Mynydd Maen Wind Farm

Pre-Application Consultation (PAC) Report





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1. Introduction/Context

This Pre-Application Consultation Report (PAC Report), relates to an application made by RES (the Applicant) for the Mynydd Maen Wind Farm (the Proposed Development). It provides an account of the statutory consultation, publicity, deadlines set, and activities required under section 61Z of the 1990 Act.

The report also provides details and further information of engagement and consultation undertaken with local communities.

A summary of any issues raised by statutory consultees and the local community are provided in this report, including confirmation of how any issues raised have been addressed. Original copies from statutory consultees are included as an appendix to this report.

A link to the full planning application is also available at the project website <u>www.mynyddmaen-windfarm.co.uk</u>. RES has an Environmental Management System which actively encourages the reduction of paper consumption and promotes recycling where possible. To further reduce paper use, RES would prefer that the planning application is viewed on the project website or that copies are requested in USB format. Copies of the full Environmental Statement are available on USB free of charge. Hard copies of the non-technical summary are available free of charge.

2. Consultees

2.1 Statutory Consultees

Letters notifying the start of the formal consultation period were sent by email to the following statutory consultees on 31st January 2024. Copies of the letters can be found at Appendix 2a.

Consultee	Capacity
Welsh Government Transport Directorate	Specialist Consultee
Cadw	Specialist Consultee
Natural Resources Wales	Specialist Consultee
The Coal Authority	Specialist Consultee
Land Quality Advice Service	Specialist Consultee
Caerphilly County Borough Council	Specialist Consultee
Torfaen County Borough Council	Specialist Consultee

2.2 Community Consultees

The proposed Mynydd Maen site is located in the electoral wards of Newbridge, Abercarn and Crumlin in Caerphilly and the electoral wards of Pontypool Fawr, Upper Cwmbran, Greenmeadow and Two Locks in Torfaen.

Letters notifying the start of the formal consultation period were sent to the following community consultees on 31st January 2024. Copies of the letters can be found at Appendix 2a.

Name	Capacity	
Gareth Davies	Cwmbran Community Council	
Adrian Isaacs	Henllys Community Council	
Lisa McMail	Pontypool Community Council	
Rhianon Passmore MS	Islwyn Constituency	
Chris Evans MP	Islwyn Constituency	

Lynne Neagle MS	Torfaen Constituency	
Nick Thomas-Symonds MS	Torfaen Constituency	
Councillor Kristian Woodland	Crumlin Ward, Caerphilly County Borough Council	
Councillor Carl Thomas	Crumlin Ward, Caerphilly County Borough Council	
Councillor Adrian Hussey	Newbridge Ward, Caerphilly County Borough Council	
Councillor Leroy Jeremiah	Newbridge Ward, Caerphilly County Borough Council	
Councillor Gary Johnston	Newbridge Ward, Caerphilly County Borough Council	
Councillor Denver W. R. Preece	Abercarn Ward, Caerphilly Borough Council	
Councillor Andrew Whitcombe	Abercarn Ward, Caerphilly Borough Council	
Councillor Gaynor James	Pontypool Fawr Ward, Torfaen County Borough Council	
Councillor Mark Jones	Pontypool Fawr Ward, Torfaen County Borough Council	
Councillor Caroline Price	Pontypool Fawr Ward, Torfaen County Borough Council	
Councillor Lucy Williams	Upper Cwmbran Ward, Torfaen County Borough Council	
Councillor Steven Evans	Upper Cwmbran Ward, Torfaen County Borough Council	
Councillor Amanda Owen	Greenmeadow Ward, Torfaen County Borough Council	
Councillor Ron Burnett	Two Locks Ward, Torfaen County Borough Council	
Councillor Peter Jones	Two Locks Ward, Torfaen County Borough Council	
Councillor Colette Thomas	Two Locks Ward, Torfaen County Borough Council	

Initial contact was made with the above stakeholders in January 2022, by letter, advising them that the Applicant was investigating the potential for a wind farm development at the site location. They were invited to arrange a meeting with the Applicant to discuss the proposal further.

Meetings were subsequently held with the following elected officials to brief them about the project:

Elected Member	Constituency	Date(s)	
Lynne Neagle MS	Torfaen	14 th January 2022	
Nick Thomas-Symonds	Torfaen	14 th January 2022	
Rhianon Passmore MS	Islwyn	11 th February 2022	
Councillor Lucy Williams	Upper Cwmbran	7 th August 2023	
Lynne Neagle MS	Torfaen	20 th October 2023	
Rhianon Passmore MS	Islwyn	28 th February 2024	
Chris Evans MP	Islwyn	8 th March 2024	

Further correspondence was shared in March 2022 and June 2023 inviting the community consultees to public consultation events. More information about how these events were publicised can be found at 3.2.

A Community Liaison Group (CLG) was established for discussion and exchange of information as well as to create an effective channel of communication between RES, the local community and stakeholders. The inaugural meeting was held on 16th February 2022 by Microsoft Teams. Subsequent CLG meetings were held on:

- 15th March 2022
- 18th April 2023
- 14th June 2023
- 2nd August 2023
- 15th February 2024
- 24th April 2024

CLG meetings will continue to be held at regular intervals throughout the determination period. Invitations to, and minutes of, CLG meetings are sent to all community consultees listed above.

2.3 Other Consultees

Letters notifying the start of the formal consultation period were sent to the following community consultees on 31st January 2024. Copies of the letters can be found at Appendix 2a.

Consultee	Capacity
British Horse Society	Interested Party
Cyclists Touring Club	Interested Party
Friends of Cwmcarn Forest Drive	Interested Party
Ramblers Association	Interested Party
Glamorgan Gwent Archaeological Trust	Interested Party
Gwent Wildlife Trust	Interested Party
Open Spaces Society	Interested Party
Twmbarlwm Society	Interested Party
Commoners Association	Interested Party
Fifty Commoners	Interested Party
Eighty-eight local residents	Interested Party
Blaen Bran Community Woodland	Interested Party
Llanover Estate	Landowner
Pontypool Park Estate	Landowner
Mr H Vicary	Owner - Adjoining Property

Regular meetings have been held with the Commoners Association throughout the pre-application period and a cooperation agreement between the Applicant and the Commoners Association is currently being finalised.

3. Publicity

3.1 Statutory Publicity

Three site notices were displayed at three locations at the main public access points to the site and to the common, as shown on the plan appended to this report at Appendix 2a.

The site notices were placed on display on 31st January 2024 advising all representations should be made by 15th March 2024. The site notices were removed on 15th March 2024. A copy of the notice can be found at Appendix 2a along with photographs of the site notices in-situ.

The plan at Appendix 2a also identifies adjoining properties on which written notice was served.

Notices were displayed in the South Wales Argus on 1st February 2024, advising any representations should be made within 42 days, by 15th March 2024. A copy of the newspaper advertisement can be found at Appendix 2a.

All documentation is available to view or download on the project website – <u>https://www.mynyddmaen-</u> <u>windfarm.co.uk/dns-application/</u>. The website was updated with all the application documentation on 31st January 2024. Screenshot images of the website can be found at Appendix 2a.

Declarations confirming that three site notices were displayed at the proposed site, and that all documents were published on the project website, <u>www.mynyddmaen-windarm.co.uk</u>, for at least 42 days are appended to this report at Appendix 1.

3.2 Public Publicity

In March 2022, the first public consultation event was held in the form of an online public exhibition, due to Covid-19 restrictions at the time. Prior to the event, newsletters were posted to 3,502 properties within 2km of the proposed site. A copy of the newsletter was also emailed to Henllys, Cwmbran, and Pontypool community councils, ward councillors, MSs, and MPs, located within the electoral wards of Newbridge, Abercarn and Crumlin in Caerphilly and the electoral wards of Pontypool Fawr, Upper Cwmbran, Greenmeadow and Two Locks in Torfaen. An advertisement was also placed in the South Wales Argus to inform the wider community of the online public exhibition. Copies of the mailed leaflet and newspaper advertisement can be found at Appendix 2b.

As part of the online public exhibition, interested parties were invited to book a video or telephone appointment with the project team, if they wished to discuss the proposal further and ask any questions. Three appointments were held with local residents on the day of the online public exhibition.

The information covering the following topics below were presented as part of the online public exhibition and are still available to view at https://www.mynyddmaen-windfarm.co.uk/consultation/online-exhibition-march-2022/:

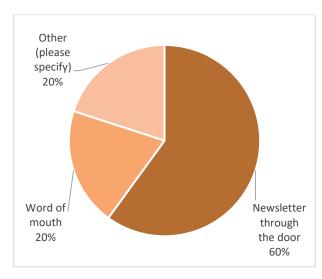
- o About the project
- Design layout and infrastructure
- Environmental considerations
- Traffic and transport
- Supply chain opportunities
- o Common land
- Why wind?

In addition to the above the following visualisations were on display:

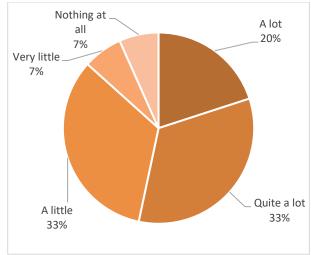
- Zone of Theoretical Visibility (ZTV)
- Photomontages from six viewpoints to provide a representation of what the wind farm could look like based on the preliminary layout.

A comment form was also provided (see Appendix 2b), to gather feedback from visitors to the online public exhibition about the project. Fifteen comment forms were received and below is a summary of the answers received to the questions on the comment form:

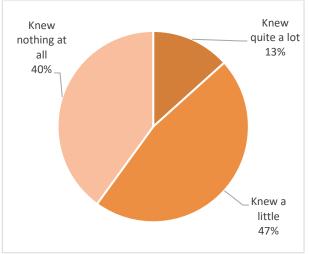
Q1.1 How did you find out about our online exhibition?



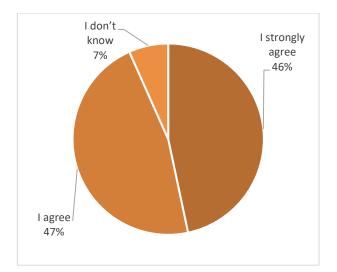
Q1.3 Having visited the online exhibition, to what extent do you feel you have increased your understanding about the proposed Mynydd Maen Wind Farm?



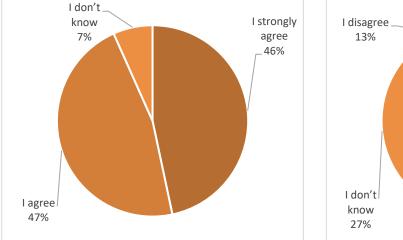
Q1.2 Before visiting the online exhibition how would you describe your knowledge of the proposed Mynydd Maen Wind Farm?

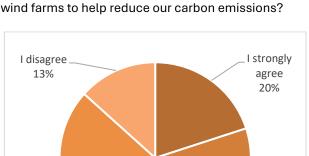


Q2.1 Do you agree that we are facing a global climate change emergency?



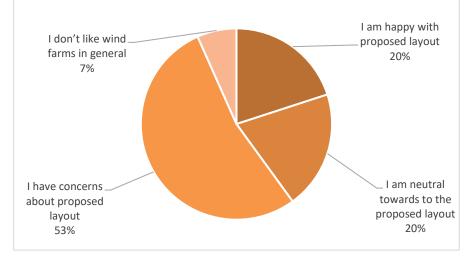
Q2.2 Do you agree that generating electricity from renewable sources, and reducing our reliance on fossil fuels, can help towards tackling the issue of climate change?





Q2.3 Do you agree that we need to develop onshore

Q3.1 What do you think about the proposed design layout of Mynydd Maen Wind Farm?



The comments received at the public exhibitions in March 2022 were taken into account as the proposal was refined.

An updated proposal was presented to the public at a second series of exhibitions in June 2023. The public exhibitions were held over in-person over two days:

- 20th June 2024 0 0 21st June 2024
- 1pm to 6pm 2pm to 7pm

Newbridge Memo, Newbridge Mount Pleasant Community Hall, Pontnewydd

A second newsletter (see Appendix 2b) was sent to 3,512 households within the electoral wards of Newbridge, Abercarn and Crumlin in Caerphilly and the electoral wards of Pontypool Fawr, Upper Cwmbran, Greenmeadow and Two Locks in Torfaen. An Advertisement for the public exhibitions was also placed in the South Wales Argus.

I agree

40%

Information boards covering the following topics were on display at the public exhibition and copies of these can be found at Appendix 2b:

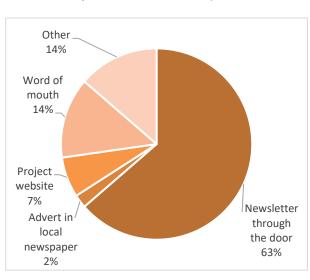
- About the project
- o Design layout and infrastructure
- o Traffic and transport
- o Environmental considerations
- Why wind?
- Working with the local supply chain
- o RES in Wales

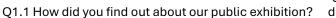
In addition to the information banners the following visualisations were on display:

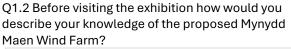
- Zone of Theoretical Visibility (ZTV)
- Photomontages from six viewpoints to provide a representation of what the wind farm could look like based on the updated layout.

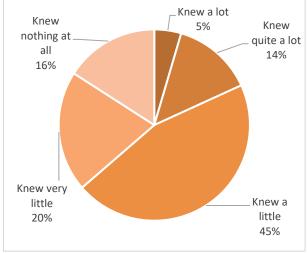
All of the information provided on the exhibition boards was also made available on the project website at <u>https://www.mynyddmaen-windfarm.co.uk/consultation/public-exhibitions-june-2023/</u>.

Twelve visitors attended the public exhibition in Newbridge and approximately seventy visitors attended the public exhibition in Pontnewydd. Visitors were again asked to complete a comment form (see Appendix 2b) following their visit to this second round of exhibitions. Forty-four comment forms were received and below is a summary of the answers received to the questions on the comment form:

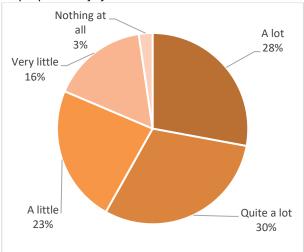




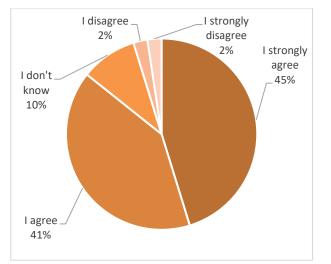




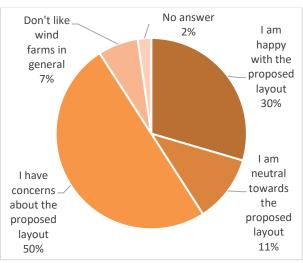
Q1.3 Having visited the exhibition, to what extent do you feel you have increased your understanding about the proposed Mynydd Maen Wind Farm?



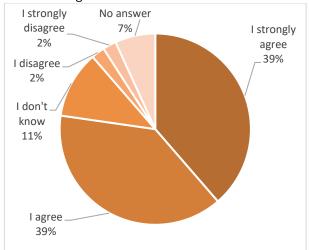
Q4.1 Do you agree that we are facing a global climate change emergency?



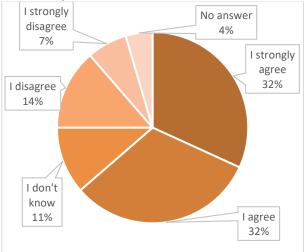
Q2.1 What do you think about the updated design layout of Mynydd Maen Wind Farm?



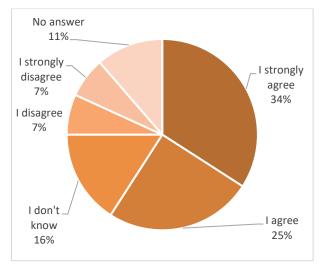
Q4.2 Do you agree that generating electricity from renewable sources, and reducing our reliance on fossil fuels, can help towards tackling the issue of climate change?



Q4.3 Do you agree that we need to develop onshore wind farms to support greater energy independence and security for Wales?



Q4.4 Do you agree that we need to develop onshore wind farms to cut energy bills?



At all stages of the consultation process the Applicant set out clearly the purpose of the consultation and emphasised that comments made were not representations to the determining authority (PEDW) and that there would be the opportunity for representations to the determining authority once the planning application was submitted.

3.3 Outreach and Community Support

Throughout the public consultation phase, RES has been undertaking a number of outreach events including:

- Presentation and Q&A on the Mynydd Maen Wind Farm and renewables in general to Woodlands Community Primary School – June 2022
- Presentation and Q&A on the Mynydd Maen Wind Farm and renewables in general to Woodlands Community Primary School – June 2023
- Attendance at Woodlands Community Primary School for a presentation by the school children on the results of their polling for the Mynydd Maen proposal. Parents and guardians were also in attendance and a RES representative was available with information on the Mynydd Maen proposal for anyone who wished to discuss the proposal or ask questions
- Presentation and Q&A on the Mynydd Maen Wind Farm and renewables in general to Pantside Primary School – April 2024
- Careers presentation and Q&A at Pantside Primary Scholl June 2024
- Attendance at Pantside Primary School's summer fete with information on the Mynydd Maen proposal for any visitors to the event who wished to discuss the proposal or ask questions July 2024

RES was also pleased to support the Pontynewydd Music in the Park event in September 2023 with a donation towards event running costs. RES attended the event with information on the Mynydd Maen proposal for any visitors to the event who wished to discuss the proposal or ask questions.

4. Number of Responses

This section of the report quantifies the total number of responses received and a summary of the responses are provided below.

4.1 Statutory Consultees

Seven notices and letters were sent out to statutory consultees and seven separate responses were received. These responses are summarised below, and copies included at Appendix 4 along with RES' replies to those responses.

Consultees	Opinion	Main Issue(s)	
Welsh Government Transport	Undetermined	Further information requested on vehicle	
Directorate	Undetermined	dimensions and route plan	
Codur	Objection	Archaeological evaluation and additional	
Cadw	Objection	setting assessment	
		Further information requested on protected	
Natural Resources Wales	Undetermined	species, landscape, peat and water	
		environment	
Natural Resources Wales –	No objection	N/A	
Ornithology	NO ODJECTION	N/A	
The Coal Authority	No objection	N/A	
Land Quality Advice Service	Objection	Peat and peat restoration	
Caerphilly County Borough Council	Undetermined	Declined to respond during PAC	
(CCBC)	Undetermined	Declined to respond during FAC	
CCBC - Transport Strategy and	No objection	N/A	
Development Control			
Torfaen County Borough Council	Undetermined	Declined to respond during PAC	

4.2 Community Consultees

Consultees	Opinion	Main Issue(s)
Cwmbran Community Council	No response	N/A
Henllys Community Council	No response	N/A
Pontypool Community Council	Undetermined	Cumulative impact and community benefit
Rhianon Passmore MS	No response	N/A
Chris Evans MP	No response	N/A
Lynne Neagle MS	No response	N/A
Nick Thomas-Symonds MS	No response	N/A
Councillor Kristian Woodland	No response	N/A
Councillor Carl Thomas	Support	N/A
Councillor Adrian Hussey	No response	N/A
Councillor Leroy Jeremiah	No response	N/A
Councillor Gary Johnston	No objection	None
Councillor Denver W. R. Preece	No response	N/A
Councillor Andrew Whitcombe	No response	N/A
Councillor Gaynor James	No response	N/A
Councillor Mark Jones	No response	N/A
Councillor Caroline Price	No response	N/A
Councillor Lucy Williams	Undetermined	Visual and cumulative impacts
Councillor Steven Evans	No response	N/A
Councillor Amanda Owen	No response	N/A
Councillor Ron Burnett	No response	N/A

Councillor Peter Jones	No response	N/A
Councillor Colette Thomas	No response	N/A
Natalie Asghar MS	Undetermined	Public consultation

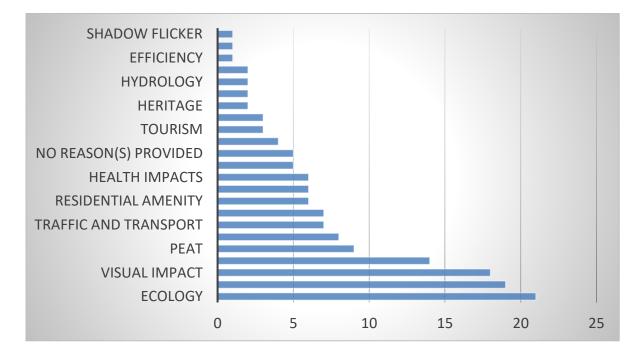
4.3 Other Consultees

Consultees	Opinion	Main Issue(s)	
British Horse Society	No response	N/A	
Cyclists Touring Club	No response	N/A	
Friends of Cwmcarn Forest Drive	No response	N/A	
Ramblers Association	No response	N/A	
Glamorgan Gwent Archaeological Trust	Undetermined	Pre-determination field evaluation	
Gwent Wildlife Trust	No response	N/A	
Blaen Bran Community Woodland	Objection	Visual impact and noise	
Open Spaces Society	No objection	Fencing, access to replacement common land and decommissioning	
Twmbarlwm Society	Objection	Visual impact and tourism	
Commoners Association	No response	N/A	
Fifty Commoners	One response – Undetermined	Ecology	
Countryside And Rights Of Way			
Assistant -	No response	N/A	
Caerphilly County Borough Council			
Team Leader Access, Recreation			
and Community Involvement -	No response	N/A	
Torfaen County Borough Council			
Eighty-eight local residents	Please see summary	below	
Blaen Bran Community Woodland	Objection	Visual impact and noise	
Llanover Estate	No response	N/A	
Pontypool Park Estate	No response	N/A	
Mr H Vicary	No response	N/A	

4.3.1 Resident Responses

Fifty-four responses were received from local residents with 48% of responses from residents residing in Torfaen and 14% from residents residing in Caerphilly. 38% of respondents did not state where they resided.

The key issues raised were visual impact, noise and ecology. A summary of all issues raised is below.



5. Responses and Actions

5.1 Statutory Consultees

Responses from statutory consultees are summarised below together with consequential actions undertaken where necessary. Copies of the responses are appended to this report at Appendix 4.

Consultee Name and ID	Response ID	Summary of Response / Main Issue(s)	Relevant consent	Consequent Actions
Welsh Government Transport Directorate 001	WG001	Further information requested on vehicle dimensions and route plan	DNS	Applicant letter (WG001.01)
CADW 002	CW001	Archaeological evaluation and additional setting assessment	DNS	Applicant Letter (CW001.01)
Natural Resources Wales 003	NRW001	Confirmation of whether any of the trees identified to have potential roost features will be affected by the proposals (e.g. through felling or pruning) and, if so, the inclusion of a map to show the position of all trees with potential roost features and the outcome of the PRF inspections (i.e. whether they have low/moderate/high potential to support roosting bats).	DNS	Applicant Letter (NRW001.01) and revised environmental Statement (ES) Chapter 6.
Natural Resources Wales 003	NRW002	Further information to confirm the buffer distances required for each of the turbines (in accordance with para 7.1.2 and Figure 1 of the above guidance), and whether those will be met (with or without utilisation of the 50m micro-siting allowance).	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 6.
Natural Resources Wales 003	NRW003	Amendment of Schedule of Mitigation to include the blade feathering and turbine curtailment commitments referenced in ES paragraphs 6.21.23, 6.23.5-6.23.7.	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 15.
Natural Resources Wales 003	NRW004	Amendment of the ES (including Schedule of Mitigation) and scheme layout drawings as appropriate to show the additional ponds to be created on and off site (e.g. on the replacement common land and in restored borrow pits) and include commitments for the long-term management and monitoring of the new and retained GCN waterbodies on and off-site.	DNS	Applicant Letter (NRW001.01) and revised ES Chapters 6 and 15.
Natural Resources Wales 003	NRW005	Great Crested Newt (GCN) Conservation Plan.	DNS	Applicant Letter (NRW001.01), revised ES Chapter 6.
Natural Resources Wales 003	NRW006	A summary to be provided specifying the key design changes made to reduce landscape and visual impacts upon the Bannau Brycheiniog National Park (BBNP)	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 5.

Natural Resources Wales 003	NRW007	Additions required to the LVIA	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 5.
Natural Resources Wales 003	NRW008	To assist our understanding and verification of the effects reported, we request a hard copy of the visualisations printed at the intended paper size for use on site. We request this be provided in advance of the formal submission of the planning application.	DNS	Hard copies to be provided when the application is submitted.
Natural Resources Wales 003	NRW009	Additional information required in BBNP assessment	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 5.
Natural Resources Wales 003	NRW010	We request that further detail is provided in relation to the assessment of cumulative receptors within the BBNP	DNS	Applicant Letter (NRW001.01) and revised ES Chapter 5.
Natural Resources Wales 003	NRW011	We advise the AONB boundary is not shown on Figure 5.9. To assist our understanding and verification of the effects reported, we request the boundary is added to Figure 5.9 and Figure 5.5 (to illustrate potential hub height visibility).	DNS	Applicant Letter (NRW001.01) and revised Figures 5.9 and 5.5.
Land Quality Advice Service 004	LQAS001	Peat and peat restoration	DNS	Applicant Letter (LQAS001.01) and revised ES chapter 9.
The Coal Authority 005	CA001	No objection	DNS	N/A
CCBC - Transport Strategy and Development Control 006	CCBC001	No objection	DNS	N/A

5.2 **Community Consultees**

Respondent Name and ID	Response ID	Summary of Response / Main Issue(s)	Relevant consent	Consequent Actions
Pontypool Community Council 007	PCC001	Cumulative impact and community benefit	DNS	Applicant letter (PCC001.01)
Councillor Lucy Williams 008	LW001	Visual and cumulative impact	DNS	Applicant letter (LW001.01)
Natalie Asghar MS 009	NA001	Public consultation	DNS	Applicant letter (NA001.01)

5.3 Other Respondents

Respondent Name and ID	Response ID	Summary of Response / Main Issue(s)	Relevant consent	Consequent Actions
Glamorgan Gwent Archaeological Trust 010	GGAT001	Pre-determination field evaluation	DNS	Applicant letter (GGAT001.01)
Blaen Bran Community Woodland 011	BBCW001, BBCW002	Visual impact and noise	DNS	Applicant letter (BBCW001.01)
Open Spaces Society 012	OSS001, OSS002	Fencing and access to replacement common land	Commons Act	Applicant letter (OSS001.01 and OSS002.01)
Twmbarlwm Society 013	TS001	Visual impact and tourism	DNS	No response required
Edlogan Commoner 014	EC001	Ecology	Commons Act	Applicant letter (EC001.01)
Local residents	Pl	ease see summary of	applicant's respon	nse below

5.3.1 Applicant's response to local resident feedback

Landscape and Visual		
Sample of comments received	Applicant's response	
"They will spoil the natural beauty of the mountain.	A full Landscape and Visual Impact Assessment	
The turbines will be visible for miles around and will	(LVIA) has been undertaken which considers the	
dominate the landscape, particularly for those	potential effects of the project on landscape	
residents who live nearby."	character and visual amenity within a study area up to	
	15 km from the site. From the studies undertaken and	
"Visualisations from Raglan Castle and Llanhennock	the professional advice received, RES believes that	
in no way make up for lack of visualisations from	the current turbine locations and heights proposed	
Cwmbran."	are appropriate for a wind farm at this location.	
"Already turbines of smaller sizes obscure the views from Mynydd Maen."	Localised significant effects on landscape character and visual amenity are inevitable as a result of commercial wind energy development anywhere in	
"I don't think the positions chosen in any way	the UK. A detailed cumulative LVIA taking into	
represent typical views from Cwmbran"	consideration operational, consented and in-planning	
	wind farms has been undertaken and, whilst the LVIA	
"I object to these installations as they are a visual	identified some significant landscape and visual	
obscenity in any area"	effects, it is considered that the landscape has the	
	capacity to accommodate the effects identified,	
"Most of us have a view of bricks. This should be	especially given that it is located within an area that	
placed as a clear argument in support of the project in	has been assessed by the Welsh Government as	
so far as the area is already being configured to house	being capable of accommodating large-scale wind	

Property Value		
Sample of comments received	Applicant's response	
"They will devalue local residents' homes"	Queries are often raised in relation to the potential of wind farms to impact upon the value of house prices	
"A devaluing prospect for local society housing and communities"	as there can be a perception that there must be a negative effect on house prices. Property value is subjective and can be affected by a range of factors. There is no firm evidence on whether UK onshore wind farms do or do not affect house prices, this is further evidenced from various studies on the same topic having starkly different results. RES is aware of residents close to other renewable energy projects, who enjoy having renewable energy projects close by and believe that they add value to their community.	
Acou	istics	
Sample of comments received	Applicant's response	
"Wind turbines create noise"	Surveys of the existing background noise levels were undertaken in 5 locations in consultation and	
"They will generate constant noise and nuisance to residents"	agreement with the Environmental Health Officers acting on behalf of Caerphilly and Torfaen County Borough Councils. Predictions of the sound levels associated with the operation of the development have been undertaken in accordance with best practice guidance and incorporates topographical	

Peat		
Sample of comments received	Applicant's response	
"Peat is an important store of CO_2 which should be	The principle of avoidance of peat has been more	
protected"	clearly set out in Chapter 9 and Appendices 9.3 and	
"Domogo to the mountain will include the post being	9.5 of the final Environmental Statement and in the Green Infrastructure Statement.	
"Damage to the mountain will include the peat being dug up and replaced with concrete bases"	Green minastructure Statement.	
	The final assessment of peat has adopted the	
"I am concerned about the effect on the peat- an	definitions of peatland published in the National	
important carbon sink"	Peatland Action Programme and is no longer based on	
	the 0.5m depth advised in the Scoping Direction.	
	An additional peat survey undertaken in May 2024 has	
	informed the updated infrastructure layout to avoid	
	deeper peat. Figure 9.3 illustrates the infrastructure in	
	relation to peat depths.	
	Volumes of peat and further details of the	
	management of peat are now included in Appendices	
	9.3 and 9.5 of the ES.	
	The Environmental Statement has been updated, and	
	the Planning Statement and the Green Infrastructure	
	Statement address Planning Policy Wales and how	
	peatlands have been addressed from a policy	
	perspective.	

Ecology

Sample of comments received	Applicant's response
"Wildlife and ecosystems will be adversely and	A non-avian Ecology Impact Assessment forms part of
permanently impacted"	the Environmental Statement and includes a range of
	studies, including mitigation measures where
"Bird strike and bats being killed by the blades plus	appropriate, for habitats, protected species and
damage to the eco-system are a great concern of	notable species (e.g. national and European
mine"	Protected Species). Avoiding impacts on bird species,
	wherever possible, is also an important factor in the
	design of the site. Baseline ornithological survey work
	has been undertaken for a minimum of two years,
	during breeding and non-breeding seasons to build
	our understanding of the species on site. RES has
	undertaken three peat surveys within the project

	boundary and all turbines and associated infrastructure are positioned to avoid, where viable, any area of deep peat. Furthermore, the wind farm, if consented, could deliver biodiversity net benefit through measures including, but not limited to, restoration and management of dry heath, bracken control, pond creation and management and hydrological re- naturalisation improving condition of wet heath.
Enviror	imental
Sample of comments received	Applicant's response
"They are proven to be non environmentally friendly partly due to the low advantage of power going back to the grid" "The hypocrisy of importing these turbines from China (a country with a very dodgy human rights record) and selling this project to the public as being "environmentally friendly" is unethical"	The planning application for the wind farm proposal is supported by a Carbon Balance Report which assesses the impact in terms of CO2 emissions against the total potential carbon savings attributed to the proposed wind farm. The conclusion of the carbon calculator shows that the proposed wind farm would effectively pay back its expected carbon debt from manufacture, construction, impact on habitat and decommissioning within 1.3 years based on a fossil fuel-mix emission factor (source: Digest of UK Energy Statistics (DUKES) 2023). RES has not stated the origin country of the turbines at this stage. This would be a decision made post- consent and would be subject to detailed design and market at the appropriate time. RES has a proven track record of using local contractors, suppliers and services, wherever possible, to maximise inward investment.
Minin	gRisk
Sample of comments received	Applicant's response
 "Mining records indicate underground plans of the colliery between Pontypool and Hafodyrynys known as 'Wern Tillery' which will be directly below the proposed wind turbines and as such should be thoroughly investigated." "What about old mine workings under the mountain itself" "The mines under the mountain are "still there" concerns over the fracture of faults impacting the old mines as the windfarm would be constructed is alarming" 	A desktop Coal Mining Risk Assessment (CMRA) (Appendix 9.2), followed by an intrusive Geotechnical Investigation (boreholes and trial pits) was undertaken to establish the ground conditions and assess the identified risk from shallow coal workings. The boreholes recorded intact sandstone bedrock throughout and there was no evidence of any underground coal mining to the full depths of drilling. The assessment concluded that no further investigation or remediation with regards to coal mining hazards is required.

Need for the	Development
Sample of comments received	Applicant's response
"Great idea. It should go ahead." "Welsh countryside being used to provide renewable energy beyond our borders"	Onshore wind, alongside other renewable technologies, is the cheapest form of electricity generation. It can be deployed quickly and delivered at lower costs than offshore wind, hydro, marine technologies, and nuclear.
"I am not convinced of the benefits to wind farms in general" "For a long time now, the government have been using underhand tactics as a way of charging people more for this push for "net zero". All for the Global warming total lie that has been invented as a way to tax the poor even more and make the rich richer."	If consented, the Mynydd Maen Wind Farm scheme would be capable of generating enough clean, low- cost renewable electricity for approximately 55,000 homes. With the rising cost of living and climate change emergency, it is imperative that we deliver electricity efficiently and at the lowest cost to the consumer.
"Yes the UK needs energy but this project is no excuse to spoil a natural habitat that has existed for ever and at best only a short term measure."	Wind energy is a free and inexhaustible resource which has an important role to play as part of a balanced energy mix. It increases energy security by reducing our reliance on imports and is not subject to sudden price fluctuations or the uncertainty of global markets.
	Wales was the first country in the world to declare a climate emergency and has set out in law, its intention to achieve net zero by 2050, but has committed to continue to do all it can to get there sooner. The Wales Energy Strategy has a target of Welsh renewables to generate electricity equal to 70% of Wales' consumption by 2030. Onshore wind will play an important role in helping achieve these targets.
	Whilst temperature and weather patterns have naturally fluctuated throughout history, scientists now agree that there is "unequivocal evidence that Earth is warming at an unprecedented rate" not seen in the past 10,000 years and that "human activity is the principal cause." Rapidly melting ice sheets accelerate rises in sea levels and ocean warming, longer droughts, more frequent floods, wildfires and tropical storms are just some of the devastating effects of climate change seen across the globe which are affecting humans and other species.

Recycling

Sample of comments received	Applicant's response
"The blades are non recyclable and end up in a heap usually in another country"	While about 90% of turbines are easily recyclable, turbine blades are not widely recyclable yet. The industry recognises this, and extensive work is
"I'm not in agreement as to the recycling of such monstrosities"	underway to establish a circular economy.
	There is research underway into producing a 100% recyclable turbine blade and a recent pilot project in Northern Ireland has developed a scalable method to

recycle 100% of turbine blades, ensuring that valuable resources are turned into new products that can substitute materials such as virgin plastics, steel, and concrete instead of simply going to waste.
There are also options for blade re-purposing. Blade material is incredibly strong and when in a suitable condition, it can be repurposed for new structures. This reduces landfill, retains embodied carbon in the material, reduces the need for virgin material and creates skilled jobs. Whilst there are a finite number of other structures which could be constructed from blade material, there is also potential to refurbish blades for use as second-hand blades.

6. Main Issues

Main Issue	Traffic and Transport
Relevant Application Documents	Environmental Statement (ES), WG001
Respondent(s)	Welsh Government Transport Directorate
Applicant's Summary of the Response (WG001)	Further information was requested on the route plan and vehicle dimensions.
Applicant's Response (WG001.01)	The vehicles will depart from the Port of Swansea via Baldwin Crescent, joining the A483 heading east before exiting onto the M4 continuing in an easterly direction. The vehicles will exit the M4 at junction 28 and continue north on the A467, exiting onto Central Ave and continuing north to site via Old Pant Road and the Abercarn Mountain Road. The site will be accessed via an upgraded entrance, using an upgraded single-track road. Vehicle dimensions provided as part of applicant's response.

Main Issue	Archaeology and Cultural Heritage
Relevant Application Documents	Environmental Statement (ES), GGAT001, GGAT001.01, CW001, CW001.01
Respondent(s)	Glamorgan Gwent Archaeological Trust (GGAT)
Applicant's Summary of the Response (GGAT001, CW001)	GGAT recommended a pre-determination field evaluation be conducted in order to further investigate the potential archaeological remains, particularly those dating to the prehistoric period.
Applicant's Response (GGAT001.01, CW001.1)	The wind farm design has been revised so none of the proposed infrastructure now directly impacts upon any identified archaeological features. Physical archaeological evaluation of the site prior to determination of the planning application would cause unnecessary and unacceptable impacts on the habitats and other ecology of the site for a development which might not proceed. Furthermore, such evaluation would interfere with the operation of the common which is managed by the commoners exercising their rights to graze livestock and control heather and bracken amongst other functions. RES would adhere to a planning condition requiring reasonable archaeological evaluation and any subsequent mitigation necessary should the application be consented. RES understands that in the event

that significant archaeological remains are identified, that additional time
and resources will be required to ensure any such remains are
appropriately investigated, recorded and reported upon. Based on the
assessment undertaken it is considered that there is a low chance that
archaeological remains are present of such significance that they would
require preservation in-situ, but this potential is acknowledged.

Main Issue	Protected Species
Relevant Application Documents	Environmental Statement (ES), NRW001, NRW002, NRW003, NRW004, NRW0005, NRW001.01
Respondent(s)	Natural Resources Wales (NRW)
Applicant's Summary of the Response (NRW001, NRW002, NRW003, NRW004, NRW0005)	NRW requested further information and amendments to the Schedule of Mitigation in respect of potential impact on bats and Great Crested Newts.
Applicant's Response (NRW001.1)	Further survey work has been undertaken and the layout of the wind farm infrastructure has been modified. These modifications are presented in the final Environmental Statement.

Main Issue	Landscape and Visual
Relevant Application Documents	Environmental Statement (ES), NRW006, NRW007, NRW008, NRW009, NRW010, NRW011, NRW001.01, figures 5.5 and 5.9
Respondent(s)	Natural Resources Wales (NRW)
Applicant's Summary of the Response (NRW006, NRW007, NRW008, NRW009, NRW010, NRW011)	Additional information required in respect of the BBNP and request that the AONB boundary is shown on the relevant figures.
Applicant's Response (NRW001.1)	Further survey work has been undertaken and the layout of the wind farm infrastructure has been modified. These modifications are presented in the final Environmental Statement.

Main Issue	Landscape and Visual
Relevant Application Documents	Environmental Statement (ES), PCC001, PCC001.01, LW001, LW001.01, BBCW001, BBCW002, BBCW001.01, TS001
Respondent(s)	Pontypool Community Council (PCC), Councillor Lucy Williams (LW), Blaen Bran Community Woodland (BBCW), Twmbarlwm Society (TS)
	PCC requested investigation into the potential cumulative effects of wind turbines in the local area.
Applicant's Summary of the Response (PCC001, LW001, BBCW001, BBCW002, TS001)	LW asked RES to investigate the possibility of siting turbine 9 further from The Square, Cwmbran and to consider the cumulative effect of wind turbines in the SE Wales area.
	BBCW and TS raised concerns on the visual impact of the wind farm in respect of their respective settings.
Applicant's Response (PCC001.01, LW001.01, BBCW001.01)	A full Landscape and Visual Impact Assessment (LVIA) has been undertaken which considers the potential effects of the project on landscape character and visual amenity within a study area up to 15 km from the site. From the studies undertaken and the professional advice received, RES believe that the current turbine locations and heights proposed are appropriate for a wind farm at this location. A Residential Visual Amenity Assessment has been carried out as part of the LVIA which concludes that views from properties on The Square in Upper Cwmbran

are generally more open, except where partially restricted by intervening trees or buildings. Existing telecoms mast and electricity pylons are visible on the horizon and telegraph poles between houses. Although there is a greater degree of theoretical visibility from properties on Belle Vue Lane, views are filtered through intervening trees. The oblique angle of view combined with the small amount of the proposed wind farm which is theoretically visible above the horizon from these properties, and the partial screening effect of intervening properties in some cases, would result in no potential for the proposed wind farm to be overbearing.
Localised significant effects on landscape character and visual amenity are inevitable as a result of commercial wind energy development anywhere in the UK. A detailed cumulative LVIA taking into consideration operational, consented and in-planning wind farms has been undertaken and, whilst the LVIA identified some significant landscape and visual effects, it is considered that the landscape has the capacity to accommodate the effects identified, especially given that it is located within an area that has been assessed by the Welsh Government as being capable of accommodating large-scale wind energy. The design of the proposed wind farm is the result of a considered iterative process which has sought to minimise landscape and visual effects whilst achieving the technical and commercial requirements to ensure project viability without public subsidy. Consequently, we do not consider that a reduction in the number of turbines is necessary for the Mynydd Maen proposal.

Main Issue	Peat
Relevant Application Documents	Environmental Statement (ES), LQAS001, LQAS001.01
Respondent	Land Quality Advice Service
Applicant's Summary of the Response (LQAS001)	All wind farm infrastructure to be considered in respect of deep peat and schemes for decommissioning and borrow pit restoration and after-use should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility.
Applicant's Response (LQAS001.1)	The principle of avoidance of peat has been more clearly set out in Chapter 9 and Appendices 9.1 and 9.3 of the final Environmental Statement and in the Green Infrastructure Statement.
	The final assessment of peat has adopted the definitions of peatland published in the National Peatland Action Programme and is no longer based on the 0.5m depth advised in the Scoping Direction.
	An additional peat survey undertaken in May 2024 has informed the updated infrastructure layout to avoid deeper peat. Figure 9.3 illustrates the infrastructure in relation to peat depths.
	Volumes of peat and further details of the management of peat are now included in Appendices 9.1 and 9.3 of the ES.
	It is accepted practice to include a decommissioning condition in a wind farm decision notice. This generally requires the turbines and all associated infrastructure to be removed and the land returned to its former status, in accordance with a decommissioning scheme which has first been submitted to and approved in writing by the local planning authority. RES would expect a similar condition to be included, should the application be consented.

The Environmental Statement has been updated, and the Planning Statement and the Green Infrastructure Statement address Planning Policy Wales and how peatlands have been addressed from a policy perspective.
RES expect the management of the borrow pits, which would be fully reinstated back to existing ground levels, to be the subject of a planning condition to be discharged prior to commencement of the development. Chapter 3 of the Environmental Statement describes how a Borrow Pit Method Statement would be agreed with the local authority prior to commencement of construction, and this would include provisions for the control of surface run-off and how the borrow pits would be fully reinstated.

Main Issue	Public Consultation
Relevant Application Documents	Pre-Application Consultation Report, NA001, NA001.01
Respondent	Natalie Asghar MS
Applicant's Summary of the Response (NA001)	Clarification was requested on how the notice of the proposals were displayed and publicised, confirming which publications, localities and dates they appeared.
Applicant's Response (NA001.1)	Consultation for the proposal started in February 2022 when a Community Liaison Group (CLG) was established consisting of locally elected members from Caerphilly and Torfaen. The CLG provides a forum for discussion and exchange of information as well as to create an effective channel of communication between RES, the local community and stakeholders. Meetings have been held at regular intervals since February 2022 and are ongoing.
	Separately RES has met with the MSs and MPs for both Caerphilly and Torfaen to discuss the proposal.
	The first public exhibition in March 2022 was held online due to Covid restrictions at the time. The exhibition was advertised through a newsletter which was distributed to around 3,500 local properties, plus to local stakeholders and a quarter page advertisement was placed in the South Wales Argus on 28 th February 2022. The information provided for the online exhibition is still available to view at https://www.mynyddmaen-windfarm.co.uk/consultation/online-exhibition-march-2022/ and hard copies of all exhibition material were available on request.
	In-person public exhibitions were held over 2 days in June 2023 and, as with the online exhibition, newsletters advertising the exhibitions were sent to around 3,500 local properties as well as local stakeholders. A quarter page advertisement and a front-page banner advertisement were placed in the South Wales Argus on 9 th June. Copies of all the information presented at the public exhibitions was available on the website from 20th June for those who were unable to attend the exhibitions. The information remains on the website for future reference, at https://www.mynyddmaen-windfarm.co.uk/consultation/public-exhibitions-june-2023/ .
	The formal Pre-Application Consultation (PAC) commenced on 31 st January and closed on 15 th March and the draft applications and

supporting information were available to view on the project website.
Public notices were displayed on site and a public notice was also placed
in the South Wales Argus on 31 st January 2024. A letter or email was also
sent to 82 local residents who had asked to be kept updated on the
proposal. Posters, advertising the PAC, were also provided to elected
members in Caerphilly and Torfaen who have put them on various
noticeboards in their respective areas.

Main Issue	Acoustics
Relevant Application Documents	Environmental Statement (ES), BBCW001, BBCW002, BBCW001.01
Respondent	Blaen Bran Community Woodland (BBCW)
Applicant's Summary of the Response (BBCW001, BBCW002)	Concerns raised that noise would disturb wildlife and users of BBCW.
Applicant's Response (BBCW001.1)	Surveys of the existing background noise levels were undertaken in five locations in consultation and agreement with the Environmental Health Officers acting on behalf of Caerphilly and Torfaen County Borough Councils. Predictions of the sound levels associated with the operation of the development have been undertaken in accordance with best practice guidance and incorporates topographical effects. These show that turbine sound levels will be well within the requirements of current planning guidance. The noise limits, derived in relation to the existing background noise levels, will form a planning condition attached to any potential consent. Whilst the turbines may well be audible under certain conditions, similar to any new noise source introduced to a rural environment, the level of sound will be relatively low, much lower than that considered, for example, to have a direct effect on sleep.

Main Issue	Ecology
Relevant Application Documents	Environmental Statement (ES), EC001, EC001.01
Respondent	Edlogan Commoner
Applicant's Summary of the Response (EC001)	Concerns raised that the wind farm proposal would impact on the natural habitat fauna and flora on Edlogan Common.
Applicant's Response (EC001.1)	A non-avian Ecology Impact Assessment forms part of the Environmental Statement and includes a range of studies, including mitigation measures where appropriate, for habitats, protected species and notable species (e.g. national and European Protected Species). Avoiding impacts on bird species, wherever possible, is also an important factor in the design of the site. Baseline ornithological survey work has been undertaken for a minimum of two years, during breeding and non-breeding seasons to build our understanding of the species on site. RES has undertaken two peat surveys within the project boundary and all turbines and associated infrastructure are positioned to avoid any area of deep peat. Furthermore, the wind farm, if consented, could deliver biodiversity net benefit through measures including, but not limited to, restoration and management of dry heath, bracken control, pond creation and management and hydrological re-naturalisation improving condition of wet heath.

Main Issue	Common Land
Relevant Application Documents	Commons Act Section 16 and Section 38, OSS001, OSS002, OSS001.01, OSS002,01
Respondent(s)	Open Spaces Society
Applicant's Summary of the Response (OSS001, OSS002)	Queries raised in relation to fencing of access tracks, Public Rights of Way users, replacement Common Land and the Common Land Report. Temporary fencing may be installed along the access tracks during the
Applicant's Response (OSS001.01, OSS002.01)	construction phase to prevent people and livestock from straying into potential danger where machinery is operating, or construction vehicles are travelling. There is no intention to erect permanent fencing along the access tracks. RES considers it important to retain as much of the commons as possible as an open recreational space for the public and, although replacement land will be provided to ensure the overall common area is not reduced, inclusion of the tracks further increases the area available to the public. RES can agree to a planning condition which restricts the erection of permanent fencing along the access tracks unless it is approved by the Local Planning Authority. Temporary fencing however may be installed during construction and maintenance activities at any time throughout the life of the wind farm where necessary for safety purposes.
	RES can agree to installing signs displaying the 'open access' symbol on footpaths leading to the replacement land. RES has no objection in principle to horse riding along the access tracks. However, this must consider the landowners and commoners who may be impacted by any unintended consequences of this action. RES agrees to explore the exact mechanism for permitting such activity with the landowners and commoners.
	RES and the landowners agree to register the release land at the end of the wind farm project, and this is referred to in the s16 application.
	New stockproof fencing will be erected to denote the new boundary of the common at Gelli Gravog to incorporate the replacement land. There is an existing fence at Cwm Lickey which will form the new boundary of the common. As replacement land, the existing grazing rights at Cwm Lickey and Gelli Gravog will cease, and the land will become part of the common available for the commoners' livestock to graze. The land at Cwm Lickey and Gelli Gravog is already in similar condition to the common and will not require any special management measures to make the land more suitable for grazing.
	The replacement land at Coed Cae Watkin already has public footpaths running through and adjacent to it; additional gates will ensure the public can more easily continue to gain access. Cwm Lickey and Gelli Gravog already have public footpaths running adjacent and through them (respectively); removing the fences or installing gates between the common and the replacement land will incorporate the replacement land into the common.

7. Summary and Conclusion

This Pre-Application Consultation (PAC) report sets out the consultation in respect of the DNS application for the Mynydd Maen Wind Farm proposal. The PAC report confirms that all necessary statutory pre-application consultation has been undertaken.

This report also sets out consultation activities undertaken during the public publicity period. It shows that the applicant engaged early with the local community to facilitate a constructive consultation process; this has helped them understand and address any concerns as the project developed. Through the consultation process, the Applicant has helped the community in understanding the benefits and impacts of the proposed wind farm and added value and improved the quality of the proposal through meaningful and productive consultation.

Feedback received from the public exhibitions was considered as the design for the proposed scheme was refined and contributed to changes to the proposal including a reduction in the number of turbines, reduction in turbine height and a change to some turbine positioning.

In summary, concerns raised notably in respect of archaeological features and avoidance of deep peat have been addressed through an updated wind farm design as presented in the planning application.

Appendices	
Appendix 1	Declaration of Compliance
Appendix 2a	Copies of Publicity Documentation – (Statutory letters, notices and newspaper advert)
Appendix 2b	Public Publicity (introduction letter, exhibition invite letter, exhibition leaflet, exhibition advert, exhibition
	information banners and exhibition questionnaire)
Appendix 3	List of Addresses for all Consultees
Appendix 4	Copies of Responses from Statutory Consultees and Copies of Consequent Actions Taken