



Pennant Walters

GLANLLYNFI GARTH WIND FARM

Draft Environmental Statement

Appendix 1B - EIA Scoping Direction



EIA Scoping Direction

DNS CAS-04687-J2G4Q0 - Glanllynfi
Garth Wind Farm

Prepared by:

Anthony Agbo MSc
Henry McCoull (Student Planner)
Georgia Peters MSc

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 02 March 2026, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33 of the 2017 Regulations for a Scoping Direction in relation to a proposed development for the construction and operation of up to eight turbines on land to the east of Maesteg in South Wales by Pennant Walters.

The request was accompanied by a Scoping Report (SR) that outlines the proposed scope of the Environmental Statement (ES) for the proposed development:

‘2026-02-12 - EIA Scoping Request – 00 – Scoping Report’ available via the Planning Casework Porta - <https://planningcasework.service.gov.wales/> and search **CAS-04687-J2G4Q0**

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

2. Site Description

The Scoping Report states in Section 2.2.1 that the site covers two land parcels comprised of semi-improved grassland, marshy grassland and heathland. The locations are identified below:

- Pwll-yr-lwrch (hereafter ‘Northern Array’) – Grid Reference SS 87102 92887; and
- Cynhordy (hereafter ‘Southern Array’) - Grid Reference SS 88988 89854.

The Scoping Report also states in Section 2.2.2 that the proposed site sits on mountainous terrain east of Maesteg, above the valley settlements, forming part of the wider moorland ridge landscapes characteristic of this part of Bridgend County Borough.

The Glanllynfi Garth Wind Farm is proposed on upland moorland landscapes located between several villages and valleys in northern Bridgend County. The site consists of elevated, open terrain between the Llynfi and Garw Valleys, with existing access tracks and significant separation from residential settlements due to the steep valley profiles.

Further information is available in Section 2 of the SR.

3. Proposed Development

The proposal as described in the SR is for the construction and operation of a wind farm of up to eight turbines (with a maximum blade-tip height of 180 m), together with associated infrastructure including access tracks and a substation.

The development would also include:

- Transformer housing
- Temporary site offices
- Overhead line / grid connection infrastructure (According to section 2.3.15 of the SR, the Applicant has undertaken discussions with NGED about the grid connection for the proposed development and that is intended that the connection would be overhead through wooden poles).
- A total generating capacity of up to 37 MW
- Potential upgrades to existing access tracks associated with Pen y Cymoedd and Llynfi Afan wind farms

Further information is available in Section 1 and 2 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

The SR indicates that existing access tracks serving Pen y Cymoedd and Llynfi Afan wind farms will be used but may need upgrading.

In the ES, any maps, drawing and illustrations that are proposed to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections.

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

4. History

The SR identifies in Section 5.2.15 that the proposed development is located within the South Wales Valleys National Landscape Character Area, which is characterised by a significant industrial and mining legacy.

The SR identifies that the wind farm is proposed on agricultural land situated on the upland ridges between Maesteg, Pontycymer, Blaengarw and Nantyffyllon.

The SR says in Section 2.3.7 that there is a history of wind farm development around the development site.

The SR describes the site as open, upland agricultural and moorland terrain, indicating that the land has historically been used for grazing and open countryside purposes.

5. Consultation

In line with Regulation 33(7) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Bridgend County Borough Council
- Neath Port Talbot Council
- Rhondda Cynon Taf County Borough Council
- Natural Resources Wales
- Cadw
- Agricultural Land Use & Soil Policy, Welsh Government
- Transport Directorate, Welsh Government
- Dŵr Cymru
- Health and Safety Executive
- Mining Remediation Authority
- NATS
- Defence Infrastructure Organisation
- Civil Aviation Authority
- South Wales Fire and Rescue Service
- Mid and West Wales Fire and Rescue Service

Additional consultation was undertaken with:

- Bannau Brycheiniog National Park Authority (Neighbouring Authority)
- Caerphilly County Borough Council (Neighbouring Authority)
- Swansea Council (Neighbouring Authority)
- Vale of Glamorgan Council (Neighbouring Authority)
- Joint Radio Company
- Arqiva

Responses received are included in **Appendix 1**.

6. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider

a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified Regulation 17 and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation, then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

Rochdale Envelope: Whilst not specifically raised in the SR for this project, PEDW has previously been asked whether the 'Rochdale Envelope' approach is appropriate for a DNS application for wind turbine development. The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects 'Advice Note Nine: Rochdale Envelope', provides further detail on the Rochdale Envelope approach:

<https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope>

Whilst this approach may be appropriate for the pre-application Environmental Impact Assessment work, it should be noted that a DNS application is an application for full planning permission under the Town and Country Planning Act 1990 (as amended). It is therefore not possible to submit a DNS application with as much uncertainty over what is proposed as is acceptable for an Outline application, or for a Development Consent Order under the Planning Act 2008. At the point of application, the following matters should be clear:

- Number of turbines
- Locations of the turbines (subject to micro-siting considerations)
- Maximum tip height
- Maximum hub height

It is open to the Applicant to propose that final hub height and rotor diameter could be left to be dealt with via a written submission to the Local Planning Authority, as a pre-commencement condition (should planning permission be granted) provided the condition specifies that the hub height must not exceed (x) m and the rotor diameter shall not exceed (y) m. As with other conditions, the Applicant should seek to agree a suitable form of wording with the Local Planning Authority, which can be submitted for the appointed Inspector's consideration.

The Applicant should also consider that, in some cases, different methods of construction may lead to different significant effects. This is particularly relevant in wind farm projects where different type of foundations may be required. The ES should be clear that the worst-case scenario is addressed consistently in terms of development footprint including construction areas.

Once that level of certainty is reached for the application, the ES should be reviewed and if necessary updated to ensure it properly captures the impacts of the application being submitted. If the Applicant has any further queries about the scope for flexibility in the DNS application process, they should contact PEDW.

Micro-siting: PEDW accepts the principle of micro-siting in applications for wind turbines. The ES should be prepared using a clearly identified worst case scenario and final design should not lead to greater likely significant effects than identified in the ES.

Scoping Flexibility: Further to the stated position on micro-siting and the above comments on how the Rochdale Envelope is not an acceptable approach for the eventual application, PEDW is content with the ES being prepared on the basis of design parameters (e.g. dimensions of turbines and associated infrastructure), but the locations of infrastructure should be fixed (subject to micro-siting) and the ES should assess the relevant worst-case scenario for each aspect chapter. PEDW is content that the scoping is based on a maximum scale of development as a worst-case scenario, and revisions can be made to the scheme prior to submission, but the Applicant is advised to contact PEDW where substantial changes are expected, or where changes would affect the worst-case scenario.

Shadow Flicker: PEDW notes that in 'Review of Light and Shadow Effects from Wind Turbines in Scotland' (<https://www.climatechange.org.uk/projects/review-of-light-and-shadow-effects-from-wind-turbines-in-scotland/>, L.U.C. for climateXchange, 2017) it was found that "there is a lack of evidence to support the use of ten rotor diameters as a cut off, and this is entirely down to misinterpretation of the original reference to this distance."

The ES should provide a clear rationale as to the methodology adopted, and why it is considered appropriate given the scale of turbines proposed and the requirement for more nuanced assessment suggested by the concerns raised in the above document.

6.1 Baseline

Schedule 4 of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

6.2 Reasonable Alternatives

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution. Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

6.3 Currency of Environmental Information

For all environmental aspects, the Applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

6.4 Cumulative Effects

In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting from “the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources”.

The Planning Inspectorate’s guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

The Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in the Advice.

There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to other renewable energy proposals.

Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Planning Authority, NRW, Cadw and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

6.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

6.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

6.7 Transboundary Effects

Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

6.8 Topics Scoped In but not subject to a standalone chapter

For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

7. Environmental Impact Assessment Aspects

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has / has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

7.1 Aspects Scoped In

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

- Landscape and Visual**
- Historic Environment**
- Biodiversity**
- Ornithology**
- Water Environment**
- Ground Conditions**
- Traffic and Transport**
- Noise**
- Shadow Flicker**
- Socioeconomics**
- Aviation and Telecommunications**
- Population and Human Health (not as a standalone chapter)**
- Climate Change (not as a standalone chapter)**
- Major Accidents and Disasters (not as a standalone chapter)**
- Air Quality (not as a standalone chapter)**
- Material Assets and Waste (not as a standalone chapter)**

8. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
Description of the Development			
ID.1		General	The Applicant's attention is drawn to Natural Resources Wales's (NRW) comments under Section 1 "General scoping advice" of their response in Appendix 1. NRW state that the description of development in the ES should include: • The purpose and physical characteristics of the proposal; • Location, development size (in hectares), and configuration of the development, including the flexibility of the site layout; • Procedures for good working practices; • Identification of appropriate pollution contingency and emergency measures for watercourses on site; • Timing of all works and contingency plans should slippage in the programme occur; • Maintenance requirements of structures; • Arrangements for maintenance and management of any habitats within the site; • Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure. PEDW recognises that information on these points may be relevant elsewhere in their other chapters of the ES. This should be signposted in the description of development were necessary.

ID	Reference in Scoping Report	Issue	Comment
ID.2	2.3.15	Grid Connection	PEDW note the description of development includes the mention of a grid connection. Neath Port Talbot Council (NPTC) highlights that the precise nature and routing of the grid connection has not been confirmed. The SR states that: “The Applicant has undertaken discussions with National Grid Electricity Distribution (NGED) with regard to the grid connection for the Proposed Development. It is understood that the intention is for NGED to deliver the connection and at the time of writing this Scoping Report, it is assumed that the connection would be overhead (via wooden poles). The connection to the PoC will be included in the DNS Application for the Proposed Development.” NRW's, NPTC's and Rhondda Cynon Taf County Borough Council's (RCTCBC) responses in Appendix 1 all have concerns about the environmental impact of a potential grid connection. As the SR does not provide appropriate details regarding this grid connection, the ES should address the grid connection in a proportionate manner based on the level of certainty as to the likely connection route at the time of the DNS application being made. An appropriate level of assessment of the grid connection's impact in relation to the relevant topic chapters should be undertaken in the ES. If, as the SR states, the grid connection will form part of the DNS application, full detailed assessments should be included in the ES.
General			
ID.3		Planning History	The Applicant's attention is drawn to the section of Bridgend County Borough Council's (BCBC) response in Appendix 1 regarding the site's planning history.

ID	Reference in Scoping Report	Issue	Comment
Landscape and Visual Impact Assessment			
ID.4	5.2.4	NatureScot (2025) Special Landscape Qualities – Guidance on assessing effects	The Applicant's attention is drawn to the Bannau Brycheiniog National Park Authority (BBNPA)'s comments in Appendix 1 that while the SR states the NatureScot Guidance is accounted for, it does not commit to the methodology set out within. The NPA recommends a more appropriate Landscape and Visual Impact Assessment (LVIA) study area is used with additional desk and site-based data to more appropriately assess the impact on the special qualities of the Bannau Brycheiniog National Park (BBNP) to be in line with Step 2C of the NatureScot Guidance. PEDW is in agreement that the Applicant should consult with BBNPA and NRW on an appropriate study area for the LVIA in the ES.
ID.5	Figure 5.1b	Study area	The Applicant's attention is drawn to BBNPA's comments in Appendix 1 that the LVIA Zone of Theoretical Visibility (ZTV) does not include areas of the BBNP that would theoretically be impacted, and therefore the study area should be expanded from 27 km to 28 km.
ID.6	Table 5-2	Viewpoints	The Applicant's attention is drawn to NPTC's comments that despite the ZTV potentially extending across parts of NPTC (the response mentions upland areas such as the Margam uplands and the western slopes of the Afan Valley) the current viewpoints listed in the SR do not appropriately represent these areas. A list of recommended viewpoints by NPTC can be found within their response in Appendix 1. PEDW is in agreement with this point, and recommends the Applicant liaises further with NPTC on this matter. Additionally, the Applicant's attention is drawn to NRW's comments concerning the BBNP and the Gower National Landscape (GNL). PEDW is in agreement

ID	Reference in Scoping Report	Issue	Comment
			that the ES should consider the following recommendations NRW have provided for Table 5-2: NRW highlight that viewpoint 19 is an area where existing tree screening may restrict visibility and recommends Mumbles Hill as an additional complementary location for uninterrupted views over Swansea Bay. NRW recommends other viewpoints alongside viewpoint 20 for the BBNP that are more elevated. NRW highlights that existing wind energy developments may be visible from these recommended viewpoints for the BBNP. The ES should include the viewpoints requested by NRW. The Applicant should liaise with the relevant LPAs, NRW and BBNPA over the final selection of viewpoints. If the Applicant declines to incorporate any viewpoints suggested by the relevant consultees, a robust justification should be included in the ES.
ID.7	5.2.31	Alternative / additional viewpoints	Paragraph 5.2.31 of the SR states that: “Consultees should note that should alternative/ additional viewpoint locations be recommended as part of their response to the Scoping Report, then the photography would likely be undertaken outside of the optimum period for photography whilst trees are in leaf.” The Applicant is reminded that Technical Guidance Note LITGN-2024-01 by the Landscape Institute states in Section 6: "Regarding seasonal constraints, it is within the competence of a landscape professional to be able to describe how the landscape and views would vary with the seasons, and to take account of these changes in their assessment."

ID	Reference in Scoping Report	Issue	Comment
			Considering the viewpoints highlighted by consultees in the above issues, PEDW recommends that the Applicant should liaise with consultees regarding any concerns with this limitation. PEDW stresses that, in any case, should these additional or alternative viewpoints be photographed within a suboptimal time period, the ES should report on these limitations and include details of how professional judgement is applied when accounting for the additional screening provided by the leaves when assessing the significance of the impact. Failure to do so would result in the potential for the significance of the impact to be misjudged. The ES should include the Applicant's rationale as to why this would be acceptable and therefore, PEDW recommends this limitation be appropriately addressed in the LVIA chapter of the ES.
ID.8		Special Qualities (SQs)	NRW is in agreement with SQs for BBNP and GNL scoped into the LVIA, although recommends that the ES use these SQs as headings and that assessment of the impacts to them are informed by detailed supporting evidence such as the BBNP Landscape Character Assessment August 2012 and LANDMAP.
ID.9	Appendix A	Y Bryn Wind Farm	The Applicant's attention is drawn to NPTC's comments that the Y Bryn Wind Farm, largely located within NPTC, has not been considered in the SR in relation to cumulative landscape and visual impacts arising from surrounding existing, consented and proposed wind energy developments. NPTC highlights that despite Y Bryn Wind Farm being refused, the proposal is undergoing Judicial Review, and the SR should consider the scheme within its cumulative assessment or state why it has been scoped out. PEDW is in agreement with NPTC on this point.

ID	Reference in Scoping Report	Issue	Comment
			The Applicant can find more information on the Y Bryn Wind Farm scheme on the Planning Casework Portal: https://planningcasework.service.gov.wales/ by searching for 3264571.
ID.10	Appendix A	NPTC upland landscape cumulative assessment	Additionally, NPTC state that with the number of large-scale wind energy developments in operation around the proposed development, the LVIA should consider the cumulative landscape and visual impacts across the upland landscape that extend between the Llynfi, Afan and Ogmore valleys. Assessment of cumulative wind energy development should use elevated viewpoints and recreational routes within the upland landscape. PEDW is in agreement with NPTC on this matter and the Applicant should seek agreement from NPTC as to the approach to be adopted in the ES.
ID.11		Design considerations	The Applicant's attention is drawn to NRW's comments advising that the ES should clearly explain how the LVIA findings have influenced the design, including turbine location, scale, number and configuration. NRW recommends the following design guidance in relation to the LVIA: • Designing for Renewable Energy in Wales, Design Commission for Wales, November 2023 • Planning Policy Wales (5.9.21) NRW quotes specific passages from these, which can be found in their response in Appendix 1. The final ES should clearly address the alternatives considered and how environmental considerations influenced the final proposal.
Historic Environment			
ID.12	5.3.43 – 5.3.46	Unrecorded sites	The Applicant's attention is drawn to Cadw's advice that along with a Historic Environment Desk-Based Assessment (HEDBA), the DTM and DSM Lidar datasets should be analysed to help target previously unrecorded sites within

ID	Reference in Scoping Report	Issue	Comment
			the application area. More information about the methodology, should new sites be discovered, can be found in Cadw's response in Appendix 1. PEDW recommends the Applicant consult with Cadw on this matter.
ID.13	5.3.43 – 5.3.46	Sub-surface archaeology	PEDW is in agreement with Cadw's advice that Heneb should be consulted with following the Desk-Based Assessment and walkover, on the need for a geophysical survey on the proposed development site as sub-surface archaeology may not be apparent from a desk-based and walkover study. Cadw provides advice that sub-surface archaeology may be present where there are high levels of surface monuments, or where surveys cannot accurately define the nature of surface or sub-surface features. Cadw advises that geophysical features whose dating, function, level of preservation and importance cannot be properly informed, then additional evaluation is needed in accordance with Planning Policy Wales (PPW) and Technical Advice Note (TAN) 24: the historic environment.
ID.14	5.3.43 – 5.3.46	Peat archaeology	PEDW is in agreement with Cadw's advice that impact to peat within the development area should be scoped into and assessed within the Historic Environment chapter of the ES due to potential sub-surface archaeological features. Where the placement of turbines cannot avoid peat deposits, a suitable scheme of sampling, analysis, dating and reporting will need to be completed on such deposits using appropriate sampling techniques advised by a paleoenvironmental / geoarchaeological specialist for assessment in the ES. PEDW recommends the Applicant consults with Cadw and Heneb on this matter.
ID.15	5.3.43 – 5.3.46	Time period	Cadw draws the Applicant's attention to TAN 24 Paragraph 4.7 and PPW Paragraph 6.1.26 which stress the importance of ensuring the relevant

ID	Reference in Scoping Report	Issue	Comment
			information regarding archaeological remains is available before an application is submitted. Cadw stresses that the Applicant should have a sufficient time period to complete the archaeological assessment, reporting and mitigation discussions before application submission in accordance with the above guidance on archaeological evaluation. PEDW is in agreement that the ES should be comprehensive in its assessment of the historic environment. Failure to do so may result in delays at the examination stage if additional information is required.
ID.16	5.3.47 – 5.3.49	Designated historic assets.	Cadw is in agreement with the assessment which follows the Welsh Government guidance in “The Setting of Historic Assets in Wales”. In “Annex A” of their response, Cadw provides a list of identified designated historic assets that are within the ZTV and are within 5km of the development. The ES should include an appendix of the results of a stage 1 assessment carried out for all the listed designated historic assets. Stage 1 assessments should determine the need for carrying out stages 2 to 4 on specific assets in the ES.
ID.17	5.3.50 to 5.3.52	Assessment of Significance of the Impact of Development on Historic Landscape (ASIDOHL)	Cadw highlights that since the development area is not within a registered historic landscape, an ASIDOHL assessment is not required, and instead the assessment of impacts of the proposal in the historic environment chapter of the ES should be carried out using the Welsh Government guidance given in “The Setting of Historic Assets in Wales”.

ID	Reference in Scoping Report	Issue	Comment
Biodiversity			
ID.18		Section 7 list of species and habitats	Please refer to section 9.1 for more information on the changes to the Section 7 list of species and habitats under the Environment (Wales) Act 2016. The Applicant should liaise directly with relevant Planning Authorities and NRW to ensure that the ES accounts for the updated Section 7 list, and that significant effects on all necessary habitats and species are reported in the ES.
ID.19	5.4, Figure 1.1, 2.3.7, 2.3.9, 2.3.15	Survey boundary and full extent of development	PEDW notes NRW's advice that the survey boundary for the Preliminary Ecological Appraisal differs from the red-line site boundary shown in figure 1.1, and the survey boundary appears not to include the access tracks. PEDW also notes that chapter 2 identifies access track upgrades, underground cabling and an overhead grid connection as part of the proposed development. The ES should assess all elements of the proposed development, including turbine locations, access tracks, cable routes, grid connection works, compounds and any other associated infrastructure.
ID.20	2.3.15	Grid connection corridor	PEDW notes RCTCBC's advice that the proposed grid connection route lies within an area of north-west RCTCBC designated as Site of Importance for Nature Conservation (SINC) upland habitat, including peatbog, and that these designated sites are not shown on the grid connection corridor figures. The ES should include baseline ecological mapping and assessment of likely significant effects arising from the grid connection corridor, including effects on SINC, peatland, priority habitats, protected species and ecological connectivity.
ID.21	5.4	Designated sites and Habitats Regulation Assessment (HRA)	PEDW is in agreement with NRW that the identified Special Areas of Conservation (SACs) should be considered through HRA, including Cefn Cribwr

ID	Reference in Scoping Report	Issue	Comment
			Grasslands SAC, Blackmill Woodlands SAC and Limestone Coast of Southwest Wales SAC. The ES should include sufficient information to inform HRA, clearly identifying impact pathways including disturbance, pollution, hydrological change, bat collision risk and effects on commuting and foraging routes.
ID.22	Table 5.14	Bats	PEDW notes NRW's advice that the activity surveys should follow current guidance, including NatureScot guidance and Bat Conservation Trust Good Practice Guidelines. The ES should include species-specific bat activity analysis. Detector locations, seasonal survey data, assessment of turbine collision risk, barrier effects, roost potential, linear commuting features and appropriate bat buffer distances from turbines.
ID.23	Table 5.14	Bat roosts	The SR states that there are potential roost features and NRW advise that within relevant turbine buffers and areas affected by associated works the roost features should be subject to further survey where required. PEDW expects the ES to assess any confirmed roosts and include mitigation or compensation.
ID.24	Table 5.12, Table 5.14	Great Crested Newt	NRW advise that surveys for great crested newt should cover relevant waterbodies within appropriate distances of development works and should follow current guidance. The ES should clarify the survey scope, include presence / absence surveys where it is required, and provide population assessment, impact assessment and mitigation where great crested newt is confirmed.
ID.25	Table 5.14	Water Vole	NRW states that habitat suitable for water vole has been identified within ditches and marshy grassland. The ES should include appropriate water vole surveys,

ID	Reference in Scoping Report	Issue	Comment
			assess impacts where the species is present, and set out mitigation or compensation measures.
ID.26	Table 5.14	Dormouse	NRW notes that there are no known dormouse records on or adjacent to the site and that the Preliminary Ecological Appraisal (PEA) considers dormouse likely absent.
ID.27	Table 5.14	Marsh Fritillary Invertebrates	PEDW draws attention to NRW's comments that Marsh Fritillary has not been included within the protected and notable species proposed for scoping, despite records within 2 km and the presence of potential supporting habitat. PEDW agrees with NRW that Marsh Fritillary and relevant invertebrate surveys should be scoped into the ES, including appropriately timed surveys for Devil's-bit Scabious and evaluation of suitable habitat within the development footprint.
ID.28	5.4, 5.4.30	Cwm Cyffog Site of Special Scientific Interest (SSSI)	PEDW notes NRW's disagreement with the SR's conclusion that Cwm Cyffog SSSI can be excluded from assessment. NRW advises that the SSSI lies approximately 4.7 km southwest of the Northern Array and 1.7 km east of the Southern Array. The Cwm Cyffog SSSI is therefore scoped into the ES to ensure potential impacts are appropriately assessed.
ID.29	5.4.8 – 5.4.11	Baseline Surveys	PEDW notes BCBC's advice that the PEA provides a useful high-level baseline, but that further detailed survey work is required. PEDW also notes the identified limitation that some habitat surveys were undertaken outside the optimal survey season. The ES should clearly set out survey methodologies, survey timing, limitations, confidence in baseline data and any updated surveys undertaken during appropriate seasons.

ID	Reference in Scoping Report	Issue	Comment
ID.30	Table 5.14, Table 5.16	Priority habitats and habitat loss	BCBC advises that the site comprises a mosaic of upland habitats including marshy grassland, acid grassland, heathland and woodland, with several habitats identified as Priority Habitats under section 7 of the Environmental (Wales) Act 2016. The ES should quantify habitat loss and fragmentation, assess effects on habitat condition and connectivity, and demonstrate how the stepwise approach of avoidance, minimisation, mitigation, and compensation has been applied.
ID.31	5.7.10, 5.7.11	Peat and peatland habitats	The SR identifies the potential presence of peat soils within the site. PEDW notes NRW's advice that further information is required to confirm the presence or absence of peat across the whole site, to enable a full assessment of the impacts on peat and peatlands. NRW also advises that further information is required to confirm the presence or absence of peat across the whole site, including the access track. LQAS advise that peatland habitats and peat soils should be identified and assessed in accordance with Planning Policy Wales and relevant Welsh Government guidance. The ES should include appropriate peat survey work, peat depth mapping, confirmatory coring, correlation with vegetation communities and assessment of effects on peat and peatland habitats. Where peat is affected, a Peat Management Plan should be provided.
ID.32	Table 5.14	National Vegetation Classification (NVC) and peatland vegetation	PEDW is in agreement with NRW's comments that Phase 1 habitat survey of the whole site and NVC surveys of semi-natural vegetation should be undertaken, including access track areas.

ID	Reference in Scoping Report	Issue	Comment
			The ES should present the survey results alongside peat depth mapping and should clearly identify Section 7 habitats, wet heath, peatland vegetation, and any habitat mosaics.
ID.33	5.6.32	Hydrology and ecological effects	PEDW notes BCBC and NRW comments regarding wet habitats, peat, watercourses and hydrological sensitivity. The ES should assess ecological effects arising from drainage, water quality changes, flow regime changes, sediment release and downstream effects on aquatic habitats and designated sites. This should be integrated with the Water Environment and Ground Conditions assessments.
ID.34	Table 5.17	Invasive Non-Native Species (INNS)	PEDW draws attention to BCBC's advice regarding INNS, including rhododendron and Himalayan balsam. The ES should identify any INNS present and include appropriate biosecurity, treatment, monitoring and management measures to prevent spread before, during and after construction.
ID.35	Table 5.11	Biodiversity enhancement and net benefit	BCBC has advised that biodiversity enhancement should go beyond standard mitigation and should be secured through an appropriate management plan. PEDW is in agreement with BCBC's advice that the ES should provide a clear and measurable biodiversity enhancement strategy, including long-term management, monitoring and integration with wider ecological networks, including any identified B-line (insect pathways).
ID.36	Table 5.11	Green infrastructure and ecological connectivity	PEDW notes NRW's advice that the development should incorporate robust green infrastructure and avoid narrow or fragmented ecological corridors. The ES should demonstrate how ecological connectivity will be retained and enhanced, including movement corridors for protected species and links to wider ecological networks.

ID	Reference in Scoping Report	Issue	Comment
ID.37	5.4.44 – 5.4.52	Impact assessment and conservation status	PEDW notes NRW's advice that the ES should assess species-specific impacts in the short, medium and long term, including construction, operation and decommissioning phases. Where protected species are confirmed, the ES should demonstrate that the proposal would not be detrimental to the maintenance of favourable conservation status and should include mitigation, compensation, monitoring and long-term management where required.
ID.38	5.4.20, Table 5.14	Protected species	According to BCBC, "The PEA identifies potential for a range of protected and notable species including bats, otter, water vole, hedgehog, brown hare, great crested newt, reptiles and badger. Whilst some of these species are considered absent from the site as a result of survey work, the EIA should include details of further survey works where identified and avoidance measures, as follows: • Full details of proposed survey methodologies and survey effort (in line with current guidance and best practice) • Assessment of impacts (including operational impacts such as turbine collision risk for bats and birds) • Clear avoidance, mitigation and compensation measures."
ID.39	5.4.59 – 5.4.62	Cumulative effects	BCBC advise that cumulative ecological impacts should be assessed in combination with other existing and proposed developments, including other wind farms schemes. The ES should clearly identify the cumulative schemes considered, the ecological receptors affected and whether cumulative effects are likely to be significant.
ID.40		Associated infrastructure and access route	NRW notes that ecological assessment must consider the full development, including access tracks, underground cabling, grid connection infrastructure and associated works. NPTC also notes that where access routes or associated works extend beyond the turbine development area, potential impacts on habitats and protected species along those routes should be assessed.

ID	Reference in Scoping Report	Issue	Comment
ID.41		Rochdale Envelope	Where final turbine locations, access tracks, cable routes, grid connection details, compounds or other infrastructure remain inflexible, PEDW advises that the ES should apply a reasonable worst-case scenario for biodiversity effects. This should include maximum habitat loss, maximum disturbance, maximum peatland impact and worst-case effects on protected species and designated sites.
Ornithology			
ID.42		Section 7 list of species and habitats	Please refer to Section 9.1 for more information on the changes to the Section 7 list of species and habitats under the Environment (Wales) Act 2016. The Applicant should liaise directly with relevant Planning Authorities and NRW to ensure that the ES accounts for the updated Section 7 list, and that significant effects on all necessary habitats and species are reported in the ES.
ID.43	5.5.18 – 5.5.21, Table 5.23	Scope of ornithological surveys	NRW advises that the proposed suite of ornithological surveys is appropriate for the nature of the scheme and welcomes the proposed two years of vantage point surveys. NRW agrees with the overall assessment approach and the ornithological receptors proposed to be scoped in and out. The ES should present the full survey methodology, survey effort and results, and demonstrate that surveys have been undertaken in accordance with current guidance and best practice.
ID.44	5.5.35 – 5.5.36, Table 5.28	Importance of Ornithological receptors	NRW advises that the determination of species and population importance should refer to Wales-specific resources and population estimates, including Birds of Wales / Adar Cymru, UK Rare Breeding Birds Panel publications, County Birds Reports and Welsh Birds Reports.

ID	Reference in Scoping Report	Issue	Comment
			PEDW expects the ES to clearly explain the geographical importance of each receptor and justify the valuation methodology adopted.
ID.45	5.5.29, Table 5.23	Collision risk, displacement and barrier effects	PEDW expects the ES to assess the potential effects of the development on ornithological receptors during construction, operation, and decommissioning, including collision risk, displacement, disturbance, habitat loss and barrier effects where relevant. The assessment should clearly identify significant effects and explain the evidence used to determine significance.
ID.46	5.5.61 – 5.5.62	Mitigation and enhancement measures	NRW advises that details of appropriate mitigation should be provided for any significant effects identified, following the mitigation hierarchy and stepwise approach set out in Planning Policy Wales. Where appropriate, mitigation may include seasonal restrictions on construction activities, habitat management measures, turbine micro-siting or operational measures. The effectiveness of mitigation should be demonstrated within the ES.
ID.47	5.5.59	Cumulative effects	PEDW expects the ES to assess the cumulative effects on ornithological receptors arising from the proposed development in combination with other relevant developments. The assessment should consider cumulative collision risk, displacement and habitat loss where relevant and explain the methodology adopted.
ID.48	5.5.5 – 5.5.12	Habitats supporting bird population	BCBC notes the ecological importance of habitats within and adjacent to the site. The ES should clearly describe habitats used by breeding, wintering, and foraging birds and explain how habitat availability has informed the assessment of ornithological receptors and likely effects.
Water Environment			
ID.49	Table 5.31	Hydrology and Water Quality	PEDW is in agreement with NRW's advice that the proposed development has the potential to affect natural drainage patterns, water quality and watercourses

ID	Reference in Scoping Report	Issue	Comment
			through turbine foundations, cable routes, access tracks, drainage infrastructure and associated excavations. NRW advises that erosion and sediment release may adversely affect the water environment, including downstream receptors, local abstractions and private water supplies. PEDW expects the ES to assess likely significant effects on hydrology, water quality and water-dependent receptors during construction, operation and decommissioning and identify appropriate mitigation measures where necessary.
ID.50	5.6.28	Groundwater and Mining Legacy	The Applicant's attention is drawn to NRW's advice that the site is located within an area with a historic mining legacy and that groundwater conditions may require further investigation. PEDW agrees that the ES should assess likely significant effects on groundwater and hydrogeological conditions and should be informed by appropriate site investigations where required.
ID.51	5.6.31	Wet Habitats and Priority Habitats	Attention is drawn to BCBC's advice that the site includes wet habitats and watercourses which qualify as priority habitats and may be sensitive to changes in drainage, water quality and flow regimes. BCBC advises that hydrological and hydrogeological assessments should be integrated with ecological findings. The ES should therefore assess likely significant effects on water-dependent habitats, aquatic habitats and designated sites arising from changes in hydrology, hydrogeology, and water quality.

ID	Reference in Scoping Report	Issue	Comment
ID.52	5.6.13	Peat and Peat forming Soils	PEDW is in agreement with the advice from BCBC and NPTC that where peat or peat-forming soils are present, the assessment should consider the potential effects of the proposed development on peat hydrology, carbon storage, habitat condition and water quality. PEDW expects the ES to include peat depth surveys where appropriate and identify any necessary peat management and mitigation measures.
ID.53	5.6.32	Downstream Effects	The Applicant's attention is drawn to BCBC's advice that the EIA should assess downstream effects on designated sites and aquatic habitats. NPTC further advises that measures should be identified to prevent sedimentation and pollution of downstream watercourses during construction. The ES should therefore assess likely significant downstream effects on watercourses, aquatic habitats and designated sites and identify appropriate mitigation measures where required.
ID.54	5.6.9	Water Framework Directive	NRW advises that a Water Framework Directive assessment should be undertaken to assess whether any waterbodies could be affected by the proposed development or whether the proposals could result in deterioration of waterbody status. The ES should therefore include a Water Framework Directive assessment where relevant.
ID.55	5.6.19	Flood Risk and Watercourse Crossings	The Applicant's attention is drawn to comments from the lead local flood authority that watercourses within the site are classified as ordinary watercourses and that any crossings or culverting works may require separate consent. PEDW agrees that the ES should assess likely significant effects relating to flood risk, watercourse crossings, and drainage infrastructure and should be informed by a flood risk assessment.

ID	Reference in Scoping Report	Issue	Comment
ID.56	5.6.37	Construction Management and Pollution Prevention	NPTC advises that construction activities, including track formation and drainage works, have the potential to affect hydrology, watercourses, and ground conditions. The ES should identify appropriate construction management, drainage, sediment control and pollution prevention measures to avoid adverse effects on the water environment. Any draft Construction Environmental Management Plan (CEMP) or similar document which contains potential mitigation measures to avoid significant effects should be included as a technical appendix to the ES.
ID.57	5.6.25	Water Infrastructure and Drainage Assets	Dŵr Cymru has advised that the site is crossed by existing water mains, public sewers and lateral drains. Dŵr Cymru advises that these assets should be identified and protected during the construction of the proposed development. The ES should identify any interaction with existing water and sewerage infrastructure and describe any measures proposed to protect those assets.
ID.58	5.6.25	Sustainable Drainage Systems (SuDS)	PEDW notes Dŵr Cymru's advice that the proposed development may require SuDS approval and that surface water drainage proposals should be developed in consultation with the SuDS Approval Body. The ES should describe the proposed drainage strategy, including any SuDS, and assess their effectiveness in managing runoff and maintaining existing drainage. The Applicant should note the information in Section 9.4 of this Direction.
ID.59	Table 5.31, 5.6.27	Decommissioning	PEDW is in agreement with NRW's advice that decommissioning should not be assumed to be construction in reverse. NRW advises that the nature, extent and duration of decommissioning activities should be considered, including any infrastructure proposed to remain in situ. The ES should therefore assess likely significant effects arising from decommissioning on hydrology, groundwater and water quality.

ID	Reference in Scoping Report	Issue	Comment
Ground Conditions			
ID.60	5.7.11, Table 5-34	Peat, peat soils and peatland habitats	NPTC highlight that where peat or peat-forming soils are present, it is expected that the assessment will include appropriate peat depth surveys and where necessary a peat management strategy. NRW and LQAS advise that further information is required to confirm the presence or absence of peat across the site, to enable a full assessment of the impacts of peat and peatlands. NRW also notes that the access track has not been assessed with regards to peat. LQAS and NRW welcome that the Peatland of Wales map has been used at the first instance but require a Phase 1 peat survey is undertaken conducted across a 100 m grid and supported by confirmatory coring. Peat data should be mapped with site location, interpolated peat depth (extended into survey area), probing location and cores/auger (to confirm the probing is reliable), before it can be confirmed if a phase 2 peat survey is required. NRW adds that if peat is present on site, it is requested that a Peat Management Plan is provided. The Applicant should refer to NRW and LQAS's responses in Appendix 1, for detailed comments on peat and requirements for surveys and assessments. NRW request that Phase 1 habitat survey of the whole site and NVC surveys of semi-natural vegetation are presented alongside peat depth mapping to present a full understanding of the impacts on peat and peatland habitat.
ID.61		Soil Management Scheme (SMS)	LQAS advises that a soil management scheme should be prepared by the developer, informed by a baseline soil resources and physical characteristics report, and be considered as part of the ES process. This should be a clear

ID	Reference in Scoping Report	Issue	Comment
			scheme and programme setting out how all soils and their functions will be conserved during construction, reinstated and at decommissioning. The Applicant should refer to LQAS response in Appendix 1 for further information regarding requirements for the SMS.
ID.62	5.7.12	Agricultural Land Classification (ALC)	LQAS confirm that no Best and Most Versatile Agricultural (BMV) Land is present on site and therefore can be scoped out of the assessment. LQAS adds that detailed ALC field survey is not requested, but may be beneficial in supporting baseline soil resources and physical characteristics information for the site.
Traffic and Transport			
ID.63	5.8.21 – 5.8.23	Construction Traffic and Access Routes	BCBC advises that the number of construction vehicle movements and the routes to the site are not yet known and therefore further assessment may be required once access routes are confirmed. NPTC advises that the transport assessment should clearly identify the proposed construction access routes and the extent to which highway networks within neighbouring authority areas may be utilised. PEDW agrees that the ES should assess the likely significant effects of construction traffic, including construction access routes, traffic volumes, vehicle types and associated impacts on highway users and the local communities.
ID.64	5.8.26	Highway Safety and Junction Capacity	BCBC advises that additional assessment may be required once construction routes are known, particularly where routes utilise roads with active travel infrastructure or locations where highway safety and junction sensitivity concerns exist. PEDW agrees that the ES should assess potential effects on

ID	Reference in Scoping Report	Issue	Comment
			highway safety, junction operation and road network capacity where likely significant effects may arise.
ID.65	5.8.13	Active Travel Cycling Infrastructure	BCBC states that local cycle routes should be identified using Welsh Government DataMapWales and that engagement with the local authority is required to ensure existing and proposed active travel routes are correctly represented. PEDW agrees that the ES should assess potential impacts on active travel infrastructure and users where construction traffic, abnormal loads or highway works may affect these routes.
ID.66	5.8.16	Public Rights of Way (PRoW)	BCBC is of the opinion that several public footpaths, bridleways and claimed rights of way cross the site and that development should minimise impacts on the PRoW network in accordance with Policy PLA9. NPTC advises that extensive recreational routes connect across local authority boundaries and may be affected by the proposed development. PEDW agrees that the ES should assess likely significant effects on PRoW. It should also assess direct impacts, temporary diversions, closures, accessibility, safety and user experience during construction, operation and decommissioning. The ES should also assess likely significant effects on recreational receptors using PRoW.
ID.67	5.8	Cross-Boundary Transport Effects	NPTC advises that construction traffic may utilise routes within Neath Port Talbot County Borough and surrounding communities. The authority advises that cross-boundary effects on highway safety, traffic flows and local amenity should be assessed. PEDW agrees that the assessment should consider cross-boundary transport effects where traffic associated with the development is likely to affect neighbouring authority areas.

ID	Reference in Scoping Report	Issue	Comment
ID.68	5.8.24, 5.8.7 – 5.8.8	Abnormal Indivisible Loads (AILs) / Strategic Road Network (SRN)	The Welsh Government Transport Directorate advises that the Applicant should demonstrate that transport of AILs from the SRN to the site is achievable and should provide details of vehicle dimensions, weights, route constraints and swept-path analysis. Transport Directorate also advises that access arrangements for abnormal loads should minimise impacts on the safety and free flow of traffic on the Strategic Road Network. RCTCBC also advises that abnormal load movements should be addressed through a Traffic Management Plan. PEDW agrees that the ES should assess the likely significant effects associated with abnormal load deliveries. Likely significant effects on the SRN should be assessed where the development relies upon SRN infrastructure during construction, operation or decommissioning.
ID.69	5.8.24	Traffic Management Plan	RCTCBC and Transport Directorate advise that a Traffic Management Plan should be prepared to manage construction network traffic and abnormal load deliveries. Matters identified include convoy arrangements, passing places, holding areas, contingency planning, temporary traffic management measures and stakeholder engagement. PEDW expects that sufficient information should be provided within the ES to demonstrate how construction traffic and abnormal load deliveries will be managed and mitigated.
ID.70	5.8	Highway Improvements and Temporary Works	RCTCBC and Transport Directorate advise that highway improvements, passing places, layover areas, geometric changes and other temporary highway works may be required to facilitate construction traffic and abnormal load deliveries. The ES should identify and assess likely significant effects associated with any proposed highway modifications and associated mitigation measures.

ID	Reference in Scoping Report	Issue	Comment
ID.71	Table 5.47, 5.8.27	Road Safety Audit	Transport Directorate advises that a Road Safety Audit should be undertaken in accordance with DMRB GG119.
ID.72	5.8	Structural Capacity of Highway Assets	Transport Directorate advises that structures along routes used by construction traffic and abnormal loads, including bridges, culverts, retaining walls and embankments, should be assessed to determine their suitability and any strengthening requirements. PEDW's position is that the likely significant effects of development related traffic on highway structures should be assessed in the ES.
ID.73	5.8	Highway Condition and Damage	Transport Directorate advises that condition survey should be undertaken before, during and after construction and that mechanisms should be identified for the remediation of any damage attributable to development traffic. PEDW expects that the ES should identify any likely significant effects on highway infrastructure arising from construction activities and outline appropriate mitigation measures.
ID.74	5.8	Cumulative Traffic Effects	BCBC advises that committed developments likely to be completed during the construction phase should be considered once construction routes are confirmed. RCTCBC also advises that cumulative impacts arising from other abnormal load-generating developments using the same routes should be considered. PEDW expects the that the ES assesses cumulative traffic and transport effects where there is potential for significant cumulative impacts.

ID	Reference in Scoping Report	Issue	Comment
Noise			
ID.75	5.9.1 – 5.9.2	Aspects Scoped in and out	BCBC's Environmental Health Officer states that; 'I have reviewed the scoping opinion report for the above windfarm and am in agreement with what the Applicant proposes to scope in and out of the EIA with respect to noise and shadow flicker.' PEDW is in agreement with BCBC.
ID.76	Table 5.49, 5.9.39	Cumulative Assessment	The BCBC Environmental Health Officer states that 'with respect to the cumulative assessment, this must be based on the consented levels for both existing wind farms and wind farms which have been granted planning (even if they are not yet operational) and not just the noise emission levels provided by the manufacturer as the existing/consented turbines can operate right up to their consented limits.'
Shadow Flicker			
ID.77	5.10.10 – 5.10.15		PEDW welcomes that shadow flicker is scoped into the ES. Please note the comments regarding Shadow Flicker in Section 6 of this Direction.
Socioeconomics			
ID.78	5.10.16 – 5.10.19		PEDW agrees with the approach set out in the SR. The Applicant is advised to liaise directly with the relevant local authorities to agree on the local active businesses, communities and recreational and tourism organisations that should be considered in the assessment.
Aviation and Telecommunications			

ID	Reference in Scoping Report	Issue	Comment
ID.79	5.10.6 & 5.10.7	Physical obstruction to aircraft and safety lighting	Both the SR and the MOD highlight that the proposal will introduce physical obstructions to the airspace. The MOD state this may potentially impact low flying aircraft operating within the area. The MOD is in agreement with paragraph 5.10.7 of the SR that the turbines should be fitted with aviation safety lighting but add that sufficient data should be submitted to ensure that structures can be accurately charted to allow deconfliction. The MOD highlight that since the proposal includes wind turbines that exceed a height of 150 m above ground level they are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. The MOD state that along with Civil Aviation Authority requirements, they will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited safety lighting. PEDW is in agreement that the MOD and NATS should be consulted if any alterations or amendments to the form and placement of the turbines occur.
ID.80	5.10.6 – 5.10.9	Technical and Operational Assessment (TOPA)	The Applicant's attention is drawn to Cardiff Airport's comments that the proposal may impact the radar and air traffic service operations at Cardiff Airport and the control operations of NATS. Cardiff Airport recommends the Applicant arrange for a Preplanning Technical and Operational Assessment (TOPA) to confirm whether the proposal will have an impact. Cardiff Airport provide the following link to the NATS website for details of how the Applicant can request a TOPA assessment: https://www.nats.aero/our-solutions/wind-farms/n/wind-farm-pre-planning-assessment/

ID	Reference in Scoping Report	Issue	Comment
			Depending on the results of the TOPA, further consultation with Cardiff Airport and NATS is necessary if the proposal will impact radar, air traffic, and control operations.
Population and Human Health Effects			
ID.81	5.10.20 – 5.10.21	Scope	The SR proposes that population and human health effects are addressed through the relevant technical assessments rather than within a standalone chapter. PEDW agrees that population and human health effects may appropriately be assessed through the relevant technical chapters, including Traffic and Transport, Noise, Shadow Flicker, Socioeconomics, Landscape and Visual Effects, and Major Accidents and Disasters. PEDW therefore advises that the ES should clearly identify and assess any likely significant effects on population and human health arising from the proposed development during construction, operation and decommissioning. PEDW advises that a clear summary of population and human health effects should be provided within the ES, drawing together the findings of the relevant technical assessments to demonstrate whether any significant effects on population and human health are likely to occur and how these would be avoided, reduced or mitigated.
ID.82		Firefighting water supply and emergency response capacity	Attention is drawn to the advice of The South Wales Fire and Rescue and Mid and West Wales Fire and Rescue Service that adequate water supplies and access arrangements should be available to support firefighting operations. The Fire and Rescue Service advises that consultation should take place at an early stage to ensure that emergency response requirements are appropriately

ID	Reference in Scoping Report	Issue	Comment
			considered and that sufficient water supply infrastructure is available where required.
Climate Change			
ID.83	5.10.22 – 5.10.24	Climate change	PEDW notes the proposed approach to address climate change through relevant environmental topic chapters rather than through standalone chapter of the ES. This approach is acceptable. However, the ES should demonstrate how climate change considerations have informed the design and assessment of the proposed development, including greenhouse gas emissions, carbon balance, peat-related carbon effects, adaptation to future climate conditions and resilience to climate related risks. Climate change is therefore scoped into the ES through relevant topic chapters and supporting assessments but does not require a standalone ES chapter.
Major Accidents and Disasters			
ID.84	5.10.30- 5.10.31 Table 5-53		PEDW welcomes the proposal to scope Major Accidents and Disasters into the ES and agrees with the approach set out in the SR. As stated in ID 82, The South Wales Fire and Rescue and Mid and West Wales Fire and Rescue Service highlight the need to provide adequate water supplies and vehicle access for firefighting purposes and draws the Applicant's attention to guidance on this matter. The ES should ensure that risks of accidents are accounted for and mitigated against and a proportionate section on this aspect should be included in the ES. Any relevant documents where mitigation measures are relied upon should be provided as technical appendices to the ES.

ID	Reference in Scoping Report	Issue	Comment
Other Considerations			
ID.85		Air Quality	PEDW has concerns that the construction phase of the proposal could generate air pollution and dust with potential associated health effects. PEDW advises air quality is addressed in a proportionate manner in the Traffic and Transport chapter, and where relevant, the Biodiversity chapter. If necessary, air quality should be addressed in the CEMP as a technical appendix to the ES. Air quality is therefore scoped into the ES, although not necessarily as a standalone chapter.
ID.86		Material Assets and Waste	It will be necessary to address Material Assets and Waste in a proportionate manner in relevant chapters, especially given the requirement to address the decommissioning phase in the ES. The draft CEMP should also be included as a technical appendix to the ES. Material Assets and Waste is therefore scoped into the ES, although not necessarily as a standalone chapter.

9. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

9.1 Revised Section 7 list of species and habitats

A Dear CPO letter was published on 1 April 2026 notifying of a revised Section 7 list of species and habitats under the Environment (Wales) Act 2016: <https://www.gov.wales/revised-section-7-list-species-and-habitats-under-environment-wales-act-2026>

The revised Section 7 list is available here: <https://www.gov.wales/section-7-list-species-and-habitats-principal-importance-wales>

Background information is available here: <https://www.gov.wales/section-7-habitats-and-species-principal-importance-maintaining-and-enhancing...>

The new list includes different definitions of habitats, making comparisons difficult, but the number of protected species has increased (e.g. vascular plants +232, 300% increase; invertebrates +277, 147% increase; birds +88, 173% increase; fungi +79, 293% increase; marine species +16, 29% increase).

Applicants should liaise directly with relevant Planning Authorities and NRW to ensure that the ES accounts for the updated Section 7 list, and that significant effects on all necessary habitats and species are reported in the ES.

9.2 Updated Guidance from the Design Commission for Wales

On 23 November 2023 the Design Commission for Wales published their updated guidance “Designing for Renewable Energy in Wales”. The guidance is available online: <https://www.gov.wales/designing-renewable-energy-wales>

9.3 Habitats Regulation Assessment

The Conservation of Habitats and Species Regulations 2017 require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant’s responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, Applicants should ensure that their rationale is consistent with the CJEU finding (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CN0323>) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required (‘screening’). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis

of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – Advice on Habitats Regulations Assessments may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>

9.4 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the Applicant contact the local SuDS Approval Body early on.

In accordance with paragraph 7.6 of Technical Advice Note (TAN) 15: development, flooding and coastal erosion, applications submitted after 31 March 2025 where planning permission is being sought before SAB approval should be accompanied by a Drainage Statement. Figure 3 of TAN 15 sets out the required contents of a Drainage Statement.

Appendix 1: Consultation Responses

Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr Bridgend County Borough Council



Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont, CF31 4WB / Civic Offices, Angel Street, Bridgend, CF31 4WB

Robert Sparey
PEDW
Crown Buildings
Cathays Park
CARDIFF CF10 3NQ
PEDW.Infrastructure@gov.wales

Grwp Datblygu / Development Group
Ebost / Email: planning@bridgend.gov.uk
Gofynnwch am / Ask for: Dion Douglas
Deialu Uniongyrchol / Direct Line: **01656 643285**
Ein cyf / Our ref: **P/25/745/DNS**

Dyddiad / Date: **8 May 2026**

Dear Robert,

Town and Country Planning Act 1990

The Developments of National Significance (Procedure) (Wales) Order 2016 (As Amended)
Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Project Name: DNS CAS-04687-J2G4Q0 - Glanllynfi Garth Wind Farm – Scoping Consultation

I refer to your request for advice on the scope of the EIA and the proposed methodologies outlined in the EIA Scoping Report, in relation to the authority's functions in order to inform your Scoping Direction.

The purpose of the scoping report is to define the environmental effects which will need to be assessed as part of the EIA, to establish the availability of baseline data, to define a survey and assessment framework for the EIA, and to allow the relevant parties to comment on the proposed methodology for each topic to be considered, and to provide any relevant environmental information relating to the project and the surrounding area.

The submitted EIA Scoping Report has been reviewed.

RELEVANT PLANNING HISTORY

P/25/43/FUL - Land at Cynhordy 1.6km east of Maesteg and 2km west of Pont-y-Rhyl. The installation of a 90m high anemometer mast for a temporary period of up to three years. Granted 02/10/2025

P/25/41/FUL - Land at Pwll Yr Lwrch (1.7km to east of Maesteg and 3km west of Blaengarw) Maesteg. The installation of a 90m high anemometer mast for a temporary period of up to three years. Granted 02/10/2026

Ffôn/Tel: 01656 643643

Facs/Fax: 01656 668126

Ebost/Email: talktous@bridgend.gov.uk

Negeseuon SMS/ SMS Messaging: 07581 157014

[Twitter@bridgendCBC](https://twitter.com/bridgendCBC)

Gwefan/Website: www.bridgend.gov.uk

Cyfnewid testun: Rhwch 18001 o flaen unrhyw un o'n rhifau ffon ar gyfer y gwasanaeth trosglwyddo testun

Text relay: Put 18001 before any of our phone numbers for the text relay service

Rydym yn croesawu gohebiaeth yn Gymraeg. Rhwch wybod i ni os mai Cymraeg yw eich dewis iaith

We welcome correspondence in Welsh. Please let us know if your language choice is Welsh

PUBLICITY

No publicity is undertaken in connection with requests for a 'Scoping Opinion'. However, internal consultations with our statutory consultees has been undertaken.

APPRAISAL AND ADVICE

The submitted scoping report provides a general overview of the project and its location, but it is noted that the scheme is likely to evolve through the EIA process.

The portions of the development site which is located within the Bridgend County Borough are located outside any settlement boundary as defined by Policy SF1: Settlement Hierarchy and Urban Management of the Replacement Local Development Plan (RLDP) adopted in 2024 and, therefore, located in the countryside where Policy DNP1 Development in the Countryside of the RLDP sets a presumption against development in the countryside, except where it is for:

- 1) Agriculture and/or forestry purposes;
- 2) The winning and working of minerals;
- 3) Appropriate rural enterprises where a countryside location is necessary for the development;
- 4) The implementation of an appropriate rural enterprise/farm diversification project;
- 5) The expansion of an existing business (subject to other relevant policies in the plan);
- 6) Land reclamation purposes;
- 7) Transportation and/or utilities infrastructure to enable implementation of LDP allocations;
- 8) **Renewable energy projects;**
- 9) Affordable housing to meet locally identified need in accordance with COM5;
- 10) The suitable conversion of, and limited extension to, existing structurally sound rural buildings where the development is modest in scale and clearly subordinate to the original structure;
- 11) The direct replacement of an existing dwelling;
- 12) Outdoor recreational and sporting activities;
- 13) The provision of Gypsy, Traveller and Showperson sites in accordance with COM8; or
- 14) Education provision where a need has been identified by the Local Education Authority.

Countryside development must be of a sustainable form with prudent management of natural resources and respect for the cultural heritage of the area.

Policy DNP1 of the RLDP seeks to protect the integrity and openness of the countryside and prevent inappropriate forms of development. The proposed development is to construct and operate a wind farm of up to eight turbines and associated infrastructure including access tracks, transformer, substation and connection via overhead. **Criterion 8 identifies renewable energy projects as an appropriate exception.**

Policy SP13: Renewable and Low Carbon Energy Development of the RLDP states that renewable and low carbon development proposals which contribute to meeting national and local renewable and low carbon energy and energy efficiency targets will be permitted where it satisfies the following criteria:

- a) It can be demonstrated that there will be no unacceptable impacts on the natural and historic environment or local communities (such as noise and air pollution) and that no other unacceptable cumulative impacts will arise;

- b) The proposal (inclusive of its associated infrastructure) has sought to minimise the landscape and visual impact through its design and micro-siting, particularly where in close proximity to homes and tourism receptors;
- c) Proposals make provision for the appropriate restoration and after-care of the land for its beneficial future re-use;
- d) The proposal can facilitate a connection to the grid network;
- e) There would not be an unacceptable impact on access and highway safety; and
- f) There would not be unacceptable impact on the amenity of residential properties or tourist accommodation.

The site as a whole is located outside any Local Search Area identified under Policy SP13.

The majority of the site within the Bridgend County Borough boundary lies within Pre-Assessed Area 9 (Future Wales 2040), with a smaller portion located outside this designation (west and south). For those areas within Pre-Assessed Area 9, landscape considerations have already been taken into account in Future Wales and Criteria 1(b) should not apply.

However, the portions of the site located outside the Pre-Assessed Area should be assessed against Criteria 1(b) to assess the impact on the landscape. In addition, the proposal must also be demonstrated to comply with Criteria 1a), 1c) 1d), 1e) and 1f), as outlined above.

OBSERVATIONS

Bridgend County Borough Council requests that the following observations in respect of the key topic areas be considered in PEDWs review of the EIA Scoping Report:

The submitted scoping report includes details of what the developers consider should be included within an Environmental Statement (ES). This includes:

- Landscape and visual impact assessment
- Historic Environment
- Biodiversity
- Ornithology
- Ground Conditions
- Traffic and Transport
- Noise

The responses from our statutory consultees have highlighted the topics which should be included within an ES, and in general they follow the topics suggested in the scoping report. Relevant responses are included under each topic heading below.

Landscape and Visual Impact Assessment

With respect to the issue of 'landscape character', the County Borough has been subject to a Landscape Character Assessment, the results of which have been used to inform 'SPG 20: Renewables in the Landscape' which considers the impact of different scales of wind and solar developments in the landscape of the County Borough.

The proposal is located within Landscape Character Area (LCA) 3: Llynfi & Garw Uplands and Forestry the key landscape characteristics of which are defined as:

- Strongly rolling upland landscape with steep slopes and rounded hill summits, reaching a maximum of 556 metres AOD at Mynydd Caerau.
- High land underlain by Upper Coal Measures with complex dip characteristics, forming distinctive rounded hill summits. Upper slopes draining into the Llynfi Valley comprise frequently bedded Middle Coal Measures, with some deposits of glacial boulder clay.
- Functions as a water catchment for the adjacent Llynfi and Garw valleys, with many fast-flowing tributaries and waterfalls carving through the landscape to meet the rivers below.
- Extensive tracts of mature larch and Norway spruce forestry on hill summits and slopes (including Garw Forest), forming prominent geometric blocks.
- Bands of semi-natural broadleaved woodland along streams (oak, ash and birch dominated) and field boundaries, with wind-sculpted, stunted oaks featuring on lower slopes.
- Apart from forestry, the main land use is rough moorland sheep grazing, with enclosed semi-improved pastures on lower slopes with areas of purple moor grass/ rush pasture.
- Large enclosures marked by fencing or lines of wind-sculpted trees.
- Valued habitats include patches of broadleaved semi-natural woodland, marshy grassland, bog, scrub, bracken, acid grassland and heathland, with a number of locally designated SINC's.
- Disused spoil tips, mines and quarries on hillsides are evidence of the area's industrial past.
- Prehistoric round cairns crown hill summits, including a nationally important cluster on Mynydd Caerau and further examples within Garw Forest. The remains of a medieval platform house are also found on Garth Hill.
- Very sparse settlement limited to a handful of scattered farmsteads on lower slopes.
- The town of Maesteg lies to the west of the LCA within the Llynfi Valley, with the only road access into the landscape from the town terminating at the entrance to a former coal mining area below the Garw Forest.
- A large proportion of the forest is open access land, accessible by forestry access tracks and public footpaths/bridleways. There is also a significant area of open access land at Mynydd Bach.
- A strong sense of remoteness and bleakness, particularly in adverse weather conditions.
- Expansive, panoramic views across the county borough and beyond (Brecon Beacons to the north, Bristol Channel and Somerset to the south).
- Lower slopes have strong visual connections with the adjacent Llynfi and Garw valleys and their associated settlements.

Based on these landscape characteristics, the landscape sensitivity assessment contained in SPG 20 notes that while this is a large-scale landscape, it is likely to be highly sensitive 'very large' clusters of wind turbines, which would remain out of scale with the underlying landform. The assessment notes that in cumulative terms the development could be highly sensitive with respect to the number of turbines and also highly sensitive in respect of their height. However, it's relevant to note that landscape considerations have already been taken into account in Future Wales with regards to the areas of the site within Pre-Assessed Area 9.

Historic Environment

Policy SP18 of the RLDP states that development proposals must protect, conserve and where appropriate, preserve and enhance the significance of historic assets including their settings.

Development proposals will only be permitted if it preserves or enhances the character of the area. The LPA is generally satisfied that the scheme as highlighted in section 5.3 of the report should not be detrimental to historic assets in line with the proposed methodology.

Biodiversity and Ornithology

The site is located within and adjacent to a number of Sites of Importance for Nature Conservation (SINC) (Nant-y-Fforest, Craig Ddw & Gellihebyg). Policy DNP5 of the RLDP states that development within a SINC must be compatible with the nature conservation or scientific interest of the area, whilst promoting their educational role. Developments which would have an adverse impact on these sites will not be permitted unless the benefits associated with the development can be demonstrated to outweigh the harm and/or the harm can be reduced or removed by appropriate mitigation and/or compensation measures.

Council's Biodiversity Policy Manager has reviewed the reports submitted and provides the following comments:

'Based on the Preliminary Ecological Appraisal (PEA) submitted in support of the scoping request, it is acknowledged that the proposed development is located within a landscape of ecological value, comprising a mosaic of upland habitats including marshy grassland, acid grassland, heathland and areas of woodland, with several habitats identified as Priority Habitats under Section 7 of the Environment (Wales) Act 2016.

The PEA identifies a number of statutory and non-statutory designated sites within the surrounding area, including SACs, SSSIs and a substantial number of SINC's, as well as the presence of a B-Line across the site, indicating its importance for pollinator connectivity.

While the PEA provides a useful high-level baseline, the following matters should be scoped into the Environmental Impact Assessment (EIA).

Designated sites and Habitats Regulations Assessment (HRA)

The EIA should include sufficient information to inform a Habitats Regulations Assessment, including consideration of potential Likely Significant Effects on SACs, particularly those designated for protected or notable species (e.g. bats, marsh fritillary etc.) and hydrologically sensitive habitats, in the form of a Shadow HRA. Pathways for impact (e.g. collision risk, disturbance, hydrological changes, pollution, and impacts on various species commuting/foraging routes) should be clearly defined and assessed.

Priority habitats and habitat loss / fragmentation

Given the extent of Priority Habitats within the site (including marshy grassland, upland heathland, and woodland), the EIA should:

- Quantify habitat loss and fragmentation as a result of the development
- Assess impacts on habitat condition and connectivity within the site and the wider landscape
- Clearly demonstrate how the step-wise approach (avoidance, minimisation, mitigation, compensation) has been applied

Particular attention should be given to the presence of marshy grassland and heathland mosaics, which are likely to be sensitive to hydrological change and construction disturbance.

Hydrology

The site includes wet habitats and watercourses that qualify as Priority Habitats. The EIA should therefore include a robust assessment of:

- Potential impacts on hydrology (including drainage, water quality and flow regimes)
- Effects on peat (where present), including carbon loss and habitat degradation and how this will be avoided
- Downstream impacts on designated sites and aquatic habitats

This should be supported by appropriate hydrological and hydrogeological assessments and integrated with ecological findings, as well as appropriate application of the step-wise approach to these Priority Habitats.

Protected and notable species

The PEA identifies potential for a range of protected and notable species including bats, otter, water vole, hedgehog, brown hare, great crested newt, reptiles and badger. Whilst some of these species are considered absent from the site as a result of survey work, the EIA should include details of further survey work where identified and avoidance measures, as follows:

- Full details of proposed survey methodologies and survey effort (in line with current guidance and best practice)
- Assessment of impacts (including operational impacts such as turbine collision risk for bats and birds)
- Clear avoidance, mitigation and compensation measures

In particular:

- Bats: surveys should address both roosting and activity, including assessment of collision risk and barrier effects
- Otter and water vole: surveys should consider watercourse crossings and hydrological changes within the site and to the wider landscape
- Great crested newt: clarification is required on survey scope given the presence of waterbodies within and adjacent to the site
- Reptiles and other fauna: appropriate presence/likely absence surveys and mitigation strategies should be included, particularly in relation to those that are designated features of wider sites, such as marsh fritillary butterflies

Ornithology

It is noted that ornithological surveys are being reported separately. Given the nature of the development, ornithology should form a key component of the EIA, including:

- Baseline survey data covering an appropriate temporal scope
- Collision risk modelling

- *Assessment of displacement and disturbance effects*
- *Assessment of increased predation or other behaviour opportunities afforded by the development*
- *Consideration of cumulative impacts with other wind farm developments in the wider area*

Survey limitations and seasonality

The PEA identifies that habitat surveys were undertaken outside the optimal survey season.

The EIA should therefore:

- *Address any limitations arising from this*
- *Ensure that all necessary surveys are updated and completed during appropriate seasons*
- *Clearly set out confidence in baseline data*

Invasive Non-Native Species (INNS)

The presence of invasive species (rhododendron and Himalayan balsam) should be addressed through:

- *A detailed INNS management plan to include a suitable period of monitoring post treatment*
- *Biosecurity measures to prevent spread before, during, and after construction*

Biodiversity enhancement and net benefit

The EIA should demonstrate how the development will deliver biodiversity enhancement in line with the Section 6 Duty and Planning Policy Wales. This should include:

- *A clear, measurable enhancement strategy appropriate for the site and habitats and species present*
- *Long-term management and monitoring proposals*
- *Integration with wider ecological networks (including the identified B-Line)*

Enhancement measures should go beyond standard mitigation and be secured through an appropriate management plan.

Cumulative effects

The EIA should assess cumulative ecological impacts in combination with other existing and proposed developments in the area, including other wind farm schemes.

In summary, while the PEA provides an initial understanding of ecological constraints, the EIA will need to provide a significantly more detailed evidence base, including robust survey data, impact assessment and clearly defined avoidance, mitigation and enhancement measures. At this stage, it is important that the scope of the EIA is sufficiently broad to capture all potential ecological effects, particularly in relation to Priority Habitats, protected and notable species, hydrology and ornithology.'

Ground Conditions

The site is located within a Category 1 and 2 Sandstone Mineral Safeguarding Zones as defined by Policy ENT12 of the RLDP. Development proposals within mineral safeguarding zones, either permanent or temporary, will need to demonstrate that:

- 1) *If permanent development, the mineral can be extracted prior to the development, and/or the mineral is present in such limited quantity or quality to make extraction of no or little value as a finite resource; and*

- 2) In the case of residential development, the scale and location of the development e.g. limited infill/house extensions, would have no significant impact on the possible working of the resource; and
- 3) In the case of temporary development, it can be implemented, and the site restored within the timescale the mineral is likely to be required.

Traffic and Transport

The Council's Principal Highways Development Control Officer has assessed the submitted scoping report and notes:

'Chapter 5.8 discusses the Traffic & Transport issues.

Table 5.45 indicates that public transport bus information has been sourced from First bus timetables. It is advised that this may be suitable in respect of this single operator but would not give an accurate reflection of all services. Use of Traveline Cymru will identify services conducted by other operators. This would also identify bus stops which are not served by any services at all.

Furthermore table 5.45 identifies Walk Wheel Cycle Trust (formerly Sustrans) as the source for cycle routes. Whilst this source is acceptable for National routes identifying the localised routes, both existing and proposed, is important and this should be sourced from the Welsh Government "Data Maps Wales" website. As such Figure 5.6 (appendix A) should be updated with any existing local cycle routes (or any proposed which are likely to be completed prior or during the construction period). Engagement with BCBC is essential to determine this.

Notwithstanding it is appreciated that the development would generate a minimal quantum of movements to / from the site during the operational phase (circa 30 years) limited to maintenance visits. The construction phase is the time when the peak number of movements and large vehicles will be generated

It is understood that the number of movements and the routes to the site are not currently known and these will need to be considered further by BCBC when available. Further information in respect of Construction Traffic Management Plan and abnormal loads will also need to feature in future submissions.

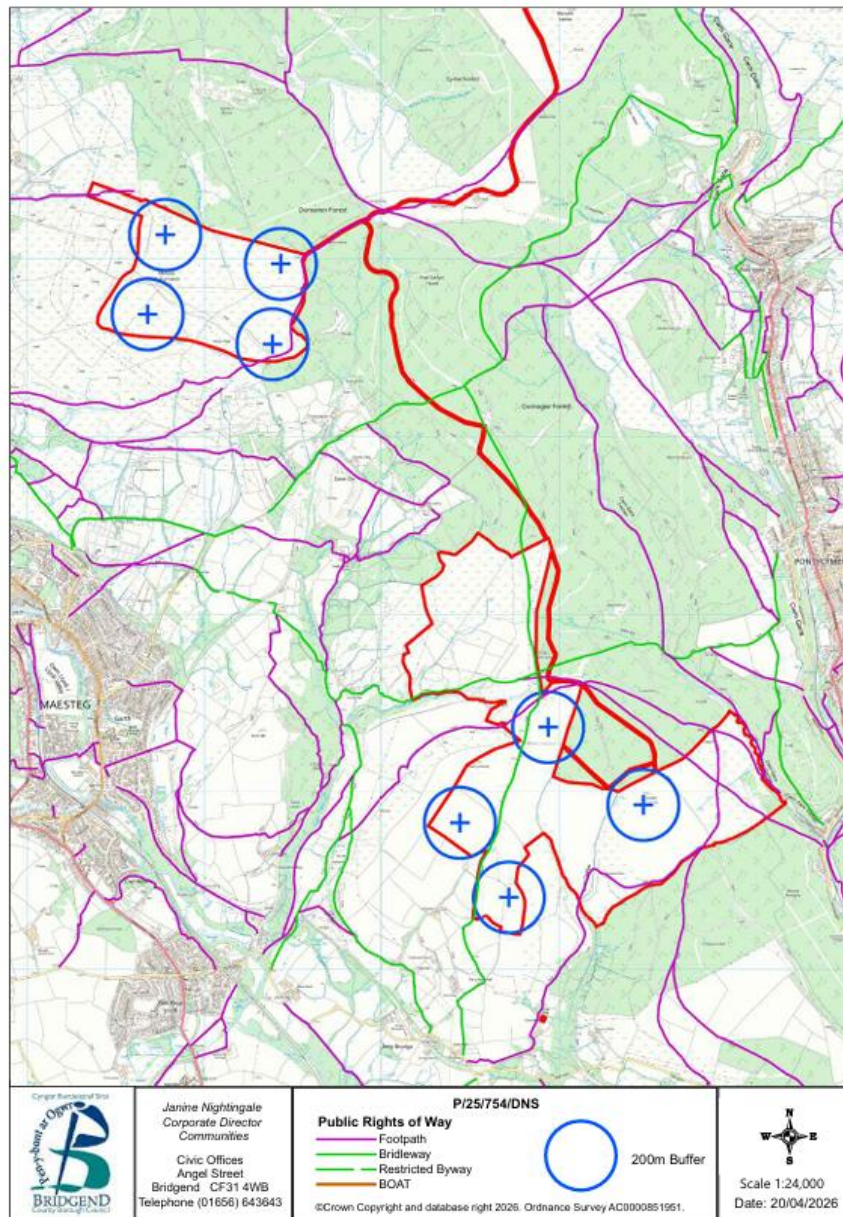
The proposed assessment methodology outlined in paras. 5.8.29-5.8.31 is noted however the Highway Authority would reserve the right for further assessments to be requested once the proposed access routes are known. These requested would be based on use of highways where on- road cycling Active Travel routes are in place (or will be completed prior to the commencement of construction) and where Highway safety and, junction sensitivity concerns exist.

In addition, the developer should take into account any committed development which is likely to be completed prior to the commencement of construction, or during the construction period. Committed developments which need to be assessed can only be considered once the construction routes are known.'

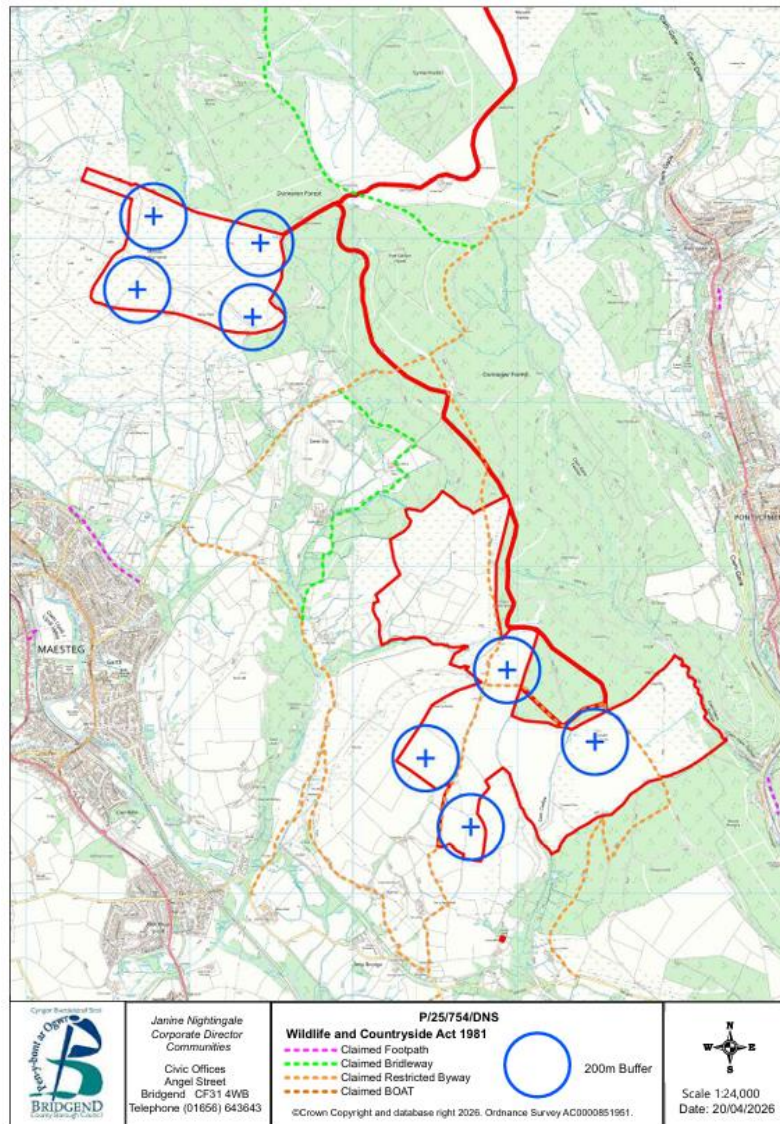
Council's Rights of Way and Land Access Officer has advised; *'Having consulted the Network Map, (which is a working copy of the Definitive Map and Statement incorporating any further amendments as a result of legal orders since the relevant date of 30th December 2004), I must advise that the Public*

Rights of Way (PRoW) Footpaths 28, 29, 36 & 37 Garw Valley, 3, 4, & 59 Maesteg and Bridleways 30 & 45 Garw Valley, 28 & 71 Maesteg cross the site of the proposed development.

Please find attached a plan showing the indicative locations of the turbines with 200 metre buffers to illustrate where turbines are located in close proximity to the various Public Rights of Way across the site.



It is noted that plans included in the consultation documents indicate where the public rights of way are within the site. However, the site of the proposed development is also crossed by the Claimed Rights of Way registered under application references A763/1/234, A763/1/235 A763/1/236, A763/1/289. The alignment of the claimed rights of way are shown on the second attached plan.'



Policy PLA9: Development Affecting Public Rights of Way of the RLDP states that development must link with and seek to minimise impacts on the PRow network. Any predicted adverse impacts on the character, safety, enjoyment and convenient use of a PRow must be mitigated.

Noise

Council's Environmental Health Officer has considered the documents submitted and has advised:

'I have reviewed the scoping opinion report for the above windfarm and am in agreement with what the applicant proposes to scope in and out of the EIA with respect to noise and shadow flicker. However, I would just re-iterate that with respect to the cumulative assessment, this must be based on the consented levels for both existing wind farms and wind farms which have been granted planning (even if they are not yet operational) and not just the noise emission levels provided by the manufacturer as the existing/consented turbines can operate right up to their consented limits.'

I trust that the above advice on the scope of the EIA and the proposed methodologies outlined in the EIA Scoping Report is of assistance,

Yours sincerely



STEVEN JENKINS
TEAM LEADER DEVELOPMENT CONTROL

THE VALE OF GLAMORGAN COUNCIL

Civic Offices, Holton Road, Barry. CF63 4RU

Telephone number: (01446) 704656

My Ref.
2026/00178/OBS

When telephoning please ask for:
Administration

Adeilad y Goron,
Parc Cathays,
Caerdydd,
CF10 3NQ

12 March 2026

Dear Sir/Madam,

Location : Glanllynfi Garth Wind Farm, Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl

Proposal : The proposed Development is to construct and operate a wind farm

of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation

I refer to your letter registered on 24 March 2026 enclosing details of the above development and inviting this Authority to comment on the proposal.

Consideration has been given to this matter, and I would inform you that this Authority does not wish to make any observations on the proposal.

1. That the Council does not wish to make any observations on the Scoping Direction.

Yours faithfully,

Ian Robinson



Head of Sustainable Development

APPLICANT:**AGENT:** Adeilad y Goron, , Parc Cathays,, Caerdydd, , CF10 3NQ**Glanllynfi Garth Wind Farm, Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl**

The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation

Background

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33(7) of the 2017 Regulations, for a Scoping Direction in relation to a proposed development to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation, located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl.

PEDW have stated that they would welcome the authorities advice on the scope of the EIA and the proposed methodologies outlined in the Scoping Report, in relation to the authority's functions.

The request has been accompanied by a Glanllynfi Garth Wind Farm EIA Scoping Report with appendices.

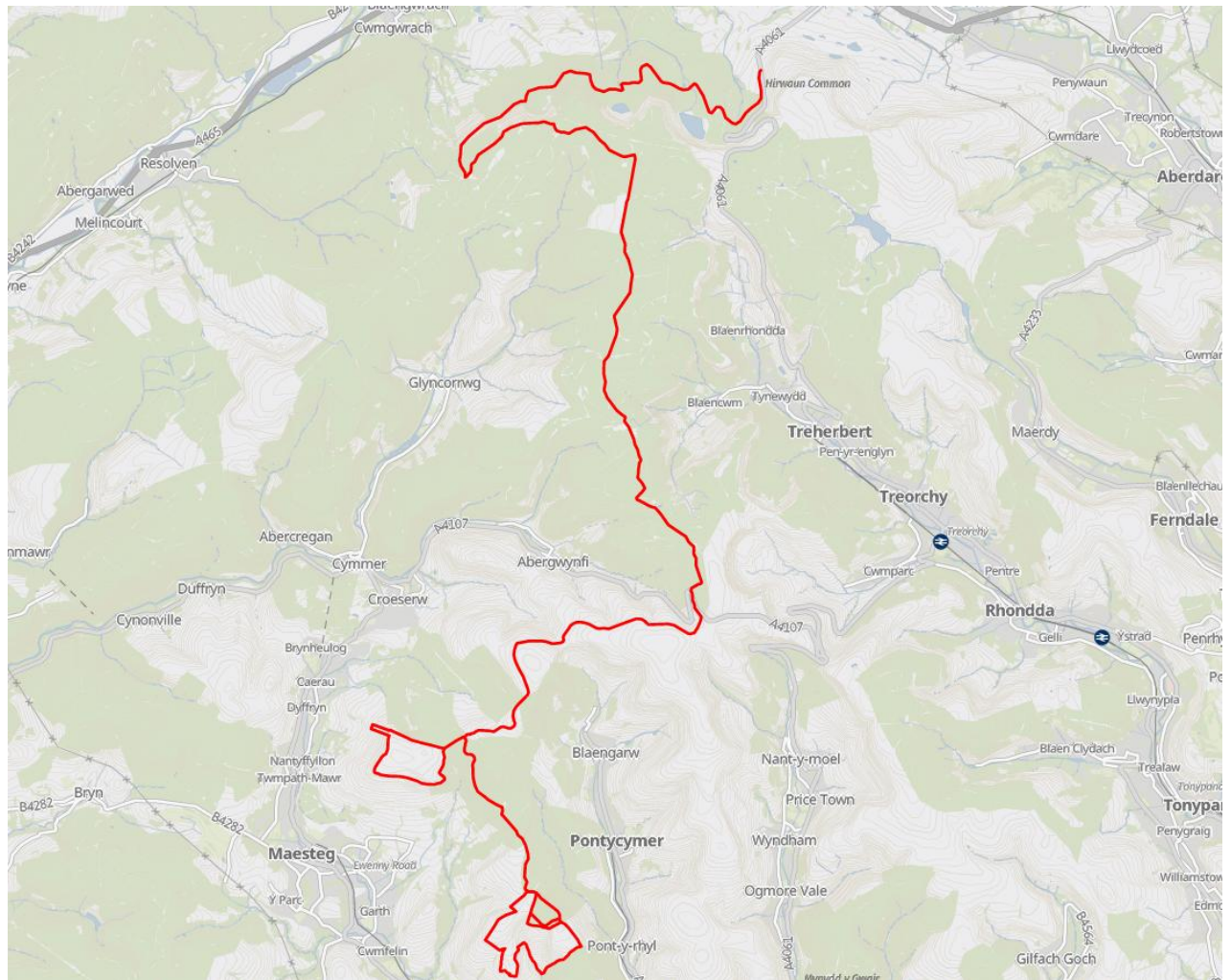
The authority have been consulted, along with a number of other neighbour authorities and consultees, on the proposed scope of the Environmental Statement (ES) for the proposed development, under regulation 33 (7) of the 2017 Regulations.

SITE AND CONTEXT

The development site comprises two land parcels which will be utilised for the construction and operation of the turbines. The land parcels are referred to as Northern Array (Pwll-yr-Lwrch) and Southern Array (Cynhordy).

The Proposed Development is predominantly within the administrative boundary of Bridgend County Borough Council (BCBC). However, the access track to the proposed development also traverses the Rhondda Cynon Taf County Borough Council (RCTCBC) and Neath Port Talbot Council (NPTC) authority areas.

Access to the Northern and Southern Array will be achieved via existing access tracks which serve operational wind farms in the area. Starting north at the A4061, the access tracks travel south through the Pen y Cymoedd Wind Farm, then cross the A4107 and traverse the Llynfi Afan Wind Farm.



DESCRIPTION OF DEVELOPMENT

The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation.

Glanllynfi Garth Wind Farm (the 'Proposed Development') consists of the following elements:

- Up to eight turbines;
- Substation and transformer housing;
- Temporary construction compound;
- Temporary site offices;
- Crane pads and cabling;
- Access track for construction; and
- Overhead line connection (via wooden pole) to agreed Point of Connection (POC) with National Grid Electricity Distribution (NGED).

The turbines are specified to have a height of 180 metres with a hub height at 105 metres and a rotor diameter of up to 150 metres

This Scoping Report has been prepared as part of an EIA relating to the Proposed Development. An EIA is required because the Applicant considers that the Proposed Development meets the criteria for EIA development under The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (No.567 (W.136)) (hereafter referred to as the 'EIA Regulations').

The Proposed Development requires an EIA because the applicant recognises the potential significant environmental effects of a development of this scale and it exceeds the thresholds within Schedule 2 Part 3 (Energy industry) (I) Installations for the harnessing of wind power for energy production (wind farms) of the EIA Regulations. This is because the development involves the installation of more than 2 turbines and the hub height of any turbine or height of any other structure exceeds 15 metres (m).

PLANNING HISTORY

None

CONSULTATIONS

None

REPRESENTATIONS

Not applicable

REPORT

Planning Policies and Guidance

The site falls outside of the administrative boundary of the Vale of Glamorgan and therefore the scope of the Vale of Glamorgan Local Development Plan.

Future Wales: The National Plan 2040:

Future Wales – the National Plan 2040 is the national development plan and is of relevance to the determination of this planning application. Future Wales provides a strategic direction for all scales of planning and sets out policies and key issues to be considered in the planning decision making process. The following chapters and policies are of relevance in the assessment of this planning application:

Chapter 3: Setting and achieving our ambitions

- 11 Future Wales' outcomes are overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales.

Chapter 4: Strategic and Spatial Choices: Future Wales' Spatial Strategy

- Guiding framework for where large-scale change and nationally important developments will be focussed over the next 20 years.
- Strategy builds on existing strengths and advantages and encourages sustainable and efficient patterns of development.

Chapter 5 – The Regions

- The Vale of Glamorgan falls within the South East region.
- Regional policies provide a framework for national growth, for regional growth, for managing growth and supporting growth.
- In the absence of SDPs, development management process needs to demonstrate how Future Wales' regional policies have been taken into account.

Policy 1 – Where Wales will grow

- Supports sustainable growth in all parts of Wales.
- Development in towns and villages in rural areas should be of an appropriate scale and support local aspirations and need.

Policy 17 – Renewable Energy

- Support for developing renewable and low carbon energy from all technologies and at all scales.
- Significant weight to the need to meet Wales' international commitments and the target to generate 70% of consumed electricity by renewable means by 2030 to combat the climate emergency.
- All proposals for large scale wind and solar developments should demonstrate that they will not have an unacceptable adverse impact on the environment and describe the net benefits it will bring.

Policy 18 – Renewable and Low Carbon Energy Developments of National Significance

- Sets out the criteria for assessing such proposals and refers to the need to consider the cumulative impact of existing and consented renewable energy schemes.

Policy 33 – National Growth Area – Cardiff, Newport and the Valleys

- National growth area is the focus for strategic economic and housing growth, essential services and facilities, advanced manufacturing, transport and digital infrastructure.
- Supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital region.

Planning Policy Wales:

National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) (PPW) is of relevance to the determination of this application.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

The following chapters and sections are of particular relevance in the assessment of this planning application:

Chapter 2 - People and Places: Achieving Well-being Through Placemaking,

- Maximising well-being and sustainable places through placemaking (key Planning Principles, national sustainable placemaking outcomes, Planning Policy Wales and placemaking)

Chapter 3 - Strategic and Spatial Choices

- Good Design Making Better Places
- Placemaking in Rural Areas
- Accessibility
- The Best and Most Versatile Agricultural Land
- Development in the Countryside (including new housing)
- Supporting Infrastructure

Chapter 5 - Productive and Enterprising Places

- Energy (reduce energy demand and use of energy efficiency, renewable and low carbon energy, energy minerals)

Chapter 6 - Distinctive and Natural Places

- Recognising the Special Characteristics of Places (The Historic Environment, Green Infrastructure, Landscape, Biodiversity and Ecological Networks, Coastal Areas)
- Recognising the Environmental Qualities of Places (water and flood risk, air quality and soundscape, lighting, unlocking potential by taking a de-risking approach)

Technical Advice Notes:

The Welsh Government has provided additional guidance in the form of Technical Advice Notes. The following are of relevance:

- Technical Advice Note 5 – Nature Conservation and Planning (2009)
- Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)
- Technical Advice Note 11 – Noise (1997)
- Technical Advice Note 12 – Design (2016)
- Technical Advice Note 15 – Development, Flooding and Coastal Erosion (2025)
- Technical Advice Note 20 – Planning and the Welsh Language (2017)
- Technical Advice Note 24 – The Historic Environment (2017)

Welsh National Marine Plan:

National marine planning policy in the form of the Welsh National Marine Plan (2019) (WNMP) is of relevance to the determination of this application. The primary objective of WNMP is to ensure that the planning system contributes towards the delivery of sustainable development and contributes to the Wales well-being goals within the Marine Plan Area for Wales.

Other relevant evidence or policy guidance:

- Town and Country Planning Act 1990
- Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016
- Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Equality Act 2010

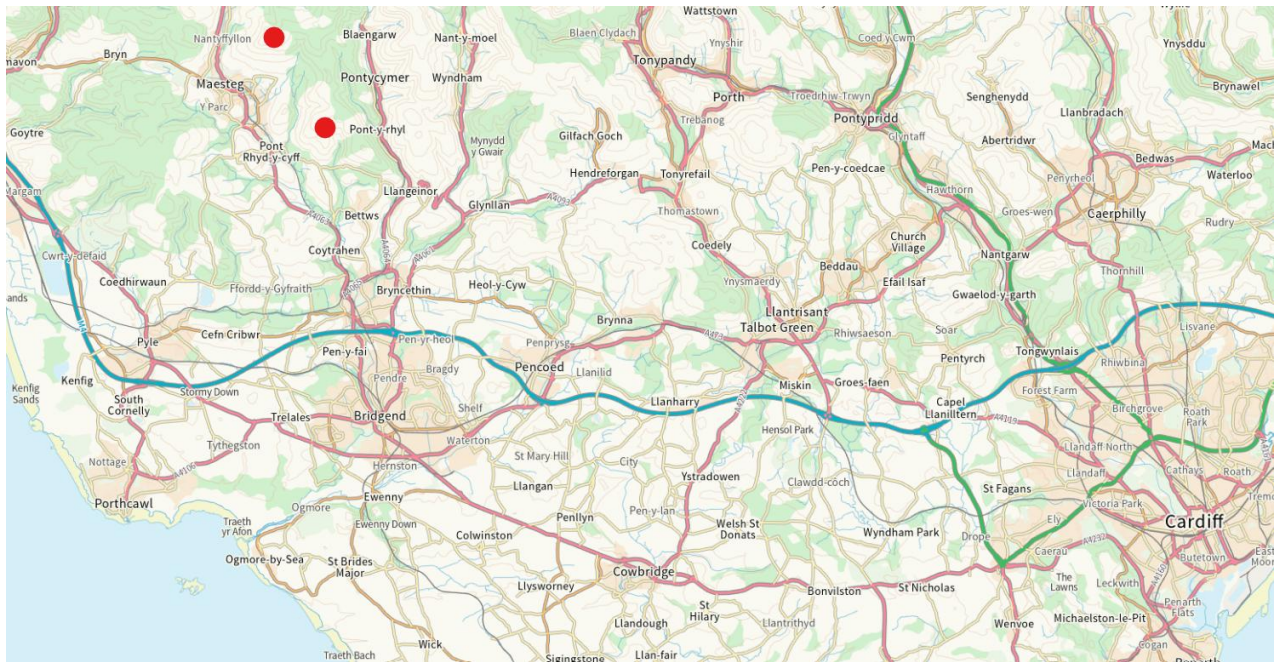
The Equality Act 2010 identifies a number of ‘protected characteristics’, namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council’s duty under the above Act has been given due consideration in the preparation of this report.

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council’s duty and the “sustainable development principle”, as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

Issues

In respect of the potential impacts on the Vale of Glamorgan, the application site is some 11.km to the north west of the Vale of Glamorgan administrative boundary, with the Southern Array (Cynhordy), being the closest point.



Application site (northern and southern arrays) shown indicatively

Given the distance of the two array sites from the Vale of Glamorgan, the only likely impact would be visual, although given the topography of the intervening area and the distance, it is not considered that the wind turbines would have any visual impact on the Vale of Glamorgan. On this basis and from the perspective of the Vale of Glamorgan, the authority do not wish to make any comments on the Scoping Direction. Whilst the authority does not wish to raise any specific matters, the applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4.

It is considered that Bridgend County Borough Council (BCBC), Rhondda Cynon Taf County Borough Council (RCTCBC) and Neath Port Talbot Council (NPTC) as the relevant Planning Authorities as well relevant consultees would be best placed to advise PEDW of the proposed scope of the Environmental Statement (ES) for the proposed development, given their localised / specialist knowledge of the environmental features likely to be affected by the development.

CONCLUSION

That the Vale of Glamorgan Council does not wish to make any observations on the Scoping Direction.

REASON FOR RECOMMENDATION

It is considered that the decision complies with the Council's well-being objectives and the sustainable development principle in accordance with the requirements of the Well-being of Future Generations (Wales) Act 2015.

The appropriate marine policy documents have been considered in the determination of this application in accordance with Section 59 of the Marine and Coastal Access Act 2009.

RECOMMENDATION

That the Council does not wish to make any observations on the proposal.

1. That the Council does not wish to make any observations on the Scoping Direction.

NOTE:

Please note that this consent is specific to the plans and particulars approved as part of the application. Any departure from the approved plans will constitute unauthorised development and may be liable to enforcement action. You (or any subsequent developer) should advise the Council of any actual or proposed variations from the approved plans immediately so that you can be advised how to best resolve the matter.

In addition, any conditions that the Council has imposed on this consent will be listed above and should be read carefully. It is your (or any subsequent developers) responsibility to ensure that the terms of all conditions are met in full at the appropriate time (as outlined in the specific condition).

The commencement of development without firstly meeting in full the terms of any conditions that require the submission of details prior to the commencement of development will constitute unauthorised development. This will necessitate the submission of a further application to retain the unauthorised development and may render you liable to formal enforcement action.

Failure on the part of the developer to observe the requirements of any other conditions could result in the Council pursuing formal enforcement action in the form of a Breach of Condition Notice.

Robert Sparey
Planning & Environment Manager
Planning and Environment Decisions Wales,
Crown Buildings,
Cathays Park,
CF10 3NQ.

PEDW.Infrastructure@gov.wales

Fy Nghyf/My Ref:
26/0198/SSO

Gofynnwch am-Please ask for:
James Emery 01443 281130

Dyddiad/Date:
14/04/2026

DATBLYGIAD
ARFAETHEDIG/
PROPOSAL :
LLEOLIAD
/LOCATION:

Scoping Opinion to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180m) and associated infrastructure including access tracks and substation Between Dyffryn, Maesteg and Garth To The West And Blaengarw Pontcymer And Pont-y-rhyl To The East

I refer to your correspondence received 3rd March 2026, relating to scoping direction, for the Environmental Statement (ES) to accompany the forthcoming planning application for a proposed wind farm between Dyffryn, Maesteg and Garth To The West And Blaengarw Pontcymer And Pont-y-rhyl To The East.

It is noted that the main windfarm development area of the proposed DNS would fall outside the administrative boundary of Rhondda Cynon Taf with only the access serving the development within Rhondda Cynon Taf.

Having consulted statutory consultees, and other interested parties, I would advise that the scoping report is a comprehensive document that addresses the key issues associated with the proposed development and the potential consequences of allowing the development.

The document advocates a conventional and widely accepted approach to the preparation of an ES and is generally considered acceptable in what it aims to achieve. There are no obvious gaps in terms of the planning policies at both national and local level, and it takes a consistent approach to scoping the issues relevant to the consideration of the proposals, identifying key issues.

As such, the document is generally considered acceptable. That said, we would however seek assurance that the following requirements will be adequately addressed in the various topic areas:

- o A statement of expertise.
- o Legislative and policy context and the methodological approach adopted in reassessing the likely significant environmental effects of the proposals.
- o The assessed effects of the proposals pre and post mitigation.

- o Where the assessed residual effects remain significant a conclusion on whether additional assessment may be required.

Ecology and Biodiversity

The Council notes that the proposed grid connection route lies within an area of north-west RCT that is entirely designated as SINC upland habitat, including areas of peatbog. These designated sites are not shown on the figures accompanying the Scoping Report that illustrate the grid connection corridor, and they should be included in the Environmental Statement (ES) baseline mapping.

Although the Scoping Report states that the grid connection will be delivered through the NGED process and that detailed design is not yet available, the indicative corridor appears to be already well-defined. Given its location within sensitive upland and peatland habitats, the grid connection has clear potential to give rise to significant ecological effects.

The Preliminary Ecological Appraisal submitted to date covers only the turbine locations and associated on-site infrastructure. It does not assess the ecological baseline or potential impacts associated with the grid connection corridor. As the grid connection is an essential component of the development, its likely significant effects must be assessed within the ES and an appropriate baseline ecological assessment should be provided.

Highways

The Highway Authority would require the developer to submit a Traffic Management Plan (TMP) in accordance with Welsh Government guidance, together with a Transport Statement that identifies the potential impacts on the existing highway network and sets out anticipated peak construction traffic. These documents must be submitted for approval prior to any works commencing on site.

Traffic Management Plan Requirements

The TMP must address both general construction traffic and all movements associated with Abnormal Indivisible Loads (AILs). AIL deliveries associated with the development shall be undertaken strictly in accordance with an approved TMP. The TMP must be submitted to, and approved in writing by, Welsh Government as the trunk road highway authority or the relevant local highway authority (as appropriate) prior to the commencement of any works. The TMP shall include, but not be limited to, the following:

- 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

- 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 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
- 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.

Yr eiddoch yn gywir / Yours faithfully,

James Emery
Senior Planning Officer

PEDW (Planning Environment Decisions Wales)

Date: 13 March 2026

Crown Buildings,
Cathays Park,
Cardiff, CF10 3NQ

Contact: Christopher O'Brien

Our Ref: 26/24449/SCO

Your Ref: DNS CAS-04687-J2G4Q0

PEDW.Infrastructure@gov.wales

Dear Robert,

Proposal: Glanllynfi Garth Wind Farm. Located Between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer And Ponty-y-rhyl.

"EIA Scoping Opinion - The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180m) and associated infrastructure including access tracks and substation. Operational life to be 30 years"

Thank you for consulting us to inform your scoping direction for the above development of national significance. Figure 5.1d of the Scoping Report identifies the location of the proposed northern array relative to the Bannau Brycheiniog (Brecon Beacons) National Park (BBNP).

In relation to our Authority's functions, we write to offer the following advice on the scope of the EIA and the proposed methodologies set out in the Glanllynfi Garth Wind Farm Environmental Impact Assessment (EIA) Scoping Report (hereafter "Scoping Report").

Proposed approach to assessing implications of landscape designations

We agree that scoped into the Environmental Statement are impacts on the following special qualities of the national park (paragraph 5.2.34):

- Special Landscapes: Sweeping grandeur and outstanding natural beauty,
- Special Landscapes: Contrasting patterns, colours, and textures,
- Special Experiences: Sounds, sights, smells and tastes, and,
- Special Experiences: Peace, tranquillity and dark skies.

Special qualities of Parc Cenedlaethol Bannau Brycheiniog are expressed in text, poetry, illustration and photography in Dyfodol y Bannau, the National Park Management Plan <https://future.bannau.wales/>

We consider Dyfodol y Bannau should be included in Table 5-44 – Policy Context as being of national rather than local or regional significance.

We have concerns the Scoping Report does not identify an appropriate methodology to enable reporting of effects in this regard. If including within the Landscape and Visual Impact Assessment Paragraph 5.2.4 of the Scoping Report should commit to the methodology set out in NatureScot

Special Landscape Qualities - Guidance on assessing effects¹ ("the NatureScot guidance"), published in January 2025.

Working to this methodology would require additional desk and site based data to inform the setting of an appropriate study area for assessing impact on special qualities. We recommend this is done in consultation with the National Park Authority. Currently no such study area is proposed, with the approach instead being to rely on the 27km used in the assessment on Landscape and Visual Impact.

Step 2 c Identify the study area (paragraph 24) of the NatureScot Guidance explains

The study area should relate to the location and type of the proposal and an initial prediction of likely significant effects. It may be a part or the whole of the NSA or National Park, but won't extend beyond the designation boundary. Fieldwork should be used to define the study area and then this should be mapped to show its boundary, location of all elements of the proposal and the assessment points. The study area should be agreed with the relevant decision-making authority and/or consultee as it may be different to the study area for a LVIA for the same proposal. This is because the SLQ assessment relates specifically to the SLQs and how these are experienced, and not the wider landscape characteristics or visual amenity.

Following the methodology will enable an appropriate study zone within the National Park to be set for residual impacts to be identified and would enable appropriate reporting of impacts on people's ability to enjoy the special qualities of their National Park.

Furthermore, as the study area would be focused on land within the National Park, away from the development site, a different cumulative envelope becomes apparent.

For major developments outside the National Park, we offer a discretionary pre-application advice service² and welcome discussions through this channel.

Landscape and visual effects scoped in for operational phase

We do not understand why the study area for the LVIA has been set to 27km rather than 28 Km.

The Zone of Theoretical Visibility (ZTV) to Blade Tip should be shown in full on Figure 5.1b *LVIA Study Area and Zone of Theoretical Visibility (ZTV) to Blade Tip* rather than be cut to the outer edge of the study area. This would likely demonstrate a greater extent of theoretical visibility in the Central Beacons area, for example in Fan Fawr lies just outside the study area yet there is theoretical visibility in close proximity to it.

We question the selection of VP 20 Craig Derlwyn BBNP as being the most appropriate location for a representative assessment of views available to walkers visiting the Bannau Brycheiniog National Park, especially as there are other closer viewpoints which may be visited by walkers including for example, Cribarth, Fan Gyhirych/ Fan Fraith, Fan Llia, Fan Fawr, Mynydd y Glog, and Cefn Yr Ystrad.

¹ [Special Landscape Qualities - Guidance on assessing effects | NatureScot](#)

² [PRE-APPLICATION-PLANNING-ADVICE-CHARGES-2025.pdf](#)

We consider Section 5.2.31 of the Scoping Report to be inappropriate. Especially as VP have not been scoped with the involvement of the National Park Authority. It asserts:

'Consultees should note that should alternative/ additional viewpoint locations be recommended as part of their response to the Scoping Report, then the photography would likely be undertaken outside of the optimum period for photography whilst trees are in leaf.'

Cumulative assessment

The approach to cumulative assessment omits the significance of Future Wales Pre Assessed Areas (PAA) and policy to each scenario. Future Wales provides strong policy support for repowering in PAA which should be reflected in the concept of 'timeframe' and duration in the ES beyond that stated in the Scoping Report which, although acknowledging options for extending the lifespan or installing new equipment assumes decommissioning after 30 years.

We consider, as having development plan status, that the cumulative effects with PAA for wind should be scoped and assessed. Currently it appears these areas would be scoped out of the cumulative assessment.

Conclusion

Thank you for consulting us. If you require any further information or clarification, please do not hesitate to contact us.

Yours faithfully,



Gareth Jones
Director, Planning and Place

Yr ydym yn croesawu gohebiaeth yn y Gymraeg. Bydd unrhyw ohebiaeth yn y Gymraeg yn cael ei ateb yn y Gymraeg a ni fydd unrhyw gyswllt trwy gyfrwng y Gymraeg yn arwain at oedi yn y mater sy'n cael ei drin.

We welcome correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in the matter being dealt with.

Contact Cyswllt Matthew Griffiths
Your ref Eich cyf CAS-04687-J2G4Q0
Our ref Ein cyf: P2026/0130

Robert Sparey
Planning & Environment Decisions Wales
Crown Buildings, Cathays Park,
Cardiff, CF10 3NQ

BY EMAIL ONLY

Dear Robert,

Project Name: Glanllynfi Garth Wind Farm

Site Address: Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl

Proposed Development: Construction and operation of a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation.

Introduction

I write with regards to your letter dated 3rd March 2026, this letter is a consultation under Regulation 33(7) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. It seeks our Authority's views on the scope of an Environmental Impact Assessment (EIA) for the above proposed development. Consideration has been given to the information provided in the EIA Scoping Report (SR), together with the relevant regulations and information that the Authority holds. Our advice is set out below.

Relationship of the development to Neath Port Talbot County Borough

Neath Port Talbot County Borough Council (NPTCBC) has reviewed the Environmental Impact Assessment (EIA) Scoping Report submitted in support of the proposed Glanllynfi Garth Wind Farm development. The Authority notes that the proposed turbines and associated infrastructure are located within Bridgend County Borough; however, elements of the development, including potential access arrangements and wider environmental effects, may extend into or affect the administrative area of Neath Port Talbot.

The Authority has therefore reviewed the scoping material with particular regard to potential cross-boundary effects on landscape and visual amenity, cumulative landscape effects, access and transport, public rights of way, and any environmental impacts that may arise within Neath Port Talbot County Borough. The comments below are provided to Planning and Environment Decisions Wales (PEDW) to help inform the determination of the appropriate scope of the Environmental Impact Assessment. They focus on matters where Neath Port Talbot County

Environment

Ceri Morris of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG
Tel 01639 686868

Yr Amgylchedd

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG
Ffôn 01639 686868

Borough Council considers further assessment or clarification may be required in relation to potential effects within or experienced from the authority area.

Landscape and Visual Impact Assessment (LVIA)

The Authority notes the proposed scope of the Landscape and Visual Impact Assessment and the accompanying Zone of Theoretical Visibility (ZTV) and viewpoint figures. The ZTV indicates that theoretical visibility of the proposed turbines may extend across parts of Neath Port Talbot County Borough, particularly across elevated upland areas to the west of the site, including the Margam uplands and the western slopes of the Afan Valley.

Whilst the proposed viewpoint list includes a range of locations within Bridgend County Borough and more distant receptors, it does not currently include viewpoints within Neath Port Talbot County Borough that would represent views experienced from these upland landscapes. Given the potential for theoretical visibility from these areas, the Authority considers that the LVIA should include representative viewpoints within Neath Port Talbot to assess potential cross-boundary landscape and visual effects.

In particular, consideration should be given to including viewpoints that represent:

- Upland recreational receptors on the Margam uplands (e.g. the Mynydd Margam ridge). Our Authority notes viewpoint 12, whilst this provides an upland recreational viewpoint within Bridgend County Borough, the Authority considers an additional viewpoint should potentially be included on the western upland ridge within Neath Port Talbot, for example on the edge of the Margam Upland Forestry block, to represent views experienced from Margam uplands and users of recreational routes in the locality;
- Views from the western skyline and upland ridges above the Afan Valley (e.g. Foel Fynyddau / Mynydd Emroch or comparable elevated locations). These areas have open ground and forestry edge tracks, are regularly used by walkers and provide long-distance views across the uplands. A viewpoint in this area would represent views experienced by recreational routes along this ridge.
- The Authority also considers that the LVIA should include a viewpoint representing residential receptors within the upper Afan Valley. The ZTV indicates potential theoretical visibility across parts of the valley side settlements, particularly around Croeserw and the eastern slopes above Cymmer. The Authority therefore recommends that a viewpoint is included within this area to represent views experienced by residential receptors in these communities where outward views towards the development may occur.

The inclusion of viewpoints in these locations would assist in ensuring that potential cross-boundary landscape and visual effects are appropriately represented within the assessment and that the experience of receptors within Neath Port Talbot County Borough is adequately considered.

Cumulative Landscape and Visual Effects

The Authority notes that the Scoping Report proposes to consider cumulative landscape and visual effects arising from existing, consented and proposed wind energy developments within the surrounding area. Given the number of operational and proposed wind farms across the upland landscapes between the Llynfi, Afan and Ogmore valleys, the Authority considers that cumulative effects will be an important aspect of the LVIA.

The cumulative figure included within the SR identifies several operational and proposed schemes within the wider study area. However, the Authority notes that the proposed Y Bryn Wind Farm, located to the west of the site and largely within Neath Port Talbot County Borough, does not appear to be referenced within the cumulative mapping. The Y Bryn Wind Farm proposal was recently refused but it is understood that this decision is subject to an on going Judicial Review. In light of this, it would be helpful for the LVIA to clarify whether this scheme has been considered within the cumulative assessment, or the basis on which it has been scoped out.

Given the location of the proposed development within a landscape where several large-scale wind farms are already operational, including developments such as Pen y Cymoedd, Llynfi Afan and Ffynnon Oer, the Authority considers that the LVIA should provide a robust assessment of potential cumulative landscape and visual effects across the upland ridge systems that extend between the Llynfi, Afan and Ogmore valleys. This should include consideration of the potential for sequential and combined visibility of wind energy developments when experienced from elevated viewpoints and recreational routes within the wider upland landscape.

Access and Transport

The Authority notes that the detailed construction access strategy for the proposed development has not yet been confirmed and will be assessed as part of the Transport Assessment accompanying the Environmental Impact Assessment. However, the Scoping Report indicates that access to the site will involve the use of the existing highway network within the surrounding valleys. Given the proximity of the access point of the development site to the boundary of Neath Port Talbot County Borough and the potential for construction traffic to travel via routes within the authority area, the Authority considers that the Transport Assessment should clearly identify the proposed construction access route and the extent to which the highway network within Neath Port Talbot may be utilised during the construction phase.

In particular, the assessment should consider any potential impacts associated with abnormal load deliveries and construction traffic on the local highway network, including routes serving the Afan Valley and surrounding communities. Where relevant, the assessment should also consider potential effects on highway safety, traffic flows and local amenity, together with any mitigation measures that may be required.

Clarification of the proposed access strategy at an early stage would assist in ensuring that any cross-boundary transport impacts are appropriately assessed within the Environmental Impact Assessment.

Public Rights of Way and Recreation

The Authority notes the Public Rights of Way (PRoW) network identified within the Scoping Report. The surrounding upland areas are crossed by an extensive network of public footpaths, bridleways and recreational routes that are widely used for walking, cycling and other outdoor recreation. Some of these routes extend across local authority boundaries and provide connectivity between Bridgend County Borough and Neath Port Talbot County Borough. Given the elevated and open nature of the surrounding upland landscapes, these routes may experience views towards the proposed turbines and associated infrastructure. The Authority therefore considers that the Environmental Impact Assessment should assess potential effects on recreational receptors using Public Rights of Way and other informal access routes within the wider upland landscape.

In addition, where construction access tracks or associated infrastructure may intersect with or run in close proximity to existing PRoW, the assessment should consider potential temporary effects during the construction phase, including disruption to recreational access and the need for any temporary diversions or management measures. The Authority would welcome further clarification of the relationship between the proposed development, construction access routes and the surrounding PRoW network to ensure that potential impacts on recreational users are appropriately assessed and, where necessary, mitigated.

Ecology

The Authority notes the findings of the Preliminary Ecological Appraisal (PEA) submitted in support of the Scoping Report. The ecological assessment appears to focus primarily on the turbine development areas within Bridgend County Borough and identifies a range of habitats and ecological receptors within and adjacent to the site.

Whilst the Authority does not have specific ecological comments on the turbine development areas themselves, it notes that the proposed development will include associated infrastructure and construction access routes. Where access routes or associated works extend beyond the main development site, the Authority considers that any ecological impacts arising from these elements should also be appropriately assessed. In particular, where construction access routes extend into or utilise areas within Neath Port Talbot County Borough, the Environmental Impact Assessment should consider any potential impacts on habitats, watercourses and protected species that may be present along these routes. Appropriate mitigation and management measures should be identified where necessary to avoid or minimise potential ecological effects.

Associated Infrastructure and Grid Connection

The Authority notes that the proposed development will include associated infrastructure such as on-site tracks, construction compounds, electrical infrastructure and a grid connection. At this stage the precise nature and routing of the grid connection has not been confirmed. The Authority considers that the Environmental Impact Assessment should clearly define the location and extent of all associated infrastructure required to connect the development to the electricity network. Where grid connection infrastructure or associated works extend beyond the main development site, the potential environmental effects of these elements should be appropriately assessed within the EIA, including any cross-boundary impacts.

Hydrology, Peat and Ground Conditions

The Authority notes that the development is located within upland landscapes characterised by areas of marshy grassland, heathland and a network of upland streams. The Environmental Impact Assessment should therefore consider potential effects on hydrology, watercourses and ground conditions arising from construction activities such as track formation and drainage works. Where peat or peat-forming soils are present, the Authority would expect the assessment to include appropriate peat depth surveys and, where necessary, a peat management strategy. Measures to prevent sedimentation and pollution of downstream watercourses during construction should also be identified through appropriate construction management plans.

Conclusion

Neath Port Talbot County Borough Council trusts that the above comments will assist PEDW in determining the appropriate scope of the Environmental Impact Assessment for the proposed development. The Authority would welcome the opportunity to review the findings of the Environmental Statement in due course, particularly in relation to any potential cross-boundary effects that may arise within or be experienced from Neath Port Talbot County Borough. The

Authority would also be happy to engage further with the applicant and PEDW should clarification be required on any of the matters raised above.

Yours sincerely



Matthew Griffiths
Senior Planning Officer
Neath Port Talbot County Borough Council

Dear Robert

Thank you for your email consultation letter relating to the Scoping Direction for the above potential DNS application.

In terms of the potential impacts on the administrative boundaries of the Swansea Council, it is acknowledged that the Scoping Report will include a Landscape and Visual Impact Assessment (LVIA) which will assess the likely significant effects, including cumulative effects of the proposed development on landscape and visual amenity receptors. It is noted that the LVIA Study Area of 27km from each of the turbine locations within the Glanllynfi Garth Wind Farm Development Site and that the designated area of The Gower National Landscape (which lies within the Swansea area) lies close to the edge of the Study Area, approximately 23km (at its closest point) to the west of the Development Site.

Additionally, that in terms of the Zone of Theoretical Visibility and Viewpoint Analysis, includes viewpoint 19 – Clyne Gardens - Located within the Gower National Landscape and within the Clyne Castle Registered Park and Garden. This viewpoint is from a Significant View identified within the Clyne Castle Registered Park and Garden and is representative of views of visitors to the publicly accessible Clyne Gardens. Therefore, we acknowledge and accept the assessment methodology of the LVIA.

Best Regards



David Owen
Prif Swyddog Cynllunio (Y Bae)
Principal Planning Officer (Bay)

Cyngor **Abertawe** [REDACTED]
Swansea Council [REDACTED]
[REDACTED]

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescale

Good Afternoon Rob,

Thank you for your consultation on the scoping for the above Development of National Significance. I can confirm that Caerphilly County Borough Council have no comments to make on the scoping report provided.

Kind regards,

Liz

Liz Rowley

Prif Gynllunydd | Principal Planner

Cyngor Bwrdeistref Sirol Caerffili | Caerphilly County Borough Council

Ein cyf/Our ref: CAS-302276-D5R2
Eich cyf/Your ref: CAS-04687-J2G4Q0

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 07 April 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**Town and Country Planning Act 1990
The Developments of National Significance (Procedure) (Wales) Order 2016
Town and Country Planning (Environmental Impact Assessment) (Wales)
Regulations 2017
Environmental Impact Assessment (EIA) Scoping Request**

Potential DNS Application: Glanllynfi Garth Wind Farm.

BWRIAD/PROPOSAL: The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation.

LLEOLIAD/LOCATION: Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 3rd March 2026. We note you seek our advice on the scope of the EIA and the proposed methodologies outlined in the 'Glanllynfi Garth Wind Farm EIA Scoping Report Scoping Report' by WSP dated February 2026.

We have reviewed the information provided. We provide the following advice about matters to be scoped into the Environmental Impact Assessment (EIA) and included in the Environmental Statement (ES) due to likely significant effects from the scheme.

This advice relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

1. General scoping advice

The ES for this development should include sufficient information to enable the determining body to determine the extent of any environmental impacts arising from the proposed scheme. Evaluation of the impacts of the scheme should include direct and indirect; cumulative; short, medium, and long term; permanent and temporary; positive and negative; during the construction operation and decommissioning phases.

The entire scheme should be described in detail. This description should cover construction, operation and decommissioning phases, and include detailed, scaled maps and drawings. Maps should clearly show each element of the scheme including access tracks and cabling routes.

We expect the description to include:

- The purpose and physical characteristics of the proposal;
- Location, development size, and configuration of the development, including flexibility of the site layout;
- Procedures for good working practices;
- Identification of appropriate pollution contingency and emergency measures for watercourses on site;
- Timing of all works and contingency plans should slippage in the programme occur;
- Maintenance requirements of structures;
- Arrangements for maintenance and management of any habitats within the site;
- Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure.

Maps, drawings, and illustrations produced to describe the project should be designed in such a way they can be overlaid with drawings and illustrations produced for other sections of the ES, such as biodiversity.

The ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

We note the topics proposed to be scoped into the EIA include:

- Landscape and visual impact assessment
- Biodiversity (including designated sites and protected species)
- Ornithology
- Water environment
- Ground conditions

2. Landscape and visual impact assessment

Our advice concerns the landscape character and visual amenity of the Bannau Brycheiniog National Park (BBNP) and the Gower National Landscape (GNL)¹ and their statutory purpose to conserve and enhance natural beauty.

The main component of the proposed development is 8 wind turbines with a maximum blade tip height of 180m and rotor diameter of 150m. The site falls partially within a Pre-Assessed Area (PAA) for Wind Energy (Area 9) defined in Future Wales: The National Plan 2040. In PAAs there is a presumption in favour of large-scale wind energy development subject to the criteria in FW policy 18. These include consideration of the cumulative impacts of existing and consented renewable energy schemes.

Section 5.2 of the scoping report describes the proposed scope and approach to the assessment of landscape and visual effects (LVIA).

¹ The name for the statutory designated Area of Outstanding Natural Beauty (AONB)

It is proposed to prepare an LVIA in accordance with relevant guidance, including:

- Third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) produced by the Landscape Institute and the Institute of Environmental Management; and
- Assessment and Technical Guidance Note LITGN-2024-01 - Notes and Clarifications on Aspects of GLVIA3) prepared by the Landscape Institute.

Site Location

The proposed turbines are to be located across two separate parcels of land:

- Northern Array (Pwll-yr-Lwrch) – Approximate Grid Reference SS 87102 92887 (approx. 15km south of the BBNP and 24km east of the GNL), and
- Southern Array (Cynhordy) – Approximate Grid Reference SS 88988 89854 (approx. 17.5km south of the BBNP and 25km east of the GNL)

The Scoping Report proposes an LVIA study area of 27km distance from each turbine. This accords with recommended study areas in NRW Guidance Note (GN) 46 *Using LANDMAP in Landscape and Visual Impact Assessments*.

Viewpoints

The Zone of Theoretical Visibility (ZTV) analysis (Figure 5.1d) identifies parts of the BBNP and GNL within the proposed LVIA study area. It indicates up to all 8 turbines would be visible from within parts of both designations. It is proposed to include one assessment viewpoint (VP) within each designation, as follows:

- VP 19: Clyne Gardens (GNL)
- VP 20: Craig Derlwyn (BBNP)

Baseline photography has not been submitted so we are unable to comment specifically on the appropriateness of the proposed locations. However, we advise:

- VP 19 is located in an area where existing tree cover may restrict visibility. Mumbles Hill provides uninterrupted views over Swansea Bay and an additional viewpoint from here would usefully complement VP 19.
- Regarding VP 20, we note other potential viewpoints within the BBNP which are located closer to the development and are more elevated, potentially offering increased visibility. For example, the elevated land east and west of Glyntawe, including the Ogof Ffynnon Ddu National Nature Reserve which is crossed by the Beacons Way and Cambrian Way. We recommend potential viewpoints in this location are considered and either included or ruled out with reasoning.

Notwithstanding the above, in views from the BBNP it is likely the proposed turbines would, where visible, be seen behind and/or in the context of existing wind turbine developments between the proposed development and the national park.

It is proposed to prepare visualisations from each viewpoint and these will accord with relevant SNH guidance. These will include 90° (cylindrical projection) baseline photographs and wirelines (including cumulative wirelines where relevant), and 53.5° (planar projection) photomontages and wirelines. This is appropriate.

Landscape Receptors

We are satisfied that the following landscape receptors will be scoped into the LVIA:

- The Special Qualities (SQs) of the BBNP with the following SQs scoped into the LVIA as they relate to visual and perceptual aspects of the BBNP: Special Landscapes: Sweeping grandeur and outstanding natural beauty, Special Landscapes: Contrasting patterns, colours, and textures, Special Experiences: Sounds, sights, smells and tastes, and Special Experiences: Peace, tranquillity and dark skies.
- The SQs of the GNL, with the following SQs scoped into the LVIA as they relate to visual and perceptual aspects: Landscape, Seascape and Tranquillity.

We advise that stated Special Qualities are headlines and any assessment of the impacts on these qualities should be informed by detailed supporting evidence, including that found in e.g., the BBNP Landscape Character Assessment, August 2012 and LANDMAP.

Cumulative Assessment

We support the proposal to assess both additional and combined cumulative effects alongside existing, consented, and in-planning wind turbine schemes.

Design Considerations

Design guidance to support Future Wales Policies 17 and 18 has been published (*Designing for Renewable Energy in Wales, Design Commission for Wales, November 2023*). This guidance recognises the importance of landscape informing the design of large-scale renewables, and states:

‘Landscape should be the leading consideration in this process and not merely follow on in the form of ‘landscape mitigation’ of a predetermined engineering proposal and technical appraisal’ (page 19).

Planning Policy Wales (5.9.21) likewise requires:

‘low carbon energy developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures’.

We advise these measures include the number, siting, and arrangement of turbines. We therefore expect the Environmental Statement to clearly explain how LVIA findings have influenced the design, including turbine location, scale, number and configuration.

3. Designated Sites

We agree with the scoping report assessment that the following Special Areas of Conservation (SAC) will require consideration through a Habitats Regulations Assessment (HRA): Cefn Cribwr Grasslands SAC (8.8km south of the Northern Array and 6km southwest of the Southern Array); Blackmill Woodlands SAC (7.7km southeast of the Northern Array and 4.3km southeast of the Southern Array); and the Limestone Coast of South West Wales SAC (29km west of the Northern Array and 30.8km west of the Southern Array) as it is designated for bats.

We also agree that the following Sites of Special Scientific Interest (SSSI) have been appropriately scoped in: Cwm Du Woodlands SSSI (1.2km south of the Northern Array and 0.4km west of the Southern Array); and Coedymwstwr Woodland SSSI (12.9km southeast of the Northern Array and 9.7km southeast of the Southern Array) due to the presence of bats roosting within the SSSI.

However, we do not agree with the conclusion presented on page 74 of the EIA Scoping Report, which states 'Cwm Cyffog SSSI is located 4.7km southwest from the Northern Array which is considered to be of a sufficient distance from the Development Area, and without impact pathways such as watercourses, so that it, or its features, would not be impacted by the Proposed Development'. Cwm Cyffog SSSI also lies 1.7 km from the Southern Array, given this proximity, we require Cwm Cyffog SSSI (4.7 km southwest of the Northern Array and 1.7 km east of the Southern Array) to be scoped in so that any potential impacts arising from the proposed development can be appropriately assessed.

4. Protected Species

Key Habitats

Any habitat surveys should accord with the [Handbook for Phase 1 habitat survey – a technique for environmental audit \(2010\) | JNCC Resource Hub](#). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

The Phase 1 survey results should be presented alongside details of the current annual management of the site, including changes which may influence use of the site by protected species.

Protected Species Surveys

We advise that the site and where necessary land adjacent to the site is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. Targeted species surveys should be undertaken for all species scoped in which:

- i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA.

Defining the site

We note the survey boundary for the Preliminary Ecological Appraisal differs from the site boundary set out in Figure 1.1 Site Location Plan. We note the northern and southern array boundary are slightly smaller than the survey boundary used. The survey boundary did not include the access track that is shown as within the red line site boundary on Figure 1.1.

We note from Chapter 2 of the EIA Scoping report (2.3.7) that the proposed access track is an existing track which may require upgrading. Chapter 2 states underground cables will link the turbines (2.3.9); and that overground grid connection will form part of the DNS application for the development (2.3.15). We advise these, and any other associated infrastructure works for the project, are considered for potential impacts on ecological features within the ES.

Bats

We note that the site will be located across two land parcels comprised of semi-improved grassland, marshy grassland and heathland.

We advise that the application be supported by bat activity surveys of the site in accordance with:

- Bats and Onshore wind turbines – survey, assessment and mitigation by Nature Scot dated August 2021;
- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) by Bat Conservation Trust dated 2023.

[Bats and onshore wind turbines - survey, assessment and mitigation | NatureScot](#)
[Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition - Guidance for professionals - Bat Conservation Trust](#)

Bat activity surveys

We note spring, summer and autumn surveys are proposed, collecting data on a minimum of 10 nights per season. Detectors should be placed at the proposed turbine locations. We advise Ecobat is used to analyse bat activity data collected. We advise that analysis is undertaken per species, per season and per turbine location, so that comparisons of bat use in different seasons, and at the different detector locations can be made.

Survey design and proposed placement of turbines should consider types of habitats present, aiming to ensure bat buffers distances are maintained or created from bat habitat features (Nature Scot 2021 guidance section 7.1.2).

Bat roosts

The EIA Scoping Report states structures and trees were subject to a daytime assessment during the preliminary ecological appraisal. One rocky outcrop and 36 trees were identified to have potential to support bats. Further survey of these potential roost features is proposed where the feature could be subject to an impact.

We advise that the bat buffer distance (see Nature Scot reference above) for each turbine location is calculated and considered. Any potential roost features within these buffers should be subject to further survey for bats. Due to potential siting adjustments and micro-siting allowances, it would be welcomed if features are also surveyed where they are within 250m of a proposed wind turbine location.

If other associated works for the project (as referenced above in the 'defining the site' section) may directly or in-directly impact potential roost features, these should be subject to bat surveys following the guidance above.

We welcome that inspection and assessment surveys of roost features are proposed. For trees, these should comprise ground level tree assessment surveys to assess potential to support roosting bats. We advise those needing to be felled or pruned to facilitate development, which are identified to have potential to support maternity roosts (PRF-M), or require further assessment to confirm potential (FAR), are subject to further surveys in accordance with the published best practice survey guidance (e.g. climbed, endoscope surveys). Where structures or buildings with potential to support bats are identified, if the proposals have potential for direct or indirect impacts on these, they should be subject to further bat surveys, in line with best practice guidelines.

Should any bat roosts be confirmed, we advise that an assessment of the impacts of the scheme on bats and their roost sites, and proposals to mitigate or compensate for them, is included in the EIA.

Bat Nighttime Walkover Surveys

The Preliminary Ecological Appraisal states linear habitats on site such as lines of trees, dry-stone walls and streams, provide suitable habitat for commuting bats. We would welcome results of nighttime walkover surveys to help establish key linear features and flight paths for bats on the site.

Great Crested Newt (GCN)

We welcome the identification of water bodies that might support GCN within 500m of the site, and the proposed further survey of these water bodies.

In general for GCN, we advise that surveys for GCN cover all waterbodies within 250m of the development works. Surveys should follow the guidance set out in:

- Great Crested Newt Mitigation Guidelines (English Nature, 2001); and
- [Natural Resources Wales / The use of environmental DNA test for Great crested newt licensing purposes](#)

We advise against using HSI assessment alone to determine whether to undertake presence/absence survey. Should presence/absence survey results indicate presence of the species, we advise that population size class surveys are carried out. We advise GCN surveys are undertaken as early in the survey period as possible to maximise the chance of visiting waterbodies whilst they hold water.

Water vole

We note habitat suitable to support water vole has been identified on site within ditches and marshy grassland. We welcome proposed further survey for water vole. Surveys for water vole should accord with the guidance set out in Water Vole Mitigation Handbook (Mammal Society, 2016).

Where present, the EIA should then consider impacts on water vole, setting out an assessment of the impacts of the scheme on them, and proposals to mitigate or compensate for them.

Dormouse

We note there are no records of dormouse on or adjacent to the site, and the Preliminary Ecological Appraisal states the habitats on site are generally poor for dormouse and that dormouse is likely to be absent from site. We advise it is clarified whether there will be any loss of habitat that could support dormouse as part of this development. Measures to retain and protect hedgerows and woodland for the scheme would be welcomed.

Invertebrates

We note that the list of protected and notable species proposed for scoping does not currently include the Marsh Fritillary Butterfly. Although, the Marsh Fritillary larval food plant, Devil's-bit Scabious was not recorded during the Phase 1 vegetation surveys undertaken in February and March 2025, these months are a sub-optimal period for botanical surveys, particularly on sheep-grazed land. The proposed development is located on marshy grassland and there are several records of Marsh Fritillary within 2 km of the site. This includes a verified 2022 record approximately 1.9 km from the southern array and 1.4 km from the northern array. The Marsh Fritillary's functional landscape is defined as the area within a 2 km radius of known populations.

On this basis, the development lies within the species' functional landscape, and there is a justification for the Marsh Fritillary to be included within the scope of the assessment. This should include appropriately timed surveys for its larval food plant, Devil's-bit Scabious, as well as an evaluation of suitable habitat within the development footprint.

We also note that invertebrate surveys have been scoped out of the assessment. Given the ecological context of the site, these surveys should be scoped in. We refer you to the local authority Ecologist for further advice on this matter.

Impact Assessment

Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified.

We advise comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species.

We advise that EIA considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration be given to the current conservation status of the relevant species. The EIA must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.

Where proposals implicate protected species which are also notified features of designated sites (e.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from both perspectives.

We advise that the EIA sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EIA.

EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended):

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

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be 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;*
- (b) There is no satisfactory alternative; and*
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.*

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2024, section 6.4.35 and 6.4.36, and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The decision-making authority will take them into account when considering an EIA where a European Protected Species is present.

Local Biodiversity Interests

We recommend the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and are that are considered important for the conservation of biological diversity in Wales. We would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups).

Finally, we advise that the development incorporates robust green infrastructure that will remain unlit to allow protected species to continue to inhabit the site and move through it. It is vital that the design of the development avoids narrow green infrastructure corridors through it, and avoids breaks in those corridors.

5. Ornithology

We consider the suite of surveys proposed in the scoping report is appropriate for the nature of the scheme. We welcome the two years of vantage point surveys and agree with the overall approach to assessment. Based on the information provided to date, the ornithological receptors scoped-in/-out appear appropriate.

We advise determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical. Relevant population estimates can be found in, but not limited to, Hughes et al. 2020 (Wales), Birds of Wales/Adar Cymru (Pritchard et al. 2021), Woodward et al. 2020 (UK/Britain), and the UK Rare Breeding Birds Panel. County Bird Reports, and the Welsh Bird Reports may also contain relevant information.

We further advise details of appropriate mitigation (following the step-wise approach outlined in PPW12) for any likely significant effects identified should be provided along with appropriate enhancements. In some instances, mitigation may need to take the form of curtailment or redirection of activities during particular times of year. Where buffer distances are required or need to be considered then reference should be made to Goodship & Furness 2022 or alternative published references for species not listed within Goodship & Furness 2022.

6. Peat

We advise peat should be scoped into the EIA.

Based on the information currently available in the scoping report, the extent of peat within the site is likely to be localised and project infrastructure may be capable of avoiding peatland impacts. However, we observe there is evidence of peat in the site and that the access track has not been assessed with regards to peat. Therefore, further information is required to confirm the presence or absence of peat across the whole site, to enable a full assessment of the impacts on peat and peatlands.

We welcome the use of the Peatland of Wales map to indicate the presence of peat, which appears to be localised to the Northern array. While the map may not represent the full extent of peat and deep organic soils at the site, it is a significant step in identifying peat soils and should be utilised as first step of development. From the potential presence of peat on site we recommend conducting a phase 1 peat survey, conducted across a 100 m grid and supported by confirmatory coring. We request the peat data is mapped with site location, interpolated peat depth (extended into survey area), probing location and cores/auger (to confirm the probing is reliable), before recommending if a phase 2 peat survey is required. This is required to confirm presence or absence of peat across the site and to meet the stepwise approach laid out in PPW12.

For all subsequent soil surveys, we recommend using the definition of peat soils are defined by the Soil Survey of England and Wales (1980) as:

1. More than 40cm of organic (O horizon) material within the upper 80cm, excluding fresh litter (L) and living moss; or
2. More than 30cm of organic (O horizon) material resting directly on bedrock (R or Cr) or skeletal material (in situ angular broken-up rock) and
3. No overlying non-humose material mineral horizon that has a colour value of 4 or more and extends below 30cm depth."

NRW also recommend the following additional definition:

"Where shallow organic soils under 30 cm deep are also supporting peatland habitat and/or integral to the hydrological functioning of wider peat bodies, these should also be defined as peatland habitats."

In some areas, natural heterogeneity may mean peat depth surveying undertaken on a finer scale than 50 m spacings, for example finer resolution might be needed around infrastructure. The peat and organic soil data obtained by hand auguring and other peat condition data should be presented along with correlation to overlaying vegetation type and communities. Peat depth mapping also needs to be presented against all planned development and associated plans for soil movement (if occurring).

If peat is present on site, we request a Peat Management Plan is provided to quantify the volumes of peat (deep and shallow) being extracted, to set out handling, storage, reinstatement and aftercare. We recommend that any volumes of peat excavation during development to be calculated including organic soils under 30cm deep. Should there be any impacts on peatlands/peat soils then the drainage impacts of peatland should form part of any calculations of loss/damage to peat and peatlands. Removing topsoil of vegetation or installing infrastructure that impacts drainage can cause drying out, erosion and peat oxidation. Similarly, changes in water table and moisture regimes from planned infrastructure can result in increased carbon dioxide emissions in peatlands. Therefore, as advised in PPW 12 (paragraph 1b of 6.4.15 of PPW 12) to safeguard irreplaceable habitats and peat, the infrastructure should seek to avoid areas of peat and peatland vegetation. This stepwise approach within paragraph 1b of 6.4.15 of PPW 12 seeks to minimise initial impact by, “maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, by minimising development size and appropriate orientation on site”. Given the nature of the proposals and the potentially limited potential for peat and peatland vegetation in many parts of the site, we believe that this could be avoided through strategic infrastructure.

We note that the access track makes use of operational wind farm tracks and these may require upgrading. While we understand that existing track will be used, if the upgrading of track requires track widening, vegetation clearance or drainage, this could impact on surrounding peat and peatland. The Peatland of Wales maps show a large extent of peat north of Abergwynfi, where the track extends too. We request plans for upgrading tracks, along with phase 1 habitat mapping and phase 1 peat survey as a minimum, to ensure there are no impacts on peat or peatland habitats. We recommend that peat survey for track upgrading should be conducted on a 50 m interval at an offset of 10 m on any areas of track widening. Where peat is found the sampling needs to be conducted at 25 m grid to 30 m grid either side of the track to ensure a high enough sampling resolution. Peat depth sampling needs to be supported by confirmatory coring. As advised above, if peat or peatland habitats are to be impacted, we would expect PPW 12 stepwise to be followed and a Peat Management Plan to be produced.

We welcome the Phase 1 habitat survey for the majority of the site. We require that Phase 1 habitat survey of the whole site and National Vegetation Classification (NVC) surveys of semi-natural vegetation be undertaken (including access track with an offset interval). We request these surveys be presented alongside peat depth mapping to present a full understanding of the impacts on peat and peatland habitat. Figure 8 (Appendix E- Preliminary Ecological Appraisal) shows wet heath is present in small sections. Wet heath is a habitat published under Section 7. If these habitats also correspond to area with peat, these need to be protected under PPW 12. Peatland habitats are semi-natural habitats associated with both peat soils and shallow peat and listed under Section 7 of the Environment Act (Wales) 2016. Paragraph 6.4.15 1a and 1b and 6.4.34 of PPW covers all areas of peatland habitat on both peat soils (above 30 cm depth) and shallow peat soils (below 30 cm depth). If infrastructure is proposed in areas with a likelihood of deep peat,

and/or peatland habitat, this will need to be justified in terms of this adoption of the stepwise approach.

We expect that the NVC surveys should present both the conclusions of community placement and the underlying data that support the community placement should be presented. Where there are transitions between communities within stands of vegetation these should be mapped as community mosaics with an estimate of the proportion of each community type, again the underlying data that support the community placement should be presented. If possible, and where relevant, the guidance on NVC mire communities outlined in Turner (2010)² should be followed. All colours used in the mapping should allow clear differentiation between different habitats and vegetation types.

The Phase 1 and NVC surveys should correlate the vegetation types to section 7 habitats and the depth of underlying peat/organic soils. Peatland habitats are semi-natural habitats associated with both peat soils and shallow peat and listed under Section 7 of the Environment Act (Wales) 2016. In cases where section 7 habitats occur on peat, then these must be considered part of the relevant section 7 peatland habitat. Deep peat and deep organic soils can often occur under vegetation that does not otherwise appear to be mire vegetation such as dry heath vegetation. These are still peatland habitats. The scoping report notes that areas of deep peat on the site may be located beneath conifer plantation. Similarly, many stands within conifer plantations contain pockets of semi-natural vegetation, including peatland. While the scoping report states that the peat is likely to be “drained/damaged”, we would like to acknowledge that plantation forestry has only been present for a few decades, whereas the underlying peat has taken thousands of years to form. Almost all afforested blanket bog can be restored to peatland priority habitat, and the National Peatland Action Programme has demonstrated substantial success in plantation-to-bog restoration. PPW 12, footnote 129, notes that “habitats and the resources that underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed”. This criterion applies regardless of the current condition of the peatland resource.

We note the scoping report states in section 2.3.15 ‘The Applicant has undertaken discussions with National Grid Electricity Distribution (NGED) with regard to the grid connection for the Proposed Development. It is understood that the intention is for NGED to deliver the connection and at the time of writing this Scoping Report, it is assumed that the connection would be overhead (via wooden poles). The connection to the PoC will be included in the DNS Application for the Proposed Development.’

7. Land Contamination and Groundwater

We concur with the matters that are proposed to be scoped in and out of the EIA with regards to land contamination and groundwater as described in sections 5.6 Water Environment and 5.7 Ground Conditions of the scoping report. The following matters /points, however, should be taken into account in progressing a scheme for the proposal and detailed in the EIA/supporting information

² Turner, A.J. 2010. Guidelines to NVC community definitions for the M17/M18/M21/M2/Nodum 19 complex in Wales. CCW Staff Science Report Number 10/07/02

- In developing a scheme (wind turbine location and associated excavations, cabling routes, access tracks and drainage, laydown areas, electrical infrastructure) given the topography of the site/area, there may be need to consider particular drainage features/controls to ensure that current natural drainage patterns continue during the operational phase and that the water environment is not impacted by erosion and the release of sediments as a result of erosion processes. The release of sediment may also adversely affect the operation and water quality of local abstractions or private water supplies, depending on their distance from the scheme and associated construction and operational activities.
- Whether preliminary site investigations work will be set out and implemented to inform the infrastructure design. It is recognised that the proposed development area has an historic mining legacy and it may be that some ground information which may include groundwater, may need to be determined as part of ground risk appreciation and used to draft sections of the ES.
- Decommissioning has been referenced within the scoping report as effectively construction in reverse. This is a simplistic view as ~30 years of windfarm operation will have passed. Decommissioning activities should be controlled in terms of activity and what is / is not to be removed from site. As such it may be beneficial to provide a Preliminary Decommissioning Assessment on the nature, extent and duration of particular decommissioning activities. The Assessment should state what elements of the development scheme are proposed to be left in perpetuity at the site, for example buried cabling, as this has an inherent risk to the environment as the cabling will eventually degrade and release chemicals.

8. Water Framework Directive (WFD)

We note reference within the scoping report to Water Framework Directive Catchments. We advise the EIA include a WFD assessment to assess if any watercourses within WFD catchments would be affected by the proposals/cause deterioration in the overall status of waterbodies.

9. Construction Environmental Management Plan (CEMP)

We welcome that the scoping report makes reference to the potential preparation of an outline CEMP as part of the EIA or secured via a condition attached to any planning permission granted. We agree a detailed CEMP is required.. We advise the application site crosscuts the headwaters of numerous catchments. Headwaters are generally considered to be pristine with regard to water quality and any development should seek to maintain this both during construction as well as into the life of the site.

10. Flood Risk

All watercourses within the site boundary are classified as ordinary watercourses (rather than main rivers) and therefore any culverting/crossings or works to these rivers would be subject to consent from the relevant Lead Local Flood Authority.

We welcome the inclusion of a Flood Risk Assessment. We will be able to provide further information on this when greater detail of the scheme is provided.

Other Matters

We note part of the application site is within NRW's forestry ownership (this excludes much of the proposed northern and southern array) and advise liaison with the appropriate team within NRW in this regard.

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

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

Yn gywir / Yours faithfully,

Annabelle Evans

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

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

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

Planning and Environment Decisions Wales

Eich cyfeirnod
Your reference

DNS CAS-04687-J2G4Q0

Sent by email

Ein cyfeirnod
Our referencePedw.Infrastructure@gov.walesDyddiad
Date

7 April 2026

Llinell uniongyrchol
Direct lineEbost
Email:Cadwplanning@gov.wales

Dear Sir/Madam

EIA SCOPING – GLANLLYNFI GARTH WIND FARM

Thank you for your letter of 3 March asking for Cadw's advice on the scope of the Environmental Impact Assessment (EIA) and the proposed methodologies outlined in the Scoping Report for the above proposed wind farm.

Designated Historic Assets

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant, Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled monuments, listed buildings, registered historic parks, gardens and landscapes. A list of the designated historic assets affected by the proposal is provided at Annex A.

Advice

This advice is given by Cadw's Senior Historic Environment Planning Officer in response to a scoping opinion as to the contents of an EIA that will be submitted in support of an application for the Glanllynfi Garth Wind Farm. The advice is provided without prejudice to the Welsh Government's consideration of the application should it come before it formally for determination.

The request for a scoping opinion is accompanied by a scoping report prepared by WSP with section 5.3 outlining the methodology that will be used to assess the impact of the proposed windfarm on the historic environment.

We concur with the baseline information in this section, and the methodology for determining the “Significance of Effects” but in our opinion the proposed assessment methodologies being used to determine the impact of the proposed windfarm on the historic environment require additional work.

Sections 5.3.43 -5.3.46

We agree that a Historic Environment Desk-Based Assessment (HEDBA) should be produced but as well as the study of relevant records and sources of information held at the listed repositories there is a need for National Wales 1 metre DTM and DSM Lidar datasets to be analysed. This may help to target previously unrecorded sites within the application area. Any new sites located on the Lidar must be verified on the ground by the archaeological team during a walkover survey of the whole application area and all newly identified sites mapped, described, photographed and interpreted with images and an accompanying gazetteer of sites included in the report. All sites should be categorized for their importance and the significance of impact stated in the EIA.

During the iterative design process and depending on the feedback from the HEDBA and walkover surveys, there may be a requirement to gather more information on the sub-surface archaeological potential of the development area, which will not normally be apparent from a desk based and walkover study alone. This requirement would be triggered by clusters of surface monuments suggesting high levels of nearby activity, typically prehistoric funerary and ritual monuments, for which associated sub-surface archaeology may be present, but cannot be properly quantified and located. It may also be triggered where prior surveys cannot accurately define the nature of surface or sub-surface features without retrieving more information. [Heneb: The Trust for Welsh Archaeology, Clwyd-Powys Archaeology](#) should be consulted on the need for geophysical survey after the DBA and walkover survey reports have been presented to them for comment. If geophysical anomalies are located but are not diagnostic enough to allow informed opinions on dating, function, level of preservation and importance then additional intervention by targeted evaluation trenching may also be required prior to the completion of the environmental statement in accordance with *Planning Policy Wales* and *TAN24 Historic Environment*.

The impact on intact peat deposits which may contain important paleoenvironmental evidence and artefacts of prehistoric date should be assessed. There may be some surface exposures of peat, boggy areas and pools within the development area which may indicate the sub-surface presence of peat deposits. Normally the peat deposit depths and extent will be mapped as part of the “NRW Peat Management Plan” requirements and in archaeological terms we would generally be interested in any peat deposits deeper than 0.4m although shallow deposits can also be archaeologically significant. The turbine and infrastructure layout should seek to avoid all peat deposits. Where significant peat deposits cannot be avoided a suitable scheme of sampling, analysis, dating and reporting will need to be completed using appropriate sampling techniques advised by a paleoenvironmental/geoarchaeological specialist.

A realistic time period should be set aside to complete the archaeological assessment, reporting and mitigation discussion before the application is formally submitted for examination and in accordance with guidance on pre-determination

archaeological evaluation set out in *Technical Advice Note 24 Historic Environment (March 2026)*: Paragraph 4.7 and *Planning Policy Wales (Feb 2021)*: Paragraph 6.1.26 Failure to complete the appropriate surveys may result in delays at the examination stage if additional information is required. The applicant should therefore adjust their application submission dates if necessary to ensure these surveys are fully completed.

Sections 5.3.47 – 5.3.49

We agree that this assessment should be carried out following the Welsh Government guidance given in the document “The Setting of Historic Assets in Wales”. To assist in this assessment we have identified the designated historic assets at Annex A which are in the ZTV and inside 5km of the development. We would expect a stage 1 assessment to be carried out for all these designated historic assets, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets. The results of the stage 1 assessment should be included as an appendix of the ES

Sections 5.3.50 – 5.3.52

The application area is not inside a registered historic landscape, therefore an ASIDOHL assessment is not required, instead the impact of the proposed windfarm should be carried out using the guidance given in “The Setting of Historic Assets in Wales”.

Yours sincerely

Laura Cooper
Casework Officer

Annex A

LIST OF DESIGNATED HISTORIC ASSETS AFFECTED BY THE PROPOSED GLANLLYNFI GARTH WIND FARM

Scheduled Monuments

Within the application area:

GM231 Clawdd Mawr, Mynydd Caerau

Within a 5km developer ZTV:

GM059 Y Bwlwarcau
GM085 Llangynwyd Castle
GM086 British Fortified Residence
GM092 Mynydd Ty Talwyn Ancient Farms
GM093 Mynydd Ty Talwyn Ancient Farms

GM118 Ffos Toncenglau cross ridge dyke
 GM232 Mynydd Caerau Round Cairns
 GM233 Crug yr Afan Round Cairn
 GM234 Bachgen Carreg Round Cairn
 GM243 Carn y Hyrddod & Neighbouring Cairn
 GM244 Nant Herbert Camp
 GM245 Cefn yr Argoed Camp
 GM249 Round Cairn 567m East of Bryn Defaid
 GM250 Croes y Bwlchgwyn Round Cairn
 GM278 Earthwork 360m NNE of Crug yr Avan
 GM330 Pebyll Ring Cairn
 GM340 Earthwork & Platform Houses N of Nant Fadog
 GM418 Maesteg blast furnaces
 GM433 Remains of Tondu Ironworks
 GM499 Round Barrow on the Werfa
 GM500 Bwlch y Clawdd Dyke
 GM538 Bryn Llydan Round Barrow
 GM539 Garn Bica
 GM540 Mynydd Ton Cairns
 GM552 Garth Hill Platform House
 GM557 Twmpath Diwlith Round Barrow
 GM564 Craig y Bwlch round cairn
 GM565 Tarren y Bwlch round cairn
 GM577 Carn Caglau cairn
 GM589 Plas-y-Betws relict garden

Registered Parks and Gardens

PGW(Gm)5(BRI) Bryngarw Grade II
 PGW(Gm)65(BRI) Coytrahen House Grade II

Registered Historic Landscape

HLW (WGI/MGI) 2 Margam Mountain
 HLW (MGI) 5 The Rhondda

Listed Buildings

11218	Cefn-ydfa farmhouse and adjoining ruins.	II
11243	Church of St Cynwyd	II*
11256	Llwydarth farmhouse	II*
11257	Maesteg Sports Centre, The Cornstores	II*
11329	Gelli-siriol farmhouse	II
11331	Iron bridge over River Llynfi	II*
11352	The Old House Inn PH	II
11353	Telephone call box in front of the Old House PH	II
11356	Siloh Independent Chapel	II
11367	Tabor Eglwys Presbyteriadd Cymru	II
11373	Pentre Farmhouse, with attached farm range.	II
11375	Gilfach-ganol farmhouse	II
14175	Gelli Farm	II

14559	Tyle-coch	II
18492	Blast Furnace at Maesteg Sports Centre	II
18493	Bethania Capel y Bedyddwyr Neillduol	II*
18494	Neuadd y Dref (Town Hall)	II
18495	Salem Welsh Baptist Chapel	II*
18496	Capel Saron	II
18497	Cenotaph	II
18498	North Company Offices	II
18499	Maesteg Council Offices, with flanking walls and piers. Church of St Michael and All Angels, Llangynwyd with	II*
18500	Maesteg, including enclosing graveyard wall.	II
18501	Zoar Chapel	II
18502	Church of St David, and surrounding churchyard railed wall.	II
18503	Colonel North Memorial Hall	II
18504	Post Office	II
18505	William Hopkin Thomas memorial Lamp and fountain.	II
18506	The Star Public House	II
18507	Nantyffyllon Workmen's Institute	II
18626	Church of St David, Bettws	I
18627	Bethania Capel y Bedyddwyr (Welsh Baptist Chapel)	II
18628	United Reformed Church including vestry wing Tabernacl Capel yr Annibynwyr (Welsh Independent)	II
18629	including vestry wing	II
18630	Former Cooperative Bakery	II
18631	Ffaldau Workmen's Institute and attached Billiard Hall	II
18632	Mortuary Chapel Monument to Benjamin and Elizabeth Noyle,	II
18633	Pontycymmer Cemetery	II
18634	Pontycymer Cemetery Entrance	II
18637	Ty Isaf	II
18638	Small Tramroad bridge over Nant Cedfyw, Shwt	II
20429	The Hopcyn Cross	II
20430	Two chest tombs on S side of the Church of St Cynwyd Group of five tombs S of the tower of the Church of St	II
20431	Cynwyd	II
20432	Bee boles and stile in garden wall at Gilfach-uchaf farm	II
20433	Ty'n-y-waun farmhouse	II
20434	Group of 4 Hopkin and Jenkins tombs within iron railings on the W side of the path to the S porch	II
20435	Group of nine memorials on the W side of the path to the S porch, Church of St Cynwyd	II
20436	Jenkins Monument in the churchyard, Church of St Cynwyd	II
20437	Churchyard walls around the graveyard, Church of St Cynwyd	II
20742	Cildeudy tunnel	II
20743	Pont-y-rhyd-ddu (partly in Garw Valley community) Walls flanking the inclined plane joining the Bettws	II
20744	tramway to the DLP Railway.	II
20746	Abutments to overbridge/ loading bay on the former	II

	Duffryn Llynvi and Porthcawl Railway	
	North portal and wings of the Rock-fawr Bridge on Sir	
20747	Robert Price's private tramway.	II
20763	Former Blast Engine Houses at Tondy Ironworks	II*
	Calcing Kilns and attached abutment at Tondy	
20816	Ironworks	II*
20817	Lift Tower at Tondy Ironworks	II*
22166	Jerusalem Baptist Chapel	II
22167	Kiln block at former Bryn Brickworks	II
23847	Gelli Farm Cottage	II
23848	Old longhouse at Nantfydw	II
23849	Stable at Nantfydw	II
23852	Bakehouse at Gelli Farm	II
23853	Barn and Cow House at Gelli Farm	II
23854	1 Gelli House	II
23855	2 Gelli House	II
23856	3 Gelli House	II
23857	4 Gelli House	II
23858	5 Gelli House	II
23859	6 Gelli House	II
23860	7 Gelli House	II
23861	8 Gelli House	II
23862	9 Gelli House	II
23863	10 Gelli House	II
23864	11 Gelli House	II
23865	12 Gelli House	II
87889	Catholic Church of Our Lady and St Patrick	II



Ref: DNS CAS-04687-J2G4Q0

Robert Sparey
Planning & Environment Manager
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

By Email: PEDW.Infrastructure@gov.wales

25th of March 2026.

Dear Robert Sparey,

Re: Scoping Direction Consultation Response – DNS CAS-04687-J2G4Q0. Proposed Glanllynfi Garth Wind Farm, Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl

Thank you for your letter dated 3rd of March 2026, seeking the Department's views on the above Scoping Direction request. Please find below our response, focusing on soil, peat resources, and agricultural land quality.

For the Department, the key issues likely to be significantly affected by the development are:

- The protection of peat soils, peatland habitats and the natural resources which underpin them.
- Maintaining soil services and functions
- Beneficial restoration and after use of site

1. Peat Soils and Peatland Habitats:

The presence of peat must be identified in order to comply with PPW when making spatial choices to locate proposed development and in development management decisions. Considering peat early in the site selection process is essential when deliberating the choice of site and then the subsequent siting of infrastructure and scheme design.

The Peatlands of Wales Evidence Score Map is the first step in gathering evidence to inform the applicants as to the likely presence and extent of peat within site search areas and specific

sites. The map notes a single, small area of potential peat deposit within the redline boundary (as noted in Section 5.7.11). This is not a proposed turbine location, however no information is provided at this point of other infrastructure types and locations proposed as part of the development (e.g. tracks). Achieving avoidance of peat soils and peatland habitats must be demonstrated through infrastructure design and placement.

The Peatlands of Wales map is not, and does not intend to be, a definitive representation of all peatlands in Wales. If developers are considering site search areas in upland, high rainfall areas of Wales, then it must be considered that peat soils may likely be encountered and will need detailed site-specific survey when evidencing site selection decisions and in scheme design/infrastructure placement proposals.

The Scoping report (Section 5.7.10 – 5.7.11) notes the potential to encounter peat soils on site which may overlap with proposed infrastructure locations.

Survey Requirements:

As a minimum, it is expected that proposals where peat soils and peatland habitats are a consideration include the following:

- i Initial Desk based assessment using the **Peatlands of Wales Evidence Score Map** and consideration of probability of peat deposits on a site.
- ii Probing / coring entire site on a 100m grid survey to at least 100 cm depth (often referred to as a 'Phase 1' survey). Assessments must include an adequate coring density to ensure that probing evidence accurately reflects the presence and depth of peat: coring and probing at a density greater than a 100 m grid may be needed to take account of variability in the presence and depth of peat (e.g. to identify smaller peat pockets in between grid sampling points). Map and peat survey data to be provided in ES, supplemented with Phase 1/NVC habitat map and infrastructure location map.
- iii In the event of possible infrastructure overlap or other impacts possibly arising from development, detailed peat survey (Phase 2) undertaken for all proposed locations, with sampling on the basis of a 10x10m grid survey within typical micro-siting allowances.
- iv Information expected to support the ES should include a peat map, to a detailed resolution, that clearly shows peat depth (with clear colour-coded representation of peat at assessment locations) and distribution, interpolation method, data, and confirmatory core logs. The ES should also provide, to a detailed resolution, overlaid maps of peat depth and distribution, NVC communities and sub-communities, habitats present (aligned to Section 7 list habitats) and infrastructure locations.
- v All habitat areas (by NVC community and Section 7 habitat) that may be lost or impacted (either directly or indirectly) should be clearly presented in the assessment. The Department expects clear data provided on volumes of peat excavated and/or compacted, together with area of NVC habitats on peat that are directly and indirectly impacted by the development.

Definitions:

The Department considers the definition of peat soils to be used is as published in the National Peatland Action Programme (NPAP) and noted below:

“Peat soils are defined by the Soil Survey of England & Wales (SSEW) as:

- more than 40 cm of (O horizon) material within the upper 80cm, excluding fresh litter (L) and living moss; or*
- more than 30 cm of organic (O horizon) material resting directly on the bedrock (R or Cr) or extremely stony material; and,*
- no overlying non-humose material mineral horizon that has a colour value of 4 or more and extends below 30cm depth.”*

The Department considers that:

- shallow peat soils (i.e. < 30 cm deep) supporting peatland habitat and / or integral to the hydrological functioning of wider peat bodies, either on site or adjoining, must be included for consideration along with the SSEW definition above.
- Peatland habitats are semi-natural habitats associated with both peat soils and shallow peat and listed under Section 7 of the Environment Act (Wales) 20169, with some examples given in footnote 129 (p. 149) of PPW 12. Paragraph 6.4.15 1a and 1b and 6.4.34 of PPW covers **all** areas of peatland habitat on both peat soils **and** shallow peat soils.

2. Soil Management Scheme (mineral, organo-mineral and peaty):

A soil management scheme should be prepared by the developer, informed by a baseline soil resources and physical characteristics report, and be considered as part of the ES process.

This should be a clear scheme and programme setting out how **all** soils (mineral, organo-mineral and peaty) and their functions will be conserved during construction, reinstated and at decommissioning.

The volumes of each peaty, organic or mineral soil unit that will be excavated for any on site infrastructure should be clear and based on survey evidence. For peat soils, the priority is avoidance.

For all infrastructure, information should be provided on the current condition of the site, sufficient to clearly demonstrate that resources are available to put in place the appropriate standard of reclamation.

The Scheme should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility, and should include: -

- Soil stripping programme - volumes and types of soils affected;
- Soil handling techniques and procedure;
- Size, location, construction, management and period of soil storage dumps;
- Proposed after use and restoration programme, including techniques and aftercare programme.

A detailed scheme will support the ES process in considering: -

- Reasonable alternatives considered for the proposal;
- Potential impacts of the development and demonstrate how the proposal will not have an unacceptable adverse impact on the environment (in this case the peatland and soil resource);
- The feasibility and how effective restoration and beneficial after use can be achieved;
- How the proposal will maintain the resilience of national natural resources and avoid the loss of function and services provided by the peatlands and soils.

Likely significant effects to soil function and services to be scoped into the assessment (mineral, organo-mineral and peat).

3. Agricultural Land Classification (ALC):

The Department does not hold any information on detailed ALC field surveys for the site. According to the Predictive ALC Map for Wales, the site is considered at best Grade 4 and 5 (as noted in Section 5.7.12 of the Scoping Report).

As per Departmental published guidance, detailed ALC field survey is not requested for the site, but may be beneficial in supporting baseline soil resources and physical characteristics information for the site. The Department does not consider Best and Most Versatile (BMV) agricultural land to be present on this site and therefore Planning Policy Wales (PPW) 12, paragraphs 3.58 and 3.59 would not apply.

Best and Most Versatile (BMV) agricultural land can be scoped out of the assessment.

4. Decommissioning:

The proposals should include a detailed scheme for site decommissioning that can be confidently conditioned against. This is essential to meet the requirements of Policy 18(11) of Future Wales in terms of acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. This is also key in assessing the impacts of the proposed development over its lifetime.

Decommissioning should be scoped in to the assessment.

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

Yours sincerely

Iwan Price
Soil, Peatland & Agricultural Land Use Planning
Welsh Government
Department for Climate Change & Rural Affairs
Landscapes, Nature & Forestry Division
LQAS@gov.wales

Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff CF10 3NQ

Eich cyf / Your ref DNS CAS-04687-J2G4Q0

Ein cyf / Our ref 26/SW-8008

30 March 2026

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

Glanllynfi Garth Wind Farm

The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation.

I refer to your consultation of 3rd March 2026 regarding the above planning application. The Welsh Government as highway authority for the Strategic Road Network (SRN) would request the following information is provided as part of a future planning application.

The Welsh Government would require detail 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. Please supply the full route to site, likely traveling weights and dimensions of AILs as well as swept paths of the worst case AILs at all potential horizontal and vertical constraints along the access route (as a minimum all SRN junctions will be required).

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 need the attached 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 would need best estimates for:

- Full route details.
- Vehicle weight
- Vehicle length
- Vehicle width
- Vehicle height

Without these details the route suitability cannot be confirmed.

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, noting we would expect the haulier to fully screen the route.

For your information below are our standard planning conditions (taken from the aforementioned PAG document attached), which would be included as part of any future planning application;

Structural assessment

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 to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

Condition surveys

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.

Liability for incidental damage

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 scheme shall be implemented as approved throughout the construction phase of the development.

Traffic Management Plan

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
- 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 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
- 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.

Highway works

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 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.

Road Safety Audit

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.

Section 278 Agreement

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 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.

If you have any further queries, please forward to the following Welsh Government Mailbox
Lgc_development_control-south@Gov.Wales

Yours faithfully

Rhodri Thomas



Trafnidiaeth
Llywodraeth Cymru
Parc Cathays
Caerdydd

Transport
Welsh Government
Cathays Park
Cardiff

Epost/Email: Lgc_development_control-south@Gov.Wales



Welsh Government Motorway and Trunk Road Network

‘Pulling Together’ Best Practice for Transporting Abnormal Loads in Wales

Instructions for use:

This guidance document is intended for use by hauliers and developers planning to generate abnormal load movements on Trunk Roads and Motorways in Wales.

It outlines the statutory process for planning and conducting safe and effective abnormal load movements in agreement with all relevant authorities and organisations.

This document supersedes any previous advice issued by the Welsh Government regarding this process.

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1 INTRODUCTION

1.1 Document purpose

Our highways are, in the most part, built to accommodate a certain maximum vehicle size and weight. These vehicle limits are defined and upheld by UK law and most daily movements can be completed within them. However, some particular vehicle types and indivisible freight loads fall outside these limits and so are known as 'abnormal loads'. These typically include:

- Vehicle carrying an oversize or overweight load
- Mobile cranes
- Engineering plant
- Road recovery vehicles

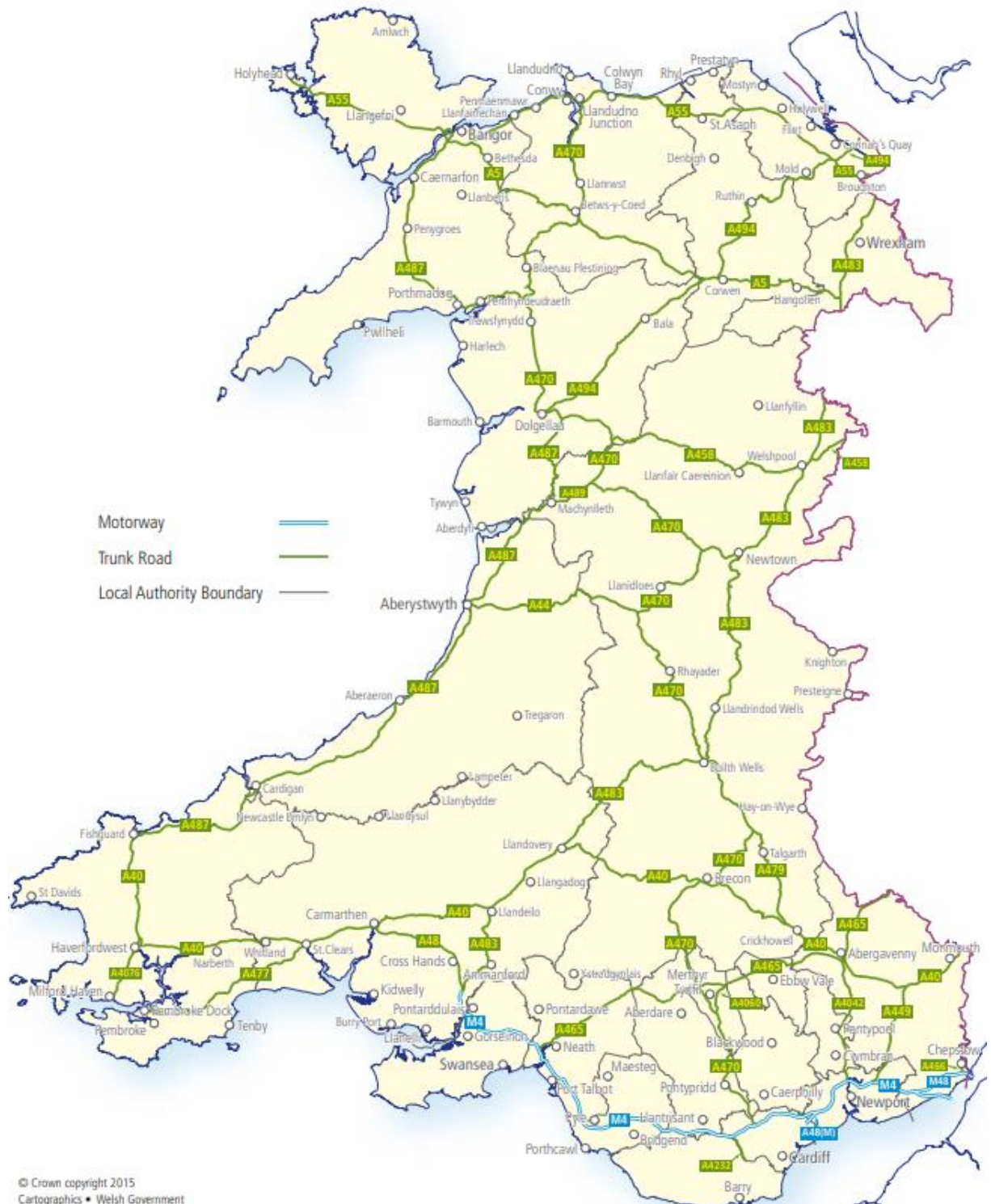


The movement of these types of loads by road is essential for supporting the UK economy, but it is also essential that the movements are carefully planned and executed to ensure they can be safely accommodated by the highway network. Movements of abnormal loads on the Welsh trunk road network (see Figure 1) can include vehicles as large as 8m wide, 55m long and 135te, while many thousand abnormal load movements take place in Wales every year. The consequences of these types of journeys being unplanned or poorly executed can therefore be significant, and include:

- Damage to the network when abnormally wide or heavy loads travel over weak structures or along narrow roads
- Delay to all road users if movement timing or route is poorly planned
- Harm to wider public if mismanaged movement results in an accident

- Delays and cost implications to industry when vehicles unable to complete journey on time

Figure 1 Trunk Road Network Wales (Traffic Wales, 2015)¹



¹ <https://traffic.wales/sites/default/files/2018-10/151021-wales-trunk-roads-map-en.pdf>

To avoid such impacts and their potential legal consequences, those responsible for transporting abnormal loads by road in the UK are required by law to plan and execute each movement in agreement with relevant authorities to ensure the incident-free passage of every load from origin to destination.

Welsh Government is the devolved government for Wales. The Welsh Ministers are the Highway Authority for trunk roads and motorways in Wales under the Highways Act 1980. They are supported by civil servant officials who work across devolved areas that include key areas of public life, including transport and the management of trunk roads and motorways.

This document therefore comprises a Welsh Government Procedure and Advice Guidance (PAG) document which aims to summarise the legal process which must be followed in the planning and execution of all abnormal load movements on trunk roads within Wales and to clarify the roles and responsibilities of the various parties involved.

By pulling together, we make roads in Wales safer and more effective.

1.2 Document structure

The document is structured as follows:

- The legal definition of an abnormal load is discussed in Section 2
- Guidance on vehicle preparation is provided in Section 3
- Guidance on journey preparation is provided in Section 4
- Planning for abnormal loads through the development control process is outlined in Section 5
- A summary of roles and responsibilities is presented in Section 6, and
- A list of useful contacts is provided in Section 7

1.3 Intended audience

This document is primarily addressed at the party responsible for conducting an abnormal load movement on Welsh trunk roads (most commonly the haulier), but is relevant to all parties involved in its safe planning and execution, as follows:

- Consigners/agents
- Hauliers
- Attendants
- Escorting services

- Police
- DVSA
- Highway Authorities and other bridge owners
- Planning authorities
- Developers / agents or consultants
- Statutory utilities

1.4 List of abbreviations

The following abbreviations are used throughout this document:

- AIL – Abnormal Indivisible Load
- ALO – Abnormal Loads Officer
- AWR – Road Vehicles (Authorised Weight) Regulations 1998
- STGO – The Road Vehicles (Authorisation of Special Types) (General) Order 2003
- C&U – The Road Vehicles (Construction and Use) Regulations 1986
- DBFO – Design, Build, Finance, Operate companies
- DMRB – Design Manual for Roads and Bridges
- HA&BO – Highway Authorities and other Bridge Owners
- NH – National Highways (*previously Highways England*)
- DVSA – Driver and Vehicle Standards Agency
- LA – Local Authority
- NMWTRA – North and Mid Wales Trunk Road Agent
- SWTRA – South Wales Trunk Road Agent
- TAA – Technical Approval Authority
- TMP – Traffic Management Plan
- TTRO – Temporary Traffic Regulation Order
- WG – Welsh Government

2 CATEGORIES OF ABNORMAL LOAD

Abnormal loads, and the obligations of those moving them, are defined in the UK by legislation. This section provides a summary of the different legal categories of abnormal load and their implications.

2.1 Normal vehicle definition

The maximum size and weight of vehicles which can use the UK road network without journey notification having to be provided to relevant authorities is defined by the following regulations:

- The Road Vehicles (Construction and Use) Regulations 1986 – “C&U”
- Road Vehicles (Authorised Weight) Regulations 1998 – “AWR”

These permit a vehicle and its load to use UK roads without notification as long as the combination falls within the following maximum size and weight limits:

- Rigid length: up to 18.65m
- Width: up to 2.9m
- Weight: up to 44,000kg
- Axle load: up to 10,000kg (or 11,500kg for single driving axle)

If a vehicle and its load lie outside any of these limits, it is referred to as an abnormal load.

There is no legal height limit for vehicles but, wherever possible, the overall height of a vehicle and load should not exceed 4.95m so that the maximum use can be made of the motorway and trunk road network. This will ensure that loads are less than 5.03m in height, which is the minimum maintained headroom requirement on UK highways.

2.2 Categories of abnormal loads

Legal categories of abnormal load vary to cover different combinations of vehicle size and weight. This is because different types of abnormal load have implications for both:

- Vehicle choice, and
- Route choice

The implications in each case are considered in the following subsections.

2.2.1 Abnormal loads and vehicle choice

The size of an abnormal load has implications for the size of the transporting vehicle, with larger loads generally requiring larger vehicles.

In addition, heavier loads put greater demands on a vehicle's chassis, suspension, tyres, brakes and engine, so heavier abnormal loads also require a higher specification of vehicle.

These distinctions between the impacts of size and weight result in the following abnormal load vehicle legal categories:

- C&U/AWR compliant vehicles are permitted within that legislation to carry oversized abnormal indivisible loads up to a limit, but not overweight loads
- Overweight loads, and those beyond C&U size limits, can be carried by three categories of higher specification vehicles designed to standards prescribed by The Road Vehicles (Authorisation of Special Types) (General) Order 2003 ("STGO") and are subject to lower speed limits depending on load weight
- Loads heavier and/or larger than those permitted by STGO require Special Order approval by the UK Secretary of State under Section 44 of the UK Road Traffic Act 1988

The application of these categories to abnormal load sizes and weights is summarised in the following table.

Table 1 Abnormal load legal category by size/weight combination

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	C&U	C&U	STGO Category 1	STGO Category 1	Special Order
>44,000kg	≤11,500kg	STGO Category 1	STGO Category 1	STGO Category 1	STGO Category 1	Special Order
>50,000kg	>11,500	STGO Category 2	STGO Category 2	STGO Category 2	STGO Category 2	Special Order
>80,000kg	>12,500	STGO Category 3	STGO Category 3	STGO Category 3	STGO Category 3	Special Order
>150,000kg	>16,500kg	Special Order	Special Order	Special Order	Special Order	Special Order

Key: = Abnormal load legislation

This table highlights that:

- C&U vehicles are limited to carrying abnormal loads which are oversized but not overweight
- STGO categories increase with abnormal load weight up to 150,000kg
- Special Order vehicles are for extra heavy and/or very large abnormal loads

2.2.2 Abnormal loads and route choice

As well as vehicle type implications, abnormal loads also present route choice implications, as follows:

- The wider and longer a load, the greater the potential for conflict with other road users and roadside furniture / structures
- The heavier a load, the greater the potential for damage to underlying infrastructure and for delays to other road users due to slower speeds

The transporting of abnormal loads therefore presents increased road safety, infrastructure damage and traffic management risks to the network which need careful management and mitigation in liaison with relevant authorities. This is required by legislation covering abnormal load movements and the following table summarises:

- The organisations requiring pre-trip notification of the abnormal load journey details, and
- The minimum notification period in each case, where 'd' refers to working days (excluding Sundays and Bank Holidays) and 'w' refers to weeks

Table 2 Pre-journey notification requirements by abnormal load category

Gross weight	Axle weight	Load Dimensions				
		W <=2.9m L <=18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
<=44,000kg	<=11,500kg	N/A	Police – 2d			
>44,000kg	<=11,500kg	HA&BO – 2d	Police – 2d HA&BO – 2d		Police – 2d HA&BO – 2d NH – 2w	
>50,000kg	>11,500					
>80,000kg	>12,500	Police – 2d HA&BO – 5d			Police – 2d HA&BO – 5d NH – 2w	
>150,000kg	>16,500kg					

Key:  = Abnormal Load legislation  = VR1 form notice  = C&U
 = STGO C1  = STGO C2  = STGO C3  = Special Order

HA&BO = Highway Authority and other Bridge Owners NH = National Highways

This table highlights that:

- Where just load size increases, only the Police require notification, until the size reaches such that HA&BOs and National Highways require notifying also
- Conversely, where just load weight increases, HA&BOs require notification, until the weight reaches such that the Police and National Highways require notifying also
- For combinations of size and weight increases, both the Police and HA&BOs need notifying, together with National Highways for the largest/heaviest loads
- In all cases, the minimum notification period increases with load size and weight
- For loads over 5m wide, UK Secretary of State approval must be sought through submission of a VR1 form²

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/471962/VR1_form.pdf

- For loads over 6.1m wide, UK Secretary of State approval must be sought through submission of a Special Order form³

The approval of VR1 and Special Order forms has not been devolved by the UK Government to Welsh Government and so currently remains the responsibility of National Highways. However, for Special Order movements which will result in trips on the Welsh trunk road network, and for any other abnormal load movement deemed applicable, Welsh Government may require a Traffic Management Plan (TMP) to be submitted for approval before the proposed journey date. TMP requirements are defined in Section 4.1 below.

VR1 and Special Order load movements should also be planned with due cognisance of Highway England's 'Water preferred policy guidelines'⁴ which require such journeys to be completed as far as possible by either inland or coastal waters wherever it is practical, economic and environmentally desirable to do so.

2.3 Summary

UK law defines abnormal load categories based on the degree of vehicle and route preparation required in each case to ensure a smooth and safe movement, with preparation requirements increasing with load size and weight.

Further guidance on vehicle and route preparation is provided in the following two sections.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503102/BE16_form_revised_Sept_15.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

3 VEHICLE PREPARATION

Ensuring that an abnormal load vehicle meets legal requirements and is fit-for-purpose is essential for ensuring safe and reliable journeys. This short section is not intended to cover all legal matters relating to abnormal load vehicle preparation but summarises key requirements that contribute to safe movements through Wales.

3.1 Vehicle choice

Where the carrying of a load causes the vehicle and load to lie outside of normal C&U/AWR size and/or weight limits, the party responsible for its transportation is legally required to divide the load into smaller components wherever possible, except where this would involve undue expense or risk of damage.

Assuming the load cannot be further subdivided and so is considered an abnormal indivisible load, the selected vehicle must comply with the legislation applicable to the dimensions and weight of the combination, as set out in Table 1 above.

3.2 Signage, markings and lighting

It is both a legal requirement and best practice to clearly sign, mark and light an abnormal load vehicle to ensure the visibility of vehicle size and extremities for other road users. For a summary of requirements and best practice, refer to the following documents:

- 'Special types enforcement guide', by Gov.UK⁵
- 'Lighting and marking for abnormal loads vehicles code of practice', by National Highways⁶

3.3 Attendants

Both C&U and STGO legislation require that an attendant travel with the vehicle where:

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it is 3m or less but the length of any lateral projection of a load carried on it exceeds 305mm.

⁵ <https://www.gov.uk/government/publications/lighting-and-marking-for-abnormal-loads-vehicles-code-of-practice>

⁶ <https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide#abnormal-loads>

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it exceeds 3.5m where a rigid unit and any projection of the load exceeds 18.75m in length.
- Special types combination exceeds 25.9m, the length of any forward projection of the load exceeds 2m, the length of any rearward projection of the load exceeds 3.05m.

Where attendants are required on special types vehicles and three or more vehicles are involved travelling in convoy, attendants need only be carried in the first and last vehicles of that convoy.

The attendant's duty is to warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road and to ensure road signs and notices are complied with.

3.4 Documentation

If UK Secretary of State approval is required and obtained for the journey via either a VR1 or Special Order form, the approval documents must be carried in the vehicle during the approved journey as the means of demonstrating authorised exemption from C&U/AWR regulations.



4 JOURNEY PREPARATION

The key to an effective and safe abnormal load journey is good preparation in liaison with relevant authorities, as required by legislation and by this document. This section provides guidance on the journey planning and notification process.

4.1 Notification requirements

4.1.1 Authorities to be notified

As summarised in Table 2 above, the relevant authorities who require notification of abnormal load movements may include:

- Police
- Highway authorities and other bridge owners
- National Highways

In Wales, highway authorities comprise:

- Local authorities for non-trunk roads, and
- Welsh Government for trunk roads (with functions delegated to NMWTRA/SWTRA and DBFO companies)

Bridge authorities/owners most commonly comprise:

- Local authorities for non-trunk road structures
- Welsh Government for trunk road structures (with functions delegated to NMWTRA/SWTRA and DBFO companies)
- Network Rail for rail bridges
- Canal and River Trust for canal bridges

4.1.2 Notice periods

Notification to relevant authorities must be provided before any abnormal load journeys take place. The minimum notification periods for each authority are summarised by abnormal load category in Table 2 above. Depending on the type of abnormal load, this shows that:

- Each Police force area traversed by the route must be given at least 2 to 5 days' notice

- Each HA&BO area traversed by the route must be given at least 2 to 5 days' notice
- If VR1 form approval is required, National Highways must be given at least 2 weeks' notice
- If Special Order approval is required, National Highways must be given at least 10 weeks' notice

Where a Temporary Traffic Regulation Order is required, it should be noted that this can also take up to 12 weeks to process (see Section 4.3.1.3 below for more information).

The reason for requiring minimum notification periods is to allow due time for notified authorities to assess the proposed journey and for applicants to satisfactorily address any issues raised before the journey takes place. More information on the notification assessment process is provided in Section 4.3 below, but it should be noted that notified journeys can only legally take place:

- If all relevant authorities are notified with sufficient notice period and either no response is received before the journey date or any response received before the journey date is addressed by the applicant to the satisfaction of the responding authority, and
- In the case of VR1 or Special Order movements, explicit written approval is received

In addition, where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

It is important to note that notifications which do not satisfy the legal minimum notice periods will generally not be accepted by authorities unless a movement is required as part of a genuine emergency and the notification is accompanied by a telephone call. Equally, notifications can be submitted earlier than the minimum notice period, while pre-notifications and consultations with authorities are also encouraged where there is uncertainty about whether a journey notification would be accepted.

4.1.3 Information required

4.1.3.1 Statutory notification requirements

The level of notification information required depends on the category of abnormal load being moved, with information requirements increasing with movement size and/or weight. A summary of requirements per movement category is provided in the following table.

Table 3 Information required by notification type

Information	C&U	STGO	VR1	Special Order
List of authorities notified	☒	☒	☒	☒
Operator details	☒	☒	☒	☒
Movement route, time and date	☒	☒	☒	☒
Description of load	☒	☒	☒	☒
Vehicle type and registration	☒	☒	☒	☒
Vehicle dimensions and laden weight	☒	☒	☒	☒
Axle weights and spacing		☒		☒
Proof of current indemnity to HW&BO		☒		
More detailed journey information			☒	
More detailed vehicle and load information				☒

4.1.3.2 Traffic Management Plan requirements

Where a TMP is required to be submitted to Welsh Government (see sections 2.2.2 and 4.1.2), the following journey details should be provided:

1. 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
2. Loaded dimension and weight of AIL
3. Anticipated escort arrangements
4. Methodology for managing trunk road traffic during journey, including identification of passing places and holding areas as necessary
5. Journey contingency plans in the event of incidents or emergencies
6. Estimated journey duration and timings along the route
7. Evidence of trial run that mimics the movement of the AIL along the access route where appropriate, at the discretion of the Highway Authority
8. Swept path analysis modelling at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
9. Proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed and reinstated

4.1.4 Notification submission

All relevant notification and indemnity forms can be found on the Gov.UK website⁷ which can be emailed, faxed or posted to relevant authorities.

However, it is recommended that an online notification portal is used to submit C&U and STGO abnormal load notifications. The standard UK system is ESDAL⁸, maintained by National Highways, which allows users to:



- Plan an appropriate route according to vehicle size and weight
- Notify all relevant Police, highway authorities and other bridge owners of the planned journey
- Get advance notice of any possible route problems
- Save vehicle details and routes for future use

Subject to the preferences of individual authorities and Police forces, other online notification portals can also be used, but the applicant should satisfy themselves that any system employed satisfies all legal requirements for making abnormal load journey notifications.

The TMP, if required, should be submitted to the Welsh Government ALO, as detailed in Table 7 below.

4.1.5 Notification dispensations

Dispensations may be issued by Police to hauliers to move abnormal loads through their area without prior notification if they satisfy the following requirements:

- Abnormal loads no wider than 3.5m
- Multiple loads of a like nature on a regular basis
- Routes limited to motorways and selected A roads only

The granting of a dispensation has the potential to significantly reduce the number of notifications hauliers will have to submit. However, the dispensation should reference specific vehicles in the fleet and so are not transferable without prior notice to the Police. Drivers should also carry a copy of the dispensation and present it to an officer on request. Dispensations must be renewed annually on application and are not automatically renewed.

⁷ <https://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms>

⁸ <https://www.gov.uk/esdal-abnormal-load-notification>

Any dispensation granted will not take account of any roadworks commencing during the dispensation period or ongoing at the point of issue and hauliers will still be expected to check their route.

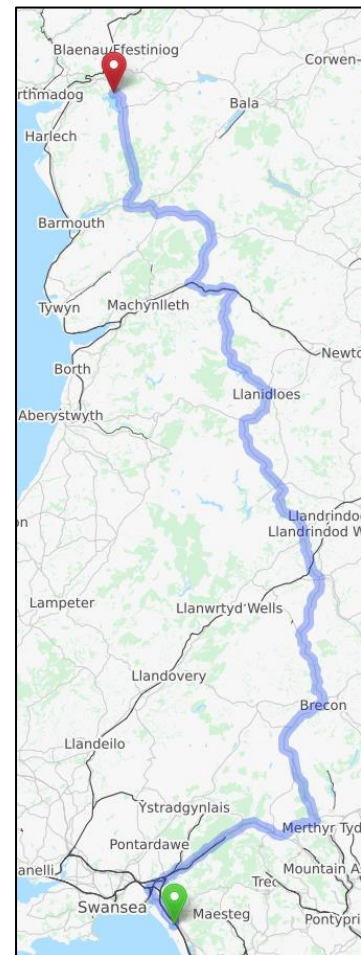
4.2 **Route planning guidance**

4.2.1 **General principles**

It is ultimately the haulier's responsibility to identify a route and execute a journey which ensures the legal, safe and least disruptive passage of an abnormal load from trip origin to trip destination. Relevant authorities will provide guidance and, where necessary, require journey amendments, but the legal responsibility and liability for the safe completion of each journey lies with the haulier.

In selecting an appropriate route for inclusion in an abnormal load journey notification, the following general principles should be followed:

- Routing preference should always be given to using the highest classification roads, with as much of the journey as possible being routed along motorways, trunk roads and A-roads. These routes are best equipped to carry large and heavy loads, and are least likely to present size and weight restrictions (the busiest abnormal load routes on the Welsh trunk road network typically include the A55, A494 dual carriageway, A483 dual carriageway and the A5 near Chirk)
- Routes should also avoid passing through population centres wherever possible to minimise conflict with both infrastructure constraints and other road users
- Routes must avoid roads presenting size and/or weight restrictions which fall within the parameters of the vehicle/load combination being transported
- One key advantage of using online journey notification systems like ESDAL is that it allows users to plot a route based on vehicle size and weight based on mapping which contains information on network size and weight restrictions.



Potential applicants should also be aware of Ordnance Survey 'Mastermap Highways Network' products which allow point-to-point route planning and contains a comprehensive and continuously updated national database of:

- Road classification and name
- Height, weight, width and length restrictions
- Turn restrictions
- Access restrictions
- Locations of bollards and traffic calming
- Narrow roads and pinch points
- Maintenance responsibility

In addition, it is recommended that applicants consider potential planned roadworks at the route planning stage using the online resources detailed in Section 4.4.1 below.

In combination with online notification portals, hauliers therefore now have access to route planning tools which maximise the chances of both successful abnormal load notifications and successful abnormal load journeys.

4.2.2 Other considerations

4.2.2.1 Travel timing

In planning an abnormal load route, the following timing related factors should also be considered:

- Journey times which exceed statutory driver working time limits will require a stopping place to be identified along the route which can accommodate abnormal load vehicles
- Journey distances which require vehicle refuelling will require a fuel station to be identified along the route which can accommodate abnormal load vehicles
- During hours of darkness, most Police forces only allow abnormal load movements to take place on motorways and on some lit dual carriageways. Journeys on all other road types which cannot be completed during daylight hours will therefore need to be routed via an abnormal load layby where layover can take place
- Some authorities will not allow abnormal load movements through their area or parts of their area during peak traffic hours. This can affect both route choice and journey timing

For planning stops and/or refuelling, National Highways publish on the Gov.uk website a list⁹ and map¹⁰ of laybys and motorway service stations which can accommodate abnormal loads.

In calculating journey times, typical congestion on the planned day of travel should be taken into account, as well as the speed limit applicable to the abnormal load vehicle type. STGO loads are speed limited by category and road type. The most common categories are limited as follows:

Table 4 STGO speed limits by category and road type

STGO category	Speed limit		
	Motorway	Dual carriageway	Other roads
Category 1 (width ≤ 4.3m)	60mph	50mph	40mph
Category 1 (width > 4.3m) & Categories 2 & 3	40mph	35mph	30mph
Special Order ¹¹	20mph	20mph	20mph

Source: Special Types Enforcement Guide

4.2.2.2 Escort considerations

Consideration should also be given during route planning as to whether either a private or Police escort is required to accompany the abnormal load movement.

There is no legal requirement for a vehicle moving under STGO or a Special Order to be accompanied by an escort vehicle, but National Highways advises that the following dimensions may be applied to decide if the movement of an abnormal load requires an escort:

Table 5 National Highways guidelines on escort requirements

Abnormal load measurement	Motorway	Other
Width	>4.6m	>4.1m
Length	-	>30.5m
Weight	130t	100t

Source: Lighting and marking COP for abnormal load self escorting vehicles, National Highways

The above measures are for guidance and may differ between individual Police forces who may wish to vary these requirements. The final decision rests with the Police (see Section 4.3.1.2 below).

See the full National Highways Code of Practice¹² for further details on escorting abnormal load movements.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494606/Location_of_Abnormal_Load_Laybys_-_1143.pdf

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494607/Lay-by_and_MSA_Map_-_1143.pdf

¹¹For girder frame trailers over 150 tonnes and draw-bar trailers over 250 tonnes, the limit is 12mph

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

4.3 Notification processing

4.3.1 Police notification assessment process

4.3.1.1 Public Safety Risk Assessment

In processing an abnormal load journey notification, the primary concern of the Police is to assess the potential impact of the journey on public safety. The relevant duty officer within the Police will therefore check the notification and carry out a risk assessment based on the agreed 'risk category' levels set out below:

- Low risk notifications – no necessity for further action. General advice provided to the haulier and information on control measures if necessary.
- Medium risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered medium risk.
- High risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered high risk.

Based on this risk assessment, the Police forces may reject or amend any time, date or route that they consider may have an impact on public safety. If a route is deemed unsuitable, the haulier will be notified and will then be responsible for identifying an alternative route or additional traffic management measures sought from local authorities, National Highways or the Police.

4.3.1.2 Escort requirements

If the risk assessment determines that the safety of road users may be compromised to an unacceptable extent, an escort may be specified regardless of the vehicle dimensions specified in Table 5 above. The haulier will therefore be responsible for provision of an escort vehicle which conforms to the type specified by National Highways.

As per ACPO guidance, Police escorts will only be provided if specifically requested by a haulier or if the risk assessment identifies the need for temporary road closures to ensure safe passage of the load through restricted sections of the route. A minimum of 8 days notice will be required for a Police escort. If necessary, charges for Police escorts will be incurred by the haulier at 'Special Policing



Services' rates. For journeys where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

4.3.1.3 Temporary Traffic Regulation Order

If the risk assessment identifies the need for a temporary road closure on any section of the route, the haulier will be required to apply for a Temporary Traffic Regulation Order (TTRO) under the Road Traffic Regulation Act 1984 to allow officers and other Accredited Persons¹³ to stop and direct moving traffic or to suspend on-street parking. Applications for TTROs on the non-trunk road network should be made through the relevant local authority, and through NMWTRA/SWTRA for trunk road applications.

Hauliers should be advised that TTROs can take up to 12 weeks to process.

4.3.2 HA&BO notification assessment process

In processing an abnormal load journey notifications, the primary concern of highway authorities and other bridge owners is to assess the potential impact of the journey on highway structures.

4.3.2.1 Check for height and width restrictions

On receipt of a notification or notification enquiry, the Abnormal Loads Officer (ALO) for each of the affected HA&BOs will use details of the vehicle configuration to undertake audit checks of known height and width restrictions at structures along the route, and any other known structural constraints (temporary or permanent). Alternative routes or configurations may be suggested to avoid any identified structural constraints.

The ALO may request the haulier or enquiring party provides horizontal and/or vertical swept path analysis as necessary, based on topographical survey data. If the submitted swept path analysis is considered inadequate, the ALO may request the haulier or enquiring party undertakes a trial run to mimic the movement of the abnormal load vehicle through the constraint. The trial run vehicle should demonstrate the extent of the load envelope in terms of width and height in a clearly visible manner using a collapsible template. It should be noted that this may require a Police escort.

If the ALO is not satisfied that the constraint can be negotiated by the load, the HA&BO shall inform the haulier or enquiring party, as well as other relevant authorities as appropriate, that the load cannot be moved. WG can also implement Permanent or Temporary Traffic Regulation Orders under the Road Traffic Regulation Act 1984 to limit the maximum gross vehicle weight on a structure if required.

¹³ The Police Reform Act allows DVSA and other agencies to use Policing Powers to be able to replace officers at planned events, under the provisions of the Community Safety Accreditation Scheme (CSAS), as long as they are "employed" by the Accredited Agency to do so.

4.3.2.2 Check for structural capacity

On receipt of a notification or notification enquiry, the ALO will undertake checks referring to existing structural certification along the notified route, in consultation with the HA&BO's structures team if necessary, based on the loading and vehicle configuration.

If checks identify structures which may not be able to carry the load, the haulier may suggest an alternative route which will then need to be submitted to the relevant HA&BO for approval.

Further checks will be undertaken if an alternative route cannot be found. This will be undertaken by the ALO or a structural engineer. If these checks identify structures which would not be able to carry the load, the haulier may propose alternative vehicle configurations until a suitable configuration is found.

If neither a suitable route nor suitable vehicle configuration can be found and the HA&BO rejects the proposal to move on this basis, then the haulier may commission the assessment of route structures by a suitably qualified and experienced consultant at their own expense. All load assessments require Technical Approval according to BD2, 'Technical Approval Of Highway Structures'¹⁴. WG are the Technical Approval Authority (TAA) for Trunk Roads in Wales.



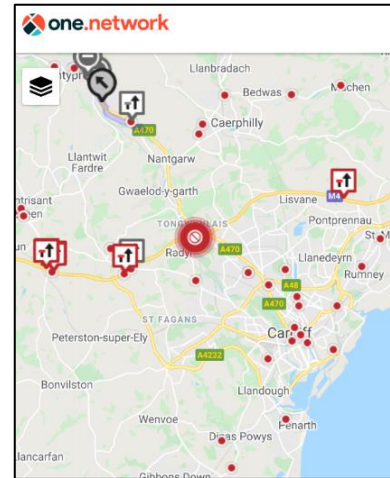
¹⁴ <https://www.croftse.co.uk/wp-content/uploads/2018/04/BD2-12-Highways-Structures-Approval.pdf>

4.4 Post-notification considerations

4.4.1 Roadworks and disruptions

The haulier should check for roadworks and disruptions along the route on the day of travel before commencing an agreed journey. Roadworks can particularly affect the passage of wide loads, and national details of live roadworks can be checked at <https://one.network/> or at <https://traffic.wales/> (also see Section 7 for Traffic Wales' contact details).

The haulier should consult in advance with the relevant ALO and the party responsible for the works if there is any doubt about whether the works affect the agreed route for the journey.



In the event where roadworks make the agreed route impassable, an agreement should be reached with the party responsible for the works to make passage possible at an agreed time, if feasible.

If not feasible, or if an unforeseen disruption makes a section of the agreed route impassable, the haulier is expected to assess where it is most appropriate and safe to park up and to contact the Police. If there are no safe areas then traffic management may be required to safely control traffic around the abnormal load vehicle. In addition to Police contact details, all hauliers are also recommended to carry contact details of the relevant local highway authorities and national traffic management firms to aid swift action in case of such an event.

4.4.2 Enforcement considerations

Once in transit, abnormal load vehicles can be subject to enforcement checks by either Police or DVSA officers. The vehicle may be escorted to a safe stopping place if any of the following conditions are met:

- Police have not received notification of movement
- Notification of movement is invalid due to inaccuracies
- Movement is not taking place in accordance with approved notification or authorised amendments
- Abnormal Indivisible Load vehicle or load is incorrectly marked or lit
- Abnormal Indivisible Load vehicle does not have the required attendant

- Abnormal Indivisible Load vehicle does not have the escort vehicle required by Police
- Driver is currently committing a 'driving hours' offence under tachograph regulations or will have committed an offence before reaching next stopping point
- Driver is currently committing an 'insufficient rest' offence under tachograph regulations
- Any C&U offences not exempted by STGO 2003 are evident

Where non-compliance is evident, the driver and operator are liable to prosecution under C&U regulations. Penalties for non-compliance can range from a fine¹⁵ to the temporary restriction or suspension of the haulier's operating licence by the Traffic Commissioner for Wales¹⁶. Officers might also prevent onward travel of the vehicle until any areas of non-compliance are adequately addressed.

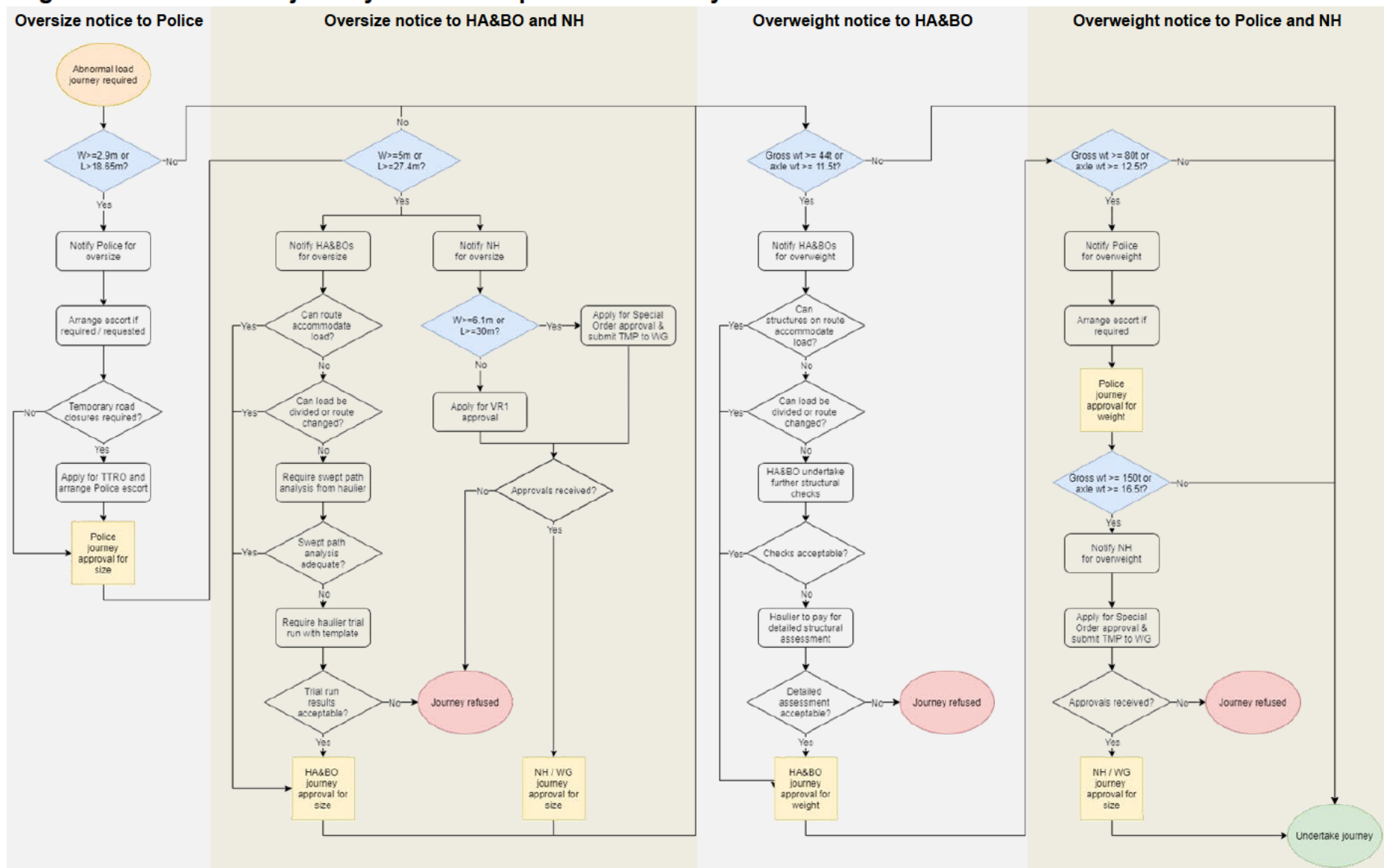
4.5 Process summary

A summary of the main steps in the legally required notification process is shown in the following figure.

¹⁵ <https://www.gov.uk/government/publications/guide-to-graduated-fixed-penalties-financial-deposits/dvsa-roadside-checks-fines-and-financial-deposits>

¹⁶ <https://www.gov.uk/traffic-commissioner/decision-and-penalties>

Figure 2 Abnormal load journey notification process summary



5 ABNORMAL LOADS AND DEVELOPMENT CONTROL

5.1 Planning applications

Planning applications for developments which are likely to generate abnormal load movements, either during construction or operation, may be required to be submitted with a Transport Assessment in accordance with Welsh Government Planning Policy Technical Advice Note 18: Transport¹⁷ Regarding abnormal load movements, the Transport Assessment should identify:

- Estimated movement volumes of abnormal loads to and from the site
- The most appropriate abnormal load routes to and from the site
- Mitigation proposals where necessary for route to safely accommodate load

Failure to demonstrate that the site can be safely accessed by the loads it will generate can be grounds for refusal of planning permission.



5.2 Planning conditions

Where planning permission is granted for a development which will generate abnormal load movements on the Welsh trunk road network, the following planning conditions will be attached.

¹⁷ <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

5.2.1 Structural assessment

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 to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

5.2.2 Condition surveys

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.

5.2.3 Liability for incidental damage

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 scheme shall be implemented as approved throughout the construction phase of the development.

5.2.4 Traffic Management Plan

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
- 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 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

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.

5.2.5 Highway works

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 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.

5.2.6 Road Safety Audit

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 119¹⁸. 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.

5.2.7 Section 278 Agreement

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 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

¹⁸ <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/6.%20Transport%20and%20Engineering/DMRB/vol5/section2/hd1915.pdf>

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 1980¹⁹.

5.2.8 Access onto the trunk road

Full details of the highway works associated with the proposed new access onto the trunk road shall be submitted by the applicant to WG, as the Welsh trunk road highway authority, prior to the commencement of any works on the development site. Details of proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction and drainage.

The visibility splays shown on the submitted plans of the proposed new access onto the trunk shall at all times be kept free of any planting, tree or shrub growth, or any other obstruction in excess of 1.05m above the adjoining carriageway.

All highways works shall achieve full compliance with DMRB.



¹⁹ <https://gov.wales/sites/default/files/publications/2018-04/109-18-section-38-184-and-278-agreements-under-the-highways-act-1980.pdf>

6 SUMMARY OF ROLES AND RESPONSIBILITIES

The roles and responsibilities for each party set out in this document are summarised in the following table.

Table 6 Summary of roles and responsibilities of parties involved in abnormal load movements

Party	Role	Responsibilities
Consigners/agents	Generating/commissioning abnormal load movement	Commissioning of fully compliant haulier for planning and executing abnormal load movements. Preference should be given to hauliers with FORS accreditation (see https://www.fors-online.org.uk/cms/)
Haulier	Preparing and executing abnormal load movement	- Planning subdivision of loads wherever possible to avoid need for abnormal load movements (see Section 3.1) - Ensuring selected vehicle complies with the legislation applicable to the dimensions and weight of the combination (see Table 1) - Ensure vehicle and load is clearly signed, marked and lit according to regulations (see Section 3.2) - Ensure attendants accompany vehicle if required (see Section 3.3) - Carry VR1 or Special Order documents in vehicle where applicable (see Section 3.4) - Notify relevant authorities of abnormal load journey with sufficient notice period, including a Traffic Management Plan if required (see Section 4.1.2) - Address and, if necessary, pay for any requirements emerging from notification assessment process (see Section 4.3) - Undertake/procure structural assessment if required (see Section 4.3.2.2) - Accommodate for roadworks and disruptions on day of travel (see Section 4.4.1) - Execute journey according to approved notification (see Section 4.4.2) and, where applicable, to approved Traffic Management Plan (see Section 2.2.2)
Abnormal load attendant	Accompanying abnormal load on journey where required	- Accompany abnormal load vehicle for full journey where legislation requires - Warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road (see Section 3.3)
Abnormal load escort	Escorting abnormal load on journey where required	- Comply with National Highways guidance in vehicle preparation and abnormal load escort protocol (see Section 4.2.2.2) - Comply with any specific instructions provided by Police (see Section 4.3.1.2)
Police	Assessing public safety impacts of abnormal load notifications, escorting where required and enforcing regulations in transit	- Undertake public safety risk assessment for all abnormal load notifications (see Section 4.3.1.1) - Advise haulier with sufficient notice if any amendments required to notified journey or if notification refused (see Section 4.3.1.1) - Advise haulier with sufficient notice if private or Police escort required and if TTRO required (see Section 4.3.1.2 and 4.3.1.3) - Resource the Police escort, as required (see Section 4.3.1.2) - Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
DVSA	Vehicle standards, licencing and enforcement	Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
HB&BOs	Assessing infrastructure impacts of abnormal load notifications	- Assess relevant journey notifications in terms of capacity of route infrastructure to accommodate proposed abnormal load dimensions and weight (see Section 4.3.2) - Advise haulier if journey notification is rejected or approved (see Section 4.3.2 Error! Reference source not found.)
Planning authorities	Determining planning applications for abnormal load generating developments	- Ensure planning applications consider abnormal load trip generation and demonstrate suitable routeing and, where necessary, mitigation (see Section 5.1) - Apply planning conditions where necessary to ensure abnormal load routes are fully planned and approved and that all journeys are undertaken according to an approved Traffic Management Plan (see Section 5.2)
Developers	Seeking planning consent for abnormal load generating developments	- Submit Transport Assessment with planning application to identify abnormal load trip generation, suitable routeing and, where necessary, mitigation (see Section 5.1) - Discharge planning conditions, where applicable, by ensuring abnormal load routes are fully planned and approved and by committing to all journeys being undertaken according to an approved Traffic Management Plan (see Section 5.2)

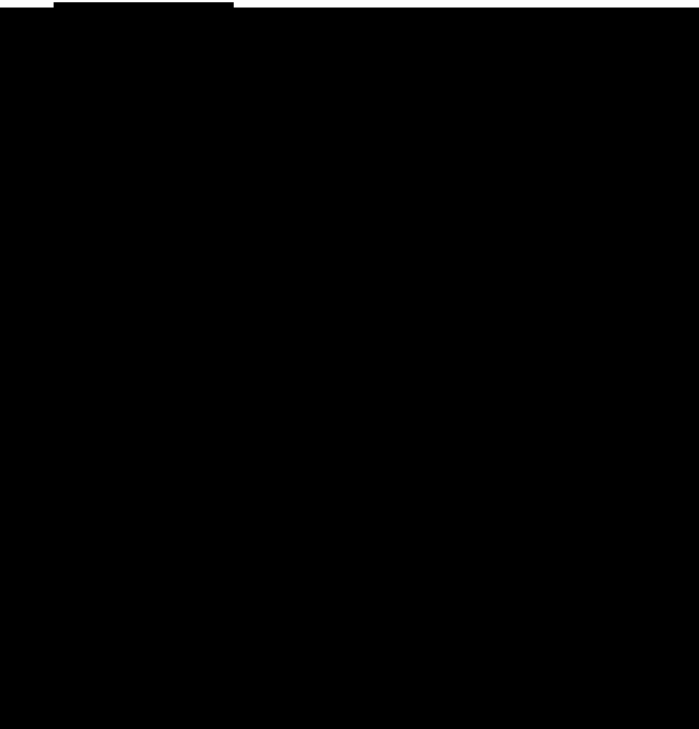
7 USEFUL CONTACTS

The process outlined in the above sections requires input from and contact with a number of organisations in order to ensure all relevant authorities are notified, and that abnormal load movements occur safely and without causing disruption to the network.

The following table provides a list of key contacts and contact details for queries associated with the movement of abnormal loads in Wales.

Table 7 Useful contacts for abnormal load related queries

Organisation	Contact details
Welsh Government ALO	[REDACTED]
Dyfed-Powys Police	[REDACTED]
Gwent Police	[REDACTED]
North Wales Police	[REDACTED]
South Wales Police	[REDACTED]
NMWTRA	[REDACTED]
SWTRA	[REDACTED]
Traffic Wales	[REDACTED]
National Highways Abnormal Loads Tea	[REDACTED]
Network Rail Abnormal Loads Team	[REDACTED]
Blaenau Gwent County Borough Council	[REDACTED]
Bridgend County Borough Council	[REDACTED]
Caerphilly County Borough Council	[REDACTED]
Cardiff City & County Council	[REDACTED]
Carmarthenshire County Council	[REDACTED]
Ceredigion County Council	[REDACTED]
Conwy County Borough Council	[REDACTED]
Denbighshire County Council	[REDACTED]
Flintshire County Council	[REDACTED]
Gwynedd County Council	[REDACTED]
Isle of Anglesey County Council	[REDACTED]

Organisation	Contact details
Merthyr Tydfil County and Borough Council	
Monmouthshire Council	
Neath Port Talbot County Borough Council	
Newport City Council	
Pembrokeshire County Council	
Powys County Council	
Rhondda Cynon Taf County Borough Council	
Swansea Council	
Torfaen County and Borough Council	
Vale of Glamorgan Council	
Wrexham County Borough Council	

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Sent: 23 March 2026 15:58

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Subject: RE: Ymgynghoriad Llunio AEA | EIA Scoping Consultation - DNS CAS-04687-J2G4Q0 - Fferm Wynt Glanllynfi Garth | Glanllynfi Garth Wind Farm [SG41083]

Our Ref: SG41083

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

The logo for NATS, consisting of the word "NATS" in a bold, blue, sans-serif font.

NATS Safeguarding

E: natssafeguarding@nats.co.uk

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

Gwasanaeth Tân ac Achub
De Cymru



South Wales
Fire and Rescue Service

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ
PEDW.Infrastructure@gov.wales

Our Ref: DL/99-15038 (BR12)
Your Ref: DNS CAS-04687-J2G4Q0
Date: 04 March 2026
Contact: Station Manager D. Lijertwood
Tel: [REDACTED]
E-mail: [REDACTED]

Dear Sir/Madam,

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

PROPOSAL: THE PROPOSED DEVELOPMENT IS TO CONSTRUCT AND OPERATE A WIND FARM OF UP TO EIGHT TURBINES (WITH A MAXIMUM BLADE TIP HEIGHT OF 180 M) AND ASSOCIATED INFRASTRUCTURE INCLUDING ACCESS TRACKS AND SUBSTATION.

LOCATION: LOCATED BETWEEN DYFFRYN, MAESTEG AND GARTH AND BLAENGARW PONTYCYMER AND PONTY-Y-RHYL

I acknowledge receipt of the notification to the South Wales Fire and Rescue Authority ("The Authority") in relation to the above application.

The proposed site plan in relation to the above has been examined by The Authority and the following standing advice is given at this stage:

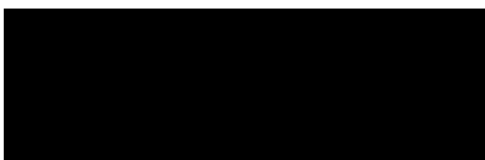
The developer should carefully consider the need for the provision of: -

- a. adequate water supplies on the site for firefighting purposes; and
- b. access for emergency firefighting appliances

Further comments will be made at full Town & Country application stage.

Yours faithfully,

Duly signed and authorised by



for Assistant Chief Fire Officer

Enc: BR12 Appendix

Pencadlys Gwasanaeth Tân ac Achub De Cymru,
Parc Busnes Forest View, Llantrisant, Pont-y-clun, CF72 8LX.

Ffôn 01443 232000 • [REDACTED]

www.decymru-tan.gov.uk

Rydym yn croesawu gohebiaeth yn y gymraeg a'r saesneg - byddwn yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich dewis iaith heb oedi.

CODI YMWHYBYDDIAETH - LLEHMUSRYG

South Wales Fire and Rescue Service Headquarters,
Forest View Business Park, Llantrisant, Pontyclun, CF72 8LX.

Telephone 01443 232000 • [REDACTED]

www.southwales-fire.gov.uk

We welcome correspondence in Welsh and English - we will respond equally to both and will reply in your language of choice without delay.

BEING AWARENESS - REDUCING RISK

BR12 Appendix

1.0 Access for Fire Appliances

Typical vehicle access route requirements:

<u>Appliance Type</u>	<u>Min Width Road</u>	<u>Min Width Gate</u>	<u>Min Turning Circle between Kerbs</u>
Pump	3.7m	3.1m	16.8m
Aerial Appliance	3.7m	3.1m	26.9m

	<u>Min Turning between Wall</u>	<u>Min Height Clearance</u>	<u>Min Capacity Tonnes</u>
Pump	19.2	3.7m	18
Aerial Appliance	29.0	4.0m	24

Pedestrian Priority

Pedestrian schemes must consider the need for permanent and unobstructed access for firefighting appliances. The siting of ornamental structures such as flower beds, must take account, not only of the access requirements of the fire appliances but the need to be able to site them in strategic positions; in particular, account must be taken of the working space requirements for aerial appliances. Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure adequate access for fire appliances, their siting and use.

2.0 Water Supplies for Firefighting

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to cater for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Access to Open Water Supplies

Where development of waterfront sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

3.0 **Conclusion**

Developers should engage in early, collaborative discussions with Dŵr Cymru Welsh Water, **Natural Resources Wales (NRW)**, and the Fire and Rescue Authority to ensure that adequate water supplies are available for firefighting purposes.

The Fire and Rescue Authority reserves the right to require the provision of static water supplies on-site as a condition of planning consent where existing water supply infrastructure is insufficient to address the assessed fire risk. This approach aligns with current national guidance and legislation, including the:

- **Well-being of Future Generations (Wales) Act. 2015,**
- **Building Regulations Approved Document B (Fire Safety 2019)**
- **British Standard BS 9990:2016 Non-automatic firefighting water supplies.**



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru
Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

Craig Flannery

Y Pencadlys, Lôn Pisgwydd,
Caerfyrddin, Sir Gâr, SA31 1SP
post@tancgc.gov.uk | tancgc.gov.uk

Headquarters, Lime Grove Avenue,
Carmarthen, Carmarthenshire, SA31 1SP
mail@mawwfire.gov.uk | mawwfire.gov.uk

0370 60 60 699

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Gofynner am/
Please ask for:

Watch Manager A. Thicker

Rhif Est/Extn. No.

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My Ref:

AT/KDT/00217240

Dyddiad/Date:

05 March 2026

Dear Sir / Madam,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMENDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

RE: The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation – Glanllynfi Garth Wind Farm, Located between Dyffryn, Maesteg and Garth, and Blaengarw Pontycymer and Ponty-y-Rhyl

REFERENCE NUMBER: DNS CAS-04687-J2G4Q0

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan(s) of the above proposal has been examined, and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development.

- The Fire Authority has no comment to make on access for fire appliances or water supplies.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links:

<https://www.water.org.uk/national-guidance-document-provision-water-firefighting>

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg
- byddem yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich
dewis iaith heb oedi.
Rydym yn croesawu galwadau yn y Gymraeg a'r Saesneg.

We welcome correspondence in Welsh and English -
we will respond equally to both and will reply in your
language of choice without delay.
We welcome calls in Welsh and English.

100% wedi'i ailgylchu | recycled

EIN GWELEDIGAETH

I ddarparu'r Gwasanaeth gorau posibl i
gymunedau canolbarth a gorllewin Cymru.

OUR VISION

To deliver the best possible service for
the communities of mid and west Wales.

#eichgtacgc

#yourmawwfrs

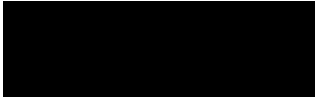


Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru
Mid and West Wales
Fire and Rescue Service

Furthermore, the applicant should be advised to contact the appropriate Authority responsible for ensuring safety and compliance for these types of developments i.e., Health & Safety Executive / Local Authority Building Control.

The plan(s) has been retained for record purposes.

Yours faithfully



Watch Manager A. Thicker
Authorised Fire Safety Inspector
On behalf of the Mid and West Wales Fire and Rescue Authority

Encs.

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg
- byddwn yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich
dewis iaith heb oedi.
Rydym yn croesawu galwadau yn y Gymraeg a'r Saesneg.

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We welcome correspondence in Welsh and English -
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EIN GWELEDIGAETH

I ddarparu'r Gwasanaeth gorau posibl i
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OUR VISION

To deliver the best possible service for
the communities of mid and west Wales.

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MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres



High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.



1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

From: Rob Elias [REDACTED]
Sent: 03 March 2026 15:56
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Subject: RE: Ymgynghoriad Llunio AEA | EIA Scoping Consultation - DNS CAS-04687-J2G4Q0 - Fferm Wynt Glanllynfi Garth | Glanllynfi Garth Wind Farm

Good Afternoon Rob,

Thank you for sharing the details for the scoping of this potential development - DNS CAS-04687-J2G4Q0 - Fferm Wynt Glanllynfi Garth | Glanllynfi Garth Wind Farm.

Having shared the details with our Air Traffic Control General Manager, and given the location of the proposed development, it is recommended that the developer arranges for a Preplanning Technical and Operational Assessment (TOPA) - this will confirm whether the proposed development would have any potential Technical or Operational impact upon the radar and/or Air Traffic service operations at Cardiff Airport. Please see below link to the NATS website which gives details of how the developer can request a TOPA assessment: [Wind farm pre-planning assessment - Wind farm services - NATS](#).

Once the developer has the results of the TOPA, it will allow them to understand whether further engagement is necessary with both Cardiff Airport/NATS if it is confirmed that there would be any impact upon the Cardiff radar and/or Air Traffic Control operations and/or NATS from an en-route perspective.

Thank you

Rob Elias

Head of Airfield Operations
Pennaeth Gweithrediadau Maes Glanio

cardiff airport 
maes awyr caerdydd



Cardiff Airport, Vale of Glamorgan, Wales, CF62 3BD
Maes Awyr Caerdydd, Bro Morgannwg, Cymru, CF62 3BD



Defence Infrastructure Organisation

Kathe Kirimaa
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: CAS-04687-J2G4Q0

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Our reference: DIO10070372

www.mod.uk/DIO

Robert Sparey
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ
KY7 5LT

30 April 2026

By email only

Dear Robert,

Town and Country Planning Act 1990

The Developments of National Significance (Procedure) (Wales) Order 2016

Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

Potential DNS Application: Glanllynfi Garth Wind Farm

Site Address: Located between Dyffryn, Maesteg and Garth and Blaengarw Pontycymer and Ponty-y-rhyl

Proposed Development: The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation.

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Request for the proposed Glanllynfi Garth Wind Farm.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that MOD has concerns with the proposal.

The proposal includes the erection of up to 8 wind turbines, each with a maximum height to blade tip of 180 metres above ground level (agl). The development has been assessed using the location

data (Grid References) provided in 'Glanllynfi Garth Wind Farm EIA Scoping Report', dated February 2026.

Turbine no.	Easting	Northing
T1	286782	193133
T2	287425	192976
T3	286685	192693
T4	288422	189841
T5	289446	189945
T6	288914	190379
T7	288694	189429
T8	287380	192525

The principal safeguarding concern of the MOD with respect to this development is the erection of a wind turbine and relates to the potential of the turbine creating a physical obstruction to air traffic movements.

Physical Obstruction

In this case the development falls within Low Flying Area 7 (LFA 7), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above terrain features 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 that conditions are added to any consent 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.

The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

Summary

The principal safeguarding concerns of the MOD with respect to this wind farm relate to the potential for the development to create a physical obstruction to air traffic movements.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's documents titled 'Appendix A Figures', 'Site Location Plan', dated December 2025, Glanllynfi Garth Wind Farm EIA Scoping Report', dated February 2026 and "One Sheet' Summary'. 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.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

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

Yours sincerely,

Kathe Kirimaa

Kathe Kirimaa
Assistant Safeguarding Manager

From: Joint Radio Company [REDACTED]
Sent: 05 March 2026 13:09
To: PEDW – Seilwaith / Infrastructure <pedw.infrastructure@gov.wales>
Subject: Re: Glanllynfi Garth Wind Farm - DNS CAS-04687-J2G4Q0

If any details of this proposal change, particularly the position or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

Dear Robert,

Planning Ref:

DNS CAS-04687-J2G4Q0

Name/Location:

Glanllynfi Garth Wind Farm

Site Centre/Turbine(s) at NGR:

1 - 286782	193133
2 - 287425	192976
3 - 286685	192693
4 - 288422	189841
5 - 289446	189945
6 - 288914	190379
7 - 288694	189429
8 - 287380	192525

Development Radius:

0.1km

Hub Height: 105m **Rotor Radius:** 75m

This proposal is **cleared - subject to 50m Micrositing** - with respect to radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms (and other developments) on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy (or other) development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm (or other development) change, particularly the disposition or scale of any turbine(s) or structure(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom



JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC | Joint Radio Company | JRC](#)

09 March 2026

APPLICATION DETAILS: DNS CAS-04687-J2G4Q0

PROPOSED DEVELOPMENT: Proposed 8 x WTG with tip height of 180m

LOCATION: Glanllynfi Garth Wind Farm – See Annex A

Response by Arqiva

We refer to the above request and thank you for the opportunity to comment.

Arqiva is responsible for providing the transmission network for the BBC & ITV along with the majority of the UK's radio companies and is responsible for ensuring the integrity of Re-Broadcast Links. Tall infrastructure such as wind turbines and other tall structures have the potential to block radio transmission links and rebroadcasting links (through direct blocking of radio signal or deflecting signal). Our radio transmission networks normally operate with a 100m buffer either side of a radio link, free from interference by a tall development.

Arqiva do not assess the potential impact of tall buildings & wind turbines on the domestic reception of television and radio services. We would recommend that the developer undertakes its own reception survey to understand the potential for interference to television and radio reception, and consideration is made for a planning condition requiring the developer to mitigate the impact of any degradation of television and radio reception caused by tall buildings & wind turbines, similar to many other wind turbine and wind farm schemes.

We have reviewed the proposed development to evaluate any potential impact on our operations and can confirm that, in its current configuration, we have no concerns. Structure T7 is the closest element, situated approximately 850 metres northeast of our nearest RBL link path.

Please keep us informed of any amendments to the layout so that we may undertake a further impact assessment as required.

If you would like to discuss this matter further, please make contact via our email inbox

Yours sincerely
Keith Waudby
Principal Microwave Engineer

Annex A – Turbine Locations

Turbine	OSGB coordinates (m)		Hub height	Rotor diameter	Tip height
	X	Y			
T1	286782	193133	105m	150m	180m
T2	287425	192976	105m	150m	180m
T3	286685	192693	105m	150m	180m
T4	288422	189841	105m	150m	180m
T5	289446	189945	105m	150m	180m
T6	288914	190379	105m	150m	180m
T7	288694	189429	105m	150m	180m
T8	287380	192525	105m	150m	180m

Dear Robert

Thank you for your email dated 3 March 2026 consulting HSE on the Proposed Glanllynfi Garth Wind Farm - Development of National Significance (DNS).

Please note HSE is a statutory consultee for Developments of National Significance in Wales. For Significant Infrastructure Projects in Wales, HSE is not currently a statutory consultee, responses are therefore provided on a non-statutory, advisory basis.

Please find HSE's advice below.

HSE's Land Use Planning Advice (CEM HD5 Contribution)

1. With reference to the redlined Site Boundary shown on Figure 1.1 Site Location Plan found in [<https://planningcasework.service.gov.wales>, Reference: DNS CAS-04687-J2G4Q0 - Glanllynfi Garth Wind Farm] there are areas of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s):
 - a. 2 Feeder Rhigos / Dyffryn Clydach [HSE ref: 11877, Transco ref: 1636] – National Gas
2. The redlined area does not currently fall within the consultation distances of any Major Accident Hazard Installation(s).
3. 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).
4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, the HSE reserves the right to revise its advice.

5. 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.

Would Hazardous Substances Consent be needed?

6. 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 Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.
7. 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.
8. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Regards

NSIP Consultation Team

Shirley Rance | Business Support Team

Health and Safety Executive | Chemical, Explosives and Microbiological Hazards
Division

NSIP.Applications@hse.gov.uk



**PROTECTING PEOPLE
AND PLACES**

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Date: 23/03/2026
Our Ref: PPA0009986

Dear Sir/Madam,

Grid Ref: 288563 193278

Site Address: Glanllynfi Garth Wind Farm, Located between Dyffryn Maesteg and Garth, Bridgend

Development: DNS - The proposed Development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure.

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

APPRAISAL

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

I refer to your consultation documents received in accordance with Article 9(3) of the Development of National Significance (Procedure) (Wales) Order 2016, for a Development of National Significance (DNS CAS-04687-J2G4Q0) for the construction and operation of a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation at Glanllynfi Garth Wind Farm, Located between Dyffryn, Maesteg and Garth, Bridgend.

We welcome the opportunity to comment on the proposal and would offer the following standing advice which should be taken into account within any future application:

It appears the application does not propose to connect to the public sewerage system, and therefore Dŵr Cymru Welsh Water has no objections in principle.

However, should circumstances change and a connection to the public sewerage system or public sewage treatment works be preferred, we must be re-consulted on this application. Please note that the site is crossed by several public sewers and lateral drains. It is the developer's responsibility to ensure their proposal does not conflict with these underground assets. We strongly advise the developer to contact Dŵr Cymru Welsh Water at the earliest opportunity to confirm the location and status of our apparatus and to discuss any necessary consents. Some public sewers and lateral drains may not be shown on our maps because they were originally privately owned and transferred into public ownership under the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. Under the Water Industry Act 1991, Dŵr Cymru Welsh Water has rights of access to its apparatus at all times.

Turning to surface water drainage, as of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. In the event this proposed development amounts to a total impermeable area of 100sqm or more, approval of Sustainable Drainage Systems (SuDS) features will be required in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with Bridgend County Borough Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. We acknowledge that the proposal does not intend to communicate surface water flows to the public sewerage system and therefore offer no objection in principle. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation. The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWERAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

We acknowledge a water supply for this proposed development will not be required. However, should circumstances change, please contact our Developer Services Team on 0800 917 2652.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Furthermore, having reviewed the site location and information available to us, we would also advise that the site does not fall within our drinking water catchment. It is important to note that the site is crossed by multiple watermains prior to works it is recommended that the developer contact our Plan and Protect team (PlanandProtect@dwrcymru.com) to carry out a survey to verify the location of this asset and establish its relationship to the proposed development. Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.

FURTHER CONTACT

If you have any questions about the above response, please contact Amy Marshall who is the Development Planning Officer for Bridgend at developer.services@dwrcymru.com or on 0800 917 2652. They will be happy to assist you further.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Matthew Lord
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
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Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.



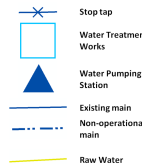
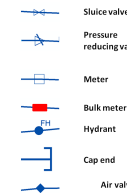
Dŵr Cymru
Welsh Water

PPA0009986 Water Main Plan



LEGEND

Clean network:



NB: Water main symbol colour indicates the type.
LIGHT BLUE - Trunk
DARK BLUE - Distribution
YELLOW - Raw Water

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre (PF)) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dŵr Cymru Cymyngedig (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The user of this information is advised to exercise caution and any excavations made without on site. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 105 and 109 of the Water Industry Act 1991 which in cases opens the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or discharge pipe and any associated apparatus, but before 1 September 1992, or if they do, the particulars thereof including the position underground may not be accurate. It must be understood that the furnishing of this information is solely without prejudice to the provisions of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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Map Ref: 286600,191609
Map scale: 1:3200
Printed by: Jeremy Hackman
Printed on: 23 Mar 2026



Dŵr Cymru
Welsh Water

PPA0009986 Water Main Plan 2



LEGEND

Clean network:	Sluice valve	Stop tap
Pressure reducing valve	Water Treatment Works	
Meter	Water Pumping Station	
Bulk meter	Existing main	
Hydrant	Non-operational main	
Cap end	Raw Water	
Air valve		

NB: Water main symbol colour indicates the type.
LIGHT BLUE - Trunk
DARK BLUE - Distribution
YELLOW - Raw Water

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dŵr Cymru Cŵrnydd (The Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The user of the information is advised to carry out any excavations made entirely on their own. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 105 and 109 of the Water Industry Act 1991 which in no way opens the liability of the Company or its officers, directors, employees or agents in any way. The Company is not liable for any loss or damage caused by the use of the information. It should be noted that the accuracy of the information is not guaranteed and the Company is not responsible for any loss or damage caused by the use of the information. It should be noted that the accuracy of the information is not guaranteed and the Company is not responsible for any loss or damage caused by the use of the information.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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Map Ref: 289296,197576
Map scale: 1:3200
Printed by: Jeremy Hackman
Printed on: 23 Mar 2026

Planning and new development

What you should do, and how we can help





Whether you're a homeowner with plans to extend your home, a builder working on a new house or a developer working on a new housing site, you need to involve us in the planning process. Even if you are just thinking about building, getting us involved early can help your project run smoothly and address any water and drainage matters as early as possible in the development process.

How can we help?

As water and waste services are at the forefront of public health and protection of the environment, we play a key part in the town and country planning process.

If you're planning on building new houses, our team of dedicated planning officers can give you advice and guidance at all stages of the process, including pre-application, planning application and discharge of condition.

When it comes to your new development, by getting us involved in the planning stages, we can:

- Assess whether the current local water and sewerage networks have capacity to service your new site (and if they can't, then identify whether the network can be reinforced to support your new site)
- Mitigate any potential negative impact that the new development could have on the performance of our infrastructure, the service we provide to customers, and the wider environment
- Identify where new development and growth is planned so that we can target investment in our existing infrastructure within these areas
- Provide advice on making new water and waste connections to our networks once your development is complete and ready to be occupied
- Identify any existing water or waste pipes in or near to the site, so we can advise on their location and let you know your options for protecting and/or diverting our assets for the lifetime of the development





Step 1: Use our pre-planning service

What is our pre-planning service?

We encourage all developers to engage with us as early as possible to ensure any water and drainage matters that might arise during the planning process are identified and addressed early on. In order to facilitate this, you can engage with us via our dedicated pre-planning service, which will provide:

- An assessment of the impact of your proposed development and whether our local water and waste networks can support it
- Confirmation of whether off-site water mains and/or sewers will need to be provided, and
- Water main and sewer plans indicating the location of our assets crossing the site or located in close proximity. *Please note that these are for general guidance only and all assets need to be accurately located on site before any excavation works begin.*

How can I access it?

You can submit a 'pre-planning advice' application online via our website. To make sure that we can provide you with the most comprehensive advice, you should include the following information:

- Site location plan
- Details of the proposed development
- Proposed points of communication to our local network of sewers and/or water mains (if known)
- Relevant planning history relating to the site e.g. any previous permissions granted or status within the council's development plan

You can see how much this service will cost on our website, and we'll aim to get back to you with a written **response within 21 days** of your application. The advice provided will be valid for 12 months and help inform our response when consulted on your planning application by the local planning authority (LPA).

For larger developments in Wales:

- You have to undertake pre-application consultation as set out in Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 for any developments that:
 - Include 10 dwellings or larger
 - Have 1000sqm or larger non-residential floor space or
 - Have a site area that's 1 hectare or larger
- This means you need to consult with us and we will **respond within 28 days**.
- While there's no charge for this service, as it's a statutory requirement, we do recommend that you apply for our pre-planning service in advance of this consultation, as it will help to identify any potential issues that need to be addressed in advance of your planning application.





Step 2: Once you have our pre-planning advice



Locate our assets

Before you build, it's important to identify if any of our pipes, water mains or sewers are underneath the ground in or adjacent to your development site. Under section 159 of the Water Industry Act 1991, we have the rights of access to inspect, maintain, adjust, repair or alter any asset or apparatus at all times.

If your land does contain assets

If your land does indeed contain some of our assets, then this will have an impact on the layout and general arrangement of the new development site. We strongly recommend that you contact us to discuss accurately locating our assets to ensure that they are protected during and after construction. Please contact our Plan and Protect team via planandprotect@dwrcymru.com or 08009172652 to discuss further.

If you want to divert or remove the assets contained in your land

If you decide the asset located within or adjacent to your site can't be incorporated within the layout of the new development, or our rights of access to the asset may be hindered by your proposal, you can ask us to alter, divert or remove it in accordance with section 185 of the Water Industry Act 1991. You can find the application forms on our website.

How will you manage surface water?

As with all new development sites, you'll need to think about how to deal with surface water runoff from any new buildings and hard standings. Legislation in both England and Wales now actively encourages the use of sustainable urban drainage systems (SUDS). This approach manages surface water runoff by imitating natural drainage systems and retaining water on or near the site.

There are such a variety of SUDS techniques including green roofs, rainwater harvesting and permeable pavements that any development should be able to include a SUDS scheme. There would need to be good justification not to incorporate a SUDS scheme on your site.

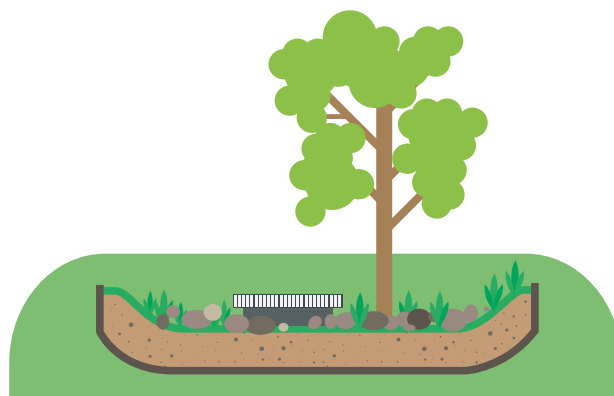
SUDS in Wales

All new development of more than one building or a construction area of 100m² or more will require consent from the sustainable drainage system (SUDS) approval body (also known as a SAB) for any new SUDS features, as required by Schedule 3 of the Flood and Water Management Act 2010. SABs are delivered by local authorities across Wales.

In accordance with this and the Welsh Government 'Statutory standards for sustainable drainage systems', you need to explore and fully exhaust all surface water drainage options, using discharge to a combined sewer only as a last resort.

SUDS in England

Even if your new development is based in England, it's important to keep Part H of the 'Building Regulations 2000' in mind. On this basis, all new developments in England will also be expected to consider surface water management techniques and demonstrate all technical options have been explored and exhausted, in liaison with the land drainage authority and/or the Environment Agency. You need to consider the management of highway or land drainage runoff as these flows won't be allowed to discharge directly or indirectly into the public sewerage system.



Step 3: The planning application process

Once you've used our pre-planning service and identified any potential issues before building, it's time to incorporate our advice into your proposals to your local planning authority (LPA).

As part of the planning application consultation process we will provide similar advice to that provided in our pre-application **response within 21 days**. It's important to note that while we share our expert opinion during this process, the ultimate decision to grant planning permission is the LPA's.

What are the options if we can't currently support your development?

Network hydraulic modelling/WwTW feasibility studies

As our aim is to support economic development and growth, we do not want to resist new development where possible. However, we must take the capacity of our existing assets, the service we are providing to existing customers and the environment into account. In areas where there are capacity constraints either on our networks or at the wastewater treatment works (WwTW), we may well already have proposals in place to deliver reinforcement works and to create capacity for new developments.

That being said, you may want to develop your site in advance of us undertaking these works. If this is the case, to ensure there's no detriment to our existing customers, you may be required to implement solutions identified by an assessment of either the network or WwTW. It's important to note that you won't be expected to resolve any existing operational issues.

Where further assessments are recommended, you will need to allow sufficient time in your development programme for these studies to be carried out and any reinforcement works to be delivered, as in some circumstances we won't permit a communication to our networks until these works are completed. The delivery of the works will need to align with occupation rather than construction.

Where possible, we will control the delivery of any solutions as part of the planning process. Dependent on the progress of the assessment, we may be in a position to recommend appropriate planning conditions so that the outcomes of the assessment can be delivered as part of any planning permission.

This approach allows us to support the progression of the site through the planning process, however in the absence of a completed assessment and known solutions we may need to work with you and the LPA until the assessment is completed and the outcomes are known.

Step 4: Connecting to our network

If you've had the green light from us and planning permission has been granted for your development, then it's time to start thinking about the different ways you'll need to connect to our network.

On our website you can find detailed guidance around applying for new water connections, new water mains, new public sewers and new sewer connections.

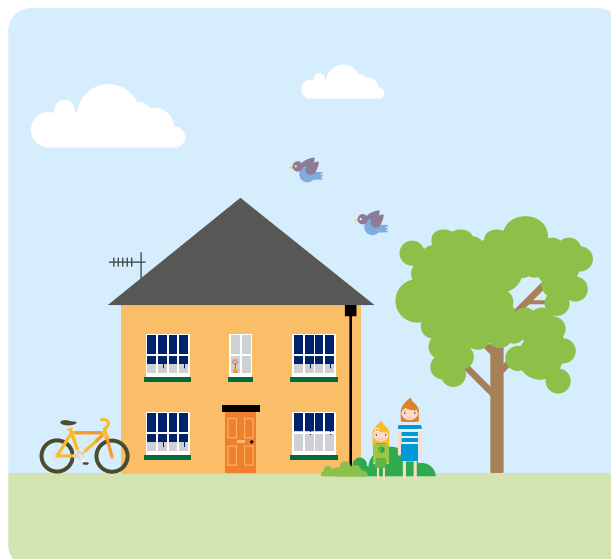
Contact us

If you've still got any questions or queries, then feel free to contact us:

Email: developer.services@dwrcymru.com

Visit: www.dwrcymru.com

Tel: 0800 917 2652





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@dwrcymru



/dwrcymruwelshwater



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Mr R Sparey - Planning & Environment Manager
Planning and Environment Decisions Wales

[By email: PEDW.Infrastructure@gov.wales]

26th March 2026

Dear Mr Sparey

Re: DNS CAS-04687-J2G4Q0 Glanllynfi Garth Wind Farm - The proposed development is to construct and operate a wind farm of up to eight turbines (with a maximum blade tip height of 180 m) and associated infrastructure including access tracks and substation- Located between Dyffryn, Maesteg and Garth and Blaengarw, Pontycymer and Pont-y-rhyl

Thank you for your notification of the 3rd March 2026 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Glanllynfi Garth Wind Farm site area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

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 our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The EIA Scoping Report, dated February 2026 and prepared by WSP, includes at 5.7 a section on Ground Conditions. This section of the report acknowledges the presence of coal mining features and the potential risks they pose.

The authors of the Scoping Report note that information on historical mining has already been considered in the proposed development layout presented for Scoping. They comment that due to the former mining activity on the site, and the presence of Development High Risk areas, a Coal Mining Risk Assessment (CMRA) will be produced to support the planning application.

We are pleased to see that ground conditions proposed to be included in the ES and we will be pleased to review the submitted CMRA in due course.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published for consultation purposes. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.

SP Energy Response

Thank you for the below consultation.

Please note that the proposed development is outside the SP Manweb licence area and no comments will be made.

Regards

Steve