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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Pre-application Consultation Report

## Global Centre of Rail Excellence in Wales

October 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

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## Executive summary

Welsh Government, working in partnership with Neath Port Talbot and Powys Councils, has developed proposals for a Global Centre of Rail Excellence on a surface mine and coal washery site in Onllwyn and Nant Helen at the head of the Dulais and Tawe Valleys. The proposals form an important addition to the site's restoration strategy being brought forward by Celtic Energy and will act as a driver for rail industry innovation, investment and growth in Wales, the wider UK and internationally.

Comprehensive engagement with a wide range of stakeholders is fundamental to developing the best possible proposals and, in response to the complexities of this project, a phased engagement/consultation has been carried out to enable local residents and stakeholders to help inform the masterplan for the site.

As part of the business case development for the project, extensive 'soft-market-testing' has been carried out with rail industry stakeholders. This has allowed business need to be examined and technical advice to be incorporated into an initial design. This design then formed the basis of the project briefing and early engagement with residents and a wide range of local and community stakeholders (2 July - 7 October 2019).

Early engagement included online information, a series of meetings/briefing sessions and community drop in events. Residents and stakeholders were encouraged to consider the opportunities and constraints associated with the initial design and help identify how the project could maximise social and economic benefits while minimising environmental impacts.

Over 450 people attended these early engagement events to discuss the emerging proposals with members of the project team and over 70 responses were received (by questionnaire, email or phone). The majority of people spoken to were supportive of the project and the benefits it would bring to the local and wider area. Key issues raised by local people including noise, vibration, air quality and light pollution have been considered and were addressed in the draft outline planning application consulted on as part of the statutory pre-application consultation (17 September to 14 October). The issue of common land and public rights of way was also raised, which is being addressed as part of a separate consultation being led by Powys County Council.

Due to Government guidelines to help reduce the spread of Coronavirus, the statutory consultation was carried out online and discussions took place by telephone or virtual meetings via Zoom or Microsoft Teams. The project consultation webpage included a draft of the planning documents as well as a Consultation Summary Document and a Non-Technical Summary of the Environmental Statement as well as feedback mechanisms to encourage people to share their thoughts on the draft outline masterplan. Hard copies of the key consultation documents were available on request.

A total of twelve responses were received from specialist consultees and their comments have been addressed in section 5.1. To address comments raised, several additional surveys (including a night-time visual impact survey and traffic surveys) have been undertaken as well as updating the outline Construction Environmental Management Plan (CEMP), Environmental Statement (ES) and Traffic Assessment to support the

submission of the planning application.

A total of 63 responses were received from neighbours, community consultees, owner/occupiers and the wider community – through the feedback questionnaire, emails and phone calls. Those supporting the proposal recognised the economic benefits the project would bring to the area including new jobs, training opportunities, tourism potential and support for the local supply chain. Concerns were raised about the potential negative impact on local amenity and wellbeing of residents, especially with the potential for a 24/7 operation, as well as the effects of traffic, vibration and noise, air and light pollution. These comments have been addressed in section 5.2

This Pre-application Consultation Report sets out who was consulted; how they were consulted; how they were informed about the engagement/consultation process; the feedback received and how comments have been considered and responded to as appropriate in the planning application.

## 1. Project overview

- 1.1. Welsh Government working in partnership with Powys County Council and Neath Port Talbot County Borough Council, has developed proposals for a Global Centre of Rail Excellence in Wales on the site of the Nant Helen surface mine and Onllwyn coal washery site at the head of the Dulais and Tawe Valleys.
- 1.2. Celtic Energy is due to cease coaling operations at the Nant Helen site, at which point it will be restored under statutory obligations determined and consented by Powys County Council. The first application (Powys County Council ref: 19/1899/REM) for the restoration of the current working area was approved in April 2020.
- 1.3. Celtic Energy amended the restoration scheme earlier this year in order to facilitate the Global Centre of Rail Excellence project. The second planning application was for the construction of complementary restoration earthworks to create two looped landform platforms (part in cutting and part on embankment) with associated drainage infrastructure and areas of landscaping and habitat creation. The earthworks were designed to enable the Global Centre of Rail Excellence earthworks programme to progress alongside the restoration proposals. That planning application (Powys County Council ref: 20/0738/FUL and Neath Port Talbot County Borough Council ref: P2020/0362) was approved at the end of July 2020.
- 1.4. The Global Centre of Rail Excellence project offers an opportunity for significant rail investment in Wales. Transport for Wales has committed to revitalising the rail network by providing new services and rolling stock (trains and carriages), innovative solutions and a significant programme of station investment.
- 1.5. The UK Government's Rail Sector Deal (2018) sets out a new approach that promotes partnership working between the public and private sectors to increase innovation and productivity. Its aim is that the UK should deliver the benefits of new digital technology and become a world leader in rail technology and decarbonisation, boosting exports and skills.
- 1.6. The need for a world-class test facility to support and accelerate the delivery of these strategic aims has been recognised by the UK Government. As new trains and other components are introduced to the UK rail network, they need to be thoroughly tested before they become operational. Currently, UK manufactured trains are frequently transported to European testing facilities at significant cost.
- 1.7. A Global Centre of Rail Excellence will provide a multi-faceted railway testing and validation facility capable of testing both infrastructure for introduction on the railway and rolling stock. Such a facility would offer the rail industry the ability to bring forward innovation to network readiness at a much faster pace than is currently the case. This would reduce industry costs, support decarbonisation and help to facilitate innovation, increase skills and training and create jobs in the UK. Given the demand for test facilities across Europe and beyond it is expected that a Global Centre of Rail Excellence would also be well placed to attract international

business.

- 1.8. The project is also well placed to support recovery post COVID-19. Both the UK Government and Welsh Government have emphasised the importance of infrastructure spending to help kick-start the economy and ensure long-term economic recovery. The rail sector will also need to innovate to accommodate changes in customer and operator user needs as a result of the pandemic, such as adapting to a future “low contact economy”.
- 1.9. A Global Centre of Rail Excellence in Wales is well placed to provide a solution through its focus on infrastructure (including digital infrastructure), innovation and transport delivery efficiency, as well as its potential contribution to supporting transport, mobility and the economic benefits that come from connectivity.
- 1.10. The proposal looks to provide a purpose-built, modern railway infrastructure and rolling stock testing and validation facility which would form an important addition to the site’s restoration strategy and act as a driver for rail industry innovation, investment and growth in Wales, the (wider) United Kingdom and internationally.
- 1.11. A Global Centre of Rail Excellence will also act as a catalyst for rail industry investment in Wales, providing a state-of-the-art ‘innovation accelerator’ facility for research and development and testing in the UK. The infrastructure testing facility will be unique to Europe.
- 1.12. The economic benefit to Wales is potentially significant. During the construction phases, it is estimated around 240 construction jobs will be created and if each element of the facility is realised, the site could be expected to sustain around 180 jobs once fully operational. The facilities would also attract regular visitors to the area as engineers, academics and support teams use the site on a project-by-project basis, providing a potential boost to local service industries.
- 1.13. A Global Centre of Rail Excellence in Wales would require a range of different roles although some of these would be highly specialised and require skills that are not currently present within the South Wales labour market. It is envisaged that the site could become a UK hub for operational training, providing opportunities for local people to acquire the skills they need for a career in the rail industry.
- 1.14. The presence of the facility could provide the catalyst for the development of new research capabilities in Wales in the future, not least in conjunction with higher education providers. Subsequently, there is potential to develop research and education programmes that support the broader development of the rail industry in Wales and beyond and in turn generate a pipeline of skilled workers in related activities.
- 1.15. The proposals for a Global Centre of Rail Excellence in Wales include two distinct components:
  - A rail testing facility with an electrified high speed outer rail testing track (6.9km), an electrified low speed inner rail testing track (4.5 km) and a dual platform station environment (typical of the UK rail network) for testing train platform interfaces.

- A research, development, education and training centre – the ‘innovation accelerator’, associated storage and maintenance facilities.

## 2. Consultation methodology

### 2.1. Guidance

- 2.1.1. Following the adoption of the Planning (Wales) Act 2015, guidance was issued setting out the requirements for Pre-application Consultation on 'major' development plans.
- 2.1.2. As of 1 August 2016, all planning applications for 'major' projects need to be accompanied by a Pre-application Consultation (PAC) report, evidencing that the required consultation has been undertaken, reporting issues raised and if/how these have been addressed within the final proposals.
- 2.1.3. Consultation is required for a minimum 28 day period and includes:
- Displaying a site notice.
  - Writing to any owner or occupier of any land adjoining the land to which the proposed application relates.
  - Making the draft planning application information available publicly (either online or in hardcopy within the local vicinity).
  - Consulting 'community consultees' and 'specialist consultees'.
- 2.1.4. If applicants undertake publicity or consultation that exceeds the minimum statutory requirements, which is the case for this application, they are encouraged to report the outcome of this activity in the PAC report (see references to early engagement).
- 2.1.5. In May 2020, Welsh Government issued changes to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 ("DMPWO") in response to the challenges presented by COVID-19. The requirement to make information available for inspection at a location in the vicinity of the proposed development was removed for a temporary period, which was subsequently extended to 8 January 2021.
- 2.1.6. All information is required to be hosted online, with the web address and contact telephone number clearly visible on the site notice (and on all direct neighbour notification letters if different from the site notice). If hard copies of the application are requested, an application must not be submitted before the period of 14 days beginning with the day on which the last document is sent.

### 2.2. Consultation approach

- 2.2.1. Welsh Government was keen to deliver a comprehensive engagement programme for this project with stakeholders and local communities across the two local authority areas to help inform the masterplan for the site.
- 2.2.2. An Engagement and Consultation Plan was developed at the start of the project that set out: who will be consulted; how/when they will be consulted; the scope of consultation; how/when feedback will be provided; and contact details for the project.



- 2.2.3. The draft Engagement and Consultation Plan was discussed with Neath Port Talbot and Powys County Council's planning officers and local elected representatives. Their views were taken into consideration and incorporated into the final Plan. This included extending the consultation zone, adding stakeholders to engage/consult and providing advice regarding the venues and timing of the drop in events during the early engagement.
- 2.2.4. A thorough, two stage engagement/consultation programme was delivered:
- Stage 1: Project briefing/early engagement (2 July – 17 October 2019)
  - Stage 2: Statutory pre-application consultation (17 Sept – 14 October 2020)
- 2.2.5. Details of the consultation can be found in Chapter 4 of this report.

### **2.3. Consultees**

- 2.3.1. Welsh Government engaged/consulted with people living and working within the vicinity of the site and delivered information about the draft proposals and how to view/comment on them to over 9,500 local residential and business addresses.
- 2.3.2. The wider community was also notified of the engagement/consultation through advertising and site notices around the site.
- 2.3.3. As well as residents and businesses within the defined consultation zones, Welsh Government consulted local stakeholders, including political and community representatives, as well as specialist/statutory consultees.
- 2.3.4. For stage 1: project briefing / early engagement - a full list of consultees is set out in sections 4.2.4 and 4.2.5 of this report. For stage 2: statutory pre-application consultation - a full list of the consultees is set out in sections 4.3.7 and 4.3.8 of this report.

### 3. Consultation tools

3.1.1. A two-stage engagement/consultation programme was undertaken to help shape the plans for the Global Centre of Rail Excellence project. This section sets out the consultation tools used to notify and inform consultees about the engagement/consultation and feedback mechanisms provided to encourage responses.

#### 3.2. Stage 1: Project briefing/early engagement

3.2.1. As part of the business case development for the project, extensive 'soft-market-testing' has been carried out with rail industry stakeholders. This has allowed business needs to be examined and technical advice to be incorporated into an initial design. This design then formed the basis of the project briefings and early engagement with residents and a wide range of local and community stakeholders between 2 July - 7 October 2019.

##### ***Project briefings***

3.2.2. On 21 May 2019 Ken Skates AM made an **oral statement** on progress for a Global Centre of Rail Excellence in Wales. He provided an update on the outline business case and Joint Venture Agreement entered into by Welsh Government with Neath Port Talbot and Powys County Councils, highlighted some of the key benefits the project could bring forward and announced the forthcoming public engagement. This was followed by a briefing session for Assembly Members.

3.2.3. A **briefing meeting** was also offered to elected representatives including AMs/MPs and Community Councils. This offer was taken up by Kirsty Williams AM and Tawe Uchaf Community Council.

##### ***Stakeholder and community letters***

3.2.4. A letter was sent to over 300 local stakeholders to introduce them to the project and invite them to a stakeholder preview in advance of the public drop-in sessions (see Appendix 1).

3.2.5. A letter introducing the proposals and advertising the public drop-in sessions (see Appendix 2) was sent to over 9,500 local residents/businesses within the core engagement/consultation zone agreed with local representatives during discussions on the Engagement/Consultation Plan. This included addresses in Abercraf, Caehopkin, Coelbren, Onllwyn, Seven Sisters, Glynneath, Crynant, Ystalyfera and Ystradgynlais. See Appendix 3 for a map of the engagement/consultation zone.

##### ***Stakeholder preview***

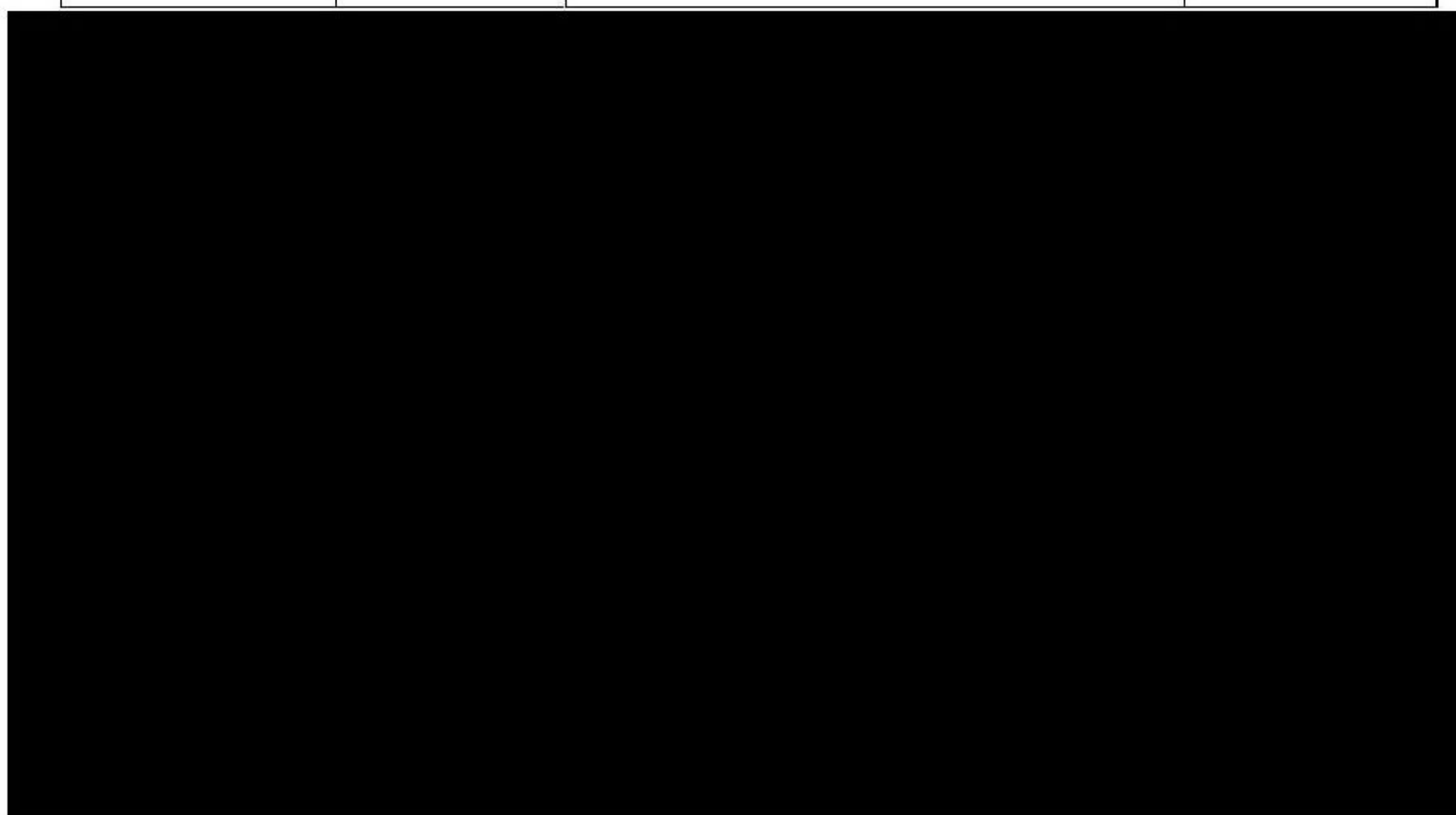
3.2.6. Over 36 councillors and representatives from local community groups attended the stakeholder preview from 10am to midday on 17 July 2019 at Onllwyn Welfare Hall.

##### ***Public drop in sessions***

3.2.7. Public drop-in sessions were held to enable people to discuss the opportunities, site considerations and emerging proposals with members of the project team (from Welsh Government, Arup and Grasshopper Communications). Two public

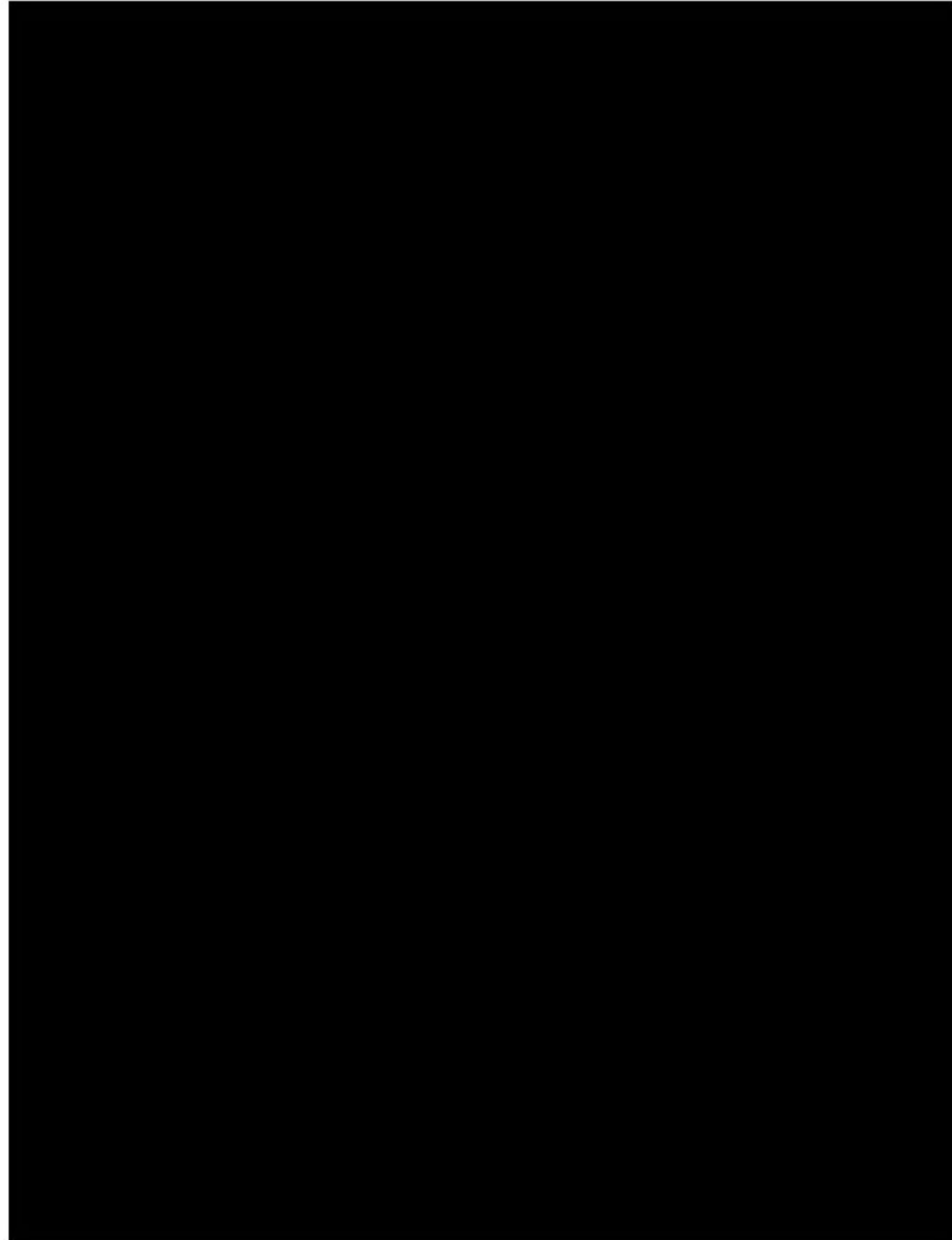
drop-in sessions were initially planned - in Onllwyn and Abercrave. At the request of residents and Kirsty Williams AM, an additional drop-in session was organised in Coelbren.

<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Attendance</b>
17 July 2019	1pm-7pm	Onllwyn Welfare Hall	188
18 July 2019	1pm-7pm	Abercrave Miners Welfare Hall and Institute	133
3 Sept 2019	3pm-7pm	Coelbren Welfare Hall	60



3.2.8. A drop-in session was also held at Celtic Energy's site offices, Nant Helen for staff.

<b>Date</b>	<b>Time</b>	<b>Location</b>	<b>Attendance numbers</b>
30 July 2019	1pm-3pm	Celtic Energy Site Offices, Nant Helen	31



### **Webpage**

3.2.9. The project webpage - <https://gov.wales/global-centre-of-rail-excellence> - was updated to include a summary document that introduced the project to a wider audience, provided information about the emerging proposals and advertised the engagement events and feedback mechanisms. All engagement material was available in English and Welsh.

### **Response form**

3.2.10. The community and other stakeholders were encouraged to share their views on the proposals through a response form, which was available online and in hard copy at the public drop in events (see Appendix 4).

3.2.11. A hard copy of the project briefing and early engagement document was also available for attendees to take away. The response form and engagement document were available in Welsh and English. An email address, phone number and freepost were also available for respondents to make their views known.

3.2.12. 72 responses were received, and these have been amalgamated and summarised in the next chapter of this report. More detail is available in the early engagement Consultation Report:  
<https://gov.wales/sites/default/files/consultations/2020-09/global-centre-of-rail-excellence-summary-of-responses.pdf>

### **Advertising**

3.2.13. The project, engagement process and drop-in sessions were advertised through a variety of channels including:

- Adverts were placed in the South Wales Guardian (12 July) and South Wales Evening Post (15 July) - see Appendix 5
- Posters were sent to community venues and Community Councils in the local and wider vicinity to put up on public noticeboards - see Appendix 6.
- Welsh Government used its Twitter channels to promote the engagement/ events.

### **3.3. Stage 2: Statutory pre-application consultation**

- 3.3.1. A statutory 28-day pre-application consultation was undertaken from 17 September to 14 October 2020 in line with the requirements of the Planning (Wales) Act 2015.
- 3.3.2. In response to the COVID-19 situation, Welsh Government amended the pre-application consultation process, which came into force on 19 May 2020. To meet the requirements of the Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 (“the Amendment Order”), the pre-application consultation was held online and a contact telephone number and email address was provided. Hard copies of key consultation documents were available on request.

#### ***Site notices***

- 3.3.3. A bilingual Site Notice was produced in line with the requirements of the Planning (Wales) Act 2015 and included full details of the statutory consultation and the project webpage, containing the draft planning application and feedback mechanisms. The notices gave:
- details of the public computer facilities to view this information online (available during the consultation period on a pre-booking basis at identified libraries).
  - a contact email address and telephone number to request paper copies of the proposals.
- 3.3.4. A copy of the Site Notice (see Appendix 7) was placed in 10 locations around the site (see Appendix 8).

#### ***Notification to specialist consultees***

- 3.3.5. A bilingual letter and accompanying notice (see Appendix 9) were posted on 15 September 2020 and emailed on 17 September 2020 to all relevant specialist consultees in line with the requirements of the Planning (Wales) Act 2015; providing information and requesting feedback on the draft proposals. A list of the specialist consultees can be found in Appendix 10.

#### ***Notification to community consultees, residents and neighbouring landowners***

- 3.3.6. A bilingual cover letter and a statutory Notice (in line with the requirements of the Planning (Wales) Act 2015) was sent to community consultees and neighbours (see Appendix 11). This information explained the full details of the pre-application consultation process, including the web address of the project page containing details of the full draft planning application, a contact



email address, link to an online feedback form and telephone number for enquiries, requests for hard copies of the planning documents or comments.

- 3.3.7. This information was posted first class on 15 September 2020 to:
- 256 community consultees (see Appendix 12), including:
    - All local ward members of both Powys County Council and Neath Port Talbot County Borough Council
    - The clerk at Blaengwrach Community Council, Glynneath Town Council, Onllwyn Community Council, Severn Sisters Community Council, Tawe Uchaf Community Council and Ystradgynlais Town Council
    - Four MPs and eight local and regional MSs
    - 104 local stakeholder groups
  - Two landowners (see Appendix 13)
  - 901 residents and 26 businesses neighbouring the site (see Appendix 14 – list of boundary neighbours)

3.3.8. This information was posted second class on 16 September 2020 to a further 8,814 residents/business in the local area (see Appendix 15).

### **Webpages**

3.3.9. On 16 September, the project webpage: <https://gov.wales/global-centre-of-rail-excellence> was updated to include a summary of the project, overview of the proposals, progress on the project, the project timetable and links to the consultation page.

3.3.10. The draft planning application documents were also made available on the project consultation webpage: <https://gov.wales/global-centre-of-rail-excellence-planning-pre-application>. This included the following documents:

- Consultation document
- Environmental statement non-technical summary
- Environmental statement volume 1
- Environmental statement volume 2 appendices 2a to 6a
- Environmental statement volume 2 appendices 7a to 15c
- Environmental statement volume 3: figures
- Planning, design and access statement
- Transport assessment
- Masterplan
- Site location plan
- Example of a draft application for planning permission to Powys County Council
- Example of a draft application for planning permission to Neath Port Talbot Borough Council

3.3.11. The webpages, Consultation document and Environmental Statement non-technical summary were available in English and Welsh.



### **Response form**

3.3.12. The response form was available on the project consultation webpage to be completed online and was available in English and Welsh.

3.3.13. It was also possible to download a response form and return it by email to: [consultation@grasshopper-comms.co.uk](mailto:consultation@grasshopper-comms.co.uk) or posted to Freepost, GRASSHOPPER CONSULT (no stamp or further address required). Hard copies were available on request.

3.3.14. A copy of the bilingual response form can be found in Appendix 16.

### **Advertising**

3.3.15. A bilingual advert was placed in the following newspapers, with information about the consultation and how to view the draft planning application:

- South Wales Echo on 17 September 2020 on p11 (see Appendix 17)
- South Wales Guardian on 23 September 2020 on p12 (see Appendix 18)

### **Media/social media**

3.3.16. A press release was issued to local and regional newspapers and broadcast media on 16 September to announce the consultation and provide an overview of the project (see Appendix 19) and the consultation was promoted via Welsh Government's social media channels.

3.3.17. Local members were also encouraged to share details of the consultation and encourage participation through their social media channels during project updates before the launch of the consultation.

### **Briefings/meetings**

3.3.18. Briefing meetings were provided to local members at Neath Port Talbot County Borough Council and Powys County Council in advance of the consultation launch on 17 September.

3.3.19. A virtual meeting was held with Tawe Uchaf Community Council on 8 October 2020. The project team gave a presentation on the project before taking questions from members present. Key issues raised are captured in the response section in the next chapter.



## 4. Consultation results, issues and responses

### 4.1. Early Engagement

- 4.1.1. Over 450 people participated in the early engagement on proposals for a Global Centre of Rail Excellence and 72 responses were received (by questionnaire, email or phone).
- 4.1.2. A high level of support was expressed for the proposals with 59% of respondents indicating that the site was very suitable/fairly suitable for a Global Centre of Rail Excellence. Those in support noted the potential socio-economic benefits including local jobs (during construction and operation) and potential opportunities for the local supply chain and tourism. Many felt that the area was in need of investment and the proposal offered an opportunity to regenerate an existing brownfield site.
- 4.1.3. There were also a wide range of environmental issues raised, particularly by people living in close proximity to the site. In particular concerns were highlighted about noise, traffic, vibration, light, air quality and visual impact - particularly in relation to the potential for 24/7 operation, which would potentially have a detrimental impact on the local amenity.
- 4.1.4. A number of respondents also expressed concerns about the increased use of the branch line to bring in rolling stock and impact on local roads.
- 4.1.5. The summary of responses is available to view on the Welsh Government's webpage for a Global Centre of Rail Excellence in Wales:  
<https://gov.wales/sites/default/files/consultations/2020-09/global-centre-of-rail-excellence-summary-of-responses.pdf>.
- 4.1.6. All comments received during the early engagement were reviewed and taken into consideration as the proposals evolved.

### 4.2. PAC consultation

#### **Specialist consultees**

- 4.2.1. Twelve specialist consultees responded to the consultation. The key issues raised by each consultee and the applicant's response is summarised below. The full responses can be viewed in Appendix 20.

	<b>Key issues raised</b>	<b>Response</b>
1	<b>The Glamorgan Gwent Archaeological Trust</b> No objection to the application. Historic Environment to be addressed by condition for mitigation.	Noted.



2	<p><b>Clwyd-Powys Archaeological Trust</b> No objection to the application. Historic Environment to be addressed by condition for mitigation</p>	Noted.
3	<p><b>Cadw</b> No objection to the application subject to the outcome of the Scheduled Monument Consent. Historic Environment to be addressed by condition for mitigation.</p>	The applicant is in close dialogue with Cadw regarding the Scheduled Monument Consent application, which will be submitted alongside the GCRE planning application for consideration.
4	<p><b>Neath Port Talbot (NPT) Highways</b> Support for the application as boosting the local economy. Further discussions awaiting.</p>	The applicant is in close dialogue with NPT Highways on the scope of the Transport Assessment work that supports the application.
5	<p><b>Powys Highways</b></p> <ul style="list-style-type: none"> <li>• <b>Transport Assessment</b> – insufficient traffic counts (only 24hour not minimum seven day neutral period). Consider traffic projections to be conservative. Consider traffic in phase 1 to have a greater impact. Are additional surveys going to be undertaken?</li> <li>• <b>Northern access from A4221</b> – no junction counts and trips from this access have not been considered. No indication of what this access will be used for. Will additional clarification be provided?</li> <li>• <b>Onllwyn Road Junction from the A4221</b> – junction not included in scope of Transport Assessment (no access counts to determine levels/disruption of traffic). Will additional counts be undertaken? Why has it been excluded?</li> <li>• <b>Active Travel considerations</b> – welcome cycle/pedestrian link between site and Ystradgynlais. Additional information is welcomed.</li> <li>• <b>Potential unauthorised viewing area on Onllwyn Road</b> that ‘could give rise to increased levels of traffic and increased levels of indiscriminate on-street parking. The HA there seeks clarify on the level of visitors/spectators the facility is likely to generate and the measures that will be implemented to accommodate them safely within the site’.</li> </ul>	<p>The applicant is in close dialogue with Powys Highways.</p> <p>Additional surveys have been scoped in consultation with both Powys and Neath Port Talbot Highways officers.</p> <p>All other points will be included within a revised Transport Assessment that will be submitted as part of the planning submission.</p>

<p>6</p>	<p><b>Natural Resources Wales (NRW)</b></p> <p><b>Landscape - Visual effects</b>          “There would be significant adverse visual effects on receptors at eight viewpoints within the park for a considerable time period (during the four-year construction period and continuing for up to 15 years after completion). Beyond 15 years significant adverse effects would remain at two viewpoints. The woodland planting proposed should integrate much of the development into the surrounding landscape within the 15-year period. However, some of the rail infrastructure and engineered features (overhead lines and cuttings) will remain noticeable as permanent features in the views and continue to have an adverse effect on the scenic quality of views and the sense of tranquillity &amp; remoteness.”</p> <p>There is potential for light pollution and impact on the National Park’s Dark Skies. A light pollution/ dark skies assessment is required to be undertaken and used to influence the final lighting scheme.</p>	<p>A night-time survey has been undertaken. The assessment will be included within the final submission at Appendix 9E of the Environmental Statement.</p>
	<p><b>Mitigation</b>          “Whilst some additional native tree and shrub planning .... may help to reduce the visual impact of the buildings, it would not be possible to reduce the adverse effects of the rail infrastructure that has been identified in the Landscape Visual and Impact Assessment (LVIA).</p> <p>“We believe there is benefit in investigating the inclusion of Green Infrastructure in the design of the buildings at the washery and advise this should be completed alongside a colour assessment to reduce the long-term effects of the development on the BBNP.”</p> <p><i>Requirement 1 - Plans: All plans associated with this development are amended in line with the established principles of habitat mitigation/enhancements agreed under consented application 20/0738/FUL.</i></p> <p><i>Condition 1 – CEMP: No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has</i></p>	<p>The application is in outline with all matters reserved.</p> <p>At the detailed design stage, the role that green infrastructure can play alongside the design evolution of the buildings will be explored in terms of screening and framing certain buildings and plant/infrastructure, as well as softening the impact of hard surfacing etc.</p>

<p><i>been submitted to and approved in writing by the Local Planning Authority.</i></p> <p><i>Condition 2 – EMMP: Prior to the operation of the development, or phase of development, an Environmental Management and Monitoring Plan (EMMP), detailing strategies for the management, maintenance and monitoring measures of the ecological, environmental and landscape features at the site shall be submitted to and approved in writing by the Local Planning Authority.</i></p>	
<p><b>Protected Sites</b>          “We consider that the development is not likely to have a significant effect on the SACs identified.”</p>	Noted.
<p><b>Sites of Special Scientific Interest (SSSI) –</b></p> <p><b>1. Sensitive Freshwater Receptors:</b> “Based on the information submitted in the outline CEMP (ES Appendix 3A) and provided the outlined measures are implemented, we consider that the development is not likely to damage the features for which Nant Llech and Gorsllwyn Onllwyn SSSIs are of interest. (Condition 1).”</p> <p><b>2. Sensitive Aerial Receptors 0 NOX and SO2:</b> “We concur with the conclusion of the ES on the assessment of effects related to changes in traffic flows associated to the construction and operational phase of the development. Tables 14-6 and 14-9, indicate that additional construction traffic and operational traffic flows would not be high enough to trigger further assessment.</p> <p>“NRW do not agree with the ES conclusion that ‘an assessment of rail impacts on ecological receptors can be screened out and the impact can be considered negligible.’</p> <p>“We advise that both NOX and SO2 concentrations should be less than 1% of the critical level at the Gorsllwyn Onllwyn SSSI.’ NRW set out Requirement 2.”</p> <p><i>Requirement 2 – Air Quality: The submission of a revised ‘Air Quality’ chapter (section 14) of the Environment Statement</i></p>	<p>Noted.</p> <p>This is noted and further details on relevant concentrations have been</p>

<p><i>(ES) to include appropriate screening criteria and assessment of effects on sensitive ecological receptors.</i></p> <p><b>3. Sensitive Aerial Receptors – Dust:</b> The “buffer zone” includes land within the Gorsllwyn Onllwyn SSSI, as illustrated in Figure 14.2. If the usual value used to identify nuisance dust deposition in residential areas is applied (200mg/m<sup>2</sup>/day), and appropriate measures are taken to reduce emissions in a timely manner if required, we do not consider there would be a significant impact on protected sites.</p> <p>We advise that dust level deposition of 500mg/m<sup>2</sup>/day or more to be damaging to the Gorsllwyn Onllwyn SSSI.</p>	<p>presented in the final submission.</p> <p>Noted.</p> <p>Noted.</p>
<p><b>Preparation of Management Plans:</b>  NRW proposed two documents to be produced:</p> <ul style="list-style-type: none"> <li>• Construction Environmental Management Plan (CEMP)</li> <li>• Environmental Management and Monitoring Plan (EMMP)</li> </ul> <p>Requirements set out in Condition 1 and 2 above.</p>	<p>Noted.</p> <p>An outline CEMP is included at application stage (ES Appendix 3A) and the detailed CEMP and EMMP will be conditioned and prepared in advance of reserved matters submissions.</p>
<p><b>Projected Species:</b>  “Based on the survey results and the mitigation measures proposed, we are satisfied that the development is unlikely to significantly affect European Protected Species (EPS). We consider all recommendations described in the Environmental Statement (ES) to be appropriate, however, further information is required for measures to reduce the collision risk to bats and otters due to the operation of trains along the tracks which will continue into the evening and at night.</p> <p><i>“Requirement 3 – EPS: The submission of information regarding the installation of safe rail track crossing points for bats and otters to demonstrate the development is not detrimental to the maintenance of the population of any EPS species concerned at a favourable conservation status in its natural range.”</i></p>	<p>Further information on bats and otters, regarding potential collision risk, are presented and discussed within the Environmental Statement.</p>

	<p><b>Land contamination and water quality:</b>          “We have no comments to make on site drainage.’          ‘We consider the site to be of lower environmental sensitivity as confirmed by the desk study within Appendix 6A. Therefore, we do not consider it necessary to provide the LPA with advice at the planning application stage. We do however advise that the treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.”</p>	<p>Noted.</p>
	<p><b>Environmental Permits / Exemptions:</b>          “The operation of the (‘decommissioning’) shed may require an environmental permit or exemption under The Environmental Permitting (England and Wales) Regulations 2016. An environmental permit or exemption must be in place before any waste activity takes place on site.</p>	<p>Noted.</p>
<p>7</p>	<p><b>Brecon Beacons National Park Authority</b>          The Brecon Beacons National Park Authority currently has <b>very significant concern</b> that the proposal will have adverse impacts on one of the National Park’s statutory purposes.          Key issues raised relate to <b>landscape and visual impacts:</b></p> <ol style="list-style-type: none"> <li>1. <b>Night-time assessment</b> – “The LVIA currently omits a night-time assessment. This assessment is required in order to understand the full impact on the National Park and the near-by Dark Sky Reserve.”</li> <li>2. <b>Visual effects</b> – “The Environmental Statement outlines that there would be residual effects to 4 visual receptors following the establishment of mitigation planting at year 15. Viewpoints 2, 3 and 9 having moderate adverse beyond the 15 years and viewpoint 14 having a major adverse impact. Three out of four of these viewpoints are from within the National Park. On this basis the National Park Authority still has very significant concern with the proposal and requires further planting mitigation to be incorporated in areas around the northern and eastern areas of the Washery site and also use of other means to integrate the development into the landscape to be detailed (e.g. use of green or brown roofs etc).”</li> </ol>	<p>A night-time survey has been undertaken. The assessment is included in Appendix 9E of the final application submission.</p> <p>Marshy grassland within the north of the Washery is a priority for retention as this is linked to Gors Llwyn SSSI to the north. Other retained grasslands in this area are species-rich and important for the invertebrate populations they support. Additional trees planting would not be appropriate in this location as this would compromise existing ecological value of habitats in this area.</p>

<p>3. <b>Landscape effects:</b> “The Environmental Statement outlines moderate adverse effects on the landscape during construction and during the operation landscape impacts are moderate adverse with the impact of the mitigation planting taking at year 15 changing two out of three landscape character areas to have minor adverse landscape impacts. The National Park Authority maintains significant concern with the proposal’s impact on the special qualities of the National Park.”</p> <p>4. <b>Effective management and monitoring of mitigation planting:</b> “the basis of much of the landscape and visual conclusions outlined in the Environmental Statement are on assumption that the proposed mitigation planting establishes itself as expected in the 15-year period. It is also noted that some of the specific detail on the planting is stated ‘to be developed at detailed design stage’ and there is also a planning condition attached to the earthwork’s permission requiring further detail too.</p> <p>The National Park Authority has <i>outlined reservations regarding the adequacy/ effectiveness of this mitigation measures in reality (see previous comments on the earthworks application) and has outlined above, the need for additional mitigation around the Washery site in particular.</i></p> <p>The National Park requests careful consideration to:</p> <ul style="list-style-type: none"> <li>• ‘the mechanism to ensure the long-term management and maintenance of this planting’</li> <li>• ‘an appropriate mechanism for the effective monitoring of landscape and visual effects in the future’.</li> </ul> <p>It is the National Park Authority’s view that effective monitoring may require (more numerous time interval) photomontages in the Environmental Statement to enable effective comparisons/ monitoring to be undertaken in the future (and interventions to be made is required).’</p>	<p>Noted and it is for the LPA to weigh any impacts in the overall planning balance.</p> <p>The photomontages provided represent the year 15 scenario where planting is established and provides its function.</p> <p>Year 1 landscape and visual impacts, where planting is yet to be sufficiently established to fully mitigate effects, are captured within chapter 9 of the Environmental Statement.</p> <p>Providing photomontages portraying additional scenarios is therefore not deemed necessary.</p>
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8	<p><b>WG Land, Nature and Forestry Division</b>  “The Predicative Agricultural Land Classification (ALC) map notes the site to be mainly Grade 5 with areas of Grade 4.</p> <p>“An ALC survey of the proposed site is not recommended, as it is unlikely to contains BMV agricultural land. Therefore, BMV policy (PPW, paragraphs 3.54 &amp; 3.55) will not apply to this application.”</p>	Noted.
9	<p><b>Mid and West Wales Fire and Rescue Authority</b>  “The developer should consider the need to provide adequate water supplies for firefighting on the site.”</p>	Noted and will no doubt be a consideration at the detailed design stage when operational requirements are being defined.
10	<p><b>Western Power Distribution (South Wales) PLC</b>  “WPD generally supports the scheme and notes that the scheme will be electrified. Should new equipment need to be installed such as substations and associated infrastructure we encourage the developer to engage with WPD to ascertain whether such infrastructure needs planning permission to connect the project to the electricity network.</p> <p>“WPD also encourages the developer to continue to engage with WPD and in particular consult directly if any changes to the current consented landform is likely to conflict with WPD's assets.”</p>	<p>Noted.</p> <p>The applicant will continue to engage with WPD if there are any changes to the current consented landform that may conflict with WPDs assets.</p>
11	<p><b>Dŵr Cymru</b>  ‘The scheme is located within an unsewered area therefore we recommend the applicant seeks an alternative method of sewerage treatment. A water supply can be made utilising an existing connection at the national grid reference -284571, 210338.’</p> <p>The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. ‘The developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a</p>	A Sustainable Drainage Approval Body (SAB) pre-application submission has been made to Powys County Council.

	<p>combined sewer shall only be made as a last resort.'</p> <p>'Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales. It is therefore recommended that the developer consult with the Powys County Council.'</p> <p>'No highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.'</p>	
12	<p><b>Transport for Wales</b></p> <p>Support for the GCRE proposals in which several key organisations are working together to support the innovation and growth of the rail industry in Wales, UK and internationally.</p> <p>It will provide benefits to Transport for Wales "in our ability to 'research, develop, innovate whilst developing knowledge and skills which will benefit improved delivery for our customers."</p>	Noted.

***Community Consultees, residents and neighbouring landowners' consultation***

4.3.1. A total of 63 responses were received - 50 feedback forms and 13 email/ phone calls giving feedback on the proposals.

4.3.2. Respondents gave similar comments under each of the questions in the feedback form and emails/phone calls. To assist with collating responses to the issues raised, we have themed the feedback into the following categories:

- Economic benefits – jobs and skills, local investment, tourism
- Impact on local amenity
- Innovation for rail industry
- Traffic and transport
- Noise
- Hours of operation
- Environmental issues
- Loss of common land
- Site considerations
- Construction requirements
- Detailed design



- Working practices/training
- Community engagement
- Consultation process
- Use of the facility
- Site is unsuitable
- Project viability
- No development
- Other comments

4.3.3. Question 1 of the feedback form asked respondent to rank how important the different economic and social benefits identified are to the local area? Of the 46 responses to this question, respondents felt that tourism opportunities (58%), local investment (56%), local skills and training (56%), boost to local services/supply chain (51%) and developing new industry to replace coal mining (51%) were very important/important.



4.3.4. The table below summaries the feedback from community consultees, residents and neighbouring landowners as well as the feedback from the Tawe Uchaf Community Council meeting and provides a response from the applicant.

Comments	Responses
<b>Economic Benefits</b>	
Concerns that the economic benefits will not benefit the local community.	There will be a broad spectrum of economic benefits from job creation, training and learning links with local education providers, supply chain



	opportunities and a role to play in the local visitor/tourism sector through over-night stays and the additionality effects that creates.
<b>Jobs and skills</b>	
Opportunity to create local jobs and learning opportunities for local people. Concerns that the jobs will not be for local people. What reassurances can be given that there will be employment opportunities for local people?	There will a range of employment opportunities available given that the proposal is multi-faceted and will require a diverse workforce across the different aspects of the scheme. Opportunities for up-skilling/re-skilling and new employment will naturally need to draw upon a locally based workforce. There are contractual measures that can be put in place with an eventual site operator to require it to seek local employment (and purchasing) where possible.
Need to consider training / apprentices for local people – especially younger people. Potential for other education opportunities for local learners from professionals inspire future generations to open days and workshops.	There are clear opportunities to work with local and other Wales based education providers to explore training and apprenticeships.
Further details requested on the calculation of economic benefits.	The Outline Business Case (OBC) has been submitted to the Planning Authorities under Joint Venture Agreement.
<b>Local investment</b>	
Investment/regeneration in the area and support for the local supply chain and services.	The Outline Business Case and in fact the planning application submission through the Environmental Statement describes the opportunities for local regeneration. The ES (Chapter 12) references the Welsh Government's Community Benefits guidance <sup>1</sup> and states that the potential developers/operators would be required to confirm how they would maximise benefits for the local economy in line with the guidance.

<sup>1</sup> Welsh Government (2014) Community Benefits: Delivering Maximum Value for the Welsh Pound <https://gov.wales/sites/default/files/publications/2019-09/community-benefits-deliveringmaximum-value-for-the-welsh-pound-2014.pdf>



<p>Opportunity for collaboration between industry, Transport for Wales and the universities.</p>	<p>The project has been developed, shaped, checked and challenged with the close involvement of the rail industry throughout. The Outline Business Case has also been developed with close industry involvement ensuring that the proposal responds to the needs of the rail industry and also to the wider opportunities for development and learning through links with the education sector, which has also had a close role in the 'innovation accelerator' component of the scheme proposal.</p>
<p>Opportunities to regenerate local facilities and incorporate leisure facilities.</p>	<p>Whilst this application is not specifically leisure related, the existing landowner Celtic Energy would retain some land ownership at Nant Helen and has aspirations to create a leisure offer.</p> <p>GCRE has the potential to require over-night accommodation and could generate market interest for the development of a hotel locally.</p>
<p>Concerns that there will be no support for the local supply chain.</p>	<p>There are obvious supply chain linkages available given the scale and breadth of the proposal.</p>
<p>Tourism</p>	
<p>Tourism opportunity to create a visitor experience at the site – with wider educational opportunities.</p>	<p>This has been raised through early consultation and there is potential that any conference space developed could include interpretation/exhibitions on the facility as well as a showcase for the history of rail transport. This could be a resource that could benefit school children, local community and visitors from further afield.</p>
<p>Concerns the project would be detrimental to tourism in the area.</p>	<p>The application documents paint a clear picture that there are positive opportunities for tourism linked to the project as opposed to it being a development that would dissuade people coming to the locality for leisure and tourism.</p>
<p>Opportunity to provide new accommodation in the area. For</p>	<p>Noted and yes there is a clear opportunity for GCRE to stimulate a</p>

example, consider building a hotel at the Glynneath (western) junction of the A465.	market demand for over-night accommodation in the locality and year-round, thus extending the season.
Use IT to encourage tourism.	Noted.
<b>Impact on local amenity</b>	
Negative impact on the wellbeing of the local community – especially with 24/7 operation.	The Environmental Statement assesses the proposal against a host of topics that have a wellbeing context such as noise, vibration, air quality and visual impact. The assessment demonstrates that where there are impacts, the scheme can mitigate them to an extent that the proposal is acceptable in planning terms.
Additional pressure on local facilities and services	It is not envisaged there will be pressure on facilities and services arising from the scheme. This is not a residential proposal where demand for access to services or pressure on school places is a relevant concern.
Concern about the height of buildings and visual impact. Suggest sustainable/eco buildings	<p>The Environmental Statement includes a comprehensive Landscape and Visual Impact assessment (Chapter 9) which deals with this topic. Whilst the application is in outline, scale parameters have been set for the heights of buildings. By concentrating the buildings at the site of the existing Washery where there are existing buildings of scale, it is considered that a sound masterplanning approach has been taken to the siting and massing of buildings.</p> <p>The detailed design of the buildings will be considered at the reserve matters stage. Comments regarding potential sustainable/eco buildings is noted.</p>
Concern about asbestos on site in decommissioned trains and how hazardous material will be treated/disposed.	There will be conditions put in place to ensure that the facility is appropriately consented and permitted as part of the operational phase.
Impact on tranquility of the area.	The Environmental Statement includes comprehensive assessments for both



	<p>noise (Chapter 10) and for landscape/visual impact (Chapter 9) – both key components of perceived tranquility. These two disciplines are working closely together through the design process to provide mitigation for the project which minimise both noise and visual effects.</p> <p>Sound from the facility may well be audible in the surrounding area – just as the facility will still be visible from some viewpoints – however, mitigation in the form of noise barriers and planting will be provided to avoid adverse effects on health and quality of life due to noise for all communities near the facility, and to minimise visual impact.</p>
<p>Detrimental impact on house values.</p>	<p>Impact of new developments on property values is always difficult to quantify but we would hope that a clean, modern industrial facility would be perceived as less detrimental than an operational open cast mine to potential house buyers. However, this is not a material planning consideration.</p>
<p>Less access for cycling and walking/ disruption to the PROW network.</p>	<p>The Environmental Statement (Chapter 12) includes an assessment of the impact on walkers and cyclists and outlines a proposal for the re-opening of currently closed PROWs, as well as the diversion of some to create what is considered will be a more commodious, more legible and inter-connected circular route around the site.</p>
<p>Concern the embankment would overshadow homes.</p>	<p>The earthworks, including the embankments have already been consented through the earlier Nant Helen Complementary Earthworks scheme.</p>
<p>Concern that the speeds the trains are tested at can cause danger to life – for example if the train derails and crashes into homes in Coelbren.</p>	<p>The test facility would have to be appropriately certified/regulated to be able to operate. Health and safety both on-site and the off-site receptors are expected to be core components of that licensing process.</p>

<b>Innovation for rail industry</b>	
Needed for future of the rail industry.	Noted and as explored in the Planning, Design and Access Statement and elsewhere in the submission, the proposal is a direct response to an unmet need expressed by the rail industry over many years.
Opportunity to be a World leader, at the cutting edge of the development of green/low carbon rolling stock for the future.	Agreed.
Current testing facilities are insufficient, in particular the availability of an electrified oval test track for long distance endurance accumulation and testing infrastructure sustainable energy solutions, signaling train detection systems and track adhesion monitoring.	Agreed.
Opportunity to deliver a lower carbon, digitally driven, more efficient and commercially competitive rail industry.	Agreed.
Opportunity for greater collaboration with bodies from outside the UK.	Agreed and the use of 'Global' is not used glibly/lightly. This facility has the potential to reach widely across the world.
Opportunity to consider whole system, whole life approach to decarbonising the rail sector - considering operational, maintenance and decommissioning aspects.	Agreed.
Opportunity to explore better digital connectivity to enable commuters to employ their travel time effectively.	Agreed.
Opportunity to introduce transformative technologies like digital signaling, driving a step-change in improving efficiency and effectiveness.	Agreed.
Opportunity for interdisciplinary involvement in the research to examine the various rail aligned technologies	Agreed.
Opportunity for research and testing in a broad range of other areas including integration of the transport system, ticketing, sharing of digital information and cybersecurity.	Agreed. The facility has the potential to expand its coverage of testing into new and different areas across the spectrum of industry operations.
Essential to investigate infrastructure resilience under extreme weather conditions.	Agreed.



Additional information south on the weight of rail to be used.	We confirm that the weight of rail to be used is likely to be 56kg/m for the sidings and 60kg/m likely to be specified for the test tracks.
<b>Traffic and transport</b>	
How will trains get to the test site – by rail or road? If they come up the branch line, what improvement works will be required to the line?	Trains could be transported to site by road or rail. The branch line is currently available for train access to the site, and we do not propose any major upgrades to the branch line. There may be a need to enhance safety at existing level crossings following risk assessment updates. The route clearance (bridges) will need to be reviewed in due course with potential for works should the necessary gauge not be available.
Concern about the traffic using the A4109 and detrimental impact on local villages – during construction and operation.	Through consultation with NPT it has been agreed that the A4109 (west of Dyffryn Cellwen) and A465 will be primary construction route. The same route is also identified as being the chose route should engines and rolling stock need to be transported by road. The A4109 route through Seven Sisters would not be utilised by heavy vehicles.
Concern about impact on A4067 – especially during construction which could start as early as 6am.	Through consultation with NPT it has been agreed that the A4109 (west of Dyffryn Cellwen) and A465 will be primary construction route. The same route is also identified as being the chose route should engines and rolling stock need to be transported by road. The A4067 route would not be the advised route and therefore an insignificant level of construction flow would use the link. Construction operating hours will be secured via condition but unlikely to start as early as 06:00 given the residential properties nearby.
Suggestion that all vehicles to the site to be directed along the A465.	This is our agreed and preferred approach.
What will happen to road link via washery bridge?	Onllwyn Road (north towards the A4221) will remain in place and with an unchanged alignment. Pedestrian

	footway from the junction with Wembley Avenue to the GDRE site will be introduced.
Need to support sustainable transport (active travel and public transport) to the site.	The Transport Assessment will set out measures to support both active travel and public transport. A framework Travel Plan document will also be developed as a supporting document and will outline measures that will be implemented to ensure the maximum level of journeys being made by modes other than the private car.
What will happen to the footpath through the washery site? This provides good pedestrian access to the local shop and post office.	This will be diverted/re-accommodated in the design as outlined in the application submission and Chapter 12 of the Environmental Impact Assessment
Improve national cycle network.	External routes are being investigated and connection to the NCN route 43 will be explored. Measures such as this will be detailed during the reserve matters process. As part of the proposal, there is the opportunity to straighten out the 'dog leg' section of the route alongside the site.
Ensure collaboration with the operators and local authorities to provide improved public transport services for the employees and the local community.	Consultation with local operators will be undertaken. Where practical and achievable improved public transport services will be included as part of the proposed development.
Concern about delays and road blockages caused by bringing trains in by road. Historic issues cited with turbine blades being transported through local road network.	The size of trains will be significantly less than the turbines at Maesgwyn Wind Farm. As well as the ability to utilise the rail line to deliver trains, a comprehensive Traffic Management Plan will be developed to be a living document for the life of the construction and operation of the facility. This document will outline the measures and mitigation that will be put into place to reduce the impact of deliveries made by road.
Concerns there are no passenger trains in the area and suggestion to provide access to the site by passenger trains	We are not proposing for the branch line to be used by passenger trains in the current arrangement. Any proposal to reinstate passenger traffic to the line is



and re-open the Neath and Brecon train lines – Dulais Valley railway.	likely to require significant infrastructure upgrade (with re-introduction of a junction at Neath, new stations and other infrastructure). This would need to be considered as a stand-alone project and would require discussions with Network Rail with regard to feasibility.
Need a Travel Plan for the site - mapping where employees and visitors live relative to the site and offering options for journey planning to maximise modal shift away from single occupancy car journeys wherever possible.	A Framework Travel Plan will be submitted as part of the planning application. A full Travel Plan taking into account the end user organisation's staff base will be secured via condition.
Develop a car sharing scheme.	This will be included as part of the package of measures put forward by the Framework Travel Plan.
<b>Noise</b>	
Concern expressed about the noise generated – during construction and operation.	<p>The Environmental Impact Assessment contains a comprehensive noise impact assessment which assesses noise (and vibration) during both construction and operational phases of the project, identifies impacts of significance and the mitigation for dealing with them (Chapter 10).</p> <p>For construction, contractors will be bound to operate under a code of good practice known as the Construction Environmental Management Plan. Best Practicable Means will be used to minimise noise from construction activities, including limits on working hours near to sensitive communities. For the operation of the facility, noise mitigation has been included in the scheme including noise barriers to the north, east and south of the test circuits.</p>
Is the proposed track a 'squeal track'?	We are not proposing a squeal track. Measures will be taken to minimise the occurrence of any possible 'squealing' noise (also known as curving noise) from the facility.
Suggestions that construction phase should not be started until the land has been put back, the remedial earthworks	There is a natural sequence to the implementation of the proposal as outlined in the submissions, which sees



<p>finished, and the sound sensor survey has been carried out.</p>	<p>the land restored alongside the implementation of the complementary earthworks proposals, which together prepares the sites for the GCRE development.</p> <p>Also, there will be a duty on the contractors building the scheme to use Best Practicable Means to minimise construction noise, regardless of the sound survey results.</p>
<p>Mitigation queries and soil barrier suggested to prevent noise during operation. Query as to whether some villagers would be compensated with double glazing to address noise impacts.</p>	<p>The noise and vibration assessments contained within the Environmental Impact Assessment (Chapter 10) propose a number of embedded and other mitigation to address noise, including noise barriers and soil earth 'bunds' which act as noise barriers.</p> <p>The assessments demonstrate that these measures would successfully mitigate noise such that compensation and/or off-site measures are not required.</p>
<p><b>Hours of operation</b></p>	
<p>Concern about the potential impact of 24/7 operation – in particular continuous noise and impact on residents and environment.</p>	<p>The ability to operate 24/7 will not mean that the facility will in fact operate 24/7. The Environmental Impact Assessment presents a set of operational assumptions in the early chapters which present a picture of how it is envisaged the facility will operate including hours and days of operation. Those assumptions have fed into the impact assessments such as for noise.</p>
<p>Suggestion that the facility should operate for the same hours and the opencast mining operation.</p>	<p>There is a need to tailor the operational requirements to the proposed facility as it is responding to the market and operational needs of a different market sector.</p>
<p><b>Environmental issues</b></p>	
<p>Air pollution/dust.</p>	<p>These are both assessed in depth in the Environmental Impact Assessment (Chapter 14) - both for the construction and operational phases of development.</p>

Vibration.	Vibration fades away very quickly with distance. Due to the distances of dwellings from the facility, there will be no vibration effects from the facility.
Light pollution - impact on Dark Sky Status. What mitigation measures will be put in place?	The Landscape and Visual Impact Assessment (Chapter 9 of the ES) and associated Appendix 9E includes an assessment of the nighttime context of the proposal. This contains measures to control the amount, type and operation of lighting given both the Dark Sky Reserve context and that of surrounding residential receptors.
Negative impact on the environment – especially contribution to climate change with use/testing of diesel engines.	The test facility will be almost wholly electrified. A key justification for the new facility is the testing of and research into new and alternative methods of traction power for rail. Decarbonisation of the railways will be one of the core objectives.
Loss of habitat/biodiversity – including impact on protected species and destruction of nationally and locally important peat bogs.	A full assessment on the effects of the project on biodiversity, including protected sites, habitats and species is presented with the Biodiversity chapter of the Environmental Statement (Chapter 7). This includes an assessment on the loss of bog habitats and presents associated mitigation and habitat enhancement measures.
Impact on ancient woodland.	Two areas of ancient woodland are mapped as being present within the site. As reported in the Biodiversity chapter of the Environmental Statement (Chapter 7), one of these is incorrectly mapped. The remaining area will be not be disturbed or lost as a result of the GCRE development and mitigation measures are included to avoid damage from pollution and other activities. No significant effects on ancient woodland will occur.
Impact on the local landscape and views from Brecon Beacons National Park.	The Landscape and Visual Impact Assessment (Chapter 9 of the ES) includes for a full assessment of the

	<p>landscape and views from the Brecon Beacons National Park.</p> <p>The photomontages provided represent the year 15 scenario where planting is established and provides its function of screening the development. Year 1 landscape and visual impacts, where planting is yet to be sufficiently established to fully mitigate effects after 15 year, are captured within the chapter.</p>
Visual impact of the development.	<p>There is a Landscape and Visual Impact Assessment contained within the Environmental Impact Assessment which builds on that undertaken as part the Nant Helen Complementary Earthworks consent and introduces the rail related infrastructure into the assessment. Structural landscaping and a masterplanned approach of containing all buildings associated with the scheme on the site of the existing Washery.</p>
Impact on nature and wildlife.	<p>A full assessment on the effects of the project on biodiversity, including protected sites, habitats and species is presented with the Biodiversity chapter of the Environmental Statement (Chapter 7). This includes an assessment of a range of project effects and presents details of proportionate mitigation and enhancement measures.</p> <p>With the inclusion of enhancement measures (as detailed in Section 7.24) an overall positive residual effect is predicted for some ecological features including wetland, marshy grassland and invertebrates.</p>
Impact on Scheduled Ancient Monuments – Claypon’s tramway. Importance of liaising with Cadw about proposals.	<p>Liaison with Cadw has taken place in the preparation of an application for Scheduled Monument Consent which will be submitted alongside the GCRE outline application. Measures are therefore embedded in the scheme to mitigate impact on the affected Scheduled Monument.</p>

<p>Concern about flooding and water flows from the site. What assessments have been undertaken? Concern about potential pollutants from surface water runoff into the surrounding area.</p>	<p>The drainage strategy describes the assessments undertaken on existing catchments and surface water flows, and how flows will be controlled during extreme rainfall events, taking into account the impact of global warming. The drainage strategy and water chapter of the ES describe how water quality will be controlled, including pollutants.</p>
<p>Drainage issues and pressure on existing pipework. One respondent cited a recent example where a landslip of the main roadway into Caehopkin occurred directly below Nant Helen - the road fell into an existing waterway, was closed for many months and still floods during heavy rain. Question location of embankment and ponds</p>	<p>The surface water drainage measures proposed control the flows from the site and reduce the rate of runoff before entering the existing watercourse. The ponds are an integral part of this control network. The nearest pond is located some 230m away from the nearest property in Caehopkin, the other side of the proposed embankment.</p>
<p>The village of Caehopkin has been saved from major flooding as the road down from Nant Helen acts as an extra waterway during heavy rainfall. Has this been taken into consideration and how will it be resolved?</p>	<p>The drainage proposals in this application and consented Complementary Earthworks application deals with the drainage from the proposed earthworks and rail track and considers and controls the drainage from that element. It is understood that the earlier Opencast Restoration application reduces the catchment and therefore the surface water run-off from the Nant Helen site.</p>
<p>Is the planned attenuation pond above Caehopkin still going to have a maximum volume of 3,550 cubic metres? Where will this drain to? How will the Sustainable Drainage Systems operate?</p>	<p>The attenuation pond located some 230m south of Caehopkin is designed to accommodate up to 3,550m<sup>3</sup> during an extreme rainfall event, including the effects of climate change. For the majority of the time, the pond will be empty and dry. Full details are discussed in the drainage strategy, however in essence surface water will be picked up from a series of ditches at the edges of the embankment and also from the track drainage, transmitted into the attenuation pond where outflows will be controlled via a hydraulic structure before discharge into the existing watercourses.</p>



<b>Loss of common land</b>	
Compensation for the loss of grazing rights.	Options for dealing with the existing common land are being assessed by Powys County Council on behalf of the project joint venture group with a view to agreeing a preferred option for consultation with graziers.
The need to restore the land to common land or provide alternative common land in the local vicinity.	Options for dealing with the existing common land are being assessed by Powys County Council on behalf of the project joint venture group with a view to agreeing a preferred option for consultation with graziers.
<b>Site considerations</b>	
Landform – concern about the height of the embankment, instability of the land and potential landslides.	This was considered and addressed during the Complementary Earthworks application. The embankment will be placed and compacted in layers, benched into the existing ground, with basal drainage measures and side slopes formed at a shallow gradient to ensure stability. Conditions have been included in the earthwork's application relating to the design and approval of the embankments.
Are there any changes to the proposed embankment above Caehopkin?	There are no changes to the proposed embankment from those submitted as part of the Complementary Earthworks application. There will be minor modifications at the top of the embankment to facilitate track construction.
Concern that extensive opencast mining and mountain terrain makes the geography and ground conditions unsuitable for the proposed development.	The previous uses as an opencast site together with the terrain has been taken into account to date and will be fully taken into consideration during the subsequent detailed design and approval process. The measures proposed are suitable for the site conditions.
Landform changes of this size should not be made for a possible project when they have not been geo-technically designed for that purpose.	The design of the earthworks has been undertaken by experienced geotechnical and civil engineering specialists and the measures proposed take into account the nature, scale and



<p>In Planning Policy Wales 10 (PPW) 6.9.13 states that when considering development proposals planning authorities should take into account the nature, scale and extent of surface and subsurface hazards which may pose risks to health and environment, to ensure that:</p> <ul style="list-style-type: none"> <li>• new development is not undertaken without an understanding of the risks, including those associated with the previous land use, pollution, groundwater, flood risk, subsidence, landslips, rock falls, mine and landfill gas emissions and rising groundwater from abandoned mines.</li> <li>• development does not take place without appropriate remediation or precautions.</li> </ul>	<p>extent of surface and subsurface hazards. Ground investigation is planned to confirm the conditions anticipated. These will continue to be taken into account at the subsequent detailed design stage.</p>
<p>Who will be responsible for maintaining the site and how will this be managed once the site is developed and operational?</p>	<p>The future owners and operators of the facility will be responsible for maintaining the site.</p>
<p>Concern that proposed facility will disrupt supply to local community.</p>	<p>Liaison has taken place with statutory authorities who will supply utilities to the site and measures to ensure adequate supply is available has been determined.</p>
<p>Can electricity for the project be obtained from local wind farms?</p>	<p>Electricity from wind farms is closely regulated and is normally fed into the existing electricity network under separate connection and tariff agreements.</p> <p>It may be possible to provide a direct connection but forming such a connection and gaining agreement may be challenging and costly.</p>
<p><b>Construction requirements</b></p>	
<p>Agree with the requirement for the Construction Environmental Management Plan (CEMP) to be agreed with the LA, prior to works commencing.</p>	<p>Noted.</p>



Construction and engineering works phases should be undertaken as part of the NAECI National Agreement. This agreement lays out best working practices, wage rates, including allowances and enhancements, plus it has a well-developed disputes process within it.	Noted.
<b>Detailed design</b>	
Needs a good landscape designer working alongside a good architect to design a straightforward but well-considered open parkland, industrial landscapes and buildings.	At reserved matters stage, post the granting of outline permission, the landscape and built form design will be progressed together to create an integrated detailed masterplan.
Concern that metal fences will destroy the landscape.	Given the application is in outline with all matters reserved, there is an opportunity to explore fencing solutions at subsequent design stages. The specification for any fencing will include the need to meet relevant standards or regulations for safety, security, design life and aesthetics.
Concern that the speed at which trains will be tested will cause a health and safety risk.	The proposed line speeds are commensurate with those on the UK rail network, and therefore any health and safety risk would be equivalent to the rest of the railway in the UK. In fact, as this is proposed to be a fully controlled and secure site, the health and safety risks should be less significant.
Suggest providing on-site interpretation to acknowledge/explain the Brecon Forest Tramroad.	This is forming part of the Scheduled Monument consent application to Cadw.
It was questioned whether 110mph test track is fast enough.	We investigated whether we could achieve a higher line speed on the larger loop, but to reach 125mph, for example, would have required a significantly larger loop which extended beyond the site boundaries.
<b>Working practices/training</b>	
The construction and engineering works phases should be undertaken as part of the NAECI National Agreement.	Noted.



This agreement lays out best working practices, wage rates, including allowances and enhancements, plus it has a well-developed disputes process within it.	
Contract & subcontract work from unionised employers locally and employers providing a high standard of employment as outlined by the fair work commission.	Noted.
Opportunity for deaf awareness training for rail staff.	Noted.
Staff will require new skills including basic digital skills, software engineering, data analytics, systems engineering, cyber security and resilience, and diagnostics and monitoring.	Noted.
<b>Community engagement</b>	
Need for ongoing engagement with the local community and share more information. Should also explore engagement with younger population to maximise the future sustainability of the proposal in terms of future employment opportunities.	Engagement will continue through the planning/consenting process and no doubt beyond into the implementation of the scheme as part of the detail design, construction and eventual operation of the facility.
Need for ongoing engagement with stakeholders – Design Commission for Wales, Cardiff University Engineering, Public Health Wales, Glamorgan and Gwent Archaeological Trust	Engagement will continue through the planning/consenting process and no doubt beyond into the implementation of the scheme as part of the detail design, construction and eventual operation of the facility.
Involve local residents in the decision-making progress – recommend a formal monitoring committee to minimise potential issues.	Noted.
Important to regularly monitor and report on impacts and safety.	Noted.
Residents need to be able to access monitoring of pollution online.	Noted.
<b>Consultation process</b>	
Concern was expressed about consulting during the pandemic as this	A fully compliant Pre-application Consultation process was carried in

<p>curbed potential for face-to-face meetings/events.</p>	<p>alignment with Welsh Government guidance in place at the time for the conduct of pre-application planning application consultation during the 'emergency period'.</p> <p>It should be noted, however, that face-to-face engagement is not a statutory requirement of the Pre-Application Consultation process (even before Covid restrictions).</p>
<p>Some members of the community unable to engage as self-isolating, lack of IT skills and no access to the internet.</p>	<p>There was an opportunity for consultees to request hard copies of the submissions during the consultation period, which some people did. There was also a telephone number for people to call if they did not have internet/computer access.</p>
<p>It was suggested that CAD visuals and models should have been produced to enable residents to understand the scheme.</p>	<p>The application is in outline with all matters reserved. As such, the details of the design are illustrative. A CGI video together with an illustrative masterplan and a suite of other plans were presented on the project webpage. Together with consultation in the locality at earlier stages of the scheme development give a clear picture of the component parts of the project.</p>
<p>Too many documents to decipher.</p>	<p>This is a major planning application supporting by a wide-ranging Environmental Impact Assessment. An application of this nature requires a large amount of reporting on the assessment work that underpins the proposal.</p> <p>A consultation document giving an overview of the proposals, the economic benefits and the key considerations as well as a non-technical summary of the Environmental Statement were also available on the consultation webpage.</p>
<p><b>Use of the facility</b></p>	
<p>This facility could become a testing ground for other countries.</p>	<p>Agreed.</p>



Access to the facility should be open to all on an equal basis.	The intention is for the facility to have open-market access.
<b>Site is unsuitable</b>	
Other suitable sites for the facility eg. Siemens in Scunthorpe.	It is understood that GCRE is the only test facility project of its kind being brought forward in the UK.
Inappropriate site.	The purpose of the planning application and the Environmental Impact Assessment process is to demonstrate the acceptability of the proposal on the site in planning terms. The rail industry has already firmly endorsed the suitability of it from an operational perspective, it is now for the determination of the planning application to determine suitability from a consenting perspective.
Use site for tourism and leisure purposes.	The proposal by Welsh Government is for a rail testing and validation facility.
Insufficient space to run up to 100+mph trains.	We can confirm that the line speeds proposed are achievable on the loops as designed.
<b>Project viability</b>	
How will the project be funded?	Welsh Government continues to explore financial and commercial options and opportunities, however, this is not a material planning consideration.
Who will own the site?	This is to be determined.
Need to ensure the longevity of the Centre	The facility is a long-term proposal, envisaged as having a 60-year operational life.
Need a competent, forward thinking operations company.	Agreed.
Will it come to Wales as alternative site near Scunthorpe?	It is understood that GCRE is the only test facility project of its kind being brought forward in the UK.
What additional assessment has been made of the market in the wider UK and internationally?	There is an Outline Business Case that has been prepared for the proposal by

	Welsh Government and submitted to UK Government.
<b>No development</b>	
Prefer if the woodland was regenerated	The proposal includes for additional woodland and tree planting.
Restore the site to its natural state.	The site will be restored prior to the re-use of part for the GCRE facility.

**Other comments:**

<b>Comments</b>	<b>Response</b>
Use of the term 'deprived community' objected to as many well qualified people in the area.	Noted, but this is a categorization from the Welsh Index of Multiple Deprivation 2019.
Embed the seven wellbeing goals into the development proposals.	The proposal responds well to both the goals and the ways of working as outlined in the submission.
To make sure it is equally spread between North and South.	Is this comment in respect of Wales or the UK?
Query as to when Celtic Energy will end its operation.	This is a matter for Celtic Energy and the relevant authorities, but it is known that coaling operations will cease in 2021.
Use the empty Coelbren Surgery as an office for construction phase.	Noted.

**Welsh Language:**

4.4.1. The feedback form asked about the effects of the proposed Global Centre of Rail Excellence could have on the Welsh language. Full details of the feedback are set out in Appendix 21.

4.4.2. The suggested positive effects included raising the profile of the Welsh language with bilingual signage, potential employment of local bilingual people and facilitation of bi-lingual meetings. Other were concerned that the project would have a negative impact on the Welsh language, as people would be employed from outside the area, who do not speak or understand the Welsh language and culture. It was suggested that Welsh culture and language awareness raising be delivered with all employees as well as offering opportunities to learn welsh.

## 5. Conclusion

- 5.1.1. An extensive engagement/consultation programme was undertaken on proposals for a Global Centre of Rail Excellence, with information posted to over 9,500 addresses in the local area and over 500 people participating in the process – by attending events during the early engagement and providing feedback to the two stages of engagement/consultation.
- 5.1.2. At each stage of engagement/consultation there was a high level of support for the proposal. The main positives highlighted were the wider economic benefits in terms of jobs for local people, training opportunities, boosting local tourism and support for the local supply chain. Other feedback stressed that the proposal offered a one-off opportunity for the area to support the regeneration of this brownfield site and showcase innovation in the rail industry.
- 5.1.3. Some people remain opposed to the principle of development on the site, preferring to see it restored to countryside and others expressed concerns, mainly in relation to environmental issues including noise, air pollution, vibration, light pollution traffic and visual impact, which could affect the amenity and well-being of those living in close proximity to the site.
- 5.1.4. Comments have been reviewed and considered and have been responded to through the planning application. Several additional surveys (including night-time survey and traffic surveys) have been undertaken as well as updating the outline Construction Environmental Management Plan (CEMP), Environmental Statement and Traffic Assessment to support the submission of the outline planning application.