



Planning, Design and Access Statement

Proposed Battery Energy Storage System

Land West of Mount Road, Mount Road,
Rhigos, Aberdare, CF44 9YS.

REWE 11 Limited

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Contents

1.0	Executive Summary.....	1
2.0	The Site and Designations.....	3
2.1	Site Location	3
2.2	Site Description	3
2.3	Planning Policy Designations	4
3.0	Relevant Planning History	6
3.1	The Site	6
3.2	The Surrounding Area.....	6
4.0	Site Selection	8
4.1	Overview	8
4.2	Macro Scale Site Search	8
4.3	Optimised Site Selection.....	9
4.4	Avoiding Best and Most Versatile Agricultural Land	10
4.5	Summary.....	10
5.0	The Proposed Development	12
5.1	Energy Storage – An Introduction.....	12
5.2	Summary of the Proposed Development.....	13
5.3	Ecological Enhancements	15
5.4	Site Access	16
5.5	Period of Generation.....	16
6.0	The Need for the Scheme.....	17
6.1	Clean Power 2030 Action Plan: A new era for clean electricity.....	17
6.2	Transition to Net Zero	17
6.3	Increase in Electricity Demand	18
6.4	Decline of centralised fossil fuel power stations and decarbonise the grid	18
6.5	Energy Security Strategy	18
6.6	Declaration of Climate Emergency	19



6.7	National Policy	19
6.8	Conclusions on Need	19
7.0	Benefits of the Proposed Development	21
7.1	Environmental Benefits	21
7.2	Economic Benefits	22
7.3	Social Benefits	24
8.0	Summary of Community Consultation	27
8.1	Statutory Pre-Application Consultation	27
9.0	Planning Policy Context.....	28
9.1	Legislative Context.....	28
9.2	Administrative Context.....	28
9.3	National Development Framework – Future Wales 2040	29
9.4	Planning Policy Wales (Edition 12, 2024).....	30
9.5	Rhondda Cynon Taf CBC Local Development Plan.....	33
9.6	Relevant Development Plan Policies.....	34
9.7	Other Material Considerations	36
9.8	Summary	39
10.0	Planning Assessment	40
10.1	Assessment of the Principle of Development	40
11.0	Assessment of Potential Environmental Impacts	43
11.1	Overview	43
11.2	Landscape and Visual.....	43
11.3	Ecology	44
11.4	Cultural Heritage	45
11.5	Flood Risk and Drainage	46
11.6	Residential Amenity	46
11.7	Fire Safety.....	49
11.8	Arboricultural.....	49
11.9	Traffic	50
12.0	Overall Conclusions	52
12.1	Summary of Planning Policy Requirements	52



12.2	Need for the Proposals	52
12.3	Benefits of the Proposals	52
12.4	Summary of Impacts	54
12.5	Compliance with Planning Policy and Planning Balance.....	54
12.6	Final Conclusions.....	54

1.0 Executive Summary

- 1.1.1 This Planning, Design and Access Statement has been prepared on behalf of REWE 11 Limited in support of a planning application for Battery Energy Storage System (BESS) on land west of Mount Road, Mount Road, Rhigos, Aberdare, CF44 9YS.
- 1.1.2 The site area measures 15.5 hectares and lies within a large agricultural field to the west Mount Road.
- 1.1.3 The application proposes the installation and operation of battery energy storage system (BESS), together with high voltage sub station compound, underground cable route, transformer stations, inverters, site access, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements.
- 1.1.4 The development represents an essential component of the UK's renewable energy infrastructure to meet net zero emissions. The development serves to flatten out the 'peaks and troughs' of renewable energy production to ensure renewable energy is available at all times, not just during daylight hours or when it is windy.
- 1.1.5 The proposals represent a form of low carbon development which would facilitate the efficient operation of the electricity grid and maximise the efficiency of renewable energy generation on the network. The development provides for electrical storage in batteries that can be charged when there is surplus supply of energy on the grid and then deploy the stored power when there is capacity for the grid to accommodate the electrical energy.
- 1.1.6 The proposed development has been designed to be sensitively sited to avoid harmful impacts on the character and appearance of the area. Key to this is a well-designed landscaping scheme, including extensive species rich planting and tree planting, which provides structural landscaping and delivers a net benefit in biodiversity.
- 1.1.7 The site falls within Rhondda Cynon Taf CBC, as such Policies contained within the Rhondda Cynon Taf Local Development Plan 2006-2021 are of relevance to the proposal and form part of the Development Plan.
- 1.1.8 Future Wales represents the National Development Framework and sets out the Welsh Government's land use priorities. Policies 17 and 18, outline the plan's approach to renewable energy generation.
- 1.1.9 Policy 17 makes clear that "*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". The policy also stresses that "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".

- 1.1.10 Planning Policy Wales (Edition 12, February 2024), sets out the national tier of land use planning policies for Wales and is supplemented by a series of Technical Advice Notes (TANs). The document makes numerous references to promoting sustainable development and the need to tackle climate change.
- 1.1.11 Of particular relevance is paragraph 5.7.7, which explains that *"the benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change."*
- 1.1.12 The proposals have been assessed against the relevant Local and National policies and it is concluded that the proposed development is compliant with the Development Plan when taken as a whole. The public benefits of the proposal should weigh substantially in favour of granting permission. The economic and biodiversity benefits should also attract weight in favour of granting planning permission. In conclusion, the planning balance tilts overwhelmingly in favour of granting planning permission.

2.0 The Site and Designations

2.1 Site Location

- 2.1.1 The site is located immediately to the west of Cefn Rhigos, which is a small settlement of approximately 30 dwellings.

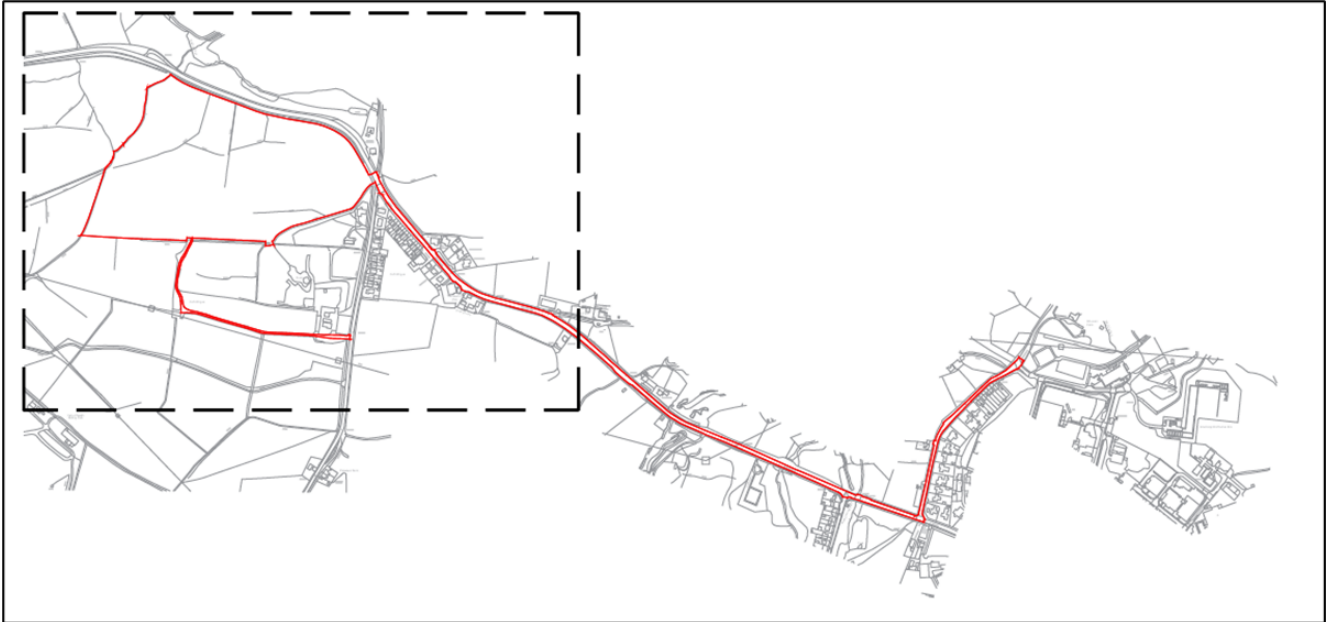


Figure 1 Site Location Plan including cable route

2.2 Site Description

- 2.2.1 The site covers approximately 15.5 hectares and has an irregular shape. It is mostly flat, with a belt of hedgerows and trees along the eastern and northern boundaries, and scattered trees along the western and southern edges. A single tree is situated at the centre of the site. Access is provided through an existing entrance at the southeast corner, off Mount Road.
- 2.2.2 The red line includes the proposed underground cable which would be laid within Mount Road. The cable would then travel east along Rhigos Road and connect into Hirwaun Substation.
- 2.2.3 To the south and west, the surrounding area consists primarily of agricultural fields, beyond which lies Rhigos Airfield. Further south, the Arfield Hendre Fawr Solar Farm is located. To the north and north-east, Rhigos Road runs nearby, with Mount Road positioned beyond the eastern boundary of the site.



Figure 2 Drone Image from drone showing the surrounding landscape of the site from a westerly direction

- 2.2.4 The site is well enclosed by the surrounding topography and to a large extent by existing mature woodland and hedgerows which form the field boundaries. These provide a good level of visual screening of the site from public vantage points, particularly footpaths RHI/6/2 and RHI/27/1 to the north of the site.
- 2.2.5 The site has a predominantly rural character but this character is disrupted by the presence of the overhead power lines and Rhigos Airfield to the south-west of the site. Hendrefawr Solar Farm is also visible from the site at certain locations particularly to the south and west.

2.3 Planning Policy Designations

- 2.3.1 The site is not located in any significant planning designations which include National Landscapes (formerly Area of Outstanding Natural Beauty), National Parks, Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC) and Special Protection Areas (SPA).
- 2.3.2 The Bannau Brycheiniog (Brecon Beacons) National Park lies approximately 700m north of the site boundary at its closest point and care has been taken to sensitively position the development so as to avoid visual impacts upon this landscape.

- 2.3.3 The site is located outside of the flood zones for both the Flood Map for Planning and Development Advice Map.
- 2.3.4 There are no designated or non-designated heritage assets within or adjoining the site. The nearest designated asset is located some 850m north of the northern boundary of the site separated by the A465 Heads of the Valleys dual carriageway. It is a scheduled ancient monument described as 'Craig y Ddinas Hillfort' (reference no. BR178). It is located to the east of Pontneddfechan.
- 2.3.5 There are no Public Rights of Way (PROW) within the site.

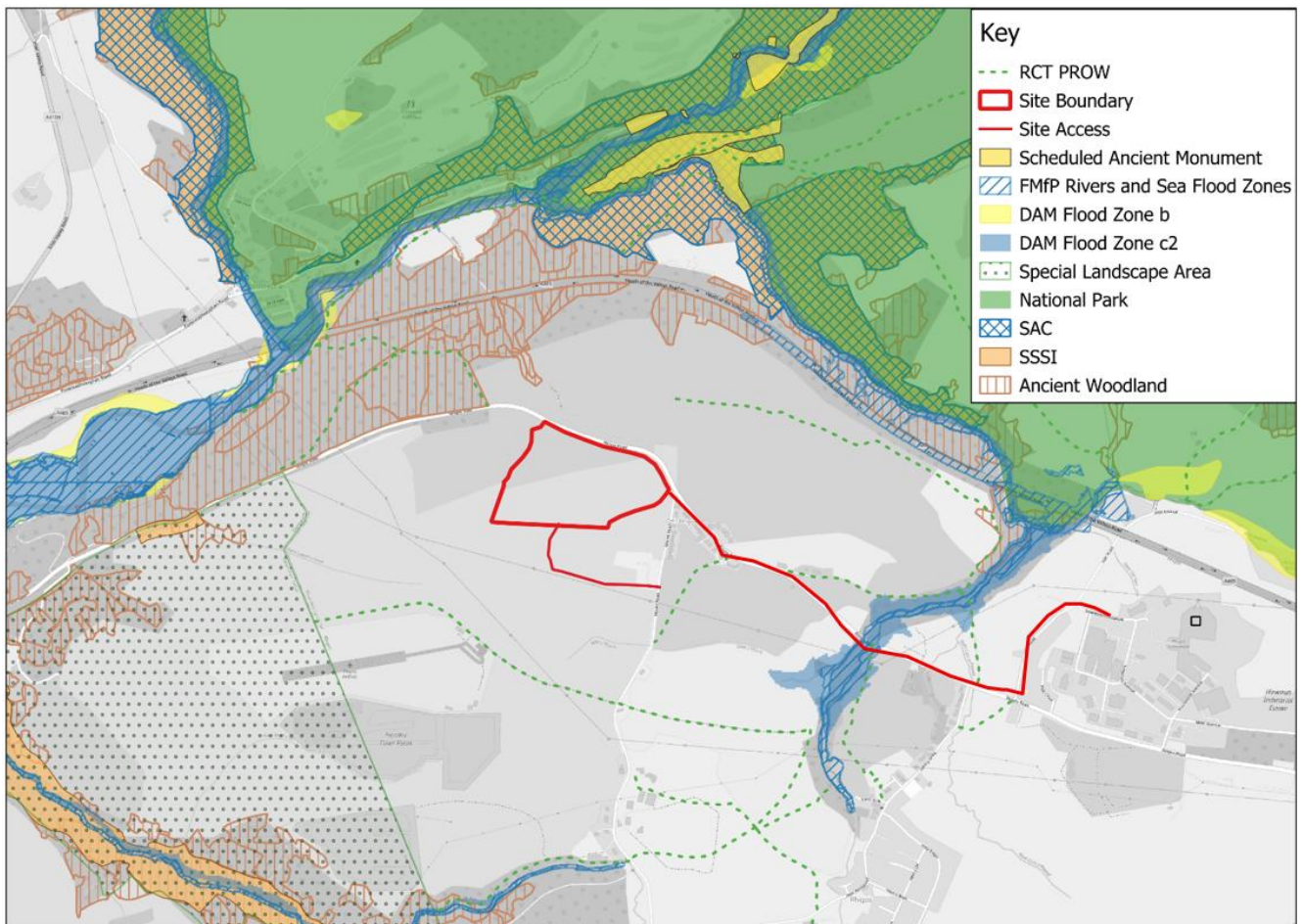


Figure 3 Plan illustrating planning designations near the site with approximate site location overlaid

3.0 Relevant Planning History

3.1 The Site

3.1.1 A review of the planning history of the site showed that the site had been subject to the following planning applications:

Planning Reference	Location	Application Description	Decision
10/0049/10	Land west of Mount Road, Mount Road, Rhigos, Aberdare, CF44 9YS	Raising roof to form first floor accommodation	Granted
20/0302/10	Land west of Mount Road, Mount Road, Rhigos, Aberdare, CF44 9YS	Demolition of garages and construction of a domestic dwelling	Refused
20/1163/10	Land west of Mount Road, Mount Road, Rhigos, Aberdare, CF44 9YS	Demolition of garage block and construction of rural enterprise dwelling (re-submission of 20/0302/10) (Rural enterprise dwelling appraisal received 27/11/2020) (description amended 10/12/2020)	Refused

3.2 The Surrounding Area

3.2.1 A review of the planning history of the surrounding area showed that similar proposals for other developments had been consented. Of relevance are the planning applications below:

Planning Reference	Location	Application Description	Decision
P2012/0635	Land at Hedrefawr Farm, Mount Road, Rhigos, Neath, West Glamorgan	11.6MW solar array including transformer stations, internal access tracks, landscaping, fencing and associated works	Granted

22/0634/10	Bryngolwg Farm, Rhigos Road, Hirwaun, Aberdare, CF44 9UG	Development of a solar farm with ancillary infrastructure, security fence, landscaping and continued agricultural	Granted
21/0104/10	Hirwaun Stor Generation, Main Avenue, Hirwaun	Replace 52 diesel generators with new low carbon battery technology within existing compound	Granted

3.2.2 The plan below at Figure 4 illustrates the above developments within the context of the proposed site:

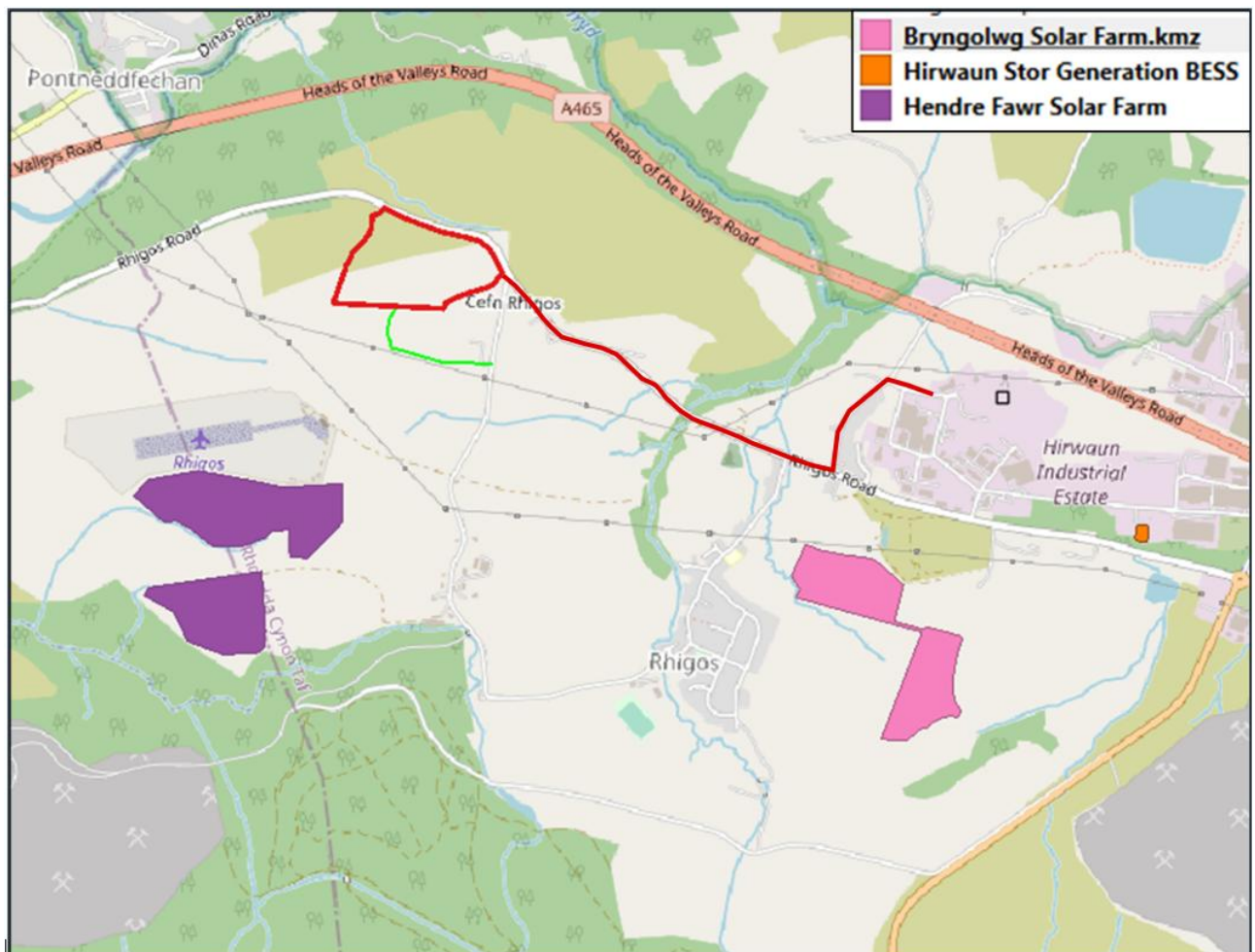


Figure 4 Plan illustrating consented developments of relevance to the proposed site

4.0 Site Selection

4.1 Overview

- 4.1.1 The proposal requires a large site area which is also available to accommodate the proposed development.
- 4.1.2 The proposal must be located within close proximity to an agreed point of connection because as distance from the point of connection increases the scheme will experience increasing thermal losses and incur increasing costs for trenching and cable runs, eroding the financial viability. A shorter cable route also allows for reduced impacts on the local highway network and in the wider environment.
- 4.1.3 The process of site selection is therefore a very challenging exercise which is first driven by the identification of an available grid connection(s), and then a subsequent assessment of the potentially suitable sites within viable proximity that are also available for development with a willing landowner.

4.2 Macro Scale Site Search

- 4.2.1 The proposal represents 'major development' and as such should be located outside of important environmental designations such as National Parks, National Landscapes and other, locally significant landscape designations.
- 4.2.2 The plan below shows the sheer extent of the key area-based planning designations which are avoided from the outset of the site selection process. The site falls outside of these designations and lies within viable proximity to an agreed point of connection to the local electricity network.



Figure 5 Macro (National) Scale Planning Constraints Map with approximate site location identified by red dot

4.3 Optimised Site Selection

- 4.3.1 The site selection process is then refined to identify the most suitable site within viable proximity to the agreed point of connection, considering factors such as grid connection costs and landowner agreements. The search covered an area of approximately 3km from the point of connection, which is usually considered to be the maximum distance from the grid connection point within which the scheme can remain commercially viable.
- 4.3.2 This exercise considers development management and operational needs. Accordingly, the purpose of the site search at this stage is to assess potential sites throughout the search area against the following criteria:-

- A location in an area where there is adequate capacity on the electricity network to accommodate the scheme.
- Be within a viable proximity to a substation with available import/export (MW) capacity.
- Be on relatively flat ground and with suitable ground conditions.
- Outside of the Flood Zone or an area at risk of coastal erosion.
- Be located on a site with a landowner willing to accommodate the project for the planned duration timeframe.
- Be located away from any significant ecologically sensitive sites or features.
- Avoid sensitive landscape designations including National Landscapes and National Parks.
- Be located away from sensitive historic environment features to avoid either direct impacts to below ground resource or upon the setting of other features such as listed buildings.
- Be sited at sufficient distance from noise sensitive receptors in order to prevent any undue impacts on residential amenity.
- Benefit from suitable access for construction and ongoing maintenance purposes.

4.4 Avoiding Best and Most Versatile Agricultural Land

- 4.4.1 Through careful site selection and configuration, the applicant has made significant efforts to avoid the use of Best and Most Versatile (BMV) land.
- 4.4.2 Predictive mapping indicates that the site is located on Grade 5 Agricultural Land. The verification of this land will be made by Welsh Government's Agricultural Land Classification advisory team, who will be consulted during the Pre-Application Consultation process.

4.5 Summary

- 4.5.1 Taking account of the various planning and operational constraints, it is considered that the site location has been well thought-out and is considered to be justified with regards to the key factors driving the site selection process. In particular, it is noted that the proposed site;
1. Lies within viable proximity to the point of an agreed grid connection.
 2. Sits outside of any key planning designations.
 3. Is of an adequate scale and is physically suitable to accommodate the development, being relatively flat and unshaded by nearby topography of vertical features.
 4. Is available for the planned 40-year duration of the scheme.

5. Avoids 'Best and Most Versatile Agricultural' (BMV) Land and the proposals can preserve an agricultural function through grazing.
6. Is distanced from nearby Public Rights of Way.
7. Is distanced from nearby Historic Environment features.
8. Is distanced from nearby residential properties or other potentially incompatible neighbouring land uses.
9. Sits outside of the Flood Zone.
10. Benefits from a suitable access for construction and ongoing maintenance.

5.0 The Proposed Development

5.1 Energy Storage – An Introduction

- 5.1.1 Battery storage technologies are increasingly recognised as essential to accelerating the replacement of fossil fuels with renewable energy generators and playing a pivotal role between green energy supplies and responding to electricity demands.
- 5.1.2 A research paper by the House of Commons¹ explains that Battery Energy Storage Systems (BESS) store electricity at times when supply is higher than demand. This means that electricity can then be released later on when demand is higher than supply. BESS is therefore *“important for the replacement of fossil fuels with renewable energy”*. The paper explains that renewable energy sources such as wind and solar depend on the weather conditions to produce electricity. This means unlike nuclear and fossil fuels they are less adaptable to consumer demand. As a result, the government has said a decarbonised power system will need to be *“supported by technologies that can respond to fluctuations in supply and demand, including energy storage. The government expects demand for grid energy storage to rise to 10 gigawatt hours (GWh) by 2030 and 20GWh by 2035”*.
- 5.1.3 Battery Energy Storage Systems (BESS) are therefore integral to the UK's strategy for achieving a clean power system by 2030. This is outlined in the ‘Clean Power 2030 Action Plan’², which has recently been published by the UK Government (December 2024).
- 5.1.4 Currently there is 4.5 GW of battery storage capacity in Great Britain and the National Energy System Operator (NESO) and the Department of Energy Security and Net Zero (DESNZ) expect that 23-27 GW of battery energy storage will be needed by 2030 to support clean power, which is a very significant level of increase. This expansion is essential for enhancing grid flexibility and reliability, accommodating the variability of renewable energy sources, and reducing reliance on fossil fuels.
- 5.1.5 In Wales, the planning framework supports the development of BESS to facilitate the transition to a low-carbon energy system. Planning Policy Wales emphasises the importance of energy storage in managing the intermittency of renewable energy supply and meeting increased demand from the electrification of heat and transport. Local planning authorities are encouraged to optimise energy

¹ UK Parliament. House of Commons Library. (2024) *Battery Energy Storage Systems*. Available at: <https://researchbriefings.files.parliament.uk/documents/CBP-7621/CBP-7621.pdf> (Accessed: 9 October 2024)

² UK Government. (2024) *Clean Power 2030 Action Plan: A new era of clean electricity*. Available at: <https://assets.publishing.service.gov.uk/media/675bfaa4cfbf84c3b2bcf986/clean-power-2030-action-plan.pdf> (Accessed: 20 December 2024)

storage and support proposals for storage facilities where feasible.

- 5.1.6 In recognition of the importance of electrical storage in moving to net-zero carbon by 2050 (as required by the Climate Change Act 2008), and the interim target of 78% reduction in emissions by 2035 (required by the 6th Carbon Budget), the Government have recently introduced legislative changes to encourage larger and more effective BESS to be processed by local planning authorities (LPA). Previously, proposals for electrical storage above 50MW were subject to approval through the National Significant Infrastructure Projects (NSIP) procedure.
- 5.1.7 The proposals would also relieve development pressure from prospective installations of other, more land-hungry renewable energy schemes. This is because there is currently a lack of effective energy storage within the UK and consequently, many renewable installations are effectively over-installed in relation to the capacity of the grid taking the power. This is done as an attempt to maximise the use of the available grid capacity during sub-optimal periods, but results in an over-supply at peak times, meaning that many renewable systems (wind and solar) are increasingly having to switch off (curtail) in order to prevent damage to the grid. This is of course very inefficient and has resulted in the loss of approximately 13% of total wind energy generation – enough for 800,000 homes and costing £806 million between 2020-2021. Battery storage would allow much of this energy to be captured and would disincentivise this inefficient approach to installing above capacity.

5.2 Summary of the Proposed Development

- 5.2.1 The development will consist of an enclosed compound area containing a BESS development comprising battery units mounted on concrete footings measuring approximately 6 metres in length, 2.2 metres wide and 2.8 metres in height alongside ancillary infrastructure. The development is proposed to be a temporary installation being operational for a period of 40 years, after which the site would be restored to its current agricultural function.
- 5.2.2 The BESS system will have an approximate import/export capacity of approximately 200MW of power. It is proposed that the scheme would connect into Rhigos substation, which is located approximately 1.8km to the east of the proposed site. The connection is proposed via an underground cable within the adopted highway that will connect from a new HV substation on the site.
- 5.2.3 The containers will provide housing for battery infrastructure, a power distribution system and auxiliary systems such as fire suppression and alarm systems, ventilation and cooling system. The developable site area will be enclosed within a palisade fence, enhanced by screening from existing and proposed

vegetation, reducing visual impact and increasing biodiversity.

5.2.4 The proposal will comprise the following:

- 60 Battery storage units measuring approximately 6m (L), 2.2m (W) 2.8m (height).
- LV-MV Transformer and Inverter Blocks measuring approximately 2.3m in height.
- New High Voltage Substation measuring up to approximately 12m in height.
- High Voltage Substation including the following componentry:
 - transformer measuring approximately 9.4m in height.
 - Substation control building measuring approximately 5.9m in height.
 - Switchgear measuring approximately 3.1m in height
 - Associated ancillary buildings and electrical plant measuring approximately 10m in height.
- Security fencing and CCTV measuring approximately 2.4m in height.
- Water Tank measuring approximately 2.75m in height.
- Acoustic Fencing measuring approximately 3.3m in height.
- Associated underground cabling.
- Equipment foundations, including construction of site drainage.
- Internal access tracks.
- Landscape and ecological enhancements; and
- Temporary construction compound.

5.2.5 These will be located in a sensitive manner so as to minimise visual effects.

5.2.6 The proposed site layout plan is shown below:

- 5 no. tree-mounted bird boxes within suitable retained trees.
- 2 no. hibernacula/habitat piles within undisturbed boundary vegetation.

5.4 Site Access

- 5.4.1 Site access is proposed from an existing access off Mount Road.
- 5.4.2 A Transport Assessment has been undertaken in the form of a Transport and Access Statement. This statement accompanies the planning application and explains the proposed vehicular access arrangements for the scheme and outlines the proposed approach to mitigating any impacts caused through the construction stage.

5.5 Period of Generation

- 5.5.1 The proposal will be temporary for 40 years, full decommissioning would be secured via a planning condition. The nature of the construction means the scheme can be easily reversed and would leave a positive legacy of biodiversity and landscape improvements for the site.
- 5.5.2 Full details of decommissioning would be agreed in writing with the Local Planning Authority prior to any works taking place to remove the components and infrastructure.

6.0 The Need for the Scheme

6.1 Clean Power 2030 Action Plan: A new era for clean electricity

- 6.1.1 The 'Clean Power 2030 Action Plan: A new era for clean electricity' was published by Welsh Government in December 2024. The plan reflects the shared renewable ambitions of the UK, Scottish and Welsh Governments.
- 6.1.2 Figure 7 shows that currently there is 4.5 GW of battery storage capacity in Great Britain, the majority of which is grid-scale. The National Energy System Operator (NESO) and Department of Energy Security and Net Zero (DESNZ) expect 23-27 GW of battery storage to be needed by 2030 to support clean power, which is stated as a *“very significant increase”*.

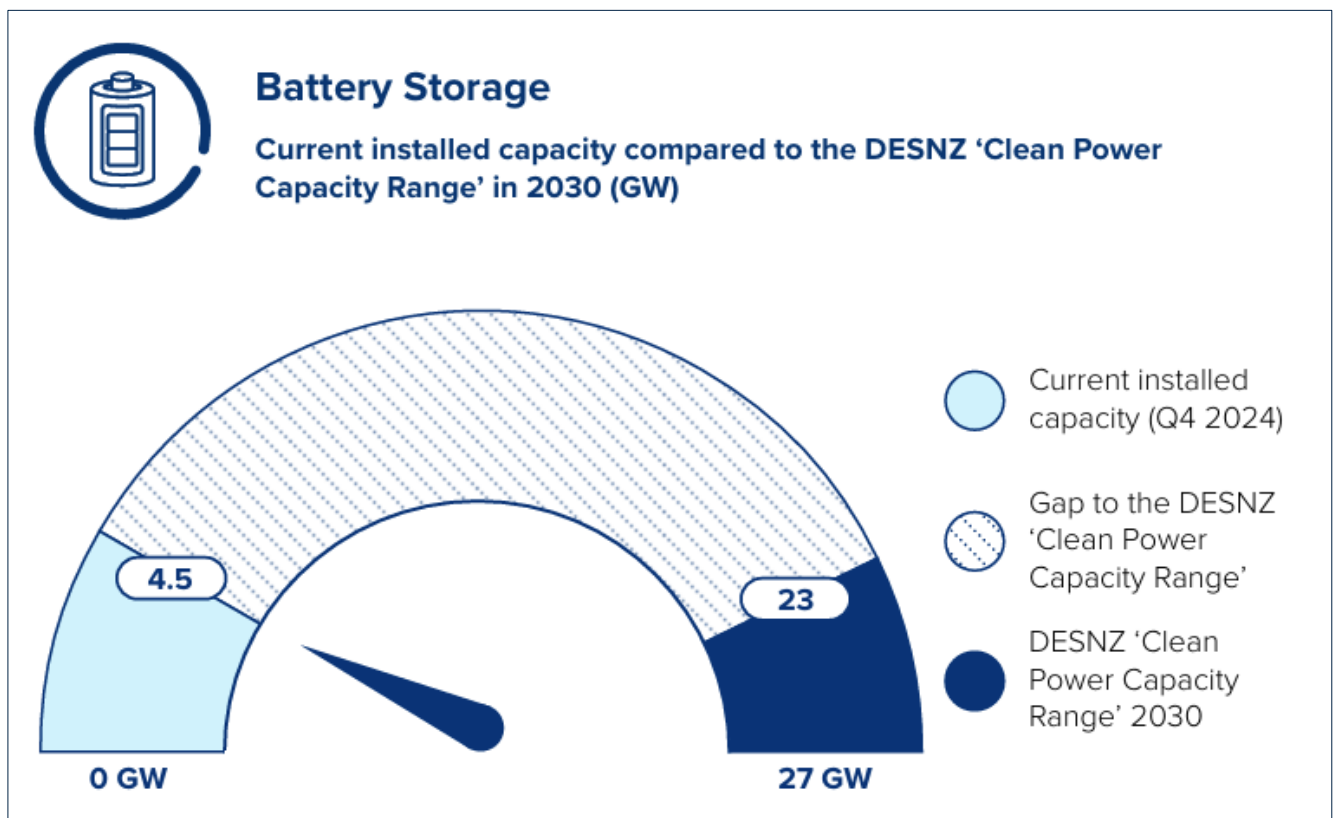


Figure 7 Graphic illustrating the current installed battery storage capacity against the predicted requirement (source: Clean Power 2030 Action Plan)

6.2 Transition to Net Zero

- 6.2.1 The Climate Change Act legally commits the UK government to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050.
- 6.2.2 The environmental impact of climate change is also linked to significant damage to the UK economy.

Combined with the net-zero transition (estimated to cost a maximum of 2% of UK GDP) is expected to have a net benefit of around 4% of GDP (LSE 2022), meaning addressing climate change will protect and benefit the UK economy.

6.3 Increase in Electricity Demand

6.3.1 The UK's electricity demand is predicted to double by 2050 due to widespread use of heat pumps and electric cars.

6.3.2 The need to optimise the use of both planned and existing renewable energy assets is essential not only as a means of combatting climate change, but also to secure our own domestic energy supply with various factors exacerbating the current pressure on the grid, including:

- The current energy crisis resulting from foreign gas supplies.
- The increased political pressure to ensure a self-sufficient supply of UK domestic energy.
- The transition to electric vehicles, which is projected to increase electricity demand.
- The move away from gas boilers and an increased pressure on domestic heating supply.

6.4 Decline of centralised fossil fuel power stations and decarbonise the grid

6.4.1 Seven nuclear power stations have been decommissioned in recent years, and all 14 UK coal-fired power stations closed in September 2024. The urgent need for clean renewable energy to reduce carbon emissions is a pressing issue.

6.4.2 Examples of mass decommissioning of fossil fuel power stations are Eggborough and West Burton A. Eggborough, a 2-gigawatt coal-fired generating plant in North Yorkshire, stopped generating in March 2018. West Burton A in Nottinghamshire closed in March 2023. The last coal-fired power station to be operational was Ratcliff on Soar, which closed on 30th September 2024. The urgent need is not only to replace these generators but to ensure that we maximise the benefits of energy generation from renewable sources.

6.5 Energy Security Strategy

6.5.1 HM Government's Powering Up Britain: Energy Security Plan (March 2023) sets out the steps the Government is taking to ensure the UK is more energy independent, secure and resilient. It states that *"Energy security necessarily entails the smooth transition to abundant, low-carbon energy. If we do not decarbonise, we will be less energy secure."* The Plan builds upon the ambitions set out in the British Energy Security Strategy and the Net Zero Strategy.

6.6 Declaration of Climate Emergency

6.6.1 RCT have set out its targets and commitments in tackling Climate Change in their 'Tackling Climate Change Strategy 2024-30 – 'Working with our Communities'. It says that RCT by 2030 will be:

- A carbon neutral Council.
- The County Borough will be as close to carbon neutral as possible.
- They will have contributed to meeting the Welsh Government's ambition of a net zero public sector.

6.7 National Policy

6.7.1 Future Wales – The National Plan 2040, is Wales's National Development Framework, which sets the direction for development in Wales to 2040. It is a development plan with 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 wellbeing of communities. Of particular relevance to the proposed development is Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure.

6.7.2 Policy 17 states that "The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs". It directs decision makers to give "significant weight" to Wales's international commitments and target of generating 70% of consumed electricity by renewable means by 2030.

6.7.3 Planning Policy Wales (PPW) edition 12 was adopted February 2024 and sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

6.8 Conclusions on Need

6.8.1 Clean Power 2030 is a recently published plan by the UK Government in conjunction with the Welsh Government, which sets ambitious targets for BESS by 2030.

6.8.2 The Climate Change Act commits the UK government to reaching net zero by 2050. The HM Government's Net Zero Strategy confirms that by 2035, the UK will be powered entirely by clean electricity.

6.8.3 Electricity demand is set to double by 2050 and the biggest benefit to solar farms is their role in meeting

the National Grid's renewable energy needs, providing green electricity and reducing the reliance on fossil fuels.

- 6.8.4 As a result of the decommissioning of nuclear power and coal fired power stations by 2025 there is an urgent need not just to replace these generators but to double electricity generation.
- 6.8.5 Considering all of the above, it is clear that there is a demonstrable need for BESS development and the proposed development will contribute to this need. Significant weight ought to be given to the benefits of renewable energy in the context of this unprecedented need.

7.0 Benefits of the Proposed Development

7.1 Environmental Benefits

- 7.1.1 RCT have set out its targets and commitments in tackling Climate Change in their 'Tackling Climate Change Strategy 2024-30 – 'Working with our Communities'. Within this report they include 'increased green energy produced from renewables' as one of their objectives by 2030. This proposal will seek to increase the opportunities of local renewable energy sources and help to move towards low carbon energy sources.
- 7.1.2 Renewable energy generators such as wind and solar require connection to the existing grid infrastructure. The intermittent nature of renewable energy, insofar as being generated during sunny weather or windy periods, results in over-supply of power which grid is unable to accommodate. Energy supply is therefore restricted during these periods resulting in significant losses through the curtailment of renewable energy generators and the energy loss which would have otherwise been generated. At such times, because the Transmission Network is restricted in its ability to transmit such renewable energy generation to the point of need, National Grid (at consumer expense) pays to switch off the renewable energy generation and subsequently pays to switch on a fossil fuel generator closer to the demand. BESS instead is able to store the renewable sources and export the energy later on when its need is at its peak. It can therefore remove the reliance upon non-renewable energy sources, when the wind isn't blowing or the sun isn't shining.
- 7.1.3 This represents a clear challenge to the deployment of renewable energy and recent research has shown that between 2015-2021 in the UK, 13% of the total wind energy generated was curtailed³. This is a growing issue as more renewable energy generators are connected to the grid where in 2020/2021 enough energy to power 800,000 homes was curtailed⁴.
- 7.1.4 The development would serve to optimise the output capacity of the existing renewable energy generation connected to the network. It will do this by storing the energy produced during periods when the capacity of the grid has been reached, thus preventing potential curtailment of such generating stations. This power could then be redeployed at times when there is suitable capacity on the grid, including times when renewable energy generators are not operational. This has the potential to off-set

³ Renewable Energy Foundation (2022) *Constraint Payments to Wind Power in 2020 and 2021*. Available at: <https://www.ref.org.uk/ref-blog/371-constraint-payments-to-wind-power-in-2020-and-2021>

⁴ Current + (2022) *Cost of wind curtailment hits record high of £507m in 2021*. Available at: https://www.current-news.co.uk/cost-of-wind-curtailment-hits-record-high-of-507m-in-2021/?utm_source=rss-feeds&utm_medium=rss&utm_campaign=rss

the use of fossil fuel generated power from sources such as coal and gas.

7.1.5 Conversely, the development would limit the need for other forms of energy generation from non-renewable sources, which often rely on either natural gas or diesel generators. These generators are often referred to as 'Peaker Plants' as their commercial behaviour is to generate mostly at peak times when prices are typically highest in the day.

7.1.6 The proposal would also deliver a Biodiversity Net Benefit. The proposed landscaping measures therefore serve a dual purpose in screening the site and increasing the ecological value of the immediate site area.

7.2 Economic Benefits

7.2.1 As explained above the curtailment of energy in 2020/2021 was enough to power 800,000 homes. As such, the ability to capture energy which would otherwise be lost due to the limited capacity of the grid is a significant direct economic benefit. The curtailment between 2020 and 2021 cost £806 million⁵.

7.2.2 The fluctuation in energy supply from renewable energy also has considerable implications to the wholesale price of electricity. In instances where the demand on the network exceeds the overall supply there is a need to increase the deployment of energy from non-renewable sources, including from imported oil and gas markets. This results in increased consumer energy prices at peak times and can result in unaffordable energy prices and fuel poverty. The ability to closely align energy supply with demand on the network would therefore help to reduce fluctuations in energy pricing and allow for a more sustainable pricing model for consumers.

7.2.3 Ensuring a consistent, reliable energy supply would also provide clear economic benefits to local businesses and services and would provide certainty as to the ongoing sustainability of such services.

7.2.4 Wider economic spin-off benefits would be achieved via the following means:

- Plant and equipment hire
- Benefits to the hospitality sector through hotel and restaurant bookings
- The use of locally sourced construction materials for ancillary components of the development
- The use of local haulage companies

⁵ Current + (2022) *Cost of wind curtailment hits record high of £507m in 2021*. Available at: https://www.current-news.co.uk/cost-of-wind-curtailment-hits-record-high-of-507m-in-2021/?utm_source=rss-feeds&utm_medium=rss&utm_campaign=rss

- 7.2.5 In addition to these construction phase benefits, there will also be contracts issued in relation to the ongoing operation and maintenance of the development covering a wide range of activities including;
- Remote performance monitoring of the scheme
 - Landscaping contracts relating to the maintenance of hedgerows and wildflower areas
 - Periodic cleaning and maintenance of all componentry
 - Site security contracts
- 7.2.6 The energy crisis is expected to lead to fuel poverty and risk for small businesses. A transition to secure UK-produced energy could mitigate this, resulting in reduced energy bills and supply security. Economic benefits of the project would be realised through reduced energy bills and security of supply which will reduce the UK's exposure to the volatility of the wholesale energy markets (particularly the natural gas market). This is crucial for addressing fuel poverty, which disproportionately affects low-income households and contributes to economic inequality.
- 7.2.7 The proposed scheme would be delivered without any government subsidy support and is intended to use existing grid infrastructure, avoiding costly upgrades to the network. This would provide reliable tax revenue for its duration.
- 7.2.8 The proposal also addresses the growing demand for decentralised electricity, allowing the transition to electric vehicles and heating without causing economic fluctuations.
- 7.2.9 As discussed, the curtailment of energy in 2020/2021 cost £806 million, highlighting the significant economic impact of wasted energy due to grid limitations. A circa 200MW battery energy storage scheme such as this would provide a direct economic benefit by capturing energy that would otherwise be lost. By storing excess renewable energy during periods of high generation, the system could avoid curtailment costs, providing a substantial contribution to reducing the total £806 million in losses each year. Over a 40-year period, this would result in an estimated £32.24 billion of avoided costs (based on £806 million annually). This is a significant value added to the economy, providing both direct financial savings and enhanced grid efficiency.
- 7.2.10 In addition to curtailment avoidance, this scheme would stabilise the energy supply and reduce reliance on expensive peak-time energy generation, especially from non-renewable sources. This would mitigate fluctuations in the wholesale electricity price, ensuring a more predictable pricing structure for consumers. The ability to align supply and demand on the grid would lead to lower energy prices during peak demand, potentially reducing consumer bills and mitigating the risk of fuel poverty. This is

especially important for low-income households, who are disproportionately affected by energy price volatility. A consistent, affordable energy supply would foster economic stability by providing businesses with more predictable energy costs, helping them plan and grow without the burden of unpredictable price hikes.

7.2.11 The battery storage system would also generate wider economic spin-off benefits, particularly during the construction and operational phases. Local businesses would see an increase in demand for services such as plant and equipment hire, hospitality (e.g., hotel and restaurant bookings), and construction materials. Ongoing operations, including remote performance monitoring, landscaping, and security contracts, would continue to provide long-term job creation and economic activity. These benefits, combined with tax revenues generated from the operation of the scheme, would contribute to local economies over its 40-year lifespan. It would also support the wider agricultural enterprise of the landowner during uncertain times for farming businesses.

7.2.12 By providing a solution that does not rely on government subsidy and utilises existing grid infrastructure, the proposed battery storage system would seek to avoid costly network upgrades. This would ensure a stable, secure energy supply and protect the UK from the volatility of international energy markets, especially in relation to natural gas. Furthermore, the scheme would contribute to the growing demand for decentralised electricity, facilitating the transition to electric vehicles and heating without causing economic disruptions. Over time, the cumulative gross value added to the UK economy from the avoided curtailment costs, price stabilisation, and wider economic benefits is estimated to be in the region of £32.24 billion over the 40-year period. This supports both energy security and long-term economic growth.

7.3 Social Benefits

7.3.1 The proposal aims to decrease the UK's reliance on imported fossil fuels thereby enhancing energy security and control over future prices. It will contribute to stable, cost-efficient, local energy production, benefiting all households in the UK in the short and long term.

7.3.2 The Clean Power Action Plan (December 2024) published by the UK Government in conjunction with Welsh and Scottish Governments states in the Secretary of State's foreword:

"Since Russia's invasion of Ukraine, Britain has experienced a devastating cost of living crisis caused by our exposure to volatile fossil fuel markets. Every family and business in the country has paid the price and we remain exposed to future energy shocks. In an increasingly unstable world, our

dependence on fossil fuels leaves us deeply vulnerable as a country – and that is true no matter where they come from.

But there is a solution: by sprinting to clean, homegrown energy, we can take back control from the dictators and the petrostates. That is why the Prime Minister has put delivering clean power by 2030 at the heart of one of his five missions and Plan for Change.

The age of clean electricity is about harnessing the power of Britain's natural resources so we can protect working people from the ravages of global energy markets. This plan will provide the foundation for the UK to build an energy system that can bring down bills for households and businesses for good. And it is also about creating the sort of country that we know people want to see - reindustrialising our heartlands with good jobs and tackling the climate crisis."

- 7.3.3 The proposals would help to support the supply of electricity on the local electricity network at a time when National Grid have had to consider extreme options for managing their supply, including potential power outages.
- 7.3.4 The proposals would help to increase the availability of tools such as Voltage Regulation, Frequency Response, Inertia and Blackstart services, available to the National Grid. Such tools are critical to the safe, reliable, secure and efficient operation of the National Grid network.
- 7.3.5 The reinforcing of the Grid also has the advantage of improving the resilience of the network in the area and nationally. This improves the reliability of the electricity network, in-turn providing benefits to productivity to businesses and communities that rely on a stable electricity supply.
- 7.3.6 The potential for such outages are a real prospect in the context of the current challenges faced, with restricted supply of natural gas from volatile foreign markets and increased demands on the network, particularly during cold periods.
- 7.3.7 The demand for electricity is increasingly interwoven with all facets of contemporary society. Power outages would therefore cause significant impacts upon society with both businesses and local services being affected. The consequences of this disruption could manifest itself in a variety of way and would undermine many of the services and social opportunities we take for granted.
- 7.3.8 The ability to store and deploy electricity on demand represents a significant benefit which would help to support the sustainability of all aspects of social life in the UK and contribute towards safeguarding energy security within the UK.

7.3.9 The applicant plans to discuss a community benefit fund with parish councils during the application process. They invite them to submit details of local community projects that would benefit from funding and preparing an agreement for capital funding. It has been stressed that the fund is separate from the planning process and will not affect the rights of people or groups involved in making representations about the proposals to the Local Planning Authority.

8.0 Summary of Community Consultation

8.1 Statutory Pre-Application Consultation

8.1.1 TBC after PAC

9.0 Planning Policy Context

9.1 Legislative Context

- 9.1.1 In 2019 a Statutory Instrument was made to amend the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) Regulations 2016 in such a way that energy storage facilities were removed from the definition of “generating station”, with the effect that the development of such facilities do not represent a Development of National Significance (DNS).
- 9.1.2 Similarly, the Planning Act (2008) was revised in December 2020 to clarify that ‘electrical storage facilities’ are exempt from the Act’s definition of a ‘Generating Station’ and can thus be considered by Local Planning Authorities under the Town and Country Planning Act (1990) and therefore do not represent Nationally Significant Infrastructure Projects irrespective of their scale. In making this change the UK Government stated:
- 9.1.3 *“the planning impacts of the types of storage being deployed (predominantly batteries), are much lower than other forms of generation”⁶*. Indeed, battery energy storage systems have smaller footprints, low vertical extents and limited noise effects compared to all other forms of electrical energy generation.
- 9.1.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 Act confirms that the application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Under Section 38(4) of the Act the Development Plan in Wales comprises the following:
- The National Development Framework for Wales;
 - The Strategic Development Plan (SDP) for any strategic planning area that includes all or part of that area; and
 - The Local Development Plan (LDP) for that area.

9.2 Administrative Context

- 9.2.1 The site is located wholly within the administrative area of Rhondda Cynon Taf CBC and within the community council area of Rhigos.

⁶ Proposals regarding the planning system for electricity storage (July 2020) *Department for Business, Energy and Industrial Strategy*. Available at: <https://assets.publishing.service.gov.uk/media/5f0d6fb1d3bf7f03a0192ce8/proposals-for-planning-system-electricity-storage-govt-response.pdf>

9.3 National Development Framework – Future Wales 2040

9.3.1 Future Wales sets the direction of development to 2040 and is the country's highest tier of development plan, setting out strategic policies at a national scale. Its publication follows the Welsh Government's declaration of a climate emergency in April 2019, and tackling climate change is a central theme running throughout the document. Indeed, the document explains that it is a:

“development plan with 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.”

9.3.2 The NDF does not contain statements on all land use planning issues set out in Planning Policy Wales but presents policies of national priority issues or matters which are distinctly spatial and require national leadership. In this regard, the document states that:

“deciding where to locate renewable energy generation technology is a spatial issue of such significance that national ambitions are unlikely to be achieved without national planning policies.”

9.3.3 With regards to Renewable Energy, the NDF states that:

“Wales is abundant in opportunities to generate renewable energy and the Welsh Government is committed to maximising this potential. Generating renewable energy is a key part of our commitment to decarbonisation and tackling the climate emergency. We have set the following ambitious targets for the generation of renewable energy:

- For 70% of electricity consumption to be generated from renewable energy by 2030.*
- For one gigawatt of renewable energy capacity to be locally owned by 2030.*
- For new renewable energy projects to have at least an element of local ownership by 2020.”*

9.3.4 Future Wales sets out 11 ‘outcomes’ which are described as “overarching ambitions based on the national planning principles and national sustainable placemaking outcomes”. Number 11 of these outcomes is centred on decarbonisation and climate-resilience, stating that *“the challenges of the climate emergency demand urgent action on carbon emissions and the planning system must help Wales lead the way in promoting and delivering a competitive, sustainable decarbonised society.”*

9.3.5 Policy 17 states that:

“the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. 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.”

9.3.6 It goes on to state that *“proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.”*

9.4 Planning Policy Wales (Edition 12, 2024)

9.4.1 Planning Policy Wales (Edition 12, July 2024) sets out the national tier of land use planning policies for Wales and is supplemented by a series of Technical Advice Notes (TANs). The document makes numerous references to promoting sustainable development and the need to tackle climate change.

9.4.2 The document references the seven goals of the well-being and future generations act, stating:

“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.”

Support for Renewable and Low Carbon Energy

9.4.3 Paragraph 5.7.7 explains that *“the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change.”*

9.4.4 Paragraph 5.9.1 demonstrates PPW’s support for renewable energy, stating that: *“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”.*

9.4.5 Paragraph 5.9.15 states that *“Outside identified areas, planning applications for renewable and low*

carbon energy developments should be determined based on the merits of the individual proposal. The local need for a particular scheme is not a material consideration, as energy generation is of national significance and there is recognised need to optimise renewable and low carbon energy generation.”

9.4.6 Paragraph 5.9.19 outlines what planning authorities should take into account when determining applications for renewable and low carbon energy technologies. It states they should take into account:

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

9.4.7 It also states at Paragraph 5.9.20 that *“planning authorities should also identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low carbon energy development”* during construction, operation, decommissioning, remediation and aftercare by taking into account impacts on local communities such as noise and air pollution, impact on the natural and historic environment, cumulative impact, the capacity of and effects on the transportation network, grid connection issues and the impacts of climate change on the location, design, build and operation of the development.

9.4.8 Furthermore, Paragraph 5.9.21 states that *“Prior to an application being submitted, developers for renewable and low carbon energy developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures.”*

9.4.9 PPW emphasises at Paragraph 5.9.22 whatever the size of a scheme that developers should take an active role in engaging with the local community through pre-application discussions and provision of background information on the renewable energy technology that is proposed.

9.4.10 Paragraph 5.9.25 states that *“the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into, and given weight in the decision making process. However, planning decisions must be based on an assessment of the impacts of the proposed development, irrespective of who the applicant is.”*

9.4.11 Paragraph 5.9.26 continues to explain that *“Experience has shown that there are significant*

opportunities to achieve local benefits through renewable energy developments. Some benefits can be justified as mitigation of development impacts through the planning process. In addition, developers may offer benefits not directly related to the planning process. Local authorities, where practical, should facilitate and encourage such proposals.”

- 9.4.12 Paragraph 5.9.19 sets out the way in which LPA's should approach proposals for renewable energy. Here it is explained that:

“In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:

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

- 9.4.13 Paragraph 5.6.13 relates to Rural Business Diversification and states that *“Diversification can also include renewable energy proposals such as anaerobic digestion facilities or solar and wind installations, which will help to increase the viability of rural enterprises by reducing their operating costs. These schemes should be supported where there is no detrimental impact on the environment and local amenity”.*

- 9.4.14 Paragraph 5.7.10 states that *“Planning authorities should plan positively for grid infrastructure. Development plans should facilitate the grid infrastructure required to support the renewable and low carbon energy potential for the area, particularly areas identified for such development. Planning authorities should support appropriate grid developments, whether or not the developments to be connected are located within their authority.”*

- 9.4.15 Paragraph 5.9.7 of PPW states that *“The local balance of the energy network will be a crucial consideration in this regard, and planning authorities should consider the best places for local renewable energy generation to help improve the resilience of the grid in the future.”*

- 9.4.16 PPW explains that overall power demand is expected to increase as a result of electrification of transport and heat and therefore significant investment in energy generation, transmission and distribution infrastructure will be needed in order to meet this demand.

9.4.17 Paragraph 5.7.6 of PPW outlines that the planning system should secure an appropriate mix of energy provision, it is therefore considered that the proposed BESS would add to the current energy provision within the area. There are several benefits associated with renewable energy developments, the most obvious of which is its contribution to tackling climate change and energy security of which PPW gives this “*paramount importance*”. At Paragraph 5.7.7 it lists several initiatives that the planning system should do, of relevance to the proposed development are:

- Optimise energy storage
- Maximise renewable and low carbon energy generation

9.4.18 With regard to Energy Storage, Paragraph 5.7.12 of PPW states:

“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.”

9.5 Rhondda Cynon Taf CBC Local Development Plan

9.5.1 The application site is located within Rhondda Cynon Taf CBC. The Local Development Plan (2006-2021) was adopted on 2nd March 2011 and remains the adopted Local Development Plan for the purposes of planning policy.

9.5.2 Rhondda Cynon Taf CBC are currently preparing a revised Local Development Plan for the period 2022-2037. This process formally began in April 2022 and will replace the current LDP (2006-2021) once it is adopted.

9.5.3 The revised LDP Delivery Agreement sets out a timetable for the completion of the Revised LDP. We are currently at the ‘Consultation on the Deposit Revised LDP’ key stage, the timetable is reproduced below which shows adoption in May 2026:

Key Stage	Date
Preparation of the Pre-Deposit Stage of the Revised LDP including the Preferred Strategy	From April 2022
Consultation on the Preferred Strategy	January/February 2024
Preparation of the Deposit Revised LDP	March 2024
Consultation on the Deposit Revised LDP	January/February 2025
Submit Revised LDP to Welsh Government	- June 2025
Independent Examination	November/December 2025
Adoption	May 2026

Figure 8 RCT CBC LDP Delivery Agreement

9.6 Relevant Development Plan Policies

9.6.1 The following table(s) summarises the pertinent planning policies of relevance to the proposed development. These are set out in more detail below and the Planning Case section of the report explains how the development proposals are compliant with these policies.

Planning Consideration	Relevant Planning Policy	
Principle of Development	CS1	Development in the North
	AW 12	Renewable and Non-Renewable Energy
Ecology	AW 8	Protection and Enhancement of the Natural Environment
Cultural Heritage	AW 7	Protection and Enhancement of the Built Environment
Residential Amenity	AW 5	New Development
	AW 10	Environmental Protection and Public Health

Renewable Energy

9.6.2 Policy AW 12 (*Renewable and Non-Renewable Energy*) states:

“Development proposals which promote the provision of renewable and non-renewable energy such as schemes for energy from biomass, hydro-electricity, anaerobic digestion, on-shore oil and gas and small/medium sized wind turbines, will be permitted where it can be demonstrated that there is no unacceptable effect upon the interests of soil conservation, agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity.

Development proposals should be designed to minimise resource use during construction, operation and maintenance”

Principle of Development

- 9.6.3 Policy CS 1 (*Development in the North*) sets out a policy framework that seeks to secure regeneration and create sustainable communities in the Northern Strategy Area. The Policy states it will achieve this though adhering to a certain set of Criteria.

Ecology

- 9.6.4 Policy AW 8 (*Protection and Enhancement of the Natural Environment*) aims to preserve and enhance the natural environment of the CBC. It states that development will only be permitted where it meets a certain set of Criteria. An assessment against this criteria will be provided in the following section of this Statement.

Cultural Heritage

- 9.6.5 Policy AW 7 (*Protection and Enhancement of the Built Environment*) outlines that development proposals which impact upon sites of architectural/ or historical merit and sites of archaeological importance will only be permitted where it can be demonstrated that the proposal would preserve or enhance the character and appearance of the site.

Residential Amenity

- 9.6.6 Policy AW 5 (*New Development*) provides a set of Criteria for with regard to Amenity and Accessibility and if these are met developments will be supported.
- 9.6.7 Policy AW 10 (*Environmental Protection and Public Health*) outlines that development proposals will not be permitted where they would cause or result in a risk of unacceptable harm to health and/or local amenity because of:

- Air pollution;
- Noise pollution;
- Light pollution;
- Contamination;
- Landfill gas;
- Land instability;
- Water pollution;
- Flooding;
- Or any other identified risk to the environment, local amenity and public health or safety.

9.7 Other Material Considerations

The Environment (Wales) Act 2016

- 9.7.1 The Environment (Wales) Act 2016 requires Welsh Ministers to reduce emissions in Wales by at least 80% by 2050 against 1990 levels. Since this legislation was enacted, Welsh Government has also approved a more ambitious net zero target to be achieved by 2050.
- 9.7.2 In order to achieve this target, the government has set interim targets for 2030 and 2040, and a series of 5-year carbon budgets. The target for 2030 requires a 63% reduction. The latest data shows Wales' total emissions at 39 million tonnes of carbon dioxide (CO₂) equivalent, a fall of 31% compared to baseline emissions. As such, a further 32% reduction is required in order to achieve the 2030 target.
- 9.7.3 In seeking to achieve this target, in 2017 Welsh Ministers also formally announced an interim target of ensuring that 70% of Wales' electricity demand from Welsh renewable electricity sources by 2030.
- 9.7.4 In addition to setting ambitious renewable energy targets, the Environment (Wales) Act put in place legislation to plan and manage Wales' natural resource. The key parts of the act of most relevance to these proposals are:

Part 1: Sustainable management of natural resources – This aims to enable Wales' resources to be managed in a more proactive, sustainable and joined-up way.

Part 2: Climate Change – This provides Welsh Ministers with powers to put in place statutory emission reduction targets, including at least an 80% reduction in emissions by 2050 and carbon budgeting to support their delivery. This Part formalises comprises legislation to confirm commitments to meeting existing UK and EU obligations and sets a clear pathway for decarbonisation.

- 9.7.5 In order to achieve these statutory objectives (and the more recent Net Zero target), Welsh Government has published its most recent plan covering its second carbon budget through 'Net Zero Wales Carbon Budget 2 (2021 – 2025)'. The plan builds upon the previous Plan ('Prosperity for all: a Low Carbon Wales') and sets out 123 policies and proposals, alongside commitments and action in order to achieve these objectives.
- 9.7.6 The previous plan recognised that the *"planning system has an important role in facilitating decarbonisation"* and Net Zero Wales also recognises this position, with Policy 5 and Policy 6 relating to the National Development Framework and Planning Policy Wales and respectively.
- 9.7.7 In this respect, the plan explains that the NDF *"sets a clear planning policy context for decarbonisation by both preventing and mitigating carbon emissions"*. Similarly, Net Zero Wales explains that *"During Carbon Budget 2 PPW will continue to facilitate decarbonisation through the planning system by providing an ambitious and comprehensive policy framework to address the causes and effects of climate change"*.

Well-being of Future Generations Act

The Well-being of Future Generations Act (Wales) 2015 sets out a 'sustainable development principle' requiring planning decisions to comply with the 7 well-being goals set out in Table 1 on page 4 of the act. These are:

1. A prosperous Wales
2. A resilient Wales
3. A healthier Wales
4. A more equal Wales
5. A Wales of cohesive communities
6. A Wales of vibrant culture and thriving Welsh Language
7. A globally responsible Wales

- 9.7.8 The 'Sustainable Development Principle' as discussed in Paragraph 5 (1) of the Act 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."*

- 9.7.9 Paragraph 5(2) explains that *“in order to act in that manner, a public body must take account of... the importance of balancing short term needs with the need to safeguard the ability to meet long term needs, especially where things done to meet short term needs may have detrimental long term effect.”*

The Energy White Paper – Powering our Net Zero Future, HM Government, December 2020

- 9.7.10 Under the strategy, ‘Energy Storage and Flexibility’ are listed as a priority area for net zero innovation.

- 9.7.11 The strategy acknowledges the challenge faced by a transition to renewable energy supply and states that:

“Electricity markets need to adapt as the deployment of renewable generation increases. Balancing supply and demand becomes more complex because most renewables are, by their nature, intermittent and generate electricity only when the wind blows or the sun shines.”

- 9.7.12 It also recognises the opportunity which energy storage presents, explaining that:

“Increasingly, flexibility will come from new, cleaner sources, such as energy storage in batteries, increased interconnected capacity from neighbouring electricity markets, or from consumers using smart technologies to reduce how much energy they use or shift when they use the energy to different times in the day. New forms of flexibility could lower future costs for consumers, by minimising expensive network reinforcement or reducing the need for additional generation, especially peaking capacity which needs to be deployed quickly to meet spikes in demand.”

The United Nations Paris Agreement on Climate Change 2015

- 9.7.13 The Paris Agreement is a legally binding international treaty on climate change adopted by 196 Parties at COP21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels.

- 9.7.14 The Agreement represents a landmark in the international climate change process because, for the first time, a binding agreement brings all nations into a common cause to combat climate change and adapt to its effects.

- 9.7.15 The DBEIS (now superseded by other government agencies including the Department for Energy Security and Net Zero) plan sets out how the UK we will facilitate the transition to a smarter and more flexible energy system. It explains that:

“The government is committed to leading the way in the transformation of our energy system. A smarter, more flexible system will utilise technologies such as energy storage and flexible demand to integrate high volumes of low carbon power, heat and transport and reach a carbon neutral future”.

9.8 Summary

- 9.8.1 The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the NDF. There is strong national policy support, from the Government’s Energy White Paper (EWP) and National Policy Statement EN-1 2 (NPS), for the development.

10.0 Planning Assessment

10.1 Assessment of the Principle of Development

- 10.1.1 Policy 17 of the NDF makes clear that the Welsh Government “*strongly supports*” the principle of developing renewable and low carbon energy from all technologies. Furthermore, the NDF outlines that “*significant weight*” should be given to Wales’s international commitments and the target of generating 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. It is therefore considered that the principle of development is supported by the NDF.
- 10.1.2 In accordance with PPW, the social, environmental and economic benefits associated with this development should be given weight in the decision-making process.
- 10.1.3 PPW supports this position by stating at Paragraph 5.7.1 “*low carbon electricity must become the main source of energy in Wales*” and proceeds to say that the energy mix will depend on a range of established and emerging low carbon technologies.
- 10.1.4 PPW explains that overall power demand is expected to increase as a result of electrification of transport and heat and therefore significant investment in energy generation, transmission and distribution infrastructure will be needed in order to meet this demand.
- 10.1.5 Paragraph 5.7.6 of PPW outlines that the planning system should secure an appropriate mix of energy provision, it is therefore considered that the proposed BESS would provide enabling infrastructure to allow this mix of energy provision.
- 10.1.6 There are several benefits associated with renewable energy developments, the most obvious of which is its contribution to tackling climate change and energy security of which PPW gives this “*paramount importance*”.
- 10.1.7 This site is not located within an identified area and thus PPW outlines that planning applications outside of identified areas should be determined based on the merits of the individual proposal. It proceeds to say that the “*local need for a particular scheme is not a material consideration, as energy generation is of national significance, and there is recognised need to optimise renewable and low carbon energy generation*”. As such, as has been evidenced within Section 6 of this Statement, there is a national need for this development which is supported by national policy.
- 10.1.8 Paragraph 5.7.6 of PPW outlines that the planning system should secure an appropriate mix of energy

provision, it is therefore considered that the proposed BESS would add to the current energy provision within the area. There are several benefits associated with renewable energy developments, the most obvious of which is its contribution to tackling climate change and energy security of which PPW gives this “*paramount importance*”. At Paragraph 5.7.7 it lists several initiatives that the planning system should do, of relevance to the proposed development are:

- Optimise energy storage
- Maximise renewable and low carbon energy generation

10.1.9 PPW states that the “*the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into, and given weight in the decision making process.*” The benefits of the proposed development have been set out in Section 7 of this statement, which are significant. As such, these benefits should be given weight in the decision making process in accordance with PPW.

10.1.10 PPW supports rural diversification and outlines that renewable energy proposals are included as a form of diversification. It outlines that schemes should be supported where there is no detrimental impact on the environment and local amenity.

10.1.11 Paragraph 5.9.20 states that planning authorities should identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable energy development during construction, operation, decommissioning, remediation and aftercare by taking into account impacts on local communities such as noise and air pollution, impact on the natural and historic environment, cumulative impact, the capacity of and effects on the transportation network, grid connection issues and the impacts of climate change on the location, design, build and operation of the development. All of these factors have been considered in preparing this application, which is supported by a full suite of technical reports which address all of the potential impacts referenced. A detailed assessment of which can be provided within the following section of this Statement.

10.1.12 With regard to Energy Storage, Paragraph 5.7.12 of PPW states:

“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.”

10.1.13 The principle of the proposed development is therefore supported by National Planning Policy.

- 10.1.14 Having regard to Local Policy, Policy AW 12 (*Renewable and non-renewable energy*) of RCT CBC LDP outlines that development proposals which promote the provision of renewable and non-renewable energy will be permitted where it can be demonstrated that there is no unacceptable effect upon the interests of soil conservation, agriculture, nature conservation, wildlife, natural and cultural heritage, landscape importance, public health and residential amenity. This application is supported by a suite of technical assessments and reports which have assessed the potential impacts identified within this Policy. A summary of the assessments and findings are provided in the following section, which conclude that no adverse impacts are predicted.
- 10.1.15 It is therefore considered that the proposal aligns with Policy AW 12 of RCT CBC LDP.

11.0 Assessment of Potential Environmental Impacts

11.1 Overview

- 11.1.1 This application is supported by a full suite of technical reporting and site investigations covering the full range of prospective environmental impacts. This section of the Statement aims to summarise the findings of these assessments.

11.2 Landscape and Visual

- 11.2.1 This application is supported by a Landscape and Visual Appraisal which concludes that the site would be able to accommodate the proposed battery storage development.
- 11.2.2 The site is located outside of any landscape designations such as National Landscape or National Park. Overall, the landscape value of the site has been assessed as being of 'local' value. The features/elements/characteristics identified as important or 'key' to the landscape are:
- Gentle sloped topography on valley plateau;
 - Regular field pattern enclosing rough grassland;
 - Mixed boundaries including tree belts and open boundaries;
 - Historic industrial influence and disturbed land;
 - Upland edge setting to Cynon-valley settlement infrastructure corridor.
- 11.2.3 All of these features will be retained with some enhanced through additional tree and hedgerow planting.
- 11.2.4 It is concluded that the proposed development would be in context to Rhigos Road, existing agricultural activities, settlement and infrastructure in the Cynon valley and close to pylons and overhead cables and that visual effects would be limited by existing tree belts on site boundaries that screen parts of the site from view. The wider landscape also contains trees and vegetation which screen and filter views towards the site. Any views of the proposals would be viewed in context with nearby existing energy infrastructure.
- 11.2.5 Furthermore, proposals for the site include the planting of native trees and scrub, which would help to integrate the proposed development into the landscape over time, whilst reflecting the existing landscape character and providing some enhancement of key features. As the proposed planting establishes, views of the proposed development would also become more limited.

- 11.2.6 The accompanying Landscape and Visual Appraisal therefore demonstrates that there will be no significant adverse impacts on landscape.

11.3 Ecology

- 11.3.1 Policy AW 8 (*Protection and Enhancement of the Natural Environment*) aims to protect the natural heritage of the CBC and outlines development will only be permitted where it does not cause harm to the features of a Site of Importance for Nature Conservation (SINC) or Regionally Important Geological Site (RIGS) or other locally designated sites, unless it can be demonstrated that the proposal is:

- a) *The proposal is directly necessary for the positive management of the site; or*
- b) *The proposal would not unacceptably impact on the features of the site for which it has been designated; or*
- c) *The development could not reasonably be located elsewhere and the benefits of the proposed development clearly outweigh the nature conservation value of the site.*

- 11.3.2 This application is supported by an Ecological Impact Assessment (EclA) which provides a detailed assessment of the potential impacts of ecology as a result of the proposed development.

- 11.3.3 With regard to statutory sites, Blaencynon SAC is located 2.6km east of the site at its nearest point and its designation relates to the population of marsh fritillary butterfly supported. Given the small-scale of the proposals and limited impacts in terms of land take, it is considered that impacts to marsh fritillary (if present) can be readily mitigated with a likelihood of a net benefit for the species as a result of the proposals in the medium to long-term.

- 11.3.4 Given their distance from the site, the confined and relatively small scale of the proposed development and the nature of the development, no impacts are predicted to affect other statutory sites within the wider landscape.

- 11.3.5 Part of Coed Wernhir SINC is located within the northwestern corner of the site boundary. The proposed development avoids this SINC and as such no loss of habitat will occur. As such, the proposal complies with Criterion b) of the above Policy. Nonetheless, the site selection process as set out in Section 3 of this Statement demonstrates that the development would not reasonably be located elsewhere, as per Criterion c).

- 11.3.6 The Policy also states that development proposals will also only be permitted where there are no

unacceptable impacts upon features of importance to landscape or nature conservation. It also states that all development proposals that may affect protected or priority species will be required to demonstrate what measures are proposed for the protection and management of the species and the mitigation and compensation of potential impacts.

11.3.7 A series of mitigation and compensation measures are set out within the EcIA to ensure the protection and enhancement of fauna. With the proposed mitigation and compensation measures, no significant impacts are identified.

11.3.8 Other mitigation and compensation measures have been incorporated which include:

- Retention and buffering of tree lines, ditches and watercourses and adherence to Pollution Prevention for Businesses (2024) guidance during construction;
- Enhancement of retained grassland habitats and reinstatement of hedgerows;
- Method statement to protect reptiles and amphibians during vegetation clearance;
- Sensitive methodology to protect commuting and foraging bats from light spill during construction;
- Precautionary measures for badger, breeding birds, hedgehog and otter

11.3.9 Furthermore, enhancement measures include:

- 5 no. tree mounted bat boxes within suitable retained trees;
- 5 no. tree mounted bird boxes within suitable retained trees;
- 2 no. hibernacula/habitat piles within undisturbed boundary vegetation.

11.3.10 The site therefore provides a biodiversity net benefit with minimal impacts to biodiversity and ecology and thus adheres to Policy AW 8 of RCT CBC LDP.

11.4 Cultural Heritage

11.4.1 Policy AW 7 (*Protection and Enhancement of the Built Environment*) outlines that development proposals which impact upon sites of architectural and / or historical merit and sites of archaeological importance will only be permitted where it can be demonstrated that the proposal would preserve or enhance the character and appearance of the site.

11.4.2 This application is supported by a historic environment desk-based assessment and geophysical survey. The potential for buried archaeological remains was determined as low to moderate for the pre-historic period, high for post-medieval remains in specific areas and low for other periods. It is

recommended that this potential resource could be suitably mitigated through a programme of archaeological monitoring and recording during construction.

- 11.4.3 With regard to built heritage, the proposed development would have no direct impact on the built heritage assets within the study area of the DBA.
- 11.4.4 The development would also have a negligible effect on the significance of the scheduled monuments within the 1km study area.
- 11.4.5 The proposed mitigation will ensure the proposed development would have no significant impact on the built heritage or buried archaeological remains within the site.
- 11.4.6 It is therefore considered that the proposal aligns with Policy AW 7 of the RCT CBC LDP.

11.5 Flood Risk and Drainage

- 11.5.1 The site is located outside of the flood zone as per the Flood Map for Planning and Development Advice Map and is thus at within an area of low flood risk.
- 11.5.2 This application is supported by an Outline Surface Water Drainage Strategy prepared by JBA Consulting, which demonstrates that drainage can be suitably accommodated without any adverse impacts on the environment.

11.6 Residential Amenity

- 11.6.1 Policy AW 5 (*New Development*) provides a Criteria to which developments are supported. An assessment of the proposal against this criteria is provided below:

1) Amenity

- a) The scale, form and design of the development would have no unacceptable effect on the character and appearance of the site and the surrounding area;*

The Landscape and Visual Appraisal accompanying this application demonstrates that the scale, form and design of the development would have no unacceptable effect on the character and appearance of the site and surrounding area subsequently ensuring adherence to Criterion a.

- b) Where appropriate, existing site features of built and natural environment value would be retained;*

The proposal has been carefully positioned away from the existing SINC and all existing site features such as trees and hedgerow will be retained and enhanced as part of the development subsequently ensuring adherence to Criterion b.

- c) *There would be no significant impact upon the amenities of neighbouring occupiers;*

This application is supported by a Noise Impact Assessment, which demonstrates through incorporating appropriate acoustic fencing installed at the boundary to each run of inverters noise levels can be reduced to an acceptable level and thus not significantly impacting the amenities of neighbouring occupiers ensuring adherence to Criterion c.

- d) *The development would be compatible with other uses in the locality;*

Although located within a rural setting, the development would be reflective and compatible with other uses in the locality such as the two solar farms to the south and also Rhigos substation to the east ensuring adherence to Criterion d.

- e) *The development would include the use of multi-functional buildings where appropriate;*

This Criterion is not considered appropriate to the development.

- f) *The development designs out the opportunity for crime and anti social behaviour.*

Security fencing and CCTV will be implemented to ensure crime and anti social behaviour is designed out ensuring adherence to Criterion f.

2) *Accessibility*

- a) *The development would be accessible to the local and wider community by a range of sustainable modes of transport;*

This Criterion is not relevant to the proposal.

- b) *The site layout and mix of uses maximises opportunities to reduce dependence on cars;*

This Criterion is not relevant to the proposal.

- c) *The development would have safe access to the highway network and would not cause traffic congestion or exacerbate existing traffic congestion;*

This application is supported by a Transport Access Statement which demonstrates that that a safe access is achieved to the highway network and it would not result in traffic congestion or exacerbate existing traffic congestion.

- d) *Car parking would be provided in accordance with the Council's Supplementary Planning Guidance on Delivering Design and Placemaking: Access, Circulation and Parking Requirements.*

This Criterion is not considered relevant to the proposal.

11.6.2 The proposal therefore aligns with Policy AW 5 of the RCT CBC LDP.

11.6.3 Policy AW 10 (*Environmental Protection and Public Health*) states that development proposals will not be permitted where they would cause or result in a risk of unacceptable harm to health and / or local amenity because of a range of factors unless it can be demonstrated that measures can be taken to overcome any significant adverse risk to public health. An assessment of the proposal against these factors is provided below:

1. Air pollution – The site is not located within an Air Quality Management Area (AQMA) and thus it would not affect an existing AQMA. Air pollution generated from construction will be managed through a Construction Environment Management Plan (CEMP) to be conditioned to any consent granted. Given that the proposal is for a renewable energy technology, it will positively affect air pollution in the long-term.
2. Noise pollution – This has been explained above but a Noise Impact Assessment accompanies this application which demonstrates that with appropriate acoustic fencing, noise levels are to an acceptable level.
3. Light pollution – The proposed development will not omit any light, it will only include lighting for emergency purposes.
4. Contamination – The proposed drainage strategy demonstrates that the proposed development will not result in contamination.
5. Landfill gas – It is not considered this is relevant to the proposal.
6. Land instability – It is not considered this is relevant to the proposal.

7. Water pollution – As per above, the proposed drainage strategy will ensure that there is no water pollution.
8. Flooding – As per above, the proposed drainage strategy will ensure no flooding risks.
9. Or any other identified risk to the environment, local amenity and public health or safety – It is not anticipated that there will be any other risk to the environment, local amenity and public health or safety.

11.6.4 As such, the proposal aligns with Policy AW 10 of the RCT CBC LDP.

11.7 Fire Safety

- 11.7.1 This application is supported by an Outline Battery Safety Management Plan (OBSMP) produced by Abbot Risk Consulting (ARC), which provides details of the safety management processes and procedures to be implemented to satisfy the prevailing safety requirements for the BESS system.
- 11.7.2 It is concluded that, as far as reasonably practicable and for the land West of Mount Road site, that currently foreseeable hazards associated with the equipment have been assessed and identified. These hazards are actively managed and added to as necessary and will be reported on at each Safety Working Group.
- 11.7.3 The OBSMP has been developed using existing knowledge of renewable and BESS capability and leans heavily on the subject matter expertise that ARC have in this technological domain. Installation of the BESS in accordance with OEM instructions followed by a period of qualification and testing will provide the supporting evidence. This will also allow for the consolidation of control evidence and enhanced development of mitigation to further reduce the level of risk posed.
- 11.7.4 The developer is committed to actively engaging and consulting with the local fire and rescue service to ensure compliance with National Fire Chiefs Council (NFCC).
- 11.7.5 It is therefore considered that any risks associated with fire safety will be appropriately managed and mitigated.

11.8 Arboricultural

- 11.8.1 This application is accompanied by a Tree Constraints Plan (TCP) and Arboricultural Impact Assessment (AIA). The AIA demonstrates that there will be no removal of trees or hedgerow on site and thus no impacts upon them. Where the cable is shown to impact the root protection areas of trees,

an alternative construction method through horizontal directional drilling will be utilised to avoid impacts to root protection areas.

11.9 Traffic

- 11.9.1 This application is supported by a Transport and Access Statement. The Statement explains that due to the nature of the proposals, the impact on the highway will be temporary, attributed to construction vehicle movements required during construction and decommissioning phases. During operation only a small number of vehicles will visit the site for servicing and maintenance purposes.
- 11.9.2 Access to the site will be obtained from Mount Road via an existing access. The site will also incorporate a looped road as well as suitable compounds and turning areas to allow construction vehicles to access and egress in a forward gear.
- 11.9.3 The site access has been demonstrated to accommodate up to 16.5m long articulated HGVs for the construction period. The site access is provided with suitable visibility and geometry in accordance with observed 85th percentile speeds.
- 11.9.4 The access arrangements are suitable and compliant with NFCC guidance on fire safety.
- 11.9.5 All vehicle movements would route to and from the site location from the north via Mount Road, Rhigos Road and the A465. Mount Road and Rhigos Road are both of sufficient width for a HGV to pass a car and there are no restrictions along these routes. The route to the A465 largely passes employment, industrial and agricultural uses and as such already accommodates HGV movements.
- 11.9.6 Appropriate traffic management and mitigation measures will be put in place to ensure that vehicle movements can be accommodated at the site access, on the highway and safely within the site itself. These measures will also minimise any impact from development traffic on noise, highway capacity, mud and dirt and air quality.
- 11.9.7 The report concludes that the proposed development complies with the following key policies and guidance in relation to transport and highways matters:
- Welsh Government - Future Wales
 - Welsh Government - Planning Policy Wales 12 (PPW12)
 - Welsh Government – Technical Advice Note 18 (TAN18)
 - CIHT - Manual for Streets 2 (MfS2)

- National Fire Chief's Council (NFCC) Guidance for Fire and Rescue Services in relation to BESS facilities

- 11.9.8 The proposals offer a choice of travel options, considering the type and rural location of the development, as well as promoting car sharing, and as such is in line with transport policies in Future Wales and PPW12.
- 11.9.9 The site access is safe and suitable in accordance with TAN18, MfS2 and the NFCC BESS guidance.
- 11.9.10 The development will not have a material impact on the operation of the surrounding highway network or an unacceptable impact on highway safety, in accordance with TAN18.
- 11.9.11 It is therefore considered that there are no reasons relating to transport or highways for objecting to the application.

12.0 Overall Conclusions

12.1 Summary of Planning Policy Requirements

- 12.1.1 National policy promotes increasing energy efficiency, minimising energy consumption and developing renewable energy sources. Local Policy supports development that promotes these objectives wherever any adverse impacts can be addressed satisfactorily.

12.2 Need for the Proposals

- 12.2.1 The Climate Change Act commits the UK (including Wales) government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050.
- 12.2.2 The Welsh Government has set its own legally binding targets under the Environment (Wales) Act 2016, which includes achieving net zero by 2050.
- 12.2.3 The former Climate Change Minister Julie James published the ‘*Summary of Response to the Consultation on Wales’ Renewable Energy Targets*’ and provided a Written Statement on 14th July 2023. Within that Statement, the Minister highlighted that the “*climate crisis and recent energy price surge has brought into sharp focus the need for a further step change in the Welsh Government’s ambitions*”. The Minister in their Statement adopted the target for Wales to meet the equivalent of **100% of its annual electricity consumption from renewable sources by 2035**.
- 12.2.4 There is an acute and growing need for this scheme to help tackle climate change, help replace closing fossil fuel power stations, meet a two-fold increase in electricity demand and transition to home-grown energy to improve energy security and stabilise fuel prices.

12.3 Benefits of the Proposals

Environmental Benefits

- 12.3.1 The proposed development aligns with RCT’s Tackling Climate Change Strategy by increasing local renewable energy generation. It will contribute to the goal of enhancing green energy production by 2030.
- 12.3.2 Renewable energy sources such as wind and solar face challenges due to the intermittent nature of their power generation. The grid often experiences an oversupply of energy during periods of high generation, leading to curtailment, where surplus power is wasted. The development will help address this issue by storing excess energy and releasing it during peak demand periods, reducing reliance on

fossil-fuel-based electricity generation.

- 12.3.3 The project optimises the use of renewable energy by preventing curtailment and ensuring that excess energy is not lost but instead redeployed when required. This could significantly reduce the need for non-renewable energy sources such as coal and gas, helping to cut carbon emissions.
- 12.3.4 By reducing dependence on fossil-fuel-based “Peaker Plants,” which operate at peak demand using natural gas or diesel, the project further limits greenhouse gas emissions.
- 12.3.5 Additionally, the proposed landscaping measures will not only screen the site but also enhance biodiversity, delivering a net ecological gain.

Economic Benefits

- 12.3.6 Energy curtailment is a costly issue, with approximately £806 million lost between 2020 and 2021 due to the inability to store excess power. The development will capture and store energy that would otherwise be wasted, providing a significant direct economic benefit.
- 12.3.7 Fluctuations in renewable energy supply impact electricity prices, often increasing reliance on expensive imported fossil fuels. By ensuring a more stable and predictable energy supply, the project will aim to help reduce price volatility, lower consumer energy bills, and mitigate fuel poverty.
- 12.3.8 The project will also aim to contribute to economic stability for local businesses by ensuring a reliable energy supply, reducing operational risks caused by energy shortages or price spikes.
- 12.3.9 Additional economic benefits will be realised through job creation and investment in the local economy during both the construction and operational phases. This includes employment in plant and equipment hire, hospitality, construction material supply, haulage, security, and long-term maintenance services.
- 12.3.10 As the UK transitions towards a more decentralised electricity network, the development will support the growing demand for electric vehicle charging and electric heating solutions, helping to avoid economic disruptions linked to energy supply constraints.

Social Benefits

- 12.3.11 The development will enhance energy security by reducing the UK's reliance on imported fossil fuels, helping to stabilise energy prices and ensure affordable access to electricity. By increasing local clean energy production, it aligns with national policies such as the *Clean Power Action Plan (2024)*, which

aims to protect consumers from global energy price fluctuations.

- 12.3.12 With growing concerns about power shortages, the project will provide additional energy storage capacity to support the local electricity network, helping to prevent blackouts and supply disruptions. It will also improve the National Grid's ability to manage electricity flow by providing critical services such as Voltage Regulation, Frequency Response, Inertia, and Blackstart capabilities.
- 12.3.13 A more resilient electricity network will benefit businesses and communities by ensuring continuity of services and reducing the economic and social disruptions caused by power outages. The ability to store and release electricity on demand will help safeguard the UK's energy future.

12.4 Summary of Impacts

- 12.4.1 The potential impacts that could arise from the proposed development have been identified within this statement. All of these factors have been assessed in detail using evidenced based assessments undertaken by experienced and qualified professionals. No significant impacts have been identified and where minor impacts are identified, these have been satisfactorily mitigated. In some cases, a net benefit is achieved for example a net gain to biodiversity.

12.5 Compliance with Planning Policy and Planning Balance

- 12.5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Act, the determination must be in accordance with the Development Plan, unless material considerations indicate otherwise.
- 12.5.2 The previous section of this statement has demonstrated that the proposed development is compliant with the Development Plan and all relevant National and Local Planning Policy.

12.6 Final Conclusions

- 12.6.1 Taking into account the above and the contents of this statement, it has been demonstrated that the proposed development is compliant with the Development Plan and therefore all local and national policy. The public benefits of the proposal should weigh substantially in favour of granting planning permission. The economic and biodiversity benefits should also attract moderate weight in favour of granting planning permission. In conclusion, the planning balance tilts overwhelmingly in favour of granting planning permission.



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