



**PROPOSED INSTALLATION OF AN UNDERGROUND ELECTRIC CONNECTION CABLE ON
LAND SOUTH OF CEFN ROAD, WREXHAM.**

- **MINERALS SAFEGUARDING ASSESSMENT**
- **FLOOD RISK ADDENDUM**

INNOVA RENEWABLES LIMITED
FEBRUARY 2024

1.0 OVERVIEW

1.1 Innova Renewables have submitted an application for the installation of a buried high voltage cable. The cable is proposed to run from the substation at Cefn Solar farm to the west (National Grid Reference SJ37784825) to Wrexham Solar Farm to the east (SJ36824858).

1.2 This document has been prepared in response to the Planning Authority's request for a Minerals Safeguarding Assessment and information regarding flood risk following comments from NRW.

1.3 MINERALS SAFEGUARDING ASSESSMENT

1.4 The western section of the underground cable route falls within a 'Sand and Gravel Safeguarding Area' defined by Policy SW16 and MW1 of the Wrexham LDP. Policy SP16 relates to minerals supply and safeguarding, Policy MW1 relates to minerals safeguarding and states:

'Non-mineral development within Mineral Safeguarding Areas as defined on the proposals map will only be permitted where it can be demonstrated that:

- i. The mineral underlying the site does not merit extraction; or*
- ii. The need for the non-mineral development outweighs the need to protect the resource; or*
- iii. The mineral can be satisfactorily extracted prior to the non-mineral development; or*
- iv. The development is of a temporary nature or can be removed within the timescales within which the mineral is likely to be needed; and*
- v. Essential infrastructure that supports the supply of minerals would not be compromised or would be provided elsewhere;*

All applications for development in these areas shall be supported by a Mineral Safeguarding Assessment.

Proposals for non-mineral development on allocated sites of 4ha or more and which are underlain by Category 1 sand and gravel shall be supported by a Prior Extraction Assessment.'

1.5 The explanatory text details that; *'The Mineral Safeguarding Assessment should contain sufficient information to enable the Local Planning Authority to establish whether the proposed development meets any of the criteria identified within the policy above'*. The wording of the Policy is such that the satisfaction of one of the five criteria would make the proposal compliant with the policy.

1.6 Figure 1 shows the full proposed cable route. Figure 2 shows approximately 350 metres of the cable route which runs under agricultural land. The rest of the 1km cable route is directly within or directly adjacent to existing asphalt roads and the public highway.

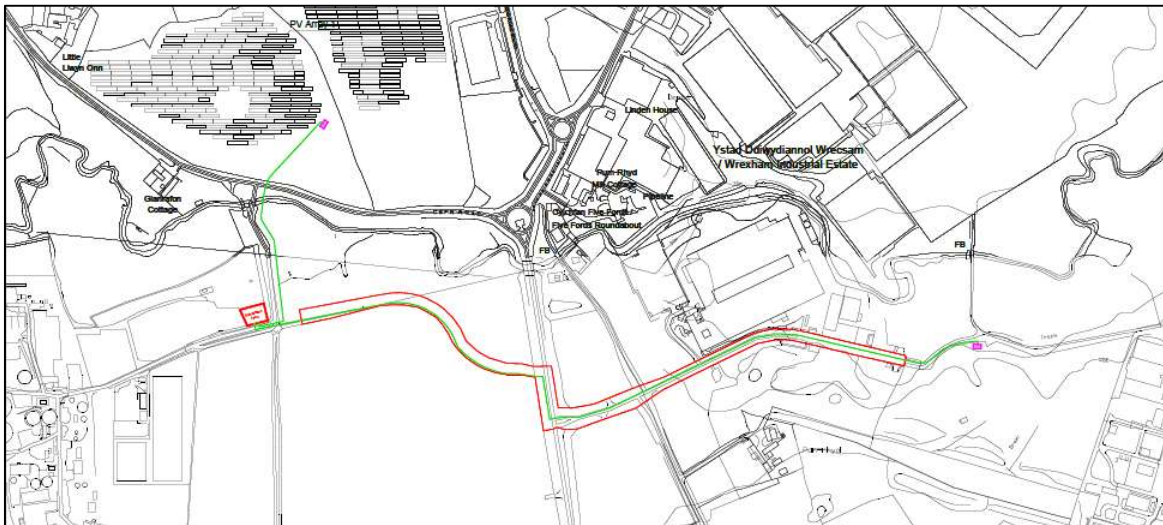


Figure 1: Proposed cable route

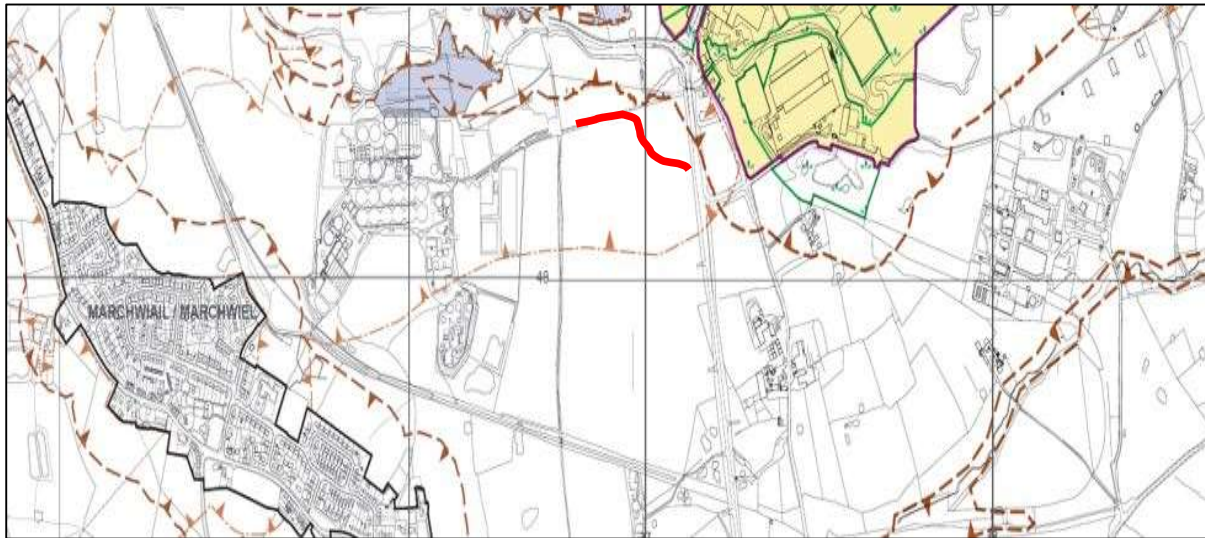


Figure 2: Cable route within safeguarding area outside of highway network.

1.7 The safeguarding area covers existing built environment and highways, any minerals within the built environment and highways are considered sterilised at the present time. It would therefore be reasonable to exclude sections of the cable route within the highway from the requirement of a MRA.

1.8 THE NEED FOR THE NON-MINERAL DEVELOPMENT

1.9 Part ii of Policy MW1 details that development will be permitted if it is demonstrated 'the need for the non-mineral development outweighs the need to protect the Resource'.

2.0 The delivery of low carbon and renewable energy is essential to reduce reliance on fossil fuels to generate electricity. The UK is moving away from hydrocarbon energy sources towards more sustainable energy sources.

2.1 Section 5.9 of the Planning Policy Wales (February 2024) states *"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."

2.2 The Welsh Government encourages the use of local renewable and low carbon energy as part of the imperative to reduce carbon emissions and has set challenging targets for decarbonisation and increased renewable energy generation.

2.3 Policies RE:1 and RE2 of the Local Development Plan are supportive of renewable energy schemes reflecting the national support of renewable energy.

2.4 The cable route proposed is essential infrastructure supporting the delivery of clean renewable energy from adjacent solar farms.

2.5 The need to generate electricity from low carbon and renewable energy, which this development assists with, means there is arguably an overriding need for the development.

2.6 TEMPORARY NATURE OF DEVELOPMENT

2.7 Part iv of Policy MW1 details that 'development of a temporary nature' will be permitted. The development proposed is in connection with adjacent solar farms which are not permanent developments. The solar farms will operate for a period of 40 years. When the solar farms cease to operate, all the panels and supporting infrastructure will be removed. The quantity, quality or value of any potential mineral resource at the site is currently not known, however, following the lifetime of the temporary solar farm development and associated infrastructure, if it is deemed the resource is appropriate the mineral can be extracted.

2.8 LIKELIHOOD OF MINERAL EXTRACTION.

2.9 A section of the cable route travels east west underground within an agricultural field. The field is approximately 22 ha in area, which is likely too small to be a mineral extraction site in its own right, once you have including required infrastructure and taken into account existing adjacent land uses including water treatment works, industrial estates, road infrastructure and dwellings.

3.0 The cable route has been designed to have minimal disruption by following the northern field boundary. The field boundary and cable route run approximately 50 metres south of the river Clywedog. Land north of the cable route and river is at high risk of flooding.

3.1 Mineral extraction is unlikely to extend closer to the river than the proposed cable route. The proposed cable route is likely on the northern limit of any potential mineral extraction and would therefore not be sterilising any minerals.

3.2 FLOOD RISK ADDENDUM

3.3 Natural Resource Wales in their formal consultation response detailed flood risk. Their comments stated:

'Our Flood Risk Map confirms the application site lies partially within Zone C2 of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 (Rivers). Given the nature of the proposed development (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks. To ensure that there is no impact on the flood regime we advise that there should be no ground raising or deposition of material within any flood zones. We refer the applicant to our website for further advice and guidance. We wish to advise the applicant that the afon Clywedog is a designated main river and any works in,

over, under or certain activities within 8m of the river may require a permit. Further details are available at Natural Resources Wales / Flood risk activity permits.'

3.4 The cable route travels east west from Wrexham solar site to the substation east of the water works. At the eastern most section of the route the cable route will be within the public highway which has a very low risk of flooding from rivers. The cable route then travels across Seswick Way and then follows the field boundary to the substation. In a very small section adjacent to the Seswick way the cable route travels across a small section of land at high risk of flood risk from surface water and small watercourses.



Figure 3: Flood risk maps source: <https://flood-risk-maps.naturalresources.wales/?locale=en>

3.5 The cable route will be completely underground, therefore at minimal risk in the event of a flooding event. The cable route will be directionally drilled underground or trenched in places. There would be no change in levels as a result of the proposal. Ground levels would remain the same following the construction of the cable route.

3.6 The location of the development is as such to support the consented solar farms and their renewable energy contribution to the existing water treatment works. The proposal is essential infrastructure that cannot be sited elsewhere.

3.7 Approximately 350 metres of the approximately 1km cable route will be buried within agricultural land. With the remaining section being within or directly adjacent to the public highway resulting in no change in levels or ground permeability.

3.8 CONCLUSION

3.9 The mineral safeguarding policy aims to protect commercially useable minerals from sterilisation by built development. In this case the proposed development will not cause permanent sterilisation, the cable route can be removed and recycled when the associated solar farm development reaches the end of its life, leaving any possible mineral available for future use if required. Due to the position and route of the cable it is unlikely the development will result in the sterilising of minerals, there is also a significant overriding need for renewable energy and associated infrastructure.

4.0 The proposed cable route will be completely underground, the majority of which will be within or directly adjacent to the public highway. There will be no increase in ground levels. There will therefore be no increase in flood risk, and the development will not be at risk from a flooding event.