

Ein cyf/Our Ref: CAS- 220919-J3W1
Eich cyf/Your Ref: P/2023/0175

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

Date : 13 July 2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Gosod a gweithredu cyfleuster storio batris a datblygiad atodol / installation and operation of battery storage facility and ancillary development

LLEOLIAD / LOCATION: Legacy National Grid Substation, Bronwylfa Road, Talwrn, Wrexham, LL14 4HY

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 23/06/2023.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:

Approved Documents:

- Stevens, J., March 2023, Full Great Crested Newt Mitigation Strategy, Ref: AxisL-043-1215, Avian Ecology
- Legacy Battery Storage Facility, Construction Environmental Management Plan, Reference 2658-03-CEMP/JM, Axis, June 2023

Please note, without the inclusion of these documents we would object to this planning application. Further details are provided below.

Protected Species

We have reviewed the submitted Mitigation Strategy (Stevens, J., March 2023, Full Great Crested Newt Mitigation Strategy, Ref: AxisL-043-1215, Avian Ecology) and concur with the information presented and the mitigation identified.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

NRW would refer the Local Authority to the Chief Planning Officer's letter dated 01 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

In respect of licensing, we advise that component provisions of the application include:

- Long term management and surveillance plan,
- tenure and proposed changes to the ensure of the ecology area and;
- submission of the GCN compensation (mitigation) area as a GIS shape file

Pollution Prevention

We have reviewed the submitted report (Legacy Battery Storage Facility, Construction Environmental Management Plan, Reference 2658-03-CEMP/JM, Axis, June 2023) and concur with the recommendations and methodology as set out in the report in relation to pollution prevention.

The report must be included in the 'approved list of plans / documents' condition within the decision notice should consent for the project be granted.

Biosecurity

We note that *Cotoneaster horizontalis* and *Crassula helmsii* have both been recorded within the survey area. We concur with the measures described in Section 3.4 of the GCN Mitigation Strategy (Stevens, J., March 2023, Full Great Crested Newt Mitigation Strategy, Ref: AxisL-043-1215, Avian Ecology) in relation to the management of *Crassula helmsii*. We advise that you consult with your Ecologist regarding any remaining biosecurity considerations.

Designated Landscape

Our landscape planning advice relates to the development's potential impact on the Clwydian Range and Dee Valley AONB's landscape character, visual amenity and special qualities and its accordance with national policy.

The main structural component of the proposal is 30 containers (single stacked) to house Battery Energy Storage Systems, 2.6m tall by 139x39m floor area.

The landscape and visual appraisal (Axis, March 2023) has assessed the landscape and visual baseline appropriately. The effects upon the visual setting and tranquility of the Clwydian Range and Dee Valley AONB have been assessed and are not significant for the following reasons:

Section 4.1.2 The site and its surroundings

- High embankments covered in woodland enclose the Substation and its curtilage on all sides, meaning that the structures within are not widely apparent from the surrounding area.

Section 6.1.1 to 6.1.4 Effects on Landscape Designations - Clwydian Range and Dee Valley AONB

- The proposed development would not be theoretically visible from the AONB.
- The Noise Assessment confirms that noise generated by the proposed development would not be significant. The noise assessment (inacoustic 03/03/2023) conclusions indicate the lowest background levels of 38dB to 44dB LA90 are experienced at night. Predicated noise assumed during maximum site operations with noise mitigation measures show rating noise levels from site to range between 29dB and 38dB LAeq.
- There would be no cumulative visual effects with other development

In view of the above, we consider the development is acceptable in landscape and visual terms with respect to the AONB.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Yn gywir / Yours faithfully

Rachael Burke

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.
Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.