

# LLANWONNO ENERGY PROJECT

## Planning Statement

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## PLANNING STATEMENT

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## Contents

<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
	The Applicant.....	1
	Background to the Application.....	1
<b>2</b>	<b>THE PROPOSED DEVELOPMENT .....</b>	<b>2</b>
	Site Location.....	2
	Site Description .....	2
	Proposed Development.....	2
	Wind Turbines .....	3
	Access tracks and turning heads .....	3
	Construction Material .....	4
	Temporary construction compounds and holding areas.....	4
	Crane pads.....	4
	GRP Substation and Control Building .....	4
	Solar panels and mounting structures .....	4
	Inverters and Transformers.....	4
	Cabling.. .....	5
	BESS.....	5
<b>3</b>	<b>PLANNING POLICY CONTEXT .....</b>	<b>6</b>
	UK Policy .....	6
	Climate Change Act 2008 .....	6
	National (Wales) Policy .....	6
	The Wellbeing Future Generations (Wales) Act 2015 .....	6
	Environment (Wales) Act 2016 (as amended) .....	6
	Future Wales – the National Plan 2040 (February 2021) .....	7
	Planning Policy Wales, Edition 12 February 2024 .....	9
	Prosperity for All: A Low Carbon Wales (2019) .....	11
	Net Zero Wales – Carbon Budget 2 (2021) .....	11
	Energy Generation in Wales (2022).....	12
	Renewable Energy in Wales (2022) .....	12
	Energy Policy in Wales .....	13
	Welsh Government Technical Advice Notes.....	13
	Local Planning Policy .....	15
	Development Plan .....	15
	Replacement Local Development Plan .....	17
	Other Material Considerations .....	17
<b>4</b>	<b>PLANNING POLICY ASSESSMENT .....</b>	<b>18</b>
	The Principle of the Proposed Development.....	18
	The Location of the Proposed Development .....	19
	Key Benefits of the Proposed Development .....	19
	Environmental Impact of the Proposed Development.....	19
	Landscape and Visual.....	19
	Highways and Traffic.....	20
	Historic Environment .....	21
	Ecology and Ornithology .....	22
	Hydrology and Flood Risk .....	23
	Noise and Vibration.....	23
	Planning Policy Assessment Conclusions .....	23
<b>5</b>	<b>PLANNING BALANCE AND CONCLUSIONS .....</b>	<b>25</b>

# 1 INTRODUCTION

- 1.1 RPS is instructed by Cenin Renewables Limited (“Cenin”) to submit a planning application for the construction and operation of up to eight wind turbines and solar PV panels with battery storage facility (BESS) and associated infrastructure/hardstanding on land to the northeast of Porth in Rhondda Cynon Taf. The Site is located within the Rhondda Cynon Taf County Borough Council (RCTCBC) administrative area. The project is known as ‘Llanwonno Energy’.

## The Applicant

- 1.2 Cenin (the Applicant) is a Bridgend based renewable energy company committed to powering a greener future. In 2021 Cenin was recognised for its work by the Queen’s Award for Enterprise – Sustainable Development.
- 1.3 The founding principles of Cenin are based on energy generation using natural resources, recycling of materials and sustainable and secure job creation. Planning Policy Wales (PPW) 12 paragraph 5.9.25 states *‘the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into and given weight in the decision-making process’*.
- 1.4 The principles that underpin Cenin have led to the development of its innovative renewable energy centre at Cenin’s headquarters at Parc Stormy in Bridgend County Borough Council (BCBC). Through their innovative approach to renewable energy provision, Cenin unlocks hidden green energy potential and utilises the earth’s natural resources.

## Background to the Application

- 1.5 The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South East Wales economy. Local ownership and distribution is important for ensuring communities in proximity to renewable energy development benefit from it and that the future energy system better serves Wales.
- 1.6 National Grid anticipates annual electricity demand in the UK could increase from 330 TWh in 2020 to up to 627 TWh in 2050, an increase of 90%. Similarly, peak demand in 2019 of 59 GW could increase to up to 96 GW, an increase of 63% over the same period. There is therefore an urgent need to increase electricity capacity in the UK to ensure a secure and stable supply in the future and achieve renewable energy and net zero targets.
- 1.7 Wales has set a target that by 2030 renewables are to generate electricity equal to 70% of its consumption. Currently, it is estimated up to 51% of electricity consumption in Wales is from renewables. It has set a further target for Wales to achieve a 95% reduction in greenhouse gas emissions by 2050 with an ambition to go beyond the target and achieve ‘net zero’.
- 1.8 In 2019 also saw the Welsh and UK Governments declare ‘climate emergencies’, recognising the potentially catastrophic consequences of global warming on ecosystems and human populations. Consequently, there is an urgent need to install new zero-carbon electricity generating stations in Wales and beyond. RCTCBC is playing its part to tackle Climate Change and reinforced its commitment and targets in its new Corporate Plan for 2024-30 - ‘Working with our Communities’. ‘Working with our Communities’ subsumes the work set out in our Tackling Climate Change strategy - ‘Think Climate RCT’.

## 2 THE PROPOSED DEVELOPMENT

### Site Location

- 2.1 The Site comprises land to the northeast of Porth and south of Llanwonno, which lies approximately 5km from Pontypridd.
- 2.2 The Site is located approximately 270m east of the consented Llwynneclyn Wind Project which comprises two turbines (application reference: 15/1635/FUL, approved in 2017). Installation of the Llwynneclyn Wind Project has commenced with construction to be completed by mid-2025.
- 2.3 The location and geographic extent of the Site is provided in the attached Site Location Plan.

### Site Description

- 2.4 The Site is approximately 112.4 hectares (ha) and consists of several parcels of land. The Site is currently used for semi-improved pasture in an extensive pattern of irregularly shaped large fields.

### Proposed Development

- 2.5 The Proposed Development comprises the construction and operation of up to eight wind turbines and solar PV panels with battery storage facility and associated infrastructure/hardstanding. The Proposed Development comprises the following key components, which have been further described in this chapter of the ES:
- 2.6 Wind Farm:
- Wind turbines
  - Access tracks and turning heads
  - Construction Material
  - Temporary construction compounds and holding areas
  - Crane pads
  - GRP Substation and Control Building
- 2.7 Solar array:
- Solar panels and mounting structures
  - Inverters
  - Transformers
  - Cabling
- 2.8 The main components of a BESS facility are:
- Battery storage units
  - Battery interface cabinets
- 2.9 The location and geographic extent of the key components of the Proposed Development is provided in the Site Layout Plan.
- 2.10 Where practicable, the design and layout of the Proposed Development, including the key components set out above has been amended in response to identified design and/or environmental constraints. The design and layout of the Proposed Development may be further amended in response to feedback received as part of the Pre-Application Consultation (PAC)

stage of the DNS application process. Justification for the location of the Proposed Development, including the design and environmental constraints considered as part of the iterative design process is provided in Volume 1, Chapter 3: Design evolution and alternatives

## Wind Turbines

- 2.11 The Proposed Development comprises the construction, operation and decommissioning of eight wind turbines, the proposed model of turbine is Vensys V126. The turbine layout is outlined in Volume 2, Figure 2.1: Site Layout Plan of the ES and Turbine specifications are detailed in Volume 2, Figure 2.2: Typical Turbine Elevations and Volume 2, Figure 2.3: Turbine Foundation Details.
- 2.12 The turbines will have a varying base to blade tip height of 150m-200m. An outline of the individual turbine sizes and their grid ref locations is as follows:

**Table 2.1: Individual Turbine Specifications and Grid References**

Name	Hub Height (m)	Rotor Diameter (m)	Tip Height (m)	Easting	Northing
T1	86.9	126	150m	304040	192899
T2	86.9	126	150m	304351	192699
T3	86.9	126	150m	304938	192145
T4	96.9	126	160m	304259	193208
T5	96.9	126	160m	304507	192945
T6	96.9	126	160m	304751	192555
T7	117	126	180m	304875	192841
T8	136.9	126	200m	305102	192578

- 2.13 However, it should be noted that the final location of each of the eight wind turbines and associated infrastructure may be subject to further micro-siting following submission of the DNS application in response to detailed design and/or environmental constraints. The maximum allowance for micro-siting the wind turbines, based on best practice for other similar DNS applications, would be up to 50m.

## Access tracks and turning heads

- 2.14 The Proposed Development comprises the construction, operation and maintenance and decommissioning of on-site surfaced tracks providing access to the wind turbines, onsite substation compound and temporary construction compounds from the local highway network.
- 2.15 The material used for the access tracks will be graded stone of 5 m widths and a total track footprint/excavated area of 1.41ha.
- 2.16 Most of the on-site access tracks would be required to facilitate the construction of the Proposed Development.
- 2.17 Additionally, a number of access tracks will be retained after construction in order to facilitate maintenance activities during the operational phase.
- 2.18 Details of the proposed access tracks are shown within Volume 2, Figure 2.4: Typical Track and Trench Detail.

### Construction Material

- 2.19 Borrow pits are not included within the Proposed Development. Stone for roads will be taken from turbine foundation excavations.

### Temporary construction compounds and holding areas

- 2.20 The compound would be used, where necessary, for temporary storage of the various components and materials which are required for construction.
- 2.21 The material used for the construction compound will be graded stone with a width of 95 m to 115 m. The length will be 120 m to 140 m (non-rectangular) and a footprint area/excavated area of 1.37 ha. The excavation depth will be 0.2 m to 5 m subject to existing slope to create flat area.
- 2.22 The temporary construction compounds will be reinstated at the end of the construction phase. The stored subsoil and the stored topsoil would be laid over the underlying stone surface and then reseeded using a seed mix selected or, where possible, turfs would be reinstated.
- 2.23 Details of the Construction Compound are shown in Volume 2, Figure 2.5: Construction Compound Details.

### Crane pads

- 2.24 Permanent crane hardstandings (pads) as well as temporary lay down areas will be constructed to facilitate the cranes required for the erection of turbine components. To provide stable, firm ground for safe operation of the cranes, areas of hardstanding would be laid down on one side of each turbine foundation.

### GRP Substation and Control Building

- 2.25 The proposal includes a GRP Substation and Control Building. Their layout and specification are shown within Volume 2, Figure 2.6: BESS and Substation Layout Details and Volume 2, Figure 2.7: Electrical Infrastructure Cabinet Details, respectively. The GRP Substation includes substation switches to be chosen on the advice of an electrical engineer.

### Solar panels and mounting structures

- 2.26 The Solar PV panels are fixed panels which will be positioned at a south facing 'fixed' tilt. There are no moving elements associated with the panels. They will be arranged in a series of rows known as arrays.
- 2.27 The panels are 2.8 m at their highest point, including posts which elevate the panel 1 m off the ground. The panel itself is 6.7 m long and tilted southwards at an angle of 15 degrees. See Volume 2. Figure 2.8: Solar PV Panels Elevations.
- 2.28 The metal support frames or mounting structures for the panels will be installed by piled technique and there would be no significant ground works required with this installation method.

### Inverters and Transformers

- 2.29 'String' inverters will be mounted onto the support frames and will not require any additional foundations. The transformers will be housed in Glass Reinforced Plastic (GRP) containers and will be in a suitable pantone colour that can be agreed with RCTCBC.

### **Cabling**

- 2.30 The proposals include 33kV cabling which will connect the scheme components to the onsite GRP substation. Details of the 33kV trench required are shown in Volume 2, Figure 2.4: Typical Track and Trench Details.

### **BESS**

- 2.31 The proposal will also include a 30 MW / 4 hours BESS (24 no. 40 ft containers), which will store any surplus electricity generated by the solar panels and wind turbines and release it when needed. The proposed layout of the BESS facility can be seen in Volume 2, Figure 2.10: BESS and Substation Layout Details.



### 3 PLANNING POLICY CONTEXT

#### UK Policy

##### Climate Change Act 2008

- 3.1 The Climate Change Act 2008 received Royal Assent on the 26<sup>th</sup> November 2008 and introduced legally binding targets on the Secretary of State (SoS) to reduce the UK's net greenhouse gas emissions by at least 80% from 1990 by 2050. In 2019, it was updated through The Climate Change Act 2008 (2050 Target Amendment) Order 2019 to increase this target to 100%. The Climate Change Act 2008 also established a series of measures to achieve these targets, including the introduction of carbon budgeting, a carbon trading scheme, and the creation of a new Committee on Climate Change (CCC).
- 3.2 This section of the statement identifies the national and local planning policy and guidance relevant to the Proposed Development and Site. These include:
- Future Wales - the National Plan 2040, published February 2021 ('Future Wales'),
  - Planning Policy Wales, Edition 12 published February 2024 ('PPW'),
  - Welsh Government Technical Advice Notes (TANs),
  - RCTCBC Local Development Plan, adopted March 2011 (the 'LDP'), and
  - Other Material Considerations
- 3.3 A summary of relevant planning policies and guidance is provided below.

#### National (Wales) Policy

##### The Wellbeing Future Generations (Wales) Act 2015

- 3.5 The Wellbeing of Future Generations (Wales) Act 2015 creates a legal obligation on public bodies to improve, amongst other things, the environmental well-being of Wales. It also compels public bodies to set objectives that contribute to achieving seven well-being goals, including:
- A prosperous Wales, described as '*An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work;*
  - A resilient Wales, described as '*A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)*' and
  - A globally responsible Wales, described as '*A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.*'

##### Environment (Wales) Act 2016 (as amended)

- 3.6 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. 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 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.

### Future Wales – the National Plan 2040 (February 2021)

- 3.7 Future Wales is the national development framework, setting the direction for development in Wales to 2040. It addresses key national priorities, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.
- 3.8 Regarding climate change, Future Wales recognises that changes to our climate and weather patterns will have a significant impact on well-being on both current and future generations. Increasing temperatures and extreme weather events are putting pressure on ecosystems, infrastructure, the built environment and our unique landscape and cultural heritage, which all contribute to social, economic and ecological resilience.
- 3.9 Climate change is identified as an equality issue as it will disproportionately affect the most vulnerable communities in Wales and the wider world. This is despite the most vulnerable communities historically contributing least to the problem of climate changing emissions. Vulnerable communities are more likely to be exposed to the risks and impacts of climate change without the ability to cope with, or recover from, those impacts.
- 3.10 It is noted that it is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with PPW 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.
- 3.11 Regarding energy generation, Future Wales identifies that Wales can become a world leader in renewable energy technologies. Wales' wind and tidal resources, potential for solar generation, its support for both large and community scaled projects and commitment to ensuring the planning system provides a strong lead for renewable energy development means it is well placed to support the renewable sector, attract new investment, and reduce carbon emissions.
- 3.12 Future Wales contains two policies (17 and 18) of specific relevance to this project.
- 3.13 **Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure** – expresses strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. The policy states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 100% of consumed electricity by renewable means by 2035 in order to combat the climate emergency.
- 3.14 In respect of large-scale solar, Policy 17 states that all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. It also expects proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.
- 3.15 Future Wales includes ten Pre-Assessed Areas (PAA) for Wind Energy. Welsh Government has modelled the likely impact of development in these areas and found that, in principle, they are capable of accommodating such development in an acceptable way. The Llanwonno Energy Project is not situated within a PAA for wind energy. Therefore, Policy 18 is applicable.

- 3.16 **Policy 18 – Renewable and Low Carbon Energy Developments of National Significance** – deals with Developments of National Significance ('DNS'). It is a criteria-based policy which states that such developments will be permitted (subject to policy 17) and the following:
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);
  2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;
  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);
  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;
  5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;
  6. there are no unacceptable adverse impacts on statutorily protected built heritage assets;
  7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;
  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);
  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;
  10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;
  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.
- 3.17 Policy 18 also requires that the cumulative impacts of existing and consented renewable energy schemes should also be considered.
- 3.18 In addition to topic-based policies, Future Wales establishes 4 regions and policies appropriate to them. RCT is within the 'South East' region in which it is noted that decarbonisation and responding to the threats of the climate emergency should be central to all regional planning.
- 3.19 There is strong potential for wind, marine and solar energy generation and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South East economy. Local ownership and distribution are important for ensuring communities in proximity to renewable energy development benefit from it and that the future energy system better serves Wales.

## Planning Policy Wales, Edition 12 February 2024

- 3.20 Edition 12 of PPW was released in February 2024. It remains centred around the well-being goals set out in the Well-being of Future Generations Act 2015 ('WBFG'). These are:
1. A prosperous Wales
  2. A resilient Wales
  3. A healthier Wales
  4. A more equal Wales
  5. A Wales of cohesive communities
  6. A Wales of vibrant culture and thriving Welsh language
  7. A globally responsible Wales
- 3.21 PPW sets out five 'Key Planning Principles' (page 17), the fifth of which concerns 'Maximising environmental protection and limiting environmental impact', which states:
- "Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest. This means acting in the long term to respect environmental limits and operating in an integrated way so that resources and/ or assets are not irreversibly damaged or depleted. The polluter pays principle applies where pollution cannot be prevented and applying the precautionary principle ensures cost effective measures to prevent environmental damage."* (*our emphasis*)
- 3.22 Paragraph 5.2.20 recognises that the construction of large or prominent structures such as wind turbines can interfere with telecommunications and broadcast services due to the physical obstruction or reflection of signals and states that interference should be taken into consideration in the siting and design of developments.
- 3.23 Section 5.7– Energy – outlines the context to, and the requirements of, energy projects. Paragraph 5.7.1 states low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power.
- 3.24 Paragraph 5.7.2 acknowledges that overall power demand is expected to increase as a result of growing electrification of transport and heat. PPW highlights that in order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement.
- 3.25 Paragraph 5.7.6 stresses 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.
- 3.26 Paragraph 5.7.7 states:
- "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."* (*our emphasis*)
- 3.27 In terms of delivery, Paragraph 5.7.7 goes on to state that the planning system should (inter alia):
- integrate development with the provision of additional electricity grid network infrastructure;
  - optimise energy storage,
  - optimise the location of new developments to allow for efficient use of resources, and

- maximise renewable and low carbon energy generation.
- 3.28 Paragraph 5.7.8 states an effective electricity grid network is required to fulfil the Welsh Government's renewable and low carbon ambitions. It advocates an integrated approach towards planning for energy developments and additional electricity grid network infrastructure. In certain circumstances, additional electricity grid network infrastructure will be needed to support the Pre-Assessed Areas in Future Wales, but also new energy generating developments more generally.
- 3.29 PPW paragraph 5.7.14 confirms that the Welsh Government targets for the generation of renewable energy are:
- Wales to generate 70% of its electricity from renewable energy by 2030,
  - one Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030, and
  - new renewable energy projects to have at least an element of local ownership.
- 3.30 Section 5.9.19 sets out the key issues in determining applications for renewable and low carbon energy technologies. It states planning authorities should consider:
- the contribution a proposal will make to meeting identified Welsh, UK and European targets;
  - the contribution to cutting greenhouse gas emissions; and
  - the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development.
- 3.31 PPW paragraph 5.9.20 states planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account:
- the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations;
  - the impact on the natural and historic environment;
  - cumulative impact;
  - the capacity of, and effects on the transportation network;
  - grid connection issues where renewable (electricity) energy developments are proposed; and
  - the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so, consider whether measures to adapt to climate change impacts give rise to additional impacts.
- 3.32 Prior to an application being submitted, developers for renewable and low carbon energy developments are encouraged, wherever possible, to consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures.
- 3.33 Paragraph 5.9.22 states developers should take an active role in engaging with the local community on renewable energy proposals. This should include pre-application discussion and provision of background information on the renewable energy technology that is proposed.
- 3.34 Paragraph 5.9.24 states the Welsh Government supports renewable and low carbon energy projects that provide proportionate benefit to the host community or Wales as a whole.
- 3.35 Paragraph 5.9.25 states the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into and given weight in the decision-making process.



- 3.36 Paragraph 5.9.26 states that there are significant opportunities to achieve local benefits through renewable energy developments. Some benefits can be justified as mitigation of development impacts through the planning process. In addition, developers may offer benefits not directly related to the planning process. Local authorities, where practical, should facilitate and encourage such proposals.
- 3.37 Chapter 6 – Distinctive and Natural Places - has been significantly updated in PPW12 with key policy changes relating to Green Infrastructure, Net Benefit for Biodiversity, the Step-wise Approach, protection for Sites of Special Scientific Interest and Trees and Woodlands.
- 3.38 Section 6.2 - Green Infrastructure – outlines the context to and the requirements in relation Green Infrastructure for applications. Paragraph 6.2.12 states that a green infrastructure statement must be submitted with all applications. It should be proportionate to the scale and nature of the proposed developed.
- 3.39 Paragraph 6.4.5 states that development should not cause any significant loss of habitats or populations of species (not including non-native invasive species) and provide a net benefit for biodiversity an improve, or enable the improvement, of the resilience of ecosystems. LPA's are advised to take particular account of 'DECCA' attributes of ecosystems which relate to diversity, extent, condition, connections and adaptability.
- 3.40 Paragraphs 6.4.11 outlines the step-wise approach that must be followed as a means of maintaining and enhancing biodiversity. The step-wise approach dictates that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

### **Prosperity for All: A Low Carbon Wales (2019)**

- 3.41 Prosperity for All: A Low Carbon Wales (March 2019) set out a high-level plan to transition Wales to becoming a low carbon nation, outlining ways to reduce emissions and support the growth of a low carbon economy. It contained policies to reduce fossil fuel use in power generation and deliver on renewable energy targets, stating that 'The reduction of electricity generation from fossil fuels must be accompanied by increases in low carbon generation'. The Plan also stated that "the bulk of new generating capacity should be provided by the lowest cost technologies", while also re-iterating WG support for onshore wind technology. Additionally, it highlighted WGs ambition for low carbon energy to become the main source of energy in Wales, especially as heat and transport transition to electric power.
- 3.42 In November 2019, WG published Prosperity for All: A Climate Conscious Wales, a climate change adaption plan setting out their approach for adapting to the impacts of climate change between 2020 – 2025. Whilst it does not contain specific policies or actions relating to renewable energy or onshore wind, its publication alongside the Prosperity for All: A Low Carbon Wales plan demonstrates the commitment of WG to the wider issue of tackling climate change and reducing its impacts on the people of Wales.

### **Net Zero Wales – Carbon Budget 2 (2021)**

- 3.43 Published in 2021, Net Zero Wales: Carbon Budget 2 (2021- 25)<sup>23</sup> was the successor to Prosperity for All: A Low Carbon Wales. It directly relates to Wales' second Carbon Budget, but also puts in place longer term policies aimed at helping Wales achieve net zero by 2050. Prominent commitments include an additional 1 GW of renewable capacity to be installed by 2025, and additional electricity supply to come exclusively from decarbonised fossil fuel power plants by 2035 at the latest. It also contains policies relating to increasing low carbon and renewable generation, specifically Policy 22 - Increasing renewable energy developments on land through our planning

regime, which highlights the role of planning documents Future Wales – The National Plan 2040 (Future Wales) and PPW 12, in supporting the consenting and development of large scale (onshore) energy projects. These are discussed more fully in the Planning Framework section. Net Zero Wales contains a raft of policies aimed at decarbonising most transport solutions and moving them to electric power by 2050, and also outlines the WG’s ambition for increased electrification of industrial processes.

### Energy Generation in Wales (2022)

- 3.44 Energy Generation in Wales (2022)<sup>24</sup> is a series of annual updates which provide a picture of energy generation within Wales and is a consistent measure of progress against WG energy targets. The report notes we supply the equivalent of approximately 56% of the annual consumption of energy is from renewables and notes progress on working towards a target of 70% by 2030. The report further notes that the energy consumption from renewables is up 5% from 2019 – being the last year before the disruption by the COVID pandemic.
- 3.45 The report further notes that 86% of 1 GW local ownership target has been achieved and estimates that 33% of total electricity generation in Wales comes from renewable sources. As highlighted in the WG ‘Energy Generation in Wales (2022)’ report, onshore wind deployment in Wales during 2020 was at its lowest point in a decade.
- 3.46 Turbine technology has advanced considerably during this period. Despite the relative lack of deployment activity, it is clear that this position is changing, due to the increased number of new applications in the UK utilising the latest generation of technology. In a Welsh context this is reflected in the increased number of DNS proposals for windfarms and provides evidence for the increased desire realise the development potential of this type of technology and in its contribution to the renewable energy targets of both the Welsh and UK Governments. The technology advancements were recognised by the WG during the preparation of the evidence base for Future Wales in 2019 - the methodology used to define the PAA boundaries included an assessment of wind turbines with up to 250 m blade tip heights as the maximum height scenario expected to be proposed. Nonetheless, proposals at greater dimensions (260 m tip heights) are already being proposed elsewhere in the UK.

### Renewable Energy in Wales (2022)

- 3.47 Against the backdrop of COP 26 in late 2021, the looming energy price crisis and the ever-present climate emergency, the Climate Change, Environment and Infrastructure (CCEI) Committee’s commissioned a report which focused its attention on the steps being taken by the WG and what steps need to be taken to stimulate renewable energy generation in Wales. The report produced Renewable Energy in Wales 2022.
- 3.48 The Chair of the CCEI Committee noted
- “Wales’ geography and topography offer abundant opportunities for renewable energy development, both on land and offshore. If these opportunities are seized, Wales can go beyond meeting domestic energy need to become a world leader in renewable energy production, supplying clean, affordable energy across the UK and beyond. But there are significant, long-standing barriers to development that must be addressed, and urgently, for Wales to unlock its full renewables potential. A lack of grid capacity and a complex and slow consenting regime, amongst other things, are holding back the work of developing a more sustainable energy future. If left unaddressed, there is a real risk Wales will fail to meet its climate change commitments – losing out on the social and economic benefits the renewable energy revolution offers”*

- 3.49 The Renewable Energy in Wales (2022) report published 17 recommendations which are seen as targeted actions to invigorate the identified constraints to achieving the renewable energy targets and net zero carbon energy production.
- 3.50 Issues highlighted which would be addressed by the 17 recommendations are:-
- The Electricity Grid
    - Welsh Government action to develop the grid in Wales
    - Lack of grid capacity is constraining renewable energy development
    - Cost of grid connection
    - The pathway to grid infrastructure investment
    - Ambitions for a Wales Energy System Architect
  - Consenting and licensing
    - Lack of capacity and resources for timely decisions
    - Particular challenges exist for marine energy developments
    - Lack of a robust marine evidence base
    - A new infrastructure consenting regime for Wales
  - Opportunities to scale up community and local energy in Wales
    - Increasing 'shared ownership'
    - Improving access to public land
    - Supportive public procurement practices
    - The role of Ynni Cymru
    - Community benefit arrangements.

### Energy Policy in Wales

- 3.51 The Welsh Government has produced a series of policy statements, progress reports and cabinet statements which confirm the country's aims and ambitions to reduce reliance on fossil fuels, decarbonise energy production and increase the amount of electricity generated from renewable sources. The targets to achieve the aims and ambitions are being incrementally achieved, however recognition that stronger policy direction and WG stimulus is needed to ensure the aims and ambitions are met. The Energy Policy in Wales assessment above shows a timeline of increased policy support for renewables and a desire to stimulate the conditions where the aims and ambitions can be met. In conjunction with a Planning Policy Framework which seeks to encourage new renewable energy development, the WG support for the Proposed Development is obvious.

### Welsh Government Technical Advice Notes

- 3.52 Technical Advice Notes (TAN) provide detailed planning advice on a variety of topics. It is advised that they be read along with PPW which sets out the land use planning policies. The relevant TANs to this application are as follows:
- TAN 5: Nature Conservation and Planning (September 2009);
  - TAN 6: Planning for Sustainable Rural Communities (July 2010).
  - TAN 11: Noise (1997)



- TAN 12: Design (March 2016)
- TAN 15: Development, Flooding and Coastal Erosion (December 2021); and;
- TAN 18: Transport (March 2007).

### **Technical Advice Note (TAN) 5: Nature Conservation and Planning**

- 3.53 This TAN provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation, including protected species and habitats.

### **Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities**

- 3.54 The purpose of this TAN is to provide practical guidance on the role of the planning system in supporting the delivery of sustainable rural communities.

### **Technical Advice Note (TAN) 11: Noise**

- 3.55 TAN 11 provides advice on how the planning process can be used to minimise the adverse impacts associated with noise without placing unreasonable restrictions on development.
- 3.56 A draft of the revised planning guidance 'Technical Advice Note 11: Air Quality, Noise and Soundscape' and 'Supporting Document 1: Soundscape Design' was consulted on in January 2023.

### **Technical Advice Note (TAN) 12: Design**

- 3.57 This TAN provides guidance on how good design should be achieved through the planning process. Paragraph 2.6 states that “*design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities*”.

### **Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion**

- 3.58 TAN15 provides technical guidance which supplements the policies set out in PPW in relation to flooding and coastal erosion. The note provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the consequences of the risks and adapting to and living with flood risk.
- 3.59 A new TAN15 is being drafted and will utilise the Flood Map for Planning (FMfP), which has been prepared to coincide with the publication of the new TAN15. The current zones A, B, C1 and C2 are set to be replaced by zones 1, 2 and 3, with greater emphasis on the various sources of flooding.
- 3.60 The FMfP takes into account allowances for climate change and incorporates flood risk from surface water and small watercourses, as well as rivers and sea. The FMfP is already being heavily used by the decision makers across Wales.
- 3.61 TAN15 has been considered in the Flood Consequences Assessment (FCA)/Drainage Strategy submitted with this planning application.

### **Technical Advice Note (TAN) 18: Transport**

- 3.62 This TAN states that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development, in particular climate change and the outcomes identified by Welsh Government
- 3.63 Paragraph 9.2 requires developers to submit transport assessments to accompany planning applications for developments that are likely to result in significant trip generation. Given the nature

of the Proposed Development it would not result in significant trip generations once completed, with the only potential highway impacts during the temporary construction phase. Therefore, a Construction Traffic Management Plan (CTMP) accompanies the planning application.

### Local Planning Policy

#### Development Plan

- 3.64 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.65 The development plan for the Site is the RCTBC Local Development Plan, adopted March 2011.
- 3.66 The LDP Constraints Map and publicly available geographical information systems (GIS) indicates the site is affected by the following designations or features:
- The following Public Rights of Way (PRoW) are adjacent to the site (no PRoW directly traverses the Site):
    - Footpath YCC/28/3
    - Footpath YCC/36/2
    - Bridleway YCC/14/1
- 3.67 The Site also immediately adjoins or lies in the vicinity of the following designations or features:
- Site of Importance for Nature Conservation (SINC) - Llys Nant and Graig Twyn-y-glog Woodland
- 3.68 With regard to historic designations, the Site is partially located within a Registered Landscape of Historic Interest.
- 3.69 The following Policies are of relevance to the Proposed Development:
- 3.70 **CS1 Development in the North** states that in the Northern Strategy Area, the emphasis for development will be on building strong, sustainable communities by (inter alia) encouraging a strong, diverse economy which supports traditional employment and promotes new forms of employment in the leisure and tourism sectors and protecting the cultural identity of the Strategy Area by protecting historic built heritage and the natural environment.
- 3.71 **CS2 Development in the South** seeks to ensure that within the Southern Strategy Area, the emphasis is on sustainable growth that benefits Rhondda Cynon Taf as a whole by (inter alia) Providing opportunities for significant inward investment, in sustainable locations, that will benefit the economy of Rhondda Cynon Taf and the Capital Region and protecting the cultural identity of the Strategy Area by protecting historic built heritage and the natural environment.
- 3.72 **AW7 Protection and Enhancement of the Built Environment** states that development proposals which impact upon sites of architectural and / or historical merit and sites of archaeological importance will only be permitted where it can be demonstrated that the proposal would preserve or enhance the character and appearance of the site. Also, development proposals which affect areas of public open space, allotments, public rights of way, bridleways and cycle tracks will only be permitted where it can be demonstrated that:
1. There is a surplus of such facilities in the locality, or;
  2. The loss can be replaced with an equivalent or greater provision in the immediate locality; or
  3. The development enhances the existing facility

**3.73 AW8 Protection and Enhancement of the Natural Environment** seeks to protect Rhondda Cynon Taf's distinctive natural heritage from inappropriate development, ensuring it is preserved and enhanced. Development proposals will only be permitted where:

1. They would not cause harm to the features of a Site of Importance for Nature Conservation (SINC) or Regionally Important Geological Site (RIGS) or other locally designated sites, unless it can be demonstrated that:
  - The proposal is directly necessary for the positive management of the site; or
  - The proposal would not unacceptably impact on the features of the site for which it has been designated; or
  - The development could not reasonably be located elsewhere, and the benefits of the proposed development clearly outweigh the nature conservation value of the site.
2. There would be no unacceptable impact upon features of importance to landscape or nature conservation, including ecological networks, the quality of natural resources such as air, water and soil, and the natural drainage of surface water

Development proposals that may affect protected and priority species will be required to demonstrate what measures are proposed for the protection and management of the species and the mitigation and compensation of potential impacts and be accompanied by appropriate ecological surveys and appraisals. Proposals that contribute to the management or development of Ecological Networks will be supported.

**3.74 AW10 Environmental Protection and Public Health** states that development proposals will not be permitted where they would cause or result in a risk of unacceptable harm to health and / or local amenity because of:

- air pollution,
- light pollution,
- noise pollution,
- contamination,
- landfill gas,
- land instability,
- water pollution,
- flooding, or
- any other identified risk to the environment, local amenity and public health or safety,

unless it can be demonstrated that measures can be taken to overcome any significant adverse risk to public health, the environment and / or impact upon local amenity.

**3.75 AW12 Renewable and Non-Renewable Energy** supports development proposals which promote the provision of renewable and non-renewable energy such as schemes for energy from biomass, hydro-electricity, anaerobic digestion, on-shore oil and gas and small / medium sized wind turbines where it can be demonstrated that there is no unacceptable effect upon the interests of soil conservation, agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity. Further, development proposals should be designed to minimise resource use during construction, operation and maintenance.

**3.76 AW13 Large Wind Farm Development** requires proposals for wind farm developments of 25MW and over or capable of accommodating 25MW or over to demonstrate that the proposal:

1. Is within the boundary of the strategic search area;
2. Is sited on a predominantly flat, extensive area of upland;
3. Is located a minimum of 500 metres away from the nearest residential property unless it can be demonstrated that locating turbines closer to residential properties will have no unacceptable impact on human health;
4. Will not because of its siting, scale or design have an unacceptable effect on the visual quality of the wider landscape;
5. Will minimise any loss of, and where possible enhance public accessibility to the countryside.
6. Will not cause unacceptable impact on, and where appropriate will enhance, sites designated for their international, national or local nature conservation value.
7. Will protect the natural beauty and special qualities of the Brecon Beacons National Park.

Where development proposals are acceptable applicants will be required to enter into and implement appropriate land management agreements.

- 3.77 **AW14 Safeguarding of Minerals** outlines the mineral resources that shall be safeguarded from any development which would unnecessarily sterilise them or hinder their extraction. The resources of Sandstone, as shown on the proposals map, will be safeguarded from development.

### Replacement Local Development Plan

- 3.78 Preparation has commenced on the replacement of the current LDP which will set out the planning policy for the borough up to 2037. The Preferred Strategy was made available for public consultation in from February – April 2024. The Preferred Strategy outlines 18 Objectives which set out in detail the wider intentions of the Vision of the RLDP. The Proposed Development would positively contribute to the following objective:

**Objective 1** seeks to “mitigate and adapt to the effects of climate change and reduce flood risk”; in this regard, the LPA will seek to “Increase the production and supply of renewable energy and where possible reduce carbon generating energy consumption.”

- 3.79 In considering this application the most up to date development plan is Future Wales. This has been confirmed in similar circumstances when DNS applications have been assessed.

### Other Material Considerations

- 3.80 National and International legislation has set targets for reducing carbon emissions and increasing renewable energy generation.
- 3.81 Wales has set a target that by 2030, renewables are to generate electricity equal to 70% of its consumption. Currently, it is estimated up to 51% of electricity consumption in Wales is from renewables. The Environment (Wales) Act 2016 requires a reduction in greenhouse gas emissions by 2050 to ‘net zero’.
- 3.82 In June 2022, RCT published its ‘Think Climate’ Strategy which seeks to make Rhondda Cynon Taf carbon neutral by 2030. The strategy outlines intentions to “progress wind, hydro and solar energy schemes to reduce the cost of meeting our energy needs and generate income, whilst reducing our carbon footprint” (pp.7, para 2).
- 3.83 Renewable energy development, like Llanwonno Energy Project, will assist in reaching the renewable energy target (both local and national) by 2030 and legal requirement by 2050.

## 4 PLANNING POLICY ASSESSMENT

- 4.1 This section provides an assessment of the Proposed Development with regard to the various environmental and technical topics that are examined in the ES and supporting technical reports. This section will assess the findings against the relevant planning and renewable energy policies which has been set out in Section 3 of this PS.
- 4.2 The assessment focusses on the provisions of Future Wales as the principal policy for decision making for DNS applications, whilst also referring to other relevant national planning policy and the LDP. The assessment also considers the compliance of the Proposed Development with the Wellbeing of Future Generations (Wales) Act, 2015. The key benefits that would arise from the Proposed Development are also described.
- 4.3 Having regard to the positive planning policy context in respect of renewable energy development set out above, it is clear that a presumption in favour of sustainable development exists in respect of the proposal, particularly under the considerations set out under PPW. However, the planning policy context indicates that any planning application must also address the following key topics:
- Principle of the Proposed Development
  - Location of the Proposed Development;
  - Land, Soils and Peat;
  - Landscape and Visual;
  - Highways and Traffic (in respect of temporary construction works);
  - Historic Environment;
  - Shadow Flicker, Aviation and Telecommunications;
  - Ecology and Ornithology;
  - Geology and Hydrogeology;
  - Hydrology and Flood Risk; and
  - Socioeconomics.
- 4.4 The key matters with reference to specific topics is set out below.

### The Principle of the Proposed Development

- 4.5 The UK and Welsh Government have declared a climate emergency in the last six years. In response, both UK and Welsh Government have legislated a net zero emissions target by 2050.
- 4.6 Planning policy in Wales is also clear in its support for the principle of renewable energy development, primarily through Future Wales and PPW at a national level, and the RCTCBC LDP and associated policy at local level.
- 4.7 The Proposed Development comprises wind turbines and solar photovoltaic array with a combined installed generation capacity of approximately 61 MW, Battery Energy Storage System (BESS), cable route and ancillary development, which will be a significant contribution to the generation of low carbon electricity in Wales, and as such is strongly supported in principle by Future Wales and PPW due to its role in tackling the climate emergency and increasing energy security.

## The Location of the Proposed Development

- 4.8 The Site is outside the Pre-Assessed Areas for Wind, so Cenin have really focused on the benefits of the scheme, wider environmental benefits, and local benefits. Cenin for many years have provided sponsorship opportunities in the local area but wanted to go above and beyond this, as they are passionate about helping the University of South Wales to decarbonise their campus with local green power so they could become a groundbreaking net zero campus.
- 4.9 Cenin are very familiar with the area and Proposed Development Site having worked on a nearby project for the last 10 years. Cenin have two operational wind turbines nearby called Llwynceilyn Wind. As a result, Cenin have had the time to really invest in making sure the design of Llanwonno Energy is appropriate and responds to site constraints and takes into consideration all the opportunities. Further details of the site selection process and development of concept has been discussed in detail in the Design Evolution Plan and associated Design and Access Statement.
- 4.10 All constraints from the Site have been assessed and the design has been created using constraints plans to avoid environmental conflicts. Constraints have included but not limited to environmental designations, utilities and gas lines, telecoms, distances to residences, water courses and roads, woodland and topography.

## Key Benefits of the Proposed Development

- 4.11 The Proposed Development will yield some benefits including:
- Job creation during construction;
  - The long term aim of bringing down energy costs;
  - Generation of green local power;
  - Ability to power local users. The applicant is exploring the opportunity to provide power to The University of South Wales to power them towards a ground breaking net zero campus.
  - Sponsorships in the local community.
  - Ecological enhancements across the site and beyond
  - Looking to power high energy users in the local area who could utilise the local, green power offered by Llanwonno Energy.
  - Increased energy security and resilience
  - Reduce carbon emissions

## Environmental Impact of the Proposed Development

### Landscape and Visual

- 4.12 Chapter 5 Landscape and Visual Impact Assessment (LVIA) of the ES considers the likely effects of the Proposed Development on landscape and visual resources. The LVIA considers the likely effects of the Proposed Development on nearby communities and individual dwellings.
- 4.13 Future Wales Plan Policy 18 states that proposals for renewable energy projects will be permitted subject to there being 'no unacceptable adverse visual impacts on nearby communities and individual dwellings'. The assessment concludes that although there are some significant adverse visual effects on landscape units through the LANDMAP filtering process.
- 4.14 The landscape assessment assessed the effects on the landscape character and landscape designations within the study area. The landscape character assessment followed the NRW guidance Note 46 which recommends that LANDMAP is used as a starting point for creating suitably scaled character-based reporting units and suggests that reporting units may be LANDMAP visual



and sensory aspect areas (VSAAs). The landscape designations assessed were the Special Landscape Areas (SLAs), The Brecon Beacons National Park, Registered Historic Landscape and Country Parks.

- 4.15 Viewpoint photography and fieldwork was carried within the 30 km study including winter and nighttime photographs. The visual baseline examined various locations, representing views by residents, recreational users and road users and each of these receptors were judged for their susceptibility against the value of the view.
- 4.16 Mitigation has been adopted part of the proposed development including habitat creation measures such as mixed plantation woodland, planting of native fruiting understorey species and overseeding with a native-species woodland ground flora seed mix. The elements of habitat that include enhancement of the mixed plantation woodland, planting of native fruiting understorey species and overseeding with a native-species woodland ground flora seed mix.
- 4.17 Significant cumulative visual effects are likely to occur with respect to the Proposed Development with Mynydd y Glyn and Twyn Hywel and operational schemes, consented schemes and in planning schemes. A Major significance of effect on views from the south including Rhiwgarn Road, Trebanog and Mount Pleasant, Trehafod and Darren Dyllas, Mynydd y Glyn.
- 4.18 Despite the presence of some significant landscape effects, the proposed mitigation means that the LVIA demonstrates compliance with national and local planning policy. This includes Policies 17 and 18 of Future Wales and a particular landscape and visual focus on LDP **policies (AW7 Protection and Enhancement of the Built Environment and AW8 Protection and Enhancement of the Natural Environment)**.
- 4.19 There is therefore no reason in terms of landscape and visual impact that the Proposed Development should not proceed.

### Highways and Traffic

- 4.20 A Transport ES Chapter and Transport Statement have been prepared to assess the transport related considerations of the Proposed Development. The TS demonstrates the compliance of the Proposed Development with PPW Edition 12 (2024) and Technical Advice Note 18: Transport (TAN 18).
- 4.21 Construction access for the project will be via the B4273, continuing onto Heol-Y-Mynach, Pleasant View and Bryn Ffynon, before routing to site from Llanwonno via Pen-y-Wal Road. This route will be used by general construction traffic only, with Abnormal Loads delivered via the A4058, Rhondda Road, Graigwen Road and Pen-y-Wal Road, accessing from the south.
- 4.22 The majority of traffic associated with the Proposed Development will be experienced during the construction phase. The construction period is expected to take approximately 24 months. The Site preparation phase will allow the Site to receive delivery of equipment and establish areas for equipment storage plus housing of temporary prefabricated Site offices. Through the 24-month construction period, the volume of construction traffic will peak in month 15, with 57 two-way vehicle trips forecast during a peak day, comprising 38 light vehicles and 19 heavy vehicles.
- 4.23 The construction working hours for the Site are anticipated to be 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. However, certain activities, including – but not limited to - abnormal load deliveries and turbine rotor lifts, may occasionally need to occur outside these hours.
- 4.24 Based on the projected construction traffic flows, and the mitigation provided, the traffic levels during construction and operation stages are considered low enough to avoid any significant environmental effects.

- 4.25 Once operational, the wind farm will be managed remotely and will require only occasional Site visits for maintenance, as needed. The associated vehicle movements will have a negligible impact on the surrounding highway network.
- 4.26 The planning application will include a Traffic Management Plan (TMP). This document will provide detailed information on expected construction vehicle movements and vehicle types, journey considerations for construction and maintenance staff, proposed access junction arrangements, the suitability and details of the proposed haulage route, information on the traffic management measures to be implemented, and will detail the construction working hours and duration of works.
- 4.27 Overall, it is considered that there would be no significant effects or cumulative effects are likely to occur with respect to transport, arising from the Proposed Development. The Proposed Development also demonstrates compliance with PPW 12, TAN 18: Transport, Rhondda Cynon Taf Supplementary Planning Guidance: Delivering Design and Placemaking: Access, Circulation & Parking Requirements (2021) and **Policies AW12 Renewable and Non-Renewable Energy** and **AW13 Large Wind Farm Development** of the LDP. Therefore, we consider there is no reason for not permitting the development in this regard.

### Historic Environment

- 4.28 Policy 18 of Future Wales requires that development will be considered acceptable as long as *'there are no unacceptable adverse impacts on statutorily protected built heritage assets'*. Similarly, Policy AW7 Protection and Enhancement of the Built Environment of the LDP states that *'development proposals which impact upon sites of architectural and / or historical merit and sites of archaeological importance will only be permitted where it can be demonstrated that the proposal would preserve or enhance the character and appearance of the site'*.
- 4.29 The desk-based assessment determined that the Proposed Development site lies in a remarkably untouched upland landscape from the earliest available mapping. The most significant impact to the landscape has been the installation of the Llwynceilyn wind farm to the north-west of the site. Historically, the site was agricultural in nature, which remains unchanged today.
- 4.30 The assessment identified 33 recorded heritage assets within the 1km study area, which include the Rhondda Registered Historic Landscape of Outstanding Interest (HLW (MGI) 5) and a Listed Building. The Registered Historic Landscape lies partially within the site boundary. Although there will be no direct impacts upon the key characteristics of the HLCAs that make up the Registered Historic Landscape, the overall impact is considered to be moderate.
- 4.31 Within the wider 5km study area there are fourteen Scheduled Monuments, 149 Listed Buildings, eight Conservation Areas and a Registered Historic Park and Garden. The development of the site would have a negligible impact upon the Conservation Areas and the Registered Historic Park and Garden Ynysangharad (Park PGW(Gm)3(RCT)). The development will have a moderate impact on the Scheduled Monument of Carn-y-Wiwer Cairnfield & Platform Houses (GM323) located just over 1km to the north-west of the site. There will be a negligible visual impact on the rest of the Scheduled Monuments and all of the Listed Buildings in the search areas.
- 4.32 The desk-based assessment and site walkover survey identified three new assets within the bounds of the Proposed Development, the historic drystone field boundaries, an associated boundary marker stone and possible surface quarries. The development will require parts of the drystone walls be destroyed. It is also possible that currently unknown archaeological remains survive below ground within the bounds of the site, particularly within the peat deposits across the site.
- 4.33 The following mitigation measures have been adopted as part of the Proposed Development to mitigate potential impacts on Historic Environment are a watching brief is suggested for all groundworks on site during the construction of the scheme. Although there is thought to be a low potential for archaeological features and deposits below ground across the site, the presence of the



surface quarries, the two Bronze Age findspots located in close proximity to the site and the peat deposits within the site, mean it is not possible to certain of this. A watching brief would allow any buried archaeology disturbed by the groundworks to be fully mitigated and a photographic survey should be conducted on the drystone walling that will need to be removed during the construction of the scheme. This should include the associate boundary marker stone. This would allow preservation by record of the historic field boundaries.

- 4.34 The proposed mitigation will seek to improve the current understanding of, and potential impacts upon, all identified receptors. It is anticipated that this can then be used to reduce the significance of the effect on these receptors, thereafter demonstrating compliance with Policy 18 of Future Wales and Policy AW7 of the LDP.

### Ecology and Ornithology

- 4.35 No statutory designated sites exist within 2 km of the Study Area. One Site of Interest for Nature Conservation (SINC) (the Llys Nant and Twyn-y-Glog Woodlands SINC) falls within the Study Area boundary and a further four are within 500 m. No areas of Ancient Semi Natural Woodland (ASNW) are present within the Study Area, there are two areas of ASNW immediately outside the Study Area (to the east, <5 m from the Study Area boundary) associated with Llys Nant & Graig Twyn-y-glog Woodlands SINC.
- 4.36 No significant adverse effects on Ecology are anticipated. Any adverse residual effects of significance at the Site level are anticipated on; mixed plantation woodland and water vole. Proposed mitigation will be included as part of the Proposed Development. These measures include feathering of the turbine blades, retained habitats including buffers and root zones, a preconstruction ecological survey programme, enhancement of the mixed plantation woodland, the creation of habitat piles, scrub control and fencing of field margins within the solar array.
- 4.37 For Ornithology, the study area shows the most use by red kite, which are present year-round. A red kite territory outside the study area boundary was active in both breeding seasons. Other bird species picked up in the survey work include lapwing, peregrine (infrequently), migrant osprey and honey buzzard over the non-breeding season, golden glover flights, one nightjar territory, and the study area is well used by buzzard and corvids, including raven and rook, herring gull and lesser black-backed gull. Significant adverse effects on the following ornithological receptors are anticipated for Red kites and golden plover at the local level and Lapwing at the County level.
- 4.38 Proposed mitigation for birds include the routeing and design of the solar array and access tracks to minimise impacts on the lapwing breeding area or habitats likely to be of high ecological value to most passerines, creation of Lapwing Management Areas and the provision of bird boxes in Perry's Wood.
- 4.39 Policy 18 of Future Wales requires that development will be considered acceptable as long as '*the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity*'. This is further supported in PPW 12 where policy seeks to '*reverse the decline in biodiversity and increase the resilience of ecosystems*' and recognises that if development does not to take place and biodiversity is impacted '*the planning system should ensure that overall, there is a net benefit for biodiversity and ecosystem resilience*'. Necessary habitat creation, restoration and enhancement measures has been prepared. Protected and notable species protection measures would also be factored into the Proposed Development.
- 4.40 **AW8 Protection and Enhancement of the Natural Environment** seeks to protect Rhondda Cynon Taf's distinctive natural heritage from inappropriate development, ensuring it is preserved and enhanced. Examples of how this will be complied with are demonstrated through the proposed mitigation and appreciation of the relevant national planning policy above.

## Hydrology and Flood Risk

- 4.41 Impacts on hydrology and flood risk have been identified through a combination of desk-based analysis and site-specific surveys. Desk based analysis of existing studies and datasets were used to identify waterbodies, baseline and future flood risk and water use within the study area. The ES chapter and associated Flood Consequence Assessment (FCA) consider the potential impacts on hydrology and flood risk during the construction, operation and maintenance and decommissioning phase of the Proposed Development. The assessment considered the potential impacts on the deterioration of water quality of waterbodies (surface water and ground water) and the impact of increased flood risk arising from additional surface water runoff.
- 4.42 The Site is located within Flood Zone 1 / DAM Zone A has a low risk of flooding from all assessed sources. Nearest areas of flood risk to the Site are located within the southern extent of the study area, in association with flood risk from Rhondda Afon.

## Noise and Vibration

- 4.43 Baseline noise monitoring was undertaken at five nearby noise-sensitive receptors over a period of 4-weeks to establish the prevailing noise climate in the area. The monitoring was undertaken in accordance with the Good Practice Guide with the results analysed in order to derive day and night-time noise limits in accordance with ETSU-R-97. The predicted noise levels from all assumed construction plant and activities are shown to be comfortably below the adopted criterion of 70dB LAeq and therefore effects would be temporary and not significant.
- 4.44 PPW paragraph 5.9.20 states '*planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account.....the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations*'. Additionally, Policy 18 of Future Wales requires that there are '*no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance*'.
- 4.45 The adoption of Best Practicable Means for construction activities to minimise noise as far as practicable will ensure that the relevant policy for noise and vibration is complied with.

## Planning Policy Assessment Conclusions

- 4.46 The Assessment above considers that the Proposed Development would not result in any unacceptable adverse effects in terms of environmental or technical considerations and would therefore accord with the key policies in Future Wales, namely Policies 17 and 18, other relevant policies of the NDF and relevant LDP policy. The proposal is therefore in conformity with the Development Plan as a whole.
- 4.47 The Proposed Development would improve the economic, social, environmental, and cultural well-being of Wales, in accordance with the sustainable development principle, under Section 3 of the Well-being of Future Generations (Wales) Act 2015 (WBFG Act). It is also in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being goals as set out as being required by Section 8 of the WBFG Act.
- 4.48 Section 5 of PPW highlights where contribution to be made to each of the seven goals of the WBFG Act including the following with reference to the goals set out in the Act:
- (A Prosperous Wales) - Investment in renewable and low carbon energy sources.
  - (A Resilient Wales) - Renewable energy generation.

- (A Healthier Wales) - Reduction in emissions and air pollution as a result of generating energy from non-carbon sources. Greater distribution of our economic wealth can also help alleviate poverty which is a key determinant of health.
- (A More Equal Wales) – Promotion of sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.
- (A Wales of Cohesive Communities) - Created by people who have access to fulfilling work.
- (A Wales of Vibrant Culture and Thriving Welsh Language) - Supported by the provision of jobs and economic activity.
- (A Globally Responsible Wales) – Reduction of carbon footprint through the promotion of renewable energy over carbon emitting sources and resource choices through which multiple benefits can be realised.

4.49 As such, through the benefits of the Proposed Development (including renewable generation and carbon savings, economic impact and job creation) the proposal is considered to be in accordance with all seven of the Well-being goals as set out in the WBFG Act.

## 5 PLANNING BALANCE AND CONCLUSIONS

- 5.1 As a result of the planning policy assessment, the key matters to be addressed in the planning balance are as follows:
- The overall principle of the proposed renewable energy development in accordance with national and local planning policy;
  - The enhanced export capacity and energy generation as a result of the hybrid development proposals for wind and solar energy;
  - The key benefits of the proposed development as a combined wind, solar and BESS development with a focus on wider environmental and local benefits including work with the University of South Wales to decarbonise their campus with local green power; and
  - The overall need for renewable energy to generate electricity to meet international and national targets.
- 5.2 Future Wales and PPW strongly support renewable energy and renewable energy targets. They also recognise the significant energy resource that can be provided by onshore wind development. However, both documents make it clear that any development of this nature needs to demonstrate acceptability in terms of minimal adverse environmental effects and careful consideration of development location.
- 5.3 To combat climate change through decarbonisation of the energy system, Wales and the UK, require new renewable sources of energy, which will ensure that a secure supply of electricity is available to meet the increased future demand. The provision of new renewable energy capacity (through Wind) will help the Welsh Government meet legally binding national and international commitments on climate change.
- 5.4 This Planning Statement demonstrates that the Proposed Development accords with local and national planning policy and highlights the substantial need for this type of development to meet targets for renewable energy generation.
- 5.5 Future Wales is clear that decision makers must give significant weight to Wales's need to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030. We recognise that the Proposed Development will result in some adverse effects, it is considered that these impacts are outweighed by the Proposed Development's contribution to meeting national and international renewable energy targets, in an 'appropriate' location and providing other residual benefit to the local and wider communities and economies.
- 5.6 The proposal is therefore in conformity with the Development Plan as a whole. This is **the** material consideration and carries full weight in the consideration of the acceptability in planning terms of the Proposed Development.
- 5.7 Therefore, it can accordingly be concluded that the Proposed Development should be granted planning permission.