

**PLANNING STATEMENT
RESERVE POWER PLANT EXTENSION**

**LAND TO THE SOUTH OF MINER'S ROAD,
LLAY INDUSTRIAL ESTATE**

Prepared for



Prepared by



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Project Quality Assurance Information Sheet



Reserve Power Plant Extension Planning Statement

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DRAWING SCHEDULE

Drawing Number	Drawing Title	Scale	Sheet Size
SRE1082/17/01	Site Location Plan	1:25,000	A4
SRE1082/17/02	Planning Application Boundary	1:500	A3
SRE1082/17/03	Indicative Site Layout	1:500	A3
SRE1082/17/04	Indicative Lube Oil Storage Elevations	1:50	A3
SRE1082/17/05	Indicative Transformer Elevations	1:25	A3
SRE1082/17/06	Indicative Gas Generator Elevations	1:100	A3
SRE1082/17/07	Indicative Battery Container Elevations	1:50	A3
SRE1082/17/08	Indicative Battery Components Elevations	1:100	A3

APPENDIX SCHEDULE

Appendix No.	Title
A	Landscape and Visual Appraisal
B	GCN Mitigation Strategy, agreed under planning permission P/2017/0937
C	Air Quality Assessment
D	Noise Assessment

1.0 INTRODUCTION

1.1 Purpose of this Statement

- 1.1.1 Planning permission (P/2017/0937) was granted on 4th June 2018 for a Reserve Power Plant (RPP) and associated infrastructure located to the south of Miners Road within Llay Industrial Estate, Wrexham. Sirius Planning Limited have prepared a planning application to extend the RPP facility to add an additional generating capacity of 9.95MW.

1.2 Forward

- 1.2.1 To deliver a supply of secure, sustainable and affordable electricity, the UK needs investment in new generation projects and innovative technologies. But the UK must also get the best out of existing assets on the network. The Capacity Market, a key part of the Electricity Market Reform Act, aims to address both these issues by bringing forward new investment while making the most of current generation capabilities.
- 1.2.2 The National Grid experiences a large fluctuation of demand throughout the day and throughout different times of the year. During periods of high demand, the National Grid aim to increase supply to maintain a 20% supply margin which is essential in seeking to eliminate, as far as possible, the risk of power shortages and blackouts, when there is an unexpected change in demand, or a sudden loss of supply. Historically, conventional power stations could be operated with some certainty. However, as the UK moves towards a more environmentally sustainable energy supply system, with an increase in renewable energy sources, there is an increased risk of electricity supply fluctuations, depending on prevailing weather conditions, and therefore an increased need for RPP facilities. Thus, the proposed development will support the increase in renewable energy generation and the transition to a lower carbon energy supply system throughout the UK.
- 1.2.3 OFEGM's recent statement¹ states that:
- "Our energy system is changing. There is more low carbon generation, much of it located close to people's homes and businesses, and it produces different amounts of electricity depending on factors like the time of day or the weather. New technologies such as storage are emerging and the costs of many of these technologies are falling rapidly. If we take advantage of the opportunities this provides, we can create new businesses and jobs, empower consumers and help people save up to £40bn off their energy bills in the coming decades".*
- 1.2.4 RPP facilities are a simple and reliable way of providing relatively large amounts of electricity to the distribution network in a very short space of time.

1.3 Summary of the Site and Proposal

- 1.3.1 The proposed development is for an extension to an RPP facility, within Llay Industrial Estate to add an additional generating capacity of 9.95MW of electricity at any one time and store an additional 10MWh. The application site comprises two linked rectangular plots measuring approximately 0.17ha which was formally used as a storage facility for a road haulage business.
- 1.3.2 The site is approximately 1km to the north-west of the village of Llay and 6.5km north of Wrexham. Access to the site is via an existing access point of Miners Road.
- 1.3.3 The RPP facility will provide energy balancing services to the national grid via the Government's recently introduced Capacity Market, as part of the Electricity Market

¹ OFGEM Upgrading Our Energy System – Smart Systems and Flexibility Plan July 2017

Reform programme to ensure the future security of our electricity supply.

- 1.3.4 Drawing SRE1082/17/01 illustrates the site location and drawing SRE1082/17/03 shows the general site layout.

1.4 EIA Regulations

- 1.4.1 The development falls within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 as being energy industry development with a site area that exceeds 0.5 hectares (Column 1 paragraph 3 of Schedule 2). The proposal therefore requires screening prior to the assessment of the application.
- 1.4.2 Schedule 3 of the EIA Regulations 2017 provide the criteria upon which the development should be screened to determine the likelihood of any 'significant' effects. As demonstrated through the environmental assessments accompanying the application, no 'significant' effects would occur as a result of the development and therefore the proposal is not considered to constitute EIA development.

1.5 The Applicant

- 1.5.1 Sirius Renewable Energy is developing an expanding portfolio of bespoke energy generation projects throughout the UK, specialising in development on both greenfield and brownfield sites.

1.6 Planning Statement Structure

- 1.6.1 This Planning Statement has been organised into the following chapters:
- The Site and Surroundings;
 - The Proposed Development;
 - Environmental Considerations;
 - Planning Policy & Material Considerations; and,
 - Summary & Conclusions.

2.0 THE SITE AND SURROUNDINGS

2.1 Introduction

- 2.1.1 This chapter provides a description of the site in terms of its location, history, and surrounding land uses.

2.2 Location

- 2.2.1 The application site is situated within Llay Industrial Estate and comprises two linked rectangular plots measuring approximately 0.17ha. The site is approximately 1km to the north-west of the village of Llay and 6.5km north of Wrexham. The site is centred on approximate National Grid Reference 332485, 356381. The location of the site is shown on drawing SRE1082/17/01 and Figure 2.1 below.

Figure 2.1: Site Location



2.3 The Application Site

- 2.3.1 The industrial estate the site is located within originally comprised the Llay Main Colliery which ceased operations in 1996 and the site was redeveloped as an industrial estate in the early 1970's. The spoil heap associated with the colliery is located to the south of the site.
- 2.3.2 The site most recently was used as a storage facility for a road haulage business. The proposal site is no longer actively used and it currently in the process of being cleared. Planning permission was granted for an industrial building; however, this was never constructed and the permission has now lapsed.
- 2.3.3 The site is enclosed by fencing and scrub vegetation along the perimeter boundaries. A series of conifer trees also line the boundary to the west.

2.4 Site and Surroundings

- 2.4.1 The site forms a plot within the Llay Industrial Estate. A steel fabricating business is located within the plot to the east and a scrap merchant located within the plot to the west of the site. Miner's Road runs adjacent to the north of the site with further industrial units beyond. To the south of the site is an existing colliery spoil heap and dormant quarry operation.

Figure 2.2: View of the existing site

2.5 Site Access

- 2.5.1 Access to the site is via an existing access point off Miners Road.

2.6 Identified Receptors and Designations

- 2.6.1 The nearest residential receptors to the application site are located approximately 520m to the south-east, beyond the B5102.
- 2.6.2 The nearest statutory ecological designation is Llay Blog SSSI located approximately 1km to the south-west of the site. There are no listed buildings or Scheduled Ancient Monuments within Llay Industrial Estate. The only historical archaeological record within the industrial estate is approximately 350m north-east of the site and relates to the Llay Main Colliery Branch Railway.
- 2.6.3 The site lies within the administrative boundaries of Wrexham County Borough Council. Under the adopted Wrexham Unitary Development Plan (2005) the site is an unallocated parcel of land within the development limits of Llay. Under the emerging Local Development Plan the site is allocated as within an employment area.

2.7 Site History

- 2.7.1 The planning history for the application site is set out in Table 2.1 below.

Table 2.1: Site Planning History

Planning Reference	Planning Description	Date
LL 12043	Erection of microcomputer workshop and alteration to existing vehicular and pedestrian access	Application approved July 1985
LLA 17079	Erection of 7 no. industrial lettable units and construction of new vehicular and pedestrian access	Application approved August 1989
LLA 22420	Erection of Heavy Goods Vehicle Repair Shop	Application Approved July 1994
LLA P/2017/0937	Construction and operation of a Reserve Power Plant and associated infrastructure	Application Approved June 2018

3.0 THE PROPOSED DEVELOPMENT

3.1 Introduction

- 3.1.1 This section provides a description of the development, operational layout, equipment and structures proposed within the site.
- 3.1.2 The proposed development is for an extension to a consented RPP facility, to add an additional generating capacity of 9.95MW of electricity at any one time. The facility will provide balancing services to National Grid to ensure the future security of the country's electricity supply/
- 3.1.3 National Grid owns and operates the national electricity network. They are obliged to ensure that the electricity supply system runs within specified limits. Many factors change these operating conditions, but none more so than the balance between the electricity being demanded by customers connected to the national network and the electricity generators available to produce the electricity they require.
- 3.1.4 The electricity generated will be produced by gas powered generator sets with electricity storage capacity provided within supplementary batteries. The facility will provide power to the local network distribution in a short space of time when demand is greater than available supply.

3.2 Proposed Layout

- 3.2.1 The site currently has consent for 5 gas powered generators, 2 battery storage units and associated transformers, supporting plant and security perimeter fencing. The proposed extension, as shown on drawing SRE1082/17/03, will consist of:
- 6 generator sets and 3 transformers;
 - 3 Battery Storage Units (contained within ISO containers);
 - Lube oil storage container;
 - Below ground cabling linking transformers to the compounds;
 - Internal service road; and
 - Crushed stone surfacing.
- 3.2.2 The proposed extension will comprise up to 6 generator sets providing 9.95MW of gas generated power and 10MW of container battery storage. The batteries will provide instant electricity to the grid when demand is required, however, the batteries can only provide this power for a limited period and are only designed to work while the gas engines are warming up to reach their optimal working capacity. The gas engines and batteries will not send power to the grid the same time, and the generating capacity will be limited to a maximum of 9.95MW. 3 transformers will control the electricity to the on-site substation. This will complement the consented 5 generator sets, 2 battery storage units and associated infrastructure on site.
- 3.2.3 The generator sets will be fuelled by gas that will be fed to site by pipeline from the nearby medium pressure gas main located adjacent to the site on Miners Road. It is considered that any works undertaken outside the site by the Distribution Network Operator (DNO) or utility companies to facilitate connections to electrical and / or gas supplies will be covered by alternative legislation in terms of the statutory powers they can apply. The batteries will be charged with power from the gas engines when there is no demand from the grid.
- 3.2.4 The generator engines will comprise a general arrangement of two generators for each transformer plus an appropriate number for the battery storage units. The generators will be located within individual modular acoustic enclosures, which are

constructed of galvanised steel protected by polyester powder coat paint. Drawing SRE1082/17/06 and Figure 3.1 provides elevations of the gas generator sets. Drawing SRE1082/17/07 and Figure 3.2 provides elevations of the battery containers.

Figure 3.1: Elevations of the gas generators

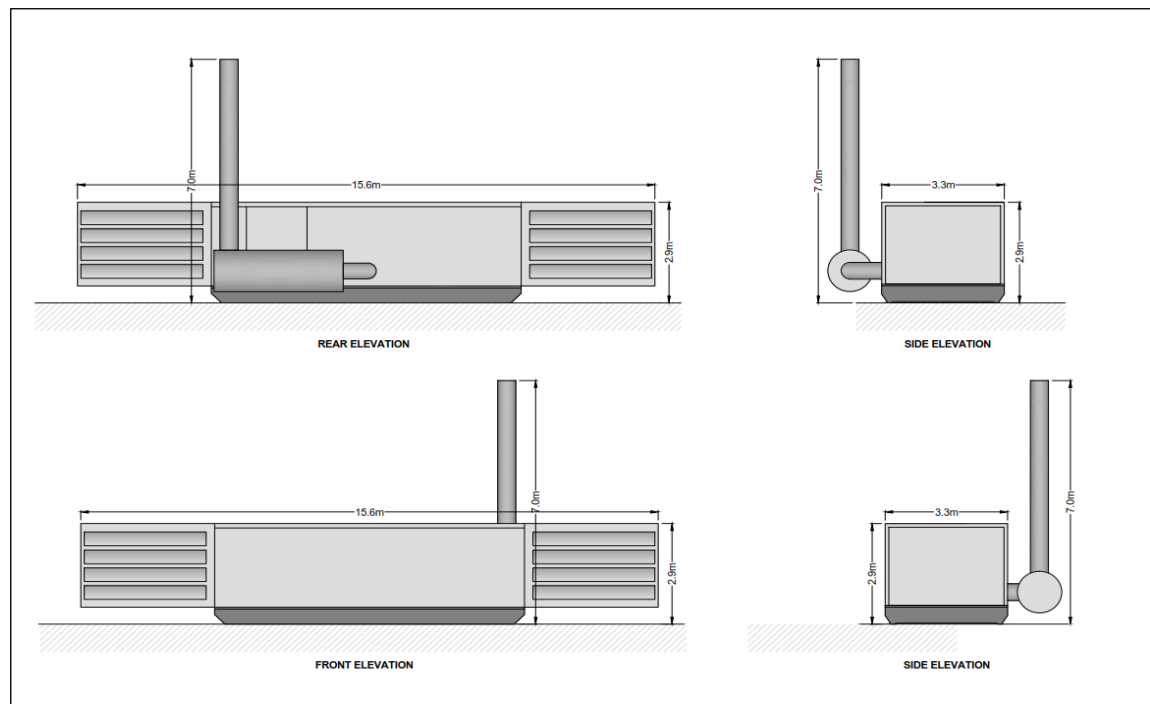
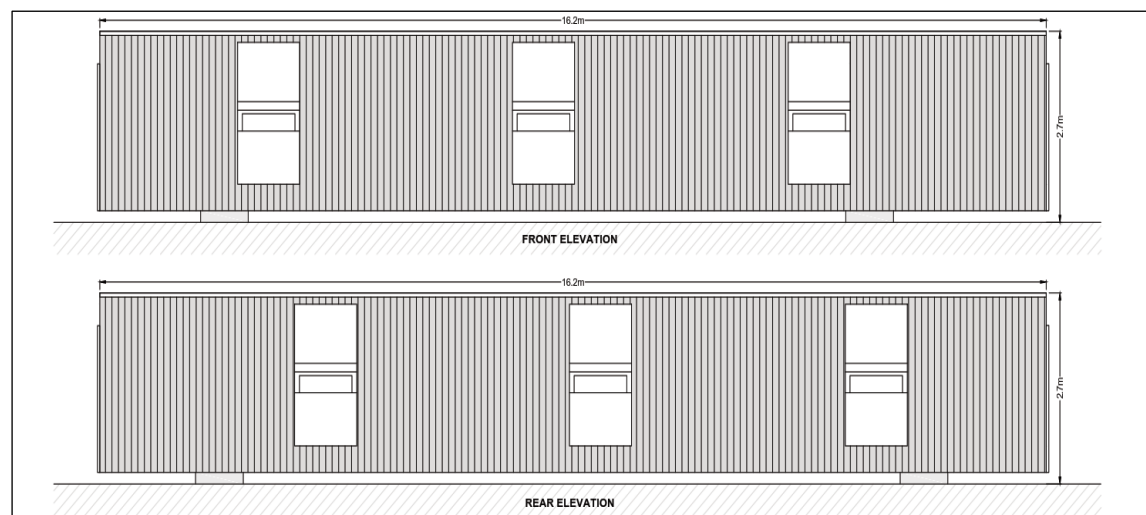


Figure 3.2: Elevations of the battery containers



- 3.2.5 The generators, battery storage units and transformers are temporary structures, which have an operational lifespan of around 10 – 15 years after which they would need replacing or overhauling as appropriate. However, the operational life of the RPP facility will not be time limited.
- 3.2.6 The cabling / service connections required to transfer the energy from the generators to the transformers will be below ground with trench depths being 600mm.
- 3.2.7 During the 4-month construction phase a temporary construction compound will be needed to accommodate welfare facilities and plant and equipment storage.

3.3 Operating Hours

- 3.3.1 The generators will operate when called upon by the National Grid and to recharge the batteries as necessary therefore their operation will be intermittent. The exact number of operational hours per year is not known, but it is not expected to exceed 3,500 hours per year, which is 40% of the total hours in a year. Given the location of the site, within an existing Industrial Estate, it is not considered necessary, and therefore not proposed, to limit the daily operating hours.

3.4 Scheme of Surface Water Management

- 3.4.1 The majority of the proposal site will remain permeable ground. The compounds will be surfaced in gravel and the internal access tracks will be compacted crushed stone. Given this and the size of the site, local hydrology will not be materially affected.

3.5 Local Distribution Network Connection

- 3.5.1 The point of connection to the local distribution network is adjacent to the proposed development site to the north. A below ground cable will link the facility to the point of connection.
- 3.5.2 Prior to exporting the electricity from the site to the electricity substation, on site substations are required to adjust the electricity to the relevant format and voltage prior to export. In addition, for comparison metering of the electricity generated by the facility a smaller 'customer' compound is required. These consented substations will take the form of a fenced compound containing electrical switchgear.

3.6 Site Security

- 3.6.1 The application site will be secured by a consented 2.4m paladin perimeter fencing under planning permission P/2017/0937. Infra- red (non-visible at night), inward facing pole mounted CCTV cameras (2.5m in height) will also be provided at appropriate intervals along the boundary fence. These will enable remote surveillance of the site. The CCTV cameras will be positioned to avoid views of private property.

3.7 Construction Programme

- 3.7.1 As with the construction for the consented RPP facility, the proposed extension is expected to take approximately 4 months. Chapter 3 provides details of proposed access arrangements, the anticipated programme, construction vehicle numbers and type, construction worker numbers and the proposed construction hours.

3.8 Site Access

- 3.8.1 The existing site access point off Miners Road will be utilised. A new consented site access gate, under planning permission P/2017/0937, will be provided off the existing access point. This access will serve the site during the construction and will provide on-going access during the operational phase for maintenance purposes.
- 3.8.2 An internal service road, which will measure 4.5m wide and finished with compacted crushed stone will then provide vehicular access within the site.
- 3.8.3 A temporary equipment set down compound will also be provided within the development boundary.

4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 Introduction

- 4.1.1 This chapter sets out the environmental assessments that have been carried out in support of the proposed Reserve Power Plant. Those environmental topics not requiring further consideration due to the likely negligible effects have also been set out.

4.2 Specific Environmental and Technical Assessments

- 4.2.1 The following environmental topics have been assessed:

- Landscape and Visual Impact Appraisal;
- Air Quality; and
- Noise

- 4.2.2 Appendices A - D present the detailed reports for these environmental topics.

4.3 Other Environmental and Technical Considerations

Ecology

- 4.3.1 Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid of vegetation. Under planning permission P/2017/0937 for the consented RPP, a working area for the site was defined which included areas for potential extension. Ecology mitigation, in the form of a GCN mitigation strategy (Appendix B) was also agreed under planning permission P/2017/0937.

- 4.3.2 The development only proposes to install equipment within the existing defined working areas and therefore the proposed extension would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the consented RPP.

Surface Water Drainage

- 4.3.3 The application site is located within Flood Zone A and is not at risk from flooding. Drawing SRE1082/17/03 identifies the areas within the application site that are permeable and impermeable. Surface water run-off from the development will be minimal, as much of the surface area is covered with permeable gravel. This will allow rainwater running off the equipment and onsite structures to soak away into the ground at the same rate as it does at present. Therefore, there is not considered to be any risk of surface water runoff causing flooding elsewhere.

Traffic and Transport

Construction Phase

- 4.3.4 Construction of the internal service tracks would be the first works on site, along with the setting out of the temporary construction compound.
- 4.3.5 All delivery traffic would use the existing site access of Miners Road which will be accessed from the east from the B5373. The A483 lies to the south-east of the site.
- 4.3.6 Construction staff would number typically up to 4 each day but are anticipated to travel to the site in up to 2 vans. Staff will be provided with a designated car parking area within a temporary construction compound. No construction vehicles will be allowed to park outside of this area.
- 4.3.7 To ensure that the identified route is adhered to by all vehicles accessing the site, a routing plan will be provided to all contractors and construction staff.

- 4.3.8 Delivery vehicles will be restricted to the internal service tracks, at no time will they manoeuvre within the wider application site. This will reduce the amount of debris leaving the site and dropped onto Miners Road. In addition to this the highways will be monitored daily and swept when required.
- 4.3.9 All materials can be transported to the site in regular HGV Lorries with no special requirements or abnormal loads.
- 4.3.10 Table 4.1 below identifies that the RPP including both the consented facility and proposed extension, would generate up to 107 HGV movements. The movements will be required to deliver all equipment and materials to the site during the construction phase. This would be spread out over approximately 4 months in order to minimise the amount of equipment stored on site.

Table 4.1: Indicative HGV Movements

Construction Activity	Month			
	1	2	3	4
Delivery of plant, equipment and (track) materials	15			
Erection of security fencing and construction compound	5			
Cabling on Site	5			
Compound Surfacing		30		
Delivery of generator sets, transformer & control equipment			40	
Removal of plant and equipment				12
Total deliveries	25	30	40	12

- 4.3.11 Assuming a 6-day working week (and a 4-week month), the average daily HGV deliveries during the 4-month construction phase would be 1, or 2 vehicle movements. It is considered this would not have a material impact on highway congestion or safety.

Operational Phase

- 4.3.12 During the operational phase traffic generation would be from the occasional maintenance and inspection. It is considered that this minimal increase in vehicular traffic will be imperceptible and well within the capacity of the local road network.

Cultural Heritage

- 4.3.13 The proposed development is located on a plot of land within Llay Industrial Estate. There are no listed buildings or Scheduled Ancient Monuments within the industrial estate. The only historical archaeological record within the industrial estate is 350m north-east of the site and relates to the Llay Main Colliery Branch Railway. Given the separate distance between the site and any historic designations and the existing surrounding industrialised area, the proposed extension is unlikely to cause impact upon archaeology and cultural heritage features.

5.0 PLANNING POLICY AND MATERIAL CONSIDERATION CONTEXT

5.1 Introduction

- 5.1.1 This section sets out the planning policies and material consideration which are relevant both to the site and the type of development proposed, giving consideration to National and local planning policies and emerging Local Development Plans
- 5.1.2 Section 38 of the Planning and Compulsory Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 5.1.3 Given the primacy of the development plan in the decision-making process, it is imperative that this Planning Statement identifies and summarise the planning policies that are of relevance in determining this planning application.
- 5.1.4 The proposed development site falls within the administrative boundaries of Wrexham County Borough Council. The adopted Development Plan comprises:
- Wrexham Unitary Development Plan (2005)

5.2 The Development Plan

Wrexham Unitary Development Plan

- 5.2.1 The Wrexham Unitary Development Plan was adopted in February 2005 and provides guidance as to the Council's policies, forming the basis against which all development proposals in the county are decided.
- 5.2.2 Under the adopted plan the site is an unallocated parcel of land within the development limits of Llay.
- 5.2.3 The following table provides an assessment of policies within the Wrexham Unitary Development Plan which are considered relevant to the proposed development.

Table 5.1: Policy Appraisal – Policies from the Wrexham Unitary Development Plan

Policy	Commentary
<u>PS1 – The Broad Location of Development</u> <i>“New development for housing, employment, and community services will be directed to within defined settlement limits / employment areas.”</i>	The proposed development is for an extension to a consented Reserve Power Plant located within the Llay development limits. The proposed development is therefore considered to be in accordance with this policy.
<u>PS2 – The Broad Location of Development</u> <i>“Development must not materially detrimentally affect countryside, landscape / townscape character, open space, or the quality of the natural environment”.</i>	The application site is located within the Llay Industrial Estate. The development is appropriate to the industrial areas setting in terms of the design criteria and the assessments undertaken demonstrate the development will not have any detrimental effects on the quality of the environment. The proposed development is therefore considered to be in accordance with this policy.
<u>PS3 – The Broad Location of Development</u>	The proposed development is located on a brownfield site, a former storage facility for a

<i>“Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land...”</i>	road haulage business within Llay Industrial Estate. Thus, it is considered to be in accordance with this policy.
<u>GDP1 - General Development Principles</u> <i>“All new development should</i> <i>a) Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality...</i> <i>c) Make the best use of design techniques, siting and orientation in order to conserve energy and water resources</i> <i>d) Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality...</i> <i>f) Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development...</i> <i>h) Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.</i> <i>i) Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site...”</i>	The development is appropriate to the industrial areas setting in terms of the design criteria and will provide a visual improvement given the current derelict condition of the site. The development is an energy generation facility and therefore will not be utilising any energy and water resources. As per the consented facility, the extension will use the existing site access off Miners Road within the industrial estate. An internal service road will then provide vehicular access within the site. It is considered that the proposed extension will not have a significant impact on the existing highway network. An Air Quality Assessment (Appendix C) concluded that the air quality impacts due to the operation of both the consented RPP and the proposed extension will be insignificant. A Noise Assessment (Appendix D) concluded that the predicted noise contribution from the consented RPP and the proposed extension with mitigation measures show rating noise levels to range between 29dB and 30dB LAeq during maximum site operations. The BS4142 assessment shows that with appropriate mitigation the site can be designed to comply with relevant noise guidance and standards. Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid of vegetation. Under planning permission P/2017/0937 for the consented RPP, a working area for the site was defined which included areas for potential extension. Ecology mitigation, in the form of a GCN mitigation strategy (Appendix B) was also agreed under planning permission P/2017/0937. The development only proposes to install equipment within the existing defined working areas and therefore the proposed extension would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the consented RPP. The application site is located within Flood Zone A and is not at risk from flooding.

	The proposed development is therefore considered to be in accordance with this policy.
<u>EC4 – Hedgerows, Trees and Woodland</u> <i>“Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.”</i>	No trees or hedgerows are to be removed to facilitate the proposed development of the site. The proposed development is therefore considered to be in accordance with this policy.
<u>EC6 – Biodiversity Conservation</u> <i>“Development either within of close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including establishment of local nature reserves, will be supported.”</i>	Given the small scale of the application site and its distance from any designated ecological sites render the development proposals unlikely to negatively affect the integrity of any designated feature. Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid of vegetation. Under planning permission P/2017/0937 for the consented RPP, a working area for the site was defined which included areas for potential extension. Ecology mitigation, in the form of a GCN mitigation strategy (Appendix B) was also agreed under planning permission P/2017/0937. The development only proposes to install equipment within the existing defined working areas and therefore the proposed extension would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the consented RPP. Further ecological enhancements may be achieved through the installation of bat and bird boxes and an ongoing site management strategy. The proposed development is therefore considered to be in accordance with this policy.
<u>EC13 – Surface Water Run-off</u> <i>“Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.”</i>	Surface water run-off from the development will be minimal given that most of the surface area is covered with permeable gravel. This will allow rainwater running off the equipment and onsite structures to soak away into the ground at the same rate as it does at present. Therefore, there is not considered to be any risk of surface water runoff causing flooding elsewhere.

	The proposed development is therefore considered to be in accordance with this policy.
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5.3 Material Considerations

National Planning Policy – Planning Policy Wales (November, 2016)

- 5.3.1 In November 2016, the Welsh Government (WG) published an update to national planning policy in the form of the 9th edition of Planning Policy Wales (PPW). PPW sets out the land use planning policies of the WG.
- 5.3.2 Paragraph 4.2.2 states that:
- “The planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker when:*
- *Preparing a development plan; and*
 - *In taking decisions on individual planning applications”.*
- 5.3.3 One of the sustainable development principles within PPW is to tackle climate change by reducing the greenhouse gas emissions that cause climate change and ensuring that places are resilient to the consequences of climate change with the objective to *“maximise the use of renewable resources, including sustainable materials (recycled and renewable materials and those with a lower embodied energy). Where it is judged necessary to use non-renewable resources they should be used as efficiently as possible.”*
- 5.3.4 PPW identified a number of key policy objectives that relate specifically to renewable energy generation. One states that proposals should:
- *“...play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including waste management facilities and energy supplies) ...”*
- 5.3.5 PPW also highlights that the Welsh Government has set out to achieve annual carbon reduction-equivalent emissions reductions of 3 per cent per year from 2011 in areas of devolved competence, which include land use planning. Wales is also committed to achieving at least 40% reduction in all greenhouse gas emissions by 2020 against a 1990 baseline.
- 5.3.6 Whilst the proposed RPP facility does not constitute low carbon or renewable energy, electricity generation utilising gas as a fuel reduces carbon emissions by up to 40% when compared to coal. Furthermore, the nature, scale and function of the proposed development is such that it will support the broader strategy for renewable and low carbon energy by serving as a support mechanism to the National Grid to ensure efficiency during the transition to and reliance on alternative energies.
- 5.3.7 Paragraph 4.9.1 preference for the re-use of land states that:
- “Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value...”*
- 5.3.8 The site is brownfield land located within Llay Industrial Estate and was formally used as a storage facility for a road haulage business. The proposed development will improve the appearance of the currently derelict site.

Waste Spatial Plan

- 5.3.9 The Wales Spatial Plan provides context and direction of travel for local development plans and the work of local service boards. Whilst a Local Development Plan (LDP) must have regard to the Wales Spatial Plan, the Wales Spatial Plan is not part of the statutory development plan framework and as such, a LDP does not have to conform to it.
- 5.3.10 The 2008 version updates the 2004 adopted version of the Wales Spatial Plan. The Wales Spatial Plan sets out cross-cutting national spatial priorities. These provide the context for the application of national and regional policies for specific sectors, such as health, education, housing and the economy, reflecting the distinctive characteristics of different sub-regions of Wales and their cross-border relationships.

Technical Advice Notes (TANs)

- 5.3.11 Technical Advice Notes provide technical advice on a variety of topics to supplement the policy set out in Planning Policy Wales. The following TANs are considered to be of particular importance to the proposed development:
- Technical Advice Note (Wales) 5 (TAN5) – Nature Conservation and Planning;
 - Technical Advice Note (Wales) 8 (TAN8) – Renewable Energy;
 - Technical Advice Note (Wales) 11 (TAN11) – Noise;
 - Technical Advice Note (Wales) 12 (TAN12) – Design;
 - Technical Advice Note (Wales) 15 (TAN 15) – Development and Flood Risk; and
 - Technical Advice Note (Wales) 18 (TAN 18) – Transport.

Emerging Wrexham Local Development Plan 2

- 5.3.12 Wrexham Council are currently producing the Wrexham Local Development Plan 2 which, once adopted, will replace the current Unitary Development Plan. Consultation has been undertaken on the Preferred Strategy, and consultation on the Deposit Plan is currently taking place.
- 5.3.13 The following table provides an assessment of policies within the emerging Wrexham Local Development Deposit Plan which are considered relevant to the proposed development.

Table 5.1: Policy Appraisal – Policies from the emerging Wrexham Local Development Deposit Plan

Policy	Commentary
<u>SP2 – Location of Development</u> <i>“New development is directed to the defined settlement limits and employment areas as identified on the Proposal Map.”</i>	The proposed development is for an extension to a consented Reserve Power Plant located within the Llay development limits and employment area. The proposed development is therefore considered to be in accordance with this policy.
<u>SP15 – Natural Environment</u> <i>“Development will only be supported where it protects conserves and enhances the natural environment including:</i> • <i>Internationally protected Special</i>	Given the small scale of the application site and its distance from any designated ecological sites render the development proposals unlikely to negatively affect the integrity of any designated feature.

<i>Areas of Conservation, Special Protection Areas, and Ramsar Sites;</i> • <i>Nationally protected Sites of Special Scientific Interest and National Nature Reserves;</i> • <i>Protected Species and their habitat;</i> ... • <i>Local Wildlife Sites...;</i> • <i>Local Nature Reserves; ...</i> • <i>Natural landscape features such as trees, hedges and woodland and the green networks between them which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change;</i> • <i>The quality of natural services including water, air and soils;</i> • <i>Developing and maintain Green Infrastructure links; and</i> • <i>Habitats and species of principle importance in Wales.”</i>	Much of the site comprises habitats of negligible to low ecological value including hardstanding and bare ground devoid of vegetation. Under planning permission P/2017/0937 for the consented RPP, a working area for the site was defined which included areas for potential extension. Ecology mitigation, in the form of a GCN mitigation strategy (Appendix B) was also agreed under planning permission P/2017/0937. The development only proposes to install equipment within the existing defined working areas and therefore the proposed extension would have no additional impact on ecology and biodiversity and there is no further requirement for mitigation to that identified and agreed with Natural Resource Wales under the consented RPP. Further ecological enhancements may be achieved through the installation of bat and bird boxes and an ongoing site management strategy. The proposed development is therefore considered to be in accordance with this policy.
<u>SP19 – Climate Change</u> <i>“To mitigate against the effects of climate change and adapt to its impacts, development proposals will need to demonstrate that they have taken into account the following:</i> <i>i. Reducing carbon emissions; ...</i> <i>v. Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance; and</i> <i>ii. Preventing development that increases flood risk.”</i>	The proposed development is for an extension to a consented Reserve Power Plant. The electricity generated by the facility utilises gas as a fuel which reduces carbon emissions by up to 40% when compared to coal. In addition, the function of the proposed development is such that it will support the broader strategy for renewable and low carbon energy by serving as a support mechanism to the National Grid to ensure efficiency during the transition to and reliance on alternative energies. The application site is located within Flood Zone A and is not at risk from flooding. The proposed development is therefore considered to be in accordance with this policy.
<u>DM1 – Development Management Considerations</u> <i>“All development must</i> <i>a) Accord with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape / townscape in terms of its siting, layout, scale, height, design, density, use of materials and landscaping;</i> <i>b) Not have an unacceptable effect on</i>	The proposed development is located within the Llay Industrial Estate. The development is appropriate to the industrial areas setting in terms of the design criteria and will provide a visual improvement given the current derelict condition of the site. The environmental assessments, especially noise and air quality, demonstrate that the proposed facility (with mitigation) will not have any adverse effects on identified receptors.

<i>the amenity of the occupiers or nearby properties/land by virtue of noise, disturbance and overlooking; and provides a satisfactorily standard of amenity for the occupiers/users of the development itself;</i> c) <i>Safeguard the environment from the adverse effects of pollution of water, land, light or air arising from development; ...</i> f) <i>Not give rise to parking or highway safety problems on site or in the locality; ...</i> i) <i>Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment; ..."</i>	As per the consented facility, the extension will use the existing site access off Miners Road within the industrial estate. An internal service road will then provide vehicular access within the site. It is considered that the proposed extension will not have a significant impact on the existing highway network. The application site is located within Flood Zone A and is not at risk from flooding. Surface water run-off from the development will be minimal given that most of the surface area is covered with permeable gravel. This will allow rainwater running off the equipment and onsite structures to soak away into the ground at the same rate as it does at present. Therefore, there is not considered to be any risk of surface water runoff causing flooding elsewhere. The proposed development is therefore considered to be in accordance with this policy.
<u>NE3 – Trees, Woodlands and Hedgerows</u> <i>"Development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value or those that provide important ecosystems services including mitigating the effects of climate change..."</i>	No trees or hedgerows are to be removed to facilitate the proposed development of the site. The proposed development is therefore considered to be in accordance with this policy.
<u>EM1: Protecting of Existing Employment Land</u> <i>"The County Borough's existing employment areas as shown on the Proposals Map will be protected for B Use Class employment generating uses... 2. Llay Industrial Estate..."</i>	The proposed development is for the extension of a consented RPP facility within Llay Industrial Estate. The facility will provide essential infrastructure to make sure that surrounding homes and businesses will have significant electricity to meet their needs. Given the close proximity to the electrical and gas connection, the proposal site is also an effective location. Therefore, the proposal is in accordance with this policy.
<u>EM3: Alternative Use of Employment Land Premises</u> <i>"Development of business, industrial and warehousing land and premises for other uses will only be permitted if:</i> i. <i>The land or premises are no longer well located for business, industrial and warehousing units; or</i> ii. <i>There is no realistic prospect of</i>	The proposed development is for the extension of a consented RPP facility within Llay Industrial Estate. Given the environmental assessments presented in Appendices A – D demonstrate there is no adverse effects on identified receptors, the development is therefore an acceptable proposal in this location.

<i>employment use on the site and / or the property is physically unsuitable for employment use, even after adaption / refurbishment or redevelopment; or</i> <i>ii. There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide a range and choice of sites available for such use; and</i> <i>vi. There will be no unacceptable impact on the operating conditions of existing businesses.”</i>	Therefore, the proposal is in accordance with this policy.
<u>T1 – Managing Transport Impacts</u> <i>“Proposals for new development will be supported where they: ...</i> <i>i. Do not comprise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation; ...”</i>	As per the consented facility, the extension will use the existing site access off Miners Road within the industrial estate. An internal service road will then provide vehicular access within the site. It is considered that the proposed extension will not have a significant impact on the existing highway network. The proposed development is therefore considered to be in accordance with this policy.

6.0 SUMMARY & CONCLUSIONS

6.1 Introduction

- 6.1.1 This statement describes a proposal by Sirius Renewable Energy to extend the consented Reserve Power Plant (RPP) and associated infrastructure on land within Llay Industrial Estate, Wrexham. The RPP facility will provide energy balancing services to the national grid via the Government's recently introduced Capacity Market, as part of the Electricity Market Reform programme to ensure the future security of our electricity supply.

6.2 Environmental Effects

- 6.2.1 A number of environmental and technical assessments and considerations are set out in Appendices A – D and in Chapter 4. These consider the effects of the proposed development upon the application site and immediate environment.
- 6.2.2 Given the location of the application site, it is considered that the proposed RPP extension will create no significant environmental effects either locally or upon the wider area due to its scale and nature of the surrounding area.

6.3 Planning Policy & Material Considerations

- 6.3.1 The proposal has been considered in the context of national, and local policies and any other material considerations. The application site is located to the south of Miners Road on a brownfield plot within Llay Industrial Estate on a former storage facility for a road haulage business.
- 6.3.2 The proposal has been considered against relevant planning policy and is considered to be in accordance. Furthermore, material considerations in the form of the PPW weigh heavily in favour of the development.