



**BLAENAU GWENT COUNTY BOROUGH COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990 (as amended)**

**The Developments of National Significance  
(Wales) Regulations 2016**

**LOCAL IMPACT REPORT**

Application by: Pennant Walters Ltd via David Kenyon, Wood Group UK

Site: Approximately 500m west of Abertillery and accessed via a forestry haul road off the A4046 Aberbeeg Road.BG: CON/2022/0004

Planning Inspectorate Reference: DNS/3270299

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<b>1.0</b>	<b>INTRODUCTION</b>
1.1	This Local Impact Report (LIR) has been prepared to meet the requirements of Section 62K of the 1990 Act, and Regulation 25 of the Developments of National Significance (Procedure) (Wales) Order 2016. The LIR has been prepared to inform the Planning Inspectorate of the likely impact of the proposed development on the area. The report is based on existing local knowledge and evidence of local issues.
1.2	In accordance with Section 62K the LIR will set out at a minimum: - <ul style="list-style-type: none"><li>• Planning history of the site</li><li>• Local designations relevant to the site / surroundings</li><li>• Any relevant local planning policies, guidance or other documents</li><li>• Evidence of the Publicity undertaken by the LPA in accordance with the Procedure Order, i.e. a copy of the Site Notice, a photograph of the Site Notice on display and a map showing the location of the Site Notice.</li><li>• The likely impact of the development on the area</li><li>• Secondary consent requirements</li><li>• Draft conditions or obligations which the LPA considers necessary for mitigating any likely impacts of the development</li></ul>
1.3	This LIR is reliant upon information available within the submitted documents and prior knowledge of the site, and has regard to the relevant procedural guidance contained at Appendix 5 of the Welsh Government's 'Guidance on Developments of National Significance'.
1.4	The LIR is a factual document that should not weigh evidence or make recommendations. Accordingly, this LIR will not qualify impacts other than stating whether impacts are anticipated to be positive, negative or neutral, since to do otherwise would be to apply weighting which is expressly excluded in the relevant advice.
<b>2.0</b>	<b>SITE AND SURROUNDINGS</b>
2.1	The application site lies wholly within the administrative area of Blaenau Gwent County Borough Council (BGCBC). The eastern boundary of the site is located approximately 500m from the western side of Abertillery with the site separated from the town boundary by a 200-300m buffer of mature trees. The village of Cwm is located approximately 700m to

	<p>the north-west. The closest point of Marine Industrial Estate, is set approximately 150m lower than the site.</p>
2.2	<p>The site encompasses an area approximately 208 hectares (ha), comprising a mix of semi-improved and improved grass land which forms the southern end of a forked upland ridge between the Ebbw Fawr valley and the Ebbw Fach valley. The land-use of the more elevated section to the north is mainly unimproved upland moorland with an absence of field boundaries and a substantial area that is used for motorbike scrambling. The more southerly and westerly parts of the site are characterised by improved and semi-improved grazing land with distinctive angular shaped field patterns defined by a combination of stone walls, post and wire fencing and isolated lengths of beech hedgerow. The steeper valley sides are mainly used for commercial woodland, which is a mixture of coniferous and broadleaved species.</p>
2.3	<p>The site is split by an area of coniferous plantation woodland on the western slopes, a forestry haul road and the operational Hafod Y Dafal solar farm which extends to 28.6 hectares. The site is accessed via the forestry haul road which connects with the A4046 Aberbeeg Road to the west. Hafod Y Dafal farm house and buildings are located centrally within the western spur with Arail Farmhouse and outbuildings located to the south of the eastern spur.</p>
2.4	<p>There are substantial levels of public access across the site with several Public Rights of Way (PRoW) allowing access from the adjacent settlements. The north-west corner of the Site is Access Land. This Access Land extends northwards along the top and upper slopes of the ridgeline, past Mynydd Carn y Cefn as far as Beaufort. The areas of woodland that surround the western spur of the Site are also Access Land.</p>
<b>3.0</b>	<b>THE PROPOSED DEVELOPMENT</b>
3.1	<p>The Proposed Development would comprise the following elements:</p> <ul style="list-style-type: none"><li>• Up to eight wind turbines, with a maximum hub height of 105m and a maximum height to blade tip of 180m;</li><li>• Substation and control buildings;</li><li>• Temporary construction compound (50m x 50m)</li><li>• Laydown and storage area;</li><li>• Temporary site office;</li><li>• Crane pads and cabling;</li></ul>

<p>3.2</p> <p>3.3</p> <p>4.0</p>	<ul style="list-style-type: none"> <li>• Access track construction</li> </ul> <p>It is anticipated that the turbines would have an operational life of 30 years and an electrical export capacity of up to 34MW</p> <p>This LIR will primarily consider the works within BGCBC however, it will also address wider impacts the development may have upon BGCBC.</p> <p><b>PLANNING HISTORY</b></p>												
	<table border="1"> <thead> <tr> <th data-bbox="341 629 660 674">Application No</th> <th data-bbox="660 629 1289 674">Proposal</th> <th data-bbox="1289 629 1506 674">Decision</th> </tr> </thead> <tbody> <tr> <td data-bbox="341 674 660 1182">C/2014/0126</td> <td data-bbox="660 674 1289 1182">Provision of photovoltaic solar park (14mw) comprising of 53,955 photovoltaic solar panels over 28.6 HA of agricultural land and ancillary infrastructure to include 1 substation, 11 inverter stations, pole mounted security cameras, security fencing, creation of an all-weather access route for maintenance, excavation of a cable trench to the south for grid connection and landscaping.</td> <td data-bbox="1289 674 1506 1182">Approved 07.11.2014</td> </tr> <tr> <td data-bbox="341 1182 660 1532">C/2013/0295  APP/X6910/A/15/2230097</td> <td data-bbox="660 1182 1289 1532">The erection of 2 wind turbines with a max blade tip height of up to 131m, together with assoc, hard standings, a substation &amp; control building, an improved access track, connecting internal access tracks, a temp construction compound &amp; turning area, &amp; other related infrastructure.</td> <td data-bbox="1289 1182 1506 1532">Refused 30/07.2014  Appeal Dismissed 23.09.2015</td> </tr> <tr> <td data-bbox="341 1532 660 1621">C/2004/0363</td> <td data-bbox="660 1532 1289 1621">Land reclamation &amp; associated coal recovery</td> <td data-bbox="1289 1532 1506 1621">Approved 12/04/2005</td> </tr> </tbody> </table>	Application No	Proposal	Decision	C/2014/0126	Provision of photovoltaic solar park (14mw) comprising of 53,955 photovoltaic solar panels over 28.6 HA of agricultural land and ancillary infrastructure to include 1 substation, 11 inverter stations, pole mounted security cameras, security fencing, creation of an all-weather access route for maintenance, excavation of a cable trench to the south for grid connection and landscaping.	Approved 07.11.2014	C/2013/0295  APP/X6910/A/15/2230097	The erection of 2 wind turbines with a max blade tip height of up to 131m, together with assoc, hard standings, a substation & control building, an improved access track, connecting internal access tracks, a temp construction compound & turning area, & other related infrastructure.	Refused 30/07.2014  Appeal Dismissed 23.09.2015	C/2004/0363	Land reclamation & associated coal recovery	Approved 12/04/2005
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4.1	A copy of the appeal decision APP/X6910/A/15/2230097 is provided at appendix 1.												
5.0	<b>LOCAL DESIGNATIONS RELEVANT TO THE SITE / SURROUNDINGS</b>												
5.1	The proposals and constraints maps forming part of the Blaenau Gwent												

	<p>County Borough Council Local Development Plan (LDP), adopted in 2012, provides the following information:</p>
5.2	<p>The site is located in an area of open countryside outside of any defined settlement boundary.</p>
5.3	<p>Whilst the site is not covered by any statutory environmental designations, the following local designations fall within the site:</p> <ul style="list-style-type: none"><li>• Special Landscape Area (SLA) of Mynydd Carn y Cefn and Cefn yr Arail (ENV2.4)</li><li>• Site of Importance for Nature Conservation (SINC) ENV3.6 – Craig –y-Deri Pond;</li><li>• SINC ENV3.20 – Mynydd Carn-y-Cefn and Cefn-yr-Arail, Ebbw Vale and Upper Ebbw Fach;</li><li>• SINC ENV3.24 – Pond Group 3;</li><li>• SINC ENV3.105 – Arail Farm Slopes North;</li><li>• SINC ENV3.107 – Arail Pond;</li><li>• SINC ENV3.115 – Cefn Bach, Abertillery;</li><li>• SINC ENV3.124 – Hafod-y-Dafal Acid Grasslands;</li><li>• SINC ENV3.126 – Cwm Big North;</li><li>• SINC ENV3.128 – Coetgae Pond;</li><li>• Aggregate Safeguarding Area – Sandstone (M1);</li><li>• Mineral buffer zone for Six Bells and Vivian Tips, Six Bells (500 metre buffer) (M2)</li><li>• Preferred mineral extraction area and buffer zone (M4.3)</li><li>• High Risk Coal Mining Areas;</li><li>• Numerous Rights of Way;</li><li>• Tree Preservation Orders – single, group and woodland and</li><li>• An area of Ancient semi-natural woodland is located on the south-western edge of the eastern spur.</li></ul>
5.4	<p>With regards to surrounding designations, The Brecon Beacons National Park (BBNP) and the Usk Bats Site of Special Area of Conservation (SAC) lie approximately 8.5km and 10km (respectively) to the north with the Cwm Merddog Woodlands Site of Special Scientific Interest approximately 1.4km to the north west. The Aberbargoed Grasslands SAC is located approximately 7km to the south-west of the site.</p>
5.5	<p>Blaenavon World Heritage Site (WHS) is located approximately 6km to the north east with the Blaenavon Coity Mountain Historic Landscape</p>

	<p>(HLCA020) located approximately 1.2km north-east. Although there are no recorded heritage assets within the redline boundary of the application site, there are a number of Scheduled Ancient Monuments and Listed Buildings within the surrounding urban areas and landscape that fall within the Zones of Theoretical Visibility (ZTV) as shown on figure 7.2 as supplied by the applicant.</p>
5.6	<p>An area of recorded landslip is located approximately 2.5km to the north of the site. A copy of the slope monitoring report is provided at Appendix 2.</p>
5.7	<p>An extract of the LDP Proposals map is attached at Appendix 3. Locational details of the constraints outside of the redline boundary but within the wider locality are given at figure 7.2, 8.1, 8.2, 8.3, 11.2 and 16.2 of the applicant's submission.</p>
<b>6.0</b>	<b>LOCAL DEVELOPMENT PLAN</b>
6.1	<p>Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that all planning applications are determined in accordance with the relevant development plan policies, unless material considerations indicate otherwise.</p>
6.2	<p>The Development Plan for the area comprises the Blaenau Gwent County Borough Council Local Development Plan (LDP). Whilst the plan is currently under review, with regard to the provisions of the 2015 Planning (Wales) Act, any development plan adopted prior to 4 January 2016 will remain the LDP for determining planning applications until replaced by a further LDP. Therefore, the LDP, which was adopted on November 2012, remains the extant statutory development plan for the area beyond the specified 2021 plan period.</p>
6.3	<p>The following policies are of relevance:</p> <p><u>Strategic Policies</u></p> <ul style="list-style-type: none"><li>• SP2- Southern Strategy Area- Regeneration</li><li>• SP7- Climate Change</li><li>• SP8- Sustainable Economic Growth</li><li>• SP9- Active and Healthy Communities</li><li>• SP10- Protection and Enhancement of the Natural Environment</li><li>• SP12- Securing an Adequate Supply of Mineral</li></ul> <p><u>Topic Based Policies</u></p>

	<ul style="list-style-type: none"><li>• DM1- New Development</li><li>• DM2- Design and Placemaking</li><li>• DM4- Low and Zero Carbon Energy</li><li>• DM14- Biodiversity Protection and Enhancement</li><li>• DM15- Protection and Enhancement of the Green Infrastructure</li><li>• DM16- Trees, Woodlands and Hedgerow Protection</li><li>• DM19- Mineral Safeguarding</li><li>• SB1- Settlement Boundary</li><li>• ENV2- Special Landscape Areas</li><li>• ENV3- Sites of Importance for Nature Conservation</li><li>• M1- Safeguarding of Minerals</li><li>• M2- Mineral Buffer Zones</li><li>• M4- Preferred Areas</li></ul>
6.4	A copy of the relevant LDP Policies are attached at Appendix 4.
6.5	<p><u>Supplementary Planning Guidance</u></p> <p>The following approved Supplementary Guidance is also considered to be of relevance to this application:-</p> <ul style="list-style-type: none"><li>• Nature Conservation Planning Guidance</li></ul>
6.6	<p><u>Interim Planning Guidance</u></p> <ul style="list-style-type: none"><li>• Planning Obligations (September 2011)</li></ul>
6.7	<p>The following study document is also considered relevant: Sensitivity and Capacity Study for Renewable Energy Development, Blaenau Gwent County Borough Council and Torfaen County Borough Council (October 2021)</p>
6.8	A copy of the documents are provided at appendix 5
<b>7.0</b>	<b>PUBLICISING THE DNS APPLICATION</b>
7.1	By letter dated 23 <sup>rd</sup> November 2022 PEDW confirmed that the DNS application had been accepted, determined as valid and the application process had commenced.
7.2	BGCBC hereby confirm that, in compliance with Regulation 20 of The Order, the documents required to be placed on the planning register, and described in the PINS validation letter, were placed on the Council's online planning register: <a href="https://www.blaenau-gwent.gov.uk/media/fyifz3vq/week-47.pdf">https://www.blaenau-gwent.gov.uk/media/fyifz3vq/week-47.pdf</a> within the required 5 working days.



7.3	<p>BGCBC also confirm that the site notices issued to them were displayed on site on 29<sup>th</sup> November 2022, in compliance with Regulation 19 and Regulation 25 (2) (c) of The Order. An ordnance survey based plan identifying the location of the site notices and photographic evidence of the site notices as displayed is provided at Appendix 6 and 7.</p>
<b>8.0</b>	<b>IMPACT OF THE DEVELOPMENT ON THE AREA</b>
8.0.1	<u>Landscape and Visual Impact Assessment (LVIA)</u>
8.0.2	<p>The application site is located within the pre assessed area (PAA) for wind, as defined by Future Wales: the national plan 2040. In designating these areas, the Welsh Government has undertaken an assessment to provide certainty where, in principle, developments would be acceptable. As a result, there is a presumption in favour of large-scale on-shore wind energy development and the associated landscape change subject to the criteria in policy 18.</p>
8.0.3	<p>Irrespective of location or scale, the policy advises that the design and micro-siting of proposals must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors. Both within and outside Pre-Assessed Areas, communities should be protected from significant cumulative impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes.</p>
8.0.4	<p>As detailed in appendix 5, TACP, a landscape consultant, was commissioned by BGCBC and Torfaen County Borough Council (TCBC) to assess the sensitivity and potential capacity of their landscapes to wind and solar development. The study follows on from the Carbon Trust Renewable and Low Carbon Energy Assessments that were completed for each Authority in 2020 and which identify potentially suitable areas for both wind and solar power generation.</p>
8.0.5	<p>For the purpose of the study a large turbine is deemed to comprise a tip height 151m to 180 metres at spacing of 0.24 km<sup>2</sup> per turbine with small group comprising 1-3 turbines.</p>
8.0.6	<p>Landscape Assessment Units (LAU) comprising consistent landscape types were developed from LANDMAP landscape aspect areas and visual and sensory data to provide the basis for the assessment.</p>

	<p>The landscape capacity assessment identifies the quantity and type of development that can be accommodated within a given LAU based upon:</p> <ul style="list-style-type: none"><li>• The overall sensitivity to renewable energy development derived from the landscape and visual sensitivity assessments.</li><li>• Operational and consented renewable energy development within and adjacent to each LAU. This also includes consideration of the PAA;</li><li>• The size of each LAU i.e., there may be scope for a larger number of developments within larger LAUs before a capacity threshold is reached. depending on current land use, aspect and topography all of which may be limiting factors to accommodating further development.</li><li>• The agreed development typologies.</li></ul>
8.0.7	<p>The application site is located within LAU 18 and 20. The report advises that the site comprises an area Upland Valleys and Exposed Upland/Plateau.</p>
8.0.8	<p>With regards to LAU 18, the area is deemed to be of high sensitivity with the southern part of the area falling within the PAA for wind development as detailed in Future Wales 2040. Although one of the larger LAU areas, the landscape sensitivity is classified as high due to its undeveloped condition and lack of existing turbines within this landscape unit. The report details that the landform and visual qualities of the area would only be able to accommodate wind development in limited situations.</p>
8.0.9	<p>LAU 20 also comprises a larger area falling within the PAA. However, it includes many steep slopes which may constrain access and development. The landscape sensitivity is classified as medium, meaning the landform and visual qualities of the area would have some potential to accommodate this type of development in particular areas.</p>
8.0.10	<p>The report identifies that individual and small groups of turbines may be considered within this area. However, siting must be carefully considered (recommendations are provided) to avoid cumulative effects with the PAA development.</p>
8.0.11	<p>The landscape and visual impact assessment in support of the application considers the effects of the proposed development on landscape character and visual amenity within a study area up to 28 km from the site. The applicant has advised that the LVIA has been undertaken in accordance with all relevant published guidance on the topic, and has involved desk-based and field-based assessments.</p>

8.0.12	<u>Assessment of effects: LANDMAP Aspect Areas</u>
8.0.13	The reports submitted have assessed the proposal relative to two Geological Landscape Aspect Areas (GLAAs) - Mynydd Carn y Cefn (BLNGWGL013) and Cefn yr Arail (BLNGWGL017). Both are deemed to have a high landscape value; a medium-low landscape susceptibility and an overall landscape sensitivity of medium. However, the magnitude of change arising from the development is deemed to be low with a moderate/ minor to no level of effect. Given the above, it is anticipated that the impact of the proposal on the GLAAs would be neutral.
8.0.14	<u>Landscape Habitats Aspects Areas</u>
8.0.15	Four Landscape Habitats Aspects Areas (LHAA) receptors within the Study Area have been assessed as part of the proposal. At its greatest impact, it is considered that the proposal would generate a low magnitude of change with a moderate to minor level of effect. Given the above, it is anticipated that the impact of the proposal on the LHAA's would be neutral.
8.0.16	<u>Visual and Sensory Aspect Areas</u>
8.0.17	The study has reviewed 40 Visual and Sensory Aspect Areas (VSAA) within the Study Area. Of these, eleven have been identified as likely to experience significant landscape effects. Given the proportion unlikely to be affected the impact of the proposal with this regard is anticipated to be neutral
8.0.18	<u>Historic Landscape Aspect Areas</u>
8.0.19	Of the 60 Historic Landscape Aspect Areas (HLAA) receptors within the study area, two (Hafod Y Dafal and St Illtyds Fieldscape) are considered to experience significant landscape effects as a result of the proposal. Given the number of receptors unaffected, the impact of the proposal with this regard is anticipated to be neutral.
8.0.20	<u>Cultural Landscape Services Aspect Areas</u>
8.0.21	Six Cultural Landscape Services Aspect Areas (CLSAA) have been scoped into the preliminary assessment of effects. Whilst the applicant's submission identifies that no CLSAAs are predicted to

	<p>experience significant landscape effects all would experience a medium magnitude of change and a moderate (potentially significant) level of effect. The effect of the proposal with this regard is anticipated to be negative, not significant.</p>
8.0.22	<p><u>Local Landscape Designations</u></p>
8.0.23	<p>The application site is located within the Mynydd Carn y Cefn and Cefn yr Arail Special Landscape Area (SLA).</p>
8.0.24	<p>The SLAs have been designated to protect areas that are considered to be important to the overall landscape, history, culture, biodiversity and geology of the County Borough. The designation of these landscape areas has been undertaken as a local level, using a regionally agreed methodology and takes into consideration factors such as:</p> <ul style="list-style-type: none"><li>• Prominence;</li><li>• Spectacle- dramatic topography and views;</li><li>• Unspoilt areas- pre-industrial patterns of land use;</li><li>• Remoteness and tranquillity</li><li>• Vulnerability and sensitivity to change;</li><li>• Locally rare landscape; and</li><li>• Special landscapes</li></ul>
8.0.25	<p>The value of the Mynydd Carn y Cefn and Cefn yr Arail SLA is assessed as High to Medium. The susceptibility of the primary landscape qualities and features of the SLA to the type of development proposed is assessed as Medium to High.</p>
8.0.26	<p>Seven of the eight proposed turbines are located within the Southern End landscape type which features characteristics such as a complex landform (i.e the “Distinctive forked ‘stop-end’ to ridge”) and a “Well-preserved pattern of pre-industrial farmland of small rectangular fields with distinctive stone walls and overgrown beech hedges” with a management guideline to “conserve remoteness and tranquillity”, all of which are physical and perceptual characteristics that are more susceptible to wind farm development. The remaining turbine would be sited within the Open Upland Ridge landscape type whose visual characteristics include a “distinctive open skyline seen from valleys on either side” and where the “Main length of open upland is away from evidence of industrialisation”. As a consequence, the overall sensitivity</p>

	<p>of this landscape to a wind farm development is assessed as High (High to Medium value and Medium to High susceptibility).</p>
8.0.27	<p>As noted in section 6.11.1 of the applicant's submission, as the SLA would host all eight proposed turbines plus the access tracks and the ancillary elements it would experience direct effects and the operational turbines would be a dominant landscape element across the SLA, with the exception of the northern slopes, far northern section of the Open Upland Ridge landscape types and parts of the Ebbw Fawr Valley Sides which lie outside of the ZTV.</p>
8.0.28	<p>Although the field pattern across the Southern End would be largely maintained, the distinctive landform would become dominated by the turbines due to their scale, number and elevated location. The open skyline with its absence of industrialisation would also be significantly altered by the proposal. The alteration to a proportion of some of the primary landscape qualities and features as a consequence of the introduction of uncharacteristically large-scale elements would give rise to a Medium to High magnitude of change across the Southern End and Open Upland Ridge landscape types defined within the SLA, which would change to a Low to Zero magnitude across the wooded Ebbw Fach and Ebbw Fawr valley sides and across the far northern slopes where the primary landscape qualities and features would be unaffected. The level of effect would therefore range from Major and Significant to None and Not Significant. The nature of these effects would be long-term (reversible), direct, and adverse.</p>
8.0.29	<p>Given the above, it is anticipated that the impact on the turbines due to the size, scale, density of provision and the undeveloped area within the SLA would have a negative impact on the designation.</p>
8.0.30	<p>The Mynydd Carn y Cefn and Cefn yr Arail SLA is also host to the grid connection corridor which would cross the Southern End landscape type. The "Steep densely forested sides gives very enclosed character to valley" are amongst its primary qualities and features. The applicant's submission concludes the loss the trees within the wayleave would not be uncharacteristic given that this is actively managed forestry whilst the introduction of the grid connection and wooden poles would have limited characterising influence beyond the immediate grid connection corridor.</p>
8.0.31	<p>Given the regular spacing of wooden poles through the wayleave, in close proximity to the straight vertical tree trunks of the coniferous</p>

	<p>forestry trees would reduce visual contrast, the magnitude of change has been assessed as very Low. Given the actively managed context of the site, it is anticipated that impact of the grid connection would be neutral.</p>
8.0.32	<p><u>Indirect landscape effects on SLAs and Visually Important Local Landscapes</u></p>
8.0.33	<p>Of the 16 local landscape designations entirely or partly located within 10km of the proposed turbines which have been scoped into the assessment of landscape effects, significant landscape effects are predicted for the following SLAs and/ or Visually Important Local Landscapes (VILLs):</p> <ul style="list-style-type: none"><li>• Eastern Ridge and Mynydd James SLA;</li><li>• Cwm Tyleri and Cwm Celyn SLA;</li><li>• Cefn Manmoel SLA;</li><li>• St. Illtyd Plateau and Ebbw Eastern Sides SLA; and</li><li>• Manmoel VILL.</li></ul>
8.0.34	<p>With regard to the designations closest to the site (Eastern Ridge and Mynydd St James Cwm Tyleri and Cwm Celyn), it is noted from the applicant's submission that the turbines could appear as a new prominent sometimes dominant feature on the skyline and views out of the valley. These would contrast with the small-scale valley landform and could reduce the strong rural character and hidden tucked away qualities of the landscape.</p>
8.0.35	<p>It is therefore anticipated that the size, scale, visual prominence and dominance of the on the turbines would have a negative impact on the designations.</p>
8.0.36	<p><u>Assessment of visual effects</u></p>
8.0.37	<p>With regards to visual effects the applicant's submission has reviewed the proposal relative to 104 receptors comprising settlements (both within and outside the BGCBC boundary), recreational routes (national/ regional), locally promoted recreational routes, recreational and tourist designations and A and B classified highways. Of these receptors 41 would experience significant effects.</p>
8.0.38	<p>Of the 14 settlements that would experience significant effects 11 are within the BGCBC. It has been determined that views in the direction</p>

	<p>of the sites from these receptors are generally medium to high value with all having a high sensitivity with residents within these locations having a High susceptibility to change. Whilst the magnitude of change experienced, would range from zero to high as to be expected the impact experienced is affected by intervening landforms, buildings, tree or vegetation cover, the overall orientation of the settlement and dwellings and elevation. In conjunction with the above factors the level of effect would range from no effect to major. Of the 11 settlement the effect would be not significant for four (36.3%), potentially significant for 1 (9.09%) and significant for 6 (54.54%) with the nature of the effect being long-term (reversible) indirect and adverse. It is therefore anticipated that the impact of the proposal would be negative.</p>
8.0.39	<p><u>Residential Visual Amenity Assessment (RVAA)</u></p>
8.0.40	<p>A Residential Visual Amenity Assessment (RVAA) has been undertaken for the closest settlements and individual dwellings outside of settlement boundaries but within 2km of the proposed turbines and the blade tip zone of theoretical visibility.</p>
8.0.41	<p>The RVAA concludes that the Proposed Development would not have an overbearing effect or otherwise affect the living standards of individual properties such that any of these would become an unattractive place to live (as opposed to less attractive) when judged objectively. This is due largely to the intervening distance, topographical screening and the set back of the turbines from the edge of the ridge, to the extent that the submission concludes that the living standards would not be affected and the property would not be adversely affected by 'visual dominance' to such an extent that it would become an unattractive place to live when judged objectively and in the public interest. However, given the number of receptor dwellings in the study area, the density of occupation in conjunction with location specific environmental, topographical and social conditions, it is anticipated that the impact of the proposal would be negative.</p>
8.0.42	<p><u>Visual effects from promoted long-distance footpaths and cycle routes</u></p>
8.0.43	<p>With regard to the two long-distance, promoted footpaths (Ebbw Valley Walk and the Sirhowy Valley Ridgeway Walk) which run through BG CBC, it has been determined that the views in the direction of the site are high and are subject to high sensitivity. As a result of intervening landform and screening provided by vegetation the magnitude of change would range from zero to high with the resulting</p>

	level of effect ranging from no view to major and significant. The nature of the effect would be long-term (reversible), indirect and neutral to adverse. Given the known and perceived vulnerability of users and the scale of the development, it is anticipated that the impact of the proposal would be negative.
8.0.44	National Cycle Route 465, 466 and 467 connect Llanhilleth in the south with Brynmawr to the north (465); Aberbeeg with Rassau (466) and Blackwood with the Sirhowy Valley (467).
8.0.45	In all three cases it is determined that cyclists have a high susceptibility to change. Views in the direction of the site are deemed to be medium value with a high sensitivity and a magnitude of change ranging from no change to high, for selective sections. The resulting level of effect would range from no effect for the majority of the routes to major and significant for a 0.7km stretch along the 456. The nature of the effect would be long-term (reversible), indirect and adverse. Given the modest length of the paths subject to major and significant effects, on balance the anticipated impact is considered neutral.
8.0.46	<u>Assessment of visual effects from Historic Parks and Gardens, Golf Courses, Country Parks, PRow, and Open Access Land</u>
8.0.47	With regards to the above assessed receptors it is noted that Brynbach Parc Open Access land and numerous PRow fall within the 5km-10km buffer of the proposed turbines.
8.0.48	Although users of Brynbach Parc have a High susceptibility to change and the views in the direction of the Site are assessed to be of Medium to High value resulting in an overall High sensitivity. The magnitude of change would range from Zero to Low and the resulting level of effect would range from No View to Moderate and Not Significant given the limited and restricted nature of views from the park. The anticipated impact is therefore likely to be neutral.
8.0.49	In terms of designations within 5km of the site it is noted that a large proportion of the upland land landscape to the north and east of the Site, above the settlements in the valleys is designated as open access land and also contains a high density of PRow.
8.0.50	High points where the proposed development would be prominent include Cefn Yr Arail in close proximity to the northernmost turbine, Mynydd Carn y



	<p>Cefn to the north, Mynydd James, Coety Mountain and Twyn Pentre to the northeast. Unrestricted views would also be available from parts of the open access land and PRow at Cefn Manmoel and Darrne Ddu to the northwest and elevated land to the east and southeast of Abertillery. Views would also be available of the access tracks and grid connection poles.</p>
8.0.51	<p>Users of the open access land have a High susceptibility to change and the views in the direction of the Site are assessed to be of Medium to High value resulting in an overall High sensitivity. The magnitude of change would range from Zero to High. The resulting level of effect would range from No View to Major and Significant. The nature of the effects experienced by users of the open access land would be long-term (reversible), indirect and neutral to adverse. The anticipated impact of the proposal is therefore likely to be negative.</p>
8.0.52	<p>With regard to designations within 5-10km of the site the applicant's submission details that a proportion of the upland landscape to the north and west of the Site is designated as open access land that falls within the ZTV.</p>
8.0.53	<p>Users of the open access land have a High susceptibility to change and the views in the direction of the Site are assessed to be of Medium to High value, resulting in an overall High sensitivity. Locations within the County Boundary where the Proposed Development would be clearly visible with hub visibility include, Mynydd Bedwellte and Rhymney Hill. At these locations, the magnitude of change would range from Zero to Medium or High/Medium. The resulting level of effect would range from No View to Major or Major/Moderate and Significant. The nature of the effects experienced by users of the open access land would be long-term (reversible), indirect and neutral to adverse. The anticipated impact of the proposal is therefore likely to negative and significant.</p>
8.0.54	<p>Of the locally promoted walking routes assessed within 5km it is noted that the walkers on the routes have a High susceptibility to change and the views in the direction of the Site are assessed to be of High value resulting in an overall High sensitivity. The magnitude of change would range from Zero up to High where less restricted views are available. The resulting level of effect would range from No View to Major with 90 of the routes experiencing a significant impact. The nature of these effects would be long-term (reversible), indirect and neutral to adverse. The anticipated impact of the proposal is therefore likely to negative.</p>

	<p>With regard to the Transport Routes (A and B roads) assessed that fall within the County Boundary, it is noted that users would have at worst a medium susceptibility to change with views in the direction of the site being of medium to low value resulting in an overall medium sensitivity. Typically, there would be no change from the routes. The resulting level of effect would range from No Effect from the majority of the route to Minor and Not Significant. The anticipated impact of the proposal is therefore likely to be neutral.</p>
8.0.55	<p><u>Assessment of Cumulative Effects</u></p>
8.0.56	<p>Cumulative effects can arise from the construction and operation of other wind farms. The Proposed Development is located within 3.1km of three proposed Developments of National Significance (DNS) wind farm applications which are at scoping stage – Mynydd Llanhilleth wind farm (12 turbines), Abertillery wind farm (7 turbines), Manmoel wind farm (5 turbines) – and within 10km of 5 consented wind turbines and one 1 turbine at the planning application stage.</p>
8.0.57	<p>There are 66 wind energy developments in total within 28km of the Proposed Development (comprising 17 consented turbines, 217 operational turbines, 3 turbines in planning and 58 turbines at scoping stage). The largest operational wind farm is Mynydd Bwllfa (comprising 9 turbines) which is some 23.5km from the current proposal.</p>
8.0.58	<p>Of the receptors analysed with regards to cumulative impact it is noted that 80% are deemed to have a high sensitivity to change with the remaining 20% being medium.</p>
8.0.59	<p>With regards to the magnitude of scale 29.5% of receptors are graded as high, 8.1% High-Medium; 6.5% medium-high; 50.8% medium; 1.63% Medium to low and 3.2% low.</p>
8.0.60	<p>In relation to the significant of the impact of the proposal, 32.7% of receptors were graded as Major; 4.9% as Major- major/moderate; 44.2% as major/ moderate and 18.0% as moderate. 100% were graded as a significant impact.</p>
8.0.61	<p>Policy 18 of Future Wales specifies that proposal must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors. Both within and outside Pre-Assessed Areas, communities should be protected from significant cumulative</p>

	impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes.
8.0.62	When reviewing the proposal relative to operational windfarms, consented turbines plus those within the planning and scoping stages plus the landscape sensitivity which is classified as high due to its undeveloped condition and lack of existing turbines within the landscape unit, it is anticipated that the cumulative impact would be negative.
8.0.63	In summary the development will introduce eight 180m high wind turbines into an SLA and wider landscape that is designated for its unspoilt areas- pre-industrial patterns of land use, remoteness and tranquillity and vulnerability and sensitivity to change
8.0.64	The Council anticipate that the introduction of substantial new manmade prominent and dominant structures into the landscape, skyline and views out of the valley, that would contrast with the small-scale valley landform, could reduce the strong rural character and hidden tucked away qualities of the landscape. Further it is noted that the insufficient information has been submitted with regards to the programmed felling of coniferous forestry and the implication this could have on the localised landscape and changes to the nature of available views to a number of visual receptors within the LVIA study area
8.0.65	It is therefore anticipated that the size, scale, elevated position, visual prominence and dominance of the on the turbines would have a negative impact upon the landscape character areas within BGCBC.
<b>8.1</b>	<b>Impact on Biodiversity</b>
8.1.1	The proposed development site comprises semi-natural and improved habitats including improved grassland, species poor semi-improved grassland and semi-improved acidic grassland, dry heath/ acid grassland and areas on continuous bracken. Within the site specific boundary there is a large number of mature tress scattered throughout the grassland and along the field boundaries.
8.1.2	The surrounding area is dominated by managed forestry comprising conifer plantations immediately adjacent to the western and north-western boundaries and in between the forked upland ridges with areas of larch, Scots pine and Sitka spruce.

8.1.3	On the north-west and south-eastern boundaries there is semi-natural broad leaved woodland with high canopies.
8.1.4	There are four statutorily designated nature conservation sites- three special Areas of Conservation (SACs) and one Site of Special Scientific Interest (SSSI) within the 2km and 10km study area, plus the Usk Bat Sites SAC to the north and numerous SINC sites as referred to in subsection 4 above. Ancient Woodlands are also present within and immediately adjacent to the site.
8.1.5	A Phase 1 Habitat Survey, Preliminary Ecological Appraisal, Bat, Reptile Dormouse surveys have been submitted as part of the Environmental Statement. The Council's Ecology Officer has reviewed the submitted reports and has provided the following response:
8.1.6	"The survey efforts and methodology as undertaken are robust and it is considered that no further surveys are required. However, it is noted (and as agreed as part of consultation meeting held with the applicant in March 2022) that the Habitat Management Plan (HMP) should include a level of invertebrate monitoring.
8.1.7	As there are lesser horseshoe bats and roost sites on the proposed development site and the potential connectivity with the Usk bat site SAC a Habitats Regulation Assessment (HRA) was undertaken. As a result of lower recorded levels of activity and lower collision risk of the species, the HRA concluded there would be no significant effect on the integrity of species. It is therefore anticipated that the impact on the less horseshoe bats could be neutral.
8.1.8	As specified in the submission, it is agreed that the magnitude of change on the USK Bat site SAC would be negligible, not significant, with the bat surveys recording low activity levels (recorded at 6/8 turbine sites) and Lesser Horseshoe Bats being considered a lower collision risk species.
8.1.9	However, it is noted that common pipistrelles, soprano pipistrelles and noctule bats were recorded on site. These species are considered high collision risk and likely to experience increased mortality as a result of barotrauma <sup>1</sup> . Four of the turbines are considered as high risk for collision (turbine locations 2, 5, 7 and 8). The report suggests that

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<sup>1</sup> 1 Damage to lungs caused by air pressure variations associated with the blades of the turbines

	<p>“measures include a minimum measure of 50 m standoff between all turbine blade tips and nearest point of liner/forage feature”.</p> <p>8.1.10 Guidance provided by Natural England Technical Information Note: TIN051, recommends turbines should be situated a minimum distance of 50m from the tip of blade, away from any linear feature e.g. tree/woodland lines, hedgerows etc.). Therefore, it is necessary to calculate the distance between the edge of the feature and the centre of the tower to ensure a reasonable buffer zone. With a three bladed rotor diameter of up to 150m, a hub height of up to 105m and a max height to blade tip of 180m significant concerns are raised as to whether a minimum distance of 50m is sufficient. The recommended buffer should be calculated using the formulae within the TIN 051. There is no evidence of the formula being used to calculate the recommended buffer. It is therefore considered that the location of 6, 7, and 8 fails to meet the minimum requirements of 50m distance. Furthermore, a greater minimum distance may be required in this instance due to the scale of the proposed turbines.</p> <p>8.1.11 At this time, it is considered that insufficient information has been submitted to justify and determine the location of the turbines. It is therefore anticipated that the development will have a negative impact on the population of protected species within the site.</p> <p>8.1.11 Based on the details submitted it is noted that a hibernation and summer day roost for pipistrelles was located 337m away in built structure B3 with very high levels of foraging and commuting activity across all areas of the site, throughout the season. As a result of the proximity of the turbine to the hibernation and summer day roost, the high levels of recorded activity and high collision risk of the species, it is anticipated that turbine 8 would have a negative impact on the population of protected species within the site.</p> <p>8.1.12 It is noted that the majority of the SINCS surveyed are in poor condition and degraded. Of the nine SINCS surveyed three would contain at least one turbine with two further SINCS accommodating access tracks of the route or the grid connection corridor. The overall magnitude of change is deemed to be negligible, low or very low. Whilst some temporary and permanent loss of habitat will be experienced, generally the habitats are common and widespread across the site. In comparison to the retained areas of the SINC and the generally low ecological value of the habitats, it is anticipated that the proposal would have no effect on</p>
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	<p>the integrity of the conservation status of the SINCS with the scale of impacts being anticipated as not significant.</p>
8.1.13	<p>Given the mitigation and compensation measures proposed there is the opportunity to enhance the ecosystem resilience of the designated SINCS not only as a habitat but also for associated species. Areas of heathland should also be restored and improving connectivity of this habitat. It is therefore anticipate that the proposal would have a positive impact in this regard.</p>
8.1.14	<p>At the time of EIA scoping consultation comments (May 2021) BGCBC had not been aware that there are at least a further four potential applications for DNS windfarms in or adjacent to the southern part of the authority. If all DNS were approved and given the go ahead this would result in a total of 42 wind turbines. Therefore, the proposal needs to take into consideration in combination of the likely significant effects with the other proposed wind farm schemes. As a result, concerns are raised that in combination, this may have a detrimental impact to protected species; especially bird species (schedule 1 species have been recorded on site). These larger scale wind farms are in the early stages of application, so detailed assessments including Collision Risk Monitoring (CRM) is not available for any of these sites. As a result, it is difficult to make a fully informed assessment of the in combination effect. However, if all DNS windfarms were in operation this would evidently result in scale of magnitude change, resulting in long term negative effects through habitat fragmentation and increased collision risks (and direct effects upon local population sizes). Therefore, the cumulative impact would be negative and further consideration is needed in the absence of this information.”</p>
8.1.15	<p>To conclude it is anticipated that the development proposed would have a positive impact on the ecological value of the SINCS and a neutral impact on the USK Bats SAC. However, it is considered that the information provided within the application submissions is insufficient / inadequate to allow a full assessment to be made of the impact this proposal and the cumulative effects of other DNS applications in the immediate vicinity, would have upon biodiversity, most notably on specific species of bats and schedule 1 species recorded on the site. Accordingly, it is anticipated that the proposal would have a negative, significant impact.</p>
<b>8.2</b>	<b>Highways</b>

<b>8.2.1</b>	It is anticipated that public highways A4046 (Ebbw Vale); A4046 (Aberbeeg): and A467 (Brynithel) would be used by all construction and operational traffic generated by the proposal.
8.2.2	Site specific access would be gained via the existing forestry haul road with adjoins with the A4046, approximately 1.8 km north-west of the A467/A4046/Aberbeeg Road/B471 junction. The A4046 operates under the national speed limit in the vicinity of the site access. The site access route approach to the A4046 is on a relatively steep gradient.
8.2.3	At this stage, it is assumed that Swansea seaport would be used to deliver abnormal loads. Based on the Abnormal Indivisible Loads (AIL) access study, likely AIL routes are identified as follows:
8.2.4	AIL Route Option 1 (preferred): Swansea Docks – Baldwins Crescent – A483-A483/Ffordd Amazon/Ashleigh Terrace Roundabout - A483-A483/M4 - M4 - A4051 - A4042 - A4042 Turnpike Road - A472 - A467-A4046 - Site.
8.2.5	AIL Route Option 2: Swansea Docks – Baldwins Crescent – A483 - A483/Ffordd Amazon/Ashleigh Terrace Roundabout - A483 - A483/M4 - M4 - A4051 - A4042 - A4042 Turnpike Road - A465 Heads of the Valleys Road - A467 - A4046 – Site.
8.2.6	Following detailed analysis of the A4046 (Ebbw Vale and Aberbeeg), the applicant's submission concludes that the traffic generated by the proposal would not lead to any significant severance or separation of people from places and other people. Relative to existing volumes the increase in traffic due to the proposed development would be negligible. The ability of people to cross roads and the effect on the relative pleasantness of a pedestrian journey would be negligible. The levels of fear and intimidation experienced by pedestrians and cyclists, as a result of the developments proximity to people or the lack of protection caused by such factors as narrow pavement widths would also be negligible. Finally, following review of records of personal injury accidents (PIAs) obtained from the CrashMap database ( <a href="https://www.crashmap.co.uk">https://www.crashmap.co.uk</a> ) which uses information collected from the Police, no accident hot spots have been identified on this link. As such there are no existing highway safety issues that would be exacerbated by the construction vehicle movements associated with the construction of the proposed wind farm.

8.2.7	The Highways Authority has been consulted and advised that the information supplied is sufficient and they have no objection to the proposal subject to conditions requiring the submission of a Construction Traffic Management Plan, Traffic Management Plan. As such it is considered that the development would have a neutral impact upon the highway network and upon highway and pedestrian safety.
<b>8.3</b>	<b>Noise Impacts</b>
8.3.1	As part of the submission the applicant has carried out a noise impact assessment using government approved guidance ETSU-R-97 and the Institute of Acoustics Good Practice Guides.
8.3.2	In order to determine the existing background noise climate, the applicant has carried out noise monitoring in the vicinity of sensitive receptors within a 10km radius of the proposed. The applicant has then compared these background noise levels at varying wind speeds with the predicted noise impact from the turbine at the nearest sensitive receptor on 20 locations
8.3.3	From this assessment the applicant has concluded that the installation of the wind turbines at Mynydd Carn-y-Cefn will result in noise emissions at the nearest residential properties at to the west that fall below the levels in ETSU-R-97 and fall below the underlying background noise levels with the exception of one location at 3 wind speeds where slight exceedances have been predicted.
8.3.4	The conclusions provided are considered to be robust and as such it is anticipated that subject to the imposition of mitigation to control the effect on the one location, the proposal would have a neutral effect.
<b>8.4</b>	<b>Shadow Flicker</b>
8.4.1	The shadow flicker assessment comprises a numerical modelling of the proposed turbines and receptors within the defined study area. The applicants have used an industry standard software package to undertake the modelling. The assessment is based on turbines with a rotor diameter of up to 150m and a 50m micro siting, giving a total study area of 1550m.
8.4.2	20 receptor locations throughout the study area were analysed with the details given at Figure 15.1 of the applicant's submission. The closest receptor area is located 528m from the application site. Due to the



	<p>number of properties within the study area, a number of properties were chosen to illustrate the potential effects of shadow flicker. As many of the properties are grouped closely together and experience similar levels of potential effect, a sample property was chosen from each group. The representative property has the highest predicted levels of effect within the group.</p>
8.4.3	<p>Based on the detailed results of the model, receptors 1, 2, 3, 6, 7, 9, 10, 11, 12 and 14 would not experience any shadow flicker as a result of the development. It is noted that these receptors are generally located to the west and south-east of the site. The remaining 10 receptors would experience between 11.2 and 59.8 hours of shadow flicker per year, based on the worst case model. A worst-case model assumes each property is occupied, that there are windows or doors facing the turbines, that there are not intervening obstructions, that the sun shines throughout the daylight hours, that the wind blows constantly within the operating parameters of the turbine and that the rotor is always orientated towards the receptor.</p>
8.4.4	<p>It is noted that 6 out of 10 of the effected receptors (15, 16, 17, 18, 19 and 20) are located 535-1292m to the north-east of the site within one of the most densely populated areas of the Borough.</p>
8.4.5	<p>Receptor locations 4, 5 and 8 are rural and could experience between 11.2 and 12.9 hours of potential shadow flicker per year. The effect is therefore deemed to be low and not significant.</p>
8.4.6	<p>Receptor location 8 is again rurally located and set slightly higher than the base location of turbines 6, 7 and 8. The receptor could experience up to 59.8 hours per year of potential shadow flicker. The effect is therefore deemed to be medium and significant</p>
8.4.7	<p>As specified above receptor locations 15, 16, 17, 18, 19 and 20 are located within one of the most densely populated areas of the Borough. The model suggests that the representative property for this group of receptors (ie the receptor that has the highest predicted levels of effect within the group) would experience an effect from turbines 1, 2, 4 and 5 and could experience up to 57.1 hours of potential shadow flicker per year. This effect is deemed to be medium and significant.</p>
8.4.8	<p>In order to mitigate the impact of the effect on receptor locations 8, 15, 16, 17, 18, 19 and 20 it is proposed that a control system/ module be installed which can be programmed to shut down the wind turbine to</p>

	<p>restrict effects to less than 30 minutes per day and / or 30 hours per year at any property. Once this mitigation is taken into consideration the effect is deemed to be low to medium in magnitude and not significant.</p>
8.4.9	<p>It is therefore concluded, subject to conditions requiring the control module to be installed in order to limit the potential shadow flicker effect, the anticipated impact of the development would be negative, not significant.</p>
<b>8.5</b>	<b>Contamination</b>
8.5.1	<p>The phase 1 geo environmental desk study submitted as part of the application has identified some potential pollutant linkages within the site arising from a former licensed landfill and other potential landfill areas, residual mine waste from onsite surface workings, made ground, historical farm operations including use of fuels/oils, agricultural chemicals such as pesticides, dilapidated farm buildings with possible asbestos content which may be released as asbestos fibres to ground, mine gas from former deep workings on the site and ad hoc use of the northern area of the Site for motorbike scrambling.</p>
8.5.2	<p>The submission therefore recommends that a Phase 2 intrusive geoenvironmental ground investigation be completed at the pre-construction stage to assess the presence of and characterise the soil chemistry at target areas and in shallow soils (top 0.3m) that could be subsequently mobilised by vehicles movements and construction activities, completed in accordance with the Environment Agency Land Contamination Risk Management guidance.</p>
8.5.3	<p>The assessment will determine whether the soil is suitable for use and this information will inform the materials management plan. If material is not suitable for use, then it will be disposed of offsite in accordance with the Waste Management Regulations.</p>
8.5.4	<p>It is indicated that potential risks to human health from any known, suspected or unexpected ground contamination will be avoided by adopting appropriate working methods and all aspects of construction will be completed in compliance with the Construction (Design and Management) Regulations 2015, CAR 2012 and the Health and Safety at Work Act (1974) and regulations made under the Act. These legal obligations include the requirement for risk assessments and method statements for all construction related activities and the use of</p>

	appropriate working methods, training and Personal Protective Equipment (PPE).
8.5.5	The application has been assessed by BGCBC's Land Contamination Officer who has concluded that the reports submitted are sufficient and supports the recommendation with regards to the need for an intrusive Phase 2 report. Standard conditions with regards to unforeseen land contamination are recommended.
8.5.6	In light of the reports submitted and conditions recommended, it is anticipated that the issues and impacts relating to land contamination would have be neutral.
<b>8.6</b>	<b>Ground Conditions and Stability</b>
8.6.1	The Phase 1 Geoenvironmental desk study and the Coal Mining Risk Assessment have identified that there is evidence of shallow mining related risk in the north of the site and a more widespread risk of displacement has been identified based on the occurrence of subsidence and fissuring/ fault reactivation across the site. Although there is no record of any recent subsidence, either anecdotal or from the Coal Authority. The council are aware of a recorded landslip 1.5km to the north of the site. Appendix x refer
8.6.2	Figure 11.1 of the applicant's submission indicates the location of a number of fault lines crossing the site with turbines 1, 2, 5 , 6 and 7 being positioned in close proximity. The notes associated within the figure specify:
8.6.3	<i>"There is evidence of subsidence and fissuring in several areas of the site. This does no corresponds directly to recorded or suspected shallow mining, which indicates that displacement many be associated deeper working, possibly as a result of fault reactivation and or lateral spreading.</i>
8.6.4	<i>Bedrock is shallow across the entire site. It is not known whether bedroll has a weathered upper layer which may require deepening of foundations.</i>
8.6.5	<i>Details provided at 11.5.10-12 clarify that the British Geological Survey (BGS) 1:50,000 scale geology mapping, GeoIndex Onshore map and BGS sheet 1:50 000 Abergavenny Sheet 232 Solid and Drift 1990 shows superficial deposits as thin or absent within the Proposed</i>

	<p><i>Development Site, that bedrock is generally close to surface (&lt;10m below ground level) or at surface; that bedrock geology on the site comprises the Hughes Member of the Pennant Sandstone Formation, which is described as “green-grey, lithic arenites ..., with thin mudstone/siltstone and seatearth interbeds, and mainly thin coals and a landslip and area of foundered strata (collapsed rock) in Cwm Big just beyond the southern boundary of the Proposed Development Site.”</i></p>
8.6.6	<p>To allow the potential subsidence risk to be better understood, further desk based investigations are recommended in the Coal Mining Risk Assessment, which will require intrusive investigations during the pre-construction phase eg boreholes that will clarify the extent or form of remediation that may subsequently be needed as well as the form and scale of the foundation</p>
8.6.7	<p>Following consultation, the Councils Geo-Technical Officer has confirmed that there are fissures atop the Carn y Cefn, and evidence of previous movement. Mitigation measures recommended as part of previous GEO landslip report (Appendix 2) recommended the provision of enhanced drainage and the provision of additional tree planting within the area.</p>
8.6.8	<p>Whilst the applicant has recommended the submission of further ground conditions be secured by condition, being mindful of known subsidence, fissures and fault lines within the site, in conjunction with areas of made up ground and the underlying sandstone bedrock, it is considered that insufficient information has been supplied to allow a full assessment to be made of the construction, the potential effect of operational vibration and any remediation required to mitigate the risks of adverse stability within the site and wider area. Given the proximity of the proposal to densely populated urban areas, it is considered that additional information with regard to this matter is required prior to determination. It is therefore anticipated that the development could have a negative and significant impact.</p>
8.7	<p><b>Minerals</b></p>
8.7.1	<p>The redline boundary of the application site is located within a minerals safeguarding area for sandstone (LPD Policy M1); a buffer zone for the open cast coal recovery operation at Six Bells (LDP Policy M2) and encompasses the majority of an allocated mineral resource preferred area and its associated buffer zone (M4).</p>

8.7.2	With regards to LDP Policy M1, the safeguarding area seeks to ensure that no known resources are needlessly sterilised by permanent development (LDP DM19).
8.7.3	Mineral buffer zones, allocated by LDP Policy M2 are drawn around all quarries and mineral operations including dormant sites. The purpose of the buffer zone is to safeguard mineral reserves for future working, by ensuring they are not sterilised by alternative development, but also to ensure the environmental effect of quarrying/ mining do not adversely affect sensitive development.
8.7.4	In order to meet the required resource allocation, Policy M4 of the LDP identifies three Preferred Areas and associated buffer zones. The justification of the policy defines Preferred Areas as “areas of known mineral resources with some commercial potential, and where planning permission might reasonably be expected”. The policy identifies three preferred areas, the last being the land south east of Cwm (designation M4.3) which would be affected by the proposal.
8.7.5	The Regional Technical Statement (RTS) 2nd Review (September 2020) seeks to provide a mechanism for encouraging the national sustainability objectives relating to minerals to be met by the individual Local Planning Authorities within each region over a period of up to 25 years (for crushed rock) or 22 years, in the case of land-based sand & gravel (sufficient to cover the Minerals Technical Advice Note 1: Aggregates requirements for maintaining minimum landbanks of 10 years and 7 years, respectively, throughout the full 15-year term of each LDP).
8.7.6	The RTS provides specific recommendations to the constituent LPAs regarding the quantities of aggregate which need to be supplied from each area (apportionments) and the nature and size of any allocations which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant Plan Period.
8.7.7	Table 5.7 of the RTS specifies BGCBC Overall ‘Preferred’ Apportionment (Sand and Gravel and Crush Rock) as 0.201 million tonne (mt) of which 100% is historically supplied from crushed rock sources. The new annualised apportionment for crushed rock was set as 0.201mt given a total apportionment of 5.027mt required over 25 years. With existing permitted reserves at the end of 2016 of 1.320 mt <sup>4</sup> , and existing land bank of 6.6 years the authority has a shortfall of surplus or Shortfall (-) of existing permitted reserves of -3.707mt, with

	<p>a minimum allocation of 3.707mt needed to meet required provision. However, figure subsequently published by Welsh Government on the 11th November 2021, as part of a correction to the RTS, increased BGCBC apportionment by a further 3,373 tonnes per annum or an additional 0.085 million tonnes more over 25 years</p>
8.7.8	<p>Data supplied as part of the South Wales Regional Aggregates Working Party Annual report for 2019 (published May 2021) identified that the land bank for Blaenau Gwent has fallen to 3 years, giving a shortfall of 22 years and seven years less than the minimum 10 years required at any point in the plan period.</p>
8.7.9	<p>At this time, the data and recommendations contained in the RTS and the increased apportionment requirements issued in November 2021, reinforces the need to identify and retain the Preferred Areas as part of the LDP review and confirms that that the release of additional reserves are highly likely to be required during the replacement plan period.</p>
8.7.10	<p>It is believed that the designated area contains a potential reserve of between 50 and 60 million tonnes of high Polished Stain Vale (PSV) Sandstone. PSV is a high specification aggregate (HSA) sandstone used in road construction and repairs due to its ability to provide particular levels of surface skidding resistance and durability. Although relatively plentiful in Wales, it is unavailable in some parts of the UK and its importance in road construction justifies transportation over long distances. Although more detailed studies would be required as part of a planning application to determine the suitability of the land for extraction, the allocation would make a significant contribution towards the overall mineral need identified in the LDP and a national need for HSA sandstone.</p>
8.7.11	<p>Policy DM19 of the LDP does not permit development which would permanently sterilise important mineral resources within safeguarded areas. Exceptions are made in certain circumstances which include “the scale and location of the development would have no significant impact on the possible working of the resource” or “it is temporary development and can be implemented and the site restored within the timescale the mineral is likely to be required”. The justification of the policy gives further guidance and states that “In most instances, development may proceed within safeguarding areas as long as developers demonstrate the resource in question is of poor quality/quantity and not economical to exploit, or the nature of the development in question would not prejudice exploitation of the</p>

	<p>resource”. In addition, Policy M2 of the LDP states that within a mineral buffer zone “any proposed development that would prejudice the extraction of the mineral or operation of the site will be refused”.</p>
8.7.12	<p>As there is no current application on the site, the applicant has chosen to screen out minerals from the Environmental Statement. However, the Council are aware of ongoing discussions to develop a quarry within the Preferred Area. Whilst the absence of information regarding the potential future working of the Preferred Area means the allocation must be reviewed cautiously, as part of the previous Planning Inquiry for the site (Application No. C/2013/0295 and appeal decision APP/X6910/A/15/2230097 refer), it was determined that the scale of the operation could be in the region of 2 million tonnes per annum, with extraction beginning on the eastern boundary.</p>
8.7.13	<p>An anticipated operational lifespan of 30 years would bring the end date of the permission to approximately 2056 This would be in excess of the replacement plan period (15 years) and the 10 year landbank required at the end of the plan. Given other ongoing circumstances regarding the identified reserves at Trefil and Tir Pentwys it is highly likely that the reserve at Cwm will be needed if an adequate landbank and supply it to be is to be maintained. Although the time period of the proposed development would be limited, it would not have expired and the site restored before such time as the mineral is required.</p>
8.7.14	<p>The micro siting of turbine 6 would be within the 200m Buffer Zone around the Preferred Area as would the internal site access serving turbines 1, 2, 3, 4 and 5. Whilst it is acknowledged that the micro siting of turbine 6 could be restricted to prevent encroachment, concerns are raised regarding the potential to relocate the access as a result of the topography.</p>
8.7.15	<p>Whilst paragraph 11.5.22 of the applicant’s submission specifies: <i>“Given that there are no known proposals for mineral extraction at the Proposed Development Site and that the wind farm development footprint would only occupy a small proportion of the Proposed Development Site effects on minerals have been scoped out of the EIA.”</i></p>
8.7.16	<p>On the basis of the above, it is of the LPA’s opinion that the application has failed to acknowledge and appropriately consider the implications of the designations or demonstrate the impacts the proposal would have upon the current and likely future mineral designation and</p>

	<p>extraction. Given the close proximity of turbine 6 and the route of the primary access within the defined buffer zone, it is considered that the insufficient information has been submitted to demonstrate that the proposal would not have a detrimental impact. It is therefore anticipated that the proposal would have a negative, prejudicial and sterilising impact on the extraction of the mineral resource.</p>
<b>8.8</b>	<b>Cultural Heritage and Historic Environment</b>
8.8.1	<p>An Archaeological desk based assessment has been provided to inform the proposal. The study encompasses a 1km study area from the site boundary to identify heritage assets which may be subject to potentially significant direct effects and a 5km from the site boundary to identify heritage assess that may be subject to potentially significant indirect effects.</p>
8.8.2	<p>The report determines that there are 18 records of non-designated historic assets within the site boundary as detailed in table 7.7 and figure 7.1 of the applicant's submission. There are no designated historic assets within the site boundary.</p>
8.8.3	<p>One scheduled monument and six listed buildings are located within the 1km study area. Details are provided a Table 7.8 of the applicant's submission.</p>
8.8.4	<p>There are no conservation areas, World Heritage sites or registered parks and gardens within the 1 km study area.</p>
8.8.5	<p>With regard to Prehistoric, Roman and Medieval buried remains, the report identifies one potential archaeological record from the prehistoric period within the site boundary – The Abertillery Round Barrow (GGAT06967g). The asset is located on the north-western edge of the 50m micro-siting of turbine 2. Although the asset has been re-interpreted to be a post-medieval quarry, given the location of further Bronze Age barrows in the study area to the north, there is a moderate potential for pre-historic remains in localised areas of the site.</p>
8.8.6	<p>The report also notes that there are historic hedges within the application site that date to at least 1841. Some of these boundaries would be partially removed for entrances to accommodate site tracks.</p>
8.8.7	<p>A Stage 1 Assessment has identified five scheduled monuments, nine listed buildings, one historic landscape and one World Heritage Site</p>



	<p>within the 1-5km of the site that are subject to potential effects. Details are given at Tables 7.8, 7.9 and 7.13 of the applicant's submission.</p>
8.8.8	<p>Of these receptors, nine fall within the Zone of Theoretical Visibility (ZTV), six on the periphery and one outside. The Sensitivity/Importance/ value of all receptors is determined as high. The magnitude of change has been determined as negligible for six receptors, with low or no change experienced by the remaining 10. The significance of the environmental effects is deemed to be none to minor for 15 of the receptors with St Illtyd's Castle Mound Scheduled Monument experiencing a moderate effect.</p>
8.8.9	<p>With regard to St Illtyd's Castel Mound it is noted that the turbines would be sited approximately 1.65km from the monument and would be fully visible. This would alter views to the north across the Ebbw Fach River but would not alter the wider views in other directions or the relationship of the monument to St Illtyd's Church.</p>
8.8.10	<p>On the basis of the report submitted the LPA anticipate that the proposal would have a neutral impact on the majority of cultural heritage and historic assets within a 5km of the site.</p>
8.8.11	<p>However, whilst the Abertillery Round Barrow (GGAT06967g) is subject to reassessment, has been damaged and is deemed to be of local significance, it is considered that the siting of Turbine 2 could have a negative impact on any subsurface remains. It is also considered that the alterations to the historic hedgerows could dilute and diminish the historic legibility of the landscape.</p>
8.8.12	<p>It is therefore anticipated that the proposal could have a negative impact on historical assets of local importance. However, relative to the wider historical environment this would be not significant in scale. Additional information with regards to means of recording and protecting the sub-surface archaeology and historic hedges, required prior to commencement of the proposal, should be secured by condition.</p>
<b>8.9</b>	<b>Socio-economics including tourism and recreation</b>
8.9.1	<p>The Blaenau Gwent Destination Management Plan 2016-2019 (Blaenau Gwent County Borough, 2016) sets out the approach to developing the visitor economy in Blaenau Gwent. This approach has been revised and updated in the Destination Management Plan 2020-</p>

	<p>25 (Blaenau Gwent County Borough, 2020)<sup>16</sup>. The Destination Management Plan recognises the value of cultural heritage to the visitor offer including the recognition of the area being the home of the National Health Service linked to Aneurin Bevan. Approximately 4km to the north east (within Torfaen County Borough) is the Blaenavon Industrial Landscape World Heritage Site which extends to approximately 33km<sup>2</sup>. The World Heritage Site was inscribed by UNESCO in 2000.</p>
8.9.2	<p>Although the latest local wide tourism data available as set out in the Welsh Government's Tourism Profile – Wales Local Authorities 2011-2019 (Welsh Government, 2021b) advises that BGCBC experiences a less than average income from domestic and international tourism, it is noted that the site is crossed by numerous public rights of way (PRoW), which include footpaths, bridleways and restricted byways that serve the local community.</p>
8.9.3	<p>Details submitted as part of the application confirm that some PRoW will be required to be temporarily closed during construction with safety signs erected during construction and future operation of the site. Active management must also be required during the construction period.</p>
8.9.4	<p>A distance of 200m from the turbines is required to reflect safety considerations for the users of bridleway PRoW. It is noted at figure 16.2 if the applicant's submission that PRoW 331/68/1; 331/71/1; 331/70/1; 331/108/1; 331/109/1 Bridleway cross the 200m radii for turbines to 2, 3, 4 and 5.</p>
8.9.5	<p>With regard to PRoW 334/41/1 Byway; PRoW 331/75/1 Footpath; PRoW 331/68/1; 331/71/1; 331/70/1; 331/108/1; 331/109/1 Bridleway; PRoW 334/41/1 Byway; PRoW 331/75/1 Footpath there is potential for conflict to arise between PRoW users and site traffic.</p>
8.9.6	<p>In response the applicant has proposed a number of options to manage the use of the PRoW during construction and operation. Following review, the Council's Public Rights of Way Officer has confirmed that the options presented reflect the ongoing discussions between the Authority and the applicant and that the diversion and/or extinguishment of public rights of way will need to be the subject of a separate application with regards the procedures specified as part of Section 257 of the Town and County Planning Act 1990 of Sections 118/ 119 of the Highways Act.</p>

8.9.7	<p>With regards to the options presented, the Officer notes any changes provided should be rational and evident to the public on the ground if they are to be followed in practice. There is a tension between proposing the stopping up of public rights along existing tracks whilst retaining those tracks on the ground for private use (or use on the basis of open access) if the justification for stopping up is safety. Further it is reasonably foreseeable that diverting intangible rights from clear linear tracks onto indistinct alignments through green space without accompanying surfaces or infrastructure setting out the new alignment is unlikely to be successful.</p>
8.9.8	<p>Preference is therefore given to option 2 over option 1. Though the truncation of bridleway rights south of turbine 5 within option 2 requires redress to ensure connectivity is retained for all classes of user, the viability of upgrading 31/113/1 and 31/113/2 to bridleway status along with associated connections should be explored to this end.</p>
8.9.9	<p>In conclusion it is noted that the proposal would have some impact on the existing PRowWs with diversion (or downgrading) with new permissive routes. As a result, it is anticipated that the effect of the proposal would be negative. However, subject to the embedded environmental measures and arrangements proposed being implemented, the overall effect with regard to the magnitude of change and the user experience could be neutral.</p>
8.10	<p><b>Renewable Energy</b></p>
8.10.1	<p>The Welsh Government's (WG) national legislative and policy background provides the context, specifically highlighting the positive approach to renewable energy generation within both Future Wales: The National Plan (2021) and Planning Policy Wales Ed 11 (2021).</p>
8.10.2	<p>Future Wales: The National Development Framework, outlines the Welsh Government's strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.</p>
8.10.3	<p>Policy 17 emphasis that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate</p>

	<p>emergency. In Pre-Assessed Areas for Wind Energy (as in this instance) there is a presumption in favour of large-scale wind energy development (including repowering) subject to the criteria specific requirements of policy 18.</p>
8.10.4	<p>Planning Policy Wales Edition 11, reaffirms the Welsh Governments targets for renewable energy generation and sustainable development with an emphasis that Local Development Plan policies be supportive of renewable and low carbon energy development in all parts of Wales (para 5.9.10).</p>
8.10.5	<p>Policy SP7 of the LDP seeks to address the causes of climate change through “encouraging more of the County Borough’s electricity and heat requirements to be generated by renewable and low/zero carbon technologies”. Further guidance is given in Policy DM4 of the LDP which encourages major development proposals to incorporate schemes which generate energy from renewable and low/zero carbon technologies of which onshore wind is cited as an example.</p>
8.10.6	<p>In 2020, it was estimated that the renewable energy figures stand at 56% (up from 51% in 2019). The Energy Report (Welsh Government, 2022) notes that the conditions are challenging for delivery of renewable energy. Furthermore, it notes that Blaenau Gwent has one of the lowest installed capacities for renewable energy (22MW of electrical installed capacity) with BEIS data for 2020 stating this stands at 34MW<sup>26</sup>.</p>
8.10.7	<p>It is noted that the proposed development is for a Wind Farm of up to 34MW which is equivalent to providing enough power to meet the annual electricity needs of approximately 21,100 homes. By way of comparison, the BGCBC area is estimated to have 31,371 households as of 2020 (Stats Wales, 2021c). Accordingly, having regard to Future Wales, it is considered that this proposal would have a positive effect on meeting identified targets for Renewable Energy.</p>
<b>8.11</b>	<b>Secondary Consent Requirements</b>
8.11.1	<p>The development will need to be the subject of secondary consent. These include the following-</p> <ol style="list-style-type: none"><li>1. Removal of the hedgerow – As a result of the age of the existing hedgerows and their reference within the Historic Environment Record, any proposed removal will need to be considered and</li></ol>

	<p>consented as part of a separate application submitted with regards to the Hedgerows Regulations 1997.</p> <ol style="list-style-type: none"><li>2. Works to alter or fell any trees covered by a Tree Preservation Order will need to be considered and consented as part of a separate application submitted with regards to the Town and County Planning Act 1990</li><li>3. The diversion and/ or extinguishment of any public rights of way as required by Section 257 of the Town and Country Planning Act 1990 or Section 118/ 119 of or Highways Act 1980.</li><li>4. As the works seek to provide an area of hardstanding in excess of 100sqm, the application will require sustainable drainage systems (SuDS) consent for surface water disposal as detailed by Flood and Water Management Act 2010 (the 2010 Act).</li><li>5. Temporary Traffic Regulation Order (TTRs) will be required for each section of the route where the police may need to stop or hold traffic to allow the AIL vehicles to pass. This may involve applying to multiple highway authorities for TTRs.</li></ol>
9.0	<b>SUMMARY</b>
9.1	<p>BGCBC has reviewed the submitted information relating to the current proposal and considers that provided appropriate controls are in place through the recommended conditions, that the impacts of the development as a whole would be negative, which will need to form part of an overall assessment of the planning balance having regard to identified benefits arising from the production of renewable energy at the site.</p>
9.2	<p>However, it should be reiterated that the application lacks sufficient information to allow full and reasoned assessment with regard to visual impact, biodiversity, land stability and minerals. In this respect additional information is required before the LPA can provide a review of how these works would impact these subject areas. These issues should be considered prior to determination of this application.</p>
10.0	<b>PLANNING CONDITIONS</b>
10.1	<p>At this stage, and notwithstanding the comments above in respect of the need for additional information, without prejudice to the determination of the application or the matters raised in this LIR, the following planning conditions are currently recommended (and may be subject to amendment at a later stage).</p>

- Construction method statement
- Construction traffic management plan
- Traffic management Plan
- Water management plan
- Habitat Management Plan to include invertebrate monitoring, programme of annual bracken reduction, methods to control grazing pressure
- Intrusive SI phase 2 geo-environmental ground investigation with emphasis on site and wider land stability
- Mechanism to reduce shadow flicker
- Decommissioning of turbines and and restoration detail of turbines
- Updated cemp to include dust suppressant, air quality management, water resource protection, pre-construction surveys of the highway network; details with regard to vehicle movements, wheel washing, hours of construction, site lighting, Biodiversity protection measures, mitigation and enhancement, timing and location of works relative to breeding and nesting birds, material management including storage and management of soil, Fuel oil and chemical storage , crossing of surface water flow, details of PROW closure and signage
- Archaeological recording to include excavation and archaeological watching brief
- Protection of existing known archaeological assets within the site.
- Hedgerow loss details plus mitigation and enhancement
- Details of the measures proposed to mitigation the effect of the development on St Illtyd's Mound
- Shadow flicker control module
- Design and detail position of the turbines and access track

	<ul style="list-style-type: none"><li>• Detail of specific travel routes for delivery vehicles</li><li>• HGV use of haulage routes</li><li>• Details of a curtailment regime for turbines 2, 5, 7 and 8 with regard to bat collision</li><li>• Post construction and operation bat monitoring</li><li>• Detailed drainage design</li></ul>
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