

APPENDIX A

COPY OF THE SCHEDULE 1 SITE NOTICE
REQUIRED IN ACCORDANCE WITH ARTICLE
8(1)(a)(i)

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

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLE 8 AND 9(2)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at **Pen March Wind Farm at Gelligaer and Merthyr Common**

I give notice that RWE Renewables UK Swindon Ltd is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is the **construction and operation of a wind farm, battery energy storage systems and associated infrastructure** and considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:

Consent under Section 16 of the Commons Act 2006 to deregister and exchange common land

Consent under Section 38 of the Commons Act 2006 to carry out restricted works on common land to lay, maintain, replace and remove an underground electricity cable

You may inspect copies of the proposed application; the plans; and other supporting documents online at <https://penmarch.co.uk/>.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at penmarch@rwe.com or **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** by 15th December 2022.

Signed:



Date: 3rd November 2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

HYSBYSIAD O DAN ERTHYGL 8 A 9(2)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi'r cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr ar Ddatblygiad o Arwyddocâd Cenedlaethol (DAC) arfaethedig cyn cyflwyno cais cynllunio i Weinidogion Cymru. Bydd ceisiadau cynllunio ar gyfer DAC yn cael eu cyhoeddi gan Weinidogion Cymru a'r awdurdod cynllunio lleol perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn rhagfarnu eich gallu i gyflwyno sylwadau i Weinidogion Cymru ar unrhyw gais cynllunio DAC cysylltiedig. Dylech nodi y gall unrhyw sylwadau a gyflwynir gael eu rhoi ar y ffeil gyhoeddus.

Datblygiad arfaethedig yn **Fferm Wynt Pen March** ar **Comin Gelligaer a Merthyr**

Rhoddaf hysbysiad fod RWE Renewables UK Swindon Ltd yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sef **adeiladu a gweithredu fferm wynt, systemau storio ynni batris a seilwaith cysylltiedig** ac yn ystyried bod y caniatâd eilaidd canlynol yn gysylltiedig â'r cais arfaethedig ac y bydd neu y dylai penderfyniad mewn perthynas â'r caniatâd hwnnw gael ei wneud gan Weinidogion Cymru:

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Gallwch archwilio copïau o'r cais arfaethedig; y cynlluniau; a dogfennau ategol eraill ar-lein yn <https://penmarch.co.uk/>.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn ysgrifennu at yr ymgeisydd/asiant yn penmarch@rwe.com neu **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** erbyn **15 Rhagfyr 2022**.

Arwyddwyd:



Dyddiad: 3 Tachwedd 2022

APPENDIX B

DECLARATION THAT THE SITE NOTICE WAS
DISPLAYED IN ACCORDANCE WITH ARTICLE
8(1)(a)(i)



Pen March Wind Farm
RWE Renewables UK Swindon Ltd
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

<https://penmarch.co.uk/>
penmarch@rwe.com
01685 701354

**The Developments of National Significance (Procedure) (Wales) Order 2016
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 8 AND 9(2)
Proposed development at Pen March Wind Farm (PEDW Ref No: DNS/3253147)**

Declaration

I declare that in accordance with the The Developments of National Significance (Procedure) (Wales) Order 2016 site notices were displayed at three locations at the main public access points to the site, in accordance with the statutory requirements, for a minimum of 42 days.

I also declare the proposed application documents were published on the website <https://penmarch.co.uk/>, including information required to be available under Article 8(b) of the Developments of National Significance (Procedure) (Wales) Order 2016, for 42 days.

Signed: _____

Printed: Jenny Cowley, Development Project Manager, RWE Renewables UK Limited

Date: 2nd May 2023

APPENDIX C

COPY OF THE NOTICE SERVED ON ANY OWNER
OR OCCUPIER OF ANY LAND ADJOINING THE SITE
IN ACCORDANCE WITH ARTICLE 8(1)(a)(ii)

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

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLE 8 AND 9(2)

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Proposed development at **Pen March Wind Farm at Gelligaer and Merthyr Common**

I give notice that RWE Renewables UK Swindon Ltd is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is the **construction and operation of a wind farm, battery energy storage systems and associated infrastructure** and considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:

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Anyone who wishes to make representations about this proposed development must write to the applicant/agent at penmarch@rwe.com or **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** by 15th December 2022.

Signed:



Date: 3rd November 2022

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016

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Datblygiad arfaethedig yn **Fferm Wynt Pen March** ar **Comin Gelligaer a Merthyr**

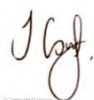
Rhoddaf hysbysiad fod RWE Renewables UK Swindon Ltd yn bwriadu gwneud cais i Weinidogion Cymru am ganiatâd cynllunio mewn perthynas â Datblygiad o Arwyddocâd Cenedlaethol sef **adeiladu a gweithredu fferm wynt, systemau storio ynni batris a seilwaith cysylltiedig** ac yn ystyried bod y caniatâd eilaidd canlynol yn gysylltiedig â'r cais arfaethedig ac y bydd neu y dylai penderfyniad mewn perthynas â'r caniatâd hwnnw gael ei wneud gan Weinidogion Cymru:

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Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn ysgrifennu at yr ymgeisydd/asiant yn penmarch@rwe.com neu **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** erbyn **15 Rhagfyr 2022**.

Arwyddwyd: 

Dyddiad: 3 Tachwedd 2022



0150300 Meters

N

Site Notice Locations

Site Boundary

JB	JC	21/07/2023	***
Drawn	Checked	Date	Approved

THE PERSON NAMED IN THE "APPROVED BY" BOX HOLDS RESPONSIBILITY FOR THE TECHNICAL CONTENT OF THIS DRAWING. NO MODIFICATIONS SHOULD BE CARRIED OUT WITHOUT THEIR CONSENT.

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RWE

RWE
Baylan Bay Innovation Centre
Central Avenue
Baylan Energy Park
Port Talbot
SA12 7AX

Size of original	Scale of original
A3	1:10,000
Site	PEN MARCH
Title	Site Notice Locations

Site Notice 1 (Photograph)



Site Notice 2 (Photograph)



Site Notice 3 (Photograph)



APPENDIX D

COPY OF THE NEWSPAPER PUBLICATION
REQUIRED IN ACCORDANCE WITH ARTICLE
8(1)(a)(iii)



Caerphilly Observer (03 November 2022)

Public Notices

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol
(Gweithdrefn) (Cymru) 2016

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD
CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGL 8 A 9(2)

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Gallwch archwilio copïau o'r cais arfaethedig; y cynlluniau; a dogfennau ategol eraill ar-lein yn <https://penmarch.co.uk/>. Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn ysgrifennu at yr ymgeisydd/asiant yn penmarch@rwe.com neu **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** erbyn 15 Rhagfyr 2022.

Signed: 

Date: 3rd November 2022

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

PUBLICITY AND CONSULTATION BEFORE APPLYING
FOR PLANNING PERMISSION
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Signed: 

Date: 3rd November 2022

To place your notice with **CaerphillyObserver** please call 029 2125 0855



Merthyr Express (03 November 2022)

Public Notices

Planning

Gorchymyn Datblygiadau o Arwyddocâd Cenedlaethol (Gweithdrefn) (Cymru) 2016
CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
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Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn ysgrifennu at yr ymgeisydd/asiant yn penmarch@rwe.com neu RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX erbyn 15 Rhagfyr 2022.

Arwyddwyd: Jenny Cowley

Dyddiad: 3 Tachwedd 2022

The Developments of National Significance (Procedure) (Wales) Order 2016
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 8 AND 9(2)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at Pen March Wind Farm at Gelligaer and Merthyr Common

I give notice that RWE Renewables UK Swindon Ltd is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is the construction and operation of a wind farm, battery energy storage systems and associated infrastructure and considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:

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Anyone who wishes to make representations about this proposed development must write to the applicant/agent at penmarch@rwe.com or RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX by 15th December 2022.

Signed: Jenny Cowley

Date: 3rd November 2022

APPENDIX E

DECLARATION THAT THE APPLICANT HAS
COMPLIED WITH THE PUBLICATION
REQUIREMENTS OF ARTICLE 8(1)(b)



Pen March Wind Farm
RWE Renewables UK Swindon Ltd
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

<https://penmarch.co.uk/>
penmarch@rwe.com
01685 701354

**The Developments of National Significance (Procedure) (Wales) Order 2016
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 8 AND 9(2)
Proposed development at Pen March Wind Farm (PEDW Ref No: DNS/3253147)**

Declaration

I declare that in accordance with the The Developments of National Significance (Procedure) (Wales) Order 2016 site notices were displayed at three locations at the main public access points to the site, in accordance with the statutory requirements, for a minimum of 42 days.

I also declare the proposed application documents were published on the website <https://penmarch.co.uk/>, including information required to be available under Article 8(b) of the Developments of National Significance (Procedure) (Wales) Order 2016, for 42 days.

Signed: 33 Developments of National Significance

Printed: Jenny Cowley, Development Project Manager, RWE Renewables UK Limited

Date: 2nd May 2023

APPENDIX F

FEEDBACK REPORT

Pen March Wind Farm Development of National Significance Feedback Report

PEDW Ref: DNS/3253147

FINAL

July 2023



Project ref:	DNS/3253147
Status	FINAL
Date	July 2023
Prepared by	Sarah Jones
Checked by	Angharad Davies
Authorised by	Angharad Davies

Cadno Communications Ltd
Studio 210
The Creative Quarter
Morgan Arcade
CF10 1AF

www.cadnocomms.co.uk

info@cadnocomms.co.uk



Contents

Executive Summary	5
Background	6
Requirements under the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)	6
Additional public consultation activities	7
Publication of Schedule 1 Notice in Newspaper	8
Community Consultees	9
Engagement with Community Consultees	11
Feedback from Community Consultees	12
Public Consultation	13
Publicity	13
Website and virtual exhibition	15
Email address and phone number	16
Local libraries	16
Public exhibitions	16
Engagement with young people	18
Engagement with the local business community	18
Engagement with the local third sector	19
Informal consultation February - March 2021	20
Feedback	21
Key themes raised by the general public and the Applicant's response	28
Young Persons' Feedback	36
Appendix A: Maps	39
Appendix B: Covering letter to Community Consultees	40
Appendix C: Consultation Zone	42
Appendix D: Information Booklet	43
Appendix E: Freepost Feedback Card	47
Appendix F: Press adverts	48
Appendix G: Postcard	50
Appendix H: Young Persons' Information Booklet	51
Appendix I: Young Persons' Feedback Card	55
Appendix J: Press release	56
Appendix K: Poster	59
Appendix L: Website and virtual exhibition	61
Appendix M: Information boards	63



Appendix N: Feedback form.....	65
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Tables

Table 1 : Community Consultees	10
Table 2 : Engagement with Community Consultees	11
Table 3 : Feedback from Community Consultees	12
Table 4 : Idris Davies School, 16 th November 2022.....	17
Table 5 : Ael y Bryn Sports & Community Centre, 23 rd November 2022	18
Table 6 : Sources of feedback	21



Executive Summary

1. This report has been prepared by Cadno Communications Ltd (Cadno) on behalf of RWE Renewables UK Swindon Ltd (hereafter, the 'Applicant').
2. 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.
3. The Proposed Scheme comprises the construction and operation of up to six wind turbines and associated infrastructure. The Proposed Scheme is classed as a Development of National Significance (DNS) as the combined installed capacity of the power generating elements will be greater than 10MW.
4. 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).
5. Prior to submitting a full DNS application, the Proposed Scheme must be publicised and consulted on for a period of at least 42 days from the date that relevant notices have been served. The Developments of National Significance (Procedure) (Wales) Order 2016 (hereafter, the 'DNSPWO') set out the requirement for publicising and consulting on any proposed application.
6. The Pre-Application Consultation (PAC) period for the Proposed Scheme ran from 3rd November until 15th December 2022.
7. Cadno was appointed to conduct certain statutory requirements of the PAC process, including:
 - Publication of the Schedule 1 Notice in a local newspaper (in accordance with Article 8(1)(a)(iii) of the DNSPWO);
 - Publishing information on a dedicated project website (in accordance with Article 8(1)(b)(i) to (viii) of the DNSPWO); and
 - Notifying Community Consultees of the Proposed Scheme and PAC process (in accordance with Article 9(2) of the DNSPWO).
8. Cadno was also appointed to conduct additional consultation activities with the general public. The public consultation ran from 3rd November until 15th December 2022. A range of activities were undertaken, including sending an information pack to the 4,914 households within a 3km radius of site. Three public consultation events were held during the consultation for residents to attend, find out more and provide feedback. The public exhibition was also taken into Idris Davies School in Caerphilly.
9. A total of 379 feedback forms were received.
10. In response to direct questions asked, 69% of respondents (257 individuals) stated they were supportive of the Proposed Scheme. 20% (77 individuals) stated they were not supportive, and 11% (40 individuals) stated they were unsure whether they support the proposal.
11. 84% of respondents (231 individuals) recognised there is a climate emergency.



Background

12. 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.
13. In Wales, all onshore wind energy generation projects above 10 MW are defined as Developments of National Significance (DNS). The Proposed Scheme comprises the construction and operation of up to six wind turbines and associated infrastructure. The Proposed Scheme is classed as a Development of National Significance (DNS) as the combined installed capacity of the power generating elements will be greater than 10MW.
14. Between 3rd November 2022 and 15th December 2022, the Applicant conducted PAC on the Proposed Scheme.

Requirements under the Developments of National Significance (Procedure) (Wales) Order 2016 (as amended)

15. Cadno was appointed by the Applicant to undertake the following requirements detailed in the Developments of National Significance (Procedure) (Wales) Order 2016 (hereafter, the 'DNSPWO').
16. Article 8(1)(a)(iii) of the DNSPWO:
 8. – (1) *The applicant must publicise the proposed application by—*
 - (iii) *by publication of the notice in a newspaper circulating in the locality in which the land to which the proposed application relates is situated;*
17. This activity is discussed and evidenced in the section [Publication of Schedule 1 Notice in Newspaper](#).
18. Article 8(1)(b)(i)-(viii) of the DNSPWO:
 8. – (1)(b) *publishing the following information on a website maintained by the applicant, for not less than 42 days beginning with each day on which each of the notices referred to in subparagraph (a) or article 9(2) are given—*
 - (i) *the draft application form published by the Welsh Ministers under article 12(1)(a) (or a form substantially to the like effect), including the particulars specified in or referred to in the form;*
 - (ii) *a plan which identifies the land to which the proposed application relates;*
 - (iii) *any other plans, drawings and information necessary to describe the development which is the subject of the proposed application;*
 - (iv) *a copy of the notice required by article 6 which has not lapsed under paragraph (3) of that article;*
 - (v) *the design and access statement required by article 14;*
 - (vi) *subject to article 12(3), the particulars or evidence required by the Welsh Ministers under section 62(3) of the 1990 Act (applications for planning permission);*
 - (vii) *where applicable, a statement referred to as the environmental statement for the proposed development; and*



(viii) a written statement about any secondary consent connected with the proposed application in respect of which the applicant considers a decision on that consent is to be made or should be made by the Welsh Ministers, together with the draft application form and documents associated with such consents.

19. This activity is discussed and evidenced in the section [Website and virtual exhibition](#).

20. Article 9(2) of the DNSPWO:

9. - (2) Where an applicant is required to consult a community consultee or a relevant person, the applicant must give the community consultee or the relevant person requisite notice in writing of the proposed application.

21. This activity is discussed and evidenced in the section [Community Consultees](#).

22. The other requirements of the DNSPWO were undertaken by RWE or other agents of RWE.

23. The Schedule 1 Notice referred to throughout is provided in **Appendix A of the PAC Report**.

Additional public consultation activities

24. As a responsible developer, the Applicant is committed to engaging with members of the public, over and above the statutory consultees laid out in the DNSPWO.

25. Cadno was appointed by the Applicant to undertake additional, non-statutory, public consultation activities on its plans for the Proposed Scheme from 3rd November 2022 to 15th December 2022.

26. This report sets out how the applicant consulted with the public in the section [Public Consultation](#).



Publication of Schedule 1 Notice in Newspaper

27. Article 8(1)(a)(iii) of the DNSPWO states that:

8. – (1) The applicant must publicise the proposed application by—

(iii) by publication of the notice in a newspaper circulating in the locality in which the land to which the proposed application relates is situated;

28. In accordance with Article 8(1)(a)(iii) the Schedule 1 Notice was published in two publications:

- Merthyr Express, 3rd November 2022
- Caerphilly Observer, 3rd November 2022

29. Copies of both notices as published are provided in **Appendix D of the PAC Report**.



Community Consultees

30. Article 9(2) of the DNSPWO states that:

9. - (2) Where an applicant is required to consult a community consultee or a relevant person, the applicant must give the community consultee or the relevant person requisite notice in writing of the proposed application.

31. The Proposed Scheme is located within the administrative boundary of two local authorities: Caerphilly County Borough Council to the east and Merthyr Tydfil County Borough Council to the west. At the time of the PAC, a very small part of the access track to turbine one was located between Merthyr Tydfil County Borough Council and Bannau Brycheiniog National Park in an area of Powys County Council, which has since been removed from the Proposed Scheme. Maps demonstrating the boundaries are provided in [Appendix A](#).
32. The Proposed Scheme lies within the ward of Twyn Carno in Caerphilly County Borough Council. Twyn Carno is a single member ward, represented Labour's Councillor Carl Cuss. Cllr Cuss retained the seat in the 2022 local government elections. RWE has maintained close contact with Councillor Cuss throughout the development period.
33. Within Caerphilly County Borough the relevant community council is Rhymney Community Council. Similarly, the Applicant has maintained close contact with Rhymney Community Council throughout the development of the Proposed Scheme.
34. The Proposed Scheme lies within the ward of Dowlais and Pant in Merthyr Tydfil County Borough. The ward was served by four councillors until May 2022 when electoral boundary changes reduced the number of seats to three. At the time of the PAC, the three Independent councillors were Councillor David Hughes, Councillor Paula Layton, and Councillor Declan Sammon. The Applicant has maintained close contact with the councillors for Dowlais and Pant and their predecessors throughout the development of the Proposed Scheme.
35. Within Merthyr Tydfil County Borough, the Proposed Scheme is within Pant Community, which does not have an active community council.
36. At the time of the PAC, the access track to the northernmost turbine was due to cross the local authority boundary into Powys. This area of 0.04 of a hectare lies in the Llangynidr and Llangattock ward in Powys County Council. The ward is served by one councillor. At the time of the PAC, the councillor is Liberal Democrat Councillor Jackie Charlton.
37. Within Powys, the relevant community council is Llangynidr Community Council.
38. The track design changed slightly after PAC and is now wholly contained in Merthyr Tydfil, with no part of the proposed access track crossing into Powys.
39. The Community Consultees are listed below:

Community Consultee	Rationale
Councillor Carl Cuss	Caerphilly County Borough Councillor, Twyn Carno Ward
Councillor Jackie Charlton	Powys County Councillor, Llangattock and Llangynidr Ward
Councillor David Hughes	Merthyr Tydfil County Borough Councillor, Dowlais and Pant Ward



Community Consultee	Rationale
Councillor Paula Layton	Merthyr Tydfil County Borough Councillor, Dowlais and Pant Ward
Councillor Declan Sammon	Merthyr Tydfil County Borough Councillor, Dowlais and Pant Ward
Llangynidr Community Council	Local community council
Rhymney Community Council	Local community council

Table 1 : Community Consultees

40. The Schedule 1 Notice and covering letter ([Appendix B](#)) were sent to Community Consultees by first class post on Monday 31st October 2022.
41. Strike action by the Communication Workers Union affecting Royal Mail postal services was planned for 2nd, 3rd and 4th November 2022 so the notice was sent by post a few days earlier than would have been usual to avoid delays caused by the strike action. In the event, the strike action was cancelled on 30th October 2022.
42. The Schedule 1 Notice and covering letter were also sent to Community Consultees by email on Thursday 3rd November 2022.
43. On 7th December 2022 an email was sent to Community Consultees reminding them of the deadline for responses.

Members of the Senedd, Member of Parliament and Regional Members of the Senedd

44. Although they are not defined as statutory consultees, the Applicant wished to inform the local Members of the Senedd and Member of Parliament of the PAC.
45. On 28th October 2022 Dawn Bowden MS, Member of the Senedd for Merthyr Tydfil and Rhymney, and Gerald Jones MP, the Member of Parliament for Merthyr Tydfil and Rhymney were sent an email informing that that the PAC would be starting on 3rd November 2022. They were provided with an electronic copy of the poster ([Appendix K](#)) and invited to share it on social media.
46. The Schedule 1 Notice was sent to Dawn Bowden MS, Member of the Senedd for Merthyr Tydfil and Rhymney, and Gerald Jones MP, the Member of Parliament for Merthyr Tydfil and Rhymney by email on 3rd November 2022.
47. The Applicant has engaged regularly with Dawn Bowden MS, meeting her twice: on 19th November 2021 and 25th November 2022. The Applicant also met with Dawn Bowden MS's Head of Office twice, on 1st October 2019 and 29th October 2020.
48. The Applicant has met with Gerald Jones MP twice, on 6th September 2019 and 20th January 2022.
49. The four Regional MSs for South Wales East (Natasha Asghar MS, Delyth Jewell MS, Laura Anne Jones MS and Peredur Owen Griffiths MS) were informed of the PAC by email on 28th October 2022.
50. Peredur Owen Griffiths MS and Natasha Asghar MS each responded to request a briefing meeting. The Applicant briefed them separately via Microsoft Teams on 7th December and 14th December 2022 respectively.



Engagement with Community Consultees

51. During the development of the planning application for the Proposed Scheme, RWE met with the ward councillors and community council on the following dates to brief them on plans for the Proposed Scheme:

Meeting date	Community Consultee	Summary of activity
23 Oct 2019	Councillor Carl Cuss	Councillor Carl Cuss was provided with an introduction to the Proposed Scheme.
12 Nov 2020	Councillor Carl Cuss	The Applicant provided an update to Councillor Carl Cuss and shared an indicative plan of the Proposed Scheme.
11 March 2021	Rhymney Community Council	Members of the Council raised questions about visual impact, shadow flicker, cumulative impact, the national park, proposed Community Benefit Fund, and noise.
9 April 2021	Dowlais Ward Councillors: Cllr Tony Rogers, Cllr Julian Amos, Cllr David Hughes, Cllr Declan Sammon (all Dowlais). Cllr Howard Barrett (Vaynor).	Attendees discussed the history of the Site (previous Bheara scheme), potential for jobs, access, and visual impact.
24 Nov 2021	Dowlais Ward Councillors: Cllr Tony Rogers, Cllr David Hughes, Cllr Declan Sammon.	The Applicant provided an update on the turbine layout, common land applications, expected statutory consultation dates, consultation zone, proposed Community Benefit Fund, and bat surveys.
6 Dec 2021	Councillor Carl Cuss	The Applicant provided an update on the Proposed Scheme.
13 Jan 2022	Rhymney Community Council	The Applicant provided an update that the number of turbines had reduced from seven to six. Attendees discussed transport and access to site, and land ownership.
Feb 2022	All Community Consultees	Newsletter update sent.
14 March 2022	Councillor Rosemarie Harris	Attendees discussed visual impact, community benefits, common land, and shared ownership.
13 Oct 2022	Councillor Jackie Charlton	The Applicant provided a project overview.
10 Nov 2022	Rhymney Community Council	The Applicant provided an update on the Proposed Scheme and information about the statutory consultation period.
29 Nov 2022	Llangynidr Community Council	The Applicant provided a project overview.

Table 2 : Engagement with Community Consultees



Feedback from Community Consultees

52. The following responses were received from the Community Consultees. Copies of responses are provided in **Appendix H of the PAC Report**.

Community Consultee	Opinion	Main issue
Councillor Carl Cuss	No response received	None
Councillor Jackie Charlton	Neutral	Land management, community gain, adherence to environmental policies, protection of peat.
Councillor David Hughes	Neutral	Tourism, site is not a pre-assessed area for wind, energy costs of local residents, environmental impact of turbine blades, loss of habitat, flicker. (Joint response on behalf of the three councillors for Dowlais and Pant.
Councillor Paula Layton	Neutral	Tourism, site is not a pre-assessed area for wind, energy costs of local residents, environmental impact of turbine blades, loss of habitat, flicker. (Joint response on behalf of the three councillors for Dowlais and Pant.
Councillor Declan Sammon	Neutral	Tourism, site is not a pre-assessed area for wind, energy costs of local residents, environmental impact of turbine blades, loss of habitat, flicker. (Joint response on behalf of the three councillors for Dowlais and Pant.
Llangynidr Community Council	Supportive	Community benefits.
Rhymney Community Council	Supportive	Visual impact, shadow flicker, historical impact, ecological impact.

Table 3 : Feedback from Community Consultees



Public Consultation

53. In addition to the statutory consultation, the Applicant wanted to maintain the high standards of community and stakeholder engagement that it adopts across its development portfolio. RWE adopted a comprehensive and broad approach to consultation, providing as many avenues as possible for members of the public to engage, in an accessible way.

Publicity

54. A number of activities were conducted to publicise the public consultation. These are detailed below.

55. A consultation zone of 3km of the Proposed Scheme was identified. A map of the consultation zone is at [Appendix C](#). This zone consisted of 4,914 households.

Information booklet and feedback form

56. A 32 page, A5, bilingual information booklet ([Appendix D](#)) and a Freepost feedback card ([Appendix E](#)) was sent by Royal Mail to the 4,914 households within 3km of the Proposed Scheme.

57. The booklet and feedback card were packaged in a paper wrapper printed with the property address.

58. The booklet was designed by Daydream Designs Creative Agency Ltd (Daydream Designs) based in Flintshire.

59. The booklet and feedback card were printed, packaged and mailed by Stephens & George Print Group Ltd (Stephens & George), based in Merthyr Tydfil.

60. The booklet was posted by second class mail on Friday 28th October to arrive with households from Monday 31st October 2022.

61. As a follow up to the 32-page information booklet, and to remind residents about the consultation, press adverts ([Appendix F](#)) were taken out in the Merthyr Express and Caerphilly Observer, and a postcard ([Appendix G](#)) was issued to households in the consultation zone. These activities are detailed below.

Strike action by the Communication Workers Union

62. Strike action by the Communication Workers Union affecting Royal Mail staff was planned for 2nd, 3rd and 4th November 2022. To avoid delays, the information booklet was sent a few days earlier than it would have otherwise been sent to ensure it reached households. The strike action was cancelled on 30th October 2022.

Young persons' information booklet and feedback form

63. During RWE's discussions with Caerphilly County Borough Council regarding shared ownership, it was identified that there were opportunities to engage with local schools. As a result, it was planned to work with Idris Davies School in Rhymney. Further detail on this is provided in [Public exhibitions](#).

64. A young person's information booklet ([Appendix H](#)) was produced which provided a simplified version of the material in the main information booklet, aimed at secondary age pupils.

65. The booklet was produced in A4 format, 32 pages, turned English and Welsh, on recycled paper stock.



66. A feedback card aimed at young people was produced in A5, with the questions in English on one side and Welsh on the other, on recycled paper stock ([Appendix I](#)).
67. These materials were taken to Idris Davies School on Wednesday 16th November 2022, and were emailed to stakeholders who were invited to share them widely.

Press release

68. A press release ([Appendix J](#)) was issued on 2nd November 2022 to local and trade press, embargoed until 3rd November 2022, as follows:
- 'Public consultation launched for 30MW south Wales windfarm', 3rd November 2022, Nation Cymru¹
 - 'Six wind turbines could be built if plans are given go-ahead', 16th November 2022, Caerphilly Observer²
69. A journalist from the Caerphilly Observer attended the public consultation event at Ael y Bryn Sports and Community Centre on 23rd November 2022 and interviewed the Pen March Project Manager Jenny Cowley and attendees. An article titled "It is making people think": general acceptance of Rhymney wind farm as energy prices surge³ was published on 1st December 2022 in the Caerphilly Observer.

Press adverts

70. In order to raise further awareness of the consultation amongst local residents, adverts were taken out in the Merthyr Express, published on 10th November 2022, and Caerphilly Observer, published on 17th November 2022. Copies of both adverts as they were published are provided at [Appendix J](#).

Postcard

71. In order to ensure residents in the consultation zone were aware of the consultation, a postcard was sent to the consultation zone ([Appendix C](#)). These were put into the postal system on 9th November and sent second class.

Poster

72. A bilingual, A4 poster ([Appendix K](#)) advertising the consultation and exhibitions was distributed to key stakeholders and venues in both printed copies and electronic copies. The poster was shared on social media as follows:
- Merthyr Tydfil County Borough Council's Facebook page⁴, 4th November 2022
 - Dawn Bowden MS's Facebook page⁵, 8th November 2022
 - Caerphilly County Borough Council's Facebook page⁶, 13 November 2022

¹ <https://nation.cymru/news/public-consultation-launched-for-30mw-south-wales-windfarm/>

² <https://caerphilly.observer/news/1013319/six-wind-turbines-could-be-built-near-rhymney-by-rwe/>

³ <https://caerphilly.observer/news/1013822/locals-accept-march-wind-farm-rhymney/>

⁴ <https://www.facebook.com/merthyrtydfilcbc>

⁵ <https://www.facebook.com/DawnBowden4MTR>

⁶ <https://www.facebook.com/CaerphillyCBC>



Website and virtual exhibition

73. The project website <https://penmarch.co.uk/> went live on 3rd November 2022. The website was developed by Daydream Designs and was in English and Welsh.
74. Following the close of PAC, the online feedback form was disabled on 19th December 2022. The consultation documents were on the website for longer than the statutory 42 days (in accordance with Article 8(1)(b) of the DNSPWO).
75. The website hosted:
- Information about the public exhibitions
 - Planning documents:
 - Draft application form (in accordance with Article 8(1)(b)(i) of the DNSPWO)
 - Site plan (in accordance with Article 8(1)(b)(ii) of the DNSPWO)
 - Other drawings and information (in accordance with Article 8(1)(b)(iii) of the DNSPWO)
 - Statutory Notice (in accordance with Article 8(1)(b)(iv) of the DNSPWO)
 - Design and Access Statement (in accordance with Article 8(1)(b)(v) of the DNSPWO)
 - Draft Environmental Statement (in accordance with Article 8(1)(b)(vii) of the DNSPWO)
 - Secondary consent (in accordance with Article 8(1)(b)(viii) of the DNSPWO)
 - Draft Non-technical Summary
 - Photomontages
 - Maps detailing the site boundary, access and Public Rights of Way (PRoW)
 - Downloadable versions of the main information booklet sent to households, and the Young Persons' information booklet
 - Information about RWE UK, RWE in Wales and careers with RWE
 - Link to register as a supplier
 - Link to virtual exhibition
 - Online feedback form
 - Contact details
76. The website received 694 visits from unique users with a total of 1,058 views between 3rd November and 15th December 2022.
77. The virtual exhibition was designed to provide high level information from the draft Environmental Statement in an accessible way for the general public. The virtual exhibition was provided in English and Welsh and hosted:
- Four-minute project overview video from Project Manager Jenny Cowley
 - Fifteen information panels covering the background to the project, site map, timeline, ecology and ornithology, hydrology and peat, archaeology and cultural heritage, landscape and visual impact, noise, transport and access, grid connection, common land, community benefits, climate change and policy.



- Interactive photomontages with six viewpoints around the Dowlais and Rhymney areas.
- Three links to the online feedback form
- Link to sign up to receive the Pen March Wind Farm newsletter
- Project contact details

78. The virtual exhibition received a total of 208 unique users and 402 views between 3rd November and 15th December 2022.

79. Screenshots of the website and virtual exhibition are provided at [Appendix L](#).

Email address and phone number

80. The project email account penmarch@rwe.com was advertised on the Schedule 1 Notice, newspaper notices, covering letter sent to Community Consultees, information booklet, press advert, postcard, poster, website, information boards, feedback form and young persons' information booklet and feedback form. Three members of the public contacted the project using the email address.

81. The project phone number 01685 701354 was advertised on the covering letter sent to Community Consultees, information booklet, press advert, postcard, poster, website, information boards, feedback form and young persons' information booklet and feedback form. Six people contacted the project using the phone line.

Local libraries

82. A copy of the draft bilingual Non-Technical Summary was placed at Dowlais Library in Merthyr Tydfil County Borough and Rhymney Library in Caerphilly County Borough. Cadno sought advice from both local authorities on the best libraries in which to place the information.

Public exhibitions

83. Three public exhibitions were held during the consultation period. Two events were held in each of Caerphilly County Borough and Merthyr Tydfil County Borough.

84. The events were attended by staff from RWE, Cadno and RSK Group (lead EIA consultant). The following collateral were available:

- Ten bilingual information boards (Appendix M)
- Feedback form ([Appendix N](#)), pens, clipboards and boxes to place completed forms
- Copies of the information booklet sent to households
- Information on RWE in Wales
- Local staff case studies

Date	Venue	Attendance
16 th November 2022	Idris Davies School	100 Year 7 students Approx. 100 students over lunch 9 members of School Council 7 members from the project team, of which 5 were RWE staff 10 members of the public



Date	Venue	Attendance
23rd November 2022	Ael y Bryn Sports & Community Centre	16 members of the public
26th November 2022	Dowlais Community Centre	21 members of the public

Wednesday 16th November 2022, Idris Davies School

85. The information boards were displayed in the upper school hall (also the canteen) of Idris Davies School in Caerphilly throughout the day from approximately 12pm.
86. The Applicant provided a presentation to approximately one hundred Year 7 students.
87. During lunchtime, students visited the exhibition, viewed the information boards and spoke to members of the team about Pen March. After lunch, the Applicant met the School Council.
88. From 3pm until 6pm the exhibition was open the members of the public. Ten members of the public attended.



Table 4 : Idris Davies School, 16th November 2022

Wednesday 23rd November 2022, Ael y Bryn Sports & Community Centre

89. From 3pm until 7pm on Wednesday 23rd November the exhibition was held in the main hall at Ael y Bryn Sports and Community Centre in Caerphilly. This venue had been recommended as a suitable venue by several local stakeholders.
90. Sixteen members of the public attended.





Table 5 : Ael y Bryn Sports & Community Centre, 23rd November 2022

Saturday 26th November 2022, Dowlais Community Centre

91. From 10am until 2pm on Saturday 26th November 2022 the exhibition was held in the main hall at Dowlais Community Centre in Merthyr Tydfil. This venue had been recommended as a suitable venue by several local stakeholders.

92. Twenty-one members of the public attended.

Engagement with young people

93. The Applicant is delighted to have had the opportunity to take the exhibition into Idris Davies School, to present to Year 7 and to meet with the school council.

94. The students were studying wind energy at the time, and the Applicant's input fitted well within the curriculum with regard to climate change and environment, as well as responsible global citizenship.

95. Each of the students were provided with a copy of the Young Persons' information booklet ([Appendix H](#)) and a Young Persons' feedback card ([Appendix I](#)). Additional booklets and feedback cards were provided to the school to be distributed to other students.

96. The Applicant is delighted to have received 98 completed forms from young people, which were completed by students on the day, and over subsequent days during lesson time. The feedback provided is thoughtful and insightful.

97. As a result of the experience, the Applicant has decided to liaise with local secondary schools for future projects, and prepare specific project collateral aimed at children and young people.

Engagement with the local business community

98. The Applicant held a Business Breakfast in partnership with Caerphilly and Merthyr Tydfil County Borough Councils on 9th February 2022.

99. The business breakfast was attended by 18 people, 12 subsequently registered their interest as a potential supplier to the Applicant.

100. Business representatives attending the Business Breakfast were also sent information about the PAC and invited to participate.



Engagement with the local third sector

101. During PAC, the Applicant's Community Investment Manager, Kathryn Harries, attended the public events, conducted her own consultation, had a questionnaire and had an information board dedicated to community benefits.
102. Initial meetings took place between the Applicant's Community Investment Manager and representatives of Gwent Association of Voluntary Organisation (GAVO) and Voluntary Action Merthyr Tydfil (VAMT) in March 2021.
103. More detailed conversations took place in the first proper phase of consultation on the community fund in 2022 where a set of questions were put to each of the following:

Date	Stakeholder
July 2022	GAVO (Alison Palmer, Deputy Chief Executive Officer and Gina Jones, Regional Strategic Lead).
July 2022	VAMT (Karen Vowles, Community Development Lead).
Nov 2022	Merthyr County Borough Council (Adam Richards, Commercial Manager and Chris Long, Head of Housing and Regeneration).
Oct 2022	Caerphilly County Council (Sean Rees, Community Development Manager and Paul Cooke, Team Leader Sustainable Development & Living Environment).
16 & 23 Nov 2022	The Community Investment Manager attended public exhibitions on 16 th and 23 rd November 2022 and held a consultation session with pupils from Idris Davies School on 16 th November 2022. A more detailed consultation questionnaire aimed at members of the public was also made available at the public exhibitions and online.
23 Nov 2022	Caerphilly County Councillor Carl Cuss was offered a one to one meeting. An informal conversation with the Applicant's Community Investment Manager took place at a public exhibition during PAC.
Date TBC	Local Merthyr Tydfil County Borough Councillors, Declan Sammon, Paula Layton and David Hughes have been offered a joint meeting which they have accepted.
Date TBC	Rhymney Community Council were invited to take part in the Applicant's initial consultation in October 2022 but decided to engage at a later date, post planning consent.

104. It should be noted that at this stage RWE has not finalised the details of any community investment package associated with the Proposed Scheme but has committed to work with neighbouring communities to develop the approach to supporting the local area.
105. Future potential consultation plans include wider promotion of the online questionnaire to encourage greater participation and holding focus groups (hosted by an independent third party) to encourage voluntary sector representatives to give their views.



Informal consultation February - March 2021

106. In February and March 2021 the Applicant conducted an informal public consultation on the Proposed Scheme.
107. At the time Covid-19 social distancing rules were in place in Wales and no public events were able to take place.
108. The Applicant informed residents of the informal consultation via a newspaper advert, through informing local key stakeholders and by sending a postcard containing information about the consultation to households within a 2.5km radius of the Proposed Scheme.
109. Information about the project and a feedback form were available on a website and virtual exhibition. Visitors could speak to the project team using a live web chat and could email the project team using a dedicated email address.
110. Twenty-five people completed an online feedback form. Fourteen people stated they opposed the plans. Seven people stated they supported the plans.
111. Opposition was due to concerns about potential visual impact, proximity to property, other turbines in the area already, stated residents suffer flicker and noise from existing turbines in Rhymney and Princetown. Concerns were also raised about the Bannau Brycheiniog National Park and potential negative impact on birds, bats and other wildlife.
112. Supportive comments recognised the need for green energy to help climate change.



Feedback

Methodology

113. Feedback was received from six sources:

Feedback source	Number of responses
Freepost feedback card sent to residents	232
Young persons' feedback card	98
Online feedback form	28
Feedback form provided at events	21
Email	3
Phone	6

Table 6 : Sources of feedback

114. The Applicant is pleased with the level of response. In particular the Freepost feedback card sent to residents was a convenient method for people to provide feedback.

115. Two residents who contacted the team by telephone had a number of queries and were sent additional information, including the Non-technical Summary and relevant chapters of the Environmental Statement. They were given time to read and consider the information and were given extra time - until 18th January 2023 - to respond.

116. The Freepost feedback card sent to residents ([Appendix E](#)) was designed to obtain feedback on the following areas:

- The project
- Climate change
- Age of the respondent
- Any other comments or feedback

117. Ten Freepost feedback cards were received several weeks after the deadline for responses had passed. One of the ten cards was significantly damaged and illegible. The other nine cards were logged are included in the feedback.

118. The feedback form provided at events and the online feedback form were identical ([Appendix N](#)). This was a longer form than the feedback card, allowing more space for the respondent to write, and designed to obtain views under five main areas:

- The project
- Climate change
- Shared ownership
- About the consultation
- About the respondent

119. The IP addresses of the forms submitted online were checked to monitor for multiple responses from the same individual which could skew results. No issues of this nature were found.



120. The young persons' feedback card ([Appendix I](#)) had six questions designed to obtain young people's views about

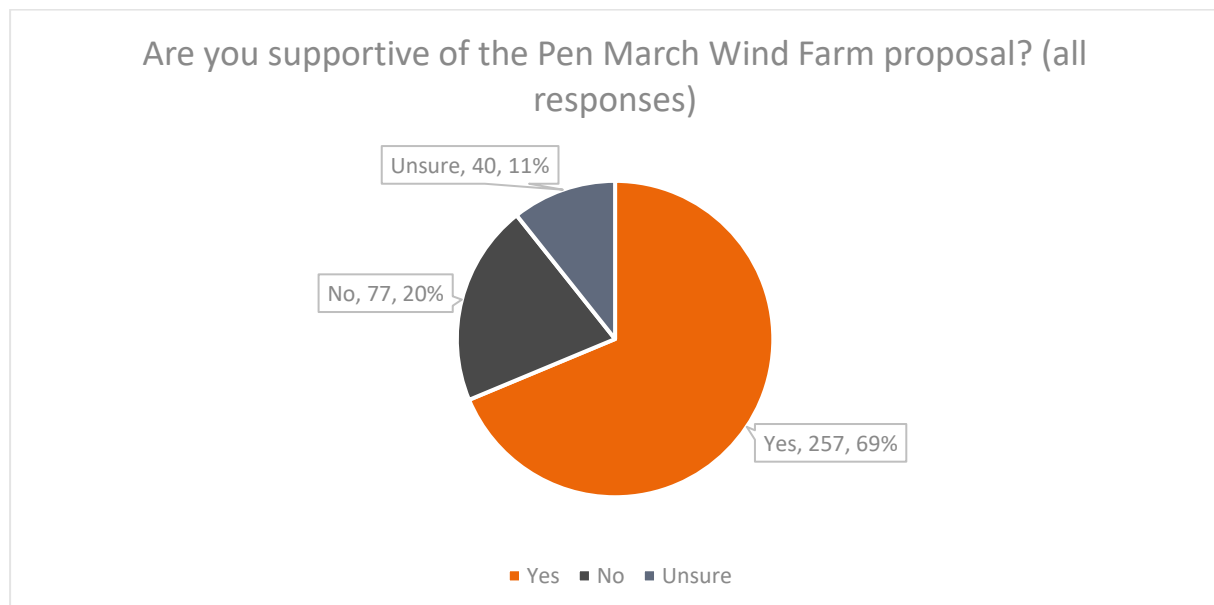
- Climate change
- Wind farms
- Support for the Proposed Scheme
- Community benefits

121. The findings from the feedback are presented below. The main themes from the Freepost feedback card, feedback form provided at the consultation events, the online feedback form, email and phone ('feedback from the general public') are discussed in detail in the section [Key themes raised by the general public](#). The key themes from the young persons' feedback have been analysed separately and are provided in the section [Young Persons' feedback](#). This has been done for clarity due to the questions being different. The exceptions to this are [Support for Pen March Wind Farm](#), and [Support for onshore wind generation](#) as all feedback forms asked about these. For these two question the total overall feedback is presented, as well as the feedback from the general population and young people being compared and contrasted.

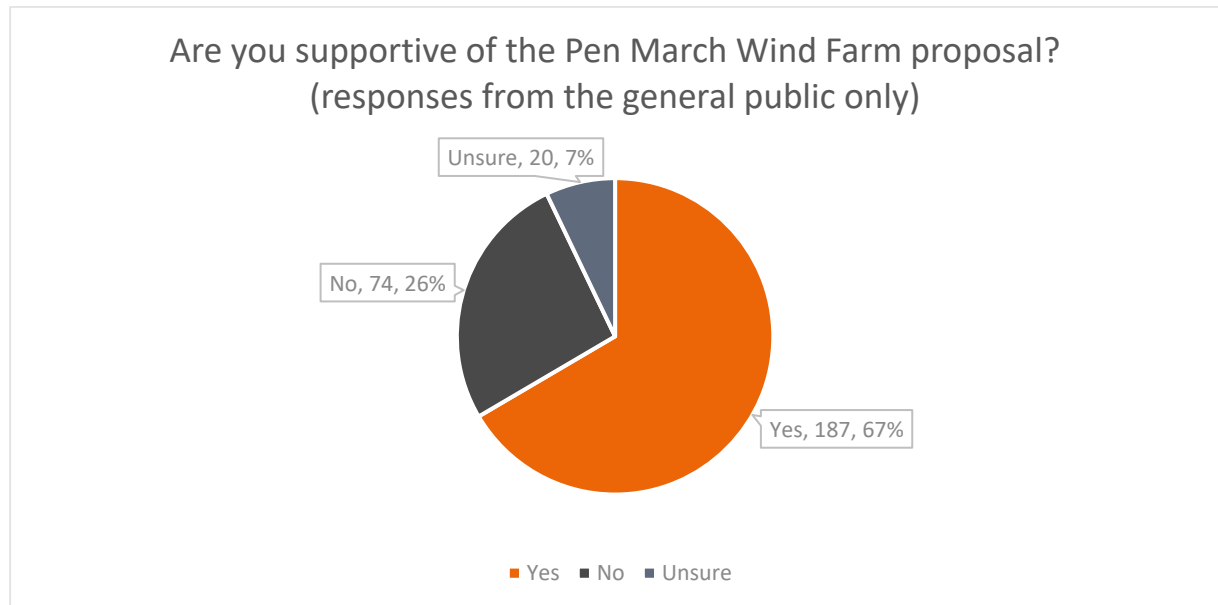
Support for the Proposed Scheme

122. All feedback forms asked whether the respondent was supportive of the Proposed Scheme. The feedback card, online feedback form and feedback form provided at events asked, '[Are you supportive of the Pen March Wind Farm Proposal?](#)' The young persons' feedback form was worded slightly differently as, '[In terms of the Pen March Wind Farm, please tick one of the following boxes: \(a\) I think it should be built, \(b\) I don't think it should be built, \(c\) I'm not sure what I think about it](#)'.

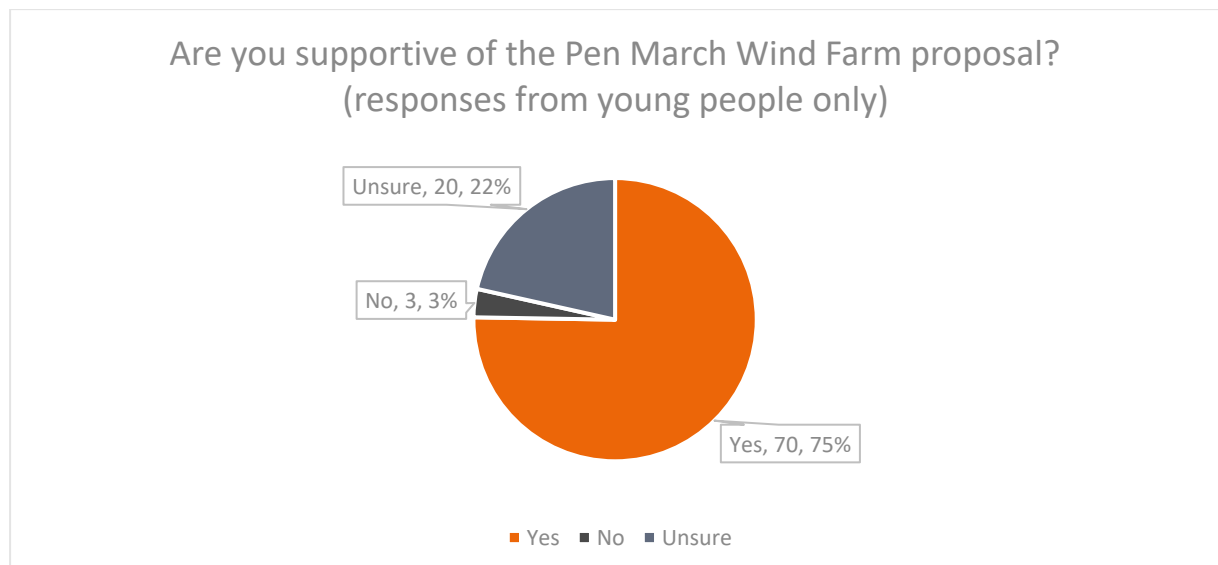
123. Taking all feedback together, in total, 69% of respondents (257 individuals) stated they were supportive of the Proposed Scheme. 20% (77 individuals) stated were not supportive, and 11% (40 individuals) stated they were unsure whether they support the proposal.



124. Looking at responses from the general public only, excluding those of young people, support for the proposed scheme is 67% (187 individuals). 26% (74 individuals) stated they do not support the proposal, with only 7% (20 individuals) stating they were unsure whether they support the proposal.



125. Looking at the views of young people only, far more were supportive of the Proposed Scheme compared to the general public, with 75% (70 young people) stating they think it should be built. Only 3% (3 young people) stated they don't think it should be built. However the young people were more undecided in their views, with 22% (20 young people), stating they weren't sure what they thought about it.

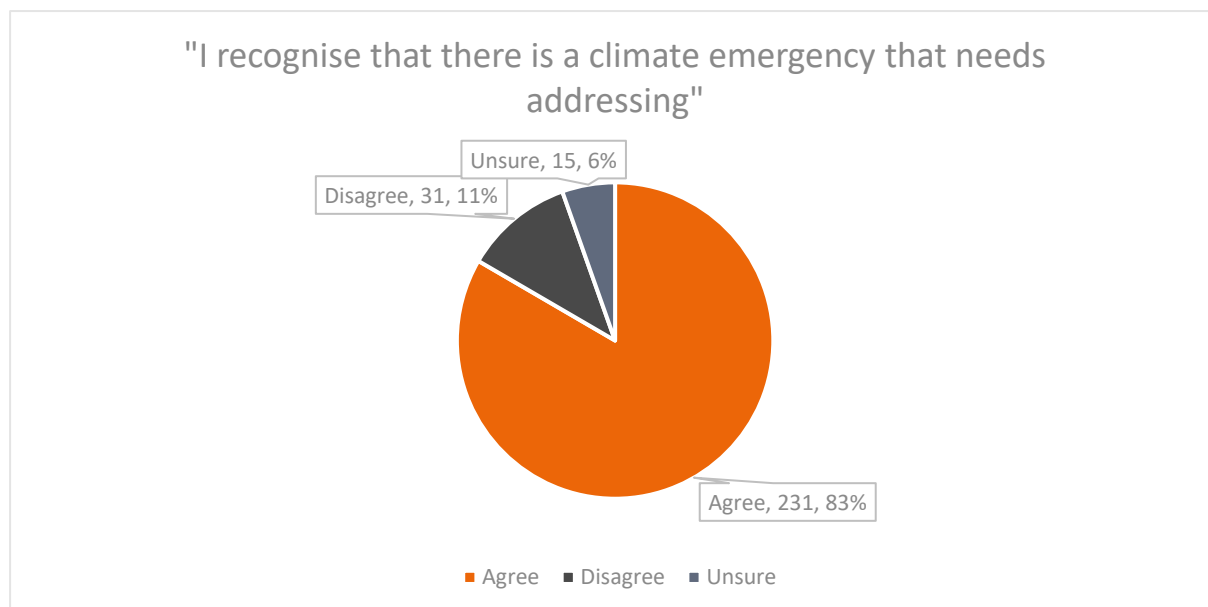


Views on Climate Change

126. The feedback card, online feedback form and feedback form provided at events asked whether respondents agreed or disagreed with the statement, 'I recognise that there is a climate emergency that needs addressing'.



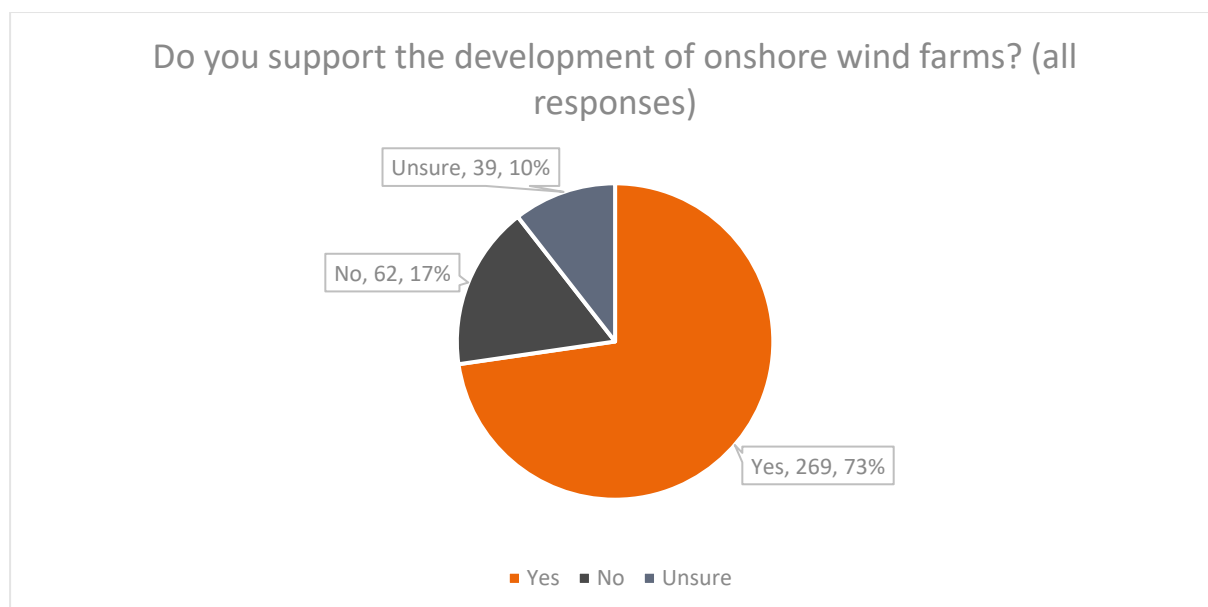
127. 83% of respondents (231 individuals) agreed with the statement. 11% of respondents (31 individuals) disagreed with the statement, while 6% (15 individuals) were unsure.



Support for onshore wind generation

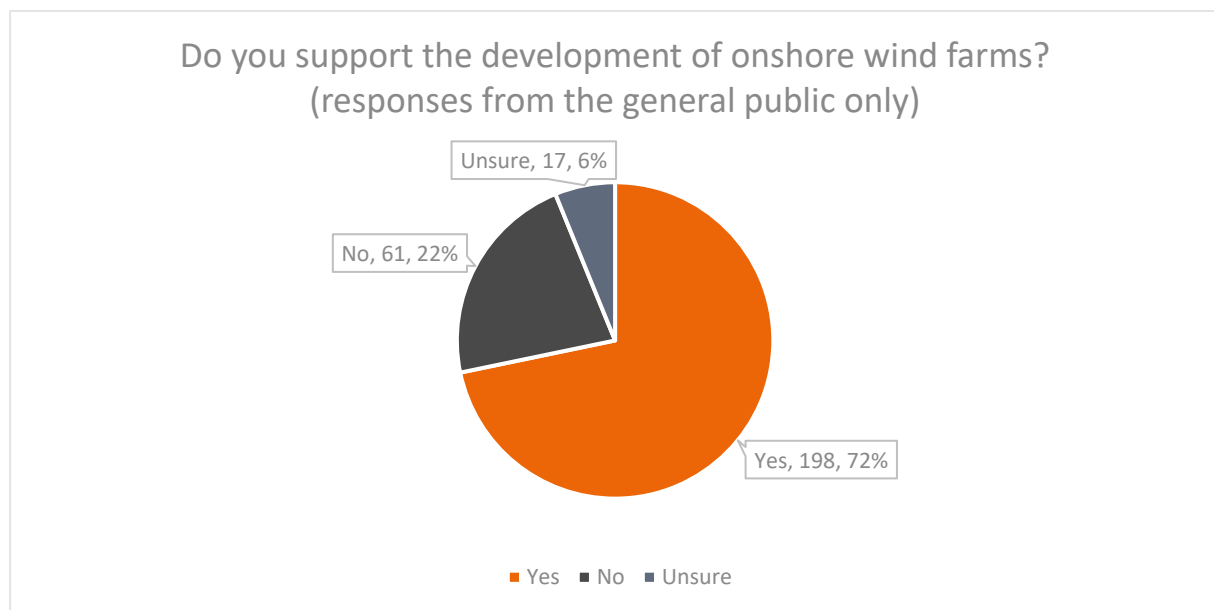
128. All feedback forms asked respondents for their views on onshore wind generation. The feedback card, online feedback form and feedback form provided at events asked, 'Do you support the development of onshore wind farms?' The young people's feedback form asked, 'In general, do you think wind farms are a good idea?'

129. 73% of all respondents (269 individuals) stated they were supportive of the development of onshore wind farms. 17% (62 individuals) stated they did not support the development of onshore wind farms, while a further 10% (39 individuals) stated they were unsure.

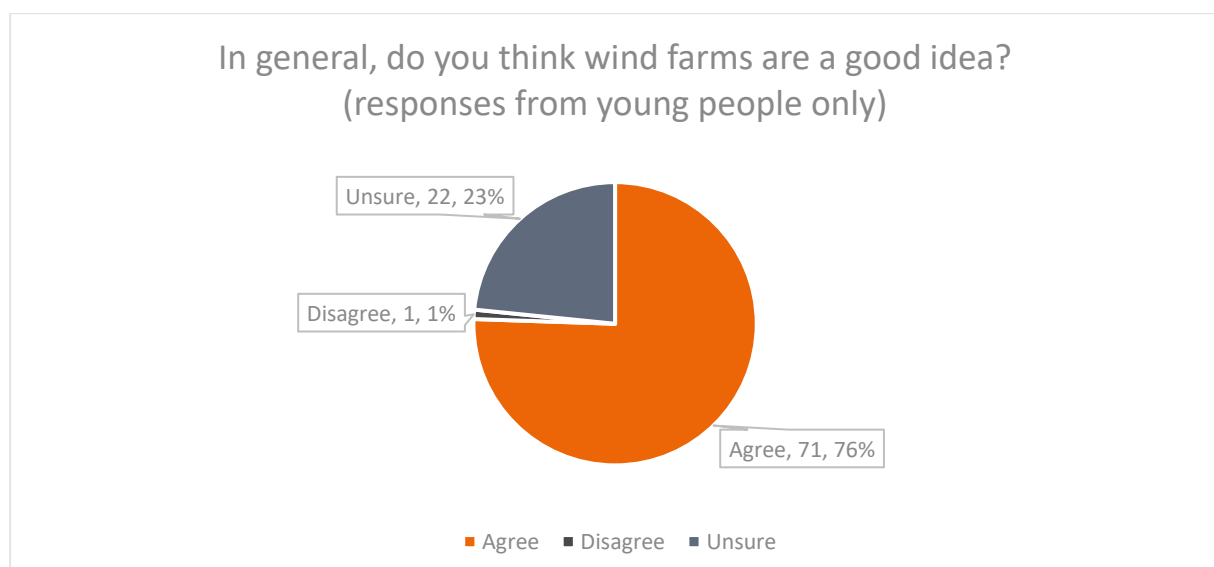


130. Support for onshore wind in the RWE consultation for the Proposed Scheme shows lower support for onshore wind than was shown in the Topical Poll conducted by Survation on behalf of RenewableUK (September 2022) which found 82% of Merthyr Tydfil and Rhymney residents support onshore wind as energy generation.

131. Looking at the responses from the general public only, excluding responses from young people, support for onshore wind farms was very similar, with 72% (198 individuals) stating they support onshore wind farms. 22% (61 individuals) stated they are not supportive, and 6% (17 individuals) were unsure whether they support the development of onshore wind farms.

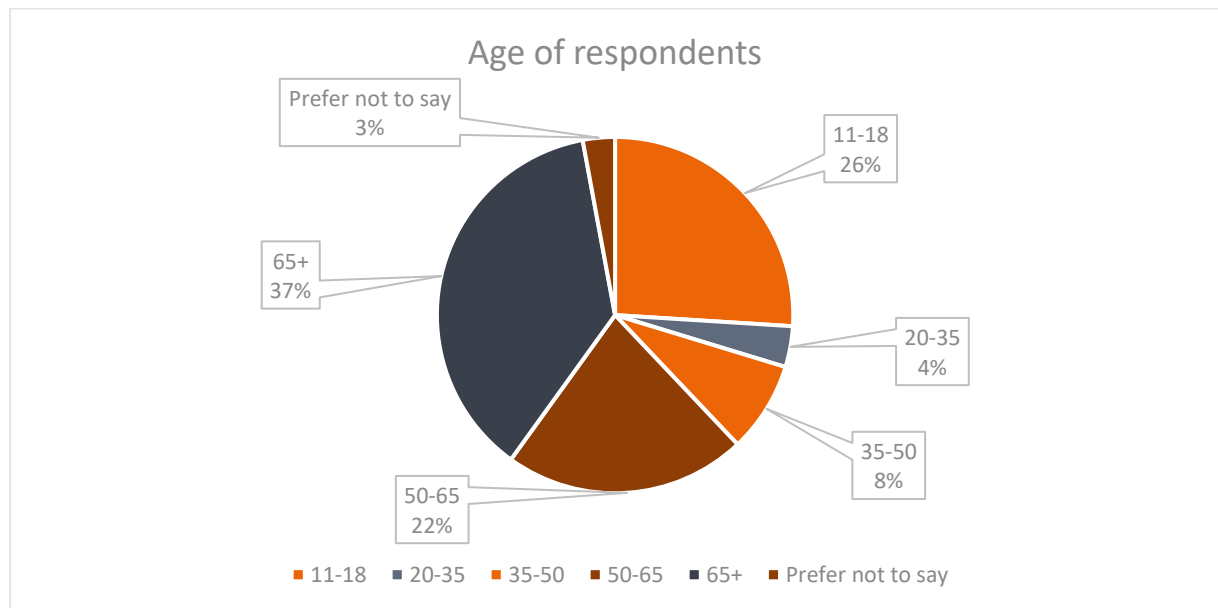


132. Looking at the feedback from young people only, more were supportive of wind farms, with 76% (71 young people) stating they think wind farms are a good idea. 1% (1 young person) stated they did not think they are a good idea. However, young people were more undecided on the issue, with 23% (22 young people) stating they were unsure whether wind farms are a good idea.



About respondents

133. The feedback card, online form and form provided at events asked respondents to indicate their age category. Of the 279 members of the general public who responded, the majority were in the 65+ category (50.2%).
134. The young person's feedback form did not explicitly ask the respondent's age. All respondents were of secondary school age (11 to 18 years).
135. The overall age of respondents is illustrated below. Unless an explicit effort is made to reach young people as RWE did, then we are only hearing from older people.

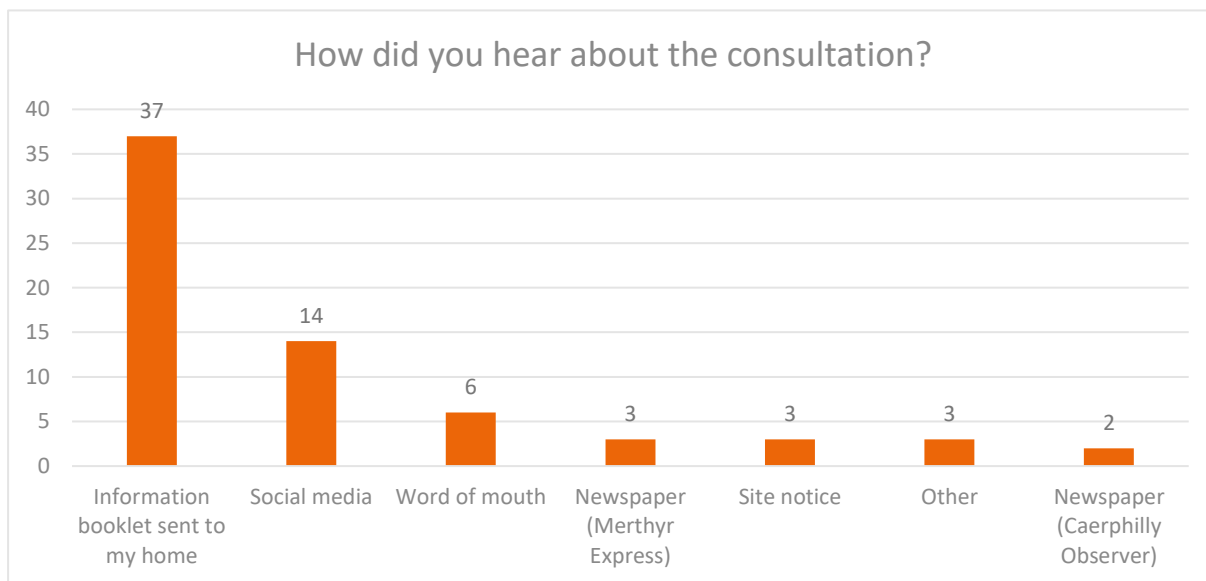


136. All respondents except for one stated that they live in the area. This was supported by postcode data. The respondent who stated they do not live in the area explained they were responding because they work in the sector.
137. Four individuals stated they were responding on behalf of an organisation. Dowlais Pony Improvement Society and Penrhaw Farm (a complex of holiday homes located near Pontsticill) were named.
138. Twenty-eight people provided their contact details in order to be kept up to date on the proposal.

About the consultation process

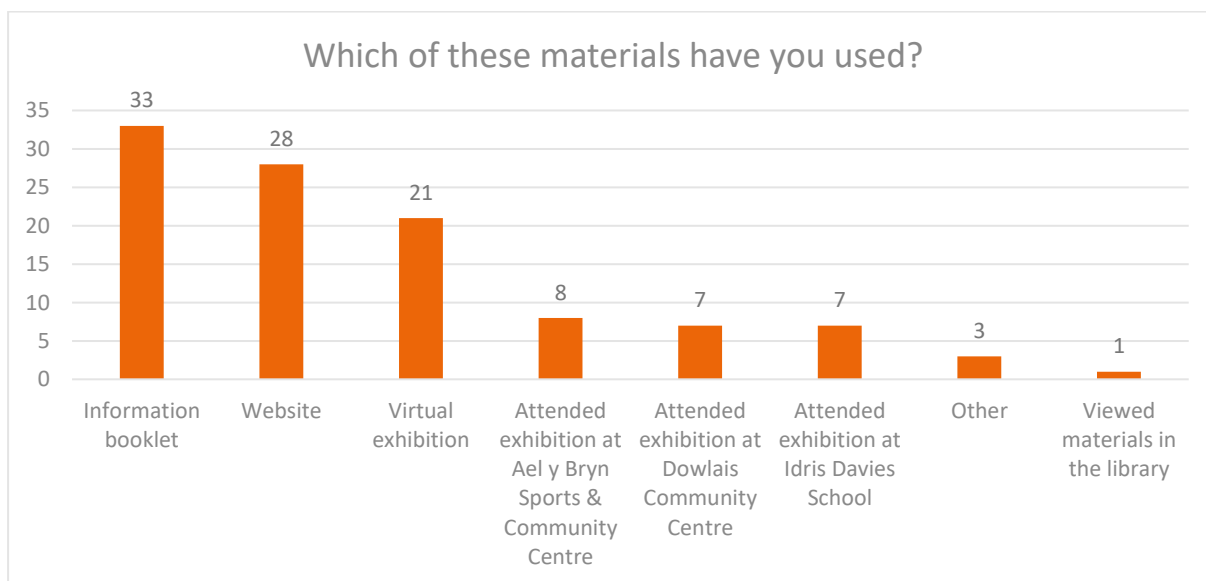
139. The online feedback form and feedback form provided at events asked respondents how they heard about the consultation. The information booklet sent to homes was the most common way people heard about the consultation with 54.4% (37 individuals) stating that as the method by which they heard about the consultation.





140. Three people stated they had heard about the consultation from other sources, namely a community group (it is not known which group), the previous online consultation (it is assumed they joined the mailing list during the previous consultation and received notice of the PAC through that), and the postcard reminder.

141. The online feedback form and feedback form provided at events asked three questions to obtain feedback about the consultation process. The first, 'Which of these materials have you used?' showed that the information booklet was the most commonly used of the materials, followed by the website, then the virtual exhibition. Only one person stated they viewed the materials in the library.



142. Of the 46 people who answered the question, ‘How useful did you find the information?’, 71.7% (33 individuals) stated they found the information very useful or quite useful.

143. Respondents were asked, ‘Do you have any thoughts on how we could have made the information more useful?’ Some comments expressed they were happy with the information provided. A couple of respondents stated they felt the information was biased. One person suggested the viewpoints weren’t were not accurate, whilst another suggested a 3D map would be useful.

144. Three respondents stated that they felt the consultation period was too short. Of these respondents, one also stated that the informal consultation held in 2021 had been held during lockdown and was not accessible by older people without internet access.

145. The following comments are illustrative of the feedback on the consultation:

“Honesty in respect of visual impact and noise calculations.”

“Less bias.”

“No. The staff in attendance were very helpful + knowledgeable and answered all of my questions.”

Key themes raised by the general public and the Applicant’s response

146. This section analyses the key themes raised in all feedback, excluding the young people’s feedback, organised by the frequency with which they were mentioned.

147. Analysis of the feedback from young people is provided in [Young People’s feedback](#).

Support for renewable energy generation and recognition of the need to address climate change

148. The strongest theme from the feedback was support for renewable energy generation and a recognition that climate change needs to be addressed. This was mentioned 36 times in feedback. Responses mentioned the positives of producing green energy, reducing use of fossil fuels, and protecting the planet for future generations.

149. This was bolstered by general support for the Proposed Scheme, with 35 additional comments which were generally supportive of the same.

150. Three respondents stated they felt that not enough is being done to deal with the climate crisis and wanted to see more turbines constructed at Pen March as they felt there was capacity on site for there to be an even greater impact.

151. Thirteen respondents stated that whilst they recognised the need for renewable energy generation, they were not supportive of onshore wind due to the visual impact. Some of these respondents also said they had doubts that it is an efficient method of energy generation, for example when there is no wind. Some expressed a preference for nuclear, offshore and tidal energy generation instead.



152. The following comments are illustrative of the feedback on renewable energy and climate change:

“Clean sustainable energy with minimum environmental impact compared to fossil fuels must be the way forward for future generations.”

“I think this is a step in the right direction for producing clean energy and helping to tackle the climate crisis. I also think the community benefit fund could be very useful for the local community.”

“Yes get on with it.”

“Would be happy for more turbines to be located here.”

“We have one of the highest tides in the world, guaranteed energy daily immaterial of the weather. We should harness that, not invest further on energy generation reliant on the wind blowing.”

153. The key themes raised and RWE’s response to them are detailed here:

Key theme	The Applicant’s response
Visual impact and proximity to homes Concerns about the potential visual impact of Pen March and proximity to homes was raised 45 times. Comments were focused on the height of the turbines and concerns that turbines will be visible to local residents. Three people suggested moving the turbines further away from homes. Some people referred to there being existing turbines in the local area, spoiling the views of the natural landscape. A number of respondents feared that if they supported this development, the wind farm would eventually grow in size gaining additional turbines. They also felt that following the construction of the Proposed Scheme there could be more developments constructed in the local area. A number of respondents feared there could possibly be negative health issues due to the proximity of the turbines to people’s homes. This included a concern for shadow flicker. One respondent feared the wind farm could have a negative impact on future tourism opportunities in Merthyr Tydfil and Rhymney. Another respondent raised a concern about the potential visual impacts of cables and pylons and suggested using underground cables. The following comments are illustrative of the feedback on visual impact: <i>“The wind farms destroy the natural beauty of the countryside.”</i> <i>“They are a huge eyesore they’ve already ruined multiple</i>	The Applicant welcomes the responses made and acknowledges the concerns raised in relation to visual impact. Chapter 5 (Volume 2) of the Environmental Statement (ES), ‘Landscape and Visual’, details the Landscape and Visual Assessment (LVIA) undertaken to consider potential effects on visual amenity and cumulative effects. The Proposed Scheme has been designed to minimise the effect on the surrounding landscape and visual resource. The wind turbine layout design has evolved with the intention of presenting a simple, well-balanced image of the Proposed Scheme in the majority of views. The design also considered other environmental and technical constraints found within the Site and wider environs. Further detail is provided within Chapter 2 (Volume 2) of the ES, Site Selection and Design Evolution. In line with the Town and Country Planning (EIA) (Wales) Regulations 2017 (as amended) the ‘EIA

Key theme	The Applicant's response
<i>views in and around the valleys with other ones."</i> <i>"There are already too many turbines in the area."</i> <i>"Residents are worried about the affect 'flicker' could have on them and their families, and the long-term effects this could have on both their mental and physical wellbeing."</i>	regulations'), a cumulative assessment of the Proposed Scheme in combination with other committed developments is included within Volume 2 of the ES. Chapter 5 (Landscape and Visual) of the ES does not identify any significant cumulative landscape or visual amenity effects with existing developments. A Shadow Flicker Impact Assessment has been completed and is reported within Volume 2 of the ES, specifically, Chapter 12 (Other EIA Topics). A total of 24 residential receptors were identified within the assessment's study area (1.5km). The assessment concludes that no significant adverse effects were expected on any of the identified shadow flicker receptors. The site infrastructure is not located within the Bannau Brycheiniog National Park (BBNP) and would not be visible from the majority of the BBNP other than at the edges of the site and southernmost boundary of BBNP where tracks of closer turbines would be visible. In the central area of the BBNP where the Special Qualities are more sensitive to changes proposed, following the detailed assessment of Special Qualities within this area, the effects are considered to be of a medium-low level of magnitude and the overall effect of the proposed scheme on the BBNP and its special qualities is considered to be not significant for the majority of the BBNP. The exception to this is for an area of approximately 3km at the southern edges of the BBNP which



Key theme	The Applicant's response
	would experience moderate level significant effects due to the closer proximity of the proposed scheme.
Noise Eighteen people raised concerns about the potential impact of noise, both in terms of the operation of the turbines, and during construction. Respondents expressed concern about the potential impact of noise on health and the proximity to homes. The following comments are illustrative of the negative feedback on noise: <i>"Concern about noise of turbines mainly."</i> <i>"The noise from the construction will be unbearable, the heavy noise pollution from the turbines will aggravate the senses and have an adverse effect on mental health."</i>	RWE welcomes the responses made and acknowledges the concerns raised in relation to noise. The potential effects of the Proposed Scheme on noise receptors have been addressed in Volume 2 (Chapter 9 – Noise) of the ES. The assessment concludes that there would be no unacceptable adverse effects on noise receptors.
Wildlife and biodiversity Twenty-four respondents expressed concern about potential negative impacts on local wildlife, biodiversity and the environment in general. Respondents discussed protected species and wildlife including birds and bats in the local area they felt would not be protected or would be inadvertently affected. In addition, respondents felt natural habitats would be lost including peatbogs and some of the last remaining untouched areas of the local environment. Of the 24 comments about wildlife and biodiversity, 6 people raised concerns about the potential negative environmental impact of constructing and operating the proposed scheme. This included questions regarding the carbon footprint of manufacturing and installation, how turbines are disposed of at after decommissioning the end of their life and impact of concrete on peat. The following comments are illustrative of feedback received on wildlife and biodiversity: <i>"Decimation of a natural habitat. Bat feeding grounds are right across the common. There are hen harriers, red kite, little owls, Merlins, lapwings, golden plovers, at least 10 pairs of curlews, barn owls and short eared owls who use that whole reserve."</i> <i>"All the construction will upset the biodiversity of the common, including small mammals, toads, frogs, newts,</i>	A detailed and comprehensive suite of terrestrial and ornithological surveys were completed to inform the EIA. The potential effects of the Proposed Scheme (during construction and operation) on important ecological features has been considered in Volume 2 of the ES, specifically, Chapter 7 (Ecology) and Chapter 8 (Ornithology). The EIA mitigation hierarchy has been followed to avoid and minimise effects upon the most important habitats as far as possible. Compensation for the permanent loss of habitats within the site, and additional biodiversity enhancement, would be provided by way of offsite mitigation set out in the Outline HMP (Volume 4 of the ES - Technical Appendix 7.6).



Key theme	The Applicant's response
<i>shrews, lizards etc their habitat will be destroyed."</i> <i>"Obviously wind generation of electricity has it's (sic) benefits, although it should not be forgotten that the redundant turbine blades are not recycled, and 90% end up in landfill."</i>	An assessment of the carbon balance of the Proposed Scheme is provided in Volume 2 of the ES, specifically, Chapter 12 (Other EIA Topics). The assessment considers the carbon losses and savings across the project lifecycle stages (construction, operation and decommissioning / site restoration). The Proposed Scheme is anticipated to have an operational life of 35 years, after which it would be decommissioned, and the turbines dismantled and removed in accordance with best practice at that time. The net GHG emissions from the construction and decommissioning are predicted to be offset by emissions savings from the Proposed Scheme within 1.4 years of it becoming operational.
Local energy bills There was particular interest in the topic of energy bills, including subsidised tariffs or free energy for local residents, with 13 respondents raising the topic. This was expected, given the current cost of living crisis and high energy bills. Of these respondents, around half felt strongly that there should be an offer of reduced energy bills to compensate local residents due to the proximity to the development and disruption they may encounter during construction. Others were under the impression that they would receive cheaper energy bills, or suggested in a neutral way that a benefit of the project should be reduced energy bills. The following comments are illustrative of the feedback on local energy bills: <i>"How much will local residents have taken off our electricity bills?"</i> <i>"The proposed wind turbines will not lower the energy costs of local residents."</i>	At the time of the consultation, energy bills were a serious concern for many people due to the global energy crisis, Russia's war in Ukraine, higher than average energy bills and winter energy demands. At present, the Applicant is unable to directly reduce the energy bills of local residents. As a key partner in the delivery of the UK's green energy ambitions, the Applicant welcomes the UK Government's initiative to accelerate the pace of delivery of UK-wide major green energy infrastructure. Alongside solar - wind energy is the cheapest source of electricity generation. Unsubsidised onshore wind energy is cheaper than any other energy source, including

Key theme	The Applicant's response
	conventional power generation sources such as coal and gas. Onshore wind already does and will continue to play a critical role in the UK's current and future energy mix. The UK must accelerate the development of all forms of cost-effective renewable and low carbon energy generation in order to achieve energy security, and over time, reduce costs.
Energy security Nine respondents stated that one benefit of the development would be increased energy security and self-sufficiency, in light of the current global energy crisis. The following comments are illustrative of the feedback on energy security: <i>"It is vital we have our own clean supply of energy, improving our energy security and ensuring we are less reliant on other states like Russia."</i> <i>"Because of the situation we are now in with high energy prices we need to be looking to fund supplies of energy so that we are not dependent on other countries to supply some of it."</i>	The Applicant recognises that at the time of the PAC the issue of energy security was high profile, due to Russia's war in Ukraine, and global disruption to energy supplies. This heightened awareness is demonstrated by the number of people raising this as a reason to support the Proposed Scheme.
Community benefits Potential community benefits arising from Pen March were mentioned 15 times. The Community Benefit Fund was mentioned by seven people. Three people mentioned it as a positive element which could support local people and organisations. Two people mentioned it in negative terms, stating it would not benefit all local people, and that it was a small incentive in exchange for 'ruining the countryside'. Two people mentioned the Community Benefit Fund in a neutral way. Some practical uses for the fund were suggested, including enhanced lighting on the main road and support for local charities. There was interest in the potential positive impact the Proposed Scheme could have on the local economy, with employment opportunities for local people and supply chain contracts for local businesses being mentioned six times.	The Applicant is committed to supporting the communities that host renewable energy projects by offering flexible community benefits packages. In the last decade, wind farms operated by the Applicant in Wales have contributed over £10 million to local communities. Local people are using these funds, to help to generate their own strong, sustainable future. The Applicant has already begun to engage with the local supply chain, having held a Business Breakfast for local suppliers in February 2022. The Applicant is committed to



Key theme	The Applicant's response
Two noted the possible educational benefits to young people within the local community that could arise in the form of apprenticeships, learning centres or school trips. The following comments are illustrative of feedback received on community benefits: <i>"The community benefit fund is great for the community."</i> <i>"Some of the money from the community benefit scheme should be reinvested into the common to support sustainable land management, access, ASB issues etc"</i> <i>"Involving students from local high schools to participate in activities that enrich their education about engineering/design/environment/protecting heritage/culture/funding & finance/etc"</i> <i>"Delivering green technology and jobs to the valleys. Community + local economy boost"</i> <i>"I would prefer this to be publicly owned returning profits to the community."</i> <i>"Locally provider, clean energy, local jobs."</i>	using local suppliers in the construction and operation of its projects wherever possible.
Access, Public Rights of Way (PRoW) and traffic Public access to the site was raised six times by people concerned that access to the area for recreation would be lost. It is apparent from the feedback that local residents enjoy using the area recreationally. Respondents expressed concern that developing this site would restrict access to the existing public rights of way. Four respondents suggested there was an opportunity for RWE to enhance the area for local people by developing additional walkways, cycle paths, benches and a car park. Two respondents feared that the Proposed Scheme would attract too many people from outside the area to visit the wind farm, disturbing the usually quiet area. One respondent who lives close to the proposed site had security concerns of trespassing when the Proposed Scheme was being constructed. Concern about disruption to traffic, congestion and pollution was raised four times. The following comments are illustrative of the feedback on access, PRoW and traffic: <i>"If the land is thoughtfully treated - it would be amazing to have some runnable routes and trails similar to Afan Valley</i>	The potential effects of the Proposed Scheme on land use interests has been assessed within Volume 2 (Chapter 12 – Other EIA Topics) and Volume 4 (Appendix 10.1 – Transport Assessment) of the ES. Both assessments conclude that any potential effects on land use (related to the Northern Common and CRoW Access Land) and access to the Site have been suitably mitigated as part of the Proposed Scheme. Mitigation includes; replacement common land, temporary fencing (where required for safety) during construction, Construction Environmental Management Plan, and Right of Way Management Plan. During operation, access to the land will not be constrained by the Proposed Scheme. The potential effects of the Proposed Scheme on traffic,



Key theme	The Applicant's response
<i>and other wind farm sites around south Wales."</i> <i>"Opportunity to develop cycle routes within the proposal and open up that part of the area which would off set some of the concerns."</i> <i>"...maybe some parking to allow people to access the common."</i> <i>"The proposed development will lead to increased congestion, noise, pollution and disruption for local people."</i>	transport, and access has been assessed within Volume 2 (Chapter 10) of the ES.
Shared ownership The online and printed feedback form asked, 'RWE Renewables is discussing shared ownership with Caerphilly Council and Merthyr Tydfil County Borough Council in relation to the Pen March project so that local communities get a direct stake in the project. Do you think that's a good idea?' Of the 47 responses to the question, 45% (21 individuals) stated that they believed shared ownership was a good idea. 36% of respondents (17 individuals) did not think shared ownership was a good idea and a further 19% (8 individuals) were unsure whether shared ownership was a good idea. A follow up question asked respondents, '<u>Do you have any further comments about shared ownership?</u>' Comments reflected a lack of understanding about shared ownership and what it means for residents. Some people asked whether shared ownership would result in cheaper electricity or council for residents. Several people expressed concern that shared ownership was used as a way to achieve planning consent. The following comments are illustrative of feedback on shared ownership: <i>"Shared ownership must directly benefit the population through cheaper electricity bills or council tax."</i> <i>"I am concerned about potential maintenance bills being passed onto the residence (sic) of Merthyr and Caerphilly council under shared ownership."</i>	The Welsh Government has a target for at least 1 gigawatt of renewable electricity and heat capacity to be locally owned by 2030 and the expectation is for all new energy projects to have at least an element of local ownership from 2020. The Applicant is pleased to have signed a Memorandum of Understanding with Caerphilly County Borough Council in relation to shared ownership, and Heads of Terms (HoTs) have been signed with Merthyr Tydfil County Borough Council. Discussions are at early stages and the model of shared ownership has not been agreed.
Other issues Five people stated they <u>do not believe in climate change</u> and felt investing in renewables was a waste of money with four respondents suggesting a preference for coal mines. Two respondents raised concerns regarding the preservation	RWE notes that some people do not recognise the climate emergency. A Cultural Heritage Assessment has been completed and reported within Volume 2 of the ES,



Key theme	The Applicant's response
of local <u>historical sites</u> . These included an ancient well and a nearby historical burial ground.	specifically, Chapter 11 (Cultural Heritage). The scope of this assessment was to consider if the Proposed Scheme would result in any significant effects to cultural heritage assets within and beyond the Site. The assessment was informed by a detailed historic environment desk-based assessment which considered designated assets (including scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, registered battlefields and World Heritage sites) and non-designated assets.

Young Persons' Feedback

154. The Applicant is delighted to have received 98 completed forms from young people. The feedback provided is thoughtful and insightful.

Climate change

155. Question one of the young persons' feedback form asked, 'Write three things that you, or people you know, are doing to tackle climate change'.
156. The most common response, raised 78 times, referred to recycling and effective waste disposal to limit littering. Plastic was frequently mentioned, with reducing, reusing and recycling plastics being mentioned 20 times.
157. The second most popular topic raised 41 times was transport. Respondents said that using public transport, walking more, or using electric vehicles was a method of tackling climate change.
158. Renewable energy generation, including the use of wind and solar farms, was mentioned 22 times, alongside reducing energy consumption, which was raised 20 times.
159. The following comments are illustrative of young people's feedback in response to this question:

"Recycling."

"Litter picking."

"Not using as much plastic."

"I ride my bike and scooter and don't have lifts off my father and reuse shopping bags and recycle all my plastic."



Government action on climate change

160. Question two asked, 'What do you think governments need to do to tackle climate change?' There were many suggestions raised, overall, the main suggestion raised was recycling and effective waste disposal which was raised 32 times. Respondents suggested governments could provide more bins to prevent people from littering and encourage recycling.
161. The second most common suggestion was regarding energy which was raised 24 times. Of these, 10 respondents suggested that governments should invest in renewable energy generation and 14 respondents suggested that governments should help reduce dependency on fossil fuels. One respondent suggested that all new homes should be built with solar panels installed.
162. The third most common suggestion was green transport which was raised 22 times. Respondents suggested that governments should invest in public transport, subsidise electric vehicles and 11 respondents suggested governments invest in providing more electric vehicle charging points.
163. The following comments are illustrative of young people's feedback in response to this question:
- "Make new laws and try to persuade people to stop littering again."*
- "More electric stuff instead of oil."*
- "Have more charging points."*
- "For all new houses to be built with solar panels."*

Support for wind farms

164. Question three asked, 'In general, do you think wind farms are a good idea?' An analysis of the responses to this question is provided at [Support for onshore wind generation](#).

Concerns

165. Question four asked, 'Do you have any concerns or worries about a wind farm being built near where you live?' Fifty-two respondents stated they did not have any concerns and a further five respondents stated that they thought the project was a good idea.
166. Of those with concerns, the most common concern among young people was the proximity to homes and possible turbine collapse, with ten respondents stating this. A further six respondents noted visual impact as a concern.
167. Five respondents noted that taking away the common land was a concern of theirs. Lastly, three respondents had concerns regarding the efficiency of wind farms and two respondents stated a concern for the local wildlife.
168. The following comments are illustrative of young people's feedback in response to this question:
- "No, I think wind turbines are great ideas."*
- "Yes because a propeller can fall on a house."*

Support for the Proposed Scheme

169. Question five asked, 'In terms of the Pen March Wind Farm, please tick one of the following boxes: (1) I think it should be built; (2) I don't think it should be built; (3) I'm not sure what to think about it'. Analysis of the responses to this is provided at [Support for Pen March Wind Farm](#).



Community Benefit Fund

170. Question six asked, 'If Pen March Wind Farm goes ahead, there will be some money to help in the community. What could it be used for?'
171. Of the 89 young people who answered the question, the most popular suggestion, made by 23 young people, was for the money to be used to help the local community, for example used to fund local social and sports clubs, to build more facilities for the local community including shops, attractions, parks, improve roads and support local schools.
172. The second most popular suggestion, suggested by 24 young people, was for the money to be used to tackle climate change locally. Of these respondents, 17 stated the money could be used to build more wind farms while a further 5 respondents stated the money could be used to run educational visits to the Proposed Scheme.
173. The current cost of living crisis was referenced by eleven of the young people who responded. Three young people explicitly mentioned 'cost of living', four explicitly mentioned 'lower energy prices', whilst another four mentioned 'bills'. They suggested the community benefit fund could be used to help local people with the cost of living.
174. The following comments are illustrative of young persons' feedback in response to this question:

"Help more people in need."

"Charities and homeless people build more parks."

"Help the cost of living crisis."

Local benefits for young people

175. Finally, the last question asked, 'What else would you like to see RWE doing in the area to benefit local young people?' While there were several suggestions, the most common response, raised 20 times, was for further educational opportunities to be provided. These included educational trips to the wind farm, suggested by 14 respondents, and more educational activities for local schools regarding renewable energy.
176. The second most common response, stated 15 times, was for additional facilities to be provided for young people. These include parks, shops and arcades. Lastly, 12 respondents suggested that there could be more funding provided for community services including community centres and youth and sports clubs. Other suggestions made included providing further renewable energy projects in the area and funding local initiatives to tackle climate change.
177. The following comments are illustrative of young persons' feedback in response to this question:
- "Visits to the wind farms and learn about it."*
- "Parks, cafes, coffee shops and skate parks."*
- "An arcade."*
- "A cafe with internet and arcade next to it."*
- "Make a community centre."*



Appendix A: Maps

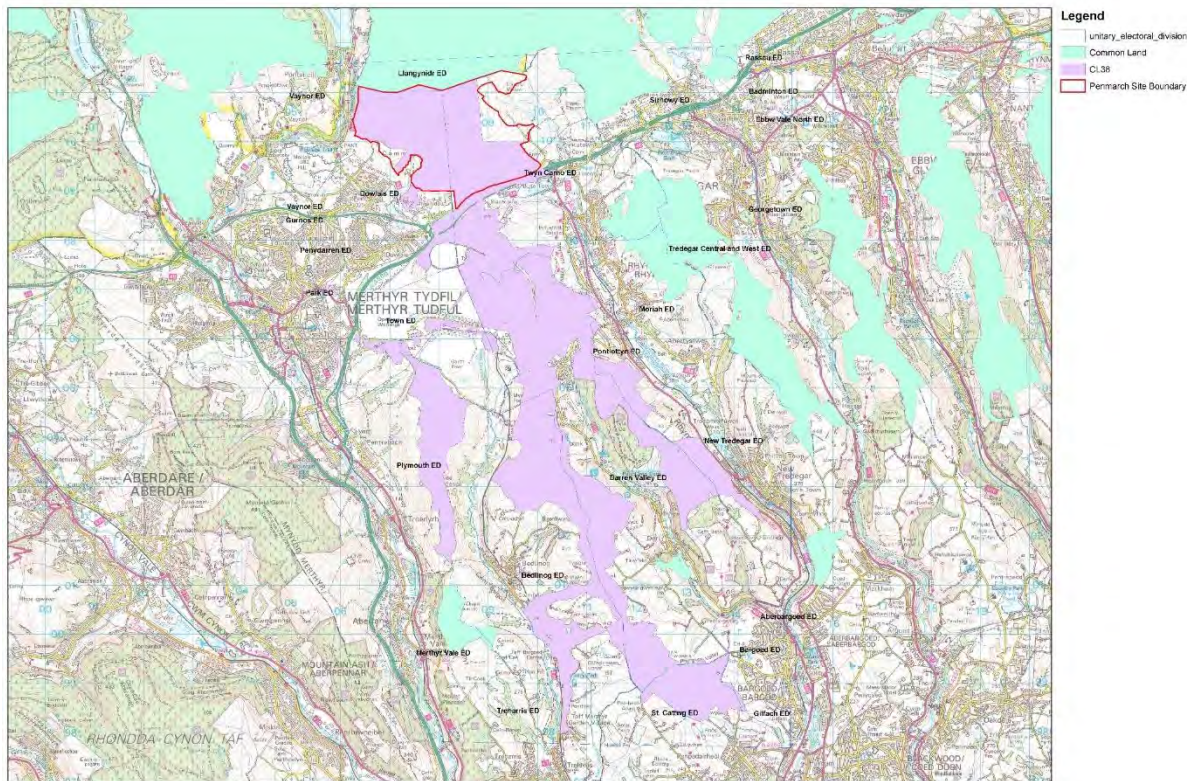


Figure 1 : Electoral Division boundaries

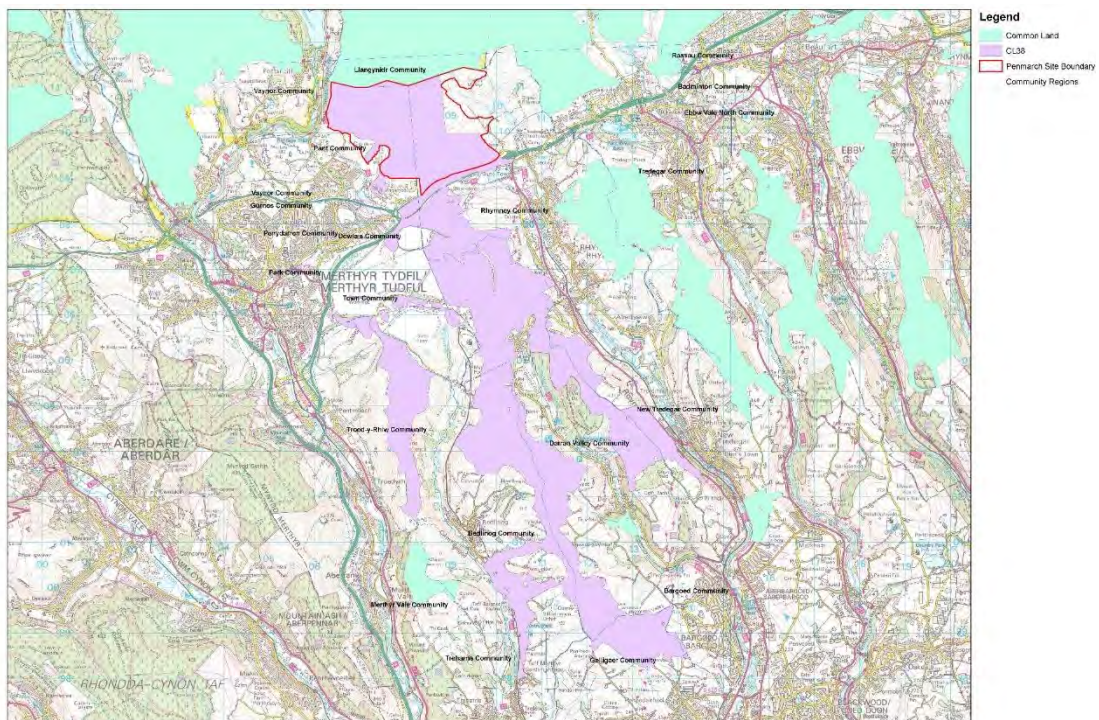


Figure 2 : Community boundaries



Appendix B: Covering letter to Community Consultees



Pen March Wind Farm
RWE Renewables UK Swindon Ltd
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

<https://penmarch.co.uk/penmarch@rwe.com>
01685 701354

3rd November 2022

Dear Councillor 

**The Developments of National Significance (Procedure) (Wales) Order 2016
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 8 AND 9(2)
Proposed development at Pen March Wind Farm (PEDW Ref No: DNS/3253147)**

I am writing to notify you as a Community Consultee that RWE Renewables UK Swindon Ltd intends to submit a planning application to the Welsh Ministers for the development of Pen March Wind Farm at Gelligaer and Merthyr Common.

In line with Articles 8 and 9(2) of the Developments of National Significance (Procedure) (Wales) Order 2016, and section 61Z(4) of the Town & Country Planning Act 1990, please find enclosed formal notice of the consultation on the proposed development.

We are seeking your views on the development and have made the contents of the draft planning application available electronically at <https://penmarch.co.uk/>.

Hard copies of the draft Non-Technical Summary and the draft Environmental Statement are available to view at the following public events:

Wed 16th November 2022 3pm – 6pm Idris Davies School Lower School Hall Abertysswg Road Abertysswg, Tredegar NP22 5XF	Wed 23rd November 2022 3pm – 7pm Ael y Bryn Sports & Community Centre Aneurin Terrace Rhymney, Tredegar NP22 5DR	Sat 26th November 2022 10am – 2pm Dowlais Community Centre Station Rd Dowlais Merthyr Tydfil CF48 3LP
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Any consultation responses should be sent to penmarch@rwe.com or RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX by **Thursday 15th December 2022**.

RWE Renewables UK Limited: Registered in England and Wales no. 3758404
Registered Office: Greenwood House Westwood Way Westwood Business Park Coventry United Kingdom CV4 8PB
RWE Renewables Management UK Limited: Registered in England and Wales no. 12087808
Registered Office: Windmill Hill Business Park Whitehill Way Swindon Wiltshire SN5 6PB
RWE Renewables UK Swindon Limited: Registered in England and Wales no. 02550622
Registered Office: Windmill Hill Business Park Whitehill Way Swindon Wiltshire SN5 6PB.



The application is programmed to be submitted to the Welsh Ministers in 2023. Once submitted, you will be able to monitor its progress and make further comments via Planning and Environment Decisions Wales (PEDW)'s planning casework webpage <https://planningcasework.service.gov.wales/>.

Yours sincerely,

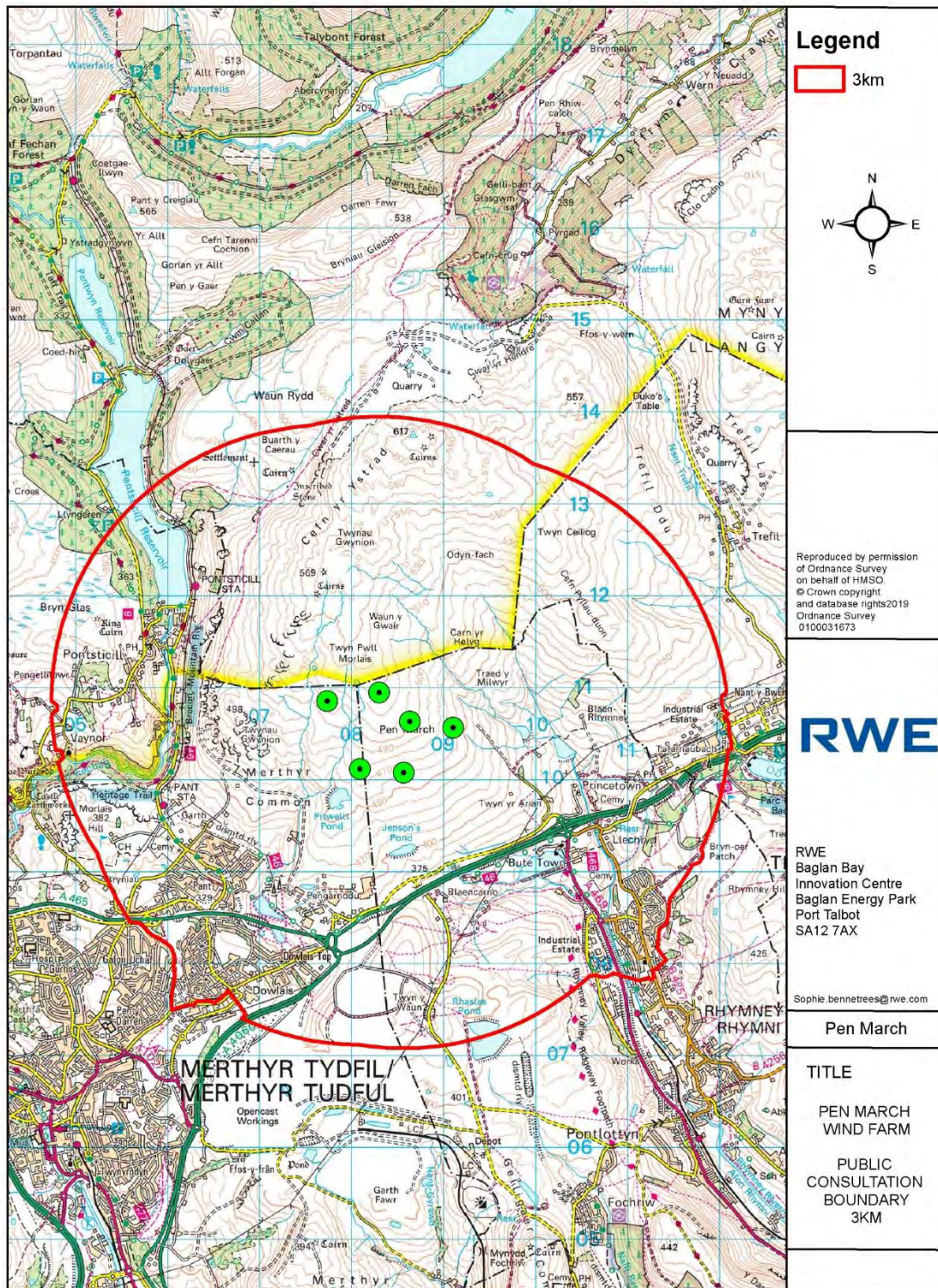


Jenny Cowley
Development Project Manager
Pen March Wind Farm

Enc. Schedule 1 Notice



Appendix C: Consultation Zone



45

Appendix E: Freepost Feedback Card



Freepost Plus RUEB-GYKA-JARJ
RWE Renewables
Baglan Bay Innovation Centre
Baglan Energy Park
Central Avenue
Baglan
PORT TALBOT
SA12 7AX



RWE

Feedback form Ffurflen adborth

If you have further comments
you can submit these online at
www.penmarch.co.uk

Os oes gennych sylwadau
pellach gallwch eu cyfiwyno
ar-lein yn www.penmarch.co.uk

.01
Are you supportive of the Pen March Wind Farm proposal?
A ydych yn cefnogi cynnig Fferm Wynt Pen March?

☐ Yes Ydw
 ☐ No Nac ydw
 ☐ Unsure Ansicr

.02
"I recognise that there is a climate emergency that needs addressing"
"Rwy'n cydnabod bod argyfwng hinsawdd sydd angen mynd i'r afael ag ef"

☐ Agree Cytuno
 ☐ Disagree Anghytuno
 ☐ Unsure Ansicr

.03
Do you support the development of onshore wind farms?
A ydych yn cefnogi datblygu ffermydd gwynt ar y tir?

☐ Yes Ydw
 ☐ No Nac ydw
 ☐ Unsure Ansicr

.04
How old are you? Faint yw eich oedran?

☐ Under 20 Dan 20
 ☐ 35-50
 ☐ 65+

☐ 20-35
 ☐ 50-65
 ☐ Prefer not to say
Mae'n well gen i beidio â dweud

.05
Additional comments: Sylwadau ychwanegol:



Appendix F: Press adverts

Thursday, November 10, 2022 **Classified Advertising** www.walesonline.co.uk WMR1ST 27

Services	Public Notices						
Building Repairs/Alterations	Other						
	RWE RWE Renewables is proposing a wind farm at Pen March Have your say The consultation runs until 15 December Mae RWE Renewables yn cynnig fferm wynt ym Mhen March Dweud eich dweud Mae'r ymgynghoriad yn rhedeg tan 15 Rhagfyr Find out more online or visit us at one of our public exhibitions: Darganfad mwy ar-lein neu ymweld â ni yn un o'n harddangosfeydd cyhoeddus:  <table border="1"> <tbody> <tr> <td>Abertyswg Idris Davies School Ysgol Idris Davies</td> <td>15.00 – 18.00 Wednesday 16 November Dydd Mercher 16 Tachwedd</td> </tr> <tr> <td>Rhymney – Rhymni Ael y Bryn Sports & Community Centre Canolfan Chwaraeon a Chymunedol Ael y Bryn</td> <td>15.00 – 19.00 Wednesday 23 November Dydd Mercher 23 Tachwedd</td> </tr> <tr> <td>Dowlais Dowlais Community Centre Canolfan Gymunedol Dowlais</td> <td>10.00 – 14.00 Saturday 26 November Dydd Sadwrn 26 Tachwedd</td> </tr> </tbody> </table> Leading the way to a green energy world <i>Arwain y ffordd i fydd o ynni gwyrdd</i> penmarch@rwe.com www.penmarch.co.uk 01685 701354	Abertyswg Idris Davies School Ysgol Idris Davies	15.00 – 18.00 Wednesday 16 November Dydd Mercher 16 Tachwedd	Rhymney – Rhymni Ael y Bryn Sports & Community Centre Canolfan Chwaraeon a Chymunedol Ael y Bryn	15.00 – 19.00 Wednesday 23 November Dydd Mercher 23 Tachwedd	Dowlais Dowlais Community Centre Canolfan Gymunedol Dowlais	10.00 – 14.00 Saturday 26 November Dydd Sadwrn 26 Tachwedd
Abertyswg Idris Davies School Ysgol Idris Davies	15.00 – 18.00 Wednesday 16 November Dydd Mercher 16 Tachwedd						
Rhymney – Rhymni Ael y Bryn Sports & Community Centre Canolfan Chwaraeon a Chymunedol Ael y Bryn	15.00 – 19.00 Wednesday 23 November Dydd Mercher 23 Tachwedd						
Dowlais Dowlais Community Centre Canolfan Gymunedol Dowlais	10.00 – 14.00 Saturday 26 November Dydd Sadwrn 26 Tachwedd						
	Planning						

Local pick up, what a great idea



RWE

**RWE Renewables is
proposing a wind
farm at Pen March**

**Mae RWE Renewables
yn cynnig fferm wynt
ym Mhen March**

Have your say

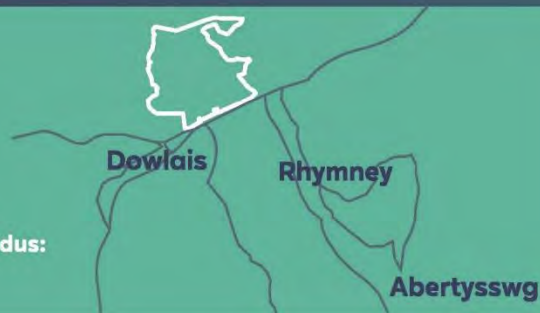
Dweud eich dweud

**The consultation runs
until 15 December**

**Mae'r ymgynghoriad yn
rhedeg tan 15 Rhagfyr**

**Find out more online or
visit us at one of
our public exhibitions:**

**Darganfod mwy ar-lein
neu ymweld â ni yn un o'n
harddangosfeydd cyhoeddus:**



Rhymney – Rhymni

Ael y Bryn Sports & Community Centre
Canolfan Chwaraeon a Chymunedol Ael y Bryn

15.00 – 19.00

Wednesday 23 November
Dydd Mercher 23 Tachwedd

Dowlais

Dowlais Community Centre
Canolfan Gymunedol Dowlais

10.00 – 14.00

Saturday 26 November
Dydd Sadwrn 26 Tachwedd

Leading the way to a green energy world

Arwain y ffordd i fyd o ynni gwyrdd

penmarch@rwe.com

www.penmarch.co.uk

01685 701354



Appendix G: Postcard



RWE Renewables is proposing a wind farm at Pen March

We recently sent you an information booklet about our proposals for a wind farm at Pen March with up to 6 turbines and an installed capacity of around 30 MW. You can find lots of information online including the draft Environmental Statement, speak to us at one of our events, or by phone, or provide your feedback by e-mail or online until 15 December. There was also a freepost feedback form in the information pack we sent you.

Mae RWE Renewables yn cynnig fferm wynt ym Mhen March

Yn daiweddar anfonwyd llyfryn gwybodaeth atoch am ein cynigion ar gyfer fferm wynt ym Mhen March gyda hyd at 6 tyrbîn a chapasiti gosodedig o tua 30 MW. Gallwch ddod o hyd i lawer o wybodaeth ar-lein gan gynnwys y Datganiad Amgylcheddol drafft, siarad â ni yn un o'n digwyddiadau, neu dros y ffôn, neu roi eich adborth trwy e-bost neu ar-lein tan 15 Rhagfyr. Roedd ffurflen adborth rhadbost hefyd yn y pecyn gwybodaeth a anfonwyd atoch.

Exhibitions are being held at:

Mae arddangosfeydd yn cael eu cynnal yn:

Ysgol Idris Davies School
Lower School Hall
Neuadd yr Ysgol Isaf

15.00 - 18.00

Wednesday 16 November
Dydd Mercher 16 Tachwedd

Abertyswg NP22 5XF

Canolfan Chwaraeon a
Chymunedol Ael y Bryn
Sports & Community Centre

15.00 - 19.00

Wednesday 23 November
Dydd Mercher 23 Tachwedd

Rhymney/Rhymni NP22 5DR

Canolfan Gymunedol
Dowlais
Community Centre

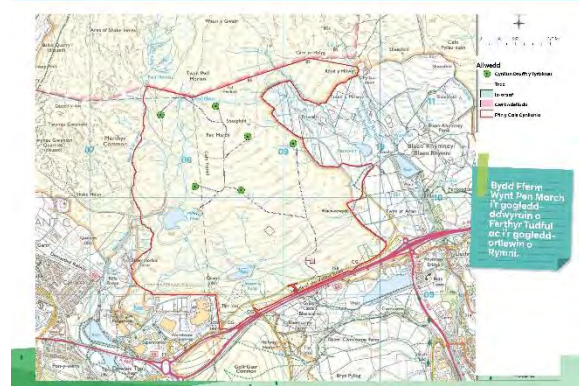
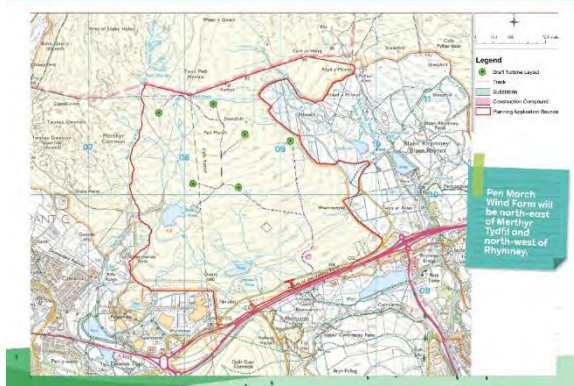
10.00 - 14.00

Saturday 26 November
Dydd Sadwrn 26 Tachwedd

Dowlais CF48 3LP



Appendix H: Young Persons' Information Booklet



Appendix I: Young Persons' Feedback Card

Feedback form

We're interested in what young people think, so we've written some questions. You don't have to answer every one, but it would be really helpful if you let us know your thoughts.

Thank you for being a good global citizen and adding your voice to our consultation.



Global citizens take action in their community and work with others to make our planet more peaceful, sustainable and fairer.

.01

Write 3 things that you, or people you know, are doing to tackle climate change...

.02

What do you think governments need to do to tackle climate change?

.03

In general, do you think wind farms are a good idea?

☐ Yes

☐ No

☐ Unsure

.04

Do you have any concerns or worries about a wind farm being built near where you live?

.05

In terms of the Pen March Wind Farm, please tick one of the following boxes:

☐ I think it should be built

☐ I don't think it should be built

☐ I'm not sure what I think about it

.06

If Pen March Wind Farm goes ahead, there will be some money to help in the community. What could it be used for?

.07

What else would you like to see RWE doing in the area to benefit local young people?

Ffurflen adborth

Mae gennyn ni ddiddordeb yn yr hyn y mae pobl ifanc yn ei feddwl, felly rydyn ni wedi ysgrifennu ambell gwestiwn. Nid oes rhaid i chi ateb pob un, ond byddai'n ddefnyddiol iawn pe baech yn rhoi gwybod i ni am eich barn.

Diolch am fod yn ddinesydd byd-eang da ac am ychwanegu eich llais at ein ymgynghoriad.



Mae dinasyddion byd-eang yn gweithredu yn eu cymunedau ac yn gweithio gydag eraill i wneud ein planed yn fwy heddychlon, cynaliadwy a theg.

.01

Ysgrifennwch 3 pheth rydych chi, neu bobi rydych chi'n eu hadnabod, yn eu gwneud i fynd i'r afael â newid hinsawdd

.02

Beth ydych chi'n meddwl sydd angen i lywodraethau ei wneud i fynd i'r afael â newid hinsawdd?

.03

Yn gyffredinol, ydych chi'n meddwl bod ffermydd gwynt yn syniad da?

☐ Ydw

☐ Nac ydw

☐ Ansicr

.04

A oes gennych unrhyw bryderon am fferm wynt yn cael ei hadeiladu'n agos at eich cartref?

.05

O ran Fferm Wynt Pen March, ticwch un o'r blychau canlynol:

☐ Rwy'n meddwl y dylai gael ei hadeiladu

☐ Dydw i ddim yn meddwl y dylai gael ei hadeiladu

☐ Dydw i ddim yn siŵr beth yw fy marn am y peth

.06

Os bydd Fferm Wynt Pen March yn mynd yn ei blaen, bydd rhywfaint o arian ar gael i helpu'r gymuned. Ar gyfer beth allai'r arian gael ei ddefnyddio?

.07

Beth aroll hoffech chi weld RWE yn ei wneud yn yr ardal er budd pobl ifanc lleol?



Appendix J: Press release



Project update

Embargoed until Thursday 3 November 2022

Formal Public Consultation launched for 30MW Pen March Wind Farm

- RWE begins pre-application consultation on proposals to build a 30MW wind farm at Pen March near Merthyr Tydfil
- The developer is also discussing proposals for community ownership with two nearby local authorities
- The project could also deliver a package of support to community initiatives in the area

Baglan, 3 November 2022

RWE, Wales's largest electricity generator, is consulting on proposals to build a wind farm capable of generating power for 24,500 homes, above the A465 Heads of the Valleys road.

If approved, Pen March Wind Farm, to be located north-west of Rhymney and north-east of Merthyr Tydfil, will consist of up to six turbines with a capacity of around 30 MW and a maximum tip height of 180m, contributing to both Welsh and UK Government climate targets.

The pre-application consultation runs from 3rd November 2022 until 15th December 2022 online, with in-person events at Dowlais, Rhymney, and Idris Davies School.

RWE is also in discussions with Caerphilly and Merthyr Tydfil County Borough Councils on the potential for shared ownership on the project, an initiative which will support both authorities' decarbonisation efforts and address a key Welsh Government policy that 1 GW of generating capacity will be locally owned by 2030.

A reported 82 per cent of residents in the Merthyr Tydfil and Rhymney constituency support onshore wind.*

Jenny Cowley, RWE's Project Manager leading on the development, said: "Since 2019, we've been working hard developing the Pen March Wind Farm project.

"We've carried out assessments on site, held discussions with local stakeholders, conducted an informal public consultation and gathered a huge amount of valuable information.

RWE Renewables GmbH Corporate Communications & Public Affairs | RWE Platz 4 | 45141 Essen | Germany
[Redacted] | www.rwe.com/press



RWE

"We believe that this is an excellent site for a renewable energy project, which will help tackle climate change, secure energy supplies, and stabilise prices.

"We are now seeking formal input again from members of the public and statutory consultees, ahead of submitting a planning application to the Welsh Government."

As well as generating clean, green electricity at low cost, RWE will also put together a package of benefits that will directly benefit local people, including a community investment fund. In the last 10 years RWE in Wales has contributed over £10 million to local communities across Wales via its onshore and offshore wind funding.

The draft Environmental Statement, which can be found on the project's website, www.penmarch.co.uk, and will be available to view at the events, goes over the results of all the assessments and surveys as well as the how RWE plan to construct the wind farm as sensitively as possible.

RWE will consider consultation feedback and submit its planning applications early next year. The examination will take place during 2023, with a decision from Welsh Government expected in 2024. If the project gains planning consent, construction could take place in 2025, with the site being operational in 2026.

ENDS

Notes to Editors

The planning documents, including the draft Environmental Statement, Non-Technical Summary, and photomontages, can be found online at www.penmarch.co.uk

Consultation events are being held at:

- **Wednesday 16 November 3pm – 6pm** - Idris Davies School, Abertysswg Road, Abertysswg, Tredegar, NP22 5XF
- **Wednesday 23 Nov 2022 3pm - 7pm**, Ael y Bryn Sports & Community Centre, Aneurin Terrace, Rhymney, Tredegar, NP22 5DR
- **Saturday 26 Nov 10am - 2pm**, Dowlais Community Centre, Station Rd, Dowlais, Merthyr Tydfil CF48 3LP

As Pen March Wind Farm is located on Gelligaer and Merthyr Common, a separate application is also being made to the Welsh Government for permission to develop on common land.

About RWE

RWE produces around 15% of the UK's electricity and is the largest renewables investor in Wales, operating almost 1 GW of projects across onshore and offshore wind farms, hydro and gas energy generation across 12 sites.

The company employs over 300 people (plus many more jobs supported indirectly), with offices across the

RWE Renewables GmbH Group Corporate Communications & Public Affairs | RWE Platz 4 | 45141 Essen | Germany
[REDACTED] | www.rwe.com/press



RWE

country: in Baglan, Dolgarrog, Pembroke, and Port of Mostyn.

Pen March Wind Farm is one of a pipeline of new renewable energy projects in development across Wales in offshore, onshore, battery storage and hydrogen.

Over the last decade, together with partners, RWE has invested over £3 billion to deliver projects in Wales.

*Survation on behalf of RenewableUK conducted 27 July – 4 August 2022

For further enquiries:



Pictures for media use (credit: RWE)



RWE

RWE is leading the way to a green energy world. With an extensive investment and growth strategy, the company will expand its powerful, green generation capacity to 50 gigawatts internationally by 2030. RWE is investing €50 billion gross for this purpose in this decade. The portfolio is based on offshore and onshore wind, solar, hydrogen, batteries, biomass and gas.

RWE Supply & Trading provides tailored energy solutions for large customers. RWE has locations in the attractive markets of Europe, North America and the Asia-Pacific region. The company is responsibly phasing out nuclear energy and coal. Government-mandated phaseout roadmaps have been defined for both of these energy sources. RWE employs around 19,000 people worldwide and has a clear target: to get to net zero by 2040. On its way there, the company has set itself ambitious targets for all activities that cause greenhouse gas emissions. The Science Based Targets initiative has confirmed that these emission reduction targets are in line with the Paris Agreement. Very much in the spirit of the company's purpose: Our energy for a sustainable life.

UK General Data Protection Regulation (GDPR)

The personal data processed in connection with the press releases will be processed in compliance with the legal data protection requirements. If you are not interested in continuing to receive the press release, please inform us at communications@rwe.com. Your data will then be deleted and you will not receive any further press releases from us in this regard. If you have any questions about our data protection policy or the exercise of your rights under the GDPR, please contact ukdataprotectionrwe@rwe.com.

RWE Renewables GmbH Group Corporate Communications & Public Affairs | RWE Platz 4 | 45141 Essen | Germany

www.rwe.com/press



Appendix K: Poster

RWE

Pen March Wind Farm Pre-Application Consultation

Keeping you in the loop

RWE Renewables is holding a public consultation on Pen March Wind Farm from 3rd November to 15th December 2022.

The proposed Pen March Wind Farm site is north of the A465 Heads of the Valleys road, north-west of Rhymney and north-east of Merthyr Tydfil:

- Up to six turbines, with a potential generating capacity of around 30MW
- Support for local communities

Come along to one of the local drop-in exhibitions to:

- Meet the team and find out more
- Share your views and ask questions
- Learn more about local benefits and tackling climate change
- View computer generated models of the turbines

Wednesday 16 Nov 2022
3pm - 6pm
Idris Davies School
Abertysswg Road
Abertysswg, Tredegar
NP22 5XF

Wednesday 23 Nov 2022
3pm - 7pm
Ael y Bryn Sports & Community Centre
Aneurin Terrace
Rhymney, Tredegar
NP22 5DR

Saturday 26 Nov 2022
10am - 2pm
Dowlais Community Centre, Station Rd,
Dowlais, Merthyr Tydfil
CF48 3LP

The Non-Technical Summary of the draft Environmental Statement will be available to view at Dowlais Library and Rhymney Library.

For further information:
www.penmarch.co.uk
e: penmarch@rwe.com t: 01685 701354





RWE

Fferm Wynt Pen March Ymgynghoriad Cyn Ymgeisio

Y wybodaeth ddiweddaraf

Mae RWE Renewables yn cynnal ymgynghoriad cyhoeddus ar Fferm Wynt Pen March rhwng 3 Tachwedd a 15 Rhagfyr 2022.

Mae safle arfaethedig Fferm Wynt Pen March i'r gogledd o ffordd A465 Blaenau'r Cymoedd, i'r gogledd-orllewin o Rymni ac i'r gogledd-ddwyrain o Ferthyr Tudful:

- Hyd at chwech tyrbîn, gyda chapasiti cynhyrchu tua 30MW
- Cefnogaeth i gymunedau lleol

Galwch heibio un o'r arddangosfeydd cyhoeddus lleol i:

- Gwrdd â'r tim a darganfod mwy
- Rhannu eich barn a gofyn cwestiynau
- Dysgu mwy am fuddion lleol a mynd i'r afael â newid hinsawdd
- Gweld modelau cyfrifiadurol o'r tyrbînau



Dydd Mercher 16 Tach 2022
3yp - 7yh
Ysgol Idris Davies
Heol Abertyswg
Abertyswg, Tredegar
NP22 5XF



Dydd Mercher 23 Tach 2022
3yp - 6yh
Canolfan Chwaraeon a Chymunedol
Ael y Bryn
Teras Aneurin
Rhymni, Tredegar
NP22 5DR



Dydd Sadwrn 26 Tach 2022
10yb - 2yp
Canolfan Gymunedol Dowlais
Heol yr Orsaf
Dowlais, Merthyr Tudful
CF48 3LP

Bydd y Crynodeb Annhechnegol o'r Datganiad Amgylcheddol drafft ar gael i'w weld yn Llyfrgell Dowlais a Llyfrgell Rhymni.



Am ragor o wybodaeth:

www.penmarch.co.uk

e: penmarch@rwe.com ff: 01685 701354



Appendix L: Website and virtual exhibition

[Downloads](#)
[Online Exhibition](#)

Take a look around our online exhibition

Pen March Wind Farm

We ran a statutory consultation on our plans for Pen March Wind Farm from 3rd November 2022 to 15th December 2022. The consultation has now closed.

We would like to thank everyone who attended the public events and took the time to provide feedback on our plans.

We are currently reviewing all of the feedback we've received from members of the public and from statutory consultees.

During 2023 we will then finalise our planning application and submit it to Planning and Environment Decisions Wales (PEDW).

If you have any questions or feedback, the Pen March project team can still be contacted on 01685 701355 or penmarch@rwe.com.

You can view information about the project here:

- View information about the project, watch the project manager's video and view maps and photomontages in the [online exhibition](#)
- Read the draft Environmental Statement, Non-Technical Summary and all associated documentation in the [Planning Documents](#)

Planning Documents

Technical documents, maps & plans

About RWE UK

RWE in Wales

RWE Careers Portal

Register your interest as a supplier

Planning Documents

Draft consultation forms

Site plan

Other plans, reports and information

Statutory Notice

Design's land use assessment

Draft Environmental Statement, Non-Technical Summary and photomontages

Secondary Content

[Penmarch Planning](#)

[01685 701355](#)
[penmarch@rwe.com](#)





Appendix N: Feedback form

About You

How old are you?

☐ Under 20
☐ 20-35
☐ 35-50
☐ 50-65
☐ 65+
☐ Prefer not to say

Which best describes you?

☐ I live in the area
☐ I work in the area
☐ Other (please specify)

Are you responding on behalf of an organisation?

☐ No
☐ Yes (please state which organisation)

So we can check we are reaching the right people, please provide the first half of your postcode

How did you hear about the consultation? (please tick all that apply)

☐ Information booklet sent to my home
☐ Social media
☐ Poster
☐ Word of mouth
☐ Newspaper (Merthyr Express)
☐ Site notice
☐ Newspaper (Caerphilly Observer)
☐ Other (please describe)
☐ Other newspaper

If you would like to be kept updated on the plans for Pen March Wind Farm, please provide your name and email address below. These details will only be used to provide you with information in relation to Pen March Wind Farm.

Please let us know any other comments you have on the proposals.



RWE

Pen March Wind Farm

Feedback form

Thank you for providing your feedback on Pen March Wind Farm

For further information:
www.penmarch.co.uk penmarch@rwe.com 01685 701354

For further information:
www.penmarch.co.uk penmarch@rwe.com 01685 701354

Feedback form

ODPR Your contact information will only be used to provide you with updates on RWE Renewable's Pen March Wind Farm. RWE Renewable will share the information you provide with Cadno Communications who will send information to you on behalf of RWE Renewable. RWE Renewable and Cadno Communications will not pass your information onto any third parties. If you wish to be removed from the list at any time please contact arad@cadnocomms.co.uk. This is a statutory consultation. All comments will be reviewed and considered by RWE. Your comments may be published in the consultation report. All comments will be anonymised and care will be taken to ensure individuals cannot be identified.

The Project

Are you supportive of the Pen March Wind Farm proposal?

☐ Yes ☐ No ☐ Unsure

Please outline what you think the benefits might be and what concerns you have, if any.

Benefits	Concerns

Do you think there is anything else we should be considering as we develop our plans? Things that might benefit the local area, or issues you think we haven't considered yet?

Climate Change

"I recognise that there is a climate emergency that needs addressing"

☐ Agree ☐ Disagree ☐ Unsure

Do you support the development of onshore wind farms?

☐ Yes ☐ No ☐ Unsure

Shared Ownership

RWE Renewable is discussing shared ownership with Caerphilly Council and Merthyr Tydfil County Borough Council in relation to the Pen March project so that local communities get a direct stake in the project. Do you think that's a good idea?

☐ Yes ☐ No ☐ Unsure

Do you have any further comments about shared ownership?

About the Consultation

Which of the materials have you used?

☐ Information booklet
☐ Website
☐ Virtual exhibition
☐ Attended exhibition at Idria Davies School

Attended exhibition at Ael y Bryn Sports & Community Centre
 Attended exhibition at Dawlisd Community Centre
 Viewed materials in the library

Other (please specify)

How useful did you find the information?

☐ Very useful ☐ Quite useful ☐ Neutral ☐ Not very useful ☐ Not at all useful

Do you have any thoughts on how we could have made the information more useful?



Amdanoch Chi

Faint yw eich oedran?

☐ O dan 20
☐ 20-35
☐ 35-50
☐ 50-65
☐ 65+

Mae'n well gen i beldio â dweud

Pa un o'r rhain sy'n eich disgrifio orau?

☐ Rwy'n bywr yn yr ardal
☐ Rwy'n gweithio yn yr ardal
☐ Arall (nodwch)

Are you responding on behalf of an organisation?

☐ Nac ydw
☐ Ydw (nodwch pa sefydliad)

Er mwyn i ni allu gwirio eiddad yn cyrraedd y bobl iawn, nodwch bennaf cyntaf eiddad cod post, os gwelwch yn dda

Sut wnaethoch chi gilydd am yr ymgynghoriad? (ticiech bob un sy'n berthnasol)

☐ Llyfrn gwybodaeth a anfonwyd i'm cartref
☐ Papur newydd arall
☐ Poster
☐ Cyfngau cymdeithasol
☐ Papur newydd (Martyr Express)
☐ Ar lafar gwlad
☐ Papur newydd (Coerphilly Observer)
☐ Hysbysiad safle
☐ Papur newydd arall

Os hoffech gael y wybodaeth ddwyddarof am y cynlluniau ar gyfer Fferm Wynt Pen March, rhwch elch anw o'ch cyfeiriad e-bost iodd. Bydd y manylion hyn yn cael eu defnyddio i roi gwybodaeth i chi am Fferm Wynt Pen March.

Rhwch wybod i ni os oes gennych sylwadau eraill am y cynllun.

RWE

Fferm Wynt Pen March

Ffurflen Adborth

Diolch am roi eich adborth am Fferm Wynt Pen March

Am ragor o wybodaeth:
www.penmarch.co.uk penmarch@rwe.com 01685 701354

Am ragor o wybodaeth:
www.penmarch.co.uk penmarch@rwe.com 01685 701354

Ffurflen Adborth

GDPR: Dim ond i ni'n wybodaeth ddwyddarof i chi am Fferm Wynt Pen March RWE Renewables y bydd eidd gwybodaeth gysyllt yn cael ei defnyddio. Bydd RWE Renewables yn rhannu'r wybodaeth a roddwch gyda Cadno Communications a fydd yn anfon gwybodaeth atoch ar ran RWE Renewables. Ni fydd RWE Renewables o Cadno Communications yn trosglwyddo eidd gwybodaeth i unrhyw ardydd parti. Os dymunwch gael eidd tynnu oddi ar y rhestr unrhyw bryd cyffwrdd â cadno@cadnocomms.co.uk.

Mae hwn yn ymgynghoriad statudol. Bydd yr holl sylwadau'n cael eu trosglwyddo i'n hysbysu i RWE.

Mae'n iodd i chi eidd sylwadau eu cyhoeddi yn yr adroddiad ymgynghoriad. Bydd yr holl sylwadau yn ddiennw a chymerf gefal i eiddad na eidd adnabod unigellon.

Newid Hinsawdd

"Rwy'n cydnabod bod yna orgyfngwng hinsawdd sydd angen myni i'r afael ag ei"

☐ Cyfuno ☐ Anghyfuno ☐ Ansicr

Ydych chi'n deffnagi ddblygu ffermydd gwynt ar y tîr?

☐ Ydw ☐ Nac ydw ☐ Ansicr

Rhanberchogaeth

Mae RWE Renewables yn trafod rhanberchogaeth ar brosiect Pen March gddo chynghorau Caeffili a Martyr Tuffel fel bod cymunedau ffol yn cael rhan unibngynghol yn y prosiect. Ydych chi'n meddwl bod hynny'n symlad da?

☐ Ydw ☐ Nac ydw ☐ Ansicr

A os gennych ragor y sylwadau am rhanberchogaeth?

Y Prosiect

A ydych yn cafnagi cynnig Fferm Wynt Pen March?

☐ Ydw ☐ Nac ydw ☐ Ansicr

Amfellech yr hyn rydych chi'n meddwl fyddai'r moniteision, ac unrhyw bryderon sydd gennych, os e gwbl.

Moniteision Pryderon

A ydych yn meddwl bod unrhyw beth arall y dylem ei ystyried wrth i'ni ddblygu eidd cynlluniau? Pethau o allod fod o fudd i'r ardal leol, neu faterion eraill ydyd wedi'u hystyried eidd yn eidd barn chi?

Ynglŷn â'r Ymgynghoriad

Pa roi o'r deunyddiau ydych chi wedi eu defnyddio?

☐ Llyfrn gwybodaeth ☐ Mynychu arddangosfa yng Nghenalltan Chwaraeon a Chymunedol Ael y Bryn ☐ Arall (nodwch)
☐ Gwefan ☐ Mynychu arddangosfa yng Nghenalltan Gymunedol Ddwale
☐ Arddangosfa rhywiwr ☐ Wedi edgrych ar ddeunyddiau yn y llyfrgell
☐ Mynychu arddangosfa yn Ysgol Idria Davies

Pa mor ddefnyddiol oedd y wybodaeth i chi?

☐ Defnyddiol iawn ☐ Eiddad defnyddiol ☐ Niwtral ☐ Ddim yn ddefnyddiol iawn ☐ Ddim yn ddefnyddiol o gwbl

A os gennych syniadau ynghylch sut y gallwch fod wedi gwneud y wybodaeth yn fwy defnyddiol?



APPENDIX G

COPIES OF NOTICES GIVEN TO COMMUNITY
CONSULTEES, SPECIALIST CONSULTEES, AND
RELEVANT PERSONS IN ACCORDANCE WITH
ARTICLES 9(2) AND 9(3)



Community Consultees and Relevant Persons (Schedule 1 Notice)

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

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

NOTICE UNDER ARTICLE 8 AND 9(2)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed Development of National Significance (DNS) prior to the submission of a planning application to the Welsh Ministers. Planning applications for DNS will be publicised by the Welsh Ministers and the relevant local planning authority; any comments provided in response to this notice will not prejudice your ability to make representations to the Welsh Ministers on any related DNS planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at **Pen March Wind Farm at Gelligaer and Merthyr Common**

I give notice that RWE Renewables UK Swindon Ltd is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is the **construction and operation of a wind farm, battery energy storage systems and associated infrastructure** and considers that the following secondary consents are connected to the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers:

Consent under Section 16 of the Commons Act 2006 to deregister and exchange common land

Consent under Section 38 of the Commons Act 2006 to carry out restricted works on common land to lay, maintain, replace and remove an underground electricity cable

You may inspect copies of the proposed application; the plans; and other supporting documents online at <https://penmarch.co.uk/>.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at penmarch@rwe.com or **RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX** by 15th December 2022.

Signed:



Date: 3rd November 2022



Specialist Consultees (Schedule 2 Notice)

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

**CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION – NOTICE UNDER
ARTICLE 9(3)**

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 9(3) of the Developments of National Significance (Procedure) (Wales) Order 2016.

Proposed development at **Pen March Wind Farm at Gelligaer and Merthyr Common**

I give notice that RWE Renewables UK Ltd is intending to apply to the Welsh Ministers for planning permission in respect of Development of National Significance which is **the construction and operation of a wind farm, battery energy storage systems and associated infrastructure** and consider the following secondary consents are connected with the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers

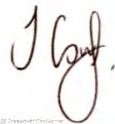
Consent under Section 16 of the Commons Act 2006 to deregister and exchange common land

Consent under Section 38 of the Commons Act 2006 to carry out restricted works on common land to lay, maintain, replace and remove an underground electricity power cable

A copy of the proposed application; plans; and other supporting documents can be viewed online at **<https://penmarch.co.uk>**

In accordance with the requirements of article 10 of the Developments of National Significance (Procedure) (Wales) Order 2016, a consultation response must be sent to **penmarch@rwe.com** or RWE Renewables UK Swindon Limited, Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX by **Thursday 15th December 2022**.

Signed:



Date: 3rd November 2022

APPENDIX H

COPIES OF ALL RESPONSES RECEIVED FROM
COMMUNITY CONSULTTEES, SPECIALIST
CONSULTEES, RELEVANT PERSONS, AND OTHER
INTERESTED PARTIES

Community Consultees

- Rhymney Community Council (CC1)
- Councillors Declan Sammon, Paula Layton, and David Hughes (CC2)
- Llangynidr Community Council (CC3)
- Councillor Jackie Charlton (CC4)

[REDACTED]

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: [EXT] Pen March Wind Farm - Pre-application Consultation

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: rhymneycommunitycouncil <rhymneycommunitycouncil@btinternet.com>
Sent: 12 December 2022 20:18
To: Pen March Project <penmarch@rwe.com>
Subject: [EXT] Pen March Wind Farm - Pre-application Consultation

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

To whom it may concern,

I write on behalf of Rhymney Community Council, and to offer the collective view of Council, as part of this pre-application consultation.

Council is grateful for the numerous touch-point consultations conducted by RWE and CADNO over the last two years. Dialogue which has offered Council / Councillors both advance sight, and a more detailed appreciation of the proposal, as it shaped.

In summary, Council is supportive of the development, acknowledging the need to embrace renewable technologies in generating future energy. Council is also content with the proposal for common land transfer, and does not anticipate this to cause undue issue for users of the common.

Council is however cognisant of a number of factors highlighted by local residents. Whilst Council understands the following will be addressed as part of normal planning diligence, Council wished to highlight the following for design consideration only:

- the aesthetic impact of a collective number of turbines, mindful of turbines already in situ at Dowlais Top, Pen Bryn Oer, and Tafarnau Bach, Tredegar;

- the shadowing impact of flicker, against the backdrop of a setting sun, casting across North Rhymney;
- the historical impact. A small number of local residents have highlighted the area as of historical significance. Council is unable to confirm or corroborate this suggestion, although wishes RWE to take necessary steps to investigate further; and
- the ecological impact. Again a small number of local residents have highlighted the potential for a negative impact on nesting Curlew in the area.

I trust this narrative highlights Council's positive response to the above-mentioned proposal. Should you require any further information, please do not hesitate to get in contact.

Kind regards,

Geraint
Geraint Williams
Clerk and RFO, Rhymney Community Council
[REDACTED]
Email. rhymneycommunitycouncil@btinternet.com
Web. rhymneycommunitycouncil.org.uk

COUNCILLOR/CYNGHORYDD DECLAN SAMMON
15 MARKET STREET, DOWLAI, MERTHYR TYDFIL CF48 3HL

Canolfan Ddinesig, Stryd y Castell,
Merthyr Tudful, CF47 8AN

Civic Centre, Castle Street,
Merthyr Tydfil, CF47 8AN

Ffôn / Tel: (01685) 725000
Ffacs / Fax: (01685) 374397
www.merthyr.gov.uk



Cyngor Bwrdeistref Sirol
MERTHYR TYDFIL
MERTHYR TYDFIL
County Borough Council

Dyddiad/Date: 15th December 2022

Ein Cyf./Our ref.:
Eich Cyf./Your ref.:

Gofynnwch am / Please ask for:
Llinell Uniongyrchol / Direct Line:
e-bost / e-mail:

Councillor Declan Sammon
07508 604948
declan.sammon@merthyr.gov.uk

Feedback following Public Meeting

Hello Sarah,

Following public consultation with residents of the Dowlais and Pant Ward regarding the proposed Pen March Wind Farm, I have listed below some of the concerns raised by residents.

I have also sent the below concerns through the online pre-application consultation page.

1. Merthyr Tydfil is the gateway to the Brecon Beacons National Park, and if this application to build up to six wind turbines on unspoilt ancient upper moorland is passed, it would have a serious impact on any future tourism plans for Merthyr Tydfil.
2. This application is not in one of the already Pre-Assessed Areas for Wind Energy as designated by Future Wales: the national plan 2040.
3. The proposed wind turbines will not lower the energy costs of local residents.
4. The blades of wind turbines are non-recyclable.

Merthyr Tudful
... lle I fod yn falch ohono

Merthyr Tydfil
... a place to be proud of

5. The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty for public authorities in the exercise of functions in relation to Wales. The duty requires that public authorities 'must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems'.

It is noted in the report compiled by RSK Environment Limited, that with the proposed application, the unavoidable loss of Site Of Importance for Nature Conservation designated habitats is assessed as being significant at the 'county' level.

The proposed scheme would result in the loss of 10.12 hectares of suitable reptile habitat.

Six species of bat have been noted at this site which is used for foraging and commuting.

Given that Welsh Government introduced the Environment Act 2016 to promote the resilience of ecosystems, it is felt that this proposed development is not beneficial in maintaining or enhancing our biodiversity.

6. Residents are worried about the affect 'flicker' could have on them and their families, and the long-term effects this could have on both their mental and physical wellbeing.

Yours sincerely,

COUNCILLOR DECLAN SAMMON
MAYOR OF MERTHYR TYDFIL 2022/23



ON BEHALF OF:

COUNCILLOR PAULA LAYTON
COUNCILLOR DAVID HUGHES

[REDACTED]

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: [EXT] Statutory Consultee Response from a meeting held 14th December 2022.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Sue Dale <sedale@btinternet.com>
Sent: 15 December 2022 11:51
To: Pen March Project <penmarch@rwe.com>
Subject: [EXT] Statutory Consultee Response from a meeting held 14th December 2022.

****EXTERNAL EMAIL**:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments

Dear RWE,

Please acknowledge receipt.

Llangynidr Community Council approve the application to build 6 wind turbines and associated tracks, partly in its ward.

It also wanted to make the its case for community benefits; we are a small rural community with aspirations led by good community support. The village hall wants to build a new track around the recreation ground to allow everyone to partake in worry-free exercise. Other projects include rejuvenating the play ground, building a toilet and shower block, creating a biodiversity 'ribbon' around the field, renewable energy for the hall and other projects further down the pipeline. We would gladly acknowledge any assistance given.

Regards, Sue Dale
Clerk

From: [Councillor Jackie Charlton](#)
To: [REDACTED]
Subject: RE: REMINDER: Pen March Wind Farm - Pre-application Consultation ends 15th December 2022
Date: 02 January 2023 11:05:33

Hi [REDACTED]

I didn't manage to respond to the consultation but after talking to Llangynidr Community Council and being in attendance when the presentation was given to them there was little to respond with.

No doubt there will be further information going forward.

I'm not sure how much more engagement will be undertaken but I feel fairly confident that the main issues for me are around land management on site, community gain and whether the relevant policies in relation to environmental issues have been taken in to account.

My main concern, and this remains with all development in and around Wales, is protection of peat and peat bogs in relation to siting of turbines on site.

Many thanks for engaging in a meaningful way.

Kind regards
Cllr Jackie Charlton

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

Specialist Consultees

- Welsh Ministers (as Highways Authority for Trunk Roads) (SC1)
- Caerphilly County Borough Council Highways Team (SC2)
- Cadw (on behalf of Welsh Ministers) (SC3)
- Natural Resources Wales (SC4)

Daniel Patterson

From: Thomas, Rhodri <Rhodri.Thomas@wsp.com>
Sent: 24 November 2022 10:53
To: Pen March Project
Cc: Jones, Richard (EST - Transport); LGC_Development_Control-South@gov.wales
Subject: [EXT] FW: Pre Planning - Pen March Wind Farm at Gelligaer and Merthyr Common
Attachments: PAG for windfarms.pdf

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Good Morning Pen March consultation team,

On behalf of the Welsh Government.

Pre Planning - Pen March Wind Farm at Gelligaer and Merthyr Common
Pen March Wind Farm at Gelligaer and Merthyr Common

Detail needs to be provided to prove access for transporting AILs is achievable from the point of entry to the Welsh trunk road network to the site, that minimises any impact on the safety and free flow of trunk road traffic. Please supply swept paths of the worst case AILs at all potential horizontal and vertical constraints along the access route as well as the likely traveling weights and dimensions of AILs.

Attached for reference, is the draft version of our “Pulling Together” – Best Practice for Transporting Abnormal Loads in Wales - Procedures and Advice Guidance (PAG) document.

For your information please find below our standard planning conditions;

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

ALLs 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.

Regards

Rhodri

Rhodri Thomas BSc. (Hons) GMICE

Senior Engineer

I am now on secondment, and will have intermittent access to emails.



T+44 (0) 29 20 769 275

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Cardiff
CF10 4BZ

wsp.com

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Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in

Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Daniel Patterson

From: Hobbs, Jacquie <HOBBSJ1@CAERPHILLY.GOV.UK>
Sent: 05 December 2022 10:24
To: Pen March Project
Subject: [EXT] Proposed development at Pen March Wind Farm (PEDW Ref No: DNS/3253147)

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

To whom it may concern,

Having reviewed the online documents . the Planning statement states that there is a Transport Assessment, however, this could not be found.

I trust the above is helpful but would confirm that the advice given is offered on an informal basis having regard to the information that is at hand at the present time and is wholly without prejudice to the formal consideration given on any planning application submitted for planning permission on the site.

Kind regards

Jacquie

Jacquie Hobbs

Prif Beriannydd | Principal Engineer Cyngor Bwrdeistref Sirol Caerffili | Caerphilly County Borough Council
HOBBSJ1@caerphilly.gov.uk / HOBBSJ1@caerffili.gov.uk
www.caerffili.gov.uk | www.caerphilly.gov.uk

Gallwch ohebu mewn unrhyw iaith neu fformat.Ni fydd gohebu yn Gymraeg yn creu unrhyw oedi.
Correspondence may be in any language or format.Corresponding in Welsh will not lead to any delay.

Mae'r e-bost hwn ac unrhyw ffeiliau sy'n atodol yn gyfrinachol a dim ond ar gyfer defnydd yr unigolyn neu'r sefydliad y cyfeiriwyd atynt. Os ydych wedi derbyn yr e-bost hwn ar gam rhwch wybod i reolwr eich system. Nodwch fod unrhyw sylwadau neu farn o fewn testun yr e-bost yw sylwadau a barn yr awdur yn unig ac nid yn angenrheidiol yn cynrychioli barn Cyngor Bwrdeistref Sirol Caerffili. I orffen, dylai'r person sy'n derbyn yr e-bost sicrhau nad oes firws ynghlwm nac mewn unrhyw ddogfen atodol i'r e-bost. Nid yw'r Cyngor yn derbyn unrhyw gyfrifoldeb am unrhyw ddifrod achoswyd gan unrhyw firws sy'n cael ei drosglwyddo gan yr e-bost hwn. Rydym yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog (yn unol â'ch dewis), ac mewn ieithoedd a fformatau eraill. Cewch ymateb yn unol â'ch dewis iaith os nodwch hynny i ni, ac ni fydd cyfathrebu â ni yn Gymraeg yn arwain at oedi. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of Caerphilly County Borough Council. Finally, the recipient should check this email and any attachments for the presence of viruses. The Council accepts no liability for any damage caused by any virus transmitted by this email. We welcome correspondence in English, Welsh or bilingually (according to your choice) or in other languages and formats. We will respond in your declared chosen

language, and corresponding with us in Welsh will not lead to any delay.

#####

Jenny Cowley
RWE Renewables UK Swindon Limited, Baglan
Bay Innovation Centre,
Central Avenue,
Baglan Energy Park,
Port Talbot,
SA12 7AX

penmarch@rwe.com

Eich cyfeirnod
Your reference

DNS/3253147

Ein cyfeirnod
Our reference

Dyddiad
Date

7 December 2022

Llinell uniongyrchol
Direct line

0300 0250566

Ebost
Email:

cadwplanning@gov.wales

Dear Jenny

Pre-Planning Application - Pen March Windfarm, Gelligaer & Merthyr Common

Thank you for your letter of 3 November inviting our comments on the pre-planning application consultation for the proposed development described above.

Advice

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

Cadw have no objection to the above proposal.

The national policy and Cadw's role in the planning process is set out in Annex A.

Historic assets within a 5km developer ZTV to blade tip are listed in Annex B.

Assessment

The application will be submitted along with an environmental statement prepared by RWE Renewables UK with specialist advice on the historic environment provide by HCUK. This work has followed appropriate methodologies to consider the direct impact of the proposed development on the known and suspected archaeological resource, along with the impact of the proposed development on the settings of the designated historic assets identified above and the registered Merthyr Tydfil landscape of outstanding historic interest. It has concluded that whilst there will be adverse impacts on the settings of some designated historic assets and the registered historic landscape, none of these impacts will be significant. We concur with this conclusion.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise



that you consult the Historic Environment Record held by the Glamorgan-Gwent Archaeological Trust www.ggat.org.uk.

Yours sincerely,

Jenna Arnold
Policy and Protection

Annex A

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

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

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.



Annex B

Scheduled Monuments:

BR118 Cae Burdydd Castle
BR123 Y Gaer, Dol-y-Gaer
BR141 Ponsticill Inscribed Stone
BR145 Nant Crew Inscribed Stone (now in Cefn Coed Church)
BR254 Cwm Criban Prehistoric Settlement
BR277 Carn y Bugail and Carn Felen
BR278 Waun y Gwair Cairn
BR279 Nant Morlais Hafod
BR286 Buarth y Caerau Cairn
BR322 Garn Fawr round cairn
BR362 Pontsticill platform cairn
BR389 Twyn Ceilog Round Cairn
GM028 Morlais Castle
GM220 Gelligaer Common Round Cairns
GM222 Merthyr Common Round Cairns
GM331 Ynys Fach Iron Furnaces
GM403 Rhymney Upper Furnace
GM425 Remains of Blast Furnaces, Cyfarthfa Ironworks
GM467 Cyfarthfa Canal Level
GM478 Gurnos Quarry Tramroad & Leat
GM479 Tai Mawr Leat for Cyfarthfa Iron Works
GM486 Iron Canal Bridge from Rhydycar
GM494 Sarn Howell Pond and Watercourses
GM496 Deserted Iron Mining Village, Ffos-y-fran
GM518 Enclosure East of Nant Cwm Moel
GM563 Morlais Hill ring cairn
GM569 Garn Pontsticill ring cairn
GM570 Carn Ddu platform cairn
GM573 Merthyr Tramroad Tunnel (Trevithick's Tunnel)
GM594 Merthyr Tramroad: Morlais Castle section
GM599 Cefn Cil-sanws, cairn on SW side of
GM600 Cefn Cil-sanws defended enclosure
GM611 Cwm Glo pit and ironstone tip
GM623 Pitwellt Pond, Prehistoric Hut Circle Settlement (proposed scheduling)
GM624 Rhaslas Pond South Dam
MM185 Sirhowy Ironworks, Site of
MM287 Tredegar Ironworks Cholera Cemetery
MM338 Trefil Quarries North
MM339 Trefil Tramroad
MM344 Twyn Bryn March round cairn
MM347 Afon Sirhowy hut circle

Registered Parks and Gardens:

PGW(Gm)1(MER) Cyfarthfa Castle
PGW(Gm)70(MER) Cefn Coed Cemetery & Jewish Burial Ground



Registered Historic Landscape:

HLW (MGL) 2 Merthyr Tydfil

Listed Buildings:

11377 Cefn Railway Viaduct	II*	
11382 Cefn Railway Viaduct	II*	
11384 Tower of Old Church of St Gwynno	II	
11387 Christ Church	II	
11388 Jackson's Bridge	II	
11389 Vulcan House including attached rear range, and forecourt wall and gate	II	
11393 Our Lady of the Rosary Roman Catholic Church	II	
11394 Capel Tabernacl (Welsh Baptist Church)	II	
11395 Church Hall at Capel Tabernacl	II	
11424 NOS.9,9A & 9B DYNEVOR STREET,GEORGETOWN,,,,,MID GLAMORGAN,	II	
11430 Springfield Villa	II	
11436 Crown Inn	II	
11437 Barclay's Bank	II	
11438 Lloyds Bank	II	
11439 St David's Church	II	
11440 Church Hall at St David's Church	II	
11441 Memorial Fountain in St David's Chuchyard Wall	II	
11442 Carnegie Library	II	
11443 Statue & Plinth to Henry Seymour Berry	II	
11444 Town Hall	II*	
11445 Former County Court	II	
11446 Pillar Box at NE corner of Town Hall	II	
11447 Flook	II	
11449 St Tydfil's Church	II	
11450 Gates & Railings at St Tydfil's Churchyard	II	
11451 High Street Baptist Church	II	
11452 Zoar Chapel (Welsh Congregational)	II	
11453 Gates & Gatepiers at Entry to Zoar Chapel	II	
11454 Former Wesley Methodist Church	II	
11455 Merthyr Tydfil War Memorial	II	
11456 Guard Rail & Steps at Merthyr Tydfil War Memorial	II	
11458 NO.13 NEW CASTLE STREET,,,,,MID GLAMORGAN,	II	
11459 NO.13A NEW CASTLE STREET,,,,,MID GLAMORGAN,	II	
11460 NO.14 NEW CASTLE STREET,,,,,MID GLAMORGAN,	II	
11461 Trengrove House	II	
11462 NO.16 NEW CASTLE STREET,,,,,MID GLAMORGAN,	II	
11463 NO.17 NEW CASTLE STREET,,,,,MID GLAMORGAN,	II	
11464 Theatre Royal	II	
11465 Thespian House at Theatre Royal	II	
11468 District Education Office of Mid-Glamorgan County Council	II	
11469 Boer War Memorial & Railings	II	
11473 Newton House	II	
11474 Newton House	II	



- 11475 St Tydfil's Hospital: Entrance Block (Centre Part Only) II
 11476 Statue & Plinth to Sir W.T. Lewis II
 11477 Stables House II
 11478 Dowlais Works Stables II
 11481 NOS.11 & 12 NEW CASTLE STREET,,,,,MID GLAMORGAN, II
 11487 Gwaelodygarth House II
 11488 NOS.1-16 (CONSEC) UPPER COLLIERS ROW,,,,,MID GLAMORGAN, II
 11489 Ivor English Congregational Church including forecourt walls II
 11490 Former Guest Memorial Library II*
 11491 Dowlais Works Blast Engine House II*
 11512 Hen Dy Cwrdd Unitarian Chapel II
 11516 NOS.15-21 (CONSEC) SWANSEA ROAD,GELLIDEG,,,,,MID GLAMORGAN, II
 13546 Nos 1-14 (consec) Collins Row II
 13547 Nos 14-28 (consec) Lower Row II
 13548 Nos 1-13 (consec) Middle Row & attached Windsor Arms PHII
 13549 Rhymney House Hotel II
 13554 St David's (Masonic Hall) and attached NE and SW garden walls II
 13555 No.2 The Terrace and attached garden wall with gate piers II
 13556 House and attached garden wall II
 13578 Church of St David II*
 13587 1-4 Susannah Houses (consec) II
 13588 Railway Viaduct II
 15676 Rhydycar Skew Bridge II
 15677 Rhydycar Canal Bridge II
 16073 Ynysfach Engine House II*
 16143 Timber Aqueduct over Former Taff Bargoed Railway II
 16882 Old Furnace Farmhouse II
 17931 Church of St John II
 21159 Pont Sticill (also known as Pontsticill Bridge) II
 21210 Barn and byre range at Coed Hir II
 21214 Brecon and Merthyr Railway bridge beside Ponsticill Reservoir II
 21314 Bethania Independent Chapel II
 21317 Tabor Independent ChapelII
 21430 Penuel Baptist Church II*
 21431 Ebenezer Calvinistic Methodist Chapel including vestry II
 22494 Milgatw II*
 22495 Agricultural Range at Milgatw II
 22496 Sirhowy Ironworks II*
 22497 Former Tramroad Bridge over Sirhowy River II
 22498 Ironworks Boundary Stone II
 25179 Church of St Tyfaelog II
 25180 War Memorial II
 25181 Boundary Wall and Railings at St David's Churchyard II
 25182 Former Pay Office Noddfa Buildings II
 25183 Nos 1 and 2 The Lawn II
 25184 The VicarageII
 25185 Ysgol Lawnt II
 25186 No.3 The Terrace and attached garden wall with gate piers II



25187 No.4 The Terrace and attached garden wall with gate piers	II
25188 No.5 The Terrace and attached garden wall with gate piers	II
25189 No.6 The Terrace and attached garden wall with gate piers	II
25190 No.7 The Terrace and attached garden wall with gate piers	II
25191 No.8 The Terrace and attached garden wall with gate piers	II
27083 Dowlais Public Library	II
27084 Mile Post	II
27085 Lower Row	II
27086 Industrial building at former Ivor Works	II
80765 No 10 Upper Colliers Row,,,,,,	II
80766 No 13 Upper Colliers Row,,,,,,	II
80767 No 14 Upper Colliers Row,,,,,,	II
80768 No 16 Gelli-deg,,,,,,	II
80769 No 17 Gelli-deg,,,,,,	II
80770 NO 19 Gelli-deg,,,,,,	II
80771 NO 21 Gelli-deg,,,,,,	II
80772 No 9 Upper Colliers Row,,,,,,CF48 1UN	II
80773 Nos 11-12 Upper Colliers Row,,,,,,	II
80774 Nos 15-16 Upper Colliers Row,,,,,,	II
80775 Nos 3-4 Upper Colliers Row,,,,,,	II
80776 Nos 5-6 Upper Colliers Row,,,,,,	II
80777 Nos 7-8 Upper Colliers Row,,,,,,	II
80958 The War Memorial, screen walls and surrounding railings	II
80959 Blaenygarth	II
80961 Centre ventilation shaft to Morlais Tunnel	II
80962 SE Ventilation Shaft to Morlais Tunnel	II
80963 White Gate Road Bridge and Aqueduct	II
80964 Aqueduct on Dowlais Free Drainage System	II
81185 Church of St John the Baptist	II
81187 Direction post near Church of St Gwynno	II
81188 Gravestone of Robert Thompson Crawshay and surrounding railings	II
81189 Hy Brasail	II
81197 Road bridge near former Pontsarn Station	II
81199 Dam, valve tower, bridge and outflow on Pontsticill Reservoir	II
82671 Former Miner's Welfare Hall	II
87475 ,12,New Castle Street ,,,,	II
87476 ,18,New Castle Street,,,,	II
87477 ,19,New Castle Street,,,,	II
87478 ,20,New Castle Street,,,,	II
87479 Former Chapel	II
87660 115 High Street	II



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-202537-L2Q4
Eich cyf/Your ref:

Rivers House,
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RWE Renewables UK Swindon Ltd.
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Port Talbot
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ebost/email:
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21/12/2022

Annwyl Syr/Madam / Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

BWRIAD / PROPOSAL: THE CONSTRUCTION AND OPERATION OF A WIND FARM, BATTERY ENERGY STORAGE SYSTEMS AND ASSOCIATED INFRASTRUCTURE.

LLEOLIAD / LOCATION: PEN MARCH WIND FARM AT GELLIGAER AND MERTHYR COMMON.

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 03/11/2022.

We understand the proposed development is for up to six 6MW wind turbines (180m to blade tip) with aviation lighting and ancillary infrastructure (e.g. access roads, battery storage, cabling etc.), with grid connection likely at the Dowlais Bulk Supply Point substation, approximately 500m south-west of the site.

Based on the information submitted, we would object if a planning application was made in the same or substantially the same terms for the reasons explained below.

Landscape and Visual Amenity

Our advice on landscape and visual amenity relates to the potential impacts on the Brecon Beacons National Park (BBNP).

We consider the proposal would result in significant adverse effects on the BBNP and conflicts with the statutory purpose to conserve and enhance natural beauty, as set out in Planning Policy Wales, Edition 11. The proposal does not lie within a Pre-assessed Area for Wind Energy as defined in the National Development Framework, Future Wales: The National Plan 2040, and lies within the immediate setting of the BBNP.

In our response to the EIA Scoping consultation, our letter reference CAS-115523-M7J0, dated 03/07/2020, we advised 'We anticipate at this location, a proposal of this scale and nature would result in significant adverse effects on the National Park and we do not believe that it could comply with policy...However, progression of the proposal is a matter for the Applicants' consideration...'

Our EIA Scoping advice has been included within the Landscape and Visual Impact Assessment (LVIA) by Optimised Environments Limited (OPEN), contained within Chapter 5 of the Draft Environmental Statement (Volume 2) (Draft ES) prepared by RSK, dated 03/11/2022.

The LVIA provides an assessment of the effects on the special qualities of three of the BBNP's Landscape Character Areas (LCA7, 8 and 9). It assesses nine viewpoints (VP) within the BBNP, including cumulative effects, plus night-time effects from viewpoints. Of the viewpoints outside the National Park, several include wide expanses of the BBNP seen in juxtaposition with the proposed development.

The LVIA concludes there would be significant effects on:

- Special qualities of peace, tranquillity, and remoteness on the localised area of LCA9: Mynyddoed Llangatwg and Llangynidr, within 3km of the site;
- VP8 - Cefn y Ystrad - 2.7km north of the site. For recreational users all turbines would be visible, with a backdrop of the ridges between the Valleys, and the blades seen against the sky. From this viewpoint much of the development within the Heads of the Valleys corridor and the valley is hidden by the landform;
- VP15 - Garn Ddu, north of Merthyr Tydfil, at 5.2km distance. For recreational users all turbine hubs and blades would be visible against the skyline, and therefore all lights seen at night-time;
- VP18 - Brecon Beacons Way at Craig y Fan Ddu, at 7.8km distance. All blades and hubs would be seen above the skyline, and therefore all the lights visible at night-time. All the other development along the Heads of the Valleys corridor, including other local turbines, are hidden from this viewpoint, thereby increasing the magnitude of change.

The LVIA concludes that at greater distances (e.g. VP24 - Pen-y-Fan at 12km) and where the receptors are road-users (e.g. VP21 - A4059 at 10.4km, and VP19 - B4560 at 8.3km), the effects would not be significant, although from these viewpoints all the turbines would be visible.

Whilst we agree there would be significant adverse effects on these landscape and visual receptors, we consider the significant effects on the special qualities of the BBNP are likely to extend beyond 3km, as far as 12km (Pen-y-Fan) to the north and approximately 10km (Mynydd Llangatwg) to the east, and 6km (Garn Ddu) to the west. We also consider there are more sensitive visual receptors at some of the viewpoints than indicated in the LVIA. The visual effects on recreational users of the open access land on either side of the B4560 are likely to be significant.

In most cases, turbine lighting from these viewpoints would not be back clothed by distant higher ground nor seen in context of Heads of the Valleys settlements, therefore they would interfere with the night sky.

The LVIA also concludes there would be significant effects from the following ridge-top viewpoints, looking towards the BBNP:

- VP9 - Rhymney Common at Rhymney Hill, approximately 3.4km from the site. All the turbines would be seen, plus the network of access tracks, with the open slopes of the BBNP behind;
- VP16 - Pen Garnbugail on Gelligaer Common at approximately 6.8km. The BBNP plateau rising to distant distinctive skyline of Pen y Fan and Corn Ddu would form the backdrop and detract from the distant view.

The LVIA concludes that from viewpoints on other ridges where there are wide views towards the BBNP but at a greater distance (e.g. VP17 - Cefn Manmoel at 7.7km), the effects would not be significant.

Whilst we agree with the significant and non-significant visual effects from these viewpoints, the indirect landscape and visual effects on the BBNP from these viewpoints have not been assessed. We consider these effects on the National Park's LCA7 - Central Beacons and LCA9 - Mynyddoed Llangatwg and Llangynidr and its setting are likely to be significant.

Throughout, the cumulative effects are assessed to be minor at most and therefore the proposed development would have no significant cumulative effects.

We agree there would be no significant cumulative effects. However, the proposed turbines would be more than twice the height of the various single or small groups of turbines currently situated along the Heads of the Valleys corridor and on the ridges between the Valleys. Therefore, their effects are likely to be perceived as diminishing the overall scale of the receiving landscape and the contiguous parts of the BBNP. This would erode the special qualities of remoteness and sweeping grandeur to a significant and unacceptable extent.

It is clear from the LVIA there would be widespread changes to the setting of the BBNP. The proposed development would represent a major change to this important corridor of open land that separates the BBNP from the busy Heads of the Valleys corridor with its associated settlements and industrial development.

Therefore, we consider the resultant significant adverse effects of the proposed development on the BBNP are unacceptable. Overall, we consider the significant adverse effects on the BBNP cannot be mitigated except by relocation of the development away from this site.

In consideration of the above, we would recommend the application should be refused.

Notwithstanding the above, should the decision-making authority be minded to grant permission contrary to our advice, we have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected species, ornithology and water quality. We also advise based on the information submitted to date, we would ask the decision-making authority to include conditions for protected species and pollution prevention on any planning permission granted. Further details are provided below.

Ecology

Protected Species

Bats, great crested newts and otters, and their breeding sites and resting places, are protected under the Conservation of Habitats and Species Regulations 2017. Where European Protected Species (EPS) are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

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

Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN 5) states the Local Planning Authority should not grant planning permission without having satisfied itself the proposed development either would not impact adversely on any EPS on the site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied.

Water voles are fully protected under the Wildlife and Countryside Act 1981 (as amended).

Bats

Confirmation is provided that no trees, buildings or other structures are present on site which may support roosting bats.

The 2019 bat surveys in the Bat Survey Report prepared by SLR Consulting, dated January 2022, were based on a five-turbine scheme which was then revised. The 2020 bat surveys in the 2020 Bat Survey Report prepared by SLR Consulting, dated September 2022, were based on a seven-turbine scheme.

Published survey guidance advises static detectors should be placed at all proposed turbine locations for schemes of less than 10 wind turbines. In consideration of the scheme now proposed as set out on Figure 3.1: The Proposed Scheme prepared by RWE, dated 01/11/2022, and the location of the static detectors deployed for the 2019 and 2020 activity

surveys, there appears to be some disparity between the siting of some of the static detectors and the proposed turbine locations. Therefore, you should provide further information in your planning application to clarify the locations of each of the detectors for the 2019 and 2020 surveys in relation to the location of each of the turbines now proposed, and justification for the siting where any are not at a turbine location.

Impacts on bat species at moderate and/or high risk of collision with wind turbines

We welcome the use of the online Ecobat tool to analyse the bat activity data obtained, to categorise the levels of activity recorded at the site. However, this has been done for all turbine locations combined across all seasons, and we note there was a peak in bat activity by pipistrelle bats (species at high risk of collision with wind turbines) during summer 2020. Therefore, you should provide further information with your planning application of an Ecobat analysis of the data for each of the bat species at moderate and high risk of collision from wind turbines, for each proposed turbine location, for each season, for the 2019 and 2020 surveys.

Summary

To advise further on the proposed scheme you should provide the following further information in your planning application:

- i. For each of the survey years (i.e. 2019 and 2020) a map showing the location of the static detectors in relation to each of the turbine locations now proposed and, where the detectors have not been placed at a turbine location, a justification for their siting and how the data obtained is applicable to the turbine location; and,
- ii. The results of an Ecobat analysis of the data for each bat species at moderate and high risk of collision with wind turbines, for each proposed turbine location, for each season, for the 2019 and 2020 surveys.

Notwithstanding the above, we welcome the commitment in section 7.8.7 of the Draft ES to feather the blades of all wind turbines. This is a simple way to reduce the impacts of wind turbine developments on bats without compromising energy generation.

Condition 1: We would request the decision-making authority attach an appropriately worded condition to any planning permission granted to secure the detail to feather the blades of all wind turbines.

Great Crested Newts

The Great Crested Newt Survey Report V2 prepared by SLR Consulting, dated September 2022, concludes Great Crested Newts are unlikely to be affected by the proposed development. Therefore, we would have no further comment on the proposals with regards to this species.

Otters & Water Voles

The Otter and Water Vole Survey Report prepared by SLR Consulting, dated September 2022, concludes these species are unlikely to be affected by the proposed development. Therefore, we would have no further comment on the proposals with regards to these species.

Ornithology

We consider it is not clear in Chapter 8 of the Draft ES how our EIA Scoping advice has been fully taken into consideration. The list of target/receptor species does not reflect, for example, our advice in relation to the designated bird features of Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest that should be scoped in. The list of target/receptor species needs to consider species listed under Section 7 of the Environment Act (Wales) 2016 as well as those listed on the Red List (BoCC Wales).

We note the 2020 survey data confirms four pairs of curlew have been identified with 800m of the turbines. We advise further information is provided in your planning application to address how curlew displacement will be avoided or mitigated for.

Furthermore, we consider it is not clear why winter walk over surveys were not undertaken. We advise further information is provided in your planning application to adequately justify this.

Summary

To advise further on the proposed scheme you should provide the following further information in your planning application:

- i. Further information on curlew displacement and how it will be avoided or mitigated for; and,
- ii. Justification on why winter walk over surveys were not undertaken.

Additional ornithology information was received on 12 December 2022. If this information changes our response, we will advise you in due course.

Advice on Habitat Restoration

The Outline Habitat Management Plan prepared by SLR Consulting, dated October 2022, identifies an area of approximately 22.6ha in the north-east of the site for heathland restoration and management. We consider the area for heathland restoration and management should be larger, at least 38.7ha, to compensate for both the predicted permanent loss of 10.16ha and the temporary loss of 16.1ha of upland habitat. This is to safeguard against the possibility the temporarily lost habitat might not return to the quality it once was.

We would advise the whole of the site be subject to improved management to mitigate the impacts of the scheme, not just the isolated north-eastern of the site. This would provide significant habitat improvements for the vegetation communities as well as all the species that use this site, especially the wading birds.

We advise you should endeavour to secure grazing management of the site in the long term and agreements should be sought with the local graziers to ensure this so the site can improve in its quality over the duration of the wind farm and beyond.

Advice on Watercourse Crossings

Chapter 6 of the Draft ES confirms there will be three river crossings plus a crossing over an artificial watercourse. There are three types of watercourse crossings shown in Figure 3.10: Indicative Watercourse Crossing prepared by RWE, dated 29/07/2022 - closed pipe culvert, bottomless arch culvert, and single span bridge. Whereas the closed pipe culvert is the only watercourse crossing option mentioned in Chapter 6 of the Draft ES.

Closed pipe culverts are not adaptable to future flow increases and are susceptible to geomorphological change and will impact on the in-river ecology. A Resilient Wales, one of the seven well-being goals outlined in the Well-being of Future Generations (Wales) Act 2015, is defined as “A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change.” Therefore, we consider the single span bridge would be the preferred watercourse crossing. If this is not feasible, you should provide further information in your planning application outlining why a closed pipe culvert or bottomless arch culvert was chosen.

Water Quality

Chapter 6 of the Draft ES and Figure 6.7: Water Quality Monitoring prepared by RWE, dated 31/10/2022, provide details of water quality monitoring locations (WQ1-WQ6). WQ4 appears to be a monitoring location appropriate for proposed turbine areas 4 and 5. WQ3 appears to be an upgradient/baseline water quality monitoring location. We advise an extra water quality monitoring location is added just to the east of proposed turbine area 2.

Figure 6.4: Hydrological Catchments prepared by RWE, dated 31/10/2022, shows the extent of the Source Protection Zone (SPZ) and that proposed turbines 1, 2, 4 and 5 are located within the SPZ. We advise you provide further information in your planning application justifying the choice of turbine locations and demonstrating alternative locations have been considered.

The depth to groundwater is unknown, notably within the SPZ area. We request the depth to groundwater be determined, notably for Turbines 1, 2, 4 and 5 as this information will inform upon the nature of the Source-Pathway-Receptor linkage that describes the relationship between the groundwater within which the turbines will be constructed and operate and local surface water courses. There are no groundwater monitoring wells proposed, notably at the proposed turbine foundations particularly those within the SPZ. The information on the depth to groundwater and notably the increased protection afforded to the SPZ by the presence of a suitably thick unsaturated zone, would be determined by the installation and monitoring of suitable boreholes within the SPZ.

Figure 6.3: Peat Depth Overview prepared by RWE, dated 31/10/2022, shows the extent of peat at the proposed development site. Peat and organic rich soils are typically acidic. It is not clear what type of concrete will be used to ensure the longer-term degradation of concrete does not result in increases in alkalinity in both surface water and groundwater, notably within the SPZ and/or in locales near water courses. You should provide further information in your planning application regarding this.

In our EIA Scoping response we advised 'It would be useful to have a baseline surface water drainage map generated as well as similar maps for the construction and operational phases.' We maintain this advice. You should provide this information in your planning application.

Table 6.14 in the Draft ES outlines recommended 'stop' conditions for earth moving activities. You should provide further information in your planning application confirming how a stop status be determined i.e. as the table is specific in terms of rainfall accumulations will there be a rain-gauge installed on site?

Pollution Prevention

We note an outline Construction Environmental Management Plan (CEMP) is provided. Section 6.6.3 of the Draft ES confirms a full CEMP will be delivered by the contractor and will include the measures from the outline CEMP. We would request the decision-making authority attach the following condition to any planning permission granted:

Condition 2: No development shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable; details of site clearance; details of site construction drainage; containments areas; appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain;
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures;
- Soil Management: details of topsoil strip, storage and amelioration for re-use;
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures;
- Control of Nuisances: details of dust control measures;
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use;
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities;
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan;
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details;
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

We would recommend that when preparing the CEMP and any associated Pollution Prevention Plan, you refer to the [Guidance for Pollution Prevention \(GPPs\)](#) documents, specifically GPP1: Understanding your environmental responsibilities – good environmental practices and GPP5: Works and maintenance in or near water. All work should avoid entering watercourses, but if this is unavoidable, such as in the case of installing watercourse crossings, the time spent in the watercourse should be minimised and suitable mitigation measures put in place to prevent mobilisation of silt or other pollutants.

No phase of construction may cause a discharge of any polluting materials, for example silt, to any watercourse. Should any spills occur, appropriate measures to contain and clean up these spills must be taken immediately, according to an incident response plan. Any discharges to the water environment must be self-reported to us on 0300 065 3000 immediately.

Peat

The proposed development will have an impact on the peat resource on site.

As illustrated in Figure 6.1.3b: Peat Depth Mapping Overview prepared by RWE, dated 31/10/2022, and from the calculations, approximately 30% of the proposed infrastructure goes through areas of peat 40cm deep and greater. Turbine site one could lead to impacts upon an area of peat greater than 250cm deep. Furthermore, large areas of hardstanding adjacent to or within peat bodies can cause increased erosion of the retained peat around it. We consider you should be seeking to avoid all impacts on areas classed as deep peat which is 40cm and above. Figure 6.1.3b indicates there may be areas suitable to avoid the deep peat. Therefore, we would advise the turbines and tracks be located away from areas of deep peat. The implications of turbine and track relocation would also need to be re-assessed in terms of Landscape and EPS impacts.

The Outline Peat Management Plan prepared by RSK, dated November 2022, states 6,879 m³ of peat needs to be excavated for the tracks leading to the turbines. For the tracks, where deep peat cannot be avoided, we would advise “floating roads” are used which would sit on top of the peat and thus limit the amount of peat lost.

Section 6.7.6 in Chapter 6 of the Draft ES refers to offsite peatland restoration opportunities within BBNP being provided to compensate for the loss of peat at this site. Whilst you should provide further information in your planning application of the proposed measures, we would advise further efforts are made to avoid peat impacts on site before you consider off site compensatory measures. We consider it is more appropriate to reduce and avoid impacts on site in the first instance.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

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

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

Advice for the Developer

The documents contain reference to the potential use of a Siltbuster system. If it is determined that chemical dosing of water will take place, a water quality discharge permit will be required. Please see our website for further information: [Natural Resources Wales / Apply for a permit to discharge trade or mixed effluent](#). Please note, it can take up to 4 months to determine a permit application, so it is important any permit applications are submitted well in advance of construction commencing.

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

Yn gywir / Yours faithfully

Sarah Lund

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

Relevant Persons

- None.

Other Interested Parties

- Babcock International (on behalf of Wales Air Ambulance) (OP1)
- National Air Traffic Service (NATS) (OP2)
- Wales and West Utilities Ltd (OP3)
- Merthyr Valley Ramblers Association (OP4)
- South East Wales River Trust (OP5)
- Ministry of Defence (OP6)
- Colin Thomas (Dowlais Pony Improvement Society & Commoner) (OP7)
- Dŵr Cymru Welsh Water (OP8)
- Gelligaer and Merthyr Commons Association (OP9)
- Bristol Airport (OP10)
- Bannau Brycheiniog National Park Authority (OP11)
- National Grid (OP12)
- Open Spaces Society (OP13)
- Caerphilly Ramblers (OP14)
- Civil Aviation Authority (OP15)

Daniel Patterson

From: Jenkins, Tulki <Tulki.Jenkins@babcockinternational.com>
Sent: 01 November 2022 09:35
To: Pen March Project
Subject: [EXT] RE: CAUTION: External email - Proposed Pen March Wind Farm - Notice of Statutory Consultation (UNCLASSIFIED)

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Classification: UNCLASSIFIED

Hi Jenny,

Thanks for the attached. The only other stakeholders in terms of low level flying in South Wales are Bristow Group (HM Coastguard), Ministry of Defence and National Police Air Service. The latter two I believe have a web contact us portal and a contact at Bristow group is steve.whalley@bristowgroup.com

Best Wishes

T 😊

Tulki Jenkins | Capture and Business Development Manager
UK Aviation | Aviation
Babcock International Group
Babcock Onshore | Building Se32-33 | Gloucestershire Airport | Cheltenham | Gloucestershire | GL51 6SP
Mob: +447801952491 | Tulki.Jenkins@babcockinternational.com
www.babcockinternational.com

babcockTM

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From: sophie.bennetrees@rwe.com <sophie.bennetrees@rwe.com> **On Behalf Of** penmarch@rwe.com
Sent: 31 October 2022 11:51
To: Jenkins, Tulki <Tulki.Jenkins@babcockinternational.com>
Subject: CAUTION: External email - Proposed Pen March Wind Farm - Notice of Statutory Consultation

Dear Mr Jenkins,

I write to notify you of the statutory, pre-application consultation period for the proposed Pen March Wind Farm. Consultation will run for 6 weeks from Thursday 3rd November to Thursday 15th December.

Emergency Helicopter Units have been identified as potential interested parties who may wish to respond to this consultation. I have been given your name as a point of contact for Wales Air Ambulance but also as someone who may be able to assist us with contacting other relevant units. Are you able to share contact details of the other emergency helicopter units please or do you have means of centrally distributing the information?

Please see the attached for a formal covering letter and notice.

Please contact me with any queries.

Regards,

Jenny Cowley

RWE Renewables GmbH

Renewables Europe & Australia

Development Project Manager – Pen March Wind Farm

Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX

M: +44 (0)7825 995347

mailto: penmarch@rwe.com

Web: www.rwe.com/rwe-renewables-uk

<https://uk-ireland.rwe.com/rwe-in-wales>

<https://uk-ireland.rwe.com/rwe-in-wales-welsh>

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Daniel Patterson

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 03 November 2022 09:49
To: Pen March Project; WRIGHT, Darren T
Cc: Coleman Aviation; NATS Safeguarding
Subject: [EXT] RE: Proposed Pen March Wind Farm - Notice of Statutory Consultation

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Jenny,
NATS is pleased to note the acknowledgement of the risk to the Brecon DVOR within the submitted documentation (section 12.5.14) and remain committed to keeping RWE abreast of the plans for the Brecon decommissioning in order to try and ensure that this risk is not realised.

Regards,
Alasdair
NATS Safeguarding

NATS Internal

From: sophie.bennetrees@rwe.com <sophie.bennetrees@rwe.com> **On Behalf Of** penmarch@rwe.com
Sent: 31 October 2022 11:37
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>; WRIGHT, Darren T <Darren.WRIGHT@nats.co.uk>
Subject: Proposed Pen March Wind Farm - Notice of Statutory Consultation
Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Representative of NATS,
I write to notify you of the statutory, pre-application consultation period for the proposed Pen March Wind Farm. Consultation will run for 6 weeks from Thursday 3rd November to Thursday 15th December. NATS have been identified as a potential interested party who may wish to respond to this consultation. Please see the attached for a formal covering letter and notice.
Please contact me with any queries.

Regards,

Jenny Cowley

RWE Renewables GmbH

Renewables Europe & Australia

Development Project Manager – Pen March Wind Farm

Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX

M: +44 (0)7825 995347

mailto: penmarch@rwe.com

Web: www.rwe.com/rwe-renewables-uk

<https://uk-ireland.rwe.com/rwe-in-wales>

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Sophie Bennet Rees

Origination Manager

RWE Renewables UK Limited

Unit Renewables Europe and Australia

Mobile: +44(0)7917493069

Email: sophie.bennetrees@rwe.com

RWE Renewables Management UK Limited

Windmill Hill Business Park

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Swindon SN5 6PB

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Daniel Patterson

From: Alex Forster <Alex.Forster@wwutilities.co.uk> on behalf of Dig (Shared Mailbox) <Dig2@wwutilities.co.uk>
Sent: 03 November 2022 11:19
To: Pen March Project
Cc: Bennet Rees, Sophie
Subject: [EXT] RE: Proposed Pen March Wind Farm - Notice of Statutory Consultation

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Good Morning/Afternoon,

As there are HP gas main in vicinity of the proposed works, more investigation is required

Can you please provide the following information, at least **10 working days** before your works are due to commence, so we can establish whether or not a site visit is necessary;

- A plan showing the exact location and extent of your works along with a full site address
- An overview of the works taking place
- Site contact details
- The date that your works are set to commence
- A copy of your Risk Assessment and Method Statement (RAMS), if you are planning any excavation within the vicinity of our pipeline

Works in close proximity to a Medium, Intermediate or High pressure main cannot commence until you have received approval from Wales & West Utilities.

Please respond to Dig@wwutilities.co.uk to ensure your response is actioned.

Kind Regards,

Alex Forster

Plant Protection Team, Administrative Assistant

Tel: 02920 278912 | Direct: 02920 278736 | Email: Alex.Forster@wwutilities.co.uk

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Coedkernew | Newport | NP10 8FZ



"Our privacy notice can be found on our website (<http://www.wwutilities.co.uk/legal/>) or a paper copy can be provided to you on your request. This sets out how we will collect and use information about you."

Please note, that from Monday 11th July, our cost for the provision of mapping data through LSBUD will increase to £47 +

From: sophie.bennetrees@rwe.com <> **On Behalf Of** penmarch@rwe.com

Sent: 02 November 2022 14:34

To: Enquiries <Enquiries@wwutilities.co.uk>; Sophie Dawkins <Sophie.Dawkins@wwutilities.co.uk>

Subject: Proposed Pen March Wind Farm - Notice of Statutory Consultation

[Caution: This email has been sent from outside Wales & West Utilities]

Dear Wales and West Utilities,

I write to notify you of the statutory, pre-application consultation period for the proposed Pen March Wind Farm. Consultation will run for 6 weeks from Thursday 3rd November to Thursday 15th December.

Wales and West Utilities have been identified as a potential interested party who may wish to respond to this consultation. Please see the attached for a formal covering letter and notice.

Please contact me with any queries.

Regards,

Jenny Cowley

RWE Renewables GmbH

Renewables Europe & Australia

Development Project Manager – Pen March Wind Farm

Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX

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mailto: penmarch@rwe.com

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Daniel Patterson

From: Alan Hancox <alan_h_ramblers@aol.com>
Sent: 03 November 2022 22:03
To: Pen March Project
Subject: [EXT] Re: Proposed Pen March Wind Farm - Notice of Statutory Consultation

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Hello Jenny, thank you for your email, much appreciated. I've been going through your website, there's a lot there so I couldn't comment at the moment. Could I be included on any information mailing lists please?

Thanks

Alan Hancox,
Chair and Footpath Officer
Merthyr Valley Ramblers
alan_h_ramblers@aol.com

[Sent from the all-new AOL app for iOS](#)

On Wednesday, November 2, 2022, 2:46 pm, penmarch@rwe.com wrote:

Dear Morfydd and Alan,

I hope you don't mind me contacting you. I am trying to contact the organiser of Merthyr Valley Ramblers and your names were identified on the website.

I write to notify the Merthyr Valley Ramblers of the statutory, pre-application consultation period for the proposed Pen March Wind Farm. Consultation will run for 6 weeks from Thursday 3rd November to Thursday 15th December.

Merthyr Valley Ramblers have been identified as a potential interested party who may wish to respond to this consultation. Please see the attached for a formal covering letter and notice.

If you are not the relevant contact, are you able to forward this email please?

Please contact me if you have any questions.

Regards,

Jenny Cowley
RWE Renewables GmbH

Renewables Europe & Australia
Development Project Manager – Pen March Wind Farm

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Daniel Patterson

From: Paul Kent <paul.kent@sewrt.org>
Sent: 07 November 2022 15:19
To: Pen March Project
Subject: [EXT] Nant Morlais and Nant Pitwellt

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Dear RWE staff.

I am the project officer for the South East Wales Rivers Trust with responsibility for the Taff and Rhymney catchments.

The rivers trusts exist to maintain and improve fisheries and habitat within the various catchments. This is done in partnership with local fishing clubs, NRW, wildlife trusts, local authorities, landowners and businesses.

The work covers a wide range of activities from full river surveys through weir removal or the commissioning of fish passes, to works benefitting individual species such as water vole and otter.

I note that the proposed Penmach wind farm encompasses the head waters of the Nant Morlais and Nant Pitwellt as well as Jepson's pond.

Whilst, due to obstructions downstream, neither the Morlais nor Pitwellt are Salmon / Sea Trout streams, they are valuable for invertebrates and do maintain populations of brown trout although these are primarily downstream of the proposed work site.

Naturally, we have some concerns over works on or adjacent to these watercourses and would like to be kept informed on progress of the project and would be willing to offer advice on the management of the streams and wetlands.

Finally, it should be noted that Jepson's pond is occasionally used by outdoor swimmers.

Yours with thanks

Paul

Paul Kent
Project Officer
South East Wales Rivers Trust
Taffs Fall Road
Treforest Industrial Estate
CF37 5TT
07814 504623
<https://w3w.co/skim.airfields.dustbin>





Defence Infrastructure Organisation

Wendy Talbot
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: DNS/3253147

MoD Telephone: 07815487744

E-mail: dio-safeguarding-wind@mod.gov.uk

Our Reference: DIO 10050807

Jenny Cowley
RWE Renewables UK Swindon Ltd
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

15 November 2022

Dear Jenny

Please quote in any correspondence: DIO 10050807

Site Name: Pen Marsh Wind Farm

Site Address: Pen March Wind Farm, Gelligaer and Merthyr Common

Thank you for your pro-forma requesting pre-application advice from the Ministry of Defence (MOD) regarding your proposed wind energy development.

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 inform you that the MOD may have concerns about the proposal.

Our assessment has been carried out on the basis that there will be 6 turbines at 179.55 metres in height from ground level to blade tip and located at the grid references below:

Turbines	Easting	Northing
1	307700	210934
2	308211	210971
3	308073	210032
4	309102	210569
5	308663	210672
6	308560	210066

Low Flying

Fixed Wing military low flying training takes place throughout the United Kingdom down to a height of 250ft above ground level and in certain designated areas down to a height of 100ft above ground level. A turbine development of the height and at the location you propose may have an impact on low flying operations. We have produced a map which indicates areas in the UK where the MOD is more likely or less likely to object to wind turbine planning applications on the grounds of interference with low flying operations. The following link will take you to this map, which has been produced only for guidance and does not offer definitive advice on the MODs position

<http://webarchive.nationalarchives.gov.uk/20140802171818/https://restats.decc.gov.uk/cms/aviation-safeguarding-maps/>

Regardless of whether we object to your proposal, it is probable the MOD will request the turbines be fitted with MOD accredited visible or infrared aviation safety lighting.

Meteorological Office Radar

The Met Office is now a statutory consultee for planning relating to their technical infrastructure, therefore the MOD has not informed the Met Office of this pre-application. If your development falls within any of the Met Office safeguarded zones you will need to contact the Met Office directly. More information is available on the Met Office website at:

<http://www.metoffice.gov.uk/learning/library/publications/safeguarding>

Please note that DIO staff will not be able to provide any information regarding the operational impact of your development over and above that which is contained in this letter.

Unless directed otherwise, the Ministry of Defence will treat all pre-application information in confidence and the information will only be used or disclosed in accordance with the wishes of the confider.

MOD Safeguarding wishes to be consulted and notified about the progress of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

I hope this adequately explains our position on the matter. Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

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

Yours sincerely

Wendy Talbot
Safeguarding Officer
DIO Safeguarding

Daniel Patterson

From: colin.thomas18@btinternet.com
Sent: 16 November 2022 10:43
To: Pen March Project
Subject: [EXT] RE: Proposed Pen March Wind Farm

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Good morning Jenny

Apologies for the late response to your email below.

Thank you for the attached information.

Please note that the fence line above the old common land is not a legally erected to the best of my knowledge - this fence was put in place to prevent animals straying onto the A465 when the dualling was in process. I know in the past that there has been representations made about this fence denying access to the grazing land below the road. My concern is that there has never been a section 194 applied for the fence to be erected and as it stands it is illegally there. If challenges were made the access road gateway that you have within the plan for erecting and maintenance of the turbines maybe become a legal problem.

If you want to give me a call to discuss this please do so.

Regards Colin

From: jenny.cowley@rwe.com <jenny.cowley@rwe.com> **On Behalf Of** penmarch@rwe.com
Sent: 31 October 2022 09:23
To: colin.thomas18@btinternet.com
Subject: Proposed Pen March Wind Farm

Dear Mr Thomas,

It was nice to see you and to meet Chris last week. Thank you for your time.

The draft application is being finalised and we will start statutory, pre-application consultation on Thursday 3rd November. It will run for 6 weeks until Thursday 15th December. This is the point at which we are seeking comments from interested parties.

I attach a formal covering letter and notice of the consultation which I am issuing to you both as a Common Land grazing rights holder and on behalf of Dowlais Pony Improvement Society.

To recap on some of the points we discussed:

The wind farm application will comprise of three separate applications:

- The planning application for the wind farm
- An application to deregister and replace common land
- An application to undertake works on the common

All three applications will be submitted to the Welsh Government, likely early next year.

In terms of the direct impact on the common, the full detail is within the application documents however, the key points of the proposal to note are:

- Deregister and replace 34.72Ha of common land
- We envisage that the working area required for construction will be 23.07Ha (11.65Ha still available for grazing)
- Post construction, the land take on the common will be 3.5Ha (so 31.18Ha of released land will still be available for grazing)
- The area of land which will not be accessible at all due to infrastructure will be 0.51Ha (the turbines and the electrical compound).

Please note that these figures do not include the footprint of turbine 4 and a small amount of track leading to this turbine as it is not located on common land.

We would not intend to seek to reduce stocking levels on the common and would be keen to work with all users of the common to make the construction process as smooth as possible.

I hope this is helpful. Please contact me if you would like to discuss anything, or feel free to attend one of our exhibitions as outlined in the attached letter.

Regards
Jenny

Jenny Cowley

RWE Renewables GmbH

Renewables Europe & Australia

Development Project Manager

Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX

M: +44 (0)7825 995347

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Mr Colin Thomas
Rhosbren Fach
Llewellyn Street
Dowlais
Merthyr Tydfil
CF48 3SP

December 31st 2022

Dear Jenny,

Firstly my comments relate to my rights as a registered commoner.

The whole area of the Merthyr and Gelligaer Common is registered as one-unit 2985 hectares. The separation points of the common is only legally contained by a road management cattle grid Near Blaen Carno which is situated below the A465 Heads of the Valley Road.

I was born and reared and owned property at Gypsy Castle until very recently, so, I am very familiar with the layout of the common across its entire area.

The common land between the Heads of the Valley and the old Rhymney common road should not be isolated, this has never been taken out of the common. The fence now in situ at the top side of the old common road was a temporary agreement to stop animals straying onto the A465 while dualling was under construction.

I agree the fence is a safety barrier for animals and road users, but for the fence to be there permanently, a section 194 of The Law and Property Act 1925 should have been applied for.

Within the application there should have been animal underpasses put in place, peoples common and grazing rights and access to their holdings were illegally taken away to suit some people who were not even grazing that side of the common at the time.

I have not received any paperwork from the Commoners Association, nor the Welsh Government stating that there has been a reduction in common grazing rights - because of this large area of land being landlocked from the common, if the fence is removed there is no physical barrier stopping animals going down through Gypsy Castle bridge onto the cycle path and animals can trespass onto the A465 or stray into local villages.

With regards to the replacement land that you are offering to register for Merthyr and Gelligaer Commoners Association. In my view, you have not done the legal groundwork on who has legal title on this area. Looking back on historical maps, this area of land has never been registered or under any restrictions whatsoever for centuries - when was it titled to the present owner...?

When entering in agreements of replacement land, principles are there for everyone not just a few, the way this is proceeding is very wrong and is slanted. Furthermore, if it proceeds on the lines you have set-out it will face legal challenges.

I have been kind enough to supply you with a lot of evidence on a "Without Prejudice and Strictly Confidential basis" to support the claim of a de facto individual right over this whole area.

As Hon Secretary of Dowlais Pony Improvement Society and the membership have instructed me through a meeting to registered the same de facto claim.

I and the Dowlais Pony Improvement Society membership as a whole have grazed registered semi-feral Welsh Mountain Ponies for over 60 years. The membership of Dowlais Pony Improvement Society has grazed under this title and has been registered with the Welsh Pony and Cob Society under that title since 1952.

Prior to the change of name in 1952 they grazed under Dowlais Pony Club and was traced back to its origin of 1890 or thereabouts.

In 2007 along with the assistance of the Commoners of Wales. I applied for derogation status for registered semi-feral hill ponies. The Welsh Government granted the derogation in 2008 on behalf of the hill societies across Wales. Since that time, every Society across Wales has to complete and return a Welsh Government annual Management Plan.

Under Glastir – due to the hill ponies characteristics and history, the Welsh Government has allowed for the ‘Semi-feral Welsh Mountain Section A ponies’ that are managed through the Hill Pony Improvement Society of Wales and Cymdeithas Merlod y Carneddau to remain on the commons and marshes throughout the year [glastir-commons-general-rules-booklet-2020-2021.pdf](#)

At this point, I would remind the Welsh Government assesses breaches against verifiable standards relating to the Glastir scheme, which has strict eligibility criteria. It is incumbent under the relevant Commoners Association and the claimants to act constitutionally correct when formulating and agreeing a scheme funded by Government sources. Individuals applying for payments must act with probity and transparency when agreeing and signing, it is public money and when challenged it comes under the scrutiny of the Welsh Government Audit Office and their apply findings and penalties accordingly.

In your presentation Ecological and ornithological surveys carried out, you have mentioned many protected species focusing on protected animals such as great crested newts, badgers, otters and water voles, and on birds, particularly breeding waders and raptors. It is a known fact that ponies assist biodiversity widely – why hasn’t this been recognised and mentioned in your presentation, you have had the information from me and it baffles why such an important part of support for biodiversity has been avoided!!

These ponies attract visitors from across the globe, they form a culture and heritage and because of their grazing patterns, which open up dense areas of bracken gorse etc, they have helped to shape through the millennia the beautiful landscape we have in Wales. They also contribute greatly to the Well Being Future Generations (Wales) Act 2015.

For you and others information, over many years I have been involved with senior ecologists and I have also been a director with PONT (Pori Natur a Threftadaeth) since its registration.

Through PONT and being Secretary for the Hill Pony Improvement Societies of Wales since 1989, I have been involved with many major studies of the Semi-feral hill ponies.

At the moment, I am now assisting a leading UK University research department with the contribution pony grazing gives to many walks of life here in Wales.

Due to other commitments, bereavement and illness, I haven’t had time to fully review your biodiversity study as yet, but on a quick scan through, I certainly don’t think you have given the iconic breed of ponies adequate thought or respect on their values they have on natural habitats and landscapes (I attach a few photos of a group of ponies grazing in an area that you propose to put the wind turbines on).

I realise that a lot of my comments above is legal and I know some of the commoners in the area has clouded the issues with yourself regarding the Dowlais Pony Improvement Societies grazing rights (I have received a verbal report of the meeting) – we are open to a challenge from them on this. The application for replacement land will have to be handled by the Welsh Government and I will inform them of ALL issues of what I allege is wrongdoing in the area.

I am aware that it could mean that the application could be submitted and all matters be reserved, but I will request for a suspension of the application under the various concerns mentioned. When

considering my final objection to the proposed application, I will seek further planning advice from a professional body that I am a member of.

I also apologise for the delay in responding, but I would like you to inform all parties of my concerns which I deem as serious. In my view, any organisation or professional body that has been made aware of any wrongdoing, if found to be true, they will be complicit with the morally wrongs and scrutiny must be taken of anyone involved.

I also understand that there has been a claim made for payments over a number of years for a subsidy payment for a small number of graziers on the Northern side of the Heads of the Valley.

When and where did the meeting take place. No notices or agenda were served to myself - were minutes taken? Great care should be taken when arranging and conducting a meeting so that it complies with the Associations Constitution and all other general principles of a meeting?

I and the members fully understand the present climate crisis, but we are also concerned of the points raised above, and in addition there has not been a balance given in grazing habits, wildlife preservation, local historical consultation, landscape and visual impact to properties of surrounding areas, estimate of energy output produced etc.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Colin Thomas'.

Colin Thomas

Ms Jenny Cowley
RWE Renewables GmbH
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

Date: 18/11/2022
Our Ref: PPA0007325

Dear Ms Cowley

Grid Ref: 308489 209992

Site Address: Pen March Wind Farm at Gelligaer and Merthyr Common, Merthyr

Development: DNS - the construction and operation of a wind farm, battery energy storage systems 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.

We refer to your “consultation before applying for planning permission” in accordance with Article 9(3) of the Developments of National Significance (Procedure) (Wales) Order 2016. We note that the consultation relates to Pen March Wind Farm at Gelligaer and Merthyr Common which refers to a “the construction and operation of a wind farm, battery energy storage systems and associated infrastructure”.

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:

This application falls within a Drinking Water Protected Area under article 7 of the Water Framework Directive. This article requires the UK to take action to protect drinking water sources. Section 7.3 states that the aim is ‘to avoid deterioration in water quality where this may lead to additional purification treatment being required’.

The proposed development falls within the Dwr Cymru Welsh Water (DCWW) Drinking Water Catchment known as Rhymney Bridge. The site is approximately 0.1 km from the nearest water course.

Further information from the applicant to assess the impact of the proposed development on drinking water quality is required as follows:

- A copy of the Environmental Impact Assessment as not available for review on the online documents.
- Mitigation plans for any potential increase sediment / pollution to the watercourse of Nant Pitwellt to review as part as a DCWW response.
- We will need transport plans especially for 2 watercourse crossing, as well maps to where the crane hardstanding and laydown/storage area will be.
- Further detail around any natural buffer zones, for any natural buffer zones what distance would these be allocated from the watercourse Nant Pitwellt?

Turning to drainage, it appears the application does not propose to connect to the public sewerage system or potable water network, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances change and a connection to the public sewerage system/potable water network is preferred we must be re-consulted on this application.

In addition, as of 07/01/2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales.

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.

Please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.



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.

Whilst it appears the application does not propose to connect to the public watermain system, we would advise that the proposed development is crossed by watermain, with their approximate positions being shown on the Statutory Public Watermain Record. Dwr Cymru Welsh Water as Statutory Undertaker has statutory powers to access our apparatus at all times. We enclose our Conditions for Development near Watermain(s). It may be possible for these watermain to be diverted under Section 185 of the Water Industry Act 1991, the cost of which will be re-charged to the developer. The developer must consult Dwr Cymru Welsh Water before any development commences on site.

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. For information as to our requirements the developer should contact us on 0800 917 2652. Further information regarding Asset Protection is provided in the attached Advice and Guidance note. We trust that you'll find our comments of assistance for the purposes of this pre-application consultation, and we respectfully reserve the right to comment further on any matters and issues arising from ongoing and future consultation. We look forward to continuing our engagement on the project prior to and during the submission of an application to the Planning Inspectorate.

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,



Owain George
Planning Liaison Manager
Developer Services

Enc. Sewer plan, water plan

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.

CONDITIONS FOR DEVELOPMENT NEAR WATER MAINS

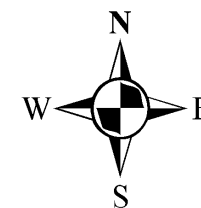
Location: Pen March Wind Farm, Merthyr

Date: 18.11.2022

The development of the site with our water main located as shown on the attached plan will involve certain conditions which must be strictly adhered to. These are:-

1. No structure is to be sited within a minimum distance which will need to be confirmed by trial holes and will be from the centre line of the pipe. The pipeline must therefore be located and marked up accurately at an early stage so that the Developer or others understand clearly the limits to which they are confined with respect to the Company's apparatus. Arrangements can be made for Company staff to trace and peg out such water mains on request of the Developer.
2. Adequate precautions are to be taken to ensure the protection of the water main during the course of site development.
3. If heavy earthmoving machinery is to be employed, then the routes to be used in moving plant around the site should be clearly indicated. Suitable ramps or other protection will need to be provided to protect the water main from heavy plant.
4. The water main is to be kept free from all temporary buildings, building material and spoil heaps etc.
5. The existing ground cover on the water main should not be increased or decreased.
6. All chambers, covers, marker posts etc. are to be preserved in their present position.
7. Access to the Company's apparatus must be maintained at all times for inspection and maintenance purposes and must not be restricted in any way as a result of the development.
8. No work is to be carried out before this Company has approved the final plans and sections.

These are general conditions only and where appropriate, will be applied in conjunction with specific terms and conditions provided with our quotation and other associated documentation relating to this development.



LEGEND(Representative of most common features)

Waste network:		
Foul chamber	Surface water chamber	Outfall
Combined chamber	Combined sewer overflow	Storm Overflow
Special purpose chamber	Treatment works	Rising main
Pumping station	Private sewer	Private sewer subject to Sect. 104 adoption agreement
NB: Sewer symbol colour indicates the type.	Private Sewer Transfer	Lateral Drain
RED - Combined	Inspection Chamber	
GREEN - Surface Water		
BROWN - Foul		
Purple - Former S24 sewers (for indicative purposes only)		

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 Cyfyngedig ('the Company') gives this information as to the position of its underground apparatus by way of general guidance only and on the strict 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 onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company, is done so in accordance with statutory requirements of sections 198 and 199 of the Water Industry Act 1991 which is based upon 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 disposal main and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision 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: 307947,208902
Map scale: 1:4250
Printed by: Gillian Williams
Printed on: 18 Nov 2022



Dŵr Cymru
Welsh Water

PPA0007325



LEGEND

Clean network:

Sluice valve

Pressure reducing valve

Meter

Bulk meter

FH

Hydrant

Cap end

Air valve

Stop tap

Water Treatment Works

Water Pumping Station

Existing main

Non-operational main

Raw Water

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

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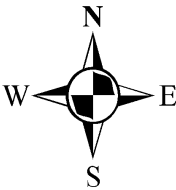
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Printed on: 18 Nov 2022



Dŵr Cymru
Welsh Water

PPA0007325



LEGEND

Clean network:

Sluice valve

Pressure reducing valve

Meter

Bulk meter

Hydrant

Cap end

Air valve

Stop tap

Water Treatment Works

Water Pumping Station

Existing main

Non-operational main

Raw Water

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 Cyfyngedig (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and on the strict 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 onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company, is done so in accordance with statutory requirements of sections 198 and 199 of the Water Industry Act 1991 which is based upon 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 disposal main and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision 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
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Printed by: Gillian Williams
Printed on: 18 Nov 2022

Daniel Patterson

From: Mark Ward <projects@gmcommon.org>
Sent: 25 November 2022 13:24
To: Pen March Project
Subject: [EXT] Gelligaer & Merthyr Common - End of Project Event

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Good afternoon,

Please find below an invite to the end of project event regarding our Comin Cydweithredol - Common Collaboration project on Gelligaer & Merthyr Common as discussed on the phone earlier.

Cofion gorau | Kind regards
Mark

Project Officer

Project Comin Cyweithredol | Common Collaboration Project
Gelligaer and Merthyr Common



-Scroll down for English-

Annwyl Partner,

Wrth i broiect Comin Cydweithredol - *Common Collaboration* Comin Gelligaer a Merthyr ddod i ben, hoffem eich gwahodd i ddathliad diwedd project. Bydd y dathliad yn gyfle i adlewyrchu ar y cynnydd a wnaed ac edrych at y dyfodol. Dyma fanylion y digwyddiad:

Dydd Gwener Rhagfyr 2^{il} 2022 – Canolfan Summit (Y Ganolfan Ddringo), Trelewis, CF46 6RD

10:10 - 10:30 - Cyrraedd, te & choffi ar gael

10:30 - 11:30 - (**Cychwyn swyddogol**) Cyflwyniadau am y project, llwyddiannau a gwersi a ddysgwyd.

11:30 - 12:30 – Y camau nesaf, cyfle i drafodcyfleodd cyllid at y dyfodol a phrojectau posib.

Dewisol

12:30 - 14:00 – Taith gerdded dywys neu mewn cerbydau dros y comin i weld y gwelliannau a wnaed, yn dibynnu ar y tywydd a niferoedd

Nes bod rhifau terfynol wedi eu cwblhau rydym yn cyfyngu sefydliadau/ partneriaid i ddau docyn. Ymunwch gyda ni wrth i ni ddathlu diwedd project pwysig i'r ardal leol. Atebwch os gwelwch yn dda erbyn 23/11/2022 at Mark Ward projects@gmcommon.org i gadarnhau eich bod yn mynychu ac os ydych am ymuno gyda ni yn y daith gerdded/ cerbyd ddewisol dros y comin.

Mae'r project wedi bod yn bosib trwy grant Cynllun Rheolaeth Gynaliadwy Cymunedau Gwledig Llywodraeth Cymru – Rhaglen Datblygiad Gwledig 2014-2020, rhan o Gronfa Amaethyddol Ewropeaidd ar gyfer Datblygiad Gwledig.

Cofion gorau

Mark Ward

Annwyl / Dear partner,

As the *Comin Cydweithredol - Common Collaboration* project on Gelligaer and Merthyr Common draws to a close, we would like to invite you to an end of project celebration. The celebration will be an opportunity to reflect on progress made whilst looking to the future. Details for the event are as follows:

Friday 2nd December 2022 - Summit Centre (Climbing Centre), Trelewis, CF46 6RD

10:10hrs - 10:30hrs - Arrivals, tea & coffee available

10:30hrs - 11:30hrs - (**Official start**) Presentation about the project, successes and lessons learnt.

11:30hrs - 12:30hrs - Next steps, an opportunity to discuss future funding opportunities and potential projects.

Optional

12:30hrs - 14:00hrs - Guided walk or drive of the common to see improvements made, weather and numbers dependant

Until numbers are confirmed, we are limiting organisations/partners with a maximum of two tickets. Please join us we celebrate the end of an important project for the local area. Please RSVP by 23/11/2022 to Mark Ward, projects@gmcommon.org to confirm attendance and if you intend to join us for the optional guided walk/drive of the common.

This project has been made possible by securing a grant from the Sustainable Management Scheme which is funded through the Welsh Government Rural Communities – Rural Development Programme 2014-2020, part of the European Agricultural Fund for Rural Development.

Cofion gorau

Mark Ward

Cofion gorau | Kind regards

Mark

Project Officer

Project Comin Cyweithredol | Common Collaboration Project
Gelligaer and Merthyr Common



COMIN
GELLIGAER
& MERTHYR
COMMON



Cronfa Amaethyddol Ewrop ar
gyfer Datblygu Gwledig
Ewrop yn buddsoddi mewn Ardaloedd Gwledig
European Agricultural Fund for
Rural Development
Europe Investing in Rural Areas



Llywodraeth Cymru
Welsh Government



COMIN
GELLIGAER
& MERTHYR
COMMON

Gelligaer & Merthyr Commoners Association

R.W.E Renewables UK
Baglan Bay Innovation Centre,
Baglan Bay Energy Park,
Port Talbot,
SA12 7AX,

26th April 2023

Dear Sirs,

Proposed Development at Pen March Wind Farm
(PEDWR Ref No: DNS/3253147)

This proposed development is planned on a section of the Gelligaer and Merthyr Common or CL 38, which is North of the A465 Heads of the Valleys Trunk Road. As a result, the active commoners who graze this section of the common will be directly affected by the proposals both during the construction period and for the full period, that the wind farm remains operational.

The Gelligaer and Merthyr Commoners association are grateful for the pre – planning submission liaison which has taken place with representatives of R.W.E Renewables, and for the information provided. The proposals have been fully discussed at several committee meetings of the Association, and at the latest meeting it was proposed and agreed by the committee that a formal letter of objection be submitted.

The basis of our objection is the problems which the development will cause to graziers not just during the initial commissioning stage, but more particularly after the turbines are up and running leading to permanent concerns and issues.

It is accepted that during the commissioning stage, measures will be put in place to minimise these problems, but later, all these issues will fall at the door of the commoners and the Association. We will be responsible for taking measures to mitigate and resolve any matters which arise. The exchange land merely replaces grazing land lost and has no bearing on the financial consequences which the association will incur in dealing with ongoing issues.

SE ALBANS LIANARTH RD, PONTLLANFRAITH, BLACKWOOD
Secretary: Glyn Davies. ~~40 Rhys Road, Blackwood, Cardiff CB1. NP12 3QR~~ NP12 2.

Mobile: 07974 813394
commoners@gmx.co.uk



COMIN
GELLIGAER
& MERTHYR
COMMON

Gelligaer & Merthyr Commoners Association

For Ease of reference the points raised by members are itemised below.

1. The new access road will create an easy point of access to this section of the common. This, together with the interest that the wind turbines will generate, will lead to an increase usage of the common by the public.

This will inevitably result in more livestock worrying, disturbance of grazing animals by visitors and traffic to the turbines, plus a greater risk of wildfires being started causing significant environmental damage.

2. The new access gates will be used regularly for maintenance of the turbines, and therefore there will be an increased danger of the gates being left open, enabling stock to stray.

3. The turbines are sited on the grazing areas for several commoners, and this will unsettle stock and hinder gathering. This problem will persist throughout the period the turbines are in operation.

4. Our members at Twyn yr Arian Farm have raised the particular point of the turbines causing them security concerns. They are afraid that increased traffic and visitors to the area will give rise to vehicles blocking their access, gates being left open, and loss of privacy. They believe that 'once RWE has finished work and left the area, they will be left with the headache of it.'

The Association is eager to resolve these long term concerns of our members and look forward to working with RWE to find a suitable solution.

Yours sincerely,

Secretary: Glyn Davies. ~~40 Rhys Road, Blackwood, Caerphilly CBC, NP12 3GR~~

Mobile: 07974 813394
commoners@gmx.co.uk

Daniel Patterson

From: Eleanor Nash <Eleanor.Nash@bristolairport.com>
Sent: 02 November 2022 16:52
To: Bennet Rees, Sophie; Pen March Project
Subject: [EXT] Porposed Pen March Windfarm - Bristol Airport

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Dear Jenny/Sophie,

Thank you for contacting Bristol Airport in respect of the consultation period for the proposed Pen March Windfarm. I have had a look through the website but I'm struggling to see a couple of key details which I need in order to review the proposal.

Please can you confirm the following information for me, so that I can request our Air Navigation Service Provider (NATS) to complete a technical assessment of the proposal.

For each turbine I require the proposed Eastings and Northings, and also the information below:

Proposal Details	
Approximate Site Ground Level (m):	
Hub/unit height:	
Rotor Diameter	
No. of units	6
Any Additional details relevant to proposal:	

As soon as I have this I will process the application for you.

Kind regards

Ellie

Eleanor Nash
Airside Operations Co-ordinator
Bristol Airport
Bristol
BS48 3DW
0117 457 5090
07717 896319
www.bristolairport.co.uk





**PARC CENEDLAETHOL BANNAU BRYCHEINIOG
BRECON BEACONS NATIONAL PARK**

Jenny Cowley - Development Project Manager
RWE Renewables GmbH
Baglan Bay Innovation Centre
Central Avenue
Baglan Energy Park
Port Talbot
SA12 7AX

Date: 15 December 2022
Officer: Davina Powell
Your Ref:
Our Ref: 22/21530/SPACON

Dear Sir/Madam,

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Proposal: "Formal notice of DNS consultation - construction and operation of a wind farm, battery energy storage systems and associated infrastructure"

Address: Pen March Wind Farm, Gelligaer And Merthyr Common,

Thank you for your consultation received 2 November 2022 regarding the above. We note prior to this consultation we have on record an email in September 2022 querying projects to include in the cumulative EIA chapter. We do not have any other record of the planning department being consulted on this project beyond the above.

We understand RWE Renewables UK Swindon Ltd intends to submit a 36MW windfarm Development of National Significance (DNS) planning application to Welsh Ministers for the development of Pen March Wind Farm at Gelligaer and Merthyr Common.

The Brecon Beacons National Park Authority (BBNPA) has undertaken some email dialogue with the Boundary Commission and *it would appear* that the red outline for this proposal is located partly in Merthyr Tydfil, Caerphilly and Powys Local Planning Authority areas but immediately abuts the boundary to the BBNPA. The draft submission states the majority of the site is on registered Common Land and the planning 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.

The nearest wind turbine (no. 2) appears to be approximately 170m away from the BBNPA boundary and the access track is around 30m away from the BBNPA boundary.

It is noted that this development is one of number of similar requests being considered by the PEDW and other bodies in the wider vicinity. The Authority is aware of the following:

- Land between Abertillery and Abersychan DNS no. 3278009
- Land at Mynydd Llanhilleth Common, Abertillery/Llanhilleth DNS Ref: 3273368
- Land at Penpergwn, Monmouthshire DNS 3252305;
- Land at Manmoel Common, Manmoel Road, Near Ebbw Vale DNS Ref: 3239181
- Mynydd Maen Wind Farm Newbridge/Cwmbran DNS 3276725
- Penpergwm Solar Farm, Monmouthshire DNS 3252305
- Twyn Hywel Wind Farm, Caerphilly DNS 3272053
- Mynydd Carn-y-Cefn Wind Farm, land west of Abertillery DNS 3270299

We are also aware of a live planning application currently being considered in relation to an extension to Trefil Quarry (determining Local Planning Authority – Blaenau Gwent Council). As well as other applications such as the Circuit of Wales approval and CiNER Glass factory application at Rassau Industrial Estate.

We set out below our understanding of the proposal and some background on the BBNPA's policy and legal context. The letter ends with our comments on the draft planning application submission available on the designated website. We do not offer any comment on the Common Land application.

Our understanding of the proposal

The draft submission states that the main proposed elements are for the following:

- Up to 6 three bladed horizontal axis wind turbines up to 180m to blade tip height. Each turbine has an internal transformer and aviation lighting.
- Wind turbine foundations and hardstanding
- An electrical and control building compound with battery storage facilities
- New site access off the Common Road and bell mouth junction
- On site access tracks, passing places and turning heads
- 2 gas pipeline crossings and 2 watercourse crossings
- Underground cabling
- Temporary construction and storage compound
- Off-site works to enable movement of abnormal loads during construction (such as the creation of a new slip track from A465)
- Habitat Management Area

The submission states that the scheme will be operational for 35 years from the date of commissioning and then at the end of this period a decision is made to whether to refurbish, remove or replace the turbines. If refurbishment or replacement were to be chosen relevant planning applications will be made.

It is anticipated construction will commence in 2025.

Background

Policy and legal context

Section 63 of the Environment Act (1995) sets out the statutory purposes of the National Park as follows:-

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park

In accordance with section 62(2) of the Environment, any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. Relevant Authorities include public bodies, government departments, local authorities and statutory undertakers.

The Special Qualities of the National Park may be significantly impacted by development proposals on the fringes of the National Park. The *current*¹ Brecon Beacons National Park Management Plan 2015-2020 defines the Special Qualities of the Brecon Beacons National Park as follows:

- (SQ1) A National Park offering **peace and tranquility** with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal.
- (SQ2) A feeling of **vitality and healthfulness** that comes from enjoying the Park's fresh air, clean water, rural setting, open land and locally produced foods.
- (SQ3) A **sense of place and cultural identity** - "Welshness" - characterised by the use of the indigenous Welsh language, religious and spiritual connections, unique customs and events, traditional foods and crafts, relatively unspoilt historic towns, villages and family farms. The continued practices of traditional skills developed by local inhabitants to live and earn a living here, such as common land practices and grazing.
- (SQ4) A **sense of discovery** where people are able to explore the Park's hidden secrets and stories such as genealogical histories, prehistoric ritual sites, medieval rural settlements, early industrial sites, local myths, legends and geological treasures.
- (SQ5) The Park's **sweeping grandeur and outstanding natural beauty** observed across a variety of harmoniously connected landscapes, including marvellous gorges and waterfalls, classic karst geology with caves and sink holes, contrasting glacial landforms such as cliffs and broad valleys carved from old red sandstone and prominent hilltops with extensive views in all directions.
- (SQ6) A **working, living "patchwork" of contrasting patterns, colours, and textures** comprising of well-maintained farmed landscapes, open uplands, lakes and meandering rivers punctuated by small-scale woodlands, country lanes, hedgerows, stone walls and scattered settlements.
- (SQ7) **Extensive and widespread access to the Park's diversity of wildlife and richness of semi-natural habitats**, such as native woodlands, heathland and grassland, natural lakes and riparian habitats, ancient hedgerows, limestone pavement and blanket bogs including those of international and national importance.
- (SQ8) In the context of the UK, **geographically rugged, remote and challenging landscapes**.
- (SQ9) **Enjoyable and accessible countryside** with extensive, widespread and varied opportunities to pursue walking, cycling, fishing, water-based activities and other forms of sustainable recreation or relaxation.
- (SQ10) **An intimate sense of community** where small, pastoral towns and villages are comparatively safe, friendly, welcoming and retain a spirit of cooperation

[bold our emphasis]

Planning Policy Wales (PPW) (Edition 11) states at para 6.3.5 -6.3.6 *"the statutory landscape designations that apply in Wales are National Parks, and AONBs. Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas. The designated landscapes should be drivers of the sustainable use and management of natural resources in their areas, and planning authorities should have regard to their identified special qualities in the exercise of their functions and any relevant management plans.*

In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities. Planning authorities should also seek to foster the social,

¹ Please note a new Management Plan 'Future Bannau' (2023-2028) is in advanced stages of drafting and is targeted for adoption in April 2023. Therefore, the BBNPA special qualities which PPW states should be given weight in the development management process may be subject to change pending the adoption of this new Plan.

economic and cultural well-being of their local communities”. PPW includes a footnote explaining the Sandford Principle as “where there is a conflict between these purposes, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage”.

PPW para 6.3.9 states “The special qualities of designated areas should be given weight in the development planning and the development management process. Proposals in National Parks and AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered”.

[Underlining our emphasis]

Draft Planning Application Submission Package

We have reviewed the draft submission – principally the draft Environmental Statement (ES). We note the scoping response from PEDW too – we have no record of being consulted at scoping stage.

We consider the key issues which have the potential to impact on the National Park Authority’s statutory purposes and special qualities are primarily in relation to landscape and visual impact, cultural heritage, tranquility and ecology. We make the following comments on the draft submission on these topic areas:

Landscape and Visual Impact Assessment (LVIA)

1. **Policy** – the ES generally needs to refer to relevant BBNPA Policy context – but particularly in the LVIA chapter. Please note para 3.16.2.10 of the LDP which states “*The impact of large scale Renewable Energy projects located on our peripheries will be judged in accordance with SP2 Major Development in the National Park.*”
1. **Study area of LVIA:** the 45km radii includes land which encompasses the entirety of the National Park. The 45km radii is considered broadly appropriate. We note 26km has been used for landscape character consideration.
2. **Dark Skies:** NRW at scoping stage highlighted the need for visualisations regarding lighting and the impact on the Dark Sky Reserves. We note 2 viewpoints within the BBNPA area – some of which are located within the Dark Skies Core - have been considered in the draft ES. ES Para 5.13.13 states: “*Significant effects are predicted for representative night time Viewpoint 18 Brecon Beacons Way (Craig Y Fan Ddu) as a result of the 2000cd scenario reducing to not significant for the 200cd scenario (in reality, it is extremely unlikely that 2,000cd will ever be experienced at its full intensity as it will only operate when visibility is reduced by climatic conditions). For the other representative viewpoints, the effect is assessed as not significant. The overall effect of the Proposed Scheme turbine lights on the Dark Sky Reserve is considered to be Not Significant. See also Technical Appendix 5.5, (Volume 4)*”. We are concerned with the potential this scheme has for significant effects at higher cd particularly given this lighting will appear much higher in the skyline than other surrounding features.
3. **Viewpoints:** Figure 5.11a Blade ZTV with viewpoints – shows an extensive area in the BBNPA area where at least 5-6 blade tips will be visible. Of the 26 LVIA viewpoints (9 are located within the BBNPA area) and of 7 wireframe only viewpoints (4 are located in BBNPA) – those which are within the BBNPA are listed below along with their assessed impacts as per the draft ES:
 - 5 - Pontsticill (Moderate /Minor and Not Significant Visual Effect)
 - 8 - Cefn yr Ystrad (Moderate-Major and Significant Visual Effect)
 - 15 - Garn Ddu (Moderate and Significant Visual Effect)
 - 18 - Brecon Beacons Way (Craig Y Fan Ddu) (Moderate and Significant Visual Effect)
 - 19 - B4560, Cefn Pwll-coch (Moderate-Minor and Not Significant Visual Effect)
 - 21 - A4059 22 - PRow (Bedwellty FP 28) (Moderate-Minor and Not Significant)
 - 24 - Pen y Fan (Moderate – Minor and Not Significant Visual Effect)

- 25 - Black Mountains, Pen Cerrig-calch (not assessed)
- 26 - Sugar Loaf (not assessed)
- A - Craig Fan Ddu, Cairn
- B - Mynydd Llangynidr
- E - Cadair Fawr
- G - Fan Fawr

Setting aside our thoughts on the outcome of the assessment of visual effects, dialogue has not been undertaken with BBNPA on these viewpoints (we note Pen Cerrig Calch has not been included in the viewpoints for example?) although we understand dialogue has been undertaken with NRW on these. Please note para 5.8.5 of the ES appears incorrect on this account.

4. **Visual effects:** The ES outlines that there would be significant visual effects extending approximately 8km within the BBNPA. Particularly BBNPA viewpoints 8, 15 and 18 appear to be most visually impacted on by the proposal. We consider the residual effects have been underestimated in parts, considering the heightened sensitivity of the area given its recreational and open access nature. We are therefore very concerned by the proposal's residual visual effects and its resultant impact on the BBNPA.
5. **Landscape effects:** The draft ES outlines no significant effects on the special qualities of the BBNPA, with the exception of an area approximately 3km at the southern edges of the BBNPA. Six Landscape Character Areas (LCAs) in the BBNPA are 'identified as having potential for significant effects and are included in a detailed assessment'. Based on table 5.39 of the LVIA chapter – the following BBNPA LCAs have been assessed as follows:
 - no. 7 (Central Beacons – moderate and not significant landscape effect),
 - 8 (Cefn yr Ystrad – minor and not significant effect),
 - 9 (Rhydney Common – moderate-major significant landscape effect and moderate and not significant)

The proposal is located in a corridor of land beyond the Heads of the Valley's Road which is contiguous with the National Park beyond. The proposal will introduce a major change into this area. We are very concerned with the landscape impact of the proposal and its resulting impact on the statutory purposes and special qualities of the BBNPA.

6. **Special Qualities Assessment:** We note Appendix 5.3 which considers the Special Qualities (SQs) of the National Park in the context of landscape and visual effects. We would however highlight that the proposal has the potential to impact on other ecological and cultural heritage SQs (SQ3, 4 and 7) which do not appear to have been specifically assessed in other parts of the ES.

We consider the assessment has underestimated the sensitivity of landscape character areas assessed and also underestimates the impact of the development on SQs in our opinion. We note moderate and significant effects to SQ 1 and 8 in LCA 9 within 3km are identified and are very concerned by this. It is not clear whether the assessment has been taken on impacts on SQ without consideration to matters like movement of blades which can have impacts on the SQs in their own right (and only appear to have been considered in the context of impact on residential properties).

7. **Cumulative:** the draft ES concludes no significant effects from cumulative effects. It states there is no consented wind energy developments in close proximity to the proposed scheme (ie within 20km). As highlighted above, there are a number of other DNS schemes through various stages of the consenting process and whilst these may be beyond the 20km distance could still have a cumulative impact which needs to be accounted for. We are concerned with the potential for a proliferation of such schemes on the fringes of the National Park should these be consented and note the cut-off point of February 2022 mentioned in the draft ES. We concur with NRW's comments that there are potential cumulative effects on landscape and visual matters can occur over a large radius. We are concerned with the cumulative impact which will result should these schemes be consented.

Cultural Heritage

The draft ES chapter does not appear to directly consider the impact the proposal may have on the statutory purpose and special qualities of the BBNPA which includes reference to cultural heritage. This is a key omission of this chapter which requires consideration.

Ecology

The ES states that the proposed scheme will result in the permanent loss of 10.12 hectares of habitats encompassed by a Site of Important for Nature Conservation (SINC) as well as a temporary loss of 16.1 hectares during construction. Compensation is proposed for the permanent loss of habitats through the restoration of 22.6 hectares of heathland habitat in the north-eastern part of the Site; this is detailed within a Habitat Management Plan. The northern boundary of the restoration area is an artificial straight line to coincide with county boundaries. It is stated that the applicant is also investigating the potential to provide compensation for the loss of underlying peat through a contribution to off-site peatland restoration.

The ES states that both curlew and snipe will experience a small loss of habitat but this is not considered likely to be significant. During the operation of the scheme, potentially significant displacement effects have been identified for curlew and snipe. These effects are considered significant at a regional level for curlew and at a county level for snipe. The applicant is investigating providing off-site compensation for the potential disturbance and displacement of breeding curlew during operation and additional biodiversity enhancements. Reference is made to the possibility of a contribution to curlew conservation measures within the Usk Catchment and Llangorse Lake Important Curlew Area.

It is stated that discussions regarding the off-site compensatory measures are ongoing between RWE and the BBNP Authority ecologists, but it must be noted that these discussions do not involve officers within the Authority's Development Management Team. Details of proposed off-site compensation and enhancement measures are therefore not included within the Outline Habitat Management Plan; once finalised, the compensatory proposals for peat loss and curlew/snipe displacement must be outlined within a robust and specific compensation and enhancement strategy, clearly outlining a mechanism to ensure delivery as well as post completion monitoring strategies. Enhancement proposals must also be clearly defined in addition to the compensatory requirements, as required under Section 6 of the Environment (Wales) Act 2016.

Conclusion

Based on the comments above, the BBNPA currently has very significant concerns that the proposal will have adverse impacts on one of the National Park's statutory purposes – namely *“to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park”*. The BBNPA also has very significant concern that the proposal will adversely impact on four of the Special Qualities of the Park –

- *“sweeping grandeur and outstanding natural beauty”,*
- *“a National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal”*
- *“working, living “patchwork” of contrasting patterns, colours, and textures”; and*
- *“In the context of the UK, geographically rugged, remote and challenging landscapes”.*

We are also concerned that due consideration has not been given to other Special Qualities relating to –

- *“A sense of discovery where people are able to explore the Park's hidden secrets and stories such as genealogical histories, prehistoric ritual sites, medieval rural settlements, early industrial sites, local myths, legends and geological treasures”.*
- *“Extensive and widespread access to the Park's diversity of wildlife and richness of semi-natural habitats, such as native woodlands, heathland and grassland, natural lakes and riparian habitats, ancient hedgerows, limestone pavement and blanket bogs including those of international and national importance”.*

We note that the proposal is outside of the defined pre-assessed areas for wind energy set out in Future Wales (2040) and Policy 17 (Renewable and Local Carbon Energy and Associated Infrastructure) sets out that *“Applications for largescale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities...”*. Currently we feel the proposal is incompatible with the above policy given its impacts on BBNPA.

Please note the above comments are given without prejudice to comments the BBNPA may make when the respective DNS application is submitted to the Welsh Ministers.

We trust the above comments are of assistance however if you wish to discuss any aspect further please do not hesitate to contact me.

Thank you for your consultation regarding the above.

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.

Daniel Patterson

From: Jackson, Jonathan <Jonathan.Jackson@nationalgrid.com>
Sent: 09 December 2022 09:46
To: Pen March Project
Subject: [EXT] RE: [EXTERNAL] FW: Proposed Pen March Wind Farm - Notice of Statutory Consultation
Attachments: EXT || Pen March

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Morning Jenny,

Hope you're well?

Many thanks for sending over the Notice of Statutory Consultation, much appreciated. Apologies for not getting back to you sooner.

In terms of providing a response, we're happy for the project to continue as planned on the basis that the advice provided in a previous discussion with yourself and Victoria (see attached) is still adhered to. We're happy to continue discussions going forward towards Detailed Design so we can get the crossing points agreed and any legal paperwork underway.

Kind Regards,

Jonathan Jackson

Assistant Engineer - Pipelines
Gas Transmission & Metering

nationalgrid

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Warwick Technology Park,
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Working hours: 07:30 – 15:30

Annual Leave: 8th December (PM), 1st – 6th February '23.

Please consider the environment before printing this email.

From: sophie.bennetrees@rwe.com <sophie.bennetrees@rwe.com> **On Behalf Of** penmarch@rwe.com
Sent: 02 November 2022 14:41
To: Jackson, Jonathan <Jonathan.Jackson@nationalgrid.com>
Subject: [EXTERNAL] FW: Proposed Pen March Wind Farm - Notice of Statutory Consultation

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish' button.

Dear Jonathan,

This email was sent to Jayne White but has been returned. Are you able to ensure it gets to the relevant person please?

Please contact me with any questions.

Kind regards,
Jenny

From: Bennet Rees, Sophie **On Behalf Of** Pen March Project
Sent: 02 November 2022 14:39
To: 'assetprotection@nationalgrid.com' <assetprotection@nationalgrid.com>; 'jayne.white@nationalgrid.com' <jayne.white@nationalgrid.com>
Subject: Proposed Pen March Wind Farm - Notice of Statutory Consultation

Dear National Grid (Gas Transmission, Asset Protection),

I write to notify you of the statutory, pre-application consultation period for the proposed Pen March Wind Farm. Consultation will run for 6 weeks from Thursday 3rd November to Thursday 15th December.

You have been identified as a potential interested party who may wish to respond to this consultation. Please see the attached for a formal covering letter and notice.

Please contact me with any queries.

Regards,

Jenny Cowley
RWE Renewables GmbH
Renewables Europe & Australia
Development Project Manager – Pen March Wind Farm
Baglan Bay Innovation Centre, Central Avenue, Baglan Energy Park, Port Talbot, SA12 7AX

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Registered Office:

RWE Renewables UK Swindon Limited: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB.

Registered in England and Wales no. 2550622

RWE Renewables UK Limited: Greenwood House, Westwood Way, Westwood Business Park, Coventry, United Kingdom CV4 8PB. Registered in England and Wales no. 03758404

RWE Renewables Management UK Limited: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB.
Registered in England and Wales no. 12087808

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Daniel Patterson

From: Hugh Craddock <hughcraddock@oss.org.uk>
Sent: 12 December 2022 15:32
To: Pen March Project
Subject: [EXT] Pen March Wind Farm: common land

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Dear Ms Cowley

The society is responding to RWE's consultation in respect of Pen March Wind Farm, as regards the use of common land.

1. It is not encouraging that the common land report was prepared by a consultant who does not appear to understand the common land registers. At para.9.3, it is stated that:

In order to gain more knowledge of the actual active usage of grazing rights over the whole of the Common, the Applicant sent letters to all the registered commoners at the addresses recorded on the Register.

It then is observed (para.9.4):

Few replies were received with many letters returned unopened as the postal address was out of date.

At para.5.12, it is stated:

Common Land Registers are not automatically kept updated as agricultural land and holdings with attached rights change hands.

2. This is how the registers work. A registered right of common is recorded as being attached to land (as specified in col.5 of the rights section of the register), and the owner or occupier of that land is entitled to exercise the right. The person specified as applicant for provisional registration of the right recorded in col.3 of the register (often arising from an application made more than half a century ago) is a record only of historical interest. In short, if RWE wishes to know who is entitled to any recorded right, it must ascertain the ownership of the land to which the right is attached — the owner of that land is the right holder or commoner. It hardly is surprising if letters sent to individuals living at addresses active more than 50 years ago were returned undelivered. RWE should try harder. The claimed consultation with commoners was deeply flawed.

3. We understand the desirability of commissioning new sustainable sources of electricity through wind and solar generation. But, where such projects are justified in the wider and local context, we expect any proposal affecting common land also to generate a fair deal both for commoners and for the public. This proposal fails on both counts.

4. The replacement land is indistinguishable from the registered common land: it is undivided by any physical feature (such as a fence or bank), and the land itself is of the same character. It is designated as open country for the purposes of the right of access conferred by Part I of the Countryside and Rights of Way Act 2000. From the perspective of public access, the replacement land will offer nothing new, save a greater protection from inappropriate works under s.38 of the Commons Act 2006.

5. The replacement land already is grazed by commoners' livestock. It may well be that graziers have acquired rights of common over the replacement land by prescription, a possibility which is not addressed in the common land report: if so, the conferment on commoners of 'new' rights over the replacement land will add nothing to what the commoners already have. Even if such rights have not been acquired, it seems the commoners long have had access to this *de facto* grazing. If the Welsh Ministers were asked to grant an application in which the compensatory land is already available *de jure* to the commoners, there would be a potential question of uncompensated loss of property rights for the purposes of protocol 1, art.1, of the

European Convention of Human Rights. It is not clear that the compensation scheme envisaged by para.7.61–7.62 of the common land report is intended to function in this context. And as the scheme would be secured by a s.106 agreement, it is not clear that the Welsh Ministers could take account of that agreement.

6. In short, the replacement land is not a fair or adequate substitute for the loss of the release land to the public and commoners.

7. It is noted that there is a:

proposal to include an area of approximately 22.60 hectares of Heathland Habitat Restoration Improvement and Management close to the North Eastern boundary the Common,

But this is said to be part of the planning application, and we suggest it is double counting to include it as a redeeming feature of any s.16 application.

8. We welcome the proposal to regrant rights of common over parts of the release land which are no longer required for works following the construction period, but suggest there should be a similar binding commitment in respect of the whole of the release land when the development is commissioned.

9. We look forward to seeing revised proposals in due course which take account of our comments.

regards

Hugh

*Hugh Craddock
Case Officer
Open Spaces Society
25a Bell Street
Henley-on-Thames
RG9 2BA
Email: hugh@oss.org.uk
www.oss.org.uk*

*Tel: 01491 573535
Please note that I work Monday, and Tuesday to Thursday mornings, only
(Registered in England and Wales, limited company number 7846516
Registered charity number 1144840)*

Support our Grant a Green Appeal

*and help fund our campaign to protect open space
through voluntary registration as town or village green*



The Open Spaces Society has staff with exhaustive experience in handling matters related to our charitable purposes. While every endeavour has been made to give our considered opinion, the law in these matters is complex and subject to differing interpretations. Such opinion is offered to help members, but does not constitute formal legal advice. Please obtain our permission before sharing, reproducing or publishing any opinion.

Daniel Patterson

From: Bob Macey <bobmacey@hotmail.com>
Sent: 13 December 2022 15:31
To: Pen March Project
Cc: CyR Carol Franks
Subject: [EXT] Proposed Pen March Wind Farm

[EXTERNAL EMAIL **]:** This email originated from outside of the organization - be CAUTIOUS, particularly with links and attachments.

Thank you for informing Caerphilly Ramblers of your proposed Pen March wind farm development . Your proposal has been considered by our Committee and this is our response on behalf of the Club

As background Caerphilly Ramblers was established in 1993 and has some 150 members with an active walking programme. This includes walks in and around your proposed development. Further information can be found on our website.

Caerphilly Ramblers recognise that within Wales it is government policy to encourage onshore windfarm development in appropriate areas, subject to the assessment of the impact of the specific proposal. The Club also recognises the role windfarms can play in reducing the impact of energy generation on climate change.

Nevertheless the proposed development is seen as likely to:

- Have a significant adverse impact on an attractive landscape.*
- Increase noise, reducing the quiet enjoyment of the countryside.*
- Directly limit access to the countryside.*

These impacts reduce materially the amenity value of the area to those, such as rambling groups, who look to enjoy the local countryside. These adverse impacts will arise during the construction, operation and decommissioning stages and it is crucial that appropriate mitigation and compensation measures are brought forward by the applicant for each of these stages, and become enforceable requirements if approval is given.

Given these unwelcome impacts Caerphilly Ramblers would wish to see the following issues addressed in your application and identified as requirements should approval be given for your development:

- 1. There should be adequate mitigation measures provided for any loss of access, with clear signposting of any alternative routes.*
- 2. This should be required during the construction, operation and decommissioning stages.*
- 3. There should be compensatory measures to help offset the general loss of amenity, notably landscape and solitude, to those such as rambling groups seeking to enjoy the countryside. Such measures can include the provision of additional access routes and picnic areas.*
- 4. There is a need for requirements to ensure that these mitigation and compensatory measures are adequately maintained throughout the lifetime of the project.*

We look to you, as the Applicant, to address these issues in your application following the consultation.

Could you please acknowledge receipt of this response.

Thank you again for giving us the opportunity to comment.

*R D Macey
Chair,
Caerphilly Ramblers*

**Safety and Airspace Regulation Group
Safety and Business Delivery**



Jenny Cowley
Development Project Manager
Pen March Wind Farm.
RWE Renewables UK Swindon Limited
Baglan Bay Innovation Centre
Central Avenue, Baglan Energy Park
Port Talbot
SA12 7AX

20 December 2022
Ref Windfarms/ Pen March

Dear Ms Cowley,

Reference: Notice of Statutory Consultation regarding Proposed Pen March Wind Farm – e-mail dated 31 October 2022.

Thank you for your correspondence at reference and apologies that our response falls outside of the formal consultation period. I hope that our response can be taken into account as part of the project development.

The proposed Pen March Wind Farm wind farm consists of 6 turbines. The turbines will have tip heights of 180 metres above ground level (AGL), which brings them within scope of the Air Navigation Order (2016) Article 222.

The Air Navigation Order article 222 requires that all obstructions at a height of 150 m or more above ground are fitted with medium intensity steady red lights positioned as close as possible to the top of the obstacle and at intermediate levels spaced so far as practicable equally between the top lights and ground level with an interval of not more than 52 metres.

CAA Policy Statement, dated 1 June 2017, covers the Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150m Above Ground Level. Under Articles 222 (5) and (6), the CAA set out requirements for all UK land based wind turbine generators which have a maximum blade tip height at or above 150m AGL.

- a. The person in charge of the wind turbine generator must ensure that it is fitted with a medium intensity (2000 candela) red light positioned as close as practicable

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to the top of the fixed structure. A second light serving as an alternative should be provided in case of failure of the operating light.

b. The lights required by paragraph (a) must be so fitted to show when displayed in all directions without interruption.

c. Additionally, at least three (to provide 360 degree coverage) low-intensity Type B lights (32 candela) lights should be provided at an intermediate level of half the nacelle height.

d. Subject to sub-paragraphs (e) and (f), the person in charge of a wind turbine generator must ensure that any light required to be fitted by this article is displayed.

e. Lights should be operated by an acceptable control device (e.g., photocell, timer, etc.) adjusted so the lights will be turned on whenever illuminance reaching a vertical surface falls below 500 LUX. The control device should turn the lights off when the illuminance rises to a level of 500 LUX or more.

f. In the event of the failure of any light which is required by this policy statement to be displayed, the person in charge of a wind turbine generator must repair or replace the light as soon as practicable.

g. If the horizontal meteorological visibility in all directions from every wind turbine generator in a group is more than 5 km, the intensity for the light positioned as close as practicable to the top of the fixed structure required to be fitted to any generator in the windfarm and displayed may be reduced to not less than 10% of the minimum peak intensity specified for a light of this type.

Article 225A of the Air Navigation Order (2016) is also relevant relating to notifying the CAA of a change to aviation obstacles if it or they are 100 metres or more above ground level. See Appendix A for full text.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AWells', written in a cursive style.

Andy Wells, Manager Rulemaking and Safety Publications

Appendix A

Article 225A.— Notifications relating to en-route obstacles

(1) In respect of an existing en-route obstacle, the relevant person must, as soon as reasonably practicable, notify the CAA in writing of—

- (a) the obstacle's type;
- (b) the obstacle's position, represented by geographical coordinates in degrees, minutes and seconds;
- (c) the obstacle's elevation above mean sea level and height above ground level to the nearest metre or foot; and
- (d) the type and colour of any obstacle lighting.

(2) Paragraph (1) does not apply where the CAA has already been notified.

(3) In respect of planned works which have a confirmed commencement date, the relevant person must notify the CAA in writing of the information specified in paragraph (4) in accordance with paragraph (5).

(4) The information referred to in paragraph (3) is—

- (a) the obstacle's type, or planned type;
- (b) the obstacle's position, represented by geographical coordinates in degrees, minutes and seconds;
- (c) the obstacle's elevation above mean sea level and height above ground level to the nearest metre or foot prior to and upon completion of the necessary works;
- (d) the type and colour of any lighting to be fitted to it, or to be removed from it; and (e) the scheduled dates of commencement and completion of the works.

(5) Notice under paragraph (3) must be given—

- (a) at least 8 weeks before the commencement of the planned works; or
- (b) as soon as reasonably practicable where there is insufficient time to give 8 weeks' notice or there is an urgent need to commence the planned works.

(6) The relevant person must notify the CAA in writing of the completion of the planned works and whether there has been any change to the information provided under paragraph (4) no later than 30 days after the completion of the works.

(7) In this article— 4 “en-route obstacle” means any building, structure or erection, the height of which is 100 metres or more above ground level; “planned works” means works to—

- (a) erect a new en-route obstacle;
- (b) increase the height of an existing en-route obstacle;
- (c) decrease the height of an existing en-route obstacle;
- (d) develop an existing building, structure or erection into an en-route obstacle;
- (e) remove an existing en-route obstacle;
- (f) fit obstacle lighting to an en-route obstacle; or
- (g) remove previously fitted obstacle lighting from an en-route obstacle;

“relevant person” means—

- (a) in relation to paragraph (1), the person in charge of an existing en-route obstacle;

(b) in relation to paragraphs (3) and (6), the person in charge of the planned works which would, on completion of those works, result in the creation, modification or removal of an en-route obstacle.”

Further information is available at:

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Obstacle-notification/Obstacle-notification/>

APPENDIX I

APPLICANTS RESPONSE TO NATURAL
RESOURCES WALES'S CONSULTATION
RESPONSE RELATING TO LANDSCAPE AND
VISUAL CONSIDERATIONS

Pen March Wind Farm

DNS ref: DNS/3253147

Landscape and Visual Response to the Natural Resources Wales (NRW) Consultation Response

Introduction

This report provides the Applicant's response to the NRW consultation response dated 21/12/22, which sets out its comments on landscape and visual matters relating to the Pen March Wind Farm (the Proposed Scheme).

It represents the view of the Applicant, RWE and has been prepared by Optimised Environments Ltd (OPEN), the appointed landscape advisors on the project team and authors of the landscape and visual impact assessment (LVIA). We have set out this response to assist in clarifying aspects of NRW's comments regarding the landscape and visual impacts of the Proposed Scheme.

Our response to NRW's comments is set out in **Table 1**. For ease of reference, we have structured our response in line with the main issues raised by NRW. We have reproduced text from NRW's letter in the left-hand column and provided our response to points raised in the right-hand column.

Table 1: Consultee comments and response

NRW Comment	Applicant Response
<i>Landscape and Visual Amenity'</i> <i>'Our advice on landscape and visual amenity relates to the potential impacts on the [Bannau Brycheiniog] National Park (BBNP). We consider the proposal would result in significant adverse effects on the BBNP and conflicts with the statutory purpose to conserve and enhance natural beauty, as set out in Planning Policy Wales, Edition 11.</i> <i>The proposal does not lie within a Pre-assessed Area for Wind Energy as defined in the National Development Framework, Future Wales: The National Plan 2040, and lies within the immediate setting of the BBNP.</i> <i>In our response to the EIA Scoping consultation, our letter reference CAS-115523-M7J0, dated 03/07/2020, we advised 'We anticipate at this location, a proposal of this scale and nature would result in significant adverse effects on the National Park and we do not believe that it could comply with policy...However, progression of the proposal is a matter for the Applicants' consideration...'</i> <i>Our EIA Scoping advice has been included within the Landscape and Visual Impact Assessment (LVIA) by Optimised Environments Limited (OPEN), contained within Chapter 5 of the Draft Environmental Statement (Volume 2) (Draft ES) prepared by RSK, dated 03/11/2022.'</i>	The LVIA identifies significant effects on the BBNP but concludes that these are localised to an area of around 3km at the southern edges of the BBNP. The Statutory Purpose for designation of National Parks is set out as follows: • The National Parks and Access to the Countryside Act 1949 provided the framework for the establishment of National Parks and AONBs and sets out their purpose of conserving and enhancing natural beauty, wildlife and cultural heritage of National Parks and of promoting opportunities for the understanding and enjoyment of the special qualities of those Parks by the public. • The Environment Act 1995 Sets out the duty of certain bodies to have regard to the purposes for which National Parks are designated (to preserve and enhance the natural beauty of the Park areas and for the purpose of promoting their enjoyment by the public) that they shall seek to foster the economic and social well-being of local communities within the National Park by cooperating with local authorities. <i>'If it appears there is a conflict between those purposes then the relevant authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area of the National Park.'</i> These purposes are reflected in Planning Policy Wales, Edition 11, which states in para 6.3.3 – <i>'In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities. (The Sandford Principle provides that, where there is a conflict between these purposes, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage).'</i> The Proposed Scheme is not within the BBNP and in line with BBNPA SP9 which states that the 'impact of large scale Renewable Energy projects located on our peripheries will be judged in accordance with SP2 Major Development in the National Park' and BBNPA SP2 which requires an assessment of 'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which these could be moderated', the LVIA has assessed the effects on the BBNP and its special qualities in detail.

NRW Comment	Applicant Response
	Specifically relating to the Bannau Brycheiniog National Park, the Landscape and Development Supplementary Planning Guidance, BBNPA 2014 also states - <i>'The National Park Authority seeks to ensure a sustainable future for our communities and this special landscape by seeking to manage the scale of landscape change posed by development. We do this by expecting the highest standards of design from all new development, including careful consideration of siting and position within the landscape. Through this level of scrutiny, the Authority is able to ensure that no development occurs which could compromise the integrity of the area's natural beauty.'</i> A key question, therefore, in terms of the Statutory Purpose of the BBNP is - could the Proposed Scheme 'compromise the integrity' of the BBNP and its Special Qualities such that it could no longer be considered to meet the objectives of a National Park? In considering this question within the context of the assessment in Appendix 5.3, the 'integrity' of the BBNP is considered to be a measure of the degree to which its Special Qualities continue to define the area. Appendix 5.3 para 5.7.3 summarises the limited level of effect on the affected BBNP SQs within the core area of the BBNP as due to the following moderating factors – <i>'the separation between the Proposed Scheme and the area in which the SQ would be experienced; the underlying broad upland context of the upland of the site and surrounding area of moorland at the edges of and to the south of the BBNP which is considered to be a suitable receiving landscape for the Proposed Scheme; and the extensive presence of operational wind energy development in views south and west from the BBNP which provides an underlying wind energy context for the Proposed Scheme which would not be viewed as entirely uncharacteristic as a result. The sense of remoteness and tranquillity will not be lost and the pattern and diversity of the landscape will remain intact.'</i> The Special Qualities for the majority of other BBNP areas to the east and west of the core area would be relatively unaffected and significant effects have been assessed as limited to BBNP LCA 9 within a localised area of around 3km. It is acknowledged that there would be some localised significant adverse effects to BBNP SQs within BBNP LCA 9 and that in this respect only the Proposed Scheme would not be consistent with objectives that seek to enhance the natural beauty or quality of the National Park. However, it is also the case that almost no large-scale development would be able to fully comply with the principle of enhancement and therefore it must be anticipated that any wind energy development would give rise to some degree of friction with such an aim. The Welsh Government has identified Pre-assessed Areas for Wind Energy (PAWE). Future Wales, The National Plan 2040, identifies 10 such areas, 4 of which are found around the periphery of the BBNP - PAWE 5 and 8 are to the north and west of the BBNP at approximately 2.7km and 4.9km respectively, PAWE 9 and 10 are to the south of the BBNP at approximately 1.7km and 3km respectively.

NRW Comment	Applicant Response
	Policy 17 of Future Wales states that – <i>‘In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18.’</i> This suggests there is a recognition that whilst there will be change to the current landscape baseline within close context to the BBNP through development progressed at its periphery, that this change will generally be considered acceptable. Policy 18 of Future Wales states that Developments of National Significance will be permitted subject to policy 17 and <i>‘outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)’</i> Appendix 5.3 considers that there may be some perceived diminishment of the Special Qualities of ‘SQ1 peace and tranquillity’ and ‘SQ5 sweeping grandeur and outstanding natural beauty’ but such effects are not considered to be significant for the majority of the BBNP, including within its core area in the Central Beacons and where effects on SQs are significant these are localised to an area of broad upland at the southern edges of the BBNP. It is therefore considered that whilst the Proposed Scheme is at a closer proximity to the BBNP than the Pre-Assessed areas, the SQs would not be diminished to such a degree by the Proposed Scheme that it would affect the overall integrity of the BBNP or its inherent natural beauty and it would occur within a context and understanding of the need for change including accommodating alternative energy, such as within the nearby Pre-Assessed areas.
<i>‘The LVIA provides an assessment of the effects on the special qualities of three of the BBNP’s Landscape Character Areas (LCA7, 8 and 9). It assesses nine viewpoints (VP) within the BBNP, including cumulative effects, plus night-time effects from viewpoints.’</i>	Whilst this statement is not incorrect it is important to note that – <i>‘while LVIA Viewpoints within the BBNP provide a useful illustration of the views that can be gained, the assessment of visual effects on viewpoints and on special qualities is carried out separately and according to specific methodologies that vary in some respects. The assessment of visual effects at viewpoints should therefore not be considered to entirely represent the assessment of effects on special qualities, and the viewpoints have been referenced simply to provide an illustration of views within the BBNP’,</i> (para 5.6.9 of Appendix 5.3).

NRW Comment	Applicant Response
<i>'Of the viewpoints outside the National Park, several include wide expanses of the BBNP seen in juxtaposition with the proposed development.'</i>	Many of the viewpoints do not have a view towards the Central Beacons and would certainly not consider that views from the south of BBNP to have views that include <i>'wide expanses of the BBNP seen in juxtaposition with the proposed development'</i>. Appendix 5.3 Table 5.2: BBNP LCA7 – Central beacons states that - <i>'In terms of views towards the Central Beacons from surrounding areas the LVIA has assessed a large number of viewpoints that have views towards the BBNP, particularly from the valleys landscape to the south. The LVIA has found that whilst there may be views of the towards the Proposed Scheme within the context of the southern edges of the BBNP and its broad upland plateau landscape character, views of the Central Beacons are either not experienced in these views due to the intervening upland of southern BBNP or are in a different part of the panorama than the Proposed Scheme. On balance therefore the view of the Central Beacons would not be interrupted from the vast majority of receptors outwith the BBNP area.'</i>
<i>'The LVIA concludes there would be significant effects on:</i> <i>• Special qualities of peace, tranquillity, and remoteness on the localised area of LCA9: Mynyddoed Llangatwg and Llangynidr, within 3km of the site;</i> <i>• VP8 - Cefn y Ystrad - 2.7km north of the site. For recreational users all turbines would be visible, with a backdrop of the ridges between the Valleys, and the blades seen against the sky. From this viewpoint much of the development within the Heads of the Valleys corridor and the valley is hidden by the landform;</i> <i>• VP15 - Garn Ddu, north of Merthyr Tydfil, at 5.2km distance. For recreational users all turbine hubs and blades would be visible against the skyline, and therefore all lights seen at night-time;</i>	For the avoidance of doubt, it should be noted that NRW's description of significant effects is not an extract from the LVIA and does not necessarily correlate with the reasoning for the significant effect as reported in the LVIA, which for clarity have been summarised below – • For LCA 9, two, not three, of the Special Qualities (SQ) are found to have significant effects - SQ1 which relates to peace and tranquillity and SQ8 which relates to remoteness (Appendix 5.5 Table 5.4: BBNP LCA – Mynyddoed Llangatwg and Llangynidr). • VP8. The principal reason for the significant visual effect is the close proximity and whilst located within the BBNP, Table 5.24: Viewpoint – 9 Cefn yr Ystrad in the LVIA highlights that <i>'the scenic views to the north across the BBNP and to the south along the Rhymney Valley would be unaffected by the Proposed Scheme;</i>' which is a moderating factor that relates to the views from this location across the wider BBNP. The Proposed Scheme would be clearly located on an area of broad upland moorland and whilst we agree with NRW that the Heads of the Valley corridor is not visible immediately behind the location of the Proposed Scheme turbines, other parts of the Heads of The Valley landscape are visible to the southeast (see Figure 5.31b). The view also contains a widespread backdrop of operational turbines beyond the intervening horizon created by the upland, including the single turbines and clusters to the south and the wind farms to the southwest. • VP15. The effect is assessed to be at a moderate level and found to be significant due to its location within the BBNP and higher sensitivity. Table 5.30: Viewpoint – 15 Garn Ddu in the LVIA highlights that - <i>'The effect is of borderline significance due to the cumulative context of the view and the site area appearing as a broad and large scale upland landscape which forms a suitable receiving landscape for the Proposed Scheme.'</i>

NRW Comment	Applicant Response
VP18 – <i>[Bannau Brycheiniog] Way at Craig y Fan Ddu, at 7.8km distance. All blades and hubs would be seen above the skyline, and therefore all the lights visible at night-time. All the other development along the Heads of the Valleys corridor, including other local turbines, are hidden from this viewpoint, thereby increasing the magnitude of change.</i> <i>The LVIA concludes that at greater distances (e.g. VP24 - Pen-y-Fan at 12km) and where the receptors are road-users (e.g. VP21 - A4059 at 10.4km, and VP19 - B4560 at 8.3km), the effects would not be significant, although from these viewpoints all the turbines would be visible.</i> <i>Whilst we agree there would be significant adverse effects on these landscape and visual receptors, we consider the significant effects on the special qualities of the BBNP are likely to extend beyond 3km, as far as 12km (Pen-y-Fan) to the north and approximately 10km (Mynydd Llangatwg) to the east, and 6km (Garn Ddu) to the west.'</i>	- VP15 was not one of the representative lighting assessment viewpoints and lighting was not a reason for it being assessed as a borderline significant effect. The viewpoint is in a location which is remote and on an exposed moorland ridge, and it is considered that there would be few if any visual receptors on this hill during the hours of darkness. - VP18. The effect is assessed to be significant at a moderate level and Table 5.33: Viewpoint – 18 Bannau Brycheiniog Way (Craig Y Fan Ddu) in the LVIA states that - <i>'The effect is borderline significant and whilst the underlying broad upland context of the receiving landscape is a moderating factor, the Proposed Scheme is close enough for a significant effect to occur to this High sensitivity receptor within the BBNP.'</i> Appendix 5.5 assesses the 2000cd lighting scenario as Significant and the 200cd lighting scenario as Not Significant. Appendix 5.5 para 5.5.10 highlights that <i>'In reality, it is extremely unlikely that 2,000cd will ever be experienced at its full intensity as it will only operate when visibility is reduced by climatic conditions. Reduced visibility will also affect someone's perception of the intensity of the light fitting.'</i> and that <i>'the worst-case intensity experienced at these viewpoints would likely be represented by the 200cd scenario. This is because the 2000cd intensity lights would only be in operation when visibility is less than 5km and in this situation they would appear far less intense due to the poor visibility surrounding the Proposed Scheme'</i> (Appendix 5.5 para 5.5.10). Allowing for climatic conditions, therefore, the effect would be Not Significant at VP18. In relation to the assessment of BBNP Special Qualities, the LVIA has followed methodology devised by NatureScot which is aimed specifically at landscape professionals undertaking Landscape and Visual Impact Assessments (LVIA) for developments or land use changes with potential to impact on the special qualities of National Scenic Areas or National Parks. NRW agreed that 'the principle of the approach may be acceptable'. Whilst there are differences in the planning context of the National Parks designated in Scotland and Wales, there are nevertheless similarities in the use of special qualities to protect the interests of National Parks as defined in the statutory purposes of the National Parks and Access to the Countryside Act 1949. ES Appendix 5.3 which assesses the Special Qualities of the BBNP has adapted this methodology for use in Wales and includes analysis of landscape character and LANDMAP attributes that underpin the special qualities. Each of the potentially affected special qualities are then assessed for each of the BBNP LCAs considered to have the potential for significant effects. This assessment is detailed and draws on the description of Landscape Character Special Qualities within the Bannau Brycheiniog Landscape Character Assessment. Ultimately the assessment concludes that the Proposed Scheme would have significant effects on Special Quality 1 – <i>'A National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal'</i>, and Special Quality 8 – <i>'In the context of the UK, geographically rugged, remote and challenging landscapes'</i>.

NRW Comment	Applicant Response
	The LVIA Chapter 5 para 5.11.10 concludes a moderate and not significant effect for BBNP LCA 7, largely as a result of distance, the underlying broad upland context of the receiving landscape and the extensive operational wind energy context to the south of the BBNP. The LVIA Chapter 5 paras 5.11.21 – 5.11.25 concludes a minor not significant effect for BBNP LCA 8, as a result of limited visibility within the valleys of Taff and Talybont Reservoir and the position of the Proposed Scheme above a quarry scared upland ridgeline away from the more distinct backdrop of the Central Beacons to the north. The LVIA Chapter 5 paras 5.11.36 – 5.11.39 concludes a localised moderate-major significant effect for BBNP LCA 9 (within 3km) and a moderate not significant effect for other affected parts of this LCA which are found to the west from Mynydd Llangynidr (approximately 5-10km to the west). As for the assessment of landscape character carried out in the LVIA the effects on Special Qualities are considered to be similarly localised. Taking all of this into account it is considered that ES Appendix 5.3 provides a robust assessment of the Special Qualities of the BBNP and does not underestimate the extent of the significant effects.
<i>'We also consider there are more sensitive visual receptors at some of the viewpoints than indicated in the LVIA. The visual effects on recreational users of the open access land on either side of the B4560 are likely to be significant.'</i>	The magnitude of change at viewpoint 19 on the B4560 is assessed in Chapter 5 Table 5.34: Viewpoint – 19 B4560, Cefn Pwll-Coch in the LVIA as 'low'. When considering recreational receptors in the close context of this location, who would have a higher sensitivity than road users, the effect would still considered to be Not Significant when combined with the 'low' magnitude of change.
<i>'In most cases, turbine lighting from these viewpoints would not be back clothed by distant higher ground nor seen in context of Heads of the Valleys settlements, therefore they would interfere with the night sky.'</i>	ES Appendix 5.5 para 5.11.7 found that in views from the BBNP and the Dark Sky Reserve (DSR) that the turbine lights <i>'would be close to or lower than the skyline horizon and therefore have little or no influence on the view of the stars in the night sky above. The nacelle lights would not therefore be detrimental to the overall experience of the dark skies within this part of the DSR.'</i> In views towards the BBNP Appendix 5.5 para 5.6.13 found in relation to viewpoint 7 that <i>'There is a notable level of existing lighting in this view associated with the edge of settlement in the foreground. Other lights can also be seen in the wider view related to traffic on the busy A465 road corridor, individual properties in the intervening landscape and to the west lights associated with the Pengarnddu Industrial Estate. At the time of capturing the photography, floodlights can also be seen to the west associated with the Ffos-y-fran open cast mine.'</i>

NRW Comment	Applicant Response
	In relation to viewing the night sky BBNPA promotes ten viewing locations within the DSR which offer stopping points to view the night sky. Whilst people could feasibly be viewing the night sky from any part of the DSR, it is notable that the Proposed Scheme would not be visible from any of the promoted night sky viewing locations. It is also notable that the majority of locations are located to the north of the Bannau Brycheiniog with views south into the DSR with the Bannau Brycheiniog creating the dark horizon beyond which the night sky can be viewed and away from the settled (and lit) valleys landscape of South Wales. Appendix 5.5 para 5.7.12 concludes that whilst the Proposed Scheme turbines would be visible they would <i>'be visible as points of light'</i> and would not <i>'result in obtrusive light that impedes the view of the night sky, nor result in brightening of the night sky (skyglow) that might be of detriment to the overall experience of the dark skies.'</i>
<i>'The LVIA also concludes there would be significant effects from the following ridge-top viewpoints, looking towards the BBNP:</i> <i>VP9 - Rhymney Common at Rhymney Hill, approximately 3.4km from the site. All the turbines would be seen, plus the network of access tracks, with the open slopes of the BBNP behind;</i> <i>VP16 - Pen Garnbugail on Gelligaer Common at approximately 6.8km. The BBNP plateau rising to distant distinctive skyline of Pen y Fan and Corn Ddu would form the backdrop and detract from the distant view.</i> <i>The LVIA concludes that from viewpoints on other ridges where there are wide views towards the BBNP but at a greater distance (e.g. VP17 - Cefn Manmoel at 7.7km), the effects would not be significant.</i>	For the avoidance of doubt, it should be noted that the NRW description of significant effects is not an extract from the LVIA and does not necessarily correlate with the reasons for the significant effect as reported in the LVIA, which for clarity have been summarised below – • VP9. There are no slopes visible beyond the site area itself. The only visible part of the BBNP is a very small area on the horizon above the upper Rhymney Valley to the east of the site (Table 5.25: Viewpoint – 9 Rhymney Common). • For both VP16 and VP17. Whilst the distinctive jagged summits of Pen y Fan and Corn Ddu are visible from this location they are on a different part of the same skyline and the Proposed Scheme would not encroach on their distinct form (Table . NRW's agreement of the degree of significant and not significant effects for these viewpoints is noted. In terms of 'indirect landscape and visual effects on the BBNP' Appendix 5.3 Table 5.2: BBNP LVA7 – Central beacons states that - <i>'In terms of views towards the Central Beacons from surrounding areas the LVIA has assessed a large number of viewpoints that have views towards the BBNP, particularly from the valleys landscape to the south. The LVIA has found that whilst there may be views of the towards the Proposed Scheme within the context of the southern edges of the BBNP and its broad upland plateau landscape character, views of the Central Beacons are either not experienced in these views due to the intervening upland of southern BBNP or are in a different part of the panorama than the Proposed Scheme. On balance therefore the view of the Central Beacons would not be interrupted from the vast majority of receptors outwith the BBNP area.'</i> For this reason, it is not agreed that the effects on the setting of the BBNP from outwith the BBNP boundary would be significant as is suggested from this comment.

NRW Comment	Applicant Response
<i>Whilst we agree with the significant and non-significant visual effects from these viewpoints, the indirect landscape and visual effects on the BBNP from these viewpoints have not been assessed. We consider these effects on the National Park's LCA7 - Central Beacons and LCA9 - Mynyddoed Llangatwg and Llangynidr and its setting are likely to be significant.'</i>	
<i>Throughout, the cumulative effects are assessed to be minor at most and therefore the proposed development would have no significant cumulative effects.</i> <i>We agree there would be no significant cumulative effects. However, the proposed turbines would be more than twice the height of the various single or small groups of turbines currently situated along the Heads of the Valleys corridor and on the ridges between the Valleys. Therefore, their effects are likely to be perceived as diminishing the overall scale of the receiving landscape and the contiguous parts of the BBNP. This would erode the special qualities of remoteness and sweeping grandeur to a significant and unacceptable extent.</i>	NRW's agreement that there would be no significant cumulative effects is noted. The LCA in which the site is located is HOV LCA17 - Upland north of the Heads of the Valleys corridor. In relation to this 'corridor of land', the LVIA states in Chapter 5 para 5.11.76 <i>'This LCA is a large scale landscape dominated by simple land cover such as large areas of undulating grassland and moorland. The overall upland character is typified by these characterising elements which is particularly evident in contrast with the more settled and lower lying landscape to the south and it is considered that this LCA is an appropriate receiving landscape for wind energy development.'</i> The Heads of the Valleys Landscape Sensitivity and Capacity Study (Gillespies 2015) describes this LCA as <i>'a buffer between the BBNP to the north and development in the Heads of the Valleys road corridor to the south.'</i> Whilst it is acknowledged that this LCA shares its northern boundary with the BBNP, the large-scale broad upland characteristics of the site area continue to the north into BBNP LCA 9 further extending the 'buffer' that this large-scale landscape creates. It is not agreed that the Proposed Scheme would diminish the 'overall scale of the receiving landscape', the LVIA in Chapter 5 para 5.11.76 describes the receiving landscape as – <i>'a large-scale landscape dominated by simple land cover such as large areas of undulating grassland and moorland. The overall upland character is typified by these characterising elements which is particularly evident in contrast with the more settled and lower lying landscape to the south and it is considered that this LCA is an appropriate receiving landscape for wind energy development.'</i>

NRW Comment	Applicant Response
	ES Appendix 5.3 considers that there may be some perceived diminishment of the Special Qualities of 'SQ1 peace and tranquillity' and 'SQ5 sweeping grandeur and outstanding natural beauty' but where effects on SQs are significant these are localised to an area of broad upland at the southern edges of the BBNP. Appendix 5.3 Table 5.4: BBNP LCA9 – Mynyddoed Llangatwg and Llangynidr does not find that the effect on 'remoteness' as part of SQ8 would be significant, noting for BBNP LCA9 that <i>'The introduction of the Proposed Scheme, whilst intensifying the presence of existing development by reducing proximity to it, would not introduce development into a previously undeveloped view of the landscape to the south and the existing sense of remoteness and tranquillity would therefore only be slightly diminished by the intensification as wind turbines are already a characteristic feature in the landscape to the south.'</i>
<i>It is clear from the LVIA there would be widespread changes to the setting of the BBNP. The proposed development would represent a major change to this important corridor of open land that separates the BBNP from the busy Heads of the Valleys corridor with its associated settlements and industrial development. Therefore, we consider the resultant significant adverse effects of the proposed development on the BBNP are unacceptable. Overall, we consider the significant adverse effects on the BBNP cannot be mitigated except by relocation of the development away from this site.</i>	For clarity, there are no references to the 'widespread changes to the setting of the BBNP' in the LVIA and, to the contrary, Appendix 5.3 finds the significant effects on the BBNP and its Special Qualities resulting from the Proposed Scheme to be localised in nature. The LCA in which the site is located is HOV LCA17 - Upland north of the Heads of the Valleys corridor. In relation to this 'corridor of land', the LVIA states in Chapter 5 para 5.11.76 <i>'This LCA is a large scale landscape dominated by simple land cover such as large areas of undulating grassland and moorland. The overall upland character is typified by these characterising elements which is particularly evident in contrast with the more settled and lower lying landscape to the south and it is considered that this LCA is an appropriate receiving landscape for wind energy development.'</i> The Heads of the Valleys Landscape Sensitivity and Capacity Study (Gillespies 2015) describes this LCA as <i>'a buffer between the BBNP to the north and development in the Heads of the Valleys road corridor to the south.'</i> Whilst it is acknowledged that this LCA shares its northern boundary with the BBNP, the large-scale broad upland characteristics of the site area continue to the north into BBNP LCA 9 further extending the 'buffer' that this large-scale landscape creates.

NRW Comment	Applicant Response
	Furthermore, Appendix 5.3 states in Table 5.2: BBNP LCA7 – Central beacons that - <i>'In terms of views towards the Central Beacons from surrounding areas the LVIA has assessed a large number of viewpoints that have views towards the BBNP, particularly from the valleys landscape to the south. The LVIA has found that whilst there may be views of the towards the Proposed Scheme within the context of the southern edges of the BBNP and its broad upland plateau landscape character, views of the Central Beacons are either not experienced in these views due to the intervening upland of southern BBNP or are in a different part of the panorama than the Proposed Scheme. On balance therefore the view of the Central Beacons would not be interrupted from the vast majority of receptors outwith the BBNP area.</i> These factors help to moderate and contain the extent of significant effect within the BBNP area, including the effect on its special qualities.

APPENDIX J

APPLICANTS RESPONSE TO BANNAU
BRYCHEINIOG NATIONAL PARK AUTHORITY'S
CONSULTATION RESPONSE RELATING TO
LANDSCAPE AND VISUAL CONSIDERATIONS

Pen March Wind Farm

DNS ref: DNS/3253147

Landscape and Visual Response to the Bannau Brycheiniog National Park Authority (BBNPA) Consultation Response

Introduction

This report provides the Applicant's response to the BBNPA consultation response dated 15/12/22 (BBNPA ref: 22/21530/SPACON), which sets out its comments on landscape and visual matters relating to the Pen March Wind Farm (the Proposed Scheme).

It represents the view of the Applicant, RWE and has been prepared by Optimised Environments Ltd (OPEN), the appointed landscape advisors on the project team and authors of the landscape and visual impact assessment (LVIA). We have set out this response to assist in clarifying aspects of BBNPA's comments and concerns regarding the landscape and visual impacts of the Proposed Scheme.

Our response to BBNPA's comments is set out in Table 1 below. For ease of reference, we have structured our response in line with the main issues raised by BBNPA. We have reproduced text from BBNPA's letter in the left-hand column and provided our response to points raised in the right-hand column.

Table 1: Consultee comments and response

BBNPA Comment	Applicant Response
<i>'Thank you for your consultation received 2 November 2022 regarding the above. We note prior to this consultation we have on record an email in September 2022 querying projects to include in the cumulative EIA chapter. We do not have any other record of the planning department being consulted on this project beyond the above.'</i>	In email exchange between RWE and BBNPA, inviting BBNPA to attend an L&V focussed consultation meeting planned for the 14.01.21, BBNPA replied on 11.01.21 advising that - <i>'The National Park Authority do not have a landscape architect, but we work closely with Onwen Mailment of NRW to assess impacts of major developments on the setting of the National Park. I would therefore welcome sight of any comments from NRW in relation to the Landscape impact of the proposed development.'</i> The minutes from the meeting held on 14.01.21 with NRW were sent to BBNPA on 12.02.21. The discussion topics of the meeting included viewpoint selection, visual assessment of aviation lighting, cumulative assessment, LANDMAP and BBNP Special Qualities. An email was sent to BBNPA on 09/03/21 confirming viewpoint selection rationale following consultation discussions (including detailed comments from NRW) and a final viewpoint list / map provided.
<i>BBNPA highlights the current Special Qualities of the National Park may be subject to change and that 'a new Management Plan 'Future Bannau' (2023-2028) is in advanced stages of drafting and is targeted for adoption in April 2023. Therefore, the BBNPA special qualities which PPW states should be given weight in the development management process may be subject to change pending the adoption of this new Plan.'</i>	Notwithstanding potential further change to the Special Qualities as a result of the new management plan (2023-2028), it should also be noted that the changes to the Special Qualities in the Nov 2021 Consultation Draft 'Future Beacons: The Management Plan for the Bannau Brycheiniog National Park 2022-2027', are very minor and it is considered that the submitted assessment of Special Qualities in Appendix 5.3 is a comprehensive assessment of the Special Qualities, which are largely the same as those noted in the consultation draft.
<i>'Policy – the ES generally needs to refer to relevant BBNPA Policy context – but particularly in the LVIA chapter. Please note para 3.16.2.10 of the LDP which states "The impact of large scale Renewable Energy projects located on our peripheries will be judged in accordance with SP2 Major Development in the National Park."</i>	The relevant landscape and visual Policy Context to the area in which the site is located is noted in the LVIA. The Policy context of the BBNPA is considered in the planning statement. The Proposed Scheme is not within the BBNP and in line with BBNPA SP9 which states that the <i>'impact of large scale Renewable Energy projects located on our peripheries will be judged in accordance with SP2 Major Development in the National Park'</i> and BBNPA SP2 which requires an assessment of <i>'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which these could be moderated'</i>, the LVIA has assessed the effects on the BBNP and its special qualities in detail.

BBNPA Comment	Applicant Response
<i>'Study area of LVIA: the 45km radii includes land which encompasses the entirety of the National Park. The 45km radii is considered broadly appropriate. We note 26km has been used for landscape character consideration.'</i>	The 26km study area for the consideration of landscape character effects was agreed with NRW and is based on specific development characteristics described and advocated in LANDMAP guidance note 46.
<i>'Dark Skies: NRW at scoping stage highlighted the need for visualisations regarding lighting and the impact on the Dark Sky Reserves. We note 2 viewpoints within the BBNPA area – some of which are located within the Dark Skies Core - have been considered in the draft ES. ES Para 5.13.13 states: "Significant effects are predicted for representative night time Viewpoint 18 [Bannau Brycheiniog] Way (Craig Y Fan Ddu) as a result of the 2000cd scenario reducing to not significant for the 200cd scenario (in reality, it is extremely unlikely that 2,000cd will ever be experienced at its full intensity as it will only operate when visibility is reduced by climatic conditions). For the other representative viewpoints, the effect is assessed as not significant. The overall effect of the Proposed Scheme turbine lights on the Dark Sky Reserve is considered to be Not Significant. See also Technical Appendix 5.5, (Volume 4)". We are concerned with the potential this scheme has for significant effects at higher cd particularly given this lighting will appear much higher in the skyline than other surrounding features.'</i>	The representative viewpoints used for night-time visualisations, including within the BBNP, were agreed in consultation with NRW. As noted previously, the minutes from the discussions relating to viewpoints (including night-time viewpoints and visual assessment of aviation lighting) were forwarded to BBNPA on 12.02.21. As noted in Appendix 5.5, the required medium intensity lights are only likely to be operated at their maximum 2,000 cd during periods of poor visibility (visibility which is less than 5km), and that in periods of visibility greater than 5km the lights can be dimmed to 10% of their operational intensity i.e. 200cd. The turbine light is also designed to emit required light intensity in the -1° to +2° horizontal band, around 360°. Beyond -1° and +2° the intensity can reduce, depending on the specific performance characteristics of the light installed. Accordingly, the perceived Candela (cd) intensity of the aviation lights will therefore vary depending on different vertical angles from the nacelle mounted aviation light. Figure 5.5-4 – Lighting Intensity ZTV shows where the different intensities would be visible within the surrounding landscape, assuming one make of light. Distance is also a mitigating factor in relation to the intensity of light experienced from affected areas of the BBNP as the more elevated locations within the Central Beacons (meaning that the aviation lights are more likely to be experienced on a similar horizontal plane) are also distant from the Proposed Scheme and so the intensity of the light experienced would be substantially reduced. Taking this into account, it is considered that in periods of poor visibility should the 2000cd lights be seen at all beyond 5km, that the visual effect would be negligible. It stands to reason therefore that the 200cd intensity represents a more likely worst case illumination level.
<i>'Viewpoints: Figure 5.11a Blade ZTV with viewpoints – shows an extensive area in the BBNPA area where at least 5-6 blade tips will be visible. Of the 26 LVIA viewpoints (9 are located within the BBNPA area) and of 7 wireframe only</i>	In Chapter 5 para 5.8.31 the LVIA describes theoretical visibility in relation to the BBNP as follows <i>'To the north and within BBNP theoretical visibility is found on the hill summits, ridgelines and elevated plateaux within the central area of the BBNP, particularly immediately to the north of the site. More distant patches of theoretical visibility are also</i>

BBNPA Comment	Applicant Response
<i>viewpoints (4 are located in BBNPA)'</i> <i>'Setting aside our thoughts on the outcome of the assessment of visual effects, dialogue has not been undertaken with BBNPA on these viewpoints (we note Pen Cerrig Calch has not been included in the viewpoints for example?) although we understand dialogue has been undertaken with NRW on these. Please note para 5.8.5 of the ES appears incorrect on this account.'</i>	<i>found to the east on The Black Mountains and Sugar Loaf and to the west on the moorland plateau of Forest Fawr.'</i> The theoretical visibility of the Proposed Scheme was used in the viewpoint agreement discussions held with NRW, which largely focussed on the interests of the BBNP. BBNPA declined to attend these discussions and were advised of the outcome of the discussions and the resulting viewpoint selection. It is considered therefore that para 5.8.5 in the LVIA is correct in its explanation of viewpoint agreement consultation. The viewpoint at Pen Cerig Calch is considered in the LVIA, however, the preliminary assessment in Chapter 5 para 5.12.5 of the LVIA found that <i>'there is no potential for significant effects due to the cumulative baseline viewed to the west within the same part of the view as the Proposed Scheme combined with distance which limits the influence of further wind energy development on the existing view.'</i>
<i>'Visual effects: The ES outlines that there would be significant visual effects extending approximately 8km within the BBNPA. Particularly BBNPA viewpoints 8, 15 and 18 appear to be most visually impacted on by the proposal. We consider the residual effects have been underestimated in parts, considering the heightened sensitivity of the area given its recreational and open access nature. We are therefore very concerned by the proposal's residual visual effects and its resultant impact on the BBNPA.'</i>	It is acknowledged that there is a heightened sensitivity for receptors within the BBNP which correlates with the assessment of high value for each of the viewpoints assessed within the BBNP, reflecting the high value of nationally designated areas of landscape. It is also acknowledged that the LVIA finds significant effects for viewpoints 8, 15 and 18. The other viewpoints within the BBNP have been assessed as having a low magnitude of change. This is either because of limited visibility, such as for viewpoint 5, or as a result of a combination of factors including distance, the influence from operational wind energy in the view and the underlying broad upland context of the receiving landscape such as for viewpoints 19, 21 and 24.

BBNPA Comment	Applicant Response
<i>'Landscape effects: The draft ES outlines no significant effects on the special qualities of the BBNPA, with the exception of an area approximately 3km at the southern edges of the BBNPA. Six Landscape Character Areas (LCAs) in the BBNPA are 'identified as having potential for significant effects and are included in a detailed assessment'. Based on table 5.39 of the LVIA chapter – the following BBNPA LCAs have been assessed as follows:</i> <i>- no. 7 (Central Beacons – moderate and not significant landscape effect),</i> <i>- 8 (Cefn yr Ystrad – minor and not significant effect),</i> <i>- 9 (Rhymney Common – moderate-major significant landscape effect and moderate and not significant)'</i>	Whilst the LCAs named in these comments appear to correlate in terms of LCA numbering with those assessed in the LVIA, the naming of these is imprecise in the consultee response, and the geographical association with other character areas in the locale is potentially misleading. To clarify, only 3 of the BBNP LCAs are considered in the LVIA to have the potential for a significant effect, these are – BBNP LCA7 - Central beacons; BBNP LCA8 - Talybont and Taff Reservoir Valleys; and BBNP LCA9 - Mynyddoed Llangatwg and Llangynidr. The LVIA concludes a moderate and not significant effect for BBNP LCA 7, largely as a result of distance, the underlying broad upland context of the receiving landscape and the extensive operational wind energy context to the south of the BBNP (Chapter 5 para 5.11.10). The LVIA concludes a minor not significant effect for BBNP LCA 8, as a result of limited visibility within the valleys of Taff and Talybont Reservoir and the position of the Proposed Scheme above a quarry scared upland ridgeline away from the more distinct backdrop of the Central Beacons to the north (Chapter 5 paras 5.11.21 – 5.11.25). In Chapter 5 paras 5.11.36 – 5.11.39 the LVIA concludes a localised moderate-major significant effect for BBNP LCA 9 (within 3km) and a moderate not significant effect for other affected parts of this LCA which are found to the west from Mynydd Llangynidr (approximately 5-10km to the west)

BBNPA Comment	Applicant Response
<i>'The proposal is located in a corridor of land beyond the Heads of the Valley's Road which is contiguous with the National Park beyond. The proposal will introduce a major change into this area.'</i>	The LCA in which the site is located is Heads of the Valley (HOV) LCA17 - Upland north of the Heads of the Valleys corridor. In relation to this 'corridor of land', the LVIA states in Chapter 5 para 5.11.76 <i>'This LCA is a large scale landscape dominated by simple land cover such as large areas of undulating grassland and moorland. The overall upland character is typified by these characterising elements which is particularly evident in contrast with the more settled and lower lying landscape to the south and it is considered that this LCA is an appropriate receiving landscape for wind energy development.'</i> The Heads of the Valleys Landscape Sensitivity and Capacity Study (Gillespies 2015) describes this LCA as <i>'a buffer between the BBNP to the north and development in the Heads of the Valleys road corridor to the south.'</i> Whilst it is acknowledged that this LCA shares its northern boundary with the BBNP, the large scale broad upland characteristics of the site area continue to the north into BBNP LCA 9 further extending the 'buffer' that this large scale landscape creates. Furthermore, Appendix 5.3 states in Table 5.2: BBNP LCA7 – Central beacons that - <i>'In terms of views towards the Central Beacons from surrounding areas the LVIA has assessed a large number of viewpoints that have views towards the BBNP, particularly from the valleys landscape to the south. The LVIA has found that whilst there may be views of the towards the Proposed Scheme within the context of the southern edges of the BBNP and its broad upland plateau landscape character, views of the Central Beacons are either not experienced in these views due to the intervening upland of southern BBNP or are in a different part of the panorama than the Proposed Scheme. On balance therefore the view of the Central Beacons would not be interrupted from the vast majority of receptors outwith the BBNP area.'</i> These factors help to moderate and contain the extent of significant effect within the BBNP area, including the effect on its special qualities.

BBNPA Comment	Applicant Response
<i>'We are very concerned with the landscape impact of the proposal and its resulting impact on the statutory purposes and special qualities of the BBNPA.'</i>	The Statutory Purpose for designation of National Parks is set out as follows: • The National Parks and Access to the Countryside Act 1949 provided the framework for the establishment of National Parks and AONBs and sets out their purpose of conserving and enhancing natural beauty, wildlife and cultural heritage of National Parks and of promoting opportunities for the understanding and enjoyment of the special qualities of those Parks by the public. • The Environment Act 1995 Sets out the duty of certain bodies to have regard to the purposes for which National Parks are designated (to preserve and enhance the natural beauty of the Park areas and for the purpose of promoting their enjoyment by the public) that they shall seek to foster the economic and social well-being of local communities within the National Park by cooperating with local authorities. <i>'If it appears there is a conflict between those purposes then the relevant authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area of the National Park.'</i> These purposes are reflected in Planning Policy Wales, Edition 11, which states in para 6.3.3 – <i>'In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities. (The Sandford Principle provides that, where there is a conflict between these purposes, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage).'</i> Specifically relating to the Bannau Brycheiniog National Park, the Landscape and Development Supplementary Planning Guidance, BBNPA 2014 also states - <i>'The National Park Authority seeks to ensure a sustainable future for our communities and this special landscape by seeking to manage the scale of landscape change posed by development. We do this by expecting the highest standards of design from all new development, including careful consideration of siting and position within the landscape. Through this level of scrutiny, the Authority is able to ensure that no development occurs which could compromise the integrity of the area's natural beauty.'</i>

BBNPA Comment	Applicant Response
	A key question, therefore, in terms of the Statutory Purpose of the BBNP is - could the Proposed Scheme 'compromise the integrity' of the BBNP and its Special Qualities such that it could no longer be considered to meet the objectives of a National Park? In considering this question within the context of the assessment in Appendix 5.3, the 'integrity' of the BBNP is considered to be a measure of the degree to which its Special Qualities continue to define the area. Appendix 5.3 para 5.7.3 summarises the limited level of effect on the affected BBNP SQs within the core area of the BBNP as due to the following moderating factors – <i>'the separation between the Proposed Scheme and the area in which the SQ would be experienced; the underlying broad upland context of the upland of the site and surrounding area of moorland at the edges of and to the south of the BBNP which is considered to be a suitable receiving landscape for the Proposed Scheme; and the extensive presence of operational wind energy development in views south and west from the BBNP which provides an underlying wind energy context for the Proposed Scheme which would not be viewed as entirely uncharacteristic as a result. The sense of remoteness and tranquillity will not be lost and the pattern and diversity of the landscape will remain intact.'</i> The Special Qualities for the majority of other BBNP areas to the east and west of the core area would be relatively unaffected and significant effects have been assessed as limited to BBNP LCA 9 within a localised area of around 3km. It is acknowledged that there would be some localised significant adverse effects to BBNP SQs within BBNP LCA 9 and that in this respect only the Proposed Scheme would therefore not be consistent with objectives that seek to enhance the natural beauty or quality of the National Park. However, it is also the case that almost no large-scale development would be able to fully comply with the principle of enhancement and therefore it must be anticipated that any wind energy development would give rise to some degree of friction with such an aim. The Welsh Government has identified Pre-assessed Areas for Wind Energy (PAWE). Future Wales, The National Plan 2040, identifies 10 such areas, 4 of which are found around the periphery of the BBNP – PAWE 5 and 8 are to the north and west of the BBNP at approximately 2.7km and 4.9km respectively, PAWE 9 and 10 are to the south of the BBNP at approximately 1.7km and 3km respectively.

BBNPA Comment	Applicant Response
	Policy 17 of Future Wales states that – <i>‘In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18.’</i> This suggests there is a recognition that whilst there will be change to the current landscape baseline within close context to the BBNP through development progressed at its periphery, that this change will generally be considered acceptable. Policy 18 of Future Wales states that Developments of National Significance will be permitted subject to policy 17 and <i>‘outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)’</i> Appendix 5.3 considers that there may be some perceived diminishment of the Special Qualities of ‘SQ1 peace and tranquillity’ and ‘SQ5 sweeping grandeur and outstanding natural beauty’ but such effects are not considered to be significant for the majority of the BBNP, including within its core area in the Central Beacons and where effects on SQs are significant these are localised to an area of broad upland at the southern edges of the BBNP. It is therefore considered that whilst the Proposed Scheme is at a closer proximity to the BBNP than the Pre-Assessed areas, SQs would not be diminished to such a degree by the Proposed Scheme that it would affect the overall integrity of the BBNP or its inherent natural beauty and it would occur within a context and understanding of the need for change including accommodating alternative energy, such as within the nearby Pre-Assessed areas.
<i>‘We consider the assessment has underestimated the sensitivity of landscape character areas assessed and also underestimates the impact of the development on SQs in our opinion.</i> <i>We note moderate and significant effects to SQ 1 and 8 in LCA 9 within 3km are identified and are very concerned by this.’</i>	For the LCAs within BBNP the value judgements within the landscape character assessment have considered the LANDMAP evaluation of the underlying visual and sensory and historic landscape LANDMAP aspect areas. LANDMAP Methodology Overview (NRW 2017) describes LANDMAP evaluation ratings as follows - <i>‘Outstanding - nationally important; High - regional or county importance; Moderate - local importance; and Low - little or no importance’.</i>

BBNPA Comment	Applicant Response
	As explained in Appendix 5.2 LANDMAP para 5.1.4, <i>'It should be noted that in the LVIA methodology for this assessment, a 'High' value is the highest rating for value which is unlike the LANDMAP evaluation which includes an 'outstanding' rating above its 'high' rating. Following the LVIA methodology for instance, a nationally important landscape is likely to have a High value rating and a regionally important landscape is likely to have a Medium-High value rating.'</i> For BBNP LCA7 value has been assessed as high which reflects the LANDMAP evaluation of largely outstanding (nationally important) with smaller areas of high. For BBNP LCA8 and BBNP LCA9 value has been assessed as medium-high which reflects the LANDMAP evaluation of largely high (regionally important) with smaller areas of outstanding and moderate. The overall sensitivity judgement also takes account of susceptibility to change and is important to note that GLVIA3 places the emphasis of this judgement on <i>'the susceptibility of the receptor to the type of change arising from the specific proposal'</i> (GLVIA3 para 3.26). <i>'Since landscape effects in LVIA are particular to both the specific landscape in question and the specific nature of the proposed development, the assessment of susceptibility must be tailored to the project.'</i> (GLVIA3 para 5.42). Susceptibility judgements therefore vary for these character areas depending on several factors, including - the specific nature of the Proposed Scheme; the key landscape characteristics and the degree to which the landscape character receptor may accommodate the influence of the Proposed Scheme; and Landscape association which relates to the associations that exist between the landscape receptor where the Proposed Scheme is located and the landscape receptor from which the Proposed Scheme is being experienced. Further detail on susceptibility methodology is presented in Appendix 5.1. The LVIA describes the sensitivity judgements for BBNP LCA 7, 8 and 9 and these are summarised below. For BBNP LCA 7 the key characteristics are susceptible to change due to the open and exposed quality of this mountainous landscape. This is slightly moderated by the large scale of the receiving landscape and the existing wind turbines to the south resulting in a medium-high susceptibility and overall high sensitivity when combined with the high value judgement.

BBNPA Comment	Applicant Response
	For BBNP LCA 8 susceptibility judgements are more complex with key characteristics more susceptible to change in the Taff and Tallybont valleys than western areas of this LCA which is less susceptible to change due to the large scale and simple landform of the receiving landscape which lies to the east and widespread operational wind turbines to the south. Resulting in a medium-low susceptibility and overall medium sensitivity when combined with the medium-high value judgement. For BBNP LCA 9 whilst the close proximity of the Proposed Scheme increases susceptibility it is moderated by the widespread operational wind turbines to the south. Resulting in a medium susceptibility and overall medium-high sensitivity when combined with the medium-high value judgement. In relation to the assessment of BBNP Special Qualities, the LVIA has followed methodology devised by NatureScot which is aimed specifically at landscape professionals undertaking Landscape and Visual Impact Assessments (LVIA) for developments or land use changes with potential to impact on the special qualities of National Scenic Areas or National Parks. NRW agreed that 'the principle of the approach may be acceptable'. Whilst there are differences in the planning context of the National Parks designated in Scotland and Wales, there are nevertheless similarities in the use of special qualities to protect the interests of National Parks as defined in the statutory purposes of the National Parks and Access to the Countryside Act 1949. Appendix 5.3 which assesses the Special Qualities of the BBNP has adapted this methodology for use in Wales and includes analysis of landscape character and LANDMAP attributes that underpin the special qualities. Each of the potentially affected special qualities are then assessed for each of the BBNP LCAs considered to have the potential for significant effects. This assessment is detailed and draws on the description of Landscape Character Special Qualities within the Bannau Brycheiniog Landscape Character Assessment. Ultimately the assessment concludes that the Proposed Scheme would have significant effects on Special Quality 1 – <i>'A National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal'</i>, and Special Quality 8 – <i>'In the context of the UK, geographically rugged, remote and challenging landscapes'</i>. As for the assessment of landscape character these effect would be localised to approximately 3km from the Proposed Scheme within BBNP LCA 9.

BBNPA Comment	Applicant Response
	Taking all of this into account it is considered that Appendix 5.3 provides a robust assessment of the Special Qualities of the BBNP and does not underestimate either the sensitivity or the effect on the Special Qualities. In relation to the BBNPA 'concern' related to significant effects, see previous comments relating to the Statutory Purposes of the BBNP and the integrity of the BBNP and its Special Qualities.
<i>'It is not clear whether the assessment has been taken on impacts on SQ without consideration to matters like movement of blades which can have impacts on the SQs in their own right (and only appear to have been considered in the context of impact on residential properties).'</i>	To clarify, the rotation of turbine blades is a visual characteristic of the Proposed Scheme that is considered throughout the LVIA. This is described in Appendix 5.1 para 5.6.12 in the section titled – Magnitude of Change on Views which states – <i>'Contrasts and changes may arise particularly as a result of the more notable rotation movement of the wind turbine blades, as a characteristic that gives rise to effects of the Proposed Scheme'</i> .
<i>'Cumulative: the draft ES concludes no significant effects from cumulative effects. It states there is no consented wind energy developments in close proximity to the proposed scheme (i.e. within 20km).'</i>	This statement is correct and NRW have similarly concluded no significant cumulative effects in their consultation response dated 21/12/22 - <i>'Throughout, the cumulative effects are assessed to be minor at most and therefore the proposed development would have no significant cumulative effects. We agree there would be no significant cumulative effects.'</i>

BBNPA Comment	Applicant Response
<i>'As highlighted above, there are a number of other DNS schemes through various stages of the consenting process and whilst these may be beyond the 20km distance could still have a cumulative impact which needs to be accounted for. We are concerned with the potential for a proliferation of such schemes on the fringes of the National Park should these be consented and note the cut-off point of February 2022 mentioned in the draft ES. We concur with NRW's comments that there are potential cumulative effects on landscape and visual matters can occur over a large radius. We are concerned with the cumulative impact which will result should these schemes be consented.'</i>	The DNS schemes described here (and listed in the earlier part of the BBNP response) are developments that have undergone a scoping process but have not yet been submitted as a planning application with a final design. Appendix 5.1 paras 5.9.15 – 5.9.16, in the section titled Cumulative Development Scenarios, states that - <i>'the assessment of the cumulative impacts associated with the Proposed Scheme should encompass the effects of the proposal in combination with existing, under construction, consented and application stage wind farms awaiting determination.</i> <i>Schemes that are at the pre-planning or scoping stage are not considered in the assessment of cumulative effects because firm information on which to base the assessment is not available. Scoping stage sites are mapped on Figures 5.22a-b for reference but are not considered further due to layout and design uncertainties at the pre-application stages'.</i> GLVIA3 supports this approach of assessing projects with planning consent and those that are subject of a valid planning application, stating (para 7.14) that <i>'schemes that are at the pre-planning or scoping stage are not generally considered in the assessment of cumulative effects because of uncertainty about what will actually occur, that is, is not reasonably foreseeable'.</i> However, GLVIA3 (para 7.14) also notes that <i>'there may be occasions where such schemes may be included in the assessment if the competent authority or consultation bodies consider this to be necessary. Such a request should only be made if absolutely necessary to make a realistic assessment of potential cumulative effects'.</i> Therefore, in order to address the concerns that BBNPA have in these comments, an assessment of scoping stage cumulative wind farm developments will be included within the ES.