



RWE Renewables UK Swindon Ltd.

Pen March Wind Farm

Design and Access Statement

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1 INTRODUCTION

1.1 Background

RWE Renewables UK Swindon Ltd. (hereafter ‘the Applicant’) is proposing to construct and operate Pen March Wind Farm (hereafter ‘the Proposed Scheme’) which would be located north of the A465 Heads of the Valleys Road, north-west of the small town of Rhymney and north-east of Merthyr Tydfil. The Site location and boundary are shown on **Figure 1**.

The Applicant is seeking to secure full planning permission for the Proposed Scheme by way of an application made pursuant to section 62D of the Town and Country Planning Act 1990 and subsequent regulations including the Developments of National Significance (Wales) Regulations 2016 (as amended)). The application will be made to the Welsh Government by submitting an application to Planning Environment Decisions Wales (PEDW). The Proposed Scheme will be a DNS as the wind turbines will have a combined installed capacity of greater than 10 megawatts (MW). Any proposal to construct or operate a power generation scheme with a capacity greater than 10 MW falls within the DNS system and requires Welsh Ministers’ consent.

The Proposed Scheme exceeds the threshold for onshore wind developments set out in Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (henceforth referred to as the EIA Regulations) and hence this project is defined as a major infrastructure project of which requires a Design and Access Statement to accompany the Environmental Statement and DNS application.

The Proposed Scheme comprises the construction and operation of up to six wind turbines with a maximum blade tip height of up to 180 m and associated infrastructure. The majority of the Development Site is registered as Common Land and makes up part of Common Land Unit 38 Gelligaer and Merthyr Common as shown on **Figure 5**. Therefore, the DNS application will be accompanied by an application for consent to deregister and offer exchange Common Land and consent to carry out restricted works on Common Land (pursuant to sections 16 and 38 of the Commons Act 2006).

The application for consent, including this DAS will be submitted alongside an Environmental Statement (ES) providing a detailed description of the environmental baseline and assessment of impacts upon it, committed mitigation and anticipated residual effects. The DAS should be read in conjunction with the other documentation accompanying the applications for consent, in particular:

- the ES (RSK 2023) of which Volume 2 is the written statement, and Volume 3 is the graphics referred to elsewhere in this document;
- the Planning Statement (DB Planning 2023); and
- the Statement on Agriculture and the interests of the commoners (Savills 2023).

1.2 Purpose of a Design and Access Statement

The purpose of a DAS is to explain:

- the design principles and concepts that have been applied to the development; and
- how issues relating to access to the development have been dealt with.

Technical Advice Note (TAN) 12 *Design* (2016) defines a DAS as a communication tool which outlines how the design of the proposal has been considered from the outset of the development process and how the objectives of good design have been used to inform this.

This DAS seeks to fulfil these requirements by exploring the principles and factors that have influenced the design of, and discussing the access arrangements for the Proposed Scheme.

1.3 Statutory Context to the DAS

Section 14 paragraph 2 of the Developments of National Significance (Procedure) (Wales) Order 2016 states a DAS must:

- (a) explain the design principles and concepts that have been applied to the development;
- (b) demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
- (c) explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
- (d) explain how any specific issues which might affect access to the development have been addressed.

1.4 Site Context

The proposed Pen March Wind Farm Site Boundary covers an area of approximately 459.9 hectares (Ha) and is roughly defined by the Bannau Brycheiniog National Park boundary to the north, Nant Tor-gwyn to the west, Nant Pitwellt to the east, and the Common Road to the south.

The Site comprises a broadly sloping area of purple moor grass dominated grassland, with small, scattered areas of dense scrub, exposed rock, dry heath and standing open water habitats. The Site rises from approximately 370 m above sea level at the southern extent of the area (adjacent to the A465 road) up to approximately 530 m in the north of the area. The wider landscape around the Site is typified by grazed moorland habitats, with frequent scattered areas of industrial and residential development to the south, south-east and south-west of the Site and the Bannau Brycheiniog National Park lying to the north.

The majority of the Site is registered as Common Land (see **Figure 5**) and makes up part of Common Land Unit 38 (Gelligaer and Merthyr Common), which also extends to the south of the A465 Heads of the Valleys Road.

The majority of the Site is located within both Caerphilly County Borough Council (CCBC) and Merthyr Tydfil County Borough Council (MTCBC).

1.5 Project Description

The Proposed Scheme would deliver renewable energy to the national energy grid and would contribute to meeting national climate change targets. As well as providing renewable energy the scheme would also provide opportunities for community investment and create further employment opportunities in the local area. The Proposed Scheme layout is shown in **Figure 3** of this document, with a full description of the components included in ES **Volume 2, Chapter 3: Proposed Scheme**.

2 PLANNING POLICY AND GUIDANCE

A separate planning statement has been prepared, which accompanies the application for consent for the Proposed Scheme. This section of the DAS identifies relevant national and local planning policy and guidance.

2.1 National Planning Policy and Guidance

The UK and Wales's current climate change ambitions are amongst the highest in Europe. The Environment (Wales) Act 2016 sets a target to reduce greenhouse gas emissions in Wales by 80% by 2050. Furthermore, the Welsh Government has declared a climate emergency and more recently in March 2021 the Senedd Cymru has approved a net zero target for 2050. Renewable energy is a key component to achieving greenhouse gas emission reduction. In 2017, the Welsh Government announced a target of meeting 70% of Wales's electricity consumption from renewable electricity sources by 2030 (Welsh Government, 2017).

Planning Policy Wales (PPW) (Welsh Government, 2021) details the land use planning policies of the Welsh Government, with the objective to ensure the delivery of sustainable development. PPW notes that energy demand is expected to grow due to the growing electrification of transport and heat, and that significant investment will be needed in energy generation, transmission, and distribution infrastructure. PPW identifies that low carbon electricity must become the main source of energy in Wales. Renewable and low carbon energy are seen as part of the overall commitment to tackle the climate emergency and increase energy security. PPW also recognises that wind energy forms a key part of meeting renewable energy production due to Wales's considerable wind resource. In relation to Design and Access Statements, PPW identifies that a DAS communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process (Section 3.17). A DAS should show how the design of the scheme has responded to the sustainable transport hierarchy (Section 4.1.18).

Future Wales: The National Plan 2040 (2021) provides a framework for planning change and development and has development plan status. Policy 9 identifies the importance of resilient ecological networks and green infrastructure. It states *"in all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment."* Policy 12 Regional Connectivity identifies the sustainable transport hierarchy for planning and its importance in design and access of planned developments. Policy 17 on renewable and low carbon energy and associated infrastructure and Policy 18 on renewable and low carbon energy developments of national significance, provide the strategic spatial and detailed criteria based policies for renewable and low carbon energy developments. Policy 17 identifies 10 'Pre Assessed Areas for Wind Energy'. There is a presumption in favour of large-scale wind energy development in these areas, subject to the criteria in Policy 18. The Proposed Scheme is not located within one of the Pre-Assessed Areas, but it is located approximately 5.5 km from Pre-

Assessed Area 10. Future Wales notes that “*Outside of these areas a positive policy framework still exists, subject to policy 18*”.

2.2 Local Planning Policy and Guidance

Future Wales makes it clear that applications for Developments of National Significance must be determined in accordance with Future Wales which now forms part of the Development Plan. Local Development Plans (LDPs) remain relevant and there are two LDPs which cover the Site. The relevant Development Plan documents are as follows:

- The Merthyr Tydfil Replacement Local Development Plan (2016 – 2031) adopted by the Council on 29 January 2020.
- The Caerphilly LDP which was adopted on 23 November 2010.

Of particular relevance to the design of the Proposed Scheme is that the northern boundary of the Site is contiguous with Bannau Brycheiniog National Park and within a Special Landscape Areas (SLA), SLA 23. Upper Rhymney Valley, and SLA 33. Nant Morlais and Cwm Taff Fechan (see Figure 5.5a Local Landscape Designations in Volume 4 of the accompanying ES).

The Merthyr Tydfil LDP Policy EcW8: Renewable Energy states that the Council will support the use of renewable energy as a tangible means of reducing local carbon footprint, where appropriate to do so, and that development proposals for renewable energy will be permitted where they do not have an unacceptable landscape and visual impact, including on the setting of the Bannau Brycheiniog National Park.

The Merthyr Tydfil LDP Policy EnW5: Landscape Protection states that, where SLAs exist, where development is acceptable, careful consideration is given to the design and scale of the development including siting, orientation, layout and landscaping and the special qualities and characteristics for which the SLAs have been designated are protected. The Caerphilly LDP Policy CW4: Natural Heritage Protection states that Development proposals that affect locally designated natural heritage features, will only be permitted Where they conserve and where appropriate enhance the distinctive or characteristic features of the SLA or Visually Important Local Landscape (VILL).

2.3 Other Guidance

2.3.1 Technical Advice Notes

A series of Technical Advice Notes (TANs) supplement PPW. Those of relevance to the DAS are:

- TAN 12: Design (2014); and
- TAN 18: Transport (2007)

2.3.2 Other documents

The Welsh Government (2016) Development Management Manual has also been consulted in the preparation of this DAS.

3 DESIGN STATEMENT

The following section provides a summary of the design evolution, the Applicant's approach to site selection and design, and the key decisions made prior to submission of the application. It summarises the key points made in **Volume 2, Chapter 2: Site Selection and Design Evolution** of the ES.

3.1 Site selection

The Applicant identifies potential sites for wind farm development in Wales through a constraints-based feasibility approach, with sites being evaluated against the following criteria:

- Future Wales: The National Plan 2040. Policy 17 - 'Pre-Assessed Areas for Wind Energy'. Policy 18 renewable and low carbon energy developments of national significance.
- National and international designations;
- Distance from dwellings;
- Exposed sites with good wind speed;
- Feasibility of grid connection;
- Access feasibility; and
- Compatibility with aviation interests.

An essential element of the search for potential sites is the identification of landowners interested in development.

The Proposed Scheme area was confirmed as a good site for development following feasibility work.

3.1.1 Alternative sites

The Applicant has a well-established process for selecting sites and identifying land for wind farm development. The overall approach to wind farm site selection is to identify areas of land where the siting of a wind farm would result in minimal environmental effects, be free from overriding technical constraints, and be economically viable. This initial site identification exercise involves:

- A review of current and emerging planning policy (at the National and Local level).
- Geographical Information System (GIS) constraints analysis, including analysis of wind speed data.
- A review of suitable site access points and related transportation issues

Further information on these specific elements is provided in Section 2.2 of the ES.

The proposed Site boundary has reduced as technical studies have progressed and has been reduced since the Scoping Direction was issued in July 2020. The western portion of the Site has been removed owing to a high risk shake hole zone. This was not considered suitable for development and has therefore been removed from the development boundary.

The Site for the Proposed Scheme demonstrated the necessary attributes for the construction and operation of a wind farm development without significant technical or environmental constraints.

3.2 Design Strategy

The wind farm design and layout were adapted and altered in response to environmental constraints and consultation feedback. The key constraints are shown on **Figures 2a, 2b and 2c**.

The location and sensitivity of all identified environmental receptors were mapped, and appropriate buffers around them were agreed between the technical specialists and project engineers. The main considerations with regard to the design were as follows:

- Peat deposits – avoiding wherever possible and minimising impacts to deeper peat (>0.4 m). Avoiding peat completely would make the site unviable.
- Proximity to residences – maintaining sufficient distance from nearby properties of at least 1 km.
- Views from receptors.
- Landscape considerations concerning the Bannau Brycheiniog National Park.
- Shake hole risk zones – avoiding high risk shake hole zones.
- Proximity to watercourses – maintaining 50 m setback from watercourses.
- Curlew territories – maintaining distance away from curlew nesting sites.
- Priority habitats – avoiding priority habitats identified on site.
- Proximity to gas pipelines – maintaining safe distances for operation and construction purposes, 1.5 times the hub height.
- Scheduled monument – maintaining sufficient distance from a historic asset proposed for scheduling.
- Turbine separation – maintaining sufficient separation between turbines.
- Over sail limits near site boundary.

3.3 Design Evolution

The Proposed Scheme went through a series of four principal design iterations, largely responding to on-going environmental and technical surveys, as well as feedback from statutory and non-statutory consultees.

- Significant changes to the design of the Proposed Scheme have related to:
- Changes to the wind turbine layout, including; reducing the number of turbines, altering the positioning of the wind turbines (and associated infrastructure including hardstandings and laydown areas), and consideration of the hub height and overall height to blade tip.
- Changes to the position of site access tracks.
- Changes to the location of the control building and electrical compound.

- Changes to the Site access entry point and route into Site.

The main considerations with regard to facilitating a detailed design assessment are presented in Table 2.1 of Volume 2 of the ES. The different iterations of the layout have been developed at different stages in the project design process (see **Figure 3**).

3.3.1 Layout A (2020)

Layout A comprised seven wind turbines up to 180 m tip height. Layout A was developed in advance of the request for an EIA Scoping Direction. Layout A was informed by initial technical and environmental constraints, including a desk-based feasibility study, and was developed prior to any detailed site-specific surveys being completed.

This early design included consideration of appropriate distances at least 800 m from residential receptors, as well as consideration of landscape and visual impacts owing to the northern boundary of the Site being contiguous with Bannau Brycheiniog National Park and within a Special Landscape Areas (SLA), SLA 23. Upper Rhymney Valley, and SLA 33 Nant Morlais and Cwm Taff Fechan.

3.3.2 Layout B (May 2020)

Layout B comprised seven wind turbines up to 180 m tip height. Layout B was presented as part of the request for an EIA Scoping Direction. Layout B was informed by early results of on-site surveys and technical specialist consultant inputs. In addition, the layout was informed by desk top surveys carried out across the Site to determine the likelihood of shake holes. A national grid high pressure pipeline was also identified, and avoided, following a detailed utilities search.

3.3.3 Layout C (December 2020)

Layout C comprised seven wind turbines up to 180 m tip height. Layout C was tested against additional environmental and technical survey work, and consultee comments received as part of the 2020 Scoping Direction. The following design consideration were captured as part of the design process:

- Stage 1 Peat Surveys and comprehensive mapping of hydrological receptors following a hydrological walkover survey.
- Identification of underground archaeological records identified through Historic Environment Records and engagement with the LPA Curator.
- Development of noise contours based on baseline noise monitoring.
- Identification of curlew breeding territories (on site and in close proximity to the Site).
- Avoidance of priority habitats following Phase 1 Surveys, peat surveys, and additional National Vegetation Classification (NVS) Surveys.
- Potential interference with Joint Radio Company (JRC) protected link identified through telecommunications consultation

3.3.4 Layout D (March 2021)

Layout D comprised six wind turbines up to 180 m tip height. The key design drivers for the development of Layout D included:

- Additional peat surveys to inform the over-arching infrastructure layout, in particular the location of site access tracks. While the focus was on locating the turbines, cognisance was given throughout to the other infrastructure to ensure that selected turbine locations were also able to be accessed by an access track and there was sufficient opportunity for associated hardstanding within the known constraints.
- Based on the candidate turbine at the time (Nordex N133), landscape and visual testing of rotor lengths, diameters and aviation lighting considerations. The rotor length of the N133 was tested against a shorter rotor diameter to compare the effects of both with regard to the effects from key views. While the tip height was explored at this stage of the design, especially with regard to aviation lighting (required above 150m) it was considered unviable to reduce tip heights below this level.
- Additional consideration of shake holes in close proximity to Turbine T6 through Geophysical Surveys.
- Two design options for Turbine T1 (1a and 1b) were developed to consider how the turbine may be approached given the proximity to watercourses, peat deposits, and tricky topography.

Alongside the turbine layout, two access routes (orange and blue) were investigated. The western (orange) option was discounted as a result of a high-pressure gas pipeline and overhead cables making the construction working area too constrained. In addition, deeper peat was identified along the Western (blue) option. While the selected option was not the preferred option from a visual perspective, the other constraints and inaccessibility of the other option meant the Blue option was preferred.

The location of the electrical compound was mostly driven by the location of the grid connection and to minimise the planned cabling to the Dowlais substation, proximity to the turbine array to reduce cabling as well as maintaining safe distance from any turbines for safety purposes.

3.3.5 Layout E (August 2021)

Layout E comprised six wind turbines up to 180 m tip height. The main design drivers for Layout E related to further advanced survey for peat and included detailed positioning of the wind turbines and associated infrastructure, including an allowance for micro-siting during construction.

Further telecommunication consultation with the JRC raised an objection in relation to a protected telemetry link (the location of which was confidential). However, suitable mitigation was agreed with the JRC and the proposed turbine layout remained unchanged. Please refer to **Volume 2 Chapter 12: Other EIA Topics** of the ES for further details.

3.3.6 Layout F (August 2022)

The layout of the Proposed Scheme was developed and optimised in order to provide a visually coherent and balanced layout design, avoiding known constraints where practicable.

3.3.7 Proposed Scheme

The infrastructure layout was amended to remove any access tracks and construction works from the Powys County Council administrative area. Refer to **Figure 3.1 (Volume 3)**.

As identified in **Chapter 3: Proposed Scheme**, the proposed turbine locations and ancillary infrastructure are subject to a maximum micro-siting tolerance of 50 m in any direction within a defined area. Hence any future detailed design work will be within the assessment parameters of the micro-siting allowance such that environmental effects are not likely to be any worse than the assessed design.

3.4 Green Infrastructure

As an integral part of the ES and applications for consent, an Outline Habitat Management Plan (OHMP) has been included (**Technical Appendix 7.6, Volume 4**), which proposes habitat restoration and management measures both within and outside of the Proposed Scheme. These measures, which would remain in place for the lifetime of the scheme, are designed to provide compensation for the loss of peat, the potential displacement of breeding waders (notably curlew *Numenius arquata*) and the loss of upland habitats located within the Pen March / Traed y Milwyr Llechrhyd and Merthyr Common North Sites of Importance for Nature Conservation (SINCs). The measures would also provide biodiversity enhancements, in accordance with planning policy requirements.

The OHMP is intended as a precursor to a more detailed Habitat Management Plan (HMP), which would be produced and agreed with the relevant Local Planning Authorities (Caerphilly County Borough Council (CCBC) and Merthyr Tydfil County Borough Council (MTCBC)) post consent, prior to the commencement of construction.

The features which form the subject of the OHMP have been determined through consideration of the relative importance of ecological features present at the Site, the extent to which they may be affected by the Proposed Scheme (as set out in the ES), and the feasibility of providing beneficial measures for them within the Site.

The original OHMP (consulted on in November 2022) included details of proposed restoration and management measures on-site (i.e., within the Proposed Scheme) only. These measures were intended to compensate for the loss of upland habitats located within the SINCs and provide some additional biodiversity enhancement and have been retained unchanged within this updated OHMP. At the time of writing the original OHMP, RWE was investigating providing additional compensation for the loss of peat and the potential displacement of breeding curlew, plus additional biodiversity enhancement, off-site. However, at that time off-site proposals had yet to be agreed and as such it was not possible to provide any details within the original OHMP.

The updated OHMP now includes outline details of proposed off-site measures, located on land owned by Dŵr Cymru Welsh Water (DCWW) adjacent to the Proposed Scheme Site boundary to the east, which have been discussed and agreed in principle with DCWW. Off-site measures are required because the potential to provide beneficial measures for peat and curlew within the Site itself is limited due to: a) most of the Site being actively grazed common land, making delivery of habitat enhancements challenging; and b) a relative lack of suitable areas for peatland restoration

No other important ecological features are likely to be significantly affected by the Proposed Scheme, subject to the implementation of “standard” good practice mitigation measures during the construction phase (see **Volume 2, Chapters 7 and 8** of the ES for further details). Other ecological features are therefore not priorities for management action in the OHMP.

4 ACCESS STATEMENT

The following section provides a summary of the existing context regarding access to the Site, how the Proposed Scheme will change access during construction and operation. It explains the approach taken to access, how policies relating to access in the applicable development plans (see Section 2 above) have been taken into account, and how any specific issues which might affect access to the Proposed Scheme have been addressed.

Further information is provided in the ES, in particular in **Volume 2, Chapter 3: Proposed Scheme** and **Chapter 10: Access, Traffic and Transport**.

4.1 Context and existing access

4.1.1 Vehicular access

The Common Road runs along the southern edge of the Site boundary from which access to the Site can be gained. Access to the Common Road (also known as Old Rhymney Road locally) can be via the A465 from the west or by the A4060 and A470 from the south.

4.1.2 Public Rights of Way / Public Access

The whole of the Site is registered as Common Land making up part of Common Land Unit 38 (Gelligaer and Merthyr Common), as shown in **Figure 5**. Under Section 193 of the Law of Property Act 1925, the public have rights to access the Common.

There are two Public Footpaths (RHYM/FP101/1 and RHYM/FP101/2) located within the Site boundary. One is located part way along the western boundary following the Site boundary before continuing further west. The second is located along southern half of the eastern boundary.

There is a Bridleway (RHYM/BR103/1) located adjacent to the southern edge of the Site boundary that is approximately 400 m in length and connects into the Common Road at its most northerly point.

Part of National Cycle Network route number (NCR) 46 follows a section of the Common Road, located along the southern edge of the Site Boundary. Along the Common Road an on-road section of the route is present, and this connects to a traffic-free route to the west providing a link to Pant.

There are a number of informal paths which run across the Site. The paths are largely grouped towards the north-east of the Site following Nant Pitwellt.

4.2 Applicable Development Plan policies

The development plan policies relating to access that are most relevant to the Proposed Scheme can be broadly divided as follows:

- policies encouraging active travel and the travel hierarchy, such as Section 4.1.18 of PPW, which states that a DAS should show how the design of the scheme has responded to the sustainable transport hierarchy;

- policies relating to consideration of transport and access in the design of developments. For example, the Caerphilly LPD Policy CW1 on Sustainable Transport, Accessibility and Social Inclusion indicates that developments likely to generate a significant number of trips will only be permitted if sustainable modes of transport (e.g., walking and cycling) are encouraged, and that environmental impacts have been considered in terms of freight trips; and
- policies discouraging loss of access to public rights of way and Common Land. For example, Section 6.3.18 of PPW states that access to Common Land should not be prevented or impeded unnecessarily to ensure its proper management.

Each of these elements and their relevance to the Proposed Scheme are considered under the following section.

4.3 The Proposed Scheme

This section provides a summary of the arrangements made for access to the Site during both the construction and operational phases.

4.3.1 Approach taken to access during construction

4.3.1 *Construction staff and activities*

During construction, access to the Proposed Scheme will be via a new access junction from the Common Road. The access junction would be designed to accommodate all predicted loads and traffic for all phases of the Proposed Scheme. The access to the turbine array is identified on **Figure 4** of this Design and Access Statement. An indicative junction layout is provided in Volume 4 of the ES.

There are no public transport links (bus stops or train stations) close to the Proposed Scheme's entrance. The nearest bus stop is at Pentwyn Farm (a 20-minute walk), and the nearest railway station is at Rhymney (a 40-minute walk) from the Proposed Scheme's entrance.

It would be feasible for construction staff to travel to the Site via National Cycle Network route number 46, which passes along the Common Road that forms the southern boundary of the Site. For the purposes of assessing traffic and transportation impacts in the ES, it has been assumed that construction staff would arrive in non-HGV vehicles, including a combination of minibuses and cars. The construction workforce on-site will depend on the activities being undertaken at the time.

Means of promoting active travel and non-car alternatives to commute to the Site for construction will be communicated to the construction workforce, and means of limiting the effects of construction traffic on the Local Road Network will be secured through a Construction Traffic Management Plan. See further information below.

Abnormal Indivisible Load Deliveries

Wind turbine parts are transported in separate components to the Site, then assembled on the Site. The nacelle, blades and tower sections are classified as

Abnormal Indivisible Loads (AILs) due to their weight, length, width and height when loaded. A single capacity erection crane will also be transported to and from the Site during the construction phase.

It is anticipated that abnormal load vehicles carrying turbine components will travel to the Site from the port of entry at Swansea. The route from the port to Site is likely to be via the A483, M4, A465 and finally the Common Road which runs along the southern boundary of the Site. This is shown in Figure 10.4 of Volume 4 of the ES.

Other Deliveries

Throughout the construction phase, general deliveries will be made to the Site by means of heavy goods vehicles (HGVs). These would include fuel, site office and staff welfare.

Material deliveries, such as plant, concrete, cables and aggregates, will be delivered to the Site during the construction phase in appropriate vehicles from available sources.

Construction traffic management

A Construction Traffic Management Plan (CTMP) will be prepared and agreed with Caerphilly County Borough Council and Merthyr Tydfil County Borough Council in advance of the construction phase.

The CTMP will demonstrate compliance with national and local policy guidance and will set out detailed descriptions of actions required by Contractors to meet during the construction process, following these objectives:

- Ensure that movements of people, plant and materials are achieved in a safe, efficient, timely and sustainable manner.
- Ensure that any impact to local communities and the local economy is reduced as far as reasonably practical.
- Ensure that construction traffic levels do not exceed an acceptable level during network peak periods.
- Reduce and control construction vehicle trips where practical.
- Ensure that strategies and mitigation measures are implemented and adhered to through continued monitoring, review, and improvement; and
- Limit the effects of construction traffic on the Local Road Network.

4.3.1 *Members of the public and graziers/commoners*

During construction, access to the Site to graziers/commoners and members of the public, for example for recreation or livestock management, will not be restricted, except in areas where access is not permitted in order to permit construction activities to be undertaken safely, in line with the Construction (Design and Management) (CDM) Regulations 2015, applicable health and safety law and construction good practice.

The electrical compound, control building, battery storage facilities and construction compounds will be fenced during the construction phase. Fencing across the

remainder of the site will be kept to a minimum during the construction phase and used for health and safety purposes, and security and animal welfare, as and when required.

4.3.2 Approach taken to access during operation

Upon completion of the construction phase, outside of the structures comprising the operational elements of the Proposed Scheme (turbines, electrical compound, control building, and battery storage compound), the Site will remain accessible to graziers/commoners and members of the public.

The electrical compound, control building, and battery storage compound as shown on **Figure 4**, will be permanently fenced with 2.43 m high palisade fencing.

Access by graziers/commoners and members of the public to the Common Land using the Proposed Scheme's network of access tracks to facilitate grazing and recreational use will be permitted.

4.3.3 Impact of the Proposed Scheme on access to Common Land

The Proposed Scheme will involve the deregistration of 34.72 ha of Common Land (known as Release Land) and the registration of 34.72 ha of Replacement Land

During the operational phase, the infrastructure will have an overall footprint of 3.54 ha on the Release Land. Access to the Common Land by graziers/commoners will be improved through the network of access tracks forming part of the Proposed Scheme.

5 CONCLUSION

This Design and Access Statement explores the principles and factors that influenced the design of the Proposed Scheme and associated infrastructure and discusses the access arrangements for the Proposed Scheme, as required by Section 14 paragraph 1 of the Developments of National Significance (Procedure) (Wales) Order 2016.

The design of the Proposed Scheme was an iterative process influenced by numerous factors including legislative requirements and development plan policies, alongside economic, technical and environmental aspects. Consultation of key consultees and the public was also undertaken to provide an opportunity for them to raise any issues or concerns that might influence the design of the development.

The Proposed Scheme design and layout has been informed by the environmental and technical information gathered over a 2-year design timeframe. The consideration of environmental aspects during design has enabled many potential environmental impacts to be mitigated through design. The anticipated residual effects are described in Volume 2 of the ES that accompanies this DAS.

Access to the Site during construction will be carefully managed using an Access Management Plan to ensure minimal disruption to members of the public and commoners/graziers using the Common Land, in which the Proposed Scheme is located. Impacts on road users and local communities in the vicinity of the Site will be managed during construction via a Construction Traffic Management Plan.

During the operational phase of the Proposed Scheme, access to the Site will be largely unimpeded apart from access to the land on which the electricity and battery storage facilities and the wind turbines themselves are situated. The Site will be more easily accessible for graziers/commoners using the wind farm access track network, and Replacement Land will replace the Release Land.

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7 FIGURES

Figure 1 Site Location and Boundary

Figure 2 Site Constraints

Figure 3 Design Evolution

Figure 4 The Proposed Scheme

Figure 5 Common Land