



Craig Y Perthi Solar Farm

Planning Statement

Prepared for

RWE

RWE Renewables UK

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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 application is for the construction and operation of a photovoltaic solar array and associated infrastructure (hereafter referred to as 'the Proposed Development'), on land to the east of Newport, near the village of Bishton. For reader clarity, where 'the Application Site' or 'the Site' is used in subsequent sections of this Statement, this refers to the main 'body' of the site and does not include the grid connection route to the south (unless otherwise specified).
- 1.1.3 The Site lies wholly within the administrative area of Newport City Council (NCC).
- 1.1.4 This introductory section provides a description of the Application Site and its surroundings, details of relevant planning history, and the formal pre-application and public consultation exercise undertaken. It also defines the structure of the Planning Statement.

1.2 Background

- 1.2.1 In April 2024, planning permission DNS 3279787 was sought for the installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers, on the same Site as that which is the subject of this planning application. This previous proposal had a capacity of approximately 99.9 megawatt (MW) export capacity, with associated battery storage, and is hereafter referred to as the '2024 Scheme'.
- 1.2.2 On 21st October 2025, Planning and Environment Decisions Wales (PEDW) elected to refuse the planning application for the 2024 Scheme. However, in doing so, the Officer Report for the 2024 Scheme acknowledged that there is significant weight on the economic benefits of the scheme and its contribution to renewable energy production supporting the transition to a low carbon future in a changing climate.



- 1.2.3 The planning application set out in this Planning Statement (hereafter known as the 'Resubmission Scheme') comprises the same application site, description of development and power generation as the 2024 Scheme, albeit with a reduction in the site area thus a decrease in solar panels proposed and a number of design improvements.

1.3 The Site and its Surroundings

- 1.3.1 The location of the Proposed Development is shown on Figure 1.1.
- 1.3.2 The Site, including the associated infrastructure, cable run, wildflower meadows and wildlife enhancement areas, covers approximately 200 ha, and is currently used for agriculture as part of several pastoral and arable agricultural holdings, with the focus being at Castle Farm. The proposed area within fencing that will contain panelling is limited to around 135 ha.
- 1.3.3 The Site is adjacent to the South Wales Main Line railway, approximately 4 km to the east of the city of Newport. The railway line forms the southern boundary to the Site, whilst to the north and northwest, the Site is bounded by agricultural fields and areas of woodland within Llanwern Park. To the east, the Site is again largely bounded by agricultural fields.
- 1.3.4 Whilst being used for agriculture and being of a rural nature, the Site is located within a heavily industrialised area of South Wales. To the south of the site, operations are ongoing at the Tata Steel Llanwern site. The western portion of the site is now redundant and being developed as part of the Newport Eastern Expansion Area at Glan Llyn, which will provide an additional urban environment. The eastern portion of the Tata Steel Llanwern site is still used for the rolling of steel.
- 1.3.5 To the east of the Site is Magor Brewery, currently operated by AB InBev, which produces over one billion pints of beer a year. There are plans to extend the site further, including the installation of hydrogen technology to power the site (DNS Reference: DNS CAS-01960-J2H3X5). The Magor Brewery is currently also powered by a single 150m tall wind turbine, located nearby, within the Gwent Levels.



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- 1.3.6 To the southeast of the Site is the Gwent Europark, a logistics hub that includes storage and distribution facilities for national retailers including Tesco and Wickes, with the Tesco distribution facility equipped with two wind turbines.
- 1.3.7 The village of Bishton is located south of the central area of the Proposed Development, with a buffer of existing field units to the west and a minimum 75 m buffer to the nearest houses on the east of the village.
- 1.3.8 The boundaries of the Site are generally formed by hedgerows and trees as part of recognised field boundaries within agricultural holdings. The southern boundary of the Site is made up of a combination of the South Wales Main Line, Bishton Road, and an unnamed road between Bishton and Wilcrick.
- 1.3.9 The Gwent Levels - Redwick and Llandeenny Site of Special Scientific Interest (SSSI) is located adjacent the Site within the south-eastern most area. The SSSI is 940 ha in total. Further details on this SSSI can be found in Chapter 6.0 of the ES.
- 1.3.10 The proposed cable route connects the Site to the Grid Supply Point (GSP) at Uskmouth Power Station. This is an approximate 10 km grid connection within the highway boundary. Towards the GSP at Uskmouth Power Station, the cable route would be located in the existing highway adjacent to and within the Gwent Levels - Nash and Goldclif SSSI and then adjacent to an approximate 200 m section of the Newport Wetlands SSSI.
- 1.3.11 No other statutory environmental designations are within the Site, though there are three scheduled monuments near to the Site. These are:
- i) Bishton Castle – located to the north of Bishton, adjacent to the Site boundary, and is the former location of a medieval castle or fortified house, with no ruins remaining.
 - ii) Wilcrick Hill Camp – located approximately 600 m to the east of the Site and is the location of a probable Iron Age Hillfort.
 - iii) Deserted Medieval Village – Located to the northwest of Wilcrick Hill Camp and is a collection of earthworks comprising four rectangular enclosures.



1.4 Structure of the Planning Statement

1.4.1 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 an overview of the planning history and previous submission;
- ii) Section 3.0 provides a detailed description of the Proposed Development;
- iii) Section 4.0 addresses the need for and benefits of the Proposed Development;
- iv) Section 5.0 sets out the planning policy context;
- v) Section 6.0 appraises the Proposed Development against the relevant policy; and
- vi) Section 7.0 provides a summary and draws a concise conclusion regarding the acceptability of the Proposed Development in planning terms



2.0 PLANNING HISTORY AND PREVIOUS SUBMISSION

2.1 Planning History

2.1.1 The Newport City Council online planning application map search facility ('MyNewport') has identified the following relevant planning history for the Site:

- i) 2024 Scheme- Land between the M4 Motorway and The South Wales Main Line Railway, Near Llanwern, Underwood and Bishton. Application Ref: DNS 3279787. Proposed Development comprising the Erection of a Solar Farm, Battery Storage Units, associated Infrastructure, Access Landscaping and Grid Connection. Refused 21/10/2025.
- ii) 22/0263-Uskmouth Power Station West Nash Road Nash Newport South Wales NP18 2BZ. Environmental Impact Assessment (EIA) Screening Opinion for the construction of a 230MW battery energy storage system (BESS)
- iii) 15/0424-Land North East Of Grey House Red House Lane Bishton Newport. Screening opinion for proposed photovoltaic farm and associated works. Environmental Statement not required. 13/05/2015.
- iv) 15/0725- Castle Farm Bishton Road Bishton Newport NP18 2DZ. Erection of 0.8MW wind turbine of 66 metres in height (to blade tip) and ancillary equipment and associated infrastructure (affecting public right of way 388/20 Bishton and 388/18 Bishton) (resubmission of application 14/0713).

2.2 Previous Submission

2024 Scheme

2.2.1 As set out above, the 2024 Scheme comprised a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers DNS 3279787. This occupied the identical site as this Resubmission Scheme. The scheme involves the installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with substation, switchgear container, inverter/transformer units, Site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.



Pre-application Consultation and Engagement

- 2.2.2 Newport City Council are the Planning Authority to which the application for the Proposed Development would have been made had it not been submitted to Planning and Environment Decisions Wales (PEDW). As such, it is important to engage with the LPA as it plays an important role in procedural aspects of the DNS process, such as EIA scoping, and was required to submit a Local Impact Report in response to formal consultation.
- 2.2.3 The Planning Authority were first contacted on 25 October 2021 with relevant information in order to provide pre-application advice for the proposed developments. The Planning Authority responded on 25 January 2022, providing a preliminary assessment of the Proposed Development including an indication of the main issues that should be addressed should an application be made.
- 2.2.4 In summary the key environmental issues raised were:
- i) Flood Risk – It should be noted that the site is partly within areas vulnerable to flooding and that it will be necessary to demonstrate that the Proposed Development passes the justification tests outlined in TAN 15.
 - ii) Biodiversity – Baseline surveys will be key in understanding how biodiversity interests will be affected. It should be established whether there are any links to European sites in the Seven Estuary. Protected species should be considered in line with recorded data obtained from South East Wales Biodiversity Records Centre (SEWBRc). Potential species to be considered are also highlighted, along with the importance of considering the ecosystems within which these species inhabit. It will be important to demonstrate a net benefit for biodiversity.
 - iii) Landscape and Visual – Potential impacts of the Proposed Development should not be underplayed and should address adjacent, mid-distance and longer distance impacts. The number of viewpoints should be expanded to include a broader range of views. The consideration of cumulative visual amenity impacts will also be key for the assessment.
 - iv) Agricultural Land – It is noted that the Proposed Development is not likely to be on Best and Most Versatile Agricultural Land (BMVAL). The reversibility of the Proposed Development should be demonstrated.



- v) Woodland / Hedges – A large area of the site will be bordered by woodland on hedgerows and large specimen trees are present. These should be accommodated within the design. Any felling, lopping or topping would not be supported.
- vi) Public Rights of Way (PRoW) – The regard to existing PRoW appears positive, though effective management needs to be secured to ensure PRoW do not become overgrown. Opportunities for PRoW enhancement should be explored.
- vii) Cultural Heritage – Part of the Site is located within an Archaeologically Sensitive Area so there is a strong likelihood of preserved archaeology. The Proposed Development may have an impact on the Llanwern Park Historic Park and Garden, and Bishton Castle Scheduled Monument.
- viii) Noise – The generally rural noise environment, noting the presence of the South Wales Main Line railway and major industrial development, and detailed design should ensure that fixed plant meets appropriate noise standards in relation to nearby dwellings.
- ix) Glint and Glare – Advised that a Glint and Glare assessment should be undertaken in terms of visual impact and impacts on the South Wales Main Line railway and aircraft.
- x) Minerals – It is noted that parts of the Site are located within Mineral Safeguarding Areas. The Proposed Development should not inhibit future extraction within the timescales of likely demand.
- xi) Construction Traffic – Stated that highways impacts may be reduced by identifying accessible lay down areas and using on site haul roads. A Construction Traffic Management Plan (CTMP) will be required.

The Planning Inspectorate Wales / PEDW

2.2.5 Early engagement was undertaken with PEDW to ascertain a without prejudice view of the emerging development and proposed assessment:

- i) Meeting of Tuesday 27 July 2021 – An overview of the Proposed Development was provided by the applicant with initial discussions on potential constraints, survey work and consenting options for the proposed cable route to the Severn Power Station at Uskmouth. Information regarding potential cumulative developments was also provided to the applicant.



- ii) Meeting of 29 November 2022 – Meeting ahead of submission of the EIA Scoping Report to update PEDW of progress to date and future time lines. The proposed scope of the EIA was presented, with a subsequent discussion regarding the content of the ES and the need for any secondary consents.
- iii) EIA Scoping – The EIA scoping Report was submitted to PEDW on 22 December 2022. A formal Scoping Direction was received from PEDW on 25 May 2023 which outlined where there was agreement with the applicant's Scoping Report and where certain other aspects were required to be included within the EIA process. The Scoping Direction also included the comments of statutory consultation bodies as defined by Regulation 2(1) of the EIA Regulations.

Informal Public Consultation

- 2.2.6 The Applicant launched an informal public consultation for the Craig y Perthi Solar Farm on the 1 December 2022. The consultation sought the views of those who live and work in the surrounding area to inform them of the emerging proposals and to obtain feedback that would inform the ongoing design process.
- 2.2.7 The consultation was open from the 1 December 2022 to the 27 January 2023, with a public exhibition held on the 15 December 2022 in Bishton village.
- 2.2.8 In total, the Applicant received:
 - i) 65 people attending the public event.
 - i) 14 written feedback forms.
 - ii) 21 email responses.
 - iii) 5 written letters (of which 2 represented individuals and 3 represented groups).
- 2.2.9 The findings of the key questions asked at the informal consultation can be summarised as:
 - i) The majority of respondents were local.
 - ii) There was agreement that climate change and energy security are important issues, and that the UK needs more renewable energy and energy storage.
 - iii) The majority of those who responded stated that the retention of agricultural land and improved visual screening were important aspects of the proposals.



- iv) Peoples changing views over the past 2 years regarding solar energy are polarised.
- v) There was agreement that solar energy could increase solar energy and reduce electricity bills.
- vi) More than 50% of respondents supported the plans to create new green infrastructure and community funding.
- vii) Support for the project was evenly split.

Pre-Application Consultation

- 2.2.10 The Applicant undertook formal Pre-Application Consultation exercise from 17 July to 11 September 2023 which ran for 57 days exceeding the 42 minimum requirement set out in the Developments of National Significance (Procedure) (Wales) Order 2016 ('DNSPWO'). The Applicant displayed site notices on or near the land to which the proposed application related for this time period. Written notices were issued to all statutory consultees, including adjacent landowners.
- 2.2.11 As required in the DNSPWO, a notice was published in a locally circulating newspaper on 17 July 2023. The Notice appeared on page 32 of the South Wales Argus which has a circulation that covers the site and surrounding areas. All relevant and required documents were uploaded to the website and available to view or download from the beginning of the statutory consultation period (17 July 2023).
- 2.2.12 A website was developed and updated for the statutory consultation period. Other public consultation material included residential and stakeholder letters which were sent within an appropriate target area, advertisement in local newspapers and face to face public exhibitions.
- 2.2.13 Feedback through the statutory consultation period was received through the project website, feedback forms, post, email, telephone and direct feedback as a result of the discussions undertaken at the public exhibitions.

Reasons for Refusal

- 2.2.14 PEDW Welsh Minitors refused the 2024 Scheme for the following reasons:



Reason 1: The Effect on Landscape Character and Visual Amenity of the Area

- 2.2.15 The Inspector finds that the Environmental Statement's Landscape and Visual Impact Assessment identifies significant landscape and visual effects, despite concluding that overall landscape character would not be dramatically altered. Part of the site lies within HLCA009 Green Moor, a well-preserved historic landscape that contributes to the wider Gwent Levels.
- 2.2.16 The Inspector questions the ES's classification of harm as Moderate Adverse, noting that both Cadw and the Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL) assessment consider the impact to be Major/Severe, and ultimately accepts that the harm is significant in EIA terms. Proposed mitigation measures are regarded as uncertain and potentially insufficient, and interpretative measures would not offset the scale or 40-year duration of harm.
- 2.2.17 Overall, the Inspector concludes the development would cause significant, locally harmful impacts on the historic landscape that could not be adequately mitigated or compensated.

Reason 2: Visual Impact

- 2.2.18 The Inspector concludes that the proposed solar development would cause significant and unacceptable landscape and visual harm, particularly to the village of Bishton and users of nearby public rights of way. Although the Environmental Statement acknowledged moderate adverse effects, the Inspector found the impact would be greater, with the solar arrays visually enclosing Bishton and introducing a dominant, engineered presence into an otherwise rural landscape. Mitigation planting was considered insufficient to address the scale, height, and uniformity of the panels, and could itself harm valued open views. Recreational users would experience a more confined and visually oppressive environment, reducing enjoyment and tranquillity.
- 2.2.19 While cumulative impacts were not considered significant, the direct landscape and visual effects were judged to be significant adverse impacts that could not be satisfactorily mitigated, resulting in conflict with development plan policies and Planning Policy Wales.



Reason 3: The Effect on Ecology

- 2.2.20 Part of the site lies within the Gwent Levels – Redwick and Llandeenny SSSI, where ecological interest depends on maintaining water quality, water levels, and the drainage system. NRW advises that any harm to these factors could damage the SSSI's designated features, including the Shrill Carder Bee which is a key feature of the SSSI.
- 2.2.21 The Inspector notes that several protected bird species use the site, though most are of local importance. Particular concern is raised for Lapwing, a red-listed species with a declining local population. While a 12-hectare mitigation area is proposed, NRW and others question whether this would be sufficient to compensate for the loss of arable and open pasture habitat or to support population recovery.
- 2.2.22 The Inspector concludes there is uncertainty that the mitigation would even fully compensate for habitat loss, let alone deliver the level of enhancement required under the Section 6 duty of the Environment (Wales) Act

Reason 4: The Effect on the Setting of Historic Assets in the Locality

- 2.2.23 The Inspector disagrees with the assessment for two listed churches—St Mary, Llanwern (Grade II*) and St Cadwaladr, Bishton (Grade II). The Inspector finds that the development would harm the settings of both churches, severing their visual and historic relationship with the surrounding open landscape. Proposed planting and wildflower mitigation is considered insufficient and uncharacteristic, with solar panels dominating key views and diminishing the churches' prominence. The unmitigated harm to the settings of the listed churches conflicts with development plan policies and Planning Policy Wales.

Resubmission Scheme

- 2.2.24 The Resubmission scheme addresses the reasons for refusal of the 2024 Scheme in Section 6.0 of this Planning Statement; specifically, sections 6.3 Landscape and Visual Effects, 6.4 Ecology and 6.5 Heritage and Archaeology, with all these points brought together in Section 7.0 (Conclusion).



2.3 The Applicant

- 2.3.1 The Applicant is part of the largest power producer in Wales, with over 1 GW of renewable energy generation, around a quarter of Wales' total renewable energy production. The Applicant operates out of its dedicated offices in Baglan, Port of Mostyn and Dolgarrog, directly employing over 300 people, with around 100 renewable energy apprentices in training through its partnership with Coleg Llandrillo. They place a special focus on engaging and working closely with local communities who in turn help to shape their developments, with over £21m already invested through dedicated community funds in Wales. In addition to their focus on supporting local communities, improving local biodiversity of their solar sites is another key priority, with a commitment to create a minimum biodiversity net gain of over 50% on every new solar scheme, 5x the industry standard.



3.0 THE PROPOSED DEVELOPMENT

3.1 Introduction

- 3.1.1 The Applicant is seeking planning consent for the installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays with associated infrastructure including substation, switchgear container, inverter/transformer units, Site access, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements. This solar photovoltaic electricity generating station (or 'solar farm') would have an export capacity of approximately 99.9 MW.
- 3.1.1 The electricity generated and exported would be enough to provide electricity for approximately 45,374 typical Welsh homes² and result in an approximate saving of 3,180,368 tonnes of CO₂ over the life of the development, compared with generation from fossil fuels. The inclusion of batteries ensures the maximum efficiency of the Site, working with the electricity distribution system to enable surplus energy to be stored and released as needed, and provide vital balancing services to the grid network.
- 3.1.2 The main components of the Proposed Development are:
- i) Photovoltaic solar panels and associated support frames.
 - ii) Central Inverter Stations.
 - iii) An onsite 132 kv substation.
 - iv) A switchgear building.
 - v) Approximately 4.9 km of improved footpaths/green lanes, enhancing Public Rights of Way through the site.
 - vi) Approximately 3.3 km of new permissive path walkways.
 - vii) Wooden post deer/stock fencing.
 - viii) In-ward facing infrared CCTV cameras on 3 m poles.

² Subnational Electricity and Gas Consumption Statistics Regional and Local Authority, Great Britain, 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1126284/subnational_electricity_and_gas_consumption_summary_report_2021.pdf



- ix) Ecological enhancements including bee hotels, reptile hibernacula, bird boxes, insect hotels, log piles, wildflower meadows enhanced for shrill carder bees, and a dedicated enhanced habitat for lapwing.
 - x) Over 11 km of new native species hedgerow / tree planting, with existing hedgerows filled in / improved.
 - xi) Areas of native species woodland planting and creation of a community orchard.
- 3.1.3 Solar panels typically cover (or 'over sail') between 25% and 40% of the land which they occupy and are mounted on frames. The solar panels would be arranged over the Site in a series of rows approximately 4-10 m apart. The solar panels would sit at a maximum height of 3 m, when tilted southwards at an angle of 15-30 degrees. The panels would be situated at least 5 m from any field boundaries and 7 m from any perimeter deer fencing. This offsetting would be 12 m from any reens and 7 m from ordinary watercourses around or adjacent to the Site.
- 3.1.4 No significant groundworks would be required to install the solar frames as they are fitted using 'press-in' piles, driven into the ground. This method has a lesser impact than 'impact' piling, in terms of construction noise.
- 3.1.5 The Proposed Development would include a 132 kV substation, which would comprise an open compound with support stanchions and cabling. The substation would sit to the southwest of the Site and, importantly, would be located away from the village of Bishton to reduce safety risk or the potential for unauthorised access. The substation's main structural elements would be painted in a warm, muted mid-tone neutral shade to ensure that they are visually recessive within the landscape.
- 3.1.6 It is anticipated that the substation would sit within an approximate 67 m x 76 m compound comprising hardstanding and enclosed within a 2.4 m weldmesh security fence (likely green in colour). A Switchroom and Control Centre building would be located adjacent to the Substation building within the compound.
- 3.1.7 The solar farm site would be enclosed by 2 m 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.



Wildlife enhancement area

- 3.1.8 An area within the southeast of the Site, measuring approximately 12 ha, is proposed as a biodiversity/wildlife enhancement area. New planting would be introduced here, and the area would be managed to provide new habitat for Lapwings, as well as delivering a net benefit for biodiversity for the Proposed Development.

Grid Connection

- 3.1.9 The point of connection to the National Grid would be the substation to the west of the Severn Power Station at Uskmouth, approximately 6.5 km to the southwest of the Site. The Site would connect to the substation via an underground electrical cable. The grid connection route would be approximately 10 km. For the majority of this route, the underground cable would sit beneath the existing highways boundary, as shown on the Location Plan (Figure 1.1).

Dual Use and Reversibility

- 3.1.10 The layout of the solar farm would allow for sheep and poultry grazing beneath and between the rows of panels, providing an efficient dual use of land for renewable energy generation and livestock. The Proposed Development would have a design lifespan of 40 years. This is considered a temporary (albeit long term) and fully reversible use, as, with the exception of the on-site sub-station and associated access track, all equipment, shallow hardstanding surfaces and fixings would be removed from Site upon decommissioning.
- 3.1.11 The methods used in construction are such that remediation/decommissioning works following the removal of the solar panels and associated infrastructure would be relatively easy to achieve. As such, the Site could be returned to its existing state as agricultural land.



4.0 THE NEED FOR A SOLAR FARM

4.1 Introduction

4.1.1 This Section of the Planning Statement identifies the ‘need’ for solar farm provision in Newport. It is divided into four principal subsections under the following headings:

- i) Subsection 3.2: International Context for solar farms;
- ii) Subsection 3.3: National Context for solar farms;
- iii) Subsection 3.4: The Need for a solar farm; and
- iv) Subsection 3.5: Alternative Sites.

4.2 International Context

4.2.1 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.

4.2.2 The Kyoto Protocol was signed in 1997, running from 2005 to 2020, and was the first implementation of measures under the United Nations Framework Convention on Climate Change (UNFCCC). The Kyoto Protocol was subsequently superseded by the Paris Agreement which entered into force in 2016. It is regulated by the Conference of the Parties (COP) which meets annually to assess progress in dealing with climate change. One of the key outcomes of the latest conference, COP30, included reaffirming the COP28 goal to triple global renewable energy capacity by 2030.



4.3 National Context

Clean Power Action Plan 2030 (2024)

- 4.3.1 The Government's Clean Power 2030 Action Plan³ 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.
- 4.3.2 The Clean Power 2030 Action Plan also emphasises that solar energy is one of the quickest and most scalable technologies to deploy, allowing large volumes of clean electricity to be added to the grid in relatively short timeframes compared to other infrastructure. By harnessing sunlight, an abundant and free resource, solar farms reduce reliance on fossil fuels, helping to cut greenhouse gas emissions and improve energy security. Their flexibility also allows them to be developed across a range of sites, including lower-grade agricultural land and alongside existing infrastructure, while contributing to a more decentralised and resilient energy system. As part of the broader transition to net zero, the expansion of solar farms will therefore be instrumental in meeting the UK's clean power targets by 2030.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 4.3.3 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 <https://assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf>



- 4.3.4 On 12 June 2019, the Government laid the draft Climate Change Act 2008 (2050 Target Amendment) Order 2019 to amend the Climate Change Act 2008 by introducing a target for at least a 100% reduction of greenhouse gas emissions (compared to 1990 levels) in the UK by 2050. This is otherwise known as the net zero target. The draft order amended the 2050 greenhouse gas emissions reduction target in the Climate Change Act from at least 80% to at least 100% thereby constituting a legally binding commitment to end the UK's contribution to climate change.
- 4.3.5 At the time the legislation was enacted the UK had already reduced emissions by 42% while growing the economy by 72%. However, the new target requires a significant increase in renewable energy, development of carbon capture and storage technology, construction of new nuclear generation, and a transition to hydrogen and electric for heating and transport.
- 4.3.6 On 20 April 2021 the UK government announced that it would set in law a more ambitious target of cutting carbon emissions by 78% by 2035 compared to 1990 levels. This was in response to the UK's Sixth Carbon Budget from the Climate Change Committee (see below) and signals the Government's acceptance of the recommendations and commitment to carbon emission reductions.
- 4.3.7 It is clear from the Government's legally binding commitment to net zero by 2050 and recent announcement that significant new investment will be required in renewable energy projects across the UK to deliver these ambitious objectives.
- 4.3.8 The Proposed Development would help deliver on the Government's legally binding target and would support the green economy. This should be given considerable weight in the planning balance when considering possible policy tensions. Recent volatility in the UK energy markets has highlighted the importance of the UK generating its own domestic supply of clean low carbon electricity and reducing reliance on imported fossil fuels.



Net Zero Strategy: Build Back Greener (2021)

- 4.3.9 The Government published the 'Net-Zero Strategy: Build Back Greener' in October 2021⁴. The Strategy sets out policies and proposals for decarbonising all sectors of the UK economy to meet the net-zero target and keep us on track for future carbon budgets.
- 4.3.10 In terms of policies and proposals for power, Chapter 3i 'Reducing Emissions across the Economy - Power' sets out on pages 94 and 95 that, subject to security of supply, government's commitment to a fully decarbonised power system will be brought forward to 2035. It also seeks to accelerate deployment of low-cost renewable generation, such as wind and solar, and to ensure that the planning system supports the deployment of low carbon energy infrastructure.
- 4.3.11 Decarbonising the power sector forms the foundation of a productive net zero economy and needs to meet a 40-60% increase in demand by 2035. The strategy also identifies that this will regenerate communities and create new employment opportunities right around the UK (paragraph 20, page 99)
- 4.3.12 The strategy recognises that decarbonising gas heating is likely to take longer than decarbonising the electricity system and as such heat pumps and a high electrification scenario, as per National Grid's future energy, is the most likely scenario to 2035. Paragraph 18 on page 141 states that:
- "The increased deployment of heat pumps will be accompanied by investment in the infrastructure we need to meet increased electricity demand, including the generation of low carbon electricity and additional grid capacity".*
- 4.3.13 This acknowledgement increased the weight that should be given to the wider environmental benefits of renewable energy and the security of supply that would be delivered by the Proposed Development.

⁴ [net-zero-strategy-beis.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98765/net-zero-strategy-beis.pdf)



Government response to the Committee on Climate Change 2025 Progress Report

- 4.3.14 The Government published their response to the Committee on Climate Change (CCC) Progress Report⁷ (June 2025) in October 2025. The Government agrees with the CCC that rapid expansion of low-carbon electricity is the single most important enabler of Net Zero, underpinning decarbonisation of heat, transport and industry. It presents clean power as an economic and energy-security priority, not just a climate one.
- 4.3.15 The Government reaffirms its commitment to delivering clean power by 2030, meaning the electricity system would be largely decarbonised by the end of the decade. It explicitly accepts the CCC's view that delivery, not long-term targets, is now the limiting factor, and that action in the 2020s is critical. Solar is recognised as a fast-deploying, low-cost technology, essential to meeting clean power goals and accepting that planning processes and grid delays, rather than technology costs, are now the main constraints.

Clean Growth Strategy (2017)

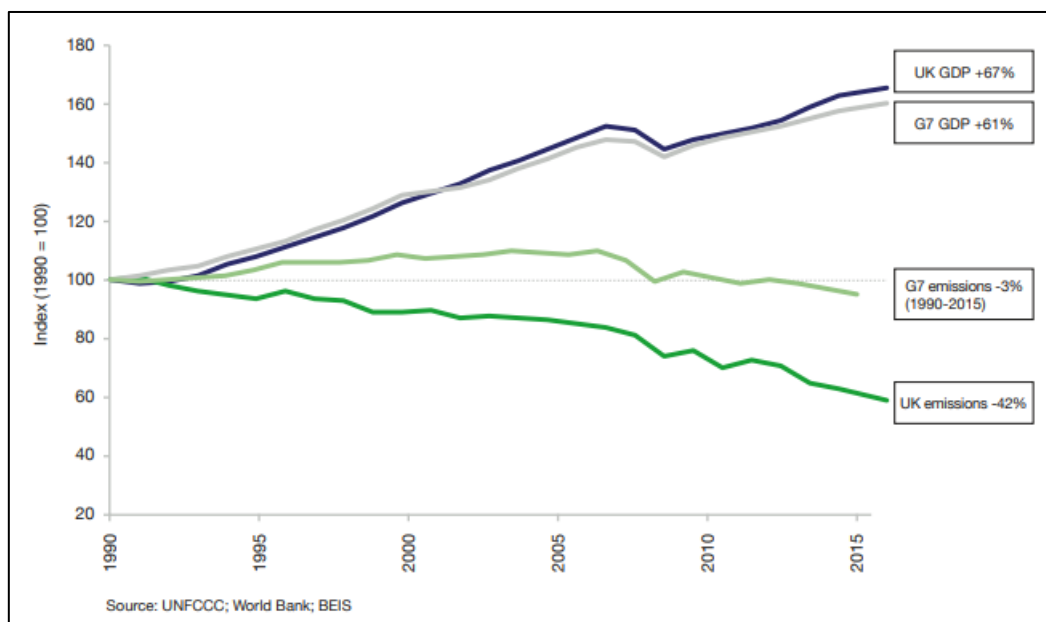
- 4.3.16 The Clean Growth Strategy⁸ was originally published by BEIS in October 2017 and was updated in April 2018. The updated executive summary highlights that the UK has reduced emissions by 42% whilst growing the economy by two-thirds. This means the UK has reduced emissions faster than any other G7 nation. This is illustrated in Chart 3.1 below.

⁷ <https://assets.publishing.service.gov.uk/media/69010a44afec1781f77994fb/climate-change-committee-progress-report-2025-government-response.pdf>

⁸ [Clean Growth Strategy \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/media/69010a44afec1781f77994fb/clean-growth-strategy.pdf)



Chart 3.1: UK and G7 Economic Growth and Emissions Reductions



4.3.17 In 2016, 47% of UK electricity came from low carbon sources, around double the level in 2010. This progress has been aided by the falling costs of many low carbon technologies, such as solar and wind which can now be delivered without subsidy, if appropriately scaled to ensure commercial viability.

4.3.18 The updated executive summary goes on to state that:

“In order to meet the fourth and fifth carbon budgets (covering the periods 2023 to 2027 and 2028 to 2032) we will need to drive a significant acceleration in the pace of decarbonisation and in this strategy we have set out stretching domestic policies that keep us on track to meet our carbon budgets” (emphasis added)

4.3.19 To further drive down emissions throughout the next decade the Strategy sets out several policies and proposals. In respect of the power sector, the Strategy anticipates that by 2050 emissions from the power sector need to be close to zero. This position is reinforced by the Climate Change Act 2008 (2050 Target Amendment) Order 2019, referenced above.

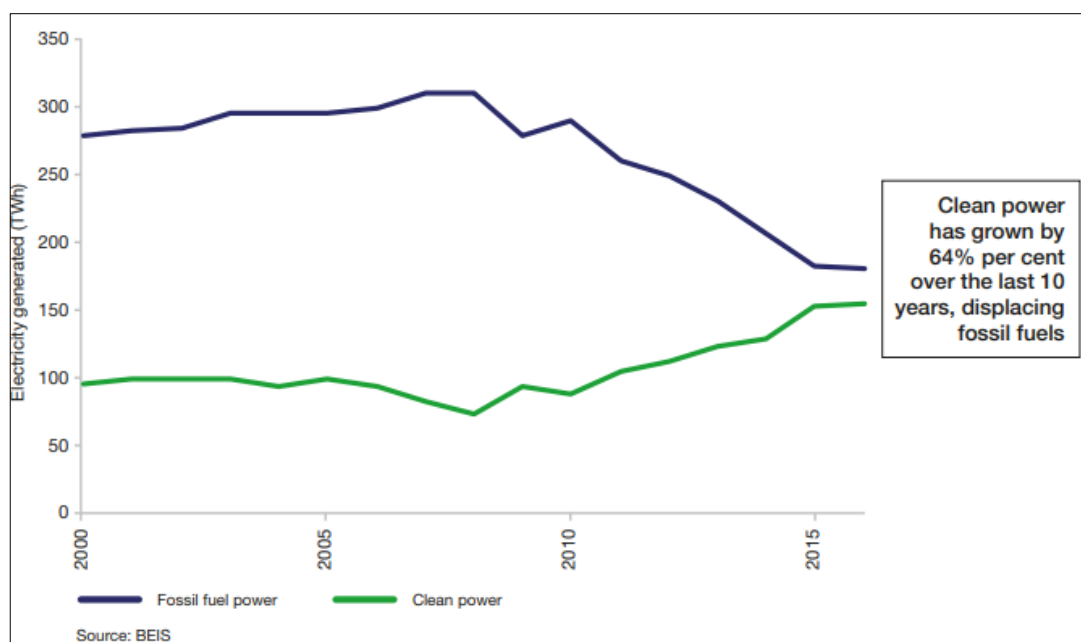
4.3.20 The Strategy sets out in ‘Delivering Clean, Smart, Flexible Power’ that (as of 2016):

“Power sector emissions have fallen 49 per cent since 1990 as we have switched from coal to gas and renewable power such as wind and solar, with biomass

conversions also playing an important transitional role, alongside improvements in the efficiency of our economy. Last year, 47 per cent of our electricity came from low carbon sources, with the rest mainly coming from coal and gas”.

- 4.3.21 Figure 23 of the Strategy illustrates that in 2016 clean power was approaching parity with fossil fuels. This is replicated in Chart 3.2 below. To achieve the revised 2050 Climate Change Act target of net zero this trend needs to be maintained by further investment in clean power sources, such as the Proposed Development.

Chart 3.2: UK electricity generation by fuel type, 2000-2016



- 4.3.22 The Strategy sets out that the Government wants “...a diverse electricity system that supplies our homes and businesses with secure, affordable and clean power. That means developing low carbon sources of electricity that are both cheap and clean, taking into account wider system impacts for all sources of generation” (emphasis added). The Strategy goes on to state that “this could be achieved by growing low carbon sources such as renewables and nuclear to over 80 per cent of electricity generation, and phasing out unabated coal power”. (emphasis added).
- 4.3.23 Since 2016 this drive for clean power has been maintained and in 2019 clean power exceeded fossil fuels for the first time. Unabated coal power dropped from about 75% in the 1990s to just 2.1 % in 2019. The Government proposal is to end unabated

coal by 2024 and this will need to be replaced by renewable and low carbon power sources, such as the Proposed Development as a matter of urgency.

- 4.3.24 Despite this initial success the UK still needs considerable and urgent investment in the clean power sector to deliver net zero by 2050. Solar PV can provide a significant contribution to delivering this legally binding target, whilst maintaining economic growth.

Carbon Budgets and the Seventh Carbon Budget

- 4.3.25 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.
- 4.3.26 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.
- 4.3.27 The Sixth Carbon Budget 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.
- 4.3.28 In 2025, the Government published the proposed Seventh Carbon Budget 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.
- 4.3.29 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



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)

- 4.3.30 The British Energy Security Strategy¹⁰ 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.
- 4.3.31 The strategy signals a significant investment in new nuclear power and significant increases in hydrogen production and usage. In addition, significant increases in the deployment of wind and solar generation are included in the strategy.
- 4.3.32 The ambitions for a significant increase in new nuclear and hydrogen production/usage are long term planks in the energy strategy, with new nuclear and a significant shift to hydrogen usage for transport, heating, and other usage likely to take a number of decades to come to fruition.
- 4.3.33 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.
- 4.3.34 There is currently approximately 14GW of solar generation capacity in the UK and the British Energy Security Strategy aims to increase this five-fold to 70GW by 2035. Over the last five-year period, the UK increased its solar capacity by an estimated 1.8GW, highlighting the need for a significant increase in solar development if the strategy's targets are to be fulfilled.
- 4.3.35 The Strategy offers clear support for solar development that is co-located with other functions to maximise the efficiency of land use – this includes agriculture and storage.

¹⁰ [British energy security strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106521/bess-2022.pdf)



National Grid Future Energy Scenarios (2025)

- 4.3.36 The National Grid ESO was the electricity system operator for Great Britain. From 1 October 2024, Great Britain's energy system has been in public ownership (following the sale of the National Grid ESO to the Government) and is overseen by the newly formed 'National Energy System Operator' (NESO)¹⁴.
- 4.3.37 Prior to its sale to the Government, the National Grid ESO owned and operated the electricity transmission infrastructure and ensured power demand was balanced with the supply of electricity across Great Britain, on a second by second, real time basis. By way of example, if there is a sudden dip in energy production that coincides with a period of high demand, there is a risk that faults could occur on the transmission or distribution networks causing extensive power outages and /or damage to the network.
- 4.3.38 To ensure that the National Grid ESO planned for long term changes to the energy market and to respond to Government policy and strategy, annual reports were produced to consider future energy scenarios.
- 4.3.39 The latest version of the 'Future Energy Scenarios' (FES) was published in November 2025 (2025 FES), and it highlights that the critical enablers for success fall within four main areas:
- Energy efficiency - Energy efficiency can help manage demand growth and will reduce the cost of energy for consumers. Policy and innovation can enable efficiency improvements and adoption of measures across all sectors.
 - Demand flexibility - Greater levels of flexibility offer greater opportunities to make more efficient use of low cost renewable energy. Supply side flexibility provides most of today's flexibility and, while this must continue to grow, complementing this by increasing consumer flexibility can reduce the cost of

¹⁴ [*Designation of the National Energy System Operator \(NESO\) \(DESNZ, 2024\)*](#)

other forms of flexibility, put consumers in control of their energy use and reduce their energy costs.

- Infrastructure and energy supply - Delivering energy security and resilience relies upon an expansion in infrastructure. Helping communities understand how they can directly benefit from clean energy, while recognising the impact of new infrastructure, will help support delivery of this at the necessary pace.
- Switching to low carbon technologies - Adoption of low carbon technologies will play a vital role in the transition. Great Britain is an engineering powerhouse and harnessing this potential can enable development of electrification, carbon capture and low carbon fuels technologies.

4.3.40 Pathways consider the different ways Great Britain can reach a net zero energy system and interim emissions reductions along the way. They explore the choices and uncertainty ahead in areas such as the speed of technology uptake, the role of both electrification and low carbon fuels and the level of consumer engagement. Four pathways are considered to achieve net zero by 2050:

- Holistic transition - This assumes meeting of net zero target through a mix of electrification and hydrogen.
- Electric engagement – Net zero is met through electrified demand, Consumers engaged and use smart technologies that reduce energy demand.
- Hydrogen evolution – fast progress for hydrogen for industry and heating. Many consumers will have hydrogen boilers, with uptake for hydrogen for heavy goods vehicles but electric vehicle uptake is still strong.
- Falling Behind – Decarbonisation progress is made but the net zero targets are not met. Consideration is given to full potential demand for reliance on unabated fossil fuels.

4.3.41 All pathways assume a mix of technologies is required to meet energy demand.



- 4.3.42 Rapid and deep decarbonisation is required across all sectors starting now if we are to achieve carbon budgets and Nationally Determined Contributions (NDCs).
- 4.3.43 The Sixth Carbon Budget was the first carbon budget set with the net zero target in sight and the first to be set following the 2019 amendment to the Climate Change Act. This updated the 80% target to one of net zero greenhouse gas emissions in 2050. Holistic Transition and Electric Engagement both achieve the Sixth Carbon Budget. Deep decarbonisation efforts are needed now across all sectors to achieve this and to make headway towards the recommended Seventh Carbon Budget.
- 4.3.44 As with FES 2024, Holistic Transition is the only pathway achieving the 2030 NDC. Both Electric Engagement and Hydrogen Evolution miss this target by 12 MtCO₂e.
- 4.3.45 FES 2025 acknowledges that all pathways see significant growth of solar deployment over the next 25 years up to the 2050 target to achieve net-zero emissions, as shown below in chart 3.3 and table 3.1.

Chart 3.3: Solar capacity by scenario

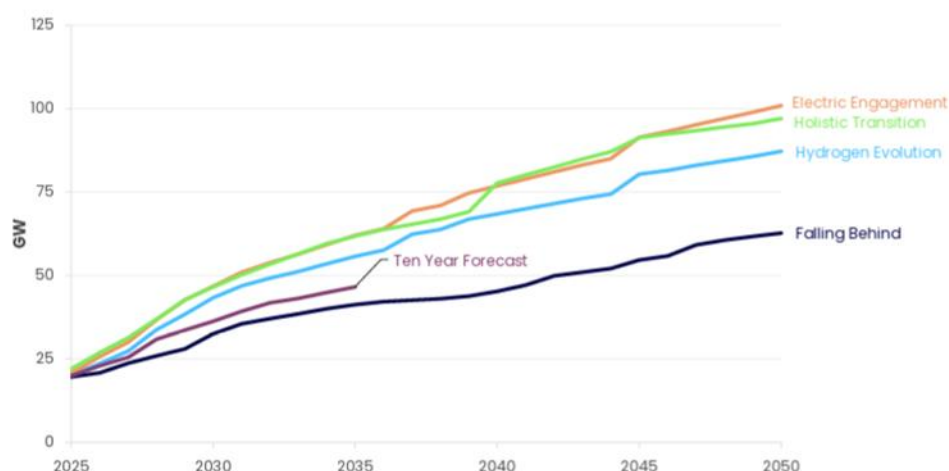


Table 3.1: Forecast Electricity Supply from Solar Generation using Pathways

Modelling Assumptions	Holistic Transition	Electric Engagement	Hydrogen Evolution	10 Year Forecast	Falling Behind
Queue to 2030 (including built capacity)*	71.5GW				
Max load factor in 2050	12%				
Total solar capacity in 2030	46.7GW	46.8 GW	43.3 GW	36.3 GW	32.6 GW
Total solar capacity in 2050	97.0 GW	101.0 GW	87.2 GW	N/A	62.8 GW

*Data as of December 2024

- 4.3.46 Solar transmission is expected to grow in the next few years, driven by planning approval of (standalone) large-scale solar farms and the Clean Power 2030 commitment. Primary solar generation (excluding storage) builds across all three of the net zero pathways in the 2020s to meet increasing demand and to offset the use of high carbon generation, while helping to achieve emissions targets.

State of Natural Resources Report for Wales (2020)

- 4.3.47 The second State of Natural Resources Report¹⁵ (SoNaRR) was published in 2020 as required under the Welsh Environment Act 2016. The report builds on a number of Welsh, UK and global assessments of the status and trends of natural resources. It looks at risks that are currently posed to the ecosystems and to the long-term social, cultural, and economic well-being of Wales, as set out in the Well-being of Future Generations (Wales) Act 2015.
- 4.3.48 One of the key messages of the SoNaRR is that the global energy system is one of the main drivers of the climate emergency, and that the transition to renewable energy sources is both vital and inevitable for sustainable development. It emphasises that the consistent availability of renewable energy is a central goal of sustainable energy concepts, alongside energy efficiency and sufficiency.

¹⁵ [Natural Resources Wales / State of Natural Resources Report \(SoNaRR\) for Wales 2020](#)

Prosperity for All: A Low Carbon Wales (2019)

- 4.3.49 Prosperity for All: A Low Carbon Wales report¹⁶ sets the foundations for Wales to transition to a low carbon nation and sets out the action required to take 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*”.

National Policy Statements

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

- 4.3.50 The Overarching National Policy Statement for Energy (EN-1)¹⁷ was revised in January 2024 and is applicable to Wales insofar that certain decision making remains the responsibility of the Secretary of State, and that as energy policy is generally a matter reserved for UK Ministers, the National Policy Statement may be a relevant consideration in planning decisions in Wales.

- 4.3.51 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

¹⁶ [low-carbon-delivery-plan_1.pdf \(gov.wales\)](#)

¹⁷ <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>



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)

4.3.52 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).*

4.3.53 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).

4.4 Local Need

- 4.4.1 Locally, Newport City Council declared an Ecological and Climate Emergency on 23rd November 2021¹⁸, and made a commitment to try and reach net zero in their own operations by 2030. This follows the Welsh Government’s climate emergency declaration earlier in 2019¹⁹. This demonstrates Wales’ and NCC’s awareness of the global climate emergency and the willingness to act to tackle climate change.
- 4.4.2 Government data for electricity use within Newport City Council²⁰ shows that in 2021 (latest available data), Newport used a total of 220 GWh of electricity, based on sales of electricity made to domestic customers, and since 2016, the average annual electricity consumption per household has been increasing. The Proposed Development will make a significant contribution to meeting the increase in demand in electricity within Newport.
- 4.4.3 The Government has also collated data²¹ on the renewable electricity generation of each local authority area in the UK. Less than a quarter of Newport’s total renewable energy generation was attributed to solar, despite Llanwern Solar Farm resulting in the largest increase energy generation across all renewable technologies between 2020 and 2021. Furthermore, the Annual Monitoring Report 2022²² for Newport illustrates a significant downward trend in greenhouse gas emissions since 2005, which would be accelerated by the Proposed Development.
- 4.4.4 In March 2022, Newport City Council published the Newport’s Local Area Energy Plan (LAEP).²³ The vision stated in the LAEP was to:

¹⁸ [Newport declares ecological and climate emergency](#)

¹⁹ [Welsh Government makes climate emergency declaration | GOV.WALES](#)

²⁰ [Table | Domestic energy consumption | Environment | Environment and sustainability | Data | Home - InfoBaseCymru](#)

²¹ [Energy Trends: UK renewables - GOV.UK \(www.gov.uk\)](#)

²² [Annual Monitoring Report October 2022 ENG \(newport.gov.uk\)](#)

²³ <https://www.newport.gov.uk/documents/Reports/Newport-Local-Area-Energy-Plan.pdf>

“Develop a net zero energy system for Newport, as a city on the rise.”

4.4.5 In order to achieve this vision, Newport City Council identified key objectives that would help support this:

- i) To maximise reductions in carbon emissions while minimising financial costs.
- ii) To provide a resilient energy system capable of meeting future energy demand.
- iii) To empower the local economy, through increasing access to local employment and promoting local ownership and supply chains.
- iv) To support the creation of quality and long-lasting local job opportunities.
- v) To provide community engagement, leadership, and ownership.
- vi) To deliver affordable solutions for all.

4.4.6 The development of onshore renewables is one of 7 priority intervention areas identified within the LAEP, which states: *“Scaling up of onshore renewables is an essential component of meeting Newport’s future energy demand.”* The LAEP continues that ground PV is the least expensive (for of renewable energy) to deliver and that 958 MW of ground and rooftop PV is needed to achieve local net zero ambitions in line with national targets by 2050, with an additional 140 MW required by 2035.

4.4.7 As such, there is a clear need for renewable energy development in Newport, for Newport City Council to achieve its ambitions in relation to the climate emergency, energy security and local decarbonisation.

4.5 Alternative Sites Assessment

4.5.1 The Applicant has undertaken an Alternative Sites Assessment which is provided as Appendix 3.1 to this Planning Statement. The purpose of this assessment, having established ‘need’ in the same manner outline above, was to identify where this need could be best met, and to assess various parcels of land in terms of their ability to meet the need. The assessment sought to identify the preferred location for a solar farm.

4.5.2 Identifying appropriate locations for 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 import the required amount of power into the electricity grid, either directly into the substation or via a point of connection into the nearby transmission network.

- 4.5.3 Secondly, solar schemes must be located close enough to the identified substation to remain viable both in terms of cable deployment for the grid connection and to ensure that minimum transmission losses occur.
- 4.5.4 Based on the criteria set out above, the initial search area was identified as a 7.5 km radius from the Uskmouth Grid Supply Point (GSP) at the Severn Power Station. Within this search area, areas subject to key planning and environmental constraints were excluded. This resulted in limited opportunities for the scale of land to viably accommodate a commercial solar farm of the scale of the Proposed Development, without impinging on key environmental planning designations.
- 4.5.5 The subsequent step identified suitable land from a planning perspective. However, no land is currently designated for solar or renewable energy development. In relation to previously developed land, the only sites within an appropriate search radius and of sufficient size were located on land associated with the former Llanwern Steelworks between the A4810 and the South Wales Main Line railway, and land to the south of the A410, opposite the operational part of the Llanwern Steelworks. However, these areas were screened out either due to existing and ongoing uses or due to being allocated within the development.

4.6 Conclusion

- 4.6.1 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 consideration to be weighed in the planning balance against possible policy tension.
- 4.6.2 It is explicit from the above considerations that at a national and local level, there is significant policy support for renewable energy development. The Government has a target to deliver 70 GW of solar energy generation by 2035, compared to approximately 14 GW of installed capacity at present, and there is a clear expectation that solar power will provide a significant contribution to the achievement of legally



binding net zero target by 2050 and the UK electricity system achieving zero carbon emissions by 2035, as set out in the Sixth Carbon Budget and Net Zero Strategy.

- 4.6.3 It is also clear that to achieve the net zero target by 2050 and decarbonise electricity system by 2035, 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 ESO forecast that significant solar PV development will be required to remain on the correct trajectory for achieving net zero by 2050. Even these measures may not be ambitious enough considering the additional year stated in the FES 2023 for all three scenarios to meet the 2035 targets for achieving net zero within the power sector. The Proposed Development would make a notable contribution to achieving the anticipated requirements for solar PV in advance of 2035 and this should be given considerable weight in the decision-making process.
- 4.6.4 To summarise, there is a demonstrable need for the Proposed Development and the significant environmental, economic, and social benefits it would deliver. Full consideration of other relevant planning policy and other material considerations is provided within Section 5.0 below.



5.0 PLANNING POLICY CONTEXT

5.1 Introduction

5.1.1 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.

5.1.2 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)

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

5.2 National Development Plan

Future Wales – the National Plan 2040

5.2.1 Future Wales – the National Plan 2040²⁴ 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 2015²⁵, 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.

²⁴ <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

²⁵ [Well-being of Future Generations \(Wales\) Act 2015 – The Future Generations Commissioner for Wales](#)



- 5.2.2 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 Wales's 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.
- 5.2.3 **Policy 5 – Supporting the Rural Economy** 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”*.
- 5.2.4 **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 must be demonstrated as part of development proposals.
- 5.2.5 **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.



- 5.2.6 **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.”*
- 5.2.7 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. Proposals should also describe the benefits the scheme will bring in terms of social, economic, environmental, and cultural improvements to local communities.
- 5.2.8 The policy emphasizes the importance of where large-scale wind and solar schemes should be located, in stating that such developments *“will not be permitted in National Parks and Areas of Outstanding National Beauty, and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment”*.
- 5.2.9 **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”.*

5.2.10 **Policy 33 – National Growth Area – Cardiff, Newport, and the Valleys** states that Newport is one of three main focus areas for growth and investment in the Southeast region. The policy illustrates that “*the Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment*”.

5.2.11 The policy 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.



5.3 Strategic Development Plan

- 5.3.1 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.

5.4 Local Development Plan

- 5.4.1 At the time of writing, the adopted Local Development Plan (LDP), relevant to the Proposed Development includes the following documents:

- i) Newport Local Development Plan 2011-2026²⁶ (adopted January 2015).
- ii) Newport Local Development Plan 2011-2026 Proposal Maps²⁷; and
- iii) Newport Local Development Plan 2011-2026 Constraints Maps²⁸

- 5.4.2 The documents of the Local Development Plan and the relevant policies are set out in the following sections.

Newport Local Development Plan 2011-2026

- 5.4.3 The Newport LDP (adopted 2015) has been reviewed and the following policies have been identified as the most relevant in the context of the Proposed Development.

Policy SP1 Sustainability

- 5.4.4 Policy SP1 states that “*proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary.*” The policy further states that proposals will be assessed as to their potential contribution in relation to ten key criteria, one of which includes:

“iv) Reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources”.

²⁶ <https://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/LDP-Adopted-Plan-January-2015.pdf>

²⁷ <https://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/LDP-Proposals-January-2015.pdf>

²⁸ <https://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/LDP-Constraints---Jan-2015.pdf>



Policy SP3 Flood Risk

- 5.4.5 Policy SP3 requires development to be directed away from areas at risk of flooding and ensure that the risk of flooding is not exacerbated elsewhere. Development will only be permitted in flood risk areas in accordance with national guidance and further states that a detailed technical assessment may be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime. The policy also states that sustainable solutions to manage flood risk should be prioritised.

Policy SP4 Water Resources

- 5.4.6 Policy SP4 focuses on how development proposals should minimise water consumption, protect water quality during and after construction. It further states that development should incorporate sustainable management techniques, such as sustainable drainage systems (SUDS), resulting in no net increase in surface water run-off.

Policy SP5 Countryside

- 5.4.7 Policy SP5 states that development in the countryside will only be permitted where *“the use is appropriate in the countryside, respects the landscape character and biodiversity of the immediate and surrounding area as is appropriate in scale and design.”*

Policy SP9 Conservation of the Natural, Historic and Built Environment

- 5.4.8 Policy SP9 requires that *“the conservation, enhancement and management of recognised sites within the natural, historic and build environment will be sought in all proposals”* and any new developments should be of the highest quality.

Policy SP13 Planning Obligations

- 5.4.9 Policy SP13 necessitates *“deliver more sustainable communities by providing, or making contributions to, local and regional infrastructure in proportion to its scale and the sustainability of its location”* and are expected to provide or contribute to several infrastructure qualities, one of which includes:



“The protection, enhancement and management of the natural, historic and built environments”.

Policy SP21 Mineral Safeguarding

- 5.4.10 Policy SP21 states that that “the plan will fulfil its contribution to the regional demand by:

*“i) Safeguarding hard rock and sand & gravel resource blocks;
ii) Protecting the existing and potential wharves and existing rail infrastructure at Newport docks to ensure the continued sustainable transportation of aggregate;
iii) Encouraging the use of secondary and recycled aggregates where appropriate;
iv) Considering proposals for the winning and working of minerals in the regional context, whilst having clear regard to local factors”.*

Policy GP1 Climate Change

- 5.4.11 Policy GP1 suggests that that development proposals should adopt sustainable design techniques in order to tackle climate change. This includes the following:

“ii) Be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where practicable”.

Policy GP2 General Amenity

- 5.4.12 Policy GP2 highlights that the amenity enjoyed by people in their local environment should not be significantly harmed as a result of development. The policy further states that *“all development proposals should therefore be appropriate for the immediate location, and also for the wider setting/context. This scale, nature and siting of a proposal must be appropriate to the location and must not undermine the character of either the site or the locality.”* GP2 states that development will be permitted where:

“i) There will not be a significant adverse effect on local amenity, including in terms of noise, disturbance, privacy, overbearing, light, odours and air quality;



ii) the proposed use and form of development will not be detrimental to the visual amenities of energy occupiers or the character or appearance of the surrounding area”.

Policy GP4 Highways and Accessibility

5.4.13 Policy GP4 sets out general development principles in relation to highways and accessibility. Principles relevant to the Proposed Development have been set out below:

“Development proposals should:

- ii) Be accessible by a choice of means of transport;*
- iii) Be designed to avoid or reduce transport severance, noise, and air pollution;*
- v) Provide suitable and safe access arrangements; and*
- vii) Ensure that development would not be detrimental to highway or pedestrian safety or result in traffic generation exceeding the capacity of the highway network.”*

Policy GP5 Natural Environment

5.4.14 Policy GP5 outlines general development principles in relation to the natural environment and states that development will be permitted where:

- “i) The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the UK, Welsh and/or Newport biodiversity action plans;*
- ii) The proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, Welsh section 42 and local protected habitats and species, and protecting features of importance for ecology;*
- iii) The proposal will not result in an unacceptable impact on water quality;*
- iv) The proposal should not result in the loss or reduction in quality of high-quality agricultural land (grades 1, 2 and 3a);*
- v) There would be no unacceptable impact on landscape quality;*
- vi) The proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;*

vii) The proposal includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value.”

Policy GP6 Quality of Design

5.4.15 GP6 outlines general development principles in relation to design quality and states that good quality design should be incorporated into all forms of development, with the aim of creating a safe, accessible, attractive, and convenient environment. Development proposals should address the following fundamental design principles:

- “i) context of the site: all development should be sensitive to the unique qualities of the site and respond positively to the character of the area;*
- ii) access, permeability and layout: all development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;*
- iii) preservation and enhancement: where possible development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles. The designer is encouraged to display creativity and innovation in design;*
- iv) scale and form of development: new development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;*
- v) materials and detailing: high quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;*
- vi) sustainability: new development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible re-use of the building. Where existing buildings are present, imaginative, and sensitive solutions should be sought to achieve the re-use of the buildings”.*

Policy GP7 Environmental Protection and Public Health

5.4.16 Policy GP7 states that “development will not be permitted which would cause or result in unacceptable harm to health because of land contamination, dust, instability or subsidence, air, heat, noise or light pollution, flooding, water pollution or any other identified risk to environment, local amenity or public health and safety.” The policy



places further emphasis on the conservation and enhancement of the environment and quality of life, in stating that these are important aims of the LDP.

Policy CE4 Historic Landscapes, Parks, Gardens and Battlefields

- 5.4.17 Policy CE4 places importance on sites included in the register of landscapes, parks and gardens of special historic interest and identified historic battlefields and should be protected, conserved, enhanced and where appropriate, restored. The policy further states that attention will also be given to their setting.

Policy CE6 Archaeology

- 5.4.18 Policy CE6 requires development proposals to undertake an archaeological impact assessment before the proposal is determined where:

“i) Groundworks and/or the installation of services are proposed within the archaeologically sensitive areas of Caerleon, The Levels, Lower Machen and the City Centre, or;

ii) Within other areas of recognised archaeological interest.”

Policy CE8 Locally Designated Nature Conservation and Geological Sites

- 5.4.19 Policy CE8 highlights the importance of locally designated sites to the overall biodiversity of Newport and the requirement to ensure that there is no overall loss to the value it provides as an ecological resource. The policy states that:

“Proposals affecting locally designated sites will only be permitted where:

i) There would be no overall loss of the nature conservation resource for which the site has been designated;

ii) There would be no significant adverse effect on the geological interest of the site;

iii) Appropriate mitigation or compensatory measures can be achieved”.

Policy CE10 Renewable Energy

- 5.4.20 Policy CE10 states that *“renewable energy schemes will be considered favourable, subject to there being no over-riding environmental and amenity considerations”,* further stating that *“large scale proposals may be more appropriately located outside of the defined settlement boundary if no appropriate brownfield sites exist. The*



cumulative impacts of renewable energy schemes will be an important consideration”.

5.4.21 With reference to solar energy, paragraph 4.54 sets out key considerations that solar schemes will include in their assessments. This includes the ecological, landscape and visual impacts. The policy advises that *“the potential for ‘glint and glare’ will need to be explored as well as potential ecological and visual impacts from installation techniques such as cable trenches and the removal of hedgerows. Similarly the impact of associated infrastructure and security measures will need to be considered”.*

5.4.22 Paragraph 4.56 recognises the positive contribution renewable energy schemes can make to sustainability and climate change but also highlights that it must be balanced with the need to protect the environment and amenity.

Policy T7 Public Rights of Way and New Development

5.4.23 Policy T7 states that *“Any public footpath, bridleway or cycleway affected by the development proposals will require retention or the provision of a suitable alternative. Provision of additional routes, where appropriate, will be sought in new developments, with linkages to the existing network”.*

5.4.24 The policy further requires that development provides an opportunity to improve and provide new links to the Public Right of Way, and new routes should not be substantially less convenient or more hazardous than the original routes.

Policy M1 Safeguarding of Mineral Resource

5.4.25 Policy M1 states that development that would be incompatible with safeguarding hard rock or sand and gravel resources within the mineral resource areas will not be permitted unless it meets one of five criteria. The relevant criteria in the case of the Proposed Development is as follows:

“iii) The development is of a temporary nature and can be completed and the site returned to a state that does not inhibit extraction within the timescale that the mineral is likely to be needed”.



Newport Local Development Plan 2011-2026 Proposal Maps

5.4.26 The Newport Proposal Maps were adopted in January 2015 alongside the LDP. The maps identify that the Site sits within the following policy designations:

- i) The Levels Archaeologically Sensitive Area (Policy CE6); and
- ii) Countryside (Policy SP5)

Newport Local Development Plan 2011-2026 Constraints Maps

5.4.27 The Newport Constraints Maps were adopted in January 2015 alongside the LDP. The maps identify that the Site has the following constraints:

- i) Gwent Levels – Redwick and Llandeenny SSSI (Policy SP9 and GP5); and
- ii) TAN 15 Zones B²⁹ and C1³⁰.

5.5 Material Planning Considerations

5.5.1 There is no strict definition of what constitutes a ‘material consideration’ in planning legislation, although key principles from case law are that a consideration must have a planning purpose and fairly and reasonably relate to the development to be material. 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. The weight to be attached to material considerations is a matter for the decision maker.

5.5.2 Newport City Council are currently working on a Replacement Local Development Plan (RLDP)³¹ for Newport, which will set out a 15-year land use framework for the city. Consultation for the Preferred Strategy was undertaken between October and December 2023, and was due to be submitted to the Welsh Government for Examination in May 2025. It was expected that the RDLP would be adopted in February 2026 however the RLDP has not been adopted, and a draft version has not been made available. As a result, it is considered to hold little weight in the

²⁹Areas known to have been flooded in the past evidenced by sedimentary deposits

³⁰Areas of the floodplain without significant flood defence infrastructure

³¹ [Draft Vision, Issues & Objectives Document - English \(newport.gov.uk\)](https://newport.gov.uk/draft-vision-issues-objectives-document-english)



determination of the Proposed Development. Nevertheless, the draft objectives of the RLDP have been set out for completeness.

5.5.3 For the Proposed Development, the material considerations are set out below.

National (Wales)

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

Local

- i) Newport Replacement Local Development Plan 2021-2036;
- ii) Newport Supplementary Planning Guidance;
- iii) Newport Organisational Climate Change Plan 2022-2027;
- iv) Newport Local Area Energy Plan (2022); and
- v) Renewable and Low Carbon Energy Assessment: Newport City Council (2020)

Planning Policy Wales – Edition 12 (2024)

5.5.4 Planning Policy Wales³² (PPW) was revised in February 2024 to Edition 12 with revisions made to Chapter 6 to improve protection for the natural environment.

5.5.5 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.

³² <https://www.gov.wales/planning-policy-wales#description-block>

5.5.6 The intent to update Chapter 6 of PPW (Distinctive and Natural Places) was expressed by the Welsh Government in October 2023 by way of a letter to Chief Planning Officers from the Minister for Climate Change. This letter set out the proposed changes with respect to Green Infrastructure, Net Benefit for Biodiversity and the Step-wise Approach, Protection for Sites of Special Scientific Interest, and Trees and Woodland.

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

5.5.8 Section 5.7 discusses energy which highlights the Welsh Government's commitment to renewable energy, in 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.

5.5.9 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"*.



5.5.10 Section 6.4 focuses on Biodiversity and Ecological Networks and states at paragraph 6.4.25 that: *“Development in a SSSI which is not necessary for the management of the site must be avoided. This is a matter of principle to ensure that these sites can continue to fulfil their role at the heart of resilient ecological network.”*

5.5.11 This section (at paragraph 6.4.26) continues by stating:

“There is a presumption against all other forms of development in a SSSI as a matter of principle and this presumption should be appropriately reflected in development plans and development management decisions. There is also a presumption against development not within a SSSI but likely to damage a SSSI. In such cases, proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are clearly understood and development should be refused where there are adverse impacts on the features for which a site has been designated.”

5.5.12 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

5.5.13 Technical Advice Notes (TANs) provide local authorities with detailed planning advice which are taken into account when preparing development plans. The relevant TANs to the Proposed Development are discussed in more detail below.

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

5.5.14 TAN 5³³ provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

³³ <https://www.gov.wales/technical-advice-note-tan-5-nature-conservation-and-planning>



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

- 5.5.15 TAN 6³⁴ 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 response 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)

- 5.5.16 TAN 11³⁵ 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)

- 5.5.17 TAN 12³⁶ 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) (2026)

- 5.5.18 TAN 15³⁷ 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.

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

- 5.5.19 TAN 23³⁸ advises that in determining planning applications local planning authorities

³⁴ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

³⁵ <https://www.gov.wales/technical-advice-note-tan-11-noise>

³⁶ <https://www.gov.wales/technical-advice-note-tan-12-design>

³⁷ <https://www.gov.wales/technical-advice-note-tan-15-development-and-flood-risk-2004>

³⁸ <https://www.gov.wales/technical-advice-note-tan-23-economic-development>



need to bear in mind that traditional business use 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) (2026)

- 5.5.20 TAN 24³⁹ 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.
- 5.5.21 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 that the public benefit of taking action to reduce carbon emissions, or to adapt to the impact of climate change, should be weighed against any harm to the significance of historic assets.

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

- 5.5.22 Planning Implications of Renewable and Low Carbon Energy Development: Practice Guidance⁴⁰ 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;
 - v) Agriculture;
 - vi) Hydrology and flood risk; and

³⁹ <https://www.gov.wales/technical-advice-note-tan-24-historic-environment>

⁴⁰ <https://www.gov.wales/sites/default/files/publications/2018-09/planning-implications-renewable-low-carbon-energy-development.pdf>



vii) Cumulative impacts.

Energy Policies in Local Development Plans Letter (2015)

5.5.23 Energy Policies in Local Development Plans⁴¹ 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)

5.5.24 An objective of the Assessment of On-shore Wind and Solar Energy Potential in Wales⁴² was to identify the most appropriate locations for onshore wind and solar energy development in Wales (including for DNS).

5.5.25 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)

5.5.26 Planning for Renewable and Low Carbon Energy – A Toolkit for Planners⁴³ 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.

5.5.27 The Toolkit recognises solar energy as a key technology in helping to 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

⁴¹ <https://www.gov.wales/sites/default/files/publications/2018-11/energy-policies-in-local-development-plans.pdf>

⁴² [Assessment of on-shore wind and solar energy potential in Wales | GOV.WALES](#)

⁴³ [25697 Practice Guidance \(gov.wales\)](#)



no standard agreed approach to constraints mapping for solar farms, and provides 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)

5.5.28 Following the Welsh Government's declaration of a climate emergency in 2020, the Building Better Places⁴⁴ 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.

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

Designing for Renewable Energy in Wales (2023)

5.5.30 The Design Commission for Wales published the Designing for Renewable Energy in Wales⁴⁵ document in 2023 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.

⁴⁴ [Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery \(gov.wales\)](https://gov.wales/sites/default/files/publications/2023-12/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures-placemaking-and-the-covid-19-recovery.pdf)

⁴⁵ <https://www.gov.wales/sites/default/files/publications/2023-12/designing-for-renewable-energy-in-wales.pdf>



- 5.5.31 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 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.

Newport Replacement Local Development Plan 2021-2036

- 5.5.32 Consultation on the Preferred Strategy was undertaken between October 2023 – September 2024, with the RLDP expected to be submitted for examination in May 2025⁴⁶ and adopted in February 2026.
- 5.5.33 A key component of the overarching vision of the Newport RLDP is to create “a *resilient city which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the natural environment, including the benefits of ecosystem services, in a carbon neutral and climate responsible manner.*”
- 5.5.34 Following on from the vision, the RLDP sets out ten draft objectives, which will form the focus for the evidence base and policy development. The most relevant draft objectives in the context of the Proposed Development have been reviewed and are discussed in more detail below.

Draft Objective – Health and Well-being

- 5.5.35 The Health and Wellbeing Draft Objective is to improve health and well-being through sustainable growth, stating that planning must ensure that places are developed in a manner which reduces pollution for healthier and more liveable spaces.

Draft Objective – Natural Resources

- 5.5.36 The focus of the Natural Resources Draft Objective is to “*sustainably manage the natural resources in Newport to meet the needs of present and future communities,*

⁴⁶ <https://newportrl dp.co.uk/wp-content/uploads/2023/10/3.-Preferred-Strategy-Have-Your-Say-FAQs-Sheet-October-2023.pdf>



by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth”, further stating that the plan should ensure that development results in the sustainable management of natural resources, for example, the benefits of increasing renewable energy developments.

Draft Objective – Biodiversity and Geodiversity

- 5.5.37 The aim of the Biodiversity and Geodiversity Draft Objective is to “*maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development*”. It states that “*new development is required to secure biodiversity enhancement and maximise opportunities for biodiversity net gain, whilst improving ecological connectivity, avoiding, minimising and mitigating harm*”. In addition, the Draft Objective makes reference to the Regionally Important Geodiversity Sites (RIGS) located in Newport and are part of a network of geological and geomorphological sites considered worthy of protection. It states that “*new development will need to ensure that no detrimental impact upon this important and finite element of natural heritage occurs*”.

Draft Objective – Historic Environment

- 5.5.38 The Historic Environment Draft Objective focuses on the preservation, enhancement and recognition of the value of Newport’s heritage assets. It continues to state that it is “*imperative that new development is of the highest quality and does not prejudice the protection of the historic environment in Newport*”.

Draft Objective – Landscape

- 5.5.39 The aim of the Landscape Draft Objective is “*to protect and enhance the quality and character of Newport’s landscape, townscape and seascape, and maximise the opportunities these features offer*”.

“Newport’s coastal areas and adjacent levels are the areas of outstanding visual, historic, and ecological interest. There has been recent pressure from development on these areas (i.e., tourism, solar farms, agriculture etc.)”.



Draft Objective – Climate Change

- 5.5.40 The Climate Change Draft Objective aims to “*ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation*”. It further states that “low carbon electricity must become the main source of energy in Newport” and that “*renewable electricity should be better utilised to meet growing demand for both heating and transport*”. The draft objective also identifies the need for the RLDP to identify opportunities for renewable energy within its boundary, in line with national planning policy.

Newport City Council Supplementary Planning Guidance (SPG)

Planning Obligations SPG

- 5.5.41 The Planning Obligations SPG⁴⁷ states that “development will be required to help deliver more sustainable communities by providing or making contributions to local and regional infrastructure in proportion to its scale and the sustainability of its locations”.

Archaeology and Archaeologically Sensitive Areas SPG

- 5.5.42 The Archaeology and Archaeologically Sensitive Areas SPG⁴⁸ seeks to protect the archaeological heritage and its setting by advising how development proposals can best take account of archaeological issues.
- 5.5.43 “*The impact of the proposed development on the archaeological resource will be one of the material issues that the Authority will consider when they are determining the application, and whether or not the archaeological resource can be preserved in-situ on the site and be protected in the development. In cases involving less significant archaeological remains, the relative importance of the archaeological remains and*

⁴⁷ <https://www.newport.gov.uk/sites/default/files/media/media-documents/Planning-obligations-SPG.pdf>

⁴⁸ <https://www.newport.gov.uk/sites/default/files/media/media-documents/Archaeology-and-archaeologically-sensitive-areas-SPG.pdf>



their settings will be weighed against other factors, including the need for the proposed development.”

Wildlife and Development SPG

- 5.5.44 The Wildlife and Development SPG⁴⁹ states that “biodiversity must be actively considered by all development proposals”, further stating that “wherever possible, development should avoid impacting on any wildlife feature. If avoidance is not possible, the developer should be able to justify why avoidance of adverse impacts is not possible”.

Trees, Woodland, Hedgerows and Development Sites SPG

- 5.5.45 The SPG⁵⁰ recognises trees, woodlands and hedgerows as important features of an overall design of a development site. It further states that the “SPG will be a material consideration in the determination of all planning applications which can impact on or propose the inclusion of tree, woodlands or hedgerows”.

Air Quality SPG

- 5.5.46 The purpose of the Air Quality SPG⁵¹ is to help ensure consistency in the way in which air quality is dealt with through the planning system. It continues to recognise that “*air quality is a material planning consideration and the weight attached to such considerations will depend on the scope of the pollution control system in each case and the effect on land use and amenity*”.

Mineral Safeguarding SPG

- 5.5.47 The main aim of Mineral Safeguarding SPG⁵² is to provide information to assist with the consideration of planning application on mineral safeguarding areas for hard rock, sand and gravel with Newport Council.

⁴⁹ <https://www.newport.gov.uk/sites/default/files/media/media-documents/Wildlife-and-development-SPG.pdf>

⁵⁰ <https://www.newport.gov.uk/documents/Planning-Documents/Supplementary-Planning-Guidance/Tree-SPG-Post-Consultation-Adopted-Version-January-2017.pdf>

⁵¹ <https://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/Adopted-Air-Quality-SPG-February-2018.pdf>

⁵² <https://www.newport.gov.uk/documents/Planning-Documents/Supplementary-Planning-Guidance/Mineral-Safeguarding-SPG-Adoption-January-2017-version.pdf>



- 5.5.48 It sets out the issues which need to be addressed when applications are submitted within, or affecting, a mineral safeguarding zone. It provides a two-stage process which will either indicates that the proposal is such that mineral sterilisation is not an issue or indicate that prior extraction may be required.

Organisational Climate Change Plan (2022-2027)

- 5.5.49 Newport City Council declared a climate and ecological emergency in November 2021⁵³. Subsequently, an Organisational Climate Change Plan⁵³ was developed which sets out the themes, priorities, actions, and milestones required to achieve net zero carbon by 2030, and that the services provided support the city's journey to net zero and adaptation to climate change.
- 5.5.50 One of the measures to reduce emissions cross the city is to continue to install solar PV wherever possible. The report highlights the need for ground based solar PV, in stating that "*these larger systems can make a greater contribution to tackling the climate emergency*".

Newport Local Area Energy Plan (2022)

- 5.5.51 Newport's Local Area Energy Plan⁵⁴ sets out a vision for what a zero-carbon energy system could look like in 2050 and describes key immediate actions to achieve the overarching vision of "*develop a net zero energy system for Newport, as a city on the rise*". One of the key actions of the plan is to have up to ~975MW solar and wind capacity by 2050.
- 5.5.52 The report also highlights two solar farms that were considered Nationally Significant Infrastructure Projects (NSIPs). It details that planning permission was granted in 2020 and construction completed in 2021 for a 75MW solar farm at Llanwern,

⁵³ [*Newport City Council Organisational Climate Change Plan 2022-27*](#)

⁵⁴ [*Newport Local Area Energy Plan*](#)



Renewable and Low Carbon Energy Assessment: Newport City Council (2020)

5.5.53 The Renewable and Low Carbon Energy Assessment⁵⁶ examines the current and future energy demands of Newport, and progress in meeting these demands from local low carbon energy generation assets. The report highlights that solar PV has far fewer constraints than other forms of renewable energy infrastructure and there are a large number of areas within Newport that are considered suitable for ground mounted Solar PV development.

⁵⁶ <http://www.newport.gov.uk/documents/Planning-Documents/Replacement-Local-Development-Plan-2021/Preferred-strategy-report/Renewable-and-Low-Carbon-Energy-assessment-2020.pdf>



6.0 PLANNING ASSESSMENT

6.1 Introduction

6.1.1 This Section of the Planning Statement provides a detailed assessment of the Proposed Development in relation to relevant planning policy and guidance previously identified in Section 5.0. The purpose of this assessment is to demonstrate the overall compliance of the Proposed Development in the context of key planning policy considerations.

6.1.2 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) Local Amenity;
- vi) Flood Risk, Surface Water and Drainage;
- vii) Socio-Economics; and
- viii) Agricultural Land Use

6.2 Principle of the Development

6.2.1 The Site itself is not allocated in the LDP or NDP for any specific development use. The policy message in both the LDP and NDP is unambiguous in the support for the development of new renewable energy schemes.

6.2.2 Future Wales strongly supports the principle of renewable technology and energy from all technologies and at all scales. This message is primarily delivered through Policies 17, 18 and 33. 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, published on 14 July 2023.⁵⁷

⁵⁷ <https://www.gov.wales/written-statement-publication-summary-responses-consultation-wales-renewable-energy-targets>



- 6.2.3 These policies also 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. The Proposed Development would demonstrably support the objectives of these policies.
- 6.2.4 NCC demonstrate their support for renewable energy in policies SP1, GP1 and CE10 of the Newport LDP. The electricity generated from the operation of the Proposed Development would be able to meet the equivalent energy needs of over 45,374 Welsh homes and save over 3,180,368 tonnes of CO₂, which is the equivalent of planting over 52 million trees.⁵⁸ 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 and the Newport LDP.
- 6.2.5 Policy 18 provides a list of criteria which must be met for a renewable development proposal to be permitted. These are set out below and addressed in turn against the Proposed Development.
- 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).*
- 6.2.6 Chapter 5.0 of the ES assess the impact of the proposal on the surrounding landscape and finds there to be no unacceptable adverse impacts.
- ii) there are no unacceptable adverse visual impacts on nearby communities and individual dwellings.*
- 6.2.7 It is demonstrated within Chapter 5.0 of the ES that the Proposed Development would not have any unacceptable adverse visual impacts on nearby communities or 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*

⁵⁸ Reference <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

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).

6.2.8 No adverse impacts would occur on such sites as a result of the Proposed Development.

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.

6.2.9 No adverse impacts would occur on such sites as a result of the Proposed Development.

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

6.2.10 The Proposed Development would deliver a considerable net benefit for biodiversity, as indicated in Appendix 4.3 Landscape and Ecological Management Plan within the ES.

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

6.2.11 Chapter 8.0 undertakes an assessment of the impact on cultural heritage and finds there to be no unacceptable adverse impacts on built heritage assets.

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

6.2.12 Appropriate assessments have been carried out in the ES appendices (e.g., Glint and Glare / Noise Assessment) and conclude there to be no unacceptable adverse impacts in regard to these.

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).

6.2.13 No unacceptable impacts would occur in such facilities.



- 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.*
- 6.2.14 A Construction Traffic Management Plan (CTMP) (Appendix 4.2 of the ES) has been prepared for the scheme. The CTMP sets out the vehicle routeing and measures that construction vehicles would take to access the Site to avoid unnecessary adverse impacts on the local transport network.
- x) the proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources.*
- 6.2.15 As discussed in Chapter 4.0 of the ES, sustainable construction and procurement methods would be adopted where possible, with locally sourced materials and services being preferred for both construction and operation of the Proposed Development.
- 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.*
- 6.2.16 Decommissioning of the Proposed Development is addressed in Chapter 4.0 of the ES. 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. Waste materials would be recycled wherever the potential arises to do so.
- xii) The cumulative impacts of existing and consented renewable energy schemes should also be considered.*
- 6.2.17 Cumulative effects and impacts of the Proposed Development are considered within Chapter 10.0 of the ES. The Chapter finds there to be no significant cumulative effects / impacts in terms of existing and consented renewable energy schemes.
- 6.2.18 As demonstrated above, the Proposed Development is considered to conform to all criteria of Policy 18.
- 6.2.19 In summary, it is demonstrably the case that the Proposed Development for a renewable energy scheme is supported in principle by policies of the LDP and NDP.



The Proposed Development would deliver a sustainable scheme for the Site and meets all relevant local and national policy tests on renewable energy.

6.3 Landscape and Visual Effects

- 6.3.1 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 5.0 of the Environmental Statement (ES) submitted in support of this application.
- 6.3.2 The LVIA identifies that the local landscape is characterised by a mixture of medium to large, regular, and irregular fields. The fields are currently in agricultural use and are divided by a diverse mix of hedgerows, linear tree belts and small woodlands. Straight ditches (or reens) also border and divide the flat fields, focussed broadly to the south and east, and are often lined by mature vegetation. Sloping fields sit to the west and north, rising up from the fringes of the linear settlement of Bishton on the lower slopes. The linear settlement of Bishton largely runs along the minor road from the south to the north.
- 6.3.3 A Zone of Theoretical Visibility (ZTV) was undertaken as part of the LVIA which identifies that the visibility of the Proposed Development would be largely from within the Site itself and in the immediate surrounds, mainly extending across the Gwent Levels landscape to the east. Accordingly, the main visual impacts of the Proposed Development would be within the Site and the adjacent land, notably the fringes of Bishton, public rights of way that branch out from Bishton and cross the Site, and from the network of minor roads that intersect and border the Site. The proposed layout of the solar panels has been sensitively approached to minimise the visual impacts on these visually sensitive areas., including ensuring extensive offsets are in place by setting the panels back from the site boundaries.
- 6.3.4 Views of the Proposed Development from the landscape further afield would be restricted by the undulating landform and woodland to the west and north, as well as the large-scale buildings associated with the Llanwern Steelworks to the south.
- 6.3.5 In addition, landscaping is proposed within the Site which, among other benefits, would provide visual screening. This screening would help mitigate visual impacts of the Proposed Development and create an attractive landscape within the Site.



- 6.3.6 Considering the above points, and the measures set out in the LVIA, the Proposed Development would not result in an unacceptable adverse visual impact on the surrounding landscape. It is therefore considered to be compliant with policies SP9, SP13, GP2, GP5, GP6 and GP7 of the LDP. Furthermore, the Proposed Development is not located within a National Park or Area of Outstanding Natural Beauty and would therefore comply with policies 17 and 18 of the NDP.
- 6.3.7 As discussed elsewhere within this Planning Statement, the Site sits within an area designated as countryside under policy SP5 of the LDP. However, the LDP is silent on the acceptability of renewable energy developments within the countryside. TAN 6, 'Planning for Sustainable Rural Communities', provides further guidance on the type of development that should be permitted in such designations. The guidance states that the planning system must accommodate the need for renewable energy generation and should seek to strengthen rural communities to obtain a higher proportion of their energy needs from local renewable energy sources. In addition, TAN 6 also describes renewable energy as an appropriate use of farm diversification. Accordingly, the Proposed Development is considered to be in compliance with policy SP5 of the LDP.
- 6.3.8 In summary, it is considered that the Proposed Development would accord with all landscape and visual policies the NDP and the LDP.

6.4 Ecology

- 6.4.1 An Ecology Assessment has been prepared and is presented within Chapter 6.0 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 6.0 and Appendices 6.1 to 6.8 of the ES.
- 6.4.2 Chapter 6.0 identifies that the Proposed Development would not result in any significant negative effects on statutory or locally designated nature conservation sites. In addition, the Proposed Development would result in a 'Minor Positive' effect on Gwent Levels SSSI – Redwick and Llandeenny, reens, ditches and some protected species, which is attributed to the considerable proposed on-site landscaping improvements.



- 6.4.3 These on-site landscape proposals have been designed to fulfil a number of functions. In addition to the visual improvements, the landscaping would provide for biodiversity gains through the inclusion of native woodland and hedgerow planting, as well as creation of species rich grassland. Overall, these landscaping proposals would provide enhancement of the existing ecological offering over the Site.
- 6.4.4 Several measures have been identified in Chapter 6.0 to provide ecological enhancement over the Site. These include, but is not limited to:
- i) Creation of over 47 ha of wildflower grassland throughout the Site enhanced with shrill carder bee food plants.
 - ii) At least 10 woodcrete bat boxes would be fitted onto trees.
 - iii) Grassland management within all buffer areas would create a more diverse sward through natural succession.
 - iv) Areas of retained grassland and sown areas associated with the panels would be managed together after the first year of operation. It is intended that land beneath the panels would be grazed by sheep at suitable stocking levels (around 6-8 animals per ha), although this may change during the lifetime of the solar farm depending on changing agricultural practices and management. If any changes to grazing/management are required during the lifetime of the project, it would be agreed in advance in writing with planning authority and Natural Resources Wales (NRW).
 - v) Any large (>2m) gaps in hedgerows on the northern side of ditches would be in-filled with native hedgerow species. This will comprise shrubs and trees of local provenance on the Gwent Levels tree list, and the species mix will reflect the mix within the adjacent hedgerow sections. Prior to planting, locations would be agreed in writing with the planning authority and NRW.
 - vi) Over 11.3km of new tree/hedge planting, resulting in the creation of new habitats with improved interconnectivity throughout the Site.
- 6.4.5 These measures, together with the on-site landscape / habitat proposals would deliver a considerable net benefit for biodiversity, as described in ES Appendix 4.3 Landscape and Ecological Management Plan. As such, the Proposed Development accords with policy 9 of the NDP, which places emphasis on enhancing biodiversity, provision of green infrastructure and maximising ecological opportunities. In addition, the Proposed Development is considered to accord with Policies 17 and 18 of the

NDP and Policies GP5 and GP7 of the LDP, which require development proposals to demonstrate that they will not have an unacceptable adverse impact on the environment. Furthermore, the Proposed Development conforms with Policies SP13 and GP7 as it would contribute to the protection, enhancement, and management of the natural environment, as well as encouraging biodiversity and ecological connectivity.

6.4.6 Chapter 6.0 of the ES concludes that the Proposed Development would not result in any significant adverse environmental effects and therefore would be compliant with the NDP.

6.4.7 Importantly, the Proposed Development would result in clear benefits to qualifying features of the SSSI, notable habitat improvements for Shrill Carder Bees and the improvement in condition, and long-term management of, the reens and ditches in this area of the site. This, in addition to a lack of impact on the conservation objectives of the Gwent Levels SSSI – Redwick and Llandeveyry, would result in a considerable improvement in the condition of a nationally important conservation site. It is therefore considered to meet the latest requirements set out in Chapter 6 of Planning Policy Wales in relation to development within SSSIs.

Ornithology

6.4.8 An Ornithology Assessment has been prepared and is contained within Chapter 7.0 of the ES. A comprehensive series of ornithological surveys were undertaken on the Site to determine whether the Proposed Development has the potential to give rise to any significant adverse effects on the existing ornithology resource. The conclusions of the survey work are reported in Chapter 7.0 and Appendices 7.1 and 7.2 of the ES.

6.4.9 The ornithological assessment has shown that a suite of bird species utilise the Site throughout the year, both for breeding and winter foraging, shelter and roosting. This includes some species associated with statutory nature conservation sites and species of conservation concern.

6.4.10 The assessment concludes that the application area does not form a core area for any SPA/Ramsar species, with no significant numbers of any individual species identified.



- 6.4.11 The construction of the arrays would not impact on the integrity of the nearby SSSIs. Although snipe have been recorded occasionally using single field compartments, the residual effect upon the Seven Estuary SSSI is not considered to be significant.
- 6.4.12 The majority of ornithological interest on the application site is of site or local value and the Proposed Development would not result in significant effects. A number of land management proposals associated with the development can result in positive impacts for both wintering and breeding species.
- 6.4.13 As mentioned previously, the Proposed Development would deliver a considerable net benefit for biodiversity. This would provide a positive, long-term impact for habitat creation and management for wildlife, including reed management. This would provide significant benefits for bird species at the local level and benefit a number of Section 7 species on the IUCN register⁵⁹, including Amber and Red-listed birds of conservation concern. This will be partly achieved by creating new nesting opportunities in the form of bird boxes fixed to suitable trees on field boundaries. However, the most important enhancement for the majority of birds would be achieved through the proposed changes in land management and the creation of wide buffers to boundary features.
- 6.4.14 In considering the matters discussed above, the Proposed Development accords with Policy 9 of the NDP, as the proposals would maximise and enhance biodiversity over the Site through the creation of habitats and the sustainable management of the existing flora. Similarly, the Proposed Development is supported by Policies 17 and 18 of the NDP, as it demonstrates biodiversity improvements and benefits and is particularly relevant to sub-sections iii), iv) and v) of policy 18. Similarly, in the LDP, the Proposed Development accords with SP9, SP13, GP5 (particular sub-section i)), GP7 and CE8.
- 6.4.15 In summary, the Proposed Development is considered to accord to all relevant policies of the LDP and NDP in relation to ecological / conservation matters.

⁵⁹ "Established in 1964, the International Union for Conservation of Nature's Red List of Threatened Species has evolved to become the world's most comprehensive information source on the global extinction risk status of animal, fungus and plant species". (source: <https://www.iucnredlist.org/about/background-history>)



6.5 Cultural Heritage and Archaeology

- 6.5.1 In accordance with LDP Policy CE6, a Cultural Heritage and Archaeology Assessment has been undertaken and is presented within Chapter 10.0 of the ES. The Assessment evaluates whether the Proposed Development would give rise to any significant adverse effects upon cultural heritage and archaeology.

Cultural Heritage

- 6.5.2 ES Chapter 10.0 identifies that three Listed Buildings (Grade II* Church of St Mary, Llanwern, Grade II Barn at Barn Farm and Grade II Church of St Cadwaladr, Bishton) as well as four Scheduled Monuments (Bishton Castle, Wilcrick Hillfort, Deserted Village Earthworks and Monument north-west of Wilcrick Hill Camp) are within 1km of the Site. The impact of the Proposed Development would constitute a Negligible Adverse or Minor Adverse effect on these assets, which would be time-limited and fully reversible upon decommissioning of the solar farm.
- 6.5.3 Llanwern Park, a non-designated historic asset is located immediately adjacent to the Site, however no impacts are anticipated to occur on this asset as a result of the Proposed Development.
- 6.5.4 Land within the eastern part of the Site is within one of the designated Historic Landscape Character Areas, Green Moor. This is a defined area of historic landscape in the southern part of the Site and represents the northern edge of the former wetlands, Gwent Levels. However, Green Moor is outside the registered Gwent Levels Landscape of Outstanding Historic Interest, which is separated by the substantial developments at the Llanwern Steelworks and Gwent Europark, the latter including large wind turbines as well as substantial commercial buildings.
- 6.5.5 The Assessment identifies that the part of Green Moor within the Site makes some contribution towards the overall significance of the registered historic landscape as a reasonably well-preserved area of former back-fen. The Assessment concludes that the Proposed Development would pose a Moderate Adverse effect on Green Moor, however this would be time-limited and fully reversible on decommissioning the Proposed Development. Wider benefits of the scheme would also outweigh this dis-benefit.



- 6.5.6 In light of the above, it is considered that the benefits of the Proposed Development outweigh the temporary and reversible effects on Green Moor. This is supported by TAN 24, which states that changes to the historic environment are inevitable due to the overriding need to respond to social, cultural, economic, and technological changes. TAN 24 also highlights that the public benefit of taking action to reduce carbon emissions or to adapt to the impact of climate change should be weighed against any harm to the significance of historic assets. This should therefore be weighed favourably in the planning balance.

Archaeology

- 6.5.7 An assessment of effects on buried archaeological remains is presented within Chapter 10.0 of the ES. The Chapter identifies the potential for buried archaeological remains to be present within all parts of the Site. The Proposed Development would incorporate a targeted programme of further archaeological investigation which would be agreed with Glamorgan Gwent Archaeological Trust and NCC. This would likely be in the form of trial trenches and would allow for the development of an appropriate strategy to avoid, reduce, or offset any impacts that could occur during the construction phase.
- 6.5.8 Furthermore, as some areas within the southern part of the Site are located in the reclaimed former wetland of the Gwent Levels, there is potential for deposits of paleoenvironmental interest such as peats or similar organic material to be present. It is unlikely that the construction and operation of the Proposed Development would cause any desiccation of waterlogged deposits as no element of the scheme would affect groundwater flows on such deposits.
- 6.5.9 A programme of further investigation would include appropriate examination of the deposit sequence in those southern parts of the Site which are within the former wetlands of the Gwent Levels. This would be in the form of the drilling of boreholes producing cores that could be inspected off-site. The paleoenvironmental potential of such deposits would be assessed and an appropriate strategy would be developed and agreed in order to avoid, reduce or offset any impacts that could occur during the construction phase.



- 6.5.10 In consideration of the above, the Proposed Development would result in a residual Negligible Adverse or Minor Adverse effect on both archaeological remains and paleoenvironmental deposits, which would be permanent in nature but not significant in EIA terms.
- 6.5.11 Accordingly, the Proposed Development conforms with Policies 17 and 18 of the NDP as it would not result in an unacceptable adverse impact on the environment and statutorily protected built heritage assets. The Proposed Development would also demonstrate consistency with policies SP13, GP7 and CE4 of the LDP, as it contributes to the protection, enhancement, and management of the natural environment.

6.6 Local Amenity

Noise

- 6.6.1 A Noise Assessment has been carried out for the Proposed Development and is presented in Appendix 3.2 of the ES. The Assessment concludes that, with the proposed mitigation measures implemented, the operation of the Proposed Development would generate low noise levels at surrounding properties both during the day and night-time periods. A preliminary assessment of the noise levels against the requirements of BS 4142 concluded that the operation would result in a low potential for adverse impact, with noise levels remaining below the prevailing background noise levels. Furthermore, an assessment of the overall noise levels during the night-time and early morning periods indicated the operation of the plant would result in noise levels achieving a 'No Observed Effects Level', thus ensuring that the operation did not result in the potential for adverse noise impacts.
- 6.6.2 Accordingly, the Proposed Development is considered to be compliant with LDP Policy GP2, (particularly subsections i) and ii)), and NDP Policies 18 (subsection vii) and Policy 17.

Greenspace

- 6.6.3 New green outdoor community spaces would be created as part of the Proposed Development, consisting of picnic areas, benches, and a community orchard on otherwise private land. This is supportive of NDP Policy 9 and LDP Policy GP6. The



Proposed Development would also enhance educational opportunities by providing educational boards detailing the history of the area and a description of the local wildlife present. A new educational resource would be provided in the form of an outdoor classroom area. The Proposed Development would sponsor local schools in partnership with the Good Bee Company, providing free curriculum lessons from qualified beekeepers, site visits to the bee hotels and wildflower garden establishment on school grounds. Bee hotels would also be set up across the Site to protect and enhance local bee populations.

- 6.6.4 In light of the above, the Proposed Development would support a rural and sustainable community, which is the main aim of NPD Policy 5. NDP Policy 9, and LDP Policies GP5 and GP7 all promote the natural environment, particularly in relation to green infrastructure and biodiversity networks. As discussed previously in this appraisal section, the Proposed Development would provide significant net benefit for biodiversity within the Site.

6.7 Hydrology and Flood Risk

- 6.7.1 The likely significant effects of the Proposed Development on the environment in respect to surface waters and flooding are assessed in Chapter 9.0 of the ES. A Hydrological Assessment is provided in Appendix 9.1. The modelling work predicted slow moving flood waters to affect the Site generally to relatively shallow depths that should not be an impediment to solar development. During the 1 in 100 year +25% event predicted depth across the majority of the site are less than 0.3m and in low-lying land in the southeast depths are almost entirely below 0.5 m which is not considered to be a constraint to placement of normal solar panel arrays. In the southwest there is a relatively small areas where depths of up to 1.3 m are predicted, which would require raising of panels.
- 6.7.2 Sensitivity testing also demonstrated that the model results are not particularly sensitive to modelled roughness, the downstream boundary definition, the definition of the bund or the modelled flows.
- 6.7.3 The Proposed Development is therefore in line with policies SP3, SP4 and GP1 of the LDP.



Construction Phase

- 6.7.4 Should the Proposed Development be approved, a community benefit fund would be paid directly to Bishton Community Council upon commencement of construction. This would contribute to community projects and initiatives, including rooftop solar installations for residents, village improvements and energy saving measures.
- 6.7.5 Locally-sourced materials would be used in the construction phase, where available. 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. If necessary to bring in workers from outside the area, revenue would be generated for local businesses and the local economy.

Operational Phase

- 6.7.6 During the operational phase, the Proposed Development would greatly improve accessibility of pathways with the installation of accessible gates, re-instating all footpath bridges across ditches and reens and creating enhanced footpaths. All footpaths would be protected and widened to 10 m, equipped with educational plaques describing local wildlife and the surrounding landscape. Furthermore, the introduction of new permissive pathways will allow additional use of an otherwise private site, linking the pathways to ca. 47 ha wildflower meadows and recreational sites situated in several areas across the Site. All footpaths would be planted with wildflower margins.
- 6.7.7 The Proposed Development would sponsor local schools in partnership with the Good Bee Company, providing free curriculum lessons from qualified beekeepers, site visits to the bee hotels and wildflower garden establishment on school grounds.
- 6.7.8 The Site would be rented through a lease and the landowners would receive a proportion of the electricity generation profit. On a wider scale, 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.
- 6.7.9 Gas currently makes up 70% of Wales' energy generation needs. The Proposed Development would reduce this reliance and increase the renewable energy



generation capacity of the country, benefiting not only human populations but also the wider environment.

- 6.7.10 In light of the above, it is considered that the Proposed Development would be strongly supported by NDP Policies 5, 17 and 33.

6.8 Socio-economics

- 6.8.1 There are a number of Public Rights of Way (PRoW) that cross the Site, representing well established and historic community routes. These are illustrated on Figure 4.1 Illustrative Landscape Masterplan. The majority of these PRoW are designated as footpaths, with the exception of a Restricted Byway (158/22/1) that runs for approximately 150 m south of Castle Farm Shop, and a Green Lane (388/GL4/1), which starts immediately south of the residential property called Wellsworth, and runs north-east through to Ridings Wood.
- 6.8.2 All of these PRoW would remain open for public use during both construction and operation of the Proposed Development. All footpaths would be widened to a minimum of 10 m to improve accessibility, with ongoing management to maintain surfaces and the wildflower margins that would be planted within these routes.
- 6.8.3 The Proposed Development is therefore fully supportive of Policy T7 of the LDP.

6.9 Agricultural Land Use

- 6.9.1 According to the Agricultural Land Classification, approximately 1ha of the Site is designated as non-agricultural land, 182ha as Grade 4 ('Poor Quality') and 31.1ha as Grade 3b ('Moderate Quality'). Therefore, the agricultural use of the Site is limited by its quality, and it would be financially unviable for arable crops on any part of the Site. Accordingly, the installation of a solar farm would represent a more economically viable option for the use of the relatively poor-quality agricultural land. The Proposed Development would accord with Policy 5 of the NDP in this regard.
- 6.9.2 During the operation of the solar farm, the Site would continue to be grazed by livestock. The solar panels would be spaced 4-10m apart to allow for the growth of grass, allowing sheep and chickens to continue grazing on an already pastoral farm and thus not compromising the existing food production generated by the Site. Accordingly, the Site would largely be protected and preserved as a greenfield site



during the operation of the Proposed Development. The Site, with the exception of the on-site sub-station and associated access track, would ultimately be restored to its original condition following decommissioning of the scheme.

- 6.9.3 In light of the aforementioned, it is considered that the Proposed Development aligns with, and is supported by, NDP policies 17, 33, and LDP policies SP1 and SP5.



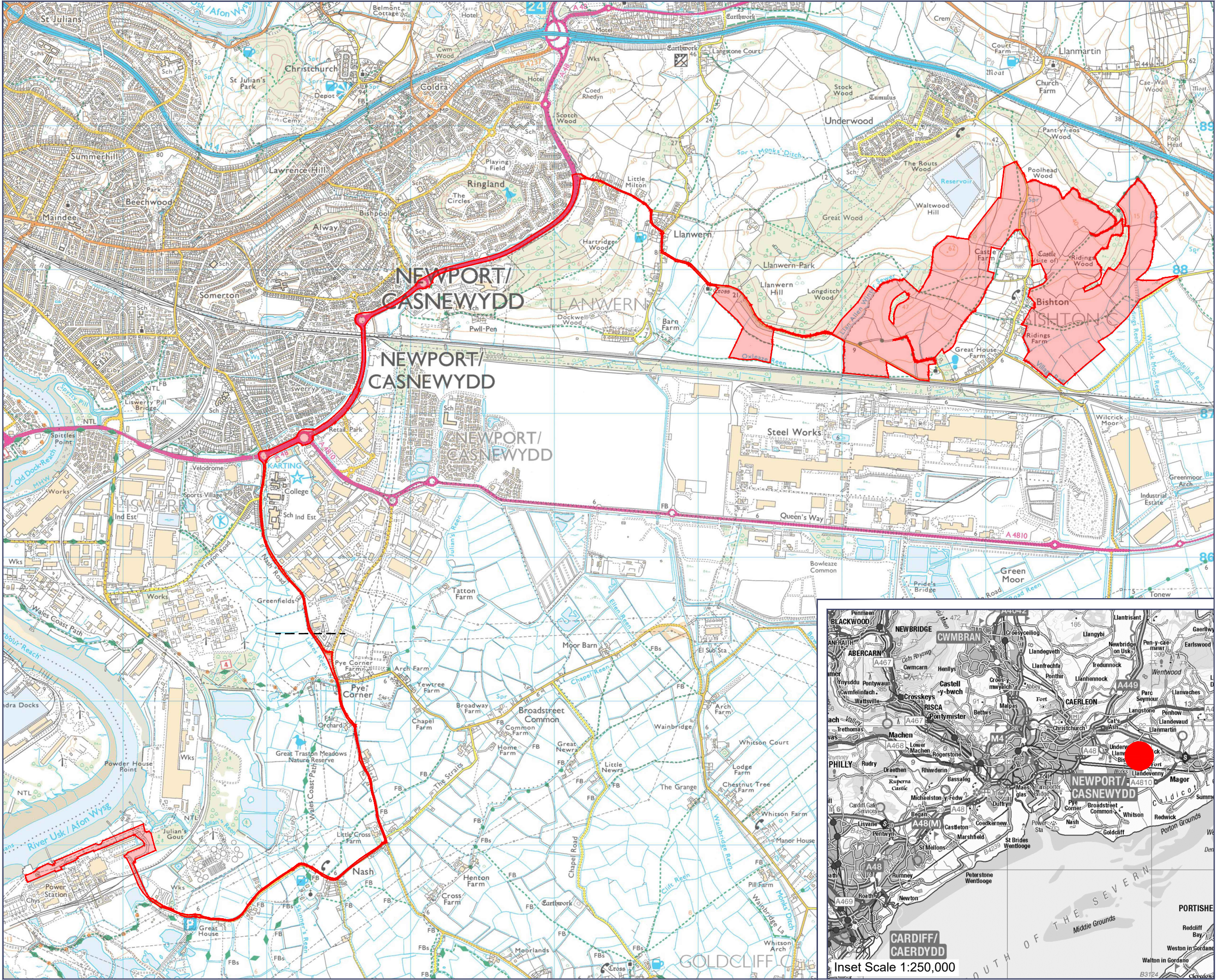
7.0 SUMMARY AND CONCLUSIONS

- 7.1.1 The Proposed Development would support the decarbonisation of the energy industry in Wales and the UK through the provision of a source of renewable energy generation. The proposal would generate electricity for local homes and businesses and contribute towards net zero carbon targets.
- 7.1.2 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.
- 7.1.3 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.



Figure 1 – Site Location Plan





Application Boundary

Site Location



0344 8700 007

axis.co.uk

Project

Craig Y Perthi Solar Farm

Figure Number

Figure 1.1

Figure Title

Location Plan

Scale

1:25,000 @A3

Date

July 2026

