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CHARTERED TOWN PLANNERS

Mynydd Maen Wind Farm
DNS Application:

Planning Statement Update

August 2025

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1. Introduction

1.1 Background

1.1.1 This Planning Statement Update has been prepared by David Bell Planning Ltd ('DBP') on behalf of RES Ltd ('the Applicant') in relation to the proposed Mynydd Maen Wind Farm ('the proposed development') located on land between Newbridge and Cwmbran, partly in the Caerphilly County Borough ('CCB') and partly in Torfaen County Borough areas ('TCB').

1.1.2 The Town and Country Planning Act 1990 and associated legislation[1] provides the statutory basis for Developments of National Significance ('DNS'). Any proposal to construct or operate an onshore wind generating station with a capacity over 10 mega-watts ('MW') falls under the DNS system and requires Welsh Ministers' consent.

1.1.3 The proposed development comprises the construction and operation of up to 13 wind turbines and associated infrastructure. The proposal is therefore classed as a DNS as the combined installed capacity of the power generating elements will be greater than 10 MW.

1.1.4 The proposed development exceeds the threshold for onshore wind developments set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (the 'EIA Regulations'). In addition, the proposed development could potentially result in 'significant' environmental effects according to the EIA Regulations, therefore the proposed development is classified as an EIA development and an Environmental Statement ('ES') is required.

1.1.5 The DNS Application for the proposed development, together with a supporting ES was submitted to Planning and Environment Decisions Wales ('PEDW') in July 2024 (Reference DNS/3276725).

1.1.6 PEDW, by way of a letter dated 03 June 2025 on behalf of the appointed Inspector, requested further information under Regulation 15(2) of the Developments of National Significance (Wales) Regulations 2016 ('the DNS Regulations') and Regulation 24 of the EIA Regulations.

1.1.7 The Applicant has prepared written responses (the 'Regulation 15(2) Responses') which address the questions raised by the Inspector. The responses cover various topics principally including landscape and visual, cultural heritage, peatland resources, ecology and habitats, mineral safeguarding and aviation.

1.1.8 The Applicant has previously addressed the planning policy position in a Planning Statement dated July 2024. The Planning Statement contained a detailed appraisal of the proposed development against the provisions of the statutory Development Plans and relevant material considerations.

1.1.9 This Planning Statement Update does not repeat the past policy submissions, in particular those relating to Future Wales which still remain valid. However, it considers the proposed development against the current energy and climate change policy framework and brings this aspect of the policy framework up to date for the Inspector. An update is therefore provided in relation to the energy policy matters which have emerged since July 2024.

1.1.10 This Planning Statement Update also considers the overall planning balance between the potential benefits and the effects which may arise and concludes as to the overall acceptability of the proposed development in light of the further information provided by the Applicant in response to consultee positions and taking into account the updated energy policy framework.

[1] The DNS (Procedure) (Wales) Order 2016.

1.2 Structure of Statement

1.2.1 This Planning Statement Update is structured as follows:

- **Chapter 2** sets out the up-to-date position with regard to the renewable energy policy and emissions reduction legislative framework, highlighting changes which have emerged over the 12-month period since July 2024;
- **Chapter 3** summarises the benefits that would arise from the proposed development;
- **Chapter 4** presents overall conclusions and consideration of the planning balance with reference to the conclusions set out in the Applicant's Regulation 15(2) Responses and the updates to the energy policy framework.

2. The Renewable Energy Policy & Legislative Framework: Update

2.1 Introduction

2.1.1 This Chapter refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international, UK and Welsh provisions. The framework of international agreements and obligations, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and legislation governing greenhouse gas emissions ('GHG') reductions is based. This underpins what can be termed the need case for renewable energy from which the proposed development can draw a high level of support.

2.1.2 It is evident that there is clear and consistent policy support at all levels, from international to local, for the deployment of renewable energy generally, to combat the global climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

2.1.3 UK and Welsh Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy. The context of international climate change commitments has been set out in the original Planning Statement. Key updates include the following which are referred to throughout the chapter:

> At the UK Government level:

- The Seventh Carbon Budget (2025);
- The Climate Change Committee ('CCC') Report to UK Parliament (2024);
- The Labour Government & commitment to renewables (2024);
- The Clean Power 2030 Action Plan (2024); and
- The Onshore Wind Taskforce Strategy (2025).

> At the Welsh Government level:

- The Welsh Government, Energy Generation on Wales 2023 (2025);
- Wales Fourth Carbon Budget (2025);
- Renewable UK Cymru, Unleashing the Full Value of Welsh Renewables (2025).

2.2 UK Climate Change & Energy Legislation & Policy

The Climate Change Act 2008 & Carbon Budgets

2.2.1 The Climate Change Act 2008 ('the 2008 Act') provides a system of carbon budgeting. Under the 2008 Act, the UK is now committed to a net reduction in GHG emissions of 100% against the 1990 baseline by 2050.

2.2.2 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.

2.2.3 The CCC has produced seven, four yearly carbon budgets, covering 2008 – 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 2.1** below. Essentially, they are five yearly caps on emissions.

2.2.4 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 2.1: Carbon Budgets and Progress[2]

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1st carbon budget (2008 – 2012)	3,018 $MtCO_2e$	26%	-27%
2nd carbon budget (2013 – 2017)	2,782 $MtCO_2e$	32%	-42%
3rd carbon budget (2018 – 2022)	2,544 $MtCO_2e$	38% by 2020	-50%[3]
4th carbon budget (2023 – 2027)	1,950 $MtCO_2e$	52% by 2025	n/a
5th carbon budget (2028 – 2032)	1,725 $MtCO_2e$	57% by 2030	n/a
6th carbon budget (2033 – 2037)	965 $MtCO_2e$	78% by 2035	n/a
7th carbon budget (2038 – 2042)	535 $MtCO_2e$	87% by 2042	n/a
Net Zero Target	100%	By 2050	

2.2.5 The **Seventh Carbon Budget** ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042 is 535 $MtCO_2e$ including emissions from international aviation and shipping.

2.2.6 Page 12 of the CB7 states:

"*By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture.*"

2.2.7 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that "*this requires twice as much electricity as today by 2040*".

2.2.8 It further states that low carbon supply by 2040 will see offshore wind grow sixfold from 15 GW of capacity in 2023 to 88 GW by 2040. It adds that "*onshore wind capacity doubles to 32 GW by 2040 and solar capacity increases to 82 GW*" (page 13). The anticipated growth of onshore wind capacity is shown in the Report (page 109) and illustrated in **Figure 2.1** below.

[2] Source: Climate Change Committee (CCC).

[3] Confirmed by CCC in 'Final Statement for the Third Carbon Budget' May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

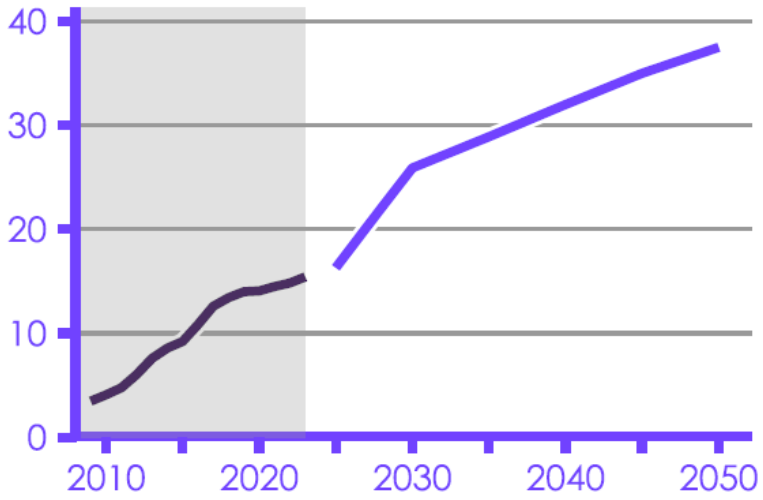

Figure 2.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'

2.2.9 In relation to the increase in onshore wind capacity, CB7 sets out (page 106) that "*this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual rollout rates previously sustained during the mid 2010s*".

Climate Change Committee Report to UK Parliament (2024)

2.2.10 The CCC published the report 'Progress in Reducing Emissions 2024 Report to Parliament' in July 2024 (the 'CCC Report'). The Executive Summary (page 8) states:

"*The previous Government signalled the slowing of pace and reversed or delayed key policies. The new Government will have to act fast to hit the country's commitments.*

The cost of key low-carbon technologies is falling, creating an opportunity for the UK to boost investment, reclaim global climate leadership and enhance energy security by accelerating take-up. British-based renewable energy is the cheapest and fastest way to reduce vulnerability to volatile global fossil fuel markets. The faster we get off fossil fuels, the more secure we become."

2.2.11 The CCC Report makes it clear that urgent action is needed to get on track for the UK's 2030 emissions reduction target. In this regard it states (page 8):

"*The UK has committed to reduce emissions in 2030 by 68% compared to 1990 levels, as its Nationally Determined Contribution (NDC) to the Paris Agreement. It is the first UK target set in line with Net Zero. Now only six years away, the country is not on track to hit this target despite a significant reduction in emissions in 2023. Much of the progress to date has come from phasing out coal generated electricity, with the last coal-fired power station closing later this year. We now need to rapidly reduce oil and gas use as well.*

Our assessment is that only a third of the emissions reductions required to achieve the 2030 target are currently covered by credible plans. Action is needed across all sectors of the economy, with low carbon technologies becoming the norm."

2.2.12 The CCC Report sets out priority actions (page 9) and it states that the UK should now be in a phase of rapid investment and delivery, however CCC note that all indicators for low carbon technology roll out are "*off track, with rates needing to significantly ramp up*." In this regard in terms of renewable technologies it states onshore wind installations will need to double.

2.2.13 Chapter 2 of the CCC Report confirms that the third Carbon Budget was met (covering the period 2018 to 2022), however "*future carbon budgets will require an increase in the pace and breadth of decarbonisation. It is imperative that an ambitious path of emissions reduction is maintained towards Net Zero*." (Page 33).

2.2.14 Section 2.3 of the CCC Report addresses emissions reductions required for future Carbon Budgets. Paragraph 2.3.1 states that:

"…*emissions reductions across most sectors will need to significantly speed up to be on track to meet the UK's climate targets in the 2030s, and therefore the long term target of Net Zero by 2050. Emissions reductions will need to outperform the legislated Fourth Carbon Budget for the UK to be on a sensible path to achieve its 2030 NDC, the Sixth Carbon Budget and Net Zero*."

2.2.15 Chapter 3 of the CCC Report examines indicators of current delivery progress and it sets out (page 50) it references a number of key points including *inter alia*:

"*Required pace – substantial progress is needed on a range of key indicators over the rest of this decade, to get the UK on track to meet its 2030 emissions targets. Low carbon technologies need to quickly become the default options in many areas…*

Renewable energy capacity has been growing steadily. However, roll-out rates will need to increase, compared to those since the start of this decade, to deliver the capacity needed by the end of the decade. Annual installations of offshore wind will need to more than treble, onshore wind more than double and solar increase by a factor of five."

2.2.16 Reference is made to electricity supply (page 56). With regard to onshore wind it states that only 0.5 GW of new onshore wind was installed in 2023 and "*this is considerably below the peak of 1.8 GW in 2017. Onshore wind installation rates will need to more than double compared to the average pace of deployment over the past three years*."

2.2.17 Chapter 2 of the CCC Report addresses the risks to the UK in achieving its emissions reduction targets.

2.2.18 With regard to the Fourth Carbon Budget (2023-2027) it states that although credible plans cover almost all of the emissions reductions required to meet it "*this budget was set before the UK's Net Zero target was legislated. The UK will need to reduce emissions by double the amount implied by the target to be on a sensible path to Net Zero*…."

2.2.19 With regard to the 2030 NDC and Sixth Carbon Budget (for the period 2023 to 2037) the CCC Report states that credible plans cover only around a third of emissions reductions needed to meet the UK's 2030 NDC and a quarter of those needed to meet the Sixth Carbon Budget. It adds "*that 2030 NDC is now only six years away. While our assessment of the policies and plans to deliver it has improved slightly, there remains significant risks to achieving these goals*."

Labour Government & Commitment to Renewables (2024)

2.2.20 The UK Government change at Westminster in 2024 and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to Net Zero.

2.2.21 The Department for Energy Security and Net Zero ('DESNZ') issued a Statement on 8 July 2024 which included references to double UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030.

UK Government: Clean Power 2030 Action Plan (2024)

2.2.22 In addition, a key new material consideration is the Clean Power 2030 Action Plan, issued by DESNZ in December 2024. It sets out (page 9) that Britain needs to install "*clean sources of power at a pace never previously achieved*".

2.2.23 It further adds (page 10):

"*clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for secure and affordable energy supply, the creation of essential new energy industries supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change. Clean power by 2030 is a sprint towards these essential goals*".

2.2.24 Within the Action Plan, it sets out that by 2030 there should be 27-29 GW of onshore wind operational within the UK. At present, there is only 14.2 GW of installed onshore wind capacity in the UK.

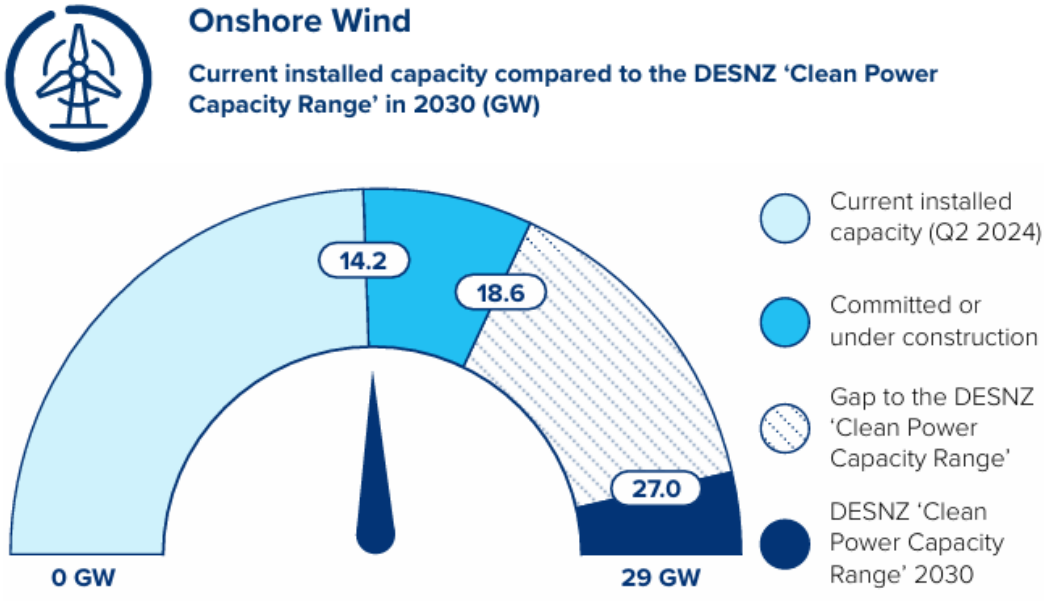

Figure 2.2: Onshore Wind & 'Gap' to reach 2030 UK Target

2.2.25 The document adds (at page 38) that "*Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also by way of the application of clean power in the buildings, transport and industry sectors… The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity*".

2.2.26 There is therefore a significant gap between the target onshore wind capacity for 2030 compared to what is currently installed. The gap is some 14.8 GW of required new capacity and the bulk of that is expected to be delivered in Scotland and Wales. As noted above, the CCC has recommended that the UK achieve a higher figure of 32 GW of onshore wind by 2040 in its projections for the Seventh Carbon Budget.

2.2.27 Page 74 of the Action Plan states that "*Meeting the renewable capacity set out in the DESNZ 'clean power capacity range' is achievable but will require deployment at a sharply accelerated scale and pace"*.

The Onshore Wind Taskforce Strategy (July 2025)

2.2.28 DESNZ published the Onshore Wind Taskforce Strategy in July 2025. The strategy sets out over 40 actions, primarily Government commitments to resolve key blocks to onshore wind within the UK. The Strategy's overall aims are to boost onshore wind deployment and to deliver economic benefits for local communities, businesses and the consumer.

2.2.29 The Ministerial Forward by the Secretary of State for Energy Security and Net Zero states:

"As one of the cheapest and fastest to build sources of power we have, onshore wind will play a critical role in boosting our energy independence with clean power by 2030. The reality is that every turbine we build helps protect families, businesses and the public finances from future fossil fuel shocks.

That's why in our first 72 hours in office, we lifted the onshore wind band in England - in place for nine years under the previous Government. And it's why last July we established the Onshore Wind Taskforce to bring Government, industry and trade unions together to explore how we can radically accelerate deployment of this critical technology.

The Onshore Wind Taskforce strategy is the outcome of that work. It sets out more than 40 steps Government and industry will take to help deliver up to 29GW of onshore wind by 2030. That includes driving ambitious reforms to planning, grid connections, and routes to market, while building the supply chains and skilled workforce we need."

2.2.30 In addition, within the forward the statement by the Head of Clean Power 2030 within DESNZ states *inter alia*:

"Clean Power 2030 is our ambitious mission to grow rapidly Britain's clean electricity infrastructure, reducing Britain's dependency on imported oil and gas, securing key clean industries and readying the country for the expected growth in electrical demand over the next 20 years.

Our Clean Power Action Plan targets a near doubling of onshore wind capacity up to 29GW by 2030. That will require rapid development of new onshore wind across Britain and repowering of existing sites to bring British consumers some of the cheapest homegrown power that can be produced. We are already working with NESO to slash the queue of projects waiting to connect to the grid to accelerate the best onshore wind development.

Rapid deployment of onshore wind is our first line of defence against future gas price spikes - every megawatt added displaces imported gas in the power system. With the steps in this new strategy, we will cement the growth of an important homegrown industry. The momentum behind clean power continues to grow."

2.2.31 The various commitments and actions within the strategy cover:

- Scoping, planning and consenting improvement for onshore wind projects;
- Networks and systems reform;
- Communities and public perception actions;
- Aviation and defence commitments to improve the interface between wind energy and civil and military radar and related matters;
- Finance and routes to market; and
- Supply chains, skills and workforce.

2.2.32 The Strategy refers to the Government's Clean Power Action Plan, which was published in December 2024 and which set out a pathway to achieving the mission of clean power by 2030. Page 10 of the strategy states that:

"All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB[4]. That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)".

2.2.33 The strategy also emphasises the significant economic opportunity that further onshore wind deployment will deliver (page 10). It states that meeting the onshore wind 2030 targets together with the actions within the Strategy, could deliver up to 45,000 direct and indirect jobs in Great Britain and result in £70 million per year of extra investment in community benefits.

2.2.34 At page 18 of the Strategy, reference is made to illustrative deployment scenarios which it states emphasises "*the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales*." This is illustrated in **Figure 2.3** below.

[4] The strategy explains that this means delivery of a system with at least 95% of GB's generation being produced from clean sources

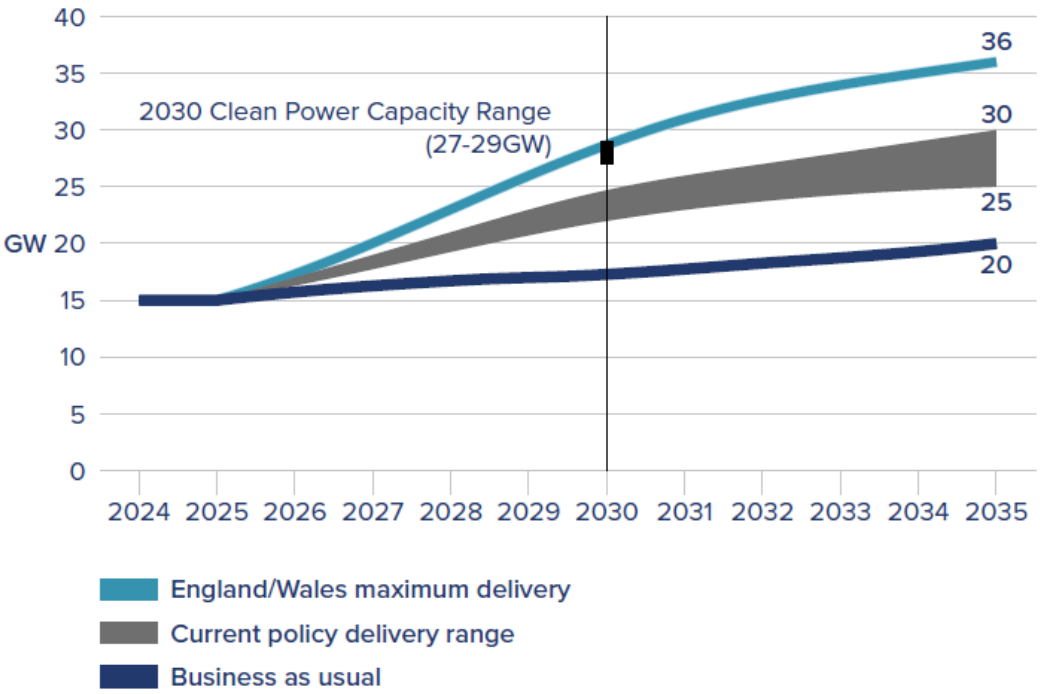

Figure 2.3: Clean Power Deployment Scenarios (Onshore Wind)

2.2.35 The scenarios as illustrated in **Figure 2.3** include:

- *Business as usual* - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.
- *Current policy delivery range* - this assumes the implementation of the reform announced as part of the Clean Power 2030 Action Plan and the action set out in the Onshore Wind Taskforce Strategy. In this scenario around 25 GW is installed by 2030 and 30 GW by 2035.
- *England / Wales maximum delivery* - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.

2.2.36 The Strategy addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030 and is establishing a new Onshore Wind Council to oversee the implementation of the Strategy.

2.3 Climate Change & Renewable Energy Policy: Wales

Energy Generation in Wales 2023 (March 2025)

2.3.1 The Welsh Government published *Energy Generation in Wales* in March 2025. It sets out the energy generation capacity in Wales in 2023 and analyses how it has changed over time.

2.3.2 The Ministerial Foreword from Rebecca Evans MS Cabinet Secretary for Economy, Energy and Planning states:

'*Our vision is for Wales to generate renewable energy to meet our needs now and for the future. Paramount to this, is ensuring renewable energy generation in Wales has tangible economic and social benefits that are retained and realised by local communities across Wales.*

Within this report, the impact of increased electricity demand and reduced electricity generation overall shows the scale of the challenges we face and the need for action to unblock barriers to new renewable energy generation in Wales'.

2.3.3 In terms of overall electricity generation in Wales, the report states (page 4) that only 109 MW of renewable electricity capacity was installed in 2023, however none of this included wind energy. Furthermore, this remains well below the peak of 966 MW which was installed in 2015. Moreover, this is the first year since the 1990s that no onshore wind projects were commissioned in Wales.

2.3.4 The report also references the regional context for renewable energy generation, analysing it down to the local authority level. For Caerphilly and Torfaen, which are within the Cardiff Capital Region, the figure for 2023 was only 2% and 1% respectfully - namely, the percentage of total Welsh renewable energy generation from the local authority areas. This contrasts with Powys at 13%, Flintshire at 10%, Rhondda Cynon Taf at 8% and Neath Port Talbot at 13%.

2.3.5 The report examines various generation technologies and in terms of onshore wind (page 28) it confirms that in 2023 no new onshore wind sites became operational in Wales. It states '*this decline sharply contrasts with the period between 2016 and 2019, when an average of 160 MW was installed annually*.'

2.3.6 The report examines progress towards targets and confirms that the Welsh Government has a target for Wales to meet the equivalent of 70% of its annual electricity consumption from Welsh renewable electricity generation by 2030, and 100% by 2035. The previous report confirmed that in 2022, the figure for electricity consumption was an estimated 59%. The March 2025 report states (page 44) that Welsh electricity consumption data for 2023 has not yet been published.

2.3.7 The latest report clearly indicates that there remains a considerable downturn in onshore wind deployment in Wales.

Wales Fourth Carbon Budget (May 2025)

2.3.8 The CCC published a report entitled 'Wales Fourth Carbon Budget, Advice for the Welsh Government' in May 2025. The report highlights that global warming has unequivocally been caused by greenhouse gas emissions and that there is evidence of climate change now being seen in Wales. Reference is made that in 2022, Wales recorded its highest ever temperature of 37.1°C in Flintshire which impacted health, ecosystems and infrastructure (page 9).

2.3.9 The report outlines the CCC's advice on the level of Wales's Fourth Carbon Budget. The recommended level for the budget is a 73% reduction in average annual emissions compared to the 1990 baseline over the five-year period from 2031 to 2035.

2.3.10 The report highlights that the start of Wales's Fourth Carbon Budget is only six years away and it states:

"*Achieving it will require a focus on key near term actions, particularly in surface transport, buildings and agricultural and land use*."

2.3.11 It adds: "*the growth of renewables and the take up of electric vehicles (EVs) and heat pumps provide the majority of the emissions reduction required between now and the Fourth Carbon Budget period…*" (page 9).

2.3.12 Section 2.1 references 'the balanced pathway' for Wales and it sets out that the pathway is aligned with Wales's contribution to the UK's balanced pathway, which the CCC presented in its advice to the UK Government on the Seventh Carbon Budget (page 37).

2.3.13 Section 3.1 of the report makes reference to sectoral contributions and, in relation to electricity supply, it assumes that emissions will fall by 85% from 2022 to 2033. It states "*electricity supply emissions are currently falling quickly, and this will need to continue. Further deployment of low carbon generation technologies, such as wind and solar, is needed to decarbonise existing demand and meet new demand as other sectors electrify*."

2.3.14 The report addresses electricity supply (page 57) and sets out key actions to deliver the balanced pathway. It states in relation to recommended actions that:

"*Deployment of low carbon generation and associated infrastructure is required at scale in Wales. The Welsh Government must work with the UK Government to deliver strong policy consistent with decarbonising electricity supply in Wales… and to continue to progress Welsh specific programmes where these are devolved (for example, on planning and consenting for new low carbon development*)".

2.3.15 The report addresses sources of future emissions reduction (page 12) and in relation to low carbon supply states that "*in our pathway, capacity of variable renewables (combination offshore and onshore wind and solar) more than doubles to 8 GW by 2033. This provides 78% of electricity generation and caters for increasing demand in Wales as well as the rest of Great Britain*."

Unleashing the Full Value of Welsh Renewables (May 2025)

2.3.16 RenewableUK Cymru issued a report entitled 'Wind, Solar and Tidal Stream: Unleashing the Full Value of Welsh Renewables' in May 2025. It sets out that large scale renewable energy is one of the clearest and most immediate opportunities to deliver lasting transformative benefits for Wales and in relation to creating high quality jobs and deeper economic growth, such that it can secure direct investment into local communities and boost energy security.

2.3.17 The report highlights that Wales only added 109 MW of new capacity in 2023 and almost all of that was from small scale solar development and no new wind farms were commissioned. The organisation has set out a pathway entitled 'Maximising Renewables' which it considers "*not only drives the greatest local prosperity, but also increases security of energy supply, boosts innovation, enhances Wales's global role in reducing carbon emissions and its international footing as a frontrunner in renewable energy investment*."

2.3.18 The pathway envisages up to 17.7 GW of renewable energy by 2035 in Wales. Such a level of investment, the report estimates, would result in some 6.9 billion gross value added ('GVA') and the creation of some 8,000 full time equivalent ('FTE') jobs in Wales.

2.3.19 The report seeks actions from the Welsh Government, including setting minimum technology targets to support the industry and to deliver the maximising renewables pathway and to create accelerated progress through the establishment of a Sector Deal. The approach advocated also seeks an appropriate policy and regulatory framework to enable such a scale of benefits to be realised.

2.3.20 The overall approach matches with the recent advice from the CCC to the Welsh Government (May 2025) in relation to the deployment of low carbon and renewable energy and the need for action in relation to planning and consenting.

3. The Benefits of the Proposed Development

3.1 The Benefits: Summary

3.1.1 This Chapter summarises the benefits that would arise from the proposed development.

Renewable Energy Generation & Emission Savings

3.1.2 Renewable energy and emissions savings benefits would include the following:

> With an overall installed capacity of up to approximately 54.6 MW, the Proposed Development would make a valuable contribution to the attainment of the UK and Welsh Government policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK and Welsh Government targets. As explained, there is now a distinct shift in policy emphasis from the displacement of higher carbon electricity generation to extending the use of electricity as the critical energy response to the Climate Emergency.

> The Welsh Government has committed to attaining Net Zero by 2050. In addition, a key medium term Welsh Government target is to generate 100% of consumed electricity by renewable means by 2035. The Government has made it clear that onshore wind plays an important role in the attainment of future targets in relation to helping to combat the crisis of global heating.

> The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Development's delivery of an estimated renewable generation capacity of up to approximately 54.6 MW in the near term will have a disproportionately higher benefit than the same capacity delivered later.

> As set out in the Carbon Balance Report in the ES, it is anticipated that the Proposed Development could generate around 192,851 MWh hours (MWh) of electricity per year. This is equivalent to the annual electricity needs of 55,000 homes each year, or approximately 40 percent of the current combined housing stock in Caerphilly and Torfaen County Borough Councils.

> The Carbon Balance Report addresses emissions savings and sets out that as measured against a fossil-fuel mix of electricity, the total carbon dioxide (CO_2) savings would be expected to be approximately 78,881 tCO_2e per annum. The overall emissions impact is therefore considered to represent a beneficial and long-term climate change effect. Consequently, the Proposed Development contributes towards Wales's emissions reduction targets as set out in the Environment (Wales) Act 2016.

Security of Supply

3.1.3 Reducing Wales' and the wider UK's dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

Economic, Employment & Community Socio-Economic Benefits

3.1.4 The Proposed Development would generate economic benefits both during its development and construction and during its operation and maintenance. The benefits that would arise are set out in Chapter 14 of the ES. It should be referred to for its detail, but summary conclusions are set out below:

- The proposed wind farm would also provide an economic boost to both Borough Council areas and the regional economy, creating jobs and stimulating economic activity during its construction and operational phases. There is a strong likelihood of local labour involvement during the construction of the proposed wind farm, providing an economic boost to the local areas.
- The proposed wind farm is estimated to involve a capital spend of £74.0 million. Of this total, £26.3 million (nominal prices) would be realised within the Welsh economy.
- The projected 15-month construction phase is estimated to create or sustain 233 total (direct, indirect and induced) job years of employment, £5.68 million of wages, and £14.89 million of GVA to the Welsh economy.
- The estimated total (direct, indirect, and induced) annual benefits realised in Wales by the operational phase of the proposed wind farm includes 8 job years of employment, £160,000 of wages, and £590,000 in GVA.
- The proposed wind farm is also expected to provide a fiscal injection in terms of increased tax revenues. Estimated tax revenues from wages over the construction phase are estimated to be £1.87 million, with an additional £50,000 expected for each year of operation.
- Annual business rates for the proposed wind farm are estimated at £1.07 million.

Biodiversity Net Benefit

3.1.5 Biodiversity net benefit will be achieved through implementation of measures to bring the vegetation on the common into better condition. It will involve implementation of measures identified in the Commons Innovation Plan, including bracken control, creation of mixed-age heather and further pond creation initiatives. The extent of common land will be maintained through a land swop application that will bring peripheral land areas into common use. Some complementary habitat creation will be undertaken in these areas. The proposal would deliver biodiversity net benefit in accordance with planning policy.

4. Conclusions

4.1 Conclusions on the Renewable Energy Policy & Legislative Framework

4.1.1 The Applicant's position is that the proposed development is very strongly supported by the current climate change and energy policy framework.

4.1.2 It is clear from the latest Energy Generation in Wales report, produced by the Welsh Government this year, that there has been a considerable fall in the deployment rate for renewables and in particular for onshore wind. Given that wind energy is the key technology driving the new 100% renewables electricity target for Wales by 2035 and for the UK by 2030, it is imperative that the deployment rate increases in order to attain that target and also to provide the foundation for reaching net zero.

4.1.3 The Carbon Budget 2 for Wales makes it clear that making substantial progress this decade will be critical, not just for the 2030 legally binding emissions reduction target, but to stay on a credible pathway to reach net zero.

4.1.4 The trajectory, in terms of the scale and pace of action to reduce emissions, is steep and it is essential that rapid progress is made through the 2020s. The rate of emission reductions must increase otherwise the Carbon Budget targets and Wales' 100% of electricity demand from renewables target for 2035 will not be met.

4.1.5 As explained in Chapter 2, the CCC has stated in the Seventh Carbon Budget that the deployment of low carbon technology needs to significantly ramp up. In this regard in terms of renewable technologies the CCC has stated that onshore wind installations will need to double by 2030, and a higher figure is estimated in relation to renewable deployment capacity to achieve the Seventh Carbon Budget published in May 2025. The Labour Government has accepted the advice of the CCC and has committed to a 30 GW onshore wind target for the UK as set out in the recently published Clean Power Action Plan and in the Onshore Wind Taskforce Strategy.

4.1.6 The important benefits of the proposed development have been outlined within the context of the ongoing climate emergency. These benefits would play an essential role in addressing climate change, supporting the achievement of ambitious net zero targets, and contributing to improved energy security.

4.1.7 Decisions through the planning system must be responsive to this changed position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance.

4.1.8 The various legislative interventions and statements of Government policy such as those described above are material considerations of particular relevance that should be afforded weight, and indeed increasingly greater weight.

4.1.9 In the most recent climate change and renewable energy policy documents referred to, there is a consistent and what might be termed a 'green thread' which ties a number of related policy matters together: namely the urgent challenge of net zero and the need to substantially increase renewable capacity, in particular in Wales where it has stalled.

4.1.10 On 17 September 2024, the First Minister, Eluned Morgan, set out priorities for the Welsh Government and in addition to matters relating to health, education and infrastructure referenced "*Green jobs and growth, creating green jobs that tackle the climate crisis and restore nature, while making families better off; accelerating planning decisions to grow the Welsh economy*."

4.1.11 It is considered that the need case is to be afforded very significant weight in the planning balance. It is not an over-riding consideration; however, it must be acted on. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance. It is the cumulative effect of a large number of individual projects which will move Wales towards where it needs to be in order to attain net zero.

4.1.12 In relatively recent DNS decisions, decision makers have referenced the significant weight to be afforded to the climate crisis and the role of onshore wind development.

4.1.13 In relation to the Twyn Hywel DNS decision of the Welsh Ministers (05 November 2024) onshore wind development and the benefits that were predicted, the Inspector set out at paragraph 315 of the DNS Report to Ministers:

"*Future Wales Policy 17 confirms Welsh Government's strong support to the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. It explains that in determining planning applications for renewable and low carbon energy development, decision makers must give significant weight to the need to meet Wales's international commitments and Welsh Government's target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. The subsequent July 2023 target is for 100% electricity from renewable energy sources by 2035. I have also taken account of the policy research and progress in meeting target updates provided by the applicant to Hearing 1.*

It is clear that onshore wind energy has an important role to play in meeting the Government's renewable energy targets."

4.1.14 Furthermore, in the Garn Fach DNS decision of the Welsh Ministers (22 October 2024), it should be noted that although the development in that case had some impact in relation to peat resources, the Welsh Ministers and the Inspector considered that the high test of 'wholly exceptional' circumstances would be met due to the scheme's contribution to the Welsh Government's renewable energy targets.

4.1.15 In the Garn Fach onshore wind development, the Inspector at paragraph 230 of the DNS Report stated:

"*It is clear that onshore wind energy has an important role to play in meeting the Government's renewable energy targets. Whilst reliance on future works to upgrade the National Grid will delay the project's implementation and its potential timely contribution to meeting these targets, it is a scheme that would significantly add to the country's renewable energy generation capacity. It is a matter to which I afford considerable weight.*

The scheme would also result in local economic benefits, particularly during the construction phase to which I attach significant weight."

4.1.16 It must follow that the need case for the proposed development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance. It is the cumulative effect of a large number of individual projects which will move Wales towards where it needs to be in order to attain net zero.

4.2 The Planning Balance

4.2.1 The Applicant's position in the Planning Statement of 2024 was that the proposed development accorded with local and national planning policy. Given the further information that is set out in the Regulation 15(2) responses which addresses matters raised by consultees and which answers the questions of the Inspector, that position remains.

4.2.2 Important updates within the Applicant's Regulation 15(2) response include matters relating to cultural heritage, peatland resources, ecology and habitats, landscape and visual considerations, mineral safeguarding and aviation. No unacceptable impacts are considered to arise in relation to these topics.

4.2.3 It has been demonstrated that there is a substantial need for this type of development in order that pressing future targets in relation to the global climate change crisis and renewable energy generation and GHG emission reductions can be met in time.

4.2.4 The strength of the needs case for the proposed development, as expressed by Welsh Government, is clear. It is evident from Chapter 2 of this Planning Statement Update that a dramatic increase in deployment of renewables and in particular onshore wind is required. PPW 12 reaffirms that "*the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance*" (paragraph 5.7.7).

4.2.5 The proposed development, being of scale and utilising latest technology, responds to and delivers against all of these goals. It does so through being a well-designed scheme that gives rise to no unacceptable landscape or visual impacts or such impacts in relation to other environmental and technical topics.

4.2.6 There is a climate emergency. That is a factor of importance and considerable weight in determining this DNS application. It does not require a statement to that effect in a planning document to make it so. Planning decisions must be made within and respond to the changing economic and wider policy context within which development comes forward. The planning balance can therefore no longer be approached as it has been in the past.

4.2.7 The policy imperative must be acted on. This does not mean that the decision maker should expect to find an express watering down of environmental protection. Weight is entirely a matter for the decision maker. However, the way that decision makers can recognise the strengthening policy imperative and the increased weight that should be given to the benefits of the proposed development, is by giving relatively more weight to the seriousness and importance of energy policy related considerations in the planning balance.

4.2.8 Future Wales is clear that decision makers must give significant weight to Wales's need to meet its international commitments, and its target of generating 100% of consumed electricity by renewable means by 2035. In this regard, whilst the proposed development will result in some limited adverse effects, it is considered that appropriate mitigation has been applied and the residual impacts are outweighed by the contribution that the proposal will make to meeting Wales's renewable energy targets and net zero objectives and when the wider benefits that would result are taken into account.

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