

Appendix 3

Approach to EIA

Contents

A3.3	CONSULTEE COMMUNICATIONS	4	A3.3.22	NATURAL RESOURCES WALES (NRW) LVIA CONSULTATION LETTER – OCTOBER 2021	73
A3.3.1	NEATH PORT TALBOT COUNTY BOROUGH COUNCIL (NPTCBC) – RESPONSE TO NATURAL POWER (NP) ECOLOGY SCOPING COMMENTS – JUNE 2021	4	A3.3.23	SWANSEA COUNCIL LVIA CONSULTATION LETTER – OCTOBER 2021	76
A3.3.2	NPTCBC_BIODIVERSITY CONSULTATION RESPONSE – JULY 2021	7	A3.3.24	VALE OF GLAMORGAN LVIA CONSULTATION LETTER – OCTOBER 2021	78
A3.3.3	NP RESPONSE TO NPTCBC CLARIFICATION ON SCOPING COMMENTS – SEPTEMBER 2021	10	A3.3.25	SWANSEA COUNCIL RESPONSE TO LVIA CONSULTATION LETTER - OCTOBER 2021	79
A3.3.4	NPTCBC – NP ECOLOGY COMMUNICATIONS– SEPTEMBER/OCTOBER 2021	12	A3.3.26	NPTCBC RESPONSE TO LVIA CONSULTATION LETTER - NOVEMBER 2021	79
A3.3.5	NP LETTER TO NPTCBC EXPLAINING APPROACH TO TOURISM – OCTOBER 2021	13	A3.3.27	NRW RESPONSE TO LVIA CONSULTATION LETTER NOVEMBER 2021	80
A3.3.6	AVIATICA DISCUSSION WITH WALES AIR AMBULANCE REGARDING REDUCED LIGHTING SCHEME- OCTOBER 2021	14	A3.3.28	CORIOLIS, PELL FRISCHMANN AND SWTRA MEETING MINUTES REGARDING Y BRYN WIND FARM– SEPTEMBER 2020	81
A3.3.7	MINISTRY OF DEFENCE LETTER TO AVIATICA REGARDING Y BRN WIND FARM – OCTOBER 2021	17	A3.3.29	SWTRA MEETING MINUTES JANUARY 2022	82
A3.3.8	NP CONSULTATION WITH NPTCBC REGARDING TRAFFIC IMPACT ASSESSMENT – NOVEMBER 2021	18	A3.3.30	NP CORRESPONDENCE WITH NPTCBC REGARDING TRAFFIC AND TRANSPORT - NOVEMBER 2021	83
A3.3.9	MINISTRY OF DEFENCE CONSULTATION WITH AVIATICA REGARDING LOW FLY ZONES– JANUARY 2022	22	A3.3.31	CORIOLIS EMAIL TO NPTCBC AND BCBC CONFIRMING PLANNING PERFORMANCE AGREEMENTS (PPA) ARE SIGNED – FEBRUARY 2022	87
A3.3.10	NP / UK SEARCH AND RESCUE(SAR) DISCUSSIONS REGARDING REDUCED LIGHTING SCHEME – AUGUST 2021	23	A3.3.32	LETTER TO LPAS AND NRW EXPLAINING REDUCED LIGHTING SCHEME AND RATIONALE FOR VIEWPOINTS – INCLUDES AVIATION LIGHTING ZTVS – FEBRUARY 2022	95
A3.3.11	NP / UK SEARCH AND RESCUE(SAR) DISCUSSIONS REGARDING REDUCED LIGHTING SCHEME – NOVEMBER 2021	25	A3.3.33	WHITE CONSULTANTS (REPRESENTING NPTCBC) RESPONSE TO LVIA CONSULTATION LETTER NOVEMBER 2021 (RECEIVED FROM NPTCBC 8 TH MARCH 2022)	95
A3.3.12	NATIONAL AIR TRAFFIC SERVICE (NATS) OBJECTION TO Y BRYN – OCTOBER 2021	26	A3.3.34	NRW RESPONSE TO AVIATION LIGHTING SCHEME AND RATIONALE FOR VPS LETTER FROM NP MARCH 2022	110
A3.3.13	NATS REISSUED TECHNICAL AND OPERATIONAL ASSESSMENT (TOPA)– NOVEMBER 2021	26	A3.3.35	NP RESPONSE TO NRW REGARDING REDUCED LIGHTING SCHEME AND RATIONALE FOR VPS (INCLUDES CAA LETTER APPROVING REDUCED LIGHTING SCHEME) MARCH 2022	111
A3.3.14	NATIONAL POLICE AIR SERVICE APPROVAL OF REDUCED LIGHTING SCHEME – NOVEMBER 2021	34	A3.3.36	CIVIL AVIATION AUTHORITY (CAA) CONSULTATION ON REDUCED LIGHTING SCHEME – FEBRUARY 2022	112
A3.3.14	AVIATICA REDUCED LIGHTING SCHEME REPORT SUBMITTED TO CIVIL AVIATION AUTHORITY – DECEMBER 2021	35	A3.3.37	AIRBOURNE SOLUTIONS – MAY 2022	113
A3.3.15	CONSULTATION WITH CARDIFF AIRPORT REGARDING AIR TRAFFIC SERVICES - DECEMBER 2021	46	A3.3.38	NRW RESPONSE TO NP LETTER REGARDING REDUCED LIGHTING SCHEME AND RATIONALE FOR VPS APRIL 2022	115
A3.3.16	GLAMORGAN GWENT ARCHAEOLOGICAL TRUST (GGAT) CONSULTATIONS	47	A3.3.39	NP RESPONSE TO NRW LETTER REGARDING LIGHT PROPAGATION REPORT - APRIL 2022	115
A3.3.17	GGAT EMAIL COMMUNICATIONS – JUNE -SEPTEMBER 2021	48	A3.3.40	NRW RESPONSE TO NP EMAIL CONTAINING PROFESSOR BEST REPORT – APRIL 2022	130
A3.3.18	MEETING WITH LLYNFI HISTORICAL SOCIETY – JULY 2021	49	A3.3.41	NP RESPONSE TO NRW REQUEST FOR ILLUSTRATIVE EXAMPLES OF AVIATION LIGHTING EFFECTS	131
A3.3.19	MEETING WITH MARGAM PARK NPT OFFICERS – NOVEMBER 2021	50	A3.3.42	NPTCBC AVIATION LIGHTING RESPONSE – MAY 2022	131
A3.3.20	BRIDGEND CBC LVIA CONSULTATION LETTER – OCTOBER 2021	50	A3.3.43	NOISE LIMITS NOTE TO LOCAL PLANNING AUTHORITIES (LPAS) - APRIL 2022	132
A3.3.21	NPTCBC LVIA CONSULTATION LETTER – OCTOBER 2021	68	A3.3.44	NOISE CORRESPONDENCE WITH LPA – APRIL 2022	138
			A3.3.45	MEMO FROM DICK BOWDLER, ACOUSTIC CONSULTANT – APRIL 2022	139
			A3.3.46	PUBLIC RIGHT OF WAY (PROW) LETTER FROM NP TO NPTCBC AND BCBC – APRIL 2022	140
			A3.3.47	NPTCBC RESPONSE TO PROW LETTER – MAY 2022	142
			A3.3.48	BRIDGEND RESPONSE TO PROW LETTER- MAY 2022	143
			A3.3.49	SOLTYS BREWSTER LETTER EXPLAINING APPROACH TO INCLUDING FORESTRY IN SLVIA CHAPTER AND VISUALS TO NRW – JUNE 2022	144

A3.3.50	NRW RESPONSE TO SOLTYS BREWSTER FORESTRY IN VISUALS AND CHAPTER LETTER AND NP ILLUSTRATIVE EXAMPLES OF AVIATION LIGHTING- JUNE 2022	149
A3.3.51	HEADLAND EMAIL TO CADW REQUESTING PRE-CONSULTATION VIEW ON CULTURAL HERITAGE ASIDOHL – JULY 2022	149
A3.3.52	CADW RESPONSE TO HEADLAND REQUEST FOR ASIDOHL COMMENTS– AUGUST 2022	150
A3.3.53	HEADLAND RESPONSE TO CADW ON ASIDOHL COMMENTS – AUGUST 2022	151
A3.3.54	NP REQUEST TO NRW FOR PRE-CONSULTATION COMMENTS ON Y BRYN ES – MAY 2022	151
A3.3.55	NRW RESPONSE TO NP REQUEST FOR PRE-CONSULTATION COMMENTS ON Y BRYN ES	152
A3.3.56	NP RE-REQUEST FOR PRE-CONSULTATION COMMENTS ON Y BRYN ES – AUGUST 2022	153
A3.3.57	NPTCBC PRE CONSULTATION ON Y BRYN ES – SEPTEMBER 2022	153
		153
A3.3.58	NPTCBC PRE CONSULTATION COMMENTS ON Y BRYN ES – SEPTEMBER 2022	154
		155
A3.3.59	NPTCBC PRE CONSULTATION COMMENTS ON Y BRYN ES ECOLOGY – SEPTEMBER 2022	157
A3.3.60	NPTCBC PRE CONSULTATION BIODIVERSITY COMMENTS ON ES – SEPTEMBER 2022	158
A3.3.61	NPTCBC PRE CONSULTATION COMMENTS ON Y BRYN ES – SEPTEMBER 2022	159
	NP PRE CONSULTATION WITH BCBC ON DRAFT ASSESSMENTS -SEPTEMBER 2022	162
A3.3.62	NP REQUEST FOR PRE-APPLICATION ADVICE FOR SUDS - BCBC – OCTOBER 2022	167
	1. BCBC - SUDS SCHEME APPLICATION FOR SUDS APPROVING BODY (SAB) APPROVAL – OCTOBER 2022	168
A3.3.63	NP CONSULTATION WITH BCBC FOR PRE-APPLICATION ADVICE ON SUDS APPROVING BODY (SAB) APPROVAL -OCTOBER 2022	178
A3.3.64	NP REQUEST FOR PRE-APPLICATION ADVICE FOR SUDS - NPTCBC – OCTOBER 2022	182
	ATTACHMENTS IN THE EMAIL CONTAINED:	183
1.	NPTCBC - SUDS SCHEME APPLICATION FOR SUDS APPROVING BODY (SAB) APPROVAL – OCTOBER 2022	183
2.	SUPPORTING DOCUMENTATION	192
A3.3.65	NRW EMAIL RESPONSE TO CHARGED PRE-APPLICATION ADVICE REQUEST – OCTOBER 2022	193
A3.3.66	NRW RESPONSE TO CHARGED PRE-APPLICATION ADVICE REQUEST – OCTOBER 2022	193
A3.3.67	NPTCBC PRE-APPLICATION ADVICE RESPONSE TO NP –NPTCBC – JANUARY 2023	199
A3.3.68	AVIATICA CONSULTATION WITH NPAS ON REVISED LIGHTING SCHEME – NPAS – FEBRUARY 2023	200
A3.3.69	AVIATICA CONSULTATION WITH BRISTOW GROUP ON REVISED LIGHTING SCHEME – BRISTOW GROUP – MARCH 2023	201
A3.3.70	AVIATICA CONSULTATION WITH CAA ON REVISED LIGHTING SCHEME – CAA – MARCH 2023	202

A3.3.71	TABLE OF DESIGN FREEZE NUMBERING AND THE OLD TURBINE NUMBERING USED BY CAA IN THEIR APPROVAL FOR THE AVIATION LIGHTING SCHEME	203
A3.3.72	AVIATICA CONSULTATION WITH THE CAA – APRIL 2023	204
A3.3.73	ACCEPTANCE OF NOTIFICATION FROM PEDW – MAY 2023	205

Design 2: Scoping Layout – January 2021

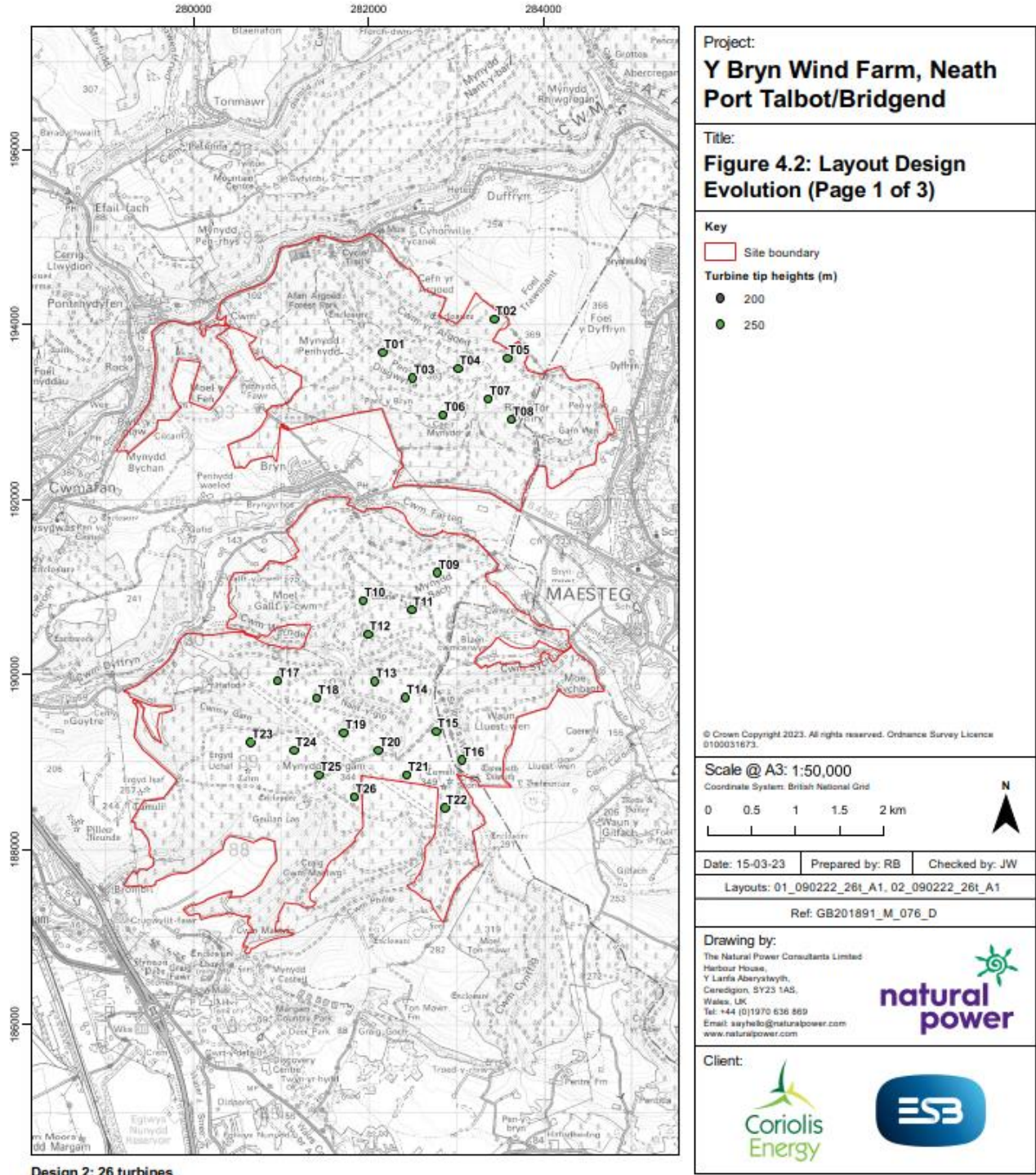


Figure A3.3.1: Scoping layout for Y Bryn Wind Farm

A3.3 CONSULTEE COMMUNICATIONS

A3.3.1 NEATH PORT TALBOT COUNTY BOROUGH COUNCIL (NPTCBC) – RESPONSE TO NATURAL POWER (NP) ECOLOGY SCOPING COMMENTS – JUNE 2021

30 June 2021



Rebecca Sharp
Countryside & Wildlife (Biodiversity Unit)
Neath Port Talbot CBC
Civic Centre
Port Talbot
SA13 1PJ

Local Office
Harbour House
Y Lanfa
Aberystwyth
SY23 1AS
WALES
UK

Registered Office
The Natural Power Consultants Limited
The Green House
Forrest Estate, Dalry,
Castle Douglas, Kirkcudbrightshire,
DG7 3XS

sayhello@naturalpower.com
Reg No: SC177881

Y Bryn Wind Farm

Dear Rebecca,

This letter is in relation to the proposed Y Bryn Wind Farm (reference: P2021/0057).

Thank you for the comments provided by NPTCBC earlier in the year regarding the Scoping Report for this project, and in particular those related to Ecology and Ornithology. These were very useful in directing the remainder of our baseline survey programme and shall, of course, be used to inform the contents of the Environmental Impact Assessment.

Concerning your consultation responses there were a number of points relating to Ecology and Ornithology for which NPTCBC required further information. I apologise for the time that has passed, but I would now like to provide you with the information that you requested. I have listed your relevant scoping comments in the table below, alongside our responses to these comments. Where we would be grateful of further clarification from you, this has been highlighted in the final column of the table. I appreciate there is a lot of content here but would be grateful if you could give this your attention once again.

There are a few recommendations that you have provided which differ from the standard survey guidance with which we are familiar and have extensive experience. In some of these cases I believe following the existing guidance is the most appropriate approach. I have provided explanations for our methods within the table; however, I would be happy to talk through these issues with you.

I would be very grateful if you could provide further comment as necessary, so that we are in agreement ahead of undertaking the EIA. Please do get in touch if you require further information/would like to discuss anything further.

Yours sincerely,



Graeme Garner
Senior Environmental Consultant

30 June 2021



Scoping comment		Response	Further comment required by NPTCBC?
Designated Sites			
1.	Incomplete list of SINC's used.	The SINC (Sites of Importance for Nature Conservation) list was obtained from South-East Wales Biological Records Centre (SEWBRc), which hold a full list of all named sites. The list of sites presented shall be re-examined to prevent any omissions in the Environmental Impact Assessment (EIA).	No
2.	All sites that meet SINC criteria are considered a SINC and therefore should be in avoidance mitigation.	There is acknowledgement that the results of baseline surveys could determine parts of the development site meet SINC criteria, if the measures used by the Local Planning Authority are applied. If NPTCBC have specific detailed criteria for the selection of SINC's in this area, we would be grateful for a link to this publication to help in this assessment. Otherwise we shall assume that the same approach is used as that described in the document "Criteria for the Selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff (the 'Mid-Valleys Area')".	Yes
3.	Designated sites within 10 km should be scoped in.	Our desk study for the scoping report used search areas as follows: SACs (Special Areas of Conservation)/SPAs (Special Protection Areas): 10km; SSSIs (Sites of Special Scientific Interest): 5km; LNRs (Local Nature Reserves) and SINC's: 2km. The inclusion of all designated sites within 10km would not be in keeping with the principle of proportionate EIA, as recommended by CIEMM (Chartered Institute of Ecology and Environmental Management), as many of these sites will have no connectivity or route to impact with the development site. Please can you clarify the level of designated site that should be scoped in if using a search radius of 10 km: e.g. sites of international, national or local interest; and whether the same criteria applies to both ornithological and ecological listed features?	Yes
Data Collection			
4.	NPTC and the Local Nature Partnership should be contacted for records of key species.	NPT Nature Partnership were contacted and have confirmed that all records are held by SEWBRc. If NPTCBC hold additional records, which are not available through SEWBRc nor the Local Nature Partnership, we would appreciate appropriate contact details so that this information can be sourced.	Yes
Survey Methods			
5.	Phase 1 survey undertaken late in season, particularly in regard to woodland flora.	The Phase 1 survey undertaken in 2020 was carried out within the period recommended in guidance, including the NPT Biodiversity in Planning document (which gives the time period of May to September). However, this comment has been acknowledged and the NVC surveys undertaken in 2021 has been completed in June; earlier than was originally scheduled.	No
6.	Clarification required as to the area covered by the NVC survey. NVC survey should include areas, such as track edges, not considered habitat of	The NVC survey has covered turbine locations (turbines and crane pads), tracks (all proposed new and upgraded tracks linked to site) plus other associated infrastructure (such as construction compounds). A survey area of 250m around these features has been used. The survey has not been restricted to areas previously highlighted as being of conservation value. Should layout changes be made post-survey, additional work shall be undertaken to cover these areas, if required.	No



30 June 2021



	high conservation value.		
7.	Clarification required as to the robustness of honey-buzzard surveys	The personnel are very experienced raptor surveyors with previous experience of monitoring honey-buzzard in this area. Surveyors include a contributor to the survey manual <i>Raptors: a field guide to survey & monitoring</i> . High survey effort is being completed over two survey seasons (May to August), focussing on the main period of detection (July/August). Surveys include long periods of watching areas of suitable habitat for potential breeding birds and include numerous visits. Such surveys are in addition to the formal vantage point surveys. Full details shall be provided in the Environmental Statement (ES).	No
8.	Breeding bird surveys started late and may have missed early nesters.	This is acknowledged. All bird surveys are being repeated for a second breeding season. The surveys in 2021 have ensured that the full breeding season receives adequate survey coverage.	No
9.	The approach to passerines, especially breeding passerines, is not considered adequate.	We are following the latest NatureScot guidance (2017), which states that surveys for woodland passerine species are not required (except in the case of Schedule 1 breeding species of restricted distribution, such as redwing and crested tit (not applicable to Wales)). Additionally, guidance does not recommend the inclusion of passerines during surveys of moorland/open ground areas. However, in acknowledgement of these comments, our breeding bird surveys in 2021 include the recording of passerines in open-ground areas and the recording of species lists for the adjacent forested areas. This data shall inform the Ecological Impact Assessment (EclA), alongside the other data available (e.g. habitat data and desk study records). However, woodland point counts are not being undertaken, as in our experience the additional data obtained does not enable a more robust assessment of impacts on passerines to be undertaken. Similarly, we would like to also follow current survey guidance in not undertaking winter walkover surveys. The habitat on site (an upland area of forestry with only small areas of open ground) does not suggest that a different approach to the standard guidance be required, to undertake proportionate EIA. Specifically regarding crossbills (mentioned in the NPTCBC response), NatureScot guidance states surveys “may need to be taken into account in commercial forestry sites in relation to species protection plans, but any surveys required would be undertaken prior to construction after consent of the proposal”. This is the approach that we propose to take at Y Bryn. Are NPTCBC accepting of this approach to bird surveys?	Yes
10.	Passerine disturbance/displacement should not be scoped out.	Passerines are not considered to be significantly affected by wind farms at a population level and most species highlighted in the desk study as being on site are species with a widespread distribution. CIEEM guidance for proportionate EIA would suggest that the inclusion of <u>all</u> passerine species in the ES would therefore not be appropriate. In order to scope in this potential impact, would NPTCBC be content with the EclA only including passerines recorded during baseline surveys and which are Schedule 1, Annex I, Schedule 7 or BoCC red-listed; this already encompassing a large number of species?	Yes
11.	Walked bat survey transects/bat vantage point surveys are required as per NatureScot guidance.	Bat roost surveys and static detector surveys are being undertaken, as recommended in NatureScot guidance (2019). However, the guidance states that walked transects/ vantage points can be used in addition to these surveys but that they are not a survey requirement and that their use is discretionary. As many bat species do not emerge until >30 mins after sunset, this provides a very short window in which bats may be recorded visually and it is considered unlikely that data obtained in this way shall provide useful data in the case of Y Bryn (a large area of, mostly, upland plantation	Yes



30 June 2021



		forestry). Static bat detectors are considered the most appropriate method for determining bat activity across the site. We are completing surveys supplementary to guidance requirements by placing additional static bat detectors at two locations considered most likely to present corridors between Margam and the development site, to investigate possible activity in this area. Are NPTCBC accepting of this approach to bat surveys?	
12.	Additional surveys for great crested newts are recommended in addition to eDNA.	Using a more precautionary approach than was initially planned, all ponds within the vicinity of the development site (including tracks) have been subject to eDNA analysis (carried out by a trained ecologist) irrespective of assessed habitat suitability. The results for all ponds were negative. No further surveys are proposed as eDNA tests are widely accepted for presence/absence, including by NRW, given these surveys (although not perfect) can provide better detection than conventional surveys. The desk study does not suggest the presence of great crested newts in the vicinity of the site. Are NPTCBC accepting of this approach to surveys, given water courses and water bodies shall already be subject to embedded mitigation?	Yes
13.	Invertebrates should not be scoped out and invertebrate surveys should be undertaken.	Based on the Phase 1/NVC surveys and desk study we shall assume that certain butterfly species on the S7 list are present on the development site. As requested, these species shall be scoped back in and included in the EclA. However, we do not believe that undertaking surveys for these ecological features would be proportionate or necessary in order to inform the impact assessment. The impact on invertebrates shall be as a result of changes in habitat and it is on this basis that the assessment shall be undertaken. Are NPTCBC accepting of this approach?	Yes
Contents of Environmental Statement			
14.	Detail required as to how cumulative effects will be assessed.	Cumulative effects shall be assessed for those ecological/ornithological features for which a greater than negligible residual impact is predicted. Existing, consented and submitted wind farm developments (of three or more turbines) within 10 km of the proposed site shall be considered in the assessment, where data is publicly available. Do NPTCBC agree with this approach?	Yes
15.	Most ecological surveys are considered out of date once older than about 18 months.	We believe that the 24 months of baseline survey data collected shall be valid if the planning application is submitted as scheduled. However it is acknowledged that this assumes baseline conditions shall not change significantly within this time. Should the planning application become delayed we shall liaise with NPTCBC as to whether further species-specific surveys require repeating.	No

Design 3: Post-Consultation Layout – July 2021

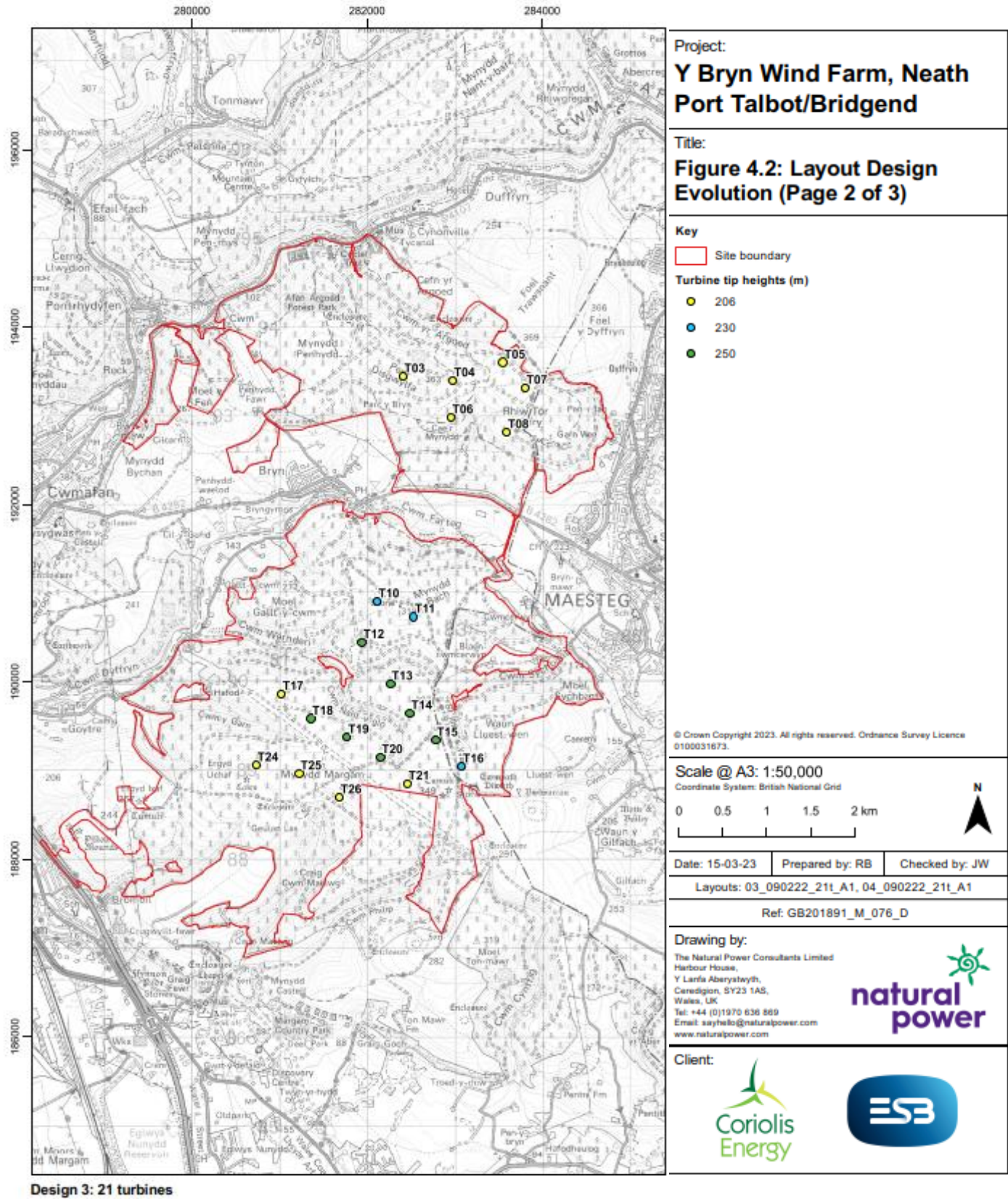


Figure A3.3.2: Post-Consultation layout for Y Bryn Wind Farm

A3.3.2 NPTCBC_BIODIVERSITY CONSULTATION RESPONSE – JULY 2021



Biodiversity Consultation Response

INTERNAL MEMORANDUM

29/07/2021

Planning Application Ref: P2021/0057

Y Bryn
BIODIVERSITY COMMENTS

In reference to the above application an Officer of the Biodiversity Unit has reviewed the application submitted with the following comments and recommendations.

The Countryside and Wildlife Team, 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	☐

Comments and recommendations:

Surveys and other requirements needed prior to determination:

Prior to determination of the application the following information is required to be submitted to inform the decision:

Scoping comment	Response	Further comments NPTC July 2021
Designated sites		
2 All sites that meet SINC criteria are considered a SINC and therefore should be in avoidance mitigation	There is acknowledgement that the results of baseline surveys could determine parts of the development site meet SINC criteria, if the measures used by the Local Planning Authority are applied. If NPTCBC have specific detailed criteria for the selection of SINC in this area, we would be grateful for a link to this publication to help in this assessment. Otherwise we shall assume that the same approach is used as that described in the document "Criteria for the Selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff (the 'Mid-Valleys Area')".	The relevant guidelines can be found here https://www.biodiversitywales.org.uk/File/53/en-GB
3 Designated sites within 10 km should be scoped in.	Our desk study for the scoping report used search areas as follows: SACs (Special Areas of Conservation)/SPAs (Special Protection Areas): 10km; SSSIs (Sites of Special Scientific Interest): 5km; LNRs (Local Nature Reserves) and SINC: 2km. The inclusion of all designated sites within 10km would not be in keeping with the principle of proportionate EIA, as recommended by CIEMM (Chartered Institute of Ecology and Environmental Management), as many of these sites will have no connectivity or route to impact with the development site. Please can you clarify the level of designated site that should be scoped in if using a search radius of 10 km: e.g. sites of international,	We don't know what this is referring to



Biodiversity Consultation Response

		national or local interest; and whether the same criteria applies to both ornithological and ecological listed features?	
Data collection			
4	In relation to records and data in the area, particularly in relation to key species it is also recommended that NPTC and the Local Nature Partnership be contacted for further information.	NPT Nature Partnership were contacted and have confirmed that all records are held by SEWBRc. If NPTCBC hold additional records, which are not available through SEWBRc nor the Local Nature Partnership, we would appreciate appropriate contact details so that this information can be sourced.	Was the Partnership contacted or just the Council? Suggest contacting Charles Hipkin as chair of the Partnership and a local expert botanist crhipkin@googlemail.com
Survey methods			
9	The approach to breeding birds, particularly passerines, is not considered adequate	We are following the latest NatureScot guidance (2017), which states that surveys for woodland passerine species are not required (except in the case of Schedule 1 breeding species of restricted distribution, such as redwing and crested tit (not applicable to Wales)). Additionally, guidance does not recommend the inclusion of passerines during surveys of moorland/open ground areas. However, in acknowledgement of these comments, our breeding bird surveys in 2021 include the recording of passerines in open-ground areas and the recording of species lists for the adjacent forested areas. This data shall inform the Ecological Impact Assessment (EclA), alongside the other data available (e.g. habitat data and desk study records). However, woodland point counts are not being undertaken, as in our experience the additional data obtained does not enable a more robust assessment of impacts on passerines to be undertaken. Similarly, we would like to also follow current survey guidance in not undertaking winter walkover surveys. The habitat on site (an upland area of forestry with only small areas of open ground) does not suggest that a different approach to the standard guidance be required, to undertake proportionate EIA. Specifically regarding crossbills (mentioned in the NPTCBC response), NatureScot guidance states surveys "may need to be taken into account in commercial forestry sites in relation to species protection plans, but any surveys required would be undertaken prior to construction after consent of the proposal". This is the approach that we propose to take at Y Bryn. Are NPTCBC accepting of this approach to bird surveys?	Under the Habitats and Species Regulations 2017 (as amended) we are required to make an assessment of impacts upon wild bird habitat, therefore, winter walkovers are required. The distribution of nightjar would suggest that there is enough non-forested habitat to warrant this. While we welcome the use of the NatureScot guidelines, and appreciate that crossbill are increasing in Wales, we will still require an assessment of the potential impact on this species. Without adequate surveys the precautionary principle will be applied.
10	Passerine disturbance/displacement should not be scoped out	Passerines are not considered to be significantly affected by wind farms at a population level and most species highlighted in the desk study as being on site are species with a widespread distribution. CIEEM guidance for proportionate EIA would suggest that the inclusion of all passerine species in the ES would therefore not be appropriate. In order to scope in this potential impact, would NPTCBC be content with the EclA only including passerines recorded during baseline surveys and which are Schedule 1, Annex I, Schedule 7 or BoCC red-listed; this already encompassing a large number of species?	A S7 species assessment of impacts is required under our LDP policies and the Environment Wales Act 2016. It is also necessary to assess wild bird habitat impacts under the Conservation of Habitat and Species Regulations 2017 (as amended). An assessment of impacts upon all bird habitat should be included in the EIA. The potential effects of direct habitat loss due to land take by turbine bases, tracks and ancillary structures and the potential effects of disturbance and displacement of birds from the proximity of the turbines need to be considered.
11	Walked bat survey transects/bat vantage point surveys are required as per NatureScot guidance	Bat roost surveys and static detector surveys are being undertaken, as recommended in NatureScot guidance (2019). However, the guidance states that walked transects/vantage points can be used in addition to these surveys but that they are not a survey requirement and that their use is discretionary. As many bat species do not emerge until >30 mins after sunset, this provides a very short window in which bats may be recorded visually and it is considered unlikely that data obtained in this way shall provide useful data in the case of Y Bryn (a large area of, mostly, upland plantation forestry). Static bat detectors are considered the most appropriate method for determining bat activity across the site. We are completing surveys supplementary to guidance requirements by placing additional static bat detectors at two locations considered most likely to present corridors between Margam and the development	In line with the NatureScot guidance we would expect walked transect/vantage point surveys to be undertaken for bats in addition to those methods set out. These should particularly be undertaken in areas where roosts are discovered and areas of high activity discovered during the other surveys. This is important to identify any important flight lines and to establish an understanding of bat behaviour at such locations. We would also expect transect surveys to be undertaken to particularly consider impacts upon the bat populations of Margam Park, especially in relation to turbines and other infrastructure (T22, T26 and T25) close to the valleys connecting to the Park (Cwm Phillip, Cwm Beddau, Cwm Maelwg and Cwm Caetreham). An understanding of important flight lines from the Park roosts would be expected to be a key consideration of the EIA. As Margam Park



Biodiversity Consultation Response

		site, to investigate possible activity in this area. Are NPTCBC accepting of this approach to bat surveys?	supports numerous bat roosts of numerous species (14 confirmed species, possible the most diverse site in South Wales if not Wales) it is important to fully understand any potential impacts that the development will have on Park populations. As you have identified areas which could be possible flight lines between Margam Park and the site we will require transects of these areas. We suggest dawn surveys to gather the most information. This information is required in relation to infrastructure fracturing flight lines
12	Additional surveys for great crested newts are recommended in addition to eDNA	Using a more precautionary approach than was initially planned, all ponds within the vicinity of the development site (including tracks) have been subject to eDNA analysis (carried out by a trained ecologist) irrespective of assessed habitat suitability. The results for all ponds were negative. No further surveys are proposed as eDNA tests are widely accepted for presence/absence, including by NRW, given these surveys (although not perfect) can provide better detection than conventional surveys. The desk study does not suggest the presence of great crested newts in the vicinity of the site. Are NPTCBC accepting of this approach to surveys, given water courses and water bodies shall already be subject to embedded mitigation?	Given our experience of GCN in NPT we require additional surveys for the site as we have received both false positive and negative results. NRW, at a recent public enquiry, indicated that they may be changing their advice on eDNA use due to these issues. We also have experience of them in large numbers in sites that would be deemed unsuitable using the habitat suitability assessment. Given the proximity to our coastal populations and recent finding of an upland population these physical surveys are required.
13	Invertebrates should not be scoped out and invertebrate surveys should be undertaken	Based on the Phase 1/NVC surveys and desk study we shall assume that certain butterfly species on the S7 list are present on the development site. As requested, these species shall be scoped back in and included in the EclA. However, we do not believe that undertaking surveys for these ecological features would be proportionate or necessary in order to inform the impact assessment. The impact on invertebrates shall be as a result of changes in habitat and it is on this basis that the assessment shall be undertaken. Are NPTCBC accepting of this approach?	NPT is fast becoming known for having important invertebrate assemblages, particularly on coal spoil, heath and marshy grassland. As previously stated any invertebrate survey should be agreed with us prior to survey.
14	Detail required as to how cumulative effects will be assessed.	Cumulative effects shall be assessed for those ecological/ornithological features for which a greater than negligible residual impact is predicted. Existing, consented and submitted wind farm developments (of three or more turbines) within 10 km of the proposed site shall be considered in the assessment, where data is publicly available. Do NPTCBC agree with this approach?	Yes, but please ensure that the impacts prior to mitigation are set within the wider context as well as specifically on site.

- None

Conditions:

If the application is to be granted it is recommended that the following be conditioned into the permission:

- None

Informatives:

If the application is to be granted it is recommended that the following informative notes be included in the permission:

- None

Licensing Requirements:

- None

A3.3.3 NP RESPONSE TO NPTCBC CLARIFICATION ON SCOPING COMMENTS – SEPTEMBER 2021

Rafe Osborne

To: Graeme Garner
Subject: RE: P2021/0057 Y Bryn

From: Graeme Garner <[redacted]>
Sent: 29 September 2021 09:29
To: Laura Palmer <[redacted]>
Subject: RE: P2021/0057 Y Bryn

Hello Laura,

Apologies for the rather long delay, but I wanted to acknowledge the email I received from you on 29 July regarding the proposed Y Bryn Wind Farm. Many thanks for taking the time to provide further comment on the baseline ecology survey methodologies and the approach to EIA. I appreciate that we have provided comments and ‘comments on comments’ but I just wanted to send this email to summarise our position on the contents of the consultation response.

Your recommendations were useful and the contact details you included for the Chair of the NPT Nature Partnership and the link to guidance for identifying areas that meet SINC criteria, for example, were both appreciated and have been followed up.

We acknowledge your concerns regarding bats and potential flight-lines connecting the site with Margam Park and note your continued recommendation to include bat transect surveys, which are an addition to the standard survey requirements. As a result, we have added walked bat transects to our baseline survey programme and these have been focussed upon the highlighted area that lies between the site and Margam Park.

Regarding ornithology, we acknowledge your comment that the impacts of direct and indirect habitat loss on passerines should be assessed, and we shall therefore include this in the Ornithology chapter of the ES.

There are, however, a couple of elements to our baseline surveys for which we appreciate your advice but remain of the belief that the recommendations you make are not needed in order to carry out the necessary ecological impact assessment.

Regarding winter walkover surveys for birds: We consider that the baseline ornithology surveys undertaken, plus the associated desk study, has been sufficient to adequately characterise the bird community on the site (breeding and resident species). In the winter period non-breeding season vantage point surveys have been undertaken, which recorded any wintering target species present in the vicinity of the site. The upland and forested nature of the site, with any open ground being adjacent to, or surrounded by, forest, is not suitable for holding important aggregations of wintering target species, such as geese or waders, and this has been evident in the VP survey results. With no evidence to suggest the wintering community of birds on site would differ significantly from those resident species recorded during the summer months, we believe that additional winter walkover surveys (which were removed from NatureScot guidance in 2014) would not provide any additional data required to carry out the ecological impact assessment, including the assessment of habitat loss on passerines. Winter walkover surveys shall, therefore, not be carried out.

As previously stated, we shall scope back in invertebrates as an ecological feature for assessment. There is a comment in the consultation response that “any invertebrate survey should be agreed prior to survey”. I would like to confirm that no invertebrate survey shall be undertaken. We remain satisfied that the impact assessment can be made based upon the habitat data and desk study data that we have collated for the site.

Your comment regarding the reliability of eDNA for determining the presence of great-crested newts is understood. We are aware that NRW’s guidance could change in future, however, we have followed their current guidance,

which is that eDNA is an acceptable survey method. Our approach would be to make our assessment on the basis that great-crested newt is absent, as the surveys and desk study suggest. However, any ponds on site that may be directly affected by on site works shall be subject to good practice measures for the protection of amphibians, and great-crested newts would be looked for ahead of such works. If encountered, work would cease and NRW consulted. Thus, we hope that you will be satisfied that great-crested newts shall be adequately protected, should the eDNA results be erroneous, without the need for undertaking complete surveys of all ponds within the site boundary and without holding up the timelines of the development.

Thank you again for you time regarding Y Bryn.

Best regards,

Graeme Garner

Graeme Garner
Senior Environmental Consultant
naturalpower.com
renewable energy consultants

mobile: +[redacted]
email: graemeg@naturalpower.com



Natural Power Consultants Limited is a registered company (SC177881) in Scotland. Our Registered Office is The Greenhouse, Dalry, Castle Douglas, DG7 3XS, UK.
[Disclaimer](#)

Design 4: Post-surveys layout – October 2021

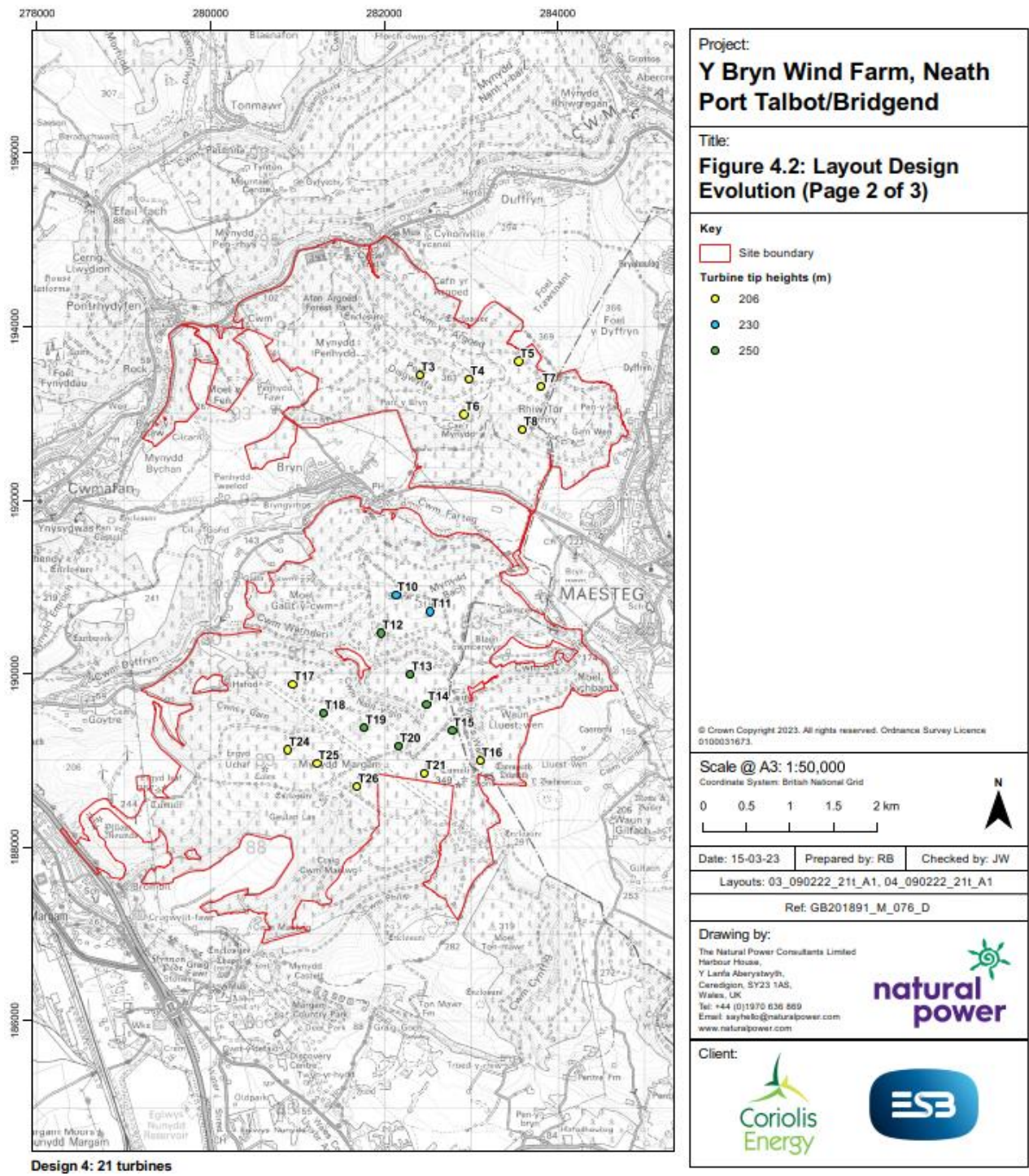


Figure A3.3.3: Post-surveys layout for Y Bryn Wind Farm

2

A3.3.5 NP LETTER TO NPTCBC EXPLAINING APPROACH TO TOURISM – OCTOBER 2021

13 October 2021

Your reference: P2021/0057
Our reference: 1262679



Nicola Lake
Planning
Neath Port Talbot CBC
Civic Centre,
Port Talbot
SA13 1PJ

Local Office

Registered Office

Harbour House Y Lanfa Aberystwyth SY23 1AS WALES UK Tel: +44 (0) 1970 636 869 www.naturalpower.com sayhello@naturalpower.com	The Natural Power Consultants Limited The Green House Forrest Estate, Dalry, Castle Douglas, Kirkcudbrightshire, DG7 3XS Reg No: SC177881
--	--

Y Bryn Wind Farm - Tourism

Dear Nicola

Following your comments on the proposed Y Bryn Wind Farm Scoping Report, which were included within Appendix 1 of the EIA Scoping Direction (dated 08/03/21), please find below our response to your query raised in relation to the Socio-Economic chapter of the Environmental Statement (ES):

Question 30: Are consultees in agreement with the proposed methodology for socio-economic and that tourism is scoped out?

We note your concern on the impact of the proposed Y Bryn Wind Farm on the existing and future growth of tourism within the coastal plane and valley areas, and your request for all potential negative impacts of the development on the socio-economic environment, including tourism, to be fully assessed and where possible mitigated against. We recognise the importance of tourism and its growth to the economy of Neath Port Talbot (NPT).

In the Socio-economic chapter of the Environmental Statement (ES), we will assess the economic baseline of the area, including the importance of the tourism sector, and discuss the potential economic effects of the development, considering construction, operational and decommissioning phases of the proposed development. We will also be assessing the economic effects of infrastructure improvements and mitigation measures designed to maximise the positive impacts of the development. These assessments will include tourism as part of the wider economic landscape.

In the Landscape and Visual Impact Assessment (LVIA) chapter, we will assess the visual impact on specific tourism and recreation receptors such as Margam Park, Maesteg Golf Course and St Illtyd's Way National Trail etc. The potential effect on tourists and visitors to places of historical interest will also be considered in the Cultural Heritage chapter. We are currently liaising with Public Rights of Way (PRoW) Officers in both NPT County Borough Council (CBC) and Bridgend CBC on mitigation and enhancement to PRoW in the proposed development area. This will be reported in the existing infrastructure chapter of the ES. In addition, we are currently exploring mitigation methods and enhancement opportunity for visitors, such as using a smartphone app highlighting the cultural heritage assets within the development area, creation of new mountain biking trails etc

13 October 2021

Your reference: P2021/0057
Our reference: 1262679



Although not a planning consideration, Y Bryn Wind Farm is proposing £8,000 per megawatt (MW) per year of community benefit fund, which could be used for local initiatives, including supporting the tourism sector. Indeed, the use of community benefit fund from wind farm projects has supported tourism initiatives in the locality, including creation of mountain biking trails and supporting the running of centres. This will also be discussed in the ES where appropriate.

To conclude, tourism will be discussed in the various chapters of the ES and won't be scoped out in its entirety, which our scoping report may have suggested, and please be reassured that Natural Power and our client recognise tourism as an important growing sector within NPT.

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

Yours sincerely

Ffion Edwards
Principal Project Manager

A3.3.6 AVIATICA DISCUSSION WITH WALES AIR AMBULANCE REGARDING REDUCED LIGHTING SCHEME- OCTOBER 2021

>From: "Jenkins, Tulki" <[REDACTED]>
>To: Malcolm Spaven <[REDACTED]>
>"Grenfell, James"
><[REDACTED]>
>Subject: RE: CAUTION: External email - Re: Wind farm consultation: Y Bryn,
>South Wales (UNCLASSIFIED)
>Date: Thu, 4 Nov 2021 12:25:34 +0000
>babcock_x-header: UNCLASSIFIED
>
>Classification:UNCLASSIFIED
>
>Hi Malcolm,
>
>Happy with proposal.
>
>If you wish to discuss further feel free to get in touch or stick
>something in the calendar but from my point of view your proposal is
>great and have no concerns. If James is required as a local pilot
>then some co-ordination may be required to catch him when on shift.
>
>Best Wishes
>
>
>Tulki :)
>
>
>
>Tulki Jenkins | Helicopter Landing Site Surveyor
>UK Aviation | Aviation
>Babcock International Group
>Babcock Onshore | Building Se32-33 | Gloucestershire Airport |
>Cheltenham | Gloucestershire | GL51 6SP
>Tel: [REDACTED] | Alt Mob:
>[REDACTED] | mailto:[REDACTED]
>www.babcockinternational.com
>
>-----Original Message-----
>From: Malcolm Spaven <[REDACTED]>
>Sent: 04 November 2021 11:33
>To: Jenkins, Tulki <[REDACTED]>;
>Grenfell, James <[REDACTED]>

1

>Subject: RE: CAUTION: External email - Re: Wind farm consultation: Y
>Bryn, South Wales (UNCLASSIFIED)
>
>Dear Tulki
>
>Many thanks for your email in August and my apologies for the delay
>in responding.
>
>I have attached an annotated version of your suggested lighting
>configuration. This identifies the turbines that we would propose
>to put IR lights on as well as those with visible spectrum
>lighting. As you'll see, there are three turbines in the southern
>block that we would propose not to have any form of lighting since
>they are not on the perimeter of the wind farm.
>
>I would welcome an opportunity to discuss our proposals with
>you. Could we set up a date and time for a call?
>
>Thanks and regards
>
>Malcolm Spaven
>
>
>At 16:51 03/08/2021, Jenkins, Tulki wrote:
>>Classification:UNCLASSIFIED
>>
>>Malcolm,
>>
>>Please find attached drawing. I have marked in blue the lights we would
>>like to meet the standard aviation lighting requirements. In white I
>>have marked towers we would be happy for lower intensity lighting to be
>>used.
>>
>>This layout means that from all potential routings across the site the
>>aircrew should be able to identify a minimum of three lights to allow
>>them to draw a mental triangle of area to avoid. There is a few more
>>lights requested in between the two blocks due to our potential
>>requirement to fly between the two blocks.
>>
>>Best Wishes
>>
>>Tulki
>>
>>
>>
>>Tulki Jenkins | Helicopter Landing Site Surveyor UK Aviation |
>>Aviation Babcock International Group Babcock Onshore | Building Se32-33
>>| Gloucestershire Airport | Cheltenham | Gloucestershire | GL51 6SP
>>Tel: +[REDACTED] | Alt Mob:
>>+[REDACTED] | mailto:[REDACTED]
>>www.babcockinternational.com
>>
>>-----Original Message-----
>>From: Malcolm Spaven <[REDACTED]>
>>Sent: 03 August 2021 14:06
>>To: Grenfell, James <[REDACTED]>

2

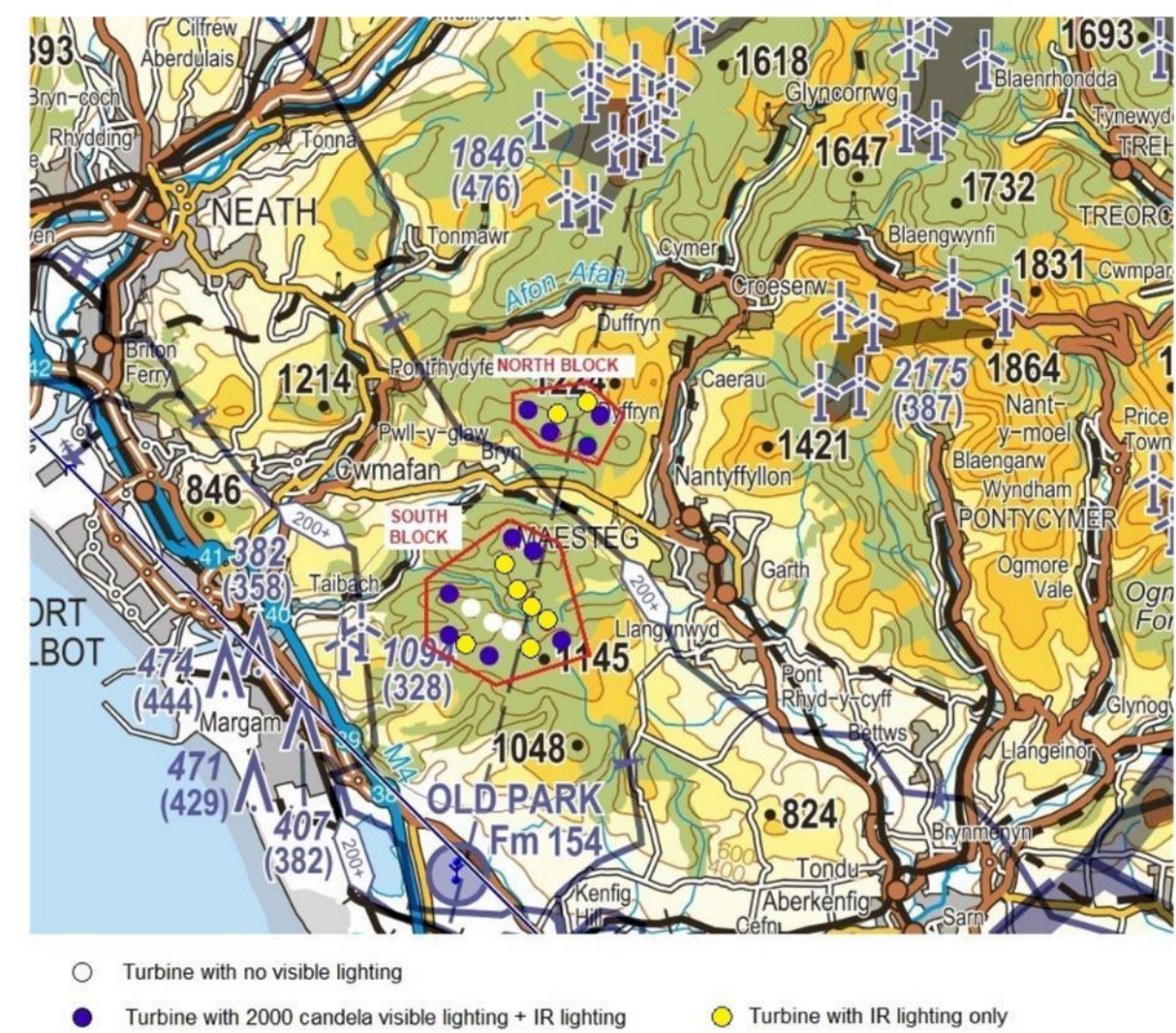
> > Jenkins, Tulki <[REDACTED]>
> > Subject: CAUTION: External email - Re: Wind farm consultation: Y Bryn,
> > South Wales
> >
> > Hi James and Tulki
> >
> > Many thanks for your response.
> >
> > I have attached a chart excerpt showing the location of the wind farm
> > and the current proposed layout. This will consist of:
> >
> > - 6 turbines in the North Block with tip heights of 206m agl
> > - 15 turbines in the South Block with tip heights ranging from 206 to
> > 250m agl
> >
> > Maximum tip heights are estimated to be approximately 1825ft amsl in
> > the North Block and 1875ft amsl in the South Block.
> >
> > We have not done any detailed lighting scheme design work yet because
> > the turbine layout does not lend itself to a straightforward perimeter
> > lighting scheme. I would welcome a discussion with you first on how
> > you operate at night in that area and how we might design a lighting
> > scheme that would meet your needs.
> >
> > If you could take a look at the attached and let me know if you require
> > any more detailed information, perhaps we could then have a phone
> > conversation (or Zoom/Teams as you prefer) to discuss?
> >
> > Many thanks
> >
> > Malcolm
> >
> > At 13:59 03/08/2021, Grenfell, James wrote:
> >
> > > Hi Malcom
> > >
> > >
> > > Thanks for your email. I have included our company landing site
> > > surveyor Tulki Jenkins who may be able to help with your enquiry.
> > >
> > >
> > >
> > > Kind regards
> > >
> > > James
> > >
> > >
> > >
> > > []
> > >
> > >
> > > James Grenfell | Regional Managing Pilot (Wales) UK Aviation |
> > > Aviation Babcock International Group Cardiff Heliport | Foreshore
> > > Road | Cardiff
> > > | CF10 4LZ

3

> > Mob: [REDACTED]
> > <mailto:[REDACTED]>
> >
> > nternational.com
> > www.babcockinternational.com
> >
> > []
> >
> >
> > P Please consider the environment before printing this email
> >
> >
> > -----
> >
> >
> > -----
> > From: Malcolm Spaven <[REDACTED]>
> > Sent: 23 July 2021 11:59:19
> > To: Grenfell, James
> > Subject: CAUTION: External email - Wind farm consultation
> >
> > Dear James
> >
> > I am an aviation consultant working for Coriolis Energy on their
> > plans for a wind farm at Y Bryn, between Maesteg and Port Talbot.
> >
> > The turbines will be more than 150m high to blade tips and will
> > therefore be subject to the lighting requirements of ANO Article 222.
> > Due to the sensitivity of additional night-time lighting in rural
> > areas, we are exploring the possibilities for reduced lighting
> > provision, subject to CAA approval.
> >
> > We have extensive experience of this type of work at sites in
> > Scotland and have had good collaboration with your Babcock colleagues
> > at the Police Scotland ASU, Scotland's Charitable Air Ambulance and
> > (prior to the Gama takeover) the Scottish air ambulance service.
> >
> > Initially I would like to send you a graphic showing the site
> > location and proposed turbine layout. Perhaps once you've had a look
> > at that we could have a chat?
> >
> > I look forward to hearing from you.
> >
> > Thanks and regards
> >
> > Malcolm Spaven
> >
> > _____
> > Aviatca
> > Reservoir House
> > Gladhouse
> > Midlothian EH23 4TA
> > Tel: [REDACTED]
> >
> >
> >

4

Graphic sent by Malcolm Spaven 4th November 2021



Graphic sent by Wales Air Ambulance 3rd August 2021



A3.3.7 MINISTRY OF DEFENCE LETTER TO AVIATICA REGARDING Y BRN WIND FARM – OCTOBER 2021



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

Malcolm Spaven
Aviatica
Reservoir House
Gladhouse
Midlothian
EH23 4TA

MOD Telephone: [REDACTED]
E-mail: [REDACTED]

By email Only

Application Ref: 3264571
Our Reference: DIO10052675

6 October 2021

Dear Malcolm,

Site Name: Y Bryn Wind Farm

Scoping Opinion Request – Y Bryn Wind Farm near Maesteg, South Wales.

Thank you for consulting the Ministry of Defence (MOD) on the above request for a Scoping Opinion for the proposed construction and operation of Y Bryn Wind Farm received by this office on 09th September 2021.

I am writing to inform you that the MOD has concerns about this proposed development.

We have assessed this proposal on the basis that there will be 21 turbines at 250.00 metres in height from ground level to blade tip and located at the grid references detailed in the table below:

Turbine	Easting	Northing
3	282409	193443
4	282978	193397
5	283552	193600
6	282921	192990
7	283805	193313
8	283594	192814
10	282115	190906
11	282531	190735
12	281963	190469
13	282268	189977
14	282490	189646
15	282783	189343
16	283097	188990

17	280945	189877
18	281326	189574
19	281770	189376
20	282166	189165
21	282459	188852
24	280888	189123
25	281227	188966
26	281683	188698

It has been identified that this development will have the following impacts upon defence operations:

Military Low Flying Training

The airspace over the UK land mass is used to provide the UK Military Low Flying System to deliver essential military low flying training. The proposed development will occupy Low Flying Area 7 (LFA 7) within which military fixed wing aircraft are permitted to fly down to 250 feet (76.2 metres) above terrain features. The development proposed will cause a potential obstruction hazard to these military low flying training activities. To address this impact, it would be necessary for the development to be fitted with MOD accredited in accordance with the requirements of the Civil Aviation Authority, Air Navigation Order 2016.

MOD Safeguarding wishes to be consulted and notified about the progression of this proposal and any subsequent application(s) that may be submitted relating to it to verify that it will not adversely affect defence interests.

I trust this adequately explains our position on this matter. Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

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

Yours sincerely

[REDACTED]

Teena Oulaghan
Safeguarding Manager

A3.3.8 NP CONSULTATION WITH NPTCBC REGARDING TRAFFIC IMPACT ASSESSMENT – NOVEMBER 2021

Megan Griffiths

From: Mhairi Bowley
Sent: 26 November 2021 12:14
To: Terry J. Davies; Mhairi Bowley
Cc: Justin W. Griffiths; Joanna Weeks; Lucy Freeman
Subject: RE: Y Bryn Wind Farm TIA
Attachments: Speed-Summary-00001136-2016_12_02-2016_12_15.xlsx; traffic count.jpg

Good Morning,

Thank you again for the previously provided data relating to the Goytre route for use with the Y Bryn Wind Farm EIA submission we are preparing. Using the COBA method we have converted this to an equivalent AADT value and then applied growth factors to bring it up to the year 2019 which is consistent with the other DfT data available. Unfortunately there is no identified HGV value available due to the nature of the survey undertaken. We would therefore propose to estimate this value, see below for the summary table of the data at each of the routes being considered. Taking an average of the other route HGV values gives 1.3% which can be applied. However, we are aware that there is an environmental weight limit on the structure in Pen-y-case and due to the nature of the road the actual HGV usage may be lower.

Would you be in agreement to our assumption that 1.3% of traffic on the Goytre Road can be classed as HGV or would an alternative value be preferable.

Many thanks

Mhairi

Baseline and Projected AADT				
2019				
Location	Description of location	Annual Average Daily Traffic (Total Traffic)	Annual Average Daily Traffic (HGV Traffic)	% HGVs
1136	Goytre Road	1888	24	1.3
30655	A4107 (Goytre Road to B4282)	5997	62	1.0
950829	B4282 (Maesteg to Site Entrance)	9145	131	1.4
50634	A4107 (North of B4282)	4029	66	1.6

622	A4063 to Maesteg	6968	72	1.0
-----	------------------	------	----	-----

From: Terry J. Davies
Sent: 09 March 2021 10:14
To: Mhairi Bowley [NPC]
Cc: Justin W. Griffiths; Joanna Weeks
Subject: RE: Y Bryn Wind Farm TIA

Mhairi,

My apologies for the late response. The Authority has information for the Goytre route and I would advise that it would be acceptable to use the appropriate growth factor to uplift these figures. Please see attached.

Regards

Terry Davies

SAB & Highway Development Senior Engineer -Team Leader /SAB a Uwch Beiriannydd Datblygu Priffyrdd – Arweinydd Tam
SAB & Highway Development Control Section/SAB a Rheoli Datblygu Priffyrdd Adran
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot
Tel/Ffôn:

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



DARPARU GWELL GWASANAETHAU AR-LEIN | DELIVERING BETTER SERVICES ONLINE





This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately. Please note also that there is no guarantee that this email or any attachment is virus free or has not been intercepted or amended.
Mae'r e-bost hon ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeirirwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn mewn camgymeriad, dylech hysbysu'r person a anfonodd yr e-bost ar unwaith. Hefyd, sylwer nad oes unrhyw sicrwydd nad yw'r e-bost hwn neu unrhyw ymgysylltiad yn rhydd o firus ac nad yw chwaith wedi'i rynnw-gipio na'i newid.

From: Mhairi Bowley
Sent: 08 March 2021 17:36

To: Terry J. Davies <[REDACTED]>
Subject: RE: Y Bryn Wind Farm TIA

Good afternoon Terry,

I was wondering if you had had the opportunity to seek clarification as to whether there are any existing traffic count information which could be utilised for the Y Bryn Traffic Impact Assessment?

Many thanks,

Mhairi

Mhairi Bowley
Design Project Engineer
naturalpower.com
renewable energy consultants

tel: +[REDACTED]
mobile: +[REDACTED]
email: [REDACTED]



From: Terry J. Davies <[REDACTED]>
Sent: 19 February 2021 12:21
To: Mhairi Bowley <[REDACTED]>
Subject: RE: Y Bryn Wind Farm TIA

Noted

From: Mhairi Bowley <[REDACTED]>
Sent: 19 February 2021 11:52
To: Terry J. Davies <[REDACTED]>
Cc: Nicola Lake <[REDACTED]>; Steven Jenkins <[REDACTED]>
Subject: RE: Y Bryn Wind Farm TIA

Terry,

For clarification, as noted in my previous email, these proposed routes are not for the transport of the AILs. The routes proposed and corresponding traffic assessment will be for the daily construction traffic ie HGVs/LGVs/cars only.

Many thanks,

Mhairi

Mhairi Bowley
Design Project Engineer
naturalpower.com
renewable energy consultants

tel: +[REDACTED]
mobile: +[REDACTED]
email: [REDACTED]



From: Terry J. Davies <[REDACTED]>
Sent: 19 February 2021 11:06
To: Mhairi Bowley <[REDACTED]>
Cc: Nicola Lake <[REDACTED]>; Steven Jenkins <[REDACTED]>
Subject: RE: Y Bryn Wind Farm TIA

Mhairi

The current policy for AIL relating to windfarms in the Authority would require a trial run for Access point 1& 2, access points 3&4 would be depending on the size of the blades. There will also be a requirement for bridge structures to be assessed and condition surveys however what part of the process would be appropriate is for consideration. In terms of traffic count information I will forward to the relevant section to see if we have any available data and advise you accordingly. I would advise that the Mynydd Brombil windfarm accessed via Maesteg at access point 5 which might indicate difficulties with your chosen routes.

Regards

Terry Davies

SAB & Highway Development Senior Engineer -Team Leader /SAB a Uwch Beiriannydd Datblygu Priffyrdd – Arweinydd Tam
SAB & Highway Development Control Section/SAB a Rheoli Datblygu Priffyrdd Adran
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot
Tel/Ffôn: [REDACTED]

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



DARPARU GWELL GWASANAETHAU AR-LEIN | DELIVERING BETTER SERVICES ONLINE



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately. Please note also that there is no guarantee that this email or any attachment is virus free or has not been intercepted or amended.

Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeirwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn mewn camgymeriad, dylech hysbysu'r person a anfonodd yr e-bost ar unwaith. Hefyd, sylwer nad oes unrhyw sicrwydd nad yw'r e-bost hwn neu unrhyw ymgysylltiad yn rhydd o firws ac nad yw chwaith wedi'i ryng-gipio na'i newid.

From: Mhairi Bowley [REDACTED]
Sent: 19 February 2021 09:13
To: Terry J. Davies [REDACTED]
Subject: RE: Y Bryn Wind Farm TIA

Good morning,

I have attached a sketch which shows the site entrances being considered, yellow pins numbered 1-5, and the preferred routes to these locations. **Please note that these routes are for daily construction traffic only and not Abnormal load delivery.**

Whilst it is unknown at present exactly where material deliveries will be received from, we have assumed that the majority will travel via the M4 and will exit at Junction 40.

- ☐ Access point 1: Traffic will travel from Junction 40 onto the A4107 then onto Dyffryn Road Goytre Road
- ☐ Access point 2: Traffic will travel from Junction 40 onto the A4107, it will continue on the A4107 then the B4282 via Bryn
- ☐ Access points 3 and 4: Traffic will travel from Junction 40 onto the A4107, it will continue on the A4107
- ☐ Access point 5: will cater for deliveries being made from the east of the site, passing through Maesteg.

Traffic count information during Covid is indeed a point we would like to discuss further with yourselves to ensure we are in agreement prior to assessment commencing. Prior to Covid our approach would be to identify appropriate locations and undertake traffic counts. Understandably there is uncertainty regarding these counts at present due to the current lockdown status and therefore potential reduced flows. As an alternative we have reviewed the DfT website and located areas where they have traffic counts, either manual or interpolated, which may be appropriate for our use. These locations are the green pins on the sketch named with the DfT site number. Site 30655 on Route 2 and 3 was a manual count undertaken in 2019. Site 78497 on Route 3 is an estimated count interpolated to 2019. We would propose to use the DfT traffic count information for routes 2, 3, 4 and 5.

Route 1 does not have an appropriate current location. Site 811768 (red pin) is available but does not form part of our route. We therefore would ask if the you hold any traffic count information which could be used for this route? If not, we would propose to undertake a traffic count for this route at a location agreed with yourselves. April is the next neutral month for undertaking the count and therefore is the earliest this would be undertaken.

Once you have had opportunity to review the information can you please advise if you are in agreement with our approach.

Many thanks,

Mhairi

Mhairi Bowley
Design Project Engineer
naturalpower.com
renewable energy consultants

tel: [REDACTED]
mobile: [REDACTED]
email: [REDACTED]



From: Terry J. Davies [REDACTED]
Sent: 19 February 2021 07:56
To: Mhairi Bowley [REDACTED]
Subject: RE: Y Bryn Wind Farm TIA

Mhairi,

Prior to any discussion it would be useful to have your preferred routes so that I can speak to relevant officers. I would also be obliged on how you intend dealing with traffic count information during this period of Covid 19 lockdown.

Regards

Terry Davies

SAB & Highway Development Senior Engineer -Team Leader /SAB a Uwch Beiriannydd Datblygu Priffyrdd – Arweinydd Tam
SAB & Highway Development Control Section/SAB a Rheoli Datblygu Priffyrdd Adran
Neath Port Talbot County Borough Council/ Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot
Tel/Ffôn: [REDACTED]

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



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately. Please note also that there is no guarantee that this email or any attachment is virus free or has not been intercepted or amended.

Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeirwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn mewn camgymeriad, dylech hysbysu'r person a anfonodd yr e-bost ar unwaith. Hefyd, sylwer nad oes unrhyw sicrwydd nad yw'r e-bost hwn neu unrhyw ymgyssylltiad yn rhydd o firws ac nad yw chwaith wedi'i ryng-gipio na'i newid.

From: Mhairi Bowley [REDACTED]
Sent: 18 February 2021 16:19
To: Terry J. Davies [REDACTED]
Subject: Y Bryn Wind Farm TIA

Good afternoon,

I have been given your name to contact regarding the proposed Y Bryn Wind Farm. We have been appointed to assist with the preparation of the Traffic and Transport element of the EIA, I understand that you have seen the Scoping Report submitted for this.

As part of the Traffic and Transport chapter we will be undertaking a traffic impact assessment. I have looked at the area regarding potential access routes to the site and available traffic count information, however would like to please discuss this with yourselves to ensure we are in agreement about what locations and data is used prior to modelling commencing.

Could I please request an online meeting with yourself to discuss our proposed approach and locations being considered. I am available between 9:30am and 2:30pm each day next week if there is a time within that which suits.

Many thanks,

Mhairi

Mhairi Bowley
Design Project Engineer
naturalpower.com
renewable energy consultants

tel: + [REDACTED]
mobile: + [REDACTED]
email: [REDACTED]



Natural Power Consultants Limited is a registered company (SC177881) in Scotland. Our Registered Office is The Greenhouse, Dairy, Castle Douglas, DG7 3XS, UK.
[Disclaimer](#)

Click [here](#) to report this email as spam.

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

A3.3.9 MINISTRY OF DEFENCE CONSULTATION WITH AVIATICA REGARDING LOW FLY ZONES- JANUARY 2022

Page 1 of 9

From: "Oulaghan, Teena C2 (DIO Estates-SafegdgMgr1)"
To: Malcolm Spaven
Subject: RE: RE: 20211006_MOD_Response_Y_Bryn
Date: Fri, 28 Jan 2022 11:48:27 +0000

Hi Malcolm,

Thank you for your email.

As you will be aware MOD assess all applications on a case by case basis and provide advice accordingly. The Y Bryn wind farm development falls within LFA 7 as designated by MOD, within low flying areas it is accurate to state that military fixed wing aircraft are permitted to fly down to 250ft (76.2m) above terrain features. In this case the application site also falls within the Glamorgan Transit Area and as such, as you pointed out, is in an area where military fixed wing aircraft do not routinely operate at low level, however, there may be reason for military fixed wing and rotary aircraft to operate in this area. To confirm our response to the scoping consultation reflects this concern.

In regards to the lighting proposal that you have provided I can confirm that the MOD is content.

Hope this clarifies

Kind regards

Teena Oulaghan

Safeguarding Manager
Estates Safeguarding

St George's House | Defence Infrastructure Organisation Head Office |
DMS Whittington | Lichfield | Staffordshire | WS14 9PY

Mobile Tel:
Website: www.gov.uk/dio/ Twitter: @mod_dio

Read DIO's blog: <https://insidedio.blog.gov.uk/>

Due to covid-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on 07970170934.

-----Original Message-----
From: Malcolm Spaven
Sent: 28 January 2022 10:34
To: Oulaghan, Teena C2 (DIO Estates-SafegdgMgr1)
Subject: RE: RE: 20211006_MOD_Response_Y_Bryn

Thanks Teena

So, just to confirm, can we take it that the statement in your letter of 6 October 2021 that:
"The proposed development will occupy Low Flying Area 7 (LFA 7) within which military fixed wing aircraft are permitted to fly down to 250 feet (76.2 metres) above terrain features. The development proposed will cause a potential obstruction hazard to these military low flying training activities"
no longer applies, since (as I pointed out in my email of the same date) the development in fact lies wholly within the Glamorgan Transit Area, which (along with all other Transit Areas) has always been classified by DIO as an "Area with no military low flying concerns" with respect to wind farm developments.

I look forward to receiving your further response on the proposed lighting scheme for Y Bryn, as submitted to you on 17th December 2021.

file:///C:/Users/44771/AppData/Local/Temp/eudD.htm

15/04/2022

Thanks and regards

Malcolm

At 10:14 28/01/2022, you wrote:
>Good Morning Malcolm,
>
>Sorry for the delay with my response.
>
>I referred your query to LF and having revisited this scoping response
>our LF SME are content as long as the development is lit in accordance
>with the CAA.
>
>Kindest regards
>
>Teena Oulaghan
>
>Safeguarding Manager
>Estates Safeguarding
>
>St George's House | Defence Infrastructure Organisation Head Office |
>DMS Whittington | Lichfield | Staffordshire | WS14 9PY
>
>Mobile Tel:
>Website:
><https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.gov.uk%2Fdio%2F&data=04%7C01%7CTeena.Oulaghan100%40mod.gov.uk%7C8538046c20c34ca706af08d9e249d2db%7Cbe7760ed5953484bae95d0a16dfa09e5%7C0%7C1%7C637789628960667463%7CUnknown%7CTWFPbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwLJCJXVCi6Mn0%3D%7C2000&sd=BKSgKJK6VERBwIFUPve1%2B1GJTWFsQ6DqaYAjQ%2FmS5m0%3D&reserved=0>
>Twitter: @mod_dio
>
>Read DIO's blog:
><https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Finsidedio.blog.gov.uk%2F&data=04%7C01%7CTeena.Oulaghan100%40mod.gov.uk%7C8538046c20c34ca706af08d9e249d2db%7Cbe7760ed5953484bae95d0a16dfa09e5%7C0%7C1%7C637789628960667463%7CUnknown%7CTWFPbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwLJCJXVCi6Mn0%3D%7C2000&sd=o9RKATtYhPiGxGXeadkBTzPp%2BPwUR21pgfBAMkzS0%3D&reserved=0>
>
>
>
>Due to covid-19 I am working from home until further notice.
>
>In line with the latest guidance, I am working offline where possible
>to ease the pressure on the IT network, so I will only be checking
>emails and Skype periodically. This means I might not respond as
>promptly as usual, so if you need my attention more urgently, please
>call me on
>
>-----Original Message-----
>From: Malcolm Spaven
>Sent: 26 January 2022 14:27
>To: Oulaghan, Teena C2 (DIO Estates-SafegdgMgr1)
>Cc: DIO-Safeguarding-Wind (MULTIUSER)
>
>Subject: Fwd: RE: 20211006_MOD_Response_Y_Bryn
>

file:///C:/Users/44771/AppData/Local/Temp/eudD.htm

15/04/2022

A3.3.10 NP / UK SEARCH AND RESCUE(SAR) DISCUSSIONS REGARDING REDUCED LIGHTING SCHEME – AUGUST 2021

>Dear Teena
>
>I hope this finds you well.
>
>We are now moving towards submission of the planning application for Y
>Bryn wind farm (your ref DIO10052675). We are keen to resolve the two
>issues on which I have previously consulted you i.e.
>
>1. Your scoping response re low flying (my email of 6th October 2021
>refers); and
>
>2. The proposed reduced lighting scheme (my email of 17th December
>2021 refers).
>
>I would be grateful if you could confirm that you have all the
>information you require to address those two issues, and advise when we
>can expect to get substantive responses from you on those points.
>
>With thanks and regards
>
>Malcolm
>
>
>>Date: Fri, 17 Dec 2021 12:01:52 +0000
>>To: "Oulaghan, Teena C2 (DIO
>>[REDACTED]
>>From: Malcolm Spaven [REDACTED]
>>Subject: Fwd: RE: 20211006 MOD Response Y Bryn
>>C [REDACTED]
>>
>>
>>Dear Teena
>>
>>Further to my earlier communications on Y Bryn (see below), I would
>>now like to ask you for MoD's response to our proposal for a reduced
>>lighting scheme on the wind farm. This was submitted to the CAA for
>>approval this morning. A copy is attached.
>>
>>As you will see from the proposal, we propose to put
>>MoD-specification infra-red lights on all perimeter turbines. I
>>would be grateful if you could confirm that the MoD is content with this proposed lighting scheme.
>>
>>I hope you have a good Christmas break.
>>
>>Best regards
>>
>>Malcolm
>>
>>>Date: Fri, 19 Nov 2021 11:27:25 +0000
>>>To: "Oulaghan, Teena C2 (DIO
>>>Estates-SafegdgMgr1)" [REDACTED]
>>>From: Malcolm Spaven [REDACTED]
>>>Subject: RE: 20211006 MOD Response Y Bryn
>>>Cc: DIO-Safeguarding-Wind@mod.gov.uk
>>>
>>>Good morning Teena
>>>
>>>Have you been able to get a response yet from your LF adviser on the
>>>issue of wind farms in the Glamorgan Transit Area?
>>>
>>>Many thanks
>>>
>>>Malcolm
>>>

file:///C:/Users/44771/AppData/Local/Temp/eudD.htm

15/04/2022

From: John Sheldon <[REDACTED]>
To: Malcolm Spaven <[REDACTED]>
CC: Craig Sweeney <[REDACTED]>, Stuart Cunliffe
<[REDACTED]>, Steve Whalley
<[REDACTED]>, Olly Padbury
<[REDACTED]>
Subject: RE: Coriolis Energy wind farm at Y Bryn
Date: Tue, 17 Aug 2021 09:12:33 +0000

Hi Malcolm,

As you've already mentioned, this proposal is somewhat different to the ones we have dealt with in Scotland as these turbines are in close proximity to significant cultural lighting. Cultural lighting can present difficulties for crews operating on NVG as the light can cause blooming and individual lights can be 'lost' in the noise. This means crews might elect to work off NVG when operating in or near built up areas. With this in mind, this development will probably benefit from both IR and visible lighting. I'm agreement that the northern cluster will require all turbines to be lit but perimeter lighting on the southern one would be sufficient.

As always, any lighting would have to ensure that the perimeter of the development is clearly de-lineated and any turbines that protrude significantly above the rest would have to be lit. Furthermore, it is vitally important that the development is clearly marked on aviation charts and listed in appropriate databases.

As you have said, it's probably worth having a chat before moving forward with recommendations.

Olly, Steve,

Are there any HLSs you use in the vicinity of this development?

Regards,

John

Captain John Sheldon
Deputy Chief Pilot
UK Search and Rescue - Inverness

[REDACTED]
Tel + [REDACTED]
Mob [REDACTED]

Bristow Helicopters Limited
Inverness Airport
Dalcross
IV2 7JB

-----Original Message-----
From: Malcolm Spaven <[REDACTED]>
Sent: 12 August 2021 14:07
To: John Sheldon <[REDACTED]>
Cc: Craig Sweeney <[REDACTED]>; Stuart Cunliffe <[REDACTED]>;
Steve Whalley <[REDACTED]>; Olly Padbury <[REDACTED]>
Subject: Re: Coriolis Energy wind farm at Y Bryn

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi John

file:///C:/Users/44771/AppData/Local/Temp/eud2F.htm

17/09/2021

Thanks for your email. Good to hear you're the single point of contact for Bristow SAR - you must have drawn the short straw! 😊

The Y Bryn proposal consists of 21 turbines in two blocks - six turbines to the north of the B4282 road, and 15 turbines on the main site between Maesteg and Margam - see attached. NB the turbine numbering is not continuous - there is no Turbine 1, 2, 9, 22 or 23.

We haven't developed a lighting scheme yet because the current proposed layout doesn't easily lend itself to lighting corner turbines as we've done with previous wind farms you've dealt with. I think it may be difficult to avoid lighting all six northern turbines. The southern block has more possibilities. However I'd welcome your views on what would be appropriate from your operational point of view, given how your St Athan crews typically operate at night in that area - including whether there might be possibilities for agreeing IR lighting only.

Happy to have a chat with the layout in front of us if that's easier.

Let me know what you think.

Thanks and best regards

Malcolm

At 18:48 11/08/2021, John Sheldon wrote:

>Hi Malcolm,
>
>
>
>I hope all is well with you?
>
>
>
>I understand you've made contact with the UK SAR Base at St Athan
>regarding the proposed wind farm at Y Bryn. If you please forward the
>details of the proposal to me and I will respond on behalf of the
>Bristow UK SAR operation.
>
>
>
>Kind Regards,
>
>
>
>John
>
>
>
>
>Captain John Sheldon
>
>Deputy Chief Pilot
>
>UK Search and Rescue - Inverness
>
>
>
><mailto:John.sheldon@bristowgroup.com>John.sheldon@bristowgroup.com
>
>Tel + [REDACTED]

file:///C:/Users/44771/AppData/Local/Temp/eud2F.htm

17/09/2021

>
>Mob + [REDACTED]
>
>
>
>Bristow Helicopters Limited
>
>Inverness Airport
>
>Dalcross
>
>IV2 7JB
>
>
>
>
>
>Disclaimer
>
>The information contained in this communication from the sender is
>confidential. It is intended solely for use by the recipient and others
>authorized to receive it. If you are not the recipient, you are hereby
>notified that any disclosure, copying, distribution or taking action in
>relation of the contents of this information is strictly prohibited and
>may be unlawful.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

file:///C:/Users/44771/AppData/Local/Temp/eud2F.htm

17/09/2021

A3.3.11 NP / UK SEARCH AND RESCUE(SAR) DISCUSSIONS REGARDING REDUCED LIGHTING SCHEME – NOVEMBER 2021

Page 2 of 2

Page 1 of 2

From: John Sheldon [REDACTED]
To: Malcolm Spaven [REDACTED]
CC: Olly Padbury [REDACTED], Craig Sweeney [REDACTED], Stuart Cunliffe [REDACTED]
Subject: RE: FW: Coriolis Energy wind farm at Y Bryn
Date: Thu, 25 Nov 2021 12:44:28 +0000

Hi Malcolm,

In response to your questions:

1. I'm content for the 2 turbines in question in the Northern block to have IR lights only.
2. I'm happy with the arrangement of IR versus visible lights across both blocks apart from the one you've queried in question 3.
3. Given, this is the highest turbine by over 100ft, I would recommend IR lighting as a minimum on that turbine. The reason I mention this is we have procedures in UK SAR when flying with NVG to climb to clear a marked obstruction by a minimum of 100ft, rounded up to the nearest 50ft, if not visual by 0.5 nm. We call this Minimum Safe Height (MSH) which is an NVG thing, not to be confused with Safety Altitude. So, if a crew elected to fly over they might only clear it by 100ft. However, the reality is that they will not go near this development at low-level but I feel it is better to be safe than sorry!

I hope this answers your questions.

Thanks,

John

Captain John Sheldon
AW189 Type Rating Instructor
UK Search and Rescue - Inverness

Tel + [REDACTED]
Mob [REDACTED]

Bristow Helicopters Limited
[REDACTED]

-----Original Message-----

From: Malcolm Spaven [REDACTED]
Sent: 04 November 2021 10:55
To: John Sheldon [REDACTED]
Cc: Olly Padbury [REDACTED], Craig Sweeney [REDACTED], Stuart Cunliffe [REDACTED]
Subject: Re: FW: Coriolis Energy wind farm at Y Bryn

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi John

Apologies once again for the delay in progressing this with you. It's a busy time for wind farms!

I understand you're back in on Monday afternoon so I hope to speak to you then. In the meantime please find attached a suggested lighting layout for the proposed Y Bryn wind farm based on suggestions from your counterparts at Wales Air Ambulance.

I think their suggestions are largely in line with yours in your email of 17th August. However there are three particular questions which I'd like to explore with you:

1. Are you happy with the two unlit turbines in the Northern Block?
2. Are you happy with which turbines have IR lighting only?
3. The highest turbine is shown. Its blade tips will be approximately 100ft higher than those of the highest lit turbine in the Southern Block. At present we are not proposing to put a light on it but if you require it to be lit would you be content with just an IR light?

I look forward to speaking to you next week.

Regards

Malcolm

file:///C:/Users/44771/AppData/Local/Temp/eud11.htm

23/05/2022

file:///C:/Users/44771/AppData/Local/Temp/eud11.htm

23/05/2022

A3.3.12 NATIONAL AIR TRAFFIC SERVICE (NATS) OBJECTION TO Y BRYN – OCTOBER 2021

Rafe Osborne

To: Trevor Hunter
Subject: RE: SG32198 Y Bryn Wind Farm

From: NATS Safeguarding <>
Sent: 12 October 2021 13:25
To: Trevor Hunter <>
Cc: NATS Safeguarding <>
Subject: SG32198 Y Bryn Wind Farm

Dear Trevor

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report SG32198 TOPA Issue 1.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries please contact us using the details below.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

A3.3.13 NATS REISSUED TECHNICAL AND OPERATIONAL ASSESSMENT (TOPA)– NOVEMBER 2021

>From: "ENRIGHT, Emily S" <>
>To: Malcolm Spaven <>
>CC: NATS Safeguarding <>, Ffion Edwards
> <>, Lucy Freeman <>
>Subject: RE: FW: SG32198 Y Bryn Wind Farm
>Date: Wed, 10 Nov 2021 12:19:21 +0000
>
>Dear Malcolm
>
>
>
>Thanks for letting us know and apologies for the error. Please find
>attached revised TOPA Issue 2 with updated wording.
>
>
>
>Best wishes
>
>Emily
>
>
>
>[]
>
>
>
>
>NATS Safeguarding
>
>E: <<mailto:>>
>
>
>
>4000 Parkway, Whiteley,
>Fareham, Hants PO15 7FL
><<http://www.nats.co.uk>>www.nats.co.uk
>
>
>
>
>

>
>
>From: Malcolm Spaven <<mailto: [REDACTED]>>
>Sent: 05 November 2021 15:20
>To: NATS Safeguarding
><<mailto: [REDACTED]>>
>Cc: Ffion Edwards
><<mailto: [REDACTED]>> f [REDACTED]; lucy
>Freeman <<mailto: [REDACTED]>>
>Subject: Re: FW: SG32198 Y Bryn Wind Farm
>
>
>
>Dear NATS
>
>I am acting for Coriolis Energy on their Y Bryn wind farm project in
>South Wales.
>
>Your TOPA, delivered on 12th October, concludes in paragraph 4.4.2 that
>"The planned development site is inside controlled airspace, in an
>area frequently used by commercial flights operating in and out of
>Cardiff Airport, as such the anticipated impact has been assessed as
>being unacceptable."
>
>Figure 1 of the TOPA does not show the boundaries of controlled
>airspace. However it does clearly show that the proposed development
>is well clear of all SIDs and STARs from/to Cardiff. The attached
>graphic - an annotated excerpt from AIP ENR 6.7 - shows that the Y
>Bryn site is well clear of all controlled airspace.
>
>With that background I would be grateful if you could take another
>look at the potential impact of this wind farm proposal and, if
>necessary, re-issue the TOPA taking that information into account.
>
>With thanks and regards
>
>Malcolm Spaven
>
>
>At 12:34 12/10/2021, you wrote:
>
>>From: NATS Safeguarding
>><<mailto: [REDACTED]>> N [REDACTED]
>>Sent: 12 October 2021 13:25
>>To: Trevor Hunter
>><<mailto: [REDACTED]>> T [REDACTED]
>>Cc: NATS Safeguarding
>><<mailto: [REDACTED]>>
>>Subject: SG32198 Y Bryn Wind Farm
>>
>>
>>
>>Dear Trevor
>>
>>We refer to the application above. The proposed development has been
>>examined by our technical safeguarding teams and conflicts with our

2

>>safeguarding criteria.
>>
>>Accordingly, NATS (En Route) plc objects to the proposal. The
>>reasons for NATS's objection are outlined in the attached report
>>SG32198 TOPA Issue 1.
>>
>>We would like to take this opportunity to draw your attention to the
>>legal obligation of local authorities to consult NATS before
>>granting planning permission for a wind farm. The obligation to
>>consult arises in respect of certain applications that would affect
>>a technical site operated by or on behalf of NATS (such sites being
>>identified by safeguarding plans that are issued to local planning
>>authorities).
>>
>>In the event that any recommendations made by NATS are not accepted,
>>local authorities are obliged to follow the relevant directions
>>within Planning Circular 2 2003 - Scottish Planning Series: Town and
>>Country Planning (Safeguarded Aerodromes, Technical Sites and
>>Military Explosives Storage Areas) (Scotland) Direction 2003 or
>>Annex 1 - The Town And Country Planning (Safeguarded Aerodromes,
>>Technical Sites And Military Explosives Storage Areas) Direction 2002.
>>
>>These directions require that the planning authority notify both
>>NATS and the Civil Aviation Authority ("CAA") of their intention. As
>>this further notification is intended to allow the CAA to consider
>>whether further scrutiny is required, the notification should be
>>provided prior to any granting of permission.
>>
>>It should also be noted that the failure to consult NATS, or to take
>>into account NATS's comments when determining a planning
>>application, could cause serious safety risks for air traffic.
>>
>>Should you have any queries please contact us using the details below.
>>
>>Yours faithfully
>>
>>
>>
>>
>>NATS Safeguarding
>>
>>E:
>>
>><<mailto: [REDACTED]>>
>>
>>
>>
>>4000 Parkway, Whiteley,
>>Fareham, Hants PO15 7FL
>><<<http://www.nats.co.uk>>><http://www.nats.co.uk>>>www.nats.co.uk
>>
>>
>>
>>

3

Prepared by:
NATS Safeguarding Office



Technical and Operational Assessment
(TOPA)

For Y Bryn
Wind Farm Development

NATS ref: SG32198

Issue 2

Contents

1.	Background	4
1.1.	En-route Consultation	4
1.2.	Airport Consultation	4
2.	Scope	5
3.	Application Details	6
4.	Assessments Required	7
4.1.	En-route RADAR Technical Assessment	7
4.1.1.	Predicted Impact on Bristol RADAR	7
4.2.	En-route Navigational Aid Assessment	7
4.2.1.	Predicted Impact on Navigation Aids	7
4.3.	En-route Radio Communication Assessment	7
4.3.1.	Predicted Impact on the Radio Communications Infrastructure	7
4.4.	Airport Assessment	8
4.4.1.	Predicted Impact on Cardiff RADAR	8
4.4.2.	Cardiff Operational Assessment	8
4.4.3.	Predicted Impact on Bristol RADAR	8
4.4.4.	Bristol Operational Assessment	8
5.	Conclusions	8
5.1.	En-route/Airport Consultation	8

Notice

The circulation of NATS Protectively Marked information outside NATS is restricted. Please do not redistribute this information without first obtaining NATS' permission. Every effort should be made to prevent any unauthorised access to this information and to dispose of it securely when no longer required.

NATS is not a public body and therefore has no duty under FOIA and EIR to release information. NATS does however appreciate that other organisations that receive NATS information could be subject to FOIA and EIR. With this in mind please do not release any NATS protectively marked information without prior consent from the author of the information and exemptions could apply.

Publication History

Issue	Month/Year	Change Requests and summary
1	October 2021	Pre-planning application
2	November	Amendment to 4.4.2. Cardiff Operational Assessment

Document Use

External use: Yes

Referenced Documents

NATS Public

1. Background

1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

1.2. Airport Consultation

NATS provides air traffic services at most of the UK's major airports. Included in the service that NATS provides to these airports is technical and operational safeguarding.

Whilst the airport owner or operator remains the statutory planning consultee, NATS carries out the assessment and provides technical advice to the airport. This includes making a recommendation on whether to object or not to a planned development.

The Airport Assessment section of this document details any advice NATS would provide to relevant airports.

Please note that where airport consultation is undertaken, any assessment and any statements made refer exclusively to the impact of wind turbines upon the Air Traffic Control infrastructure and only to airports where NATS provides safeguarding services namely Aberdeen, Cardiff, Glasgow, Heathrow, Stansted, Manchester and Southampton.

An airport operator may object on other aviation grounds such as obstacle clearance despite no impact being anticipated on its ATC infrastructure. If in doubt, the airport operator should be consulted for advice.

NATS Public

2. Scope

This report provides NATS En-Route plc’s view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS’ statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3. Application Details

Coriolis Energy submitted a request for a NATS technical and operational assessment (TOPA) for the development at Y Bryn Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Hub (m)	Tip (m)
3	51.6277	-3.7001	282422	193467	121	206
4	51.6272	-3.6920	282978	193397	121	206
5	51.6291	-3.6838	283552	193600	121	206
6	51.6235	-3.6927	282921	192990	121	206
7	51.6266	-3.6803	283783	193309	121	206
8	51.6221	-3.6829	283594	192814	121	206
10	51.6046	-3.7033	282136	190907	145	230
11	51.6030	-3.6976	282528	190718	145	230
12	51.6007	-3.7057	281963	190469	165	250
13	51.5963	-3.7011	282268	189977	165	250
14	51.5934	-3.6978	282490	189646	165	250
15	51.5907	-3.6935	282783	189343	165	250
16	51.5877	-3.6887	283107	188997	121	206
17	51.5951	-3.7202	280945	189877	121	206
18	51.5922	-3.7149	281299	189545	165	250
19	51.5908	-3.7081	281770	189376	165	250
20	51.5890	-3.7023	282166	189165	165	250
21	51.5862	-3.6980	282459	188852	121	206
24	51.5883	-3.7207	280888	189123	121	206
25	51.5870	-3.7158	281227	188966	121	206
26	51.5847	-3.7091	281683	188698	121	206

Table 1 – Turbine Details