

PLANNING STATEMENT

Land at Baglan Energy Park, Chosen Industrial Park, Briton Ferry, Neath SA11 2HZ



Date: January 2025

Prepared for: Aldustria Ltd

Prepared by: Claire Alers-Hankey

Development Land and Planning Department
Greenslade Taylor Hunt
Winchester House
Deane Gate Avenue
Taunton
Somerset
TA1 2UH

T: (01823) 334466

E: Claire.alershankey@gth.net

Reference: CAH/2993D

Contents

1.0	Introduction	1
2.0	The Application Site	2
3.0	Proposed Development.....	2
4.0	Planning History & Pre-application Consultation	4
5.0	Planning Policy Context.....	4
6.0	Planning Assessment	22
7.0	Conclusion	26

Revision history:

File reference: CAH/2993E	Prepared By	Date	Checked By	Date
	Emily Garland	30/01/2025	Claire Alers-Hankey	30/01/2025

This Statement has been prepared by Greenslade Taylor Hunt for the sole use of Aldustria Ltd in accordance with the Agreement under which the services were undertaken. This Statement cannot be distributed or reproduced in whole or in part and may not be relied upon by any other party without the prior and express written agreement of Greenslade Taylor Hunt. No other warranty, expressed or implied, is made with regards to the professional advice in this Statement.

1.0 Introduction

1.1 Scope of the Report

- 1.1.1 This Planning Statement has been prepared by Greenslade Taylor Hunt on behalf of Aldustria Limited. It supports the submission of a full planning application to Neath Port Talbot Council for the siting of a 30MW battery energy (BESS) storage system and associated works at Land at Baglan Energy Park, Chosen Industrial Park, Briton Ferry, Neath SA11 2HZ
- 1.1.2 The proposed development is designed to reinforce the National Grid by providing instantaneous energy balancing services. This is achieved by storing energy produced when demand is low or there is an over-supply, which can be distributed when demand increases. These systems mitigate the intermittent nature of renewable energy generation sources.
- 1.1.3 The application is accompanied by the following documents:
- Preliminary Ecological Appraisal;
 - Noise Assessment;
 - Flood Consequence Assessment;
 - Planning drawings.
- 1.1.4 These documents form part of the content of the planning application for the proposed development together with the statutory application form and the submitted plans.
- 1.1.5 Due to the modest size of the proposed development, the lack of sensitive receptors in close proximity to the site and the non-polluting nature of the scheme, it is considered that the proposed development does not comprise Environmental Impact Assessment development.
- 1.1.6 This statement provides an appraisal of the site and its broader context, followed by a description of the proposed development with reference to access and design. It then goes on to assess the proposals against relevant local and national planning policies. The planning case is then made and conclusions provided, demonstrating the conformity of the proposals with the development plan policies and that the proposals constitute a sustainable form of development.

2.0 The Application Site

2.1 The Site

2.1.1 The site is located on Baglan Energy Park at Neath. The location and extent of the site is identified on the accompanying plans prepared by LHC. The M4 motorway is adjacent to the site on the northeast and is elevated above the local ground levels. Brunel Way is to the northwest passing alongside the Outer Basin and Armstrong's Hydraulic Accumulator. The site is adjacent to existing commercial warehouses and storage areas.

2.1.2 The application site totals approximately 0.44 hectares (circa one acre) and forms part of the current curtilage to Unit 3, located directly to the southwest.

2.1.3 The wider Unit 3 site is accessed off Brunel Way to the southeast of the site.

2.2 Site Context

2.2.1 The land is not subject to any statutory landscape or environmental designations, and there are no heritage designations or historic assets within or in close proximity to the site. The site is identified on the abandoned mines catalogue.

2.2.2 The site is wholly within Flood Zone 1, land at the lowest risk of coastal or fluvial related flooding and there are no mapped occurrences of surface water flooding arising within or in close proximity to the site. The site is within a commercial/industrial complex.

2.2.3 There are no Public Rights of Way (PROW) through the site.

3.0 Proposed Development

3.1 Development Rationale

3.1.1 The proposal seeks full planning permission for the construction of a grid-connected BESS. In the UK, the National Grid is struggling to cope with fluctuating peaks in power demand. Energy storage utilises flexible technology to absorb surplus electricity at times of excess generation and releasing it when needed. The technology has the ability to import or export energy for seconds, minutes or hours. The system is responsive to the demand for energy and can switch from charge to discharge within seconds.

3.1.2 Energy storage facilitates the balancing of volatility in supply and demand of energy. It performs a valuable role in the continued adoption of renewable energy projects that contribute towards the UK's initiative to combat climate change and the targets for achieving carbon net zero status.

3.1.3 The connection to the grid will be made at the National Grid Substation, located approximately 215 meters south of the BESS compound. The cable would run below ground from the boundary of the site directly to National Grid owned land at the substation.

3.2 Development Composition

3.2.1 The proposed development is the siting of a 30MW BESS, formation of access and associated works. The BESS is sought for a temporary period of 25 years, after which time, it is anticipated the facility would be decommissioned and replaced with more efficient technology. The proposals comprise the installation of the following:

- 13 x battery racks;
- 13 x MV Skid (transformer) racks;
- 1 x HV Switchroom GRP Enclosure;
- 1 x LV Switchroom GRP Enclosure;
- Grid connection substation equipment;
- 1 x Transformer;
- 1 x Control Room; and
- 2.4m high galvanised steel palisade fence to surround battery site;

3.2.2 The submitted plans provide full details relating to the scale of the infrastructure proposed. The battery racks and MV transformers will be within shipping container units and finished in white marine grade paint, the control room will be faced with marble grey concrete facing brick (or similar) and roofed with concrete roof tile in dark grey (or similar). The switchroom enclosures will be finished in green coloured steel. The proposed fencing is 2.4 metres high galvanised steel palisade railings. Site access and on-site parking will be on a gravel surface.

3.2.3 The applicant has sought a viable connection to the National Grid, and hence the feasibility of the site to serve as a BESS is secure. The grid connection for the proposed development would be installed below ground and would be undertaken by the statutory undertaker, under permitted development rights.

4.0 Planning History & Pre-application Consultation

4.1 Planning History

- 4.1.1 There are two previous applications for the adjacent site, which relate to the planning permission for the adjacent building. The reference numbers for these applications are as follows: P2006/0159 and P2004/0719.

4.2 Pre-application Consultation

- 4.2.1 There have been no pre-application enquiries made regarding these proposals.

5.0 Planning Policy Context

5.1 Introduction

- 5.1.1 In relation to the proposed development, a range of planning policy documents and guidance must be considered as key material planning considerations.

5.2 Planning Policy Wales – Edition 12

- 5.2.1 Planning Policy Wales (PPW) Edition 12 (February 2024) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together provide the national planning policy framework for Wales.

- 5.2.2 The primary objective of the PPW is to *“ensure the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well functioning planning system is fundamental for sustainable development and achieving sustainable places”*.

- 5.2.3 Within the PPW there is reference to the seven goals of the well-being and future generations act. For this application the most relevant being *“Above all, a Globally Responsible Wales is promoted by reducing our carbon footprint through integrated public transportation infrastructure, encouraging globally responsible business and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised”*.

- 5.2.4 Paragraph 3.7 under the heading of ‘Environmental Sustainability’ sets out that development *“should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise the sustainable movement, minimise the use of non-renewable sources, encourage decarbonisation and prevent the generation of waste and pollution”*.
- 5.2.5 Section 5 of the PPW ‘Productive and Enterprising Places’ covers the economic components of placemaking. Productive and Enterprising Places are those which promote economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. One of the key issues identified under the heading ‘Productive and Enterprising Trends and Issues’ is *“embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, decentralised renewable energy systems, the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks”*.
- 5.2.6 Paragraph 5.4.13 of the PPW states that planning authorities should aim to promote the re-use of previously developed, vacant and underused land.
- 5.2.7 Section 5.7 of the PPW specifically covers the topic of energy. Paragraph 5.7.1 says that the Welsh Government’s highest priority is that wherever it is possible and affordable they want to reduce demand. The main source of energy in Wales must be low carbon electricity and the future energy supply mix will depend on a range of established and emerging low carbon technologies.
- 5.2.8 Paragraph 5.7.2 continues on to say that significant investment in energy generation, transmission and distribution infrastructure will be needed if future demand is to be met. In order to minimise the need for new generation and grid system reinforcement, the system will need to integrate renewable generation with storage and other flexibility services. It goes on to say, *“Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales”*.
- 5.2.9 Paragraph 5.7.7 sets out various ways the planning system should bring forward the energy transition some of which include the following:
- Optimise energy storage;
 - Optimise the location of new developments to allow for efficient use of resources;

- Maximise renewable and low carbon energy generation; and
- Move away from the extraction of energy minerals, the burning of which is carbon intensive.

- 5.2.10 Under the title Electricity Grid Network and Energy Storage are the following: Paragraph 5.7.8 states the following *“An effective electricity grid network is required to fulfil the Welsh Government’s renewable and low carbon ambitions. An integrated approach should be adopted 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”*.
- 5.2.11 Paragraph 5.7.10 talks about how planning authorities should plan positively for grid infrastructure. It states that *“Planning authorities should support appropriate grid developments, whether or not the developments to be connected are located within their authority”*.
- 5.2.12 Paragraph 5.7.11 states that *“Planning authorities and the energy industry, including National Grid and Distribution System Operators, should engage with each other to ensure development plans take grid infrastructure issues into account. This can also ensure investment plans for transmission and distribution align with the identified potential for renewable and low carbon energy as well as the future challenges of increasing electrification of transport and heat”*.
- 5.2.13 Paragraph 5.7.12 specifically relates to energy storage and states the following *“Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can help balance supply and demand. Proposals for new storage facilities should be supported wherever possible”*.
- 5.2.14 Paragraph 5.8.1 confirms that the planning system should support new development that *“supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaption measures”*.
- 5.2.15 Paragraph 5.9.1 sets out PPW support for renewable energy and states the following *“Local authorities should 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”.

5.2.16 Paragraph 5.9.20 comes under the heading ‘Development Management and Renewable and Low Carbon Energy’. This paragraph sets out how planning authorities should identify and require suitable ways to avoid, mitigate or compensate adverse impacts of development. It goes on to say that development proposals should take the following 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 the effects on the transportation network;
- Grid connection issues where renewable (electricity) energy developments are proposed; and
- The impacts of the 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.

5.3 Technical Advice Notes

5.3.1 The TANs provide detailed planning advice which local planning authorities must take into account when preparing development plans and making decisions on planning applications.

TAN 11: Noise

5.3.2 This note provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main considerations that local planning authorities should take into consideration when drawing-up development plan policies and when determining planning applications for development which will generate noise or be exposed to existing noise sources.

5.3.3 Local planning authorities must make sure that any development generating noise does not cause an unacceptable degree of disturbance.

TAN 15: Development and Flood Risk.

- 5.3.4 This provides technical guidance to supplement the policy set out within Planning Policy Wales in relation to development and flooding. This guidance relates to sustainability principles and provides a framework to allow risks arising from river flooding, coastal flooding and additional run off from developments to be assessed.
- 5.3.5 Local planning authorities have a duty to ensure that development is suitable and will not create issues for future generations. Managing flooding has a significant role to ensure sustainable development by guiding developments to locations with little or no risk from river, tidal or coastal flooding, managing consequences of flooding where developments can be justified and making provision for climate change.

TAN18: Transport

- 5.3.6 TAN18 describes that the planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development, in particular climate change and the outcomes identified in the Assembly Government's Environment Strategy. Managing parking provision and ensuring that transport infrastructure or service improvements necessary to serve new development and allow existing transport networks to continue to perform their identified functions can all help the Assembly Government achieve these environmental outcomes together with its wider sustainable development policy objectives.

TAN23: Economic Development

- 5.3.7 This note deals with B-classes of development (The traditional land use B1-B8 classes of development.) However, more generally, it states that *"Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development"*.

TAN24: The Historic Environment

- 5.3.8 TAN24 describes how the planning system should consider the historic environment when making decisions for planning and listed building applications. This note confirms it is up to the local planning authority to consider the effects of proposed developments within the settings of listed buildings,

conservation areas, unscheduled monuments of national importance and other undesignated historical assets.

5.4 Neath Port Talbot County Borough Council Local Development Plan 2011 – 2026 (Adopted January 2016)

5.4.1 The local Development Plan states in its overarching objectives that the Council wants to “*Minimise the causes and consequences of climate change through reduces greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development*” (Objective1). It goes on to say that when valuing the environment the Council wants “*to make a proportionate contribution towards the energy needs of Wales with a focus on renewable energy*” (Objective 19). The following policies from the Neath Port Talbot Development Plan are considered to be of relevance to the proposals.

5.4.2 Policy SP1 – Climate Change. This policy sets out the causes and consequences of climate change and how they will be addressed by implementing certain measures. In relation to the causes of climate change:

1. The efficiency and sustainability of the County Borough’s settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns;
2. Greenhouse gas emissions from transport will be minimised through encouraging freight / commercial transport by alternatives to road (e.g. rail or sea);
3. Dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities;
4. Provision will be made for the County Borough’s appropriate contribution to renewable and low carbon energy generation.

In relation to the consequences of climate change:

1. Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first

instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere;

2. The fragmentation of habitats will be minimised and opportunities made for habitat and species change and migration where possible.

5.4.3 Policy SP16 – Environmental Protection. States that Air, water and ground quality and the environment generally will be protected where feasible through the following measures:

1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;
2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.

5.4.4 Policy SP18 – Renewable and Low Carbon Energy. This policy states that a proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. This will be achieved by:

1. Encouraging where appropriate, all forms of renewable energy and low carbon technology development;
2. Encouraging energy conservation and efficiency measures in all new major development proposals;
3. Ensuring that development will not have an unacceptable impact on the environment and amenity of local residents.

5.4.5 Policy EC3 – Employment Area Uses. Sets out the uses appropriate within allocated or existing employment areas. Uses are restricted to the following:

- Uses within Class B1, B2 and B8.
- Ancillary facilities or services which support and complement the wider role and function of the

primary employment use;

- Commercial services unrelated to class B. Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area.

5.4.6 Policy EN8 – Pollution and Land Stability. Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted: Air pollution, noise pollution, light pollution, contamination, land instability, water (including groundwater) pollution. Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.

5.4.7 Policy RE1 – Criteria for the Assessment of Renewable and Low Carbon Energy Development. This policy sets out the criteria for acceptable for renewable and low carbon energy development. The following criteria apply:

1. Large scale wind farm developments (>25MW) will be expected to be located within the boundaries of the refined Strategic Search Areas.
2. Proposals for wind farms of any size outside the SSAs will only be permitted where it is demonstrated that there will be no unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure.
3. Small scale wind farm developments (<5MW) will be required to demonstrate that impacts are confined to the local scale.
4. All renewable energy or low carbon energy development proposals will be required to demonstrate that:
 - (a) Measures have been taken to minimise impacts on visual amenity and the natural

environment;

(b) There will be no unacceptable impacts on residential amenity;

(c) The development will not compromise highway safety;

(d) The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and

(e) There are satisfactory proposals in place for site restoration as appropriate.

5.4.8 Policy TR2 – Design and Access of New Development. Policy TR2 sets out the criteria that must be satisfied for development proposals:

1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.

5.5 Future Wales: The National Plan 2040

5.5.1 Future Wales is the national development framework which sets the direction for development in Wales up to 2040. It sets out a *“strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities”*.

5.5.2

5.5.3 Future Wales is the national development framework and the highest tier of development plan. It is focused on solutions to issues and challenges at a national scale. It does not allocate land for development or include policies on land uses but is a framework on which Local Development Plans can be built upon.

5.5.4 Future Wales states the following under the heading 'Climate Change':

"The climate is already changing ... trends show the UK climate is continuing to warm and sea levels continue to rise. In terms of the future ... the projections show an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and intensity of extreme weather events.

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 caused by climate change are putting pressure on ecosystems, infrastructure, built environment and our unique landscape and cultural heritage, which all contribute to social, economic and ecological resilience.

Climate change is an equality issue as it will disproportionately affect the most vulnerable communities in Wales and the wider world ... 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.

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

5.5.5 When Future Wales talks about Low Carbon Economy and Renewable Energy it states *"we must focus on delivering clean growth aim and preparing the Welsh economy for the markets of the future and demand for low carbon goods and services"* and *"Wales can become a world leader in renewable energy technologies ... our commitment to ensuring the planning system provides a strong lead for renewable energy development, means we are well placed to support the renewable sector, attract new investment and reduce carbon emissions"*.

5.5.6 It also goes on to state the need for BESS developments stating *"The UK's energy system is now undergoing significant change, with energy generation and delivery becoming more distributed in the*

communities and regions where the energy is used. The boundaries between systems are also becoming blurred, with energy being converted into (and stored in) different forms to address a range of needs. There is also a need to consider large-scale energy storage as part of the energy system to provide grid balancing.”

5.5.7 Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure. States the following: *“The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales’ international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency”.*

5.5.8 Future Wales sets out that *“Decarbonisation and responding to the threats of the climate emergency should be central to all regional planning”* when talking about Strategic Development Plans.

5.6 Well-being of Future Generations (Wales) Act 2015

5.6.1 The Well-being of Future Generations (Wales) Act 2015 gives a legally-binding common purpose (the seven well-being goals) for national government, local government, local health boards and other specified public bodies. It details the ways in which these bodies must work, and work together, to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

5.6.2 Paragraph 5(1) of The Well-being of Future Generations (Wales) Act 2015 sets out that public bodies *“must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”.*

5.7 Welsh Government’s Net Zero Strategic Plan – September 2022

5.7.1 This Strategic Plan sets out 54 initiatives that provide the foundation for the Welsh Government to progress towards net zero. The initiatives cover the entire Welsh Government organisation, from the operation of buildings, travel, procurement of goods and services, and future ways of working.

5.7.2 The report states *“the scale of change needed is transformative – energy and resource efficiency upgrades, renewable heat & power, switching to more sustainable materials and moving to a zero emissions fleet will all need to be effectively deployed. Alongside this, we need efficient operations, low*

carbon procurement practice, and support for our staff at home and commuting to progressively decarbonise. Building on our existing work, we must now put these strategic initiatives into action”.

- 5.7.3 Paragraph 5.4.3 states *“Converting our heating systems from fossil fuels such as oil and gas to electric heat pumps will not only save energy overall, but will increase our electricity consumption significantly, requiring large solar PV and battery storage systems to maximise carbon reductions”*

5.8 Energy White Paper (2020)

- 5.8.1 The Energy White Paper – Powering our Net Zero Future was published in December 2020 and sets out a Ten Point Plan to address the challenge of climate change and achieve a target of net zero emissions.

- 5.8.2 A major focus of the document is a move towards greener energy, with clean electricity generation given a pivotal role in delivering net zero emissions. Chapter 3 of the document states, *“A low-cost, net zero consistent system is likely to be composed predominantly of wind and solar. But ensuring the system is also reliable, means intermittent renewables need to be complemented by technologies which provide power, or reduce demand, when the wind is not blowing, or the sun does not shine. Today this includes nuclear, gas with carbon capture and storage and flexibility provided by batteries, demand side response, interconnectors and short-term dispatchable generation providing peaking capacity, which can be flexed as required.”*

- 5.8.3 Chapter 4 of the document recognises the need for flexibility within supply and demand of electricity will come from new, cleaner sources, such as energy storage in batteries. The document also commits through the Net Zero Innovation Portfolio, investment in longer term energy storage.

5.9 National Policy Statement for Energy (2011)

- 5.9.1 In July 2011, the Department of Energy and Climate Change (DECC) published an overarching National Policy Statement (NPS) for Energy EN-1. NPS EN-1 sets out national policy for energy infrastructure and states that: *“[it] is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended).”* (paragraph 1.2.1).
- 5.9.2 In terms of energy security, NPS EN-1 states that: *“It is critical that the UK continues to have secure and reliable supplies of energy as we make the transition to a low carbon economy...”* (paragraph 2.2.20). In addition, the NPS recognises that a flexible approach to energy generation is required in

order to provide backup supply for renewable energy sources, by stating: *“the more renewable generating capacity we have the more generation capacity we will require overall, to provide back-up at times when the availability of intermittent renewable sources is low.”* (paragraph 3.3.11).

5.9.3 The NPS identifies that the overall capacity of the grid will require additional resources to meet future demands. This is reinforced by paragraph 3.3.12, which states: *“...we need more total electricity capacity than we have now, with a larger proportion being built only or mainly to perform back-up functions.”*

5.9.4 It is clear from a review of NPS EN-1 that the Government expect new balancing services to come forward through the planning system to ensure energy security and to support low carbon electricity generation. As such the proposed development is considered consistent with the aims of NPS EN-1.

5.10 Planning Our Electric Future: A White Paper for Secure, Affordable and Low Carbon Energy (2011)

5.10.1 In July 2011 DECC published the White Paper ‘Planning our Electrical Future: A White Paper for Secure, Affordable and Low-Carbon Electricity’ under its Electricity Market Reform agenda. The white paper set out the Government’s commitment to transforming the UK’s electricity system to ensure that future electricity supply is secure, low-carbon and affordable.

5.10.2 The reforms seek to ensure that, by 2030, the UK will have a flexible, smart and responsive electricity system, powered by a diverse and secure range of low-carbon sources of electricity. It recognises that, in order to ensure continued international competitiveness, a number of unprecedented challenges need to be addressed, namely:

- Security of supply is threatened as existing generating plants close, noting that over the current decade around a quarter (20GW) of existing generation capacity will be lost as old plants close;
- Decarbonising electricity generation to transform the UK permanently into a low carbon economy to meet renewable energy targets;
- Accommodating increased demand for electricity, noting that despite improvements in domestic and non-domestic energy efficiency, overall demand for electricity is likely to double by 2050; and

- Managing electricity costs, noting that whilst the UK is likely to experience short term fluctuations in power prices, it is likely that there will in the long-term be overall increases in wholesale costs arising from the carbon price, stricter environmental policies and major investment in new large-scale infrastructure.

5.10.3 The proposed development would help deliver the flexible energy network envisaged by the white paper.

5.11 Upgrading our Energy System: Smart Systems and Flexibility Plan (July 2017) and Progress Report (October 2018)

5.11.1 In July 2017, the Department for Business Energy and Industrial Strategy (BEIS) and Ofgem published a policy paper entitled: 'Upgrading our Energy System: Smart Systems and Flexibility Plan'. The Executive Summary identifies that the, *"...plan is an important part of the Government's Industrial Strategy, the forthcoming Clean Growth Plan, and a core component of Ofgem's future-facing work to enable the energy system transition."*

5.11.2 The plan set out 29 actions that seek to remove barriers to smart technologies (such as storage which includes batteries as illustrated within the case studies); enable smart homes and businesses; and improve access to energy markets for new technologies and business models. The actions are designed to support clean growth, reduce the cost of the energy system and keep energy bills low for consumers.

5.11.3 As set out in the conclusion to the plan, it seeks to enable the development of a smart, flexible energy system that will reduce costs for consumers and industry, and support the growth of innovative new businesses. The aim of which is to upgrade the regulatory and market framework, open up new opportunities for consumers / market participants, and provide conditions in which innovation can flourish. Finally, it recognises: *"As a core part of the Industrial Strategy, it is an opportunity to increase productivity at home, and put the UK in a leading position to export smart energy technologies and services to the rest of the world."*

5.11.4 A progress update was published in October 2018. This confirmed that at the date of publication, 15 actions had been implemented with the commitment to delivering the remaining 14 actions by 2022. It also set out nine new actions beyond those set out previously that have been committed to since the original publication. These include actions to ensure that the network connections process is

appropriate and does not present any undue burdens to storage.

- 5.11.5 The proposed development would help deliver the flexible energy network envisaged by this plan.

5.12 Clean Growth Strategy (October 2017)

- 5.12.1 The Clean Growth Strategy was published in October 2017. The strategy outlines the ambition of delivering a, *“diverse electricity system that supplies our homes and businesses with secure, affordable and clean power.”* It goes on to state that this: *“... means upgrading our electricity system so it is smarter (using data to provide greater control), more flexible (providing energy when it is needed) and takes advantage of rapidly developing technologies such as energy storage...”* (page 95)

- 5.12.2 Page 96 identifies that one possible clean growth pathway (to 2032), *“could see power emissions fall by 80 per cent compared to today, to around 16 Mt.”* It goes on to identify that, *“This could be achieved by:*

- *Growing low carbon sources such as renewables and nuclear to over 80 per cent of electricity generation, and phasing out unabated coal power.*
- *Enabling a smarter, more flexible system, unlocking significant expansion of interconnection, electricity storage, and demand side response, the first steps of which are set out in the Smart Systems and Flexibility Plan...”*

- 5.12.3 A range of policies and proposals are set out within the strategy; those of relevance to the Proposed Development include:

- *“The Government, Ofgem and industry will implement the 29 actions set out in the Smart Systems and Flexibility Plan published on 24 July. These technologies such as energy storage and demand side response to compete effectively within the energy market, help integrate more low carbon generation such as solar into our energy system, and deliver secure, smart appliances and smart tariffs to allow consumers to benefit from using energy at times when it is cheaper. Innovations and other steps to increase flexibility could unlock up to £40 billion in energy cost savings up to 2050.”*
- *“We will work with Ofgem to ensure the necessary regulatory and market arrangements evolve to support the development of a clean, smart and flexible energy system as outlined in their strategy for regulating the future energy system.”*

- *“The Government expects to invest around £900 million of public funds between 2015 and 2021 in research and innovation in the power sector.” For power and smart systems, this includes: “Ensuring that the power system is smart and resilient to new demands and new sources of supply will be important for energy security, cost and industrial opportunities. The Government, in partnership with the Research Councils and Innovate UK, expects to invest around £265 million in research, development and deployment in this area which will help to reduce the cost of electricity storage, advance innovative demand response technologies and develop new ways of balancing the grid...”*

5.12.4 The proposed development would help deliver the flexible energy network and move to a low carbon economy envisaged by the strategy.

5.13 Building a Britain Fit for the Future (November 2017)

5.13.1 The ‘Building a Britain Fit for the Future’ White Paper was published by the Department for BEIS in November 2017. It sets out the long-term plan to help businesses create better, higher paying jobs with investment in the skills, industries and infrastructure of the future.

5.13.2 The plan is supported by five foundations of productivity (ideas, people, infrastructure, business environment and places) which align with the Government’s vision for a transformed economy. It also defines four ‘grand challenges’, one of which is the aim of: *“maximising the advantages for UK industry from the global shift to clean growth.”* (page 10)

5.13.3 The Government identifies that: *“The move to cleaner economic growth – through low carbon technologies and the efficient use of resources – is one of the greatest industrial opportunities of our time...”* (page 42). The strategy goes on to identify that the Government: *“...will take action to establish and extend UK leadership in the following priority areas”,* which amongst others includes developing: *“...smart systems for cheap and clean energy across power, heating and transport”* (page 44).

5.13.4 Page 45 of the Strategy recognises that: *“Smart systems transform our ability to use clean energy cost-effectively...we are setting ourselves the challenge of remodelling it [the national electricity grid] so it can handle many different sources of clean energy, and use new technologies to store energy and manage demand...”*

5.14 Single Department Plan (June 2019)

5.14.1 In June 2019, the Department for BEIS published 'The Single Department Plan'. The plan identifies five overarching objectives, including ensuring that: *'the UK has a reliable, low cost and clean energy system'*. This objective is broken down into the following sub-objectives:

- *"Set out a vision for the energy system consistent with the Government's 2050 climate goals, with concrete actions that the Government will take up to 2030" – to be achieved by (amongst others): "delivering an ambitious Energy White Paper addressing the transformation of the GB electricity system, including proposed legislation where appropriate"; and "further developing carbon capture, use and storage deployment, to support decarbonisation and meet our legally binding carbon budgets, including potential 'net zero' by 2050."*
- *"Support clean growth and promote global action to tackle climate change" – to be achieved by (amongst others), "working with business...to deliver the Clean Growth Strategy, our legally binding greenhouse gas emissions reductions targets..."; "becoming the first major economy to legislate for net zero. Maintain the UK's position as a global leader in cutting emissions while growing the economy, and develop world leading sectors to drive clean growth across the UK"; and "continuing to decarbonise the power sector by running the next Contracts for Difference allocation round to secure new renewable capacity."*
- *"Ensure our energy system is reliable and secure" – to be achieved by (amongst others): "ensuring reliable supplies of electricity and gas, including for example through...industry to reinstate the capacity market and undertaking a statutory 5- year review of the capacity market."*
- *"Deliver affordable energy for households and businesses" – to be achieved by, "continuing to implement the Government and Ofgem's 'Smart Systems and Flexibility Plan' by 2022, removing barriers to smart technologies, enabling smart homes and businesses, and improving access to markets for new technologies and business models."*

5.15 The Climate Crisis (2021)

5.15.1 The Climate Crisis was published in October 2021, jointly by the Royal Town Planning Institute (RTPI) and the Town & Country Planning Association (TCPA). It is a guidance document aimed at local planning authorities, which advises on planning for climate change.

- 5.15.2 Section 4 of the document refers to the role of development management in mitigating climate change, and specifically, in 4.1.3, principles and good practice for assessing renewable energy generation, storage and distribution.
- 5.15.3 The guidance sets out that, *“Development management should support and not prevent, delay or inhibit proposals for renewable and low carbon energy and associated infrastructure...”* and, *“decision makers...should be prepared to deal positively with the implications of new transport and energy technologies, such as battery storage at scale, infrastructure for electric vehicles, and the deployment of hydrogen technology.”*
- 5.15.4 In determining planning applications for the development of renewable or low-carbon energy and associated infrastructure, local planning authorities are recommended to:
- Expect applicants to have taken appropriate steps to avoid and then mitigate any adverse impacts through careful consideration of location, scale, design and other measures, including ensuring that all reasonable steps have been taken, and will be taken, to minimise any negative impacts.
 - Give significant weight to the wider environmental, social and economic benefits of renewable or low-carbon energy projects and fuel sources, whatever their scale, recognising that small-scale projects provide a valuable contribution to the local area and contribute to security of supply and to cutting greenhouse gas emissions – do not reject planning applications simply because the level of output, or the number of buildings involved, is small.
 - Not require applicants for renewable energy development to demonstrate the overall need for renewable or low-carbon energy.
 - Expect developers of decentralised energy to support the local planning approach for renewable and low-carbon energy set out in the local development plan, and, if not, to provide compelling reasons to justify the departure – but, otherwise, not question the energy justification for why a proposal for renewable and low-carbon energy must be sited in a particular location.

5.16 Policy & Guidance Summary

- 5.16.1 It can be seen from the above review that the policy message on energy security is strong and unambiguous. There is a clear need to ensure security of supply through the development of a diverse

energy generation system to support the increased deployment of renewable energy, increased peak demands and the move to electric vehicles.

5.16.2 Energy storage is considered to be a key component of the future energy mix. The existing storage provision will need to increase significantly by 2030 to be on track to achieve net zero by 2050.

5.16.3 The proposed development would provide a flexible modular energy storage system which could instantly deliver or store power in response to system stress events on the national grid transmission network.

6.0 Planning Assessment

6.1 Principle of Development

6.1.1 There is extensive policy support for the development of BESS to support renewable energy generation at both local and national levels.

6.1.2 In particular Chapter 5 of PPW focusses on *“embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, decentralised renewable energy systems, the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks”*. Paragraph 5.7.12 confirms that proposals for new energy storage facilities should be supported wherever possible. The planning system should support renewable and low carbon energy and associated infrastructure. Accordingly, the proposed development is for associated infrastructure which supports the development and reliability of renewable and low carbon energy.

6.1.3 It is important that the National Grid maintains a sufficient supply of energy at all times. The demand for power can significantly fluctuate throughout different times of the day or year. Without an adequate supply of energy there is a risk of power shortages and blackouts. In order to mitigate this risk, the National Grid relies on either additional energy generation/source to run as a backup, or a reduction in electricity demand to ensure the essential balance between energy and supply. The proposals are at an advanced stage in terms of grid connection negotiations and are considered to be feasible and approved by the network provider.

- 6.1.4 Battery storage is an important element in the UK energy mix as part of the shift from conventional power stations to renewable energy sources as part of efforts to cut CO2 emissions and to address the climate emergency. In June 2009 the Government raised the UK's ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. Since declaring a climate emergency in 2019, and responding to advice from the Climate Change Committee, Wales has legislated to reduce greenhouse gas emissions to net zero by 2050. In order to achieve this goal, decarbonising the power sector will be a vital component requiring major investment in proven technologies, such as battery storage.
- 6.1.5 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050 and the Council has declared a climate emergency. This requires major investment in proven technologies, such as renewable energy and battery storage, which is supported by planning policy at local and national level. Battery storage proposals, such as the proposed development, help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand.
- 6.1.6 Whilst the battery storage facility does not in itself generate renewable energy, it facilitates the generation of renewable energy (such as solar and wind) by creating flexibility in the network to address fluctuations in demand and supply. Battery storage systems play a vital part in the transition to a low carbon energy system.
- 6.1.7 The proposed development is a sustainable development utilising proven technology to support the use of renewable energy as the UK moves towards net-zero carbon. The proposals meet the requirements of the PPW and are supported by Local Development Plan policies SP1, SP18 and RE1. In particular Local Development Plan Policy SP18 which supports renewable energy schemes, subject to there being no over-riding environmental and amenity considerations. The proposals are also in accordance with Policy SP1 which seeks provisions to be made for the appropriate contribution to renewable and low carbon energy generation, of which battery storage is a key component.

6.2 Highways and Transport

- 6.2.1 The proposed access into the site is off a road that is extremely lightly trafficked. Clear visibility on both directions for vehicles accessing the site is available.
- 6.2.2 Traffic generated during construction will be minimal and will be over a very limited period as the

compound is largely prefabricated off-site. Construction is expected to take less than three months, with few vehicle movements.

6.2.3 Once operational, there will be no staff based on site and the facility will be managed remotely. The site will be visited for routine maintenance and inspections, which is expected as a maximum to be one to two, two way movements per week as a worst case assumption.

6.2.4 The proposed development would not have a severe impact upon the operation of the local highway network, and there are no transport related reasons why the development should not be permitted.

6.3 Landscape and Visual Impact

6.3.1 The proposed site layout and equipment has been designed to serve a specific function and to fulfil its purpose. The siting of the facility has been carefully selected to occupy a discrete position within the site benefiting from existing landscaping.

6.3.2 As the site is within an industrial park and the M4 runs elevated along the northern boundary of the site, and therefore a BESS will not be an incongruous form of development in this location. The site will be enclosed by 2.4 metre high galvanised fencing and therefore the proposed development would not have a harmful impact on the character of the area.

6.4 Wildlife and Biodiversity

6.4.1 The application is supported by a Preliminary Ecological Appraisal.

6.4.2 The survey findings concluded that the site consists of regularly mown grassland, some semi-improved grassland, and gravel. To the north, there's scrub under the M4 motorway, and to the south, an industrial unit and car park. It has moderate botanical diversity with a few species typical of more diverse grasslands but is not considered a Habitat of Principal Importance under Welsh law. There is minimal risk of significant impact on protected or notable species, though small numbers of foraging bats and birds may be displaced unless mitigation measures are taken. Adjacent habitats may support wildlife like reptiles, hedgehogs, and nesting birds, but these won't be directly affected by the proposed works.

6.4.3 As can be seen on the accompanying site layout plan, an area along the northeast boundary has been dedicated as a biodiversity net gain zone where habitat piles, planting a seed mix to include kidney vetch to benefit small blue butterfly and the creation of invertebrate banks will be included to improve

the net benefit for biodiversity.

6.5 Residential Amenity and Noise Assessment

- 6.5.1 There will be no emissions associated with the facility itself. Therefore, an air quality impact assessment is not considered necessary to support the application. The site is within an industrial and commercial area and there are no residential uses within close proximity to the site that could be impacted.
- 6.5.2 The proposed plant will operate 24 hours a day, but the actual functioning will only occur for a brief 2-hour window when energy is imported, typically starting at 1pm in summer when solar energy is abundant. The plant will then discharge energy during peak demand, between 5-7pm.
- 6.5.3 The sound generated by the plant is linked to the current running through the technology, so the highest noise levels will occur only for 4 hours a day. These worst-case sound levels are further influenced by external temperature, as the main noise comes from the thermal control components. Therefore, the highest noise levels are expected during the hottest parts of the day in summer, with quieter levels in the evening, night, and outside of the summer months.
- 6.5.4 The submitted Acoustics Report confirms that the noise assessment was undertaken in accordance with the guidelines set out in the relevant British Standard and the proposed development will not generate unacceptable noise levels that would cause harm to local residential amenity.

7.0 Flooding

- 7.1.1 The submitted Flood Consequences Assessment confirms that the site is located in Flood Zone 1, the lowest category of flood risk.
- 7.1.2 A surface water drainage strategy will manage runoff from impermeable areas, with discharge planned to the nearest discharge receptor. A filter drain is proposed along the eastern and northern site boundaries, directing water to an existing tributary connection. The filter drain will be sized to provide and attenuation volume to manage the surface water runoff from the new impermeable surface areas. It will also allow water infiltration where possible, convey water to the tributary, and improve water quality as runoff passes through the gravel.
- 7.1.3 The proposed development is considered to be an appropriate land use.

8.0 Conclusion

- 8.1.1 The proposed development comprises the construction and operation of a battery energy storage system on land at Baglan Energy Park, Neath.
- 8.1.2 The principle of BESS is supported by local and national policy as it seeks to address sustainable development by playing a key role in supporting renewable energy generation, a key component of the Government's target of net-zero carbon emissions by 2050.
- 8.1.3 The proposed development can be carried out without resulting in harm to highways, residential amenity, flood risk, the landscape or biodiversity. The benefits of the proposal significantly outweigh any perceived harm.
- 8.1.4 The proposal is therefore considered to benefit from the presumption in favour of sustainable development and planning permission should be granted accordingly.

