



**LAND TO THE WEST OF PENTIR
SUBSTATION**

ENERGY STORAGE SYSTEM

Planning, Design & Access Statement

May 2024

Prepared for:
Lightsource bp

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EXECUTIVE SUMMARY

This Planning Design and Access Statement has been prepared by Stantec on behalf of Lightsource bp in support of full planning application for the installation and operation of a Battery Energy Storage System (BESS) including energy storage units, substation, site access, landscaping, and ancillary infrastructure at land to the west of the existing Pentir substation, accessed from Fodolydd Lane, a minor road off the B4547. Cable connection will be secured via a separate planning application.

There is a recognised need for energy infrastructure developments of this nature to support Welsh Government's targets to reduce 100% of greenhouse gas emissions by 2035. To achieve this target, the energy market is undergoing major transformation both within Wales and further afield with a move to smarter, more connected energy systems, that integrate energy generation, storage, and energy efficiency measures.

Planning Policy sets out Welsh Government's expectation that energy generation storage and management will play a role in supporting the regional economy in North Wales. The development proposed provides an opportunity for a BESS with a capacity of 57MWac which would add a significant quantum of energy storage capacity to the Electricity System Operator at the strategically important Pentir substation, thereby playing an important role in addressing the challenge that faces grid infrastructure and capacity to accommodate the growth in locally and regionally generated renewable energy, and the resulting security that this brings.

This Planning Design and Access Statement assesses the Proposed Development against adopted and emerging development plan policies, national planning policy and guidance, and has regard to applicable material planning considerations. Alongside the extensive suite of accompanying planning application documents, the need for the Proposed Development in this location is demonstrated, and the impacts of the development are concluded to be in accordance with applicable policies. It is ultimately concluded that planning permission should be granted.

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1 INTRODUCTION

1.1 Overview of Application

1.1.1 Stantec UK Ltd (Stantec) is instructed by Lightsource SPV 191 Limited ('Lightsource bp' or 'the applicant') to submit a full planning application to Gwynedd Council ("the Council") for the installation and operation of an Energy Storage System (BESS), including energy storage units, substation, site access, landscaping, and ancillary infrastructure ('the Proposed Development') at land to the west of Pentir Substation, accessed from a minor road (Fodolydd Lane) off the B4547, Pentir ('the site').

1.1.2 This Planning, Design and Access Statement (PDAS) sets out the context of the Proposed Development and assesses it against the relevant planning policy framework. The report follows the following structure:

- Chapter 2: Site Description and Surrounding Context
- Chapter 3: Planning History and Pre-Application Engagement
- Chapter 4: The Proposed Development
- Chapter 5: Design and Access Considerations
- Chapter 6: Planning Policy Context
- Chapter 7: Planning Assessment
- Chapter 8: Summary and Conclusions

1.1.3 The submission comprises the following documents and plans as set out in Table 1.1 below:

Table 1.1 Submitted Plans and Documents

Supporting Document	Produced By	Date
Planning Application Forms and Certificates	Stantec	<i>[add submission date for planning application]</i>
Site Location Plan No. AD_SLP	Lightsource bp	February 2024

Supporting Document	Produced By	Date
Proposed Site Layout Plan GBR_Pentir_Indicative BESS Layout_05 No. BESS_LYT	Lightsource bp	March 2024
Landscape Strategy Plan No.100 Rev D	RPS	April 2024
Illustrative Photomontages Figures: 4893-0002_1-13	RPS	October 2023
Equipment Elevations and Plans	Lightsource bp	April 2024
Planning, Design and Access Statement	Stantec	April 2024
Pre-Application Consultation Report	Grasshopper Communications	<i>This will be prepared following the statutory PAC period.</i>
Arboricultural Impact Assessment	RPS	January 2024
Outline Construction Traffic Management Plan	Stantec	April 2024
Transport Statement	Stantec	April 2024
Noise Survey and Acoustic Report	inacoustic	March 2024
Landscape and Visual Impact Assessment	RPS	April 2024
Cultural Heritage Desk-Based Assessment	RPS	April 2024
Desktop Study and Preliminary Risk Assessment	RPS	April 2024

Supporting Document	Produced By	Date
Flood Consequence Assessment and Drainage Assessment	RPS	March 2024
Preliminary Ecological Appraisal	Tyler Grange	December 2023
Green Infrastructure Statement	Tyler Grange	January 2024
Outline Battery Safety Management Plan	Abbott Risk Consulting	April 2024

1.2 Need for the Development

1.2.1 The UK has a legally binding target to achieve Net Zero by 2050 and has committed to fully decarbonising the electricity network by 2035. The Welsh Government has already set an ambitious target for Wales to meet 70% of its electricity needs from renewable sources by 2030¹, and 100% by 2035². This results in the need to significantly increase the number of low carbon and renewable developments across the UK. Renewable energy generation is intermittent, and BESS's help to balance this by storing electricity at times of low demand and releasing it at peak demand. This allows us to make better use of our existing electricity supplies and for electricity generated from renewable energy sources to be fully and efficiently utilised.

1.2.2 There is a recognised need for the expansion of the renewable energy industry in both national and local planning policy. The promotion of energy efficiency is devolved to Wales; however, Welsh Government does not have the power to regulate on energy efficiency. Welsh Government has committed to continue to work with the UK Government in respect of

¹ Paragraph 5.7.3 of Planning Policy Wales Edition 12

² [Written Statement: Publication of Summary of Responses to the Consultation on Wales' Renewable Energy Targets \(14 July 2023\) | GOV.WALES](#)

regulatory measures and will also pressure UK Government to frame its energy efficiency measures for the benefit of the people, economy, and environment of Wales.

- 1.2.3 Despite its limited powers, Welsh Government is determined to realise its ambition to maximise the potential impact of energy efficiency actions. In 2016, Welsh Government developed a new strategy for the next 10 years (2016-2026) for energy efficiency in Wales. The vision for a more energy efficient Wales by 2025 is as follows:

“We want to ensure that Wales is in the best possible position to realise its full energy efficiency potential and become a major exporter of energy efficiency technology and know-how.”³

- 1.2.4 The Welsh Government declared a climate emergency in 2019 and set a target to reduce 100% of greenhouse gas emissions by 2035. To achieve this target, the energy market is undergoing major transformation both within Wales and further afield with a move to smarter, more connected energy systems, that integrate energy generation, storage, and energy efficiency measures.

- 1.2.5 Future Wales (the national development framework for Wales to 2040) (Page 118) also sets out that Welsh Government’s wish to see energy generation, storage and management play a role in supporting the regional economy in North Wales.

- 1.2.6 The North Wales Energy Strategy 2021 (published by Welsh Government) sets out the following vision for North Wales:

“Delivering maximum local economic, social, ecological and wellbeing benefits from transitioning to a net zero economy and becoming a net exporter of low carbon electricity through cross-border and regional cooperation.”⁴

³ Welsh Government. 2016. Page 8, Paragraph 1 of Energy Efficiency in Wales. [energy-efficiency-strategy.pdf \(gov.wales\)](#)

⁴ Welsh Government. 2021. North Wales Energy Strategy. [Strategaeth ynni gogledd Cymru /North Wales energy strategy \(gov.wales\)](#)

1.2.7 In terms of energy storage, the strategy notes that no large-scale batteries have been installed in North Wales to date (as at 2021). However, the deployment of electricity storage, alongside flexibility (such as demand side response provision or the creation of local energy markets), could support the decarbonisation of energy generation in North Wales by enabling more renewables to connect to the network in constrained areas and supporting the business case of investing in renewables.

1.3 Pentir Substation

1.3.1 The applicant is committed to developing, acquiring, and operating innovative renewable projects providing decentralised energy solutions and regeneration for the decarbonisation and sustainability of the environment and local communities.

1.3.2 Energy storage is becoming a key technology to achieve net-zero and therefore more energy storage needs to be connected to the electricity grid as soon as possible. In the Future Energy Scenarios ⁵, which represent a range of different, credible ways to decarbonise energy systems, the National Grid Electricity System Operator (NGESO) indicated that the UK will need more than 25GW of energy storage by 2050. Currently, the UK is behind schedule on delivering the amount of energy storage required to enable a net-zero future. The slower the build out of energy storage the more it will cost to balance the network, increasing cost to bill payers. The 57MWac capacity BESS development being proposed at Pentir will add a significant amount of energy storage available to the Electricity System Operator (ESO). Importantly this project can connect into the network in 2027 providing an early opportunity to deliver significant benefits to the network and renewable energy transition.

1.3.3 The intermittency of renewables means that the power flows across the network will be very volatile, at times of high winds the network will experience large power flows from North to South, and at times of low wind and high solar the network will experience large power flows from South to North. Traditional thermal power stations have large rotating masses which

⁵ [Future Energy Scenarios | ESO \(nationalgrideso.com\)](https://www.nationalgrideso.com)

provide inertia and therefore stability to the electricity system. The majority of renewable generators use inverters with no moving parts and therefore do not provide inertia. As the proportion of electricity generated by renewables increases the stability of the network will decrease creating volatile swings in frequency and voltage on the network. Because of the location of the Pentir National Grid Substation ('Pentir Substation'), which is adjacent to the east of the site, the circuits around it will be subject to large swings in power flows, and therefore large fluctuations in voltage, due to changes in the intermittent renewable energy.

- 1.3.4 The proposed 57MWac BESS will be able to provide significant reactive power, which supports the voltage of the network, and other stability services such as dynamic regulation to help enable a 100% renewable energy electricity network. Pentir Substation is strategically important at both a regional and national level, because of its position on the network receiving energy from large solar installations on Anglesey and existing and consented off-shore wind farms in the Irish Sea. It is therefore vital that maximum advantage is taken to store and use the energy potential of this location.
- 1.3.5 A cable is required to connect the site to the Pentir Substation. The installation of a cable is expensive and complex, and requires trenching works; therefore, to minimise the impact of the project on the local community and ensure the project is deliverable, the applicant has placed the development site as close to Pentir Substation as possible. An application for the cable route is to be submitted separately and does not form part of this proposal.

2 Site Description and Surrounding Context

2.1 The Site

- 2.1.1 The site (as shown in Figures 1 and 2 below) is located within the administrative area of Cyngor Gwynedd Council (CGC), approximately 2km to the south of Bangor, south of the A55 North Wales Expressway and north of the B4547. The site is bound to the east by the existing National Grid Pentir substation and surrounding woodland. To the south of the site lies agricultural land and to the north of the site lies an unnamed road and a small landholding. To the west of the site lies Fodolydd Lane.
- 2.1.2 The site extends to 2.59 ha and comprises one irregular shaped field primarily used for pasture grazing. The field is bound by a mixture of woodland (mostly conifer) to the south and east with field parcels delineated by low hedgerows and scattered trees. The site benefits from well-established screening due to local topography and existing vegetation.
- 2.1.3 An access track is proposed from Fodolydd Lane to the west, where there is an existing gated field access, which will run through the adjacent field to the west, entering the north-west corner of the field that comprises the main development site.



Figure 1: Site Location (Aerial)

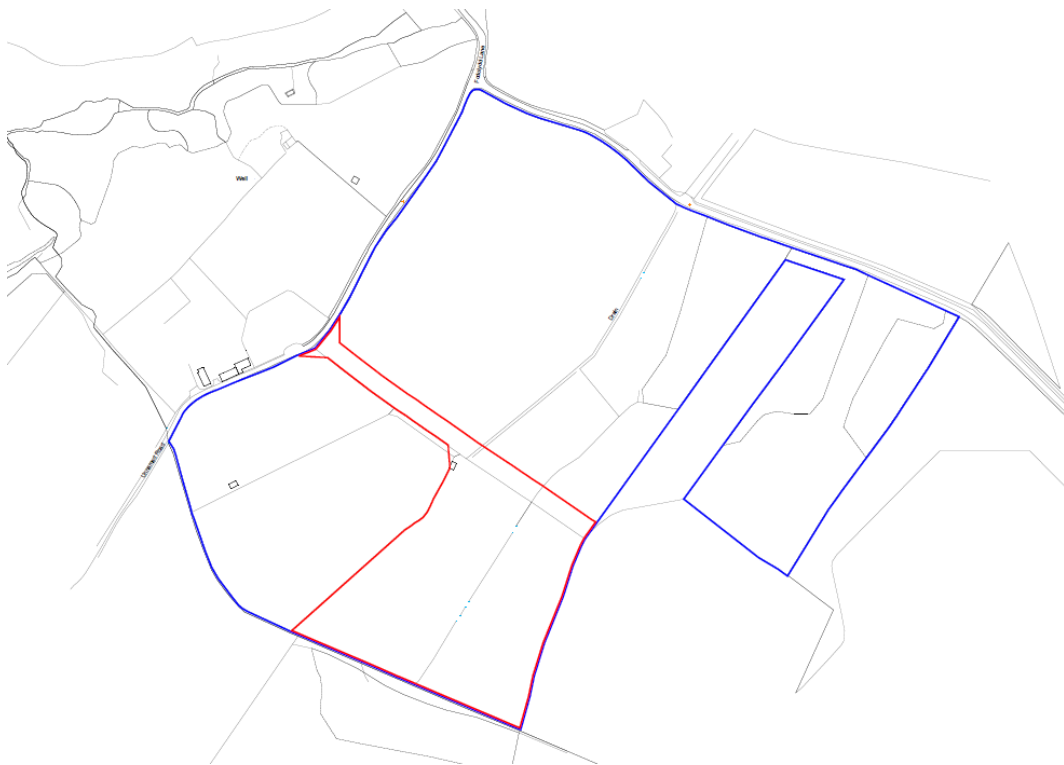


Figure 2: Site Location (OS)

2.2 Surrounding Context

- 2.2.1 Agricultural land and uses form the site's predominant surroundings to the north, south and west with pockets of isolated residential properties and farmsteads dispersed throughout.
- 2.2.2 The Pentir Substation, which the proposals will connect to, is located approximately 200m east of the site beyond a belt of woodland.
- 2.2.3 The nearest settlements to the site are Pentir (approx. 2.1km to the east), Rhiwlas (approx. 2.5km south east), Treborth (approx. 2.25km north west) and Caerhun (approx. 2.3km to north east). The nearest residential property is located 197m to the north west of the site along Fodolydd Lane. The operational farm Tyddyn Forgan sits approximately 175m to the south.

2.3 Site Considerations

- 2.3.1 The applicant has sought to identify any constraints that would need to be taken into consideration when planning the Proposed Development. A summary of these constraints and how they are addressed is set out below, with a more comprehensive assessment in Section 7 of this report.

Agricultural Land

- 2.3.2 The Predictive Agricultural Land Classification Map for Wales classifies the proposed site for the BESS itself as Grade 3b or lower quality land. However, the proposed access track from Fodolydd Lane is on provisional Grade 3a land. The vast majority of the site therefore consists of lower-quality agricultural land which is currently used for grazing, with a small area of Best and Most Versatile (BMV) land (Grade 3a).

Public Rights of Way (PRoW)

- 2.3.3 There are no PRoW impacted by the Proposed Development. The nearest PRoW is Llanddeiniolen No 111 which is approximately 0.5 km to the northwest at Garth Fawr.

Flood Risk

- 2.3.4 The site is not in a flood risk area, and is not affected by any flooding from the sea or from rivers; although there are small areas of the site affected by surface water flooding as a result of an existing drain which runs through the site.
- 2.3.5 Natural Resources Wales' (NRW) New 'Flood Map for Planning' also confirms that the site falls within Flood Zone 1 and is therefore at low risk of flooding.
- 2.3.6 A surface water management strategy has been produced to incorporate appropriate management techniques that will manage any potential increase in runoff from the Proposed Development.

Landscape

- 2.3.7 The submitted ZTV (zone of theoretical visibility) plans indicate limited potential intervisibility towards the site and the Proposed Development from the surrounding landscape, being particularly well screened to the south and east. There are limited views to the north and west.
- 2.3.8 Additional planting will be proposed to be concentrated to the westernmost and northern boundary of the site. This could include gapping up and reinforcing existing hedgerows along these boundaries, particularly at field entrances and accesses.
- 2.3.9 Other areas will be retained as existing grassland and suitably managed to increase the overall biodiversity within the site. Grassland habitat creation / management will be carried out in accordance with any ecological recommendations.
- 2.3.10 Full details of proposed landscaping measures are described in later sections of this PDAS and other accompanying documents, such as the LVIA prepared by RPS, and Green Infrastructure Statement prepared by Tyler Grange.

Heritage

- 2.3.11 The site is located within the Dinorwig Registered Historic Landscape. There would therefore be potential impacts upon a small part of this designated area. This is a heritage designation and as such is assessed as part of the Heritage Impact Assessment of the development, and is taken into consideration within the Landscape and Visual Impact Assessment (LVIA).
- 2.3.12 The site does not contain any designated heritage assets (World Heritage sites, Scheduled Monuments, Registered Parks and Gardens, Registered Historic Battlefields, Historic Wreck sites or any listed buildings). Neither is the site within or adjacent to a conservation area.

Ecology

- 2.3.13 The site is not subject to any statutory ecological designations, however, due to the nature of the site, a preliminary ecological survey has been undertaken, the details of which are summarised below and a formal, detailed Preliminary Ecological Appraisal accompanies this planning application.

Designated Sites

- Menai Strait and Conwy Bay SAC – International importance (approx. 3km away)
 - Snowdonia SAC – International importance (approx. 3.5km away)
 - Lavan Sands, Conway Bay SPA – International importance (approx. 6km away)
- 2.3.14 The above three designations are within 10km of the site and, therefore, within the Zone of Influence for designated sites. The site is not within 2km of any SSSI's. Due to the small scale of the development, with no direct linking habitats or hydrological habitat corridors between the site and the two SAC's, impacts are considered unlikely.
- 2.3.15 Lavan Sands SPA is designated for its overwintering populations of Oystercatcher; the site is not considered suitable for this species, because in winter Oystercatcher will largely remain close to the mudflats and shorelines where they feed - or inland open-bodies of water – neither of which habitats are present on site or adjacent to it. Impacts upon the SPA is therefore considered to be unlikely.

Habitats

2.3.16 The site largely comprises open modified or improved grassland fields which are heavily grazed by horses. The south-eastern field, proposed for the BESS, comprises a more rush-grassland habitat, however all three fields are considered to be of negligible ecological importance based on the low species diversity and heavily grazed management. The fields are divided by hedgerows, with a small tree line to the south of the south-eastern field. It is anticipated that a proportion of the hedgerow habitat would qualify as a UK Biodiversity Action Plan (BAP) Priority Habitat and / or 'Important' under the Hedgerow Regulations 1997, due to their length and species combined.

Species

- **Amphibians/GCN** – there are no ponds on site or within 250m of the site. The site is considered to provide unsuitable habitat for GCN and notable amphibians during their terrestrial phase. This species group is unlikely to be impacted by the proposals.
- **Badgers** – the conifer plantation woodland to the east of the site could provide sett building habitat. A site walkover was carried out and no badger setts were observed.
- **Bats** – the site is considered to provide limited foraging and commuting opportunities for bats, due to the open-grassland nature, with few suitable foraging and commuting features, other than the boundary hedgerows and one treeline.
- **Bat Roosts** – the treeline to the south of the south-eastern field could provide bat roosting potential, however, proposals include its retention. Considerations for minimal lighting levels during nighttime hours should be considered.
- **Birds** – the site offers largely unsuitable breeding and overwintering habitat for protected and notable bird species; with anticipated suitable habitats being confined to the boundary vegetation, which is largely being retained. Further surveys for breeding and overwintering birds are not considered necessary, but measures to safeguard common and widespread species which may utilise the boundary vegetation should be considered.

- **Otter/ Water Vole** –There is a ditch running north-south through the Site, which could provide suitable habitat for water vole (but not otter), however, it does appear to be small and unconnected to other watercourses/ ditches within the wider area.
- **Reptiles** – the site is considered to provide unsuitable habitat for reptiles, due to the open expanses of heavily grazed grassland. The only suitable habitat within the Site for reptiles is a small strip to the north (Field F2), and so development has avoided this field. This species group is therefore unlikely to be impacted by the proposals.

3 PLANNING HISTORY

3.1 Planning History

3.1.1 The site is not subject to any known planning history, however it lies immediately adjacent to the existing National Grid Pentir Substation. The Dinorwig to Pentir underground cable replacement project is expected to result in some works to the Pentir Substation, although it is expected that these works will be confined to within the operational boundary of the existing substation.

3.2 Pre-Application Engagement

3.2.1 In November 2023 a pre-application enquiry was submitted to Gwynedd Council under ref. Y23/0818. A number of technical documents were provided with the enquiry to aid the planning officers' in issuing their pre-application advice (Appendix A).

3.2.2 A preliminary pre-application meeting was held on 20 December 2023, with the following points confirmed by the Council:

- Development proposal acceptable in principle – logical location adjacent to existing substation and ancillary equipment, removed from residential and other forms of development a well-screened site.
- Key issues to be addressed in formal submission relate to noise and visual impact.
- Ecological impact and mitigation an important factor.
- Any loss of agricultural land to be justified in the planning statement.
- Potential drainage issue that will need to be addressed at formal application stage.

3.2.3 The written pre-application advice was received on 8 January 2024 was generally supportive of the development proposals stating that, as submitted, the Proposed Development would, on balance, be considered to be acceptable in principle.

3.2.4 Key requirements arising from the written advice were as follows:

- Production of a LVIA to support the planning application will be essential. Any assessment should include viewpoints from nearby publicly accessible locations along with higher ground to the south east e.g. Moel y Ci and Moel Rhiwen, and the Anglesey Area of Outstanding Natural Beauty.
- A detailed Landscaping Plan should be included with any planning application – this should include measures for biodiversity mitigation and enhancement.
- The Gwynedd ecologist confirmed that a Green Infrastructure Statement and badger survey will be required.
- The site is within the Dinorwig Landscape of Outstanding Historic Interest designation and that fact will need to be taken into account as part of any LVIA produced. It will also be necessary to acknowledge and appraise the impacts from any nearby heritage assets i.e. Scheduled Ancient Monuments and Listed Buildings.
- A noise assessment will be an essential element in assessing the impacts upon nearby sensitive locations.
- Council maps indicate that a watercourse runs through to the Proposed Development site, and the proposals involve crossing this stream at two locations. Ordinary Watercourse Consent will be required for any works that may affect the flow of the stream.
- A need for a strong case to justify loss of any BMV within the planning statement.
- The cumulative visual impact of the existing National Grid Sub-station with this proposal will need to be fully assessed within any LVIA.
- Requirement for a Transport Statement as part of the full application.
- Welsh language considerations to be addressed in the PDAS.
- Advice concludes that *“This site is in “open countryside” where development must be strictly controlled however Policy ISA 1 is supportive of the provision of improvements to existing infrastructure and, considering the site’s location adjacent to an existing*

strategic energy facility, the proposed use would appear to be generally consistent with its setting and is likely to be acceptable in planning terms.”

3.2.5 As set out in Table 1.1 (above), a suite of technical documents has been provided with the submission in line with the pre-application advice received.

3.2.6 On 17 November 2023 a Screening Request for the Proposed Development under the Environmental Impact Assessment (EIA) (Wales) Regulations 2017 was submitted to the Council. The Council responded with a Screening Opinion, dated 29 December 2023, which confirmed that the Proposed Development is not EIA development and, therefore, the submission of an Environmental Statement is not required.

3.3 Statutory Pre-Application Engagement

3.3.1 The PAC report details the formal pre-application consultation process that has been undertaken, the responses received and how the applicant has responded to these comments.

3.3.2 *This section of the statement will be updated to summarise the formal PAC process and its outcomes once the process is completed.*

4 THE PROPOSED DEVELOPMENT

4.1 Description of Development

- 4.1.1 This PDAS supports a full planning application for the following summary description of the development:

Proposed Energy Storage facility, related access, landscaping, infrastructure, ancillary equipment, with a grid connection import and export capacity of 57MWac.

4.2 Overview of Proposals

- 4.2.1 The proposal is for an energy storage project. This comprises a Battery Energy Storage System (BESS) and all ancillary infrastructure and associated works. Landscaping and ecological enhancement areas will also be included. The BESS is projected to have a storage capacity of 57MWac, and will include a cable route at a later date that will connect the BESS and its associated infrastructure to the Pentir Substation, located adjacent to the east of the site, north of the B4547. It is anticipated that the cable will be laid underground either via surface dug trenches of approximately 1m deep and 50cm wide and backfilled or by Horizontal Directional Drilling (HDD) as necessary. The cable connection between the Proposed Development and the Substation does not form part of this planning application.
- 4.2.2 A BESS allows for surplus energy from the grid to be stored and then released so that cheap energy can be provided at times when the energy is needed most by the grid, thus providing stability through more affordable energy prices at peak energy price times of the day. BESS can also provide grid stability services such as reactive power and fast response to manage voltage and frequency services. The function and importance of battery storage is set out earlier in this PDAS.
- 4.2.3 The proposed BESS development will comprise batteries within their enclosures, including associated monitoring and cooling systems, a combined Power Conversion System (PCS),

transformer units, a BESS Intake/customer substation, and associated electrical infrastructure. Other on-site infrastructure, such as access roads, storage areas, boundary treatments and CCTV are also proposed.

4.2.4 The Proposed Development consists of the following:

- 24 x Battery Blocks each comprised of 4x BESS enclosures (96 units in total)
- 3 x Twin Medium Voltage (MV) Skid (each comprised of 2 x Power conversion systems and 1 x MV transformer)
- 6 x Single MV Skid (each comprised of 1 x Power conversion systems and 1 x MV transformer)
- 1 x Monitoring House
- 1 x Backup Generator
- 1 x BESS Intake Substation
- 1 x Glass-fibre Reinforced Polyester (GRP) Cabinet
- 3 x Spares containers with 1x storage enclosure;
- CCTV cameras mounted on posts
- 1 x Welfare facility
- 3 x Storage containers
- 48 X BESS lighting poles
- Security fencing
- 4m Acoustic fencing
- Access and tracks
- Landscaping

4.2.5 The plans that accompany this submission show the proposed layout of the Development summarised above and include all elevations of the key structures. A more detailed description of the development is set out in the following Design and Access Considerations section (Section 5).

5 DESIGN AND ACCESS CONSIDERATIONS

5.1 Design and Access Statement Requirements

5.1.1 The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended) requires that, as a minimum, a Design and Access Statement (DAS) must explain the design principles and concepts that have been applied to the development; and how issues relating to access to the development have been dealt with. This is supplemented by the Design and Access Statements in Wales (July 2017) national guidance document.

5.1.2 Section 5 of the guidance sets out a recommended structure for DAS submissions as follows:

- a) Summary of the proposal
- b) The brief and vision
- c) Site and context analysis
- d) Interpretation
- e) Design development
- f) The proposal
 - i. Character
 - ii. Access
 - iii. Movement
 - iv. Environmental Sustainability
 - v. Community Safety
 - vi. Response to planning policy

5.1.3 This chapter provides an overview of the design and access considerations relevant to the site and the Proposed Development. A Summary of the proposal is set out in the previous section of this PDAS. Matters b)-f), listed above, follow.

5.2 The Brief and Vision

- 5.2.1 Energy storage facilities have specific locational requirements, namely they must be as near as possible to primary substations, such as Pentir Substation, in order to maximise efficiency and avoid the energy losses associated with distant connections.
- 5.2.2 The site is in a rural location, surrounded by open, undeveloped countryside, albeit the setting is very much dominated by Pentir Substation and its associated overland infrastructure. The very functional nature of a BESS development, being industrial in appearance, albeit low-lying, brings challenges to integrating the development into such a location. The overall 'Vision', therefore, is to maximise the efficiency of the land available to deliver as much storage capacity as possible with the least land take, whilst complying with relevant safety guidance on the spacing and positioning of development and avoiding harmful environmental impacts. In parallel, in accordance with the step-wise approach, the Proposed Development has aimed to avoid harm to valued biodiversity, by minimising losses of trees, hedgerows and important habitat, whilst maximising opportunities for on-site net benefits in biodiversity.
- 5.2.3 Further important considerations have included minimising the impact of the Development upon residential properties in the area, including through visual impact, consideration of noise, safety, and during construction activities, as well as ensuring operational safety by adopting the most up-to-date safety management technology, and securing the site appropriately.

Site Selection Process

- 5.2.4 A robust selection process was carried out to identify the optimum location for the Proposed Development. To avoid energy losses through long cabling energy storage should be located as close as possible to primary substations. The land immediately adjacent to Pentir Substation was therefore assessed as a priority search area (as shown in Figure 3).

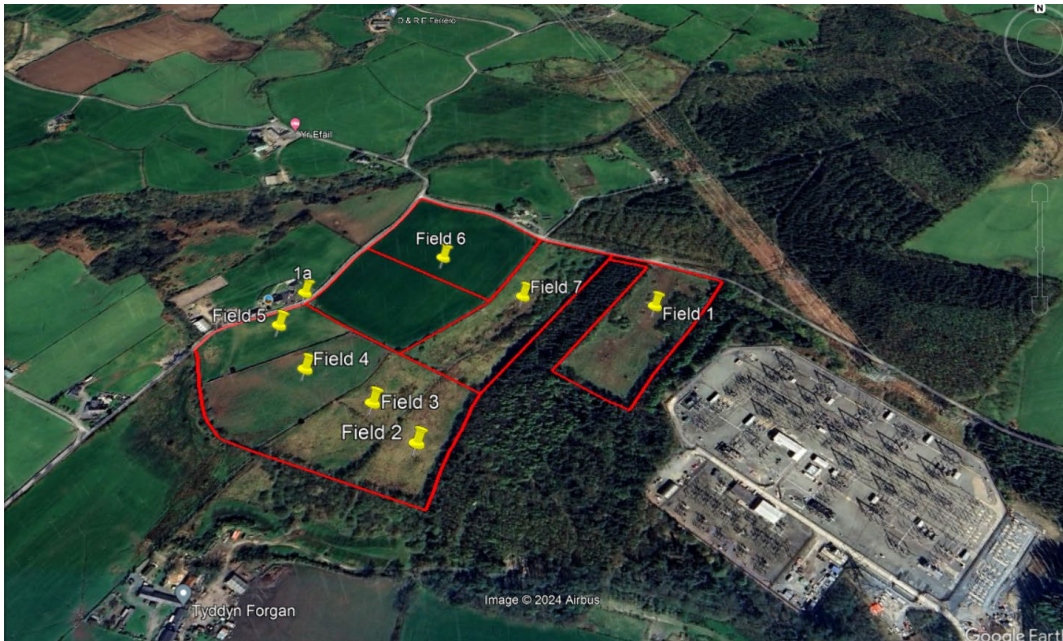


Figure 3: Area of Search

- Pentir substation itself was selected due to its strategic importance both locally and nationally. Pentir substation collects and transmits energy from around the country and is viewed as an important location to connect storage to add flexibility and improve energy security.
- Field 1 was discounted due to there being comparatively poorer access. The parcel is also enclosed by trees which could be deemed a health and safety risk in the event of an emergency. The existing shrubs and trees would need to be removed to facilitate the development, which would also be contentious from a biodiversity perspective.
- Fields 2 and 3 (the Application Site) were selected for their low-quality land, otherwise minimal environmental constraints, good access and low visibility.
- Fields 4 and 5 were discounted due to proximity to residences, potentially affecting visual amenity and noise impacts.
- Field 6 was discounted for main development due to it being indicative grade 3a Agricultural Land. The proposal seeks to limit impact on higher quality Agricultural Land where possible.

- Several watercourses run through Field 7, which not only impact developability of the parcel but also present flood risk constraints. The site was also found to have established shrubs and trees which would need to be removed to accommodate development.

5.2.5 The site selected for development performs excellently in terms of impacts on residential amenity, landscape and visual impact, ecological impacts, flood risk and loss of agricultural land. It is adjacent to the Pentir Substation and already benefits from an existing access point, making it a highly logical location for the Proposed Development. There are no other planning, heritage or land-based constraints restricting this development. As such, there are no other sites in the locality, which are known to be available, that would be better suited for the proposal.

5.3 Site Context and Analysis

5.3.1 The existing character of the development site and surroundings is as described above in Section 2.0.

Settlements

5.3.2 The nearest settlements to the site are Pentir (approx. 2.1km south east) Rhiwlas (approx. 2.5km south east), Treborth (approx. 2.25km north west) and Caerhun (approx. 2.3km to north east). The nearest residential property is located 250m to the north west of the site along Fodolydd Lane. The operational farm Tyddyn Forgan sits approximately 175m to the south.

Landscape

5.3.3 The site is set within the Caernarfon - Coast & Plateau Landscape Character Area. The site sits on a generally flat landform area, in contrast to the wider landscape, particularly to the southeast. At its highest point the Application Site sits at approximately 103 m Above Ordnance Datum (AOD), gently falling to the south to its lowest point at approximately 101 m AOD. Watercourses have cut through the landscape in multiple places feeding larger

watercourses such as Afon Cegin, a number of reservoirs and ultimately the Menai Strait (Afon Menai) to the northwest.

5.3.4 Neighbouring land uses comprise predominantly arable agricultural and grazing pastures, with a field pattern defined by hedgerows with occasional scattered trees and small woodlands. The field pattern is also influenced by the many small watercourses which cut through the landscape, often defined by areas of more scrubby vegetation. The OS map indicates a minor watercourse through the easternmost part of the site, however, this in reality is a dry ditch with limited standing water. This wider rural landscape is interspersed with scattered farmsteads, hamlets and individual buildings.

5.3.5 Land use within the Application Site is also pastoral (grazing) and arable farmland.

Biodiversity

5.3.6 The site is not subject to any ecological designations. There are no SSSIs or nationally important statutory sites for nature conservation located within 2km of the site.

5.3.7 Of the 32 wildlife sites within 2km of the site, one is adjacent (woodland of Pentir Substation). The woodland will not be impacted and will be provided with an appropriate buffer. The remaining 31 sites are considered to be of a sufficient distance away to avoid any adverse ecological impacts.

5.3.8 There is a Plantation on Ancient Woodland to the immediate east of the application Site.

Historic Environment

5.3.9 The planning application is accompanied by a Cultural Heritage Assessment, prepared by RPS.

5.3.10 The site is situated within the Dinorwig Landscape of Outstanding Historic Interest. There are no other heritage assets within the site or directly adjacent to it.

- 5.3.11 Within a 3km radius of the site, there are 10 Scheduled Monuments, 103 listed buildings, 1 Registered Park and Garden and 3 Conservation Areas. No other asset types are present within 3km of the site. The nearest designated heritage asset to the site is 660m to the north, which is Gors y Brithdir Enclosed Hut Group and Ancient Fields (Cadw ref CN203: Scheduled Monument - 660m north).
- 5.3.12 Following map analysis and ground truthing, and observing the views from within the site, no designated archaeological assets have been identified that could be subject to any significant impact from the Proposed Development.
- 5.3.13 The archaeological potential of the site is limited to the possible remains of a conjectured Roman road to the immediate west of the proposed access road.
- 5.3.14 There is a low potential for finds or features from any other period to be present anywhere in the site.
- 5.3.15 The submitted Cultural Heritage Assessment determined that there is the potential for impact on the setting of nine designated built heritage assets, the separately listed farm buildings associated with Ty'n Llwyn Farm.

Public Rights of way

- 5.3.16 There are some Public Rights of Way (PRoW) located within the immediate and wider areas surrounding the site. Submitted plans (Zone of Theoretical Visibility – 'ZTV') indicate very limited potential intervisibility to the Proposed Development from the local PRoW network.
- 5.3.17 Of those PRoW which fall within the ZTV, or close to it, the nearest to the site include PRoW Llanddeiniolen No 111, to the northwest at Garth Fawr, and PRoW Pentir No 14 to the north at Fodol. The ZTV has indicated very limited potential intervisibility from these PRoW, nonetheless, views for walkers using it have the potential to be impacted by the Proposed Development.

5.4 Interpretation

5.4.1 The interpretation of the site's constraints, alongside the operational needs of the Proposed Development has informed the design evolution (set out in section 5.5 below). A brief summary is set out below:

- Residential Amenity – the layout has been designed and amended to reduce the impact on local residents and visual receptors, such as they are. The tallest part of the development (the proposed substation) has been located in the northern part of the site, furthest away from the nearest residential and farm developments. A 4m Acoustic Fence is also proposed along the northern, western, and southern boundaries, which should, in any event, shield views of the structures within the compound from those directions. Additional screening through landscape planting is proposed to further reduce its visual impact.
- Landscape and Visual Impacts – introduction of compensatory and additional landscaping is proposed along site boundaries and within the site to reduce the visibility of the proposals from all relevant receptors, as well as to contribute towards biodiversity enhancements.
- Biodiversity surveys confirm that the site contains habitats of negligible and local importance. The majority of the developable area is considered to be of negligible ecological value (modified grassland), with three habitats of local ecological importance, namely scattered trees, hedgerows and a line of trees. The habitats of local ecological importance will largely be retained, buffered and enhanced, with only a small section of hedgerow being removed to facilitate the access road. Appropriate mitigation for any loss of habitat will be agreed with the Council's specialist ecologists and provided accordingly.
- Historic Environment – the heritage assets in the wider surrounding areas are considered to benefit from sufficient visual screening resulting from the distances

involved, as well as the mature woodland to the east and south of the site. The tallest equipment will be sited to ensure any (already minor) impact on the setting of heritage assets are minimised.

- Existing Vegetation – whilst the site already benefits from boundary hedgerows along northern and western boundaries, as well as existing mature woodland along the southern and eastern boundaries, further planting will be provided at these boundaries to help soften the visual impact of the proposals from the surroundings. Some minor vegetation removal will be required in order to deliver the development, but this has been limited to what is only strictly necessary. Where vegetation removal has been necessary compensatory planting is proposed, in the form of new hedgerows, individual trees, as well as tree clusters,

5.4.2 Further detail on the points above is provided later in this report.

5.5 Design Development and Evolution

5.5.1 Following pre-application discussions with a range of internal technical experts, and with statutory and non-statutory consultees, the Proposed Development submitted to the Council is in a form that has gone through several stages of evolution to respond to a range of technical and environmental considerations. The revised scheme is the result of a collaborative process with all necessary stakeholders.

Pre-Application Advice Request (November 2023)

5.5.2 A pre-application advice request was submitted to the Council in November 2023 and following a meeting with planning officers on 20 December 2023 a written response was provided on 8 January 2024. The plan below (Figure 4) shows the proposed layout as originally presented at the time of the pre-application advice request. The scheme presented was in its early iteration, with a focus on maximising the efficiency of the footprint available, with wider landscaping and ecological enhancement measures having not been fully developed.

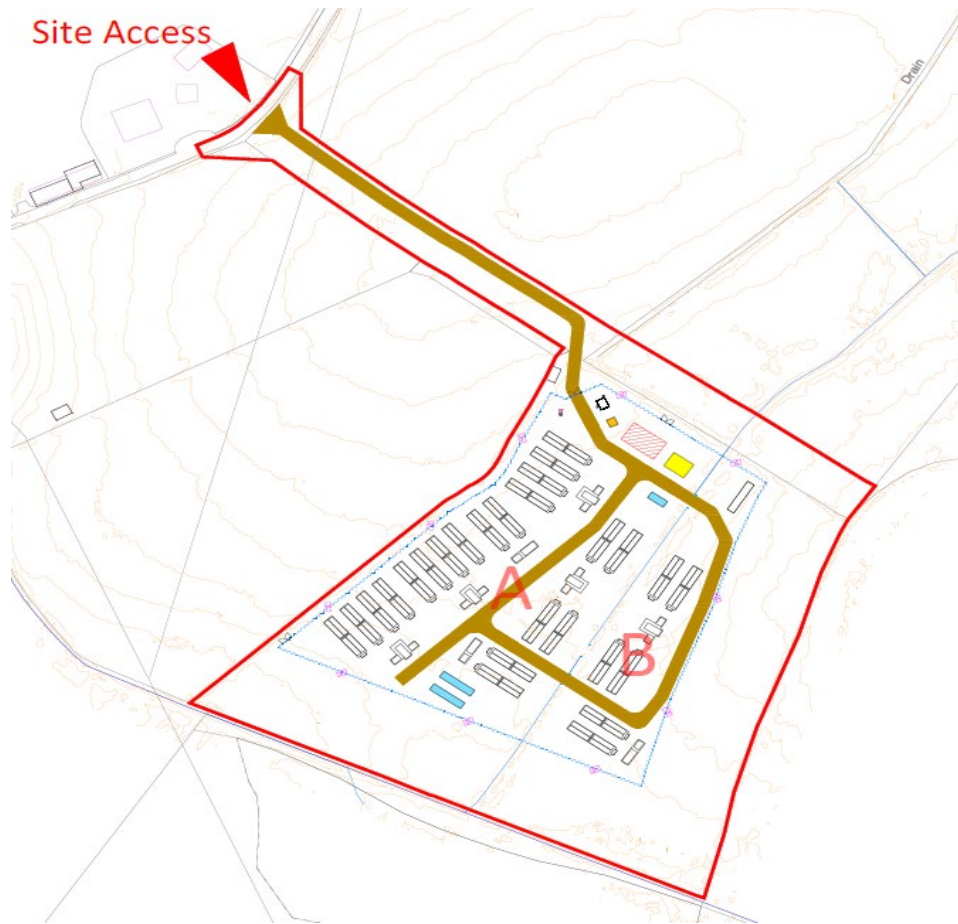


Figure 4: Proposed Layout - November 2023

Scheme Development

5.5.3 Following receipt of the Council's pre-application advice, and the advancement of the various technical assessments, the proposals developed with a number of internal adjustments, relating to operational requirements, and a landscape mitigation and ecological enhancement strategy for the site's perimeter. The next iteration of the proposals is provided in Figure 5 below.

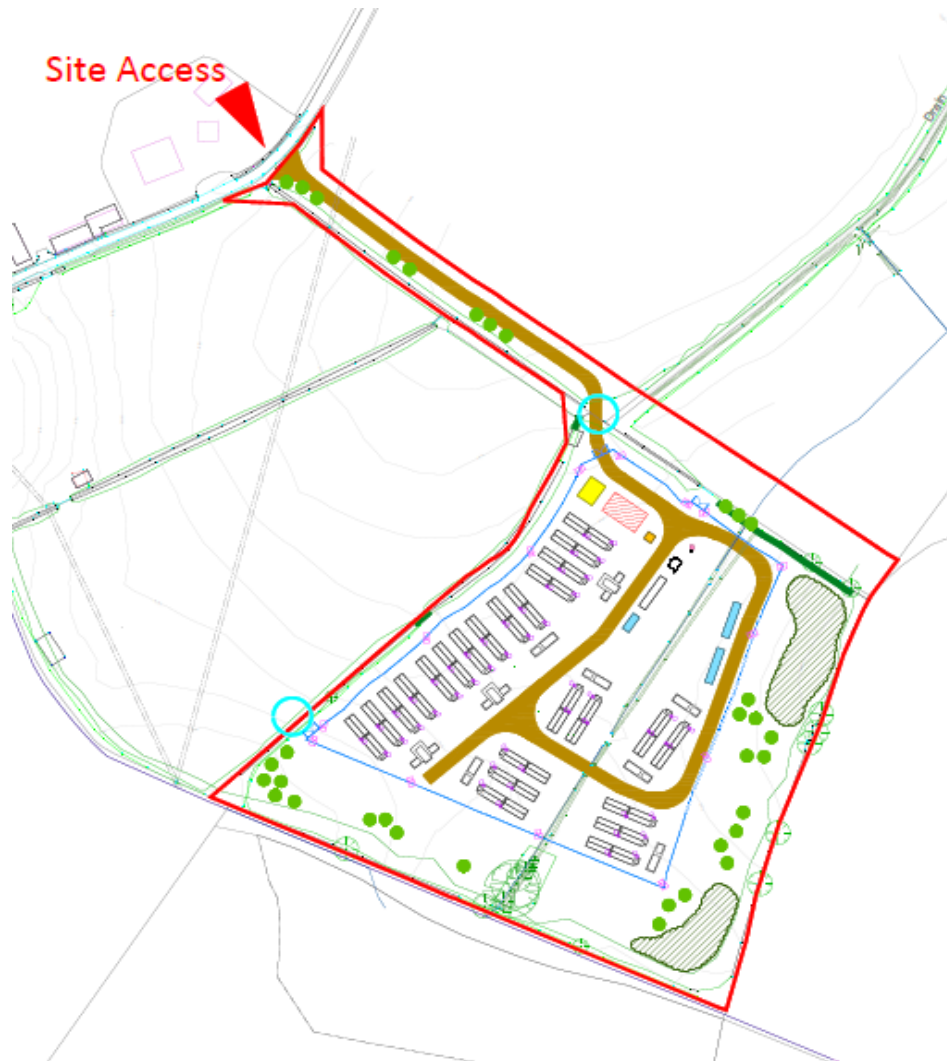


Figure 5: Proposed Layout – April 2024

5.5.4 The key developments in the site's design, between the November 2023 and April 2024 layouts were:

- New native tree planting between the access road and field boundary, and to the south and east of the main compound.
- New native tree and hedgerow planting to the north east of the site, and hedgerow reinforcement to the western boundary.
- 2 x new woodland copses to the east and south east of the site.
- Wildflower meadow creation adjacent to the access road, and between the perimeter of the compound and the field boundaries.

- The northern perimeter of the compound is moved south to reduce the impact on existing boundary vegetation and to make space for new hedgerow and tree planting.
- Relocation of all equipment to the inside of the internal access track to assist site efficiency and emergency access.
- Increase in the number of CCTV cameras to improve coverage.
- Removal of the on-site Transformer.
- Introduction of a break in the western field boundary hedgerow, adjacent to the south west corner of the site and emergency access gates, in order to allow for a secondary site access in the case of an emergency, to comply with the advice of the OBSMP.
- Installation of a 4m high acoustic fence to the compound's northern, western and southern perimeter, in order to reduce the impact of noise generated by the cooling systems on the closest dwellings, in accordance with the advice of the acoustic consultants.

Community Consultation (April - May 2024)

- 5.5.5 Following the refinement of the proposals resulting in the scheme set out in Figure 6, above, the design was fixed and technical assessments finalised for the purpose of undertaking the formal pre-application consultation (PAC) phase to engage the wider community and stakeholders and to seek feedback on the draft planning application proposals.
- 5.5.6 The PAC process is documents in the accompanying PAC Report, including the comments received from specialist and public consultees, and the responses to those comments.
- 5.5.7 *Following completion of the PAC process details of the responses received and how they have impacted upon the design evolution of the proposed development will be set out in this section.*

[Figure 6 to contain submission version of the proposed site layout]

Figure 6: Proposed Layout – Submission Version

5.6 Design Criteria

Layout

- 5.6.1 The detailed proposed Site Layout plan (Plan Ref: GBR_Pentir_Indicative BESS Layout_05) showing the layout of the Proposed Development is provided with the submitted plans, with an extract provided in the previous sub-section (Figure 6). The layout of the site has been developed to respond to its constraints and the proximity to the Pentir Substation, as summarised previously.
- 5.6.2 The BESS enclosures have been laid out across the site to make the most efficient use of the land, whilst adhering to good practice in relation to spacing and access. The largest structures proposed are the BESS Intake Substation (drawing no. GBR_EPD_BIS) and storage building (drawing no. GBR_EPD_STG), which are located in the northern part of site and well screened from available viewpoints by existing mature woodland to the east and south, as well as proposed landscaping to the north and west.
- 5.6.3 The most prevalent structures are the Battery blocks, of which there are 24, each containing 4 x BESS Enclosures (drawing no. UK_EPD_BSS). The blocks are set in rows, evenly spaced around the site with corresponding Skids (energy conversion and transformer units) (drawing nos. UK_EPD_TWS, UK_EPD_TWS-NR and UK_EPD_SNG). Space around the various structures is necessary for maintenance access, via circulatory access track, and to ensure the efficiency of the in-built cooling systems.
- 5.6.4 The principal access track is from Fodolydd Lane to the west, entering the compound to the north west of the main enclosure, which is surrounded by a combination of security and acoustic fencing, with perimeter pole-mounted CCTV cameras. The area between the fenced compound and the existing field boundaries is subject to extensive landscape creation designed to soften the landscape and visual impact of the development and enhance the sites biodiversity value.

5.6.5 During construction a temporary construction compound will be required, the details of which will be provided in respect to suitable planning conditions.

Scale and Appearance

5.6.6 The buildings and structures on site are functional and industrial in nature, and this is reflected in their appearance. For reasons of safety, security, robustness, insulation and ventilation, there are few options to soften the appearance of the structures themselves. Consequently, the choice of siting and use of existing and proposed landscaping is the principal means of influencing the impact of a proposed BESS development upon its surroundings. Screening of the various structures is also provided by the proposed 4m acoustic fence which is to be positioned around the northern, western, and southern boundaries.



Figure 7: BESS Enclosure - Lightsource bp site at Tilm, Nottinghamshire during construction

5.6.7 As stated above, the largest structure on site, with the greatest overall bulk and massing, will be the Intake Substation, measuring approximately 15.7m long x 3.6m high x 3m wide, which is effectively a rectangular cuboid in its appearance. The on-site storage building is the tallest structure measuring 14m long x 6.2m high x 9m wide (drawing no. GBR_EPD_STG). The

Battery blocks and BESS Enclosures (Figure 7) are the most prevalent structure, with each block measuring 16.6m long x 2.9m high x 3.8m. The Skids are either single or twin installations. The single Skids have overall dimensions of 9.8m long x 3.4m high x 2.9m wide, and the larger of the twin Skids, which include noise reduction features, are 13.4m long x 3.9m high x 6.9m wide.

- 5.6.8 Other ancillary structures on site are the back-up generator, which measures 12.2m long x 2.9m high x 2.6m wide (drawing no. GBR_FPD_G40), 3 x spares containers, the largest of which has the same dimensions (drawing no. GBR_EPD_S40), a monitoring cabinet/communications building (drawing no. GBR_EPD_MH/CB) and staff welfare facility.

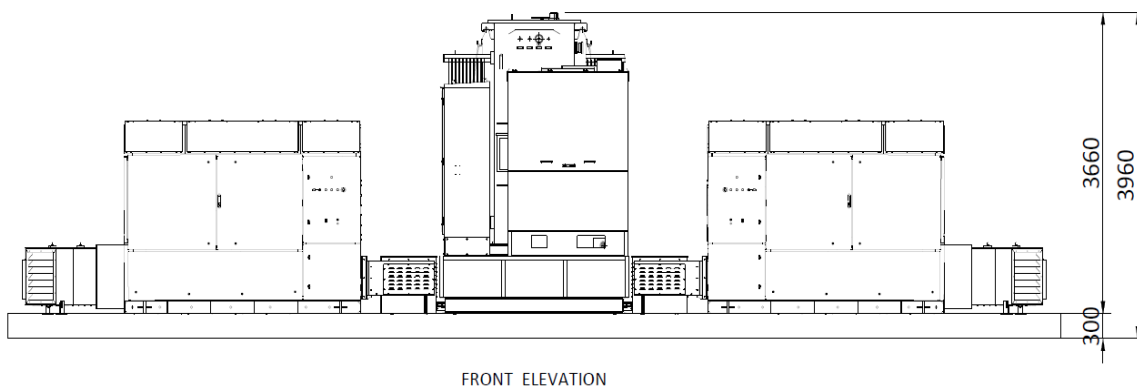


Figure 8: Twin Medium Voltage Skid

- 5.6.9 The perimeter of the main compound will be secured by fencing. To the north, west and south boundaries this will take the form of a 4m high absorptive acoustic fence (drawing no. GBR_EPD_ACF). On the eastern boundary a 2.5m high security fencing (drawing no. GBR_EPD_BSF) will be installed, owing to there being no noise sensitive land uses to the west of the Site.
- 5.6.10 The final surface colour finish of all structures is yet to be agreed. This will be largely dictated by the chosen suppliers and manufacturers of the equipment, as well as the preferences of

the local planning authority. This matter is expected to be the subject of agreement via a planning condition.

Access & Movement

- 5.6.11 During the operational phase of development there are very few expected transport movements associated with the site, other than for maintenance or repair of the equipment. The construction phase of development will see higher levels of vehicle movement to and from the site. An Outline Construction Traffic Management Plan has been submitted with the application to set out proposed procedures to manage construction traffic. It confirms that abnormal loads (AIL) are not anticipated. However, should an AIL be required, it will be the responsibility of the haulier, in collaboration with North Wales Police and affected local highway authorities, to determine the routing and requirements of the AIL movement. These will be determined by the configuration of the load, depending on its height, width, weight, and length. The need for escort vehicles would be determined through that process. The haulier will be required to make use of relevant guidance such as the FORS abnormal load toolkit and the ESDAL or AbHaulier notification processes.
- 5.6.12 Access to each energy storage block and the ancillary structures will be provided via the internal circulatory access track, which will accommodate the majority of construction movements as well as future maintenance requirements of proposals.
- 5.6.13 Primary access to the main development site during construction and operation will be from Fodolydd Lane via a new access track across the adjacent agricultural field to the west. The main access track will closely follow the existing southern mature hedgerow of that field parcel, without impacting on the hedgerow itself, in order to reduce the visual impact of the access and ensure that the field remains usable for agricultural purposes. A secondary emergency access is proposed from further south along Fodolydd Lane, with access to be taken across the field (no track is proposed) to the south west corner of the site, only in the case of an emergency.

Landscaping

- 5.6.14 A multi-functional approach to the landscaping of the site has been taken. In the first instance, in designing the site layout as much of the existing hedgerows and trees as possible have been retained. Where it has been necessary to remove some sections of hedgerow for the purpose of creating access into and around the site, this has been limited to that which is only, strictly necessary.
- 5.6.15 The efficient planning of the site layout leaves areas around the compound perimeter available for landscape improvements and new planting, with the dual purpose of softening the visual impact of the proposals, whilst simultaneously providing significant net gains in biodiversity. The proposed Landscape Strategy (RPS drawing no. 100 Rev D) is set out in Figure 9 below.



Figure 9: Landscape Strategy

5.6.16 The nature of the BESS development is such that opportunities for landscape enhancement arise around the perimeter of proposed development, rather than within it. The Landscape Strategy proposes the introduction of extensive new native tree planting to the east, to supplement the existing woodland beyond the site boundary, in the form of two new woodland copses as well as interspersed individual trees. Further new tree planting will be introduced to the south and north of the main compound, and along the southern boundary of main access track from Fodolydd Lane. The tree planting will be set within extensive new wild flower meadow, to be established around the full perimeter of the BESS compound and along side the access track. A length of new native hedgerow will be established to the north of the site, which will include new hedgerow trees. Existing gaps in the mature hedgerow to the west will be reinforced.

Community safety

5.6.17 The proposals will provide a substantial source of stored renewable energy directly into the grid at times of high demand and low or intermittent supply. There are clear and substantial benefits presented by the development, primarily through the opportunity to provide a renewable source of clean energy.

5.6.18 The operation of the BESS is not expected to present any risks in terms of hazardous materials, pollution, emissions, or any other operational hazards as set out within the submitted Outline Battery Safety Management Plan (OBMSP). The site itself is secured by 2.5m high weld mesh perimeter fencing to the east, and 4m high acoustic fencing to the north, east and south, with pole mounted CCTV surveying the site. The Proposed Development will therefore be secure and safe from an operational perspective, and will provide substantial benefits to communities through the storage of clean energy, to ensure security of supply.

Decommissioning

5.6.19 The Proposed Development has been designed with an expected operational life of 40 years. At the end of the operational period, it would be decommissioned, and the storage units

dismantled and removed. Any alternative to this action would require a further consent from the Council in accordance with the relevant legislation at the time of any such application.

Planning Policy

5.6.20 Compliance of the Proposed Development with planning policy is dealt with in the following sections of this Statement.

6 PLANNING POLICY CONTEXT

6.1 Introduction

6.1.1 This chapter sets out the national planning policy context, the development plan policies and other material considerations, which are applicable to the determination of this application.

6.2 National Planning Policy

Future Wales: The National Plan 2040

6.2.1 Future Wales forms part of the development plan for the purposes of decision-making in Wales. It is a plan that sets out a strategy for addressing key national priorities through the planning system, which includes achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. Future Wales recognises the challenges climate change poses and the potential significant impacts on the wellbeing of both current and future generations. The plan highlights that increasing temperatures and extreme weather events caused by climate change are putting pressure on infrastructure and the built environment, which all contribute to social and economic resilience. Future Wales:

- Supports a low carbon economy and the decarbonisation of industry, and the growth of sustainable and renewable energy; and
- Supports infrastructure development, including transport, energy, and digital communications.

6.2.2 Policy 17 of Future Wales relates to 'renewable and low carbon energy and associated infrastructure'. Policy 17 confirms that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs, and that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet

Wales' international commitments and target to generate 70% of consumed electricity by renewable means by 2030, rising to 100% by 2035, in order to combat the climate emergency.

- 6.2.3 Future Wales (Page 118) also notes that it is vital for North of Wales to play its role in decarbonising society and supporting the realisation of renewable energy, stating that there is strong potential for wind, marine and solar energy generation, and Strategic and Local Development Plans should provide a framework for generation and associated infrastructure. Such infrastructure includes the likes of battery storage projects, which are an essential component for the storage and distribution of renewable energy. Welsh Government also wishes to see energy generation, storage and management play a role in supporting the regional economy in the North.

Planning Policy Wales (Edition 12)

- 6.2.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government and is a material planning consideration in the determination of planning applications. Paragraph 3.30 (Climate Change, Decarbonisation, and the Sustainable Management of Natural Resources) of PPW confirms that the Welsh Government declared a climate emergency in 2019, in order to co-ordinate action nationally and locally to help combat the threats of climate change. It further states that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.
- 6.2.5 To support the theme of '*Productive and Enterprising Places*', as set out in PPW (Page 74), one of the key issues identified to address includes embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels and moving towards local, decentralised renewable energy systems, the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks. PPW (Page 76) states that this will be addressed by encouraging policies and proposals which promote low carbon developments and sites for renewable energy, manufacturing, research, and development close to areas of deployment of renewable energy.

6.2.6 Paragraph 5.7.1 of PPW sets out that low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power. This paragraph further emphasises that the future energy supply mix will depend on a range of established and emerging low carbon technologies.

6.2.7 Paragraph 5.7.6 states that the planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. Paragraph 5.7.7 presents that the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change. The planning system should:

- Integrate development with the provision of additional electricity grid network infrastructure;
- Optimise energy storage;
- Facilitate the integration of sustainable building design principles in new development;
- Optimise the location of new developments to allow for efficient use of resources;
- Maximise renewable and low carbon energy generation;
- Maximise the use of local energy sources, such as heat networks;
- Minimise the carbon impact of other energy generation; and
- Move away from the extraction of energy minerals, the burning of which is carbon intensive.

6.2.8 Paragraph 5.7.12 makes clear the importance that Welsh Government places on the role of energy storage, stating: *“Energy storage has an important part to play in managing the transition to a low carbon economy. The growth in energy generation from renewable sources requires the management of the resultant intermittency in supply, and energy storage can*

help balance supply and demand. Proposals for new storage facilities should be supported wherever possible.”

- 6.2.9 Paragraph 5.7.14 considers targets for renewable energy. It sets out that one of these targets is for ‘Wales to generate 70% of its electricity consumption from renewable energy by 2030.
- 6.2.10 Paragraph 3.44 sets out national policy for sustainable open countryside development, stating that *“where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances.”*
- 6.2.11 Paragraph 3.60 sets out national policy for development in the Open Countryside, stating that *“development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation.”*
- 6.2.12 Chapter 6 of PPW was updated with immediate effect on 18th October 2023 following a consultation exercise in Spring 2023 which sought responses on the issues of green infrastructure, net benefit for biodiversity, the production afforded to Sites of Special Scientific Interest and trees and woodland. In response to comments received, the main changes to policy which are reflected in Chapter 6, PPW, include:
- Green Infrastructure: there is a stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.
 - Net Benefit for Biodiversity and the Step-wise Approach: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise

approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A simplified diagram of the policy approach has been developed (which will be further refined in the consolidated version of PPW12). The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.

- Protection for Sites of Special Scientific Interest: the approach to the protection of SSSIs is strengthened, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan.
- Trees and Woodlands: there is closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.

Technical Advice Notes

6.2.13 Technical Advice Notes (TANs) are a material consideration in the determination of planning applications, where relevant, and provide detailed planning advice that supplements PPW and other Welsh Government guidance, to provide the national planning policy framework for Wales. The following TANs are potentially of relevance to the Proposed Development:

- Technical Advice Note 5: Nature Conservation & Planning
- Technical Advice Note 6: Planning for Sustainable Rural Communities
- Technical Advice Note 10: Tree Preservation Orders
- Technical Advice Note 11: Noise
- Technical Advice Note 12: Design

- Technical Advice Note 15: Development and Flood Risk
- Technical Advice Note 18: Transport
- Technical Advice Note 23: Economic Development
- Technical Advice Note 24: The Historic Environment

6.3 Local Planning Policy

Anglesey and Gwynedd Joint Local Development Plan (2017)

- 6.3.1 On 31 July 2017 Gwynedd and Isle of Anglesey County Council adopted a Joint Local Development Plan (JLDP). The JLDP forms part of the development plan for Gwynedd and Anglesey Local Planning Authority areas, in addition to Future Wales, and is the basis for decisions on land use planning in this combined area (excluding the Snowdonia National Park).
- 6.3.2 The JLDP Interactive Proposals Map for Gwynedd confirms the site is outside the defined development limits of any settlement, but does not sit within a specified policy designation, including Special Landscape Areas or Green Wedge. However, the site is within the Dinorwig Landscape of Outstanding Historical Interest as identified by CADW, in addition to being within the open countryside.
- 6.3.3 JDLP policies considered relevant to this proposal are summarised below:
- **Policy PS 1: The Welsh language and Welsh culture** – Gwynedd will promote and support the use of the Welsh language and requires a Welsh Language Statement for proposals meeting certain thresholds. Proposals that cause significant harm to the character and language balance of a community will be refused.
 - **Policy PS 4: Sustainable transport, development and accessibility** – This policy seeks to locate development to minimise the need for travel.
 - **Strategic Policy PS5: Sustainable Development** – Development should reduce the effect on local resources, avoiding pollution and incorporating sustainable building

principles in order to contribute to energy conservation and efficiency; using renewable energy; reducing / recycling waste; using materials from sustainable sources; and protecting soil quality;

- **Strategic Policy PS6: Alleviating and Adapting to the Effects of Climate Change** - In order to alleviate the effects of climate change, proposals will only be permitted where it is demonstrated that they have fully taken account of and responded to, amongst other things, reducing energy demand.
- **Policy PCYFF 1: Development Boundaries** – This policy identifies relevant boundaries, Outside these boundaries, development will be resisted unless it is in accordance with specific plan policies or national planning policies or that the proposal demonstrates that its location in the countryside is essential.
- **Policy PCYFF 3: Design and Shaping Place** – All proposals will be expected to demonstrate high quality design. The policy sets out criteria for compliance.
- **Policy PCYFF 4: Design and Landscaping** – proposals must show adequate landscaping or they will be refused. The policy sets out criteria for compliance with the policy.
- **Policy PCYFF 5: Carbon Management** – Proposals must demonstrate how the contribution from renewable energy is maximised. The policy justification states that developers are encouraged to explore all aspects of the Plan area's capacity to contribute to reducing national carbon emissions within the energy sector.
- **Policy TRA 2: Parking Standards** – This policy sets out the Council's parking requirements for all proposals.
- **Policy TRA 4: Managing Transport Impacts** – This policy seeks to prevent unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes.
- **Strategic Policy PS 1: Welsh Language and Culture** – This policy will refuse proposals which would cause significant harm to the character and language balance of a

community that cannot be avoided or suitably mitigated by appropriate planning mechanisms.

- **Strategic Policy PS 7: Renewable Energy Technology** – The preamble to this policy sets out the potential capacity for renewable electricity generation in the Plan area, based on the outcome of renewable energy capacity studies undertaken in 2012 and 2016. At paragraph 6.2.21 concludes, on the basis of the potential capacity identified, that *“the Plan therefore aims to facilitate renewable energy development to address 2,226.7 (GWh) of electricity potential being 271% of the electricity needs ... of the Plan area by 2026”*. 6.2.22 goes on to state that *“All the resources and opportunities were considered together in order to gain an understanding of the renewable energy potential in the two counties. All in all Policy PS Policy A 1 Policy A 2 Policy A as well Policy P 5 provide a framework to promote the use of renewable energy or low carbon technology as part of individual developments or through provision of standalone equipment.”*
- **Policy ISA 1: Infrastructure Provision** - Proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner.
- **Policy ADN1 (On-shore Wind Energy) and Policy ADN2 (PV Solar Energy)** – These policies set out parameters for each respective renewable energy development type. The plan is permissive of renewable energy development subject to policy caveats, and is seeking to increase output over the plan period.
- **Policy ADN3: Other Renewable Energy and Low Carbon Technologies** – This policy sets out criteria for the delivery of schemes that contribute to a low carbon future. It is a permissive policy that supports such development proposals provided the criteria is satisfied. The criteria relate to such matters as landscape, heritage, ecology, natural resources, neighbouring uses and water quality.
- **Strategic Policy PS 19: Conserving and Where Appropriate Enhancing the Natural Environment** - The Councils will manage development so as to conserve and where appropriate enhance the Plan area’s distinctive natural environment, countryside and coastline, and proposals that have a significant adverse effect on them will be refused

unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protection for that site and area in question.

- **Policy PS 20: Preserving and Where Appropriate Enhancing Heritage Assets** – This policy is permissive of development provided, where relevant, criteria for the preservation of historic assets are met.
- **AT 1: Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens** – Proposals affecting any of these designations or their settings must have regard to relevant supplementary guidance, plans and registers.
- **AMG 5: Local Biodiversity Conservation** - Proposals must protect and where appropriate enhance biodiversity that has been identified as being important to the local area.

Relevant Supplementary Guidance

6.3.4 The Supplementary Planning Guidance (CCA) 'Maintaining and Creating Distinctive and Sustainable Communities' (adopted July 2019) sets out guidance on how considerations for the Welsh language are expected to be incorporated in all relevant developments.

6.3.5 Gwynedd Council and The Isle of Anglesey County Council ceased their joint working agreement on planning policy matters on 31 March 2023. Consequently, the Gwynedd Planning Policy Service has been established, which will take charge of preparing a new Local Development Plan (LDP) for the Gwynedd Local Planning Authority area only (which is the area of Gwynedd located outside the Eryri National Park). The new LDP will cover a period between 2024 and 2039. The Anglesey and Gwynedd Joint Local Development Plan continues to provide the local policy framework for decisions on planning applications, until the Gwynedd Local Development Plan is adopted.

The Well – being of Future Generations (Wales) Act 2015

6.3.6 In addition to the policy provisions outlined above, under the Well – being of Future Generations (Wales) Act 2015, all public bodies in Wales have a duty to secure sustainable

development by improving the economic, social, environmental and cultural well – being of Wales to achieve the 7 wellbeing goals. All planning applications in Wales need to demonstrate how they align with these wellbeing goals:

- A Prosperous Wales.
- A Resilient Wales.
- A More Equal Wales.
- A Healthier Wales.
- A Wales of Cohesive Communities.
- A Wales of Vibrant Culture and Thriving Welsh Language.
- A Globally Responsive Wales.

6.3.7 One of the wellbeing goals set in the Act is for a *globally responsible Wales*. Statutory guidance on the Act (Shared Purpose: Shared Future 1: Core Guidance) explains that action on climate change benefits both people and communities in Wales, whilst also contributing to the wider global effort to tackle the causes of climate change and reduce its effects.

6.3.8 Key matters highlighted in the guidance for public bodies to focus attention are decarbonisation (including use of clean energy) and sustainable consumption and production.

Other Material Considerations

The Gwynedd Landscape Strategy (2012)

6.3.9 The Gwynedd Landscape Strategy (2012) locates the site within the Caernarfon - Coast & Plateau Landscape Character Area. The strategy notes that the area displays a complex mix of historic landscapes of different characters and periods, dominated by 19th century estate farmland with valued areas of parkland remaining. Interspersed amongst the estatelands are prehistoric remains including ancient hut circles and hillforts.

7 PLANNING ASSESSMENT

7.1 Introduction

7.1.1 This section assesses the Proposed Development against the adopted planning policy framework as identified in the preceding chapter.

7.2 Principle of Development

7.2.1 Local and national planning policies support the principle of renewable energy development and its infrastructure.

7.2.2 At a local level, adopted Policy ADN 3 of the JLDP supports the principle of renewable energy and related developments subject to considerations. This chapter fully assesses the proposals against all environmental policies applicable to the site. The findings of this assessment confirm that there are no environmental considerations that represent a fundamental constraint to the Proposed Development, subject to the inclusion of any required mitigation.

7.2.3 The site is located within open countryside as identified by the adopted JLDP (Policy ISA 1) and the policy is supportive of the provision of improvements to existing infrastructure.

7.2.4 Policy PCYFF 1 (Development Boundaries) of the JLDP states that outside urban boundaries, development will be resisted unless it is in accordance with specific plan policies or national planning policies or that the proposal demonstrates that its location in the countryside is essential. The proposal is logically located adjacent to an existing, strategically important substation facility, which it will draw energy from and export it back into the grid when needed; and is already an acceptable use as per ISA 1 and therefore policy compliant. It would be unsustainable and unviable to locate such a facility in an urban area, unless the substation it was connecting to was also within the urban area. In this case, Pentir Substation is within the open countryside, therefore the development necessitates an open countryside location.

- 7.2.5 Strategic Policy PS5 (Sustainable Development) states that development should reduce the effect on local resources, avoiding pollution and incorporating sustainable building principles in order to contribute to energy conservation and efficiency; using renewable energy; reducing / recycling waste; using materials from sustainable sources; and protecting soil quality. This scheme will form a fundamental part of the renewable energy network, ensuring energy efficiency and security, and is therefore policy compliant.
- 7.2.6 Policy ISA 1 (Infrastructure Provision) states that permission will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. There is a confirmed need for increasing renewable energy generation in Wales, as per the policy sections 1 and 6 of this Statement. This proposal will contribute towards delivering this need and will be grid connected in 2027. The proposal therefore complies with the requirements of ISA 1.
- 7.2.7 Future Wales and PPW both strongly support the expansion of Wales's renewable energy network as well as recognising the need for facilities such as that proposed, to help facilitate the transition towards net zero.
- 7.2.8 Policy 21 of Future Wales acknowledges that it is vital that North Wales plays its role in decarbonising society and supports the realisation of renewable energy. PPW recognises that one of the key issues identified to address includes embracing the challenge of decarbonising our energy and transport sectors, which includes the increased use of energy storage to balance supply and demand and the challenge this creates on our distribution networks (paragraph 5.7.12).
- 7.2.9 Paragraph 3.44 of PPW states that certain forms of development, including renewable and low carbon energy generation, may be appropriate. PPW also notes that the identification of sites within open countryside must only be considered in exceptional circumstances and that the search process to identify suitable development land must be undertaken in a manner that fully complies with the requirements of national planning policy. Paragraph 3.60 states that

new development in the Open Countryside is acceptable provided it is of a scale and design that respects the character of the surrounding area.

7.2.10 Considering the above, a robust site selection process was undertaken to identify the optimum location for the Proposed Development. Given the need for energy storage to be located as close as possible to primary substations, in order to avoid energy losses through long sections of cabling, the priority search area was land immediately adjacent to Pentir Substation. Any available sites should be unstrained in access and environmental terms, or any constraints should be capable of being mitigated. A further priority of the applicant is the ability to achieve net gains in biodiversity on site.

7.2.11 The site selected for development performs excellently in terms of impacts on residential amenity, landscape and visual impact, ecological impacts, flood risk and loss of agricultural land. It is adjacent to the Pentir Substation and already benefits from an existing access point, making it a highly logical location for the Proposed Development. There are no other planning, heritage or land-based constraints restricting this development. As such, there are no other sites in the locality, which are known to be available, that would be better suited for the proposal.

7.2.12 Considering the above, the principle of the BESS development on this site is therefore considered to be accepted in accordance with national and local planning policy, and this is consistent with the views of Gwynedd Council officers expressed in their pre-application response dated 8 January 2024.

7.3 The Welsh Language

7.3.1 Local Plan Strategic Policy PS 1 (Welsh Language and Culture) will refuse proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms. This policy is supported by Supplementary Planning Guidance (CCA) 'Maintaining and Creating Distinctive and Sustainable Communities' (adopted July 2019)

7.3.2 In accordance with the Planning (Wales) Act 2015 it is a duty when making a decision on a planning application to take into account the Welsh language, where it is relevant to that application. This is further supported by paragraphs 3.25 – 3.29 of Planning Policy Wales (Edition 11, 2021) together with Technical Advice Note 20.

7.3.3 The pre-application response issued by the Council on 8 January 2024 states that *“the guidance contained within Appendix 5 of the SPG states that all retail, commercial or industrial developments where it is not necessary to submit a Welsh language Statement/Assessment should show how consideration has been given to the language. Therefore, it is considered appropriate to receive further information as part of any planning application in terms of how consideration has been given to the Welsh language when drawing up the proposal. Methods of presenting the information can be in the form of a Planning Statement.”*

7.3.4 Therefore, the Screening Process as set out in Table 2 of the SPG results in a requirement for justification in this Planning Statement only. The proposal has a low impact on the Welsh Language given its use, location and low number of proposed employees. However, Table A (Schedule of examples of possible activities) of Appendix 6 of the SPG sets out examples of possible initiatives for mitigating the linguistic effects of the development, and the applicant is happy to implement the following, to be secured via planning condition:

- Name the development by taking into account local linguistic heritage.
- Provide bilingual signage in public places.
- Potential use of a community benefit fund for supporting and funding community facilities/ groups and cultural and language initiatives/projects in the local area should the community wish it.
- Funding language and awareness courses for members of staff that maintain the operational site.
- Adopting a voluntary language policy/plan that explains how the employer will ensure that the Welsh language is treated equally.

7.3.5 On this basis, the scheme conforms with requirements of LDP policy PS 1, the 'Maintaining and Creating Distinctive and Sustainable Communities SPG and Planning Policy Wales.

7.4 Agricultural Land

7.4.1 The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland. The ALC system classifies land into five grades, with 1 being the best and 5 being the worst and Grade 3 subdivided into Subgrades 3a and 3b. Grades 1 – 3a are classed as best and most versatile (BMV).

7.4.2 The Predictive Agricultural Land Classification Map for Wales classifies the proposed site for the BESS itself as Grade 3b or Grade 5 lower quality land. This accounts for approximately 1.9 ha of the site, which is circa 74% of the overall site area. However, the proposed access track from Fodolydd Lane to the BESS development is on provisional Grade 3a land. A small area of the north west corner of the main field parcel is also Grade 3a. This accounts for approx. 0.22 ha of the site and 8.5% of the overall site area. The remainder of the site is classified as non-agricultural. The vast majority of the site therefore consists of lower-quality agricultural land which is currently used for grazing.

7.4.3 The proposal will, therefore, result in the loss of a small amount of BMV agricultural land which will be needed to provide access to the lower grade land for it to be developed. However, as highlighted above (paragraph 7.2.10 and 7.2.11), the Proposed Development has specific locational needs adjacent to the strategically important Pentir Substation, and the agricultural classification map confirms that there is an abundance of better-quality land available in the locality. The formation of the access track is also confined to a thin strip of land adjacent to the southern boundary of the field parcel in question, meaning that there is very little, if any impact on the ongoing practical use of the field for agricultural purposes.

7.4.4 Policy PS 5 of the LDP aims to safeguard the “*best and most versatile agricultural land*”. The Council, during pre-application discussions, confirmed they are guided by national planning

Policy (PPW) which states that such land should only be developed if there is “*an overriding need for the development*”.

- 7.4.5 As set out previously, there is an acute need for energy diversification in Wales and this aim is a cornerstone of national policy. It is essential that grid infrastructure is updated to enable the storage of energy as a result of the intermittent nature of renewable energy generation, which will make up 70% of all energy generated by 2030, and 100% by 2035. The need for related energy storage infrastructure is highlighted in PPW (paragraph 5.7.12), which states that such proposals should be supported where possible.
- 7.4.6 The site comprises predominantly low-quality agricultural land in a highly logical location for its purpose, adjacent to existing National Grid infrastructure where it is needed, and an agreement in principle for a grid connection. The loss of BMV land is minimal in this case and does not prejudice the use of the majority of the field parcel in question for ongoing agricultural use. The use of the land is also essential for gaining access to the BESS development.
- 7.4.7 Given the above, it is considered that the considerable benefits of the scheme outweigh the very minimal harm through loss of a small area BMV land. Therefore, the necessary justification and mitigating circumstances exist in this case to comply with local and national policy relating to the protection of BMV land.

7.5 Residential Amenity

- 7.5.1 Policy PCYFF 3 (Design and Place Shaping) requires developments to complement and enhance the character and appearance of a site, in terms of siting, appearance, scale, height and massing. The nearest residential properties to the Proposed Development are approximately 197m to the west on Fodolydd Lane.
- 7.5.2 The separation distance between the Proposed Development and the nearest residential properties, and the related lack of intervisibility, is such that it is considered there is little to no potential for the Proposed Development to appear intrusive or overbearing within the visual

outlook from those properties. The submitted LVIA confirms that with substantial intervening vegetation and the low-lying nature of the Proposed Development, it is considered that no residential properties have the potential to experience a degree of harm to make considering private views a public interest matter.

- 7.5.3 The submitted Noise Impact Assessment confirms that the Proposed Development will give rise to rating sound levels that do not exceed the measured background sound levels in the area during the day, thus giving rise to a 'low impact'. Sound levels at night have the potential to exceed the measured background sound level, thus giving rise to a '*low to potentially adverse impact*'. The latter is achieved through the use of a 4m acoustic fence on the northern, western and southern boundaries of the BESS compound.
- 7.5.4 The Noise Impact Assessment therefore confirms that any potential impact on nearby residential receptors will not result in significant harm, through the use of appropriate mitigation. The Proposed Development is therefore in accordance with adopted Policy and 3 (criterion 3) of the JLDP.

7.6 Highways and Transport

- 7.6.1 Policy TRA 4 (Managing Transport Impacts) seeks to prevent unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes.
- 7.6.2 The nature of the development is such that there is very little traffic movement associated the operational phase of the development, with only a small number of maintenance vehicles periodically accessing the site no more than 2-3 times per month. The submitted Transport Statement confirms that the proposal is well placed to take advantage of the surrounding transport network including good connections to the A55 National Wales Express Way.
- 7.6.3 The impacts of the proposals are likely to be more evident during the construction phase. To control any potential harmful impacts as a result of traffic generated by the construction of the

development an outlined Construction Traffic Management Plan (CTMP) has been prepared and accompanies the application.

- 7.6.4 The CTMP confirms that the construction works during the enabling and civil works could require up to 10 HGV deliveries (20 movements) per day, including concrete deliveries. However, this number of deliveries is unlikely to be required every day during this period.
- 7.6.5 The delivery of the BESS and associated equipment will require around 10 – 15 deliveries (20 – 30 movements) could be required over a period of 3 – 4 days. Significantly less deliveries would then occur on a daily basis over the remaining duration of delivery phase.
- 7.6.6 During the latter phases of the construction, which would involve connection, commissioning and demobilisation followed by landscaping work, there would be limited HGV movements. The works required would be carried out by individual personnel doing electrical and commissioning work over a period of 3 – 4 months.
- 7.6.7 Careful consideration of the impacts on the highway network have been considered in line with TAN 18: Transport, adopted Policy TRA 4 of the JLDP. The operational development will have a negligible impact on the local highway network. During construction there will be traffic movements associated with on-site activities; however, the associated impacts will be limited in terms of highway capacity.

7.7 Ecology and Biodiversity

- 7.7.1 Policy AMG 5 (Local Biodiversity Conservation) requires that proposals must protect and where appropriate enhance biodiversity that has been identified as being important to the local area.
- 7.7.2 The developable area within the application site boundary has been found to comprise negligible value habitats, with local value habitats proposed for enhancements and buffering, as set out within the supporting Ecology Report.
- 7.7.3 The site supports foraging bats and an assemblage of breeding birds of value at the local scale. The scheme will result in the loss of 1.28 ha of modified/improved grassland but will retain and enhance the more valuable habitats on site.
- 7.7.4 The proposals will also deliver a significant net gains in biodiversity, through a range of preventative and enhancements measures, in accordance with the step-wise approach advocated in PPW, including the following recommendations of the Ecological Assessment:
- Supplementary planting of native hedgerows to enhance retained habitats.
 - Enhancement of existing woodland through additional native shrub planting to create a strengthened understorey and creation of a wider line of additional trees with additional tree species planting.
 - Extensive replacement tree planting, with 34 individual trees and two large sections of mix woodland planting.
 - Installation of bird boxes throughout the site.
 - Enhancement of reptile habitat through native species planting and inclusion of reptile refugia in the scheme design.
 - Boundary vegetation to remain unlit, dark areas retained and bat boxes to be installed on retained trees.

- 7.7.5 The submitted Ecological Appraisal confirms that these improvements represent:
- 43.98% gain in habitat units
 - 97.45% gain in hedgerow units
- 7.7.6 In accordance with the requirements of Chapter 6 of PPW, a Green Infrastructure Statement has been prepared to support the application. This statement identifies that as a result of the ecological measures embedded within the proposed scheme, there will be a demonstrable net benefit for biodiversity. The site has been identified as being of relatively low value ecologically, with immediate impacts adequately mitigated on-site and net gain also being achieved through on-site enhancement measures.
- 7.7.7 The formal enhancements proposed ensure that the Proposed Development is aligned with Chapter 6 of PPW, Technical Advice Note 5: Nature Conservation & Planning and Strategic Policy PS 19 of the JDLP.

7.8 Trees and Landscape

- 7.8.1 Local Plan Strategic Policies PS 19 and AMG 5 require the protection, retention or enhancement of trees, hedgerows or woodland of visual, ecological or amenity value. Policy PCYFF 4 (Design and Landscaping) requires robust justification for the removal of trees and the planting of native trees, unencumbered by the Proposed Development.
- 7.8.2 An Arboricultural Impact Assessment has been submitted with the application to demonstrate that the Proposed Development intends to retain as many existing trees as possible. However, to facilitate the proposal one category B group (G13), 4 individual category C trees (T18-21), one category U tree (T17) and three small sections of hedgerow (S13, S21, S23) will be removed. 34 individual trees and two large sections of mixed woodland will be planted to mitigate this loss. Further detail is provided within the submitted AIA.
- 7.8.3 A LVIA and landscape strategy (Plan ref: Landscape Strategy_100_A) accompanies the application and confirms that additional planting would be concentrated to the westernmost

and northern boundary of the site. This would include gapping up and reinforcing existing hedgerows along these boundaries. Particularly at field entrances and accesses, provided these are not required as part of the proposal.

7.8.4 Tree planting is proposed along the eastern and southern boundaries, along with additional hedgerow trees along the western and northern boundary.

7.8.5 Other areas will be retained as existing grassland and suitably managed to increase the overall biodiversity within the site. Grassland habitat creation and management will be carried out in accordance with any ecological recommendations with a view to increasing the biodiversity value.

7.8.6 New planting would be of native species appropriate to the location and local landscape. Long term management and establishment of existing / proposed hedgerow planting should ensure a suitable height, up to 3 m, is maintained to further screen potential views of the Proposed Development.

7.9 Historic Environment

7.9.1 JLDP Policy PS 20 (Preserving and Where Appropriate Enhancing Heritage Assets) is permissive of development provided, where relevant, criteria for the preservation of historic assets are met.

7.9.2 There are no heritage assets within the site or directly adjacent to it.

7.9.3 Within a 3km radius of the study site there are 10 Scheduled Monuments, 103 listed buildings, 1 Registered Park and Garden and 3 Conservation Areas. No other asset types are present within 3km of the study site. The nearest designated heritage asset to the study site is 660m to the north.

- 7.9.4 Following map analysis and ground truthing, and observing the views from within the study site, no designated archaeological assets have been identified that could be subject to an impact from the development.
- 7.9.5 The closest designated asset to the site is the Gors y Brithdir Enclosed Hut Group and Ancient Fields (Scheduled Monument CN203), approximately 660m to the north. There are two hut circles within the enclosure, although the walls are just low grassy banks; other irregularities may be other features or possibly a third hut. A length of field wall 55 m long is included in the scheduled area. It runs from the enclosure wall in a northeast direction, and is probably of the same date as the enclosed settlement, although a more recent field wall has been constructed on top of the earlier wall.
- 7.9.6 The Gors y Brithdir Enclosed Hut Group & Ancient Fields (Scheduled Monument CN203) is also located 1km to the north and several Listed Buildings are located at Ty'n Llwyn Farm which are located 850m to the south-east. The local topography and existing vegetation, as well as the Pentir substation, prevent any intervisibility between the site and these assets.
- 7.9.7 The Archaeological Desk Based Assessment confirms that the archaeological potential of the study site is limited to the possible remains of a conjectured Roman road to the immediate west of the proposed access road.
- 7.9.8 There is a low potential for finds or features from any other period to be present anywhere in the site. Any archaeological remains present within the site are unlikely to be of more than low/local significance.
- 7.9.9 The potential development impacts on the historic environment consist of direct impacts on buried archaeological remains within the site and impacts on the settings of designated archaeological heritage assets beyond the study site but within 3km of its boundaries.
- 7.9.10 On this basis, the scheme complies with the requirements of JDLP Policies PS 20 and AT 1 and is acceptable in planning terms.

7.10 Flood Risk and Drainage

- 7.10.1 The site is not in a flood risk area and is not affected by any flooding from the sea or from rivers; although there are small areas of the site potentially affected by surface water flooding as a result of an existing drain which runs through the site.
- 7.10.2 When considering NRW's New 'Flood Map for Planning', this also confirms that the site falls within Flood Zone 1 and is therefore at low risk of flooding. A surface water management strategy has been produced to incorporate appropriate management techniques that will mitigate potential increase in runoff from the Proposed Development.
- 7.10.3 The proposals are therefore in accordance with the guidance set out within TAN15.

7.11 Design

- 7.11.1 JLDP Policy PCYFF 3 (Design and Shaping Place) requires all proposals to demonstrate high quality design. Policy PCYFF 4 (Design and Landscaping) states that proposals must show adequate landscaping.
- 7.11.2 As set out in the Design and Access section (Section 5), the design has evolved throughout the initial stages of consultation and in response to the findings of technical studies.
- 7.11.3 The layout of the scheme has been sited and designed to preserve the visual openness of the surrounding countryside. A hedgerow enhancement scheme and landscape buffer are proposed to improve upon what is already a well screened site, as set out in the submitted Landscape Strategy Plan.
- 7.11.4 In addition to this buffer, the proposals are set back from the application boundary to further reduce the visual impacts of the proposals.

- 7.11.5 The individual structures that make up the BESS development are necessarily functional and industrial in their appearance. There is a need for equipment to be structurally robust, with necessary cooling features. The structures also need to be appropriately spaced to accord with applicable guidance and to provide access. The siting of the Proposed Development and the extent of additional new landscaping, however, will ensure that it is not highly visible from any sensitive viewpoints.
- 7.11.6 The final colour finish and materials of the development, including equipment and boundary treatments, are not currently fixed. This will be dependent on manufacturer specification at the time of procurement, and the preference of the local planning authority. It is therefore proposed that final finishes are subject of a suitably worded planning condition.
- 7.11.7 On the basis of the above considerations, the scheme is considered to comply with Policies PCYFF 3 and PCYFF 4 of the JDLP.

7.12 Access

- 7.12.1 JDLP Policy TRA 2 (Parking Standards) sets out the Council's parking requirements for all proposals. Policy TRA 4 (Managing Transport Impacts) seeks to prevent unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes.
- 7.12.2 The Proposed Development introduces a new access road to the west of the site. This is required to enable the primary access to the site. The CTMP submitted to support the application provide details on how traffic will be managed throughout the construction period.
- 7.12.3 Outside of the construction phase there will be limited traffic movements associated with the operation of the site, other than servicing and maintenance vehicles, which will park within the main compound area. The limited scale of vehicles accessing the site means that no dedicated car parking is required.

7.12.4 The site will be secured and will be enclosed by a fence and will not be accessible to the public, and there are no PRow that are affected by the Proposed Development.

7.12.5 The Proposed Development is therefore considered to accord with TRA 2 and TRA 4 of the JDLP.

7.13 Safety

7.13.1 To support the application, an Outline Battery Safety Management Plan (OBSMP) has been prepared.

7.13.2 The proposed BESS will be designed to meet relevant industry standards and legal requirements which contain specific safety requirements.

7.13.3 The OBSMP identifies a range of criteria, based on National Fire Chief Council (NFCC) requirements, to assess the proposed BESS against. This assessment identifies that the ESS's proposed design and layout is compliant with all criteria it was assessed against.

7.13.4 Using existing knowledge of BESS capability, the OBSMP identifies current foreseeable risks associated with the proposed equipment. These risks will be actively managed throughout the life of the installation and added to, as necessary, as the proposals for the scheme develop.

7.13.5 It is recommended that the BESS safety management and criteria, as defined in the OSBMP, is adhered to throughout the BESS project lifecycle to ensure that safety management is developed as the programme progresses and remains valid through the life of the BESS capability.

7.13.6 The North Wales Fire and Rescue Service was engaged with prior to submission to discuss the proposal in relation to fire safety. Design amends were incorporated following a meeting on 19 October 2023 with the Service, including the introduction of a secondary emergency site access.

7.13.7 Considering the above, the proposals are considered to accord with Policies PS 5, ISA 1 and ADN 3 of the JDLP as, subject to the implementation of any requirements to align with the OBSMP, there will be no adverse impacts as a result of the Proposed Development on public safety.

8 SUMMARY AND CONCLUSIONS

8.1 Summary

8.1.1 This PDAS supports a full planning application on behalf of Lightsource bp for the following summary description of the proposals:

Proposed Energy Storage, related access, infrastructure, ancillary equipment with a grid connection import and export capacity of 57MWac.

8.1.2 The Proposed Development has been assessed against the adopted development plan, national planning policy and guidance.

8.1.3 Future Wales is clear that decision-makers must give significant weight to the need in Wales to meet its international commitments, and its target of generating 70% of consumed electricity by renewable means by 2030. PPW also recognises that the increased use of energy storage to balance supply and demand will help address key issues of decarbonising our energy and transport sectors, and states that such proposals should be supported. At a local level, adopted and emerging policy also supports renewable energy and related development. Considering the support at a national and local policy level for energy storage development, alongside the robust justification for site's location, in accordance with the requirements of PPW, the principle of the BESS is considered acceptable.

8.1.4 The submitted Noise Impact Assessment demonstrates that the Proposed Development will not result in significant harm at the identified receptor locations, subject to the inclusion of the proposed mitigation. The submitted OBSMP also demonstrates that the operation of the Proposed Development should not give rise to unacceptable safety risks.

8.1.5 Careful consideration of the impacts on the highway network during the construction and operational phase have been considered and are confirmed to be in accordance with local and national planning policy.

- 8.1.6 The extensive landscape enhancements proposed will result in significant net gains in biodiversity and ensure that the Proposed Development is aligned with all relevant local and national planning policy.
- 8.1.7 From a landscape and visual perspective, any notable effects on landscape character and visual amenity as a result of the Proposed Development would be localised and would be reduced by proposed planting, which would provide increased filtering and screening of the Proposed Development overtime as planting matures. The works proposed have sought to minimise the visual impact both from nearby and distant viewpoints as a result of the Proposed Development. As such the proposals are in accordance with the aims of all relevant local and national planning policy.
- 8.1.8 In terms of impact on heritage assets, the impact calculated is considered to be negligible or minor, as identified by the Cultural Heritage Assessment.
- 8.1.9 The submitted Flood Consequence Assessment and Drainage Assessment demonstrates that the proposals do not increase the level of flood risk on the site or elsewhere and does not impact upon local water quality.

8.2 Conclusion

- 8.2.1 This PDAS has assessed the Proposed Development against the adopted development plan, national planning policy and guidance, and has regard to applicable material planning considerations. The Proposed Development is in accordance with the development plan and national planning policy, and in the absence of any material considerations that indicate otherwise, planning permission should be granted.

Appendix A Pre-Application Advice (18 December 2023)

Adran Amgylchedd / Environment Department

Cynllunio, Gwarchod y Cyhoedd, Trafnidiaeth & Chefn Gwlad
Planning, Public Protection, Transportation & Countryside

Gwasanaeth Cynllunio / Planning Service

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Gofynnwch am/Ask for: Aneurin Rhys Roberts

Shaun Gaffey

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18-12-2023

Annwyl Syr / Madam,

Dear Sir / Madam,

Rhif Ymholiad / Enquiry Number: Y23/0818

Dyddiad Cais / Case Date: 20-11-2023

Lleoliad / Location: Land At Pentir Substation, Pentir, Bangor, LL57 4ED

Manylion / Details: Cynllun Storio Ynni Arfaethedig, mynediad cysylltiedig, seilwaith, offer ategol gyda chynhwysedd mewnfario ac allfario cysylltiad grid o 57MW

Proposed Energy Storage, related access, infrastructure, ancillary equipment with a grid connection import and export capacity of 57MW

PRE-APPLICATION ADVICE SERVICE

I refer to your pre-application enquiry and the details submitted in respect of the above. The following advice is based on the information you have provided and is given in accordance with the Gwynedd Council guidance on pre-application advice.

1. Description of proposal

57MW capacity energy storage scheme, including associated access, infrastructure, ancillary equipment.

2. Relevant planning history of the site:

None

3. Planning constraints:

The site is outside any development boundary as defined by the [Gwynedd and Anglesey Joint Local Development Plan](#) (LDP) and is therefore considered to be in Open Countryside

The site is within the Dinorwig Landscape of Outstanding Historic Interest

The site is partly within Zone B as identified by the Flood Risk Map accompanying Technical Advice Note 15 "Development and Flood Risk"

The adjacent woodland to the east is a recognised "Regional Wildlife Site" and is on the Ancient Woodlands Inventory as a Plantation on Ancient Woodland Site"

The land is classified 3a and 3b in the predictive Agricultural Land Classifications Map for Wales

4. Appropriate links to other departments or organisations, in order to enable you to contact them directly before submitting a planning applications:

Sustainable Drainage Systems (SuDS)

As from 7 January 2019, Schedule 3 of the Flood and Water Management Act 2010 requires that all new developments with a constructional area of more than 100m², will require a sustainable drainage system (SuDS) to manage surface water. SuDS plans and details must be submitted within an application for approval by Gwynedd Council in their role as the SuDS Approval Body (SAB), **prior to the commencement of any construction work**. For further information and guidance regarding the submission and approval of SuDS applications please view the council's website via this direct link: [Gwynedd SAB](#) or calling 01286 679 501 / 679 355

Welsh Water - Welsh Water provides their own pre-planning advice service, details of which can be found via the following link [Pre-planning | Dŵr Cymru Welsh Water \(dwrcymru.com\)](#)

Natural Resources Wales - Natural Resources Wales provides their own pre-planning advice service, details of which can be found via the following link: [Natural Resources Wales / Our service to developers \(cyfoethnaturiolcymru.gov.uk\)](#)

5. *Relevant planning policies and guidelines:*

Welsh Government Policies

[Planning Policy Wales Edition 11, 2021](#)

Technical Advice Note 5 "Nature Conservation and Planning"

Technical Advice Note 15 "Development and Flood Risk"

Technical Advice Note 20 "Planning and the Welsh Language"

Technical Advice Note 23 "Economic Development"

Technical Advice Note 24 "The Historic Environment"

Gwynedd and Anglesey Joint Local Development Plan Policies

PS 1: The Welsh language and Welsh culture

PS 4: Sustainable transport, development and accessibility

PS 5: Sustainable Development

PS 6: Mitigate and adapt to the effects of climate change

PS 19 : Conserving and where appropriate enhancing the Natural Environment

PS 20 : Preserving and where appropriate enhancing Heritage Assets

ISA 1 : Infrastructure Provision

ADN 3 : Other renewable energy and low carbon technologies

TRA 2: Parking standards

TRA 4: Managing transport impacts

PCYFF 1 : Development Boundaries

PCYFF 2: Development Criteria

PCYFF 3: Design and Shaping Place

PCYFF 4 : Design and Landscaping

AT 1 : Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens

AMG 5 : Local Biodiversity Conservation

6. *Information on potential planning obligations:*

None.

7. *A written informal and unbiased summary of the opinion of the Case Officer.*

Every planning application must be considered on its own merits in the context of the relevant development plan and any other material considerations. The Gwynedd and Anglesey Joint Local Development Plan (LDP) has been adopted as the development plan for this area.

Policy PCYFF 1 of the LDP states:

"Outside the development boundaries development will be resisted unless it is in accordance with specific policies in this Plan or

national planning policies or that the proposal demonstrates that its location in the countryside is essential."

The policy acknowledges that some types of developments are necessary if the plan is to address the area's social, economic or environmental needs and the assessment below considers the proposal's compatibility with other elements of the LDP.

LDP Policy ISA 1 is generally supportive of proposals for utility services to improve infrastructure provision. More specific to this proposal, is Policy ADN 3 of the LDP which states (officer comment included in relation to each of the relevant policy criteria):

POLICY ADN 3: OTHER RENEWABLE ENERGY AND LOWCARBON TECHNOLOGIES

Proposals for renewable and low carbon energy technologies, other than wind or solar, which contribute a low carbon future will be permitted, provided that the proposal conforms to the following criteria:

Comment

It is noted that this proposal is not in itself a renewable energy proposal, rather which is intended as a resource forming part of a low-carbon energy network. As such, it is considered that this policy remains relevant to the proposal.

1. All impacts on landscape character, heritage assets and natural resources have been adequately mitigated, ensuring that the special qualities of all locally, nationally and internationally important landscape, biodiversity and heritage designations, including, where appropriate, their settings are conserved or enhanced;

Comment

Landscape Issues

This proposal would be located on a greenfield site in open countryside. The Gwynedd Landscape Strategy (2012) locates the site within the Caernarfon - Coast & Plateau Landscape Character Area. The strategy notes that the area displays a complex mix of historic landscapes of different characters and periods, dominated by 19th century estate farmland with valued areas of parkland remaining. Interspersed amongst the estatelands are prehistoric remains including ancient hut circles and hillforts.

All proposals for development and management should:

- Respect the nature of the pattern and the detail of the historic fabric of the landscape
- Ensure that direct and indirect impacts on both upstanding features and buried remains (known and unknown) are taken into account (this could include visual impacts upon the setting of historic landscapes, or disruption to the pattern and scale of these elements)

It is noted that it is intended to produce a Landscape and Visual Impact Assessment to support the planning application and it is agreed that such a document will be essential. Any assessment should include viewpoints from nearby publicly accessible locations along with higher ground to the south east e.g. Moel y Ci and Moel Rhiwen, and the Anglesey Area of Outstanding Natural Beauty.

It is also acknowledged that the location itself appears to be relatively well hidden by the existing landform and vegetation and that additional screen planting is intended. A detailed Landscaping Plan should be included with any planning application – this should include measures for biodiversity mitigation and enhancement (please see Biodiversity section below). Consideration should also be given to lessening the impact of the proposals by choosing an appropriate dark colour for the equipment to be installed and minimising the areas of hardstanding within the site.

Biodiversity

The initial views of Gwynedd's Biodiversity Unit were sought with regard to the information submitted and any potential requirements for the planning application. The Unit noted that, contrary to the information submitted regarding biodiversity, the site appears to be quite valuable from a biodiversity point of view. It would appear that the applicant's ecologist has used English legislation and planning policy in their assessment, however there is a significant distinction between the English and Welsh systems, particularly with regard to recent changes to Planning Policy Wales.

In this instance the term 'Modified grassland' has been used to describe the site and this is generally used by UKHAB software for what in Wales is normally referred to as 'improved grassland' (a vibrant green grass for pasture, very low biodiversity value) – this software is often used for producing biodiversity net gain calculations as per the English planning policy. The Biodiversity unit considers that this habitat is more valuable than made out in the information provided however this would need to be confirmed by a Preliminary Ecological Assessment as part of the planning application. Classifying a habitat as something with a lower value gives a very skewed metric calculation implying only minimal mitigation and enhancement is required.

By letter dated 11 October 2023 the Welsh Government announced changes to Planning Policy Wales (PPW) which will be included in the forthcoming revision to PPW. In particular, with reference to the revised PPW sections on maintaining and enhancing biodiversity, and the step-wise approach towards assessing the impacts of proposed development on habitats and species has been introduced. This includes that a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In this case it may also be appropriate to produce a green infrastructure design plan and/or ecological management plan depending on the ecologist's recommendations.

While this proposal itself is unlikely to have a significant impact on the adjacent wildlife site or any statutory designations locally, it is noted that it will be necessary to connect via cable to the National Grid Substation and, dependent upon the route to be taken, this may impact directly on the adjacent woodland which would require detailed assessment and mitigation.

In terms of protected species, a badger survey and report will need to be included with a planning application.

Heritage designations

The site is within a designated Landscape of Outstanding Historic Interest and that fact will need to be taken into account as part of any LVIA produced. It will also be necessary to acknowledge and appraise the impacts from any nearby heritage assets i.e Scheduled Ancient Monuments and Listed Buildings.

As noted in the Gwynedd Landscape Strategy, there are many unknown and buried historical features in this area and while it is noted that an initial appraisal indicates that the site has low potential for such features it is strongly recommended that Gwynedd Archaeological Planning Service be contacted in order to ascertain whether there is going to be a likely requirement to undertake a formal archaeological assessment as part of the planning application (planning@heneb.co.uk)

2. That the proposal does not have a significant unacceptable effect on visual amenities;

Please see comments above regarding Landscape.

3. That the proposal is mitigated to ensure that there aren't any significant unacceptable effects on sensitive uses located nearby;

Comment

A noise assessment will be an essential element in assessing the impacts upon nearby sensitive locations.

4. Where appropriate, that the proposal does not have a significant unacceptable effect on the quality and supply of water;

Comment

This will be the subject of assessment by the relevant statutory agencies.

Council maps indicate that a watercourse runs through to the proposed development site, and the proposals involve crossing this stream at two locations. Ordinary Watercourse Consent will be required for any works that may affect the flow of the stream and Gwynedd's Water and Environment Unit should be contacted for further advice on these matters (FCRMU@gwynedd.llyw.cymru). The developer is also advised to avoid installing / erecting any structures within 3m of the watercourse as this may prevent future maintenance.

5. Where appropriate, existing buildings or previously developed land is used;

Comment

The site is on agricultural land, partly 3a and mainly 3b grade, it is noted that Planning Policy Wales states that

*'.....in development plan policies and development management decisions **considerable weight** should be given to protecting such [BMV] land from development, because of its special importance. Land in grades 1, 2 and 3a should **only** be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.*

Information regarding the strategic significance of this site for the operation of the National Grid network will be essential in order to demonstrate an "overriding need" for the development. The locational requirement to be on this particular site should also be fully explained.

6. That the development does not have cumulative unacceptable effect with any prominent features in the landscape or townscape;

Comment

The cumulative visual impact of the existing National Grid Sub-station with this proposal will need to be fully assessed within any LVIA.

7. Where required, the equipment and associated infrastructure are removed from the site in accordance with a restoration and aftercare scheme submitted to and agreed by the Local Planning Authority.

Comment

It is likely that there will be a condition placed on any planning permission to ensure the satisfactory restoration of the site when the proposed use ceases.

Where necessary, proposals should be informed by the landscape and visual impact assessment.

Comment

See above

Other issues

Flood Risk Management

While the site is shown to be in Flood Zone 1 according to the Flood Map for Planning that accompanies the draft TAN 15 published in December 2021, this version of the TAN has not yet been formally adopted therefore (TAN) 15: Development and Flood Risk 2004 remains in place and is a material planning consideration. The site is located partly within Zone B on the Development Advice Map (DAM) as referred to by the Technical Advice Note (TAN) 15: Development and Flood Risk.

This proposal is considered to be a "Highly Vulnerable Development" (vulnerable industrial development e.g. power stations, chemical plants, incinerators). Highly Vulnerable Developments may be acceptable within zone B so long that it can be demonstrated that:

- There are acceptable consequences for nature of the use
- Occupiers are aware of the flood risk
- Escape/evacuation routes present
- Effective flood warning provided
- Flood emergency plans and procedures
- No increase in flooding elsewhere

It is strongly suggested that the advice of Natural Resources Wales (details above) is sought at an early stage to ascertain what further information, if any, may be required to ensure that there would be no unacceptable flood risks arising from this development.

Highways Issues

An initial consultation was undertaken with Gwynedd Council's Transportation Unit and they request that the applicant provides a Transport Statement as part of the full application to outline the potential impact upon the highway network. The Transport Statement should include an estimate for generated trips - and nature of vehicles - during the construction phase and operational phase of the site.

The application should also include a plan showing the visibility splay from the access point and detailing any works required to achieve the splay.

The Welsh Language

In accordance with the Planning (Wales) Act 2015 it is a duty when making a decision on a planning application to take into account the Welsh language, where it is relevant to that application. This is further supported by paragraphs 3.25 – 3.29 of Planning Policy Wales (Edition 11, 2021) together with Technical Advice Note 20.

The [Supplementary Planning Guidance \(CCA\) 'Maintaining and Creating Distinctive and Sustainable Communities' \(adopted July 2019\)](#) provides further guidance on how considerations for the Welsh language are expected to be incorporated in all relevant developments.

Excluding the developments that reach the thresholds for submitting a formal Statement/Assessment on the Impact of the Welsh Language as set out in Policy PS1, the guidance contained within Appendix 5 of the SPG states that all retail, commercial or industrial developments where it is not necessary to submit a Welsh language Statement/Assessment should show how consideration has been given to the language. Therefore it is considered appropriate to receive further information as part of any planning application in terms of how consideration has been given to the Welsh language when drawing up the proposal. Methods of presenting the information can be in the form of a Planning Statement, a Design and Access Statement or a Welsh Language Statement or a Welsh Language Impact Assessment

Access for all:

Policy PCYFF 3 requires that the layout and design of developments achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for disabled people. This should be considered during the early stages of planning a development and the detail should be shown clearly on the plans submitted as part of a planning application. Consideration should be given to levels and access both outside and around a development (including materials for hard standings) and within buildings. These considerations are also relevant for schemes that require Building Regulations consent.

Major development

Since August 2016 there has been a requirement in Wales for all proposed developments classified as "Major" to undergo a statutory 28 day Pre-Application Consultation and produce a Pre-Application Consultation Report for submission with the application. Applications relating to developments to be carried out on a site having an area of 1 hectare or more are considered major and as such the procedure described in

the document [on this link](#) should be followed prior to submitting any application.

Conclusions

This site is in "open countryside" where development must be strictly controlled however Policy ISA 1 is supportive of the provision of improvements to existing infrastructure and, considering the site's location adjacent to an existing strategic energy facility, the proposed use would appear to be generally consistent with its setting and is likely to be acceptable in planning terms.

That said, greater detail with regard to the specific plans proposed would be required with any planning application. Of particular importance will be an explanation of the strategic significance of this proposal and the locational need for the site chosen, including a full explanation of the site selection process. A thorough assessment of biodiversity requirements will also be essential including a detailed Green Infrastructure Statement.

8. The planning fee and the necessary information to validate a planning application:

- Completed "Full" planning application forms
- Location plan with the application site outlined in red and any other land owned by the applicant in blue
- Existing and proposed drawings and site plans
- All documentation listed within the Pre-application request letter together with :
 - A Green Infrastructure Statement
 - Information with regard to the consideration given to the Welsh Language while developing the proposal
 - Protected Species Survey for badger
 - Possible Archaeological information resulting from discussions with Gwynedd Archaeological Planning Service
- Fee of £460 per 0.1ha (or part thereof)

Note: The above information does not provide formal planning consent, and offers an informal opinion regarding your enquiry and where relevant provides advice on how to ensure that your planning application is valid.

Yr eiddoch yn gywir/Yours faithfully



Keira Sweeney

Rheolwr Cynllunio/Planning Manager



Croeso i chi ddefnyddio'r Gymraeg neu'r Saesneg wrth gysylltu efo fi.
You are welcome to contact me in Welsh or English

YMWARTHODIAD

Rhoddir unrhyw farn neu safbwynt a fynegir yn ddiwyll, ond heb ragfarnu'r ystyriaeth a roddir i gais cynllunio. Ni all cyngor a ddarparwyd cyn gwneud cais glymu'r awdurdod cynllunio lleol i ddeiliant penodol. Pan gyflwynir cais cynllunio ffurfiol ni ellir gwneud y penderfyniad terfynol hyd nes bod y Cyngor wedi ymgynghori â phobl leol, ymgynghoreion statudol ac unrhyw barti arall â diddordeb. Yn unol ag Adran 38(6) o Ddeddf Cynllunio a Phrynu Gorfodol 2004, byddwn yn penderfynu ceisiadau yn unol â'r Cynllun Datblygu, oni bai bod ystyriaeth faterol cynllunio yn nodi fel arall. Hefyd, dylech fod yn ymwybodol na all swyddogion warantu'r penderfyniad ffurfiol terfynol a wneir ar gais.

DISCLAIMER

Any views or opinions expressed are given in good faith, without prejudice to the consideration given to any planning application. Any pre-application advice provided does not bind the local planning authority to any specific outcome. When a formal planning application is submitted, the final decision cannot be made until the Council has consulted with local people, statutory consultees and any other interested parties. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, we will determine applications in accordance with the Development Plan, unless material considerations indicate otherwise.

You should also be aware that officers cannot guarantee the final formal decision made on an application.