

Appendix 2B

Scoping Opinion

EIA Scoping Direction

DNS CAS-03678-M4Y0G7

Upper Ogmore Grid Connection

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 03 April 2025, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under Regulation 33 of the 2017 Regulations for a Scoping Direction in relation to a proposed development for a 66 kV electricity connection comprising underground cables and overhead lines between Upper Ogmore wind farm and the wider national grid, by National Grid Electricity Distribution.

The request was accompanied by a Scoping Report (SR) dated April 2025 that outlines the proposed scope of the Environmental Statement (ES) for the proposed development:

‘2025-04-03 - EIA Scoping Request - Scoping Report’, site location and site context plans, available via the Planning Casework Portal - <https://planningcasework.service.gov.wales/> and search **CAS-03678-M4Y0G7**

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

2. Scope of the Project

The applicant has submitted the SR which appears to treat the grid connection as a separate project for the purposes of EIA. The SR highlights the project would run from the consented Upper Ogmore Wind Farm to a connection point within the proposed Foel Trawsant Grid Connection, which is being progressed under a separate DNS application and by a different applicant (DNS CAS-02505-N3T6M4).

The SR states that the ES will consider in each chapter the in-combination effects between proposed development and the Upper Ogmore Wind Farm. The SR also states the ES will consider the cumulative environmental effects resulting from both the Upper Ogmore Wind Farm and the Foel Trawsant Grid Connection. PEDW is content with this approach and the Scoping Direction is drafted on that basis.

3. Site Description

The proposed development will comprise of both underground cables (UGC) and 66 kV overhead lines (OHL) which will provide a connection between Upper Ogmere Wind Farm and the wider national grid. The proposed development is mainly located within the administrative boundary of Bridgend County Borough Council and partially traverses through the administrative boundary of Neath Port Talbot County Borough Council.

Further information is available in section 1.1 of the SR.

4. Proposed Development

The proposal as described in the SR is for a grid connection route consisting of approximately 4.2 km of underground cabling and approximately 4.8 km of 66 kV overhead lines on wooden H-poles.

Further information is available in section 1.1 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

In the ES, any maps, drawing and illustrations that are proposed to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections.

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

5. History

The SR notes that the western-most OHL section predominately travels through a mix of gorse scrub, modified grassland and upland acidic grassland. The northern section of the UGC is predominantly through built environment, consisting mainly of residential properties. Once the cable transitions back to an OHL, it traverses through a mosaic of several habitat types.

6. Consultation

In line with Regulation 33(7) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Bridgend County Borough Council (BCBC)
- Neath Port Talbot Council (NPTC)
- Natural Resources Wales (NRW)
- Cadw
- Agricultural Land Use & Soil Policy, Welsh Government (LQAS)
- Dŵr Cymru
- Health and Safety Executive
- Coal Authority

- South Wales Fire and Rescue Service
- Mid And West Wales Fire and Rescue Service

Additional consultation was undertaken with:

- Rhondda Cynon Taf County Borough Council (RCTCBC) (neighbouring authority)

Responses received are included in **Appendix 1**.

7. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in Schedule 4 of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified Regulation 17 and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation, then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

7.1 Baseline

Schedule 4 of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

7.2 Reasonable Alternatives

In line with the requirements of Regulation 17 and Schedule 4 to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution. Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

7.3 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

7.4 Cumulative Effects

In accordance with Schedule 4, Paragraph 5(e) of the 2017 Regulations, the ES should include a description of the likely significant effects of the development on the environment resulting from “the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance to be likely affected or the use of natural resources”.

The Planning Inspectorate’s guidance for Nationally Significant Infrastructure Projects – Advice on Cumulative Effects Assessment sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

The Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in the Advice.

There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to renewable energy proposals.

Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Local Planning Authorities (LPAs), NRW, Cadw and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

7.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

7.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

7.7 Transboundary Effects

Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

7.8 Topics Scoped In but not subject to a standalone chapter

For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

8. Environmental Impact Assessment Aspects

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has / has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

8.1 Aspects Scoped In

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

- Climate Change (not necessarily as a standalone chapter)**
- Major Accidents and Disasters (not necessarily as a standalone chapter)**
- Landscape**
- Traffic and Transport**
- Ecology**
- Ornithology**
- Historic Environment**
- Hydrology, Geology and Hydrogeology**
- Coal Mining**
- Material Assets and Waste (not necessarily as a standalone chapter)**
- Population and Human Health (not necessarily as a standalone chapter)**
- Electromagnetic Fields**

9. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
General			
ID.1	1.1	Description of development	<p>The applicant's attention is drawn to section 2 above, where PEDW notes the SR treats the grid connection as a separate project for the purposes of EIA and notes the proposed approach to consideration of cumulative effects. The applicant's attention is therefore also drawn to the advice on cumulative effects below.</p> <p>The applicant's attention is further drawn to NRW's comments outlining expectations of what the description of development should include.</p>
ID.2	1.5.5 – 1.5.6	Cumulative effects	<p>Further to the statement in the SR as outlined above that the ES will consider in each chapter the cumulative effects resulting from both the Upper Ogmere Wind Farm and the Foel Trawsant Grid Connection, PEDW advises that cumulative effects are clearly addressed in each chapter in the ES.</p> <p>To ensure a comprehensive assessment in the final ES, the applicant is advised to liaise with the LPAs on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered.</p>
ID.3	1.3	Reasonable alternatives	<p>PEDW welcomes that the SR states that the ES will include consideration of the options considered prior to the final route being chosen. PEDW advises that the ES includes a robust rationale for the selection of overhead and underground cabling, with appropriate assessment of alternatives. The applicant's attention is drawn to section 7.2 above.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.4		Site access	PEDW notes it is not clear whether site access will include any vegetation clearance (including hedgerow or trees) or track widening. Should this be the case, the ecological assessment and appropriate studies should include the whole site and should be included within the ES where appropriate. The material to be used as well and the impact that these materials will have on the surrounding area (e.g. hydrology, geology) should also be considered.
ID.5	1.2.1	Climate Change	<p>PEDW agrees that Climate Change does not require a standalone chapter as related impacts will be considered in other chapters, as indicated in ES. This should include the impact of the project on climate and the vulnerability of the project to climate change. Climate Change is therefore scoped into the ES, but not as a standalone chapter.</p> <p>The applicant's attention is also drawn to the comments from South Wales Fire and Rescue Service in relation to climate change risk.</p>
ID.6		Approach to mitigation	PEDW notes the SR includes references to mitigation measures which can be embedded into the design of the proposed development. PEDW's position is that 'embedded mitigation' is better addressed under the 'Reasonable alternatives considered' in the ES.
Applicant's aspects proposed to be scoped out			
ID.7	9.2	Air Quality	<p>NPTC and BCBC concur this topic can be scoped out. NPTC adds that construction dust should be addressed through the Construction Environmental Management Plan (CEMP).</p> <p>PEDW notes that the SR states that following best practice construction methods, impacts from dust generation will be negligible. PEDW agrees these</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>should be set out in the CEMP, which should be included as a technical appendix to the ES. PEDW is therefore content for Air Quality to be scoped out.</p>
ID.8	9.3	Socio-Economics	<p>PEDW agrees that this topic can be scoped out.</p>
ID.9	9.4	Noise and Vibration	<p>NPTC and BCBC concur that noise can be scoped out. The applicant's attention is drawn to NPTC's comments regarding construction working hours. PEDW notes the SR states the noise and vibration will be assessed within the CEMP. This will determine the mitigation required as well as providing general good practice measures to be adopted. PEDW welcomes the SR states any mitigation measures will be agreed with the local authority Environmental Health Officers.</p> <p>PEDW is content for noise and vibration to be scoped out and recommends the CEMP is included a technical appendix to the ES.</p>
ID.10	9.5	Land Quality	<p>NPTC and BCBC are content for Land Quality to be scoped out. The applicant's attention is drawn to BCBC's response highlighting the site is located within a number of Category 1 and 2 Mineral Safeguarding Zones and the requirements that proposals would need to demonstrate.</p> <p>NPTC states they agree with the proposal to undertake a Phase 1 Geoenvironmental Desk Study and the production of an unexpected contamination plan. They add that given the low-risk end use, they do not consider this to be a significant effect. NPTC notes the statement at paragraph 9.5.4 of the SR regarding the iterative risk-based approach starting with Phase 1, followed by Phase 2 Ground Investigations where considered necessary, which may be conditioned.</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>PEDW notes the SR states that the findings of the Phase 1 study will inform the design of the grid connection route and there should therefore be no potential for significant effects on land contamination receptors. The SR also states that findings of the Phase 1 study will be used to develop the CEMP, which will include a protocol for responding to any unexpected contamination encountered during ground works.</p> <p>In relation to peat soils and peatland habitats, LQAS agrees with the assessment as set out in paragraphs 9.5.26 to 9.5.29 of the SR and agrees these matters can be scoped out. LQAS also agrees with the Section 9.5.30 to 9.5.31 of the SR regarding Agricultural Land Classification (ALC) and states that a detailed ALC field survey is not recommended on this site nor the application of Best and Most Versatile (BMV) agricultural land policy as outlined in Planning Policy Wales (PPW). LQAS is therefore content for BMV agricultural land to be scoped out.</p> <p>PEDW notes the SR states soil management measures will be set out in the CEMP to minimise damage to soils during construction. The SR also states that if peat is found that meets the criteria and cannot be avoided, the requirement for any further assessment such as a Peat Slide Risk Assessment, will be confirmed and a Peat Management Plan will be produced to support the CEMP. Should this be the case, PEDW recommends the applicant liaises directly with LQAS to ensure the impacts on peat are appropriately addressed.</p> <p>Given these considerations, PEDW is content for land quality to be provisionally scoped out. PEDW recommends the CEMP, and Peat Management Plan and Peat Slide Risk Assessment if produced, are included as technical appendices to the ES and peat be proportionately addressed in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.11	9.6	Major Accidents and Disasters	<p>PEDW notes that table 9-5 of the SR outlines which major accidents and disasters have been scoped in and that the relevant ES chapters identified will consider the matter in more detail. The SR states that this may show that no further assessment is needed, or that further assessment or mitigation is required.</p> <p>As such, Major Accidents and Disasters is scoped into the ES, but not necessarily as standalone chapter.</p> <p>The applicant's attention is drawn to comments from the Coal Authority regarding coal mining features which may pose potential risk to surface stability and public safety. This is further addressed under the Coal Mining section below. The applicant's attention is also drawn to advice from South Wales Fire and Rescue Service regarding risks from flooding and wildfires, as well as adequate water supplies and vehicle access for firefighting purposes.</p>
Landscape			
ID.12	2.2.5	Study Area	<p>PEDW notes that the SR states that the proposed study area will be reviewed and amended in response to the design and assessment process. Following refinement of the study area, receptors affected and any mitigation required should also be reviewed and clearly outlined in the ES. PEDW recommends this is completed in agreement with the local authorities and other relevant consultees, including Cadw.</p>
ID.13	2.3.15	Cumulative Assessment	<p>PEDW notes the SR states that the Cumulative Landscape and Visual Impact Assessment (CLVIA) will include the consented Upper Ogmere Wind Farm. PEDW advises that further to paragraph 1.1.5 of the SR, Foel Trawsnant Grid Connection is also included in the CLVIA.</p>

ID	Reference in Scoping Report	Issue	Comment
			To ensure a comprehensive assessment in the final ES, the applicant is advised to liaise with the LPAs on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered.
ID.14	2.4.12	Baseline Environment	BCBC highlights the location of the site within the Northern Uplands and Foel y Dyffryn Special Landscape Areas (SLAs). The applicant's attention is drawn to the LPA's comments on the protection of the settings of SLAs, with consideration of the views from those areas to settlements and for development within settlements to provide an attractive transition between the urban areas and the countryside.
ID.15	Table 2-2	Viewpoints	PEDW notes the SR provides a number of proposed viewpoints. These would need to be reviewed following refinement of the study area as outlined above. It is not clear from the SR whether viewpoints have been agreed with relevant consultees. PEDW recommends the applicant agrees required viewpoints, in relation to both construction and operational phases, with the LPAs and Cadw, ensuring this is clearly addressed in the ES.
ID.16	2.5.3	Photomontages	PEDW notes the SR states that it is not deemed necessary to include photomontages at the ES stage, due to the relatively small scale of the works, the extent of the wooden poles and the minimal receptors affected. PEDW recommends this approach is agreed with the LPAs and Cadw following agreement of the study area and viewpoints.
ID.17	2.5.4	Residential Visual Amenity Assessment (RVAA)	PEDW notes the SR includes potential significant landscape and visual effects on residential receptors at construction and operational phases. PEDW recommends the applicant liaises directly with both LPAs to discuss whether a RVAA is required, ensuring this is appropriately addressed in the ES.

ID	Reference in Scoping Report	Issue	Comment
Traffic and Transport			
ID.18	3.2.4	Study Area	PEDW notes the SR states that the construction traffic route is currently unknown. PEDW recommends the applicant liaises directly with both Highways Authorities once further detail is available, to ensure Traffic and Transport is adequately assessed and proportionately addressed in the ES.
ID.19	3.6	Traffic and Transport Assessment	<p>BCBC confirms it agrees with the traffic and transport assessment as proposed in section 3.6, which details the Construction Traffic Management Plan (CTMP) and the Public Rights of Way Management Plan.</p> <p>PEDW notes the SR states these documents will set out mitigation measures and as such PEDW recommends both documents are included as technical appendices to the ES.</p>
ID.20	3.5.8	Highways Crossings	PEDW notes the SR states the proposed route does not cross any adopted highways. The SR adds that should this change, the impact and required mitigation measures will be identified within the outline CTMP. PEDW recommends the applicant liaises directly with both Highways Authorities once further detail is available, to ensure this is adequately assessed and proportionately addressed in the ES.
ID.21	Table 3-5	Public Rights of Way (PRoW)	<p>NPTC notes the PRoW included in table 3-5, highlighting the development should not interfere with the current routes or obstruct users of the PRoW network. The applicant's attention is drawn to their comments advising that no alteration or change of condition to the PRoW is to be undertaken without further consultation with the Countryside Team.</p> <p>As a side note, the consenting strategy for any stopping up or diversion of existing PRoWs is a matter for the applicant. Please note that only permanent</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>stopping up or diversion orders can be included as Secondary Consents alongside the main DNS application. Should the applicant wish to pursue this option, please contact PEDW and the Orders Branch of the Transport Directorate of the Welsh Government (TransportOrdersBranch@gov.wales) to ensure that appropriate materials (including draft Order[s]) are included in the statutory DNS pre-application consultation and publicity phase. The applicant is encouraged to liaise with the LPAs and seek their own legal advice when considering their consenting strategy.</p>
Ecology			
ID.22	4.6	Assessment methodology	<p>NPTC is content with the approach outlined in the SR, subject to surveys and mitigation measures / activities being carried out and assessed as detailed in the SR.</p> <p>BCBC also confirms the approach to ecology is reasonable and welcomes the further surveys proposed. They highlight appropriate mitigation measures will need to be provided, which will allow the LPA to provide more informed comment on the impact of the development on habitats, species and the ecology and ecological resilience of the site and its surroundings.</p> <p>PEDW notes the SR states that further ecological assessment is anticipated to be needed. PEDW also welcomes the SR references further consultation with the LPAs on mitigation measures. PEDW recommends the applicant liaises directly with NPTC, BCBC and NRW on assessment requirements and outcomes, including any required mitigation measures, ensuring this is appropriately addressed in the ES.</p>
ID.23	4.4.14 / Annex 4.1	Habitat Surveys	<p>NRW notes the SR states that a UKHab assessment was carried out in April 2024. They highlight that in Wales they advise that Phase 1 habitat surveys</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>are undertaken, and where any existing classifications have been made they should be related to Phase 1 as far as possible. The applicant's attention is drawn to comments from NRW stating that habitat surveys should accord with the "Handbook for Phase 1 habitat survey – a technique for environmental audit (2010, JNCC Resource Hub): https://hub.jncc.gov.uk/assets/9578d07b-e018-4c66-9c1b-47110f14df2a</p> <p>NRW also advises that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.</p> <p>PEDW recommends the applicant liaises directly with NRW to agree habitat survey methodology and PEDW advises the outcome is clearly outlined in the ES.</p>
ID.24	4.2	Protected species - impact assessment	<p>The applicant's attention is drawn to comments from NRW regarding the assessment of impacts on protected species, including requirements for targeted species surveys.</p> <p>NRW highlights that, should protected species be found during the surveys, information must be provided identifying the species-specific impacts together with any mitigation and compensation measures proposed. Where this concerns protected species which are also notified features of designated sites, the impacts from both perspectives should be considered.</p>
ID.25	4.4.16 / Annex 4.2	Great Crested Newt (GCN)	<p>NRW welcomes the additional information provided in relation to GCN, highlighting there are no direct impacts to ponds or to any suitable terrestrial habitat. NRW confirms they therefore agree with the conclusions made in respect of GCN and have no further comment to make on this species.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.26	4.4.16 / Annex 4.1	Dormouse	<p>NRW notes the Preliminary Ecological Assessment (PEA) concludes that dormice will not be impacted by the proposal. They confirm they agree with the conclusions made in respect of dormice and have no further comments to make on this species.</p>
ID.27	4.5.15 / Annex 4.1 4.6.10	Otter	<p>The applicant's attention is drawn to comments from NRW regarding scoping out otter. NRW notes there will be no direct impact to riparian habitats and any indirect impacts will be short term. They further note the PEA states that it is possible that occasional dispersal of otters through the network of tributaries occurs on-site, but it is unlikely to support regular foraging or sheltering.</p> <p>NRW states that whilst they agree with the conclusions made in respect of otter, they advise that appropriate buffers are designed from the development to all water courses / riparian habitat on site, and where works are undertaken in the vicinity of water courses, that pre-construction surveys are included within the CEMP.</p> <p>PEDW recommends the CEMP is included as a technical appendix to the ES.</p>
ID.28	4.4.15 / 4.5.15 / 4.6.4 / Annex 4.3	Bats	<p>NRW notes and welcomes that all trees with potential to be affected by the development were inspected and welcomes that trees identified as having Potential Roost Features can either be avoided or that additional climbing / emergence inspections are being undertaken.</p> <p>NRW advises that all surveys are undertaken in accordance with the following guidelines and are submitted with the application; 'Bat Surveys for Professional Ecologists – Good Practice Guidelines' (4th edition), published by the Bat Conservation Trust, 2023.</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>PEDW notes that the SR states that bat activity surveys are scoped out. The applicant's attention is drawn to NRW's advising that in the event that trees will require removal within woodland, that bat activity surveys are undertaken.</p> <p>NRW also advises that survey results are used to determine minimum stand off buffers from sensitive habitats to bats. They add that where possible all features with suitability for bats should be retained and poles micro sited away from features and areas of sensitivity. NRW further advises that all trees to be impacted by the works are clearly marked on a submitted plan, including their potential for roosting bats.</p>
ID.29	4.4.15 / 4.6.1 Annex 4.4	Water vole	<p>The applicant's attention is drawn to comments from NRW on water vole. NRW welcomes that water vole survey is being undertaken and advises this is undertaken along the length of the overhead line route, including a walkover of all watercourses within the site to search for signs of the species.</p> <p>NRW advises the survey considers the water courses and surrounding suitable habitat extending beyond the immediate water environment, considering that water voles may exhibit a fossorial lifestyle.</p> <p>They further advise that survey results inform the route design and any proposed mitigation measures. NRW adds that poles should be located as far away from water vole habitat as possible. Where possible, habitat suitable for supporting water vole should be retained and protected and minimum development buffers utilised to protect water vole habitat.</p> <p>NRW advises that where water vole are recorded on site, and habitat cannot be adequately avoided, the principles of a Conservation Plan for the species is included within the application.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.30	4.4.6	Designated Statutory Sites	The applicant's attention is drawn to comments from RCTCBC highlighting there is important Site of Special Scientific Interest habitat on the RCT side of the county boundary with Bridgend, with key biodiversity issues including peat bogs and upland heath / acid / marshy grassland mosaics. RCTCBC also states the potential for golden plover wintering flocks, and birds of prey use of the landscape and bat movements (particularly seasonal movements).
ID.31	4.4.7 – 4.4.8	Sites of Importance for Nature Conservation (SINC)	<p>The applicant's attention is drawn to comments from both LPAs regarding SINC. BCBC highlights the site overlaps with a number of SINC and that development within a SINC should be compatible with the nature conservation or scientific interest of the area, whilst promoting their educational role. Attention is also drawn to comments from NRW on this matter, advising the applicant liaises with the relevant LPA and their ecologist to understand the impacts and mitigation requirements for these SINC sites.</p> <p>PEDW recommends the applicant liaises with both LPAs on this matter, ensuring the impacts on SINC are appropriately addressed in the ES.</p>
ID.32		Locally biodiversity interests	NRW recommends consultation with the BCBC and NPTC Ecologists on the scope to ensure regional and local biodiversity issues are adequately considered and that other relevant stakeholders are contacted for biological information relevant to the site and its surrounds.
ID.33	4.5.8 – 4.5.11	Cumulative effects	PEDW notes the SR states a cumulative assessment will be provided. PEDW recommends the applicant liaises with both LPAs on development proposals that should be included in the cumulative assessment, as they will be aware of developments in their area which will need to be considered. PEDW advises that further to paragraph 1.1.5 of the SR, Upper Ogmere Wind Farm and Foel Trawsnant Grid Connection should also be included in the cumulative assessment.

ID	Reference in Scoping Report	Issue	Comment
ID.34	4.6	Mitigation and Compensation	<p>The applicant’s attention is drawn to comments from NRW advising that the ES sets out how the long-term site security of any mitigation or compensation will be assured, advocating that where the potential for significant impacts on protected species is identified, a Conservation Plan is prepared for the relevant species and included as an annex to the ES.</p> <p>The applicant’s attention is also drawn to comments from RCTCBC highlighting that the development should deliver effective nature conservation mitigation and enhancement, with a particular reference to the priority habitat and species context of the area.</p> <p>PEDW notes that SR includes a commitment to a CEMP which would include measures to minimise effects on protected species and impacts resulting from (for example) disturbance. PEDW recommends the CEMP is included as a technical appendix to the ES.</p>
Ornithology			
ID.35	5.4.1 / 5.5.1 / 5.6	Assessment of impacts	<p>BCBC confirms they agree with the assessment, and the recommendations and mitigations as set out in section 5.6 of the SR.</p> <p>PEDW notes the SR states that further data searches and surveys are due to be completed, and that upon receipt, the assessment of impacts on ornithology will be refined. The SR also states further assessments are anticipated to be needed for statutory designated sites of national importance (Mynydd-Ty-Isaf SSSI and Eglwys Nunydd Reservoir SSSI) alongside a review of detailed / final project design.</p> <p>NPT welcomes the SR recommends consultation with the LPA is undertaken following further assessment, in relation to developing suitable mitigation</p>

ID	Reference in Scoping Report	Issue	Comment
			strategies for specific ornithological species where required. PEDW recommends BCBC and NRW are also consulted.
ID.36	5.4 / 5.6	Surveys	<p>NRW notes the proposed surveys and states these should be in line with industry best practice - Bird Survey Guidelines: https://birdsurveyguidelines.org/introduction/</p> <p>NRW highlights that surveys for barn owls should refer to Barn Owl Survey Methodology and Techniques for use in Ecological Assessment (CIEEM): https://cieem.net/resource/barn-owl-survey-methodology-and-techniques-for-use-in-ecological-assessment/</p> <p>NRW states that species-specific surveys should also be considered and should be informed by the habitat on site as well as the results of any desktop survey conducted to date. They add that surveys for birds during the non-breeding season may also be required, which will be informed by more robust desktop surveys.</p> <p>NRW advises that surveys during both the breeding and non-breeding season should take into account the need to determine impacts on protected sites with bird features within the zone of influence of the proposal.</p> <p>NRW advises the surveys are include within the ES. NRW also advises consideration is given to the likely significant effects on these species and that appropriate avoidance, minimisation, mitigation and / or compensation is proposed following the stepwise approach within PPW.</p>
ID.37	5.5.2 – 5.5.5	Cumulative effects	PEDW notes the SR states a cumulative assessment will be provided. PEDW recommends the applicant liaises with both LPAs on development proposals that should be included in the cumulative assessment, as they will be aware of

ID	Reference in Scoping Report	Issue	Comment
			developments in their area which will need to be considered. PEDW advises that further to paragraph 1.1.5 of the SR, Upper Ogmere Wind Farm and Foel Trawsnant Grid Connection should also be included in the cumulative assessment.
Historic Environment			
ID.38	6.2	Study area	<p>Cadw confirms that general they agree with the contents of the chapter, including the study areas, the likely significant historic environment effects and those assets that can be scoped out of further assessment.</p> <p>The applicant's attention is drawn to the historic assets listed in Cadw's response, the impact on which should be determined in accordance with the guidance in the document "The Setting of Historic Assets in Wales".</p>
ID.39	6.1.4 / 6.2 / 6.3 / 6.6.8	Assessment of effects	<p>BCBC confirms it is generally satisfied that the scheme will not be detrimental to the Historic Landscape in line with the proposed methodology.</p> <p>Heneb's response to NPTC notes the reference in the SR to the draft Archaeological Desk-Based Assessment. They highlight that not all identified sites were visited and some were either heavily obscured or inaccessible, as noted in the SR. Heneb notes the SR states a fully illustrated desk-based assessment will be submitted with the ES, expanding on the information currently provided and that a 2 km extended study area has been applied since for scoping historic assets. Heneb considers this approach appropriate.</p> <p>Cadw expresses concerns about the proposed further assessments required to determine the full impact of the proposed development. Without sight of the Historic Environment Desk-Based Assessment, they cannot determine the likelihood that previously unrecorded archaeological sites are located on the</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>cable route and if there is a need for additional surveys such as geophysical survey or archaeological evaluation to be carried out prior to the submission of the application. Cadw highlights the requirements of section 6.1.26 of PPW and adds that sufficient time should be included in the preparation of the ES to allow the required surveys to be completed before it is submitted.</p> <p>Both Heneb and NPTC recommend the desk-based assessment is carried out to the relevant Chartered Institute for Archaeologists Standards and Guidance and to a scope and methodology detailed in a Written Scheme of Investigation agreed with the LPA and Heneb. Both consultees highlight that the desk-based assessment is the first stage of the archaeological work and depending on the results, further mitigation may be required, either pre- or post-determination as appropriate.</p> <p>PEDW welcomes the SR states that where necessary engagement with Cadw and LPAs will be undertaken when refining the scope of the historic environment assessment for the ES. PEDW recommends the applicant liaises directly with both LPAs, Heneb and Cadw on the assessment requirements and any resulting mitigation requirements. Any departure from the advice provided should be supported by a robust rationale in the ES. PEDW also recommends the desk-bases assessment is included as a technical appendix to the ES.</p>
ID.40	6.5.4 / 6.6.9	Scheduled Monument	<p>PEDW notes the SR states there may be a requirement for Scheduled Monument Consent relating to proposed works at Clawdd Mawr Dyke, depending on the detailed design of the scheme, which would require consultation with Cadw.</p> <p>The applicant's attention is drawn to comments from Cadw, expressing significant concerns about the proposal to over sail scheduled monument GM231 Clawdd Mawr, Mynydd Caerau with the cables. Cadw states this</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>proposal is likely to have an impact that will constitute an unacceptably damaging effect upon the setting of scheduled monument, which would be contrary to section 6.1.24 of PPW.</p> <p>As a side note, the consenting strategy for Scheduled Monument Consent is a matter for the applicant. It can be included as Secondary Consent alongside the main DNS application. Should the applicant wish to pursue this option, please contact PEDW and Cadw (ScheduledMonuments@gov.wales) to ensure that appropriate materials are included in the statutory DNS pre-application consultation and publicity phase.</p> <p>The applicant is encouraged to liaise with Cadw and seek their own legal advice when considering their consenting strategy. Further information on Scheduled Monument Consent is available on the Cadw website: https://cadw.gov.wales/advice-support/historic-assets/scheduled-monuments/scheduled-monument-consent</p>
Hydrology, Geology and Hydrogeology			
ID.41	7.3 / 7.8 / 7.10	Assessment	<p>NPTC states that desk-based assessments should be completed as directed within the EIA scoping report and early discussions should be held with NRW and the Council's SuDS Approval Body. BCBC states they agree with the assessment, and the recommendations and mitigations as set out in chapter 7 of the SR.</p> <p>PEDW notes that the SR states that the chapter was prepared prior to the completion of data requests, consultation and field surveys and that as such the baseline conditions described may be subject to change. PEDW welcomes the SR states that consultation will be carried out with NRW, Dŵr Cymru, NPT and BCBC to inform the EIA and refine scoping decisions. Any departure from the</p>

ID	Reference in Scoping Report	Issue	Comment
			advice provided by consultees should be supported by a robust rationale in the ES.
ID.42	7.5.3	Water Framework Directive (WFD)	NRW notes that the Western part of the cable route crosses multiple small waterbodies close to the Afon Llynfi, increasing the possibility for impact caused by the works. Due to the risk of potential impact to the aquatic environment NRW recommends that a WFD assessment is undertaken. NRW states that any works should not lead to a deterioration in that waterbody or prevent that waterbody from meeting a good status / potential.
ID.43	9.5.4	Groundwater	NRW notes that the SR states it is intended to undertake a Phase 1 Geoenvironmental Desk Study, which will inform upon the need and scope of a Phase 2 Ground Investigation if / where merited. The applicant's attention is drawn to NRW's offer to review this once submitted.
ID.44	7.5.10	Flood risk	NRW notes the majority of the cable route lies outside an area at risk of flooding, however some sections may cross areas at risk of flooding. They therefore advise further consultation with the relevant lead local authority on surface water flooding. The applicant's attention is drawn to NRW's comments regarding possible permit and consent requirements. Further attention is drawn to South Wales Fire and Rescue Service comment on flood risk.
ID.45	1.1.30 / 7.7.3	Underground cabling	<p>NRW highlights that the nature and upkeep of the buried parts of the network is currently unknown / undefined, that is, whether buried cabling would be routinely replaced because of degradation / loss of efficacy. They note the SR states that decommissioning will not include removal of the underground cable, and assumed, underground joint bays.</p> <p>NRW advises that information is submitted in the ES on the long-term management of buried cabling and associated buried assets, notably on the</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>potential for degradation and the release of chemicals that comprise the cabling. NRW highlights the need for the provision of a Buried Cabling Risk Assessment (BCRA) if cabling will remain in the ground in perpetuity following decommissioning. The applicant's attention is drawn to comments from NRW on this matter, including on the contents of the BCRA.</p> <p>PEDW notes table 7-1 confirms direct and indirect effects on groundwater is scoped in at decommissioning stage and recommends NRW's concerns are appropriately addressed in the ES. The ES should be clear about the proposed approach and likely effects in relation to the decommissioning of underground cabling. PEDW advises the applicant liaises directly with NRW on the requirements for a BCRA and recommends the BCRA is included as a technical appendix to the ES.</p>
ID.46	7.7.1	CEMP	<p>NRW advises that due to the risk of harm to the aquatic environment an overarching CEMP is submitted alongside site specific CEMPs where river crossings are used and / or underground cabling is to be installed. NRW advises that as the risk of silt mobilisation and runoff is high, the CEMPs should include detailed information regarding robust mitigation measures to be deployed at each relevant location, to be controlled by condition. The applicant's attention is drawn to NRW's comments on what the CEMP should include.</p>
ID.47	7.6.1	Cumulative effects	<p>PEDW notes the SR states a precautionary approach has been adopted to identify potential construction and operational significant effects to be assessed, including cumulative effects. PEDW advises that in terms of cumulative effects, further to paragraph 1.1.5 of the SR, Upper Ogmere Wind Farm and Foel Trawsnant Grid Connection should also be considered.</p>

ID	Reference in Scoping Report	Issue	Comment
Coal Mining			
ID.48	8.6.1		<p>The applicant's attention is drawn to comments from the Mining Remediation Authority regarding coal mining features being present at surface and shallow depth, which may pose potential risk to surface stability and public safety. They recommend that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, in line with their policy: https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries</p> <p>The Authority concurs with the recommendation that a Coal Mining Risk Assessment (CMRA) should be prepared. As the CMRA will address mitigation measures, PEDW recommends it is included as a technical appendix to the ES.</p>
Other considerations			
ID.49		Material Assets and Waste	<p>PEDW notes the SR includes limited detail on potential impacts in relation to material assets and waste. It will be necessary to address this in a proportionate manner, especially given the concerns raised around cabling by NRW, in relevant chapters. Material Assets and Waste is therefore scoped into the ES, although not necessarily as a standalone chapter. The CEMP should also be included as a technical appendix to the ES.</p>
ID.50		Population and Human Health	<p>PEDW reminds the applicant that, as outlined in section 7.6 above, the ES should address any significant effects on population and human health in light of the EIA Regulations 2017. This could be addressed under separate topic chapters or within its own specific chapter. Population and Human Health is therefore scoped into the ES, but not necessarily as a standalone chapter.</p>
ID.51		Electromagnetic Fields (EMF)	<p>The SR does not consider potential impacts from EMF on for example human health, ecology, communication and utilities. This should be addressed and</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>further information is required on the applicant's proposed approach to this matter. EMF during operation is therefore scoped into the ES in a proportionate manner. If impacts from EMF are to be scoped out, the ES should provide a robust rationale for this.</p>
ID.52		Non-Technical Summary (NTS)	<p>The applicant's attention is drawn the IEMA guidance on Effective Non-Technical Summaries for Environmental Impact Assessment: https://www.iema.net/media/vksermak/2023_iema_advicenoteguide_nts.pdf</p> <p>The guidance indicates that large linear projects may impact too many receptors to report in one document and it may be appropriate to split the NTS into smaller documents covering smaller spatial extents.</p> <p>The applicant should consider whether the advice is relevant for the proposal and include a clear rationale for the approach taken in the ES.</p>

10. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

10.1 Changes to PPW

On 11 October 2023 the Welsh Government introduced changes to Chapter 6 of PPW relating to:

- Green Infrastructure,
- Net Benefit for Biodiversity and the Step-wise Approach,
- Protection for Sites of Special Scientific Interest, and
- Trees and Woodlands.

Details are available in the relevant 'Dear Chief Planning Officer' letter:

<https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

These changes have now been consolidated into a new edition of PPW (ed. 12), published on 07 February 2024: <https://www.gov.wales/planning-policy-wales>

10.2 Habitats Regulation Assessment

The Conservation of Habitats and Species Regulations 2017 require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the CJEU finding (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CN0323>) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – Advice on Habitats Regulations Assessments may prove useful when considering what information to

provide to allow the Welsh Ministers to undertake AA: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>

10.3 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

In accordance with paragraph 7.6 of Technical Advice Note (TAN) 15: development, flooding and coastal erosion, applications submitted after 31 March 2025 where planning permission is being sought before SAB approval should be accompanied by a Drainage Statement. Figure 3 of TAN 15 sets out the required contents of a Drainage Statement.

<https://www.gov.wales/technical-advice-note-tan-15-development-flooding-and-coastal-erosion>

Appendix 1: Consultation Responses



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	29th April 2025
Direct line Rhif ffôn	[REDACTED]
Email Ebost	[REDACTED]
Contact Cyswllt	Chantalle Lamnea
Your ref Eich cyf	P2025/0244
Our ref Ein cyf	P2025/0244

FAO Marlos Holtkamp
Planning & Environment Manager
Planning and Environment Decisions
(PEDW)
Wales
Welsh Government

BY EMAIL ONLY
PEDW.Infrastructure@gov.wales

Dear Sir,

Town and Country Planning Act 1990

Planning Ref.: P2025/0244
PROPOSAL: Consultation Request from Planning and Environment Decisions Wales (PEDW) on the content of a Scoping Direction under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 relating to a proposed application for a Development of National Significance (DNS) for the installation of 66 kV electricity network infrastructure comprising 4.8 km of overhead lines and 4.2 Km of underground cables to provide a connection between the upper Ogmores Wind Farm and wider National Grid (Foel Trawsant Grid Connection).
LOCATION: Land At Upper Ogmores Between Abergwynfi Blaengarw And Nant-y-Moel Bridgend And Neath Port Talbot

I refer to your correspondence received on 8 April 2025, which seeks advice on the scope of the EIA for the above development proposal. Consideration has been given to the information provided in the EIA Scoping Report and the questions raised therein, together with the relevant regulations and information that the Authority holds.

Local Context and Constraints

NRW Flood Zone Rivers - Risk Zone: Flood Zone 3

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG

Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

Tel 01639 686868

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

NRW Flood Zone Surface Water and Small Watercourses – Risk Zone: Flood Zone 2 and 3

Public Rights of Way (PRoW):

Route: 23/10/2
Route: 23/64/1
Route: 23/69/1
Route: 23/65/1
Route: 23/70/1

Contaminated Land: known areas of potentially contaminated land as per the Section 57 of the Environment Act 1995; Part 2A of the Environmental Protection Act 1990.

SINC Watercourse: Sites of Importance for Nature Conservation (SINCs). These are designated by the Local Planning Authority through the [Local Development Plan](#). All sites identified to date are available from the [South East Wales Biodiversity Records Centre \(SEWBRc\)](#). All qualifying habitats and species will be considered the same way as those already identified, in line with the [Wales Biodiversity Partnership Wildlife Sites Guidance Wales](#), with any local amendments detailed in the Biodiversity Supplementary Planning Guidance (2017). The list of sites that is held by SEWBRc will be updated as additional qualifying sites are identified, whilst those that no longer meet the criteria will be removed.

Coal Authority: Development High Risk Area.

Scheduled Ancient Monuments

Name: Clawdd Mawr, Mynydd Caerau
AM Ref: GM231

GGAT Sites

Site: Mynydd Cae
Summary: Tramway as noted on OS 6 inch 2nd edition 1900 map

Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Our advice is set out below in response to the respective chapters and the question raised by the applicant, with reference to Schedule 4 of the EIA Regulations 2017:

Chapter 1 – Introduction

No observations to make.

Chapter 2 – Landscape and Visual Impacts

No observations to make

Chapter 3 – Traffic and Transport

There are no observations from the Councils HDC (Highways) division; Head of Transportation and Engineering. Further discussions should be opened with this department prior to development: SAB-HDC@NPT.GOV.UK.

As identified within the supporting information (table 3-5, pg. 46) there are 3 No. PRoWs which are crossed by the aspects of the development, notably overhead lines (OHL) and in one case (FPT/PRoW 23/70/1) via an underground cabling, which should not interfere with the current routes or obstruct users of the PRoW network.

All Public Rights of Way shall be protected at all times and any damage caused to the Right of Way shall be rectified to the satisfaction of this authority. No alteration or change of condition to the PROW is to be undertaken without further consultation with the Countryside Team.

Chapter 4 – Ecology

No observations to make, subject to the surveys as outlined within section 4.2 (4.2.1) of the EIA scoping report and recommended mitigation measures/activities being carried out as detailed within section 4.6 of the report.

Chapter 5 – Ornithology

The surveys specified in section 5.6 of the EIA scoping report shall be completed and as highlighted, “further assessments are anticipated to be needed for statutory designated sites of national importance (Mynydd-Ty-Isaf SSSI and Eglwys Nunydd Reservoir SSSI) (to be considered within the ES) alongside a review of detailed/ final Project design”. The LPA would welcome addition consultations as discussed within para 5.6.10 of the report.

Chapter 6 – Historic Environment

There is one designated historic asset within the scoping boundary and There are 11 GGAT HER records. This is the scheduled Clawdd Mawr Dyke (GM231) as mentioned in the ‘constraints’ section of this response. Therefore, the proposal is located in an area of archaeological potential, with the report highlighting additional sites of interest at 300m and 2km extended study areas (inc. 28 GGAT HER records). Para 6.4.10 of the report identifies 6 No. RCAHMW records within the scoping boundary and a further 72 RCAHMW records within the 300m study area.

As outlined within section 6.6 of the EIA scoping report, further assessments are required. Such an approach is appropriate, and we recommend it be composed of a full desk-based assessment carried out to the relevant Chartered Institute for Archaeologists Standards and Guidance and to a scope and methodology detailed in a Written Scheme of Investigation (WSI) agreed with ourselves. This is in accordance with both Planning Policy Wales (PPW), ed. 12 (February 2024), Paragraph 6.1.26 and Technical Advice Note 24 Paragraphs 4.7-4.8. It should also be noted that the desk-based assessment is the first stage of the archaeological work and depending on the results it is possible that further mitigation may be required, either pre or post-determination as appropriate.

Chapter 7 – Hydrology, Geology and Hydrogeology

Desk-based assessments should be completed as directed within the EIA scoping report. Early discussions should be undertaken with Natural Resources Wales (NRW): [Natural Resources](#)

[Wales / Advice for developers](#) and the councils SuDS Approval Body SAB division: SAB-HDC@NPT.GOV.UK.

Chapter 8 – Coal Mining

Observations have been provided by The Coal Authority dated 23/04/2025:

Records indicate that within the area identified for the project there are recorded coal mining features present at surface and shallow depth including; mine entries and coal workings. These features pose a potential risk to surface stability and public safety. The submission is supported by a Scoping Report, dated April 2025 and prepared by WSP. Chapter 8 of this report considers coal mining, acknowledging the coal mining features recorded and potential risks these pose and at section 8.6 sets out recommendations in this regard. The report authors recommend that a CMRA is undertaken to assess the coal mining features, the risks they pose and to inform recommendations for further works to mitigate any risks found.

The report highlights that where mine entries and their zones of influence are present the buried cable and overline line supports should avoid these areas where possible and that if these areas cannot be avoided investigations to locate the mine entries and treat them along with other mitigation measures will be required. The Coal Authority concurs with the recommendations within the Scoping Report that a Coal Mining Risk Assessment (CMRA) should be submitted to support the project and that where possible siting supports and cables over mine entries or within their zones of influence of mine entries should be avoided.

Chapter 9 – Environmental Aspects Scoped Out

Air Quality: as highlighted within the report, the project does not fall within an Air Quality Management Area (AQMA), with the nearest AQMA at Margam, designated for particulate matter (8km to southwest). There are no nearby monitoring points undertaken by NPTCBC. We agree that this can be scoped out, with construction dust being addressed through a Construction Environmental Management Plan, CEMP.

Noise: We agree this can be scoped out and construction noise shall be addressed via the preparation and submission of a CEMP. Construction noise and vibration impacts will be assessed within a Construction Environmental Management Plan (CEMP) in accordance with BS 5228:2009 +A1:2014 Code of practice for noise and vibration control on construction and open sites. Generally, we require construction work to take place between 08:00 and 18:00, if the extended hours are essential for safety or other significant reasons this should be clearly justified within the CEMP.

Land Quality: We agree with the proposal to undertake a Phase 1 Geoenvironmental Desk Study and the production of an unexpected contamination plan. But given the low risk end use, we do not consider this to be a significant effect.

As directed within the EIA scoping report, “LCRM comprises an iterative risk-based approach starting with a Phase 1 Geoenvironmental Desk Study (also known as a Preliminary Risk Assessment) and followed by a Phase 2 Ground Investigation (including quantitative risk assessment) where considered necessary, to assess the risks to the environment and users of the land posed by contamination that may be present.” The LPA may also impose standard planning conditions to deal with these matters pre- and post- commencement.

There are no further comments to make in respect of this consultation.

Yours faithfully,



Chantalle E Lamnea

NPTCBC Senior Planning Officer
Development Management
Environment and Regeneration



Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Our ref: NPT0967/HB

ARCHAEOLOGICAL PLANNING

Head of Planning
Neath Port Talbot County Borough Council
The Quays
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

29th April 2025

FAO: Chantalle Lamnea

Dear Sir/Madam,

Re: Consultation Request from Planning and Environment Decisions Wales (PEDW) on the content of a Scoping Direction under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 relating to a proposed application for a Development of National Significance (DNS) for the installation of 66 kV electricity network infrastructure comprising 4.8 km of overhead lines and 4.2 Km of underground cables to provide a connection between the upper Ogmere Wind Farm and wider National Grid (Foel Trawsant Grid Connection). Land At Upper Ogmere, Between Abergwynfi Blaengarw and Nant-y-Moel, Bridgend and Neath Port Talbot
Pl.App.No.: P2025/0244

Thank you for consulting us on this scoping opinion. We note the submission of a Scoping Report for the above Project by WSP (Project No: UK0028130.1329, Report No: UK0028130_UpperOgmere_0014, dated 03/04/2025).

We have consulted the information contained in the Historic Environment Record (HER) and note that the proposal is located in an area of archaeological potential with a range of periods and site types, and with Scheduled Monuments also present within the area. We note the intention within the submitted Scoping Report **to consult Cadw** when refining the scope of the historic environment assessment for the ES, and in regards to any requirements for scheduled monument consent (Section 6.6.8 and 6.6.9).

The Historic Environment Section of WSP's Scoping Report, details that it has been informed by a draft Archaeological Desk-based Assessment (ADBA). However, not all identified sites were visited and some were either heavily obscured or unaccessible (Section 6.1.4). As such, it is proposed that *"A fully illustrated desk-based assessment will be submitted with the ES, which will expand on the information currently provided."*, and it is also noted that a 2km extended study area has since been applied (Section 6.2.1 and 6.2.2). Such an approach is considered to be appropriate and we recommend that the desk-based assessment is undertaken to the relevant Chartered Institute for Archaeologists Standards and Guidance and to a scope and methodology detailed in a Written Scheme of Investigation

Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

The Trust is both a Limited Company (1198990) and a Registered Charity (504616)

Cyfeiriad cofrestredig: Tŷ Cornel, 6 Stryd Caerfyrddin, Llandeilo, Sir Gaerfyrddin SA19 6AE

Registered address: Corner House, 6 Carmarthen Street, Llandeilo, Carmarthenshire, SA19 6AE

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Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

(WSI) agreed with ourselves. This is in accordance with both Planning Policy Wales, 12th Edition February 2024, Paragraph 6.1.26 and Technical Advice Note 24 Paragraphs 4.7-4.8.

It should also be noted that the desk-based assessment is the first stage of the archaeological work, and depending on the results it is possible that further mitigation may be required, either pre or post-determination as appropriate.

Thank you for consulting us on this scoping opinion. If you or the applicants have any questions or require further advice please do not hesitate to contact us.

Yours faithfully,



Hannah Bowden BA (Hons) MSc MCifA
Stewardship Officer

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Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

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Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr Bridgend County Borough Council

Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont, CF31 4WB / Civic Offices, Angel Street, Bridgend, CF31 4WB



PEDW Infrastructure,
Crown Buildings,
Cathays Park,
Cardiff, Cardiff,
fao Marloes Holtkamp
PEDW.Infrastructure@gov.wales

Grwp Datblygu / Development Group (Planning)

Deialu uniongyrchol / Direct Line: [REDACTED]
Gofynnwch am / Ask for: Steven Jenkins

Ein cyf / Our ref: P/25/218/DNS
Eich cyf / Your ref:

Dyddiad / Date: 13/05/25

Dear Marloes

Town and Country Planning Act 1990

The Developments of National Significance (Procedure) (Wales) Order 2016 (As Amended)

Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 - Regulation 33(7)

Project Name: DNS CAS-03678-M4Y0G7 - Upper Ogmere Wind Farm and the wider national grid

I apologise for the delay in responding to the request. I refer to your request for advice on the scope of the EIA and the proposed methodologies outlined in the Scoping Report, in relation to the authority's functions in order to inform your Scoping Direction.

The purpose of the scoping report is to define the environmental effects which will need to be assessed as part of the EIA, to establish the availability of baseline data, to define a survey and assessment framework for the EIA and to allow the relevant parties to comment on the proposed methodology for each topic to be considered and provide any relevant environmental information relating to the project and the surrounding area.

The submitted Scoping Report has been reviewed.

RELEVANT HISTORY

P/20/893/DNS: Development of National Significance Application (Planning Inspectorate ref DNS/3213662) for 7no. wind turbines - 4 have a max. tip height of 149.9m and 3 have a max. tip height of 130m, total capacity of 25.2MW; improved site access; new access tracks; hardstanding's; control building with associated equipment and assoc. tree felling

P/23/473/RLX: Vary condition 2 of PEDW Ref DNS/3213662 (P/20/893/DNS) to increase the rotor diameter of the proposed wind turbines from 105m to 117m - the overall tip height of the wind turbines will remain as consented

P/24/336/DOC: Approval of details for discharge of conditions 14 (Road Markings), 15 (Junction Warning Signs), 16 (Traffic Speed Reduction), 17 (Site Entrance) & 18 (Construction Transport Management Plan) of DNS/3213662 and P/23/473/RLX

PUBLICITY

No publicity is undertaken in connection with requests for a 'Scoping Opinion'. Internal consultations have however been undertaken.

APPRAISAL AND CONCLUSION

The submitted scoping report provides a general overview of the project and its location but it is noted that the scheme is likely to evolve through the EIA process

The majority of the proposal is located outside of any settlement boundary as defined by Policy SF1 Settlement Hierarchy and Urban Management of the Replacement Local Development Plan (RLDP) adopted in 2024 and, therefore, located in the countryside where Policy DNP1 Development in the Countryside of the RLDP sets a presumption against development in the countryside, except where it is for:

1. Agriculture and/or forestry purposes.
2. The winning and working of minerals.
3. Appropriate rural enterprises where a countryside location is necessary for the development.
4. The implementation of an appropriate rural enterprise/farm diversification project.
5. The expansion of an existing business (subject to other relevant policies in the plan);
6. Land reclamation purposes.
7. Transportation and/or **utilities infrastructure to enable implementation of LDP allocations.**
8. Renewable energy projects.
9. Affordable housing to meet locally identified need in accordance with COM5.
10. The suitable conversion of, and limited extension to, existing structurally sound rural buildings where the development is modest in scale and clearly subordinate to the original structure.

11. The direct replacement of an existing dwelling.
12. Outdoor recreational and sporting activities.
13. The provision of Gypsy, Traveller and Showperson sites in accordance with COM8; or
14. Education provision where a need has been identified by the Local Education Authority.

Countryside development must be of a sustainable form with prudent management of natural resources and respect for the cultural heritage of the area.

Where development is acceptable in principle in the countryside it must, in the first instance and where possible, utilise existing buildings and previously developed land. Where such an opportunity to re-use a rural building does exist, development must be in accord with DNP2.

Policy DNP1 of the RLDP seeks to protect the integrity and openness of the countryside and prevent inappropriate forms of development. The proposed development comprises of both underground cables and 66kV overhead lines which will provide a connection between Upper Ogmere wind farm and the wider national grid. **Criterion 7 identifies utilities infrastructure as an appropriate exception.**

The proposal is also located within a Local Search Area (LCA 1: Llangynwyd Rolling Uplands & Forestry Local Search Area (Suitable for Wind Energy)) as defined by Policy SP13: Renewable and Low Carbon Energy Development (2) of the RLDP. This policy states that proposals for development other than for wind energy within these areas will only be permitted where they can demonstrate that they would not unacceptably prejudice the renewable energy generation potential of the LSA and the Future Wales Pre-assessed Areas for Wind Energy.

Policy SP3 Good Design and Sustainable Placemaking of the RLDP states that all development must contribute to creating high quality, attractive, sustainable places that support active and healthy lives and enhance the community in which they are located, whilst having regard to the natural, historic and built environment, by:

- 1) Demonstrating alignment with the principles of Good Design; and
- 2) Demonstrating a Sustainable Placemaking approach to their siting, design, construction and operation.

Bridgend County Borough Council requests that the following observations in respect of the key topic areas be considered in PEDW's review of the Scoping Report: -

The submitted scoping report includes details of what the developers consider should be included within an Environment Statement (ES) and this includes:

- Landscape;
- Traffic and Transport;
- Ecology;

- Ornithology.
- Historic Environment.
- Hydrology, Geology and Hydrogeology.
- Coal Mining; and
- Environmental Aspects Scoped Out

The responses to consultations from the statutory consultees have highlighted the topics, which should be included within an ES, and in general, they follow the topics suggested in the developer's report.

However, the statutory consultee's responses have been included in full under each topic heading.

Landscape

The site is located within the Special Landscape Area (SLAs) of Foel y Dyffryn and Northern Uplands as defined by Policy DNP4(3) of the RLDP. Development in SLAs will only be permitted where:

1. It retains or enhances the character and distinctiveness of the SLA;
2. The design of the development reflects the building traditions of the locality in its form, materials and details, and/or assimilates itself in the wider landscape; and
3. The proposed development is accompanied by a Landscape Impact Assessment (LIA), which takes into account the impact of the development and sets out proposals to mitigate any adverse effects.

The settings of SLAs will be protected with consideration of the views from those areas to the settlements of the County Borough. New development within settlements must be designed to provide an attractive transition between the urban areas and the countryside.

Traffic and Transport

The Council's Principal Highways Development Control Officer has assessed the submitted Scoping Report and agrees with the methodology as proposed in section 3.6 (Recommendations and Mitigations) which details the Construction Traffic Management Plan and the PRoW Management Plan.

Ecology

The site overlaps with a number of SINC's and therefore is subject to Policy DNP5(2) Local and Regional Nature Conservation Sites which states that development within a SINC should be compatible with the nature conservation or scientific interest of the area, whilst promoting their educational role.

The local Authorities ecologist has advised the approach to date in regard to ecology has been reasonable and welcome the further surveys they are proposing. They will need to provide mitigation measures to ensure no harm to existing priority habitats or protected species and enhancement proposals to ensure there is a net benefit to biodiversity, which will allow us the LPA to provide more informed comments on the impact this development would have on habitats, species and the ecology and ecological resilience of the site and its surroundings. The applicant has identified a number of potential impacts at this stage which would be without mitigation, so the mitigation to be proposed is key to ensuring this development is viable from an ecology perspective.

Ornithology

The Local Authority's ecologist has raised no issues, as such the LPA agrees with the assessment, and the recommendations and mitigations as set out in section 5.6 of the Scoping report.

Historic Environment

Policy SP18 states that development proposals must protect, conserve, and, where appropriate, preserve and enhance the significance of historic assets, including their settings.

Development proposals will only be permitted if it preserves or enhances the character the character of the area. The LPA is generally satisfied that the scheme as highlighted in section 6.3 of the report will not be detrimental to the Historic Landscape in line with the proposed methodology.

Hydrology, Geology and Hydrogeology

The LPA agrees with the assessment, and the recommendations and mitigations as set out in section 7 of the Scoping report..

Coal mining

The site is also located within a number of Category 1 and 2 Mineral Safeguarding Zones as defined by Policy ENT12 of the RLDP. Development proposals within mineral safeguarding zones, either permanent or temporary, will need to demonstrate that:

1. If permanent development, the mineral can be extracted prior to the development, and/or the mineral is present in such limited quantity or quality to make extraction of no or little value as a finite resource; and
2. In the case of residential development, the scale and location of the development e.g. limited infill/house extensions, would have no significant impact on the possible working of the resource; and
3. In the case of temporary development, it can be implemented, and the site restored within the timescale the mineral is likely to be required.

Environmental Aspects scoped Out

Due to the nature of the proposed development, the LPA agree with the list of matters to be scoped out of the ES.

I trust this information is of assistance.

Yours sincerely,



STEVEN JENKINS
TEAM LEADER DEVELOPMENT CONTROL

Ms. Marloes Holtkamp,
Planning Officer
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Crown Buildings,
Cathays Park,
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PEDW.Infrastructure@gov.wales

Fy Nghyf/My Ref:
25/0391/CNEI

Gofynnwch am-Please ask for:
Giles Howard [REDACTED]

Dyddiad/Date:
20/05/2025

**DATBLYGIAD
ARFAETHEDIG/
PROPOSAL :** Upper Ogmores Wind Farm electricity network infrastructure connection, comprising of both underground cables and 66 kV overhead lines which will provide a connection between Upper Ogmores Wind Farm and the wider national grid, ref: CAS-03678-M4Y0G7

**LLEOLIAD
/LOCATION:** Upper Ogmores Wind Farm, Land at Blaengarw, Nant Y Moel, Bridgend

Dear Ms Holtkamp,

I refer to your correspondence dated 4th April 2025, concerning the above and your request for observations on the scoping request you have received.

Firstly, it is noted that none of the infrastructure work would fall within the administrative boundary of Rhondda Cynon Taf and that within 2km of the boundary is proposed to comprise underground cable. Consequently, it is considered highly unlikely that the development would have a potential physical or operational transboundary impact of significance.

Secondly, for information, having corresponded with relevant internal Council departments I can provide the following consultee comments:

Ecology - there is important SSSI habitat on the RCT side of the county Boundary line with Bridgend within this area, with key biodiversity issues including peat bogs and upland heath/acid/marshy grassland mosaics. There is also the potential for golden plover wintering flocks, and birds of prey use of the landscape and bat movements (particularly seasonal movements). Therefore, there is a sensitive biodiversity context and any development should deliver effective nature conservation mitigation and enhancement, with a particular reference to the priority habitat and species context of the area.

Highways - the development would have no impact on the public highway within Rhondda Cynon Taf.

Public Health and Protection – no observations to make.

Yr eiddoch yn gywir / Yours faithfully,

Giles Howard
Team Leader – Development Management

Simon Gale
Cyfarwyddwr Materion Ffyniant a Datblygu
Director of Prosperity and Development
Cyngor Bwrdeistref Sirol Rhondda Cynon Taf
Rhondda Cynon Taf County Borough Council
Llawr 2, 2 Llys Cadwyn, Stryd y Taf,
Floor 2, 2 Llys Cadwyn, Taff Street,
Pontypridd, CF37 4TH

Dylid cyfeirio pob gohebiaeth at/All correspondence should be addressed to
Cymorth i Fusnesau, Tŷ Elái, Ystad Ddiwydiannol Dinas Isaf, Trewiliam, Tonypanyd, CF40 1NY
Business Support Unit, Ty Elai, Dinas Isaf Industrial Estate, Williamstown, Tonypanyd, CF40 1NY



MAE EICH DATA O BWYS www.rctcbc.gov.uk/diogeludata
YOUR DATA MATTERS www.rctcbc.gov.uk/dataprotection



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

Ein cyf/Our ref: CAS- 278304-L2R2
Eich cyf/Your ref: CAS-03678-
M4Y0G7

Dyddiad/Date: 09 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

**THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES)
ORDER 2016**

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(WALES) REGULATIONS 2017 POTENTIAL DNS APPLICATION**

**BWRIAD/PROPOSAL: UPPER OGMORE WIND FARM ELECTRICITY NETWORK
INFRASTRUCTURE CONNECTION, COMPRISING OF BOTH UNDERGROUND
CABLES AND 66 KV OVERHEAD LINES WHICH WILL PROVIDE A CONNECTION
BETWEEN UPPER OGMORE WIND FARM AND THE WIDER NATIONAL GRID.**

**LLEOLIAD/LOCATION: UPPER OGMORE WIND FARM, LAND AT BLAENGARW, NANT
Y MOEL, BRIDGEND**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above.

We have reviewed the submitted 'Upper Ogmores Grid Connection Scoping Report', prepared by WSP dated April 2025. We are commenting because we consider the proposals are likely to give rise to significant effects.

We advise the following likely significant effects are assessed by the applicant and consider they should be 'scoped in' to any future Environmental Statement (ES).

1.0 General

In general, the ES for this development should include sufficient information to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.

Evaluation of the impacts of the scheme should include: direct and indirect; cumulative; short, medium and long term; permanent and temporary; positive and negative, construction, operation and decommissioning / post operational phases and impacts on the long-term site security impacts of the nature conservation resource.

The scoping report contains a limited description of the project at present. Within the EIA, the proposed scheme should be described in detail and in its entirety. This description should cover construction, operation and decommissioning phases as appropriate and include detailed, scaled maps and drawings.

We would expect the description to include:

- The purpose and physical characteristics of the proposal;
- Location, development size and configuration of the development including flexibility of the site layout;
- Procedures for good working practices;
- Timing of all works and contingency plans should slippage in the programme occur;
- Maintenance requirements of structures;
- Arrangements for the clearance, maintenance and management during operation, of any habitats within the site

Illustrations within the ES

Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the EIA such as biodiversity.

Description of Biodiversity

The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Key Habitats

Any habitat surveys should accord with the "[Handbook for Phase 1 habitat survey – a technique for environmental audit \(2010\) | JNCC Resource Hub](#)". We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

2.0 Ecology

2.1 Protected Species

Site Surveys

We welcome that 'Ecology' is being scoped into the ES. We note that a UKHab assessment was carried out in April 2024. In contrast, in Wales we advise that Phase 1 habitat surveys are undertaken, and where any existing classifications have been made they should be related to Phase 1 as far as possible.

The survey area included the development area as well as a 50m buffer. We advise that the EIA should consider in detail the potential presence of protected species alongside methods and results of all survey undertaken.

Targeted species surveys should be undertaken for all species scoped in, which:

- i. are undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA

These survey results remain valid for two years from the date of survey, and we advise that survey would need to be updated for applications that are submitted after this time period. We note that bats and water voles are scoped in for further survey as part of the EIA, whereas otter and dormouse have been scoped out of further assessment. We provide comment on some of these species below.

Species Scoped out

Great Crested Newts

Great Crested Newt (GCN) records exist over 8km away from the development boundary. We note that survey for GCN has been undertaken identifying 3 ponds, P1 – P3, within 250m of the site. HSI survey was undertaken on the 3 ponds in June 2024, which found P1 to be completely dry and P2 and P3 were inaccessible due to access issues.

We welcome the additional information provided which concludes that P1 is likely to dry out annually, and that P2 and P3 lie within 130m of the underground cable route which will be restricted to the highway and therefore there are no direct impacts to ponds or to any suitable terrestrial habitat will be impacted by the development.

We therefore agree with the conclusions made in respect of Great Crested Newt and have no further comment to make on this species.

Dormice

There are records of Dormouse >5km from the development boundary, to the south. We note there appears to be limited potential dormouse habitat within the development site. The PEA concludes that dormice will not be impacted by the proposal. We agree with the conclusions made in respect of Dormice and have no further comments to make on this species.

Otter

There are otter records within 1.3km to the west and north of the development. The PEA states that small streams are present at the south-western end of the proposed route, noting these are less well connected to other large watercourses.

We note that there will be no direct impact to riparian habitats from the development and any indirect impacts will be short term. The PEA states that it is possible that occasional dispersal of otters through the network of tributaries occurs on-site, but unlikely to support regular foraging or sheltering.

Whilst we agree with the conclusions made in respect of otter, we advise that appropriate buffers are designed from the development to all water courses / riparian habitat on site, and where works are undertaken in the vicinity of water courses, that pre construction surveys are included within the Construction Environmental Management Plan (CEMP).

Species Scoped In

Bats

Bat roosts

We note that all trees with potential to be affected by the development were inspected from ground level in September 2024. We recognise that within 'Area 2', trees were identified as having PRF's . However we note and welcome that the development can avoid these trees. Survey within 'Area 4' identified at least 10 trees identified with Potential Roost Feature's (PRF -M) , and 4 trees identified with PRF-I. We welcome that additional climbing / emergence inspections are being undertaken of trees within this Area.

We advise that all surveys are undertaken in accordance with the following guidelines and are submitted with the formal application; '*Bat Surveys for Professional Ecologists – Good Practice Guidelines*' (4th edition), published by the Bat Conservation Trust, 2023.

We note the intention to ensure a minimum clearance of 4m from lines and poles to trees. In the event that trees will require removal within woodland we advise that bat activity surveys are undertaken.

We advise that survey results are used to determine minimum stand off buffers from sensitive habitats to bats and where possible all features with suitability for bats should be retained and poles micro sited away from features and areas of sensitivity.

We further advise that all trees to be impacted by the works are clearly marked on a submitted plan, including their potential for roosting bats.

Water vole

We note that water vole have been recorded within the development site during a site walkover. The south west corner of the site comprises several small well connected streams and surrounding boggy purple moor grass and rush habitats, identified as suitable to support water vole. We note that the proposals will impact on suitable terrestrial habitat where evidence has been noted.

We welcome that water vole survey is being undertaken, we advise that survey is undertaken along the length of the overhead line route including a walkover of all watercourses within the site to search for signs of the species. We advise that survey considers the water courses and the surrounding suitable habitat extending beyond the immediate water environment, considering that water voles may exhibit a fossorial lifestyle.

We advise that results of survey further inform the route design of the development, and any proposed mitigation measures. Poles should be located as far away from water vole habitat as possible. Where possible, habitat suitable for supporting water vole should be retained and protected and minimum development buffers utilised to protect water vole habitat.

Where water vole are recorded on site, and habitat cannot be adequately avoided we advise that the principles of a Conservation Plan for the species is included within an application.

Impact Assessment

Should protected species be found during the above surveys, we advise that the EIA includes information identifying the species specific impacts in the short, medium and long term together with any details of retention, mitigation and / or compensation measures proposed to offset the impacts identified.

Where proposals concern protected species which are also notified features of designated sites (E.g. SAC, SSSI), we advise that the EIA considers the impacts on those species from

both perspectives. We also advise that the relevant Environment Team are consulted on the proposals.

We advise that the EIA sets out how the long term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the EA.

EPS Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The EIA must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. These requirements are also translated into planning policy through Planning Policy Wales (PPW) December 2018, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the EIA where a European Protected Species is present.

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and are that are considered important for the conservation of biological diversity in Wales. NRW would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g. bat groups, mammal groups).

2.2 Terrestrial Ornithology

The scoping report has identified that breeding birds are within the survey area and may be impacted by the project. We note that ecological survey have been proposed. These surveys should be in line with industry best practice (see [Bird Survey Guidelines](#)). Additional, species-specific surveys should also be considered and should be informed by the habitat on site as well as the results of any desktop survey conducted to date. Surveys for birds during the non-breeding season may also be required; this will be informed by more robust desktop surveys. Surveys both during the breeding and non-breeding season should take into account the need to determine impacts on protected sites with bird features within the zone of influence of the proposal. Surveys for barn owls should refer to [Barn Owl Survey Methodology and Techniques for use in Ecological Assessment | CIEEM](#)

We advise these are include within the ES and consideration be given to the likely significant effects on these species and propose appropriate avoidance, minimisation, mitigation and/or compensation following the stepwise approach within [Planning Policy Wales \(PPW\) February 2024](#).

2.3 Designated Sites

We note that there are no protected sites likely to be directly impacted by these proposals. However, we note that the scheme could pose impacts on important habitats including the potential loss and degradation of nationally important section 7 habitats, particularly within the Sites of Importance for Nature Conservation (SINC) sites. We advise further the applicant liaise with the relevant Authority and their ecologist to understanding the impacts and mitigation requirements for these SINC sites.

3.0 Water Resources and Flood Risk

3.1 Water Resources

The Western part of the cable route crosses multiple small waterbodies close to the Afon Llynfi, increasing the possibility for impact caused by the works. Therefore, due to the risk of potential impact to the aquatic environment we recommend that a Water Framework Directive (WFD) assessment is undertaken. Any works should not lead to a deterioration in that waterbody or prevent that waterbody from meeting a good status/potential.

Based on the risk of potential harm to the aquatic environment we would like to see an overarching CEMP alongside site specific CEMPs where river crossings are used and/or underground cabling is to be installed. The risk of silt mobilisation and run off is high therefore the CEMPs should include detailed information regarding robust mitigation measures to be deployed at each relevant location.

We would advise the following is considered in any submitted CEMP and would advise the determining body this should be secured via condition:

The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.

- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater, and energy use.
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.

- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

3.2 Groundwater

We note it is stated within the Scoping that its intended to undertake a Phase 1 Geoenvironmental Desk Study as part of the EIA, and this Study will inform upon the need and scope of a Phase 2 Ground Investigation if/where merited. We would be happy to review this once submitted.

It is stated that Decommissioning will not include removal of the underground cable (and assumed) underground joint bays but that the potential exists that the cabling would be integrated into the NGED wider distribution network. The nature and upkeep of the buried parts of the network is currently unknown/undefined, that is, whether buried cabling would be routinely replaced because of degradation/loss of efficacy.

We therefore advise that information is submitted in the ES on the long-term management of buried cabling and associated buried assets, notably on the potential for degradation and the release of chemicals that comprise the cabling as this would inform upon the need for the following:

The provision of a Buried Cabling Risk Assessment (BCRA) as an EIA deliverable *if* cabling will remain in the ground in perpetuity following decommissioning. This aligns with the Well-being of Future Generations Act (Wales) which mandates sustainable decision-making. The presence of persistent chemicals in buried cabling could:

- Contradict the Act's environmental sustainability goals if future generations are left with contamination risks.
- Require a more circular economy approach, ensuring renewable projects do not leave hazardous legacy materials.
- Justify stricter environmental standards for cable selection in planning approvals, promoting biodegradable or fully recyclable cabling.

The BCRA must consider the potential release of chemicals, including from non-fluid filled cables that comprise the total length of cabling remaining in the ground over the timeframe of 'Perpetuity'. A BCRA may include the following but is not meant to be a definitive statement or scope but rather as an illustration as to what could be considered within a meaningful BCRA:

- Define the Scope of the Assessment
- Specify the type and quantity of cabling (e.g., voltage, insulation type, conductor material).
- Assess the total length of cabling that will be left in the ground.
- Define how a meaningful BCRA could be performed. Decide if a desk-based approach is sufficient or not.

- Data Collection & Site Characterization – reliance on desk-based information or not? Environmental conditions such as pH, climate and hydrology.
- Identify Potential Contaminants & Release Mechanisms – leaching rates?
- Contaminant Fate & Transport Modelling – the nature of the site, its environmental sensitivity, and the types of cables used are influencing factors in the type of modelling deemed reasonable.
- Risk Assessment & Exposure Pathways – consideration of the source-pathway-receptor linkage model with potential climate change influencing factors.
- Mitigation & Remediation Strategies

Examples:

- Use of Halogen-Free Cables:
 - Reduces risks from brominated flame retardants and chlorine-based compounds.
- XLPE Instead of PVC Insulation:
 - XLPE has a lower potential for releasing phthalates and chlorine compounds.
- Corrosion Protection for Metal Conductors:
 - Properly jacketed cables and controlled soil conditions (e.g., pH-neutral environment) prevent copper and aluminium leaching.
- End-of-Life Management:
 - Mandating removal or recycling of cables rather than leaving them in the ground ensures future contamination risks are minimized.

3.3 Flood Risk

We note the majority of the cable route lies outside an area at risk of flooding, however, some sections may cross areas at risk of flooding. We advise further consultation with the relevant lead local authority on surface water flooding. A flood risk activity permit (FRAP) may be required from us, for example to construct a structure on the bank of a main river. Any works affecting an ordinary watercourse may require an Ordinary Watercourse Consent from the relevant Lead Local Flood Authority.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Lindy Marshall
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Planning and Environment Decisions Wales

Eich cyfeirnod
Your reference**CAS-03678-M4Y0G7**

Sent by email

Ein cyfeirnod
Our referenceDyddiad
Date

1 May 2025

Llinell uniongyrchol
Direct lineEbost
Email:Cadwplanning@gov.wales

Dear Sir / Madam,

EIA Scoping - DNS - Upper Ogmores Grid Connection REF: CAS-03678-M4Y0G7

Thank you for your letter asking for Cadw's view on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

AdviceWithin the application area:Scheduled Monuments

GM231 Clawdd Mawr, Mynydd Caerau

Within a 2km developer ZTV:Scheduled Monuments

GM232 Mynydd Caerau Round Cairns

GM243 Carn y Hyrddod & Neighbouring Cairn

GM278 Earthwork 360m NNE of Crug yr Avan

Registered Historic Landscapes

HLW (MGI) 5 The Rhondda

Listed Buildings:

18495 Salem Welsh Baptist Chapel (grade II*)

The request for a scoping opinion is accompanied by a scoping report prepared by WSP, with Chapter 6 considering the information sources used to inform the scope of the assessment. It provides an overview of the baseline conditions relevant to Historic Environment within the vicinity of the Site boundary; the likely significant effects to be considered within the assessment and measures which can be incorporated into the Project to mitigate any potential significant effect. In general, we agree with the contents of this chapter, including the study areas; the likely significant historic environment effects and those assets that can be scoped out of further assessment: However, we have concerns about the form of the proposed further assessments that are required to determine the full impact of the proposed development. We note that a draft HEDBA has been prepared but without viewing this document we cannot determine the likelihood that previously unrecorded archaeological sites are located on the cable route and if there is a need for additional surveys such as geophysical survey or archaeological evaluation to be carried out prior to the submission of the application. The requirements of section 6.1.26 of Planning Policy Wales should be noted and sufficient time included in the preparation of the environmental statement to allow the required surveys to be completed before it is submitted.

Finally, we have significant concerns about the proposal to over sail scheduled monument GM231 Clawdd Mawr, Mynydd Caerau with the cables. This proposal is likely to have an impact that will constitute an unacceptably damaging effect upon the setting of scheduled monument, which would be contrary to section 6.1.24 of Planning Policy Wales. It is therefore strongly recommended that the applicant should seek an alternative route for the cable in this area

Yours sincerely

Nichola Smith
Historic Environment Branch

Uned Pridd, Mawndiroedd a Chynllunio Defnydd Tir Amaethyddol
Soil, Peatland & Agricultural Land Use Planning Unit

Yr Adran dros Newid Hinsawdd a Materion Gwledig
Department for Climate Change & Rural Affairs.



Llywodraeth Cymru
Welsh Government

Ref: DNS CAS-03678-M4Y0G7

Marloes Holtkamp
Planning Officer
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Via Email: PEDW.Infrastructure@gov.wales

2nd of May 2025.

Dear Marloes Holtkamp,

Re: Scoping Direction Consultation Response – DNS CAS-03678-M4Y0G7 - Upper Ogmores Grid Connection.

I refer to the letter dated 2nd of April from PEDW, consulting the Department on the above Scoping Direction request. The Department offers the following response for your consideration with regard to the use of soil, peat resources and agricultural land quality.

1. Peat Soils and Peatland Habitats:

The Department agrees with the assessment as noted in Section 9.5.26 to 9.5.29 of the Scoping Report.

Peat Soils and Peatland Habitats can be scoped out of the assessment.

2. Agricultural Land Classification (ALC):

The Department does not hold any information on detailed ALC field surveys for the site. According to the Predictive ALC Map for Wales¹, the site is considered at best Grade 4. The Department agrees with the assessment in Section 9.5.30- 9.5.31 of the Scoping report. A detailed ALC field survey is not recommended on this site nor the application of Best and Most Versatile (BMV) agricultural land policy (PPW, paragraph 3.58 and 3.59).

BMV agricultural land can be scoped out of the assessment.

¹ <https://www.gov.wales/agricultural-land-classification-predictive-map>

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous.

Yours sincerely

Arwel Williams
Soil, Peatland & Agricultural Land Use Planning Unit
Landscapes, Nature & Forestry Division
Department for Climate Change & Rural Affairs
Welsh Government
LQAS@gov.wales

From: Shirley Rance **On Behalf Of** NSIP Applications

Sent: 14 April 2025 08:49

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Cc: NSIP Applications <NSIP.Applications@hse.gov.uk>

Subject: DNS CAS-03678-M4Y0G7 - Upper Ogmore Grid Connection - EIA Scoping Consultation - HSE Response

Dear Marloes Holtkamp

Thank you for your email dated 4 April 2025 consulting HSE on the Proposed Upper Ogmore Grid Connection - Development of National Significance (DNS).

Please find HSE's advice below.

HSE's Land Use Planning Advice (CEM HD5 Contribution)

1. With reference to the proposed **Overhead Line** and **Underground Cable** routes shown on **Figure 1.1 Site location (Pennant Walters Upper Ogmore Scoping Report, January 2025)** found in [<https://planningcasework.service.gov.wales/case> Reference: **DNS CAS-03678-M4Y0G7 - Upper Ogmore Grid Connection. Document: 2025-04-03 - EIA Scoping Request - Figure 1.1 - Site Location Plan**] the proposed project does not fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).
2. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.
3. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

4. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC

is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

5. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
6. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Regards

NSIP Consultation Team
Health and Safety Executive

Shirley Rance | Business Support Team

Health and Safety Executive | CEMHD - DBST

NSIP.Applications@hse.gov.uk





The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Ms M Holtkamp - Planning Officer

Bridgend County Borough Council

[By email: PEDW.Infrastructure@gov.wales]

6th May 2025

Dear Ms Holtkamp

Re: CAS-03678-M4Y0G7 - Upper Ogmores Wind Farm electricity network infrastructure connection, comprising of both underground cables and 66 kV overhead lines which will provide a connection between Upper Ogmores Wind Farm and the wider national grid.; Upper Ogmores Wind Farm, Land at Blaengarw, Nant Y Moel, Bridgend

Thank you for your notification of the 4th April 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the area identified for the project there are recorded coal mining features present at surface and shallow depth including; mine entries and coal workings. These features pose a potential risk to surface stability and public safety.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The submission is supported by a Scoping Report, dated April 2025 and prepared by WSP. Section 8 of this report covers coal mining and acknowledges the potential risks posed by the recorded coal mining features. The authors of this report recommend that a CMRA is undertaken to assess any risks posed by past coal mining activity to the proposed development.

We are pleased to see that risks posed by past coal mining features are to be properly assessed. The Planning team have no specific preference as to whether the CMRA is included in any future ES or submitted as a standalone document.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely


Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.

In formulating this response the Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development the Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisors for this development in relation to ground conditions and the acceptability of development.

From: Building Regulations (Central) <bregs@mawwfire.gov.uk>

Sent: 07 April 2025 09:27

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Subject: RE: EIA Scoping Consultation - DNS CAS-03678-M4Y0G7 - Upper Ogmores Grid Connection

Good Morning,

Thank you for your consultation request. Unfortunately, this falls outside of our Service area and will be dealt with by South Wales FRS.

Kind Regards,

Kay Thomas

Cydlynnydd Rheoliadau Adeiladu
Building Regulations Co-ordinator

Lleihau Risg yn y Gymuned
Community Risk Reduction

(Mewnol/Internal: Ext. [REDACTED])

(Allanol/External: [REDACTED])

* E-Bost/E-Mail: bregs@mawwfire.gov.uk

: Gwefan/Website: www.mawwfire.gov.uk

Cadwch yn ddiogel  Stay Safe





Planning and Environment
Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ
PEDW.Infrastructure@gov.wales

Our Ref: LA/99-15044 (BR13)
Your Ref: DNCAS-03678-M470G7
Date: 16 June 2025
Contact: Station Manager L. Abdul
Tel: [REDACTED]
E-mail: firesafety@southwales-fire.gov.uk

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990
PROPOSAL: UPPER OGMORE WIND FARM ELECTRICITY NETWORK
INFRASTRUCTURE CONNECTION, COMPRISING OF BOTH UNDERGROUND
CABLES AND 66 KV OVERHEAD LINES WHICH WILL PROVIDE A CONNECTION
BETWEEN UPPER OGMORE WIND FARM AND THE WIDER NATIONAL GRID.
LOCATION: UPPER OGMORE WIND FARM, LAND AT BLAENGARW, NANT Y
MOEL, BRIDGEND**

I acknowledge receipt of the notification to the South Wales Fire and Rescue Authority ("The Authority") in relation to the above application.

The proposed site plan in relation to the above has been examined and The Authority wish the following comments to be brought to the attention of the committee/applicant. It is important that these matters are dealt with in the early stages of any proposed development.

Changes to our climate and weather patterns will have a significant impact on the well-being of both current and future generations. In line with the **Well-being of Future Generations (Wales) Act 2015** and the **Future Wales – the national plan 2040** framework document, the following areas should be considered early in the planning process:

The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, more frequent severe weather systems and more intense rainfall. Planning authorities should adopt a precautionary approach of positive avoidance of building developments in areas of flooding from the sea or from rivers. Surface water flooding will affect the choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating any development proposals.

Wildfires are a significant potential threat particularly in populated areas adjoining green spaces such as mountains or forestry. Therefore, it is critical that new developments are designed with this in mind. Where a new development is proposed in an area which is at risk of a wildfire, consideration should be given on how to mitigate the spread of wildfires. For example, sustainable land management could assist with prevention measures.

Pencadlys Gwasanaeth Tân ac Achub De Cymru,
Parc Busnes Forest View, Llantrisant, Pont-y-clun, CF72 8LX.

Ffôn 01443 232000 • Ffacs 01443 232180
www.decymru-tan.gov.uk

Rydym yn croesawu gohebiaeth yn y gymraeg a'r saesneg - byddwn yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich dewis iaith heb oedi.

CODI YMWHYBYDDIAETH - LLEIHAU PERYGL

South Wales Fire and Rescue Service Headquarters,
Forest View Business Park, Llantrisant, Pontyclun, CF72 8LX.

Telephone 01443 232000 • Fax 01443 232180
www.southwales-fire.gov.uk

We welcome correspondence in Welsh and English - we will respond equally to both and will reply in your language of choice without delay.

RAISING AWARENESS - REDUCING RISK

Fire Safety Considerations for Wind Farms:

Wind farms present unique fire safety challenges due to their remote locations, tall structures, and electrical and mechanical components. While not classified under traditional industrial risk categories, wind turbines can pose significant fire risks, including electrical faults and fires in turbine nacelles.

Firefighting access and adequate water supply are critical considerations for wind farm developments. Developers should ensure that site access routes are suitable for fire appliances and that sufficient firefighting water resources are available on or near the site, in line with national guidance and local authority requirements.

Early engagement with the Fire and Rescue Authority is encouraged to assess site-specific risks and develop appropriate fire safety and emergency response plans tailored to the unique characteristics of wind farm sites.

Large Commercial Solar Arrays, Battery Energy storage Facilities, Electric Vehicle Parking/Charging Facilities:

Fires involving the installations detailed above can be very difficult to extinguish. Conditions can cause a thermal runaway within battery cells, which is a highly exothermic reaction creating toxic, flammable, and/or explosive chemical atmospheres.

The developer of such sites should ensure they have suitable safety measures to contain and restrict the spread of fire, using fire-resistant materials and adequate separation between locations where energy systems may be stored.

Active fire safety systems should be incorporated into the design if necessary and may include, automatic fire detection systems, automatic fire suppression and smoke control systems.

The Authority recognises that the charging of electric vehicles and the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry, developers should consider the risks associated with such systems early in the design stage of the project.

Standing Advice.

Upon examination of the submitted site plan, the Authority provides the following standard advice to assist the planning authority and developer. It is important that these considerations are addressed early in the development (delete as appropriate)

- The Fire Authority has no objection to the proposal and refers the Local Planning Authority to current standing advice issued by the Authority.

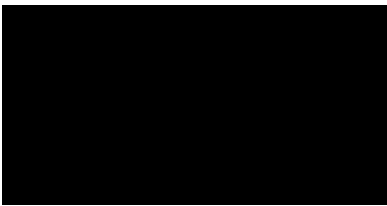
The developer should also consider the need for the provision of:-

- a. adequate water supplies on the site for firefighting purposes; and
- b. access for emergency firefighting appliances

Should the applicant require further information in relation to these matters they should contact the above named fire safety officer.

Yours faithfully,

Duly signed and authorised by



for Assistant Chief Fire Officer

cc: WATERGEN@southwales-fire.gov.uk

Enc: BR13 Appendix

Appendix

1.0 Access For Fire Appliances

Typical vehicle access route requirements:

Appliance Type	Min Width Road	Min Width Gate	Min Turning Circle between Kerb
Pump	3.7m	3.1m	16.8m
Aerial Appliance	3.7m	3.1m	26.9m

Min Turning between Wall	Min Height Clearance	Min Capacity Tonnes
19.2	3.7m	14
29.0	4.0m	23

Pedestrian Priority

Pedestrian schemes must take into account the need for permanent and unobstructed access for firefighting appliances. The siting of ornamental structures such as flower beds, must take account, not only of the access requirements of the fire appliances but the need to be able to site them in strategic positions; in particular, account must be taken of the working space requirements for aerial appliances. Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure adequate access for fire appliances, their siting and use.

2.0 Water Supplies for Firefighting

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to cater for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Access to Open Water Supplies

Where development of waterfront sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

2.1 Housing

Minimum main size 100mm. Housing developments with units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

Housing developments with units of more than two floors should have a water supply capable of delivering a minimum of 20 to 35 litres per second through any hydrant on the development.

2.2 Transportation

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100mm. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

2.3 Industry

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any Industrial estate is as follows:

Light Industrial

Minimum Main Size 100mm
Up to one hectare, 20 litres per second

Commercial/Industrial

Up to two hectares, 35 litres per second - Minimum Main Size 150mm

High Risk Industrial

Two to three hectares 50 litres per second - Minimum Main Size 150mm.
Over three hectares, 75 litres per second.

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site at the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the earliest possible stage of the planning process to ensure that fire safety requirements are appropriately considered.

Developments involving higher risk premises may necessitate enhanced water flow rates and infrastructure, which must be identified and addressed through early engagement and site-specific assessment.

2.4 Shopping, Health and Community Facilities

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and single storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

2.6 Distances Between Fire Hydrants

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates (Subject to operational needs)	-	150 metres
Town centre areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hotels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Homes)	-	Adjacent to access
Old Persons Homes	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

2.7 Conclusion

Developers should engage in early, collaborative discussions with Dŵr Cymru Welsh Water, **Natural Resources Wales (NRW)**, and the Fire and Rescue Authority to ensure that adequate water supplies are available for firefighting purposes. The Fire and Rescue Authority reserves the right to require the provision of static water supplies on-site as a condition of planning consent where existing water supply infrastructure is insufficient to address the assessed fire risk. This approach aligns with current national guidance and legislation, including the **Well-being of Future Generations (Wales) Act. 2015**, **Building Regulations Approved Document B (Fire Safety 2019)**, and **British Standard BS 9990:2016** for firefighting water supplies.

From: ORC <ORC@dwrcymru.com>

Sent: 24 April 2025 14:49

To: PEDW – Seilwaith / Infrastructure <pedw.infrastructure@gov.wales>

Subject: FW: EIA Scoping Consultation - DNS CAS-03678-M4Y0G7 - Upper Ogmores Grid Connection

Hi Marloes,

Please see the below response.

Regards,

Katie Perman

TechOps Support

TechOps Service Team

Operations Services

Mobile: [REDACTED]



Please click [here](#) for the most up to date versions of our company **PT IMS forms**

From: Paul Bell [REDACTED]

Sent: 24 April 2025 14:48

To: ORC <ORC@dwrcymru.com>

Subject: RE: EIA Scoping Consultation - DNS CAS-03678-M4Y0G7 - Upper Ogmores Grid Connection

Hi ORC,

I don't believe this will impact on our Telemetry services within the area. Please can you close the job

Regards,

Paul

Paul Bell | Regional O&M Manager
Operational Technology Operations




For OT support – contact the [ORC](#) on 0303 313 0103

For OT news – visit our [OT Shop Window Yammer Community](#)



From: ORC <ORC@dwrwymru.com>

Sent: 04 April 2025 15:30

To: Paul Bell 

Subject: FW: EIA Scoping Consultation - DNS CAS-03678-M4Y0G7 - Upper Ogmore
Grid Connection

Hi Paul

Can you review the attached please.

HA192054

Thanks

Regards,

Katie Perman

TechOps Support

TechOps Service Team

Operations Services

Mobile: 



Please click [here](#) for the most up to date versions of our company **PT IMS forms**