A TETRA TECH COMPANY

HEOLDDU SOLAR FARM

PLANNING STATEMENT

September 2025

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Abbreviations

Abbreviation	Meaning
AC	Alternating Current
BMV	Best and Most Versatile
CCC	Carmarthenshire County Council
CEMP	Construction Environmental Management Plan
CO2	Carbon Dioxide
CTMP	Construction Traffic Management Plan
DC	Direct Current
DNO	District Network Operator
DNS	Development of National Significance
EIA	Environmental Impact Assessment
ES	ES
FES	Future Energy Scenarios
H	Height
HLCA	Historic Landscape Character Area
L	Length
LDP	Local Development Plan
LEDS	Landscape and Ecological Design Scheme
LNR	Local Nature Reserves
LPA	Local Planning Authority
LV	Low Voltage
MV	Medium Voltage
NLA	National Landscape Area
NSR	Noise Sensitive Receptor
PAC	Pre-Application Consultation
PEDW	Planning and Environment Decisions Wales
POC	Point of Connection
PPW	Planning Policy Wales
PRoW	Public Right of Way

Abbreviation	Meaning
PV	Photovoltaic
RHL	Registered Historic Landscape
RIGS	Regionally Important Geological Site
RLDP	Replacement Local Development Plan
RVAA	Residential Visual Amenity Assessment
SINC	Site of Nature Conservation Interest
SLA	Special Landscape Area
SMP	Soil Management Plan
SPG	Supplementary Planning Guidance
SuDS	Sustainable Urban Drainage Features
TAN	Technical Advice Note
VILL	Visually Important Local Landscapes
W	Width
WBFG	Well-being of Future Generations
WSI	Written Scheme of Investigation

Units

Unit	Description
GW	Gigawatt
Ha	Hectare
km	Kilometre
kV	Kilovolt
MW	Megawatt
m	Metres
TWh	Terawatt-hour

1 Introduction

1.1 The Applicant

1.1.1 Heolddu Solar Farm Limited (the Applicant) is a registered company of Qualitas Energy. Qualitas Energy has been leading the drive of renewable energy, energy transition, and sustainable infrastructure development in Europe for over 18 years. Qualitas Energy consists of a team of over 690 professionals who work together, sharing objectives and a commitment to sustainability. In total, 1.1 million homes have been supplied with clean energy through Qualitas Energy electricity generation, and it has 18GW in its energy asset portfolio in operation and development.

1.1.2 Qualitas Energy is a leading fund manager focused on renewable energy, energy transition and sustainable energy infrastructure. Its mission is to drive the change towards a decarbonized economy through focusing its investments into energy transition and sustainability-related assets. Since its inception in 2007, Qualitas Energy has invested c. EUR 12 billion and managed 5 different funds. Qualitas Energy's team delivers across all the relevant aspects of the value chain including, development, construction, financing, operations, and energy management.

1.1.3 To date, Qualitas Energy has an operational output of 585 MW of solar with a further 6.1 GW in development. With offices in London, Bristol and Edinburgh, as well as over 20 staff in the UK, Qualitas Energy is committed to accelerating the energy transition in the United Kingdom. As well as solar, Qualitas Energy is committed to delivering wind energy infrastructure and renewable natural gas with two renewable biomethane gas generating facilities and one gas injection hub under construction in England. With a pipeline of renewable biomethane gas projects, Qualitas Energy is expected to become the leading biomethane and green CO2 producer in the UK.

1.2 Background to the application

1.2.1 The Welsh Government wishes to see energy generation, storage and management play a role in supporting the Welsh and South-West Wales economies.

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

1.2.3 2019 saw the Welsh and UK Governments declare 'climate emergencies', recognising the potentially catastrophic consequences of global warming on ecosystems and human populations. At a national level, Wales has set a target that by 2035 renewables are to generate electricity equal to 100% of its consumption. In terms of delivery against these targets, Wales only added 109MW of new renewable energy capacity in 2023[1], highlighting the urgent need to deliver renewable energy infrastructure.

[1] https://www.renewableuk.com/media/yhxj3n1v/2329-renewable-energy-in-wales-report.pdf

1.2.4 Consequently, there is an urgent need to install new zero-carbon electricity generating stations in Wales and beyond. Carmarthenshire County Council (CCC) declared its own climate emergency in February 2019.

1.3 Development of National Significance (DNS)

1.3.1 The anticipated maximum export capacity of the Proposed Development is 40 MW. Therefore, the Proposed Development falls within the definition of a DNS under regulations 3 and 4 of the Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016.

1.3.2 Heolddu Solar Park Ltd. are intending to apply to the Welsh Ministers for planning permission in respect of a Development of National Significance (DNS), hereafter referred to as the 'Proposed Development', which is:

"The development of a solar farm, including associated ancillary infrastructure and development, temporary laydown areas and landscape and environmental enhancements".

1.4 Purpose and Structure of the Planning Statement

1.4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that the application for the Proposed Development is determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan comprises Future Wales: The National Plan 2040 and the relevant Local Development Plan for the Proposed Development Site.

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

1.4.3 Whilst assessing the impact of the Proposed Development against planning policy, this Planning Statement considers the local and wider benefits which would arise from the construction and operation of the solar farm development. The conclusion reviews the overall acceptability of the Proposed Development by considering the planning balance between the need for renewable energy and any identified impacts.

1.4.4 The Planning Statement is not part of the Environmental Statement (ES) which is also submitted with the application to Planning and Environment Decisions Wales (PEDW). The Proposed Development is considered to be an EIA Development under the Town and County Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the 'EIA Regulations'). An EIA Scoping Direction Request was submitted to PEDW in February 2025, with an EIA Scoping Direction response received in April 2025. As such, an ES has been prepared and will be submitted as part of the application. The Planning Statement makes reference to the ES.

1.5 Planning History

1.5.1 The Site lies within the local planning authority administrative area of CCC. The LPA online records set out the following single planning application of relevance:

Table 1.1: Site Planning History

Application Ref.	Address	Description of Development	Decision	Decision Date	Distance from Proposed Development
W/32171	Land at Bryncoch, Ferryside, SA17 5YD	Proposed 19 MW solar photovoltaic park complete with all necessary inverters, switchgear, transformer, security fence, infra-red cctv, and all necessary ancillary works.	Approved	8 Sept 2015	Partly within the Site (approx 57%).

1.6 Community Engagement

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

1.6.2 PAC is starting on 17 September 2025 and will close on 30 October 2025.

2 The Proposed Development

2.1 Site Location

2.1.1 The Proposed Development Site extends to 81.8 hectares (ha) ('the Site') on land at Maesmawr and Treforris Fawr Farm, within the local authority area of CCC.

2.1.2 The Site lies within a rural, farmed landscape 1 km to the east of Ferryside. Kidwelly is 4km to the south. Smaller settlements within a 5km radius of the Site include the villages of Llandyfaelog, Broadway, Llansaint, Saint Ishmael and Broadlay.

2.2 Site Description

2.2.1 The Site comprises:

- Solar Area West
- Solar Area East
- Underground cable route connecting the two Solar Areas
- Temporary construction access

2.2.2 Solar Area West extends to 54.66 hectares and is south-westerly facing, whilst Solar Area East extends to 25.09 hectares and is south-easterly facing. The underground cable route covers 0.48 hectares and the temporary construction access covers 1.55 hectares.

2.2.3 Solar Area West consists of fifteen fields (1-15), mainly flat and separated from each other by mature hedgerows which also form the Site boundaries. There is a small woodland within the fields. The land is well screened from the surrounding landscape and views by existing mature boundary vegetation. Solar Area East consists of eleven fields (16-26) some of which, due to the surrounding topography and their hillside location, are more visible in the landscape than Solar Area West.

2.2.4 An underground cable route connects the two Areas.

2.3 Proposed Development

2.3.1 The Proposed Development comprises a solar farm, including associated ancillary infrastructure and development, temporary laydown areas and landscape and environmental enhancements on land at Maes Mawr and Treforris Fawr Farm, Ferryside, Carmarthenshire.

Key Components

2.3.2 The Proposed Development comprises the following key components:

- Solar panels and frames
- Inverters and Transformers
- District Network Operator (DNO) and Customer Substation Compound
- Spare Parts Container
- Underground Cabling to connect Solar Area West to the Point of Connection (PoC)

- Internal access tracks
- Highway access, including temporary construction access
- Fencing and CCTV
- Lighting
- Landscape and biodiversity enhancements
- Watercourse crossing to enable access to the substation compound via the DNO access route
- Temporary construction compounds
- Permanent diversion of PRoW 62/12/4
- Surface water drainage

2.3.3 Solar panels and frames Solar panels, also known as photovoltaic (PV) panels , are made up of cells, which convert the light energy from daylight into electrical energy. Bifacial technology has been selected for installation to maximise the yield of the Proposed Development during its operational phase.

2.3.4 The solar panels will be attached to mounting structures which together form PV tables (or modules). The PV tables will be fixed to pile driven galvanised steel posts. The mounting structures are typically made of galvanised steel or aluminium alloy coating and will have a rough matt finish, rather than a polished finish. The base of the mounting structures are thin 'H' or 'C' shapes, thus they have very little impact on the ground and do not require any prior excavation. The mounting structures are driven to a depth of a minimum of 2.0 to 3.0 m depending on ground conditions. When the Site is decommissioned, the mounting structures are simply pulled out from the ground causing minimal ground disturbance.

2.3.5 The frames will allow the panels to be positioned at an angle of between 20-25 degrees from the horizontal axis and orientated to the south, typically the height of a panel will be up to approximately 3.0m to the top of the panel frame on level ground, including up to approximately 0.8m of ground clearance to enable maintenance access and continued sheep grazing below the PV modules.

2.3.6 A solar panel array comprises multiple rows of PV tables running east to west. Between each row of solar panels there would be a gap of approximately 2.0-6.0 m to avoid overshadowing from one solar row to another. A 2.0 m distance is assessed within this ES as a worst-case scenario.

2.3.7 The PV tables will be set back from the Site boundaries to allow for landscaping and screen planting, perimeter security fencing, CCTV coverage, access tracks and maintenance access, as well as to accommodate ecological receptors as necessary. Where access tracks are not proposed between the PV tables and the Site boundaries, the PV tables would be sited a minimum of 15 m from hedgerow boundaries (with larger distances proposed in some areas, up to 20 m and 30 m). PV tables have been sited within the Site to avoid any vegetation removal requirement associated with this element of the Proposed Development.

2.3.8 For further detail, please refer to the following plans:

- Site Layout Plan
- Solar Panel Section

Inverters and Transformers

2.3.9 The inverters are required to convert the Direct Current (DC) electricity generated by the solar panels, to Alternating Current (AC) which is compatible with the wider UK grid network. From the inverters, the electricity flows to a transformer which 'steps-up' the voltage of the electricity from low voltage (LV) to medium voltage (MV) before it reaches the substation.

2.3.10 The Applicant has committed to central inverter technology as a consequence of early noise surveys and modelling. Central inverters would be situated in pairs at regular intervals throughout the Site. The inverters comprise containerised units, measuring up to approximately 3.0 m long (L), 2.0 m wide (W) and 2.2 m high (H) (including the base). 10 inverters are required.

2.3.11 The proposed transformers will be up to approximately 5.4 m (L), 2.2 m (W) and 2.5 m (H) (including the base), these are an 'open air' design, surrounded by a fence and will be finished in green or white colour. The selected technology is a Twin Skid Compact Solution which contains one transformer station and two central inverters in a single compact outdoor skid. Therefore, there are 5 transformers and 10 inverters across the Site. The inverters, transformers and switchgear substations will be sited on a hardcore base.

2.3.12 The transformers will be contained within bunds which will hold a total capacity of greater than 110% of the oil contained in the transformer.

2.3.13 For further information, refer to the following information:

- Site Layout Plan
- Inverter Plan and Sections
- Transformer Plan and Sections

District Network Operator (DNO) and Customer Substation Compound

2.3.14 All electricity from across the solar panels will collect at a substation located within Solar Area East within the DNO and Customer Substation Compound.

2.3.15 The electricity will be fed into the National Grid electricity network at the Point of Connection (PoC) via 132KV cable down droppers to be installed on the existing pylon together with cable anchors and a circuit breakers bay (with disconnectors). The compound will accommodate the DNO substation and the customer substation.

2.3.16 The compound will measure up to approximately 68.5 m long (L) and 26.5 m wide (W). The maximum height of infrastructure within the compound will be up to 10.0 m high (H) where the cable anchors are mounted. The compound will be enclosed by a 2.4 m palisade fence which would typically comprise galvanised steel silver or coated in a matt olive green or brown.

2.3.17 To accommodate the substation compound, ground reprofiling will be necessary to ensure a level platform is achieved. Cut and fill operations will be employed to create a platform and a cut and fill plan has been developed which demonstrates the requirement for a total cut of 1,217 m2 and a total fill of 1,453 m2. Accordingly, there will be no requirement to export surplus material off-site. It is anticipated that fill requirement can be achieved through the use of Site-won materials.

2.3.18 For further information, refer to the following information:

- Site Layout Plan
- 132kV Substation Plan
- 132kV Substation Section
- Perimeter Fenceline and Security Gate Section
- Cut and Fill Assessment

DNO and Customer Control Room

2.3.19 A control room is required to enable remote monitoring and control of the solar farm. There will be one customer control room and one DNO control room both located adjacent (external to) to the DNO and Customer Substation Compound. These buildings will provide daily information/data in relation to the operation of the solar farm. During a solar farm's operation, data communication is vital to facilitate information flow from equipment such as inverters to a central control centre and alert the Applicant and/or the DNO to any potential operational issues with the solar farm or substation.

2.3.20 The customer control room is typically up to approximately 10.3 m (L) x 4.0 m (W) and 3.3 m (H) (including the base). The DNO control room is typically up to approximately 10.4 m (L) x 4.6m (W) and 3.3 m (H) (including the base) and would likely be colour olive green, brown or stone coloured in accordance with regional colour guidelines.

2.3.21 Adjacent to the DNO and Customer Control Room compound will be a standalone communications tower. The communications tower will measure up to approximately 15.2 m (H) (including the base).

2.3.22 For further information, refer to the following information:

- Site Layout Plan
- Customer Control Room Plan and Sections
- DNO Control Room Plan and Sections
- Communications Tower Section
- Perimeter Fenceline and Security Gate

Spare Parts Container

2.3.23 It is proposed that one permanent spares container will be located within the Site to store miscellaneous spare parts. This unit will measure approximately 12.2m (L) x 2.5m (W) x 2.5m (H) and would likely be coloured dark green, mid-to-dark grey or brown.

2.3.24 For further information, refer to the following information:

- Site Layout Plan
- Spare Parts Container Plan and Sections

Cabling

2.3.25 All of the cabling within the Site will be laid underground via surface dug trenches of up to approximately 1m deep and 50cm wide and backfilled. These will utilise existing access tracks wherever practicable, particularly where sensitive habitats or

archaeology are potentially present.

2.3.26 Underground cables will be laid between Solar Area West and Solar Area East to connect Solar Area West to the PoC. It is anticipated that the cable route will be laid via surface dug trenches and backfilled along the public highway. Cabling works will be conducted during the construction working hours.

2.3.27 Road closures may be required to enable the installation of the cable within the highway. Appropriate mitigation are set out in the Outline Construction Traffic Management Plan (CTMP) which include phased installation and/or installation of metal plates. Alternative access routes are also detailed in the Outline CTMP in the event that road closures prevent access to residential properties or farmsteads.

Internal Access Tracks

2.3.28 The on-site access tracks would be required to facilitate the construction of the Proposed Development in addition to repair and maintenance activities during the operational phase. As such, these on-site access tracks would form a permanent feature of the Proposed Development. A dedicated access track is necessary to maintain access to the DNO equipment.

2.3.29 The maximum width of the on-site access tracks would be 4.5 m and the depth excavated would be up to 50 cm. The construction of the on-site access tracks would require the removal and appropriate storage of surface vegetation and topsoil together with the laying of a recycled aggregate sub-base surfaced with crushed stone (suitable engineering material such as high quality crushed aggregate). This surface provides a stable platform, whilst maintaining the drainage properties of the underlying soils.

2.3.30 Internal access tracks have been designed to utilise existing gaps in field boundaries as far as practicable to reduce the need for hedgerow removal.

Highway Access, including Temporary Construction Access

2.3.31 The main strategic route in the vicinity of the Site is the A484 towards Kidwelly routing south from the A48 at Carmarthen. This route provides connection from the M4 at Pontardulais.

2.3.32 Several access points will be used for the construction, operation and maintenance and decommissioning of the Proposed Development. Existing field accesses would be upgraded as part of the Proposed Development to enable access, avoiding the need to establish new gaps within field boundaries. Table 2.1 below details the proposed Site accesses.

Table 2.1: Proposed Site Accesses

Access	Location	Temporary / Permanent
Access 1	Solar Area East (Field 24)	Temporary (construction phase only)
Access 2	Solar Area East (Field 19)	Permanent (construction, operation and decommissioning phases)
Access 3	Solar Area West (Field 11)	Permanent (construction, operation and decommissioning phases)

Access	Location	Temporary / Permanent
Access 4	Solar Area West (Field 13)	Permanent (construction, operation and decommissioning phases)
Access 5	Solar Area West (Field 9)	Permanent (construction, operation and decommissioning phases)

Perimeter Fencing and CCTV

2.3.33 The Proposed Development will be secured by perimeter fencing. This will be deer fencing with wooden posts at circa 3.5 m intervals. The fence will be approximately 2.4 m high with small mammal gates fitted at appropriate points to enable free access into and out of the Site. The perimeter security fencing will function to restrict unauthorised access into the Site and to deter theft or vandalism. Deer fencing has been selected due to its relative visual permeability and minimal impact on natural surface water flows. A minimum distance of 3.0 m will be maintained between the security fencing and the solar arrays. Gates will be located at each of the access points to the highway around the Site. Gates will be galvanised steel and up to approximately 2.4 m high.

2.3.34 CCTV cameras will be positioned around the periphery of the Site. These will be up to approximately 3.0 m high on galvanised steel posts and will be directed into the solar panel areas. They will use passive infra-red technology, thereby avoiding the need for lighting. These will enable remote surveillance of the Site.

2.3.35 For further information, refer to the following information:

- Site Layout Plan
- Perimeter Fenceline and Gate
- CCTV Camera Section

Lighting

2.3.36 During construction, temporary task lighting may be required dependent upon the time of year and weather conditions. This will only be used as necessary and any necessary task lighting will not be illuminated permanently.

2.3.37 Lighting will be installed within the substation compound. Lighting will only be used intermittently either in the event of an emergency or associated with the undertaking of routine maintenance activities which are anticipated to be up to once a month. During standard operation, there is no requirement for the Site to be permanently lit.

Landscape and Biodiversity Enhancements

2.3.38 Landscape and ecological mitigation is embedded in the overall design and has been formulated to reduce potential landscape, visual and wildlife impacts as far as practicable and maximise enhancement of landscape features, landscape character and biodiversity of the Site.

2.3.39 A Landscape and Ecological Design Scheme (LEDS) has been prepared which sets out the following measures:

- Internal and boundary hedgerow reinforcement and reinstatement appropriate to the pastural fields that would improve the Site's existing field structure, enhancing biodiversity and habitats for local wildlife and providing additional screening of the Proposed Development within views and the wider landscape. This measure will be implemented within the majority of fields within both Solar Area East and Solar Area West.
- Grassland enhancement for ground nesting birds during the spring / summer and wading birds during the winter – to comprise lowland meadow with varied sward heights. This measure will be implemented within the majority of fields within both Solar Area East and Solar Area West.
- Woodland edge scrub planting is proposed adjacent to existing areas of established woodland to improve connectivity and integration within the Site. This measure will be implemented within Fields 20 and 26 in Solar Area East.
- Structural woodland planting is proposed for the landscape treatment, where space allows and to help screen views of the solar panels and enhance the wooded character within the Site. This measure will be implemented within Fields 20 and 26 in Solar Area East and Field 13 in Solar Area West.
- New areas of wildflower and tussocky grassland will be created. Various meadow grassland mixes are proposed for different habitat creation that include a tussocky grassland for grazing beneath the solar panels, woodland meadow for the connectivity of areas adjacent to existing woodland, wetland meadow of wet areas and a wildflower meadow.
- Wetland restoration within Solar Area West (Field 24) to provide habitat for wading birds and to provide enhanced carbon sequestration within the Site.

Watercourse Crossing (Field 20 and Field 21)

2.3.40 A suitable crossing solution is necessary to accommodate access via the DNO access track to the substation compound. The access track will route from Field 20 to Field 21 across an existing wooded area and stream. An engineering solution will confirmed prior to the submission of the DNS application, however, at this stage, a commitment has been made to utilising an existing gap between the trees. It is anticipated that the engineering solution will be in the form of a span bridge that will be installed bank-to-bank across the watercourse. The necessary land drainage consent will be obtained prior to the commencement of development.

Temporary construction compounds

2.3.41 The Proposed Development would require two temporary compounds to facilitate construction, one located in Solar Area West (Field 11) and one located in Solar Area East (Field 19). The temporary construction compounds will accommodate site offices, welfare facilities, storage areas, staff and construction vehicle parking and re-fuelling areas.

2.3.42 The construction of the temporary construction compounds would require the removal and appropriate storage of the surface vegetation and topsoil and the laying of a geotextile material surfaced with crushed stone (suitable engineering material such as high quality crushed aggregate). This surface provides a stable platform, whilst maintaining the drainage properties of the underlying soils. The temporary construction compounds would then be surrounded by a security fence (e.g. heras

type fencing) throughout the construction phase. The security fence would measure up to approximately 2 m in height.

2.3.43 Following construction of the Proposed Development, the temporary construction compounds would be reinstated. This would comprise the removal of any temporary structures followed by laying the stored topsoil over the underlying crushed stone. This area would then either be re-seeded using a seed-mix appropriate to the area or, where practicable, reinstated using stored surface vegetation (e.g. turf).

2.3.44 For further information, refer to the following information:

- Site Location Plan – Temporary Construction Compounds

Permanent diversion of PRoW 62/12/4

2.3.45 PRoW 62/12/4 and 62/12/3 route broadly east-west through Solar Area West. PRoW 62/12/1 provides onward connection to the wider network.

2.3.46 As part of the Proposed Development, an approximately 410 m long section of existing PRoW 62/12/4 will be permanently diverted along a different alignment that routes along the northern boundary of Field 4, Field 7 and Field 9.

2.3.47 A PRoW Diversion Order is sought as a secondary consent to permit the proposed re-alignment. The PRoW Diversion Plan shows the length and extent of PRoW 62/12/4 together with its proposed re-alignment.

Surface Water Drainage

2.3.48 A Flood Consequences Assessment and Conceptual Drainage Strategy has been prepared providing detail of surface water management measures. These measures include SuDS techniques include filter strips, swales and attenuation for ancillary features, which are proposed via gravel basins in which infrastructure will be located upon. Access tracks will be constructed out of MOT Type 3 permeable aggregate.

2.3.49 Solar panel arrays are designed in such a way to prevent surface water sheeting off panels and potentially causing erosion. Panels are designed to allow surface water to drip off, landing onto filter strips below.

2.3.50 All ancillary features will be placed on a gravel or concrete sub-base sized to accommodate the 100 year + 20% climate change critical storm event.

3 Policy Context

3.1 Renewable Energy Context

Climate Change Act 2008

3.1.1 The Climate Change Act 2008 received Royal Assent on the 26 November 2008 and introduced legally binding targets on the Secretary of State to reduce the UK's net greenhouse gas emissions by at least 80% from 1990 by 2050.

3.1.2 The Climate Change Act 2008 also established a series of measures to achieve these targets, including the introduction of carbon budgeting, a carbon trading scheme, and the creation of a new Committee on Climate Change.

UK Government Commitment to Net Zero by 2050

3.1.3 On 27 June 2019, the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target will require the UK to bring all greenhouse gas emissions to 'net zero' by 2050, compared with the previous target set within the Climate Change Act (2008) of at least an 80% reduction of emissions by 2050 (against the 1990 baseline).

3.1.4 In support of this target, the Energy white paper: Powering our net zero future (DBEIS, 2020a) was published, setting out the pathway to achieving net zero through the greater reliance on wind and solar energy.

3.1.5 Net Zero 2050 – A Roadmap for the Global Energy Sector (International Energy Agency, 2021) outlines the essential conditions for the global energy sector to reach net-zero carbon dioxide (CO_2) emissions by 2050. The Roadmap calls for scaling up wind and solar technologies during the 2020s, reaching up to 630 GW of solar and 390 GW of wind by 2030, four times the set record levels in 2020.

Welsh Government Declaration of Climate Emergency

3.1.6 On 29 April 2019, the then Environment Minister Lesley Griffiths declared a climate emergency in Wales on behalf of the Welsh Government.

Welsh Government Commitment to Net Zero by 2050

3.1.7 On 9 February 2021, the Welsh Government set out its legal commitment to achieve net zero emissions by 2050.

3.1.8 In May 2024, Welsh Government published the Energy use in Wales: third edition which sets out the vision to meet the equivalent of 100% of Wales' electricity needs from renewable sources by 2035.

Environment (Wales) Act 2016 (as amended)

3.1.9 The Environment (Wales) Act 2016 (as amended) places a duty on the Welsh Ministers to reduce greenhouse gas emissions in Wales by 100% in 2050. The target of net zero emissions (rather than 80% as originally stated in the Act) reflects the Welsh Government's acceptance of the independent CCC recommendation that Wales could achieve a net zero reduction in emissions, which had previously been

considered unfeasible. The Environment (Wales) Act 2016 (as amended) requires Ministers to set a series of interim targets and five-year carbon budgets to achieve the 2050 target. For 2021-26 this stands at 37% reduction compared to the baseline and for 2026-30 this is set at an average of a 58% reduction.

Well-being of Future Generations (Wales) Act 2015

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

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

3.2 National Policy

Future Wales: The National Plan 2040

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

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

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

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

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

3.2.6 Future Wales contains two policies (17 and 18) of specific relevance to the Proposed Development. Policy 9 is also of relevance in terms of maintaining resilient ecological networks and green infrastructure.

3.2.7 **Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure** expresses strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. The policy states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% (later amended to 100% as of Julie James announcement in July 2023) of consumed electricity by renewable means by 2030 to combat the climate emergency.

3.2.8 Policy 17 also expects proposals to describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.

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

1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);
2. there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;
3. there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest and appropriate compensatory measures have been secured);
4. there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;
5. the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;
6. there are no unacceptable adverse impacts on statutorily protected built heritage assets;

7. there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;
8. there are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA-7T);
9. there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;
10. the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;
11. there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.

3.2.10 Policy 18 also requires the cumulative impacts of existing and consented renewable energy schemes to be considered.

3.2.11 Policy 9 – Resilient Ecological Networks and Green Infrastructure requires action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit). It requires the resilience of ecosystems and green infrastructure assets to be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment

3.2.12 In addition to topic-based policies, Future Wales establishes 4 regions and policies appropriate to them. CCC is within the South West region in which it is noted that decarbonisation and responding to the threats of the climate emergency should be central to all regional planning. The Welsh Government wishes to see energy generation, storage and management play a role in supporting the South West economy.

Planning Policy Wales

3.2.13 PPW sets out the land use planning policies of the Welsh Government. PPW Edition 12 was adopted in February 2024. PPW, with the supporting Technical Advice Notes (TANs), Circulars and Policy Clarification letters comprise national planning policy.

3.2.14 Of relevance to this application is the Dear Chief Planning Officer' letter of 2 March 2022 issued by the Minister for Climate Change which provides direction on the considerable weight to be given to best and most versatile agricultural land in determining DNS applications.

3.2.15 PPW requires, at paragraph 1.9, that is should be read as a whole as aspects of policy and their application to a particular development proposal could occur in several parts of the document. It clarifies that Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where 'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

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

"Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest. This means acting in the long term to respect environmental limits and

operating in an integrated way so that resources and/ or assets are not irreversibly damaged or depleted. The polluter pays principle applies where pollution cannot be prevented and applying the precautionary principle ensures cost effective measures to prevent environmental damage." (*our emphasis*)

3.2.17 Paragraph 3.30 of PPW states that "*In 2019 the Welsh Government declared a climate emergency in order to coordinate action nationally and locally to help combat the threats of climate change. The planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes'*.

3.2.18 Section 3 of PPW provides direction on best and most versatile agricultural land. It defines grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile and should be conserved as a finite resource for the future. At paragraph 3.59, it is clear that considerable weight should be given to protecting such land from development, because of its special importance and that land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development. It continues that agricultural land should only be considered for development where 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.

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

3.2.20 Paragraph 5.7.2 acknowledges that overall power demand is expected to increase as a result of growing electrification of transport and heat. When considered against the scope of the targets secured in Future Wales which are limited to electricity consumption only, the extent of the challenge is considerable. PPW highlights that in order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement.

3.2.21 Paragraph 5.7.5 highlights that planning applications for onshore generating projects in Wales which have an installed generation capacity of between 10MW and 350MW [sic] are made directly to the Welsh Ministers under the DNS process and considered under policies in Future Wales.

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

3.2.23 Paragraph 5.7.7 states:

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

3.2.24 In terms of delivery, Paragraph 5.7.7 goes on to state that the planning system should:

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

3.2.25 Paragraph 5.7.8 states an effective electricity grid network is required to fulfil the Welsh Government's renewable and low carbon ambitions. It advocates an integrated approach towards planning for energy developments and additional electricity grid network infrastructure.

3.2.26 PPW states that local planning authorities should ensure "development plan policies are supportive of renewable and low carbon energy development in all parts of Wales, direct developments to the right locations and set out clearly the local criteria against which proposals will be evaluated" (Paragraph 5.9.10).

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

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

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

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

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

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

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

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

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

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

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

3.2.36 Paragraph 6.4.5 sets out the biodiversity and ecosystem resilience duty which requires planning authorities to maintain and enhance biodiversity in the exercise of their functions. This means that development must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. In doing so, planning authorities should have regard to both the DECCA framework; and the step-wise approach.

3.2.37 The DECCA framework comprises of the following attributes:

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

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

3.3 Local Policy

Development Plan

3.3.1 The Site is located within the administrative area of CCC. Therefore, the development plan for the Site for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the CCC Local Development Plan (LDP).

Carmarthenshire County Council Local Development Plan (2006 – 2021) (Adopted December 2014)

3.3.2 The CCC LDP was adopted in December 2014. The Proposals Map indicates that the Site is not allocated for any specific use.

3.3.3 The LDP has a number of Strategic Policies relevant to the proposal and summarised below.

3.3.4 **SP1 Sustainable Places and Spaces** states that proposals for development will be supported where they reflect sustainable development and design principles by (inter alia):

- Distributing development to sustainable locations in accordance with the settlement framework, supporting the roles and functions of the identified settlements;
- Promoting, where appropriate, the efficient use of land including previously developed sites;
- Utilising sustainable construction methods where feasible; and
- Protect and enhance the area's biodiversity value and where appropriate, seek to integrate nature conservation into new development.

3.3.5 **SP2 Climate Change** seeks to ensure that development proposals respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change. In particular, proposals should adhere to the waste hierarchy; promote the efficient consumption of resources; avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures such as SUDS and flood resilient design; Promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy and incorporate appropriate climate responsive design solutions.

3.3.6 **SP9 Transportation** outlines that provision is made to contribute to the delivery of an efficient, effective, safe and sustainable integrated transport system. Of relevance to this proposal is the use of locational considerations for significant trip generating proposals, with design and access solutions within developments to promote accessibility by non car modes of transport.

3.3.7 **SP11 Renewable Energy & Energy Efficiency** states that development proposals which incorporate energy efficiency measures and renewable energy production technologies will be supported in areas where the environmental and cumulative impacts can be addressed satisfactorily. Such developments will not cause demonstrable harm to residential amenity and will be acceptable within the landscape. Each proposal will be assessed on a case-by-case basis.

3.3.8 **SP13 Protection and Enhancement of the Built and Historic Environment** requires development proposals to preserve or enhance the built and historic

environment of the County, its cultural, townscape and landscape assets (outlined below), and, where appropriate, their setting. Proposals relating to the following will be considered in accordance with national guidance and legislation.

- Sites and features of recognised Historical and Cultural Importance;
- Listed buildings and their setting;
- Conservation Areas and their setting;
- Scheduled Ancient Monuments and other sites of recognised archaeological importance.

3.3.9 **SP14 Protection and Enhancement of the Natural Environment** seeks to ensure that developments reflect the need to protect, and wherever possible enhance the County's natural environment. All development proposals should be considered in accordance with national guidance/legislation and the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas, including those outlined below:

- Statutory designated sites including Ramsar sites, SPAs, SACs, SSSIs and National Nature Reserves;
- Biodiversity and Nature Conservation Value, including protected species and habitats of acknowledged importance as well as key connectivity corridors and pathways;
- Regional and Locally important sites (and their features) including Local Nature Reserves and RIGS;
- Areas of identified Landscape and Seascape quality; (including SLAs)
- Features which contribute to local distinctiveness, nature conservation value or the landscape;
- The Open Countryside;
- The best and most versatile agricultural land;
- Natural assets: including air, soil (including high carbon soils) controlled waters and water resources.

3.3.10 **SP17 Infrastructure** directs development to locations where adequate and appropriate infrastructure is available or can be readily provided. Renewable energy generation and associated utility connections will be encouraged, in appropriate locations, subject to other Plan policies. Proposals for ancillary developments to the utilities infrastructure will be permitted where:

- They have regard to their setting;
- Incorporate landscaping;
- Do not conflict with the areas built, historic, cultural and nature conservation and landscape qualities.

3.3.11 The LDP also has a number of specific policies relevant to the proposal and summarised below.

3.3.12 **Policy GP1 Sustainability and High Quality Design** permits development proposals where they accord with the following (inter alia):

- It conforms with and enhances the character and appearance of the site;

- It incorporates existing landscape or other features, takes account of site contours and changes in levels;
- It would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community;
- It retains, and where appropriate incorporates important local features (including buildings, amenity areas, spaces, trees, woodlands and hedgerows) and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity;
- An appropriate access exists or can be provided;
- It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;
- It has regard for the safe, effective and efficient use of the transportation network

3.3.13 **Policy TR1 Primary and Core Road Networks** states that proposals which do not restrict traffic movement and/or compromise the safety of the primary road network and core network will, where appropriate be supported.

3.3.14 **Policy TR2 Location of Development – Transport Considerations** states that proposals which have a potential for significant trip generation will be permitted where (inter alia):

- It is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals;
- Travel Plans have been considered and where appropriate incorporated.

3.3.15 **Policy TR3 Highways in Developments - Design Considerations** requires development proposals to include access standards reflective of the relevant Class of road and speed restrictions including visibility splays and design features and calming measures necessary to ensure highway safety and the ease of movement is maintained, and where required enhanced; and provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run off from the highway.

3.3.16 **Policy EQ1 Protection of Buildings, Landscapes and Features of Historic Importance** states that proposals for development affecting landscapes, and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.

3.3.17 **Policy EQ4 Biodiversity** states that proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, (namely those protected by Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006 [now s.7 Environment (Wales) Act 2016] and UK and Local BAP habitats and species and other than sites and species protected under European or UK legislation) will not be permitted, except where it can be demonstrated that:

- The impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements;
- There are exceptional circumstances where the reasons for the development or land use change clearly outweighs the need to safeguard the biodiversity

and nature conservation interests of the site and where alternative habitat provision can be made in order to maintain and enhance local biodiversity.

3.3.18 **Policy EQ5 Corridors, Networks and Features of Distinctiveness** sets out that Proposals for development which would not adversely affect those features which contribute local distinctiveness/qualities of the County, and to the management and/or development of ecological networks (wildlife corridor networks), accessible green corridors and their continuity and integrity will be permitted and provision for the retention and appropriate management of such features will be supported.

3.3.19 **Policy RE3 Non-wind Renewable Energy Installations** sets out that large scale schemes located outside defined Development Limits may be permitted in exceptional circumstances, where there is an overriding need for the scheme which can be satisfactorily justified, and the development will not cause demonstrable harm to the landscape. Proposals that would cause demonstrable harm to the landscape, visual impact, noise, ecology, or ground and surface water as a result of the cumulative effect of renewable energy installations will not be permitted.

3.3.20 **Policy EP1 Water Quality and Resources** states that development will be permitted where they do not lead to a deterioration of either the water environment and/or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality. Watercourses will be safeguarded through biodiversity/ecological buffer zones/corridors to protect aspects such as riparian habitats and species; water quality and provide for flood plain capacity.

3.3.21 **Policy EP2 Pollution** requires development proposals to seek to minimise impacts of pollution. New developments will be required to demonstrate that they do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas (permitted developments may be conditioned to abide by best practice); do not cause a deterioration in water quality; and ensure that light and noise pollution are where appropriate minimised.

3.3.22 **Policy EP3 Sustainable Drainage** requires development proposals to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated.

Carmarthenshire County Council Replacement Local Development Plan 2018 – 2033

3.3.23 CCC are currently preparing a Replacement LDP (RLDP) to cover the period 2018 to 2033. The RLDP is currently undergoing examination and CCC is currently undertaking consultation on additional housing sites, as requested by PEDW.

3.3.24 The RLDP is unlikely to be adopted prior to the submission of this planning application. However, it might be in place for the determination of the application and as such, and whilst it is not yet a material planning consideration, we set out the emerging relevant policies for context and completeness.

3.3.25 Policies within the 2nd Deposit Revised RLDP of relevance to the Proposed Development are set out below.

3.3.26 **SP 9: Infrastructure** states that development will be directed to sustainable locations where the infrastructure, services and facilities considered necessary to deliver and support the development proposal are available or can be provided.

3.3.27 **SP 12: Placemaking and Sustainable Places** states that to facilitate sustainable development, new development must acknowledge local distinctiveness and sense of place and be resilient to climate change and deliver net benefits for biodiversity.

3.3.28 **PSD1: Effective Design Solutions: Sustainability and Placemaking** seeks to ensure that development proposals demonstrate effective delivery of site-specific design and sustainability objectives. Development shall deliver quality design solutions which are appropriate to the specific site, local area, and nature of development.

3.3.29 **PSD3: Green and Blue Infrastructure Network** requires development proposals to demonstrate effective Green and Blue Infrastructure (GBI) design solutions.

3.3.30 **PSD4: Green and Blue Infrastructure – Trees, Woodlands and Hedgerows** states that development proposals shall (inter alia) maximise retention, protection, and integration of existing trees, woodlands and hedgerows; and deliver additional planting of trees, woodlands, and hedgerows appropriate to the site and development type that will deliver both long term landscape benefits and net benefits for biodiversity.

3.3.31 **PSD5: Development and the Circular Economy requires** applicants to demonstrate, via the submission of a natural materials management plan, how the generation of waste has been minimised and any waste generated managed in order to keep resources in use for as long as possible.

3.3.32 **PSD11: Noise Pollution** states that proposals that will lead to a detrimental impact from noise pollution will be permitted where it can be demonstrated that appropriate mitigation measures will be implemented, and incorporated into the development to minimise the adverse effects.

3.3.33 **PSD12: Light and Air Pollution** states that proposals that will lead to a detrimental impact from light and/or air pollution will be permitted where it can be demonstrated that appropriate mitigation measures will be implemented, and incorporated into the development to minimise the adverse effects.

3.3.34 **Strategic Policy – SP 14: Maintaining and Enhancing the Natural Environment** states that development proposals must protect and enhance the County's natural environment.

3.3.35 **NE2: Biodiversity** requires proposals to maintain and enhance biodiversity in accordance with Section 6 of the Environment (Wales) Act 2016. Development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity.

3.3.36 **NE3: Corridors, Networks and Features of Distinctiveness** expects proposals to maintain and enhance ecological corridors, networks, and features of distinctiveness. Proposals which include provision for the retention and appropriate management of such features will be supported. Development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity.

3.3.37 **Strategic Policy – SP 15: Protection and Enhancement of the Built and Historic Environment** states that development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets, and, where appropriate, their setting. Proposals will be expected to promote high quality design that reinforces local character and respects and enhances the cultural and historic qualities of the plan area.

3.3.38 **BHE2: Landscape Character** seeks to ensure that proposals should relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained.

3.3.39 **Strategic Policy – SP 16: Climate Change** supports proposals that respond, adapt, increase resilience, and minimise the causes and impacts of climate change.

3.3.40 **CCH2: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas** supports proposals for renewable and low carbon energy development and associated infrastructure, provided they accord with the following:

- The development will not have an unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure;
- The development will not have an unacceptable impact upon areas designated for their landscape value;
- The development will not have an unacceptable impact on roads, rail, or aviation safety; electromagnetic interference to communications installations, radar or air traffic control systems, emergency services communications or other telecommunications systems;
- Proposals will not cause an unreasonable risk or nuisance to, and impact upon the amenities of, nearby residents or other members of the public, and will not result in unacceptable loss of public accessibility to the area;
- Proposals should be accompanied with appropriate mitigation measures where required, including satisfactory restoration of land following decommissioning.

3.3.41 **CCH4: Water Quality and Protection of Water Resources** seeks to ensure that proposals must make efficient use of water resources and, where appropriate, contribute towards improvements in water quality. Where appropriate, SuDS must be implemented with approval required through the Sustainable Drainage Approval Body (SAB). Proposals will be supported if they promote the safeguarding of watercourses through ecological buffer zones or corridors.

3.3.42 **CCH5: Flood Risk Management and Avoidance** states that proposals for development located within areas of identified flood risk will only be permitted in exceptional circumstances and they should seek to incorporate effective and environmentally sympathetic flood risk mitigation measures, such as SuDS

3.3.43 **CCH7: Climate Change – Forest, Woodland, and Tree Planting** sets out that support will be given to proposals which seek the creation and protection of new (or the enhancement of existing) woodland, forests, tree belts and corridors, and where they promote the delivery of the national and local decarbonisation targets.

3.3.44 **TRA5: Highways and Access Standards in Development** supports proposals that incorporate the necessary access standards; include appropriate visibility splays and design features necessary to ensure highway safety and that the ease of movement is maintained; and do not generate unacceptable levels of traffic which has a detrimental impact on the surrounding road network, highway safety, or would cause significant harm to the amenity of residents.

Supplementary Planning Guidance

3.3.45 The adopted LDP is supported by a range of Supplementary Planning Guidance (SPG) documents.

3.3.46 Of relevance to this Proposed Development is the SPG on 'Wind and Solar Energy' adopted in June 2019. Others that are of particular topic-specific relevance include the following and these are referenced and taken into consideration as relevant to the individual ES topic chapters or technical assessments. These include:

- Archaeology and Development
- Nature Conservation and Biodiversity
- Placemaking and Design

Wind and Solar Energy SPG

3.3.47 Chapter 6 of the SPG deals with solar development and essentially takes each of the core ES topics that one would expect to see form part of an assessment that supported a major planning application for a solar farm development. It deals with matters of landscape and visual impact and glint and glare and offers guidance on siting and layout, as well as then moving through other topics that cover ecology, noise, historic environment, drainage, access and security and Public Rights of Way.

3.3.48 As with the other relevant SPGs, the advice set out in 'Wind and Solar Energy' has been taken into consideration in the design evolution and in the EIA process of preparing the topic-specific assessments.

4 Policy Assessment

4.1 Introduction

4.1.1 This section provides an assessment of the key matters considered for the Proposed Development. It considers the work undertaken and presented in the ES and demonstrates the acceptability of the Proposed Development in planning terms.

4.1.2 The assessment of the planning merits of the Proposed Development is focussed on the following key matters:

- Principle of the Proposed Development
- Key benefits of the Proposed Development
- Historic Environment
- Landscape and Visual
- Biodiversity
- Hydrology, Hydrogeology and Ground Conditions
- Highways and Traffic
- Noise
- Climate Change
- Soils

4.2 The Principle of the Proposed Development

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

4.2.2 PPW is also clear in its support for the principle of renewable energy development, primarily through Future Wales and PPW at a national level, and the CCC LDP (and emerging RLDP) together with associated policy at local level.

4.2.3 The Proposed Development will have an installed generating capacity of 40 MW, which will be a significant contribution to the generation of low carbon electricity in Wales, and as such is strongly supported in principle by Future Wales and PPW due to its role in tackling the climate emergency and increasing energy security.

4.2.4 Policies SP2, SP11 and SP17 of the CCC LDP and Policies SP16 and CCH2 of the CCC RLDP support the development of renewable energy projects in principle.

4.3 Key Benefits of the Proposed Development

4.3.1 The Proposed Development will yield many benefits including:

- The Proposed Development will help contribute to greater energy security in Wales and the UK, and less reliance on importing costly gas from abroad.

- The Proposed Development will generate enough affordable clean electricity to meet the annual equivalent needs of approximately 10,770[2] homes and result in an approximate saving of 9,961[3] tonnes of CO2 per annum.
- The application will significantly improve biodiversity in the local area including structural woodland planting, woodland edge scrub planting, new areas of wildflower and tussocky grassland, new hedgerows and gapping up of existing hedgerows and wetland restoration to improve diversity, extent and connectivity of habitats and species.
- The Proposed Development will facilitate enhanced access to the countryside through PRoW improvements.
- A community benefit fund will be established to help develop, create and fund activities, projects and initiatives to bolster local communities and industries.

4.4 Environmental Impact of the Proposed Development

Cultural Heritage

4.4.1 Policy 18 of Future Wales affords a presumption in favour of renewable energy development provided 'there are no unacceptable adverse impacts on statutorily protected built heritage assets'. Similarly, Policies SP13 and EQ1 of the CCC LDP seek to protect and enhance Carmarthenshire County Council's built and historic environment.

4.4.2 ES Volume 1, Chapter 8: Cultural Heritage provides an assessment of the impact of the Proposed Development on both designated and non-designated historic assets, including buried archaeological remains; historic buildings, structures and monuments; and historic landscapes.

4.4.3 A large part of Solar Area West is located in the Tywi Valley Registered Historic Landscape (RHL) but does not lie within any of its defined Historic Landscape Character Areas (HLCA), with Croesyceilog HLCA situated approximately 300m to the east of the Site. The Site is located over 700m north of the Taf and Tywi Estuary RHL, but is partly within the Allt Hilltop HLCA, one of its defined HLCAs. A detailed assessment of the impact of the Proposed Development on Historic Landscapes is provided at Volume 3, Appendix 8.2: ASIDOHL2, which confirms that the overall significance of the impact of development on Taf and Tywi Estuary Registered Historic Landscape (RHL) is 'slight', and for Tywi Valley Estuary RHL 'very slight'.

4.4.4 The layout of the Proposed Development ensures the largest components (substation) are away from key views from and towards designated historic assets. Internal and boundary hedgerow reinforcement is proposed, as well as additional planting. The need to remove the hedgerows to facilitate access has been also minimised (by the use of existing field entrances) which ensures designated historic

[2] Year one output has been calculated by multiplying the proposed development's generation capacity (40 MW), by total hours in a year (8,766 accounting for leap years), then applying a capacity factor for solar PV schemes operating in the UK on an unchanged configuration basis (11.06% (average of 2012-2023 data)) (DESNZ, 2024). Year one output was then divided by 3,600 kWh, (annual electricity consumption for an average UK household) (DESNZ, 2023), providing an estimated number of homes powered per annum.

[3] This saving is calculated by multiplying estimated total output in year 1 (38,769 MWh), by the UK's current grid average factor, inclusive of Well-to-tank (WTT), and WTT transmission and distribution (T&D) (DESNZ, 2024).

assets and historic landscapes would not experience significant effects as a result of the Proposed Development.

4.4.5 A detailed overview of archaeological potential within the Site is included within Volume 3, Appendix 8.1: Cultural Heritage Desk Based Assessment. Volume 3, Appendix 8.3: Geophysical Survey Report presents the findings of a geophysical survey of the Site undertaken in November 2024; the key findings are numerous linear boundaries and a trackway apparently predating the modern/post-medieval road/field systems. Further pre-determination evaluation is proposed as set out in Volume 3, Appendix 8.4: Evaluation Written Scheme of Investigation (WSI).

4.4.6 The Site layout has been designed to ensure key areas of impact (such as access tracks, substation, inverters/transformers or construction compounds) avoid areas of known archaeological remains where possible. It is proposed that archaeological remains are to be preserved in situ or subject to minimal (piling) impacts only with this measure secured by the Outline Construction Environmental Management Plan (CEMP).

4.4.7 Overall, it is concluded that there would be negligible cultural heritage related impacts arising from the Proposed Development. Accordingly, the Proposed Development complies with Policy 18 of Future Wales, Policies SP13 and EQ1 of the CCC LDP and Policy SP15 of the CCC RLDP.

Landscape and Visual

4.4.8 Policies SP14 and GP1 of the CCC LDP seek to protect and enhance the County's natural environment, including landscapes; existing landscape features should be incorporated. Future Wales affords significant value to landscape features, particularly on the setting of National Parks and Areas of Outstanding Natural Beauty.

4.4.9 ES Volume 1, Chapter 5: Landscape and Visual Resources provides an assessment of the impact of the Proposed Development on landscape and visual resources. The Site does not lie within a nationally or locally designated landscape, it is considered that the Site is of good quality and typical of the landscape within the wider Study Area.

4.4.10 In terms of landscape effects, it is concluded that the Proposed Development will not result in effects greater than moderate adverse (which is judged as not significant). These moderate effects are identified to affect the Site itself during construction (reducing to minor adverse during operation) as well as Representative Viewpoint 1 (View looking northeast from local road C2075) and Representative Viewpoint 5 (View looking south from local road C2074) during Winter Year 1, reducing to negligible to minor adverse at Summer Year 15.

4.4.11 In terms of visual effects, a series of 15 Representative Viewpoints have been identified within the study area. The assessment of the likely significant effects of the Proposed Development upon these representative viewpoints is not anticipated to be greater than minor adverse (not significant). The assessment of the likely significant effects of the Proposed Development upon other road users and PRoWs also determines that the effect will be no greater than moderate adverse (not significant).

4.4.12 Future Wales Plan Policy 18 states that proposals for renewable energy projects will be permitted subject to there being '*no unacceptable adverse visual impacts on nearby communities and individual dwellings*'. An assessment of the likely significant effects of the Proposed Development on nearby communities and individual dwellings is also provided and supported by a Residential Visual Amenity Assessment (RVAA).

4.4.13 In terms of glint and glare, ES Volume 3, Appendix 5.3: Glint and Glare Assessment concludes that no significant impacts are predicted on surrounding road safety and aviation activity associated with Pembrey Airport. In respect of residential properties, the Glint and Glare Assessment concludes that with implementation of the LEDS, there is only a low impact on a small number of residential properties.

4.4.14 Future Wales Plan Policy 18 also states that, '*the cumulative impacts of existing and consented renewable energy schemes should also be considered*.' Cumulative effects are considered within ES Volume 1, Chapter 5: Landscape and Visual Resources. Overall, it is considered that the Proposed Development will not result in any significant cumulative effects on landscape character or visual amenity.

4.4.15 The proposed re-alignment of PRoW 62/12/4 will enhance the existing route which is currently inaccessible due to overgrown vegetation and runs proximal to slurry tanks associated with Maes Mawr Farm. The proposals have been developed in liaison with CCC's PRoW Officers and will allow for increased public usage of the path.

4.4.16 ES Volume 1, Chapter 5: Landscape and Visual Resources demonstrates compliance with national and local planning policy including Policies 17 and 18 of Future Wales as well as the relevant LDP policies. Accordingly, there is no reason in terms of landscape and visual impact that the Proposed Development should not be permitted.

Biodiversity

4.4.17 Policy 18 of Future Wales is clear that development will be considered acceptable as long as *'the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity'*. This is further supported in PPW 12 where policy seeks to *'reverse the decline in biodiversity and increase the resilience of ecosystems*' and recognises that if development does not to take place and biodiversity is impacted *'the planning system should ensure that overall, there is a net benefit for biodiversity and ecosystem resilience'*. A Green Infrastructure Strategy, which includes the necessary habitat creation, restoration and enhancement measures has been prepared as part of the planning application.

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

4.4.19 Policies SP1, SP14, EQ4 and EQ5 of the CCC LDP In addition, the CCC RLDP requires consideration of Green and Blue Infrastructure (Policies PSD3 and PSD4) and supports development that seek the creation and protection of new (or the enhancement of existing) woodland, forests, tree belts and corridors, and where they promote the delivery of the national and local decarbonisation targets (Policy CCH7).

4.4.20 ES Volume 1, Chapter 6: Biodiversity provides an assessment of the impact of Proposed Development on internationally designated sites, ancient woodland, hedgerows, watercourses, commuting and foraging bats, otter, water vole, hazel dormouse, breeding birds and wintering birds.

4.4.21 The results of the desk studies, habitat survey and protected and/or notable species assessment highlighted the potential for the Site to support several protected or notable species. The design of the Proposed Development has been informed by the findings of the assessment and has incorporated buffers and careful positioning of infrastructure to avoid impacts on important ecological features as mitigation by

design. This has enabled avoidance of valuable habitats and minimisation of habitat loss. Habitat creation, restoration and enhancement measures as part of the Landscape and Ecological Design Scheme, including new and enhanced hedgerows, enhanced grasslands, restoration of waterbodies and watercourses, woodland edge and shrub planting. In addition, construction will be undertaken in accordance with the measures contained in the outline CEMP.

4.4.22 With the proposed mitigation and biodiversity enhancement measures to be secured for the construction, operation and decommissioning phases of the Proposed Development, no significant adverse effects are likely to occur on ecology receptors and an overall net benefit for biodiversity would be delivered. In fact, it is concluded that there will be significant beneficial effects as a result of habitat creation, restoration and enhancement measures in respect of foraging and commuting bats, hazel dormouse (in the long term).

4.4.23 ES Volume 1, Chapter 6: Biodiversity demonstrates compliance with national and local planning policy including Policies 17 and 18 of Future Wales as well as the relevant LDP policies. Accordingly, there is no reason in terms of ecology or ornithology that the Proposed Development should not be permitted.

Hydrology, Hydrogeology and Ground Conditions

4.4.24 Policies EP1, EP2 and EP3 of the CCC LDP seek to ensure that development does not result in deterioration of the water environment and incorporates effective and environmentally sympathetic flood risk mitigation measures. Policy EP6 of the CCC LDP requires consideration of land instability.

4.4.25 An assessment of the flood risk to the Proposed Development and the potential impact of the Proposed Development on flood risk elsewhere is provided at ES Volume 3, Appendix 10.1: Flood Consequences Assessment & Conceptual Drainage Strategy. Volume 3, Appendix 10.1: Flood Consequences Assessment & Conceptual Drainage Strategy provides the 'Drainage Statement' for the purposes of TAN15.

4.4.26 The Flood Consequences Assessment & Conceptual Drainage Strategy concludes that the Proposed Development is at 'low' risk of flooding from all sources, and with appropriate surface water and soil management measures, would cause negligible effects on the existing hydrological regimes. Accordingly, appropriate measures are secured in Volume 3, Appendix 4.4: Outline CEMP and Volume 3, Appendix 7.2: Outline Soil Management Plan.

4.4.27 ES Volume 1, Chapter 10: Hydrology, Hydrogeology and Ground Conditions provides an assessment of the impact of the deterioration of waterbodies during the construction, operation and maintenance, and decommissioning phases of the Proposed Development. The assessment concludes that with the implementation of the mitigation measures embedded as part of the Proposed Development, there will be no likely significant effects.

4.4.28 Geohazards are assessed within Volume 3, Appendix 10.2: Geoenvironmental Desktop Study. The potential for any significant land instability has not been identified.

4.4.29 The assessment set out above demonstrates compliance with national and local planning policy including the step-wise approach (as set out in PPW) and the relevant LDP policies. Accordingly, there is no reason in terms of hydrology, hydrogeology or ground conditions that the Proposed Development should not be permitted.

Highways and Traffic

4.4.30 Policy 18 of Future Wales requires that development will be considered acceptable as long as '*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*'. Technical Advice Note 18: Transport (TAN 18) sets out transport issues to consider when assessing planning applications.

4.4.31 Policies SP9 and TR3 of the CCC LDP seek to ensure that highway safety and the ease of movement is maintained.

4.4.32 The Site will be accessed in accordance with the Access Strategy (ES Volume 3, Appendix 4.2: Access Strategy) which demonstrates that safe access and egress can be achieved. The preliminary access designs have been prepared in accordance with the relevant standards for highways safety. Provision is made for access to the Site during the construction, operation and decommissioning phases of the Proposed Development.

4.4.33 Access during the construction period will be controlled through the implementation of the Outline Construction Traffic Management Plan (CTMP) (ES Volume 3, Appendix 4.3) which provides detailed information on expected construction vehicle movements and vehicle types, journey considerations for construction and maintenance staff, the suitability and details of the proposed transport route, information on the traffic management measures to be implemented, and details the construction working hours and duration of works. The Transport Statement (Volume 3, Appendix 4.1) concludes that the construction trip generation will not have an adverse impact on the surrounding highways network.

4.4.34 During operation, the facility is expected to have no full-time equivalent staff with access required only for staff to undertake inspection, maintenance, repairs and make adjustments. For the majority of the time, the facility would be controlled remotely. The Transport Statement (Volume 3, Appendix 4.1) concludes that the associated vehicle movements will have a negligible impact on the surrounding highway network.

4.4.35 Overall, it is considered that there would be no significant transport and highway related impacts arising from the Proposed Development. The Proposed Development demonstrates compliance with PPW, TAN18 and Policy 18 of Future Wales. There is therefore, no reason in terms of traffic or transport that the Proposed Development should not be permitted.

Noise

4.4.36 Policy 18 of Future Wales requires that development will be considered acceptable as long as '*there are no unacceptable adverse impacts by way of noise'*. TAN 11 (Noise) sets out how the planning system can be used to reduce the adverse impact of noise. Policies EP2 and RE3 of the CCC LDP seeks to minimise the impacts of noise pollution.

4.4.37 The layout of the Proposed Development has been designed, such that all noise generating plant is optimally located and distributed throughout the Site in order to ensure acoustic effects at sensitive receptors are minimised. This approach, coupled with the adoption of appropriate plant selections/specifications, effectively designs out the potential for operational noise effects of the Proposed Development.

4.4.38 ES Volume 1, Chapter 9: Noise provides an assessment of the effects of the Proposed Development on noise sensitive receptors (NSRs) as a result of the Proposed

Development. A construction noise level summary is presented in ES Volume 1, Chapter 9: Noise and considers a statistically representative selection of NSRs which lie directly adjacent to the Site boundary. It concludes that the predicted noise levels will not exceed the adopted limit (Category A 6a dB(A)) which equates to a short-term, temporary effect, which is not significant.

4.4.39 Overall, it is considered that the Proposed Development demonstrates compliance with PPW, TAN 11 and Policy 18 of Future Wales. There is therefore, no reason in terms of noise that the Proposed Development should not be permitted.

Climate Change

4.4.40 As a renewable energy development, climate change mitigation is an inherent aim of the Proposed Development. As set out herein, both national and local legislation and policy are supportive of the development of renewable energy infrastructure to deliver clean energy and meet net zero targets.

4.4.41 As set out in this Planning Statement, the environmental effects of the Proposed Development have been avoided, minimised, mitigated or compensated for in accordance with local and national planning policy and legislation. Approval of the DNS application will allow the benefits of the Proposed Development in terms of tackling climate change to be realised.

Soils

4.4.42 As set out above, PPW affords protective provision in respect of BMV agricultural land. Whilst directing development away from BMV land, it recognises that where 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, there may be an overriding need for development.

4.4.43 The Solar Energy UK publication 'Solar Farms and Agricultural Land' (June 2024)[4] provides useful context for the consideration of this application. The publication recognises that given the temporary and fully reversible nature of solar farm developments, which do not lead to the loss or deterioration of underlying soil quality, and can be maintained in agricultural use, the use of agricultural land will not compromise national agricultural resource. It recognises that whilst planning policy seeks to direct solar farm development away from higher grade agricultural land, the locational constraints required for development of solar farms means that such an objective is not always possible, especially when considering other environmental considerations and availability of land.

4.4.44 Detailed Agricultural Land Classification (ALC) Survey (Volume 3, Appendix 7.1) has confirmed that the Site contains a mixture of ALC grades 3a "good" (comprising 49% of the Site) and 3b "moderate" (comprising 51% of the Site). There is a climatic limitation in this area, and land cannot be classified higher than Subgrade 3a.

4.4.45 Volume 1, Chapter 3: Design Evolution and Alternatives of the Environmental Statement sets out the detailed site assessment exercise that has been undertaken which demonstrates that the entire search area, applied for reasons of connection to the national grid, contains predominantly Grade 3a and Grade 3b agricultural land.

[4] https://solarenergyuk.org/wp-content/uploads/2024/06/FactSheet-Solar-Farms-and-Agricultural-Land-2024.pdf

Notwithstanding, the methodology contained within Welsh Government Practice Guidance - Planning for Renewable and Low Carbon Energy - A Toolkit for Planners 2015 edition has been used to consider reasonably alternative sites within the search area. Factors including existing infrastructure constraints, inability to meet the required generation capacity and other environmental and heritage constraints limited all alternative sites. Notable constraints that also apply to the Proposed Development posed comparable or greater constraints to the alternative sites. Of consideration included the Carmarthenshire Bay and Estuary Special Landscape Area (SLA), the Taf and Tywi Estuary and the Tywi Valley Registered Historic Landscapes and the Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd Special Area of Conservation. Of the alternative sites considered, none performed significantly better in respect of the quantum of BMV agricultural land present.

4.4.46 As demonstrated, avoidance of BMV agricultural land by site selection has not been feasible, specifically in terms of proximity of grid connection. In accordance with the stepwise approach set out in PPW, avoidance by design has been achieved through removing infrastructure from areas of the Site that contained BMV agricultural land. The outcome is a commercially viable scheme, that has avoided all of the relevant environmental constraints and contains 17 ha of BMV agricultural land within the fence line. Further detail is provided in Volume 1, Chapter 3.

4.4.47 The Proposed Development includes measures to carefully manage soils within the Site, with activities controlled through a Soil Management Plan (SMP). An outline SMP accompanies the application (Volume 3, Appendix 7.1).

4.4.48 In accordance with the Scoping Direction provided by PEDW, Volume 1, Chapter 7: Soils, provides an assessment of the impact of the Proposed Development upon agricultural land of BMV quality, long-term or permanent damage to soil structure and farm businesses. In respect of BMV agricultural land, the chapter identifies that the majority of the Site accommodates solar panels, the installation of which is a swift process and has little impact on the soil because the piles are inserted into the soil with no removal of soil and the soil is simply pushed aside by the pile. The assessment identifies that those activities that have the greatest impact on BMV agricultural land are the establishment of internal access tracks (resulting in a long-term, but temporary impact) and the establishment of the DNO access track and other fixed infrastructure (assumed to be the DNO substation). The chapter acknowledges the quantum of BMV agricultural land within the Site but importantly distinguishes between the quantum of BMV agricultural land present within the Site and that which will be affected by the Proposed Development. The latter, it identifies to be limited to less than 1 hectare:

Table 4.1: Quantum of BMV agricultural land affected by the Proposed Development

Impact	Subgrade 3a
Temporary (albeit long-term) disturbance of soil resource to accommodate internal access tracks).	0.4 hectare
Permanent loss of soil resource to accommodate fixed equipment and the DNO access track.	0.5 hectare
Total	**0.9 hectare**

4.4.49 The chapter identifies that there will not be a significant effect on agricultural output. Currently the Site is used for producing winter forage (mostly silage), grazing cattle and grazing sheep. With the PV modules in place the solar farm will be used for grazing sheep. There will be an increase in land area managed for biodiversity, but the proposals for the Sustainable Farming Scheme for 2026 require 10% of all farms to be managed as suitable habitat, so this will be a change that will occur in any event.

4.4.50 Notwithstanding the quantum of BMV agricultural land present within the Site, the provisions of PPW have been met by virtue of the fact that an appropriate site selection exercise has been undertaken, demonstrating that it is not feasible for the Proposed Development to be located upon an alternative site of lower ALC.

4.4.51 In the recent Ministerial decision in respect of the Alaw Mon Solar Farm (DNS/ 3274702), Welsh Government's stance that renewable energy applications should not necessarily be treated as those for which an overriding need is assumed. It is established that rather, there should be a nuanced, case specific consideration.

4.4.52 The assessment contained within Volume 1, Chapter 7: Soils, together with the measures set out in Volume 3, Appendix 7.2: Outline SMP demonstrates that the Proposed Development will not result in a likely significant effect greater than minor adverse (not significant). The detail contained within Volume 3: Design Evolution and Alternatives and within this Planning Statement demonstrate that a suitable and thorough site selection exercise has been undertaken. With the urgent need to deliver renewable energy infrastructure to contribute towards achieving Welsh Government legislative requirements and the minor adverse effects identified in respect of BMV agricultural land and agricultural output in the context of this application, the overriding need for the Proposed Development is clear.

4.5 Assessment against Well-being of Future Generations Act

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

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

- (A Prosperous Wales) – investment in renewable and low carbon energy sources.
- (A Resilient Wales) – renewable energy generation.
- (A Healthier Wales) – reduction in emissions and air pollution as a result of generating energy from non-carbon sources. Greater distribution of our economic wealth can also help alleviate poverty which is a key determinant of health.
- (A More Equal Wales) – promotion of sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.
- (A Wales of Cohesive Communities) – created by people who have access to fulfilling work.

- (A Wales of Vibrant Culture and Thriving Welsh Language) – supported by the provision of jobs and economic activity.
- (A Globally Responsible Wales) – reduction of carbon footprint through the promotion of renewable energy over carbon emitting sources and resource choices through which multiple benefits can be realised.

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

5 Planning Balance and Conclusion

5.1 Overall Planning Balance

5.1.1 As for all applications that come before a decision taker, they consider and weigh material considerations to arrive at an overall planning balance. The key material consideration is conformity with the policies of the Development Plan.

5.1.2 The Assessment set out herein demonstrates how the Proposed Development will not result in any unacceptable adverse effects in terms of environmental, social or economic considerations and therefore accords with the policies of Future Wales, namely Policies 17 and 18, other relevant policies of Future Wales and relevant LDP policy.

5.1.3 Policy 17 tells us that in determining such applications, significant weight must be given to the need to meet targets and commitments to combat the climate emergency.

5.1.4 Next, Planning Policy Wales is clear that Local Authorities should facilitate all forms of renewable and low carbon energy development.

5.1.5 Next, the CCC LDP shows us that there is support for the type of renewable energy development proposed in this case where the environmental and cumulative impacts can be addressed satisfactorily and where such developments will not cause demonstrable harm to residential amenity and will be acceptable within the landscape. Each proposal will be assessed on a case-by-case basis.

5.1.6 In balancing conformity with the Development Plan and the overall principle of the proposed renewable energy development being in accordance with national and local planning policy the other material consideration that weighs in favour of the Proposed Development is the overall need for renewable energy to generate electricity to meet international and national targets.

5.1.7 Future Wales and PPW strongly support renewable energy and renewable energy targets. However, both documents make it clear that any development of this nature needs to demonstrate acceptability in terms of minimal adverse environmental effects and careful consideration of development location.

5.1.8 In respect of BMV agricultural land, a robust site selection exercise has demonstrated that no reasonable alternative sites of lower ALC grade were available and within reasonable proximity to the secured grid connection. Infrastructure has been sited as far as practicable to avoid areas of BMV agricultural land and soil management measures are embedded in the Proposed Development to minimise the effects on soil structure. With the Site currently used for used for producing winter forage and grazing, continued grazing of the Site maintains its agricultural purpose and there will be only minimal consequential impact on agricultural output. In this circumstance, the need for renewable energy overrides the need to protect the BMV agricultural land which is not being used to the productive potential that justifies its protection.

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

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

5.1.11 Future Wales is clear that decision makers must give significant weight to Wales's need to meet its international commitments, and its target of generating 100% of consumed electricity by renewable means by 2035.

5.1.12 The ES and application as a whole sets out all of the associated impacts, both positive and negative and their significance and opportunities to mitigate any that require interventions to make them acceptable in planning terms. As set out within the ES, it is considered that on balance the Proposed Development's alignment with policy and contribution to meeting national and international renewable energy targets, in an 'appropriate' location and providing other residual benefit to the local and wider communities and economies weigh strongly in favour.

5.1.13 When weighing all material considerations, full weight must be afforded to the conformity with the Development Plan as a whole. This is the material consideration.

5.1.14 Significant weight must be afforded to Future Wales Policy 17.

5.1.15 In conclusion, we have overall acceptability in planning terms which means full weight in favour and it can therefore be concluded that the Proposed Development should be granted planning permission.