

Appendix 3

Approach to EIA

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Y Bryn Wind Farm

Scoping Report Addendum

24 August 2023
1233647

Y Bryn Wind Farm Ltd

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1. Introduction

- 1.1.1. This scoping report addendum (the Addendum) has been prepared by Natural Power Consultants Limited (Natural Power) on behalf of Y Bryn Wind Farm Limited, as a supplement to the scoping report submitted in January 2021, in order to seek agreement on the scope for assessment of additional works, not included in the original scoping report, which are now to be included in the construction activities of the wider development. The additional scoping comprises the proposed access from the public highways for abnormal indivisible loads (AILs) and general construction traffic. All of the proposed infrastructure associated with the access is located in Neath Port Talbot County Borough Council (NPTCBC) area.
- 1.1.2. This scoping report addendum should be read in conjunction with (i) the Y Bryn Wind Farm January 2021 scoping report, in particular chapters 1-9, which this scoping report addendum will not repeat, and (ii) the draft Environmental Statement (Draft ES) that underwent statutory pre-application consultation (PAC) from June to July 2023.

2. Site Access

- 2.1.1. The locations for the access are as shown on Figure 1. This also includes the original site boundary encompassing the forestry area where the wind farm is located, as shown in the January 2021 scoping report submission, and as shown in combination in the Draft ES.
- 2.1.2. The Addendum seeks an agreement on the scope of assessment for two components to the proposed site access:

(1) access for AILs from M4 motorway to the west of the wind farm site, via a newly created, single-purpose works exit slipway (also referred to as the 'new access route from M4'); and

(2) a connecting link for AILs between the southern and northern sections of the Y Bryn Wind Farm, and for general incoming and outgoing construction traffic for the southern section, proposed to travel via the route of the existing forestry haulage road (also referred to as 'link road').
- 2.1.3. In respect of component (1), following the newly created exit from the motorway onto farmland, a new road will be constructed to climb Mynydd Brombil, broadly following the route of an existing farm road. Upon reaching the top of the hill, the new road will join the existing Mynydd Brombil Wind Farm access roads, following on these eastwards and entering the Y Bryn site boundary identified in the January 2021 scoping report. The operational use of this new road will be restricted to AIL carrying turbine components, and their associated escort vehicles. Once the components have been delivered and offloaded at the site, the AIL vehicle will compress down to being a Heavy Goods Vehicle (HGV) and will exit the forest using one of the proposed HGV routes. Indicative earthworks (cut and fill) are illustrated on drawing 'Y *Bryn-X-015*' and in chainage cross-sections in drawings 'Y *Bryn-X-016*' sheets 1 to 6.
- 2.1.4. In respect of component (2), the route of the existing forestry haulage road, which was used for the construction of Mynydd Brombil Wind Farm (in reverse), will be followed by AILs heading north through the golf club land, towards the existing junction with the B4282 Neath Road, (where some widening works may be required), thereafter AILs will cross directly over the public highway to re-enter Y Bryn site boundary as shown in the January 2021 scoping report. This route will also be used for general construction traffic entering and exiting the southern section of the site from the B4282.
- 2.1.5. In total, only approximately 1.4 km of newly constructed road is currently estimated to be required for the delivery of AILs and other construction traffic into the January 2021 scoping site, with the remainder being subject only to relatively limited possible widening or otherwise reinforcement works. New access track

will generally be unpaved (stone surface) and of 5 m running width, wider in bends, with a 1 m shoulder verge to either side and 1:2 side slopes. Junctions with the public highways will be designed in accordance with the Design Manual for Roads and Bridges (DMRB)¹ (as shown in Draft ES Appendix 11.2), with metalled finishes and other measures as required.

- 2.1.6. Notwithstanding that the turbines being proposed as part of this application are of a greater scale compared to the existing Mynydd Brombil Wind Farm, fundamentally the vehicles (tractors and trailers) transporting components, their wheel base, and maximum legal axle weights in the UK, are no different to the vehicles originally used, and so it is anticipated that for the most part straight sections of existing previously used road can be reused with only limited upgrades including resurfacing and review of bridge/culvert/drainage structure integrity.

3. Consultation Responses

- 3.1.1. To date, the applicant has consulted with South Wales Trunk Roads Authority (SWTRA)² who have indicated that they would have no objection in principle to the proposed new access slipway from the M4, subject to design approval via planning condition.

Table 3.1: Summary of consultation responses

Consultee	Comments and recommendations	Addressed responses/outcomes
All formal initial scoping responses can be found in full in Appendix 3.3 of the Draft ES.		
Planning Inspectorate Wales (now Planning Environment Decisions Wales) – Wind Farm Formal Scoping	The Planning Inspectorate provided a scoping direction in response to the proposed development's scoping report. The following key elements were noted in the scoping report in relation to traffic and transport: - The impact of the proposed development on the public road network should be assessed using the latest guidance, including the Guidelines for the Environmental Assessment of Road Traffic (IEMA 1993); - The study would consider effects during construction, operation and decommissioning; and - The traffic and transport chapter will include the Traffic Impact Assessment (TIA) and a preliminary TMP.	All comments noted and addressed in Chapter 11 and associated appendices within the Draft ES.
NPTCBC – Wind Farm	NPTCBC policy for wind farms recommends that planning permission is not determined until such	Preliminary TMP is included in the draft ES, Appendix 11.2.

¹ Highways Agency, (2011). Design Manual for Roads and Bridges (DMRB), Volume 11, Section 2 (Part 5, HA 205/08). Also published by: Transport Scotland, Welsh Government, The Department for Regional Development (Northern Ireland).

² Meetings held via Microsoft Teams 14th September 2020 and 28th January 2022, with representatives from the Department for Economy and Infrastructure, and SWTRA. Meeting minutes can be found in full in Appendix 3.3 of the Draft ES.

Consultee	Comments and recommendations	Addressed responses/outcomes
Formal Scoping	time as a TMP for the access route to the site has been agreed with the Highway Authority.	Final details of the TMP to be agreed via condition post consent.
BCBC – Wind Farm Formal Scoping	It was stated that the threshold of 30% noted in the Guidelines for the Environmental Assessment of Road Traffic (IEMA 1993) was not acceptable and that an increase of 5% traffic on the highway network would constitute a material planning consideration needing further analysis. BCBC policy for wind farms recommends that planning permission is not determined until such time as a TMP for the access route to the site has been agreed with the Highway Authority. A meeting was held between Natural Power and BCBC³ to discuss the thresholds; the key outcome was that Natural Power would identify any areas of concern if that arise and apply mitigation measures through the TMP as necessary.	Preliminary TMP is included in the draft ES, Appendix 11.2. Final details of the TMP to be agreed via condition post consent.
South Wales Trunk Roads Authority (SWTRA) – Wind Farm Formal Scoping	The principle of creating a new slip road was agreed, provided that the final design for the junction should be in accordance with the Design Manual for Roads and Bridges (DMRB) and would need approval by SWTRA via a suitably worded planning condition.	SWTRA will be consulted through the access scoping and throughout the development of the proposal. Draft planning condition wording is in circulation.
All formal PAC responses will be found in Appendix 3.4 of the to be submitted final ES.		
NPTCBC – PAC Response	<i>'As stated previously, we do not think that the nature of the access works from the M4 are clearly shown in the application and the impacts of the proposed access off the M4 should be given more priority within the submission, as an intrinsic part of the development.'</i>	Additional information will be included within the final submitted ES.
NPT Highways and Drainage – PAC Response	<i>'We have no highway or drainage objection subject to the following observations...</i> <i>4. ...it is noted that no vehicles are proposed to exit the site via the proposed M4 diverge – we support this proposal.</i> <i>12. The AIL TMP refers to mitigation proposals to ensure safe delivery of AIL, however no details of site setup, parking, operational vehicles, whether or not additional support is required for widening of access tracks off the trunk road, together with security of access road and proposed preventative</i>	AIL TMP will be agreed through further consultation with SWTRA and LPAs. Detailed design of the diverge will be frozen and submitted after scoping. A Road Safety Audit will be completed in the interest of safety for AIL drivers.

³ Meeting held with Leigh Tuck, Senior Transportation Development Control Officer on 17/05/2021.

Consultee	Comments and recommendations	Addressed responses/outcomes
	<i>measures required to not allow other vehicles to enter off the slip road or park once development is completed. SWTRA to comment on deliveries/delays and structures of ministerial roads.</i> <i>13. No details of the proposed access slip road and associated highway tie-in to exiting private land (cut and fill), lighting and additional street furniture/signage etc has been submitted for assessment...</i> <i>19. No Road Safety Audit required for access road off the M4 (Abnormal Indivisible Loads) because the access road is purely for operational traffic not public use.'</i>	
BCBC – PAC Response	<i>'It is noted the proposed construction/abnormal route access is now through the Borough of Neath and Port Talbot. And whilst there is likely to be significant impacts in respect of the access route this is more a matter that is likely to be raised within the observations of Neath Port Talbot County Borough Council Local Planning Authority.'</i>	N/A
Welsh Government Transport – PAC Response	<i>'The General Arrangement of the intended junction improvements in accordance with the Design Manual for Roads and Bridges (DMRB)(in particular CD 109 and CD 123), on a suitably scaled drawing, with significant dimensions clearly identified (widths, corner radii, longitudinal gradients etc.). This will allow Welsh Government to review the junctions compliance with the design standards, with any departures from the DMRB clearly identified at this stage. Please note due to the topography of the surrounding land, we require the full footprint of the works, including any embankments or retaining structures etc. as required.</i> <i>Signage strategy – this is outstanding and information should take account of the potential for sign clutter, as well as reduced effectiveness of the existing signs in proximity to Junction 38, particularly the ADS sign.</i> <i>The enforcement strategy – this is required to confirm how the junction will be controlled for use by windfarm component transportation only.</i>	The applicant responded to highlight DMRB junction design for M4 access is page 56 of Appendix 11.2 in the Draft ES. The applicant requested confirmation that all further points could be addressed within planning conditions which would be agreed post consent.

Consultee	Comments and recommendations	Addressed responses/outcomes
	A Road Safety Audit Stage 1, in accordance with the Design Manual for Roads and Bridges GG 119. A stage 1 RSA will be critical for determining the feasibility and giving opportunity to close out any significant issues feeding into detailed design. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.*	

Source: Natural Power

- 3.1.2. It is proposed that planning permission for the proposed access will form an element of the application for the proposed Y Bryn Wind Farm. Any additional consents required for the access will be sought following the receipt of consent for the development and operation of the Y Bryn Wind Farm.

4. Topic Addendums

4.1. Approach to Addendums

- 4.1.1. The following sections will provide topic-by-topic addendums to the January 2021 scoping report, in light of changes in scope that are proposed in respect of the proposed site access. They will do so in recognition of the scoping direction received March 2021, in addition to any further correspondence with stakeholders in the time since, including PAC in June 2023.
- 4.1.2. Topics have been listed in the same order as in the January 2021 Scoping Report and topic sections will provide addendums only, where relevant. Otherwise, all of the general scope and methodologies of the January 2021 Scoping Report extend in their application to the site access.

4.2. Ecology

- 4.2.1. Baseline ecology survey work for the site access was undertaken during June 2021. Two areas were surveyed, with both survey areas covering the access routes that were proposed at that time (route plus 250 m survey buffer). A National Vegetation Classification (NVC) survey was undertaken to classify the habitats within the survey areas (see Figure 2). A protected mammal survey was also undertaken, encompassing otter and water vole surveys along permanent watercourses, as well as surveying for terrestrial protected mammal species: badger, plus pine marten and polecat. In addition, a preliminary bat roost assessment was undertaken as part of the same walkover survey. Survey methods are described in the January 2021 scoping report and Draft ES, with results detailed within the Draft ES.
- 4.2.2. The desk study described in the January 2021 scoping report, which was carried out in November 2020 (and has since been updated in November 2021), covered a search area that encompasses the proposed site access route. The full list of designated sites and ecological features found in the vicinity of the proposed development (which includes the proposed access routes) is not repeated here, however, of relevance to the link road are three Sites of Importance for Nature Conservation (SINCs): NPTCBC Watercourses SINC, Nant-y-Crynwydd SINC and Y Parc (North) SINC which are crossed by, or lie immediately adjacent to, the access routes.

- 4.2.3. The protected mammal survey undertaken in 2021 recorded a single set of badger latrines in the survey area of component (2). No other protected mammals, nor their signs, were recorded in 2021. Otter signs were recorded in 2022 during additional surveys in the wider area, but these were greater than 250 m from component (2).
- 4.2.4. Full details of the NVC survey are presented in the ecology chapter of the Draft ES. A summary of all habitat communities recorded within the survey areas of the previously proposed site access routes components (1) and (2) is provided in Table 4.2a.

Table 4.2a: Phase 1 and NCV communities present within the access track survey areas 2021

Phase 1 Habitat Type	NVC Community	Conservation Designation	Survey Area / Component
A2.1 Scrub dense/continuous	W1 <i>Salix cinerea-Galium palustre</i> woodland	Sec7: Wet woodland	2
A1.1.1 Broad-leaved woodland: semi-natural	W6 <i>Alnus glutinosa-Urtica dioica</i> woodland	N/A	2
A1.3x Woodland: mixed	W11 <i>Quercus petraea-Betula pubescens-Oxalis acetosella</i> woodland	Sec7: Upland oak woodland	1
A2 Scrub	W23 <i>Ulex europaeus-Rubus fruticosus</i> scrub	N/A	1
A2.2 Scrub: scattered	W24 <i>Rubus fruticosus-Holcus lanatus</i> underscrub	N/A	2
A2.2 Scrub: scattered	W25 <i>Pteridium aquilinum-Rubus fruticosus</i> underscrub	N/A	2
D2 Wet dwarf shrub heath	M15 <i>Scirpus cespitosus-Erica tetralix</i> wet heath	Annex 1: Northern Atlantic wet heaths with <i>Erica tetralix</i>	2
B5 Marshy grassland	M23 <i>Juncus effusus/acetiflorus-Galium palustre</i> rush-pasture	N/A	2 1
E1.7 Bog: wet modified	M25 <i>Molinia caerulea-Potentilla erecta</i> mire	Annex 1: Degraded raised bogs still capable of natural regeneration	2
B2 Neutral grassland: semi-improved	MG6 <i>Lolium perenne-Cynosurus cristatus</i> grassland	N/A	2 1
B1.1 Acid grassland: unimproved	U4 <i>Festuca ovina-Agrostis capillaris-Galium saxatile</i> grassland	N/A	2 1
B1.1 Acid grassland: unimproved	U6 <i>Juncus squarrosus-Festuca ovina</i> grassland	N/A	2
C1.2 Bracken – dense/continuous	U20 <i>Pteridium aquilinum-Galium saxatile</i> community	N/A	2 1
F1 Swamp	S3 <i>Carex paniculata</i> swamp	Sec7: Upland flushes, fens & swamps	2

Source: Natural Power

- 4.2.5. Proposed mitigation and enhancement measures are as described in the Draft ES.

4.2.6. Following the responses received from consultees following the January 2021 scoping report, the ecology chapter of the Draft ES assesses potential effects of the proposed site access alongside potential effects of the proposed wind farm for the following ecological features: habitats, designated sites, protected mammals, reptiles and invertebrates. Therefore, these features are scoped in.

4.3. Ornithology

4.3.1. Baseline ornithology surveys were undertaken for the proposed site access routes during the 2021 breeding season. Walkover breeding bird surveys (BBS) were carried out based upon the standard methodology for assessing upland wader populations, as described by Brown & Shepherd (1993)⁴, but utilising the four-visit methodology as is now recommended (Calladine *et al.*, 2009)⁵. The survey method was adapted to include the recording of all bird species encountered, so that as well as recording open ground species (such as any breeding waders), the surveys also recorded passerines present in areas of scrub and trees.

4.3.2. The surveys covered the access routes (where new tracks/track upgrading shall be required) plus a surrounding 400 m buffer (based upon the proposed access routes at that time). The survey buffer was chosen based upon the estimated maximum disturbance distance of those ornithological features considered to have potential for breeding within the vicinity of these areas (Goodship and Furness, 2022)⁶. The surveyed areas encompass the currently proposed site access.

4.3.3. The four survey visits were undertaken between May and July 2021. It is acknowledged that the first visit for BBS usually takes place in the second half of April but due to the cold weather and late spring in 2021 it is considered that the timing of the surveys will not have resulted in significant omissions and survey effort is considered sufficient to have adequately identified the community of breeding ornithological features present in the survey area. After the last survey visit, records from all visits were collated and analysed to estimate the location of breeding territories. Territories were analysed using a cluster analysis method, as outlined in Bibby *et al.* (2000)⁷.

4.3.4. As well as carrying out dedicated surveys, a desk study was undertaken to collate relevant existing ornithological data, where available, as described in the January 2021 scoping report. Additionally, Gower Ornithological Society (GOS) was also approached for any relevant records in these areas. No site-specific data was available but the 2019⁸, 2020⁹, 2021¹⁰ and 2022¹¹ GOS Gower Bird Reports were consulted (these incorporating records from NPT). Note that species accounts within the GOS Gower Bird Reports vary in the level of detail provided¹² and where place names are given, these are approximate locations of records.

⁴ Brown, A. F. & Shepherd, K. B. (1993) *A method for censusing upland breeding waders*. Bird Study, 40: 189-195.

⁵ Calladine, J., Garner, G., Wernham, C. & Thiel, A. (2009) *The influence of survey frequency on population estimates of moorland breeding birds*. Bird Study, 56: 3, 381-388.

⁶ Goodship, N.M. and Furness, R.W. (MacArthur Green) Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. NatureScot Research Report 1283.

⁷ Bibby, C.J., Burgess, N.D., Hill, D.A & Mustoe, S. (2000). *Bird Census Techniques*. Second edition. Academic Press, London.

⁸ Gower Ornithological Society (2019). *Gower Birds 2019*. Volume 11. Number 2.

⁹ Gower Ornithological Society (2020). *Gower Birds 2020*. Volume 11. Number 3.

¹⁰ Gower Ornithological Society (2021). *Gower Birds 2021*. Volume 11. Number 4.

¹¹ Gower Ornithological Society (2022). *Gower Birds 2022*. Volume 11. Number 5.

¹² Information provided in accounts for common and widespread species, such as dunnoek, does not include a full list of record locations.

4.3.5. Table 4.3a summarises the results of the BBS and the desk study. Only those species that showed evidence of breeding are presented for the BBS (for example birds holding territory on consecutive visits, a pair in suitable habitat, or those recorded nest building or feeding young). Birds for which there was no evidence of breeding (for example those recorded on one visit only and which showed no behaviour indicative of breeding; or those simply overflying the site) are not included in the table.

4.3.6. Species presented for the desk study are those records returned by SEWBReC (South-east Wales Biological Records Centre) for the access track survey areas made during the period 2015-2020 (species of conservation interest (species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended)¹³ and species listed on Section 7 of the Environment (Wales) Act 2016¹⁴) only). Note that the desk study records do not indicate breeding, only presence at the time of recording. Species that appear on the Section 7 list are highlighted in bold in Table 4.3a.

Table 4.3a: Bird species recorded within the access track survey areas

Species	Recorded during BBS (2021)*	Existing records (2015-2021)**
Mediterranean gull		X
Herring gull		X
Marsh harrier		X
Red kite		X
Kestrel		X
Magpie	X	
Carrion crow	X	
Willow tit		X
Blue tit	X	
Great tit	X	
Skylark	X	
Long-tailed tit	X	
Wood warbler		X
Willow warbler	X	
Chiffchaff	X	
Grasshopper warbler	X	X
Blackcap	X	
Garden warbler	X	
Whitethroat	X	
Wren	X	
Nuthatch	X	
Treecreeper	X	
Blackbird	X	
Starling		X
Song thrush	X	X

¹³ Available from: <https://www.legislation.gov.uk/ukpga/1981/69> [Accessed 21/08/2023]

¹⁴ Available from: <https://www.biodiversitywales.org.uk/environment-wales-act> [Accessed 21/08/2023]

Species	Recorded during BBS (2021)*	Existing records (2015-2021)**
Mistle thrush	X	
Redwing		X
Spotted flycatcher		X
Robin	X	
Stonechat	X	
Wheatear	X	
House sparrow	X	X
Dunnock	X	
Pied wagtail	X	
Meadow pipit	X	
Tree pipit	X	X
Chaffinch	X	
Brambling		X
Bullfinch	X	
Linnet	X	X
Lesser redpoll		X
Crossbill		X
Goldfinch	X	
Reed Bunting	X	X
*Only species showing evidence of breeding are included.		
**Only priority species listed in the data search are presented. These records do not indicate breeding.		

Source: Natural Power

- 4.3.7. Only passerine species were recorded during the BBS. The majority of these are species associated with scrub and woodland habitats, with those in the forest edge also recorded as part of the BBS of the wind farm site boundary. Non-passerine records were returned in the data search (red kite, kestrel, herring gull). These species were also recorded during baseline surveys for the proposed development, but all were considered to be non-breeding within the survey areas. No records of waders (breeding or non-breeding) were returned in the data search.
- 4.3.8. The ornithological features recorded within the access track survey areas are a typical breeding community of widespread passerine species. In response to the January 2021 scoping report, it was stated that displacement/disturbance effects on passerines be assessed in the ornithology chapter of the ES. The potential impact of the site access has been incorporated into the Draft ES and therefore breeding passerines are scoped in.
- 4.3.9. No surveys in the non-breeding season have been undertaken for the proposed access routes. However, it is understood that habitat creation at Mynydd Brombil Wind Farm has been undertaken to encourage wintering golden plover, and the area that is the focus of this habitat management is crossed by the western site access route. The annual monitoring reports for Mynydd Brombil Wind Farm were sought but could not be obtained. Instead, specific ornithological information was shared by the operator's Asset Manager. Potential effects on non-breeding golden plover have been considered in the ES.
- 4.3.10. No further ornithological surveys are proposed for the site access. Proposed mitigation and enhancement measures are as described in the Draft ES.

4.4. Seascape, Landscape and Visual Impact Assessment (SLVIA)

- 4.4.1. The scope of the SLVIA will be as outlined in the January 21 scoping report. It will assess effects on the physical landscape within the site boundary, together with the wider landscape character and visual amenity within a 45 km radius study area.
- 4.4.2. The methodology proposed for assessing effects, including those resulting from the proposed site access and other infrastructure, will be as per the Draft ES.
- 4.4.3. There will be no change to the scope or approach to the SLVIA in relation to component (2) other than change to the Y Bryn site boundary.
- 4.4.4. However, in relation to component (1), the scope of the assessment will need to be revised to assess landscape and visual effects in sufficient detail, along with a change to Y Bryn site boundary.
- 4.4.5. Landscape designations extending across this area accommodating component 1 and partially within the area accommodating component 2, include:
- Special Landscape Area (NPTCBC EN2); and
 - Landscape of Historic Interest (NPTCBC SP21).
- 4.4.6. The site access (component 1) will extend through LCA 06 Mynydd Brombil, Mynydd Emroch and Mynydd Dinas, (NPTCBC Landscape Assessment 2004, White Consultants). This LCA *'takes in the scarp slope and open scarp tops rising to the east of Port Talbot, and sitting above the M4 motorway. The landform provides a solid backcloth for the coastal plain creating an important and prominent feature. The scarp is highly visible from the M4, as it runs along the base, while the higher ground is generally hidden from view. The upland characteristics creates a unique [sic] in such close proximity to the M4.'*
- 4.4.7. The site access (component 1) will also be within LANDMAP Visual and Sensory Aspect Area NPTVS811 and is described as *'possibly the most prominent and frequently viewed area in the county borough.'* It is evaluated as high value overall.
- 4.4.8. The scope of the LVIA within the Draft ES has been extended to provide more detailed consideration of effects in relation to the visual backcloth this area provides, including:
- Views from the M4 corridor;
 - Views from the Wales Coast Path. This splits to go east through Margam and west to follow the base of the scarp slope east of the M4;
 - Views from the community at and around Margam to the west of the site access; and
 - Views from the wider coastal plain.
- 4.4.9. *'Viewpoints 16 The Princess Margaret Way, Aberavon'* and *'24 Wales Coast Path, Kenfig Burrows'* demonstrate existing views from the wider coast plain and from the Wales Coast Path as it passes through the plain. Photomontages will be prepared to illustrate likely effects of all permanent proposed infrastructure and turbines (if applicable).
- 4.4.10. An additional representative viewpoint with visualisations has been provided within the Draft ES to illustrate the existing view and the likely effects following implementation of the site access (component 1) within Margam to the west. Details of this additional viewpoint are outlined in Table 4.4a.

Table 4.4a: Additional Viewpoint details

Viewpoint No	Location	Distance to site access	Eastin g	Northing	Reason for Inclusion of Viewpoint
32	Junction of Stallcourt Road/A48 Margam	Approx. 150 m at nearest point	278237	187789	NCN Route 04. Residents of Margam Road users.

Source: Soltys Brewster

4.5. Cultural Heritage

- 4.5.1. Baseline heritage survey work over the wind farm site boundary (as per January 2021 scoping report) and study areas commenced in January 2021 and to date has comprised of a desk-based assessment (DBA) and a walkover survey of the wind farm site. The DBA has used a 2 km study area around the wind farm site to identify designated and non-designated historic assets. The site access lies fully within the study area used for the DBA. A stage 1 setting assessment has also been carried out using a wider study area of up to 20 km from Y Bryn site boundary to identify historic assets that may experience change within their setting as a result of the proposed wind farm.
- 4.5.2. The link road area includes:
 - Part of the non-designated Heol y Moch (The Pig’s Way) (HER reference: 01077.0w), a trackway used in the medieval period and possibly originating in the prehistoric period;
 - Part of the former Port Talbot Railway (HER reference: 01435.0m) including the Cwmcerwyn Tunnel (GER reference: GGAT05976w); and
 - The site of two upright stone slabs recorded by the Ordnance Survey in 1956 but which are no longer present (HER reference: GGAT00711w).
- 4.5.3. The area considered for the western access from the M4 includes:
 - The Ergyd Isaf round barrows (SM GM160) scheduled monument;
 - A non-designated dry-stone wall (Brombil Farm, Margam 1 HER reference: GGAT05328w); and described as ‘one of the better preserved examples of dry stone wall boundary on the property’.
 - Two non-designated house platforms (HER reference: GGAT01993w and 01994w), and
 - An unusual cross shaped pillow mound (HER reference: GGAT00743w) which is related to a group of pillow mounds (HER references: 00949w and 00733w) all of which are non-designated.
- 4.5.4. All of these assets have been considered for direct physical effects and effects resulting from change in their setting within the Draft ES.
- 4.5.5. The western access also lies within the Registered Historic Landscape of Margam Mountain. The site access has been included within the elements of the scheme assessed under the Assessment of the Significance of the Impact of Development on Historic Landscape 2 (ASIDOHL2) assessment for the Registered Landscape within the Draft ES.
- 4.5.6. The effect of visibility of the site access on the contribution that setting makes to the significance of historic assets has also been considered within the Draft ES – it is not proposed to extend the 20 km study area as at this range no significant effects as a result of the AIL/HGV access alone are predicted.

4.6. Hydrology, Geology and Hydrogeology

- 4.6.1. UK Soil Observatory (UKSO) mapping indicates that the soil type from the proposed junction off the M4 to the proposed wind farm (component 1) is mapped as freely drained acid loamy soils over rock. As a consequence of the presence of this soil type peat surveys are not deemed to be a requirement.
- 4.6.2. For the link road between the two forestry blocks (component 2) UKSO soils map indicates that there are slowly permeable wet, very acid upland soils with a peaty surface and freely draining acid loamy soils over rock mapped. The results of the extensive peat probing undertaken as part of the Draft ES show that the proposed development is underlain by soils rather than peat, It is also acknowledged that this section of the route is predominantly utilising existing track to be upgraded and therefore no peat surveys are proposed.
- 4.6.3. The methodology for watercourse crossing assessments described in the January 2021 Scoping Report will be followed for the mapped watercourses within the study area for the two access components being scoped in this scoping addendum..
- 4.6.4. The original private water supply (PWS) search area, set out for the January 2021 scoping boundary, covers a more than sufficient area from the new exit slipway off the M4 (component 1). The original PWS search area provided PWS information over 2 km from the proposed exit slip road and it is considered unlikely to find any PWS within the urban area of Port Talbot town. Any PWS further outwith the original search area will be hydrologically and topographically separate from the proposed development and will therefore not be at risk.
- 4.6.5. The link road (component 2) would also have been covered by the existing search area, being located relatively central to the search area.
- 4.6.6. No other changes required to scope for the hydrology, geology and hydrogeology assessment.

4.7. Traffic and Transport

- 4.7.1. The site access options described in this scoping report addendum do not change the scope of the traffic and transport assessment as set out in the January 2021 scoping report (particularly in terms of an AIL Route Survey Report and Preliminary AIL Traffic Management Plan), other than in respect of consideration being given to the construction and use of the specific site access junctions now being identified, together with any necessary mitigation measures and additional consent under the Highways Act 1980, to allow work to take place in the highways boundary.

4.8. Noise

- 4.8.1. Noise associated with the AIL and HGV access routes to site will relate to their construction and potential decommissioning at the end of the life of the development. Noise has been assessed within the Draft ES in accordance with the guidance for construction noise as set out in BS 5228¹⁵.
- 4.8.2. Traffic noise associated with deliveries has been assessed, where relevant, within the Draft ES using the guidance within Calculation of Road Traffic Noise¹⁶ (CRTN). Subsequent to commencement of operations on site such vehicle movements will be low and will fall outside the scope of CRTN.
- 4.8.3. Measurements of the existing sound climate have been obtained for the nearest properties to the site access East (component 2). Measurements of the sound environment for properties for the site access

¹⁵ BS 5228-1:2009+A1:2014: Code of practice for noise and vibration control on construction and open sites, Part 1: Noise. (December 2008).

¹⁶ Department of Transport: Calculation of Road Traffic Noise (1988)

West (component 1), as reported within the Mynydd Brombil Wind Farm Noise Impact Assessment, indicate a sound environment dominated by traffic noise associated with vehicle movements along the M4.

4.9. Forestry

- 4.9.1. Along the proposed component 1 AIL route at Brombil, there is an area of approximately 2 ha of trees alongside the motorway. These trees are between 15-20 years old and appear to have been planted as part of the motorway maintenance/construction works. The trees are primarily broadleaved species of oak, beech and cherry with some Corsican pine. An area of this block of young trees will be required to be removed as part of the AIL construction. This is assessed in the Ecology chapter of the Draft ES, as it is not considered to form forest resource.
- 4.9.2. The access from the M4 climbs Mynydd Brombil and passes within 50 m of woodland designated as Ancient semi-natural woodland (ASNW). However, there will be no direct impacts or felling.
- 4.9.3. Along the proposed AIL component 2 to the north the route crosses a golf course. In the centre section the access passes through an area of scrub and trees. Upgrading the route for site access may require the removal of a small number of trees.

4.10. Health and Public Safety

- 4.10.1. The proposed access components described in this scoping report addendum do not change the scope of the health and public safety with the exception of air quality. Proposed scope of works for air quality is described below.

4.11. Air Quality

- 4.11.1. The Scoping Direction provided by PINS (now PEDW) in response to the original Scoping Report for the wind farm requested that the potential for air quality impacts on nearby sensitive designated habitats is assessed in the context of exhaust emissions from construction traffic, so this has been done within the Draft ES.
- 4.11.2. The location in which emissions will occur will be dictated by the proposed access components which will affect the geographical routing of the construction traffic. Therefore an air quality assessment has been provided within the Draft ES which considers the potential impacts of emissions from construction traffic on relevant designated ecological habitats, using both existing roads and the two proposed access components.
- 4.11.3. The distance beyond which road traffic emissions are unlikely to have a significant adverse impact on sensitive habitats is 200 m, as advised in Natural England guidance¹⁷, (there is no equivalent statutory guidance applicable specifically to Wales). The air quality assessment within the Draft ES therefore examines all sensitive designated ecological habitats within 200 m of the AIL new access route, and other vehicular access routes onto the site to be used during construction works. The assessment approach is also be guided by the Joint Nature Conservation Committee's publication on decision making thresholds for air pollution¹⁸, to which Natural Resources Wales were a contributory stakeholder.

¹⁷ Natural England. 2018. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.

¹⁸ CHAPMAN, C. & KITE, B. 2021. Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091.

- 4.11.4. The assessment takes account of the number and type of vehicles accessing the site during the construction works, the access routes used, the duration of construction works, and the sensitivity to air quality of the various designated sites within 200 m of relevant roads. Road traffic screening thresholds described in Natural England's guidance will also be used as appropriate.
- 4.11.5. In addition to the impacts on sensitive designated ecological habitats, the assessment in the Draft ES also considers the potential for impacts in relation on the nearby Port Talbot Air Quality Management Area (AQMA) adjacent to the M4 Motorway. The assessment examines current air quality conditions in the AQMA and the impacts on air quality in the AQMA arising from emissions from construction vehicles. This is in response to comments within the Scoping Direction from Neath Port Talbot County Borough Council.
- 4.11.6. The air quality assessment (in considering both impacts on ecological receptors and human health receptors in the Port Talbot AQMA) refers to relevant traffic screening criteria for human health published by Highways England¹⁹ (in collaboration with the Welsh Government) and the Institute of Air Quality Management²⁰.

4.12. Aviation and Existing Infrastructure

- 4.12.1. The proposed access components described in this scoping report addendum do not change the scope of the aviation section.
- 4.12.2. With regards to existing infrastructure, there is a footpath that runs along the length of component 2. There are several footpaths within the proposed scoping area for component 1. Consultation has been undertaken with the Public Rights of Way (PRoW) officer at NPTCBC to agree appropriate forms of mitigation as a result of construction and use of proposed new tracks on PRoW. Any direct impacts on PRoW will be temporary during construction of the tracks and wind farm. The existing Mynydd Brombil Wind Farm tracks pass underneath high-voltage overhead powerlines, and so appropriate safety measures shall be applied during construction.

4.13. Socio-Economics

- 4.13.1. The proposed access components described in this scoping report addendum do not change the scope of the socio-economic section.

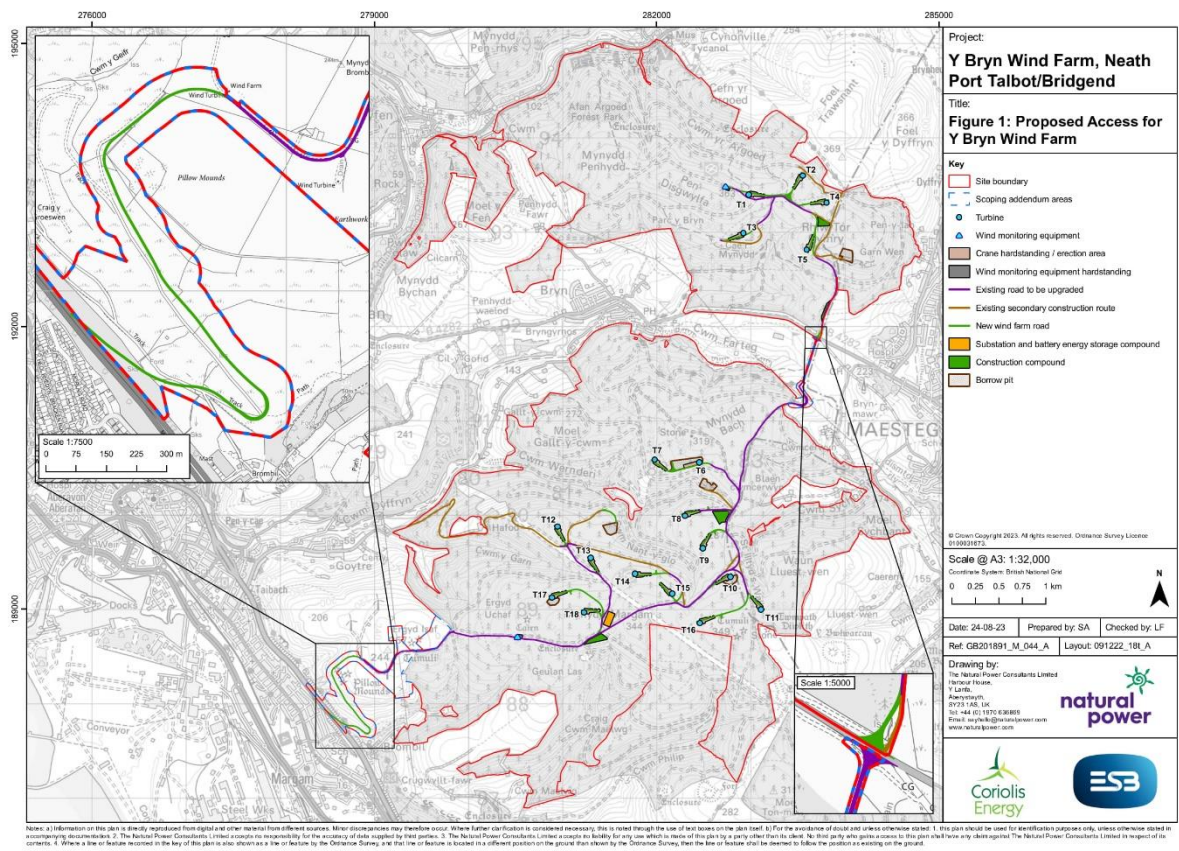
5. Responding to the Scoping Report

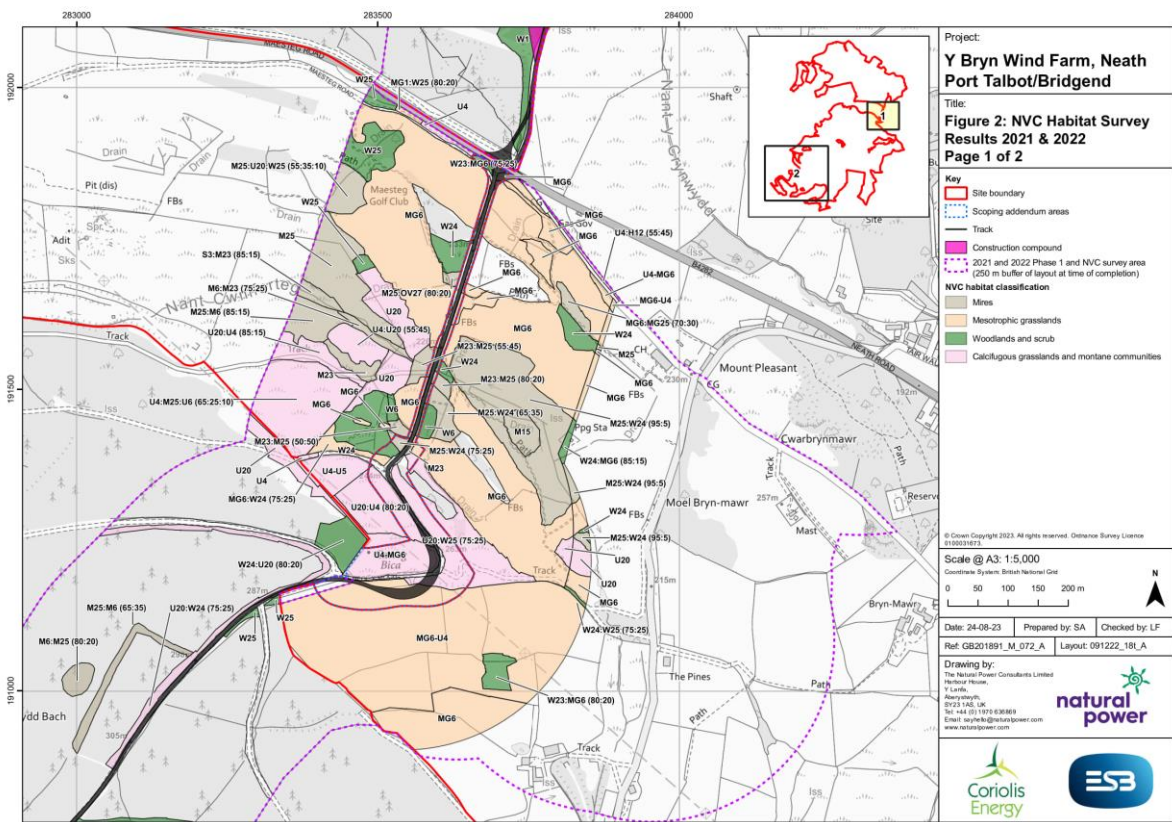
- 5.1.1. This access scoping report addendum has identified the baseline resource for the access routes for different topics where applicable. Where features or receptors are deemed to have a possible significant effect the methodologies to assess the effect have been provided for comment.
- 5.1.2. The responses provided by consultees will ensure that they too are in agreement, with the baseline and scope of the assessment. Responses on these will help ensure that the detailed methodology, survey and assessment are carried out with consideration to all statutory consultees and key stakeholders. This approach is in line with good practice in the planning system and an emphasis being communicated at a national level to focus the content of the EIA and ES on key elements identified at the scoping stage.

¹⁹ Highways England. Design Manual for Roads and Bridges LA105.

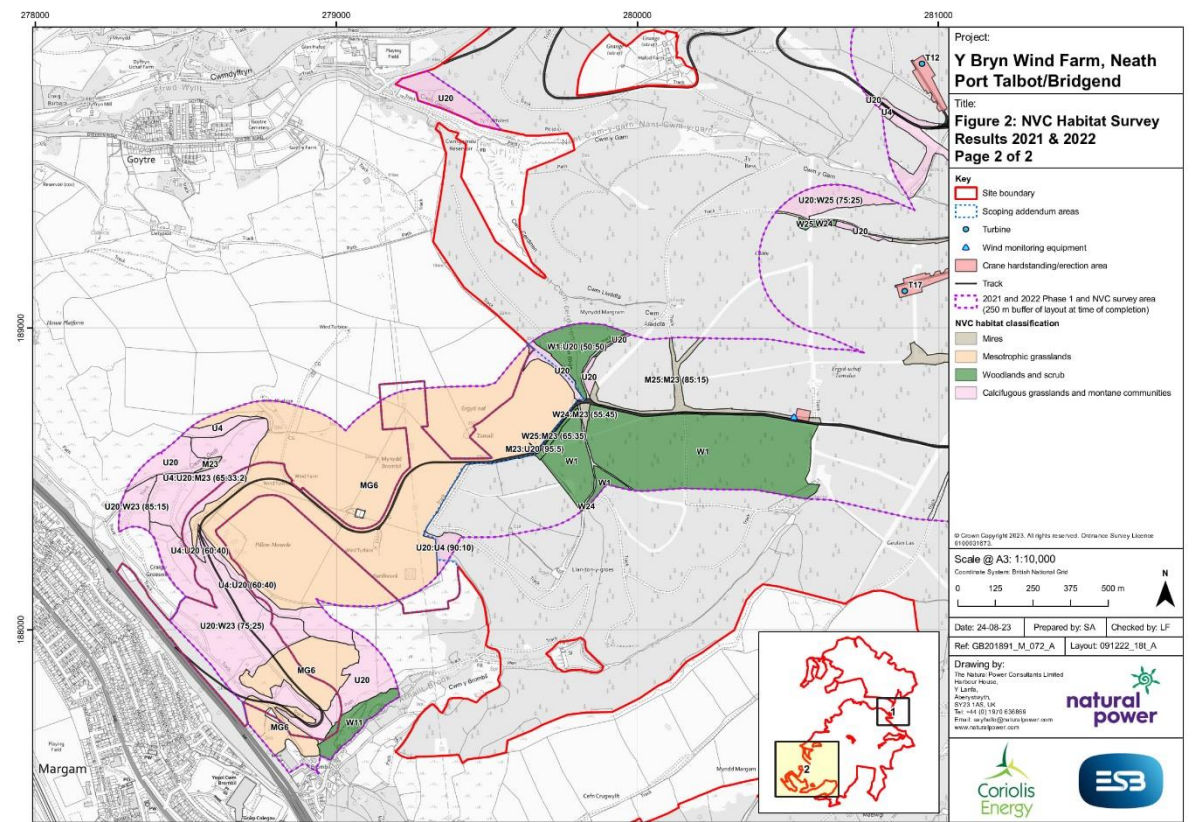
²⁰ Moorcroft and Barrowcliffe. et al. (2017) Land-use Planning & Development Control: Planning for Air Quality. v1.2. Institute of Air Quality Management, London.

6. Figures





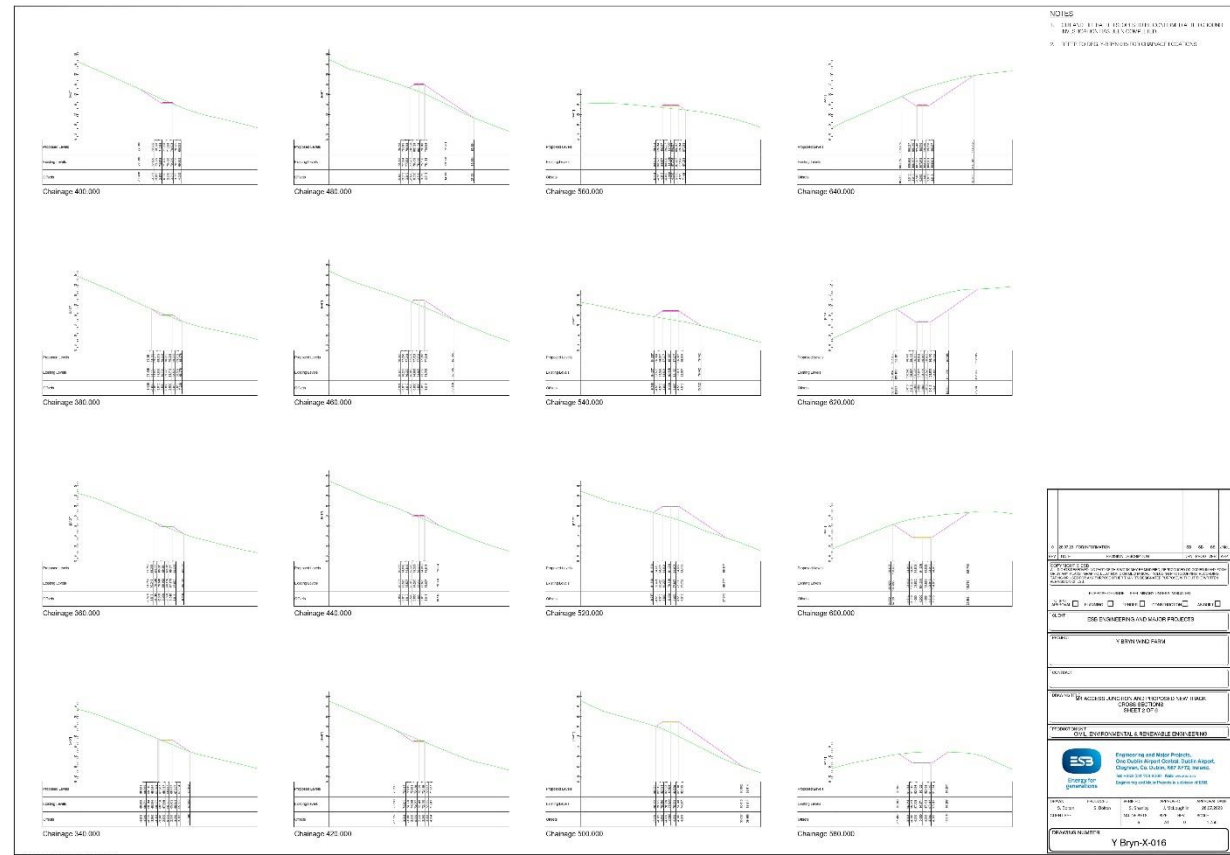
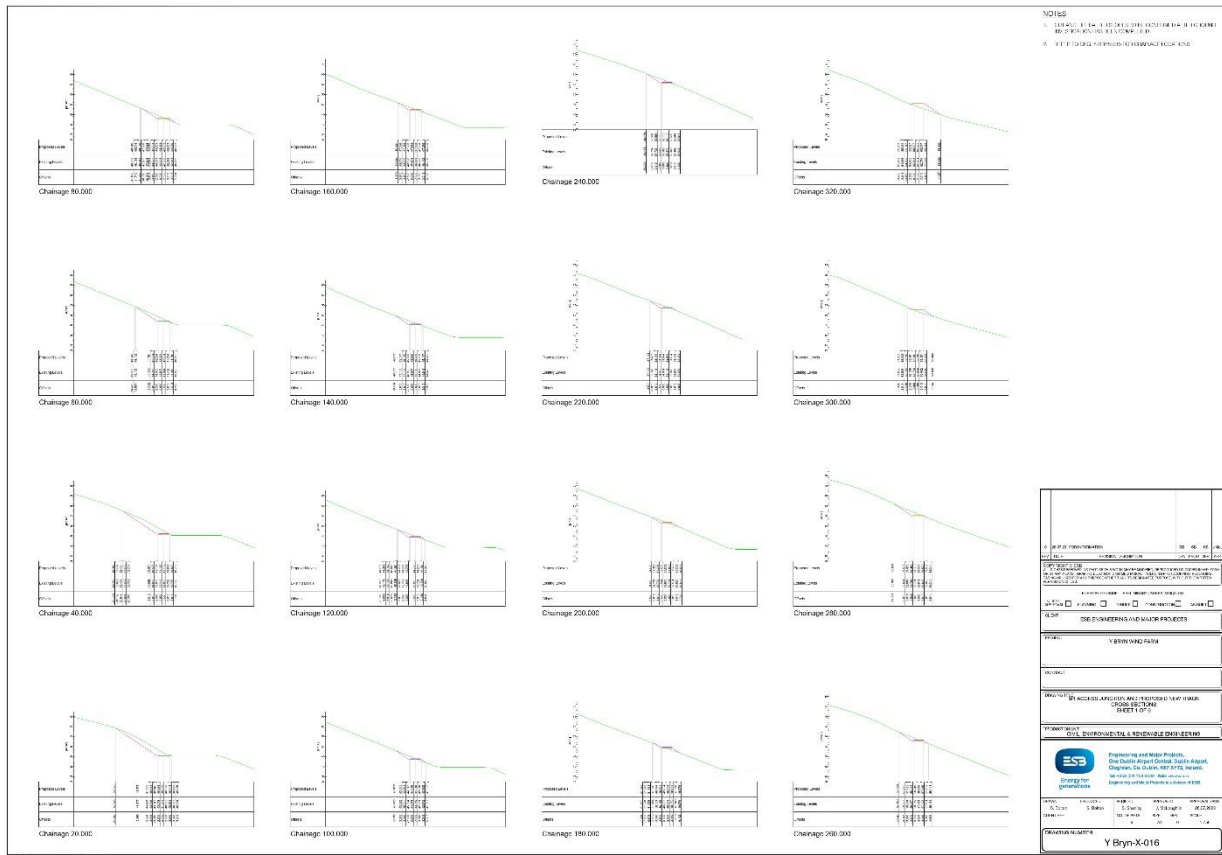
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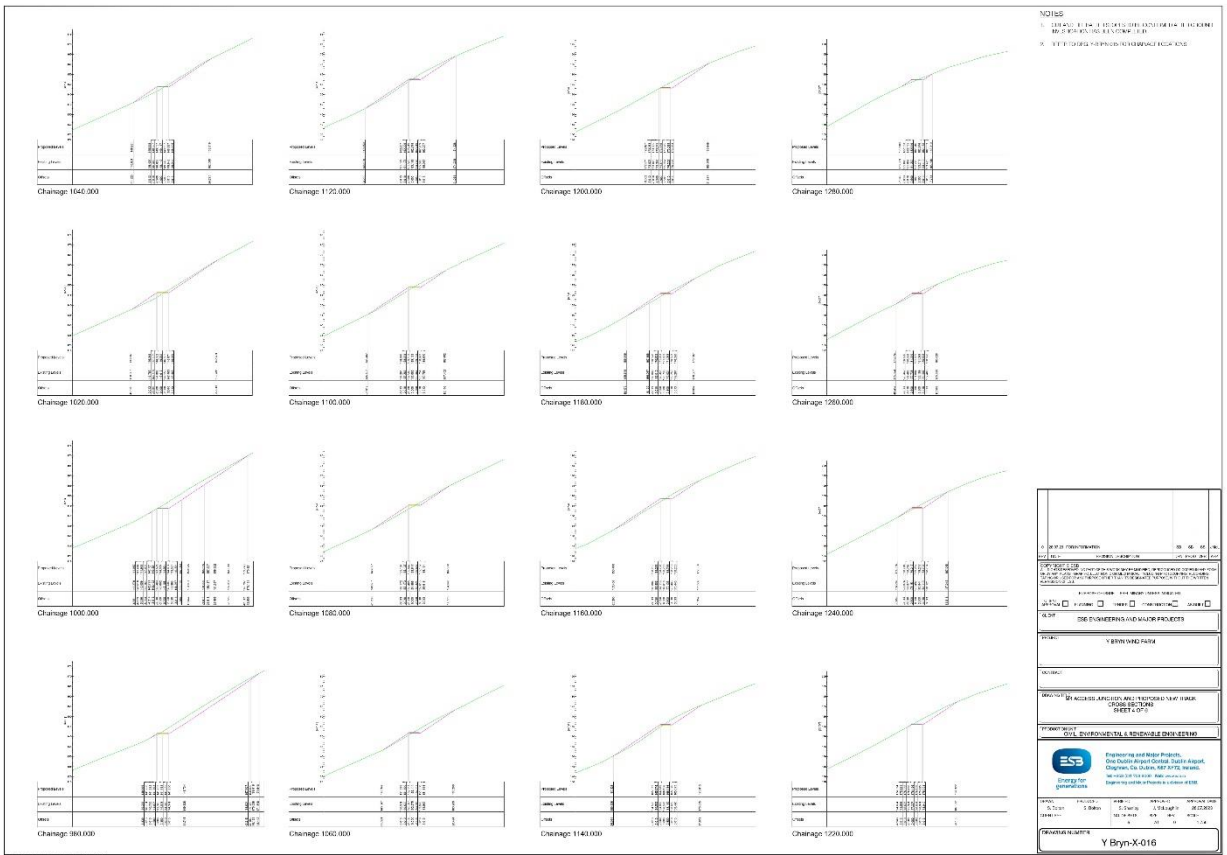
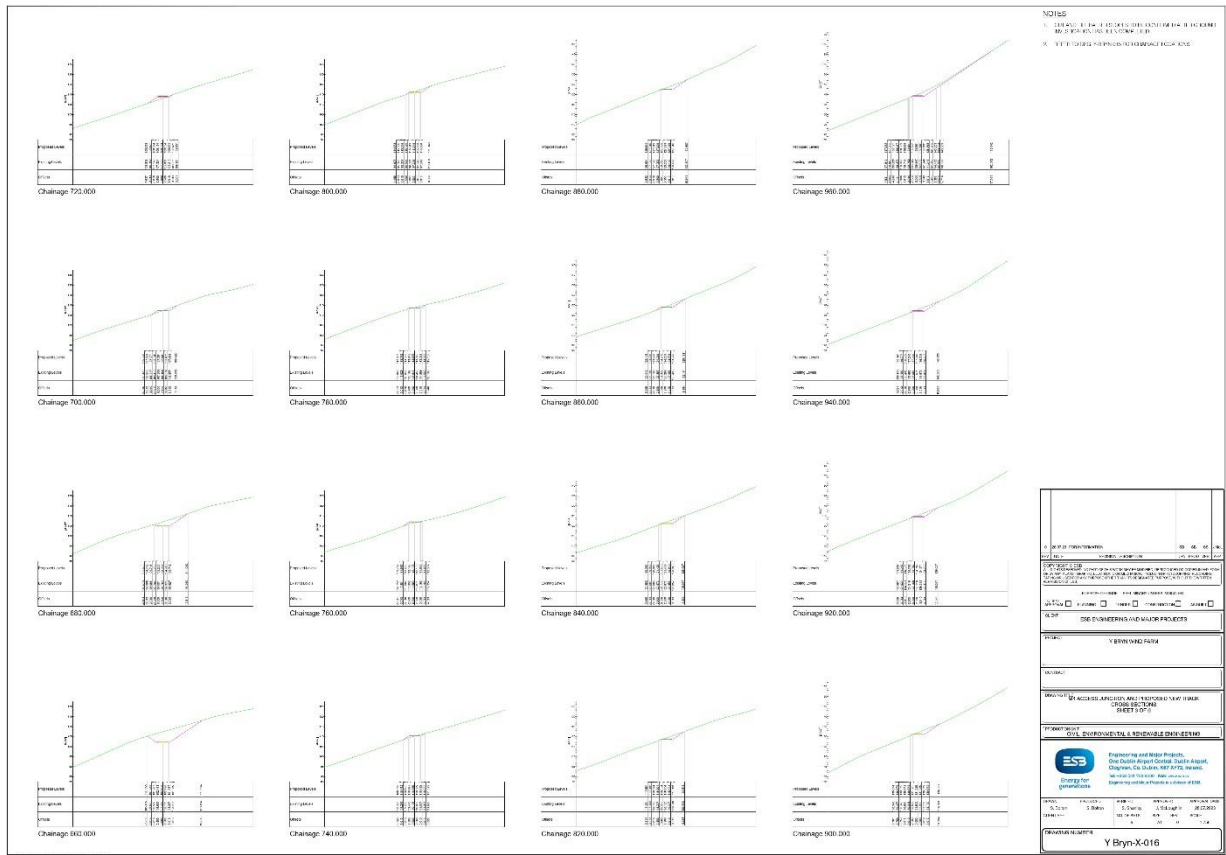


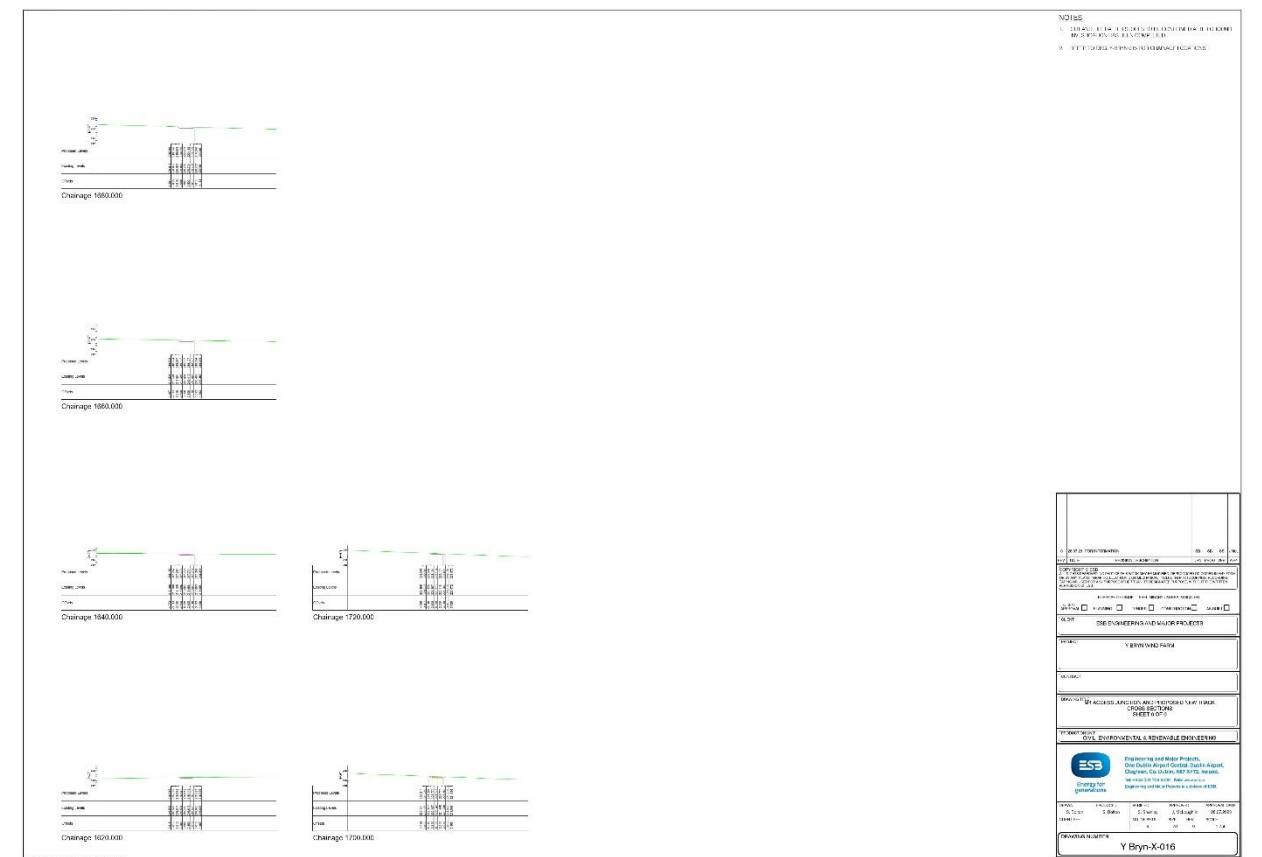
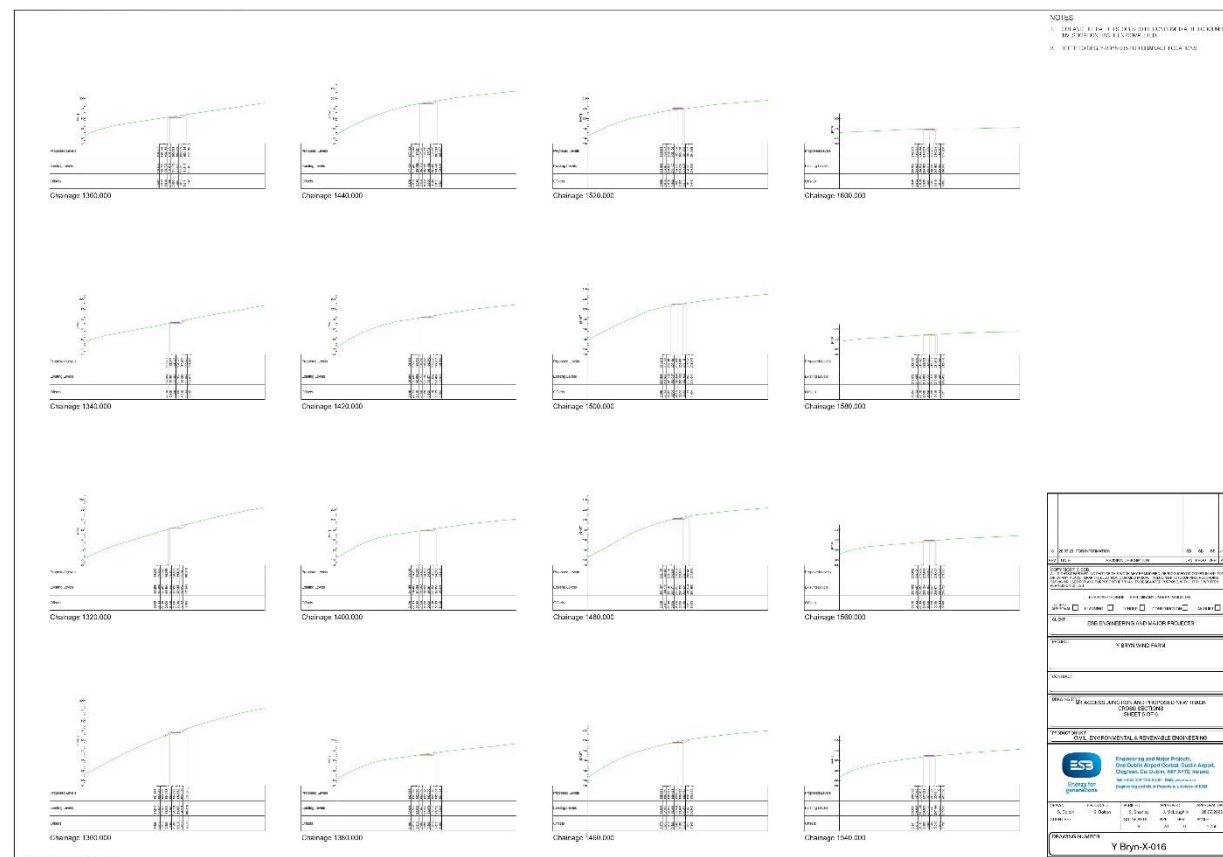
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7. Drawings











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