



St Land Holding Limited

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PLANNING STATEMENT

Planning Application for a fast response electricity generation plant on land at Bridge Road North, Wrexham, nearest Post Code LL13 9PS

Prepared by:

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SUMMARY

The UK has been a lead on the international stage regarding the need to reduce carbon and greenhouse gas emissions. The UK has been actively pursuing ambitious targets to reduce these emissions. The Climate Change Act 2008 introduced binding targets that require the UK to reduce their carbon emissions by 80% below the 1990 levels by 2050. The new UK government has set new targets and pledged to reach Net Zero by 2050. This is a significant undertaking which will require approximately 8GW per year of new clean energy capacity from now until 2050.

A further key policy in meeting these targets is to reduce the reliance upon large centralised fossil fuel electricity generation plants. Hence the UK is withdrawing and decommissioning the coal fired power generation plants that have been a primary source of electricity generation for many decades. These plants are being replaced by renewable energy generation whether by wind, small scale hydro or solar. These new sources of electricity generation are dependent upon weather patterns. These weather patterns control the electricity that can be produced from these renewable energy sources. The generation can be intermittent and significantly variable. The rate of change in generation can be considerable and occur rapidly.

Whilst reducing the proportion of electricity derived from coal-fired generation plants the UK is also withdrawing several of their older nuclear power stations, that have reached the end of their life and require replacement. This has reduced the generation capacity of the UK and the margin between supply and demand capacity to some of the lowest on record. The electricity suppliers are therefore heavily constrained and have little flexibility to manage the variable nature of the generation supply and demand, because, whilst the margin between generation supply and demand is reducing the modern consumer is placing ever-increasing growth on the demand for electricity.

To balance the needs of electricity supply and demand and ensure energy security, whilst encouraging the ever-increasing deployment of renewable energy generation requires a new form of generation that can be embedded within the local distribution system, close to the point of consumption.

Due to the voltage of the network these embedded generators are connected to, they are often small scale and connected to the local 11KV network and due to their technology and scale they provide a fast, efficient response to any request to start generating. They bring the flexibility required to maintain a secure supply of electricity. These projects are often referred to as Short Term Operational Reserve, (STOR) plants.

The modern reciprocating gas engine is robust proven technology capable of meeting the flexible operational demands of; multiple starts and stops, fast response time, rapid ‘ramp-

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up’ to full power and efficient generation. These engines (gensets) are fuel efficient, clean burning and can be designed to be housed within metal containers or small building units, they occupy a very small footprint and require minimal additional infrastructure. The performance and reliability of these gensets makes an ideal choice for providing the flexibility to balance the grid network and maintain power supplies.

This application seeks planning permission to provide a small-scale electricity generating facility of up to <10 MW to support the supply of electricity within the local distribution network during peak electricity demand periods. The gensets will also run during any period when there is a shortfall in forecast generation levels. The facility would also be available to support the National Grid during emergency conditions on the electricity network. The application site is ~0.3Ha of unused industrial land south of Bridge Road North, within Wrexham Industrial Estate. The site is near both the adequate gas supply and connection to the local electricity distribution network operated by Scottish Power Energy Networks.

The gas engines will be housed within a maximum of six containerised units/structures and a container roof mounted exhaust stack, 5.8 metres high will ensure any emissions are adequately dispersed. Radiators and cooling fans will be ground mounted for ease of maintenance. Along with the electrical infrastructure the facility will be enclosed by a 2.4-metre-high, olive green painted security fence.

As there is no demand for the plant to be operated as a base load plant, the gensets will stand idle until a demand requirement. On demand the gensets will initiate their start-up and within approximately two minutes reach peak generation export capacity of <10 MWe. The plant can be turned down and respond to multiple start-up/shut-down cycles.

With experience of running these facilities the gensets would typically run for an average of ~3500 hours a year. Typically, at the periods of high electricity demand, most commonly during the evening hours, rarely at night and weekends. The most common peak demand periods occur between 16.30 and 21.00. However, the plant will be available for generation on receipt of a signal from National Grid at any time of day or night and any day of the week.

When generating the electricity is injected to the local distribution system. This plant will supply the 11,000-volt network that serves Holyhead and the local surrounding communities.

This Planning Statement assesses the application against the policies of Planning Policy Wales and Technical Advice Notes and the Wrexham Local Development Plan. It provides a summary of the specialist assessments undertaken to support this application. The applicant has provided environmental, ecological and technical assessments in support of this application and a separate Design and Access Statement.

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The conclusions of our assessments and studies confirms the site is suitable for a small-scale gas fuelled short-term operational reserve project, because:

- The site benefits from proximity to suitable infrastructure for connection to the 11,000-volt electricity network operated by Scottish Power Energy Networks, SPEN.
- The site benefits through the proximity to the required gas connection which is adjacent to the site.
- The site is safeguarded for employment and industrial uses..
- The applicant has undertaken noise, ecology and air dispersion modelling and found that there are no significant adverse impacts as a result of the development.
- The site benefits from excellent access directly off the public highway.

The applicant concludes that there are no material considerations identified that should be weighed against this application and that with the proposed layout the applicant has developed a design such that it will not result in any unacceptable significant adverse impacts regarding the ecology, environment and human amenity. The applicant also proposes measures to increase the diversity of local wildlife by taking forward the opportunity recommendations identified within the Ecology Report as described within the Construction Environmental Management Plan.

The proposed development and the design adopted for the scheme will not detract from the future opportunities for development of the Wrexham Industrial Estate and the expected employment. By its very nature the development is an industrial use.

The development is for a small operational reserve energy generation project which National Grid and the UK government has identified as an important part of its national energy strategy for the reasons discussed above. The development is designed to provide utility infrastructure to maintain the security of supply of electricity for the local community. They receive the direct benefit of the generators maintaining and providing a secure supply of electricity now, and in the years ahead.

The development will provide and secure long-term employment and be a source of much needed inward investment to the local community, enhancing the sustainability of the local businesses, whilst enabling the deployment of increased renewable energy capacity, benefitting the reduction in green-house gas emissions.

The development also meets the wider policy considerations in respect of; landscape and visual impacts, residential amenity, impacts on the natural environment, ecology, flood risk and highway safety. In addition, the development is acceptable in relation to other material considerations, including the Planning Policy Wales and Technical Advice Notes and the UK government's Overarching National Policy Statement for Energy (EN-1) (applicable to both

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England and Wales). The applicant contends that this application draws strong support from these material considerations which should be afforded significant weight in the determination of this application.

In conclusion this application is acceptable in planning terms and meets the UK Government’s objectives to ensure that the UK continues to support the transition to a low carbon economy whilst ensuring a safe, secure and reliable supply of electricity.

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared for a full planning application to be submitted by St Land Holdings Limited (the “Applicant” or “SLHL”) for containerised gas generation units for electricity generation with a total output of less than 10MW, on land at Bridge Road North, Wrexham Industrial Estate, Wrexham, LL13 9PS (the “Proposed Development Site”).
- 1.2 Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.
- 1.3 The purpose of the Planning Statement is to provide an assessment of the Proposed Development against relevant planning policy and guidance and, if appropriate, set out material consideration which justify a departure. The Statement demonstrates that the application has taken account of the constraints of the Proposed Development Site.
- 1.4 This Planning Statement supports a planning application and considers:
 - A description of the development;
 - The need for the development;
 - The benefits of the proposed development;
 - Review the proposed development in the context of relevant planning policies;
 - Discusses the planning balance, the potential impacts and the assessments undertaken to mitigate their impact if required;
 - The general site layout and plan is shown on drawing SLH-01-002.
- 1.5 This document assesses the planning considerations associated with the application proposal and considers the proposals in the context of the Development Plan as well as National Planning Guidance. It also incorporates a statement to describe the issues of design and access relevant to these proposals.

The application is accompanied by the following plans and drawings:

- Site Location Plan;
- Site Layout Plan [drawing ref. SLH-01-002];
- Gas Kiosk [drawing ref. SLH-01-001];
- DNO Building [drawing ref. SP4149718];
- Oil Tank [drawing ref. SLH-01-009];

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- Cooling Radiator [drawing ref. SLH-01-005]
- Client HV Building [drawing ref. SLH-01-006];
- Gate and Fencing [drawing ref. SLH-01-007];
- Genset [drawing ref. SLH-01-004];
- Transformer [drawing ref. SLH-01-008];
- Amenity Cabin [drawing ref. SLH-01-010]; and,
- CCTV [drawing ref. SLH-01-011].

This Statement should be read in conjunction with the other documents that have been submitted with the planning application including:

- Completed Application Form and Certificates;
- Cover Letter to Wrexham Council;
- Drawings Schedule, listed above
- Design and Access Statement,
- Construction Transport Management Plan,
- Ecological Assessment, prepared by Ensafé;
- Construction, Operational Environmental Management Plan
- Dispersion Modelling Assessment, prepared by Ensafé; and,
- Noise Impact Assessment, prepared by Ensafé.
- Flood Consequences Assessment and Drainage Strategy – prepared by DeltaSimons
- Contaminated Land Report – prepared by Groundsure

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2. BACKGROUND TO THIS PROPOSED DEVELOPMENT

- 2.1 In the North Wales SLHL have worked with the Scottish Power Energy Network and Wales and West Utilities to develop their database identifying potential development sites. The proposed development was one of these sites SLHL identified as having the availability of both a suitable electricity grid connection and connection to the gas supply network.
- 2.2 SLHL provide risk managed power generation in the UK power sector. It is a full-service energy provider, offering services to private, corporate organisations as well as governmental and non-governmental authorities.
- 2.3 SLHL operate in two main sectors: gas ‘peaking’ and energy storage. Gas peaking relates to the provision of small-scale gas-powered electricity generation plants that are distributed at key points around the National Grid [NG] and provide top up generation capacity during times of peak demand. The Company installs reciprocating gas engine plants generally up to a maximum of 10 MW dependent on available grid capacity on the 11kV network.
- 2.4 For the energy storage sector SLHL provides a similar purpose but achieves this by storing electricity generated at times of low demand and re-providing this to the National Grid (NG) during times of peak demand. Energy storage is an emerging sector, but one which has great potential to assist NG to balance the UK’s power network in terms of generation, demand and frequency. The Applicant aims to become one of the biggest participants in the growing energy storage sector by being a prime mover in this market and securing land, storage assets and frequency response service contracts with NG.
- 2.5 The provision of both these systems is essential across the national grid as the country becomes more reliant on sustainable power sources such as wind and solar energy. Generation from these sources does not match demand patterns and thus there can be times when generation is low, but demand is high. Similarly, there are times when there is surplus generating capacity available and energy produced that exceeds demand but cannot be stored.
- 2.6 The UK has adopted policies that have been reducing its reliance on generating electricity from fossil fuel coal fired power stations whilst also withdrawing several the older nuclear electricity generators.
- 2.7 These reductions in centralised generating plants has created a challenge to enable the grid operators to integrate the new renewable energy projects that have been replacing these redundant nuclear and fossil fuel plants.
- 2.8 The intermittency of the renewable generators and the base load characteristics of nuclear generating plants are incompatible unless flexibility can be found to enable the balancing between electricity supply and demand.

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- 2.9 The UK Government’s Clean Growth Plan published 12 October 2017 established within government policy the importance of a diversified electricity generation and distribution system;

“We want a diverse electricity system that supplies our homes and businesses with secure, affordable and clean power. That means developing low carbon sources of electricity that are both cheap and clean, taking into account wider system impacts for all sources of generation. It also means upgrading our electricity system, so it is smarter (using data to provide greater control), more flexible (providing energy when it is needed) and takes advantage of rapidly developing technologies such as energy storage.”

- 2.10 The above policy established the ‘market’ for fast responsive embedded generation and SLHL has responded by establishing an experienced team of developers, operators and engineers to meet the demands of the Clean Growth Strategy.

PROPOSED DEVELOPMENT

Site Location

- 2.11 The Proposed Development Site is located on land to the south of Bridge Road North , Wrexham Industrial Estate, LL13 9PS. The Proposed Development Site is on currently unused vacant land within the existing industrial estate.
- 2.12 The proposed development utilises land to the north fronting Bridge Road North, leaving the land to the south for proposed habitat management to improve the ecology and local environment. To the east and west boundaries of the site there are two un-named water courses.
- 2.13 The nearest settlements are approximately 350 metres to the west on Coed Aben Road.
- 2.14 There are no structures on the site and as such demolition is not required. The site area has recently been cleared in early 2020 of bracken, scrub and young Alder trees.

Proposed Development

- 2.15 In the North Wales SLHL have worked with the Scottish Power Energy Network and Wales and West Utilities to develop their database identifying potential development sites. The proposed development was one of these sites SLHL identified as having the availability of both a suitable electricity grid connection and connection to the gas supply network.
- 2.16 SLHL provide risk managed power generation in the UK power sector. It is a full-service energy provider, offering services to private, corporate organisations as well as governmental and non-governmental authorities.

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- 2.17 SLHL operate in two main sectors: gas ‘peaking’ and energy storage. Gas peaking relates to the provision of small-scale gas-powered electricity generation plants that are distributed at key points around the National Grid [NG] and provide top up generation capacity during times of peak demand. The Company installs reciprocating gas engine plants generally up to a maximum of 10 MW dependent on available grid capacity on the 11kV network.
- 2.18 For the energy storage sector SLHL provides a similar purpose but achieves this by storing electricity generated at times of low demand and re-providing this to the National Grid (NG) during times of peak demand. Energy storage is an emerging sector, but one which has great potential to assist NG to balance the UK’s power network in terms of generation, demand and frequency. The Applicant aims to become one of the biggest participants in the growing energy storage sector by being a prime mover in this market and securing land, storage assets and frequency response service contracts with NG.
- 2.19 The provision of both these systems is essential across the national grid as the country becomes more reliant on sustainable power sources such as wind and solar energy. Generation from these sources does not match demand patterns and thus there can be times when generation is low, but demand is high. Similarly, there are times when there is surplus generating capacity available and energy produced that exceeds demand but cannot be stored.
- 2.20 The UK has adopted policies that have been reducing its reliance on generating electricity from fossil fuel coal fired power stations whilst also withdrawing several the older nuclear electricity generators.
- 2.21 These reductions in centralised generating plants has created a challenge to enable the grid operators to integrate the new renewable energy projects that have been replacing these redundant nuclear and fossil fuel plants.
- 2.22 The intermittency of the renewable generators and the base load characteristics of nuclear generating plants are incompatible unless flexibility can be found to enable the balancing between electricity supply and demand.
- 2.23 The UK Government’s Clean Growth Plan published 12 October 2017 established within government policy the importance of a diversified electricity generation and distribution system;
“We want a diverse electricity system that supplies our homes and businesses with secure, affordable and clean power. That means developing low carbon sources of electricity that are both cheap and clean, taking into account wider system impacts for all sources of generation. It also means upgrading our electricity system, so it is smarter (using data to provide greater control), more flexible (providing energy when it is needed) and takes advantage of rapidly developing technologies such as energy

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storage.”

- 2.24 The above policy established the ‘market’ for fast responsive embedded generation and SLHL has responded by establishing an experienced team of developers, operators and engineers to meet the demands of the Clean Growth Strategy
- 2.25 The submission is a full planning application for consent to construct and operate a small electricity gas generating station; including the installation of gas generator engines and ancillary plant. The facility will provide rapid backup energy generation and will be able to generate up to 10 MW of electricity.
- 2.26 The technical and environmental reports have been prepared to accompany this application. Each assessment has considered the key parameters relevant to the operation of the plant. The assessments have taken a precautionary approach regarding the environmental effects that may occur and made recommendations that can enhance the increase the diversity of the local ecology and mitigate impacts of development.
- 2.27 The Planning Statement provides an assessment of the proposed development regarding development planning policy and considers other material considerations.
- 2.28 The applicant has also provided a Design and Access Statement which should be reviewed in conjunction with the Planning Statement.
- 2.29 The Planning Statement also considers UK and Wales Government’s policy towards the importance of lowering carbon emissions, reducing use of fossil fuels in generation of energy, securing reliable energy supplies and the benefits that will arise from the construction and operation of the development.

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3 SITE DESCRIPTION

- 3.1 The site is located within the administrative boundary of Wrexham Council and situated on land at Wrexham Industrial Estate. The National Grid Reference of the site is approximately (NGR) 338100, 349550.
- 3.2 The application site is shown by the red-line boundary drawing and Site location Plan reference SLHL-01-002. The proposed development area can be described as a polygon irregular shape piece of land of approximately 0.23 Ha, with Bridge Road North, to the north.
- 3.3 There is no apparent planning history associated with the proposed site.
- 3.4 The development works will be located in the northern part of the site.
- 3.5 The land to the south, east and west will be managed in accordance with the Construction, Operational Environmental Management Plan (COEMP) and the Preliminary Ecological Assessment Report to improve the quality of the habitat for local wildlife and used as a compensatory measure to support this wildlife.
- 3.6 The extended Preliminary Ecological Assessment Report was undertaken on July 2020. The recommendations of the habitat survey resulted in the creation of ecological mitigation areas as described within the COEMP. These areas are to the east, west and south of the fence line of the proposed plant.
- 3.7 The ecological mitigation area will comprise the retained habitats of value, enhanced by habitat management and new planting as determined by the Ecological Appraisal submitted in support of this application.
- 3.8 The proposed red line planning boundary area is shown on drawing SLHL-01-002. However the total landownership and land available for the habitat improvement and enhancement is ~0.7 Ha. The final area of the plant facility within the fence line is an area of ~0.23Ha. Hence through this development of a vacant unused land plot, the application brings an important economic activity to the area, providing employment and provides benefits through the proposed habitat improvement.
- 3.9 Approximately 0.47Ha of habitat will be retained and improved within and adjoining the application site. Hibernacula will be constructed within this mitigation area; within the existing retained vegetation at a size of 2m wide by 1m tall as recommended by guidance and the Preliminary Ecological Assessment and the COEMP.
- 3.10 The proposed development is for a gas-powered standby generation plant, commonly referred

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to as Short-Term Operating Reserve (STOR).

- 3.11 The proposed development will generate up to approximately <10 MWe, the generation voltage ‘stepped-up’ by the transformers to 11,000 V for connection to the distribution network operated by Scottish Power Energy Networks. The gensets will also be connected to the national gas main system.
- 3.12 The connection point for the electricity is the adjacent substation owned by Scottish Power Energy Networks, and the gas connection point is in close proximity to the site.
- 3.13 The application site is not within a conservation area and does not affect any surrounding conservation designated area.
- 3.14 The proposed development is within an area safeguarded for future development of employment opportunities and is surrounded by existing buildings associated with the Wrexham Industrial Estate, hence within an industrial setting.
- 3.15 There are no rights of public access through the proposed the site and only authorised access will be permitted.
- 3.16 The proposals are seen to incorporate the retention of landscape features, primarily to the northern boundary with Bridge Road North and retain and establish areas for habitat and ecology enhancements, whilst establishing an invertebrate mitigation area in the south of the area.

PLANNING HISTORY

- 3.17 No previous planning history is associated with this site.

ACCESS

- 3.18 The site benefits from excellent access from the public highway capable of taking HGV vehicles. The entrance to the site will be via a CCTV monitored security gate. The site will be surrounded with a 2.4-metre-high palisade security fence, as shown on drawing SLHL-01-007.
- 3.19 There are no Public Rights of Way that will be affected by this development.
- 3.20 On street/on road parking will be restricted during the construction works
- 3.21 All equipment deliveries are suitable for delivery using standard HGV transport.

CULTURAL HERITAGE.

- 3.22 The site is previously undeveloped land to the south of Bridge Road North. There are no records of any former use of the site.

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3.23 The potential for any significant adverse impact with regard to archaeology and the cultural heritage is negligible.

SENSITIVE RESIDENTIAL RECEPTORS NEAR THE PROPOSED SITE

3.24 The nearest sensitive receptors are some 350 metres west of the site on Coed Aben Road. The specialist reports submitted as part of this application indicate that these receptors will not be significantly adversely affected by this development.

3.25 The site is not located within any designated area. But in accordance with the recommendation of the ecologies the applicant has adopted precautionary measures of mitigation to provide compensation for any losses of habitat and enhancement measures.

3.26 The development is not considered to affect the openness or character of the area, or adversely affect the any of the surrounding areas when viewed from within or when viewing towards the development.

3.27 Users of the Bridge Road North will be unlikely to notice during peak travel times any short-term increase in traffic during the construction period. The construction traffic is typically at its peak for a short period of 8 weeks and deliveries to the site can be coordinated by the applicant to ensure that they are delivered to site outside of peak traffic periods of 08.00 to 09.00am and 17.00 to 18.00pm.

3.28 During the operational phase it is probable that visits to the site will not exceed, on average one visit per week.

3.29 A review of other statutory and non-statutory designated sites within the locality has been undertaken. This demonstrates that there are no designated or non-statutory sites regarding nature conservation, landscape and other designations adjoining the site of the proposed development that would suffer any significant adverse impact from the development.

ECOLOGY

3.30 The applicant has completed an ‘Preliminary Ecological Appraisal’ for the proposed site. The appraisal makes recommendations that will enhance and diversity of the local wildlife and recommends some precautionary measures. The applicant has also prepared their Construction Operational Environmental Management Plan (COEMP). With these recommendations implemented the development will have no significant adverse impact upon wildlife.

3.31 The applicant will implement the recommendations of the Ecology Report and the CEMP.

3.32 The enhancements proposed will be provided to encourage the increase in biodiversity

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diversity. These measures will include additional bat and bird boxes, insect boxes and hibernacula and improvement through the provision of areas managed for the potential presence of Great Crested Newts. With implementation of the recommendations made the development will have a negligible adverse impact upon the ecology within the site. The extent of the enhanced habitat will be approximately 0.5 Ha.

- 3.33 The applicant will engage the services of an ECoW prior to the works commencing as highlighted in the Preliminary Ecological Report and the COEMP.

NOISE AND AIR QUALITY

- 3.34 The applicant has completed a Noise Impact Assessment finding that the rating level falls comfortably below the background noise levels at the closest receptors to the site.
- 3.35 The applicant has also undertaken an Air Dispersion Modelling Assessment. The assessment was used to quantify the pollutant concentrations, throughout the surrounding area to assess the potential for nearby sensitive receptors to be exposed to poor air quality. The assessment concluded that the impact of pollutant concentrations was predicted to be insignificant at all sensitive locations within the assessment area. The findings indicate that the stack height for the dispersion modelling is 5.8m.

VISUAL IMPACTS

- 3.36 The location of the proposed facility, the existing landform and topography provide appropriate screening to the closest receptors. The applicant has maintained a design for the layout which minimises the required footprint contributing to a layout that aids mitigation of any adverse visual impact.
- 3.37 The applicant proposes to retain much of the existing hedge and trees to the boundary of the site to reduce any adverse visual impact which will also provide a wildlife corridor as recommended within the Preliminary Ecological Report.

FLOOD RISK

- 3.38 The applicant has prepared the Flood Consequences Assessment and Drainage Strategy and both are submitted in support of this application. The recommendations of both reports will be implemented by the applicant.
- 3.39 Much of the site is considered Zone A but the site is bounded by areas of Flood Zone C2 and B and the applicant has therefore prepared their Flood Consequences Assessment (FCA) and Drainage Strategy.

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3.40 The site is not connected to any foul drainage system.

PLANNING ALLOCATIONS AND DESIGNATIONS

3.41 This application is being submitted to Wrexham Council. This Planning Statement considers the benefits of this development against the Wrexham Local Development Plan.

3.42 A full assessment of the proposal against relevant National and Local Planning Policy is provided within Chapter 5 of this Planning Statement. This confirms that the proposal is consistent with relevant planning policy.

SITE SUITABILITY & SELECTION

3.43 The Proposed Development follows an extensive site selection process undertaken by the Applicant. This review of potential sites is based upon the following criteria:

- Availability of grid connection
- Availability of appropriate gas supply
- Availability of land
- Accessibility of land
- Proximity to residential uses
- Other physical site constraints

3.44 The Proposed Development constitutes ‘embedded energy’ which means the proposed facility will feed its power into the Local Distribution Network Operator (DNO) network close to the point of use, rather than into the National Grid. This has the distinct benefit of greatly improving the carbon efficiency of the facility by avoiding transmission losses which may otherwise occur over long distances associated with the current centralised network.

3.45 The applicant has therefore assessed local gas and electricity distribution networks to identify sites close to DNO primary substations and gas supply where the network has capacity to accept embedded supply. In order to be viable, the proposed supply facility needs to be close to a substation which has capacity to export the power. The “acceptable cost” of electricity production is not set by the Applicant, but rather the reverse auction of the Capacity Market exists to ensure the government is procuring energy at the most competitive costs possible. In order for the government to keep energy costs per household at a manageable level, flexible generation facilities such as that being proposed need to be able to connect at an acceptable cost.

3.46 The first stage of the site selection process therefore, was to identify those areas which have a commercially viable and available grid connection.

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- 3.47 Once this area was identified, the applicant carried out a review of land to identify an available and suitable site for the proposed generation facility. In line with national planning policy, brownfield sites were reviewed in the first instance. Given the industrial nature of the Proposed Development, existing industrial estate setting and the unused nature of the industrial land this site was considered the most suitable locations. Sites also need to be an acceptable distance from nearby residential and commercial properties in order to preserve amenity.
- 3.48 Potential sites were also reviewed with regard to their physical constraints such as flood risk, topography, ecological constraints and landscape and visual impact considerations.
- 3.49 For the above reasons the Proposed Development through the identification of a site located between existing industrial buildings has sought to minimise impacts on biodiversity, geodiversity, landscape character and areas of recreational or agricultural value by selecting a site which meets the technical viability requirements of this type of development.
- 3.50 The impacts on ecology, air pollution, noise pollution, visual intrusion and land contamination have all been considered and no significant adverse impact has results from the development.
- 3.51 The site is bounded by land within the Flood Zone C2 and B and hence the applicant has undertaken a FCA and Drainage Strategy. These reports show that the development will not have any detrimental impact upon flooding and not cause any additional flood risk.
- 3.52 The specific site has been identified as suitable for the proposed development for several reasons:
- a. Reference to the site and the Local Plan identifying the designation for employment uses.
 - b. The development adjoins the local infrastructure of the distribution electricity network making its selection ideal
 - c. The development does not restrict the use of the land within the adjoining industrial estate
 - d. The development benefits from excellent transport links
 - e. The development will support the surrounding business community and areas by improving the energy security and supply
 - f. The development has no significant adverse impact on any sensitive residential or adjoining occupiers' receptors or the natural environment
 - g. The development utilises previously unused vacant land bringing this forward for an economic use.

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- h. The development will create/maintain employment and support the local economy through supply-chain employment and maintaining secure electricity supply making and underpinning the sustainability of local businesses.

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4 THE NATIONAL NEED

- 4.1 At a national level, National Grid manage the supply and demand of electricity to maintain the next work frequency and voltage tolerances. The frequency the grid operates is 50Hz, but if it drops below 49.5Hz or rises above 50.5Hz due to real-time demand, it could lead to a blackout event and outages.
- 4.2 Under the terms of the Distribution Network Operator License requires the local distribution networks to maintain the 11000-volt distribution system within +6% and -9% of 11000 volts and the proposed development aids the management of the system to stay within these requirements.
- 4.3 As electricity cannot be stored in useful quantities, National Grid requires balancing services to counter unexpected frequency change. Where it is economical to do so, National Grid will procure part of this requirement ahead of time.
- 4.4 Standby facilities with their capability for rapid response, are now being procured to enable National Grid to manage periods of rapid or unexpected variation with supply or demand:
- a) when energy demand outstrips supply, and
 - b) to balance the real-time changes in supply and demand.
- 4.5 At this grid-scale, standby power facilities are perfect solution required by National Grid for providing the electricity network with power and energy at short notice to help match supply with demand. Without these facilities there is a significantly greater likelihood of black out events and power cuts.
- 4.6 National Grid has estimated that for every 8kW of wind power that is added to the grid, 1 kW of demand response/back-up energy, generated by facilities such as the proposed application is required.
- 4.7 Traditional centralised power stations are not suitable or designed to meet short term demand and fail to deliver the flexibility that is provided by the reserve power facilities proposed by the applicant.
- 4.8 The development will also be used to regulate voltage to ensure that the 11000-volt distribution system is maintained within its licensed parameters.
- 4.9 The National Infrastructure Commission in February 2016 prepared their report to encourage the investment in ‘smart power’ stating;
- “There is significant evidence that operational flexibility will be a key driver for the efficient integration of low-carbon technologies. Flexibility can be provided by*

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different sources. One such source is flexible generation; plants that have low minimum stable generation levels, high ramping rates and increased capability for ancillary service provision.”

4.10 The Governments Clean Growth Plan published 12 October 2017 embeds in government policy the importance of a diversified electricity system;

“We want a diverse electricity system that supplies our homes and businesses with secure, affordable and clean power. That means developing low carbon sources of electricity that are both cheap and clean, taking into account wider system impacts for all sources of generation. It also means upgrading our electricity system, so it is smarter (using data to provide greater control), more flexible (providing energy when it is needed) and takes advantage of rapidly developing technologies such as energy storage.”

4.11 The former Department of Energy and Climate Change (DECC) Policy Paper titled “2010 to 2015 government policy: UK energy security” sets out the Government’s strategy for Electricity Market Reform.
(<https://www.gov.uk/government/policies/maintaining-uk-energy-security-2/>).

It states that the reformed energy market will deliver:

- i. low carbon energy;
- ii. reliable energy supplies; and
- iii. reduced and minimise costs to consumers

4.12 The need is therefore well established both to provide security of supply and to help maintain the progress being made by the UK in meeting its 2050 carbon emissions reduction targets and changing to the low-carbon economy.

PLANNING FRAMEWORK

4.13 The application will be determined by Wrexham Council (the local planning authority) as it falls below the threshold for energy generation projects established within the Planning Act 2008 which states:

“The construction or extension of a generating station is within section 14(1) (a) only if the generating station is or (when constructed or extended) is expected to be within subsection (2) or (3).

A generating station is within subsection (2) if —

- *It is in England or Wales,*
- *It is not an offshore generating station, and;*

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- *Its capacity is more than 50 megawatts.”*

4.14 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

4.15 The relevant planning policy framework consists of:

- National Planning Statements
- National Planning Wales, Planning Policy Wales and the Technical Advise Notes
- The Wrexham Unitary Development Plan and any Supplementary Planning Guidance

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5 PLANNING POLICY

5.1 The National Policy Statements (NPSs) provide the primary policy framework for determination of applications for energy generation infrastructure in excess of 50MW and apply in both England and Wales. Whilst the proposal under consideration here is for energy generation less than 50 MW and will be determined under the provisions of the Town and Country Planning Acts (TCPA), it is noted that paragraph 1.2.1 of the overarching NPS EN-1 states the NPS is likely to be a material consideration in decision making on applications under the Town & Country Planning Act 1990. Hence this is a relevant and material matter regarding this application and the Overarching Statement within EN-1 should be applied.

5.2 The Overarching Statement (EN-1) defines the considerations on matters relating to all energy related proposals. It covers matters to be considered in the determination of the applications referring e.g.; air quality; biodiversity; the historic environment; landscape and visual; land use; noise; socio-economic impacts; traffic and transport; and water quality and resources, and also:

- the need for nationally significant energy projects;
- the Government’s commitment to reducing greenhouse gas emissions,
- the road map to secure low carbon future, and
- delivering the Government’s ambitious action on climate change; and
- identifying the assessment considerations when determining and making decisions on applications for planning consent.

5.3 EN-1 identifies the critical need for secure and reliable supplies of electricity as the transition to a low carbon economy is delivered, and to manage the risks and to secure energy supplies we need sufficient electricity capacity to meet demand at all times.

5.4 Section 3 of EN-1 describes how energy underpins our way of life, in some aspects, in an ever-increasing way. It states that the UK needs all forms of energy infrastructure covered by the NPS to achieve energy security at the same time as reducing greenhouse gas emissions. Section 3.1.4 adds that the substantial weight should be given to the contribution energy projects would make towards satisfying this need when considering applications for development consent under the Planning Act 2008.

5.5 Paragraph 3.2.3 and Paragraph 3.3.15 advise that the Government considers the need for energy infrastructure to be urgent. It is noted in Paragraph 3.6.1 that as the UK moves to a low carbon economy some of the new generating capacity needed is likely to come from new fossil fuel generating capacity to maintain security of supply, and to provide flexible back-up for intermittent renewable energy from wind.

5.6 In assessing planning applications, the NPS(s) stress, that as a result of the need of these

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applications, the decision maker should start from a presumption in favour of granting consent to applications (Paragraph 4.1.2, EN-1). Paragraph 4.1.3 continues, stating that in considering any proposed development and in particular when applying the planning balance of the adverse impacts against the benefits, decision takers should take into account:

- *‘its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and*
- *its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.’*

5.7 Section 5 of NPS EN-1 considers the cross technology impacts that can be applied; listing air quality and emissions, biodiversity and geological conservation, civil and military aviation and defence interests, coastal change, flood risk, historic environment, landscape and visual effects, land use (including open space and green belt), noise and vibration, socio-economics, traffic and transport, waste management, and water quality and resources. Importantly Paragraph 5.9.16 states that the decision maker should consider whether any adverse impact is temporary and reversed in a reasonable timescale.

5.8 A Written Ministerial Statement regarding ‘Security of Supply and the Capacity Market’ was issued by the Secretary of State on 1 March 2016. The statement set out the Government’s reforms to ensure that there would be a secure energy supply in coming years.

5.9 The then Secretary of State described a legacy of underinvestment in the power sector, combined with an increased rate of power station closures particularly ageing coal plant. In addition, the marked increase in intermittent renewable capacity has resulted in lower demand for coal stations. These stations could no longer compete due to higher commodity prices, combined with this lower demand and have subsequently closed.

5.10 The Secretary of State stated;

‘to address this we need to start building new capacity now, especially gas, to guarantee our energy security in the 2020’s.’

As a result, a review of the Capacity Market was carried out. The review concluded that

“the volume of capacity procured needs to rise and the clearing price needs to increase as a result in order to provide the appropriate incentives for the market to bring forward new gas capacity.”

The conclusions to the Review brought forward the Capacity Market auctions by one year and increased the target capacity volume by an additional 1GW (1000MW), whilst considering further increases to account for more extreme cold winter scenarios. These actions serve to show the importance of the application at Bridge Road North

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5.11 In conclusion there is no doubt and clear evidence this application should receive the support of the Planning Authority

Planning Policy Wales (Edition 10 – December 2018)

5.12 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government (Edition 10, December 2018). It constitutes a material consideration for planning applications and its central aim is to promote and provide a framework for sustainable development within Wales. 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, through plan-making and decision-taking

5.13 PPW (Edition 10) has introduced policies to consider the Well-Being and Future Generations Act. The wellbeing of our future generations can be served in no greater way than providing and developing projects that endeavour to meet and provide a solution of reducing our carbon emissions and tackle the issues of climate change. It is clear from all analysis that this application should meet with approval as a result of:

5.13..1 It is instrumental in the UK reducing its carbon emissions

5.13..2 It is instrumental in enabling the Wales Government to meet their carbon reduction targets

5.13..3 It provides locally embedded energy security

5.13..4 It will generate local direct employment and secure local employment through the supply chain necessary to support the operation of the facility

5.13..5 It provides inward investment to the local area and secures development within a safeguarded employment area that can lead to further development within the proposed development area.

5.14 The Well-Being of Future Generations is supported through the development of low carbon generation and by reducing the reliance upon fossil fuel generation as a primary fuel for generation of electricity. The well-being can only be secured by continuing to invest in projects that tackle the issues of man-made climate change.

5.15 PPW recognises that adequate and efficient infrastructure, including services such as electricity are crucial for the economic, social and environmental sustainability of all parts of Wales.

5.16 PPW lends strong support to initiatives that support low carbon and decentralised energy networks. PPW directs local authorities to recognise the responsibility of all communities to contribute to energy generation from renewable or low carbon sources.

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5.17 PPW further states that local authorities should facilitate the delivery of new and more sustainable forms of energy provision at all scales, further outlining the potential for development of renewable and low carbon energy development within the urban/industrial sites.

5.18 The Welsh Government is committed to:

5.18..1 Optimisation of renewable energy generation

5.18..2 Optimisation of low carbon generation; and

5.18..3 To recognise the benefits of renewable energy as part of the overall commitment to reduce the impact of greenhouse gases and ability to increase energy security.

5.19 The Welsh Government is also committed to secure an appropriate mix of energy provision within wales, which;

5.19..1 Maximises the benefits to the economy and community; whilst

5.19..2 Minimising the potential environmental and social impacts

5.20 Developers should select sites and seek to avoid where possible adverse impacts through their careful consideration of scale, location, design and other measures.

5.21 The Planning Act (2008) sets out the threshold for Nationally Significant Infrastructure Projects (NSIP), including energy generation. The proposed development for this site does not qualify as an NSIP because it is not offshore wind and it is below 50MW. Hence this application is one that will be determined by the local planning authority.

5.22 The key statements of the PPW which are relevant to the proposed development site include the following:

- Local planning authorities should take a strategic approach to flood risk and consider the catchment as a whole. PPW requires them to ensure that new development is not exposed unnecessarily to flooding, additional guidance is found in TAN 15: Development and Flood Risk
- The planning system should guide development to lessen the risk from natural or human-made hazards, including risk from land instability and land contamination.
- PPW states that it is for the developer to ensure that the land is suitable for the development proposed, as a planning authority does not have a duty of care to landowners.

5.23 Where there is a risk of significant contamination issues, the local planning authority will require evidence that a detailed investigation and risk assessment has been undertaken and provided within the application.

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5.24 PPW advises that where acceptable remedial measures can overcome such contamination, planning permission may be granted subject to conditions specifying the necessary measures.

5.25 The Technical Advise Notes (TANs) provided further guidance to the policies of the PPW. Together they set out the Welsh Government’s national policies and principles to achieve good planning and sustainable development.

5.26 Additional TANs of relevance to this application include:

TAN 5 (Nature Conservation and Planning)

TAN 8 (Planning for Renewable Energy)

TAN 11 (Noise)

TAN 12 (Design)

TAN 18 (Transport)

TAN 23 (Economic Development)

Additional planning considerations for National Need.

5.27 There is a national need to attain and maintain future energy security and given the past years of underinvestment and the policies announcing the transition to a low carbon economy in June 2014 the then government updated its policy on Maintaining UK Energy Security. The Electricity Market Reform Act (EMR) first published as a White paper in July 2011 is designed to deliver on the policies of low carbon energy and reliable supplies that the UK requires whilst minimising the costs to consumers.

5.28 EMR is designed to deliver on the needs of the UK in terms of reliable supply whilst minimising consumer costs. The UK electricity sector will be transformed to one in which low carbon sources of electricity can compete with conventional, fossil fuel generation – thereby ensuring that we deliver on the policy of acquiring a cleaner, more sustainable energy mix.

5.29 EMR is designed to:

5.29..1 Decarbonise electricity generation

5.29..2 Keep the lights on, ensuring security of supplies, and

5.29..3 Minimise the costs to the end consumer.

5.30 EMR sets out two mechanisms to provide incentives for the investment required to deliver on the required infrastructure:

5.30..1 Contracts for Difference (CFD) which provides long-term price stabilisation for low carbon

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generation plants, allowing investment to come forward with a lower cost of capital

5.30..2 The Capacity Market (CM) which provides a retainer payment to reliable forms of generation for both supply and demand, in return for the capacity being available when required by the system

5.31 CM is designed to enhance the security of supply by ensuring that there is sufficient reliable capacity in place to meet the system demand at any one time. It enables all capacity providers a steady predictable revenue stream against which their investments can be based

5.32 In return for these capacity payments the facilities must deliver energy when needed or face penalties. The costs to consumers is minimised as a result of the competitive auction award process.

5.33 The proposed development at Bridge Road North will fulfil this capacity demand by contributing to the needs of the local and national network.

5.34 With this supportive national policy, the role of flexible generation facilities is identified as a necessary development to meet the required security of energy supplies.

5.35 The role of the flexible generation plants in meeting the UK's energy requirements was recognised by a recent Inspectors decision in the appeal for Hilcote in Bolsover District Council (ref APP/R1010/W/17/3172633), the Inspector found:

“...forms part of the renewable energy infrastructure being developed as part of the UK's obligations under the EU Renewable Energy Directive, because the renewable energy sources are supplies that are dependent on the time of day and weather conditions.”

5.36 Further the Inspector stated:

“...{the proposal) is required to provide greater capacity and flexibility in the energy generation network ... the proposed generators could be described as ‘associated infrastructure’ that would support the move towards low carbon energy supplied increasingly by renewable energy developments”

5.37 Additionally Energy Wales: A Low Carbon Transition (March 2014) stated that gas will be a key transitional fuel because the greenhouse gas emissions from gas are significantly less than coal – subject to the method of extraction. Gas is flexible, responsive and a reliable source of energy which can play an key role in the transition to a low carbon energy system.

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Wrexham Unitary Development Plan

5.38 The Wrexham Unitary Development Plan (UDP) was originally adopted for the period 1996 to 2011 and has now time expired. The replacement Wrexham Local Development Plan (LDP2) is yet to be formally adopted by the Council and therefore the UDP remains the development plan to determine this application. Proposed Development has been considered against policies contained within the Wrexham Unitary Development Plan

5.39 At the local level. There are no specific policies relating to flexible power generation, though Policy PS12 (Renewable Energy) states that there will be a presumption in favour of renewable energy schemes provided that the wider environmental benefits are not out-weighted by detrimental impacts on landscape, public safety and the local environment. The proposed energy facility is not technically renewable energy, though its ability to meet energy shortfalls and instantly support renewable sources ensures its function as a sustainable initiative to align with Policy PS12.

5.40 Therefore in summary the material consideration for this application will include the PPW and TANs which set out the national policies and differing matters of planning along with the overarching UK National Policies and the Policies of the UDP.

5.41 Policies within the Unitary Plan which are relevant to this application are:

- PS1 Strategic Policy relating to the location of development
- PS2 Strategic policy relating to environmental quality
- PS12 Renewable Energy
- GDP1 General Development Principles
- EC4 Trees, woodland and hedgerows
- EC12 Development and Flood Risk
- T8 Parking

Additional policies that are relevant are Supplementary Planning Guidance:

- LPG16 Parking standards
- LPG 29 Employment Development and Nature Conservation.

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6 MATERIAL CONSIDERATIONS

- 6.1** PPW established the land use planning policies for the Welsh Government. It constitutes a material consideration for planning applications with a central theme throughout the document for sustainable development within Wales. The planning system will provide a presumption in favour to ensure sustainable development within Wales. The presumption in favour and the support of sustainable development ensures that social, economic and environmental issues are balanced and integrated through both plan-making and decision- taking.
- 6.2** The guidance within PPW supplements that within the TANs. Together they set out the Welsh Government’s national policies and principles for different planning matters and sustainable development.
- 6.3** PPW para 12.1.1 recognises that adequate and efficient infrastructure, including services such as electricity, are ‘crucial for the economic, social, and environmental sustainability of all parts of Wales.’
- 6.4** PPW lends general support for initiatives to support low carbon and decentralised energy networks. In determining planning applications, the PPW directs local authorities to recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. It also states that local authorities should facilitate the delivery of new and more sustainable forms of energy provision at all scales [§4.5.7]. Furthermore, the PPW [§12.9.7] outlines the potential for the development of renewable and low carbon energy development within urban/industrial brownfield sites.
- 6.5** PPW [§12.8.2] states that planning policy at all levels should ‘facilitate delivery of both the ambition set out in Energy Wales: A Low Carbon Transition and UK and European targets on renewable energy’. The Welsh Government is committed to using the planning system to:
- Optimise renewable energy generation;
 - Optimise low carbon energy generation; and
 - Recognise that the benefits of renewable energy are part of the overall commitment to tackle climate change by reducing greenhouse gas emissions as well as increasing energy security [§12.8.8].
- 6.6** PPW [§12.8.6] further details the Welsh Government’s aim to secure an appropriate mix of energy provision for Wales, which maximises benefits to our economy and communities, whilst minimising potential environmental and social impacts. Developers will need to be sensitive to local circumstances, including siting in relation to local landform, proximity to dwellings and other

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planning considerations [§12.8.14]. Developments should also ‘seek to avoid, or where possible, minimise adverse impacts through careful consideration of location, scale, design and other measures’ [§12.10.3].

6.7 Other key statements of the PPW which are relevant to the proposed development site include the following:

- planning authorities should take a strategic approach to flood risk and consider the catchment as a whole. They should ensure that new development is not exposed unnecessarily to flooding [§13.2.4] (additional guidance is provided here by TAN 15: Development and Flood Risk
- planning system should guide development to lessen the risk from natural or human-made hazards, including risk from land instability and land contamination. It is for the developer to ensure that the land is suitable for the development proposed, as a planning authority does not have a duty of care to landowners [§13.5.1].
- Where significant contamination issues arise, the local planning authority will require evidence of a detailed investigation and risk assessment prior to the determination of the application to enable beneficial use of land. Where acceptable remedial measures can overcome such contamination, planning permission may be granted subject to conditions specifying the necessary measures. If contamination cannot be overcome satisfactorily, the authority may refuse planning permission [§13.7.2].

Further PPW is seen to be supportive of these developments, and confirms that planning should, inter alia:

- Proactively support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that Wales needs;
- Facilitate the delivery of new and more sustainable forms of energy provision at all scales;
- Aim to secure an appropriate mix of energy provision for Wales, which maximises benefits to our economy and communities, whilst minimising potential environmental and social impacts;
- Support the transition to a low carbon future in a changing climate and encourage the reuse of existing resources;
- Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems; and,

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- Encourage the effective use of land by reusing land that has been previously developed, particularly within urban/industrial sites.

Wrexham Unitary Development Plan

6.8 Policy GDP1 provides policy on the general requirements of development. Considerations relevant to this application are:

- Ensure that the 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.

The proposed development will complement the industrial character and nature of the surrounding area, and subsequently accords with TAN 12 relating to design. Retention of important landscape features as part of the ecological mitigation area are shown on the Site Plan. The Design and Access section (5.0) further outlines the appropriateness of the design to the surrounding area.

- Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution... and associated noise, odour or vibration arising from development.

The Noise Impact Assessment (outlined in detail below) identifies that the proposed development will not have an adverse impact on the amenity of nearby sensitive receptors. The Dispersion Modelling Assessment identifies that impacts upon sensitive receptors in respect of air quality were deemed not significant.

- 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.

As identified in the ecology assessment, the proposed development will result in the loss of widespread and common habitat and will have minimal impact on protected species. Mitigation is provided onsite to off-set habitat losses as a result of the proposed development. Where possible existing habitats within the application site have been retained

6.9 Wrexham Industrial Estate is subject to its own Local Planning Guidance Note; LPG 29. This note advises developers on the key ecological issues that need to be addressed on the industrial estate. It emphasizes the following:

- The need for an ecological assessment.

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- An ecological assessment has been submitted as part of this planning application.
- The protection of habitats that are found in preference to mitigation or off-site compensation.
- The ecological assessment identified that the habits found on site were not high value. Areas with a higher potential value are retained and proposals prepared to enhance these habitats, where possible, as part of the development proposals. Additional on-site mitigation has been proposed to off-set the loss of habitats to be removed and corridors established to enable migration of species to other areas of ecological value surrounding the proposed development.
- Measures of protection will be provided surrounding the site to avoid migration of species to areas of the proposed development.

6.10 The proposed development accords with Policy GDP1 and LPG29.

6.11 The proposals fall within the objectives regarding economic development set out in the PPW [§7.1, §7.2 and §7.4] and TAN 23. The PPW outlines the Welsh Government’s commitment to securing economic growth in order to create jobs and prosperity, and to meet the challenges of global competition and of a low carbon future. The proposed facility assists in meeting these challenges by ensuring a security of energy supply whilst supporting the transition towards a low carbon economy.

6.12 The plant would also play a critical role in supporting wider economic growth by providing a flexible form of electricity generation which will supply existing businesses and infrastructure in the area at times when there are changes in the demand for energy. It is therefore compliant with PPW [§7.1, §7.2 and §7.4] and TAN 23, which is clear that local planning authorities should plan to meet the development needs of business and support an economy fit for the 21st century.

6.13 Whilst it cannot be guaranteed that the energy generated at the facility will be of direct benefit to the surrounding employment area, the plant will become operational during times where energy demand exceeds supply and will support the local electricity network. If such flexible power facilities were not available, energy shortages and electricity cuts are more likely to be experienced, which would affect business operations in the immediate area.

6.14 It is also important to ascertain whether the proposed development will significantly impact the potential of the site as an area of traditional employment. It is envisaged that construction of the site will generate employment for 5 workers. Maintenance of the facility will also create additional long-term employment capacity, and will support employment for highly skilled engineers during its operational lifespan. These jobs will be sourced locally where possible.

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6.15 The site is currently undeveloped and the proposed development provides an opportunity to effectively utilise this area of land within the wider industrial estate, whilst also providing essential supporting infrastructure needed to support the National Grid, and subsequently accords with Policy PS1, GDP1 and PS12.

Biodiversity and Landscape

6.16 An Ecological Assessment was also prepared by Ensafé to support this application. An Extended Preliminary Ecological Assessment Report was undertaken on the application site in July 2020. The assessment identified that the Wrexham Industrial Estate is an importance site at the European level for protected species including great crested newts and as such is the subject of specific policy requirement as part of LPG 29.

6.17 The assessment concluded that despite the application site having suitable habitats for protected species, given the poor connectivity as the application site is completely enclosed by roads and the industrial area, it is unlikely to support these species.

6.18 The assessment came to the following conclusions and recommendations regarding habitats and protected species, which have informed the development proposals:

- Approximately 33% of the habitats on the application site should be retained.
- Tree and shrub removal works has been completed prior to the breeding bird season (March – September inclusive). The remaining trees and areas beyond the fence line boundary of the proposed development should be managed to provide for habitats suitable for the target species.
- These enhancements should be managed through the development of a Construction Environmental Management Plan (CEMP)

6.19 Precautionary working methodologies should be undertaken in respect of reptiles.

6.20 Removal of invasive species prior to the commencement of works..

6.21 The additional enhancement measures will be implemented by the applicant as part of the development. The recommendations include:

- The site currently contains a variety of differing habitats but lacks in its overall quality for provision of habitats for a number of species.
- The development will provide and maintain key corridors to allow the ecological enhancement areas to be linked

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- The areas will be provided with hibernacula for provision if over wintering hibernation areas and
 - The management plan will ensure that the site retains its ecological value long-term with a focus on reptiles/amphibians, along with breeding birds.

6.22 The above measures are not barriers to the development and the above mitigation measures have been incorporated as a central theme to the development plans. These measures ensure that the development meets the tests of Policies PS2, EC4 and LPG 29.

Suitability of the Proposed Development Site

6.23 In light of the above context, the Proposed Development Site at Bridge Road North is considered highly suitable for the proposed generation facility. It is industrial land, which is adjacent to an existing industrial use and is a considerable distance from surrounding residential properties. It is therefore considered that this Proposed Development accords with Wrexham Local Development Plan.

Other Material Considerations

Sustainable Development

6.24 In line with the requirements of the PPW and Policies within the Wrexham Local Development Plan the Proposed Development on this site can be considered sustainable development. The Proposed Development seeks to support sustainable development by contributing to the three core strands.

6.25 Planning should play an economic role by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. The proximity of available grid and gas connections make the application site an extremely economically efficient location for the proposed plant. Being able to make economically viable connections for flexible generation facilities is essential to ensuring the costs of energy for households across the UK is kept at an acceptable level.

6.26 The Proposed Development Site is in a well enclosed location, within an existing industrial estate and a suitable distance from the nearest sensitive receptors. It will therefore have minimal impact on the amenity of the local community. It has been demonstrated through technical surveys that the Proposed Development will not give rise to harm from a noise or air quality point of view.

6.27 The applicant has submitted with this application the Construction Transport Management Plan

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which details the transport requirements for the development in both the construction and operational phases. The CTMP shows the applicant has considered the design of the facility to optimise the sustainable nature of the transport, ensuring provision for multi-occupancy transport and local transport providers for site personnel. These measures will all contribute to the reduction in need of single occupancy car journeys. In addition the development is designed to ensure that there is no on-street parking. All construction deliveries will be received, unloaded and dispatched within the development boundary. Operational vehicular access is minimal, and any visitors will be able to park within the secure site boundary. The proposal therefor meets the test of policy T8 and LPG 16.

- 6.28 Policy PS12 is in regard to renewable energy. The nature of most renewable energy is that the generation source is intermittent and variable. There is therefore a need, as described within this Planning Statement for an alternative means of ‘low-carbon’ generation that can be used as a tool by National Grid to maintain electricity supplies in periods where renewable energy is or has fallen to lower than required levels. This generation needs to be reliable, available on demand, fast in terms of response time and ideally embedded at point of use to avoid transmission losses. This development enables the continuing development of renewable energy and the national drive to a Net Zero Policy by 2050 and is therefore a crucial part of enabling the ambitions of Policy PS12 being achieved.
- 6.29 Policy EC12 defines development policy within defined flood plains. The proposed site of the facility is outside of the adjoining flood zones. But in recognition of the adjoining flood zones the applicant has prepared their FCA and Drainage Strategy. The proposed development does not adversely impact upon or present an unacceptable flooding risk and many of the benefits of the development result in a lowering of flood risk through long-term management of the otherwise vacant unused land which is at risk of creating greater flooding risk than the development proposed.
- 6.30 The proposed location is in close proximity to grid and gas connections will also ensure any infrastructure works to connect the plant to the network will be extremely limited, and any disruption to the local community will be therefore be minimal.
- 6.31 The Proposed Development Site represents an environmentally sustainable site for the Proposed Development. The scheme has been designed to minimise the loss of any of the surrounding woodland and provide benefits through enhancement of the land and provision of areas set aside for ecological benefits. Given that the Proposed Development would connect into the local distribution network via underground cables and will result in improved carbon efficiency of the plant by avoiding transmission losses over long distances.

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Biodiversity and trees

- 6.32 The Preliminary Ecological Assessment Report concluded the development would not impact upon designated biodiversity sites or species. There was no evidence of invasive species found on or near the site. Based on the current layout the development would result much of the existing boundary treatments being retained, including existing shrubs and trees. Mitigation will be undertaken within the land immediately adjacent and south of the proposed site. The environmental set-aside area will be managed to provide and enhanced area of ecological management. Grassland planting will further enhance biodiversity around the southern area of the site. It is therefore concluded that there would be no conflict with the Wrexham Local Development Plan.

Heritage

- 6.33 There are no heritage features or archaeological records on the Proposed Development Site and there would be limited impact on any heritage features. It is therefore concluded that there would be no conflict with any heritage assets.

Design/ Visual Impact

- 6.34 The Proposed Development Site is located within an existing industrial area. The Proposed Development is of a utilitarian design focussing on functional efficiency and minimising the overall development footprint. The design and layout of the site is not out of character with buildings and infrastructure elsewhere within the industrial estate. It is therefore concluded that there would be no conflict with the policies of the Wrexham Local Development Plan.

Amenity

- 6.35 The noise and air quality impact assessment shows that the noise and emissions egressing from the Proposed Development would not exceed acceptable background noise levels or air quality at the nearest sensitive receptors. It is therefore concluded that there would be no conflict with the Wrexham Local Development Plan.

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7. CONCLUSION

- 7.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 The Proposed Development Site is not allocated within the Local Plan although it is located within the Wexham Industrial Estate and noted as a site for employment uses. The site is currently unused land.
- 7.3 The golden thread within current planning policy is a presumption in favour of sustainable development. This Statement demonstrates that the principle of sustainable development has been taken into account and that the Proposed Development accords with core policies for a sustainable development.
- 7.4 The Proposed Development is constrained by the identification of a site which has a viable grid connection and is commercially available. In addition, it has been demonstrated that the harm to the environment and residential amenity is minimised as the Proposed Development Site is located within the existing industrial estate. It is therefore concluded that there are material considerations why this location is considered appropriate in this location.
- 7.5 The proposal would not lead to an unacceptable increase in noise levels above existing background noise, at the nearest noise sensitive receptors.
- 7.6 The Supporting Statement and appendices demonstrate that there would be no significant environmental harm from the implementation of this Proposed Development and therefore accords with the policies of Wrexham Local Development Plan.
- 7.7 For the above reasons, when read in conjunction with other Statements and studies submitted with this planning application, it is considered that this development accords with the Local Plan and/or material planning considerations to enable the planning department to approve this planning application.
- 7.8 Nationally, the development proposed reflects the Government's energy policy priorities in relation to promoting a decentralised electricity network which can respond in an efficient and effective way to the modern demands of businesses and residents and ensure security of supply. It is considered that this is a material consideration to the planning application.