

TECHNICAL APPENDIX 1.3 - SCOPING CONSULTATION SUMMARY TABLE

Table 1: Summary of scoping consultation responses and where these have been addressed in the Environmental Statement (ES).

Consultee	Topic area	Issues raised	Where this is addressed in the ES
PEDW, DNS Scoping Direction, January 2022	Wind turbines	PEDW has noted that the Coal Authority disagrees with the conclusions of the submitted Coal Mining Risk Assessment (CMRA) and that there is risk of unrecorded shallow mining works in the area. The Applicant should take into account the Coal Authority's comments regarding the presence of extensive legacy workings in the area and PEDW agrees with the Coal Authority that conclusions cannot be drawn at this stage without further assessment. Where different types of turbine foundations are required, the Applicant should consider that this may have an impact on other aspects (for example ecology, noise and traffic). The ES should include a detailed description of construction methods and the worst-case scenarios considered as appropriate.	The risks associated with coal mining are described in Technical Appendix 9.2: Coal Mining Risk Assessment of the ES and related studies presented elsewhere. Investigations have demonstrated that the presence of shallow coal across the site is not expected and will not impact the proposed wind farm. A Construction Environmental Management Plan (CEMP) would be prepared once planning consent has been gained. This would be agreed with the Local Authority prior to any construction works taking place and would describe the detailed methods of construction and working practices.
	Energy storage	PEDW notes that the SR does not state which type of energy storage technology might be proposed. The ES should be clear as to the technology proposed, including sufficient detail and ensuring that the likely effects are assessed appropriately. See also comments below regarding Safety and major accidents	No energy storage technologies are proposed for this development.
	Access	PEDW is aware that Old Pant Road, Pant Road and the unnamed road to the Site are narrow and in some points bordered by hedgerows. It is very likely that the access route will require widening to allow for Abnormal Indivisible Loads (AIL) and that hedgerows and trees will require removal and cutting. Additionally, parts of Pant Road and Central Avenue are residential with parking on both sides. There is also a primary school located just north of the junction of Pant Road and Central Avenue. The Applicant is reminded that the application will have	It is anticipated that highway modification works would be required at several locations along the proposed access route in order to accommodate AIL delivery. All intended highway modification improvement works, including vegetation clearance, is summarised in Chapter 10: Traffic, Transport and Access.

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		to include all intended works, including vegetation clearance of the access road.	
	Grid connection	The SR does not include details on the grid connection and indicates that may be subject to a separate consenting regime. Nonetheless, the ES should address the grid connection in a proportionate manner based on the level of certainty as to the likely connection route at the time of the DNS application being made.	<p>Connection to the grid will be the subject of a separate application. As such it has not been considered as part of this assessment.</p> <p>However, RES has received a connection offer for Mynydd Maen Wind Farm from the network operator NGED including an indicative grid connection method and location directly adjacent to the on-site substation.</p>
	Use of borrow pits	The SR does not mention that borrow pits are proposed. However, as the EIA process progresses, should the Applicant decide that construction material will be obtained within the site, the ES should be clear as to what is proposed and ensure that all aspects of the development are appropriately assessed.	<p>RES requested an updated Scoping Direction to account for the inclusion of potential borrow pits in the proposals on 13th July 2023. RES received subsequent confirmation to proceed without an updated Scoping Direction on the same day, provided that additional assessments properly capture any impacts from the addition of the borrow pit and provide a rationale in the ES.</p> <p>Proposals for three potential borrow pits are included in Chapter 3: Proposed Development and Chapter 10: Traffic, Transport and Access of the ES and a Borrow Pit Method Statement would be agreed with the Local Authority prior to the commencement of construction.</p>
	Iterative changes following scoping	The applicant is reminded that regulation 17(4)(c) of the 2017 Regulations states that an ES must: <i>(c) where a scoping opinion or direction has been issued in accordance with regulation 14 or 15, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was the subject of that opinion or direction)</i>	The ES is based on the Scoping Direction issued January 2022.
	Air quality	PEDW notes that Hafodyrynys Road to the north of the Site is an Air Quality Management Area (AQMA). The proposed construction traffic route does not cross the AQMA at this stage. However, should the	The construction traffic route has remained unchanged since the Scoping Direction was issued in January 2022.

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		<p>proposed construction traffic route change in future and affect the AQMA, the impacts on air quality will need to be addressed in the ES. Paragraph 3.6 of the SR notes that AIL will pass adjacent to Margam AQMA during turbine delivery. PEDW agrees that the potential impact of these deliveries will not be significant.</p> <p>PEDW therefore agrees that Air Quality can be scoped out based on the current information provided in the SR. However, this should be kept under review as the EIA process progresses</p>	<p>Prior to construction commencing, a Construction Traffic Management Plan (CTMP) would be developed in consultation with the relevant County Borough Councils.</p>
	<p>Ground conditions and contamination</p>	<p>PEDW disagrees that ground conditions should be scoped out of the EIA process. The Site falls within a high risk coal mining area and certain parts of the Site are affected by contamination. A ground condition and land contamination assessment needs to be included in the ES. PEDW notes the Coal Authority comments on the provided Coal Mining Risk assessment and agrees that excluding risk of shallow mining is premature at this stage. The ES should include a Coal Mining Risk Assessment, including risk of subsidence. Areas at risk should be avoided.</p> <p>The Applicant's attention is also drawn to TCBC comments regarding the impact of the proposal on aggregates resources. This needs to be addressed in the ES. The ES should include an outline Construction and Environmental Management Plan (CEMP). The CEMP should include measures to address contamination on Site and pollution prevention.</p>	<p>The risks associated with coal mining are described in Technical Appendix 9.2: Coal Mining Risk Assessment of the ES and related studies presented elsewhere. Investigations have demonstrated that the presence of shallow coal across the site is not expected and will not impact the proposed wind farm.</p> <p>A report was commissioned to determine the potential impact relating to potential land contamination. Technical Appendix 3.2: Geo-environmental Report (Argyll Environmental) covers the entire proposed wind farm. This assessment concludes that based on the above, the only source of land contamination is linked to potentially contaminative industrial uses, all would seem to be benign in the context of impact on and impact by the proposed wind farm.</p> <p>A Construction Environmental Management Plan (CEMP) would be prepared once planning consent has been gained. This would be agreed with the Local Authority prior to any construction works taking place and would describe the detailed methods of construction and working practices.</p>

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			<p>The CEMP would detail a number of measures to deal with pollution prevention.</p> <p>The potential issue regarding the supply of aggregates, or mineral products, in the area, is addressed within Chapter 14: Socioeconomics.</p>
	Human health	PEDW agrees that human health can be addressed within other chapters such as noise, shadow flicker, water resources and ground conditions and contamination.	The assessment of the impact of the proposed wind farm on human health is addressed within various topics of the ES, including Chapter 2: Design Evolution and Alternatives, Chapter 5: Landscape and Visual, Chapter 9: Hydrology and Hydrogeology, Chapter 11: Acoustic and Chapter 12: Shadow Flicker and Reflected Light.
	Aviation and defence	PEDW disagrees that Aviation can be scoped out of the ES. Consultation with NATs, the MoD and Cardiff International Airport needs to be carried out and mitigation measures may be required to ensure that the proposal does not affect operational safety. This needs to be addressed appropriately in the ES.	The potential impacts of the proposed wind farm on aviation are assessed within Chapter 13: Aviation and Electromagnetic Interference. The chapter also includes a summary of consultation with all relevant organisations which could be affected by the proposed wind farm.
	Telecommunications	PEDW disagrees that Telecommunications can be scoped out of the ES. Consultation with OFCOM and utilities providers needs to be carried out and mitigation measures may be required to ensure that the proposal does not affect utilities operations. This needs to be addressed appropriately in the ES.	The potential impacts of the proposed wind farm on telecommunications are assessed within Chapter 12: Shadow Flicker and Reflected Light. The chapter also includes a summary of consultation with all relevant organisations which could be affected by the proposed wind farm.
	Waste	<p>An outline Construction and Environmental Management Plan (CEMP) is required as part of the ES.</p> <p>The production of waste material during construction should be considered. This information should inform aspects assessment consistently throughout the ES. Waste is therefore scoped into the ES. It may be addressed within other relevant chapters or as a separate chapter.</p>	<p>A Construction Environmental Management Plan (CEMP) would be prepared and implemented to set out the measures required to protect ecology and hydrology at the site during the construction phase. The detail of the CEMP would be prepared and agreed with the Local Authority prior to commencement of construction.</p> <p>Waste disposal is addressed within Chapter 3: Proposed Development and Chapter 9: Hydrology and Hydrogeology within the ES.</p>

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	Accidents and Disasters	<p>The Applicant's attention is drawn to comments received from the Coal Authority regarding the risks in relation to former mine workings. See also comments above.</p> <p>The Applicant's attention is also drawn to the response received from HSE, which indicates the presence of Major Hazard Pipelines safety zone within the proposed development area. The applicant should liaise with HSE over this issue and address it as appropriate in the ES.</p> <p>The proposal includes energy storage facilities and at this stage it is not clear which type of technology will be proposed. PEDW notes that there is a potential fire risk associated with certain types of batteries such as lithium- ion and that safety measures are required in the design to minimise the risk of fire. PEDW considers this to be part of the EIA process in line with Schedule 4 of the EIA Regulations.</p> <p>Vulnerability to risks of major accident or disaster is therefore scoped into the ES. It may be addressed within other relevant chapters or as a separate chapter.</p>	<p>The risks associated with coal mining are described in Technical Appendix 9.2: Coal Mining Risk Assessment of the ES and related studies presented elsewhere. Investigations have demonstrated that the presence of shallow coal across the site is not expected and will not impact the proposed wind farm.</p> <p>Using information gathered as part of the utility surveys carried out on the site, an appropriate buffer was applied to High-Pressure Gas Pipelines (HPG) to ensure that turbines were sited at a sufficient distance.</p> <p>No energy storage facilities are proposed for this development.</p>
	Climate change	<p>PEDW agrees that Climate Change can be addressed as part of other aspects. The SR states that a carbon calculation will be conducted. This should be included in the ES and should consider the effects of the Proposed Development on peat. Therefore, this aspect is not Scoped out of the EIA process</p>	<p>The potential impacts of the proposed wind farm on the peat present on site is addressed within Chapter 9: Hydrology and Hydrogeology. Technical Appendix 3.1: Carbon Balance Report has been produced to assist with the assessment of the proposal's impact on the existing peat body within the proposed wind farm site, and to assess the impact in terms of carbon dioxide (CO₂) emissions against the total potential carbon savings attributed to the proposed wind farm.</p>
	Socioeconomics	<p>PEDW agrees with the approach provided in the SR.</p>	<p>The approach to desk study and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 14: Socioeconomics.</p>

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	LVIA Search and Study Areas	The applicant's attention is drawn to comments from NRW regarding the interpretation of NRW's LANDMAP Guidance Note 46. PEDW agrees with NRW that the ES should employ a search area of 26 km and a study area of 24 km, based on that guidance.	The approach to desk study, survey work and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 5: Landscape and Visual. Based on the professional judgement of the authors of the LVIA and their extensive experience of similar onshore wind energy projects across the UK, an initial LVIA study area of 35 km and a detailed LVIA study area of 24 km has been determined.
	Viewpoints & Photomontages	PEDW notes that due to the scale of the plan provided at Appendix 3 of the SR, it is difficult to note the exact location of the viewpoints proposed. A number of consultees has suggested additional viewpoints (see Appendix 1). Additionally, photomontages are required. These are to be produced in accordance with Landscape Institute Technical Guidance Note (TGN) 06/19 and SNH Visual representation of wind farms (2017). The Applicant should note that many large scale wind farm projects are proposed within the area (see section 6 of this Scoping Direction) and the photomontages should consider the cumulative effects as far as possible. The Applicant should agree the final list of viewpoints and photomontages with the relevant consultees.	A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual. Visualisations were produced for each of the viewpoints; these are presented in Volume 3. An explanation of how they were produced and information to be read in conjunction with the visualisations is provided in Technical Appendix 5.2.
	LVI Cumulative impacts	There are a significant number of renewable energy schemes at various stages of the consenting process that could result in cumulative effects and the current policy environment is supportive of renewable energy. The applicant is therefore advised to monitor progress of other schemes (see section 6 of this Scoping Direction) and to ensure an accurate and up to date baseline upon finalisation of the ES.	As outlined in the methodology adopted in Technical Appendix 5.1: Landscape & Visual Impact Assessment Criteria, the baseline against which the solus effects of the proposed wind farm has been assessed includes all operational wind farms. The primary purpose of the cumulative impact assessment is therefore to consider the additional effects that might arise as a result of the proposed wind farm if the other consented, in planning (awaiting determination) and scoping stage schemes were also operational.

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			Since the cumulative ‘cut-off’ date of 30th June 2023, it is acknowledged that an application for the Twyn Hywel scheme has now been submitted to PEDW and is awaiting validation.
	LVI Night-time assessment	PEDW notes that night-time assessment is not mentioned in the SR. The LVIA should address the potential for wind turbines to give rise to a potential night- time visual impact due to anti collisions lights and need to consider the BBNP’s status as a Dark Sky Reserve.	Air Navigation Order Article 2222 requires turbines exceeding a tip height of 150 m to display aviation lighting to indicate their presence. As the turbines proposed as part of this development have a maximum blade tip height of 149.9 m there is no requirement for aviation lighting.
	Silurian moth <i>Eriopygodes imbecilla</i>	PEDW notes that supporting habitats have been identified on Site but they are not shown in the SR. It is noted at paragraph 6.23 of the SR that there are no records of Silurian moth within 2 km of the Site. It is noted that the Applicant does not intend to complete a detailed assessment for Silurian moth but it is unclear whether this approach has been agreed with TCBC. A clarification is sought in the ES.	Silurian moth is confined to land above 450 m altitude where the larval foodplant (bilberry <i>Vaccinium myrtillus</i>) and a deep moss layer (in which the caterpillars hide during the day) are present. There is very little land above the 450 m contour at Mynydd Maen, and the Site is outside the known range of the species in the UK (the most southerly record is for Twyn Du and was of a caterpillar recorded by BSG Ecology staff in spring 2023 - this was at higher elevation (c. 550 m) and approximately 5 km to the north). Liaison with Butterfly Conservation staff and a review of published literature (Tordoff & Williams, 2018) in which the Site was scoped out of searches to establish the range of the species were considered in discounting the need to survey for the species. The approach was discussed with both Torfaen and Caerphilly CBCs and a record is contained in the meeting notes in Technical Appendix 6.2: Stakeholder Meeting Records.
	SSSIs	There is not enough information provided in the SR to scope out Ty’r Hen Forwyn SSSI at this stage, therefore the site is provisionally scoped in. PEDW agrees that the two geological SSSIs identified within 5 km of the Site can be scoped out.	Further information with regard to all statutory designated sites within 10 km of the proposed Mynydd Maen wind farm is included within Chapter 6: Ecology, and an assessment of likely impacts presented.

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	Hazel dormouse <i>Muscardinus avellanarius</i>	The SR states that the habitats present within and adjacent to the Site are not considered to be supportive to dormice. However the access road is surrounded by hedgerows and trees and has not been assessed during the Phase 1 habitat surveys. Works to the access road may affect dormice supportive habitats and thus further assessment on dormice is not scoped out of the EIA process. Further survey work will need to be conducted at the appropriate time of the year and the results reported in the ES. See also NRW comments at Appendix 1 ¹ . Additionally, the Applicant is reminded that heath and bracken, although suboptimal, can offer nesting opportunities for dormice.	Dormouse surveys have been completed in relation to the trees and hedgerows along the access road. These are detailed in this chapter. Dormouse was not recorded. Habitat within the wind farm is mostly relatively short heather <i>Calluna vulgaris</i> -dominated habitat, but around the fringes of the Site (on the downslopes) bracken stands and mature heather are present. A non-licensed method statement will apply to any works affecting these areas, and will be delivered as part of the Construction Environmental Management Plan (CEMP).
	Great crested newts (GCN) <i>Triturus cristatus</i>	The SR states that GCN were found to be present within the Site. It is unclear how the surveys were conducted, for example the SR does not clarify whether 6 visits to assess population size were completed. This should be clarified in the ES and the assessment should be accompanied by a full set of mitigations. It is understood that the surveys were conducted in 2021. The application should be mindful of the CIEEM guidance on the lifespan of ecological surveys and reports.	A full account of the approach to GCN surveys is provided in Chapter 6: Ecology, along with mitigation. Survey work has followed industry standard guidance for establishing presence / absence and population size. Additional survey has been completed due to NRW's apparent lack of comfort in negative eDNA results in demonstrating absence where a negative result has been returned. All work to inform the application has been completed and / or refreshed in 2022 and 2023.
	Reptiles	Mitigation measures to prevent harm to reptiles during construction should be included in the ES	Mitigation measures to prevent harm to reptiles during construction have been set out within Chapter 6: Ecology.
	Badger <i>Meles meles</i>	The SR states that no setts or other evidence of badgers was found on Site. However, PEDW is unable to find in the SR when the Phase 1 Habitat survey was conducted. If the Phase 1 Habitat survey has been carried out at a suboptimal time, it may not be possible to conclude that there were no signs of	The timing of the Phase 1 survey (and update Phase 1 survey) are detailed within Chapter 6: Ecology. Badger signs were not recorded during these or any other ecological or ornithological survey work. A repeat survey will be completed prior to construction to ensure the baseline remains the

¹ This is a reference to Appendix 1 of the scoping response.

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		badger activity. A repeat survey may be required. Mitigation measures should be included in the ES.	same and there are no potential licensing issues to consider. Mitigation to ensure legislative compliance is included within Chapter 6: Ecology.
	Section 7 habitats and species. Phase II vegetation survey	The SR does not state how impacts on Section 7 habitats and species will be avoided. At this stage it is unclear how this will be achieved as only a Phase 1 habitat survey has been conducted. Due to the presence of the priority habitats identified, additional vegetation surveys are required. The Phase II vegetation survey can be designed to follow the methodology described by Rodwell, J. S. (2006). National Vegetation Classification: Users' handbook. Representative quadrats should be selected taking into consideration not only the final locations of the turbines (including micro-siting) but associated infrastructure and construction areas including borrow pits if relevant. The survey results should inform the assessment of the potential impact on non-statutory designated sites. See also RTCBC comments at Appendix 1.	All plant communities have been recorded to NVC level and assessed against Annex 1 and Section 7 priority habitat criteria. The identification of botanically sensitive areas has been used to inform the design as opposed to being considered retrospectively. The site is largely located in acid grassland / dry heath mosaic and agriculturally improved habitats. It is assumed that the reference to RTCBC is in error, as there are no comments from Rhondda in Appendix 1 of the document, and it is unclear why that authority would comment on an application in Torfaen and Caerphilly.
	Bats (activity surveys)	The SR states that the "Scottish Natural Heritage (2019) Bats and onshore wind turbines - survey, assessment and mitigation. NatureScot, Inveness" guidance will be followed but it is noted that no transect surveys of vantage point surveys are proposed. The Applicant is reminded that the most up to date guidance is the NatureScot guidance "Bats and Onshore Wind Turbines - survey, assessment and mitigation (August 2021). The SR states that "it is otherwise left to the professional judgement of the consultant to advise what complementary surveys are appropriate." However, the guidance is clear that these survey methods are there to complement the information gathered from static detectors. Transect surveys should be conducted at the appropriate time of the year.	The update to the guidance is noted. Scoping text was drafted considerably in advance of the submission of the scoping report. There were few material changes to the guidance as a result of the update, and none that were relevant to the scope of work. PEDW are incorrect in their assertion. Neither walked transect nor vantage point work are requirements for baseline survey to inform wind farm assessments. Both should be applied on a discretionary basis where they might add information to help address a question that has emerged from the data collection process). This is what the guidance indicates. BSG Ecology was closely involved in the steering group that developed the current industry standard guidance for bat surveys at proposed wind farms (NatureScot <i>et al.</i> , 2021). One of the

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		PEDW notes that the access route will require upgrade works but this has not been considered during the Phase 1 Habitat survey. Should trees be affected by the works, these should be assessed for bat roost potential and surveys be conducted appropriately. See also NRW comments at Appendix 1.	aims of this guidance was to ensure survey work was focused on understanding and assessing impacts, and the move away from transects as a core part of pre-application survey reflected their (typically) very limited value in informing baseline characterisation and assessment work. Vantage point surveys have always been discretionary. No clear driver for transect or vantage point has been identified for Mynydd Maen. Trees close to the access route have been subject to ground level tree inspections and close inspections to determine their potential to support bats.
	Bats (risk of collisions)	PEDW does not have the expertise to advise on this matter and thus it is recommended that the applicant continues to engage with NRW and relevant LPAs once the baseline surveys are complete and the model prepared. As this is a highly technical subject, the applicant may want to explore the possibility of engaging the relevant parties with the preparation of Statements of Common Ground.	Collision of bats has been assessed in this report. RES are open to engaging with local authorities on this and other ecological issues to secure common ground. Engagement with NRW outside of the scoping process has not been possible to date.
	Otter <i>Lutra lutra</i> and water vole <i>Arvicola amphibius</i>	PEDW agrees with the proposed survey approach.	No comment required.
	Pine marten <i>Martes martes</i>	See comment on pine marten at Appendix 1.	NRW noted the need to consider pine marten in the event of removal of woodland. There will be no woodland lost as a result of the proposed wind farm.
	Peat and Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	The SR does not mention the potential for GWDTEs to be affected by the proposal even though there is potential for peat deeper than 0.5 m to be present. The ecological assessment should consider GWDTEs, with reference to the hydrological assessment.	GWDTEs have been considered within Chapter 6: Ecology and Chapter 9: Hydrology & Hydrogeology. There has been an ecohydrologist within the project team.
	Approach to Mitigation (Ecology)	No details are available at this stage in terms of mitigation and enhancement, but the ES should include a detailed ecological management plan,	Mitigation proposals are set out in this document. The EclA process involves characterising the baseline, identifying

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		including targets and enhancement objectives specific to the habitats and species present on site. The plan should include monitoring [see Section 8 of the NatureScot guidance “Bats and onshore wind turbines - survey, assessment and mitigation (August 2021)] and indicate triggers which would prompt changes in the management of the site. Net benefits should be clearly identified. At this stage, PEDW is not in a position to provide further recommendations for the delivery of specific mitigations. It is recommended that relevant consultees are further engaged once a draft mitigation proposal is emerging.	important features and assessing impacts. Wherever possible impacts will be avoided or minimised, and the significance of residual effects assessed. An ecological enhancement plan would be included in a subsequent document prepared and agreed with the Local Planning Authorities post-consent that will set out how the project will deliver biodiversity net benefit in accordance with Welsh planning policy. Monitoring requirements will be driven by the conclusions of the ES. They are likely to include monitoring of habitat change to detect whether management is effective and work is delivering against objectives. Monitoring commitments should not pre-empt the assessment.
	Vantage Point survey	PEDW notes that the survey conducted in 2020 / 2021 does not include migration periods (July to October). No justification is provided in the scoping report to explain this limitation. The exclusion of these months in the survey effort may have resulted in an underestimation of the potential presence of waders and migratory wildfowl. PEDW agrees with the concern expressed by NRW.	In the absence of consultation with NRW, Vantage Point (VP) survey was completed in August - September 2022 in order to confirm predictions regarding target species movements in these months. VP work was conducted during July and October in both years of survey, as part of the (breeding season and winter survey work respectively). In combination these cover the migration period highlighted.
	Designated sites (Ecology)	The potential effects of the Proposed Development on wintering wildfowl population at Llandegfedd Reservoir SSSI should be considered as part of the assessment.	Potential effects on the Llandegfedd Reservoir SSSI have been considered within Chapter 7: Ornithology.
	Approach to mitigation (Ecology)	No details of mitigation or enhancement are available at this stage but the Environmental Statement (ES) should include a detailed ecological management plan, including targets an enhancement objectives specific to the habitats and species present on-site. The plan should include monitoring and indicate triggers which would prompt changes in the management of the Site. Any net benefits should be clearly identified.	Mitigation proposals are set out within Chapter 6: Ecology. An ecological enhancement plan would be included in a subsequent document prepared and agreed with the Local Planning Authorities post-consent that will set out how the project will deliver biodiversity net benefit in accordance with Welsh planning policy.

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			Monitoring requirements will be driven by the conclusions of the ES and the aims of the biodiversity net benefit proposals. They are likely to include monitoring of habitat change to detect whether management is effective, and work is delivering against objectives. Monitoring commitments should not pre-empt the assessment.
	Cumulative Assessment (Ecology)	As set out in section 6 of the Scoping Direction, the Applicant is strongly advised to include relevant DNS schemes that have reached the EIA scoping stage in the assessment of cumulative effects for this ES.	The cumulative assessment considers relevant DNS schemes that have reached the EIA scoping stage.
	Targeted Wader Survey (Ornithology)	A single year of wader surveys may be acceptable given the lack of records during the first year. However, the site is within 5 km of the Usk Catchment and Llangorse Lake Important Curlew Area as stated in Wales Action Plan for the Recovery of the Curlew. Therefore, if wader activity is noted around the site, further targeted survey for these species should be reconsidered.	No evidence of breeding waders (including curlew) was recorded during any of the survey work, including the targeted breeding wader surveys during the first year of survey. Therefore, no further targeted survey for breeding waders was completed.
	Receptors (Ornithology)	Ecological receptors such as birds should be considered as part of the assessment, both during construction and operations. The results of these assessments should be addressed appropriately in the ecological assessment.	The effects of the proposed wind farm on ecological receptors during construction and operation are considered within Chapter 6: Ecology and Chapter 7: Ornithology.
	Cumulative impacts (Ornithology)	Please see section 6 of this Scoping Direction and Consultees responses.	An assessment of cumulative effects in terms of access routes for construction traffic caused by other proposed developments that are in close proximity to the site is included in Chapter 10: Traffic, Transport and Access.
	Baseline & Unrecorded Assets (Cultural Heritage)	As noted by Cadw, the potential for archaeological assessments should not be discounted prior to the results of the desk-based and walkover surveys being known and understood. The applicant is encouraged to consult with the Glamorgan and Gwent Archaeological Trust.	The approach to desk study, survey work and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 8: Cultural Heritage. For example, assessment on the archaeological potential of the site has been carried out in line with the procedures set

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		<p>It is recommended that the baseline collection be carried out in accordance with the "Standards and Guidance for Desk-Based Historic Environment Assessment" produced by the Chartered Institute for Archaeologists and this should include consulting documentary, cartographic, aerial photographic and Lidar information. A walkover survey should also be carried out after the desk- based work in order to clarify the evidence produced during that phase of the study. It is also expected that a geophysical survey will be carried out in the areas surrounding the proposed turbine bases, in order to provide additional information and to assist micro siting at a later stage. There may also be a need for archaeological evaluation (trial trenching) to be carried out to confirm the nature and significance of archaeological sites which have been identified.</p>	<p>out in 'Standard and Guidance for Historic Environment Desk-based Assessment'. The assessment has included use of information held by the Glamorgan and Gwent Archaeological Trust, the National Monuments Record of Wales, the Glamorgan Archives, the National Heritage List for Wales, and various online sources as well as aerial photography, Lidar data and site visits to identify historic assets within the study areas.</p> <p>Archaeological evaluation would be undertaken on the areas of proposed construction works using trial trenches in advance of the development commencing. However, geophysical survey of the proposed wind farm is not considered appropriate in this case due to the topography and vegetation cover across the site as being a mix of vegetation cover and with numerous tracks crossing through.</p>
	Study area (Cultural Heritage)	<p>The impact of the windfarm on the settings of the designated historic assets should be assessed in accordance with the guidance given in the Welsh Government document "The Setting of Historic Assets in Wales". The assessment should not be limited to 1km study area.</p>	<p>The approach to desk study, survey work and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 8: Cultural Heritage.</p> <p>Based on the professional judgement of the authors of the chapter and their extensive experience of similar onshore wind energy projects across the UK, the study area to assess designated historic assets includes the site plus a 10 km buffer from its boundary and the study area for historic assets that are not designated includes the site plus a 2 km buffer from its boundary.</p>
	ASIDOHL (Cultural Heritage)	<p>It is unclear whether an ASIDOHL is required in relation to landscape of special historic interest. The</p>	<p>As stated within Chapter 8: Cultural heritage, the proposed wind farm would not directly</p>

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	Hydrology	<p>applicant should liaise with Cadw, who will curate the assessment.</p> <p>The proposed development has the potential to impact on the local water regime both on the surface and underground. A survey of the hydrological features within the site and up to 500m from the site boundary is required. A full hydrological and hydrogeological assessment is required in the Environmental Statement. Groundwater monitoring is required to establish baseline condition before construction. The groundwater monitoring plan should be prepared in consultation with NRW and relevant LPAs. Sufficient information should be included in the Environmental Statement. to provide a detailed baseline of the hydrological regime. Flood Risk can be scoped out of Environmental Statement. Shallow mining may be present. Shallow mining may contain groundwater and the potential effects of the proposal on groundwater need to be assessed. The Environmental Statement should include a Coal Mining Risk Assessment, including risk of subsidence. Areas where peat is greater than 0.5m should be avoided. Peaty areas that cannot be avoided should be surveyed in accordance with the Scottish Government Guidance 'Guidance on Developments in Peatland'. Potential impacts on peat need to be assessed as part of the Environmental Impact Assessment process. The final design of the scheme should be informed by the presence of peat on site. The ecological effects of disturbing peat on site should be addresses in the ecology chapter of the Environmental Statement.</p>	<p>affect any Registered Historic Landscapes Therefore, an ASIDOHL is not required.</p> <p>Issues identified in the scoping response will be covered across this assessment and in Technical Appendix 9.1: Sustainable Drainage Management Plan Report.</p> <p>The risks associated with coal mining are described in Technical Appendix 9.2: Coal Mining Risk Assessment of the ES and related studies presented elsewhere.</p>
	Significance of effects (Acoustic)	<p>The applicant should note that the noise limits set in ETSU-R-97 are not a definition of significance. The applicant is reminded of paragraph 3.2.8 of the Institute of Acoustic Good Practice Guide on the</p>	<p>Details of the consultation undertaken with Caerphilly County Borough Council and Torfaen County Borough Council, informing the detailed</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		application of ETSU-R-97 (2013) which states that single lower fixed limits can be used where background noise levels do not vary significantly between amenity periods and night-time periods, with the agreement of the relevant authorities. The applicant is encouraged to liaise with CCBC and TCBC on the approach to noise assessment. The ES should demonstrate compliance with ETSU-R-97 and clearly explain how significant impacts are identified.	scope of works, are outlined in Table 11.1 within Chapter 11: Acoustic. Compliance of the predicted noise levels of the proposed wind farm with ETSU-R-97, provided that an appropriate operational noise mitigation strategy is put in place, is demonstrated within Chapter 11: Acoustic.
	Shadow flicker	See section 6 of this Direction in relation to the application of ten rotor diameters as a cut off. The ES should provide a clear rationale as to the methodology adopted, and why it is considered appropriate given the scale of turbines proposed.	The methodology adopted in the Shadow Flicker is detailed within Chapter 12: Shadow Flicker and Reflected Light. This shadow flicker assessment is based on turbines with a 117 m rotor diameter and the planning application includes a 50 m micro-siting distance for infrastructure. Analysis has been undertaken for shadow flicker at all properties within 1220 m from any of the 13 wind turbines.
Caerphilly Council	Proposed Development	The following information should also be provided: suitably scaled plans showing the wind farm layout, including the location and details of the wind turbines and all ancillary infrastructure; and scaled detailed plans showing the typical wind turbine footprint, scale, form and appearance and lighting, if necessary.	Figures detailing the proposed wind farm location and infrastructure layout are included within Volume 3: Figures.
	Landscape and Visual Impact Assessment (LVIA)	The exact locations of the viewpoints as shown on the Zone of Theoretical Visibility (ZTV) are, however, difficult to discern due to the scale of the submitted plan in Appendix 3 of the SR. A more detailed ZTV will therefore be required for a 15km study area. This will in turn enable a clearer assessment of the selected viewpoints to be made, including a judgement on whether they are correctly located and/or additional viewpoints are necessary. The more detailed viewpoints plan should cover a 15km radius on a 1:25,000 OS scale plan and be supported with baseline photographs, wireframes and visualisations/photomontages.	A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual. The location of the proposed wind farm and the detailed 24 km study area with selected viewpoints for the LVIA is illustrated in Figure 5.4: Blade Tip ZTV to 24 km with Viewpoints (measured from the outermost turbine).

Consultee	Topic area	Issues raised	Where this is addressed in the ES
	Impact on views (LVIA)	The assessment will also need to consider the effects on sequential views of those experienced by users of the public rights of way network, including long distance walking and cycling routes, within the ZTV. It should be noted that some public rights of way pass through the site and wind turbines will be visible from close, mid and distant range views. As such, the cumulative effect of constantly seeing views of the proposed wind turbines also needs to be addressed	The main assessment identified public rights of way which had the potential to experience significant effects as a result of the proposed wind farm. These are used as the basis for the cumulative assessment within Chapter 5: Landscape and Visual.
	Cumulative Assessment (LVIA)	Particular regard must be had to existing and consented wind turbines at closer distances and in proximity to one another, and instances where receptors view wind turbines from more than one aspect. The study area should be clearly defined at 30km and cumulative ZTVs should also be carried out at a more detailed study area of 15km radius on a 1:25,000 OS scale plan. The cumulative assessment should include wind turbines that are operational, consented and in the planning system. In respect of the latter, the recently submitted DNS wind farm proposals at Mynydd Llanhilleth, Mynydd Abertillery, Mynydd Carn y Cefn and Manmoel should be included within the cumulative assessment. Other large scale energy infrastructure, such as solar parks, should also be considered for inclusion in the cumulative assessment, where appropriate.	All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline within Chapter 5: Landscape and Visual. In order that the assessment remains focused on those other schemes which have the greatest potential to give rise to significant cumulative effects, it was deemed appropriate to focus the assessment on a detailed 24 km area from the proposed wind farm. The cumulative sites within the 24 km detailed study area are illustrated in Figure 5.30: Other Wind Farms within 24 km.
	Residential visual amenity assessment (LVIA)	With regards to residential amenity, a separate residential visual amenity assessment is required, which must be in accordance with The Landscape Institute Technical Guidance Note 2/19 (2019). A study area of 2km will be required as residents are likely to experience potentially significant visual effects within this distance.	Effects on individual properties outside of settlements are considered in the Residential Visual Amenity Assessment in Technical Appendix 5.6. The location of these properties is illustrated in Figure 1 of Technical Appendix 5.6.
	Hydrology & Hydrogeology	There are a plethora of small watercourses found throughout the area which appear to be prone to flooding as well as most of the area showing to be at risk of groundwater flooding.	Development avoids all fluvial flood risk areas. Issues identified by CCBC will be covered across the assessment within Chapter 9: Hydrology & Hydrogeology.

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<p>Most of the site is susceptible to groundwater flooding.</p> <p>CCBC Land Drainage bylaws must be adhered to, namely no construction is permitted within 8m of a watercourse or on the watercourse itself without written consent from the SAB.</p> <p>Recommend guidance: The SUD's Manual C753, Technical Advice Note 15 and the Statutory standards for sustainable drainage systems. SAB process should be started as soon as possible. A site investigation should be carried out to investigate the suitability of SuDS on site, in accordance with the hierarchy found under Standard 1 - Surface Water runoff Destination, of the Statutory Standards for Sustainable Drainage Systems.</p>	
	Traffic and transport	<p>The following should be considered as part of the assessment:</p> <ul style="list-style-type: none"> • Impact on the local highway network during the construction phase; • Any short-term junction/ highway mitigation to accommodate any abnormal loads; • Haul route; • Projected daily vehicle type and numbers; • Full access details into the site; • Swept path analysis of proposed largest vehicle using route and access; • Internal parking/ loading and unloading areas; • Construction staff numbers; and • Provision of a construction traffic management plan. 	<p>An assessment of the effects of construction traffic is included in Chapter 10: Traffic, Transport and Access. Following consent and during discharge of conditions, a Construction Traffic Management Plan (CTMP) will be created to address applicable conditions.</p>
	Guidance (Cultural heritage)	<p>Whilst the identification of Cadw's 'Conservation Principles for Sustainable Management of the Historic Environment Wales' as best practice in Chapter 8 of the SR is welcomed, other relevant advice and guidance that should be considered include Cadw's 'Managing Historic Character in Wales' (May 2017), Cadw's 'Setting of Historic Assets in Wales' (May 2017) and Technical Advice Note 24: The Historic Environment (May 2017).</p>	<p>Table 8.1 within Chapter 8: Cultural Heritage summarises the statutory and planning/policy context (national/regional/local) for assessment work relating to the historic environment in Wales considered in the assessment.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
	Methodology (Cultural heritage)	<p>It is also recommended that any identified impacts on historic assets, such as the setting of Listed Buildings or Scheduled Ancient Monuments, are assessed via, among other things, a form of visual assessment which may include photographs, wireframes and visualisations/photomontages.</p> <p>It is noted that an assessment of archaeological remains will be undertaken. Such an assessment should include an archaeological desk-based assessment to the Standards and Guidance of the Chartered Institute of Archaeologists. The potential need for further archaeological works will depend on the findings of the desk-based assessment. Depending on the nature of such further works it may be appropriate to undertake them pre or post-determination of any future planning application. It is also recommended that all archaeological work is carried out by a registered organisation with the Chartered Institute for Archaeologists, or by a full Member of the Chartered Institute for Archaeologists.</p>	Section 8.4 within Chapter 8: Cultural heritage lists a number of sources of information that have been used in the assessment to identify historic assets within the study areas, including photographs, site visits, and Lidar Data.
	Background Noise Measurements (Noise)	The number and location of baseline noise surveys will need to be agreed and consideration should be given to the need for any cumulative impact assessments.	<p>Background noise measurements were undertaken by RES at five locations neighbouring the proposed wind farm, in accordance with ETSU-R-97 and IOA GPG, and in consultation with the Environmental Health Officers of Caerphilly County Borough Council and Torfaen County Borough Council. The survey locations are as detailed in Table 11.9 within Chapter 11: Acoustic.</p> <p>A cumulative operational noise assessment was completed to determine the potential impact of the proposed wind farm in conjunction with two other potential schemes which are currently at the scoping stage and are located nearby. This is set out within Chapter 11: Acoustic.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
	Contaminated Land	Areas of contamination are known to exist within the proposed site and surrounding area. As such, a contaminated land assessment which considers risks and mitigation requirements for the proposed development may be required. It will, however, only be possible to confirm this requirement when a more definitive and detailed site layout is available.	<p>A report was commissioned to determine the potential impact relating to potential land contamination. Technical Appendix 3.2: Geo-environmental Report (Argyll Environmental) covers the entire proposed wind farm. Relevant information contained in this report is presented in drawing Figure 3.11: Potential Contamination Sources. Measures to prevent pollution are included in Chapter 9: Hydrology & Hydrogeology.</p> <p>A Construction Environmental Management Plan (CEMP) would be prepared once planning consent has been gained. This would be agreed with the Local Authority prior to any construction works taking place and would describe the detailed methods of construction and working practices. The CEMP would detail a number of measures to deal with pollution prevention.</p>
Torfaen County Borough Council (TCBC)	Hydrology & Hydrogeology	Highlighted a spring that runs east into TCBC and Afon Llwyd catchment. Where individual sites or access roads cross or have to divert these an Ordinary Watercourse Consent will be required.	Issues identified by TCBC will be covered across the assessment within Chapter 9: Hydrology & Hydrogeology.
	Acoustic	<p>All applications submitted must include a desktop noise assessment which is specific to the development locality. The desktop noise assessment should contain all the following information;</p> <ul style="list-style-type: none"> • A twelve figure national grid reference for the precise location of the turbine • Identification of the nearest noise sensitive premises and details of their respective distances from the proposed development. Property that is in ownership of the applicant should also be included. A statement should be 	<p>Information regarding the precise locations of the turbine and nearest residential properties to the turbines are included within Chapter 11: Acoustic, paragraphs 11.5.28 and 11.5.29.</p> <p>The candidate turbine model for the proposed wind farm is the Vestas V117 4.2 MW turbine with a hub-height of 91.5 m and serrated trailing edge (STE) blade modifications.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<p>provided as to whether any properties in ownership of the applicant are let to third parties.</p> <ul style="list-style-type: none"> • The make, model, hub height, declared apparent emission sound power level and rotor diameter of the proposed turbine. • The most recent turbine-specific noise report (usually supplied by the turbine manufacturer) providing information on the derivation of the sound power level of the turbine, including the level of uncertainty and information on tonality. <p>A site specific desk top study should be undertaken to demonstrate that the wind turbine will not exceed the large turbine noise condition, which is noise from the proposed turbine(s) (inclusive of any tonal element) shall not exceed 35 dBLA90, 10 min as measured 3.5 meters from the façade of any noise sensitive property at any time, up to on-site wind speeds of 10 m/s measured at a height of 10m. Where the site specific desk top study demonstrates that the proposed wind turbine(s) do not meet the large turbine condition, then the applicant has the alternative to undertake and submit a site specific noise assessment.</p> <p>A site specific noise assessment should include all the requirements detailed above for the desktop study with the additional information:</p> <ul style="list-style-type: none"> • A detailed background noise survey. Locations and details of which should be discussed and agreed with the local planning authority. • Predicted turbine(s) noise levels at the noise sensitive properties. 	<p>The sound power levels of the candidate turbine model have been taken from specification documents provided by a potential manufacturer and an appropriate level of uncertainty has been applied to the supplied values (i.e. in line with the Good Practice Guide to ETSU-R-97). Whilst it is not expected that tones will be generated by the potential turbines, this will be controlled via planning condition. A warranty will also be sought that further restricts the potential for tonal noise and allow for appropriate recourse with the manufacturer should the installed turbines have any tonal character in practice.</p> <p>A site specific noise assessment, with detailed background noise survey, is detailed within Chapter 11: Acoustic.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<ul style="list-style-type: none"> • Noise limits specified in ETSU-R-97 and the difference between the predicted noise levels and ETSU-R-97 derived noise limits. • Background Noise Measurements 	
		<p>A modelled assessment detailing the predicted level of turbine noise for each identified receptor for all wind speeds up to and including;</p> <p>Small Wind Turbines Large Turbines Indices LAeq, T LA90, 10 minutes Wind Speeds Up to and including wind speeds of 8 m/s at rotor centre height Up to and including wind speeds of 10 m/s at 10m height</p>	<p>Predicted operational noise levels for any given wind direction resulting from the introduction of the proposed wind farm operating in isolation at the nearest residential properties is included in section 11.7 within Chapter 11: Acoustic.</p>
		<p>Where multiple small or large turbines are proposed, a desktop noise assessment must be submitted that demonstrates that the cumulative noise emissions from the turbine will not exceed the noise limits specified in the small or large wind turbine condition.</p> <p>Identification of existing turbines, consented turbines and any turbines currently the subject of an application or screening opinion within a 2 kilometre radius of the proposed development, including their respective distance to the proposed development and any likely cumulative noise impact.</p>	<p>A cumulative operational noise assessment was completed to determine the potential impact of the proposed wind farm in conjunction with two other potential schemes which are currently at the scoping stage and are located nearby. This is set out within Chapter 11: Acoustic.</p>
	<p>Aggregate resources</p>	<p>As regards the aggregate resource (PSV Pennant Sandstone), the potential for extraction will need to be considered, taking into account the regional context of aggregates supply and demand and also the need for renewable energy generation in the light of meeting Welsh Governments' climate change commitments.</p>	<p>The potential for extraction of aggregates, or mineral products, in the area, is addressed within Chapter 14: Socioeconomics.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
	Landscape and Visual Impact (LVIA)	Agreed viewpoints may need further consideration. Photomontages of certain key views may be required.	A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual. Visualisations were produced for each of the viewpoints; these are presented in Volume 3. An explanation of how they were produced and information to be read in conjunction with the visualisations is provided in Technical Appendix 5.2.
	Cumulative assessment (LVIA)	Due to the significant potential for cumulative impact and consequential constraints to the amount of renewable energy that could be generated within Torfaen, we would suggest that the following need to be considered, regardless of their stage in development/ gaining consent: DNS 3278009 Abertillery Wind Farm 7 x 180 metre turbines (north of site) DNS 3273368 Mynydd Llanhilleth Wind Farm 12 x 180 metre turbines (north of site) DNS 3270299 Mynydd Carn Y Cefn 8 x 180 metre turbines (west of site)	All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline within Chapter 5: Landscape and Visual. In order that the assessment remains focused on those other schemes which have the greatest potential to give rise to significant cumulative effects, it was deemed appropriate to focus the assessment on a detailed 24 km area from the proposed wind farm. The cumulative sites within the 24 km detailed study area are illustrated in Figure 5.30: Other Wind Farms within 24 km.
	Ecology	All further required survey work must be undertaken in line with the recommendations set out in the report, in accordance with accepted survey methodologies and the reports must include recommendations for any required mitigation and enhancements.	The approach to desk study, survey work and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 6: Ecology and Chapter 7: Ornithology. Mitigation proposals are set out in the assessment. The EclA process involves characterising the baseline, identifying important features and assessing impacts. Wherever possible impacts will be avoided or minimised, and the significance of residual effects assessed.

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			<p>An ecological enhancement plan would be included in a subsequent document prepared and agreed with the Local Planning Authorities post-consent that will set out how the project will deliver biodiversity net benefit in accordance with Welsh planning policy.</p>
<p>Natural Resources Wales (NRW)</p>	<p>Hydrology & Hydrogeology</p>	<p>Notes that the proposed development has the potential to impact the local water regime both on the surface and underground. Requests that a survey of hydrological features within the site and up to 500m from site boundaries is required. Notes that the proposal has the potential to impact existing water flows and quality during construction and decommissioning. Requires groundwater monitoring to establish baseline condition before construction. Reference provided to various pollution and hydrology guidelines on the NRW website. Reference provided to document Assessing the impact of wind farm developments on peatlands in Wales, Countryside Council for Wales. Advised to avoid deep peat and address the effects of the wind farm on peat hydrology.</p>	<p>Issues identified will be covered across the assessment within Chapter 9: Hydrology & Hydrogeology and in Technical Appendix 9.1: Sustainable Drainage Management Plan Report.</p>
	<p>Construction Environmental Management Plan (CEMP)</p>	<p>The Outline CEMP should be created following a thorough desk study and field surveys and comply with all relevant Guidance for Pollution Prevention. To ensure the effectiveness of the Outline CEMP, a water quality monitoring plan should be incorporated into the CEMP to manage any effects on water quality during the construction phase of the proposal.</p>	<p>A detailed Site Construction Environmental Management Plan (CEMP) would be developed in consultation with stakeholders to build on the principles of the outline CEMP submitted as part of this planning application. This would include the application of best practice in accordance with Sustainable Drainage (SUDS) Statutory Guidance (Welsh Government, 2019) and NRW et al (2018) guidance and Scottish Environmental Protection Agency (SEPA) Guidance for Pollution Prevention (GPP). A Construction Environmental Management Plan (CEMP) would be prepared once planning consent has been gained. This would be agreed with the Local Authority prior to any</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
			<p>construction works taking place and would describe the detailed methods of construction and working practices. The CEMP would detail a number of measures to deal with pollution prevention.</p>
	Cultural heritage	<p>Reference is made to the Blaenavon Industrial Landscape World Heritage Site (WHS), 10km to the north. The WHS overlaps with the BBNP and with the Blaenavon Registered Historic Landscape. The Glamorgan Gwent Archaeological Trust should be consulted with regard to the Registered Historic Landscape and Cadw on the WHS.</p>	<p>Section 8.3 within Chapter 8: Cultural heritage states that Glamorgan Gwent Archaeological Trust (GGAT) were consulted on the scope of the assessment and the methodologies to be used. Consultation with Cadw has not been undertaken as the proposals will not directly affect any designated historic environment assets, nor will it affect any Registered Historic Landscapes. The methodology used for the assessment follows guidelines used in similar projects where Cadw have been consulted.</p>
	Landscape and Visual Impact Assessment (LVIA),	<p>Reference is made to the National Landscape Character Area (37 South Wales Valleys), LANDMAP, BBNP and Wye Valley AONB. Reference should also be made to the BBNP Management Plan and Special Qualities and to the BBNP Landscape Character Assessment and Supplementary Planning Guidance. Reference is made to Scottish Natural Heritage (SNH) Visual Representation of Wind Farms and the initial Search Area would be 45km radius from the outermost turbines, based on this. Reference is made to LANDMAP Guidance Note 3. Please note that this has been replaced with Natural Resources Wales (NRW) Guidance Note 46 (GN46), which recommends a 23-26km Search Area and 20-24km Study Area for turbines of 146-175m. It is usual to include occasional high sensitivity receptors just beyond the Search Area in an assessment.</p> <p>We advise that additional viewpoints within the BBNP should be included, given the sensitivities. Cefn y Ystrad Trig lies approximately 23km away, Mynydd Llangatwg Trig approximately 18km away, Mynydd Garn summit approximately 7km away and</p>	<p>Reference to the BBNP Management Plan 2023 - 2028 is made within Chapter 5: Landscape and Visual.</p> <p>A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual.</p>

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		<p>the war memorial in Pontypool Park approximately 6km away. These first three viewpoints are within open access land with nearby public footpaths and the war memorial is a viewpoint within a public park (Registered Historic Park}.</p>	<p>Viewpoint 24 is located at Pen y Fan, within Brecon Beacons National Park.</p>
	Cumulative assessment	<p>There are potential cumulative effects from other wind farms and the proposal within the search area. The Cumulative Landscape and Visual Impact Assessment Search Area should be slightly larger than the LVIA Study Area, to include large wind turbine developments.</p> <p>We advise that, in accordance with Landscape Institute TGN 06/19 Visual Representation of Development Proposals, Type 4 representations with photomontages should be provided for viewpoints within the BBNP, given the sensitivities. Cumulative photomontages/wirelines should also be produced illustrating cumulative effects on the BBNP.</p>	<p>All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline within Chapter 5: Landscape and Visual.</p> <p>In order that the assessment remains focused on those other schemes which have the greatest potential to give rise to significant cumulative effects, it was deemed appropriate to focus the assessment on a detailed 24 km area from the proposed wind farm. The cumulative sites within the 24 km detailed study area are illustrated in Figure 5.30: Other Wind Farms within 24 km.</p> <p>A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual. Viewpoint 24 is located at Pen y Fan, within Brecon Beacons National Park.</p>
	Ecology	<p>Llandegfedd Reservoir SSSI, notified for its population of over-wintering birds, should be scoped in. We note this SSSI is referred to in Chapter 7 (Ornithology) but not Chapter 6 and we provide further advice on Ornithology below. We advise the impact on and potential effects of the proposal on the special features of Llandegfedd Reservoir SSSI is incorporated into the ES.</p> <p>The EIA for this development should include sufficient information to enable the local planning authority to determine the extent of any environmental impacts arising from the proposed</p>	<p>An assessment of likely impacts with regard to all statutory designated sites within 10 km of the proposed Mynydd Maen wind farm, including Llandegfedd Reservoir SSSI, is considered within Chapter 6: Ecology .</p> <p>A full account of the approach to surveys for protected species is provided in Chapter 6: Ecology and Chapter 7: Ornithology.</p> <p>Survey work has followed industry standard guidance.</p>

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	Proposed Development	<p>scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.</p> <p>We would expect the description to include:</p> <ul style="list-style-type: none"> • The purpose and physical characteristics of the proposals; • Location, development size and configuration of the development including flexibility of the site layout; • Land use requirements and other physical features of the project; • Procedures for good working practices; • Resource use, including waste, minerals and energy; • Identification of appropriate pollution contingency and emergency measures; • Timing of all works and contingency plans should slippage in the programme occur; • Details of construction works including methodology, location and extent of construction sites, construction access/working corridors and stock piling sites; • Quantity and content of any discharges from the development site; • Details of source, type and quantity of any filling material required; • Details of the disposal of any surplus material e.g. material displaced from constructing bases or access roads. • Maintenance requirements of structures. • Maintenance of any habitats within the site; • Details of access routes/transport links, alterations to traffic flows, including the type and frequency of vehicles, noise and dust levels; • Details of grid connection; • Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure. 	<p>A complete description of the proposed wind farm, including activities during construction, operation, and decommissioning, is provided in Chapter 3: Proposed Development.</p>

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		Any maps, drawings and illustrations that are produced to describe the project should be designed such that they can be overlaid maps, drawings and illustrations produced for other sections of the EIA such as biodiversity.	Figures 1.1 to 3.11 are included in Volume 3: Figures, which illustrate the design of the proposed wind farm.
	Ecology & Ornithology	The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with an assessment of the significance of any likely impacts.	Chapter 6: Ecology of the Environmental Statement evaluates the effects of the proposed wind farm on terrestrial ecology and complements the assessment of ecological effects presented in Chapter 7: Ornithology. The chapters describe the methods used to evaluate the ecological interest of the Site and to determine the nature conservation importance of this interest. They explain the ways in which birds and ecological features may be affected by the proposed wind farm and assesses the likely effects of the proposed wind farm and their significance.
	Phase 1 Habitat Survey	A Phase I survey of the site should be undertaken to describe and map the key habitats of the site and species of particular importance. This should be undertaken in accordance with the NCC Phase 1 survey guidelines (NCC (1990). Handbook for Phase 1 habitat survey. NCC, Peterborough) and should be undertaken and completed during the summer to ensure the best chance of identifying the habitats present.	As stated in Chapter 6: Ecology, a Phase 1 habitat survey was carried out in July 2020 and updated in August 2022. A Phase 1 habitat survey of the access route was completed in April 2022. The survey was based on industry standard guidance and involved identifying habitats in the field based on the descriptions and indicator species in the Handbook for Phase 1 Habitat Survey (JNCC, 2010).
	Protected Species	We advise all areas likely to be affected by the proposals including the associated infrastructure works (e.g. grid connection corridor and access roads) should be comprehensively assessed for their potential to support protected species. Surveys for protected species should be undertaken by suitably qualified, experienced and where necessary, licensed surveyors in accordance with published guidance, where this exists, and best practice.	A full account of the approach to surveys for protected species is provided in Chapter 6: Ecology and Chapter 7: Ornithology. Survey work has followed industry standard guidance for establishing presence / absence and population size.

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	Bats	<p>If there are any individual trees within the red line boundary, we advise that these are assessed for their potential to support roosting bats through the use of ground-based visual observations and aerial inspections using endoscopes in accordance with the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists. Good Practice Guidelines (3 Edition)'. We would advise that any woodland included within the site boundary would merit the deployment of additional static detectors to assess bat activity in those areas if they will be affected by the siting of wind turbines or works to facilitate site access or grid connection. We strongly encourage that the Ecobat tool in the Nature Scot guidance is used to assess the level of risk that the development poses to bats.</p>	<p>At the current time, the EcoBat tool is not being maintained and has not been available for use since 2022. For this reason it has not been used to inform the assessment within Chapter 6: Ecology. A categorisation of bat activity has instead been derived through comparison with bat activity data collected by BSG Ecology at 52 other sites across England, Wales and Scotland.</p>
	Great Crested Newts	<p>We advise that further surveys would be needed in accordance with published best practice guidance ('Great Crested Newt Mitigation Guidelines' by English Nature (2004)) to determine the population of great crested newts concerned.</p>	<p>A full account of the approach to GCN surveys is provided in Chapter 6: Ecology along with mitigation. Survey work has followed industry standard guidance for establishing presence / absence and population size. Additional survey has been completed due to NRW's apparent lack of comfort in negative eDNA results in demonstrating absence where a negative result has been returned. All work to inform the application has been completed and / or refreshed in 2022 and 2023.</p>
	Water voles	<p>With further surveys proposed for water voles, we advise that the EIA reports on the results of those surveys and scopes in water voles into the assessment of potential effects of the proposals. As indicated above for GCN, all potential effects of the proposals on the species should be considered. This may necessitate the consideration of additional effects to those listed in Table 4. We also advise that all watercourses are appropriately buffered from development works.</p>	<p>As stated in Chapter 6: Ecology, no evidence of water vole was recorded during the survey visits to the main site or the survey of the access route watercourse. Water voles are considered to be absent from the Site and are scoped out of further assessment.</p> <p>As outlined within Chapter 2: Design Evolution and Alternatives within the ES, a buffer of 50 m was applied to infrastructure and construction activity from all watercourses within the site.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
	Otters	Our comments for otters are as above for water voles; we welcome that further surveys for otters will be undertaken and advise that the EIA reports on the results of those surveys and scopes in otters into the assessment of potential effects of the proposals. All potential effects of the proposals on the species should be considered. We also advise that all watercourses are appropriately buffered from development works.	A full account of the approach to Otter surveys is provided in Chapter 6: Ecology. Survey work has followed industry standard guidance for establishing presence / absence and population size. All work to inform the application has been completed and / or refreshed in between 2020 and 2023 inclusive. As outlined within Chapter 2: Design Evolution and Alternatives of the ES, a buffer of 50 m was applied to infrastructure and construction activity from all watercourses within the site.
	Dormice	Providing that the proposals do not involve the removal of woodland, then we could agree to dormice being scoped out. If that is not the case then we advise that surveys for dormice are undertaken (in accordance with Dormouse Conservation Handbook (2 nd Ed) by English Nature (2006)) and the species is scoped into the assessment with all potential effects of the wind farm on the species being considered.	Dormouse surveys have been completed in relation to the trees and hedgerows along the access road. These are detailed in this chapter. Dormouse was not recorded. Habitat within the wind farm is mostly relatively short heather <i>Calluna vulgaris</i> -dominated habitat, but around the fringes of the Site (on the downslopes) bracken stands and mature heather are present. A non-licensed method statement would apply to any works affecting these areas, and would be delivered as part of the Construction Environmental Management Plan (CEMP).
	Pine Marten	If the proposals will affect woodland areas we also advise that surveys for pine marten are undertaken and the species is scoped in to the assessment. We recommend that den boxes and baited feeding stations are deployed at selected locations in suitable habitat on transects across the site. The surveys should cover all seasons, with camera traps deployed to observe activity at the den boxes and feeding stations. We recommend that scat surveys are also used, with samples DNA tested to confirm species.	There would be no woodland lost as a result of the proposed wind farm.
	Protected species	Should protected species be found during the surveys, information must be provided identifying the species specific impacts in the short, medium	A full account of the results of the surveys for protected species is provided in Chapter 6: Ecology.

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<p>and long term together with any mitigation and compensation measures proposed to offset the impacts identified.</p> <p>Where proposals implicate protected species which are also notified features of designated sites (E.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from both perspectives.</p> <p>We advise that the EIA sets out how any long term mitigation or compensation will be secured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA.</p>	<p>Mitigation proposals are set out in this document. The EclA process involves characterising the baseline, identifying important features and assessing impacts. Wherever possible impacts would be avoided or minimised, and the significance of residual effects assessed.</p> <p>Monitoring requirements would be driven by the conclusions. They are likely to include monitoring of habitat change to detect whether management is effective and work is delivering against objectives. Monitoring commitments should not pre-empt the assessment.</p>
	European Protected Species	<p>Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).</p>	<p>Consideration for the requirement of A European Protected Species mitigation licence for great crested newt is included in Chapter 6: Ecology. This would accompany a detailed mitigation strategy to minimise the risk of effects on the species alongside measures to enhance newt habitats. The implementation of the strategy would be overseen by a licensed ecologist</p>
	Local Biodiversity Interests	<p>NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (Eg. bat groups, mammal groups).</p>	<p>Existing records for protected and priority species were obtained from the South-East Wales Biodiversity Records Centre (SEWBReC). SEWBReC data obtained for the Site and surrounding area includes information sourced from numerous local ecological interest groups and local naturalists and consultants who are members of these groups.</p>
	Securing Biodiversity Enhancement	<p>NRW advise that, in accordance with the Environment (Wales) Act 2016 and Planning Policy Wales, the application demonstrates how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience. We advise that the development is designed to allow</p>	<p>An ecological enhancement plan will be included in a subsequent document prepared and agreed with the Local Planning Authorities post-consent, that will set out how the project would deliver biodiversity net benefit in accordance with Welsh planning policy.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		protected species to continue to inhabit the site and move through it.	
	Ornithology	<p>NRW have concerns that passage/wintering waders have been scoped out without justification as to why Vantage Points (VP) did not cover the passage period (July to October).</p> <p>As advised in our review of Chapter 6 Ecology, we consider that Llandegfedd Reservoir SSSI, which is notified for its population of over-wintering birds, should be scoped in. Potential effects on birds and their movements from Llandegfedd Reservoir SSSI to the zone of influence of this development should be considered or further justification is provided as to why VP surveys have not been conducted to cover July to October which is a period of passage for all wildfowl and waders.</p>	<p>In the absence of consultation with NRW, Vantage Point (VP) survey was completed in August - September 2022 in order to confirm predictions regarding target species movements in these months. VP work was conducted during July and October in both years of survey, as part of the (breeding season and winter survey work respectively). In combination these cover the migration period highlighted.</p> <p>Potential effects on the Llandegfedd Reservoir SSSI have been considered within Chapter 7: Ornithology.</p>
CADW	Initial survey work (Cultural Heritage)	CADW recommend that the initial work should be carried out in accordance with the "Standards and Guidance for Desk-Based Historic Environment Assessment" produced by the Chartered Institute for Archaeologists and this should include consulting documentary, cartographic, aerial photographic and Lidar information.	Paragraph 1.12 of Technical Appendix 8.2: Historic Environment Desk Based Assessment (HEDBA) confirms that the assessment is in accordance with Chapter 6 of Planning Policy Wales, Planning Policy Wales Technical Advice Note 24 and the procedures set out in ClfA's 'Standard and Guidance for Historic Environment Desk-based Assessment', while paragraph 8.4.5 of Chapter 8: Cultural heritage of the ES lists the sources of information used to identify historic assets within the study areas.
	Walkover survey (Cultural Heritage)	A walkover survey should also be carried out after the desk-based work in order to clarify the evidence produced during that phase of the study. It is also expected that a geophysical survey will be carried out in the areas surrounding the proposed turbine bases, in order to provide additional information and to assist micro siting at a later stage. There may also be a need for archaeological evaluation (trial trenching) to be carried out to confirm the nature and significance of archaeological sites which have been identified.	<p>Paragraph 8.4.5 of Chapter 8: Cultural heritage of the ES lists the sources of information used to identify historic assets within the study areas.</p> <p>Section 8.6 of Chapter 8: Cultural heritage explains that the first phase of works would be an archaeological evaluation undertaken on the areas of proposed construction works using trial trenches in advance of the development commencing.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
			<p>Geophysical survey of the proposed wind farm is not considered appropriate in this case due to the topography and vegetation cover across the site as being a mix of vegetation cover and with numerous tracks crossing through.</p>
	<p>Assessment guidance (Cultural Heritage)</p>	<p>The impact of the windfarm on the settings of the designated historic assets should be assessed in accordance with the guidance given in the Welsh Government document "The Setting of Historic Assets in Wales". It is expected that a stage 1 assessment will be carried out for all of the designated heritage assets inside the stated 10km search area, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets. The results of the stage 1 assessment should be included in the EIA as an appendix.</p>	<p>Paragraph 8.4.7 of Chapter 8: Cultural heritage of the ES confirms that a settings assessment has been undertaken giving due consideration to Cadw guidance on setting as laid out in Managing Setting of Historic Assets in Wales and Heritage Impact Assessment in Wales, and similarly within the Welsh Government's Planning Policy Wales Technical Advice Note 24: The Historic Environment. A Stage 1 assessment has been carried out for all designated heritage assets inside a 10km search area and is included under Appendix 1: Scheduled Monuments and Appendix 2: Listed Buildings within Technical Appendix 8.3: Historic Environment Desk Based Assessment (HEDBA) Appendices.</p>
	<p>Construction traffic</p>	<p>The AILCTMP should include;</p> <ul style="list-style-type: none"> • proposals for transporting Alls 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; • management and maintenance of layover areas, junctions, passing places, public rights of way and welfare facilities while AIL deliveries take place • details of temporary signage; • details of any alterations to any works that are carried out to enable AIL movements; • evidence of trial runs that mimic the movement of the worst case Alls along the access route; • number and size of Alls, including loaded dimensions and weights; 	<p>An assessment of the effects of construction traffic is included in Chapter 10: Traffic, Transport and Access. Following consent and during discharge of conditions, a Construction Traffic Management Plan (CTMP) will be created to address applicable conditions.</p>

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<ul style="list-style-type: none"> • number and composition of AIL convoys, including anticipated escort arrangements; • methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary; • convoy contingency plans in the event of incidents or emergencies; • estimated convoy journey durations and timings along the route, including release of forecast traffic queues; • swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route; • proposals for the temporary or permanent modifications required to the highway or its associated infrastructure along the access route and details of how this would be managed; • plans for the reinstatement of any temporary works after completion of the • 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; • proposals to liaise with all relevant stakeholders (including the relevant highway and planning authorities, Police, members of the public and local communities, hauliers, developers and landowners) prior to the submission of notifications for AIL deliveries and applications for special orders for AIL deliveries; • consideration of the cumulative impact of other wind farm schemes proposing to use all or part of the same access route and coordination with those schemes where possible; • the appointment and role of a transport coordinator to administer the abnormal indivisible load delivery strategy; 	

Consultee	Topic area	Issues raised	Where this is addressed in the ES
		<ul style="list-style-type: none"> • means of control of timing of delivery of ALL movements; • temporary traffic diversions and traffic hold points; • details of banksmen and escorts for abnormal loads; • full details of any highway works associated with the construction of layover areas, passing places and highway improvements including: • the detailed design of any works; geometric layout; construction methods; drainage; and street lighting 	
The Coal Authority	Shallow mine risk	<p>Where mine entries are present within the vicinity of the proposed turbines/permanent infrastructure we would expect the equipment to be relocated in order to provide adequate separation between the mine entries, their zones of influence and these structures.</p> <p>We do consider that a further assessment of the risks posed to the development by past coal mining activity will need to be prepared once a detailed layout has been designed. This design should take full account of the recorded positions of the mine entries, their potential departures and their zones of influence and should avoid any works in these areas.</p>	As described within Chapter 2: Design Evolution & Alternatives, the layout of the proposed wind farm has been iteratively developed to avoid geological and mining hazards. A coal mining risk assessment has been undertaken by RSK Geosciences and is included in Technical Appendix 9.2. The assessment concludes there is low or negligible risk from coal mining related hazards and will have no effect on the proposed development.
Blaenau Gwent County Borough Council	Landscape and Visual Impact Assessment (LVIA)	The consideration of all other renewable proposals and existing developments must also be included in a cumulative impact assessment.	All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline within Chapter 5: Landscape and Visual of the ES, followed by a more focused assessment on a detailed 24 km area from the proposed wind farm.

Consultee	Topic area	Issues raised	Where this is addressed in the ES
Monmouthshire County Borough Council	Landscape and Visual Impact Assessment (LVIA)	<p>LVIA's for wind turbine development should include a consideration of cumulative landscape and visual impacts in addition to the requirement for CLVIA that may arise from other OCP wind turbine development or other large scale infrastructure within the assessment area.</p> <p>A radius of 45km for the initial ZTV from the proposed location from a Monmouthshire perspective would be acceptable and would cover the entire county. We would disagree (5.12) that significant effects are unlikely to occur beyond 20km and would expect the ZTV study to consider the significant receptor locations that may fall within and just beyond the 20km guidance including ridgelines to the east of the county, relevant prominent locations and relevant viewpoints, highly sensitive LCA's, Sites on the register of landscapes of outstanding and of special interest in Wales, registered parks and gardens of special historic interest in Wales, national trails and settlements inclusive of roads, footpaths and POS.</p> <p>The information required in the EIA LVIA should also include the location and number of visualisations, photomontages and wirelines. Where cumulative impact is to be considered cumulative ZTV, cumulative wirelines and photomontages must be accompanied by a photograph of the existing landscape.</p>	<p>All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline. In order that the assessment remains focused on those other schemes which have the greatest potential to give rise to significant cumulative effects, it was deemed appropriate to focus the assessment on a detailed 24 km area from the proposed wind farm.</p> <p>The approach to desk study, survey work and assessment has followed industry standard guidance and in accordance with accepted survey methodologies, as set out within Chapter 5: Landscape and Visual. Based on the professional judgement of the authors of the LVIA and their extensive experience of similar onshore wind energy projects across the UK, an initial LVIA study area of 35 km and a detailed LVIA study area of 24 km has been determined.</p> <p>A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual. Visualisations were produced for each of the viewpoints; these are presented in Volume 3. An explanation of how they were produced and information to be read in conjunction with the visualisations is provided in Technical Appendix 5.2.</p>
	LVIA viewpoints	We consider that the proposed viewpoints as indicated on the ZTV plan as per appendix 3 to be insufficient from a Monmouthshire perspective and our concern is that an assessment would not adequately provide a sound baseline from which to	A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual.

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		undertake comprehensive LVIA to support the EIA. We note that most Vpt's towards the east are clustered near to the boundary of Torfaen/MCC with only Vpt's 19-21 located further into Monmouthshire. We would also suggest that one Vpt located in the UNESCO designated BIL.WHS is insufficient to be able to fully assess impact. We would be happy to discuss and suggest LVIA viewpoint locations.	Viewpoint 24 is located at Pen y Fan, within Brecon Beacons National Park.
	Ornithology	A single year of wader surveys may be acceptable given the lack of records during the first year. However, the site is within 5km of the Usk Catchment and Llangorse Lake Important Curlew Area as stated in the Wales Action Plan for the Recovery of the Curlew. Therefore, if wader activity is noted around the site, further targeted survey for these species should be reconsidered.	No evidence of breeding waders (including curlew) was recorded during any of the survey work, including the targeted breeding wader surveys during the first year of survey. Therefore, no further targeted survey for breeding waders was completed.
Bannau Brycheiniog National Park Authority	Cumulative assessment	Given the proliferation of wind farm proposals in proximity to the National Park, we would argue that all existing, consented and submitted turbines within the identified radius need to be considered.	All other wind energy developments that are operational, under construction, consented, subject to a valid full planning application, or a valid Scoping Request within 35 km of the proposed wind farm were identified and reviewed as part of the cumulative baseline within Chapter 5: Landscape and Visual of the ES. In order that the assessment remains focused on those other schemes which have the greatest potential to give rise to significant cumulative effects, it was deemed appropriate to focus the assessment on a detailed 24 km area from the proposed wind farm. The cumulative sites within the 24 km detailed study area are illustrated in Figure 5.30: Other Wind Farms within 24 km.
	Viewpoints (LVIA)	It is unclear whether any of the 25 viewpoints include a view from within the Brecon Beacons National Park of the development. One or two viewpoints (with photomontages) from within the National Park boundary would be useful.	A selection of viewpoints was identified and agreed with statutory consultees to represent a range of views and viewer types, as set out within Chapter 5: Landscape and Visual of the ES. Viewpoint 24 is located at Pen y Fan, within Brecon Beacons National Park.

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	Policy framework (LVIA)	The legal and policy context should refer to the current Brecon Beacons National Park Management Plan (2015-2020). This is the document which sets out the Special Qualities of the National Park. Planning Policy Wales (PPW) requires that the special qualities of designated areas are given weight in the development planning and development management process.	Reference is made to the most recent BBNP Management Plan, which covers the period 2023 - 2028, within Chapter 4: The Statutory and Policy Framework. Reference to the BBNP Management Plan 2023 - 2028 is also made within Chapter 5: Landscape and Visual.
	Shadow flicker	It is unclear whether any assessment is proposed to be undertaken regarding glint and glare. The National Park Authority would be supportive of some consideration being given to glint and glare.	Glint and glare are considered within the Shadow Flicker Chapter in section 12.2 Reflected Light
Welsh Water	Hydrology	Whilst we have no comments on the scoping opinion itself, we would advise that we have numerous wastewater and clean water assets crossing and in close proximity to the site and would be grateful if the developer could contact us to discuss further so we can assess the impact on our assets.	Consultation was undertaken with local authorities and Dwr Cymru in order to identify the location and nature of private water supplies. Details of private water supplies are included in paragraph 9.5.28 and Figure 9.1: Drainage Catchment Areas and Receptors.