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LL572DW

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

ebost/email:
northplanning@cyfoethnaturiolcymru.gov.uk

11/05/2023

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 / Natural Resources Wales about the above, which we received on 21st April 2023.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition: Biosecurity

We also advise that based on the information submitted to date, the document identified below should be included in the approved plans and documents condition on the decision notice.

Approved Document: Stevens, J., March 2023, Full Great Crested Newt Mitigation Strategy, Ref: AxisL-043-1215, Avian Ecology

Without the inclusion of this condition and document we would object to this planning application.

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

Biosecurity

We note that *Cotoneaster horizontalis* and *Crassula helmsii* have both been recorded within the survey area. We advise that biosecurity measures should be set in place both during construction and operation, and should be set out in the Construction Environmental Management Plan (CEMP). We advise that biosecurity measures within the CEMP should be agreed as a condition of any planning permission.

Condition 1: No development shall commence until a CEMP has been submitted to and approved in writing by the determining authority. The CEMP should include:

- Biosecurity Risk Assessment detailing measures to control, remove or for the long-term management of invasive species.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

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.

Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

For further guidance please refer to GPP 5 and PPG 6 at the following link:

[Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

We note that a CEMP will be produced. We advise that the CEMP should demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented and should be agreed as a condition of any planning permission (see Condition regarding Biosecurity above).

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.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Rachael Burke

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales