Pennant Walters

Mynydd y Glyn Wind Farm

Draft Planning Statement

This report was prepared by WSP Environment & Infrastructure Solutions UK Limited (formerly known as Wood Environment & Infrastructure Solutions UK Limited), company registration number 02190074, which is carrying out these services as a subcontractor and/or agent to Wood Group UK Limited

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Report for

Meryl Lewis
Pennant Walters Ltd
Hirwaun House
Hirwaun Industrial Estate
Hirwaun
Aberdare
CF44 9UL

Main contributors

Andrew Williamson

Issued by

David.Kenyon Digitally signed by David.Kenyon
Date: 2022.10.24 16:02:42 +01'00'

.....

David Kenyon

Approved by

.....

Chris Prydderch

WSP Environment & Infrastructure Solutions UK Limited

Canon Court
Abbey Lawn
Abbey Foregate
Shrewsbury SY2 5DE
United Kingdom
Tel +44 (0)1743 342 000

Doc Ref. 42864

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Contents

1. Introduction

1.1 Overview

1.1.1 This Draft Planning Statement has been prepared on behalf of Pennant Walters Ltd by Wood Group UK Ltd (Wood) as one of a suite of documents supporting a planning application for the construction and operation of a wind farm comprising up to seven wind turbines at Mynydd y Glyn, to the east of Trabanog within the Rhondda Cynon Taff County Borough Council (RCTCBC) area (referred to as the Proposed Development form here on). This Draft Planning Statement has been prepared to demonstrate the suitability of the Proposed Development in planning terms. It has been prepared as part of a suite of documents to support the process of pre-application consultation prior to the submission of the final proposals to Planning and Environment Decisions Wales (PEDW) on behalf of the Welsh Government for consent as a Development of National Significance (DNS).

1.1.2 This Draft Planning Statement should be read in conjunction with the accompanying **Draft Design and Access Statement** (Draft DAS), which sets out the approach taken to the design and access of the Proposed Development, and the **Draft Environmental Statement** (Draft ES), which sets out an assessment of the likely significant environmental effects of the Proposed Development.

1.2 Purpose of the Planning Statement

1.2.1 The purpose of this Draft Planning Statement is to:

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

1.3 Pre-application consultation

1.3.1 This Draft Planning Statement along with other supporting documents for the proposed DNS planning application, including the Draft ES, will be subject to six weeks pre-application consultation. The results of which will be used to refine and update (where necessary) the application documents prior to final submission to PEDW.

1.4 Structure of the Planning Statement

1.4.1 The remainder of the document provides the following information:

- **Section 2** - Provides a description of the applicant, the site, the Proposed Development, planning history and Environment Impact Assessment (EIA) approach;
- **Section 3** - considers the need for the development, the issues of climate change and security of supply and as a consequence the pressing need for renewable energy. The

section demonstrates how the Proposed Development could make a contribution to reducing the effect of climate change and improving security of supply;

- **Section 4** - this section summarises the national and local policy context and analyses how the scheme performs against national planning policy requirements. It also sets out how the scheme performs against the RCTCBC Local Development Plan (LDP) and any other material considerations; and
- **Section 5** - concludes how the scheme meets the planning policy requirements through application of the planning balance.

2. Overview of the Proposed Development

2.1 The Applicant

2.1.1 Pennant Walters Ltd (the Applicant) is seeking planning permission for the construction and operation of a wind farm of up to seven turbines on land at Mynydd y Glyn, (the Site).

2.1.2 Based in Wales, Pennant Walters Ltd is a Walters Group company with a focus on renewable energy having developed a wide variety of schemes including onshore wind, solar, small scale hydro and battery storage.

2.2 The Site

2.2.1 The Site is located approximately 1km east of Trebanog and approximately 600m south east of Glynfach. Grid reference for the site is ST 03626 89459. The site would be accessed via a new track leading from a new junction taken from the A4233.

2.2.2 The Proposed Development would be located on the summit and upper slopes of Mynydd-y-Glyn to the south of Rhondda River, the is absent of distinct field boundaries and tree cover resulting in it being open and exposed.

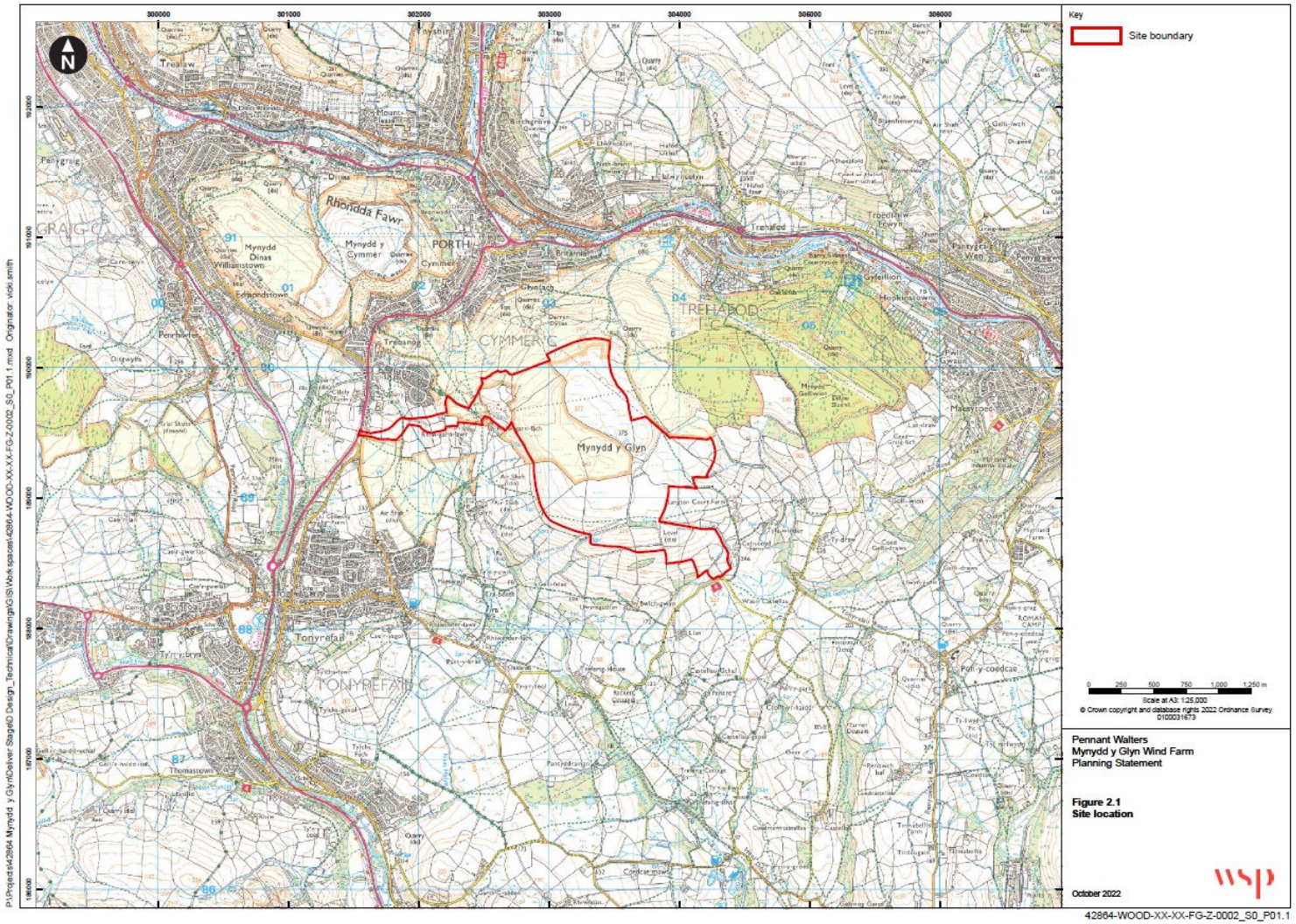
2.2.3 There is no built development within the Site, but it is traversed by an overhead electricity transmission line supported by double pole pylons.

2.2.4 The Site is crossed by eight public footpaths (PRoWs) four of which cross the proposed access route to the turbines. One footpath, (RH|ANT|75/1) forms part of the Penrhys Pilgrimage Way which is a 21 mile long path from Llandaff Cathedral in Cardiff to Penrhys in the Rhondda. The on-site grid connection corridor and the grid connection corridor also cross footpaths. There is access land present across the northern slopes and a proportion of the summit with a further small area of access land located to the north of Tonyrefail.

2.2.5 Parts of the Site are located within a Site of Importance for Nature Conservation (SINC), designated within the RCTCBC Local Development Plan (LDP). Additionally, the Site lies within Mynydd y Glyn and Nant Muchudd Basin Special Landscape Area (SLA), partially within Rhondda Historic Landscape Area and approximately 15km from the Brecon Beacons National Park.

2.2.6 The site has a total area of approximately 182 ha. The site location is shown in **Figure 2.1**.

Figure 2.1 Location Plan



2.3 The Proposed Development

2.3.1 The main elements of the Proposed Development are the construction, installation and operation of up to seven wind turbines with an installed capacity of up to 30MW[1] dependent on the final turbine choice. The Proposed Development will also include:

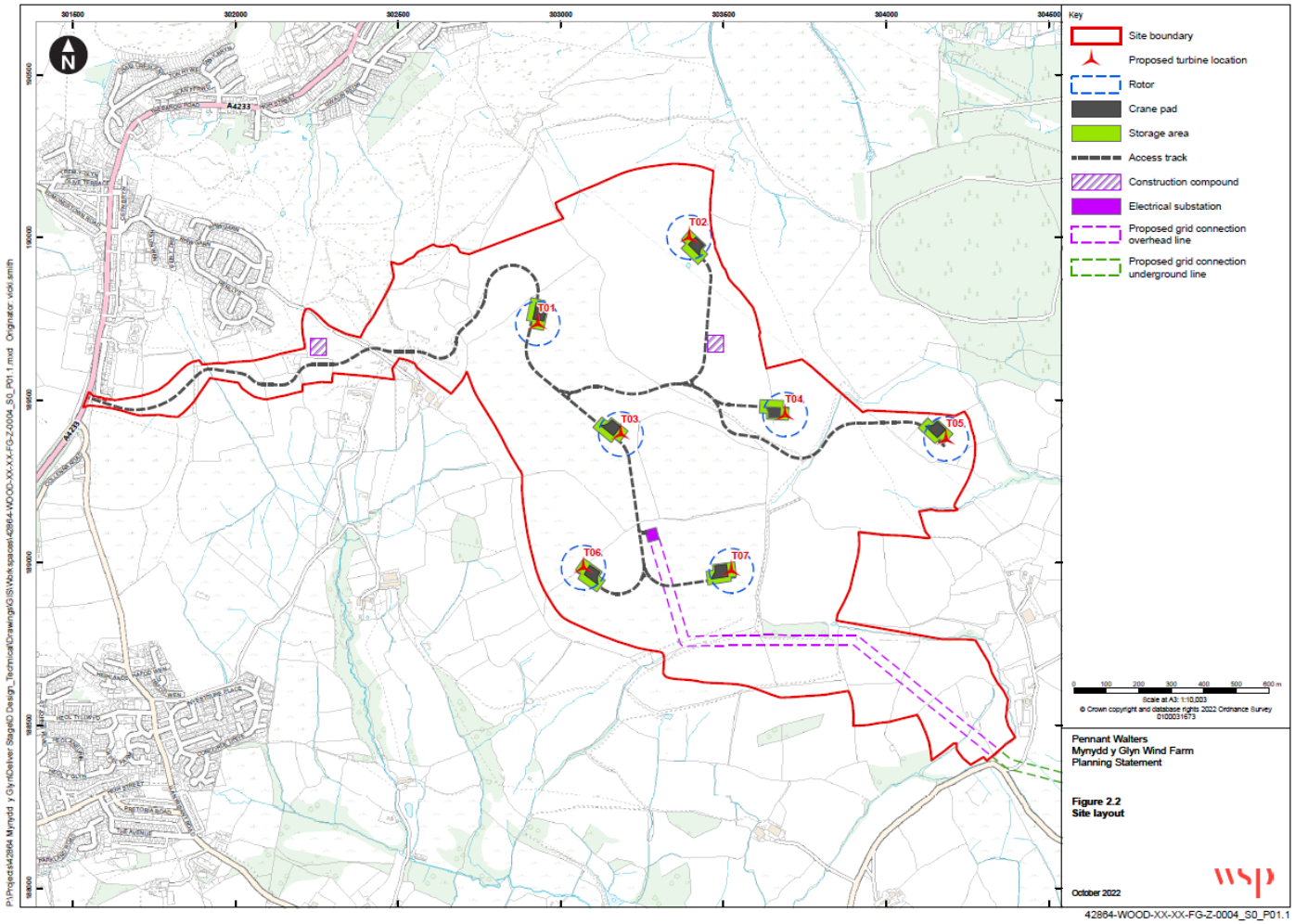
- substation and control building;
- temporary construction compound, including temporary site offices;
- crane pads at each turbine location;
- turbine foundations, laydown and storage areas
- underground power cables linking the turbines and the on-site substation;
- internal access tracks;
- new access from the A4233;
- an overhead line section of a longer grid connection (the remainder to be underground) between the site and an existing WPD substation; and
- other construction enabling works.

2.3.2 The layout of the site is contained in **Figure 2.2**.

2.3.3 A full description is provided in Draft ES **Chapter 4: Description of the Proposed Development**.

[1] The Draft Es considers candidate turbines with a lower output of 3.45MW.

Figure 2.2 Site Layout



2.4 Planning history

2.4.1 Of relevance to the application is the application submitted by the applicant for the installation of a 90m high anemometer mast for a temporary period of up to 3 years (Application reference 22/0493/10) which was approved on 5 August 2022. The only other application which includes part of the site subject to this DNS application is Application reference 17/0119/10 which is an application for a rural enterprise dwelling, the access track to which would cross the access track proposed for the wind farm.

2.5 Environmental Impact Assessment (EIA)

2.5.1 Under Regulation 4A of The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) (Amendment) Regulations 2016 consent is required from the Welsh Ministers for the construction and operation of all energy generation projects between 10MW and 350MW. The Proposed Development therefore qualifies as a DNS.

2.5.2 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) ('the EIA Regulations' from here on) apply to DNS applications. The Proposed Development falls with Schedule 2, paragraph 3(i) *("Installations for the harnessing of wind power for energy production (wind farms)"* due to exceeding the threshold for both the site area and hub height. For all Schedule 2 developments where it is decided that the particular development may have significant effects on the environment, whether on account of its nature, scale or location, an EIA is required.

2.5.3 A Scoping Report was prepared to identify the potentially significant environmental effects of the Proposed Development that needed to be assessed further and to outline the approach to undertaking the assessments of these effects and submitted to the Planning Inspectorate Wales (PINS)[2] in April 2021. The report enabled statutory and non-statutory organisations and others with an interest in the Proposed Development ('stakeholders') to comment on the proposed scope of the assessment.

2.5.4 Drawing on the consultation responses and previous and subsequent assessment work, the Draft ES reports the findings of an assessment of the potentially significant environmental effects of the Proposed Development. This reflects the requirement of the EIA Regulations for the Draft ES to discuss in depth only those effects that are likely to be significant. Although the grid connection will be subject to a separate planning application, the Draft ES considers the likely effects on the environmental receptors.

2.5.5 The Draft ES should be read in conjunction with this Draft Planning Statement, the Draft DAS and other application documents.

[2] On October 1st 2021 PINS Wales became the Planning and Environment Decisions Wales (PEDW) (or Penderfyniadau Cynllunio ac Amgylchedd Cymru)

3. Energy Policy

3.1 Background

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

3.2 International agreements

Paris Agreement 2015

3.2.1 The UNFCCC is the major international body responsible for managing climate change and carbon emissions. In 2015, parties to the UNFCCC adopted the Paris Agreement[3], the aims of which are stated as:

"*This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by: a) Holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change; and (b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production*."

3.2.2 The agreement sets targets for countries' greenhouse gas (GHG) emissions, but these are not legally binding or enforceable.

Glasgow Climate Pact 2021

3.2.3 The Conference of the Parties (COP 26) under the UNFCCC[4] held in Glasgow in November 2021, resulted in almost 200 countries agreeing on: the acceleration of action on climate change this decade to reduce emissions (mitigation); helping those already impacted by climate change (adaption); enabling countries to deliver on their climate goals (finance); and working together to deliver even greater action (collaboration). This agreement is in the form of the Glasgow Climate Pact which reaffirms the long-term goal to limit global warming to 1.5°C above pre-industrial levels and resolves to pursue efforts to achieve this, recognising that limiting global warming to 1.5°C "*requires rapid, deep and sustained reductions in global greenhouse gas emissions, including reducing global CO_2 emissions by 45% by 2030 relative to the 2010 level and to net zero around mid-century, as well as deep reductions in other greenhouse gases*".

[3] United Nations Framework Convention on Climate Change (2015). Paris Agreement. (Online) Available at: https://unfccc.int/sites/default/files/english_paris_agreement.pdf (Accessed October 2022).
[4] United Nations Framework Convention on Climate Change (2021). COP26 The Glasgow Climate Pact. (Online) available at: https://ukcop26.org/wp-content/uploads/2021/11/COP26-Presidency-Outcomes-The-Climate-Pact.pdf (Accessed October 2022).

3.3 UK energy legislation and policy

Energy Act (2008, 2011, 2013, 2016)

3.3.1 The Energy Act (2008)[5], implemented the legislative aspects of the 2007 Energy White Paper. The content of the Bill included strengthening the Renewables Obligation to drive greater and more rapid deployment of renewables in the UK. The Energy Act (2011)[6] sought to increase investment in energy efficiency whilst the Energy Act (2013)[7], put in place measures to reform the UK energy market to attract investment. The Energy Act (2016)[8] formally established the Oil and Gas Authority as a regulator for that sector whilst it signalled the closure of the Renewables Obligation for onshore wind.

Climate Change Act (2008)

3.3.2 The Climate Change Act 2008[9] set out the first binding UK target for a reduction in GHG emissions with a 80% reduction. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 came into force on 27 June 2019. This amended the legally binding target to reduce GHG emissions set in section 1 of the Climate Change Act 2008 from 80% to 100%, or net zero emissions. The Act requires that carbon budgets are set for five year periods – the latest update requires a 78% in emissions below 1990 levels by 2035.[10]

Net Zero Strategy: Build Back Greener (2021)

3.3.3 The Net Zero Strategy: Build Back Greener (BEIS, 2021)[11] provides the overarching UK wide strategy to reach the UK's target for net zero emissions in 2050. The strategy sets out a delivery pathway to achieve net zero in 2050 with polices and proposals to keep the UK on track for emission reduction targets to up to the sixth carbon budget covering the period 2033-2037. Amongst its policies, the strategy seeks to fully decarbonise the UK power system by 2035. Key to achieving this is the commitment to "*transform [the UK's] energy system away from fossil fuels to low carbon sources of energy, such as renewable electricity generated in the UK*" (page. 39).

British Energy Security Strategy (2022)

3.3.4 The Strategy[12] notes that external factors have led to significant increases in energy costs with implications for both householders and industry. It recognises that onshore wind is one of the cheapest forms of renewable power and states that in Wales, UK government

[5] UK Government (2008). Energy Act 2008. (Online) Available at: https://www.legislation.gov.uk/ukpga/2008/32/contents (Accessed October 2022).
[6] UK Government (2011). Energy Act 2011. (Online) Available at: https://www.legislation.gov.uk/ukpga/2011/16/contents (Accessed October 2022).
[7] UK Government (2013). Energy Act 2013. (Online) Available at: https://www.legislation.gov.uk/ukpga/2013/32/contents (Accessed October 2022).
[8] UK Government (2016). Energy Act 2016. (Online) Available at: https://www.legislation.gov.uk/ukpga/2016/20/contents (Accessed October 2022).
[9] UK Government (2008). Climate Change Act 2008. (Online) Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents (Accessed October 2022).
[10] UK Government (2009). The Carbon Budgets Order 2009 (Online) Available at: https://www.legislation.gov.uk/uksi/2009/1259/contents/made (Accessed October 2022).
[11] HM Government (2021). Net Zero Strategy: Build Back Greener. (Online)(Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf (Accessed October 2022).
[12] UK Government (2022). British Energy Security Strategy. (Online) Available at: https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy

will support the work of Welsh Government, Ofgem and networks to improve grid connections.

3.4 Welsh energy legislation and policy

3.4.1 The Welsh Government recognises the importance that energy plays to its economic, social, environmental and cultural wellbeing and the threats to that wellbeing from climate change. The Welsh Government has made very clear its commitment to renewable energy sources as a way of meeting commitments to reduce carbon emissions as demonstrated by declaration of a climate emergency in April 2019.

Energy Wales: A Low Carbon Transition (2012)

3.4.2 This strategy[13] states that it is the Welsh Government's ambition to create a sustainable, low carbon economy for Wales. The document highlights the importance of energy to Wales, stating it *'underpins our entire way of life,* but understands that the system is changing, and a low carbon economy will provide sustainable opportunities.

3.4.3 Total electricity generation in Wales has decreased as a result of decreased generation from coal and nuclear. Growth in renewable generation from 2.9% in 2004 to 5.1% in 2010 has helped negate the fall in generation from nuclear. It states Wales has significant onshore and offshore potential in wind resources and other low carbon resources therefore it is well placed to take advantage of a low carbon economy.

3.4.4 The Welsh Government wants to provide leadership on the energy agenda in Wales. It aims to improve a number of areas to ensure the energy agenda progresses to a more low carbon format. This includes unlocking the energy in the sea, energy efficiency, delivering through an energy programme, implementing 21st century energy infrastructure and improving the planning and consent regime.

3.4.5 Energy Wales: A Low Carbon Transition Delivery Plan (2014, updated 2019) sets out three key priorities for the future:

- providing leadership to ensure that Wales has a clear and consistent framework for investors, regulators and decision makers, and the infrastructure, coordination and stability needed to ensure that Wales is a great place to do business;
- maximising benefit for Wales in terms of jobs and wider economic benefit at every stage of development and operation whilst also ensuring that our communities derive long term benefits; and
- acting now for Wales' long term energy future through support for innovation, research, development, and commercialisation in the areas that offer the greatest potential for long-term benefit for Wales.

Wellbeing of Future Generations (Wales) Act 2015

3.4.6 This Act[14] places a duty on public bodies to carry out sustainable development and provides a definition. The Act defines sustainable development as "*The process of*

[13] Welsh Government (2012). Energy Wales: A Low Carbon Transition. (Online) Available at: https://gov.wales/sites/default/files/publications/2019-07/energy-wales-a-low-carbon-transition.pdf (Accessed October 2022).
[14] UK Government (2015). Well-being of Future Generations (Wales) Act 2015. (Online) Available at: https://www.futuregenerations.wales/wp-content/uploads/2017/02/150623-guide-to-the-fg-act-en.pdf (Accessed October 2022).

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." The Act also puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. The wellbeing goals are:

- a prosperous Wales;
- a resilient Wales;
- a healthier Wales;
- a more equal Wales;
- a Wales of cohesive communities;
- a Wales of vibrant culture and thriving Welsh language; and
- a globally responsible Wales.

3.4.7 The wellbeing goals act together to ensure outcomes across economic, environmental, social and cultural sustainability strands. The achievement of the wellbeing goals informs all policy and decision making. The wellbeing goal – achieving a prosperous Wales – specifically recognises the benefits of developing a low carbon society that recognises the limits of the environment and uses resources efficiently.

Environment (Wales) Act 2016

3.4.8 The Environment (Wales) Act 2016 (as amended)[15] places a duty on the Welsh Ministers to reduce GHG emissions in Wales by at least 100% in 2050[16]. The target of net zero emissions (rather than 80% as originally stated in the Act) reflects the Welsh Government's acceptance of the independent Climate Change Committee's (CCC) recommendation[17] that Wales could achieve a net zero reduction in emissions, which had previously been considered unfeasible. The Environment (Wales) Act 2016 (as amended) requires Ministers to set a series of interim targets and five-year carbon budgets to achieve the 2050 target. For 2021-26 this stands at 37% reduction compared to the baseline and for 2026-30 this is set at an average of 58% reduction[18].

Energy Generation Targets for Wales: Statement to Assembly Members (2017)

3.4.9 In September 2017, the Welsh Government Cabinet Secretary for Environment and Rural Affairs announced to the Welsh Assembly that the Welsh Government was setting a target for Wales to generate 70% of its electricity consumption from renewable energy by 2030 and a target for 1GW of renewable electricity capacity in Wales to be locally owned by 2030[19]. Additionally, it set a target for all renewable energy projects to have an element of local ownership.

[15] UK Government (2016). Environment (Wales) Act 2016. (Online) Available at: https://www.legislation.gov.uk/anaw/2016/3/contents (Accessed October 2022).
[16] The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021 changed the statutory target within the Environment Act from 80% to 100% and came into force on 12 March 2021.
[17] Climate Change Committee's (2020) The path to Net Zero and progress on reducing emissions in Wales.
[18] The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021 amended the 2021-2025 carbon budget from an average reduction of 33% to 37% lower than the baseline and came into force on 19 March 2021. The regulations set the carbon budget for the 2026-2030 period and limit to an average of 58% lower than the baseline.
[19] Welsh Government (2017) Lesley Griffiths high on ambition for clean energy. (Online) Available at: https://gov.wales/lesley-griffiths-high-ambition-clean-energy (Accessed October 2022).

Policy Statement: Local Ownership of Energy Generation in Wales – Benefitting Wales Today and for Future Generations (2020)

3.4.10 This policy statement[20] places considerable importance on moving from polluting energy generating technologies to renewables. It also identifies that Wales has made considerable and impressive gains in ensuring energy generating facilities have some form of public ownership, contributing to local economies considerably more than traditional ownership methods.

3.4.11 The Policy Statement clarifies the definition of local ownership as "*energy installations, located in Wales, which are owned by one or more individuals or organisations wholly owned and based in Wales, or organisations whose principal headquarters are located in Wales. This includes the following categories: Businesses; Farms and estates; Households and other domestic scale generation; Local Authorities; Other public sector organisations; Registered Social Landlords; Third sector organisations including social enterprises and charities, their subsidiaries, trading arms and special purpose vehicles*."

Programme for Government (2021)

3.4.12 The Welsh Government's *Programme for Government* (June 2021)[21] seeks to ensure that tackling the climate and nature emergencies is at the heart of Welsh Government activity. One of the ten well-being objectives is "*Embed our response to the climate and nature emergency in everything we do*."

Net Zero Wales (2021)

3.4.13 The Environment (Wales) Act 2016 (as amended) requires the publication of a report setting out policies and proposals for each carbon budget period. In October 2021 the Welsh Government published Net Zero Wales[22]. This sets out a large number of policies and proposals to ensure that Wales meets the required average reduction of 37%[23] in GHG emissions against the baseline for Carbon Budget 2. The Plan reinforces the importance of delivering energy generation from renewable sources to meet the energy needs of Wales.

[20] Welsh Government (2020a). Policy Statement: Local Ownership of Energy Generation in Wales – Benefitting Wales Today and for Future Generations. (Online) Available at: https://gov.wales/sites/default/files/publications/2020-02/policy-statement-local-ownership-of-energy-generation-in-wales.pdf (Accessed October 2022).
[21] Welsh Government (2021). Programme for Government: Well-being Statement. (Online) Available at: https://gov.wales/sites/default/files/publications/2021-06/programme-for-government-2021-to-2026-well-being-statement.pdf (Accessed October 2022).
[22] Welsh Government (2021). Net Zero Wales Carbon Budget 2 (2021-25). (Online) Available at: https://gov.wales/sites/default/files/publications/2021-10/net-zero-wales-carbon-budget-2-2021-25.pdf (Accessed October 2022).
[23] The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021 amending the 2021-2025 carbon budget from an average reduction of 33% to 37% lower than the baseline came into force on 19 March 2021. The regulations set the carbon budget for the 2026-2030 period and limit to an average of 58% lower than the baseline.

4. Planning Policy Review

4.1 Background

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

4.2 UK planning policy

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

Overarching National Policy Statement for Energy (EN-1) (2011)

4.2.2 EN-1 was enacted in 2011 and sets out the national policy on Nationally Significant Infrastructure Projects (NSIP). It reiterates Government policy on energy and energy infrastructure, setting out the roadmap to 2050 and emphasising the urgency with which global emissions must start to fall and the need for the UK to move away from a high carbon energy generation mix. At paragraph 3.4.5 the NPS states "*It is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable energy electricity generation projects is therefore urgent*."

4.2.3 Section 3.4 sets out the role of renewable energy as envisaged by Government. EN-1 also provides advice on 'good design'. Paragraph 4.5.3 states that applicants may have opportunities to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. The NPS includes a reference that it can be a material consideration in the determination of planning applications.

Draft National Policy Statement for Energy (EN-1) (2021)

4.2.4 The Draft NPS EN-1 was published for consultation in September 2021. In Section 2 the Draft NPS refers to the target of net zero in 2050 and a 78% reduction in GHG emissions by 2035. This reflects the latest legislation. The draft also includes revisions that recognise that decisions on renewable energy developments up to 350MW and all onshore wind (above 10MW) are devolved within Wales whilst onshore wind is removed from the NSIP regime. Other changes include incorporation of references to the consideration biodiversity net gain in NSIP.

National Policy Statement for Renewable Energy Infrastructure (EN-3) (2011)

4.2.5 The 2011 NPS provides policy on a range of renewable energy technologies and their potential for likely significant effects. With regard to onshore wind, it notes at 2.7.1 that:

"Onshore wind farms are the most established large-scale source of renewable energy in the UK. Onshore wind farms will continue to play an important role in meeting renewable energy targets"

4.2.6 With specific relevance to Landscape and Visual issues, it notes at 2.7.48 that "*Modern onshore wind turbines that are used in commercial wind farms are large structures and there will always be significant landscape and visual effects from their construction and operation for a number of kilometres around a site*."

4.2.7 It goes on to state that the arrangement of turbines should be designed to minimise effects while meeting technical and operational siting requirements. However, recognition is also given to the potentially significant changes which could reduce electrical output from a resulting reduction in scale.

Draft National Policy Statement for Energy (EN-3) (2021)

4.2.8 A draft NPS for Energy (EN-3) was published for consultation in September 2021. The draft removes reference to onshore wind in line with the Infrastructure Planning (Onshore Wind Generating Stations) Order 2016 which removed all onshore wind generating stations in England and Wales from the definition of nationally significant energy generating stations. In England such development is to be considered through TCPA applications.

4.2.9 As established elsewhere in this Planning Statement, the Welsh Government sees onshore wind as a key element of the infrastructure required in Wales and schemes over 10MW are considered to be of a scale to be nationally significant. This is embedded in *Future Wales: the National Plan* and *Planning Policy Wales 11*. In decision making it is considered that no weight should be given to the fact that the draft NPS removes references to onshore wind.

4.3 Welsh national policy

Future Wales: The National Plan 2040

4.3.1 *Future Wales Future Wales: The National Plan 2040* (2021) (referred to as Future Wales from here on) was published by the Welsh Government on 24th February 2021. Future Wales provides a national framework to inform planning decision making and the development of strategic regional level plans until 2040 and has development plan status. It is the plan which DNS applications are to be assessed against under s.38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA).

4.3.2 The intention of Future Wales is to provide a clear, long term spatial direction for Government policy, action and investment in Wales. It sets out a framework for addressing key national priorities through the planning system, inclusive of decarbonisation. It states (page. 46):

"Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel."

4.3.3 Future Wales sets out 11 Outcomes to be achieved through the planning system. Outcome 11: A Wales where people live in places which are decarbonised and climate-resilient states that: "*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*."

4.3.4 Future Wales includes two policies that provide the strategic and detailed policy wording for consideration of renewable and low carbon energy developments:

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

Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure

4.3.5 Policy 17 states that "*The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs*" whilst decision makers are required to give "*significant weight"* to the need to meet international commitments and Wales' target to generate 70% of energy form renewables by 2030.

4.3.6 Future Wales includes ten Pre-Assessed Areas (PAA) for Wind Energy. These areas have been assessed by Welsh Government and are identified to provide certainty where, in principle, large scale wind farm developments would be acceptable. On publication of Future Wales, Technical Advice Note (TAN) 8: Planning for Renewable Energy (2005) including the approach to Strategic Search Areas (SSA) was revoked.

4.3.7 The Proposed Development is located outside a PAA for Wind Energy. As such Policy 18 is applicable.

Policy 18 - Renewable and Low Carbon Energy Developments of National Significance

4.3.8 As a development qualifying as a Development of National Significance, Policy 18 sets out the following criteria that are applicable to the Proposed Development:

- *"1. Outside of the PAAs for wind development, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly the setting of National Parks and Areas of Outstanding Natural Beauty);*
- *2. there are no unacceptable adverse visual impacts on nearby communities and individuals;*
- *3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);*
- *4. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;*
- *5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;*
- *6. there are no unacceptable adverse impacts on statutorily protected built heritage assets;*
- *7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;*
- *8. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);*

- *9. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;*
- *10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;*
- *11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration; and*
- *The cumulative impacts of existing and consented renewable energy schemes should also be considered*."

4.3.9 The supporting text to Policies 17 and 18 explains the importance which Welsh Government places in protecting National Parks and AONBs from large-scale wind (and solar), which it considers to be unsuitable. The same paragraph does however go on to explain that outside these areas a positive policy framework exists. Similarly, the following paragraph states that a positive policy framework for onshore wind exists in areas outside of PAA, subject to Policy 18.

Policy 33 – National Growth Area – Cardiff, Newport and the Valleys

4.3.10 Within Policy 33 the overall strategic view for development in the South East area is set out. The South East includes the area covered by RCTCBC. Amongst other provisions, the Policy sets out that: "*The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities*."

Planning Policy Wales Edition 11 (2021)

4.3.11 Planning Policy Wales 11 (PPW11) sets out the land use planning policies for Wales. PPW provides national policy, and is material to the consideration of planning applications, but does not form part of the statutory development plan. The latest edition was adopted in February 2021 to coincide with the publication of Future Wales. PPW11 promotes sustainable development, renewable energy and tackling climate change. Linked to the seven well-being goals of Wellbeing of Future Generations Act. It sets out five key Planning Principles (page. 17) to achieve the right development in the right place:

- **Growing our economy in a sustainable manner** – the planning system should enable development which contributes to long term economic well-being, making 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;
- **Facilitating accessible and healthy environments** - Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society;
- **Creating & sustaining communities** - The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others; and

- **Maximising environmental protection and limiting environmental impact** - Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest.

4.3.12 PPW11 includes reference to the climate emergency declared by the Welsh Government in 2019 and the Environment Act (Wales) 2016 targets to achieve 80% reduction in emissions by 2050 and evidence that Wales can achieve a 95% reduction. As noted above, following the publication of PPW11, more recent changes in the legal requirement require a reduction of GHG emissions of at least 100% in 2050[24].

4.3.13 PPW11 notes at para 3.30 that:

"*The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes*."

4.3.14 Mitigating and adapting to the effects of climate change is central to PPW, and the planning system it seeks to promote, enabling Wales to meet the needs of present and future generations (para 3.33):

"Climate change is a global challenge, with impacts felt at the local level presenting a significant risk to people, property, infrastructure and natural resources. We need to plan for these impacts, reducing the vulnerability of our natural resources and build an environment which can adapt to climate change. The planning system plays a significant role in managing this risk."

4.3.15 Section Paragraph 5.7.7 "*The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance*." It sets out eight bullet points for the planning system to achieve:

- "*Integrate development with the provision of additional electricity grid network infrastructure;*
- *Optimise energy storage;*
- *Facilitate the integration of sustainable building design principles in new development;*
- *Optimise the location of new developments to allow for efficient use of resources;*
- *Maximise renewable and low carbon energy generation;*
- *Maximise the use of local energy sources, such as district heating networks;*
- *Minimise the carbon impact of other energy generation; and*
- *Move away from the extraction of energy minerals, the burning of which is carbon intensive*."

4.3.16 PPW11 reaffirms the Welsh Government targets to achieve 70% of its electricity consumption by renewables, one GW of capacity to be locally owned by 2030; and for new energy projects to have at least some local ownership (para 5.7.14) and that "*The planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings*" (para 5.7.15).

[24] The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021 which change the statutory target within the Environment Act from 80% to 100% came into force on 19 March 2021.

4.3.17 PPW11 states that Wales has abundant wind power resource and the Welsh Government sees wind as a key renewable energy resource. At para 5.9.17 PPW reaffirms the approach in Future Wales: "*For large scale wind developments, [Future Wales] identifies Pre-Assessed Areas where the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large scale wind energy development (including repowering) in these areas, subject to other criteria contained within the policy*."

4.3.18 PPW also includes detailed advice at para 5.9.24 on local involvement and community benefit, reflecting the Welsh Government advice that it expects all new renewable energy projects in Wales to have at least an element of local ownership.

Technical Advice Notes

4.3.19 The Welsh Government has produced a number of Technical Advice Notes (TAN) which supplement PPW11. There are a number of guidance notes that are applicable to the development of onshore wind farms.

Technical Advice Note 5: Nature Conservation and Planning (2009)

4.3.20 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation within Wales. It sets out the key principles of planning for nature conservation for both LDPs and when deciding planning applications. These include:

- being mindful of the principles of sustainable development, environmental limits, the precautionary principle;
- contributing to the protection and improvement of the environment;
- promoting the conservation and enhancement of statutorily designated areas and undeveloped coast;
- ensuring that appropriate weight is attached to designated sites of international, national and local importance;
- protecting wildlife and natural features in the wider environment;
- ensuring that all material considerations are taken into account and decisions are informed by adequate information about the potential effects of development on nature conservation;
- ensuring that the range and population of protected species is sustained; and
- avoiding harm to nature conservation, minimising unavoidable harm by mitigation measures, offsetting residual harm by compensation measures and looking for new opportunities to enhance nature conservation.

Technical Advice Note 6: Planning for Sustainable Rural Communities (2010)

4.3.21 TAN 6 states that planning authorities should support the diversification of the rural economy and that the planning system has a key role to play in supporting the delivery of sustainable rural communities. It notes the need to respond to the challenges posed by climate change and identifies that one method which can contribute to this is renewable energy generation, particularly using local renewable sources. In paragraph 3.7.2, TAN 6 considers farm diversification and notes the range of activities which can be sustainably located on farms and notes that the production of renewable energy is likely to be an appropriate use.

Technical Advice Note 11: Noise (1997)

4.3.22 TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise, without placing unreasonable burdens on applicants. Local planning authorities must ensure that noise generating development do not cause an unacceptable degree of disturbance.

Technical Advice Note 12: Design (2016)

4.3.23 The TAN says that good design can be facilitated. There are a number of key objectives in relation to design:

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

Technical Advice Note 19: Telecommunications (2002)

4.3.24 This TAN deals with both the creation of telecommunication links and also the potential for radio interference from Proposed Development. It notes that large prominent structures such as wind farms can cause disruption to television and other telecommunications services due to the physical obstruction. It puts the onus on local planning authorities to satisfy themselves that the potential for interference has been fully taken into account in the siting and design of such developments, and appropriate mitigation built into the scheme if necessary.

Technical Advice Note 23: Economic Development (2014)

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

Technical Advice Note 24: The Historic Environment (2017)

4.3.26 TAN 24 provides guidance on how the planning system should consider the historic environment during development plan preparation and decision making on planning applications.

4.4 The Local Development Plan

4.4.1 As described in Section 4.3 above, Future Wales forms the highest tier of the Development Plan and contains the primary planning policies against which DNS are determined. This section of the Planning Statement sets out the key LDP policies relevant to the consideration of the Proposed Development.

4.4.2 The Proposed Development is located within the administrative area of RCTCBC. The local planning authority adopted its LDP in March 2011. The document was intended to apply up to 2021 although it remains the current plan subject to the finalisation and adoption of the Council's proposed Revised Local development Plan 2022-2037. The following policies are considered to be of particular relevance to the Proposed Development:

- CS1 Development in the North;
- CS2 Development in the South;
- AW7 Protection and Enhancement of the Built Environment;
- AW8 Protection and Enhancement of the Natural Environment;
- AW10 Environmental Protection and Public Health;
- AW12 Renewable and Non-Renewable Energy;
- AW13 Large Wind Farm Development;
- AW14 Safeguarding of Minerals;
- SSA 22 Green Wedge; and
- SSA 23 Special Landscape Areas

4.5 Other local planning considerations

Supplementary Planning Guidance

The Historic Built Environment

4.5.1 The document lists the number of historic assets to be found within RCTCBC extending from scheduled ancient monuments through to conservation areas, historic parks and gardens and historic landscapes (with Mynydd y Glyn lying to the south of the Rhondda Historic landscape Area). Guidance is provided on how to approach works and alterations to listed buildings and other historic structures, including the use of appropriate materials. With regard to archaeology paragraph 4.3.2 states that where this is identified a being present that consideration will be given to the extent, nature, condition and importance of any such site and that sufficient information should be made available to determine the impact of the proposed development on the archaeological resource. Where appropriate conditions will be placed to ensure a resource is sufficiently surveyed, preserved and recorded.

Nature Conservation

4.5.2 The document describes the different types of protected sites from those designated at a European level through to Sites of Importance for Nature Conservations (SINC) which together with Regionally Important Geological Sites (RIGS) which are designated as part of the LDP. The document also describes the importance of ecological connectivity and habitat fragmentation as important wildlife conservation issues and recognises that the effects of climate change could be to cause an increase in local extensions among small isolated populations. Guidance is also provided on protected species including those protected at a European level and those protected by UK legislation. The document also references Welsh Government's list of habitats and species of principal importance in

Wales (Section 42 of the Countryside and Rights of Way Act 2000) and the Local Biodiversity Action Plan for Rhondda Cynon Taf.

4.5.3 Planning objectives and requirements relative to nature conservation include a general principle that a developer should provide sufficient information to inform a decision about the nature conservation value of a site and that development should not lead to a net loss of biodiversity, should protect ecosystems and where possible contribute to biodiversity enhancement. Specific guidance is provided with regard to the design of wind farms which states that developers should survey and map habitat and features present on site and consider alternative designs to avoid or if unavoidable, mitigate impacts. Where mitigation is considered insufficient, information should be provided on how effects will be compensated. The document requires proposals for the long-term management and monitoring of impacts.

Planning Obligations

4.5.4 The guidance references renewables only in the content of potential initiatives which could be funded via a planning obligation (as reference in Policy AW 4 Community Infrastructure and Planning Obligations) but does reference the on-site provision of environment, Landscape and biodiversity as generally appropriate for S106. In this content the document states that obligations will be employed where mitigation, enhancement or compensation require long term or complex commitment or where a financial contribution and/or transfer of land is involved. In addition, obligations can be employed to secure long term management and monitoring of schemes.

Emerging Local Development Plan

4.5.5 The County Borough recognises that the adopted Local development Plan was adopted in 2011and concluded that there was a need to prepare a Revised LDP in November 2019. The decision was approved by Welsh Government in September 2020. The revised LDP 2020-2030 is in preparation.

4.6 Planning considerations

Assessment of compliance with national policy

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

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

Future Wales is the most up-to-date development plan and in accordance with the latest PPW. Therefore, an assessment of the Proposed Development against the policies of Future Wales is necessary in order to understand the extent to which the Proposed Development is compliant with policy. However, in reaching a conclusion upon the compliance or otherwise with Future Wales it is considered necessary to also set it within the policy context of PPW.

Benefits of the Proposed Development

4.6.2 Future Wales sets out two polices concerned with the topic of renewable and low carbon energy Policy 17 and Policy 18. The former policy establishes the Welsh Government's strong support for the principle of delivering renewable and low carbon energy from all technologies and at all scales and requires decision-makers to give significant weight to the need to meet Wales' international commitments and the target to meet 70% of consumed electricity by 2030.

4.6.3 Policy 17 requires that "*Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities*."

4.6.4 The Environment (Wales) Act 2016 (as amended) places a duty on the Welsh Ministers to reduce GHG emissions in Wales by at least 100% in 205025. As demonstrated above, under Policy 17 of Future Wales, "significant weight" must be given by decision makers to the need to meet Wales' international commitments on climate change and the target to meet 70% of consumed energy by renewable sources by 2030. PPW (para 5.7.15) states that "The planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings" whilst PPW (para 5.7.7) is also clear that "The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance." Therefore, the benefits of the Proposed Development in this regard are crucial to meeting the national policy framework requirements.

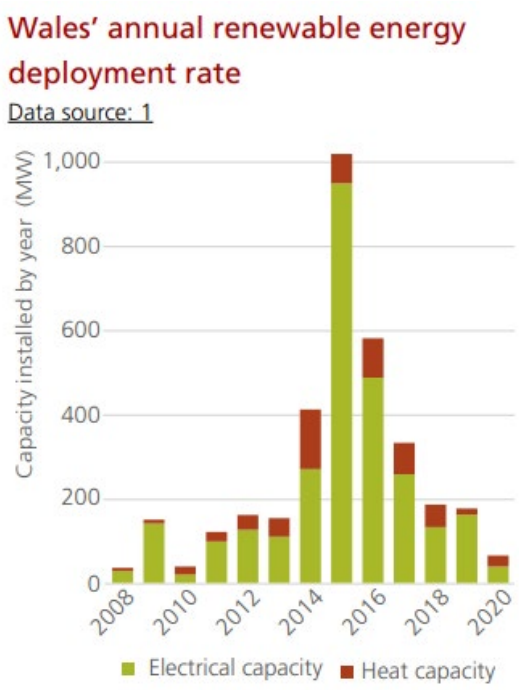
4.6.5 It is recognised that the 70% target is to be achieved through increasing renewable energy generation alongside a reduction in energy consumption through improved efficiency. Therefore, it is not solely related to installed capacity of renewable infrastructure. However, Future Wales is clear that Ministers have considered alternatives to large scale electricity generating infrastructure (including energy efficiency) and they are not considered to be able meet the targets alone. Future Wales is clear that "The Welsh Ministers have considered alternatives to the need for new large-scale electricity generation infrastructure, including building-mounted installations and energy efficiency measures. Although we believe that these measures have an important part to play in meeting our energy, decarbonisation and climate change targets, they will not enable us to meet these objectives on their own." (Welsh Government, 2021a: 97).

4.6.6 Therefore, to address the climate emergency declared by the Welsh Government in 2019 through the planning system's key role (as per PPW para 3.3.0), the delivery of nationally significant renewable energy projects under the DNS regime is central to achieving the required response. This is synthesised through Future Wales Policy 17 which is clear that "The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs."

4.6.7 The Proposed Development would see the delivery of a combined rated output of up to up to 30MW of electrical power. The Welsh Government's Energy Generation in Wales Report 2020[26] published in May 2022 assessed the percentage in 2020 to be at 56% (somewhat below the target of 70% and an increase from 51% recorded for the previous year of 2019). The Report (page. 7) notes with the percentage increase is more a result in the reduction of electricity demand recognising that the year saw a small increase in

[25] The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021 changed the statutory target within the Environment Act from 80% to 100% and came into force on 12 March 2021.
[26] Welsh Government (2022). Energy generation in Wales 2020. (Online) Available at: https://gov.wales/sites/default/files/publications/2022-06/energy-generation-in-wales-2020.pdf (Accessed September 2022).

renewable electricity deployment (indeed the report on page 5 records the year as experiencing the lowest annual deployment rate since 2010).



4.6.8 With regard to the 70% target the report states in view of the factors referenced above concerning the reduction in demand, that the 'relative' surge in 2020 may be temporary. The report goes on to reference planning assumptions that electricity demand will increase as a result of increasing electricity consumption particularly in the heat and transport sectors.

4.6.9 Page 7 continues that "*..there remain significant challenges to deploying renewable generation at a pace required to meet the 70% target by 2030*." These challenges are listed as securing price support, gaining planning permission and securing a grid connection with a recognition that projects are struggling to develop sustainable, subsidy-free business models that accommodate the necessary network reinforcements.

4.6.10 The report concludes on page 8 that the 70% renewable electricity target is just the first step in renewable energy development in Wales, as Wales aims to generate renewable energy to at least meet its consumption. Meeting the 70% target therefore should therefore only be seen as a signpost on the way to 100% renewable energy generation.

4.6.11 Whilst the Applicant is seeking to consent a wind farm of upto 30MW whilst the Draft ES has considered a candidate turbine of 3.45MW, meaning a maximum annual generation from that machine of 24.2MW which is equivalent to the domestic needs of approximately 15,376 average households[27,28]. This domestic equivalent would obviously be higher if seven turbines generating upto 30MW were to be selected. The Proposed Development would therefore demonstrably help support an increase in renewable generation; contributing to the achievement of Welsh Government targets. Furthermore, the Applicant has secured a connection offer agreement from WPD and seeks as part of this application to consent the overhead element of the connection. A firm and binding connection offer

[27] Assuming a rated capacity of 24.2MW (based on 3.45MW for each turbine) and load factor of 28.2% which takes into account the intermittent nature of the wind, the availability of the wind turbines and array losses.
[28] Homes Equivalent = rated capacity of wind farm (kW) x average load factor for wind x number of hours in a year / average household energy consumption (MWh)

means that the Proposed Development addresses the challenge of securing a grid connection.

4.6.12 PPW (Welsh Government, 2021b: para 5.7.6) is clear that "*The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts*". The balance is weighed between maximising the benefits to the economy and communities and minimising the potential environmental and social impacts. Effectively this is reached when taking into consideration the policy imperatives of Policy 17 and Policy 18 of Future Wales.

4.6.13 In addition to the positive benefits for addressing climate change and enhancing the supply of renewables, the Proposed Development would see economic benefits for the area. The Proposed Development would include the provision of approximately 41 FTE (full time equivalent) jobs during construction and 4 FTE during operation. It is estimated that the expenditure in Wales associated with the construction phase would total £9.6m whilst for the operation phase would equate to £0.7m per annum.[29] This level of investment would support the outcomes that Policy 33 of Future Wales which seeks to deliver investment in the South East region.

4.6.14 The Applicant (Pennant Walters) is a business registered in Wales, and therefore meets the Welsh Government's definition of local ownership (Welsh Government, 2020a). The Proposed Development would therefore contribute to the Welsh Government's local ownership of renewable energy target and support PPW paras 5.7.14 and 5.9.24.

Impacts of the Proposed Development

Landscape and the PPA

4.6.15 Future Wales requires decision-makers to give significant weight to the need to meet amongst other objectives, Wales' target to consume 70% of electricity by renewable means by 2030. It states that the landscapes within PAA are capable of accommodating development (onshore wind) in an acceptable way and provides a presumption in favour of large-scale wind energy development in the PAA subject to the criteria in Policy 18. It also states that applications for large-scale wind energy development will not be permitted in National Parks and Areas of Outstanding Natural Beauty and that all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment.

4.6.16 The Proposed Development is not within a PAA, however the Applicant considers that it is complaint with Policy 18 in that it does not have an unacceptable impact upon the landscape as will be demonstrated within this section of the Planning Statement. With regard to its location outside of the PAA, it is the Applicant's opinion that the spatial approach to onshore wind set out in Future Wales has significant limitations because of the high-level approach to constraints mapping which was adopted, an issue consistently set out by the sector/RenewableUK Cymru. This is evidenced by the work undertaken by RenewableUK Cymru which involved detailed analysis of the PAAs in Wales and concluded that only ~5% is suitable for onshore wind and are theoretically deliverable once suitable constraints are applied and operational wind farms have been excluded. The Applicant therefore concluded, consistent with Policy 17 and 18, that the PAAs are only a starting point for large-scale wind energy development and that consistent with these policies that land outside of PAAs can be appropriate for large scale wind energy, subject to Policy 18.

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

4.6.17 With regard to PAA 9, which is the closest to the Proposed Development, areas of land are included which are considered unfeasible and unviable such as the valleys where there is a lack of wind resource and where there is proximity to local centres of population (Tonyrefail, Trebanog and farmsteads) with potential proximity issues such as noise, visual and shadow flicker. Therefore, to reduce the potential for impacts, the Applicant concluded that the Proposed Development would need to be located further north than the PAA boundary to an area of higher ground where there is potential for better wind generation and a greater distance to population centres.

4.6.18 Policy 18 permits proposals for renewable and low carbon energy projects subject to Policy 17 and to eleven criteria. Criterion 1 concerns effects upon the landscape and states that "*outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)*").

4.6.19 The landscape impacts have been assessed within Draft ES Chapter 6: Landscape and Visual Impact Assessment (LVIA). The LVIA considers that there are no direct impacts on the nationally designated Brecon Beacons National Park (BBNP). An assessment on potential indirect effects on the special qualities for which the BBNP is designated (based on composite Landscape Character Areas (LCAs)) has been undertaken. The LVIA has assessed that there would be no significant landscape effects upon the distinctive characteristics and character of the LCAs within the BBNP. There are no AONBs within the study area identified within the LVIA.

4.6.20 The likely effects on locally designated Special Landscape Areas (SLA) have also been assessed in the LVIA. The LVIA notes for the host SLA, the Mynydd y Glyn and Nant Muchudd Basin SLA that *"The small irregular field pattern within the Nant Muchudd Basin would be maintained although may become dominated by the turbines due to their scale and proximity"*, and that *"The un-industrialised nature of the landscape is also a characteristic which would be altered by the Proposed Development whilst the proposed turbines would also be clearly visible in the views from the settlements referenced in the primary landscape qualities as featuring Mynydd y Glyn as a backdrop in outwards views".* Direct effects have therefore been assessed with the level of effect identified as ranging from Major and Significant to None and Not Significant.

4.6.21 Indirect effects have also been assessed for the SLAs entirely or partly located within 10km of the Proposed Development. The following landscape effects are assessed and conclusions drawn:

- Llwyncelyn Slopes SLA – effects would be significant in the eastern part of the SLA; and
- Cwm Clydach SLA– effect would be significant in the southern parts of the SLA.

4.6.22 The Proposed Development has been designed so as to minimise the effects on these local landscape designations through the use of non-reflective pale grey on the rotor blades and upper towers. Whilst significant effects have been identified, these are inherent given the type of development proposed (ref: NPS EN-1). The majority of PAAs include land designated as SLAs such that it is clear that Welsh Government does not see such local designations as being a barrier to large-scale wind farm development. Whilst a matter to be included within the planning balance, the presence of significant effects upon local landscape designations is not considered to be fundamental to the consideration of the application.

4.6.23 The LVIA also assesses cumulative landscape effects which is concerned with the evaluation of the effects that could be generated were the Proposed Development to become operational along with some or all of the other wind energy developments that are

either already operational, have been consented or are proposed i.e. planning application or scoping opinion, within an extended 28 km radius cumulative study area. The focus of the assessment is to identify which, if any, of the landscape or visual receptors that would not experience significant effects as a result of the introduction of the Proposed Development alone, may experience significant effects as a result of the incremental contribution of the Proposed Development.

4.6.24 The LVIA assesses the effects under two scenarios:

- Scenario One includes other operational (and under construction) and consented wind energy developments; and
- Scenario Two includes proposed wind energy developments (subject of a formal planning application or EIA Scoping Opinion). In reality, not all of these wind energy developments may be granted planning consent, and as such, the scenario represents a worst-case scenario that may never come to pass.

4.6.25 Under both Scenario One and Two, for both landscape and visual effects, the LVIA concludes that effects would not be significant. This includes for cumulative effects upon the Brecon Beacons National Park. In summary the reason for this lack of significant impacts is either the distance between schemes and/or the nature of topography with most settlements and communication routes (in the case of visual effects) being in the valley floors with limited views across the wider study area.

Policy 18 Criteria

4.6.26 Policy 18 sets out a range of criteria for DNS applications which inform consideration of impacts. The majority of the criteria (2, 4, 6, 7, 8, 9) refer to 'unacceptable adverse impacts' which implies that a planning judgement has to be made to determine acceptability (or otherwise) of any adverse impacts.

4.6.27 As demonstrated in **Table 4.1,** when taken as a whole, and the planning merits weighed, the Proposed Development accords with the criteria in Policy 18. (Criteria 1 has been considered above).

Table 4.1 Assessment against Future Wales Policy 18 requirements

Policy 18 criteria	Compliance
2. There are no unacceptable adverse visual impacts on nearby communities and individuals;	Draft ES Chapter 6 (LVIA) assesses the likely visual impacts of the Proposed Development. The LVIA assessment finds that there are likely significant visual effects on a range of receptors categorised as residential, communications links and recreational. The site is located on high ground with a number of relatively small, often linear settlements in the valleys which bound it. Areas within the following settlements could experience significant visual effects during the operational phase depending upon local topography, screening and orientation: • Trehafod; • Trebanog; • Ynyshr; • Wattstown; • Rhydyfelin; • Tynant and Beddau; • Llantrisant; • Tonyrefil; • Penhrhiwfer and Edmonstown; and

Policy 18 criteria	Compliance
	• Tonypandy. In addition, a number of national footpaths and cycle trails could also experience significant effects although it should be recognised that these routes are by their nature of considerable length such that it would often only be the stretches closets to the Proposed Development where significant effects would occur. These are therefore transitory in nature. There are no registered parks and gardens which would be affected significantly, two golf courses, open access land upon which the Proposed Development is located and a small number of highways would be significant although, as with the footpaths and cycle trails, effects upon highways such as the B4278 would be transitory as the viewer travels along the highway. Wind farms by their nature create visual effects and the role of the decision maker is to consider the extent to which these effects outweigh the positive benefits of the project such that the application could be considered unacceptable. Recognition should also be given to the fact that the ES assessment commonly considers views of wind turbines to be negative when the experience of the individual may often be more nuanced. Future Wales call for significant weight to be attached to the positive benefits of onshore wind. The significant effects identified within the Draft ES are those which could be anticipated as arising from a development of this kind and are not so significant or widespread as to outweigh the benefits which would derive from its operation.
3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features; for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);	Draft ES Chapter 8 examines the likely effects on internationally designated sites and features noting that there are two statutory designated biodiversity sites of international importance located within 10km of the Site boundary: Blackmill Woodlands SAC and Cardiff Beach Woodlands SAC. The former is an example of old sessile oak woods located 8.4km from the site and the latter one of the largest concentrations of beech forest in Wales which his 8.8km distant. Given the distance from the site and the qualifying features it is concluded that significant effects arising from the proposed development could not occur and both sites are scoped from the assessment. Draft ES Chapter 9 identifies internationally sites designated for their ornithological value. There are two within 20km of the site; the Severn Estuary Special Protection Area and Severn Estuary Ramsar Site. However, species for which these sites are designated were not recorded in site surveys and given the distance between the Proposed Development and the two European Sites and the absence of any notified species, it is concluded that the Proposed Development does not provide “Functional Habitat” for any of the notified species and that there would be no observable impacts on the SPA or Ramsar site.
4. There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated),	Draft Chapter 8 considers the impacts on nationally protected habitats and sites. Two statutory designated biodiversity sites of national importance were identified within 2km: Nant Gelliwion Woodland SSSI and Rhos Tonyrefail SSSI. Of the two sites, Rhos Tonyrefail SSSI is taken forward for assessment within the Draft Chapter. Rhos Tonyrefail SSSI is a large lowland site of special interest for its marshy grassland, acid flush, species-rich neutral grassland, acid grassland, wet heath and blanket mire. These habitats are associated with areas of woodland. The site is also of special interest for its population of marsh fritillary butterfly. The

Policy 18 criteria	Compliance
protected habitats and species;	SSSI is located outside the Site, though very close at ~5m to the south of the proposed location of the access track. The SSSI would not be subject to direct land take or encroachment effects. Although the principal access track leading to the proposed wind farm would be 25m from the SSSI at its closest distance it would not affect the habitats which comprise the SSSI themselves. In addition, the applicant has undertaken surveys for marsh fritillary butterflies but neither the butterflies nor their host plant has been identified on land subject to temporary or permanent disturbance. through webs surveys and also for their host plant, devils bit scabious. Surveys found no presence of marsh fritillary or devils bit scabious. There would be no direct effects on Rhos Tonyrefail SSSI whilst embedded measures would ensure that indirect effects would be prevented or appropriately managed. The Draft Chapter concludes that the Proposed Development would have no effect on the integrity or conservation status of the Rhos Tonyrefail SSSI, and the effects are considered Not Significant on an ecological feature of National (UK) importance. Draft ES Chapter 9 records that there are no national statutory designated sites (i.e. SSSIs or NNRs) that list ornithological features within 2km of the Site. Consideration of effects upon individual species, and the identification of any significant effects is provided in the assessment of policy compliance with TAN5 below.
5. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;	The Applicant is committed to preparing a Habitat Management Plan (HMP) which will set out the objectives for biodiversity protection, mitigation, monitoring and habitat enhancement measures (where applicable). This will be developed in consultation with RCTCBC and an outline document prepared to accompany the submission of the application. The Plan will aim to mitigate habitat loss within the Mynydd y Glyn SINC and it will set out long-term habitat management and monitoring focussing on key habitats (such as the blanket bog and wet heath/acid grassland).
6. There are no unacceptable adverse impacts on statutorily protected built heritage assets;	Chapter 7 of the Draft ES identifies the location of historic assets recording that there are no Listed Buildings or Scheduled Monuments on site, the closest Listed Building being approximately 800m from the site boundary and Scheduled Monument some 1.3km. It concludes that the Proposed Development would not result in significant effects on built heritage assets including a number of Scheduled Monuments, Listed Buildings, Conservations Areas, and the Ynysangharad Park Historic Park and Garden in Pontypridd. Draft Chapter 7 also concludes that the Proposed Development would also not result in any significant effects upon undesignated heritage assets such as post-medieval cairns and stone field boundaries nor would it have a significant effect arising from the potential for the disturbance of archaeological remains. Assessments of significance take into account both construction and operational effects and result in part from an absence of features within and close to the site and the design of the project which has sought to avoid locations of non-designated assets which have been identified as part of the baseline assessment. Direct effects on existing known archaeology will be mitigated through archaeological recording such as an excavation or watching brief in any areas of impact. The exact method of recording would be secured through a DNS planning condition. Standing and sub-surface archaeology in the form of the Trig Pillar, and Hafod Rhiwgarn would be protected by temporary fencing during construction.

Policy 18 criteria	Compliance
7. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;	Draft ES Chapter 15 assesses the likely impacts by way of shadow flicker. Twenty four receptors comprising individual properties or groups of properties, have been identified as having the potential to experience shadow flicker for which modelling was undertaken. The modelling demonstrated that shadow flicker could significantly affect 10 of these receptors with a further 14 experiencing non-significant effects. With the ability to implement a control system to shut down wind turbines the resulting conclusion of the draft ES is that effects would not be significant. Draft ES Chapter 13 assesses noise. Consideration of the potential for significant effects focuses upon whether accepted noise standards in the form of ETSU-R-97 could be breached as a result of wind farm operation. Attention is focused upon those residential receptors closest to the Proposed Development. The initial noise assessment reported within the Draft Chapter concludes that there is the potential for a significant effect at properties noted as R2 and R3. The exceedance of the ETSU guidance would be in the daytime. The assessment is worse case, i.e. it does not factor in directivity, and further analysis will therefore be undertaken. Ultimately the Applicant has the opportunity to reduce the operating modes for the two turbines which create the exceedance (turbines 1 and 6), such that residual effects are considered to be not significant. With regards to electromagnetic disturbance Draft ES Chapter 14 identifies that degradation of signals is possible as a result of consultation with stakeholders. However, the Applicant is prepared to resolve such matters and discussions are ongoing to agree a technical solution which may result in a planning condition to any DNS consent which requires the Applicant to address any localised interference issues arising during operation. Impacts on air quality were scoped out of the EIA.
8. There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);	Chapter 14 of the Draft ES explores the likely effects on aviation and telecommunications. With regard to military aviation and radar the independent aviation consultant appointed by the Applicant to consider such matters concluded that there would be no MoD ATC, Air defence of Met Office radar affected whilst the site's location is a 'Green' area where MoD low flying objections are extremely unlikely. Whilst accepting that the criterion does not reference civilian aviation consultation with NATs has indicated that the Proposed Development could have an unacceptable impact upon operations at Cardiff Airport. However, a review undertaken by the Applicant's aviation consultant has suggested that mitigation options are available and that further discussions are underway with NATs/Cardiff Airport to agree these which could be the subject of a planning condition to the DNS.
9. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during	Chapter 12 of the Draft ES examines the potential effects on the transport network and assesses the A4233 (Trebanog), A4119 (Talbot Green) and A4058 (Trehafod) roads. It is proposed to create a new construction access on the A4233. All construction materials such as aggregate and concrete will be sourced from local batching plants and quarries. The assessment assumes worse case scenario of all construction materials arriving from one source and it identifies two routes for consideration. Separately an AIL study has been

Policy 18 criteria	Compliance
its construction and/or ongoing operation;	undertaken to consider the potential route for the delivery of turbine components from Swansea docks (Draft ES Appendix 12A). Based on the construction programme the approximate peak of 42 HGV movements per day two-way (approximately. 21 arrivals plus 21 departures per day) is predicted. This number represents between 0.2% and 0.6% of total vehicle movements along the three roads assessed and exceeds only a 30% increase in HGVs along the A4233 Trebanog Road. The other two roads are therefore scoped out of further assessment. The assessment for the A4233 Trebanog Road considers the effects on severance, driver delay, pedestrian delay and amenity, fear and intimidation (of pedestrians and cyclists), accidents and safety and concludes that they would be not significant. A Draft Construction Traffic Management Plan (CTMP) has also been prepared (Draft ES Appendix 12B). This sets out the management of daily delivery profiles and controls construction vehicle movements and routeing of HGVs to/from the site.
10. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;	The Proposed Development has been designed so as to minimise the materials needed during construction. The materials required include stone, which is anticipated to come from local quarries (see Chapter 4 of the Draft ES). Draft ES Chapter 11 sets out the land subject to the Proposed Development is classified as Agricultural Land Classification Grade 4 (poor quality land) or lower. No land that is classed as the best and most versatile (Grades 1, 2, 3a) is therefore lost by the development. The maximum area of soil loss is expected to be around 6.99ha which is not assessed as significant. Embedded measures will ensure that soil is reused on site where possible and low ground pressure machinery will be used where possible to minimised soil impaction. All construction activities will be informed by a Construction Environmental Management Plan (CEMP) which will be secured by condition. The CEMP will include measures to manage (inter alia) waste during construction. No materials will be generated or removed from site during operation of the windfarm.
11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.	Draft ES Chapter 4 sets out the likely to decommissioning. The options for the end of the 30 year lifespan are to apply for continuation of existing wind turbines, to repower the site using new turbines or for decommissioning and reinstatement of the site. For the purposes of the ES assessment decommissioning is assumed. The design allows for decommissioning and recycling/reuse of materials where appropriate to do so. No stone would be removed from site. Stone laid tracks would be left in situ and could be repurposed for other uses by the landowner or support recreational use.
12. The cumulative impacts of existing and consented renewable energy schemes should also be considered.	The Draft ES sets out an assessment of the cumulative effects of the Proposed Development in combination with existing and consented renewable energy schemes within the topic-related specific chapters (Chapters 6 to 16). Chapter 2 of the Draft ES outlines the approach to the assessment. Overall, the cumulative assessment does not identify any additional impacts that would be unacceptable.

4.6.28 **Section 4.3** sets out the TAN considered relevant to the Proposed Development. The performance of the Proposed Development against the TANs is set out within **Table 4.2**.

Table 4.2 Compliance with Technical Advice Notes

Technical Advice Note	Assessment of Proposed Development
Technical Advice Note 5: Nature Conservation and Planning (1996)	The Draft ES does not identify significant effects on ecological receptors but it has recorded the potential for significant effects upon ornithological (Golden Plover). This is due to the number of birds present within the Proposed Development and the regular extended flight behaviour of the flocks means that the predicted number of collisions is very high. It is proposed to carry out additional survey work, to be completed in 2022/2023 to provide more information on the behaviour of the golden plover such that more accurate collision predictions can be developed and specific mitigation measures identified to address this effect.
Technical Advice Note 6: Planning for Sustainable Rural Communities (2000)	The Proposed Development would comply with the TAN as the provision of renewable energy developments is considered likely to be an appropriate use at farm locations.
Technical Advice Note 11: Noise (1997)	Draft ES Chapter 13 assesses noise in line with the relevant ETSU guidance. The Proposed Development has the potential to give rise to significant daytime effects at two properties as a result of two turbines. Further baseline modelling using a full height met mast and consideration of directivity will be undertaken. Should results still indicate a potential for significance, the two affecting turbines can have their power outputs reduced. The Applicant is therefore confident that the effects resulting from noise will not be significant.
Technical Advice Note 12: Design (2016)	The Proposed Development is designed to make the most effective use of the land for wind power generation with effects mitigated as far as is possible for development of this type. The Draft DAS provides further detail about the site context and character, movement and access arrangements and considerations, and community safety. The Proposed Development complies with the requirements of TAN 12.
Technical Advice Note 19: Telecommunications (2002)	The Draft ES concludes that there could be interference with Cardiff Airport operations but recognises that discussions are ongoing with both the Airport and NATS to identify suitable mitigation. With regard to military aviation, no significant effects upon operations are identified. There is the potential for effects upon telecommunications however the Applicant is committed to continue discussion with the relevant service providers with the aim of identifying technical solutions to ensure that signals are not degraded.
Technical Advice Note 23: Economic Development (2014)	The Proposed Development would lead to investment in the local and regional economy and the provision of employment in the construction and operational phase. The Draft ES (Chapter 16) sets out further consideration of the effects.
Technical Advice Note 24: The Historic Environment (2017)	The Draft ES concludes that there would be no significant effects upon sites, buildings and areas designated for their historical significance. The potential for effects upon unknown archaeology as a result of construction would be addressed via archaeological recording secured by a condition to the DNS consent.

Assessment of compliance with Local Development Plan

4.6.29 **Table 4.3** summarises the development's performance against what are considered to be the key policy criteria set out on a topic basis. The conclusion of the assessment in **Table 4.3** is that the proposed wind farm is compliant with the LDP.

4.6.30 The LDP is 'time expired' due to the lifetime of the plan having ended in 2020. Future Wales is the up-to-date development plan document for the site and therefore where policies conflict or provide criteria incompatible with Future Wales then weight attached to the policy is necessarily diminished when assessing the Proposed Development against the provisions.

Table 4.3 Rhondda Cynon Taf County Borough Council Local Development Plan policies

Adopted LDP policy	Policy summary	Compliance with policy
CS1 Development in the North	Policy focus is upon economic and social development which seeks to build strong, sustainable communities. Objectives with a potential relevance to the Proposed Development are that it seeks to promote accessibility including walking and cycling, encourage a strong and diverse economy promoting employment in leisure and tourism, protect the cultural identity by protecting historic built heritage and the natural environment.	Turbine T2 sits within that part of the County Borough identified within the LDP as falling within the Northern Regeneration Area. The Proposed Development will not prevent access onto Mynydd y Glyn whilst the Draft ES does not identify any significant effects upon tourism, cultural heritage. The natural environment in the form of Golden Plover could be affected significantly. Further work is underway to better understand the potential for effects.
CS2 Development in the South	With an emphasis on sustainable growth though social and economic regeneration objectives of potential relevance to the Proposed Development are considered to be limited to the need to protect the cultural identity of the Strategy Area by protecting historic built heritage and the natural environment.	The assessment of effects upon the historic environment reported within the Draft ES concludes that the Proposed Development would not generate significant effects. There are no listed buildings or schedule ancient monument on the site such that direct effect upon historic built heritage would be avoided. The assessment of effects upon biodiversity and ornithology identifies no biodiversity effects that are considered to be significant but does identify a potential for significant effects upon Golden Plover. Further work is underway to better understand the potential for effects.
AW7 Protection and Enhancement of the Built Environment	Policy seeks to only permit development proposals which impact upon sites of architectural and/or historical merit, and site is archaeological importance where it can be demonstrated that they preserve or enhance the character and appearance of the site.	As above in the consideration of performance against Policy CS2, no features designated for their historic significance would be directly affected by the Proposed Development whilst indirect effects would not be significant. The Applicant proposes an archaeological watching brief, secured by condition to mitigate the potential for effects upon archaeology.

Adopted LDP policy	Policy summary	Compliance with policy
AW8 Protection and Enhancement of the Natural Environment	Aims to preserve and enhance the distinctive natural heritage by protecting it from inappropriate development permitting development only where it would not cause harm to SINCs or RIGs or other locally designated sites unless it can be demonstrated that that the proposal is necessary for their positive management, would not unacceptably impact on the reasons for designation or could not be reasonably be located elsewhere and the benefits clearly outweigh the value of the site. Furthermore, that there would not be unacceptable impacts upon features of importance to landscape or nature conservation, including ecological networks, natural resources such as air, water and soil and natural drainage of surface water.	The Draft ES considers effects upon biodiversity and separately, ornithology. There are no internally or national designated sites directly affect by the Proposed Development. The site is included within the Mynydd y Glyn SINC and Chapter 8 records that effects would not be significant this is because Mynydd y Glyn SINC is predominantly designated for its blanket bog. The bog will be retained with no elements of the Proposed Development within this habitat. There will be limited permanent loss of common and widespread habitats (wet heath/acid grassland and grazed semi-improved acid grassland) which will be off-set by compensation and enhancement measures (that will be detailed in a HMP at final ES submission). Measures will improve the ecological value of retained areas of the SINC and the assessment concludes that the site integrity or conservation status of Mynydd y Glyn SINC would be maintained.
AW10 Environmental Protection and Public Health	The Policy does not permit development that could result in unacceptable harm to heal and/or local amenity due to air, light, noise pollution, landfill gas and land stability, water pollution, flooding or other risk to the environment, local amenity, public health or safety unless measures can be provided to overcome the above.	The Proposed Development will not give rise to significant effects as a result of air or light. Consideration of air quality effects was scoped from the assessment with the agreement of PEDW. Lighting of the proposed wind turbines would be required for aviation purposes and the Landscape and Visual chapter concludes that resulting visual effects would not be significant. Draft ES Chapter 11 considers ground conditions, including contamination, landfill gas and land stability. It concludes that effects will not be significant.
AW12 Renewable and Non-Renewable Energy	Permits development of renewable and non renewable energy schemes where it can be demonstrated that there will be no unacceptable harm upon the interests of soil conservation, agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity. Development should minimise resource use.	The aim of the Proposed Development is to generate renewable energy. The Draft ES which accompanies this Draft Planning Statement considers the potential for significant effects upon land (soil) land use (agriculture) nature conservation, historic (cultural) and landscape whilst public health is addressed indirectly via consideration of emission from noise and emissions to water. Air Quality was scoped out of the assessment. The conclusions drawn in the Draft ES are that there are no effects other than landscape and visual effects which are considered to be significant without the ability to introduced additional mitigation.
AW13 Large Wind Farm Development	Proposals for wind farms over 25MW will be permitted where it can be demonstrated that it is within the	The concept of Strategic Search Areas has been replaced by Pre-assessed Areas for Wind within Future Wales. Whilst the site lies

Adopted LDP policy	Policy summary	Compliance with policy
	boundary of a Strategic Search Area, on predominantly flat, extensive area of upland, a minimum of 500m from residential properties, unless it can be demonstrated that closer would not have an unacceptable impact on human health, will not have an unacceptable effect on the visual quality of the wider landscape, minimise and possibly enhance public access, not cause unacceptable harm and where appropriate enhance sites designated for the nature conservation value, protect the beauty and special qualities of the BBNP.	outside of a PPA it is recognised that national planning policy retains a positive presumption in favour of onshore wind. The site of the Proposed Development is characterised as being a predominantly flat extensive upland area and is a minimum distance of 442m from the nearest residential property (Rhiw-garn-fach Farm). However, this property is owned and occupied by one of the landowners for the scheme. With appropriate mitigations in place the assessment of noise, shadow flicker and visual impact conclude that occupiers of the property would not experience an unacceptable effect upon their health. The Landscape and Visual assessment concludes that the Proposed Development would not give rise to significant effects upon the landscape of the BBNP and that the beauty and special qualities of the national park will be preserved. The locally designated Special Landscape Area which would host the Proposed Development, the Mynydd y Glyn and Nant Muchudd Basin SLA would be affected significantly by the wind farm, although this level of significance would not be universal across the area. This conclusion is reached given its physical presence within the local designation. The effect is not considered unacceptable however in planning terms given that the landscape would still be accessible, undisturbed in the most part by physical development and the fact that SLAs are commonly considered to be acceptable locations for wind farms as evidenced by the Pre Assessed Areas for Wind (Policy 17 Future Wales). The biodiversity assessment (Draft ES Chapter 8) concludes that there would be no significant effects upon designated sites, non designated sites and protected species. Separately, the ornithological assessment (Draft ES Chapter 9) concludes that whilst designated and non designated sites would not be affected significantly, there is the potential for a significant effect upon Golden Plover. Further work is therefore proposed to better understand the usage of the site by Golden Plover and to inform additional mitigation.

Adopted LDP policy	Policy summary	Compliance with policy
AW14 Safeguarding of Minerals - Sandstone	The polices seeks to safeguard minerals from development that would unnecessarily sterilise them or hinder their extraction recognising in the supporting text that there may be significant constraints to their extraction such as proximity to residential areas and designated sites for landscape and nature conservation. It notes that Pennant Sandstone cover approximately 70% of RCTCBC.	The Proposed Development would be located on land safeguarded for the extraction of sandstone. Supporting text to the policy suggests that permanent development and land uses considered unsuitable would include residential development, hospitals and schools, or where an acceptable standard of amenity should be expected. The area designated as a sandstone safeguarded area extends across all of the undeveloped land between Pontypridd and Rhydyfelin in the east to Tonyrefail in the west, Porth to the north and Llantrisant to the south. A such and as recognised by the LDP it covers a substantial part of the county borough. The Proposed development would represent a temporary use of land such that once it is decommissioned, land can be accessed for sandstone. Furthermore and whilst in operation, the amount of land which the proposed development would occupy, temporarily, would be very small in comparison to the area of standstone safeguarded in the county borough. A proportion of the Proposed development site is designated as a SINC, sandstone quarrying would have an effect upon this designation significantly more substantial that the proposal for a wind farm. In view of the above it is considered that the proposed development would not compromise RCTCBC's aspiration for sandstone extraction.
SSA22 Green Wedge	Green Wedges are identified to prevent the coalescence of settlements. Within these areas development that would prejudice the open nature of the land will not be permitted.	The access track from the A4233 passes through an area designated as Green Wedge. The access track does not represent a building and as such it would not change the character of the Green Wedge. It would also not affect the urban form of the existing settlement pattern. As the Proposed Development would not therefore lead to the coalescence of settlements.
SSA 23 Special Landscape Areas	Identifies Special Landscape Areas including *6. Mynydd y Glyn and Nant Muchudd Basin*. It states that development within these areas will be expected to conform to the highest standards of design, siting, layout and materials appropriate to the character of the area.	Supporting text to the policy stats that particular consideration has been given to the protection of unspoilt low-lying farmland, common land and gentle valley slopes. On high ground above the settlements the Proposed Development would not be located on either of these three landscape categories. The Landscape and Visual Assessment considers the potential for effects upon the SLA. It concludes that effects would be significant although this

Adopted LDP policy	Policy summary	Compliance with policy
		level of effect would not be universal across the whole of the SLA. The design has sought to work with the landscape in the way in which access tracks and other associated infrastructure has been located and designed accepting that wind turbines. Wind farms by their nature are predominantly located on exposed high ground and as such are typical development forms in landscapes such as the Mynydd y Glyn and Nant Muchudd Basin SLA.

5. Conclusion

5.1 The Planning Balance

5.1.1 Future Wales is clear that decision makers must give significant weight to the need to meet Wales' international commitments and to generate 70% of energy used from renewable sources by 2030. The Applicant is seeking to consent a wind farm of upto 30MW and based on indicative, smaller capacity turbines of 3.45MW, the Proposed Development would see the generation of 24.2MW of renewable energy which would support the electricity needs of around 15,376 homes.

5.1.2 Additionally, the Proposed Development would support investment in the economy and employment with approximately 41 FTE (full time equivalent) jobs during construction and 4 FTE during operation. It is estimated that the expenditure in Wales associated with the construction phase would total £9.6m whilst the operation phase would equate to £0.7m per annum. The Proposed Development would also be locally owned with the Pennant Walters and its parent company the Walters Grouped headquartered within RCT.

5.1.3 Such benefits in terms of contributing to energy targets and economic benefit have to be balanced against the adverse impacts.

5.1.4 Whilst the Proposed Development would be located outside a Pre-Assessed Area for wind, Future Wales Policy 18 is clear that there remains a positive policy framework in favour of onshore wind development. The purpose of the PAAs is to identify land where a high-level consideration of impacts upon the landscape has concluded that onshore wind can be accommodated acceptably. This does not mean that other areas cannot also accommodate a wind farm, subject to detailed consideration of potential landscape effects. The Draft ES accompanying this Draft Planning Statement includes such an assessment and this records that significant landscape effects would be restricted to the host SLA and two nearby SLAs although the level of effect would not be universal with parts of each SLA experiencing effects considered to be less than significant. There would be no significant effects on the nationally designated Brecon Beacons National Park nor upon any AONB.

5.1.5 Onshore wind farms by their nature give rise to localised landscape (and visual) effects but the level of effect must be balanced with the benefits of the development and for this application, viewed against the significant weight to be afforded to need to generate energy from renewable resources as set out within Future Wales, referenced above. SLAs are local designations commonly designated at a national level as appropriate for onshore wind as evidenced in the Pre-Assessed Areas for wind, and prior to Future Wales, by TAN8's SSAs. Significant effects upon them should therefore be afforded limited weight when compared with the wider project benefits.

5.1.6 With regards to biodiversity, the Draft ES assesses that there are no unacceptable impacts on the integrity of internationally designated sites, nor upon those designated at a national level. Whilst the potential for a significant effect upon Golden Plover has been identified, further work will be undertaken to develop a mitigation strategy which may be able to reduce the potential to one that is not significant. This will be confirmed within the documentation that will support the DNS application.

5.1.7 The applicant proposes to enhance the quality of habitats at the suite recognising that part of the site is designated as a SINC. An outline habitat management plan will also be submitted with the DNS application.

5.1.8 With regards to the historic environment no significant effects on statutorily protected built heritage assets have been identified in the Draft ES for the Proposed Development whilst effects from shadow flicker, noise light can be mitigated with air quality and electromagnetic disturbance scoped from assessment.

5.1.9 Consultation has concluded that the Proposed Development will not have an unacceptable impact upon defence facilities or operations whilst the transport assessment presented within the Draft ES does not identify any significant effects arising from the construction of the Proposed Development. Materials will be sourced locally wherever possible whilst construction of the Proposed Development will be led by Pennant Walters as part of the Walters Group, a locally owned and headquartered company. Decommissioning will be secured via condition to any DNS approval.

5.1.10 Overall, the Proposed Development is considered to accord with Policy 18 of Future Wales in that the environmental effects arising from its construction and operation are not considered to be significant when weighed against the benefits that it would deliver by supporting Welsh Governments aims of generating 70% of consumed electricity by renewable means by 2030 (consistent with Policy 17). Compliance is also identified against the relevant TANs and policies of the local development plan.

5.1.11 Whilst effects upon the local landscape have been identified as being potentially significant the positive policy framework in favour of onshore wind referenced within Future Wales indicates that consent for the Proposed Development should be forthcoming.

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