MYNYDD Y GAER WIND FARM

Planning Statement

00322
23 January 2025

rpsgroup.com

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
V1	Pre-Application Consultation	Ross Irvine	Damian Barry	Damian Barry	24/01/2025

Approval for issue

Damian Barry		24 January 2025

Prepared by:

RPS

Ross Irvine
Senior Planner

2 Callaghan Square
Cardiff
CF10 5AZ

T +44 2920 668 662
E ross.irvine@rps.tetratech.com

Prepared for:

Cenin Renewables Ltd

Martyn Popham
Director

Solcer House
Parc Stormy
Bridgend

T 01656 760550
E martynp@cenin.co.uk

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1 INTRODUCTION

1.2 RPS is instructed by Cenin Renewables Limited ("Cenin") to submit a planning application for the construction and operation of up to 11 wind turbines and associated infrastructure on land at Mynydd y Gaer Common to the north of Heol y Cyw, Bridgend. The Site is located within the Bridgend County Borough Council (BCBC) administrative area. The project is known as '**Mynydd y Gaer Wind Farm**'.

The Applicant

1.3 Cenin (the Applicant) is a Bridgend based renewable energy company committed to powering a greener future. In 2021 Cenin was recognised for its work by the Queen's Award for Enterprise – Sustainable Development.

1.4 The founding principles of Cenin are based on energy generation using natural resources, recycling of materials and sustainable and secure job creation. Planning Policy Wales (PPW) 12 paragraph 5.9.25 states '*the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into and given weight in the decision-making process'.*

1.5 The principles that underpin Cenin have led to the development of its innovative renewable energy centre at Cenin's headquarters at Parc Stormy in Bridgend County Borough Council (BCBC). Through their innovative approach to renewable energy provision, Cenin unlocks hidden green energy potential and utilises the earth's natural resources.

1.6 The Proposed Development at Mynydd y Gaer is part of the applicant's wider plans to develop a Bridgend Energy Hub, a scheme that will combine the production of renewable energy for use in the local area, the development of employment space and sustainable transport hub near junction 36 of the M4. As well as generating electricity, Mynydd y Gaer will create improved access for walkers and cyclists to utilise the common. Seven of the eleven proposed wind turbines are located on the CL20 Mynydd Y Gaer Common, as are most of the access tracks, and infrastructure.

Background to the Application

1.7 The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South East Wales economy. Local ownership and distribution is important for ensuring communities in proximity to renewable energy development benefit from it and that the future energy system better serves Wales.

1.8 National Grid anticipates annual electricity demand in the UK could increase from 330 TWh in 2020 to up to 627 TWh in 2050, an increase of 90%. Similarly, peak demand in 2019 of 59 GW could increase to up to 96 GW, an increase of 63% over the same period. There is therefore an urgent need to increase electricity capacity in the UK to ensure a secure and stable supply in the future and achieve renewable energy and net zero targets.

1.9 Wales has set a target that by 2030 renewables are to generate electricity equal to 70% of its consumption. Currently, it is estimated up to 51% of electricity consumption in Wales is from renewables. It has set a further target for Wales to achieve a 95% reduction in greenhouse gas emissions by 2050 with an ambition to go beyond the target and achieve 'net zero'.

1.10 2019 also saw the Welsh and UK Governments declare 'climate emergencies', recognising the potentially catastrophic consequences of global warming on ecosystems and human populations. Consequently, there is an urgent need to install new zero-carbon electricity generating stations in Wales and beyond. BCBC declared their own climate emergency in June 2020 and set up its Climate Emergency Response programme. The Bridgend 2030 Net Zero Carbon Strategy is the initial strategic step in achieving this commitment.

Development of National Significance (DNS) and Secondary Consent

1.11 The anticipated maximum export capacity of the Proposed Development is circa 75 MW. Therefore, the Proposed Development falls within the definition of a DNS under regulations 3 and 4 of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016.

1.12 Cenin is intending to apply to the Welsh Ministers for planning permission in respect of a DNS which is:

'*(1) The construction and operation of up to 11 wind turbines and associated infrastructure including substation switches, access tracks and turning heads, borrow pits, temporary construction compounds (including holding bays), crane pads, underground cabling, drainage works and biodiversity proposals including creation, enhancement and restoration; and (2) grid connection comprising the installation of underground electricity cables'*

1.13 The DNS application also considers that the following secondary consents are connected with the proposed application and that a decision in respect of those consents is to be made or should be made by the Welsh Ministers. Details of the secondary consents are as follows:

- *Consent under Section 38 of the Commons Act 2006 for works on Common, laying electricity cables underground alongside tracks and expansion of existing carpark with grasscrete surface to increase social well-being.*
- *Consent under Section 16 of the Commons Act 2006 for the deregistration of land within Coity Wallia Common and exchanging it for replacement land adjoining Coity Wallia Common;*
- *Consent under Section 247 of the Town and Country Planning Act 1990 for an order authorising the downgrading of a Byway Open to All Traffic (BOAT) into a restricted byway to protect the common's most important ecology and biodiversity; and*
- *Consent under Section 57 of the Town and Country Planning Act 1990 for planning permission to authorise the grid connection comprising the installation of underground electricity cables.*

1.14 The submitted documents for these secondary consent applications will be included as part of the DNS planning application.

Purpose and Structure of the Planning Statement

1.15 Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that the application for the Proposed Development is determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan comprises the National Development Framework (NDF) for Wales and the relevant Local Development Plan for the Site.

1.16 The purpose of this Planning Statement (PS) is to introduce the project in planning terms, provide relevant planning policy context, followed by an assessment of the Proposed Development against the Development Plan as well as other material considerations. Other material considerations include UK and Welsh Government energy and environment policy relevant to renewable energy development and specifically wind energy.

1.17 Whilst assessing the impact of the Proposed Development against planning policy, this PS considers the local and wider benefits which would arise from the construction and operation of the wind farm development. The conclusion reviews the overall acceptability of the Proposed Development by considering the planning balance between the need for renewable energy, specifically wind development.

1.18 The PS is not part of the Environmental Statement (ES) which is also submitted with the application to Planning and Environment Decisions Wales (PEDW). The Proposed Development is considered to be an EIA Development under the Town and County Planning (Environmental Impact

Assessment) (Wales) Regulations 2017 (the 'EIA Regulations'). An EIA Scoping Direction Request was submitted to PEDW in March 2023, with an EIA Scoping Direction response received in August 2023. As such, an ES has been prepared and will be submitted as part of the application. The Planning Statement makes reference to the ES where relevant.

Planning History

1.19 The Site has seen very little development activity. Desk-based research of historical planning consents and consultation with BCBC has confirmed the following planning history on Site:

- Application reference P/12/797/FUL – Coity Wallia Common - Construct 5 ponds around each for biodiversity benefit – Approved 10/12/12
- Application reference P/17/912/FUL – Caner Mawr, Blackmill - Change of Use of existing dwelling to tourism holiday let dwelling (affecting Footpath No. 33, Coychurch Higher)

Community Engagement

Formal Community Engagement

1.20 The Developments of National Significance (Wales) Regulations 2016 ("the DNS regulations") requires the applicant to undertake statutory pre-application consultation (PAC) on the full draft planning application for a period of no less than 42 days. This is to provide technical and community stakeholders, and local people, a further opportunity to provide feedback on the project and the assessments produced in support of the Proposed Development.

1.21 In accordance with the DNS regulations, Cenin has written formally to specific community consultees, including representatives from BCBC and Community Councils, to inform them of the Proposed Development and directing them to the documents uploaded on to the PAC website.

1.22 The Mynydd y Gaer PAC website also provides further detail of the Proposed Development and invites comments on the draft planning application which will be reported in the forthcoming Pre-Application Consultation Report which will be produced in support of the planning application.

1.23 The pre-application consultation was advertised in the Glamorgan Gazette and the Western Mail local newspapers on the 23rd January 2025 and 28th January 2025 respectively. Site notices were also erected at various locations adjacent to the Site and will be maintained in position until the 12th March 2025.

Informal Community Engagement

1.24 Prior to statutory consultation, the client has undertaken a number of non-statutory engagements with local councillors, commoners and members of the public since 2021.

1.25 Community Council engagement with Coychurch Higher Community Council, St Brides Minor Community Council, Pencoed Town Council, and Ogmore Valley Community Council has been conducted since the end of 2021.

1.26 A number of meetings have been held with the Board of Conservators, Commoners of the Coity Wallia Commoners Association and Active Graziers of Coity Wallia Commoners Association since 2022.

1.27 Drop-in Sessions were held in the community during 2023, at venues across BCBC including Heol y Cyw, Bryncethin, St. Tyfodwgs and Blackmill.

1.28 There has been further consultation with BCBC in 2023 and 2024. All 51 Bridgend Councillors and relevant officers have been notified of all new content and Drop In Sessions. The following meetings have been held:

- Meeting with Bridgend County Borough Council Cabinet on 04.05.23 and 09.04.24
- Meeting with Bridgend County Borough Council Officers on 07.09.23, 16.11.23, and 01.08.24
- Meeting Cllr Paul Davies Cabinet Member for Climate Change and Environment 01.08.24
- Meeting Bridgend County Borough Youth Council 18.10.23

1.29 The following local councillors have been engaged with the scheme from 2022:

- Cllr Paula Ford
- Cllr Tim Thomas
- Cllr Mark John
- Cllr Melanie Evans
- Cllr Alex Ulberini- Williams
- Cllr Richard Williams
- Cllr Amanda Williams
- Cllr Martin Williams

1.30 Similarly, all relevant politicians at the time have been engaged with between 2021 and 2024:

- Jamie Wallis MP
- Sarah Murphy MS
- Huw Irranca Davies MS
- Chris Elmore MPLuke Fletcher MS
- Rhun ap Iorwerth

1.31 The applicant has also conducted a number of brochure drops, advertising the wider Bridgend Energy Hub.

1.32 In August 2022, the applicant conducted an initial brochure drop. In July 2023, an update brochure was distributed to 22,000 people, providing additional specific details of the Mynydd y Gaer scheme. In summer 2024, another Project Update Brochure was sent out to 15,000 homes. Finally, a Bridgend Energy Hub update and pre-PAC brochure was sent out to 15,000 homes in January 2025, also making local residents aware of the upcoming PAC.

1.33 To compliment the PAC process, The Applicant is hosting a number of drop-in sessions in the following locations:

- Glynogwr on 06.02.25
- Bryncethin on 12.02.25
- Blackmill on 19.02.25
- Heol Y Cyw on 27.02.25
- Pencoed on 05.03.25

2 THE PROPOSED DEVELOPMENT

Site Location

2.2 The Site is located to north of the M4 motorway and the settlement of Heol y Cyw, which lies approximately 5 miles from Bridgend. The highest point of Mynedd y Gaer is 295m. The Site includes common land, a network of footpaths and is used despite being discouraged by off road vehicles. From the junction on the B4280 at Pencoed the road north to the A4093 near Glynogwr passes through the Site. These details are illustrated in the MyG4-11a Site Location Plan (Appendix A).

Site Description

2.3 The Site consist of fields predominantly used for upland sheep grazing comprised of common land and plantation forestry. Sheep grazing will still continue, and the land would be managed to also benefit existing habitat enhancement as well as retaining open access and public rights of way (PRoW).

Proposed Development

2.4 The application proposes the construction and operation of up to 11 wind turbines and associated infrastructure including substation switches, access tracks and turning heads, borrow pits, temporary construction compounds (including holding bays), crane pads, underground cabling, drainage works and biodiversity proposals including creation, enhancement and restoration.

2.5 The Proposed Development at Mynydd y Gaer is part of the applicant's wider plans to develop a Bridgend Energy Hub, a scheme that will combine the production of renewable energy for use in the local area, the development of employment space and sustainable transport hub near junction 36 of the M4. As well as generating electricity, Mynydd y Gaer will create improved access for walkers and cyclists to utilise the common.

Key Components

- Turbines;
- Substation switches;
- Access tracks and turning heads;
- Borrow pits;
- Temporary construction compounds and holding areas; and
- Crane pads.

Turbines

2.6 The Proposed Development consists of 11 turbines. The turbines consist of two specification types (V150 and V162). There will be three V150 turbines and eight V162 turbines. Details of the turbine specifications are provided in Table 2.1 below.

Table 2.1: Turbine Specifications

	V150	V162
Max turbine tip height	180m	198m
Max turbine hub height	105m	119m*

Rotor diameter	150m	162m
Turbine radius (m)	75m	81m

**Please note: T11 is a V162 model with a larger hub height of 149m and tip height of 230m.*

2.7 An outline of the individual turbine sizes is provided in Table 2.2 below:

Table 2.2: Individual Turbine Specifications and Grid References

Name	Hub Height (m)	Rotor Diameter (m)	Tip Height (m)	Easting	Northing
T1	119	162	198	294166	185792
T2	105	150	180	294511	185550
T3	119	162	198	295032	185829
T4	105	150	180	294692	186296
T5	105	150	180	295344	186325
T6	119	162	198	295519	185931
T7	119	162	198	295848	186235
T8	119	162	198	295967	185862
T9	119	162	198	296521	186082
T10	119	162	198	296501	185599
T11	149	162	230	297052	185435

Grid Connection

2.8 The grid connection is proposed south of the development, west of Heol y Cyw. The exact location of the grid connection is as shown in Figure MyG4-11b) Site Layout Plan. The grid connection is shared with the approved Ty'n y Waun Solar Farm (DNS/3279521), as part of the Bridgend Energy Hub. The grid connection also forms part of a DNS secondary consent under **Section 57 of the Town and Country Planning Act 1990 for planning permission to authorise the grid connection comprising the installation of underground electricity cables.**

Access tracks and turning heads

2.9 The Proposed Development comprises the construction, operation and maintenance and decommissioning of on-site surfaced tracks providing access to the wind turbines, onsite substation compound and temporary construction compounds from the local highway network;

2.10 Most of the on-site access tracks would be required to facilitate the construction of the Proposed Development.

2.11 Additionally, a number of access tracks will be retained after construction in order to facilitate maintenance activities during the operational phase.

Borrow pits

2.12 Borrow pits will be excavated to provide fill materials required for construction of the Proposed Development, such as the on-site access tracks, wind turbine foundations and landscaping areas.

Temporary construction compounds and holding areas

2.13 The compounds would be used, where necessary, for temporary storage of the various components and materials which are required for construction.

2.14 The temporary construction compounds will be reinstated at the end of the construction phase. The stored subsoil and the stored topsoil would be laid over the underlying stone surface and then reseeded using a seed mix selected or, where possible, turfs would be reinstated.

Crane pads

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

3 PLANNING POLICY CONTEXT

UK Policy

Climate Change Act 2008

3.2 The Climate Change Act 2008 received Royal Assent on the 26th November 2008 and introduced legally binding targets on the Secretary of State (SoS) to reduce the UK's net greenhouse gas emissions by at least 80% from 1990 by 2050. In 2019, it was updated through The Climate Change Act 2008 (2050 Target Amendment) Order 2019 to increase this target to 100%. The Climate Change Act 2008 also established a series of measures to achieve these targets, including the introduction of carbon budgeting, a carbon trading scheme, and the creation of a new Committee on Climate Change (CCC).

National (Wales) Policy

3.2 Legislation, national and local planning policies relevant to the Proposed Development are summarised below.

3.3 The Wellbeing of Future Generations (Wales) Act 2015, the Environment (Wales) Act 2016, Future Wales - the National Plan 2040, published February 2021 ('Future Wales'), Planning Policy Wales, Edition 12 published February 2024 ('PPW'), and the accompanying Technical Advice Notes (TANs) set out the national planning policies of the Welsh Government.

3.4 The Development Plan for the Proposed Development is Future Wales and the Bridgend County Borough Council (BCBC) Local Development Plan, adopted March 2024 (the 'LDP').

3.5 A summary of relevant planning policies and guidance, including the above, is provided below.

The Wellbeing Future Generations (Wales) Act 2015

3.5 The Wellbeing of Future Generations (Wales) Act 2015 creates a legal obligation on public bodies to improve, amongst other things, the environmental well-being of Wales. It also compels public bodies to set objectives that contribute to achieving seven well-being goals, including:

- A prosperous Wales, described as '*An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work*;
- A resilient Wales, described as '*A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)'* and
- A globally responsible Wales, described as '*A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being*.'

Environment (Wales) Act 2016 (as amended)

3.6 The Environment (Wales) Act 2016 (as amended) places a duty on the Welsh Ministers to reduce GHG emissions in Wales by at least 100% in 205024. The target of net zero emissions (rather than 80% as originally stated in the Act) reflects the Welsh Government's acceptance of the independent

CCC recommendation that Wales could achieve a net zero reduction in emissions, which had previously been considered unfeasible. The Environment (Wales) Act 2016 (as amended) requires Ministers to set a series of interim targets and five-year carbon budgets to achieve the 2050 target. For 2021-26 this stands at 37% reduction compared to the baseline and for 2026-30 this is set at an average of a 58% reduction.

Future Wales – the National Plan 2040 (February 2021)

3.6 Future Wales is the national development framework, setting the direction for development in Wales to 2040. It addresses key national priorities, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

3.7 Regarding climate change, Future Wales recognises that changes to our climate and weather patterns will have a significant impact on well-being on both current and future generations. Increasing temperatures and extreme weather events are putting pressure on ecosystems, infrastructure, built environment and our unique landscape and cultural heritage, which all contribute to social, economic and ecological resilience.

3.8 Climate change is identified as an equality issue as it will disproportionately affect the most vulnerable communities in Wales and the wider world. This is despite the most vulnerable communities historically contributing least to the problem of climate changing emissions. Vulnerable communities are more likely to be exposed to the risks and impacts of climate change without the ability to cope with or recover from those impacts.

3.9 It is noted that it is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with PPW will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.

3.10 Regarding energy generation, Future Wales identifies that Wales can become a world leader in renewable energy technologies. Wales' wind and tidal resources, potential for solar and wind generation, its support for both large and community scaled projects and commitment to ensuring the planning system provides a strong lead for renewable energy development means it is well placed to support the renewable sector, attract new investment and reduce carbon emissions.

3.11 Future Wales contains two policies (17 and 18) of specific relevance to this project.

3.12 **Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure** – expresses strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. The policy states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency.

3.13 In respect of wind development, Policy 17 states that all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. It also expects proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.

3.14 **Policy 18 – Renewable and Low Carbon Energy Developments of National Significance** – deals with Developments of National Significance ('DNS'). It is a criteria-based policy which states that such developments will be permitted (subject to policy 17) and the following:

1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the

surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);

2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;
3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured);
4. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;
5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;
6. there are no unacceptable adverse impacts on statutorily protected built heritage assets;
7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;
8. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);
9. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;
10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;
11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.

3.15 Policy 18 also requires that the cumulative impacts of existing and consented renewable energy schemes should also be considered.

3.16 In addition to topic-based policies, Future Wales establishes 4 regions and policies appropriate to them. BCBC is within the 'South East' region in which it is noted that decarbonisation and responding to the threats of the climate emergency should be central to all regional planning.

3.17 There is strong potential for wind, marine and solar energy generation and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South East economy. Local ownership and distribution is important for ensuring communities in proximity to renewable energy development benefit from it and that the future energy system better serves Wales.

Planning Policy Wales, Edition 12 (2024)

3.18 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. PPW Edition 12 was adopted in February 2024. PPW, with the supporting TANs, Circulars and Policy Clarification letters comprise national planning policy but do not form part of the development plan.

3.19 PPW's sets out 5 'Key Planning Principles' (page 17), the fifth of which concerns 'Maximising environmental protection and limiting environmental impact' states:

"Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest. This means acting in the long term to respect environmental limits and operating in an integrated way so that resources and/ or assets are not irreversibly damaged or depleted. The polluter pays principle applies where pollution cannot be prevented and applying the precautionary principle ensures cost effective measures to prevent environmental damage." (our emphasis)

3.20 Paragraph 3.30 of PPW states that "In 2019 the Welsh Government declared a climate emergency in order to coordinate action nationally and locally to help combat the threats of climate change. The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. 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'.

3.21 Section 5.7 of the revised PPW – Energy – outlines the context to and the requirements of energy projects. Paragraph 5.7.1 states low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power.

3.22 Paragraph 5.7.2 acknowledges that overall power demand is expected to increase as a result of growing electrification of transport and heat. PPW highlights that in order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement.

3.23 Paragraph 5.7.5 highlights that planning applications for onshore generating projects in Wales which have an installed generation capacity of between 10MW and [3]50MW [sic] (there is no upper limit for onshore wind generating stations) are made directly to the Welsh Ministers under the DNS process and considered under policies in Future Wales.

3.24 Paragraph 5.7.6 stresses that the planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government's aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development.

3.25 Paragraph 5.7.7 states:

"The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance." (our emphasis)"

3.26 In terms of delivery, Paragraph 5.7.7 goes on to state that the planning system should (inter alia):

- integrate development with the provision of additional electricity grid network infrastructure;
- optimise energy storage;
- optimise the location of new developments to allow for efficient use of resources;
- maximise renewable and low carbon energy generation.

3.27 Paragraph 5.7.8 states an effective electricity grid network is required to fulfil the Welsh Government's renewable and low carbon ambitions. It advocates an integrated approach towards planning for energy developments and additional electricity grid network infrastructure. In certain circumstances, additional electricity grid network infrastructure will be needed to support the Pre-Assessed Areas in Future Wales, but also new energy generating developments more generally.

3.28 PPW paragraph 5.7.14 confirms that the Welsh Government targets for the generation of renewable energy are:

- Wales to generate 70% of its electricity consumption from renewable energy by 2030;
- One Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030; and
- New renewable energy projects to have at least an element of local ownership by 2020.

3.29 PPW states that local planning authorities should ensure "*development plan policies are supportive of renewable and low carbon energy development in all parts of Wales, direct developments to the right locations and set out clearly the local criteria against which proposals will be evaluated*" (Paragraph 5.9.10). PPW is also clear that local planning authorities should not seek to amend the PAAs identified in Future Wales within their LDPs.

3.30 Paragraph 5.9.19 sets out the key issues in determining applications for renewable and low carbon energy technologies. It states planning authorities should consider:

- The contribution a proposal will make to meeting identified Welsh, UK and European targets;
- The contribution to cutting greenhouse gas emissions; and
- The wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development.

3.31 PPW paragraph 5.9.20 states planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account:

- the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations;
- the impact on the natural and historic environment;
- cumulative impact;
- the capacity of, and effects on the transportation network;
- grid connection issues where renewable (electricity) energy developments are proposed; and
- the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so, consider whether measures to adapt to climate change impacts give rise to additional impacts.

3.32 Prior to an application being submitted, developers for renewable and low carbon energy developments are encouraged, wherever possible, to consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures.

3.33 Paragraph 5.9.22 states developers should take an '*active role in engaging with the local community on renewable energy proposals. This should include pre-application discussion and provision of background information on the renewable energy technology that is proposed'*.

3.34 Paragraph 5.9.24 states the '*Welsh Government supports renewable and low carbon energy projects that provide proportionate benefit to the host community or Wales as a whole'.*

3.35 Paragraph 5.9.25 states '*the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into and given weight in the decision making process'.*

3.36 Paragraph 5.9.26 states '*that there are significant opportunities to achieve local benefits through renewable energy developments. Some benefits can be justified as mitigation of development impacts through the planning process. In addition, developers may offer benefits not directly related to the planning process. Local authorities, where practical, should facilitate and encourage such*

proposals. The Welsh Government's Energy Service can support and advise on local involvement in developing renewable energy and benefiting from it'.

3.37 Paragraph 6.4.3, the key role that '*the planning system has to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, so to both protect against loss and to secure enhancement (with resilient ecological networks being vital for nature recovery and are networks of habitat in good ecological condition linking protected sites and other biodiversity hotspots across the wider landscape, providing maximum benefit for biodiversity and well-being'.*

3.38 Paragraph 6.4.3 also recognises '*that development needs to take place and some biodiversity may be impacted, the planning system should ensure that overall there is a net benefit for biodiversity and ecosystem resilience'.*

3.39 Section 6 of the Environment (Wales) Act 2016 requires planning authorities to maintain and enhance biodiversity in the exercise of their functions. This means that development must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. In doing so, planning authorities should have regard to both the DECCA framework; and the step-wise approach.

3.40 The DECCA framework comprises of the following attributes:

- Diversity between and within ecosystems;
- The extent or scale of ecosystems;
- The condition of ecosystems including their structure and functioning;
- The connections between and within ecosystems; and
- Adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change, for example.

3.41 The step-wise approach aims to maintain and enhance biodiversity, build resilient ecological networks and delivery net benefit for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. Enhancement must be secured by delivery a biodiversity benefit, over and above that required to mitigate or compensate for any negative impact.

Welsh Government Technical Advice Note 8 - Planning for Renewable Energy (2005)

3.42 Whilst TAN 8 remains a material planning consideration, the priority areas for wind development, highlighted in Future Wales – The National Plan 2040 present a more up to date policy position which seeks to realise the Welsh Governments targets for renewable energy capacity.

Prosperity for All: A Low Carbon Wales (2019)

3.43 Prosperity for All: A Low Carbon Wales (March 2019) set out a high-level plan to transition Wales to becoming a low carbon nation, outlining ways to reduce emissions and support the growth of a low carbon economy. It contained policies to reduce fossil fuel use in power generation and deliver on renewable energy targets, stating that 'The reduction of electricity generation from fossil fuels must be accompanied by increases in low carbon generation". The Plan also stated that "the bulk of new generating capacity should be provided by the lowest cost technologies', while also re-iterating WG support for onshore wind technology. Additionally, it highlighted WGs ambition for low carbon energy to become the main source of energy in Wales, especially as heat and transport transition to electric power.

3.44 In November 2019, WG published Prosperity for All: A Climate Conscious Wales, a climate change adaption plan setting out their approach for adapting to the impacts of climate change between 2020 – 2025. Whilst it does not contain specific policies or actions relating to renewable

energy or onshore wind, its publication alongside the Prosperity for All: A Low Carbon Wales plan demonstrates the commitment of WG to the wider issue of tackling climate change and reducing its impacts on the people of Wales.

Net Zero Wales – Carbon Budget 2 (2021)

3.45 Published in 2021, Net Zero Wales: Carbon Budget 2 (2021- 25)23 was the successor to Prosperity for All: A Low Carbon Wales. It directly relates to Wales' second Carbon Budget, but also puts in place longer term policies aimed at helping Wales achieve net zero by 2050. Prominent commitments include an additional 1 GW of renewable capacity to be installed by 2025, and additional electricity supply to come exclusively from decarbonised fossil fuel power plants by 2035 at the latest. It also contains policies relating to increasing low carbon and renewable generation, specifically Policy 22 - Increasing renewable energy developments on land through our planning regime, which highlights the role of planning documents Future Wales – The National Plan 2040 (Future Wales) and PPW 12, in supporting the consenting and development of large scale (onshore) energy projects. These are discussed more fully in the Planning Framework section. Net Zero Wales contains a raft of policies aimed at decarbonising most transport solutions and moving them to electric power by 2050, and also outlines the WG's ambition for increased electrification of industrial processes.

Energy Generation in Wales (2022)

3.46 Energy Generation in Wales (2022)24 is a series of annual updates which provide a picture of energy generation within Wales and is a consistent measure of progress against WG energy targets. The report notes we supply the equivalent of approximately 56% of the annual consumption of energy is from renewables and notes progress on working towards a target of 70% by 2030. The report further notes that the energy consumption from renewables is up 5% from 2019 – being the last year before the disruption by the COVID pandemic.

3.47 The report further notes that 86% of 1 GW local ownership target has been achieved and estimates that 33% of total electricity generation in Wales comes from renewable sources. As highlighted in the WG 'Energy Generation in Wales (2022)" report, onshore wind deployment in Wales during 2020 was at its lowest point in a decade.

3.48 Turbine technology has advanced considerably during this period. Despite the relative lack of deployment activity, it is clear that this position is changing, due to the increased number of new applications in the UK utilising the latest generation of technology. In a Welsh context this is reflected in the increased number of DNS proposals for windfarms and provides evidence for the increased desire realise the development potential of this type of technology and in its contribution to the renewable energy targets of both the Welsh and UK Governments. The technology advancements were recognised by the WG during the preparation of the evidence base for Future Wales in 2019 - the methodology used to define the PAA boundaries included an assessment of wind turbines with up to 250 m blade tip heights as the maximum height scenario expected to be proposed. Nonetheless, proposals at greater dimensions (260 m tip heights) are already being proposed elsewhere in the UK.

Renewable Energy in Wales (2022)

3.49 Against the backdrop of COP 26 in late 2021, the looming energy price crisis and the ever-present climate emergency, the Climate Change, Environment and Infrastructure (CCEI) Committee's commissioned a report which focused its attention on the steps being taken by the WG and what steps need to be taken to stimulate renewable energy generation in Wales. The report produced Renewable Energy in Wales 2022.

3.50 The Chair of the CCEI Committee noted

"*Wales' geography and topography offer abundant opportunities for renewable energy development, both on land and offshore. If these opportunities are seized, Wales can go beyond meeting domestic energy need to become a world leader in renewable energy production, supplying clean, affordable energy across the UK and beyond. But there are significant, long-standing barriers to development that must be addressed, and urgently, for Wales to unlock its full renewables potential. A lack of grid capacity and a complex and slow consenting regime, amongst other things, are holding back the work of developing a more sustainable energy future. If left unaddressed, there is a real risk Wales will fail to meet its climate change commitments – losing out on the social and economic benefits the renewable energy revolution offers*"

3.51 The Renewable Energy in Wales (2022) report published 17 recommendations whish are seen as targeted actions to invigorate the identified constraints to achieving the renewable energy targets and net zero carbon energy production.

3.52 Issues highlighted which would be addressed by the 17 recommendations are:-

- The Electricity Grid
  - Welsh Government action to develop the grid in Wales
  - Lack of grid capacity is constraining renewable energy development
  - Cost of grid connection
  - The pathway to grid infrastructure investment
  - Ambitions for a Wales Energy System Architect
- Consenting and licensing
  - Lack of capacity and resources for timely decisions
  - Particular challenges exist for marine energy developments
  - Lack of a robust marine evidence base
  - A new infrastructure consenting regime for Wales
- Opportunities to scale up community and local energy in Wales
  - Increasing 'shared ownership'
  - Improving access to public land
  - Supportive public procurement practices
  - The role of Ynni Cymru
  - Community benefit arrangements.

Energy Policy in Wales

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

Development Plan

3.54 The development plan for the Site for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the BCBC Local Development Plan (LDP) 2018-2033, adopted in March 2024.

3.55 The LDP has been prepared by Bridgend County Borough and adopted in accordance with Regulation 25 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

3.56 **Policy SP3: Good Design and Sustainable Placemaking** states that all development should contribute to creating high quality, attractive, sustainable places which enhance the community in which they are located, whilst having full regard to the natural, historic and built environment by,

1) Demonstrating alignment with the principles of Good Design; and
2) Demonstrating a Sustainable Placemaking approach to their siting, design, construction and operation.

3.57 **Policy SP4: Mitigating the Impact of Climate Change** states that all development proposals must make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. Means of achieving this may include:

1) Having a location and layout which reflects sustainable transport and access principles, thereby reducing the overall need to travel (active travel);

2) Having low / zero carbon energy requirements by reducing energy demand, and promoting energy efficiency;

3) Utilising low carbon, local materials and supplies (adopting circular economy principles);

4) Encouraging the development of renewable and low/zero carbon energy generation;

5) Having a design, layout and landscaping which:

(i) helps wildlife and habitats to adapt to the changing climate;

(ii) assists cooling of the urban environment, including the use of passive building techniques where appropriate;

6) Using resources more efficiently, including averting waste generated from demolition and minimising waste water use and pollution;

7) Directing development away from flood risk areas and avoiding development that increases the risk of flood and coastal erosion, including through the deployment of sustainable urban drainage systems where relevant.

All applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaption.

3.58 **Policy SP10: Infrastructure** states that all development proposals must be supported by sufficient existing or new infrastructure. In order to mitigate likely adverse impacts and/or to integrate a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. This will be secured by means of planning agreements/obligations where appropriate.

3.59 The requirements for such agreements will include consideration of and appropriate provision for:

1) Affordable housing;

2) Economic Infrastructure – Telecommunications / broadband infrastructure;

3) Utilities;

4) Educational facilities and/or their upgrades;

5) Green infrastructure and outdoor recreation;

6) Renewable energy and low carbon technologies;

7) Transportation Infrastructure - Improvements to the highway network, including walking and cycling routes (Active Travel) and public transport;

8) Protection, enhancement and management of the natural, historic and built environment;

9) Community facilities, health facilities and/ or their upgrades;

10) Waste management and recycling facilities;

11) Initiatives to manage and mitigate the impact of climate change;

12) Improvements to the public realm; and

13) Welsh Language.

Infrastructure providers will be consulted on relevant planning applications.

3.60 **Policy SP13: Renewable and Low Carbon Energy Development** states that

1) Renewable and low carbon development proposals which contribute to meeting national and local renewable and low carbon energy and energy efficiency targets will be permitted where:

a) It can be demonstrated that there will be no unacceptable impacts on the natural and historic environment or local communities (such as noise and air pollution) and that no other unacceptable cumulative impacts will arise;

b) The proposal (inclusive of its associated infrastructure) has sought to minimise the landscape and visual impact through its design and micro-siting, particularly where in close proximity to homes and tourism receptors;

c) Proposals make provision for the appropriate restoration and after-care of the land for its beneficial future re-use;

d) The proposal can facilitate a connection to the grid network;

e) There would not be an unacceptable impact on access and highway safety; and

f) There would not be unacceptable impact on the amenity of residential properties or tourist accommodation.

2) The following Local Search Areas (LSAs) are identified as areas considered suitable for wind and solar energy development:

a) LCA1: Llangynwyd Rolling Uplands & Forestry (Suitable for Wind Energy);

b) LCA8: Ogmore Forest and Surrounding Uplands (Suitable for Wind Energy); and

c) LCA 12: Newton Down Limestone Plateau (Suitable for Solar Energy).

3.61 Within the Local Search Areas (LSA), proposals for wind and solar energy generation will be permitted subject to criteria 1a), 1b), 1c), 1d), 1e) and f) and other relevant policies in this plan. Proposals for other development within these areas will only be permitted where they can demonstrate that they would not unacceptably prejudice the renewable energy generation potential of the LSA and the Future Wales' Pre-Assessed Areas for Wind Energy. LSA 8 is partly located within Pre-Assessed Area 9 for Wind Energy. In accordance with the hierarchical approach of national planning policy, any proposal within this area should not prejudice the ability for large scale wind developments (>10MW) to come forward. Landscape considerations have already been taken into account in Future Wales and Criteria 1(b) should not apply to those parts of LSA 8 within Pre-Assessed Area 9.

3.62 **Policy SP17 - Conservation and Enhancement of the Natural Environment** states that "Development which will conserve and, wherever possible, enhance the natural environment of the County Borough will be favoured. Development proposals will not be permitted where they will have an adverse impact upon:

- The integrity of the County Borough's countryside;
- The character of its landscape;
- Its biodiversity and habitats; and
- The quality of its natural resources including water, air and soil."

3.63 Areas having a high and/or unique environmental quality will be protected and the following strategically important areas within the County Borough will specifically be protected from inappropriate development which directly or indirectly impacts upon them.

SP17(1) Natura 2000 Network Sites (including Special Areas of Conservation (SACs);

SP17(2) Sites of Special Scientific Interest (SSSIs);

SP17(3) Kenfig and Merthyr Mawr National Nature Reserves (NNRs);

SP17(4) The Glamorgan Heritage Coast

3.64 **Policy SP18: Conservation of the Historic Environment** states that BCBC has a rich and diverse built heritage and historic environment. Development proposals must protect, conserve, and, where appropriate, preserve and enhance the significance of historic assets, including their settings. In particular, there is a general presumption in favour of the preservation or enhancement of the significance of historic assets and their settings including:

1) World Heritage Sites

2) Scheduled Monuments

3) Archaeologically Sensitive Areas and Archaeological Remains

4) Listed Buildings

5) Conservation Areas

6) Historic Parks and Gardens

7) Historic Landscapes

3.65 Any application for listed building or conservation area consent will need to be accompanied by a Heritage Impact Statement in accordance with the Historic Environment (Wales) Act 2016.

3.66 **Policy DNP1** controls development in the countryside except for specific identified purposes.

3.67 **Policy DNP4: Special Landscape Areas (SLAs)** seeks to retain or enhance the character and distinctiveness of such areas, requiring appropriate design and materials.

3.68 **Policy DNP8: Green Infrastructure** states development proposals will be required to integrate, protect and maintain existing green infrastructure assets and to enhance the extent, quality, connectivity and multi-functionality of the green infrastructure network. Where the loss or damage of existing green infrastructure is unavoidable, appropriate mitigation and compensation will be required.

3.69 All developments must seek to maximise, as far as practicable, the amount of green infrastructure on the site, as well as the interconnectedness of green infrastructure within and around the site to the wider green infrastructure network. Development must also maximise opportunities to achieve multi-functionality by bringing green infrastructure functions together.

3.70 All major developments will be required to submit a Green Infrastructure Assessment.

4 PLANNING POLICY ASSESSMENT

4.1 This section provides an assessment of the Proposed Development with regard to the various environmental and technical topics that are examined in the ES and supporting technical reports. This section will assess the findings against the relevant planning and renewable energy policies which has been set out in Section 3 of this PS.

4.2 The assessment focusses on the provisions of Future Wales as the principal policy for decision making for DNS applications, whilst also referring to other relevant national planning policy and the LDP. The assessment also considers the compliance of the Proposed Development with the Wellbeing of Future Generations (Wales) Act, 2015. The key benefits that would arise from the Proposed Development are also described.

4.3 Having regard to the positive planning policy context in respect of renewable energy development set out above, it is clear that a presumption in favour of sustainable development exists in respect of the proposal, particularly under the considerations set out under PPW. However, the planning policy context indicates that any planning application must also address the following key topics:

- Principle of the Proposed Development
- Location of the Proposed Development;
- Land, Soils and Peat;
- Landscape and Visual;
- Highways and Traffic (in respect of temporary construction works);
- Historic Environment;
- Shadow Flicker, Aviation and Telecommunications;
- Ecology and Ornithology;
- Geology and Hydrogeology;
- Hydrology and Flood Risk; and
- Socioeconomics.

4.4 The key matters with reference to specific topics is set out below.

The Principle of the Proposed Development

4.5 The UK and Welsh Government have declared a climate emergency in the last six years. In response, both UK and Welsh Government have legislated a net zero emissions target by 2050.

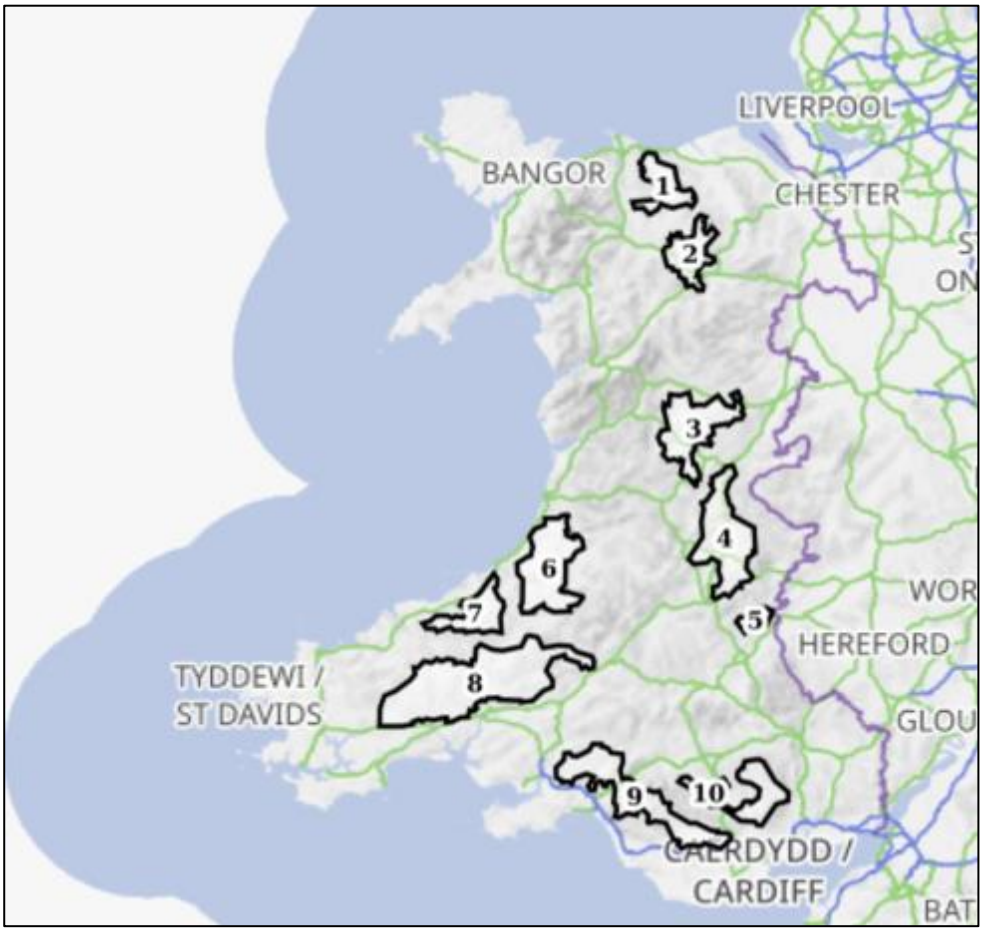
4.6 Planning policy in Wales is also clear in its support for the principle of renewable energy development, primarily through Future Wales and PPW at a national level, and the BCBC LDP and associated policy at local level.

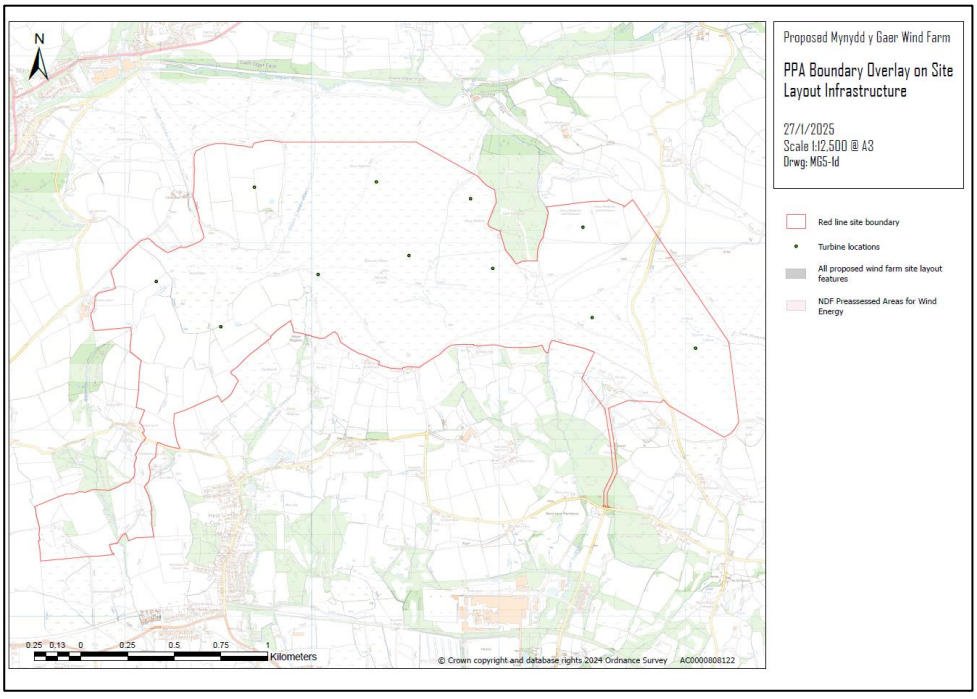
4.7 The Proposed Development will have an installed generating capacity of approximately 75 MW, which will be a significant contribution to the generation of low carbon electricity in Wales, and as such is strongly supported in principle by Future Wales and PPW due to its role in tackling the climate emergency and increasing energy security.

Location of Proposed Development

4.8 The Welsh Government's NDF; Future Wales – The National Plan 2040 (Policy 17) identifies Pre-Assessed Areas (PAAs) for Wind Energy where there is presumption in favour of large-scale wind energy development within these areas. 10 of the 11 proposed turbines lie within a PAA, Future

Wales Pre-Assessed Area 9. The images below the PAAs across Wales and the PAA boundary overlay site layout infrastructure for Mynydd y Gaer (MG5-1d).





4.9 As part of the PAA exercise, the Welsh Government has modelled the likely impact on the landscape of wind energy development in these areas and concluded them to be capable of accommodating this type of development in an acceptable way. The methodology used in defining the boundaries of

PAAs for Wind Energy considered the intervisibility between nationally designated landscapes and wind turbines up to 250m blade tip height, as this represented the maximum height scenario in terms of turbine sizes likely to come forward in applications at the time.

4.10 The Strategic Policy for Renewable Energy is SP4 of the LDP supports the development of renewable energy sources. Local policy provides support for renewable energy developments in the right locations and emphasises there will need to be a balance between the need for increased levels of renewable energy development and the need to protect sensitive areas.

4.11 As such, national and local policy supports the conclusion that, whilst acknowledging there will be resulting significant landscape character effects, the landscape and visual impact of the turbines is acceptable.

Key Benefits of the Proposed Development

4.12 The Proposed Development will yield some benefits including:

- Job creation during construction;
- The long term aim of bringing down energy costs;
- Generation of green local power;
- Ability to power local users. The applicant is exploring the opportunity to provide power for BCBC and large local employers like Rockwool.
- Creation of Junction 36 Travel Hub to utilise the power and change the way we travel;
- Creation of Tir Isha Employment Zone to utilise the power and create employment in the area;
- Sponsorships in the local community;
- Ecological enhancements across Coity Wallia Common;
- Supporting the Board of Conservators and Coity Wallia Commoners Association; and
- Greater access to the outdoors for social wellbeing.

Environmental Impact of the Proposed Development

Landscape and Visual

4.13 As recognised in 'Location of the Proposed Development' above, 10 of the 11 proposed wind turbines are within Future Wales Policy 17 (PAA 9). The one turbine outside the PAA is 81km from the western edge of PAA 9. There is a presumption in favour of windfarm development within PAAs.

4.14 Chapter 5 Landscape and Visual Impact Assessment (LVIA) of the ES considers the likely effects of the Proposed Development on landscape and visual resources. The LVIA considers the likely effects of the Proposed Development on nearby communities and individual dwellings.

4.15 The supporting Residential Visual Amenity Assessment (RVAA) has been prepared to assess the likely visual effects of the Proposed Development on residential properties within the 2 km study area. The operational stage of the Proposed Development has been considered only.

4.16 Future Wales Plan Policy 18 states that proposals for renewable energy projects will be permitted subject to there being '*no unacceptable adverse visual impacts on nearby communities and individual dwellings*'. The assessment concludes that although there are some significant adverse visual effects on local residential areas these are within 2km of the Proposed Development. None of the effects are so unacceptable so as to reach risk and vulnerability assessment tool (RVAT), where it would potentially affect '*living conditions'*.

4.17 The Site falls mostly within the Special Landscape Area (SLA) Mynydd y Gaer. There are other SLAs within 10km of the Site which would potentially have intervisibility with the Proposed Development. The closest is Mynydd Hugh and Llantrisant Forest SLA which lies immediately to the east and adjoins Mynydd y Gaer SLA. The Northern Uplands SLA lies 2.32 km to the north at its closest point. The Western Uplands lies some 5.5km to the west and this SLA adjoins Margam SLA which falls partly within the 10km buffer. Laleston SLA lies 5.98km to the south west and Llanharry Surrounds SLA lies 3.06km to the south east with the Upper and lower Thaw Valley SLA lying beyond this and to the south of the M4 motorway at 4.87km. The effects on these SLAs are discussed as part of the landscape assessment in Appendix 5B of the ES.

4.18 **Policy DNP4** of the LDP deals with SLA, to help retain or enhance the character and distinctiveness of such areas, requiring appropriate design and materials as well as a landscape assessment. The identification/assessment of SLAs in Bridgend and neighbouring local authorities has recognised that both the location of the Strategic Search Areas and consented wind farm developments.

4.19 The nearest National Park to the Site is the Brecon Beacons National Park, which lies approximately 19.5km to the north at its nearest point. The northern edge of Exmoor National Park lies some 36km to the south from the nearest proposed wind turbine. There would be very little to no intervisibility between the proposal and these national parks. The closest National Landscape (formerly known as an Area of Outstanding Natural Beauty) is the Gower which is 30.5km to the west. There is almost no potential intervisibility with the Proposed Development and this national designation.

4.20 A series of 32 representative viewpoints were identified within the study area. These visual receptors are to be found within 40km of the Proposed Development and within the turbine tip height Zone of Theoretical Visibility (ZTV) included in the planning application. 25 of these representative viewpoints are within the 15km buffer of the Proposed Development. The effects on these views are discussed as part of the landscape assessment in Appendix 5C of the Environmental Statement.

4.21 Future Wales Plan Policy 18 also states that, '*the cumulative impacts of existing and consented renewable energy schemes should also be considered*.' Scenario 2 of the cumulative landscape and visual assessment (CLVIA) in the LVIA has assessed this series of windfarm developments i.e. proposed scheme + operational + consented schemes. The majority of the cumulative schemes in the study area is made up of wind farms that are already in operation, which forms part of the baseline assessment in Scenario 1, in the LVIA. As more windfarms become present in the landscape, in some cases these will have the greater contributing influence to the level of effect. In Scenario 1, 12 LCAs / VSAAs are predicted to experience significant effects. In Scenario 2, with the addition of the consented schemes, 7 of these 12 areas are predicted to have additional cumulative effects which result in the combined cumulative schemes having an equal (type 1 cumulative effect) or greater contributing effect (type 3 cumulative effect) to the overall level of significance rather than the proposed scheme.

4.22 The LVIA also demonstrates compliance with national and local planning policy. This includes Policies 17 and 18 of Future Wales and a particular landscape and visual focus on LDP policies (SP17- Conservation and Enhancement of the Natural Environment), SP13 – Renewable Energy and Low Carbon Energy Development, DNP1 – Development in the Countryside and DNP4 – Special Landscape Areas.

4.23 There is therefore no reason in terms of landscape and visual impact that the Proposed Development should not proceed.

Highways and Traffic

4.24 A Transport ES Chapter has been prepared to assess the transport related considerations of the Proposed Development. The TS demonstrates the compliance of the Proposed Development with PPW Edition 12 (2024) and Technical Advice Note 18: Transport (TAN 18).

4.25 The planning application will also include a Construction Traffic Management Plan (CTMP). This document will provide detailed information on expected construction vehicle movements and vehicle types, journey considerations for construction and maintenance staff, proposed access junction arrangements, the suitability and details of the proposed haulage route, information on the traffic management measures to be implemented, and will detail the construction working hours and duration of works.

4.26 Construction access for the project will be via the A473 at Pencoed, continuing onto the B4280 and Bryngarn Road. The construction phase is anticipated to last approximately 24 months. During peak activity, heavy goods vehicle (HGV) movements are expected to reach approximately 64 movements per day (32 inbound and 32 outbound).

4.27 It is recognised that there are sensitive receptors in proximity to the site boundary. However, based on the projected construction traffic flows, and the mitigation provided, these levels are considered low enough to avoid any significant environmental effects.

4.28 Once operational, the wind farm will be managed remotely and will require only occasional site visits for maintenance, as needed. The associated vehicle movements will have a negligible impact on the surrounding highway network.

4.29 Overall, it is considered that there would be only negligible transport and highway related impacts arising from the Proposed Development. The Proposed Development also demonstrates compliance with PPW 12, Policy 18 of Future Wales and Policy SP10: Infrastructure of the LDP. Therefore, we consider there is no reason for not permitting the development in this regard.

Historic Environment

4.30 Policy 18 of Future Wales requires that development will be considered acceptable as long as '*there are no unacceptable adverse impacts on statutorily protected built heritage assets'*. Similarly, Policy SP18: Conservation of the Historic Environment of the LDP requires '*development proposals to protect, conserve and, where appropriate, preserve and enhance the significance of historic assets including their settings'*

4.31 ES Chapter 9 confirms there are multiple receptors identified within and around the Proposed Development area that could be affected by development. These comprise a range of archaeological sites, features and areas from a wide time range.

4.32 The two main identified impacts comprise destructive ground-breaking activity during the construction phase of the Proposed Development, and impacts to the setting of high value receptors during the construction and operational phases of development.

4.33 The receptors range in both sensitivity and in the potential magnitude of the impacts, however a potentially significant effect has been identified on three clusters of identified receptors that appear to relate to post-medieval deserted rural settlement sites, and the general archaeological potential of the area, largely through potentially destructive construction works.

4.34 A potentially significant effect has also been identified on the setting of scheduled monument GM084 Mynydd y Gaer hillfort, during disruptive construction works and through visual changes during the operational phase.

4.35 Current mitigation includes further archaeological surveys and investigations to improve the current understanding of, and potential impacts upon, all identified receptors. It is anticipated that this can then be used to reduce the significance of the effect on these receptors, thereafter demonstrating compliance with Policy 18 of Future Wales and Policy SP18 of the LDP.

Ecology

4.36 Policy 18 of Future Wales requires that development will be considered acceptable as long as '*the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity'*. This is further supported in PPW 12 where policy seeks to '*reverse the decline in biodiversity and increase the resilience of ecosystems'* and recognises that if development does not to take place and biodiversity is impacted '*the planning system should ensure that overall, there is a net benefit for biodiversity and ecosystem resilience'.* A biodiversity strategy which includes the necessary habitat creation, restoration and enhancement measures has been prepared as part of the planning application. Protected and notable species protection measures would also be factored into the Proposed Development.

4.37 Section 6 of the Environment (Wales) Act 2016 requires '*planning authorities to maintain and enhance biodiversity in the exercise of their functions. This means that development must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. In doing so, planning authorities should have regard to both the DECCA framework and step-wise approach'*. Taking into account the mitigation and the proposed biodiversity measures during construction and operation, no significant adverse effects are likely to occur with respect to Terrestrial Ecology and an overall net benefit for biodiversity would be delivered. Several ecological receptors would experience beneficial effects in the long term, these include Wern Tarw Woodland, wet heath habitat, dormice and grassland fungi.

4.38 Policy SP17: Conservation and Enhancement of the Natural Environment of the LDP states that '*Development which will conserve and, wherever possible, enhance the natural environment of the County Borough will be favoured'*.

4.39 The policy also states that '*areas having a high and/or unique environmental quality will be protected and the following strategically important areas within the County Borough will specifically be protected from inappropriate development which directly or indirectly impacts upon them*…..such as SP17(2) Sites of Special Scientific Interest (SSSIs). The closest nationally designated site is Brynna a Wern Tarw SSSI which was located 70m from the Proposed Development's haul road.

4.40 For ornithology, over two years of field data and desktop research have been compiled for the Site regarding ornithology receptors. The Site itself does not impinge on any designated sites and is also not functionally linked to any sites with key ornithological receptors. The area is used by a handful of species of conservation concern. Birds are typically impacted by onshore wind developments through construction, loss of habitat, displacement, collision and latterly decommissioning. All these factors have been considered in the reporting utilising industry standard modelling to support the assessment process. Impacts are not expected to negatively affect regional population levels of any species.

4.41 Red kite, herring gull, golden plover and goshawk are four species which show the highest impacts. Data shows that goshawk breeds off site, but red kite do use the area, notably the west end of the site, during the post breeding period. Loitering birds in this area have driven the numbers to a relatively high level in collision risk modelling. Similarly, numbers are high for herring gull in this area. Skylark have been noted to breed within the current site boundary. Best practice in construction and monitoring, including an ecological clerk of work on site, will take place for base level mitigation.

Geology and Hydrogeology

4.42 Chapter 15 of the ES on Geology and Hydrogeology confirms the Proposed Development has been designed to avoid sensitive water features and sensitive habitats. Watercourse crossings have been kept to a minimum. The primary design considerations with respect to superficial deposits will

minimise the overlap between infrastructure and the deepest areas of superficial deposits on Site and minimise disruption to natural drainage pathways.

4.43 The SGS EIA assessment is developed for an 11No Turbine scheme, on high ground at Mynydd y Gaer. The EIA looks at the potential impacts to geology, hydrology and hydrogeology as a result of the proposals. The EIA concentrates on the impact of turbine foundations, access roads and borrow pits.

4.44 The area has a history of Coal Mining activity, which has been assessed in the supporting Coal Mining Risk Assessment, with data obtained from the Mining Remediation Authority (formerly the Coal Authority), and geological map data. The shallowest coal seam is considered to be at 55m depth, with no mine entries in the scheme area.

4.45 A walkover survey and Phase 1 survey, have noted a peat mantled topography, over glacial till. There were no visual signs of land instability. The EIA finds that ground investigation will be required prior to the construction phase, to understand specific ground models for the scheme features.

Hydrology and Flood Risk

4.46 A Flood Consequences Assessment (FCA) and drainage strategy has been produced in support of the application to ensure flood risk and hydrological impacts are managed appropriately and in accordance with the guidance detailed in PPW and Technical Advice Note 15 (TAN15).

4.47 The New Flood Map for Planning data has been used as the ‘best available information’ on flood risk to inform the planning application. As indicated by the Flood Map for Planning, the site falls within Flood Zone 1, which is classified ‘as areas with a less than 0.1% (1 in 1000) chance of flooding from rivers each year, including the effects of climate change.’

4.48 The Natural Resource Wales (NRW) Flood Risk from Surface Water and Small Watercourses map indicates most of the site is not at risk of surface water flooding. Areas of ‘low’ to ‘high’ risk have been identified within the extent of the site boundary. This is attributed to ordinary watercourses at the site and depressions in the ground surface.

Land, Soils and Peat

4.49 The majority of the land within the Site is characterised by soils from the Gelligaer Association, which comprises loamy soils overlain by a thin peaty topsoil of approximately 0-200mm thickness. Limited areas to the south east of the site overlay glacial till and comprise more poorly drained soils of the Wilcocks soil association, where soil profiles comprising thicknesses of peat comprising in excess of 30cm may be located.

4.50 Two peat probing surveys have been conducted on the Site. The first, in September 2022, has been used to inform the design of the proposal, alongside other environmental considerations. A second survey, based on the proposed layout of the Project, was undertaken in November 2024. Both surveys show, as expected, that the majority of the site comprises soil profiles with between 0-200mm thickness of peat with thicknesses of between 500-600mm identified on the fringe of the area of one turbine.

4.51 A soil management plan will be produced as part of the Environmental Statement to identify appropriate measures to strip, store and restore soils affected by the Project. This will include specific measures relevant to the conservation of peat resources, where they occur within the Project.

Planning Policy Assessment Conclusions

4.52 The Assessment above considers that the Proposed Development would not result in any unacceptable adverse effects in terms of environmental or technical considerations and would therefore accord with the key policies in Future Wales, namely Policies 17 and 18, other relevant policies of the NDF and relevant LDP policy. The proposal is therefore in conformity with the Development Plan as a whole.

4.53 The Proposed Development would improve the economic, social, environmental, and cultural well-being of Wales, in accordance with the sustainable development principle, under Section 3 of the Well-being of Future Generations (Wales) Act 2015 (WBFG Act). It is also in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being goals as set out as being required by Section 8 of the WBFG Act.

4.54 Section 5 of PPW highlights where contribution to be made to each of the seven goals of the WBFG Act including the following with reference to the goals set out in the Act:

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

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

5 PLANNING BALANCE AND CONCLUSION

5.2 As a result of the planning policy assessment, the key matters to be addressed in the planning balance are as follows:

- The overall principle of the proposed renewable energy development in accordance with national and local planning policy;
- The location of the Proposed Development in Future Wales Policy Pre-Assessed Area for Wind Energy; and
- The overall need for renewable energy to generate electricity to meet international and national targets.

5.3 Future Wales and PPW strongly support renewable energy and renewable energy targets. They also recognise the significant energy resource that can be provided by onshore wind development. However, both documents make it clear that any development of this nature needs to demonstrate acceptability in terms of minimal adverse environmental effects and careful consideration of development location.

5.4 The Proposed Development is considered an appropriate location (PAA 9) in relation to national planning policy. Notwithstanding, one of the 11 wind turbines is not within a PAA, the LVIA has demonstrated that the Proposed Development can be accommodated without detrimental effect on the surrounding landscape.

5.5 To combat climate change through decarbonisation of the energy system, Wales and the UK, require new renewable sources of energy, which will ensure that a secure supply of electricity is available to meet the increased future demand. The provision of new renewable energy capacity (through Wind) will help the Welsh Government meet legally binding national and international commitments on climate change.

5.6 This Planning Statement demonstrates that the Proposed Development accords with local and national planning policy and highlights the substantial need for this type of development to meet targets for renewable energy generation.

5.7 Future Wales is clear that decision makers must give significant weight to Wales's need to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030. We recognise that the Proposed Development will result in some adverse effects, it is considered that these impacts are outweighed by the Proposed Development's contribution to meeting national and international renewable energy targets, in an 'appropriate' location and providing other residual benefit to the local and wider communities and economies.

5.8 The proposal is therefore in conformity with the Development Plan as a whole. This is **the** material consideration and carries full weight in the consideration of the acceptability in planning terms of the Proposed Development.

5.9 Therefore, it can accordingly be concluded that the Proposed Development should be granted planning permission.

Appendix A

Site Location Plan

CENIN

HWS

Hamon Wind and Solar Design

Mynydd y Gaer Wind Scheme
Site Location Plan

Drwg: MG4-11a

21/01/2025

Scale 1 : 20,000 @ A3

Drawn by RAH: Hamon Wind and Solar Design