

Planning, Design and Access Statement.

For a Proposed Battery Energy Storage System (BESS) with Associated Infrastructure, including Substation, Earthworks, Access, Drainage, Landscaping and Underground Cable Route.

Land North and South of National Road, Cilfynydd

On behalf of REWE 2 Ltd (Windel Energy & Recurrent Energy).

Date: 18.02.2025 | Pegasus Ref: P22-2733

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1. Introduction

- 1.1. Pegasus Group has been instructed by REWE 2 Ltd ('the Applicant') to submit a planning application for development on Land North and South of National Road, and at Cilfynydd 400kV Substation, Cilfynydd (Easting: 309600, Northing: 193457) ('the Site').
- 1.2. The planning application is for the construction and operation of a Battery Energy Storage System (BESS) with Associated Infrastructure, Earthworks including On-Site Substation, Access, Drainage, Landscaping and Underground Cable Route Connection ('the Proposed Development').
- 1.3. The Applicant for the Proposed Development is REWE 2, a subsidiary of Windel Energy and Recurrent Energy.

Windel Energy

- 1.4. Founded in 2018, Windel Energy is a privately held company dedicated to driving the transition towards a sustainable future. Specialising in the origination, development and integration of renewable energy projects and low-carbon disruptive technologies, Windel Energy is at the forefront of clean energy innovation. With a portfolio exceeding 5 gigawatts of renewable power in various stages of development, our team of talented professionals bring a deep understanding & high level of expertise in land viability, electricity networks, planning frameworks, legal processes and construction feasibility.

Recurrent Energy

- 1.5. Recurrent Energy is one of the world's largest and most geographically diversified utility-scale solar and energy storage project development, ownership and operations platforms. With an industry-leading team of in-house energy experts, Recurrent Energy are wholly-owned subsidiary of Canadian Solar Inc. and function as Canadian Solar's global development and power services business.
- 1.6. Recurrent Energy has completed the development of 9 gigawatts (GWp) of operating utility-scale solar projects and 3.7 gigawatt hours (GWh) of energy storage projects across six continents. They have more than 27 GWp of solar and 63 GWh of battery storage projects under development.

Submission Documents

- 1.7. This application is supported by the following documents:

Plans and Elevations:

- Site Location Plan;
- Proposed Site Layout Plan;
- Elevation Plans (battery storage units and associated infrastructure and structures);
- Floor Plans (battery storage units and associated infrastructure and structures);

- Drainage Strategy;
- Levels Strategy;
- Indicative Landscape Masterplan;
- Access Drawings; and
- Illustrative Landscape Section.

Reports:

- Planning, Design and Access Statement;
- Transport Statement;
- Construction Traffic Management Plan;
- Economic Benefits Infographic;
- Landscape and Visual Impact Assessment including Photomontages;
- Heritage Statement;
- Ecological Impact Assessment;
- Biodiversity Management Plan;
- Flood Consequences Assessment and Surface Water Drainage Strategy;
- Tree and Hedgerow Survey;
- Arboricultural Impact Assessment;
- Noise Impact Assessment;
- Outline Battery Safety Management Plan;
- Phase 1 Geo-Environmental Assessment;
- Green Infrastructure Statement; and
- Archaeological Evaluation Report.

- 1.8. The planning application has been subject to the pre-application process with Rhondda Cynon Taf County Borough (RCTCB) Council and the details of this are found in the next section of this Planning Statement. This version of the Planning Statement has been prepared for the purposes of Pre-Application Consultation (PAC).
- 1.9. This Planning Statement provides information on the development proposal, exploring the relevant planning policy context before providing an assessment of the Proposed Development against the relevant local and national policies (as well as any other relevant material considerations).

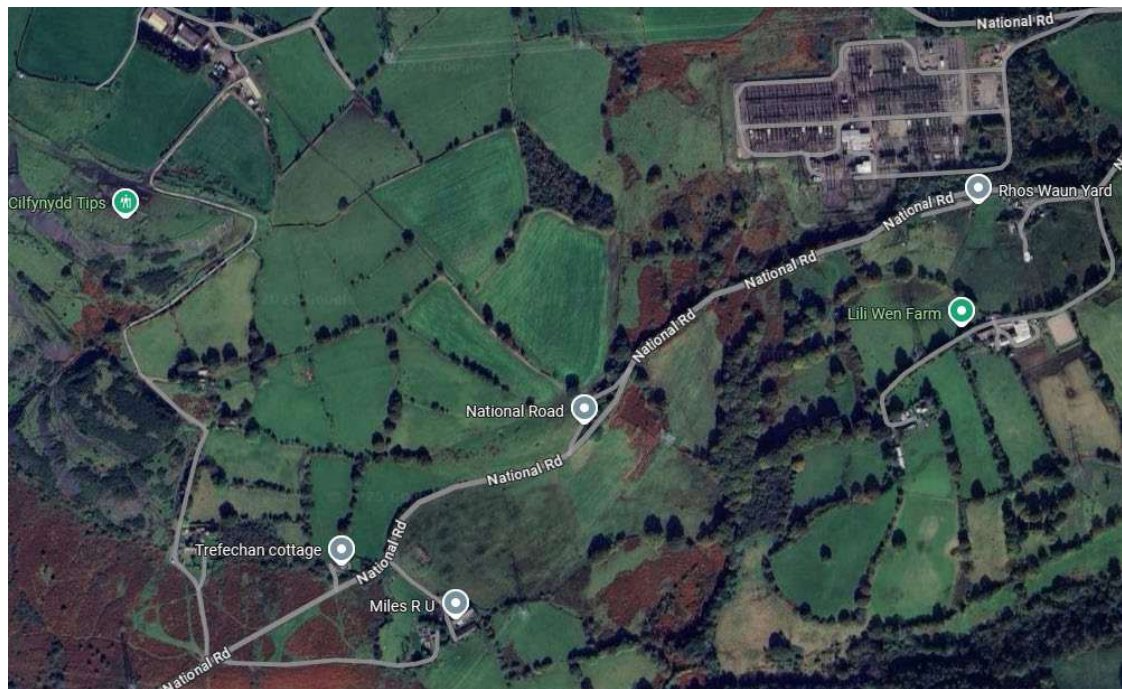
1.10. The remaining structure of the Planning Statement is as follows:

- **Section 2** – provides a description of the Site, and considers its planning history along with applicable constraints;
- **Section 3** – describes the Proposed Development in detail;
- **Section 4** – sets out the relevant planning policy;
- **Section 5** – provides context on site identification;
- **Section 6** – assesses the scheme against the planning policy context;
- **Section 7** – summarises and concludes.

2. Site Description

- 2.1. The Application Site is approximately 24 ha in size, with a cumulative developable area including the BESS development and substation totalling approximately 3.9 ha. The Site is located across a number of field parcels located north and south of National Road and includes land to the west of Cilfynydd 400kV Substation and the Substation itself within the Site Location Plan.
- 2.2. The proposed BESS components and substation (the built development) are within the administrative area of RCTCB Council. The proposed underground cable route connection is located mainly within RCTCB Council, however, the cable route extends into the administrative area of Caerphilly County Borough (CCB) Council where it connects into Cilfynydd 400kV Substation, the point of connection for the Proposed Development.

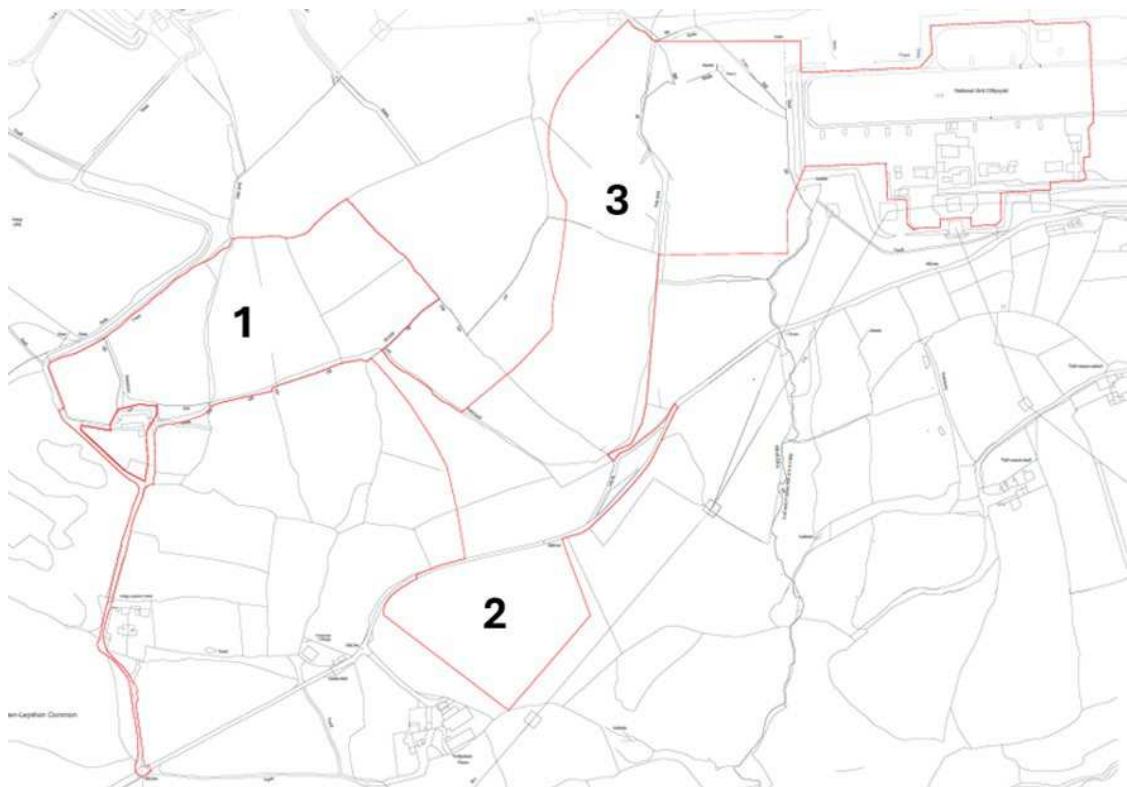
Figure 2.1 – Aerial Image of the Site



- 2.3. The Site is located approximately 1km north-east of the village of Cilfynydd and approximately 3.5km north-east of the town of Pontypridd. The Site is approximately 400m south of the Garth Hall Farm and the Llechwen Hall Hotel and approximately 350m south of the associated farm outbuildings/Garth-Fawr. A small cluster of residential properties are located adjacent to the eastern boundary of the proposed access route, with the proposed BESS equipment located approximately 250m north. The proposed substation is located approximately 50m north-east of Trefechan Farm and 150m west of Trefechan Cottage. The Site includes the Cilfynydd 400kV Substation to enable the cable route to be connected to the National Grid.
- 2.4. The Site comprises of a northern area (Parcel 1) and southern area (Parcel 2) and an area east of the northern parcel (Parcel 3), each area extending over a number of agricultural field parcels of irregular shape and size. Parcel 1 connects to Parcel 2 via an area of agricultural land, adjoining National Road. Parcel 3 extends north-east and encompasses the Cilfynydd

400kV Substation to provide the cable route connection to the National Grid. An existing access track south of Parcel 1 connects this parcel to National Road. The proposed access track to the Site runs east to west across Parcel 3 and adjoins the southern boundary of Parcel 1. Tynewydd Cottages and a cluster of farm buildings are located approximately 180m north of Parcel 3. Figure 2.2 below depicts Parcels 1, 2 and 3 of the Proposed Development. Parcel 1 is where the proposed BESS development will be located, Parcel 2 is where the proposed substation will be located and Parcel 3 is where the buried cable corridor is proposed.

Figure 2.2 – Site Parcels



- 2.5. The Site largely consists agricultural field parcels with occasional hedgerows and intermittent trees. The field parcels within Parcel 3 are bounded by a number of trees and a triangular area of woodland is located within the central area of Parcel 3. Overhead powerlines and a pylon are located adjacent and to the north of Parcel 3. The topography of the Site is undulating with the land rising from National Road to the very northern part of the Parcel 1 and falling from National Road to the southern part of Parcel 2. The surrounding topography within the wider surrounding largely follows the topography present on the Site.
- 2.6. There are no Public Rights of Way ('PRoW') within the Site boundaries. Within RCTCB Council, PRoW ABC/28/2 and PON/1/1 are located in the vicinity of the Site, approximately 300m west of Parcel 1 and approximately 300m south of Parcel 2, respectively. Within CCB Council, PRoW NELS/FP23/1 is situated approximately 280m south-east of Parcel 2 and PROW NELS/FP23/1 is situated approximately 150m east of Parcel 3. In addition, PROW NELS/FP115/1 is located approximately 200m north of Parcel 3. PROWs are shown in Figure 2.4 of the Construction Traffic Management Plan.

- 2.7. The Site is currently in pastoral agricultural use. Parcel 1 constitutes agricultural land Grade 4 (Poor) and 5 (Very Poor). Parcel 2 and 3 wholly fall within Grade 4 agricultural land. This means that there is no land on the Site that has been identified of 'Best and Most Versatile' (BMV) grade agricultural land.
- 2.8. The Site lies within the 'Taff Vale Eastern Slopes' Special Landscape Area (SLA) within RCTCB Council. A small part of the Site to the very west is located within Craig-Evan Leyshon Site of Importance for Nature Conservation (SINC). The Site is also located immediately adjacent to the Cilfynydd Coal Tips 'Regionally Important Geodiversity Site' (RIGS).
- 2.9. With regards to heritage matters, there are no heritage assets directly on the Site itself nor are there any Listed Buildings or Conservation Areas in proximity to the Site. A Scheduled Ancient Monument (Prehistoric Rock Art at Tai'r Waun Isaf) is located approximately 350m west of the Site.
- 2.10. The Flood Map for Planning identifies that the Site has a very low risk of flooding from Rivers or the Sea. The majority of the Site also has a very low risk of flooding from Surface Water and Small Watercourses. Part of Cilfynydd 400kV Substation falls with high-medium Flood Risk from Surface Water and Small Watercourses.
- 2.11. As addressed above, in terms of existing electrical infrastructure, there is the existing Cilfynydd 400kV Substation located within the western part of the red line boundary for the Site. This is located within the boundary of CCB Council and is the point of connection (POC) for the Proposed Development. Overhead lines and pylons are also located in proximity to the Site.

Planning History

Site History

- 2.12. There have been no formal planning applications recorded on the Site in the last 10 years.

Rhondda Cynon Taf – Pre-Application Submission (December 2022)

- 2.13. A formal request for Pre-Application advice was made to RCTCB Council in respect of the Proposed Development (application reference: 22/5126/41) in December 2022 and Pre-Application advice was received in February 2023. The response sets out the relevant constraints, planning policies and considerations. The advice offered recognises that development in locations outside of the defined settlement boundaries would not ordinarily be supported, however, there are some exceptions to this including for renewable energy proposals. The response recognises the importance of renewable energy and low carbon developments in national and local policy and states their support for developments that would help to tackle the climate emergency. The response notes that '...whilst the development would not directly attribute to the Welsh Government's renewable energy targets, it would help in the general distribution of energy from renewable sources.' Furthermore, the response then provides advice in regard to a range of technical areas. This advice has been taken on board and addressed through the relevant technical information submitted as part of this application.

Rhondda Cynon Taf – EIA Screening Request (December 2022)

- 2.14. An EIA Screening Request (application reference: 23/0019/35) to RCTCB Council also accompanied the above pre-application submission. A Screening Opinion was issued in February 2023 confirming that the Proposed Development does not require an EIA.
- 2.15. At the time of the original Pre-Application and EIA Screening Request in December 2022, as set out above, the cable route to connect the Proposed Development to the point of connection (POC) at Cilfynydd 400kV Substation was not included within the red line boundary. Consequently, the cable route aspect of the Proposed Development within Parcel 3 was not assessed as part of these requests. Following receipt of the Pre-Application and Screening Opinion, however, the Applicant considered including the cable route within the red line boundary, to then be proposed within the adopted highway. This change resulted in the boundary of the Application Site extending into the administrative boundary of CCB Council, in addition to a revised scheme design and an amended red line boundary. These changes were subsequently discussed with the Case Officer and it was confirmed that based on the information provided, that the initial conclusion established within the EIA Screening Opinion remained appropriate.

Caerphilly County Council – EIA Screening Request (November 2023)

- 2.16. Notwithstanding the feedback from RCTCB, an EIA Screening Request (application reference: EIASCR/23/0002) was submitted in November 2023 to CCB Council in relation to the Application Site, which confirmed the Proposed Development does not require an EIA. The Screening Request was submitted as a portion of the Site (i.e. the land comprising the proposed buried cabling only) falls within the jurisdiction of CCB Council.

Rhondda Cynon Taf Council – Enhanced Pre-Application (October 2024)

- 2.17. Subsequently, the design evolved to propose a cable route connection through private agricultural fields (Parcel 3) to the east of Parcel 1 and west of Cilfynydd 400kV Substation to connect into the National Grid. Changes to the proposed cable route (previously within the highway) mean that there will be a reduced impact on the highway network to the previous proposed cable route. Furthermore, changes were also made to the scheme to reduce the amount of built development proposed with only BESS units and supporting infrastructure proposed to the northern parcel and only a single substation to the southern parcel, to respond to feedback from environmental surveys. In light of the changes, an Enhanced Pre-Application (application reference: 24/5087/PRE) was submitted to RCTCB Council to seek their views on the revised scheme.
- 2.18. Following the multiple amends to the scheme, Enhanced Pre-Application Advice from the RCTCB Council was sought in October 2024 (ref. 24/5087/PRE). A meeting was held to discuss feedback in December 2024, and a written response was received in February 2025 which outlined that *‘the principle of the proposed development could be acceptable, subject to further assessment’* of other criteria set out in the pre-application including landscape, privacy and amenity, ecology and trees, drainage and contaminated land’.

Site History of Nearby Sites

- 2.19. Beyond the Site, to the north of the Cilfynydd 400kV Substation, a Pre-Application was submitted (application reference: 23/5043/PRE). Although the specific details regarding the

proposals are not public, there has been no subsequent application submitted when viewing the Public Access on the RCTCB Council website.

- 2.20. Within the administrative area of CCB Council, an application was granted on 14 December 2023 for the erection of a synchronous condenser with ancillary infrastructure and associated works and a cable connection (application reference: 23/0470/FULL). This site is located directly east of the Cilfynydd 400kV Substation. Matters regarding cumulative impact with respect to this approved application are discussed in the relevant parts of the Statement.
- 2.21. The Twyn Hywel Energy Park, a Development of National Significance, (application reference: DNS/3272053), was approved by the Welsh Government on 5 November 2024 for the construction and operation of up to 14 wind turbines and associated infrastructure on the border of Caerphilly and Rhondda Cynon Taf. Parcel 3 of the Application Site is approximately 300m north-west of the Twyn Hywel Energy Park site. As aforementioned, matters in respect of cumulative impact are addressed within the relevant parts of this Statement.

3. Proposed Development

- 3.1. The Proposed Development comprises BESS with associated infrastructure, including on-site substation, subsurface cable, earthworks, access, drainage and landscaping. Parcel 1 will comprise of the battery energy storage units with supporting infrastructure and Parcel 2 will comprise of the substation which the underground cable route will connect from into the POC. The cable route is proposed to connect from the proposed on-site substation in Parcel 2, running below ground through the field parcels across Parcel 3 and connecting to the POC at Cilfynydd 400kV Substation.
- 3.2. Temporary planning permission is sought for a period of circa 40 years from energisation. Due to the time restricted nature of the development, the Site will be reinstated and agricultural land use will be retained in the long term once the use of the Site ceases.
- 3.3. The following components are depicted on the submitted plans:

Parcel 1

- 142no. containerised battery energy storage units sited in pairs measuring approx. 6m in length x 2.4m in width x 2.9m in height to be placed on development platforms;
- 71no. inverter/transformer stations (SMA) measuring approx. 6m in length x 2.4m in width and 2.9m in height;
- 7no. auxillary transformers measuring approximately 7.2m in length x 3.4m in width and 2.7m in height;
- 3no. spare parts containers measuring approximately 13.7m in length x 2.4m in width and 2.6m in height;
- 4m high acoustic fencing, 2m high deer fencing and 2.4m high palisade security fencing to enclose the developable area; and
- Relevant communications equipment including inward facing CCTV measuring a height of 2.4m.

Parcel 2

- 1no. 33/400kV transformer;
- 3no. bus bars at a height of approximately 9.4m and 3no. high level bus bars at a height of approximately 12m;
- 1no. earthing/auxiliary transformer (EAT) measuring approximately 2.7m in height;
- 3no. harmonic filters measuring approximately 6m in height;
- 3no. cable sealing ends measuring approximately 7.6m in height;
- 1no earth switches measuring approximately 8.7m in height;

- 1no. circuit breakers measuring approximately 6.6m in height;
- 1no. disconnector at a height of approximately 9.1m;
- 3no. surge arrestors at a height of approximately 8.6m;
- 1no. control room measuring approximately 5.9m in height;
- 3no switchgear cabinets measuring approximately 3.1m in height; and
- 4m high acoustic fencing and 2.4m palisade fencing security fencing to enclose the substation.

3.4. The equipment and infrastructure are shown on the accompanying planning application plans. The Design and Access section of this statement sets out further detail in relation to the design of the proposed scheme.

Parcel 3

- 3.5. A buried cable route connection will connect the substation across national road and field parcels into the POC at Cilfynydd 400kV substation. An indicative cable route within a cable corridor is shown on the accompanying plans measuring approximately 700m in length. Further details about the proposed cable route can be found in **Appendices 2 and 3**.
- 3.6. As set out in the Construction Traffic Management Plan and Transport Statement submitted to accompany this application, construction and operational access will be obtained from National Road to both the northern and southern development parcels. Once the development has been constructed and is within operational use, there will be minimal vehicle movements which relate to the servicing and maintenance of the equipment which will predominantly be done remotely with limited visits to the Site. A separate emergency access will be accessed from National Road. 3no. parking spaces are proposed adjacent to the substation in the southern development parcel.
- 3.7. The BESS development will have a capacity of approximately 200MW, allowing for the influx, storage and outflux of energy generated by renewable energy sources such as solar and wind farms. This is essential during times of peak and low levels of energy generation and can allow for a more consistent supply of renewable energy.
- 3.8. The Site has been carefully selected to take into consideration the operational, commercial, environmental constraints and the planning policy context. The Site Identification, as set out in Section 5, specifically explains the site selection process and why this Site has been selected for the proposed development. The Site is located in close proximity to the POC, where there is a secured grid connection, it is not in proximity to residential areas and there are limited constraints on the Site.
- 3.9. In addition, the Proposed Development will deliver a net benefit to nature and a Biodiversity Management Plan has been prepared to outline the biodiversity protection and enhancement measures for the Proposed Development. A Green Infrastructure Statement also accompanies the application which details how Green Infrastructure has been incorporated into the proposals.

4. Planning Policy Context

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(4) sets out that for the purpose of any land in Wales, the development plan is a. the National Development Framework for Wales; b. any strategic development plan for an area that includes all or part of that area, and; c. the local development plan for that area.
- 4.2. To note, the policy context below refers to policies and guidance applicable to both energy storage and energy generation, as energy storage technologies support and facilitate renewable energy generation schemes, maximising the contribution from green energy sources and improving reliability and efficiency.
- 4.3. The development plan for the Site is:
- The National Development Plan – Future Wales: The National Plan 2040 (February 2021); and
 - The Local Development Plan – RCTCB Council Local Development Plan (LDP) 2006 – 2021 (adopted March 2011) and the CCB Council LDP (adopted November 2010).
- 4.4. Other material considerations include:
- National and Local Energy Policy;
 - Planning Policy Wales Edition 12 (PPW, 2024);
 - National Policy Statements for Energy;
 - The emerging Strategic Plan;
 - Emerging Local Plans; and
 - Supplementary Planning Guidance/Documents.

Adopted Development Plan Policy

Future Wales: The National Plan 2040 (February 2021)

- 4.5. Future Wales provides a spatial context for facilitating the delivery of development in Wales over the next 20 years and constitutes part of the Development Plan in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 4.6. Future Wales will be used to guide both public and private investment. The aim of the Welsh Government is to ensure investments and developments – whether large or small in scale – contribute to the broader ambitions of the Welsh Government and to the well-being of communities. Therefore, Future Wales will influence how communities develop over the next 20 years and it is important that we have a comprehensive understanding of the positive and negative effects this could have as the plan develops. Future Wales is the national development framework for Wales and has development plan status.

- 4.7. Page 15 of Future Wales identifies how Future Wales does not contain statements on all land use matters but it provides specific policies on issues which the Welsh Government considers them to be a national policy at this time. On Page 99, it states *“There is also a need to consider large-scale energy storage as part of the energy system to provide grid balancing”* in addition to setting out that *“The Welsh Government will support regional and local energy planning to identify opportunities for all types of renewable projects”*. On Page 171, it sets out that *“The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South East economy.*
- 4.8. In the ‘Introduction’ to Future Wales, achieving decarbonisation and climate-resilience are noted as being one of the *“key national priorities”* for Wales. Indeed, Future Wales only includes policies *“on issues where the Welsh Government considers a national priority at this time, or matters which are distinctly spatial and require national leadership. For example, ...deciding where to locate renewable energy generation technology is a spatial issue of such significance that national ambitions are unlikely to be achieved without national planning policies.”* It also acknowledges that Wales faces a climate emergency.
- 4.9. It is clear that delivering renewable energy generation, storage and management is one of the Welsh Government's top national priorities for the next 20 years. Future Wales sets out 11 outcomes that can be achieved by 2040 provided the planning system is focused on the long-term and provides quality development in the right places for the right reasons.
- 4.10. The Proposed Development would contribute towards ‘Outcomes’ 9, 10 and 11, these are:
- **Outcome 9 – A Wales where people live in places that sustainably manage their natural resources and reduce pollution:** *“Wales’ natural resources, including its minerals, soils and geodiversity, coast, water, forests and landscape support a range of activities and sectors and are assets of great value in their own right. The environmental, social and cultural value of our resources will be managed, maintained and enhanced, while economic benefits will be utilised sustainably and appropriately by promoting nature-based solutions and a circular economy. Across Wales the risks of flooding and coastal erosion will be effectively managed and mitigated while better resource choices will be reflected in more sustainable places. Places will benefit from reduced pollution and be healthier and more liveable”.*
 - **Outcome 10 – A Wales where people live in places with biodiverse, resilient and connected ecosystems:** *“The variety of flora and fauna found across Wales make Wales a special place. Biodiversity underpins the functioning of healthy, resilient ecosystems and the multiple benefits they provide. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems. The planning system will ensure wildlife is able to thrive in healthy, diverse habitats, both in urban and rural areas, recognising and valuing the multiple benefits to people and nature”.*
 - **Outcome 11 – A Wales where people live in places which are decarbonised and climate resilient:** *“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. Decarbonisation commitments and renewable energy targets will be treated as opportunities to build a more resilient and equitable low-carbon economy, develop clean and efficient transport infrastructure, improve public health and generate skilled jobs in new sectors.*

New homes will be energy efficient and will help communities adapt to the changing climate”.

- 4.11. Future Wales sets a clear direction of how Wales should be investing in infrastructure and development for the greater good of Wales and its people – the provision of renewable energy is firmly embedded to this future direction. In terms of the specific policies, **Policy 17** (Renewable and Low Carbon Energy and Associated Infrastructure) 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. 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 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency”.*
- 4.12. The Policy also establishes that *“all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Furthermore, “Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.”*
- 4.13. The amplification of Policy 17, in addition to Policy 18 (Renewable and Low Carbon Energy Developments of National Significance), identifies how *“Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of our commitment to decarbonisation and tackling the climate emergency”.* It goes on to set out the ambitious targets which have been set for renewable energy generation, including 70% of electricity consumption to be generated from renewable energy by 2030.
- 4.14. Policy 17 recognises the wealth of current and emerging renewable energy technologies that can contribute towards our energy and decarbonisation targets. It also demonstrates the Welsh Government’s support in principle for all renewable energy projects and technologies. Proposals should ensure there is no significant unacceptable detrimental impact on the surrounding natural environment and local communities and that the development delivers positive social, environmental, cultural and economic benefits.
- 4.15. On the issue of alternatives, Page 97 of Future Wales states, *inter alia*, *“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”.*
- 4.16. In respect of the regional approach, Future Wales locates the Application Site within the south east region. As mentioned above, Page 171 establishes how the provision of renewable energy is vital for the south east to play its role in decarbonising. It states, *inter alia*, that *“It is vital the region plays its role in decarbonisation and supports the realisation of renewable energy. Policies 17 and 18 set out Future Wales’ approach to renewable energy generation across Wales. 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”.*

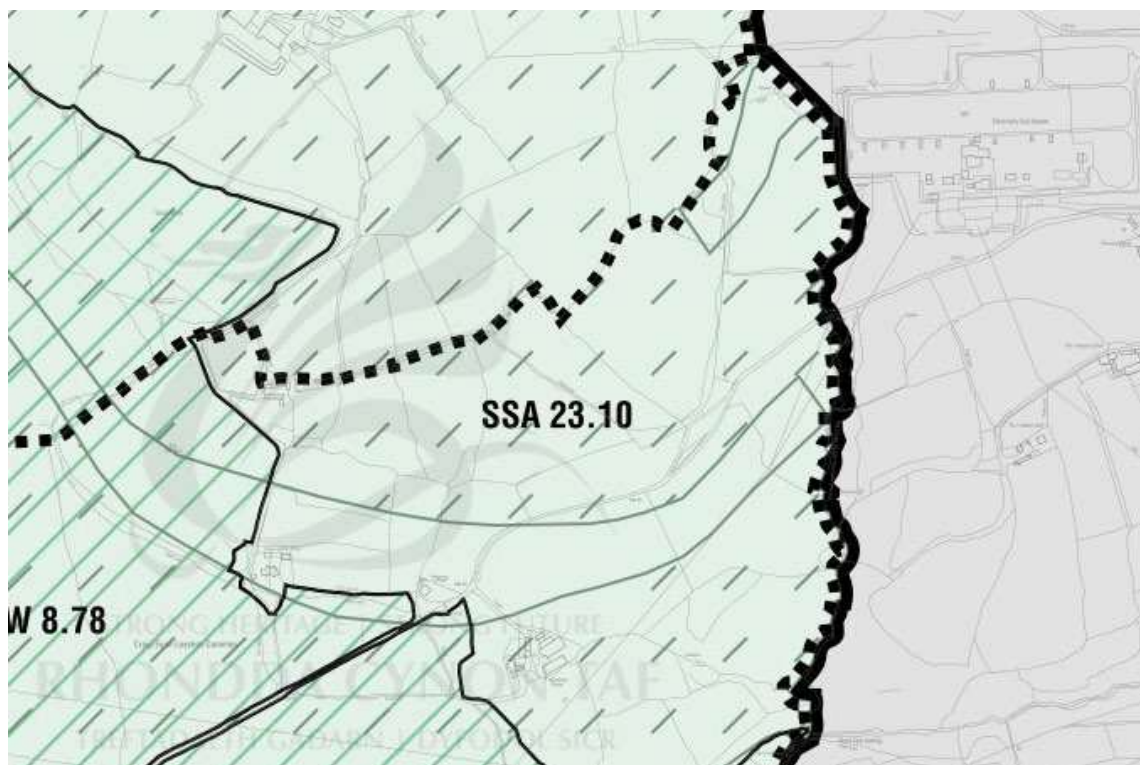
Local Plan

- 4.17. The Development Plan for the Site constitutes the RCTCB Council Local Development Plan (LDP) 2006–2021 (adopted 2 March 2011) and the CCB Council LDP (adopted 23 November 2010). Both LDPs are undergoing review with the new LDPs expected to be adopted in May 2026 for RCTCB and in August 2027 for CCB.

Rhondda Cynon Taf LDP (Adopted March 2011)

- 4.18. RCTBC Council formally adopted their LDP in March 2011 for the period of 2006 to 2021. Whilst the plan period has now passed, The Planning (Wales) Act 2015 introduced provisions specifying the period to which a plan has effect and providing that it shall cease to be the LDP at the end of the specified period. These provisions commenced on 4 January 2016 but do not have retrospective effect and therefore, the provisions do not apply to LDPs adopted prior to this date and plans adopted before 4 January 2016 will remain the LDP for determining planning applications until replaced by a further LDP. This was clarified in guidance published by the Minister on 24 September 2020. As such and as set out in the pre-application responses, the existing Plan remains the development plan for consideration when determining this planning application.
- 4.19. An extract of the LDP Proposals Map for the Site is included below in Figure 4.1. The Site is located within a Special Landscape Area, Taff Vale Eastern Slopes, and a Sandstone Resources Area. The Site is adjacent, along the western boundary of Parcel 1, to an area of Site of Important Nature Conservation.

Figure 4.1 – RCTCB Council Proposals Map



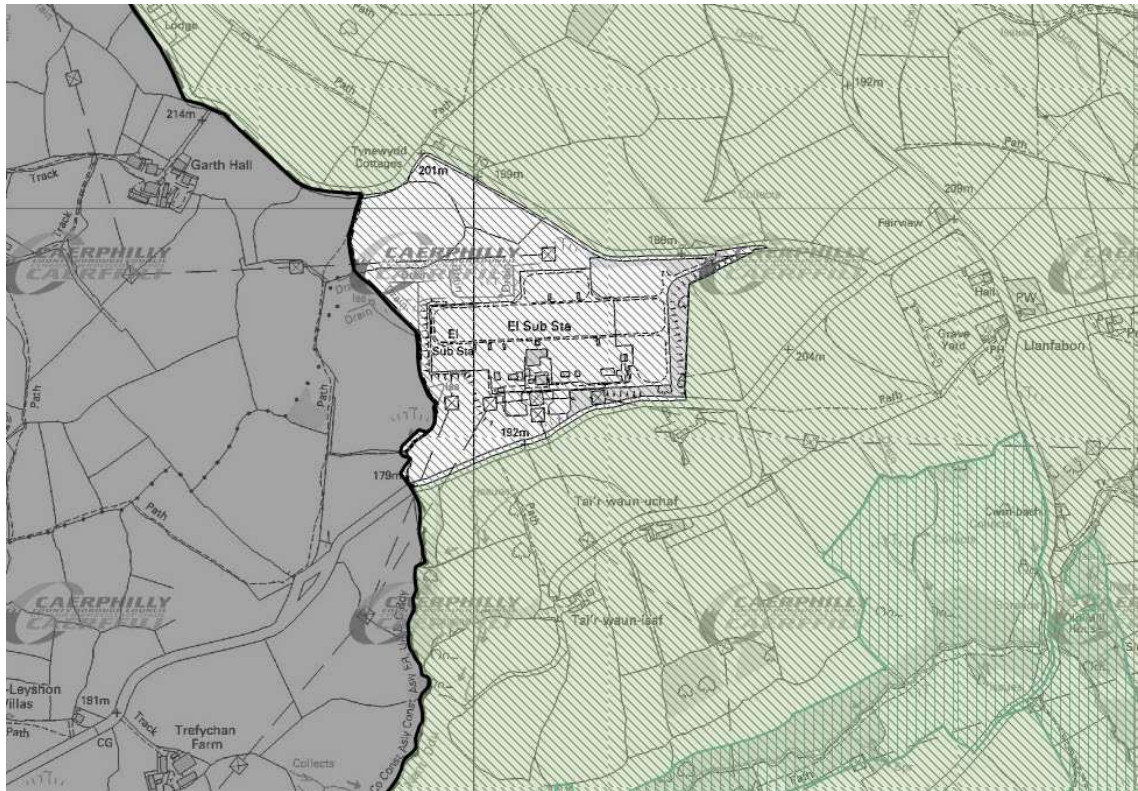
- 4.20. The relevant policies are outlined below and are summarised in **Appendix 1:**

- Policy CS1 – Development in the North
- Policy CS2 – Development in the South
- Policy CS10 – Minerals
- Policy AW2 – Sustainable Locations
- Policy AW4 – Community Infrastructure & Planning Obligations
- Policy AW5 – New Development
- Policy AW6 – Design and Placemaking
- Policy AW7 – Protection and Enhancement of the Built Environment
- Policy AW8 – Protection and Enhancement of the Natural Environment
- Policy AW10 – Environmental Protection and Public Health
- Policy AW12 – Renewable & Non-Renewable Energy
- Policy AW14 – Safeguarding of Minerals
- Policy SSA23 – Special Landscape Areas

Caerphilly County LDP (Adopted November 2010)

- 4.21. CCB Council formally adopted their LDP in November 2010 for the period of up to 2021. This remains the adopted LDP for the Council in accordance with the legislation identified above. The adopted LDP identifies locations for new development and provides a framework for decision-making for CCB.
- 4.22. An extract of the LDP Proposals Map for the Site is included below in Figure 4.2. The Site, specifically the POC at Cilfynydd 400kV Substation which crosses the CCB administrative area. This area of the Site is also within a Sandstone Safeguarding Area. The Site and substation are surrounded by the Special Landscape Area, Mynydd Eglwysilan, but are not located within it.

Figure 4.2 – CCB Council Proposals Map



4.23. The relevant policies are outlined below and are summarised in Appendix 1:

- Policy SP2 – Development Strategy – Development in the Northern Connections Corridor
- Policy SP5 – Settlement Boundaries
- Policy SP6 – Placemaking
- Policy SP8 – Mineral Safeguarding
- Policy SP10 – Conservation of Natural Heritage
- Policy CW1 – Sustainable Transport, Accessibility and Social Inclusion
- Policy CW2 – Amenity
- Policy CW3 – Design Considerations – Highways
- Policy CW4 – Natural Heritage Protection
- Policy CW5 – Protection of the Water Environment
- Policy CW6 – Trees, Woodland and Hedgerow Protection
- Policy CW15 – General Locational Constraints

- Policy CW19 – Locational Constraints – Rural Development and Diversification
- Policy CW22 – Locational Constraints – Minerals

Other Material Considerations

- 4.24. There are a number of material considerations to take into account as part of considering the planning application in accordance with Section 38(6) of the Town and Country Planning Act which are set out below.

National Policy Material Considerations

Prime Minister's National Statement at COP29 (November 2024)

- 4.25. On 12 November 2024, the Prime Minister, Keir Starmer, delivered a National Statement at COP29 in Baku, Azerbaijan.
- 4.26. The Prime Minister addressed that *"Climate action is at the heart of this government's mission for the protection and prosperity of Britain and the world"*, including through driving the green energy transition. The Prime Minister set the UK's 2035 international target, a nationally determined contribution to reduce all greenhouse gas emissions by at least 81% on 1990 levels.

Clean Power 2030: Action Plan: A new era of clean electricity (December 2024)

- 4.27. This Action Plan seeks to rapidly tackle three major challenges: the need for a secure and affordable energy support, the creation of essential new energy industries and the need to reduce greenhouse gas emissions and limit contributions to the damaging effects of climate change. To meet the ambition, it is set out that flexibility of the wider electricity system is key and that 23-27 GW of battery capacity is targeted, with the majority of the increase anticipated to come from grid-scale batteries.
- 4.28. The Action Plan sets out its aims to clean power, including to encourage and increase battery energy storage as part of achieving flexibility of the wider electricity system. The benefits of Battery Storage are also recognised including that they can 'reduce the amount of generation and associated network that needs to be built to meet peak demand, helping Britain reach clean power in a cost-effective way and reducing delivery risk associated with other types of energy infrastructure.
- 4.29. Whilst the following documents were published by the previous government, the documents are consistent with the ambitions and targets of the Clean Power 2030: Action Plan and, therefore, remain relevant as material considerations in respect of the Proposed Development.

British Energy Security Strategy (April 2022)

- 4.30. In April 2022 the UK Government released the updated policy paper: British Energy Security Strategy. Although this paper was published under the former Government, as stated above, these policies remain consistent with the new Government as set out in Clean Power 2030. The British Energy Security Strategy sets out the need, in accordance with the net zero strategy, to move towards the UK electricity being powered by low-carbon sources by 2035.

This added urgency was made due to the unpredictable market of international energy and Britain's need to move towards self-reliance in the energy sector.

- 4.31. The paper identifies a timeline for a variety of renewable resources, including *"encouraging all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment"*.
- 4.32. Specifically, the Government is proposing to *"consult on amending planning rules to strengthen policy in favour of development on non-protected land, whilst ensuring communities continue to have a say and environmental protections remain in place"*.
- 4.33. Further, it outlines that the Government will *"continue supporting the effective use of land by encouraging large scale projects to locate on previously developed land, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites"*.

Powering Up Britain (March 2023)

- 4.34. In March 2023, the UK Government released an updated guidance document: Powering Up Britain. This sets out a blueprint for the future of energy in the UK, bringing together the Government's Energy Security Strategy and Net Zero Growth Plan.
- 4.35. Further to the goal set out in the Net Zero Growth Plan, the Government now the ambition ***"to fully decarbonise the power system by 2035"***. In order to do so it is explained that ***"moving to a power system that relies primarily on low carbon technologies is a crucial step towards delivering, cheaper, cleaner, domestic energy and addressing our underlying vulnerability to international fossil fuel prices"***.

Energy Generation in Wales 2022 (October 2023)

- 4.36. The Energy Generation in Wales 2022 report provides the most up-to-date reflection of Wales energy generation which is used to measure progress against renewable energy generation targets. This progressing towards targets as, *"The Welsh Government has a target for Wales to meet the equivalent of 70% of its annual electricity consumption from Welsh renewable electricity generation by 2030, and 100% by 2035"*.

UK Battery Strategy (November 2023)

- 4.37. In November 2023 the Government's Department for Business and Trade published the UK Battery Strategy. The strategy outlines the essential role that batteries will play in the UK's energy transition and the ability to achieve net zero by 2050. It also recognises the importance of BESS to national security.
- 4.38. The strategy then further outlines that *"the Government's 2030 vision is for the UK to have a globally competitive battery supply chain that supports economic prosperity and the net zero transition"*.
- 4.39. The intrinsic link between BESS and renewable energy is further emphasised as the strategy acknowledges that BESS will help the UK *"to use energy in a more flexible way that supports decarbonisation goals by helping to balance the system, maximise the useable output from renewable energy, and avoid the need for new generation capacity"*.

- 4.40. The strategy also refers to the definition of BESS as *“key to the net zero transition as they enable us to use energy more flexibly, for example, maximising the use of intermittent low carbon generation”*.

National Grid’s Future Energy Scenarios (July 2024)

- 4.41. In July 2024, National Grid ESO published an updated Future Energy Scenarios (FES) Report, following from their previous publication in July 2023. The report underscores the escalating urgency for strategic decisions to meet the UK’s ambitious climate goals.
- 4.42. In the previous FES Report (2023), four future energy scenarios were presented, however, the revised report sets out three distinct pathways, all of which achieve the decarbonisation goals. This is a key change, as all pathways meet the sixth carbon budget and net zero emissions by 2050, which was not the case in the 2023 report. Two key messages that were derived from the updated report was the UK’s need to expedite the deployment of renewable technologies alongside the significant increase in renewable energy capacity required to hit the 2050 goals. The overall conclusion of the report was that decisive action is needed within the next two years, in order to meet the climate emissions goals.

Local Energy Policy

Rhondda Cynon Taf County Borough Council – Making Rhondda Cynon Taf Carbon Neutral by 2030 (June 2022)

- 4.43. RCTCB Council published their strategy to make the Council Carbon Neutral by 2030 which includes a commitment that the *“County Borough will be as close to carbon neutral as possible”* by 2030.

Rhondda Cynon Taf Country Borough Council – Decarbonisation Strategy (2023–2025)

- 4.44. RCTCB Council published their Decarbonisation Strategy in March 2023 in which set out their commitment to becoming a Carbon Neutral Council by 2030. It also states as part of ‘Our Climate Plans’ on their website that the *“County Borough will be as close to carbon neutral as possible”* by 2030.

Caerphilly County Borough Council – Decarbonisation Strategy (2020)

- 4.45. CCB Council published their Decarbonisation Strategy in November 2020, committing to becoming a net zero carbon local authority by 2030. The Council also set out on their website their commitment to working towards achieving the Welsh Government target for a Net Zero Wales by 2050. It also states the Council are currently development a 2050 net zero strategy.

National Planning Policy

Planning Policy Wales (Edition 12, published February 2024)

- 4.46. The Planning Policy Wales Edition 12 (PPW, 2024) and accompanying Technical Advice Notes, Circulars and Policy Clarification Letters provide further detailed guidance on a range of issues which may affect development. These are material considerations in respect of the Proposed Development.

- 4.47. The publication of Future Wales has necessitated revisions to Planning Policy Wales to ensure that the content of the two documents are aligned. In particular, some of the policy context in Planning Policy Wales has been clarified and made more explicit to support Future Wales. Other changes to Planning Policy Wales are essentially factual, reflecting updates to legislation, policy and guidance which impact on the planning system and planning policy changes which have been made since the previous edition was published.
- 4.48. Planning Policy Wales (PPW) provides the policy framework for the effective preparation and delivery of development plans. This is supplemented by topic based Technical Advice Notes (TANs) and circulars. PPW, the TANs and the circulars are material to decisions on individual planning applications.
- 4.49. The Welsh Government's main outcomes for the planning system reflect their vision of sustainable development which means 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. Overall, this means meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.50. PPW is based on a plan approach and the presumption in favour of development proposals which accord with its key principles and the policy objectives of sustainable development (within the planning system). PPW sets out five key principles which underpin Welsh Government's approach to sustainable development; these are as follows.
- **Growing our economy in a sustainable manner** – The planning system should enable development which contributes to long term economic wellbeing, making the best use of existing infrastructure and planning for new supporting infrastructure and services.
 - **Making best use of resources** – The efficient use of resources, including land, underpins sustainable development.
 - **Creating & sustaining communities** – The planning system must work in an integrated way to maximise its contribution to well-being.
 - **Maximising environmental protection and limiting environmental impact** – Natural, historic and cultural assets must be protected, promoted, conserved and enhanced.
- 4.51. Section 3 of PPW sets out the priority for strategic and spatial choices. Paragraph 3.1 considers that *“Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another.”*
- 4.52. With regards to 'Best and Most Versatile Land', Paragraph 3.59 sets out that: *“When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.”*

- 4.53. In respect of 'Development in the Countryside', Paragraph 3.60 sets out that *"...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area."*
- 4.54. Paragraph 3.61 under the heading of 'Supporting Infrastructure' identifies how adequate and efficient infrastructure such as electricity is critical for economic, social and environmental sustainability. Paragraph 3.63 goes on to state: *"Development should be located so that it can be well serviced by existing or planned infrastructure. In general, this will involve maximising the use of existing infrastructure or considering how the provision of infrastructure can be effectively co-ordinated to support development plans. Infrastructure choices should support decarbonisation, socially and economically connected places..."*
- 4.55. Section 5 sets out the economic components of placemaking and the vision of achieving productive and enterprising placemaking and well-being. The Welsh Government outcomes for productivity and enterprise include, but are not limited to, reduces overall pollution, resilient and adaptive to climate change and embraces smart and innovative technologies
- 4.56. Page 76 of PPW identifies how places which are productive and enterprising contributes to the seven goals of the Well-being of Future Generations (Wales) Act 2015. This includes the following goals which are most relevant to the proposals:
- 4.57. *"A **Prosperous Wales** can be achieved through increased economic activity across all sectors and at all scales. This is realised through the availability of employment land, lifelong learning and training opportunities, reliable communication networks and investment in renewable and low carbon energy sources. Resource efficient choices are promoted which have financial benefits both now and over the lifetime of development."*
- 4.58. *"A **Resilient Wales** is supported by our agriculture and tourism industries and through the beauty of our natural, built and historic environment. Tourism development, which can finance preservation activities, needs careful management to ensure continued enjoyment by future generations. Sustainable agricultural practices can also assist in nature conservation and enhancement. Wales' topography also lends itself to renewable energy generation."*
- 4.59. *"A **Healthier Wales** can be achieved through the 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."*
- 4.60. *"Above all, a **Globally Responsible Wales** is promoted by reducing our carbon footprint through integrated public transportation infrastructure, encouraging globally responsible business and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised."*
- 4.61. *"Development proposals should look to the **long term** to consider how they can be flexible to adapt to future employment needs and practices, including responding to relevant future trends, the decarbonisation of our energy system, how people will move around or communicate in the future and safeguard the resources which may be needed by future generations."*

- 4.62. *"Development should **prevent** problems from occurring or getting worse such as the generation of carbon emissions, poor air quality and waste and the depletion of our natural resources which will need to be managed for many years to come".*
- 4.63. Page 77 of PPW sets out the Welsh Government trends and issues in the productive and enterprising places, these include:
- *"embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, decentralised renewable energy systems, the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks";*
 - *"supporting and enabling training, education, infrastructure, construction and manufacturing capacity to support progress towards a circular economy"; and*
 - *"supporting and enabling training, education, infrastructure, construction and manufacturing capacity to support progress towards a circular economy".*
- 4.64. Subsection 5.4 on 'Economic Development' includes Paragraph 5.4.2 which recognises that: *"The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy."*
- 4.65. Subsection 5.7 specifically relates to 'Energy'. Paragraph 5.7.2 identifies that the overall power demand is expected to increase and, in order to meet future demand, significant investment will be needed in energy generation, transmission and distribution infrastructure. It is recognised that *"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. Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales"*.
- 4.66. Paragraph 5.7.3 establishes how the planning system plays a key role in delivering clean growth and the decarbonising of energy, as well as being crucial in building resilience to the impacts of climate change.
- 4.67. Paragraph 5.7.6 identifies how *"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"*.
- 4.68. Paragraph 5.7.7 goes on to state how the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change is of 'paramount importance' to the Welsh Government. This includes that the planning system should, amongst other factors, 'optimise energy storage'.
- 4.69. Further, Paragraph 5.7.12 details that ***"Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can help balance supply and demand. Proposals for new storage facilities should be supported wherever possible"***.

- 4.70. Renewable energy targets are discussed at paragraph 5.7.14 of PPW, the Welsh Assembly will seek that: –
- for Wales to generate 70% of its electricity consumption from renewable energy by 2030; and
 - for one Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030.

- 4.71. Subsection 5.9 provides support for renewable and low carbon development. Paragraph 5.9.1 states *“Local authorities should facilitate all forms of renewable and low carbon energy development. In doing so, planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved”*. Paragraph 5.9.14 sets out how ***“Planning authorities should support and guide renewable and low carbon energy development to ensure their area’s potential is maximised. Planning authorities should assess the opportunities for renewable and low carbon energy in the area, and use this evidence to establish spatial policies in their development plan which identify the most appropriate locations for development”***. Paragraph 5.9.15 goes on to identify how outside identified areas, ***“planning applications for renewable and low carbon energy developments should be determined based on the merits of the individual proposal. The local need for a particular scheme is not a material consideration, as energy generation is of national significance and there is a recognised need to optimise renewable and low carbon energy generation. Planning authorities should seek to ensure their area’s renewable and low carbon energy potential is achieved and have policies with the criteria against which planning applications outside of identified areas will be determined”***.

National Policy Statements (NPS) for Energy

Overarching National Policy Statement for Energy (EN-1)

- 4.72. Whilst the proposed development is not NSIP development, paragraph 1.2.1 of EN-1 states that this NPS *“may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)”* albeit whether the policies are material and to what extent, is to be judged on a case-by-case basis (paragraph 1.2.2).
- 4.73. EN-1 also recognises that to meet the national target of net zero by 2050, a step change in the decarbonisation of the UK’s energy system will be required, which *“necessitates a significant amount of new energy infrastructure”* (paragraph 2.3.3 and 2.3.4). Paragraph 2.3.4 acknowledges that this includes infrastructure to store energy.
- 4.74. The *“need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses”* is emphasised in paragraph 2.3.6 which includes developing the industry and infrastructure to store energy.
- 4.75. Within paragraph 3.3.4 of EN-1, storage is acknowledged as a type of electricity infrastructure that is required to deliver the UK’s energy objectives. Paragraph 3.3.5 highlights that new storage provides increased flexibility to reduce costs in support of an affordable supply. The importance of storage to provide flexibility is also elaborated in paragraph 3.3.6 which states:

“Storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply. This means that the total amount of generating plant capacity required to meet peak demand is reduced, bringing significant system savings alongside demand side response (up to £12bn per year by 2050). Storage can also reduce the need for new network infrastructure.”

The role of electricity storage

- 4.76. Paragraphs 3.3.25 – 3.3.28 summarise the role and benefits that electricity storage has in achieving the Government's target of net zero by 2050, which include:
- Providing flexibility to the energy system, allowing the integration of high volumes of low carbon power, heat and transport;
 - Reducing the costs of the electricity system;
 - Increasing reliability of the energy system *“by storing surplus electricity in times of low demand to provide electricity when demand is higher”*;
 - *“Maximising the useable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system”*;
 - *“Providing a range of balancing services to the National Electricity Transmission System Operator (NETSO) and Distribution Network Operators (DNOs) to help operate the system”*; and
 - *“Reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.”*

Emerging Strategic Development Plan

- 4.77. The Cardiff Capital Region is in the process of preparing the Strategic Development Plan for the South East region of Wales, including RCTCB Council and CCB Council, in which the Site falls within.
- 4.78. The Plan is in the early stages of preparation with the draft Delivery Agreement consultation period having closed for comments on the 28 January 2025. The draft Delivery Agreement details the goal of responding to the climate challenge, including through energy security, and the aim to incorporate the principles of the Energy Hierarchy as set out in the PPW.

Emerging Local Plan Policies

Rhondda Cynon Taf County Borough Council

- 4.79. The RCTCB Council are currently preparing a Revised LDP 2022–2037, discussed further later in this Section. The Preferred Strategy stage of the Revised LDP was consulted on between 21 February 2024 and 17 April 2024, in addition to the RCTCB Council undertaking consultation on the Candidate Site Register.

- 4.80. The Preferred Strategy identifies that further sustainable and appropriate renewable energy development schemes are needed, including increasing the production and supply of renewable energy, and where possible, reducing carbon generating energy consumption. The importance of supporting renewable energy schemes is identified in strategic policy SP1 'Climate Change and Carbon'.

Caerphilly County Borough Council

- 4.81. In respect of CCB Council, the Development Plan constitutes the LDP up to 2021 (adopted 23 November 2010). Similarly, CCB Council are currently preparing a 2nd Replacement LDP 2020–2035 (2RLDP). The Preferred Strategy is currently being consulted on between 15 January 2025 and 26 February 2025. CCB Council are currently undertaking a third call for Candidate Sites, as part of the consultation on the Preferred Strategy, with submissions due by 26 February 2025. The Council's Review Report (published 1 June 2021) references the potential opportunities for renewable energy development to come forward across the County Borough.

Supplementary Planning Guidance

- 4.82. There are a number of Supplementary Planning Guidance (SPG) documents which are a material consideration in the assessment and determination of the Proposed Development. These relevant SPGs are discussed below.

Rhondda Cynon Taf County Borough Council

Supplementary Planning Guidance: Nature Conservation (March 2011)

- 4.83. The Nature Conservation SPG provides additional guidance regarding biodiversity, soil and earth science features. This includes guidance in relation to the relevant LDP Policy AW8 regarding protected sites and species, in addition to habitats and species of principal importance and ecological surveys. The SPG does not provide specific guidance in relation to BESS proposals, however, it acknowledges that all larger developments should achieve net benefit for biodiversity and integrate nature conservation within the design, including the enhancement, creation or restoration of locally distinctive natural habitats, enhancement measures for species, sustainable management, Sustainable Urban Drainage Systems (SuDS) and ecological connectivity.

Caerphilly County Borough Council

Supplementary Planning Guidance LDP 4 – Trees and Development (January 2017)

- 4.84. The Trees and Development SPG sets out the development should be designed to ensure trees on-site are retained where possible, in addition to space safeguarded to allow both existing and newly planting trees can establish and mature. The SPG sets out specific survey requirements and design considerations for sites containing trees, woodlands and hedgerows. This includes details regarding replacement planting as part of the mitigation and compensatory provisions under LDP Policy CW6.

5. Site Identification

- 5.1. The opportunities to deliver BESS developments for the import and export electricity into the National Grid from renewable sources are scarce, due to there being limited locations where there are points of connection (POC) with capacity to connect.. It is critical that the opportunity to develop this BESS proposal is taken, in order to meet national and local policy targets.
- 5.2. A viable grid connection with capacity is essential and instrumental in the siting of a BESS development. The POC for the Proposed Development is the Cilfynydd 400kV Substation which is included within the red line boundary of the Site. Therefore, the Site has been chosen to deliver the Proposed Development due to its proximity to the POC (approximately 440m at its closest point to the northern development parcel) to ensure a viable cable route and limited environmental disruption.
- 5.3. The Site has then been chosen for the Proposed Development due to its availability for lease, proximity to the POC and environmental suitability.
- 5.4. In terms of availability, the Site benefits from a willing landowner who can diversify his farming practices and provide the land required for the Proposed Development.
- 5.5. In relation to the suitability of the Site, the Site there are constraints and opportunities which are set out below and also explored in greater depth within the Planning Assessment Section of this Statement:
- It is not located in proximity to a built-up area;
 - There are no Public Rights of Way passing through or adjacent to the Site;
 - The Site does not comprise Best and Most Versatile agricultural land;
 - There are no designated heritage assets on or within close proximity of the Site; and
 - The development parcels (Parcel 1 and 2) and the majority of the Site is located within an area at the lowest risk of flooding.
 - The Site also benefits from an existing access to the northern parcel which will be utilised for access to the development.
- 5.6. Whilst the Site is located in the 'Taff Vale Eastern Slopes' Special Landscape Area (SLA) extensive landscaping is proposed (shown on the accompanying Landscape Masterplan) to provide robust screening and mitigation to the Proposed Development and enhance existing boundary planting. As a result of the sloping topography on the Site, a tiered approach to create development platforms has also been proposed to the earthworks to allow the retention of existing landscaping whilst also introducing new landscaping.
- 5.7. The Site intersects Craig-Evan Leyshon Common SINC however this is a small part of the Site where the access track is located and as such, as set out in the accompanying Ecological Assessment Report, it is considered the Proposed Development would not negatively affect any of the criteria for which the SINC is designated. All other non-

statutory designated sites for nature conservation are located over 400m from the Site and as such are considered sufficiently distanced that no impacts could occur.

- 5.8. As such, as a result of the available grid connection, limited constraints and opportunities, the Site has been identified as appropriate and suitable for the Proposed Development.
- 5.9. With regards to the scale of the proposal, the scale and amount of the development proposed is appropriate to deliver approximately 200MW capacity BESS development of which the Cilfynydd 400kV Substation has capacity for. The scale of the proposed development will maximise the capacity of the connection, of which opportunities for connection are scarce.
- 5.10. The Site has capacity to accommodate the development needed in order to maximise the grid capacity, given the limited impacts as a result of the proposals and also sufficient area on the Site to provide mitigation. Given the appropriate mitigation proposed and the significant benefits that the proposal can deliver on the Site as a result of the Site characteristics and opportunities, in addition to the constraints on the Site, it is considered that the Site is suitable for the Proposed Development.

6. Design and Access

- 6.1. This section of the Planning Statement provides details of the design and access of the Proposed Development and has been prepared in accordance with The Town and Country Planning (Development Procedure) (Wales) Order 2012 ('the DMPO') which sets out the requirement for certain planning applications to be accompanied by a Design and Access Statement. This is also as per the required supporting documentation requested in the initial pre-application response from February 2023 (ref: 22/5126/41).
- 6.2. In accordance with the requirements of the DMPO, the purpose of this Section is to explain the design principles and concepts, which have been applied to the Proposed Development and to explain how issues relating to access to the development have been dealt with.
- 6.3. This Statement follows the detailed list of requirements of the DMPO, which states that a Design and Access Statement must:
- (a) explain the design principles and concepts that have been applied to the development;***
 - (b) demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;***
 - (c) explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and***
 - (d) explain how any specific issues, which might affect access to the development have been addressed.***

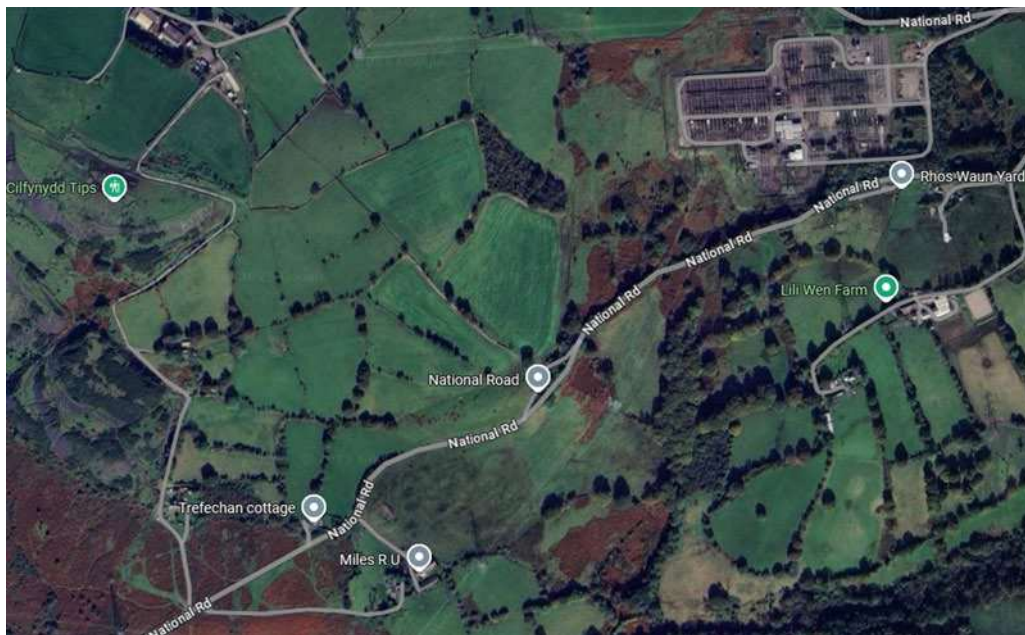
Design

- 6.4. The following section sets out the design approach taken for the Proposed Development as well as explaining the proposed access to the Site.

About the Site and Context Appraisal

- 6.5. The Site comprises grass fields extending over a number of field parcels (which are discussed in terms of three parcels for ease of reference, as outlined in Figure 2.2).
- 6.6. Parcel 1 comprises a number of irregular shaped agricultural fields with a few sparsely located trees along the field boundaries. Trees also provide separation between the parcel and a property located just south of the Site. The topography of the parcel slopes from north to south. Parcel 2 comprises grassland and is bound by National Road to the north of the Site with sloping topography north to south. Parcel 3 is formed of irregular shaped arable and grassland fields as well as the existing Cilfynydd 400kV Substation. A triangular area of woodland is located within the central area of Parcel 3. An aerial image of the Site is shown in Figure 7.1 below.

Figure 6.1 – Aerial Image of the Site



- 6.7. In terms of the Site surroundings, intermittent trees and hedgerows border the Site boundaries. National Road intersects the Site to the north of Parcel 2/south of Parcel 3. Beyond the Site to the north, east, south and west and in the wider surroundings are undeveloped grass fields. National Road lies to the north and south of Parcel 3 and south of Parcel 2. The existing access, proposed for access to the northern development parcel of the Site, is located adjacent to a small number of residential properties to the east. Nant Cae-Dudwg watercourse is approximately 300m to the south of Parcel 2. Garth-Fawr is situated approximately 350m north of the proposed BESS equipment (Parcel 1). Parcel 2 is located approximately 50m north-east of a small farm and associated farm buildings and 150m west of Trefechan Cottage, which are the nearest residential receptors. Pylons and overhead lines are located and visible in the surrounding area, which connect into Cilfynydd Substation.
- 6.8. The Site is located within the Taff Vale Eastern Slopes Special Landscape Area (SLA) and is situated within an area of Sandstone Resource/Safeguarding Area, as set out within both RCTCB Council and Caerphilly Council Development Plans.
- 6.9. A small part of the Site to the very west is located within Craig-Evan Leyshon Site of Importance for Nature Conservation (SINC). The Site is also located immediately adjacent to the Cilfynydd Coal Tips 'Regionally Important Geodiversity Site'.
- 6.10. A **Landscape and Visual Impact Assessment (LVIA)** accompanies the application, which assesses the existing landscape and visual baseline environments, in addition to the key landscape and visual related aspects of the proposed development. This assessment includes analysis of the landscape and visual baseline effects, the outcomes of which have informed the design of the development proposals.
- 6.11. Other key site characteristics are detailed below:
 - The Site benefits from an existing access which will be used for access into the northern development parcel;

- The southern development parcel is bound by National Road which can be used for access;
- The development parcels (Parcel 1 and 2) and the majority of the Site is located within an area at the lowest risk of flooding;
- Intermittent trees and hedgerows are largely present across the Site boundaries and bordering the field parcels comprising the Site;
- There are no Listed Buildings or Conservation Areas on the Site or in close proximity to the Site;
- There are no Public Rights of Way passing through the Site with the nearest routes remaining unaffected by the Proposed Development; and
- The Site does not comprise Best and Most Versatile agricultural land.

Design Approach

- 6.12. The approach to the design of the proposals has taken into account the Site characteristics, constraints and as a result of the rural location of the Site within a Special Landscape Area and the topography of the Site, the design approach has been to ensure the proposed development is landscape-led.
- 6.13. The approach to the scheme design is as follows:
- The proposed BESS units and associated infrastructure to Parcel 1 have been positioned to address changes in topography and allow sufficient spacing to incorporate earthworks embankments and retaining walls that can be assimilated into the landscape;
 - The positioning of the development platforms to Parcel 1 are proposed in a tiered approach using cut and fill to reduce the degree of engineering works so that the proposed development would nestle into the slope;
 - The Proposed Development within Parcel 1 has also been sited to ensure the retention of the majority of tree cover along field boundaries and provide sufficient spacing for proposed landscaping;
 - The Proposed Development has been positioned and designed to be compliant with the National Fire Chiefs Council (NFCC) Grid Scale Battery Energy Storage System Planning – Guidance for FRS;
 - The existing access track into Parcel 1 is to be utilised and proposed for access into this development parcel;
 - The proposed substation to Parcel 2 has been located as closely to National Road as possible whilst allowing sufficient spacing around the platform to ensure sufficient landscaping can be provided;
 - The Proposed Development within Parcel 2 has been contained to a single development platform and kept as compact as possible; and

- The proposed underground cable route is to be sited within a cable corridor to minimise environmental impacts.

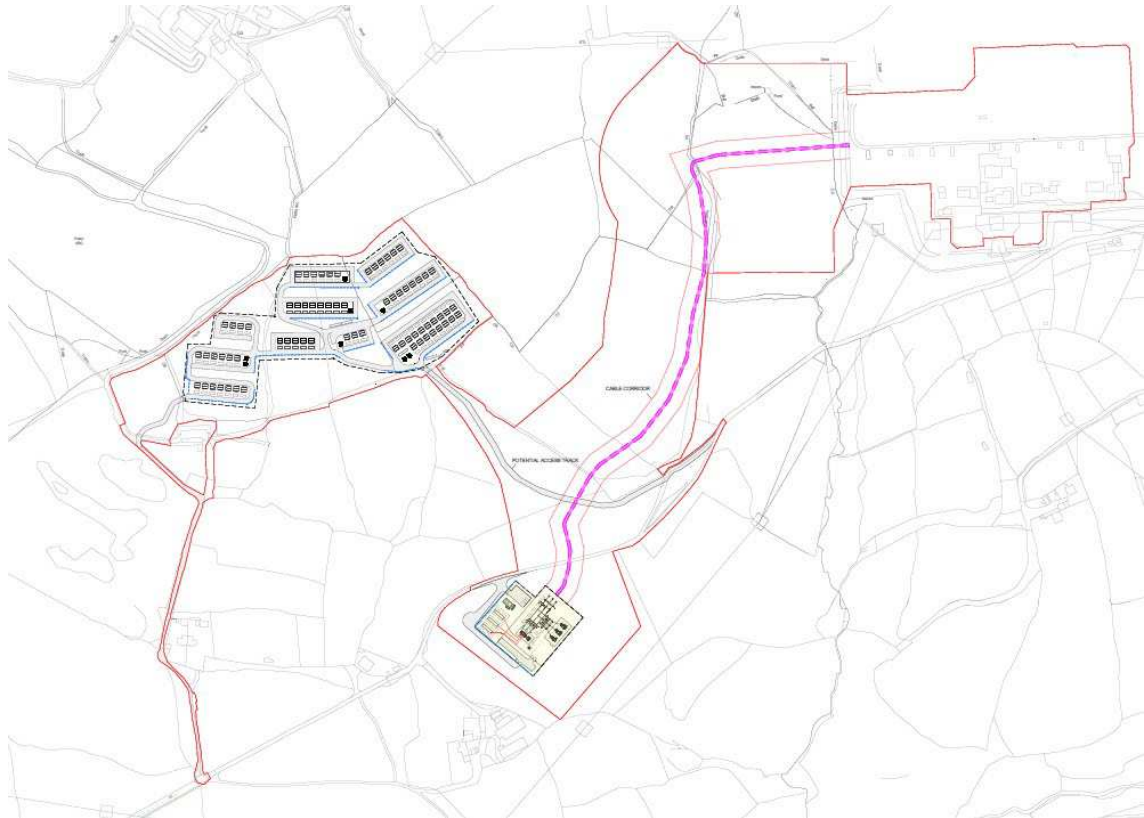
Design Development

- 6.14. The Proposed Development has been subject to extensive design development to reflect the constraints and opportunities of the Site. The proposed scheme has been influenced by technical assessment and has undergone an iterative design process, designed to be landscape-led with mitigation measures embedded into the design, taking into consideration the designation of the Special Landscape Area and the topography of the Site and surrounding area.
- 6.15. As a result of this, the proposed BESS units and associated infrastructure are proposed to be located in Parcel 1 only and only the substation proposed in Parcel 2. Through several design iterations, the Proposed Development has been significantly reduced in scale to ensure the BESS and associated infrastructure is confined to Parcel 1 with a reduction in the amount of built development proposed to address the topography of the Site and allow for landscaping enhancements across the Site and amongst the development platforms. Parcel 2 now only comprises the proposed on-site substation which also reduces the amount of built development proposed from previous design iterations as well as increasing the area proposed for biodiversity enhancement and screening.
- 6.16. Parcel 3 facilitates the delivery of the proposed cable route to the POC, in addition to providing the proposed access route. As such, the built development is largely confined to Parcel 1 and 2, with BESS units being located within one portion of the Site. The red line boundary was subsequently reduced in accordance with these changes. The cable route has also been refined through surveys on the Site so that it can be routed to limit any environmental impacts.

Design Proposals and Policy Compliance

- 6.17. The Proposed Development would locate the BESS equipment and substation within the logical footprint of agricultural field parcels. The BESS development is situated to the north of the existing access track. The developable area is also positioned to minimise views from nearby residential receptors and reduce impact on existing trees and hedgerows. The Proposed Development has been designed to mitigate noise impacts with the incorporation of proposed acoustic fencing and suitable distance between the Proposed Development and the nearby properties.
- 6.18. The Proposed Development will connect to the existing Cilfynydd 400kV Substation, which is encompassed within Parcel 3, to allow for the connection to the National Grid. It has the availability of the point of connection and the suitability and availability of the Site which has resulted in the siting of the BESS on the Site. This has been discussed in detail in Section 5.
- 6.19. The design of the scheme is provided within the accompanying planning drawings and has resulted from technical and environmental considerations. The final layout can be found below in Figure 6.2.

Figure 6.2 – Final Layout



- 6.20. There has been particular attention given to ensure the design is a landscape-led scheme which locates the proposal in the most suitable development envelope on the Site. This includes consideration for the topography of the Site, maximising the benefits of existing landscaping, and providing visual screening and mitigation through new landscaping to minimise landscape and visual impact as a result of the Proposed Development. The Landscape Masterplan, depicted in Figure 6.3 below, provides a landscape strategy for the Proposed Development that reflects and respects the local landscape character, and would assimilate the proposals in views overtime.

Figure 6.3 – Landscape Masterplan



6.21. Design considerations and features of the Proposed Development which are relevant to minimising the landscape and visual effects include:

- The retention of the majority of tree cover which defines the mature landscape framework, including historic field boundaries and structures;
- Proposed supplementary vegetation around the BESS development (northern parcels on upper slopes) which will include multiple layers of hedgerow and tree planting suitable for the exposed location to provide screening and seek to mitigate views from surrounding locations;
- The Substation (southern parcel on lower slopes) will combine dense tree belts and hedgerows around its perimeter to screen the development from neighbouring properties and assist with the integration into the wooded valley landscape further south. Scattered native trees, typical of the valley floor landscape, will also offer filtering effects from the surrounding area;
- The tiered approach to the earthworks proposed for the development platforms, using cut and fill to reduce the degree of engineering works, will allow the proposed development to nestle into the slope;
- Slopes will be planted with trees to assimilate the banks into the landscape and incorporate screening effects which will improve over time upon establishment;

- Where retaining walls are required, these will reflect the local natural stone which is present in the surrounding landscape;
- Matching the RAL colours of the individual elements of the development, including the boundary and acoustic fencing, to the surrounding landscape to further minimise the visual appearance of the development; and
- The proposals set out in the Landscape Masterplan discussed below.

- 6.22. The proposed landscape strategy takes into consideration the arboricultural, ecology and drainage matters on the Site. The proposed landscaping ensures the biodiversity value of the Site would be enhanced therefore, environmental benefits would be generated as a result of the Proposed Development, in addition to utilising the existing access track to the Site.
- 6.23. The proposed landscaping includes the implementation of new tree planting and hedgerows to reinforce the boundaries of the Site and minimise impacts, alongside the management and enhancement of existing field boundary vegetation. This includes proposed native hedgerow and trees along the north-east site boundary of Parcel 1 to mitigate views of the proposed BESS equipment. The enhancement of existing boundary vegetation with new hedgerow planting would enhance the screening value further. In addition, proposed tree belt planting within Parcel 1 is proposed towards the south of the proposed BESS equipment to provide screening from views from the south looking north towards Parcel 1.
- 6.24. In respect of Parcel 2, tree belt planting is proposed to enhance screening value around the proposed substation to mitigate views looking eastwards from the nearby residential receptors towards the west. As such, the proposed landscaping would provide additional filtering and screening to walkers and residents' views, whilst enhancing existing landscaping and increasing the biodiversity value of the Site.
- 6.25. As a result on the negligible impact, if any, of the underground cable route to Cilfynydd Substation, no additional landscaping is proposed or required to the field parcel where the buried cables are proposed.
- 6.26. A surface water drainage strategy has been prepared to manage surface water runoff from the Proposed Development. The proposed strategy will ensure surface water runoff rates from the Site do not increase as a result of the proposed development and therefore also ensure that associated surface water flood risk also does not increase. The proposed substation will be managed with geo-cellular crates outfalling into a local Ordinary Watercourse at a restricted rate. To maintain current surface water flow patterns on the Site and in the local area, surface water runoff from the proposed BESS will outfall at the southern end of the Site via a series of gravel trenches. The proposed surface water drainage strategy has been designed to manage all storm events up to and including the 1 in 100 year plus an allowance for climate change. The drainage strategy has also been designed to account for the provision and containment of fire water.
- 6.27. The Proposed Development will deliver a net benefit to nature and a Biodiversity Management Plan has been prepared to outline the biodiversity protection and enhancement measures for the Proposed Development
- 6.28. To mitigate any noise impact on the few residential receptors near the Site, acoustic fencing is proposed to be sited closely to the proposed infrastructure to Parcel 1 and 2.

- 6.29. The measures as outlined above contribute to a carefully designed scheme that seeks to mitigate impacts and reflects the surrounding landscape character. As such, the Proposed Development is considered compliant with the relevant local and national planning policies relating to design including Policy AW6 of the RCTCB Council LDP and Policy SP6 of the CCB Council LDP, as outlined in the Assessment Section of this Planning Statement.

Access

- 6.30. The Site incorporates and is bound by National Road to the north of Parcel 2 and the south of Parcel 3. Parcel 1 is served by an existing access track which connects the parcel to National Road.
- 6.31. The application is supported by the submitted Construction Traffic Management Plan (CTMP) and Transport Statement which outlines that the proposed access for construction and operational use will be taken via the existing access track from National Road to Parcel 1 and from a proposed access from the south of National Road to Parcel 2. A potential secondary access is proposed to Parcel 1 for emergency vehicular access only.
- 6.32. The CTMP demonstrates that the impact of the proposals during the construction period will be effectively managed and mitigated where required.
- 6.33. The proposed access arrangements are considered suitable to accommodate the construction and operational related trips associated with the proposed development.
- 6.34. The drawings that accompany the CTMP and TS illustrate the visibility splays at each site access and demonstrate that the proposed site accesses on National Road achieve sufficient visibility for construction and operational vehicles to utilise in a safe manner.
- 6.35. Swept path analysis for a 16.5m length HGV has been undertaken which shows that turning into and out of the accesses to / from National Road is achievable in a safe and suitable manner. Swept path analysis of the secondary/emergency access for a 7.7m Fire Tender vehicle has also been demonstrated.
- 6.36. In respect of the above, it is considered that the Proposed Development accords with Policy AW5 of the RCTCB Council LDP and Policy CW1 and CW2 of the CCB Council LDP.

7. Planning Assessment

7.1. The purpose of the Planning Assessment is to consider the proposal against the policies within the Development Plan and other material considerations to demonstrate that the proposal is acceptable in planning terms. The Planning Assessment in this Section considers all the key considerations thematically and is set out as follows:

- Principle and Need of Development:
 - National Policy Considerations; and
 - Local Policy Considerations.
- Other relevant matters including:
 - Location;
 - Design;
 - Landscape and Visual Impact;
 - Ecology;
 - Noise;
 - Fire Safety;
 - Heritage and Archaeology;
 - Arboriculture;
 - Transport and Access;
 - Flood Risk and Drainage;
 - Agricultural Land;
 - Mineral Safeguarding.
 - Economic Benefits; and
 - Sustainable Development.
- Planning Balance.

Principle and Need of Development

7.2. The following paragraphs consider the national and local policy considerations in relation to the principle and need of the development, particularly with regards to the decarbonising the energy sector, working towards Net Zero and reducing the impacts of climate change.

National Policy Considerations

- 7.3. In respect of the principle and need for the development, the Proposed Development offers the opportunity to secure battery storage with a capacity of approximately 200MW. As evidenced within the ambitions and targets as outlined in The Clean Power 2030 Action Plan and other national energy policy documents referenced in Section 4, there is an urgent and compelling need for this type of development and very strong policy support for the move to Net Zero. The increasing dependence on renewable energy and, in particular wind and solar energy, has led to there being fluctuations in supply of energy depending on the weather, hence the increased need for storage facilities. These facilities store excess energy at times of high renewable generation and provide storage to export energy when demands are high and generation output is low.
- 7.4. Whilst BESS proposals are a more recent technology, it has been recognised in various recent planning decisions that these proposals have 'substantial' and 'significant' benefits and Inspectors have recognised the increased need for battery storage, giving them very significant weight within recent appeal decisions. There can be no doubt that there is a clear need for BESS development and the vital contribution it will make to maximising the release and storage of renewable energy generation.
- 7.5. The COP30 Conference is due to convene in November 2025, which demonstrates the importance of international co-operation to address the threats of climate change in order to make important progress on mitigating climate-related issues. The latest COP29 Conference, held in November 2024, saw Prime Minister Keir Starmer announce that '*climate action is at the heart of this government's mission*' and the importance of driving the green energy transition. The Prime Minister also set the UK's 2035 international target, a nationally determined contribution to reduce all greenhouse gas emissions by at least 81% on 1990 levels.
- 7.6. Whilst the proposal is not an NSIP, it is identified as critical national infrastructure and Paragraph 1.2.1 of NPS for Energy, EN-1, highlights that the NPS can be a material consideration for planning applications determined under the Town and Country Planning Act 1990 (amended). The revised NPS establishes the need for battery storage in providing flexibility and meaning that less energy is wasted when there is excess production, therefore, bringing significant savings and reducing the need for new network infrastructure.
- 7.7. The Welsh assembly recognises this, with both Future Wales and the PPW aiming for Wales to have 70% of its electricity consumption from renewable energy sources by 2030. The published Energy Generation in Wales by the Welsh Government sets out revised adopted energy targets for 2035, including the generation of the equivalent of 100% of Wales' annual electricity consumption from renewable sources by 2035.
- 7.8. Future Wales places '*urgent action*' on dealing with the challenges of climate change and achieving a sustainable decarbonised society. The provision of renewable energy is clearly embedded in this future direction, with Policy 17 setting out strong support for '*renewable and low carbon energy from all technologies and at all scales*'. The Plan places '*significant weight*' on meeting Wales' international commitments and their target to generate 70% of consumed electricity by renewable means by 2030. The Plan also specifically refers to wishing to see energy storage play a role in supporting the South East economy.
- 7.9. The PPW specifically emphasises the need for energy storage to help balance the supply and demand of energy generation from renewable sources. It states that new storage facilities

should be supported wherever possible, including through the optimisation of energy storage. The PPW clearly states the important role of the planning system to deliver clean growth, decarbonise the energy sector and build resilience to the impacts of climate change. This is of '*paramount importance*' to the Welsh Government. The PPW details that planning authorities should support renewable energy development and that there should be a presumption in favour of development in identified areas, including acceptance of landscape change. Further, the PPW sets out that outside identified areas, renewable energy proposals should be determined based on the merits of the individual proposal and due to energy generation being of national significance, local need is not a material consideration.

- 7.10. In light of the above, the principle and need for BESS developments and their vital contribution to maximising the storage and release of renewable energy generation is evident. The Proposed Development will contribute to facilitating a faster transition to meeting national targets, including the 70% electricity generation target by 2030 in Wales, alongside meeting Net Zero and as such, the proposed development can be considered to address national policy including Policy 17 of Future Wales.

Local Policy Considerations

- 7.11. On a local scale, both RCTCB Council and CCB Council have established a Decarbonisation Strategy and have set out their commitments to working towards Net Zero and mitigating the impacts of climate change, including becoming as close to carbon neutral as possible by 2030 across the County Borough.
- 7.12. The increasing need for renewable energy development is established within the RCTCB Council LDP. Policy AW12, 'Renewable & Non-Renewable Energy' sets out support for development proposals which promote the provision of renewable (and non-renewable) energy where it can be demonstrated that there is no unacceptable effect upon the interests of the listed criteria. As set out further within this section of this document, the Proposed Development will not result in unacceptable impacts and, therefore, the proposal is in accordance with these aspects of Policy AW12 of the LDP.
- 7.13. The CCB Council LDP does not include a specific policy that relates to the provision of renewable energy development, however, Paragraph 1.54 of the LDP does state that energy conservation makes a positive contribution to the protection of the environment and that renewable energy technologies have an important role to play in the built environment. BESS proposals have a role in preserving the energy generated from renewable energy sources, when there is a surplus, so it can be used when demand arises. The Paragraph also states that the benefits of renewable energy schemes need to be balanced against the potential impact of such developments.
- 7.14. In conclusion, the principle and need for development is clearly acceptable and widely supported by policy. There is a need for renewable and low carbon energy development on both a national and a local scale. The Proposed Development contributes to achieving ambitious renewable energy generation and Net Zero targets, and ensuring improvements to energy resilience.

Other Relevant Matters

- 7.15. The following themes are considered below in relation to the applicable planning policy context.

Location

7.16. The relevant policies in relation to Location within the Development Plan include:

RCTCB Council LDP

- Policy AW2 Sustainable Locations.

CCB Council LDP

- Policy SP2 Development Strategy – Development in the Northern Connections Corridor;
- Policy SP5 Settlement Boundaries;
- Policy CW15 General Locational Constraints; and
- Policy CW19 Locational Constraints – Rural Development and Diversification.

7.17. Section 5 of this Statement identifies the Site Identification which details a number of considerations for selecting the Site, including the availability of the POC, the close proximity of the Site to the POC, and the availability and suitability of the land which has limited environmental constraints. Following this feasibility stage, further environmental and technical work took place which identified more detailed considerations. These have been taken into account as part of the design process and, where appropriate, mitigation measures have been introduced as detailed within Section 5.

7.18. Policy AW2 of the RCTCB Council LDP, states that proposals on non-allocated sites will only be supported in sustainable locations. The policy provides a number of criteria to define sustainable location as set out in **Appendix 1**. Whilst the Site falls outside of the defined settlement boundaries, it is acknowledged in the Pre-application responses (ref. 22/5126 and ref. 24/5088/PRE) that there are some exceptions to this, including proposals for renewable energy. An available grid connection is the driving factor for locating BESS developments and the available POC and proximity to Cilfynydd 400kV Substation has, therefore, resulted in the location of the Site outside of a defined settlement boundary, in order to maximise efficiency and minimise disruption from the cable route construction. Despite the location of the Site, this exception is considered acceptable as the proposal does not conflict with surrounding land uses, as set out in the accompanying technical assessments, and is well-related to the existing substation which the Site connects to. Other material considerations discussed, in particular The Clean Power 2030 Action Plan and government and local policy, overrides this position given there is a clear and urgent need for renewable energy development.

7.19. Policy SP2 of the CCB Council LDP sets out *inter alia*, the promotion of sustainable development that ‘*makes the most efficient use of the existing infrastructure*’. Policy SP5 defines settlement boundaries in order to meet a number of criteria set out in **Appendix 1**. Again the Site lies outside of a settlement boundary however as set out, the Proposed Development needs to be in close proximity to the POC which has resulted in the siting of the Proposed Development. The Proposed Development would not result in the coalescence of settlements, ribbon development or fragmented development and for the reasons set out in the assessment, it would not represent inappropriate development in the countryside.

- 7.20. Policy CW15 of the CCB Council LDP details that that outside settlement boundaries, proposals will not be permitted unless the Proposed Development is either, amongst other factors, associated with the provision of public utilities and infrastructure that cannot reasonably be located elsewhere. Policy CW19 also details that schemes will be permitted where they are consistent in scale and compatible with their rural location. The Proposed Development is associated with the provision of infrastructure that cannot reasonably be located elsewhere, due to the POC and cable route guiding the location of the development as set out in Section 5 of this Statement, with the SLAs covering the entire area around the substation and beyond. Further, the design considerations to ensure the Proposed Development assimilates with the natural environment is addressed in Section 6.
- 7.21. Whilst PPW establishes at Paragraph 3.55 that previously developed land (PDL) should, wherever possible, be used in preference to greenfield sites where it is suitable for development, PPW goes on to recognise that not all PDL is suitable for development due to variety of technical and environmental constraints. As set out in Section 5, the Site has been chosen due to its proximity to the POC, its suitability and availability with no PDL in the vicinity of the POC.
- 7.22. It is noted that the Site is located within a Sandstone Resources Area and Safeguarding Area. Both the RCTCB Council LDP and CCB Council LDP include policies in respect of mineral safeguarding under Policy SP8 and Policy CW22, respectively. This theme is discussed below.
- 7.23. In respect of the above, the Site is considered to be a sustainable location which is suitable for the type of development proposed and the Proposed Development largely accords with the definition of sustainable development in accordance with the relevant policy position above.

Design

- 7.24. The relevant policies in relation to Design within the Development Plan include:

RCTCB Council LDP

- Policy AW5 New Development; and
- Policy AW6 Design and Placemaking.

CCB Council LDP

- Policy SP6 Placemaking; and
- Policy CW2 Amenity.

- 7.25. The design of the Proposed Development has been developed over a period of time, taking into account feedback from Pre-Application response and environmental and technical constraints. The design details and the evolution of the scheme design are outlined in Section 6.
- 7.26. Policy AW5, New Development, of the RCTCB Council LDP supports development proposals where there are no unacceptable amenity impacts. Of relevance, this includes: no unacceptable impacts to character and appearance of the site and surrounding area; retention of natural environment value and existing site features where appropriate; and

designing out the opportunity for crime and anti-social behaviour. Policy AW5 also requests development proposals are accessible, which is discussed later on in this Section. Policy AW6 details a number of design considerations, including supporting development proposals which are of a high design standard; the importance of appropriate design to the local context; landscaping and planting being integral to the scheme and the design protecting and enhancing the landscape and biodiversity. Policy SP6 requires proposals to have a high standard of design, in addition to designing out crime, amongst other considerations.

- 7.27. Policy CW2 of the CCB Council LDP includes that proposals should have no unacceptable impact on the amenity of adjacent properties or land and not result in over-development.
- 7.28. It is considered that the Proposed Development is designed to a high quality. The Proposed Development is a landscape-led scheme which has been developed to minimise impact on the Site and surrounding landscape as much as possible. The proposed scale, siting and materials of the BESS, alongside the proposed landscaping and levels strategy which reflects the sloping nature of the Site, are reflective of the context and character of the surrounding natural environmental and landscape interest. As discussed, through design iteration set out in Section 6, the proposed BESS equipment has been reduced in scale to be contained within Parcel 1 only with the substation proposed to Parcel 2. The BESS units and substation are proposed to be a colour that reflects the natural and surrounding landscape, in order to assimilate the Proposed Development within the natural surroundings, and security fencing and CCTV is proposed to deter crime and anti-social behaviour. The proposed landscaping and biodiversity has been integral to the scheme and incorporates new features and the enhancement of existing landscaping to improve biodiversity and provide screening. With this in mind, it is considered that the Proposed Development demonstrates a high quality of design and, therefore, complies with the above policies.

Landscape and Visual Impact

- 7.29. The relevant policies in relation to Landscape and Visual Impact within the Development Plan include:

RCTCB Council LDP

- Policy SSA23 Special Landscape Areas; and
- Policy AW8 Protection and Enhancement of the Natural Environment.

CCB Council LDP

- Policy NH1 Special Landscape Areas (SLAs); and
- Policy SP10 Conservation of Natural Heritage.

- 7.30. The RCTCB Council LDP Policy SSA23 identifies the Taff Vale Eastern Slopes Special Landscape Area (SLA), setting out development within SLA are to conform to the highest standards of design to the character of the area. Policy AW8 details that proposals no unacceptable impact will be caused upon features of landscape importance, amongst other considerations. The CCB Council Policy NH1 identifies Mynydd Eglwysilan SLA which outlines that the area will be protected from development that would harm its distinctive features or characteristics of the SLA. Policy CW4 references that the conservation and enhancement of the features of the SLA where impacted by proposals.

- 7.31. As discussed, the high design quality of the Proposed Development is detailed in Section 6. This application is also accompanied by an LVIA and Indicative Landscape Masterplan which outlines in detail how landscaping and visual impact has been considered, including the retention and enhancement of biodiversity features.
- 7.32. The Site is currently agricultural grassland of mixed value used for grazing. The Site has a modest slope from the peaks of the Cilfynydd Tips to the north and the riverbed to the south typical of the valley landscape. This is a topographical difference of approximately 80m from the top (northern edge, 245m AOD) to the bottom (southern edge, 165m) with a relatively uniform incline with the exception of National Road which cuts through the centre.
- 7.33. The Site forms part of the Taff Vale Eastern Slopes Special Landscape Area (SLA) which is a non-statutory landscape designation covering. Mynydd Eglwysilan SLA is located to the south.
- 7.34. There are no PROWs within the Site boundary. The nearest publicly accessible land is located across the Cilfynydd Tips to the west which is Open Access Land (CRoW) which has a network of footpaths around it.
- 7.35. The Proposed Development would not have any direct physical effects upon PROWs as none are located within the Site. The proposals would introduce no change as a recreational resource due to the secure nature of the facility. This would have no effect on this landscape element.

Effects on Landscape Elements

- 7.36. In overall terms, the scheme would result in some net beneficial effects with regard to the landscape elements that currently define the landscape character of the Site. The elements that currently contribute to defining the character of the Site, namely trees, shrubbery and hedgerows at the boundaries, would all be strengthened and form more prominent elements in the medium and longer term. There would be a moderate adverse impact upon landcover and topography.

Effect on Landscape Character

- 7.37. At the Site level, with a high susceptibility, value and sensitivity combined with a high magnitude of change would result in a major adverse effect in landscape character terms. The amount of planting and landscape enhancement would be greater than what is currently existing and beneficial given the scale of the Proposed Development.
- 7.38. The Site and the surrounding area are located within the National Landscape Character Area (NLCA) 37: South Wales Valleys Apart from the loss of a small area forming a minor portion of the wider NLCA, all of the key defining characteristics would remain and prevail with the scheme in place.
- 7.39. The landscape elements that constitute the character of the LANDMAP Geological Landscape, Landscape Habitats and Cultural Landscape Aspect Areas would generally remain physically unaffected by the Proposed Development. The effects on landscape character would therefore result from the visual influence of the BESS on the LANDMAP Historic Landscape and Visual & Sensory Aspect Areas, for both of which the magnitude of change is low due to the visual screening that contains the solar development.

Effect on the Taff Vale Eastern Slopes SLA

- 7.40. The layout of the proposals has been carefully considered, new hedgerow and tree planting are proposed to minimise landscape and visual effects, in accordance with the Key Policy and Management Issues for the SLA. The number of trees and length of hedgerow proposed will be greater than those that are existing, in accordance with the strategy. The existing National Grid Cilfynydd Substation to the east, also within the SLA, provides a degree of context to the development for the area.
- 7.41. The LVIA considers that the Proposed Development would result in a low magnitude of change as the Site covers a small area of the wider SLA and the inherent qualities of the SLA would be retained and enhanced, and the Key Policy and Management Issues are incorporated into the scheme, resulting in a moderate adverse effect.

Effect on Visual Amenity

- 7.42. The Screened Zone of Theoretical Visibility (SZTV) for the Site reflects the ranging topographical surroundings and context with theoretical distant views from across the valley to the south and on the slopes in the surrounding landscape. In reality, the 'actual' visibility of the Site is less than illustrated in the SZTV as demonstrated by the fourteen representative viewpoints. The reduced extent and pattern of visibility of the Proposed Development is due to the visual containment provided by the rising topography to the north, east and west with vegetative cover.
- 7.43. Considering the intervening topography and vegetation enclosing portions of the Site, it is assessed that views from the majority of publicly accessible locations within the surrounding area would be highly restricted to the immediate periphery in the north, east and west. To the south, elevated views from the Mynydd Eglwysilan Common (Open Access Land/Other Statutory Access Land) across the valley are evident due to the Site's location on a southerly aspect.
- 7.44. The visual impact upon a localised part of the Craig-Evan-Leyshon Common adjacent to the Site would be major adverse at Year 1, typically reducing to a moderate adverse level by Year 15 (see Viewpoint 6) following the growth of mitigation planting. The visual impact on a short section of National Road which passes through the Site would be major adverse at Year 1, reducing to moderate adverse at Year 15 (see Viewpoint 2). Views from across the valley on the Mynydd Eglwysilan (see Viewpoint 10) would be moderate adverse at Year 1, reducing to negligible at Year 15 once planting has established. These are evidenced by the photomontages for these viewpoints (Figure 7) completed at Year 1 and Year 15.
- 7.45. In conclusion, the Proposed Development would have some very limited and localised visual effects which would reduce over time as mitigation matures, therefore these impacts would not result in long term unacceptable visual harm. The accompanying LVIA concludes that the Proposed Development can be effectively integrated and assimilated into the surrounding landscape with the adverse effects highly localised to the immediate environs and elevated panoramic views to the south. These are temporary with the proposed mitigation planting substantially reducing the scale of adverse effects.
- 7.46. The integrated mitigation measures, such as offset from boundaries, revised terracing for the BESS development, and substantial woodland planting around the substation assist in reducing the adverse effects and allowing the development to be integrated into the receiving environment without any undue residual harm. This would continue to improve

over time as the proposed tree planting establishes. As such, the Proposed Development is considered to be compliant with the applicable policies identified above.

- 7.47. In terms of the nearby approved developments, the approved synchronous condenser with ancillary infrastructure and associated works and a cable connection (application reference: 23/0470/FULL) is currently being built out and as such, forms part of the baseline of the landscape and visual assessment undertaken. Furthermore, whilst the approved Twyn Hywel Energy Park (application reference: DNS/3272053) is renewable energy development, due to the nature of the development, with a 28km study area and 200m height of the wind turbines, it is considered that due to the differences of the type of development and as this Proposed Development is nestled into the sloping topography, it is considered that there would be no cumulative impacts in relation to landscape impact.

Ecology

- 7.48. The relevant policies in relation to Ecology within the Development Plan include:

RCTCB Council LDP

- Policy AW8 Protection and Enhancement of the Natural Environment.

CCB Council LDP

- Policy SP10 Conservation of Natural Heritage; and
- Policy CW4 Natural Heritage Protection.

- 7.49. Policy AW8 of the RCTCB Council LDP details that proposals will only be permitted where they would not result in harm to a SINC or RIGS unless a number of tests can be met and where there would be no unacceptable impact upon features to landscape or nature conservation. Further, the Policy outlines that where protected and priority species may be affected, proposals must be accompanied by appropriate ecological surveys and appraisals. RCTCB Council's SPG for Nature Conservation sets out further guidance in relation to this policy. Paragraph 4.1.4 outlines that *'the significant features of European and nationally designated sites, SINCS and RIGS should be protected'*.

- 7.50. Policy SP10 of the CCB Council LDP outlines the protection, conservation, enhancement and management of natural heritage. The supporting text defines natural heritage as including biodiversity, consideration of habitats and wildlife, in addition to natural features. Policy CW4 addresses that where in close proximity to designated sites, including Sites of Importance for Nature Conservation or Local Priority Habitats and Species, proposals need to conserve or enhance (where appropriate) ecological designations or the need for development outweighs the ecological importance. Where need outweighs the ecological importance, mitigation measures to minimise harm are required.

- 7.51. A small part of the Site to the very west is located within Craig-Evan Leyshon Site of Importance for Nature Conservation (SINC). The Site is also located immediately adjacent to the Cilfynydd Coal Tips 'Regionally Important Geodiversity Site' (RIGS). This application is accompanied by an Ecological Impact Assessment and Biodiversity Management Plan.

- 7.52. Whilst the Site access intersects Craig-Evan Leyshon Common SINC and minor removal of bracken habitat within the SINC may be required along the site access to allow for adequate

turning circles and passing places, the loss of less than 100m² of bracken and grassland habitat is considered negligible and given the existing access track at this location would not negatively affect any of the criteria for which the SINC is designated.

- 7.53. The Ecological Impact Assessment outlines that the northern development parcel comprises predominantly modified grassland, where the BESS units will be predominantly sited, and improved acid grassland whilst the southern parcel is dominated by species poor rush pasture not meeting the priority habitat definition, which instead represents a waterlogged improved grassland. The area surrounding the substation will be subject to tree planting for screening purposes, with the remaining area managed through regular topping of rushes to recreate rush pasture of higher conservation value.
- 7.54. The land parcels for the cable corridor consists of further improved acid grassland, cropland and woodland. Woodland habitats along the cable route will be avoided where possible, with the cable instead routed through adjacent improved acid grassland habitats. Works associated with cabling will be short term and temporary and as such no permanent impacts are anticipated, cabling works will be undertaken following a soil management plan to ensure no permanent impact.
- 7.55. Grassland habitats within the Site are typically of low conservation value in their current state, being heavily grazed and lacking both structural and species diversity. While agricultural grassland of low ecological value will be lost to facilitate the proposed development, it is considered that the development presents opportunities for the creation of higher quality grassland.
- 7.56. Regarding protected and notable species, the Ecological Impact Assessment identifies and outlines the following, including mitigation measures where required:
 - The design of the Proposed Development so far as reasonably practicable avoids the most suitable habitats for breeding bird species, including woodland and hedgerow habitats with bird boxes proposed to provide enhancements for breeding bird species;
 - The Site is not considered suitable for ground nesting species due to current management practices of intensive sheep grazing;
 - The Landscape design includes substantial tree, woodland and hedgerow planting which will offer increased nesting habitat for a variety of bird species;
 - While some trees along field boundaries have been identified as offering bat roost potential to individual bats, these features will be retained and protected throughout construction and operation and as such no impacts to roosting bats are anticipated;
 - The Landscape design includes substantial tree, woodland and hedgerow planting which will serve to ensure that bat foraging and commuting habitats are not affected by the Proposed Development;
 - No evidence of badger was identified during the extended habitat surveys, and as such the species is considered likely absent from the Site;

- The likelihood presence of hazel dormice within the Site is considered to be low with boundary hedgerow largely retained and protected throughout construction;
- No ponds are located within 500m of the Site and the presence of great crested newt is considered unlikely, whilst the Site may be utilised by other amphibians, the majority of habitat lost on the Site is of low value to reptiles and amphibians and Reasonable Avoidance Measures will be applied to any works within suitable areas of habitat;
- The loss of pastoral farmland foraging habitat as a result of the Proposed Development is not considered to negatively impact local populations of brown hare and hedgehog and habitat creation would enhance the Site for these species if present;
- The watercourse of the Nant Ddu located immediately west of the existing Cllfynydd Substation is considered to be relatively isolated and of insufficient size, depth and permanence to support otter and water vole; and
- No invasive non-native species were recorded within the Site.

7.57. The Ecological Impact Assessment identifies a range of mitigation measures, some of which are set out above, to avoid or reduce the potential for adverse ecological impacts. The Biodiversity Management Plan outlines the biodiversity protection and ecological enhancement measures for the Proposed Development.

7.58. A Green Infrastructure Statement accompanies the application. The Statement outlines that the design enables the important landscape features, including the hedgerows, trees and grassland, to be respected and retained, with long term management designed to support their ability to thrive and succeed. The proposed landscape enhancements ensure that retained habitats are increased through new tree and hedgerow planting, and species increased within the grassland.

7.59. To conclude, the Proposed Development has been designed to avoid direct effects on the SINC, priority habitats and protected species insofar as practical and due to its nature, no significant adverse effects are anticipated during the construction and operational phases on any ecological features. When considering the proposal against the policy context, the impact of the Proposed Development complete with mitigation measures is compliant with the Development Plan policies identified above.

Noise

7.60. The relevant policies in relation to Noise within the Development Plan include:

RCTCB Council LDP

- Policy AW10 Environmental Protection and Public Health.

CCB Council LDP

- Policy CW19 Locational Constraints – Rural Development and Diversification.

- 7.61. Policy AW10 of the RCTCB Council LDP includes noise pollution, in respect of no unacceptable harm to health and/or local amenity, unless it can be demonstrated that measures can be taken to overcome any significant adverse risk to public health, environment and/or amenity. The CCB Council LDP Policy CW19 references development proposals being compatible with their rural location with the supporting Policy text detailing no unacceptable impact on the rural character, including in terms of noise.
- 7.62. This application is supported by a Noise Assessment, prepared by LF Acoustics. The Assessment concludes that, with the proposed mitigation measures, which includes acoustic fencing, noise levels attributable to the Proposed Development would be low and, therefore, would result in a low potential for adverse noise impact at the Site, with noise levels remaining below the prevailing background noise levels. In respect of the nearby Twyn Hywel Wind Farm and proposed synchronous condenser, alongside the operation of the proposed BESS, no cumulative impacts have been identified in respect of adverse noise impacts at the neighbouring properties when considering the three developments.
- 7.63. In consideration of the above, the Proposed Development remains in line with the relevant planning policies as outlined above.

Fire Safety

- 7.64. The relevant policies in relation to Fire Safety within the Development Plan include:

RCTCB Council LDP

- Policy AW10 Environmental Protection and Public Health.

CCB Council LDP

- Policy CW2 Amenity.

- 7.65. Policy AW10 of the RCTCB Council LDP details a number of local amenity factors, in addition to setting out '*any other identified risk to the environment, local amenity and public health safety*'. With regards to CCB Council LDP, Policy CW2 details that development proposals have no unacceptable impact on amenity.
- 7.66. To accompany this application, an Outline Battery Safety Management Plan (OBSMP) has been prepared to identify and assess the potential risks associated with the BESS design, installation, and operating capability and, in doing so, it provides a robust safety argument and reviews the Proposed Development against the National Fire Chiefs Council (NFCC) Grid Scale Battery Energy Storage System Planning – Guidance for FRS.
- 7.67. The OBSMP outlines various hazards with the Proposed Development and explains that these will be actively managed throughout the lifetime of the development. Where appropriate, some of the mitigation measures have been embedded in the design of the scheme. The OBSMP outlines that the Proposed Development is compliant/compliant subject to FRS confirmation, with the NFCC Guidance.
- 7.68. In respect of the above, the Proposed Development is in compliance with the relevant planning policies and national guidance as detailed above.

Heritage and Archaeology

- 7.69. The relevant policies in relation to Heritage and Archaeology within the Development Plan include:

RCTCB Council LDP

- Policy AW7 Protection and Enhancement of the Built Environment.

CCB Council LDP

- Policy SP10 Conservation of Natural Heritage.

- 7.70. Policy AW7 of the RCTCB Council LDP outlines the preservation or enhancement of the character and appearance of sites architectural and/or historic merit and sites of archaeological importance. This Policy also details the protection and enhancement of Public Rights of Way where affected. Policy SP10, as discussed above, addresses natural heritage which also relates to its relationship to the built environment.
- 7.71. A Heritage Statement has been submitted with this application. The Heritage Statement identifies that there are no heritage assets directly on the Site nor is the Site located within a Conservation Area. There are four Grade II Listed Buildings and two Scheduled Monuments within the area shown on the submitted SZTV, however, due to the established woodlands across the area, existing substations and associated overhead pylons, the Site would not impact upon any assets overall heritage significance.
- 7.72. The geophysical survey demonstrated there is little potential for substantial known archaeology to exist within the Site boundaries with those features uncovered likely relating to historic field boundaries and mining.
- 7.73. As no change is anticipated to the setting of the assets set out above, when considered with the impacts of the consented Twyn Hywel Energy Park, it is considered there would be no cumulative impacts in relation to heritage assets.
- 7.74. To conclude, the Proposed Development is in accordance with the Historic Environment Wales Act 2023, in addition to national and local policies. As such, it is considered that the Proposed Development accords with the relevant policies as detailed above.

Arboriculture

- 7.75. The relevant policies in relation to Arboriculture within the Development Plan include:

RCTCB Council LDP

- Policy AW8 Protection and Enhancement of the Natural Environment.

CCB Council LDP

- Policy CW6 Trees, Woodland and Hedgerow Protection.

- 7.76. Policy AW8 of the RCTCB Council LDP details that no unacceptable impact is caused to the natural environment and landscape features. Similarly, Policy CW6 of the CCB Council LDP

details proposals on sites containing trees, woodlands and hedgerows require arboricultural surveys, alongside their retention, protection and integration, with suitable replacements provided where appropriate.

7.77. Tree surveys have taken place on the Site to identify the number and quality of arboricultural features. An Arboricultural Impact Assessment accompanies this planning application has identified there would be no, or only a low potential negative impact on the retained trees. Whilst some tree and hedgerow removal is required on the Site as set out in the accompanying AIA, the removed trees and hedgerow will be of moderate to low quality and the loss of the trees can be readily mitigated, as set out in the Green Infrastructure Statement. In terms of the impact of the proposal, tree protection measures have been recommended, including temporary protective fencing around specific trees. The proposed security fencing is considered to be an effective tree protection barrier for trees located along the periphery of the Site.

7.78. In summary, the Proposed Development is not anticipated to result in any significant arboricultural impact on retained trees, groups or hedgerows at the Site. It is suggested as part of the conclusion that an Arboricultural Method Statement should be prepared and approved to ensure careful implementation and result in low potential for any negative impact on trees. With consideration for the above, it is not considered that there would be cumulative impacts with regard to arboriculture in terms of the consented schemes referred to in Section 2 and the proposals are considered compliant with the relevant national and local planning policy.

Transport and Access

7.79. The relevant policies in relation to Transport and Access within the Development Plan include:

RCTCB Council LDP

- Policy AW5 New Development.

CCB Council LDP

- Policy CW3 Design Considerations – Highways.

7.80. Policy AW5 of the RCTCB Council includes details regarding accessibility, including that development proposals have safe access to the highway network, not cause traffic congestion or exacerbate existing traffic and comprise appropriate parking provision. Similarly, Policy CW3 of the CCB Council LDP requires proposals to satisfy highway requirements, including safe use of the transportation network, safe and effective access, appropriate parking provision and highway design.

7.81. A Construction Traffic Management Plan (CTMP) and Transport Statement (TS) have been prepared, which accompanies the planning application. This CTMP sets out the access proposals and determines the number of trips likely during the construction period and considers its impact.

7.82. The CTMP concludes that whilst additional traffic on the highway network will be generated during the construction phase, the most appropriate primary routes have been identified to minimise impact on the local highway network.

- 7.83. In term of construction access, the CTMP outlines there will be a main vehicular access to the northern parcel via the existing access from National Road, access to the southern parcel will be created from National Road which runs through the centre of the Site. Swept path analysis for a 16.5m length HGV has been undertaken and is und which shows that turning into and out of the accesses to / from National Road is achievable in a safe and suitable manner. Swept path analysis of the secondary/emergency access for a 7.7m Fire Tender vehicle has also been demonstrated.
- 7.84. Additional traffic on the local highway network generated during the construction phase is expected to reach a peak of circa 82 two-way daily movements during the peak, including circa 30 two-way staff movements. Average daily flows throughout the construction period are forecast to be significantly lower. With the mitigation measures set out in the CTMP accompanying this report, the local highway network is suitable to accommodate the temporary increase in traffic movements associated with the construction phase.
- 7.85. Suitable mitigation will be provided in order to minimise the effects of the proposed construction on the local highway network including appropriate signage, site construction compounds and facilities. Mitigation measures will be agreed upon and finalised between the appointed contractor and RCTCBC.
- 7.86. Once the construction phase is concluded, the sites will operate predominately by remote access and is only visited on an occasional basis with minimal effect on the surrounding local network, it is anticipated that there could be 1 LGV accessing the site per month, equating to up to 12 LGV trips per year in the operational phase.
- 7.87. When reviewing the proposals against the consented Twyn Hywel Energy Park, the construction traffic associated with this wind farm is not proposed to route via National Road and therefore any cumulative impacts would occur on major A-roads which have a higher design specification and are suitable for accommodating heavy goods vehicles and construction traffic. In terms of the approved synchronous condenser, construction is anticipated to finish March 2025 and therefore, it would not overlap with the forecasted construction phases for the Site.
- 7.88. The CTMP and TS concludes overall that there are no valid highway or transportation reasons which would prevent the Proposed Development of the Site and the proposal is, therefore, in accordance with the above planning policies.

Flood Risk and Drainage

- 7.89. The relevant policies in relation to Flood Risk and Drainage within the Development Plan include:

RCTCB Council LDP

- Policy AW10 Environmental Protection and Public Health.

CCB Council LDP

- Policy CW5 Protection of the Water Environment.

- 7.90. The RCTCB Council LDP Policy AW10 details that development proposals must not cause or result in a risk of unacceptable harm to health and/or local amenity as a result of a number

of factors, including flooding. Policy CW5 of the CCB Council LDP establishes no unacceptable adverse impact on the water environment and the quality of controlled waters, including groundwater and surface water.

- 7.91. As demonstrated in the accompanying Flood Consequence Assessment and Surface Water Drainage Strategy, which considered the latest flood risk maps and an assessment of ground conditions, the development parcels of the Site largely represent a greenfield area at low risk of flooding and is compliant with the policy requirements.
- 7.92. A Surface Water Drainage Strategy has been prepared to manage surface water runoff from the Proposed Development. The proposed Strategy will ensure surface water runoff rates from the Site do not increase as a result of the Proposed Development and, therefore, also ensure that associated surface water flood risk also does not increase. The proposed substation will be managed with geo-cellular crates outfalling into a local Ordinary Watercourse at a restricted rate. To maintain current surface water flow patterns on the Site and in the local area, surface water runoff from the proposed BESS will outfall at the southern end of the Site via a series of gravel trenches. The proposed Surface Water Drainage Strategy has been designed to manage all storm events up to and including the 1 in 100 year plus an allowance for climate change. The Strategy has also been designed to account for the provision and containment of fire water.
- 7.93. Overall, the Proposed Development is not considered to be at significant risk of flooding and a Surface Water Drainage Strategy will be implemented to ensure flood risk elsewhere is not impacted. Consequently, the proposal accords with the requirements of the Development Plan and national policy with residual risk to the Site fully mitigated and, therefore, considered low risk.
- 7.94. With consideration for the above, it is considered that the Proposed Development, when considered cumulatively with the nearby approved developments set out in Section 2 would not result in any cumulative impacts with regard to flood risk.

Agricultural Land

- 7.95. The relevant policies in relation to agricultural land within the Development Plan include:

RCTCB Council LDP

- Policy AW12 Renewable & Non-Renewable Energy.

- 7.96. The RCTCB Council LDP Policy AW12 details that development proposals for the provision of renewable energy will be permitted where there are no unacceptable impact on the interests of agriculture, amongst other factors. PPW states that in decision-making, considerable weight should be given to protecting such land from development, because of its special importance and that development should be directed to land of the lowest grade.
- 7.97. The Site does not constitute Best and Most Versatile land as shown on the DataMapWales. The Site is classed as Grade 4 (Poor) and 5 (Very Poor) Agricultural Land. As such, no agricultural survey is required in accordance with Welsh Government Guidance and, therefore, the development of the Site is consistent with national and local planning policy requirements.

7.98. The Proposed Development is temporary form in nature (circa 40 years) and over this time, the soil can regenerate, which will help to improve quality of agricultural land in the future. With regards to the above, the Proposed Development meets the requirements of the relevant local and national policies.

7.99. With consideration for the above, it is considered that the Proposed Development, when considered cumulatively with the nearby approved developments set out in Section 2 would not result in any cumulative impacts with regard to impacts on agricultural land.

Mineral Safeguarding

7.100. The relevant policies in relation to Mineral Safeguarding within the Development Plan include:

RCTCB Council LDP

- Policy CS10 Minerals; and
- Policy AW14 Safeguarding of Minerals.

CCB Council LDP

- Policy CW22 Locational Constraints – Minerals.

7.101. Policy CS10 of the RCTCB Council LDP seeks to protect resources and ensure a continuous supply of minerals, including ensuring the appropriate restoration and aftercare measures are incorporated. Policy AW14 sets out the safeguarding of mineral resources from development proposals which would unnecessarily sterilise them or hinder their extraction, including resources of Sandstone. Similarly, Policy CW22 of the CCB Council LDP concerns proposals which may impact on minerals safeguarding areas. Of particular relevance, the Policy sets out that proposals of a temporary nature within these areas will not be approved unless the site is restored to a condition that does not inhibit mineral extraction, within the timescale that the mineral is likely needed.

7.102. The Site falls within a Sandstone Resource/Safeguarding Area and the requirements of Policy AW14 are applicable, meaning sandstone resources around the Site are safeguarded from any permanent development which would hinder their extraction. These designations cover a large area of both County Boroughs.

7.103. Publicly available data suggests that the Site is underlain by sandstones of the Hughes Member. The British Geological Survey describes the Hughes Member as being “Green-grey lithic arenites (‘Pennant sandstones’), with mudstone/siltstone and seatearth interbeds and mainly thin coals”. The Hughes Member is identified as being widespread throughout the South Wales Coalfield to a depth of some 45m near Pontypool and 270m near Swansea. Historic borehole data suggests the presence of soils and clay to a depth of around 3m underlain by sandstone to a depth of around 25m.

7.104. The Proposed Development would be longer term but temporary in nature with a proposed lifespan of around 40 years. Upon completion of the proposed life of the development, all plant and machinery would be removed and the land reinstated, as such, the Proposed Development would not permanently sterilise any mineral.

- 7.105. In light of the above, the Proposed Development accords with the above relevant policy context, particularly given the proposed temporary nature. Given the extensive area that the mineral designations cover, it is considered that the Proposed Development, when considered cumulatively with the nearby approved developments would not result in any cumulative impacts with regard to mineral safeguarding.

Economic Benefits

- 7.106. There are additional economic indirect benefits to the proposed BESS development, which are summarised below and also evidenced within the accompanying Economic Benefits Infographic.
- 7.107. During the construction and operational phase, the investment of approximately £86 million will be generated in order to develop a BESS of approximately 200MW.
- 7.108. There would be a number of people employed over the course of the 3-year build programme, with the proposals supporting up to 54 temporary jobs on-site and in the wider economy, and 5 permanent operation and maintenance jobs once the scheme is built and operational. The construction phase will also make a significant contribution to economic output, with the gross value added generated over the 36-month construction phase could be up to £9.8 million and £6.1 million over the 40-year operational lifespan of the scheme. Collectively, this will provide a significant contribution to the local economy.
- 7.109. Further, in respect of energy security, the Proposed Development can provide back up to 2000 households in the Nelson ward and 345 businesses in the local area in proximity to the Site.

Sustainable Development

- 7.110. The Site falls within both the Northern and Southern Strategy areas designated under the RCTCB Council LDP. As such, both Policies CS1 'Development in the North' and 'Development in the South' are applicable to the development. Policy CS1 places emphasis on building strong and sustainable communities whilst Policy CS2 emphasises sustainable growth that benefits the county as a whole. As set out above and below, the proposal will deliver a number of economic, social and environmental benefits and as such, can be considered a sustainable development which will assist in the building of sustainable communities and provide local and national benefits by assisting in meeting Net Zero targets
- 7.111. As detailed in Section 4, Future Wales details that proposals should describe the net benefits of a Proposed Development in terms of social, economic, environmental and cultural improvements. There are clear benefits of BESS development in making a valuable contribution towards transitioning to reliance on renewable energy generation and storage and meeting national targets.
- 7.112. BESS developments provide security of energy supply through the storage and distribution of electricity, alongside reduced energy costs for the consumer due to less energy wastage. The social benefits arising from this type of development can be realised through reduced energy bills and increased security of supply, which could minimise Wales' exposure to the volatility of the wholesale energy markets. These considerations are key to addressing fuel poverty, which disproportionately effects low-income households and contributes to economic inequality.

- 7.113. In terms of environmental benefits, the Proposed Development would enable the storage and release of electricity when there are lulls and peaks in energy demand and usage. As such, the Proposed Development would play a vital role in moving towards achieving Net Zero targets and minimising climate impacts. The submitted Green Infrastructure Plan and Biodiversity Management Plan also addresses how environmental benefits will be achieved on the Site through landscaping and biodiversity enhancements.

Planning Balance

- 7.114. To summarise, the above Planning Assessment has demonstrated the following:
- This planning application is in broad compliance with the Development Plan and national planning policy and guidance;
 - The Site is a suitable and available location for the Proposed Development, in proximity to the existing Cilfynydd 400kV Substation, which has a viable grid capacity and POC;
 - The Site has limited environmental and technical constraints, as detailed within this Statement;
 - The impacts associated with the Proposed Development at this location are limited and acceptable and, therefore, the proposal is in general compliance with planning policies in the Development Plan; and
 - The Proposed Development give rise to a wide range of environmental and economic benefits which amount to a very substantial weight in favour of planning permission being granted, including up to 54 temporary roles on-site and in the wider economy and an estimated 5 permanent operation and maintenance jobs,
- 7.115. As opportunities for grid connection are scarce, it is clear that the planning system should support the transition to net zero by 2050 through supporting renewable energy and associated infrastructure. This proposal is an enabling infrastructure, which increases the efficiency of renewable assets and supports Wales' target to generate 70% of consumed electricity by renewable means by 2030 and 100% by 2035. The scale proposed ensures the capacity of the grid connection can be maximised to help achieve these targets.
- 7.116. In consideration of compliance with the Development Plan and other planning policy requirements and the significant benefits associated with the Proposed Development, it is clear that this development is, on balance, acceptable in planning terms. Should, however, the decision maker arrive at the view that there are policy tensions, it is clear that the benefits of the proposal are considered to outweigh the effects.
- 7.117. The imperative need to deliver contributions from low carbon energy is a fundamental part of the UK and Welsh Government's commitment to Net Zero by 2050 and the Welsh Government's target of generating the equivalent of 100% of Wales' annual electricity consumption from renewable sources by 2035. The Proposed Development would contribute towards these requirements. Taken overall, the balance of planning consideration weighs heavily in favour of the benefits which would arise from this scheme.

8. Summary and Conclusion

- 8.1. This Planning Statement has been prepared by Pegasus Group on behalf of REWE 2 Ltd in support of the accompanying planning application for a Battery Energy Storage System (BESS) with Associated Infrastructure, Earthworks including On-Site Substation, Access, Drainage and Landscaping and Underground Cable Route Connection at Land North and South of National Road, Cilfynydd. The Site is located across the administrative area of Rhondda Cynon Taf County Borough Council and Caerphilly County Borough Council.
- 8.2. The Proposed Development would involve the construction and operation of a BESS along with associated infrastructure, including a substation and cable route connection to the existing Cilfynydd 400kV Substation. The BESS will have a capacity of approximately 200MW, enabling energy to be stored and released into the local distribution network depending on the demand.
- 8.3. The Proposed Development supports the Welsh Assembly's and UK Government's intention move to a low carbon economy, which represents a substantial benefit.
- 8.4. The Development Plan for the area relevant to this application comprises the following documents:
- Future Wales – The National Plan 2040 (Adopted 2021);
 - Rhondda Cynon Taf County Local Development Plan up to 2021 (Adopted 2011); and
 - Caerphilly County Borough Local Development Plan up to 2021 (Adopted 2010).
- 8.5. The proposal has been shown to be in general compliance with the relevant Development Plan policies and, whilst there may be policy tensions, it is considered that there is no conflict. Should the decision maker arrive at the view that there is a policy breach, however, it is clear that the benefits of the proposal are considered to outweigh the effects. National planning policy and guidance is a material consideration in the determination of this planning application, which identifies that significant weight should be attributed to the benefits associated renewable and low carbon energy generation and the proposal's contribution to a net zero future.
- 8.6. Accordingly, there is an evident need for development of this type and as this application generally complies with the relevant Development Plan and other material considerations, therefore, this planning application should be approved without delay.

Appendix 1 – Local Planning Policy.

Table 1 – Relevant Rhondda Cynon Taf County Borough Council Policies

Policy	Summary
Policy CS1 – Development in the North	<i>"In the Northern Strategy Area the emphasis will be on building strong, sustainable communities. This will be achieved by –</i> <i>1. Promoting residential and commercial development in locations which will support and reinforce the roles of Principal Towns and Key Settlements;</i> <i>2. Providing high quality, affordable accommodation that promotes diversity in the residential market;</i> <i>3. Ensuring the removal and remediation of dereliction by promoting the re-use of under used and previously developed land and buildings;</i> <i>4. Promoting large scale regeneration schemes in the Principal Town of Aberdare and in the Key Settlements of Mountain Ash, Ferndale and Treorchy;</i> <i>5. Promoting accessibility by securing investment in new roads, public transport improvements, walking and cycling;</i> <i>6. Encouraging a strong, diverse economy which supports traditional employment and promotes new forms of employment in the leisure and tourism sectors;</i> <i>7. Protecting the cultural identity of the Strategy Area by protecting historic built heritage and the natural environment;</i> <i>8. Promoting and enhancing transport infrastructure services to support growth and investment; and</i> <i>9. Reducing daily out commuting by private car and promoting sustainable forms of travel."</i>
Policy CS2 – Development in the South	<i>"In the Southern Strategy Area the emphasis will be on sustainable growth that benefits Rhondda Cynon Taf as a whole. This will be achieved by:-</i> <i>1. Promoting residential development with a sense of place which respects the character and context of the Principal Towns and Key Settlements of the Southern Strategy Area;</i> <i>2. Protecting the culture and identity of communities by focusing development within defined settlement boundaries and promoting the reuse of under used and previously developed land and buildings;</i>

	3. Promoting large scale regeneration schemes in the Principal Town of Pontypridd and Key Settlement of Tonyrefail; 4. Realising the importance of the Principal Town of Llantrisant / Talbot Green as an area of social and economic growth; 5. Providing opportunities for significant inward investment, in sustainable locations, that will benefit the economy of Rhondda Cynon Taf and the Capital Region; 6. Reducing daily out commuting by private car and promoting sustainable forms of transport; 7. Protecting the cultural identity of the Strategy Area by protecting historic built heritage and the natural environment, and 8. Promoting and enhancing transport infrastructure services to support growth and investment."
Policy CS 10 – Minerals	"The Council will seek to protect resources and to contribute to the local, regional and national demand for a continuous supply of minerals, without comprising environmental and social issues, by: 1. Maintaining a minimum 10 year landbank of permitted rock aggregate reserves throughout the plan period (to 2021), together with an extended landbank in the form of a Preferred Area of Known Mineral Resource; 2. Defining safeguarding areas for mineral resources, including coal, high quality hard rock, limestone and sand and gravel, taking into account the range, quality and extent of resources and environmental, planning and transportation considerations; 3. Where proven resources are under threat from sterilisation by necessary development, the pre-working of the mineral resource will be encouraged; 4. Ensuring that appropriate restoration and aftercare measures are incorporated; 5. Promoting efficient usage, minimising production of waste, and promoting alternatives to primary won aggregates; 6. Ensuring that impacts upon residential areas and sensitive land uses from mineral operations and the transportation of minerals are limited to an acceptable proven safe limit."
Policy AW2 – Sustainable Locations	"In order to ensure that development proposals on non-allocated sites support the objectives of the plan, development proposals will only be supported in sustainable locations. Sustainable locations are defined as sites that:–

	<i>1. Are within the defined settlement boundary or in the Northern Strategy Area, accord with Policy NSA 12;</i> <i>2. Would not unacceptably conflict with surrounding uses;</i> <i>3. Have good accessibility by a range of sustainable transport options;</i> <i>4. Have good access to key services and facilities;</i> <i>5. Do not permit highly vulnerable development and Emergency Services within Zone C2 floodplain. Within Zone C development will be permitted where it can be justified that: –</i> <i>a) It is necessary to assist the regeneration of a Principal Town or Key Settlement including the key employment objectives, or where development involves a large brownfield site.</i> <i>b) The potential consequences of a flooding event have been considered and found to be acceptable in accordance with national guidance and meet the definition of previously developed land.</i> <i>6. Support the roles and functions of the Principal Towns, Key Settlements and Small Settlements;</i> <i>7. Support the development of the 8 Strategic Sites;</i> <i>8. Are well related to existing water, sewerage, waste, electrical, gas and telecommunications infrastructure and improvements to such services will be provided where necessary.</i> <i>9. Where proposals relate to existing buildings in the countryside, accord with AW 9.”</i>
Policy AW4 – Community Infrastructure & Planning Obligations	<i>“Planning obligations may be sought where development proposals require the provision of new, improved or rely on existing services, facilities, infrastructure and related works, to make the proposal acceptable in land use planning terms. Contributions may be sought in respect of:</i> <i>1. Affordable housing;</i> <i>2. Physical infrastructure works;</i> <i>3. Open space, sport / play space and access to natural green space;</i> <i>4. Educational facilities;</i> <i>5. Recreational and leisure facilities;</i> <i>6. Management of Strategic Transport Corridors;</i>

	7. Public transport facilities and services; 8. Travel plan initiatives; 9. Highway infrastructure works; 10. Walking and cycling schemes; 11. Waste management and recycling; 12. Renewable energy and energy efficiency initiatives. 13. Environmental and landscape improvements; 14. Nature conservation; 15. Public Art; 16. Culture and community facilities; and 17. Any other contribution the Council considers appropriate to the development.”
Policy AW5 – New Development	“Development proposals will be supported where: 1. Amenity a. The scale, form and design of the development would have no unacceptable effect on the character and appearance of the site and the surrounding area; b. Where appropriate, existing site features of built and natural environment value would be retained; c. There would be no significant impact upon the amenities of neighbouring occupiers; d. The development would be compatible with other uses in the locality; e. The development would include the use of multi-functional buildings where appropriate; f. The development designs out the opportunity for crime and anti social behaviour.”
Policy AW6 – Design and Placemaking	“Development proposals will be supported where: 1. They are of a high standard of design, which reinforces attractive qualities and local distinctiveness and improves areas of poor design and layout;

	<i>2. They are appropriate to the local context in terms of siting, appearance, scale, height, massing, elevational treatment, materials and detailing;...</i> <i>7. Landscaping and planting are integral to the scheme and enhance the site and the wider context....</i> <i>13. The development reflects and enhances the cultural heritage of Rhondda Cynon Taf.</i> <i>14. The design protects and enhances the landscape and biodiversity.</i> <i>15. The development promotes energy efficiency and the use of renewable energy.</i> <i>16. The design promotes good water management, including rainwater storage, sustainable urban drainage and porous paving."</i>
Policy AW7 – Protection and Enhancement of the Built Environment	<i>"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.</i> <i>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 :</i> <i>1. There is a surplus of such facilities in the locality, or;</i> <i>2. The loss can be replaced with an equivalent or greater provision in the immediate locality; or</i> <i>3. The development enhances the existing facility."</i>
Policy AW8 – Protection and Enhancement of the Natural Environment	<i>"The Council's distinctive natural heritage will be preserved and enhanced by protecting it from inappropriate development. Development proposals will only be permitted where:</i> <i>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:-</i> <i>a. The proposal is directly necessary for the positive management of the site; or</i> <i>b. The proposal would not unacceptably impact on the features of the site for which it has been designated; or</i>

	<i>c. The development could not reasonably be located elsewhere and the benefits of the proposed development clearly outweigh the nature conservation value of the site.</i> <i>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.</i> <i>All development proposals, including those in built up areas, 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.</i> <i>Development proposals must be accompanied by appropriate ecological surveys and appraisals, as requested by the Council. Development proposals that contribute to the management or development of Ecological Networks will be supported."</i>
Policy AW10 – Environmental Protection and Public Health	<i>"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:</i> <i>1. Air pollution;</i> <i>2. Noise pollution;</i> <i>3. Light pollution;</i> <i>4. Contamination;</i> <i>5. Landfill gas;</i> <i>6. Land instability;</i> <i>7. Water pollution;</i> <i>8. Flooding;</i> <i>9. Or any other identified risk to the environment, local amenity and public health or safety</i> <i>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."</i>
Policy AW12 – Renewable and Non-Renewable Energy	<i>"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, will be permitted where it can be demonstrated that there is no unacceptable effect upon the interests of soil conservation,</i>

	<i>agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity.</i> <i>Development proposals should be designed to minimise resource use during construction, operation and maintenance."</i>
Policy AW14 – Safeguarding of Minerals	<i>"The following mineral resources shall be safeguarded from any development which would unnecessarily sterilise them or hinder their extraction...</i> <i>2. The resources of Sandstone, as shown on the proposals map, will be safeguarded from development."</i>
Policy SSA23 – Special Landscape Areas	<i>"Special Landscape Areas are identified at the following locations:... 10. Taff Vale Eastern Slopes.</i> <i>Development within the defined Special Landscape Areas will be expected to conform to the highest standards of design, siting, layout and materials appropriate to the character of the area."</i>

Table 2 – Relevant Caerphilly County Borough Council Local Development Plan Policies

Policy	Summary
Policy SP2 – Development Strategy – Development in the Northern Connections Corridor	<i>"Development proposals in the Northern Connections Corridor will promote sustainable development that:</i> <i>A Focuses significant development on both brownfield and greenfield sites that have regard for the social and economic functions of the area</i> <i>B Reduces car borne trips by promoting more sustainable modes of travel</i> <i>C Makes the most efficient use of the existing infrastructure</i> <i>D Protects the natural heritage from inappropriate forms of development</i> <i>E Capitalises on the economic opportunities offered by Oakdale / Penyfan Plateau".</i>
Policy SP5 – Settlement Boundaries	<i>"The Plan defines settlement boundaries in order to:</i> <i>A Define the area within which development would normally be allowed, taking into account material planning considerations</i> <i>B Promote the full and effective use of urban land and thus concentrate development within settlements</i>

	<i>C Prevent the coalescence of settlements, ribbon development and fragmented development</i> <i>D Prevent inappropriate development in the countryside”.</i>
Policy SP6 – Placemaking	<i>“Development proposals should contribute to creating sustainable places by having full regard to the context of the local, natural, historic and built environment and its special features through:</i> <i>A An appropriate mix of uses that reflect the role and function of settlements</i> <i>B A high standard of design that reinforces attractive qualities of local distinctiveness</i> <i>C Design in accordance with best practice in terms of designing out crime</i> <i>D A location and layout that reflects sustainable transport and accessibility principles and provides full, easy and safe access for all</i> <i>E The incorporation of resource efficiency and passive solar gain through layout, materials, construction techniques, water conservation, and where appropriate the use of sustainable drainage systems</i> <i>F The efficient use of land, including higher densities where development is close to key transport nodes</i> <i>G The incorporation and enhancement of existing natural heritage features</i> <i>H The incorporation of mitigation measures that improve and maintain air quality”.</i>
Policy SP8 – Mineral Safeguarding	<i>“The Council will contribute to the regional demand for a continuous supply of minerals by:</i> <i>A Safeguarding known resources of coal, sand and gravel and hard rock</i> <i>B Maintaining a minimum 10-year land bank of permitted aggregate reserves in line with national guidance”.</i>
Policy SP10 – Conservation of Natural Heritage	<i>“The Council will protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all development proposals within both the rural and built environment”.</i>
Policy CW2 – Amenity	<i>“Development proposals must have regard for all relevant material planning considerations in order to satisfy the following requirements:</i>

	<i>A There is no unacceptable impact on the amenity of adjacent properties or land</i> <i>B The proposal would not result in overdevelopment of the site and / or its surroundings</i> <i>C The proposed use is compatible with surrounding land-uses and would not constrain the development of neighbouring sites for their identified land-use</i> <i>D Where applicable, the viability of existing neighbouring land uses would not be compromised by virtue of their potential impact upon the amenity of proposed new residential development”.</i>
Policy CW3 – Design Considerations – Highways	<i>“Development proposals must satisfy the following highways requirements:</i> <i>A The proposal has regard for the safe, effective, and efficient use of the transportation network</i> <i>B The proposal ensures that new access roads within development proposals are designed to a standard that:</i> <i>i Promotes the interests of pedestrians, cyclists and public transport before that of the private car, and</i> <i>ii Safely and effectively accommodates the scale and nature of traffic, which those roads are intended to serve</i> <i>C Parking, appropriate servicing and operational space have been provided in accordance with the CSS Wales Parking Standards 2008</i> <i>D Where access onto a highway is required the proposal takes account of the restrictions relevant to the class of road as designated in the road hierarchy ensuring movements and speeds are controlled through appropriate design, in order to ensure highway safety and amenity”.</i>
Policy CW4 – Natural Heritage Protection	<i>“Development proposals that affect locally designated natural heritage features, will only be permitted:</i> <i>A Where they conserve and where appropriate enhance the distinctive or characteristic features of the Special 2 49 Landscape Area (SLA) or Visually Important Local Landscape (VILL).</i> <i>B Within, or in close proximity to sites designated as Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR), Regionally Important Geological Sites (RIGS), Green Corridors, or Local Priority Habitats and Species, where proposals either:</i>

	<i>i Conserve and where appropriate enhance the ecological or geological importance of the designation, or</i> <i>ii Are such that the need for the development outweighs the ecological importance of the site, and where harm is minimised by mitigation measures and offset as far as practicable by compensation measures designed to ensure that there is no reduction in the overall value of the area or feature”.</i>
Policy CW5 – Protection of the Water Environment	<i>“Development proposals will only be permitted where:</i> <i>A They do not have an unacceptable adverse impact upon the water environment, and</i> <i>B Where they would not pose an unacceptable risk to the quality of controlled waters (including groundwater and surface water)”.</i>
Policy CW6 – Trees, Woodland and Hedgerow Protection	<i>“Development proposals on sites containing trees, woodlands and hedgerows, or which are bordered by one of more such trees or hedgerows, will only be permitted provided that:</i> <i>A Where arboricultural surveys are required, they are submitted and approved, including any mitigation, compensation or management requirements, as part of the planning application.</i> <i>B Root systems will be retained and adequately protected for the duration of all development activity on site.</i> <i>C Development proposals have made all reasonable efforts to retain, protect and integrate trees, woodlands or hedgerows within the development site.</i> <i>D Where trees, woodlands or hedgerows are removed, suitable replacements are provided where appropriate”.</i>
Policy CW15 – General Locational Constraints	<i>Development proposals will be considered against the following criteria, where they apply:</i> <i>A Development proposals will not be permitted if they prejudice the implementation of wider comprehensive redevelopment or constrain the development of any adjacent site for its allocated land-use...</i> <i>C Outside settlement boundaries proposals will not be permitted unless the proposed development is either:...</i> <i>iv Associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere...”.</i>

Policy CW19 – Locational Constraints – Rural Development and Diversification	<i>Rural Development and Diversification schemes will be permitted where:</i> <i>A They are consistent in scale and compatible with their rural location, including the retention and enhancement of existing natural heritage features...</i> <i>C They will be complementary to, and not prejudice, the operation of the existing business”.</i>
Policy CW22 – Locational Constraints – Minerals	<i>“Development proposals which may impact on minerals safeguarding areas will be considered against the following requirements, as applicable:...</i> <i>B Proposals for development uses of a temporary nature within identified mineral safeguarding areas will not be approved unless they can be completed and the site restored to a condition that does not inhibit mineral extraction within the timescale that the mineral is likely to be needed”.</i>
Policy NH1 – Special Landscape Areas	<i>“Special Landscape Areas are identified and will be protected at the following locations:</i> <i>NH1.3 Mynydd Eglwysilan.”</i>

Appendix 2 – Cable Route Details.

Proposed Grid Connection Route

The electricity generated by the Proposed Development is expected to be importing and exporting via a 400kV connection between the Onsite Substation and the existing National Grid Cilfynydd Substation. The connecting infrastructure to Cilfynydd National Grid Substation will comprise 400kV cables buried within a trench, up to 3mtr maximum in depth (see Indicative Cross Section in **Appendix 3**). The cables within the trench are anticipated to have a minimum separation distance of 500mm between them. The trench will also include a fibreoptics communications cable connecting the Onsite Substation with the Cilfynydd National Grid Substation.

The depth and separation of the cables will be designed in accordance with the British Standard and National Grid Recommendation boundaries to minimise the potential for magnetic field effects on relevant receptors.

The Grid Connection Route (circa 700m, subject to further refinement) will cross agricultural field parcels and non-operational land under the ownership of National Grid within the cable route corridor, before going on to connect within the Substation compound. Final routing and specifications are subject to further detailed design.

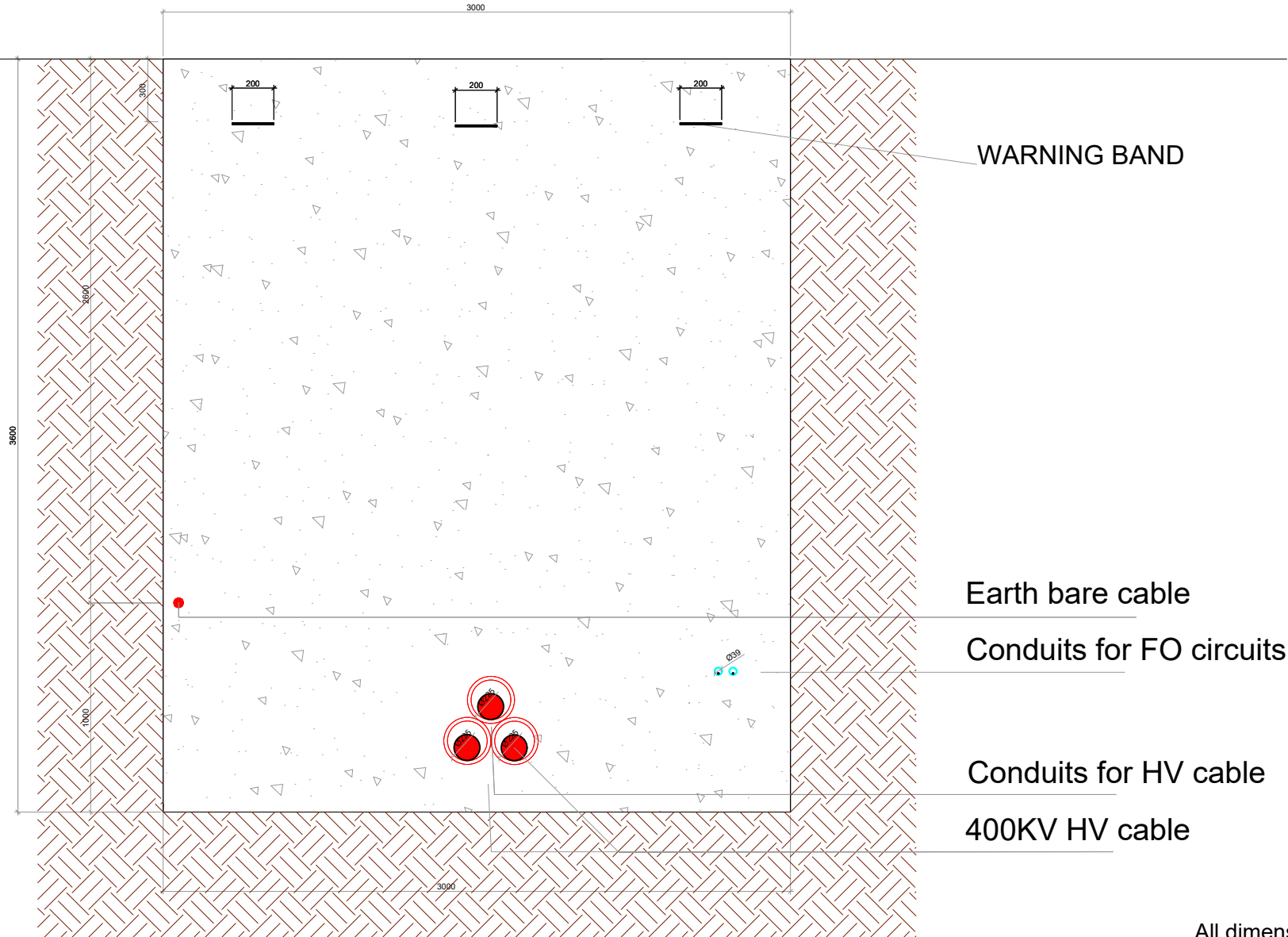
High Level Proposed Construction Methodology

1. Cable trench marking for excavation using a surveyor.
2. Excavation of the trench to the designated depth.
3. Levelling cable trench bed.
4. Laying of power, earthing, communications cables and associated ducting.
5. Cables continuity and insulation resistance testing.
6. Backfilling of the trench using excavated materials.
7. Laying of Warning bands.
8. Finishing the Backfilling and reinstatement of the topsoil.
9. Laying overground 400KV HV cables markers in intervals along the cable route.



Appendix 3 – Indicative Cable Trench Section.

400KV CABLE TRENCH SECTION



All dimensions are in mm

TYPICAL

P01	EA	DO	First Issue		06/02/2025
Indicative 400 KV Cable Trench Cross section		CLBS_RE25_CS_GB001	Cable Trench Cross section		NTS
Cyllynydd		United Kingdom			A4
Recurrent Energy			PRELIMINARY		1/1

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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