25 August 2025

Mynydd Maen Wind Farm

Request for Further Information: Mineral Safeguarding

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Contents

1 Introduction

1.1 Overview

1.1.1 This document has been prepared in response to a formal request for further information issued by Planning and Environment Decisions Wales (PEDW) as part of the ongoing planning application for the Mynydd Maen Wind Farm (DNS/3276725). The request forms part of the regulatory framework under Regulation 24 of the Environmental Impact Assessment (EIA) Regulations and Regulation 15(2) of the Development of National Significance (DNS) regulations. The regulations mandates consultation and submission of supplementary technical information to support the determination of the application and the formal request was made by PEDW in a letter addressed to the Applicant dated 03 June 2025.

1.1.2 The application has undergone consultation with statutory consultees and stakeholders, and this document aims to address specific queries and provide clarifications as requested by the appointed inspector.

1.1.3 Caerphilly County Borough Council (CCBC), and Torfaen County Borough Council (TCBC) have advised that the consent and subsequent construction of Mynydd Maen wind farm would have a negative impact on the Mineral Safeguarding Areas (MSA) within the respective council areas.

1.2 Author

1.2.1 The technical note concerning impacts on Mineral Safeguarding Areas has been prepared by Calum Campbell, the Senior Project Engineer at RES. Calum holds an MSc in Mechanical Engineering and has over 9 years' professional experience as a Project Engineer, with over 7 years' experience in undertaking, or reviewing, various chapters of wind farm Environmental Impact Assessments (EIA), including Traffic & Transport, and Hydrology & Hydrogeology.

1.2.2 Calum was supported by the RES development team, which includes various disciplines, who are experienced in EIA preparation.

1.3 Stakeholder Concerns

1.3.1 Both CCBC and TCBC have common concerns with respect to the consent and construction of Mynydd Maen wind farm occupying, and effectively sterilising, a portion of the designated MSA which straddles their council boundary. Each council's concern and reasoning is included below:

Caerphilly Council Borough County

CW22 – Minerals

Development proposals which may impact on minerals safeguarding areas will be considered against the following requirements, as applicable:

A *Proposals for permanent development uses within identified mineral safeguarding areas will not be approved unless:*

i The applicant can demonstrate that the mineral is no longer of any value or potential value, or

ii The mineral can be extracted satisfactorily prior to the development taking place, or

iii There is an overriding need for the development, or

iv The development comprises infill development within a built up area or householder development or an extension to an existing building

B *Proposals for development uses of a temporary nature within identified mineral safeguarding areas will not be approved unless they can be completed and the site restored to a condition that does not inhibit mineral extraction within the timescale that the mineral is likely to be needed*

Torfaen Council Borough Council

Minerals

The site is located within a minerals protection zone. LDP Policy M1 (Minerals Safeguarding) states:

"Development proposals will not be permitted which would permanently sterilise important mineral resources within the Aggregate Safeguarding Areas or Coal Safeguarding Areas identified on the Proposals Map, unless there is an overriding need for the proposed development and: -

a) the Mineral resource is recovered before the proposed development commences; or

b) the developer has satisfactorily demonstrated that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable"

In addition, the Council (as a Minerals Planning Authority - MPA) is required by Welsh Government Policy to produce a 'Regional Technical Statement' (RTS) on the'demand for 'and 'supply of' aggregates (i.e. crushed rock and sand & gravel) every 5 years; and RTS requirements need to be provided for in Torfaen's Replacement

Local Development Plan (RLDP). The latest RTS 2 nd Revision, September 2020, requires Torfaen to make provision for 150,000 tonnes of 'crushed rock' aggregate p.a. (either Carboniferous Limestone or Sandstone) in its LDP Review and 10 years thereafter; which equates to an 'apportionment' of 3.75 million tonnes (Mt); noting that Torfaen has no permitted reserves and thus a 3.75Mt shortfall.

Torfaen has no extant aggregate planning permissions, known as 'reserves', but has potential workable Sandstone and Carboniferous Limestone aggregates (known as 'resources') protected under LDP Policy M1. These crushed rock aggregate 'resource blocks' in the Torfaen LDP were identified in 2009 study as being on the western flank of Torfaen, see the red area highlighted below (which the LDP policy seeks to protect). Torfaen has three potential stand stone (high PSV Sandstone aggregates of regional and UK importance safeguarded) areas (Mynydd Llwyd, Mynydd Twyn-Glas & Mynydd Maen Mountains) which are all within the proposed wind farm site area - potentially accessed via the same road to Hafodyrynys (A472) in Caerphilly.

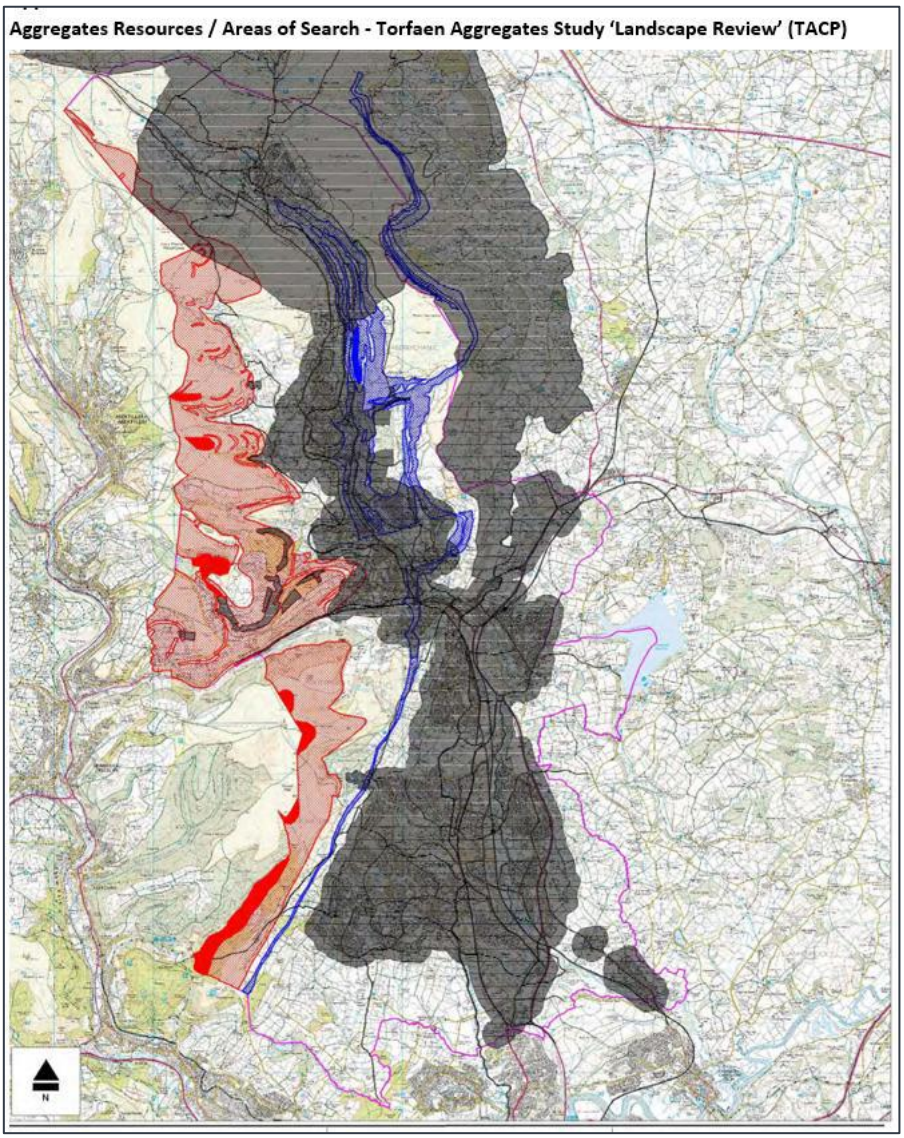

Figure 1 - The darker red areas on the map above are those areas that are considered to be viable without having an adverse visual impact

It is considered that given the proposed layout of the windfarm this would have a negative impact on the potential high PSV Sandstone aggregates of regional and UK importance that is safeguarded in the Torfaen LDP.

The safeguarding within policy is to ensure the potential for Torfaen to meet its RTS2 aggregate apportionment and maintain a 10 year minimum landbank (which is currently uncertain), and the potential (identified in RTS2) to move the supply of such aggregates further east in South Wales and thus closer to UK markets to the east (to the benefit of carbon reduction in its transportation).

Recent appeal decisions, determined by the Welsh Minister, for Craig-yr-hesg Quarry near Pontypridd, Rhondda Cynon Taf (Appeal References: APP/L6940/A/20/3265358 / APP/L6940/A/21/3282880), for a similar high quality (polished stone value (PSV)) Pennant Sandstone of national importance, the Welsh Minister in allowing the appeals noted that the Inspector gave "significant weight to the regional and UK need for such minerals and the requirement to maintain a 10 year minimum landbank" (paragraphs 8-13, 50 & 56). However, it would be for the Inspector on the evidence of this application to balance the above against national policy which, in principle, is supportive of windfarm energy on this site.

In summary it is considered that this development would have a negative effect on the ability of Torfaen to meet its aggregates requirement required by the regional.

2 Mineral Safeguarding Area Impacts

2.1 Aggregate Quality

2.1.1 Based on British Geological Survey (BGS) mapping, the proposed Mynydd Maen wind farm is located largely, if not wholly, within an area underlain with *Hughes Member – Sandstone*. The rock unit itself is not entirely sandstone, due to the presence of thin mudstone, siltstone, and seatearth interbeds. The siltstone and mudstone within the site area are categorised as being "*very weak to medium strong*". The reuse of aggregates with high fines materials (argillaceous) are also advised against in the *Manual of Contract Documents for Highway Works*, Series 600 for any aggregates intended for general fill. It's unlikely that any mudstone or siltstone material found on site would be suitable for aggregate reuse given the likelihood for high fines content.

2.1.2 Based on this, there is no indication that the rock potentially available within the Mynydd Maen proposed infrastructure area is of high, or for some cases useable, quality. For the volume of excavated rock/fill material associated with wind farm construction, it is practical and realistic to assume a suitable stratum of sandstone with minimal interbedding of mudstone and siltstone of sufficient volume might be found. However, on a commercial operation scale this is less likely.

2.2 Sterilisation Areas

2.2.1 Table 1 shows the overall area of the infrastructure footprint associated with the proposed Mynydd Maen Wind Farm as a percentage of the council areas impacted, and also the approximate areas of mineral safeguarding impacted. The individual MSA for each impacted council area are indicated in Figure 1, with the Torfaen areas taken from the TCBC *Local Impact Report*, *Minerals* section.

2.2.2 The MSA within each council borough were approximated using the *South East Wales – Aggregate Safeguarding Map of Wales* (Annex A), this was due to the absence of the dataset the map was created with.

Area	km^2	% Area Mynydd Maen Infrastructure Occupies
Caerphilly County Borough Council	277.4	0.059
Torfaen County Borough Council	126.2	0.131
Caerphilly MSA (1)	23.8	0.693
Torfaen MSA (2)	17.5	0.943
Torfaen MSA (3)	6.4	2.578
Combined MSA	**47.7**	**0.346**
Infrastructure within Torfaen MSA	0.038	0.159
Infrastructure within Caerphilly MSA	0.127	0.534
Mynydd Maen Infrastructure Total (CCBC & TCBC)	**0.165**	**0.346**

Table 1 – Approximate % area Mynydd Maen Wind Farm infrastructure would occupy

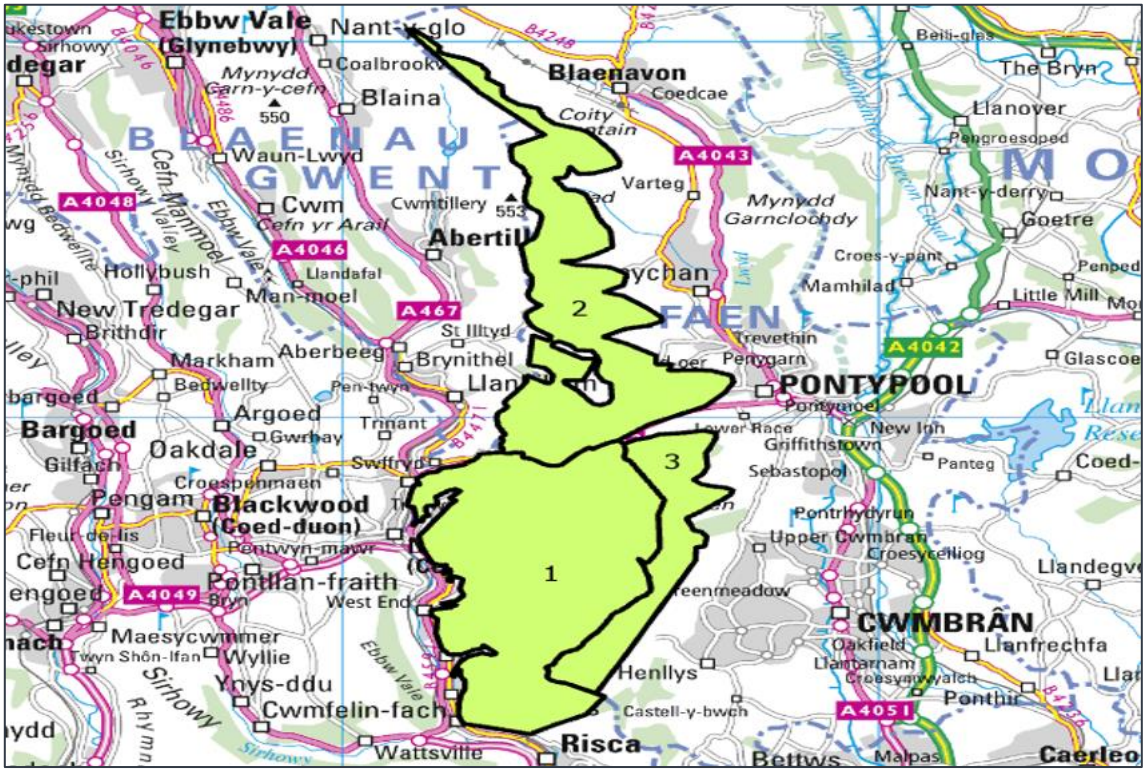

Figure 2 - Approximate Mineral Safeguarding Areas affected within CCBC & TCBC as detailed in Table 1

2.2.3 Table 1 highlights that for each of the council areas affected by the area the wind farm would occupy, the sterilisation areas are approximately 0.53% and 0.16%. There are also existing gas pipelines and a gas pressure reduction station on Mynydd Maen and there is overlap with the proposed wind farm infrastructure. This means that some of the land outlined as being sterilised due to wind farm construction is already sterilised because of the gas works.

2.3 Remaining Mineral Extraction Potential and Conclusions

2.3.1 Should construction of Mynydd Maen Wind Farm be consented, mineral extraction in proximity to the wind farm will remain viable. Appropriate excavation and works buffers can be applied to all wind farm infrastructure. For the gas infrastructure, however, any excavation buffers would be determined by Wales & West Utilities.

2.3.2 Given the very limited areas of the mineral safeguarding zone affected by the proposed development the Proposed Development would not have a significant adverse impact on the potential high PSV Sandstone aggregates as identified in the Torfaen LDP and would clearly not impact on the ability of TCBC to meet its aggregates requirement required by the region. Furthermore, there would be no unacceptable impacts arising in relation to mineral resources and no conflict with relevant planning policies.

3 Annex A: South East Wales – Aggregate Safeguarding Map of Wales