

1. Introduction

1.1 This Planning Statement Further Addendum accompanies the planning application by RES Limited (RES) for the construction of a wind farm with seven turbines each rated at up to 3.6MW per turbines, hence with a maximum installed capacity of 25.2MW. It is not part of the Environmental Statement (ES) which was also submitted with the application.

1.2 This Further Addendum has been prepared at the invitation of the Planning Inspectorate in the light of the publication of the final version of the National Development Framework - Future Wales 2040₁ which was issued concurrently with the latest version of Planning Policy Wales (PPW11)₂ in February 2021. At the same time, the Welsh Government confirmed that it had revoked Technical Advice Note 8₇ dating from 2005 which dealt with renewable energy and especially its approach to defining seven Strategic Search Areas across Wales within which major onshore wind energy would be expected to be located. This has necessitated a fresh examination of the material contained in the original Planning Statement, so as to facilitate the consideration of the proposal at the forthcoming Hearing procedures. This Further Addendum therefore replaces in its entirety the Addendum submitted in December 2020, and also the sections in the original Planning Statement dealing with the then PPWales (Version 10) and TAN8.

1.3 This Addendum has been prepared on behalf of RES by David Stewart, a Chartered Town Planning Consultant and Principal in the firm of David Stewart Associates. His experience in the context of wind energy development across the United Kingdom is set out in the original Planning Statement.

2. Evolution of the National Development Framework: Future Wales 2040 (NDF).

2.1 The first Addendum was prepared in response to the September working draft of the NDF which was placed before the Senedd for scrutiny in September 2020₃. This draft had been through a major period of consultation with bodies and the general

public (Strategic and Spatial Choices: the NDF Spatial Strategy 2019⁴) and had elicited many hundreds of responses. The Welsh Government had published a Consultation Report document⁵ - alongside the version of September 2020 in which it set out the basis of the representations received and its responses to them, which had been incorporated into the final draft version.

2.2 The place of the NDF in the Welsh planning hierarchy is that it will form the top of the three tier approach to the statutory development plan in each area. The middle tier is represented by Strategic Regional Plans and the lower tier by the Local Development Plans. As set out in page 15 of the NDF, Planning Policy Wales (PPWales) remains as the overall policy-making vehicle for Wales but it is not part of the Development Plan, being instead a very significant material consideration in the decision-making process. As noted above, a new version of PPWales was published alongside the NDF and the relevant changes that are identified between versions 10 and 11 will be referred to later in this addendum. What the NDF does is to set out the aims and intentions of the Welsh Government in a clearly defined form in what will be part of the statutory development plan in each area and thus be given the highest level of weight in the taking of decisions on individual applications.

2.3 In order to appreciate the stage we have reached in the process, it is helpful to look very briefly at the consultation draft of 2019 which led to large numbers of representations being received. It is especially relevant to do this here because policies on renewable energy and especially onshore wind in Wales were far and away the most controversial of the topics which elicited responses. Given the past history of concerns over the development of wind energy since the very early 1990s, that is perhaps not surprising, and one can again see in the wide range of issues raised that many of the arguments that have been made over the last three decades have not gone away. There remain many in Wales at both the level of local authorities, amenity bodies and the general public who have doubts about the economics and efficacy of onshore wind, and who remain deeply concerned about the effects on the landscape and on tourism, and on ecology. There are also some who doubt the entire principle that climate change is occurring or that even if it is, doubt that wind energy is a way of tackling it.

- 2.4 The 2019 draft marked a very strong change of direction by the Welsh Government towards onshore renewables and especially wind. Since 2005, the national strategy had been directed towards major wind development taking place within one of the seven Strategic Search Areas (SSAs) set out in the Technical Advice Note 8 of 2005⁷, devised on the basis of reports from consultants to identify the preferred areas in Wales which could best accommodate a stated level of development. Those initial seven SSAs were subsequently the result of significant “refinements” (as set out in the original Planning Statement Section 7) by Arup at the request of the involved local authorities to define the boundaries more closely, and in most cases to reduce their overall area to a significant extent, and to rank potential sites within the final boundaries in order of suitability for strategic wind energy development to meet the then national targets. There had been a general presumption within the SSAs in favour of acceptance of the landscape and visual impacts of developments in such areas, and a less preferential treatment for sites that lay outside them. This approach has been followed in the subsequent iterations of PPWales up to the present time.
- 2.5 The 2019 draft NDF however took a markedly different approach. Instead of relatively constrained areas, many of which were centred on forestry land, the 2019 draft set out a spatial priority for large scale wind and solar development to be directed towards what were termed priority areas identified on a map on page 42. Of the fifteen such areas, four were exclusively for solar energy, ten were wholly or primarily for wind energy, and one had large areas for both. Two thirds of them did not form part of any of the SSAs from TAN8 and in terms of size, the overall areas included were several times larger than the total areas in TAN8. One of the SSAs (Area D) was entirely left out of the new areas, having not had a submission of a large wind farm at any time in the last 15 years. The draft stated that there would be a presumption in favour of large-scale on-shore wind and solar development in these areas, an acceptance of landscape change and a focus on maximising benefits and minimising impacts. Communities would be protected from significant cumulative impacts to avoid unacceptable situations where, for example, smaller settlements could be potentially surrounded by large wind schemes. The 2019 draft referred to a strategic review of landscape and visual impact which had identified the boundaries of the Priority Areas for Solar and Wind

Energy, as the most appropriate locations to accommodate landscape change. It was again Arup who had led the consultants in devising these Priority Areas on landscape and visual grounds, as part of the earlier evolution of the strategy, and further comments on their study work will be made in due course. There then followed in the 2019 draft a “traffic light based approach to policy” based on red (excluding large scale development in National Parks and Areas of Outstanding Natural Beauty), amber (areas not within Priority Areas which did not have explicit Welsh Government support and where proposals would be determined on their individual merits) and green (the priority areas which carried a presumption in favour of development and where the principle of landscape change was to be accepted), set out on page 37. Policy 10 in the draft set out the criteria for addressing proposals inside the Priority Areas, while Policy 11 dealt with sites outside such areas and Policy 12 gave the guidance for the protected landscapes of the National Parks and AONBs.

- 2.6 Following the consideration of the raft of representations made to the 2019 draft, the Welsh Government then published the final draft NDF in September 2020 alongside the report into Consultations when placing the draft before the Senedd.
- 2.7 The Government recognised from the representations received that the traffic light approach did not properly convey their intentions towards the new hierarchy of sites and so it was dropped. They also accepted that while it was highly desirable to identify areas where there would be a presumption in favour of onshore wind development, the use of the term “Priority Areas” was not appropriate and indeed that mixing wind and solar together in such areas was not helpful. Instead, the term was changed to Pre-assessed Areas (PAAs) to confirm that these areas have indeed been the subject of detailed strategic assessments as to their landscape and visual impacts, but these areas now only referred to a presumption for onshore wind development, rather than for wind and solar in different parts of them. As a result, the number of such areas was reduced from 15 to 10 with the solar parts of the former priority areas excluded where there were both types of renewables, and the areas adjusted accordingly. Two of the old wind priority areas from the early 2019 draft (Area 1 in Anglesey and Area 8 in the southern half of Powys) were dropped entirely and the old Area 14 which comprised two wind areas linked by a solar area

had now become two distinct PAAs separated by a corridor north-west of Caerphilly. Overlaying the old TAN8 areas onto the new PAA map demonstrated how much more extensive the 2020 areas were compared to those in TAN8.

2.8 The final version of the NDF contains eleven Future Wales Outcomes (page 56) of which one is that it looks for *“A Wales where people live in places which are decarbonised and climate resilient. The challenges of the climate emergency demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society.”*

2.9 Page 96 of the NDF affirms that the latest targets of Government are for 70% of electricity consumption to be generated from renewable energy by 2030, with 1GW of renewable energy capacity to be locally owned by 2030, and for new renewable energy projects to have at least an element of local ownership from 2020. It restates the current legal position that wind farms of 10 or more megawatts are classed as Developments of National Significance and as such will be determined by the Welsh Ministers. On page 97, there are further policy statements confirming the presumption in favour of large-scale wind energy developments in the PAAs together with the landscape change that will be involved. There is a pair of policies which follow this approach through - these being policies 17 and 18, which also cover a range of other technologies. It is of note that Policy 17 carries the statements:

“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. In Pre-Assessed Areas for Wind Energy 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 the criteria in policy 18.

Policy 18 then notes that even wind energy developments outside the PAAs will be permitted if they do not, inter alia, have an unacceptable adverse impact on the

surrounding landscape - thus defining the distinction in decision-making terms between land within and outside the PAAs. Policy 18 then goes on to set out a further ten criteria which apply to all wind energy proposals.

- 2.10 Since the NDF now postdates the adoption of the LDPs for both the Council areas affected, this means that where there is a material departure in policy terms between the documents, it will be the latest one (and of course the higher ranking one in the hierarchy) that will take greater weight in the decision-making process.

3. ARUP studies for the NDF

- 3.1 The Pre-Assessed Areas for wind energy development contained in the NDF are derived from a two stage study carried out by ARUP for Welsh Government. Whereas their original studies in preparation for TAN8 had had a very specific target figure of around 800MW of installed capacity of new wind farms in Wales by a set date of 2010, this new approach was far more open-ended, seeking instead to maximise the potential from wind and solar energy in pursuit of the new Welsh Government aims of achieving zero net greenhouse gas emissions by 2050. As a result, they looked at different scenarios as to how to address fixed and variable constraints in order to establish how such constraints might need to be weighted in order to ensure an adequate identification of sufficient land across Wales. The details of the methodology do not need to be discussed in detail at this stage, but of note is the fact that the presence of existing wind turbines in any 250m square was itself defined as a fixed constraint, and hence when the final Pre-Assessed Areas were defined on the maps there were bound to be significant differences between the old Strategic Search Areas and the new PAAs. The greater the concentration of wind farms that had been consented and built within the old SSAs, the more likely it would be that those areas would be defined as having less potential for further development, and so it has proved. With the exception of Area D in Powys/Dyfed where no major wind farm development at all had been consented, all the other SSAs had seen extensive developments over the last 18 years and so the new PAAs in the NDF utilise markedly different areas even if they generally occur in the same landscape types. In the case of PAA9 with which we are dealing in Bridgend and its neighbouring Councils this is very evident. Pen y Cymoedd is the largest development in the old SSA F, along with a number of other smaller wind farms, and the new PAA extends from the southern boundary of SSA F towards the coast to encompass not just the Upper Ogmere Wind Farm site but also the whole of the neighbouring Llynfi Afan Wind Farm which was excluded from the SSA.

- 3.2 Stage 2 of the assessment examined a range of criteria in more detail, covering landscape and visual issues, location of centres of population, grid connection, vehicular access, ecosystems, the historic environment and the contribution each area could make to the national energy targets. This led to the creation of the Pre-Assessed Areas for onshore wind that appear in the September 2020 Draft of the NDF and the final version of February 2021.
- 3.3 Of particular note for the consideration of the Upper Ogmre proposal is the difference with the ARUP reports undertaken for TAN8 and subsequent to it, compared to the NDF. TAN8 was issued in 2005 after the initial tranche of work by ARUP to establish the broad-brush areas for the SSAs, whereas in all of the SSAs the “further refinement” exercises were carried out after TAN8 had been published in association with the various Councils involved, looking in far more detail at issues of landscape sensitivity and character to assist in creating a ranking hierarchy for the sites within the final boundaries that evolved. In the case of the NDF, the two stages have effectively been conflated in policy terms in that the final versions of the Pre-Assessed Areas were determined during the two stages of assessment prior to their being included in the version of the NDF placed before the Senedd in September 2020. PPWales makes it clear (see below) there is no further process to be involved in which the Councils can secure further changes to the PAAs, perhaps through their own development plan work in the coming months and years.
- 3.4 A further point that is of special significance in the case of Upper Ogmre relates to the consideration that has been undertaken in the ARUP work of landscape character and quality across each of the PAAs that have emerged. There are numerous Special Landscape Areas designated in current Local Development Plans within the PAAs across Wales, and the documentation for the ARUP Studies notes the account that has been taken of local designations (as well as national ones) and Landscape Character Assessments in reaching the conclusions we now have in the NDF. That is important when one looks at the plans showing the Special landscape Areas within the landscape and visual assessment area for Upper Ogmre (see Figure 5.7 in the ES) against the similar assessment area for existing, consented and proposed wind farms in the same assessment area (Figure 5.9 in the ES). Just within this limited area of South Wales, it can be noted that:

All bar the three Bridgend turbines at Llynfi Afan are in an SLA in Neath Port Talbot

All of the 11 turbines that are now consented at Foel Trawsnant are in an SLA in Neath Port Talbot

The four turbines at Mynydd Brombil allowed on appeal are in an SLA in Neath Port Talbot

The five Melin Court turbines are in an SLA in Neath Port Talbot

Eight of the Pen y Cymoedd turbines are in an SLA in Rhondda Cynon Taf

The Taff Ely and Headwind Taff Ely wind farms are both in an SLA in Rhondda Cynon Taf

The Mynydd Portref and Mynydd Portref extension wind farms are both in an SLA in Rhondda Cynon Taf

Pant Y Wal is in an SLA in Bridgend

The western part of Fforch Nest is in an SLA in Bridgend

Of all these schemes, only Llynfi Afan inside Neath Port Talbot and Mynydd Brombil also in Neath Port Talbot derived from appeal decisions, with the rest being consented by the local Councils (apart from Pen y Cymoedd which was a Section 36 application). There is therefore already a significant element of the current sites of wind farm development within this study area which have been consented in SLAs. Notably in the case of the two appeals mentioned above, these were allowed before the LDP for Neath Port Talbot had been adopted - hence the adoption took place with the SLA in place in the knowledge of the consented wind farms in those SLAs.

4. [PPWales 2021](#)

- 4.1 The latest version of PPWales (PPW11) has been reworked to reflect the major change in approach contained in the NDF towards large-scale wind energy development. Whereas PPWales10 had endorsed the TAN8 provisions for Strategic Search Areas to which it was expected that large-scale (above 25MW) wind energy developments would be directed, all the material dealing with the contents of TAN8 has been removed. For ease of reference, the following paragraphs therefore replace Section 6 in the Planning Statement accompanying the application.
- 4.2 PPWales11 inserts new advice in Section Three on Climate Change and Decarbonisation, setting out the declaration in 2019 of the Climate Change emergency by the Welsh Government, alongside their interim targets from the Environment (Wales) Act of 2016 for each ten year period to 2050. It notes that while the UK Climate Change Committee had, in 2019, published its targets for the whole of the UK to reach net zero on greenhouse gas emissions by 2050 it had only recommended that Wales should achieve 95% by that date. While the Welsh Government had accepted this at the time, it now seeks to go beyond 95% to reach net zero itself.
- 4.3 PPW11 states that the planning system has a key role in delivering clean growth and the decarbonisation of energy, as well as in building resilience to the impacts of climate change. It goes on to state that the planning system should secure an appropriate mix of energy provision, which maximises benefits to the economy and communities whilst minimising potential environmental and social impacts. It sees the benefits of renewable and low carbon energy as of paramount importance, aiming to avoid the continued extraction of fossil fuels which will hinder progress towards achieving overall commitments to tackling climate change. In para 5.7.7 it sets out eight bullet points for the planning system to achieve as follows:
- 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.

4.4 It can be noted that several of these bullet points are of particular relevance to the current application, and notably for the first time there is detailed reference to energy storage as part of the overall package of energy provision. This is important since such references have been lacking in the past not only at national level but also in the development plans, as this is a newly emerged technology which is gaining importance as the need to balance the grid increases. Para 5.7.12 states that:

“Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can help balance supply and demand. Proposals for energy storage should be supported wherever possible.”

Later at 5.9.7, the text advises that the local balance of the energy network is a crucial consideration and planning authorities should consider the best places for local renewable energy generation to help improve the resilience of the grid in the future. That advice is of particular relevance to the issues that have occurred across Wales in recent years where proposals have been consented but not implemented in areas where grid reinforcement has not been achieved.

4.5 PPWales11 sets out the targets outlined by the Minister in 2016 of 70% of Wales’ electricity consumption to come from renewable energy by 2030, along with advice on local ownership of schemes. It requires (5.9.1) local authorities to facilitate all forms of renewable and low carbon energy development and should seek cross-department co-operation to achieve this. In doing so, planning authorities should

seek to ensure their area's full potential for renewable and low-carbon energy generation is maximised and renewable energy targets are achieved

- 4.6 Para 5.9.2 introduces the new concept of Local Area Action Planning (LAAP) as a whole energy system to identify how decarbonisation can work in each area or region, and using these LAAP and other development plan evidence to identify challenging, but achievable, targets for renewable energy in planning documents. Targets must not be seen as maximum limits, but used as a tool to maximise the available resources. Para 5.9.14 sets out the need for planning authorities to support and guide renewable and low carbon energy, developing spatial policies to “identify the most appropriate locations for the development of energy developments below 10MW. There should be a presumption in favour of development in identified areas, including an acceptance of landscape change...” The highlighted text is an addition to the former 5.9.8 of PPW10, which had been reflecting the old TAN8 approach, and in this latest version this section is dealing only with developments up to 10MW. Outside identified areas, applications should be determined on the merits of each proposal.

- 4.7 PPW11 then goes on, in the light of the abundance of the wind resource and its key role in meeting Welsh Government's vision for future renewable energy production, to set out policies for schemes of more than 10MW which are classed as being Developments of National Significance. At 5.9.17 it states in the context of the NDF:

“For large-scale wind developments, it 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.”

- 4.8 Crucially, para 5.9.18 then goes on:

“Local planning authorities should not seek to amend the Pre-Assessed Areas within their boundaries as they form part of the development plan...” i.e. they are now

contained in the NDF which is itself the upper tier for statutory purposes of the development plan for the decision-making policy process. This “instruction” about not amending the new Pre-Assessed Areas is directly opposite to the position which has been in place since TAN8 was published in 2005. That document defined in broad-brush style the boundaries of each of the seven Strategic Search Areas, with the statement that the local planning authorities may wish to make minor adjustments to those boundaries when they were translated into their local planning documents, to facilitate the inclusion of development on the margins of the SSAs where local conditions recommend. All of the SSAs did become the subject of such “adjustments” but these resulted in most cases in significant reductions in their overall extent and in the definition of a ranking order for sites identified within them. No such process is envisaged under the NDF and PPW11. For the avoidance of doubt, it can be stated that in the case of Upper Ogmore, the site area for the wind farm is almost entirely outside the original TAN8 boundary for SSA F, but wholly outside the refined boundary created by ARUP in their refinement exercise for Area F undertaken on behalf of the group of local Councils. However, it is entirely within the Pre-Assessed Area for the NDF for this part of South Wales (PAA9).

4.9 Then, the new PPW sets out factors to be taken into account in determining applications. Three main issues are identified as:

- 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.

4.10 Guidance is then given at para 5.9.20 on measures for avoidance, mitigation or compensation in respect of adverse impacts of renewable and low carbon energy developments, most of which, apart from the matter of grid connection issues, are contained within Policy 18 of the NDF.

4.11 Finally in the context of the section on renewable energy there is detailed advice at para 5.9.24 on local involvement and community benefit, reflecting the latest

(2020) Welsh Government advice that it expects all new renewable energy projects in Wales to have at least an element of local ownership.

- 4.12 Section 6 of the new PPW addresses a range of issues which cover distinctive and natural places. These are already identified as a range of factors to be considered in the decision-making process for energy proposals outlined above, and it is important to recognise that it is under that guidance that the balancing exercise between benefits and potential harm has to be carried out. Part 6.1 identifies relevant matters for the historic environment, and is supported by more detailed guidance in the new TAN24: The Historic Environment, published in May 2017. Landscapes are dealt with under 6.3 with specific references to Special Landscape Areas and their designation in 6.3.12-13. Common land issues are addressed under 6.3.18-19 and biodiversity in Section 6.4.

5. [Revocation of TAN8](#)

- 5.1 The formal revocation of TAN8 means that the whole of Section 7 of the original Planning Statement now becomes of no direct relevance to the determination of the planning application. Indeed, as noted above, the effect of introducing the NDF and revoking TAN8 is to reverse the strategic planning position as regards the presumption in favour of development. However, the original Planning Statement did address the whole issue of the Llynfi Afan appeal and the Inspector may still find it useful to consider the text in 7.4 and 7.11-7.13 to be aware of how his colleague reached her conclusions on the then ARUP refinement exercise and the then TAN8 SSA boundary, since Llynfi Afan lay outside the refined area, and abuts the western side of the current proposal at Upper Ogmore. The assessments which underpinned the refined areas within SSA F were the subject of detailed criticism by the Inspector in her decision letter and in a sense her decision to permit Llynfi Afan which supported the landscape and visual and the planning policy evidence in respect of the TAN 8 boundaries can be seen as a precursor for the entirely new policy position that we have under the NDF. Quite apart from the issue of land in this area being consented for wind farm developments within proposed or designated SLAs under the old TAN8 advice, both inside and outside the refined area for SSA F, the fact remains that Bridgend consented the three southern turbines of Llynfi Afan at the local level even though these were further away from the refined SSA boundary than the remainder of the scheme inside Neath Port Talbot.

6. [Weight to be given to the extant LDPs in Bridgend and Neath Port Talbot](#)

- 6.1 The original Planning Statement set out at 9.2 that the material underpinning the relevant renewable energy policy ENV18 related to the TAN8 refined Strategic Search Area, and that the 2010 capacity for Area F had in fact been met, but not the higher 2017 levels set by Welsh Government. At that stage, it was noted that the advice in the then new PPWales 10 had indicated that all the issues relating to refining the SSA boundaries would have to be revisited in the light of the passage of time and new target figures being set. At 9.5.4, it was noted that criterion 1 of ENV18 set out a preference for developments over 25MW (the then “large-scale”

category in TAN8) to be sited in the refined SSAs. While I then went on to explain why that policy approach had already been undermined by events with the allowing of the Llynfi Afan appeal on adjacent land with the same spatial relationship to the edge of the refined SSA boundary, the publication of the new NDF and PPW11 has completely changed the planning policy position in this part of Bridgend. There is no longer a refined SSA boundary to which developments of national significance should be directed - indeed, the new Pre-Assessed Area in the NDF for this area is entirely different to the old SSA. Now both Llynfi Afan and Upper Ogmore lie entirely inside the new PAA and as part of the statutory development plan this provision supersedes the Bridgend LDP as regards the strategic siting of wind farms within the County Borough. While due regard still has to be had to the criteria in Policy 18 of the NDF and ENV18 of the LDP, there is a presumption under Policy 17 of the NDF that the landscape effects of Upper Ogmore have been deemed to be acceptable (cumulative issues remain to be assessed separately).

To assist the Inspector in preparing the assessment of the proposal, there is attached to this addendum statement a plan (Figure 5.30) showing how the proposal relates to the new PAA. The old TAN8 boundaries are not included within this plan for the simple reason that they have become redundant with the revocation of TAN8.

6.2 Again as a consequence of the revocation of TAN8, and the new advice in the NDF and PPW11, the submissions set out in the original Planning Statement at 9.5.6-9.5.8 have been overtaken by events to a very large extent, since there is under the NDF and PPW11 a presumption in favour of this wind farm inside the new PAA9 in the NDF in the context of its landscape effects. Similar caveats need to be applied to the Supplementary Guidance in Bridgend referred to under 9.6-9.11 of the original Planning Statement, given the change in the strategic locational guidance which has now been issued.

6.3 Insofar as the Neath Port Talbot LDP is concerned, it has been noted that the Council has raised issues in its impact statement, to which a separate response will be made, but the same position arises in respect of the revocation of TAN8 and the publication of the new PAAs under the NDF. Issues relating to general landscape issues from turbines inside Bridgend which may impact on Neath Port Talbot have to be viewed in the context of the presumption in favour of a wind farm on the Upper Ogmore site

in terms of the general matter of landscape impacts. The comments in para 10.1 of the Planning Statement on the other LDP policies are not affected.

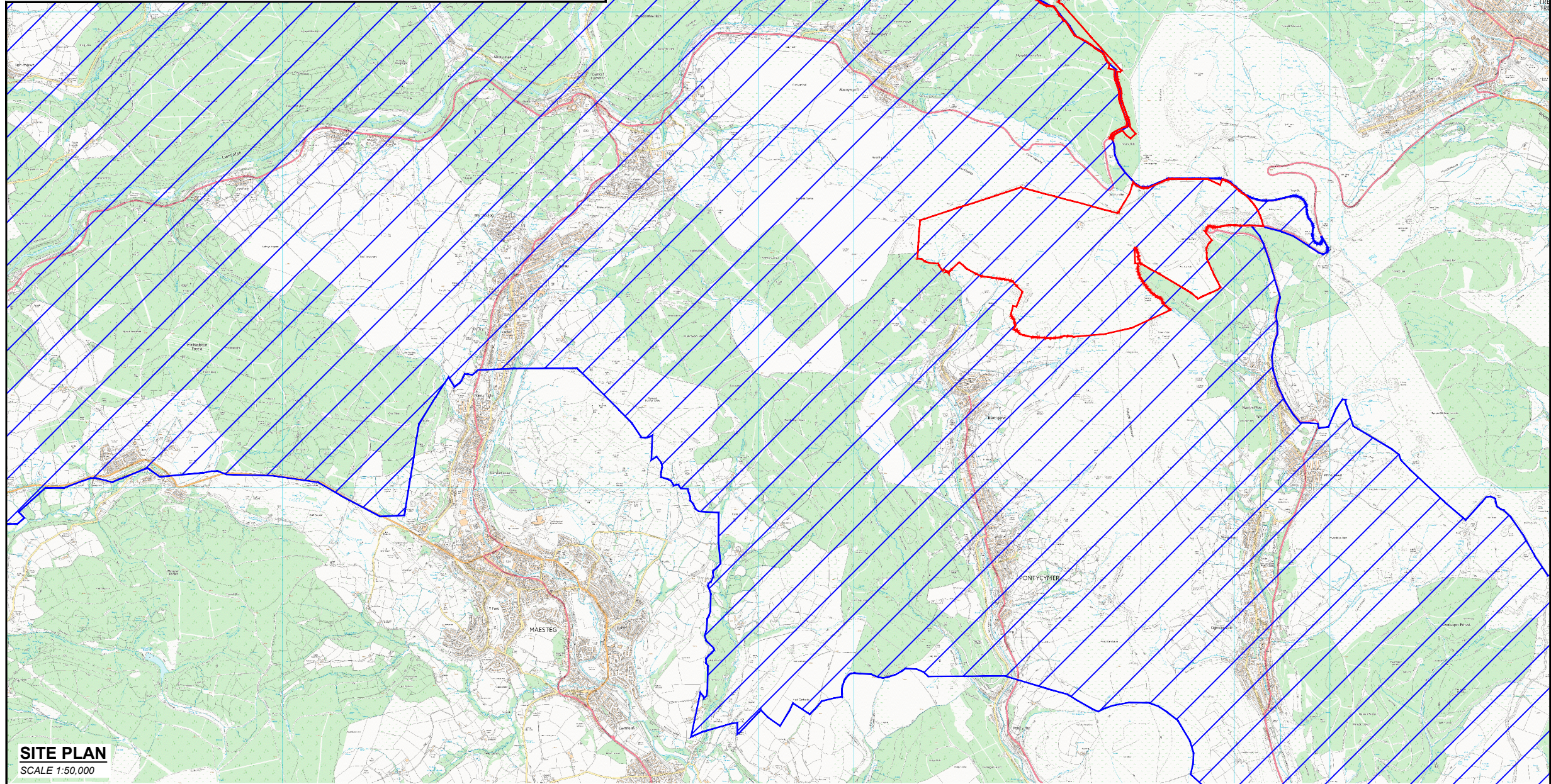
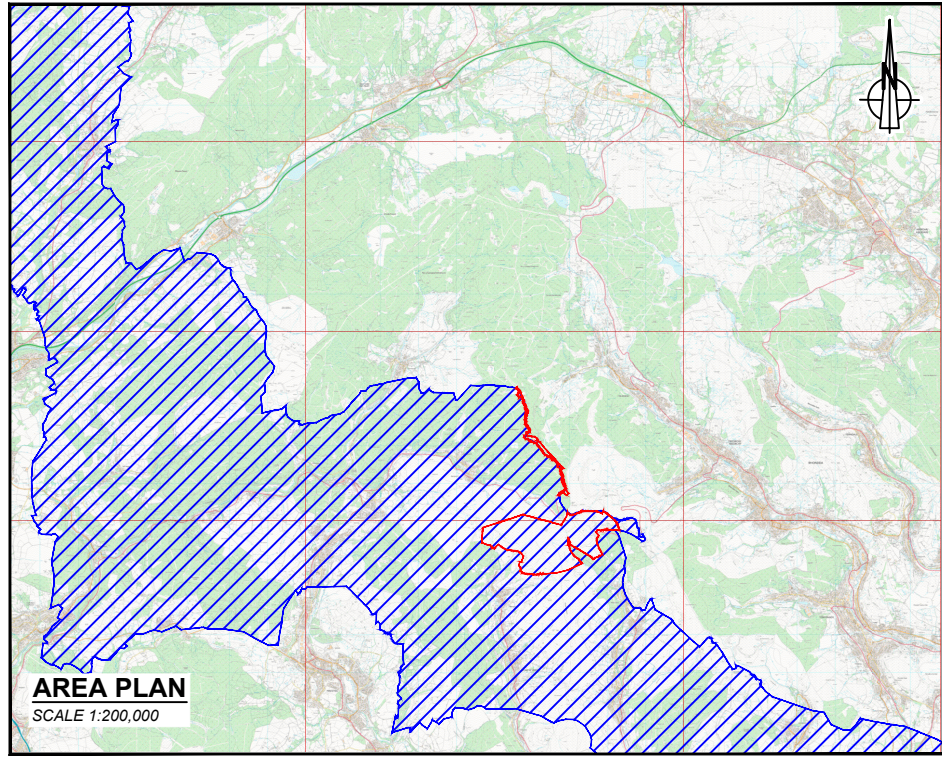
7. Conclusions

- 7.1 Following the publication of the NDF and PPW11, it is clear that the Welsh Government is making a strategic change of direction in the context of the identification and use of defined areas in which there will be a presumption in favour of large-scale onshore wind in Wales. The adoption of Pre-Assessed Areas across Wales within which that presumption will apply has been the subject of detailed expert assessment, and, not only that, but there has been a very detailed debate within the consultation exercise about the merits of such an approach. Notwithstanding the objections that have arisen from many opposed to the continuation of onshore wind as a main element of the drive for renewables in Wales, the Welsh Government remains committed to this approach and it forms the basis of their new policy statement. It marks a sea change for the handling of proposals for wind farms of this scale in that many more areas, where there had hitherto been a general assumption that large-scale developments would be resisted, will now come into play. The Upper Ogmere scheme is one where it has already been submitted that a strong case could be made on grounds of its intrinsic merits for a consent, exemplified by the pattern of consents within and around Area F to date. The whole basis of assessment of the Area F sites and its boundaries has been the subject of much criticism and it can now be seen that a new approach to the boundaries of acceptable areas across Bridgend and Neath Port Talbot as well as neighbouring authorities is likely to prevail.

Documents

1. WG - National Development Framework - Future Wales 2040
2. PPWales11 2021
3. WG - Draft National Development Framework 2020
4. WG - 2019 Consultation draft of the National Development Framework.
5. WG - Consultation Report on 2019 draft NDF.
6. ARUP Assessments of onshore wind and solar potential in Wales 2019

7. WAG - TAN8 2005
8. Appeal decision in respect of Llynfi Afan Wind Farm
(APP/Y6930/A/12/2181883 - 27 August 2013)



**UPPER OGMORE
WIND FARM**

FIGURE 5.30

**PLANNING APPLICATION BOUNDARY
& NDF PRE-ASSESSED AREAS
FOR WIND ENERGY**

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KEY:

- PLANNING APPLICATION BOUNDARY
- NDF PRE-ASSESSED AREAS FOR WIND ENERGY

LAYOUT DWG	N/A	T-LAYOUT NO.	N/A
DRAWING NUMBER			
02959-RES-LAY-DR-PT-001			
SCALE - 1:50,000			
PLANNING STATEMENT			
2020			
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