Nicola Bond
Planning & Environment Decisions Wales
Crown Building
Cathays Park
Cardiff
CF10 3NQ

25 August 2025

Dear Nicola,

DNS Application reference DNS 3276725 - Mynydd Maen Wind Farm

I write to you as Development Project Manager at RES in response to your correspondence dated 3rd June 2025, issued under Regulation 15(2) of the DNS Regulations (EXNOTE006). The letter outlined a request for further information in relation to the DNS Application for Mynydd Maen Wind Farm (DNS 3276725) with key topics listed in Annex B by the Inspector. An extension was granted on 10th June 2025 (EXNOTE007) with a new deadline for submission of the 26th August 2025.

This covering letter outlines the formal RES response to each topic listed in Annex B with various topics being responded to in a separate technical note, and others responded to directly in this letter.

Landscape and Visual

A technical submission (*2025-08-25 – Landscape and Visual Impact Response*) addressing landscape and visual impact matters as raised in Annex B is attached. This document provides a detailed response to concerns raised by stakeholders including Natural Resources Wales (NRW), Caerphilly County Borough Council (CCBC), and Torfaen County Borough Council (TCBC).

The document also includes a response to TCBC in regard to the Residential Visual Amenity Assessment (RVAA) and the concerns relating to cumulative impact.

Peatland Resource and Habitat

As per Appendix B, Both NRW and WG's Peatland and Agricultural Land Use Planning Unit (LQAS) have objected on the impact on peat resource and its associated habitat. The WG also commented on the Phase II NVC surveys undertaken to date.

The response to this section has been provided in three parts. BSG have provided a response on ecology and habitat matters working in collaboration with SLR and Rigare where they have focused primarily on hydrology of the site.

BSG and Rigare both undertook additional survey work to further increase the understanding of the site which helped inform the response to the main concerns highlighted by both stakeholders.

Peatland resource can be seen from SLR in *2025-08-25 Peatland Resource Response (SLR)* and Rigare in *2025-08-25 Peatland Resource Response (Rigare)*. The habitat response can be noted in *2025-08-25 Ecology and Habitat Response.* Together, these documents provide the RES response to the key areas of concern from the consultees.

Cultural Heritage

As raised in Annex B, RES has prepared a further technical submission (*2025-08-25– Cultural Heritage Response*) addressing cultural heritage. In response to concerns raised by Cadw and CCBC regarding potential Bronze Age round barrow as well as possible earthworks identified through Lidar data, RES has undertaken additional site survey work to support further assessment of these features. The findings of this evaluation are presented in the referenced technical submission and provide a detailed response to the potential significance of the features and the impact of the Proposed Development on their setting.

Aviation

NATS have objected to the Proposed Development as per their Technical and Operation Assessment. Details of RES's liaison with NATS is as below.

RES has been in regular discussions with the NATS Renewables and Mitigations Team about the requirements for a radar mitigation for the proposed Mynydd Maen Wind Farm application since 2023, prior to the application being submitted.

During these pre-application discussions NATS noted that the existing en-route radar at Clee Hill was not able to mitigate the impact of wind farm on its operations and consequently NATS would object to the proposal. However, NATS advised that they could accept a suspensive condition on any future consent provided a Statement of Common Understanding (SOCU) between NATS and RES was agreed, relating to the need and delivery of a mitigation solution.

There is no disagreement from RES as to the need for mitigation for the Clee Hill Radar, nor to the agreement of the SOCU as a means of providing NATS with the comfort to enable a suspensive condition to be attached to any future consent.

The agreement and signing of this SOCU has been delayed due to NATS technical reviews and tenders relating to the replacement of radars, including Clee Hill.

Discussions relating to the mitigation of Mynydd Maen Wind Farm on the Clee Hill radar and associated SOCU recommenced in May 2025. NATS have advised that the Indra replacement works for the Clee Hill radar would

commence in 2028, with completion by 2029. It is noted that NERL has submitted planning permission for the new radar, which is to be situated near the existing radar to enable continued operations throughout the works. It is RES' understanding that the SOCU can be signed on the basis of the new Indra radar is capable of mitigating the effects of Mynydd Maen Wind Farm. The documentation is currently with NATS and RES lawyers and it is expected that the agreement will be finalised within the next few weeks, thus enabling NATS to remove their objection and agree wording of a suitable suspensive condition prior to any future Hearing.

Minerals

Both CCBC and TCBC have raised concerns regarding mineral safeguarding. Specifically in relation to the high PSV sandstone aggregate resource present within the Proposed Development. RES has addressed these concerns in a separate technical note *(2025-08-25 – Mineral Safeguarding Response)* which outline the response to the safeguarding implications.

Living Conditions

In relation to living conditions, the request from TBC has been addressed in two parts. The first relates to RVAA, with specific reference to Turbine 9/ The Square in Upper Cwmbran, and Pantygasseg, as well as cumulative impacts. RES's response to this is contained within the Landscape and Visual Impact Response (*2025-08-25 – Landscape and Visual Impact Response*).

The second part outlines a response to TCBC's concerns regarding proposed mitigation for shadow flicker. RES's response to this matter is provided as below.

RES Proposes to alleviate concerns over mitigation by implementation of a remediation scheme, requiring assessment and mitigation of flicker events. This mitigation scheme could be achieved through a suspensive condition on any future consent. Suggested wording:

Shadow Flicker
1) No turbine shall be erected until a scheme for the avoidance or mitigation of shadow flicker at residential properties which lawfully exist or for which planning permission has been granted as at the date of this consent, has been submitted to, and approved in writing by, the Planning Authority.

(2) The approved mitigation scheme shall be implemented in full in line with the approved scheme.

Reason: To offset any impacts of shadow flicker on residential property amenity.

The final content of the conditioned mitigation scheme would be agreed with the council prior to construction.

It is important to note that only a worst-case assessment has been completed at this stage and assumes that all houses have windows facing the wind farm, with no shielding (other than terrain) between properties and

turbines. It also assumes turbines are always turning during potential flicker hours, are always oriented to cause maximum flicker, and that there is no cloud cover. Based on these highly conservative assumptions, a worst-case shutdown scenario was modelled, indicating that a complete shutdown during all theoretically possible flicker times would reduce the yield of the wind farm by no more than 0.1%.

The times when shadow flicker could occur can be accurately predicted. If significant flicker is detected at any property within 10 rotor diameters of the Proposed Development the management system would, once the flicker was manually verified, be able to automatically switch off any turbines causing flicker during these times, thereby reducing the impact to non-significant levels. Such a system would be remotely monitored by the wind farm operator and would be in place for the operational life of the wind farm.

Highways and PRoW

Highways

The WG's Department for Economy and Infrastructure (Highways) has requested clarification on travelling heights. The below is RES response to this request.

To ensure that PEDW are satisfied that turbine component travelling heights are within the maximum limit of 4.9m, dimensions of the proposed candidate turbine are listed in Table 1. All dimensions are taken directly from Vestas Specification 0083-9775: *Site Road Infrastructure Specifications V105/V112/V117/V126/V135/V150*, which provides indicative transport arrangements for each component. The most onerous components are included within Table 1.

Component	Height	Width	Length
Blades	4.514m	4.05m	61.3m
Tower (Diameter)	4.44m		13.2m - 30m
Nacelle (Low top)	4.608m	4.2m	21.4m
Drive Train	4.703m	3.507m	21.4m
Hub	4.3m	4m	23.2m

Table 1 - V117 Transport Dimensions

Once consented, Mynydd Maen Wind Farm will select a wind turbine supplier. Typically, the appointed supplier will arrange an independent transport consultant and/or haulier to carry out further Swept Path Analysis, and likely a dry run of the route.

Public Rights of Way

Additionally, CBC has concerns regarding impacts on established public rights of way, as outlined from paragraph 7.6 of its Local Impact Report (LIR). RES has reviewed these matters and provides the following response.

An outline Public Rights of Way (PRoW) Diversion Strategy was submitted with the application. It considers the interaction between the proposed development and existing PRoW. It acknowledges that a separate application, not included within the secondary consents of the of the application would be required, similarly to Upper

Ogmore Wind Farm in Bridgend CBC. TCBC has confirmed that an application for the diversion of the PRoW at Mynydd Maen would be considered after consent of the DNS application when required and would be submitted under section 257 of the Town and Country Planning Act 1990. All proposed diversions would be considered in consultation with both CCBC and TCBC. Requirements for temporary diversions would be considered following any micrositing of the turbines.

RES confirms that only one permanent minor diversion is proposed, which will reroute a section of track around the proposed substation. This location has been carefully selected due to its proximity to the existing powerlines, which is essential for grid connection and minimising additional infrastructure. Alternative locations for the substation were considered but ruled out due to constraints such as peatland, priority habitats, and topography.

No other permanent impacts to PRoW are required. Temporary fencing and diversions will be implemented during construction, and RES will follow all relevant planning procedures and policy to ensure public access is maintained. The site is designated as common land, and public access rights remain unaffected. The presence of tracks near hardstanding areas will not inhibit public movement across the site, and no turbine bases intersect with existing PRoW. In fact, the development may result in improved track conditions in certain areas, enhancing accessibility.

RES does not consider the PRoW interactions to represent a significant constraint to the development and remains committed to engaging constructively with CCBC to discuss any outstanding concerns

Benefits of the Development

RES provides the below in respect to concerns raised regarding benefits of the Proposed Development.

Onshore wind capacity factors are increasing year on year due to technological innovation. This is recognised by the Department for Energy Security and Net Zero who in their CfD (Standard Terms) Regulations document[1] assume an onshore wind capacity factor (>5MW) of 44.8% for new build projects (delivery years 2026-2029). The site's final capacity factor is a product of final turbine selection. However, RES' current assessment of the proposed Mynydd Maen Wind Farm has a predicted capacity factor of 41.7%.

The Campaign for the Protection of Rural Wales (CPRW) quote a capacity factor of "about 25%". It should be noted that this is an average figure taken from individual capacity factors across the UK's current operational onshore wind fleet with a combination of older and newer technology. As such, it is not reflective of the expected capacity factor of the newer technology which would be deployed at Mynydd Maen, if consented.

The Applicant has received one enquiry from a member of the public regarding community ownership. RES are currently looking at how RES could potentially offer some form of community ownership on several projects currently in development elsewhere in the UK. If there was sufficient interest from community groups around

[1] CfD (Standard Terms) Regulations

the Mynydd Maen project, then RES would be very happy to meet with them, discuss the work to date and understand their aspirations which RES could then consider further in the delivery of the Mynydd Maen project.

Mynydd Maen Wind Farm, if consented, would provide a community benefits package to help to secure long-term economic, social and environmental benefits; this could include RES' innovative Local Electricity Discount Scheme (LEDS) which provides an annual discount on the electricity bills of properties closest to participating renewable energy projects.

RES works directly with stakeholders and the community to better understand how the wind farm could support the local area and to inform a tailored community benefit package, aligned with the communities' priorities. RES looks forward to continuing conversations about community benefit as the project progresses and working with locally elected representatives from the closest communities to reach a final decision on the package to be delivered.

The proposed wind farm would also provide an economic boost to both Borough Council areas and the regional economy, creating jobs and stimulating economic activity during its construction and operational phases.

RES has a strong track-record of working closely with the local supply chain around its projects and maximising inward investment opportunities wherever possible. During the construction of Garreg Lwyd Wind Farm, Powys, RES appointed a local civil engineering company, Jones Bros, resulting in the project generating some £15 million inward investment, all of which was spent within Mid and North Wales with £3 million invested in the immediate Powys area. Over 21 further local companies, suppliers and accommodation providers were utilised, and the project also sustained employment for 95 people all of whom were from within 70 miles of the site. In addition, Jones Bros were able to add seven apprentices, to their annual training programme, as a direct result of the wind farm contract.

Mynydd Maen is estimated to involve a capital spend of £74.0 million. Of this total, £26.3 million (nominal prices) would be realised within the Welsh economy. The projected 15-month construction phase is estimated to create or sustain 233 total (direct, indirect and induced) job years of employment, £5.68 million of wages, and £14.89 million of GVA to the Welsh economy.

The estimated total (direct, indirect, and induced) annual benefits realised in Wales by the operational phase of the proposed wind farm includes 8 jobs, £160,000 of wages, and £590,000 in GVA. Furthermore, business rates for the proposed wind farm are estimated at £1.07 million per year or £37.3 million over the project lifetime.

Planning Conditions and Obligations

RES is actively engaging with officers at both CCBC and TBC regarding the establishment of a Planning Processing Agreement (PPA). While initial draft conditions have previously been suggested by RES, further engagement is anticipated following agreement of the PPA and submission of the Further Information. As with

all consultees, RES remains committed to proactive collaboration and aims to agree a 'Schedule of Planning Conditions' in advance of the hearings commencing.

RES also note the CCBC request for a planning obligation to secure a decommissioning fund. However, this can be secured by means of a condition and doesn't require a legal obligation prior to any decision.

Planning Statement Update

RES has also provided a Planning Statement Update which has a focus on the climate and renewable energy policy considerations which have emerged since the DNS application was submitted in July 2024. It is provided to ensure that the Inspector has the up to date policy position in advance of the Hearings.

Removal of JRC Objection

As requested by PEDW in the email dated 11th June 2025 from Infrastructure Consenting Manager Giulia Bazzoni, the below outlines the position of JRC. While JRC's consultation response was received outside the formal consultation period, it confirms their intention to withdraw their objection to the proposed development.

'Further to our initial objection this development is predicted to cause significant interference to NGED's CNI radio links and on that basis we have previously objected to the proposal. However NGED have agreed the following planning condition with RES (Section 13.3.9 ***(of the ES)****) to ensure appropriate mitigation is implemented prior to the windfarm being built:*

"No construction shall commence until a scheme for the mitigation of impacts on telecommunication operations within the site (operated by NGED (formerly WPD)) has been submitted to and approved in writing by the Local Planning Authority. The agreed scheme shall be implemented in full at the cost of the developer prior to the commencement of construction. Reason: To protect existing telecommunication links within the site."
On the basis of the planning condition being included in the final outcome, JRC are willing to remove their objection to this proposal.

Kind regards,

James Robson
Development Project Manager
james.robson@res-group.com
M +44 7391 049917