



Pennant Walters

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# Glanllynfi Garth Wind Farm

Draft Planning Statement



July 2026

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## Report for

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Planning Statement

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## Document revisions

| No. | Details  | Date        |
|-----|----------|-------------|
| 1   | Draft PS | August 2026 |

# Executive Summary

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## Overview

This draft Planning Statement has been prepared on behalf of Pennant Walters Ltd by WSP UK Ltd (WSP) as one of a suite of documents supporting a planning application for the construction and operation of a wind farm of up to eight turbines on land to the east of Maesteg (referred to as the Proposed Development from hereon).

This draft Planning Statement aims to demonstrate the suitability of the Proposed Development in planning terms and it is submitted in support of an application to Planning and Environment Decisions Wales (PEDW), on behalf of the Welsh Government, as a Development of National Significance (DNS). The document has been informed by the findings of the draft Environmental Statement (ES), which presents the assessment of the likely significant environmental effects arising from the Proposed Development.

This draft Planning Statement:

- Provides a brief description of the Proposed Development including its site history and approach to the preparation of the application;
- Sets out the objectives of the Proposed Development with further design considerations set out in the accompanying Design and Access Statement (DAS);
- Reviews the planning policy framework, including Future Wales: The National Plan 2040, Bridgend County Borough Council (BCBC) Replacement Local Development Plan (RLDP) 2018 – 2033, Rhondda Cynon Taf Borough Council (RCTBC) Local Development Plan 2006 – 2021 and Neath Port Talbot County Borough Council (NPTBC) Adopted Local Development Plan 2011 – 2026 and sets out an assessment of the conformity of the scheme with the framework.

## Summary of accordance with planning policy

The draft Planning Statement identifies the primary role of Future Wales in the determination of DNS applications. Future Wales has development plan status, and, by law, DNS applications must be assessed against it. Future Wales includes two policies that provide the strategic and detailed policy wording for consideration of renewable and low carbon energy developments:

- Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure
- Policy 18 – Renewable and Low Carbon Energy Developments of National Significance

A detailed assessment of the Proposed Development against these policies is set out in **Section 4.9** of this draft Planning Statement. **Section 4.9** also sets out a detailed assessment of the compliance with the BCBC, RCTBC and NPTBC LDPs. These assessments are informed by the findings of the draft ES.

An assessment of the benefits of the Proposed Development, in terms of renewable energy provision, and the adverse environmental impacts, as assessed in the accompanying draft ES, has been undertaken in this draft Planning Statement. Overall, the Proposed Development is considered to accord with Policy 17 and Policy 18 of Future Wales. It is considered that the planning balance weighs heavily in favour of the Proposed Development.

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# 1. Introduction

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## 1.1 Overview

- 1.1.1 This draft Planning Statement has been prepared on behalf of Pennant Walters Ltd by WSP UK Ltd (WSP) to support a planning application for the construction and operation of a wind farm comprising up to eight wind turbines across two parcels of land on land to the east of Maesteg (the 'Wind Farm Site'). The Wind Farm Site is located predominantly within the administrative boundary of Bridgend County Borough Council (BCBC). The access to the Wind Farm Site from the public highway will be achieved via access tracks which traverse the Rhondda Cynon Taf County Borough Council (RCTCBC) and Neath Port Talbot Council (NPTC) authority areas. Together the Wind Farm Site and access tracks form the planning application site.
- 1.1.2 This draft Planning Statement has been prepared to demonstrate the suitability of the Proposed Development in planning terms. It has been prepared as part of a suite of documents to support the process of pre-application consultation prior to the submission of the final proposals to Planning and Environment Decisions Wales (PEDW) on behalf of the Welsh Government for consent as a Development of National Significance (DNS).
- 1.1.3 This draft Planning Statement should be read in conjunction with the accompanying draft Design and Access Statement (DAS), which sets out the approach taken to the design and access of the Proposed Development, and the draft Environmental Statement (ES), which sets out the likely significant effects of the Proposed Development.

## 1.2 Purpose of the Planning Statement

- 1.2.1 The purpose of this draft Planning Statement is to:
- Provide a brief description of the Proposed Development including its site history and approach to the preparation of the proposal;
  - Set out the objectives of the Proposed Development and other design considerations;
  - Explain the benefits of the Proposed Development in the context of need for renewable energy and summarise the overall environmental performance of the scheme; and
  - Review the planning policy framework and set out the conformity of the scheme with the framework.

## 1.3 Pre-Application Consultation

- 1.3.1 As the Proposed Development is a DNS, in accordance with Paragraph 3.23 of Developments of National Significance: Procedural Guidance (The Planning Inspectorate, 2024)<sup>1</sup> this draft Planning Statement has been prepared to allow consultees an opportunity to comment on its contents, and for the Applicant to consider and respond to any comments received.

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<sup>1</sup> Welsh Government (2024) Developments of National Significance (DNS): Procedural Guidance. (Online) Available at: [Developments of national significance \(DNS\): procedural guidance \[HTML\] | GOV.WALES](#) (Accessed June 2026).

- 1.3.2 Following consultation and a review of responses received, a final Planning Statement will be prepared prior to final submission to PEDW. A Pre-Application Consultation (PAC) Report will also be prepared and submitted with the application.

## 1.4 Structure of the Planning Statement

1.4.1 The remainder of the document provides the following information:

- **Section 2** - Provides a description of the applicant, the application site, the Proposed Development, planning history and Environment Impact Assessment (EIA) approach;
- **Section 3** - considers the need for the development, the issues of climate change and security of supply and as a consequence the pressing need for renewable energy. The section demonstrates how the Proposed Development could make a contribution to reducing the effect of climate change and improving security of supply;
- **Section 4** - this section summarises the national and local policy context and analyses how the scheme performs against national planning policy requirements. It also sets out how the scheme performs against the CCBC Local Development Plan (LDP) and any other material considerations; and
- **Section 5** - concludes how the scheme meets the planning policy requirements through application of the planning balance.

## 2. Overview of the Proposed Development

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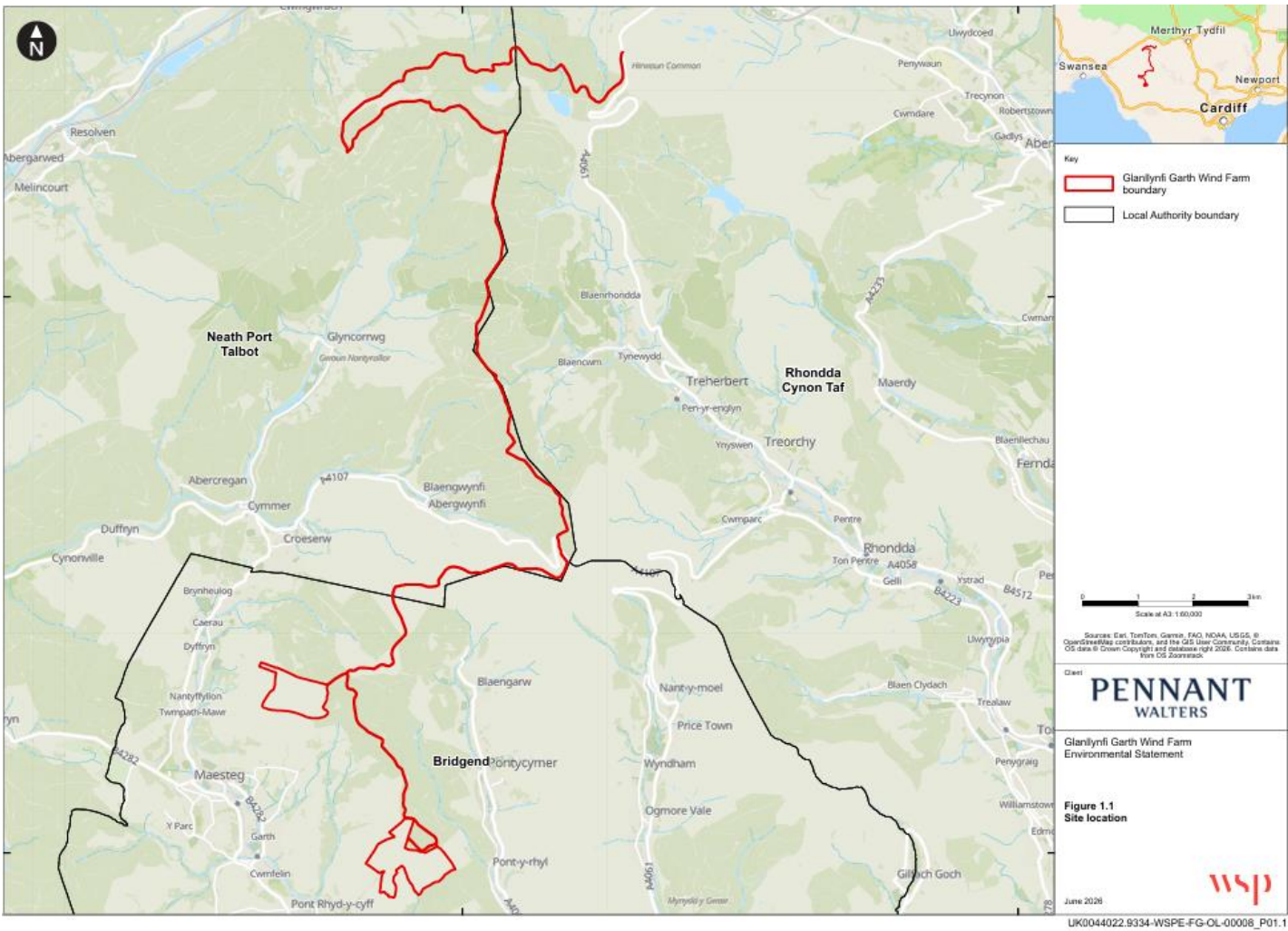
### 2.1 The Applicant

- 2.1.1 Pennant Walters Ltd (the Applicant) is seeking planning permission for the construction and operation of a wind farm of up to eight turbines on two parcels of land to the east of Maesteg.
- 2.1.2 Based in Hirwaun, southeast Wales, Pennant Walters Ltd is a Walters Group company with a focus on renewable energy having developed a wide variety of schemes including onshore wind, solar, small scale hydro and battery storage. The Walters Group is a Welsh company.

### 2.2 The Site

- 2.2.1 The Proposed Development will be located across two parcels of land, which together form the Wind Farm Site, the location of which is identified below:
- Pwll-yr-lwrch (hereafter 'Northern Array') – Central Grid Reference SS 87102 92887; and
  - Cynhordy (hereafter 'Southern Array') – Central Grid Reference SS 88988 89854.
- 2.2.2 The Northern Array is located on the upper slopes of Mynydd Pwll-yr-Lwrch, at elevations of approximately 390m – 410m Above Ordnance Datum (AOD), whilst the Southern Array is located on the slopes of Moel Cynhordy at elevations of approximately 290m – 345m AOD. The land parcels comprise a mix of semi-improved grassland, marshy grassland and heathland. The Nant Cwmdru valley is located between the two land parcels with coniferous forests located towards the upper parts of the valley and deciduous woodland in the southern part of the valley. There are also extensive coniferous forests to the north (Caerau Forest) and east (Garw Forest) of the Wind Farm Site. To the west lies the Llynfi Valley in which the town of Maesteg is located and to the east, the Garw Valley where the villages of Blaengarw and Pontycymer are located.
- 2.2.3 Access to the Wind Farm Site would be achieved via existing access tracks which serve the operational Pen y Cymoedd Wind Farm and Llynfi Afan Wind Farm. Starting north at the A4061, the access tracks travel south through Pen y Cymoedd Wind Farm, then cross the A4107 and travel through the Llynfi Afan Wind Farm.
- 2.2.4 With regard to Public Rights of Way (PRoW), footpath MAE/4/2 adjoins the eastern boundary of the Northern Array and footpath MAE/59/1 crosses the northwestern corner of the Northern Array. Within the Southern Array, bridleway GWV/30/1 traverses the western part of the land parcel and Footpath GWV/29/1 crosses the southeastern part of the Southern Array and continues along the boundary. Footpath GWV/36/2 also runs along the northwestern part of the Southern Array.
- 2.2.5 There are no residential properties within the Wind Farm Site boundary however there are several residential properties within close proximity to the two land parcels (Northern and Southern Array). The nearest settlement is Maesteg, the outskirts of which are approximately 1km to the west of the Northern Array and 1.5km west of the Southern Array.

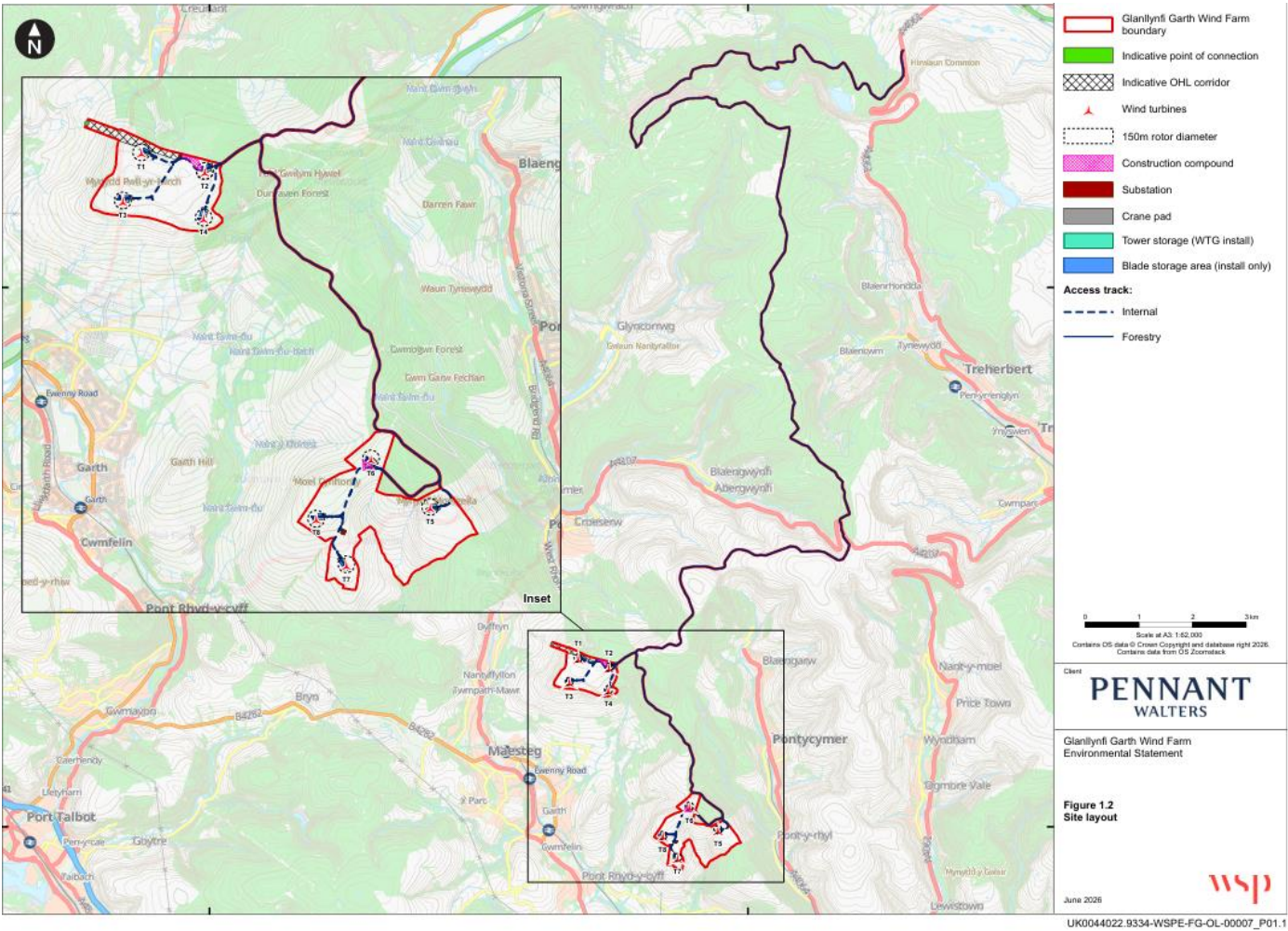
Figure 2.1 Site Location



## 2.3 The Proposed Development

- 2.3.1 The Proposed Development is to construct and operate a wind farm consisting of a maximum of eight wind turbines, each with a three-bladed rotor with a diameter of up to 150m, a hub height of up to 105m and maximum height to blade tip of 180m. The Proposed Development will be located across two land parcels referred to as the 'Northern Array' and 'Southern Array'.
- 2.3.2 The layout of the Proposed Development has been chosen because it balances high productivity with the environmental sensitivities present at the Wind Farm Site.
- 2.3.3 The Proposed Development will be designed with an operational life of 30 years. At the end of this period the Applicant has three options; to decommission the wind farm and dismantle and remove the turbines; to apply for an extension to the operating period using existing equipment; or apply to install new equipment on the Wind Farm Site. For the purposes of this Statement, it is assumed that the wind farm would be decommissioned.
- 2.3.4 The Proposed Development consists of the following elements:
- Two substations including transformer housing;
  - Two temporary construction compounds;
  - Two temporary site offices;
  - Crane pads and cabling;
  - Access track construction; and
  - Overhead line connection (via wooden pole) to agreed Points of Connection (POC) with National Grid Electricity Distribution (NGED).
- 2.3.5 The Proposed Development is located predominantly within a Pre-Assessed Area (PAA) for Wind Energy as defined in the National Development Framework (NDF) – Future Wales: the National Plan 2040 (PAA 9). However, a portion of the Southern Array, comprising two out of the four turbines, is located outside of the PAA.
- 2.3.6 The Proposed Development will require two grid connection points and individual substations within each parcel. The Northern Array will connect to the 66kv Overhead line that runs adjacent to the western extents of the parcel. The Southern Array will connect to the 66kv Overhead line that traverses the centre of the parcel. It is envisaged that each PoC will be achieved via a short overhead line. Both connections have been identified through discussions with National Grid Electricity Network (NGED) and form part of the EIA assessment.
- 2.3.7 Traffic related to the Proposed Development would travel on the A465 and A4601 before using the Forestry access tracks to access the Wind Farm Site. Access to the Wind Farm Site will be achieved via existing access tracks which serve the operational Pen y Cymoedd Wind Farm and the Llynfi Afan Wind Farm. The Proposed Development will require the access tracks to be upgraded. At this stage, surveys, assessment and design in relation to the forestry access track are ongoing. The identification of the required upgrades along the route, together with an assessment of environmental effects will be presented in the final ES.
- 2.3.8 The layout of the Wind Farm Site is contained in **Figure 2.2**. A full description is provided in draft **ES Chapter 4: Description of the Proposed Development** provided with this application.

Figure 2.2 Site Layout



## 2.4 Planning History

- 2.4.1 Relevant planning history within the Wind Farm Site relates to two approved planning consents for anemometer masts (one in each array parcel):
- Application reference P/25/43/FUL: The installation of a 90m high anemometer mast for a temporary period of up to three years. Land at Cynhordy 1.6km east of Maesteg and 2km west of Pont-y-Rhyl. Approved 02 October 2025.
  - Application reference P/25/41/FUL: The installation of a 90m high anemometer mast for a temporary period of up to three years. Land at Pwll Yr Lwrch (1.7km to east of Maesteg and 3km west of Blaengarw) Maesteg. Approved 02 October 2025

## 2.5 Environmental Impact Assessment

- 2.5.1 Under Regulation 4A of The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) (Amendment) Regulations 2016, consent was required from the Welsh Ministers for the construction and operation of all energy generation projects between 10MW and 350MW. Although the Infrastructure (Wales) Act 2024 introduced a new infrastructure consenting process on 15 December 2025 replacing consents under the Town and Country Planning Act 1990 (Developments of National Significance), the DNS consenting route remains applicable to the Proposed Development by virtue of the relevant transitional and saving provisions set out in Section 146 of the Act. These provisions ensure that projects which meet the transitional criteria continue to be considered under the DNS regime, notwithstanding the introduction of the new consenting framework. As such, the Proposed Development is appropriately considered under the DNS process, with the application to be determined by the Welsh Ministers in accordance with established DNS procedures and guidance.
- 2.5.2 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) ('the EIA Regulations' from here on) apply to DNS applications. The Proposed Development falls within Schedule 2, paragraph 3(i) (*"Installations for the harnessing of wind power for energy production (wind farms)"*) due to exceeding the threshold for both the planning application site area and hub height. For all Schedule 2 developments where it is decided that the particular development may have significant effects on the environment, whether on account of its nature, scale or location, an EIA is required.
- 2.5.3 A Scoping Report was prepared to identify the potentially significant environmental effects of the Proposed Development that needed to be assessed further and to outline the approach to undertaking the assessments of these effects and submitted to Planning and Environment Decisions Wales (PEDW) on 02 March 2026. The report enabled statutory and non-statutory organisations and others with an interest in the Proposed Development ('stakeholders') to comment on the proposed scope of the assessment.
- 2.5.4 Drawing on the consultation responses and previous and subsequent assessment work, the draft ES reports the findings of an assessment of the potentially significant environmental effects of the Proposed Development. This reflects the requirement of the EIA Regulations for the ES to discuss in depth only those effects that are likely to be significant.
- 2.5.5 The draft ES should be read in conjunction with this draft Planning Statement, the draft DAS and other application documents.

## 3. Energy Policy

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### 3.1 Background

- 3.1.1 There are a range of legislative, regulatory and policy imperatives that embed the need to reduce carbon emissions and increase the renewable energy capacity of Wales and the UK. This section therefore sets out the broad support for the development of proposals for renewable energy.

### 3.2 International Agreements

#### The Kyoto Protocol 1997<sup>2</sup>

- 3.2.1 The Kyoto Protocol sought to bind countries to limiting and then reducing the quantity of their greenhouse gases produced. The United Kingdom (UK) signed up to the Kyoto Protocol binding itself to ensuring it reduces its greenhouse gases produced to being 12.5 percent below base-year levels (1990 levels) at the end of the first commitment period (2008-2012)<sup>3</sup>. Whilst the Kyoto Protocol and its commitments are old, it demonstrates the UK's commitment to meeting and exceeding international greenhouse gas reduction targets and renewable energy is key to achieving such targets.

#### Paris Agreement 2015<sup>4</sup>

- 3.2.2 The UNFCCC is the major international body responsible for managing climate change and carbon emissions. In 2015, parties to the UNFCCC adopted the Paris Agreement, the aims of which are stated as: *"This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by: a) Holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change; and (b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production."*
- 3.2.3 The Agreement requires participating countries to set and periodically update their own emissions reduction targets through Nationally Determined Contributions (NDCs). While these targets are not directly enforceable internationally, they form the basis of national policy commitments aimed at achieving net zero emissions.

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<sup>2</sup> United Nations (1997). The Kyoto Protocol. (Online) Available at: [https://unfccc.int/kyoto\\_protocol#:~:text=In%20short%2C%20the%20Kyoto%20Protocol,accordance%20with%20agreed%20individual%20targets](https://unfccc.int/kyoto_protocol#:~:text=In%20short%2C%20the%20Kyoto%20Protocol,accordance%20with%20agreed%20individual%20targets). (Accessed June 2026).

<sup>3</sup> DEFRA (no date). The United Kingdom's Report on Demonstrable Progress under the Kyoto Protocol. (Online) Available at: <https://unfccc.int/resource/docs/dpr/uk1.pdf> (Accessed June 2026).

<sup>4</sup> United Nations Framework Convention on Climate Change (2015). Paris Agreement. (Online) Available at: [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf) (Accessed June 2026).

## Glasgow Climate Pact 2021<sup>5</sup>

- 3.2.4 The Conference of the Parties (COP 26) under the UNFCCC held in Glasgow in November 2021, resulted in almost 200 countries agreeing on: the acceleration of action on climate change this decade to reduce emissions (mitigation); helping those already impacted by climate change (adaption); enabling countries to deliver on their climate goals (finance); and working together to deliver even greater action (collaboration). This agreement is in the form of the Glasgow Climate Pact which reaffirms the long-term goal to limit global warming to 1.5°C above pre-industrial levels and resolves to pursue efforts to achieve this, recognising that limiting global warming to 1.5°C *“requires rapid, deep and sustained reductions in global greenhouse gas emissions, including reducing global CO<sub>2</sub> emissions by 45% by 2030 relative to the 2010 level and to net zero around mid-century, as well as deep reductions in other greenhouse gases”*.

## 3.3 Acts of Parliament and Regulations

### Climate Change Act 2008 (as amended)<sup>6</sup>

- 3.3.1 One of the key provisions of the original 2008 Act was the introduction of legally binding targets on GHG emissions comprising reductions of at least 80% GHG emissions by 2050, and reductions in emissions of at least 26% by 2020, against a 1990 baseline. The Climate Change Act 2008 (2050 Target Amendment) Order 2019<sup>7</sup> came into force on 27 June 2019. This amended the legally binding target to reduce GHG emissions set in section 1 of the Climate Change Act 2008 from 80% to 100% against a 1990 baseline, achieving ‘net zero’ emissions. The Act also requires the Government to establish 5-year carbon budgets. The generation of electricity by renewable means such as wind energy is considered to be a key contributor towards meeting these targets.

### The Carbon Budgets Order 2009<sup>8</sup>

- 3.3.2 This legislation implements the carbon budgets set out in the Climate Change Act 2008. The budgets require the UK to continually reduce emissions in line with the carbon reduction commitments established under the Climate Change Act. The carbon budgets are:
- First carbon budget, 2009 to 2012, 3,018 mega tonnes carbon dioxide equivalent (MtCO<sub>2</sub>e) representing 25% reduction below 1990 levels;
  - Second carbon budget, 2013 to 2017, 2,782 MtCO<sub>2</sub>e representing 31% reduction below 1990 levels;
  - Third carbon budget, 2018 to 2022, 2,544 MtCO<sub>2</sub>e representing 37% reduction below 1990 levels by 2020;
  - Fourth carbon budget, 2023 to 2027, 1,950 MtCO<sub>2</sub>e representing 51% reduction below 1990 levels by 2025;

<sup>5</sup> United Nations Framework Convention on Climate Change (2021). COP26 The Glasgow Climate Pact. (Online) available at: <https://ukcop26.org/wp-content/uploads/2021/11/COP26-Presidency-Outcomes-The-Climate-Pact.pdf> (Accessed June 2026).

<sup>6</sup> UK Government (2008). Climate Change Act 2008. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents> (Accessed June 2026).

<sup>7</sup> UK Government (2019). The Climate Change Act 2008 (2050 Target Amendment) Order 2019. (Online) Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111187654> (Accessed June 2026).

<sup>8</sup> UK Government (2009). The Carbon Budgets Order 2009 (Online) Available at: <https://www.legislation.gov.uk/uksi/2009/1259/contents/made> (Accessed June 2026).

- Fifth carbon budget, 2028 to 2032, 1,725 MtCO<sub>2</sub>e representing 57% reduction below 1990 levels by 2030; and
- Sixth carbon budget, 2033 to 2037, 965 MtCO<sub>2</sub>e representing a 78% reduction below 1990 levels by 2035.

## The Energy Act 2008<sup>9</sup>, 2011<sup>10</sup>, 2013<sup>11</sup>, 2016<sup>12</sup>, 2023<sup>13</sup>

- 3.3.3 The Energy Act (2008) implemented the legislative aspects of the 2007 Energy White Paper. The content of the Bill included strengthening the Renewables Obligation to drive greater and more rapid deployment of renewables in the UK. The Energy Act (2011) sought to increase investment in energy efficiency whilst the Energy Act (2013) put in place measures to reform the UK energy market to attract investment. The Energy Act (2016) formally established the Oil and Gas Authority as a regulator for that sector whilst it signalled the closure of the Renewables Obligation for onshore wind. More recently, the Energy Act (2023)<sup>13</sup> has introduced further measures to support energy security and the transition to a low-carbon energy system.

## Well-Being of Future Generations (Wales) Act 2015<sup>14</sup>

- 3.3.4 This Act places a duty on public bodies (including Local Authorities) to carry out sustainable development. The Act puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. The wellbeing goals are:
- A prosperous Wales;
  - A resilient Wales;
  - A healthier Wales;
  - A more equal Wales;
  - A Wales of cohesive communities;
  - A Wales of vibrant culture and thriving Welsh language; and
  - A globally responsible Wales.
- 3.3.5 The wellbeing goals act together to ensure outcomes across economic, environmental, social and cultural sustainability strands. The Act defines sustainable development in Wales as *“The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”*

<sup>9</sup> UK Government (2008). Energy Act 2008. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2008/32/contents> (Accessed June 2026).

<sup>10</sup> UK Government (2011). Energy Act 2011. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2011/16/contents> (Accessed June 2026).

<sup>11</sup> UK Government (2013). Energy Act 2013. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2013/32/contents> (Accessed June 2026).

<sup>12</sup> UK Government (2016). Energy Act 2016. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2016/20/contents> (Accessed June 2026).

<sup>13</sup> UK Government (2023). Energy Act 2023. (Online) Available at: [Energy Act 2023](#) (Accessed June 2026).

<sup>14</sup> UK Government (2015). Well-being of Future Generations (Wales) Act 2015. (Online) Available at: <https://www.futuregenerations.wales/wp-content/uploads/2017/02/150623-guide-to-the-fg-act-en.pdf> (Accessed June 2026).

- 3.3.6 One of the wellbeing goals – achieving a prosperous Wales – specifically recognises the benefits of developing a low carbon society that recognises the limits of the environment and uses resources efficiently.

### Planning (Wales) Act 2015<sup>15</sup> and the Developments of National Significance (Wales) Regulations 2016 (as amended)<sup>16</sup>

- 3.3.7 The Planning (Wales) Act 2015 and the Developments of National Significance (Wales) Regulations 2016 (as amended), together with subsequent amendments, establish the statutory basis for the Developments of National Significance (DNS) regime. Under this framework, proposals for electricity generating stations with a capacity between 10 MW and 350 MW fall within the DNS system and require determination by the Welsh Ministers.
- 3.3.8 While the Infrastructure (Wales) Act 2024 has introduced a new consenting regime for significant infrastructure projects from 15 December 2025, the DNS regime continues to apply to certain projects by virtue of the relevant transitional and saving provisions. In particular, Section 146 of the 2024 Act, together with the Infrastructure Consent (Pre-Application and Application Procedure and Transitional Provisions) (Wales) Regulations 2025, enables qualifying projects to continue to be progressed and determined under the existing DNS framework

### Environment (Wales) Act 2016 (as amended)<sup>17</sup>

- 3.3.9 The Environment (Wales) Act 2016 (as amended) places a duty on the Welsh Ministers to reduce GHG emissions in Wales by at least 100% in 2050<sup>18</sup>. The target of net zero emissions (rather than 80% as originally stated in the Act) reflects the Welsh Government's acceptance of the independent CCC recommendation<sup>19</sup> that Wales could achieve a net zero reduction in emissions, which had previously been considered unfeasible. The Environment (Wales) Act 2016 (as amended) requires Ministers to set a series of interim targets and five-year carbon budgets to achieve the 2050 target. For 2021-26 this stands at 37% reduction compared to the baseline and for 2026-30 this is set at an average of a 58% reduction<sup>20</sup>.
- 3.3.10 These targets establish a clear trajectory for emissions reduction in Wales and provide a framework within which the development of renewable energy infrastructure, including wind energy, is expected to contribute to achieving statutory climate change objectives.

### Wales Act 2017<sup>21</sup>

- 3.3.11 The Wales Act 2017 sets out a number of changes to the model of devolution and provides further powers for the Welsh Government. Amongst its provisions, decisions are devolved for energy planning development consent for projects up to 350MW onshore and offshore in Welsh waters. The Act effectively removes the Secretary of State's power under the Planning Act 2008 to grant development consent in relation to electricity generating stations,

<sup>15</sup> UK Government (2015). Planning (Wales) Act 2015. (Online) Available at: <https://www.legislation.gov.uk/anaw/2015/4/contents> (Accessed June 2026).

<sup>16</sup> UK Government (2016). The Developments of National Significance (Wales) Regulations 2016. (Online) Available at: <https://www.legislation.gov.uk/wsi/2016/56/contents> (Accessed June 2026).

<sup>17</sup> UK Government (2016). Environment (Wales) Act 2016. (Online) Available at: <https://www.legislation.gov.uk/anaw/2016/3/contents> (Accessed June 2026).

<sup>18</sup> The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021 changed the statutory target within the Environment Act from 80% to 100% and came into force on 12 March 2021.

<sup>19</sup> Climate Change Committee's (2020) The path to Net Zero and progress on reducing emissions in Wales.

<sup>20</sup> The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021 amended the 2021-2025 carbon budget from an average reduction of 33% to 37% lower than the baseline and came into force on 19 March 2021. The regulations set the carbon budget for the 2026-2030 period and limit to an average of 58% lower than the baseline.

<sup>21</sup> UK Government (2017). Wales Act 2017. (Online) Available at: <https://www.legislation.gov.uk/ukpga/2017/4/contents> (Accessed June 2026).

up to those of 350MW (with no limit for onshore wind). Such projects are effectively transferred into the Town and Country Planning Act (TCPA) regime in Wales, if they are located onshore.

## Infrastructure (Wales) Act 2024<sup>22</sup>

- 3.3.12 The Infrastructure (Wales) Act 2024 received Royal Assent in June 2024 and introduces a new framework for consenting significant infrastructure projects in Wales. The Act establishes a single infrastructure consenting regime which replaces the Developments of National Significance (DNS) process and other existing consenting regimes.
- 3.3.13 The new regime came into force on 15 December 2025, supported by a suite of secondary legislation setting out detailed procedural requirements. This includes regulations covering pre-application procedures, application requirements, examination and decision-making, compulsory acquisition and fees.
- 3.3.14 In addition, the Welsh Government has published a range of supporting guidance documents to assist with implementation of the new regime. This includes guidance on the overall infrastructure consenting process<sup>23</sup>.
- 3.3.15 Transitional provisions apply to projects already progressing under the DNS regime. Where specified criteria are met, such projects may continue to be considered and determined under that regime.

## The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017<sup>24</sup>

- 3.3.16 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (EIA Regulations) apply to applications falling under the DNS regime. The EIA Regulation Schedules define the applicability of the regulations. EIA development is defined as either:
  - Schedule 1 development; or
  - Schedule 2 development, which is considered to be “*development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.*”
- 3.3.17 In the context of the Proposed Development, Schedule 2 is the relevant schedule. In particular, paragraph 3(i) (“*Installations for the harnessing of wind power for energy production (wind farms)*”) provides the relevant thresholds against which the applicability of EIA regulations is assessed. The Proposed Development subject to this ES qualifies as EIA development due to it being above the threshold for quantum (set at more than 2 turbines) and hub height (being more than 15 metres).
- 3.3.18 Schedule 4(3) sets out the requirements for the assessment to be included in the ES: “*A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic*

<sup>22</sup> Welsh Government (2024) Infrastructure (Wales) Act 2024. Available at: <https://www.gov.wales/first-minister-seals-first-act-in-office-ensuring-wales-is-more-attractive-to-infrastructure-projects> (Accessed June 2026).

<sup>23</sup> Welsh Government (2025) Significant Infrastructure Projects (SIP): guidance. Available at: [Significant infrastructure projects \(SIP\): guidance | GOV.WALES](https://gov.wales/significant-infrastructure-projects-sip-guidance) (Accessed June 2026)

<sup>24</sup> UK Government (2017). The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. (Online) Available at: <https://www.legislation.gov.uk/wsi/2017/567/contents> (Accessed June 2026).

*factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.”*

### 3.4 UK Wide Strategies and Plans

#### UK Renewable Energy Strategy (2009) <sup>25</sup>

- 3.4.1 The UK Renewable Energy Strategy (HM Government, 2009) outlined the UK's commitment to source 15% of energy from renewable sources by 2020, whilst reducing its fossil fuel consumption by 10% and gas imports by 20-30%. The aim was to generate more than 30% of the UK's electricity needs, 12% of its heating needs and 10% of its transport energy with renewables. The strategy put in place the financial mechanisms necessary for the advancement of these goals with around £30 billion to be invested between 2009 and 2020. The Strategy was supported by the Renewable Energy Action Plan and Road Map which sought to increase onshore wind capacity.
- 3.4.2 In 2020, 13.6% of final energy consumption in the UK was generated by renewables, below the 15% target. Of the total electricity generated, renewable electricity amounted to 43.1% (BEIS, 2021)<sup>26</sup> Digest of UK Energy Statistics (DUKES): renewable sources of energy).

#### Clean Growth Strategy (2017)<sup>27</sup>

- 3.4.3 The key message of the Clean Growth Strategy (CGS): Leading the Way to a Low Carbon Future (BEIS, 2017) is that clean growth means growing our national income while cutting GHG emissions. The CGS sets out a comprehensive set of policies and proposals that aim to accelerate the pace of 'clean growth' i.e., deliver increased economic growth and decreased emissions. The Strategy draws on the UK's commitments under the Climate Change Act 2008 and the associated 'Carbon Budgets'.

#### Industrial Strategy (2017)<sup>28</sup>

- 3.4.4 The Industrial Strategy (2017) identified “Clean Growth” as one of four Grand Challenges, supporting the development of low carbon technologies and infrastructure. While it has since been superseded by more recent policy frameworks, it reflects the UK Government's long-standing commitment to the transition to a low carbon economy. Net Zero – The UK's Contribution to Stopping Global Warming 2019<sup>29</sup>
- 3.4.5 This report sets out a number of key findings including: the Committee on Climate Change (CCC) recommendation of a new emissions target for the UK: net-zero greenhouse gases by 2050 (acted upon by The Climate Change Act 2008 (2050 Target Amendment) Order

<sup>25</sup> HM Government (2009). The UK Renewable Energy Strategy. (Online). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228866/7686.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf) (Accessed June 2026).

<sup>26</sup> Department for Business, Energy and Industrial Strategy (BEIS) (2021). Digest of UK Energy Statistics (DUKES): renewable sources of energy. (Online) Available at: <https://www.gov.uk/government/statistics/digest-of-uk-energy-statistics-dukes-2021> (Accessed June 2026).

<sup>27</sup> HM Government (2017). The Clean Growth Strategy. Leading the way to a low carbon future. (Online) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/700496/clean-growth-strategy-correction-april-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf) (Accessed June 2026).

<sup>28</sup> HM Government (2017). Industrial Strategy. Building a Britain fit for the future. (online) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf) (Accessed June 2026).

<sup>29</sup> Climate Change Committee (2019) Net Zero – The UK's contribution to stopping global warming. (Online) Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> (Accessed June 2026).

2019). For Wales, the report recommended a 95% reduction in the amount of greenhouse gases it produces by 2050. Subsequently, the Welsh Government has adopted a 100% reduction (net zero) target.

### National Infrastructure Strategy (2020)<sup>30</sup>

- 3.4.6 The National Infrastructure Strategy (HM Treasury, 2020) sets out the UK Government's approach to deliver significant improvements to UK infrastructure which will enable economic growth and progress towards the net zero by 2050 ambition.
- 3.4.7 At page 51 the strategy recognises the need to increase capacity from onshore wind: *"To deliver net zero, the share of generation from renewables needs to dramatically increase. While the UK leads the world in the deployment of offshore wind, greater generation capacity will need to come from onshore wind and solar as well."*

### Net Zero Strategy: Build Back Greener (2021)<sup>31</sup>

- 3.4.8 The Net Zero Strategy: Build Back Greener (BEIS, 2021) provides the overarching UK wide strategy to reach the UK's target for net zero emissions in 2050. The strategy set outs a delivery pathway to achieve net zero in 2050 with policies and proposals to keep the UK on track for emissions reductions targets to up to the sixth carbon budget covering the period 2033-2037. Amongst its policies, the strategy seeks to fully decarbonise the UK power system by 2035. Key to achieving this is the commitment to *"transform (the UK's) energy system away from fossil fuels to low carbon sources of energy, such as renewable electricity generated in the UK"* (page. 39).

### British Energy Security Strategy (2022)<sup>32</sup>

- 3.4.9 The British Energy Security Strategy (BEIS, 2022) provides the overarching UK wide strategy to accelerate the transition away from oil and gas, providing a Ten-point plan for the green industrial revolution. Amongst its strategy, it supports the work underway by the Welsh Government, Ofgem and networks to improve grid connections for onshore wind developments.

### Powering Up Britain – March 2023 Energy Security Secretary Statements<sup>33</sup>

- 3.4.10 On 30th March 2023, the UK Government announced a commitment and drive to improve the energy market and energy security within Britain. The Energy Security Secretary identified billions of pounds of additional funding would be provided to the industry in order to develop and implement more green energy development. The fifth round of Contracts for Difference has a budget of £205 million to directly provide support for the development of renewable energy within Britain. The main Powering Up Britain document identified that

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<sup>30</sup> HM Treasury (2020). National Infrastructure Strategy. Fairer, faster, greener. (online) Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/938539/NIS\\_Report\\_Web\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938539/NIS_Report_Web_Accessible.pdf) (Accessed June 2026).

<sup>31</sup> HM Government (2021). Net Zero Strategy: Build Back Greener. (Online). (Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033990/net-zero-strategy-beis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf) (Accessed June 2026).

<sup>32</sup> HM Government (2022). British Energy Security Strategy. (Online). Available at: [British energy security strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/british-energy-security-strategy.pdf) (Accessed June 2026)

<sup>33</sup> HM Government (2023). Shapps sets out plans to drive multi billion pound investment in energy revolution. (Online) Available at: [Shapps sets out plans to drive multi billion pound investment in energy revolution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/shapps-sets-out-plans-to-drive-multi-billion-pound-investment-in-energy-revolution). (Accessed June 2026).

onshore wind should be recognised in planning as an efficient, cheap and widely supported technology<sup>34</sup>.

### Carbon Budget Delivery Plan (March 2023)<sup>35</sup>

- 3.4.11 The Carbon Budget Delivery Plan 2023 has been designed and adopted to aid in the achievement of the goals contained within the UK's Sixth Carbon Budget. The Delivery Plan estimates that currently the UK would not be able to meet the requirements of the Sixth Carbon Budget, barely missing its target by 3% (reaching 97% of the required carbon savings by 2037) (page 15). However, the Delivery Plan highlights the need for continued research into low-carbon technologies and their use to enable the Sixth Carbon Budget to be met and exceeded and the Delivery Plan is confident such technologies would ensure the achievement of the Sixth Carbon Budget's requirements in reality. (page 15-16)
- 3.4.12 Onshore wind is identified as one of the key technologies that are helping the UK meet the requirements of the Carbon Budgets. Part of the Delivery Plan's advice is for the UK to establish local partnerships that can develop onshore wind farm development.
- 3.4.13 The Delivery Plan identifies onshore wind as an efficient, cheap, and widely supported technology (page 49). The Delivery Plan also identifies that establishing energy connections to renewable energy development (including onshore wind) should be made easier, to help provide assurance and savings to energy development developers.

### Powering Up Britain – The Net Zero Growth Plan<sup>36</sup>

- 3.4.14 Released in March 2023, the Net Zero Growth Plan seeks to reduce emissions across the economy of the UK and support the transition of its economy to being net zero, whilst maintaining economic growth. The Net Zero Growth Plan states the following with regard to the future of the UK's energy sector: "*A secure, reliable, cost-effective, decarbonised power sector is critical for a modern industrial economy*" (page 26). Demand for renewable energy is only going to increase in the future as the Net Zero Growth Strategy identifies that the demand for energy is likely to increase by up to 60% by 2035, making it harder to achieve decarbonisation goals (page 27). The Net Zero Growth Plan reiterates the statement that onshore wind is an efficient, cheap and widely supported technology (page 27).

### Clean Power 2030 Action Plan<sup>37</sup>

- 3.4.15 The Clean Power 2030 Action Plan sets out the UK Government's pathway to delivering a clean electricity system by 2030, including accelerating the deployment of renewable energy and reforming grid connections to enable timely delivery of infrastructure.
- 3.4.16 The Clean Power 2030 Action Plan identifies wind energy - particularly offshore wind - as central to the UK's future electricity system, with wind and solar forming the backbone of a clean, decarbonised grid. This position is set out in "Our pathway to 2030" and system overview sections (page 25), which describe the scale of renewable deployment required to achieve predominantly low-carbon electricity.

<sup>34</sup> HM Government (2023). Powering Up Britain. (Online) Available at: [Powering Up Britain - Joint Overview \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/powering-up-britain-joint-overview). (Accessed June 2026).

<sup>35</sup> HM Government (2023). Carbon Budget Delivery Plan. (Online) Available at: [Carbon Budget Delivery Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/carbon-budget-delivery-plan). (Accessed June 2026).

<sup>36</sup> HM Government (2023). Powering Up Britain – The Net Zero Growth Plan. (Online) Available at: [Powering Up Britain - The Net Zero Growth Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/powering-up-britain-the-net-zero-growth-plan). (Accessed June 2026).

<sup>37</sup> Welsh Government (2024). Clean Power 2030 Action Plan. (Online) Available at: [Clean Power 2030 Action Plan - GOV.UK](https://gov.uk/clean-power-2030-action-plan) (Accessed June 2026)

- 3.4.17 The Plan stresses the need to balance wind farm deployment with environmental and community considerations. The sections on “Integrating clean power and the natural environment” (page 41) and “What Clean Power means for local places” (page 47) highlight the importance of addressing biodiversity, landscape, and local impacts alongside delivering national energy objectives. To support this expansion, the Plan also emphasises reforming planning and consenting regimes to accelerate wind farm delivery. The “Planning and consenting” section (page 50) highlights the need to streamline approvals and remove barriers to infrastructure deployment, reinforcing strong national policy support for wind development.

### 3.5 Welsh National Strategies and Plans

#### A Low Carbon Revolution: Wales’ Energy Policy Statement (2010)<sup>38</sup>

- 3.5.1 The Energy Policy Statement (EPS) set the objective for Wales to become a world leader in low carbon energy following consultation on the Energy Route Map. The EPS summarises the pressing arguments to tackle climate change highlighting that: *“unless we quickly reduce our emissions of greenhouse gases, the world will probably be another 3°C hotter by 2060 and there will be much higher risks of catastrophic global climate changes”*. The headline target contained within the EPS is *“to renewably generate up to twice as much electricity annually by 2025 as we use today”* (page 26). With regard to onshore wind the target identified is *“to have 4.5 kWh/d/p of installed onshore wind generation capacity by 2015/2017”* (page 14). It recognises that the average electrical power consumption per person per day in Wales is approximately 22 kWh/d/p, so this target represents 20% of electricity consumption coming from onshore wind within the seven years following publication (to 2017).
- 3.5.2 While the targets set out in the Energy Policy Statement have now been superseded by more recent policy frameworks, the document remains an important early statement of Welsh Government support for renewable energy development.

#### The Climate Change Strategy for Wales (2010)<sup>39</sup>

- 3.5.3 This document sets out the Welsh Government’s commitments to and strategy for managing climate change in Wales through reducing GHG emissions and enabling effective adaptation in Wales. The Strategy sets targets to reduce GHG emissions in Wales by 3% every year and achieve at least a 40% reduction by 2020 compared to figures from the 1990 baseline. The commitments have subsequently been superseded by the legal requirements of the Environment (Wales) Act 2016, which introduced legally binding emissions reduction targets and carbon budgets for Wales.

#### Energy Wales: A Low Carbon Transition (2012)<sup>40</sup>

- 3.5.4 Energy Wales sets out the how the Welsh Government will work in partnership with private, public and social sectors to ensure the transition to a low carbon economy to secure a

<sup>38</sup> Welsh Assembly Government (2010). A Low Carbon Revolution – The Welsh Assembly Government Energy Policy Statement. (Online) Available at: <http://www.marineenergywales.co.uk/wp-content/uploads/2016/01/WAG-low-carbon-revolution2.pdf> (Accessed June 2026).

<sup>39</sup> Welsh Assembly Government (2010). Climate Change Strategy for Wales. Delivery Plan for Emission Reduction. (Online) Available at: <https://gov.wales/sites/default/files/publications/2019-04/climate-change-research-emission-reduction-scenarios.pdf> (Accessed June 2026).

<sup>40</sup> Welsh Government (2012). Energy Wales: A Low Carbon Transition. (Online) Available at: <https://gov.wales/sites/default/files/publications/2019-07/energy-wales-a-low-carbon-transition.pdf> (Accessed June 2026).

wealthier, more resilient and sustainable future for Wales. Amongst other measures, the document states that the Welsh Government seeks to make the best use of commercially proven renewable energy sources, facilitate appropriate deployment to deliver against Wales's low carbon objectives and realise the significant wealth generating opportunities Wales has.

- 3.5.5 The Welsh Government wants to provide leadership on the energy agenda in Wales. It aims to improve a number of areas to ensure the energy agenda progresses to a more low carbon format. In specific relation to delivering renewable energy the statement explains that in 2010 capacity from wind farms was 562MW, with 62% of renewable energy coming from wind or solar. The aim is to make best use of proven renewable sources, including onshore wind, and deliver against low carbon objectives. This will include improvements to the planning and consenting regime and ensure that the necessary infrastructure for a diverse portfolio of renewable energy is delivered.

### Energy Wales: A Low Carbon Transition Delivery Plan (2014)<sup>41</sup>

- 3.5.6 The Energy Wales Delivery Plan sets out how the Welsh Government proposed to implement the objectives set out in the Energy Wales (2012) document. The Delivery Plan includes a number of themes and priority project areas which are within the gift of the devolved administration to support, aimed at supporting the transition to a low carbon energy system and facilitating the deployment of renewable energy technologies.

### Energy Generation Targets for Wales: Statement to Assembly Members (2017) and 2023 Update<sup>42</sup>

- 3.5.7 In September 2017, the Welsh Government Cabinet Secretary for Environment and Rural Affairs announced to the Welsh Assembly that the Welsh Government was setting a target for Wales to generate 70% of its electricity consumption from renewable energy by 2030 and a target for 1GW of renewable electricity capacity in Wales to be locally owned by 2030. Additionally, it set a target for all renewable energy projects to have an element of local ownership.
- 3.5.8 In January 2023 the Welsh Government (Welsh Government, 2023a)<sup>43</sup> consulted on an updated target to meet 100% of its electricity needs from renewable sources by 2035 and to achieve 1.5GW of renewable energy capacity within local ownership by 2035. These targets were adopted in July 2023 (Welsh Government, 2023b)<sup>44</sup>.

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<sup>41</sup> Welsh Government (2014). Energy Wales: A Low Carbon Transition Delivery Plan. (Online) Available at: <https://gov.wales/sites/default/files/publications/2019-07/energy-wales-a-low-carbon-delivery-plan.pdf> (Accessed June 2026). <sup>42</sup> Welsh Government (2017) Lesley Griffiths high on ambition for clean energy. (Online) Available at: <https://gov.wales/lesley-griffiths-high-ambition-clean-energy> (Accessed June 2026).

<sup>42</sup> Welsh Government (2017) Lesley Griffiths high on ambition for clean energy. (Online) Available at: <https://gov.wales/lesley-griffiths-high-ambition-clean-energy> (Accessed June 2026).

<sup>43</sup> Welsh Government (2023a) Climate Change Minister - Wales aims to meet 100% of its electricity needs from renewable sources by 2035 (Online) Available at: <https://www.gov.wales/wales-aims-meet-100-its-electricity-needs-renewable-sources-2035> (Accessed June 2026).

<sup>44</sup> Welsh Government (2023b) Written Statement: Publication of Summary of Responses to the Consultation on Wales' Renewable Energy Targets (Online) Available at: <https://www.gov.wales/written-statement-publication-summary-responses-consultation-wales-renewable-energy-targets> (Accessed June 2026).

## Policy Statement: Local Ownership of Energy Generation in Wales – Benefitting Wales Today and for Future Generations (2020)<sup>45</sup>

- 3.5.9 This policy statement places considerable importance on moving from polluting energy generating technologies to renewables. It also identifies that Wales has made considerable and impressive gains in ensuring energy generating facilities have some form of public ownership, contributing to local economies considerably more than traditional ownership methods.
- 3.5.10 The Policy Statement clarifies the definition of local ownership as “*energy installations, located in Wales, which are owned by one or more individuals or organisations wholly owned and based in Wales, or organisations whose principal headquarters are located in Wales. This includes the following categories: Businesses; Farms and estates; Households and other domestic scale generation; Local Authorities; Other public sector organisations; Registered Social Landlords; Third sector organisations including social enterprises and charities, their subsidiaries, trading arms and special purpose vehicles.*”

## Programme for Government (2021)<sup>46</sup>

- 3.5.11 The Welsh Government’s Programme for Government published in June 2021 sets out the actions that the Welsh Government intend to take over the lifetime of the Senedd. It seeks to ensure that tackling the climate and nature emergencies is at the heart of Welsh Government activity. One of the ten well-being objectives is “*Embed our response to the climate and nature emergency in everything we do.*”

## Net Zero Wales (2021)<sup>47</sup>

- 3.5.12 The Environment (Wales) Act 2016 (as amended) Act requires the publication of a report setting out policies and proposals for each carbon budget period. In October 2021, the Welsh Government published Net Zero Wales: Carbon Budget 2 (2021 to 2025) which builds upon their previous plan Prosperity for All: A Low Carbon Wales (Welsh Government, 2019). This sets out a large number of policies for action in the five-year carbon budget period and proposals for action in the longer term to ensure that Wales meets the required average reduction of 37% in GHG emissions against the baseline and is on track to achieve net zero emissions in 2050.
- 3.5.13 The Plan reinforces the importance of delivering energy generation from renewable sources to meet the energy needs of Wales. The plan plays an important role in meeting challenges posed by the climate emergency declared by the Welsh Government in April 2019.<sup>48</sup>

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<sup>45</sup> Welsh Government (2020). Policy Statement: Local Ownership of Energy Generation in Wales – Benefitting Wales Today and for Future Generations. (Online) Available at: <https://gov.wales/sites/default/files/publications/2020-02/policy-statement-local-ownership-of-energy-generation-in-wales.pdf> (Accessed June 2026).

<sup>46</sup> Welsh Government (2021). Programme for Government: Well-being Statement. (Online) Available at: <https://gov.wales/sites/default/files/publications/2021-06/programme-for-government-2021-to-2026-well-being-statement.pdf> (Accessed June 2026).

<sup>47</sup> Welsh Government (2021). Net Zero Wales Carbon Budget 2 (2021-25). (Online) Available at: <https://gov.wales/sites/default/files/publications/2021-10/net-zero-wales-carbon-budget-2-2021-25.pdf> (Accessed June 2026).

<sup>48</sup> Welsh Government (2019) Minister for Environment, Energy and Rural Affairs Lesley Griffiths Welsh Government makes climate emergency declaration. (Online) Available at: [Welsh Government makes climate emergency declaration | GOV.WALES](https://gov.wales/gov.wales) (Accessed June 2026).

## Energy Generation Energy Generation & Use in Wales First Combined Edition (2026)<sup>49</sup>

- 3.5.14 The Energy Generation & Use in Wales First Combined Edition sets out the latest data on renewable energy generation and use. It sets out that 7.9TWh of energy generated in Wales was from renewables in 2024. Renewable electricity generation supplied 36% of total generation (compared to 34% in 2023). Wales had 1,285 MW of onshore wind capacity, which is greater than that in 2023 (1,267MW). Onshore wind provided equivalent to 70% of renewable output generation capacity in Wales. In 2024, 54% of all electricity consumed in Wales originated from renewable sources, showing a marginal increase from the previous year (53%) but still substantially below the 2035, 100% target.

## Renewable Energy Sector for Deal for Wales (2026)<sup>50</sup>

- 3.5.15 The Foreword to this document recognises that meeting the 2035 target to generate the equivalent of 100% of annual electricity consumption from renewable sources requires renewed urgency. The document's purpose is to therefore provide a framework to accelerate renewable energy deployment whilst ensuring that economic, social, environmental and community benefits are retained in Wales. The Sector Deal is focused around seven themes and 78 commitments. The commitments aim, in part, to speed up renewable energy deployment, for example working with the aviation sector to resolve potential conflicts between wind turbines and radar.

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<sup>49</sup> Welsh Government (2026) Energy Generation & Use in Wales First Combined Edition. (Online) Available at: [Energy Generation & Use in Wales: first combined edition](#) (Accessed June 2026).

<sup>50</sup> Welsh Government (2026) Renewable Energy Sector deal for Wales. (Online) Available at <https://www.gov.wales/sites/default/files/publications/2026-03/renewable-energy-sector-deal-for-wales.pdf> (Accessed August 2026)

## 4. Planning Policy Review

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### 4.1 Background

- 4.1.1 This section of the statement sets out the key planning policies relevant to the consideration of the Proposed Development at the UK, Wales and at a local level. It begins with an assessment of performance against UK and Welsh planning policy. It is followed by consideration of the scheme against the key policies contained within the BCBC, RCTCBC and NPTBC LDP and the guidance in non-statutory Supplementary Planning Guidance (SPG).

### 4.2 UK Planning Policy

- 4.2.1 This section sets out the relevant UK wide policy context set out in National Policy Statements (NPS). Developments of National Significance applications are determined in accordance with *Future Wales: The National Plan 2040* (considered in detail in the next section of this Planning Statement) in line with the revised legal framework since the NPS were first enacted in 2011. However, the NPS provide broader energy policy context that applies across England and Wales and are therefore briefly reviewed here.

### 4.3 Overarching National Policy Statement for Energy (EN-1) (2025)<sup>51</sup>

- 4.3.1 A revised version of NPS EN-1 came into force on 06 January 2026, replacing the previous version published in 2024. Section 2 EN-1 sets out the Government's commitment to achieving net zero greenhouse gas emissions by 2050 and reflects more recent policy objectives, including the delivery of a decarbonised power system under the Clean Power 2030 programme.
- 4.3.2 Recent revisions to the NPS (EN-1), alongside the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025, support the accelerated deployment of low carbon energy infrastructure. These changes include the reintroduction of onshore wind projects exceeding 100MW into the NSIP regime in England. The NPS also recognises the devolved planning context, noting that decisions relating to onshore electricity generating stations in Wales are devolved and determined under the Welsh planning system, rather than the NSIP regime. As such, the provisions of EN-1 relating to NSIPs are not of direct relevance to the determination of onshore wind developments in Wales, although is noted within the NPS that it may be a relevant consideration in planning decisions.
- 4.3.3 EN-1 identifies the delivery of low carbon energy infrastructure as a Critical National Priority, reflecting the urgent need for such development to meet net zero targets and ensure energy security. Within the NSIP regime, this establishes a strong policy presumption in favour of consent, with the benefits of low carbon energy development likely to outweigh residual adverse impacts in all but the most exceptional circumstances. While this policy framework applies primarily to nationally significant infrastructure, it is

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<sup>51</sup> Department for Energy Security and Net Zero (DESNZ) (2026). Overarching National Policy Statement for Energy (EN-1). (Online) Available at: [Overarching National Policy Statement for energy \(EN-1\), 2025 \(accessible webpage\) - GOV.UK](#) (Accessed June 2026).

nevertheless considered to be relevant in demonstrating the national importance and urgency of renewable energy development.

- 4.3.4 The Proposed Development would support the overarching aims of EN-1 by delivering renewable energy which would contribute to the achievement of net zero greenhouse gas emissions by 2050.

## 4.4 Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3) (2025)<sup>52</sup>

- 4.4.1 A revised version of NPS for Renewable Energy Infrastructure (EN-3) came into force on 06 January 2026. The scope of revised EN-3 reflects recent changes to the planning framework, most notably including the reintroduction of onshore wind >100MW into the NSIP regime in England.
- 4.4.2 NPS EN-3 remains a relevant consideration, as it reflects the UK Government's strengthened support for renewable energy deployment, the urgent need for significantly increased low-carbon electricity generation, and alignment with Clean Power 2030 objectives. As such, it demonstrates the wider national, UK need and policy support for onshore wind.

## 4.5 Welsh Planning Policy

### Future Wales: The National Plan 2040 (2021)<sup>53</sup>

- 4.5.1 Future Wales: The National Plan 2040 (Future Wales) was published by the Welsh Government in February 2021. Future Wales sets out the national development framework for Wales and has development plan status. As the highest tier of the development plan, it provides the framework for the development of regional level Strategic Development Plans (SDPs) (which have yet to be produced) and LDPs. Future Wales is the Welsh Government's "*strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong eco systems and improving the health and well-being of our communities*" (page. 6). Future Wales is the policy document against which DNS (including the Proposed Development) must be determined in accordance with unless material considerations indicate otherwise, in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 4.5.2 Future Wales has been prepared to provide a clear, long term spatial direction for Government policy, action and investment in Wales. It sets out a framework for addressing key national priorities through the planning system, inclusive of decarbonisation. It states (page. 46): "*Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.*"
- 4.5.3 Future Wales recognises the role that Wales can play in supporting the use of renewable energy. It recognises that "*Wales can become a world leader in renewable energy*

<sup>52</sup> Department for Energy Security and Net Zero (DESNZ) (2026). National Policy Statement for Renewable Energy Infrastructure. (Online) Available at: [National Policy Statement for renewable energy infrastructure \(EN-3\), 2025 \(accessible webpage\) - GOV.UK](#) (Accessed June 2026).

<sup>53</sup> Welsh Government (2021). Future Wales: The National Plan 2040. (online) Available at: <https://gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf> (Accessed June 2026).

*technologies” (page. 48). Furthermore, it recognises that, “Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions” (page. 48).*

- 4.5.4 Future Wales sets out 11 outcomes to provide a vision for change to 2040. Outcome 11 seeks *“A Wales where people live ... in places which are decarbonised and climate-resilient”* (page. 56). Further it states, *“The challenges of the climate emergency demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society”* (page. 56).
- 4.5.5 Future Wales reaffirms the Welsh Government’s commitment to maximising renewable and the Welsh Government targets (which have subsequently been updated as outlined):
- For 70% of electricity consumption to be generated from renewable energy by 2030 (which has now been superseded by Welsh Government (2023b) to 100% by 2035);
  - For one gigawatt of renewable energy capacity to be locally owned by 2030 (which has been superseded by Welsh Government (2023b) to 1.5 gigawatt by 2035); and
  - For new renewable energy projects to have at least an element of local ownership from 2020.
- 4.5.6 Future Wales confirms that energy generation accounted for 29% of GHG emissions in 2018 and is clear that large scale renewable electricity generation is vital meeting renewable energy and climate change targets and alternatives would not meet the targets (page. 97): *“The Welsh Ministers have considered alternatives to the need for new large-scale electricity generation infrastructure, including building-mounted installations and energy efficiency measures. Although we believe that these measures have an important part to play in meeting our energy, decarbonisation and climate change targets, they will not enable us to meet these objectives on their own.”*
- 4.5.7 Future Wales identifies 10 Pre-assessed Areas (PAAs) for wind within which there is a presumption in favour of large-scale wind development under Future Wales’ Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure subject to detailed criteria in Policy 18 – Renewable and Low Carbon Energy Developments of National Significance. Policy 17 states that *“The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs”* whilst decision makers are required to give *“significant weight”* to the need to meet international commitments and Wales’ target to generate 70% of energy from renewables by 2030. Policy 18 provides a detailed decision-making framework for the renewable and low carbon energy developments.
- 4.5.8 Additionally, Policy 9 – Resilient Ecological Networks and Green Infrastructure states that the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals. Policy 33 – National Growth Area – Cardiff, Newport and the Valleys sets out the overall strategic view for development in the South East which includes the area covered by BCBC. Amongst its provisions, the Policy states that *“The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities.”*

## Planning Policy Wales (Edition 12) (2024)<sup>54</sup>

- 4.5.9 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. PPW Edition 12 was adopted in February 2024. PPW, with the supporting Technical Advice Notes (TAN), Circulars and Policy Clarification letters comprise national planning policy but do not form part of the development plan.
- 4.5.10 At paragraph 3.30 PPW states that *“In 2019 the Welsh Government declared a climate emergency in order to coordinate action nationally and locally to help combat the threats of climate change. The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.”*
- 4.5.11 Chapter 5: Productive and Enterprising Places sets out the planning policy approach to energy within Wales. Para 5.7.6 states that *“The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government’s aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development.”*
- 4.5.12 PPW12 reaffirms the Welsh Government’s targets for renewable energy generation and local ownership. Para 5.7.7 states that *“The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance.”* PPW12 states that the planning system should (Para 5.7.7):
- *“Integrate development with the provision of additional electricity grid network infrastructure;*
  - *Optimise energy storage;*
  - *Facilitate the integration of sustainable building design principles in new development;*
  - *Optimise the location of new developments to allow for efficient use of resources;*
  - *Maximise renewable and low carbon energy generation;*
  - *Maximise the use of local energy sources, such as heat networks;*
  - *Minimise the carbon impact of other energy generation; and*
  - *Move away from the extraction of energy minerals, the burning of which is carbon intensive.”*
- 4.5.13 PPW states that local planning authorities should ensure *“development plan policies are supportive of renewable and low carbon energy development in all parts of Wales, direct developments to the right locations and set out clearly the local criteria against which proposals will be evaluated”* (Paragraph 5.9.10). PPW12 is also clear that local planning authorities should not seek to amend the PAAs identified in Future Wales within their LDPs.
- 4.5.14 PPW12 affirms that planning applications for onshore wind generating projects over 10MW are made directly to Welsh Ministers as part of the DNS process and are to be considered under the policies of Future Wales.

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<sup>54</sup> Welsh Government (2024). Planning Policy Wales Edition 12. (Online) Available at: [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12) (Accessed June 2026).

- 4.5.15 A number of changes were included as part of the revised PPW12, which mainly relate to Chapter 6 of PPW. The changes bring into practice updated policies and approaches including the use of the 'DECCA Framework' and the 'Step-wise approach' for delivery of a net benefit for biodiversity. Amongst the changes is also the identification of the need for all planning applications to be supported by a Green Infrastructure Statement proportionate to the development proposed.

## Technical Advice Notes

### Technical Advice Note 5: Nature Conservation and Planning (2009)<sup>55</sup>

- 4.5.16 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation within Wales. It sets out the key principles of planning for nature conservation for both local development plans and when deciding planning applications that may affect nature conservation. These include:
- Being mindful of the principles of sustainable development, environmental limits, the precautionary principle;
  - Contributing to the protection and improvement of the environment;
  - Promoting the conservation and enhancement of statutorily designated areas and undeveloped coast;
  - Ensuring that appropriate weight is attached to designated sites of international, national and local importance;
  - Protecting wildlife and natural features in the wider environment;
  - Ensuring that all material considerations are taken into account and decisions are informed by adequate information about the potential effects of development on nature conservation;
  - Ensuring that the range and population of protected species is sustained; and
  - Avoiding harm to nature conservation, minimising unavoidable harm by mitigation measures, offsetting residual harm by compensation measures and looking for new opportunities to enhance nature conservation.

### Technical Advice Note 6: Planning for Sustainable Rural Communities (2010)<sup>56</sup>

- 4.5.17 TAN 6 provides guidance on sustainable rural economies, rural services and housing and agriculture. It notes that planning authorities should support the diversification of the rural economy and that the planning system has a key role to play in supporting the delivery of sustainable rural communities. It goes on to consider the range of rural matters that the planning system should address from homes and employment opportunities to rural services whilst protecting and enhancing the natural and historic environment and safeguarding the countryside and open spaces. It also notes the need to respond to the challenges posed by climate change and identifies that one method which can contribute to this is renewable energy generation, particularly using local renewable sources. In paragraph 3.7.2, TAN6 considers farm diversification and notes the range of activities which

<sup>55</sup> Welsh Assembly Government (2009). Technical Advice Note 5: Nature Conservation and Planning. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf> (Accessed June 2026).

<sup>56</sup> Welsh Assembly Government (2010). Technical Advice Note 6: Planning for Sustainable Rural Communities. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan6-sustainable-rural-communities.pdf> (Accessed June 2026).

can be sustainably located on farms and notes that the production of renewable energy is likely to be an appropriate use.

### Technical Advice Note 11: Noise (1997)<sup>57</sup>

- 4.5.18 TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise, without placing unreasonable burdens on applicants. Local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.

### Technical Advice Note 12: Design (2016)<sup>58</sup>

- 4.5.19 The purpose of this TAN is to equip all those involved in the design of development with advice on how 'promoting sustainability through good design' may be facilitated through the planning system and the preparation and validation of mandatory design and access statements. There are a number of key objectives in relation to design which are set out by TAN 12:

- Access - Ensuring ease of access for all;
- Character - Sustaining or enhancing local character, promoting legible development, promoting a successful relationship between public and private space, promoting quality, choice and variety and promoting inclusive design;
- Community Safety - Ensuring attractive, safe public spaces and security through natural surveillance;
- Environmental Sustainability - Achieving efficient use and protection of natural resources, enhancing biodiversity and designing for change; and
- Movement - Promoting sustainable means of travel.

### Technical Advice Note 23: Economic Development (2014)<sup>59</sup>

- 4.5.20 TAN 23 sets out guidance for the approach to economic development. Under section 3, TAN 23 reaffirms the importance of sustainable economic development in rural areas. Under paragraph 2.1.13 the TAN restates that the planning system should support (inter alia) the low-carbon economy. TAN 23 states that the balance between economic benefits and social and environment impacts need to be carefully weighed up and decisions on each case will depend on local circumstances.

### Technical Advice Note 24: The Historic Environment (2026)<sup>60</sup>

- 4.5.21 TAN 24 sets out the guidance on how the planning system in Wales should consider and manage the historic environment as part of proposals. TAN 24 emphasises the importance

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<sup>57</sup> Welsh Assembly Government (1997). Technical Advice Note 11: Noise. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan11-noise.pdf> (Accessed June 2026).

<sup>58</sup> Welsh Government (2016). Technical Advice Note 12: Design. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan12-design.pdf> (Accessed June 2026).

<sup>59</sup> Welsh Government (2014). Technical Advice Note 23: Economic Development. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan23-economic-development.pdf> (Accessed June 2026).

<sup>60</sup> Welsh Government (2026). Technical Advice Note 24: The Historic Environment. (Online) Available at: [Technical advice note \(TAN\) 24: the historic environment](#) (Accessed June 2026).

of integrating heritage considerations into sustainable development ensuring that development appropriately assesses the impacts on the significance and setting of historic assets based on the six principles of conservation under paragraph 1.10.

4.6 The Local Development Plan

- 4.6.1 As described in Section 4.5 above, Future Wales forms the highest tier of the Development Plan and contains the primary planning policies against which DNS are determined. This section of the Planning Statement sets out the key LDP policies relevant to the consideration of the Proposed Development. The Proposed Development is predominantly within the administrative boundary of Bridgend County Borough Council (BCBC). As such, BCBC is considered to be the lead Local Planning Authority (LPA).
- 4.6.2 However, access to the Northern and Southern Array will be achieved via existing access tracks which serve operational wind farms in the area. Starting north at the A4061, the access tracks travel south through the Pen y Cymoedd Wind Farm, then cross the A4107 and traverse the Llynfi Afan Wind Farm. The access track traverses the RCTCBC and NPTC authority areas.

Replacement Bridgend Local Development Plan 2018 to 2033<sup>61</sup>

- 4.6.3 BCBC adopted its RLDP in March 2024 which sets policies to guide development up to 2033. The RLDP constitutes the development plan for BCBC and is the basis for decisions on land use planning in the area. It sets out key policies and land use allocations to guide development up to 2033. The policies of relevance to the Proposed Development are identified below in **Table 4.1**.

Table 4.1 Replacement Bridgend Local Development Plan 2018 to 2033

| Adopted LDP policy                                       | Policy summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SP1: Regeneration and Sustainable Growth Strategy</b> | Policy SP1 requires the proposal to demonstrate alignment with the Plan’s strategic spatial approach, sustainability objectives and infrastructure led growth principles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>SP3: Good Design and Sustainable Placemaking</b>      | Policy SP3 requires all development to deliver high-quality design and adopt a sustainable placemaking approach, creating attractive, healthy and well-connected places that respond positively to their natural, historic and built context. Proposals must demonstrate good design principles through appropriate scale, layout, materials and density, while promoting active travel, efficient land use, community safety and environmental protection. The policy also emphasises biodiversity enhancement, sustainable resource use, climate resilience, and the provision of necessary infrastructure, ensuring that development supports both existing communities and future needs without adversely affecting amenity or environmental quality. |
| <b>SP4: Mitigating the Impact of Climate Change</b>      | Policy SP4 requires all development proposals to contribute positively to climate change mitigation and adaption. This includes promoting sustainable transport, minimising energy demand, supporting renewable and low carbon energy generation, using resources more efficiently,                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

<sup>61</sup> Bridgend County Borough Council (2024). Local Development Plan. (Online) Available at: [Replacement Bridgend Local Development Plan 2018 to 2033](#) (Accessed June 2026).

enhancing biodiversity resilience and avoiding flood risk. Proposals must clearly demonstrate how these measures are incorporated into their design and delivery.

**SP5: Sustainable Transport and Accessibility**

Policy SP5 requires development to be located and designed to minimise the need to travel and reduce reliance on private cars, while facilitating sustainable access to jobs, services and facilities. It promotes the sustainable transport hierarchy, prioritising walking, cycling and public transport, and requires safe and efficient access to transport networks. The policy also seeks to protect and enhance active travel routes, support delivery of local transport improvements, mitigate impacts on the highway network, reduce transport-related emissions, and ensure appropriate parking and infrastructure (including for emerging technologies). Development that would harm the safe and effective operation of the transport network will not be permitted.

**PLA9: Development Affecting Public Rights of Way**

Policy PLA9 requires development to link with and seek to minimise impacts on the PRoW network. The policy states that any adverse impacts on the character, safety, enjoyment and convenient use of a PRoW must be mitigated.

**SP10: Infrastructure**

Policy SP10 requires proposals to demonstrate that they are supported by adequate infrastructure capacity or will contribute to the timely provision of necessary infrastructure required to make the development acceptable. This includes ensuring that impacts on transport, utilities, education, community facilities, drainage and other essential services are appropriately assessed and mitigated.

**SP13: Renewable and Low Carbon Energy Development**

Policy SP13 supports renewable and low carbon energy development where proposals avoid unacceptable environmental, landscape, transport and amenity impacts, provide for restoration and grid connection, and do not give rise to cumulative effects. It identifies specific Local Search Areas as suitable for wind and solar development and seeks to safeguard these areas from development that would prejudice their renewable energy potential, including alignment with Future Wales Pre-Assessed Areas for Wind Energy.

**ENT12: Development in Mineral Safeguarding Zones**

Policy ENT12 seeks to safeguard mineral resources by ensuring that development within mineral safeguarding areas does not unnecessarily sterilise minerals. Proposals must demonstrate that extraction is either not viable, would not be prejudiced by the development, or that any temporary development can be restored within the timeframe required for future mineral working.

**SP17: Conservation and Enhancement of the Natural Environment**

Policy SP17 seeks to protect and enhance the natural environment by resisting development that would harm landscape character, biodiversity, natural resources or the integrity of the countryside. It affords strong protection to internationally and nationally designated sites, requiring Habitats Regulations Assessment where relevant, and permits development only where it can be demonstrated that there would be no adverse effects on designated sites or environmental quality.

**DNP1: Development in the Countryside**

Policy DNP1 seeks to conserve and enhance the countryside by maintaining a presumption against development outside settlement boundaries, except for specified uses including renewable energy. Acceptable development must be sustainable, respect natural and cultural heritage, and prioritise the re-use of existing buildings and previously developed land where possible.

|                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DNP5: Local and Regional Nature Conservation Sites</b>            | Policy DNP5 seeks to protect local and regional nature conservation sites by resisting development that would harm their ecological or geological value, unless the benefits outweigh the harm or it can be appropriately mitigated or compensated. Development must be compatible with the site's conservation interest and support its ongoing management and educational role.                                                                                                                   |
| <b>DNP6: Biodiversity, Ecological Networks, Habitats and Species</b> | Policy DNP6 requires development to deliver a net benefit for biodiversity, maintain and enhance ecological networks, and support ecosystem resilience. Proposals must retain and enhance green infrastructure where possible, avoid harm to habitats and species, and minimise impacts through design. Where harm is unavoidable, it must be justified, mitigated, or compensated to ensure no loss and where possible a net gain in biodiversity, supported by appropriate ecological assessment. |
| <b>DNP7: Trees, Hedgerows and Development</b>                        | Policy DNP7 requires proposals to demonstrate that they will not adversely affect trees, woodlands or hedgerows of amenity, ecological or cultural value, or those providing important ecosystem services. If any trees are affected the proposals must be supported by a BS 5837 compliant assessment. Where tree loss is unavoidable, a replacement planting and aftercare scheme must be agreed prior to development.                                                                            |
| <b>DNP8: Green Infrastructure</b>                                    | Policy DNP8 requires development to integrate with, protect and enhance existing green infrastructure, improving its extent, quality, connectivity and multifunctionality. Where loss is unavoidable it is advised that appropriate mitigation and compensation measures must be provided. The policy also requires all major developments to be supported by a Green Infrastructure Assessment.                                                                                                    |
| <b>DNP9: Natural Resource Protection and Public Health</b>           | Policy DNP9 seeks to protect natural resources and public health by ensuring development does not cause or worsen unacceptable risks from pollution, contamination, land instability or other environmental hazards. Proposals must demonstrate that impacts can be avoided or mitigated, with particular regard to sensitive uses and flood risk, supported by appropriate assessments where required.                                                                                             |
| <b>SP18: Conservation of Historic Environment</b>                    | Policy SP18 requires the proposals to demonstrate that they protect, conserve and, where appropriate, enhance the significance of heritage assets and their settings, with a strong presumption in favour of their preservation.                                                                                                                                                                                                                                                                    |

## The Rhondda Cynon Taf Local Development Plan 2006 - 2021<sup>62</sup>

- 4.6.4 The Rhondda Cynon Taf Local Development Plan 2006 - 2021 (RCT LDP) is the statutory planning document that sets out the overall strategy for land use and development across the County Borough over a 15-year period. It identifies areas suitable for development as well as those requiring protection and establishes a comprehensive policy framework and site-specific allocations to guide different types of development. Adopted in March 2011, the LDP provides the basis for determining planning applications, ensuring that growth is managed in a planned, sustainable and coordinated manner in line with local objectives and national planning policy.

<sup>62</sup> Rhondda Cynon Taf (2011) Local Development Plan up to 2021. (Online) Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/LocalDevelopmentPlans/RelateddocumentsLDP20062021/AdoptedLocalDevelopmentPlan.pdf> (Accessed June 2026)

- 4.6.5 As stated above in section 4.6 the access track for the Proposed Development traverses partly through RCT and is located in the LDP's Northern Strategy Area. Relevant policies to the proposed access route are listed below in **Table 4.2**:

**Table 4.2 Rhondda Cynon Taf Local Development Plan 2006 - 2021 (RCT LDP)**

| Adopted LDP policy                                                | Policy summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CS1: Development in the North</b>                              | Policy CS1 supports sustainable growth in the Northern Strategy Area by directing development to key settlements, promoting regeneration and reuse of brownfield land, improving accessibility and sustainable transport, supporting economic diversification, and protecting the natural and cultural environment, in order to reduce out-commuting and strengthen local communities.                                                                                          |
| <b>CS10: Minerals</b>                                             | Policy CS10 seeks to safeguard mineral resources and ensure a sustainable supply by maintaining adequate reserves, protecting areas of known resources from sterilisation, and encouraging prior extraction where appropriate. Proposals must incorporate restoration and aftercare, promote efficient use of resources, and ensure impacts on the environment, communities and transport networks are kept within acceptable limits.                                           |
| <b>AW5: New Development</b>                                       | Policy AW5 supports development where it is well-designed, protects local character and amenity, and is compatible with surrounding uses. Proposals must be accessible by sustainable transport, minimise reliance on the private car, and provide safe access and appropriate parking without causing unacceptable traffic impacts.                                                                                                                                            |
| <b>AW6: Design and Placemaking</b>                                | Policy AW6 supports high-quality design and placemaking by requiring development to reflect local character, integrate landscaping, promote sustainable transport and connectivity, and make efficient use of land. Proposals must enhance the built and natural environment, support biodiversity, energy efficiency and water management, and demonstrate flexibility and functionality, with masterplans required for larger residential and commercial schemes.             |
| <b>AW7: Protection and Enhancement of the Built Environment</b>   | Policy AW7 seeks to protect and enhance the built and historic environment by requiring development affecting heritage or archaeological assets to preserve or enhance their character and appearance. It also resists the loss of open space and access routes unless there is clear surplus, appropriate replacement, or demonstrable enhancement of existing facilities.                                                                                                     |
| <b>AW8: Protection and Enhancement of the Natural Environment</b> | Policy AW8 seeks to protect and enhance the natural environment by resisting development that would harm locally designated sites or features of ecological and landscape importance. Proposals must avoid or minimise impacts on biodiversity, ecological networks and natural resources, and demonstrate appropriate mitigation, compensation and ecological assessment where required, with support given to development that contributes to ecological network enhancement. |
| <b>AW10: Environmental Protection and Public Health</b>           | Policy AW10 seeks to protect environmental quality and public health by resisting development that would cause unacceptable harm through pollution, contamination, land instability, flooding or other hazards. Proposals must demonstrate that any adverse impacts can be effectively avoided or mitigated to an acceptable level.                                                                                                                                             |

**AW14: Safeguarding of Minerals**

Policy AW14 seeks to safeguard mineral resources by resisting development that would unnecessarily sterilise or hinder their extraction. It protects identified areas of sand and gravel, sandstone, limestone and coal, and applies buffer zones around active quarries to ensure continued operation.

**NSA25: Special Landscape Areas**

Policy NSA25 identifies Special Landscape Areas and requires development within them to achieve high standards of design, siting and materials that are appropriate to, and conserve, the character and quality of the landscape.

## The Neath Port Talbot Local Development Plan (LDP) 2011 - 2026<sup>63</sup>

- 4.6.6 The Neath Port Talbot Local Development Plan (LDP) 2011–2026, adopted in January 2016, forms the statutory development plan for the County Borough and provides the framework for land use and development over the plan period. It establishes the strategic vision, objectives and spatial strategy for the area, alongside a comprehensive set of overarching, area-based and topic-specific policies and site allocations to guide development. The LDP is used as the primary basis for determining planning applications and managing sustainable growth within Neath Port Talbot.
- 4.6.7 As stated above in section 4.6 the access route for the Proposed Development traverses through NPTCBC. Relevant policies to the proposed access track are therefore listed below:

**Table 4.2 Neath Port Talbot Local Development Plan (LDP) 2011 - 2026**

| Adopted LDP policy                                        | Policy summary                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SC1: Settlement Limits</b>                             | Policy SC1 directs development to within defined settlement limits, where proposals proportionate to the settlement hierarchy are acceptable in principle. Outside settlement limits, development is strictly controlled and only permitted for specific uses, including infrastructure and energy generation, with any proposals required to be sustainably located, well-related to existing development, and appropriate in scale and form. |
| <b>EN2: Special Landscape Areas</b>                       | Policy EN2 designates Special Landscape Areas and seeks to protect their high landscape value by only permitting development where it can be demonstrated that there would be no significant adverse impact on their defining characteristics.                                                                                                                                                                                                 |
| <b>SP15: Biodiversity and Geodiversity</b>                | Policy SP15 seeks to protect, conserve and enhance biodiversity and geodiversity by safeguarding internationally, nationally, and locally designated sites, as well as important habitats, species and geological features. Development must avoid harm and support the long-term management of natural heritage assets.                                                                                                                       |
| <b>EN6: Important Biodiversity and Geodiversity Sites</b> | Policy EN6 seeks to protect important local and regional biodiversity and geodiversity sites by requiring development to conserve and enhance their natural heritage value. Proposals will only be permitted where impacts are acceptable or where there are no reasonable alternatives                                                                                                                                                        |

<sup>63</sup> Neath Port Talbot County Borough Council (2016). Local Development Plan (2011-2026). (Online) Available at: [https://media.npt.gov.uk/media/ca2fbumd/ldp\\_written\\_statement\\_jan16.pdf?v=20240823155047](https://media.npt.gov.uk/media/ca2fbumd/ldp_written_statement_jan16.pdf?v=20240823155047) (Accessed June 2026).

and the benefits outweigh the harm, with appropriate mitigation or compensation secured where necessary.

|                                                      |                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>EN7: Important Natural Features</b>               | Policy EN7 seeks to protect important natural features, such as trees, hedgerows and watercourses, by requiring development to retain and integrate these features within design wherever possible. Where loss is unavoidable, appropriate mitigation measures must be provided to address impacts on biodiversity and landscape value.                        |
| <b>EN8: Pollution and Land Stability</b>             | Policy EN8 requires development proposals to demonstrate that there would not be an unacceptable adverse effect on health, biodiversity and/or local amenity or expose people to unacceptable risk. Proposals must demonstrate that any adverse impacts can be effectively mitigated to an acceptable level.                                                   |
| <b>SP16: Environment Protection</b>                  | Policy SP16 seeks to protect and improve environmental quality by ensuring development does not cause significant adverse effects on air, water or land, prioritises brownfield land where appropriate, and avoids increasing exposure to pollution for existing or future occupants.                                                                          |
| <b>SP17: Minerals</b>                                | Policy SP17 seeks to ensure a sustainable supply of minerals by safeguarding resources, maintaining adequate reserves, and promoting efficient use of materials. Development must minimise impacts on the environment and communities, with buffer zones used to protect sensitive uses from mineral operations.                                               |
| <b>M1: Development in Mineral Safeguarding Areas</b> | Policy M1 seeks to safeguard mineral resources by controlling development within mineral safeguarding areas. Proposals will only be permitted where the resource is of no value, can be extracted prior to development, would not be prejudiced, or there is an overriding need, including ensuring temporary uses do not sterilise future mineral extraction. |
| <b>M3: Development in Mineral Buffer Zones</b>       | Policy M3 seeks to protect mineral operations by restricting development within mineral buffer zones unless it can be demonstrated that mineral resources will not be sterilised and that the proposed development would not be adversely affected by ongoing mineral activities.                                                                              |
| <b>TR2: Design and Access of New Development</b>     | Policy TR2 requires development to ensure safe and efficient access, avoid adverse impacts on the highway network, and be accessible by a range of sustainable transport modes. Proposals must provide appropriate parking and servicing and be supported by Transport Assessments and Travel Plans where significant traffic generation is expected.          |
| <b>SP21: Built Environment and Historic Heritage</b> | Policy SP21 seeks to conserve and enhance the built environment and historic heritage by promoting high-quality design, protecting key landscapes and gateways, and safeguarding designated heritage assets, including Conservation Areas, Listed Buildings, Scheduled Monuments and historic landscapes.                                                      |

## 4.7 Other Local Planning Considerations

### Supplementary Planning Guidance

#### Bridgend County Borough Council

- 4.7.1 The Council has also adopted the following Supplementary Planning Guidance (SPG) documents which are considered to be of relevance:

#### *SPG19 Biodiversity and Development*<sup>64</sup>

- 4.7.2 This guidance promotes a green infrastructure-led approach, requiring development to integrate, protect and enhance biodiversity and natural features as part of the design process rather than treating them as constraints. It emphasises early assessment of ecological assets, retention of existing habitats, and the creation of connected, multifunctional green networks that deliver environmental, social and economic benefits. Development should follow the mitigation hierarchy (avoid, mitigate, compensate, enhance), provide appropriate surveys and management plans, and secure long-term maintenance, with opportunities taken to deliver measurable biodiversity enhancements alongside necessary mitigation.

#### *SPG20 Renewables in the Landscape*<sup>65</sup>

- 4.7.3 SPG20 (Renewables in the Landscape) provides guidance on the siting and design of renewable energy developments to ensure they are appropriately integrated into the landscape. It emphasises the need to understand landscape character and sensitivity, requiring proposals to be informed by robust assessment (including LVIA where necessary) and to minimise adverse visual and cumulative impacts. The SPG promotes careful site selection, high-quality design, and mitigation to protect key landscape features, views and designations, while supporting the delivery of renewable energy in suitable locations where landscape capacity can accommodate development.

#### Rhondda Cynon Taf County Borough Council

#### *Access Circulation and Parking*<sup>66</sup>

- 4.7.4 This SPG provides detailed guidance on how development should address access, circulation and parking to support sustainable transport and effective placemaking. It requires proposals to demonstrate safe and efficient access to the highway network, supported by proportionate Transport Assessments and Travel Plans where necessary. The SPG promotes a shift away from car-dominated design, encouraging walking, cycling and public transport, and introduces maximum parking standards based on accessibility and location to help manage demand. It also emphasises high-quality street and layout design, appropriate servicing arrangements, and consideration of public rights of way,

<sup>64</sup> Bridgend County Borough Council (2014) SPG 19 Biodiversity & Development. (Online) Available at: <https://www.bridgend.gov.uk/media/a3fou4rh/spg-19-biodiversity-and-development.pdf> (Accessed June 2026).

<sup>65</sup> Bridgend County Borough Council (N.D) SPG 20 Renewables in the Landscape. (Online) Available at: <https://www.bridgend.gov.uk/media/km3oh30e/spg-20-renewables-in-the-landscape.pdf> (Accessed June 2026).

<sup>66</sup> Rhondda Cynon Taf (2011) Delivering Design and Placemaking: Access, Circulation & Parking Requirements. (Online) Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/LocalDevelopmentPlans/RelateddocumentsSupplementaryplanningGuidanc/AccessCirculationandParkingSPG.pdf> (Accessed June 2026).

alongside the potential for developer contributions and ongoing management measures to ensure that transport infrastructure operates safely and effectively.

### *Nature Conservation*<sup>67</sup>

- 4.7.5 This SPG provides guidance to ensure development protects and enhances biodiversity, geological features and wider ecosystem services as part of the planning process. It emphasises that biodiversity considerations are a material factor for most sites and should be addressed early through appropriate surveys and design. Development should avoid harm to designated sites, protected habitats and species, maintain and enhance ecological networks and connectivity, and follow a mitigation hierarchy where impacts cannot be avoided. Proposals are expected to demonstrate no net loss of biodiversity where possible, incorporate mitigation, compensation and enhancement measures, and secure long-term management through planning conditions or obligations.

### *The Historic Built Environment*<sup>68</sup>

- 4.7.6 This SPG seeks to ensure that development preserves or enhances the character, appearance, significance and setting of heritage assets, including listed buildings, conservation areas, archaeological remains, historic parks and gardens, and historic landscapes. The SPG requires heritage considerations to be integrated into the design process and that proposals demonstrate an appropriate understanding of, and response to, the historic environment.

## Neath Port Talbot County Borough Council

### *Biodiversity and Geodiversity*<sup>69</sup>

- 4.7.7 This Supplementary Planning Guidance requires development to protect, conserve and enhance biodiversity and geodiversity as an integral part of the planning process. Proposals must assess ecological and geological features at an early stage, avoid harm to designated sites, habitats and species where possible, and ensure no net loss of biodiversity, with opportunities for net gain encouraged. A step-wise approach is promoted with strong emphasis on maintaining ecological connectivity, protecting green infrastructure, and supporting ecosystem resilience. Development must be supported by appropriate surveys, assessment and long-term management measures, with mitigation and compensation secured where impacts are unavoidable and enhancement incorporated wherever possible.

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<sup>67</sup> Rhondda Cynon Taf (2011) Nature Conservation. (Online) Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/LocalDevelopmentPlans/RelateddocumentsSupplementaryplanningGuidanc/NatureConservationSPG.pdf> (Accessed June 2026).

<sup>68</sup> Rhondda Cynon Taf (2011) Supplementary Planning Guidance: The Historic Built Environment. (Online) Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/LocalDevelopmentPlans/RelateddocumentsSupplementaryplanningGuidanc/TheHistoricBuiltEnvironmentSPG.pdf> (Accessed June 2026).

<sup>69</sup> Neath Port Talbot County Borough Council (2018) Biodiversity and Geodiversity. (Online) Available at: [https://media.npt.gov.uk/media/nqpnpgge/spg\\_biodiversity\\_geodiversity\\_may18.pdf?v=20241209172432](https://media.npt.gov.uk/media/nqpnpgge/spg_biodiversity_geodiversity_may18.pdf?v=20241209172432) (Accessed June 2026).

## *The Historic Environment*<sup>70</sup>

- 4.7.8 This SPG requires development to conserve and enhance the historic environment, ensuring that both designated and non-designated heritage assets are protected with a strong presumption in favour of preservation. Proposals must assess impacts on heritage significance and setting, avoid or minimise harm, and justify any adverse effects where unavoidable, while seeking opportunities for sensitive reuse and enhancement of historic assets.

## *Pollution*<sup>71</sup>

- 4.7.9 The SPG requires development to avoid and minimise pollution impacts on health, biodiversity and amenity, ensuring sites are suitable for use and that any effects are mitigated to an acceptable level.

## **Emerging LDP's**

### **RCT Revised Local Development Plan (LDP) 2022 – 2037<sup>72</sup>**

- 4.7.10 RCTCBC is currently preparing a Revised Local Development Plan for the period 2022-2037. It is currently at the Pre-Deposit (Preferred Strategy) Stage<sup>73</sup>, which was subject to public consultation between February and April 2024. The Preferred Strategy includes the following draft strategic policies of relevance:
- Draft Strategic Policy SP1: Climate Change and Carbon – draft policy SP1 requires development to minimise carbon emissions and address climate change, with a focus on locating development in sustainable areas. The policy also supports appropriate renewable energy development, alongside measures to reduce waste and increase recycling.
  - Draft Strategic Policy SP2: Placemaking and Sustainable Communities - draft policy SP2 requires development to contribute to sustainable, well-designed places that support inclusive, healthy and resilient communities. Proposals should reflect placemaking principles, be accessible and responsive to local context, climate change and biodiversity, and be appropriate in scale and layout. Development is expected to safeguard amenity and well-being, provide or enhance green infrastructure, and ensure sufficient infrastructure capacity, while incorporating energy efficiency, renewable energy and sustainable management of resources.
  - Draft Strategic Policy SP4: Biodiversity and the Natural Environment – draft policy SP4 seeks to protect and enhance biodiversity across RCT, requiring development to avoid impacts on designated sites, particularly SINCs, where possible and to demonstrate appropriate mitigation and enhancement where impacts arise. Priority is given to on-site mitigation, with off-site measures only acceptable where they

<sup>70</sup> Neath Port Talbot County Borough Council (2019). The Historic Environment. (Online) Available at: [https://media.npt.gov.uk/media/zasgszo5/spg\\_historic\\_environment\\_april19.pdf?v=20241209172433](https://media.npt.gov.uk/media/zasgszo5/spg_historic_environment_april19.pdf?v=20241209172433) (Accessed June 2026).

<sup>71</sup> Neath Port Talbot County Borough Council (2016) Pollution. (Online) Available at: [https://media.npt.gov.uk/media/uhck2amj/spg\\_pollution\\_oct16.pdf?v=20241209172432](https://media.npt.gov.uk/media/uhck2amj/spg_pollution_oct16.pdf?v=20241209172432) (Accessed June 2026).

<sup>72</sup> Revised Local Development Plan (LDP) 2022 – 2037 | Rhondda Cynon Taf County Borough Council

<sup>73</sup> Rhondda Cynon Taf (2024) Preferred Strategy. (Online). Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/RelatedDocuments/Pdfs/RevisedLDP20222037PreferredStrategy.pdf> (Accessed June 2026).

deliver demonstrably better outcomes without compromising ecological connectivity or function. All development is expected to deliver effective biodiversity mitigation and enhancement, leaving the natural environment in a more resilient condition.

- 4.7.11 Following the consultation, an Initial Consultation Report was prepared and, the Council is progressing work on refining the strategy, policies and allocations in response to representations and ongoing evidence base work.
- 4.7.12 The Plan is therefore advancing towards the Deposit Plan stage, which will form the next formal stage of consultation prior to submission for independent examination. However, delays to the programme mean that the previous Delivery Agreement timetable (which anticipated adoption in May 2026)<sup>74</sup> has not been met and is now out of date.

### NPT Replacement Local Development Plan (RLDP) 2023–2038

- 4.7.13 The emerging Neath Port Talbot Replacement Local Development Plan (RLDP) 2023–2038 is currently at the Preferred Strategy stage, which establishes the high-level vision, growth strategy, strategic policies and key development sites for the County Borough.
- 4.7.14 Public consultation on the Preferred Strategy<sup>75</sup> was undertaken between December 2024 and February 2025, with feedback informing amendments to key site allocations and the supporting evidence base. The Preferred Strategy included the following draft strategic policies of relevance:
- Draft Strategic Policy SP3: Nature Emergency, Biodiversity and the Natural Environment – draft policy SP3 requires development to deliver biodiversity net benefit and enhance ecosystem resilience, safeguarding protected species and designated habitats, protecting the integrity of designated sites, and enhancing wider ecological networks and green infrastructure.
  - Draft Strategic Policy SP12: Renewable and Low Carbon Energy Generation – draft policy SP12 supports renewable and low carbon energy developments and associated infrastructure where they contribute to meeting national renewable energy and energy efficiency targets and promote the optimisation of local energy supply and distribution. Development proposals must ensure that any environmental, amenity and cumulative impacts are appropriately assessed and are not unacceptable.
  - Draft Strategic Policy SP13: Minerals – draft policy SP13 supports the sustainable supply and efficient use of minerals, safeguarding resources and managing potential conflicts with sensitive land uses, while ensuring that environmental and amenity impacts are acceptable.
  - Draft Strategic Policy SP15: Historic Environment – draft policy SP15 requires development to conserve and enhance the historic environment through high quality design, safeguard heritage assets and their settings, and protect designated and locally important features and areas.

<sup>74</sup> Rhondda Cynon Taf (2023). Delivery Agreement. (Online) Available at: <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/RelatedDocuments/Pdfs/RCTRevisedLDPDeliveryAgreement.pdf> (Accessed June 2026).

<sup>75</sup> Neath Port Talbot Council (2024) Preferred Strategy (Consultation Document). (Online) Available at: <https://media.npt.gov.uk/media/znbliwac/doc-2-eng-preferred-strategy-easy-read-version.pdf?v=20241212120026>. Accessed June 2026).

- Draft Strategic Policy SP18: Environmental Protection – draft policy SP18 requires development to safeguard environmental quality by assessing and mitigating impacts relating to environmental constraints, including air quality, land, water, noise and flood risk, ensuring no unacceptable effects on the environment or amenity.

4.7.15 The RLDP is progressing towards the Deposit Plan stage (anticipated late 2026), with submission for examination expected in 2027 and adoption currently anticipated for 2028<sup>76</sup>.

## 4.8 Other Relevant Strategies

### Cardiff Capital Region City Deal

#### Cardiff Capital Region City Deal (CCR) Energy Vision and Strategy (2021)<sup>77</sup>

4.8.1 Cardiff Capital Region City Deal (CCR) (which includes CCBC) has developed an Energy Vision and Strategy in partnership with the Welsh Government. The Strategy seeks to set out a route to decarbonisation that will enable the region to achieve a net zero energy system by 2050, which includes supporting low carbon technologies. The vision is guided by three core principles, which seek to:

1. Act as an enabler to a sustainable regional economy: deliver inclusive employment, profits and skills, lower costs and open up markets, and stimulate public and private investment in capital projects that deliver low carbon improvements across the region.
2. Contribute wider benefits to the region: including alleviating fuel poverty, sparking innovation and developing local training and skills.
3. Decarbonise the energy system to meet national targets as a minimum: carbon reductions across all sectors, energy efficiency as a core focus, and to have a multi-vector system that includes a range of low carbon technologies.

4.8.2 The Strategy also seeks to decarbonise the regions public transport through electrification.

#### Cardiff Capital Region Regional Economic & Industrial Plan 2023-2028<sup>78</sup>

4.8.3 The CCR Regional Economic & Industrial Plan 2023-2028 establishes the economic and industrial strategy and future for the region. The Plan seeks to ensure that the economy of the region is “*bigger, fairer and greener*”. (Page 3)

4.8.4 The Plan seeks to decarbonise the regions environment by 2050 and highlights that adopting a business as usual approach would ensure the region misses its

<sup>76</sup> Neath Port Talbot Council (2026) Neath Port Talbot Replacement Local Development Plan (RLDP) 2023-2038. (Online) Available at: <https://democracy.npt.gov.uk/documents/s111607/Council%2026-Feb-26%20RLDP%20Report.pdf> (Accessed June 2026).

<sup>77</sup> Welsh Government Energy Service (2021) Cardiff Capital Region Energy Strategy. (online) Available at: <https://gov.wales/sites/default/files/publications/2021-11/regional-energy-strategy-cardiff-capital-region.pdf> (Accessed June 2026).

<sup>78</sup> Cardiff Capital Region (2023). Cardiff Capital Region Regional Economic & Industrial Plan 2023-2028. (Online) Available at: <https://www.cardiffcapitalregion.wales/wp-content/uploads/2023/04/ccr-reip-2023.pdf> (Accessed June 2026).

decarbonisation goals (only achieving 26% decarbonisation by 2035, instead of the needed 55%). The Plan therefore seeks to encourage the development of green technologies within the region and for fundamental changes to occur within its energy market/supply towards green energy. The Plan also identifies that green energy is needed in order to secure the regions/Wales's energy security.

## Local Area Energy Plans (LAEP)

- 4.8.5 Local Area Energy Plans (LAEPs) are strategic, evidence based frameworks that set out how a defined area can transition to a net zero energy system by 2050. Developed for all Welsh local authorities as part of a national programme, LAEPs provide a locally specific roadmap of actions and investment priorities, including improving energy efficiency, increasing renewable energy generation, decarbonising heat and transport, and upgrading energy networks.
- 4.8.6 They are intended to guide decision making by local authorities, utilities and stakeholders, ensuring that development and infrastructure planning aligns with wider climate objectives, supports resilient and affordable energy systems, and contributes to achieving net zero targets
- 4.8.7 The Bridgend LAEP<sup>79</sup> provides a strategic framework for decarbonising the local energy system, including substantial growth in renewable electricity generation such as onshore wind and solar. It identifies the importance of increasing local generation to meet rising demand from electrification of heat and transport, alongside upgrades to the electricity network and supporting infrastructure. The plan promotes early delivery of renewable energy schemes as “low-regret” actions, ensuring that developments such as wind energy contribute to local energy security, carbon reduction and wider net zero objectives.
- 4.8.8 The Rhondda Cynon Taf LAEP<sup>80</sup> sets out a roadmap to achieve net zero by 2050, prioritising a significant increase in renewable energy generation, including onshore wind, to support local decarbonisation and energy resilience. The plan identifies opportunities for large-scale renewable deployment across the borough, alongside building retrofit, electrification of heating and transport, and network reinforcement. It emphasises that renewable energy development, including wind, will play a key role in reducing emissions, supporting economic growth and delivering local, low-carbon energy supply in line with regional and national targets.
- 4.8.9 The Neath Port Talbot LAEP<sup>81</sup> establishes a whole-system pathway to net zero, with a strong emphasis on the expansion of renewable energy generation, including onshore wind, supported by grid reinforcement and enabling infrastructure. It identifies the potential for significant growth in renewable capacity, positioning the area as a net exporter of low-carbon electricity, while also supporting industrial decarbonisation and economic transition. The plan highlights the need to align renewable energy deployment, including wind, with spatial “focus zones”, infrastructure investment and coordinated partnership working to deliver a resilient and low-carbon energy system.

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<sup>79</sup> Bridgend County Borough Council (2021) Local Area Energy Plan. (Online) Available at: <file:///C:/Users/UKHVM001/OneDrive%20-%20WSP%20O365/Desktop/01a%20BCBC%20LAEP%20Refresh%20Final%20Report%20v1.0%20-%202021-10-13%203.pdf> (Accessed June 2026).

<sup>80</sup> Rhondda Cynon Taf (N.D) Local Area Energy Plan (LAEP). (Online) Available at: <https://democracy.npt.gov.uk/documents/s111607/Council%2026-Feb-26%20RLDP%20Report.pdf> (Accessed June 2026).

<sup>81</sup> Neath Port Talbot Council (2024) Local Area Energy Plan 2024. (Online) Available at: <file:///C:/Users/UKHVM001/OneDrive%20-%20WSP%20O365/Desktop/npt-laep-final-english-version.pdf> (Accessed June 2026).

## 4.9 Planning Considerations

### Assessment of Compliance with National Policy

- 4.9.1 Future Wales is the primary planning policy document against which applications qualifying as DNS are to be assessed as the highest tier of the development plan. Future Wales (page. 96) confirms:

*“As set out in legislation, applications for Developments of National Significance must be determined in accordance with Future Wales, which is the national development plan for Wales.”*

- 4.9.2 Future Wales is the most up-to-date development plan and in accordance with the latest PPW. Therefore, an assessment of the Proposed Development against the policies of Future Wales is crucial to establishing the planning merits of the Proposed Development. However, understanding the compliance with the aims of PPW is also crucial to understanding the compliance with national policy.

### Benefits of the Proposed Development

- 4.9.3 Future Wales Policy 17 states that *“Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.”*
- 4.9.1 The Environment (Wales) Act 2016 (as amended) places a duty on the Welsh Ministers to reduce GHG emissions in Wales by at least 100% in 2050<sup>82</sup>. As demonstrated above, Future Wales Policy 17 requires that, *“significant weight”* must be given by decision makers to the need to meet Wales’ international commitments on climate change and the target to meet 70% of consumed energy by renewable sources by 2030.<sup>83</sup>
- 4.9.2 Consistent with Future Wales, PPW (para 5.7.15) states that *“The planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings”* whilst PPW (para 5.7.7) is also clear that *“The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance.”* Therefore, the benefits of the Proposed Development in this regard are crucial to meeting the national policy framework requirements.
- 4.9.3 Although the 70% target in policy (subsequently updated to 100% by 2035) is to be achieved through both increasing renewable energy generation and a reduction in energy consumption through improved efficiency Future Wales is clear that alternatives to large scale electricity generating infrastructure (including energy efficiency) are unable to meet the targets alone. It states that *“The Welsh Ministers have considered alternatives to the need for new large-scale electricity generation infrastructure, including building-mounted installations and energy efficiency measures. Although we believe that these measures have an important part to play in meeting our energy, decarbonisation and climate change targets, they will not enable us to meet these objectives on their own.”* (Welsh Government, 2021a: 97).
- 4.9.4 Therefore, the delivery of nationally significant renewable energy projects under the DNS regime is central to addressing the climate emergency which was declared by the Welsh

<sup>82</sup> The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021 changed the statutory target within the Environment Act from 80% to 100% and came into force on 12 March 2021.

<sup>83</sup> As noted the target has been updated to 100% of Wales’s electricity needs from renewable sources by 2035.

Government in 2019. This is synthesised through Future Wales Policy 17 which is clear that “*The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.*”

- 4.9.5 The Proposed Development would see the delivery of a combined rated output of up to 33.6MW<sup>84</sup> of electrical power. The Energy Generation Energy Generation & Use in Wales First Combined Edition (Welsh Government, 2026) sets out the data on energy generation from renewables. The report states that, in 2024, 7.9TWh of energy in Wales was from renewables and by the end of 2024 Wales had 1,285 MW of onshore wind capacity, equivalent to 70% of renewable generation capacity in Wales. In 2024, it was estimated that achievement towards the target for 100% of electricity consumption by 2035 (superseding the target of 70% by 2030) stood at 54%. With an estimated output of up to 33.6MW equating to 76 GWh per year<sup>85</sup> or 22,468 homes<sup>86</sup> the Proposed Development would therefore demonstrably support an increase in renewable generation; contributing to the achievement of Welsh Government targets.
- 4.9.6 In addition to the positive benefits for addressing climate change and enhancing the supply of renewables, the Proposed Development would also see economic benefits for the area. The Proposed Development would include the provision of approximately 57 FTE (full time equivalent) jobs during construction, based upon employment density of approximately 1.7 direct FTE jobs per MW<sup>87</sup>, or 403 FTE direct, indirect and induced jobs during the construction and project development phase<sup>88</sup>. In terms of operation, it is expected that the Proposed Development would directly employ 4 FTE for maintenance. It is estimated that the expenditure in Wales associated with the construction phase would total £13.3m whilst for the operation phase would equate to £0.99m per annum.<sup>89</sup> This level of investment would support the outcomes that Policy 33 of Future Wales which seeks to deliver investment in the South East region.
- 4.9.7 The Applicant (Pennant Walters) is a business registered in Wales, headquartered in Hirwaun, and therefore meets the Welsh Government’s definition of local ownership (Welsh Government, 2020a). The Proposed Development would therefore contribute to the Welsh Government’s local ownership of renewable energy target and support PPW paras 5.7.14 and 5.9.24.
- 4.9.8 Consistent with PPW and the Environment (Wales) Act 2016, the Proposed Development will also deliver a net benefit for biodiversity. These benefits will be quantified in the Final ES.

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<sup>84</sup> The ES assessment is based on turbines with an output of 4.2M per turbine.

<sup>85</sup> Using the Welsh average onshore capacity factor of 26%: Department for Energy Security & Net Zero (DESNZ). (2024) Regional renewable electricity in 2024. Available at: [https://assets.publishing.service.gov.uk/media/68da76bbef1c2f72bc1e4b77/Regional\\_renewable\\_electricity\\_in\\_2024.pdf](https://assets.publishing.service.gov.uk/media/68da76bbef1c2f72bc1e4b77/Regional_renewable_electricity_in_2024.pdf)

<sup>86</sup> DESNZ (2025). Regional and local authority electricity consumption statistics. Available at: <https://www.gov.uk/government/statistics/regional-and-local-authority-electricity-consumption-statistics>

<sup>87</sup> Derived from Renewables UK (2011) Working for a Greener Britain 2011. Volume 1. [https://eprints.staffs.ac.uk/1689/1/Working\\_for\\_Green\\_Britain.pdf](https://eprints.staffs.ac.uk/1689/1/Working_for_Green_Britain.pdf) (Accessed July 2026).

<sup>88</sup> Based upon Regeneris Consulting and the Welsh Economic Research Unit. Economic Opportunities for Wales from Future Onshore Wind Development 2013 (Online). Available via: <https://studylib.net/doc/18298357/economic-opportunities-for-wales-from-future-onshore-wind> (Accessed June 2026).

<sup>89</sup> Based on assumptions informed by Regeneris Consulting Ltd and Welsh Economy Research Unit, Cardiff Business School for Renewables UK Cymru, Welsh Government (2013) Economic Opportunities for Wales from Future Onshore Wind Development

## Impacts of the Proposed Development

### Landscape

- 4.9.9 Policy 17 of Future Wales establishes a presumption in favour of large-scale wind energy development (including repowering) within the Pre-Assessed Area (PAA) for Wind Energy, subject to the criteria set out in Policy 18. The Proposed Development lies predominantly within PAA 9. However, a portion of the Southern Array, including two turbines, is located outside, albeit immediately adjacent to, the PAA boundary.
- 4.9.10 In considering the Proposed Developments location both within and adjacent to the PAA, the Applicant notes that the spatial approach to onshore wind set out in Future Wales has significant limitations because of the high-level approach to constraints mapping which was adopted, an issue consistently set out by the sector/RenewableUK Cymru. This is evidenced by the work undertaken by RenewableUK Cymru which involved detailed analysis of the PAAs in Wales and concluded that only ~5% is suitable for onshore wind and are theoretically deliverable once suitable constraints are applied and operational wind farms have been excluded.
- 4.9.11 The Applicant therefore considers that, whilst the PAAs provide an important spatial framework for large-scale wind energy development, they are intended to represent a starting point for site selection rather than an absolute boundary to development. Consistent with Policies 17 and 18, land located outside, but adjacent to, a PAA may also be suitable for large-scale wind energy development where the relevant policy requirements can be satisfied.
- 4.9.12 Policy 17 acknowledges that the areas identified in the PAA for Wind Energy have already been modelled for “*the likely impact on the landscape and [the Welsh Government] has found them to be capable of accommodating development in an acceptable way*”. It should also be noted that when undertaking the modelling that Welsh Government considered wind turbines extending to a height of 250m. As such PAAs are considered to be acceptable in landscape terms for wind turbines that could potentially be 70m taller than those proposed by the Applicant.
- 4.9.13 Notwithstanding the fact that the Proposed Development sits largely within a PAA where landscape impacts have already been considered acceptable, effects upon the landscape arising from the Proposed development as a whole have been considered within draft **ES Chapter 6: Landscape and Visual Impact Assessment (LVIA)**. In terms of nationally designated landscapes, the Proposed Development would result in no direct effects on the Bannau Brycheiniog National Park, Gower National Landscape or Glamorgan Heritage Coast. Detailed assessment of indirect and cumulative effects concludes that there would be no significant effects on the special qualities, key characteristics or integrity of these designated landscapes, either alone or in combination with other wind energy developments.
- 4.9.14 In terms of local landscape designations, a number of Special Landscape Areas (SLAs) are located wholly or partly within 10 km of the Proposed Development and have been assessed within the LVIA where they coincide with the blade tip Zone of Theoretical Visibility (ZTV). The SLAs are shown on ES Figure 6.9 and described in draft ES Chapter 6. The final ES will include an assessment of the indirect landscape effects upon these local landscape designations.
- 4.9.15 The Proposed Development has been designed so as to minimise the effects upon landscape and visual receptors through the use of a non-reflective pale grey on the turbine rotors and upper towers and this will be secured through a planning condition.

- 4.9.16 The LVIA also assesses cumulative landscape effects, which is concerned with the evaluation of the effects that could be generated were the Proposed Development to become operational along with some or all of the other wind energy developments that are either already operational, have been consented or are proposed i.e. planning application or scoping opinions. Adopting a 28 km radius cumulative study area the assessment identifies which, if any, of the landscape or visual receptors would experience significant effects as a result of the incremental contribution of the Proposed Development to this cumulative baseline<sup>90</sup>.
- 4.9.17 The LVIA assesses the effects under two scenarios:
- Scenario One includes other operational (and under construction) and consented wind energy developments;
  - Scenario Two includes proposed wind energy developments. In reality, not all of these wind energy developments may be granted planning consent, and as such, the scenario represents a worst-case scenario that may never come to pass.
- 4.9.18 Under Scenario 1, significant cumulative landscape effects to which the Proposed Development would be a contributing factor are identified for the LANDMAP Visual and Sensory Aspect Areas (VSAAs) CYNONVS811 Garth Hill, CYNONVS813 Garw and Caerau Forest and CYNONVS473 Mynydd Baedan. Significant cumulative landscape effects are also identified for the Historic Landscape Aspect Area (HLAA) CYNONHL581 Llynfi Valley Agricultural and the Cultural Landscape Services Aspect Area (CLSAA) CYNONCLS099 Garth Hill. Although there are other significant cumulative landscape effects these occur as a consequence of existing and consented wind farms, and the Proposed Development is not considered to make a significant contribution to those effects.
- 4.9.19 Under Scenario 2, additional significant cumulative landscape effects are identified for the LANDMAP VSAAs CYNONVS580 St Gwynno, CYNONVS436 Mynydd Gaer and CYNONVS473 Mynydd Baedan as a consequence of planning application and scoping-stage wind energy schemes. However, for these receptors the Proposed Development is not considered to be the main contributing factor to the cumulative effect.
- 4.9.20 In relation to the special qualities of Bannau Brycheiniog National Park (BBNP), significant cumulative landscape effects are identified under Scenario 2 for the special quality of Sweeping Grandeur and Outstanding Natural Beauty but these effects are as a consequence of the Carreg Wen scoping-stage wind farm. These significant effects would occur irrespective of the Proposed Development because it does not make a significant contribution to the cumulative effect on the National Park's special qualities.
- 4.9.21 In conclusion, Welsh Government has already modelled the likely landscape effects of large-scale (250m) wind energy development within the Pre-Assessed Areas (PAAs) identified in Future Wales and concluded that these areas are capable of accommodating such development in an acceptable way. The LVIA considers the Proposed Development in its entirety and does not separate out those turbines either within or outside the PAA. The assessment identifies some localised significant landscape and visual effects, including significant cumulative effects on a number of LANDMAP landscape receptors, these effects are generally limited to specific areas and correspond with the work undertaken by Welsh Government that, overall, wind farm development in the location of the Proposed Development is acceptable and that the capacity of the wider landscape to accommodate wind energy development would not be exceeded.

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<sup>90</sup> The assessment only considers receptors where the effects of the Proposed Development alone are considered to be not significant.

## Policy 18 Criteria

- 4.9.22 Policy 18 sets out a range of criteria for DNS applications which inform consideration of impacts. The majority of the criteria (2, 4, 6, 7, 8, 9) refer to ‘unacceptable adverse impacts’ which implies that a planning judgement has to be made to determine acceptability (or otherwise) of any adverse impacts.
- 4.9.23 As demonstrated in **Table 4.2**, when taken as a whole, and the planning merits weighed, the Proposed Development accords with the criteria in Policy 18.

**Table 4.2 Assessment against Future Wales Policy 18 requirements**

| Policy 18 Criteria                                                                                                                                                                                                                                                                                 | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>1. Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)</b></p> | <p>Six of the eight wind turbines forming the Proposed Development are located within a Pre-Assessed Area (PAA) for wind energy identified in Future Wales. Accordingly, this criterion applies only to those elements located outside, but adjacent to, the PAA, consisting of two turbines within the Southern Array. As outlined in paragraphs 4.9.9 to 4.9.21, <b>Draft ES Chapter 6: LVIA</b> assesses effects on the host landscape and nationally designated landscapes, including BBNP, the Gower National Landscape and the Glamorgan Heritage Coast for the Proposed Development as a whole. The assessment concludes that there would be no significant effects on these nationally designated landscapes and, in the context of the presumption in favour of large-scale wind energy development established by Future Wales Policy 17, the identified effects are not considered unacceptable.</p> <p>Further assessment will be reported in the Final ES, including indirect effects on scoped HLAAs and local landscape designations, a Residential Visual Amenity Assessment (RVAA) (<b>Appendix 6M</b>) and a night-time assessment, including aviation lighting effects (<b>Appendix 6N</b>).</p> <p><b>Cumulative</b></p> <p>Under Scenario 1 a limited number of significant effects arising from the addition of the Proposed Development would be experienced on LANDMAO VSAA, HLAA and CLSAAs. (see 4.9.18 above). Under Scenario 2, the Proposed development would not be a contributing factor to significant landscape effects.</p> |
| <p><b>2. There are no unacceptable adverse visual impacts on nearby communities and individuals;</b></p>                                                                                                                                                                                           | <p><b>Draft ES Chapter 6: LVIA</b> assesses the likely visual impacts of the Proposed Development. The LVIA assessment finds that there are likely significant visual effects on some settlements.</p> <p>The Wind Farm Site is located on high ground with a number of relatively small, often linear settlements in the valleys which bound it. Areas within the following settlements could experience significant visual effects the degree and extent depending upon local topography, screening and orientation:</p> <ul style="list-style-type: none"> <li>• Maesteg;</li> <li>• Pontcymmer and Blaengarw;</li> <li>• Pont-y-rhyl;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

- Pont Rhyd-y-cyff;
- Croeserw;
- Bettws;
- Llangeinor;
- Llangynwyd;
- Valleys Gateway;
- Pen-y-fai.

A Residential Visual Amenity Assessment (RVAA) (**ES Chapter 6 Appendix 6M**) will be undertaken as part of the final ES to consider how the change in view arising from the operation of the Proposed Development would impact upon the residential visual amenity of the properties located within 2km of the Proposed Development and whether the impacts identified could affect living conditions at these properties. The location of individual or small groups of residential properties within 2km of the proposed turbines are illustrated in Figure 6.13 Residential Properties within 2km (Hub Height ZTV) and Figure 6.14 Residential Properties within 2km (Hub Height ZTV).

The LVIA assesses that there will be some significant visual effects on recreational receptors:

- Promoted walking routes (within 10km of the proposed turbines): Bridgend Circular Walk; Celtic Way; Cistercian Way; Coed Morgannwg Way; Glamorgan Ridgeway Walk; Taith Fford Las Ogwr/Ogwr Ridgeway Walk; Sky to Sea Over the Bwlch; Sky to Sea Through the Vale and St Illtyd's Walk.
- From sections of national cycle route NCN 885 depending on landform, vegetation or built form.
- From meadow land in the north-west of the Bryngarw Country Park.
- Open Access Land and PRow within 5km of the proposed turbines and Open Access Land and PRow between 5km-10km of the proposed turbines.

Additionally significant visual effects are identified on localised sections of one transport route (the A4063).

### Cumulative

Under Scenario 1, the cumulative assessment identifies significant cumulative visual effects for areas within some settlements, recreational routes, Bryngarw Country Park, Open Access Land and PRow, and sections of the A4063 and B4282, to which the Proposed Development would be a contributing factor. Additional significant cumulative effects also arise from other operational and consented wind farms, although the Proposed Development would not materially contribute to these effects.

Under Scenario 2 (the worst-case scenario), additional significant cumulative visual effects are identified for some settlements, recreational routes, Bryngarw Country Park, Open Access Land, PRow and the A4063. In some instances, the Proposed Development would be a significant contributing factor alongside other proposed wind energy schemes, while in other cases the

effects would arise principally from those schemes rather than the Proposed Development.

### Mitigation and conclusion

Embedded measures to reduce visual effects in the scheme include recognition that the turbine rotors and upper towers will be largely visible against the sky and therefore a non-reflective pale grey colour (with RAL 7035 identified) will be selected to minimise contrast.

Wind farms by their nature create visual effects and the role of the decision maker therefore is to consider the extent to which these effects outweigh the positive benefits of the project such that the visual effects associated with the Proposed Development subject to the planning application could be considered unacceptable. Recognition should also be given to the fact that the ES assessment commonly considers views of wind turbines to be negative when the experience of the individual may often be more nuanced.

Future Wales calls for significant weight to be attached to the positive benefits of onshore wind. The significant effects identified within the ES are of a scale and nature consistent with what could be anticipated as arising from a development of this kind within and immediately adjacent to a PAA, they are not so widespread as to outweigh the benefits which would derive from its operation.

**3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features; for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);**

International designations include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. The assessment reported in Draft **ES Chapter 8: Biodiversity** concludes that there are no likely significant effects on international site receptors given distance and spatial separation from the Proposed Development..

Draft **ES Chapter 9: Ornithology** identifies international sites designated for their ornithological value. There are none within 20km of the Wind Farm Site. The assessment concludes that there would be no adverse effects on the integrity of internationally designated sites as a result of the Proposed Development.

**4. There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;**

National designations include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs). The assessment reported in Draft **ES Chapter 8: Biodiversity** concludes that there are no likely significant effects on any SSSIs or NNRs arising from works undertaken within the Wind Farm Site. The existing forestry access tracks pass through a SSSI. Work is underway to understand whether the track requires upgrading in this location. The result of this design work and the assessment of any resulting effects upon the SSSI will be reported in the Final ES.

The outline Construction Environmental Management Plan (CEMP) would ensure appropriate management measures in place during the construction phase of the Proposed Development. Additionally, an outline HMP will support the final application. The outline HMP will set out the management and

monitoring tasks to be undertaken during the construction phase and operational phase of the Proposed Development. In particular, it will detail those management recommendations for features of ecological interest located within the development footprint including habitat features to be retained, enhanced and created. This will ensure the appropriate management and maintenance of all retained and newly created habitats/features proposed over the lifetime of the development.

Aside from Priority Habitats where ongoing surveys and mitigation design are required before effects can be fully assessed, all designated sites and protected species receptors are currently anticipated to experience negligible and not significant effects following the implementation of embedded design measures and construction mitigation. The assessment scopes in Roosting Bats; Commuting and Foraging Bats; Water Vole; and Marsh Fritillary.

Draft **ES Chapter 9: Ornithology** records that there are two nationally designated statutory sites within 10km of the Wind Farm Site that list ornithological features; Mynydd Ty-Isaf SSSI and Eglwys Nunydd Reservoir SSSI. No likely significant effects on their qualifying ornithological interests are anticipated. A Collision Mitigation and Monitoring Strategy (CMMS) will be secured via DNS condition.

In conclusion, the ecological and ornithological assessments reported within the Draft ES demonstrate that there would be no direct effects upon nationally designated sites within the Wind Farm Site whilst effects arising from the use of the existing forestry access tracks will be confirmed in the final ES. Indirect effects on nationally designated sites would be not significant. Mitigation measures will include for implementation of the outline CEMP and CMMS. There will be no unacceptable effects.

**5. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;**

As set out within the Green Infrastructure Statement (GIS), the step-wise approach has been applied to ensure that habitat loss is avoided where practicable, minimised where avoidance is not possible, and that impacts on protected and priority species are appropriately mitigated where necessary. In terms of biodiversity enhancement, an Outline Habitat Management Plan (oHMP) and Net Benefit for Biodiversity (NBB) Statement will be prepared and submitted with the final application. These documents will set out the objectives for biodiversity protection, mitigation, monitoring, habitat restoration and enhancement measures, as appropriate, identify opportunities to link habitats on site with those off-site and will explain how the Proposed Development contributes towards the delivery of biodiversity net benefit in accordance with relevant planning policy requirements.

**6. There are no unacceptable adverse impacts on statutorily protected built heritage assets;**

Draft **ES Chapter 7: Historic Environment** explores the likely effects on cultural heritage, including consideration of statutorily protected built heritage assets. There are no designated historic assets located within either the Northern or the Southern Array. The existing forestry access tracks cross the western boundary of the Rhondda registered historic landscape (Cadw: HLW (MGI) 5)

and traverse through the boundary of the Clawdd Mawr, Mynydd Caerau scheduled monument (Cadw: GM231). There are no further designated historic assets (world heritage sites, listed buildings, registered historic parks and gardens, conservation areas) recorded within the Wind Farm Site boundary.

Overall, the historic environment assessment identifies no significant heritage effects during either the construction or operational phases. Therefore, it is concluded that the impacts are not unacceptable.

**7. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;**

Draft **ES Chapter 14: Shadow Flicker** assesses the likely impacts by way of shadow flicker. The Applicant is committed to installing a shadow flicker control module where required. This module can control a specific turbine (or turbines) which would be programmed to shut down on specific dates at specific times when the sun is bright enough, there is sufficient wind to rotate the blades and the wind direction is such that nuisance shadow flicker could occur. Overall, no significant effects on residential properties are considered likely with this mitigation.

Draft **ES Chapter 13: Noise** assesses the potential effects associated with noise. The assessment concludes that construction noise and construction traffic noise would not give rise to significant effects. With regard to the operational phase, the operational noise assessment is currently being prepared and will be undertaken in accordance with the methodology set out in ES Chapter 13. Following completion of the operational noise assessment, it will be determined whether any additional mitigation measures are required.

With regards to electromagnetic disturbance draft **ES Chapter 16: Aviation, Radar, Telecommunications and Utilities** identifies that degradation of signals is possible as a result of consultation with stakeholders. However, discussions with Airwaves Solutions are ongoing to understand potential mitigation and the results, including any mitigation will be reported in the final ES.

With regard to air quality, draft **ES Chapter 12: Traffic and Transport** concludes that construction traffic would lead to only negligible increases in traffic above baseline levels. Consequently, significant air quality effects associated with construction traffic are not anticipated and can be managed via the outline CEMP and Construction Traffic Management Plan (CTMP).

**8. There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);**

Draft **ES Chapter 16: Aviation, Radar, Telecommunications and Utilities** assesses the likely effects on aviation and telecommunications. In relation to aviation, the Wind Farm Site is located within Low Flying Area (LFA) 7, a military low-flying training area. An independent assessment was undertaken by Wind Farm Aviation Safeguarding Ltd, which concluded that the Proposed Development would not result in significant effects on Ministry of Defence (MoD) operations. An aviation lighting scheme, including MoD-compliant infra-red lighting, will be developed in consultation with the MoD and the Civil Aviation

Authority (CAA) and implemented in accordance with their requirements. The lighting scheme will be provided as part of the final ES.

The proposed turbines have the potential to be visible to radar systems at Cardiff Airport. A radar assessment has been undertaken and will be supplemented by a NATS Technical and Operational Assessment (TOPA). The Applicant is continuing to engage with NATS and Cardiff Airport to agree an appropriate technical solution and, where necessary, suitable planning controls to ensure any effects on radar operations are appropriately managed. The results of this consultation, and any measures agreed to mitigate effects on radar, will be made available to consider with the application once an agreed approach has been finalised. Similar matters have been successfully addressed at other wind farm developments through the implementation of technical mitigation and planning conditions.

**9. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;**

Draft **ES Chapter 12: Traffic and Transport** assesses the potential effects on the transport network and assesses the A4107 and A4061 (Rhigos Road). Based on the construction programme the wind farm construction traffic results in an approximate peak of 73 HGV movements per 12 hour day.

The assessment scopes out highways effects from further assessment based on the Environmental Assessment of Traffic and Movement (EATM) thresholds. There is negligible change on severance, driver delay, pedestrian delay and amenity, fear and intimidation (of pedestrians and cyclists), and on accidents and safety. Operational traffic will be negligible and the ES scopes this out from assessment.

The ES chapter is also supported by an Abnormal Indivisible Loads (AIL) access study (within **Appendix 12C**) which provides details including the proposed AIL route. The following route is identified as the preferred route for AIL transit: Swansea Docks > Baldwins Crescent > A483 > M4 > A465 > A4061 > Site. The study identifies a number of constraint locations where mitigation will be required.

An Outline Construction Traffic Management Plan (CTMP) has also been prepared (**Appendix 12B**). This sets out the management of daily delivery profiles and control construction vehicle movements and routeing of HGVs to/from the Proposed Development.

**10. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;**

The Proposed Development has been designed so as to minimise the materials needed during construction. The materials required include stone, which is anticipated to be sourced from local quarries (see Chapter 4 of the ES).

Draft **ES Chapter 11: Ground Conditions** confirms that the Wind Farm Site is predominantly classified as Agricultural Land Classification (ALC) Grade 5, with localised areas of Grade 4 within the Northern and Southern Arrays. The forestry access

track is predominantly located on non-agricultural land, with some localised areas of Grades 4 and 5. The Proposed Development would not affect any areas of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 or 3a). Consequently, effects on agricultural land quality are not considered significant and were scoped out of detailed assessment, an approach agreed with LQAS and PEDW.

Embedded mitigation measures will ensure that displaced soils are reused within the Wind Farm Site where practicable, soil stockpiles are retained for the shortest possible period, and measures to minimise soil compaction are incorporated within the outline Construction Environmental Management Plan (CEMP).

In addition, a peat depth survey has been completed for the Northern and Southern Array and has confirmed the absence of peat within these areas. Peat surveys will be completed for the forestry access track to identify whether any peat is present along the route. This data will inform detailed design, to enable the Proposed Development to avoid peat where possible and will inform the assessment in the Final ES. If peat cannot be avoided, then a Peat Management Plan (PMP) will be developed for the Proposed Development and appended to the CEMP.

Construction activities will be undertaken in accordance with a CEMP, which will be secured by planning condition and for which an outline version accompanies the application. The CEMP will include measures for the management of waste during construction and will include measures for the temporary storage and handling of soils. Collectively, these measures will support the sustainable use and management of resources throughout the construction phase. No materials are expected to be generated or removed from the Wind Farm Site during the operational phase of the Proposed Development.

**11. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.**

Draft **ES Chapter 4: Development Description** sets out the likely approach to decommissioning. The options for the end of the 30 year lifespan are to apply for continuation of existing wind turbines, to repower the Proposed Development using new turbines or for decommissioning and reinstatement. For the purposes of the ES assessment decommissioning is assumed. The design allows for decommissioning and recycling/reuse of materials where appropriate to do so. No stone would be removed. Tracks would either be left for use by the landowner or covered with topsoil. The approach to and timescale of decommissioning will be controlled by planning condition.

**The cumulative impacts of existing and consented renewable energy schemes should also be considered.**

The ES sets out an assessment of the cumulative effects of the Proposed Development in combination with existing and consented renewable energy schemes within the topic-specific chapters (Chapters 6 to 17). Chapter 2 outlines the approach to the cumulative assessment. The assessments completed to date indicate that, aside from landscape and visual effects for certain receptors, no significant cumulative effects are anticipated. Significant cumulative landscape and visual effects are identified

for some landscape, visual and recreational receptors; however, these effects are generally localised and represent a consequence of a wind energy development of this scale within a landscape where renewable energy development is already present (and considered acceptable within the PAA). Some topic assessments remain ongoing, and the findings of this work will be reported in the Final ES. Subject to the completion of the remaining assessment work and any necessary mitigation, no unacceptable cumulative effects are anticipated.

- 4.9.24 **Section 4.3** sets out the TAN considered relevant to the Proposed Development. The performance of the Proposed Development against the TANs is set out within **Table 4.3**.

**Table 4.3 Assessment against Technical Advice Note requirements**

| TAN                                                                               | Assessment of Proposed Development                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Technical Advice Note 5: Nature Conservation and Planning (1996)</b>           | Draft <b>ES Chapter 8: Biodiversity</b> concludes that, with the implementation of embedded mitigation and good practice measures, effects on designated sites and protected species are anticipated to be negligible and not significant. While further survey work and mitigation design are ongoing in relation to Priority Habitats, opportunities for habitat enhancement and biodiversity improvement will be identified and incorporated into the Proposed Development where appropriate. |
| <b>Technical Advice Note 6: Planning for Sustainable Rural Communities (2000)</b> | The Proposed Development would comply with the TAN as the provision of renewable energy developments is considered likely to be an appropriate use at farm locations.                                                                                                                                                                                                                                                                                                                            |
| <b>Technical Advice Note 11: Noise (1997)</b>                                     | Draft <b>ES Chapter 13: Noise</b> has been prepared in accordance with the relevant guidance. The operational noise assessment is ongoing and will be reported in the final ES. Compliance with relevant noise limits and guidance will be confirmed through the completed assessment.                                                                                                                                                                                                           |
| <b>Technical Advice Note 12: Design (2016)</b>                                    | The Proposed Development is designed to make the most effective use of the land for wind power generation with effects mitigated as far as is possible for development of this type. The DAS provides further detail about the site context and character, movement and access arrangements and considerations, and community safety. The Proposed Development complies with the requirements of TAN 12.                                                                                         |
| <b>Technical Advice Note 23: Economic Development (2014)</b>                      | The Proposed Development would lead to investment in the local and regional economy and the provision of employment in the construction and operational phase. The ES (Draft <b>Chapter 15: Socio-economics</b> ) sets out further consideration of the effects.                                                                                                                                                                                                                                 |

**Technical Advice Note 24: The Historic Environment (2026)**

Draft **ES Chapter 7: Historic Environment** concludes that the Proposed Development would not give rise to any significant effects on designated or non-designated heritage assets (accepting that further information is required in relation to any works necessary or otherwise to upgrade the existing forestry access track which passes through the Clawdd Mawr, Mynydd Caerau Scheduled Monument (GM231)).

During construction, a small number of non-designated archaeological features may be subject to localised physical impacts associated with the access tracks within the arrays, turbine infrastructure and the overhead line connection; however, all identified effects are assessed as minor adverse and not significant. During operation, the assessment concludes that there would be no significant effects on the setting or significance of Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Landscapes or Registered Historic Parks and Gardens. The potential for effects on previously unknown buried archaeological remains will be addressed through consultation with Heneb and the implementation of appropriate archaeological mitigation measures, secured through planning conditions where required.

**Assessment of compliance with the Local Development Plan**

4.9.25 **Table 4.4** summarises the development’s performance against what are considered to be the key LDP policy criteria set out on a topic basis. The conclusion of the assessment in **Table 4.4** is that the Proposed Development supports the strategic objectives of the BCBC RLDP, particularly in relation to renewable energy generation, climate change mitigation and sustainable growth. Whilst the draft ES identifies some localised significant landscape and visual effects, these are an anticipated consequence of a wind energy development of this scale and are not considered unacceptable in planning terms, particularly when weighed against the substantial renewable energy and decarbonisation benefits of the scheme. Subject to the completion of ongoing assessment work, the Proposed Development is considered to accord with the relevant policies of the RLDP.

**Table 4.4      Assessment against the BCBC RLDP**

| Adopted LDP Policy                                       | Policy Summary                                                                                                                                                 | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SP1: Regeneration and Sustainable Growth Strategy</b> | Requires the proposal to demonstrate alignment with the Plan’s strategic spatial approach, sustainability objectives and infrastructure led growth principles. | The Proposed Development will support the overarching objectives of Policy SP1 by contributing to sustainable development and the transition to a low-carbon economy. The Proposed Development will generate renewable electricity, support local employment and expenditure during construction, and provide investment within the local area. As such, the proposal supports the Plan’s wider objectives of sustainable growth and economic prosperity. |

### SP3: Good Design and Sustainable Placemaking

Requires all development to deliver high-quality design and adopt a sustainable placemaking approach, creating attractive, healthy and well-connected places that respond positively to their natural, historic and built context.

The draft **DAS** and draft **ES Chapters 3 and 4** provide further information on the design of the Proposed Development and the approach undertaken to inform the design. This has included consideration of context and character, with further detail set out in topic specific ES chapters. The Proposed Development would support effective design of a wind farm that takes into account the environmental impacts and is an efficient use of land. Measures to protect biodiversity, minimise pollution risks, manage surface water and safeguard surrounding land uses are embedded within the proposals and associated mitigation commitments.

The Proposed Development will contribute to climate change mitigation through the generation of renewable energy. Where practicable, materials and services will be sourced locally to support the local economy and reduce transport-related emissions associated with construction. As such, the development demonstrates alignment with the principles of good design and placemaking set out in Policy SP3.

### SP4: Mitigating the Impact of Climate Change

Requires all development proposals to contribute positively to climate change mitigation and adaption.

The Proposed Development will make a positive contribution towards climate change mitigation through the generation of renewable electricity. As set out in **ES Appendix 2A** Carbon Balance report, the development could generate sufficient electricity to meet the equivalent annual demand of approximately 22,468 homes and avoid around 34,152 tonnes of CO<sub>2</sub>e emissions per year, resulting in an estimated saving of around one million tonnes of CO<sub>2</sub>e over its operational lifetime. Measures to protect and enhance habitats, manage surface water, prevent pollution and safeguard natural resources are embedded within the design and mitigation strategy. Materials and services will be sourced locally where practicable to reduce transport emissions and support the local economy. Accordingly, the Proposed Development will make a positive contribution towards climate change mitigation and adaptation in accordance with Policy SP4.

### SP5: Sustainable Transport and Accessibility

Requires development to minimise the need to travel and reduce reliance on private cars. The policy also seeks to protect and enhance active travel routes, support delivery of local transport improvements, mitigate impacts on the highway network, reduce transport-related emissions, and

Draft **ES Chapter 12: Traffic and Transport** provides an assessment of the impacts on traffic and transport and concludes that no significant effects would arise on the surrounding transport network. The assessment confirms that the Proposed Development does not overlap with any existing or proposed active travel routes identified within the Bridgend County Borough Active Travel Network Maps. Public Rights of Way and National Cycle Network routes within and around the Proposed Development have been identified and will be managed through the Outline Public Rights of Way Management Plan (**Appendix 12A** of the ES).

ensure appropriate parking and infrastructure.

An Outline Construction Traffic Management Plan (CTMP) accompanies the submission (**Appendix 12B** of the ES). This will be implemented to secure safe and effective access arrangements during construction. The CTMP includes measures to ensure the safe, efficient and sustainable movement of people and materials, minimise construction traffic and associated disruption, and reduce impacts on local communities and the strategic and local highway network. Whilst the rural location of the Proposed Development means that walking and cycling are not considered a practical means of access for the construction workforce, contractors will be encouraged to minimise travel impacts through measures such as car sharing and minibuse use where practicable. Accordingly, the Proposed Development will not have an adverse effect on the safe or efficient operation of the transport network.

**PLA9:  
Development  
Affecting  
Public Rights  
of Way**

Requires development to link with and seek to minimise impacts on the PRow network

The effects of the Proposed Development on Public Rights of Way (PRow) have been assessed as part of draft **ES Chapter 12: Traffic and Transport**. The assessment identifies a number of PRow within the Wind Farm Site and concludes that effects during construction would be temporary and limited to minor delays to users. During operation, no permanent PRow diversions or closures are proposed and whilst there may be minor effects on user amenity along limited sections of some routes, these effects are assessed as not significant. An Outline Public Rights of Way Management Plan (**Appendix 12A** of the ES) accompanies the submission. This sets out mitigation and management measures including signage, bankpersons and route inspections, with the final plan to be agreed with the relevant PRow officers prior to construction. Accordingly, the Proposed Development minimises impacts on the PRow network and includes appropriate mitigation to safeguard the character, safety, enjoyment and convenient use of affected routes, in accordance with Policy PLA9.

**SP10:  
Infrastructure**

Requires proposals to demonstrate that they are supported by adequate infrastructure capacity or will contribute to the timely provision of necessary infrastructure required to make the development acceptable.

The Proposed Development will be supported by the infrastructure necessary for its construction, operation and decommissioning and has been informed by a comprehensive programme of technical assessments and consultation. Appropriate mitigation measures relating to transport, ecology, hydrology, cultural heritage and public access have been identified where required, and the development will make a significant contribution to renewable energy generation and climate change mitigation. Accordingly, the Proposed Development accords with the objectives of Policy SP10.

**SP13:  
Renewable and  
Low Carbon  
Energy  
Development**

Supports renewable and low carbon energy development where proposals avoid unacceptable environmental, landscape, transport and amenity impacts, provide for restoration and grid connection, and do not give rise to cumulative effects.

The Proposed Development comprises a renewable energy development that will make a significant contribution towards national and local renewable energy and carbon reduction targets. The layout has been informed by an iterative design process which has sought to minimise environmental effects, including landscape and visual impacts, whilst maintaining a viable renewable energy scheme.

The effects of the Proposed Development on landscape character and visual amenity have been assessed in draft **ES Chapter 6: Landscape and Visual Impact Assessment**, which concludes that, whilst significant landscape, visual and cumulative effects would occur for some receptors, these are generally localised and are an expected consequence of a wind energy development of this scale. Furthermore, 6 of the 8 wind turbines would be located within PAA9 where national policy considers landscape effects to be acceptable.

The draft ES identifies no significant effects on nationally designated landscapes, the historic environment, ornithology, local communities or highway safety. A Residential Visual Amenity Assessment (RVAA) will be undertaken and reported in **Appendix 6M** of the Final ES to assess effects on residential properties within 2 km of the proposed turbines. In relation to ecology, ongoing NVC survey work and the development of mitigation measures mean that a likely significant effect on Priority Habitat cannot currently be ruled out on a precautionary basis and will be considered further in the Final ES.

The Proposed Development can be connected to the electricity network and includes appropriate provisions for the restoration and aftercare of the land following decommissioning. Accordingly, the Proposed Development accords with the objectives of Policy SP13.

**ENT12:  
Development  
in Mineral  
Safeguarding  
Zones**

Seeks to safeguard mineral resources by ensuring that development within mineral safeguarding areas does not unnecessarily sterilise minerals. Proposals must demonstrate that extraction is either not viable, would not be prejudiced by the development, or that any temporary development can be restored within the timeframe required for future mineral working.

The Proposed Development is located within Category 1 and Category 2 Sandstone Mineral Safeguarding Areas. However, these safeguarding areas cover a substantial proportion of northern Bridgend County Borough and the land affected by the Proposed Development represents only a small fraction of the overall safeguarded resource. The Proposed Development has a finite operational life of 30 years, after which it may be decommissioned. Whilst some limited infrastructure may remain in situ (subject to an approved scheme for decommissioning), the sandstone resource would not be permanently sterilised. The proposal would not unacceptably prejudice the future extraction of the safeguarded mineral resource and is therefore consistent with the objectives of Policy ENT12.

|                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SP17:<br/>Conservation<br/>and<br/>Enhancement<br/>of the Natural<br/>Environment</b> | <p>Seeks to protect and enhance the natural environment by resisting development that would harm landscape character, biodiversity, natural resources or the integrity of the countryside. It affords strong protection to designated sites, requiring Habitats Regulations Assessment where relevant, and permits development only where it can be demonstrated that there would be no adverse effects.</p> | <p>The effects of the Proposed Development on biodiversity and ornithology have been assessed in draft <b>ES Chapter 8: Biodiversity</b> and draft <b>ES Chapter 9: Ornithology</b>. These assessments identify potential effects on ecological and ornithological receptors and set out appropriate mitigation, compensation and enhancement measures where required. The assessments conclude that, following implementation of the proposed mitigation measures, effects on designated sites and protected species would be negligible and not significant. Ongoing survey work and mitigation design are being undertaken in relation to Priority Habitats and ornithological receptors, and these will be reported in the Final ES. Opportunities to deliver biodiversity enhancement and long-term habitat management will also be identified and incorporated into the Proposed Development where appropriate.</p> <p>The effects of the Proposed Development on the water environment, soils and ground conditions have been assessed in draft <b>ES Chapter 10: Water Environment</b> and draft <b>ES Chapter 11: Ground Conditions</b>. Appropriate mitigation measures are embedded within the design and construction strategy to protect water resources, soils and other natural resources.</p> <p>Landscape and visual effects have been assessed in draft <b>ES Chapter 6: Landscape and Visual Impact Assessment</b> (see SP13 above).</p> <p>Taking account of the embedded mitigation measures, the draft ES concludes that there would be no significant adverse effects on the water environment, ground conditions, land contamination or human health. Whilst ongoing ecological and peatland survey work means that a likely significant effect on Priority Habitat, and the potential for significant effects associated with high-sensitivity peat soils, cannot currently be ruled out on a precautionary basis, these matters are being assessed further and will be reported in the Final ES. Subject to the completion of this remaining assessment work and any necessary mitigation identified through that process, the Proposed Development is considered accord with the objectives of Policy SP17.</p> |
| <b>DNP1:<br/>Development<br/>in the<br/>Countryside</b>                                  | <p>Seeks to conserve and enhance the countryside by maintaining a presumption against development outside settlement boundaries, except for specified uses including renewable energy. Acceptable development must be sustainable,</p>                                                                                                                                                                       | <p>The Proposed Development is located within the countryside; however, Policy DNP1 expressly supports renewable energy projects in such locations. The Proposed Development is also acceptable in principle under the policy framework set out in Future Wales, as the application site is predominantly located within a Pre-Assessed Area (PAA) for Wind Energy. The location has been selected through an iterative design process and requires a countryside location due to the nature of wind energy development and the wind resource</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

respect natural and cultural heritage, and prioritise the re-use of existing buildings and previously developed land where possible.

available. As a renewable energy project that will contribute towards national and local renewable energy generation and decarbonisation objectives, the Proposed Development is consistent with the objectives of Policy DNP1.

**DNP5: Local and Regional Nature Conservation Sites**

Seeks to protect local and regional nature conservation sites by resisting development that would harm their ecological or geological value, unless the benefits outweigh the harm or it can be appropriately mitigated or compensated.

A small section of the Southern Array boundary overlaps the Nant-y-Fforest SINC, although the overlap is very limited. The Proposed Development has been informed by ecological surveys and has sought to avoid and minimise effects on designated sites through iterative design and embedded mitigation measures. Draft **ES Chapter 8: Biodiversity** concludes that effects on designated nature conservation sites would be negligible and not significant following the implementation of mitigation measures. Opportunities for habitat enhancement and long-term ecological management will also be incorporated where appropriate, with further details set out in a NBB statement in due course. Accordingly, the Proposed Development accords with the objectives of Policy DNP5.

**DNP6: Biodiversity, Ecological Networks, Habitats and Species**

Requires development to deliver a net benefit for biodiversity, maintain and enhance ecological networks, and support ecosystem resilience. Proposals must retain and enhance green infrastructure where possible, avoid harm to habitats and species, and minimise impacts through design. Where harm is unavoidable, it must be justified, mitigated, or compensated to ensure no loss and where possible a net gain in biodiversity, supported by appropriate ecological assessment.

The Proposed Development has been informed by ecological and ornithological surveys and has sought to avoid and minimise effects on habitats, ecological networks and protected species through iterative design and embedded mitigation measures. Draft **ES Chapter 8: Biodiversity** and draft **ES Chapter 9: Ornithology** conclude that effects on designated sites and protected species would be negligible and not significant following mitigation. Whilst ongoing surveys and mitigation design for Priority Habitats and ornithological receptors will be reported in the Final ES, opportunities for habitat enhancement and long-term ecological management will also be incorporated. The Proposed Development therefore accords with Policy DNP6.

**DNP7: Trees, Hedgerows and Development**

Requires proposals to demonstrate that they will not adversely affect trees, woodlands or hedgerows of amenity, ecological or cultural value, or those providing important ecosystem services. If any trees are affected the proposals must be

The Proposed Development has been designed to avoid and minimise effects on trees, woodlands and hedgerows where practicable. Constraints have informed the layout, and embedded mitigation measures, including micro-siting, will be implemented to protect sensitive habitat features. Any unavoidable vegetation loss will be minimised and managed through the ecological mitigation and habitat management measures secured as part of the Proposed

supported by a BS 5837 compliant assessment. Where tree loss is unavoidable, a replacement planting and aftercare scheme must be agreed prior to development.

Development. Accordingly, the Proposed Development accords with the objectives of Policy DNP7.

#### **DNP8: Green Infrastructure**

Requires development to integrate with, protect and enhance existing green infrastructure, improving its extent, quality, connectivity and multifunctionality. Where loss is unavoidable it is advised that appropriate mitigation and compensation measures must be provided. The policy also requires all major developments to be supported by a Green Infrastructure Assessment.

The Proposed Development has been designed to integrate, protect and enhance green infrastructure assets and is supported by a Green Infrastructure Statement submitted as part of the application. The design and mitigation strategy seeks to maintain ecological connectivity, protect existing habitats and natural features, and deliver habitat enhancement where appropriate. Where impacts on green infrastructure cannot be entirely avoided, mitigation and compensation measures have been identified through the EIA process. Accordingly, the Proposed Development accords with the objectives of Policy DNP8 by protecting and enhancing the extent, quality, connectivity and multifunctionality of the green infrastructure network.

#### **DNP9: Natural Resource Protection and Public Health**

Seeks to protect natural resources and public health by ensuring development does not cause or worsen unacceptable risks from pollution, contamination, land instability or other environmental hazards. Proposals must demonstrate that impacts can be avoided or mitigated, with particular regard to sensitive uses and flood risk, supported by appropriate assessments where required.

The Proposed Development has been informed by detailed assessments of biodiversity, water resources, ground conditions, noise and other environmental effects. Embedded mitigation measures, together with commitments secured through the outline Construction Environmental Management Plan (CEMP) and other management plans, will avoid or minimise effects on natural resources and public health. Taking account of the mitigation measures incorporated within the Proposed Development, the draft ES concludes that there would be no significant adverse effects on the water environment, ground conditions, contamination, land stability or human health. The operational noise assessment, together with assessments of potential effects on Priority Habitats and peat soils, remains ongoing and will be reported in the Final ES. Subject to the completion of this remaining assessment work and any necessary mitigation, the Proposed Development is considered to accord with the objectives of Policy DNP9.

#### **SP18: Conservation of Historic Environment**

Requires proposals to demonstrate that they protect, conserve and, where appropriate, enhance the significance of heritage assets and their settings, with a strong presumption in favour of their preservation.

**Draft ES Chapter 7: Historic Environment** concludes that the Proposed Development would not give rise to any significant adverse effects on designated or non-designated heritage assets. While some localised construction effects on archaeological features may occur, these are assessed as minor and not significant. Operational effects on the setting of heritage assets, including Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Landscapes

and Registered Parks and Gardens, are also assessed as not significant. Appropriate archaeological mitigation for any previously unknown remains will be secured through consultation with Heneb and planning conditions where required. Accordingly, the Proposed Development accords with Policy SP18.

- 4.9.26 As outlined in **Section 2.3**, access to the Wind Farm Site will be achieved via existing access tracks which serve the operational Pen y Cymoedd and Llynfi Afan Wind Farms and traverse the RCTCBC and NPTCBC authority areas. The Proposed Development will require upgrades to these tracks. At this stage, surveys, assessment and design work relating to the forestry access track remain ongoing. The final ES will identify the required upgrades along the route and assess any environmental effects. Accordingly, **Tables 4.5** and **4.6** provide a topic-based summary of the Proposed Developments compliance with the key policy requirements of the RCT and NPT LDP's as assessed at this stage.
- 4.9.27 The Rhondda Cynon Taf Local Development Plan (LDP) is time-expired, with its plan period having ended in 2021. Future Wales therefore forms the most up-to-date element of the development plan framework for the area. Where policies within the RCT LDP conflict with, or are inconsistent with, the provisions of Future Wales, reduced weight is afforded to those policies in the assessment of the Proposed Development.

**Table 4.5 Assessment against the RCT LDP**

| Adopted LDP Policy                   | Policy Summary                                                                                                                                                                                                                                                                                                                                                                         | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CS1: Development in the North</b> | Policy CS1 supports sustainable growth in the Northern Strategy Area by directing development to key settlements, promoting regeneration and reuse of brownfield land, improving accessibility and sustainable transport, supporting economic diversification, and protecting the natural and cultural environment, in order to reduce out-commuting and strengthen local communities. | The section of the access route located within RCT falls within the Northern Strategy Area identified by Policy CS1. The Proposed Development would utilise and upgrade existing access infrastructure associated with the operational Pen y Cymoedd and Llynfi Afan Wind Farms, thereby limiting the need for new access provision. The Proposed Development would support investment in the area through construction and operational expenditure. The Proposed Development is therefore consistent with the overarching objectives of Policy CS1. |
| <b>CS10: Minerals</b>                | Policy CS10 seeks to safeguard mineral resources and ensure a sustainable supply by maintaining adequate reserves, protecting areas of known resources from                                                                                                                                                                                                                            | The forestry access track to A4061 Rhigos Road is within a safeguarding area for sandstone. However, the Proposed Development principally comprises upgrades to existing access infrastructure and the extent of land affected by the access track works represents a very small proportion of the wider safeguarded mineral resource. Detailed assessment of the forestry access                                                                                                                                                                    |

sterilisation, and encouraging prior extraction where appropriate.

track remains ongoing and will be reported in the final ES. Subject to the outcome of those assessments, the Proposed Development is not expected to conflict with the objectives of Policy CS10.

#### **AW5: New Development**

Policy AW5 supports development where it is well-designed, protects local character and amenity, and is compatible with surrounding uses. Proposals must be accessible by sustainable transport, minimise reliance on the private car, and provide safe access and appropriate parking without causing unacceptable traffic impacts.

The Proposed Development will utilise and upgrade existing access infrastructure. Detailed assessment and design of the forestry access track remain ongoing and will be reported in the final ES. Subject to the findings of those assessments, the Proposed Development is anticipated to accord with the relevant provisions of Policy AW5 in relation to access, transport and environmental effects.

#### **AW6: Design and Placemaking**

Policy AW6 supports high-quality design and placemaking by requiring development to reflect local character, integrate landscaping, promote sustainable transport and connectivity, and make efficient use of land.

The Proposed Development has been designed to utilise existing infrastructure and minimise environmental effects where practicable. Detailed assessment and design of the forestry access track remain ongoing and will be presented in the final ES. Subject to the outcome of those assessments, the Proposed Development is anticipated to comply with the relevant provisions of Policy AW6 relating to environmental protection, biodiversity and sustainable design.

#### **AW7: Protection and Enhancement of the Built Environment**

Policy AW7 seeks to protect and enhance the built and historic environment by requiring development affecting heritage or archaeological assets to preserve or enhance their character and appearance. It states that development proposals which affect areas of public open space, allotments, public rights of way, bridleways and cycle tracks will only be permitted in certain circumstances.

The existing forestry access track would be used where practicable. Detailed assessment and design of any required access track improvements remain ongoing and will be reported in the Final ES. The existing forestry access track crosses the western boundary of the Rhondda Registered Historic Landscape (HLW (MGI) 5) and passes through the boundary of the Clawdd Mawr, Mynydd Caerau Scheduled Monument (GM231). Once the extent of any upgrade works has been defined, the potential effects on heritage assets, archaeological remains and public rights of way will be fully assessed, and any necessary mitigation measures identified. Subject to the findings of the ongoing assessment, the access track improvements are anticipated to accord with the objectives of Policy AW7.

#### **AW8: Protection and Enhancement of the Natural Environment**

Policy AW8 seeks to protect and enhance the natural environment by resisting development that would harm locally designated sites or features of

The section of the access route located within RCT may interact with locally designated ecological interests. At this stage, surveys, assessment and design work relating to the access track remain ongoing. The final ES will identify the required upgrades and assess any associated environmental effects, including effects on the SINC and its qualifying features. The Proposed

ecological and landscape importance.

Development has sought to make use of existing access infrastructure where possible in order to minimise disturbance. Ecological surveys and assessments are being undertaken to inform the design process and identify any mitigation, compensation or enhancement measures required. Subject to the findings of the ongoing assessment, the Proposed Development is anticipated to satisfy the requirements of Policy AW8 by avoiding unacceptable impacts on the features of the SINC and securing appropriate mitigation where necessary.

**AW10:  
Environmental  
Protection and  
Public Health**

Policy AW10 seeks to protect environmental quality and public health by resisting development that would cause unacceptable harm through pollution, contamination, land instability, flooding or other hazards.

Detailed assessment and design of the forestry access track remain ongoing and will be reported in the final ES. The assessment will consider potential effects relating to noise, water environment, land stability, contamination and flood risk, with mitigation identified where required. Subject to the outcome of those assessments, the access track improvements are anticipated to accord with Policy AW10.

**AW14:  
Safeguarding  
of Minerals**

Policy AW14 seeks to safeguard mineral resources by resisting development that would unnecessarily sterilise or hinder their extraction. It protects identified areas of sand and gravel, sandstone, limestone and coal, and applies buffer zones around active quarries to ensure continued operation.

The section of the access route located within RCT is within a safeguarding area for sandstone. However, the Proposed Development principally comprises upgrades to existing access infrastructure and the extent of land affected by the access track works represents a very small proportion of the wider safeguarded mineral resource. Detailed assessment of the forestry access track remains ongoing and will be reported in the final ES. Subject to the outcome of those assessments, the Proposed Development is anticipated to comply with Policy AW14.

**NSA25: Special  
Landscape  
Areas**

Policy NSA25 identifies Special Landscape Areas and requires development within them to achieve high standards of design, siting and materials that are appropriate to, and conserve, the character and quality of the landscape.

Parts of the access route may interact with Special Landscape Areas. Detailed assessment however, the Proposed Development principally comprises upgrades to existing access infrastructure. The design of the forestry access track remains ongoing and will be reported in the final ES. Subject to the outcome of those assessments, the access track improvements are anticipated to be designed and sited to minimise effects on landscape character and to accord with the requirements of Policy NSA 25.

**Table 4.6 Assessment against the NPT LDP**

| Adopted LDP Policy                                        | Policy Summary                                                                                                                                                                                                                                                                                                           | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SC1: Settlement Limits</b>                             | Policy SC1 directs development to within defined settlement limits. Outside settlement limits, development is strictly controlled and only permitted for specific uses.                                                                                                                                                  | The Proposed Development is located outside settlement limits. However, it comprises energy generation infrastructure and associated access works and therefore falls within criterion 10 of Policy SC1, which expressly supports development associated with energy generation. The Proposed Development therefore accords with the policy in principle.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>EN2: Special Landscape Areas</b>                       | Policy EN2 designates Special Landscape Areas and seeks to protect their high landscape value by only permitting development where it can be demonstrated that there would be no significant adverse impact on their defining characteristics.                                                                           | Parts of the access route may interact with Special Landscape Areas. The Proposed Development would utilise and upgrade existing access infrastructure, thereby limiting the extent of new ground disturbance within the designation. At this stage, surveys, assessment and design work relating to the forestry access track remain ongoing. The final ES will identify the required upgrades and assess any associated landscape and visual effects. Subject to the findings of those assessments, the limited extent of works within the SLA is not anticipated to give rise to significant adverse effects on the features and characteristics for which the designation has been made. The Proposed Development is therefore anticipated to accord with Policy EN2.                                 |
| <b>SP15: Biodiversity and Geodiversity</b>                | Policy SP15 seeks to protect, conserve and enhance biodiversity and geodiversity by safeguarding internationally, nationally, and locally designated sites, as well as important habitats, species and geological features. Development must avoid harm and support the long-term management of natural heritage assets. | The section of the existing forestry access track within NPT may interact with a designated site (SSSI). At this stage, surveys, assessment and design work to understand what works, if any, are required to upgrade the track remain ongoing. The final ES will identify the required upgrades and if these are within or in potential influencing distance of on the SSSI and its notified features. The Proposed Development has sought to utilise existing access infrastructure where possible in order to minimise environmental disturbance. Subject to the findings of the ongoing assessment and the implementation of any required mitigation measures, the access track improvements are anticipated to avoid unacceptable effects on the SSSI and accord with the objectives of Policy SP15. |
| <b>EN6: Important Biodiversity and Geodiversity Sites</b> | Policy EN6 seeks to protect important local and regional biodiversity and geodiversity sites by requiring development to conserve and enhance their natural heritage value. Proposals will only be                                                                                                                       | Policy EN6 is relevant to the section of the proposed access track located within Neath Port Talbot. Detailed ecological surveys, assessment and design of the access track remain ongoing. The final design will seek to avoid and minimise effects on any Local Nature Reserves, Sites of Importance for Nature Conservation (SINCs), Regionally Important Geological Sites (RIGS) and other biodiversity interests where practicable. The                                                                                                                                                                                                                                                                                                                                                              |

permitted where impacts are acceptable or where there are no reasonable alternatives and the benefits outweigh the harm, with appropriate mitigation or compensation secured where necessary.

findings of the ongoing surveys and assessment will be reported in the Final ES, together with any mitigation or compensation measures required.

#### **EN7: Important Natural Features**

Policy EN7 seeks to protect important natural features, such as trees, hedgerows and watercourses, by requiring development to retain and integrate these features within design wherever possible. Where loss is unavoidable, appropriate mitigation measures must be provided to address impacts.

Detailed surveys, assessment and design of the access track remain ongoing and will be reported in the final ES. The design process will take account of important natural features, including woodland, trees, hedgerows and watercourses, with mitigation identified where required. Subject to the outcome of those assessments, the access track improvements are anticipated to comply with Policy EN7.

#### **EN8: Pollution and Land Stability**

Policy EN8 requires development proposals to demonstrate that there would not be an unacceptable adverse effect on health, biodiversity and/or local amenity or expose people to unacceptable risk.

Detailed assessment and design of the access track remain ongoing and will be reported in the final ES. Potential effects relating to noise, water pollution, land stability and contamination will be assessed, with mitigation identified where required. Subject to the findings of those assessments, the access track improvements are anticipated to comply with Policy EN8.

#### **SP16: Environment Protection**

Policy SP16 seeks to protect and improve environmental quality by ensuring development does not cause significant adverse effects on air, water or land, prioritises brownfield land where appropriate, and avoids increasing exposure to pollution for existing or future occupants.

The access track would predominantly utilise existing infrastructure, limiting the need for new disturbance. Detailed assessment and design work remain ongoing and will be reported in the final ES. Subject to the implementation of appropriate mitigation measures and the findings of the final assessment, the access track improvements are anticipated to avoid significant adverse effects on water, ground and environmental quality and comply with Policy SP16.

#### **SP17: Minerals**

Policy SP17 seeks to ensure a sustainable supply of minerals by safeguarding resources, maintaining adequate reserves, and promoting efficient use of materials.

The existing forestry access track to A4061 Rhigos Road is partially within a safeguarding area for sandstone and coal within the NPTCBC area. The Proposed Development does not comprise mineral development and would principally involve upgrades to existing access infrastructure. At this stage, surveys, assessment and design work relating to the existing forestry access track remain ongoing. The final ES will identify the

required upgrades and assess any associated environmental effects. Subject to the findings of those assessments, the limited extent of the access track works is not anticipated to sterilise significant mineral resources, prejudice existing mineral operations, or give rise to unacceptable environmental or amenity effects. The Proposed Development is therefore anticipated to accord with the objectives of Policy SP17.

|                                                      |                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>M1: Development in Mineral Safeguarding Areas</b> | Policy M1 seeks to safeguard mineral resources by controlling development within mineral safeguarding areas. Proposals will only be permitted where the resource is of no value, can be extracted prior to development, would not be prejudiced, or there is an overriding need, including ensuring temporary uses do not sterilise future mineral extraction. | The existing forestry access track to A4061 Rhigos Road is partially within a safeguarding area for sandstone and coal within the NPTCBC area. The access track would utilise and upgrade existing infrastructure and is not anticipated to sterilise a significant mineral resource due to the limited scale and extent of the works. Furthermore, the access track is required to facilitate a renewable energy development that supports the delivery of Future Wales objectives relating to decarbonisation, renewable energy generation and climate change mitigation. The Proposed Development is therefore considered to comply with Policy M1. |
| <b>M3: Development in Mineral Buffer Zones</b>       | Policy M3 seeks to protect mineral operations by restricting development within mineral buffer zones unless it can be demonstrated that mineral resources will not be sterilised and that the proposed development would not be adversely affected by ongoing mineral activities.                                                                              | The forestry access track has the potential to interact with a Mineral Buffer Zone. However, the access track is existing access infrastructure and is not anticipated to sterilise mineral resources or be adversely affected by mineral operations. Detailed assessment and design of the forestry access track remain ongoing and will be reported in the final ES. Subject to the outcome of those assessments, the access track improvements are anticipated to comply with Policy M3.                                                                                                                                                            |
| <b>TR2: Design and Access of New Development</b>     | Policy TR2 requires development to ensure safe and efficient access, avoid adverse impacts on the highway network, and be accessible by a range of sustainable transport modes.                                                                                                                                                                                | The Proposed Development will utilise and upgrade existing the existing forestry access track. Detailed assessment of the forestry access track remains ongoing and will be reported in the final ES. Subject to the outcome of those assessments, the Proposed Development is anticipated to provide safe and suitable access and avoid unacceptable impacts on the highway network, in accordance with Policy TR2.                                                                                                                                                                                                                                   |
| <b>SP21: Built Environment and Historic Heritage</b> | Policy SP21 seeks to conserve and enhance the built environment and historic heritage by promoting high-quality design, protecting key                                                                                                                                                                                                                         | The existing forestry access track crosses the western boundary of the Rhondda Registered Historic Landscape (HLW (MGI) 5) and passes through the boundary of the Clawdd Mawr, Mynydd Caerau Scheduled Monument (GM231). Detailed assessment and design of any required access track improvements                                                                                                                                                                                                                                                                                                                                                      |

landscapes and gateways, and safeguarding designated heritage assets, including Conservation Areas, Listed Buildings, Scheduled Monuments and historic landscapes.

remain ongoing. While the access track is expected to make use of existing infrastructure where practicable, the archaeological and heritage implications of any upgrade works will be assessed in the Final ES once the extent of works has been defined. Appropriate mitigation measures will be identified where necessary to avoid, minimise or manage effects on designated and non-designated heritage assets.

## Emerging Policy

- 4.9.28 As noted in **Section 4.7**, RCTCBC and NPTCBC are preparing replacement LDP's, which will guide development within their respective administrative areas over the coming plan periods. While these plans have not yet been adopted and therefore carry limited weight in decision-making, they provide an indication of the future policy direction for development, including in relation to climate change, renewable energy, biodiversity, environmental protection and the historic environment. The Proposed Development is located predominantly within Bridgend County Borough; however, proposed improvements to the existing forestry access track extend into areas covered by the emerging RCTCBC and NPTCBC plans.
- 4.9.29 As the access track improvements are required to facilitate the delivery of the Proposed Development, consideration has been given to the emerging policy frameworks. Detailed design and assessment of the access track remain ongoing and will be reported in the Final ES. Nevertheless, the access track improvements are intended to facilitate the delivery of a renewable energy development that aligns with the broad objectives of the emerging plans. The relevant emerging policies are considered below.

### RCTCBC

- 4.9.30 RCTCBC are preparing a Revised Local Development Plan for the period 2022-2037. The works proposed in RCTCBC comprise improvements to an existing access track required to facilitate the delivery of the Proposed Development. The access track improvements would support the objectives of the emerging policies set out below.
- Draft Strategic Policy SP1: Climate Change and Carbon - The access track improvements would facilitate the delivery of a renewable energy development that supports climate change objectives. Detailed assessment will be presented in the final ES and, subject to its findings, compliance with Policy SP1 is anticipated
  - Draft Strategic Policy SP2: Placemaking and Sustainable Communities – Design and assessment work for the access track remains ongoing and will be reported in the final ES. Subject to the findings of that assessment and implementation of any required mitigation, the access track is anticipated to accord with the objectives of Policy SP2.
  - Draft Strategic Policy SP4: Biodiversity and the Natural Environment – Ecological assessment of the access track is ongoing and will be reported in the final ES. Subject to the findings of that assessment and implementation of any required mitigation and enhancement measures, compliance with Policy SP4 is anticipated.
- 4.9.31 Although the Revised LDP remains at an early stage of preparation, the emerging strategy supports renewable energy development in principle. The Proposed Development would therefore be consistent with the direction of the emerging policy framework. However, only limited weight can be afforded to the emerging policies at this stage.

## NPTCBC

- 4.9.32 NPTCBC are preparing a Replacement Local Development Plan for the period 2023-2038. The works proposed in NPTCBC comprise improvements to an existing access track required to facilitate the delivery of the Proposed Development. The access track improvements would support the objectives of the emerging policies set out below.
- Draft Strategic Policy SP3: Nature Emergency, Biodiversity and the Natural Environment – Ecological assessment of the access track is ongoing and will be reported in the final ES. Subject to the findings of that assessment and implementation of any required mitigation and enhancement measures, compliance with draft Policy SP3 is anticipated.
  - Draft Strategic Policy SP12: Renewable and Low Carbon Energy Generation – Improvements to the existing access track would facilitate the delivery of a renewable energy development which supports national renewable energy and decarbonisation objectives.
  - Draft Strategic Policy SP13: Minerals – Assessment of the access track remains ongoing and will be reported in the final ES. Subject to the findings of that assessment, the access track is anticipated to accord with the objectives of draft Policy SP13.
  - Draft Strategic Policy SP15: Historic Environment – Assessment of the effects of the access track improvements on the historic environment remains ongoing and will be reported in the final ES. Subject to the findings of that assessment and any required mitigation, compliance with draft Policy SP15 is anticipated.
  - Draft Strategic Policy SP18: Environmental Protection – Environmental effects associated with the access track improvements are being assessed and will be reported in the final ES. Subject to the findings of that assessment and implementation of any required mitigation measures, the access track improvements are anticipated to accord with the objectives of draft Policy SP18.
- 4.9.33 Although the RLDP remains at an early stage of preparation, the emerging strategy supports renewable energy development in principle. The Proposed Development would therefore be consistent with the direction of the emerging policy framework. However, only limited weight can be afforded to the emerging policies at this stage.

## Green Infrastructure Statement

- 4.9.34 As noted in **Section 4.3** revised Planning Policy Wales (Edition 12) was published in February 2024. Amongst the changes is the identification of the need for all planning applications to be supported by a Green Infrastructure Statement proportionate to the development proposed. As such, a Green Infrastructure Statement has been prepared to support this application, which considers the requirements set out in PPW12 and should be read in conjunction with this Planning Statement. The Green Infrastructure Statement describes how green infrastructure has been incorporated into the design of the Proposed Development and how the step-wise approach has been used to ensure that loss of habitat is avoided and minimised, and impacts on protected and priority species are appropriately mitigated, where necessary. An assessment is also included within the statement which utilises The Building with Nature standards. As set out within PPW12, these standards represent good practice.

## 5. Conclusion

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### 5.1 The Planning Balance

- 5.1.1 Future Wales is clear that decision makers must give significant weight to the need to meet Wales' international commitments and to support the generation of 100% of Wales' electricity needs from renewable sources by 2035. The Proposed Development would see the delivery of a combined rated output of up to 33.6MW of renewable energy, dependent on final turbine choice, which would support the electricity needs of around 22,468 homes (at 2024 average domestic consumption levels)<sup>91</sup>.
- 5.1.2 Additionally, the Proposed Development would support investment in the economy and employment with approximately 57 FTE (full time equivalent) jobs during construction and 4 FTE during operation. It is estimated that the expenditure in Wales associated with the construction phase would total £13.3m whilst the operation phase would equate to £1.3m per annum. The Proposed Development would also be locally owned and would deliver biodiversity net benefit.
- 5.1.3 The benefits of contributing to energy targets, the economy and the environment have to be balanced against the adverse impacts. Whether such impacts are unacceptable also has to be weighed against the overriding imperative required by Policy 17 to meet Wales' international commitments and to generate renewable energy that meets the Welsh Government's targets.
- 5.1.4 With regards to landscape and visual impacts, the acceptance of some degree of landscape change is outlined in Future Wales Policy 17 and the identification of the PAA for Wind Energy. Policy 17 recognises that the Welsh Government "*has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way*". The modelling also assumed wind turbines up to 250m in height which is some 70m higher than those proposed by the Applicant.
- 5.1.5 Six of the proposed eight wind turbines are located within PAA9 with the remaining two immediately adjacent. Therefore, when deciding upon the acceptability of the Proposed Development in terms of its landscape effects, policy directs the decision maker to consider the effects arising from the two turbines only, and then in the context of a positive policy presumption.
- 5.1.6 The LVIA has undertaken an assessment of the Proposed Development as a whole (it has not focussed its assessment upon the two turbines located outside the PAA). The assessment identifies some significant landscape and visual effects, including significant effects on landscape receptors and localised significant visual effects for certain settlements, recreational receptors and transport routes. However, no significant effects are identified on nationally designated landscapes, including BBNP, the Gower National Landscape and the Glamorgan Heritage Coast. Whilst significant cumulative landscape effects are identified for some receptors these are generally localised, in some cases as result of other wind farm proposals, and represent an anticipated consequence of a wind energy development of this scale and in this location within and immediately adjacent to a PAA.

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<sup>91</sup> DESNZ (2025). Regional and local authority electricity consumption statistics. Available at: <https://www.gov.uk/government/statistics/regional-and-local-authority-electricity-consumption-statistics> (Accessed July 2026).

- 5.1.7 The LVIA also identifies significant visual effects for a number of residential and recreational receptors. A Residential Visual Amenity Assessment (RVAA) will be undertaken as part of the Final ES to assess effects on properties within 2 km of the proposed turbines. Notwithstanding these effects, the LVIA concludes that the Proposed Development would not give rise to unacceptable effects on residential amenity.
- 5.1.8 With regards to the historic environment, no significant effects on heritage assets have been identified in the draft ES for the Proposed Development.
- 5.1.9 With regards to biodiversity, the draft ES assesses that there would be no adverse effects on the integrity of any internationally designated sites and that effects on designated sites and protected species would be negligible and not significant following the implementation of mitigation measures (and subject to further study concerning the requirement or otherwise for works to upgrade the existing forestry access track and the potential for effects upon an SSSI). The Proposed Development would not affect the integrity or conservation status of SINCs within or adjacent to the Wind Farm Site. A range of embedded mitigation measures, including pre-construction surveys and species protection measures, will safeguard ecological receptors during construction. An Outline Habitat Management Plan (HMP) will accompany the application to secure biodiversity protection, mitigation, monitoring and habitat enhancement measures throughout the operational phase. In addition, the Green Infrastructure Statement sets out the approach to delivering a net benefit for biodiversity in accordance with PPW12, with a Net Benefit for Biodiversity (NBB) Statement to be provided with the application. Whilst biodiversity surveys and assessments are substantially complete, some ongoing survey work and mitigation design remain in progress, and the outcomes will be reported in the Final ES.
- 5.1.10 Overall, subject to the completion of the remaining survey work and mitigation design to be reported in the Final ES, the Proposed Development is considered to accord with Policy 17 and Policy 18 of Future Wales. The benefits of the Proposed Development and the impacts have been outlined in this draft Planning Statement and environmental impacts assessed in the accompanying draft ES. It is considered that the planning balance weighs heavily in favour of the Proposed Development.

