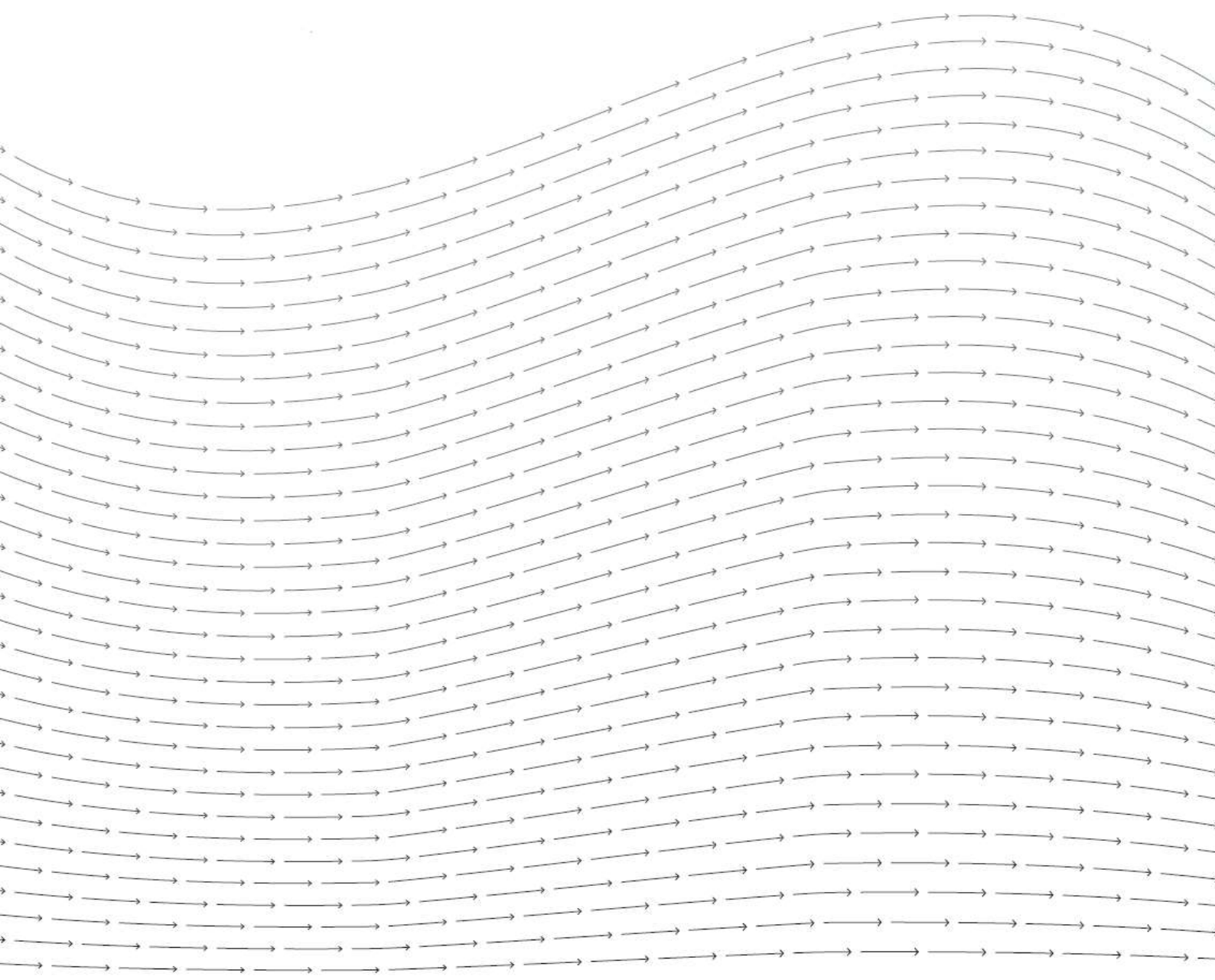




PENCARREG WIND TURBINES EIA Screening Request

Energiekontor UK Ltd

16/10/2020



Energiekontor – 4330 Park Approach – Thorpe Park – Leeds – LS15 8GB

**Energiekontor
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Carmarthenshire County Council
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16 October 2020

Our reference: Pencarreg_EIAScreeningRequest_1
Your reference:

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Dear Sirs

Request under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for a Screening Opinion in respect of two proposed wind turbines at Land to the north of Esgairliving Farm, Rhydcwmerau, Llandeilo

On behalf of Energiekontor UK Ltd (herein after referred to as ‘the Applicant’) I hereby request a Screening Opinion from the Carmarthenshire County Council (‘the Council’) under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regulations’) in relation to two proposed wind turbines at Land to the north of Esgairliving Farm, Rhydcwmerau, Llandeilo. This request is accompanied by the following:

- Appendix 1: Figures
 - Figure 1 – Site Location
 - Figure 2 – Site Layout
 - Figures 3 to 6 – Environmental Constraints
- Appendix 2: Updated Cumulative Context

As required under Regulation 6 of the EIA Regulations, a brief description of the Proposed Development, the site and its surrounding area are provided along with a summary of the possible effects on the environment.

Planning History

A Planning Application (Ref: W/31728, herein after referred to as ‘the Original Planning Application’) and accompanying environmental information was submitted by the Applicant under the Town and Country Planning Act 1990 for two turbines of 100m tip height, and associated infrastructure, at the same

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location as this submission on 18/03/2015, the Council considered the development non-EIA and subsequently granted planning permission on 08/03/2016 (herein after referred to as ‘the Original Planning Permission’).

Following this, an application (Ref: W/34341, herein after referred to as ‘the Variation Application’) was submitted by the Applicant to the Council on 05/08/2016 under section 73 of the Town and Country Planning Act 1990, in which a variation was sought for the aforementioned planning permission (Ref: W/31728) as to not comply with Condition 2, which stated that: *“The development shall be carried out in accordance with the following approved plans and documents:...Figure 3.1 Typical Wind Turbine Elevation”*. The Applicant proposed to supersede Figure 3.1 with a new Figure (Figure 3.1a), essentially requesting a 25m turbine tip height increase from 100m previously granted to 125m. Additional environmental information was provided with the section 73 Application, including landscape and visual and noise. The Council refused to grant the variation to Condition 2 on 13/03/2017, the reasons for the refusal were as follows:

- The proposed development is contrary to Policy RE2 of the Carmarthenshire Local Development Plan;
- The proposed development is contrary to Policy SP11 of the Carmarthenshire Local Development Plan; and
- The proposed development is contrary to Planning for Renewable Energy - Technical Advice Note: 8 Planning for Renewable Energy (2004).

The Applicant appealed under section 78 of the Town and Country Planning Act 1990 against the refusal to grant planning permission under section 73 of the Town and Country Planning Act 1990, providing a Statement of Case in April 2017.

The Welsh Minister’s appointed inspector (‘the Inspector’) provided an appeal decision (‘the Appeal Decision’) on 14/02/2018 in which the following main issues were considered:

- the landscape character of the site and surrounding area, particularly that of the Teifi Valley Special Landscape Area (“SLA”);
- the visual effect of the scheme, particularly on local residents and users of rights of way and publically accessible areas; and
- Whether any harm identified in relation to the foregoing is outweighed by any additional benefits of the scheme and its contribution to renewable energy production.

The Inspector’s decision was that the appeal should be allowed and planning permission granted Variation Application without compliance with Condition 2

previously imposed by the Original Planning Permission but subject to the conditions set out in the schedule attached to Inspector's Appeal Decision.

As a procedural matter, as stated in the Appeal Decision, during the appeal a screening direction was issued by the Welsh Ministers that concluded that *"the proposal is not 'EIA development'"*.

Following this, the Appeal Decision was challenged by a local resident (John Leslie Finney, 'the Claimant') in the High Court of Justice, in which it was argued *inter alia* that the Inspector should not have allowed the appeal because she had no power under section 73 to amend a condition pursuant to which a prior planning permission had been granted which had the effect of directly contradicting the description of the development permitted in that earlier permission (i.e. the Original Planning Permission)¹. Further or alternatively, the Claimant asserted that the Inspector failed to consider at all (as she should have done in accordance with established legal principles) whether the application before her constituted a "fundamental alteration" of the earlier permission. Following the hearing on 26/09/2018, the judge concluded that *"the Inspector did consider whether the application constituted a fundamental alteration of the original proposal and that it is proper to draw the inference from her decision letter read as a whole that she considered that it did not."* As such, the Claimant's application was dismissed, and the Appeal Decision stood.

The above High Court judgement was then appealed to the Court of Appeals in which the judge's ruling was contrary to that of the High Court and allowed the appeal; quashing the Inspector's Appeal Decision because it was *"beyond her powers"*².

It should be noted that through the entire aforementioned process the question of the acceptability of 125m turbines was based on the procedural appropriateness of using section 73 of the Town and Country Planning Act 1990 to vary an existing planning permission, and not whether the development itself of 125m would be unacceptable in planning/environmental terms. Again, to reiterate, the development at 125m was considered non-EIA development by both local and national authorities and was not disputed.

¹ <https://www.bailii.org/ew/cases/EWHC/Admin/2018/3073.html> (Last Accessed: 21/09/2020)

² <https://www.bailii.org/ew/cases/EWCA/Civ/2019/1868.html> (Last Accessed: 21/09/2020)

The Site

The development site (herein after referred to as 'Site') is approximately 6.4 hectares and is shown in Appendix 1, Figure 1 – Site Location. The Site is located approximately 5km to the south west of Llanybydder and 2km to the north of the village of Rhydcymerau, above Esgairliving Farm. The west the Site is bound by the Lon Felin Rhydybont road. The Site is bound by the B4337. Further afield to the north lies the parish of Pencarreg.

The Proposed Development

The development consists of two turbines with blade tip heights of up to 125 metres, rotor diameters of approximately 100m and a hub height of approximately 75m, with final dimensions subject to turbine selection as part of a competitive tendering exercise. The installed capacity of the development would be in the region of 5MW. The development would also consist of associated infrastructure including turbine foundations, new and upgraded tracks, crane hardstandings, temporary storage area, substation, upgraded site entrance and temporary construction compound (herein after referred to as 'the Proposed Development' – see Appendix 1, Figure 2 – Site Layout). Further detail of these development components will be provided with any forthcoming planning application.

It is proposed that the two turbines will be erected at the following approximate grid references in fields above Esgairliving Farm (also detailed in Appendix 1, Figure 2). Note: these locations are the same as the previous planning applications on the Site.

Turbine Number	Easting	Northing
T1	256960	241001
T2	256950	241248

The development would be temporary with a proposed operational life of 25 years, after which the Site would be decommissioned and the equipment removed. A programme of restoration would be expected to be agreed with the Council by condition.

The Proposed Development is considered a Major Development under The Town and Country Planning (Development Management Procedure) (Wales) Order 2012, as the development is carried out on a site greater than 1 hectare.

The EIA Regulations

The EIA Regulations set out thresholds for Schedule 1 developments for which Environmental Impact Assessment (EIA) is mandatory and Schedule 2 development for which an EIA may be required. The Proposed Development does not fall within any of the developments listed in Schedule 1, but falls within Section 3(i) of Schedule 2, i.e. Installations for the harnessing of wind power for energy production (wind farms) and exceeds the applicable threshold that the hub height of any turbine or height of any other structure exceeds 15 metres.

Schedule 2 development proposals require an EIA if they are considered likely to have significant effects on the environment, by virtue of factors such as nature, size or location. Schedule 3 of the EIA Regulations provides selection criteria for screening Schedule 2 developments, namely: the characteristics of the development; the environmental sensitivity of the location; and the types and characteristics of the potential impacts (e.g. its magnitude and duration). These selection criteria are considered individually for the Proposed Development below.

Regulation 4(2) sets out that where an EIA is required it must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors:

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape; and
- (e) the interaction between the factors referred to in paragraphs (a) to (d).

Schedule 3 Selection Criteria for Screening Schedule 2 Development

Characteristics of Development

Schedule 3 of the EIA Regulations provides the characteristics of development that must be considered, with particular regard to the following:

Characteristics of Development	Description in relation to the Proposed Development
The size and design of the whole development	Commercial Scale wind turbines are large in their own right, and as a result they will inevitably have certain landscape and visual impacts. However, Environmental Impacts associated with such developments are generally very well understood and limited in their extent where development consists of a single or small cluster of wind turbines. The Proposed Development has a small development footprint of approximately 6.4 hectares and a relatively small generating capacity in the region of 5MW. This generating capacity is in line with Welsh Government policy in exploring suitable sites for developments not exceeding 5MW outside the boundary of the Strategic Search Areas (SSAs). It is also of some relevance that the Proposed Development sits on the fringes of a SSA for wind (SSA G) (see Appendix 1, Figure 3 – SSA). Furthermore, the Welsh Government commissioned a study in 2019 to assess large scale (10MW+) onshore wind and solar energy development constraints and opportunities in Wales. The objectives of the study were to assist in identifying the most appropriate locations for large on-shore wind and solar energy development to inform the preparation of an Energy Atlas and the National Development Framework (NDF). 15 areas were identified across Wales. The Proposed Development is located on the fringes of a priority area for wind and solar (number 11³).
Cumulation with other existing	The nearest operating large-scale wind farms are

³ <https://gov.wales/sites/default/files/publications/2019-08/priority-areas-for-solar-and-wind-energy-executive-summary-stage-1-and-2.pdf> (Last Accessed: 02/10/20)

development and/or approved development	Brechfa West Wind Farm (28 turbines), situated approximately 9.5km south west of the Proposed Development and Alltwalis Wind Farm (10 turbines), situated approximately 12km south west of the Proposed Development. There are also a number of approved or operational smaller schemes (1 or 2 turbines) in the area, the closest of which is 1.4km away. The Applicant is also aware of the Brechfa North wind farm (9 turbines), situated 5.7km south west of the Proposed Development, that received a Scoping Direction in September 2016, however due to no further information being provided since then, we assume this project to be abandoned. Cumulative impacts will be required to be assessed in any forthcoming application. However in this case, due to the limited number of turbines proposed and the Applicant's understanding of the baseline position (discussed later in this Screening Request), cumulative impacts would not be expected to cause any environmental impact of a scale that, in itself or in combination with the other considerations, would result in any significant cumulative effects.
The use of natural resources	The construction process would require the use of limited natural resources. Manufacture of the component parts (e.g. turbine blades) would also require the use of some natural resources. However, there would be no excessive or unusual use of natural resources. During the operational phase, the Proposed Development would have a positive impact in this respect, as it would utilise a sustainable wind resource. By providing electricity generation from a sustainable source, the development positively contributes to decreasing the reliance upon finite fossil fuels, as well as wider government and global targets for the reduction of carbon dioxide (CO₂) emissions. Additional urgency has been established over the past two years in this regard, with a number of high-profile environmental reports being published from the

	Committee on Climate Change (CCC)⁴ and others, as well as 'Climate Emergencies' being declared by the UK and devolved governments. Very minimal natural resources would be required for maintenance during the operational phase, primarily fuel for visiting the site.
The production of waste	During the construction phase, typical construction waste would be generated, but the level of this would be low given the scale and nature of the works and would be handled in accordance with appropriate licenses and procedures. Minimal waste materials would be generated during the operational period. On decommissioning, the majority of materials removed from the site could be re-used or recycled.
Pollution and nuisances	The construction phase would require the temporary storage of fuels and vehicle maintenance materials. These would be stored and used in accordance with construction best practice methodology to minimise the risks to the soil and also to surrounding watercourses, waterbodies and groundwater. As detailed above, electricity generation from sustainable sources has the indirect advantage of reducing the reliance on fossil fuels and associated environmental pollution/CO₂ emissions. In addition, no hazardous or toxic materials would be stored on site during the operational phase of the development. Wind turbines, either individually, as larger groups or micro-turbines, generate noise from two distinct sources; mechanical noise from the generator and gearbox and aerodynamic noise from the turbine blades as they move through the air. Modern designs have reduced the mechanical noise so that it is now generally less than or at a similar level to the aerodynamic noise. Due to the low number of turbines proposed and distance away from nearby residential receptors noise

⁴ <https://www.theccc.org.uk/publications/> (Last Accessed: 30/09/20)

	impacts are considered to be low. In addition, due to the location of the Proposed Development to other wind turbines the noise impacts when considered in a cumulative context are also considered to be low.
The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge	There would be potential for accidents during the construction phase of the development, however this relates to the normal risks associated with construction and would be managed in an appropriate way by the lead engineering contractor and designer commissioned to install the Proposed Development under the Construction, Design and Management Regulations. During the operational phase of the development the wind farm would be unmanned. Visits to the Site would be infrequent and for the purposes of maintenance. There is the potential for accidents to occur during these processes, however they would be managed by use of good commercial and health and safety practices. No unusual substances and technologies particular to the Proposed Development would be likely to bring about accidents. According to the NRW Tan 15 Development and Flood Risk map, the Site is located within Zone A; this zone is considered to be at little or no risk of fluvial or tidal/coastal flooding. The British Geological Survey (BGS) Groundwater Flooding Hazard map indicates that the susceptibility to groundwater flooding across large areas of the Site is negligible. However, areas adjacent to HW1, HW2 and Afon Melinddwr are shown to have a low to significant susceptibility to flooding from this source. The NRW Risk of Flooding from Surface Water map indicates that the Site has a very low probability of experiencing surface water flooding within the vicinity of the proposed T1 and T2. Areas adjacent to HW1, HW2 and Afon Melinddwr, however, are indicated to be at a high risk of flooding from this source. There are no canals within the vicinity of the Site and the EA Risk of Flooding from Reservoirs Map indicates the Site is at negligible risk of flooding from such sources. The SFCA, Preliminary Flood Risk Assessment (CCC, May 2011),

	DCWW and CCC do not hold any records of historical flood events at the Site. When considering the probability of flooding from any of the aforementioned sources, the risks of major accident and/or disaster, including those caused by climate change are considered to be low.
The risks to human health (for example, due to water contamination or air pollution)	During the construction phase there is potential for fuels and chemicals to spill, however this risk would be suitably managed in an appropriate way by the lead engineering contractor and designer under the Construction, Design and Management Regulations. Similarly, appropriate management methods would be used during the decommissioning phase also. During the operational phase, the Proposed Development would pose very low risk to human health.

Location of Development

Schedule 3 of the EIA Regulations provides that the environmental sensitivity of geographical areas likely to be affected by the development must be considered, with particular regard to the following:

The existing and approved land use	The existing land use on the Site is predominantly agricultural (mostly rough pasture) with a range of small to large sized fields, bound by a mixture of stone walls, post and wire fences, or hedgerows and trees. The use of the land for wind energy would not give rise to any significant detrimental impact. It is also of some relevance that the Proposed Development sits on the fringes of a SSA for wind (SSA G).
The relative abundance, availability quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	The Proposed Development would take approximately 0.95 ha of agricultural land (mostly rough pasture) out of production for the 25 years that would constitute the lifetime of the development. However, it should be noted that as the Proposed Development would be for a temporary period and the area would be restored in accordance with an approved method statement. In the experience of the Applicant the components such as the site compound base, turbine foundations and access tracks in some cases are left in place for agricultural use, depending on the preference of the landowner or upon any planning condition attached to the permission.
The absorption capacity of the natural environment, paying particular attention to the following areas: • wetlands, riparian areas, river mouths; • coastal zones and the marine environment; • mountain and forest areas; • nature reserves and parks; • European sites and other areas classified or protected under national legislation; • areas in which there has already been a failure to meet the	Wetlands, riparian areas, river mouths, Coastal zones and the marine environment The Afon Marlais issues from the hillside approximately 600m north-north-east of the Proposed Development at its closest point and heads south-east. Nant y Wenallt is located approximately 600m east-south-east of the Proposed Development at its closest point and heads south/south-east feeding into the Afon Marlais, approximately 2km south-east. There are a few small water bodies scattered around the Proposed Development; the closest is an old sheep dip, 560m north-east and three small ponds located 920m to the south-east.

environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; • densely populated areas; • landscapes and sites of historical, cultural or archaeological significance.	The Afon Teifi is located approximately 5.2km north-west of the Proposed Development at its closest point, the Afon Aeron is located 15km north of the Proposed Development at its closest point, and the Afon Tywi is located approximately 18.5km south-east of the Proposed Development at its closest point. There are numerous small water bodies within the wider area, a small pond lies 1km north-west of the Proposed Development and the lake of Llyn Pencarreg lies 5.3km north-north-west of the Proposed Development. The nearest RAMSAR designated wetland is located approximately 23km north of the Proposed Development. The nearest coastal area is approximately 25 km to the west. Due to the nature of the Proposed Development and the distance to receptors, impacts to the surrounding wetlands, riparian areas, river mouths, Coastal zones and the marine environment are considered low in relation to the Proposed Development. Mountain and forest areas To the southeast of the Proposed Development, ground levels progressively increase, as the landform starts to rise, forming 'The Black Mountain' area of the Brecon Beacons National Park. To the north-east of the Proposed Development, the area is heavily influenced by forest/woodland located on the large ridge line formed between the Afon Teifi and Afon Tywi. The Proposed Development is located on the north-east edge of Brechfa Forest, the forest covers an area of approximately 6500ha and is a mixture of ancient forest and managed woodlands. Other large areas of woodland tend to be located along high ground to the north-east of the site, such as Cao
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	Forest, Allt Bryn-teg, Blaen Rhisglog Plantation and Clywedog Plantation located approximately 10.5km to the north-east of the Proposed Development. A smaller block of woodland, covering 118ha is located north-east of the turbines along the ridge of Mynydd Pencarreg, 2km from the Proposed Development. Due to the nature of the Proposed Development and the distance to receptors, impacts to surrounding mountain and forested areas are considered low in relation to the Proposed Development. European sites and other areas classified or protected under national legislation and National reserves and parks There are no European, National or Local landscape, cultural heritage or ecological designations within the Site boundary or within 500m of the Site. The nearest designation is Cefn Blaenau Site of Special Scientific Interest (SSSI) which lies approximately 700m to the north-east of the Proposed Development. This SSSI is a small upland valley which supports a mosaic of habitats such as small wet flushes, valley mires and 'ffridd' (usually a mixture of Bracken, Gorse and Hawthorn). There are only three other ecological designations found within 5km of the Proposed Development (see Appendix 1 – Figure 4). These are: • Caeau Blaen-Bydernyn (SSSI), approximately 2.5km to the north-west which is designated for its wet grassland and species-rich acid grassland and supports Marsh Fritillary, Small Pearl-bordered Fritillary butterflies and Scarlet Tiger-moth; • Cae Blaen-Dyffryn (SSSI), 4.4km to the north-east which is an exceptionally rich botanical site (also managed as a Plantlife Reserve). It supports both Greater and Lesser Butterfly-orchids, Moonwort, Mountain Pansy and a range of other declining and local species; and • Afon Teifi (SSSI and Special Area of
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	Conservation (SAC)), approximately 4.9km to the north. This is also designated as a Special Area of Conservation (SAC). Special Landscape Areas (SLAs) are considered to be attractive and locally significant landscapes that are worthy of protection under planning policy. Within 25km of the Proposed Development there are six SLA's: • Mynydd Mallaen; • Teifi Valley; • Tywi Valley; • The North Eastern Uplands; • Llanllwni Mountain; and • Cothi Valley. The closest SLA is the Llanllwni Mountain SLA 2.7km to the west. In line with Natural Resources Wales (NRW) LANDMAP Guidance Note 3 (2013), and as part of the 2015 Environmental Report, 6 LCAs were previously identified within 15km of the Site. The turbines themselves are located within LCA 1: Brechfa Forest, Mynydd Mallaen, Llanllwni and Tre baddau Upland and Plateau. The LANDMAP value of each identified LCA is categorised below: <u>High LANDMAP Value</u> • Brechfa Forest, Mynydd Mallaen, Llanllwni and Tre baddau Upland and Plateau; • Cothi and Llansawel Lowland Valleys; and • Mynydd Figyn, Llansawel and Banc-Beli-Tew Upland. <u>Moderate to High LANDMAP Value</u> • Teifi, Llanwenog and Dyffryn Lowland Valley; • Llanwenog Farmland and Talgarreg Plateau; and • Caio Hills. The Brecon Beacons National Park (BBNP) is located approximately 18.5km south-east of the Proposed Development. The National Park was established in 1957 and is a valued and protected area managed
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	mainly for landscape conservation, natural heritage and recreation. The park covers a 1,344km² area, It stretches from Llandeilo in the west to Hay-on-Wye in the northeast and Pontypool in the southeast, encompassing four main regions - the Black Mountain in the west, Fforest Fawr and the Brecon Beacons in the centre and the Black Mountains in the east. The landscape predominantly consists of bare, grassy moorland, with scattered forestry plantations, and pasture in the valleys. It is known for its remote reservoirs, waterfalls and its caves. There are a number of Open Access and Common Land areas of various sizes within 25km of the Proposed Development. The majority of these areas are located on higher ground, along the ridge line formed by the Afon Teifi and Afon Tywi. The nearest Open Access and Common Land areas are located to the west of the Proposed Development at approximately 1km, which is comprised of areas of Brechfa Forest and the uplands area of Mynydd Llanllwni. Due to the nature of the Proposed Development and the distance to receptors, impacts to European sites and other areas classified or protected under national legislation and National reserves and parks are not considered to be unacceptably harmful in relation to the Proposed Development. Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure The Applicant is not aware of any areas relevant to the Proposed Development where there has already been a failure to meet the environmental quality standards laid down in EU legislation. Densely populated areas The Site is located in a lowly populated area of Carmarthenshire, north of the village of Rhydcymerau,
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	the edge of which is approximately 2.2km from the nearest proposed turbine, 2km west of Wren, 5.5km south-west of Llanybydder and 6.5km south of Lampeter. Outside of these settlements there are other smaller village clusters and farmsteads at varying distances from the Site. Landscapes and sites of Historical, cultural or archaeological significance The Register of Landscape of Outstanding Historic Interest (LOHI) in Wales and Register of Landscapes of Special Historic Interest (LSHI) in Wales has been established by Cadw/International Council on Monuments & Sites (ICOMOS) UK to identify those landscape that can be considered of importance within Wales based upon a clear set of criteria. There are nine Registered Landscapes of Outstanding/Special Historic Interest that lie entirely or partly within 25km of the Site (see Appendix 1 – Figure 5): • Upland Ceredigion; • Elan Valley; • Black Mountain and Mynydd Myddfai; • Tywi Valley; • Dolaucothi; • Drefach and Felindre; • Lower Teifi Valley; • Taf and Tywi Estuary; and • Preseli. The closest LOHI is Dolaucothi, located approximately 7.4km east of the Site. The Register of Parks and Gardens of Special Historic Interest in Wales has been established, by Cadw/ICOMOS UK, to identify those sites that can be considered of importance within Wales based upon a clear set of criteria. There are a total of 19 Registered Parks and Gardens within 25km of the Site. A considerable number of the gardens are not open to the public and these would not be considered as part of any future assessment. The sites that are open to the public are listed below:
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	• Llanerchaeron - Grade I, II and II* buildings within 30 ha of landscaped parkland. Located 20.5km north-west of the proposed turbines. • Ty Glyn - Kitchen garden. Located 19.9km north-west of the proposed turbines. • Plas Dinefwr (also known as Dynevor Castle) - Grade I, II and II* buildings within 200 ha of landscaped parkland. • Aberglasney - Grade II and II* buildings within 6 ha of landscaped parkland. Located 19.1km south of the proposed turbines. • Golden Grove, Dryslwyn (also known as Gelli Aur) - Grade II and II* buildings within 4 ha of gardens. Located 21.5km south of the proposed turbines. • Paxton's Tower - Grade II and II* buildings within 5 ha of gardens. Located 22.8km south of the proposed turbines. • National Botanic Garden of Wales (also known as Middleton Hall) - Grade II and II* buildings within 243 ha of landscaped parkland. Located 23.5km south-south-west of the proposed turbines. • Bishop's Palace, Abergwili - Ornamental garden. Located 24km south-southwest of the proposed turbines. [Note: The register is due to be updated in 2020] There are a number of Scheduled Ancient Monuments (SAMs) within 5km of the Site. The nearest SAM is 'Crug Y Bwdran', located approximately 1.45km south-west of the Site, located on the southern edge of the Banc Melyn area of Brechfa Forest (see Appendix 1 – Figure 6). This is a Bronze Age Religious, Ritual and Funerary round barrow and cairn. There are eight Grade II listed buildings within 5km of the Site, the closest of which is Gelli Uchaf located approximately 600m south of the Site (see Appendix 1 – Figure 6).
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	No known non-designated archaeological heritage assets have been identified as likely to suffer an impact from the Proposed Development. A potential for as yet unknown archaeological remains to survive within the Site has been identified. This effect could be mitigated by a programme of archaeological works, for example a watching brief, implemented during the construction phase of the development. Due to the nature of the Proposed Development and the distance to receptors, both direct and indirect impacts to Landscapes and sites of Historical, cultural or archaeological significance are not considered to be unacceptably harmful in relation to the Proposed Development.
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Types and Characteristics of the Potential Impact

This section of the report provides further assessment of the potential for the Proposed Development to give rise to likely significant effects on the factors specified in regulation 4(2) of the EIA Regulations. This potential has been evaluated giving due consideration to the criteria set out in Schedule 3, Paragraph 3 of the EIA Regulations as appropriate, namely: the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); the nature of the impact; the transboundary nature of the impact; the intensity and complexity of the impact; the probability of the impact; the expected onset, duration, frequency and reversibility of the impact; the cumulation of the impact with the impact of other existing and/or approved development; and the possibility of effectively reducing the impact. The table below sets out the known environmental sensitivities identified in a preliminary/baseline appraisal (including relevant environmental information from historic planning applications related to the Site) and details the potential for significant environmental effects associated with the Proposed Development.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
Population and Human Health	The requirement for consideration of health was introduced into the EIA regulations in 2017 and is interpreted as the need to consider impacts on human health in the population and on healthcare resources. The first of these is largely through the consideration of humans as receptors to the impacts on air quality, noise, visual amenity, ground contamination etc. The second is whether the Proposed development would impact on the availability of services. As these elements were only introduced as part of the 2017 EIA regulations there was not a specified section for population and human health within the previously submitted environmental information for the Site. However, potential effects of wind turbines towards aspects of human health, such as noise, visual amenity and turbine safety were all covered in the previous environmental information that supported the Original Planning Application and the Variation Application. Details and conclusions of which are detailed below: Noise	Noise In addition to the Environmental Report submitted with the original planning application in 2015, following the Noise Impact Assessment that accompanied the planning application for the 25m tip height increase submitted in 2016, the potential effects of the Proposed Development (with a tip height of also 125m) are well understood and no significant alterations to previous conclusions are predicted, neither is the introduction of any new significant effects. As such, no significant effects are predicted. The Applicant shall prepare a noise section, incorporating any changes in the baseline and cumulative context, as part of a wider Environmental Report in support of a future

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	A section on noise was included in the Environmental Report submitted with the Original Planning Application, which used the guidance contained within ETSU-R-97 to assess the potential noise impact of the development. Predictions of wind turbine noise were been made, based upon a sound power level for an Enercon E70 2.3 MW. A calculation procedure which is considered to give realistic estimates of noise imission levels was followed. An assessment of the potential cumulative noise impact with the existing single turbine at Till Hill, the proposed turbine south west of Bryn Dafydd and the consented wind farm at Brechfa Forest East was undertaken. When considering the proposed wind turbines in isolation, predicted levels did not exceed a level of 35 dB LA90 at any non-associated dwelling, except for Caermalwas Fawr. A background noise survey was performed at this location in order to determine the potential effects of the development. Noise levels were not predicted to exceed the derived noise limits for Caermalwas Fawr. Therefore, the wind turbines were considered acceptable in isolation. When considering the development with the existing single turbine at Till Hill and the proposed turbine south west of Bryn Dafydd, there was no cumulative issue.	planning application to consider any change of significance in the potential effects previously identified. Details of mitigation would be included, if needed. Shadow Flicker The increase of 25m tip height associated with the Proposed Development is not likely to significantly alter the conclusions of the previous Environmental Report for the 100m development or introduce any new significant effects. As such, no significant effects are predicted. The Applicant shall prepare an updated shadow flicker assessment, as part of a wider Environmental Report in support of a future planning application, to identify the extent of any additional flicker effects on receptors. The management of shadow flicker could be controlled through the appropriate use of

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	When considering the development cumulatively with the consented Brechfa Forest East Wind Farm, total cumulative noise levels were not predicted to exceed the derived noise limits for Caermalwas Fawr or a level of 35 dB L_{A90} at any other non-associated dwelling. Therefore, it was considered that the development was acceptable with respect to cumulative noise. A noise impact assessment was also prepared in support of the Variation Application, ETSU-R-97 again was used to assess the potential noise impact of the increased tip height development. Predictions of wind turbine noise were made, based upon a sound power level of a different candidate turbine (Senvion MM100). Concluded from the noise impact assessment was that, the wind turbines were considered acceptable in isolation and when considering the increased tip height development with the existing single turbine at Till Hill and the proposed turbine south west of Bryn Dafydd, there was no cumulative issue. Furthermore, when considering the proposed wind turbines cumulatively with the consented Brechfa Forest East Wind Farm, total cumulative noise levels were not predicted to exceed a level of 35 dB L_{A90} at a wind speed of 10 $m.s^{-1}$ at Caermalwas Fawr. Therefore, it was considered that the increased tip height development was acceptable with respect to cumulative noise. Shadow Flicker	planning conditions. Ground Contamination The increase of 25m tip height associated with the Proposed Development is not likely to significantly increase possible ground contamination or introduce any new significant effects. As such, following appropriate mitigation measures no significant effects are predicted. Air Quality The increase of 25m tip height associated with the Proposed Development is not likely to significantly increase air quality impacts or introduce any new significant effects previously identified for the 100m development. As such, following appropriate mitigation measures no significant effects are predicted.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	A section on Shadow Flicker was included in the Environmental Report submitted with the original Planning Application in 2015, which assessed using a specialised computer package called Windpro the maximum number of hours in the year when shadows may theoretically be cast from the wind turbines towards dwellings within a designated study area. The study area was defined as 710m (10 x rotor diameter) from the wind turbines within 130 degrees either side of north, relative to the wind turbine locations. Two dwellings were identified within these parameters: Esgairliving and Tanrhiw. The assessment concluded that neither of the two dwellings identified are predicted to experience shadow flicker. Ground Contamination The construction phase of the Proposed Development has the potential to affect the quality of either surface or groundwater bodies through the mobilisation of contaminants and sediments, and accidental spillages, and the creation of new pollutant pathways. However, this risk would be suitably managed in an appropriate way by the lead engineering contractor and designer under the Construction, Design and Management Regulations. Similarly, appropriate management methods would be used during the decommissioning phase.	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	No hazardous or toxic materials would be stored on site during the operational phase of the development. Air Quality Similarly to the above, air quality during the construction phase would be managed through appropriate construction management practices. The Proposed Development would generate only a very small amount of polluting emissions during the operational phase (mainly through maintenance vehicles visiting the Site). In addition, the production of renewable energy reduces the reliance on fossil fuels and their associated polluting emissions.	
Biodiversity	There are no European, National or Local ecological designations within the Site boundary or within 500m of the Site. The nearest designation is Cefn Blaenau SSSI which lies approximately 700m to the north-east of the Proposed Development. This SSSI is a small upland valley which supports a mosaic of habitats such as small wet flushes, valley mires and 'ffridd' (usually a mixture of Bracken, Gorse and Hawthorn).	The increase of 25m tip height associated with the Proposed Development is not likely to significantly alter the conclusions of the previous Environmental Report or introduce any new significant effects. As such, no significant effects are predicted.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	The only other ecological designations found within 5km of the Proposed Development are: • Caeau Blaen-Bydernyn, approximately 2.5km to the north-west which is designated for its wet grassland and species-rich acid grassland and supports Marsh Fritillary, Small Pearl-bordered Fritillary butterflies and Scarlet Tiger-moth; • Cae Blaen-Dyffryn, 4.4km to the north-east which is an exceptionally rich botanical site (also managed as a Plantlife Reserve). It supports both Greater and Lesser Butterfly-orchids, Moonwort, Mountain Pansy and a range of other declining and local species; and • Afon Teifi, approximately 4.9km to the north. This is also designated as a Special Area of Conservation (SAC). A section on Ecology and Nature Conservation was included in the Environmental Report submitted with the Original Planning Application in 2015, which included the following: • a review of the legislative context; • collection and compilation of existing ecological data; • an Extended Phase 1 Habitat Survey including protected species; • breeding bird surveys; • bat assessment; • water vole and otter surveys;	Updated habitat, protected species, bird and bat surveys would be carried out and incorporated into an ecology section as part of a wider Environmental Report which shall be prepared in support of a future planning application to consider any change of significance in the potential effects previously identified. The ecology report shall include details of mitigation and enhancement measures, if needed.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	• badger surveys; • red kite nest surveys; • Standalone tree survey; • an assessment of the site's ecological importance, including an analysis of the potential of the site to support protected species or species of conservation concern; • identification of potential impacts likely to have an adverse effect on the site's ecological value both in terms of the effect on individual species and habitats, and on the overall integrity of the site and its immediate surroundings; • recommendations to avoid potentially significant impacts where possible, or to minimise or mitigate impacts; • an assessment of the residual impacts on species and habitats and an assessment of the effect on the overall integrity of the site; and • proposed measures to enhance the ecological and nature conservation value of the site and surrounding area The possible impacts concluded from the 2015 Environmental Report were as follows: Designated Sites There are four designated sites within 5km of the proposal. The ecological	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	characteristics of these sites and their locations mean that there can be no possibility of impacts on them from the proposal. This is because all four have been designated for their vegetation and/or invertebrate communities. The small-scale nature of the development will not result in any impacts on these sites. Overall, impacts on designated sites are considered to be neutral (non-significant). Habitats Small areas of habitats will be removed for construction. In general, these habitats are of low (parish/neighbourhood) level of value. Small areas, such as the neutral grassland (TN3) are of higher (District value). The removal of these habitats would represent a major negative impact, since it would be long term. Therefore, combined with parish/neighbourhood level of value, overall impacts are within the range of minor – moderate (non-significant). Since the ecological value of the habitat at the site is so low, the removal of small areas of this habitat should be considered as a minor adverse impact (non-significant). Where habitats of District level value are removed, this would be considered as a more moderate impact but would be deemed as non-significant. No additional impacts are anticipated on habitats during the operational phase. Birds	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	The breeding bird assemblage at the site is considered to be poor to moderate and has been rated at a parish/neighbourhood level of value. However, if construction operations are carried out during the bird nesting season (March to August inclusive), it is considered that there is a low risk that ground-nesting or arboreal nesting birds could be harmed through the clearance of vegetation required to accommodate the turbines and their associated infrastructure or any pruning/felling of overhanging trees and shrubs required to facilitate access. It is considered highly unlikely that any species listed in Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) would be affected in this way (none were present at the site). Therefore, this represents a negative potential impact at a parish/neighbourhood level resulting in an overall minor negative impact; therefore, this is non-significant. Outside the bird breeding season, this impact would be reduced to negligible or neutral. A minor period of disturbance is likely to occur during the construction phase due to the noise of machinery. However, the low numbers of birds present onsite and, in particular, the absence of any Schedule 1 breeding birds close to the proposed turbine locations means that any disturbance effects will be very limited. Again, overall impacts are considered to be minor negative, therefore, this is non-significant. It is not anticipated that there will be any disturbance impacts on birds during	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	the operational phase. The general lack of breeding birds and the low levels of noise generated by an operational wind turbine of this size will not produce any disturbance impacts on breeding birds. Effects are considered to be neutral (non-significant). The site is not on a recognised migration route. No waders, waterfowl or other migrating species were recorded (aside from a very small number of Golden Plover on a single occasion). The Site appears to provide a relatively regular hunting or foraging habitat for Red Kite. It can therefore be stated with confidence that the numbers of these birds flying over the site or using it for foraging do not pose any serious risk of collision. Impacts are predicted as being negative, which combined with the District level of value, results in an overall minor negative impact (non-significant). Protected Species The almost total lack of protected species at the site (apart from the foraging by bats along the access track area) means that there will be no impact from construction on these species. There is some potential for very low numbers of common reptiles to be present (e.g. Common Lizard <i>Lacerta vivipara</i>). There is therefore a very slight potential for these species to be crushed by machinery. Impacts are considered to be negative, and therefore, combined with parish/neighbourhood level of value, overall impacts are minor (non-	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	significant). Potential impacts during the operational phase on protected species, include potential impacts on bats. Due to the altitude and open conditions of the site bats are only likely to forage there in ideal weather conditions. Moreover, the lack of good flight lines also militates against high bat usage. The low availability of roost sites associated with the site is also indicative of low bat usage. In addition, the turbines are positioned at greater than 50m in terms of blade sweep from the nearest boundaries and thus accord with Natural England TIN051. As a result, the risk of bat collision is very low. Effects are considered to be negative, which, combined with parish/neighbourhood level of value, results in an overall minor negative impact (non-significant).	
Land, soil, water, air and climate	The land use of the Site is predominately agricultural (mostly rough pasture). A section on Geology, Hydrology and Hydrogeology was included in the Environmental Report submitted with the original Planning Application in 2015, which presented information relating to surface water, groundwater and flood risk, covering both the construction and operational phases of the development. This assessment concluded the following: Flood Risk	The increase of 25m tip height associated with the Proposed Development is not likely to significantly alter the conclusions of the previous Environmental Report or introduce any new significant effects. The effects of climate change are also not considered to significantly alter the conclusions of the previous Environmental Report or introduce any new significant effects.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	According to the NRW Tan 15 Development and Flood Risk map, the Site is located within Zone A; this zone is considered to be at little or no risk of fluvial or tidal/coastal flooding. The British Geological Survey (BGS) Groundwater Flooding Hazard map indicates that the susceptibility to groundwater flooding across large areas of the Site is negligible. However, areas adjacent to HW1, HW2 and Afon Melinddwr are shown to have a low to significant susceptibility to flooding from this source. The NRW Risk of Flooding from Surface Water map indicates that the Site has a very low probability of experiencing surface water flooding within the vicinity of the proposed T1 and T2. Areas adjacent to HW1, HW2 and Afon Melinddwr, however, are indicated to be at a high risk of flooding from this source. There are no canals within the vicinity of the Site and the Environment Agency (EA) Risk of Flooding from Reservoirs Map indicates the Site is at negligible risk of flooding from such sources. The SFCA, Preliminary Flood Risk Assessment (CCC, May 2011), DCWW and CCC do not hold any records of historical flood events at the Site. As such, the development is not considered to be at significant risk of flooding from any source. Water Quality There are two watercourses (HW1 and HW2) within the same drainage catchment as the proposed location of the wind turbines and Afon Melinddwr nearby to the access point of the site. According to NRW, the site is also	As such, no significant effects are predicted. The Applicant shall prepare a geology and hydrology section, incorporating any changes in the baseline, as part of a wider Environmental Report in support of a future planning application to consider any change of significance in the potential effects previously identified. Details of mitigation measures would be included, if needed.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	underlain by a Secondary A and B bedrock aquifer. During the construction phase the development has the potential to affect the quality of either surface or groundwater bodies through the mobilisation of contaminants and sediments, and accidental spillages, and the creation of new pollutant pathways to the aquifer. However, these potential impacts would be mitigated by a range of operational, control and monitoring measures. These would significantly reduce the risks to the identified receptors and the residual significance of environmental impacts during the construction phase on the water environment is considered to be not significant. During operation of the site, impermeable areas at the site will marginally increase, and thus any increase in the rate and/or volumes of surface water runoff from the site will be negligible. Thus, the operational impact of the development on water resources is considered to be negligible and non-significant. Private Water Supply It is understood that one nearby property (Esgairliving) is supplied by a private water supply and that the supply pipe is within the vicinity of the proposed access track, although this has not been confirmed by any site investigations.	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	There is a risk that the private water supply serving Esgairliving may be ruptured during construction activities. However, following confirmation of the private water supply alignment prior to construction works relating to the access track and appropriate mitigation, this is expected to result in no significant effects.	
Material assets, cultural heritage and the landscape	Landscape and Visual A section on Landscape and Visual was included in the Environmental Report submitted with the Original Planning Application in 2015, which examined the likely effects of the development on landscape character and visual amenity within a 15km radius study area. Informal consultations with the local planning authority in addition to the application of acknowledged methodology for landscape and visual assessment, together established an appropriate scope for the landscape and visual assessment undertaken which was also applied cumulatively to other wind energy schemes, whether operational or consented within the study area. The assessment concluded the following: <i>Landscape Character</i> The site is located within LCA 1. Effects of the development on landscape character concluded that from within this character area effects would not be significant as the development would form a small component within the	Landscape and Visual Following both the Environmental Report in 2015 and the Landscape and Visual Issues Report that accompanied the planning application for the 25m tip height increase submitted in 2016, the potential effects of the Proposed Development are well understood and no significant alterations to previous conclusions are predicted, neither is the introduction of any new significant effects. The only significant potential effect identified was in the 2015 Environmental Report in respect of visual amenity from Viewpoint 1 when considering the two turbines of 100m both in isolation and cumulatively, however this did not impede the Council's decision to grant consent

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	landscape as a whole. The ZTV produced indicated that from the majority of this character area there would be no views of the turbines. The turbines are located within close proximity to the B4337 that transects the character area and influences it with its movement and associated noise and the communication masts on Mynydd Pencarreg and Mynydd Llanybyther, which are obvious vertical man made features within the landscape. The remaining character areas within the study area that are indicated to have views of the turbines by the ZTV were also assessed as experiencing no significant change to landscape character as a result of the turbines. <i>Visual Amenity</i> The ZTV produced indicated that at least one turbine would theoretically be visible from approximately 30% of the 15km study area, and therefore from the remaining 70% no wind turbines of the development would be visible. The majority of the views would be limited to areas of high ground, facing the turbines. As the distance increases away from the turbines, the ZTV indicated that views would reduce to smaller scattered areas of land. In reality, the coniferous plantation of the Brechfa Forest, located to the west and south-west of the site would offer a large degree of screening in views from the west, south-west and south.	at 100m. The Landscape and Visual Issues report that supported the 25m tip height variation then concluded that the proposed 25m tip height increase would not significantly increase the visual amenity impact that the approved 100m turbines had. Despite landscape and visual issues being some of the main issues considered as part of the Applicant's appeal following the Council's decision to refuse the 25m tip height variation, specifically because: - the landscape character of the site and surrounding area, particularly that of the Teifi Valley Special Landscape Area ("SLA"); and - the visual effect of the scheme, particularly on local residents and users of rights of way and publically accessible areas. The Minister's appointed Inspector concluded

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	Ten viewpoints were also assessed within the study area, which ranged from locations within close proximity to the site and more distant views. They also encompassed the BBNP, the Mynydd Llanllwni Special Landscape Area, the Landscape of Outstanding Historic Interest, and some of the surrounding distinctive uplands areas. Conclusions from these assessments were that the visual impacts of the turbines on visual amenity are likely to be greater within close proximity to the site. From viewpoint 1 the significance of effects resulting from the turbines was concluded to be significant. This was due to the turbines being in close proximity to the viewpoint (approximately 289m from Viewpoint 1 to the Site, representing the closest publicly accessible view of the turbines) and views being open where the turbines would become immediately apparent within the view. From more distant viewpoints, the visual impact of the turbines reduces as surrounding vegetation screens views and the turbines themselves become less readily discernible within the diverse and accommodating landscape. From within the study area, the surrounding undulating landform forms an impressive skyline, and views would continue to form the focal points of the views. <i>Cumulative Visual Assessment</i> A cumulative visual assessment was also carried out, which assessed a number of approved and submitted schemes within a 15km study area. It concluded	within their Appeal Decision that the increased size of the proposal would not harm the SLA or other landscape designations and that the increase in height proposed would not result in a significant adverse visual effect on local residents or users of publicly accessible areas. As such, apart from the exception of visual amenity effects from the location previously defined as Viewpoint 1 (approximately 289m from the Site and representing the closest publicly accessible view of the turbine), no significant effects are predicted. The Applicant shall prepare a landscape and visual section, incorporating any changes in the baseline (including LANDMAP values) and cumulative context (an updated version of 'Appendix 4.2 – Cumulative Wind Energy Developments within 15km Study Area' (which was provided with the Original Planning Application) has been provided in Appendix 2.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	that from the majority of the viewpoints assessed, cumulative impacts would be not significant. This is due to either cumulative schemes not being within view, the turbines likely to be imperceptible, or cumulative schemes within the view being visible but not dominating the view. Only one of the ten viewpoints was deemed to have significant cumulative effect, this is Viewpoint 1. This is the closest publicly accessible view (approximately 289m from Viewpoint 1 to the Site), with an open clear view towards the proposed turbines. Therefore, the cumulative effects are greater due to the proximity and clear visibility of the turbines dominating both the close and distant view. Overall, the profile, context and character of the site and the surrounding landscape lend itself to a two turbine scheme of the form and scale specified. Taking all of the above points into consideration, the site represents an opportunity to accommodate the development without unacceptable change to landscape character and visual amenity experienced within the surrounding landscape and associated communities, whether in isolation or cumulatively with other wind energy schemes in the study area. <i>Residential Visual Amenity</i> Of the five residential properties that lie within the 1km study area, all are assessed as not experiencing changes in visual amenity considered to be	This provides an up to date planning position on projects that were previously identified, in addition it includes projects that have entered the planning system since the original version). The landscape and visual section will be part of a wider Environmental Report in support of a future planning application to consider any change of significance in the potential effects previously identified. No new significant effects are predicted. Details of mitigation measures would be included, if needed. Cultural Heritage Following the 2015 Environmental Report, as well as the consultation responses received from Cadw and Dyfed Archaeological Trust following the Variation Application, the potential effects of the Proposed Development are well understood and no significant alterations to previous conclusions are predicted, neither is the introduction of any

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	unacceptable or adversely affecting living conditions. Of the three considered to experience a level of effect (Cefnblaenau, Carmalwas Fawr and Caemalwas Fach), one property (Carmalwas Fawr) has their main dwelling orientated away from the proposed turbines where views would remain unaltered, but their access and bedroom window to the rear of the property is orientated towards the turbines and of the two properties that have their main dwelling orientated towards the turbines, intervening vegetation will heavily screen any potential views. Consequently, magnitude of change in all cases was registered as no more than 'medium to low', not significant. The undulating, small valleys and dense vegetation within in the vicinity of the turbines and properties is a significant mitigating element of the local landscape in limiting the effect on residential property, partially screening views of the turbines, mitigating the visual amenity effects on living conditions. Specific locational characteristics, in particular the orientation of dwellings away from the turbines, along with the local mitigating effects of local landform and vegetation in ensuring that the turbines are at least partially screened from view, makes the overall conclusions on the visual amenity effects on living conditions an acceptable balance. <i>Statutory and Non-Statutory Designations</i>	new significant effects. Through the consultation process' Cadw did consider that the proposal would have a slight impact on the settings of three scheduled monuments (Three Round Cairns SE of Blaen Carreg (CM084); Pen Lan round barrow cemetery (CM313); and Gelli Dewi Uchar linear round barrow cemetery (CM315); and a very slight impact on the setting of one additional scheduled monument (Pen y Gaer Hillfort (CM101)). These low impacts were considered as part of the Appeal Decision. The Applicant's heritage consultant did not consider these significant or harmful and the Inspector only weighed these against the proposal to a minor degree. As such, no significant effects are predicted. The Applicant shall prepare a cultural heritage section, incorporating any changes in the

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	At its nearest point the BBNP is located approximately 19.5km south-south-east of the development. The ZTV and viewpoint assessments from within the BBNP concluded that effects on visual amenity would be limited as the turbines would not be obviously discernible within the panoramic landscape comprised of undulating hills, plateaus and river valleys. There are also limited locations where the turbines would be viewed against the backdrop of the SNP in the distance. The nearest SLA is Llanllwni Mountain, 2.6km west of the turbines at its closest point. Intervening surface features, including tree cover within Brechfa Forest, is expected to restrict potential effects on this landscape within the ZTV. The defining landscape qualities of the SLA are not likely to be eroded as a result of the development. As a result, landscape and visual effects are not predicted to be significant. Views of the turbines are limited to areas of high ground facing the site in the Dolaucothi LOHI. Due to intervening surface features potential effects are not predicted to be significant. There are no Registered Park and Gardens open to the public within 15km of the turbines.	baseline and cumulative context, as part of a wider Environmental Report in support of a future planning application to consider any change of significance in the potential effects previously identified. No new significant effects are predicted. Details of mitigation would be included, if needed.

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	Within the 15km study area there are a number of SAMs with two being located within 2km of the turbines. However, a large proportion of the SAMs within the study area fall outside of the ZTV. SAMs that fall within the ZTV tend to be located at a distance that enables the turbines to be viewed in context with the nearby communication masts and surrounding open and undulating landform. Viewpoint 9 was assessed from Crugiau Giar, which concluded that the impact on visual amenity resulting from the turbines would not be significant. Further to the above, as part of the planning application submitted in 2016 to vary the tip height of the turbines to 125m (the same as the Proposed Development), a Landscape and Visual Issues Report was prepared which concluded the following: • Incremental effects caused by increasing the height of the approved turbines by 25m would primarily be caused by the resulting higher blades of the turbines. Proportionally the two schemes are of similar proportions. Additionally, the larger sized blade results in a slower rotation, slightly reducing the overall effects caused by the introduction of the approved moving scheme to available static views. • Impacts assessed for the approved 100m turbine scheme on landscape	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	character would remain the same for the 125m scheme. Incremental effects caused by increasing the height of the approved turbines by 25m would be no greater than minor – not significant. • Impacts assessed for the approved 100m turbine scheme on the Teifi Valley SLA would remain the same for the 125m scheme. Incremental effects caused by increasing the height of the approved turbines by 25m would be no greater than minor – not significant. • Impacts assessed for the approved 100m turbines on visual amenity would also remain the same for the 125m scheme with no greater than minor – not significant incremental effect. • Although three additional residential properties would be included in the residential visual amenity assessment, incremental effects would be no greater than minor- not significant on all assessed properties. • Overall, it was concluded that incremental effects on landscape character and visual amenity would not be significantly affected by increasing the height of the approved turbines by 25m to 125m. Cultural Heritage A section on Historic Environment was included in the Environmental Report submitted with the Original Planning Application in 2015, which included an assessment of both direct physical impacts and indirect impacts on settings.	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	This assessment concluded that: <i>Non-designated archaeological assets</i> No known non-designated archaeological heritage assets have been identified as likely to suffer an impact from the development. A potential for as yet unknown archaeological remains to survive within the application site has been identified. This is considered to be moderate potential for remains from the Bronze Age, which may be of regional significance at most, and thus of Low to Medium sensitivity to change at most. A potential effect on the significance of any buried assets has been identified as of major to moderate magnitude, which would result in a negligible to moderate significance of effect. This effect could be mitigated by a programme of archaeological works, for example a watching brief, implemented during the construction phase of the development. This would have the effect of reducing the significance of effect on any buried remains to negligible. <i>Designated heritage assets</i> Designated assets in the form of listed buildings and scheduled monuments	

Environmental Factor	Baseline Findings/Previous Environmental Information	Potential for Significant Environmental Effects
	have been identified which may be subject to potential impacts. No direct physical impact on any designated heritage assets would arise from the development. The potential for indirect impacts on the settings of designated assets has been assessed, and no more than a negligible effect on the significance of any designated heritage assets has been identified during either the construction or operational phases of the development. No mitigation is required to reduce effects on designated assets. <i>All heritage assets</i> The residual effects on all heritage assets will be no more than of negligible significance. The overall effect of the development on the historic environment is not considered to be significant.	

Summary

The above tables consider that the Proposed Development does not have the potential to result in potentially significant environmental effects. This coupled with the fact that the Proposed Development is similar to the Varied Development, which was considered non-EIA as part of the Appeal Decision by the Welsh Ministers, we propose that an Environmental Impact Assessment is not required for the Proposed Development.

However, it is recognised that in the case of some environmental topics there is a need for technical assessments to be provided. Therefore, we propose to submit an Environmental Report with a future planning application, which would include the following detail:

- Introduction to the Project;
- Relevant Planning Policy;
- Project/Design Description;
- Landscape and Visual Assessment;
- Historic Environment Assessment;
- Ecology Assessment;
- Noise Assessment;
- Shadow Flicker Analysis;
- Transport and Access Assessment;
- Geology, Hydrology and Hydrogeology Assessment;
- Socio-economics, Tourism and Recreation Assessment; and
- Infrastructure and Safety Assessment.

The Environmental Report would also be supported by appropriate Figures and Appendices.

In addition to the Environmental Report, the planning application would be supported by the following documents:

- Covering Letter;
- Planning Application Forms;
- Planning Statement;
- Design and Access Statement; and
- Pre-application Consultation Report.

Next Steps

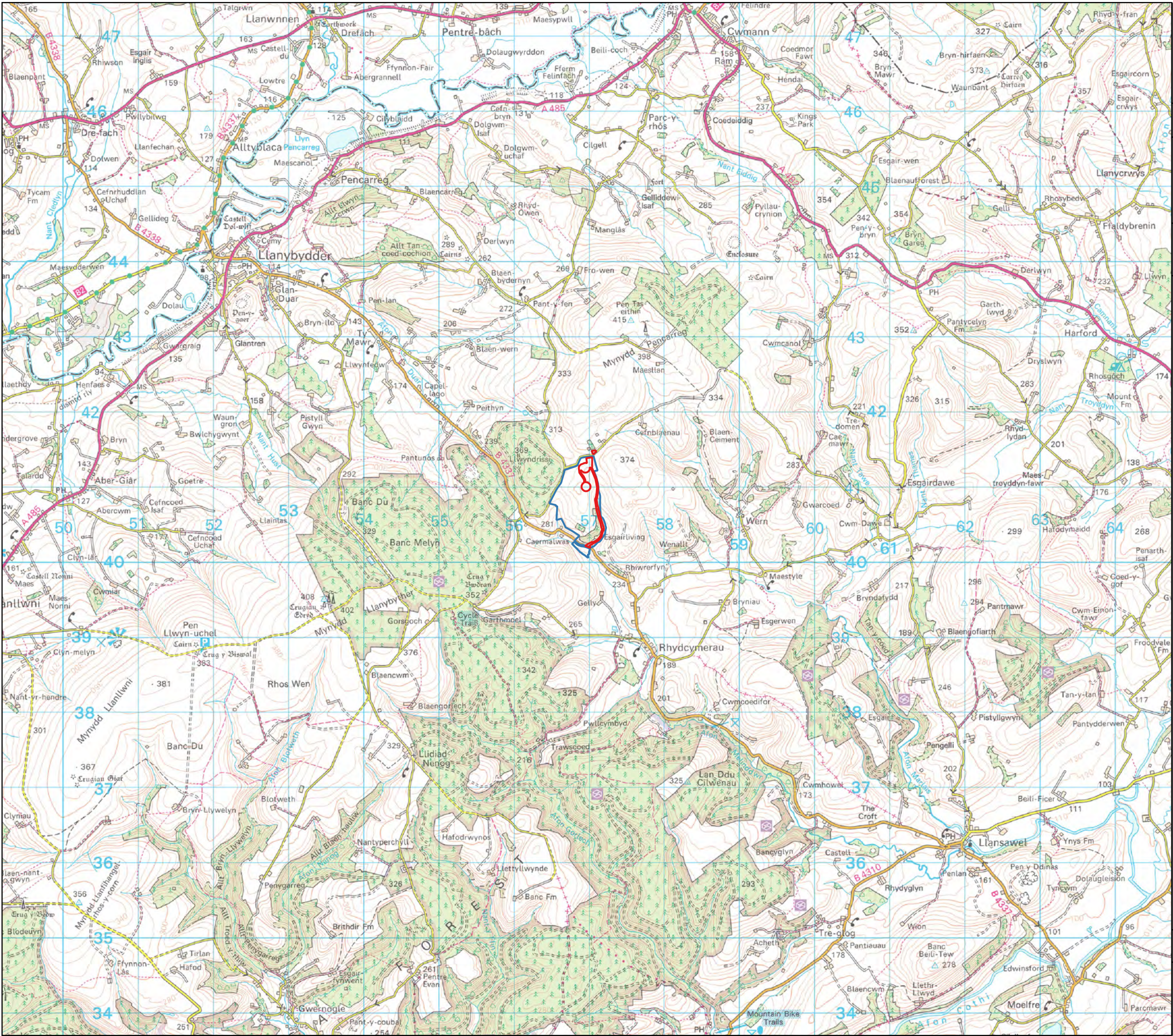
I trust this is satisfactory and look forward to receiving the Council's Screening Opinion in due course. If you would like any additional information or wish to discuss things further then please do not hesitate to contact me.

Yours faithfully,



Fred Brown
Energiekontor UK

Appendix 1 – Figures

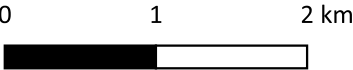


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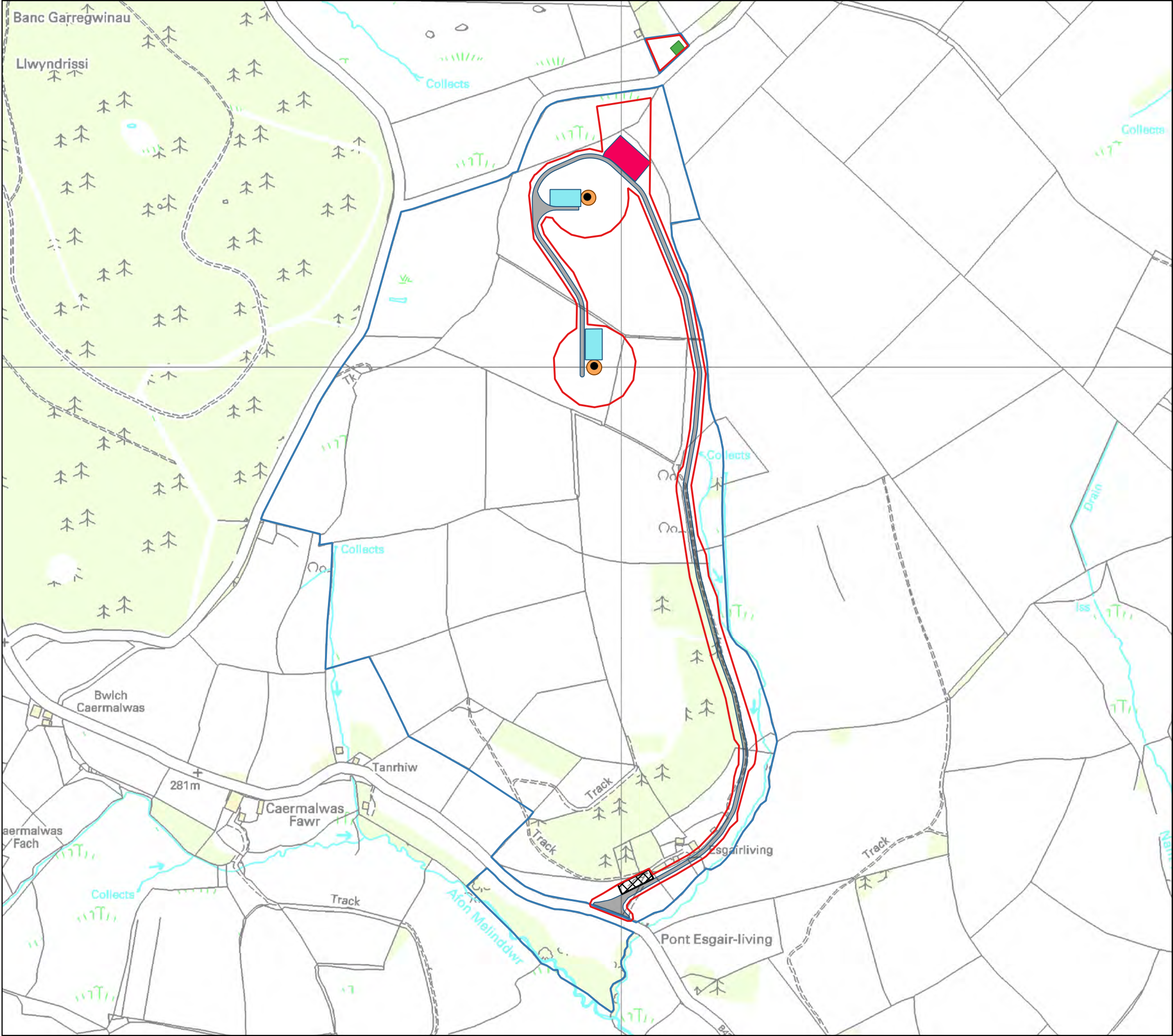
Figure 1: Site Location

- Key:**
- Site Boundary
 - Land Under Control of the Applicant



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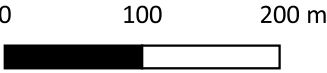


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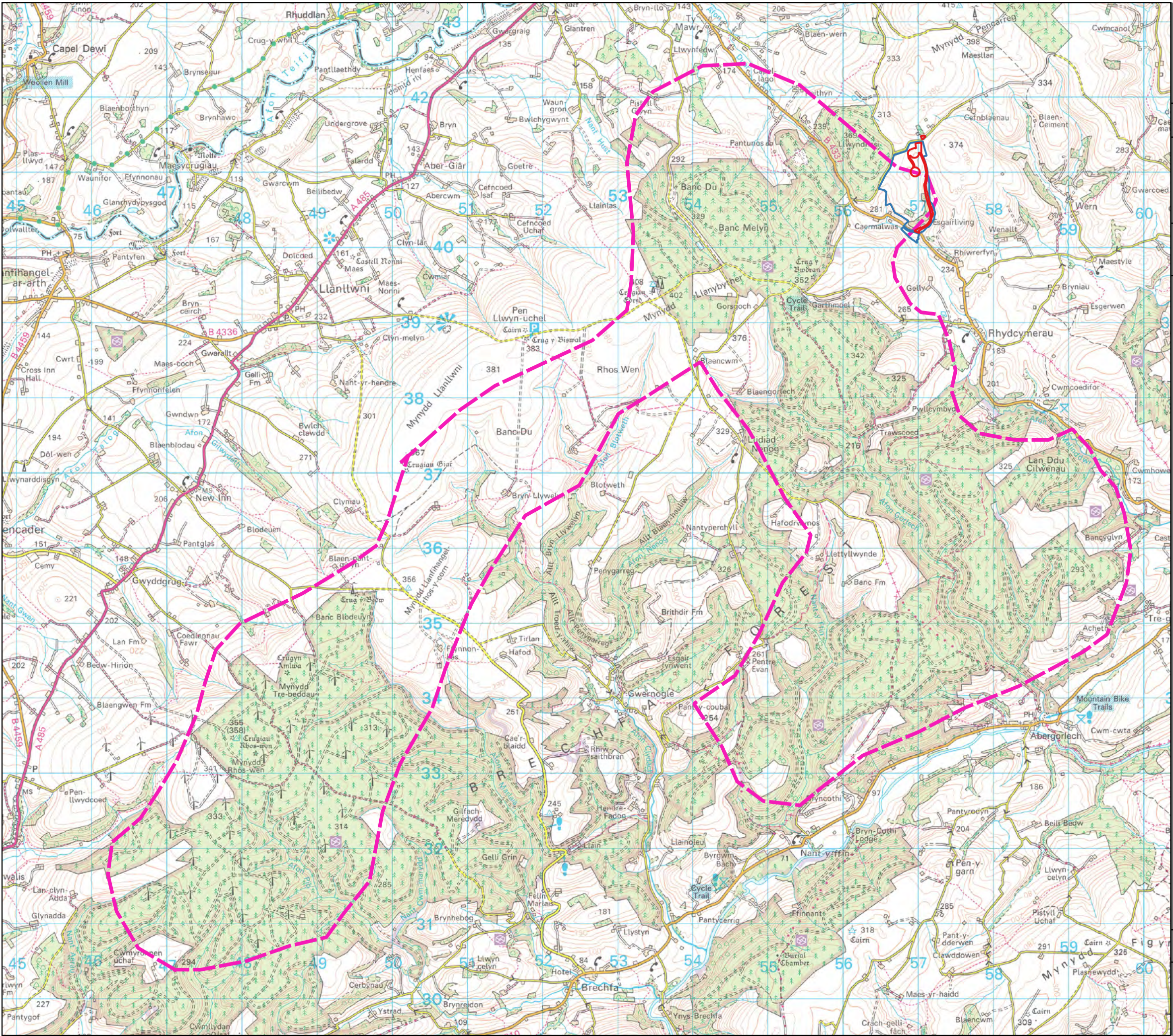
Figure 2: Site Layout

- Key:**
- Site Boundary
 - Land Under Control of the Applicant
 - Turbine Location
 - Turbine Foundation
 - Substation
 - Crane Hardstanding
 - Temporary Storage/Laydown Area
 - Temporary compound
 - Access Track



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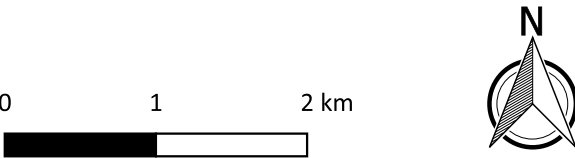


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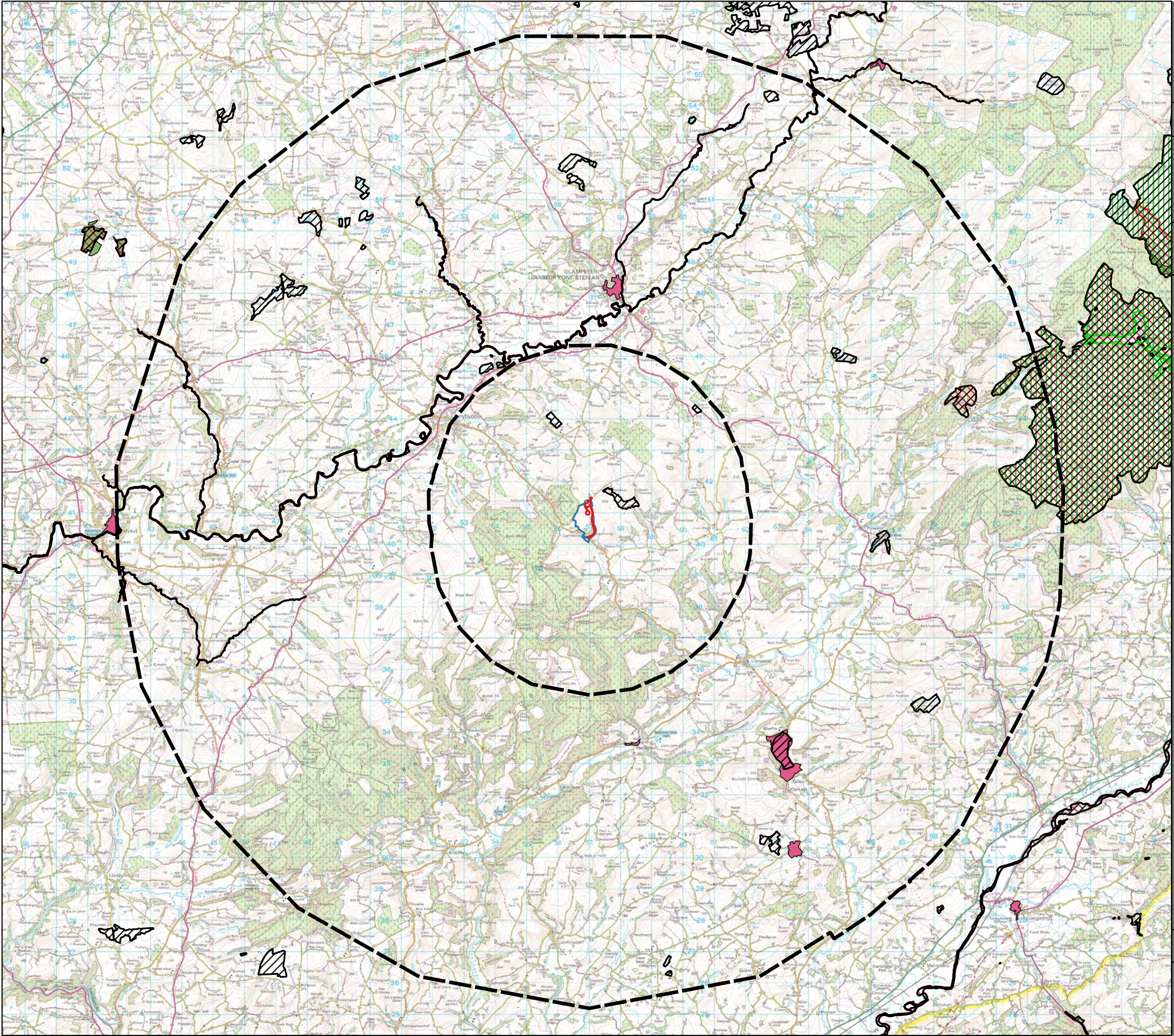
Figure 3: Strategic Search Areas

- Key:**
- Site Boundary
 - Land Under Control of the Applicant
 - Strategic Search Area G



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Figure 4: Ecological Constraints

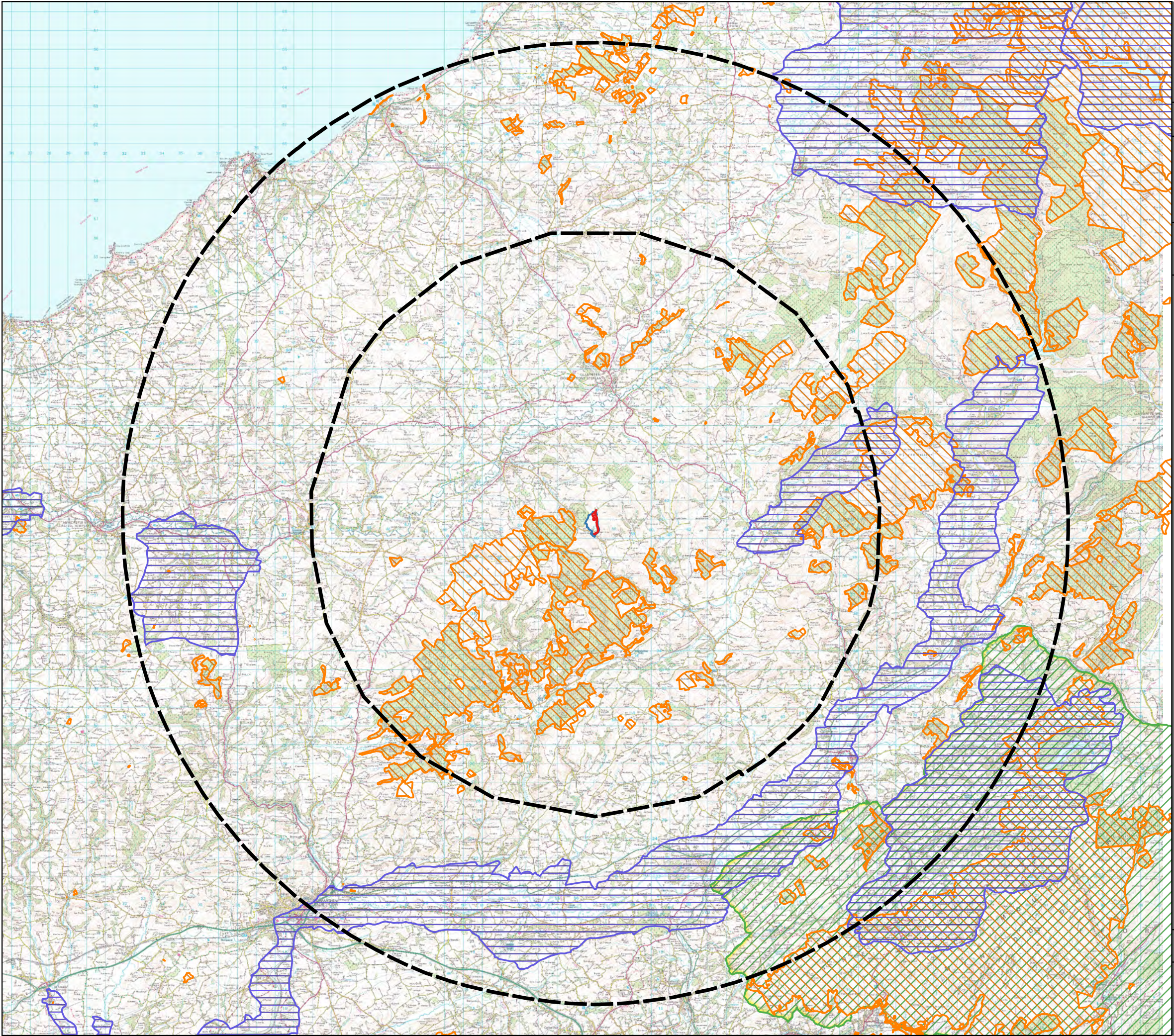
- Key:**
- Site Boundary
 - Land Under Control of the Applicant
 - Site Boundary Buffer 5km and 15km
 - SSSI
 - SAC
 - SPA
 - Conservation Area
 - National Nature Reserve

0 2.5 5 km



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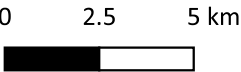


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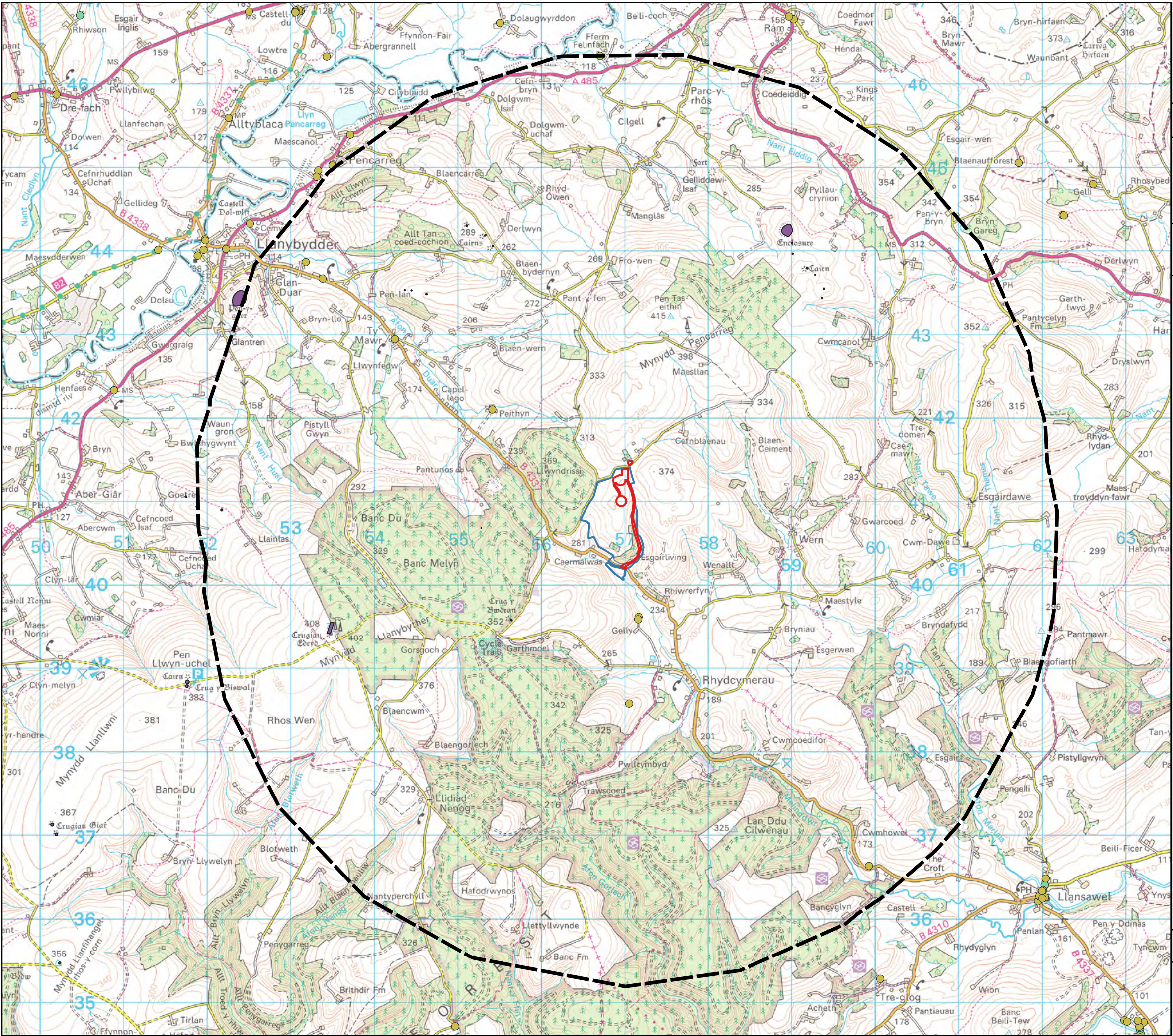
Figure 5: Landscape Designations

- Key:**
- Site Boundary
 - Land Under Control of the Applicant
 - Site Boundary Buffer 15km and 25km
 - Landscapes of Outstanding/Special Historic Interest
 - Brecon Beacons National Park
 - Open Access and Common Land



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Figure 6: Cultural Heritage Constraints

- Key:**
- Site Boundary
 - Land Under Control of the Applicant
 - Site Boundary Buffer 5km
 - Listed Buildings
 - I
 - II
 - II*
 - Scheduled Ancient Monuments

0 0.5 1 km



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Appendix 2 – Updated Cumulative Context

Wind Scheme Name (within 15km Study Area)	No. of Turbines	Approximate OS Coordinates (E/N) of each turbine	Tip Height (m)	Distance from Proposed Development site (km)	Direction from Proposed Development site	Status (O = Operational, P = In Planning, A = Approved)	Change since 2015
Pant Y Ffin	1	256559 242629	8.3	1.4	NNW	O	No change
Land South West Of Bryn Dafydd	1	259190 238410	86.5	3.4	SE	P	Withdrawn
Brechfa East & West Wind Farm	40	248909 234382 248322 234134 249274 234198 248210 233713 249974 233494 248638 233537 249460 233566 249424 233163 248899 233213 248261 233094 249734 232835 249096 232723 248524 232673 247780 232510 249331 232414 249110 231992 248695 232320 247049 232133 247885 232140 247986 231773 247347 231780 248456 231506 247319 231337 246753 231322 247865 231357 248684 231065 248004 231019 248209 230683 257582 237028 257890 236635 257911 235963 257903 235556 258146 237066 258446 236425 258469 236001 258949 236360 257057 237066 257143 236631 257322 236313 258480 236834	145 for both Brechfa West and Brechfa East	Bechfa West is 9.5km away Becha East is 3.2km away	Bechfa West is SW Bechfa East is S	A	Brechfa West = Operational with 28 turbines Brechfa East = approved in 2014 but never built, no further information since, likely abandoned
Fron	1	261522 243017	18	4.7	NNE	O	No change
Land Near Esgairwen Isaf	1	260072 244903	27.1	4.8	NE	A	No change
Land At Coedeiddig Fach	1	258785 245982	34.5	5	NNE	P	Approved
Land at Pant Y Celyn	1	2.62075E+11	86.5	5.2	NNE	P	Operational
Esgairwen Uchaf	1	260765 245350	23.5	5.6	NE	O	No change
Maes Yr Haul	1	259911 235105	9	6.6	SSE	O	No change
Lampeter Comprehensive School	1	257206 247934	17.75m	6.6	N	A	No change
Tanrhos	1	247260 246981	34.6m	11.2	NW	A	Conditions discharged, appears operational
Cathal	2	246654 247088 246719 247085	17.7m	11.7	NW	A	No change
Nantyrhogfaen	1	268124 236465	17.7	11.9	SE	O	No change
Cnwcsych	1	264210 250648	20m	11.9	NE	A	No change
Alltwalis Wind Farm	10	246231 232899 246212 233301 246651 233320 247060 233367 246797 233653 247262 232874 247354 232531 247667 232860 247352 233655 247438 233230	110	12	SW	O	No change
Field Adjacent To Tanyresgair	1	264360 251330	20m	12.4	NE	A	No change
Maesygarn	1	247541 249708	35	12.6	NW	P	Approved, record of condition discharge, potentially operational
Penrhiwpenne	2	243367 242337 243340 242347	24.5m	13.5	W	A	No change
Pant Y Gogle	2	243588 243900 243510 243900	20m	13.5	NNW	A	No change
Land At Rhydygwydd Farm	1	262477 228072	74	14.1	SSE	P	Approved and likely operational (Arachaeological watching brief took place 2016)
Pencoed Farm	1	242800 238000	25	14.4	SW	O	No change
Land At Wern	1	243012 237130	67	14.4	SW	P	Approved following appeal, appears operational
Hendre	1	244698 248982	46.3	14.4	NW	P	Approved and some conditions discharged, potentially operational

Dol Y Bont	1	259183 226227	Not specified (Rotor diameter 1.75m)	14.8	S	A	No change
Pantydefaid	1	242917 245147	35.4m	14.5	NNW	P	Refused
Brechfa North	9	251341 236444 (site centre)	150m	5.7	SW	Had not entered planning	Scoping submitted in August 2016 to PINS, Scoping Opinion received in September 2016. Nothing further has been submitted. Assumed abandoned
Llygad-enwyn Farm	1	254155 244425	77m	4	NW	Had not entered planning	Approved
Rhosfach	1	251963 228041	46.9m	14	SW	Had not entered planning	Operational
Maesnewydd	1	246715 246436	48	11.5	NW	Had not entered planning	Approved
Caeronnen Farm	1	248323 245264	36.6	9.7	NW	Had not entered planning	Operational
Ffrwd Farm	1	252847 249763	74m	9.7	NW	Had not entered planning	Operational

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