Glöyn Byw | Butterfly Solar Farm

Land to the North of the B5426, Wrexham

Planning Statement

Prepared for

RWE

RWE Renewables UK

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CONTENTS

TABLES

LIST OF PLANNING DRAWINGS

3456-01-01 Location Plan
3456-01-02a Planning Layout - Western Array
3456-01-02b Planning Layout - Central Array
3456-01-02c Planning Layout - Eastern Array
3456-01-03 Typical Photovoltaic Table Details
3456-01-04 Typical Battery-Inverter Station Containerised
3456-01-05 Illustrative Information Board
3456-01-06 Typical Inverter Building
3456-01-07 Typical Spares Container
3456-01-08 Typical Access Gate
3456-01-09 Typical Access Track
3456-01-10 Typical Acoustic Fencing
3456-01-11 Typical Fence, Track & CCTV Details
3456-01-12 Indicative Cable Trench Section Details
3456-01-13 Indicative Construction Compound
3456-01-14 Indicative Substation Compound Details
3456-01-15 Typical Customer Switchgear
3456-01-16 Typical Communication Mast Details

1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

1.1.1 This Planning Statement has been prepared on behalf of RWE Renewables UK ('the Applicant'), in support of a Development of National Significance (DNS) application, under Section 62D of the Town and Country Planning Act 1990.

1.1.2 The DNS application is for ***'the installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with 132 kV substation, hybrid inverter container compounds, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.'*** This new solar energy generating station and associated on-site Battery Energy Storage System (BESS) ('the Proposed Development') is proposed on land to the north of the B5426, Wrexham ('the Site'). The Proposed Development includes associated infrastructure and the connection to the Legacy National Grid substation. The current design for the Proposed Development would enable the export of up to 99.9 megawatts (MW) of electricity, as well as the storage of electricity in the BESS.

1.1.3 The Site lies wholly within the administrative area of Wrexham County Borough Council ('the Council' or 'WCBC').

1.1.4 This introductory section provides a description of the Site and its surroundings, details of relevant planning history, and the pre-application consultation exercise undertaken. It also defines the structure of the Planning Statement.

1.2 The Site and its Surroundings

1.2.1 The location of the Proposed Development is shown on Drawing 3456-01-01 Location Plan.

1.2.2 The Site is located approximately 3 km to the south of the City of Wrexham and 1.5 km to the east of Johnstown.

1.2.3 The Site is divided into three principal areas referred to as the Western, Central and Eastern Array Areas (the WAA, CAA and EAA respectively), each of which is described below. Each of the array areas are separated by approximately 1.8km and

they would be connected to each other via underground cabling, which in turn would link to a main onsite substation located within the WAA. The application also includes an underground cable connection from the onsite substation to the Legacy National Grid Sub-Station, which is located approximately 1.3km to the north of Rhosllannerchrugog.. Together, proposed cabling locations are termed the Cable Route.

1.2.4 The OS grid references for each of the array areas are:

i) WAA – 331692, 346263
ii) CAA – 333959, 345629
iii) EAA – 336679, 346129

1.2.5 The entirety of the Site, including the cable corridors, covers an area of 146 ha (of which around 102 ha of this will be fenced/panelled area and a further 16 ha would be dedicated wildflower meadow or wildlife enhancement areas).

1.2.6 The following sections describe each of the array areas and the key environmental designations relevant to each.

Western Array Areas

1.2.7 The WAA covers approximately 21ha and comprises agricultural fields bound by hedgerows, some of which contain mature trees. The WAA is located to the immediate east of the A483, approximately 1 km to the east of Johnstown.

1.2.8 A private road leads through the WAA, which provides access from Hafod Road in the west (west of the A483) to a private residential dwelling, Hafod y Bont in the east. The road is also a Public Right of Way (PRoW), footpath RUA/119. This private road is not proposed as an access route into the WAA. Access would be gained into the WAA from the B5426 to the south.

1.2.9 The nearest residential property to the Site is Hafod y Bont, located adjacent to the eastern boundary of the WAA. The property is well screened in all directions by mature trees. The Hafod House Rest Home is located approximately 220m to the west of the Site, to the west of the A483. The Hafod Industrial Estate is also located to the west of the A483, approximately 300m from the WAA boundary.

1.2.10 The Bonc yr Haford Country Park is located 215m to the west. Within the same area there is also the Stryt Las a'r Haford Site of Special Scientific Interest (SSSI) and the Johnstone Newt Sites Special Area of Conservation (SAC).

1.2.11 The WAA is not located within, or in close proximity to, a Special Landscape Area.

1.2.12 There are a number of cultural heritage assets within the vicinity of the Site. The Grade II listed properties 'Hafod House' and 'Hafod House Farmhouse' are located approximately 220m to the west of the Site and form part of the aforementioned Hafod House Rest Home. A Grade II listed 'Signpost at SW End' is located approximately 715m to the north and there are two further listed buildings north of the signpost. The Grade II listed 'Old Sontley Hall' is located approximately 1.2 km to the east. The Wat's Dyke scheduled monument is located approximately 260m to the east of the WAA, which is also a PRoW that forms part of the Wat's Dyke Way Heritage Trail (footpath RUA/120 and MAR/41).

1.2.13 The NRW Flood Map for Planning shows that the WAA is at very low risk to flooding from rivers and sea. The WAA is intersected by 2no. ditches (ordinary watercourses) which flow in an easterly direction through the Site. The Site is predominantly at very low risk to flooding from surface water and small watercourses, aside from corridors of Flood Zone 2 and 3 associated with the watercourses. Flood Zone 2 is defined as having between a 1% and 0.1% annual probability of flooding, including the effects of climate change. Flood Zone 3 is defined as having a greater than 1% annual probability of flooding, including the effects of climate change.

Central Array Area

1.2.14 The Central Array Area (CAA) covers approximately 66ha and comprises agricultural fields bound by hedgerows, some of which contain mature trees. Marchwiel Hall Road runs up the centre of the CAA which would be used to access the CAA.

1.2.15 The CAA is divided into four distinct parcels, two to the west of the Marchwiel Hall Road and two to the east. Narrow areas of woodland lie between and to the south of the two eastern parcels, these areas of woodland follow minor watercourses and the woodland is designated as Ancient Woodland. The areas of Ancient Woodland lie outside but adjacent to the boundary of the Site and are also locally designated wildlife sites.

1.2.16 There are several properties close to the southern boundary of the CAA, to the north and south of the B5426. These properties form part of the settlement of Eyton. Eyton Primary School is also located in this area, to the south of the B5426. Residential properties are located along Marchwiel Hall Road and lie close to the boundary of the CAA. Plassey Holiday Park, Retail Village and Golf Course is located to the east of the CAA.

1.2.17 Bwgan Ddu Lane runs east west approximately 200m to the north of the CAA, the cable connection between the CAA and the EAA runs along Bwgan Ddu Lane, this route is described further below.

1.2.18 The Sontley Marsh SSSI and the Erddig Park Country Park are located approximately 1.35 km and 1.7 km to the north of the Site respectively.

1.2.19 The CAA is not located within, or in close proximity to, a Special Landscape Area.

1.2.20 There are a few cultural heritage assets within the vicinity of the CAA, the nearest of which are the Grade II listed 'Former House at The Groves' and 'The Groves', located along the eastern boundary of the northern part of the CAA. The Grade II listed 'Kiln Farmhouse including former Malthouse to rear' is located approximately 400m to the north.

1.2.21 The NRW Flood Map for Planning shows the CAA is at very low risk to flooding from rivers and seas. The Central Array Area is intersected by several ditches (ordinary watercourses) associated with some areas of Flood Zone 2 and 3. The developable areas are outside of the flood extents associated with the small watercourses on or adjacent to the site. The flood extent is constrained to land immediately adjacent to the ditches.

1.2.22 No PRoW are located within the CAA. Footpath MAR/7 connects the B5426 with Marchwiel Hall Road and runs along a section of the southern boundary of the CAA.

Eastern Array Area

1.2.23 The EAA covers approximately 43ha and comprises agricultural fields bound by hedgerows, some of which contain mature trees. An area of woodland, approximately 30m in width and 350m in length, is located centrally within the EAA, this woodland is not designated as Ancient Woodland. Two blocks of Ancient Woodland are found adjacent to the boundary of the EAA, forming part of land

associated with Gerwyn Hall. Kiln Lane, a minor road, forms the northern boundary of the EAA. This would be used to gain access into the EAA.

1.2.24 There are several residential properties located along Kiln Lane, on its northern side. The aforementioned Gerwyn Hall is located immediately to the east of the EAA. A residential property and commercial premises are located to the south of the EAA. The nearest settlement to the EAA is the village of Cross Lanes, approximately 850m to the northeast. The village of Bangor-on-Dee is located approximately 1.5 km to the southeast.

1.2.25 The B5426 runs east west approximately 600 m to the south.

1.2.26 The River Dee SSSI is located approximately 635 m to the south, as is the River Dee SAC.

1.2.27 There are few cultural heritage assets within the immediate vicinity of the EAA. The Grade II listed 'Ivydale' is located approximately 870 m to the northwest.

1.2.28 The EAA is intersected by a ditch (ordinary watercourse). The ditch generally flows in a south-easterly direction. The NRW surface water and small watercourses map shows that the majority of the developable areas are outside of the flood extents associated with the ditch on site.

1.2.29 Sesswick Brook (watercourse) is located approximately 520 m south-east of the Eastern Array Area and flows north-east to join the River Dee approximately 1.4 km east of the Eastern Array Area. Sesswick Brook is situated a minimum of 10 m below the site and as such any potential flooding of this watercourse would not affect the site.

1.2.30 There are areas of the EAA shown to be within surface water Flood Zones 2 and 3, generally constrained to the location of the ditch. The risk of surface water flooding is very low across the majority of developable area of the EAA.

1.2.31 Footpath SES/6 runs through the eastern most parcel of the EAA. Footpath SES/9 runs along the southern boundary of the EAA and connects to footpath SES/6. There are a number of other footpaths within the vicinity of the EAA.

Electrical Connections

1.2.32 The Site includes the roads that connect the three solar array areas, within which cables would be laid to connect the solar farm to the main site substation, located in the WAA. The EAA would be connected to the CAA via the B5130 (Kiln Lane), Cockbank Lane, Bwgan-Ddu Lane and Marchwiel Hall Road. The CAA would be connected to the WAA via Marchwiel Hall Road and the B5426.

1.2.33 As described in the following section, the Site also includes the electricity connection from the proposed substation in the WAA to the Legacy Substation. Two routes are currently under consideration, shown on Drawing 3456-01-01 Location Plan. The planning application has assessed both routes to determine their acceptability. Planning permission is being sought for both routes however only one route would be implemented.

1.2.34 The first, the Northern Option, would route west along the B5426 from the WAA, before running north along Haford Road and Corkscrew Lane, to the junction with the B5605 (Wrexham Road). The cable would then cross Wrexham Road and proceed along Smithy Lane, before running north along Talwrn Road and then west along the unnamed B5426 to Legacy Substation entrance road.

1.2.35 The second option, the Western Option, would route west along the B5426 from the WAA towards Johnstown where it would be routed north along the B5605 (High Street/Wrexham Road). It would continue north to the junction with Smithy Lane, and then follow the same route as the Northern Option from this point to Legacy Substation.

1.2.36 The electricity connections would be located within the highway and would be constructed through open trenching. Traffic management measures would be implemented during the construction of the electricity connections.

1.3 Planning History

1.3.1 The majority of the planning history on or surrounding the Site relates to agricultural buildings and residential development. The Site and its surroundings are not subject of any planning history considered relevant to the determination of this application.

1.4 The Applicant

1.4.1 The Applicant is RWE Renewables UK, a market leading renewable energy owner/operator, with over 1 GW of solar and battery storage projects throughout the UK under construction/in operation. The Applicant places a special focus on improving local biodiversity of sites, with an average biodiversity net gain of over 50% on its sites and has a strong record of engaging with and winning the support of local communities, who in turn help to shape their developments. As a result, they have a 98% success rate in planning.

1.4.2 The RWE group is the largest power producer in Wales, and the country's number one renewable energy generator. RWE are currently involved in over 3 GW of power generation in Wales across 12 sites, of which around 1 GW is renewable. The company's existing renewable energy portfolio already generates one third of Wales' renewable energy production – enough to power 550,000 homes. RWE plays a critical role in driving Wales' decarbonisation, working in partnership with Welsh Government and wider partner organisations. Through its past and future investments RWE is helping to create a clean, affordable and secure power system, which will act as the springboard to the decarbonisation of wider economic sectors across Wales, such as industry and transport.

1.5 Pre-application Consultation and Engagement

1.5.1 Developments comprising Developments of National Significance are defined by The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016. Planning applications for developments comprising Development of National Significance are made to the Welsh Ministers and determined by Planning and Environment Decision Wales (PEDW) (formerly the Planning Inspectorate Wales). Evidence from the Applicant, the Local Planning Authority (LPA) and other statutory consultees and interested parties is considered in the decision making process.

1.5.2 The procedural guidance[1] sets out that early pre-application engagement with communities and LPAs provides an opportunity to overcome any potential issues

[1] https://www.gov.wales/sites/default/files/pdf-versions/2025/7/4/1752150920/developments-national-significance-dns-procedural-guidance.pdf *Last updated 28 May 2025.*

with the proposal. The LPA plays an important role in procedural aspects of the DNS process, such as EIA scoping.

Wrexham County Borough Council

1.5.3 Wrexham County Borough Council is the host Local Planning Authority in which the application Site is located.

1.5.4 The Applicant contacted WCBC to obtain pre-application advice on 02 July 2024. WCBC were provided with detail of the Proposed Development, the Site, the policy context and the Applicant's view on the need for the scheme. WCBC provided pre-application advice on 02 October 2024. Within this advice, it was confirmed that the Proposed Development should seek to comply with policies RE2 (Renewable Energy Schemes) and SP18 (Climate Change) of the Local Development Plan. The Local Planning Authority expressed its support for the principle of development, subject to compliance with the aforementioned policies and other relevant policy. The pre-application advice also included the main issues that should be addressed within any supporting documents, including flood risk, net biodiversity benefit and minerals safeguarding.

1.5.5 The pre-application advice acknowledged that the layout of the solar farm would allow for sheep grazing beneath the panels and between the rows of panels, providing an efficient dual use of land for renewable energy generation and retention of livestock.

1.5.6 With regard to landscape impacts, the pre-application advice from WCBC stated:

"Whilst large in terms of site area, due to the relatively small height of the proposal; the limited extent of buildings proposed; the appropriateness of the design of the solar arrays; and to their location away from boundaries, and behind established hedgerows, the proposed development could be capable of being accommodated into the local landscape without causing significant or adverse harm/impacts upon the character of the area".

"*The proposal would alter the character of the site and would impact upon its openness creating a degree of harm. The impacts that would arise should be adequately mitigated by a comprehensive landscaping scheme. In acknowledging a degree of harm that would be caused to the local landscape, this would only be temporary in nature for the 40 year life span of the solar array, and would not be*

permanent or irreversible. Furthermore, in officer's opinion the harm that would arise could be outweighed by the renewable energy benefit the scheme would deliver, which is afforded substantial weight in this assessment".

1.5.7 The submitted Environmental Statement and Design and Access Statement details how the Proposed Development would be accommodated within the landscape. The Design and Access Statement has been prepared in accordance with the requirements of Article 14[2] of The Developments of National Significance (Procedure) (Wales) Order 2016 (as amended) which is supplemented by the Design and Access Statements in Wales (July 2017) national guidance document[3].

PEDW

1.5.8 Early engagement has also been undertaken with PEDW, to ascertain a without prejudice view of the emerging development and proposed assessment. In summary:

i) A pre-application meeting was held with PEDW in August 2024. An overview of the Proposed Development was provided by the Applicant with initial discussions on potential constraints, survey work and DNS process and timetable discussed.
ii) The EIA Scoping Report was submitted to PEDW on 03 February 2025. On 03 April 2025 a formal Scoping Direction was received from PEDW. Further details of the scoping process are included in the ES Chapter 2: EIA Methodology.

1.6 Structure of the Planning Statement

1.6.1 This Planning Statement is sub-divided into five main sections following on from this introduction, which are set out below:

i) Section 2.0 provides a detailed description of the Proposed Development;
ii) Section 3.0 addresses the need for and benefits of the Proposed Development;
iii) Section 4.0 sets out the planning policy context;
iv) Section 5.0 appraises the Proposed Development against the relevant policy; and
v) Section 6.0 provides a summary and draws a concise conclusion regarding the acceptability of the Proposed Development in planning terms

[2] The Developments of National Significance (Procedure) (Wales) Order 2016
[3] Planning applications: guidance on design and access statements (DAS) | GOV.WALES

2.0 THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The Applicant is seeking planning consent for the installation and operation of a solar photovoltaic electricity generating station (or 'solar farm') comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with a 132 kV substation, grid connection cable, inter-array area cabling, Site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.

2.1.2 The solar farm would have an export capacity of up to 99.9 MW.

2.1.3 The main components of the Proposed Development are:

i) Photovoltaic solar panels and associated support frames
ii) Hybrid Inverter Container Compounds including Battery Energy Storage Systems (BESS) containers, DC-DC converters and associated hybrid inverters
iii) Onsite electrical cabling
iv) An electrical substation compound (132kV) comprising a new substation and control building
v) Spare parts storage container(s)
vi) Wooden post deer/stock fencing
vii) In-ward facing infrared CCTV cameras on 3 m poles
viii) Landscaping and ecological enhancements
ix) Electrical cabling between the solar array areas
x) Electrical cabling to the National Grid Legacy Sub-Station

2.1.4 The point of connection to the National Grid would be via the Legacy Substation located adjacent to the Talwrn Water Tower to the north of Bronwylfa Road (the B5426), approximately 2.7 km to the northwest of the main solar farm area. The solar farm would connect to the substation via an underground electrical cable. The grid connection route would be approximately 4 km from the WAA. For the majority of this route, the underground cable would sit beneath the existing highways boundary. As described previously two potential grid connection options are under consideration.

2.2 Construction

2.2.1 The timing of the construction works would be dependent upon the grant of planning permission for the Proposed Development, subsequent contract negotiations and prevailing weather and ground conditions.

2.2.2 In total, the construction works are expected to last between 39 and 52 weeks.

2.2.3 The construction programme would allow for the following key construction-related works to be undertaken:

i) Erection of tree protection fencing.
ii) Establishment of site compound.
iii) Construction of site access tracks.
iv) Erection of deer / stock fencing and gates to site perimeter.
v) Installation of solar panels and frames.
vi) Installation of solar farm electrical infrastructure such as hybrid inverter and BESS compounds.
vii) Installation of WAA substation.
viii) Installation of CCTV poles and cameras.
ix) Installation of drainage infrastructure.
x) Installation of cabling between array areas.
xi) Grid connection installation.
xii) Cultivation and seeding; and
xiii) Hedgerow and tree planting.

2.2.4 The Environmental Statement describes the construction phase activities in further detail and provides detail of the Site compounds and accesses.

2.3 The Solar Farm

2.3.1 Solar panels typically ‘over sail’ between 25% and 40% of the land which they occupy. They are typically mounted on frames arranged in series of rows approximately 4 to 10 m apart and up to a height of 3 m above ground level at the highest point. The panels are fixed and would be tilted southwards at an angle of 15-24 degrees to maximise their exposure to direct sunlight, and consequently the efficiency in terms of electricity generation. Fencing would be situated at least 5 m from any field boundaries with a further 2 m separation from panels to perimeter deer

fencing to allow for maintenance of the site/field margins. Furthermore, an offset of 8 m would be maintained to any ditches around the Site.

2.3.2 Whilst some minor excavation is required for hybrid inverter compound infrastructure and the electrical substation compound, these would occupy a minimal overall area, and no significant ground works are required for the development. Support frames for the panels would be installed using piles, driven into the ground.

2.3.3 Underground cabling would be laid throughout the Site, connecting the solar panels to the battery storage units. These cables would be laid within trenches dug to approximately 1m deep and 0.5 m in width.

2.3.4 Cables would also connect the three solar array development areas. The connection between the WAA and the CAA would be along the B5426. The connection between the CAA and the EAA would be north along Marchwiel Hall Road, east along Bwgan Ddu Lane, Cockbank Lane and Kiln Lane.

2.3.5 The electrical connections would be located within the hard surfacing of the highway or footway, or within the highways verge. The precise location of the cable will be dictated, in part, by the presence of other utilities within the highway. The trenching works would be undertaken in short sections, managed using traffic control systems or where considered necessary under road closures supported by diversions. In this regard the cable trenching works would be similar to other regular utilities works undertaken within the highway. The need for tree removals required to facilitate the electrical connections is thought to be unlikely given these cables would be located primarily within the hard surfacing area of the highway or footway.

2.3.6 The proposal would include an on-site 132 kV substation, which would comprise an open compound with support stanchions and cabling. The substation would be located within the WAA located away from the residential property to the east of the WAA and positioned to take advantage of the screening provided by the adjacent woodland. The substation's main structural elements would be painted in a muted mid-tone neutral shade to ensure that they are visually recessive within the landscape.

2.3.7 The substation would sit within a 66 m x 46 m compound comprising hardstanding and would be enclosed within a 2.4 m galvanised security palisade fencing. A 4 m high control room building would also sit within the substation compound. The

transformer and other associated electrical infrastructure would be circa 7 m in height. The substation compound would also feature a 15 m high communications mast.

2.3.8 The array areas would be enclosed by 2m wood stock post 'deer' fencing. This would sit approximately 5 m from existing hedgerows. Inward facing unlit infrared security cameras, sitting on 3 m posts would be installed around the Site for health, safety and security purposes.

2.4 Battery Energy Storage Facilities

2.4.1 The Proposed Development includes battery storage facilities within containerised battery energy storage systems (BESS). These would be situated around the Site within 'hybrid inverter container' compounds, and positioned away from residential properties and sensitive receptors. Each hybrid inverter container compound would feature 4no. battery containers measuring approximately 6 m x 2.5 m and 2.7 m tall. These containers would be equipped with modern heat ventilation and cooling (HVAC) units, and fire suppressant systems, ensuring that they operate at safe temperatures and that safety measures are in place in the unlikely event of a fire breaking out.

2.4.2 The BESS containers (and solar array) would be supported by inverters, transformers and associated infrastructure.

2.4.3 The purpose of battery energy storage would be to capture any unused or excess energy generation from the solar panels and store it, which can then be released to the grid as and when necessary. This would maximise the efficiency of the solar farm. The batteries can also store surplus electricity from the wider electricity distribution network at times of low usage and high generation elsewhere in Wales and then release it back when the grid requires. This practice is called 'grid balancing' and enables increasing deployment of renewable energy throughout the UK.

2.4.4 The BESS units would be connected to the PV system via inverters. The Site would have a grid export capacity of 99.9 MW.

2.4.5 The battery storage components would not require any significant ground works to install as they are prefabricated offsite and then brought to the Site where they are installed on concrete platforms. Some minor ground levelling would be required to ensure the components sit on stable ground.

2.4.6 The BESS units have the potential to generate heat and therefore it is necessary to adopt sufficient management and control measures. The BESS would include cooling systems which are designed to regulate temperatures. The units would also contain highly sensitive fire detection and suppression systems, enabling identification of potential thermal runaway well in advance of any occurrence, and allowing units to be switched off remotely to avoid any such incident. Currently over 1 GW of battery storage is safely operating in the UK.

2.4.7 A Battery Safety Management Plan (BSMP) would be implemented during the operation of the Proposed Development. The BSMP will detail the regulatory guidance reviewed to ensure that all safety concerns around the BESS element of the Proposed Development (including fire risk management) are addressed so far as is reasonably practicable. An Outline BSMP (oBSMP) is provided with the application.

2.5 Dual Use and Reversibility

2.5.1 The layout of the solar farm would allow for sheep grazing beneath and between the rows of panels, providing an efficient dual use of land for renewable energy generation and livestock.

2.5.2 At the end of the life of the solar farm, the equipment and shallow hardstanding surfaces would be removed from Site upon decommissioning. The underground cables in the highway, between proposed solar array areas and along the grid connection route to Legacy substation, would be left in situ. This would avoid the temporary decommissioning effects resulting from the excavation and removal of the cables installed within the highway.

2.5.3 The methods used in construction are such that remediation/decommissioning works following the removal of the solar panels, hybrid inverter container compounds and associated infrastructure would be relatively easy to achieve. As such, following decommissioning, the Site could be returned to its existing state as agricultural land.

2.6 Landscaping and Ecological Enhancement

2.6.1 Following construction, a programme of site reinstatement and habitat creation would commence, noting that ecological protection measures would be included in a Construction Environmental Management Plan (CEMP) for the construction stage. A Landscape and Ecological Management Plan (LEMP) would be developed for the

operational stage which would specify the management requirements for the lifetime of the development to ensure that the ecological mitigation measures proposed continue to deliver the benefits intended.

2.6.2 Landscape Masterplans (ES Figures 6.5a to 6.5c) submitted with the application would mitigate visual impacts of the Proposed Development and would enhance biodiversity opportunities within the Site. The Landscape Masterplans include:

i) Provision of planted buffers alongside existing landscape features, including hedgerow, trees and public rights of way and retention of existing vegetation cover (which defines character and provides visual screening), where possible.
ii) Extensive new wildflower meadow creation covering around 16 ha.
iii) Around 5km of new planting of mixed native hedgerow and tree species of local provenance to screen views of the development, and infill gaps in hedgerows, where consistent with landscape character in the Study Area and where it provides further screening.
iv) Wet woodland planting in the WAA, and new orchard creation in the CAA.
v) Diverse grassland planting in/around the panels, to be managed by low-impact sheep grazing.

3.0 THE NEED FOR THE PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 This Section of the Planning Statement identifies the need for the Proposed Development. It is divided into four principal subsections under the following headings:

i) Subsection 3.2: International Context;
ii) Subsection 3.3: UK Context;
iii) Subsection 3.4: Welsh Context; and
iv) Subsection 3.5: Local Context.

3.2 International Context

3.2.1 The UK signed an international environmental treaty to combat “dangerous human interference with the climate system” at the United Nations Conference on Environment and Development (UNCED) in 1992, along with 153 other states. It entered into force in 1994 and called for ongoing scientific research and future policy agreements designed to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner.

3.2.2 The Kyoto Protocol was signed in 1997 and was the first implementation of measures under the United Nationals Framework Convention on Climate Change (UNFCC). The Kyoto Protocol was subsequently superseded by the Paris Agreement which entered into force in 2016. The Paris Agreement is a landmark international treaty under which countries pledged to limit global warming to well below 2°C and ideally to 1.5°C.

3.3 UK Context

Clean Power Action Plan 2030 (2024)

3.3.1 The Government’s Clean Power 2030 Action Plan includes a target that Britain’s electricity demand should be met entirely by "clean" generation by 2030, with at least 95% coming from low-carbon technologies (allowing only a small residual amount from unabated gas for energy security). Achieving this essentially carbon-free power system by 2030 is integral to reaching net zero, because early decarbonisation of

electricity will enable deeper emissions cuts in other sectors (like transport and heating) through electrification.

3.3.2 The Clean Power 2030 Action Plan also emphasises the need to scale up energy storage as part of making the UK a "clean energy superpower" by 2030. It calls for a major increase in battery storage capacity – targeting around 27.1 GW of installed storage by 2030 (and 28.7 GW by 2035)[4] – which represents roughly a six-fold increase from the circa 4.5 GW of battery capacity available at the end of 2024.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

3.3.3 The Climate Change Act 2008 set a legally binding target for the UK to achieve an 80% reduction in greenhouse gas emissions by 2050, from the 1990 baseline. However, the UK Government decided that this legally binding target was not ambitious enough to mitigate the nation's activities on climate change. In 2019 the UK Government became the first major economy in the world to pass laws to end its contribution to global warming by 2050, compared to the 1990 baseline.

3.3.4 In June 2019, the Government introduced the Climate Change Act 2008 (2050 Target Amendment) Order 2019[5], revising the original Act's emissions reduction target from at least 80% to at least 100%. This amendment, commonly referred to as the net zero target, legally binds the UK to completely phase out its greenhouse gas emissions by 2050 relative to 1990 levels.

3.3.5 By the time this landmark legislation was enacted, the UK had already achieved a 42% reduction in emissions since 1990 while simultaneously growing its economy by around 72%. However, reaching the net zero target requires transformational further progress – including a massive increase in renewable energy capacity, development of carbon capture and storage technologies, expansion of nuclear energy generation, and transitioning heating and transport systems to hydrogen and electric alternatives.

3.3.6 In April 2021, in line with recommendations from the Climate Change Committee's (CCC) Sixth Carbon Budget, the UK Government announced an additional ambitious

[4] Clean Power 2030 Action Plan - GOV.UK
[5] The Climate Change Act 2008 (2050 Target Amendment) Order 2019

interim target of cutting national emissions by 78% by 2035 (compared to 1990 levels).

3.3.7 Together, the legally binding net zero 2050 commitment and the 78% by 2035 milestone make clear that a massive expansion of renewable energy projects will be essential across the UK to achieve our climate objectives.

Carbon Budgets and the Seventh Carbon Budget

3.3.8 The Climate Change Act established a system of five-year carbon budgets that cap the total UK emissions in each budget period. These carbon budgets, set 12 years in advance, serve as interim milestones on the path to net zero and are legally enforceable limits under the Act.

3.3.9 The Fourth Carbon Budget (2023–2027) was set in law in 2011, requiring a 50% reduction below 1990 levels by 2027. The Fifth and Sixth Carbon Budgets (covering 2028–2032 and 2033–2037, respectively) were adopted in 2016 and 2021. The Sixth Budget was the first one calibrated to the revised net zero 2050 target.

3.3.10 The Sixth Carbon Budget[6] provides advice on the volume of greenhouse gases that the UK can emit during the period 2033-2037. This would involve setting the most ambitious climate change target in the world of a reduction of 78% by 2035. One of the four key steps to achieving this target is the expansion of low carbon energy supplies (such as the Proposed Development), with UK electricity production achieving zero carbon emissions by 2035. This is a dramatic step change and will require more emphasis on renewable energy as part of a suite of measures to achieve this target.

3.3.11 In 2025, the Government published the proposed Seventh Carbon Budget[7] which, when enacted, will extend the UK's carbon limits into the 2040s. This upcoming budget reinforces the need for accelerated renewable electricity deployment to stay on track for the 2050 net zero goal.

3.3.12 Each carbon budget, together with the 2050 net zero target, collectively drives the need for new low-carbon energy infrastructure, as the energy sector must

[6] Sixth Carbon Budget - Climate Change Committee
[7] The Seventh Carbon Budget - Climate Change Committee

decarbonise to meet these binding limits. This in turn necessitates urgent delivery of large-scale renewable energy projects like the Proposed Development.

British Energy Security Strategy (2022)

3.3.13 The British Energy Security Strategy[8] was published in April 2022 in response to rising global energy prices, provoked by surging demand after the coronavirus pandemic as well as Russia's invasion of Ukraine. The strategy will be central to weaning Britain off fossil fuels, which are subject to volatile gas prices set by international markets. The strategy aims to boost sources of homegrown energy for greater energy security in the long term.

3.3.14 The ambitions for a significant increase in new nuclear and hydrogen production/usage are long term planks in the energy strategy, with new nuclear energy production and a significant shift to hydrogen usage for transport, heating, and other usage likely to take a number of decades to come to fruition. However, the significant increases in renewable energy generation are deliverable now and the British Energy Security Strategy sets out ambitious renewable energy targets for offshore wind and solar in the short to medium term. Specifically, the British Energy Security Strategy was the first policy document to set the Government's ambition of reaching 70 GW of installed solar capacity by 2035 — a five-fold increase from the then-installed capacity of approximately 14 GW. This ambitious target highlights the need for a significant increase in solar development if the strategy's targets are to be fulfilled.

3.4 Welsh Context

3.4.1 On 29 April 2019, the Welsh Government published a declaration[9] recognising the climate emergency in Wales. This recognised the urgent need to address global warming and its impacts on Wales and strengthened Wales' commitment to reducing carbon emissions and adapting to climate change.

3.4.2 The third UK Climate Change Risk Assessment (CCRA3) Summary for Wales[10] identifies that in the period of mid 1970s to mid-2010s, across Wales average land

[8] British Energy Security Strategy
[9] https://www.gov.wales/welsh-government-makes-climate-emergency-declaration
[10] CCRA-Evidence-Report-Wales-Summary-Final.pdf

temperature in the decade 2010-2019 was 0.9°C warmer; there has been an increase in annual mean rainfall of 2.0%; and a 6.1% increase in average sunshine hours.

3.4.3 On 9 February 2021, the Welsh Government adopted a suite of Regulations collectively referred to as the Climate Change (Wales) Regulations 2021. These Regulations include:

i) ***The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021***[11] – These regulations increase the 2050 greenhouse gas emissions reduction target from 80% to at least 100% lower than the baseline; they formally commit Wales to legally binding targets to deliver the goal of net-zero by 2050.

ii) ***The Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2021***[12] - In March 2021, section 29 of the Environment (Wales) Act 2016 was amended to set a net zero target by 2050, in line with the UK commitments in the Climate Change Act 2008. As well as amending the 2050 emissions target to net zero, the 2030 target was increased from 45% to 63% below the 1990 baseline, and the 2040 target was increased from 67% to 89% below the 1990 baseline.

iii) ***The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021***[13] - A carbon budget sets a maximum limit on the total amount of Welsh emissions permitted over a 5-year budget period. The purpose of these regulations is to set the 2nd and 3rd carbon budget at levels that represent a pathway to the new targets set for 2030, 2040 and 2050 by the aforementioned components of the Climate Change (Wales) Regulations 2021.

iv) ***The Climate Change (Net Welsh Emissions Account Credit Limit) (Wales) Regulations 2021***[14] - The Environment (Wales) Act 2016 requires Welsh Ministers to set a limit on the total amount that the Net Welsh Emissions Account can be reduced through the use of carbon units. The purpose of this regulation is to set an offset limit for the budgetary period 2021-2025 of 0% of the carbon budget. This is in line with the CCC's recommendation.

[11] The Environment (Wales) Act 2016 (Amendment of 2050 Emissions Target) Regulations 2021
[12] The Climate Change (Interim Emissions Targets) (Wales) (Amendment) Regulations 2021
[13] The Climate Change (Carbon Budgets) (Wales) (Amendment) Regulations 2021
[14] The Climate Change (Net Welsh Emissions Account Credit Limit) (Wales) Regulations 2021

Well-Being of Future Generations (Wales) Act 2015

3.4.4 The Well-being of Future Generations (Wales) Act 2015[15] is intended to improve the social, economic, environmental and cultural well-being of Wales. For Wales to be sustainable these four aspects of well-being must be improved. The Well-being of Future Generations (Wales) Act identifies seven well-being goals and details the ways in which specified public bodies must work to improve the well-being of Wales. The well-being goals include working to address climate change and increase resilience to the impacts of climate change.

3.4.5 It also places a well-being duty that public bodies will be expected to carry out. The well-being duty states: '*Each public body must carry out sustainable development*'. The Act puts in place a '*sustainable development principle*' which tells organisations how to go about meeting their duty under the Act.

Prosperity for All: A Low Carbon Wales (2019)

3.4.6 The Prosperity for All: A Low Carbon Wales[16] report sets foundations for Wales to transition to a low carbon nation and sets out the action required to cut emissions and support the growth of a low carbon economy. Policy 31 – Delivery of our Renewable Energy Targets aims to accelerate the deployment of renewable generation by "*supporting the development of energy planning at the local and regional level*".

Building Better Places (2020)

3.4.7 Following the Welsh Government's declaration of a climate emergency in 2020, the Building Better Places[17] report recognises the Welsh Government's legal obligations under the Environment and Well-being of Future Generations Act in stating that "*our actions must not be diluted*" in order to tackle climate change, reduce the nation's carbon footprint and improve biodiversity and ecological resilience for the future. As set out in Planning Policy Wales, the report sets out the 'National Sustainable

[15] *Well-being of Future Generations (Wales) Act 2015*
[16] *https://www.gov.wales/sites/default/files/publications/2019-11/prosperity-for-all-a-climate-conscious-wales_0.pdf*
[17] *Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery*

Placemaking Outcomes', one of which is for Wales to generates its own renewable energy, in order to grow the economy in a sustainable manner.

Future Wales: the National Plan 2040 (2021)

3.4.8 Future Wales – the National Plan 2040[18] is the national development framework which sets the direction for development in Wales to 2040. The Plan outlines a strategy for addressing key national priorities through the planning system, including achieving de-carbonisation and climate resilience. It is guided by the Well-being of Future Generations (Wales) Act 2015, which demands that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales, under the wider commitment to delivering sustainable development.

3.4.9 The Plan identifies renewable energy as a key opportunity, and states that Wales can become a world leader in renewable energy technologies, specifically recognising Wales's potential to deliver solar energy generation.

3.4.10 The Plan reflects the targets established by the Welsh Government in 2017 for the generation of renewable energy, requiring:

i) 70% of electricity consumption to be generated from renewable energy by 2030.
ii) One gigawatt of renewable energy capacity to be locally owned by 2030.
For new renewable energy projects to have at least an element of local ownership from 2020.

Wales Infrastructure Investment Strategy (December 2021)

3.4.0 The Infrastructure Investment Strategy[19] sets out how the Welsh government will tackle climate change through investment in infrastructure. It confirms the need to promote environmental, social, economic and cultural well-being through infrastructure investments.

3.4.1 Decarbonisation and greenhouse gas reduction is sighted as one of the key elements of promoting environmental well-being. The strategy highlights the importance of promoting renewable energy technologies to deliver a zero-carbon energy system in

[18] Update to Future Wales - The National Plan 2040
[19] https://www.gov.wales/wales-infrastructure-investment-plan-and-strategy

meeting decarbonisation and emission reduction targets. Reducing unsustainable consumption of natural resource is also cited as an important target, which promotes a circular economy which reduces and makes the best use of waste.

3.5 Local Context

3.5.1 Government data[20] for electricity use within Wrexham County Borough Council administrative area shows that in 2021 (latest available data), Wrexham used a total of 204 GWh of electricity, based on sales of electricity made to domestic customers.

3.5.2 The 2021 Census estimated that there are around 57,900 households in Wrexham. The electricity generated by the Proposed Development would be enough to meet the needs of over 34,775 typical Welsh homes and result in an approximate saving of over 2.3 million tonnes of CO_2, compared with generation from fossil fuels. The Proposed Development would make a significant contribution to meeting the demand for electricity within Wrexham. Given the scarcity of available grid capacity in the area, and across Wales more generally, by virtue of having a secured grid connection offer, the project offers a viable opportunity to deliver a significant quantity of clean, renewable energy to the grid.

3.5.3 Following the Welsh Government's climate emergency declaration in April 2019, Wrexham County Borough Council declared a Climate and Ecological Emergency in September 2019[21]. In response to this declaration, WCBC developed a Decarbonisation Plan seeking collaboration with partners and communities to develop and decarbonise the environment, and pursue the Council's net-zero ambitions.

3.5.4 When preparing the Local Development Plan, to provide an evidence base to plan positively and strategically for renewable energy and low carbon development, WCBC prepared a renewable energy assessment (REA)[22]. The REA identified that the greatest potential for delivering renewable energy in the County Borough was solar power.

[20] *Table | Domestic energy consumption | Environment | Environment and sustainability | Data | Home - InfoBaseCymru*
[21] *Climate Change and Ecological Emergency – Annual Report on Our Decarbonisation Plan*
[22] *EBRE02 Renewable Energy Assessment Updated September (2019).pdf*

3.5.5 One of the purposes of the REA was to provide the evidence to define local search areas for solar resources, which then allowed the identification of allocations on the proposals maps linked to relevant LDP policies. A structured review was undertaken in the document, which then sets out the area of least constraint that then fed into the site allocation process. The Proposed Development falls partially within areas identified as being least constrained for solar resources.

3.5.6 Within the supporting paragraphs to Policy RE2 of the Wrexham Local Development Plan 2013-2028, WCBC's desire to contribute to lowering UK carbon emissions through the delivery of renewable energy generation is made clear:

"there is significant potential within the whole of the County Borough for the development of renewable and low carbon technologies and developers are encouraged to explore all aspects of the County Borough's capability to contribute to lowering UK carbon emissions within the energy sector".

3.5.7 In 2020 the North Wales Energy Strategy[23] was published by the North Wales Economic Ambition Board (NWEAB). This strategy seeks to provide a strategic direction for the future of a decarbonised energy system in North Wales, including Wrexham. The strategy supports the continued deployment of land-based renewables such as solar PV, onshore wind, hydro-electric, and hydrogen. It also sets goals for increased generation of energy from these sources, noting the economic benefits of doing so for the region.

3.5.8 In light of the above, there is a clear need for renewable energy development in Wrexham in order for Wrexham County Borough Council to achieve its ambitions in relation to the climate emergency, energy security and local decarbonisation.

3.6 Site Selection Rationale

3.6.1 Identifying appropriate locations for a solar scheme has two principal criteria relating to the National Grid, both of which must be met. Firstly, and most importantly, any solar scheme must be located proximate to an existing substation which has the available capacity to enable the import of power generated into the electricity grid,

[23] North Wales Energy Strategy

either directly into the substation or the nearby transmission network. This is becoming increasingly rare, with available grid capacity a scare resource in Wales.

3.6.2 Secondly, solar schemes must be located close enough to the identified substation such that they do not become unviable, either due to the length of cable required to be deployed, or due to the potential transmission losses that occur through the transfer of power across long connections.

3.7 Land Use

3.7.1 Solar schemes are often derided for their land use compared to other forms of generation. This argument promotes the sentiment that the Welsh Government must either prioritise food production or solar energy. This is a common misnomer given of the UK's land cover (242,495km2) around 56% of it is agricultural land (137,000km2), and to meet the UK's renewable energy targets, just 700km2 of this would need to be used for solar, according to Corine Land Cover Data24 and an analysis by Carbon Brief25. This represents just 0.3% of the UK's land surface area, or just 0.5% of the UK's agricultural land surface area, less than the amount used for golf courses and a fraction of the land used for biofuel production.

3.8 Conclusions

3.8.1 There is no Government policy that requires, as a matter of general principle, applicants to demonstrate that there is a need for their renewable energy development. However, it is widely recognised that the need for a particular scheme may be a material planning considering to be weighed in the planning balance against possible policy tension.

3.8.2 It is explicit from the above considerations that at a national and local level, there is significant legislative and policy support for renewable energy development. Furthermore, there is a clear expectation that solar power will provide a significant

24 Rae, Alasdair (2017). A Land Cover Atlas of the United Kingdom (Document). The University of Sheffield. Journal contribution. https://doi.org/10.15131/shef.data.5266495.v1

25 Carbon Brief: Is Solar Power a threat to UK Farmland? https://www.carbonbrief.org/factcheck-is-solar-power-a-threat-to-uk-farmland/

contribution to Wales' achievement of the 2050 net zero emissions target and the interim emissions targets.

3.8.3 To decarbonise the electricity system by 2035 and achieve the net zero target by 2050, action is required now to deliver the projects necessary for these mid and long-term goals. Whilst 2050 is less than 30 years away, the National Grid forecast that significant solar PV development will be required to remain on the correct trajectory for achieving net zero by 2050. The Proposed Development would make a notable contribution to decarbonising the power sector and achieving the anticipated requirements for solar PV in advance of 2050. It would also assist WCBC with its ambition to contribute to lowering UK carbon emissions through the delivery of renewable energy generation. This should be given significant weight in the decision-making process.

4.0 PLANNING POLICY CONTEXT

4.1 Introduction

4.1.1 This Section of the Planning Statement identifies the relevant planning policy context for the Proposed Development and considers the statutory development plan for the Site and relevant national and local planning guidance.

4.1.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that planning applications should be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. Section 38(4) of the PCPA Act in Wales currently comprises the following Development Plan documents:

i) National Development Plan (NDP)
ii) Strategic Development Plan (SDP) for any strategic planning area that includes all or part of that area; and
iii) The Local Development Plan (LDP)

4.1.3 These Development Plan documents are discussed in context of the Proposed Development in the subsequent sections.

4.2 National Development Plan

Future Wales – the National Plan 2040

4.2.1 Future Wales – the National Plan 2040[26] is a national development framework which sets the direction for development in Wales to 2040. The Plan outlines a strategy for addressing key national priorities through the planning system, including achieving de-carbonisation and climate resilience. It is guided by the Well-being of Future Generations (Wales) Act 2015[27], which demands that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales, under the wider commitment to delivering sustainable development.

4.2.2 The Plan identifies renewable energy as a key opportunity, and states that Wales can become a world leader in renewable energy technologies. It further highlights

[26] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf
[27] Well-being of Future Generations (Wales) Act 2015 – The Future Generations Commissioner for Wales

Wales' potential for solar generation and their commitment to ensuring the planning system provides a strong lead for renewable energy development and being well placed to reduce carbon emissions. The spatial strategy consists of several policies which guide strategic and spatial choices. It highlights that the Welsh Government has placed a strong focus on renewable and low carbon energy schemes, as it is anticipated that these will be the most common schemes coming forward.

4.2.3 Page 96 of Future Wales – the National Plan 2040 states that "*applications for Developments of National Significance must be determined in accordance with Future Wales*".

4.2.4 **Policy 1 - Where Wales will grow** aims to support growth across Wales and particularly in the National Growth Areas, with Wrexham and Deeside being one of those areas. In the NGAs there *"will be growth in employment and housing opportunities and investment in infrastructure"*.

4.2.5 **Policy 4 – Supporting Rural Communities** sets out that "*the Welsh Government supports sustainable and vibrant rural communities. Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulations should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges"*.

4.2.6 **Policy 9 – Resilient Ecological Networks and Green Infrastructure** aims "*to ensure that enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure*". The policy continues to set out that the Welsh Government will work with key partners to identify areas which should be safeguarded and identify opportunities where existing and potential green infrastructure could be maximised, requiring the use of nature-based solutions as a key mechanism for sustainable growth. The policy highlights that action towards securing the maintenance and enhancement of biodiversity to provide a net benefit must be demonstrated as part of development proposals.

4.2.7 **Policies 17 and 18** outline strategic spatial and detailed criteria-based policies respectively and should be considered together in the determination of applications. As highlighted by the Plan, Policy 17 recognises the "*wealth of current and emerging renewable energy technologies that can contribute towards energy and*

decarbonisation targets". It further states that Policy 18 "*provides a decision-making framework for renewable and low carbon energy technologies".* A more detailed summary of both policies is provided below.

4.2.8 **Policy 17 – 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*."

4.2.9 The policy emphasises the importance of where large-scale wind and solar schemes should be located. It states that solar developments will not be permitted in National Parks and Areas of Outstanding Natural Beauty, and that proposals should demonstrate that they will not have an unacceptable adverse impact on the environment. Proposals should also describe the benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities.

4.2.10 **Policy 18 – Renewable and Low Carbon Energy Developments of National Significance** states that low carbon and renewable energy projects will be permitted where it can be demonstrated that:

i) "outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty);

ii) there are no unacceptable adverse visual impacts on nearby communities and individual dwellings;

iii) there are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured)

iv) there are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;

v) the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity;

vi) there are no unacceptable adverse impacts on statutorily protected built heritage assets;

vii) there are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance;

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

ix) there are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation;

x) the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources;

xi) there are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.

xii) The cumulative impacts of existing and consented renewable energy schemes should also be considered".

4.2.11 **Policy 20 – National Growth Area – Wrexham and Deeside** states that Wrexham and Deeside will be the *"main focus for growth and investment in the North region"*. The policy emphasises that strategic decisions on the location of key infrastructure should support existing settlements.

4.2.12 **Policy 21 – Regional Growth Area – North Wales Coastal Settlements** is also of relevance as it provides the broader framework for the North Wales region. Its focus is on regionally important towns on northern Coast and their subregional role that will complement the National Growth area.

4.2.13 The policy also emphasises that it is vital for the region to play a key role in decarbonisation and supports the realisation of renewable energy, further stating that there is a strong potential for wind, marine and solar energy generation which should be supported by Strategic and Local Development Plans. The Welsh Government

priority for *"energy generation, storage and management"* to play a role in supporting the regional economy in the North is also emphasised.

4.3 Strategic Development Plan

4.3.1 At the time of writing, Strategic Development Plans (SDPs) have not yet been prepared in any region, but are required to be in conformity with Future Wales. For North Wales specifically, the work on an SDP is at an early stage, with no SDP expected to be adopted until 2030 at the earliest[28].

4.4 Local Development Plan

4.4.1 The Wrexham Local Development Plan (2013 – 2028) (LDP) was initially adopted by Full Council on the 20 December 2023 and consequently formed part of the Development Plan for the Authority Area. However, the status of the plan has been subject to legal review which has fundamentally altered its status.

4.4.2 The LDP proposed 3,100 new homes and consequently was initially rejected by the Council Members in April and June 2003. This resulted in a Judicial Review brought by a consortium of housing developers which concluded with a High Court Judge ruling that the Council were compelled (i.e. *must*) adopt the plan, and failure to do so would leave the Council and its members potentially liable to consequential costs. The LDP was consequently adopted on the basis of that Judgement. Subsequently a further challenge was made against the decision of the High Court.

4.4.3 The challenge was heard at the Court of Appeal, which, on the 20 December 2024, ruled in favour of the claimant, effectively stating that the Planning and Compulsory Purchase Act 2004 as relevant legislation, did not place mandatory duty on WCBC to adopt the LDP, and that Councillors can exercise their discretion in deciding whether to do so.

4.4.4 Following a challenge brought under section 113 of the 2004 Act, the High Court issued an Order received on 12 June 2025. The effect of the Order is that the vote by Full Council on the 20 December 2023 to adopt the LDP is quashed, returning the LDP back to the status of an unadopted plan. Whilst the LDP has not been formally withdrawn, and the result of the High Court decision does not affect the conclusions

[28] Agenda for North Wales Corporate Joint Committee on Friday, 17th January, 2025, 1.30 pm

of the Examination Inspectors that the LDP is 'sound', it no longer has the status of a development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

4.4.5 The quashing of the LDP means that the Wrexham Unitary Development Plan (1999 – 2011) (UDP), is returned to the status of 'adopted development plan'. For the reasons set out above, the LDP can still be given significant weight in the determination of applications for planning permission, where the policies of relevance more accurately reflect the prevailing national policy. For that reason, the plan is considered as a material planning consideration at section 4.5 of this statement.

4.4.6 As referred to in the Environmental Statement, as acknowledged in the Planning Committee Report for the committee held 7th July 2025[29] there are differences in the boundaries and designations contained within the UDP and LDP. The assessments completed to inform this application were prepared when the LDP was the adopted plan and consequently they consider the local designations conveyed by the LDP. Paragraphs 2.14-2.17 of the aforementioned Planning Committee Report state how instances of conflict between the LDP and UDP will be managed by WCBC Officers, and this approach has been applied to the technical assessments and ES accompanying the application.

WCBC Unitary Development Plan 1996-2011

4.4.7 As set out above, the status of the UDP has in the last year reverted from a plan having been replaced by the LDP, back to comprising a key component part of the Development Plan. The UDP was adopted in 2005 and comprises two parts – a Strategy that outlines the broad intentions for development in the area; and Specific Policies accompanied by reasoned justifications. Those policies that are considered of most relevance to the determination of the Proposed Development, are considered to comprise:

i) UDP Policy PS2: Strategic Policy (The Broad Location of Development)
ii) UDP Policy PS3: Strategic Policy (The Broad Location of Development)
iii) UDP Policy PS11: Biodiversity

[29] (Public Pack)Agenda Document for Planning Committee, 07/07/2025 16:00

iv) UDP Policy PS12: Renewable Energy
v) UDP Policy GDP1: Development Objectives
vi) UDP Policy EC2: Agricultural Land
vii) UDP Policy EC4: Hedgerows, Trees and Woodland
viii) UDP Policy EC5: Special Landscape Areas
ix) UDP Policy EC12: Development and Flood Risk

4.4.8 **Policies PS2 and PS3: Broad Location of Development** are strategic policies which aim to direct development to within settlement limits and employment areas where the existing transport network can be utilised. The policies also seek to ensure that the countryside, landscape character, open space, or the quality of the natural environment are not detrimentally affected by development.

4.4.9 **Policy PS11: Biodiversity** states that encouragement will be given to proposals which improve the biodiversity value of sites.

4.4.10 **Policy PS12: Renewable Energy** states that proposals for the generation of renewable energy will be supported provided that the wider environmental benefits are not outweighed by any detrimental impacts on the landscape, public safety, and the local environment.

4.4.11 **Policy GDP1: Development Objectives** sets out eleven objectives for all developments to adhere to. The following objectives are considered to be particularly relevant to the Proposed Development:

a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.

b) Take account of personal and community safety and security in the design and layout of development and public / private spaces.

c) Make the best use of design techniques, siting and orientation to conserve energy and water resources.

d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.

h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.

k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

4.4.12 **Policy EC2: Agricultural Land** states that development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land.

4.4.13 **Policy EC4: Hedgerows, Trees and Woodland** requires that development proposals should provide for the conservation and management of (inter alia) hedgerows, trees, and woodland. New planting should be included to enhance the character of the landscape and townscape, whilst developments which result in the loss or significant damage to valuable trees, important hedgerows or woodland will not be permitted.

4.4.14 **Policy EC5: Special Landscape Areas** states that within Special Landscape Areas, "*priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other rural enterprises, and essential operational development by utility service providers, will be strictly controlled. Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints*."

4.4.15 **Policy EC12: Development and Flood Risk** seeks to prevent development that would be on land where there is an unacceptable risk of flooding or which could exacerbate existing or create new flooding problems elsewhere.

4.5 Material Planning Considerations

4.5.1 There is no strict definition of what constitutes a 'material consideration' in planning legislation, although case law indicates that any consideration, which relates to the use or development of land is capable of being a material consideration in the determination of a planning application. Information contained within national policy and guidance, as well as other policy, guidance and emerging documents can represent material planning considerations in the determination of a planning application.

4.5.2 For the purposes of the Proposed Development, the policy derived material considerations identified by the Applicant are set out below.

UK

i) Overarching National Policy Statement for Energy (EN-1) (2024)[30]; and
ii) National Policy Statement for Renewable Energy Infrastructure (EN-3) (2024)[31]

National (Wales)

i) Planning Policy Wales (Edition 12)[32];
ii) Technical Advice Note series[33];
iii) Planning Implications of Renewable and Low Carbon Energy Development: Practice Guidance (2011)[34];
iv) Energy Policies in Local Development Plans Letter (2015)[35];
v) Assessment of On-shore Wind and Solar Energy Potential in Wales (2019)[36];
vi) Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (2015)[37];
vii) Building Better Places (2020)[38]; and,
viii) Designing for Renewable Energy in Wales (2023)[39].

Local

i) Wrexham Local Development Plan (2013 – 2028) (LDP)
ii) Wrexham County Borough Council Local Planning Guidance Notes (LPGNs)[40]; and
iii) Wrexham Renewable Energy Assessment (2019)[41].

[30] EN-1 Overarching National Policy Statement for Energy
[31] National Policy Statement for renewable energy infrastructure (EN-3)
[32] Planning Policy Wales - Edition 12
[33] Technical advice notes | GOV.WALES
[34] Planning implications of renewable and low carbon energy development: practice guidance | GOV.WALES
[35] Energy policies in local development plans | GOV.WALES
[36] Assessment of on-shore wind and solar energy potential in Wales | GOV.WALES
[37] Local development plans: guidance on renewable and low carbon energy | GOV.WALES
[38] Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery
[39] Designing for Renewable Energy in Wales
[40] Local planning guidance notes | Wrexham County Borough Council
[41] Wrexham County Borough Council - Evidence Base & Supporting Documents

National Policy Statements

4.5.3 National Policy Statements (NPSs) are produced by the UK Government. They set out the government's objectives for the development of nationally significant infrastructure. They describe policies relevant to the various types of nationally significant infrastructure projects and explain how these policies take account of government policy relating to the mitigation of, and adaptation to, climate change.

4.5.4 Whilst specific to Nationally Significant Infrastructure Project applications, the NPSs state that they are likely to be a material consideration in decision making on related planning applications that fall under the Town and County Planning Act 1990. This application is submitted under Section 62D of the Town and Country Planning Act 1990 and therefore the NPSs may be a material consideration in the determination of this application.

4.5.5 The Department for Energy Security and Net Zero published draft updates to EN-1, EN-3 and EN-5 on the 24th of April 2025. One of the most substantial changes relates to the integration of the Clean Power 2030 Action Plan into the NPSs. In this regard, the draft update highlights the essential role that renewable energy NSIPs have in achieving the target of producing at least 95% of Great Britain's generation from clean sources of power by 2030. In relation to solar energy the draft updates do not contain any material changes which affect the approach to the environmental assessments presented in the Environmental Statement.

Overarching National Policy Statement for Energy (EN-1) (2024)

4.5.6 The Overarching National Policy Statement for Energy (EN-1) was revised in January 2024.

4.5.7 The NPS makes the following statements:

"To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact

Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050" (Paragraph 3.3.3).

"*New generating plants can deliver a low carbon and reliable system, but we need the increased flexibility provided by new storage and interconnectors (as well as demand side response, discussed below) to reduce costs in support of an affordable supply*." (Paragraph 3.3.5).

"*Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*." (Paragraph 3.3.20).

"*Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.*" (Paragraph 3.3.25).

"*For projects which qualify as CNP infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases'. Exceptional cases include unacceptable risk to public health and safety, defence, irreplaceable habitats.*" (Paragraph 4.1.7).

National Policy Statement for Renewable Energy Infrastructure (EN-3) (2024)

4.5.8 The National Policy Statement for Renewable Energy Infrastructure (EN-3) was also revised in January 2024 and sets out the national policy for renewable energy projects in England and Wales. EN-3 sets out the importance of renewable energy in achieving the UK Government's ambitious targets for renewable energy generation and highlights that a *"There is an urgent need for new electricity generating capacity to meet our energy objectives."* (Paragraph 1.1.1).

4.5.9 As part of the January 2024 revision, the Government has reiterated the important role that solar developments will play in developing a low carbon economy and meeting government's net zero targets. EN-3 states:

"*The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a*

key part of the government's strategy for low-cost decarbonisation of the energy sector".

"*Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation worldwide. Solar farms can be built quickly and coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free and at little to no extra cost to the consumer*." (Paragraph 2.10.13)

Planning Policy Wales – Edition 12 (2024)

4.5.10 Planning Policy Wales[42] (PPW) was revised in 2024 to Edition 12 to reflect the essential role of the planning system in meeting the challenges laid down by the Global Biodiversity Framework agreed at COP15 and continuing to fulfil the Section 6 duty to maintain and enhance biodiversity and the resilience of ecosystems in Wales. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

4.5.11 Section 5.4 focuses on economic development, setting out the Welsh government definition of this[43] for planning purposes, and stating that *"the planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses"*. Paragraph 5.4.2 states that economic land uses not only include the *"traditional employment land uses"* it also includes energy land uses amongst others.

4.5.12 Section 5.6 focuses on the rural economy, and highlights the need to develop a wide base if it is to be adaptable and resilient to the challenges it faces now and the future, such as the climate emergency, the coronavirus pandemic and exiting the European Union, all of which bring uncertainty. Paragraph 5.6.13 advises that diversification of rural areas can include renewable energy proposals, such as solar installations. It

[42] Planning Policy Wales - Edition 11 (gov.wales)
[43] 5.4.1 – *"For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes"*

further advises that these schemes should be supported where there is no detrimental impact on the environment and local amenity.

4.5.13 Section 5.7 discusses energy and highlights the Welsh Government's commitment to renewable energy, stating that their highest priority is to reduce demand wherever possible and affordable, and that low carbon electricity must become the main source of energy in Wales. This is reflected in the position of renewable energy generation in the energy hierarchy for planning (Figure 10 of PPW).

4.5.14 Section 5.9 focuses on renewable and low carbon energy and paragraph 5.9.15 states that *"outside identified areas, planning applications for renewable and low carbon energy developments should be determined based on the merits of the individual proposal".* This is furthered in paragraph 5.9.19, which sets out the way in which the local planning authority should approach renewable energy proposals. It states that:

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

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

4.5.15 In addition to the above, Paragraph 5.9.21 advises that *"developers for renewable and low carbon energy developments should, wherever possible, consider how to avoid, or otherwise minimise, adverse impacts through careful consideration of location, scale, design and other measures".*

Technical Advice Notes

4.5.16 Technical Advice Notes (TANs) provide local authorities with detailed planning advice which are taken into account when preparing development plans, and can be material to decisions on developments made by Local Planning Authorities, the Senedd, and Planning and Environment Decisions Wales. The relevant TANs to the Proposed Development are discussed in more detail below.

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

4.5.17 TAN 5[44] provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

Technical Advice Note 6: Planning for Sustainable Rural Communities (TAN 6) (2010)

4.5.18 TAN 6[45] states that the planning system has a key role to play in supporting the delivery of sustainable rural communities. It states that whilst it should ensure that sufficient land should be made available to provide homes and employment opportunities, the planning system must also respond to the challenges posed by climate change, for examples by accommodating the need for renewable energy generation.

Technical Advice Note 11: Noise (TAN 11) (1997)

4.5.19 TAN 11[46] advises that the planning system should be used to minimise adverse impact of noise without placing unreasonable restrictions on development.

Technical Advice Note 12: Design (TAN 12) (2016)

4.5.20 TAN 12[47] provides guidance on how design can contribute to the quality of Wales' varied landscape and can contribute to sustaining a positive image for Wales. It states that new development should harness intrinsic resources of the area for more environmentally sustainable development and in particular, measures to help reduce effects related to climate change and to build in resilience to mitigation and adaptation.

Technical Advice Note 15: Development and Flood Risk (TAN 15) (2025)

4.5.21 TAN 15[48] seeks to guide new development away from areas of high flood risk and categorises renewable energy generation facilities as 'less vulnerable development' in the context of the Proposed Development. TAN 15 provides technical guidance

[44] https://www.gov.wales/technical-advice-note-tan-5-nature-conservation-and-planning
[45] https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities
[46] https://www.gov.wales/technical-advice-note-tan-11-noise
[47] https://www.gov.wales/technical-advice-note-tan-12-design
[48] Technical Advice Note 15: Development, flooding and coastal erosion

which supplements the policies set out in PPW and Future Wales in relation to flooding and coastal erosion.

Technical Advice Note 23: Economic Development (TAN 23) (2014)

4.5.22 TAN 23[49] advises that in determining planning applications local planning authorities need to bear in mind that traditional business uses only account for part of the activity in the economy and categorises renewable energy generation as a type of economic land use. It further states that it is important that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

Technical Advice Note 24: The Historic Environment (TAN 24) (2004)

4.5.23 TAN 24[50] provides guidance on how the planning system considers the historic environment during decision making on planning applications. It states that the multiple impacts of climate change on historic assets are a particular challenge and that some of these will be outside the planning process such as sea-level rise, flooding, changes in vegetation and agricultural land use.

4.5.24 The note emphasizes measures that need to be taken in response to the impact of climate change, such as the installation of renewable energy projects, and states these will need to be weighed against any harm to the significance of historic assets.

Planning Implications of Renewable and Low Carbon Energy Development: Practice Guidance (2011)

4.5.25 Planning Implications of Renewable and Low Carbon Energy Development: Practice Guidance[51] was published in 2011 and forms part of the Welsh Government's energy planning guidance. It provides a summary of the design, potential impacts, mitigation and enhancement measures of solar array installation, including:

i) Landscape and visual;
ii) Glint and glare;
iii) Ecology;
iv) Historic environment;

[49] https://www.gov.wales/technical-advice-note-tan-23-economic-development
[50] https://www.gov.wales/technical-advice-note-tan-24-historic-environment
[51] https://www.gov.wales/planning-implications-renewable-and-low-carbon-energy-development-practice-guidance

v) Agriculture;
vi) Hydrology and flood risk; and
vii) Cumulative impacts.

Energy Policies in Local Development Plans Letter (2015)

4.5.26 Energy Policies in Local Development Plans[52] is a letter sent to the Chief Planning Officer (CPO) which encourages local authorities to include designated areas for renewable energy schemes in their local development plans. It emphasises that it is imperative that the planning system identifies and protects areas with renewable energy generation potential for the long term.

Assessment of On-shore Wind and Solar Energy Potential in Wales (2019)

4.5.27 An objective of the Assessment of On-shore Wind and Solar Energy Potential in Wales[53] was to identify the most appropriate locations for onshore wind and solar energy development in Wales (including for DNS).

4.5.28 The Assessment identifies, at Figure 4, that the Application Site is situated within areas of 'greatest opportunity' and 'varying opportunity' for solar across the Welsh regions.

Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (2015)

4.5.29 Planning for Renewable and Low Carbon Energy – A Toolkit for Planners[54] provides comprehensive guidance to local authorities in planning for the development required to meet emission and energy targets. The Toolkit was commissioned by the Welsh Government to support the preparation of a robust evidence base to inform Local Plan spatial policies that facilitates the deployment of low carbon and renewable energy systems.

4.5.30 The Toolkit recognises solar energy as a key technology in meeting the UK renewable energy targets. It notes that in 2012, 84% of all new renewable installations across Wales were solar PV. It also acknowledges that there is currently no standard agreed approach to constraints mapping for solar farms, and provides

[52] https://www.gov.wales/energy-policies-local-development-plans
[53] https://www.gov.wales/assessment-shore-wind-and-solar-energy-potential-wales
[54] https://www.gov.wales/local-development-plans-guidance-renewable-and-low-carbon-energy

a potential approach on how to identify areas suitable areas for solar farm projects. It recommends that the following are included as key considerations when assessing areas for solar photovoltaic potential:

i) Built up areas and infrastructure;
ii) Environmental and heritage constraints;
iii) Suitable slope and topology;
iv) Addressing cumulative impact;
v) Assess potential installed capacity and energy output; and
vi) Agricultural Land Classification.

Building Better Places (2020)

4.5.31 Following the Welsh Government's declaration of a climate emergency in 2020, the Building Better Places[55] report recognises the legal obligations under the Environment and Well-being of Future Generations Act in stating that "*our actions must not be diluted*" in order to tackle climate change, reduce our carbon footprint and improve biodiversity and ecological resilience for the future.

4.5.32 As set out in the PPW, the report sets out the National Sustainable Placemaking Outcomes, one of which is for Wales to generates its own renewable energy in order to grow the economy in a sustainable manner[56].

Designing for Renewable Energy in Wales (2023)

4.5.33 The Design Commission for Wales published this guidance document in 2023[57] that sets out key design objectives and considerations for large-scale on-shore wind and solar installations. This builds upon Policy set out in Future Wales 2040 and Planning Policy Wales and provides guidance on design matters for decision makers and developers.

4.5.34 It sets out the context for development of renewable energy in Wales and highlights that of the renewable energy sources available that wind and solar generation are *"the most advanced in terms of readiness and capacity for scale"*. In this context

[55] *Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery (gov.wales)*
[56] *This outcome remains in PPW Edition 12 in Figure 5: National Sustainable Placemaking Outcomes*
[57] *https://www.gov.wales/sites/default/files/publications/2023-12/designing-for-renewable-energy-in-wales.pdf*

guidance is set on the design process that can support good planning for such schemes, providing both general guidance and more specific guidance for each technology.

Wrexham Local Development Plan (2013 – 2028) (LDP)

4.5.35 The LDP was 'tested' under examination between 2019 and 2022. The examining inspector concluded that the plan was 'sound', and consequently the LDP was adopted on 20 December 2023. As set out above, the process through which the plan was adopted was subsequently subject to successful legal challenge, and the consequence was that the adoption was quashed, and the LDP no longer forms part of the Development Plan. For the reasons set out above, the plan can still be given significant weight in the determination of applications for planning permission, where the policies of relevance more accurately reflect the prevailing national policy. For that reason, the plan is considered further below.

4.5.36 The principal aim of the LDP is to contribute to sustainable development. It sought to do this through a series of policies that collectively aim to deliver and meet the Key Issues, Vision and Objectives. The Vision is that by 2028, Wrexham will be an attractive, distinctive and accessible place where people will want to live, work, visit and invest.

4.5.37 The LDP, comprises the following documents relevant to the Proposed Development:

i) Wrexham Local Development Plan 2013-2028[58] (adopted December 2023);
ii) Wrexham Local Development Plan 2013-2028 Proposal Maps 1-29[59]; and
iii) Wrexham Local Development Plan 2013-2028 Constraints Maps 1-29[60]

4.5.38 The documents of the Local Development Plan and the relevant polices are set out in the following sections.

[58] https://wrexham-consult.objective.co.uk/file/6265559
[59] Wrexham County Borough Council - Adopted Wrexham Local Development Plan
[60] Wrexham County Borough Council - Adopted Wrexham Local Development Plan

Wrexham Local Development Plan 2013-2028

4.5.39 The Wrexham LDP has been reviewed and the following policies have been identified as the most relevant in context of the Proposed Development.

Policy SP2: Location of Development

4.5.40 This policy directs the majority of new development *"to the defined settlement limits and employment areas as identified on the Proposals Map"*. This is linked to the LDP's growth strategy and settlement hierarchy. Outside of the settlement limits and employment areas land is classed as *"open countryside"* where development *"will be strictly controlled"*.

Policy SP6: Green Wedge

4.5.41 Thirteen Green Wedges are designated under this policy (and shown on the proposals maps), which are designated to protect the openness of land between settlements and to prevent coalescence. The Rhostyllen and Johnstown Green Wedge is the only designation of relevance to the Proposed Development and is located to the north of the Site, north of Johnstown.

Policy SP11: Transport and Accessibility

4.5.42 Policy SP11 sets out general development principles and requirements in relation to transport and accessibility. Criteria relevant to the Proposed Development have been set out below:

"i. Restricting development that would have an unacceptable impact on the safe and efficient operation of the transport network…

vi. Ensure adequate levels of car parking taking into consideration the location and accessibility of new developments to existing public transport facilities and walking and cycling network;

Policy SP12: Design Principles & Masterplanning Framework

4.5.43 This policy sets a strategic requirement for all development to *"be of a high quality, sustainable design which makes a positive contribution to the creation of locally distinctive places"* and demonstrate that account has been taken of local

characteristics and how design solutions will enhance the quality of the natural and built environment.

Policy SP14: Natural Environment

4.5.44 SP14 sets a requirement to only permit development that seeks to *"protect, conserve and enhance the natural environment"* with several features listed, of which the following are the most relevant:

"● Special Areas of Conservation, Special Protection Areas, and Ramsar Sites;

● Sites of Special Scientific Interest and National Nature Reserves;

● Protected Species and their habitat;

● Local Wildlife Sites;

● Special landscape areas;

● Natural landscape features and Green Infrastructure such as trees, hedges and woodland which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change;

● The quality of natural services including water, soundscape, air and soils; and

● Habitats and species of principal importance to Wales;"

Policy SP15: Historic and Cultural Environment

4.5.45 This policy states that development will only be supported where it conserves, protects, preserves, or enhances the designated and undesignated cultural and historic assets listed in the policy.

Policy SP16: Minerals Supply and Safeguarding

4.5.46 This strategic policy establishes the framework for sustainably managing the Plan Areas mineral resource through protection of minerals form unnecessary sterilisation, establishing buffer zones for mineral workings, and allowing for new mineral extraction in an appropriate manner.

Policy SP18: Climate Change

4.5.47 SP18 sets out requirements for development proposal to demonstrate that the following have been taken into account as part of mitigating against and adapting to climate change:

"i. Reducing carbon emissions;

ii. Protecting and increasing carbon sinks;

iii. Adapting to the implications of climate change at both a strategic and detailed design level;

iv. Promoting energy efficiency and increasing the supply of renewable energy;

and

v. Maintaining ecological resilience;

vi. Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance. Highly vulnerable development, as defined in TAN15: Development and Flood Risk, should not be located within zone C2;

vii. Preventing development that increases flood risk; and

viii. Assesses the potential effects of climate change when preparing a Flood Consequence Assessment for the site."

Policy SP19: Green Infrastructure

4.5.48 This policy sets out a requirement to maintain the extent, quality and connectivity of multi-functional green (and blue) infrastructure both on and near sites and where appropriate to enhance it through various actions.

Policy NE1: International and National Nature Conservation Designations

4.5.49 Several principles for development likely to affect protected sites or species are set out in this policy. Firstly, where development is likely to significantly affect a protected site of international importance the need for a HRA is set out and a requirement to only permit developments where either no adverse effects upon the integrity of the site/habitat can be ascertained or where there are Imperative Reasons of Overriding

Public Interest and compensatory measures. For Nationally Designated Sites development that is likely to impact their special features will only be permitted in exceptional circumstances and where appropriate compensation can be provided. Finally, with regard to protected species, where impacts are identified permission will only be granted if there is no satisfactory alternative and if *"there is no detrimental impact to the maintenance of the population concerned at a favourable conservation status in its natural range"*.

Policy NE2: Local Designations for Nature Conservation and Geological Importance

4.5.50 This policy sets out requirements where development would adversely affect the nature conservation and/or geological importance of locally designated sites, habitats and species. In such cases, permission will only be granted in exceptional circumstances where there is no satisfactory alternative location and compensation measures are provided such that *"there is no reduction in the overall nature or geological conservation value of the site"*.

Policy NE3: Trees, Woodlands and Hedgerows

4.5.51 Policy NE3 seeks to protect trees, woodlands and hedgerows of significant *"public amenity, natural or cultural heritage value or those that provide important ecosystem services"* by not permitting development that would cause unacceptable harm to them. Requirements for development in existing and prosed woodlands are set out, along with a requirement for adequate mitigation where adverse effects cannot be justifiably avoided.

DM1: Development Management Considerations

4.5.52 This policy sets out the key considerations for all proposals within the Plan Area and state that they must:

"i. Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape in terms of their siting, layout, scale, height, design, density, use of materials and landscaping;

ii. Not have an unacceptable effect on the amenity of the occupiers of nearby properties/land; and provide a satisfactory standard of amenity for the occupiers/users of the development itself;

iii. Safeguard the environment from the adverse effects of pollution of water, land, noise, light or air, or land instability, arising from development;

iv. Take account of personal and community safety and security in their design and layout;

v. Prioritise walking, cycling and public transport use ahead of travel by car;

vi. Not give rise to highway safety, pedestrian safety or parking problems on site or in the locality;

vii. Contribute to low carbon communities through energy efficiency, be designed to minimise the use of non-renewable energy, water and the production of waste both during construction and when in use;

viii. Not increase the risk of flooding but make adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;

ix. On sites which have previously been developed, new development proposals should make use of existing suitable building materials wherever possible for appropriate uses in order to re-use recyclable materials and reduce the amount of imported materials; and

x. Ensure that any risks arising from past coal mining, as indicated on the constraints map, can be adequately managed."*

Policy T1: Managing Transport Impacts

4.5.53 Policy TM1 sets out requirement for the support of new development, which include: facilitating increased journeys via more sustainable modes of travel, per the transport hierarchy; mitigating significant adverse effects upon the transport network and highway safety and operation; providing appropriate levels of a parking as well as suitable and safe access arrangements; and, facilitating access for all. Requirements for a Transport Assessment and Travel Plan for development that would generate significant movements are also set out.

Policy MW1: Minerals Safeguarding

4.5.54 This policy sets out requirement for permitting development within the Mineral Safeguarding Areas defined on the proposals maps, with development only permitted where a Mineral Safeguarding Assessment is submitted that demonstrates that:

"i. The mineral underlying the site does not merit extraction; or

ii. The need for the non-mineral development outweighs the need to protect the resource; or

iii. The mineral can be satisfactorily extracted prior to the non-mineral development; or

iv. The development is of a temporary nature or can be removed within the timescales within which the mineral is likely to be needed; and

v. Essential infrastructure that supports the supply of minerals would not be compromised or would be provided elsewhere"

Policy MW2: Mineral Buffer Zones

4.5.55 Policy MW2 allocates mineral buffer zones (which are defined on the proposals maps) around several operational quarries and mineral extraction areas, as well and an extant planning permissions for mineral extraction. The objective is to ensure that proposed development does not *"compromise current or planned mineral extraction"*, as well as to manage applications for mineral extraction in those allocations to ensure that sufficient buffers are maintained to sensitive development.

Policy MW5: Sustainable Waste Management

4.5.56 This policy requires demonstration of how the production of waste will be minimised and sustainably managed in accordance with the waste hierarchy. It also seeks to minimise conflicts between sensitive development and waste management uses, and in particular sets a requirement for sensitive development within 250m of Hafod landfill to demonstrate that no adverse effects would arise from the landfill site.

Policy RE2: Renewable Energy Schemes

4.5.57 This policy sets out clear support for developments that would generate renewable and low carbon energy. It states that:

"i. Proposals for solar farms <10MW will be directed to the solar local search areas (LSA) identified on the Proposals Map[61];

ii. Outside LSAs proposals for wind, solar, biomass, energy from waste, anaerobic digestion, hydropower and other renewable sources will be supported in appropriate locations.

In assessing such proposals consideration will be given to the impacts of the development on the landscape, the number, scale, size, design and siting of renewable installations and associated infrastructure, alone, cumulatively and in combination."

4.5.58 The supporting paragraphs to the policy also note that the Renewable Energy Assessment suggested that *"there is significant potential within the whole of the County Borough for the development of renewable and low carbon technologies and developers are encouraged to explore all aspects of the County Borough's capability to contribute to lowering UK carbon emissions within the energy sector."*

Wrexham Local Development Plan 2013-2028 Proposal Maps

4.5.59 The Wrexham LDP Proposal Maps form part of the LDP adopted in December 2023 and subsequently returned to the status of 'unadopted' on 12 June 2025. The maps identify that parts of the Site are affected by the following policy allocations:

i) Local Search Area – Solar Energy development
ii) Green Wedge - Rhostyllen and Johnstown
iii) Clay safeguarding Area
iv) Hafod Waste Buffer Area
v) Non-Energy Mineral Extraction Exclusion Area
vi) Special Landscape Area

[61] *It also notes that proposal with an installed capacity above 10MW are DNS and thus are considered by the Welsh Ministers under policies in Future Wales*

vii) Welsh Language Sensitive Area

Wrexham Local Development Plan 2013-2028 Constraints Maps

4.5.60 The Wrexham LDP Constraints Maps also form part of the LDP adopted in December 2023 and subsequently returned to the status of 'unadopted' on 12 June 2025. There are two constraints identified on these maps which affect the Site itself, specifically where cable routes are proposed; Flood Zone C2 which intersects the B5426 at two locations, and a Coal and Development High Risk Area which affects a circa 100 m stretch of the B5426 east of Vinegar Hill.

4.5.61 The Constraints Maps identify several other constraints in proximity to the Site, as follows:

i) Scheduled Ancient Monument – Wats Dyke, Offa's Dyke
ii) Site of Special Scientific Interest - Stryt Las a'r Hafod
iii) Special Area of Conservation - Johnstown Newt Sites
iv) Local Designated Sites of Nature Conservation
v) Flood Zone C2

Wrexham County Borough Council Local Planning Guidance Notes (LPGNs)

4.5.62 The following LPGNs are potentially relevant, though it is noted that they were prepared whilst the Wrexham Unitary Development Plan was the adopted Development Plan for the LPA and that they are yet to be revised following the adoption of the Wrexham LDP.

LPGN 07 – Landscape and Development (2003)

4.5.63 The Landscape and Development LPGN[62] states that *"in assessing planning applications both the design of buildings and their external environment and landscape are taken into account, and on many developments, the requirement to provide a landscape scheme to the Council's approval and to subsequently implement and maintain the scheme is a condition of planning permission"*. It sets out guidance on general considerations relating to landscape, the type and level of

[62] https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-7e.pdf

information required for planning applications, implementation and maintenance, and general advice on landscape design and sustainable landscapes.

LPGN 17 – Trees and Development (2012)

4.5.64 The main purpose of the Trees and Development LPGN[63] is to provide guidance on the protection of trees, and to highlight and ensure the benefit of trees as an integral part of design. The LPGN also notes that whilst it uses the term 'tree' much of its guidance also applies to hedgerows and large significant shrubs. It sets out expected levels of information for different categories of application, guidance on design and planting, approach to surveys and the content and scope of information relating to trees, and aftercare expectations. The Statutory Protection system for trees is also noted.

LPGN 31 - The Welsh Language and Welsh Communities (2011)

4.5.65 LPGN 31[64] is intended to protect the Welsh language and Welsh communities by ensuring that the impacts of development on these features are considered in planning decisions.

LPGN 32 – Biodiversity and Development (2011)

4.5.66 The intention of the Biodiversity and Development LPGN[65] is to *"raise the quality and profile of nature conservation, protected species and biodiversity issues"*. Guidance is set out for where ecological assessment will be required and what that should entail, avoidance of harm, mitigation compensation and enhancement, and monitoring management and compliance of commitments made in applications. Reference is also made to the need for Appropriate Assessment in certain cases.

LPGN 35 - Great Crested Newt Mitigation Requirements (2018)

4.5.67 The Great Crested Newt Mitigation Requirements LPGN sets out advice and guidance for development affecting Great Crested Newts (GCN). It notes the derogation tests that apply in such cases and the need for mitigation or compensation as part of development that affects GCN or their habitat. The

[63] https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-17e.pdf
[64] https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-31e.pdf
[65] https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-32e.pdf

additional requirement for Appropriate Assessment of development in proximity to the Johnstown Newt Site Special Area of Conservation (SAC) is also noted, along with expected approaches to development affecting that and other similar SACs.

5.0 PLANNING ASSESSMENT

5.1 Introduction

5.1.1 This section of the Planning Statement provides an assessment, considering the outcomes of the technical assessment work presented with the application, of the Proposed Development in relation to the key planning policy matters and material considerations identified in Section 4.0. The section demonstrates the acceptability of the Proposed Development in planning terms.

5.1.2 The following key topics are considered in this assessment:

i) Principle of the Development;
ii) Landscape and Visual Effects;
iii) Ecology and Nature Conservation;
iv) Cultural Heritage and Archaeology;
v) Noise and Vibration;
vi) Transport;
vii) Flood Risk and Drainage;
viii) Agricultural Land Use; and
ix) Air Quality.

5.2 Principle of the Development

5.2.1 Wales is already being affected by climate change, manifesting in increased temperatures and increased annual rainfall[66]. The Welsh Government and WCBC have declared a climate emergency. In 2021 the Welsh Government committed Wales to legally binding targets to deliver the goal of net-zero by 2050.

5.2.2 The policy message at both a local and national level is unambiguous in the support for the development of new renewable energy schemes.

5.2.3 Welsh Government Policy acknowledges that a key contributor to the delivery of the net zero targets is renewable energy development. Future Wales, the highest tier of development plan in Wales, strongly supports the principle of renewable technology at all scales. This message is primarily delivered through Policies 17, 18 and 33.

[66] CCRA-Evidence-Report-Wales-Summary-Final.pdf

Policy 17 requires that: "*In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments*".

5.2.4 Policies 17 and 33 recognise the contribution that renewable energy technologies have towards generating 70% of electricity consumption by renewable means by 2030, which was increased to 100% in the Minister for Climate Change's Written Statement[67], published on 14 July 2023. Welsh energy policy, specifically *Prosperity for All: A Low Carbon Wales*, seeks to accelerate the deployment of renewable generation by supporting the development of energy planning at the local and regional level. Policy 18 sets out criteria for assessing large scale proposals for renewable and low carbon energy and is considered under the topic specific sub-headings below.

5.2.5 PPW also highlights the Welsh Government's commitment to renewable energy and recognises the wider environmental, social and economic benefits and opportunities that can be delivered by renewable and low carbon energy development. PPW states that *"The Welsh Government's highest priority is to reduce demand wherever possible and affordable. Low carbon electricity must become the main source of energy in Wales".*

5.2.6 These policies illustrate the Welsh Government's support in principle for all renewable energy projects and technologies and highlights that such developments can deliver positive social, environmental, cultural, and economic benefits.

5.2.7 WCBC demonstrates its support for renewable energy primarily through Policy PS12 of the UDP and Objective SO10 and Policy RE2 of the LDP. Objective SO10 is clear that WCBC aims to increase the resilience of the borough to climate change by "*reducing carbon emissions and the demand for energy, promoting the use of renewable resources, avoiding developing in areas of known flood risk and using a green infrastructure based approach to the planning and design of new development*".

[67] *Written Statement: Publication of Summary of Responses to the Consultation on Wales' Renewable Energy Targets (14 July 2023) | GOV.WALES*

5.2.8 The supporting text to Policy RE2, at paragraph 4.226 refers to the renewable energy assessment undertaken to inform the LDP, recognising "*that there is significant potential within the whole of the County Borough for the development of renewable and low carbon technologies*". The policy wording of Policy PS12 is clear that proposals for solar farms will be supported in appropriate locations, where the impacts of the proposals have been considered.

5.2.9 LDP Policy RE2 identifies that smaller solar farm proposals will be directed to the Local Search Areas identified on the proposals map. Although not an adopted policy, Policy RE2 is helpful in understanding WCBC's intentions with regard to locations which may be considered particularly suitable for forthcoming solar development. The majority of the Site is identified as being within the Local Search Area 'Area 1 South Wrexham'.

5.2.10 The electricity generated by the Proposed Development would be enough to meet the needs of over 34,775 typical Welsh homes, thereby making a significant contribution to meeting the demand for electricity within Wrexham. Through the production of this renewable energy, the Proposed Development would result in an approximate saving of over 2.3 million tonnes of CO_2, the equivalent to planting over 39 million trees[68]. The Proposed Development would therefore demonstrably support the climate objectives of national and local policy. The inclusion of battery storage in the scheme would ensure the energy generated from the solar panels is maximised, enabling surplus energy to be stored and released depending on demand. Therefore, the Proposed Development would make a positive contribution towards sustainable development as a zero-carbon energy source and should be considered favourably, in line with Future Wales, PPW and the UDP.

5.2.11 Policies 17 and 18 of Future Wales provide a decision-making framework specifically for renewable and low carbon technologies qualifying as Developments of National Significance. The topic specific planning assessment below focuses on these policies, as well as the relevant provisions elsewhere in Future Wales, and in PPW and the UDP.

[68] *Calculated using Greenhouse Gas Equivalencies Calculator | US EPA*

5.3 Landscape and Visual Effects

5.3.1 A detailed Landscape and Visual Assessment (LVIA) has been prepared in accordance with the Guidelines for Landscape and Visual Assessment (Third Edition, 2013) and is contained within Chapter 6.0 of the Environmental Statement (ES) submitted in support of this application.

5.3.2 The landscape is predominantly rural and agricultural in character. The array areas comprise agricultural fields of various sizes, shapes and topography. Field boundaries generally comprise mature hedgerows, some including mature trees. In the EAA field boundaries are typically open, with some mature tree cover located along them.

5.3.3 The Clwydian Range and Dee Valley National Landscape (previously known as an Area of Outstanding Natural Beauty (AONB)) (CRDV National Landscape) is approximately 0.8 km west of the western extent of the proposed underground cable grid connection route at its closest point and is approximately 3.5 km southwest of the closest solar array area, the WAA, at its closest point. ES Figure 6.1 shows land approximately 175 m south of the EAA at its closest point, designated as a Special Landscape Area (SLA), a non-statutory local landscape designation. This SLA is from the now unadopted LDP referred to in Section 4.4 above.

5.3.4 This SLA is identified in WCBCs 'Special Landscape Areas Study'[69], dated January 2017 as SLA 004: Lower Dee Floodplain.

5.3.5 Land within and between the proposed solar array areas generally falls west to east and land within the EAA falls southwards towards the Dee floodplain. The western edge of the WAA is at approximately 100 m above ordnance datum (AOD) and land within the most-eastern part of the EAA and Site overall falls to approximately 15 m AOD. There are minor undulations within and between each proposed solar array area, and the topography of the Site is most varied within the CAA.

5.3.6 As previously set out, the majority of the Site is located within a 'Local Search Area' for solar development where LDP Policy RE2 directs new renewable energy installations.

[69] TACP (2017). *Special Landscape Areas Study*. Available from Wrexham County Borough Council.

5.3.7 A Zone of Theoretical Visibility (ZTV) was undertaken as part of the LVIA. ZTV mapping at ES Figure 6.2a-j shows that theoretical visibility of the proposed solar arrays in the WAA and the CAA is localised with only small areas of theoretical visibility further afield in the 2.5 km Study Area, to the south and southwest in relation to the WAA and to the northeast and east in relation to the CAA.

5.3.8 Theoretical visibility of the proposed solar array in the EAA extends across a wider area compared to the WAA and CAA, predominantly south and southeast of the CAA.

5.3.9 ZTV mapping also indicates that there are very few locations outside of the Site boundary where more than 20% of any of the three proposed solar arrays are predicted to be visible.

5.3.10 Theoretical visibility of the Proposed Development in the CRDV National Landscape over 2.5 km from the Site, is shown on ES Figures 6.2b and 6.2g-j and analysed in ES Chapter 6, Section 6.5.

5.3.11 The Proposed Development would introduce solar development into the predominantly rural, agricultural landscape resulting in a noticeable change to character within the Site, but resulting in a limited and generally localised influence on landscape character beyond the proposed solar array areas.

5.3.12 Following the establishment and maturing of proposed hedgerow and tree planting in the short and medium-term, the level of effect to the LCA 13a: Welsh Maelor would reduce to Not Significant (as defined in ES Chapter 6.0). 6.7.47 The Proposed Development would not alter the characteristics of other Landscape Character Areas within the 2.5km study area. Therefore it is concluded that the Propsoed Development would not result in an unacceptable impact on any designated landscape.

5.3.13 Effects on the character of the landscape within the Lower Dee Floodplain SLA and on the special valued qualities of this designated landscape would be not significant.

5.3.14 None of the statutory purposes or special qualities of the Clwydian Range and Dee Valley National Landscape would be materially affected by any change in landscape character or visual change arising as a result of the Proposed Development. Nor would the natural beauty of land within the designation boundary be affected by change resulting from the Proposed Development.

5.3.15 The Proposed Development would not result in any unacceptable adverse visual impacts on nearby communities and individual dwellings (following the establishment and maturing of proposed hedgerow and tree planting as shown on the Landscape Masterplan). Thus Criterion 2 of Policy 18 in Future Wales would be met.

5.3.16 The Landscape Masterplan proposals have been prepared in accordance with the principles of UDP Policies EC, EC5, PS11 and LDP Policy SP19, NE3 and NE5. In addition to mitigating visual impacts, the landscaping proposed would enhance biodiversity opportunities within the Site.

5.3.17 Criterion 1 of Policy 18 in Future Wales provides that renewable and low carbon energy projects qualifying as DNSs will be permitted where *"the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)*" and "*there are no unacceptable adverse visual impacts on nearby communities and individual dwellings".*

5.3.18 In light of the above, the LVIA demonstrates the compliance of the Proposed Development with Criterion 1 of Policy 18, and UDP Policies PS2, PS11, PS12 and GDP1 in relation to landscape and visual impacts.

5.3.19 Criterion 7 of Policy 18 in Future Wales requires that there are no unacceptable impacts of renewable energy development, with regard to shadow flicker, noise, reflected light, air quality or electromagnetic disturbance. Considerations of relevance to the Proposed Development are noise, reflected light and air quality. The potential for noise and air quality impacts is considered elsewhere in this Planning Statement. With regard to reflected light, a Glint and Glare Assessment has been completed (ES Appendix 4.4). This assessment considered the potential for solar reflections to impact upon road safety, residential amenity, and aviation activity. The assessment identified that no unacceptable impacts on these receptors would result from the Proposed Development. As such, Criterion 7 of Policy 18 of Future Wales is met with regard to the need to consider reflected light.

5.4 Ecology and Nature Conservation

5.4.1 An Ecology Assessment has been prepared and is presented within Chapter 5.0 of the ES. A comprehensive series of ecological surveys were undertaken for the Site to determine whether the Proposed Development has the potential to give rise to any

significant adverse effects on the existing ecology resources. The conclusions of the survey work are reported on within Chapter 5.0 and ES Appendices 5.1 to 5.5 of the ES.

5.4.2 Criteria 3 and 4 of Policy 18 in Future Wales state that renewable and low carbon energy projects qualifying as DNSs will be permitted where the proposal does not have an adverse effect on the integrity of internationally designated sites and the features for which they have been designated, or on national statutory designated sites for nature conservation, protected habitats and species. Criterion 5 requires that the proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity.

5.4.3 Johnstown Newt Sites SAC and the underlying Stryt Las a'r Hafod SSSI are located immediately adjacent to the Cable Route and are designated for presence of great crested newt.

5.4.4 Yorke's Dingles and Well Wood WSW and Oak Wood WSW are located partially within and immediately adjacent to the CAA, while Hopyard Wood WSW is located immediately adjacent to the EAA.

5.4.5 Ancient woodland is located immediately adjacent to the CAA and EAA. In addition, 17 veteran trees have been identified within the Site.

5.4.6 Evidence of protected species has been obtained through a desk study (including review of data obtained from the Local Environmental Records Centre for North Wales and DataMapWales) and habitat survey work.

5.4.7 ES Chapter 5 confirms that during construction and operation there would be negligible impacts on the statutory designated sites of Johnstown Newt Sites SAC or Stryt Las a'r Hafod SSSI, and their mobile qualifying features. It also confirms that there would be negligible impacts to Non-statutory Designated Sites for Nature Conservation during the construction and operational phases.

5.4.8 ES Chapter 5 also considered potential for impacts on priority habitats and protected species; negligible impacts on these receptors during the construction phase have been identified through the assessment.

5.4.9 Through operation, the Proposed Development would result in a minor beneficial effect to priority habitats, on-site habitats and foraging and commuting bats through

the implementation of the embedded landscape design. These landscape proposals would provide biodiversity gains through the inclusion of native woodland and hedgerow planting, as well as creation of species rich grassland.

5.4.10 ES Chapter 5 concludes that, accounting for enhancement measures, the Proposed Development would result in no adverse effects to any ecological receptor.

5.4.11 In light of the above, there would be no adverse effects on the integrity of internationally designated sites and their designated features, or on national statutory designated sites for nature conservation, protected habitats and species. The Proposed Development includes biodiversity enhancement measures to provide a net benefit for biodiversity. As such, it is considered that the Proposed Development meets Criteria 3, 4 and 5 of Policy 18 of Future Wales, PPW, and UDP Policies PS11 and PS12.

5.5 Cultural Heritage and Archaeology

5.5.1 A Cultural Heritage and Archaeology Assessment has been undertaken and is presented within Chapter 7.0 of the ES. The Assessment provides an assessment of the effects of the Proposed Development upon archaeological and cultural heritage assets and recommends mitigation measures to reduce identified impacts.

5.5.2 Future Wales Policy 18 states that proposals for renewable and low carbon energy projects qualifying as Developments of National Significance will be permitted subject to numerous criteria, including Criterion 6. Criterion 6 requires that the proposal would not give rise to any unacceptable adverse impacts on statutorily protected built heritage assets. PPW, specifically Section 6, states that it is important the planning system looks to protect, conserve and enhance the significance of historic assets and requires that planning decisions must fully consider the impact of a proposal on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place[70]. LDP Policy SP15 states that development will only be supported where it conserves, protects, preserves, or enhances the designated and undesignated cultural and historic assets listed in the policy. UDP Policy EC11 concerns archaeology.

[70] *Paragraph 6.1.9 Planning Policy Wales - Edition 12*

5.5.3 ES Chapter 7.0 and its appendices identify that there are 31 Listed Buildings, 14 Scheduled Monuments and a Grade I Registered Historic Park and Garden located within 1 km of the Site. The impacts of the Proposed Development on these features, and other features located further afield (detailed in ES Appendix 7.4), has been assessed as ranging from a Negligible to a Minor Adverse (Not Significant) effect following the implementation of mitigation (in the form of additional landscaping measures along existing hedgerow boundaries in the west of the CAA).

5.5.4 Potential for impacts on buried archaeological remains has also been assessed and is presented in ES Chapter 7.0. Geophysical survey of the Site (reported in ES Appendix 7.5) identified a concentration of anomalies of archaeological origin (Assets 805-809[71]) which potentially date from later prehistory through to the medieval period. A suite of archaeological investigation work and mitigation is proposed to ensure that direct impacts upon buried archaeological remains being mitigated allowing for any remains to be 'preserved by record' and for an enhancement of the current levels of knowledge regarding the survival and composition of the anomalies identified during geophysical survey. In view of the extensive survey work undertaken on this Site, it is envisaged that the trial trench evaluation could be undertaken post-determination with the proviso that if significant remains are identified, further mitigation such as the application of a 'no dig' design, would be implemented. The mitigation proposed would ensure that impacts on these features and other archaeological features would not be significant.

5.5.5 In light of the above, the Proposed Development would not give rise to unacceptable adverse impacts on statutorily protected built heritage assets or archaeological features. Thus, the requirements of Criterion 6 of Future Wales Policy 18, and the objectives of PPW Section 6, UDP Policy EC11 and Policy SP15 of the LDP would be met.

5.6 Noise and Vibration

5.6.1 An assessment of the potential for the Proposed Development to give rise to Noise and Vibration impacts is provided at ES Chapter 8.0 of the ES. This assessment has had regard to the requirements of PPW, TAN 11, guidance for assessing impacts on

[71] These features comprise the remains of a probable oval enclosure (Asset 805), linear features (Asset 807) and a possible ring ditch (Asset 809).

sensitive human receptors as a result of noise and vibration arising from construction activities (BS5228) and guidance for the assessment of industrial and commercial sound (BS4142).

5.6.2 The nearest noise sensitive receptors (NSRs) are all residential properties and are broadly located within Middle Sontley, Gyfelia, Stryt-yr-hwch, Crabtree Green, Eyton, Cock Bank, Royton, Porthwgan and surrounding areas. NSRs located at a greater separation distance from the Site would expect to be subject to lower noise and vibration effects than those assessed.

5.6.3 Criterion 7 of Future Wales Policy 18 requires that proposals must not give rise to unacceptable adverse impacts by way of multiple factors, including noise.

5.6.4 ES Chapter 8.0 states that subject to the implementation of appropriate mitigation (detailed at Section 8.6 of ES Chapter 8.0), the Proposed Development is predicted to have a 'low impact' at the NSRs during both the day-time and night-time period, with reference to BS 4142:2014+A1:2019 methodology. Thus noise and vibration effects experienced at the nearest sensitive receptors would not be significant during either the construction or operational phases.

5.6.5 Accordingly, the Proposed Development is considered to be compliant with UDP Policy GDP1, and Future Wales Policy 18 Criterion 7.

5.7 Transport

5.7.1 A Transport Statement and Outline Construction Traffic Management Plan (oCTMP) have been prepared to accompany the application.

5.7.2 Future Wales Policy 18 Criterion 9 requires that renewable and low carbon energy projects must not result in any unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation. UDP Policy GDP1 and Policies SP11 and T1 of the LDP reflect this requirement.

5.7.3 The construction works are expected to last between 39 and 52 weeks and construction activities would take place 5.5 days per week. Construction traffic would route to all parts of the Site via the A483 Junction 2 and the B5426. The Proposed Development incorporates six separate Site accesses from the road network (A – F). The proposed new access junctions would incorporate appropriate visibility splay

requirements for the observed 85th percentile vehicle speeds. Suitable provision for access and egress by the largest anticipated HGVs at the Site would also be made at Site access junctions. It is therefore considered that the proposed access strategy will provide safe and appropriate access and egress to the Site.

5.7.4 The Transport Statement assesses the traffic generation of the temporary construction phase and identifies that there would be a maximum of approximately 64 two-way movements (including 24 HGVs two-way) per weekday, split across the various Site accesses. This level of traffic generation is low in absolute terms and would not be expected to result in any material impact on highway safety or the free flow of traffic on the surrounding highway network.

5.7.5 Once operational, trips to the Site would be limited to the occasional LGV access to the Site for maintenance purposes and would be de minimis in nature.

5.7.6 The Outline CTMP details how site access would be managed. The management measures include allocation of specific delivery slots for HGV deliveries which would minimise the level of vehicular activity taking place at, and on approach to, the Site at any one time and would also mitigate any potential inter-vehicular conflicts.

5.7.7 The largest vehicles anticipated to require access to the Site during the construction period would be 16.5m long low-loader HGVs which will not require abnormal load permissions.

5.7.8 There are a several PRoWs that operate through / adjacent to the Site. There may be some impact on the PRoW network during the construction phase. The affected PRoWs would be subject to temporary closures / diversion orders, or would remain open as existing and subject to careful management during the course of the construction works. The PRoW mitigation measures would be set out within the detailed CTMP produced following appointment of a Principal Contractor. It is proposed to retain the PRoWs in the operational layout. The PRoWs would be widened to 10 m from their current 1 m width when the Development is operational. Additionally, there would be over 3km of new permissive paths introduced within the site, improving connectivity of existing networks in the area.

5.7.9 On the basis of the evidence presented in the Transport Statement and the CTMP, no unacceptable impact on highway safety and no severe residual cumulative traffic impact would be created by the Proposed Development. Therefore the Proposed

Development accords with the requirements of Future Wales Policy 18 Criterion 9, PPW, UDP Policy GDP1 and Policies SP11 and T1 of the LDP.

5.8 Flood Risk and Drainage

5.8.1 A Flood Consequence Assessment and Drainage Strategy (FCADS) has been prepared and is provided as a standalone accompanying report. The FCADS includes for the potential effects of climate change.

5.8.2 The NRW Flood Map for Planning shows that the majority of the Site is at very low risk of flooding, with some small corridors of Flood Zone 2 and 3 along the corridors of small watercourses and ditches located within the Site.

5.8.3 Minimal flooding is shown to encroach in the location of the solar panels near to the ditch location in the northern extent of the EAA. The panels will be raised on supports elevated above ground levels and would not be impacted by any potential flooding.

5.8.4 Rainfall runoff from the solar arrays will infiltrate to the land beneath and between the panels and therefore the FCADS finds that the solar arrays will not result in an increase in the surface water runoff rates and volumes.

5.8.5 The FCADS considers the risk of flooding from all sources and finds that the risk is very low, with flood risk constrained to landscaped areas adjacent to ditches within the site. As such, the FCADS concludes that no flood risk mitigation measures are required, and the development is considered to comply with TAN15.

5.8.6 The Proposed Development therefore meets the requirements of TAN 15 and is in line with Policies GDP1 and EC12 of the UDP, and SP18 and DM1 of the LDP.

5.9 Agricultural Land Use

5.9.1 An Agricultural Land Classification (ALC) survey has been undertaken, provided as a standalone report accompanying the application. The ALC survey identifies that the vast majority of the Site (89%) is classified as being Grade 3b or Grade 4. Approximately 11% (14.4ha) of the Site is classified as Grade 3a.

5.9.2 With the exception of the proposed substation and Site access tracks, the Site could continue to be grazed by livestock, and would therefore remain in agricultural use during the operational life of the Proposed Development. Once the operational life of

the Proposed Development comes to an end, the agricultural fields would be restored to their current condition.

5.9.3 UDP Policy EC2 confirms that '*Development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land*'. Only 11% of the Site is located within any of these grades. In light of this and given the land would remain in agricultural use during the operational life of the Proposed Development, and would then be fully restored, it is considered that the Proposed Development meets the requirements of UDP Policy EC2.

5.10 Air Quality

5.10.1 Criterion 7 of Policy 18 in Future Wales requires that there are no unacceptable impacts of renewable energy development with regard to, amongst others discussed previously, air quality. Following the adoption of a Scoping Direction by PEDW, a Technical Note (appended to the ES) was prepared to inform discussions between the Applicant and Natural Resources Wales. The Technical Note considered the potential for the Proposed Development to give rise to impacts on air quality and whether this would be likely to result in effects on ecological receptors. The Technical Note provided an Air Quality Screening Assessment. The Technical Note concludes that through the incorporation of in-design mitigation and standard dust mitigation measures, no unacceptable impacts or resulting effects on ecological receptors are expected. On consideration of the Technical Note, NRW confirmed their agreement (by email on 23 July 2025, appended to the ES) that Air Quality did not need to form part of the EIA and that best working practices and mitigation measures as a control against the impact of airborne dust should be included within the OCEMP.

5.10.2 In light of the above, the requirements of Criterion 7 (in relation to air quality) and UDP Policy GDP1 and LDP Policy DM1 would be met.

5.11 Mineral Safeguarding Assessment

5.11.1 Policy SP16 of the now un-adopted LDP outlines the approach to be taken to the safeguarding of important mineral resources within the County Borough, including maintaining an adequate supply of minerals over the plan period. Policy SP16 seeks the protection of minerals from unnecessary sterilisation by directing new development away from areas underlain by mineral of importance. LDP Policy MW1 reflects SP16 by stating non-mineral development within Mineral Safeguarding

Areas (as defined on the Proposals Map) will not be permitted unless certain circumstances apply.

5.11.2 The southern section of the EAA and sections of the Cable Routes (primarily the inter-array cale route sections and stretches of the route from the WAA substation to Legacy substation, which are all located within existing highways) interact with areas identified on the Proposals Map as 'Clay Safeguarding Areas'.

5.11.3 Where the sections of Cable Routes are affected by the Clay Safeguarding Areas, the designation in this area is intersected by numerous highways and covers small pockets and corridors of safeguarded mineral. The size of these areas of safeguarded mineral would likely constrain their extraction. Even if extraction of these resources were viable, the existing highways would likely need to be retained to facilitate the export of the mineral or the products manufactured from it. The Cable Routes would therefore not affect, or be affected by, the extraction of mineral resources located in the Clay Safeguarding Areas which interact with the Site.

5.11.4 The majority of the EAA, including the area within the Clay Safeguarding Area, is within the Local Search Area for solar development (subject of Policy RE2). In fact, there are multiple pockets of Clay Safeguarding Area located within the Local Search Area for solar development. In identifying these Local Search Areas, WCBC recognised that the greatest potential for delivering renewable energy in the County Borough is through solar power. Therefore, if the potential for the County Borough to contribute to the delivery of renewable energy targets is to be realised, it is inevitable that solar development will need to come forward within Clay Safeguarding Areas. Furthermore, the reversible nature of the solar array development is such that any exploitable mineral resource would not be permanently sterilised.

5.11.5 Finally, the need for the urgent delivery of renewable energy projects like the Proposed Development is emphasised in planning policy; Future Wales requires that: "*In determining planning applications for renewable and low carbon energy development, decision makers must give significant weight to the need to meet Wales' international commitments*".

5.11.6 In light of the above, the Proposed Development is found to be in accordance with LDP Policy MW1 because exception criteria ii), iv) and v) would be met on the basis that:

a) the need for the Proposed Development outweighs the need to protect the non-mineral resource;
b) the Proposed Development is of a reversible nature and would not sterilise the mineral resource; and
c) essential infrastructure that supports the supply of minerals would not be compromised by the Proposed Development.

5.12 Policy Assessment Conclusions

5.12.1 The principle of the Proposed Development is demonstrably supported by national and local planning and energy legislation, policy and guidance.

5.12.2 Policies 17 and 18 of Future Wales provide a decision-making framework specifically for renewable and low carbon technologies qualifying as Developments of National Significance.

5.12.3 Policy 17 emphasises the Welsh Government's strong support for the development of renewable and low carbon energy from all technologies and at all scales to meet future energy needs. In determining planning application for renewable and low carbon energy development, Policy 17 also requires decision makers to *"give significant weight to the need to meet Wales' international commitments and our target to generate 70%*[72] *of consumed electricity by renewable means by 2030 in order to combat the climate emergency*". The policy further states that solar developments will not be permitted in National Parks and Areas of Outstanding Natural Beauty, and that proposals should demonstrate that they will not have an unacceptable adverse impact on the environment.

5.12.4 The Proposed Development would result in significant benefits to the local and wider community, as follows:

i) The electricity generated by the Proposed Development would be enough to meet the needs of over 34,775 typical Welsh homes, thereby making a significant contribution to meeting the demand for electricity within Wrexham.

[72] *A target which has been increased to 100% since Future Wales was published (Written Statement: Publication of Summary of Responses to the Consultation on Wales' Renewable Energy Targets (14 July 2023) | GOV.WALES).*

ii) The Proposed Development would result in an approximate saving of over 2.3 million tonnes of CO_2, the equivalent to planting over 39 million trees[73].

iii) Given solar energy represents one of the cheapest forms of energy generation, the Proposed Development would contribute towards the lowering of energy bills in the long term due to the benefits of renewable energy investment across Wales.

iv) Business rates of around £4.8m payable to WCBC over the life of the development.

v) Should the Proposed Development be approved, a £1.5m community benefit fund would be established upon commencement of construction. This would contribute to community projects and initiatives, including rooftop solar installations for residents, village improvements and energy saving measures.

vi) The Proposed Development represents significant capital investment in the area and Wales more widely, with over £200m expected to be spent to complete the project. This spend would likely filter down into the local economy through the use of local contractors for construction, in addition to the use of local hospitality, catering, and accommodation services.

vii) Construction jobs would also be sourced locally where opportunities to do so arise. The local workforce would gain beneficial skill-upgrades through working on the project, thus benefiting the local economy in the long term. RWE already operates a 100 strong future energy apprenticeship scheme out of Coleg Llandrillo, providing young people with the skills needed for a renewable energy future. If necessary to bring in workers from outside the area, revenue would be generated for local businesses and the local economy.

viii) The Proposed Development would provide environmental benefits, including 16ha of new wildflower meadow and around 5km of new tree/hedge planting, to the Site and its surroundings through the incorporation of a landscaping scheme which would deliver considerable net benefit for biodiversity within the Site.

ix) Creation of new community orchards in the CAA.

x) Over 3km of new permissive paths for local residents to use, providing better connectivity to the wider PRoW network.

[73] *Calculated using Greenhouse Gas Equivalencies Calculator | US EPA*

5.12.5 Due to the contribution that the Proposed Development would make towards Wales' renewable energy targets, and given it would comply with all other relevant principles of Policy 17, alongside the net benefits the scheme would provide, it is demonstrably in accordance with Policy 17.

5.12.6 The criteria of Policy 18 are considered in the table below.

Table 5.1 Future Wales Policy 18 Criteria Compliance Assessment

Criterion	Assessment of Compliance
1. Outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty).	As described in Section 5.3 of this Planning Statement, the Proposed Development would introduce solar development into a predominantly rural, agricultural landscape resulting in a noticeable change to character from baseline within the Site, but which would have a limited and generally localised influence on landscape character beyond the proposed solar array areas. None of the statutory purposes or special qualities of the Clwydian Range and Dee Valley National Landscape would be materially affected by any change in landscape character or visual change arising as a result of the Proposed Development. Nor would the natural beauty of land within the designation boundary be affected by change resulting from the Proposed Development. In light of the above, the Proposed Development complies with this criterion.
2. There are no unacceptable adverse visual impacts on nearby communities and individual dwellings.	As described at Section 5.3 of this Planning Statement, the LVIA identified that the Proposed Development would not result in any unacceptable adverse visual impacts on nearby communities and individual dwellings (following the establishment and maturing of proposed hedgerow and tree planting as shown on the Landscape Masterplan). In light of the above, the Proposed Development complies with this criterion.
3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured).	Johnstown Newt Sites Special Area of Conservation (SAC) is located immediately adjacent to both Cable Route options, and as such there is potential for impacts on mobile qualifying features (great crested newt) for which the site is designated. Works will be confined to the existing roadways only and will not directly affect habitats within the SAC. No impacts to the Johnstown Newt Sites SAC are anticipated from works within the array areas. Following initial mitigation measures, including best practice measures detailed within Section 5.7, Chapter 5.0 of the ES, no impacts on mobile qualifying features of Johnstown Newt Sites SAC are anticipated and the ES concludes the Proposed Development would result in negligible impacts on this receptor of international importance. There are no pathways by which Johnstown Newt Sites SAC could be affected during operation.

Criterion	Assessment of Compliance
	In light of the above, the Proposed Development complies with this criterion.
4. There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species.	Stryt Las a'r Hafod SSSI is located immediately adjacent to the Cable Route and as such there is potential for impacts on mobile qualifying features (great crested newt) for which the site is designated. Works will be confined to the existing roadways only and will not directly affect habitats within the SSSI. No impacts to the Stryt Las a'r Hafod SSSI are anticipated from works within the array areas. Following initial mitigation measures, including best practice measures detailed within Section 5.7, Chapter 5.0 of the ES, no impacts on mobile qualifying features of SSSI are anticipated and the ES concludes the Proposed Development would result in negligible impacts on this receptor of national importance. There are no pathways by which Stryt Las a'r Hafod SSSI could be affected during operation. In light of the above, the Proposed Development complies with this criterion.
5. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity.	As concluded at ES Chapter 5.0, the Landscape Masterplan includes measures that will provide an overall enhancement for biodiversity. The Landscape Masterplans include: Provision of development-free buffers alongside existing landscape features, including hedgerow, trees and public rights of way and retention of existing vegetation cover (which defines character and provides visual screening), as far as possible. New planting of mixed native hedgerow and tree species of local provenance to infill gaps in hedgerows, where consistent with landscape character in the Study Area and where it provides further screening. New tree and hedgerow planting for each of the proposed solar array areas. In light of the above, the Proposed Development complies with this criterion.
6. There are no unacceptable adverse impacts on statutorily protected built heritage assets.	A Cultural Heritage and Archaeology Assessment has been undertaken and is presented within Chapter 7.0 of the ES. The Assessment provides an assessment of the effects of the Proposed Development upon archaeological and cultural heritage assets. The assessment concluded that the Proposed Development would not give rise to unacceptable adverse impacts on statutorily protected built heritage assets or archaeological features. In light of the above, the Proposed Development complies with this criterion.
7. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air	Due to the nature of the Proposed Development, there will be no unacceptable impacts in relation to shadow flicker, air quality or electromagnetic disturbance.

Criterion	Assessment of Compliance
quality or electromagnetic disturbance.	A Glint and Glare Assessment has been completed (ES Appendix 4.4). This assessment considered the potential for solar reflections to impact upon road safety, residential amenity, and aviation activity. The assessment identified that no unacceptable impacts on these receptors would result from the Proposed Development. ES Chapter 8.0 states that subject to the implementation of appropriate mitigation (detailed at Section 8.6 of ES Chapter 8.0), the Proposed Development is predicted to have a 'low impact' at the NSRs during both the day-time and night-time period, with reference to BS 4142:2014+A1:2019 methodology. Thus noise effects experienced at the nearest sensitive receptors would not be significant during either the construction or operational phases. Therefore, no unacceptable noise impacts have been identified. In light of the above, the Proposed Development complies with this criterion.
8. There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA 7T).	Given the nature and location of the development, no significant impacts upon aviation activity are predicted and the Proposed Development complies with this criterion.
9. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation.	A Transport Statement and Outline Construction Traffic Management Plan (oCTMP) have been prepared to accompany the application. The Transport Statement assesses the traffic generation of the temporary construction phase and identifies that the level of traffic generation is low in absolute terms and would not be expected to result in any material impact on highway safety or the free flow of traffic on the surrounding highway network. The largest vehicles anticipated to require access to the Site during the construction period would be 16.5m long low-loader HGVs which will not require abnormal load permissions. Once operational, trips to the Site would be limited to the occasional LGV access to the Site for maintenance purposes and would be de minimis in nature. The Outline CTMP details how site access would be managed. The management measures would minimise the level of vehicular activity taking place at, and on approach to, the Site at any one time and would also mitigate any potential inter-vehicular conflicts. In light of the above, the Proposed Development complies with this criterion.
10. The proposal includes consideration of the materials needed or generated by the development to ensure the	The Applicant has anticipated that, due to the nature of the project, significant quantities of waste are not anticipated. Any waste arisings would be managed in accordance with the Waste Duty of Care Code of Practice, which implements the duty of care set out in Section 34(1) of the Environmental Protection Act

Criterion	Assessment of Compliance
sustainable use and management of resources.	1990. Waste would be sent to an appropriate waste management facility and managed in accordance with the duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011. Opportunities to minimise waste and to re-use or recycle materials will be explored before resorting to landfill options. A detailed CEMP would be developed post-consent and would detail the types and quantities of waste that would be produced through the construction phase, and how these would be managed in line with the waste hierarchy. In light of the above, the Proposed Development complies with this criterion.
11. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.	At the end of the Solar Farm's 40-year life, the development would be decommissioned, and the Site would be returned to solely agricultural use. The methods used in construction are such that remediation/decommissioning works following the removal of the solar panels, BESS units and associated infrastructure would be relatively easy to achieve. Waste materials would be recycled wherever the potential arises to do so. In light of the above, the Proposed Development complies with this criterion.
12. The cumulative impacts of existing and consented renewable energy schemes should also be considered.	Cumulative effects and impacts of the Proposed Development are considered within each of the technical chapters of the ES. The ES finds there to be no significant cumulative effects.

5.12.7 The above Planning Assessment demonstrates that the criteria of Policies 17 and 18 are met. These policies provide the primary decision making framework for renewable and low carbon technologies qualifying as Developments of National Significance. The Proposed Development has also been found to accord with the relevant policies of the UDP and PPW. Accordingly, the Proposed Development is acceptable in relation to the policy test and should be approved accordingly.

6.0 SUMMARY AND CONCLUSIONS

6.1.1 The electricity generated by the Proposed Development would be enough to meet the needs of over 34,775 typical Welsh homes, thereby making a significant contribution to meeting the demand for electricity within Wrexham. Through the production of this renewable energy, the Proposed Development would result in an approximate saving of over 2.3 million tonnes of CO_2, the equivalent to planting over 39 million trees[74]. The inclusion of battery storage in the scheme would ensure the energy generated from the solar panels is maximised, enabling surplus energy to be stored and released depending on demand. The Proposed Development would therefore demonstrably support the climate objectives of national and local policy.

6.1.2 The ES supporting this Planning Application, along with its associated technical assessments, demonstrate that the Proposed Development would not give rise to any significant environmental impacts. The Proposed Development would provide environmental benefits to the Site and its surroundings through the incorporation of a landscaping scheme which would deliver considerable net benefit for biodiversity within the Site.

6.1.3 The Proposed Development has been appraised against all relevant local and national planning policy and it has been demonstrated that it meets all policy tests. Based upon the foregoing, it is demonstrably the case that the planning application should be approved.

6.1.4 In light of the preceding planning assessment, it is considered that the Proposed Development complies with all criteria set out in Policies 17 and 18 of Future Wales, which provides the primary decision-making framework for renewable and low carbon technologies qualifying as Developments of National Significance.

6.1.5 Additionally, the Proposed Development will result in significant benefits to the local and wider community, as identified in Section 5.0 of this Planning Statement.

6.1.6 It is therefore considered that an appropriate site has been identified for the Proposed Development, based upon the consideration of the relevant and significant

[74] *Calculated using Greenhouse Gas Equivalencies Calculator | US EPA*

factors. The planning balance clearly tips in favour of the proposal. Consequently, planning permission should be granted without delay.