

Ffynnon Oer Wind Farm Life Extension
Volume 1 - Written Statement

nadara



Ffynnon Oer Wind Farm Life Extension

Section 1 - Introduction

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Glossary

Term	Definition
Applicant	Ffynnon Oer Windfarm Limited
Baseline	The existing conditions that prevail against which the effects of the wind farm life extension are assessed against.
EIA Regulations	The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended).
Environmental Impact Assessment (EIA)	EIA is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations.
ES Addendum	A supplementary document to the original ES that provides additional and updated environmental information.
Proposed Life Extension	The proposed life extension for Ffynnon Oer Wind Farm to continue operating for an additional 10 years.
Section 73	Section 73 of the Town and Country Planning Act 1990 (as amended). An application under section 73 is an application to remove or vary planning conditions attached to a previous planning permission.
Site boundary	The land occupied by Ffynnon Oer Wind Farm.

Abbreviations

Abbreviation	Definition
CCC	Climate Change Committee
CIC	Community Interest Company
ES	Environmental Statement
EIA	Environmental Impact Assessment

ESAS	European Seabirds at Sea
GHG	Greenhouse Gas
GWh	Gigawatt hours
IEMA	Institute of Environmental Management
ESAS	European Seabirds at Sea
ISEP	Institute of Sustainability and Environmental Professionals
km	Kilometre
LCA	Life Cycle Analysis
LDP	Local Development Plan
LVIA	Landscape and Visual Impact Assessment
m	metre
MW	Megawatt
MWh	Megawatt hour
NPTCBC	Neath Port Talbot County Borough Council
NRW	Natural Resources Wales
PAA	Pre-Assessed Area
PPW	Planning Policy Wales
PRoW	Public Right of Way
RLDP	Replacement Local Development Plan
SIP	Single Integrated Plan
TAN	Technical Advisory Note
TCPA	Town and Country Planning Act
WG	Welsh Government

1.5 Introduction

- 1.5.1 Ffynnon Oer Wind Farm is an operational wind farm, comprising 16, two Megawatt (MW) turbines, with a total installed capacity of 32 MW, located between the Afan and Neath valleys in South Wales. Ffynnon Oer Wind Farm generates approximately 87.7 gigawatt hours (GWh) of electricity per annum, based on RenewableUK's methodology, enough to power the average annual consumption of around 26,404 homes¹.
- 1.5.2 The wind farm is located approximately 2 km west of Glyncorrwg, fully within the Neath Port Talbot County Borough Council (NPTCBC) jurisdiction. The location of Ffynnon Oer Wind Farm is shown in Figure 1.1: Site Location found at the end of this Environmental Statement (ES) Addendum. Figure 1.2: Site Layout shows the site boundary and infrastructure layout of Ffynnon Oer Wind Farm.
- 1.5.3 The site is owned and managed by Ffynnon Oer Windfarm Limited (hereafter referred to as 'the Applicant') and is a wholly owned subsidiary of Nadara Limited (Nadara). Nadara was formed in January 2024 through the coming together of Ventient Energy and Renantis. Nadara designs, builds and manages power plants from renewable energy sources with an installed capacity of more than 4.2 gigawatts (GW) across 200 plants globally. Nadara companies have been operating in the UK since 2002 with offices in Inverness, Edinburgh and London, and currently operate 45 onshore wind farms in the UK.
- 1.5.4 In 2002, Entec completed an Environmental Impact Assessment (EIA) for Ffynnon Oer Wind Farm as part of an application for planning permission to NPTCBC (planning application reference P2002/1322). The original ES submitted for the application was included in Volume 2: Appendix A2 of the Scoping Report for this life extension application (and can also be found in

¹ Calculated from average domestic household consumption figures provided on the RenewableUK website: <https://www.renewableuk.com/energypulse/ukwed/> [Accessed 25 February 2026].

The calculations are as follows:

Total energy produced = 32 MW (installed capacity) x 0.313 ("all wind" load factor) x 8,760 (hours per year) = 87.7 GWh.

Homes powered = 87.7 GWh total energy output / 3.323 MWh (average Great Britain (GB) domestic annual consumption) = 26,404 homes. Note that the figure for average GB domestic annual consumption is based on the most up to date figures (December 2025).

A1.2: Scoping Report, Scoping Opinion and Pre-Application Consultation, of this ES Addendum).

- 1.5.5 NPTCBC granted planning permission for Ffynnon Oer Wind Farm on 27th May 2003, subject to a number of conditions, including Condition 6 which restricts the operational life of the wind farm to 20 years after the date of commencement of electricity generation (see copy of decision notice in Appendix A1.1: Planning permission approval with consented planning conditions).
- 1.5.6 Ffynnon Oer Wind Farm commenced generation of electricity on 31st July 2006 and has continued operation since this date. The existing consent is due to expire on the 31st July 2026 (as per Condition 6 of the current planning permission). The Applicant is seeking to amend Condition 6 to extend the operational life of Ffynnon Oer Wind Farm by an additional 10 years, to enable operations to continue until 31st July 2036 (referred to as the Proposed Life Extension).
- 1.5.7 This ES Addendum has been produced by Natural Power Consultants Ltd (Natural Power), on behalf of the Applicant, in support of an application being made via Section 73 of the Town and Country Planning Act 1990 (hereafter Section 73 application) to amend the existing permission in order to extend the life of Ffynnon Oer Wind Farm, and to maximise the wind farm's generating potential.

1.6 Legislative Requirements

- 1.6.1 Table 1.1 below lists all the relevant requirements within Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 along with a reference to the locations within the ES Addendum where they can be found.

Table 1.1: Document Structure

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Requirement	Location in the ES Addendum
<i>Description of the development, including in particular:</i> a) <i>a description of the location of the development.</i>	a) Section 1: Introduction, sub-sections 1.5: Introduction & 1.8:

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Requirement	Location in the ES Addendum
	Physical Characteristics of the Operational Wind Farm.
b) <i>a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works and the land-use requirements during the construction and operational phases.</i>	b) Section 1: Introduction, sub-sections 1.5 & 1.8.
c) <i>a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used.</i>	c) Not relevant: The wind farm is already operational and no changes are proposed to its operation other than extension of life. Therefore, there are no characteristics of the operational phase of the Proposed Life Extension which require description.
d) <i>an estimate, by type and quantity, of expected residues and emissions (such as water, air, oil and subsoil pollution, noise, vibration, light, heat, radiation) and quantities and types of waste produced during the construction and operational phases.</i>	d) Not relevant: The wind farm is already operational and no changes are proposed to its operation other than extension of life.
A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the applicant or appellant which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Section 1, sub-section 1.15 (under Reasonable Alternatives heading).
A description of the relevant aspects of the current state of the environment (baseline scenario) and	Sub-section 15.15 (Paragraph 15.15.20) discusses the

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Requirement	Location in the ES Addendum
<i>an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</i>	predicted future baseline in the absence of the Proposed Life Extension. See also Section 15, sub-section 15.16: Baseline; and sub-section 15.18: Survey Results (with Technical Appendix A15.2).
<i>A description of the factors specified in regulation 4 likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.</i>	All matters included in Schedule 4 have been addressed in the Scoping Report and either subsequently scoped out of the EIA or covered in Section 15; Section 15.19 addresses the predicted environmental effects of the Proposed Life Extension in relation to ecology and ornithology.
<i>A description of the likely significant effects of the development on the environment resulting from, inter alia—</i>	
a) <i>the construction and existence of the development, including, where relevant, demolition works.</i>	a) Not relevant: The wind farm is already operational and no changes are proposed.
b) <i>the use of natural resources in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources.</i>	b) Not relevant: The wind farm is already operational and no changes are proposed.
c) <i>the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances and the disposal and recovery of waste.</i>	c) Not relevant: The wind farm is already operational and no changes are proposed;

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Requirement	Location in the ES Addendum
d) <i>the risks to human health, cultural heritage or the environment (for example due to accidents or disasters).</i>	d) Sub-section 1.15 (under Population and Human Health heading); and sub-section 15.19 address the risks to human health and the environment by the Proposed Life Extension.
e) <i>the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.</i>	e) Sub-section 1.15 (under Cumulative Effects heading); and sub-section 15.22: Cumulative Effects address the cumulative effects of the Proposed Life Extension with other existing and/or approved projects.
f) <i>the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.</i>	f) The impact of the Proposed Life Extension is addressed in sub-section 1.7: Justification. The vulnerability of the Proposed Life Extension to climate change is addressed in sub-section 1.15 (under Climate Change heading).
g) <i>the technologies and the substances used.</i>	g) Not relevant: The wind farm is already operational and no changes are proposed, therefore no technologies or substances will be used.
<i>The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at European Union or Member State level which are relevant to the project, including in</i>	<i>Sub-section 15.19 addresses the predicted environmental effects of the Proposed Life Extension in relation to ecology and ornithology. Other topics were scoped out of the EIA.</i>

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017: Requirement	Location in the ES Addendum
<i>particular those established under Council Directive 92/43/EEC(1) and Directive 2009/147/EC(2).</i>	
<i>A description of the forecasting methods or evidence used to identify and assess the effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.</i>	Paragraphs 15.17.33 to 15.17.42 assess the limiting factors to the survey methodologies.
<i>A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.</i>	Sub-sections 15.19, 15.20 and Appendix 15.1 provide details of mitigation and enhancement.
<i>A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.</i>	Not relevant: The wind farm is already operational and no changes are proposed.
<i>A non-technical summary of the information provided under paragraphs 1 to 8.</i>	Standalone Non-Technical Summary (bilingual) presented.
<i>A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.</i>	A comprehensive set of references is provided in sections 1 and 15 (see footnotes).

1.7 Justification

- 1.7.1 Ffynnon Oer Wind Farm produces an estimated 87,740 Megawatt hour (MWh) of electricity each year¹ equating to an estimated reduction in CO₂ emissions of 39,308 tonnes per year² (or 393,076 tonnes over the proposed ten year extension period³).
- 1.7.2 By following already established working practices, the wind farm would be able to successfully continue operation over the proposed further 10 year extended period.
- 1.7.3 There is increasing recognition, including by the UK Committee on Climate Change (CCC), that onshore wind is currently one of the cheapest forms of electricity generation in the UK⁴.
- 1.7.4 As a low carbon development that has helped to reduce the carbon footprint of the area, the Proposed Life Extension would complement a number of NPTCBC energy related strategies and plans, such as NPTCBC's Energy Strategy (2008 - 2026) within the Local Development Plan; NPTCBC's Decarbonisation and Renewable Energy Strategy (2020) and its Local Area Energy Plan (2024); and would contribute to Welsh and UK carbon reduction targets.
- 1.7.5 Within its portfolio, Nadara has a number of wind farms that are significantly older than Ffynnon Oer Wind Farm. Nadara has developed considerable in-house engineering capability to allow wind farms to safely operate for longer and are currently operating wind farms that have been operating for more than 25 years. Over the last few years, Nadara has conducted Engineering Life Extension analysis on a number of wind farms, which provides information on the needs of each individual wind farm but also gives assurance that other wind farms in the portfolio can operate beyond the term of their original planning consent.

² Following the Renewables UK carbon dioxide reduction calculation methodology. Available at: <https://www.renewableuk.com/energypulse/ukwed/> [Accessed 25 February 2026]

³ Assuming no changes to input data

⁴ *Delivering a reliable decarbonised power system*, Climate Change Committee, March 2023. Available at: <https://www.theccc.org.uk/wp-content/uploads/2023/03/Delivering-a-reliable-decarbonised-power-system.pdf> [Accessed 25 February 2026]

- 1.7.6 Although not a material planning consideration, the community benefit fund would continue and increase throughout the proposed extended period of operation. Therefore, by extending the operational life of the wind farm, there would be an increased continued local economic contribution for an additional 10 years (discussed further in sub-section 1.10).
- 1.7.7 No new infrastructure would be required for the wind farm life extension, therefore there would be no additional impacts from this proposal over and above those which already exist with the existing operational wind farm. Ffynnon Oer Wind Farm continues to make good use of existing infrastructure and has operated over the last 19 years in line with its current consent. It remains aligned with relevant local and national policy, especially the enhanced support for meeting national climate change and renewable energy targets.

1.8 Physical Characteristics of the Operational Wind Farm

- 1.8.1 The wind farm consists of 16 operational turbines, each turbine being a Repower MM70 2 MW turbine, with a tip height of 93 m, and a hub height of 58 m. Table 1.2 includes the easting and northing grid references for the 16 operational turbines, substation, meteorological mast and entrance point (all of which would remain unchanged for the life extension). Other infrastructure associated with Ffynnon Oer Wind Farm includes concrete turbine foundations, turbine hard-standings, access tracks and cabling.
- 1.8.2 The area within the site boundary mainly consists of open undulating rough grazing grassland and moorland with areas of scrub and two watercourses, tributaries of the River Afan, running north-south within the southern section of the site boundary. Commercial conifer plantation borders the site boundary to the east and west. Access to the wind farm is via a 13 km forestry track through Natural Resources Wales (NRW) land that leads off Rhigos Road (A4061) at grid reference SN 92873 04391.

Table 1.2: Locations of key infrastructure of Ffynnon Oer Wind Farm

Turbine Number/Infr astructure	Easting	Northing
1	284445	199516
2	284635	199396
3	284294	199247
4	284804	198587
5	284113	198637
6	284732	198813
7	284587	198979
8	284475	198435
9	284827	198339
10	284010	198143
11	284390	198639
12	284900	199302
13	285051	198998
14	285116	199234
15	284320	198983
16	284362	198084
Met Mast	284228	198553
Substation*	284870	198384
Wind Farm Entrance*	285042	199417

* Denotes approximate centre-point co-ordinates

Source: Nadara

1.9 The Application

1.9.1 Based upon the assessment work undertaken, and given no physical changes would be made to the operational scheme, the Proposed Life Extension is sought via a Section 73 application under the Town and Country Planning Act 1990 (as amended). This approach was agreed during pre-application discussions with NPTCBC. This ES Addendum accompanies the Section 73 application made to NPTCBC.

1.9.2 Planning condition 6 of the current permission states that:

'20 years after the date of commencement of electricity generation or at such time as electricity generation is substantially discontinued, whichever is the earlier, the site shall be restored in accordance with a scheme to be first submitted for the approval of the local planning authority.'

1.9.3 It is proposed that planning condition 6 is reworded as follows:

'30 years after the date of commencement of electricity generation or at such time as electricity generation is substantially discontinued, whichever is the earlier, the site shall be restored in accordance with a scheme to be first submitted for the approval of the local planning authority.'

1.9.4 Under the EIA Regulations, a change to a project that was EIA development may also be subject to an EIA. This addendum to the original ES is being submitted to support the Application.

1.10 Benefits of the Proposed Life Extension

1.10.1 Following a recommendation report by the independent Climate Change Committee (CCC), Wales has committed to net zero greenhouse gas emissions (GHG) by 2050 and the Welsh Government (WG) has set a target for 70% of electricity consumption to come from renewables by 2030 and 100% by 2035.

1.10.2 Energy Use in Wales, Third Edition⁵ states *'...electricity consumption trends and progress towards these targets are set to change as Wales transitions away from fossil fuels. The adoption of electrification technologies, though currently*

⁵ Energy Use in Wales. Available at: <https://www.gov.wales/sites/default/files/publications/2024-10/energy-use-in-wales-report-2022.pdf> [Accessed 25 February 2026]

modest, is gaining momentum, and their future uptake will increase electricity consumption...Welsh electricity demand is projected to at least double and potentially triple in all CCC net zero pathways' up to 2050. Therefore, to meet the demand of the projected increased electricity consumption and to meet the WG targets for electricity consumption to come from renewables, renewable energy generation must make efficiencies and increase significantly and rapidly. One way to make efficiencies is to extend the operational life of schemes where it is feasible to do so.

- 1.10.3 In 2020, NPTCBC, in its Decarbonisation and Renewable Energy Strategy, recognised that tackling climate change is necessary and urgent. Renewable energy, including wind powered generating stations, are acknowledged as a means to reduce greenhouse gas emissions through a reduced reliance upon fossil fuels.
- 1.10.4 By generating renewable electricity to power the equivalent of an estimated 26,404 homes¹ per annum, extending the operational life of Ffynnon Oer Wind Farm would continue to make a positive contribution to meeting national energy, decarbonisation and climate change targets. Climate change policy and legislation is considered in greater detail in sub-section 1.12.
- 1.10.5 Furthermore, the Proposed Life Extension would both continue and increase its local socio-economic contribution for an additional 10 years.
- 1.10.6 This would include the associated business rates that the Applicant would continue to pay, as well as the operational and maintenance jobs and contracts associated with Ffynnon Oer Wind Farm, which would continue to contribute to the local economy. Currently, five technicians are employed to work on Ffynnon Oer Wind Farm, all who live within approximately 30 miles.

Community Benefits

- 1.10.7 The community benefit fund for the operational wind farm has supported a wide range of projects since 2006 including, amongst others:
 - Sports projects: Astro pitch slots and pitch maintenance for Afan community fitness suite; coaching and equipment support for the Afan Valley swimming club; sports kit for Croeserw Football Club; renovations of the Cymer Bowls Club house; and storage for Resolven Bowls Club;
 - Youth and family related projects: An after-school club (Cariad Communities CIC); and the replacement of flooring at a local family centre;

- Senior citizens related projects: Community transport bus for senior members of the Croeserw community;
- Food banks and warm hubs: Including Gilgal Community Organisation, Siop y Ddraig Goch, Cymer Afan Community Library and Friends of Croeserw; and
- Other community projects: Support for local craft groups, a local Women's Institute, allotment regeneration; and the South Wales Miners Museum.

1.10.8 The community benefit fund would continue throughout the proposed extended period of operation. The community benefit fund amount paid in 2025 (including a 10% administration fee) equated to £2,029.66 per installed MW (totalling £64,949.10 for that year). Under the current agreement, the community benefit fund will continue to track inflation until July 2026. The Applicant has proposed to increase the community benefit fund by 25% in the first year of the 10-year extension period, thereafter increasing annually in line with inflation.

1.10.9 Decommissioning of Ffynnon Oer Wind Farm would be addressed at the end of its 30 year operational life in a Decommissioning Plan which would meet the relevant planning conditions (6 and 16, as presented in Appendix A1.1).

1.11 Consultation

1.11.1 A scoping report was submitted on behalf of the Applicant on 12th August 2025 and a scoping opinion was issued by NPTCBC on 14th October 2025, resulting in the EIA scope presented in this ES Addendum. The full scoping report, scoping opinion and other relevant pre-application correspondence can be found in Appendix A1.2 of this volume of the ES Addendum.

1.11.2 As a result of the scoping consultation, a number of topics have been scoped out of this addendum, resulting in an overall proportionate assessment, where only those assessments with potentially significant effects have been included.

1.11.3 The following EIA assessments and the requirement for separate topic sections have been scoped out of the ES Addendum with agreement from NPTCBC:

- Landscape and Visual Impact Assessment (LVIA)*;
- Arboriculture;
- Traffic and Transport;
- Air Quality;

- Noise and Vibration*;
- Major Accidents and Incidents and Risk to Human Health*;
- Cultural Heritage;
- Geo-environmental;
- Agricultural Land and Soil Quality;
- Hydrology, Hydrogeology and Geology;
- Socio-Economics;
- Climate Change*;
- Waste.

* Denotes topics for which additional information has been requested by NPTCBC, but not a full EIA assessment (see NPTCBC Scoping Opinion section below).

1.11.4 Ecology and Ornithology are scoped into this ES Addendum.

NPTCBC Scoping Opinion

1.11.5 NPTCBC has requested that the following information is submitted with/within the ES Addendum:

Table 1.3: Additional information included with/within the ES Addendum

Topic	Requested Information	Location
Noise and Vibration	A statement demonstrating that the turbines are still within the acceptable noise limits, in regard to noise outputs due to the time that has passed since their installation	Appendix A1.3: Noise Summary Statement
Reasonable Alternatives	<i>'Any reasonable alternatives ... should be presented in the ES. The reasons behind the selection of the chosen option should also be provided ... including where environmental effects have informed the choices made. This assessment should also include an assessment of a 'do nothing' approach.'</i>	Sub-section 1.15 (under Reasonable Alternatives heading)
Currency of Environmental Information	The requested information is summarised below: • Survey data should:	Sub-section 1.15 (under Currency of Environmental

Topic	Requested Information	Location
	○ Be as up to date as possible; ○ Clearly set out its timing; ○ Clearly set out the nature of the data on which the assessment has been based. • Study areas should be clearly defined. • The impacts of operation and decommissioning activities should be considered (where these could give rise to significant environmental effects). • Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES. • A chapter setting out the overarching methodology for the assessment, which should distinguish effects that are 'significant' from 'non-significant'. • The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.	Information heading)
Cumulative Effects	<i>'All of the other development considered should be documented and the reasons for inclusion or exclusion should be clearly stated....</i> <i>The scope of the cumulative assessment should be fully explained and justified in the ES and in this case should consider the in combination effect of the development with the Mynydd Fforch Dwm Wind Farm development and the Pen Y Cymoedd</i>	Sub-section 1.15 (under Cumulative Effects heading); and sub-section 15.22: Cumulative Effects. Both these sections consider the in combination effect of the development with the Mynydd Fforch

Topic	Requested Information	Location
	<i>Wind Farm development. While it is noted that these developments have been consented since the current projects and therefore should have considered the existence of Ffynnon Oer, they would not have considered the extended life expectancy proposed by the current development and it is this aspect of the impact that the EIA would have to consider.</i> <i>The ES would also have to address if any new development schemes being considered or been consented (and not yet completed) have considered the Ffynnon Oer development as being removed in 2026 or if their assessment is based on the presence of Ffynnon Oer being retained.'</i>	Dwm Wind Farm development and the Pen y Cymoedd Wind Farm development.
Mitigation	<i>'Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent / minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.'</i>	Sub-sections 15.19, 15.20 and Appendix 15.1 provide details of mitigation and enhancement.
Population and Human Health	<i>'The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic</i>	Sub-section 1.15 (under Population and Human Health heading)

Topic	Requested Information	Location
	<i>chapters or within its own specific chapter.'</i>	
Transboundary Effects	<i>'Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.'</i>	Sub-section 1.15 (under Trans-boundary Effects heading)
L VIA	<i>'Any planning application would have to adequately address if the new schemes recently consented or currently going through the consenting process have considered the Ffynnon Oer Wind Farm being removed after 2026 or if their applications have assessed Ffynnon Oer existing past the consented period to ensure that the cumulative impacts have been adequately addressed, such as the current proposed Y Bryn Windfarm Development.'</i>	Sub-section 1.15 (under Cumulative Effects heading)
Climate Change	Information on potential impacts that climate change would have upon the development over its proposed life extension period;	Sub-section 1.15 (under Climate Change heading)
Waste	A review and update of the proposed decommissioning plans as part of the material change in circumstances for the Section 73 application.	Sub-section 1.15 (under Decommissioning heading)

Source: Natural Power

1.11.6 All other factors required to be assessed in an EIA, as listed in the 2017 EIA Regulations, have been included in this ES Addendum or agreed to be scoped out with consultees, due to predicted non-significant effects.

Ecology and Ornithology

1.11.7 As the specialist consultee on matters relating to ecology and ornithology, NRW was approached on 21st October 2025, for further advice on the scope of assessments for these topics. However, the response received from NRW

(22nd October 2025), was that, at that time, they were unable to accept any new pre-application consultations.

1.11.8 During a meeting held with NPTCBC (2nd April 2025), the planned survey approach and survey coverage area were discussed and agreed with the ecologist (contracted by NPTCBC).

1.11.9 A proportionate scope for the ecology and ornithology assessments in line with the scoping opinion and discussions held with NPTCBC is described in detail in Section 15: Ecology and Ornithology.

Public Engagement

1.11.10 Whilst not a statutory requirement for a Section 73 Application, Nadara has engaged with local community councils and ward councillors regarding the life extension to inform them about the proposed application. A Frequently Asked Questions document was issued in August 2025 to Clyne and Melincourt, Pelenna, Blaengwrach, Resolven and Rhigos community councils and Resolven and Tonna, Cimla and Pelenna, Cymer and Glyncorrwg, Blaengwrach and Glynneath West and Hirwaun ward councillors together with contact details should anyone wish to secure further information.

1.12 Legislative and Policy Framework

1.12.1 This sub-section sets out the UK, Welsh and NPTCBC renewable energy and planning policies considered within the application, along with the relevant legislation.

Renewable Energy Policy

UK

1.12.2 Since the original consent was granted in 2003, there have been a number of significant changes to the policy drivers affecting the development, deployment, and operation of renewable energy developments in the UK. These have been considered in this ES Addendum and are listed below.

1.12.3 The Climate Change Act 2008 was the first legally binding framework to reduce greenhouse gas emissions. The 2008 target was a reduction of 80% by 2050 compared to 1990 levels.

1.12.4 In May 2019, the UK Government declared a climate emergency. The CCC's Net Zero Report was also published in May 2019. The report responded to requests from the Welsh and Scottish Governments, asking the CCC to

reassess the UK's long-term carbon emissions targets. The report made recommendations for the UK economy including:

- UK overall: a new more ambitious, legally binding emissions target of net zero GHG by 2050, ending the UK's contribution to global warming within 30 years. This would replace the previous target of an 80% reduction by 2050 from a 1990 baseline (enforced by The Climate Change Act 2008 (2050 Target Amendment) Order 2019 which amended the targets in the Climate Change Act 2008); and
- Wales: a target of 95% reduction in GHG from 1990 levels, replacing the previous target of an 85% reduction. This was caveated with the fact that Welsh decarbonisation relies on UK government policy in a number of areas, and if the UK government did not commit to the CCC's targets, Wales would not be able to achieve their specific targets. Despite this caveat, in 2021, the WG superseded this recommendation from the CCC by introducing their own target of at least 100% emissions reductions by 2050⁶.

1.12.5 Also in 2021, the UK government adopted the sixth Carbon Budget through The Carbon Budget Order 2021⁷, setting a legally binding target of reducing emissions by 78% compared to 1990 levels by 2035.

1.12.6 Although the UK is making good progress in meeting its carbon reduction targets, future progress will require further expansion of low-carbon electricity to replace oil and gas for transportation, heating and industry⁸. Operation of the Ffynnon Oer Wind Farm for an additional 10 year period would result in an estimated reduction in CO₂ emissions of 39,308 tonnes per year² (or 393,076 tonnes over the proposed 10 year extension period³).

1.12.7 From this perspective, the proposal can be considered to have a disproportionately positive contribution relative to its scale and limited effects.

⁶ *The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021* (2021).

⁷ *The Carbon Budget Order 2021* (2021).

⁸ *Progress in reducing emissions - 2025 report to Parliament* - Climate Change Committee (2025). Available at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2025-report-to-parliament/> [Accessed 25 February 2026]

Wales

Wellbeing of Future Generations (Wales) Act 2015

1.12.8 The Well-being of Future Generations (Wales) Act 2015 creates a legal obligation on public bodies to improve, amongst other things, the environmental well-being of Wales. It also compels public bodies to set objectives that contribute to achieving seven well-being goals, including:

- A prosperous Wales, described as *'An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work'*.
- A resilient Wales, described as *'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)'*.
- A globally responsible Wales, described as *'A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being'*.

1.12.9 Two fundamental themes are Sustainable Development and the Sustainable Development Principle. The Act (in Section 2) defines sustainable development as: *'...the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving well-being goals.'*

1.12.10 By reducing carbon emissions, the Proposed Life Extension would contribute to Wales' current energy requirements, without compromising the ability of future generations to meet their own needs. Further, the Proposed Life Extension contributes to the Act's well-being goals, particularly 'A prosperous Wales' through decarbonisation, the ongoing use of existing infrastructure (resource efficiency) and continued employment with operations and maintenance jobs.

Environment (Wales) Act 2016

- 1.12.11 The Environment (Wales) Act 2016 placed new duties on the WG to ensure GHG emissions reduce, as well as introducing a carbon budgeting method to measure progress towards reducing emissions. It set a target for an 80% reduction in emissions compared to the baseline (1990 emission levels) by 2050 and introduced a duty to set interim emissions targets for 2020, 2030, and 2040.
- 1.12.12 Wales met its first carbon budget target of an average 23% reduction in carbon emissions (2016-2020), with an average 28% reduction compared to the baseline (1990 emission levels).
- 1.12.13 In 2021, the Welsh Ministers updated the interim targets via the Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2020. The 2030 target for carbon emission reduction was increased from 45% to 63% lower than the baseline; the 2040 target from 67% to 89%; with the zero emission target remaining at 2050.
- 1.12.14 Wales' emissions in 2023 were 38% lower than the baseline, mainly due to an increase in the production of electricity from renewables⁸. Although Wales is on track to meet its second carbon reduction target (an average of 37% reduction over 2021-2025 compared to baseline levels), the achievement of future targets will be more difficult, with the Climate Change Committee stating that - '*Wales must now accelerate action to ensure it is on-track to meet its future carbon budgets and the Net Zero target*'⁹.

NPTCBC

- 1.12.15 NPTCBC's Environment Strategy (2008 – 2026)¹⁰ has the following objectives that are supported by the Proposed Life Extension:

- Adapt to climate change;
- Minimise pollution;

⁹ Climate Change Committee Progress Report: Reducing emissions in Wales, June 2023. Available at: <https://www.theccc.org.uk/wp-content/uploads/2023/06/Progress-Report-Reducing-emissions-in-Wales.pdf> [Accessed 25 February 2026]

¹⁰ Neath Port Talbot Environment Strategy 2008 – 2026 (2008). Available at: <https://media.npt.gov.uk/media/rmjl5tiq/environment-strategy.pdf?v=20240916161924> [Accessed 25 February 2026]

- Increase energy and resource efficiency; and
- Develop in a sustainable way to create a long-term benefit for the people of our county.

1.12.16 NPTCBCs Decarbonisation and Renewable Energy Strategy¹¹, was published in May 2020 both as a response to the WG declaration of a climate emergency and also to provide leadership in reducing carbon emissions within its jurisdiction. The vision laid out in the document is *'To introduce a series of interventions and improvement measures across the County Borough to maximise the economic, social and environmental benefits and opportunities that the decarbonisation agenda provides.'* The document mainly relates to actions relating to the council's own activities but clearly demonstrates the alignment between the Proposed Life Extension and NPTCBC's own priorities.

Planning Policy

Wales

Future Wales: The National Plan 2040

1.12.17 Future Wales – The National Plan¹², published 24th February 2021, is a 20-year national development plan that covers the whole of Wales. It has been produced by WG and covers the period up to 2040. The purpose of Future Wales is to ensure the planning system at all levels is consistent with, and supports the delivery of, WG strategic aims and policies (including those in Planning Policy Wales (PPW), the Wales Infrastructure Investment Plan and Regional Economic Frameworks). It was prepared with regard to various WG policies and legislation, including:

- Well-being of Future Generations (Wales) Act 2015;
- Environment (Wales) Act 2016;
- Natural Resources Policy (2017)¹³; and

¹¹ *Decarbonisation and Renewable Energy Strategy* (2020). Available at: <https://media.npt.gov.uk/media/ushdtddq/dare-the-neath-port-talbot-decarbonisation-and-renewable-energy-strategy.pdf?v=20240724153038> [Accessed 25 February 2026]

¹² *Future Wales – The National Plan 2040* (2021). Available at: <https://gov.wales/future-wales-national-plan-2040> [Accessed 25 February 2026]

¹³ *Natural Resources Policy*, Welsh Government, 2017. Available at: <https://www.gov.wales/sites/default/files/publications/2019-06/natural-resources-policy.pdf> [Accessed 25 February 2026]

- Prosperity for All: A Low Carbon Wales (March 2019)¹⁴

1.12.18 The Planning (Wales) Act 2015 requires that any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Well-being of Future Generations Act 2015.

*Planning Policy Wales (PPW) (Edition 12)*¹⁵

1.12.19 Planning Policy Wales (PPW) (Edition 12) provides planning policy guidance for land use in Wales from the WG, and was adopted in February 2021. National Planning Policy in Wales comprises of PPW, a series of Technical Advice Notes (TANs), Mineral Technical Advice Notes (MTANs) and policy clarification letters.

1.12.20 *'The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties...'*

1.12.21 Paragraph 3.30 of PPW sets out that WG declared a climate emergency in 2019, in order to coordinate action nationally and locally to help combat the threats of climate change. It further sets out that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.

1.12.22 PPW states in Paragraph 5.71 that *'Low carbon electricity must become the main source of energy in Wales.'* It also states that overall power demand is expected to increase as a result of increased electrification of transport and heat. Paragraph 5.7.7 states that *'The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to*

¹⁴ *Prosperity for All: A Low Carbon Wales*, Welsh Government, 2019. Available at: https://www.gov.wales/sites/default/files/publications/2019-06/low-carbon-delivery-plan_1.pdf [Accessed 25 February 2026]

¹⁵ *Planning Policy Wales, Edition 12* (2024). Available at: <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf> [Accessed 25 February 2026]

tackling climate change. The planning system should...maximise renewable and low carbon energy generation’.

1.12.23 In Section 5.9 Renewable and Low Carbon Energy, Paragraph 5.9.1 PPW states that: *‘Local authorities should facilitate all forms of renewable and low carbon energy development and should seek cross-department co-operation to achieve this. In doing so, planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved. Planning authorities should seek to maximise the potential of renewable energy by linking the development plan with other local authority strategies, including Local Well-being plans and Economic/Regeneration strategies.’*

1.12.24 Paragraph 5.9.29 includes some guidance specifically on life extensions, stating that *‘the extension and re-powering of existing renewable energy infrastructure is important in meeting renewable energy and decarbonisation targets.’* PPW states that planning authorities should support schemes such as repowering and life extension projects as they will be important in meeting decarbonisation and renewable energy targets. It is also suggested that it would be beneficial for planning authorities to develop broad criteria for determining life extension applications subject to potential additional impacts of the scheme.

NPTCBC

1.12.25 The Neath Port Talbot Well-being Plan (2023-2028)¹⁶, which builds on the Well-being of Future Generations (Wales) Act 2015, sets out its well-being objectives, which include to *‘ensure all our communities are thriving and sustainable’*. The Plan states the importance of the natural environment to support healthy lifestyles and sustainable communities within NPT. It also stresses NPT’s importance as a leader in renewable energy, stating that it has the highest capacity for onshore renewables in Wales, and that collective action should be taken to tackle the climate emergency and reduce carbon use to net zero by 2030.

¹⁶ Well-Being Plan, 2023-2028, Neath Port Talbot. Available at: <https://www.nptpsb.org.uk/media/t5mkemvv/wellbeing-plan-2023-28.pdf?mediadirect=false&v=20240814130224> [Accessed 25 February 2026]

1.12.26 NPTCBC's Environment Strategy (2008 – 2026)¹⁷ has the following objectives that are supported by the Proposed Life Extension:

- Adapt to climate change;
- Minimise pollution;
- Increase energy and resource efficiency; and
- Develop in a sustainable way to create a long-term benefit for the people of our county.

1.12.27 NPTCBCs Decarbonisation and Renewable Energy Strategy¹⁸, was published in May 2020 both as a response to the WG declaration of a climate emergency and also to provide leadership in reducing carbon emissions within its jurisdiction. The vision laid out in the document is *'To introduce a series of interventions and improvement measures across the County Borough to maximise the economic, social and environmental benefits and opportunities that the decarbonisation agenda provides.'* The document mainly relates to actions relating to the council's own activities but clearly demonstrates the alignment between the Proposed Life Extension and NPTCBC's own priorities.

1.12.28 In 2024, NPTCBC released its Local Area Energy Plan¹⁹, which presents the vision for NPTCBC's future energy as a net zero system through a roadmap of actions that span building, transport, generation and networks, and industry.

1.12.29 NPTCBC formally adopted their LDP²⁰ (2011-2026) in January 2016. This document is designed to guide when, where and how much future development will take place in the NPTCBC area. The Annual Monitoring Review of the LDP was undertaken in 2020, which concluded that a

¹⁷ Neath Port Talbot Environment Strategy 2008 – 2026 (2008). Available at: <https://media.npt.gov.uk/media/rmjl5tiq/environment-strategy.pdf?v=20240916161924> [Accessed 25 February 2026]

¹⁸ Decarbonisation and Renewable Energy Strategy (2020). Available at: <https://media.npt.gov.uk/media/ushdtddq/dare-the-neath-port-talbot-decarbonisation-and-renewable-energy-strategy.pdf?v=20240724153038> [Accessed 25 February 2026]

¹⁹ Neath Port Talbot Local Area Energy Plan 2024. Available at: <https://democracy.npt.gov.uk/documents/s98856/SB%20NPT%20LAEP%20Final.pdf> [Accessed 25 February 2026]

²⁰ Neath Port Talbot Local Development Plan 2011-2026 https://api.npt.gov.uk/asset?url=https%3A%2F%2Fmedia.npt.gov.uk%2Fmedia%2Fca2fbumd%2Fldp_written_statement_jan16.pdf%3Fv%3D20240823155047 [Accessed 25 February 2026]

Replacement LDP (RLDP)²¹ will need to be prepared covering a 15 year plan period (2025 – 2035), with a base date of 1 April 2020. NPTCBC sought views on the RLDP draft Delivery Agreement ending in September 2021. The Delivery Agreement²² was subsequently approved by the WG on October 2023 and allows NPTCBC to formally commence preparation of the RLDP. The Delivery Agreement sets out a 3.5 year process to an anticipated adoption of an RLDP in April 2027, with a planned end date of 2038.

1.12.30 The LDP contains a number of general and specific policies which are relevant to the consideration of this life extension application and which were not in place at the time of the original consent.

1.12.31 Paragraph 1.1.16 of the LDP recognises the significant potential for exploitation of wind resource in NPTCBC area.

1.12.32 Key Issue (KI) 1 in the LDP (p.16) is that *'The causes and consequences of climate change will need to be addressed, including the increased risk of flooding'. KI11 says that 'There is a need to balance the impact of development on the countryside, landscape and coast, in particular the exploitation of mineral and renewable energy resources.'*

1.12.33 The following objectives in the LDP are of relevance to the Proposed Life Extension:

- Overarching Objective 1 (p.19) *'Minimise the causes and consequences of climate change through reduced greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development.'*; and
- Area Based Objective 19 *'To make a proportionate contribution towards the energy needs of Wales with a focus on renewable energy'.*

1.12.34 The following Strategic Policies in the LDP are of relevance to the Proposed Life Extension:

²¹ Replacement Local Development Plan (RLDP) 2023-2038. Available at: <https://www.npt.gov.uk/planning-and-building-control/planning-policy/replacement-local-development-plan-rldp-2023-2038/> [Accessed 25 February 2026]

²² Replacement Local Development Plan (RLDP) Delivery Agreement. Available at: <https://www.npt.gov.uk/planning-and-building-control/planning-policy/replacement-local-development-plan-rldp-2023-2038/delivery-agreement/> [Accessed 25 February 2026]

- SP1 - Climate Change: *'Provision will be made for the County Borough's appropriate contribution to renewable and low carbon energy generation.'* The LDP recognises that climate change is likely to affect the environment and future development of NPTCBC area, that it is necessary to reduce GHG emissions as far as reasonably possible to minimise the causes of climate change, and that these issues are of such fundamental importance that climate change is seen as an overarching matter to be addressed by all topic areas;
- SP2 - Health: Points out that policies seek to ensure developments do not increase the number of people exposed to significant levels of pollution;
- SP16 - Environmental Protection: *'Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures: 1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels; and 3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.'*;
- SP18 - Renewable and Low Carbon Energy: *'A proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. This will be achieved by: 1. Encouraging where appropriate, all forms of renewable energy and low carbon technology development'*;
- RE1 - Criteria for the Assessment of Renewable and Low Carbon Energy Development: *'Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria: 1. Large scale wind farm developments (>25 MW) will be expected to be located within the boundaries of the refined Strategic Search Areas. 2. Proposals for wind farms of any size outside the SSAs will only be permitted where it is demonstrated that there will be no unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure... 4. All renewable energy or low carbon energy development proposals will be required to demonstrate that: (a) Measures have been taken to minimise impacts on visual amenity and the natural environment; (b) There will be no unacceptable impacts on residential amenity; (c) The development will not compromise highway safety; (d) The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and (e) There*

are satisfactory proposals in place for site restoration as appropriate.' To note, this policy pre-dates, and does not align with, Future Wales; and

- SP21 - Built Environment and Historic Heritage: *'The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures: Safeguarding features of historic and cultural importance.'*

1.12.35 The LDP has not been updated since adoption of Future Wales and therefore does not reflect the extant national policy situation, including reference to Pre-Assessed Areas (PAAs) and how onshore wind should be assessed in relation to them.

Conclusion

1.12.36 Government policy is of particular relevance to renewable energy projects. Such policy, directed at the need to reduce greenhouse gas emissions, and move towards sustainable environmental energy practices, is clearly not just of national but international importance.

1.12.37 A key issue that must be addressed is the balance to be struck between the Government's approach to renewable energy and the policy framework in place at a local level. The WG has made very clear its commitment to both energy saving and renewable energy sources as ways of meeting its commitments to reduce emissions.

1.12.38 There are policies within both the NPTCBC LDP and its energy strategies which are positive towards the goal of delivering renewable energy sources.

1.12.39 The NPTCBC LDP was adopted in January 2016, predating most of the more recent policy and legislation responding to the Global Climate Emergency described elsewhere in this section.

1.12.40 Nevertheless, as a life extension of an existing renewable generating station which allows for a significant continued level of generation without any additional effects over and above those which have already been deemed to be acceptable, the Proposed Life Extension enjoys a substantial level of general support from the vision and strategic objectives of the LDP.

1.12.41 Further, whilst the detailed policies of the LDP are perhaps not as focused on delivering on climate change as they might have been had they been prepared now rather than in the period up to 2016, and do not specifically address the potential for extending the life of an existing generation station, by continuing the production of clean, renewable energy, the Proposed Life Extension aligns with the relevant policies of the LDP. This further enhances

the wider level of support that the operational Ffynnon Oer Wind Farm currently enjoys under the strategic LDP policies. It is concluded therefore that the Proposed Life Extension is supported by the NPTCBC LDP.

1.13 Structure of the ES Addendum

1.13.1 The structure of this ES Addendum matches that of the original ES. Volume 1 comprises the main sections and appendices; and Volume 2 the figures. Section numbers match those of the original ES. Table and sub-section numbers follow on from the last number presented in the ES to avoid any confusion when cross referencing.

1.13.2 The main sections included in this ES Addendum and the author are as follows:

- Section 1: Introduction (Natural Power);
- Section 15: Ecology and Ornithology (Natural Power); and
- Section 17: Summary of Predicted Effects (Natural Power).

1.13.3 The original ES was prepared in accordance with planning guidance, policy and regulations which were relevant at the time (early 1990s). Natural Power, on behalf of the Applicant, has prepared this ES Addendum in order to ensure that the information presented to NPTCBC is up to date and affords them the opportunity to make a robust decision on the potential effects of the Proposed Life Extension of the wind farm considering relevant policy and guidance. Any additional requirements now in place as a result of the 2017 EIA Regulations are considered within this ES Addendum to ensure that the EIA is fully compliant with current legislative requirements. The original ES should be read in conjunction with this ES Addendum.

1.14 Project Team

1.14.1 The Applicant has employed Aberystwyth-based consultants Natural Power to coordinate and submit the material required to support the Section 73 application. Natural Power has over 30 years of experience producing and managing EIAs, preparing and submitting planning applications and is a corporate member of the Institute of Sustainability and Environmental Professionals (ISEP) (formerly the Institute of Environmental Management (IEMA)).

1.14.2 Natural Power has managed the application and carried out the ecology and ornithology assessment.

1.14.3 In line with the 2017 EIA Regulations, to ensure the completeness and quality of the EIA, each consultant has included a statement of competence, outlining their experience and qualifications in Table 1.4.

Table 1.4: Statements of Competence

Discipline	Consultant	Experience
Ecology and Ornithology (section author)	Emma Anderson, Natural Power	An ornithologist with over four years of experience in consultancy focusing on renewable energy developments across the UK and the Republic of Ireland, including onshore wind, solar and hydro schemes, and onshore grid connections for offshore wind. Her experience includes conducting ornithology and ecology surveys for onshore wind developments such as Flight Activity Surveys, Breeding Bird Surveys, Breeding Wader Monitoring, Bat Activity and Roost Assessment Surveys, Phase 1 Habitat Surveys and Great Crested Newt eDNA and Habitat Suitability Index Assessment. Further consultancy experience for onshore renewables includes project management of onshore wind and battery energy storage system (BESS) development projects, survey planning and design, data management, analysis and presentation, and technical reporting. Additional ornithology experience includes seabird population monitoring, boat-based seabird surveys using the European Seabirds at Sea (ESAS) method and breeding raptor monitoring. Qualifications: MSc Ecology and Conservation, BSc (Hons) Zoology

Discipline	Consultant	Experience
Ecology and Ornithology (Ecology and Ornithology section approval)	Pete Clark, Natural Power	Pete has over 13 years of experience in the renewable energy industry, joining Natural Power in November 2024. His current role focuses on the delivery of environmental management of renewable energy projects, through provision of ornithological technical advice, reporting and project management. Prior to joining Natural Power, he gained a wealth of ornithological expertise and experience leading on large and complex development proposals in highly sensitive areas for birds. Pete's extensive knowledge of species ecology and survey methodologies underpins his understanding of the potential constraints relating to proposed developments, particularly wind farms and their impacts on raptors, wintering geese and black grouse. He has been involved with assessing the effectiveness of a range of mitigation measures in relation to birds and wind farms and overhead powerlines. Pete has authored and reviewed impact assessments for renewable developments and associated evaluation of potential effects on internationally designated sites as part of the Habitats Regulations process from Screening through to Derogation. Pete is a Schedule 1 licence holder, is a Northumberland Ring Scheme Group member, British Trust for Ornithology ringer, and ESAS qualified surveyor.

Discipline	Consultant	Experience
		Qualifications: MSc Wildlife Conservation and Management BSc (Hons) Geological Science
Ecology and Ornithology (Ecology and Ornithology section review)	Belinda Howell, Natural Power	Belinda began working in ecological consultancy in 2012, working initially on a variety of housing and other projects before focussing principally on solar farms since 2016. Belinda's work during this time has been varied but included; project and resource management, ecological survey design and management, biodiversity net gain calculations, mitigation recommendations, Natural environmental impact assessments, discharge of post-consent planning conditions, post construction monitoring and client and consultee liaison. Belinda has been involved in multiple research projects looking into ecological and natural capital effects of solar farms and is vice chair of Solar Energy UK's Natural Capital Working Group and preparing articles on Biodiversity Net Gain values of solar farms as well as leading the "bats and solar farms" sub-group. Overall, Belinda has substantial experience of delivering ecological services during all phases of a project from feasibility through to long-term operational monitoring, particularly within the solar industry. Qualifications: BSc (Hons) Environmental Science

1.15 Other Matters

1.15.1 This section of the ES Addendum addresses matters raised within the NPTCBC scoping opinion for which additional information has been requested by NPTCBC, but which are not covered in Section 15 (Ecology and Ornithology) or Section 17 (Summary of Predicted Effects).

Reasonable Alternatives

1.15.2 Part 5 Regulation 17 of the EIA Regulations requires that ESs include a description of the reasonable alternatives to the proposed development *'which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment'*.

1.15.3 The alternative option to extending the operational life of the wind farm is the 'do-nothing' approach which would mean decommissioning Ffynnon Oer Wind Farm once its current period of consent has ended (31st July 2026). Such an option would present a loss of renewable energy capacity within the South Wales region, as well as impacting on renewable energy targets set by both the Welsh and UK Government. The loss of the existing capacity would also negatively impact the aims and delivery of the Neath Port Talbot Local Energy Plan¹⁹.

1.15.4 Technical assessment across many of Nadara's sites has demonstrated that if wind farms are operated and maintained in line with best practice, they can continue to operate safely and efficiently beyond their original lifespan.

1.15.5 Any potential significant effects on the environment as a result of the Proposed Life Extension are assessed in Section 15 which concludes no significant effects. Given this application is to simply extend the life of the wind farm by an additional 10 years, with no physical changes to the wind farm, this is considered the most suitable option at present to continue contributing towards renewable energy targets with no delay in doing so.

EIA Methodology and Currency of Environmental Information

1.15.6 All other technical assessments, besides Ecology and Ornithology, have been scoped-out of the ES Addendum in agreement with NPTCBC. The ES Addendum does not include a separate section that sets out the overarching methodology for a range of assessments, therefore methodology is covered specifically in the Ecology and Ornithology section itself. Section 15 provides

details of all ecological and ornithological surveys undertaken as part of the assessment, and reports on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

- 1.15.7 Consideration is given to relevant legislation, planning policies, and applicable best practice guidance documents throughout this ES Addendum (Section 1 and Section 15).

Cumulative Effects

- 1.15.8 The scoping opinion received from NPTCBC indicated that although LVIA can be scoped out of the EIA, the application to extend the life of Ffynnon Oer wind farm should *'adequately address if the new schemes recently consented or currently going through the consenting process have considered Ffynnon Oer Wind Farm being removed after 2026 or if their applications have assessed Ffynnon Oer existing past the consented period to ensure that the cumulative impacts have been adequately addressed, such as the current proposed Y Bryn Wind Farm Development.'*
- 1.15.9 A data search was undertaken to develop a list of wind farm schemes that are operational, under construction, consented or in planning with turbines within a radius of 10 km of the nearest Ffynnon Oer turbine. The ES of each of these wind farms was reviewed to assess whether or not their EIAs had assessed Ffynnon Oer Wind Farm as a permanent feature.
- 1.15.10 The list of these schemes is provided in Table 1.5 below. None of the listed wind farms considered the decommissioning of Ffynnon Oer Wind Farm in their ESs - that is, that they all considered Ffynnon Oer a permanent feature of the landscape during the EIA process.
- 1.15.11 The cumulative effects of the Proposed Life Extension on ecology and ornithology are assessed in Section 15.22 of this ES Addendum.

Table 1.5: Wind farm schemes consented since Ffynnon Oer Wind farm, or currently or in planning, with turbines within 10 km of the nearest turbine

Name of Wind Farm, LPA	Planning Ref.	Planning Stage	Number of Turbines	Turbine tip height (m)	Distance from nearest turbine (km)
Pen y Cymoedd	12.04.09.26C	Operational	76	144.5	0.47
Melin Court	P2014/0883	Consented	5	149.9	0.95
Mynydd Fforch Dwm	P2022/0216	Consented	6	200	1.04
Foel Trawsant	P2022/0350	Consented	11	145	3.48
Y Bryn	P2018/0153	Refused	18	206 to 250	4.56
Llynfi Afan Renewable Energy Park	P2022/0517	Operational	12	118	4.94
Upper Ogmore	P/10/844/FU L	Consented	7	130-149.9	6.67
Maesgwyn Extension	DNS CAS-02084-T4Z8W4	Consented	4	125	7.59
Maesgwyn	DNS Ref: DNS/3213662	Operational	13	120	7.91

Source: Natural Power

Mitigation

1.15.12 Section 15: Ecology and Ornithology, describes the delivery of measures (mitigation and enhancement initiatives) proposed to prevent / minimise adverse effects (through legal requirements or other suitably robust methods).

Population and Human Health

1.15.13 The 2017 EIA Regulations require that the direct and indirect significant effects of the Proposed Life Extension on population and human health are

considered. No material changes are proposed under this application and, therefore, no effects on population or human health are predicted. For example, traffic levels are anticipated to remain stable, resulting in no increased noise levels or risk of accidents.

1.15.14 Full maintenance schedules of the wind turbines and related infrastructure would continue over the extended operational period, further reducing the risk of accidents.

1.15.15 The cumulative effects of a development on population and human health should also be considered in combination with the effects of other developments (see Cumulative sub-section above for details of projects considered as having the potential to contribute to cumulative effects). No direct or indirect cumulative effects are expected from the Proposed Life Extension as no material changes would occur to the operational parameters currently experienced by the existing Ffynnon Oer Wind Farm.

Transboundary Effects

1.15.16 Schedule 4, Paragraph 5 of the Town and Country Planning (EIA) (Wales) Regulations 2017 requires a description of the likely significant transboundary effects to be provided in an ES and therefore consideration should be made as to whether the proposed development is likely to have significant impacts on another European Economic Area (EEA) State. Due to the nature and location of Ffynnon Oer Wind Farm, and because no physical changes are proposed, it is considered that there is no potential for transboundary impacts to occur as a result of the Proposed Life Extension.

Climate Change

1.15.17 The inclusion of climate change (and air quality) was introduced in 2017 EIA Regulations and so was not specifically covered in the original ES.

1.15.18 In terms of the potential effects of climate change on the Proposed Life Extension, it is considered that many of the key climate trends will not affect Ffynnon Oer Wind Farm due to its location and high elevation. The vulnerability of Ffynnon Oer Wind Farm to further climate change events such as increased temperatures (of up to 2°C), increased rainfall, and increases in wind speeds and sea levels have been considered. These climate effects are not considered to affect the Proposed Life Extension for the reasons outlined in Table 1.6.

Table 1.6: Climate change effects on the Proposed Life Extension

Climate Effect	Impact on Proposed Life Extension
Increased temperatures (of up to 2°C) / Extreme temperature events	Extreme temperature changes could damage infrastructure and materials. This will be managed through regular maintenance and replacement cycles of components. On-site health and safety for the workforce will be in place during short term extreme temperature events.
Storms and high winds	Whilst power generated by wind speeds increases with increasing wind speed, during high winds a cut out speed can be reached, triggering a shutdown to prevent unnecessary strain on the rotors. Wind turbines have robust braking mechanisms in place to shut down during high wind speeds.
Sea level rising and flooding	The operational wind farm is not anticipated to be affected due to its hilltop location and elevation.

Source: Natural Power

Decommissioning

1.15.19 Decommissioning impacts were discussed within the original ES.. At the time of decommissioning itself, relevant health and safety measures and guidance will be adhered to.

1.15.20 The Scoping Opinion received from NPTCBC under the heading 'Waste' advised that, due to the age of the development, the Applicant should review and update their proposed decommissioning plans as part of the material change in circumstances for the Section 73 application. As stated in Paragraph 1.10.9 above, the decommissioning of Ffynnon Oer Wind Farm would be addressed at the end of its 30 year operational life in a Decommissioning Plan, which would meet the relevant planning conditions (6 and 16, as presented in Appendix A1.1).

1.15.21 As an organisation with sustainability at its core, Nadara is committed to minimising the impacts of its operations on the environment. As part of

Nadara's wider approach to sustainability, circularity has been identified as one of the key areas of focus to deliver on this commitment. By focusing on circularity, this not only improves the efficient use of resources and reduces associated greenhouse gases but also supports the business achieving operational objectives. For example, at operational sites in the UK, Nadara is looking at ways to source second-hand parts, refurbish and reuse components wherever possible.

1.15.22 Through working with specialists and circular-focused supply chains, Nadara is actively supporting technological innovation to encourage the reuse of entire wind farm assets and their constituent parts for longer. Nadara has established, and continues to evolve, internal processes purposefully designed to promote resource efficiency and reduction and is fostering an internal culture that encourages a reuse, rethink and reduce approach to end-of-life wind farm resource management.

1.15.23 Nadara believes that there is a clear opportunity for wind farm decommissioning to be done in a more sustainable way. The key objectives are to maximum reuse and recyclability of wind farm components and materials.

1.15.24 The company is committed to adopting the following approach for decommissioning of all its wind farms:

- Identifying circular options for the decommissioning of existing wind farm parts, products and materials;
- Committing to evolve internal processes that will help establish material traceability;
- Taking a "no landfill" approach to end-of-life wind turbine blades;
- Working with external experts and internal resource to plan in advance the processes, technical approach and material solutions for circular decommissioning;
- Committing to wind farm decommissioning circularity by taking a Life Cycle Analysis (LCA) based approach to decision making to help create carbon savings;
- Responsibly sourcing and encouraging circular-minded suppliers and contractors through tender and procurement practices;
- Enabling positive stakeholder engagement and participation through all stages of development, construction and operation;
- Ensuring circularity practice during construction and decommissioning site works;

- Fostering circular-focused research and development, e.g. by supporting suppliers and contractors that innovate and find new methodologies that will help advance circularity within the sector; and
- Supporting the creation of circular jobs, skills and educational opportunities that will allow for long term sustainable employment within the local area as well as the wider region.

1.15.25 Forward planning of all decommissioning activities with a focus on delivering and capturing optimal circular focused material solutions presents the opportunity for Nadara to implement best practice for all of its onshore wind farms as and when they reach the decommissioning stage.

1.15.26 The environmental impact of wind farm decommissioning is a growing concern for both regulatory bodies and other interested parties. The Ffynnon Oer life extension will allow Nadara to not only demonstrate the advantages of sustainable decommissioning practices for end-of-life wind farms, but also to ensure that local communities, supply chains and stakeholders directly benefit from this new phase in the wind farm's lifecycle.