Uwchraddio'r Grid
Pentir i Drawsfynydd

The Great Grid Upgrade
Pentir to Trawsfynydd

PTNO-AEC-ZZZZ-ZZZZZZ-RPT-ES-000036

Prosiect i Atgyfnerthu'r cysylltiad rhwng Pentir a Thrawsfynydd

Pentir to Trawsfynydd Reinforcement Project

Trawsfynydd Works: Planning Statement
September 2025

nationalgrid

Contents

1. Introduction

1.1 Introduction

1.1.1 This Planning Statement has been prepared as part of a suite of documents that will accompany an application made by National Grid Electricity Transmission (plc) (NGET) ('the Applicant') for full planning permission for the installation of new underground cables, installation of a shunt reactor, and a new gantry at the Trawsfynydd substation and widening of part of the existing access road in the fenced compound ('the proposed works').

1.1.2 The planning application is required for development at the existing Trawsfynydd substation, which is needed to support the wider Pentir to Trawsfynydd Reinforcement Project ('the Project'). Further details on the need case for the proposed works and the Project are set out in Section 2 of this Planning Statement.

1.1.3 The proposed works constitute 'major development', as defined in article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (Ref. 1-1), as it constitutes development carried out on a site having an area of 1 hectare (ha) or more. The application site is defined by the red line boundary in **Figure 2** and covers a total area of 3.05 ha. An application for full planning permission will be submitted to Eryri National Park Authority (ENPA) in its capacity as the relevant Local Planning Authority (LPA).

1.1.4 In accordance with section 61Z of the Town and Country Planning Act 1990 (as amended) (Ref. 1-2), the Applicant is undertaking a statutory pre-application consultation for the proposed works. The purpose of the consultation is to provide adjoining landowners and occupiers, community consultees (including local members), specialist consultees and any non-statutory consultees as necessary with an opportunity to review and comment on the proposals and work undertaken to date, prior to the submission of the planning application to the LPA.

1.1.5 This Planning Statement forms part of the suite of planning application documents prepared to enable effective community and stakeholder engagement to inform and iterate the formal planning application submission, whilst ensuring compliance with the statutory requirements.

1.2 Pentir to Trawsfynydd Reinforcement Project

1.2.1 The Project is illustrated on **Figure 1** and encompasses the reinforcement of overhead lines and cables on the existing circuits ('inland' A circuit and 'coastal' B circuit) between Pentir and Trawsfynydd substations in North West Wales. The Project is part of the wider network transmission upgrades required to facilitate the connection of 50 Gigawatt (GW) of offshore wind by 2030 (5.48 GW in the north-west region). This was confirmed in the National Energy System Operator (NESO) Network Options Assessment (NOA) 2022 (Ref. 1-3) and the Holistic Network Design (HND) 2022 (Ref. 1-4).

1.2.2 The Applicant requires other works to be consented which are integral to the construction, operation and maintenance of the Project. The consents associated with these other works are set out below and illustrated in **Figure 1** below.

1.2.3 Full planning permission is required from the relevant LPA for the following:

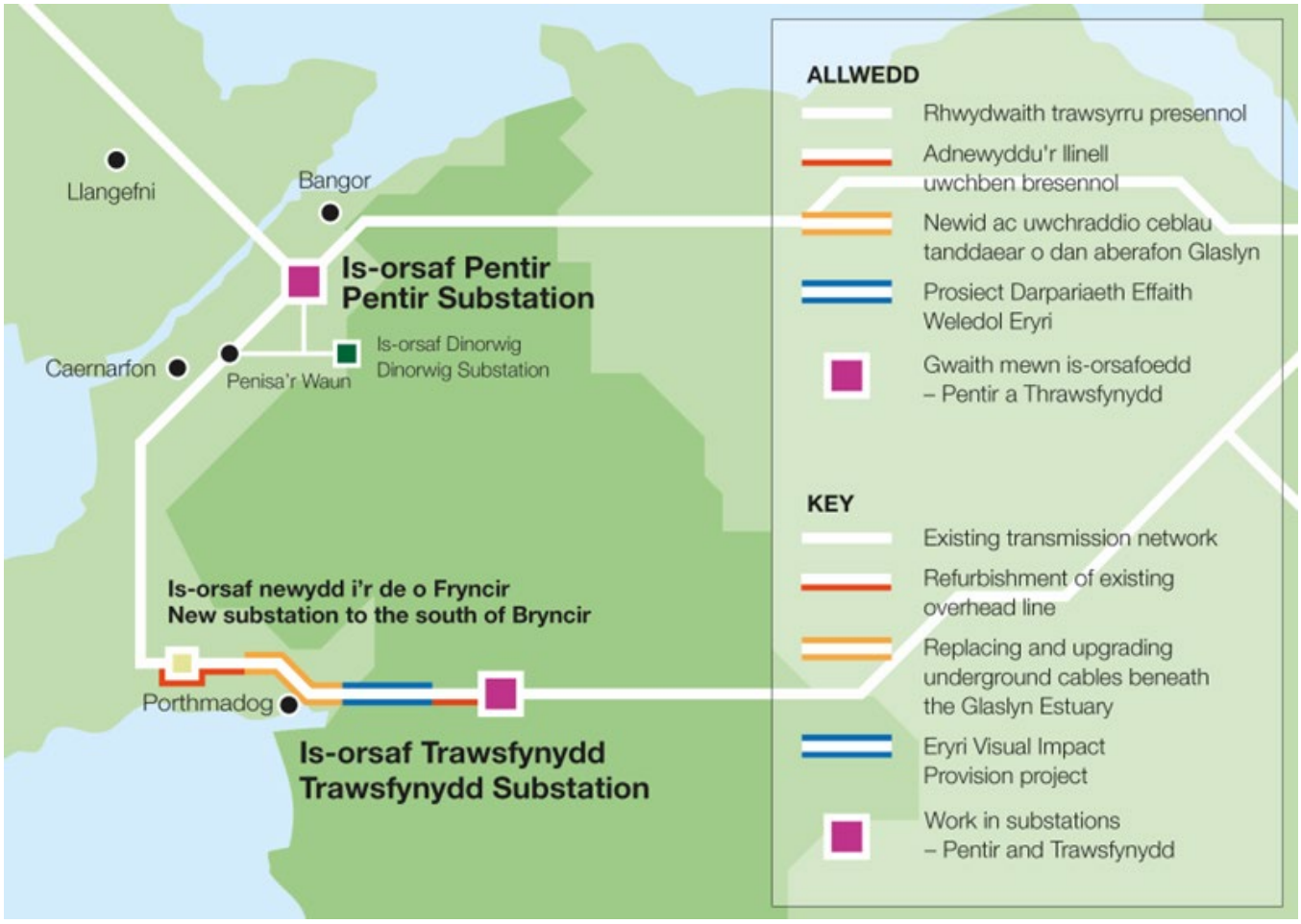
- **Bryncir** – A new 400/132 kV substation south of Bryncir village ('Bryncir Substation'). New 132 kV underground cables (part of the route) to connect the existing SPEN DB route to the new Bryncir Substation.
- **Glaslyn Cables** – an extension to the existing Wern Cables Sealing End Compound (CSEC), replacement of the Glaslyn Cables and associated infrastructure with new 400 kV sections ('inland' A circuit and 'coastal' B circuit) between Wern CSEC and Minffordd CSEC; a new CSEC and a Tunnel Head House previously consented by the Eryri Visual Impact Provision (EVIP) Project (increase of floor height) at Minffordd, the removal of the existing Garth CSEC and the removal of redundant sections of the existing 400 kV and 132 kV cables and making safe sections of redundant Glaslyn Cables left in-situ.
- **Pentir** – Replacement of existing underground cables; installation of new cross site cables in the existing Pentir substation; and ancillary works.

1.2.4 Section 37 consent under the Electricity Act 1989 (Ref. 1-5) is also being sought for the following works:

- **Bryncir** - Replacement of Tower 4ZC067 and downleads into the proposed Bryncir Substation.
- **Bryncir** - A new 132 kV overhead line (for part of the route) to connect the existing SPEN DB route to the Bryncir Substation and removal of a redundant section of SPEN DB route.
- **Trawsfynydd** – Amendment to downleads from the existing Tower 4ZC005 to turn into a new gantry in the substation and amendments to fence line and changes to the alignment of substation compound south-western boundary fence.

1.2.5 The works contained in the Project are at locations between Pentir Substation (SH 559677), approximately 4.5 km southwest of Bangor and Trawsfynydd substation (SH691384), approximately 1.2 km south of Gellilydan in the administrative boundaries of Gwynedd Council and Eryri National Park Authority. The locations of the Project works are illustrated on **ES Figure 7.2.1**.

Figure 1: Project Schematic



1.2.6 The proposed works forming part of this planning application are summarised in section 1.3 and described in further detail in Section 4. Other works associated with the wider Project set out and described in paragraphs 1.2.3 and 1.2.4 will require subsequent approvals either through the Town and Country Planning Act 1990 (as amended) (Ref. 1-1) or the Electricity Act 1989 (Ref. 1-4). Development associated with the proposed works at the Pentir, Glaslyn and Bryncir, as described in paragraph 1.2.3, will be the subject of separate planning applications.

1.3 The Proposed Works

1.3.1 The proposed works comprise work within the red line boundary, which includes land within and outside of the existing Trawsfynydd substation compound. The permanent works would be located in the existing substation compound, with access during construction and operation being gained via the existing substation access roads.

1.3.2 The description of development is:

"Installation of new underground cables, installation of a shunt reactor and a new gantry and widening of part of the existing access road in the fenced substation."

1.3.3 Further details of the proposed works are in Section 4 of this Planning Statement, and a description of the design and access arrangements are in the Design and Access Statement, which supports the planning application.

1.3.4 Full planning permission is being sought for the proposed works. However, in isolation from the wider Project, the proposed works would constitute works benefitting from deemed consent removing the need for full planning permission constituting permitted development under Schedule 2, Class G, Part 17 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (Ref. 1-6), which applies to Wales. Class G applies to electricity undertakings and sets out works carried out by statutory undertakers for the generation, transmission or supply of electricity for the purposes of their undertaking. The Applicant is a statutory undertaker and would benefit from deemed consent afforded by Class G. Permitted development under Class G(a) includes *"the installation and replacement in, on, over or under land of an electric line and construction of shafts and tunnels and the installation or replacement of feeder or service pillars or transforming of switching stations or chambers reasonably necessary in connection with an electric line"*.

1.3.5 The GDPO 1995 (as amended) confirms that development permitted by Class G is only deemed consent if works comply with conditions G.1 (a) and G.2 (a). None of these conditions relate to the proposed works. However, article 3 (10) of the GPDO 1995 (as amended) confirms that development is not permitted by the Order if it constitutes Schedule 1 development within the meaning of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (Ref. 1-7). The proposed works form part of the wider Project, which is EIA development, and so, do not benefit from deemed consent as permitted development under Glass G, Part 17 of Schedule 2of the GDPO 1995 (as amended). Full planning permission is required for the proposed works.

1.3.6 Due to the urgency of the infrastructure upgrades associated with the Project, the works have been identified as part of Ofgem's Accelerated Strategy Transmission Investment (ASTI) framework (Ref. 1-8), which includes decisions to streamline the regulatory approval process.

1.4 The Applicant

1.4.1 The Applicant operates the electricity transmission system in Great Britain and owns the system in England and Wales. Transmission of electricity in Great Britain requires permission by way of a licence granted under Section 6(1)(b) of the Electricity Act 1989 ('the Electricity Act'). The Applicant has been granted a transmission licence and is bound by the legal obligations, which are set out in the Electricity Act and in the transmission licence.

1.4.2 The Applicant is the only company licensed to transmit electricity in England and Wales. Under Section 9 of the Electricity Act, the Applicant is required, in this capacity, to develop and maintain an efficient, coordinated and economical system of electricity transmission to facilitate competition in the supply and generation of electricity.

1.5 Purpose and Structure of this Planning Statement

1.5.1 The structure of this Planning Statement is as follows:

- Chapter 1: Introduction - Introduces the proposed works and the Project, provides context for the preparation of this Planning Statement and planning application, and provides an overview of the content of the planning application and Environmental Impact Assessment (EIA).
- Chapter 2: The Need Case - Sets out the overarching needs case for the proposed works.
- Chapter 3: Site and Surroundings – Provides a description of the Site and the surrounding area, including statutory and non-statutory planning designations, planning policy allocations, the spatial context in relation to the Project and an overview of relevant planning history associated with the Site.
- Chapter 4: The Proposed Works – Details each element associated with the proposed works, the access arrangements and provides an overview of the construction works, which form part of the wider Pentir to Trawsfynydd Reinforcement (PTR) project.
- Chapter 5: Pre-Application Consultation – Provides an overview of the pre-application consultation undertaken for the proposed works, including engagement with Eryri National Park Authority and relevant stakeholders and details of the statutory pre-application consultation to be held.
- Chapter 6: Planning Policy Context – Provides an overview of key legislation relevant to the proposed works, sets out the National Development Framework and Local Development Plan and considers any relevant policies contained in these documents. Policy and legislation that can be considered a material consideration when determining the application is also outlined in this chapter.
- Chapter 7: Planning Appraisal –Presents an appraisal of the proposed works' compliance with the key planning policy identified in Chapter 6 of this Planning Statement.
- Chapter 8: Planning Balance and Conclusion – Provides a summary of the planning balance following the appraisal of the proposed works.

1.6 Form and Structure of the Planning Application

1.6.1 This Planning Statement should be read with the wider application documents outlined in **Table 1-1**. These application documents have been prepared to inform the statutory pre-application consultation. Following the close of the pre-application, it is intended that these documents will be finalised for the purposes of the formal planning application submission to the LPA for determination.

Table 1-1 Application Documents

Application Documents
Forms and Certificates
Application Form
Plans and Relevant Information

Site Location plan (scale of 1:1250 or 1:2500)
Existing Site plan (scale of 1:500 or 1:200)
Proposed Site Plan (scale of 1:500 or 1:200)
Existing Elevations (1:50 or 1:100)
Proposed Elevations (1:50 or 1:100)
Existing Sections (1:50 or 1:100)
Proposed Sections (1:50 or 1:100)
Technical Documents
Planning Statement
Design and Access Statement
Pre-Application Consultation Report
Environmental Statement (including Biodiversity Survey and Report, Noise Assessment and Tree Survey which are national requirements)
Habitats Regulations Assessment
Green Infrastructure Statement
Community and Linguistics Statement

1.7 Environmental Impact Assessment.

1.7.1 EIA screening is the process of determining whether a project falls under the descriptions or thresholds in Schedule 1 and 2 of the Town and Country Planning (Environmental Impact Assessment) (Wales) 2017 (the '2017 TCP EIA Regulations') (Ref. 1-7) or the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (2017 Electricity Works EIA Regs)(Ref 1-9) and if there is a potential for significant effects on the environment.

1.7.2 No element of the Project falls within the developments identified in Schedule 1 of the 2017 TCP EIA Regs or the 2017 Electricity Works EIA Regs (Ref. 1-9) and none are a type of development described in Schedule 2 of the 2017 TCP EIA Regs. However, NGET is mindful that the Regulations have been found to have a "*wide scope and broad purpose*" and that the Glaslyn Cables section of the Project could be deemed an urban development project under 10. Infrastructure Projects in Schedule 2 due to the overall area of the development exceeding 5 hectares (ha).

1.7.3 A Screening Opinion for the Glaslyn Cables aspect of the Project was requested on 6 September 2024, and a Screening Opinion was received on 10 October 2024 confirming an EIA would be required. An EIA has been undertaken for the whole Project and is described in more detail in **Chapter 3** of **ES Volume 1: Project Introduction**. Due to the urgency of the infrastructure upgrades associated with the Project, the works have been identified as ASTI. To maintain an accelerated programme a Scoping Opinion has not been requested from the competent authorities that will receive consent applications. Instead, the Scoping stage of the EIA process has been incorporated into the Environmental Statement (ES).

1.7.4 The ES sets out the findings of an EIA. This ES will accompany all the consent applications required by the Project and addresses requirements under both the 2017 TCP EIA Regs and the 2017 Electricity Works EIA Regs. There are no material differences between these two sets of regulations in terms of the required information for inclusion in an ES.

2. The Need and Benefit Case

2.1 Policy and Legislative Background

2.1.1 The Paris Agreement (Ref. 1-10) was adopted in December 2015 at the United Nations Climate Change Conference (COP21). It introduced a common goal and commitment of reducing greenhouse gas emissions and limiting global temperature rises to combat climate change. It was a landmark agreement in the multilateral climate change process as it brought into force internationally binding emission reduction targets and legally binding targets for developed countries (including the United Kingdom) to reduce greenhouse gas emissions bringing UN members together to combat climate change and adapt to its effects.

2.1.2 The UK has since made several further legal commitments to address climate change and meet the objectives of the Paris Agreement. This includes introducing the Net Zero target for greenhouse gas emissions by 2050 and updating legally binding carbon budgets to cap emissions over five-year periods. The UK Government has also developed and published a number of policy documents and strategies to drive the transition to net zero and provide opportunities to increase energy efficiency.

2.1.3 The Energy White Paper (Ref. 1-11), published in December 2020, outlined a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable electricity supply, and affordable bills for households and businesses. This was built on by the Net Zero Strategy (Ref. 1-12), published in October 2021, which set out a long-term plan for the economy-wide transition to net zero that will take place over the next three decades. The British Energy Security Strategy (BESS) (Ref. 1-13) (published in April 2022, and the Growth Plan (Ref. 1-14) published in September 2022 further reinforced ambitions and the importance of addressing the UK's underlying vulnerability to international oil and gas prices and reducing the UK's dependence on imported oil and gas. Powering Up Britain (Ref. 1-15), published in March 2023, set out how the government will enhance the UK's energy security, seize the economic opportunities of the transition, and deliver on the UK's net zero commitments.

2.1.4 The 'Clean Power 2030 Action Plan: a new era of clean electricity published in December 2024 (Ref. 1-16) sets out the UK Government's targets for the 2030 capacities of key technologies at national and regional level including an ambition to achieve 43-50 gigawatts (GW) of offshore wind by 2030. The latest consultation draft NPS' published in April 2025 explicitly refer to the Government's 2030 Clean Power Action Plan and the need for significant new energy infrastructure.

2.1.5 The Welsh Government also has ambitious targets for renewable energy and the electricity transmission network, to make substantial contributions to decarbonisation and energy security. Wales's net zero target highlights the Welsh Government's commitment to achieving net-zero by 2050, and for Wales to meet the equivalent of 100% of its annual electricity demand from renewable energy sources by 2035. Additionally, the Environment (Wales) Act 2016 (Ref. 1-17) sets out the Welsh Government's interim carbon budgets, which are legally binding targets to reduce emissions compared to 1990 levels.

2.1.6 Wales and UK Governments have set ambitious legally binding targets for developing new homegrown sources of renewable energy at scale over the next decade. In 2017, the Welsh Government set a target to meet the equivalent of 70% of Wales's electricity demand from renewable energy sources by 2030 as part of its commitment to a more sustainable future for Wales. The latest Energy Generation in Wales Report (Ref. 1-18) is based on 2022 statistics and was published in October 2023. This confirmed that the equivalent of approximately 59% of Wales' annual electricity consumption came from renewables, working towards the 70% target by 2030. This target was upscaled in July 2023 to meet 100% of the demand for electricity from renewable energy sources by 2035 following a consultation on Wales' Renewable Energy Targets in January 2023.

2.1.7 The National Infrastructure Commission for Wales published its report 'Preparing Wales for a Renewable Energy 2050' (Ref. 1-19) in October 2023. This report notes *"that the Welsh Government has set targets to meet the equivalent of 100% of its annual electricity demand from renewable sources by 2035 and to achieve net zero by 2050".* However, it also notes that *"the current levels of renewable energy generation…suggest that significant additional interventions will be necessary to achieve the target".* It highlights the importance of ensuring that Wales has a grid system that is fit for the future of renewable energy generation and recommends that, by 2025, Ofgem should reform the system that plans for and delivers grid access for renewable energy to enable rapid deployment.

2.2 The Need and Benefits of the Project and Proposed Works

2.2.1 The Energy Act 2023 (Ref. 1-20) established an independent system planner and operator to help accelerate Great Britain's energy transition, creating the National Energy System Operator (NESO). NESO is built on the previous experience as the National Grid Electricity System Operator (ESO). In July 2022, ESO recommended a new electricity network design called the 'Pathway to 2030 Holistic Network Design' (Ref. 1-21) which connects 23 GW of offshore wind power. The aim of the Pathway to 2030 Holistic Network Design is to help to unlock the Government's ambition of 50 GW of offshore wind by 2030 by setting out a single, integrated approach to support large scale delivery of electricity from offshore wind which is required across the UK.

2.2.2 The NESO annually reviews the network capabilities and requirements which includes the following:

- Future Energy Scenarios – are developed annually by the NESO with input from industry and other stakeholders. The Scenarios represents a range of different, credible ways in which the energy could evolve taking account of policy and legislation, including net zero targets.
- Electricity Ten Year Statement – is an annual assessment by NESO which, by using data from the Future Energy Scenarios, identifies points on the transmission system where more network capability is needed to ensure that energy is delivered efficiently and reliably to where it is needed.
- Network Options Assessment – sets out the NESO's recommendation for which reinforcement projects should receive investment during the coming year. These are assessed by the NESO so that the most economic and efficient solutions are recommended to proceed, and others told to hold or stop. The Assessment uses the

latest methodology approved by Ofgem, and outputs from Future Energy Scenarios and Electricity Ten Year Statement.

2.2.3 One of the documents that was published as part of the Pathway to 2030 Holistic Network Design is National Grid's 'Network Options Assessment' (NOA). This identifies which network reinforcement projects should receive investment and when. The latest National Grid NOA is the 'NOA 2021/22 Refresh' (Ref. 1-22), which identifies 94 schemes that are required to meet the Government's ambition for 50 GW of offshore wind by 2030. The analysis has demonstrated that there is insufficient transmission capacity in the existing electricity transmission network in North Wales to connect additional consented, forecasted and foreseeable large scale power generation developments, notably from renewable offshore energy in the Irish Sea off the north coast of Wales and west coast of England. The 'Pentir to Trawsfynydd cable replacement' is one of the projects identified as the Holistic Network Design's essential options to deliver Pathway to 2030. The Earliest In-Service Date (EISD) for the Project is 2027, with the earliest optimal delivery date being 2028 having regard to regulatory and consenting requirements, including the need to secure planning permission and section 37 consent.

2.2.4 Building on this ambition, in March 2024 NESO published the 'Beyond 2030' (Ref. 1-23) report, mapping the way to a clean, secure and affordable energy future by facilitating the connection of an additional 21 GW of offshore wind, laying the foundations for a decarbonised electricity system in the UK. The upgrade to the Pentir to Trawsfynydd electricity network was highlighted in the NESO 'Beyond 2030' report. The Project would play an important part in improving the Grid network and helping to facilitate the connection of this additional offshore wind.

2.2.5 The 'Clean Power 2030 Action Plan: a new era of clean electricity' aims to tackle the three major energy challenges: the need for a secure and affordable energy supply, the creation of essential new industries and the need to reduce greenhouse gas emissions. The Clean Power 2030 Action Plan recognises that around twice as much new transmission network infrastructure will be needed in the nation's grid by 2030 than has been built in the past decade. The Action Plan recognises the need to reduce the end-to-end delivery time for new transmission infrastructure to deliver necessary infrastructure in a timely manner to support the development of clean energy generation projects.

2.2.6 The proposed works will provide additional transmission capacity in North Wales that is essential to distribute and make use of both new and existing energy generation in the area. The existing 400 kilovolt cables are near the end of their operational life and as installed could not operate at the capacity now required. These cables need replacing and it is considered that there is no suitable alternative to the replacement of the existing cables. These cables will be replaced with new 400 kilovolt cables. If the cables are not upgraded their operational efficiency will continue to decrease and it would not be possible for the electricity that is generated to be transferred to areas where it is needed. The additional capacity will allow energy generated by renewable sources to be transferred around the region and will assist the government in meeting targets for reducing carbon emissions and achieving Net Zero. The proposed works form part of the wider Pentir to Trawsfynydd Reinforcement project and without the replacement of the existing underground 400 kilovolt (kV) and associated infrastructure reinforcement then this section of the PTR project will form a bottle neck and the objectives of the PTR project will not be achieved. Government policy recognises that additional transmission capacity is necessary, and outlines support, specifically for the Pentir to Trawsfynydd Reinforcement Project as a strategic project that will reinforce and increase capacity of

the grid. The proposed works will benefit the region by providing a secure and reliable supply of electricity.

2.2.7 The documents outlined above demonstrate that there is clear policy support for the provision of an efficient and effective electricity transmission network. There is a clear need for the proposed works to replace old and inefficient transmission lines and equipment to deliver capacity in the transmission network recognised by national policy.

2.3 Grid Connection Capacity Requirements

2.3.1 The NESO has also published a suite of documents under the 'Pathway to 2030: A holistic network design to support offshore wind deployment for net zero' (July 2022) (Ref. 1-21) in response to the UK Government's ambitions concerning offshore wind (see below). The Pathway to 2030 Holistic Network Design (HND) Executive Summary recognises that as the scale of offshore wind deployment increases so does the need for additional transmission infrastructure to deliver the electricity generated to customers. It states that:

"A significant step change is required to move from the current capacity of 11.3 GW to 50 GW by 2030, both in the roll out of the additional offshore wind farms themselves and the network required to connect and transport the electricity to where it can be used. Therefore, innovative thinking in network design has never been more important to ensure delivery of affordable, clean and secure power and meet the UK Government's ambitions.

Publication of the innovative HND is just the start of the delivery of the transmission network required to facilitate 50 GW offshore wind by 2030…. Specifically, the time taken to build onshore transmission network infrastructure will need to be significantly reduced in order to meet the offshore wind ambitions and net zero targets."

2.3.2 The Network Options Assessment published in July 2022 forms part of the Pathway to 2030 suite of documents. In relation to Wales, this notes that the HND recommends a coordinated network on the west coast of the country resulting in a significant power import to North Wales and a requirement to export this power to areas of the country with greater demand and to satisfy boundary transfer requirements. Table 3.10 of the Assessment identifies that '*Pentir to Trawsfynydd cable replacement*' and '*A second transmission circuit on the existing Pentir to Trawsfynydd route'* are HND essential options for Wales. These are the components central to the Project which include cables and associated equipment, that were installed in the 1960s, are a limiting factor on the circuit and are now coming to the end of their operational life. The replacement of the cables is essential to enable an increase to the network capacity that is required to contribute towards the Welsh Government's renewable energy targets summarised above.

2.3.3 The need for the Project is elevated further by Ofgem identifying it as one of the Accelerated Strategic Transmission Investment (ASTI) projects. ASTI projects form part of a new regulatory approval and funding framework for onshore transmission projects, which Ofgem sets out are required to deliver the Government's 2030 Net Zero ambitions. To help meet those ambitions, Ofgem has identified that significant upgrades to the capacity of the electricity network in North Wales are required to allow the connection of new offshore windfarms.

3. Site and Surroundings

3.1 Description of the Proposed Works Site

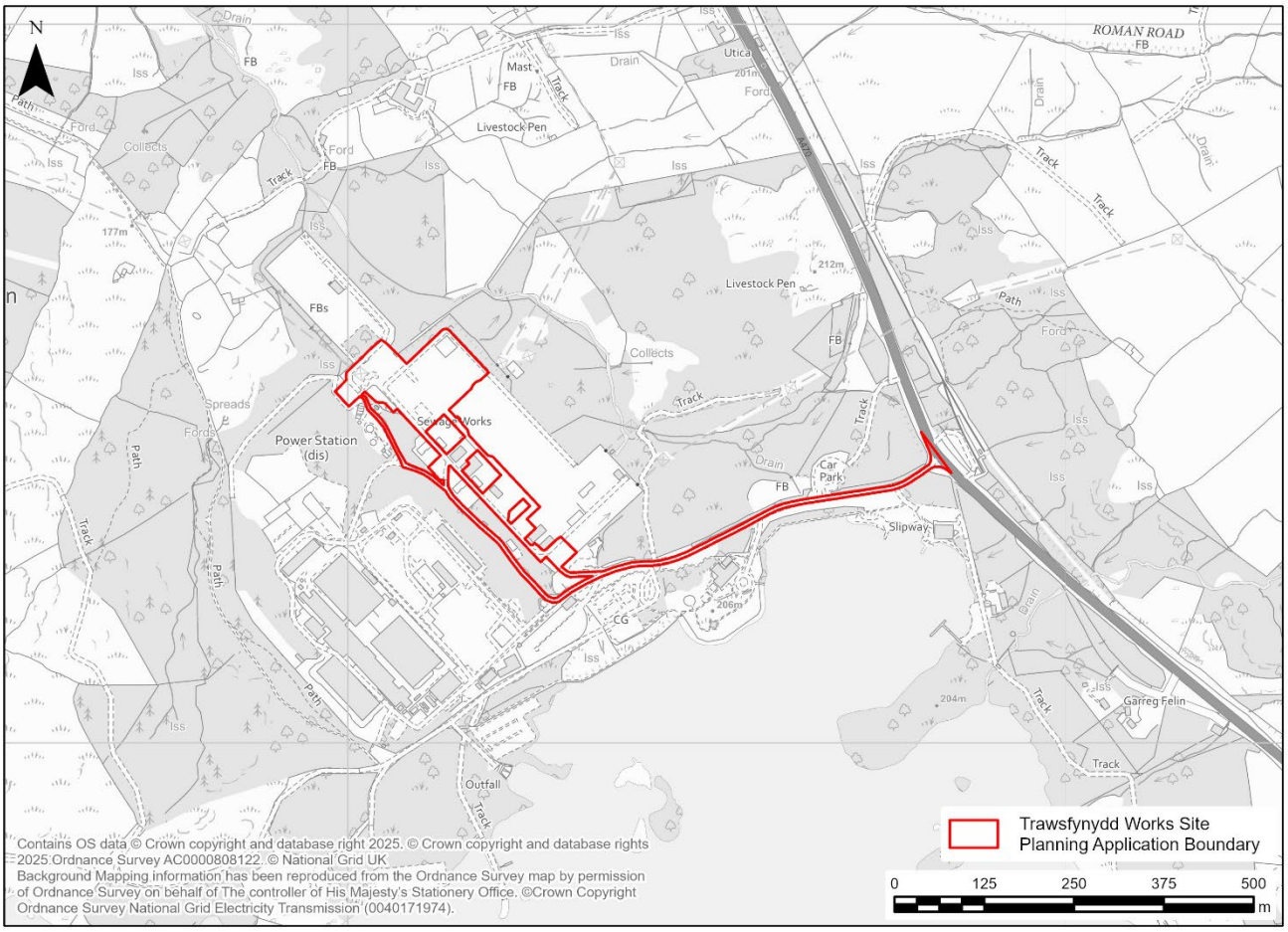
3.1.1 The proposed works site is defined by the red line boundary indicated on **Figure 2** below and is in the administrative boundary of Eryri (Snowdonia) National Park Authority (ENPA). The proposed works site is approximately 1.2 km south of Gellilydan and is approximately 2.5 km north-west of the village of Trawsfynydd.

3.1.2 The proposed works site is approximately 3.05 ha and mainly consists of the land within the existing Trawsfynydd substation compound. As indicated on **Figure 2** below, the red line boundary includes an existing access road which provides dual access to Llyn Trawsfynydd, as well as Trawsfynydd substation. The red line boundary extends approximately 413 metres (m) to the east of the substation boundary to meet the A470.

3.1.3 Trawsfynydd substation is bound on most sides by mature woodland and vegetation, save for the access road to the A470, which provides access to the substation along the southern and eastern boundaries. The proposed works site mainly comprises of hardstanding, although some trees and scrub are scattered across the proposed works site.

3.1.4 Trawsfynydd substation consists of existing transmission infrastructure, which includes the existing overhead 4ZC line that run from the Substation to the north-west, and associated plant. The Substation comprises buildings used as office and welfare facilities, electrical infrastructure such as gantries and insulators, and scattered scrub and scattered trees.

Figure 2: Red line boundary



3.2 Description of Surrounding Area

3.2.1 The proposed works site is mostly surrounded by areas of woodland on all sides. Beyond the wooded areas there are parcels of agricultural land of ALC Grade 4 interspersed with further wooded areas and trees. Some of these wooded areas are semi natural ancient woodland.

3.2.2 Immediately south of the proposed works site there are two car parks, one which fronts Llyn Trawsfynydd and the other which is further southwest and extends to the front of the former Nuclear Power Station. Llyn Trawsfynydd, approximately 155 m south of the proposed works site is a popular tourist destination used for walking, cycling, fishing, canoeing and kayaking. A fishing centre and café are approximately 420 m south of the proposed works site.

3.2.3 The closest farmstead is approximately 315 m north of the proposed works site, and there are no residential properties within 250 m of the proposed works site, with the closest being approximately 315 m north of the proposed works site. There is also a settlement, Gellilydan, approximately 1.2 km north of the proposed works site, which contains several residential streets and a caravan and motorhome club campsite. There are no further settlements within a 2 km radius of the Site.

3.2.4 The pylons of the existing 4ZC overhead line run from the proposed works site in an eastern direction, becoming increasingly visible as the topography increases. The pylons are visible from many views in the vicinity of the proposed works site.

3.2.5 There are four Public Rights of Way (PRoW) within 500m of the Site: Maentwrog No 18 footpath, 50-m north (of the access road entrance); Maentwrog No 5 footpath, 210 m west; Maentwrog No 21 footpath, 350 m north and Maentwrog No 21 bridleway, 290 m north-west. The Trawsfynydd to Gellilydan cycle croute is under development and will connect to the National Cycle Network (NCN) Route 82 Bangor to Fishguard when complete. The closest part of this route is approximately 300m west of the Trawsfynydd substation.

3.2.6 The closest part of the former Trawsfynydd Nuclear Power Station (which is currently being decommissioned) is approximately 50 m southwest of the existing Trawsfynydd substation.

3.2.7 The A470 trunk road lies approximately 560 m to the east of the proposed works site and runs from Llandudno in North Wales to Cardiff in South Wales. Access to the proposed works site is provided via an access road from the A470.

3.3 Environmental Designations

3.3.1 The proposed works site lies in the Eryri National Park, which was designated as a National Park in 1951 and is the largest National Park in Wales, covering approximately 213,200 ha across parts of Gwynedd and Conwy. The dual purposes of National Parks, as required by the Environment Act 1995 are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- To promote opportunities for the understanding and enjoyment of the 'Special Qualities' of the area, by the public.

3.3.2 The ENPA has a duty in taking forward these purposes to seek to foster the economic and social wellbeing of local communities in the National Park.

3.3.3 The proposed works site lies within the National Landscape Character Area (NLCA) 06 Snowdonia and exhibits some key characteristics of the NLCA, including a mountainous topography, rivers, lakes and waterfalls and an upland character to principal land cover elements. The proposed works site lies in the Trawsfynydd Basin and Cwm Prysor Registered Landscape of Outstanding and Special Interest in Wales (Cadw), which is listed in the Register of Landscapes of Historic Interest in Wales as defined in the Eryri Local Development Plan (ELDP) (Ref. 1-24).The proposed works site lies in the Trawsfynydd Zone of Snowdonia Enterprise Zone (SEZ, as designated by the Eryri Local Development Plan).

3.3.4 Due to the proximity of the proposed works site to Llyn Trawsfynydd, the proposed works site lies in an area at risk of flooding from reservoirs, as defined on the Natural Resources Wales Flood Map for Planning (Ref. 1-25). However, the risk from this source is very low due to the regulations imposed on reservoirs under the Reservoirs Act 1979 (Ref. 1-44). The proposed works site does not lie in an area at risk of flooding from rivers, seas or surface water and watercourses. There is a small area along the north-west boundary of the proposed works site that is in Flood Zone 2 for surface water flooding and further

areas in Flood Zones 2 and 3 for surface water flooding within 100 m of the proposed works site boundary.

3.3.5 There are no statutory, non-statutory or designated heritage assets within the proposed works site boundary.

3.3.6 Within 1 km of the proposed works site there are no statutory ecological designations, although there is a site of international importance approximately 1.08 km north-east of the Site. This site is known as Migneint-Arenig-Dduallt and is designated as a SAC, SPA, and SSSI.

3.3.7 Within 1 km of the proposed works site there are areas of priority habitats and ancient woodland. The priority habitats include areas of lowland fens and reedbeds, lowland dry acid grassland, lowland heathland, and purples moor grass and rush pastures. There are several pockets of semi natural, restored, and Plantation of Ancient Woodland Site (PAWS) that are within 700 m of the Site. The closest is approximately 180 m west of the proposed works site and is a plantation on ancient woodland, with several areas of semi natural ancient woodland approximately 600 m east of the proposed works site, immediately adjacent to where the A470 meets the access road. There is an area of restored ancient woodland approximately 500 m north of the proposed works site.

3.3.8 Within 1 km of the proposed works site there are several historic assets of both statutory and non-statutory designation. The statutory designations within 1 km of the proposed works site include Listed Buildings, Scheduled Monuments, and Registered Parks and Gardens. The non-statutory designations within 1 km of the proposed works site include Roman roads and national monuments.

3.3.9 There are two designated heritage assets on the former nuclear power station: Grade II* listed Dragon Square (approximately 120 m from the proposed works site) and Dame Sylvia Crowne Garden Registered Park and Garden (approximately 200 m from the Site boundary).

3.3.10 There are four Grade II listed buildings near the proposed works site, the closest of which is approximately 600 m north. There are four Scheduled Monuments, with the closest being the Enclosed Hut Group at Nurse Cae Du, which is approximately 500 m north of the proposed works site.

3.3.11 A Roman Road runs east-west and north-south approximately 350 m north of the Site. There are approximately 30 national monuments, which are primarily concentrated to the west of the proposed works site: the closest is approximately 80 m west from the proposed works site and Trawsfynydd Lakeside Halt approximately 40 m from the access road.

3.3.12 There are four PRoWs in a 500m radius of the proposed works site. Two PRoWs run from east to west to the east of the proposed works site, whilst a further two PRoWs run from east to west, approximately 900 m north from the proposed works site. A further three PRoWs, which are connected, run from east to west and directly north, approximately 300 m north of the proposed works site.

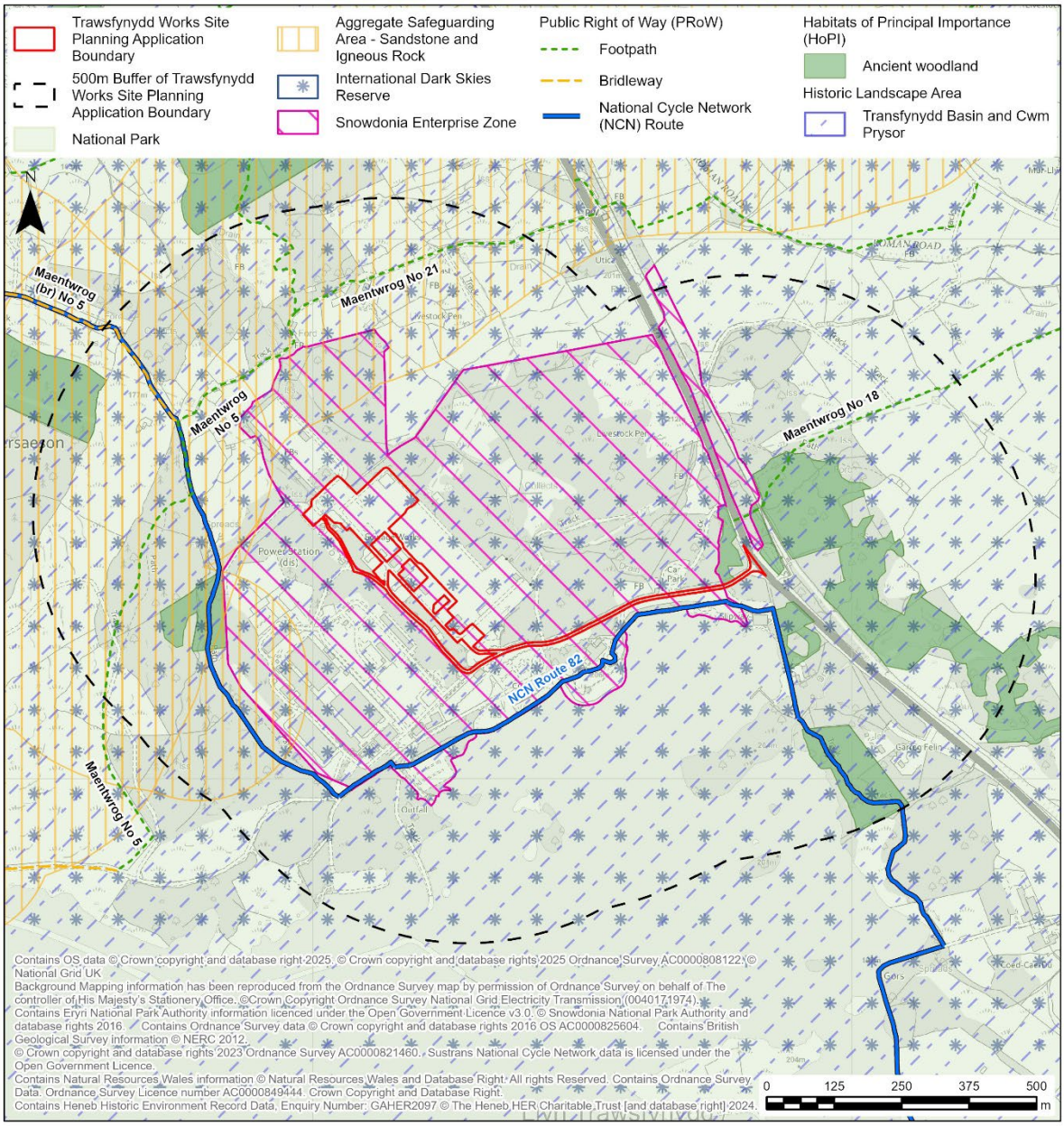
3.4 Local Planning Policy Allocations and Designations

3.4.1 The proposed works site falls in the administrative boundary of Eryri National Park Authority. The relevant Local Plan is the ELDP, and an extract of the Proposals Map is provided in **Figure 3** below.

3.4.2 The proposed works site lies in the Trawsfynydd part of the Snowdonia Enterprise Zone. This is defined within Development Policy 27: Snowdonia Enterprise Zone, which sets out specific development that would be acceptable in this area. For the Trawsfynydd area, this includes carbon energy businesses and energy generation technologies.

3.4.3 The proposed works site lies in an International Dark Skies Reserve area (which applies to all of the National Park) and is therefore subject to Development Policy 2: Development and the Landscape of the ELDP.

Figure 3: Local Plan Proposals Map



3.5 Relevant Planning History

3.5.1 A review of the online planning register for Eryri National Park Authority (Ref. 1-26) has been conducted to establish the relevant planning history associated with the Site and land within 2 km of the red line boundary. The planning history search included applications for major development that were submitted and are currently awaiting determination or approved in the last five years as well as consents relating to, or associated with, the original substation. Minor applications, such as changes of use or householder applications, have been excluded from the search. **Table 3-1** below provides details of these applications.

Table 3-1 Relevant Planning History

Application Reference	Description	Status	Site Location	Distance from Proposed Works Site
NP5/73/287S	Repair, improvement and extension of laydown area	Permitted with conditions (09-10-2023)	Trawsfynydd Nuclear Power Station, LL41 4DT	150 m north-west of the Red Line Boundary
NP5/73/287T	Extension of Phase 2 laydown area by raising the existing ground levels around its peripheries to provide further laydown space	Permitted with conditions (25-11-2024)	Decommissioning Site, Trawsfynydd. LL41 4DT	Less than 100m west of the Red Line Boundary

3.5.2 The planning history search has shown there to be no local planning applications or permissions that would impact the proposed works. There are no Developments of National Significance, or Nationally Significant Infrastructure Projects within a 10 km radius of the Site.

4. The Proposed Works

4.1 Introduction

4.1.1 As outlined in Chapter 1 of this Planning Statement, planning permission will be sought for the following development at Trawsfynydd substation:

"Installation of new underground cables, installation of a shunt reactor and a new gantry"

4.1.2 These works are described in further detail below.

4.2 Removal of Existing Equipment

4.2.1 Redundant existing slabs and foundations would be demolished and the waste disposed of into a designated waste skip in the Site boundary.

4.2.2 Existing redundant oil filled high voltage cables and associated plant would be drained, decommissioned and dismantled by a specialist contractor and waste would be disposed of off-site.

4.2.3 **Section 2.3 of ES Volume 5 Trawsfynydd Works** provides further detail on the removal of existing equipment as part of the proposed works.

4.3 New Equipment

New Structures

4.3.1 A new shunt reactor would be installed, as well as an air insulated substation (AIS) circuit bay and gantry. Delivery of the new shunt reactor (abnormal indivisible load (AIL)) to the Trawsfynydd works site would be planned and co-ordinated. The Trawsfynydd 400kV substation and the former Trawsfynydd Nuclear Power Station site have received and generated AIL journeys throughout their operational lives.

4.3.2 Drainage and manholes would also be constructed. Two new portable relay rooms will also be installed.

Cables

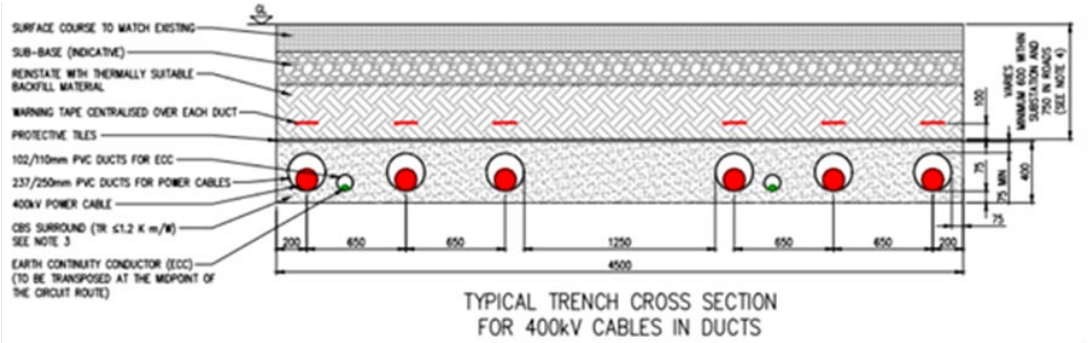
4.3.3 Each 400 kV cable would be a 2,500 millimetres squared (mm^2) single core cable comprising a segmented copper conductor, semi-conducting polymer conductor screen, extruded cross-linked polyethylene insulation, extruded semi-conducting polymer insulated screen, smooth welded aluminium sheath and high-density polyethylene outer sheath. The complete cable outer diameter is approximately 145 millimetres (mm).

4.3.4 The proposed works would include the re-use of infrastructure (where suitable) for an existing circuit, the 400 kV cable, which runs along the western boundary of the substation compound would be replaced.

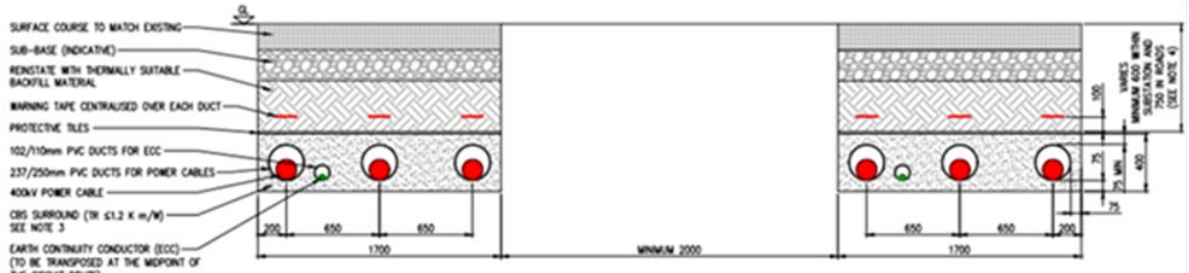
4.3.5 A new 400 kV would be routed along the existing substation access road, in parallel to the existing 400 kV cables approximately 40 m east.

4.3.6 The cables would be contained in the ducts in separate tranches or concrete troughs approximately 1 m deep, as illustrated in **Figure 4.**

Figure 4: Cable Trench Cross Section



TYPICAL TRENCH CROSS SECTION
FOR 400kV CABLES IN DUCTS



TYPICAL TRENCH CROSS SECTION
FOR 400kV CABLES IN DUCTS IN
SEPARATE TRENCHES

Reinstatement

4.3.7 In the Trawsfynydd substation compound, all working areas would be reinstated with 300 mm of type 1 and 75 mm of 10 mm limestone chippings.

4.4 Access

4.4.1 Construction access to the Site would be via the existing Trawsfynydd substation access road off the A470.

4.4.2 Part of an existing internal access road in the fenced substation will be permanently widened to accommodate the delivery of the shunt reactor as an AIL.

4.5 Construction

Installation Activities

4.5.1 Foundations for the new structures, including AIS circuit bay, shunt reactor and landing gantry, would be constructed from reinforced concrete. The concrete would be delivered to the proposed works site by truck mixer, ready mixed from the nearest supplier.

4.5.2 Steel structures and associated electrical equipment would be erected using a combination of mobile cranes, mobile elevation working platforms and telehandlers.

4.5.3 Stone and aggregates would be delivered to the Trawsfynydd works site as and when required, from nearby quarries.

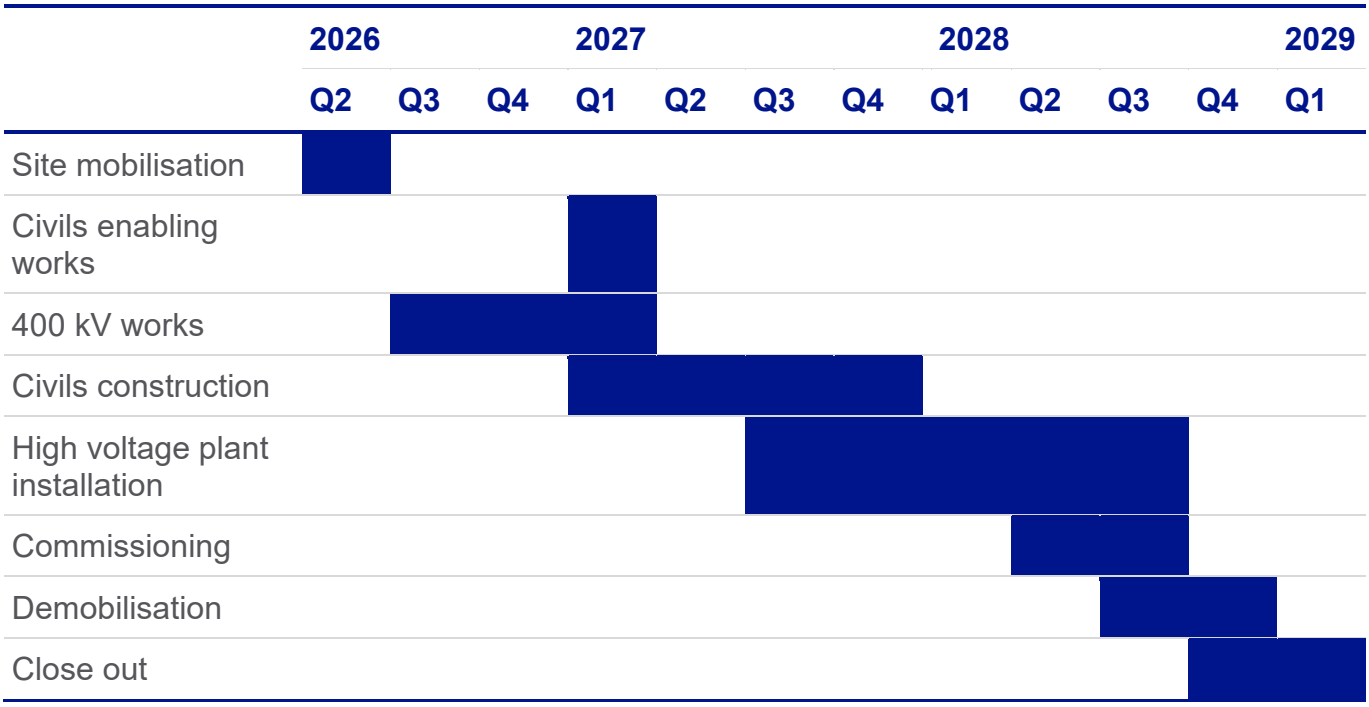
4.5.4 The ducts and cable drums would be securely stored within the compound area. A combination of hydraulic winches and a crane would be used to install the ducts and troughs.

4.5.5 Sheet scaffolding would be placed around the cable sealing end structure to provide suitable access for cable termination and mounting structures; the scaffolding would be removed on completion.

Construction Programme

4.5.6 The construction of the proposed works are planned to be undertaken over a period of approximately three years from Q2 2026 to Q2 2029. Construction will occur in phases to coordinate with the wider Project, which will include the activities below.

Table 4-1 Construction Programme



4.5.7 As highlighted in the ES (**Volume 5: Trawsfynydd Works**), construction activities will broadly comprise of the following:

- Site mobilisation – site set up for cabins and civils.
- Civils enabling works – access, main site officer establishment, earthworks, drainage and platform.
- 400 kV works – de-oiling and purging of the existing cables; removing lids, breaking concrete bound sand and exposing cables; cutting at capping at joint bays, removal of cables; and clean throughs and removal of steelwork.
- Civils construction – foundations superstructure, building services and finishes.
- High voltage plant installation.
- Commissioning – commissioning test, starting with testing the individual items of plant and culminating with testing the installed system as a whole.

- Demobilisation – removal of all temporary infrastructure i.e. cabins and offices.
- Close out – handover assets and final as built drawings.

Construction Site Layout

4.5.8 A construction compound is proposed in the existing fenced Trawsfynydd substation close to the entrance. The compound would comprise office and welfare facilities and car parking.

4.5.9 Existing hardstanding areas for material storage and laydown would be provided at two separate locations. The first would be halfway along the main internal access road and a second close to the area allocated to the new proposed AIS circuit bay.

4.5.10 Lighting the proposed works during the darker evenings would be by task lighting and low-level lighting to access walkways to ensure safe pedestrian passage from the site welfare facilities to work face.

Staffing, Employment and Hours of Working

4.5.11 As stated in the **ES Volume 5: Trawsfynydd Works**, the number of staff on the Site would vary according to the construction phase and activities being undertaken. However, it is anticipated that the following would be required for each phase:

- Removing and decommissioning old equipment, concrete break out of slabs and foundations – 10 operatives
- Civil construction of a new AIS bay and shunt reactor bund – 16 operatives
- High voltage mechanical and electrical services installation – 8 operatives
- Constructing the new duct routes for the two circuits – 12 operatives
- Installing, terminating and testing the new cable – 8 operatives
- Installing shunt reactor (by others) – 6 operatives

4.5.12 Generally, construction activities would be undertaken during daytime periods only, from Monday to Friday 7:30 am to 5:30 pm (including an hour set up and hour shut down). No bank holiday or weekend working will be undertaken, unless agreed with the Local Planning Authority (ENPA). There may be some periods of extended or 24-hour working, however this would be by agreement with ENPA.

4.6 Operation

4.6.1 The Trawsfynydd substation is manned and there would be no change to the current frequency of attendance, inspections and maintenance regimes during operation because of the proposed works. Maintenance of the substation is triggered by issues arising from monthly inspection.

5. Pre-Application Consultation

5.1 Pre-application Engagement with Eryri National Park Authority

5.1.1 The Applicant has undertaken pre-application engagement with Eryri National Park Authority during 2024 and 2025. This has included virtual meetings, email correspondence and telephone conversations on a number of matters such as the scope of the application. Further engagement is expected with the Authority prior to the submission of the planning application(s).

5.2 Pre-Application Engagement with Other Stakeholders

5.2.1 Throughout the development of the proposed works, the Applicant has engaged with a number of other stakeholders through face-to-face meetings, virtual meetings, letters, e-mails and telephone calls. Organisations and individuals consulted include Natural Resources Wales, Heneb, Cadw, landowners and members of the public.

5.3 Statutory Pre-Application Consultation

5.3.1 In accordance with Section 61Z of the Town and Country Planning Act 1990 (as amended) and Part 1A of the Town and Country Planning (Development Management Procedure) (Wales)(Amendment) Order 2016 (Ref. 1-27), all major developments are required to undertake pre-application consultation prior to submitting a planning application. Consequently, and in accordance with the regulations, a statutory pre-application consultation is being undertaken in respect of the proposed works.

5.3.2 This Planning Statement forms part of the suite of planning application documents prepared for the statutory pre-application consultation. Following consultation, further details on the statutory pre-application consultation process will be presented in the Pre-Application Consultation Report.

6. Planning Policy Context

6.1 Introduction

6.1.1 This section sets out the key legislation and planning policy that is considered relevant to the proposed works.

6.2 The Development Plan

6.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (Ref. 1-28) and paragraph 1.18 of Planning Policy Wales requires the LPA to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise. Therefore, this section summarises the development plan planning policies relevant to the proposed works. The Development Plan for the proposed works site comprises:

a) Future Wales – The National Plan 2040 (Ref. 1-29; and

b) Eryri Local Development Plan 2016 – 2031 (Ref. 1-24)

Future Wales – The National Plan 2040

6.2.2 Future Wales: The National Plan 2040 ('Future Wales') (Ref. 1-29) was adopted by the Welsh Government in 2021 and is the National Development Framework (NDF) for Wales. Future Wales sets out the spatial strategy for growth and development in Wales. This includes providing a framework for the location of nationally significant development.

6.2.3 Chapter 2 of Future Wales provides an overview of opportunities and constraints to future growth. This includes progressing a reduction in Greenhouse Gas Emissions, which includes supporting the low carbon economy and the development of renewable energy (particularly wind) and resultant need for the new strategic grid infrastructure to support the growth of renewable and low carbon electricity generation.

6.2.4 Policy 5 – 'Supporting the rural economy' provides Welsh Government support for sustainable, appropriate and proportionate economic growth in rural areas. The supporting text sets out strong support for the development of innovative and emerging technologies, including those that play a key role in helping to decarbonise Wales.

6.2.5 Policy 8 – 'Flooding' requires the consideration of flood risk management in development proposals while Policy 9 – 'Resilient Ecological Networks and Green Infrastructure seeks to ensure the enhancement of biodiversity.

6.2.6 Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure confirms support for the principle of the development of renewable and low carbon energy from all technologies and at a scale to meet future energy needs. The policy recognises the importance of the provision of new grid infrastructure in delivering the growth in renewable energy provided that infrastructure is "*designed to minimise visual impact on nearby communities*". It goes on to state that the Welsh Government is committed to working with stakeholders including National Grid and to reducing barriers to the implementation of new grid infrastructure.

6.2.7 The proposed works site is in North West Wales. Policy 24: North West Wales and Energy supports North West Wales as a location for new energy development confirming that "*on-shore developments associated with off-shore renewable energy projects will be supported in principle.*"

Eryri Local Development Plan

6.2.8 The Local Development plan (LDP) in respect of the proposed works is the Eryri National Park Local Development Plan 2016 – 2031 (adopted February 2019) (ELDP).

6.2.9 The following planning policies from the ELDP are relevant to the proposed works:

- Strategic Policy A: National Park Purposes and Sustainable Development
- Strategic Policy B: Major Development
- Strategic Policy C: Spatial Development Strategy
- Strategic Policy D: Natural Environment
- Strategic Policy Ff: Historic Environment (Ff)
- Strategic Policy L: Accessibility and Transport
- Development Policy 1: General Development Principles
- Development Policy 2: Development and the Landscape
- Development Policy 3: Energy
- Development Policy 6: Sustainable Design and Materials (6)
- Development Policy 18: The Welsh Language and the Social and Cultural fabric of communities.
- Development Policy 27: Snowdonia Enterprise Zone

Supplementary Planning Guidance (SPG)

- Supplementary Planning Guidance 7 – Landscape and Seascapes of Eryri (Ref. 1-30)
- Supplementary Planning Guidance 6 – Nature Conservation and Biodiversity (Ref. 1-31)
- Supplementary Planning Guidance 3 – Planning and the Welsh Language (Ref. 1-32)

6.3 Material Considerations

Planning Policy Wales (Edition 12)

6.3.1 Planning Policy Wales (February 2024) (PPW) (Ref. 1-33) sets out the land use policies of the Welsh Government with the primary objective of ensuring that "*the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation*".

6.3.2 PPW establishes five key planning principles for the planning system, aimed at achieving the right development, in the right place (paragraph. 2.13), three of which are relevant to the proposed works

- Growing our economy in a sustainable manner – Enabling development which contributes to long-term economic wellbeing, making the best use of existing infrastructure and planning for new supporting infrastructure and services.
- Making best use of resources – Making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environment.
- Maximising environmental protection and limiting environmental impact – Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest.

6.3.3 Chapter 3 Strategic and Spatial Choices expands on the benefits of effective strategic placemaking, including paragraph 3.61, which provides a "*need for supporting infrastructure that is "adequate and efficient", including electricity infrastructure which is recognised as being "crucial for economic, social and environmental sustainability".*

6.3.4 In Chapter 5 Productive and Enterprising Places, the economic components of placemaking are covered. Paragraph 5.7.2 recognises that for future demand to be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. It is acknowledged in paragraph 5.7.7 that to achieve overall commitments to tackling climate change the planning system should *"integrate development with the provision of additional electricity grid network infrastructure*".

6.3.5 Para. 5.7.8 identifies that an integrated approach should be adopted towards planning for energy developments and additional electricity grid network infrastructure to fulfil the Welsh Government's renewable and low carbon ambitions. It is recognised that additional electricity grid network infrastructure will be needed to support new energy generating developments more generally.

6.3.6 The Welsh Government's position on new power lines is outlined in para. 5.7.9. which states that they should not be laid underground. However, para. 5.7.9 acknowledges that a balanced view should be taken in this regard, with consideration of the cost of underground that could render the otherwise acceptable projects unviable. Where undergrounding is not possible, proactive engagement with energy companies and the public to mitigate visual impacts of new lines should take place.

6.3.7 Para. 5.9.10 states that *"Planning authorities should plan positively for grid infrastructure"*, with appropriate grid developments being supported. New development plans should facilitate grid infrastructure required to support renewable and low carbon energy. Planning authorities should support appropriate grid developments, regardless of if they are located within their authority.

6.3.8 Chapter 6 Distinctive and Natural Places covers the environmental and cultural components of placemaking and provides in-depth guidance relating to a wide range of environmental topics including but not limited to the historic environment, landscape, biodiversity and ecology, water environmental and air quality.

Technical Advice Notes

6.3.9 PPW is supplemented by topic-based Technical Advice Notes (TANs), of which there are 21 in total. The TANs provide detailed planning advice and are material considerations in

the determination of planning application in Wales. The following TANs are of relevance to the proposed works:

- Technical Advice Note (TAN) 5: nature conservation and planning (2009) (Ref. 1-34).
- Technical Advice Note (TAN) 6: Sustainable rural communities (2010) (Ref. 1-35)
- Technical Advice Note (TAN) 11: Noise (1997) (Ref. 1-36)
- Technical Advice Note (TAN) 12: Design (2016) (Ref. 1-37)
- Technical Advice Note (TAN) 15: development, flooding and coastal erosion (2025 (Ref. 1-38)
- Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) (Ref. 1-39)
- Technical Advice Note (TAN) 23: Economic Development (Ref. 1-40)
- Technical Advice Note (TAN) 24: The historic environment (2017) (Ref. 1-41)

National Policy Statement EN-1

6.3.10 The Overarching National Policy Statement (NPS) for Energy (EN-1) (Ref. 1-42), published by the Department for Energy Security and Net Zero (DESNZ) and came into effect in January 2024. NPS EN-1 sets out national policy for energy infrastructure, including *"the electricity transmission and distribution system"*. It emphasises the need for new energy projects that will contribute towards a secure, diverse and affordable energy supply.

6.3.11 Paragraph 1.4.2 states that *"…energy policy is generally a matter reserved to the UK Ministers and this NPS may therefore be a relevant consideration in planning decisions in Wales and Scotland."*

6.3.12 In view of this, both NPS EN-1 and the National Policy Statement for Electricity Networks Infrastructure (EN-5), which also came into effect in January 2024, may be material considerations in respect of the proposed works.

6.3.13 Paragraph 3.2.6 to 3.2.8 of NPS EN-1 establishes the need for the types of infrastructure covered by EN-1. These paragraphs set out that the Secretary of State has determined that substantial weight should be given to this need when considering applications. Paragraph 3.3.65 adds that *"there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives"*. In addition, paragraph 3.3.68 acknowledges that *"the volume of onshore reinforcement works needed to meet decarbonisation targets is substantial"*.

6.3.14 Paragraphs 3.3.62 and 4.2.4 confirm that there *"is critical national priority (CNP) for the provision of nationally significant low carbon infrastructure"*. Para. 4.2.5 confirms that all power lines in the scope of the NPS EN-5 (Ref. 1-43), including network reinforcement and upgrade works are a CNP. Paragraphs 4.2.15 confirms that where residual non-Habitat Regulations Assessment (HRA) or non – Marine Conservation Zone (MCZ) impacts remain after the mitigation hierarchy has been applied, that these residual impacts *"are unlikely to outweigh the urgent need"*. It is only in all but the *"most exceptional circumstances"* that consent will be refused.

6.3.15 Paragraph 4.11.3 sets out the government's acceleration of the development of the grid network to facilitate the UK's net zero energy generation development and transmission.

6.3.16 Good design is a key consideration in the development of renewable energy infrastructure, with para. 4.7.2 outlining that energy projects expected to produce infrastructure sensitive to place. Paragraph 4.7.2 also highlights that the government acknowledge the limitations that an Applicant may have on the physical appearance of energy infrastructure. This is furthered by paragraph 4.7.6 which states "*the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure".*

National Policy Statement EN-5

6.3.17 Paragraph 1.1.1 of EN-5 explains that an increased capacity in the UK's electricity network is fundamental to ensure the security and reliability of the current and future energy supply, to provide the infrastructure necessary to facilitate the transition to net zero.

6.3.18 Paragraph. 1.1.2 goes on to explain that a large amount of this new electricity network infrastructure is required in the near term, to support the Government's ambition of deploying up to 50 GW of offshore wind capacity by 2030. Para 1.1.3 emphasises, that without a reliable and secure electricity network, this ambition cannot be achieved.

7. Planning Appraisal

7.1 Introduction

7.1.1 This section presents an appraisal of the proposed works' compliance with the development plan as per S38 (6) of the Planning and Compulsory Purchase Act.

7.2 Principle of Development

7.2.1 There is strong national policy support for strengthening and reinforcing the electricity network in Wales, particularly to support the transition to net zero. The proposed works accord with Future Wales Policy 17 as they are required to increase the capacity of the electricity transmission network, of which Wales has international commitments to "*generate 70% of consumed electricity by renewable means by 2030".* Policy 17 also explicitly earmarks the need for new, strategic grid infrastructure. The proposed works will play a key role in supporting the development of innovative and emerging technologies to help decarbonise Wales in rural areas, in accordance with Future Wales Policy 5. In line with Future Wales Policy 24, the proposed works is an onshore development that will connect offshore renewable energy projects.

7.2.2 The proposed works will support the continued expansion of renewable energy generation in the UK, in particular, the growth of the offshore wind sector in Wales. In turn, this will contribute to the decarbonisation of the power sector as renewables increasingly replace higher carbon generation sources. This aligns with the UK Government's goal of achieving a fossil fuel independent electricity system by 2035 and the Welsh Government's aims of reducing greenhouse gas (GHG) emissions to Net Zero by 2050, with the ambition of collectively reaching net zero by 2030 in the public sector. Local policy also reiterates the need for the provision of service and utilities infrastructure, with Development Policy 1 of the ELDP stating that appropriate services and infrastructure can be provided without compromising the quality and character of the National Park. ELDP Strategic Policy C sets out that spatial development within the National Park will be based on a hierarchy and development in the countryside would include economic development as part of Snowdonia Enterprise Allocation in accordance with Development Policy 27.

7.2.3 Development Policy 27, Part C relates to Trawsfynydd, and it states that uses for low carbon energy businesses and energy generation technologies, would be accepted and Strategic Policy A, criterion vi encourages developments to make efficient use of land and infrastructure and criterion xiii, which encourages development of previously developed land in a sustainable location.

7.2.4 The proposed works is in the existing operational Trawsfynydd substation, where adequate infrastructure capacity exists to support the proposed works, so the principle of development has already been established due to the presence of existing electricity infrastructure and would make effective use of land, in accordance with Strategic Policy A.

7.2.5 The proposed works would support low carbon energy business and energy generation technology and would encourage economic growth in the countryside within the Trawsfynydd part of the Snowdonia Enterprise Zone. The proposed works have also

considered environmental and planning considerations as detailed in this Planning Statement. Therefore, it is demonstrated that the principle of development is supported by local policy.

7.2.6 PPW paragraph 3.61 recognises the need for electricity infrastructure such as the proposed works as being crucial for economic, social and environmental sustainability. Paragraph 3.7 sets out that developments should seek to maximise energy efficiency and the efficient use of land and other resources and minimise the use of non-renewable resources. The need for significant investment in energy transmission and distribution infrastructure is also highlighted in paragraph 5.7.2, while paragraph 5.7.7 outlines that commitments to climate change will only be achieved if new energy development is integrated with the provision of additional electricity grid network infrastructure. TAN 6 and TAN 23 support development that is intended to enhance infrastructure networks in rural areas, as the proposed works would do. NPS EN-1 recognises that substantial weight should be given to the need for energy infrastructure such as that of the proposed works, and that it falls under CNP infrastructure where there is a presumption to grant consent.

7.2.7 In conclusion, the principle of the proposed works is in accordance with Development Policies 1 and 27 and Strategic Policy A of the ELDP, Policies 5, 17 and 24 of Future Wales and PPW and NPS EN-1. There is significant need for the proposed works and the principle of developing and upgrading transmission networks to facilitate the connection of 50 GW of offshore wind by 2030, and upgrading grid capacity is supported by both national policy (including the National Plan) and local policy.

7.3 Landscape and Visual Amenity

7.3.1 A Landscape and Visual Impact Assessment (LVIA) of the proposed works has been undertaken and is set out in **Chapter 4: Landscape and Visual Amenity** of **ES Volume 5**.

7.3.2 Development Policy 2 of the ELDP requires the scale and design of new development to respect and conserve the character, qualities and views of the landscape, particularly in regard to the protection of The Snowdonia Dark Skies Reserve.

7.3.3 In PPW, section 6.3 sets out that "*All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places*". The importance of local landscapes is outlined in paragraph 6.3.12 which requires planning authorities to "*provide for the conservation and, where appropriate, enhancement of local landscapes*".

7.3.4 SPG - Landscapes and Seascapes of Eryri, provides guidance and an evidence base to support the policies in the Eryri Local Plan.

7.3.5 In terms of visual receptors, residential settlement is limited to a small number of scattered farms and individual properties in the vicinity of the proposed works site, with the closest being approximately 315 m north of the proposed works site. The primary transport route in the vicinity of the proposed works site is the A470, off which is the access to the Site and a series of local and minor roads that connect the scattered farms and individual properties. There are four Public Rights of Way (PRoWs) within 500 m of the Site: Maentwrog No 18 footpath, 50 m north; Maentwrog No 5 footpath; Maentwrog No 21 footpath and Maentwrog No 5 bridleway; but none have direct access across the Site.

The Trawsfynydd to Gellilydan cycle route is under development and will connect into the NCN Route 82 Bangor to Fishguard when complete. However, this route would run approximately 300 m west of the proposed works site at its closest.

7.3.6 The scope of the LVIA is presented in Chapter 4 of the Environmental Statement. The results of the LVIA demonstrate that the majority of the potential impacts on landscape character and visual amenity would relate to construction operations. However, these impacts would be temporary, with the impacts limited and localised. Construction compounds would be carefully sited to minimise potential effects, with any areas disturbed reinstated to result in little or no discernible change. The proposed works would be contained within the existing Trawsfynydd substation and therefore, any effects on landscape character would be barely discernible.

7.3.7 In relation to the Snowdonia Dark Skies Reserve, lighting would be limited to specific tasks and low-level lighting to access walkways to ensure safe pedestrian passage from the site welfare facilities to the work face. Low level lighting would also be required for the construction site establishment and compound. However, any works would be carried out during daylight hours only, or where works are started during daylight hours and cannot be halted once started. There will be no additional permanent light sources. An assessment of the Dark Skies designation has been scoped out of assessments included in the ES. Additionally, as the proposed works site is an existing substation, there is already a degree of existing lighting which is screened from the surrounding area by existing tress and vegetation and any proposed lighting during construction would not significantly increase the levels beyond what is already present on proposed works site.

7.3.8 In conclusion, the LVIA demonstrates that although there is potential for localised landscape and visual effects during construction, the limited and temporary nature of these elements are unlikely to result in any significant effects on the identified landscape designations, landscape character and visual receptors. During operation, following completion of construction and reinstatement, little or no discernible change and therefore no significant effects are anticipated.

7.3.9 The proposed works would occur within the existing Trawsfynydd substation, therefore effects on landscape character and visual amenity would be barely discernible as they would occur in the context of existing Trawsfynydd substation infrastructure.

7.3.10 All assessment of landscape and visual effects was scoped out due to the limited and temporary nature of potential change, with no significant effects on landscape character or on visual amenity likely to occur.

7.4 Design

7.4.1 ELDP Strategic Policy A criterion ‘x’ requires developments to have good quality, sustainable design, with Development Policy 1 criterion ‘iv’ supporting this and requiring development to reflect a good sustainable design standard and use materials that are sympathetic to enhance their surroundings. Development Policy 6 requires appropriate materials and sustainable design, and that all forms of new built development will attain at least the national sustainable building requirements, with any new buildings having natural Welsh mineral slate roofing. Future Wales Policy 17 requires the designing of new strategic grid infrastructure to minimise visual impact on nearby communities.

7.4.2 Development Policy 27 states that for development in the Snowdonia Enterprise Zone, the design should be coherent and of a high standard and respond positively to sensitive landscape and visual setting and Special Qualities of the National Park. The siting, height,

form and scale, materials and use colour in the development should assist with the landscape integration and minimises significant adverse effects upon the landscape character and visual amenity.

7.4.3 NPS EN-1 recognises that "*the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure*", emphasising the need to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation.

7.4.4 The proposed works will respect the context of the proposed works site and its place in the local landscape as it comprises additional electrical infrastructure, such as the shunt reactor, in an existing substation. There is limited choice in terms of the design of the proposed works as this infrastructure must be functional and serve a purpose but would be reflective of the existing infrastructure on the proposed works site. The siting minimises impacts on nearby settlements as it is in an already established substation. The materials would be appropriate for the proposed works and would be similar to the existing electrical infrastructure on Site. There would be no new buildings, so there would be no requirement for Welsh slate roofing. The proposed works is in accordance with ELDP Strategic Policy 1 and Development Policies 1 and 6, Future Wales Policy 17 and NPS EN-1.

7.5 Ecology and Nature Conservation

7.5.1 ELDP highlights the need for the protection and enhancement of the natural environment and the importance of protecting biodiversity. Development Policy 1 requires that "…*development will not have an unacceptable adverse impact on the characteristic biodiversity of Snowdonia, particularly habitats and species protected under national and European legislation."* Furthermore, Strategic Policy D states that *"…biodiversity… of Snowdonia National Park will be protected from inappropriate development. Where development is deemed acceptable, developers will be expected to ensure that the natural environment is protected and enhanced."* This policy further states that development should not adversely affect the National Park's biodiversity resources, including designated sites as well as wider biodiversity resources (e.g. outside of designated sites).

7.5.2 Section 6.4 Biodiversity and Ecological Networks of PPW also requires proposals to deliver a net benefit in biodiversity, and this is supported by TAN 5: Nature conservation and planning.

7.5.3 The Eryri SPG 6 – Nature Conservation and Biodiversity provides supporting information for the above Eryri polices. This SPG provides information on the Eryri Local Biodiversity Action Plan (LBAP). The LBAP identifies the most important habitats and species found in Eryri and the SPG states that the information found in the LBAP can be a material consideration for planning decision due to the aim to protect native species.

7.5.4 An assessment of the likely significant effects on ecologically sensitive receptors is presented in **Chapter 5: Ecology and Nature and Conservation** of **ES Volume 5 Trawsfynydd Works**. This concludes that no significant effects would occur during construction, operation and maintenance of the proposed works.

7.5.5 There are six international statutory designated sites within 10 km of the Site, and a further 15 national statutory designated sites within 5 km. The closest part of both is approximately 1.08 km north of the Site.

7.5.6 The proposed works would be contained within the existing hardstanding area of the Trawsfynydd substation and incorporate suitably sized buffers from nearby habitats.

Mitigation measures will be detailed in the CEMP and will be implemented throughout construction. There would be no significant effects on statutory or non-statutory designated sites of nature conservation, notable habitats or protected or notable species. The proposed works would accord with Strategic Policy D and Development Policy 1 of the Eryri Local Plan, SPG6 and national policies relating to biodiversity.

Net Benefits for Biodiversity

7.5.7 The Environment (Wales) Act 2016 Part 1 Section 6: 'Biodiversity and resilience or ecosystems duty' states that public authorities "*must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing, promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions*".

7.5.8 Future Wales Policy 9: 'Resilient Ecological Networks and Green Infrastructure' sets out that "*action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment*."

7.5.9 PPW expands on this by stating that the "*planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems. Recognising that development needs to take place and some biodiversity may be impacted, the planning system should ensure that…there is a net benefit for biodiversity…"*

7.5.10 PPW also states that "*all development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed)"*

7.5.11 PPW TAN 5: 'nature conservation and planning' sets out the key principles of positive planning for nature conservation, and states that the town and country planning system in Wales should "…*look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally."*

7.5.12 A Net Benefit for Biodiversity (NBB) and Green Infrastructure (GI) Statement has been prepared and will be submitted as part of the planning application. The NBB and GI statement has been produced in response to the approach to delivering NBB and GI in Wales, as mandated in Planning Policy Wales 12. This combined NBB and GI Statement demonstrates how the proposed works have applied the stepwise approach and DECCA framework, through habitat avoidance, mitigation, creation and/or enhancement to reduce the permanent and temporary impact of habitats within the planning application boundary and provide proportionate compensation where achievable. Mitigation measures are included in the CEMP to reduce the potential effects of on-site important ecological features. A Landscape and Visual Impact Assessment (LVIA) of the proposed works has been undertaken and is set out in **Chapter 4: Landscape and Visual Amenity** of **ES Volume 5: Trawsfynydd Works**. Both reports should be read in conjunction with the NBB and GI Statement.

7.5.13 The proposed works are confined to the existing hard standing area of the Trawsfynydd Substation, with the exception of a small area (approximately 180 m²) of self-seeded, semi-natural broadleaved woodland. Due to the fixed location and operational requirements of the proposed infrastructure, avoidance of this area is not feasible without compromising the viability of the works. While the woodland contributes to local green infrastructure, its ecological value is limited due to its unmanaged and fragmented

condition, lack of structural diversity, and absence of notable species or connectivity to wider ecological networks. In accordance with the stepwise approach, proportionate measures have been incorporated to address potential species displacement, through species-specific enhancement (comprising installation of bat and bird boxes).

7.5.14 In conclusion, in line with the species-specific enhancements set out within the NBB and Green Infrastructure Statement, the proposed works would result in a net biodiversity benefit and would accord with the requirements of the Environment (Wales) Act 2016, FW Policy 9 and the PPW.

7.6 Historic Environment

7.6.1 Strategic policy F of the Eryri Local Plan highlights the importance of the historic landscape and setting of the National Park. This policy states that *"the historic landscape, heritage assets and cultural heritage of Snowdonia National Park will be conserved and enhanced due to their contribution to the character and 'Special Qualities' of the National Park. Particular protection will be given to the following…historic… assets and where appropriate, their settings: … Historic landscapes, parks and gardens."*

7.6.2 Para. 6.15 of PPW requires the planning system to take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment. Para. 6.16 of the PPW lists the Welsh Government's specific objectives for the historic environment.

7.6.3 **Chapter 6: Historic Environment, ES Volume 5 Trawsfynydd Works** provides an assessment of the potential effects of the proposed works on heritage and archaeological assets.

7.6.4 The Cultural Heritage Desk-based Assessment (DBA) sets out known assets and assesses the potential for unknown heritage assets to be present within the Site. The DBA outlines that there are no historic assets to be scoped into the assessment and no additional assessment in **Chapter 6 of ES Volume 5 Trawsfynydd Works** would be required. The DBA also sets out that there would not be any alteration to the ability to appreciate the historic landscape of the Site, due to the proposed works either being below ground or matching in scale and form with the existing structures of the substation.

7.6.5 The DBA sets out the significance of designated historic assets and notes there are several high value assets within 3 km of the Site. However, the DBA notes that there would be no intervisibility between identified scheduled monuments, and conservation areas. The Grade II* registered historic gardens Dragon Square (approximately 80 m from the Site) and Dame Sylvia Crowne Garden Registered Park and Garden (approximately 200 m from the Site), both in the former nuclear power station site, would not be directly impacted by the proposed works.

7.6.6 Table 6-2 of the ES summarises the potential Historic Environment receptors that have been reviewed. All assessment of historic environment effects has been scoped out of the ES due to there being no intervisibility between either Scheduled Monuments, and Listed Buildings and the proposed works, and, as the proposed works are in the existing Trawsfynydd substation, any buried archaeological remains would have already been removed. Therefore, the proposed works would not result in adverse harm to the historic environment and would accord with Strategic policy Ff of the Eryri Local Plan and national policies relating to the historic environment.

7.7 Ground Conditions

7.7.1 **Chapter 7: Geology, Hydrogeology, Land Use and Agriculture** of **ES Volume 5 Trawsfynydd Works** provides an assessment of likely significant effects on ground conditions that could arise from the construction, operation and maintenance of the proposed works.

7.7.2 Development Policy 1 of the ELDP requires development to ensure that it does not cause significant harm to the environment, neighbouring residential amenity or amenity of the National Park by way of pollution or waste production.

7.7.3 PPW seeks to ensure both land contamination and water quality are considered in proposals for development and remedial measures implemented where appropriate.

7.7.4 During construction, mitigation measures would be implemented to minimise land contamination and adverse effects on geology and hydrogeology. A Construction Environmental Management Plan (CEMP) will be developed and implemented to further mitigate any potential effects.

7.7.5 The proposed works site would be reinstated with any ground material that has been removed for construction where practicable and will continue to be covered by the Trawsfynydd substation and existing internal roads. There will be little potential for any users to be exposed to contamination once operational. The effects have been summarised in Table 7-7 of **Chapter 7 of ES Volume 5 Trawsfynydd Works.**

7.7.6 Overall, it is demonstrated that the proposed works would not have significant impacts on ground conditions within the proposed works site as the mitigation measures set out in **ES Volume 5 Trawsfynydd Works** are expected to prevent any significant effects during construction, operation and maintenance. Therefore, the proposed works would accord with Development Policy 1 of the ELDP and national policy relating to geology, hydrogeology, land use and agriculture as well as the material consideration of the PPW.

7.8 Flood Risk and Drainage

7.8.1 Policy 8: Flooding of Future Wales aims to prioritise development in places that are not at flood risk and states *"it must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated"*.

7.8.2 The ELDP furthers the aims to conserve the water environment. Strategic Policy A states that development in the National Park needs to consider the conservation of the quality and quantity of natural resources including water, to deliver sustainable development. In terms of flooding, Strategic Policy A states that *"…preventing inappropriate development in areas which are at risk from flooding or contribute to the risk of flooding…".* Additionally, Development Policy 1 states that development will only be permitted where "*…the development would not have an unacceptable adverse impact …on…surface and ground water (quality, quantity or ecology)"* and *"…the risks, and consequences of flooding can be managed on and off site to an acceptable level…".*

7.8.3 Section 6.6 of PPW takes water and flood risk into account when planning for development. Paragraph 6.6.7 requires that water resources and quality are "taken into account from an early stage in the process of identifying land for development and redevelopment", while paragraph 6.6.22 states *"surface water flooding will affect choice of location and the layout and design of schemes, and these factors should be considered at an early stage in formulating development proposals".*

7.8.4 TAN 15 supplements the policy set out in PPW in relation to development and flooding. Section 9 of TAN15 sets out the vulnerability categories for different types of development, with the development categorised as “less vulnerable development” in TAN 15. Section 11 of TAN 15 assesses consequences of flooding, with paragraph 11.3 stating *“Whether a development should proceed or not will depend upon whether the consequences of flooding of that development can be managed down to a level which is acceptable for the nature/type of development being proposed”*.

7.8.5 Chapter 8 of the ES details the potential Water Quality, Resources and Flood Risk effects that could arise from the construction, operation and maintenance of the proposed works. Effects on nearby watercourses and Llyn Trawsfynydd were scoped out of the assessment.

7.8.6 The proposed works site and wider Trawsfynydd substation is bounded to the north and east by networks of unnamed small watercourses. The closest known watercourse to the proposed works site is the tributary of Afon Dwyryd, the Afon Tafarn-helyg, which runs approximately 40 m to the east of the proposed works site towards Llyn Trawsfynydd, and other unnamed tributaries are approximately 12 m from the proposed works site. The nearest designated main river is the Afon Prysor, which flows through Llyn Trawsfynydd, but this is approximately 1.8 km west of the proposed works site. The proposed works site lies outside areas of mapped fluvial or tidal flooding and is not in the vicinity of a Main River and lies predominantly outside the mapped areas of flooding from small watercourses and surface water flooding, with a small expanse of Flood Zone 2 extending along the existing access road/within existing transformer areas. This is not anticipated to significantly impact the proposed works. The Site lies in the mapped reservoir flood extents, however flood risk from this source is very low as there are regulations on Llyn Trawsfynydd to mitigate flood risk that are secured by the Reservoirs Act 1979 (Ref. 1-44). It is assumed there will be no increase in the impermeable area as a result of the proposed works and an operational drainage system is in place at the existing Trawsfynydd substation.

7.8.7 The proposed works would utilise a suitable existing drainage system to minimise flood risk, and a CEMP will ensure the implementation of mitigation measures during construction activities. The proposed works would accord with Strategic Policy A and Development Policy 1 of Eryri Local Plan and relevant national policy relating to water quality, resources and flood risk.

7.9 Traffic and Transport

7.9.1 Strategic Policy L of the Eryri Local Plan lists criteria that are focussed on improving access to local facilities and reducing the need to travel especially by private car.

7.9.2 **Chapter 9** of **ES Volume 5 Trawsfynydd Works** presents an assessment of the likely Traffic and Transport effects that could arise from the construction, operation and maintenance of the proposed works.

7.9.3 It is recognised that the proposed works would have limited opportunities to support sustainable travel, due to the limited availability of public transport routes and accessible footpaths. The most reliable route would be the strategic and local road network, with the strategic network consisting of the A470, which runs east of the proposed works site, providing the direct and primary access to the proposed works site. Therefore, it is assumed that construction and operational staff will predominantly travel by private vehicles, with car-sharing being encouraged by the contractor during peak construction

stages. It is assumed that approximately 50% of the workforce would participate in car-sharing, based on similar infrastructure projects in the wider area.

7.9.4 It is expected that there would be an increase in traffic during construction, but this would be primarily along the access road towards the proposed works site, as it is expected that 140 construction workers vehicles would need to enter and leave the proposed works site on an average day. It is anticipated that there would be a total of up to eight Abnormal Indivisible Load movements associated with the delivery of the shunt reactor and cables to the Trawsfynydd works site which will follow a specific route. There would be minimal increases in vehicle movements along other routes to and from the proposed works site, with increases along the A487 and A470 being below 5%. For HGVs, there would be an average of 16 HGVs entering and leaving the proposed works site on an average day, which would be an increase in traffic of 256%. However, this impact would be temporary and managed through embedded mitigation measures and the measures in the Construction Traffic Management Plan (CTMP). There would be one journey of an abnormal indivisible load (AIL) to and from the proposed works site for the delivery of the shunt reactor and this would be planned and coordinated to minimise impact on traffic.

7.9.5 There would be no change to the existing operation situation, so there is no requirement for additional staff and no subsequent increase in vehicle movements. The operation/maintenance phases are anticipated to create much less traffic than during the construction phase and remain similar in magnitude to current levels. Therefore, operational effects were scoped out the assessment.

7.9.6 The proposed works have been designed where practicable to avoid and reduce impacts and effects on Traffic and Transport by having embedded mitigation measures in the proposed works design. A detailed breakdown of embedded mitigation measures throughout the construction, operation and maintenance phases of development have been provided in section 9.10 of **Chapter 9** of **ES Volume 5 Trawsfynydd Works**.

7.9.7 Overall, it is expected that the proposed works would not result in significant increases in traffic during operation and maintenance and any increase during construction would be temporary and managed during embedded mitigation measures and the CTMP. As such, no significant effects are expected, and no further mitigation required. Therefore, the proposed works would accord with Development Policy L of the ELDP and the PPW and relevant national policy relating to traffic and transport.

7.10 Amenity

7.10.1 Development Policy 1, criteria xi, xii and xiii of the ELDP identify that development will only be permitted where there is no unacceptable impact on amenity, including air quality and noise. Related to this, PPW places substantial emphasis on the improvement of well-being in all its aspects as defined by the statutory well-being goals set out in the Future Generations Act.

Air Quality and Emissions

7.10.2 **Chapter 10: Air Quality and Emissions** of the **ES Volume 5 Trawsfynydd Works** details the likely Air Quality and Emissions effects that could arise from the construction, operation and maintenance of the Proposed Development Works.

7.10.3 The majority of land surrounding the Site is agricultural and to the west is the decommissioned nuclear power plant.

7.10.4 There are no residential dwellings within 250 m of the Site, but there are recreational activities which would lie within 200 m of the Site. However, it is not expected that there would be significant effects on these receptors or to the air quality of the local area.

Noise and Vibration

7.10.5 **Chapter 11: Noise and Vibration** of the **ES Volume 5 Trawsfynydd Works** provides an assessment of the potential noise impacts of the proposed works during construction, operation and maintenance of the proposed works.

7.10.6 There are no receptors that would be sensitive to noise within 300 m of the Site. Whilst there are PRoWs within 300 m of the proposed works site, construction noise would only affect the PRoW users for a limited amount of time when near a noise source. As the PRoWs experience a range of noise impacts from ambient noise and noise from roads, the proposed works would not result in a significant change in noise levels experienced by the PRoW users to an extent that would be considered a material change.

7.10.7 The proposed works would not result in any significant impact on noise and vibration in the immediate local area and mitigation measures would help to reduce any impacts during construction, operation and maintenance.

7.10.8 For the reasons summarised above, the proposed works would accord with Development Policy 1 of the Eryri Local Plan and the objectives of PPW in respect of amenity.

7.11 Cumulative Effects

7.11.1 Consideration of the cumulative impact of a development is required in National Policy, including PPW. PPW emphasises the need for the potential cumulative effects of proposals to be considered and outlines how these will be a consideration in making planning decisions. Para. 5.9.8 of PPW states that planning authorities should "take into account the cumulative impacts of renewable and low carbon energy development and their associated infrastructure".

7.11.2 **Chapter 5 of ES Volume 7: The Project and Cumulative Effects** does not identify any additional developments within the 2km study area. No significant adverse cumulative effects are anticipated.

7.12 Welsh Language

7.12.1 ELDP Development Policy 18 sets out that in determining all planning applications within the National Park, the needs and interests of the Welsh language will be taken into account. This would be achieved through:

i. "*Supporting development which maintains or enhances the integrity of the Welsh language…*

iv. *…encouraging all signage by …commercial and business companies to be bilingual or in Welsh only to protect and promote the distinctive cultural amenity of the National Park*

v. *Encouraging the use of Welsh place names for new developments…"*

7.12.2 TAN 20 recognises the need for creating favourable circumstances which encourage the number of Welsh speakers, and that the planning system has a role play through enabling conditions which allow sustainable communities to thrive. Paragraph 3.1.2 sets out that

the Welsh language is a material consideration in the determination of planning applications. However, it should be noted that in paragraph 3.1.2 of TAN 20, under Section 70(2) TCPA, there is no "*additional weight given to the Welsh language above any other material considerations and that planning permission must be based on planning grounds only and be reasonable*".

7.12.3 In accordance with ELDP Development Policy 18 and SPG 3, a Community and Linguistics Statement (CLS) has been produced as part of the planning application documents. The CLS demonstrates that the proposed works will not lead to adverse impacts on the character and language balance of local communities. Despite no adverse impacts, it is expected that measures will be implemented to ensure that use of the Welsh language is preserved. Measures may include the use of bi-lingual signage on affected road routes and PRoW, and where possible, ensuring local people are employed who may speak or have knowledge of the Welsh language. Additionally, as identified within the Key Considerations section of the CLS, the Project could provide resources for workers, such as key phrases list, to help those who cannot speak Welsh.

7.12.4 Further consultation with stakeholders will continue, with any information being provided to stakeholders in both Welsh and English and any in person events would have a Welsh speaker present. This will ensure language requirements of the local community are catered for and satisfy the standards of national and local policy in relation to the Welsh language.

7.12.5 With the measures mentioned above and in the CLS in place, the protection and enhancement of the Welsh language during the proposed works can be achieved in line with local and national policy.

8. Planning Balance and Conclusion

8.1.1 This Planning Statement has been prepared alongside a suite of documents that form part of an application being made by the Applicant for full planning permission for installation of new underground cables, installation a shunt reactor and a new gantry.

8.1.2 This planning application is required for development at Trawsfynydd substation and is necessary to support the wider Pentir to Trawsfynydd Reinforcement Project. The Project is a transmission upgrade scheme to increase the capacity of the network between Pentir and Trawsfynydd substations in North West Wales. The Project is part of the wider network transmission upgrades required to facilitate the connection of 50 GW of offshore wind by 2030.

8.1.3 It is important to maintain and upgrade the existing network as some components are now several decades old, having been installed in the 1960s, and are coming to the end of their operational life. Regardless of their age, however, some of the components require updating to meet wider Project needs.

8.1.4 The replacement of the cables is essential to enable an increase to the network capacity that is required to contribute towards the Welsh Government renewable energy targets summarised above. There is strong national policy support for strengthening and reinforcing the electricity network in Wales, particularly to support the transition to net zero. New, strategic grid infrastructure is explicitly earmarked by the Welsh Government, along with a commitment to work with stakeholders, including National Grid, to transition to a multi-vector grid network and *"reduce the barriers to the implementation of new grid infrastructure"*.

8.1.5 Planning Policy for Wales outlines in chapter 5 that an effective electricity grid network is required to fulfil the Welsh Government renewable and low carbon ambitions, and furthermore that additional electricity grid network infrastructure should be provided. The proposed works will reinforce the electricity network helping to meet the demand in North West Wales, including through the distribution of electricity from offshore renewable energy projects.

8.1.6 There is an identified and established need for the proposed works as set out in the Energy White Paper (2020) that outlines a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. The Welsh Government has also set ambitious targets for renewable energy and the electricity transmission network in order to decarbonise and provide energy security.

8.1.7 NESO recognises the Project as essential for the transmission of electricity in Wales. The need for the Project is elevated further by Ofgem identifying it as one of the Accelerated Strategic Transmission Investment (ASTI) projects. ASTI projects form part of a new regulatory approval and funding framework for onshore transmission projects that Ofgem sets out are required to deliver the Government's 2030 Net Zero ambitions. To help meet those ambitions, Ofgem has identified that significant upgrades to the capacity of the electricity network in North Wales are required to allow the connection of new offshore windfarms. The proposed works have been the subject of environmental surveys and assessments to identify, design out and mitigate adverse effects. The proposed works have been assessed against its compliance with policies in the Development Plan and

regard has been has to other material considerations. The appraisal in Section 7 of this Planning Statement sets out how the proposed works accord with the relevant policies for landscape, ecology, the historic environment, flood risk, water resources, traffic and transport, amenity and cumulative effects.

8.1.8 Substantial weight should be given to the urgent need for the proposed works as demonstrated in this Planning Statement, along with other associated benefits including the contribution towards a reliable, secure electricity system. The **ES Volume 5 Trawsfynydd Works** and the appraisal in this Planning Statement demonstrate that adverse impacts have been minimised with all environmental matters having neutral impacts through the inclusion of embedded mitigation and largely due to the proposed works taking place with the footprint of an existing substation comprising of existing electrical infrastructure and equipment.

8.1.9 In conclusion, there is a compelling urgent need for the proposed works and the principle of developing and upgrading transmission networks to facilitate the connection of new renewable energy generation, and upgrading grid capacity is supported by both by the Development Plan and National Policy. Further, this Planning Statement and the accompanying ES has demonstrated that there would be minimal adverse impacts with the proposed works being fully in accordance with the Development Plan. Moreover, the proposed works delivers substantial public benefits and planning permission should be granted without delay.

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