Uwchraddio'r Grid
Pentir i Drawsfynydd

The Great Grid Upgrade
Pentir to Trawsfynydd



PTNO-AEC-ZZZZ-ZZZZZZ-RPT-ES-000040

Prosiect i Atgyfnerthu'r cysylltiad rhwng Pentir a Thrawsfynydd

Pentir to Trawsfynydd Reinforcement Project

Bryncir Works: Planning Statement
November 2025

nationalgrid

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1. Introduction

1.1 Introduction

1.1.1 This Planning Statement has been prepared to accompany an application made by National Grid Electricity Transmission (plc) (NGET) ('the Applicant') for full planning permission for a new substation south of Bryncir village and associated infrastructure, and ancillary works, including a new access road from the A487 and the upgrading of an existing agricultural access track, and new underground 132 kV cables connecting to the existing Electricity Networks overhead line. ('the proposed works').

1.1.2 The proposed works are approximately 1 kilometre (km) south of Bryncir village and are required 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 County 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 proposed works are defined by the red line boundary in **Plate 3-1** and covers an area of 12.4 ha. An application for full planning permission will be submitted to Gwynedd Council ('the Council') 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 has undertaken a statutory pre-application consultation (PAC) for the proposed works. The purpose of the PAC 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 the work undertaken to date, prior to the submission of the planning application to the Council. The report of the PAC is presented in the PAC Report which accompanies the application.

1.2 Pentir to Trawsfynydd Reinforcement Project

1.2.1 The Project 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 that 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 **Plate 1-1** below.

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

- **Pentir** – Replacement of existing underground cables; installation of new cross site underground cables in the existing Pentir substation; and ancillary works.
- **Glaslyn Cables** – an extension to the existing Wern Cables Sealing End Compound (CSEC) including a new permanent access; a new Minffordd CSEC and Tunnel Head House (THH) with permanent access; the removal of the existing Garth CSEC; installation of new 400 kV cables to replace redundant 400 kilovolt (kV) and 132 kV cables; and other associated infrastructure and ancillary works..
- **Trawsfynydd** – Installation of new underground cables and cable sealing ends, shunt reactor and gantry and the widening of part of the existing access road in the fenced compound at Trawsfynydd substation and ancillary works.

1.2.4 Section 37 consent under the Electricity Act 1989 (Ref. 1-5):

- **Bryncir** – Replacement of Tower 4ZC067 and downleads into the proposed Bryncir substation. Installation of fibre optic cable.
- **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 changes to the alignment of substation compound southern western boundary fence.

1.2.5 The works contained in the Project are at locations between Pentir substation (SH 559677), approximately 4.5 km south-west of Bangor and Trawsfynydd substation (SH 691384), approximately 1.2 km south of Gellilydan in the administrative areas of Gwynedd Council and Eryri National Park Authority. The location of the Project is illustrated on **ES Figure 7.2.1**.

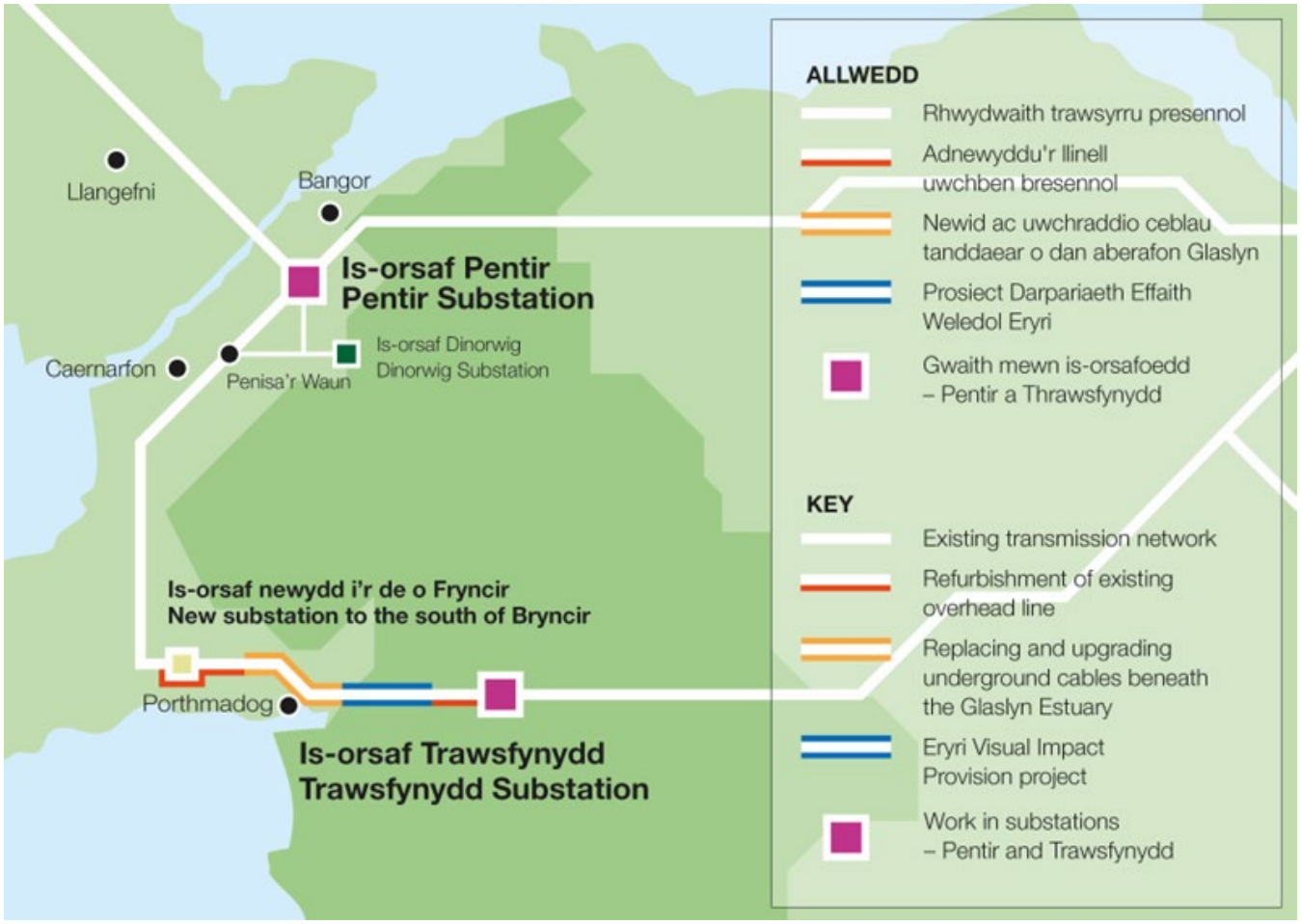


Plate 1-1 – Project schematic

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 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. 1-2) or the Electricity Act (Ref. 1-5). Development comprising the proposed works at the Pentir, Glaslyn and Trawsfynydd sites 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 to a site near Bryncir. A substation has previously been consented on this site but has not been implemented. For the purpose of the planning application, the description of development is:

"A new substation south of Bryncir village and associated infrastructure and ancillary works, including a new access road from the A487 and the upgrading of an existing agricultural access track, and new underground 132 kV cables connecting to the existing Electricity Networks overhead line."

1.3.2 An application for a Public Path Diversion Order will be made via a separate application under Section 257 TCPA 1990 to the Council, this will be determined by the Council's highways department in its capacity as local highway authority.

1.3.3 The proposed substation and its access road are similar to the existing consented proposals (reference C17/0772/36/LL). However, the permission no longer meets the needs of the Project; for example, it did not include any part of the 132 kV connection from the proposed substation to the existing SPEN DB route.

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

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") (Ref. 1-5). The Applicant has been granted a transmission licence and is bound by legal obligations, which are primarily 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 and Benefit Case – Sets out the overarching needs case for the proposed works which form part of the wider Pentir to Trawsfynydd Reinforcement (PTR) project.
- Chapter 3: Site and Surroundings – Provides a description of the proposed works site and the surrounding area, including statutory and non-statutory designations, planning policy allocations, the spatial context in relation to the Project and an overview of relevant planning history associated with the proposed works 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.
- Chapter 5: Pre-Application Consultation – Provides an overview of the pre-application consultation undertaken for the proposed works, including engagement with Gwynedd Council 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 for 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**.

Table 1-1 – Application documents

Application documents
Forms and certificates
Application form
Plans and relevant information
Site Location Plan (1:2500)
Existing Site Layout (1:500 or 1:200)
Proposed Overall Layout (1:1000)
Proposed Substation Layout (3 Sheets) (1:1000)
Proposed Elevations and Sections (1:50 and 1:100)
Proposed Substation Sections (1:100)
Indicative Drainage Strategy (1:1000)
Substation Earthworks (1:500)
Substation Cross Sections (1:250 and 1:50)
Typical Access Road Cross Sections (1:50)
Landscape Plan (1:1000 and 1:2500)
Technical documents
Planning Statement
Design and Access Statement
Pre-Application Consultation Report
Environmental Statement
Habitats Regulations Assessment
Net Benefit for Biodiversity and Green Infrastructure Statement

1.7 Environment 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. 1-6) or the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (2017 Electricity Works EIA Regs)(Ref. 1-7) 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 and none are a type of development described in Schedule 2 of the 2017 TCP EIA Regs. 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 Schedule 2, category under 10(b) due to the overall area of the development exceeding 5 hectares (ha).

1.7.3 A Screening Opinion for the Glaslyn Cables element of the Project was requested from Gwynedd Council 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 as described 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 part of Ofgem's ASTI framework. 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. The 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. 1-8) 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 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. 1-9), published in December 2020, outlined a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This was built on by the Net Zero Strategy (Ref. 1-10), 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. 1-11), published in April 2022, and the Growth Plan (Ref. 1-12) 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 UK's dependence on imported oil and gas. Powering Up Britain (Ref. 1-13), published in March 2023, set out how the government will enhance 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' (Ref. 1-14) published in December 2024 and set outs 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. 1-15) 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. 1-16) 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. 1-17) 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. 1-18) 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. 1-19), which will connect 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 requirements, which includes the following:

- Future Energy Scenarios – are developed annually by the NESO with input from industry and other stakeholders. The Scenarios represent 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 the 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. 1-20) which identifies 94 schemes that are required to meet the Government's ambition for 50 GW of offshore wind by 2030. This demonstrates 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 2023. 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, NESO published the 'Beyond 2030' (Ref. 1-21) report in March 2024, 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. This means that the Project would play an important part in achieving this as it would help to improve the Grid network and help to facilitate the connection of this additional offshore wind.

2.2.5 The 'Clean Power 2030 Action Plan: a new era of clean electricity' (Ref. 1-14) aims to tackle the three major energy challenges: the need for a secure and affordable energy supply, the creation of essential new energy 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 new substation is necessary to provide a new 132kV connection from the existing overhead cables to the wider electricity network. If the new substation is not provided it would not be possible for the electricity that is generated to be transferred to areas where it is needed. The need for this substation has also been addressed as planning permission has previously been granted for an alternative substation design and layout in this location. 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 new substation and 132 kV cables and associated infrastructure 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 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 Work 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 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. 1-19) 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:

'*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 and South West. These are the components central to the Project which include cables that were installed in the 1960's, are a limiting factor on the circuit and are now coming to the end of their operational life. The proposed works are 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 (Ref. 1-22). 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 shown in **Plate 3-1** below and is in the administrative boundary of Gwynedd Council, approximately 1 km south of Bryncir village and approximately 8.5 km north-west of Porthmadog. The proposed works site covers a total area of 12.4 ha, with the proposed substation compound being approximately 1 ha of the total proposed works site. The proposed works site is undeveloped land, with vegetation boundaries separating the proposed works site from the A487 to the north/north-west of the proposed works site and the B4411, which runs through the proposed works site. The Afon Dwyfachis approximately 125 m to the west of the proposed works site, with additional tributaries joining this river from the east. The area is punctuated by overhead lines, pylons, the B4111 and the access road to some residential and commercial properties off the B4411.

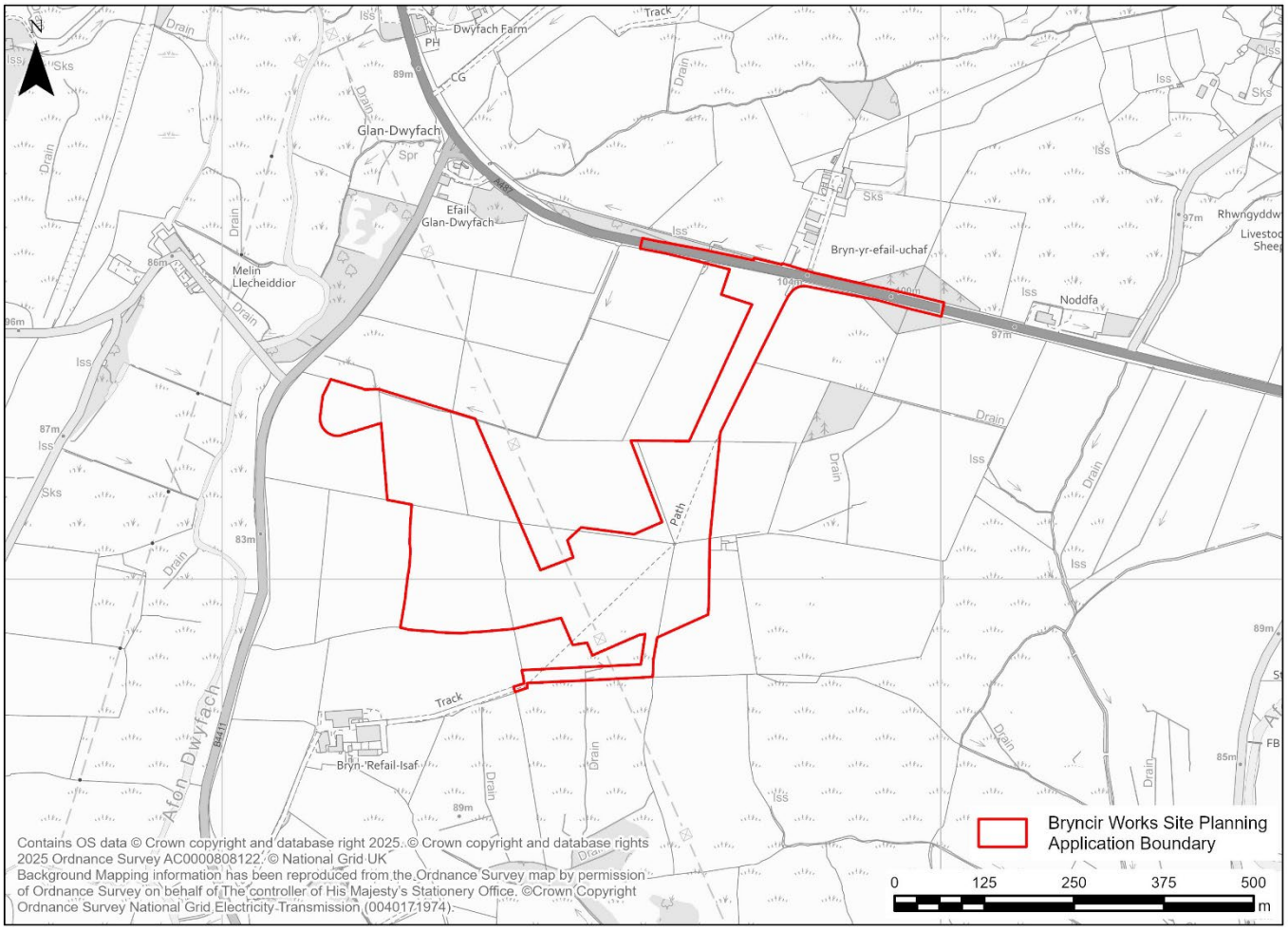


Plate 3-1 – Red line boundary

3.2 Description of the Surrounding Area

3.2.1 The proposed works site is immediately surrounded by open fields to the north, east, south and west. There is purple moor grass and rush pastures to the, east, south and northwest of the proposed works site.. The surrounding land is primarily used as agricultural land, with the ALC data identifying this area as Grade 3b, Grade 4 and Grade 5 agricultural land on the Predictive Agricultural Land Classification (ALC) Map 2 (Ref. 1-23), none of which is categorised as best and most versatile agricultural land.

3.2.2 The proposed works site is surrounded by a mix of field boundary types, predominantly dry-stone wall and post and wire fences, but with overgrown hedgerows and hedgerow trees towards the north and south. There are more managed hedgerows that line the A487 to the south as it faces the proposed works site.

3.2.3 There are a number of isolated farms and residential properties in the vicinity of the proposed works site, with the closest approximately 30 metres (m) to the west, accessed from the B4111, and approximately 40 m to the north, just north of the A487.

3.2.4 The strategic road network includes the A487 and the B4411, with the A487 providing access to the proposed works site from the north. The A487 runs in a north-south direction and connects Bangor to Gellilydan in Eryri National Park. The B4411 joins the A487 from a south-west direction and meets approximately 350 m north of the proposed works site. Public Right of Way (PRoW) 18 runs through the east of the proposed works site and PRoW 17 terminates within the proposed works site but does not extend through the proposed works site.

3.2.5 The proposed works site lies within Flood Zone 2 and Flood Zone 3, with high risk from surface water and small water course flooding.

3.2.6 The existing 132 kV DB route is approximately 600 m west of the proposed Bryncir substation and runs south-south-west from Tower 4ZC70. The overhead line runs for approximately 1.2 km before turning further west at another steel gantry support and continuing westwards.

3.3 Environmental Designations

3.3.1 The proposed works site does not lie in any statutory ecological, historic or landscape designations.

3.3.2 The proposed works site does not contain a Mineral Safeguarding Area (MSA), but there is a MSA for Sand and Gravel approximately 250 m from the west of the proposed works site, which runs from north to south. There are five further MSAs for Sand and Gravel within 5 km of the proposed works site, with the closest being approximately 1.1 km to the north-west.

3.3.3 There are no priority habitats in the proposed works site boundary, but there are four adjacent to the proposed works site to the with two to the east and 2 to the south . These priority habitats consist of purple moor grass and rush pastures.

3.3.4 There are further wildlife sites surrounding the proposed works site within 5 km. There are three candidate wildlife sites that are immediately adjacent to the proposed works site boundary and a further two within 250 m. These candidate wildlife sites are shown in relation to the proposed works site in **Plate 3-2** below.

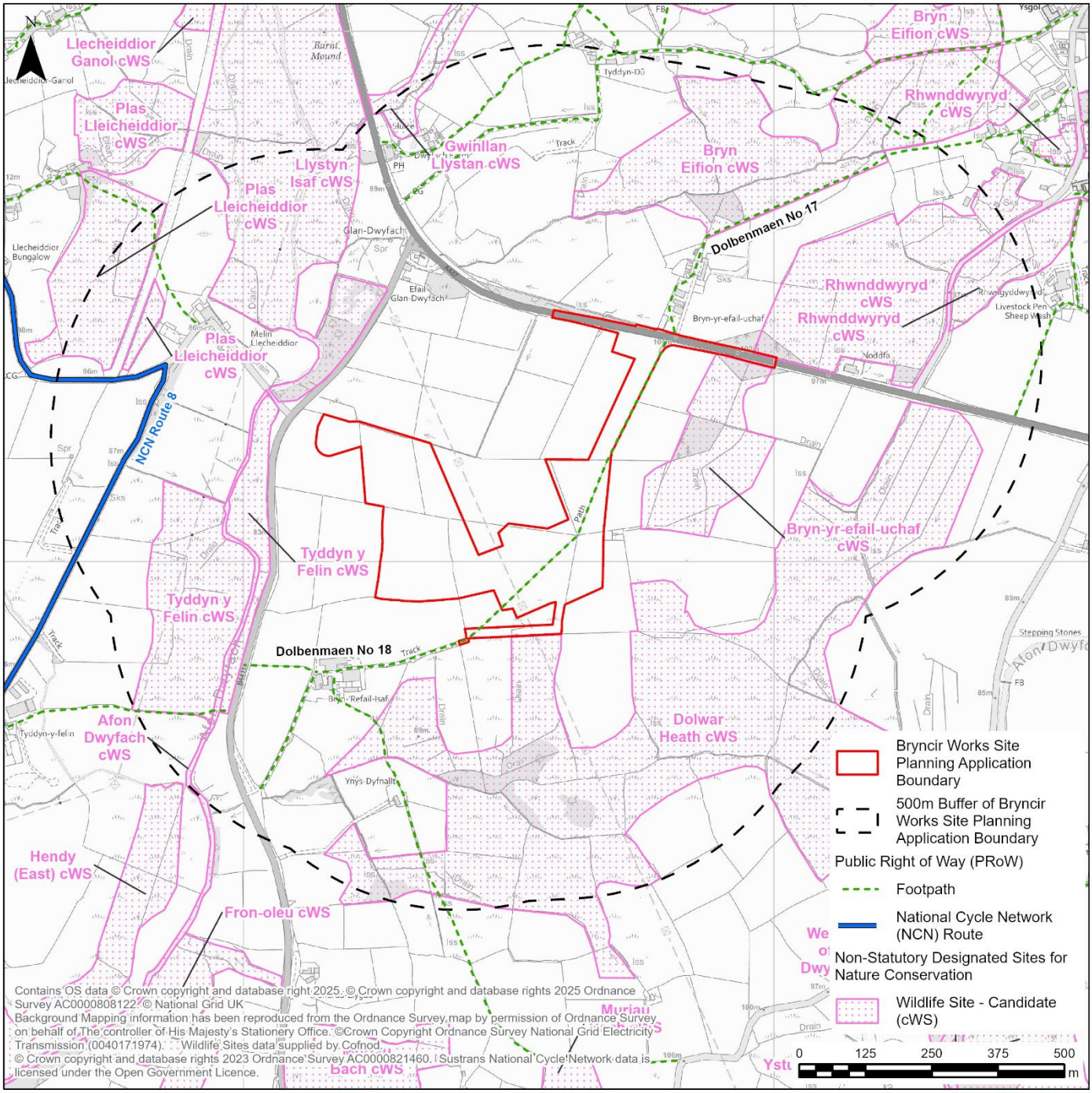


Plate 3-2 – Candidate Wildlife Sites in relation to Proposed Works Site

3.3.5 The proposed works site lies partly in Flood Zone 2 and partly in Flood Zone 3 and is at risk of both surface water and watercourse flooding. These areas cut through the centre and the eastern parts. These are shown on the Natural Resources Wales, Flood Map for Planning (Ref. 1-24).

3.3.6 One Non-Designated Heritage Asset lies in the proposed works site boundary, which is located to the south-east of the proposed works site.

3.3.7 The proposed works site lies in the Tremadoc Bay National Landscape Character Area (NCLA) and is within the local Landscape Character Areas (LCA) of LCA 10: Central Llyn, with LCA 5 Snowdonia Massif lying north-west and LCA 8 Pwllheli-Criccieth Coast to the south.

3.3.8 The proposed works site is in the Eastern Eifionydd fieldscape Historic Landscape Area, according to the Cadw Historic Assets Map (Ref. 1-25).

3.3.9 There is a Grade II listed building 111 m northwest of the proposed works site boundary.

3.3.10 There are eight Sites of Special Scientific Interest (SSSI) within 5 km of the proposed works site. These are:

- Llystyn Isaf 0.79 km north-west
- Ffiddoedd Garndolbenmaen 1.55 km north-eastCors Graianog 1.88 km north-east
- Craig-y-Garn 2.03 km north-east
- Rhosgyll Fawr 3.05 km south-west
- Tallenbont 3.39 km south
- Cors Gyfelog 4.04 km north-west
- Afon Ddu 4.66 km east

3.3.11 The Corsydd Eifionydd Fens Special Area of Conservation (SAC), which is in two parts, lies to the north of the proposed works site at approximately 1.9 km north-east of the proposed works site boundary.

3.3.12 Traditional Orchard lies approximately 1.49 km south of the proposed works site. There is an Ancient Woodland approximately 1 km to the southeast of the proposed works site and others beyond 1 km to the north, southeast and southwest.

3.3.13 Within 500 m of the proposed works site there are a further 12 PRoW:

- Public Right of Way Dolbenmaen No 19.
- Public Right of Way Llanystumdwy No 96.
- Public Right of Way Dolbenmaen No 18a.
- Public Right of Way Llanystumdwy No 62.
- Public Right of Way Dolbenmaen No 86.
- Public Right of Way Dolbenmaen No 92.
- Public Right of Way Dolbenmaen No 73.
- Public Right of Way Dolbenmaen No 74.
- Public Right of Way Dolbenmaen No 91.
- Public Right of Way Dolbenmaen No 1.
- Public Right of Way Dolbenmaen No 4.
- Public Right of Way Dolbenmaen No 17b.

3.3.14 The NCR 8 also runs within 100 m north-west of the Bryncir works site.

3.3.15 Eryri National Park is approximately 1.1 km east of the proposed works site at its closest.

3.3.16 The closest part of the Llyn Area of Outstanding Natural Beauty (AONB) is approximately 5 km to the north-west of the proposed works site.

3.3.17 There are two Special Landscape Areas (SLAs) within a 5 km radius of the proposed works site. These are Porthmadog and Tremadog Bay and the north-western fringes of Snowdonia SLA, which are approximately 4.78 km south-east and almost 5 km north of the proposed works site, respectively.

3.3.18 There is a large area of Open Access Registered Common Land 2 km north of the proposed works site and there are eight areas of Open Access Open Country land o the north and east within 5 km.

3.3.19 The Moel Hebog Uplands which are a Special Landscape Character Area (SLCA) are 1.7 km to the east of the proposed works site.

3.3.20 There are two Mineral Buffer Zones 0.9 km to the north of the proposed works site.

3.3.21 There are 14 National Monuments within 1 km of the proposed works site, with the closest being approximately 100 m to the west.

3.3.22 Dolbenmaen Conservation Area lies approximately 1.5 km to the east of the proposed works site.

3.3.23 There is one Scheduled Monument within 1 km of the proposed works site, Enclosed Hut Group approximately 1 km north, and there are several that lie within 5 km with the closest approximately 1.14 km to the north-east.

3.4 Local Planning Policy Allocations and Designations

3.4.1 As the proposed works site falls within the administrative boundary of Gwynedd Council, planning policy that is represented on the Proposals Maps of the Anglesey and Gwynedd Joint Development Plan (Ref. 1-27) ('the Local Development Plan' (LDP)) has been reviewed.

3.4.2 There is an MSA for sand and gravel as designated by LDP Policy MWYN 1: Safeguarding Mineral Resources, but this would not be impacted by the proposed works as this MSA would be approximately 250 m west of the proposed works site and approximately 700 m from the permanent substation development. . There are three further MSAs for Sand and Gravel approximately 0.5 to 2 km north-west of the proposed works site boundary.

3.4.3 There are three Candidate Wildlife Sites (cWS) that are adjacent to the proposed works site boundary. These cWS comprise of purple moor grass and rush pastures. There is a further cWS approximately 51 m to the northwest and one 80 m to the west. A cWS is a site that is first identified through an initial desk-top survey to verify its quality as a Wildlife Site. Once this has been done, then Policy AMG6: 'Protecting Sites of Regional or Local Significance' can apply to a cWS. Policy AMG6 sets out that proposals causing significant harm to wildlife sites would be refused unless there is an overriding social, environmental and/or economic need for the development and that there is no other suitable site what would avoid having detrimental impact on sites of local nature conservation.

3.5 Relevant Planning History

3.5.1 A review of Gwynedd Council's online planning register (Ref. 1-27) was conducted on 10 June 2025 to establish the planning history associated with the proposed works site and land within 2 km of the proposed works site. The planning history search includes applications for major development that were submitted and are currently awaiting

determination or those that were approved within the last five years, or those that are similar in nature to the proposed works. 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 – Planning history

Application reference	Description	Status	Site location	Distance from the proposed works site
C20/0168/36/YA	Prior notification application for the erection of an agricultural building	Prior Approval Granted 09/04/2020	Bryn Heulog, Bryncir, Garndolbenmaen, Gwynedd, LL51 9LX	0.8 km north of proposed works site
C21/0394/36/LL	Install roof on existing agricultural slurry pit and feeding shed	Approved with conditions 20-05-2021	Llystyn Isaf, Bryncir, Garndolbenmaen, Gwynedd, LL51 9LX	0.6 km from proposed works site
C21/0800/36/LL	Construction of a slurry store with a 20 m underground channel and a shed above	Approved with conditions 06/10/2021	Bryn 'refail Isaf, Garndolbenmaen, Gwynedd, LL51 9PQ	Adjacent to proposed works site at the south-east
C21/0801/36/LL	Redo slurry pit and build roof above	Approved with conditions 07/10/2021	Bryn 'refail Isaf, Garndolbenmaen, Gwynedd, LL51 9PQ	0.2 km south-west of the proposed works site
C21/0806/41/LL	Agricultural shed to keep animals	Approved with conditions 08/12/2021	Fferm Cefn Uchaf, Garndolbenmaen, Gwynedd, LL51 9PJ	1.2 km south-east of the proposed works site
C21/1161/36/LL	Creation of slurry pit underneath the floor of an existing agricultural building	Approved with conditions 24/01/2022	Llecheiddior Uchaf, Bryncir, Garndolbenmaen, Gwynedd, LL51 9EZ	0.93 km north of the proposed works site
C22/0977/36/AC	Application under Section 73 to vary conditions 2, 5 and 37 of planning permission reference C12/0495/36/MW so as to extend the period for the winning and working of mineral up to	Validated 21/10/2022 In Progress	Uchaf, Garndolbenmaen, LL51 9EZ	0.8 km north-west of the proposed works site

Application reference	Description	Status	Site location	Distance from the proposed works site
	31/12/2030 and restoration of the site by 31/12/2031, increase annual output of material from the site to 100,000 tonnes at an average rate of 14 loads per day and use material that has not derived from the operations permitted on site as part of the restoration plan			
C17/0772/36/LL C22/1102/36/AC	Variation of condition 1 (timeframe to start work) on planning permission C17/0772/36/LL (new substation, associated infrastructure, landscaping and new access road) to extend the period for starting the work for a further 5 years	Approved with conditions 27/02/2023	Land To The South Of The A487 And To The East Of B4411, Bryncir, LL51 9LQ	In the proposed works site
C24/0146/36/AC	Application under Section 73 to amend condition 1 of planning permission C09D/0375/36/LL for an additional mobile concrete batching plant and 2 mobile silos	Approved with conditions 16/05/2024	Chwarel Bryncir, Llystyn Gwyn, Bryncir, Garndolbenmaen, LL51 9LX	0.92 km north-west of the proposed works site
C24/1008/36/LL	Roof over existing yard and slurry store	Approved with conditions 13-12-2024	Llecheiddior Uchaf, Bryncir, Garndolbenmaen, Gwynedd, LL51 9EZ	1.1 km north-west of the proposed works site
C24/1075/36/LL	Construction of roof over cattle yard	Approved with conditions 27/01/2025	Bryn 'refail Isaf, Garndolbenmaen, Gwynedd, LL51 9PQ	0.2 km south-west of the proposed works site
C25/0034/36/LL	Roof over existing agricultural yard and slurry store.	Approved with conditions	Rhwng Ddwyryd, Garndolbenmaen,	0.7 km north-east of the

Application reference	Description	Status	Site location	Distance from the proposed works site
		26-02-2025	Gwynedd, LL51 9LQ	proposed works site
C25/0346/36/LL	Installation and operation of a fixed concrete batching plant and 3 material silos and associated equipment to replace existing mobile plant and silos	Approved with conditions 22-08-2025	Chwarel Bryncir, Llystyn Gwyn, Bryncir, Garndolbenmaen, LL51 9LX	0.8 km north of the proposed works site

3.5.2 The proposed works site is currently undeveloped but has benefitted from previous planning permissions C17/0772/36/LL and C22/1102/36/AC, which were secured by the Applicant for similar uses. However, the permissions no longer meet the needs of the Project and has led to the Proposed Works contained within this planning application.

3.5.3 All remaining planning applications and permissions within 2 km of the proposed works site are not considered to impact upon, or be impacted by, the proposed works.

3.5.4 There are no developments of National Significance (DNS) or Nationally Significant Infrastructure Projects within 5 km of the proposed works 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 Bryncir:

"A new substation south of Bryncir village and associated infrastructure and ancillary works, including a new access road from the A487 and the upgrading of an existing *agricultural access track, and new underground 132 kV cables connecting to the existing Electricity Networks overhead line."*

4.1.2 The proposed works would cover an area of approximately 12.4 hectares (ha), but the proposed substation compound would cover approximately 1 ha. The remainder of the land within the proposed works site will comprise the SPEN DB route, access road, construction compounds and laydown areas.

4.1.3 The proposed works are described in further detail below and further details on the installation activities of the proposed works within **Chapter 2** of **ES Volume 3 Bryncir Works**.

4.2 400 kV Substation

4.2.1 The principal components of the proposed Bryncir substation are shown in **Figure 3.2.2** of **Chapter 2** of **ES Volume 3 Bryncir Works** and the equipment to be installed are as follows:

- Super Grid Transformer (1 no. 400/132 kV)
- Ancillary buildings – a small single storey amenity building, approximately 38 m long and 5 m high with a small single storey building housing the main control systems.
- Busbars and Air Insulated Switch Gear (AIS) (1 no. 400 kV and 1 no. 132 kV)
- Earth switches (6 no. 400 kV and 3 no. 132 kV)
- Disconnectors (4 no. 400 kV and 1 no. 132 kV)
- Circuit Breakers (2 no. 400 kV and 1 no. 132 kV)
- Cable Sealing Ends (3 no.)
- Current transformers (12no.)
- Settlement Metering (3 no.)
- Diesel Generator (1 no.)
- Gantry – up to 10.5 m in height
- Low Voltage alternating current (LVAC) transformer
- Surge Arresters (3 no. 400 kV and 3 no. 132 kV)
- Voltage Transformers (3 no. 400 kV and 4 no. 132 kV)

- Water Tank
- Oil Interceptor
- Access Road – access to the proposed works site would be from the A487 using an upgraded existing access track opposite the Bryn-yr-efail-uchaf, before following field boundaries to the substation compound. The permanent access road would be approximately 250 – 300 m long with a maximum width of 6 m and would have a tarmacadam surface with crossing points to enable landowner access across the road.
- Security Fencing – 2.4 m high galvanised steel palisade fencing with an electric fence backing of 3.4 m from ground level.

4.2.2 A secure compound will be required to accommodate the single electrical transformer that would 'step down' the 400 kV voltage of the Pentir to Trawsfynydd circuit to a voltage of 132 kV, ready for connection to Scottish Power Energy Networks (SPEN) DB route.

4.2.3 The compound footprint would be approximately 100 m x 150 m and would be surfaced with stone chippings. Under normal operating conditions the substation would be remotely monitored (unmanned). Visual checks would be undertaken on a monthly inspection visit to the substation compound. Whilst external lighting would be installed at the substation for emergency work during hours of darkness, the substation will not normally be lit.

4.3 Drainage

4.3.1 Foul water generated from the new control building will be stored in a cess tank or similar which will be emptied via a tanker.

4.3.2 Surface water will drain via pipes and swales into an attenuation basin. The discharge from the attenuation basin will be to the existing ditch running south of the proposed Bryncir substation location. The attenuation basin will be approximately 1.5 ha with a 3 m wide grass strip around the basin for access.

4.3.3 Rainwater from transformer bunds will be pumped into a Class 1 Full Retention Oil Separator, before entering the surface water network. Penstocks will be provided to allow discharge from the system to be shut off in emergencies of for sampling.

4.4 Landscape

4.4.1 The construction compounds will be reinstated to existing habitat.

4.4.2 The clawdd (wall)along the A487 will be reconstructed behind the visibility splay with native species hedgerow and stock proof fencing. The eastern side of the access road will consist of a combination of species-rich hedgerow, clawdd, willow trees and species-rich meadow. The western side of the access road will include a strip of species rich grassland with stock proof fencing.

4.4.3 An area adjacent to the western substation boundary will be returned to species rich meadow.

4.5 SPEN DB Route Connection

4.5.1 The SPEN DB route will connect to the proposed Bryncir substation using part underground cables and part overhead line. Planning permission will be sought for the underground cables and consent under s37 of the Electricity Act 1989 will be sought for the overhead line works. The underground section would be approximately 600 m long..

4.5.2 The redundant part of the DB route, approximately 625 m in length, between the new connection and Tower 4ZC070 would be removed (using a section 37 consent under the Electricity Act 1989).

4.5.3 There would be two secondary access points off a single-track lane to the east of the B4411 that would provide access to the DB route on the eastern side of the Afon Dwyfach.

4.6 Footpath Diversion

4.6.1 PRoW Dolbenmaen No 18 footpath currently runs through the proposed works site. The footpath will be permanently diverted to facilitate the proposed Bryncir substation. The footpath will be diverted initially on an alignment adjacent the proposed substation access track until it reaches the substation at which point it follows the boundary to the south of the proposed drainage pond before connecting back into the existing right of way west of the substation. The footpath would not be surfaced. The diverted footpath would not be substantially longer than the current route. The application for the permanent diversion will be made via a separate application under Section 257 TCPA 1990.

4.7 Landowner Track

4.7.1 To allow the landowner access across field boundaries south of the proposed Bryncir substation, an existing hardcore track will be extended to provide access to the south-west of the proposed Bryncir substation. The extension to the track would be approximately 250 m long.

4.8 Access

4.8.1 A permanent access would be created as part of the proposed works from the A487, which would upgrade an existing access point opposite the Bryn-yr-efail-uchaf before following field boundaries to the substation.

4.9 Kiosk

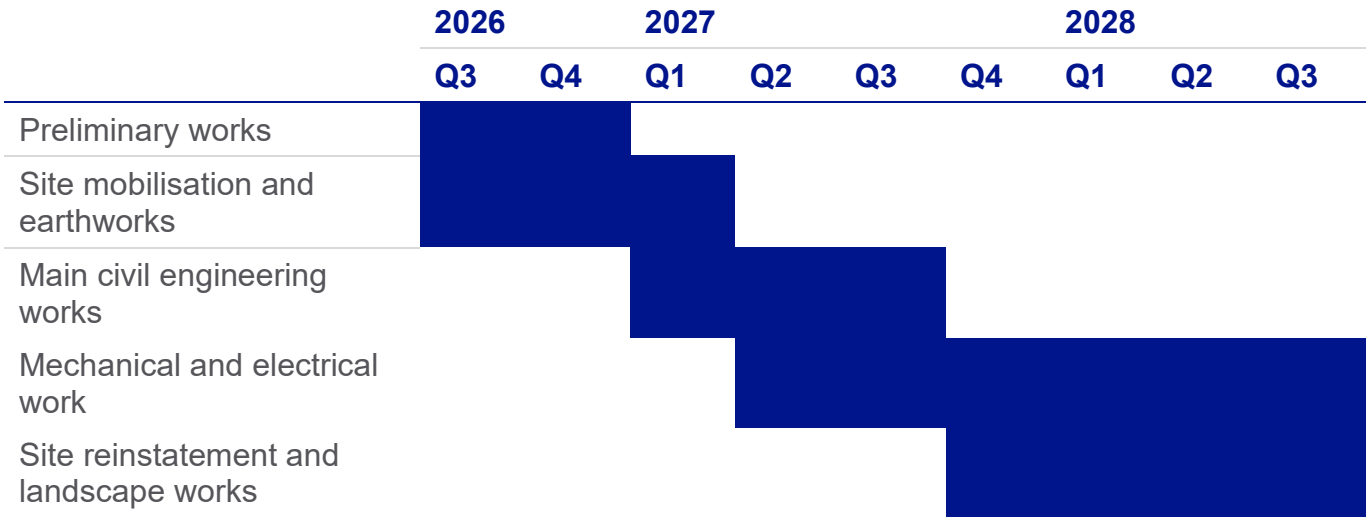
4.9.1 To provide a low voltage electricity supply to the substation, a small kiosk will be positioned on the proposed access road outside the substation compound. A layby on the access road, for operative parking, would be provided opposite the kiosk. A cable would run from the kiosk into the substation.

4.10 Construction

Construction Programme

4.10.1 The proposed works are planned to be undertaken over a period of approximately 18 – 20 months from Q3 2026 to Q3 2028. Construction will occur in phases, which will include activities summarised below.

Table 4-1 – Construction Programme



4.10.2 As outlined in the **ES (Volume 3 Bryncir Works**), construction activities will broadly comprise the following:

- Preliminary works – further site investigation pre-construction surveys required to be undertaken in advance of construction.
- Mobilising to site - this will include development of the site access, forming a temporary hardstanding just off A487. Short term temporary facilities including site offices, welfare, laydown and plant storage will be in place to enable the construction of the earthworks phase of activities. Liaison with Gwynedd Highways Authority will be required to agree the temporary closure of the Dolbenmaen No 18 footpath and Traffic Management requirements on A487.
- Vegetation Clearance and Earthworks – this will include: the diversion of services, de-vegetation and topsoil strip, landowner track construction, new bellmouth construction, access road construction, earthworks drainage, substation platform construction, hardstanding to main temporary site and laydown areas.
- Main civil engineering works – all reinforced concrete works (foundations, slabs etc), below ground earthing, drainage, ducts, troughs, permanent buildings (including services), boundary fence, internal roads, footpaths and car parking.
- Mechanical and electrical work – this will include all primary and secondary electrical plant and equipment and all Stage 1 and Stage 2 testing and commissioning.
- Site reinstatement and landscape works – this will include removal of site offices and temporary facilities, land reinstatement and landscape works.

- Fencing – temporary wire-mesh fencing will be used for substation and cable construction works.
- Lighting and CCTV – low level temporary lighting external lighting will be in place to the site establishment compound and task lighting to specific activities during the works. Permanent external lighting is proposed, but only in use when the site is visited by NGET personnel i.e. hours of darkness.
- Noise – for general construction work the background noise level should not be exceeding 70 decibels (dBA), or greater than levels obtained from main A487 road. No exceedances in the 70 dB threshold are expected, see ES **Volume 3, Chapter 11: Noise and Vibration** for further details.

Construction Access

4.10.3 Prior to the main construction works, access to the proposed works site will be required off the A487, in close co-ordination with Gwynedd Highways Authority. Partial road closures at off-peak times are envisaged and any methodology would be agreed with Gwynedd Highways Authority as part of detailed design.

4.10.4 During construction, access to the proposed works site will be provided from the north via a new access road from the A487. The design will accommodate the passage of an abnormal indivisible load (AIL) i.e. super grid transformer. The access track will have crossing points to enable landowner access across the track.

Construction Site Layout

4.10.5 Temporary fencing, comprising 2.4 m galvanised steel palisade, would be erected around the proposed works site and associated compounds early in the programme to secure the construction area and site security would be in place during non-working hours.

4.10.6 The proposed works would require two compounds, as shown in **Figure 3.2.2** of the ES. The main compound will be immediately north to north-east of the proposed Bryncir substation and will contain site offices and welfare facilities, storage and laydown areas and car parking. The secondary compound will be west of the main site entrance, immediately south of the A487 and will be used for the earthworks phase. Both compounds will be accessed via an access track from the A487.

4.10.7 The construction site will be securely fenced during the construction phase and will accommodate temporary facilities including:

- Site offices including offices and meeting rooms.
- Staff welfare facilities including toilets, kitchen and mess room.
- Storage areas for construction vehicles, plant, equipment, materials and (where required) for storage of waste items to be removed.
- Appropriately bunded areas to be used for the storage of oils, other fuels and waste material, where required.

Staffing and Employment

4.10.8 The number of staff on site during construction would vary depending on the construction phase and activities being undertaken; some activities may be run

concurrently. It is anticipated that the following would be required for each phase of work.

- Preliminary works – two staff and four operatives.
- Site establishment and earthworks – four staff and ten operatives.
- Main civil engineering works – eight staff and twenty-four operatives.
- Mechanical and electrical work – four staff and ten operatives.
- Site reinstatement and landscape works – two staff and six operatives.

Hours of Working

4.10.9 Generally, construction activities will be undertaken during daytime periods only from Monday to Friday 7:00 am – 7:00 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.

4.10.10 There may be some periods of extended or 24-hour working, for example oil filling of the transformer. However, this would be by agreement with the Local Planning Authority.

Operation

4.10.11 The proposed Bryncir substation would typically be unmanned. Maintenance of the substation would be undertaken approximately every three years, involving electrical isolation of equipment before any works are undertaken. Visual checks would be undertaken on a monthly inspection visit to the proposed Bryncir substation. If the substation required refurbishment or replacement works, vehicles would be used to carry workers in and out of the site and suitable vehicles would be used to bring new materials and equipment to site and remove old equipment.

4.10.12 Permanent lighting will be installed but only used when the proposed Bryncir substation is occupied.

4.10.13 The underground cables would require maintenance and possibly replacement should a fault arise.

5. Pre-Application Consultation

5.1 Pre-application Engagement with Gwynedd Council

5.1.1 The Applicant has undertaken pre-application engagement with the Council from 2023-2025. This has included regular virtual meetings, e-mail correspondence and telephone conversations on a number of matters such as the scope of the application.

5.2 Pre-Application Engagement with Other Stakeholders

5.2.1 Throughout the design 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, 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) (Ref. 1-28) and Part 1A of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (Ref. 1-29), all major developments are required to be subject to PAC. The report on the PAC undertaken is presented in the PAC Report which accompanies the planning application.

6. Planning Policy Context

6.1 Introduction

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

6.2 The Development Plan

6.2.1 Sections 38(6) of the Planning and Compulsory Purchase Act 2004 (Ref. 1-30) and paragraph 1.18 of Planning Policy Wales emphasises that planning decisions should be made in accordance with the development plan, unless material considerations indicate otherwise. The Development Plan for the proposed works site comprises:

a) Future Wales – The National Plan 2040 (Ref. 1-31); and

b) Joint Anglesey and Gwynedd Local Development Plan 2011 – 2026 (Ref. 1-26).

Future Wales – The National Plan 2040

6.2.2 Future Wales: The National Plan 2040 ('Future Wales') (Ref. 1-31) was adopted by the Welsh Government in 2021 and is the National Development Framework 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 also 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 reduce 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 support 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*."

The Joint Anglesey and Gwynedd Local Development Plan

6.2.8 The Local Development plan ('LDP') in respect of the Proposed Development is the Joint Anglesey and Gwynedd Local Development Plan 2011 – 2026 (adopted July 2017) (Ref. 1-26).

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

- Strategic Policy PS 1: Welsh Language and Culture
- Policy ISA 1: Infrastructure Provision
- Policy TRA 4: Managing Transport Impacts
- Strategic Policy PS 4: Sustainable Transport, Development and Accessibility
- Strategic Policy PS 5: Sustainable Development
- Policy PCYFF 1: Development Boundaries
- Policy PCYFF 2: Development Criteria
- Policy PCYFF 3: Design and Place Shaping
- Policy PCYFF 4: Design and Landscaping
- Policy PCYFF 6: Water Conservation
- Strategic Policy PS 6: Alleviating and Adapting to the Effects of Climate Change
- Strategic Policy PS 7: Renewable Energy Technology
- Strategic Policy PS 19: Conserving and where appropriate enhancing the Natural Environment
- Policy AMG 3: Protecting and enhancing features and qualities that are distinctive to the Local Landscape Character
- Policy AMG 5: Local Biodiversity Conservation
- Policy AMG 6: Protecting Sites of Regional or Local Significance
- Policy PS 20: Preserving and where appropriate enhancing Heritage Assets
- Policy AT 1: Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens
- Policy AT 3: Locally or Regionally Significant Non-Designated Heritage Assets
- Policy AT 4: Protection of Non-Designated Archaeological Sites and their setting
- Policy ADN 3: Other Renewable Energy and Low Carbon Technologies
- MWYN 1: Safeguarding Mineral Resources

6.3 Material Considerations

Planning Policy Wales (Edition 12)

6.3.1 Planning Policy Wales (February 2024) (PPW) (Ref. 1-32) sets out the land use policies for 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 Paragraph 5.7.8 sets out 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 paragraph 5.7.9, which states that they should be laid underground. Paragraph 5.7.9 acknowledges that a balanced view should be taken in this regard, with consideration of the cost of underground lines 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 Paragraph 5.9.10 states that *"Planning authorities should plan positively for grid infrastructure"*, with appropriate grid developments being supported, and development plans facilitating grid infrastructure required to support renewable and low carbon

energy. Planning authorities should support appropriate grid developments, regardless of whether they are located in 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. These TANs provide detailed planning advice and are material considerations in the determination of planning application in Wales. The following TANs are of particular relevance to the proposed works:

- Technical Advice Note (TAN) 5: Nature conservation and planning (2009) (Ref. 1-33);
- Technical Advice Note (TAN) 6: Sustainable rural communities (2010) (Ref. 1-34)
- Technical Advice Note (TAN) 11: Noise (1997) (Ref. 1-35)
- Technical Advice Note (TAN) 12: Design (2016) (Ref. 1-36)
- Technical Advice Note (TAN) 15: Development, flooding and coastal erosion (2025) (Ref. 1-37)
- Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) (Ref. 1-38)
- Technical Advice Note (TAN) 23: Economic development (2014) (Ref. 1-39)
- Technical Advice Note (TAN) 24: The historic environment (2017) (Ref. 1-40)

National Policy Statement EN-1

6.3.10 The Overarching National Policy Statement (NPS) for Energy (EN-1) (Ref. 1-41) published by the Department for Energy Security and Net Zero (DESNZ) 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 sets out 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 a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*". Paragraph 4.2.5 confirms that all power lines in the scope of NPS EN-5 (Ref. 1-42), including network reinforcement and upgrade works, are a CNP. Paragraph 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 paragraph 4.7.2 outlining that energy projects expected to produce infrastructure sensitive to place. Paragraph 4.7.2 also highlights that the government acknowledges 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 (Ref. 1-42) 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. Without a reliable and secure electricity network, EN-5 is clear that this ambition cannot be achieved (paragraph 1.1.3).

Emerging Gwynedd Local Development Plan

6.3.19 Following cessation of the joint working agreement of Planning Policy matters in March 2023 between Cyngor Gwynedd and the Isle of Anglesey County Council, the Gwynedd Planning Policy Service was established. The process of preparing a new LDP for the Gwynedd Local Planning Authority area has commenced (Ref. 1-43). It will cover the period between 2024 and 2039 and is currently at the Pre-Deposit Stage.

6.3.20 A Call for Candidate Sites consultation closed on 15 January 2025 to identify potential sites for a range of land uses including housing, employment and other uses such as recreation. The Candidate Site Register is available to view via the Gwynedd Local Development Plan (the new Plan) Portal.

6.3.21 Following the closure of the Call for Candidate Sites consultation, Gwynedd Council has planned a consultation period that was anticipated to take place between March 2025 and April 2025 on a pre-deposit Plan, Preferred Strategy and Impact Assessments. However, this stage in preparation of the Plan has not yet taken place. A Deposit Plan (Draft Local Plan) is expected between September 2025 and August 2026, with this submitted for examination in September 2026. The new Gwynedd LDP currently has an

anticipated adoption date of September/October 2027. It is anticipated that these stages in the preparation of the Local Plan may now take place at a later date.

7. Planning Appraisal

7.1 Introduction

7.1.1 This section sets out how the proposed works are in accordance with the development plan as per section 38(6) of the Planning and Compulsory Purchase Act 2004 (Ref. 1-30).

7.2 Principle of Development

7.2.1 There is strong national policy support for strengthening and reinforcement of 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, as part of the Project, will play a key role in supporting the development of innovative 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 comprise onshore development that will connect offshore renewable energy infrastructure.

7.2.2 The proposed works will support the continued expansion of renewable energy generation in the UK, particularly 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. This also aligns with Policy PS 5 and Policy PS 6 in the LDP which sets out criteria required to alleviate and adapt to the effects of climate change and outlines the need to reduce greenhouse gas emissions.

7.2.3 LDP Policy PCYFF 1: Development Boundaries sets out that development within development boundaries will be approved in accordance with other LDP policies, national policies, and other material planning considerations. Development outside the boundaries will be resisted unless it is in accordance with specific LDP or national policies or that the proposal demonstrates that its location within the countryside is essential. It is acknowledged that the proposed works would be on an undeveloped site in the countryside and outside the development boundaries. However, the principle of locating transmission infrastructure in this location is established due to the presence of existing electricity infrastructure. This location is necessary for connection to the existing 4ZC overhead line, which lies immediately west of the proposed substation location and within part of proposed works site boundary. The DB connection route is also located approximately 600 m west of the proposed works site and fed from downleads from the 4ZC line. Also, the location would provide the space required to facilitate the substation and would be set sufficiently away from sensitive receptors to minimise harm to the amenity of adjoining land users. Furthermore, the proposed works site currently has an extant permission for a substation of similar scale and positioning to the proposed

works. This demonstrates that the location has previously been considered appropriate for a development of this type regardless of the countryside location. In 2012, NGET undertook a design and appraisal process which considered in more detail the development of the proposed Bryncir substation. Twelve options were considered, however only three options (the Northern, Southern and Central options) were shortlisted. These three options were summarised in the Design and Access Statement for the original Bryncir substation application

7.2.4 Strategic Policy PS 7 supports the proposed works as they would provide infrastructure to support renewable energy infrastructure and would help to ensure the Plan area is a leading area for initiatives based on renewable or low carbon energy technologies. The need for the proposed works as part of the wider Project has been demonstrated in Section 2 of this Planning Statement as well as the Project being identified in the NOA 2022 as a strategic project forming part of the national great grid upgrade to transition to net zero. The proposed works would be outside of settlement and development boundaries but there is a significant need for them and the countryside location is essential. There would not be a significant conflict with Policy PCYFF 1 and the proposed works would be acceptable in principle.

7.2.5 LDP Policy ISA 1 sets out that proposals will only be granted permission where adequate infrastructure capacity exists or where it is delivered in a timely manner. The proposed works would provide essential utilities infrastructure, which is expected to start delivery in Q1 2026 and be completed in 2028. The proposed works make use of existing infrastructure capacity of the 4ZC overhead line and the DB route. The proposed works would be supported by Policy ISA 1.

7.2.6 Policy PCYFF 5 of the LDP sets out that proposals will need to demonstrate how the energy hierarchy set out in LDP Policy PS 6 has been applied and how renewable or low carbon energy has been maximised. The Energy Hierarchy from Policy PS 6 is set out as follows:

"… i. *Reducing energy demand;*

ii. Energy efficiency;

iii. Using low or zero carbon energy technologies where practical viable and consistent with the need to engage and involve communities; protect visual amenities, the natural, built and historic environment and the landscape."

7.2.7 The proposed works would be for a substation and underground cables and a 132 kV connection to the DB route. This infrastructure would help to facilitate the expected increase in offshore wind that is expected in Wales, as set out in in Section 2 of this Statement. The proposed substation would form essential infrastructure to allow for the renewable energy from offshore wind to be efficiently transmitted and provide a reliable source of electricity. This would help to reduce energy demand by providing an increase in reliable renewable energy and increase energy efficiency by upgrading and improving the electricity transmission network. The impacts on amenity, natural and built environment and the landscape from the proposed works have been assessed in this Statement and the accompanying ES Chapters. The proposed works would contribute to carbon management and reduce energy demand and increase efficiency in line with LDP Policies PCYFF 5 and PS 6.

7.2.8 PPW paragraph 3.61 recognises the need for electricity infrastructure as it is crucial for economic, social and environmental sustainability. 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.

7.2.9 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.

7.2.10 Section 3 of TAN 6: Sustainable Rural Communities supports the diversification of the rural economy and that applications that enhance infrastructure networks in rural areas should be supported.

7.2.11 TAN 23: Economic Development sets out that energy infrastructure can contribute to economic development and can help to improve and strengthen rural communities. The proposed works site is in a rural area, and the proposed works would help to improve the electricity transmission network in North West Wales. This means that the rural community would be able to benefit from an improved electricity network, and not just the larger urban developments in the region.

7.2.12 In conclusion, the principle of the proposed works would be in accordance with Policies PS 7 and Strategic Policy PCYFF 1 of the LDP, Policies 5, 17 and 24 of Future Wales and PPW and NPS EN-1. There is a clear and justified 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 (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 have been undertaken and is set out in **Chapter 4: Landscape and Visual Amenity** of **ES Volume 3: Bryncir Works**, which sets out any potential impacts of the proposed works on landscape and visual amenity.

7.3.2 Policy AMG 3 of the LDP sets out the measures that should be taken to ensure the features and qualities that are distinctive to local landscape character are protected. This includes taking measures to ensure development does not *"cause significant adverse impacts to the character of the built or natural landscape".*

7.3.3 Policy PCYFF 4 of the LDP highlights the importance of considering the landscape and visual impacts of development. It states that all proposals for development should *"integrate into their surroundings"* and will be refused if they fail to show how landscaping (appropriate to the nature, scale and location of the proposed development) has been considered from the outset.

7.3.4 Strategic Policy PS 19: Conserving and where appropriate enhancing the natural environment sets out that consideration to protect, retain or enhance the local character and distinctiveness of the individual Landscape Character Areas, in line with Policy AMG 2. Policy AMG 2 sets out that proposals that would have a significant adverse impact upon landscape character as defined by LCAs must demonstrate through a landscape assessment how landscape character has influenced the design, scale, nature and site selection of the development.

7.3.5 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*".

7.3.6 The proposed works would not have significant effects on national landscape character, nor local landscape character and there would be no direct change to the physical landscape elements within the landscape character area (LCA 04 and LCA 10). Potential effects would be limited to indirect perceptual or aesthetic effects and would not result in significant harm to these LCAs. The LVIA included in the ES concludes that there would be no change to the aesthetic and perceptual aspects at adjacent LCAs and to the setting of the Eryri National Park and the effects would not be significant.

7.3.7 The proposed works site is relatively isolated apart from a few scattered residential dwellings, farmsteads and recreation facilities, all of which lie outside of the proposed works site boundary. The LVIA in the ES provides five representative viewpoints or receptors for the proposed works due to this relative isolation. These viewpoints cover the local road users of the A487, the scattered residential dwellings and farms and users of PRoWs and footpaths.

7.3.8 Most receptors would experience a small-scale change in the view from the construction activity over a small geographical area that would be short term and would result in minor adverse effects. The effects on Eryri National Park would be negligible due to the distance of the proposed works from the receptor and the limited scale of the proposed works. The PRoW Dolbenmaen No 18 would be temporarily closed, but this would not result in any impact on visual amenity for users and any views of the proposed works site from north of this PRoW during construction would have a temporary impact on visual amenity.

7.3.9 Once operational, the proposed substation would be visible within views but would be set in a wider landscape that contains existing electrical infrastructure. By Operation Year 15, the reinstated and enhanced planting would assimilate the proposed works back into the landscape and would result in a limited change in views from most locations with minor to neutral effects. The proposed works have been designed with embedded mitigation measures and due to there not being any significant effects on landscape and visual amenity, no further mitigation measures are required.

7.3.10 In conclusion, no significant effects have been identified for landscape receptors during construction or operational phases. In accordance with LDP Policies AMG 2, AMG 3 and PS 19 and the PPW, the operation of the proposed works would not cause significant adverse impacts to the character of the built or natural landscape.

7.3.11 During construction visual receptors at viewpoint 1 would experience significant effects on visual amenity. At operation year 1 (winter) significant effects would be experienced by receptors at viewpoint 1 and 2, who will be in close proximity to the proposed works with limited intervening vegetation. At operation year 15 (summer) impacts would reduce to non-significant levels as a result of the established boundary planting scheme that will soften and assimilate the proposed works into the landscape and views. No significant effects have been identified for receptors at the remaining representative viewpoints, for all assessment phases. As the significant effects are considered short-term and temporary, and the need for the proposed works is established, the proposed works are in accordance with LDP Policy PCYFF 4.

7.4 Design

7.4.1 LDP Policy PCYFF 3 provides criteria that development should meet, where relevant, to demonstrate high quality design that takes into account the natural, historic and built environment. The requirement for developments to respect the context of the site in which they are proposed and its place in the local landscape is particularly relevant. Future Wales 17 requires the designing of new strategic grid infrastructure to minimise visual impact on nearby communities.

7.4.2 TAN 12 provides guidance on the design process and emphasises the importance of *'promoting sustainability through good design'*.

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 As set out in the **Bryncir Design and Access Statement**, the design of the proposed works is limited by its functional needs. Alternative designs and developments were considered, as set out in the **Bryncir Design and Access Statement** and embedded mitigation measures have been incorporated based on the findings of the ES topics summarised below. However, the proposed works are in a relatively isolated area that would limit the impact on adjoining landowners and settlements and is positioned within the context of existing electrical infrastructure that includes existing overhead lines and pylons. The proposed works would also benefit from landscaping and planting that would mitigate the visual prominence. The proposed works would be in accordance with LDP Policy PCYFF 3, Future Wales Policy 17 and NPS EN-1.

7.5 Ecology and Nature Conservation

7.5.1 Under Strategic Policy PS 19 of the LDP, proposals that have a significant adverse effect on the Plan area's distinctive natural environment, countryside and coastline will be refused unless it is outweighed by the need for and benefits of the development, while Policy AMG 5 requires development proposals to protect and enhance biodiversity through sensitive location and enhancement of habitats. This is also reiterated by Future Wales Policy 9 which requires the maintenance and enhancement of biodiversity including the provision of a "*net benefit*".

7.5.2 Strategic Policy PS 5 sets out that all proposals should protect and enhance the quality of the natural environment, its landscapes and biodiversity assets.

7.5.3 Section 6.4 of PPW and TAN 5 require proposals for development to deliver a net benefit for biodiversity.

7.5.4 An assessment of the likely significant effects on ecologically sensitive receptors is presented in **Chapter 5: Ecology and Nature Conservation** of **ES Volume 3 Bryncir Works**. This concludes that no significant effects on statutory or non-statutory sites would occur because of the proposed works.

7.5.5 Temporary habitat loss may be required for some construction works, but any habitats lost would be reinstated once construction has finished. The Dolwar Heath cWS lies partially within the proposed works site, but this cWS would not be disturbed by the rerouting of the footpath or any other proposed works. This habitat would be suitably protected during construction. All construction would be carried out in accordance with the environmental protection measures formalised through the Construction

Environmental Management Plan (CEMP) (**ES Volume 8 Appendix 3.2.A: Outline Construction Environmental Management Plan**).

7.5.6 It is not anticipated that there would be any adverse impacts or significant effects during operation or maintenance of the proposed works. There is potential for some maintenance works to include refurbishment or replacement of infrastructure, which would be more intrusive. However, the impacts of these works would be equal or less than those associated with construction.

7.5.7 The proposed works have been designed with embedded mitigation measures to ensure the harm to ecology and biodiversity is minimised. The proposed works have been designed with the following ecological buffers:

- 15 m from woodlands, to prevent incursion into Root Protection Areas (RPA).
- 15 m from individual trees to prevent incursion into RPAs.
- 5 m from hedgerows and extended to 10 m where trees are present.
- A minimum of 10 m from watercourses.

7.5.8 Any vegetation clearance would avoid the core nesting bird period (March to August) and clearance in areas that are suitable for reptiles would be carried out at an appropriate time of year. Where vegetation clearance cannot avoid bird nesting season, a check for the presence of any active nests would be carried out prior to any vegetation removal. If active nests are found, appropriate buffer zones where no works take place would be marked out and the area monitored until the young have fledged.

7.5.9 There is one tree that lies in the area of the proposed substation fence that has been identified as having features associated with veteran status (tree T240 as shown on the figures in the **Arboricultural Impact Assessment, ES Volume 8, Appendix 4.5.I**) and is an irreplaceable natural resource. The proposed substation fence will be aligned to the south of the veteran tree in order to avoid the tree and ensure this tree can be retained. All other veteran trees will also be retained. .

7.5.10 Construction works would be restricted to daylight hours where practicable, with focussed task-specific lighting provided where this is not practicable. Low-level lighting for access would be required at the temporary construction compounds. During operation, the substation would not be lit but would have external lighting for emergency use. Any maintenance works would be scheduled for daylight hours where practicable to avoid the need for additional lighting.

7.5.11 Overall, with the incorporation of embedded and additional mitigation measures, significant effects are unlikely to occur on statutory and non-statutory sites or protected and notable species. Therefore, the proposed works would comply with LDP Policies, AMG 5, PS 19 and PS 5, Future Wales Policy 9, PPW and TAN 5.

Net Benefit for Biodiversity

7.5.12 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*".

7.5.13 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 the development proposals through innovative, nature-based approaches to site planning and the design of the built environment."

7.5.14 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…"*

7.5.15 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)".*

7.5.16 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*."

7.5.17 A Net Benefit for Biodiversity (NBB) and Green Infrastructure Statement has been produced to support the full planning permission for a new substation and a new access road from the A487; 132 kilovolt (kV) underground cables from the new substation to their connection with the new 132 kV overhead line to the north-west; realignment of the SPEN DB route and the upgrading of an access track and is included in **Volume 8, Appendix 3.5.J**. 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 3: Bryncir Works**. Both reports should be read in conjunction with the NBB and GI Statement.

7.5.18 The proposed works will impact several habitat features including poor-species grassland, and native hedgerows.. The stepwise approach has been applied and all habitat on-site impacted by the proposed works has been mitigated or compensated for on-site. For GI features (hedgerows, woodland and trees), the relevant compensation planting ratios have been applied to satisfy PPW12 GI requirements. Where grassland is to be removed, reinstated, or created, a species rich mix has been chosen to represent an ecological enhancement and align with the DECCA framework. This intervention is proportionate and targeted, replacing low-value habitat with one of high distinctiveness and ecological function.. Compensation planting has also been proposed where hedgerows and trees may need to be removed. .

7.5.19 In conclusion, the proposed works has followed the stepwise approach for all on-site habitats and has applied the DECCA framework where required to ensure all habitat-specific enhancements and creation are proportionate to the proposed loss. 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. Historic Environment

7.6 Historic Environment

7.6.1 **Chapter 6: Historic Environment** of **ES Volume 3: Bryncir Works** provides an assessment of the potential effects of the proposed works on heritage and archaeological assets. An area of 3 km from the proposed works site was reviewed to identify designated assets with the potential to be impacted by the proposed works.

7.6.2 LDP Policies PS5 and PS 20 require developments to preserve and enhance the quality of the historic environment assets, including their setting.

7.6.3 Policy AT 3 of the LDP requires proposals to conserve non-designated heritage assets while Policy AT 4 requires the protection of non-designated archaeological sites and their setting.

7.6.4 Section 6.1 of PPW sets out the importance of heritage assets and sets the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment. TAN 24 furthers these objectives and puts importance on the protection, conservation and enhancement of heritage assets.

7.6.5 There are no designated heritage assets in the proposed works site boundary. The proposed works would not result in significant effects on designated heritage assets within 3 km of the proposed works site, due to the relatively minor scale of the proposed works.

7.6.6 A 500 m study area from the proposed works site was assessed in relation to non-designated historic assets and for the assessment of archaeological potential in the proposed works site.

7.6.7 The proposed works are not anticipated to result in any adverse impacts on non-designated heritage assets or archaeological sites, but groundbreaking works would impact the route of an old road from Garn Dolbenmaen (a non-designated asset of unknown date). An archaeological watching brief on selected ground works is required, which will be set out in a Written Scheme of Investigation (WSI) and agreed with the Archaeological Advisor for Heneb once full details of the construction works have been agreed and prior to the works commencing.

7.6.8 There would not be any significant effects on designated and non-designated heritage assets during the operation phase of the proposed works and thus, no requirement for mitigation.

7.6.9 In conclusion, the proposed works would not result in significant effects on designated or non-designated heritage assets and their settings during the construction and operation phases. Any potential impacts would be mitigated in the WSI, and additional measures as required. The proposed works would comply with LDP Polices PS 5, PS 20, AT 3 and AT 4 and PPW section 6.1 and TAN 24.

7.7 Ground Conditions

7.7.1 **Chapter 7: Geology, Hydrogeology, Land Use and Agriculture** of **ES Volume 3: Bryncir Works** provides an assessment of the likely significant effects on ground conditions that could arise from the construction, operation, and maintenance of the proposed works.

7.7.2 LDP Policy PCYFF 2 requires development proposals to demonstrate they will not have unacceptable adverse impacts in terms of pollution. LDP Policy PS 19 requires all proposals to reduce effects on water resources and quality.

7.7.3 Policy MWYN 1 sets out that mineral resources will be safeguarded from non-mineral development that would sterilise or hinder their extraction.

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

7.7.5 During construction, works on contaminated land would be avoided. If contaminated land is discovered during construction, an inspection and discovery strategy would be devised and agreed with the regulatory authorities. Mitigation measures would be in place to avoid any potential impacts and would be managed through the implementation of a CEMP.

7.7.6 Materials excavated during construction will be re-used on the proposed works site where possible and would be carried out in accordance with the relevant plan for materials. Any materials that need to be removed from site would be disposed of at an appropriate facility. Any material imported to the proposed works site will be natural quarried stone or, if recycled, the material will undergo chemical testing. Following the implementation of a CEMP and Soil Management Plan (SMP), no significant adverse impacts are anticipated from soil and ground water pollution during the construction, operation, or maintenance of the proposed works. The CEMP and SMP would also ensure protection of human receptors on site.

7.7.7 The MSA for Sand and Gravel would be approximately 250 m from the proposed works site and approximately 700 m from the permanent substation development. Therefore, no impact on the safeguarded sand and mineral resource is expected.

7.7.8 The proposed works are not anticipated to result in significant adverse impacts in terms of ground conditions, with appropriate measures proposed to reduce impacts from pollutions to soils and groundwater, in accordance with LDP policies PCYFF 2 and PS 19. In accordance with PPW, the proposed works have considered issues arising from potential land contamination and proposed the implementation of remedial measures should they be necessary.

7.8 Flood Risk and Drainage

7.8.1 An assessment of the likely flood risk effects that could arise from the construction, operation and maintenance of the proposed works has been undertaken and is set out in **Chapter 8: Water Quality, Resources and Flood Risk** of **ES Volume 3: Bryncir Works**.

7.8.2 LDP Policy PCYFF 6 sets out that proposals should incorporate water conservation measures where practicable, including Sustainable Drainage Systems (SuDS). This policy further sets out that all proposals should implement flood minimisation or mitigation measures where possible, to reduce surface water run-off and minimise the contribution to flood risk elsewhere. LDP Policy PS 5 supports this by stating that all proposals should manage flood risk and maximise the use of sustainable drainage schemes.

7.8.3 Future Wales Policy 8 encourages flood risk management and sets out that opportunities for multiple social, economic and environmental benefits must be maximised.

7.8.4 TAN 15 sets out the vulnerability to flooding of different developments and the vulnerability category. The Proposed substation would be classed as less vulnerable development under TAN 15 as it is not directly associated with a power station. TAN 15 requires a Flood Consequence Assessment (FCA) for any development located fully or partly in Surface Water and Small Watercourse – Flood Zones 2 and 3.

7.8.5 The Afon Dwyfach is an NRW Main River and approximately 125 m from the proposed works site. . There are no proposed works crossing or close to the watercourse.

7.8.6 The NRW Flood Map for Planning indicates several areas, including the proposed Bryncir substation, at risk of flooding from surface water and small watercourses. A Flood Consequence Assessment (FCA) (**Volume 8, Appendix 3.8.A: Flood Consequence Assessment**) has been completed for the proposed works, which concludes that the substation would be considered to be compliant with the requirements of TAN15 over the proposed design life.

7.8.7 Mitigation measures will be employed in order to minimise the risk of flooding during the construction and operation of the proposed works

7.8.8 The design of the proposed substation incorporates a diversion channel to divert the surface water flow path around it and also a Sustainable Drainage System (SuDS) attenuation system to ensure there is no increase in flood risk. No further mitigation is required for other operation and maintenance activities.

7.8.9 Overall, it has been demonstrated that the proposed works are not anticipated to have any significant impacts on flood risk and drainage. There is potential for flood related risks during the construction, operation and maintenance of the proposed works, but this risk would be minimised by the implementation of the mitigation measures mentioned above and contained within the CEMP. The proposed works would accord with Policy 8 of Future Wales and LDP Policies PCYFF 6 and PS 5 as well as TAN 15.

7.9 Traffic and Transport

7.9.1 **Chapter 9: Traffic and Transport** of **ES Volume 3: Bryncir Works** provides an assessment of the likely significant traffic and transport effects that could arise from the construction, operation and maintenance of the proposed works.

7.9.2 Policy TRA 4 of the LDP sets out that proposals that would cause an unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks will be refused. Also, this policy requires proposals, where appropriate, to be planned and designed in a manner that promotes the most sustainable modes of transport. The main access to the proposed works site during construction would be from the A487 using an upgraded existing access. A small number of staff will also use an access off the B4411 to construct a tower off this road, as well as an access on the A487 North. The peak traffic generation is anticipated to be between Months 1 and 12, with Month 6 of construction potentially occurring as early as 2026.

7.9.3 The proposed works are expected to generate a 24 Hour Annual Average Daily Traffic (AADT) of 84 construction worker vehicles, accounting for the arrivals and departures of construction workers and HGVs over a typical day. The proposed works are not expected to result in an increase of more than 30% total vehicles of HGVs in an average day. The largest proportional increase in 24 Hour AADT is anticipated at Automatic Traffic Count (ATC) 3.3 (B4411 south of A487), with an overall 0.7% increase in average daily traffic. There would not be significant impact on traffic during

construction and any potential impact would be temporary and managed through the embedded mitigation measures. Traffic levels are expected to only minimally increase and none of the links assessed in the ES will experience increases substantial enough to result in significant impacts.

7.9.4 During construction, construction workers would be encouraged to car share to reduce single occupancy car trips and would promote the benefits of car sharing. This would encourage more sustainable transport choices

7.9.5 During construction, there is expected to be 1 abnormal indivisible load (AIL) movement associated with the transformer being delivered to the proposed works site. No AIL movements are anticipated during the operation and maintenance phase due to the delivery of spare cabling during the construction.

7.9.6 During operation, activity on site would be restricted primarily to maintenance purposes, as the proposed substation would be unmanned. Maintenance would be undertaken approximately every three years. There would be no requirement for regular HGV movements during the operation and maintenance of the proposed works. The operation and maintenance phase are anticipated to create much less traffic than during the construction phase and remain similar in magnitude to current levels. Therefore, operational effects are expected to be negligible and not significant.

7.9.7 The proposed works have been designed, as far as practicable, to avoid and reduce impacts and effects on traffic and transport during both the construction and operation and maintenance phases, through the process of design development and by embedding mitigation measures into the proposed works design. **Chapter 9: Traffic and Transport** of **ES Volume 3 Bryncir Works** explains embedded mitigation measures in further detail.

7.9.8 The proposed works would not lead to unacceptable harm to the safe and efficient operation of the highway and the assessment of transport impacts in **Chapter 9: Traffic and Transport** of **ES Volume 3: Bryncir Works** confirms no adverse impacts are anticipated, in accordance with LDP Policy TRA 4. The proposed works also accord with PPW as the assessment covers the construction, operation and maintenance and concludes no adverse impacts will arise during any of the phases of development.

7.10 Amenity

7.10.1 This section appraises the impacts of the proposed works on air quality, noise and vibration.

7.10.2 LDP Policy PCYFF 2 sets out that proposals will be refused where they would have an unacceptable adverse impact on the amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to vibration, noise, dust, fumes and other forms of pollution.

Air Quality and Emissions

7.10.3 **Chapter 10: Air Quality and Emissions** of the **ES Volume 3: Bryncir Works** provides an assessment of the likely significant air quality and emissions effects that could arise from the construction, operation and maintenance of the proposed works.

7.10.4 The assessment has followed the Institute of Air Quality Management (IAQMP) guidance on assessing construction site air quality impacts. This assessment determined that provided all construction activities adhere to the mitigation measures in

the CEMP and the ES chapter, the potential magnitude of impacts will be negligible and not significant.

7.10.5 The impact of Non-Road Mobile Machinery (NRMM) emissions is not anticipated to be significant due to the effectiveness of standard practice emissions and control measures as well as the good standard baseline air quality and intermittent nature of this source.

7.10.6 Construction road traffic emissions and operation road traffic emission impacts were screened out of the assessment. The increase in traffic during construction would not contribute to a significant effect on local air quality. There would be no change to operational road traffic, so there is no potential for a significant effect on local air quality from a change in emissions.

7.10.7 Mitigation measures will be adopted during the construction and are recommended by IAQM. These measures include plan site layout, so machinery is away from receptors; record all dust and air quality complaints, identify cause, take appropriate measures to reduce emissions in a timely manner and record measures taken; ensure all vehicles switch of engines when stationary and use enclosed chutes and conveyors and covered skips. The full list of mitigation measures can be found in **Chapter 10: Air Quality and Emissions** of **ES Volume 3: Bryncir Works.**

7.10.8 Overall, the proposed works are not anticipated to result in significant impacts on air quality during the construction and operation phases. Adherence to mitigation measures will ensure that the impact on air quality is negligible and not significant.

Noise and Vibration

7.10.9 **Chapter 11: Noise and Vibration** of the **ES Volume 3: Bryncir Works** provides an assessment of the likely significant noise and vibration effects that could arise from the construction, operation and maintenance of the proposed works.

7.10.10 LDP Policy PCYFF 2 sets out that proposals will be refused where they would have an unacceptable adverse impact on the amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to vibration, noise, dust, fumes and other forms of pollution.

7.10.11 There are multiple residential properties and farms within or immediately adjacent to the proposed works site which have the potential to experience construction related noise and vibration effects. The closest of these receptors is approximately 30 m west of the proposed works site. The impact on PRoW users has been scoped out of the assessment as construction noise would only effect users for a limited time when they are close to the source.

7.10.12 Noise levels from construction activities associated with preliminary works, enabling works, cable installation and demobilisation are predicted to be below the relevant significance threshold at each receptor by more than 5 decibels (dB). Construction noise levels of this magnitude are identified as a very low impact and a negligible effect at medium sensitivity receptors, which is not significant. Noise levels associated with landscaping works are expected to be more than 5 dB below the relevant threshold for all receptors apart from one, receptor R08 (Felin Llecheiddior Road) where this would be 4 dB below. Noise levels associated with landscaping works would have a negligible effect and not significant at all receptors apart from R08, which would have a low impact. This low impact at R08, which is a medium sensitivity receptor, would be a minor adverse effect and not significant.

7.10.13 The vibration levels for preliminary works, cable installation (open cut cable laying) and landscaping works would have a negligible effect on all receptors, which would be not significant. The ground-borne vibration levels would not result in significant effects on all receptors for enabling works. No significant vibration effects are expected from demobilisation as the equipment used, such as cranes and compressors, are not recognised sources of high levels of ground-borne vibration.

7.10.14 The increase in construction traffic is expected to result in a worst-case scenario increase in road traffic noise of +0.0 dB along the B4411 to the south of the A487. This increase in noise is equivalent to a negligible effect and is not significant.

7.10.15 An operational noise assessment (**Bryncir Operational Noise Impact Assessment**) has been completed for the proposed works. The initial impact assessment shows that the estimated impact is predicted to be low at all identified receptors, except for two; NSR1, which is the residential property of Ynys-dyfnallt, and NSR2, the residential property called Bryn-'refail-isaf; where it is expected that it would be slightly over the existing representative background sound levels. In accordance with BS 4142, the representative background sound levels and the rating levels are very low.

7.10.16 The results of the change in ambient noise levels from the operational noise assessment predicted that the proposed development would not change the existing ambient noise levels. The predicted external noise levels at the receptors would be below 30 dB. The noise impact from the proposed works on the nearby sensitive receptors is expected to be low.

7.10.17 Mitigation measures will be secured within the CEMP and include ensuring all measures are in place to minimise noise before works begin and throughout the construction programme, use of modern plant, all construction plant and equipment to be properly maintained and silenced where appropriate, operated to prevent excessive noise and switched off when not in use. The full list of mitigation measures can be found in **Chapter 11: Noise and Vibration** of **ES Volume 3: Bryncir Works**.

7.10.18 Overall, the proposed works are not anticipated to result in significant effects on the surrounding receptors in terms of noise and vibration during the construction, operation and maintenance phases. Mitigation measures will be incorporated into the construction phases to reduce overall exposure to noise pollution. The proposed works would accord with LDP Policy PCYFF 2 as they would not give rise to unacceptable adverse impacts on the amenity of local residences, other land and property uses and would accord with PPW and TAN 11.

Public Rights of Way

7.10.19 Strategic Policy PS 4 sets out the LPA's aim to encourage sustainable transport, development and accessibility. In relation to PRoWs, this policy sets out that PRoWs and cycleway networks would be safeguarded, improved, enhanced and promoted to improve safety, accessibility and increase health, leisure and wellbeing benefits.

7.10.20 PRoW 18 passes through fields where the substation will be constructed and so it will be necessary to for it to be temporarily closed for the duration of the construction works. This footpath does not connect users to community facilities or employment opportunities and would primarily be used recreationally. The impact on PRoW users would be low and not significant.

7.10.21 The diverted PRoW would not be used for commuters and there would be no impact on commuting times or times to access facilities. The proposed diversion would still

connect to the existing route and would not result in an isolated footpath; this would ensure the footpath remains safe and accessible. Also, the footpath would be safeguarded with the footpath diversion being created rather than being lost altogether by the development.

7.10.22 The temporary closure of PRoW 18 would not significantly affect recreational users. The proposed diversion would ensure the PRoW is safeguarded and would comply with Strategic Policy PS 4 of the LDP.

7.11 Cumulative Effects

7.11.1 **Chapter 5** of **ES Volume 7** sets out the cumulative effects of the proposed works and the wider Project.

7.11.2 Local policy, including Policy ADN 3 of the LDP also require cumulative impacts of development to be considered including in relation to landscape, visual impact, noise, ecology and ground and surface water.

7.11.3 Consideration of the cumulative impact of development is required in National policy, including PPW. PPW emphasises the need for potential cumulative effects of proposals to be considered and outlines how these will be a consideration in making planning decisions. Paragraph 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"*.

7.11.4 There have been no developments in proximity to the proposed works site and there are no sensitive receptors that have been assessed in proximity to the proposed works site. The assessment concludes that there would be no likely significant cumulative effects from the Bryncir element of the Project.

7.12 Welsh Language

7.12.1 In accordance with LDP Policy PS 1 and TAN 20, a Welsh Language Statement has been submitted as part of the application, which demonstrates that the proposed works will not lead to adverse impacts on the character and language balance of local communities (**Ref 2.12.A).** Despite no adverse impacts, it is expected that measures will be implemented to ensure that use of the Welsh language is preserved. Measures will 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. As identified in **Section 6** of the **Bryncir Welsh Language Statement**, the Project could provide resources for workers, such as key phrase lists, to help those who cannot speak Welsh.

8. Planning Balance and Conclusion

8.1.1 This Planning Statement has been prepared to accompany an application for full permission for a new substation south of Bryncir village and associated infrastructure and ancillary works, including a new access road from the A487 and the upgrading of an existing agricultural access track, and new 132 kV underground cables connecting to the existing Electricity Networks overhead line.

8.1.2 The planning application is necessary as part of the 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 up 2030.

8.1.3 The new substation and underground cables are 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"*.

8.1.4 Planning Policy 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.

8.1.5 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 to decarbonise and provide energy security.

8.1.6 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.

8.1.7 The proposed works have been the subject of environmental surveys and assessments to identify, avoid by design and mitigate adverse effects. The proposed works have been assessed against their compliance with policies in the Development Plan and regard has been had to other material considerations. The appraisal in Section 7 sets out how the proposed works are in accordance with the relevant policies forming part of

the Development Plan with respect to landscape and visual, ecology, the historic environment, ground conditions, flood risk and drainage, traffic and transport, air quality, noise and vibration and cumulative effects.

8.1.8 Substantial positive weight should be given to the urgent need for the proposed works as demonstrated in this Planning Statement, along with the other associated benefits including the contribution towards a reliable, secure electricity system. The **ES Volume 3 Bryncir Works** and the appraisal in this Planning Statement demonstrate that adverse impacts have been minimised with embedded mitigation measures and additional measures where necessary to minimise the environmental impacts. There would be permanent residual impacts on landscape and visual receptors however these impacts are not considered to be significant.

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 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 in accordance with the Development Plan. Moreover, the proposed works deliver substantial public benefits and planning permission should be granted without delay.

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