



PLANNING STATEMENT

GOLDBOROUGH ROAD BATTERY ENERGY STORAGE SYSTEM
LAND SOUTH OF GOLDBOROUGH ROAD, HUNDLETON, PEMBROKE, NEAR SA71 5SH
P16-01-PS FEBRUARY 2024

CONTENTS:

1.	INTRODUCTION	2
	The Applicant	2
	EIA Screening	2
2.	SITE AND SURROUNDINGS	4
	Existing Site	4
	Planning History	5
	Designations	5
3.	PROPOSED DEVELOPMENT	6
	Construction	7
	Operation and Decommissioning	7
4.	RENEWABLE ENERGY AND CLIMATE CHANGE	8
	International Context	8
	National Context	10
	Local Context	16
	Decarbonisation and the Nature Emergency	16
5.	PLANNING POLICY CONTEXT	17
	National	17
	Technical Advice Notes	22
	Local	24
	Supplementary Planning Guidance	27
	Material Considerations	27
6.	PLANNING APPRAISAL	28
	The Principle of The Development	29
	Landscape and Visual	31
	Flood Risk	32
	Ecology and Biodiversity	33
	The Historic Environment	34
	Impact on Amenity	34
	Construction Traffic and Access	35
	Other Relevant Considerations	35
	Benefits	36
7.	CONCLUSION	40

APPENDIX 1 – PEMBROKE COUNTY COUNCIL EIA SCREENING OPINION

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Pembroke Green Limited (“The Applicant”) to accompany a full planning application to Pembrokeshire County Council (PCC) for the proposed installation of a Battery Energy Storage System (‘BESS’) with associated infrastructure and works (“the Proposed Development”) on land south of Goldborough Road, Hundleton, Pembroke, near SA71 5SH (“the Site”).
- 1.2 The Proposed Development is designed to reinforce the National Grid by providing instantaneous energy balancing services. This is achieved by storing energy produced when demand is low or there is an over-supply, which can be distributed when demand increases. These systems mitigate the intermittent nature of renewable energy generation sources.
- 1.3 A significant increase in renewable energy generation is supported by national and local planning policy and relevant material considerations, such as the UK Governments 2050 ‘net zero’ target, which will require a rapid and expanded deployment of zero and low-carbon electricity generation, supported by energy storage, if climate change is to be tackled within our lifetimes.
- 1.4 This report sets out the planning policy context relating to the benefits and acceptability in principle of the Proposed Development. The Proposed Development is assessed against the applicable planning framework and details how environmental issues have been addressed. This report should be read in the context of the entire submission to fully understand the Proposed Development, its potential impacts and planning merits.

The Applicant

- 1.5 Pembroke Green Limited is a joint-venture partnership between Enso Energy and Cero Generation.

EIA Screening

- 1.6 An Environmental Impact Assessment (EIA) Screening Request in accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) for a proposed BESS on the Site was submitted by Enso Energy to PCC on 26 July 2023. This provided details of the baseline condition, the proposed approach to the assessment and the likely potential effects arising from the Proposed Development.

- 1.7 A Screening Opinion was received on 4 September 2023 (Planning Ref. 23/0402/SC) confirming an Environmental Statement (ES) would be required under the Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.
- 1.8 PCC advised that Landscape and Ecology impacts would be required to be addressed within the ES. These topics are considered in the accompanying ES and supporting environmental assessments.
- 1.9 The PCC Screening Opinion is attached at **Appendix 1**.

2. SITE AND SURROUNDINGS

Existing Site

- 2.1 The Site comprises land totalling approximately 6.8 hectares (ha). This includes the main BESS site, access to the public highway, and the underground cable route that connects the BESS to the point of connection at Pembroke Substation to the north of the Site.
- 2.2 The main BESS site sits within an irregularly shaped agricultural field, with the cable route to the point of connection crossing agricultural land and Goldborough Road to the east, before turning north towards Pembroke Power Station. The grid reference for the proposed BESS site is SM 92762 01061.
- 2.3 With regards to topography, the main BESS Site has a southerly aspect, sloping gently from approximately 60m above ordnance datum (AOD) on the northern boundary to 55m AOD on the southern boundary.
- 2.4 The immediate context comprises agricultural land set within fields which have strong hedgerow boundaries. The southern and western boundaries of the Site are bounded by a belt of trees and a watercourse. The eastern and northern boundaries comprise hedgerow planting. There is a small gap in planting on the north-western boundary.
- 2.5 Agricultural land and the settlement of Wallaston Green are located to the south; The C3101 road, agricultural land and two solar farms (Hoplass Solar Farm and Wogaston Solar Farm) are located to the west; Green Hill Reservoir is located to the north with Pembroke Power Station, the Valero Oil Refinery beyond; agricultural land and Lambeth Farm are located to the east.
- 2.6 The Valero Oil Refinery and the Pembroke Combined Cycle Gas Turbine ('CCGT') Power Station with overhead electricity transmission power lines are located approximately 1km north of the Site. Within the broader setting, the Dragon LNG terminal and South Hook LNG terminal are visually prominent features within the landscape near Milford Haven.
- 2.7 Pembroke Dock is located approximately 3.5km to the north-east of the Site. Milford Haven is located approximately 5km to the north-west of the Site.
- 2.8 Access to the Site is achieved via the C3101, leading to the B4320 towards Pembroke with the A477 beyond. There are no Public Rights of Way (PRoW) within the BESS Site. The Wales Coast Path, which runs around and through the Angle Peninsula is located approximately 1km to the

east of the BESS Site at its closest point. Footpath SP34/6 is located approximately 100m to the northeast of the BESS site.

Planning History

- 2.9 There are no Development Management applications relevant to the Site.

Designations

- 2.10 The Site is located within the 'Milford Haven Waterway' Landscape of Outstanding Historic Interest. This historic landscape is included in the non-statutory Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales.
- 2.11 There are no designated ecological sites or features within the Site Boundary.
- 2.12 There are no designated historic assets within the Site boundary. The nearest listed building is Somerton Farmhouse (Grade II) located approximately 700m to the south of the Site. The nearest Designated Heritage Asset is the Wallaston Round Barrows Scheduled Ancient Monument, located approximately 600m to the south of the Site.
- 2.13 The Pembrokeshire Coast National Park (*Parc Cenedlaethol Arfordir Penfro*) is located to the south and west of the site, approximately 1.1km from the Site at its closest point.
- 2.14 The Site is located within National Landscape Character Area 47: South Pembrokeshire Coast (NLCA). This area is described as 'A spectacular coastal landscape of rugged cliffs, headlands and golden sandy bays and dunes and forms some of the finest scenery in southern Britain'. The landscape of the Angle Peninsula, in which the Site is located, is described as 'The gently undulating limestone plateau of Angle in the west is framed by views of the industry at Milford Haven and Pembroke Dock to the north. The Chimneys from the nearby oil refinery and power station serve as a reminder of the close proximity of these industrial ports. Overall though, this area retains its strongly rural and coastal identity, which is a defining feature of the National Park in which it lies'.
- 2.15 The Agricultural Land Classification report confirms the Site is comprised of Grade 3b land and is therefore not classified as 'Best and Most Versatile' land.

3. PROPOSED DEVELOPMENT

3.1 The Proposed Development is for a Battery Energy Storage System with associated infrastructure and works. The BESS will provide high-speed energy balancing services to the National Grid. All associated plant and equipment, together with associated development (such as CCTV and fencing), landscaping, surface water drainage system and works are included within the proposals. The main components of the Proposed Development comprise:

- Battery storage facility comprising a series of linked batteries housed within shipping containers (or containers of similar appearance);
- Inverter/transformer stations with cooling equipment and associated electrical infrastructure are distributed evenly across the site housed within metal containers;
- Underground cabling to connect the battery storage facility and inverters/transformer stations to the proposed on-site 132kV substation and control room, which comprises the plant and equipment necessary to export the electricity stored on-site to the electricity network;
- Underground cabling from the BESS to the Pembroke Substation;
- Security fencing (2.4m high metal weld mesh) and monitoring CCTV/infra-red cameras mounted along the perimeter of the BESS Site;
- Landscape planting, biodiversity enhancements and surface water attenuation measures;
- Groundworks; and
- land for the temporary construction laydown area and site access from the public highway.

3.2 The connection to the grid will be made at Pembroke Substation, located approximately 1.3km northeast of the BESS compound. The cable would run below ground from the boundary of the Site directly to the Point of Connection.

3.3 The total Site extends to approximately 6.8 hectares. The BESS compound occupies approximately 1.7 hectares of this area; the rest of the site is dedicated to access from the highway network, the cable route corridor, biodiversity improvements, surface water drainage feature, landscaping and other planting.

Construction

- 3.4 The construction of the proposal would take place over 12 months. The construction would include all electrical works and engineering works for the Proposed Development.
- 3.5 A Construction Traffic Management Plan (CTMP) will be prepared and submitted with the planning application and be implemented during the construction phase. The aim of the CTMP is to set out traffic management measures that would be adopted during the construction phase to reduce the effect on the highway network. It will contain all the required information for the construction phase, as well as a package of mitigation measures.

Operation and Decommissioning

- 3.6 Once operational there would be limited vehicle visits each month comprising a transit style van or similar.
- 3.7 Detailed landscape proposals would be prepared and submitted with the planning application. These proposals will set out how the land would be managed throughout the operational phase of the development. It is anticipated that it would be managed in such a way as to deliver biodiversity enhancement.
- 3.8 At the end of the project's operational life, the BESS would be decommissioned with all electricity generating equipment and built structures associated with the development removed from the Site.

4. RENEWABLE ENERGY AND CLIMATE CHANGE

International Context

COP 28 – The UAE Consensus (2023)

- 4.2 The UAE Consensus is the first ‘global stocktake’ that sets out the ambitious actions needed to keep the 1.5oC within reach and assess the progress since the signing of the Paris Agreement. The UAE Consensus includes an *“unprecedented reference to **transitioning away from all fossil fuels in energy systems... in this critical decade** to enable the world to reach Net Zero Emissions by 2050, in keeping with the science”* (our emphasis).

- 4.3 In a landmark agreement to bring a sectoral approach to the COP Process, the ‘global stocktake’ called on all parties to, inter alia, transition away from fossil fuels, to triple renewables and double energy efficiency globally by 2030; and peak global emissions by 2025.

- 4.4 The UK was one of 118 countries to sign a pledge to treble renewables to 11TW by 2030.

The Paris Agreement (2016)

- 4.5 The UK commitment to the reduction of greenhouse gas emissions through the ratification of the United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement in November 2016. The Paris Agreement committed its signatories to *“hold the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels”*. The agreement, that was adopted by nearly every nation, also made it clear that the global economy will need to be zero-carbon by the second half of the 21st Century.

- 4.6 After the commitments made in the Paris Agreement several research studies have suggested that at current rates of action by Governments around the world the average global temperatures are still likely to increase above 2°C. Further action is rapidly required to reduce global temperature rises.

Intergovernmental Panel on Climate Change Sixth Assessment Report: Climate Change 2022

- 4.7 The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report consists of three Working Group contributions and a Synthesis Report. The Working Group 1 contribution was finalised in August 2021; the Working Group 2 contribution in February 2022; and the Working Group 3 contribution in May 2022. These reports assess the physical science basis of Climate Change; the Impacts, Adaptation and Vulnerability; and the Mitigation of Climate

Change. Taken together, the multiple lines of scientific evidence confirm that the climate is changing due to human influence. The reports make, *inter alia*, the following points:

- Global Green House Gas emissions are projected to peak between 2020 and at the latest before 2025 in global modelled pathways that limit warming to 1.5°C with no or limited overshoot and in those that limit warming to 2°C and assume immediate action... Without a strengthening of policies beyond those that are implemented at the end of 2020, Green House Gas emissions are projected to rise beyond 2025, leading to a median global warming of 3.2°C [2.2 to 3.5°C] by 2100.
- The global energy system is the largest source of CO₂ emissions. Warming cannot be limited to well below 2°C without **rapid and deep reductions in energy system CO₂ and Green House Gas emissions** (our emphasis). Multiple energy supply options are available to reduce emissions over the next decade
- Human-induced climate change is already affecting many weather and climate extremes in every region across the globe; the increased frequency and intensity of hot extremes, marine heatwaves, heavy precipitation, agricultural and ecological droughts in some regions, and proportion of intense tropical cyclones, as well as reductions in Arctic sea ice, snow cover and permafrost.
- Global surface temperature will continue to increase until at least the mid-century under all emissions scenarios considered. Global warming of 1.5°C and 2°C will be exceeded during the 21st century **unless deep reductions in CO₂ and other greenhouse gas emissions occur in the coming decades**. (our emphasis)
- Stringent emissions reductions at the level required for 1.5°C and 2°C are achieved through the ‘increased electrification of buildings, transport, and industry, consequently **all pathways entail increased electricity generation**’. (our emphasis)
- All global modelled pathways that limit warming to 1.5°C with no or limited overshoot, and those that limit warming to 2°C involve **rapid and deep and in most cases immediate GHG emission reductions in all sectors**. Modelled mitigation strategies to achieve these reductions include, *inter alia*, ‘*transitioning from fossil fuels... to very low or zero-carbon energy sources, such as renewables*’. (our emphasis)

- It is unequivocal that human influence has warmed the atmosphere, ocean and land. The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years.
- A low-carbon energy transition will shift investment patterns and create new economic opportunities. Some mitigation options can provide more immediate and cost-effective emissions reductions than others, but a **comprehensive approach** will be required **over the next ten years to limit warming to well below 2°C**. (our emphasis).

4.8 From a physical science perspective, the IPCC outline limiting human-induced global warming to a specific level requires limiting cumulative CO₂ emissions, **reaching at least net zero CO₂ emissions**, along with strong reductions in other greenhouse gas emissions. Strong, rapid and sustained reductions in nitrogen emissions would also limit the warming effect.

4.9 With a high level of confidence, the IPCC conclude the 'Emissions pathways that reach and sustain net zero Greenhouse Gas emissions defined by the 100-year global warming potential are projected to result in a decline in surface temperature after an earlier peak'. Achieving net zero emissions is therefore **essential** to limiting future Climate Change.

National Context

4.10 The objectives of the UK renewable energy policies are in accordance with the overall international policy objectives. These are focused on several key climate change challenges, which include:

- The reduction of CO₂ emissions to tackle climate change;
- The promotion of competitive energy markets in the UK;
- Affordability to customers; and
- Security of decentralised energy supplies.

4.11 This support is rooted in the Government's policy of growing the economy in a decarbonising way and achieving its legally binding target of net-zero greenhouse gas emissions by 2050¹

¹ Climate Change Act 2008 (2050 Target Amendment) Order 2019

following a national climate emergency being declared by UK Parliament in May 2019 building upon the previous target to reduce greenhouse gas emissions by at least 80% relative to 1990 levels by 2050.

- 4.12 In the years since there have been several pivotal publications released by the Government and its advisors in response to achieving the net-zero target, with the Government rapidly seeking to transition from a traditionally fossil fuel dependent economy to increasing amounts of secure, resilient renewable and low carbon energy, supported by energy storage projects. The most recent are provided below.

Future Energy Scenarios (July 2023)

- 4.13 Published by National Grid ESO in July 2023, Future Energy Scenarios (FES) represent a range of different, credible ways to decarbonise our energy system by 2035 as we strive towards the 2050 Net Zero target.
- 4.14 The report is clear that “The report is clear that “Our 2023 Future Energy Scenarios highlight one key overall theme – we must act now to achieve a clean, secure and fair energy system for all. If we don’t, a once in a lifetime opportunity will pass us by”.
- 4.15 Electricity storage capacity increases in all scenarios to ensure peak demand can be met reliably as an increasing proportion of electricity is generated from weather dependent renewables. Battery storage will make up the largest share of storage power capacity in all scenarios by 2050 to help with shifting demand within the day and managing network constraints.
- 4.16 Electricity storage will need to increase significantly to support the decarbonisation of our electricity system, with as much as twelve-fold and seven-fold increases in capacity (GW) and volume (GWh) respectively from 2021 to 2050.

British Energy Security Strategy (April 2022)

- 4.17 The ‘British energy security strategy’ builds on the ‘Ten point plan for a green industrial revolution’ and the ‘Net Zero Strategy’. This strategy was prepared in response to rising global energy prices, provoked by surging demand after the pandemic as well as conflict in Eastern Europe.
- 4.18 The Strategy States “Accelerating the transition away from oil and gas then depends critically on how we can roll out new renewables... The growing proportion of our electricity coming

from renewables reduces our exposure to volatile fossil fuel markets. Indeed, without the renewables we are putting on the grid today, and the green levies that support them, energy bills would be higher than they are now. **But we have to be bolder in removing the red tape that holds back new clean energy developments and exploit the potential of all renewable technologies**” (our emphasis).

4.19 Under the heading ‘Networks, storage and flexibility’ the strategy states:

- Within this decade, our modern system will prioritise two key features: anticipating need because planning ahead minimises costs and public disruption; and hyper-flexibility in matching supply and demand so that minimal energy is wasted. This more efficient, locally responsive system could bring down costs by up to £10 billion a year by 2050.
- Encouraging all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment.

UK Climate Change Risk Assessment 2022 (January 2022)

4.20 As required by the Climate Change Act 2008, the UK government has undertaken the third five-year assessment of the risks of climate change on the UK. This is based on the Independent Assessment of UK Climate Risk, the statutory advice provided by the Climate Change Committee (CCC), commissioned by the UK government and devolved administrations.

4.21 The report is clear that “climate change is happening now. It is one of the biggest challenges of our generation and has already begun to cause irreversible damage to our planet and way of life. We have clear evidence demonstrating the pace of warming in recent decades and the impacts we will face should this continue. As we redouble our efforts to achieve net zero, we must also continue to raise ambitions on adaptation to ensure the UK is resilient to the challenges of a warming world” and that “To achieve net zero, we must integrate adaptation action into mitigation efforts. Successful mitigation will in turn ensure adaptation remains achievable. This includes the need to ensure our increasingly electrified power system, nature-based solutions and other low carbon infrastructure are resilient to future climate impacts”.

Independent Assessment: The UK’s Net Zero Strategy (October 2021)

- 4.22 The Committee for Climate Change (CCC) have published their response to the Net Zero Strategy, In this assessment they independently appraise the Government’s ambitions, its proposed policies to deliver these (both across the economy and in the major emitting sectors), areas that will require further detail and clarification, and the next steps required to proceed to implementation.
- 4.23 The CCC’s overall assessment is that it is an ambitious and comprehensive strategy that marks a significant step forward for UK climate policy, setting a globally leading benchmark for COP26. Further steps will however need to follow quickly to implement the policies and proposals mapped out in the Net Zero Strategy if it is to be a success, which include a Net Zero Test “to ensure that **all policy and planning decisions are consistent with the path to Net Zero**” (our emphasis).

Net Zero Strategy: Build Back Greener (October 2021)

- 4.24 The UK’s new Net Zero Strategy sets out, for the first time, how the UK Government plans to deliver its emissions targets of Net Zero in 2050 and a 78% reduction from 1990 to 2035 (-63% relative to 2019). It puts forward an achievable and affordable vision that will bring net benefits to the UK.
- 4.25 Whilst there are a range of ways in which net zero could be achieved in the UK, the Strategy sets out a delivery pathway showing indicative emissions reductions across sectors to meet targets up to the sixth carbon budget (2033-2037).
- 4.26 The policies and proposals for power in the Net Zero Strategy state that:
- “The net zero economy **will be underpinned by cheap clean electricity, made in Britain**. A clean, reliable power system is the foundation of a productive net zero economy as we electrify other sectors – **so we will fully decarbonise our power system by 2035**, subject to security of supply. Our power system will consist of abundant, **cheap British renewables**, cutting edge new nuclear power stations, and be underpinned by **flexibility including storage**, gas with CCS, hydrogen and ensure reliable power is always there at the flick of a switch. The transformation of the power sector will bring high skill, high wage job opportunities right across the UK” (our emphasis).
- 4.27 The key policies include “40GW of offshore wind by 2030, with more onshore, solar, and other renewables” and “Deployment of new flexibility measures including storage to help smooth out future price spikes”.

- 4.28 Although the Energy White Paper published December 2020 envisaged achieving an overwhelmingly decarbonised power system during the 2030s, the Government have since increased their ambition further. *“By 2035, all our electricity will need to come from low carbon sources, subject to security of supply, bringing forward the government’s commitment to a fully decarbonised power system by 15 years, whilst meeting a 40-60% increase in demand. However, the Energy White Paper’s fundamental approach remains unchanged. A low-cost, net zero consistent electricity system **is most likely to be composed predominantly of wind and solar generation, whether in 2035 or 2050**”* (our emphasis).

Well-being of Future Generations (Wales) Act 2015

- 4.29 The Well-being of Future Generations (Wales) Act 2015 gives a legally-binding common purpose (the seven well-being goals) for national government, local government, local health boards and other specified public bodies. It details the ways in which these bodies must work, and work together, to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.
- 4.30 Paragraph 5(1) of The Well-being of Future Generations (Wales) Act 2015 sets out that public bodies “must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”.

Welsh Government’s Net Zero Strategic Plan – September 2022

- 4.31 This Strategic Plan sets out 54 initiatives that provide the foundation for the Welsh Government to progress towards net zero. The initiatives cover the entire Welsh Government organisation, from the operation of buildings, travel, procurement of goods and services, and future ways of working.
- 4.32 The report states “the scale of change needed is transformative – energy and resource efficiency upgrades, renewable heat & power, switching to more sustainable materials and moving to a zero emissions fleet will all need to be effectively deployed. Alongside this, we need efficient operations, low carbon procurement practice, and support for our staff at home and commuting to progressively decarbonise. Building on our existing work, we must now put these strategic initiatives into action”.
- 4.33 The following publications are also of relevance to the Proposed Development.
- Transitioning to a net zero energy system (July 2021)

- The report states that increased flexibility provides significant cost savings in a decarbonised power sector; increased system flexibility provided system cost reduction of up to £10bn per year in 2050 at a 5g/kWh emission intensity. The cumulative value (from 2020 to 2050) of increased flexibility based on illustrative pathways to net zero could reduce system costs between £30-70bn across that period (2012 prices, discounted). It will be very difficult to achieve the deep power sector decarbonisation needed to achieve the sixth Carbon Budget without significantly higher levels of system flexibility.
- 2021 Progress Report to Parliament (June 2021)
 - The UK will become heavily dependent on electricity as our dominant energy source as we reduce our greenhouse gas emissions to Net Zero. While electricity provides about 15-20% of our energy today, by 2050 it could account for 55-65%, used for light, heat, communications, transport, industry and delivery of other critical services such as water. This is alongside a potential increased reliance on renewables for electricity generation to 80% by 2050². This will necessitate the development of new energy infrastructure, energy supplies will need to become increasingly resilient to climate change and interdependencies will need to be better understood and managed.
- Energy White Paper (December 2020)
 - The report sets out a clear position of support for energy storage ‘to promote energy storage innovation, we will further accelerate the commercialisation of innovative technologies, excluding proven technologies such as lithium ion and pumped hydro storage. Our support will build on the success of previous funding under the current Energy Innovation Programme.’
- The Sixth Carbon Budget (December 2020)
 - Increase in renewable generation will lead to additional system requirements, particularly to ensure security of supply. Surplus electricity could be used for short to medium-term storage, exports, or hydrogen

² Under the CCC’s Balanced Pathway to Net Zero from the Sixth Carbon Budget Report.

production. In turn these services could help support security of supply in a daily or seasonal capacity when renewable output is low.

- ‘Net Zero – The UK’s contribution to stopping global warming advice report (2019)’
 - The Committee on Climate Change sets out that low-carbon electricity must quadruple by 2050 if the net-zero target is to be achieved. Battery storage (of energy generated by renewables) will be vital to provide flexibility on the transmission and distribution networks as the demands on the electricity grid change in the next three decades.

Local Context

Decarbonisation and the Nature Emergency

- 4.34 At a local level, PCC consider that decarbonisation and the nature emergency well-being objective will make a particular contribution to the following national well-being goals:
- A resilient Wales; and
 - A globally responsible Wales.
- 4.35 As part of the Corporate Strategy 2023-2028 ‘Decarbonisation and the Nature Emergency’ policy A5 states the Council will ‘promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency.
- 4.36 PCC consulted upon the ‘Big Green Plan’ in early 2022 which set out the ambition to be carbon neutral as an organisation by 2030 and state that ‘climate change and the nature emergency go hand in hand’.

5. PLANNING POLICY CONTEXT

National

Overarching National Policy Statement for Energy (EN-1)

- 5.2 National Policy Statement EN-1 outlines the policy context for the development of nationally significant energy infrastructure explains the *“urgent need for significant amounts of large-scale energy infrastructure in meeting the government’s energy infrastructure”*.
- 5.3 Paragraph 2.3.3 is clear that the “objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050”. Paragraph 2.3.4 continues, stating *“Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level”*.
- 5.4 Electricity meets a significant proportion of our overall energy needs and our reliance on it will increase as we transition our energy system to deliver our net zero target. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.
- 5.5 Storage is identified in Paragraph 3.3.25 as having 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 3.3.26 states that *“storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the National Grid and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases”*.
- 5.6 In terms of good design for energy infrastructure, Draft EN-1 makes clear that good design goes beyond visual appearance and landscape fit. It states *“The functionality of an object - be it a building or other type of infrastructure - including fitness for purpose and sustainability, is equally important. Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in*

their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area”.

Future Wales: The National Plan 2040

- 5.7 Future Wales is the national development framework, setting the direction for development in Wales to 2040. It sets out a “strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities”.
- 5.8 As the national development framework, Future Wales is the highest tier of development plan and is “*focused on solutions to issues and challenges at a national scale*”. It does not allocate land for development or include policies on land uses but is a framework on which Local Development Plans can be built upon.
- 5.9 Under the heading ‘Climate Change’ Future Wales states:

“The climate is already changing... trends show the UK climate is continuing to warm and sea levels continue to rise. In terms of the future... the projections show an increased chance of milder, wetter winters and hotter, drier summers, rising sea levels and an increase in the frequency and intensity of extreme weather events.

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

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

It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the

planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.”

- 5.10 On the subject of the Low Carbon Economy and Renewable Energy, Future Wales states “we must focus on **delivering clean growth** aim and preparing the Welsh economy for the markets of the future and demand for low carbon goods and services” and “Wales can become a world leader in renewable energy technologies... our commitment to ensuring the planning system provides a strong lead for renewable energy development, means we are well placed to **support the renewable sector, attract new investment and reduce carbon emissions**”. (our emphasis)
- 5.11 Future Wales explicitly states the need for BESS developments, stating “The UK’s energy system is now undergoing significant change, with energy generation and delivery becoming more distributed in the communities and regions where the energy is used. The boundaries between systems are also becoming blurred, **with energy being converted into (and stored in) different forms** to address a range of needs. **There is also a need to consider large-scale energy storage as part of the energy system** to provide grid balancing.” (our emphasis)
- 5.12 Policy 17 of Future Wales ‘Renewable and Low Carbon Energy and Associated Infrastructure’ states, inter alia, that “The Welsh Government **strongly supports the principle of developing renewable and low carbon energy from all technologies** and at all scales to meet our future energy needs. 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”. (our emphasis)
- 5.13 When discussing the role of Strategic Development Plans, Future Wales sets out that “Decarbonisation and **responding to the threats of the climate emergency should be central** to all regional planning”. (Our emphasis)

Planning Policy Wales – Edition 11

- 5.14 Planning Policy Wales Edition 11 (‘PPW’) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together provide the national planning policy framework for Wales. The primary objective of PPW is to “*ensure the planning system contributes towards the delivery of sustainable development and improves the social,*

economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well functioning planning system is fundamental for sustainable development and achieving sustainable places."

- 5.15 The document references the seven goals of the well-being and future generations act; in particular "Above all, a Globally Responsible Wales is promoted by reducing our carbon footprint through integrated public transportation infrastructure, encouraging globally responsible business and the promotion of renewable energy over carbon-emitting sources and resource choices through which multiple benefits can be realised."
- 5.16 Under the heading 'Environmental Sustainability', paragraph 3.7 sets out that development should "seek to maximise energy efficiency and the efficient use of other resources **(including land)**, maximise the sustainable movement, **minimise the use of non-renewable sources, encourage decarbonisation** and prevent the generation of waste and pollution". **(our emphasis)**
- 5.17 Paragraph 3.44 sets out that the search process and identification of development land must be undertaken in a manner that fully complies with the requirements of all relevant national planning policy.
- 5.18 Paragraph 3.60 confirms that new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled and all new development should be of a scale and design that respects the character of the surrounding area.
- 5.19 Section 5 'Productive and Enterprising Places' covers the economic components of placemaking. Productive and Enterprising Places are those which promote economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development.
- 5.20 Under the heading 'Productive and Enterprising Trends and Issues' one of the key issues identified is "embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, **decentralised renewable energy systems, the increased use of energy storage to balance supply and demand** and the challenge this creates on our distribution networks". **(our emphasis)**

- 5.21 Section 5.7 of PPW covers the topic of Energy. Paragraph 5.7.1 states “The Welsh Government’s highest priority is to reduce demand wherever possible and affordable. Low carbon electricity must become the main source of energy in Wales... The future energy supply mix will depend on a range of established and emerging low carbon technologies”.
- 5.22 Paragraph 5.7.2 continues, stating “In order to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. **The system will need to integrate renewable generation with storage and other flexibility services**, in order to minimise the need for new generation and grid system reinforcement”. **(our emphasis)**
- 5.23 Paragraph 5.7.6 confirms the planning system should “secure an appropriate **mix of energy provision**, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government’s aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, **recognising the importance of decarbonisation and the sustainable use of natural resources**, both as an economic driver and a commitment to sustainable development”. **(our emphasis)**
- 5.24 Paragraph 5.7.7 sets out the various ways the planning system should bring forward the energy transition which includes, *inter alia*, the following:
- Optimise energy storage;
 - Optimise the location of new developments to allow for efficient use of resources;
 - Maximise renewable and low carbon energy generation; and
 - Move away from the extraction of energy minerals, the burning of which is carbon intensive.
- 5.25 Paragraph 5.7.8 specifically relates to energy storage, stating “Energy storage has an **important part to play in managing the transition to a low carbon economy**. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and **energy storage can help balance supply and demand**. Proposals for new storage facilities **should be supported wherever possible**”. **(our emphasis)**
- 5.26 Paragraph 5.8.1 confirms the planning system should support new development that “supports decarbonisation, tackles the causes of the climate emergency, and adapts to the

current and future effects of climate change through the incorporation of effective mitigation and adaptation measures”.

5.27 Paragraph 5.9.1 sets out PPW support for renewable energy stating “Local authorities should facilitate all forms of renewable and low carbon energy development and should seek cross department co-operation to achieve this. In doing so, **planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is maximised** and renewable energy targets are achieved”. (our emphasis)

5.28 Under the heading ‘Development Management and Renewable and Low Carbon Energy’ paragraph 5.9.20 sets out how planning authorities should identify and require suitable ways to avoid, mitigate or compensate adverse impacts of development. Development proposals should take into account:

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

Technical Advice Notes

5.29 The Technical Advice Notes (TANs) provide detailed planning advice which Local planning authorities must take into account when preparing development plans.

TAN 11: Noise

5.30 This note provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main

considerations which local planning authorities should take into account in drawing-up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

- 5.31 Local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.

TAN 15: Development and Flood Risk

- 5.32 TAN 15 provides technical guidance to supplement the policy set out within Planning Policy Wales in relation to development and flooding. The guidance relates to sustainability principles and provides a framework to allow risks arising from river flooding, coastal flooding and additional run off from developments to be assessed.
- 5.33 In relation to flood risk, TAN 15 indicates that the Assembly has a duty to ensure that development is sustainable and does not create problems for future generations. Managing flooding has an important role to ensure sustainable development by: guiding developments to locations with little or no risk from river, tidal or coastal flooding, managing consequences of flooding where developments can be justified and making provision for climate change.
- 5.34 In December 2021, the Welsh Government released a new TAN 15 which is due to become adopted policy advice on 1 June 2023. This new national strategy is set to recognise the degrees of flooding in the present day and in the future. Although the emerging TAN 15 is yet to be adopted, reference has been made to the requirements of the emerging document in the Flood Consequences Assessment submitted in support of this application.

TAN 18: Transport

- 5.35 This note identifies the planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development, in particular climate change and the outcomes identified in the Assembly Government's Environment Strategy. Integration can help the Assembly Government achieve these environmental outcomes together with its wider sustainable development policy objectives by, *inter alia*, managing parking provision, and ensuring that transport infrastructure or service improvements necessary to serve new development allow existing transport networks to continue to perform their identified functions.

TAN 23: Economic Development

- 5.36 TAN 23 deals predominantly with the “B-classes of development (the traditional land use B1-B8 classes of development. However, more generally, it states that *“Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development”*.

TAN 24: The Historic Environment

- 5.37 This document provides guidance on how the planning system considers the historic environment for decision making and planning and Listed Building applications. It provides specific guidance on how impacts on historic features, including Listed Buildings, should be considered.
- 5.38 TAN 24 confirms it is for the local planning authority to consider the effects of proposed developments within the settings of listed buildings, conservation areas, unscheduled monuments of national importance and other undesignated historic assets.

Local

Development Plan

- 5.39 The site is located within the jurisdiction of Pembrokeshire County Council as the Local Planning Authority and determining authority for this application. The Local Development Plan (‘LDP’) for the purposes of determining the application for the proposed development on this site is ‘Planning Pembrokeshire’s Future’ adopted on 28 February 2013.
- 5.40 LDP Policy SP1 ‘Sustainable Development’ states all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. The supporting text to this policy echoes the national policy position of a presumption in favour of sustainable development.
- 5.41 LDP Policy GN.1 ‘General Development Policy’ provides a framework for evaluation of development impacts and confirms that development will be permitted where the following criteria are met:

- 1) *The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;*

- 2) *It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;*
- 3) *It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;*
- 4) *It respects and protects the natural environment including protected habitats and species;*
- 5) *It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;*
- 6) *Necessary and appropriate service infrastructure, access and parking can be provided;*
- 7) *It would not cause or result in unacceptable harm to health and safety;*
- 8) *It would not have a significant adverse impact on water quality; and*
- 9) *It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.*

5.42 In the countryside, proposals must demonstrate that such a location is necessary for the development and that the nature of the proposal is appropriate within a rural area. The scale, nature and siting of a proposal must be appropriate to the location proposed and must not undermine the character of either the site or the locality.

5.43 LDP Policy GN.2 'Sustainable Design' states that development will be permitted where relevant criteria are met including, *inter alia*, it is of a good design which pays due regard to local distinctiveness and contributes positively to the local context; It is appropriate to the local character and landscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements; and it incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions.

- 5.44 LDP Policy GN.3 confirms the viability of a development will be a key consideration when securing planning, and measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance.
- 5.45 LDP Policy GN.4 'Resource Efficiency and Renewable and Low-carbon Energy Proposals' states *"Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported"*. The supporting text sets out how General resource efficiency of energy, heat and water is an important element of good design. Minimising resource demand has huge benefits, including assisting meeting UK targets to tackle climate change, reducing pressure on local resources such as water reserves and reducing long term running costs to individual householders. In addition, work undertaken by Welsh Government has demonstrated *"the potential for renewable energy to contribute to the energy needs of major developments in Pembrokeshire... Pembrokeshire has significant potential to provide further energy from all renewable sources, building on its existing role as an energy centre."*
- 5.46 The supporting text to Policy GN.4 states "The sites for these proposals do not necessarily have to be directly linked to new development proposals, but **major schemes will often require a functional link between the source of power and a user for the end product and / or the National Grid**" (our emphasis).
- 5.47 LDP Policy GN.10 'Farm Diversification' sets out that "diversifying the range of economic activities on a farm will be permitted where... (inter alia) the proposed use helps to support the continued agricultural operation of the farm".
- 5.48 LDP Policy GN.37 'Protection and Enhancement of Biodiversity' states "All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures".
- 5.49 LDP Policy GN.38 'Protection and Enhancement of the Historic Environment' states "Development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their setting, will only be permitted where it can be demonstrated that it would protect or enhance their character and integrity".

Supplementary Planning Guidance

5.50 The following Supplementary Planning Guidance (SPG) relevant to the application are:

- *Biodiversity SPG (May 2021)* – to provide guidance to everyone involved with development proposals on legal responsibilities, obligations and the protection, conservation and enhancement of biodiversity during the development process.
- *Historic Environment (Archaeology) SPG (May 2021)* – provides detailed information regarding how planning applications with the potential to impact upon archaeology within Pembrokeshire will be dealt with. It also provides information on the way in which Development Plan policies will be applied.
- *Renewable Energy SPG (October 2016)* – elaborates on Plan policies seeking to balance the benefits that renewable energy development can have against the need to protect the natural and historic environment. It focuses primarily on solar, wind and biomass energy. However many of the planning principles and considerations are equally applicable to other renewable energy technologies.

Material Considerations

Planning for Renewable and Low Carbon Energy – A Toolkit for Planners

- 5.51 The Welsh Government commissioned the preparation of the “Toolkit” to support local authorities in planning for the development required to meet energy and emissions targets.
- 5.52 “Low carbon” is defined as “a range of energy sources that are not renewable, but can still produce less carbon than use of the conventional electricity grid or gas network, and are therefore considered an important part of decarbonising the energy supply”.

6. PLANNING APPRAISAL

- 6.1 In determining an application for planning permission a decision maker is required by section 70(2) of the 1990 Act to have regard to the provisions of the development plan so far as material to the application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that a determination *“must be in accordance with the plan unless material considerations indicate otherwise”*.
- 6.2 The Courts have determined that it is enough that a proposal accords with the Development Plan when considered as a whole. It is therefore not necessary to accord with every policy contained within the PCC Development Plan. Indeed, it is not at all unusual for Development Plan policies to pull in different directions³.
- 6.3 The local development plan for the purposes of determining the application for the proposed development on this site is the ‘Planning Pembrokeshire’s Future’ plan insofar it is consistent with Planning Policy Wales.
- 6.4 The primary objective of PPW is to ensure the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
- 6.5 This section contains a detailed analysis of the Proposed Development against the identified relevant national and local planning policies and any other material planning considerations. The key issues for the determination of this application are:
- The principle of the development;
 - Landscape and visual;
 - Flood risk;
 - Biodiversity;
 - The historic environment;
 - Impacts on amenity;

³ Laura Cummins and London Borough of Camden, SSETR and Barrett Homes Limited [2001]; R. v Rochdale MBC ex parte Milne [2000] & City of Edinburgh Council v. Secretary of State for Scotland [1997]

- Construction traffic and access;
- Other relevant considerations; and
- Benefits

The Principle of The Development

- 6.6 The Proposed Development comprises a Battery Energy Storage System of less than 350 MW; the responsibility to determine such an application falls to the Local Planning Authority.
- 6.7 The Proposed Development will provide instantaneous energy balancing services to the National Grid; it would enable the storage of electricity at times of low demand, or excess renewable energy generation, which can then be deployed at times of higher demand, maximising the output of renewable energy available on the National Grid, whilst providing security of electricity supply to Wales.
- 6.8 National and local policy is strongly supportive of renewable and low carbon energy as a means of meeting our increasing energy demands, tackling climate change and transitioning to a prosperous, low carbon economy. Privately funded, large scale energy storage such as the Proposed Development are recognised as being not just necessary but central to meeting an urgent need. Moreover, the Proposed Development will help to address the intermittency issues associated with renewables generally and further relegate the role of fossil fuels to a 'back-up' role.
- 6.9 The urgency of the need for substantially greater quantities of low carbon and renewable energy (which includes energy storage) is self-evident considering the recent dramatic step change in UK Government energy policy driven by its declared Climate Emergency to achieve a 100% reduction in greenhouse gas emissions by 2050 (net zero). Since declaring a climate emergency in 2019, and responding to advice from the Climate Change Committee, Wales has legislated to reduce greenhouse gas emissions to net zero by 2050. These are both legally binding.
- 6.10 The 'Sixth Carbon Budget' and '2021 Progress Report to Parliament' prepared by the Committee on Climate Change makes it clear that the utmost focus is required from Government over the next ten years. If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge - the UK

will not deliver net zero by 2050. The 2020s must be the decisive decade of progress and action.

- 6.11 The Sixth Carbon Budget demonstrates that in the recommended 'Balanced Net Zero Pathway' assumes 18 GW of battery storage capacity by 2035; currently the UK has around 2 GW of battery storage capacity. A significant increase in number of battery storage sites is required urgently in the next decade. The Proposed Development would contribute significantly to meeting these targets.
- 6.12 At a local level, as part of the Corporate Strategy 2023-2028 'Decarbonisation and the Nature Emergency' policy A5 states the Council will promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency. It is clear, therefore, that PCC is aware of the significant changes associated with climate change and reaching net zero.
- 6.13 PCC consulted upon the 'Big Green Plan' in early 2022 which set out the ambition to be carbon neutral as an organisation by 2030 and state that "*climate change and the nature emergency go hand in hand*".
- 6.14 Policy GN.4 states developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported. The application documents submitted in support of the application demonstrate how the Proposed Development is acceptable in environmental terms.
- 6.15 The primary objective of PPW is to ensure that "the planning system contributes towards the delivery of sustainable development". PPW supports the principle of renewable energy, stating "the benefits of renewable and low carbon energy, as part of the overall commitment to **tackle climate change and increase energy security, is of paramount importance**". (our emphasis)
- 6.16 PPW makes it clear "the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes".
- 6.17 Policy 17 of Future Wales 'Renewable and Low Carbon Energy and Associated Infrastructure' states, inter alia, that "The Welsh Government **strongly supports the principle of developing**

renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. 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". (**our emphasis**)

- 6.18 It goes on to state that "new strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities".
- 6.19 The Proposed Development is clearly a form of sustainable development; it contributes towards the transition to a net zero economy; it will provide jobs during construction and operation; and will secure additional investment into Pembrokeshire. In applying the relevant national and local policy, and upon reviewing all material consideration, the Proposed Development is consistent with both national and local objectives and policies when read as a whole.

Landscape and Visual

- 6.20 The likely landscape and visual impacts of the Proposed Development have been fully assessed within the Landscape and Visual chapter in the Environmental Statement.
- 6.21 Landscape and visual effects have been assessed through professional judgements on the sensitivity of landscape character and landscape features, as well as visual receptors and representative viewpoints identified within the baseline study, combined with the predicted magnitude of change arising from the proposals.
- 6.22 The visibility of the Site is limited to the immediate periphery and influenced by the interplay of topography and dense vegetation that surrounds the BESS Site. Field work was carried out in November 2023 to record a range of potential views representing a range of receptor groups within the study area, including PRoW users, other footpath users and road users. The assessment of visual receptors concludes that the Proposed Development will not result in significant effects on visual amenity at representative viewpoints towards the BESS Site from the study area during any phase of the Proposed Development.
- 6.23 Regarding the cumulative schemes, the wider landscape benefits from a comprehensive existing green infrastructure network, which when combined with intervening topography and built form, often filters and curtails views, especially those within and across the landscape near the Site. Due to the limited effects upon landscape character, limited visibility

of the Proposed Development, and the relationship of the Proposed Development to cumulative schemes, it is concluded that no significant cumulative landscape or visual effects would arise.

- 6.24 The Detailed Landscape Design sets out the planting strategy for the Proposed Development, including new tree and scrub planting around the BESS to provide enclosure and improve visual impacts, with riparian planting within the surface water attenuation feature to provide biodiversity benefits.
- 6.25 Overall, the total extent of the landscape and visual effects would be localised and limited in nature. The proposed planting responds to the requirements of local policies SP16 and GN.1, chapter 7 of PPW and TAN considerations. The planting provides landscape, ecological and amenity benefits and therefore delivers on the policy requirements.

Flood Risk

- 6.26 A Flood Consequences Assessment (FCA) has been prepared in support of the Proposed Development. The aim of the FCA is to outline the potential for the site to be impacted by flooding, the impacts of the proposed development on flooding in the vicinity of the site, and the proposed measures which could be incorporated into the development to mitigate the identified risk.
- 6.27 Although the updated TAN 15 is yet to be adopted, it would likely be applicable to consideration of the Proposed Development. Therefore, reference has been made to the emerging TAN 15 and the new mapping has been included in the FCA. Reference has also been made to, *inter alia*, the CIRIA SuDS manual (C753), the PCC Preliminary Flood Risk Report, the PCC Strategic Flood Consequence Assessment and the PCC Local Flood Risk Management Strategy.
- 6.28 The FCA demonstrates the Proposed Development has a low risk of flooding from all assessed sources and will be safe from flooding for the life of the project. The site is not at risk from sea flooding. The Development will not increase the risk of flooding on site or elsewhere.
- 6.29 With regards to surface water drainage, an attenuation pond will store surface water for all events up to and including the 1 in 100-year plus 40% climate change event for gradual release.

- 6.30 The FCA addresses all the requirements set out in Policies GN.2 and GN.3, and the appropriate justification test under TAN 15. Overall, it has been demonstrated that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the proposed drainage system.

Ecology and Biodiversity

- 6.31 The likely landscape and visual impacts of the Proposed Development have been fully assessed within the Ecology chapter of the Environmental Statement and supporting PEA. This sets out the ecological baseline conditions within and adjoining the Proposed Development, including the temporary working areas, and the impacts associated with the construction and operation of the Proposed Development on biodiversity and nature conservation.
- 6.32 The Site is located within a field of sown pasture with an even sward dominated by perennial ryegrass, surrounded by field boundary hedgerows, with tree planting on the southern boundary. A narrow watercourse within a wooded strip forms the south-western boundary of the BESS.
- 6.33 Habitat features along the cable route include hardstanding, reseeded grassland, improved grassland, arable farmland and semi-improved grassland, separated by scrub and hedgerows of varying quality and species variety (predominantly blackthorn, hawthorn and bramble with occasional willow and rare occurrences of gorse).
- 6.34 The Proposed Development has been designed to maintain and enhance biodiversity, in line with the requirements under the Environment (Wales) Act 2016. Features include:
- New native tree planting within the Site and in field margins;
 - Wet grassland and riparian planting within the SuDS feature in order to create an ecological feature;
 - New native buffer planting around the BESS to encourage ecological connections;
 - Natural grassland across much of the Site; and
 - Native scrub planting to encourage a diverse habitat and features for local fauna.
- 6.35 Overall, the project achieves an improvement on the biodiversity baseline and therefore accords with policy GP5.

The Historic Environment

- 6.36 The likely impacts of the Proposed Development on the known and potential heritage and archaeology resources near the Site and the surrounding area has been assessed within the Heritage Statement submitted in support of the Proposed Development.
- 6.37 No built heritage assets within the wider environs of the Site have been identified as sensitive to the change resulting from the proposals. The proposals would meet any built heritage planning or legislation requirements that may be associated with the Site, and built heritage matters should not be considered a constraint to development.

Impact on Amenity

- 6.38 Policy GP7 states that development will not be permitted which would cause or result in unacceptable harm to health because of, *inter alia*, noise or light pollution or any other identified risk to environment, local amenity or public health and safety.

Air Quality

- 6.39 There will be no emissions from the batteries and construction impacts will be temporary.

Noise

- 6.40 The batteries are cooled by a fan-cooled unit which only run in certain circumstances. The typical optimum operating temperature for batteries is 5C to 25C. If the batteries are operating (discharging) and the ambient temperature goes above 25C then the cooling system will operate. This is normally in the summer when temperatures are warmer, and during the day when temperatures are warmer than during the night. Cooling is not required when the batteries are charging. Under normal operating conditions, the cooling fans will not typically operate every day or during night-time hours.
- 6.41 In summary, impacts of noise during the construction and operational phase will be temporary and not significant. Due to the separation distance and intervening geographical features, the impacts on amenity of the nearest residential receptors and operational use of the nearest non-residential receptors will not be compromised.
- 6.42 A Noise Impact Assessment has been submitted in support of the application that assess the operational noise of the final scheme having regard to nearby receptors. The Proposed Development has been assessed on the basis of worst-case maximum operational conditions.

- 6.43 The Proposed Development will comply with the requirements of TAN 11, which gives advice on how the planning system can be used to minimise the adverse impact of noise, without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens. It is anticipated that noise emissions from the Site would be controlled by planning condition to ensure the amenity of nearby users are preserved.

Lighting

- 6.44 Security lighting will be provided within the 132kV substation compound. All lighting will be oriented into the site to avoid lighting spill outside of the BESS area.
- 6.45 Within the Site, lighting will be controlled by passive infra-red sensors so that, for example during maintenance at times of darkness, only the necessary lighting needed for that task is used. This further mitigates any lighting impacts and saves energy.
- 6.46 Full consideration will be given to the reduction of light pollution by following the guidance provided with the 'Institution of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light'. Lighting details can be secured at the detailed design and procurement stage and controlled by planning condition.

Construction Traffic and Access

- 6.47 A Construction Traffic Management Plan ('CTMP') has been prepared to accompany the planning application, which assesses all traffic and transport matters. The CTMP has been prepared in accordance with PPW, TAN 18 and comments received from Highway Officers as part of PCC's EIA Screening Opinion.
- 6.48 Traffic generated by the construction of the Proposed Development would utilise the same access route as previously used for operational traffic to and from the Valero refinery and the same route for two consented solar farms to the west of the Site. This route is suitable for the construction of the Proposed Development.
- 6.49 The CTMP shows there are no current road safety issues and that there would be no significant impacts. It is therefore concluded that there are no transport or highways related reasons for not permitting the construction of operation of the Proposed Development.

Other Relevant Considerations

Arboricultural Considerations

- 6.50 An Arboricultural Impact Assessment (AIA) has been prepared in support of the Proposed Development.
- 6.51 Potentially nine sections of nine separate moderate-quality hedgerows and one low-quality ash tree would need to be removed to permit the cable from the Proposed Development to Pembroke Substation. Potential losses can be avoided at the detailed design stage in collaboration with the appointed contractor.
- 6.52 Subject to the implementation of the advice contained within the AIA report the proposed development is acceptable from an arboricultural perspective. The limited loss of planting will have no wider impact beyond the site and is acceptable in arboriculture terms. Retained trees can be easily worked around during the construction process ensuring their health and longevity.
- 6.53 The application accords with local policy GN.37.

Decommissioning

- 6.54 At the end of the project's operational life, the BESS will be decommissioned and equipment with the BESS compound will be removed from the Site.
- 6.55 The batteries will be dismantled and recycled. This is because the valuable materials used in their manufacture can be used again and are unlikely to be considered as "waste" due to an ever-increasing demand. Battery recycling technology and processes continues to improve and expand in availability; it is anticipated that these improvements will continue to be refined over the coming years, with the number of battery recycling facilities growing to meet the anticipated demand.
- 6.56 Decommissioning conditions are commonly attached to such development to ensure decommissioning takes place in accordance with a scheme of decommissioning agreed with the Local Planning Authority. Typically these details are provided 6-12 months prior to the commencement of decommissioning activities. The proposed means of construction and limited nature of the intrusion required mean the BESS equipment can be easily removed.

Benefits

Supporting the increased deployment of Renewable Energy Generation

- 6.57 The Proposed Development would provide high-speed energy balancing services to the National Grid. As demonstrated extensively in Section 4, the UK and PCC have declared a

climate emergency and there is an urgent requirement for renewable energy infrastructure and storage, particularly when considered in the context of the June 2019 ambitious target to reduce greenhouse gas emissions to net zero by 2050 in accordance with the Climate Change Act 2008. BESS projects are essential to achieving these targets.

6.58 Whilst there is no requirement for an applicant to demonstrate the need for renewable or low carbon energy, both national and local energy policy makes clear that renewable and low carbon energy is vital to environmental and economic prosperity and social well-being. It is important to ensure the UK:

- Transitions to a low-carbon economy and reduces greenhouse gas emissions to address the predominant challenge of our time, climate change;
- supports an increased supply from renewables;
- continues to have secure, diverse and resilient supplies of electricity as the UK transitions to low carbon energy sources and to replace closing electricity generating capacity;
- increases electricity capacity within the system to stay ahead of growing demand at all times whilst seeking to reduce demand wherever possible; and
- delivers new low carbon and renewable energy infrastructure as soon as possible – the need is urgent.

6.59 The ‘Sixth Carbon Budget’ report prepared by the Committee on Climate Change in December 2020 and ‘Progress Report to Parliament’ (June 2021), states that the utmost focus is required from Government over the next ten years. If policy is not scaled up across every sector; if business is not encouraged to invest; if the people of the UK are not engaged in this challenge - the UK will not deliver Net Zero by 2050. The 2020s must be the decisive decade of progress and action.

6.60 The ‘UK Climate Change Risk Assessment 2022’ (January 2022) makes it clear that “climate change is happening now. It is one of the biggest challenges of our generation and has already begun to cause irreversible damage to our planet and way of life” and “to achieve net zero, we must integrate adaptation action into mitigation efforts. Successful mitigation will in turn ensure adaptation remains achievable. This includes the need to ensure our increasingly

electrified power system, nature-based solutions and other low carbon infrastructure are resilient to future climate impacts”.

- 6.61 The NPS EN-1 and PPW confirm that renewable and low carbon energy should be supported in the planning system, as part of working towards a radical reduction of greenhouse gases to tackle climate change. Local planning authorities need to maximise the potential for renewable and low carbon energy, and to approve such applications where their impacts are acceptable. This is afforded significant weight in the planning balance.

Climate Emergency and Nature Emergency

- 6.62 The urgency of the need for substantially greater quantities of low carbon and renewable energy (which includes energy storage) is self-evident. The UK Government has declared a Climate Emergency; The Welsh Government has declared a Climate Emergency, and PCC has declared a Nature Emergency. The UK must achieve a 100% reduction in greenhouse gas emissions by 2050 (net zero). Wales has legislated to reduce greenhouse gas emissions to net zero by 2050. These are legally binding commitments.
- 6.63 At a local level, PCC consider that decarbonisation and the nature emergency well-being objective will make a particular contribution to the following national well-being goals:
- A resilient Wales; and
 - A globally responsible Wales.
- 6.64 As part of the Corporate Strategy 2023-2028 ‘Decarbonisation and the Nature Emergency’ policy A5 states the Council will ‘promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency.
- 6.65 PCC consulted upon the ‘Big Green Plan’ in early 2022 which set out the ambition to be carbon neutral as an organisation by 2030 and state that ‘climate change and the nature emergency go hand in hand’.
- 6.66 The Proposed Development would make a significant and valuable contribution to achieving emission targets on a national and local level. This is afforded substantial weight in the planning balance.

Energy Security

6.67 The Proposed Development supplies stored energy to the National Grid, comprising secure, distributed and diversified energy generation which accords with the Government's policy on energy security as identified within NPS EN-1 which explains the need for energy security allied with a reduction in carbon emissions.

6.68 The 'British Energy Security Strategy' (April 2022) was prepared in response to rising global energy prices, provoked by surging demand after the pandemic as well as conflict in Eastern Europe. The strategy is very clear that all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment will be required. This is afforded substantial weight in the planning balance.

Good Design

6.69 Through undertaking an iterative design process as outlined in the Design and Access Statement, the design of the Proposed Development has been a key consideration in the layout of the site through the placement of equipment and proposed landscaping to minimise harm and provide significant benefits to the development as a whole. This is afforded moderate weight in the planning balance.

Biodiversity Enhancement

6.70 The enhancement of the biodiversity value of the Site is demonstrated within the Environmental Statement that accompanies the planning application. Ecological features that will be delivered at the site, outside of the BESS compound, will provide a significant improvement over the baseline ecological situation. This is afforded substantial weight in the planning balance.

7. CONCLUSION

- 7.1 For the reasons outlined in this Planning Statement, it is considered that the Proposed Development is in accordance with the relevant planning policies and guidance at both the national and local levels.
- 7.2 The Proposed Development represents a clear form of sustainable development, storing energy and helping reduce carbon emissions which are required to meet the Climate Act 2050 net zero target.
- 7.3 The Proposed Development would provide high-speed energy balancing services to the National Grid, aligned with the guidance to increase the flexibility of the energy network in accordance with the Government's policy to address energy security. This is afforded substantial weight.
- 7.4 The Proposed Development will also provide biodiversity enhancements and provide indirect socio-economic benefits.
- 7.5 It is concluded having made the assessments above that the public benefits that result from the development would outweigh the potential harms.
- 7.6 Overall, there is an urgent requirement for the Proposed Development; it is entirely suitable to the Site and its surroundings; it accords with national and local planning policy and all relevant material planning considerations when read as a whole; and will deliver significant environmental benefits.
- 7.7 In summary, based on the Proposed Development and assessments undertaken, the Site is deemed suitable for a development of this nature in terms of planning policy and guidance and planning permission should be granted. When evaluating the planning balance, the Proposed Development would accord with the local development plan and there are no material considerations which indicate otherwise.

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended)

SCREENING OPINION

Richard Moore
Enso energy

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PCC Ref. No.: 23/0402/SC

Proposal: Installation of a Battery Energy Storage System with Associated Infrastructure

Location: Land South Of Goldborough Road, Hundleton, Pembrokeshire

Part 1

Particulars and Location of Development

1. This EIA Screening Opinion has been adopted having regard to the following document (that comprises the “EIA Screening Opinion Request”):

Environmental Impact Assessment Screening Report Ref. P16-SCR
July 2023 supported by covering letter dated 26th July 2023 Ref.P16-SCR

2. The proposed development (the Development) is described at 3. of the EIA Screening Report.

Part II

Particulars of Decision

3. The Pembrokeshire County Council (the “competent authority”) hereby gives notice in pursuance of the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (the EIA Regulations) that in its view:

The development referred to in Part I hereof is a Schedule 2 development, one that does require Environmental Impact Assessment because the development, cumulatively with other development in the locality, is likely to have significant effects on the environment in respect of ecological and visual/landscape impacts.

Reason for Decision

Schedule 1 Development

4. The Development is not a Schedule 1 development.

Schedule 2 Development

5. The Development is not within a “sensitive area” as defined in the EIA Regulations.
6. The Development relates to the Energy Industry (Part 3 of Schedule 2) and is one for the storage of energy. Whilst battery storage projects are not specifically referenced in Schedule 2 such projects are a subset of energy generation. In determining whether a particular proposal for development is included within one of the categories of development local planning authorities (LPA) should have regard to The European Court of Justice that has ruled that project categories are to be interpreted widely because of the broad scope and purpose of the EIA Directive.
7. Given this, it is therefore considered that the development is a subset of and constitutes Schedule 2 development under Section 3(a) *‘Industrial installations for the production of electricity, steam and hot water’*. The area of development exceeds 0.5 hectares.
8. The relevant issue in determining whether EIA is required is whether the Development is likely to have significant effects on the environment. Schedule 3 provides the “selection criteria” for this purpose (Schedule 2 provides indicative thresholds to assist consideration of “significance”).

Schedule 3 - Significance

9. There are no apparent complex or potentially hazardous environmental effects. Impacts in relation to natural resources and human health are unlikely to be significant and this includes the effects from pollution (including noise, air and water quality). Any adverse effects are likely to be able to be satisfactorily mitigated. There is no evidence that there is likely to be a risk of major accidents/disasters. Environmental impacts during the construction phase are unlikely to be significant subject to control via a Construction Environmental Management Plan as well as a landscaping

management/re-establishment plan in respect of the proposed cable route. The generation of waste would be limited. Matters relating to contamination are unlikely to be significant. Pollution & other nuisances post-construction would be limited. Transportation impacts are unlikely to result in significant environmental effects subject to a Construction Traffic Management Plan being implemented.

10. Schedule 3 requires the consideration of potential cumulative environmental effects with other existing development and/or approved development. In addition to the existing power station, there are a number of approved developments within close proximity that include a cable and sub-station associated with the Erebus offshore wind development (approved), a cable route and converter station (under construction) associated with the Greenlink Interconnector (both of which were subject to EIA) and the development of a synchronous condenser at Pembroke Power Station (approved).
11. With regard to the potential environmental impact on ecology, at this stage any mitigation cannot be confirmed as potentially sufficient to avoid significant environmental effects. The nearby Pembroke Marine SAC could also be effected by the development. Notwithstanding these matters that relate solely to the potential effects of the development itself, the cumulative environmental effects with those other developments referenced in this Screening Opinion are likely to be significant for EIA purposes.
12. The development would be situated in the countryside. Although smaller in scale compared to other developments nearby it is not strongly associated with these. The development risks the further fragmentation of the rural landscape at this location and to contributing to the industrialisation of the broader landscape away from the major installations. As such the development is likely to have adverse environmental effects by reason of visual and landscape impacts (and potentially related impacts on the historic environment) that are likely to be significant when considered cumulatively with those other developments referenced in this Screening Opinion.
13. Whilst not consented development, EIA Scoping and/or Screening Opinions have/are being considered by the LPA for battery energy storage systems at both Lambeeth and land to south of Pembroke Power Station, a green hydrogen project at Pembroke Power Station, and cable and sub-stations associated with two other floating off-shore wind developments. This screening opinion is not determinative and can only be taken in the light of information and conditions available at that time. These developments, depending on timescales, may also become matters that should be considered cumulatively for EIA purposes.
14. The development is therefore, when considered against Schedule 3 criteria, likely to give rise to significant effects on the environment having regard to the potential cumulative effects with other development in the locality in respect of ecological and visual/landscape effects.
15. In accordance with Regulation 5 (8), this Screening Opinion has taken account of the information provided, the available results of other environmental assessments (of which there are none of material relevance that would alter the conclusions made herein) and the selection criteria set out in Schedule 3.

16. This decision takes account of the duty placed on the LPA, as a public body, by the Well-Being of Future Generations Act 2015 (“the WFG Act”) to carry out sustainable development. In order to act in accordance with the sustainable development principle, the LPA have taken into account the ways of working set out in section 4 of “SPSF1: Core Guidance, Shared Purpose: Shared Future – Statutory Guidance on the Future Generations Act 2015” by following the EIA process. The EIA process aims to prevent, reduce or offset any significant adverse environmental effects, including long-term effects, of development proposals and enhance positive ones. The process is integrated with the planning system to ensure planning decisions consider the environmental effects of development. In accordance with section 3(2) of the WFG Act and the well-being objectives, the EIA process followed will help to “manage, use and enhance Wales’ natural resources to support long-term well-being” by informing the decision making process on whether the development is likely to have a significant environmental effect.
17. In accordance with Regulation 6(8) of the EIA Regulations, where an LPA adopts an opinion to the effect that the development is EIA development, a request for a Screening Direction can be made to the Welsh Ministers.



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Head of Planning
Pembrokeshire County Council

31st August 2023





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