



HOW

Planning and Environmental Advisers

**SUPPORTING PLANNING STATEMENT
FULL APPLICATION FOR THE REDEVELOPMENT
OF THE SITE FOR A BIOMASS FACILITY AT
BRYN LANE, WREXHAM
ON BEHALF OF GREEN PLAN ENERGY LTD**

JULY 2010

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APPENDICES

Appendix 1: Wrexham County Borough Council's Screening Opinion

Appendix 2: Proposed Site Plan

1. INTRODUCTION

- 1.1 This Supporting Planning Statement has been prepared by HOW Planning LLP in support of a full planning application on behalf of Green Plan Energy Ltd. The application relates to land off Bryn Lane, Wrexham.
- 1.2 This planning application seeks permission to redevelop the site for a proposed renewable energy generation facility, in the form of a biomass plant on the Bryn Lane site. The proposals are described in detail in section 3 of this statement and are fully illustrated on the submitted plans.
- 1.3 This statement is intended to set out the case for development and to address relevant planning policy considerations. It considers the proposed development in light of national and development plan policy guidance and assesses the compatibility of the development in planning policy terms.
- 1.4 This statement is divided into six sections (including this Introduction) as follows:
- **Site Location and Description** – A description of the site including location, characteristics, general surroundings and relevant planning history (**section 2**);
 - **The Proposed Development** – A description of the proposed development (**section 3**);
 - **Planning Policy Framework** – This section sets out the relevant planning policy (**section 4**);
 - **Conformity with Planning Policy** – Asses how the planning proposals conform with the relevant planning policy discussed in section 4 (**section 5**);
 - **Conclusions** – This section summarises the overall conclusions which support the case for the proposed development on this site (**section 6**).

- 1.5 The application is accompanied by a comprehensive suite of supporting documents and a number of plans. The scope and extent of supporting information has been prior agreed with Wrexham County Borough Council (WCBC) and has been subject to pre-application consultation with the Council. These are set out in the table below:

DOCUMENT	AUTHOR	DATE
Supporting Planning Statement	HOW Planning LLP	July 2010
Ecology Report	Marches Ecology	June 2010
Ecological Surveys and Mitigation Strategy	Derek Whitcher Wildlife Consultants	July 2010
Tree Survey	TEP	June 2010
Transport Assessment	Crowd Dynamics	June 2010
Air Quality, Noise and Vibration Assessment	Royal Haskoning	June 2010
Drainage Statement	Shepherd Gilmour	July 2010
Ground Conditions Desk Study	Shepherd Gilmour	July 2010

- 1.6 The proposals constitute Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 1999. Therefore, a Screening Opinion was requested from Wrexham County Borough Council, which was provided in a reply dated 16th December 2009 (included in Appendix 1). It is the Council's firm Opinion that the proposals do not constitute a development requiring an Environmental Impact Assessment.

2. SITE LOCATION AND DESCRIPTION

- 2.1 This section describes the application site, its surroundings, characteristics and local setting along with relevant planning history.

The Site

- 2.2 The site's location and edge red boundary are shown in Appendix 2 of this document. It is located off Bryn Lane and is located directly to the west of TDG's existing operations and to the east of Wrexham County Borough Council's Recycling Centre. There is a small building to the immediate south of the site that was once occupied by the Wrexham Model Car Club. To the north and north east is an area of open land currently used for cattle grazing. The site is not specifically allocated in the Wrexham Unitary Development Plan (UDP) however it is located within the boundary of Wrexham Industrial Estate as defined on the proposals map. The application site extends approximately 1.45 hectares (3.58 acres).
- 2.3 The site itself currently comprises a grassed plateau that sits approximately 2.5 - 3m higher than Bryn Lane. Small clusters of trees have been planted along the fringes of the site along the sloped embankments rising to the even plateau. A small area of bare ground is located in the southern section of the site consisting of a concrete slab which has been partly colonised by scrub vegetation.

Surrounding Land Uses

- 2.4 The site is located within the boundary of the Wrexham Industrial Estate which holds a variety of large buildings with a mixture of operating uses, such as large distribution depots. The majority of these complexes located within the Industrial Estate are concentrated to the south of the site, further along Bryn Lane. Moving further north from the site boundary along Bryn Lane and out of the settlement limits of the Industrial Estate, the area is characterised by a mosaic of agricultural land use fields and boarder treatments such as hedgerows, with a numbers of isolated farmsteads in the locality. At this point, Bryn Lane

connects to Hugmore Lane just north of the site. This route provides a strategic connection to the main A534 Wrexham Road.

- 2.5 As stated above, the uses that immediately surround the site include the TDG warehousing complex to the east and the Wrexham County Borough Recycling centre to the west. The Kellogg's plant is located adjacent to the recycling centre, north west of the site boundary.

Planning History

- 2.6 An application was submitted to Wrexham County Borough Council on the 10th September 2008 (application P/2008/0992). The outline application was for B1/B2/B8 development including access. The Council resolved to grant the application subject to a Section 106 Agreement.
- 2.7 In addition, to the immediate south of the site a change of use application was submitted to Wrexham County Borough Council on the 4th August 2009 (application P/2009/0653). The application was for the change of use of the existing social club to business premises consisting of offices, a workshop and for storage and distribution. The application was approved on the 24th September 2009.

3. DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 3.1 This section of the statement outlines the key elements of the development proposals as shown on the proposed site plan contained in Appendix 2.
- 3.2 The proposed changes are a redevelopment of the site for a proposed renewable energy generation facility in the form of a biomass plant. The facility will utilise one of the cleanest and more efficient methods of energy generation, one of the few technologies eligible for the governments' renewable obligation certificates at the highest level.
- 3.3 The proposed biomass plant will consist of two boiler-plant buildings located either side (north and south) of a central vehicle manoeuvring area, with a new access point to the site taken directly off Bryn Lane on the western boundary. Due to the topography of the site, this access will be in the form of a ramp taken from the lower level of Bryn Lane to the slightly elevated development platform level. A gated access is proposed which will be set back from Bryn Lane to ensure appropriate stopping distances for articulated lorries.
- 3.4 The facility will have an operating capacity of up to 3 MW and will be fuelled by clean wood-chip which would be delivered by road. The woodchip storage/preparation area will be to the east of the vehicle manoeuvring area which will be covered. The facility will have a throughput of no more than 62 tonnes per day operating at maximum capacity. As such, the site would receive approximately 3 articulated vehicles per day, which would all arrive and depart via the proposed new access on Bryn Lane. In addition to the movement of raw materials, the proposed facility will generate 12-15 full time permanent positions working on a shift rota. Therefore, 6 car parking spaces have been provided for within the layout of the facility along with an ancillary building for staff.
- 3.5 In terms of the facility's production, it will generate both electrical and heat energy. It is proposed that the generated electricity will be exported to the National Grid via a sub-station which will be located within the proposed facility. The excess heat will be recycled within the site.

- 3.6 The proposals will be built in two phases as shown on the proposed site plan. Phase One comprises 2 MW operating capacity and will be built towards the west of the site, in the closest proximity to the proposed sub station, whilst Phase Two will make up the remaining 1 MW, located on the eastern portion of the site.

4 PLANNING POLICY FRAMEWORK

- 4.1 This section provides a summary of planning policy at all levels which is of relevance to the Council's consideration of the application.

EU and UK Energy Policy

- 4.2 The use of renewable sources as an increasing proportion of our total energy consumption is seen as a key part of the ultimate sustainable solution, alongside energy efficiency and conservation especially as it does not rely on the consumption of fossil fuels. These objectives are defined in both European Union Law (for example the Directive on Renewables 2001/77/EC) and the UK Government Climate Change Programme and the Energy White Paper.
- 4.3 The EU has adopted a target that 20% of total energy use (electricity, heat and transport) across the Union should be sourced from renewable sources. The Commission has proposed that the UK's contribution should be to raise to 15% of the contribution from renewables of the UK's total energy needs.

Energy White Paper, 2007

- 4.4 The Energy White Paper 'Meeting the Energy Challenge' was published on 23 May 2007. It sets out the measures the Government intends to adopt to ensure long-term energy security and reductions in climate change emissions associated with energy generation. It includes policies to accelerate the deployment of renewable energy technologies.
- 4.5 The principal policy instrument for the promotion of renewable energy is the Renewables Obligation (RO), introduced in 2002. A key policy change foreshadowed in the 2007 White Paper is to strengthen and increase the level of the RO, taking it to 20%. In order to align the level of support more closely with the financial needs of the different renewable technologies and to ensure that it continues to provide a sufficiently strong incentive to develop the more 'difficult' technologies, the Government proposes to 'band' the obligation giving to different levels of support to different renewable technologies in order to maximise the

contributions from established and emerging technologies, of which biomass is one.

The UK Renewable Energy Strategy (July 2009)

- 4.6 This strategy sets a challenging target of 15% of the UK's energy is to come from renewables by 2020, which reflects EU policy requirements. The aim is that this will be delivered across the energy sectors of heat, electricity and transport. In meeting this target, the strategy outlines a target of 30% electricity supply is to be from a renewable source, in addition to a target of 12% of heat and 10% of transport.
- 4.7 As outlined in the strategy, the 15% figure is based on forecasting the amount of energy demand in the target year of 2020. It states that in order to meet the target of 15%, the UK would have to increase the contribution of supply from renewables from nearly 40 TWh in 2008 to just under 240 TWh in 2020. It is anticipated that this will be achieved using the targets set out above which cover the three main energy sectors.

National Planning Policy Context and Guidance

- 4.8 At the national level, current planning policy guidance on sustainable development and renewable energy development is set out in The Wales Spatial Plan, Planning Policy Wales (PPW) and a series of supporting Technical Advice Notes (TANs). More specifically, TAN 8 provides technical advice to encourage renewable energy development and supplements policy set out in PPW. A summary is provided below.

The Wales Spatial Plan – People, Places, Futures (2008 update)

- 4.9 The Wales Spatial Plan was originally adopted by the National Assembly for Wales in November 2004 however this has been superseded by the 2008 update. The Spatial Plan seeks to ensure that new development is sustainable and sets out a shared vision for Wales. The Spatial plan identifies 6 sub-regions within Wales and sets out the key spatial objectives and development targets for each of these

areas. The vision and key objectives are seen as important considerations in a regional context and should inform local development plans. The key elements for realising this vision for North East Wales (within which Wrexham lies) include strengthening key hubs as a focus for investment in a sustainable future.

- 4.10 Central to the entire vision is the promotion of sustainable development, which is at the heart of the strategy, especially regarding the need to address and respond to climate change.

Planning Policy Wales (Edition 2, June 2010)

- 4.11 Planning Policy Wales (PPW) sets out the Welsh Assembly Government's sustainable land use policy. This provides the context within which Unitary Development Plans are prepared and development control decisions on individual planning applications and appeals are taken. PPW is supplemented by a series of Technical Advice Notes (TANS); together with Welsh Office Circulars this comprises the range of national planning policy.
- 4.12 PPW is underpinned by the principles of sustainable development. This means that sustainability is placed at the heart of the decision making process. This is reflected in the pursuit of five key objectives:
- *Living within environmental limits:* by setting out a pathway to using only our fair share of the Earth's resources and becoming a One Planet nation within the lifetime of a generation;
 - *Ensuring a strong, healthy and just society:* their focus on how a sustainable approach will improve the quality of life and well-being of the people of Wales and especially those in their less well-off communities;
 - *Achieve a sustainable economy:* by setting out how to transform the economy to one that is low carbon, low waster;
 - *Promoting good governance:* through confirming sustainable development as the central organising principle of the Welsh Assembly Government and through encouraging and enabling other to embrace sustainable development as their central organising principle; and

- *Using sound science responsibly:* through the use of sustainable development principles as part of their evidence-based approach to policy making.
- 4.13 The Assembly Government's Environmental Strategy and Action Plan sets out the long term strategy for the Welsh environment. It contains details of specific additional actions which should be taken in order to plan for climate change. The five main themes of the Strategy are as follows:
- Addressing climate change;
 - Sustainable resource use;
 - Distinctive biodiversity, landscapes and seascapes;
 - The local environment; and
 - Environmental hazards
- 4.14 As such, PPW provides the strategic policy framework to promote a sustainable future for Wales with renewable energy seen as key in ensuring this future is realised.

Ministerial Interim Planning Policy Statement 01/2008 (Planning for Good Design)

- 4.15 The statement provides guidance on Design and Access Statements and advocates an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposed. A Design and Access Statement accompanies this application.

Ministerial Interim Planning Policy Statement 01/2009 (Planning for Sustainable Buildings)

- 4.16 This statement provides guidance on how the Assembly Government is to move towards more sustainable and zero carbon buildings. Of relevance it states that for applications for non residential development which will either have a *'floorspace of 1,000 sqm or more, or will be carried out on a site having an area of one hectare or more to meet the Building Research Establishment Environmental*

Assessment Method (BREEAM) 'Very Good' standard and achieve the mandatory credits for 'Excellent' under issue Ene1 – Reduction of CO₂ Emissions'. The accompanying Design and Access Statement outlines the commitment to meeting these standards.

Technical Advice Notes (TANs)

- 4.17 There are a number of Technical Advice Notes which should be read in conjunction with Planning Policy for Wales, together with the published Ministerial Statements they make up national planning policy. Those which are relevant are discussed below.

TAN 8 – Renewable Energy (2005)

- 4.18 This guidance note sets out the Assembly Government's position on energy policy including the land use considerations of renewable energy and targets for energy production and efficiency. It reinforces the Assembly Government's renewable energy targets for 2010 and 2020 and states that by 2010 4TWh of electricity per annum should be produced from renewable energy and 7TWh by 2020. Importantly, it states that in order to meet these targets, 800MW of additional installed capacity is required from onshore wind sources and a further 200MW of installed capacity is required from off shore wind and other forms of renewable technologies. Although these targets are primarily focused on wind turbine technology, it goes on to state that Local Planning Authorities should develop appropriate policies so that they put in place a comprehensive framework for other forms of renewable energy. In addition, the guidance is quite clear in that the planning system is central to delivering the targets outlined by enabling the deployment of all forms of renewable energy technologies in Wales.
- 4.19 It notes that as well as developing new sources of renewable energy which are essential to meeting the targets set by energy policy, the Assembly Government is fully committed to promoting energy efficiency and energy conservation. In doing so, the guidance acknowledges that energy conservation is heavily influenced by design issues and therefore refers to TAN 12 in this regard. This guidance states that design, infrastructure and site layout are key to achieving energy efficient development. Further guidance on ensuring the delivery of

sustainable buildings is provided in the recently published TAN 22 as discussed below.

TAN 22 – Planning for Sustainable Buildings (2010)

- 4.20 This TAN gives technical guidance on delivering sustainable buildings through the planning system stating that it is the aspiration of the Assembly Government that all new buildings should achieve aim to achieve a zero carbon standard. It states that in line with PPW, a minimum sustainable building standard will be expected to be achieved for most new planning applications for residential and non residential development. In achieving such standards, the TAN provides an introduction into the definition of sustainable buildings and the standards of assessment, the design solutions which may be employed in meeting these standards, and further design guidance on delivering low carbon buildings.
- 4.21 For non residential developments, the TAN provides an outline of the BREEAM (Building Research Establishment Environmental Assessment Method) standards. It notes that the standards established under the BREEAM scheme for non-residential development form a useful framework for energy efficiency consideration. The Design and Access Statement submitted in conjunction with this application contains further details on proposed energy reduction techniques and sustainability techniques to achieve a BREEAM rating of 'Very Good'.

TAN 5 – Nature Conservation and Planning (2005)

- 4.22 TAN 5 sets out further guidance in relation to nature conservation and planning, including the protection and enhancement of biodiversity and geological conservation. It summarises the position as set out in Planning Policy for Wales in relation to the conservation of internationally and nationally designated sites and habitats and also covers local sites. In particular, it deals with the conservation of protected and priority species. Reference is also made to their habitat requirements and the implications of such for new development. Full account has been given to the site's biodiversity as outlined in the accompanying Landscape and Ecological Framework.

TAN 18 – Transport (2007)

- 4.23 This TAN gives technical guidance on the provision of transport infrastructure and services, which improve accessibility, build a stronger economy, improve road safety and foster more sustainable communities. This includes the integration of transport with land use planning, the integration between different types of transport, and integration of transport with the environment, education, social justice, health, economic development and wealth creation; all of which should be taken into consideration regarding development proposals.

Local Planning Policy ContextWrexham Unitary Development Plan (UDP) (February 2005)

- 4.24 The Wrexham UDP covers the administrative area of Wrexham County Borough Council. It supersedes previous adopted development plans, namely the Wrexham Maelor Plan, the Glyndwr Local Plan and the Clwyd Structure Plan. The following is a summary of policies contained within the adopted UDP which are considered to be relevant to the evaluation of the planning application.
- 4.25 Policy PS1 – is one of several Part One strategic policies. This policy states that new development for housing, employment and community services will be directed to within settlement limits/employment areas. The site is located within the settlement limits of the Wrexham Industrial Estate on unallocated land.
- 4.26 Policy PS2 – States that development must not materially detrimentally effect countryside, landscape/townscape character, open space, or the quality of the natural environment.
- 4.27 Policy PS3 – States that development should use previously developed brownfield land in preference to the use of greenfield land particularly where greenfield land is of ecological, landscape or amenity value or comprises agricultural land of grades 1, 2 or 3A.

- 4.28 Policy PS4 – Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.
- 4.29 Policy PS12 – Proposals for the generation of energy from renewable sources will be supported provided that the wider environmental benefits are not outweighed by any detrimental impacts of the proposed development on the landscape, public safety, and the local environment. As discussed in detail below, it is considered that there will be no detrimental impact in this regard.
- 4.30 The UDP sets out a number of Development Objectives, as outlined in policy GDP1 which states that all new development should:
- 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 locality;
 - Take account of personal and community safety and security in the design and layout of development and public/private spaces;
 - Make the best use of design techniques, siting and orientation in order to conserve energy and water resources;
 - Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality;
 - Ensure that built development is located where it has convenient access to public transport facilities, and is well related to the pedestrian and cycle routes wherever possible;
 - 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 industrial and quarrying, and associated noise, odour or vibration arising from development;
 - Secure public services (e.g. gas, water, electricity) to development at the minimum costs;
 - Safeguard sites and areas of nature conservation and wildlife interest, and provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest;

- Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site;
- Secure the development of sustainable communities, through the promotion of the economic, social and environmental wellbeing of the area.

- 4.31 Policy EC4 states that 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. As outlined in the accompanying Landscape and Ecological Framework new planting is proposed as part of the proposed development.
- 4.32 Policy EC6 'Biodiversity Conservation' states that development either within or 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. Furthermore, it states that where such development is permitted, losses should be kept to a minimum, and compensatory measures should be provided. The accompanying Landscape and Ecological Framework outline proposals for habitat creation and enhancement on the site to ensure a net gain of biodiversity at the site.
- 4.33 Policy EC13 – This policy states that development which would result in unacceptable adverse impact on the water environment due to additional surface run-off will not be permitted. The accompanying Drainage Statement demonstrates that greenfield runoff rates can be accommodated on the site and so there will be no adverse impact on the water environment due to additional surface water runoff.
- 4.34 Policy E4 states that employment development on unannotated land within settlement limits will be permitted subject to Policy GDP1. The supporting text of the policy goes on to state that such developments should contribute to the economic use of land, avoids pressure on the countryside, and serves to remove the detrimental effect of blight within settlements. It is considered that the proposed development does contribute to the economic but also sustainable use of the land. The site is also located within an area of existing industrial

development and therefore avoids pressure on the countryside whilst ensuring the sustainable use of previously developed land.

Supplementary Planning Guidance

- 4.35 There are a number of local planning guidance notes which have been taken into account in the development of the application proposals. These comprise:

LPG Note 6 – Access to and the use of buildings (September 2004);

LPG Note 7 – Landscape and development (November 2003);

LPG Note 17 – Trees and Development (April 2006);

LPG Note 22 – Sustainable Building (July 2004);

LPG Note 26 – Landscape and Industrial Development (November 2003);

LPG Note 29 – Employment Development and Nature Conservation (August 2009)

Emerging Policy: Wrexham Local Development Plan

Deposit Wrexham Local Development Plan (Consultation – June 2010)

- 4.36 This document is currently under-going consultation and brings together the outcome of the 'Issues and Options' and the 'Preferred Strategy' documents, previously published by Wrexham Council. In essence, it sets out a vision and objectives for the development of the County Borough, along with a range of policies which will be used to determine planning applications up to 2021. It also includes proposals maps which set out where new development such as housing, employment and retail will be acceptable and also areas that are protected from development.
- 4.37 The vision and strategy focuses on the following:
- Maximising the use of previously development, under-used or vacant land (brownfield land);
 - Confining development to existing settlement limits;
 - Focusing investment to Wrexham and the Wrexham Industrial Estate;
 - Directing some development to the Western Villages of Acrefair/Cefn Mawr, Broughton, Brymbo, Chirk, Coedpoeth, Gwersyllt, Llay, Penycae,

Rhos/Johnstown, Rhostyllen, Ruabon, Tanyfron and Southsea in order to encourage social, economic and environmental regeneration in these areas;

- Restricting large-scale new development in the more rural settlements without adequate community facilities, transport networks and infrastructure capacity;
- Promoting an integrated transport system, enhancing public transport, walking and cycling facilities and;
- Protecting areas of high quality landscape, nature conservation interest and the historic environment mainly located in the Rural Hinterland.

4.38 The proposals will assist in contributing toward the vision set out in the preferred strategy by maximising the use of previously developed land within the settlement limits of the Wrexham Industrial Estate whilst enhancing and strengthening its employment role in the borough and sub region. In addition, the proposals constitute a highly sustainable development which will contribute to meeting the energy targets set out in national policy which also underpins the emerging Local Development Plan.

4.39 Although this document has not been adopted, and is only one document in a line of publications, it should be noted as a material consideration within this Supporting Planning Statement in relation to the development proposals put forward in this application.

5 CONFORMITY WITH PLANNING POLICY

- 5.1 The preceding chapters have described the site location, proposed development, and the relevant planning policy framework which should be considered in relation to the development proposals put forward by this application. This section considers the application proposals compliance with the local, regional and national policy described in the previous chapters.

Need for the Proposals

- 5.2 In the context of national policy drivers, the need for the development is geared towards achieving the objectives set out by the EU's target for renewable energy generation and the UK's own targets under the Renewables Obligation (RO).
- 5.3 As previously stated, the UK has accepted a 15% policy requirement of the amount of energy which should come from renewable sources by 2020. This is broken down into specific targets across three energy sectors;
- 30% of electricity should be generated from renewables by 2020;
 - 12% of heat should be generated from renewables by 2020; and,
 - 10% of transport should be generated from renewables by 2020.
- 5.4 In terms of electricity generation a target of 30% renewable contribution is set. However, according to recent energy trends (as published by DECC in June 2009); the UK is significantly lagging behind its installed operational capacity requirements for renewable electricity under RO. In 2008, the percentage of electricity derived from renewable sources generated from technology eligible under the RO was 5.3%, with growth of just 3% over the past 5 years. Therefore, based on the current contribution, it is very doubtful that the 2010 target under RO is to be met and in order to meet the target of 30% as outlined in the strategy (a 10% increase as outlined in the RO) deployment rates of renewable projects will have to be increased significantly.
- 5.5 It is highly questionable whether this 30% target is feasible given the UK's current position and it clearly represents a major challenge for this sector. Nevertheless,

it is one which the strategy predicts can be met but notes that 'a radical increase in current rates of deployment will be required' and that 'each sector will have to deliver at close to its maximum potential in order for the UK to meet the renewable energy target'. It cannot be emphasised enough that in order to meet these challenging targets that deployment rates of renewable energy projects needs to be increased significantly from the current situation and it is considered that the proposals represent an opportunity to increase renewable energy exportation to the national grid.

- 5.6 For Wales, TAN 8 outlines a target of delivering 4TWh of renewable energy generation per annum by 2010 and 7TWh by 2020. In order to meet this target, TAN 8 states that an additional 800MW of installed capacity should be delivered from onshore wind sources and another 200MW from offshore wind and other renewables. However, according to a report published by the British Wind Energy Association (BWEA)¹ only 102.5MW of additional capacity has come online since July 2005 when the targets were set. It is therefore apparent that the 2010 target will not be met based on the current rate of deployment and like the overall delivery in the UK; it is questionable whether the 2020 target will also be met.
- 5.7 At the Local Level, an 'Assessment of Renewable Energy and Energy Conservation Measures' report was published in 2007 to assist Wrexham County Borough Council in formulating their Local Development Plan. The report states that Wrexham County Borough Council accounts for about 4.4% of the total energy consumption in Wales with the electricity generated from renewable sources equivalent to about 1.6% of the County's electricity consumption, compared to 3.6% for Wales as a whole.
- 5.8 More specifically, Wrexham's installed renewable energy generation capacity amounts to 7MW. This contribution is from landfill gas only. Therefore, it can be concluded that at present there is a significant gap between installed capacity both within Wrexham and Wales and the renewable energy targets outlined in national policy. Furthermore, the report states that 134MW are needed if Wrexham is to meet a 10% target. Therefore, even if the current planned capacity of 29MW is delivered it is still questionable that the 2010 and the 2020 targets

¹ Wind Energy in Wales – State of the Industry. Report by BWEA Cymru, 16th July 2009

would be met. This further emphasizes the need for a rapid increase in deployment rates of renewable energy technologies at the local level if Wrexham and indeed Wales are to meet their energy targets.

Planning Policy

- 5.9 In terms of development plan policy, it is considered that the proposals are in line with the National Planning Policy and Guidance outlined in Chapter 4. The Wales Spatial Plan (2008 update) highlights the importance of sustainability, whilst simultaneously encouraging the regeneration and driving forward economic growth. In particular, it highlights the need to address and respond to climate change which, in turn feeds into Planning Policy Wales (Edition 2, June 2010), and is of key importance to the development proposals put forward in this application. The development of new sources of renewable energy are essential to meeting the targets set by energy policy and the proposals put forward within this application would help to achieve this.
- 5.10 The proposed facility will utilise one of the cleanest and more efficient methods of energy generation, thus helping to fulfil the key objectives put forward within both The Wales Spatial Plan and Planning Policy Wales, which are, as previous stated, centred around the principles of sustainable development. As outlined previously, such technology will therefore help to contribute to national targets for renewable energy provision whilst also contributing to the reduction of carbon dioxide emissions.
- 5.11 The proposals follow The Welsh Assembly Government's Environmental Strategy and Action Plan's aims of promoting sustainable development, utilising renewable resource use and addressing climate change. Due to the fundamental principle behind the facility, i.e. the generation of electricity and heat through renewable technology, the proposals take a long term perspective to responding to climate change, thus cementing the sustainable credentials of this application.
- 5.12 Not only do these proposals conform with issues surrounding sustainability in the promotion of new technology to encourage the generation and use of renewable and low carbon energy sources at all scales, but also in more general principles

that form a key component to the Assembly Government's approach. National policy states that economic development should respect the environment and be appropriate in terms of location, scale and design, and the proposed development adheres to this.

- 5.13 The proposals are located within a predominantly industrial area, on previously developed land. In this sense, it promotes an efficient built pattern in relation to the surrounding uses. This location has, as far as is reasonably possible, applied the proximity principle by minimising the need for travel and thus the use of non-renewable resources.
- 5.14 The proposals have also assessed the impact of development on the environment whilst having regard to mitigation measures. A managed grassland corridor would be provided which will surround the built form of the facility on all sides, thus promoting species diversity. A number of habitat features will also be created within the site providing valuable ecological wildlife habitats. Such attention to the local environment conforms with national policy which highlights the importance of integrating conservation, protection and enhancement of the natural environment with development.
- 5.15 By taking access from Bryn Lane, the proposals would utilise the existing transport infrastructure, without adding excessively to the current flow of traffic or impacting significantly on the safety and convenience of other users. As previously mentioned, this facility is located in a predominantly industrial area, on previously developed land, and is therefore compatible with the surrounding uses.
- 5.16 At the local scale, the Wrexham UDP (February 2005) forms the key local planning policy framework which is considered relevant to the evaluation of the development proposals put forward within this application. It follows on from National Policy, with many objectives mirroring those already discussed.
- 5.17 Part One of the UDP includes several strategic policies, which give an overall grounding to the rest of the plan. The proposed facility discussed in this Supporting Planning Statement adheres at all those listed within Chapter 4 as being of relevance, and in order to minimise repetition, are summarised below:

Policy PS1: The development is directed within close proximity to an existing industrial area, providing employment.

Policy PS2: Due to the environmental mitigation measures explained above, the development would not detrimentally affect the quality of the natural and local environment.

Policy PS3: The facility would be located on previously development land.

Policy PS4: The proposed development would maintain the existing pattern of development and also be integrated within the existing transport network.

Policy PS12: Due to the careful design and environmental mitigation measures incorporated within the site, the wider environmental benefits gained from the generation of energy from renewable resources significantly outweigh any detrimental impacts resulting from the development itself.

5.18 The Wrexham UDP also lists several Development Objectives, as outlined in GDP1, which state that all new development should adhere to a number of objectives. The proposals described within this application conform to those objectives which are of relevance due to its appropriate location, scale, design and layout, including vehicular access and nature of development.

5.19 Of particular interest are the following policies, again summarised for brevity:

Policy E4: The development proposals in question have provided for the management of natural landscape features, including new planting.

Policy EC6: Measures to improve biodiversity and landscape quality have been included within the proposed development.

Policy EC12: No part of the site is subject to severe flooding, and development on it will be very unlikely to affect flood management and maintenance schemes elsewhere.

Policy EC13: The proposed development will not result in unacceptable adverse impact on the water environment due to additional surface run-off.

Policy E4: As the site lies in un-annotated land within settlement limits, development will be allowed as long as those objectives listed in Policy GDP1 already discussed are adhered to.

Policy T6: The proposed access will utilise the current transport framework, but also give due regard to the nearby primary and core highway network, to ensure the free and safe flow of traffic.

5.15 In relation to emerging policy, the Deposit Wrexham Local Development Framework is currently undergoing consultation. Although it is not current legislation, these proposals have noted it as a material consideration in terms of adhering to Wrexham Borough Council's vision for the area. The strategy builds on local policy previously discussed within this chapter, and focuses specifically on maximising the use of previously developed land, confining development to existing settlement limits, focusing investment to the Wrexham Industrial Estate, promoting integrated transport systems and protecting the natural environment. Such aims correlate with the development proposals put forward within this application.

6 CONCLUSION

- 6.1 This Planning Statement has been prepared by HOW Planning LLP in support of a full application on behalf of Green Plan Energy Ltd. It relates to land off Bryn Lane, Wrexham.
- 6.2 The Statement considers the development in light of national, regional and local planning policy, demonstrating that there is a overwhelming need for increased deployment of renewable energy technologies both locally and within Wales. As such it is considered that the proposed development can provide a positive contribution to national and local renewable energy targets.
- 6.3 The proposals are fully in accordance with the relevant policies of Wrexham's UDP in that they seek to develop previously developed land at an appropriate location and due to the proposed sensitive scale, layout and design. In particular, it would contribute to renewable energy provision whilst also contributing to the reduction of carbon dioxide emissions.
- 6.4 As no policy allocations are outlined in the UDP's proposals map, an assessment has been undertaken based on the criteria outlined in the policies of the UDP. The assessment has demonstrated compliance, and as a result, we request that the application be approved accordingly.

HOW Planning LLP

July 2010

This report has been prepared by HOW Planning LLP, with all reasonable skill, care and diligence. The scope of this report is subject to specific agreement and has been prepared solely for the benefit of our Client and should not be relied upon by any other party. Any third parties that use this information do so at their own risk. HOW Planning LLP accepts no responsibility for information contained within this report that has been independently produced or verified.

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APPENDIX 1:
WREXHAM COUNTY BOROUGH COUNCIL'S SCREENING OPINION

Chief Planning Officer/Prif Swyddog Cynllunio
Lawrence Isted

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Fao Elizabeth Lees

Your Ref/Eich Cyf
Our Ref/Ein Cyf
Date/Dyddiad
Ask for/Gofynner am
Direct Dial/Rhif Union
E-mail/E-bost

JGK/P/2008/0992 & SO/2009/25
16 December 2009
Gerry Kellett
01978 292476
gerry.kellett@wrexham.gov.uk

Visit our website at:
www.wrexham.gov.uk

Dear Sirs

Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999

**Proposed redevelopment of site for renewable energy generation facility
Request for screening opinion.**

Land at Bryn Lane, Wrexham Industrial Estate, Wrexham

I refer to your letter dated 1 December and your request for a screening opinion in relation to the above.

I can confirm that the proposed development is **not** categorised as any of the activities under Schedule 1 of the Regulations, for which the submission of an EIA is mandatory. As such, it is appropriate to consider the proposed development in the context of paragraph 3(a) (Energy industry - Industrial installations for the production of electricity, steam and hot water) under Schedule 2 of the Regulations. The proposal has a site area of approximately 1 hectare (exceeding 0.5 hectares). The test of whether the proposal is EIA development is whether it would have significant effects on the environment by virtue of its size, nature or location with specific reference to Schedule 3 of the Regs. These thresholds determine whether a development falls within Schedule 2 of the regulations whereby an EIA may be required if the development has the potential to generate significant effects.

I have given careful consideration to the possible environmental impacts of the development and I have concluded that there will be no significant environmental impacts that would justify a decision to require an Environmental Impact Assessment.

A formal Screening Opinion has been given upon the proposal and I enclose a copy for your information. Should you require any further explanation or information, please do not hesitate in contacting me.



INVESTOR IN PEOPLE
BUDDSODDWR MEWN POBL

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'L. M. C.', written over a dotted line.

Chief Planning Officer

Bryn Lane, Wrexham Industrial Estate, Wrexham

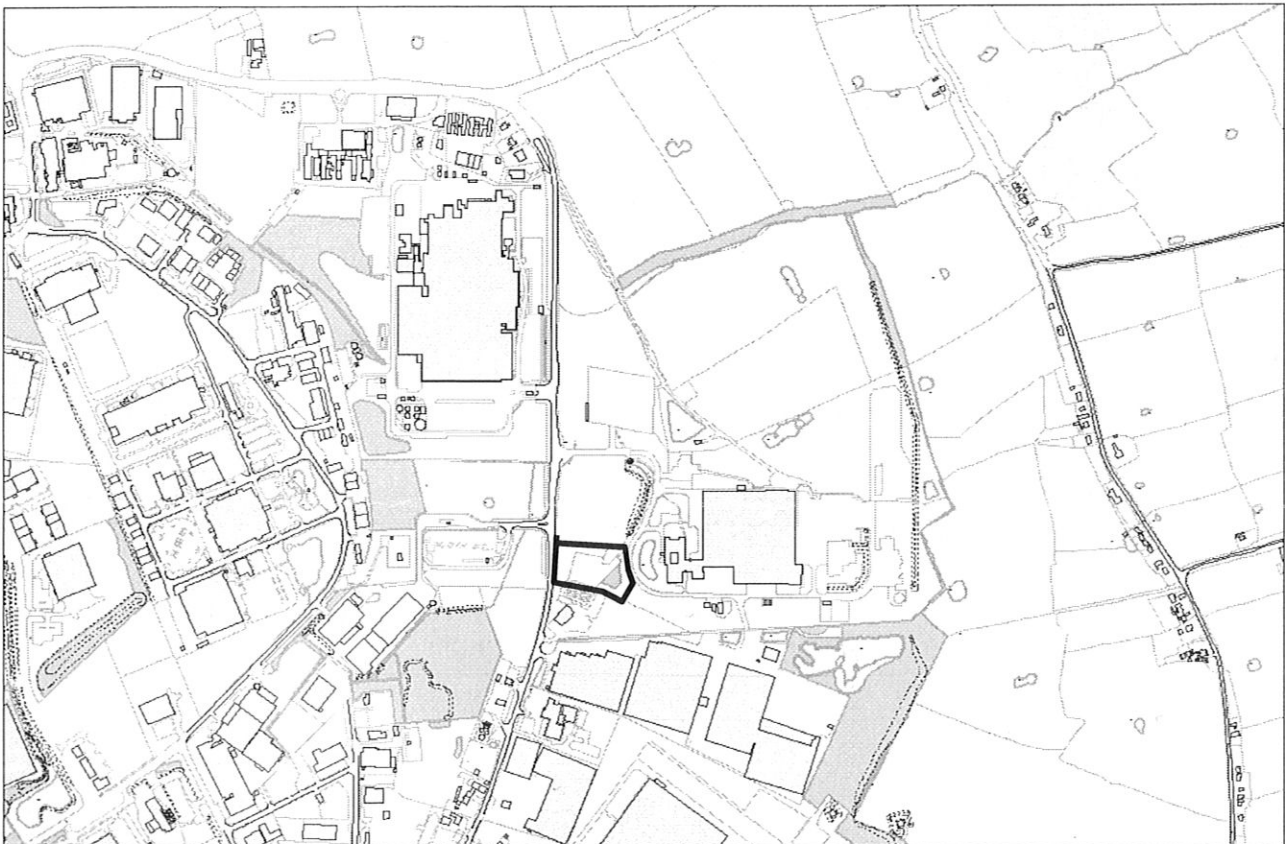
**Town and Country Planning (Environmental Impact Assessment) (England and Wales)
Regulations 1999 (as amended)**

SCREENING OPINION

**Proposed redevelopment of site for renewable energy generation facility
Request for screening opinion.**

The Proposal

A Screening Opinion has been requested under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended). The screening relates to the proposed development as described above on land off Bryn Lane, Wrexham Industrial Estate, Wrexham. An application is expected.



Plan 1 Location Plan

The site covers an area of just over 1 hectare (2.52 acres) located off Bryn Lane to the west of TDG. The site is located within the limits of Wrexham Industrial Estate although not allocated for

employment purposes. It is part of a larger site which has a council resolution to grant planning permission for B1/B2/B8 and means of access subject to the completion of a s106 agreement. The current proposal subject of this Screening request is for an alternative development described as follows:

The proposed changes are a redevelopment of the site for a proposed renewable energy generation facility. The facility will utilise one of the cleanest and most efficient methods of energy generation, one of the few technologies eligible for the governments renewable obligation certificates at the highest level. To be housed within two industrial B8 type buildings, the facility will have an operating capacity of up to 3 MW and will be fuelled by clean wood-chip which would be delivered by road. The wood-chip is sourced from virgin wood from a plant in Merseyside which is approximately 50 miles north east of the site. The proposed throughput would be no more than 22,500 tonnes per annum, which equates to approx 1 tonne per MW/hour over 7500 hours per annum. The site would receive approximately 3 articulated vehicles per day, which would all arrive and depart towards Bryn Lane north.

The proposed facility will generate both electrical and heat energy. It is proposed to export the generated electricity to the National Grid via a sub station to be located within the proposed facility. The excess heat will be offered to existing operators on the Industrial Estate as well as being recycled within the site. The proposed facility will therefore contribute in meeting both national and regional targets for renewable energy provision and contribute to reducing carbon dioxide emissions.

It is proposed that the facility would be served by a new access off Bryn lane.

Relevant History

P/2008/0992 was considered by the Council's Planning Committee earlier in 2009 with a resolution to grant permission subject to the completion of a s106

Development Plan

The site is located in the open countryside as shown in the Wrexham Unitary Development Plan. UDP policies: PS2, PS9, PS11, GDP1, EC4, EC5 (nearby), EC6, T8 and MW8. Local Planning Guidance Notes 7 – Landscape and Development, 17 – Trees and Development and 26 – Landscaping and Industrial Development also refer.

National policy in respect of minerals is set out in Mineral Planning Policy Wales published (December 2000). Other relevant guidance is contained in TAN 5 - Nature Conservation and Planning (draft 2006), TAN 11 Noise (1997) and TAN 18 Transport (2007).

Screening Consideration

This **request** for a Screening Opinion is submitted to Wrexham County Borough Council under the procedures set out in Part II of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (amended). The proposed development is **not** categorised as any of the activities under Schedule 1 of the Regulations, for which the submission of an EIA is mandatory. As such, it is appropriate to consider the proposed development in the context of paragraph 3(a) (Energy industry - Industrial installations for the production of electricity, steam and hot water) under Schedule 2 of the Regulations. These

thresholds determine whether a development falls within Schedule 2 of the regulations whereby an EIA may be required if the development has the potential to generate significant effects. For this development the applicable threshold and criteria to be taken into account when determining if the proposals fall within Schedule 2 is defined as follows:

- The area of the development exceeds 0.5 ha.

The proposal does fall within Schedule 2 of the 1999 Regulations as a development project with a site area exceeding 0.5 hectares. The issue for consideration – will the project **have significant effects upon the environment**.

The general criteria for assessing **significance** are provided in paragraph 33 of the Circular. In applying the general tests of significance the LPA must assess whether a Schedule 2 project is likely to have impacts that are of 'more than local importance'. It is not sufficient that the development will have off site local impacts. More than local importance means effects beyond their immediate locality, which give rise to substantial national or regional controversy, which may conflict with national policy on important matters. The fact that there are likely to be environmental effects beyond the site boundaries but within the general locality of the site does not therefore, in itself, constitute 'more than local importance'.

Schedule 3 of the Regulations raises certain selection criteria that must be taken into account:

- Characteristics of the development (it is more than local importance?)
- Location of development (is there a sensitive/vulnerable location involved?)
- Characteristics of potential impacts (would these be complicated or adverse?)

Characteristics of the Development

- Size** – The Development will comprise an area of approximately 1 hectare. The proposed development will produce an output of 3 MW – considerably less than the 50 MW threshold for larger energy generating operations and therefore under this threshold alone it is considered that the proposed development does not constitute EIA development. It will not be of a nature or activity that would give rise to potential significant increase in emissions from operations nor a significant increase in terms of traffic generation. A Transport Statement will be submitted with the application.
- Cumulative effect** – there are no other proposals of this nature in the locality. It is located within the limits of Wrexham Industrial Estate where new employment development, in principle, is directed, thereby ensuring that no adverse cumulative impact would occur.
- Use of natural resources** – there is no use or loss of natural resources beyond that associated with standard construction practices. The proposal does not require significant excavation work and any excavated material will be retained on site and used for screening purposes or as part of engineering on the adjacent landfill. Good general practice will be complied with to recycle or reuse materials wherever possible at the construction stage. The proposed development will use wood chip as a source of renewable energy. The material is clean wood from a plant in Merseyside of a sustainable source – therefore no significant effects will occur relating to natural resources.
- Waste** – the proposed development will result in certain by-products consisting of treated liquid condensate (of up to 40 litres per hour, per 250 KW gasifier). This will be flushed into the foul sewer following periodic testing to ensure its suitability (monitored within the remit of the Environmental Permit). Char and ash will be created as a by-product (up to 17kg per hour, per 250 KW gasifier) which is typical of such a facility.
- Pollution and nuisance** – construction operations can be controlled through suitable environmental management plans (EMP). The proposed development is not predicted to give rise to any adverse increased pollution or nuisance. Standard working practices and the need to obtain and operate within the constraints of the planning consents would mean that there is

no realistic potential for new pollution or nuisance to be created at the site. Issues such as noise and air quality can be controlled by condition and should not give rise to any material adverse effects. Noise and air quality reports will be produced and submitted along with the application.. An Environmental Permit is expected to be required for the facility.

- f. **Risk of accidents** – this is a proven form of development, specifically designed to minimise the risk of accidents and will be regulated by health and safety requirements. No untested technologies or unusually hazardous substances will be used during construction. The access to the site and turning areas for HGVs will be carefully considered to ensure its adequacy. The use of all potential pollutants will be appropriately managed in accordance with best practice and Environment Agency guidance. As stated above, a PPC or Environmental Permit is expected to be required for the facility.

Location of the Development

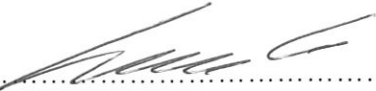
- g. **Land use** – the site is located on land within the Wrexham Industrial Estate where new employment development, in principle, is directed. The site is currently vacant land.
- h. **Local natural resources** – no exceptional or unique natural resources will be lost or significantly affected by the proposed development.
- i. **Absorption capacity** bearing in mind the locality – it is noted that:-
- the proposal is located on a vacant site;
 - the site is not a wetland;
 - it is not on the coast;
 - it does not relate to a mountain, forest, park or nature reserve;
 - it does not sit within any European nature conservation designation;
 - the adjacent area currently has a habitat potential for a variety of species including protected species. Ecological mitigation will be incorporated within the submission to ensure the long term integrity of known protected species are safeguarded.
 - no areas in which the environmental quality standards laid down in Community Legislation have already been exceeded will be affected by the proposals;
 - the immediate area is not densely populated, being within the boundary of an existing industrial estate, nor is there particular landscape or heritage interest that would be adversely affected; and
 - no landscapes of historical, cultural or archaeological significance will be affected by the proposals.

Characteristics of Potential Impacts

- a. **Extent** – direct effects are limited to the local area in terms of traffic, air quality, noise, scale and ecological issues which will be all addressed within any subsequent submitted application;
- b. **Transfrontier impacts** – the proposed works and any impacts are entirely within the administrative area of Wrexham County Borough Council;
- c. **Magnitude and complexity** – there are no particular complexities with the proposed activities at the site;
- d. **Probability** – the likely effects of the development are clearly definable and limited to the development site and its immediate vicinity only. The probability of this impact is certain and of any other unknown effects occurring the probability is minimal/zero;
- e. **Duration, frequency and reversibility** – disturbance to sensitive receptors during the construction phase will be localised and temporary in duration - duration of the construction works will be over a relatively short period. Once operational, any effects of the development are predicted to be negligible in relation to its location. While the proposed development will be part of the Industrial estate in perpetuity, the impact of the completed development is reversible as the facility could be removed and the site restored.

Summary

The proposed development is referred to as Schedule 2 development. Following the above consideration it is not of such a nature or scale that it will breach Schedule 3 thresholds and criteria. Accordingly, it is hereby certified that based upon the above assessment and the information known at this stage, no significant environmental impacts of more than local importance are identified that would justify a decision to require an Environmental Impact Assessment.

Signed: 
Lawrence Isted
Chief Planning Officer

Date: 15 December 2009

APPENDIX 2:
PROPOSED SITE PLAN



red line denotes
the extent of planning application



location plan - proposed 1:1250

antonio garcia architecture		JOB/CLIENT: GREEN PLAN ENERGY LTD WREXHAM INDUSTRIAL ESTATE BIOMASS PLANT		
ARCHITECTURAL DESIGN & VISUALISATION		DRAWING TITLE: LOCATION PLAN - PROPOSED		
TEL: 0151 709 1010 FAX: 0151 709 1111 e: info@antonio-garcia.co.uk www.antonio-garcia.co.uk	38a HOPE STREET LIVERPOOL L19BX	SCALE: 1:1250@A3	DRAWN BY: JL	DRAWING No. 1251
		DATE: 23.11.2009	CHECKED BY: AG	
		COMPUTER DRAWING REF: PROJECT No. L156/06		

DO NOT SCALE THIS DRAWING. VERIFY ALL DIMENSIONS ON SITE. ANY DISCREPANCIES TO BE REPORTED TO ANTONIO GARCIA ARCHITECTURE

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