DWD

Planning, Design and Access Statement

SWANSEA BATTERY ENERGY STORAGE SYSTEM (BESS)

LAND WEST OF RHYDYPANDY ROAD, RHYDYPANDY ROAD, MORRISTON, SWANSEA

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APPENDICES

APPENDIX 1:LIST OF PLANS

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
DWD Job Number: 17906						

0.0 EXECUTIVE SUMMARY

0.1 This Planning, Design and Access Statement ('PDAS') establishes the framework of planning considerations in the preparation of a full planning application submitted to Swansea Council ('SC' or the 'Council') for the proposed construction and operation of a Battery Energy Storage System (BESS) of up to 100 megawatts ('MW') electricity capacity and associated works.

0.2 The initial introduction Section 1 (Introduction) establishes the description of the development, the purpose of the proposals, establishes an overview of the national and local policy context, and need for battery storage development. This section also outlines the main physical characteristics of the Proposed Development and describes the Site's geographical location and physical context. A background on the Applicant, Pre-Application Consultation, EIA Screening, a list of documents to be submitted with the planning application, and a subheading setting out the purpose and structure of the report conclude the introductory section.

0.3 Section 2 (The Site and Surrounding Area) of the Statement describes the Site and its key features, the planning history of relevance that relates to it, any local planning designations, any allocations that apply, and the Applicant's site selection process.

0.4 Section 3 (The Proposed Development) provides an overview of the description of the Proposed Development including its main components and development features, the need for the development, and design and access characteristics including use, amount, layout, appearance, and access.

0.5 The Design Approach (Section 4) and Design Components (Section 5) sections outline the approach taken to the design of the scheme including design principles and the evolution of the design. Analysis of the key components of the Proposed Development is undertaken through design-based review of the Site's use, the quantum of development, the proposed layout, the scale of the main structures, the appearance, and approach taken to landscaping.

0.6 Section 6 (Planning Policy Context) sets out the legislative and policy framework for determination of the Planning Application. This includes the national and local policy context of the National Development Framework: Future Wales- The National Plan 2040, Planning Policy Wales 2024, and the Swansea Local Development Plan 2010-2025, amongst other considerations.

0.7 In Section 7 (Assessment of the Proposed Development) an assessment is made as to how the proposals have been influenced by and comply with each aspect of National and Local Planning Policy.

0.8 It is concluded that the Principle of Development is supported, and that the proposals have been subject to a considered Site Selection process that necessitates the location of the Proposed Development within the Countryside.

0.9 The Assessment Section clarifies that the Proposed Development would not present an unacceptable impact on the local environment, in terms of the visual landscape impact, its scale, appearance and design, and any effect on local ecology or arboriculture.

0.10 The development includes an extensive landscaping/planting scheme and provides a biodiversity net benefit.

0.11 The impacts on the historic environment, flood risk/ drainage and highways impact have been taken into consideration, the proposals would not have any impacts on the settings of any listed buildings/heritage assets. The Site is located in an area at the lowest risk of fluvial flooding and would be drained by an incorporated SuDS feature to prevent surface water flooding. The level of impact from vehicles during the construction phase would not cause a highways safety issue and is not considered severe.

0.12 Following construction there would be minimal transport movements to and from the Site for the purposes of on-going maintenance.

0.13 It is confirmed within the amenity subsection of Section 7 relating to noise, lighting, and safety considerations that any noise generated will not exceed the conditioned noise level limits of the adjacent Swansea Greener Grid Park Development adjacent to the north, to ensure no detrimental impact on the amenities of surrounding residential properties. Similarly, lighting has been designed to ensure that it is directed downwards and the minimum necessary for security to avoid light pollution/spill or any adverse impact on neighbouring properties. Operational safety of the Proposed Development will be secured through adherence to safety management processes and procedures as set out with the Fire Safety Strategy accompanying the Planning Application.

0.14 Section 8 (Summary and Conclusions) summarises the findings of the previous sections of the Planning, Design and Access Statement, establishing that the planning balance is weighed significantly in favour of the Proposed Development. It is concluded that planning permission should be granted.

1.0 INTRODUCTION

Overview

1.1 This Planning, Design and Access Statement ('PDAS') has been prepared in support of an application for full planning permission submitted to Swansea Council ('SC' or the 'Council') for the Swansea Battery Energy Storage System ('BESS') under the provisions of the Town and Country Planning Act 1990 (as amended) ('TCPA') on behalf of Statkraft UK Limited (the 'Applicant'). DWD Property and Planning Limited ('DWD') have prepared this PDAS and are the planning agent for the application.

1.2 The Proposed Development comprises the construction and operation of a BESS of up to 100 megawatts ('MW') electrical capacity and associated infrastructure on Land West of Rhydypandy Road, Rhydypandy Road, Morriston, Swansea (the 'Site'). The Site's general location is shown in Figure 1 below and on the Site Location Plan accompanying the application (Site Location Plan- REV 01).

Figure 1: Indicative BESS Compound Location

1.3 The Proposed Development will take energy from the electricity grid at times of higher supply/lower demand and feed it back at times of lower supply/ higher demand, thus operating in either 'energy charge', 'energy storage' or 'energy discharge' modes while providing support balancing services to the National Grid. The Site, including all physical infrastructure, is located within the administrative area of SC.

1.4 The UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050, which now includes an accelerated political target of 2030 for a net zero electricity system under the Labour Government, known as Clean Power 2030.

1.5 The Welsh Government declared a Climate Emergency in 2019 and have committed to reaching net zero by 2050, with ambitions to get there sooner. SC also declared a climate emergency in June 2019 and has released a Climate Change and Nature Strategy 2022-2030. Major investment is therefore needed in proven technologies, such as renewable energy and battery storage, which is supported by planning policy at local and national level. Energy storage proposals, such as the Proposed Development, help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand. This added flexibility is key if Wales and the wider UK is to achieve widescale reliance on renewable energy.

1.6 The Proposed Development Site (the 'Site') covers an area of approximately 6.4 hectares ('ha') of agricultural land which is predominantly sheep grazed unimproved grassland. This consists of a BESS compound (the 'main site'), with areas of planting and landscaping adjacent to the southern extent of the red line. The southern extent of the red line also contains a SuDS feature, the detailed design of which will be determined by a separate SAB consent.

1.7 Through incorporation of areas of planting and landscaping and retention and enhancement for existing habitats the Proposed Development would deliver a net benefit for biodiversity.

1.8 The northern limb of the red line overlaps with the red line of the Swansea Greener Grid Park (GGP) Development and is included within the boundary extent of the Proposed Development due to the fact that this area will contain a cable route connecting the BESS to the GGP.

1.9 As such, the Swansea BESS proposal will outwardly appear as an extension to Swansea GGP but is subject to a separate planning application.

1.10 Vehicle access to the Proposed Development will be achieved via the extension of the existing National Grid access which adjoins the B4489 approximately 1.27 km west of the location of the proposed BESS platform. The extension of the National Grid access has already been consented in relation to the Swansea Greener Grid Park proposals adjacent to the north of the Site and the Swansea BESS is reached via an access point along the same extended access road.

1.11 The Site is located approximately 1.11km to the north east of the village of Cwmrhydyceirw, 1.95 km north of the village of Llangyfelach, and 2.28 km to the south east of the village of Felindre. The nearest residential property to the Site is approximately 270 m to the south at Maes-eglwys.

1.12 The Lle Predictive Agricultural Land Classification Map indicates that the likely agricultural land classification for the BESS Site is grade 3b (moderate quality), whilst the extended access track extension granted under GGP application is a mixture of 3b (moderate quality), 4 (poor quality) and 5 (very poor quality).

1.13 A permanent planning permission is sought, as the Site adjoins an existing high voltage connection and is suitable for long term supply of electricity storage services. Nevertheless, we would expect a condition to be imposed to ensure that if the Applicant chooses to cease electricity storage at the Site, the decommissioning of the electrical equipment will take place.

Statkraft

1.14 Statkraft UK Ltd is 100% owned by the Norwegian state and is Europe's largest generator of renewable energy. In the UK, Statkraft develop, own, and operate wind, solar, hydro, and Greener Grid Park projects.

1.15 Since 2006, Statkraft has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 6 GW of new-build renewable energy generation through PPAs.

Pre-Application Consultation

1.16 The Applicant undertook Pre-Application Consultation in accordance with the Planning (Wales) Act 2015. A Pre-Application advice request was submitted on 17 January and the Applicant awaits the Council's full written response on this.

1.17 Notwithstanding this, a Pre-Application Microsoft Teams meeting was held on Tuesday 4th February to understand the Council's initial views on the proposals. The feedback received at this meeting has helped inform the draft planning application proposals subject to statutory consultation.

Environmental Impact Assessment

1.18 The Applicant submitted a request for an Environmental Impact Assessment ('EIA') Screening Opinion from the Council on 23 January 2025 (Planning App Ref 2025/0152/SCR). The Applicant also awaits a written response from the Council. The draft planning application subject to statutory consultation has been prepared on the basis that the Proposed Development constitutes non EIA development.

Planning Application and Submission

1.19 The application submission consists of the following documents:

- Application Cover Letter;
- Application Form and Certificates;
- Community Infrastructure Levy ('CIL') form;
- Planning, Design and Access Statement ('PDAS') (this document);
- Pre- Application Consultation Report (Statutory Consultation);
- Statement of Community Involvement (Non- Statutory Consultation);

  Note: The above two documents have not been provided with the draft planning application as consultation is due to be undertaken. These will however be included with the final planning application submission once consultation activities have been concluded.

- Plans (the full list of plans is itemised at Appendix A of this report);
- Landscape and Visual Impact Assessment and photomontages;
- Landscape Masterplan
- Noise Impact Assessment;
- Flood Consequence Assessment;
- Heritage Impact Assessment;
- Geophysics Report;
- Preliminary Ecological Appraisal;
- A combined Transport Statement and Construction Traffic Management Plan;
- Arboricultural Impact Assessment and Tree Protection Plan;
- Fire Safety Strategy and Fire Strategy Plan;
- An External Lighting Strategy; and
- 3D Visualisations.

1.20 The application has been submitted electronically via the Planning Portal and the requisite application fee has been paid to the Council.

Purpose and Structure of this Report

1.21 The primary purpose of this PDAS is to demonstrate how the design of the Proposed Development is a suitable response to the Site and its setting, and to demonstrate that it can be adequately accessed. Furthermore, this PDAS demonstrates how the Applicant has taken account of relevant planning policy and the extent to which the Proposed Development is compliant with the statutory Development Plan.

1.22 In doing so, this PDAS draws upon and cross-refers, where relevant, to the other documents that form part of the planning application submission.

1.23 The PDAS has been prepared in accordance with Article 9 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016. Article 9 requires that all applications for major development, such as the Proposed Development, are accompanied by a 'design and access statement' that should:

- explain the design principles and concepts that have been applied to the development;
- demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
- explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;
- state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and
- explain how any specific issues which might affect access to the development have been addressed.

1.24 The above details are contained in the remainder of this document.

Structure

1.25 The remainder of this document is structured as follows:

Table 1.1: Structure of this document

SECTION	TITLE	OVERVIEW
Section 2	The Site and Surrounding Area	Describes the Site and its key features, the planning history of relevance that relates to it, any local planning designations and

		allocations that apply, and the Applicant's site selection process.
Section 3	The Proposed Development	Provides an overview of the Proposed Development, including need, use, amount, layout, appearance and access.
Section 4	Design Approach	Outlines the approach taken to the design of the Proposed Development.
Section 5	Design Components	Provides the design and access details of the Proposed Development, including layout, use, amount, scale, appearance, access and landscaping.
Section 6	Planning Policy Context	Sets out the legislative and policy framework for the determination of the planning application.
Section 6	Assessment of the Proposed Development	Provides an assessment of the Proposed Development against relevant policy at national and local level.
Section 7	Summary and Conclusions	Sets out the conclusions of this PDAS in terms of the overall acceptability of the Proposed Development.

2.0 THE SITE AND SURROUNDING

2.1 This section describes the location and key features of the Site and surrounding area, identifies any relevant planning and environmental designations.

Location, Description and Use

2.2 The Site largely comprises agricultural land located within a partially agricultural, partially energy related setting located north of the city of Swansea.

2.3 The Site is located approximately 1.11km to the north east of the village of Cwmrhydyceirw, 1.95 km north of the village of Llangyfelach, and 2.28 km to the south east of the village of Felindre. The nearest residential property to the Site is approximately 270 m to the south at Maes-eglwys.

2.4 There are a number of farmsteads scattered in the wider area, the closest of which comprises Maes Eglwys Farm which is approximately 150 m from the Site.

2.5 Felindre National Grid gas compressing station is located immediately west of the Site, and Swansea North Substation is located beyond that. The Site is otherwise surrounded by agricultural fields and areas of woodland. There are a number of constructed and approved energy projects in the wider area, further details of which can be found in the Planning History section of this chapter.

2.6 The red line boundary also includes land within the consented Swansea GGP Site which will accommodate an underground cable linking the Proposed Development to the GGP.

2.7 Some existing hedgerow field boundaries limit visibility of the Site from surrounding areas but there is considerable potential for the strengthening and addition of screening along these and other boundaries which has been included as part of the Proposed Development.

2.8 A draft landscaping proposal accompanies the draft application and a fully developed landscape masterplan will be submitted with the forthcoming full planning application submission.

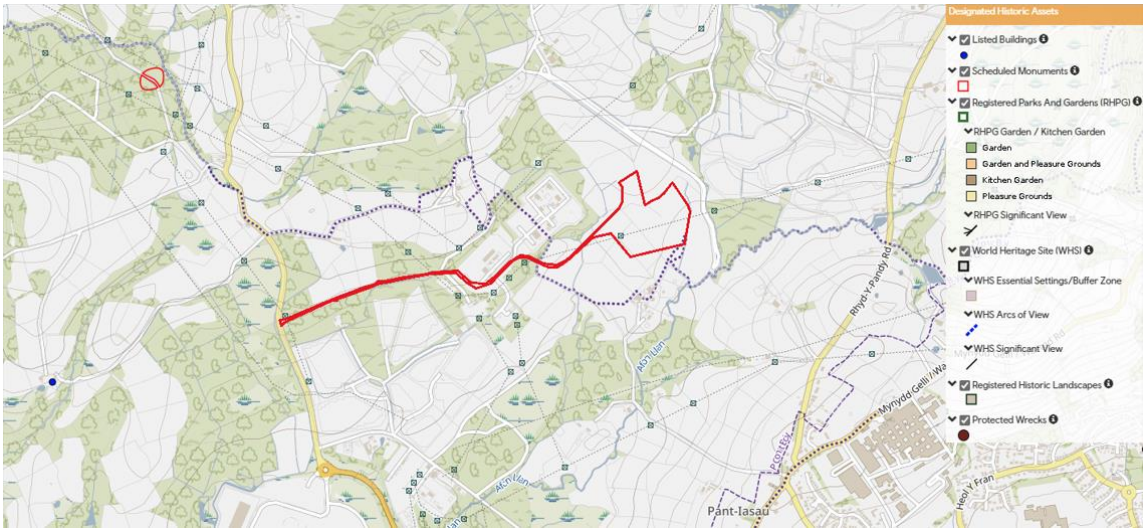
Planning and Environmental Designations

2.9 The UK Government's MAGIC Map system identifies that there are no environmental designations located on, adjacent to or in close proximity to the Site. This is shown in the extract below at Figure 2.1.

Figure 2.1: MAGIC Map Extract – Environmental Designations

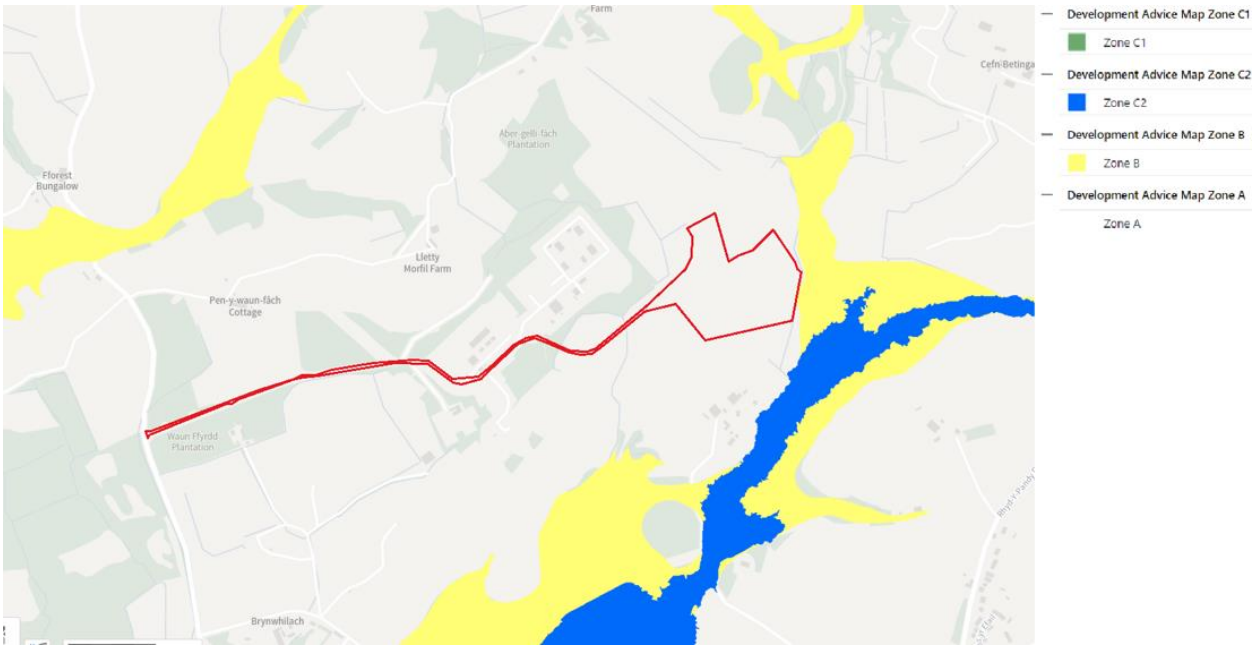
2.10 The extract from Cadw records online search included below at Figure 2.2 demonstrates that there are no heritage designations located on, adjacent to or in close proximity to the Site.

Figure 2.2: Cadw Records Online Search Extract – Heritage Designations



2.11 The 'Development Advice Map' for flood risk obtained from the Natural Resources Wales website (see Figure 2.3) shows that the site is located within Zone A, described in TAN15 as an area 'considered to be at little or no risk of fluvial or tidal/coastal flooding'. Further information can be found in the Flood Risk Assessment.

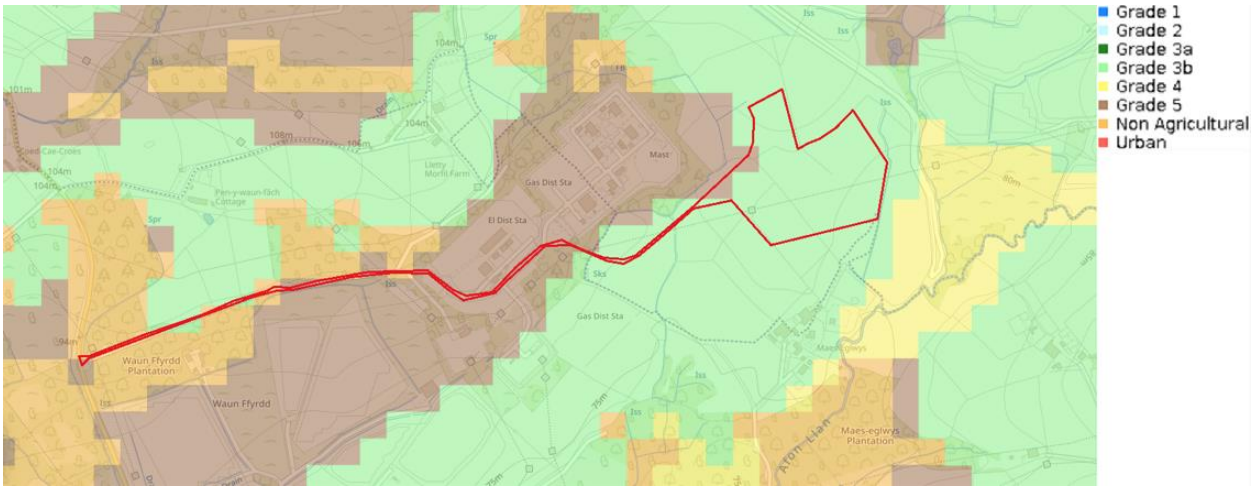
Figure 2.3: Flood Map



2.12 The available ALC data also shows the Site outlined on Figure 2.4 below to be classified as predominantly Grade 3b land. ALC Grade 3b land is not considered as Best and Most Versatile ('BMV') land.

2.13 More particularly, the likely agricultural land classification for the Swansea BESS is Grade 3b (moderate quality), while the proposed access track is predicted to be a mixture of Grade 3b (moderate quality), Grade 4 (poor quality), and Grade 5 (very poor quality).

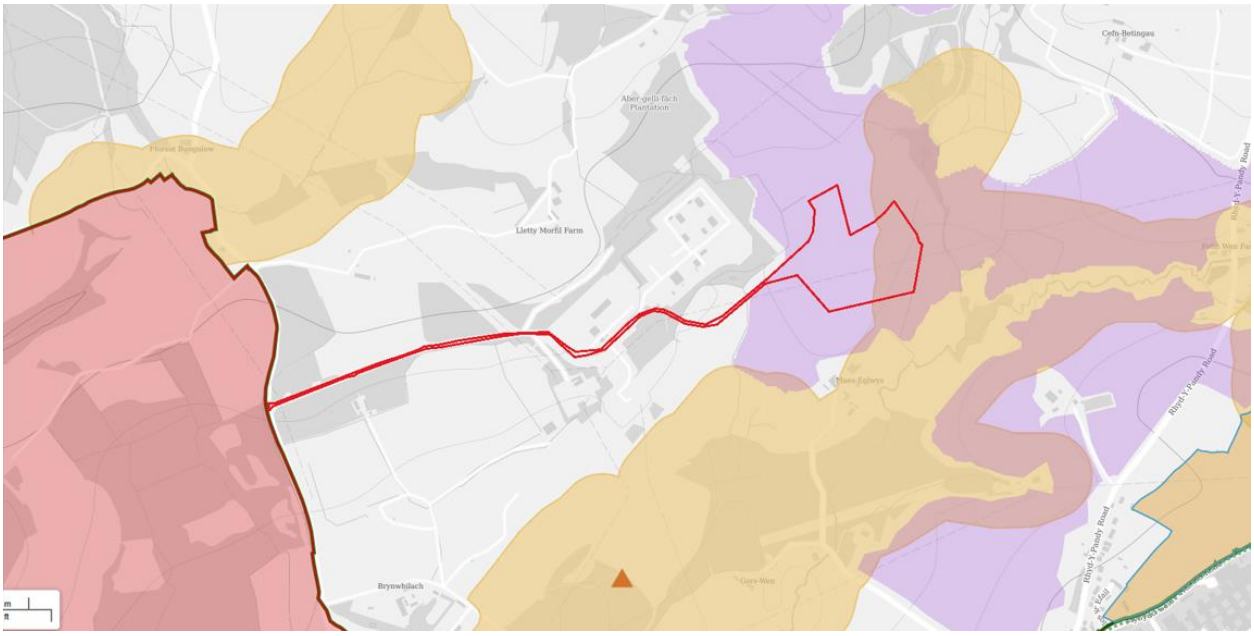
Figure 2.4: ALC Map



2.14 The local policy map below in Figure 2.5 outlines which local designations are associated with the Site and how it links to the local plan. The main Site is located entirely within a renewable and low

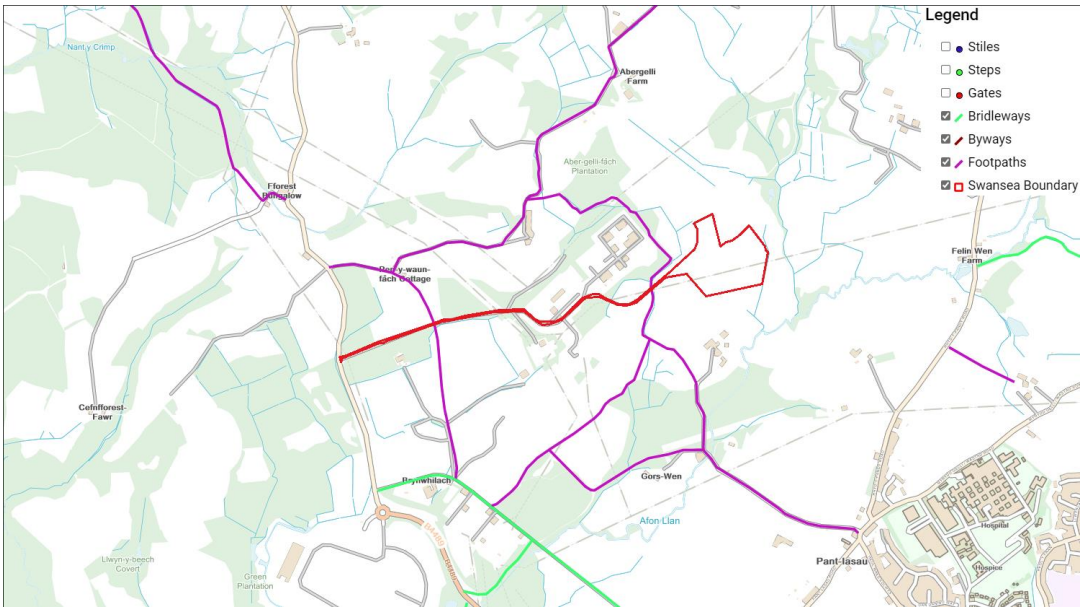
carbon energy designation (purple shading) and in the countryside (brown shading). The easternmost part of the Site is also situated within a safeguarded area for sand and gravel resources (yellow shading). The westernmost part of the access track is adjacent to a strategic development area (red shading). A sustainable waste management area represented by an orange triangle is approximately 600 m to the south west.

Figure 2.5: Policy Map



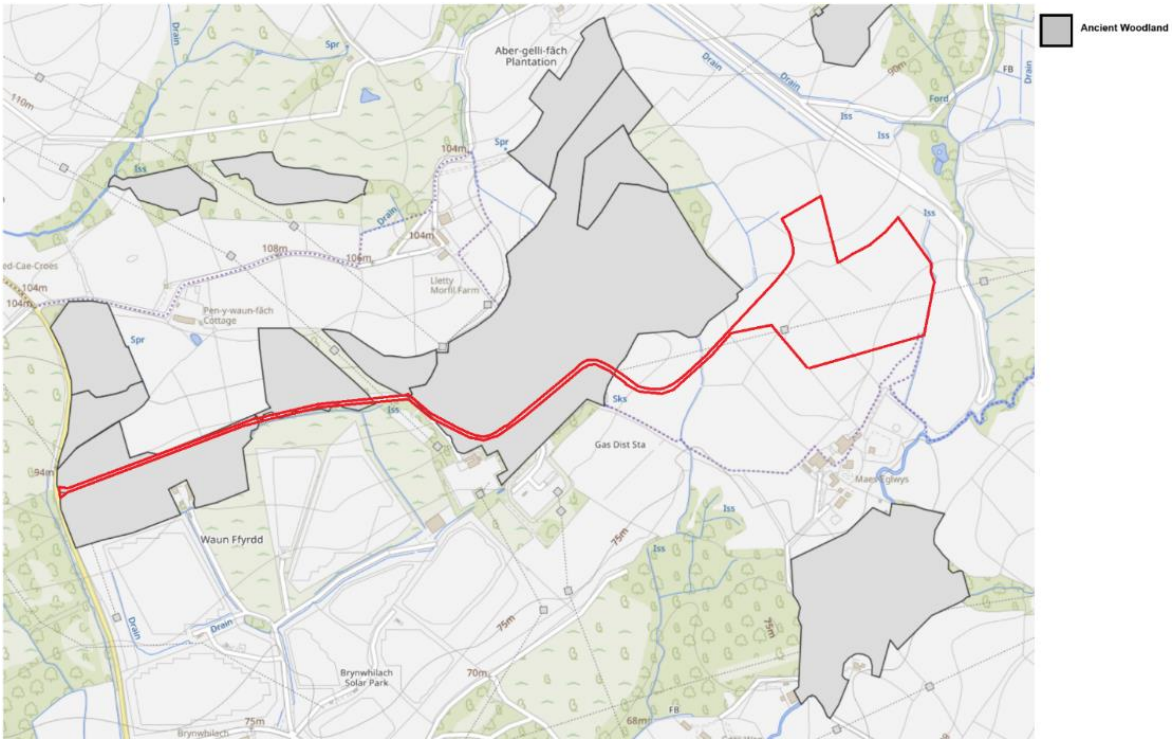
2.15 The Public Rights of Way (PRoW) map below in Figure 2.6 shows that the RLB is intercepted by footpath at two points, however only along the proposed access route. As the access route has already been consented the Proposed Development is unlikely to present any additional impacts on the PRoW.

Figure 2.6: PRoW Map



2.16 The Ancient Woodland Map below (Figure 2.7) shows ancient, replanted woodland represented in pink shading. At its nearest point the ancient woodland is approximately 40 m to the north west of the Site.

Figure 2.7: Ancient Woodland Inventory Map



Site Selection

2.17 The Development has been strategically sited adjacent to the consented Swansea GGP (LPA Ref. 2023/0889/FUL) which lies to the north of the Site. This GGP is designed to connect with the Swansea North Substation, which lies to the west of the Site.

2.18 The Swansea North Substation is capable of accommodating the transfer of electricity to and from the GGP which will provide valuable support to National Grid, protecting customers at times when high demand places stress on the local and national electricity network.

2.19 As a result of the close proximity to the GGP and Substation, the Proposed Development can be connected via a short length of underground cable to the Swansea GGP in a way that avoids any major infrastructure, minimising electricity connection and transmission costs. The small scale of the underground grid connection required will also significantly minimise construction-related disruption.

2.20 The other key criteria which have led to the Site being selected as a BESS development include:

- Adequate separation from residential properties in terms of visual and other residential amenity impacts (e.g. noise); and

- Lack of environmental constraints (e.g. absence of ecological/landscape designations, heritage designations, flood risk, etc.)

2.21 Following consideration of the above factors and the existing infrastructure within the wider area, the Site has been identified as having excellent potential for development with minimal environmental and planning constraints. The only planning or environmental designation identified on Site was the Solar PV Local Search Area under Local Development Plan Policy EU 1 (Renewable and Low Carbon Energy Proposals).

2.22 Furthermore, the principle of battery storage development within the local area has been established by the 2021 planning permission (2021/0163/FUL) for the Swansea GGP which included an element of battery storage. A proposal for *'Erection of battery energy storage system (BESS), associated infrastructure and engineering works'* was also recently granted on 6 February 2025 at a location further away from the Swansea North substation point of connection, approximately 1.81 km to the south west of the Site.

Planning History

2.23 A review of the planning history of the Site and surrounding area using the Council's public access planning register has been undertaken and found there to be a number of planning applications in the vicinity, many of which are for energy infrastructure including battery storage. Table 1 below provides a summary of the planning history for applications that relate to the Site of the Proposed Development, whilst Table 2 provides a summary of the pertinent planning applications in the surrounding area. A cumulative development plan (Cumulative Development Plan REV 02) is provided amongst the application documents which provides a visual indication of some of the applications listed in Table 2.1 and Table 2.2 below. An extract of the cumulative development plan is shown as Figure 2.8, below the planning history summary tables.

Table 2.1: Site Planning History

REFERENCE	ADDRESS	DESCRIPTION	STATUS
2025/0152/SCR	On Land West Of Rhydypandy Road Rhydypandy Road Morriston Swansea	Screening opinion for proposed 100 MW battery energy storage and associated infrastructure	Validated 23 January 2025.
2024/0756/NMA	Land West Of Rhydypandy Road Rhydypandy Road Morriston Swansea	Construction and operation of a Greener Grid Park Facility comprising synchronous	Approved 28 May 2024. Construction commenced in autumn 2024.

REFERENCE	ADDRESS	DESCRIPTION	STATUS
		compensators, transformers, generators and ancillary plant, underground electricity ducting and/or cabling to connect to the existing substation, hard and soft landscaping, access and associated works - Non-Material Amendment to planning permission 2023/0889/FUL granted 7th July 2023 to allow for amendment to the proposed landscaping	
2023/2262/NMA	Land West Of Rhydypandy Road Rhydypandy Road Morriston Swansea	Construction and operation of a Greener Grid Park Facility comprising synchronous compensators, transformers, generators and ancillary plant, underground electricity ducting and/or cabling to connect to the existing substation, hard and soft landscaping, access and associated works (Non-Material Amendment to planning permission 2023/0889/FUL granted 7th July 2023) to allow for change in the number of lighting columns within the Site boundary from six columns to 34 light columns and 40 wall-mounted lights	Approved 20 December 2023
2023/0889/FUL	Land West Of Rhydypandy Road Rhydypandy Road Morriston Swansea	Construction and operation of a Greener Grid Park Facility comprising synchronous compensators, transformers, generators and ancillary plant, underground electricity ducting and/or cabling to connect to the existing	Approved 7 July 2023

REFERENCE	ADDRESS	DESCRIPTION	STATUS
		substation, hard and soft landscaping, access and associated works	
2022/2988/S73	Land West Of Rhydypandy Road Morriston Swansea	Construction of a Greener Grid Park comprising energy storage and grid balancing equipment, including change of use from agricultural grazing land, along with associated infrastructure, landscaping and access track. Variation of condition 2 (plans) of planning permission 2021/0163/FUL granted 9th August 2021 to allow for changes to proposed equipment and layout	Approved 19 May 2023
2022/2847/SCR	Land West Of Rhydypandy Road Morriston Swansea	Battery storage / Energy management facility (EIA Screening Opinion)	EIA not required 4 January 2023
2021/0163/FUL	Land West Of Rhydypandy Road Morriston Swansea	Construction of a Greener Grid Park comprising **energy storage** and grid balancing equipment, including change of use from agricultural grazing land, along with associated infrastructure, landscaping and access track	Approved 9 August 2021
2019/2361/SCR	Land West Of Rhydypandy Road Morriston Swansea	Request for a screening Opinion for a Battery Storage/Energy Management Facility	EIA not required 6 November 2019
2018/1289/DCO	Land At Abergelli Farm Felindre Swansea SA5 7NN	Gas fired power station of up to 299MW output	Approved 19 September 2019

Table 2.2: Wider Area Planning History

REFERENCE	ADDRESS	DESCRIPTION	STATUS	LOCATION
2024/2380/SCR	Land At Abergelli Farm North East	Screening opinion - 250-megawatt (MW) battery	Awaiting decision	Adjacent to the east of the

REFERENCE	ADDRESS	DESCRIPTION	STATUS	LOCATION
	Of Felindre Swansea	energy storage system (BESS)		Proposed Development.
2024/1530/SCR	Land West Of Lletty Scilp Farm Swansea North Felindre Swansea	Screening opinion for an energy storage system (ESS) and substation.	EIA not required. Issued 23 September 2024.	Approximately 630 metres north west of the centre of the proposed development Site.
2023/0180/SCR	Land At Penllergaer Estate Bryn Bach Road Pontlliw Swansea	Screening opinion for a solar farm with battery storage and access from B4489 including associated infrastructure	Decision of EIA Not required. Issued 2 March 2023.	Approximately 2km west of the centre of the proposed development site.
2018/2021/FUL	Land At Abergelli Farm Felindre Swansea SA5 7NN	Installation of an electrical connection in the form of a new 400kV underground cable to export power from the Abergelli Power Station to the National Grid Electricity Transmission System at the Swansea North Substation, including associated engineering operations and landscaping	Approved 6 December 2018	Approximately 500 metres to the west of the centre of the proposed development Site.
2018/2020/FUL	Land At Abergelli Farm Felindre Swansea SA5 7NN	Installation of a gas connection in the form of a new above ground installation and underground gas pipeline to bring natural gas from the National Gas Transmission system to the Abergelli Power Station, including access, associated engineering operations and landscaping	Approved 6 December 2018.	Approximately 500 metres to the west of the centre of the proposed development Site.
2018/1353/SCR	Land At Abergelli Fach Farm	Screening opinion for electric connection	EIA not required	Approximately 500m to the west of the

REFERENCE	ADDRESS	DESCRIPTION	STATUS	LOCATION
	Felindre Swansea SA5 7NN		Issued 17 July 2018.	centre of the proposed development Site.
2010/0539	National Grid 400KV Substation, Heol Llangyfelach, Felindre, Swansea, SA5 7LU	Construction of proposed amenity building (11.4m long x 7.4m wide x 4.75m high) in association with the new Swansea North 400KV Electricity Substation (amendment to planning permission 2008/1685 granted on 12th November 2008)	Approved 15 July 2020.	Approximately 500 metres to the west of the centre of the proposed development Site.
2008/1685	National Grid Electricity Transmission Plc, 400KV Substation, Heol Llangyfelach, Felindre, Swansea, SA5 7LU	Construction of a new Swansea North 400KV Electricity Substation incorporating a gas insulated switchgear (GIS) building (60m long x 15m wide x 13.5m high) with separate super grid transformers (SGT), associated infrastructure works, sealing end compound and temporary lay down area and access road (amendment to planning permission 2007/2733 granted on 8th August 2008)	Approved 12 November 2008.	Approximately 500 metres to the west of the centre of the proposed development Site.
2007/2733	National Grid Electricity Transmission Plc, 400KV Substation, Heol Llangyfelach, Felindre, Swansea, SA5 7LU	Construction of a new Swansea North 400KV Electricity Substation incorporating a gas insulated switchgear (GIS) building (95m long x 23m wide x 13.5m high) with separate super grid transformers (SGT), associated infrastructure works, sealing end compound and temporary lay down area and access road	Approved 6 August 2008	Approximately 500 metres to the west of the centre of the proposed development Site.

REFERENCE	ADDRESS	DESCRIPTION	STATUS	LOCATION
2006/1222	National Grid Site, Off Heol Llangyfelach, Near Felindre, Swansea	Erection of gas compressor station comprising one 30 mw electrically driven gas compressor, two 15 mw gas driven compressors and associated housing buildings, a 20-metre vent stack, and ancillary buildings and pipework to connect the compressor station to the national gas transmission system	Approved 6 December 2006	Adjacent to the west of the proposed development site.

Figure 2.8: Cumulative Development Plan

3.0 PROPOSED DEVELOPMENT

3.1 This section provides a description of the Proposed Development, including its main components, and how it is likely to be constructed and operated.

3.2 The planning application seeks full planning permission for the following Proposed Development:

'Construction and operation of an up to 100MW battery energy storage system and associated infrastructure.'

Development summary

3.3 The Proposed Development would comprise a battery energy storage system consisting of the following equipment. The following dimensions are approximate (each component of the Proposed Development corresponds with an elevation drawing listed at Appendix 1 :

- 26 x Battery modules- 29.3m (L), 2.15m (W) and 2.6m (H) and 26 x associated inverters- 8.95m (L), 2.05m (W) and 3.75m (H);
- 2 x Control containers- 12.2 m (L), 2.5 (W) and 2.6m (H);
- 1 x Store- 6m (L), 2.4m (W) and 2.6m (H);
- 2x operations room buildings- 14.1m (L), 3.7 m (W) and 5.55m (H);
- 1 x office and welfare building - 9.75 m (L) , 3.05m (W) and 2.75m (H);
- 2 x above ground water tanks- 10m (L), 4m (W), and 2.6m (H);
- 1 x Auxiliary transformer-3.3m (L), 2.4m (W), and 2.5m (H);
- Air core reactors-1.5(Diameter) and 1.67m (H). This component is used to control current. The Proposed Battery Storage project is linked to the Swansea GGP site and these two projects have different current requirements;
- An Electric/weld-mesh steel palisade Security Perimeter Fence (up to 3.4m in height);
- Security Columns with Lighting and CCTV cameras- 6m (H);
- 1 x Diesel generator (required as an emergency power source in the instance of a power failure at the Site.);
- Extension of the existing access road from the National Grid Substation (intended to be shared with Abergelli Power Station);
- Underground Cable Connection to existing Substation;

- Control and protection systems;
- Power invertor systems including associated switch gear;
- Climate control systems;
- Habitat management planting;
- A construction compound; and
- All associated and ancillary site works necessary to facilitate the development including: all necessary drainage systems, foundations works for the above compounds, various underground cables and ducts, equipment plinths, internal services roads and other necessary infrastructure.

Need

3.4 The Development is designed to support the flexible operation of the National Grid and decarbonisation of electricity supply.

3.5 Battery energy storage proposals help to support the development of renewable energy, which is intermittent by its nature, taking energy from the grid at times of higher supply/lower demand and feeding it back at times of lower supply/higher demand. This added flexibility is key if the UK is to achieve widescale reliance on renewable energy.

3.6 Together with the GGP, the Proposed Development will provide the grid with the stability needed to accommodate more renewable energy from other sources across Wales and the national grid.

3.7 The Swansea North National Grid Substation ('the Substation') is a key strategic transmission substation and therefore is a strong point to develop and deliver grid flexibility services and grid stability for the national grid. The Substation is interconnected by 6 x 400 kV circuits and 2 x 275 kV circuits and has the option to turn in the Pembroke Walham 400 kV Circuit to create another 2 x 400kV connections.

Access

3.8 The Development will be accessed via an extension of the existing National Grid access serving the Swansea North Substation and Felindre National Grid gas compressing station. This has been consented as part of the Swansea GGP proposals.

A spur will be created to the south east of the consented extended access which allows for the development to be accessed via a private access route off the B4489, located to the west.

Cable Routing

3.9 The Proposed Development will be connected into the electricity grid by an underground cable which will connect to the under-construction Swansea GGP, which itself is to be connected to the Swansea North Substation via an underground cable.

Landscaping

3.10 The Proposed Development includes a landscaping strategy which has been designed to respect the site's landscape character and visual appeal.

3.11 Key landscaping proposals include:

3.12 Native woodland planted to the southern part of the Site (south of the overhead power lines)

3.13 A new strip of native hedgerow to the southern Site boundary, adjoining the existing hedgerows to enclose the southern part of the Site; and

- Species rich wildflower meadow planted along the National Grid wayleave and in other areas of the Site, including the verges along the access and all open space.

Construction

3.14 The construction and installation of the Development will take approximately 18 months. The sequence of construction activities is anticipated as follows:

- Site surveys & welfare;
- Construction of the access route to site;
- Earthwork for foundations/cable runs;
- Balance of plant and temporary site equipment;
- Major equipment delivery;
- Assembly of major equipment;
- Installation of supporting equipment; and
- Testing and commissioning.

3.15 During the construction period, it is anticipated that there will be approximately 98 two way vehicle movements to the Site per day at the peak of construction.

Operation

3.16 The Battery Storage facility will be operated remotely, with occasional inspection and maintenance visits which will occur on average once per month. The proposed welfare facility for visiting staff will contain a WC with a sealed septic tank so that no foul drainage connection is required.

4.0 DESIGN APPROACH

4.1 This section sets out the approach that the Applicant has taken to the design of the Proposed Development.

Design Principles

4.2 The main design principles adopted by the Applicant are:

- Design Principle 1: Seek to assimilate the Proposed Development into the local landscape and to achieve visual coherence with existing development
- Design Principle 2: Ensure safe and efficient access to the public highway;
- Design Principle 3: Seek opportunities for the management and enhancement of biodiversity; and
- Design Principle 4: Position the main components to minimise environmental impact and impact on residential amenity.

Design Approach

4.3 The approach taken to the design of the Proposed Development has been informed by technical requirements of the Proposed Development and the context within which it would be situated, in addition to the opportunities and constraints presented by the Site.

4.4 The Site's immediate and wider context is characterised by a mixture of energy and agricultural uses, as well as a number of areas of ancient, replanted woodland. This woodland is approximately 40 m to the north west of the red line boundary at it nearest point and surrounds the existing Swansea North substation and the adjacent Felindre gas compressing station. Extensive landscaping has been proposed to allow the Proposed Development to be in keeping with the more natural elements of the surroundings and to reduce the potential for significant cumulative visual impacts. The general design and siting of infrastructure has been designed to respect the character of the Site whilst being practical and efficient in terms of technical and engineering considerations.

4.5 The main components of the facility will be Moss Green- RAL 6005, to blend in the Development with the adjacent substation. This will result in the Development being read as an extension to the substation rather than as a separate built form within the rural landscape.

5.0 DESIGN COMPONENTS

5.1 This section describes the key components of the Proposed Development. This includes in relation to the Site's use, the quantum of development (amount), the proposed layout, the scale of main structures, the appearance and the approach taken to landscaping.

Use

5.2 The Proposed Development is for a 100MW BESS and associated infrastructure. The location is close to existing National Grid infrastructure as well as Statkraft infrastructure, minimising the length of the connection and allowing reuse and sharing of certain elements such as the access to the public highway. The use is therefore highly suitable for its proposed location.

5.3 The Site currently comprises agricultural land (arable) in a rural fringe countryside setting. It comprises lower quality agricultural land conforming with planning policy to direct development away from higher quality grades.

5.4 The Swansea BESS has undergone extensive review to be sympathetic to its surroundings whilst being safe and functional in terms of technical and engineering considerations.

Amount

5.5 As mentioned above, the Proposed Development consists of a number of the following components (see component elevation drawings listed at Appendix 1).

- 26 x Battery modules- 29.3m (L), 2.15m (W) and 2.6m (H) and 26 x associated inverters- 8.95m (L), 2.05m (W) and 3.75m (H);
- 2 x Control containers- 12.2 m (L), 2.5 (W) and 2.6m (H);
- 1 x Store- 6m (L), 2.4m (W) and 2.6m (H);
- 2x operations room buildings- 14.1m (L), 3.7 m (W) and 5.55m (H);
- 1 x office and welfare building - 9.75 m (L) , 3.05m (W) and 2.75m (H);
- 2 x above ground water tanks- 10m (L), 4m (W), and 2.6m (H);
- 1 x Auxillary transformer-3.3m (L), 2.4m (W), and 2.5m (H);
- Air core reactors-1.5(Diameter) and 1.67m (H) . This component is used to control current. The Proposed Battery Storage project is linked to the Swansea GGP site and these two projects have different current requirements;

- An Electric/weld-mesh steel palisade Security Perimeter Fence (up to 3.4m in height);
- Security Columns with Lighting and CCTV cameras- 6m (H);
- 1 x Diesel generator (required as an emergency power source in the instance of a power failure at the Site.);
- Extension of the existing access road from the National Grid Substation (intended to be shared with Abergelli Power Station);
- Underground Cable Connection to existing Substation;
- Control and protection systems;
- Power invertor systems including associated switch gear and transformers;
- Climate control systems;
- Habitat management planting;
- A construction compound; and
- All associated and ancillary site works necessary to facilitate the development including: all necessary drainage systems, foundations works for the above compounds, various underground cables and ducts, equipment plinths, internal services roads and other necessary infrastructure.

5.6 In addition, a landscaping scheme has been designed. The amount of screening proposed is determined by the extent necessary to effectively obscure the Site from public vantage points and the quantum of planting necessary to deliver a significant net benefit for biodiversity.

5.7 In total, all of the Proposed Development is considered to be the minimal level of development necessary to ensure that the Site performs effectively with regards to its main purpose of stabilising the electricity grid.

Layout

5.8 Throughout the design process, the site layout has been assessed by planning and environmental specialists in respect of, landscape and visual, cultural heritage, ecology, flood risk and drainage, and traffic considerations. Site surveys have identified the presence or absence of potential environmental constraints and opportunities. This analysis in conjunction with the feedback received from SC has informed the layout of the Site. There are technical factors which limit the extent to which the layout and design of the Proposed Development can be adjusted, however the

design iterations to the site layout have ensured that the Proposed Development has as little impact on the locality as possible.

Scale

5.9 The scale of development at the Site is in part determined by the equipment necessary to effectively operate the BESS most efficiently.

5.10 The tallest structures comprise the security columns with Lighting and CCTV cameras which are 6m in height. The heights of these structures are not out of keeping with existing building heights in the area and would be less than the 10.85m and 7m heights of HV equipment and energy management buildings at the consented Swansea GGP Site adjacent to the north. The security columns would also be dwarfed by existing electricity pylons and the approved Abergelli Power Station.

5.11 Significant landscaping will provide screening when it matures and help the Proposed Development assimilate into the landscape over time. There are very few vantage points within the locality, these are limited predominantly from public rights of way to the west and south of the Proposed Development Site. When viewed from nearby vantage points the scale of development would not be overbearing due to its comparatively low profile.

Appearance

5.12 The visual appearance of the buildings, e.g. the office and welfare building, operation rooms, store and fence will be finished in Moss Green- RAL 6005. This was chosen because it is visually sympathetic to the surrounding countryside and provides a similar aesthetic to agricultural barns which are established part of the built vernacular at this location.

5.13 Cabling between the Swansea BESS, the Swansea GGP and the Swansea North Substation would be underground meaning that there would be no visual impact associated with this element of the Proposed Development.

Access

5.14 As mentioned above, the Proposed Development will be accessed via an extension to the existing National Grid access, much of which will be shared with the under construction GGP, with a new spur to provide access east into the main compound of the Development.

5.15 The Development will be accessed via a new track which will run from the west of the main compound through the agricultural fields to the south of the substation, then north through the

substation to join the existing private road which connects the substation to the B4489.This access track has already been consented via the Swansea GGP proposals (2023/0889/FUL).

Safety

5.16 A Fire Safety Strategy has been submitted with this planning application. The contents of the document outline the inherent safety features embedded into the design of the Site that is in line with industry best practice, guidance, and provides multiple layers of control to reduce risks to as low as reasonably practicable. The safety features employed provide for monitoring, detection, and should those fail, then suppression and separation to reduce impacts in the rare instance of a fire event. Through a rigorous assessment of safety, the Applicant has demonstrated a risk aware approach to the Proposed Development, where the primary focus throughout the project lifecycle is safety and protection of the local environment. As such the prepared Fire Safety Strategy confirms the following:

- The Applicant has actively addressed the requirements of the National Fire Chief Council's (NFCC) guidance for battery energy storage systems (i.e. 'Grid Scale Battery Energy Storage System planning – Guidance for FRS' (2023).
- The safety features embedded in the design and operating procedures are based on current good engineering practice and the most relevant industry standards and codes (UL9540A, NFPA 855). These minimise the fire risk at the installation to As Low as Reasonably Practicable.
- The risk to personnel and first responders in an unlikely event of a major fire will be managed effectively through an Emergency Response Plan (ERP).
- The design and safety measures will be discussed, developed and agreed with MAWWFRS.
- Effective vehicular circulation is provided around the perimeter of the BESS site.
- The risk to general public is negligible due to the location and design of the site.
- All internal access routes have been tracked to ensure dimensions are suitable for use by fire service vehicles and include suitable passing places (where necessary).

6.0 PLANNING POLICY CONTEXT

6.1 This section provides an overview of the relevant planning policy and guidance at the local and national level. The Proposed Development has been influenced by these policies and is assessed against at Section 7 of the PDAS.

6.2 The planning application would be determined in accordance with section 70(2) of the Town and Country Planning Act 1990 (as amended), which states that in dealing with applications, local planning authorities shall have regard to the provisions of the statutory development plan and to other material considerations.

Local Planning Policy

6.3 The statutory development plan for the site is the Swansea Local Development Plan ('LDP') 2010-2025 which was adopted on the 28 February 2019. The following policies from the LDP are considered to be of most relevance:

- PS 1 – Sustainable Places;
- PS2- Placemaking and Place Management;
- IO 1 – Supporting Infrastructure;
- HC 1 – Historic and Cultural Environment;
- ER 1 – Climate Change;
- ER 2 – Strategic Green Infrastructure Network;
- ER 5 – Landscape Protection;
- ER 8 – Habitats and Species;
- ER9 – Ecological Networks and Features of Importance for Biodiversity;
- ER 11 – Trees, Hedgerows and Development;
- CV 2 – Development in the Countryside;
- SI 1 – Health and Wellbeing;
- T 1 – Transport Measurements and Infrastructure;
- T 5 – Design Principles for Transport Measures and Infrastructure;
- T 6 – Parking;

- T 7 – Public Rights of Way and Recreational Routes;
- EU 1 – Renewable and Low Carbon Energy Proposals;
- RP 1 – Safeguarding and Public Health and Natural Resources;
- RP 2 – Noise Pollution;
- RP 3 – Air and Light Pollution;
- RP 4 – Water Pollution and the Protection of Public Resources;
- RP 5 – Avoidance of Flood Risk; and
- RP 6 – Land Contamination.

6.4 The following Supplementary Planning Guidance provides further information and guidance to clarify the policy aims of the relevant LDP policies set out above:

- The Protection of Trees on Development Sites (adopted 2016);
- City and County of Swansea Parking Standards (adopted 2012);
- Biodiversity and Development (adopted 2021); and
- Planning Obligations (2010).

National Planning Policy

6.5 Planning Policy Wales ('PPW') (12th Edition, 2024 is considered to be a material consideration. PPW sets out the land use planning policies of the Welsh Government and looks 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, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties.

6.6 PPW is supplemented by a series of Technical Advice Notes ('TANs'), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise national planning policy.

6.7 Furthermore, the National Development Framework: Future Wales – the National Plan 2040 sets out the Welsh Government's land use priorities and provides a national land use framework for SDPs and LDPs. Policy 1(Where Wales will grow), Policy 9 (Resilient Ecological Networks and Green

Infrastructure) and Policy 17 (Renewable and Low Carbon Energy and Associated Infrastructure) are considered to be of particular relevance to the Proposed Development.

Other Material Considerations

6.8 It is notable that on Monday 29th April 2019, the Minister for Environment, Energy and Rural Affairs declared a climate emergency in Wales, committing the Welsh Government to achieving a carbon neutral public sector by 2030 and coordinating the transition away from fossil fuels in other areas of the economy.

6.9 In June 2019 the Government raised the UK's ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. Decarbonising the power sector is integral to achieving this goal and will require a significant increase in the proportion of electricity generated by renewable energy.

6.10 The National Infrastructure Commission ('NIC'), official advisor to the Government on infrastructure, has recommended that in order to meet the 2050 target the energy generation mix is up to around 90% renewables.

6.11 Whilst not planning policy documents, the following, also form material considerations:

- On 13 December 2024 the UK Government committed to an accelerated political target of 2030 for a net zero electricity system under the Labour Administration through publication of a policy document known as the Clean Power Action Plan 2030[1]. This sets an ambition to hasten the Uk's progress towards the legally binding target of net zero power by 2050.
- On 4 November 2021 the UK signed the Statement on International Public Support for the Clean Energy Transition[2] at the United Nations Climate Change Conference UK 2021 (COP26) which committed to prioritising support fully towards the clean energy transition.
- The 2020 Committee on Climate Change Progress Report to Parliament[3] was published in May 2020 and provides a review of Government efforts over the previous 12 months with regards to Climate Change. To achieve low-carbon and climate-resilient infrastructure, grid flexibility and energy supply security, the report states that 'electricity networks must be strengthened across the UK to accommodate electrification of heat and transport' and recommends that the Government should implement the actions within the Smart Systems and Flexibility Plan.

[1] https://assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf
[2] https://ukcop26.org/statement-on-international-public-support-for-the-clean-energy-transition/
[3] https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/

- The Climate Change, Environment and Rural Affairs Committee of the National Assembly for Wales published its second annual report on the Welsh Government's progress on climate change in December 2019. The report confirms that emissions from the power sector in Wales are currently falling. However, the decrease in emissions in Wales has been lower than in other nations in the UK due to increases in power demand. The report indicates that further decarbonisation of the power sector is required to enable further progress on climate change.

- Welsh Government's Prosperity for All: A Low Carbon Wales (June 2019)[6], which sets out 100 policies and proposals to help meet the 2016 to 2020 carbon budget and 2020 emission reduction targets, with a view a further plan being prepared to cover the period from 2021 to 2026. The document states that 'the system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and system reinforcement to serve large peak demands.'

- In May 2019 the Committee on Climate Change published Net Zero – The UK's Contribution to Stopping Global Warming[7]. The report recommends a new emissions target for the UK: net zero greenhouse gas emissions by 2050. The Report highlights the falling cost of key renewable technologies including battery storage and advises that flexibility in the energy supply (e.g. demand response, storage and interconnection) should be encouraged by policy and regulatory frameworks.

- The UK's Integrated National Energy and Climate Plan (January 2019)[8] makes clear that in order to meet the UK's 2050 climate change target, improvements in energy efficiency and energy management are required. This includes smart technologies such as energy storage and system balancing.

- In July 2017, BEIS and Ofgem published Upgrading our Energy System: Smart Systems and Flexibility Plan[9]. The Government aims to implement the actions in the Plan by 2022, enabling the electricity system to work more flexibly and efficiently, potentially unlocking £17-40 billion in savings across the electricity system by 2050.

- The Environment (Wales) Act 2016[10] places new duties on the Welsh Government to reduce emissions and set a carbon budget for the maximum amount of net Welsh emissions for each five-year period.

6.12 There is a clear and growing body of policy support and evidence to demonstrate Wales's and the UK's commitment to decarbonising the power system. Across all of these documents it is clear that decarbonisation will be achieved through a significant increase in the proportion of electricity generated by renewable means. It is therefore equally important that there is enough provision of ancillary services to support the deployment of further renewable generation capacity.

7.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

7.1 This section of the statement provides an assessment of the Proposed Development, in order to demonstrate how it has been influenced by and accords with the relevant planning policy.

Principle of Development

Policy Summary

7.2 ER 1 (Climate Change) of the LDP states that to mitigate the effects of climate change development should promote energy and resource efficiency and increasing the supply of renewable and low carbon energy.

7.3 EU 1 (Renewable and Low Carbon Energy Proposals) of the LDP states that *"Proposals for all types of renewable and low carbon energy development and associated infrastructure … should not have a significant adverse effect on:*

a. The characteristics and features of the proposed location as a result of the siting, design, layout, type of installation and materials used;

b. Public amenity or public accessibility to the area;

c. Radar, Aircraft Operations or Telecommunications; and

d. Carbon sinks, unless it can be demonstrated that on-site loss can be adequately mitigated."

7.4 The Officer's report relating to a BESS proposal granted on 6 February 2025 (2024/1634/FUL) in Swansea clarifies that the Council consider BESS to be associated infrastructure as set out above within Policy EU 1. The report states in its principle development section that ' *In light of the fact that development is related to the provision of infrastructure associated with renewable energy.' "…it is considered that the development would not prejudice development of further renewables…"*

7.5 Paragraph 5.7.2 of the PPW states that *"Overall power demand is expected to increase as a result of growing electrification of transport and heat. 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. Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales."*

7.6 Paragraph 5.7.7 of the PPW states that "*The benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of*

paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change. The planning system should, amongst other things :

- **Optimise energy storage**

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

7.8 Finally, paragraph 5.7.12 notes that " *Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can help balance supply and demand. Proposals for new storage facilities* ***should be supported*** *wherever possible."*

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

'New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities.'

Assessment

7.10 The principle of development is heavily supported by both local and national policy due to its contribution to the development and economic growth of the City and County of Swansea and the UK. This includes adopted local policy support for renewable energy provided that it does not result in unacceptable impacts to the landscape, natural environment, public amenity or to the functioning of radar, aircraft operations or telecommunications.

7.11 The Proposed Development facilitates renewable generation by creating much needed flexibility and applicability. It is therefore a vital part of a low carbon energy system and an important piece

of infrastructure. This is critical for the transition to a low carbon future, as outlined in local and national policy. Renewable energy sources such as wind and solar power are naturally intermittent. The Proposed Development is capable of taking energy from the grid when energy supply is higher than use, such as on a particularly sunny or windy day, and feed it back onto the grid when there is more demand and/or less supply.

7.12 The Proposed Development will not have an adverse effect on the characteristics and features of the proposed location as a result of the siting, design, layout, type of installation and materials used, public amenity, or any other sensitive receptors, as set out in the remainder of this chapter.

7.13 Furthermore, it is notable that the principle of the battery storage was accepted during the approval of the 2021 GGP application- directly adjacent to the north of the Site. The Principle of development section of the Officer's report for the 2021 GGP scheme reflect on the direct reference to storage at paragraph 5.7.2 of the PPW which states that *"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.* The section adds that "*…the proposal would address an identified need for a power storage facility within the region. The provision of such facilities is recognised and supported within national planning policy."* It is concluded that "*…the development would not conflict with national planning policies nor would it conflict with the Policies within the LDP."*

7.14 Finally, the Proposed Development makes an important and necessary contribution to local electricity infrastructure to allow Swansea and Wales move to a low carbon energy system. It should be noted that paragraph 5.7.10 of the PPW advocates for new storage facilities to **be supported** wherever possible.

7.15 The remainder of this Section demonstrates that there are no unacceptable impacts associated with the Proposed Development and that the planning balance weighs heavily in favour of it. It is therefore considered that the principle of the Proposed Development complies with relevant planning policy.

Development in the Countryside

Policy Summary

7.16 PS 1 (Sustainable Places) of the LDP states that in order to deliver sustainable places and strategically manage the spatial growth of the County by complying with the LDP's sustainable settlement strategy that requires development to be directed toward defined settlement

boundaries, the character and openness of the Green Wedges to be protected and inappropriate development in the countryside to be resisted.

7.17 CV 2 (Development in the Countryside) of the LDP states that *"Outside defined settlement boundaries development will be required to ensure that the integrity of the countryside is conserved and enhanced."* It goes on to state that exceptions will be made for necessary infrastructure provision and enhancement of infrastructure networks, amongst other things.

7.18 Paragraph 3.59 of the PPW states that *"When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."*

Assessment

7.19 The Proposed Development requires a location in the countryside due to the location of the point of connection to the grid and the existing Statkraft infrastructure at this location some of which is to be shared. Due to the urgent need for deployable renewable and energy storage countryside locations (where properly assessed) are appropriate for such critical infrastructure. The Proposed Development is not considered to compromise the conservation and enhancement of the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife and wealth of its natural resources. These points are further covered in the remainder of this section and in the LVA that accompanies this application submission.

7.20 The Site comprises poor quality agricultural land which has previously been used for livestock grazing, with no known history of agricultural crop cultivation. As mentioned earlier in the report, the Lle Predictive Agricultural Land Classification Map indicates that the likely agricultural land classification for the Swansea BESS compound is Grade 3b (moderate quality), while the proposed access track is predicted to be a mixture of Grade 3b (moderate quality), Grade 4 (poor quality) and Grade 5 (very poor quality).

7.21 Given the limited agricultural value of the land and relatively small footprint of the Development, it will not result in a loss of 'best and most versatile' agricultural land and will not materially affect the continued farming operations.

7.22 In addition, whilst the Site is located in the Countryside, its context is influenced by humanising factors in the immediate vicinity, such as small villages and settlements and energy related development. It should be noted for instance that the Swansea GGP Site is under construction adjacent to the north of the Site and that there are 3 existing solar farms with 700m of the red line to the north east and south west of the Site. The Site is also set against a backdrop of overhead power lines which connects to Swansea North 400kv substation approximately 400m to the west. The Swansea North substation is adjacent to Felindre gas compressing station and together these two energy related installations occupy a space approximately 520m wide and 210 m deep within the local landscape.

7.23 The Proposed Development will be accompanied by a variety of new planting, as proposed in the Landscape Masterplan submitted with the application. Within these areas of new and existing screening, the above ground features of the Proposed Development, being the BESS Compound Area, will be bound by durable features (such as native hedgerows and trees) which help to enclose the Proposed Development. As such, the Proposed Development would appear consistent with nearby land uses, including existing screening relating to the Felindre gas compressing station and planned screening for the GGP adjacent to the north. These developments are also located within the countryside areas.

7.24 The significant benefits are considered to outweigh the limited impacts of the Proposed Development which have been mitigated to a reasonable level, as set out in the remainder of this section of the report. These benefits include:

- reducing reliance on fossil fuels and important contribution towards Net Zero targets; and
- achieving a net benefit to biodiversity for the Site

7.25 In light of the above it is considered that the Proposed Development is compliant with planning policy related to development in the countryside.

Landscape and Visual

Policy Summary

7.26 ER 5 (Landscape Protection) of the LDP states that *"Development will not be permitted that would have a significant adverse effect on the character and quality of the landscape of the County."* It

goes on to state that Special Landscape Areas will be given priority and that Landscape Impact Assessments will be required where appropriate.

7.27 Paragraph 6.3.3 of the PPW seeks to ensure that the value of all landscapes for their distinctive character and special qualities is protected.

Assessment

7.28 A Landscape and Visual Appraisal has been submitted as part of this application. It finds that overall, the Development introduces new native planting surrounding the Development. The extent of this planting is presented visually within the Landscape Masterplan accompanying this application.

7.29 The Appraisal notes that whilst introducing a change in land use from agriculture and expanding the power infrastructure in the immediate area, the position of the Development has been sensitively considered taking account of the landscape context and has the ability to be screened from views in a medium (i.e. 10-15 years) period of time and would improve the baseline landscape above its current state.

7.30 In considering the existing landscape baseline the assessment concludes that while elements of the Swansea Bay and adjacent South Wales Valleys NLCAs appear remote and tranquil, there are considerable detractors in the form of urban fringe, motorway, and large-scale power infrastructure which erodes some of these qualities within the local landscape around the Site. From analysis it is deemed that the Proposed Development would form a suitably scaled linear extension of the existing, recently installed, and consented power infrastructure in the local and wider area.

7.31 The most notable consistent impact on views is the presence of pylons and overhead lines which due to their vertical scale can be seen in many views throughout the NLCA. Given the nature of hedgerows, field boundary trees, and woodland throughout the Study Area and wider NLCA, there is visual separation between lower-lying developments such as ground-mounted solar which is often fully screened at eye level from sensitive receptors.

7.32 Based on the addition of the Proposed Development, there would be no notable change to the existing landscape pattern or how it is perceived in relation to the existing baseline, or cumulatively with other consented development. The landscape planting proposals embedded within the Proposed Development would provide mitigation and enhancement that would not only provide screening to the BESS facility but would also serve as a buffer to nearby cumulative sites in the area from sensitive receptors.

7.33 In conclusion, it is assessed that the Proposed Development could be accommodated at the Site with very limited and localised effects on landscape character and visual amenity.

7.34 In light of the above it is considered that the Proposed Development is compliant with planning policy related to landscape and visual impact.

Scale, Appearance and Design

Policy Summary

7.35 PS 2 (Placemaking and Place Management) of the LDP states that *"Development should enhance the quality of places and spaces and respond positively to aspects of local context and character that contribute towards a sense of place. The design, layout and orientation of proposed buildings, and the spaces between them, should provide for an attractive, legible, healthy, accessible and safe environment."*

7.36 IO 1 (Supporting Infrastructure and Planning Obligations) of the LDP states that *"Development must be supported by appropriate infrastructure, facilities and other requirements considered necessary as part of the proposal."*

7.37 Paragraph 3.9 of the PPW states *"The special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement."*

Assessment

7.38 Information on the scale, appearance and design of the Proposed Development can be found in sections 3 (Proposed Development), 4 (Design Approach) and 5 (Design Components) of this report, along with the submitted plans.

7.39 The Site is not subject to any locally, nationally or internationally important landscape designations.

7.40 The scale and design complies with Policy PS2 of the LDP and Paragraph 3.9 of the PPW in its contribution to mitigating impact on views and landscape character. Given the tallest element of the Proposed Development would extend 6m (above ground level or 'AGL'), being the security columns with lighting and CCTV, it is not considered that the Proposed Development would not be of a scale to be incongruous with other development in the vicinity, such as the existing Swansea

North Substation and Felindre Gas compressing Station, the surrounding solar farms and residential settlements.

7.41 The Proposed Development has been designed so as to practically fulfil its purpose of storing electricity in a safe and economic manner. However, it has also been designed as far as possible to avoid adverse impacts by ensuring sensitive siting and layout which is compatible within its location, together with maintaining the quality of the area by retaining existing hedgerows and trees and introducing landscaping. The submitted Landscape Masterplan proposes the reinforcement of existing hedgerows and areas of planting to the southern part of the red line, further enhancing the appearance of the Site and contributing to the landscape character within the locality.

7.42 Further to the above, the proposed materials and finishes to be used at the proposed BESS compound will be similar to those of surrounding land uses, such as the under-construction GGP to the north. Specific colours, such as Moss Green -RAL 6005 will be used for the fencing and elements of site infrastructure to maximise the assimilation of the development into the landscape.

7.43 As demonstrated in Sections 3, 4 and 5 of this report, it is considered that the Proposed Development is high quality, safe and efficient, with all potential adverse impacts being mitigated insofar as is possible. Specific mitigation measures have been proposed to reduce anticipated impacts to an acceptable level in all elements of the proposal and these are covered in the remainder of this report.

7.44 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to scale, appearance and design.

Biodiversity

Policy Summary

7.45 ER 2 (Strategic Green Infrastructure Network) of the LDP states that *"Green Infrastructure will be provided through the protection and enhancement of existing green spaces that afford valuable ecosystem services."*

7.46 ER 8 (Habitats and Species) of the LDP states that development proposals that would have a significant adverse effect on the resilience of protected habitats and species will only be permitted where the need outweighs the harm, there are no satisfactory alternatives and unavoidable harm is minimised by mitigation.

7.47 Biodiversity enhancements in Wales are sought under the Section 6 duty of the Environment (Wales) Act 2016 which requires local authorities to maintain and enhance biodiversity and

promote ecosystem resilience. PPW provides further policy that seeks to ensure local authorities meet the Section 6 duty.

7.48 Paragraph 6.4.3 establishes that " *The planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Recognising 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, resulting in enhanced well-being."*

7.49 Paragraph 6.4.5 explains that *" A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the Site."*

7.50 Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales also seeks to ensure the enhancement of biodiversity.

Assessment

7.51 A Preliminary Ecological Appraisal Report has been submitted alongside this application which evaluated the potential of the Proposed Development to have potential adverse effects on a number of habitats and species, as well as setting out the requirements for further survey and proposed mitigation/compensation as necessary.

7.52 It also set out the proposed enhancements, namely:

- Sowing areas of open space with an other neutral grassland and wildflower seed mix to improve the condition of existing other neutral grassland from poor to good;
- Restoration of defunct hedgerows along the boundaries of the Site to raise their condition from poor to good;
- 0.5km of new species rich native hedgerow planting;
- 1.1ha of new lowland mixed deciduous woodland planting;
- Bird boxes and bat boxes to be installed on Site;
- Provision of an additional hibernaculum for the benefit of common reptiles and amphibians;

- Provision of 2 x insect hotels within open areas of the Site identified for grassland and wildflower sowing; and
- The design and implementation of a sensitive lighting scheme, designed in conjunction with a lighting engineer and an ecologist, to ensure that habitats created/retained for biodiversity are not indirectly degraded by light pollution.

7.53 Based on the proposed habitat and enhancement measures set out above and in the context that the measures for further survey and mitigation set out within the Preliminary Ecological Appraisal accompanying the application are adopted. The Proposed Development is capable of providing a net benefit for biodiversity as sought by the Section 6 duty of the Environment (Wales) Act 2016 and related guidance as set out by Planning Policy Wales.

7.54 Notwithstanding this, a Landscape and Ecological Management Plan (LEMP) will be produced specifying how existing habitats (grassland, hedgerows) will be enhanced and how new habitats (woodland, hedgerows) will be created as well as how these habitats will be managed in the long term.

7.55 The Applicant would be willing to accept an appropriately worded condition to secure a LEMP as per condition 5 of the 2023/0889/FUL Greener Grid Park consent.

7.56 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to biodiversity.

Trees

Policy Summary

7.57 ER 11 (Trees, Hedges and Development) of the LDP states that "*Development that would adversely affect trees, woodlands and hedgerows of public amenity or natural/cultural heritage value, or that provide important ecosystem services, will not normally be permitted*." It goes on to state that Ancient Woodland will receive specific protection.

7.58 Paragraph 6.4.25 of the PPW states that "*Planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function*."

7.59 Paragraph 6.4.26 of the PPW states that "*Ancient woodland and semi-natural woodlands and individual ancient, veteran and heritage trees are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value*."

Assessment

7.60 A Tree Survey and Impact Assessment and accompanying Tree Protection Plan and Tree Constraints Plans have been prepared in support of the application.

7.61 The Tree Survey and Impact Assessment concludes that the Proposed Development results in the loss of very few trees, none of which are of exceptional value.

7.62 Some impact of root protection areas occurs to secure access roads. The impact has the potential to check the vitality of the nearby trees (again they are not of exceptional quality) but this also has the potential to deliver a diverse array of resources for biodiversity.

7.63 Services and utility installation can be sited remote from trees but if they do need to be located within root protection areas specialist measures can be deployed for their installation to minimise harm to retained trees.

7.64 Extensive new and replacement tree planting is provided as part of these development proposals. This net gain of tree cover within the Site provides a material contribution to local green infrastructure.

7.65 The application proposals recognise the important contribution trees make to the character and quality of built environments, and the role they play to help mitigate and adapt to climate change. The proposals seek to retain existing trees, where possible, and integrate new trees in accordance with the requirement of local and national planning policy.

7.66 In addition, the Proposed Development does not either directly or indirectly impact the nearby Ancient replanted Woodland. No Ancient Woodland is contained within the Site.

7.67 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to arboriculture and protection of trees and ancient woodland.

Traffic and Transport

Policy Summary

7.68 T 1 (Transport Measures and Infrastructure) of the LDP states that *"Development must be supported by appropriate transport measures and infrastructure"* and does on to provide further detail of

what may be required of specific proposals where relevant. T 5 (Design Principles for Transport Measures and Infrastructure) provides further design principles.

7.69 T 6 (Parking) of the LDP states that *"Proposals must be served by appropriate parking provision, in accordance with maximum parking standards, and consider the requirements for cycles, cars, motorcycles and service vehicles."*

7.70 T 7 (Public Rights of Way and Recreational Routes) of the LDP states that *"Development that significantly adversely affects the character, safety, enjoyment and convenient use of a PROW will only be permitted where an acceptable alternative route is identified and provided."*

Assessment

7.71 A Transport Statement & Construction Traffic Management Plan Document has considered the likely impact of traffic generated by the Proposed Development on the local road network.

7.72 Construction of the Proposed Development will generate approximately 98 vehicle movements per day at the peak of construction. It is expected that during the peak month of construction (Month 6), 50 two-way HGV movements per day will occur per day. A further 48 car / LGV trips would be created by construction staff travelling to and from the site.

7.73 The increase in traffic generation due to construction traffic was calculated. This noted that the impact of construction traffic on the B4489 will not lead to operational difficulties. On this basis, and due to the lack of sensitive receptors on the access route, the impact on traffic generation due to construction is therefore negligible.

7.74 Traffic management procedures have been proposed within this report which would ensure the safe operation of the approach route to the proposed development during construction. Determination of the final details of these traffic management measures will occur once the Principal Contractor has been appointed and can be secured via an appropriately worded planning condition.

7.75 The Proposed Development will not be manned, operational traffic is expected to be minimal and would be conducted by smaller vehicles. The impact of this on the wider road network will be negligible.

7.76 Overall, the Proposed Development will lead to a temporary increase in traffic volumes within the study area during the construction phase only, however this can be appropriately and effectively managed.

7.77 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to traffic and transport.

Flood Risk and Drainage

Policy Summary

7.78 RP 4 (Water Pollution and the Protection of Water Resources) of the LDP states that *"Development that compromises the quality of the water environment, or does not comply with good water resource management, will not be permitted.*

Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements to water quality. SuDS must be implemented wherever they would be effective and practicable.

Watercourses will be safeguarded through green corridors/ riparian buffers: to protect water quality and water habitats and species; and to provide for flood plain capacity.

Development proposals that would have a significant adverse impact on biodiversity, fisheries, public access or water related recreation use of water resources, will not be permitted."

7.79 RP 5 (Avoidance of Flood Risk) of the LDP states that *"In order to avoid the risk of flooding, development will not be permitted:*

i. In areas at risk of fluvial, pluvial, coastal and reservoir flooding, unless it can be demonstrated that the development can be justified in-line with national guidance and is supported by a technical assessment that verifies that the new development is designed to alleviate the threat and consequences of flooding;

ii. In areas at risk of flooding from local sources, unless the Council is satisfied with the proposed drainage strategy;

iii. Where it would lead to an increase in the risk of flooding on the site or elsewhere from fluvial, pluvial, coastal or increased water run-off from the site;

iv. Where it would have a detrimental effect on the integrity of existing fluvial, pluvial or coastal flood defences;

v. Where it would impede access to existing and future tidal and fluvial defences for maintenance and emergency purposes; or

vi. *Where the proposal does not incorporate environmentally sympathetic flood risk mitigation measures, such as SuDS, unless it can be demonstrated that such measures are not feasible."*

7.80 Paragraph 6.6.19 of the PPW states that *"Development proposals should incorporate design for surface water management, based on principles which work with nature to facilitate the natural functioning of the water cycle, providing issues such as land contamination would not result in the mobilisation of contaminants which may have an impact over a wider area."*

Assessment

7.81 A Flood Consequence Assessment has been submitted as part of this application which has been carried out in accordance with TAN15. The site is located within Flood Zone A, described in TAN15 as an area 'considered to be at little or no risk of fluvial or tidal/coastal flooding' on the Welsh Government's Development Advice Map.

7.82 The risk of fluvial, surface water, and artificial flooding are considered to be Very Low, and the risk of groundwater flooding is considered to be Low. Tidal and sewer flooding are both discounted.

7.83 Flood risk management measures will be put in place to ensure that the risk of flooding to areas downstream of the site are not increased as a result of the development. This will include a surface water drainage strategy that will mimic greenfield performance for a range of storm events.

7.84 A Surface Water Management Plan will demonstrate that on-site attenuation will be provided by Sustainable Drainage Systems (SuDS) features to accommodate flows in exceedance of the discharge rate up to and including the 1 in 100-year storm event, including an appropriate allowance for climate change.

7.85 As the risk of flooding to the site is generally considered to be Low to Very Low, and the risk of flooding to surrounding areas will not increase as a result of the proposed development, it is considered that, from a flood risk and drainage perspective, the site is suitable for the type of development proposal.

7.86 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to flood risk and drainage.

Contaminated Land

Policy Summary

7.87 RP 6 (Land Contamination) of the LDP states that *"Development proposals on land where there is a risk from actual or potential contamination or landfill gas will not be permitted unless it can be*

demonstrated that measures can be taken to satisfactorily overcome any significant risk to life, human health, property, controlled waters, or the natural and historic environment."

Assessment

7.88 The Applicant notes that there is a former landfill site (LF:024: Gorswen Farm) some 260m to the south of the site. In the officer's report for the 2021/0163/FUL GGP Permission it was stated that *"in view of the potential hydrological connection to designated sites it is considered, following a precautionary approach, that a condition should be included in relation to the unsuspected contamination at the site."* This condition was as follows:

"If, during the course of development, contamination not previously identified is found to be present at the site no further development, unless previously agreed in writing with the Local Planning Authority, shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, a detailed strategy for dealing with said contamination. The development shall thereafter be implemented in accordance with the approved strategy.

Reason: In the interests of health and safety and to protect the environment."

7.89 This condition has since been applied to subsequent permissions at the GGP Site including 2023/0889/FUL.

7.90 The Applicant would be satisfied to add the same condition to any forthcoming decision notice relating to the Proposed Development.

7.91 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to contaminated land.

Historic Environment

Policy Summary

7.92 HC 1 (Historic and Cultural Environment) of the LDP sets out how the County's distinctive historic and cultural environment can be preserved and enhanced, including by high quality design standards responding positively to local character and distinctiveness and the safeguarding of heritage assets and their settings.

Assessment

7.93 A historic impact assessment has been prepared that has considered the likely impact that the Proposed Development would have on potential archaeological remains and the setting of historic assets within the study area.

7.94 With regards to archaeological remains, it is evaluated that there is a low potential impact on buried archaeology. This is evidenced through the undertaking of a Geophysical survey which has not identified any significant archaeological features. It is evaluated that if deposits are present that these are thought to be of agricultural origin and likely post medieval in date. As such the deposits are likely to be of low importance.

7.95 The Assessment outlines that the Proposed Development will present direct impacts on surviving historic field boundaries to the northern extent of the red line. The proposals will subsequently alter the landscape grain to a small degree but only within this limited area.

7.96 In relation to setting impacts on above ground heritage no adverse impacts are anticipated on the setting of any designated heritage assets. This is predominantly due to the separation distance between the Site of the Proposed Development and any designated heritage assets, with the nearest designated heritage assets being Cefnfforest-fawr' (Ref: 26238)- a grade II listed building 900m from the Site and a scheduled monument Earthwork 1080m NNW of Fforest Newydd' (Ref: GM308),approximately 1km to the north west.

7.97 The Proposed Development Site is considered to have a similar locational context to the adjacent Swansea GGP site adjacent to the north. Comments within the Officer's report for decision notice 2023/0889/FUL on impact on heritage assets concluded that *'In view of the prevailing topography, the existing screening and separation distances to the… '…heritage assets, it is not considered the development would result in any material adverse impact on these assets.'*

7.98 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to the historic environment.

Public Amenity

Policy Summary

7.99 RP 1 (Safeguarding Public health and Natural Resources) of the LDP states that *"Development will not be permitted that would result in significant risk to: life; human health and wellbeing; property; controlled waters; or the natural and historic environment, particularly in respect of air, noise or light pollution"* amongst other things.

7.100 RP 2 (Noise Pollution) and RP 3 (Air and Light Pollution) of the LDP provide further information with respect to noise, air and light pollution.

7.101 Paragraph 6.7.6 of the PPW states that *"In proposing new development, planning authorities and developers must, therefore:*

- *address any implication arising as a result of its association with, or location within, air quality management areas, noise action planning priority areas or areas where there are sensitive receptors.*
- *not create areas of poor air quality or inappropriate soundscape; and*
- *seek to incorporate measures which reduce overall exposure to air and noise pollution and create appropriate soundscapes."*

7.102 Paragraph 6.7.26 of the PPW states that *"Planning authorities must consider the potential for temporary environmental risks, including airborne pollution and surface and subsurface risks, arising during the construction phases of development. Where appropriate planning authorities should require a construction management plan, covering pollution prevention, noisy plant, hours of operation, dust mitigation and details for keeping residents informed about temporary risks."*

Assessment

7.103 The Proposed Development would be sited a significant distance from existing residential properties such that the development would not result in any material overbearing, overshadowing or overlooking impacts upon nearby residential properties. The only concern relating to public amenity as a result of the Proposed Development is noise.

7.104 The Applicant submits as part of this application a Noise Assessment Report. This explains that to assess the impact of operational noise emissions from the Proposed Development, the noise consultant has produced a noise propagation model to predict the noise emission levels at the nearest identified residential receptors.

7.105 Noise modelling is based on candidate plant typical for the size and class of the Proposed Development. This assumes that all plant will be operating continuously and concurrently, however, this is unlikely to occur for the majority of the time and the noise assessment results are subsequently inherently conservative.

7.106 A number of noise sensitive receptors (NSRs) in the form of residential properties have been assessed against the noise propagation model. The assessment has been undertaken in accordance with BS 4142 against a set of Target Rating Levels derived with reference to the already conditioned levels assigned to the consented neighbouring Swansea GGP development. Cumulative noise inclusive of the nearby solar, grid stability and electrical infrastructure schemes was also considered in the assessment.

7.107 The predicted cumulative BS 4142 Rating Levels were found to be below the Target Rating Level Limits at all receptors during the daytime and night-time periods respectively.

7.108 Accordingly, the assessment concludes that the development will not have an adverse operational noise impact on the nearby NSRs due to the ability to meet an appropriate set of target noise level limits.

7.109 In light of the above it is considered that the Proposed Development is in compliance with planning policy related to public amenity.

8.0 SUMMARY AND CONCLUSIONS

8.1 The Proposed Development comprises the construction and operation of a BESS and other associated infrastructure located on land west of Rhydypandy Road, Morriston, Swansea.

8.2 The principle of electricity infrastructure to support the grid and allow for stability in electricity supply as we move to a low carbon electricity system dominated by intermittent renewable energy sources is strongly supported by local and national planning policy. Furthermore, the UK Government has committed to meeting a legally binding target of net-zero carbon emissions by 2050 as well as strengthening the UK's security of supply. There is therefore a significant and demonstrable need for the Proposed Development.

8.3 The Applicant will be undertaking Pre-Application Consultation in accordance with the Planning (Wales) Act 2015. More information on this will be presented within the Pre-Application Consultation Report which will be submitted as part of the final planning submission.

8.4 It has been demonstrated that the principle of the Proposed Development in this location is acceptable and it complies with planning policy in relation to the countryside, public amenity, flood risk, heritage, ecology, and contaminated land The Proposed Development will make effective use of land, being located on lower quality agricultural land in proximity to and making use of existing infrastructure. The environmental and technical reports that form part of the planning application submission demonstrate that there would be no unacceptable environmental impacts, and there are a number of added benefits, including biodiversity gains.

8.5 These factors, when combined with the significant need for electricity infrastructure to support the grid and allow for stability as we move to a low carbon electricity system, mean that the planning balance (and, in particular, when considered in the context of the tests under Section 38(6) Planning and Compulsory Purchase Act 2004) is weighted significantly in favour of the Proposed Development.

8.6 The Applicant therefore respectfully requests that planning permission is granted for the Proposed Development.

APPENDIX 1: LIST OF PLANS

No.	Reference	Title
1	REV-01	Site Location Plan
2	REV-06	Proposed Site Layout 1_500
3	REV-06	Proposed Site Layout 1_2000
4	REV-06	Proposed Site Layout Contextual 1_2000
5	REV-06	Proposed Site Layout Parameters Plan 1_500
6	REV-06	Proposed Site Layout Parameters Plan 1_2000
7	REV-06	Proposed Site Layout Parameters Plan Contextual 1_2000
8	REV 02	Cumulative Development Plan
9	REV 00	Batteries and Equipment
10	REV 00	Batteries Parameter plan
11	REV 00	Control Container
12	REV 00	Operations Compound
13	REV 00	Stores
14	REV 00	Welfare and Office
15	REV 00	Above ground water tanks
16	REV 00	Auxillary Transformer
17	REV 00	Diesel Generator
18	REV 00	Perimeter Fence
19	REV 00	Gate
20	K10109-Z010-00	Air Core Reactor Plans
21	REV 00	Light column & CCTV