



Planning Design and Access Statement

DNS Reference: 3272424

Installation of a 25MWp solar farm and
associated infrastructure

Pen Caer Lan Farm, Seven Sisters,
Neath, SA10 9EP

Greentech Invest UK (8) Limited

April 2025



Document Title: Planning Design and Access Statement

Client: Greentech Invest UK (8) Limited

Job Number: LH23-27

Document Review:

Prepared by: Lewis Taylor

Signed:

Checked by: Steffan Baker

Signed:

Verified by: Nick Beddoe

Signed:



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	6
2.4	Public Rights of Way	7
2.5	Heritage and Archaeological Assets	8
2.6	Coal Mining Risk	8
2.7	Flood Risk	9
2.8	Agricultural Land Classification.....	11
2.9	Administrative Context.....	12
3.0	Site Selection	13
3.1	Overview	13
3.2	Macro Scale Site Search	13
3.3	Optimised Site Selection.....	14
3.4	Avoiding Best and Most Versatile Agricultural Land	17
3.5	Review of Previously Developed (Brownfield) Sites	17
3.6	Summary.....	19
4.0	Summary of Pre-Application Engagement.....	21
4.1	EIA Screening	21
4.2	Non-Statutory Engagement	21
4.3	Statutory Consultation.....	21
5.0	The Proposed Development	23
5.1	Summary of the Proposed Development.....	23
5.2	Solar Arrays	24
5.3	Associated Infrastructure	26
5.4	Environmental Enhancements	28
5.5	Site Access	29



5.6	Period of Generation	29
6.0	Relevant Planning History	30
6.1	The Site	30
6.2	The Surrounding Area.....	30
7.0	The Need for the Development.....	32
7.1	Transition to Net Zero	32
7.2	Increase in Electricity Demand	33
7.3	Decline of centralised fossil fuel power stations and decarbonise the grid	33
7.4	Energy Security Strategy	34
7.5	Clean Power 2030 Action Plan: A new era of clean electricity (December 2024)	34
7.6	Declaration of Climate Emergency	34
7.7	National Policy	35
7.8	Conclusions on Need.....	35
8.0	Implications for Food Production	37
8.1	Impact of Climate Change on Agriculture	37
8.2	Planning Policy	37
8.3	Land Use in the UK.....	38
8.4	Roof top solar.....	38
8.5	Agricultural Land Quality	39
8.6	Co-Location of Agriculture	39
8.7	Conclusions on Implications on Food Production.....	40
9.0	Benefits of the Proposed Development	41
9.1	Environmental Benefits	41
9.2	Economic Benefits	42
9.3	Social Benefits	44
9.4	Weight to be Given to the Benefits in the Planning Balance	45
10.0	Summary of Community Consultation	46
10.1	Engagement with the Community Council.....	46
10.2	Community Consultation	46
11.0	Planning Policy Context.....	47
11.1	Legislative Context.....	47



11.2	National Development Framework – Future Wales 2040	47
11.3	Planning Policy Wales (Edition 12, 2024)	50
11.4	Neath Port Talbot County Borough Council Local Development Plan	52
11.5	National Policy Statements	59
11.6	Other Material Considerations	61
11.7	Summary	64
12.0	Planning Assessment	65
12.1	Assessment of the Principle of Development on the Proposed Site	65
13.0	Assessment of Environmental Impacts	71
13.1	Overview	71
13.2	Landscape and Visual	71
13.3	Ecology	72
13.4	Cultural Heritage	73
13.5	Flood Risk and Drainage	73
13.6	Traffic and Transport	74
13.7	Glint and Glare	74
13.8	Noise	74
14.0	Overall Conclusions	75
14.1	Summary of Planning Policy Requirements	75
14.2	Need for the Proposals	75
14.3	Benefits of the Proposals	75
14.4	Summary of Impacts	76
14.5	Compliance with Planning Policy and Planning Balance	76
14.6	Final Conclusions	77



1.0 Executive Summary

- 1.1.1 This Planning Statement has been prepared on behalf of Greentech Invest UK (8) Limited in support of a planning application for solar farm development on land Pen Caer Lan Farm, Seven Sisters, Neath, SA10 9EP.
- 1.1.2 The site area measures 29 hectares. It lies predominantly within agricultural fields separated by a watercourse and hedgerows to the south west of Seven Sisters, Neath.
- 1.1.3 The application proposes a renewable energy generating station comprising ground mounted solar panels with an installed generating capacity of up to 25MWp, including permanent grid connection hub, mounting framework, inverters, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net benefit and environmental enhancements for a temporary period of 40 years.
- 1.1.4 The UK's last coal fired power station ceased generation in September 2024, highlighting the urgent need for additional power generation to replace the lost supply. This need is amplified by the projected doubling of electricity consumption by 2050 due to electrification of cars and heating systems. Consequently, there is an urgent need to transition to clean, renewable energy to meet this need and achieve national net zero targets. Solar farms are a proven source of safe, locally produced and cost-effective energy that are relatively quick to deploy and are therefore ideally placed to help address the huge and growing demand for electricity, replace closing power stations, tackle climate change and deliver home-grown secure energy which isn't subject to volatile foreign market fluctuations.
- 1.1.5 The proposals would have the capacity to generate approximately 25MWp of electricity which would offset around 11,000 tonnes of CO2 per annum and 440,000 tonnes over the lifetime of the scheme. This equates to enough electricity to serve the total power needs of around 7,500 average UK households per annum. The economic benefits of the scheme include economic output of £500,000 GVA over 14 months, £80,000 business rates generated per annum to the Council, and significant spin off benefits for the supply chain with gross value added (GVA) far in excess of £1million.
- 1.1.6 The proposed scheme would provide a significant contribution towards decentralised electricity production in the area and support the transition to electric vehicles and heating. It would also help to



reduce Wales's reliance on imported fossil fuels and help gain more control over its energy provision and energy security.

- 1.1.7 The scheme has been sited and designed to avoid harmful impacts on the character and appearance of the area. Key to this is the siting of the development which has been strategically positioned to avoid the Coal Development High Risk Areas and is sufficiently distanced from the Seven Sisters village. The proposals are supplemented by a well-designed landscaping scheme which provides extensive species rich planting and tree planting which provides structural landscaping and delivers a net gain in biodiversity.
- 1.1.8 The site falls within Neath Porth Talbot County Borough Council (CBC) area. As such, Policies contained within Neath Port Talbot County Borough Council Local Development Plan 2011-2026 (January 2016) are of relevance to the proposal.
- 1.1.9 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.
- 1.1.10 In this context, Future Wales: The National Plan 2040 represents the National Development Framework for Wales and should be read alongside Planning Policy Wales: Edition 12.
- 1.1.11 There is currently no Strategic Development Plan covering the site area.
- 1.1.12 The proposals have been assessed against the relevant 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 approximately 1.1km to south west of the centre of Seven Sisters, Neath Port Talbot. The aerial plan below shows the context of the site in relation to features of the surrounding landscape.



Figure 1 Aerial image of site with approximate site area overlaid

2.2 Site Description

- 2.2.1 The site measures 29ha (excl. access track), is irregular in shape and comprises a watercourse which flows from north west to south east and fields used for grazing sheep. The application site and surrounding areas are rural in nature, characterised by villages and towns in the valleys, typically wooded valley sides above which is grazing land. Farm buildings are dispersed throughout the landscape.

2.2.2 To the north and west of the site are agricultural fields, with the general topography sloping from north west to south east. To the south and east is the Seven Sisters Village, which is located 1.1km to the north-east of the application site at its centre.



Figure 2 View of site facing south-westwards



Figure 3 View of site facing north-westwards and showing Seven Sisters in the foreground



Figure 4 View of site facing north-westwards

2.2.3 The site is well enclosed by the surrounding topography and to a large extent by dense hedgerows which form the field boundaries. These provide a good level of visual screening of the site from public vantage points.

2.2.4 The site has a predominantly rural character but this character is disrupted by the presence of the overhead power lines beyond the northern border of the site.

2.3 Planning Policy Designations

2.3.1 The site is not subject to any significant planning designations which include National Landscapes (formerly Area of Outstanding Natural Beauty), National Park, Site of Special Scientific Interest (SSSI) Special Area of Conservation (SAC) or Special Protection Area (SPA). It is also located on the southward slope of the valley meaning that it cannot be viewed from the Brecon Beacons National Park.

2.3.2 Most of the site falls within the Dulais Valley Special Landscape Area which is shown below:

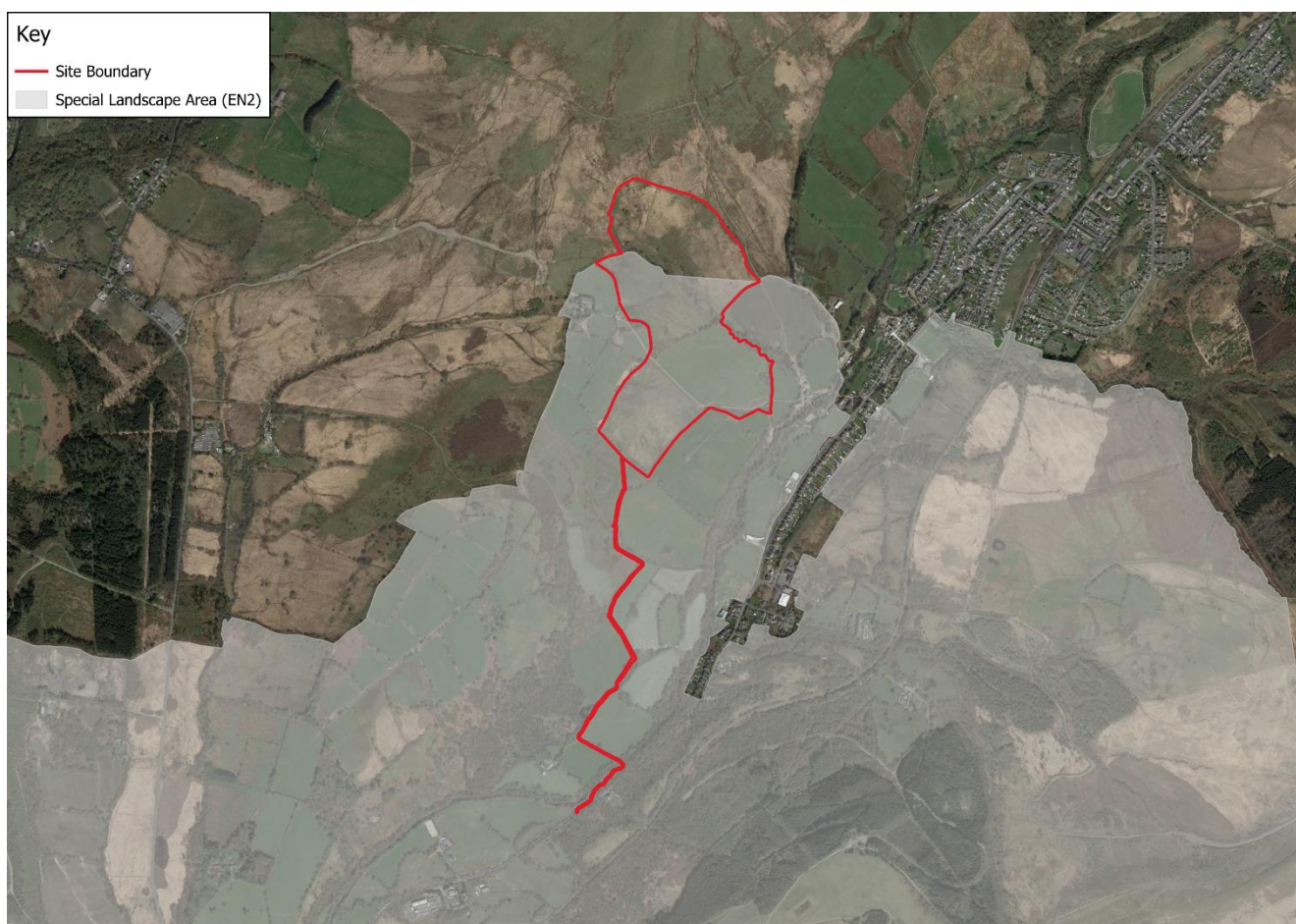


Figure 5 Plan illustrating special landscape area with approximate site location overlaid

2.4 Public Rights of Way

- 2.4.1 A Public Right of Way (PROW) runs across the application site. The access route leading to the site is defined as Public Right of Way (PROW) footpath named Route 20.DHi/2 which can be accessed off the A4109 to the south west of the application site.
- 2.4.2 This footpath splits into two footpaths named Route 23.D.Hi/1 and 23.D.Hi/2, which run throughout the application site and separate to various footpaths extending further across the site. The footpaths however are not well established and do not appear to be well used.



Figure 6 Neath Port Talbot PROW with approximate site location overlayed

2.5 Heritage and Archaeological Assets

- 2.5.1 There are no designated or non-designated heritage assets within or adjoining the site. The nearest designated asset is located 518 metres to the north-east of the site at its nearest point. This is a grade II listed circular pigsty at Blaendulais Farm.

2.6 Coal Mining Risk

- 2.6.1 A small portion of the site falls within the coal mining development high risk area owing to the presence of disused mine entries. However, the accompanying Coal Mining Risk Assessment confirms that there is no significant recognised risk to the proposed development resulting from the solid geology of the area.

2.7 Flood Risk

Pen Caer Lan Solar Farm

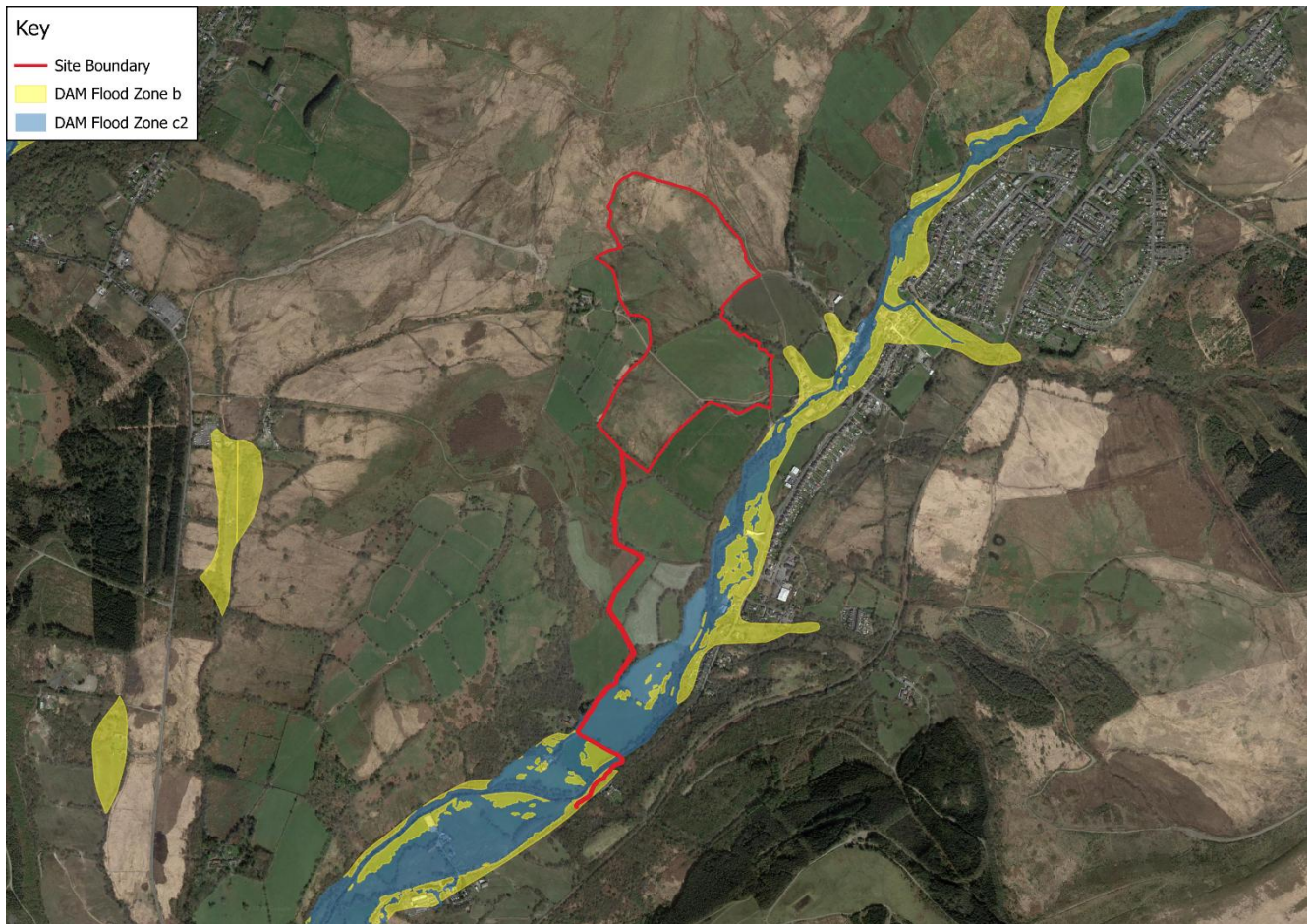


Figure 8 Development Advice Map (DAM) illustrating flood zones with site location overlayed

- 2.7.2 Whilst the Flood Map for Planning has no official status until the Welsh Government implements the revised TAN15, it represents the best available information on flood risk and Natural Resources Wales continue to use this to inform their planning advice.
- 2.7.3 The development site is shown to be outside of the Flood Zone. However, as per the Development Advice Map, the access does extend into Flood Zones 2 and 3 of Rivers and Sea Flood Zones as shown on the image below:



Figure 9 Flood map for planning illustrating flood zones with approximate site location overlayed

2.7.4 The proposed development has been fully assessed through a Flood Consequences Assessment (FCA) which concludes that the development can be constructed and operated safely and without exacerbating any risk of flooding elsewhere.

2.7.5 Notably, the solar arrays would maintain a small gap between each panel so as to fragment the combined runoff during rainfall, therefore preventing sheet runoff. Access would be created by permeable Type 1 stone tracks which also prevent surface water runoff. As such, the development would effectively maintain a greenfield response.

2.8 Agricultural Land Classification

2.8.1 The available climatic, soil and fieldwork information indicates that the site is likely to be no better than ALC Sub-grade 4.

2.8.2 This confirms that the site does not comprise Best and Most Versatile (BMV) land, and that the



proposals are therefore in accordance with Planning Policy set out in the NDF.

2.9 Administrative Context

- 2.9.1 The site sits wholly within the Neath Port Talbot CBC administrative area.
- 2.9.2 The main solar farm element of site is located within the Seven Sisters Community Council while the access is located within the Crynant Community Council area.



3.0 Site Selection

3.1 Overview

- 3.1.1 The proposal requires a large site area to accommodate the quantum of solar arrays necessary to make full use of the agreed grid capacity and to make the grid connection financially viable at a time when subsidies are no longer available for solar farms.
- 3.1.2 The proposal must be located close to an agreed point of connection; 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.
- 3.1.3 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.

3.2 Macro Scale Site Search

- 3.2.1 The proposal represents 'major development' and as such should be located outside of important environmental designations such as National Parks, AONBs and other, locally significant landscape designations.
- 3.2.2 The image 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.

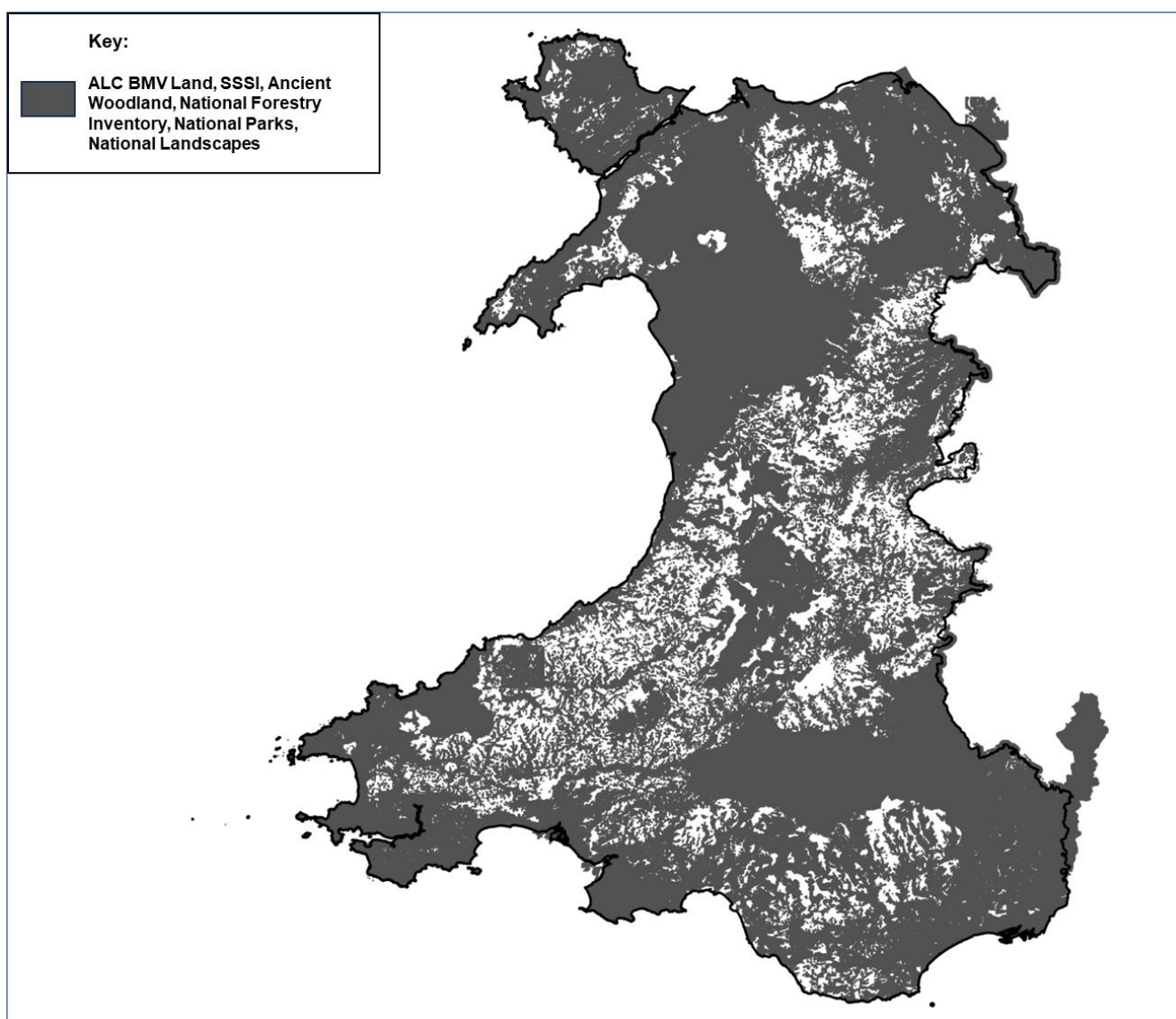


Figure 10 Macro (National) Scale Planning Constraints Map

3.3 Optimised Site Selection

3.3.1 Once an available Grid Connection opportunity is identified, the site selection process is then refined to identify the most suitable site within viable proximity to the agreed point of connection. This exercise takes account of various factors such as grid connection costs, anticipated scheme yield, and landowner agreements. The search covered an area of approximately 3km from the point of connection, which is considered to be the maximum distance from the grid connection point within which the scheme can remain commercially viable.

3.3.2 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 with a relatively high level of solar irradiation
- Compatible neighbouring uses
- Previously developed land;
- Landscape and visual considerations;
- Site specific allocation;
- Agricultural Land Classification;
- Site orientation and size (capability of accommodating 25MWp of solar panels);
- Deliverability and accessibility of the site
- Viability

3.3.3 These are explained through the table below with reference to the proposed site location:

Table 1 Site Selection Criteria within the defined search area

Siting Consideration	Amplification
A location with a relatively high level of solar irradiation	At the wider scale, areas in South Wales generally benefit from higher levels of solar irradiation. Within the search area the search is then directed towards sites which avoid north-facing topography and locations where there is significant overshadowing from vertical infrastructure, buildings or trees which cannot be avoided. For this reason, larger fields are generally favoured so that appropriate distances can be observed from any such features.
Compatible neighbouring uses	Sites near residential development can be problematic and usually retain a buffer. Similarly, there are usually buffers from other types of development such as airports to avoid potential impacts like glint and glare. The application site is located away from residential dwellings and is wholly compatible with



neighbouring land uses.

Previously developed land	Re-using previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside (agricultural land) and undeveloped greenfield land that needs to be used. It should be noted that whilst brownfield land might be ideal in some specific cases, the solar industry finds it hard to compete on land rental values compared to other forms of development such as residential or commercial. Furthermore, identifying a brownfield site of an adequate scale can also prove to be very challenging. In this instance there are no brownfield sites within the search area which are large enough to accommodate the proposed scheme.
Landscape and visual considerations	Due to the scale of development a location where it can be accommodated without unacceptable impacts on the landscape. The identification of sensitive receptors and other features within the landscape is also highly important. For this reason, the search takes account of the relative proximity of National Landscapes and National Parks as well as key features of the Historic Environment including listed buildings and registered parks and gardens in order to minimise prospective impacts brought about by a change in the character of the landscape.
A site of suitable size, and orientation that can accommodate the proposed development	The site must be of a certain scale to accommodate the installed capacity of the project. Importantly where potential sites contain physical obstructions that cannot be removed (such as buildings woodland, rivers, streams, highways etc.) the site area requirements can be significantly increased. Additionally, a site positioned on a north-facing slope would require a greater development footprint.



A suitable site that is available for the duration of the solar development's operational life	The site must be available for the duration of the proposed operational period. This gives certainty that the scheme can be delivered. Site availability is determined by the willingness of the landowner to enter into an option agreement and in this instance the proposal is for an operational period of 40 years.
Site specific allocation	Consideration should be given to any related allocations presented through the adopted Local Development Plan. In this instance, no specific site has been allocated for renewable energy developments by the Local Planning Authority.
Avoiding 'Best and Most Versatile' agricultural land	Planning Policy Wales requires that the proposed use of any agricultural land must be shown to be necessary and that poorer quality land has been used in preference to higher quality land. It also encourages the continued agricultural use of the site and biodiversity improvements around the arrays. The intention of this policy is to ensure limit any reductions in agricultural output resulting from new development. In this instance the site avoids BMV land entirely.
Viability	The development must be viable having regard to the cost of land rent, grid connection and construction costs.

3.4 Avoiding Best and Most Versatile Agricultural Land

- 3.4.1 Through careful site selection and configuration, the applicant has avoided the use of Best and Most Versatile (BMV) land.
- 3.4.2 The available climatic, soil and fieldwork information indicates that the site is likely to be no better than ALC Sub-grade 4 with most of it comprising Grade 5.
- 3.4.3 This confirms that the site does not comprise Best and Most Versatile (BMV) land, in accordance with Planning Policy.

3.5 Review of Previously Developed (Brownfield) Sites

Grid Connection

- 3.5.1 A primary challenge to Solar farm development lies in achieving a viable Grid Connection. As the distance from the grid increases there are increased costs associated with cabling and potential third-



party land agreements.

Availability of Previously Developed Land

- 3.5.2 Unlike Local Authorities in England, Local Authorities in Wales are not required to maintain and publish brownfield registers.
- 3.5.3 Notwithstanding, a search has been made for a previously developed site that meets the basic criteria of the requirements of a solar farm, which are:
- Available for long term lease (40 years) in the range of £500 to £1200 per acre with no remediation required
 - Land area of 29 hectares or more
 - Located within 3km of the grid connection point
- 3.5.4 There are no sites within 3km of the grid connection point, which are available for long-term lease and are large enough to accommodate such a scheme.
- 3.5.5 Additionally, previously developed land is almost always unviable for solar farm use, particularly where it has alternative development potential. As solar farm will usually generate a ground rent of between £500 and £1,200 per acre for the landowner, while residential land typically generates between £350,000 per acre for low value areas and £1,000,000 per acre for higher value areas. Employment development will usually generate between £125,000 for low value office or industrial space, £175,000 per acre for average industrial land and up to £1,500,000 per acre for retail. A table setting out benchmark figures used for the preparation of Community Infrastructure Levies (prepared by GVA) is contained in Appendix A. Where there is alternative development potential that could offer a landowner a higher return, the landowner is highly unlikely to make the land available for a solar farm when it will offer a fraction of the return from alternative uses that are usually feasible on previously developed sites.
- 3.5.6 In addition, previously developed land is often allocated for alternative development such as residential or employment use; as such a renewable energy scheme would be contrary to planning policy on the site.

3.5.7 In this case, no such sites that come close to the size required have been identified. Furthermore, the Council does not allocate land for renewable energy.

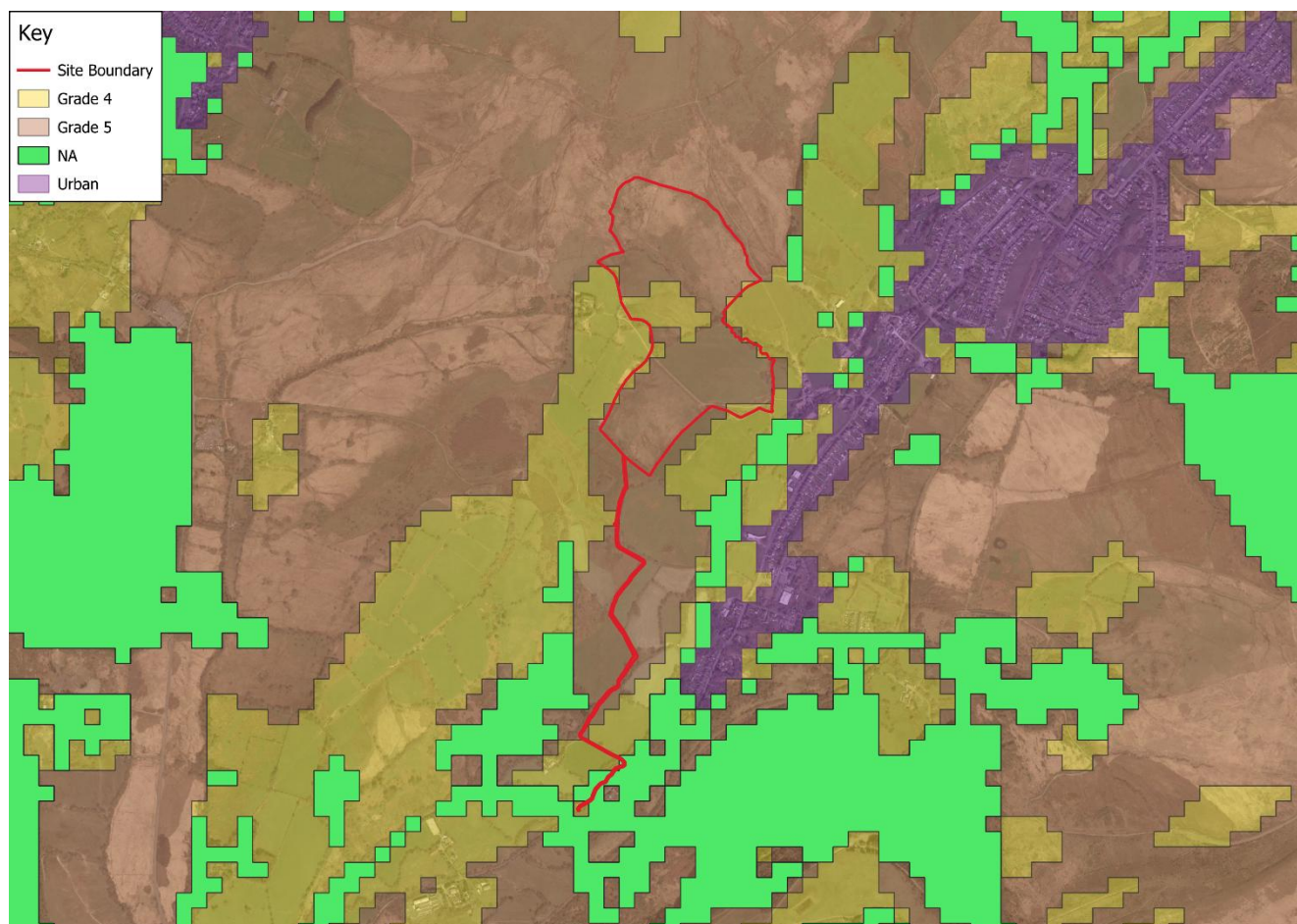


Figure 11 Verified site specific agricultural land classification survey

3.6 Summary

3.6.1 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 well distanced from nearby Historic Environment features.
7. Is situated away from nearby residential properties or other potentially incompatible neighbouring land uses.
8. Sits outside of Flood Zones 2 & 3 (besides the site access)
9. Benefits from relatively high levels of solar irradiation, being located in the south of the UK and not overshadowed.
10. Utilises existing grid infrastructure.



4.0 Summary of Pre-Application Engagement

4.1 EIA Screening

4.1.1 This development was submitted to the Planning and Environment Decisions Wales (PEDW) for a Screening Opinion under the Environmental Impact Assessment (EIA) (Wales) Regulations 2017 under reference DNS 3272424 on the 21st of September 2021. PEDW responded to the request (full response included at Appendix B) and confirmed that the proposed development does not require EIA. This process confirms that the development is not considered likely to give rise to significant environmental effects.

4.2 Non-Statutory Engagement

4.2.1 A range of non-statutory engagement has taken place before statutory consultation. These are covered in full detail within the submitted Consultation Report prepared by Thirty47 and are summarised below:

- Engagement with the Community Council
- Presentation with the Community Council
- Briefing notes sent to Elected Members of the Local Council

4.3 Statutory Consultation

4.3.1 Prior to submitting a full DNS application, the developer must publicise and consult on the proposed application for at least 6 weeks.

4.3.2 A summary of the activities to be undertaken are as follows:

- Application and supporting documents published on a website (minimum 42 days)
- Write to relevant specialist and community consultees
- Written notification to owners / occupiers of land adjacent to site
- Notice published in local newspaper
- Site notice displayed on or near site (minimum 42 days)



- 4.3.3 Feedback received during this consultation period will be consolidated within a Pre-Application Consultation (PAC) Report, which will accompany the DNS submission.

5.0 The Proposed Development

5.1 Summary of the Proposed Development

- 5.1.1 The applications seeks consent for the installation of a solar farm comprising ground mounted solar PV panels with a generating capacity of up to 25MWp, including permanent grid connection hub, mounting framework, inverters, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net benefit and environmental enhancements for a temporary period of 40 years.
- 5.1.2 The development requires a site of around 29 hectares and is formed from a contiguous block of land.
- 5.1.3 The proposal is temporary and fully reversible. Once the planning permission has expired the proposals would be removed from the site and it would be returned to its current condition, with a legacy of environmental enhancements.
- 5.1.4 The proposed site layout plan is shown below:

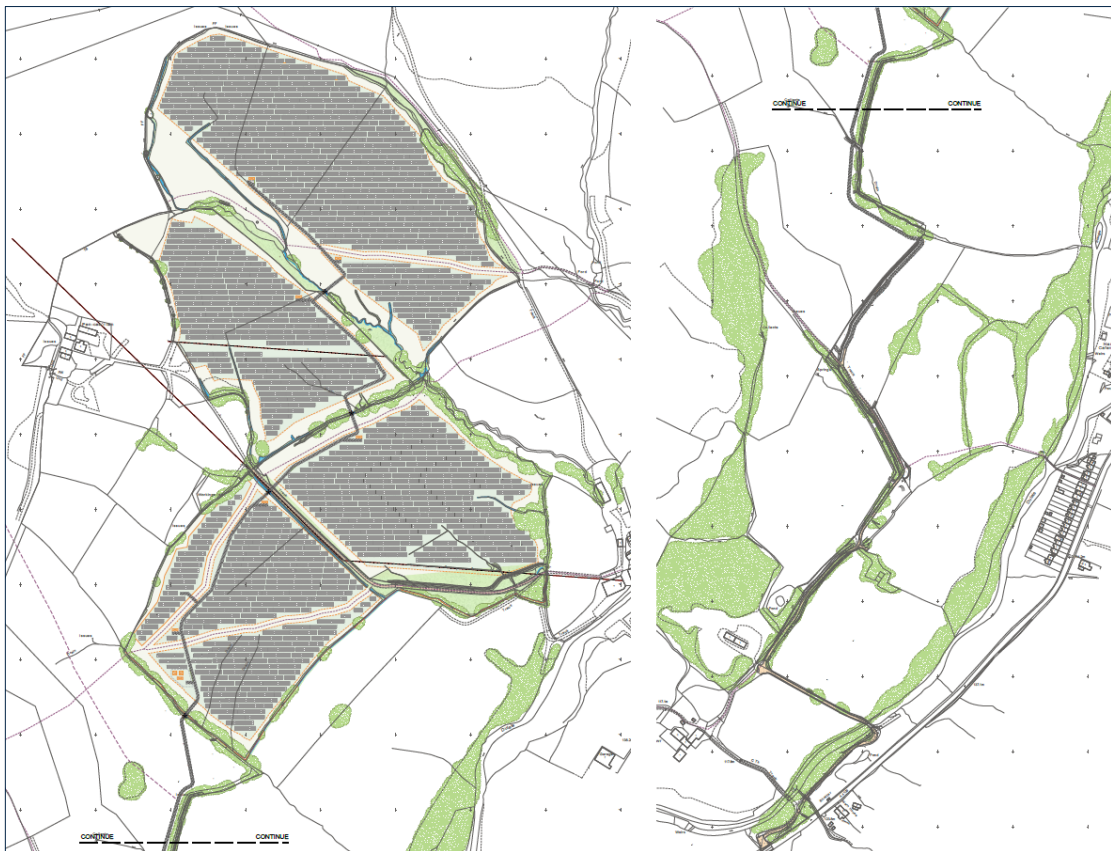


Figure 12 Proposed Site Layout Plan

5.2 Solar Arrays

5.2.1 The solar arrays would be set out in rows and mounted on a framework system which is either screwed or driven into the ground. The solar panels are entirely inert and once established on site, there would be minimal disturbance. The panels will be static (non-rotating) and the ground could also be grazed by sheep, thus preserving an agricultural function and generating an additional agricultural yield. The solar panels will be spaced to avoid shadow and elevated on an angled frame supported by stakes. The arrays will be positioned along an east-west axis with the panels facing south to achieve optimum exposure for solar energy absorption.



Figure 13 Photograph of an example ground mounted solar array in South Wales

5.2.2 The arrays are fixed to a framework system which is pushed into the ground (there are no concrete foundations).



Figure 14 Photograph showing the arrays with standard gaps between panels to allow rainwater to flow through and disperse the run off.



Figure 15 Photograph showing the framework system prior to bolting on the panels.

5.3 Associated Infrastructure

5.3.1 The scheme would also incorporate the following ancillary elements:

- Stock-proof fencing – agricultural in nature, screened by existing trees and hedges and additional planting and will allow for the passage of small mammals.
- CCTV around the perimeter of the site.
- A stone track running through the site.
- Underground cables.
- Inverter Units.
- A customer sub-station and associated small scale plant.
- A range of ecological enhancement measures.



Figure 16 Photograph showing the typical specification of a stock proof security fence and security cameras

5.3.2 The security cameras are operated remotely and activated by motion. They would be located at intervals around the perimeter of the site and directed to the interior of the site. There would be no security lights.

5.3.3 Stone tracks would be used to enable small maintenance vans to move through the site. These tracks are easily reversible and fully permeable.

- 5.3.4 Cabling is run through a conduit at the back of the panels and a cable from the inverter would be feed to underground to the transformer within the site.
- 5.3.5 Inverter units would convert the variable direct current (DC) output of a photovoltaic (PV) solar panel into a utility frequency alternating current (AC) that can be fed into a commercial electrical grid or used by a local, off-grid electrical network. They are sited underneath the panels at the end of the row.



Figure 17 Photograph of inverters at the end of the 'string' of panels

- 5.3.6 It is also proposed to include a small permanent DNO substation in the south west area of the site. The proposed elevations are shown below:

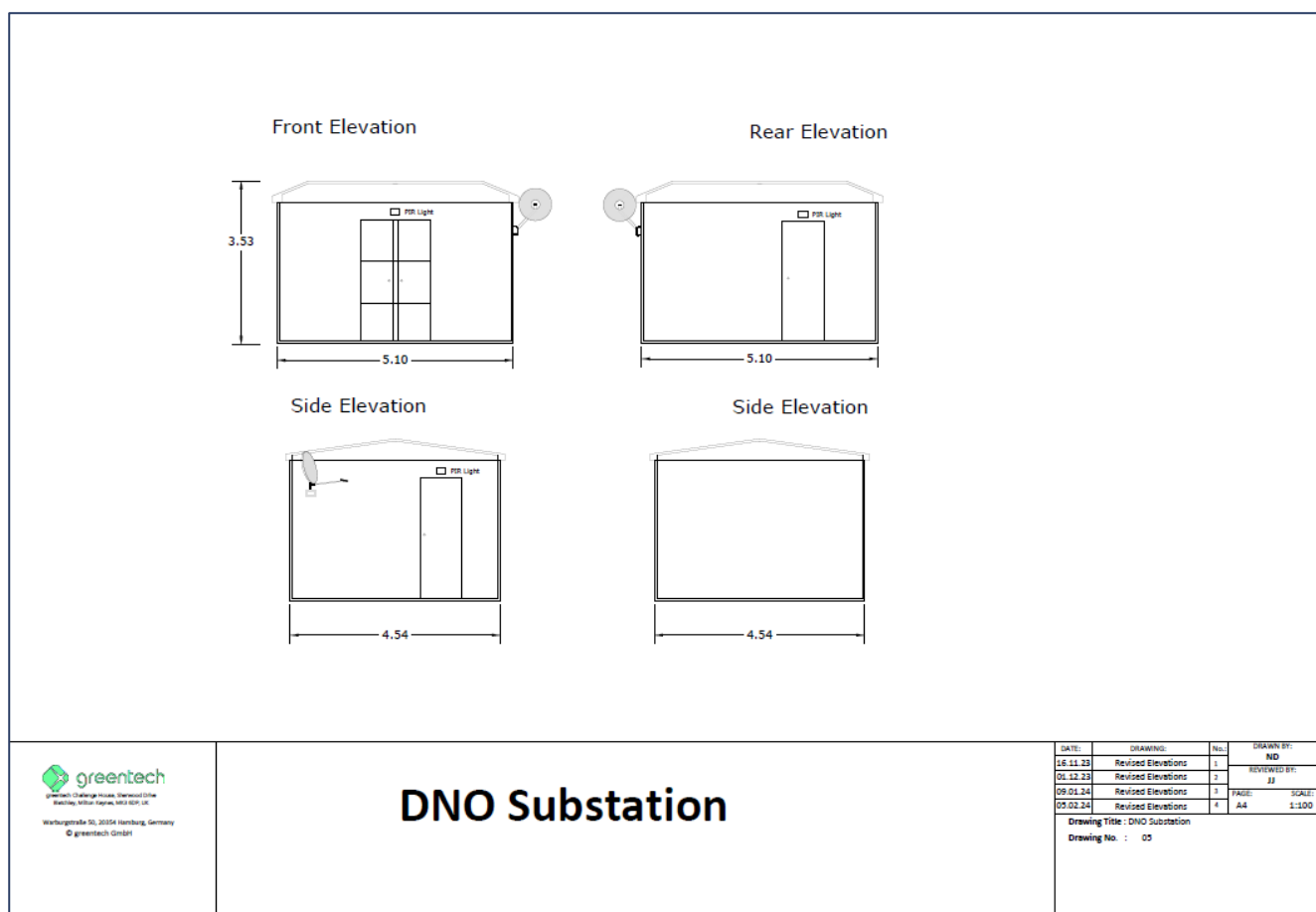


Figure 18 Proposed elevations of DNO substation

5.4 Environmental Enhancements

5.4.1 The proposals have been carefully sited and designed to work with the existing landscape to deliver key benefits in reducing the visual impacts of the proposals and providing ecological benefits above baseline condition and thus providing a biodiversity net benefit.

5.4.2 It is proposed to enhance/create the following habitats:

- Native tree, hedgerow and shrub planting;
- Bird boxes;
- Bat boxes;
- Hibernacula;



- Otterholt;

5.5 Site Access

- 5.5.1 Site access is proposed via an existing point of access from Dulais Road (A4019).
- 5.5.2 A Transport Assessment has been undertaken as well as a Construction Traffic Management Plan (CTMP). This report explains the proposed vehicular access arrangements for the scheme and outlines the proposed approach to mitigating any impacts caused through the construction stage.
- 5.5.3 The report includes a tracking assessment which confirms that all delivery vehicles can access the site and complete the crossing over the bridge, safely.
- 5.5.4 It also includes the number of vehicle movements and confirms there will be no significant impacts on the highway network.

5.6 Period of Generation

- 5.6.1 The proposal will be temporary for 40 years. Full decommissioning of the development would be secured via a planning condition with details to be agreed prior to the cessation of energy generation. 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.
- 5.6.2 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 Relevant Planning History

6.1 The Site

6.1.1 A review of the planning history of the site showed that the site had been subject to the following planning applications in connection with Pen Caer Lan Farmhouse:

Table 2 Planning history

Planning Reference	Location	Application Description	Decision
P2017/0906	Pen Caer Lan Farm Lane from Dulais Road to Pen Caer Lan Farm, Seven Sisters, Neath, SA10 9EP	Retention and completion of two storey rear extension	Granted 25/09/2017
AGRI/2014/0091	Pen Caer Lan Farm Lane from Dulais Road to Pen Caer Lan Farm, Seven Sisters, Neath, SA10 9EP	Agri: Creation of a new road over old access track	Granted 03/10/2014
P2014/0684	Pen Caer Lan Farm Lane from Dulais Road to Pen Caer Lan Farm, Seven Sisters, Neath, SA10 9EP	Single storey rear extension.	Granted 11/07/2014

6.2 The Surrounding Area

6.2.1 A review of the planning history of the surrounding area showed that similar proposals for solar developments had been consented or are under consideration. Of relevance are the planning applications below:



Table 3 Relevant planning history of surrounding area

Planning Reference	Location	Application Description	Decision
DNS CAS-02084-T4Z8W4 - Hirfynydd Renewable Energy Park	Land to the East of Crynant, Neath Port Talbot	Renewable energy park comprising wind generating capacity, solar photovoltaic generating capacity, and battery storage	Under consideration



7.0 The Need for the Development

7.1 Transition to Net Zero

7.1.1 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.

7.1.2 The Welsh Government has set its own legally binding targets under the Environment (Wales) Act 2016, which includes achieving net zero by 2050.

7.1.3 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**.

7.1.4 The environmental impact of climate change is also linked to significant damage to the UK economy. However, combined, 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). Addressing climate change will protect and benefit the UK economy as well.

7.1.5 HM Government’s Net Zero Strategy: Build back greener (2021) confirms:

“By 2035 the UK will be powered entirely by clean electricity, subject to security of supply.”

“A low-cost, net zero consistent electricity system is most likely to be composed predominantly of wind and solar generation”

“The net zero economy will be underpinned by cheap clean electricity, made in Britain. A clean, reliable power system is the foundation of a productive net zero economy as we electrify other sectors – so we will fully decarbonise our power system by 2035”

7.2 Increase in Electricity Demand

- 7.2.1 The UK's electricity demand is predicted to double to double by 2050¹ due to demographic change and increased electrification including widespread use of heat pumps and electric cars.
- 7.2.2 Solar farms play a crucial role in meeting the National Grid's renewable energy needs, providing green electricity and reducing reliance on fossil fuels. Solar technology is a safe, locally produced, and sustainable source, without the need for tax subsidies.



Figure 19 Electric car charger and heat pump driving electricity demand which is set to double by 2050

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

- 7.3.1 Seven nuclear power stations have been decommissioned in recent years, and all 14 UK coal-fired power stations closed as of September 2024. The urgent need for clean renewable generators to reduce carbon emissions is a pressing issue with the escalating climate and ecological crisis, there is an unprecedented need for electricity to be provided urgently through clean renewable generators that don't emit carbon and can support biodiversity.
- 7.3.2 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

¹ National Grid Briefing: <https://www.nationalgrid.com/stories/energy-explained/how-will-our-electricity-supply-change-future>



replace these generators but also to double electricity generation due to demand.

7.4 Energy Security Strategy

7.4.1 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.

7.4.2 Having regard to Solar, the Plan states *"The UK has huge deployment potential for solar power and we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035."* This amounts to a fivefold increase on current installed capacity. The Plan proceeds to state *"We need to maximise deployment of both types of solar to achieve our overall target"*. The plan recognises that ground-mounted solar is *"one of the cheapest forms of electricity generation and is readily deployable at scale"*.

7.5 Clean Power 2030 Action Plan: A new era of clean electricity (December 2024)

7.5.1 Clean Power 2030 was released in December 2024. It aims to tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers and the need to reduce greenhouse gas emissions and limit the damaging effects of climate change.

7.5.2 The Plan requires rapid deployment of new clean energy capacity across the whole of the UK and reflects the shared renewable ambitions of the UK, Scottish and Welsh Governments.

7.5.3 The Plan sets ambitious targets, which include 45-47 GW for solar.

7.5.4 Delivering Clean Power 2030 paves the way to decarbonising the wider economy by 2050 through the pursuit of electrification of heat in buildings, transport and industry. As a result of this electrification, electricity demand is likely to at least double.

7.6 Declaration of Climate Emergency

7.6.1 Neath Port Talbot CBC declared a climate emergency on September 28th 2022, making a commitment to reduce their carbon reduction by 37% in 2025 and net zero by 2050.



7.6.2 Consequently, the council have agreed towards a DARE (Decarbonisation and Renewable Energy) strategy which outlines its commitment to the climate emergency and how it intends to transform to become a net zero organisation. The plan was formally adopted by the council in May 2020.

7.7 National Policy

7.7.1 Future Wales 2040 is the National Development Framework (NDF) for Wales. It states at Policy 17 (*Renewable and Low Carbon Energy and Associated Infrastructure*) “*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***” (own emphasis).

7.8 Conclusions on Need

7.8.1 The Climate Change Act commits the UK government to reaching net zero by 2050. HM Government’s Net Zero Strategy confirms that by 2035, the UK will be powered entirely by clean electricity, composed predominantly of wind and solar generation.

7.8.2 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.

7.8.3 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.

7.8.4 HM Government’s Powering Up Britain: Energy Security Plan aims to make the UK more energy independent, secure and resilient. The Plan builds on the British Energy Security Strategy and Net Zero Strategy, focusing on transitioning to abundant, low-carbon energy. The Plan aims for 70 gigawatts of ground and rooftop solar capacity together by 2035, a fivefold increase on current installed capacity. The Plan recognises ground-mounted solar as a cost-effective and easily deployable form of electricity generation.

7.8.5 Clear Power 2030 aims to tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers and the need to reduce greenhouse gas emissions and limit the damaging effects of climate change. The Plan requires



rapid deployment of new clean energy capacity across the whole of the UK and reflects the shared renewable ambitions of the UK, Scottish and Welsh Governments. The Plan sets ambitious targets, which include 45-47 GW for solar.

- 7.8.6 Neath Port Talbot CBC declared a climate emergency on September 28th 2022, making a commitment to reduce their carbon reduction by 37% in 2025 and net zero by 2050. Consequently, the council have agreed towards a DARE (Decarbonisation and Renewable Energy) strategy which outlines its commitment to the climate emergency and how it intends to transform to become a net zero organisation. The plan was formally adopted by the council in May 2020.
- 7.8.7 Considering all of the above, it is clear that there is a demonstrable need for solar development and the proposed development will contribute to this need. Significant weight ought to be given to the benefits of generating renewable energy in the context of this unprecedented need.



8.0 Implications for Food Production

8.1 Impact of Climate Change on Agriculture

- 8.1.1 The London School of Economics (LSE) has released data indicating severe climate change impacts on the UK, including agriculture, livestock, fisheries, drought, flooding, and coastal impacts.²
- 8.1.2 It confirms that *“Agriculture is one of the UK sectors expected to be most impacted by climate change. The reduction of arable land as regions become drier is projected to halve its total contribution to UK GDP by 2100.”*
- 8.1.3 Renewable energy generation, even on farmland, can help reduce the adverse impact on agriculture. Failure to deliver renewable energy will result in a 50% reduction in agricultural yield.
- 8.1.4 Setting aside a small area of UK land for decentralised renewable energy will help safeguard agriculture by warding off the worst effects of climate change that could damage farming in the future if left unaddressed.

8.2 Planning Policy

- 8.2.1 In the first instance, Planning Policy dictates that previously developed land, brownfield, contaminated land, industrial land or Agricultural Land Classification (ALC) Grades 3b, 4 or 5 should be used. This will ensure the avoidance of the best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a) as per the requirements of the Planning Policy Wales.
- 8.2.2 Planning Policy Wales states that BMV land should be conserved as a *“finite resource for the future”* and *“considerable weight should be given to protecting such land from development because of its special importance”*. It states that land in Grades 1, 2 and 3a should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation, which outweighs the agricultural considerations.

² <https://www.lse.ac.uk/granthaminstitute/wp-content/uploads/2022/05/What-will-climate-change-cost-the-UK-risks-impacts-mitigation-1.pdf>

8.3 Land Use in the UK

8.3.1 The UK needs to balance land use between food production and energy production. Solar farms currently take up 0.06% of land, compared to 1.41% for golf courses and parks. Should government plan to increase solar land use to be in line with net-zero targets, this would still just account for 0.3% of land area. This is equivalent to around 0.5% of the land currently used for farming and roughly half of the space taken up by golf courses. In comparison, according to National Food Strategy, agricultural land covers 70% of the UK, with 70,000km² used for grazing and 67,000km² for cereals and legumes.

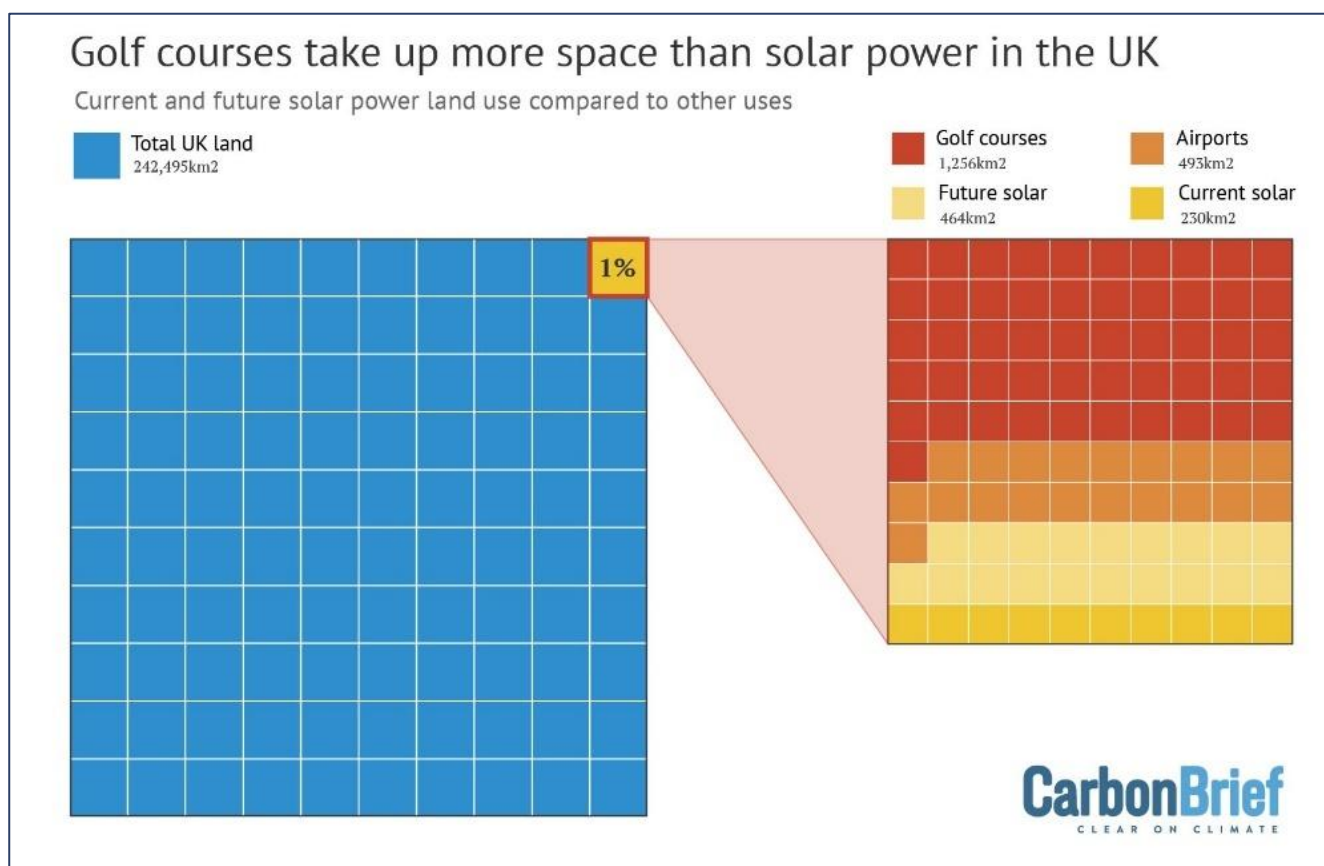


Figure 20 Image illustrating the amount of space solar power takes up in the UK.

8.4 Roof top solar

8.4.1 Commercial scale roof top solar arrays are encouraged by planning policy, but they are not a realistic alternative to solar farms due to the lack of ownership control over the roof, inadequate design to accommodate the weight of the solar arrays, and the need for a viable grid connection to export the energy and matching a suitable building with a nearby grid connection with capacity is likely to be challenging.



8.4.2 The UK government has introduced wider permitted development rights for commercial rooftops in an effort to encourage more of it, but achieving planning permission is not the barrier to their forthcomingness. Therefore, the initiative is likely to be ineffective.

8.4.3 The key point is that large scale ground mounted schemes are required to feed into the grid along with rooftop solar, rooftop solar is therefore not an alternative.

8.4.4 Furthermore, there are no viable, suitable, and available sites within a viable distance of the proposed point of connection that could accommodate the proposal, demonstrating that rooftop solar is not an alternative to ground mounted solar.

8.5 Agricultural Land Quality

8.5.1 PPW sets out that poorer agricultural land should be prioritised for development over higher grades. 'Higher Grades' (Grades 1, 2 and 3a) are classified as Best and Most Versatile (BMV) Agricultural Land.

8.5.2 Section 3.4 of this Statement addresses the avoidance of Best and Most Versatile land in more detail. The applicant has made significant efforts in avoiding BMV land through locating the proposed development on agricultural land quality no greater than Grade 4.

8.6 Co-Location of Agriculture

8.6.1 Solar farms can continue to support agricultural output, ensuring energy and food production can co-existence. They can accommodate grazing sheep, providing cost-free grass-keep and maintenance for the operator and an additional income source for the landowner. Solar farm sites offer a perfect environment for sheep grazing since they include additional shading.



Figure 21 Sheep grazing under solar arrays

8.6.2 The potential for co-existence of agriculture is a clear benefit of the scheme.

8.7 Conclusions on Implications on Food Production

8.7.1 Previously developed land, brownfield, contaminated land, industrial land or ALC Grades 3b, 4 or 5 should be used to avoid best and most versatile (BMV) agricultural land. Should BMV agricultural land be used for a proposed development, it would need to be justified by the most compelling evidence.

8.7.2 It has been demonstrated that we must balance the use of land between food production and energy production, where solar farms take up just 0.3% of the UK land area.

8.7.3 A review of previously developed (brownfield) sites has been undertaken within 3km of the application site. It is concluded that there are no suitable, alternative sites within or over 3km of the grid connection point.

8.7.4 PPW sets out that poorer agricultural quality land should be prioritised for development over higher grade land. The accompanying ALC report concludes the site is limited to subgrade 3b and as such avoids BMV land. The location of the development is therefore comprehensively justified.



9.0 Benefits of the Proposed Development

9.1 Environmental Benefits

9.1.1 Solar PV panels silently convert sunlight to electrical energy. They generate direct current (DC) that is converted by the inverter hardware to alternating current (AC) that can be used by the electricity grid. PV systems are rated for capacity in watts (or kW or MW) with the designation 'peak' (e.g. kWp, MWp). The peak capacity of individual panels is established by measuring their performance under internationally recognised standard conditions that include temperature and wavelength of sunlight. The actual output of a system will be determined by latitude, local weather and site conditions.

9.1.2 The proposals would have the capacity to generate approximately 25MWp of electricity. This equates to enough electricity to serve the total power needs of around 7,500 average UK households per annum. In accordance with guidance outlined by the Solar Trade Association (now Solar Energy UK) this would offset around 11,000 tonnes of CO₂ per annum, and 440,000 tonnes over the life of the scheme.

9.1.3 The proposals will deliver a net benefit to biodiversity. As recommended in the Preliminary Ecological Appraisal (PEA), the proposal includes several ecological enhancements and mitigation measures which are specified within the accompanying Landscape and Environmental Management Plan (LEMP). These can be summarised as:

- Retention and buffering of tree lines, ditches, watercourses and 'complex habitat mosaic'
- Partial retention of M23b, M25b and M25c habitats
- Method statement to protect reptiles and amphibians during vegetation clearance
- Natural regeneration of tussocky purple moor grass/rush pasture following construction will mitigate impacts on reptiles and breeding birds
- Sensitive methodology to protect commuting and foraging bats from light spill during construction
- Precautionary measures for badger, breeding birds, hedgehog and otter



- Basking opportunities for reptiles and singing/territory forming opportunity for breeding birds
- 15 no. tree-mounted bird boxes within existing tree lines
- 15 no. tree-mounted bat boxes within existing tree lines
- 6 no. hibernacular/habitat piles within undisturbed boundary vegetation and riparian corridor
- 1 no. otter hold within riparian corridor

9.2 Economic Benefits

9.2.1 The scheme offers significant economic benefits, which are estimated to include:

- Economic output of £522,000 GVA over 14 months
- £80,000 business rates generated per annum (£3.2m total) to Neath Port Talbot CBC
- Significant spin off benefits for the supply chain

9.2.2 The table below sets out a real-world example of the range of economic benefits which were derived through the construction phase of another solar farm of a similar scale built in Wales during 2019/2020. These direct economic benefits exceed £1M and therefore represent a significant and immediate benefit of the scheme.

Solar Farm Construction Phase Case Study - Local Economic Benefits					
Direct employment of agency workers	Peak 30 persons sourced from local labour market via agency staff				
Plant and tool hire from local firms	Contractor using main supplier accounts with local hire depots				
Purchasing of local materials	Contractor used main supplier accounts with local hire depots				
Accommodation and restaurant bookings	PM Team staying locally renting apartment circa £1300/ month				
	Local hotels for 4 x site support staff averaging £1,250 per month each				
	July	Aug	Sept	Oct	Nov
The number of local agency workers involved (or an approximate value of expenditure on agency contracts)	£ 17,223.00	£ 32,656.00	£ 36,220.00	£ 53,736.00	£ 54,363.00
An estimate of the amount spent on local plant and tool hire etc.	£ 3,000.00	£ 3,500.00	£ 5,500.00	£ 6,000.00	£ 6,000.00
An estimate of the amount spent on local materials	£ 2,088.00	£ 4,694.00	£ 5,555.00	£ 7,986.00	£ 8,017.00
Subcontractors staying in the local area; using hotels and restaurants etc	Currently two specialist contractors teams staying locally, approximately 100 person at peak renting local apartments in surrounding areas				
Specialist contractors appointed locally	Civil contractor - contracted works circa £550,000				
	Archaeological Advisor - contracted works circa £45,000				
	Electrical Engineering Contractor undertaking the HV electrical works - contracted works value circa £180,000				

Table 4 Table showing real world costs of solar farm construction in south Wales

9.2.3 Wider economic spin-off benefits would also been realised 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

9.2.4 In addition to these construction phase benefits, there will also be contracts issued in relation to the ongoing operation and maintenance of the solar farm, 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 panels and componentry
- Site security contracts

9.2.5 A transition to secure UK-produced energy could mitigate impacts of unexpected energy crises,



resulting in reduced energy bills and supply security. In this respect, 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.

9.2.6 The proposed scheme would be delivered without any government subsidy support and use existing grid infrastructure, avoiding costly upgrades to the network. As such, there is no burden placed on the tax payer to fund the development and the scheme would be liable for payment of business rates, providing a reliable tax revenue for its duration.

9.2.7 Furthermore, as we transition to electric vehicles and electric heating there is an unprecedented and growing demand on our electricity supply. The proposal will provide a significant amount of decentralized electricity to the area and support this transition whilst avoiding the economic fluctuations that are currently being experienced by motorists and householders.

9.3 Social Benefits

9.3.1 The proposal aims to decrease Wales'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 Wales in the short and long term.

9.3.2 The UK Energy Security Strategy (7th April 2022) states in the former Prime Minister's foreword:

"Global energy costs have been rising for some time as demand soars and factories roar back into life after COVID-19; Putin's invasion of Ukraine pushed them still higher and, ultimately, it is the consumer who ends up paying the price. This government is already stepping in to help, with over £9 billion of help for families struggling with their bills. But if we're going to get prices down and keep them there for the long term, we need a flow of energy that is affordable, clean and above all secure. We need a power supply that's made in Britain, for Britain – and that's what this plan is all about. We're not going to try and turn back the clock to the days when we choked our streets and our atmosphere with filthy fumes and ever-rising levels of climate-imperilling carbon dioxide. Instead, we're going to take advantage of Britain's inexhaustible resources of wind and – yes – sunshine."

9.3.3 The applicant has discussed a community benefit fund with community councils and has invited 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.

9.4 Weight to be Given to the Benefits in the Planning Balance

9.4.1 The weight to be given to the benefits of this proposal is a judgement for the decision maker. However, it is appropriate to review the degree of weight given to such benefits by reviewing the Government's decisions on other similar solar farm proposals, where the benefits are broadly similar.

9.4.2 A recent decision made on 11th of October 2024 (DNS ref: DNS/3279521) was approved and provides a highly relevant steer on the degree of weight to be given to the benefits of renewable energy. The Inspector's Report (full report attached in Appendix C) identifies that Future Wales Policy 17 requires decision makers to give significant weight to the need to meet Wales' international commitments and the Government's target to generate 70% of consumed electricity by renewable means by 2030. They therefore afford the "whole-life" impact of the proposed development to have a "significant beneficial effect". The Inspector concludes by saying:

"Renewable and low carbon energy development has an important role to play in meeting the Government's renewable energy targets. The need to meet the 70% target set out in FW policy 17 is of considerable importance and the 100% target by 2030 announced in July 2023. This proposal aligns with this development plan policy and is afforded considerable weight".

9.4.3 Whilst this proposal does not have the same constraints as the above case study and conforms with both local and national planning policy, this case study clearly demonstrates the benefits to the environment of utility scale production of renewable energy and should carry exceptional and significant weight.



10.0 Summary of Community Consultation

10.1 Engagement with the Community Council

- 10.1.1 In advance of the statutory pre-application consultation period, Lighthouse Development Consulting in conjunction with Thirty47 and Greentech organised a presentation to Seven Sisters Community Council.
- 10.1.2 The presentation explained the aims of the proposal, the site selection process, provided the draft proposed layout, explained the DNS process, provided a project timeline, the local and national policy position and discussion around the community benefit fund. It also set out what the approach would be in terms of consultation.
- 10.1.3 It explained that the approach to consultation would be in two phases. The first was engagement with community stakeholders (which formed the presentation) and then a second stage of statutory consultation.

10.2 Community Consultation

- 10.2.1 A Consultation Report accompanies this application. The report outlines the process of community consultation undertaken in respect to the proposal and ensuring compliance with the DNS Procedure Order.
- 10.2.2 The principal means of engaging with the community was through a public exhibition. A public exhibition was held on Tuesday 18th March 2025, where details of the proposed development were presented on a series of banners. Members of the design, applicant and communications team attended the public exhibition and were available to answer any questions.
- 10.2.3 The event was advertised locally and online, with it being publicised weekly on the community's Facebook page. Key stakeholders, including the community council and ward members were invited by email well in advance of the event, with a specific slot allocated to these key stakeholders prior to the commencement of the event.
- 10.2.4 The event was well attended by local residents. It was a positive experience enabling effective communication between the community and the applicant team. The event provided a wealth of information and addressed concerns, ultimately leading to a better informed designed scheme.



11.0 Planning Policy Context

11.1 Legislative Context

11.1.1 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.

11.1.2 In this context, Future Wales: The National Plan 2040 represents the National Development Framework for Wales and should be read alongside Planning Policy Wales: Edition 12.

11.1.3 There is currently no Strategic Development Plan covering the site area.

11.1.4 The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) was adopted in January 2016.

11.2 National Development Framework – Future Wales 2040

11.2.1 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.”

11.2.2 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.”

11.2.3 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.”*

11.2.4 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.”

11.2.5 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.”

11.2.6 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.”

11.2.7 As this is a Development of National Significance, Policy 18 (Renewable and Low Carbon Energy



Developments of National Significance) is of relevance to the proposed development. The Policy is criteria based and states that proposals for renewable and low carbon energy projects qualifying as *Developments of National Significance* will be permitted subject to Policy 17 (above) and the following criteria:

- 1. Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
- 2. The proposal is designed to minimise its visual impact on nearby communities and individual dwellings, and the cumulative impact of the proposal, with other existing or proposed development, is acceptable;*
- 3. There are no adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;*
- 4. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;*
- 5. There are no unacceptable adverse impacts on statutorily protected built heritage assets;*
- 6. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;*
- 7. There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);*
- 8. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;*
- 9. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;*
- 10. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.*



11.3 Planning Policy Wales (Edition 12, 2024)

11.3.1 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.

11.3.2 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

11.3.3 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.”*

11.3.4 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 crossdepartment 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”.*

11.3.5 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.”*

11.3.6 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”.*

- 11.3.7 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.
- 11.3.8 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.”*
- 11.3.9 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.
- 11.3.10 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.”*
- 11.3.11 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.”*
- 11.3.12 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.”*

11.3.13 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”.*

11.3.14 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.”*

11.3.15 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.”*

11.4 Neath Port Talbot County Borough Council Local Development Plan

11.4.1 The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) was adopted in January 2016. The key policies relevant to the proposal are set out in the following table:

Table 5 LDP Policies relevant to the proposal

Planning Consideration		Relevant Planning Policy
Renewable Energy	Policy SP 18	Renewable and Low Carbon Energy

	Policy RE 1	Criteria for the Assessment of Renewable and Low Carbon Energy Development
	Policy RE 2	Renewable and Low Carbon Energy in New Development
Principle of Development	Policy SP 1	Climate Change
	Policy SC 1	Settlement Limits
	Policy SP 6	Development in the Valleys Strategy Area
Landscape and Visual	Policy EN 2	Special Landscape Areas
	Policy BE 1	Design
Environment	Policy SP 15	Biodiversity and Geodiversity
	Policy EN 6	Important Biodiversity and Geodiversity Site
	Policy EN 7	Important Natural Features
	Policy EN 8	Pollution and Land Stability
	Policy SP 16	Environmental Protection
	Policy M 1	Development in Mineral Safeguarding Areas
Cultural Heritage	Policy SP 21	Built Environment and Historic Heritage
Amenity	Policy SP 4	Infrastructure
	Policy I 1	Infrastructure Requirements

Renewable Energy

11.4.2 **Policy SP 18: Renewable and Low Carbon Energy** seeks to deliver a proportionate contribution to meeting Wales' national renewable energy targets and energy efficiency targets.

A proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and



communities. This will be achieved by:

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

11.4.3 Policy RE1 Criteria for the Assessment of Renewable and Low Carbon Energy Development sets out criteria against which all proposals for renewable and low carbon energy development will be assessed.

Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria:

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



- c) *The development will not compromise highway safety;*
- d) *The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and*
- e) *There are satisfactory proposals in place for site restoration as appropriate.*

11.4.4 **Policy RE 2 Renewable and Low Carbon Energy in New Development** addresses that Schemes that connect to existing sources of renewable energy, district heating networks and incorporate on-site zero / low carbon technology (including microgeneration technologies) will be encouraged.

Principle of Development

11.4.5 **Policy SP 1: Climate Change** is a strategic policy that is of fundamental importance to the LDP influences every aspect of the Plan's development.

In relation to the causes of climate change:

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

1. *Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance*



or in locations that could increase the risk of flooding elsewhere;

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

Landscape and Visual

- 11.4.6 Owing to the fact that the proposed development falls within the Dulais Valley Special Landscape Area (EN2/2), **Policy EN 2 Special Landscape Areas** ensures that:

Development within the designated Special Landscape Areas will only be permitted where it is demonstrated that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated.

Environment

- 11.4.7 **Policy SP 15: Biodiversity and Geodiversity** aims to ensure that biodiversity is fully taken into account in all planning decisions.

Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures:

- 1. The identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection:*
 - (a) Special Areas of Conservation (SACs) and Ramsar Sites;*
 - (b) Sites of Special Scientific Interest (SSSIs);*
 - (c) National Nature Reserves (NNRs).*
- 2. The identification and protection of sites of regional and local importance;*
- 3. The protection of important natural heritage features.*

- 11.4.8 **Policy EN 6: Important Biodiversity and Geodiversity Site** seeks to ensure that there is no reduction in the overall value of the area or feature. Where mitigation is not possible, compensation measures will normally be required to offset harm as far as practicable. However, compensation measures are



considered to be a last resort option.

Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:

- 1. They conserve and where possible enhance the natural heritage importance of the site;
or*
- 2. The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site.*

Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.

11.4.9 **Policy EN 7: Important Natural Features** seeks to retain and enhance local landscape features that are of importance for biodiversity, such as trees, woodland, hedgerows and other field boundaries, watercourses, wetlands and ponds and green lanes.

Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows/field boundaries, watercourses or ponds will only be permitted where:

- 1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or 2*
- 2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.*

11.4.10 **Policy EN 8: Pollution and Land Stability** seeks to ensure that developments will not exacerbate existing problems, cause new problems or result in more people being routinely exposed to unacceptable pollution levels of any type.

Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity



and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted:

- *Air pollution;*
- *Noise pollution;*
- *Light pollution;*
- *Contamination;*
- *Land instability;*
- *Water (including groundwater) pollution.*

Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.

11.4.11 **Policy SP 16: Environmental Protection** sets out the approach that will be taken to protect and improve the environment as far as possible.

Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:

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

Cultural Heritage

11.4.12 **Policy SP21: Built Environment and Historic Heritage** seeks to conserve and enhance the built environment and heritage of the whole County Borough including the identified 'gateways'.

The built environment and historic heritage will, where appropriate, be conserved and enhanced



through the following measures:

1. *Encouraging high quality design standards in all development proposals;*
2. *Protecting arterial gateways from intrusive and inappropriate development;*
3. *Safeguarding features of historic and cultural importance;*
4. *The identification of the following designated sites to enable their protection and where appropriate enhancement:*
 - (a) *Landscapes of Historic Interest;*
 - (b) *Historic Parks and Gardens;*
 - (c) *Conservation Areas;*
 - (d) *Scheduled Ancient Monuments; and*
 - (e) *Listed Buildings and their curtilage*

11.5 National Policy Statements

- 11.5.1 The National Policy Statements (NPSs) for energy outline national policies for energy infrastructure and provide planning guidance for Nationally Significant Infrastructure Projects (NSIPs). Whilst they relate specifically to NSIPs, they are a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990. Whether the Policies in the NPS are material and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy.
- 11.5.2 A recent Appeal Decision (APP/C4615/W/24/3345744) issued on 4th February 2025 for a Battery Energy Storage System (BESS) has clarified the position in this regard with the Inspector explaining the relevance of the NPSs:

“It would be remiss to not highlight the direction of travel in terms of Government energy policy at the very outset of my decision. A material consideration in the determination of planning proposals for renewable energy are the National Policy Statements (NPS) for the delivery of major energy



infrastructure. The NPSs recognise that large scale energy generating projects will inevitably have impacts, particularly if sited in rural areas. The Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) both state that the NPSs can be a material consideration in decision making on applications that both exceed or sit under the thresholds for nationally significant projects. Further, Paragraph 213 of The Energy Act 2023 now includes energy provided from battery storage as its own subset of energy generation.”

- 11.5.3 The revised EN-1 and EN-3 came into force on 17th January 2024. The NPSs highlight the urgent need for new electricity generating capacity in the UK to ensure a secure, reliable and affordable energy supply while meeting decarbonisation targets.
- 11.5.4 Section 4.2 (*The critical national priority for low carbon infrastructure*) of EN-1 sets out that Government have concluded that there is a “*critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.*”
- 11.5.5 Paragraph 1.1.1 of EN-3 states there is “*an urgent need for new electricity generating capacity to meet our energy objectives*”. It proceeds to state “*Electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6)*”. Government analysis suggests that demand for electricity could more than double by 2050 suggesting a requirement for a fourfold increase in low carbon electricity generation, with most from renewables.
- 11.5.6 Section 2.10 relates solely to Solar Photovoltaic Generation. Paragraph 2.10.9 states “*The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector*”.
- 11.5.7 Paragraph 2.10.10 states “*the British Energy Security Strategy states that government expects a five-fold increase in solar deployment by 2035 (up to 70GW)*”.
- 11.5.8 Due to the size of area needed for solar development it is accepted that there will be impacts on rural areas. The NPS states at Paragraph 2.10.17 “*Along with associated infrastructure, a solar farm requires between 2 to 4 acres of each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres...this scale of development will inevitably have*



impacts, particularly if sited in rural areas.”

- 11.5.9 The NPS recognises the various factors that influence site selection and design. It acknowledges at Paragraph 2.10.25 that the distance from the solar farm to the point of connection can have a “*significant effect on the commercial feasibility*” of a proposal.
- 11.5.10 It also states at Paragraph 2.10.29 “*while land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of “Best and Most Versatile” agricultural land where possible.*” However, it proceeds to explain at Paragraph 2.10.30 that ground mounted solar arrays “*is not prohibited*” on BMV land or sites designated for their natural beauty or recognised for ecological or archaeological importance.
- 11.5.11 The NPS has also clarified at Paragraph 2.10.53 that “*From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.*” As such, the capacity threshold for Town and Country Planning Act applications is 350MW in Wales.
- 11.5.12 The emphasis on the need for renewable energy, particularly solar, is evidenced by the latest National Policy Statements. These statements highlight the critical need for new electricity generating capacity in the UK to meet decarbonisation targets.

11.6 Other Material Considerations

The Environment (Wales) Act 2016

- 11.6.1 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.
- 11.6.2 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 data³ shows Wales’
- 11.6.3 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.

11.6.4 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.

11.6.5 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.

11.6.6 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.

11.6.7 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.

11.6.8 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

11.6.9 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.”*

11.6.10 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

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

11.6.12 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.”

11.6.13 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

- 11.6.14 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.
- 11.6.15 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.

Transitioning to a net zero energy system: smart systems and flexibility plan 2021- Department for Business, Energy and Industrial Strategy and Ofgem

- 11.6.16 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”.

11.7 Summary

- 11.7.1 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 of solar development, which would generate energy through a renewable source.



12.0 Planning Assessment

12.1 Assessment of the Principle of Development on the Proposed Site

- 12.1.1 Policy 17 of the NDF makes clear that the Welsh Government “*strongly supports the principle of development of renewable and low carbon energy*” and that decision makers must give “*significant weight*” to the need to meet Wales’s international commitments and target of generating 70% of consumed electricity by renewable means by 2030, in order to combat the climate emergency.
- 12.1.2 Furthermore, Policy 18 of the NDF states that proposals for renewable and low carbon energy projects qualifying as Developments of National Significance will be permitted subject to Policy 17 and a meeting an identified criterion. An assessment against that Criteria is as follows:
1. *Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);*
- 12.1.3 This application is accompanied by a Landscape and Visual Appraisal (LVApp) prepared by Tir Collective. The LVApp, which has assessed the potential effects of the proposed development on the landscape character and visual amenity for a 3km study area. The methodology used for assessing the potential effects on landscape character and visual amenity were based on the recommendations in GLVIA3.
- 12.1.4 The site is not located within or close to a statutory designated landscape. The majority of the site is located inside the Dulais Valley Special Landscape Area.
- 12.1.5 The LVApp concludes that during construction, effects on the sloping landform on the Dulais valley side would be minor adverse due to the small-scale change for moderate-low sensitivity receptors. Effects are assessed as minor adverse during operation and minor neutral during decommissioning but once activities are completed, the landscape would be fully restored and effects would be negligible.
- 12.1.6 Once the establishment and decommissioning effects on the landscape character and features resulting from mitigation and management they will be beneficial to landscape character and features. The proposals detailed within the Landscape and Ecology Management Plan would result in strengthening and enhancement of the site. As such, it is considered that the proposed development



meets the requirements of Criterion 1 of the Policy.

2. *The proposal is designed to minimise its visual impact on nearby communities and individual dwellings, and the cumulative impact of the proposal, with other existing or proposed development, is acceptable;*

12.1.7 Having regard to visual impact the assessment concludes that overall, the most adverse visual effects would occur within and close to the site during construction and operation. As distance increase from the site, visual effects would reduce. For residents within the settlement of Seven Sisters, views are expected but would be partial, filtered and/or oblique and would include existing man-made infrastructure in baseline views.

12.1.8 As such, it is considered that the proposal as been designed to minimise visual impact on nearby community and individual dwellings and the cumulative impact of the proposal, with other existing or proposed development is acceptable and thus meets the requirements of Criterion 2 of the Policy.

3. *There are no adverse impacts on international and national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;*

12.1.9 The site is not nationally or internationally designated for nature conservation. Furthermore, the proposed development is considered to have minimal adverse impacts on designated sites and protected species. As such, it is considered the proposed development meets the requirements of Criterion 3 of the Policy.

4. *The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;*

12.1.10 The proposed development includes enhancement measures which provide a net benefit for biodiversity. These are illustrated within the accompanying LEMP. As such, the proposal is considered to meet the requirements of Criterion 4 of the Policy.

5. *There are no unacceptable adverse impacts on statutorily protected built heritage assets;*

12.1.11 This application is accompanied by a Heritage Desk Based Assessment which concludes that there is potential for a low adverse impact to the setting and heritage significance of the site and thus not



unacceptable. As such, the proposal is considered to meet the requirements of Criterion 5 of the Policy.

6. *There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;*

12.1.12 This application is supported by a Noise Impact Assessment prepared by ITP Energised (now SLR). The predicted noise levels were within BS4142 derived criteria at noise sensitive receptors and below the measured representative background level. As such, noise impacts will be 'not adverse' at the closest noise sensitive receptor during the daytime and night-time periods and thus not unacceptable.

12.1.13 The application is supported by a Glint and Glare assessment prepared by Pager Power, which concludes that there will be no significant impacts predicted upon road safety and residential amenity and no mitigation required.

12.1.14 As such, it is considered that the proposal meets the requirements of Criterion 6 of the Policy.

7. *There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);*

12.1.15 Further to the above, the Glint and Glare assessment concludes that no significant impacts are predicted upon aviation activity and thus meeting the requirements of Criterion 7.

8. *There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;*

12.1.16 This application is accompanied by a Transport Assessment/CTMP which demonstrates that there will be no unacceptable adverse impacts on the transport network during construction and operation.

9. *The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;*

12.1.17 The proposed solar panels would consist of solar cells, glass, EVA (ethylene vinyl acetate binding agent), polymer back sheet and frame. Recent studies factoring the embodied carbon impacts of Solar PV manufacturing have shown that Solar PV in the UK will save more operational carbon than the embodied carbon of production. At the decommissioning stage the component materials of steel and glass can be easily disassembled and recycled to further minimise the embodied impacts of the



development.

- 12.1.18 As the proposed development is temporary, the components can be easily removed from the site during decommissioning, which will leave a legacy of environmental enhancements.

10. *There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.*

- 12.1.19 Acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration can be secured through the appropriate wording of a planning condition attached to any consent granted.
- 12.1.20 Having assessed the proposed development against Policy 17 and 18 of the NDF. It is considered that it aligns positively with the requirements of the Policy and thus there is no conflict. As such, the principle of development is considered to be compliant with national policy.
- 12.1.21 Planning Policy Wales (PPW) supports renewable energy where all forms of renewable and low carbon energy development should be facilitated and maximised in order to meet national and international targets.
- 12.1.22 In accordance with PPW, the social, environmental and economic benefits associated with this development should be given weight in the decision making process.
- 12.1.23 PPW outlines that there are significant opportunities to achieve local benefits through renewable energy developments. The developer has committed to a community benefit fund and thus allowing the community to have a shared ownership of the value of the scheme.
- 12.1.24 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. The assessment against Policy 18 of the NDF sets out that there will be no detrimental impact on the environment and local amenity.
- 12.1.25 Policy SP1 of the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) sets out the overarching strategy for climate change. This principle of development is supported by Policy because it will represent a contribution to the Council's renewable and low carbon energy



generation.

12.1.26 In addition to the above, the principle of development is supported by Policy SP 18 (*Renewable and Low Carbon Energy*) of Neath Port Talbot County Borough Council Local Development Plan (2011-2026). The policy sets out that a proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. The Policy states it will encourage where appropriate all forms of renewable energy and low carbon technology development and thus the proposal is supported in Policy.

12.1.27 Policy RE1 (*Criteria for the Assessment of Renewable and Low Carbon Energy Development*) sets out the criteria against which all proposals for renewable energy development will be assessed. An assessment against the Criteria relevant to the proposal is set out below:

4. All renewable energy or low carbon energy development proposals will be required to demonstrate that:

a) Measures have been taken to minimise impacts on visual amenity and the natural environment;

12.1.28 As has been explained above, the proposed development has taken measures to minimise impacts on visual amenity and the natural environment through both careful site selection and a mitigation strategy set out in the LEMP.

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

12.1.29 As has been explained above, the proposed development will not result in unacceptable impacts on residential amenity.

c) The development will not compromise highway safety;

12.1.30 As has been described above, the proposed development will not compromise highway safety with all relevant considerations assessed through the Transport Assessment and CTMP

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



services communications; and

- 12.1.31 As has been described above, the proposal will not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services.

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

- 12.1.32 Satisfactory proposals for site restoration can be secured through the appropriate wording of a planning condition attached to any consent granted. These requirements would run with the land and can be relied upon to secure decommissioning of the scheme.
- 12.1.33 As such it is considered the proposed development is in accordance with Policy RE1.



13.0 Assessment of Environmental Impacts

13.1 Overview

- 13.1.1 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.

13.2 Landscape and Visual

- 13.2.1 The proposed development falls within the Dulais Valley Special Landscape Area (SLA). SLA's are non-statutory designations applied by the local planning authority to define areas of high landscape importance within their administrative boundary. The south and central part of the site is located within the SLA 2 Dulais Valley. The relevant primary landscape qualities and features are described in Neath Port Talbot Council's Landscape and Seascape Supplementary Planning Guidance (May 2018), with the relevant extract included at Appendix D.
- 13.2.2 The accompanying LVApp sets out that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated.
- 13.2.3 The LVApp has examined the landscape and visual impacts in relation to the proposed solar farm. The potential impacts have been thoroughly assessed through a combination of desk studies, walk-over survey and reconnaissance of the surrounding landscape of the site.
- 13.2.4 Proposals for the site retain and incorporate key landscape features such as trees and hedgerows. This helps to integrate the proposed solar farm and ancillary structures into the landscape whilst minimising potential impacts on character.
- 13.2.5 The accompanying Landscape Masterplan and Ecology Management Plan includes mitigation and enhancement proposals for provision of additional habitat and beneficial management of existing and proposed landscape features.
- 13.2.6 Whilst the site would change from rough grassland, the characteristic valley side transition to upland character would appropriately accommodate the development and changes would be temporary and fully restored following decommissioning, incorporating landscape enhancement through planting and management. Visual effects of the site would also be contained due to the retained and surrounding



trees, hedgerows and vegetation screening views towards the proposals.

- 13.2.7 Although the proposed development would introduce the presence of solar development within the landscape, it would not result in a change to the overall character of the Dulais valley side and character transition to upland, accommodated alongside existing electricity infrastructure in the landscape.

13.3 Ecology

- 13.3.1 Avoidance, mitigation and compensation measures have been incorporated into the design to ensure that the proposals have minimal adverse impacts on designated sites and protected species.

- 13.3.2 Mitigation measures include:

- Retention and buffering (15m) of tree lines, ditches, watercourses and 'complex habitat mosaic' and adherence to Pollution Prevention for Businesses (2024) guidance during construction.
- Partial retention of M23b, M25b and M25c habitats.
- Method statement to protect reptiles and amphibians during vegetation clearance.
- Natural regeneration of tussocky purple moor grass/rush pasture following construction will mitigate impacts on reptiles and breeding birds.
- Sensitive methodology to protect commuting and foraging bats from light spill during construction.
- Precautionary measures for badger, breeding birds, hedgehog and otter.
- Installation of solar arrays will also provide basking opportunities for reptiles and singing/territory forming opportunities for breeding birds and will compensate for the degradation of habitat condition below the arrays. The solar arrays can increase structural diversity, create new microclimates and increase invertebrate numbers.

- 13.3.3 Enhancement measures include:

- 15 no. tree-mounted bird boxes within existing tree lines.
- 15 no. tree-mounted bat boxes within existing tree lines.



- 6 no. hibernacula/habitat piles within undisturbed boundary vegetation and riparian corridor.
- 1 no. otter holt within riparian corridor.

13.3.4 The site therefore provides a biodiversity net benefit with minimal impacts to biodiversity and ecology.

13.4 Cultural Heritage

13.4.1 The accompanying Heritage DBA has considered the potential for indirect impacts to heritage assets, in the form of settings effects, this report has identified the potential for a low adverse impact to the setting and heritage significance of Pen-cae'r-lan Farmstead, through a change to the use and character of the associated farmland. Pen-cae'r-lan Farmstead is assessed to be a heritage asset of Low Significance, deriving from the historical, evidential, and setting value.

13.5 Flood Risk and Drainage

13.5.1 The accompanying Flood Risk Statement identifies that the main site is located within DAM Zone A, which is an area considered to be at little or no risk of fluvial or tidal/coastal flooding.

13.5.2 A small section of the access track area is located within DAM Zone C2 and Flood Zone 3 of the FMfP.

13.5.3 The Main Site is at a very low risk of reservoir flooding and is at very low risk of fluvial, tidal, groundwater and sewer flooding.

13.5.4 The Main Site is shown to be at risk of flooding from small watercourses. However, this risk is confined to the watercourse corridor. 5m buffers have been retained around watercourse corridors and it is therefore considered that surface water flood risk to the Main Site is low.

13.5.5 The access track is at very low risk of reservoir flooding and is at low risk of tidal, groundwater and sewer flooding. The access track is within an area that is shown to be at low to medium risk of fluvial flooding. However, as it is within the River Neath flood alert area. It is therefore thought that access to the main site from the track can be managed so that future planned maintenance will only occur when there is no alert in place.

13.5.6 All aspects of the Acceptability Criteria set out in TAN-15 have been assessed and shown to be satisfied. Consequently, we conclude that on the grounds of flood risk, the proposed development meets the requirements set out in TAN-15 and the aims of Planning Policy.



13.6 Traffic and Transport

- 13.6.1 This application is accompanied by a Transport Assessment/CTMP which demonstrates that there will be no unacceptable adverse impacts on the transport network during the construction and operational phases of the development

13.7 Glint and Glare

- 13.7.1 The accompanying Glint and Glare Assessment concludes that:

No significant impacts are predicted upon road safety and residential amenity, and no mitigation is required; and

No significant impacts are predicted upon aviation activity associated with Rhigos Airfield, no mitigation is required and detailed modelling is not recommended.

13.8 Noise

- 13.8.1 This application is supported by a Noise Impact Assessment prepared by ITP Energised. The predicted noise levels were within BS4142 derived criteria at noise sensitive receptors and below the measured representative background level. As such, noise impacts are assessed as 'not adverse' at the closest noise sensitive receptor during the daytime and night-time periods and thus not unacceptable.



14.0 Overall Conclusions

14.1 Summary of Planning Policy Requirements

- 14.1.1 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.

14.2 Need for the Proposals

- 14.2.1 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.
- 14.2.2 The Welsh Government has set its own legally binding targets under the Environment (Wales) Act 2016, which includes achieving net zero by 2050.
- 14.2.3 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**.
- 14.2.4 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.

14.3 Benefits of the Proposals

- 14.3.1 The proposals would generate approximately 25 MWp of electricity. This equates to enough electricity to serve the total power needs of around 7,500 average UK households per annum. In accordance with guidance outlined by the Solar Trade Association (now Solar Energy UK) this would offset around 10,750 tonnes of CO₂ per annum, and 430,000 tonnes over the life of the scheme. The environmental benefits of the scheme far outweigh the impacts resulting from the carbon footprint of the panels themselves.



- 14.3.2 The economic benefits of the scheme include economic output of £500,000 GVA over 14 months, £80,000 business rates generated per annum to the Council, and significant spin off benefits for the supply chain with gross value added (GVA) far in excess of £1million.
- 14.3.3 The proposed scheme would provide a significant amount of decentralised electricity to the area and support the transition to electric vehicles and heating. It would also help to reduce the UK's reliance on imported fossil fuels and help the UK gain more control over its energy provision and energy security, helping to stabilise domestic fuel bills.
- 14.3.4 Net additional benefits are not the only benefits. Benefits extend to the mitigation of impacts from climate change. The proposals will also help to minimise the economic and environmental cost of climate change including potential catastrophic impact to agriculture from a drier climate and economic impacts of climate change to the UK economy of up to £68billion by 2100 in lost GDP.

14.4 Summary of Impacts

- 14.4.1 The potential impacts that could arise from the proposed development have been identified in Section 13 of this statement. These include: Landscape and visual, Ecology, Cultural Heritage, Flood Risk and Drainage, Highways, Glint and Glare and Noise.
- 14.4.2 All of these factors have been assessed in detail using evidence based assessments undertaken by 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 benefit to biodiversity.

14.5 Compliance with Planning Policy and Planning Balance

- 14.5.1 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.
- 14.5.2 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.
- 14.5.3 If it were to be concluded that there is some degree of conflict with the Development Plan when taken



as a whole, there are material considerations that indicate that planning permission should be granted, which include the very significant benefits of the proposed development when applied in the planning balance, which further support the case for granting planning permission.

14.5.4 The weight to be given to the benefits of this proposal is a judgement for the decision maker. However, it is appropriate to review the degree of weight given to such benefits by reviewing the Government's decisions on other similar solar farm proposals, where the benefits are broadly similar.

14.5.5 A recent decision made on 11th of October 2024 (DNS ref: DNS/3279521) was approved and provides a highly relevant steer on the degree of weight to be given to the benefits of renewable energy. The Inspector's Report (full report attached in Appendix C) identifies that Future Wales Policy 17 requires decision makers to give significant weight to the need to meet Wales' international commitments and the Government's target to generate 70% of consumed electricity by renewable means by 2030. They therefore afford the "whole-life" impact of the proposed development to have a "significant beneficial effect". The Inspector concludes by saying:

"Renewable and low carbon energy development has an important role to play in meeting the Government's renewable energy targets. The need to meet the 70% target set out in FW policy 17 is of considerable importance and the 100% target by 2030 announced in July 2023. This proposal aligns with this development plan policy and is afforded considerable weight".

14.5.6 Whilst this proposal does not have the same constraints as the above case study and conforms with both local and national planning policy, this case study clearly demonstrates the benefits to the environment of utility scale production of renewable energy and should carry exceptional and significant weight.

14.6 Final Conclusions

14.6.1 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. 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.

Appendices

Appendix A – Benchmark land value

Table 5.16 – Benchmark land value (for cleared sites with approvals)

Land useage	Value Area	Guide value (per acre)
Residential	Low	£350,000
	Average	£450,000
	Good	£1,000,000
Industrial	Low	£125,000
	Average	£175,000
	Good	£275,000
Office	Low	£125,000
	Average	£175,000
	Good	£300,000
Retail foodstore	Low	£1,000,000
	Average	£1,250,000
	Good	£1,500,000
Retail warehouse	Low	£500,000
	Average	£550,000
	Good	£600,000
Small retail out of town	Low	£200,000
	Average	£300,000
	Good	£400,000
Leisure	Low	£450,000
	Average	£500,000
	Good	£550,000
Student accommodation	Low	£500,000
	Average	£600,000
	Good	£700,000
Care Home	Low	£450,000
	Average	£600,000
	Good	£800,000



Appendix B – EIA Screening Opinion (DNS 3272424)



Appendix C – Inspectors Report and Minister Decision (DNS ref: DNS/3279521)

Appendix D – SLA2 Dulais Valley Features and Characteristics

SLA2 Dulais Valley Features and Characteristics

- SLA2 stretches from the outskirts of Aberdulais in the south to Seven Sisters in the north. The SLA covers the valley sides to reinforce its visual context and therefore includes the unforested uplands of Mynydd Hirfynydd and Mynydd Marchywel as the backdrop to the valley. Areas of forestry plantation are included on both valley sides for coherence as it forms the same land mass and recognising that the appearance and biodiversity of this landcover can be enhanced through management. To the south-east the SLA links to the Vale of Neath SLA via a contiguous boundary (refer to SLA 3 below).
- The Dulais is a typical upland u-shaped glacial river valley creating a wide valley floor and predominantly open landscape on the valley sides. The north east – south west running ridge along the Dulais valley is important for its Pennant sandstones and coal measures.
- It is a wide, rolling, pastoral valley with significantly treed field boundaries, many of these contain grown out hedges which are a strong element in this landscape on the lower ground whereas drystone walls are a landscape feature of the upper reaches of the valley sides.
- Tranquillity is a key feature of the upper ridge areas supported by lack of development. It should be noted that whilst the tranquillity indices for the upper slopes indicate that they are “undisturbed” there has been a degrading of the valley floor from zone C to Zone B.
- It is an evolved landscape containing evidence from prehistory, important Roman remains, open cast and forestry. The edges of the woodland are often regular and geometric, forming an abrupt edge to the surrounding open areas, which reduces the sense of place in the upper valley sides.
- Although the historic context is mostly Roman, the landscape contains many examples of prehistoric land uses and the presence of sheepfolds indicates the importance of animal husbandry, in this area, in the post-medieval period.
- The ridge of Mynydd Hirfynydd has been a significant route through the landscape from the prehistoric period through into the medieval period, which is now used as an historic walk (Sarn Helen). It is also crossed by the long distance footpath St Illtyd's Way.
- The Cefn Coed Colliery Museum, located to the south of Crynant, is an example of the mining industry which until the 1980s visually dominated the visual and social landscape of the S Wales Valleys and provided a strong sense of place and cohesion to the valley.



lighthouse
DEVELOPMENT CONSULTING