

Interim Consultation Report

Proposals for Mynydd-y-Glyn Wind Farm

Pennant Walters

Private and confidential 

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1. Introduction

Pennant Walters is developing proposals for Mynydd y Glyn Wind Farm in Rhondda Cynon Taf, on a site just to the north of Pre-Assessed Area (PAA) 9. These areas have been defined by Future Wales: The National Development Framework (adopted by the Welsh Government early 2021) as areas where there is a presumption in favour of large-scale wind energy development.

The site is located on an upland plateau with steep sloping sides, 3km to the west of Pontypridd. As currently defined, the site extends to approximately 200 hectares, which is predominantly grassland used for grazing. The nearest settlements are Porth, Trebanog, Tonyrefail and Trehafod.

The proposals include:

- up to seven wind turbines with a maximum blade height of 180m
- substation and transformer housing
- temporary construction compound
- temporary construction site offices
- crane pads and cabling
- access track construction
- construction/ improvements for an access to site

It is estimated that the wind farm will have an electrical power export capacity up to 42MW, which is equivalent to providing enough power to meet the annual electricity needs of approximately 32,000 homes.

The wind farm will be designed with an operational life of 30 years, exporting renewable energy directly to the National Grid.

Pennant Walters has an accepted grid offer from Western Power Distribution for a 33kV connection at Upper Boat. The connection is likely to comprise 1.5km of new line on wooden poles and a further 7.5km underground via ducting in the highway network.



As the proposed wind farm will generate more than 10MW it is defined as a Development of National Significance (DNS) and will be considered by an Inspector at Planning and Environment Decision Wales (PEDW) before being determined by Welsh Ministers.

Rhondda Cynon Taf County Borough Council (RCTCBC) and the local communities are key consultees and Pennant Walters is committed to undertaking proactive stakeholder and community engagement to ensure local understanding of the plans, enable input into the emerging proposals and help minimise potential impacts whilst maximising socio-economic opportunities.

A Consultation Plan was drafted at the beginning of the project that sets out: who will be consulted; how/when they will be consulted; the scope of consultation; how/when feedback will be provided; and contact details for the project. This draft Plan was discussed with local members and officers at RCTCBC in August/ September 2021. No comments/suggestions were received, and the draft Plan formed the basis of the early engagement carried out in October/ November 2021.

This interim Consultation Report provides an overview of the early engagement, feedback received and an initial response from the project team. Along with the completion of ongoing environmental studies and surveys, this engagement will help inform the final proposals, which will be the subject of a period of statutory consultation (for a minimum of 6 weeks) later in the year.



2. Consultation Approach

To better understand the issues and aspirations of the local community, the project team want to ensure that local stakeholders and people living in the vicinity of the site have an opportunity to view the emerging proposals, discuss them with members of the project team and provide comments as the project develops.

2.1 Engagement/Consultation Plan

An Engagement/Consultation Plan was drafted that set out: who will be consulted; how/when they will be consulted; the scope of consultation; how/when feedback will be provided; and contact details for the project. A Consultation Report will be submitted with the planning application, which will include details of how comments have been analysed and considered in the final proposals.

A draft of the Engagement/Consultation Plan was discussed with RCTCBC officers and local elected representatives at the start of the project, so their views could be taken into consideration before the Plan was finalised.

2.2 Welsh language

Pennant Walters is committed to promoting Welsh language and culture, and as far as is practical, Welsh will be treated as an equal language to English for community and stakeholder engagement relating to this project. All key consultation materials – including newsletters, exhibition boards and website - will be produced in English and Welsh. Welsh speakers from within the project team were also in attendance at the exhibitions.

2.3 Staged approach

Due to the nature of this project, a multi-stage approach to the consultation process is being undertaken:

Preparation

Early meetings with key elected representatives to introduce the project and discuss the draft Engagement/Consultation Plan, which set out the proposed consultation approach.



Stage 1 – Early engagement on the emerging proposals

Stakeholder and community engagement on the plans for the wind farm and key issues and opportunities associated with the proposals (20 October – 30 November 2021).

Stage 2 – Statutory DNS consultation on detailed proposals

Statutory consultation on the design scheme and draft planning application (for a minimum of 6 weeks) to include statutory notices in a local newspaper and around the site – dates to be confirmed.

2.4 Consultees

It is important to consult with people living and working in the vicinity of the proposed site and a core consultation zone was defined as those living and working in a radius of 1.75 miles from the centre of the site, that captures over 8,400 properties (8,199 residential and 220 business addresses) – see Appendix 1. A direct mailing was posted to all addresses in the consultation zone.

As well as local residents and businesses identified in the defined core engagement/ consultation zone, local stakeholders including local ward members, local community councils, MPs and MSs as well as local business groups, community and interest groups were also engaged. A list of identified community consultees can be found in Appendix 2.

The wider community was notified of the early engagement and encouraged to participate through adverts in the Pontypridd and Llantrisant Observer, posters and social media (see next chapter for more details).

Specialist consultees and relevant persons will also be consulted during the statutory pre-application consultation (see Appendix 3).

2.5 Feedback

The consultation has been designed to enable and encourage the local community and stakeholders to feedback on the wind farm proposals, to help shape the plans at an early stage. The engagement and consultation cover a variety of themes including site constraints and opportunities; the proposal; community benefits; ecology; landscape; heritage; and site infrastructure.

A range of feedback mechanisms have been available since the start of the project, including email address, telephone number and freepost address. A feedback form was also available to fill in online or at the exhibitions and return at the event or using the freepost address.



Feedback received throughout the development of the project will be reviewed and key issues responded to in this interim Consultation Report and the final Consultation Report, which will be submitted as part of the DNS application.



3. Early Engagement

Early engagement took place from 20 October to 30 November 2021 and a variety of consultation tools and communication channels were used to encourage participation from stakeholders and the local community.

3.1 Meetings

At the start of the project, a presentation was given to officers and local elected representatives at RCTCBC to introduce the project and discuss the draft Engagement/Consultation Plan with Pennant Walters and members of the project team.

Meetings/presentations were also offered to local stakeholders including Buffy Williams MS, Chris Bryant MP, Alex Davies-Jones MP, Tonyrefail Community Council and Pontypridd Town Council.

3.2 Website

A website was set up at the start of the project to provide information about the proposals and feedback mechanisms so local communities and stakeholders can find out more and comment on the emerging proposals: www.mynydd-y-glyn.co.uk

The website was visited by 288 unique users during the early engagement.





Pennant Walters is developing proposals for a wind farm on a site at Mynydd y Glyn, 3km west of Pontypridd.

Pennant Walters is developing proposals for a wind farm on a site at Mynydd y Glyn, 3km west of Pontypridd in Rhondda Cynon Taf.

Latest News

3.3 Newsletter

A newsletter introducing the emerging proposals for Mynydd y Glyn Wind Farm, the early engagement and feedback mechanisms was posted to residential and business addresses in the defined consultation zone and emailed/posted to identified stakeholders.

A copy of the newsletter can be found in Appendix 4.

3.4 Public exhibitions

With Covid-restrictions slightly less restrictive, it was decided public exhibitions could be held safely with pre-booking to manage the numbers attending to enable social distancing. At each exhibition, hand sanitiser was provided at entry/exit points, a one-way system was put in place and face masks were worn inside the venues.

Public exhibitions were held at Capel Community Resource Centre and Waun Wen Community Recreation Centre. A stakeholder preview was held in advance of the first public exhibition. A total of 51 people attended the exhibitions.



Time/Date	Location	Number of Attendees
2pm-8pm Thursday, 11 November	Capel Community Resource Centre	37
10am-2pm Saturday, 13 November	Waun Wen Community Recreation Centre	14

The exhibition included boards with the following information:

- Introduction to the exhibition and an introduction to Pennant Walters.
- Why we need wind farms and the planning process for the proposed Mynydd y Glyn Wind Farm.
- Information about the site and the constraints being considered.
- The emerging proposals and indicative project timeline.
- Information about the range of environmental studies and surveys being undertaken.
- Transport and access primarily during the construction phase as well as for ongoing maintenance.
- Community benefits.
- How to feedback comments on the emerging proposals.





3.5 Virtual exhibition

To enable those who could not, or did not want to, attend one of the public exhibitions to view the exhibition material, a virtual exhibition was hosted on the project website from 11 November 2021:

<https://www.icreate.co.uk/vr/pennant-walters/mynydd-y-glyn/language/Virtual-Public-Consultation.html>



To ensure accessibility to the information, people could choose to listen to the information on the boards (in English or Welsh) as part of the experience. A pdf of the boards was also available to download on the consultation page of the website for anyone wanting to zoom in and make text or images larger.

34 unique visitors logged into the virtual exhibition during the early engagement – 31 to the English version and 3 to the Welsh version.



3.6 Consultation Summary Document

A Consultation Summary Document that summarises the key issues and enables community members to engage easily in the process was produced and was available on the project website from the start of the early engagement.

Copies were also available to take away in hard copy from the exhibition and to send to people without internet access on request.

A copy of the Consultation Summary Document can be seen in Appendix 5.

3.7 Media

A press release was sent to local media to launch the project on 20 October 2021 (see Appendix 6).

Coverage included:

- 20 October: renews.biz – 42MW Welsh wind farm plans unveiled
<https://renews.biz/73039/42mw-welsh-wind-farm-plans-unveiled/>
- 21 October: Wales 247 - Have Your Say on Rhondda Wind Farm
<https://www.wales247.co.uk/have-your-say-on-rhondda-wind-farm-plans>
- 28 October 2021: Business News Wales – Have Your Say on Rhondda Wind Farm
<https://businessnewswales.com/have-your-say-on-rhondda-wind-farm-plans/>

3.8 Advertising

A number of tools were used to ensure the wider public, who didn't receive the newsletter, were informed about the emerging proposals and had an opportunity to participate



3.9 Facebook

A project Facebook page was established to create targeted local advertising to promote the early engagement and to advertise the public exhibitions:

<https://www.facebook.com/MynyddyGlynWindFarm>

The advert reached 4,250 people and had 335 post engagements.

Information about the proposals was also shared by local stakeholders and community representatives on local Facebook pages, including MS Buffy Williams and MS Joel James:



3.10 Newspaper advert

An advert was placed in the Pontypridd and Llantrisant Observer on 4 November 2021 – on page 7 - to advertise the public exhibitions (see Appendix 7).

3.11 Posters

An A4 poster was put up in the exhibition venues and locally, to advertise the exhibitions (see Appendix 8).



3.12 Community Benefit Workshop

To address how to best pursue the community benefits offer and address the issue of local ownership, we held a facilitated workshop of invited local stakeholders/community representatives via Zoom (on 27 September 2022) to explore the opportunities and deliverables. The results of this will be fed into the statutory consultation later in the year. A summary of discussions is included in **Appendix 9**.



4. Consultation Feedback

All comments received during the engagement and consultation will be analysed, collated, and presented to the project team at key milestones so feedback from local communities and stakeholders plays a continuous part in the evolving project plans.

This interim Consultation Report summarises the key issues raised in early discussions with local elected representatives and during the early engagement (20 October – 30 November 2021).

Once the statutory consultation has been completed (dates to be confirmed), all comments received will be reviewed and responded to through the Consultation Report, which will form part of the submission to Planning and Environment Decisions Wales (PEDW).

The Consultation Report will also detail the consultation process and explain how key issues have been addressed in the final proposals, where appropriate.

4.1 Feedback forms

During the early engagement, the local community was encouraged to provide thoughts and comments using the feedback form, which was available to complete online or in hard copy at the exhibitions. The feedback form was designed to be completed following a review of the exhibition boards/consultation summary document, which posed a number of questions related to the information presented.

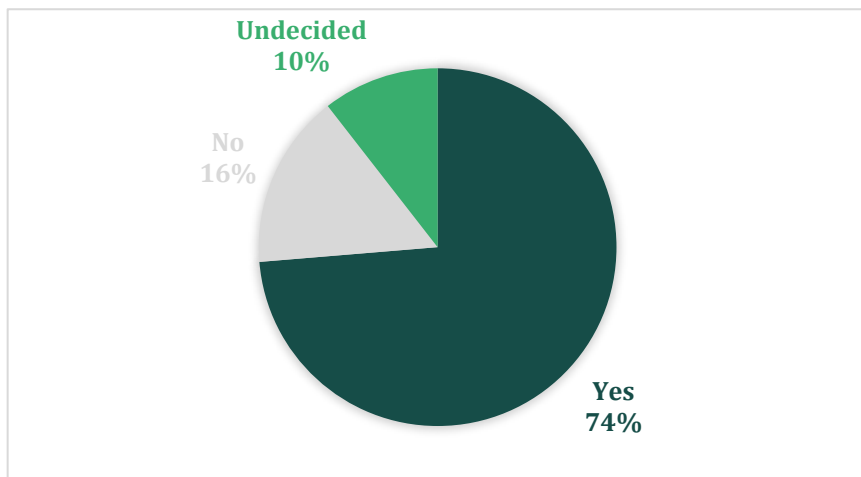
Respondents could complete all the questions, some of the questions, or just fill in the comments box at the end of the form. 19 forms were completed online or returned using the freepost address.

A summary of the key issues raised – and the number of people that raised those points – is provided in this section of the report.

Question 1: Do you support the principle of wind farms to generate renewable energy?



Of those who responded to the question, nearly three quarters (74%) support the principle of wind farms to generate renewable energy whereas 16% do not and 10% are undecided.



Question 2: Are there any other constraints that you think we should take into consideration as we develop the proposals for the Mynydd y Glyn Wind Farm?

Summary of comments	Mentions
Local impacts	
Visual impact - size of the turbines – concern over the height and impact on views and property values	6
Access for leisure – concerns over maintaining access to paths	3
Noise from the turbines	2
Shadow flicker	1
Proximity to houses – concern over safety and how children and young people could get close to the turbines	1
Environmental	
Cumulative effects – there are many wind farms here already which have destroyed the environment and wildlife	2
Effect on birds – Golden plover, Red Kites	2
The timing of the work should take nature into consideration e.g., nesting birds in the nature conservation area.	1



Construction	
Access to the area causing disruption to the local community	2
Consideration of disruption to wildlife and biodiversity while building the wind farm is important. Natural flora and fauna should be preserved, where possible	1
Other	
Hydro power would be better	1
Query how many local jobs will be created	1
Don't build it	1
A good idea. Paint them green and yellow like daffodils	1
Query whether there's an actual need for more wind farms in RCT	1
The historic environment of the Rhondda Heritage	1
Ground conditions – hydrology, drainage, domestic water supplies, the possibility of landslides	1
Your team needs to read the NRW response	1
The access road could spread the Japanese knotweed which currently grows along the route elsewhere	1
Rights of way will be impeded by the access route	1

Question 3: What are your initial thoughts on our emerging proposals for Mynydd y Glyn Wind Farm?

Summary of comments	Mentions
Emerging proposals	
Negative	5
Supportive	3
Wales already produces enough green energy	1
Local impacts	



Visual impact concerns over cumulative effects on the local landscape	4
Too close to highly populated areas	2
Concerns over access for leisure on a very popular landmark	1
Environmental	
Cumulative effects of wind farms in the area are spoiling the natural environment.	1
Diverse wildlife in the area	1
Construction	
Increased traffic and noise, the current infrastructure cannot cope, existing road safety issues will be exacerbated.	2
Concerns over the impact of the proposed access route on dwellings and accessing them during construction	1
Other	
It would be better to expand the wind farms already in the area	3
Supportive if there are community benefits which will help an area with diverse needs for investment	1
Location of wind farms in poorer areas taking advantage of little resistance from the community	1
Paint them like a daffodil or just green so that they are less imposing	1

Question 4: Are there any particular environmental impacts you think we should be aware of as we develop our proposals?

Summary of comments	Mentions
Impact on wildlife	
Effect on birds – buzzards, Skylarks, kites, plover, kestrels, snipe, owls, lapwings etc.	2
Effect on small animals and amphibians	2
Killing wildlife and destroying habitats	2



Effect on endangered butterfly	2
Expectation that the EIA will examine and address the impact on wildlife	1
There is an SSSI adjacent	1
Noise/vibration	
Expectation that the EIA will examine and address the impact on noise at the site and through the valley	1
Ground conditions	
Expectation that the EIA will examine and address the impact on water courses	1
Land stability – concerns over the wind farm increasing the risk of landslides which are already common in the area.	1
The serious effect on hydrology is a worrying concern	1
Visual impacts	
It will ruin the view	1
Construction traffic	
Access to site – its impact on the Penrhys Pilgrims Way	1
Access to site - will cut people's access to and from Trebanog and Tonyrefail. The pedestrian walkway will be blocked as there is no other access apart for a busy bypass road (A4233) with no pedestrian access.	1
The proposed site access road will cut across open farmland, footpaths and water catchments that flow into SSSI conservation land west of Mynydd y Glyn	1
Other	
Concerns over public rights of way on the mountain	2
Sustainability of construction – better to expand existing wind farms than build new infrastructure for this	1
Sustainability of construction – electric lorries to transport turbines to site and using locally sourced materials?	1
Concerns over bridle paths on the mountain	1
Too close to Rhiwgarn estate	1



It would make a positive contribution to ensuring more energy is sustainable, helping to minimise climate change	1
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Question 5: Are there any roads you would be concerned about us using to transport the turbine equipment? If so, please let us know your thinking.

Summary of comments	Mentions
<p>Construction traffic</p> <ul style="list-style-type: none"> • Trebanog Rd is already busy, adding to it would be a safety issue • Trebanog to Rhiwgarn is busy, steep and narrow due to parked cars • The roads that you would use seem quite unclear • The A4233 and surrounding area, the noise, air pollution and access to and from my home will be massively affected by this development • Narrow roads which are main travelling routes would be severely congested • All access roads from the M4 to site would be a concern for emergency vehicles • Trebanog Rd is a very busy main road and narrow in places • Avoid Trehafod as it's too small • Careful timing is needed to avoid disruption • Colenna Rd • Llantrisant Rd 	11

Question 6: What do you think about community benefit opportunities for Mynydd y Glyn Wind Farm, such as local ownership and the potential for a Community Interest Company to manage a Community Benefit Fund?

Summary of comments	Mentions
Supportive of the scheme if there are genuine community benefits, including if it were locally managed, available to all, and local ownership element	6
Community benefits do not compensate for the wind farm	6
Need to know more about community benefits	2



Indifference	1
Make our electricity bills cheaper	1
False promises paying funds to a handful of people	1
Effect of the wind farm on local businesses who have built their businesses on recreational use of the mountain	1
Wind farms being built in less affluent areas	1
The greatest benefit to the community and visitors would be for the developer not to build it	1
There is scant evidence of how existing grant arrangements from the wind energy industry would significantly benefit those communities in a truly beneficial fashion over time	1

Question 7: Additional comments

Summary of comments	Mentions
Energy	
Wind farms are not efficient if there's no wind	1
Environmental	
Renewable energy should not be at the expense of our wildlife, flora and fauna	1
Too close to people and communities	1
Rhiwgarn and Trebanog don't have much going for them so to take away the view of the mountain would be criminal, there are enough here already	1
Cumulative effects – this is one of the last mountains in the area without turbines. No more	1
There is a potential for the replacement of obsolete turbines on Mynydd Portref, west of Tonyrefail, utilising existing access and infrastructure. That seems to offer a more environmentally balanced option to consider in this case	1
Consultation	
The consultation should include a wider area e.g. as far as Llantrisant where we can see the mountain	1



Exhibition hosts should be better informed and show more empathy and compassion towards residents	1
Other	
Support	2
What about more industrial areas which would have less of an aesthetic impact?	1
Concerns over access route and future rights of way	1
Land adjacent to access route which is an SSSI	1
Nant Muchudd water course is a vital source for livestock	1
Rights of way adjacent to access route, concerns over 4x4's and fly tipping	1
Leave MYG alone and make it a nature reserve to offset the effects of your other wind farms	1

4.2 Emails and phone calls

In addition to the feedback form, respondents could get in touch with the project team and provide comments of the emerging proposals via the project email address or calling the dedicated project telephone number.

Summary of comments	Mentions
The technology	
Wind turbines will not be carbon neutral and will add to the global problem.	1
Renewables are the answer and I am strongly in favour	1
Location	
Build them where the energy is needed, not here where Wales already generates more electricity than it uses	1
Use mountains which have fewer settlements nearby	1
Noise impacts	



On birds/wildlife	1
On residents	1
Shadow flicker	
Concerns	1
Environmental	
Impact on wildlife	7
Visual impact	1
Construction vehicle disruption	1
Impact on biodiversity and wider forestry	1
Impact on health due to disrupted views	1
Impact on the money invested to promote conservation	1
Impact of turbine blades on birds and the risk of collision	1
Construction	
Effects on wildlife - the Red-kite population will become immediately threatened as soon as work begins. The Red-kite population do not stand a chance	1
Effects on area of nature conservation - the proposed access to the site is immediately through it. There is no way that you will be able to minimize disruption to this important site	1
Construction vehicles – HGVs to avoid smaller, narrow roads, e.g. through Penycoedcae and roads from Penycoedcae to Tonyrefail and Castellau	1
Visual impact	
An eyesore, cannot be hidden	2
Pre-existing wind turbines and pylons are already in my view and therefore this one will not have a detrimental effect. There are more pylons which are more of an eyesore. I like the look of wind farms and feel they offer me some hope for the future	1
Colour of the turbines – why not green or camouflage? Not white	1
Health	
Concerns about the effect on people's mental health	1



Concerns about the effect on people's physical health e.g. headaches, insomnia, tinnitus and depression	1
Access	
Impact of the project on ecology and landscape would mean a loss of amenity to the local community	1
Concerns over how legal issues of PROWs and Open Access Land will be settled	1
Ground conditions	
Concerns regarding peatbogs, mines, old spoil tips, sink holes	1
Concerns about natural springs which are the only water source for the community and farm animals and the potential effects of the wind farm which could run up high costs to rectify	1
Concerns about changes to drainage which may affect Nant Gelliwion and therefore the septic tank drainage system on the property, thus making the property uninhabitable	1
The principle of wind farms	
Object on the basis of the damage caused during construction and destroying natural beauty and heritage	1
Support – those who oppose the wind farm do not speak for all of the local residents	1
Strongly in favour	1
Other	
Loss of open access, green land will cause people to drive cars further afield for recreation, thus causing more greenhouse gases	1
Consultation newsletter not received	1
Impact on ATC radars	1
Impact on aircraft	1



4.3 Stakeholder responses

In addition to responses from members of the public, comments were also received from stakeholder groups and organisations. A summary of comments received from the organisations that responded to the early engagement can be found in the table below.

Organisation	Summary of comments
Cardiff Airport	They asked whether PW had considered the potential impacts upon Air Traffic Control radars and whether the development may present any issues which may have safety and/or operational implications upon the operations of aircraft to/from Cardiff Airport or operating under the control of Cardiff ATC. They also suggested engaging with Bristol Airport and Swanwick ATC for any potential impact on their radars.

4.4 Stakeholder meetings

A number of briefing meetings were held with local councils and elected representatives. A summary of comments received during discussions can be found in the table below.

Organisation/ MS / MP	Summary of comments
Rhondda Cynon Taf CBC members (first meeting with members)	<p>Issues raised which have already been captured in this report consist of land stability, water runoff, drainage, community benefits and highway access.</p> <p>Additional issues raised were as follows:</p> <ul style="list-style-type: none">● 180m – why so big? 7 very high turbines on a very high landscape is a real concern● Where has the figure of seven turbines come from?



	<ul style="list-style-type: none"> ● Entry off the bypass – turning right on a hill doesn't seem right ● Concerns over how to get massive turbine blades/parts to/up the mountain ● MYG is of huge historical and environmental significance – SSSI and Penrhys Pilgrimage walk ● Why is 1.5km of cabling not underground like the rest? ● Important that comments of councillors and local communities be taken into consideration ● Please keep us informed ● Many coal tips in RCT ● Stability of the foundations for the turbines? ● Covid has seen more and more people walk the mountain and appreciate the green space ● Is 7 the maximum or will it be extended over time? ● Query re land ownership ● Is there a role for the councillors and planning department, how influential will RCT CBC be? Do the rules of planning apply? Who has the final say? Is there a right of appeal?
<p>Rhondda Cynon Taf CBC (second meeting with Plaid Cymru members)</p>	<p>Issues raised were as follows:</p> <ul style="list-style-type: none"> ● Vibration affecting land stability ● Construction phase on mountains effecting flooding incidence ● Does the site have enough wind so that coal fired plants won't be used as a back-up? ● Will energy be cheaper?



	<ul style="list-style-type: none"> ● Partial overhead grid connection visual impact ● Peat bog loss ● Is it a greenfield or brownfield site? ● The impact of recent wind reduction ● How will you mitigate the effects of e.g., new nesting not included in your studies? ● where will your entry points be, which communities are likely to be most affected by the turbines being transported along their roads? ● Community consultation – to what extent would you characterise your plans to engage as above the statutory or the minimum that you must do to tick the boxes? ● Community Benefits for the nearest settlements – will you draw a boundary around where people can apply for benefits?
<p>Tonyrefail Community Council</p>	<p>Issues raised which have already been captured in this report focused on the ecology of the area.</p> <p>Additional issues raised were as follows:</p> <ul style="list-style-type: none"> ● In England wind turbines must be offshore – why not here? ● 7 turbines – the largest ever – 180m = a 60-storey building, two times the tallest in Wales – why so big? ● Size, speed, noise? Permanent whining? ● Access? Brenton Villa – at the top of the bypass coming in to Trebanog – cutting across SSI land, pathways, bridleways ● Overhead lines to Upper Boat for part of it – how do you propose to do it?



	<ul style="list-style-type: none"> ● Where we've got wind turbines in the area they've blocked off bridleways. I don't want access stopped to these sites. ● Also access to the trig point and the Pilgrim's Path must be maintained ● Maximum 180m is frightening. I would urge you to limit your height if possible ● Query access to the site – would it be maintained for maintenance purposes?
<p>Pontypridd Town Council</p>	<p>Issues raised which have already been captured in this report consist of visual impact, size, not in a Pre-Assessed Area, access, noise, the effect on birds and the possibility of them colliding with turbines.</p> <p>Additional issues raised were as follows:</p> <ul style="list-style-type: none"> ● access via our communities? (i.e. Pontypridd area) or all from Trebannog? ● the amount of energy you must use to build the turbines, it is quite high and so it can take some time to get that back. ● Concrete, turbines are not renewable (recyclable?), disposal of waste afterwards, transportation, the amount of concrete – manufacturing of it is one of the most carbon-used things ever invented, plus keeping carbon down during operation. Also, turbines must be shut down, baseload from fossil fuels as a back-up and therefore... the whole thing is based on a load of false premises
<p>Buffy Williams, MS for Rhondda</p>	<p>Issues raised were regarding how much consultation had been undertaken so far and whether we had contacted ward members to give them the option of a briefing meeting.</p>



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5. Pennant Walters

Response

As there is some repetition within the feedback forms and other feedback mechanisms, the key issues have been amalgamated and responded to in this section.

5.1 Local impacts

Location not suitable

The area adjacent to Mynydd y Glyn has been identified by the Welsh Government as a PAA in Future Wales: The National Plan 2040 (adopted February 2021).

<https://gov.wales/future-wales-national-plan-2040>. The PAAs are areas that have been identified, following high level assessment work, where there is a presumption in favour of large-scale wind energy development.

The Welsh Government's PAA for wind energy do not necessarily exclude other areas for wind farm development, nor do they mean that all areas within the pre-assessed areas are suitable places for a wind farm site.

PAA 9, relevant to the Mynydd y Glyn project, includes areas where onshore wind projects will be unfeasible and unviable (notably the valleys where there's a lack of wind resource and proximity to population is a factor). The intention of the PAAs are as a starting point and, therefore, any assessment of feasibility is undertaken in the context of Policy 17 and 18 of Future Wales, as informed by more detailed consideration of constraints, including constraints not considered for the PAAs.

Our analysis is that the boundary of the PAA does not consider local centres of population (Tonyrefail, Trebanog and farm steads) and potential proximity issues such as noise, visual and shadow flicker. Therefore, to avoid impacts, we concluded that the site would need to extend further north than the PAA boundary.

Mynydd y Glyn benefits from having good access to the highway network and to the electricity distribution network, with Western Power Distribution indicating that



after leaving site an underground connection to Upper Boat via the highway network is feasible.

Visual impact

Visual impact is a key consideration of any wind farm application, and studies are being carried out to examine the landscape and identify any potential visual impact/concerns to help inform a suitable layout/position for the turbines.

The project is at an early stage and the exact number (up to seven) and location of the wind turbines will be informed by a range of environmental studies as well as feedback from the early engagement. We will have visuals to illustrate what the wind farm will look like from a variety of different viewpoints during the statutory consultation.

Potential visual impacts from an indicative grid connection route between the site and wider national grid will be considered as part of the EIA.

Proximity to residential area

There is no guidance specifically concerning proximity to residential properties. An acceptable distance to residential properties is determined through an assessment of the effects which could occur from the construction and operation of a wind farm upon residents.

Key considerations include the potential for significant effects from noise, shadow flicker and upon visual amenity. Informed by existing baseline conditions, each of these topics will be considered and the results used to inform the siting of the wind turbines with the aim of preventing significant effects. An assessment and conclusions will be set out in the Environmental Statement (ES) submitted to support the planning application.

Impact on open access land/public rights of way

There is a limited public rights of way (PRoW) network within and close to the site, principally a PRoW linking Porth in the Rhondda Valley to Langton Court Farm, one of the closest properties to the south-east. A large proportion of the site on its western and eastern parts is within an extensive tract of Access Land that extends north across all the closest section of the southern side of the Rhondda Valley to the edge of the valley bottom settlements.

Re Penrhys Pilgrimage walk – the route of the walk does not enter the site itself but does cross the proposed site access from the highway network. Any potential



impacts on public rights of way and long-distance routes will be considered as part of the EIA and reported in the ES. Measures will be adopted to minimise any potential impacts of users of such routes.

Approximately one fifth of Wales is designated Access Land and as this land is commonly found on high ground it is not uncommon for wind farms to be placed within it. The presence of a wind farm does not affect the public's right to access the land and the existence of Access Land and PRoWs will be taken into consideration as the proposals are developed.

This consideration will include direct effects, such as the potential for footpaths to be crossed by construction traffic and indirect effects such as the views obtained by users of the footpaths crossing the site. In the unlikely event that formalised temporary closures of PRoWs are required this would be undertaken only in agreement with RCTCBC. The construction area would be fenced off but following commissioning the fences would be removed so access is unfettered.

Impact on mental and physical health of residents

Properly sited and with sufficient distance between the turbines and residents, wind turbines are capable of operating in a safe manner and should not affect mental or physical health.

5.2 Environmental

Impact on wildlife

Bird surveys have been carried out since early 2020 to identify the type and number of birds using the site. These surveys have looked at how the site is used by birds in both the winter and summer months and have also sought to identify flight paths across the site. In parallel, ecological surveys looking to confirm use of the site by species such as bats, otter, water vole, great crested newts, badgers, reptiles, marsh fritillary have also been undertaken and this information is presently being collated and reviewed to inform the siting of the wind turbines so that effects upon such species are minimised.

The survey results along with any mitigation and an assessment of effects will be presented within the ES in support of the planning application.



Pennant Walters is aware of a Norwegian study reported in 2020, which trialled a black turbine blade in order to reduce the number of sea eagles colliding with the turbines. However, further studies are probably required to see whether the reduction in collisions was specific to the type of bird involved or whether it would be an appropriate mitigation mechanism for a wider range of bird species.

Fundamentally, however, the aim should be to locate a wind farm in an area where the likelihood of collision is low. In the case of Mynydd y Glyn we will use the information collected from our bird surveys to undertake collision risk modelling. The results of this will be shared with the key consultees and will enable us to determine the probability of collision as well as the requirement for any additional mitigation.

Impact on adjacent SSSI

A very short section of the currently proposed access route is located adjacent to the Rhos Tonyrefail SSSI. Whilst the route is still to be finalised, measures will be put in place to ensure this designated site is not affected by any works associated with the proposed wind farm.

Impact on peat bogs

Peat surveys have been carried out on the site and identified small areas of peat localised towards the site centre. The layout of the wind farm will be designed to avoid these areas as far as is practicable. If such areas are unavoidable, it is difficult to reinstate them but many of them tend to dry out on the edges so we will commit to creating better vegetation, adding ditches, blocking them up, a whole range of initiatives we can undertake to maintain and improve this habitat; as we have done at Mynydd Bwlfa, where the enhancements have worked well.

Land stability

Ground conditions are assessed as part of the ES to inform the application.

A northwest-southeast fault crosses the centre of the proposed development site. The site's geology will be fully assessed as part of the assessment work being undertaken to inform the proposals and the application, a draft of which will be available as part of the statutory consultation process later in the year. A mining risk assessment will also be undertaken to consider potential land stability issues at the site and will inform the assessment within the ES.



Studies are being undertaken on land use and topography, hydrology, geology and soils, hydrogeology, flood risk (surface water, ground water and sewer) and conservation sites.

Pennant Walters and the Walters Group is experienced in developing wind farms in the central and western coalfield including the Maesgwyn windfarm on the former Maesgwyn opencast site above Glynneath.

Vibration effects during operation are often scoped out from consideration in EIA. The only potential vibration effects that would need to be considered in the ES would be from piling (if appropriate) during construction.

Geology

There are no Sites of Special Scientific Interest (SSSI) designated for their geology within the site, nor are there any Regionally Important Geological Sites (RIGS). The British Geological Survey (BGS) GeoIndex 1: 50,000 scale mapping of linear features indicates that there is one geological fault within the site boundary crossing northwest-southeast of the centre.

The geology of the site will be a consideration when identifying locations for the siting of the turbines. Site visits will be undertaken to provide further detail and understanding of the geological conditions and information will also be obtained from the Coal Authority.

Archaeology

There are no designated historic assets located within the site boundary, however there are thirteen listed buildings to the north of the site within the 1km study area. The northern area of the site lies within The Rhondda registered historic landscape. Within the site there are three records of non-designated historic assets located within the site boundary, including a long hut and two triangulation points. A site walkover survey will be undertaken to confirm the locations of the records mentioned above and to identify any other historic features.

The final siting of the turbines will seek to avoid direct damage to such features and subject to consultation with the Glamorgan-Gwent Archaeological Trust (GGAT) a programme of archaeological monitoring may be required when the wind turbines are being constructed.



Noise

The project team is undertaking a noise assessment to inform the location of the proposed wind turbines and to ensure that the noise generated falls within permitted parameters/ allowed limits.

As part of this assessment, noise measuring equipment will be placed at locations around the site to understand the base level of noise during different times of the day and night. These locations will be agreed with the Council's Environmental Health Officer. This equipment will enable Pennant Walters' noise consultants to understand the existing noise environment in the local area. The noise created by the wind farm will have to fall within permitted levels as set by relevant guidance.

Should permission be forthcoming for the wind farm, Welsh Government will set noise limits which the wind farm must adhere to. If local residents have concerns about the levels of noise generated once operational, monitoring will take place to ensure the turbines are operating within the agreed limits. Were these limits to be exceeded then measures would be taken to address this issue.

Pennant Walters has six operational wind farms in South Wales operating collectively for more than 30 years and has had very few noise complaints.

Shadow flicker

Shadow flicker is an effect caused occasionally when the shadow of rotating blades passes through a nearby narrow opening, such as a window. This can only happen relatively close to turbines and only at certain times of the day and year.

Recent research on the subject concludes that the shadows cast by one turbine on another should not be viewable by the public if the cumulative flash rate exceeds three per second and if the turbine blades are not reflective. You can read more here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/37048/1940-nps-renewable-energy-en3.pdf

As shadow flicker is an effect that can be accurately predicted, an assessment of any dwellings within proximity to the wind farm will be undertaken and reported in the ES. Should potential for significant effects be identified, it is possible to mitigate this by switching the turbine off at particular days and times. Normally this is early in the mornings and early in the evenings over a small number of days in the year.



5.3 Transport and access

The issue of transport and access will be given careful consideration as the project develops. We will identify what we believe to be the most appropriate route to the site for construction vehicles and we will seek to avoid narrow roads and roads fronted by residential properties as much as possible. Once initial routes are identified we will look to agree locations where traffic surveys could take place and these locations and the routes themselves will be first agreed with the relevant highway authorities.

The results of the surveys and an assessment of the effects arising from the transportation of the turbines and construction materials will be presented in the ES. This will include the consideration of abnormal loads such as the turbine blades and nacelles. If required, we can model the journey from the port to the site to identify any parts of the network where accommodation works could be necessary.

Pennant Walters will commit to a routing strategy which will seek to avoid sensitive locations such as mountain roads. It will be a requirement that all delivery drivers follow the routing strategy which will be the subject of agreement with the relevant highways' authority.

The access road within the site would be maintained over the life of the project.

Access from the highway network to the site would be controlled via a system of lockable gates and barriers to overcome any potential concerns raised relating to unnecessary access and fly tipping. Cattle grids would be installed to prevent livestock leaving the site. During construction security would be provided at the entrance point.

Rights of way will be preserved or if required diverted or alternatives provided for the operational period.

Access would be from the direction of the south from the M4, J34.

The access entry point will be clarified by drawings in the statutory consultation stage.

5.4 Technology

Wind turbines – their size, type and number

The height, number, and type of turbines to be used on site will be informed by the results of the environmental surveys and assessments. These will seek to establish the extent to which the wind farm could give rise to significant environmental



effects and how such effects could be mitigated. Mitigation may, for example, take the form of limiting the number of turbines, the length of the blade or the locations within which they could be sited. There are several available models in the bracket 160m-180m, and we will establish which is the most suitable for the specific conditions at this site.

Effectiveness

Onshore wind is a vital component of the UK's current generation mix having largely replaced coal generation over the last 10 years. Wind turbines typically start operating at wind speeds above 3 m/s and continue up to speeds of about 25 m/s (storm force winds). The base load of supply in the UK is provided by nuclear plant (which can't be turned off and on) supplemented by gas-fired plant. In the event of very low wind speeds, generation is augmented (and thus demand is met) by a plethora of smaller gas and oil-fired units along with imports from France and elsewhere.

Sustainability

As much as 90% of wind turbines are recyclable and Pennant Walters will commit to developing a decommissioning plan with RCTCBC and Welsh Government which will be the subject of a planning condition. The plan would not be developed until closer to the time of the decommissioning since recycling markets and opportunities are likely to be different then from now.

5.5 Construction

Noise

Construction noise will be assessed as part of the Environmental Impact Assessment (EIA) and appropriate mitigation proposed if/where appropriate. A Construction Environmental Management Plan will be prepared and submitted with the planning application. This will set out the hours of work, the routes to be taken to site and the construction methods to be used, for example.

Use of local labour

Pennant Walters will contract with Walters Group (who employ 500 people in South Wales principally) for the main civil engineering works and who in turn utilise Welsh suppliers to the maximum extent possible.



Construction phase on mountains affecting flooding incidences

To minimise increased flood risk from the development it will be ensured that run-off rates during construction do not exceed the 'greenfield' run-off rate in any watercourses. This will be achieved through the use of sustainable drainage systems and attenuation techniques such as filter drains, infiltration basins and buffer zones around watercourses as necessary.

Sustainability during construction

A carbon balance calculation will be completed using an appropriate, industry recognised tool. This will be reported in a Renewable Energy Policy and Carbon Balance section or appendix within the ES. The site has been identified as having areas of blanket bog and peaty soils. The carbon balance will consider the impact of the proposed development disturbing the peat resource since it has the potential to release carbon dioxide into the atmosphere.

The calculation will include consideration of greenhouse gas emissions in the production, transportation, erection, operation and decommissioning phases of the proposed development together with the loss of peat should it not be possible to avoid such areas.

Generally, wind farms pay back in 12 months. The amount of concrete is not that large, and you can recycle the turbines' steel towers. All energy production generates carbon in its construction. Once it's operational it doesn't burn more carbon.

5.6 Community benefits

All comments about how the Community Benefit Fund associated with the proposed wind farm could be administered are welcome and will be considered as the project develops.

With our existing community benefit funds, we have specified a boundary for applicants.

5.7 Consultation

Our early engagement was to understand people's initial feedback to the proposals. This allows the proposed development to be an iterative process with



many opportunities to comment and provide feedback. The consultation process is important and helpful giving us informed feedback from members of the communities and statutory consultees. We want to and we believe that we are doing well above the minimum requirement to ultimately assist us through this process. At our initial meeting with PEDW they were pleased that we had embraced the spirit with which the guidance is written.

Newsletter distribution

The newsletter was distributed to over 8,300 addresses in the 1.75 miles consultation zone and was also available on the project website. The consultation was also advertised in the local paper, on social media and via stakeholders in the wider area.

Comments of councillors and local communities to be taken into consideration

They have all been included in this report.

School engagement

Local schools were sent information about the emerging proposals and Pennant Walters would be happy to arrange to provide further information and create projects for/with interested schools/students.

5.8 Other

Property devaluation

There is no evidence that wind farms negatively affect property prices.

Impact on Air Traffic Control Radars

We are consulting with all the relevant aviation authorities.

Expansion of wind farms already in existence would be preferable

We have extended as far as practical all our existing windfarms.

Recycling wind farms



While we appreciate this being brought to our attention, the proposals under consideration are for Mynydd y Glyn. Replacing Mynydd Portref would be a consideration for the developer/owners of the site. Nevertheless, it would need to be the subject of a further application for determination by PEDW.

The effect on local businesses who rely on recreational use of the mountain

Other than some disruption during construction, the footprint of the wind farm is relatively small (less than 10 acres for the turbines and crane pads) and should not affect local businesses that rely on recreational use of the mountain.

Wind farms being built in less affluent areas

There are a number of criteria that need to be considered when finding a suitable location for a wind farm and the affluence of an area is not one of them. Key considerations are wind speed access and connection to the National Grid. Mynydd y Glyn is well located for both these.

Is there an actual need for more wind farms in RCT?

Welsh Government has set out the need for renewable energy in its response to the climate emergency - Future Wales: The National Development Framework, adopted by the Welsh Government early 2021. RCT has been identified as a county with areas appropriate for the generation of wind energy.

Issue of 1.5 km of grid connection being overground

The above ground section of the connection would be on ordinary wooden and relatively low impact visually.

Will the number of turbines be increased over time or is seven the very maximum?

Seven is the maximum number of wind turbines that are being considered as part of the Mynydd y Glyn Wind Farm proposals. This cannot change at this stage as this is the maximum number being assessed in the EIA.

Cheaper energy for consumers?

Energy generated from the proposed wind turbines will be fed back to the grid to be distributed to homes and businesses by Western Power Distribution. Pennant Walters does not play a role in determining the price of energy.



Is there a role for the councillors and planning department, how influential will RCT CBC be? Do the rules of planning apply? Who has the final say? Is there a right of appeal?

Although the planning application is a DNS and will ultimately be determined by Welsh Ministers, RCTCBC and the local communities are key consultees. As well as extensive pre-application engagement and consultation with local councillors, stakeholders and residents carried out by Pennant Walters, there will be a further opportunity for them to influence the decision during the examination process. This takes place after the DNS application is submitted and as part of PEDWs consideration of the proposals – all of which will help inform the recommendation to the Minister.

There is no right of appeal for a DNS decision, however, the Judicial Review process still applies.

Is the site greenfield or brownfield (due to coal mines being beneath it)?

Mynydd y Glyn is a greenfield site.

In England wind turbines must be offshore – why not here?

Planning policy in England is very restrictive regarding onshore wind. Within Wales, the Welsh Government remit is restricted to land. Offshore is a crown matter. Welsh Government's approach to increase its renewable energy target relates only to onshore generation.

7 turbines – the largest ever – 180m = a 60-storey building, two times the tallest in Wales – why so big?

180m is not the largest wind turbine available. For example, Y Bryn proposals in Neath Port Talbot CBC (being brought forward by Coriolis Energy and ESB) are 250m. 180m turbines represent the maximum height we believe would be appropriate for the Mynydd y Glyn site. This will be assessed through the EIA and the final size will be influenced by the results of those studies.



6. Conclusion / Next Steps

Feedback from the early engagement, along with ongoing discussions with stakeholders and the result of studies and surveys for the EIA will inform the development proposals – the number of turbines and their location.

The final proposals will form the basis of statutory consultation before a planning application is submitted to PEDW for Mynydd y Glyn Wind Farm later this year. Details of the timings for the statutory consultation and submission of the application will be made clear and available as we progress through the process.



