statement, if the proposed development is approved.
4.5.2	Storing of peat, whether long term or short term, will require a greater area of the peat bog to be disturbed. Furthermore, irrigating the stored peat could alter groundwater dispersal and would increase traffic volumes.	The location of any stored peat has not yet been determined so any disturbance to peat is unknown at present. Moreover, any excavated peat is likely to be reused on Site to enhance and restore existing deposits (currently subject to discussion with Neath Port Talbot Council and the Lost Peatlands project).
	Table 5-1 Excavation Materials The previous sections relates to peat storage and stockpiling but the volumes used in this table have been manipulated to show no peat needs to be stockpiled. Even to the point that the figures quoted do not add up to the values shown (although corrected in the Excavated Materials Calculator). Verge restoration of the access roads will have a negligible impact as the water NATURAL runoff from the peat will be dammed by the access road. Also, there is no mention of removal of peat for drainage systems such as the food lagoons. Conveniently, there is no mention of the amount of Carbon that will be released back into the atmosphere when the peat is removed!	Noted. The applicant advises that the access road will not 'dam' any water runoff. As shown in Figure 11.3, whilst there is peat located on the Site, the infrastructure has been designed to avoid deeper areas of peat. As such, not all works will involve the excavation of peat.
6.0	Peat excavation states: <i>'Typically the peat was found to be brous and fairly dry within the top metre before becoming more amorphous with depth'</i> . This statement is incorrect. It is impossible to walk through the Mynydd Blaenavon peat bog, even under drought conditions of summer 2022.	Noted.
	Table 6-1 Excavated Materials – Assessment of Suitability This is obviously another 'cut & paste' exercise. The developers are contradicting their statement in Table 5-1, whereby they state there will be no waste peat. The Table above states they are also requesting approval from SEPA, which proves its 'cut & paste' exercise	Noted.
7.0	Conclusion This Appendix is very poorly written and still contains annotations of errors that need to be corrected. Again, the figures quoted have been manipulated to suit the needs of the developer and are based on assumptions. No Desk Study can mimic physical carbon retention attributes or the water dispersing qualities of the peat. It is critical to realise that the Mynydd Blaenavon site sits on top of a mountain and overlooks the village of Tonmawr below. The access road to Mynydd Blaenavon runs through a field just above a children's playground. This field contains shallow peat. Any alteration to the filtering effect of the peat above could have catastrophic consequences to the village below.	Noted.

Question from the Representation Action Group		Applicant's response
	Technical Appendix 11.3	
2.2	The map of Coal Mining History shown is very basic. The Coal Authority maps of the area are far more detailed and show the TRUE extent of mining in the area and the risk posed to residents. There are numerous drift mines scattered throughout the development area AND access routes.	The Map is OS 1st Edition 1888.
2.3	The statement on Hydrology states that ‘rocks are classified as moderately permeable, which seldom produce large quantities of water’ is not accurate. The amount of contaminated mine water being dispelled from disused mine workings, has led to the Coal Authority installing Reed Beds to filter this water before it is fed into downstream rivers. There are two major Reed bed sites in Tonmawr. One below Mynydd Fforch Dwm and one below Mynydd Blaenavon, such is the volume of discharge from both mountains	The sentence referenced includes "...are important for local supplies and in supplying base flows to rivers".
3.2.1	There have been a number of landslides locally in recent years. Probably, the most significant was when a spoil tip slipped into the river Pelenna on 13th January 1983 and permanently altered the course of the river due to the amount of material deposited.	Noted.
4.0	Conclusion - Appendix A There have been a number of landslides locally in recent years. Probably, the most significant was when a spoil tip slipped into the river Pelenna on 13th January 1983 and permanently altered the course of the river due to the amount of material deposited.	Noted.
	Technical Appendix 11.4	
1.0	This is approved by the Scottish Government NOT the Welsh Government. The Welsh Government have recently pledged to triple Peatland restoration projects in Wales (Climate Minister, Julie James, 3rd October 2022), recognising the importance of peat and the role it plays in counteracting climate change. Quoting Scottish Peatlands is totally irrelevant to mountaintop peatlands in Wales and appears to be another ‘cut & paste’ exercise by the developer, in an attempt to bolster their report. This project if approved would have an adverse effect on climate change by removing peat from peat bogs. This introduction also states: ‘A development of seven turbines with an individual output of 5.5MW are proposed with an estimated total capacity of 38.5MW’.	The Welsh Government do not have a carbon calculator and, as such, the Scottish Government's tool has been used.
	These figures are higher than quoted for this planning application. The figures quoted in the application are for 7 turbines with 5 MW output and a capacity of 35MW. Naturalis also state: • An estimate of the total volume of concrete has been included, based on an anticipated 900m3 concrete being required for each foundation with additional provision for building foundations associated with the control building and substation. This would require 788 concrete lorries for the foundations alone. As Tonmawr only has ‘one road in and one road out’, this would mean 1,576 passes of concrete lorries through the village. In addition to this, extra concrete is required for the Solar Array bases, control buildings and substation. Further to the amount of concrete lorries, additional vehicles will be required to transport products such as steel reinforcement, hardcore and associated building materials. These vehicles will have to pass through a small village and very close to residential properties. The increase in traffic volumes and Abnormal Loads of 72 tonne, will pose a massive health risk to the community in terms of noise, fumes and mental wellbeing. The volume and weight of the traffic could also cause damage to properties, some of which are ex-miners cottages with shallow footings or are on ‘built up’ ground. The increase in traffic will also result in the death of much more wildlife. With only two residential properties on Fforch Dwm road and relatively low traffic volumes, on average, there are still 2 Adders killed by traffic each year. Again, the developer has not conducted a reptile study on Fforch Dwm road.	The application seeks consent for the physical infrastructure not the MW generated, which could increase or decrease (albeit the applicant notes the legislative limits on energy generation). The other questions noted here are asked and answered in other parts of this response.
	General Observations: 1. The Coal Authority classifies the area as ‘high Risk to Development’. However, Naturalis conveniently estimates the area as ‘Low Risk’. Whilst Naturalis estimate the location of the turbines to be low risk, they have not given any due consideration to the surrounding area or access routes. For example, Fforch Dwm road has a number of mine entrances that are close to the road. The drainage channel on the North side of the road even has exposed tramways that traverse underneath the road. Naturalis intends widening this road by 3 metres which entail removing the drainage channel and retaining wall and will encroach perilously closer to the mine entrances. There is no mention of this in the developer’s application. Also, removing the drainage channel and retaining wall will destroy the second largest habitat of Frogs, Newts, Toads and Adders in Tonmawr. Again, there is no mention of this in their application as they didn’t conduct any surveys on Fforch Dwm road.	These questions have been asked and answered in other parts of this response.

Question from the Representation Action Group		Applicant's response
	2. The developer has been very selective in what they enter into the report. The access road to the Mynydd Fforch Dwm site passes directly above the entrance to Garth Colliery and has a vent shaft and tower for the colliery along its route. This structure is a CADW grade 2 listed building. Naturalis have said they intend widening this road by 3 metres, which will then pass just 17 metres below the buildings and 38 metres from the visible structure of the vent shaft that is seen above ground. Although mentioned in the report, there is no consideration given to preserve this structure. This is a glaring omission from protecting our heritage, especially when the developer has the knowledge that Abnormal Loads of 72 tonnes will pass below the structure.	These questions have been asked and answered in other parts of this response.
	3. The report is poorly constructed, contains many duplications, inaccuracies and is very contradictory. The sections relating to peat are clearly 'cut & paste' exercises. The report sections are filled with stockpiling, short term storage, drainage systems, lagoons and irrigation for varieties of stored peat. However, the Appendices sections state there will be no 'waste' as the peat will be mostly used on road verges. Even using the peat on verges to visually enhance the road, will still prevent the peat from performing its function of naturally dispersing water to local ecosystems when it is needed. Concrete bases and drainage systems cannot perform this function. Altering natural waterways on top of a mountain that feeds into mine water below them could have disastrous consequences, similar to the one at Skewen (NPCBC) in January 2021.	These questions have been asked and answered in other parts of this response.
	4. The report and Appendices fail to mention shallow peat along the access road leading to Mynydd Blaenavon. This access road runs parallel with the village and just above a playground opposite Johns Terrace. The surface water runoff from the side of this mountain exits in the form of localised temporary streams. Any alterations to these waterways could result in flooding to the village below. Again, there is no consideration given to these dangers in the Developers application.	These questions have been asked and answered in other parts of this response.
	5. The entire report is based on Desk Studies, limitations and assumptions. Many of the sections appear to be 'cut & paste' exercises that relate to other wind farm developments. The report exhibits very little local knowledge of actual conditions. This is evident from 'old studies' that are mostly mis-positioned and skew the results in a favourable outcome for the developer.	These questions have been asked and answered in other parts of this response.
12. Archaeology and Cultural Heritage		
12.3.1	Based on the site's topography and the significant size of this development in proximity to the Village a 1km area is small.	Noted.
12.3.4	The cabling route, as stated by PEDW in the scoping report should be part of this application, as the cumulative damage of 7/9 km of cabling route should be considered as part of an overall planning consent.	A grid connection corridor has been provided in ES Figure 4.14 and a high level assessment of this corridor has been undertaken. Full details and assessment will be undertaken in a separate application.
12.3.7	Who was present at this site inspection?	The site inspection was undertaken by an appropriately competent and qualified professional.
12.6.5	Would almost certainly impact the scheduled monument, due to proximity of the encroaching road widening and the vibration from the significant increase in plant/construction heavy haulage vehicles.	Impacts to the heritage assets have been assessed.
12.6.6	There is a railway, but also a tramway. The tramway is still visible on Fforch Dwm road and a large part of the village's heritage but seems to have been missed from this report. Has the tramway been considered in addition to the railway?	Regard is had to the tramway in ES appendix 12.1.
12.6.15	What is a floating road? How will this ensure the monument is protected? How will you ensure that during the installation of this road it isn't affected?	A floating road in its simplest form is a road that is constructed directly on top of the ground relying on the strength of the in-situ ground for its support. The road does not actually "float" on the ground rather an equilibrium builds up between the weight of the road and the in situ strength of the ground whereby the combined system comes into balance.
12.6.16	When would this not be possible? What engineering considerations would deem a floating road not to be possible? What are the mitigations then?	If approved, further site investigations would indicate the extent of mitigation and the engineering solution required.
12.7.3	What would be considered a non-physical effect?	Non-physical effects relate to any change to an assets setting.
Table 12.4	To state that there is no residual effect with the mitigation is being very sure/naive in the structures built in old mining communities. It should at least state that there is still a minor significance based on the probability that even before the installation the traffic increase could impact the stack.	The methodology used to inform the assessment utilises Cadw's Conservation Principles (2021).
13. Transport and Access		
13.2.1	Rhondda Cynon Taf LDP(2006-2021). Rhondda Cynon Taf Supplementary Planning Guidance. south East Wales Valleys LTP (2015). These documents bear no relevance to the proposed route and access, so why have they been included in the PAC report?	Noted.

Question from the Representation Action Group		Applicant's response
13.3.5	To accommodate the new access junctions, significant work would have to be carried out on rural roads not designed to accommodate the volume and weight of the proposed vehicles. The Route Survey is predominantly a desktop study. How can you propose using public roads without first carrying out a dummy run? NPTCBC have advised that this should be done. As advised by NPTCBC policy for wind farms, they recommend that planning permission IS NOT DETERMINED until such time as a transport management plan for the access route to the site has been agreed with the Highway Authority. NPTCBC insist on a dummy run being held as agreed with the Highway Authority. How can this planning application progress without a dummy run taking place? As raised by WG Network Management Division (20/5/22) what were the errors in the proposed condition wording? Repeated requests from NPTCBC for a dummy run have been refused. If the developer is confident of the access route, why won't they agree to a dummy run? Fforch Dwm Road is used daily by local people and visitors to the area for cycling and recreation, enhancing their mental health and well-being from being outdoors and enjoying the countryside. This development will deny people from using Forch Dwm Road. The ATC data collection sites do not give accurate figures as the data capture was wrongly positioned on Forch Dwm Road and are stated as having taken place between 24-30 November 2021. The ATC baseline 24 average traffic data table is 2022? The Adventure Holiday Park is still at the planning stage and not yet constructed so should not be included as an assumption. There is mention throughout the sensitivity summary that the roads in	In consultation with Neath Port Talbot Council, the applicant has agreed to a trial run (which would take place if the application is approved). A Transport Management Plan has been prepared - see Appendix 13.1. We have also engaged with Welsh Government's highway department on the wording of any condition they consider appropriate on any approved application. The applicant is undertaking additional road traffic surveys to validate the data obtained. Wildfox adventure resort in the Afan Valley has been approved by Neath Port Talbot Council and is considered in the cumulative assessment.
13.7.2	Tonmawr are minor rural roads not constructed to accommodate frequent use by HGV's. Our village roads cannot sustain the weight of these heavy construction vehicles and abnormal loads. To access the Fforch Dwm site the vehicles would have to drive through Railway Terrace, former railway workers' cottages which have no foundations, with their front access directly on the pavement. Sky dishes and hanging baskets would have to be removed from properties. Residents would be trapped in their homes when these abnormal loads try to inch their way through. The construction programme is assumed to take 12 months. This estimation is guesswork and will inevitably take longer with weather conditions and excavation problems. You are over simplifying the increase in traffic, noise and pollution. We will encounter this disruption for a longer period than 12 months. The increase in 'normal traffic' is not normal for our rural and mainly single track roads, together with the AIL loads for the turbines and the high capacity cranes that our road network will be unable to cope with. The figures in the traffic generation profile over the 12 month period - are those figures solely on entering the sites? Do the figures include the return journeys? There is the assumption that staff are likely to be based locally. How was that assumption made? The estimations and assumptions on the total trips during the construction phase are incorrect as they are not factual. The base readings for Tonmawr are grossly overestimated. The total traffic movement will, as you state in the report, increase significantly. All site traffic will have to travel through our village and the stats will be the same as the site access figures. This increase in traffic will cause a significant rise in pollution levels. We disagree that there will be no capacity road issues as Tonmawr is a 'one road in, one road out, village. How did you collect the data on the receptors affected for the Potential Construction Phase Effects Summary as they are considered significant? The summary should be based on 12 months not solely on Month 5. The construction TMP has not been agreed with NPTCBC prior to construction works commencing as no trial run has taken place.	In discussion with Neath Port Talbot Council, the applicant has agreed to pre- and post-construction surveys to ensure that the road infrastructure is maintained, if not enhanced. Methods for vehicle movements have been considered and a management procedure proposed in the Transport Management Plan, see Appendix 13.1. Noise and vibration are assessed in ES chapter 9. The ES, both Chapter 9 and its appendices, has assessed the impact on the traffic network proposed to be utilised by the proposal. Regard is had to month 5 as this is when the highest quantum of vehicle movements are expected. The TMP will be agreed with Neath Port Talbot Council, and other parties, if the application is approved.
	The public roads, prior to construction, are not fit for purpose for HGV vehicles (size and weight). During the construction phase our roads will be a health and safety danger for pedestrians and cyclists alike. Users of PROW's will no longer enjoy the freedom of countryside walks at these sites as they do now. The narrow rural roads between. Impact and Tonmawr are regularly used by horse riders and by riders from the nearby equestrian centre. The operation phase effects on Mynydd Blaenavon are unknown due to peat destruction, alteration of the water table and the 'runoff' effects it will have on our village. The UK Climate Projections (UKCP18) show a general trend to wetter winters thus leading to a greater risk of flooding. This will have a major impact on the changes proposed to Mynydd Blaenavon. Summary. The proposed access route from the Port at Swansea to the sites at Tonmawr should never have been considered. There are alternative routes that could be used. During ALL transportation, the road network would be totally closed with the major impact between Cimla and Tonmawr. This is a major health and safety issue. What is the time period for the loss of services i.e. power, broadband, water etc for the residents of Tonmawr by the dropping of overhead lines?	As agreed with Neath Port Talbot Council, the applicant will undertake pre- and post-construction surveys of the road network and the applicant will maintain and enhance the road network, should any damage occur. The proposed development will not lead to the stopping up or diversion of any Public Rights of Way. Effects relating to peat are expanded upon in response to chapter 11 of the ES in this response. UK climate projects have been integrated into the assessment work undertaken. The applicant will manage road movements to ensure minimal disruption to road users, residents and other parties affected.

Question from the Representation Action Group		Applicant's response
Appendix	Traffic generation profile estimates over 3000 movements in all months 1-5, peaking at Month 5 then dropping to around 1000 movements in month 6-8. • Peak traffic during construction phase (particularly month 5) with 170 movements per day including 143 HGVs. A Percentage increase on Tonmawr road for HGVs is 62% - this is incorrect as the base data is flawed. Driver delay across all of the receptor sites and impact on residents of Tonmawr and Efail Fach are classified as minor - on what basis is this, with 170 movements per day; this is incorrect as the base data is flawed. Severance for Users of Tonmawr road are classified as moderate whereas driver delay is classified as minor. This doesn't correlate- this is incorrect as the base data is flawed. The classifications in Table 13.9 represent the effects during construction phase only which is short lived. These are not anticipated during the operational period; this is incorrect as the base data is flawed	The applicant is undertaken additional baseline traffic surveys to validate the data obtained and used in this assessment. The methodology, including the significance attributed to any effects, is set out in the relevant chapters.
14. Socio-Economic Effects		
14.2.1	In total the onshore industry represents 5,500 jobs in the UK, of which 600 are in Wales. This is less than 10% of the overall jobs in the UK. How many jobs will this project create for locals and will they be long term? If not what benefit will locals have from all the disruption this project will cause during its lifespan. This project will bring little employment opportunities to local residents both in the short or long term of the project. It even states in the initial scoping report that local jobs won't be possible.	The modelling within the ES indicates that the wider UK will see 14 direct and 7 indirect full time employment job years over the three year development. Of these, Wales will see 7 direct and 3 indirect full time employment created or safeguarded and the local area will benefit from 1 job and 0.3 jobs direct over the three year development. This creates 21 full time employment jobs in the wider UK, 9 full time employment jobs in Wales and 1.6 full time employment job years for the local area, as per table 14.3 of the ES, with a medium positive effect.
14.2.2	The WG net zero carbon budget commitment to reduce carbon emissions by an average of 37% by 2025 includes the commitment to continue to consent to the construction of onshore wind turbines. Do they consider the actual site and if the destruction of Peatlands is required when granting consent? It seems counterproductive to build turbines in an area which is already contributing to reducing carbon emissions. Surely there are other areas these onshore wind turbines can be constructed that will add to the reduction of carbon emissions not reducing it.	The Welsh Government has identified a series of pre-assessed areas for wind energy, within which the Site is located. The Welsh Government has a series of commitments and policies and the application has assessed all impacts arising from the proposed development, both positive and negative.
14.2.3	WG commitment to reach net zero by 2050, in which wind power is fundamental in achieving should not be at the expense of other commitments re Health and Wellbeing or environmental. There is no evidence at the moment on how these wind turbines can affect the people who live within the communities that these wind farms are being constructed.	The Welsh Government is currently consulting on bringing forward its targets for renewable energy generation to have 100% renewable energy generation for Wales' domestic energy demands. The Welsh Government will have regard to the Future of Well-being Generations Act (Wales) 2015 as part of any decision it makes on this application.
14.2.4	Future Wales - How many renewable energy projects have at least one element of local ownership which was the target set by 2020? If people cannot afford to invest in the local ownership how does it benefit them?	The Welsh Government's 'Energy Generation in Wales 2021' shows that Wales has achieved nearly 90% of its target of at least 1GW of renewable energy capacity to be locally owned by 2030.
14.2.5	How does the Mynydd Fforch Dwm development align with three of the legislation's wellbeing goals of prosperity, resilience and global responsibility? What wider social and economic benefits have the potential to cover all seven wellbeing goals? Before this project has even got on the ground, it is already causing stress, worry and confusion for the local residents and people of the wider community, so how would this be addressed by the construction of the wind farm?	In making any decision, the Minister will have regard to the Well-being of Future Generations Act (Wales) 2015. The applicant considers the benefits of the proposed development align with the three well-being goals noted. This position is corroborated by previous decisions by the Minister on other renewable energy projects in Wales.
14.2.6	What social benefits would be brought to the area? Local ownership would not be an option for the majority of residents as they would be required to invest and community investment would be through a grants application scheme, which has no guarantee the community will get anything from.	The applicant is open to discussions with anyone about the community benefit fund.
14.2.7	In the LDP it references two wind Energy Strategic Search Areas identified by WG which have potential to be utilised as onshore wind farm sites. How were these identified?	The LDP refers to Strategic Search Areas which have since been replaced by Pre-assessed areas for wind energy.
14.2.8	Is there no mention of solar array in this suitability?	Solar arrays are considered to be part of the energy generation mix when reference is made to renewable energy production.
14.2.9	How can the installations of MFD be expected to fit within the policy environmental and environment goals - surely they should.	The applicant's submission provides evidence and justification that the proposed development satisfies environmental policies and goals.
14.2.10	What robust information has been gathered to support the economic impact assessment?	Section 14.4 sets out the baseline conditions in respect of socio-economics.
14.3.3	Extensive desktop studies have been done for the socio-economic impact assessment; this seems to be a theme throughout this process.	Noted.
14.3.6	The use of data on tourism and visitor numbers used in this study is not relevant to this project as the area is used mainly by locals.	The applicant has assessed the impact of the proposed development on a range of economic indicators, including tourism and recreation.
14.3.12	If the area is classed as a designated site of importance for nature conservation why is this project being considered at all as there will be adverse effects to land, birds and animals.	Impacts to ornithology are responded to elsewhere in this response.
14.4.3 to 14.4.6	Data taken is from the Neath Port Talbot area and not specific to the areas of Tonmawr and Pontrhydyfen where unemployment, education and deprivation may be slightly different.	The data referred to is not available at the level to which the respondent requests.
14.4.7	According to the data Neath Port Talbot has 14 LSOA's (Lower Super Output Area) which are in the 10% most deprived. This project will not contribute to any improvement on these figures.	Noted. The proposed development has a number of positive impacts.
14.4.9	An increase in employment is frequently highlighted in the literature as the main benefit of wind energy developments and expanding the renewable energy sector in general. This will not apply to the MFD project as it has been stated in the scoping report no local jobs will be created.	See the response above on the jobs created (and table 14.3 of the ES).

Question from the Representation Action Group		Applicant's response
14.5.3 14.5.4 and 14.5.5	The gures in these paragraphs of what could be bene ted locally is a lower end scenario of 9%. The anticipated gures of 158k Paragraph 14.5.3, 74k paragraph 14.5.4 and 14k paragraph 14.5.5 seems very poor return for locals who will have to endure the disruption while the construction phase is carried out and the unknown problems that might occur when the turbines are in place and running.	Table 14.7 of the ES identifies that GVA effects are considered to be medium positive or high positive, with a total of £4.9 million direct and indirect GVA effects.
14.5.6	Both these paragraphs relate to jobs indirect and direct but from information elsewhere these jobs will not be created for local people. The magnitude of project shows on table 14.3 as low How much has been retained to Wales currently? A number of the consultees, the Ecologist, the Transport Manager, the VI designer, none resided in Wales. When staying in Wales for Consultation recently, the team stayed at the Premier inn, not local hotels.	See the response above on the jobs created (and table 14.3 of the ES).
14.5.8	The expected cost to build MFD wind farm is expected to cost £43.75m but according to the information only 5% of that will be expected to be retained locally again this gure seems poor for the potential problems that could be incurred for local residents.	Noted.
14.5.11	These paragraphs discuss jobs and we know through the information in the scoping report these jobs will not be local and possibly limited for the wider area.	See the response above on the jobs created (and table 14.3 of the ES).
14.5.13	The information in the operational phase is as the construction and development phase information. Limited bene t both nancially and employment creation for the local area.	As noted previously, table 14.7 of the ES identifies that GVA effects are considered to be medium positive or high positive, with a total of £4.9 million direct and indirect GVA effects.
14.5.22 to	The bene ts for the community through community funds will have to be assessed and applied for through grants, this will be available to all a ected areas even though some will have less disruption and have no negative impact of the proposed wind farm. The expected gure of 175K per annum for a community fund would be very limited for the area if a big project was required i.e building of a new community centre as the current facility is a temporary structure which is over the lifespan it was originally designed for	The applicant is open to discussions with anyone about the community benefit fund.
14.5.27 to	Tourism in the vicinity of the proposed wind farm site is very limited and the site is mainly used by locals. The developments planned by NPT in these paragraphs have no bearing on the relevance to the proposed site.	The application has had regard to other schemes to consider any cumulative effects that the proposed development may have with other projects.
14.5.34	How much disruption is expected to be caused to the public right of way during construction?	The proposed development will not stop up or divert any public rights of way. Instead, if approved the proposed development may lead to the enhancement of condition and quality of these routes. During construction some of the public rights of way may be temporarily diverted for reasons of health and safety due to proximity to construction activities.
14.5.35	How much disruption is expected with the solar development and the bene ts for the community. Little information has been given for this development.	The solar array will not require abnormal indivisible loads to transport the infrastructure. The solar array will also have benefits via a community benefit fund, if approved.
14.5.35	Unforeseen wider impacts are likely - can this be expanded upon?	As the text suggests, other wider impacts may arise as a result of the proposed development.
14.5.37	Bene ts for the local community - what skills bene ts are expected and would these be for locals ?	The applicant is open to discussion how benefits, including training, could be delivered for locals.
14.6.1	Construction phase - the statement of communicating with communities regarding access to the site is awed as several questions that have been raised regarding the proposed route are yet to be unanswered.	The applican has committed to early and ongoing consultation with interested parties.
14.6.2	Operational phase - no impact of signi cance to be considered. What about increased tra c to the area?	Impacts relating to traffic are considered within the relevant chapter of the ES.
14.7.1	Residual e ects construction phase - negative impacts will not be short lived as there will be visual implication ie access roads where there are now green elds.	Impacts relating to landscape and visual are considered within the relevant chapter of the ES.
14.10.2	Table 14.7 summary of socio economic impact of development of Mynydd Fforch Dwm This table shows all positive impact but this is based on poor evidence collected and collated via desktop studies. The 80 local jobs created or safeguarded is debatable as in other studies it is stated no local jobs will be created.	Noted.
15. Summary of Mitigation, Residual and Interaction Effects		
15.2.6	Brynhfryd house is a semi-detached property; there is no mention of the adjoining house indicating poor ground studies. The document states that it will focus on reducing noise, but it expects noise will reach 85 db which is above the upper action exposure limits based on the Control of noise regulation 2005. The noise is expected to be present for a few months as the road is constructed which is unacceptable. In a workplace it would be expected that ear defenders are worn. The topography of the valley also means that the noise for the construction site will be ampli ed across the valley. We know this to be true as when events are held on the odd occasion at Bryn Bettws Lodge on the other side of the Valley, the sound clearly travels and I don't think this has been taken into account in the study. Stating they will be temporary minor residual e ects is a gross underestimation in this PAC	The assessment refers to Brnyhyfred House as the nearest receptor to the proposed works. No structural survey has been undertaken as no works have been approved yet.
15.2.9	States that 'Measures to mitigate e ects on ecology have been designed into the scheme as inherent design mitigation measures' Yet large areas of the construction route haven't been surveyed and therefore the mitigation cannot be designed or included.	The extent of adequacy of surveys is considered to be appropriate and has been reviewed by both Neath Port Talbot Council and NRW.
15.2.9	A reasonable avoidance measure would be to change the access route where the inherent risks are far greater than the bene t of the turbines and solar array.	The application documents have assessed the project as proposed.
15.2.13	The prediction that there will be no signi cant adverse e ects predicted for any important ornithological species is based on poor data collection where the number of raptor species and their population density is grossly underestimated.	Noted. Ornithology queries have been addressed previously.
15.2.14	What are the good practice measures that would be implemented?	The Outline Construction Environmental Management Plan includes details of good practice measures.

Question from the Representation Action Group		Applicant's response
15.2.26	To state that it is not considered likely to result in significant effects is once again just glazing over the reality hoping PEDW will accept it. The truth being bringing turbines through the town of Neath, the suburb of Cimla and Tonmawr will cause absolute chaos, destruction and infrastructure damage. There is also a reasonable risk to life. If this is an accepted risk by the Welsh Government then so be it, but to say that with the management plan will mean it isn't a significant disruption is either naivety or stupidity	The applicant has engaged with the Welsh Government highways department and Neath Port Talbot Council in relation to transport matters. The Transport Management Plan within Appendix 13.1 includes measures to reduce and manage any risk that may arise.
Table 15.3	The table lists actions by Applicant, developer and contractor. What is the difference between the applicant and the developer?	Noted. For the purpose of table 15.3 there is no difference between the applicant and the developer.
Draft Planning, Design and Access Statements		
	Executive Summary	
	The suggested benefits of the Proposed Development does not outweigh any adverse impact. The destruction of peatland at Mynydd Blaenavon goes against the Biodiversity Deep Dive which will have a major adverse effect on the ecosystem of Blaenavon Mountain, the wildlife and the protected species of birds that live there.	Where required, any excavated peat will be reused on Site and used to enhance and restore other habitats. We continue to engage with Neath Port Talbot Council and the Lost Peatlands project on this matter.
2.	The Site and its Surrounds.	
2.1.1	The site is located directly in the village of Tonmawr and not on the outskirts as the report suggests. All construction materials and components will have to be transported through the village, rural roads in the village. This will cause major disruption to the daily lives of the residents of Tonmawr and the connecting areas of Efail Fach, Cimla and the town of Neath.	Noted.
2.1.6	The impact to the landscape is not found to be capable of accommodating this development. We disagree with the Developers interpretation of Policy 17 and Policy 18 of the Future Wales Plan 2040.	Noted.
	The Proposed Development. The area has not been pre assessed for a solar array.	Noted.
	Wind Turbine Foundations. The peat destruction to allow for these foundations will be irreversible, as will the construction of the crane pads and wind turbine lay down areas Solar Array, switch gear and control buildings, cabling, switching station, access tracks, entrance and turning points, 5.9km of new track to the proposed development: by removing the existing peat to accommodate the construction of the above, will cause unknown major problems with the water table which could have a disastrous flooding effect on the village in the future.	Where required, any excavated peat will be reused on Site and used to enhance and restore other habitats. We continue to engage with Neath Port Talbot Council and the Lost Peatlands project on this matter.
	Grid Connection. This should be included in the application, as stated in the Scoping Report.	See FAQ 48.
	Planning History Mynydd Blaenavon is a separate site to Pen Y Cymoedd and any data obtained from the Pen Y Cymoedd planning application bears no relevance to Mynydd Blaenavon.	Pen y Cymoedd and other wind farms are adjacent to the Site and are relevant as cumulative developments.
3.4	Environmental Impact Assessment Limited data capture has been used for Mynydd Blaenavon. The Developers describe the significant adverse effects that will be caused by the Proposed Development. Any mitigation measures will not reduce these adverse effects.	A proportionate assessment has been undertaken and where required mitigation measures proposed to reduce adverse effects.
3.4	Brief and Vision. We strongly contest the guiding principle of the Proposed Development. It is not of an appropriate size and has an adverse effect on the character of the local landscape (especially the turbines to be located on Blaenavon Mountain). You can't generate renewables at the expense of the environment you are trying to protect.	The site is within a pre-assessed area for wind energy within Future Wales which was modelled using turbines of 250m to tip. Notwithstanding this, we have fully assessed the impacts of the proposal in the ES.
3.4	Over 95 per cent of local residents are strongly opposed to the design approach.	Please refer to the Consultation Report and PAC report that will be submitted with the application.
3.4	Interpretation. Site Characteristics. The development area for the proposal is a desktop study. The development area consists of two sites - Mynydd Fforch Dwm and Mynydd Blaenavon that are completely different in character and location. Mynydd Blaenavon is in the village with the majority of the residential properties located on the mountainside.	Noted.
3.4	Interpretation. Site Characteristics. All the turbines on Mynydd Blaenavon will be sited in peat, as well as the road structures, the hard standing for cranes, turning circles, solar array and anything else planned for that mountain will not avoid the peat - peat that has taken hundreds of years to evolve	ES Figure 4.4 overlays the proposal onto the areas surveyed for peat.

Question from the Representation Action Group		Applicant's response
3.4	Hydrological Flows. The Wind Farm infrastructure will have a MAJOR effect which will alter runoff and local hydrology. The dangers of these consequences are unknown. At the public consultation event on 18.1.23, the hydrology expert agreed that long term effects are unknown. You will be destroying parts of ancient woodland to gain access to the site.	Question relating to hydrology have been addressed above.
3.4	Surrounding Characteristics. The scale and close proximity of the wind turbines will have an overpowering visual effect on the village. Micro siting will not avoid the peat. The proposed layout plan was a desk top study and did not take into account the close proximity of the village. All above objectives can be challenged and classed as major impacts and significance. Switching Station. The absence of a grid connection route at this stage in the application is not acceptable and it should be submitted as one application.	Visual impacts have been assessed in the ES, as have impacts on peat. The proposed layout plan has considered several material considerations which influenced its design. Queries relating to the grid connection have been addressed previously.
4.5.2	Site Access. The destruction and disruption that will be caused to the roads, habitat, access to the countryside, the effect on resident wealth and well-being to gain access to the site will be a major impact. There are alternative routes to the site using NRW land.	If approved, pre-construction surveys of the roads will be undertaken so to ensure that they are returned to the same, if not enhanced, state following construction works. The additional traffic movements will be managed, as noted in ES appendix 13.1, to minimise adverse effects on residents and other users of the roads.
4.5.2	Construction. The new tracks and access roads proposed for Mynydd Blaenavon will again have unknown effects on the water table which will cause 'run-off' into the village from the mound.	Hydrological impacts have been assessed in the ES.
4.5.2	Accessibility. The statement on access for members of the public is contradictory and discriminatory against people with disabilities.	Noted.
4.5.2	Movement Fforch Dwm road is used daily by walkers, cyclists, families and dog walkers but should this proposal go ahead, they will be denied access to the countryside they now enjoy on health and safety grounds. This is the only available road to Fforch Dwm.	The proposed development will not stop up or divert any public rights of way. Instead, if approved the proposed development may lead to the enhancement of condition and quality of these routes. During construction some of the public rights of way may be temporarily diverted for reasons of health and safety due to proximity to construction activities.
4.5.2	Environmental Sustainability The land that is proposed to be used for this development is rich in peat, and is the habitat for reptiles, wildlife and many protected species of birds and should remain protected for generations to come. The proposed site is not capable of accommodating the development in an acceptable way as has been explained previously.	Noted and responses to the queries raised previously have been responded to.
4.5.2	Community Safety The significant increase in the volume of traffic predicted to travel through the village will be a major safety issue to drivers, pedestrians and children in the village.	The CEMP and associated method statements to be produced and used by the Principal Contractor will manage the additional traffic in an acceptable manner.
4.5.2	Summary The proposed development is largely assessed from desktop studies. The design process has not been informed by consultation with the local community who are opposed to this application.	Noted.
5.	Legislative Policy Review Well-being of Future Generations Act (Wales) Act 2015: the well-being goals of this act should apply to the village of Tonmawr and we should not be deprived of all the policies towards a better Wales just by living near a pre-assessed area.	Noted.
	Town and Country Planning Act (EIA) (Wales) Regs 2017. This proposed development goes against the principles of this Act. Everything that is proposed for this development is contrary to the aims of the Welsh Government, Neath Port Talbot County Borough Council and local planning for the protection of peat lands, biodiversity, habitat and the health and well-being of residents.	The noted act transposes the EU framework into Welsh law - which sets out how Environmental Impact Assessment should be undertaken. The proposal has had regard to the aims of the Welsh Government and Neath Port Talbot Council in preparing this application, as well as that of local residents and other matters, as addressed in the ES.
6.1.2	Future Wales also includes a number of other criteria that this development contradicts. E.g. Criteria on an Equal Wales, Healthier Wales etc. Where is this addressed in the report?	Amongst other policy considerations, the Planning Statement addresses each of the criteria noted in policy 18 in respect of large scale renewable energy projects.
6.2.1	Yes there is a declared climate emergency as such you cannot be digging up irreplaceable ancient woodland and peat even if you are going to be producing low carbon energy.	The national and local declaration of a climate emergency is important context to the need for schemes such as this.
	Can you provide information on the ancient woodland destruction?	No works are proposed to woodland.
6.2.3	Where has this information been taken from?	The targets and carbon budgets approved by Senedd Cymru in March 2021.
6.2.6	Power 26,800 homes or provide power to 26,680 homes? What are the calculations for this? It has stated in Chapter 14 that Wales' job creation from the development as a percentage is very low.	The text states "...provide enough renewable energy to power 26,680 homes". This is based on a 31.64% capacity factor (DUKES, 2021) and average household consumption of 3,748 kWh (BEIS, 2021).
6.2.7	Does this take into account the destruction of Peat and Ancient woodland? Does this consider the fossil fuel release from diesel plant lorries? Does this include the boat fuel?	The calculator factors in the peat, emissions, wind farm foundations, access tracks and other infrastructure as part of its assessment.

Question from the Representation Action Group		Applicant's response
6.2.8	Is there more information available? How much would it be to invest in this wind farm? What will the predicted returns be based on schemes similar (given the comparison with other schemes throughout the PAC I assume there will be another scheme similar)	The applicant is open to discussions with anyone about the community benefit fund.
6.2.9	There is no evidence in the report that the development will have ecological benefits on existing habitats? Rather there will be a significant negative impact e.g. the ground nesting birds use this area as mitigation habitat displaced from Pen y Cymoedd. The skylarks have been significantly reduced at Pen Y Cymoedd. Once this landscape is interrupted and destroyed then there will be nowhere else for these birds to go in the area. Destroying this area is similar to the Wetlands in Newport, which was created as mitigation for the Cardi Barrage. It will have a significant effect. The Socio-economic effect is biased and will possibly be neutral at best, with most arguing it will have a negative impact. It has been noted no schools have been considered in this PAC, despite there being a likely significant disruption directly to 2 schools and directly 7 schools.	Policy 9 of Future Wales requires projects to include biodiversity net benefit. As such, the project has sought to avoid, minimise, restore, offset any adverse impacts. In consultation with Neath Port Talbot Council and the Lost Peatland project, the proposal also seeks to enhance existing habitats and species on site, focused on the two nearby SINCs - further details are provided in the ES Appendix 9.4.
Table 2	These turbines are significantly larger, and closer to property. They tower over the village and will also need to be lit at night for aviation compliance. Like dragons whirling, towering over the village at night, they will cause visual annoyance at best.	Unsure which part of section 2 this refers to.
Table 2	When will the OHMP be created?	See ES appendix 9.4
Table 2	What about the lime kiln?	Unsure which part of section 2 this refers to.
Table 2	What about EE? They are the local network.	The applicant has engaged with the the telecoms provider and mitigation is in the process of being agreed.
Table 2	What is the carbon footprint of this tra	Unsure which part of section 2 this refers to.
Table 3	Will noise be reduced as far as possible not just to compliance level?	The limits are used as a control mechanism, so to ensure significant adverse effects do not occur. Where possible, further noise reductions will be implemented.
Table 4	An increase of 170 + vehicles a day to a small, steep sided Village will have a significant negative impact on air pollution. Why has no baseline monitoring been done despite it being raised in the CC meeting?	If approved, we would expect air quality monitoring to be a condition that we would have to monitor and stay beneath statutory limits.
Table 4	More details about the traffic plan is needed to see what the proposals are for safe transport. What mitigation will be included in this plan?	ES Appendix 13.1 provides the details and proposed mitigation noted.
	So far the only evidence of transport is poor driving of subcontractors for the Met tower (video evidenced) and poor inconsiderate driving by the developer, refusing to reverse 5m and causing a resident to reverse over 100m. (1st consultation event July)	Noted.
6.5.1	I think this would be disputed by most residents in the locality and that this a favourable statement for those benefiting financially from the project, wellbeing, cultural, social, economic habitat will all be negatively affected by the development, despite the chapter 14 which tries to gloss over the problems.	Noted.
7.1.1	It is not 1 km North of Tonmawr, it is IN TONMAWR, IN THE VILLAGE. Tonmawr is built into Mynydd Blaenavon	Noted.
7.1.2	As stated previously there are a number of omissions in this report, which try and sway the report in Naturalis' favour. This development doesn't have significant positive benefits. It has an overall significant negative impact on the local residents and people of Wales.	Noted.
Collaborative Benefits Report		
1.1.2	Who is the parent company?	The applicant is Mynydd Forch Dwm Wind Energy2021 Limited.
	What benefits and opportunities can this project provide for the community of Pelenna?	The applicant is open to discussions with anyone about the community benefit fund.
2.2.1	Capacity of 45MW, however the given community fund is based on 37MW.	The community fund includes a value per MW for wind farm energy and value per MW for solar energy. The application seeks permission for physical infrastructure, not the MW output. If approved, the community benefit fund will be based on the MW output at the point of construction.
2.2.2	Why is the grid connection not included in the proposed development plan?	See FAQ 48.
3.2.1	If approved, the MFD wind farm and solar array would help meet the WG net-zero targets whilst also avoiding the emission of increased carbon dioxide levels during the operational phases. No mention of how much carbon emissions would be created during the construction phase. The area in question for the proposed wind farm has little if any carbondioxide levels at present due to being mainly farmland.	Carbon emissions during construction are factored into the carbon calculator in ES Appendix 11.4.
3.2.2	It is clear this is a gross underestimation based on the number of vehicle movements, concrete, habitat construction. Either the calculation module is biased or the figures are incorrect. What is the breakdown of this calculation and what is included in the figures.	Carbon emissions during construction are factored into the carbon calculator in ES Appendix 11.4.
3.6.11	Why does the administration fee come out of the community benefit fund? Not the colossal profits made by Naturalis?	The applicant is open to discussions with anyone about the community benefit fund.
4.2.4	MFD facebook page has 2 likes and 3 followers?	Noted.
	Concluding statement In conclusion, the construction of renewable energy technologies should not be built at the expense of the things we are trying to protect. This development will destroy irreplaceable habitats, damage housing and infrastructure and have a significant impact on the health and wellbeing of our Welsh community.	Noted.