

Appendix 2C

Pre-Application Consultation Responses

consultation@ftgrid.co.uk

Ein cyf/Our ref: CAS-276925-W4W8
Eich cyf/Your ref:

Dyddiad/Date: 07 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION – THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

PROPOSAL: 66 KV ELECTRICITY NETWORK INFRASTRUCTURE COMPRISING OVERHEAD LINES AND UNDERGROUND CABLES WHICH WILL START AT FOEL TRAWSNANT WIND FARM (GRID REF: 283941, 194161) IN THE NORTH, HEADING SOUTH THROUGH THE WESTERN EDGE OF MAESTEG (GRID REF: 284482, 191458) TO A CONNECTION POINT WITH THE EXISTING OVERHEAD LINE APPROXIMATELY 2 KM SOUTH WEST OF THE SETTLEMENT OF LLANGYNWYD (GRID REF: 284175, 187428)

LLEOLIAD/LOCATION: FROM FOEL TRAWSNANT WIND FARM NORTH OF MAESTEG TO SOUTH OF MAESTEG, NR. LLANGYNWYD PROPOSED DEVELOPMENT

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected species, ornithology, protected sites, land contamination and flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.

1.0 Protected Species

We have reviewed the following documents in relation to protected species:

- EIA Report – Volume 1: Main Report, Foel Trawsnant Grid Connection, Pennant Walters, March 2025, by WSP
- Appendix 4A, Outline Construction Environment Management Plan, dated March 2025, by WSP

- Appendix 8A WSP (2025) Foel Trawsnant Grid Connection. Preliminary Ecological Appraisal, dated March 2025
- Appendix 8B, CSA Environmental (2024a). Preliminary Ecological Appraisal - Foel Trawsnant Wind Farm, dated March 2025 by WSP
- Appendix 8C CSA Environmental (2024b). Dormouse Survey Report - Foel Trawsnant Wind Farm, Maesteg, dated March 2005 by WSP
- Appendix 8D CSA Environmental (2024c). Water Vole Survey Report - Foel Trawsnant Wind Farm, dated March 2025 by WSP

Drawings and Plans

- Figure 8.1, Survey Area, Pennant Walters Foel Trawsnant Grid Connection Environmental Statement Chapter 8 - Ecology , dated March 2025 by WSP
- Figure 8.4, Phase 1 Habitat Results, dated March 2025 by WSP
- CSA Environmental (2024d). Great Crested Newt Report - Foel Trawsnant Wind Farm, Maesteg. November 2024.

The application is for the construction of 4.4km of overhead line and 5.1km of underground cable including associated infrastructure to connect Foel Trawsnant Wind Farm to the national grid. We welcome that the development has been designed to run underground cable beneath the existing highway network for almost all of its length, and overhead lines have been designed as far as possible to avoid hedgerows, woodland, trees and water courses.

We note that Phase 1 habitat survey has been undertaken of the survey area, as well as more detailed survey for water vole, dormice and great crested newts (GCN). We note and welcome that additional survey for bats and otter is being undertaken and the associated reports will be submitted with the formal application.

Legislation and policy

Bats, otter, dormice and great crested newt are European Protected Species, legally protected under The Conservation of Habitats and Species Regulations 2017 (as amended). Legal protection relates to the animals themselves and the places they use to rest and breed.

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

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

These requirements are translated into planning policy through Planning Policy Wales (PPW) Edition 12, February 2024, section 6.435 and 6.4.36 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority should take them into account when considering development proposals where a European Protected Species is present.

Nationally fully protected species

Water voles are fully protected under the Wildlife and Countryside Act 1981 (as amended) and are a species of conservation concerns in Wales through their inclusion on lists published by the Welsh Government under section 7 of the Environment (Wales) Act 2016. There is no licensing provision of the intentional destruction of water vole habitat. A licence may only be issued for conservation purposes, and will be required if water voles or their habitat are likely to be affected. Where this applies the licence application will need to demonstrate a conservation benefit to water voles.

1.1 Bats

The submitted Preliminary Ecological Appraisal report (PEA) confirms that the survey area provides suitable habitat for foraging and commuting bats in the form of dense scrub, woodland, and linear habitats such as running water, tree lines and hedgerows.

The Environmental Statement (ES), Chapter 8, Sections 8.8.27 / 8.8.28, confirms that following a daytime bat walkover of the site, three trees were identified as having bat roosting potential, located in the southern section of the site. Whilst we welcome that these trees are not being removed, we note they may require manipulation should they lie within 4m of a pole, in order to facilitate the development (ES, Chapter 8, Section 8.8.29).

We welcome that further close inspection surveys of trees within the development boundary, and automated monitoring surveys are being undertaken (ES, Chapter 8, Section 8.8.32).

As per our scoping advice we advise that ground level assessments detailing bat roosting potential are undertaken of those trees to be felled or pruned to accommodate the development. Where trees are identified to be of moderate or high potential for bats, we advise that the ground level assessments are supplemented by more detailed survey in the form of climbed endoscope and / emergence survey in accordance with published best practice survey guidelines. Should bat roosts be confirmed, we advise that an assessment of the impacts of the scheme on these roost sites is undertaken and proposals included to mitigate or compensate for them.

We welcome the intention for survey results to be used to determine minimum stand-off buffers from sensitive habitats to bats. We advise that where possible all features with suitability for bats are retained and poles are micro sited away from features and areas of sensitivity.

Table 8-11, Chapter 8, in the ES, confirms that around 1.68ha of woodland (wet woodland, lowland mixed deciduous woodland, upland oakwoods, and ancient woodland) may need to be temporarily removed as part of the development, as well as tree removal at one location. We advise that all areas of habitat removal are clearly marked on a submitted plan, detailing the habitat to be removed alongside the proposed quantity to be removed. We reserve further comment until the additional survey has been completed and the associated report submitted with the formal application.

1.2 Watervole

The submitted PEA confirms that survey for water vole was undertaken by CSA Environmental in 2024 and found evidence of the species in the northern-most section of

the application site, along watercourses A.1 and A, as identified within the submitted water vole survey report (referenced above).

The report identifies that as well as using the aforementioned watercourses, adjacent terrestrial habitat areas (specifically two fields supporting purple moor-grass, rush pasture and upland acid grassland habitats) are likely to be used by water vole due to the suitability of the habitat.

We welcome that the cable route has been designed to avoid impacts to water vole as far as possible by running the route north of the watercourse, and along an existing hardstanding track at the eastern edge of a field, running parallel to watercourse A.2 (where no water vole signs were identified). We welcome that poles will be located away from the watercourse in order to avoid habitats used by water vole.

We advise that a minimum buffer from any construction activities, of 5m from top of bank is implemented to protect the identified watercourses and associated habitat. We advise that this is clearly demarked on a submitted drawing or plan and submitted with the formal application.

We welcome that a Conservation Plan will be produced to incorporate long term management and monitoring of the habitats on site suitable for water vole. We advise that the principles of this plan are submitted within the formal application for review.

1.3 Otter

The submitted PEA confirms that a walk over of the watercourses throughout the survey area identified that they are suitable to support resting otter, with the southern section as likely suitable for foraging. We welcome that further survey of the watercourses for otter is being undertaken within the survey area (Section 8.8.43, Chapter 8, ES).

We advise that survey for otter is designed to identify potential breeding and resting places along watercourses and within riparian habitats, and that survey results are used to inform appropriate mitigation (this may include but not be limited to appropriate buffers to the working corridor). We advise that where possible the working corridor and poles are sited away from areas of sensitivity to otter.

We reserve further comment until the additional survey has been completed and the associated report submitted with the formal application.

1.4 Dormice

We note that nest tube and nest box survey for dormice was undertaken in 2024, within the parcel of broadleaved woodland on site. We note that no evidence of dormouse was confirmed and have no further comment with respect to this species.

1.5 GCN

Within our scoping response to the development we advised that all waterbodies within 250m of the application boundary were clearly identified and eDNA survey of all appropriate waterbodies undertaken.

We note that eDNA survey of four appropriate waterbodies within 500m of the site boundary have been undertaken and produced negative results. We note that no evidence of GCN was confirmed and have no further comment with respect to this species.

1.6 Lighting

Due to the ongoing species (bat and otter) survey being undertaken it would be prudent to provide advice in regards to lighting. However, we note from the submitted Outline Construction Environmental Management Plan that lighting requirements are limited to site and task lighting, and will be utilised only during the construction phase. We welcome that lighting will be positioned to specifically avoid riparian, woodland or other sensitive habitats (Sections 5.7.2, 5.1.27). We therefore anticipate that the risks of potential impacts to nocturnal protected species can be managed through a condition securing lighting design as part of a Construction Environmental Management Plan for the site.

1.7 Summary

We advise that the additional information set out in the above points and summarised below is included in the formal submission.

- 1.) additional bat survey (comprising additional survey for trees to be impacted by the development), the associated reports to be submitted, and results utilised to inform mitigation proposals as appropriate.
- 2.) relevant drawings and plans to show:
 - a. the location and size of buffers / stand offs to sensitive habitat features for bats, wolverine and including otter as required.
 - b. all areas of habitat removal, identifying the location, extent and nature of the habitat to be removed
- 3.) principles of a conservation plan for water vole.

1.8 Planning Conditions

In addition to the above, we are likely to advise the determining body that conditions for the following are required:

- Implementation of the Environmental Statement
- A CEMP including details of lighting during construction
- A Conservation Plan for water vole

Please note that we may advise further on planning conditions pending the detail included in the submitted formal application.

2.0 Terrestrial Ornithology

We note from the Draft Environment Statement that surveys to determine impact on ornithology are required and are due to be undertaken. These will be included within a final ES. We are therefore unable to provide comment on ornithology.

We therefore reserve further comment until the additional survey has been completed and the associated report submitted with the formal application.

3.0 Protected Sites

We note that there are no protected sites likely to be directly impacted by these proposals. We therefore have no further comments to make at this time.

We would advise the determining body that a Construction Environment Management Plan (CEMP) condition be attached to any permission granted. We can advise further details of this pending the additional information requested above for Protected Species.

4.0 Land Contamination

We note that the proposal intends for the buried cabling to be left in perpetuity in the ground.

We advise the provision of a Cable Buried Risk Assessment (CBRA) as an EIA deliverable if cabling will remain in the ground in perpetuity following decommissioning. This aligns with the Well-being of Future Generations Act (Wales) which mandates sustainable decision-making. The presence of persistent chemicals in buried cabling could:

- Contradict the Act's environmental sustainability goals if future generations are left with contamination risks.
- Require a more circular economy approach, ensuring renewable projects do not leave hazardous legacy materials.
- Justify stricter environmental standards for cable selection in planning approvals, promoting biodegradable or fully recyclable cabling.

The assessment should consider the potential release of chemicals, including from non-fluid filled cables that comprise the total length of cabling remaining in the ground over the timeframe of 'Perpetuity'. The assessment may include the following but is not meant to be a definitive statement or scope but rather as an illustration as to what could be considered:

- Define the Scope of the Assessment
 - Specify the type and quantity of cabling (e.g., voltage, insulation type, conductor material).
 - Assess the total length of cabling that will be left in the ground.
 - Define how a meaningful BCRA could be performed. Decide if a desk-based approach is sufficient or not.
- Data Collection & Site Characterization – reliance on desk-based information or not. Environmental conditions such as pH, climate and hydrology.
- Identify Potential Contaminants & Release Mechanisms – leaching rates.
- Contaminant Fate & Transport Modelling – the nature of the site, its environmental sensitivity, and the types of cables used are influencing factors in the type of modelling deemed reasonable.
- Risk Assessment & Exposure Pathways – consideration of the source-pathway-receptor linkage model with potential climate change influencing factors.
- Mitigation & Remediation Strategies

Examples:

- Use of Halogen-Free Cables:
 - Reduces risks from brominated flame retardants and chlorine-based compounds.
- XLPE Instead of PVC Insulation:
 - XLPE has a lower potential for releasing phthalates and chlorine compounds.
- Corrosion Protection for Metal Conductors:
 - Properly jacketed cables and controlled soil conditions (e.g., pH-neutral environment) prevent copper and aluminium leaching.
- End-of-Life Management:
 - Mandating removal or recycling of cables rather than leaving them in the ground ensures future contamination risks are minimized.

Buried electrical cabling used in wind farms, solar farms, and Battery Energy Storage System (BESS) sites typically consists of copper or aluminium conductors, insulation, and protective sheathing. The materials commonly used include:

Metals:

- Copper or Aluminium from conductors can corrode over time and leach into the surrounding environment, especially if the cable sheathing deteriorates.

- Lead may be present in older cable sheaths.

Insulation and Sheathing Materials:

- Polyvinyl Chloride (PVC): Contains plasticizers such as phthalates, which can leach out over time. Some PVC materials may also release chlorinated compounds if they degrade.
- Cross-linked Polyethylene (XLPE)
- Rubber-based insulation (EPR - Ethylene Propylene Rubber).
- PFAS

Other Potential Contaminants:

- Flame Retardants (e.g., brominated compounds, organophosphates, or antimony trioxide)
- Polycyclic Aromatic Hydrocarbons (PAHs): Found in protective coatings.
- Heavy metals: Some cable sheathing or jointing compounds may contain cadmium, zinc, or lead.

5.0 Water Resources and Flood Risk

5.1 Water Framework Directive

We note that a WFD scoping and screening assessment will be submitted. We reserve further comment until the additional survey has been completed and the associated report submitted with the formal application.

5.2 Flood Risk

We note the majority of the cable route lies outside an area at risk of flooding. We note that two sections of the route will cross areas at risk of flooding however, the impacts are expected the minimal.

A flood risk activity permit (FRAP) may be required from us, for example to construct a structure on the bank of a main river. Any works affecting an ordinary watercourse may require an Ordinary Watercourse Consent from the relevant Lead Local Flood Authority.

Other Matters

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

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

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

Yn gywir / Yours faithfully,

Lindy Marshall

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

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Pennant Walters Ltd

Dyddiad/Date: 29 April 2025

Sent by email:
consultation@ftgrid.co.uk

Dear Sir / Madam,

Foel Trawsnant Windfarm Connection

Thank you for your email of 17 March 2025 consulting us on the above pre-application for the proposed development of national significance (DNS).

Advice

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final application.

Having carefully considered the information provided; we have no objection to the proposed development. Our assessment of the pre-application is given below.

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

Assessment

Within a 3km developer ZTV:

GM058 Roman Camp
GM059 Y Bwlwarcau
GM085 Llangynwyd Castle
GM086 British Fortified Residence
GM092 Mynydd Ty Talwyn Ancient Farms
GM443 Site of Bodvoc Stone
GM552 Garth Hill Platform House
GM557 Twmpath Diwlith Round Barrow

Registered Historic Landscape:

HLW (WGI/MGI) 2 Margam Mountain



Listed Buildings

11243	Church of St Cynwyd	II*
11257	Maesteg Sports Centre, The Cornstores	II*
11331	Iron bridge over River Llynfi	II*
11352	The Old House Inn PH	II
11353	Telephone call box in front of the Old House PH	II
11356	Siloh Independent Chapel	II
11367	Tabor Eglwys Presbyteriadd Cymru	II
11373	Pentre Farmhouse, with attached farm range.	II
18493	Bethania Capel y Bedyddwyr Neillduol	II*
18494	Neuadd y Dref (Town Hall)	II
18495	Salem Welsh Baptist Chapel	II*
18496	Capel Saron	II
18498	North Company Offices	II
18499	Maesteg Council Offices, with flanking walls and piers. Church of St Michael and All Angels, Llangynwyd with Maeste	II*
18500	including enclosing graveyard wall.	II
18501	Zoar Chapel	II
18502	Church of St David, and surrounding churchyard railed wall.	II
18503	Colonel North Memorial Hall	II
18504	Post Office	II
18506	The Star Public House	II
18507	Nantyffyllon Workmen's Institute	II
20429	The Hopcyn Cross	II
20430	Two chest tombs on S side of the Church of St Cynwyd	II
20431	Group of five tombs S of the tower of the Church of St Cynwyd	II
	Group of 4 Hopkin and Jenkins tombs within iron railings on the	
20434	W side of the path to the S porch	II
	Group of nine memorials on the W side of the path to the	
20435	porch, Church of St Cynwyd	II
20436	Jenkins Monument in the churchyard, Church of St Cynwyd	II
20437	Churchyard walls around the graveyard, Church of St Cynwyd	II
87889	Catholic Church of Our Lady and St Patrick	II

This advice is given in response to a statutory pre-application consultation in regard to a 66kv line to run for around 10 kilometres, between Foel Trawsant wind farm through the western side of Maesteg and down to a connection point to the national grid, southwest of Llangynwyd. 5.1km of the line will be buried underground cable and 4.4km will be an overhead line on wooden poles.

The application will be accompanied by an environmental statement prepared by WSP. Chapter 9 of this document considers the impact of the proposed development on the Historic Environment. It has concluded that there will be no direct impact on designated historic assets and no significant impacts on their settings. We concur with this conclusion. It has also considered the likely impact on non-designated historic assets



and potential archaeological features and concluded that it is unlikely that these will be significantly affected by the proposals.

Finally, it is strongly recommended that Heneb: The Trust for Welsh Archaeology, the archaeological advisors to Bridgend County Borough Council and Neath Port Talbot County Borough Council should be consulted to confirm that they agree with this conclusion.

Yours sincerely,

Nichola Smith
Historic Environment Branch

Annex A

Our role

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

National Policy

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

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

