

Mynydd Ty-talywn Energy Park

Pre-Application Consultation Report

Prepared for Galileo 03 Ltd



April 2026

DNS CAS-03018-G7G6H7

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1 CONTEXT

- 1.1.1 This document and its accompanying appendices constitute the Pre-Application Consultation Report (herein referred to as “the Consultation Report”). It supports a planning application for a Development of National Significance (DNS) for the construction and operation of up to 6 wind turbines, ground mounted solar photovoltaic modules, substation, ancillary infrastructure works, habitat management, and works to facilitate vehicular access to the Site (hereafter referred to as the “Proposed Development”).
- 1.1.2 For DNS, applicants are required to undertake pre-application consultation under section 61Z of the Town and Country Planning Act 1990 (“1990 Act”), per Article 7 of the Developments of National Significance (Procedure) (Wales) Order 2016 (“DNSPWO”). This consultation must for a period of not less than 42 days in accordance with DNSPWO.
- 1.1.3 The document details how Galileo 06 Ltd (a part of Galileo Empower UK Ltd) (herein referred to as “the Applicant”), has complied with the relevant provisions of the 1990 Act and DNSPWO and associated legislation in relation to its statutory duties for pre-application consultation for the Proposed Development.
- 1.1.4 The minimum consultation requirements are set out in DNSPWO 8 & 9.
- 1.1.5 In accordance with Article 8 of the DNSPWO the Application must publicise a proposed application by:

(a) Giving requisite notice—

- i. by site display in at least one place on or near the land to which the proposed application relates for not less than 42 days;*
- ii. in writing to any owner or occupier of any land adjoining the land to which the proposed application relates; and*
- iii. by publication of the notice in a newspaper circulating in the locality in which the land to which the proposed application relates is situated; and*

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

- i. the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form;*
- ii. a plan which identifies the land to which the proposed application relates;*

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

1.1.6 In accordance with Article 9 of the DNSPWO, the Applicant must carry out consultation before applying for planning permission:

- (1) *The following persons or descriptions of persons are specified for the purposes of section 61Z(4) of the 1990 Act–*
 - a) *any community consultee;*
 - b) *any specialist consultee; and*
 - c) *any relevant person.*
- (2) *Where an applicant is required to consult a community consultee or a relevant person, the applicant must give the community consultee or the relevant person requisite notice in writing of the proposed application.*
- (3) *Where an applicant is required to consult a specialist consultee, the applicant must give the specialist consultee requisite notice in writing of the proposed application and enclose each of the documents referred to in article 8(1)(b) or provide a link to a website on which those documents can be found.*
- (4) *The applicant must have complied with paragraphs (2) and (3) and have given the specialist consultee time to respond in accordance with article 10(1) before an application is submitted.*

1.1.7 For the purposes of Article 9 of the DNSPWO, and 61Z(4) of the 1990 Act, in respect of this Application:

- 1.1.8 A “community consultee” is each Councillor representing each electoral ward in the County or County Borough Council in which the Site is situated; and the Community Councils in which the Site is situated (per Article 2 of the DNSPWO).
- 1.1.9 A “specialist consultee” is the persons and/or bodies specified in the Table in Schedule 5 of the DNSPWO which are relevant to the category within which the development falls under.
- 1.1.10 A “relevant person” is the person whom would usually make the decision for any secondary consent sought under the Application (per section 62G of the 1990 Act).
- 1.1.11 “Requisite Notice” is the provision of notice to community consultees and relevant persons using the DNSPWO Schedule 1 Form, and the provision of notice to specialist consultees in the DNSPWO Schedule 2 Form.
- 1.1.12 In line with Article 11(a) of the DNSPWO, this Consultation Report sets out how the Applicant complied with section 61Z of the 1990 Act and how the response to the consultation received from persons consulted under section 61Z(3) or (4) of the 1990 Act was accounted for by the Applicant. The Consultation Report includes the following as required by Article 11(2) of the DNSPWO, as outlined in **Table 1.1**.

Table 1.1 Requirements of the consultation report as per Article 11(2) of the DNSPWO.

Requirement:	Location in report:
(a) a copy of the notice referred to in article 8(1)(a)(1)	A description of this activity is contained in Chapter 4. A copy of the notice is included in Appendix 14.
(b) a declaration that the notice referred to in article 8(1)(a)(i) was displaying in accordance with the requirements of that article	A description of this activity is contained in Chapter 4. A declaration that the notice was displayed in accordance with the requirements of article 8(1)(a)(i) is included in Appendix 13.
(c) a list of the addresses of the persons who were given notice of the proposed application in accordance with article 8(1)(a)(ii) and a copy of the notice given to such persons	A description of this activity is contained in Chapter 4. A list of all addresses notified in accordance with article 8(1)(a)(ii) is included in Appendix 11.

(d) a copy of the publication referred to in article 8(1)(a)(iii)	A description of this activity is contained in Chapter 4. A copy of the newspaper notice in situ is included in Appendix 22.
(e) a declaration that the applicant has complied with the publication requirements in article 8(1)(b)	A description of this activity is contained in Chapter 4. The declaration that the applicant has complied with the publication requirements is contained Appendix 13.
(f) copies of all notices given to community consultees, relevant persons and specialist consultees in accordance with articles 9(2) and 9(3)	A description of this activity is contained in Chapter 4. Copies of the notices to community consultees, relevant persons and specialist consultees are included in Appendix 7
(g) a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 8 and 9(2), including confirmation of whether the issues raised have been addresses and, if so, how	The 'main issues and developer response' tables are contained in Chapter 4.
(h) copies of all responses received from specialist consultees with an explanation of the account taken of each response.	Copies of all responses from specialist consultees, with an explanation of the account taken is included in Chapter 5. Copies of each original specialist consultee response is included in Appendix 21.

1.1.13 Information relating to additional engagement and consultation activities undertaken is also included within this Consultation Report, along with details about how issues raised have been considered and addresses.

1.1.14 The remainder of this document is structured as follows:

- Chapter 2 – Non-statutory consultation and early engagement;
- Chapter 3 – Statutory consultees;
- Chapter 4 – Statutory consultation;
- Chapter 5 – Statutory consultation responses, by type; and
- Chapter 6 – Summary

2 NON-STATUTORY CONSULTATION

- 2.1.1 In accordance with best practise guidance provided by Planning and Environment Decisions Wales (PEDW), the Applicant undertook early engagement with communities to help identify key considerations for the Proposed Development.

Advertising non-statutory engagement opportunities

- 2.1.2 The Applicant sent 2,154 leaflets and feedback forms on 8th September 2023 to properties in the local area, to provide an introduction to the Proposed Development and share the details of the drop-in events. The feedback forms could be returned via freepost envelope so that local people should share their initial views on the proposals from an early stage. These properties were located within the Applicant's Primary Consultation Zone (PCZ).
- 2.1.3 The PCZ is a mailing zone created around the Proposed Development to help facilitate and guide engagement with the local community and outline the scope for hard copy correspondence.
- 2.1.4 The PCZ consisted of a radius of 3.5 km from the centre of the Site, as well as an additional buffer to ensure Cefn Cribwr was within the scope. The zone was determined to encompass the homes most local to the Site, including homes in the electoral divisions of Llangynwyd, Aberkenfig, and Pyle, Kenfig and Cefn Cribwr in Bridgend County Borough Council, and Margam and Taibach in Neath Port Talbot Council.
- 2.1.5 A copy of the introductory leaflet, feedback form and map showing the PCZ can be found in **Appendices 1, 2 and 3** of this report, respectively.
- 2.1.6 The early engagement drop-in events were also advertised by email notification to local political representatives, placing adverts in local newspapers, and through Facebook advertising.
- 2.1.7 Local political stakeholders, including community councils, local division representatives in Bridgend County Borough Council and Neath Port Talbot Council, and local Members of Parliament (MPs) and Members of the Senedd (MS) were emailed ahead of the launch of the public exhibition. The email provided an introduction to the Applicant, the Proposed Development, and an offer of a meeting. Meetings were subsequently held with the following political stakeholders during the non-statutory consultation period:

- Stephen Kinnock – MP for Aberafan Maesteg (formerly Aberavon);

- Stuart Baldwin, Climate Change Response Manager – Bridgend Council;
- Cllr Huw David – Bridgend Council;
- Chris Elmore – MP for Bridgend (formerly Ogmore);
- Huw Irranca-Davies MS – MS for Ogmore; and
- Llangynwyd Lower Community Council.

2.1.8 A newspaper advert was placed in the Western Mail on 8th and 15th September 2023. A copy of the published advert can be found in **Appendix 4**.

2.1.9 Advertising was also carried out via Facebook, within a 7 km radius of the Proposed Development Site boundary. The advert was shown on-screen 40,386 times to a total of 14,601 unique users ahead of the drop-in events. This resulted in 331 users clicking the link to the project website. A copy of the Facebook adverts can be found in **Appendix 5**.

Non-statutory consultation drop-in events

2.1.10 Two early engagement drop-in events were held on 20th and 21st September 2023 at local venues near to the Proposed Development. The drop-in events were used to launch and introduce the Proposed Development to the local community. The aims of the drop-in events were to explain the Proposed Development, build an understanding of and reasons for the Proposed Development, and engage with the local community to address any initial concerns.

2.1.11 The aims of non-statutory consultation were to:

- Outline the broad parameters of the Proposed Development;
- Gather feedback on key issues and options;
- Understand and develop responses to key community and stakeholder concerns;
- Reassure concerned stakeholders; and
- Build understanding of the Proposed Development with a wide range of stakeholders.

2.1.12 The Applicant held drop-in events at Kenfig Hill RFC (20th September, 4pm - 8pm) and Maesteg Sports and Social Club (21st September, 10am - 2pm).

2.1.13 To help explain the proposals, a suite of materials were made available at the drop-in events and on the project website (mttenergypark.co.uk) as part of the non-statutory consultation. The drop-in events included banners on the following topics:

- Welcome;
- Project overview;
- Planning process;

- Environmental Impact Assessment (EIA);
- Access and grid;
- Community Investment; and
- Timeline and next steps.

2.1.14 A copy of the non-statutory consultation banners can be found in **Appendix 6**.

2.1.15 The events included staff from the Applicant, and its consultant teams (including EIA consultation, landscape and visual consultant, and communications consultant) who attended to support the project and answer questions relevant to their specific discipline. Attendees could ask questions of the staff present.

2.1.16 Alongside feedback forms sent out with the original consultation leaflet, attendees could fill in a feedback form at the event to submit their views on the Proposed Development. Attendees were also provided with a contact number and email address, should they have any further questions about the Proposed Development or consultation process.

2.1.17 In total, 62 people attended the non-statutory, early engagement events.

Responding to non-statutory consultation

2.1.18 Feedback on the Proposed Development during the consultation could be submitted via an online feedback form, hardcopy feedback form by post, hardcopy feedback form at the exhibition, or via email.

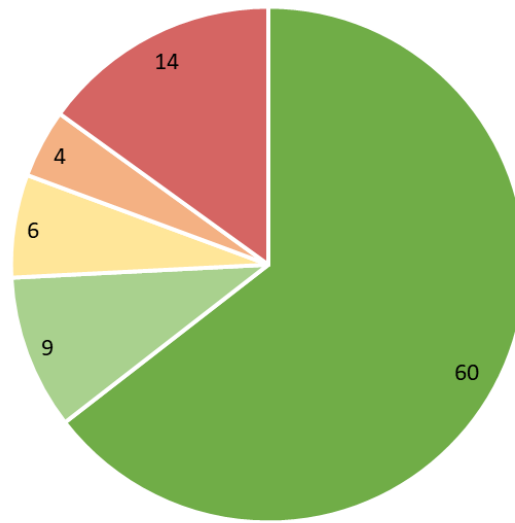
2.1.19 Respondents could obtain a hardcopy feedback form from the mailing to the PCZ (a freepost envelope was also provided), by collecting at the drop-in events (a freepost envelope was also provided for those who did not wish to fill it out at the exhibition), or by requesting one to be sent out, via email or phone.

2.1.20 All materials, including leaflets, feedback forms, newspaper adverts, Facebook adverts, and consultation boards were presented in English and Welsh. Welsh speakers were also available at drop-in events for those who wished to converse in Welsh.

Non-statutory engagement feedback

2.1.21 The Applicant received 95 feedback forms from the non-statutory consultation events. 75 percent of respondents agreed that Wales needs to generate more electricity from renewable energy sources.

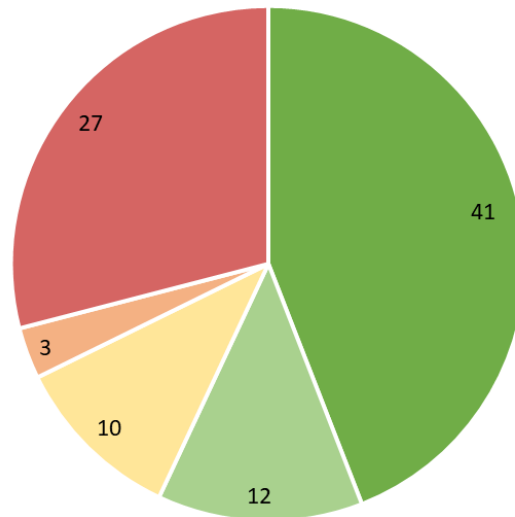
“Wales needs to generate more electricity from renewable energy sources.”



■ Strongly Agree ■ Slightly Agree ■ Unsure ■ Slightly Disagree ■ Strongly Disagree

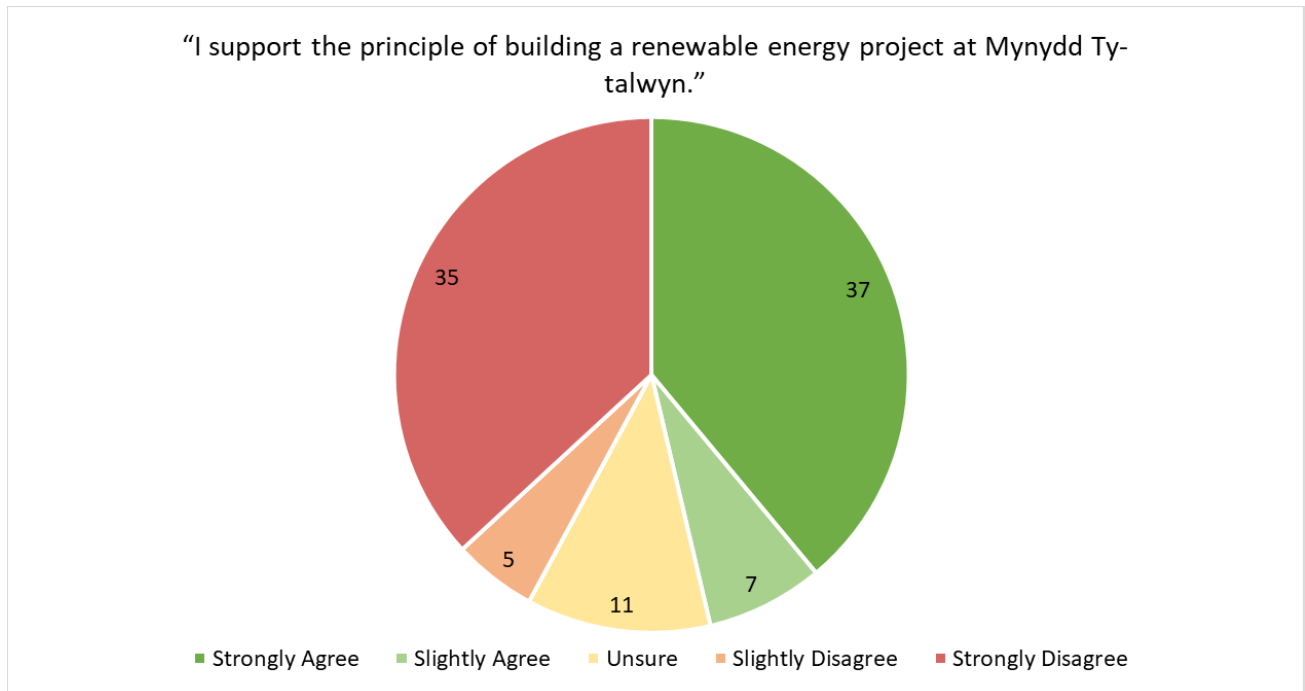
2.1.22 57 percent of respondents agreed that Onshore wind farms co-located with solar panels and battery storage are a good way to generate renewable energy.

“Onshore wind farms co-located with solar panels and battery storage are a good way to generate renewable energy”.

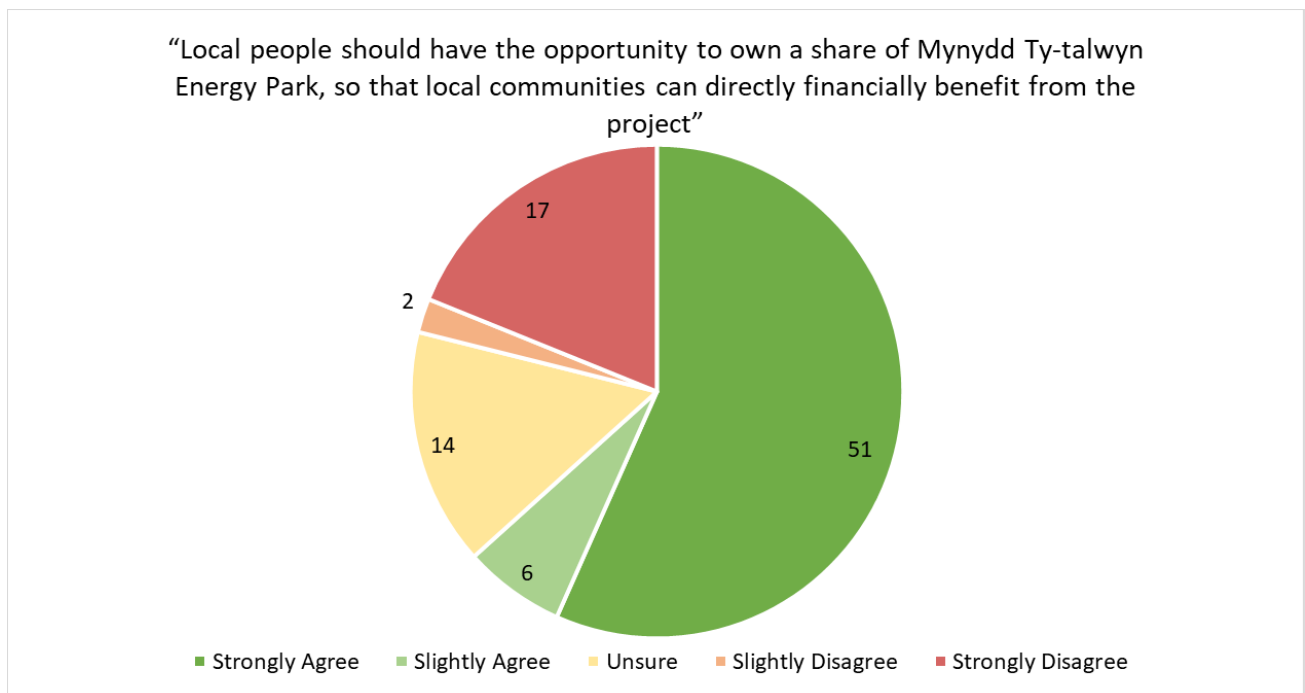


■ Strongly Agree ■ Slightly Agree ■ Unsure ■ Slightly Disagree ■ Strongly Disagree

2.1.23 46 percent of respondents supported the principle of building a renewable energy project at Mynydd Ty-talwyn.



2.1.24 64 percent of respondents believed that local people should have the opportunity to own a share of Mynydd Ty-talwyn Energy Park, so that local communities can directly financially benefit from the project.



2.1.25 A summary of the main feedback themes received to the non-statutory consultation are summarised below in **Table 2.1**, together with the Applicant's response.

Table 2.1: Themes of the non-statutory consultation.

Theme	Applicant's response
Environmental Impact	
Support for the environmental impact of the proposals, welcoming the project's contribution to reaching net zero.	Noted.
Concern over disruption to wildlife and nature.	Habitat and species surveys have been undertaken which have informed the design of the Proposed Development. This has included surveys for habitats, fungi, bats, Great Crested Newts, water vole and otter. This allowed for avoidance and mitigation of negative effects on local wildlife, as well as opportunities for enhancement including woodland planting, grassland management for fungi, planting native species for hedgerows, enhancing habitats for birds and planting native species to provide habitat for marsh fritillary butterflies.
Support for opportunities to conserve wildlife and additional potential ecological protection projects such as removal of Himalayan balsam.	Noted. Opportunities for enhancement include woodland planting, grassland management for fungi, planting native species for hedgerows, enhancing habitats for birds and planting native species to provide habitat for marsh fritillary butterflies.
Concern over siting of solar panels in areas of potential local heritage value.	Areas of known archaeological sensitivity have been avoided in the design and placement of the infrastructure for the Proposed Development. Archaeological surveys were undertaken including: Geophysical survey - to investigate areas of high archaeological potential, to gather information to establish the presence/absence, character and extent of any archaeological remains, and to inform the design and further evaluation or mitigation strategies. Trial trenching - to further investigate anomalies identified by geophysical survey.

	During construction signs of archaeological remains will also be monitored to ensure they are protected and preserved.
Landscape Impact	
Opposition to the number of turbines impacting the local landscape.	Due to further environmental and technical survey work the number of turbines within the Site has been reduced. The number of turbines was dropped from 10 to six.
Concerns over the height of the turbines.	As a part of the changes due to consultation feedback, the height of the turbines has been dropped from 230 m to tip height to 200 m to tip height, in order to reduce the visual impact whilst still optimising energy generation.
Support for the addition of wind turbines to the landscape compared to current infrastructure in the area.	Noted.
Construction	
Concern over the access to the Site and traffic.	Two accesses points are proposed into the Site; a northern access from the Maesteg Road and a southern access from the New Road, both utilising existing or historic access points. The northern access point would provide access for all construction material, abnormal loads and ongoing operational traffic. The southern access point would provide an additional access for abnormal loads associated with turbine deliveries. An Outline Construction Traffic Management Plan (CTMP) (ES Volume III, Appendix 12.1) has been prepared which sets out high level principles of how construction traffic will be managed.
Local economic impact	
Concern over loss of walking and mountain biking routes.	An Outline Access Management Plan (ES Volume III, Appendix 13.1) has been developed to manage public rights of way within the Site so that users can continue to enjoy these during the construction and operation phases. The aims are to protect the health and safety of all users, retain access to as many paths as possible and to identify areas for improvement and enhancement.
Concern over loss of tourism to the area.	The benefits to local tourism during construction is discussed in Chapter 13 Population

	(Environmental Statement (ES) Volume II). Chapter 13 Population also assesses impacts on tourism during operation and considers the studies that conclude wind farms do not result in negative impacts on tourism once operational.
Support for opportunities for training apprenticeship schemes for younger people and local employment.	Noted.
Location and technology	
Desire to see more offshore wind and tidal power, rather than an onshore project.	Onshore wind makes an important contribution to the UK's net-zero emissions targets by providing a readily available, cost-effective and clean energy source. Galileo is a wind and solar energy developer.
Preference for brownfield sites to be used for clean energy projects.	Brownfield sites often have their own constraints regarding contamination, infrastructure challenges, limited access and complex planning and permitting considerations. The majority of the Proposed Development lies within a Local Search Area identified within the Bridgend County Borough Council Local Development Plan as being suitable for wind and solar energy development. The Site benefits from excellent wind resource and is also located close to a grid connection point which lies approximately 3 km southwest of the Site.
Community Benefits	
Support for opportunities to retrofit and future proof local homes, as well as reduce energy bills directly.	Noted.
Support for opportunities to improve local infrastructure including roads between local communities, community services, and sports facilities.	Noted.
Support for community benefit fund supporting local organisations, including local environmental groups.	Noted.
Suggestions on how local ownership opportunities could improve local outcomes and services.	Noted.

2.1.26 Feedback from non-statutory consultation was collated and distributed to the project team and has been incorporated into the final design and subsequent EIA.

3 STATUTORY CONSULTEES

3.1 Overview

3.1.1 Article 9 of the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) (“the DNSPWO”) sets out that relevant statutory consultees are separated into three categories for the purposes of section 61Z(4) of the Town & Country Planning Act 1990 (“the 1990 Act”): community consultees, specialist consultees and relevant persons. In addition, Article 8 requires notice to be provided *“in writing to any owner or occupier of any land adjoining the land to which the proposed application relates.”*

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

3.2 Specialist consultees

3.2.1 In line with Schedule 5 of the DNSPWO, the below Specialist Consultees were identified.

3.2.2 Letters notifying the start of the statutory consultation period, including a copy of the Schedule 2 Notice was issued to the following specialist consultees on Friday 25th April 2025. An example copy is included in **Appendix 7**.

3.2.3 The specialist consultees identified were:

- Welsh Water;
- Neath Port Talbot Council (NPTC);
- Bridgend County Borough Council (BCBC);
- Flintshire Local Highway Authority;
- Natural Resources Wales;
- The Coal Authority;
- Welsh Government, Transport, Economic Infrastructure – Network Management Division;
- North and Mid Wales Trunk Road Agency;
- Network Rail;
- Cadw;
- The Fire and Rescue Authority;
- National Air Traffic Services (NATS);
- Ministry of Defence (DIO);
- Civil Aviation Authority (CAA); and

- Health and Safety Executive.

3.3 Community consultees

3.3.1 The DNSPWO states that Community Consultees are:

- Each Councillor representing each electoral ward in the County or County Borough Council in which the Site is situated;
- The Community Council(s) in which the Site is situated.

3.3.2 Community consultees are included in **Table 3.1** below.

Table 3.1: List of statutory community consultees.

Name	Role
Councillor Gary Haines	Ward Councillor for Aberkenfig, Bridgend County Borough Council
Councillor Malcom James	Ward Councillor for Llangynwyd, Bridgend County Borough Council
Councillor Rob G. Jones	Ward Councillor for Margam and Taibach, Neath Port Talbot Council
Councillor Dennis Keogh	Ward Councillor for Margam and Taibach, Neath Port Talbot Council
Councillor Laura Williams	Ward Councillor for Margam and Taibach, Neath Port Talbot Council
Mrs Louise Turner	Llangynwyd Lower Community Council, Local Community Council
Ms Cheryl John	Llangynwyd Middle Community Council, Local Community Council

3.3.3 Letters were also sent to a broader range of community representatives to inform them of the start of the statutory consultation on 17th April 2025. These stakeholders are listed in **Appendix 8**. An example copy of the letter issues is included in **Appendix 9**.

3.4 Schedule 1 Notices

3.4.1 In accordance with Article 8, letters and a copy of the Schedule 1 Notice were also sent to all relevant adjacent landowners and occupiers to inform them of the start of the statutory consultation on 21 April 2025. An example copy of the landowner letters and notice can be found in **Appendix 10**. A list of the property addresses for adjacent and adjoining landowners and tenants can be found in **Appendix 11**.

4 STATUTORY CONSULTATION

4.1 Statutory publicity overview

- 4.1.1 In line with the DNSPWO, the Applicant is required to carry out pre-application consultation. Articles 8 and 9 of the Order stipulate that the requirement in terms of scope, engagement, and length of the consultation period, alongside the requirements within section 61Z of the 1990 Act.
- 4.1.2 Per section 61Z(3) of the 1990 Act, the Applicant is required to publicise the proposed application in such a manner as is reasonable considered likely to bring it to the attention of a majority of the persons who own or occupy premises in the vicinity of the land. The below sections set out the means by which the Applicant ensured the broad publication of the application in accordance with this section.
- 4.1.3 The statutory consultation period ran from Saturday 26 April 2025 to Sunday 8 June 2025. The formal consultation lasted for 42 days, in accordance with Article 8(1)(b) of the DNSPWO. Where requested, an additional two weeks were provided for consultees to provide their response. This was provided to Neath Port Talbot and National Resources Wales consultees that asked for an extension to the deadline. Following this extension further comments were received from Bridgend County Borough Council in relation to highways, ecology, conservation and landscape and visual.
- 4.1.4 In addition to the statutory publicity, a number of non-statutory consultation and engagement methods were employed to ensure that the local community and interested parties had the opportunity to find out about and contribute to the consultation.
- 4.1.5 The aims of the statutory pre-application consultation were to:
- Set out final proposals, demonstrating how issues identified during earlier consultation have been accounted for and considered within the Proposed Development design;
 - Demonstrate how the proposals have evolved since non-statutory consultation, and how feedback has influenced this process;
 - Gain insight through listening to the views of local communities and other stakeholders about the updated proposals;
 - Ensure that the potential impacts of the Proposed Development have been taken into account as mitigation strategies are finalised;

- Provide a robust evidence base for the DNS application, to demonstrate how community and stakeholder feedback has influenced the Proposed Development, where possible; and
- Meet DNS criteria for adequacy of consultation.

4.1.6 A full summary of the outreach and consultation can be found below in the following sections.

4.2 Site notices

4.2.1 In line with Article 8(1)(a)(i) of the DNSPWO, the Applicant displayed site notices on or near the land to which the proposed application related for over 42 days, starting from 26 April 2025.

4.2.2 A copy of the notice and photographs in situ are included in **Appendix 12**. The site notices were checked regularly during the period they were in situ. Any damaged (e.g. where damaged by poor weather) or missing notices were replaced by new ones.

4.2.3 A declaration that the site notice was displayed around the Site to which the Proposed Development related for a period in excess of 42 days is included in **Appendix 13**.

4.3 Written notice

4.3.1 In line with Article 8(1)(a)(ii), 9(2) and 9(3) of the DNSPWO, letters and notices were sent out to owners or occupiers of land adjoining the land to which the proposed application relates, together with community consultees, relevant persons and specialist consultees. Details of the persons captured by these categories and the nature of notices sent to them are Outlined in **Section 3** above.

4.4 Newspaper notice

4.4.1 As required in Article 8(1)(a)(iii) of the DNSPWO, a notice was published in a locally circulating newspaper. The notice appeared in both the Glamorgan Gazette from Thursday 24th April 2025 and the South Wales Evening Post from 23rd April 2025. The Glamorgan Gazette publication has a circulation that includes the Bridgend area, and the South Wales Evening Post has a circulation that covers the Neath Port Talbot area, meaning both papers were suitable for the publication of the notice.

4.4.2 A copy of the notices can be found in **Appendix 14**.

4.5 Website

- 4.5.1 The project website for the Proposed Development was updated for the launch of statutory consultation (mttenenergypark.co.uk).
- 4.5.2 A link was provided from the project website to the dedicated Pre-Application Consultation webpage which contained more details about the statutory consultation, including the consultation events and deadline to respond, copies of the consultation documents and an online feedback form. The dedicated consultation webpage could be accessed via the following link: mttenenergypark.co.uk/pre-application-consultation.
- 4.5.3 All the relevant documents, including draft ES and relevant application documents, were uploaded onto the dedicated consultation website and available to view and download ahead of the consultation start date, Saturday 26 April 2025, accessed via the following link: mttenenergypark.co.uk/application-documents.
- 4.5.4 All statutory consultation documents remained on the consultation website past the consultation deadline for reference.
- 4.5.5 The following documents were available to view and download throughout the statutory consultation period (as outlined in **Table 4.1**):
- Draft ES, Figures and Technical Appendices;
 - Supporting standalone reports, such as the Planning Design and Access Statement;
 - Other draft application documents, such as the DNS Application form and Planning Drawings; and
 - All main statutory consultation materials including the feedback form and non-technical summary (NTS) of the draft ES. A copy of the statutory consultation pull-up stands and visualisations that were used at the face-to-face events, were also uploaded during the consultation period.

Table 4.1: Documents available as a part of the statutory pre-application consultation.

Reference to Article 8(1) of the DNSPWO	Document/Information
Article 8(1)(b)(i)	Draft DNS application form
Article 8(1)(b)(ii)	Site boundary plan
Article 8(1)(b)(iii)	Other plans, drawings and information, including: • Green Infrastructure Statement
Article 8(1)(b)(iii)	Statutory notice of a proposed application for a Development of National Significance
Article 8(1)(b)(v)	Planning, Design and Access Statement
Article 8(1)(b)(vi)	N/A

Article 8(1)(b)(vii)	Environmental Statement, including: • Volume 1: Non-Technical Summary • Volume 2: Written Statement (Chapters 1 to 16) • Volume 3: Technical Appendices • Volume 4: Figures
Article 8(1)(b)(viii)	N/A
Article 8(1)(b)(ix)	N/A

4.5.6 Example screenshots of the project website and dedicated consultation webpages can be found in **Appendix 15**.

4.6 Additional publicity

4.6.1 The Applicant took measures to advertise the statutory consultation widely among local communities and stakeholders in accordance with section 61Z(3) of the 1990 Act.

4.6.2 A bilingual (English and Welsh) leaflet advertising the start of statutory consultation was issued to 2156 addresses within the PCZ on Thursday 17th April. A copy of the leaflet can be found in **Appendix 16**. Email notifications were also issued those who had signed up for updated from the previous non-statutory consultation.

4.6.3 Letters announcing the launch of the pre-application consultation and offering a briefing on the proposals were issued on 17th April 2025 to stakeholders including community councils, local division representatives in Bridgend County Borough Council and Neath Port Talbot Council, and local MPs and MSs. These letters are available in **Appendix 23**. Some local political stakeholders attended public exhibition events during the pre-application period. Meetings were also held with the following political stakeholders during the statutory consultation period:

- Maesteg Town Council; and
- Members of Chris Bryant MP's office – MP for Rhondda and Ogmore.

4.6.4 Adverts were also placed in two local newspapers that are in circulation in the local area. The adverts appeared in the Glamorgan Gazette and South Wales Evening Post on Thursday 24th April 2025. Copies of the adverts in site can be viewed in **Appendix 17**.

4.6.5 Posters advertising the consultation were also distributed by the Applicant in the local area to ensure local people could find out about the consultation.

4.7 Statutory consultation materials

- 4.7.1 To help explain the proposals, a suite of materials were made available as part of the statutory consultation. The main public facing materials were a statutory consultation brochure, feedback form, pull-up stands and visualisations and NTS of the draft ES. Materials were made available to statutory consultees and the public in English and Welsh.
- 4.7.2 The statutory consultation brochure was available at the in-person exhibitions included information about the need for the Proposed Development; the vision for the site; an overview of the proposals and how these had developed since the non-statutory consultation; information about the Applicant; details of the proposed community benefit fund; and how to get involved in the consultation and provide feedback. An English and Welsh copy of the statutory consultation brochure can be found in **Appendix 18**.
- 4.7.3 The feedback form was developed to help obtain local views on the proposals which would be used to support the development of the application. The feedback form included a series of open and closed questions, and an English and Welsh copy can be found in **Appendix 19**.
- 4.7.4 A draft ES was produced for the statutory consultation. The provided an in-depth description of the Proposed Development, the significant effects it could have on the environment and the mitigation measures proposed to avoid, reduce and/or offset the potential impacts. A shorter NTS of the planning application was also produced and made available.

4.8 Statutory consultation events

- 4.8.1 The Applicant held a series of face-to-face public events to allow members of the local community to learn more about the proposals and ask questions to the project team.
- 4.8.2 Three face-to-face events were held at local, publicly accessible venues, including:
- Cefn Cribwr Athletic Club, CF32 0BA: Tuesday 29th April 2025, 4pm – 8pm;
 - Llangynwyd Village Hall, CF34 9SW: Wednesday 30th April 2025, 11:30am – 2:30pm; and
 - Coytrahen Community Centre, CF32 0EB: Wednesday 30th April 2025, 4:30pm – 8:30pm.
- 4.8.3 Across the three face-to-face consultation events, there were a total of 91 attendees.

4.8.4 Statutory consultation brochures, feedback forms, the planning application (including non-technical summary) (available on tablets), consultation banners and visualisations were produced and displayed at the face-to-face events, to provide information about the Proposed Development. The events included staff from the Applicant and its consultant teams (including EIA/planning consultant and communications consultant). The face-to-face events included banners on the following topics:

- Welcome;
- About the Applicant;
- Feedback from Autumn 2023 Consultation and Changes;
- Biodiversity and Access Improvements;
- Environmental Considerations;
- Community Offering; and
- Timeline and Next Steps.

4.8.5 A copy of the statutory consultation banners can be found in **Appendix 20**.

4.8.6 Attendees were encouraged to complete a feedback form at the event or fill in an online feedback form, send their feedback via email or complete and post a copy of the physical feedback form via the Freepost. Attendees were also provided with a contact number and email address should they have any further questions about the Proposed Development or consultation process.

4.9 Statutory consultation feedback

Consultee responses

4.9.1 In total, the Applicant received statutory consultation responses from 99 consultees, including 11 from statutory consultees and 88 from non-statutory consultees.

4.9.2 Extracts from each statutory consultee response are included in Chapter 5 Statutory Consultation Responses, alongside the Applicant's responses to the issues raised.

4.9.3 Non-statutory consultee feedback was also carefully considered and integrated into the updates to the application documents before final submission. Key feedback and themes, alongside the Applicant's response to issues raised, has been summarised in **Table 4.2** below.

Public responses

4.9.4 The Applicant received 88 feedback forms from the statutory consultation events. Approximately 25 percent of respondents supported the proposals and approximately 14 percent did not know.

- 4.9.5 68 percent of respondents claimed to support renewable energy.
- 4.9.6 Approximately 62 percent of respondents were interested in local people having the opportunity to own up to a 10 percent share of Mynydd Ty-talwyn Energy Park, so that local communities can directly financially benefit from the project.
- 4.9.7 A summary of the main feedback themes received to the statutory consultation, alongside the Applicant's response, are summarised below in **Table 4.2**.

Table 4.2: Themes of the statutory consultation.

Statutory consultation comments summary	Applicant's response
Landscape and visual	
Support for the proposal on the basis that it seems fair for the area and location	Noted – part of the Site lies within a Local Search Area identified within the Bridgend County Borough Council Local Development Plan as being suitable for wind and solar energy development.
Concerns about possible negative visual impact of the development, especially regarding turbine height	Following further environmental and technical survey work the number of turbines was reduced from 10 to 6. The tip height has also been reduced for all turbines from 230 m to 200 m to reduce visual impact. In response to consultation responses the solar array has been reduced from nearly 200 ha to some 63.7 ha. This is explained in more detail in ES Volume II, Chapter 3: Environmental Context and Reasonable Alternatives Considered. During the operational phase of the Proposed Development the LVIA concludes that the Proposed Development would introduce a large vertical scale of change to the landscape character and that whilst significant effects (in EIA terms) would be experienced up to a distance of 5km; the effects are expected to reduce when the proposed woodland screening matures. Significant visual effects (in EIA terms) have been concluded from various settlements up to a distance of c.3km from the site. However, given the scale of the development, this level of visual

	change is to be expected, and a significant effect does not equate to an unacceptable impact; views from the majority of properties within the settlements will be screened by intervening vegetation and buildings and at these distances (the closest settlement being Llangynwyd at 2km) effects would not be dominant or overbearing. More information on the Landscape and Visual Assessment can be found in ES Volume II, Chapter 8.
Concerns regarding cumulative effect of local wind farm developments, e.g., in the Caerau area	A Landscape and Visual Assessment can be found in ES Volume II, Chapter 8, including a cumulative assessment. It concludes that whilst the Proposed Development would contribute to significant cumulative effects in some locations, particularly in combination with wind farm developments and forestry operations across the upland areas, these effects would be localised and would form part of a broader pattern of upland landscape management that is increasingly characteristic of the region. As evidenced by the detailed viewpoint assessment (ES Volume III, Appendix 8.8), significant cumulative effects are primarily experienced by receptors in close proximity to the Site or with direct views toward it, with effects generally diminishing with distance and where screening by landform and vegetation is present. The viewpoint assessment confirms that no significant cumulative effects would be experienced from nationally designated landscape.
Visual impact of turbines could affect horses/horse riders	The Landscape and Visual Impact Assessment (ES Volume II, Chapter 8) considered users of public rights of way (PRoW). A number of PRoW pass through the Site and the surrounding landscape. Routes located within the Site itself would have the greatest potential for visibility of the Proposed Development. Beyond the Site

	potential for impacts to the view from the PRow network decreases. An Outline Access Management Plan (ES Volume III, Appendix 13.1) has been prepared which sets out mitigation measures that will effectively manage access to PRow ;this includes a number of measures regarding horse riders and includes recommendations by the British Horse Society.
Noise	
Concern regarding noise during the turbine's operation	Wind turbine noise would meet the Total ETSU-R-97 Noise Limits, following the implementation of mitigation measures. As the ETSU limits are achieved, no residual significant effects are expected when turbines operate. A reduced turbine operating mode would be adopted in order to reduce the noise of the turbines for certain wind speeds and directions. More information can be found in ES Volume II, Chapter 9: Noise.
Request for potential noise impact to be restated in more accessible language	The NTS (ES Volume I) presents the technical assessments in a clear and concise format to allow the public to understand a Proposed Development and its likely significant effects.
Request that construction be made as unobtrusive as possible	A CTMP and Construction Environment Management Plan (CEMP) will be developed to reduce impacts of construction. Detailed plans will be secured via planning condition, however, the application includes outline plans. The Outline CEMP (ES Volume III, Appendix 2.1), outlines how the construction will minimise impact on the environment and minimise disturbance, including noise and traffic. The Outline CTMP aims to ensure safe and efficient management of construction traffic, minimising disruption to the surrounding area. Detailed plans will be agreed with Bridgend County Borough Council and Neath Port Talbot Council prior to construction.

	An Outline CEMP has been prepared as a part of the planning application (ES Volume III, Appendix 2.1).
Construction traffic and transport	
Feeling that construction and its management should be trusted to experts	All site works will be undertaken in compliance with a CEMP and legislative and regulatory requirements. An Outline CEMP (ES Volume III, Appendix 2.1) has been prepared as part of the planning application. An appropriately qualified and experienced Principal Contractor will be appointed to oversee the strategic and day-to-day operations of the Proposed Development. It is the responsibility of the Principal Contractor appointed to ensure their works comply with legal requirements and are in accordance with any planning conditions, as well as in accordance with current guidance and best practice.
Concern regarding traffic level monitoring	To minimise adverse traffic and movement effects during construction, a CTMP, Abnormal Load Transport Management Plan and Access Management Plan would be agreed with Bridgend County Borough Council, Neath Port Talbot Council and South Wales Trunk Road Agency, in advance of construction. An Outline CTMP (ES Volume III, Appendix 12.1), Abnormal Load Delivery Route Assessment (ES Volume III, Appendix 4.2) and Access Management Plan (ES Volume III, Appendix 13.1) have been included in the planning application. The Applicant would establish a Community Liaison Forum, in collaboration with the Council and local Community Councils. The forum would allow the community to be kept up to date with project progress and allow communication on the provision of transport-related mitigation and publicise the timings of turbine component deliveries. The Community Liaison Forum would be maintained until construction is complete and the Proposed Development is operational.

Impact of access across the south facing bank of Cwm Risca Farm	The southern access track will cross Cwm Risca Lane and several PROW. All PROW would be kept open during the construction phase as far as is practicable and safe. Should this not be possible, there may be a requirement for some PROW to be temporarily diverted or temporarily closed for short periods of time, however, this will be kept to a minimum, and routes will be diverted where possible. An Outline Access Management Plan (AMP) is provided at ES Volume III, Appendix 13.1. It is anticipated that a detailed AMP would be conditioned as part of any forthcoming planning permission.
Access for HGVs via Ffordd-y-Gyfraith	Ffordd-y-Gyfraith is a C class road that passes through the Site in a south-east to north-west direction. This provides connectivity between turbine locations and the solar array areas via the internal Site tracks. Its use as the core route helps to minimise environmental impacts by reducing the need to build an extensive network of additional access tracks, requiring localised widening. During construction, a banksperson will be used within the Site to assist in the safe manoeuvre of construction vehicles. The general arrangement of the proposed highway access junctions is provided in figures at ES Volume IV, Figure 2.1: Proposed Development Layout and the Highway Junctions General Arrangements (ES Volume III, Appendix 12.3). Any areas of over-run required to facilitate the delivery of the abnormal load turbine components would remain in situ for the operational life of the Proposed Development. However, it is proposed

	to construct these areas using Grasscrete, or similar modular cellular product, to minimise the visual impact once the area has been allowed to revegetate. The Site access points would be inspected and maintained during the operational life of the Proposed Development.
Concerns about the risk to road user, especially on Fountain Hill and New Road	The southern access point to the Site would provide an additional access for abnormal loads only, associated with the delivery of turbine equipment. This would be an access only, with all retracted (to near standard articulated Heavy Goods Vehicle dimensions) abnormal load delivery vehicles leaving the Site through the northern access on Maesteg Road. To minimise adverse traffic and movement effects during construction, a CTMP, Abnormal Load Transport Management Plan and Access Management Plan would be agreed in advance with Bridgend County Borough Council and Neath Port Talbot Council. Outline and high-level plans have been included in this application (ES Volume III, Appendix 12.1, Appendix 4.2 and Appendix 13.1, respectively) The Applicant would establish a Community Liaison Forum, in collaboration with the Council and local Community Councils. The forum would allow the community to be kept informed regarding progress and transport-related information. During the peak of construction, there would be an additional six HGV (one-way) movements per day on Fountain Road. Moreover, the percentage increase in total traffic on Fountain Road and New Road is below 10%. It is considered that this would not result in a perceivable issue to existing users or in a material change to existing users or pedestrians.

	Mitigation measures (such as the CTMP) are proposed to reduce construction traffic impacts, however even without these measures, road users are only expected to have minor adverse effects as a result of the Proposed Development, and the increase in HGVs (without mitigation) is not likely to result in an increased risk to road safety or driver delays. The increase in traffic during the operational phase would be negligible and no significant effects are anticipated.
Concern that local road infrastructure is inadequate to accommodate this project.	An Abnormal Load Route Assessment considered various route options, and preferred routes, for Abnormal Indivisible Loads (AILs) to the Site, is provided in the Abnormal Load Route Delivery Assessment (ES Volume III, Appendix 4.2). The Proposed Development will utilise two AIL routes to the Site, as illustrated at ES Volume IV, Figure 12.2: Abnormal Loads Routes. The Applicant will obtain any necessary highway upgrades consents under the Highways Act 1990 and, if necessary, planning permission via a separate planning application to the relevant Local Planning Authority. A summary of the proposed physical mitigation works to highways is set out in the High Level Abnormal Load Delivery Route Assessment (ES Volume III, Appendix 4.2). Traffic movements on local roads will be managed effectively to minimise the impact to local traffic journeys. A CTMP would be in place during the construction period. An Outline CTMP has been prepared as part of the planning application and is provided in the Outline CTMP (ES Volume III, Technical Appendix 12). An Abnormal Load Transport Management Plan

	(ATMP) would be prepared in advance of any AIL deliveries to cater for all AIL movements to and from the Site. The Applicant would enter into a Highway Wear and Tear Agreement or a suitable alternative for the local adopted roads/routes to be used by construction vehicles. The Applicant would carry out regular monitoring of the carriageway condition during the construction of the Proposed Development. Necessary repair works would be carried out in a timely manner to prevent further deterioration of the carriageway during the works. Priority would be given to any damage which would be dangerous to users of the road affected.
Criticism of traffic impact study timing	Traffic surveys were specially commissioned and conducted between 29 January and 4 February 2025 in the study area to capture existing traffic volume and speed of traffic at these locations. The locations of the commissioned automatic traffic counters (ATCs) and manual turning counts (MTCs) used in this assessment are illustrated in ES Volume IV, Figure 12.3: Traffic Count Points. The latter were carried out during the peak commuter periods only, for the purpose of understanding turning flows at key junctions / decision points on routes where temporary closures may be required during cabling works associated with the Proposed Development (assumed to be during the peak period of construction as a worst-case scenario) and the prediction of any diverted traffic that would result. Additional speed surveys were undertaken between 24 – 30 June 2024 within the Site Boundary (including along Ffordd-y-Gyfraith). The survey timing has been in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines (July 2023) which states that '<i>surveys should typically be</i>

	<i>carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods.'</i>
Environmental	
Potential flood risk	A Flood Consequence Assessment and Surface Water Drainage Statement (ES Volume III, Appendix 6.2) has been undertaken for the hydrogeological environment within and surrounding the Proposed Development. The Site is wholly located within an area of low-risk flooding (Flood Zone 1). There are smaller areas of Flood Zones 2 (medium risk) and 3 (high risk) associated with surface water and small watercourses. These higher risk areas are associated with watercourse corridors and do not encroach into the agricultural fields comprising the Site. The infrastructure has been sited a suitable buffer distance from watercourses in order to reduce the risk associated with the corridors of the watercourses on site. The layout maintains a 15-metre buffer where possible from watercourses/flood zones, and Site infrastructure has been designed to minimise the number and extent of new watercourse crossings.
Water run off concern	Sustainable Drainage System (SuDS) are included to provide drainage for large areas of hardstanding, including the substation. This ensures the water quality of surface water discharged to either watercourses via controlled outfalls or into the ground via infiltration would be of an acceptable quality. The controlled outfalls will be restricted to the greenfield runoff rates and as such there will be no increase in surface water quantity to the existing watercourses.

	Flood risk and surface water management: measures are set out in the Flood Consequence Assessment and Surface Water Drainage Statement (ES Volume III, Appendix 6.2) will be conditioned by the LPA and implemented by the contractor, Pollution prevention measures will be implemented to reduce the potential for adverse effects to occur during construction. A summary of the pollution prevention measures is provided in the Outline CEMP (ES Volume III, Appendix 2.1). No significant effects are anticipated. Woodland and hedgerow planting, creation of wet grassland and management of dry grassland will be beneficial in regard to the management of surface water runoff across the Site. Additionally, the root network of hedgerows will aid in the interception and absorption of surface water, whilst also stabilising the soils beneath. They also act as a barrier in silt capture, reducing the amount of sediment that can enter nearby watercourses
Soil erosion	A Soil Management Plan (ES Volume III, Appendix 5.4) has been produced to mitigate impacts of construction on soils. This sets out measures including principles of best practice to maintain the physical properties of the soil such as identifying areas of the Site where soils might be more susceptible to physical damage to the soil structure or chemical status, defining when soils can be handled or driven over and use of designated routes for vehicles. Methods to ensure that soil profiles are reinstated in the same order as they were excavated are also set out. The Outline CEMP (ES Volume III, Appendix 2.1) also incorporates measures to manage and mitigate against adverse effects relating to erosion of soils. The Outline CEMP would be

	developed into a detailed CEMP by the Principal Contractor. The detailed CEMP would be secured via a planning condition.
Permanence of concrete turbine bases	Upon decommissioning, the plinth and the top surface of the wind turbine foundations would be broken out to a depth of 1 m from the surface, and all cabling would be cut out at the same depth with the remaining concrete. Once the broken-out concrete has been removed, the area would be reinstated with a final layer backfilled with soil to an agreed method statement, similar to reinstatement after construction. More information on the project description can be found at ES Volume II, Chapter 2.
Biodiversity	
Impact on native bird species e.g. Red Kites, Barn Owls, and Goshawks.	Extensive ornithological surveys have been carried out to assess the potential impact of the Proposed Development on bird populations. Controls will be put in place during construction and will be set out in a detailed CEMP, which will be secured by planning condition; an Outline CEMP is provided as a part of the planning application (ES Volume III, Appendix 2). This will include adherence to buffers around habitats suitable for birds. The Outline Habitat Management Plan (ES Volume III, Appendix 10.4: Net Biodiversity Benefit Report) includes measures and enhancement to benefit ground nesting birds. Woodland planting will provide additional habitat for birds (including red kite and goshawk). Hedgerow planting will provide also provide additional habitat for all species. There will be habitat loss during construction, but this has been assessed as not significant. Disturbance from operation and risk of collision with turbines during operation has also been assessed as not significant.

Request that the Applicant gets in contact with Parc Slip Nature Reserve	The Applicant welcomes the opportunity to discuss opportunities with the Reserve.
Impact on local flora and fungi	Habitat surveys and fungi surveys have been completed, the findings of which have influenced the design of the Proposed Development. Controls will be put in place during construction and will be set out in a detailed CEMP, which will be secured by planning condition; an Outline CEMP is provided as a part of the planning application (ES Volume III, Appendix 2.1). Areas of importance for fungi that are close to construction areas would be fenced off. Any areas of importance for fungi directly affected would be turf stripped and turfs relocated. Grassland areas within the west of the site would be enhanced to benefit fungi. Woodland and hedgerow planting would mitigate for losses within the site. Creation of woodland and hedgerow planting would have a significant beneficial effect. Invasive non-native species management would also be implemented. With the implementation of the detailed CEMP and biodiversity enhancement, the assessment concluded significant beneficial impacts for woodland, hedgerows and fungi. All other effects on ecology were assessed as not significant.
Impacts on brown hares	Impacts on Brown Hare were scoped out of the ES in agreement with PEDW. However, mitigation measures for the safeguarding of brown hare can be included in a detailed CEMP.
Impact on Reptiles e.g. Adder, Grass Snake, Common Lizard and Slow Worm	An assessment of habitats suitable for reptiles has been undertaken within the proposed construction works area and surrounding 250 m. Where vegetation removal (and the habitat is assessed as suitable to support reptiles) is required a precautionary working method

	statement secured via condition would outline mitigation strategies.
Public Right of Way	
Impact on footpaths e.g. Ogwr Ridgeway	An Outline Access Management Plan (ES Volume III, Appendix 13.1) has been developed to manage PRow within the Site so that users can continue to enjoy these during the construction and operation phases. The aims are to protect the health and safety of all users, retain access to as many paths as possible and to identify areas for improvement and enhancement. A number of measures have been identified to provide opportunities for enhancement to existing PRow across the Site, such as: • New or replacement signposts to allow users to better locate paths; • Gate replacement to make footpaths more accessible; • Potential equestrian enhancements; and • Opportunity to provide an additional permissive route with surfacing offering benefits in the winter months.
Impact on paths for horse riders	It is not proposed to temporarily or permanently divert any existing PRow during the operation phase. The existing routes through the Site would continue to be accessible for recreational users and the Proposed Development. A permissive route is proposed along part of the new on-site access tracks, which should provide a better surface which can be used more easily in inclement weather. The Outline Access Management Plan (ES Volume III, Appendix 13.1) sets out mitigation measures that will be put in place to effectively manage access through construction. This includes specific measures in relation to horse riders in accordance with the recommendations by the British Horse Society.

	Once operational the effect would be beneficial on horse riders.
Heritage	
Impact on historic outlook from Llangynwyd village and church	The Proposed Development would result in changes to the setting of the Church and Conservation Area during operation. However, this will not compromise the ability to appreciate the geographical and topographical context of the church. The effects have been assessed as not significant for the Cultural Heritage topic (ES Volume II, Chapter 5: Cultural Heritage).
Technology	
Criticism of size of solar panels	The exact number and arrangement of solar panels depends on a range of factors including the size of the system, its location and direction in which the panels are installed. The assessment has been based on typical PV module parameters. The area of land covered by solar has reduced following Pre-application Consultation.
Safety plan in the case of a BESS fire	The BESS has been removed from the Proposed Development in response to Pre Application Consultation feedback.
Query regarding BESS locations	The BESS has been removed from the Proposed Development in response to Pre-Application Consultation feedback.
Query regarding decommissioning process	The process for decommissioning would follow the same sequence for construction, but in reverse order. All surface elements would be removed, apart from the access tracks, which would remain in situ for landowner use. The concrete foundations would be removed to a 1m depth, and vegetation would be reinstated overtop. A fund would be secured prior to construction that would be available to ensure decommissioning is able to be carried out when required.
Impact of photovoltaic cells	The planning application ES Volume II (Chapter 5: Land, Soils and Groundwater, Chapter 6:

	Water, Chapter 7: Heritage, Chapter 8 Landscape, Chapter 9: Noise, Chapter 10 Terrestrial Ecology, Chapter 11: Ornithology, Chapter 12: Traffic and Movement, Chapter 13: Population and Chapter 14 Climate) consider the impact of the proposed PV solar areas. No significant impacts are predicted.
Alternative technology	To meet our increasing demand for clean electricity, we need to expand wind, solar, and tidal energy. Wind power, both on land and at sea, forms the backbone of the energy transition, but a balanced mix of renewable energy sources is essential to ensure energy security and keep costs manageable. Government policy, as set out in Future Wales: The National Plan 2040, provides a positive policy framework for renewable energy. Onshore wind is one of the most established renewable technologies and one of the most cost-effective. Galileo is a wind and solar energy developer.
Net Zero and Renewable Energy	
Support for greener energy supply	Noted.
Criticism of Net Zero policy as ineffective	The proposal for Mynydd Ty-talwyn Energy Park is set in response to the climate emergency, which the Welsh Government declared in April 2019. In addition, it will help to transition to renewable energy sources and reduce greenhouse gas emissions. Over the next decade, Wales needs to quadruple its wind power capacity – from both onshore and offshore sources. Any comments regarding Welsh Government Policy should be made to the Cabinet Secretary for Climate Change and Rural Affairs.
Disbelief in global warming	In making any decision, the Minister will consider the scheme and its impacts (both positive and negative) in reaching a conclusion as to approve or refuse the proposal.
Concern that wind turbines have a substantial environmental impact	EIA is a process that identifies the likely significant effects of a development on the surrounding environment. Where significant

	effects are identified, proposals, including design changes and mitigation measures, are put forward so these effects can be avoided, reduced or managed. The findings of this process are reported within an ES, which in this case is submitted to PEDW. An assessment of the environmental effects of the Proposed Development has been completed and the conclusions on the likely significant environmental effects are described within the planning application that forms part of the planning application. This includes both adverse and beneficial effects. The planning application identifies adverse significant effects for the settings of three Scheduled Monuments (these would not be physical effects). The effect on landscape character would be significant for areas closest to the Site and to the east and significant visual effect are concluded for some residential properties, although the effects are not to the extent that they would adversely affect residential amenity. Creation of new woodland, hedgerows and enhancement of grasslands would result in significant beneficial effects for ecology. A Summary of Effects can be found at ES Volume II, Chapter 16. The Proposed Development is predicted to deliver total emissions savings of 1,695,193 tCO₂e over its 50-year operational lifetime, against grid mix electricity generation, and 3,647,115 tCO₂e against fossil fuel mix electricity generation. The overall effect is considered to represent a significant beneficial effect. More information can be found in the Climate Chapter (ES Volume II, Chapter 14) and the Carbon Assessment Tool (ES Volume III, Appendix 14.1).
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Socio-economic	
Impact on house prices	A number of studies in the UK and internationally show no significant effect on the change in price of properties within the vicinity of wind turbine proposals and operational wind turbines.
Impact on tourism, especially in the Llangynwyd area	The majority of the Proposed Development lies within a Local Search Area identified within the Bridgend County Borough Council Local Development Plan as being suitable for wind and solar energy development. Views from settlements, including Llangynwyd, have been an important consideration during the design development of the Energy Park. The planning application considers potential impacts to nearby businesses and tourism receptors as well as recreational users including walkers, cyclists and horse riders as a result of any potential impacts on PRoW, including the Ogwr Ridgeway Walk, a locally promoted walk, which links two other trails in south Wales. More information can be found in the Traffic and Movement Chapter (ES Volume II, Chapter 12) and the Population Chapter (ES Volume II, Chapter 13). An Outline Access Management Plan (ES Volume III, Appendix 13.1) has been developed to manage the PRoW within the Site. By enhancing and managing the PRoW, local residents and tourists are more likely to utilise these links. Potential impacts on tourism facilities within the study area have been assessed as not significant. The most recent research on the economic impact of wind farms on tourism was published by BIGGAR Economics in 2021. The research showed that, from an analysis of 44 wind farm case studies in Scotland, there was no

	correlation between wind farm development and trends in tourism employment. Specific to Wales, the Welsh Government commissioned a study in 2014 into the potential effects of onshore wind farms on the visitor economy of Wales. Case studies of local tourism in Wales found that wind farms did not have any significant impact on tourism, with the few local studies undertaken showing more visitors are positive or indifferent about windfarm developments. The above evidence base (amongst others) concludes that the construction of wind farms does not result in negative impacts on tourism during the operational period. The potential for impacts on tourism is closely linked to the public perception of those visiting an area and the evidence base concludes that over the UK 90 % of the population is supportive of onshore wind.
Consultation	
Request that consultations be held outside of working hours	Three consultation events were held: • Cefn Cribwr Athletic Club, CF32 0BA: 29th April 2025, 4pm – 8pm • Llangynwyd Village Hall, CF34 9SW: 30th April 2025, 11:30am – 2:30pm • Coytrahen Community Centre, CF32 0EB: 30th April 2025, 4:30pm – 8:30pm The events were held at different times of day. The events on 29th and 31st April included time outside of usual working hours.
Criticism of limited reach, particularly in Neath Port Talbot	The Applicant sought advice from Neath Port Talbot County Council regarding potential exhibition venues but did not receive any response. No suitable venues could be identified close to the Application Site. The Statutory Consultation Notices were placed in the South Wales Evening Post and Glamorgan

	Gazette on 24th April. In addition, adverts for the events appeared in the South Wales Evening Post and Glamorgan Gazette, newsletters were posted to addresses in Neath Port Talbot that fell within the CPZ, posters were distributed around the Site and surrounding settlements, and local representatives were asked to share the consultation information.
Criticism of choice of consultation venues	The consultation event locations were selected to cover the communities closest to the Proposed Development, communities close to the Site and locations that were easy to access by members of the public.
The Applicant	
Queries regarding the Applicants level of experience delivering similar projects	The Applicant's team leading the project are experienced professionals with decades of experience over more than 30 energy markets. The Applicant has already submitted several similar projects in Scotland, with others nearing submission in Wales.
General mistrust towards developers, due to past experiences e.g. the local opencast mine	A Decommissioning Plan will be agreed with the local planning authorities before the Site is decommissioned. The Energy Park owner has the financial responsibility to decommission the Site and remove all infrastructure. This is usually done by securing a bond to cover decommissioning costs which allows authorities to step in and carry out the work in the unlikely event this is needed. More detail on decommissioning of the Proposed Development can be found in the Development Description Chapter (ES Volume II, Chapter 2)
Community Benefit	
Community facilities e.g. libraries, public ownership of community spaces, youth mental health charities	The Applicant will continue liaison with communities on how the community benefit funds should be distributed, and appreciate all the thoughts and comments from the community, which will be considered in this process.
Criticism that the fund is too small for the scale of development proposed	The Applicant has committed to delivering £5,000 per MW (index linked) of generating capacity for

	the wind element of the project into a community wealth fund. The fund equates to up to £216k a year, and over £10 million over the life of the Proposed Development (in present day terms before accounting for inflation). The Community Wealth Fund is not a planning consideration. A community wealth fund is not a mandatory requirement, but establishment of such funds have become best practice for onshore windfarms to deliver this benefit to support the communities closest to the Proposed Developments. More information on the community benefits can be found in the stand-alone Collaborative Benefits Report.
Queries on fund governance	The Collaborative Benefits Report which is submitted alongside the Planning Application reiterates the Applicant's commitment to the Community Wealth Fund and to making this fund a reality. The Applicant has actively sought community views through community benefit workshops, consultation with community councils and feedback at consultation events. The Applicant is committed to ensuring that the Community Wealth Fund has the largest possible benefit to the communities surrounding the Energy Park. The Welsh Government encourages flexibility in how these benefits are delivered. Decisions regarding how the fund is governed have not been made, and will be decided alongside the preferences of the community.
Community ownership	
Concern that Applicant would decrease the available share to under 10%	The Applicant is committed to offer shared ownership of up to 10 % to local communities.

Investment structure i.e. can local groups invest, what is the investment threshold, how widely accessible is this?	The investment structure is yet to be established, and will be ongoing as the Proposed Development progresses, with input on the communities on how they would like this to be carried out. More information can be found in the Collaborative Benefits Report.
Query as to whether any shares will be given as gifts, with specific mention of Cefn Cribwr residents receiving this	The community ownership scheme does not include 'gifting' of shares. However, the community may be able to benefit from the residential energy discount scheme, the 10 % community ownership or to the £5000 per MW community benefit fund. More information can be found in the Collaborative Benefits Report.

5 STATUTORY RESPONSES

5.1.1 The following table sets out the responses received from all statutory consultees, along with the Applicant's response to the issues. The original responses are collated in **Appendix 21**.

Table 5.1: Statutory Consultee responses as a part of the statutory pre-application consultation.

Consultee	Summary of Consultee Comments	Applicant Response	Result / Change Location
Land, Soil and Groundwater			
Natural Resources Wales	We have reviewed the following documents: • Mynydd Ty-Talwyn Energy Park – Environmental Statement Volume I. Non Technical Summary. RSK Environment Ltd (RSK). Project No: 663870, dated: April 2025 • Mynydd Ty-talwyn Energy Park - Environmental Statement Volume II. Main Written Statement- Chapters 1 to 4. RSK Environment Ltd (RSK). Project Ref: 663870, dated: April 2025. • Mynydd Ty-talwyn Energy Park - Environmental Statement Volume II. Main Written Statement - Chapter 5: Land, Soil and Groundwater. RSK Environment Ltd (RSK). Project Ref: 663870, dated: April 2025. It is imperative for sites like this that the nature of the ground in which the development is proposed to take place is sufficiently investigated, characterised and	The Applicant notes this comment.	NO CHANGE

	risk assessed to ensure sensitive environmental receptors are appropriately protected. In terms of background and site setting we note that the majority of the site has historically comprised of agricultural land, grassland and woodland which we agree is unlikely to have caused significant land contamination. The following references refer to - Chapter 5: Land, Soil and Groundwater dated: April 2025. There are four on-site historical landfills (3No. considered to be inert but one no information supplied Table 5.9), areas of earthworks and quarries and part of a historical Colliery which have been acknowledged as potentially infilled with material of unknown composition during the construction of historical features (Section 5.4.7). We note the presence of a number of surface water features and springs/issues within the study area (Section 5.4.3), indicating shallow groundwater body(s) may be present (whether these re continue or discontinues, either consistently or not throughout the year is unknown with an absence in groundwater monitoring). This background information informs the degree of assessment and investigation that is required in order to make an accurate assessment of risks to controlled waters.		
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NRW	We note in Section 5.4.30 'Groundwater' onwards that the site is underlain by Secondary A aquifer with limited superficial coverage, resulting in a high groundwater vulnerability rating. Section 5.4.31 also states that groundwater depths across the site are unknown. It also states regional groundwater flow is expected to be in line with local topography and towards surface waters, however, flow dynamics more locally have not been monitored or investigated. Our recommendation is that sufficient groundwater investigation be undertaken.	A meeting between NRW and the Applicant occurred on the 27 August 2025. This included a discussion relating to obtaining sufficient data on groundwater prior to construction works commencing. It was agreed that ground investigation would be undertaken prior to construction works, and could be secured by condition. The ground investigation would target areas that are both close to proposed infrastructure, and have the potential for existing contamination to be present. ES Volume II, Chapter 5: Land, Soil and Groundwater, Section 5.7 Additional Mitigation Measures has been updated to include further detail on the proposed ground investigation requirements (including groundwater depth and flow monitoring).	CHANGE
NRW	Table 5.10 'Sensitive Receptors' Land (potential contamination) discusses the potential for the introduction of contamination during the proposed development, and the interaction with known or unknown contamination from historical usage of the	For the purpose of this ES chapter, the sensitivity of the receptor has been determined based on Institute of Environmental Management & Assessment (IEMA) Guide: A New	CHANGE

	site, such as the four historical landfills and historical infilling with unknown material of quarries, earthwork excavations and the colliery workings. The quality of the land in these locations has not yet been quantified or characterisation through site investigation and therefore it is not possible to accurately assign a level of sensitivity or importance (we note the table has classified this as low). We would recommend a site investigation that focuses on particular infrastructure elements, notably turbine excavations, to assess groundwater and geo-environmental conditions.	Perspective on Land and Soil in Environmental Impact Assessment criteria. These criteria do not factor in the existing contamination of the land when determining the sensitivity of the receptor. However, ES Volume III, Appendix 5.1: Preliminary Risk Assessment and the assessment of the effects reported in this Chapter, does consider the potential for known or unknown contamination to be present within the Site, and the likely effects of mobilising any such contaminated material. A meeting between NRW and the Applicant occurred on 27 August 2025, including discussion relating to obtaining sufficient ground investigation data prior to construction works commencing. A ground investigation will be undertaken prior to construction works, and will be secured by condition. The ground investigation is expected to verify the baseline conditions of the Site, including the presence of any contamination. As recorded in ES, Volume III, Appendix 5.5 Natural Resources Wales Meeting	
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		Notes (August 2025) this approach has been agreed with NRW. ES Volume II, Chapter 5: Land, Soil and Groundwater has been updated to clarify this position	
Natural Resources Wales	Table 5.10 'groundwater section', we welcome that groundwater includes recognition of a groundwater assessment covering both quality and quantity as highlighted during the consultation.	The Applicant notes this comment.	NO CHANGE
NRW	We note a discussion of 'future baseline' in Sections 5.4.40 - 5.4.42, we welcome this consideration, however without sufficient baseline characterisation at the Site (outlined in our previous response but for reference including but not limited to groundwater depths and fluctuations seasonally, groundwater flow dynamics including flow direction throughout the year, groundwater & surface water / groundwater & ecosystem interactions, quality of the land etc), the impacts of such considerations cannot be accurately determined. Considering the lifecycle of the project (circa 50 years with potential for extension), this assessment into the near and medium future should be looked into for future baseline.	The assessment considers the potential for changes to the groundwater baseline conditions to occur due to climate change. As noted in NRW's response, this is discussed in 'Future Baseline in the Absence of the Proposed Development' and it is also considered further in the assessment (as set out in paragraph 5.8.3 of ES Volume II, Chapter 5: Land, Soil and Groundwater). As agreed with NRW, the Applicant will collect data relating to the existing groundwater regime as part of the ground investigation (to be secured by condition).	NO CHANGE

NRW	Section 5.6.4 'Groundwater (Quality and Quantity)' - consideration of dewatering requirements during construction, and the quantity and quality impacts of this (impacts on groundwater dependent ecosystems and impacts of potential groundwater contaminant distribution) has not been included. We recommend this is included with the planning application.	The Applicant has included consideration of the effects of dewatering during construction on groundwater quality and quantity, within Section 5.6 and 5.8 of ES Volume II, Chapter 5: Land, Soil and Groundwater. Further information has also been added in to Section 5.7 of ES Volume II, Chapter 5: Land, Soil and Groundwater with respect to mitigation relating to dewatering. Revised text in Section 5.6.8 and Section 5.7.4 of ES Volume II, Chapter 5: Land, Soil and Groundwater.	CHANGE
NRW	<i>Battery Energy Storage Systems</i> The proposed scheme involves the storage of large battery systems containing lithium ion electrolytes and hydrocarbons which have the potential to cause pollution in the event of fire at the site as a result of battery failure. We note in section 5.7.6 that a Battery Safety Management Plan (BSMP) will be produced and secured via condition, to ensure all safety concerns around the BESS element of the proposed development are addressed. We note it is intended	The BESS has been removed from the Proposed Development and consequently is no longer assessed in this ES.	NO CHANGE

	that water will not be used to extinguish fire but will be used to cool areas adjacent to prevent fire spread. We also note that a clean agent (aerosol) is intended to be used to extinguish the fire and therefore, its noted the water would not contain any chemicals. However, further details have not been provided and therefore we cannot comment on potential environmental impacts. We are not the expert body to advise as to whether measures proposed by the applicant to minimise the risk of fire, or to suppress a fire at the site are adequate. We recommend that the applicant seek advice from a Battery Energy and Electrical process safety expert and the relevant Fire and Rescue Service in determining whether the proposed measures to minimise the risk of fire, and to suppress a fire at the site are adequate. You may also wish to consult the below guidance in relation to such matters: Design of containment systems for the prevention of water pollution from industrial incidents You should be satisfied that in the event of a fire all contaminated firewater can be fully contained on site and cannot enter the wider environment. We advise that measures to avoid pollution from contaminated		
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	firewater should be clearly set out by the applicant and provide sufficient detail in support of the planning application. This should include demonstration, to your satisfaction, that: • Thermal runaway detection equipment, automated alert systems, automated fire suppression systems and planned responses to a fire are adequate in detecting and prevent the spread of fire. The relevant Fire and Rescue Service may advise you on these matters. • There is sufficient spacing between units to help to prevent further spread of fires; • Contaminated firewater and foam run-off is prevented from infiltrating the ground or any offsite drainage networks with the use of impermeable surfaces, secondary containment and sealed drainage systems. • The scheme includes sufficient storage capacity to contain contaminated firewater in the event of a fire. The relevant Fire and Rescue Service may advise you on what they consider to be adequate storage capacity. • Notwithstanding the wider TAN15 considerations, where the site is proposed within a flood risk area, the risk of fire from battery exposure to a flood event has been avoided, and the proposed method of		
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	containing contaminated firewater will operate effectively without the risk of pollution. The proposed method of transporting contaminated firewater off-site will be effective, including under the prevailing conditions of a fire at the site. Adequate post event cleanup and environmental remediation has been considered and planned.		
NRW	<i>Decommissioning</i> We note Section 2.5.2 of the Non-Technical Summary states 'A decommissioning strategy would be submitted by the Applicant for agreement with the Local Planning Authority's prior to the decommissioning works taking place, and this is likely to be secured by a suitably worded condition on any planning permission granted. A Decommissioning Environmental Management Plan would be produced for this phase. This would set out mitigation measures to be implemented throughout the decommissioning works and would also be secured via a planning condition'. We welcome this and recommend the assessment includes key tasks for decommissioning and estimated costs that should be signed off by the local authority within which the infrastructure will operate.	A Decommissioning Environmental Management Plan (DEMP) would be produced to discharge a suitably worded planning condition. Section 5.7 of ES Volume II, Chapter 5: Land, Soil and Groundwater outlines the likely tasks that would be managed by the DEMP. The production of the DEMP would be undertaken prior to decommissioning commencing and would be submitted to and approved by BCBC and NPTC.	NO CHANGE

NRW	<i>Decommissioning (continued)</i> As part of the decommissioning strategy, if buried materials will not be decommissioned such as cables, and that assumes that all above ground infrastructure is removed, there must be a Buried Cable Risk Assessment as the cables will be left buried in the environment forever, often in water-rich environments with peatland.	Should the decommissioning strategy for the Proposed Development proposed to not remove the underground cables (as is currently proposed), a Buried Cable Risk Assessment would be undertaken prior to decommissioning commencing. This would be produced to discharge a suitably worded planning condition.	NO CHANGE
NRW	We note Table 5.1 of the Environmental Statement Volume 2 states 'Intrusive geoenvironmental and geotechnical site investigation has not been undertaken at the time of the ES being submitted; however, it is considered that the baseline information obtained to inform this assessment is sufficient to fully assess the likely effect of the Proposed Development for the purpose of EIA'. We continue to recommend that a site investigation be undertaken that focuses on particular infrastructure elements, notably turbine excavations, to assess groundwater and geo-environmental conditions. This is important in order to understand the impact of the development on the hydrogeological dynamics, noting the presence of groundwater springs / issues, surface waters (whether these are groundwater fed is not yet understood) and any groundwater dependent ecosystems).	A meeting between NRW and the Applicant occurred on 27 August 2025, including discussion relating to obtaining sufficient data on groundwater prior to construction works commencing. A ground investigation will be undertaken prior to construction works, and will be secured by condition. The ground investigation will target areas that are both close to proposed infrastructure, and have the potential for existing contamination to be present, and will provide details relating to the existing groundwater regime. Information from the ground investigation will be used in designing geotechnical elements, and ensuring that any requirements for	CHANGE

	These would also help to inform upon geotechnical and temporary dewatering that may be required. Given the proposed height of the turbines, deep and spatially extensive foundations are expected. We do not believe that a sufficient and robust assessment of risk and impacts can be undertaken without appropriate site characterisation based on site specific information.	dewatering can be identified and prepared for in advance. The ES chapter has been revised to include more detailed reference to the requirement for ground investigation, which will ensure that more information is collected in relation to groundwater depth and flow. See Section 5.7 of ES Volume II, Chapter 5: Land, Soil and Groundwater	
NRW	The Peatlands of Wales Map (View map DataMapWales) indicates there is no peat within the site boundary. In addition, there appears to be no evidence for the presence of peatland habitat or other section 7 habitat likely to have been derived from peatland habitat by modification. Given that the higher resolution peat mapping at the location of proposed infrastructure has also not located peat then we have no further observations to make.	Comment acknowledged. No changes made.	NO CHANGE
Natural Resources Wales	<i>Peat</i> We have reviewed Appendix 5.4: Outline Soil Management Plan.	The Applicant notes this comments.	NO CHANGE

	Section 2.3.2. Soil and peat thickness, figure 2-2 indicates a good spread of probing points supported by a fairly strong representation of 66 core locations. We note that peat was encountered at one location and this is unaffected by infrastructure. There is no report of any peat being encountered by coring and not probing. The Peatlands of Wales Map (View map DataMapWales) indicates there is no peat within the site boundary. In addition, there appears to be no evidence for the presence of peatland habitat or other section 7 habitat likely to have been derived from peatland habitat by modification. Given that the higher resolution peat mapping at the location of proposed infrastructure has also not located peat then we have no further observations to make.		
Health and Safety Executive (HSE)	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled	Comment acknowledged. No changes made.	NO CHANGE

	Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.		
The Coal Authority / Mining Remediation Authority	Our records indicate that there are approximately 32 mine entries, within the site, or within 20m of the site boundary. The site is also in an area of mine workings and surface mining activity and within the site boundary our records indicate the presence of mine water sites as well as monitoring and discharge points. The Mining Remediation Authority may need ongoing access to these monitoring points.	The Applicant notes that access for the Coal Authority to their infrastructure should be maintained.	NO CHANGE
The Coal Authority / Mining Remediation Authority	The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with their adopted policy: https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries	The Applicant is aware of the locations of recorded shafts, adits and surface workings, and has avoided these locations with the Proposed Development infrastructure.	NO CHANGE

The Coal Authority	The submission is supported, at Appendix 5.2 of the ES, by a Coal Mining Risk Assessment, dated April 2025 and prepared by RSK. The report authors have identified the recorded coal mining features on the site and assessed the potential risks they pose. We note that this report is stamped draft and our comments on this document are made on the basis that there are no changes to this document when a final version is submitted.	The Applicant notes this comment.	NO CHANGE
The Coal Authority / Mining Remediation Authority	Having reviewed the available coal mining and geological information the authors of the report conclude that there is a potential risk posed to the development by past coal mining activity and recommend that intrusive site investigations are carried out to locate mine entries and investigate the presence of shallow coal workings. Where mine entries are present on site, we would recommend that building close to, or over these features, and their zones of influence is avoided. Where structures, such as wind turbines, and other infrastructure is proposed in areas of coal mining we would encourage the ability to micro site once the findings of investigations are known to avoid any conflict. This would ensure that operational infrastructure is not put at risk from land instability. We	A ground investigation will be undertaken prior to construction works, to provide geotechnical and geo-environmental information. Where possible project infrastructure has avoided known locations of mine shafts, adits and surface workings, but if there are any remaining locations where the features are in proximity, the ground investigation will provide details to ensure that instability issues from coal mining legacy infrastructure is not a concern for the Proposed Development. The Applicant has added the infrastructure details (including turbine locations) to Figure 11 within ES Volume	CHANGE

	are pleased to see that RSK have provided a Coal Mining Constraints Plan, at Figure 11, although we note that not all supporting infrastructure appears to be included on this plan. However, it does not appear from this that the wind turbines themselves are in locations where mine entries are present.	III, Appendix 5.2: Coal Mining Risk Assessment.	
The Coal Authority	We would recommend that a final version of the CMRA is submitted to support any formal submission as the project progresses. We do however concur with the conclusions reached by the report authors, that where coal mining legacy features pose a risk to surface stability they should be investigated and remediated as necessary to ensure the safety and stability of the project infrastructure and its operational capability.	Comment noted.	NO CHANGE
The Coal Authority / Mining Remediation Authority	Wherever coal resources or coal mine features exist at shallow depth or at the surface, there is the potential for mine gases to exist. These risks should always be considered. The Planning & Development team at the Coal Authority, in its role of statutory consultee in the planning process, only comment on gas issues if our data indicates that gas emissions have been recorded on the site. However, the absence of such a comment should not be interpreted to imply that there are no gas risks present. Whether or not specific emissions have been noted by the Coal Authority, you should	The Applicant has identified the potential for risks arising from mine gases, and consideration of this will be made during ground investigation work and subsequent risk assessment, as appropriate. The scope for such monitoring work will be agreed in advance with the appropriate consultees (the local planning authority and/or the Coal Authority).	NO CHANGE

	seek your own technical advice on the gas hazards that may exist, and appropriate measures to be implemented, from technically competent personnel.		
The Coal Authority / Mining Remediation Authority	It should be noted that Permission is required from the Mining Remediation Authority Permit and Licensing Team before undertaking any activity, such as ground investigation and ground works, which may disturb coal property. Please note that any comments that the Coal Authority may have made in a Planning context are without prejudice to the outcomes of any Permit application. Application forms for a permit and further guidance can be obtained from: www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property	The Applicant is aware of the requirement to apply for a permit prior to undertaking any investigation works relating to coal mining infrastructure, and will ensure that this is arranged prior to such works commencing.	NO CHANGE
The Coal Authority	If any future development has the potential to encounter coal seams which require excavating, for example excavation of building foundations, service trenches, development platforms, earthworks, non-coal mineral operations, an Incidental Coal Agreement will be required. Further information regarding Incidental Coal Agreements can be found here: https://www.gov.uk/government/publications/incidental-coal-agreement/guidance-notesfor-applicants-for-incidental-coal-agreements	Information is noted relating to Incidental Coal Agreements, and if there is the potential for any such work to be undertaken, the Applicant will make the appropriate arrangements.	NO CHANGE
The Coal Authority /	Following on from the comments of the Coal Authority, sent by email on the 5th June 2025, I have now had	The Applicant has integrated information provided in this comment into the ES	CHANGE

Mining Remediation Authority	additional information provided by technical colleagues in respect of the monitoring points referred to in our original response. My colleagues have noted that we have no data on mine water level in the vicinity of the site, but that we are aware of a mine water discharge within the planning area (Discharge 608). To try and assist the elevation of the mine water discharge is ~ 115 m AOD and the elevation of the site ranges from ~105 m AOD to ~241 m AOD. They comment that the mine water gradient in the area is unknown and mine water/ groundwater may be shallow beneath the site, there is therefore a potential risk of encountering mine water and/or groundwater during the proposed works. This water may be artesian. Measures should be put in place to manage water should it be encountered and all excavations must be properly sealed so as not to create a new flow pathway into or from any mine workings. It should be noted that continued flow from the mine water discharge on the site of the proposed development (Discharge 608) is understood to control mine water levels in the vicinity and must not be blocked or altered by the planned development.	chapter (see ES Volume II, Chapter 5: Land, Soils and Groundwater, paragraph 5.4.2 and 5.4.23) and ES Volume III, Appendix 5.2: Coal Mining Risk Assessment, Sections 3.6.6, 4.4 and 5.5.	
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	Please note that any information or advice provided in the response of the Mining Remediation Authority should not be considered to constitute a risk assessment with respect to underground water.		
Water			
Neath Port Talbot Council	In accordance with TAN 15: Development, Flooding and Coastal Erosion (2025), unless the application has secured SAB Approval, it would need to be supported by a Drainage Statement produced in accordance with the guidance as set out within section 7 of TAN 15.	Update to Section 8 of ES Volume III, Appendix 6.2: Flood Consequence Assessment and Surface Water Drainage Statement has been updated. This now includes context and further details on surface water drainage as required by TAN 15.	CHANGE
Natural Resources Wales	Flood risk Our Flood Risk Map confirms the site includes a small area of Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers. Given the limited extent of flood risk/location of flood risk shown to be affecting the application site (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.	ES Volume III, Appendix 6.2: Flood Consequence Assessment and Surface Water Drainage Statement includes the Flood Consequence Assessment which sets out clearly the areas of flood risk the developer should be aware of within the Site. The Proposed Development has been proven to be acceptable in regard to flood risk and safe for its lifetime.	NO CHANGE

Natural Resources Wales	Flood Risk – Flood Risk Activity Permit Nant y Gadlys is to the north of the site and considered a main river, therefore, any work in or around the river should consider the need for a Flood Risk Activity Permit (FRAP).	The Proposed Development is set a minimum of 0.9 km from Nant y Gadlys and therefore a FRAP is not considered to be required.	NO CHANGE
Natural Resources Wales	We have concerns that the Cwm Risca SSSI could be indirectly impacted by the proposed access road to the east and north of the site altering the hydrological connections to the SSSI and thus altering the current hydrology, which could adversely impact the protected features. In addition, the position of the solar panel arrays ('J-N') <i>[now panel arrays H to O]</i> in fields directly to the north of the SSSI may have an impact on how rainwater is directed and focussed uphill of the SSSI, which may have some impacts on the hydrology supporting the SSSI. The presence of solar panel arrays can disrupt the rainfall patterns across the field, capturing more on the panels that drip into distinct zones and because of their alignment, could affect infiltration and how rainfall passively drains from the fields. This has a potential to impact the hydrology supporting Cwm Risca SSSI and	ES Volume III, Appendix 6.2: Flood Consequence Assessment and Surface Water Drainage Statement details a gravel back-filled drainage trench on the downslope edge of the access track to manage surface water runoff up to and including the 1 in 100 year plus climate change event as a result of the hardstanding material contributed by the track. The trench captures the runoff close to source and permits natural infiltration and evaporation, whilst the gravel will help capture any potential pollutants resulting from the use of the access track. The trenches will be suitably designed at the detailed design stage to be sized to accommodate the flows from the design event, with a management plan to be provided at the detailed design stage to	NO CHANGE

	we request further assurance that these aspects are assessed and adjusted for in the design of this development where these concerns are substantiated. The proposals for the use of swales within the solar panel array fields are welcomed but need to be carefully designed and monitored to ensure their effectiveness in preventing damage to the SSSI and its protected features.	ensure that the efficiency of the gravel is maintained and any pollutants are removed. The access track should not 'cut off' the hydrological connection from the SSSI catchments upstream of the access track, as overland flows are able to pass freely southward across the road. Any flows in excess of the design event will spill over the trench and runoff towards the SSSI, as per the existing scenario. The specifications of the solar array supports are to be designed to be widely spaced and are driven vertically into the ground with no additional foundations. The arrays are in rows with spaces of several metres in between the leading edge of one row and the trailing edge of the row behind, allowing a 'rainwater gap'. As such, the orientation of the panels will not have a significant impact on the rainfall runoff regime of the site as rainwater will be able to move freely beneath the panels, as per the existing scenario. In line with the research paper by Cook and McCuen (2013) titled	
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		<i>Hydrologic Response of Solar Farms</i>, the research concluded that there was a negligible increase in the volume of runoff from the panels in comparison to the agricultural baseline. Following the Proposed Development, management of the grazing meadow grassland will be implemented with the full details of the improvements included in ES Volume III, Appendix 10.4: Net Benefit for Biodiversity Report. The grassland will mean erosion from runoff beneath the panels is unlikely to occur, and any potential channelisation of flows is slowed. At detailed design, a suitable management regime will be designed to ensure the efficiency of the grassland in helping prevent channelisation. The swales are placed on the downslope perimeter of the solar panel arrays to capture any overland exceedance flows which would not naturally infiltrate to ground. The swales do not have a formal outfall and instead capture the exceedance runoff, allowing any flows in excess of the swale volumes to overspill	
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		at a slower rate to ensure runoff rate is not exacerbated as a result of the development. This should therefore not impact the SSSI, as the regime would be as existing and any channelisation of flows beneath the panels would be suitably managed by the land use	
Cultural Heritage			
Bridgend County Borough Council	My overarching concerns are the physical and visual impact on the historic sites of Llangynwyd, Coytrahen and Tondu in respect of transport movement, vibration, visual glare from large areas of solar panels, physical and visual impact on green landscape to be used for storage containers in considerable numbers. Extract below from Cadw's map and key. The list refers to the historic structures just in Llangynwyd. The blue dots indicate all listings [map and key not copied here] The following map shows the extent of the Registered Historic Landscape: [map not copied here] Also, the setting of Pentre Farm will be impacted on. [map not copied here]	The assessment reported in this chapter, and supporting appendices considers the impacts from increased vehicle trip generation, noise, vibration and changes in views from relevant heritage receptors, including those within Llangynwyd. The effects of the Proposed Development on the local road network are assessed and reported in ES Volume II, Chapter 12: Traffic and Movement. The potential setting effects on heritage receptors as a result of the increased trips are assessed as part of this chapter. The area of the Site which falls within BCBC's jurisdiction is located within LSA1: Llangynwyd Rolling Uplands and Forestry which is identified as being	CHANGE

	I have concerns over the scale of vehicles travelling on roads that were shown to us, that in part, are single track roads. Whilst I appreciate the need for each country to generate its own energy, the use of green field sites that form part of historic landscapes, should not be the first choice of implementing schemes, that currently will be switched off due to lack of generated energy, being stored. Similarly, 40 odd shipping containers to act as battery storage on green field sites is both visually and physically harmful. There must be less sensitive sites that can be used? From a heritage and historic landscape perspective, this is very difficult to support for any approval.	suitable for wind and solar energy development. Further detail on the Site selection process can be found in ES Volume II, Chapter 3: Environmental Context and Reasonable Alternatives Considered. The BESS has been removed from the design and is no longer included as part of the Proposed Development. This change, and other changes in the design of the Proposed Development were discussed with BCBC's Heritage Officer via virtual meetings (as set out in ES Volume II, Chapter 7: Cultural Heritage, Table 7.2). These changes to the design were welcomed by BCBC.	
CADW	We consider that the pre-application is inadequately documented, and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales. Full details of the additional information that is required are explained in the below assessment.	The Applicant notes this comment. See responses to more detailed comments below.	NO CHANGE
CADW	The application will be accompanied by an environmental statement prepared by RSK, with chapter 7 Heritage being produced by Pegasus. This	An archaeological trial trench evaluation has been undertaken for the Proposed Development. The results are presented	CHANGE

	work has considered the impact of the proposed development on the designated historic assets listed in Annex B and their settings. This work has concluded that, with the current level of information, there will not be significant effects on these designated historic assets and their settings: However, the geophysical surveys carried out in the application area has identified a number of archaeological sites, some of which could be contemporary and connected to the designated assets, but no investigations have been carried out to identify the date and function of these sites. The assessment of the impact of the proposed development on the settings of the designated historic assets is therefore incomplete until archaeological evaluation of the identified archaeological sites has been carried out and the results considered. As noted above the archaeological sites identified by the geophysical surveys have not been the subject of archaeological evaluation, thus their extent, nature and date have not been established and therefore their significance is unknown, contrary to the advice given in section 6.1.26 of Planning Policy Wales, which states: - Where archaeological remains are known to exist or there is a potential for them to survive, an application	in this chapter and ES Volume III, Appendix 7.7: Archaeological Field Evaluation Report.	
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	should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. This information is particularly required as it is possible that some of these archaeological sites may be determined to be of National Importance and therefore development on them, or in their settings, could have adverse impact or an unacceptably damaging effect that would be contrary to section 6.1.24 of Planning Policy Wales, which states: - Where nationally important archaeological remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting. Whilst it is noted that section 7.7 of the environmental statement suggests that the archaeological evaluation could be carried out post-determination of the application, this is clearly contrary to section 6.1.26 of		
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	Planning Policy Wales. It is therefore necessary for the archaeological evaluation work to be carried out prior to the completion of the environmental statement and the submission of the planning application. The evaluation should be targeted to provide the required information on the sites identified by the heritage desk-based assessment and the geophysical surveys.		
Heneb/Neath Port Talbot Council	We have consulted the regional Historic Environment Record (HER) and note the submission of an Environmental Statement which includes a Cultural Heritage section (Chapter 7), a Heritage Desk Based Assessment (Appendix 7.2), a Geophysical Survey for the Solar Panels and Substation (Appendix 7.4) and a Geophysical Survey for the Wind Turbines (Appendix 7.6). The archaeological work to date has identified potential Bronze Age burial mounds, a medieval road, several enclosures, as well as linear, discrete and magnetic enhancement anomalies. As a result, there is the potential of encountering archaeological features and structures during the course of the proposed development. However, the exact nature and significance of the identified features is not currently known.	The Applicant notes this comment. An archaeological trial trench evaluation has since been undertaken for the Proposed Development. The results are presented in this chapter and ES Volume III, Appendix 7.7: Archaeological Field Evaluation Report.	CHANGE

Heneb/Neath Port Talbot Council	It is proposed to undertake ‘intrusive archaeological investigations’ composed of trial trenches, potentially followed by further investigations and mitigation, as appropriate. As noted in the submitted documentation, we concur with such an approach. However, also as noted, our recommendation would be for such work to be carried out pre-determination as set out in Planning Policy Wales and TAN 24. Specifically, Planning Policy Wales 2024 (Edition 12) Section 6.1.26 states that “Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains” More detail on this guidance can be found in TAN24 sections 4.7 and 4.8. It remains our assertion that a field evaluation is appropriate in this particular case and should be conducted pre-determination. It is therefore still our opinion that the applicant should be requested to commission the required archaeological work. Consequently, as the impact of the development on the archaeological resource will be a material consideration in the determination of any planning	An archaeological trial trench evaluation has been undertaken for the Proposed Development. The results are presented in this chapter and ES Volume III, Appendix 7.7: Archaeological Field Evaluation Report.	CHANGE
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	application this should be deferred until a report on the evaluation has been submitted. It should also be noted that additional archaeological mitigation could be required, following the completion of the evaluation works.		
Heneb/Neath Port Talbot Council	The scope and methodology for the evaluation will need to be detailed in a written scheme of investigation (WSI), compiled by the archaeological contractor and submitted to us for approval. It is our policy to recommend that all archaeological work is carried out either by a Registered Organisation (RO) with the Chartered Institute for Archaeologists (CIfA), or by a full Member (MCIfA) of CIfA.	A WSI for the archaeological evaluation was prepared by Archaeology Wales and approved by GGAT on 2 September 2025. All works were subsequently undertaken in accordance with that WSI and to the standards and guidance set by the CIfA; Standard for archaeological field evaluation (2023), and Universal guidance for archaeological field evaluation (2023). Archaeology Wales is a RO with the CIfA. The results are presented in this chapter and ES Volume III, Appendix 7.7: Archaeological Field Evaluation: Report.	CHANGE
Landscape and Visual			
BCBC (through	<i>Evaluation of the proposals</i>	The Applicant notes this comment.	NO CHANGE

Anne Priscott Associates Ltd)	The first point to record is that this is a major development in terms of scale and complexity, and in this regard offers many challenges from each of the three main components and the connecting infrastructure.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Wind Turbines</i> The challenges include that the proposed 200m height of the turbines is large in scale and could impact significantly on both landscape and visual receptors. Early in my commission I discussed impacts with the applicants and through a joint site visit to all of the nearest properties in spring 2025 I ascertained that no dwellings likely to experience impacts on residential amenity that would fail to pass the Lavender Test. This gives an element of comfort. However, understanding the nature of likely cumulative impacts with other schemes on long-distance walking routes and cherished places, such as Margam Park is key. Initially I had concerns that the scale of the turbines proposed in terms of height has the potential for turbines on this site to be out of scale with the landform on which they sit.	The Applicant notes this comment.	NO CHANGE

	An important point that I have given due consideration is the positioning of individual turbines whether they would produce an appropriate overall scheme in terms of how they are viewed in the landscape. I consider that whilst generally the proposed development is larger proportionately than the scale of the landscape, my opinion is that the turbines are well-positioned in the landscape and that overall, in landscape terms, the proposals can be accommodated as a stand-alone scheme.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Wind Turbines (continued)</i> The long-distance Ridgeway Walk runs along the ridge through this proposed development and is a highly valued route that affords users long-range views across to the parallel ridges of high land to the north and to the coast and as far as Exmoor to the south. These views are afforded along a number of kilometres providing rare and spectacular experiences. The users of this and other long-distance paths are highly susceptible to changes that would impact on the views afforded and therefore highly sensitive to change. Near-range views would be afforded of the wind turbines for a substantial length of the route along the ridge and the proposed turbines would be in close proximity. The change, whilst significant, would still enable these long-range views	The Applicant notes this comment.	NO CHANGE

	to be appreciated and therefore the visitor experience not changed to such a great degree to being about an unacceptable effect.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays</i> The solar arrays bring greater challenges. The proposed arrays are spatially spread out into the surrounding landscape, in close proximity to the turbines and in areas that are not physically related to the turbines. As currently proposed, the way the scheme has been designed, to be so spread out in this landscape, creates the perception of the proliferation of development that would bring about unacceptable landscape and visual impacts. The changes in view and visual context will make this a far less attractive place to walk and bring about impacts on the long-distance Ridgeway Walk users and raise further substantial and significant visual impacts. The character of the landscape in these different areas is rural and predominantly pastoral with forestry, but the land itself is heavily dissected and geologically complex and therefore, in terms of siting modular elements at a field-scale, the landscape is too complex to be able to accommodate the proposals successfully. The LPA have significant concerns in this regard and will object on landscape and visual	As set out in ES Volume II, Chapter 8: Landscape and Visual, Table 8.2, subsequent Teams meetings and a Site meeting was held with BCBC to discuss the relevant solar parcels, their impact and any revisions to the layout which would alleviate BCBC's concerns. The solar layout has been revised accordingly, notably, in relation to these BCBC comments, with former parcel E being removed, the removal of the BESS and relocation of the substation to the southern side of the Ogwr Ridgeway Walk. These changes remove the need for mitigation planting along the northern edge of the Ridgeway Walk and therefore longer distance views along this stretch are retained. At a subsequent meeting with BCBC and follow up email (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence), BCBC	CHANGE

	grounds to the solar elements if this scheme is taken forward.	confirmed that the changes were welcomed and impacts were reduced.	
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (continued)</i> As an overarching observation, the woodland planting shown is located to screen the solar and BESS and turbine foundation parts of the development. I consider that this is the wrong approach. If the development is appropriate, arbitrary screening should not be required. What I seek to see is well-planned landscape enhancement and mitigation of discordant elements by re-siting or removal from the scheme, not by screening. There are (broadly) six separate areas of arrays. Taking the arrays field by field I have the following observations:	These comments are noted. As mentioned above, Solar Parcel D and the BESS have now been removed from the scheme and the substation has been relocated. This has enabled the mitigation planting to be reduced and refined. Further detail is provided in relation to each parcel below.	CHANGE
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (A, B & C)</i> This part of the scheme lies in NPT. I have no concerns with the actual siting of the arrays. They relate to the forestry land appear to be well-sited. The configuration of the woodland planting needs further refinement so that post-development the landscape patterns created respond well to the landform and forestry and inherent field patterns. Currently they respond to electricity and scheme infrastructure. Consider selecting species that can be	The woodland planting has been refined slightly in this area. It is proposed that a detailed landscaping scheme would be conditioned as part of any planning permission and the Applicant will agree relevant species and more detailed design with BCBC/NPTC at this stage.	CHANGE

	accommodated under the overhead lines without the need to leave clear gaps that create discordant patterns.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (D)</i> Whilst screened from longer-range views to the south by the adjacent forestry, this array sits on upper north-facing slopes and is close to the Ridgeway Walk. I note that there will be significant changes in view and in the foreground of views of T5. Array D will block the long-range views to the uplands to the north for a walker for a duration /distance of over 600m. The proposed woodland screening would introduce an incongruous element into the landscape in perpetuity that will exacerbate this impact. The walker will become enclosed by woodland to the north and the forestry to the south, thus creating a tunnel experience where an open ridgetop character is highly valued. The impacts would be substantial and adverse and permanent. My advice is to remove this entire area from the scheme. As a fall-back, the applicants could model moving the solar farther to the north so that no elements are visible from the Ridgeway Walk even in winter.	This solar parcel has now been removed from the Proposed Development. The solar array references have been reallocated to account for this removal.	CHANGE

	However, this would have consequences for long-range views from the north looking back towards the south from the north of Maesteg and the Llynfi Valley that are also highly sensitive to change.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (E) (New Solar Parcel D)</i> Again, whilst screened from longer-range views to the south by the adjacent forestry, this array sits on upper south-facing slopes/narrow ridge top and is adjacent to the Ridgeway Walk. There will be significant changes in view and in the foreground of views of T4 and T5. I advise that this element can be accommodated as a stand-alone element, but that the cumulative effects with other elements of this complex scheme mean that this is a small area of solar that adds to the complexity of the resultant impacts on highly sensitive viewers. The woodland planting would introduce an incongruous element into the landscape in perpetuity, not just for the 50-year life of the consent, and needs careful re-designing so as to create appropriate long-term landscape patterns or should be removed from the proposals. When on site on 5th June with the applicant's agents the magnitude of change that this woodland would bring was very evidently seen. The views north from the Ridgeway	This solar parcel has been revised to accommodate the relocation of the substation. In response to the comments received by BCBC in relation to planting in this area, the woodland planting has been removed in some areas, and along the road side has been changed to proposed hedgerow planting, in line with the latest comments received by BCBC (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence). With the changes implemented, views north from the Ridgeway walk will not be restricted by this parcel. With regards to views south, towards the coast, the area of proposed hedgerow planting along the roadside would strengthen the existing tall vegetation and therefore with regards to longer distance views south, these would not be substantially altered.	CHANGE

	Walk of the coast and Exmoor would be blocked impacting significantly upon the walkers' experience.	BCBC confirmed in the latest comments received (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence) that they were now satisfied with the proposed woodland planting.	
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (F) [New Solar Parcel E]</i> As a stand-alone element this is predominantly screened from most views by the adjacent riparian woodland and longer-range view interruption by forestry to the north-east, this array sits on north-facing slopes and this is counter-intuitive. There are a number of public rights of way in this area that are difficult to navigate. There will be limited changes in view and in this regard the scheme can be accommodated here without the perception of significant visual impacts. I consider this would be a better location for the BESS (discussed in more detail in this report). I advise that this element can be accommodated as a stand-alone element, but that this will add to the overarching perception of the proliferation of solar developments in the landscape. The woodland planting would introduce	These comments are noted. The BESS element of the Proposed Development has now been removed.	CHANGE

	a compatible element into the and is likely to create appropriate long-term landscape patterns.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (G, H & I)</i> <i>[New Solar Parcels F, G, J, K and L]</i> I have less concerns with the actual siting of the arrays in this group of field-scale parcels. They appear to be well-sited. The configuration of the woodland planting around G [new solar parcels F and G] needs further refinement so that post-development the landscape patterns created respond well to the landform and inherent field patterns. Currently the woodland shown around G [new solar parcels F and G] appears to be designed to screen the solar arrays rather than provide long-term landscape enhancement. This mitigation needs to be re-designed to only enhance long-term landscape patterns and not to screen views.	In response to these comments from BCBC, the woodland planting to the south of parcels H and I (new solar parcels J and K) have been reduced/refined. Woodland planting to the east of parcel G (new solar parcels F and G) has also been removed, in response to the comments from BCBC. The solar parcels in western area G have been amended to respond to ornithology comments received by NRW, but this has also resulted in a refinement and reduction in woodland along the eastern part of this field, which also addresses the requirements of BCBC.	CHANGE
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (J & K)</i> <i>[New Solar Parcels H and I]</i> The landscape character and resultant patterns created in this part of the scheme is really complex. There are important cultural heritage aspects and the valley form between areas of ridge mean that I consider that J and the western part of K should be	Cultural Heritage aspects have been considered within ES Volume II, Chapter 7: Cultural Heritage. During the Site visit with BCBC (05 June 2025), it was discussed that this area was capable of accommodating the solar	CHANGE

	removed from the scheme. The configuration of the woodland planting needs further refinement so that post-development the landscape patterns created respond well to the landform and inherent field patterns. Currently the woodland shown around K [new solar parcel I] in particular appears to be designed to screen the solar arrays rather than provide long-term landscape enhancement. In the long-term the woodland would obscure the field pattern, creating an adverse landscape impact.	arrays, but that refinement to the woodland areas was needed. In response to these comments, the woodland block to the north of parcels J/K (new solar parcels H/I) has been removed and the area to the east of K (new solar parcel I) has been refined. BCBC confirmed in the latest comments received (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence) that they were now satisfied with the proposed woodland planting, as revised.	
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (L, M & N)</i> [New Solar Parcels M, N and O] No concerns with the actual siting of the arrays. Appear to be well-sited. Again, the same comments apply, the configuration of the woodland planting needs further refinement so that post-development the landscape patterns created respond well to the landform and inherent field patterns. Currently they respond to the scheme not the receiving landscape.	Discussions were held with BCBC regarding these woodland blocks offering ecological enhancement as well as landscape mitigation. These woodland blocks have therefore been retained. BCBC confirmed in the latest comments received (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence) that they were now satisfied with the proposed woodland planting, as revised.	NO CHANGE

BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar Arrays (O)</i> No concerns with the actual siting of the arrays. Appear to be well-sited. Again, the same comments apply, the configuration of the woodland planting needs further refinement so that post-development the landscape patterns created respond well to the landform and inherent field patterns. Currently they respond to electricity and scheme infrastructure. Consider selecting species that can be accommodated under the overhead lines without the need to leave clear gaps that create discordant patterns. Look at the character of the adjoining fields to the west for visual clues as to how to make this work better with the inherent landscape patterns present.	Solar parcel O has now been removed from the Proposed Development due to discussions with landowners.	CHANGE
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Solar overarching conclusion</i> The landscape does not have the capacity for all of the solar elements shown in the pre-application plans. The development as shown currently would lead to the over proliferation of solar in particular, creating discordant images and impacting unacceptably on highly sensitive receptors. The advice from the LPA is to remove the most impactful parts of the scheme,	The comments received by BCBC were further refined following a Site meeting. The Proposed Development layout has been revised to remove solar parcel D completely as well as the BESS, which has enabled the substation to be relocated to the south of the Ridgeway Walk, alleviating concerns regarding the longer distance views to the north.	CHANGE

	namely parcels D, E, F, J and K [new solar parcels D, E and H]. Parcels J & K [new solar parcels H and I] may be perceived as being less impactful in terms of proliferation and impacts on the users of the Ridgeway Walk in particular if D, E and F [new solar parcels D and E] are removed. The screening tree and shrub planting also needs a dramatic re-design so that long-range and other highly valued views are not blocked and disrupted and to design the scheme to work with and enhance the inherent landscape patterns rather than to screen this badly designed development.	Other revisions have been made to the solar parcels and woodland planting as discussed above. BCBC confirmed in the latest comments received (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence) that they welcomed the removal of parcel D, the relocation of the substation and the revised woodland planting.	
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – BESS</i> The battery storage element of the scheme is located on the top of the ridge and gives me the greatest concerns because it has an industrial character that is at odds with the rurality of the site. I consider that this would be better located near to solar arrays at F, [new solar parcel E] to the north, or in one of the more visually isolated locations. My recommendation after my site visit on 5th June 2025 remains that this is moved. In addition, there is insufficient information on the detail of the BESS development including an absence of engineering drawings, for an assessment to be made of the impacts the below ground works will	In response to these comments, the BESS has now been removed from the Proposed Development.	CHANGE

	have on the ground and where the earth removed from the site will be placed / stored / disposed. This is a notable shortcoming and needs to be resolved prior to submission of the final documents. The submission of 1:100 scale cross sections will assist in this regard.		
BCBC (through Anne Priscott Associates Ltd)	<i>Evaluation of the proposals – Access</i> The new tracks will bring about their own impacts. The ones that give me most concern are those located close to the / physically impacting on the Ridgeway Walk. The tracks west of G give the greatest concerns. These should be re-located because they will impact significantly on both landscape and visual receptors.	Further discussions were held with BCBC regarding the proposed access junctions. It was explained that at present Site entrances have been engineered to allow for abnormal loads to access the turbine locations from either direction. These include areas of ‘overrun’, which will be constructed of grass crete (or similar) and therefore would have a softer appearance once constructed. BCBC highlighted a preference of moving the access route through solar parcel G (new solar parcels F and G) further south, away from the Ridgeway Walk. However, it was explained to BCBC that due to ornithology constraints the original position was preferable. During the Site meeting on 05 June 2025, it was highlighted to BCBC that for a large proportion of that route, the Ridgeway	NO CHANGE

		Walk was positioned on lower ground with limited visibility over the ridge to the proposed access track. BCBC confirmed in the latest comments received (ES Volume III, Appendix 8.13: BCBC Landscape and Visual Correspondence) that whilst moving the access track further south was preferable in their view, it would not be a 'stumbling block' for progressing the Proposed Development.	
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review</i> The LVIA has a topic-based structure broadly appropriate to a scheme of this scale and complexity. The following section sets out brief notes, topic-by-topic, highlighting parts that require updating before the PAC submission [it is assumed that DNS submission is being referred to]. As an overarching series of comments: submission. As an overarching series of comments: Appendix 8.8 and 8.9 both contain the residential amenity assessment and the viewpoint assessment that should be at 8.8 is missing. Appendix 8.8 has been sent to me by the applicants but will need re-issuing for other responders to view.	These comments are noted. ES Volume III, Appendix 8.8: Viewpoint Assessment was uploaded to the project website www.mttenergypark.co.uk for the duration of the statutory PAC period.	NO CHANGE

BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review (continued)</i> The baseline descriptions of the landscape and views along linear routes and from point receptors are very clear and well-articulated. This is pleasing to read. However, the way the LVIA is structured makes it difficult to untangle the different effects, and there are some issues with the methodology selected and how this is applied. The assessors have used a five-point scale: very high to very low. Whilst theoretically this is acceptable, the reality is that they have not identified any very high value, susceptibility, sensitivity, magnitudes of change or magnitudes of effect throughout the LVIA. For example, the matrix of significance (Table 8.5 [now Table 8.6]), re-printed for ease of reference below <i>[not copied here]</i>, uses this five-point scale. The resultant LVIA records no very high magnitude of changes. The methodology at Vol II Appendix 8.1 sets out the criteria for a very high magnitude of landscape change being: the total loss or alteration to existing landscape features; introduction of dominant new features into the landscape; a very major change to the key physical and/or perceptual attributes of the landscape. On the basis of the scale used I would expect the	The five-point scale (very high to very low) has been adopted in accordance with GLVIA3 principles and is widely used in LVIA practice for renewable energy projects. The Applicant acknowledges BCBC's observation that the 'very high' category has not been applied within this assessment. Very High Value/Sensitivity: The 'very high' category is reserved for landscapes of international and national importance deemed to be of exceptional quality, such as World Heritage Sites, National Parks and National Landscapes (formerly AONBs). The Site is not located within any such nationally designated landscape. While the Site falls partially within locally designated Special Landscape Areas (SLAs), these are local designations that do not warrant 'very high' value ratings when assessed against the full spectrum of landscape quality from international/national designations down to undesignated landscapes. 'Very high' sensitivity has now been applied to the National	NO CHANGE
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	users of the Ridgeway Walk to be very highly sensitive and the impact to be very high magnitude creating a major / substantial adverse effect. Effectively a four-point scale has been used. The criteria for a very high magnitude of visual change is: a change in view that has a dominating or overbearing influence on the overall view. My opinion is that the authors have set the barre too high, and it would be better to go back to GLVIA3 and reconsider the basis for this assessment approach, and revert to a four-point scale, omitting the very high category. At para 5.49 GLVIA3: Judgements are needed about the size or scale of change in the landscape that is likely to be experienced as a result of each effect. This should be described, and also categorised on a verbal scale that distinguishes the amount of change but is not overly complex For example, the effect of both loss and addition of new features may be judged as major, moderate, minor or none, or other equivalent words. The judgements should, for example, take account of: the extent of existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to	Landscape and National Park designations which lie within the study area. Very High Magnitude of Change: Similarly, 'very high' magnitude is reserved for changes that would fundamentally and completely alter the baseline landscape or view - effectively creating an entirely different character. Professional judgement has been used to determine the magnitude of change within the assessment. While the Proposed Development would introduce notable change, particularly through the wind turbines, it would not result in the total transformation of the landscape. The upland character, existing field patterns, woodland blocks, and overall landscape structure would remain. The Proposed Development would introduce new elements into an existing landscape mosaic rather than replacing that landscape entirely. The Applicant maintains that the 5 point scale approach is consistent with GLVIA3 and ensures that the assessment scale	
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	the character of the landscape – in some cases this may be quantified; - the degree to which aesthetic or perceptual aspects of the landscape are altered either by removal of existing components of the landscape or by addition of new ones – for example, removal of hedges may change a small-scale, intimate landscape into a large-scale, open one, or introduction of new buildings or tall structures may alter open skylines; - whether the effect changes the key characteristics of the landscape, which are critical to its distinctive character. The matrix needs to be re-configured such that a medium magnitude of change / sensitivity with a high magnitude of change / sensitivity leads to a moderate to major effect not a moderate effect etc. The approach taken in the LVIA leads to confusion and the miss-representation of the magnitude and significance of effects. I have set out a few examples below to illustrate these issues.	retains meaningful differentiation across the full spectrum of potential landscape impacts.	
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Landscape Impacts</i> The LVIA records (para 8.9.17-18) the value of the receiving landscape, the CYNONVS473 - Mynydd Baedan visual and sensory layer to be high, high susceptibility and high sensitivity. This is agreed.	The Applicant acknowledges BCBC's concern that the assessment could be clearer in distinguishing effects, and revisions have been made throughout the LVIA.	CHANGE

	The magnitude of change is recorded at para 8.9.20 as medium and resultant effect moderate. However, at paragraph 8.9.26 the author records: Overall, the effects on CYNONVS473 - Mynydd Baedan during the operation phase are judged to be major and significant, with the effects on the southern half of the aspect area, which covers the Site, being direct effects and the effects on the northern parts of the aspect area beyond the Site being indirect effects. The LVIA identified significant construction and operational stage landscape effects on CYNONVS473 - Mynydd Baedan, the receiving landscape, to 5km, (para 8.7.22-24). In the NTS at chapter 16 (pdf page 12) the tables record moderate adverse (significant). I cannot work out, on the basis of my experience of visiting turbine, solar and BESS sites during both construction and operation, why the magnitude of changes would be lower during the construction period than during operation. The construction stages being about considerable disruption to the landscape and to views and are accompanied by audible effects and movement that add to the effects perceived by those in the landscape. I consider that the magnitude should be high or very high on the five-point scale used, and the effect would	In response to specific points: • Construction vs Operation Effects: BCBC questions why construction effects are assessed as lower magnitude than operational effects. The rationale is: • Construction effects are temporary (24 months) and characterised by activity, machinery, and partially completed structures. While these are visually intrusive, they are understood by observers to be temporary. • Operational effects are permanent for the lifetime of the development. The turbines, in particular, would be permanent vertical features in the landscape, with moving blades that draw attention. The permanence of these features, combined with their scale and movement, results in effects that are assessed as greater than the temporary construction phase. However, the Applicant acknowledges that construction effects have the	
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	be major. This distance of 5km seems reasonable. However, the assessment of impacts in chapter 8 is very hard to follow and I am concerned that the effects of the development have been under reported through muddling of data. At this stage in the local planning authorities responding to the draft submission documents I am highlighting a few issues and areas where the reporting needs to be simplified and reconciled. However, these errors are peppered throughout the LVIA.	potential to be highly intrusive and disturbing to landscape character and visual amenity during the construction period. The assessment does identify significant construction effects where appropriate. BCBC questions the assessment of effects on CYNONVS473 - Mynydd Baedan, particularly the progression from 'medium magnitude' to 'major effect'. The assessment recognises: • High sensitivity of this landscape (agreed with BCBC) • High magnitude of change in the southern parts of the aspect area where the development is located (direct effects) • Up to High magnitude in the northern parts (indirect effects) The combination of high sensitivity and medium magnitude leads to a moderate effect which is significant for parts of the aspect area during the construction phase.	
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		The overall judgement for the operational phase has been determined considering the range of impacts experienced (i.e. both direct and high) and is judged as a major and significant effect (ES Volume II, Chapter 8: Landscape and Visual, paragraph 8.9.26). This reflects: • The intensity of effects in the southern (host) portion • The extent of the aspect area affected • The fundamental change to character in parts of the area	
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Visual Impacts</i> The same issues apply to the assessment of visual effects. The LVIA identified significant construction and operational stage effects on residential receptors, users of PRow and road users up to 3 km from the Site boundary. (para 8.7.20-22) This seems close-range considering that the users of the Ridgeway Walk and the residential receptors should be assessed on the basis of high sensitivity. But para 8.7.25 identifies that these will reduce to 1km with mitigation from tree planting. I do not agree with this conclusion and with the premiss that screening should be engaged.	The assessment identifies high sensitivity for users of this route, which reflects: • High value as a promoted long-distance route • High susceptibility of recreational users to change This sensitivity is agreed with BCBC.	NO CHANGE

	For the Ridgeway Walk, high sensitivity is set out (para 8.9.107) agreed. Table 8.12 sets out that: <i>[table not copied here]</i> I consider that the methodology flaws are hampering the clear determination of effects. The magnitude during construction would be higher than during operation because of the additional disruptions to the walker's experience. High + high = major, High + medium should be moderate-major, not moderate. For the section 5-10km distant Table 8.12 records high sensitivity and low magnitude of change being slight. By my methods this should be moderate, and by the Matrix (see extract above) the resultant effect should be moderate-minor. These errors continue into the cumulative assessment.	The assessment concludes that the magnitude of change varies by location along the route: • Within and immediately adjacent to the Site: High magnitude, leading to major significant effects • Within 5km of the Site: Medium-high magnitude, leading to moderate-major significant effects • 5-10km from Site: Medium magnitude, leading to moderate effects; and • Beyond 10km: Low to very low magnitude, leading to minor-moderate to minor effects This graduated approach reflects the reality that effects diminish with distance. The Applicant considers that 'very high' magnitude is not appropriate even for sections within the Site during the operational phase, as: • The route would remain functional and accessible	
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		• The surrounding landscape context would remain (woodland, moorland, rolling topography) • The view would not be dominated or overwhelmed - turbines would be prominent but would not occupy the entire view • Multiple other elements would remain in the view Importantly, the revised layout has significantly reduced effects on the Ogwr Ridgeway Walk through: • Removal of former Solar Parcel D north of the route • Relocation of substation south of the route • Removal of the BESS • Concentration of infrastructure primarily on one side rather than both sides The design has been amended to directly addresses concerns of BCBC about the effects on this important recreational route.	
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BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Cumulative assessment</i> The baseline is again very well described. Minor but important factual point: The Eirlys Solar Farm is not consented. It is still at the pre-planning stage.	The cumulative section has been updated.	CHANGE
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Conclusions</i> As an overarching observation, the LVIA assessment contains a large volume of data that has been collected. The quality of analysis of that data and the format in which it is presented has an influence on how effects are quantified and presented and on how conclusions are drawn. Resolving the issues with the methodology and the transcribing of effects set out above needs to be done as a priority, and then this will start to read as a well-assessed document. The bones are strong, the flesh needs tweaking.	These comments are noted. Changes have been made, as highlighted above.	CHANGE
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Conclusions (continued)</i> The scoping consultation report suggested a study area out to 35km with an inner 20km study area. I feel the application would benefit from a 5-7.5km detailed study area for both the solar and the wind turbines with 5/7.5km bare ground ZTVs (and surface model ZTVs if the consultants wish to add these). By being supported by mapping information at a more detailed	The Applicant has carefully considered BCBC's request for additional 5-7.5km detailed mapping and offers the following response: 1. Bare Ground ZTVs at 5-7.5km: The existing blade tip and hub height ZTVs (ES Volume IV, Figures 8.3 to 8.6) are presented as 'bare ground' or 'bare	NO CHANGE

	scale the reader will get closer in to understanding effects at this key threshold of significance area. Using a 1:25,000 base map will also make the project much more readily understood in terms of the geographic locations of potential impacts.	earth' models that do not account for screening vegetation or buildings. These follow standard SNH/NatureScot guidance for wind energy developments. The ZTVs are presented at both 35 km and 20 km extents, with the 20 km ZTVs providing appropriate detail for the 5-7.5 km zone. 2. Surface Model ZTVs: 'Surface model' ZTVs account for screening by woodland and buildings (as opposed to 'bare earth' models that show topography only). The Applicant notes that: • For wind turbines: Surface model ZTVs have limited value due to the height of the turbines (up to 200 m to tip). Woodland and buildings that screen lower-level views typically do not screen turbines, making surface model ZTVs for turbines similar to bare earth models in most locations. • For solar: A surface model Screened ZTV was (and is) provided at ES Volume IV, Figure 8.30: Screened ZTV Solar and Substation	
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		Elements. This accounts for screening by woodland and buildings using OS VectorMap Local data. The Applicant considers that additional surface model ZTVs for the wind turbines would not add significant value to the assessment. The request to use 1:25,000 base map is also noted, this mapping has been used within the 20 km ZTVs.	
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Conclusions (continued)</i> The need to possibly divert parts of / interrupt usage of the route of the Ridgeway Walk and the impact this will have on the quality of walking experience and the historic relationship between this walking route and the landscape is not fully evaluated. The application is complex covering three main energy generation / storage elements. It might be easier to break down the assessments from Chapter 15 into the solar + BESS and the wind. Then have scenario 0 being the combined effects in the cumulative assessment. Then the overall effects will be more clearly presented, and I would hope a lot of the confusion would be resolved.	The Proposed Development has been designed to accommodate existing PRoW throughout the Site. Therefore there will be no need to permanently divert any PRoW. There may be the need to temporary divert during the construction phase, and this would be kept to a minimum, short term in duration and managed via an Access Management Plan. The Applicant notes this suggestion for restructuring the assessment. The current LVIA follows the standard approach established in GLVIA3 and widely	NO CHANGE

		adopted for mixed renewable energy developments, which is to: • Assess each component's individual contribution to landscape and visual effects • Consider the combined effect of all scheme elements together, and • Assess cumulative effects with other developments separately This approach ensures that: • The effects of each element are clearly identified and understood • The interaction between elements is properly considered, and • The assessment remains proportionate and focused on significant effects. However, the Applicant acknowledges that clarity of presentation is important. Throughout the revised ES Chapter, care has been taken to: • Clearly distinguish between effects arising from turbines (the most prominent elements) and effects arising from ground-level infrastructure	
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		• Use sub-headings and clear signposting to guide readers through the assessment, and • Ensure that the relative contributions of different elements to overall effects are clearly articulated The Inter-Project Cumulative Effects assessment (ES Volume II, Chapter 8: Landscape and Visual, Section 8.12) considers the Proposed Development as a whole in combination with other developments in the area, which the Applicant believes provides appropriate and proportionate consideration of combined effects.	
BCBC (through Anne Priscott Associates Ltd)	<i>LVIA Review – Conclusions (continued)</i> Delete para 8.12.123 – balancing planning arguments should not be in the LVIA.	This paragraph has been deleted with the planning balance arguments to be made in the Planning Design and Access Statement .	CHANGE
BCBC (through Anne Priscott)	<i>Special Landscape Areas</i> T6 and solar arrays in field parcels A, B & C are located within SLA 4 Margam. The assessment of effects in Appendix 8.5 identifies significant effects not	ES Volume II, Chapter 16: Summary of Effects has been updated to reflect any inconsistencies.	CHANGE

Associates Ltd)	carried through to the NTS tables at chapter 16. The effects need to be broken down into magnitude of change, sensitivity of receptor and combined magnitude of effect so that a reader can understand how the conclusions presented have been drawn.	A further breakdown of the sensitivity of the receptor and the magnitude of change / impact has not been included within ES Volume II, Chapter 16, as the focus of that chapter is to summarise the effects of the Proposed Development and identify those which would be significant. A detailed breakdown of the assessments reported in ES Volume II, and how the significance criteria has been applied, is provided within the corresponding technical chapters (ES Volume II, Chapter 5 to 15). However, acknowledging this comment, where required, ES Volume II, Chapter 8: Landscape and Visual and its supporting appendices have been updated with the relevant magnitude of change, sensitivity and resulting effect clearly stated.	
BCBC (through Anne Priscott Associates Ltd)	<i>Margam Historic Park and Garden</i> The effect on the setting of the Margam Historic Park and Garden and associated visitors to the Country Park forms a key consideration of effects on highly sensitive landscape and visual receptors. Views of two	These comments are noted. Margam Park is considered within the Viewpoint assessment at ES Volume III, Appendix 8.8: Viewpoint Assessment with VP's 1 and 2 located within the park.	NO CHANGE

	turbines will be afforded, and they will contribute to cumulative effects experienced through the park through the Y Bryn, Eirlys and other developments. The greatest combined impacts will be from the upper parkland, near the Bro stone, and for users of the long-distance paths crossing this well used plateau.	The effects on the two National Trails The Cistercian Way and the Ogwr Ridgeway Walk passing through the Park are considered within Section 8.10 of ES Volume II, Chapter 8: Landscape and Visual .	
Neath Port Talbot Council	Notwithstanding the above comments in relation to turbine 6 <i>[see 'Design' section of this table below]</i> and potential topple distances, the Authority raises no objection at this time to the Landscape Visual Impacts associated with both this and the other 5 turbines proposed as part of the Proposed Development.	The Applicant notes this comment.	NO CHANGE
Neath Port Talbot Council	In relation to the proposed Solar Array and BESS aspects of the Proposed Development, the Councils' jointly commissioned Landscape Visual Impact Assessment Consultant has raised a number of concerns within her report to the visual impacts associated with these aspects of the Proposed Development.	This comment is noted, and a response to those concerns is provided against the relevant comments above.	CHANGE
Neath Port Talbot Council	It is noted that Councils' consultant has stated that in relations to the proposed A-C sections of the proposed solar array which are the sections of the proposed solar development proposed to be located within the NPTC jurisdiction that <i>"I have no concerns with the actual siting of the arrays. They relate to the forestry</i>	A response to these comments is provided with the BCBC response above.	NO CHANGE

	<i>land appear to be well-sited. The configuration of the woodland planting needs further refinement so that post-development the landscape patterns created respond well to the landform and forestry and inherent field patterns. Currently they respond to electricity and scheme infrastructure. Consider selecting species that can be accommodated under the overhead lines without the need to leave clear gaps that create discordant patterns.”</i>		
Neath Port Talbot Council	In response to the other aspects of the proposed solar and BESS development, the Council’s Landscape and Visual Impact Assessment Consultant has stated that they would advise against areas D, E, J and K [now parcels D, H and I]; in relation to the impacts associated with these areas. However, she has also identified the need to refine the proposed woodland planting, in relation to the areas F, G, H, I, L, M and N [now parcels E, F, G, J, K, L, M, N, and O] so that the post development responds to the landform and inherent field pattern rather than the proposed development itself. Nevertheless, it is noted that much of the potential impacts identified would have limited impact upon the Jurisdiction of NPTC.	A response to these comments is provided with the BCBC response above.	CHANGE
Neath Port Talbot Council	It is noted that the Figure 8.34 – Other Non-Wind Cumulative Development within 10Km and Figure 8.35 – Other Non-Wind Cumulative Development within	This error is noted and the cumulative assessment has been updated reflecting	CHANGE

	5Km appear to suggest that the Eirlys Solar Farm development is already consent, which is incorrect. It is also noted that reference is also made on these documents to Dyfed Reinforcement Riverside Road scheme, however this is not a project that the planning department recognises as having been consented.	that Eirlys Solar Farm is only at scoping stage. Dyfed Reinforcement Riverside Road Scheme was granted a lawful development certificate in 2022 and therefore has been retained.	
Natural Resources Wales	Our advice relates to the landscape character and visual amenity of the Bannau Brycheiniog National Park (BBNP) and the Gower National Landscape (NL)¹, and the statutory purpose of these designations to conserve and enhance their natural beauty. We have reviewed the Mynydd Ty-talwyn Energy Park - Environmental Statement (ES), April 2025 prepared by RSK. In particular: • ES Volume 2: Chapter 8: Landscape and Visual (LVIA) • ES Volume 3 Appendices 8.1-8.12 • ES Volume 4: Figures • The proposed development includes 6 wind turbines with a maximum blade tip height of 200m, solar photovoltaic (PV) modules (55 MW), and a Battery Energy Storage System (BESS). Due to the distance between the site and the BBNP and Gower NL, it is unlikely the BESS or solar PV development would impact on the purpose of either designation. Our	These comments are noted.	NO CHANGE

	comments therefore focus on the impact of the proposed wind turbines. The proposed turbines are located outside of a Pre-Assessed Area (PAA) for Wind Energy in Future Wales: The National Plan 2040 (FW). To accord with FW Policy 18, the proposals should not have an unacceptable adverse impact on the surrounding landscape, particularly on the setting of the BBNP and Gower NL. Since our advice at scoping, the number of proposed turbines has reduced from 10 to 6, and the maximum height of the turbines has reduced from 230m to 200m.		
Natural Resources Wales	At its closest point, the BBNP is located just over 20km northeast of the Site. Effects on the National Park and its Special Qualities are assessed within ES Volume III, Appendix 8.6; the findings are summarised in ES Paragraph 8.9.223. We note the LVIA reports no greater than minor adverse effects on receptors within the BBNP (Not Significant), including in relation to visual amenity receptors, landscape character, and Special Qualities of the National Park.	These comments are noted.	NO CHANGE

	With reference to the Zone of Theoretical Visibility (ZTV) analysis (Figures 8.3 and 8.5), we note: • Within the National Park and within 30km of the turbines, visibility of all six turbines at blade tip height is unlikely. • Blade tip visibility of up to 4 turbines is likely at a limited number of locations around the 30km distance. • No visibility of any turbines at hub height is expected within the National Park at distances within 30km of the turbines. VP 15 (Ogof-Ffynnon-Ddu) is the only LVIA viewpoint located within the BBNP and it is within 30km of the proposed turbines in an area where the ZTV indicates no visibility – consequently, the supporting visualisation shows no visibility of the turbines (ES Appendix 8.10). Within the National Park, the largest area of potential intervisibility lies beyond the 30km radius within the Black Mountain / Mynydd Du. This includes both blade tip and hub height visibility. The LVIA does not include any viewpoints within this area but we accept that impacts resulting from the proposed development at this distance are unlikely to be considered significant. Overall, based on the submitted information, we are		
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	satisfied that impacts on National Park receptors are unlikely to be significant.		
Natural Resources Wales	<i>Gower National Landscape</i> At its closest point, the Gower NL is located c.21 km from the site. Effects on the Gower NL are considered within ES Volume III, Appendix 8.6; the findings are summarised in ES Paragraph 8.9.224. We note the LVIA reports no greater than minor adverse effects on receptors within the Gower NL (Not Significant), including in relation to visual amenity receptors, landscape character, and Special Qualities of the NL. With reference to the ZTV analysis (Figures 8.3 and 8.5), we note: • Visibility of all six turbines at blade tip height is projected across different parts of the NL at distances within c.23km to 35km (extent of LVIA study area) from the site. • Within the NL, the extent of visibility of the six turbines at hub height is significantly reduced compared with blade tip visibility.	These comments are noted	NO CHANGE

	VP 14 (Mumbles Hill) is the only LVIA viewpoint located within the Gower NL and it is within 25km of the proposed turbines. The supporting visualisations show visibility of five turbines at hub height and blade tip visibility of one turbine (T5) (ES Appendix 8.10). Currently, views from Mumbles Hill across Swansea Bay are characterised by a relatively balanced mixture of natural and built features. Swansea Bay has outstanding integrity as an intertidal landscape and its scenic qualities are complemented by the range of enclosing hills. Although these same views feature substantial urban areas and notable detractors such as the Port Talbot steelworks, the scale of the Bay and the dark backcloth of hills behind has, to a degree, enabled these elements to be absorbed without dominating the natural scenic qualities of the Bay. These qualities provide a positive setting to the National Landscape and contribute to the visual amenity experienced by its visitors. From Mumbles Hill, industry at Port Talbot is visible in the same field of view as the proposed turbines. However buildings at Port Talbot are backclothed by hills which reduces their visual prominence, with the hills being the dominant feature. The turbines would be visible on the ridgeline above the industrial area, and may attract attention on account of their scale, ridgeline location, and the rotation of turbine blades.		
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	Whilst the turbines would add to the presence of detractors in views from Mumbles Hill such as ‘the turbines on Mynydd Brombil’, the impact individually or cumulatively is unlikely to be significant due to the existing nature of views from Mumbles Hill, the distance of separation between the turbines and the viewpoint, and the partial screening of the turbines by intervening landform. As this is expected to be the most impacted viewpoint within the NL, we are satisfied with the LVIA conclusion that impacts on receptors within the Gower NL are unlikely to be significant. We are satisfied with the information provided in the ES and do not require any further information at application.		
Noise			
Bridgend County Borough Council (through 24 Acoustics)	A review has been completed of the draft Environmental Statement documents dated April 2025 made available by the applicant directly or via the project website (https://mttenergypark.co.uk/) and comprising the following: • ES-Vol-II-Chapter 9 Noise • Raw Baseline Noise and Wind Speed Data (provided directly by RSK) • ES-Vol-III-Appendix-9.3-Baseline Noise Survey • ES-Vol-III-Appendix-9.4-Construction Plant Lists and Assumptions	The Applicant notes this comment.	NO CHANGE

	ES-Vol-III-Appendix-9.5-Proposed and Cumulative Wind Turbine Details It is noted that the documents are draft only and comments are provided based on preliminary review.		
Bridgend County Borough Council (through 24 Acoustics)	<i>Summary</i> The approach to cumulative noise assessment for operational noise effects due to wind turbines needs to be reviewed to align with the Institute of Acoustics Good Practice Guide where practicable.	The Applicant notes this comment. A review has been undertaken and the approach is in line with ETSU / IOA GPG.	NO CHANGE
Bridgend County Borough Council (through 24 Acoustics)	The construction noise assessment should be reviewed to ensure any mitigation measures are proportionate, will be effective and can be secured through inclusion within the CEMP or by condition.	The construction assessment has been reviewed, along with any proposed mitigation requirement. The mitigation measures proposed will be secured through inclusion within the CEMP or by condition.	NO CHANGE
Bridgend County Borough Council (through 24 Acoustics)	The background noise measurement data has been reviewed. Further analysis and clarification is required to demonstrate data is representative for assessment purposes and that processing data follows best practice;	Updates to the processing of the background noise data has been undertaken in response to the PAC comments. This includes, addition of time history charts, dawn chorus removal, data exclusion identification, polynomial line updates for minima and maxima, time stamp synchronisation confirmation and wind direction filtering review for MP2 and	NO CHANGE

		MP7. All undertaken in accordance with ETSU or the IOA GPG. Any changes are identified in response to each specific query below.	
Bridgend County Borough Council (through 24 Acoustics)	Detailed review has not been undertaken for the operational noise assessment results. Further clarification and analysis is required including propagation calculations, cumulative assessment approach and background noise data prior to detailed review of assessment results.	The applicant acknowledges this comment. Responses relating to propagation calculations, cumulative assessment approach and background noise data has been provided below.	NO CHANGE
BCBC	Given that the proposals include new BESS and wind turbine noise sources consideration needs to be given to the cumulative impacts of these elements together on existing noise sensitive receptors;	BESS now removed as part of latest design. The assessment reported in ES Volume II, Chapter 9: Noise and Vibration and the associated appendices in ES Volume III have been updated to reflect the removal of BESS from the Proposed Development.	CHANGE
BCBC	Chapter 9 Noise – Table 9.9 Calculations of noise from wind turbines should not include the effect of screening from terrain using ground contours which may overestimate the level of screening provided. The Institute of Acoustics (IOA) Good Practice Guidance (GPG) advises no more than 2 dB attenuation due to screening from terrain should	Screening has been applied in accordance with the IOA GPG. Abar is limited to 2 dB in line with the IOA GPG and no turbine propagation path for the Proposed Development is indicated to have benefited from screening.	NO CHANGE

	be applied. Please confirm if modelling includes screening effects due to terrain.	Abar of up to 2 dB is included for many propagation paths from turbines considered as part of the inter-project cumulative effects assessment due to the turbines relative position with reference to the Noise Sensitive Receptor (NSR) and intervening topographic conditions.	
BCBC	Chapter 9 Noise – 9.3.44 Please confirm which propagation paths have concave ground profile corrections have been applied.	Concave ground profile corrections are applied in accordance with the IOA GPG.	NO CHANGE
BCBC	Chapter 9 Noise – 9.3.52 Please confirm which propagation paths have screening corrections been applied.	Screening has been applied in accordance with the IOA GPG.	NO CHANGE
BCBC	Chapter 9 Noise – 9.3.60 As per IOA GPG guidance cumulative assessment should be undertaken initially accounting for the consented noise limits for relevant existing turbine sites. Predicted noise levels based on manufacturers data can be used to inform the likely degree of headroom available. Please review and clarify if existing noise limits are applicable and notable headroom within limits exists	Consented noise limits for the other wind farm projects considered within this assessment were not available at the time of undertaking the assessment. A cumulative wind turbine scheme candidate turbine +2 dB has been added to the sound power levels and used to calculate existing turbines noise levels with reference to manufacturers data; this	NO CHANGE

	such that using predicted noise levels based on manufacturers data is appropriate.	follows the recommendations of the IOA GPG.	
BCBC	Chapter 9 Noise – 9.3.66 This section indicates only daytime works are proposed. Please confirm if works are proposed during other time periods (i.e. evening, night-time or weekend periods). If works are proposed during these other time periods, please state threshold values and include appropriate assessment of potential impacts. If not please include a statement to confirm no works are proposed other than daytime. Management of potential impacts due to over-runs or exceptional works/activities (e.g. night-time road closures, out-of-hours deliveries) could be addressed within a Construction Environmental Management Plan.	As set out in Section 2.6 of ES Volume II, Chapter 2: Proposed Development Description, standard core hours are proposed: Daytime (07.00–19.00) and Saturdays (07.00–13.00). Sundays and Public Holidays: No work permitted without prior approval. Exceptional events, such as the delivery of abnormal indivisible loads (AILs), may be delivered outside these hours when the road network is at its quietest to reduce traffic disturbance. These would be managed in accordance with a Construction Traffic Management Plan, and outline of which is provided in ES Volume III, Appendix 12.1: Outline Construction Traffic Management Plan. Additionally, turbine foundation concrete pours must take place continuously and so activity would only cease when the pour has been completed.	NO CHANGE

		Management of these exceptional events would be achieved through the Construction Environmental Management Plan (CEMP).	
BCBC	Chapter 9 Noise – Table 9.17 The duration of vibration due to construction activity is a factor that should be considered within significance criteria. Continuous vibration with a level of 0.9 mm/s Peak Particle Velocity (PPV) is likely to be more significant than a single event with a level of 1.0 mm/s.	Table 9.16 of ES Volume II, Chapter 9: Noise and Vibration has been updated to include reference to duration. In accordance with Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration, effects are deemed potentially significant if moderate to major vibration levels (i.e., PPV at or above 1.0 mm/s) are experienced for more than 10 days in any 15-day period, or for more than 40 days in any 6-month period.	CHANGE
BCBC	Chapter 9 Noise – Table 9.17 What is the change magnitude classification for construction noise which does not exceed duration criteria.	The magnitude of change remains as per Table 9.16 of ES Volume II, Chapter 9: Noise and Vibration. The wording has been updated for clarity. As per Section 3.19 of DMRB LA 111, construction noise and construction traffic noise shall constitute a significant effect where it is determined that a major or moderate magnitude of impact will occur	CHANGE

		for the durations identified in Table 9.16 of ES Volume II, Chapter 9: Noise and Vibration.	
BCBC	Chapter 9 Noise – Section 9.6 This section is titled 'Assessment of Likely Effects (Without Additional Mitigation)' but does not assess impacts or significance. Clarification is required if assessment has been undertaken with or without additional mitigation in this and following sections.	In order to determine whether any additional mitigation is required, an assessment has firstly been undertaken with embedded mitigation only. Where that assessment has identified that there is potential for likely significant effects to occur in the absence of additional mitigation measures, additional mitigation measures have been proposed in Section 9.7 of ES Volume II, Chapter 9: Noise and Vibration. The subsequent assessment of the residual effects following the implementation of this additional mitigation is presented in Section 9.8 of ES Volume II, Chapter 9: Noise and Vibration. Where no additional mitigation is required, to ensure consistency with other factor specific assessment chapters within this ES, the assessment findings have been reported in Section 9.8 of ES Volume II, Chapter 9: Noise and Vibration.	NO CHANGE

		The draft ES Volume II Chapter 9: Noise and Vibration submitted as part of the PAC process did not identify the need for any additional mitigation and therefore the assessment outcomes were reported in Section 9.8 of ES Volume II, Chapter 9: Noise and Vibration for consistency with other factor specific assessment chapters within this ES.	
BCBC	Chapter 9 Noise – 9.7.4 Please see comments relating to Appendix 9.4 and plant source noise levels. Please review the need for additional mitigation measures including temporary noise barriers during construction. The assessment makes no reference to the duration of construction activities which is a factor in the determination of significance and the need for additional mitigation. Where necessary additional mitigation should be included within the Construction Environmental Management Plan.	Duration is considered within the determination of significance as per Table 9.16 of ES Volume II, Chapter 9: Noise and Vibration. Specific details relating to both the duration and exact location of a specific activity are not available at this stage, as no principal contractor has been appointed. Additional mitigation measures are required to mitigate noise emissions predicted, as outlined in Section 9.7 of ES Volume II, Chapter 9: Noise and Vibration. Such measures are also detailed in and secured by ES Volume III,	NO CHANGE

		Appendix 2.1: Outline Construction Environmental Management Plan. As per Section 9.7 of ES Volume II, Chapter 9: Noise and Vibration, temporary noise barriers will be used when the construction works associated with the access track are taking place within approximately 120m of noise sensitive receptors, as detailed in and secured by ES Volume III, Appendix 2.1: Outline Construction Environmental Management Plan.	
BCBC	Chapter 9 Noise – 9.8.15 to 9.8.22 No consideration is given to the cumulative noise impact from proposed BESS and wind turbines. It is noted these are assessed under different methodologies however this is not considered within the context discussion section. Where BESS alone approaches a level which may result in adverse impacts, depending on the context, the combination with noise from new wind turbines may result in higher overall impacts. This is an indication mitigation should be considered to minimise impacts from the BESS to ensure the cumulative effect	The BESS has been removed as part of latest design; solar and substation are considered below in response to this comment. The substation/solar is predicted to be between 9-32 dB below the contribution of the wind turbines, which would therefore result in a negligible increase to the noise level from the Proposed Development. This has been reviewed across all Standardised 10 m Wind Speeds (m/s) (3 m/s to 12 m/s).	CHANGE

	of different aspects of the scheme are reduced where possible. This should also be considered within the cumulative effects sections.	This indicates that the solar and substation noise emissions provide a negligible contribution to the noise environment when considered alongside the proposed wind turbines.	
BCBC	Chapter 9 Noise – 9.11.5 to 9.11.18 Please see comments regarding propagation calculations, cumulative assessment approach and background noise data. Further clarification and analysis is required prior to detailed review of assessment results.	The Applicant notes this comment. Please see response to comments regarding propagation calculations, inter-project cumulative assessment approach and background noise data.	NO CHANGE
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data The charts showing background noise measurement results and polynomial lines do not clearly show measurement results. It is difficult to see the datapoints in these charts which merge into each other. Please update these charts to show more clearly the measurement results, exclusions and trendlines. Given the large spread in results at some locations it is recommended time history charts are also provided	Background noise measurement results and polynomial lines have been updated in ES Volume III, Appendix 9.3: Baseline Noise Survey. Time history charts including any data exclusions have now been provided in ES Volume III, Appendix 9.3: Baseline Noise Survey. Both are provided based on the IOA GPG SGN2.	CHANGE

	to clarify data exclusions and show the effect wind speed has on each location. See IOA GPG SGN2.		
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data Background noise data has not been filtered to exclude periods affected by dawn chorus. Review of data clearly shows data is affected by dawn chorus. Please filter data to exclude the dawn chorus and in accordance with IOA GPG.	Time history charts including any data exclusions have been provided in ES Volume III, Appendix 9.3: Baseline Noise Survey in accordance with the IOA GPG. The impact of dawn chorus has been investigated and (as suggested within the IOA SGN2 guidance) the removal of dawn chorus and its effect on the night-time noise limits is very small due to the ETSU-R-97 night-time fixed minimum limit of 43 dB (rather than the background noise level plus 5 dB).	CHANGE
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data	The Applicant notes this comment.	NO CHANGE

	Additional filtering has been applied to exclude unrepresentative or extraneous periods. This appears to include excluding data less than 20 dB $L_{A90,T}$ for several monitoring locations. It is not clear however how this has been completed or which periods have been excluded. This has the potential to affect the polynomial fit for background noise data. Please clarify how background data has been filtered and which periods are excluded. Exclusions should be marked on time history charts.	No additional filtering has been applied for data below 20 dB $L_{A90,T}$.	
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data Given the exposed and rural nature of the majority of measurement locations it is expected background noise levels would be controlled by wind especially at higher wind speeds. Background measurement results at several locations however appear to have a weak correlation with wind speed. Please check and confirm datasets are time synchronised and relevant exclusions have been made which may affect correlation with wind speed.	The Applicant notes this comment. Datasets are confirmed as being matched to Coordinated Universal Time (UTC)+00:00.	NO CHANGE

BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data Several measurement locations appear to have a split in the data (e.g. MP2 Night, MP5 Night, MP6 Night, MP7 Night) which may be due to wind direction. Wind direction data has not been provided for review. Given that wind direction is considered within the operational noise assessment it is important that comparison of prediction results is made against background noise levels and derived limits representative for these conditions. There is potential that background noise levels are lower under certain wind direction conditions where resulting impacts are higher owing to wind direction. Please provide wind direction data for review and confirm if wind direction affects background noise level and assessment results.	Wind direction data have been reviewed in line with IOA GPG SPG2 and it is confirmed that: MP7 Night-time: Removing degrees 45 – 135, i.e., E – ESE (direction of A4063 road) has no impact on the derived noise limits. MP2 Night-time: Removing degrees 30 – 120, i.e., E – ESE (direction of A4063 road) has no impact on the derived noise limits. At MP5 and MP6, there is no indication from observations on-site or desktop review that suggest further analysis would be required to assess influence of atypical noise sources.	NO CHANGE
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data It is noted location MP4 is near to existing wind turbines.	MP6 monitoring location (without the influence of the existing turbines) has been used to provide a representative background noise level for the MP4 position, as agreed between the Applicant and BCBC via e-mail correspondence 16 August 2024.	NO CHANGE

	Please confirm if any corrections have been made to background measurement data to account for operational noise from existing wind turbines at MP4 or any other measurement locations.		
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data Given the exposed and rural nature of the majority of measurement locations it is expected background noise levels would be controlled by wind especially at higher wind speeds. Background measurement results at several locations however appear to have a weak correlation with wind speed (e.g. flat polynomial line or large spread in data). There is a large spread in measured background noise levels for several of the monitoring locations (e.g. MP5 indicates background noise levels are between 25 and 50 dB $L_{A90,T}$ during the daytime). It is noted that polynomial best fit lines derived from data where a large spread in data occurs may result in higher limits and potential adverse impacts during operation of the proposed turbines (i.e. background noise levels may regularly be lower than assumed within derived limits). Whilst it is acknowledged using polynomial best fit lines is recommended within ETSU	Datasets are confirmed as being matched to Coordinated Universal Time (UTC)+00:00. The derived prevailing background noise polynomial lines have been updated so they do not extend beyond the range covered by adequate data points. The highest derived background noise level has been adopted as a constant value for all wind speeds above the point where this maximum occurs. Similarly, the lowest derived background noise level has been adopted as a constant value for all wind speeds below the point where this minimum occurs as per IOA GPG 3.1.20-3.1.21. The data are considered as representative of the assessment locations.	CHANGE

	and the IOA GPG the underlying assumption is that background data is representative for assessment locations. Please check and confirm datasets are time synchronised and relevant exclusions have been made which may affect correlation with wind speed, and that data is representative for assessment purposes.	Updates have been made to ES Volume III, Appendix 9.3. Baseline Noise Survey, ES Volume II, Chapter 9: Noise and Vibration, Section 9.6, Operational Noise (Wind Farm Assessment) Assessment and Section 9.11 Inter-Project Cumulative Effects in Table 9.37 and Table 9.38	
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data The polynomial lines for several monitoring locations reduce at higher wind speeds resulting in lower derived limits for the highest wind speeds compared to lower speeds. These should be limited to the maxima for highest wind speeds and similarly the minima for lower wind speeds if using third order polynomials. See IOA GPG 3.1.20-3.1.21. Please update derived background noise levels and ETSU limits accounting for these limitations in the data.	The derived prevailing background noise polynomial curves have been updated so they do not extend beyond the range covered by adequate data points. The highest derived background noise level has been adopted as a constant value for all wind speeds above the point where this maximum occurs. Similarly, the lowest derived background noise level has been adopted as a constant value for all wind speeds below the point where this minimum occurs as per IOA GPG 3.1.20-3.1.21. Updates have been made to ES Volume III, Appendix 9.3. Baseline Noise Survey, ES Volume II, Chapter 9: Noise and Vibration, Section 9.6,	CHANGE

		Operational Noise (Wind Farm Assessment) Assessment and Section 9.11 Inter-Project Cumulative Effects in Table 9.37 and Table 9.38	
BCBC	Appendix 9.3: Baseline Noise Survey, & Raw Baseline Data Based on the above comments regarding background data, further analysis and clarification is required to demonstrate measured background noise levels are representative for assessment purposes.	The background data have been reviewed in line with the comments provided and the guidance provided in ETSU and the IOA GPG. In consideration of the dawn chorus, background sound levels have been adjusted for minima and maxima, time and date synchronisation between lidar and noise data and directivity. The updated data is provided within ES Volume III, Appendix 9.3: Baseline Noise Survey. All updates have resulted in limited change to the background noise level and derived noise limits. Based on the updates, the background noise data are considered representative for assessment purposes.	CHANGE
BCBC	Appendix 9.4: Construction Plant Lists and Project Assumptions – Table 1-6	Tables 1 to 6 of ES Volume III, Appendix 9.4: Construction Phase	CHANGE

	Several plant items have very high source noise levels such as Dump Truck and Grader. Values selected from BS5228 refer to maximum drive-by noise levels instead of L_{eq} values. These levels should be reviewed to ensure construction noise is appropriately assessed.	Plant Lists and Project Assumptions have been reviewed and updated. LAFmax emission levels from BS5228 have been corrected for one time within the calculation of total activity noise level.	
BCBC	Appendix 9.4: Construction Plant Lists and Project Assumptions – Tables 1-6 The final column states 'Cumulative noise level'. The assessment does not consider noise impact from simultaneous or cumulative construction activities. This column should be renamed 'Total activity noise level' or similar.	The heading of the final column in Tables 1 to 6 in ES Volume III, Appendix 9.4: Construction Phase Plant Lists and Project Assumptions have been renamed from 'Cumulative noise level' to 'Total activity noise level'.	CHANGE
BCBC	Appendix 9.5 - Proposed and Cumulative Wind Turbine Details Please see previous comment relating to approach for cumulative assessment which should be undertaken initially accounting for the consented noise limits for relevant existing turbine sites.	Where available, consented noise limits at shared receptors have been used. Where not available candidate turbine +2 dB has been used to calculate existing turbines.	NO CHANGE
Terrestrial Ecology			
Natural Resources Wales	We have previously provided a Scoping Response (our reference: CAS-244326-T8P9, dated 18 January 2024).	The Applicant notes this comment. Please see responses to more detailed comments below.	NO CHANGE

	We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding European protected species, designated sites, ornithology and land contamination. If this information is not provided, we may object to the planning application when formally consulted by the determining body. On receipt of further information, we would consider planning conditions to be secured on any permission granted. Further details are provided below.		
Natural Resources Wales	<i>Protected Species</i> We welcome the preparation of the following documents in support of an application for the above proposed renewable energy scheme: • Mynydd Ty Talwyn Energy Park Environmental Statement Volumes 2 (Main Text), 3 (Appendices) & 4 (Figures) by RSK dated April 2025. We note that the proposed development comprises six wind turbines (up to 200m to blade tip), a solar farm, Battery Energy Storage Systems (BESS), on-site substation and associated infrastructure. We also note that consent is sought with a 50 metre (m) micro-siting tolerance for the turbines and associated	The Applicant notes this comment.	NO CHANGE

	infrastructure. We note that a number of protected species have been identified on site.		
Natural Resources Wales	<i>Protected Species – European Protected Species: Legislation and policy</i> Bats, dormice, and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017. Where bats or great crested newts are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if: • 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; • There is no satisfactory alternative; and • The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN5) states that your Authority should not grant planning permission without having satisfied itself that the proposed development either would not impact adversely on any bats on the	The Applicant notes this comment.	NO CHANGE

	site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied. <u>Water Vole – Legislation</u> 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 only 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.		
Bats			
Natural Resources Wales	<i>Protected Species – Bats: Bat activity on site</i> We welcome that bat activity surveys of the site have been carried out. The Environmental Statement (ES) confirms that these have comprised: • Static detectors deployed on site during May, July and August 2023; • Transect surveys (3 transects) on-site June, August and October 2024;	ES Volume III, Appendix 10.1: Ecological Baseline Report, Figure 5: Bat Static Locations and GLTA Results has been amended to show Static detector locations in 2023 and 2024 surveys and their position relative to the proposed locations of the development infrastructure. Weather data table provided separately within ES Volume III, Appendix 10.5:	CHANGE

	- Four static detectors deployed in the solar array areas in July and September 2024. With reference to Table 7 of the baseline ecology report, whilst the timing of the static detector surveys appears to accord with the published guidance we seek the following further information to fully consider the adequacy of the surveys: - A map which shows the static detector locations in 2023 and 2024 surveys and their position relative to the proposed locations of the development infrastructure. The information provided should be consistent between ES Chapter 10 and the supporting appendices and figures. - The weather conditions at the time of the static surveys, along with confirmation of the dates for which the weather conditions were deemed unsuitable for bats throughout the night; and - A map clarifying the transect route in June and October 2024.	Additional Bat Data Weather and High Risk Collision Proportionality. ES Volume III, Appendix 10.1: Ecological Baseline Report, Figure 5: Bat Static Locations and GLTA Results has been amended to show the transect route in June and October 2024.	
Natural Resources Wales	<i>Protected Species – Bats: Bat activity on site (continued)</i> Bats are known to be vulnerable to, and collide with, wind turbines but the species are variable in terms of this risk. We welcome that the online Ecobat tool has been used to analyse the bat activity data obtained from the surveys.	The Applicant notes this comment.	NO CHANGE

	Of the information available to date, we note that there is significant proportion of activity by pipistrelle and noctule bats, along with some activity by barbastelle bats across all three seasons.		
NRW	<i>Protected Species – Bats: Turbine siting</i> Published guidance (Bats and onshore wind turbines - survey, assessment and mitigation NatureScot) advises that minimum 50m buffer is maintained between wind turbine blade tips and nearest bat habitat features (E.g. woodland edge, hedgerow, watercourses) where bat activity or other key habitat features such as wetlands). We advise that this requirement applies irrespective of other micro-siting constraints. We note that large turbine models are proposed to be used and that minimum 50m turbine buffers are referenced as embedded mitigation (Table 10.11). However we advise that further information is included with the submitted application to support this statement including: • Confirmation of what the bat buffer is for each turbine (with reference to the calculation in Figure 1 of the above guidance); and, • Illustrate both the bat buffer and the full extent of the micro-siting tolerance for each turbine on a map of new and retained habitats.	A 50 m buffer from blade tip to vegetation (including both existing and proposed vegetation) has been incorporated, as detailed in Table 10.13 of ES Volume II, Chapter 10: Terrestrial Ecology. ES Volume IV, Figure 10.4: Important Ecological Features Protected Species - Bats has been updated to include the relevant bat buffer. A 50 m micro-siting allowance is being applied for; however, this would be restricted in directions which include constraints. It is proposed that a condition to submit and agree a scheme of micro-siting is attached to any permission, which will ensure sensitive areas are excluded; this approach has been used on other wind farm DNS permissions. We propose that the bat buffers are maintained throughout the life of the Proposed Development. Habitat management to ensure this would be secured through the Habitat Management Plan.	CHANGE

	Clarification is sought that appropriate bat buffers relevant to the turbine dimensions and height of nearest bat habitat feature will be employed and will not be compromised by new and retained habitats. Having established the bat buffers at the micro-siting stage, we advise that those buffers are maintained throughout the operational phase; we consider that this aspect could be dealt with via an appropriately worded Habitat Management Plan planning condition attached to any consent issued for the scheme.		
NRW	<i>Protected Species – Bats: Feathering turbine blades</i> We advise that blade feathering is applied to all wind turbine schemes as it can help minimise the potential for killing and injury of bats at lower wind speeds without compromising energy generation. We advise feathering is applied to all turbine blades between April – October to reduce rotation speeds to below 2rpm while idling. We consider that this aspect could be secured through the use of an appropriately worded planning condition attached to any consent issued for the scheme.	This requirement has been incorporated into the design of the Proposed Development as embedded mitigation. Text has been added to Table 10.13 of ES Volume II, Chapter 10: Terrestrial Ecology to capture this requirement.	CHANGE
NRW	<i>Protected Species – Bats: Turbine Curtailment</i> In order to assess whether any additional operational mitigation measures such as curtailment may be required, we advise that the submitted application also includes the following:	Proportion of bat activity data has now been provided separately within ES Volume III, Appendix 10.5: Additional Bat Data Weather and High Risk Collision Proportionality.	CHANGE

	Information on the proportion of bat activity above the cut-in speed of the turbines in each of the seasons by bat species at medium and high risk of collision with wind turbines. We also note that passes of both horseshoe bat species were recorded on site in each of the three seasons. These are low risk from a turbine collision perspective, but are a consideration in terms of habitat connectivity. Whilst we welcome that important habitat features for bats are illustrated on Figure 10.4, and that habitats to be created are shown on Figure 10.6, in order to consider this further we seek a map that brings this together and shows on one map the bat habitat features that horseshoe bats are likely to use which will be lost, retained and created as part of the development.	A new figure has been created, ES Volume IV, Figure 10.7: Impacts and Mitigation Horseshoe Bats, which illustrates the bat habitat features that horseshoe bats are likely to use which will be lost, retained and created as part of the development.	
NRW	<i>Protected Species – Bats: Bat Roosts</i> We note and welcome the reference in ES para 10.8.62 and Table 10.14 to bat monitoring, though we think what is meant here is a ‘Bat Monitoring and Mitigation Strategy’ (BMMS). We advise that the submitted ES outlines the mitigation that will be required from the outset of the operation of the development (based on the assessment of impacts) and the monitoring	Text has been amended at paragraph 10.8.62 of ES Volume II, Chapter 10: Terrestrial Ecology and Table 10.16 Additional Mitigation to refer to a BMMS. An outline Habitat Management Plan with monitoring commitments incorporating the BMMS is included within ES Volume III, Appendix 10.4: Net Benefit for Biodiversity Report.	CHANGE

	commitments, for the Inspector's consideration as part of the determination of the application. With that sufficiently addressed, we would be content to agree the remaining details as part of the BMMS. We welcome that 16 trees with potential to support roosting bats have been subject to ground level assessment of roost features and climbed endoscope inspections. Of these we note that T3 and T72 have potential to support a maternity roost (PRF-M) and T72, T88, T97 and T98 have potential to support non-breeding bat roosts (PRF-I). As above, we advise that the ES sets out the proposed mitigation for the loss of these roosts.	Text has been added to ES Volume II, Chapter 10: Terrestrial Ecology Table 10.13 to capture the embedded mitigation for the loss of these roosts.	
Dormice			
NRW	<i>Protected Species – Dormice</i> We note that the application is progressed assuming presence of dormice, which we would consider to be a reasonable approach given the records of dormice nearby. To help inform an assessment of the significance of impacts of the scheme on dormice, we advise that the following further information is provided: A plan showing dormouse habitat to be lost, retained and created which should identify the extent and location on appropriate scale;	A new figure has been created at ES Volume IV, Figure 10.8: Impacts and Mitigation Dormouse	CHANGE
NRW	<i>Protected Species – Dormice (continued)</i>	These have been added onto ES Volume IV, Figure 10.6: Impacts and Mitigation	CHANGE

	We welcome that a minimum 15m buffer will apply between built development and woodland, and a 10m buffer will apply between built development and existing hedgerows; we advise that these buffers are shown on the scheme layout drawings. We also welcome that hedgerow gaps will be used wherever possible for the placement of access tracks.	as a note. They have not been displayed visually as they would not be clearly legible due to the scale of the figure, but text in a pop out box indicates the buffers.	
GCN			
NRW	<i>Protected Species – Great Crested Newts</i> We note that waterbodies within the site and on land within 250m of the site boundary have been assessed for their potential to support great crested newts (GCN). From the information available to date, it appears that GCN are absent from the application site itself. We note that a number of ponds on land within 250m of the site boundary were not surveyed due to access restrictions. We advise that a map is provided to confirm the location of all the waterbodies identified on site and on land within 250m of the site boundary, and identify those that were subject to survey and those that were not.	ES Volume III, Appendix 10.1: Ecological Baseline Report, Figure 4: GCN eDNA Survey Results Sheet 1 of 2 and Figure 4: GCN eDNA Survey Results Sheet 2 of 2 has been amended to show this information	CHANGE
NRW	<i>Protected Species – Great Crested Newts (continued)</i> We advise clarification is provided regarding the pond numbers referenced in paras 2.14.7 and 2.14.8 of the	Amended text in ES Volume III, Appendix 10.1: Ecological Baseline Report, paragraphs 2.14.7 and 2.14.8, to clarify that it is Pond 11 and Pond 59	CHANGE

	ecology baseline report, and justification for assumptions of GCN presence that have been assigned to other ponds inaccessible for survey as listed in Table 24 of the same report.	being referred to, respectively and relevant justification is provided within the paragraphs.	
Natural Resources Wales	<i>Protected Species – Great Crested Newts (continued)</i> At this time we note that one waterbody to the south of the site (P77) has a positive record for GCN, but that there are no development works or habitat creation works are proposed within 250m of this pond.	The Applicant notes this comment.	NO CHANGE
Otter and Watervole			
NRW	<i>Protected Species – Otters</i> We seek clarification of the areas that were subject to otter (and water vole) surveys in 2023 and 2024, and those areas where survey access was not possible. Whilst we note that no evidence of otters or otter holts or resting places were found during the surveys, we note that the presence of otters dispersing through the landscape cannot be ruled out.	All of the areas of watercourse shown on the otter and water vole plan ES Volume III, Appendix 10.1: Ecological Baseline Report, Figure 6 Otter and Watervole Waterbodies were surveyed – physical access was restricted in some areas but survey by binocular was possible and so there are no areas where survey was not possible.	NO CHANGE
NRW	<i>Protected Species – Otters (continued)</i> We welcome that a 10m buffer will be applied between built development and watercourses; we advise that these are shown on scheme layout drawings.	These have been added onto ES Volume IV, Figure 10.6: Impacts and Mitigation as a note. They have not been displayed visually as they would not be clearly legible due to the scale of the figure.	CHANGE
NRW	<i>Protected Species – Otters (continued)</i>	As set out in Table 10.13 of ES Volume II, Chapter 10: Terrestrial Ecology,	NO CHANGE

	We also welcome that mammal gates will be installed as part of security fencing to allow permeability of the developed site by mammals including otters. We advise that a planning condition is attached to any permission granted for the scheme requiring the submission of the fencing specification, including design and proposed location of mammal gates, for approval prior to works commencing on site.	mammal fencing has been incorporated as an embedded part of the design. The Applicant welcomes a planning condition attached to any permission which requires the specification of the fencing to be submitted and agreed prior to works commencing.	
NRW	<i>Protected Species – Otters (continued)</i> We also note the proposal to use an open span bridges at a watercourse crossings in the north-east of the site. We advise that any consent issued for the scheme includes a suitably worded planning condition to require the detail of the specification of the structure to be agreed prior to development works commencing.	The Applicant welcomes a planning condition attached to any permission which requires the specification of watercourse crossings to be submitted and agreed prior to works commencing.	NO CHANGE
Natural Resources Wales	<i>Protected Species – Water Voles</i> Whilst we note that there are records of water voles within approximately 1km of the site, we observe that no evidence of water voles was found within the site itself. We welcome that watercourses shall be buffered from development works and an open span bridge used for the watercourse crossing. Accordingly we refer to our advice above for otters.	The Applicant notes this comment.	NO CHANGE
SSSI			
NRW	<i>Protected Sites – Cwm Risca, Site of Special Scientific Interest (SSSI)</i>	ES Volume III, Appendix 6.2: Flood Consequence Assessment and Surface Water Drainage Statement details a gravel back-filled drainage	NO CHANGE

	The application site is adjacent to the Cwm Risca, Site of Special Scientific Interest (SSSI) which supports the key habitat features of marshy grassland (predominantly NVC M23, M24 and M25 grassland communities) and the marsh fritillary butterfly (<i>Euphydryas aurinia</i>). These features rely upon the current hydrological regime to maintain the scarce and protected habitat and species that they support. Paragraph 6.4.26 of Planning Policy Wales states that proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are clearly understood; development should be refused where there are adverse impacts on the features for which a site has been designated. We have concerns that the Cwm Risca SSSI could be indirectly impacted by the proposed access road to the east and north of the site altering the hydrological connections to the SSSI and thus altering the current hydrology, which could adversely impact the protected features. In addition, any airborne or pollution runoff during the construction phase of the roads, from fuel and oils in the use of on-site machinery and subsequent use of the access road could also potentially adversely impact the SSSI. In addition, careful consideration within any detailed CEMP and risk assessment and working method statement (RAMS) which will be required to prevent either an interruption or alteration of the hydrological links and minimise any pollution resulting from the creation and	trench on the downslope edge of the access track to manage surface water runoff up to and including the 1 in 100 year plus climate change event as a result of the hardstanding material contributed by the track. The trench captures the runoff close to source and permits natural infiltration and evaporation, whilst the gravel will help capture any potential pollutants resulting from the use of the access track. The trenches will be suitably designed at the detailed design stage to be sized to accommodate the flows from the design event, with a management plan to be provided at the detailed design stage to ensure that the efficiency of the gravel is maintained and any pollutants are removed. The access track would not 'cut off' the hydrological connection from the SSSI catchments upstream of the access road, as overland flows are able to pass freely southward across the road. Any flows in excess of the design event will spill over the trench and runoff towards the SSSI, as per the existing scenario. The specifications of the solar array supports are to be designed to be widely spaced and are driven vertically	
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	use of this access road. This will also be the case for the development of the solar panel array situated directly east of the SSSI where there is a watercourse that enters the SSSI on its eastern boundary. In addition, the position of the solar panel arrays ('J-N') in fields directly to the north of the SSSI may have an impact on how rainwater is directed and focussed uphill of the SSSI, which may have some impacts on the hydrology supporting the SSSI. The presence of solar panel arrays can disrupt the rainfall patterns across the field, capturing more on the panels that drip into distinct zones and because of their alignment, could affect infiltration and how rainfall passively drains from the fields. This has a potential to impact the hydrology supporting Cwm Risca SSSI and we request further assurance that these aspects are assessed and adjusted for in the design of this development where these concerns are substantiated. The proposals for the use of swales within the solar panel array fields are welcomed but need to be carefully designed and monitored to ensure their effectiveness in preventing damage to the SSSI and its protected features.	into the ground with no additional foundations. The arrays are in rows with spaces of several metres in between the leading edge of one row and the trailing edge of the row behind, allowing a 'rainwater gap'. As such, the orientation of the panels will not have a significant impact of the rainfall runoff regime, infiltration and/ or passive draining of the Site as rainwater will be able to move freely beneath the panels, as per the existing scenario. In line with the research paper by Cook and McCuen (2013) titled <i>Hydrologic Response of Solar Farms</i>, the research concluded that there was a negligible increase in the volume of runoff from the panels in comparison to the agricultural baseline. Following the Proposed Development, management of the grazing meadow grassland will be implemented with the full details of the improvements included in ES Volume III, Appendix 10.4: Net Benefit for Biodiversity Report. The grassland will mean erosion from runoff beneath the panels is unlikely to occur, and any potential channelization of flows is slowed. At detailed design, a suitable management regime will be designed to ensure the efficiency of the grassland in helping prevent channelisation.	
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		The swales are placed on the downslope perimeter of the solar panel arrays to capture any overland exceedance flows which would not naturally infiltrate to ground. The swales do not have a formal outfall and instead capture the exceedance runoff, allowing any flows in excess of the swale volumes to overspill at a slower rate to ensure runoff rate is not exacerbated as a result of the development. This should therefore not impact the SSSI, as the regime would be as existing and any channelization of flows beneath the panels would be suitably managed by the land use.	
NRW	<i>Protected Sites – SSSI buffer</i> There appears to be a proposed buffer zone approximately 50m wide, between the solar panel array (labelled ‘O’ on the designs) and the eastern boundary of the SSSI. It would be good to see a wider buffer zone allocated given the scale of this development and to award the protected site greater ecosystem protection to increase its resilience to future changes, such as climate change. It can be argued that the solar panel array to the east of the SSSI may not be deemed to pose a significant, direct impacts on the protected SSSI features. We advise further consideration is given to allocate a wider buffer to the protected sites and to sympathetically manage that buffer to afford a level of habitat protection that	The solar panels to the east of the SSSI have been removed so the distance between the SSSI and proposed built development is now much larger at a minimum separation distance of 110 m. The buffer between the SSSI and the development will be continued to be managed as they currently are, which will provide habitat protection.	CHANGE

	allows for greater, future habitat resilience and allow space for wildlife utilizing the SSSI to have an enhanced habitat resource to boost and assist the overall effectiveness of the ecology of this small, protected site. We have been developing our approach to ecosystem resilience and affording critical areas of land and habitats around protected sites as part of highlighting and planning resilient ecological networks (REN). This approach, as shown within NRW mapping, illustrates a buffer of at least 120m would be more appropriate to support this resilience approach to the protected habitat features. Thus, this buffer allocation should be looked at again by the developer to assess if this impact on the 'resilience buffer,' as attributed to Cwm Risca SSSI within NRW's REN can be amended to support the future resilience of this protected site. As part of the biodiversity gains within these proposals, the buffer could include implementation of appropriate restoration and management techniques to support and maximise the ecological functioning of the SSSI within the buffer land. This could be achieved through appropriate modification towards sympathetic drainage, extensive grazing with appropriate livestock and planting of suitable species, where beneficial and supportive the ecological function of the protected habitats within the SSSI.		
NBB			
NRW	<i>Protected Sites – Marsh Fritillary Butterfly</i>	Text has been amended in Annex 1 of ES Volume III, Appendix 10.4: Net Benefit	CHANGE

	The Marsh Fritillary butterfly (<i>Euphydryas aurinia</i>) is a designated feature of the Cwm Risca SSSI. The butterfly exists as a 'meta population' and relies upon a network of marshy grassland sites both within and outside of the designated sites network. The allocation of mitigation land to be restored as marshy grassland habitat to benefit marsh fritillary butterflies is welcomed. This area is an important landscape for this species and these proposals could assist in their conservation in the future. Some fields within the allocated area appear to support existing marshy grassland, due to the dominant appearance of purple moor grass on aerial photos, and adjacent fields appear to have been agriculturally modified to an extent. However, we have concerns with the management prescriptions within the 'Appendix 10.4: Net Benefit Report (including Habitat Management Plan), Feature 3: Wet Grassland Management'. We do not agree with the statement in section 5.3.12, 'Management of wet grassland will follow similar management styles to the dry meadow creation with short cutting throughout the winter, growth in spring – summer, hay cut in late summer and autumn to spring mowing/grazing'. The restoration of these fields should be undertaken via low intensity cattle grazing regime in general, with some, targeted mowing/topping or potentially use of 'cut and collect' machinery in parts where purple moor grass (<i>Molinia caerulea</i>) is	for Biodiversity Report in relation to Feature 3: Wet Grassland Management (Marsh Fritillary Mitigation Area). They have been amended to follow the prescriptions suggested by NRW.	
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	dominating or where species such as soft rush (<i>Juncus effusus</i>) or similar needs to be managed. Only parts of each field should be cut each year to reduce impacts on existing invertebrate and other species, in any, one-year cycle. Sensitive, gradual changes are best for nature conservation but where grass tussocks are dense, more intensive cattle grazing may be an option to consider as a short-term tool to help break up the sward. Section 5.3.14 suggests the use of a seed mix if initial restoration is unsuccessful. The prescription to re-seed the more modified fields through use of seed mixes would be inappropriate here. The use of the suggested EM4 seed mix is not welcomed and many of the species in the list would not be suitable for inclusion within a marshy grassland in South Wales. The development should rely on appropriate, sympathetic management techniques to allow the regeneration of species within the existing 'seed bank' to germinate and to supplement this with the planting of local provenance species such as devil's bit scabious to directly assist marsh fritillary butterfly as part of any initial restoration work, followed by other species such as meadow thistle, greater bird's foot trefoil, marsh bedstraw and ragged robin amongst others. No application of fertiliser, manure or lime should be undertaken on these fields.		
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	We recommend the developer refers to INNC publication INCC-Habitat-Management.-The-Marsh-Fritillary-Butterfly-Eng.pdf regarding appropriate restoration and management techniques. Following submission of additional information as part of the full planning application, we would expect a suitably worded condition to be included to ensure the future management of any mitigation proposed.		
Fungi			
NRW	<i>Protected Sites – General Advice: Grassland Fungi</i> We note the submission within Appendix 10.2: Grassland Fungi Survey Report however, the survey effort is limited in some areas. The grassland fungi survey only considers the land that is not being covered with infrastructure and there is no information on the grassland fungi of the land that will be lost/ subject to infrastructure. Although we note that the proposal will unlikely affect SSSI areas, the habitat on site may be of local significance. We therefore recommend further consultation with the Local Authorities in house ecologist on future mitigation.	The fungi survey was designed taking into account the whole Site boundary. The areas surveyed were identified by the surveyor as those most likely to support the targeted fungi types and that information was fed into the Proposed Development design to ensure that infrastructure was placed in areas least likely to support any of the ecological features. The grassland being retained around the proposed infrastructure will be managed in the same way as it is currently and so any fungi population present within those areas would be maintained.	NO CHANGE
INNS			
NRW	We note there are Invasive Non-Native Species (INNS) on site, a full INNS management plan will need to be produced and submitted with the full planning application.	INNS management plan for Himalayan Balsam has now been written and is provided at ES Volume III, Appendix 10.6: Invasive Non-Native Species Management Plan.	CHANGE
Other			

Natural Resources Wales	<i>Protected Species – Lighting</i> We understand that turbines of the height proposed to be used are likely to require aviation lighting; we have no concerns to this in respect of protected species. We note that some security lighting may be required for other parts of the development Eg, Solar farm, BESS. We therefore advise that a suitably worded lighting plan condition is attached to any consent issued for the scheme, requiring the details of proposed lighting to be agreed prior to works commencing on site.	The Applicant notes this comment.	NO CHANGE
Wildlife Trust of South and West Wales	Without seeing final details of the proposal and the ecological surveys and mitigation, we cannot have a clear overall position on the development. However, at present we see no objection in principle to what has been proposed.	The Applicant notes this comment.	NO CHANGE
Wildlife Trust of South and West Wales	<i>Community wealth fund</i> Wildlife Trust of South and West Wales owns and manages Parc Slip, a 125 hectare nature reserve on restored opencast land, immediately adjacent to the proposed Energy Park. The site is very important for a range of habitats and species (including but not limited to marshy grassland, woodland, Dormice, reptiles, Great Crested Newts, dragonflies and damselflies). The site also has a significant network of footpaths, a cycle trail, and a visitor centre and café and receives many visitors each year.	The Applicant has responded to the Wildlife Trust of South and West Wales request to discuss working with the Applicant and advised they would welcome an introductory meeting. Further to this, once operational, the £5,000 per MW community benefit fund has the potential to be utilised for ecological opportunities and enhancement in the local area. Opportunities for ecological enhancement	NO CHANGE

	We are currently reviewing the management of the nature reserve and we would welcome the opportunity, in due course, to discuss working with you and any opportunities to invest either in the public engagement and learning on the site, or in the management of the site for its many important habitats and species.	are identified in the Collaborative Benefits Report .	
Wildlife Trust of South and West Wales	<i>Bats</i> There are many bat records from this local area, as will be immediately apparent in biological records from SEWBRc. Flight lines, migration routes and any nearby roosts all need to be assessed.	Potential impacts of the Proposed Development on foraging, commuting and roosting bats have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE
Wildlife Trust of South and West Wales	<i>Reptiles</i> Parc Slip, immediately adjacent to the proposed energy park, is regionally significant for its reptile populations (including Adder, Grass Snake, Common Lizard and Slow Worm). The footprint of the Energy Park should therefore be assessed for any risk to reptiles.	Potential impacts of the Proposed Development on reptiles have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE
Wildlife Trust of South and West Wales	<i>Great Crested Newts (GCN)</i> GCN are a European Protected Species and also occur at Parc Slip; the potential impact on this species should be assessed.	Potential impacts of the Proposed Development on GCN have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE
Wildlife Trust of South and West Wales	<i>Dormice</i>	Potential impacts of the Proposed Development on dormice have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE

	Dormice are a European Protected Species and also occur at Parc Slip; the potential impact on this species should be assessed.		
Wildlife Trust of South and West Wales	<i>Grassland fungi</i> Wales has an international responsibility for communities of grassland fungi, because of the prevalence and richness of these habitats ('waxcap grasslands') in the country. Waxcaps and other grassland fungi are under-recorded but often occur on botanically species-poor sheep-grazed grasslands if they have otherwise been protected (e.g. unploughed). We strongly recommend a mycological assessment of the fields affected by the proposal, because the fields may hold potential that is not reflected in desktop data searches, and other ecological field assessments tend to take place at the wrong time of year to identify fungal interest.	Potential impacts of the Proposed Development on fungi have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE
Wildlife Trust of South and West Wales	<i>Brown hare</i> Brown hare are a species of conservation concern in Wales and are regularly seen in the proposed Energy Park area. We would like to see mitigation for the potential impacts on them.	As set out in paragraph 10.2.6 of ES Volume II, Chapter 10: Terrestrial Ecology and in the ES Volume III, Appendix 1.1: EIA Scoping Report , it is acknowledged that 'Other priority species' (including brown hare, polecat and hedgehog) have the potential to occur in the works area due to the presence of suitable habitat but they are scoped out of assessment in the ES chapter on the basis that mitigation measures detailed in the Construction Environmental Management Plan will safeguard these	NO CHANGE

		species from injury or killing during vegetation clearance and Site preparation works.	
Wildlife Trust of South and West Wales	SEWBRcC holds many other biological data records for the proposed development footprint; please ensure that these data have been received and appropriate surveys and mitigation put in place on the basis of these records.	As set out in paragraph 10.3.8 of ES Volume II, Chapter 10: Terrestrial Ecology , a data records search was requested from SEWBRcC in May 2023 to obtain information on designated sites (both statutory and non-statutory) and protected and priority species records. Further details can be found in ES Volume III, Appendix 10.1 Ecological Baseline Report . This data helped inform appropriate surveys and mitigation.	NO CHANGE
Wildlife Trust of South and West Wales	We would also note that the original Phase I data set of habitats in this area indicates the presence of some priority habitats (semi-natural broadleaf woodland, semi-improved acid grassland, semi-improved neutral grassland, marshy grassland, dry acid heath, and dry heath / acid grassland mosaic). These are not extensive in area, but their presence should be confirmed and any impacts on them mitigated. Wales has lost over 90% of its lowland species-rich grasslands over the last century and so it's essential that no further losses occur.	Potential impacts of the Proposed Development on priority habitats have been suitably assessed within ES Volume II, Chapter 10: Terrestrial Ecology .	NO CHANGE
Bridgend County	There isn't a great deal to provide in depth comments on thus far in terms of ecology. There is more work to be done as indicated in the submitted documentation.	The Applicant notes this comment.	NO CHANGE

Borough Council	With that being said, I welcome proposals to mitigate the likely effects to the ecological features and species using the site as a result of the development and to secure an appropriate net benefit to biodiversity, and once we have the detail on these we will be able to provide further, more in-depth comments.		
Neath Port Talbot Council	The Council's Ecologist has considered the submitted information and at this time has no comment that they wish to make.	The Applicant notes this comment.	NO CHANGE
Ornithology			
NRW	We have concerns regarding the impacts of the proposals on breeding lapwing. A total of 4 pairs of breeding lapwing were observed over 2 breeding seasons and all 4 pairs utilised different fields over the 2 seasons. All fields appear on aerials to be in open habitats, consistent with the species reluctance to nest in habitats where tall tree, hedges and other tall vegetation is present. The pairs utilised parts of the proposed 'bird mitigation area' in year 1 but preferred other fields in year 2 assuming the breeding birds were the same each year. However, the proposed solar panel array G (<i>now solar fields G and F</i>) appears to be directly impacting the most recent nesting sites of 2 pairs and could indirectly impact a third pair to the east.	In response to NRW's concerns in relation to lapwing the design proposals have changed to reduce the potential impact to nesting lapwing within the Site. As shown in ES Volume IV, Figure 2.1: Proposed Development Layout the solar array in the west of Field G has been reduced with panels sited elsewhere, away from the previous nesting sites to reduce the likelihood of disturbance to known lapwing breeding sites. Subsequently, with the current proposals only one territory within the second year of surveys would be within the direct footprint of the development with only one other territory within 100 m of the Proposed Development. In	CHANGE

	The proposal for woodland planting around solar array G (<i>now solar fields G and F</i>), J and K (<i>now solar fields H and I</i>) could impact their future breeding success due to the species preference for nesting sites in open habitats with minimal trees and low vegetation to minimise predation of their eggs and chicks from predatory bird species. These proposals could have a dramatic impact on this species by reducing suitable habitats available for their preferred breeding sites which could be further impacted by any alterations to future agricultural management of fields across the Site. Tree planting around any existing surface ditches could also impact their ability to forage and feed their chicks.	addition, habitat creation/enhancement proposals have been altered to reduce the proposed woodland planting around known nesting locations and the proposed bird mitigation area to reduce the likelihood of exacerbating the potential effects from predation to nesting lapwing. The final layout and the PAC layout are illustrated in ES Volume IV, Figure 3.2: Design Iterations. Given the embedded and additional mitigation discussed in this chapter, which includes best practice construction mitigation measures, presence of an Ecological Clerk of Works (ECoW) and lapwing habitat creation, it is considered sufficient to mitigate the potential impacts from the Proposed Development.	
NRW	There is a concentration of skylark and meadow pipits breeding records shown in the fields impacted by solar arrays G (<i>now solar fields G and F</i>), H, and I (<i>now solar fields J, K and L</i>) and to a lesser extent, J and K (<i>now solar fields H and I</i>), as shown within the 2-year breeding bird survey data across both years. In addition, the nest sites of both species appear to be present in the fields impacted by solar arrays B, D (<i>now removed from the Proposed Development</i>), H,	As discussed above, habitat creation in relation to lapwing will be provided within the 'bird mitigation area' discussed in this chapter. It is intended that these areas will be managed as wet pasture grassland and will provide suitable nesting habitat for both species to mitigate the potential effects from the Proposed Development. Habitat within	CHANGE

	and I (<i>now solar fields J, K and L</i>), as well as the fields planned for turbines 1-6. The documents reflect that disturbances will occur, and breeding habitat will be reduced. Within the Environmental Statement Volume II Main Written Statement, Chapter 11: Ornithology, I Table 11:14, it states, ‘additional mitigation measure Securing mechanism Non-target Breeding bird assemblage (nesting) Non-target Wintering bird assemblage (foraging) features and breeding/wintering bird assemblage species which would utilise grassland and wet grassland habitat (e.g., lapwing, snipe and skylark) for both nesting and foraging.’ We have concerns that the additional marshy grassland habitat stated above, primarily being created as mitigation for marsh fritillary butterfly will not be preferred habitat chosen by breeding lapwing, due to the small field patterns, surrounding hedgerows and hedgerow trees. It is not clear from the document and maps provided, where other grassland habitat is being created.	the bird mitigation area will provide a short grassy sward managed by livestock with occasional patches of bare ground early in the season for both lapwing and skylark to occupy as nesting sites with occasional tussocks of grassland for juvenile lapwing to hide and/or nesting meadow pipit to occupy. Both the additional mitigation areas of meadow grassland for fungi and wet grassland for marsh fritillary will provide further tussocky open grassland to benefit both skylark and meadow pipit. Although birds are not the specific mitigation prescription for the fungi and marsh fritillary mitigation areas it is intended the habitat will also benefit the lapwing, skylark and meadow pipit populations present within the Site. It is anticipated the mitigation proposals as a collective whole will sufficiently mitigate the potential impacts from the solar elements of the Proposed Development. In respect to the wind farm element of the designs, wind farms typically provide limited impacts to populations of skylark and meadow pipit throughout the lifespan of the development across construction,	
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		operation and decommission in upland environments (Pearce-Higgins J. , Stephen, Douse, & Langston, 2012).	
NRW	The currently apportioned mitigation habitat for birds is focussed for mitigating losses for skylark, meadow pipit, foraging species, and foraging raptors. This area has shown to have been used by breeding lapwing and the management of this area for the proposed target species, may be detrimental to future use of this area for breeding lapwing, especially given the proposed tree planting areas around the solar panel arrays. Our experience from other solar schemes is that mitigation/compensation that relies on land near to fields currently used by the species is largely unsuccessful in retaining breeding lapwing within the landscape. Clarification is needed to understand which fields within the development site are being enhanced to allow lapwing to prospect for breeding sites, given their specific breeding requirements.	See responses above in regard to the 'bird mitigation area' and its management in relation to breeding lapwing.	CHANGE
NRW	We note the winter bird surveys only appear to comprise two visits. We advise that such a restricted winter survey may not properly characterise the winter	As discussed in ES Volume III, Appendix 11.2: 2024 - 2025 Wintering Bird Survey Report , only two survey visits were	NO CHANGE

	use of the Site. We recommend further surveys are undertaken or if not further justification for this is provided.	undertaken as the overall scope of the survey effort was considered sufficient for assessing the bird assemblage present within the Site. The Proposed Development has available data from multiple years of VP surveys across the entire Site in combination with additional surveys for key receptors identified in this chapter. These VP surveys provided a high level of coverage across the entire Site during the VP survey duration. Any notable observations of key species of conservation concern (i.e. non-breeding waders/raptors etc.) would be recorded during these surveys and have been considered in the assessment of the ornithological receptors identified. To verify the 2024-2025 survey, the Applicant has undertaken a further suite of winter bird surveys reported in ES Volume III, Appendix 11.4: 2025 - 2026 Wintering Bird Survey Report which concluded that the assemblage present in the 2025-2026 season was consistent with the previous survey findings. In addition, the nearest designated site of significant importance (SSSI) to any non-breeding bird species or assemblage	
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		were recorded >4.5km from the Site in the desk study. The overall survey effort is sufficient for characterising and assessing the wintering bird assemblage present within the Site.	
Wildlife Trust of South and West Wales	The proposed Energy Park lies in an important landscape for breeding Lapwing. Other ground-nesting species such as Skylark also occur and should be assessed. Barn Owl and Goshawk have been recorded in the local area, both are protected under Schedule 1 of the Wildlife and Countryside Act. Others may also occur.	These comments are noted. Potential impacts of the Proposed Development on these bird species have been suitably assessed within this ES Chapter.	NO CHANGE
Traffic and Movement			
Welsh Government as South Wales Trunk Road Agent (SWTRA) – Consultants WSP acting on their behalf.	Detail needs to be provided to prove access for transporting AILs is achievable from the point of entry to the Welsh trunk road network to the point of egress, that minimises any impact on the safety and free flow of trunk road traffic. This information will be required prior to any determination to ensure the proposed route is a viable option. Please supply the likely traveling weights and dimensions of AILs and swept path analysis for all junctions on the Trunk Road Strategic Network.	This response is acknowledged. ES Volume III, Appendix 12.2: Route Feasibility Study has been updated to include details of AIL swept path assessments of Points of Interest on Route 2 (Northern Access) and Route 5 (Southern Access via Fountain Road) which are the routes being taken forwards as part of the Proposed Development. The updated report also includes AIL swept path assessment of Points of	CHANGE

	Please note, to screen the proposals, the draft abnormal load notifications would be particularly helpful to the Welsh Government as highway authority. For our review to be meaningful we require the accompanying notification template to be filled out as much as possible. There may be many unknowns at this time, but the closer we get to a completed form the more meaningful feedback we will be able to provide. As an absolute minimum we need best estimates for: • Full route details. • Vehicle weight. • Vehicle length. • Vehicle width • Vehicle height We would expect the haulier to fully screen the route and follow notification and road space booking procedures.	Interest on the M4 which are common to both Routes. The assessment has been carried out for a Nordex N163 turbine product as a worst case. This does not preclude the selection of an alternative candidate turbine by the Applicant. Details of the route, vehicle weight and vehicle dimensions is provided within the report. Additionally, a preferred haulier has not been selected by the Applicant at this stage for the transport of AIL. Taking all the above into consideration it is concluded that the completion of an Electronic Service Delivery for Abnormal Loads (ESDAL) application would be premature at this juncture, and could be secured via a planning condition.	
Welsh Government as highway authority for the Strategic Road Network	Details provided further identify the worst case AILs will require the removal of traffic signs, lighting columns etc. details of which can be dealt with under condition (more detail on this below). It is brought to the applicant attention at this stage signs etc. to be dismantled to allow blades to pass must be immediately reinstated, as the infrastructure is safety critical to the running of the Trunk Road Network.	The Applicant notes this comment.	NO CHANGE

Welsh Government as highway authority for the Strategic Road Network	Attached for reference, is the draft version of our “Pulling Together” – Best Practice for Transporting Abnormal Loads in Wales - Procedures and Advice Guidance (PAG) document. For your information please find below our standard planning conditions (taken from the aforementioned PAG document), which Welsh Government would request be applied, should any future planning permission be granted by the authority:	The Applicant notes this comment.	NO CHANGE
Welsh Government as highway authority for the Strategic Road Network	<i>Structural assessment</i> No on-site development works shall be undertaken until: a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and b. details of any improvement works required to such structures as a result of construction of the development have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE

	to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.		
Welsh Government as highway authority for the Strategic Road Network	<i>Condition surveys</i> Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE
Welsh Government as highway authority for the Strategic Road Network	<i>Liability for incidental damage</i> Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE

	scheme shall be implemented as approved throughout the construction phase of the development.		
Welsh Government as highway authority for the Strategic Road Network	<i>Traffic Management Plan</i> AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include: a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority c. number and size of AILs, including loaded dimensions and weights d. number and composition of AIL convoys, including anticipated escort arrangements	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE

	e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary f. convoy contingency plans in the event of incidents or emergencies g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed j. plans for the reinstatement of any temporary works after completion of the construction phase k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition		
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	and reinstatement of all third party land including re-instatement of boundary features l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route n. the appointment and role of a transport coordinator to administer the abnormal indivisible load delivery strategy o. means of control of timing of delivery of AIL movements p. temporary traffic diversions and traffic hold points q. details of banksmen and escorts for abnormal loads r. management and maintenance of layover areas, junctions, passing places, public rights of way and welfare facilities while AIL deliveries take place		
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	s. details of temporary signage. t. details of any alterations to any works that are carried out to enable AIL movements AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority . In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.		
Welsh Government as highway authority for the Strategic Road Network	<i>Highway works</i> No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including: a. the detailed design of any works b. geometric layout c. construction methods d. drainage, and e. street lighting have been submitted to and approved in writing by the local planning authority following consultation with the	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE

	Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site. No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.		
Welsh Government as highway authority for the Strategic Road Network	<i>Road Safety Audit</i> The applicant shall undertake a Road Safety Audit of the scheme (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE
Welsh Government as highway authority for the Strategic	<i>Section 278 Agreement</i> The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement	The Applicant notes this comment and an appropriately worded planning condition will be proposed.	NO CHANGE

Road Network	will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an agreement in place, any consent that may be granted cannot be implemented. For further information on this matter please refer to Welsh Government Procedure & Advice Guidance PAG 109/18: section 38, 184, and 278 Agreements under the Highways Act 1980.		
NPTC	Chapter 12 makes reference to Replacement Local Development Plan 2023 - 2038: Transport Topic Paper (Neath Port Talbot Council, 2024), but no reference is made to the current adopted Neath Port Talbot Local Development Plan.	This response is acknowledged. ES Volume II, Chapter 12: Traffic and Movement has been updated to include reference to the adopted NPTC Local Development Plan (January 2016).	CHANGE
Neath Port Talbot Council	<i>Highway and Pedestrian Safety</i> It would appear from Figure 2.1D – Proposed Development Layout Inset D – that the proposed development of the solar panels A-C and turbine 6 would be accessed from Heol Y Glo at a number of new or improved vehicle access points. It is noted that the proposed engineering work to improve the 90 degree turn in the road to the north of the Inset D development is located within BCBC jurisdiction.	The Applicant notes this comment.	NO CHANGE

	The Council's Public Rights of Way Officer has stated that the Public Rights of Way should be protected at all times and any damage should be rectified by the applicant.		
BCBC Highways	Abnormal Loads The applicant proposes to deliver abnormal loads from the Port of Swansea and two potential AIL delivery routes have been shortlisted Option 3 and Option 5 each accessing the site via a newly formed southern access off New Road, with AILs exiting via the northern access onto the A4063. At this stage, the applicant has not identified a single preferred AIL route, instead deferring the final selection until a later stage, following further engagement and technical assessments. Both shortlisted routes involve extensive physical mitigation, including vegetation clearance, temporary removal of lighting and signage, and potential oversail of third-party land. At the full application stage, a single, clearly preferred AIL route must be presented with the full planning application, supported by swept path analysis, construction methodology, and detailed mitigation proposals. Swept path analysis is not currently provided for several key junctions of the highway	This response is acknowledged. As set out in ES Volume II, Chapter 12: Traffic and Movement, paragraphs 12.6.8 to 12.6.11, both Route 2 (Northern Access) and Route 5 (Southern Access via Fountain Road) are both being progressed as the proposed routes to Site. ES Volume III, Appendix 12.2: Route Feasibility Study has been updated to include details of AIL swept path assessments of Points of Interest on Route 2 and Route 5. The updated report also includes AIL swept path assessment of Points of Interest on the M4 which are common to both Routes. Once AILs have made their delivery, the vehicle will retract to a standard HGV dimension and exit via the northern access.	CHANGE

	network, particularly within Option 5 (e.g. Fountain Road and New Road junctions). This information will be required to assess the viability and safety of the route, particularly where oversail or road modifications are anticipated. The use of the southern access (New Road) is acceptable in principle for inbound AILs only, but must be strictly controlled, physically restricted to general construction traffic, and subject to agreed delivery windows and traffic management measures. It is noted that all AILs will exit via the northern access (A4063) after unloading. Any temporary modifications to this access point to accommodate these movements should be clearly defined and included in any future submission.		
BCBC Highways	CTMP The applicant has submitted an Outline Construction Traffic Management Plan (CTMP) as Appendix 12.1 of the Environmental Statement. While it outlines the overall access strategy and projected construction traffic volumes, the document remains high level and lacks sufficient detail to assess the impact of the development on the local highway network or confirm the adequacy of mitigation measures.	This response is acknowledged. A detailed CTMP, incorporating details of the measures set out in the Statutory Consultee's response will be prepared to discharge a planning condition.	NO CHANGE

	It is considered that the outline CTMP is insufficient for a development of this scale and sensitivity, and will therefore require the submission of a detailed, finalised CTMP to be secured via condition. The CTMP must be submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority, prior to any commencement of works including enabling or clearance activities. The full CTMP should include, as a minimum: • The routing and timing of HGV construction traffic to/from the site in order to avoid network peaks. • The parking of vehicles of site operatives and visitors. • Loading and unloading of plant and materials. • Storage of plant and materials used in constructing the development. • Wheel washing facilities on site. • Measures to control the emission of dust and dirt during construction. • The provision of temporary traffic and pedestrian management where required. • Identification of any required temporary traffic orders, parking suspensions, or road closures. • A strategy for HGV layover, waiting, and marshalling, particularly near the northern access.		
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	• Swept path analysis for all site access junctions and any constrained pinch points along the route. • Details of pre-commencement road condition surveys and monitoring arrangements. • Identification of abnormal weather or seasonal constraints affecting rural lanes.		
BCBC Highways	Northern Access and Visibility Splays The access for general construction and operational traffic is proposed via a new priority junction on the A4063, approximately 200 m south of its junction with Ffordd-y-Gyfraith. This access is intended to serve all inbound and outbound general construction traffic as well as all post-construction operational access. The submitted design (Appendix 12.3) proposes a left-in, left-out arrangement and shows visibility splays of 2.4 m x 120 m, based on a recorded 85th percentile vehicle speed of 48 mph. However, this section of the A4063 is a single carriageway subject to the national speed limit, and no Temporary Traffic Regulation Order (TTRO) has been proposed to formalise any reduction in design speed.	This response is acknowledged. ES Volume III, Appendix 12.2: Route Feasibility Study has been updated to include details AIL swept path assessments of Points of Interest on Route 2 (Northern Access) and Route 5 (Southern Access via Fountain Road). The updated report also includes AIL swept path assessment of Points of Interest on the M4 which are common to both Routes. Drawing 10109816_002 within ES Volume III, Appendix 12.3: Highway Junctions General Arrangements submitted with the application shows a visibility splay of 2.4m x 160m. Posted speed limit along the A4063 in the vicinity of the site is 50mph, therefore the visibility splay shown on the drawing is in	CHANGE

	The Highway Authority does not accept the use of reduced visibility splays based solely on recorded speeds where the national speed limit applies. In line with recognised design guidance (including TAN 18, DMRB, and MfS2), visibility splays must be based on the road's design speed, which in this case is 60 mph. As such, the access should provide visibility splays of 2.4 m x 215 m in both directions unless a formal TTRO is proposed and progressed to reduce the posted speed limit to 40 mph, alongside enforceable traffic-calming and signage. At present, neither option is referenced within the PAC submission, nor is a Stage 1 Road Safety Audit provided for the new access, therefore the Highway Authority requires the above at full planning application stage. A second access point is proposed off New Road forming the southern access to the site. This access is intended to be used exclusively for inbound Abnormal Loads (AILs) during the turbine delivery phase, after which it will be physically restricted and not used for general construction or operational traffic. The Highway Authority accepts the principle of a dedicated AIL access however, a number of issues remain unresolved in the current submission:	line with the recognised design guidance (including TAN 18, DMRB and MfS2). There is no intention to propose a Temporary Traffic Regulation Order (TTRO). Given the above and, as the proposed access junction is an upgrade to an existing access, relevant visibility splays are met and the A4063 is not a Trunk Road, a Stage 1 Road Safety Audit is not considered necessary and can be conditioned; an approach advocated in the Welsh Government Transport Directorate response in relation to trunk roads. AILs will enter the Site from either the northern and southern access point. Once the AIL has made its delivery, it will retract to the size of a standard HGV and therefore will be capable of turning within the engineered area of each crane pad before proceeding to the northern access/exit point.	
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	- No swept path analysis has been provided for key junctions along the southern route, including the New Road / Fountain Road junction, which is known to be geometrically constrained. - The applicant proposes to enter via the southern access and exit via the northern access, which indicates that AILs will need to turn within the site or complete a loop through internal roads. No detail is provided to confirm how this will be achieved or managed.		
BCBC Highways	<i>Temporary Road Closures</i> The applicant identifies the need for temporary road closures to facilitate construction traffic and AIL movements. Specifically, the following closures are referenced: - Ffordd-y-Gyfraith – anticipated closure of up to three weeks - Llangynwyd Mountain Road – anticipated closure of up to six weeks While the Highway Authority acknowledges the closures are necessary for safety and vehicle movement reasons, the full application should also include diversion route plans or traffic management layouts. In addition a clear strategy for maintaining pedestrian, cyclist, and emergency access throughout	This response is acknowledged. ES Volume II, Chapter 12: Traffic and Movement and ES Volume III, Appendix 12.1, Outline Construction Traffic Management Plan have been updated to include reference to the proposed road closures. An Outline Signing Strategy for the diversion routes has also been prepared and is illustrated by ES Volume IV, Figure 12.6: Outline Signage Strategy Sheet 1 of 2 and 12.7: Outline Signage Strategy Sheet 1 of 2. Comments regarding accessibility for pedestrians and cyclists are noted, and the Applicant will maintain access for	CHANGE

	closure periods will be required. It would be beneficial to contact the councils Streetworks department streetworks@bridgend.gov.uk as soon as possible to discuss requirements.	users of the Ridgeway Walk Public Right of Way during construction. Cyclists will be required to use the signed diversion routes during these relatively short period of closures.	
Population			
BCBC	The Rights of Way team have now had an opportunity to consider the documents associated with planning application and would advise that the public rights of way across the development site have clearly been considered throughout the development process. In fact, as is noted in the documents, there have been a number of meetings between the developer and the Rights of Way team. In addition the developers representatives also attended a recent meeting of the Bridgend Local Access Forum. As a result of those meetings the proposed development will not impact on any of the public rights of way crossing the site meaning there will be no requirement for any paths to be permanently diverted. It has also been agreed that the developer will provide a financial contribution via a s.106 Agreement for enhancements to the rights of way network across the site. The amount of funding still has to be determined. In addition the developer has agreed to provide an Access Management Plan which will need to be	As further detailed in ES Volume II, Chapter 13: Population, Section 13.7a detailed Access Management Plan would be produced and secured via condition. ES Volume III, Appendix 13.1: Outline Access Management Plan provides the outline framework for the future detailed Access Management Plan. The comment has not required any changes to the assessment.	NO CHANGE

	agreed by the County Borough Council and Neath Port Talbot CBC prior to construction and operation. In light of the above I can confirm that the Rights of Way team would have no objection to the proposed development subject to the proposed financial contribution for improvements to the rights of way network and the Access Management Plan being covered by relevant conditions.		
Aviation			
Ministry of Defence (MOD)	The MOD was previously consulted on the scoping for the proposed DNS application and provided a response to Welsh Government dated 27 February 2024. The development at that stage consisted of 10 wind turbines with a blade tip height of 230m. This response set out that, subject to lighting and charting conditions being included on any consent granted, the MOD has no objection to the scheme. The MOD was subsequently consulted on a reassessment of proposed changes which reduced the number of wind turbines to 6, reduced the blade tip height to 200 metres, and relocated the 6 turbines, and provided a response to John Taylor of WPAC dated 14 February 2025. This response set out that, subject to lighting and charting conditions being	The Applicant notes this comment.	NO CHANGE

	included on any consent granted, the MOD has no objection to the scheme.		
Ministry of Defence (MOD)	The current consultation relates to the pre-application consultation before applying for planning permission for a Development of National Significance and consists of 6 wind turbines with a blade tip height of 200 metres and at the same locations as provided for the reassessment. The development has been assessed using the location data (Grid References) below provided in the Environmental Statement documents on the applicant's website. The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements. <i>Physical Obstruction</i> In this case the development falls within an area designated Low Flying Area 7 (LFA 7). Within this area fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address this impact, and given the location and scale of the development, the MOD require conditions	The Applicant notes this comment.	NO CHANGE

	are added to any consent that might be issued requiring that the development is fitted with aviation safety lighting, and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A (<i>copied below</i>). The development proposed includes wind turbine generators that are a maximum height of 200m above ground level (agl) and which would be subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification. As a minimum the MOD would require the perimeter turbines to be fitted with MOD accredited Infra-red (IR) lighting.		
Ministry of Defence (MOD)	Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development. The MOD must emphasise that the advice provided within this letter is in response to the information contained within the Environmental Statement documents, all dated April 2025, that are published on	The Applicant notes this comment.	NO CHANGE

	the applicant's website www.mttenergypark.co.uk. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response. Further information about the effects of wind turbines on MOD interests can be obtained from the following website: MOD: https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding		
Ministry of Defence (MOD)	<i>Appendix A: Condition – Aviation Lighting</i> Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the relevant Planning Authority in conjunction with the Civil Aviation Authority and the Ministry of Defence defining	The Applicant notes this comment. No further action is required at this stage of the application.	NO CHANGE

	how the development will be lit throughout its life to maintain civil and military aviation safety requirements as required under the Air Navigation Order 2016 determined necessary for aviation safety by the Civil Aviation Authority. This should set out: a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above terrain features) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and b) the location and heights of all wind turbine generators and any anemometry mast featured in the development identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used. Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development. Reason for condition: To maintain aviation safety.		
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Ministry of Defence (MOD)	<i>Appendix A: Condition - Aviation Charting and Safety Management</i> The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information: a) the date of the commencement of the erection of wind turbine generators; b) the maximum height of any construction equipment to be used in the erection of the wind turbines generators; c) the date any wind turbine generators are brought into use; d) the latitude and longitude and maximum heights of each wind turbine generator and any anemometer mast(s). The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development. Reason for condition: To maintain aviation safety.	The Applicant notes this comment. No further action is required at this stage of the application.	NO CHANGE
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Major Accidents and Disasters (MAD)			
Health and Safety Executive (HSE)	With reference to Figure 1.2 Planning Application Boundary on which is shown a red-lined Site Boundary, there are areas of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s) operated by Wales & West Utilities: a. Brynna / Margam (VW015) [Transco ref: 1583, HSE ref: 7317] - Wales and West Utilities b. Jamont (British Tissues) Branch (VW016) [Transco ref: 1573, HSE ref: 7304] - Wales and West Utilities The red-lined Site Boundary does not currently fall within the consultation distances of any Major Accident Hazard Installation(s). HSE will not advise against the proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Pipeline(s). Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline	The location of solar panels within the Site have been revised to accommodate necessary buffers to hazard pipelines that pass through the Site.	CHANGE

	modified prior to the determination of a future application, the HSE reserves the right to revise its advice. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.		
Health and Safety Executive (HSE)	<i>Explosive sites</i> Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.	The Applicant notes this comment.	NO CHANGE
Design			
Neath Port Talbot Council	The figure 2 – Proposed Development Layout appears to show turbine 6 located within 185m of the public highway – Heol Y Glo. As such, the proposed turbine would be located with the topple distance of this highway. It is generally understood that the ‘Topple Distance’ is taken to be the height of the turbine plus 10% or where related to a highway, the height of the turbine plus 50m. It is understood that the proposed turbines would be 200m in height which would make the required topple distance for the proposed turbines	Turbine T06 is located slightly within topple distance (200 m) from the highway, at 175 m, but would not oversail it. This is due to the requirement to meet the necessary ecological separation distances between the turbine and the adjacent woodland blocks, as well as accommodating the turbine hardstanding within the topography.	

	to be between 220m and 250m. Based on the information shown on figure 2 – Proposed Development Layout, turbines 6 would be located approximately 185m from the closest edge of the public highway, which is well within the guidance for a potential adverse impact upon highway safety in the event of a turbine fall. While it is agreed that commercial wind turbines rarely fall, with the last documented case being only in 2022, it is considered that the submitted application should explain why turbine 6 has been located in such close proximity to a public highway and why it cannot be located in a position outside of a topple distance to a highway and if that is not possible a risk assessment together with any proposed mitigation measures that would justify the turbine remaining in the current proposed location. Issues regarding topple distances were included in our earlier Scoping information response to PEDW.	As discussed in ES Volume II, Chapter 2: Proposed Development Description (paragraphs 2.5.31 to 2.5.34), turbines would automatically shut down during extreme weather conditions (such as extreme wind or cold) and would only restart, with a slow rotational speed, once conditions have subsided. Upon restarting it is considered that the risk to public safety would be extremely low given that any unfrozen snow or ice would be small and lightweight enough to allow the rotor assembly to rebalance before restarting and would therefore not likely result in a major accident to users of the nearby highway. Furthermore, the design and construction of the wind turbines will be completed in compliance with British Standards for Engineering and informed by detailed analysis of land conditions from site-specific ground investigations. Once complete and operational, regular maintenance checks and inspections of the wind turbines will be undertaken. This will ensure any risks associated with highways being located within topple distance are as low as reasonably practicable, as with any other built structure.	
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Neath Port Talbot Council	It is noted that the proposed boundary fencing associated with the development is shown as a mixture of 3.6m and 2.4m high deer fencing (figure 2.20 – Solar Fencing and Security Gate Elevation) and 2.4m high palisade fencing (Figure 2.21 – BESS and Substation Fencing and Security Gate). The Authority would suggest that a weld mesh product is use instead of a palisade fence as it less visually intrusive, while still offering a similar, if not better level of security.	These comments are noted and the plans have been updated. 2.4m high deer fencing is proposed around the solar parcels and 2.4 m high palisade fencing is proposed around the substation; the BESS element has been removed from the Proposed Development. Details of the fencing are provided in ES Volume IV, Figure 2.10: Solar Fencing & Security Gate Elevations & CCTV and Figure 2.11: Substation Fencing & Security Gate Elevations & CCTV.	CHANGE
Pollution Prevention			
Natural Resources Wales	The documents provided consider the potential environmental effects in terms of water quality for the multiple watercourses which run through the site. Silt pollution due to runoff from exposed ground and containment of pollutants such as concrete in the construction phase are the main water quality concerns. Mitigation is listed primarily as part of the Outline Construction Environmental Management Plan (OCEMP) which is stated to be developed into a detailed CEMP by the Principal Contractor. We would advise that a full CEMP is conditioned if future planning permission is granted.	The applicant is willing to accept a condition for a detailed CEMP as part of any planning permission granted.	NO CHANGE

Natural Resources Wales	Annex C of the OCEMP lists numerous buffer regions between the work site and watercourses. Surface water and drain mitigation is listed to be inspected by the Senior Foreman, this is suggested to be weekly. We advise that this may not be sufficient under periods of heavy rainfall and increased runoff and recommend that inspections are increased to daily during heavy rainfall periods with records kept on site of their inspections/actions taken. In addition to this, we recommend that inspections of the watercourses themselves should be monitored for any impact from the work.	These comments are noted, and the outline CEMP has been updated to incorporate these requirements. ES Volume III, Appendix 2.1: Outline Construction Environmental Management Plan has been updated.	CHANGE
Natural Resources Wales	Annex C states 'Contaminated water must be treated or discharged off site using an appropriate waste permit' and 'If necessary temporary bunding and/or settlement ponds will be installed to allow for isolation and onsite treatment of any sediment laden or contaminated water prior to managed discharge'. If any discharge from proposed ponds cannot be considered as clean uncontaminated water a discharge permit will be required. As previously advised in our scoping response any chemical dosing e.g., using a SiltBuster unit would also require a discharge permit. Further advise can be found via our website, Natural Resources Wales / Find	These comments are noted and appropriate permit and/or licences would be obtained where required.	NO CHANGE

	out if you need a permit for discharges to surface water and groundwater. 3.11.5 of the OCEMP suggests that water requirements may be met using a private water supply. If this is to be managed via an abstraction, please note that a licence may be required if >20m3 per day. Further advice can be found via our website, Natural Resources Wales / Find out if you need a water abstraction or impoundment licence		
Natural Resources Wales	<i>Invasive Non-Native Species (INNS)</i> We note there are Invasive Non-Native Species (INNS) on site, a full INNS management plan will need to be produced and submitted with the full planning application.	The Applicant acknowledges Natural Resources Wales' request for further information and has provided it via the relevant ES document. An INNS management plan for Himalayan Balsam has now been written and is provided at ES Volume III, Appendix 10.6: Invasive Non-Native Species Management Plan.	CHANGE
Other			
Neath Port Talbot Council (Head of Planning and	<i>Officer's Response P2025-0290</i> I refer to the above planning application referred to this Council in accordance with the above Act and order and would offer no objections.	These comments are acknowledged.	NO CHANGE

Public Protection)			
Neath Port Talbot Council	While the majority of the proposed development is located across the jurisdiction boundary and within the Bridgend Country Borough Council area; it is noted that the proposed development has been amended since the request for a screening opinion was submitted to PEDW. The proposed development located within the jurisdiction of Neath Port Talbot Council (NPTC) now includes only one wind turbines (labelled No. 6) and an area of solar panels. The previous scheme included two wind turbines but no solar panel development. While it is noted that we have been consulted under the PAC regulations as a neighbouring Authority, our response will also provide information in relation to the proposed development included within our Authority area.	These comments are acknowledged.	NO CHANGE
Neath Port Talbot Council	<i>Local Context and Constraints</i> - Public Rights of Way: 9/64.PT/3, 9/65.PT/1, 9/67.PT/2. - An area of the site that is located within our jurisdiction is located within the Coal Authority's High Risk Development area.	These site constraints are noted and are incorporated into to the relevant ES Volume II Chapters 5-14 , and appendices within ES Volume III .	NO CHANGE

	- The Council's records show that there is the potential for Historic Ground Contamination within the area of the site within our Authority. - Part of the application area within the NPTC boundary is located within the outer zone of a Health and Safety Executive's consultation area. - The application area is shown to be located within a National Grid – Overhead Powerline – Plant Protection zone. - The area a number of Cadw Registered Features located within the Development Management Order's consultation zones for the proposed development. Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.		
Network Rail	Network Rail have no objections in principle to the proposed development. Any works on this land should be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise (assetprotectionwales@networkrail.co.uk)	The Applicant notes this comment.	NO CHANGE

6 Summary

- 6.1.1 The purpose of the pre-application consultation process was to engage local residents, community representatives, statutory consultees and interested parties throughout the development of the proposals for Mynydd Ty-talwyn Energy Park.
- 6.1.2 The consultation and engagement activities undertaken helped to raise awareness of the process and ensured it remained accessible to all individuals with a potential interest in the Proposed Development.
- 6.1.3 This document fulfils the requirements of sections 7, 8, 9, and 11 of the DNSPWO and provides a full account of the statutory consultation, including publicity measures, deadlines, and activities required under section 61Z of the 1990 Act. It includes copies of all relevant notices, declarations of compliance, and details of required consultees.
- 6.1.4 The Applicant has carried out extensive informal consultation on the Proposed Development through early engagement and non-statutory consultation, as detailed in Chapter 2 of this report.
- 6.1.5 A comprehensive local community consultation was undertaken concurrently with the statutory consultation period, as reported in Chapter 4 of this report.
- 6.1.6 In accordance with section 11(a) of the DNSPWO, this report explains how the Applicant complied with section 61Z of the 1990 Act, and how responses received from consultees under section 61Z(3) or (4) were taken into account in the final proposals and associated ES.
- 6.1.7 During the pre-application period, the Proposed Development was refined in response to feedback from relevant community and technical consultees. The final proposals therefore reflect significant technical work informed by this consultation process.