

Upper Ogmore Wind Farm
Technical Appendix 6.2: Consultation
Meeting Minutes and Responses
(NRW)

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Wales

Mr Gareth Lang
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Ein cyf/Our ref: CAS-51413-P4G5
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Dyddiad/Date: 6 February 2018

Annwyl / Dear Mr Lang

PROPOSAL: PRE-APPLICATION ENQUIRY FOR WIND TURBINES

SITE ADDRESS: UPPER OGMORE WIND FARM

Further to our meeting of the 13 December 2017 at the RES Offices, Cardiff Gate in which we discussed the scope of the ornithology survey work and peat issues at the Upper Ogmores Wind Farm site and the submission of the meeting minutes, which we received on 2 January 2018. Please see our detailed comments regarding these minutes below.

Ornithology

Under point 1.5, last sentence of paragraph one where it says "RF indicated that post-construction monitoring may be requested". Richard Facey advised that we **will** require post construction monitoring (e.g. carcass surveys) to be brought forward.

Under point 1.6 "RF indicated that the need for monitoring will be reviewed following the receipt of the OIA". "Monitoring" here refers to additional survey, rather than post-construction/operational monitoring.

Peat

Please find attached legacy Countryside Council for Wales (CCW) guidance “Assessing the Impact of Windfarm Development on Peatlands” and general Pollution Prevention Guidance which can be found at the following link: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Also, SEPA have good links to guidance including information on peat which can be found at the following links:

<https://www.sepa.org.uk/media/136117/planning-guidance-on-on-shore-windfarms-developments.pdf>

<http://www.snh.org.uk/pdfs/strategy/renewables/Good%20practice%20during%20windfarm%20construction.pdf>

Ecology

We were not asked to provide wider ecology review as part of the pre-application discussions therefore discussions were only informal and formal comment will be provided by our Species Team once we receive the formal submission. We are happy that you acknowledged that further consideration will need to be given to any potential impacts on Water Vole. We would reiterate that we will need confirmation of the track route in the North East of the site to further understand any potential impacts and would also recommend that habitat enhancements for Water Vole are considered in the final submission.

Our comments above only relate specifically to matters that are included on our checklist Natural Resources Wales and Planning Consultations (March 2015) which is published on our website at this link (<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/our-role-in-planning-and-development/?lang=en>).

We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.



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I hope these comments are of assistance. If you have any queries, or if you require any further information, please do not hesitate to contact us at the above address.

Yn ddiffuant / Yours sincerely

Lisa Jones

Ymgynghorydd Cynllunio Datblygu/Development Planning Advisor

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Upper Ogmore Wind Farm Ornithology and Peat Pre-application Consultation

Weds 13 December 2017. RES offices, Cardiff Gate. Duration 09:45-11:25

Items:	Action								
<p>The meeting was requested through Natural Resources Wales' (NRW) Discretionary Pre-Planning Advice (DPA) service to discuss the scope of ornithological survey work and peat issues at the site. A budget for advice on wider ecology and protected species was not included in the DPA request.</p>									
<p>Present:</p> <p>Leila Thornton, Lisa Jones, Richard Facey, David Reed (present via telecom for peat discussions only) (Natural Resources Wales [NRW]); Gareth Lang (BSG Ecology); Chris Jackson, Mark Crabtree (RES).</p>									
<p>Introductions & Scene Setting:</p> <p>Apologies were made on behalf of Rhian Isaac of NRW who was unable to attend the meeting. David Reed from NRW (based in Aberystwyth) would be able to attend the discussion on peat via teleconference.</p> <p>For Natural Resources Wales:</p> <p>Rhian Isaac (RI) would continue to be the point of contact at NRW for the project with support from Lisa Jones (LJ) Richard Facey (RF) is a specialist on Ornithology at NRW (based in Cardiff) Leila Thornton (LT) is a Biodiversity Officer at NRW (based in Neath).</p> <p>For BSG Ecology:</p> <p>Gareth Lang (GL) has been managing the ecology and ornithology work for the project.</p> <p>For RES Ecology:</p> <p>Chris Jackson (CJ) is the project manager at RES Mark Crabtree (MC) is the design engineer for the project at RES</p> <p>CJ gave a brief overview of the proposed development, indicating it was unlikely to enter planning before April 2018. CJ Indicated that the layout is not final, with possibility of a reduction in the number of turbines and track alterations owing to various constraints (including landscape and visual impact).</p>									
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<p>1.5</p> <p>1.6</p> <p>1.7</p> <p>1.8</p>	<p>Following the overview of survey effort and results to date provided by GL, RF asked whether monitoring at the site was proposed. GL said that it wasn't due to the low level of activity by target species recorded during baseline surveys. RF indicated that nearby wind farm sites that had recorded similar (low) levels of peregrine activity had subsequently recorded a number of turbine collisions post-construction. GL acknowledged that there are a number of peregrine territories (both current and historical) surrounding the site, but that peregrine do not appear to fly over the site (likely owing to the lack of prey). RF also indicated that there is a potential for waterfowl passage over the site (based on observations at a similar site (in altitude and habitat) near Neath). With this in mind, RF indicated that post-construction monitoring may be requested as there is a lack of understanding regarding actual effects of wind farms on birds. GL asked about the setting of the sites at which waterfowl passage had been recorded, and suggested that there are likely to be geographical differences and that there's no evidence to suggest that waterfowl fly over Upper Ogmores.</p> <p>RF asked whether collision risk modelling would be included within the Ornithological Impact Assessment (OIA). GL indicated that it would be, and that impacts on species and populations will further be informed by a cumulative impact assessment. GL would submit a copy of the OIA to NRW ahead of formal submission for comment. RF indicated that the need for monitoring will be reviewed following receipt of the OIA.</p> <p>GL requested some guidance from RF on the scope of the cumulative assessment. RF stated that he would look into it.</p> <p>GL asked whether the baseline data would still be considered up-to-date given the anticipated submission date of June 2018. RF agreed that it would be (following SNH (2014) guidance on data longevity being valid up to 5 years).</p> <p>Summary: RF happy overall with baseline bird survey work. RF suggested that consideration should be given to monitoring depending on the outcome of collision risk modelling and assessment of impacts in the OIA.</p>	<p></p> <p>GL</p> <p>RF</p>
<p>2 Ecology</p>		
<p>2.1</p> <p>2.2</p> <p>2.3</p>	<p>GL gave a brief overview of the survey work completed for great crested newt, water vole, and bats.</p> <p>LT indicated that formal comment would be provided by the species team at scoping, but that water vole may need to be considered further if there are direct effects on streams within the site.</p> <p>GL suggested that construction phase checks would be completed and methods to avoid impacts on water vole would be implemented.</p> <p>Summary: Water vole is likely to require consideration at construction phase to ensure impacts are avoided. Formal comment on ecology will be given at the scoping stage.</p>	<p></p>
<p>3. Peat</p>		
<p>3.1</p> <p>3.2</p> <p>3.3</p>	<p>David Reed (DR) joined the meeting by teleconference (10:40).</p> <p>MC stated that peat surveys had been completed, and that a contour map of peat location had been provided to NRW. MC asked if DR was happy with the layout provided regarding impact on peat. DR acknowledged that it was evident that there has been an effort to avoid areas of deep peat. However, there may be some issues with the tracks between T7 and T3, and the tracks leading to T8.</p> <p>DR asked whether T8 could be relocated, and questioned why there were</p>	<p></p>

	multiple tracks leading to T8. MC advised that the tracks shown were options, and that only one would be needed. MC added that the turbine locations were restricted by a number of constraints (including geology and radio interference), but that it may be possible to rotate the crane pad of T8 out of the area of >0.5m peat.	
3.4	[MC sent a copy of the most recent layout (with single track to T8 illustrated) to DR via email during the teleconference]	
3.5	MC indicated that the current site access options include: 1) a spur off the Llynfi Afan Wind Farm site entrance, and 2) using the existing access to the Werfa Masts (which would require widening of the existing track). The first option would be the preference but depends on the outcome of discussions with the owner of Llynfi Afan Wind Farm. The second option would depend on consultation with CADW [the existing track passes through a Scheduled Ancient Monument (SAM) which appears to be degraded near to the track].	
3.6	DR added that the proposed track to T8 should float over the underlying peat resource to maintain the flow of groundwater between areas of deeper peat to the north and south. DR added that this could be achieved through use of larger rocks as a permeable bed to support the relatively impermeable material forming the track surface. MC agreed that this could be achievable.	
3.7	DR asked whether there was any botanical survey for this area. GL stated that a botanical survey report for the area was forthcoming. GL to issue botanical survey report to RES and NRW in early 2018.	GL
3.8	DR asked if turbine T3 could be moved to avoid the track passing over an area of deeper peat. MC suggested moving the track further east to avoid the deeper peat. DR accepted that this would minimise impacts.	
3.9	MC asked whether the track between T1 and T2 was ok in its current location. DR suggested that either proposed route would be satisfactory. MC stated that he would issue a revised scheme design layout (based on the alterations suggested during the meeting) with constraints (other than peat) removed.	MC
3.10	DR asked when it would be likely that a fix on the route to T8 would be determined. CJ stated that this would depend on the discussions with Llynfi Afan owners regarding use of that access.	
3.11	DR asked about the electricity outtake plans. CJ stated that the wind farm substation is likely to be sited immediately west of T4 with an overhead line connecting to WPD's substation at Pyle. It is hoped that the output could be carried by the Llynfi Afan line, but this depends on the outcome of discussions with WPD. CJ added that there is the possibility of battery storage at the same location as the substation. This may be included in the wind farm planning application depending on how quickly the grid discussions progress.	
3.12	MC asked about advice on peat waste. DR stated that peat moved should be kept wet until re-instatement, not piled too high and kept separate from glacial till. Peat should be replaced with as great a depth as possible, and not spread thinly. DR suggested that he would send on some legacy guidance relating to impacts on deep peat. LT added that she would send the document through with further pollution prevention guidance.	LT
3.13	LJ indicated that NRW would prepare a formal response to the meeting	LJ

	following receipt and review of the meeting minutes.	
3.14	CJ indicated that a scoping report for the site will be submitted early in 2018.	
3.15	Close [11:25] Summary: The turbine and infrastructure layout has been designed to avoid areas of deep peat. The location of the site access will depend on the outcome of discussions with the Llynfi Afan Wind Farm owners. The grid connection detail and inclusion of energy storage in the planning application for the wind farm will depend on how quickly discussions with WPD resolve.	



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Mr. Daniel Patterson,
Development Manager,
RES
Cedar House,
Cardiff, CF23 8RD.

Our ref: CAS-13525-N6P1
Your ref: Upper Ogmore Windfarm
Date: 16 February 2016

Annwyl/Dear Mr. Patterson,

Re; Pre-application enquiry for Wind Turbines – proposed Upper Ogmore Wind Farm.

Thank you for recently consulting Natural Resources Wales with regards to the proposed wind farm at Ogmore and please accept our sincere apologies for the belated response.

We have reviewed the following ecological reports by BSG Ecology:

- *'Extended Phase 1 Survey Report'* issued 22nd December 2014;
- *'Baseline Breeding Bird Report 2014'* issued 22nd December 2014; and
- *'Ecological Scoping report'* issued 7th December 2015.

Additionally we are conscious of similar previous planning proposals within the locality and accordingly we have taken the opportunity to liaise with;

1) Our Landscape Architect to assess the potential landscape implications of the proposals and

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Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ.
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www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk
Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

2) Our Environmental Management team regarding pollution prevention.

Our comments are as follows;

Ecology comments.

Our comments are made in reference to the above reports and considering the proposed site application boundary shown on the 'site location plan' by Renewable Energy Systems limited, drawing number '02959d2206-02'.

Extended Phase 1 Survey Report

We advise the application is supported by a baseline ecological survey that covers the whole application site boundary. We note the 'Extended Phase 1 Survey Report' covers a wider area to the south of the submitted site location plan, however the 'Phase 1 Survey Area' in Figure 1 of this report does not cover the whole footprint of the submitted site boundary.

Baseline Breeding Bird Report 2014

With regards to vantage point surveys and honey buzzard surveys we advise that vantage points cover the entirety of the proposed application boundary and follow best practice guidance, which can require the survey area to extend 500m beyond the site boundary. We note vantage point surveys used two vantage point locations shown on Figure 1, along with the honey buzzard survey vantage points shown in Figure 2. However these vantage points do not provide visual coverage of the whole of the submitted site boundary, including some of the proposed turbine locations shown in Figure 1 in the following 'Ecological Scoping report'.

Please note NRW also advises, in line with best practice guidelines, that vantage point locations should be located outside the development boundary, and use of hill/ridge summits should also be avoided to minimise surveyor presence on the site and the risk of bird flight behaviour being influenced by the presence of the surveyor.

Ecological Scoping report

We note further surveys are recommended for birds, bats, great crested newts and water voles and that they will follow published best practice guidance.

Details, additional from the above 'Baseline Breeding Bird Report 2014', are provided in this scoping report indicating additional surveys for merlin. However without any the

methods for these surveys or further information we are unable to provide advice at this stage.

We welcome that buildings on site have been assessed for their potential to support roosting bats and further surveys are proposed for 2016. However we advise confirmation is provided that if any trees within the proposed site or access track with the potential to support roosting bats and that maybe effected by the proposals are appropriately assessed.

We note in Figure 1 in this report the location of the four automated bat detectors but would advise clarification of the selected of these locations. Additionally we welcome the bat transect surveys but the details of the route have not been provided and we are unable to provide further comment at this stage.

NRW are able to provide further advice on receipt of the above information.

Other Ecological factors.

Our records indicate that there are some areas of peat within the site area which require particular attention in respect of these proposals. Surveys relating to peat depth or the consideration of hydrological impacts to date and/or potential are lacking, which need addressing. Appropriate mitigation measures of any impacts and long term management plans stem from these initial peat information/data.

Our records indicate that there are at least two (2) Sites of Special Scientific Interest (SSSI) either within the site boundary or lying just outside and by definition require appropriate consideration and protection. They are;

- Mynydd Ty-lsaf SSSI
- Cwm Cyffogand SSSI

Other matters.

Landscape.

Our advice relates to the potential impact on the Rhondda Registered Historic Landscape.

The site is adjacent the Rhondda Landscape of Special Historic Interest, which is included on the Register of Landscapes of Historic Interest in Wales. There are a number of Scheduled Monuments in and around the site, including cairns/barrows,

dykes, earthwork at Crug yr Avan & Mynydd Maendy hillfort. Some are within, some just outside the Registered Landscape. There are also a number of listed buildings, both within the Registered Landscape to the north east and to the south in the Garw & Ogmere valleys.

The proposal has the potential to adversely impact the setting of the Registered Landscape and the individual features within it. The impact of 8-9 turbines will vary according to their size and location within the site, but are likely to have a more than local impact on the Registered Landscape. An ASIDOHL2 assessment is recommended, in accordance with the *Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process* (CCW, Cadw, Welsh Assembly Government, 2nd Edition 2007). Given the numerous operational, consented and proposed wind farms in the area, we recommend that an assessment of the cumulative effects of wind turbines on the Registered Landscape is carried out as part of this assessment. Information on the Historic Landscape Characterisation and Historic Environment Record can be obtained from the Glamorgan Gwent Archaeological Trust.

The site lies outside but close to TAN8 SSAF. TAN8 advises that large scale (over 25MW) onshore wind developments should be concentrated into Strategic Search Areas. Most areas outside SSAs should remain free of large wind power schemes. Within and immediately adjacent to the SSAs, the implicit objective is to accept landscape change i.e. a significant change in landscape character from wind turbine development, however not all land within SSAs may be environmentally suitable for major wind power proposals and cumulative effects should also be considered.

Information from the ASIDOHL2 assessment should inform the Landscape and Visual Impact Assessment, which will also be required, and vice versa. The LVIA should be carried out in accordance with GLVIA3 and Landscape Institute/SNH guidance on use of photography/photomontages and visual representations of wind farms in LVIA. All 5 layers of LANDMAP should be consulted, along with any local Landscape Character Assessments. We also recommend that the Gillespies LLP guidance for the Heads of the Valleys is consulted as the site lies adjacent to the study area (*Planning guidance for Wind Turbine Development Landscape & Visual Impact Assessment & Heads of the Valleys Wind Turbine Development Landscape Sensitivity & Capacity Study*). A number of footpaths cross the site and parts of the open upland site are open access land with potential for wide ranging views. Cumulative effects with other wind farms in the area will need to be considered as part of the LVIA.

Environmental Management/Pollution prevention.

It is imperative that appropriate and robust environmental management/pollution prevention measures are implemented on site by the developers to avoid any unfortunate incidents which may cause environmental harm.

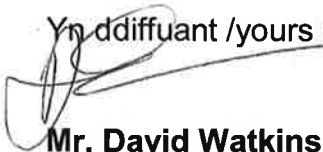
Our experience has shown that surface water runoff is a common problem associated with the construction phase of wind turbine developments and a sound surface water drainage regime is imperative to ensure an incident free building programme.

Such measures could include;

- Ensure appropriate steps have been proposed to maintain existing drainage paths and to avoid alternative preferential flow paths forming.
- Ensure that during development additional runoff from tracks will be dealt with via swales/small ponds in order to attenuate runoff rates, such that they do not exceed existing (greenfield) rates.
- Ensure that during development additional rate and volume of runoff from impermeable areas such as crane hard standing(s) will be managed via Sustainable Urban Drainage systems (SudS).
- Ensure that any trenches excavated on site for cabling are relatively short in length to avoid any potential large scale rainfall saturation and the resultant overtopping of surface water.

We hope the above comments are helpful however, please note that they do not set a precedent for our response to any formal application for planning permission or other legal consent. Such applications shall be assessed on the information submitted and regulations of relevance at that time. The details contained in this letter are based on the information available to date.

Yn ddifuant /yours sincerely



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