

Planning and Environment Decisions Wales  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ  
FOA: Giulia Bazzoni

Our Ref: 04412-9535574  
Your Ref: DNS/3276725

25 February 2025

Dear Ms. Bazzoni,

## **RE: DNS/3276725 Mynydd Maen Wind Farm - Request for Further Information**

This submission responds to your letter of 24 January 2025 seeking further information under Regulation 24 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) in relation to the Mynydd Maen Wind Farm Environmental Statement (ES) that has been prepared to support an application for a Development of National Significance (DNS) which has been submitted to the Welsh Ministers for determination.

The information required to address the identified shortcomings of the Environmental Statement is set out below:

**Item 1: Details/plans to show indicative PRoW diversion routes and their temporary or permanent status. The content of the ES should be updated to include an assessment of the effects.**

A new document titled “2025-02-25 - Supplementary Environmental Information - Outline Public Rights of Way Diversion Strategy” and a new drawing titled “2025-02-25 - Supplementary Environmental Information - Proposed Public Rights of Way Diversion Figure” have been provided as supplementary environmental information to address this item.

**Item 2: Details/plans to show the indicative size, location and segregation of on-site stockpile and waste storage areas during construction. Clarification of what the numbers within the table provided under ‘Item 15’ of the Covering Letter refer to and additional locational information if necessary. The content of the ES should be updated to include an assessment of the effects.**

As described in the response letter dated 07 January 2024, no waste material will be stored on site during construction. Stockpiled material is considered within Technical Appendix 9.3: Soil and Peat Management Plan. Indicative on-site stockpile storage areas are proposed within the appended figure, titled “Proposed Temporary Stockpile Storage Areas”.

The proposed peat storage areas do not cover any known archaeological sites as identified through desk-based assessment. The peat storage areas would be created and used during the construction stage of the Mynydd Maen wind farm, which would be preceded by the implementation of a phased programme of archaeological works, to include initial evaluation, to determine if any significant archaeological remains are present within the development area. The results of the evaluation would determine whether any further archaeological mitigation would be needed and the scope of such work. This mitigation would be completed either before construction works commence or through the implementation of a watching brief during the construction process. The peat storage areas will have no effects on known buried archaeology and mitigation can be implemented where hitherto unknown remains are identified.

The storage of excavated peat will have no impact on site hydrology and geology, provided that best practices are followed. Stockpiles will be kept at a sufficient distance from cut faces to prevent slope instability and minimise any influence on groundwater flow. Peat will not be stored on locally steep slopes, reducing the risk of slippage or erosion. Measures will be taken to prevent drying and desiccation, preserving the peat's natural moisture content and structure. Regular inspections will be conducted to monitor stability and identify any early signs of movement, allowing for timely corrective actions. By adhering to these measures, the storage of peat will be effectively managed without negatively affecting the site's hydrological and geological conditions.

The proposed peat storage areas will have no impact on site ecology, as they avoid the priority habitats other than dry heath, which is unavoidable given its extent on the site. BSG Ecology would not change the assessment of impact on this habitat.

Clarification of what the numbers within the table below refer to has been provided in the updated table below, which shows the type and quantity of construction waste anticipated:

Type of delivery	Approximate number of trips	Frequency	Approximate total number of trips during the construction of the proposed wind farm
General waste	2	Per Month	30
Timber (turbine)	4	Per Turbine	52
Timber (civil/elec phase)	3	Per Phase	6
Metal	2	Per Turbine	26
Sewage	1	Per Month	15
		<b>Total</b>	<b>129</b>

**Item 3: Clarification of when the Bat Activity Survey and Meteorological Data Collection was carried out and an assessment of their robustness if required.**

BSG Ecology have provided clarification on this item within their response letter dated 14<sup>th</sup> February 2025.

**Item 4: An explanation of why the Phase 1 Habitat Survey area, as shown in Figure 6.1, does not include all of the application site.**

Figure 6.1: Phase 1 Habitat Survey Area has been updated to include the proposed works areas along the Abercarn Mountain Road and resubmitted as “2025-02-25 - Environmental Statement - Vol 3 - Figure 6.1 - Phase 1 habitat survey area”. This is outlined within a second response letter provided by BSG Ecology dated 14<sup>th</sup> February, which includes an appended drawing. The letter includes the following statement:

*The Site ‘red line’ boundary (as shown on Figure 6.1) includes three plots adjacent to the Abercarn Mountain Road, within which access works are to be undertaken: a western plot (centred on Ordnance Survey Grid Reference (OSGR) ST 22597 98419); a central plot (centred on OSGR ST 22597 98419); and an eastern plot (centred on OSGR ST 23162 98270). The appended Figure (Figure 1: Abercarn Mountain Road Works Areas) shows the Phase 1 Survey Area, the three plots of the Site boundary adjacent to the Abercarn Mountain Road and the Abercarn Mountain Road with works areas demarcated (at high resolution). In addition, Figure 6.1 has been updated to show the Phase 1 Survey Area along the Abercarn Mountain Road (not shown on that figure previously), for clarity.*

**Item 5: The updated ES Chapter 11 ‘Acoustic’ as referred to in the Covering Letter.**

This document is submitted as ‘2025-02-25 - Environmental Statement - Vol 2 - 11 Acoustic’.

**Item 6: The ‘Technical Appendix 6.6: Outline Habitat and Environment Management Plan’ referred to in the Covering Letter or as ‘Technical Appendix 6.7’ referred to within the ‘Table of Appendices’.**

This document has been submitted as ‘2025-01-07 - Environmental Statement - Vol 4 - Technical Appendix 6.7 - Outline Habitat and Environmental Management Plan’. The first covering letter, dated 7<sup>th</sup> January 2025, has been amended to reflect this and is resubmitted as “2025-01-07 - Supplementary Environmental Information - RES Response Letter 1”.

**Item 7: The updated NTS referred to in the Covering Letter.**

This document is submitted as ‘2025-01-07 - Environmental Statement - Vol 1 - Non Technical Summary’.

**Additional Information**

To reflect the changes described in this letter and to provide clarity, an updated Complete List of Submission Documents, is also provided as “2025-02-25 - Complete List of Submission Documents for the Mynydd Maen Wind Farm DNS 3276725 Application”.

A handwritten signature in black ink, appearing to read "E. Smith", is written over a horizontal line.

Yours Sincerely,

Elliot Smith

Development Project Manager