



National Grid Electricity Distribution

UPPER OGMORE GRID CONNECTION

Planning Statement





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CONTENTS

EXECUTIVE SUMMARY

1	INTRODUCTION	1
<hr/>		
1.1	OVERVIEW	1
1.2	PURPOSE OF THE PLANNING STATEMENT	1
1.3	REASON FOR DNS CONSENT AND EIA	2
1.4	THE APPLICANT	3
1.5	PRE-APPLICATION CONSULTATION / SCOPING REPORT	3
1.6	STRUCTURE OF THE PLANNING STATEMENT	3
2	OVERVIEW OF THE PROJECT	5
<hr/>		
2.1	INTRODUCTION	5
2.2	THE SITE	5
	ADMINISTRATIVE BOUNDARIES	5
2.3	THE PROJECT LOCATION AND SURROUNDINGS	6
2.4	THE PROJECT	7
	MICROSITING	7
2.5	ENVIRONMENTAL IMPACT ASSESSMENT	7
3	ENERGY POLICY	8
<hr/>		
3.1	BACKGROUND	8
4	PLANNING POLICY REVIEW	10
<hr/>		
4.1	BACKGROUND	10
4.2	UK PLANNING POLICY	10
	OVERARCHING NATIONAL POLICY STATEMENT FOR ENERGY (EN-1) (2023)	10
	NATIONAL POLICY STATEMENT FOR ELECTRICITY NETWORKS INFRASTRUCTURE (EN-5) (2023)	11

4.3	WELSH PLANNING POLICY	11
	FUTURE WALES: THE NATIONAL PLAN 2024 (2021)	11
	Policy 17 – Renewable and Low-Carbon Energy and Associated Infrastructure	12
	Policy 18 – Renewable and Low Carbon Energy Developments of National Significance	12
	PLANNING POLICY WALES (EDITION 12) (2024)	14
	TECHNICAL ADVICE NOTES	15
	Technical Advice Note 5: Nature Conservation and Planning (2009)	15
	Technical Advice Note 11: Noise (1997)	15
	Technical Advice Note 12: Design (2016)	15
	Technical Advice Note 24: The Historic Environment (2017)	16
4.4	THE LOCAL DEVELOPMENT PLAN	16
	BRIDGEND COUNTY BOROUGH COUNCIL	16
	NEATH PORT TALBOT COUNTY BOROUGH COUNCIL	16
4.5	OTHER LOCAL PLANNING CONSIDERATIONS	17
	SUPPLEMENTARY PLANNING GUIDANCE	17
	BCBC	17
	NPTCBC	17
	EMERGING LDP	17
4.6	PLANNING CONSIDERATIONS	18
	ASSESSMENT OF COMPLIANCE WITH NATIONAL POLICY	18
	Compliance with the Holford Rules	18
	BENEFITS OF THE PROJECT	20
	IMPACTS OF THE PPROJECT	20
	ASSESSMENT OF COMPLIANCE WITH LOCAL DEVELOPMENT PLAN	27
5	CONCLUSION	31
5.1	THE PLANNING BALANCE	31

TABLES

Table 4-1: Compliance with the Holford Rules	18
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Table 4-2: Assessment against Future Wales Policy 18 Requirements 2-12	23
Table 4-3: Compliance with Technical Advice Notes	27
Table 4-4: Bridgend Revised Local Development Plan	28
Table 4-5: Neath Port Talbot County Borough Council Local Development Plan	30

FIGURES

Figure 2-1 - Site Location and Local Authority Boundaries **Error! Bookmark not defined.**



EXECUTIVE SUMMARY

OVERVIEW

This Planning Statement has been prepared on behalf of National Grid Electricity Distribution (NGED) by WSP UK Ltd (WSP) as one of a suite of documents to be submitted to Planning and Environment Decisions Wales (PEDW) for the installation of a 66 kV overhead line and underground cable connection which will provide a connection between the Upper Ogmore Wind Farm, situated within Bridgend County Borough, to the wider national grid (referred to as the 'Project' from here on).

The Planning Statement has been prepared to provide a background and overview of the application and to demonstrate the suitability of the Project in planning terms. It supports the submission of an application to PEDW, acting on behalf of the Welsh Government, as a Development of National Significance (DNS). The Planning Statement has been informed by the findings of the Environmental Statement (ES), which sets out an assessment of the likely significant environmental effects of the Project.

SUMMARY OF ACCORDANCE WITH PLANNING POLICY

The Planning Statement identifies the primary role of Future Wales in the determination of DNS applications. Future Wales has a development plan status, and, by law, DNS applications must be assessed against it. Future Wales includes two policies that provide the strategic and detailed policy wording for consideration of renewable and low-carbon energy developments:

- Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure
- Policy 18 – Renewable and Low Carbon Energy Developments of National Significance

Whilst the focus of Policy 18 is to provide a decision-making framework for renewable and low-carbon energy technologies, it is considered to be the most pertinent policy for the assessment of a grid connection proposal. The policy is also highly applicable because the Project is directly related to the distribution of power from a 'renewable energy' development, namely the approved Upper Ogmore Wind Farm. A detailed assessment of the Project against these policies is set out in Section 4.6 of this Planning Statement. Section 4.6 also sets out a detailed assessment of the compliance with the Bridgend County Borough Council and Neath Port Talbot LDPs.

An assessment of the benefits of the Project and the adverse environmental impacts, as assessed in the accompanying ES, concludes that the Project is considered to accord with both Policy 17 and Policy 18 of Future Wales, and the planning balance weighs heavily in favour of the Project.

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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1. This Planning Statement (PS) has been prepared on behalf of National Grid Electricity Distribution (NGED) (the Applicant) by WSP Ltd (WSP) to support a submission to Planning and Environment Decisions Wales (PEDW) acting on behalf of the Welsh Government for consent as a Development of National Significance (DNS). The Project is directly connected to the Upper Ogmore Wind Farm's on-site electricity infrastructure. It comprises both 66 kilovolts (kV) overhead lines (OHL) and underground cables (UGC), which will provide the connection between the National Grid and the Upper Ogmore Wind Farm. The Project falls within the boundaries of two local planning authorities. The majority of the Project is situated within the Bridgend Borough County Council (BCBC); however, some of the proposed line partially traverses through Neath Port Talbot Borough Council (NPTBC).
- 1.1.2. Further information regarding the Project is provided within **Section 2** of this report.

1.2 PURPOSE OF THE PLANNING STATEMENT

- 1.2.1. As identified within Planning Policy Wales (PPW), planning applications should be determined in accordance with the approved or adopted development plan unless material considerations indicate otherwise.
- 1.2.2. This PS seeks to provide a background and overview of the application and aims to display the suitability of the Project in planning terms. This document should be read in conjunction with the accompanying **Design and Access Statement (DAS)**, which sets out the approach taken to the design and access of the Project, and the **Environment Statement (ES)**, which sets out the assessment of the likely significant environmental effects of the Project, and the **Green Infrastructure Statement (GIS)**.
- 1.2.3. Further to the above, the purpose of this Planning Statement is to:
- provide a brief description of the Project, including its site history and approach to the preparation of the proposal;
 - set out the objectives of the Project and other design considerations;
 - explain the benefits of the Project in the context of the need for renewable energy and summarise the overall environmental performance of the scheme; and
 - review the planning policy framework and set out the conformity of the Project with the framework.

1.3 REASON FOR DNS CONSENT AND EIA

- 1.3.1. The Project is considered a DNS according to the Planning (Wales) Act 2015¹, the Development of National Significance (Wales) (Regulations) 2016 (as amended)², and the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended)³.
- 1.3.2. The requirement for a DNS application for both the OHL and UGC elements is triggered by the OHL section of the Project, referencing the England and Wales High Court (Administrative Court) Decisions (2019)⁴. The Project is considered to be relevant to the following factors:
- “iii. Functional interdependence - where one part of a development could not function without another, this may indicate that they constitute a single project (Burrige at [32], [42] and [78]).”*
- 1.3.3. The Project does not fall under the development types set out within Schedule 1 of the EIA regulations. However, the Project is described within Schedule 2 of the EIA Regulations; specifically, Schedule 2 (3)(k): the transmission of electrical energy by overhead cables.
- 1.3.4. This is further confirmed within the recent DNS Procedural Guidance (2025)⁵ which describes *“the installation of an electric line above ground up to 132kV which is associated with a devolved generation station”* as a DNS according to the regulations set out above.
- 1.3.5. The Project is therefore considered to be functionally interdependent with the consented Upper Ogmore Wind Farm, in that the wind farm will not be able to properly function without the proposed grid connection.
- 1.3.6. The Application, which includes an Environmental Statement (ES), considers in each ES chapter the in-combination effects between the consented Upper Ogmore Wind Farm and the proposed electricity connection (the ‘Project’).
- 1.3.7. Further to the above, the wider context of the Project should also be considered, and is outlined below in relation to the nearby Foel Trawsnant Grid Connection:
- The Project will connect into the Foel Trawsnant Grid Connection, which is subject to a separate DNS (Ref: DNS CAS-02505-N3T6M4) and is being progressed by a different applicant.
 - The Foel Trawsnant Grid Connection is a scheme to connect the approved Foel Trawsnant Wind Farm to a point of connection (PoC) identified by National Grid approximately 4km north of Pyle.

¹ Welsh Government (2015). Planning (Wales) Act 2015. Available online:

<https://www.legislation.gov.uk/anaw/2015/4/contents>. [Accessed 13 August 2025].

² Welsh Government (2016). The Development of National Significance (Wales) Regulation 2016. Available online: <https://www.legislation.gov.uk/wsi/2016/56/contents>. [Accessed 13 August 2025].

³ Welsh Government (2017). Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations (as amended). Available at: <https://www.legislation.gov.uk/wsi/2017/567/contents>. [Accessed 13 August 2025].

⁴ <https://www.gov.wales/developments-national-significance-dns-guidance#:~:text=Explains%20the%20planning%20application%20process%20for%20developments,of%20national%20significance%20%28defined%20categories%20of%20infrastructure%20developments%29>.

⁵ Welsh Government (2025). Development of National Significance (DNS): procedural guidance. Available online: <https://www.gov.wales/developments-national-significance-dns-procedural-guidance>. [Accessed 13 August 2025].

- The Foel Trawsnant Grid Connection and the Project will share the same PoC.
- While the Foel Trawsnant is a stand-alone scheme, this Project relies on the delivery of the Foel Trawsnant Grid Connection to connect to the PoC.
- As a result, the intention is that the Project would run from the Upper Ogmores Wind Farm to a connection point within the Foel Trawsnant Grid Connection, at which point the connection would run to the PoC.
- The application for this Project is for the grid connection section between the Upper Ogmores Wind Farm and the Foel Trawsnant Grid Connection only.
- Accordingly, the ES for this project will consider the cumulative environmental effects resulting from the Foel Trawsnant Grid Connection, as well as the Upper Ogmores Wind Farm.

1.4 THE APPLICANT

- 1.4.1. National Grid Electricity Distribution (NGED) is the regional electricity distribution division of National Grid. It is the UK's largest electricity distribution network serving nearly 8 million customers in the East and West Midlands, South West and Wales, delivering essential power to millions of homes and businesses across its regions.
- 1.4.2. NGED is seeking permission for a low voltage (66kV) grid connection consisting of both Underground Cables and Overhead Lines to provide a connection between the Upper Ogmores Wind Farm to the wider National Grid.

1.5 PRE-APPLICATION CONSULTATION / SCOPING REPORT

- 1.5.1. A Scoping Report Request was submitted by WSP to the Welsh Ministers and relevant Local Planning Authorities in April 2025 (ref. CAS-03678-M4Y0G7). The Scoping Report set out the topics that would be scoped in (and the environmental studies that would be undertaken to establish the effects of the project) and the topics that would be scoped out.
- 1.5.2. PEDW formally issued the Scoping Opinion in response to the Scoping Report on 19th June 2025. These have been used to inform the shape of the scope of the assessments, based on responses from the local councils and consultees.
- 1.5.3. This Draft Planning Statement, along with other supporting documents for the proposed DNS planning application, including a Draft ES, is to be subject to six weeks of pre-application consultation between November and December 2025.
- 1.5.4. The results of that consultation will then be used to refine and update (where necessary) the application documents prior to final submission to PEDW.

1.6 STRUCTURE OF THE PLANNING STATEMENT

- 1.6.1. The remainder of the document provides the following information:
- **Section 2** – Provides a description of the applicant, the site, the Project, planning history and Environmental Impact Assessment (EIA) approach;
 - **Section 3** – considers the need for the Project. The section demonstrates how it would contribute to reducing the effect of climate change and improving the security of supply;
 - **Section 4** – this section summarises the national and local policy context and analyses how the Project performs against national planning policy requirements. It also sets out how the scheme



performs against the highlighted Local Development Plans and any other material considerations;
and

- **Section 5** – concludes how the Project meets the planning policy requirements through the application of the planning balance.

2 OVERVIEW OF THE PROJECT

2.1 INTRODUCTION

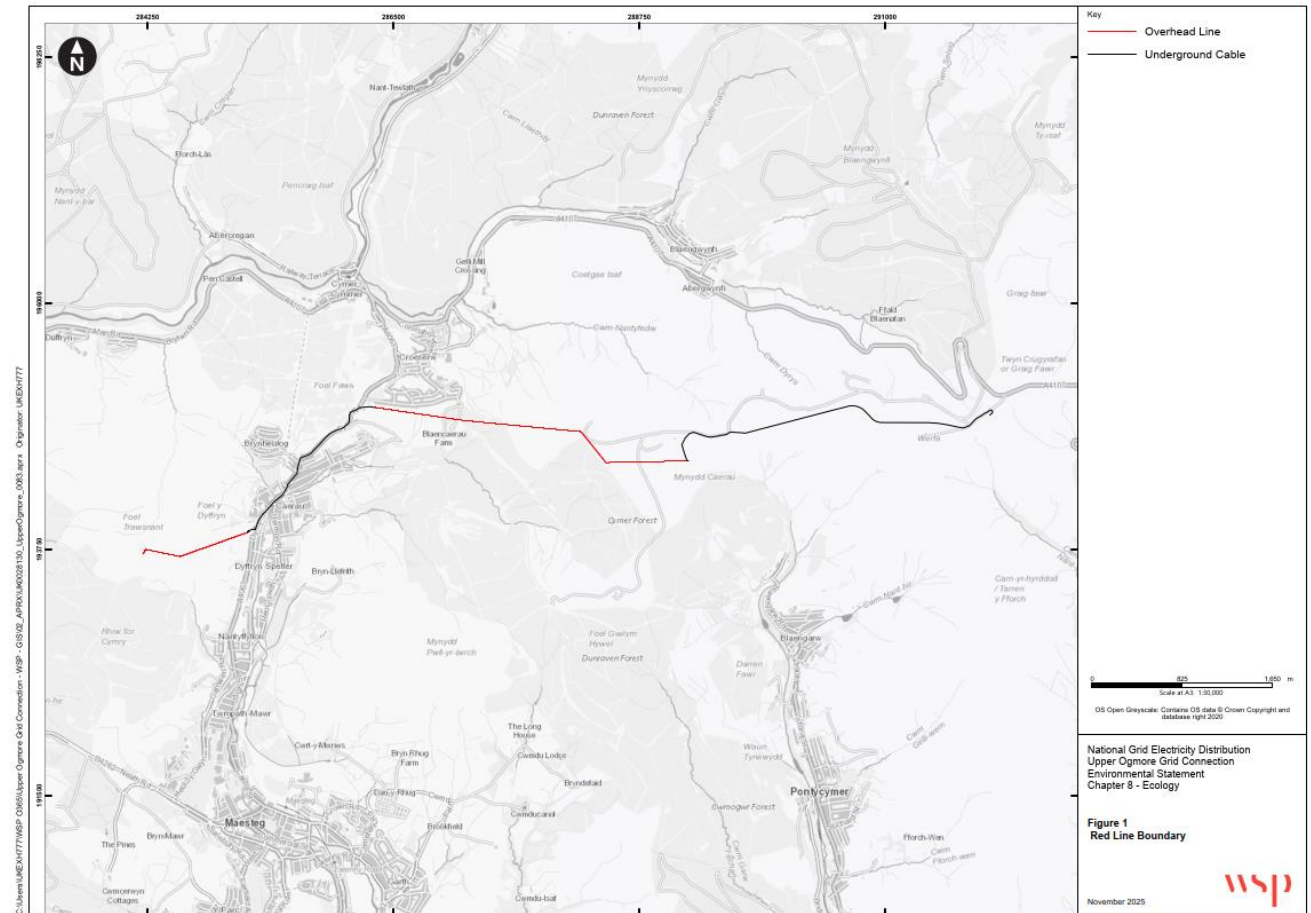
- 2.1.1. This section of the PS aims to provide a description of the Site and the surrounding area. Due to the lateral nature of the Project, it falls within two Local Planning Authorities, which is discussed in further detail below.

2.2 THE SITE

ADMINISTRATIVE BOUNDARIES

- 2.2.1. The Project falls within the administrative bounds of two Local Planning Authorities.
- Bridgend County Borough Council (BCBC); and
 - Neath Port Talbot County Borough Council (NPTCBC).
- 2.2.2. The Project covers a total length of 9km, which will be split into the following sections:
- 1.1 km western OHL;
 - 1.7 km western UGC;
 - 3.0 km eastern OHL; and
 - 3.2 km eastern UGC.
- 2.2.3. **Figure 1** depicts the site location and the relevant local authority boundaries.

Figure 1: Site Location



2.3 THE PROJECT LOCATION AND SURROUNDINGS

- 2.3.1. The connection will consist of approximately 4.9 km of underground cabling (UGC) and approximately 4.1 km of overhead lines. The Route will begin in the west, at an intersection with the Foel Trawnant Grid Connection (DNS reference: DNS CAS-02505-N3T6M4) to the west of the A4063 near Caerau, at a tee-off point connecting the grid connection to the wider national grid (NG Ref: SS 84115 93652). The Route begins as an Overhead Line (OHL), traversing approximately 1.1km (referred to as the Western OHL section). Upon reaching Caerau, the route then transitions into Underground Cables (UGC) (referred to as the Western UGC section), following the existing highway network (A4063) for approximately 1.7km to the north (NG Ref: SS 87032 94984). Immediately before reaching Brynheulog Road, the route goes back to OHL (referred to as the Eastern OHL Section) for approximately 3 km. A small part of the Project will traverse through the common of Mynydd Llangeinor, a designated common land unit 26 (CL26). To the northwest of Blaengarw, close to Mynydd Caerau, the route transitions back into UGC (referred to as the eastern UGC section) and continues west for approximately 3.2km. The connection will finish at the previously consented Upper Ogmore Wind Farm (NG Ref: SS 92011 95059).
- 2.3.2. In terms of the site and surrounding area, the western OHL section predominantly travels through a mix of gorse scrub, modified grassland and upland acidic grassland. The western UGC travelling through Caerau is predominantly on the highway, traversing through a mainly residential area. Once the cable transitions back to the eastern OHL, it traverses through a mosaic of several habitat types.

Initially, it passes through purple moor-grass and rush pastures for approximately 0.81km to the south of Brynheulog Road. The eastern OHL then passes through an area of other broadleaved woodland for approximately 0.13km, to the south of Croeserw, before continuing through areas of upland acidic grassland and upland rush pasture.

2.4 THE PROJECT

2.4.1. The main elements of the Project consist of the following:

- 4.1 km of overhead lines, including 104 wooden poles (placed side by side to form the proposed H-Pole technology to support the overhead line – resulting in 52 H-Poles in total)
- 4.9 km of underground cable, including cable ducts and 18 joint bay boxes;
- Temporary working areas, e.g. construction compound; and
- Watercourse crossing(s).

2.4.2. A full description of the development is provided in **Draft ES Chapter 4: Development Description**.

MICROSITING

2.4.3. The Project has a micro-siting allowance of 10m. Any such repositioning will be limited so as not to involve encroachment into any environmentally or technically constrained areas. In addition, micro-siting provides scope to mitigate potential, localised geo-environmental and geotechnical constraints.

2.5 ENVIRONMENTAL IMPACT ASSESSMENT

2.5.1. An environmental impact assessment reported within an Environmental Statement (ES) has been undertaken as part of the application submission. The EIA has been prepared in accordance with the requirements of the EIA Regulations. The ES provides the environmental information that will be used by stakeholders to inform the process of determining the application.

2.5.2. A request for a Scoping Opinion was submitted in April 2025 (DNS Application reference: CAS-03678-M4Y0G7) with a formal response received on 19th June 2025 (**Appendix 2B of Draft ES Chapter 2: EIA Approach**), including a consultation response from Bridgend County Borough Council and Neath Port Talbot County Borough Council, as well as other statutory consultees. Drawing upon the EIA Scoping responses received to date and subsequent assessment work, the ES includes an assessment of the likely significant environmental effects of the Project.

2.5.3. Further information on the EIA scoping process, as well as information about the approach used to prepare the ES, is outlined in **Draft ES Chapter 2: EIA Approach**.

2.5.4. The ES should be read in conjunction with this Planning Statement, the Design and Access Statement (DAS) and the Green Infrastructure Statement (GIS) that have been submitted as part of this application.

3 ENERGY POLICY

3.1 BACKGROUND

- 3.1.1. The proposed Project is associated with the Upper Ogmore Wind Farm (DNS-3213662) and will provide a connection between the approved wind farm and the wider national grid. Without the Project, the wind farm would not be able to serve its purpose in providing renewable energy. The requirement for renewable energy is accepted at the national policy level, with wind energy widely recognised as the most mature renewable energy technology currently available, as reflected in the approval of the Upper Ogmore Wind Farm.
- 3.1.2. In light of the above, the Project directly assists in meeting the energy, climate and net zero objectives of the following International, UK and Welsh energy legislation, policy and strategies:
- International Agreements
 - Paris Agreement 2015; and
 - Glasgow Climate Pact 2021.
 - UK energy legislation and policy
 - Climate Change Act 2008 (as amended);
 - Energy Act (2008, 2011, 2013, 2016);
 - UK Renewable Energy Strategy (2009);
 - Clean Growth strategy (2017);
 - Net Zero Strategy: Build Back Greener (2021); and
 - British Energy Security Strategy (2022);
 - Powering up Britain – March 2023 Energy Security Secretary Statements; and
 - Carbon Budget Delivery Plan (March 2023)
 - Welsh energy legislation and policy
 - Energy Wales: A Low Carbon Transition (2012);
 - Wellbeing of Future Generations (Wales) Act 2015;
 - Environment Wales (Act) 2016 (as amended);
 - Policy Statement: Local Ownership of Energy Generation In Wales – Benefitting Wales Today And For Future Generations (2020);
 - Energy Generation in Wales Report 2021 (2022);
 - Programme for Government (2021);
 - Net Zero Wales (2021); and
 - Energy Generation Targets For Wales: Statement To Assembly Members (2017) and 2023 Update.
- 3.1.3. With specific regard to the grid connection, the following legislation and policy are considered to be particularly relevant to the Project:
- Bridge End County Borough Replacement Local Development Plan 2018 – 2033
 - Neath Port Talbot County Borough Council Local Development Plan 2011 - 2026
 - Future Wales: National Plan 2040
 - Planning Policy Wales Edition 12 (2024)



- Technical Advice Notes
- NPS EN-1 (Overarching National Policy Statement for Energy)
- NPS EN-5 (National Policy Statement for Electricity Networks Infrastructure)

4 PLANNING POLICY REVIEW

4.1 BACKGROUND

- 4.1.1. This section of the PS sets out the key planning policies relevant to the consideration of the Project at the UK, Wales and local levels. It begins with an assessment of performance against UK and Welsh planning policy. It is then followed by consideration of the scheme in relation to the pertinent local policies contained within both Bridgend and Neath Port Talbot County Borough Councils, as well as the associated guidance in the non-statutory Supplementary Planning Guidance (SPG).

4.2 UK PLANNING POLICY

- 4.2.1. This section sets out the relevant UK-wide policy context set out in the National Policy Statements (NPS). In Wales, DNS applications are determined in accordance with Future Wales: The National Plan 2040 (considered in detail in section 4.3 of this Planning Statement), in line with the revised legal framework since the NPS was first enacted in 2011. Whilst NPS EN-1 paragraph 1.2.1 makes it clear that NPSs may only be a material consideration for Town and Country Planning Act applications in England, it is considered that they remain useful in providing a broader context on energy policy that applies across England and Wales and are therefore briefly reviewed here.

OVERARCHING NATIONAL POLICY STATEMENT FOR ENERGY (EN-1) (2023)⁶

- 4.2.2. A revised version of NPS EN-1 came into force on 17th January 2024. EN-1 sets out national policy for energy infrastructure and provides the primary policy for decision by the Secretary of State.
- 4.2.3. Section 2 of EN-1 refers to the target of achieving net-zero carbon emissions in 2050 and a 78% reduction in Greenhouse Gas (GHG) emissions by 2035. The Project would support the overarching aims of EN-1 by delivering renewable energy by providing key infrastructure to connect a devolved onshore wind farm to the wider national grid.
- 4.2.4. Section 3 discusses the urgent need for new electricity networks. Paragraph 3.3.65 states that:
“There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives”.
- 4.2.5. Paragraph 3.3.66 goes on to state that *“the security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts”.*

⁶ Department of Energy and Climate Change (2024). Overarching National Policy Statement for Energy (EN-1). (Online) Available at: <https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure> (Accessed 13 August 2025).

NATIONAL POLICY STATEMENT FOR ELECTRICITY NETWORKS INFRASTRUCTURE (EN-5) (2023)⁷

- 4.2.6. A revised version of NPS EN-5 came into force on 17th January 2024. EN-5 is specifically related to electricity network infrastructure, including factors influencing site selection and design. EN-5 refers to the application of the Holford Rules (at paragraph 2.9.16). These are guidelines for the routing of new lines.
- 4.2.7. EN-5 only applies to voltages of 132kV and above, whilst the Holford Rules were developed to advise on the routing of steel lattice pylons. Whilst this is not the case for this Project, which is for a 66kV connection using wooden H-poles, consideration of how the proposed route complies with the Holford Rules is provided in **Section 4.6** below.

4.3 WELSH PLANNING POLICY

FUTURE WALES: THE NATIONAL PLAN 2040 (2021)

- 4.3.1. Future Wales: The National Plan 2040 (FWNP)⁸ was published in February 2021 and sets out the national development framework for development in Wales up to 2040. FWNP sets out a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems, and improving the health and well-being of communities. Future Wales is the policy document against which a DNS (including the Project) must be determined in accordance with, unless material considerations indicate otherwise, in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 4.3.2. Future Wales was prepared to provide a clear, long-term spatial direction for Government policy, action and investment in Wales. It sets out a framework for addressing key national priorities through the planning system. It is stated on page 46 of the plan, *“Future Wales, together with Planning Policy Wales, will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create the energy we generate, the natural resources and materials we use and how we live and travel”*.
- 4.3.3. Future Wales recognises the role that Wales can play in supporting the use of renewable energy. The plan recognises on page 48 that, *“Wales can become a world leader in renewable energy technologies”*. It is further recognised that Wales’ potential for wind, tidal, and solar energy generation and commitment and willingness to support both large and community-scaled projects provide *“a strong lead for renewable energy development [...] support the renewable sector, attract new investment and reduce carbon emissions”*.

⁷ Department of Energy and Climate Change (2024). Overarching National Policy Statement for Energy (EN-1). (Online) Available at: <https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure> (Accessed 13 August 2025)

⁸ The Welsh Government (2021). Future Wales: The National Plan 2040. (Online) Available at: <https://www.gov.wales/future-wales-national-plan-2040> (Accessed 13 August 2025).

- 4.3.4. This sentiment is further highlighted on page 96, where it is stated that *‘Wales is abundant in opportunities to generate renewable energy, and the Welsh Government is committed to maximising this potential’*; as such, Future Wales has set the target for 70% of electricity consumption to be generated from renewable energy by 2030.
- 4.3.5. It is also highlighted (via Policy 18) that the Welsh Government is supportive of both on- and offshore wind infrastructure; further to this, the government is supportive of associated infrastructure (cables).
- 4.3.6. Page 99 of the FWNP states that *‘the Welsh Government acknowledges the significant challenge that grid infrastructure and capacity will have on the potential for new on-shore and off-shore renewable energy developments across Wales. We are committed to working with energy networks and developers to identify opportunities and barriers, as well as working collaboratively to find solutions’*.
- 4.3.7. The following FWNP Policies of relevance to the Project are listed below:
- Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure; and
 - Policy 18 – Renewable and Low Carbon Energy Developments of National Significance.

Policy 17 – Renewable and Low-Carbon Energy and Associated Infrastructure

- 4.3.8. Policy 17 states that *“The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs”* whilst policy makers are required to give *“significant weight to the need to meet Wales’ international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency”*. It should be noted that the 30% target has now been superseded by the Welsh Government (2023b) to 100% by 2035.
- 4.3.9. Policy 17 also states that *“New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities”*.

Policy 18 – Renewable and Low Carbon Energy Developments of National Significance

- 4.3.10. Whilst the focus of Policy 18 is to provide a decision-making framework for renewable and low-carbon energy technologies, it is considered to be the most pertinent policy for the assessment of a grid connection proposal. The policy is also highly applicable because the Project is directly related to the distribution of power from a ‘renewable energy’ development, namely the approved Upper Ogmore wind farm. In addition, the northern section of the overhead line falls within the pre-assessed area (PAA) No.9 for wind. Future Wales makes clear that landscapes within PAA are capable of accommodating development (onshore wind) acceptably and provides a presumption in favour of large-scale wind energy development. The methodology used for defining the boundaries of the PAA areas in Future Wales specifically considered the landscape impacts of wind turbines up to 250m in height.
- 4.3.11. As a development qualifying as a Development of National Significance, Policy 18 sets out the following criteria that apply to the Project:
- *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 (IROPI) 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.*
- *The cumulative impacts of existing and consented renewable energy schemes should also be considered.*

PLANNING POLICY WALES (EDITION 12) (2024)

- 4.3.12. Planning Policy Wales (Edition 12)⁹ was published in July 2024 and sets out the land use planning policies of the Welsh Government. The PPW is also supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters.
- 4.3.13. It is stated, in paragraph 1.2, that the primary objective of PPW is to *“ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, and other key legislation”*.
- 4.3.14. In paragraph 3.30, 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.”*
- 4.3.15. Paragraph 5.7.7 goes on to state that *“the benefits of renewable and low-carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance”*.
- 4.3.16. In relation to the electricity grid network and energy storage, the following is relevant to the Project:
- The need for appropriate energy infrastructure is contextualised within paragraph 5.7.2, which states *“overall power demand is expected to increase as a result of growing electrification of transport and heat.”* This is further solidified by PPW stating that *“in order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure”*.
 - Paragraph 5.7.8 states that *“an effective grid network is required to fulfil the Welsh Government’s renewable and low carbon ambitions”*.
 - Paragraph 5.7.9 states that the *“Welsh Government’s preferred position on new power lines is that, where possible, they should be laid underground. **However**, it is recognised that a balanced view must be taken against costs which could render otherwise acceptable projects unviable”* (bolding is our emphasis).
 - Paragraph 5.7.10 states, *“Planning authorities should plan positively for grid infrastructure. Development plans should facilitate the grid infrastructure required to support the renewable and low-carbon energy potential for the area, particularly areas identified for such development. Planning authorities should support appropriate grid developments, whether or not the developments to be connected are located within their authority”*.
 - Section 6 of PPW12 also sets out a requirement for development to provide a net benefit for biodiversity (NBB) and improve, or enable the improvement, of the resilience of ecosystems through the application of the step-wise approach, which needs to consider enhancement and long-term management at each step of the development process. This is further enforced by the

⁹ The Welsh Government (2024). Planning Policy Wales (Edition 12). (Online) Available at: <https://www.gov.wales/planning-policy-wales> (accessed 13 August 2025)

DECCA Framework, as referenced within Paragraph 6.4.5, which encourages planning authorities to take account of and promote the adaptability and diversity of ecosystems.

TECHNICAL ADVICE NOTES

Technical Advice Note 5: Nature Conservation and Planning (2009)¹⁰

- 4.3.17. TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation within Wales. It sets out the key principles of planning for nature conservation for both local development plans and when deciding planning applications that may affect nature conservation. These include:
- Being mindful of the principles of sustainable development, environmental limits, and the precautionary principle;
 - Contributing to the protection and improvement of the environment;
 - Promoting the conservation and enhancement of statutorily designated areas and undeveloped coast;
 - Ensuring that appropriate weight is attached to designated sites of international, national and local importance;
 - Protecting wildlife and natural features in the wider environment;
 - Ensuring that all material considerations are taken into account and decisions are informed by adequate information about the potential effects of development on nature conservation;
 - Ensuring that the range and population of protected species is sustained; and
 - Avoiding harm to nature conservation, minimising unavoidable harm by mitigation measures, offsetting residual harm by compensation measures and looking for new opportunities to enhance nature conservation.

Technical Advice Note 11: Noise (1997)¹¹

- 4.3.18. TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise, without placing unreasonable burdens on applicants. Local planning authorities must ensure that noise-generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.

Technical Advice Note 12: Design (2016)¹²

- 4.3.19. The purpose of this TAN is to equip all those involved in the design of development with advice on how “promoting sustainability through good design” may be facilitated through the planning system and the preparation and validation of mandatory design and access statements. There are a number of key objectives in relation to design which are set out by TAN 12:

¹⁰ Welsh Assembly Government (2009). Technical Advice Note 5: Nature Conservation and Planning. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf> (Accessed 13 August 2025).

¹¹ Welsh Assembly Government (1997). Technical Advice Note 11: Noise. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan11-noise.pdf> (Accessed April 2024).

¹² Welsh Government (2016). Technical Advice Note 12: Design. (Online) Available at: <https://gov.wales/sites/default/files/publications/2018-09/tan12-design.pdf> (Accessed April 2024).

- Access - Ensuring ease of access for all;
- Character - Sustaining or enhancing local character, promoting legible development, promoting a successful relationship between public and private space, promoting quality, choice and variety and promoting inclusive design;
- Community Safety - Ensuring attractive, safe public spaces and security through natural surveillance;
- Environmental Sustainability - Achieving efficient use and protection of natural resources, enhancing biodiversity and designing for change; and
- Movement - Promoting sustainable means of travel.

Technical Advice Note 24: The Historic Environment (2017)

- 4.3.20. TAN 24 provides guidance on how the planning system should consider the historic environment during development plan preparation and decision-making on planning applications.

4.4 THE LOCAL DEVELOPMENT PLAN

- 4.4.1. As described in Section 4.3 above, Future Wales forms the highest tier of the Development Plan and contains the primary planning policies against which DNS are determined. This section of the Planning Statement sets out the key LDP policies relevant to the consideration of the Project. The Project is situated within the following two administrative areas:

- Bridgend County Borough Council; and
- Neath Port Talbot County Borough Council.

BRIDGEND COUNTY BOROUGH COUNCIL

- 4.4.2. BCBC adopted its Replacement Local Development Plan (RLDP) in March 2024. The policies of relevance to the Project are:

- Policy DNP 1: Development in the Countryside
- Policy DNP 4: Special Landscape Areas
- Policy DNP 5: Local and Regional Nature Conservation Sites
- Policy DNP 6: Biodiversity, Ecological Networks, Habitats, and Species
- Policy DNP 7: Trees, Hedgerows, and Development
- Policy SP 13: Decarbonisation and Renewable Energy
- Policy SP 18: Conservation of the Historic Environment

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

- 4.4.3. NPTCBC adopted its Local Development Plan in January 2016. The policies of relevance to the Project are:

- Policy SP 1: Climate Change
- Policy SP 15: Biodiversity and Geodiversity
- Policy EN 2: Special Landscape Area
- Policy SP 18: Renewable and Low Carbon Energy

4.5 OTHER LOCAL PLANNING CONSIDERATIONS

SUPPLEMENTARY PLANNING GUIDANCE

BCBC

SPG 19: Biodiversity and Development (July 2014)¹³

- 4.5.1. SPG 19, which was published in July 2014, is part of a wider suite of Planning Practice Guidance published by the Council and used to inform and expand upon the existing biodiversity and green infrastructure policies within the LDP.
- 4.5.2. This SPG outlines how the Council will expect habitats to be considered as part of development proposals within the County Borough of Bridgend. Section A of the document introduces the concept of the 'green infrastructure approach'.
- 4.5.3. Paragraph 5.2 states that 'green infrastructure provides the spatial framework for a range of natural functions and uses. By adopting the Green Infrastructure Approach, development schemes may be adapted or designed to provide a range of important benefits.

NPTCBC

SPG: Landscape and Seascape (May 2018)¹⁴

- 4.5.4. This SPG was published in May 2018 and provides information and guidance setting out the expectations on all development proposals to protect and enhance all landscapes and seascapes. Paragraph 3.1.5 of the SPG states that 'opportunities to enhance landscape character and minimise negative impacts should be addressed through the development, location, and design process'.

SPG: Biodiversity and Geodiversity (May 2018)¹⁵

- 4.5.5. The biodiversity and geodiversity SPG was published in May 2018 and provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest.

EMERGING LDP

- 4.5.6. Neath Port Talbot County Borough Council are currently in the process of adopting a Replacement Local Plan for the 2023 – 2038 planning period. The NPTCBC website states that the Replacement Local Development Plan should be adopted in April 2027.

¹³ Bridgend Borough Council (2014). SPG 19: Biodiversity and Development. Available at: <https://uat.bridgend.gov.uk/residents/planning-and-building-control/local-development-plan/supplementary-planning-guidance/> [Accessed 13 August 2025]

¹⁴ Neath Port Talbot County Borough Council (2016). Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan (Online) Available at: <https://www.npt.gov.uk/planning-and-building-control/planning-policy/supplementary-guidance/> (Accessed on 13 August 2025).

¹⁵ Neath Port Talbot County Borough Council (2018). SPG: Landscape and Seascape. Available at https://media.npt.gov.uk/media/j42dzulp/spg_landscape_seascape_may18.pdf?v=20241209172432 [Accessed 13 August 2025].

4.5.7. The policies of relevance to the Project are identified below in **Table 4-1**.

4.6 PLANNING CONSIDERATIONS

ASSESSMENT OF COMPLIANCE WITH NATIONAL POLICY

4.6.1. Future Wales is the primary planning policy document against which applications qualifying as DNS are to be assessed as the highest tier of the development plan. Future Wales (page 96) confirms:
“As set out in legislation, applications for Developments of National Significance must be determined in accordance with Future Wales, which is the national development plan for Wales.”

4.6.2. Future Wales is the most up-to-date development plan and in accordance with the latest PPW. Therefore, an assessment of the Project against the policies of Future Wales is crucial to establishing the planning merits of the Project. However, understanding the compliance with the aims of PPW is also important to the assessment of compliance with national policy.

Compliance with the Holford Rules

4.6.3. Whilst neither Future Wales nor PPW references the Holford Rules, they remain relevant when designing the route of an OHL. **Table 4-1** below sets out how the proposed route complies with the Holford Rules.

Table 4-1: Compliance with the Holford Rules

<p>Holford Rule 1 – <i>“avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence”.</i></p>	<p>The Project does not pass through any areas of highest amenity value, such as National Parks or National Landscapes (formerly AONBs) or Ramsar sites. It therefore complies with Holford Rule 1.</p>
<p>Holford Rule 2 – states that: <i>“avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the bigger structures which are used when lines change direction”.</i></p>	<p>The Project does not pass through any smaller areas of high amenity value or scientific interest, such as Special Areas of Conservation or SSSIs. It therefore complies with Holford Rule 2.</p>
<p>Holford Rule 3 – states that <i>“other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.”</i></p>	<p>The Project follows the most direct route to achieve a connection into the Foel Trawsant Grid Connection, whilst minimising the visual effects on local communities by utilising sections of underground cable through built up areas.</p>
<p>Holford Rule 4 – states that <i>“choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.”</i></p>	<p>As stated above, the Holford Rules apply to voltages above 132kV, which tend to require the use of steel lattice pylons. This is not the case for this Project, which, given the scale of the proposed H-Poles (with a maximum height of just 15m), means they will often be backgrounded against hills and trees. It is therefore considered that the Project complies with Holford Rule 4.</p>

<p>Holford Rule 5 – states that <i>“prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees”</i>.</p>	<p>Given the scale of the H-Poles proposed in this project (with a maximum height of just 15m), the height of the poles will ensure that visual effects are minimised. It is therefore considered that the Project complies with Holford Rule 5.</p>
<p>Holford Rule 6 – states that <i>“in country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or wirescape”</i>.</p>	<p>The landscape through which the overhead lines will pass contains minimal other electricity lines, distribution poles, other masts, wires and cables. As a result, a concentration of wirescape will not occur. The Project therefore complies with Holford Rule 6.</p>
<p>Holford Rule 7 – states that <i>“approach urban areas through industrial zones, where they exist, and when pleasant residential and recreational land intervenes between the approach line and substation, carefully assess the comparative costs of undergrounding, for lines other than those of the highest voltage”</i>.</p>	<p>The Project proposes the use of underground cables through urban areas. This ensures the Project complies with Holford Rule 7.</p>
<p>Holford Rule Supplementary Note 1 – states <i>“avoid routeing close to residential areas as far as possible on grounds of general amenity”</i>.</p>	<p>The Project proposes the use of underground cables in residential areas, as opposed to overhead lines. This ensures the effects on residential amenity are minimised. The Project therefore complies with Holford Rule Supplementary Note 1.</p>
<p>Holford Rule Supplementary Note 2 – states <i>“Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value”</i>.</p>	<p>The Project would create a localised significant effect upon the two SLA (local designations) within which H-Poles would be sited. Effects upon SLAs should not be taken as reasons in themselves to refuse a grid connection. This is because Policy 18 of Future Wales places an emphasis on avoiding unacceptable adverse impacts on <i>“the setting of National Parks and Areas of Outstanding Natural Beauty”</i>, which the Project has no significant effects upon.</p> <p>In addition, for the northern section of overhead line, the point made below in paragraph 4.6.21 applies: if 250m high wind turbines are acceptable in the PAA, it stands to reason that 15m high H-poles would be acceptable.</p> <p>It is therefore considered that the Project complies with Holford Rule Supplementary Note 2.</p>
<p>Holford Rule Supplementary Note 3 – states <i>“in addition to adopting appropriate routeing, evaluate where appropriate the use of alternative tower designs now available where</i></p>	<p>The Project proposes the use of wooden H-Poles, which are common features in the landscape of Wales. Whilst they will be evident, they are not considered to be harmful to the</p>

<p><i>these would be advantageous visually, and where the extra cost can be justified”.</i></p>	<p>landscape. The DAS details the design evolution of the Project; overall it is considered that smaller (15m) wooden structures are most suited to the site and surroundings of the Project. The chosen H-poles will blend into the landscape to a far greater degree than higher voltage connections that require taller and more prominent structures (such as steel lattice pylons). As a result, alternative tower designs would not be advantageous in this instance. It is therefore considered that the Project complies with Holford Rule Supplementary Note 3.</p>
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BENEFITS OF THE PROJECT

- 4.6.15. As noted above, the proposal enables the Upper Ogmere Wind Farm to be connected to the national grid. The benefits of the Project are therefore directly linked to the benefits of the wind farm, which were established and supported through the approval of the wind farm. In summary, those benefits are related to:
- assisting in meeting targets for the delivery of renewable energy;
 - helping to tackle the climate emergency;
 - helping to meet decarbonisation targets; and
 - increasing energy security.

IMPACTS OF THE PPROJECT

LANDSCAPE & VISUAL

- 4.6.16. Future Wales Policy 17 states that *“New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities”.*
- 4.6.17. Similarly, Criterion 1 of Future Wales Policy 18 concerns effects upon the landscape and states that *“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)”.*
- 4.6.18. The landscape impacts on the Project have been assessed within **Draft ES Chapter 6: Landscape and Visual Impact Assessment**. The LVIA detailed the relevant landscape designations and determined the potential landscape and visual effects associated with the Project. It confirms that there are no statutory landscape designations, such as National Parks or National Landscapes, within the Study Area.
- 4.6.19. The LVIA also identifies several non-statutory landscape designations, including Local Character Areas (LCAs), National Character Areas (NCAs), and Special Landscape Areas (SLAs). The LVIA considered the effect of the identified character and landscape areas within the Study Area.
- 4.6.20. In terms of construction, the main effects of the Project on landscape and visual receptors are considered to be the presence and movement of construction machinery and vehicles, creation of a temporary compound, the pole foundations, and minor tree removal (lopping only) to maintain safety clearances towards OHL and to provide access points for vehicles.

- 4.6.21. In terms of operation, the main effects of the Project on landscape and visual receptors would be from the presence of the OHL route, and the potential removal of trees (lopping only), though this has been minimised through design; some impacts, such as localised tree cutting/ pruning, are anticipated at select locations to retain clearance distances.
- 4.6.22. The assessment concluded that at the construction phase of the Project, there would be a major and significant level of effect on LCA 1: Llangynwyd Rolling Uplands, and LCA 6 Myndd Llangeinwyr Upland. CA 15: Mynydd y Gelli, CA 13: Foel Trawnant would have a major to moderate and significant level of effect during construction. At operation, it is considered that LCA 1 would also have a major to moderate and significant level of effect but this would only be localised, only when in proximity to the OHL, and would not affect the whole of the SLA, . It is also identified that the Foel Dyffryn SLA is situated within LCA 1.
- 4.6.23. The LVIA also considered the effect on 10 LANDMAP Visual and Sensory Aspect Areas (VSAAs) and concluded that during the construction phase would have a major and significant level of effect on VSAA CYNONVS473 Mynydd Baedan and VSAA CYNONVS622 Mynydd Llangeinwyr. At operation, the Project is considered to have a major to moderate and significant effect on VSAA CYNONVS473 Mynydd Baedan.

The LVIA also assessed 14 viewpoints at varying distances and directions from the Project. The viewpoints represent the main visual receptor groups found within the Study Area based on ZTV modelling

- 4.6.24. Whilst significant effects have been identified, these are inherent given the type of development proposed (ref: NPS EN-1). Policy 18 places a particular emphasis on avoiding unacceptable adverse impacts on “the setting of National Parks and Areas of Outstanding Natural Beauty”. The Project has no significant effects on national parks or AONBs (now referred to as National Landscapes). In addition, significant effects are limited to localised areas within the LCA. Whilst a matter to be included within the planning balance, the presence of significant effects upon local landscape designations is not considered to be fundamental to the consideration of the application
- 4.6.25. It should also be noted that overhead line falls within PAA No.9 for wind. Future Wales makes clear that landscapes within PAA are capable of accommodating development (onshore wind) in an acceptable way and provides a presumption in favour of large-scale wind energy development. The methodology used for defining the boundaries of the PAA areas in Future Wales specifically considered the landscape impacts of wind turbines up to 250m in height. It is therefore considered that if 250m turbines are acceptable in this landscape, then 15m H-poles should clearly be acceptable.

Cumulative Landscape and Visual Impact Assessment

- 4.6.26. The LVIA also considers the cumulative landscape effects, which are concerned with the evaluation of the effects that could be generated were the project to become operational, along with other developments that have been consented and separately with developments that have been consented and that are proposed.
- 4.6.27. The focus of the CLVIA is to identify which, if any, of the landscape or visual receptors that would not experience significant effects as a result of the introduction of the Project alone, may experience significant effects as a result of the incremental contribution of the Project to a cumulative baseline. The CLVIA assess the effects under two scenarios:

- Consented development scenario – the Project with consented schemes; and
- Application development scenario – the Project, in addition to consented development, plus schemes in planning. In reality, not all energy development proposed under the Application Development scenario will be granted planning consent. As a result, it represents a worst-case scenario that may never come to pass.

Consented Development Scenario

- 4.6.28. In terms of the cumulative landscape effects under the Consented Development Scenario, **Table 6-14 of Draft ES Chapter 6** shows that of the eight landscape character areas assessed, only one LCA (LCA 1) was found to have a Major and Significant effect. In terms of VSAs, only one, CYNONVS473 – Mynydd baedan, was found to have Major and Significant effects.
- 4.6.29. In terms of cumulative visual effects under the Consented Development Scenario, **Table 6-15 of Draft ES Chapter 6: Landscape** confirms that the project would not have a significant cumulative effect on the viewpoints assessed.

Application Development Scenario

- 4.6.30. In terms of cumulative landscape effects under the Application Development Scenario, **Table 6-14 of the Draft ES Chapter 6: Landscape** confirms that there would be a significant cumulative effect on two of the Landscape Character Areas assessed, being LCA 1 and CA 13. Of the VSAs, two VSAs would have a significant effect: CYNONVS473 – Mynydd baedan and NPTVS358 – Foel Trawsant.
- 4.6.31. In terms of cumulative visual effects under the Application Development Scenario, **Table 6-15 of Draft ES Chapter 6: Landscape** confirms there would be a significant effect on two of the viewpoints assessed.
- 4.6.32. For the western part of the overhead line, from some viewpoints, the Project does become the main contributing factor to a cumulative effect. However, whilst the Project would be noticeable and create significant effects, those effects are localised and not considered to be so severe as to be unacceptable. The proposal is for H-Poles of a maximum height of 15m. H-Poles are common features in the countryside, and whilst the introduction of them will be evident, they are not considered to be harmful to the landscape

Conclusion on Landscape

- 4.6.33. Overall, while it is recognised that the ES confirms that significant effects will occur, grid connections by their nature create landscape and visual effects, and these are inherent, given the type of development proposed (ref: NPS EN-1). The role of the decision maker is to consider the extent to which these effects outweigh the positive benefits of the project, such that the application could be considered unacceptable. The Applicant has sought to reduce the landscape and visual effect of the Project by undergrounding certain sections, particularly where these are in proximity to residential areas. Elsewhere, the choice of wood poles as opposed to steel towers enables the OHL to be visually assimilated to a greater extent than would otherwise be the case.
- 4.6.34. Policy 18 of Future Wales places a particular emphasis on avoiding unacceptable adverse impacts on “*the setting of National Parks and Areas of Outstanding Natural Beauty*”. The Project has no significant effects on national parks or AONBs (now referred to as National Landscapes).

4.6.35. Whilst significant landscape effects are identified, these are limited to localised areas within the LCA. Whilst a matter to be included within the planning balance, the presence of significant effects upon localised areas of local landscape designations is considered to give rise to minor negative weight only in the consideration of the application.

OTHER POLICY 18 CRITERIA

- 4.6.36. Policy 18 of Future Wales sets out a range of criteria for DNS applications which inform consideration of impacts. The majority of the criteria (2, 4, 6, 7, 8, 9) refer to ‘unacceptable adverse impacts’, which implies that a planning judgement has to be made to determine the acceptability (or otherwise) of any adverse impacts.
- 4.6.37. As demonstrated in **Table 4-2**, when taken as a whole, and the planning merits weighed, the Project accords with the criteria in Policy 18. (Criteria 1 has been considered above).

Table 4-2: Assessment against Future Wales Policy 18 Requirements 2-12

Policy 18 criteria	Compliance
<p>2. There are no unacceptable adverse visual impacts on nearby communities and individuals;</p>	<p>Draft ES Chapter 6: Landscape and Visual Impact assesses the likely visual impacts of the Project. The LVIA concludes that there will be a significant effect on a limited number of landscapes across the Project, be that moderate or major, largely on areas located within SLAs but these effects would be localised.</p> <p>It is considered that grid connections, by their nature, create visual effects. The landscape and visual section above details further why the Project is considered appropriate within the context of the surrounding area.</p> <p>Future Wales calls for significant weight to be attached to the positive benefits of onshore wind, which this Project directly facilitates. The significant effects identified within the ES are those which could be anticipated as arising from a development of this kind and are not so significant or widespread as to outweigh the benefits which would derive from its operation.</p>
<p>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 (IROPI), and appropriate compensatory measures have been secured);</p>	<p>Draft ES Chapter 8: Ecology examines the likely effects on internationally designated sites. The ES Chapter identifies that there are no statutorily designated international ecological sites within the boundary of the Project, with one being situated within 3km of the Survey Area.</p>
<p>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;</p>	<p>Draft ES Chapter 8: Ecology confirms that there are no nationally statutory designated sites situated within the boundary of the Project, and one is located within 2km of the Survey Area. Of the identified statutory designated sites, it is considered that it is highly unlikely for the SSSI to be subject to significant effects following the implementation of mitigation measures outlined within the CEMP.</p>

	<p>In terms of non-statutory ecological sites, it has been identified that there is one site within the Survey Area, and a further 21 sites situated within 3km of the Survey Area.</p> <p>The chapter identifies whether there are likely to be any significant effects on designated sites. While there may be a short-term impact due to the ground clearance required for the construction of the Project, in the longer term, habitat enhancement will improve the condition and provision of habitats within the Caerau West SINC and Priority Habitat across the Site resulting in no significant impacts following the application of embedded measures. The benefits will be realised during the operational phase and offset the short-term adverse effects.</p>
<p>5. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;</p>	<p>In terms of biodiversity, Draft ES Chapter 8: Ecology states enhancement of existing habitats will be undertaken to increase their conservation value. Wildflower seeding will take place in habitats with low species diversity. Long-term habitat monitoring of reinstated habitats will ensure that the Project achieves an NBB in the long term and when the Project is in its operational phase. All mitigation and enhancement measures will be agreed with the LPAs.</p> <p>Documents, including an outline Habitat Management Plan (HMP) and Outline Construction Environmental Management Plan (CEMP) have been prepared. The HMP will include details of habitat creation, enhancement and monitoring and will be secured by planning condition.</p>
<p>6. There are no unacceptable adverse impacts on statutorily protected built heritage assets;</p>	<p>Draft ES Chapter 9: Historic Environment identifies the location of historic assets within the vicinity of the Project.</p> <p>The chapter confirms that there is a total of 37 designated historic assets, within 2km of the Project, being 9 Scheduled Monuments, 27 Listed Buildings, and 1 Registered Historic Landscape. A Stage 1 Assessment was carried out for all the designated historic assets within 2km of the Project. Following the initial assessment, three scheduled monuments were scoped in for further assessment.</p> <p>Of particular note is the Clawdd Mawr Scheduled Monument, which is situated within the boundary of the Project. In line with embedded environmental measures, and following engagement with CADW, the project design includes the installation of the UGC cable below an existing trackway which crosses the Clawdd Mawr, Mynydd Caerau scheduled monument, a designated asset of high heritage significance. Construction activities will be entirely contained within the footprint of the existing track, which was widened and reinforced with aggregate as part of the construction of the Llynfi Afan Wind Farm, and has an existing series of utilities installed beneath it. Embedded measures also make provision for protective fencing during construction to avoid accidental damage to extant remains, as well as a toolbox talk for construction teams. All construction activities controlled through avoidance strategies will be secured within the CEMP. Whilst ground disturbance will occur within the boundary of the scheduled monument, this will be contained within the track and is not considered to impact any archaeological remains which contribute to the evidential value of the asset. As such, there would be no significant effect. As part of the final DNS application submission,</p>

	<p>Scheduled Ancient Monument consent will be sought as a secondary consent.</p> <p>The other historic assets identified are also considered to have no significant effect.</p>
<p>7. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;</p>	<p>Due to the nature of the project (i.e. no moving parts), there will be no shadow flicker effects.</p> <p>Impacts regarding noise and vibrations were scoped out of the EIA, as significant effects were considered unlikely. Standard mitigation measures aimed at reducing impacts, such as noise, are considered within a Noise Vibration Management Plan appended to the CEMP, and considered within Draft ES Chapter 4: Description of the Project.</p> <p>In terms of reflected light, due to the nature of the Project (wooden H-Poles with conductors and insulators and underground cables) there would be limited to negligible reflected light.</p> <p>Impacts on Air Quality were scoped out of the EIA, standard mitigation measures aimed at reducing air quality impacts are captured within the CEMP, and considered within Draft ES Chapter 4: Description of the Project.</p> <p>In terms of electromagnetic disturbance, Electric and Magnetic Fields (EMFs) arise from the generation, transmission, distribution and use of electricity and will occur around power lines. All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. The Project has a relatively low voltage of 66kV, and has been designed and phased so that there will be no significant effects related to EMFs.</p>
<p>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);</p>	<p>Due to the nature of the Project, with the maximum height of the H-Poles being 15m, there would be no effect on aviation or radar.</p>
<p>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;</p>	<p>Draft ES Chapter 7: Traffic and Transport examines the potential effects of the Project on the wider transport network. This includes access sections of the A465, A4061, and the M4. Further information pertaining to the Strategic Road Network (SRN) and Local Road Network (LRN) within the Study Area for the Project is held within Figures 7.1 and 7.2 of Draft ES Chapter 7.</p> <p>In terms of traffic movement, the phase of the project which will generate the most traffic movement is the construction phase. Appropriate management measures are set out in the Outline CTMP (Appendix 7A) to minimise impacts on all roads to be used by construction traffic, where required. It should be noted that the A4061 south of the A4107 will not be used by construction traffic and therefore is not within the traffic and transport study area.</p> <p>Some traffic movements will route from the SRN via the LRN to the construction compounds, and the Project access points, and some traffic will be inter-site, for example, from the construction compound to a specific Project access point.</p>

	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared (Draft ES Appendix 7A). This sets out the management of daily delivery profiles and controls construction vehicle movements and routing of Heavy Vehicles (HVs) to/from the site. The Outline CTMP will be developed into a final CTMP, will be secured by a planning condition and will be agreed with the Local Highway Authorities to ensure appropriate mitigation is implemented to minimise the impact of the Project on the transport network.</p> <p>Similarly, the Outline PRowWMP (Draft ES Appendix 7B) details the anticipated temporary impacts on the PRow network and identifies mitigation measures. The Outline PRowWMP will be developed into a final PRowWMP, secured by a planning condition and agreed with the Local Highway Authorities to ensure appropriate mitigation is implemented to minimise the impact of the Project on the transport network.</p> <p>Overall, Draft ES Chapter 7 concludes that with appropriate mitigation and management in place, the impact of the Project on traffic and transport is likely to be Not Significant.</p>
<p>10. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;</p>	<p>Draft ES Chapter 4: Description of Development confirms that no stone or concrete is required for the Project, as no new access tracks are being built and none is required for the construction of the OHL or UGC.</p> <p>Where soils would be excavated, they would be stored on site in accordance with the Construction Environmental Management Plan (CEMP) (see Appendix 4A), which will be updated prior to construction. Excavated materials will then be used to refill trenches. Any surplus excavated material, which is expected to be minimal, would be removed from the site in HGVs and taken to an appropriate waste recycling or disposal facility.</p> <p>The Project will only result in a very small permanent land take, which will not result in significant environmental effects in relation to land.</p>
<p>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.</p>	<p>It is very unlikely that the Project would require decommissioning. Should the Upper Ogmores Wind Farm, which the Project is connected to, cease operation in the future, the grid connection would likely remain in place as an asset that could be used to connect future energy generation in the area.</p>
<p>12. The cumulative impacts of existing and consented renewable energy schemes should also be considered.</p>	<p>Draft ES Chapter 2: EIA Approach outlines the approach that the assessment of cumulative effects has been undertaken.</p> <p>The individual chapters then assess the cumulative effect of the Project in combination with consented and planned development.</p> <p>For the western part of the overhead line, from some viewpoints, the Project does become the main contributing factor to a cumulative effect. However, whilst the Project would be noticeable and create significant effects, those effects are localised and not considered to be so severe as to be unacceptable. The proposal is for H-Poles of a maximum height of 15m. H-Poles are common features in the countryside, and whilst the introduction of them will be evident, they are not considered to be harmful to the landscape. It is also considered that the overwhelming need to reduce carbon and GHG</p>

	emissions, meet climate targets, and increase sources of renewable energy, which outweigh the potential harm of the Project, given that it directly facilitates the distribution of power from the wind farm to the wider National Grid.
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4.6.39. Section 4.3 sets out the Technical Advice Notes (TANs) considered relevant to the Project; the performance of the Project is assessed against the TANs and is described within **Table 4-3** below.

Table 4-3: Compliance with Technical Advice Notes

Technical Advice Note	Assessment of the Project
Technical Advice Note 5: Nature Conservation and Planning (1996)	Overall, it is considered that the Project would not result in significant impacts on ecology or ornithology receptors. Draft ES Chapters 8 and 9 detail further assessments undertaken.
Technical Advice Note 11: Noise (1997)	In terms of noise, given the nature of the Project, this topic was scoped out of the ES. Standard mitigation measures aimed at reducing impacts, such as noise, are considered within a Noise Vibration Management Plan appended to the CEMP, and considered within Draft ES Chapter 4: Description of the Project .
Technical Advice Note 12: Design (2016)	The Project is designed to distribute power from an approved wind farm into the national grid, with effects mitigated as far as is possible for development of this type. The Design and Access Statement , as submitted as part of this application, provides further detail about the site context and character, movement and access arrangements and considerations, and community safety. It is considered that the Project complies with TAN 12.
Technical Advice Note 24: The Historic Environment (2017)	Draft ES Chapter 9: Historic Environment concludes that, subject to the implementation of embedded environmental mitigation measures, as set out within section 10.8 of the Chapter, which includes archaeological monitoring and recording of potential non-designated archaeological remains situated within the footprint of the OHL poles and UGC, the micro-siting of OHL H-pole foundations to avoid impacting upon known designated and non-designated assets, and the protection measures implemented for Clawdd Mawr, Mynydd Caerau (GM231), the scheme will avoid significant effects to the historic environment.

ASSESSMENT OF COMPLIANCE WITH LOCAL DEVELOPMENT PLAN

4.6.40. **Table 4-4** summarises the development’s performance against the key policy criteria set out on a topic basis in the BCBC RLDP. **Table 4-5** summarises the development’s performance against the key policy criteria set out on a topic basis in the NPTCBC LDP. The conclusion of the assessment

in **Table 4-3** and **4-4** is that the proposed grid connection is compliant with both the BCBC RLDP and the NPCBC LDP.

Table 4-4: Bridgend Revised Local Development Plan

Adopted LDP Policy	Policy Summary	Compliance with Policy
<p>Policy DNP 1: Development in the Countryside</p>	<p>Policy DNP1 aims to protect the countryside from inappropriate development. The policy states that <i>“all development outside defined settlement boundaries must ensure that the integrity of the countryside is conserved and enhanced”</i>, while the policy states that overall, there is a presumption against development in the countryside. Renewable energy is listed under point 8, as an acceptable use.</p>	<p>The Project is directly linked to the previously consented Upper Ogmores Wind Farm, which is a source of renewable energy.</p> <p>As a result, it complies with the policy, which lists renewable energy as an acceptable use in the countryside.</p>
<p>Policy DNP 4: Special Landscape Areas</p>	<p>Policy DNP4 seeks to ensure that the character and quality of the County’s Landscape is protected from inappropriate development.</p>	<p>The Project traverses through one SLA within the BCBC area: Namely:</p> <ul style="list-style-type: none"> ■ SLA 1: Foel y Dyffryn (which the western section of the OHL would pass through). <p>ES Chapter 6: Landscape and Visual Impact Assessment refers to the SLA, and the visual and sensory aspect areas as outlined within the LANDMAP database that covers the SLA.</p> <p>The chapter states that VSAA CYNONVS473 Mynydd Baedan is considered to have a major to moderate and significant level effect during both operation and construction, which falls within the SLA 1, this is localised to only the OHL sections of the route and does not affect the whole of SLA designation.</p> <p>While significant effects have been identified, these are inherent given the type of development proposed. Whilst a matter to be included within the planning balance, the presence of significant effects upon local landscape designations is not considered to be fundamental to the consideration of the application.</p>
<p>Policy DNP 5: Local and Regional Nature Conservation Sites</p>	<p>Policy DNP5 seeks to provide protection to locally and regionally important areas of nature conservation, stating that the development within or adjacent to highlighted sites <i>“must be</i></p>	<p>Draft ES Chapter 8: Ecology details the local and regional sites of importance situated near the Project. One Site of Importance to Nature Conservation (SINC), Caerau West, has been identified as being present within</p>

	<p><i>compatible with the nature conservation or scientific interest of the area”.</i></p>	<p>the Study Area of the Project. The site is not situated within the bounds of the Project itself.</p> <p>Due to the nature of the Project and the proposed embedded mitigation, detailed in section 8.7 of Draft ES Chapter 8: Ecology, it is considered unlikely that the Project would result in an adverse impact on sites of local and regional importance.</p>
<p>Policy DNP 6: Biodiversity, Ecological Networks, Habitats, and Species</p>	<p>Policy DN6 aims to achieve a balance between the need for development and the need to conserve biodiversity.</p> <p>The policy states that <i>“all development proposals must provide a net benefit for biodiversity and improved ecosystem resilience”.</i></p>	<p>A Net Benefit for Biodiversity will be implemented within the Project. Enhancement of existing habitats will be undertaken to increase their conservation value. Wildflower seeding will take place in habitats with low species diversity. Long-term habitat monitoring of reinstated habitats will ensure that the Project achieves an NBB in the long term and when the Project is in its operational phase. All mitigation and enhancement measures will be agreed with the LPAs (BCBC, NPTC and RCTCBC).</p>
<p>Policy DNP 7: Trees, Hedgerows, and Development</p>	<p>Policy DNP7 recognises the importance of retaining trees and seeks to ensure that suitable trees are not harmed due to development. Where trees are to be replaced, a scheme for tree replacement must be agreed upon prior to the commencement of development, including details of planting and aftercare.</p>	<p>Draft ES Chapter 8: Ecology confirms enhancement of existing habitats will be undertaken to increase their conservation value. Wildflower seeding will take place in habitats with low species diversity. Measures will be set out in the HMP secured by a planning condition.</p>
<p>Policy SP 13: Decarbonisation and Renewable Energy</p>	<p>Policy SP13 supports renewable and low-carbon development proposals which contribute to meeting national and local renewables and low-carbon energy and energy efficiency targets.</p> <p>Part “d” of Policy SP13 specifically relates to grid connections. It states proposals will be permitted where: <i>“d) The proposal can facilitate a connection to the grid network”</i></p>	<p>The Project complies with this policy as it facilitates a connection to the grid network.</p> <p>It also complies with the other tests in the policy as it does not cause any unacceptable impacts on the natural or historic environment, and has sought to minimise the landscape and visual impact through its design and micro-siting.</p> <p>There is no unacceptable impact on access and highway safety, and there would not be an unacceptable impact on the amenity of residential properties or tourist accommodation.</p>
<p>Policy SP 18: Conservation of the Historic Environment</p>	<p>Policy SP18 aims to protect the historic environment within the County Borough. The policy states that <i>“development proposals must protect, conserve, and</i></p>	<p>Draft ES Chapter 9: Historic Environment concludes that, subject to the appropriate embedded mitigation measures being implemented, there will</p>

	<i>where appropriate, preserve and enhance historic assets”.</i>	be no significant effects on identified historic assets.
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4.6.42. The policies of relevance to the Project are identified below in **Table 4.2**.

Table 4-5: Neath Port Talbot County Borough Council Local Development Plan

Adopted LDP Policy	Policy Summary	Compliance with Policy
Policy SP 15: Biodiversity and Geodiversity	<p>Policy SP15 aims to conserve, enhance and protect important species, habitats and sites of geological interest.</p> <p>Overall, it is considered that the Project will not result in significant negative impacts on important sites for nature and biodiversity.</p>	The Project is not considered to result in significant effects on any international and national statutory designated sites provided
Policy EN 2: Special Landscape Area	<p>Policy EN2 highlights Special Landscape Areas, which are <i>“protected as far as possible from any development that would harm their distinctive features and characteristics”</i></p>	<p>The Project passes through one SLA as designated by NPTCBC, being SLA 5: Myndd Y Geli. Overall, it is considered unlikely that the project would result in an adverse impact on the SLA.</p>
Policy SP 18: Renewable and Low-Carbon Energy	<p>Policy SP18 aims to accord with national guidance and strategy and seeks to deliver proportionate contributions to meet Wales’ national renewable energy targets and energy efficiency targets.</p> <p>Point (1) of the Policy states that, where appropriate, all forms of renewable energy and low-carbon technology will be encouraged.</p> <p>Point (3) of the Policy seeks to ensure that development will not have an unacceptable impact on the environment and amenity of local residents.</p>	<p>This is confirmed within the scoping consultation response from NPTCBC, which does not note landscape as a key constraint.</p>

5 CONCLUSION

5.1 THE PLANNING BALANCE

- 5.1.1. Future Wales is clear that decision-makers must give significant weight to the need to meet Wales' international commitments and to generate 70% of the energy used from renewable sources by 2030 (since amended to now be 100% by 2035).
- 5.1.2. The Applicant is seeking consent for a grid connection which will enable the distribution of the power from the approved Upper Ogmores Wind Farm. In total, the Project proposes 4.1 km of overhead line and 4.9 km of underground cable.
- 5.1.3. The Draft ES assessed a range of environmental topics. Whilst it is recognised that the ES confirms that significant local effects will occur, this would only be in relation to the landscape and visual amenity. Grid connections, by their nature, create landscape and visual effects either during their construction, operation or both, and the role of the decision maker is to consider the extent to which these effects outweigh the positive benefits of the Project, such that the application could be considered unacceptable. Moreover, the entire connection falls within the PAA No.9 for wind. Future Wales makes clear that landscapes within PAA are capable of accommodating development (onshore wind) in an acceptable way and provides a presumption in favour of large-scale wind energy development. The methodology used for defining the boundaries of the PAA areas in Future Wales specifically considered the landscape impacts of wind turbines up to 250 m in height. It is therefore contended that if 250m turbines are acceptable in this landscape, then 15m H-poles associated with the delivery of such wind farms should clearly be acceptable in principle.
- 5.1.4. Recognition should also be given to the fact that the ES assessment commonly considers views of grid connections to be negative when the experience of the individual may often be more nuanced. This is particularly the case for this Project when the connection will use wood H-Poles, which are also only a maximum height of 15m. This means the project is likely to blend into the landscape over time to a far greater degree than higher voltage connections that require taller and more prominent structures (such as steel lattice pylons). This is not a solely OHL grid connection. Where it would come in closer proximity to residential areas, the Applicant has chosen to underground the connections, thereby removing operational landscape and visual effects.
- 5.1.5. The Project would pass through a scheduled ancient monument. The Applicant has undertaken informal consultation with PEDW to identify a route that would take advantage of an existing wind farm access track to enable the connection to be placed within this track, such that significant effects upon the SAM would be avoided. Nevertheless, additional mitigation measures during construction are also proposed.
- 5.1.6. The routing of the Project has sought to avoid sensitive sites and natural features such as trees. It is inevitable given the character of the area through which the Project would pass through however that a small number of trees would be affected but only in terms of lopping and not felling or removal of trees. The Step-Wise approach has been followed.
- 5.1.7. When the overwhelming need to reduce carbon and GHG emissions, meet climate targets, and increase renewable energy production is taken into account, which this Project is directly linked to as it enables the distribution of renewable energy from an approved wind farm, it is considered that



these factors substantially outweigh the limited significant effects identified. As a result, it is considered that consent for this grid connection Project should be forthcoming.



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