

# Gas Connection Planning and Design Access Statement (PDAS) Abergelli Power Project

August 2018

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# 1. Introduction

## 1.1 Overview

- 1.1.1 This Planning and Design Access Statement (PDAS) has been prepared on the behalf of Abergelli Power Limited (APL) in support of an application for full planning permission for a gas connection to the proposed Abergelli Power Project Station from the National Gas Transmission System (hereafter referred to as the “Gas Connection”). The location of the Gas Connection can be viewed on Figure 1: Site Location Plan. The Gas Connection comprises:

*“Installation of a Gas Connection in the form of a new Above Ground Installation and underground Gas Pipeline to bring natural gas from the National Gas Transmission system to the Abergelli Power Station, including access, associated engineering operations and landscaping.”*

- 1.1.2 An application for a screening opinion was submitted pursuant to Regulation 6(1) of the *Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017* (the ‘EIA Regulations’) to the City and County of Swansea Council (CCS) regarding the need for an Environmental Impact Assessment (EIA) for the Gas Connection on the 15th June 2018.
- 1.1.3 On the 19th July, CCS confirmed that the Gas Connection was not EIA Development, and therefore no EIA is required. This PDAS therefore provides the required planning and design information to support this Planning Application under the Town and Country Planning Act 1990 (as amended).

## 1.2 Background

- 1.2.1 APL proposes to construct and operate an Open Cycle Gas Turbine (“OCGT”) peaking power generating station (the “Power Generation Plant”) and new connections to the gas and electricity networks on land adjacent to the Felindre Gas Compressor Station at Abergelli Farm, Felindre, Swansea SA5 7NN (the “Project”).
- 1.2.2 APL's project is split into three different elements which are described below, which together form the “Project”. These elements are referred to as the Power Generation Plant, the Gas Connection, and the Electrical Connection.
- 1.2.3 The three main elements of the Project comprise:
- An Open Cycle Gas Turbine (OCGT) peaking power generating station, fuelled by natural gas and capable of providing a rated electrical output of up to 299 Megawatts (MW). The Power Generation Plant comprises:
    - Generating Equipment including one Gas Turbine Generator with one exhaust gas flue stack and Balance of Plant (BOP) (together referred to as the “Generating Equipment”) which are located within the “Generating Equipment Site”;
    - An Access Road to the Project Site from the B4489 which lies to the west, formed by upgrading an existing access road between the B4489 junction and the Swansea North Substation (the “Substation”) and constructing a new

section of access road from the Substation to the Generating Equipment Site; and

- A temporary construction compound for the storage of materials, plant and equipment as well as containing site accommodation and welfare facilities, temporary car parking and temporary fencing (the “Laydown Area”). A small area within the Laydown Area will be retained permanently (the “Maintenance Compound”).
- Ecological Mitigation Area – area for ecological enhancement within the Project Site Boundary.
- Permanent parking and drainage to include: a site foul, oily water and surface water drainage system.
- A Gas Connection in the form of a new Above Ground Installation (AGI) and underground gas connection (the “Gas Pipeline”) to bring natural gas to the Generating Equipment from the National Gas Transmission System; and
- An Electrical Connection in the form of a new underground electrical cable to export power from the Generating Equipment to the National Grid Electricity Transmission System (NETS).

1.2.4 The Gas Connection is the focus of this PDAS.

## 1.3 Information Submitted in Support of the Application

1.3.1 Documents supporting this application include:

- The completed planning application form and accompanying certificates;
- Plans;
- Pre-Application Consultation Report;
- Environmental Report, with Appended Reports:
  - EIA Screening Request and Matrix
  - Mitigation Register
  - Preliminary Ecological Appraisal Report.
  - NVC Survey Report 2014
  - Invertebrate Survey Report
  - Great Crested Newt Survey Report
  - Reptile Survey Report
  - Breeding Bird Survey Report
  - Breeding Bird Survey UPDATE Report
  - Bat Roost and Walked Activity Transect Survey Report
  - Bat Roost and Walked Activity Transect Survey UPDATE Report
  - Bat Survey Report 2014
  - Dormouse Survey Report
  - Otter and Water Vole Survey Report
  - Badger Survey Report (Confidential)
  - Arboricultural Survey Report 2014
  - Preliminary Ecological Appraisal 2014
  - Otter and Water Vole Survey Report 2014
  - Final Dormouse Survey Report 2014
  - Breeding Bird Survey Report 2014
  - Great Crested Newt Survey Report 2014
  - Reptile Survey Report 2014
  - Invasive Plant Species Survey Report

- Flood Consequence Assessment (FCA)
- Water Framework Directive (WFD) Screening Assessment
- Noise Survey
- Cultural Heritage Gazetteer
- Landmark Envirocheck report
- Preliminary Geo-Environmental Risk Assessment
- Coal Authority Mining Report

## 1.4 Legislative Context

### a) Requirement for a Design and Access Statement

- 1.4.1 The requirement for a Design and Access Statement (DAS) is set out in the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 and applies to all planning applications for major development in Wales. Major development is defined in paragraph 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as:

*“development involving any one or more of the following—*

*(a) the winning and working of minerals or the use of land for mineral-working deposits;*

*(b) waste development;*

*(c) the provision of dwellinghouses where:*

*(i) the number of dwellinghouses to be provided is 10 or more; or*

*(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);*

*(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or*

*(e) development carried out on a site having an area of 1 hectare or more.”*

- 1.4.2 The Gas Connection Site exceeds 1 hectare in size and therefore comprises major development and a DAS is required to accompany the planning application.

- 1.4.3 Relevant guidance on the preparation of DAS documents is provided in the following documents:

- Planning Policy Wales (PPW) Edition 9 (January, 2016);
- Technical Advice Note (TAN) 12: Design (March 2016); and
- Best practice guidance on preparing DAS documents is set out in Design and Access Statements in Wales Why, What and How, June 2017. The guidance was prepared by the Design Commission for Wales (DCfW) on behalf of the Welsh Government.

- 1.4.4 For ease of reference, the assessment of planning policy in respect of the Gas Connection has been incorporated with the design assessment in this PDAS.

#### **b) Development Consent under the Planning Act 2008**

##### **i. Power Generation Plant**

- 1.4.5 The Power Generation Plant described above would have a rated electrical output of up to 299 MW of electricity and is therefore classified as a Nationally Significant Infrastructure Project ("NSIP") under section 15 of the Planning Act 2008 (as amended) ("PA 2008").
- 1.4.6 As such, APL is applying to the Secretary of State ("SoS") for Business, Energy and Industrial Strategy under section 31 of the PA 2008 for a Development Consent Order ("DCO") for powers to construct, operate and maintain the Power Generation Plant. The DCO Application was submitted on 25<sup>th</sup> May, 2018 and accepted for Examination on 21<sup>st</sup> June 2018.

##### **ii. Associated Development**

- 1.4.7 The Gas Connection and Electrical Connection comprise development associated with the NSIP ("associated development").
- 1.4.8 The PA 2008 restricts associated development for which consent can be sought under a DCO in Wales to development that is associated with a generating station with a capacity in excess of 350 MW. As the Power Generation Plant would have rated electrical output of up to 299 MW, associated development to the Power Generation Plant cannot be included in any application for DCO under the PA 2008. The application for a DCO therefore only includes the Power Generation Plant and related mitigation as "authorised development" and does not seek development consent for the Gas Connection or the Electrical Connection.

##### **iii. Town and Country Planning Act 1990**

- 1.4.9 APL is seeking full planning permission for the Gas Connection under the Town and Country Planning Act 1990 (as amended) ("TCPA 1990").

##### **iv. Abergelli Power Project Environmental Statement**

- 1.4.10 The Project is a Schedule 1 development as it is a thermal generating station with a heat output of 300 MW or more as listed in Schedule 1, paragraph 2(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. As such, an EIA has been carried out in respect of the development.
- 1.4.11 Mitigation has been identified within the EIA carried out for the Project which is applicable to the Gas Connection. This mitigation includes both embedded mitigation (mitigation inherent in to the design of the Project and also specifically to the Gas Connection), or additional mitigation (which is required to mitigate any residual adverse effects of the Project).

## **1.5 The Developer**

- 1.5.1 The Applicant is APL, an energy development company established for the Project and owned by Drax Group plc (Drax).

- 1.5.2 Drax is responsible for generating 6% of the UK's electricity, predominantly via Drax power station in Selby. Drax is one of the UK's largest energy producers and is committed to helping to reduce carbon emissions, displacing more coal off the system and providing additional system support to plug the gaps created by intermittent renewables and boost security of supply.
- 1.5.3 Drax acquired APL from Watt Power Limited (Watt Power) in 2016. Stag Energy Development Company Ltd (Stag Energy) previously provided management services to Watt Power in relation to APL. Stag Energy continues to provide resources to APL through a management services agreement. Stag Energy was founded in 2002 and the company draws on a depth of experience within a team that has created and delivered over 10,000 MW of power generation and related infrastructure projects across the globe, of which 2,500 MW has been delivered in the UK.
- 1.5.4 APL is committed to the development of assets to support the UK Government's drive to a low carbon economy. APL recognises the need to balance commercial issues with the environmental benefits and concerns relating to energy projects and believes this balance can be responsibly delivered. The Gas Connection as part of the Project will be designed and developed to high quality, safety and environmental standards.
- 1.5.5 Further information on the companies referred to above is provided at [www.abergellipower.co.uk](http://www.abergellipower.co.uk) or [www.drax.com](http://www.drax.com).

## 1.6 Purpose and Structure of this Statement

- 1.6.1 This document includes a Design and Access Statement (DAS) as well as a planning statement, collectively known as a PDAS. A DAS is a document which explains how the objectives of good design have been considered from the outset of the development process and how the objectives of good design have been used to inform this. Paragraph 4.11.14 of PPW states that a DAS should include an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal. They should be 'living' documents dealing with all relevant aspects of design throughout the process and the life of the development, clearly stating the comprehensive design principles and concepts adopted and include illustrative material in plan elevation and section where relevant.
- 1.6.2 The DCfW guidance on the preparation of DAS documents states that a DAS should:
- Demonstrate a good understanding of the site, context and brief;
  - Demonstrate that the proposal meets local authority and Welsh Government design quality and planning policy objectives;
  - Communicate and explain design ideas;
  - Communicate how the proposal contributes to placemaking; and
  - Speed up the decision making process.
- 1.6.3 In line with the guidance, this PDAS aims to explain the design concept of the Gas Connection in relation to:
- Character;
  - Access;
  - Movement;

- Environmental sustainability;
- Community safety; and
- Response to planning policy.

1.6.4 The PDAS acts as the primary reference document for an explanation of the planning issues pertinent to the Gas Connection, with regard to the relevant National Policy Statements and other important and relevant matters. The PDAS explains how the Gas Connection complies with the relevant policy considerations, including national planning policy and the development plan.

1.6.5 A number of other documents in the Application set out design features or mitigation that address relevant planning issues. Where relevant, the PDAS cross-refers to these documents to provide further explanation.

1.6.6 The PDAS is structured to include:

- **Section 2** describes the Gas Connection Site;
- **Section 3** describes the Gas Connection;
- **Section 4** outlines the approach to design;
- **Section 5** considers relevant planning policy and compliance with policy by the Gas Connection; and
- **Section 6** presents the conclusions of this PDAS.



## 2. Site and its Surroundings

### 2.1 Gas Connection Location

- 2.1.1 The Gas Connection (see Figure 1) is located on open agricultural land approximately 2 kilometres (km) north of Junction 46 on the M4, approximately 3 km to the north of the city of Swansea, 1 km southeast of Felindre and 1.4 km north of Llangyfelach. The current land use is improved grazing for sheep and horses on poor quality agricultural land (Agricultural Land Classification Grade 4). The application area extends to 16.4 ha.
- 2.1.2 There are no residential dwellings located along the Gas Connection. Ground levels vary from approximately 146 metres (m) above ordnance datum (AOD) at the highest point in the north-west corner at Rhyd-y-pandy Road to approximately 80 m AOD along the southern perimeter, with ground levels generally falling in a southerly and south easterly direction. The CCS Unitary Development Plan (UDP) Proposals Map (**Ref. 2-1**) identifies mineral deposits along the Gas Connection including coal and sand and aggregates. There is a groundwater body below the Gas Connection of poor current and projected *Water Framework Directive* (**Ref. 2-2**) status.
- 2.1.3 There are two hedgerows along the Gas Connection that depict field boundaries that could have medieval origins. The first is located in the northern extent of the Gas Pipeline, running north-south along the field boundary that marks the edge of the western boundary of the Gas Connection. The second crosses perpendicular to the Gas Connection approximately half way along the Gas Pipeline length.
- 2.1.4 The Gas Connection crosses one field drain that discharges into the Afon Llan. The Afon Llan links with the Afon Lliw and the River Loughor, which discharges into Carmarthen Bay through Bury Inlet, 7 km west of the Gas Connection. Carmarthen bay and its estuaries is designated as a Special Area of Conservation (SAC) and Bury Inlet is designated as a Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and as a wetland of international importance under the Ramsar Convention. There are no Main Rivers within the Gas Connection construction working width.

### 2.2 Surrounding Area

- 2.2.1 The area surrounding the Gas Connection is, at present, predominantly rural in character, although there is the Felindre Park and Share facility to the south and a substantial amount of utility infrastructure in the area, some of which the Gas Connection will cross.
- 2.2.2 The National Gas Transmission System, a Water Main and the Oil Pipeline are all located in the area around the Gas Connection. To the west of the Gas Connection there is the Swansea North Substation ('Substation') (comprising a 400 kilovolt (kV) and 132 kV substation) and Felindre Gas Compressor Station. There is also a network of electricity pylons, underground utilities and overhead lines which lead to and from the Substation. The Felindre Water Treatment Works is located to the northwest, while the Cefn Betingau Solar Park and Abergelli Solar Farm are located to the east of Gas Connection. A further three solar parks are built in the vicinity; Lletty-Morfil Solar Farm, Brynwhilach Solar Park and Gelliwern Isaf Solar Park.
- 2.2.3 Other features of the area include public footpaths, bridleways and tracks located in and around the Gas Connection, linking it to the wider area. Of particular note is the Public

Right of Way (PRoW) LC35B, which crosses the Gas Connection. There are a number of residential properties between 600 m and 875 m from the Gas Connection. These include Cefn-betingau to the east, Feline Wen Farm and Llwynhelig to the south east, Maes-eglwys to the south, and Lletty-Morfil Farm and Abergelli Farm to the west.

- 2.2.4 There is a paintball activity centre located to the west of the Gas Connection off the B4489. Other tourist attractions and resources include the Cwm Clydach Nature Reserve woodland and nature reserve at Clydach, 3 km east of the Gas Connection and the National Cycle Route 43, which passes through Clydach on route to Swansea from Builth Wells.
- 2.2.5 There are a number of Sites of Nature Conservation Interest (SINCs) adjacent to the Gas Connection including:
- The Lletty-Morfil SINC (no. 106) to the east;
  - The Rhos Fawr SINC (no.316) to the north across the Rhyd-Y-Pandy road from the Gas Connection.
  - The Rhyd-Y-Pandy SINC (no. 315) is 130 m to the east; and
  - Waun Garn Wen SINC (no. 105) 250 m to the west.
- 2.2.6 There is an area of Ancient Woodland that partially coincides with the Lletty-Morfil SINC and surrounds the Substation and the Gas Compressor Station to the west of the Gas Connection. There is also an area of Ancient Woodland to the east and a Wildlife Trust Reserve (Coed Barcud) to the north east. The Mawr Uplands Special Landscape Area (SLA) is located within 5 km of the Gas Connection, extending from the north-west round to the east.

## 2.3 Planning History

- 2.3.1 Abergelli Farm has previously been subject to a series of planning applications for mineral extraction, an electricity generation facility, inert landfill and other commercial activities.
- 2.3.2 Swansea City Waste Disposal Company Ltd gained planning permission for the excavation and removal of inert material from a landfill site and restoration at Abergelli Farm in February 2003 (CCS Ref: 2002/0312), approx. 100 m to the west of the Gas Connection Site. An application to amend Condition 1 of this consent to allow the excavation and removal of inert material until 31st December 2010 (2007/0907) was submitted in December 2007, however the application was undetermined and the works have ceased.
- 2.3.3 In May 2003, planning permission was granted for the change of use of land at Abergelli Farm from agricultural use to a horse racing training/facility ground (CCS Ref: 2003/0561), adjacent to the west of the Gas Connection Site. Subsequently, CCS granted outline planning permission at this site for the construction of a stable block in August 2004 (CCS Ref: 2004/0415) and for the construction of two detached dwelling houses to provide Horse Trainers and Stable Hands accommodation (CCS Ref: 2004/0329). This permission has been implemented and remains operational.
- 2.3.4 Abergelli Glas Ltd gained planning permission for a 10 MW solar farm, inverter substations and 2.4m high fencing at land at Abergelli Farm, adjacent to the north-east of the Gas Connection Site in May 2013 (CCS Ref: 2013/0135). This consent has since been the subject to a number of Non-Material Amendment (NMA) applications. An NMA was first submitted to reduce the number of buildings, solar panels, height of fence, height of

framework and to omit the met mast (CCS Ref: 2014/1313/NMA), and was granted permission on 28/10/2014. A subsequent application was submitted in September 2014 (2014/1335/DOC) seeking to discharge condition 5 of permission 2013/0135. The application was granted in December 2014. The consent for the solar farm has been implemented and the solar farm is operational.

- 2.3.5 In October 2015, planning permission was refused for an "Emergency standby electricity generation facility comprising: modern modular diesel generator units (up to 14 in total), transformers, diesel storage tanks, boundary treatment including acoustic screening, access improvements and associated works" at land adjacent to the west of the Gas Connection Site (CCS Ref: 2015/1716). The application was refused on the basis that, in the Council's view, the positive benefits of the development would not outweigh the visual harm to the countryside caused by it.

## 2.4 Environmental Effects

### a) Potential Effects

- 2.4.1 The Gas Connection Environmental Report outlines the environmental designations and potential environmental effects from the Gas Connection, including effects on:

- Ecology;
- Flood Risk and Water Quality
- Air Quality;
- Noise;
- Landscape and Visual;
- Historic Environment;
- Traffic, Transport and Access; and
- Geology and Ground Conditions.

### b) Mitigation

- 2.4.2 Mitigation has been identified within the EIA carried out for the Project which is applicable to the Gas Connection. This mitigation includes both embedded mitigation (mitigation inherent in to the design of the Project and also specifically to the Gas Connection), or additional mitigation (which is required to mitigate any residual adverse effects of the Project). This is presented in Appendix 2.1 of the Gas Connection Environmental Report.

### 3. The Gas Connection

#### 3.1 Introduction

- 3.1.1 The Gas Connection will be in the form of a new above ground installation (AGI) and underground gas connection (the Gas Pipeline). This is to bring natural gas to the Project from the National Gas Transmission System. Gas will be transported at a suitable rate and pressure to produce up to 299 Megawatt (MW) when the Power Station is in use. The AGI will comprise a Minimum Offtake Connection (MOC) facility, which will be owned by National Grid; and a Pipeline Inspection Gauge (PIG) Trap Facility (PTF), which will be owned by APL.
- 3.1.2 The AGI (both the MOC and PTF) will be located on the southern side of the Rhyd-y-pandy Road leading to Felindre. Once complete, maintenance access for the AGI will be from the Rhyd-y-pandy Road via a short, purpose built tarmacadam access track (see Figure 2 and Figure 3). The Gas Connection will then follow a route corridor shown on Figure 2: Site Layout Plan, running in southerly direction to the Abergelli Power Station. It will be approximately 1.4 km in length. It will cross the National Gas Transmission System in two locations, a Public Right of Way (LC35B), two private farm tracks and one ditch (field drain). Termination of the Gas Connection will be at a second PTF located at the Abergelli Power Station.

**Table 3.1: Maximum Parameters of Gas Connection Above-Ground Structures.**

Structure	Maximum Height (m)	Maximum Length (m)	Maximum Width (m)
Above ground installation (AGI)	3	85	35
Minimum offtake connection (MOC)	3	35	35
Gas Pipeline inspection gauge facility	3	35	35

#### 3.2 Construction

- 3.2.1 The Gas Connection includes both the Gas Pipeline together with its connection with the AGI. The route for the actual Gas Pipeline will be marked out, topsoil stripped and moved to one side and the trench excavated. The exact construction method for the Gas Pipeline will be subject to further survey and dependant on the National Gas Transmission System depth and ground conditions.
- 3.2.2 Construction of the Gas Pipeline would likely take place within a temporary fenced strip of land called the 'working width'. The working width is required to facilitate safe construction and the protection of off-site receptors.
- 3.2.3 It is likely that the working width would be 30m along the length of the Gas Pipeline route, although it may be necessary to increase / decrease the working width at specific points. For example, adjacent to road and water crossings it may be necessary to increase the working width to provide additional working areas and storage for materials or special plant. Alternatively, adjacent to areas of conservation or existing services it may be necessary to decrease the working width to reduce potential impacts.
- 3.2.4 Aside from the special crossings, for example, water and road crossings, where trenchless techniques (e.g. Horizontal Directional Drilling, HDD) may be used to reduce impact on

sensitive areas, it is expected that the Gas Pipeline would be constructed using standard open-cut cross-country pipeline construction techniques.

- 3.2.5 The Gas Pipeline will be delivered in spools and laid out along the route before welding into a string. The sections of pipe would then be lowered into the trench using side arm booms and backfilled for testing. Where the Gas Pipeline route crosses the National Gas Transmission System, an appropriate method of crossing will be undertaken which affords the appropriate level of protection to the National Gas Transmission System at its existing depth. This may include open cut techniques or a trenchless crossing such as HDD.
- 3.2.6 After the Gas Pipeline is laid, the excavated material and topsoil will be returned to its original position. The surface will then be seeded to restore it to its original state.
- 3.2.7 Gas systems skids will be placed and piping connected before commissioning the Gas Pipeline, pressure regulators and metering.
- 3.2.8 The Gas Connection will cross an existing PRoW LC35B. During construction, temporary closure(s) of all or part of the footpath and restriction of the use of the footpath may be required in order to ensure user safety. Details of how these temporary arrangements will be managed will be supplied in supporting management plans. It is not envisaged that the PRoW will be stopped up.

### 3.3 Operation and Maintenance

- 3.3.1 The Gas Connection would remain operational for the entire lifetime of the Project. No parts of the Gas Connection would be manned. Telemetry apparatus (both within the Gas Pipeline trench and at the AGI) would report back any issues to a central control room. Should any issues be identified, the Gas Pipeline would be isolated and the supply switched off, pending investigation of any faults. Access to the AGI during maintenance / repair would be via a new permanent access off Rhyd-y-pandy Road.
- 3.3.2 The primary maintenance and inspection activities would be as follows:
  - Visual checks;
  - In-line inspection;
  - Cathodic protection checks; and
  - Valve operation checks.

### 3.4 Decommissioning

- 3.4.1 It is assumed that the Gas Connection would be decommissioned after 25 years, which is the design life of the Power Generation Plant. However, it is important to note that elements of the Connection would be owned and operated by a third party. In accordance with its statutory duties, National Grid may use these assets in the future as part of its wider network.
- 3.4.2 As such, though the date of decommissioning of some elements of the Gas Connection cannot be certain, a 25 year working assumption has been used to allow for a reasonable assessment of decommissioning effects.
- 3.4.3 Finally, it is assumed that elements of the Gas Connection may be left in situ at the point of decommissioning, as this approach is likely to cause less environmental effects than removal.

### 3.5 The Need for the Gas Connection

- 3.5.1 The urgent need for energy generation, including gas fired generating stations and gas fired peaking plants, is set out within NPS EN-1, the Gas Generation Strategy (DECC, 2012), the National Infrastructure Plan (HM Treasury, 2014) and Energy Wales – a Low Carbon Transition (2012). In the Annual Energy Statement (AES) (latest version published in 2014), the Department of Energy and Climate Change (DECC) (now SoS for BEIS) reiterated the need to build new power generation infrastructure and acknowledged the need for gas to feature strongly in the energy mix. The Project (including the Gas Connection) would contribute materially to the short and medium term need for flexible, reliable, peak load power generation and facilitate the transition to a low carbon economy. The chosen technology for a peaking plant would help to ‘balance out’ the grid at times of peak electricity demand and help to support the grid at times when intermittent renewable sources cannot generate electricity. The construction and operation of the Project would benefit the local economy. It is projected that the Project will deliver positive socio-economic impacts on the labour market at the construction and decommissioning phases through the creation of local jobs and contribution to Gross Value Added (GVA).
- 3.5.2 It is further projected that should the construction, decommissioning or operation occur simultaneously with any other projects in the area, that this would provide a positive stimulus to the local economy through the provision of construction-related training and employment opportunities, supply chain linkages and demand for accommodation, food and drink services.

## 4. Design Analysis

### 4.1 Introduction

4.1.1 TAN 12 and the DCfW guidance on DAS documents promote the key objectives of good design under the following headings:

- Character;
- Access;
- Movement;
- Environmental sustainability;
- Community safety;
- Other considerations; and
- Response to planning policy.

4.1.2 The way in which each key objective has been considered and addressed in the design of the scheme is outlined below.

### 4.2 Character

4.2.1 The majority of the Gas Connection is underground. The design and elevations of the AGI are presented in Figure 4. Post-construction, structure planting and reinstatement boundary vegetation will be planted around the AGI to assist in assimilating it within the immediate landscape pattern. Planting will extend up to existing field boundaries in order to retain the field pattern and avoid land severance.

4.2.2 Once the structure planting around the AGI establishes it will assist in providing some additional structure to the landscape which alongside the reinstatement of hedgerow planting and fields returned to grazing along the route of the Gas Pipeline, will assist in integrating the Gas Connection into the local landscape. Following decommissioning, the landscape would be restored.

### 4.3 Access and Movement

4.3.1 During operation, the Gas Connection will not be manned, but regular maintenance operations will be undertaken. Access to the AGI during operation would be via a new permanent access off Rhyd-y-pandy Road, via a short, purpose built tarmacadam access track as located in Figure 2 and in more detail in Figure 3.

4.3.2 The Gas Connection will cross an existing PRoW LC35B. During construction, temporary closure(s) of all or part of the footpath and restriction of the use of the footpath may be required in order to ensure user safety. Details of how these temporary arrangements will be managed will be supplied in supporting management plans. It is not envisaged that the PRoW will be stopped up.

### 4.4 Environmental Sustainability

4.4.1 APL has sought to employ good design at all stages of the development. APL has undertaken suitable studies of the local habitats, accesses, heritage features and landscape to enable the design to respond to place. Suitable setbacks and



replacement/reinforcement and new planting is proposed to integrate the Project, including the Gas Connection into its local ecological and landscape context and provide mitigation for habitat loss.

- 4.4.2 Impacts on the drainage regime of the local area will be minimised through the provision of ponds and other natural and semi natural features providing ecological mitigation. Careful management of soils during construction works. Full details of ecological and landscape mitigation are provided in the accompanying environmental reports.

## 4.5 Community safety

- 4.5.1 The Gas Connection would be designed and developed to high quality, safety and environmental standards. Construction of the Gas Pipeline would likely take place within a temporary fenced strip of land called the 'working width'. The working width will ensure safe construction and the protection of off-site receptors.

## 4.6 Other considerations

- 4.6.1 Full details of embedded mitigation are provided in the accompanying environmental reports.

## 4.7 Response to planning policy

- 4.7.1 The response to planning policy is considered in Section 5 of this PDAS.



## 5. Planning Policy Context

### 5.1 Introduction

- 5.1.1 This section of the Planning Statement provides a summary of the relevant planning policy framework and an assessment of compliance with planning policy by the Gas Connection.

### 5.2 National Planning Policy

- 5.2.1 The following policy/guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

#### a) Wales Spatial Plan

- 5.2.2 People, Places, Futures the Wales Spatial Plan (WSP) Update 2008 was approved by the National Assembly for Wales in July 2008. The Wales Spatial Plan aims to deliver sustainable development through its area strategies in the context of the Welsh Government's Sustainable Development Scheme and sets out cross-cutting national spatial priorities. The Spatial Plan area which the Gas Connection Site falls under is "Swansea Bay – Waterfront and Western Valleys".
- 5.2.3 Chapter 11 recognises that the economy in Wales has a spatial dimension. Paragraph 11.1 recognises that while some areas adjoining the English border have economic performance characteristics fairly similar to the UK average, the more western areas and the former coal-mining areas lag behind.
- 5.2.4 Paragraph 11.6 acknowledges the need to take a joint approach with local authorities, travel consortia, and others to tackling regional infrastructure problems on issues of housing, transport, water, sewerage, energy, waste and ICT.
- 5.2.5 Chapter 20 relates specifically to the area of "Swansea Bay – Waterfront and Western Valleys" where the Gas Connection Site is located. Paragraph 20.1 sets out a number of key priorities for the region, including: "improving accessibility", "developing a cutting edge knowledge economy", "reducing economic inactivity" and "ensuring that environmental protection and enhancement are fully integrated".
- 5.2.6 The Gas Connection would facilitate low carbon generation and associated employment generation. Accordingly, the Gas Connection is considered to support the objectives of the WSP.

#### b) Planning Policy Wales 9<sup>th</sup> Edition, November 2016

- 5.2.7 Planning Policy Wales (PPW) forms the overarching national planning policy document for Wales and sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). PPW provides guidance on a range of land use planning matters.
- 5.2.8 PPW Chapter 4, 'Planning for Sustainability', sets out the principles and objectives underpinning the Welsh Government's approach to planning policy for sustainable development.
- 5.2.9 PPW paragraph 4.2.2 highlights that the planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental

issues are balanced and integrated. PPW Section 4.4 outlines the objectives for the planning system which reflect the Welsh Government's view for sustainable development and the outcomes they seek to deliver across Wales. This includes playing an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including energy supplies and distribution networks, promoting good environmental management and best environmental practice, promoting a low carbon economy and social enterprises, contributing to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems.

- 5.2.10 PPW Chapter 5 'Conserving and Improving Natural Heritage and the Coast' sets out the Welsh Government's overarching advice on the conservation of biodiversity and the coast in a planning context. The chapter sets out objectives for conservation that should be delivered via the planning process. It includes guidance on integrating the requirements of development and conservation, and highlights existing measures for biodiversity conservation in Wales.
- 5.2.11 For planning purposes, Chapter 7 of PPW defines economic development as development of land and buildings for activities that generate wealth, jobs and incomes. PPW paragraph 7.1.1 advises that economic land uses include the traditional employment uses (Class B in the Use Classes Order) as well as retail, tourism and public services. It is stated in paragraph 7.1.1 that the construction and energy sectors are important to the economy and sensitive to planning policies.
- 5.2.12 Chapter 12 of PPW 'Infrastructure and Services' emphasises the importance of infrastructure projects to Wales: "Adequate and efficient infrastructure, including services such as education and health facilities along with water supply, sewers, waste management, electricity and gas (the utilities) and telecommunications, is crucial for the economic, social and environmental sustainability of all parts of Wales" (paragraph. 12.1.1). The Welsh Government aims to secure the environmental and telecommunications infrastructure necessary to meet sustainable development objectives, which are listed in paragraph 12.1.4 of PPW. The objectives considered to be relevant for the purposes of the Gas Connection are listed as follows:
- To promote the generation and use of energy from renewable and low carbon energy sources at all scales and promote energy efficiency, especially as a means to secure zero or low carbon developments and to tackle the causes of climate change; to promote an integrated approach to the provision and renewal of environmental and telecommunications infrastructure;
  - To ensure that environmental and telecommunications infrastructure is provided in such a way as to enable sustainable development objectives to be met, avoiding adverse impacts on the environment (including the natural and historic environment), local communities and health;
  - To ensure that in considering environmental and telecommunications infrastructure account is taken of the impacts of climate change in the location, design, build, operation and, where appropriate, the decommissioning of new infrastructure; and
  - To ensure that the vulnerability of infrastructure to severe weather events is minimised and that infrastructure is designed to cope with higher average temperatures and increasing risk of storm surges, drought and flooding.
- 5.2.13 Paragraph 12.8.6 of PPW outlines that it is the Welsh Government's aim to, "secure an appropriate mix of energy provision for Wales which maximises benefits to our economy and communities, whilst minimising potential environmental and social impacts. This forms

part of the Welsh Government's aim to secure the strongest economic development policies to underpin growth and prosperity in Wales recognising the importance of clean energy and the efficient use of natural resources, both as an economic driver and a commitment to sustainable development".

- 5.2.14 For the purposes of planning policy, paragraph 12.8.7 of PPW defines "low carbon energy" as the term used to cover technologies that are energy efficient (but does not include nuclear). PPW figure 12.2 sets out the scales of development, for planning purposes, for low carbon and renewable energy projects. It acknowledges that an energy project is deemed to be "strategic" when it exceeds a threshold of 50 MW for all technologies other than onshore wind.
- 5.2.15 PPW Chapter 13 'Minimising and Managing Environmental Risks and Pollution' is concerned with maximising environmental protection for people, natural and cultural resources, property and infrastructure; and preventing or managing pollution and promoting good environmental practice (paragraph 13.1.2).

#### c) Technical Advice Notes

- 5.2.16 TAN 12 'Design' (2016) sets out the objectives of good design and aims to encourage good design in all aspects of development, stating that: "The way which development relates to its urban or rural landscape context is critical to its success". The aim should be to achieve good design solutions, which maximise the natural landscape assets and minimise environmental impact on the landscape. It is particularly important that proposals to amend or create new landscape are not considered as an afterthought and that the long-term impact of development on the landscape is fully understood.
- 5.2.17 TAN 5 'Nature conservation and Planning' (2009) is concerned with the protection of statutorily designated site and habitats, the conservation of protected and priority species; and protecting and enhancing biodiversity and nature conservation in the wider countryside within Wales.
- 5.2.18 TAN 15 'Development and Flood Risk' (2004), provides a precautionary framework to guide planning decisions within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.
- 5.2.19 TAN 11 'Noise' (1997), which provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main considerations which LPAs should take into account in determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 5.2.20 TAN 18 'Transport' (2007) provides guidance on issues relating to sustainable development through transport. TAN 18 describes how to integrate land use and transport planning and explains how transport impacts should be assessed and mitigated.
- 5.2.21 TAN 23 'Economic Development' (2014) refers to the concept of "larger than local planning", which advises that market forces do not respect local authority boundaries and therefore the planning system should ensure that it steers development to the most efficient and sustainable locations. This means that strategic planning for economic development is essential. Paragraph 2.1.1 addresses the need to weigh economic benefits and states that it should not be assumed that economic objectives are necessarily in

conflict with social and environmental objectives. The TAN advises that the planning system should positively and imaginatively seek win-win outcomes.

#### d) Summary of Compliance with National Planning Policy

- 5.2.22 The Gas Connection will facilitate the provision of low carbon energy generation and positive economic benefits and employment generation, whilst demonstrating high-quality design and mitigating potential environmental impacts as described in this PDAS and the accompanying reports. It seeks to avoid significant harm to biodiversity and geological conservation interests and incorporates a number of embedded mitigation measures in its design and construction. There would be no long term impact on any mineral resources in the area during the operation of the Gas Connection. Wherever practicable, possible waste will be avoided; however, where necessary, waste will be managed in accordance with the waste hierarchy. Overall, it is considered that the Gas Connection is in accordance with PPW and its accompanying TANs.

### 5.3 Local Planning Policy

#### c) The Development Plan

##### i. *City and County of Swansea Unitary Development Plan (Adopted November 2008)*

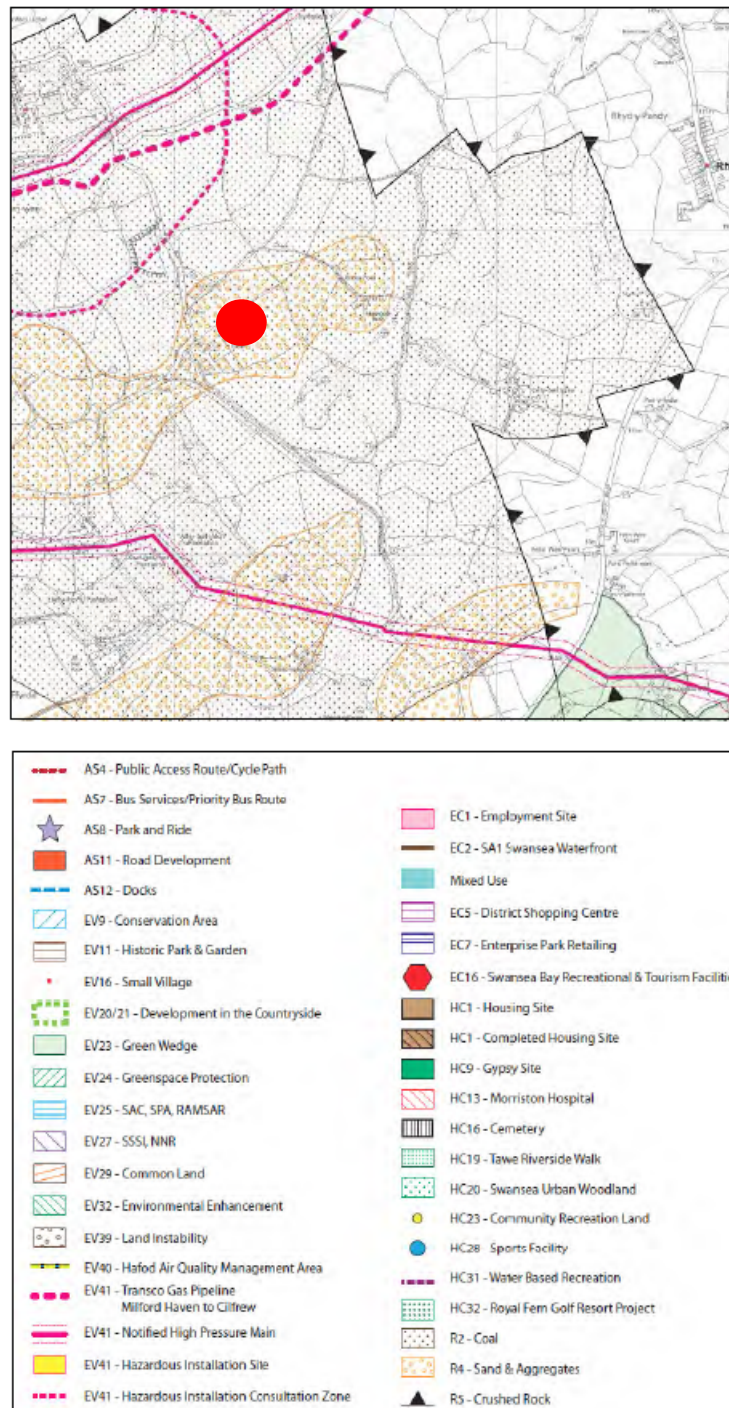
- 5.3.1 The CCS Unitary Development Plan Document (UDP) was adopted in November 2008 and comprises the Development Plan for the area.

##### ii. *UDP Proposals Map & Key Site-Specific Policies*

- 5.3.2 As shown on the UDP Proposals Map (Figure 5), the Gas Connection Site is located on land identified as “Coal” and “Sand and Aggregates”, where UDP Policies R2 and R4 respectively apply. Policy R2 states that development proposals that would affect the working of known potential resources will have to be accompanied by a full assessment of the potential resource and the impact of the proposal in terms of sterilising the resource. Similarly, Policy R4 states that development proposals that would affect the working of known potential mineral resources will have to be accompanied by a full assessment of the potential mineral resource and the impact of the proposal in terms of sterilising the resource.
- 5.3.3 The Gas Connection Site is also located adjacent to the south of a Hazardous Installation Consultation Zone and approximately 200m to the north of a Notified High Pressure Mains Buffer, where UDP Policy EV41 applies. Policy EV41 states that development of land in the vicinity of existing hazardous installations will not be permitted if there would be a significant risk to life or health.
- 5.3.4 Approximately 300m to the east of the Gas Connection Site, and therefore not affected by the Gas Connection or indeed any component of the Project, is land identified as having known potential for “Crushed Rock” mineral resources, where UDP Policy R5 applies. Policy R5 states that development proposals that would affect the working of known potential mineral resources will have to be accompanied by a full assessment of the potential mineral resource and the impact of the proposal in terms of sterilising the resource.



Figure 5: Extract from the UDP Proposals Map and Legend (Approximate centre of the site illustrated in red)



### iii. Development Proposals in the Surrounding Area

- 5.3.5 Policy EC1 allocates 190 ha of employment land at Felindre Strategic Business Park, located approximately 1.5 km to the south-west of the Gas Connection Site, in order to meet the growth needs of the local economy. Policy HC1 allocates land at Tircoed, Penllergaer, located approximately 2.5 km to the south-west of the Gas Connection Site, for the delivery of 84 units.

#### *iv. Other Relevant UDP Policies*

- 5.3.6 The UDP Written Statement sets out the broad vision and strategy for development and conservation together with more detailed policies and development proposals. In addition to the site-specific policies set out above, the following UDP policies are also considered to be relevant.
- 5.3.7 The vision for the UDP is for “A sustainable approach to the development of a prosperous region focused on a cosmopolitan and multi-cultural City and County, which capitalises on its waterfront location. The strategy will be based on the conservation of the best we have, whilst making effective provision for the promotion of employment, good housing, shopping, leisure, tourism, community and education facilities in a safe, accessible, innovatively designed, healthy, ecologically rich and visually attractive environment.”
- 5.3.8 Strategic Policy SP1 states that “sustainable development will be pursued as an integral principle of the planning and development process”.
- 5.3.9 Strategic Policy SP2 states that “the countryside will be protected and conserved...” Strategic Policy SP2 also states that the natural, built, and cultural heritage of the County will be protected and enhanced to safeguard from materially harmful development.
- 5.3.10 Policy SP10 states that “Mineral resources will be conserved as far as possible. Mineral development will be limited to that which is essential for economic growth, with associated environmental disturbance kept to a minimum. Restoration and aftercare will be required to be of a high quality. Within areas of significant environmental sensitivity, mineral development will be resisted.”
- 5.3.11 Strategic Policy SP11 states that: “the upgrading of infrastructure provision and the generation of energy from renewable resources to meet the needs of existing and new development will be favoured, provided that environmental impact is kept to a minimum”. Strategic Policy SP12 states that the Council will encourage development that makes “efficient use of resources and energy”.
- 5.3.12 Policy EV1 states that new development should accord with a number of objectives of “good design”. Policy EV2 states that new development should have regard to the physical character and topography of the site and its surroundings.
- 5.3.13 Policy EV3 states that proposals for new development will be required to, “provide access and facilities for all” and “contribute to a high quality public realm”. Policy EV6 states that the Council will seek to “protect, preserve and enhance” Scheduled Ancient Monuments (SAMs) and their settings, and unscheduled archaeological site and monuments and their settings. Where proposals affect sites and areas of archaeological potential, applicants are required to undertake an assessment of the impact of development and set out measures to preserve, enhance and record features of archaeological interest. Whilst there are some SAMs located within the 5 km study area, there are none within the Gas Connection Site.
- 5.3.14 Policy EV12 states that: “The character of lanes and public paths that contribute to the amenity, natural and historic qualities of an area will be protected... In rural areas, the design of any necessary works should be appropriate to the character of the area and should not detract from the landscape or suburbanise the area.”
- 5.3.15 Policy EV21 states that non-residential development in the countryside will only be permitted in certain circumstances. Part (v) of the policy lists development essential for

communications, telecommunications, other forms of utility service provision, minerals or renewable energy generation as an exceptional circumstance.

- 5.3.16 Policy EV22 states that the countryside will be “*conserved and enhanced for the sake of its natural heritage, natural resources, historic and cultural, environment and agricultural and recreational value*” through the control of development and practical management and improvement measures.
- 5.3.17 Policy EV30 states that encouragement will be given to the “protection and improved management of woodlands, trees and hedgerows which are important for their visual amenity, historic environment, natural heritage and/or recreation value.” Priority will be given to: “(i) protecting the remaining areas of ancient semi natural woodland and planted ancient woodland sites; (ii) promoting new planting with species appropriate to the location...; and (iii) ensuring that protection of amenity interests is achieved where management involves commercial felling and replanting.”
- 5.3.18 Policy EV38 states that development proposals on land where there is a risk from contamination or landfill gas will not be permitted unless it can be demonstrated that “measures can be taken to satisfactorily overcome any danger to life, health, property, controlled waters, or the natural and historic environment.”
- 5.3.19 Policy EV40 states that development proposals will not be permitted that would “cause or result in significant harm to health, local amenity, natural heritage, the historic environment or landscape character because of significant levels of air, noise or light pollution.”
- 5.3.20 Policy EC1 allocates 190 ha of employment land at Felindre Strategic Business Park, located approximately 1.5 km to the south-west of the Gas Connection Site, in order to meet the growth needs of the local economy. Policy HC1 allocates land at Tircoed, Penllergaer, located approximately 2.5 km to the south-west of the Gas Connection Site, for the delivery of 84 units.
- 5.3.21 Policy EC13 states that development that would result in the loss of the best and most versatile agricultural land will not normally be permitted. The application site comprises Grade 4 agricultural land and therefore best and most versatile land will not be affected by the Gas Connection.
- 5.3.22 Policy R16 states that “proposals for major new developments will be required to incorporate adequate and effective waste management facilities.”
- 5.3.23 Policy AS2 states that new developments should be designed to “allow for the safe, efficient and non-intrusive movement of vehicles”. In addition, the means of access to new developments should be designed to ensure that impacts on the natural, historic and built environment and local communities are minimised.
- 5.3.24 Policy AS3 states that “development that adversely affects the safety, enjoyment and convenient use of a PRoW will only be permitted where an acceptable alternative route is identified.”
- 5.3.25 Policy AS10 requires new developments to “incorporate appropriate traffic management measures to mitigate significant adverse impacts that would otherwise be caused by traffic movements.”

## 5.4 Summary of Compliance with the Development Plan

- 5.4.1 The area is demonstrably suitable for power generation infrastructure and its location minimises the length of connection to the national gas networks and therefore construction impacts. The proposed development is supported by Policies SP11 and SP12 regarding infrastructure and energy generation and is in accordance with Policy EV21
- 5.4.2 The coal, sand and gravels reserves are considered to be of minimal economic use. While there will be permanent sterilisation of the reserves from the Gas, it is considered that a relatively small area of the reserves will be affected compared to the full extent available in the area. As a result, there will be no long term impacts on the mineral resource in the area. It is understood that there are no plans for mineral extraction within the vicinity of the site and the Gas Connection would not be in conflict in this regard. As such the proposals are considered to be compliant with the provisions of UDP Policies R2, R4, R5 and SP10. The Gas Connection also incorporates an appropriate waste management plan in accordance with Policy R16.
- 5.4.3 The Gas Connection Site is located adjacent to the south of a Hazardous Installation Consultation Zone and near to a Notified High Pressure Mains Buffer. However, it is expected that no significant effects would occur in respect of public health, in accordance with UDP Policy EV41. The Gas Connection would not impact on nearby strategic land allocations at EC1 and H1.
- 5.4.4 With regard to policies for sustainable development, the countryside, environmental protection and transport (Policies SP1, SP2, SP3, EV1, 2, 3, 6, 22, 30, 40, EC13, AS2, AS3 and AS10), the Gas Connection Site:
- Minimises its land take so far as practicable;
  - No best and most versatile land will be affected;
  - Is located away from homes and in an area of countryside that contains substantial amounts of energy infrastructure already;
  - Has been integrated into that landscape through careful siting, layout, design and landscape mitigation commitments;
  - Detailed mitigation measures are proposed;
  - No known heritage assets would be significantly affected;
    - The Gas Pipeline will cross the line of historic boundary AB03, necessitating the removal of a portion of this feature for the construction working width of the Gas Pipeline. However, only a small percentage of this feature is affected.
    - The construction working width of the Gas Pipeline will also run parallel to historic boundary AB04. However, this feature is 25 m from the Gas Pipeline centreline, and thus beyond the limits of the pipe easement.
  - Would be decommissioned at the end of its design life and the landscape restored;
  - No adverse impacts in terms of noise or air pollution are anticipated;
  - The existing PRoW (LC35B) will not be affected during the operation of the Gas Connection. During construction, temporary closure(s) of all or part of the footpath and restriction of the use of the footpath may be required in order to ensure user safety; and
  - Any impacts in respect of transport are not significant.



- 5.4.5 The Gas Connection is in general compliance with relevant UDP policies. Overall, the project would facilitate low carbon energy generation. The urgent need for electricity generation, including associated development connections, should be accorded substantial weight, as set out in national government guidance, national planning policy as well as local planning policy.

## 5.5 Emerging Planning Policy

### a) Emerging Planning Policy Wales

- 5.5.1 The Welsh Government published a draft version of PPW, Edition 10, in February 2018. Consultation on the draft closed in May 2018.
- 5.5.2 Within the consultation draft Edition 10, PPW has been restructured into policy themes in light of the Well-being of Future Generations (Wales) Act 2015 and policy updated to reflect new Welsh Government strategies and policies. Draft PPW Paragraphs 1.22 – 1.24 recognise the role of the planning system for transitioning to a low carbon economy and building resilience to climate impacts. Paragraph 1.22 acknowledges that “The planning system in Wales plays a key role in delivering clean growth and decarbonisation and is also crucial in building resilience to the impacts of climate change. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes.” Draft PPW Paragraphs 4.99 – 4.163 summarise the Welsh Government’s priorities for Energy. Draft PPW paragraph 4.99 states that “The Welsh Government is committed to delivering the outcomes set out in our Energy Policy Statement Energy Wales: A Low Carbon Transition (2012). Our priorities are:
- Reducing the amount of energy we use in Wales;
  - Reducing our reliance on energy generated from fossil fuels; and
  - Actively managing the transition to a low carbon economy.”
- 5.5.3 Draft PPW paragraph 4.101 states that “Planning applications for onshore generating projects in Wales which have an installed generation capacity of between 10MW and 50MW (there is no upper limit for onshore wind generating stations) are made directly to the Welsh Ministers.
- 5.5.4 Draft PPW paragraph 4.102 recognises the benefits of securing energy from a mix of energy sources, stating that “The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts.”
- 5.5.5 Draft PPW paragraphs 4.123 – 4.127 summarise the Welsh Government’s direction for renewable and low carbon energy. Paragraph 4.123 states that “Planning authorities should facilitate all forms of renewable and low carbon energy development, using up to date and appropriate evidence. Planning authorities should seek to ensure their area’s full potential for renewable and low carbon energy generation is achieved and renewable energy targets are met.”
- 5.5.6 Draft PPW paragraph 4.127 continues that “Planning applications for renewable and low carbon energy generation development, which are in accordance with development plan policies, should be supported.”

- 5.5.7 Draft PPW paragraphs 4.1.42 – 4.1.44 sets out the Welsh Government's approach to development management and renewable and low carbon energy. Paragraph 4.142 states that "In determining applications for the range of renewable and low carbon energy technologies, planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security".
- 5.5.8 The Welsh Government is currently considering the responses to the consultation on the Draft PPW Edition 10. The Welsh Government has advised that Edition 10 of PPW will be published towards the end of 2018. As the document remain in draft format and may be subject to change, it is not considered further in this PDAS.

#### **b) Emerging Wales National Development Framework (NDF)**

- 5.5.9 The NDF is currently being prepared by the Planning Directorate of Welsh Government and will set out a twenty-year land use framework for Wales and will replace the current Wales Spatial Plan. The NDF will set out where nationally important growth and infrastructure is needed and how the planning system can deliver it.
- 5.5.10 In April 2018, the Welsh Government published the NDF Issues, Options & Preferred Option - Consultation Paper (April 2018). Issue B addresses 'Climate Change, Decarbonisation and Energy'. The Paper states that "Our aim is to see the deployment of a wide range of renewable and low carbon technologies, at all scales, whilst recognising that gas will be a key transitional fuel." Page 8 of Appendix A to the Issues and Options Consultation states: "Our aim is to see the deployment of a wide range of renewable and low carbon technologies, at all scales, whilst recognising that gas will be a key transitional fuel."
- 5.5.11 Draft NDF Objective 3 – Climate change, Decarbonisation and Energy seeks
- "To enable the transition to a low carbon economy; to enable management of and adaption to the consequences of climate change; and to support decarbonisation in Wales and help deliver the Welsh Government's greenhouse gas emissions and renewable energy targets." (Draft NDF Appendix A – Issues, page 14).
- 5.5.12 Publication of the final NDF is anticipated for September 2020 and as a result, it is not considered further in this PDAS.

#### **c) Emerging Local Planning Policy**

- 5.5.13 CCS is currently in the process of preparing a new LDP, which upon adoption will replace the UDP as the key planning policy document for CCS up to 2025. CCS submitted the LDP to the Ministers of the Welsh Government for independent examination on 28th July 2017. Following formal acceptance on 4th August 2017, the Ministers of the Welsh Government appointed Inspectors to conduct the independent examination and to assess the soundness of the LDP. Examination hearings commenced on 6th February 2018 and ran until late March 2018.
- 5.5.14 Following formal closure of the examination hearings, the inspector's report will be prepared and submitted to the Council with recommendations regarding the LDP. It is anticipated the LDP would be formally adopted by CCS thereafter subject to the inspector's recommendations.

5.5.15 Prior to the commencement of examination hearings, the submitted LDP is considered to hold some weight for decision-making purposes based on the previous stages of preparation and consultation (listed above). At the closure of the examination hearings and following the publication of the inspector's report, the weight to be attached to the draft LDP may change based upon the inspector's recommendations. Upon adoption, the LDP would replace the UDP and receive full weight for decision-making purposes.

*i. CCS Draft LDP Proposals Map and site-specific policies*

5.5.16 As shown on the draft LDP Proposals Map (Figure 6), the Gas Connection Site is located on land identified as safeguarded "Coal Resources" and "Sand and Gravel" resource, where draft LDP Policy R12 applies. Draft Policy RP 12 states that "development within mineral safeguarding areas that would permanently sterilise identified resources of aggregates and coal will only be permitted where it can be demonstrated that:

- The extraction of the mineral is impracticable, uneconomic or environmentally unacceptable;
- The mineral has already been extracted or can be extracted satisfactorily prior to the development taking place;
- The scale and location of the development would have no significant impact on the potential working of the resource; or
- There is an overriding need for the development."

5.5.17 The Gas Connection Site is also located within proximity of a designated Mineral Buffer Zone, where draft LDP Policy RP 14 applies. Draft Policy RP 14 states that, aside from mineral extraction and sensitive non-mineral development, any other development proposals will be "carefully assessed to ensure that there would be no significant adverse effect on natural heritage, the amenity and well-being of neighbouring properties, or the quality and quantity of controlled waters."

5.5.18 To the north, the Gas Connection Site is located within proximity of a Landscape Protection Area, where Policy ER5 applies, and a Strategic Search Area, where Policy EU1 applies. Draft Policy ER 5 states that "development will not be permitted that would have a significant adverse effect on the character and quality of the landscape and setting of the County". Within Special Landscape Areas, including the Mawr Uplands to the north of the Gas Connection Site, priority will be given to protecting, managing and enhancing the character and quality of the area. Draft Policy EU 1 support proposals for large scale wind farms and their associated infrastructure within the Strategic Search Area.

5.5.19 To the south, the Gas Connection Site is located within proximity of a Strategic Development Area (Policy SD 1(G)) and safeguarded land at Morriston Hospital (Policy SI 4). Draft Policy SD G seeks to allocate a new sustainable settlement at land north-west of M4 J46 at Llangyfelach, to the south-west of the Gas Connection Site, for "comprehensive mixed use development of up to 850 homes during the Plan period, incorporating a mix of low-medium and high density residential, a new district centre with commercial units, primary school, a mix of public realm, open space and play provision, new community buildings, and a strategic business park."

5.5.20 In addition to the proposed sustainable settlement at Llangyfelach (Policy SD G), development at the following Strategic Development Areas within proximity of the Gas Connection Site is allocated within the submitted LDP:

- Draft Policy SD A seeks to allocate land south of Glanffrwd Road at Pontarddulais, to the west of the Gas Connection Site, for comprehensive, residential led, development

of up to 720 homes, incorporating a primary school, leisure and recreation facilities, public open space and appropriate community facilities, employment and commercial uses;

- Draft Policy SD C seeks to allocate land south of A4240, Penllergaer, to the south-west of the Gas Connection Site, for comprehensive, residential led, mixed use development of up to 750 homes during the Plan period (and up to 1,000 homes beyond the Plan period), incorporating primary school, leisure and recreation facilities, public realm, public open space and appropriate community and commercial uses; and
- Draft Policy SD E seeks to allocate land north of Clasemont Road, Morriston, to the south of the Gas Connection Site, for comprehensive, residential led, mixed use development of up to 675 homes during the Plan period, incorporating primary school, leisure and recreation facilities, public realm, public open space and appropriate community and commercial uses.

5.5.21 The following draft LDP policies seek to allocate major residential-led development at sites within proximity of the Gas Connection Site:

- LDP Policy H1.11 – 60 dwellings at Land at Ramsey Road, Clydach;
- LDP Policy H1.21 – 90 dwellings at Land east of Pontarddulais Road, Gorseinon;
- LDP Policy H1.26 – 100 dwellings at Land at Carmel Road and Bryntirion Road, Pontlliw;
- LDP Policy H1.30 – 50 dwellings at Land north of Llewellyn Road, Penllergaer; and
- LDP Policy H1.31 – 50 dwellings at Land at Bolgoed Road, Pontarddulais.

5.5.22 Draft Policy SI 4 safeguards land adjacent to Morriston Hospital, to the south-east of the Gas Connection Site, for future development, restricted to healthcare related uses associated with Morriston Hospital. Proposals are required to be “delivered alongside appropriate new and enhanced highway infrastructure that will significantly improve the existing substandard road access leading to the site”. A new access road is proposed as part of this proposal (Strategic Transport Strategy Table 9.2) to resolve road capacity issues from the roundabout immediately north of M4 J46.



Figure 6: Extracts from draft LDP Proposals Map (Map 13: Mawr) (Part i) (Approximate centre of the site indicated in red)

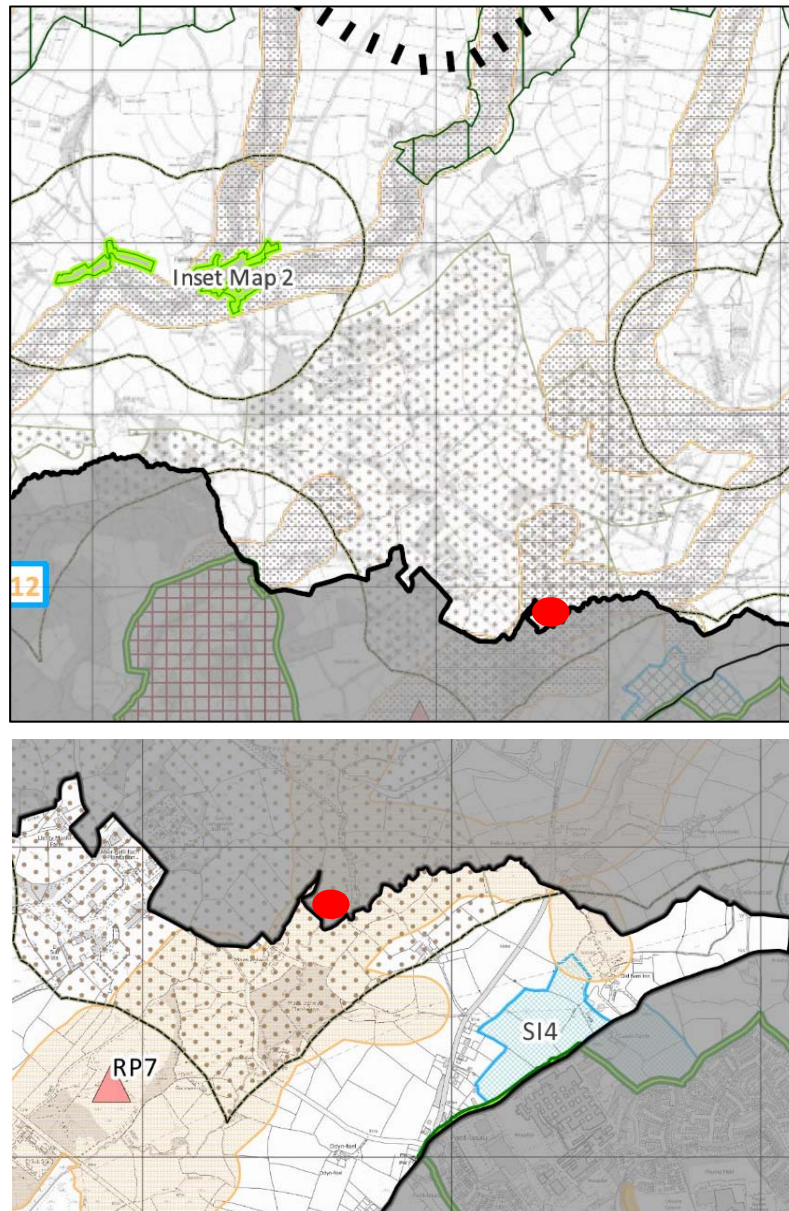


Figure 6: Extract from draft LDP Proposals Map (Map 13: Mawr) (Part ii)



## *ii. CCS Draft LDP - Written Statement*

- 5.5.23 The LDP Written Statement sets out a vision, strategic objectives, and growth strategy that address development opportunities and issues across the county. In addition to the site-specific policies set out above, the following draft LDP policies are also considered to be relevant.
- 5.5.24 Draft paragraph 1.2.2 sets out the overarching vision of the LDP, that “The County will be a desirable place to live, work and visit. The LDP vision will be delivered through a series of strategic objectives relating to “Enhancing Communities, Facilities & Infrastructure”, “Delivering Economic Growth and Prosperity”, and “Fostering a High Quality Environment”. Of the objectives set out in Figure 4 of the LDP, those relevant to the Gas Connection Site are set out below:
- Facilitate the provision of appropriate infrastructure to support communities and businesses;
  - Encourage appropriate development of low carbon and renewable energy resources and energy infrastructure;
  - Support the safeguarding and sustainable use of natural resources where appropriate;
  - Support development that positions Swansea as an economically competitive place and an economic driver for the City Region;
  - Facilitate growth and diversification of the local economy and an increase in high value, skilled employment;
  - Promote and enhance a diverse and sustainable rural economy;
  - Promote a sustainable development strategy that avoids significant adverse environmental impacts and respects environmental assets;
  - Maintain and enhance green infrastructure networks;
  - Support measures to minimise the causes and consequences of climate change; and
  - Promote good design that is locally distinct, sustainable, innovative and sensitive to location.
- 5.5.25 Draft Policy PS 1 sets out the Plan’s sustainable development strategy which seeks to limit development in the countryside to exceptional circumstances. Draft Policy PS 2 requires that development enhances the quality of places and spaces and responds positively to local context and character in terms of specific design principles.
- 5.5.26 Draft Policy PS 4 seeks to address opportunities for the creation of up to 14,700 additional jobs over the Plan period. Draft Policy IO 1 states that “development must be supported by appropriate infrastructure, facilities and other requirements considered necessary as part of the proposal,” which must be provided in a timely and coordinated manner. Where necessary, “planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.” Draft Policy IO 2 requires developers to “maximise added benefits from the development in relation to the creation of training and job opportunities.”
- 5.5.27 Draft Policy HC 1 seeks to preserve or enhance the County’s distinctive historic and cultural environment by requiring high quality design standards. Similarly, draft Policy HC 2 seeks to preserve or enhance the County’s buildings and features of historic importance.
- 5.5.28 Draft Policy SI 1 states that health inequalities will be reduced and healthy lifestyles encouraged by ensuring that development proposals, inter alia, “do not result in significant risks to life, human health or well-being, particularly in respect of air, noise, light, water or land pollution.”

- 5.5.29 Draft Policy ER 1 requires that development proposals take into account the following principles to mitigate against the effects of climate change, adapt to its impacts, and to ensure resilience:
- i. Reduce carbon emissions;
  - ii. Protect and increase carbon sinks;
  - iii. Adapt to the implications of climate change at both a strategic and detailed design level;
  - iv. Promote energy and resource efficiency and increase the supply of renewable and low carbon energy;
  - v. Avoid unnecessary flood risk by assessing the implications of development proposals within areas susceptible to flooding and preventing development that unacceptably increases risk, and
  - vi. Maintain ecological resilience.
- 5.5.30 Draft Policy ER 2 requires that development to maintain or enhance the County's multi-functional green infrastructure network. Draft Policy ER 6 states that "development will not be permitted that would result in a likely significant adverse effect to sites of international or national nature conservation importance". In addition, "development that would affect locally designated sites of nature conservation importance should maintain or enhance the nature conservation interest of the site."
- 5.5.31 Draft ER 8 states that development proposals that would have a significant adverse effect on the continued viability of habitats and species will only be permitted where:
- i. "The need for development outweighs the nature conservation importance of the site";
  - ii. The developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts;
  - iii. Effective mitigation measures are provided by the developer; and
  - iv. Any unavoidable harm is minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area."
- 5.5.32 Draft Policy ER 9 states that development proposals "will be expected to maintain, protect and enhance ecological networks and features of importance for biodiversity...Development proposals that could result in a significant adverse effect on the connectivity of ecological networks and features of importance for biodiversity will only be permitted where:
- i. The need for the development outweighs the nature conservation value of the site;
  - ii. It can be demonstrated that there is no satisfactory alternative location for the development;
  - iii. A connected element of the natural resource is retained as part of the design of the development; and
  - iv. Compensatory provision will be made of comparable ecological value to that lost as a result of the development."
- 5.5.33 Draft Policy ER 10 states that development will not be permitted that would cause significant adverse effect to geological or geomorphological Sites of Special Scientific Interest (SSSIs). Development that would affect regionally important geological or geomorphological sites (RIGs) should maintain the geological or geomorphological interests of the site. Draft Policy ER 11 states that "development that would adversely affect trees, woodlands and hedgerows of public amenity, natural/cultural heritage value, or that provide important ecosystem services will not normally be permitted."

- 5.5.34 Draft Policy CV 2 sets a presumption against development in the countryside, except where it is for “necessary infrastructure provision”. Development in the countryside is required to ensure that the integrity of the countryside is conserved and enhanced.
- 5.5.35 Draft Policy T 1 requires that “development must be supported by appropriate transport measures and infrastructure”. Development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted.
- 5.5.36 Draft Policy T 5 sets out a series of design principles for transport infrastructure, including ensuring that the design of development Draft Policy T 7 requires that acceptable alternative routes are identified and provided where development “significantly adversely affects the character, safety, enjoyment and convenient use of a Public Right of Way (PRoW).”
- 5.5.37 In addition to supporting large scale wind farm developments within the Strategic Search Area (referenced above), draft Policy EU 1 supports proposals for renewable or low carbon energy development across CCS, subject to the following criteria:
- a) “The siting, design, layout, type of installation and materials used do not have a significant adverse effect on the characteristics and features of the proposed location;
  - b) The development would not result in unacceptable loss of public amenity or public accessibility to the area;
  - c) The development would not result in significant adverse effects on natural heritage or historic environment, or visual amenity either individually or cumulatively;
  - d) There would be no significant adverse effect on the Gower AONB;
  - e) There would be no significant adverse impact on water quality and quantity;
  - f) The development would not result in the permanent sterilisation of minerals resources;
  - g) The development would not compromise the transport network;
  - h) The development would not interfere with aircraft operations or telecommunications;
  - i) There would be no loss of carbon sinks, or that on-site loss can be adequately mitigated; and
  - j) The satisfactory removal of infrastructure and remediation and/or restoration of the natural environment, would be undertaken in accordance with an aftercare scheme to be agreed with the Council prior to the development being carried out.”
- 5.5.38 Draft Policy RP 1 seeks to prevent development that would result in a “significant risk to: life; human health and well-being; property; controlled waters; or the natural and historic environment,” particularly in respect of: “air, noise or light pollution; flood risk; water resources; land contamination; land instability or subsidence; mineral resources; and sustainable waste management.”
- 5.5.39 Draft Policy RP 2 requires that, “where development could lead to exposure to a source of air, noise or light pollution, it must be demonstrated that appropriate mitigation measures will be implemented and incorporated into the design of the development.”
- 5.5.40 Draft Policy RP 3 states that “development that compromises the quality of the water environment, or does not comply with good water resource management, will not be permitted. Development proposals must make efficient use of water resources and, where appropriate, contribute towards improvements to water quality.”
- 5.5.41 Draft Policy RP 4 states that development will not be permitted in areas at risk of flooding, unless it can be demonstrated that “the development can be justified in line with national



guidance and is supported by a technical assessment that verifies that the new development is designed to alleviate the threat and consequences of flooding”.

- 5.5.42 Draft Policy RP 5 states that “development proposals on land where there is a risk from contamination or landfill gas will not be permitted unless it can be demonstrated that measures can be taken to satisfactorily overcome any significant risk to life, human health, property, controlled waters, or the natural and historic environment.”
- 5.5.43 Draft Policy RP 7 supports the development of sustainable waste management facilities in appropriate rural locations. Supporting paragraph 2.14.48 notes that preferred areas for new waste management facilities include the former Tip site at Felindre, within proximity of the Gas Connection Site. The site at Felindre is identified specifically for the potential to accommodate a Combined Heat and Power (CHP) Facility which could provide heat or power for adjacent proposed developments.
- 5.5.44 Draft Policy RP 9 requires development to incorporate, as appropriate, “adequate and effective provision for the storage, recycling and other sustainable management of waste, and allow for appropriate access arrangements for recycling and refuse collection vehicles and personnel.”

#### d) Summary of Compliance with Emerging Local Planning Policy

- 5.5.45 The Gas Connection can be regarded as sustainable development and necessary infrastructure provision in the countryside, in accordance with draft LDP Policies PS1, PS2 and CV 2 and is supported by Policy EU 1 and ER 1. With regard to policies for the countryside, heritage and environmental protection (Policies HC1, HC2, ER2, ER5, ER6, ER8, ER9, ER10 and RP 14), the Gas Connection:
- Has been integrated into that landscape through careful siting, layout, design and landscape mitigation commitments;
  - Includes detailed environmental and ecological mitigation measures;
  - Ensures that no heritage assets would be adversely affected;
  - Does not cause any adverse impacts on amenity and well-being; and
  - Would be decommissioned at the end of its design life and the landscape restored;
- 5.5.46 The Gas Connection will have several beneficial impacts including supporting construction employment in accordance with draft LDP Policies PS4 and IO2.
- 5.5.47 With regard to Policies RP 1, 2 and 3 and SI 1, the Gas Connection will ensure that there will be:
- No adverse effects on human health;
  - No adverse effects arising from noise or air pollution; and
  - There will be no impacts on water quality.
- 5.5.48 In terms of transport, impacts from the Gas Connection will be limited. A temporary closure of the PRoW LC35B will be required during construction, however this footpath will be re-instated during the operation of the connection. As such, it is considered that the Gas Connection complies with Policies T1 , T7 and T5 of the draft LDP.

- 5.5.49 With regard to draft LDP Policy RP12, it is likely that the Gas Connection would prevent extraction of coal, sand and gravel resources whilst it is constructed. The Gas Pipeline is likely to be left in situ. The coal, sand and gravels reserves are considered to be of minimal economic use. While there will be permanent sterilisation of the reserves from the Gas Connection, it is considered that a relatively small area of the reserves will be affected compared to the full extent available in the area. It is also understood that there are no current or imminent prospects of these resources being extracted. Policies RP 7 and 9 refer to waste and the Gas Connection incorporates an appropriate waste management strategy in accordance with the policies.
- 5.5.50 Due to the location of the Gas Connection, it would not impede the implementation of the strategic allocations at Policy SD 1(G), Policy SD A, Policy SD C, Policy SD E, residential land allocations or land safeguarded at Morriston Hospital.
- 5.5.51 The weight that can be attached to the emerging LDP is currently limited. In that respect, substantial weight should be afforded to the need for electricity generation and its associated development in line with national policy. However, overall, the Gas Connection accords with the emerging draft LDP and its aim to promote sustainable development.

## 5.6 Supplementary Planning Guidance

- 5.6.1 CCS has produced Supplementary Planning Guidance (SPG) to support the implementation of adopted UDP planning policies.
- 5.6.2 The Planning Obligations SPG, published by CCS in March 2010, is an SPG document of potential relevance to the Gas Connection. The Planning Obligations SPG identifies the types of obligations developers may be expected to contribute towards, the likely amounts of these obligations, and the procedures involved when entering into obligations.
- 5.6.3 The Protection of Trees on Development Sites SPG is also relevant and sets out steps to be considered to ensure that significant existing and proposed trees are kept healthy and become an asset to a new development. The Gas Connection incorporates suitable protection measures.

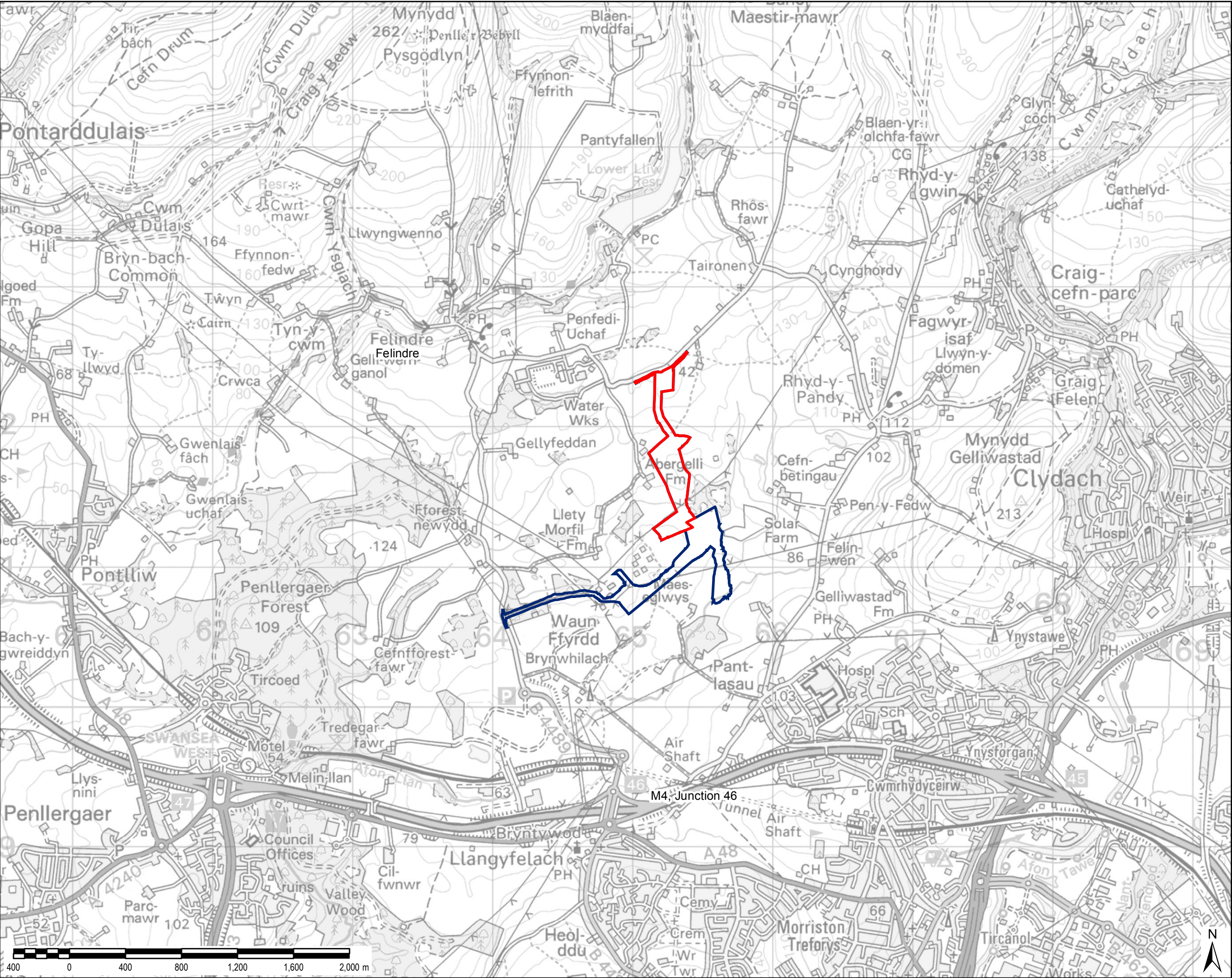
## 6. Conclusions

- 6.1.1 This PDAS has been prepared in support of an application for full planning permission for the Gas Connection. The Gas Connection will provide the ability to transport natural gas to the Project from the National Gas Transmission System. This PDAS has been prepared in accordance with national planning policy and guidance on the preparation of DAS documents.
- 6.1.2 The Gas Connection is considered to be an acceptable form of development for the following reasons:
- The site lies within an area of countryside in which a number of power related installations are already located and the site is suitable for power generation and its associated development;
  - The Gas Connection will facilitate the generation of low carbon electricity, which is a priority both in terms of UK and Welsh Government energy and planning policies;
  - The Gas Connection will contribute to employment generation and economic development in the area;
  - There are no existing highway safety issues in the immediate vicinity of the site and the existing public right of way will be retained during the operation of the scheme, while a temporary closure will be required during construction; and
  - Comprehensive mitigation measures are proposed to ensure that the Gas Connection is acceptable in environmental, landscape, amenity and well-being terms.
- 6.1.3 In conclusion, the Gas Connection complies with national planning and energy policies, the provisions of the development plan and emerging national and local planning policies. Accordingly, the planning application should be considered favourably by the local planning authority and planning permission granted for the Gas Connection.

## 7. References

- Ref. 1-1 Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the 'EIA Regulations')
- Ref. 2-1 City and County of Swansea. 2008. Unitary Development Plan. (Online) Available at: <https://www.swansea.gov.uk/article/5337/UDP-written-statement>
- Ref. 2-2 Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy, i.e. The Water Framework Directive.





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**Project Title:**

**ABERGELLI POWER PROJECT**

**Client:**



**LEGEND**

- Gas Connection Site
- Project Site Boundary

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**Drawing Title:**

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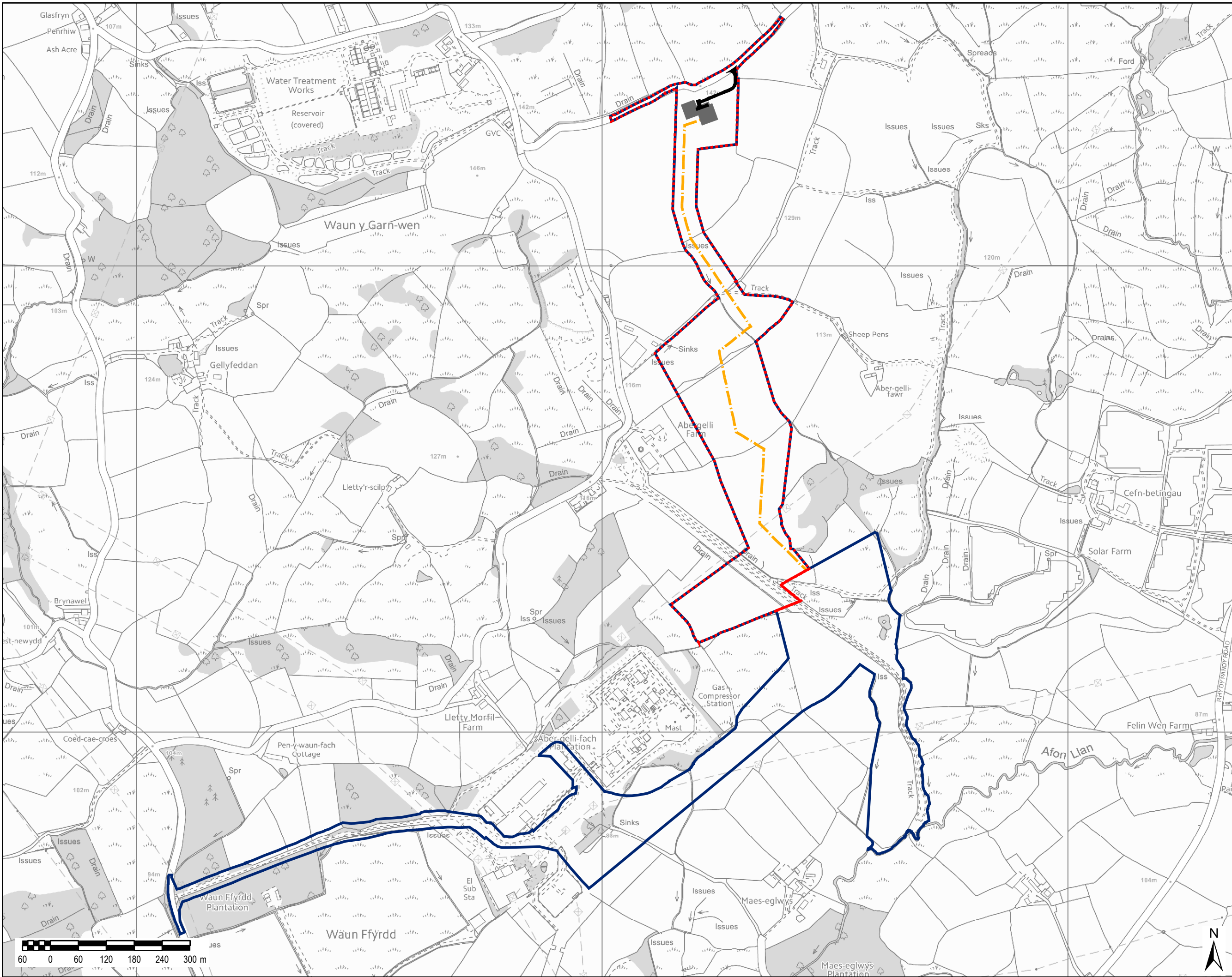
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FIGURE 1

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PROJECT**

**Client:**



**LEGEND**

- Gas Connection Site
- Project Site Boundary
- Access
- AGI
- Gas Pipeline

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**Drawing Title:**

**SITE LAYOUT PLAN**

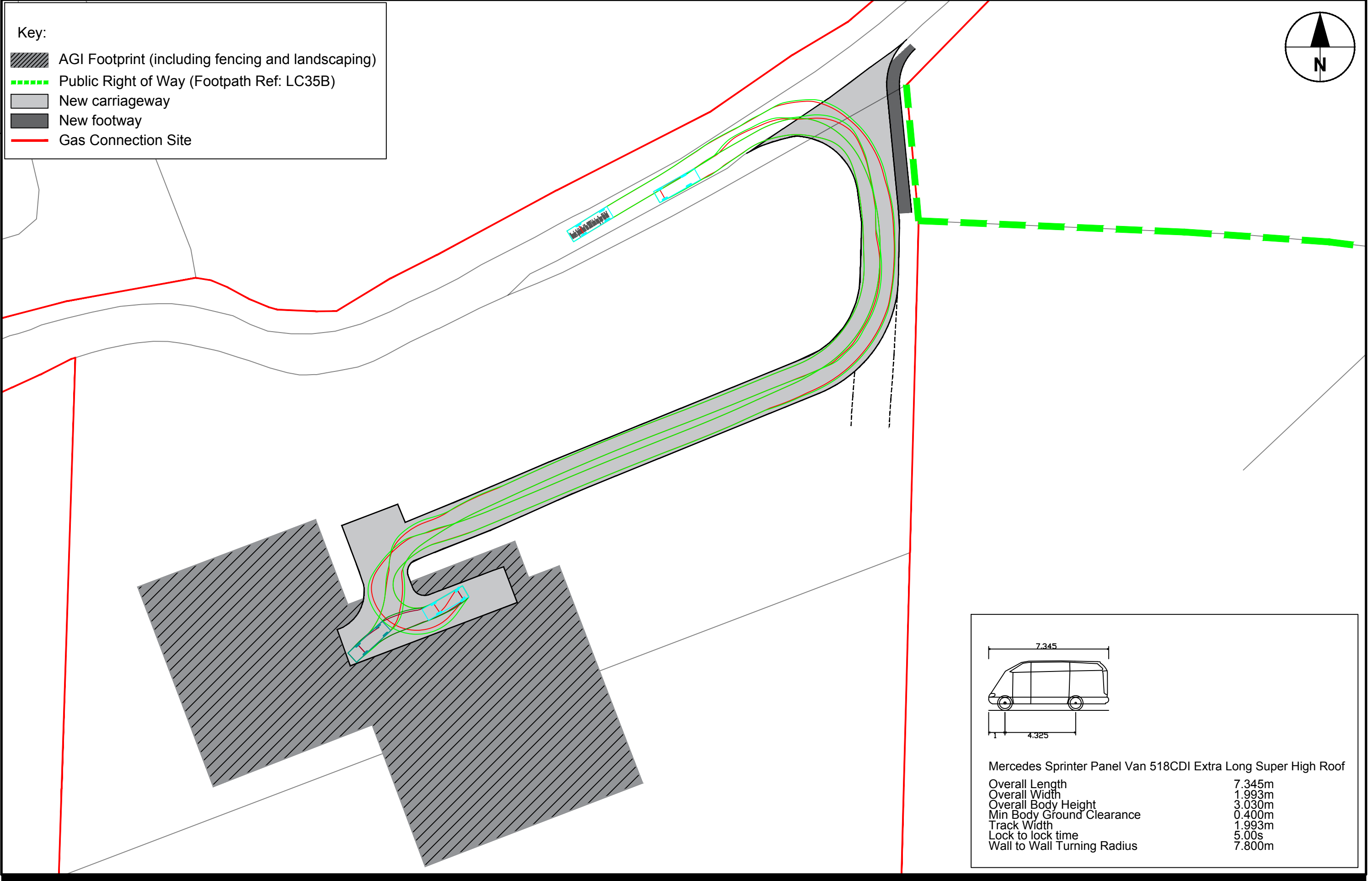
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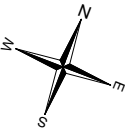
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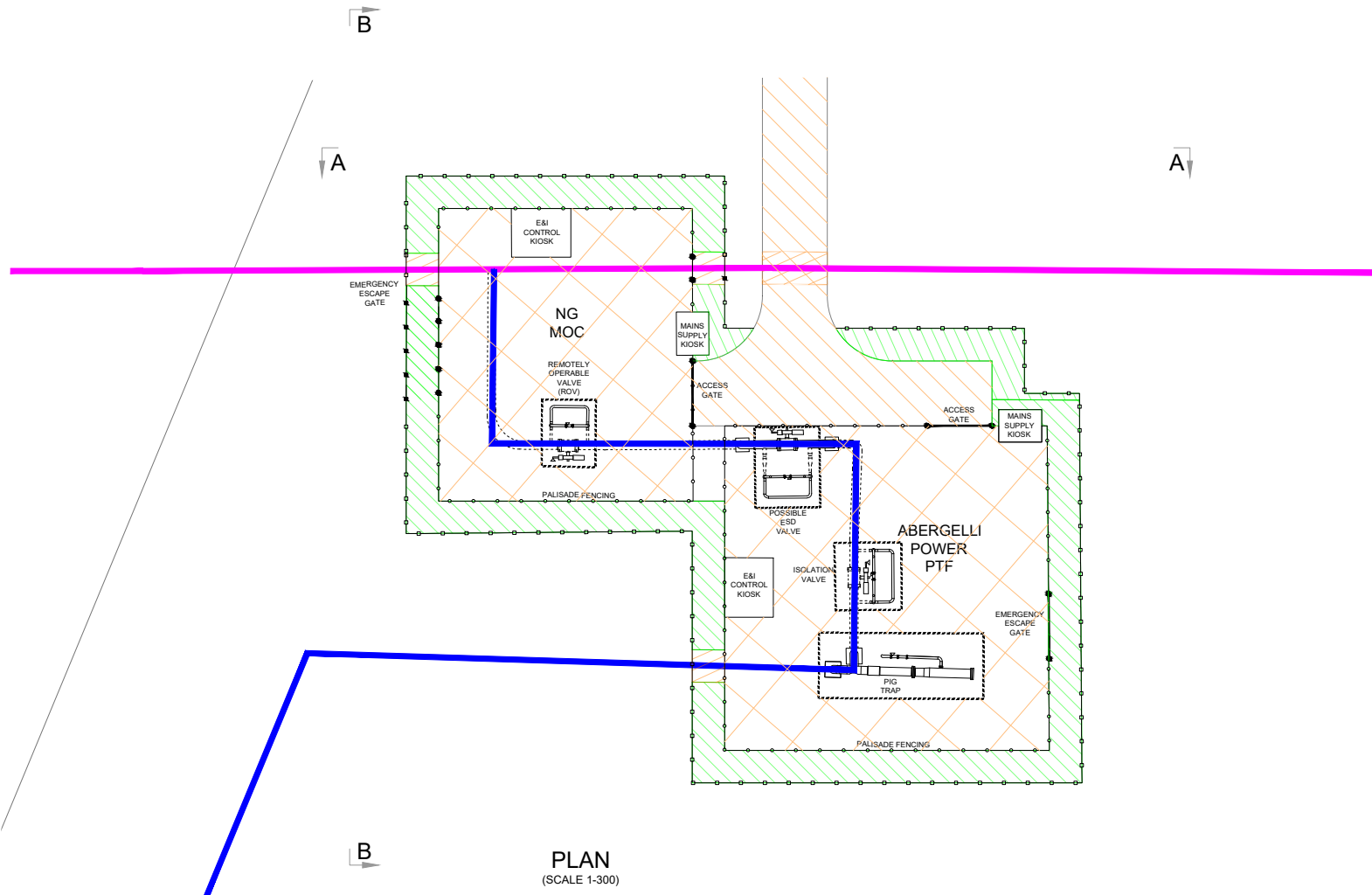
# Abergelli Power Project

Figure 3: AGI Access

DO NOT SCALE



- PALISADE GATE
- PALISADE FENCING
- STOCK PROOF FENCING
- STOCK PROOF GATE
- LANDSCAPING (INCLUDING SETBACK FROM FENCE)
- ACCESS ROAD (HARDSTANDING)
- GRAVEL
- EXISTING FEEDER 28 PIPELINE
- INDICATIVE PIPELINE ROUTE



P02	12 June 2018	AJB	UPDATED TO REFLECT CLIENT COMMENTS	SJS	
P01	06 June 2018	AJB	FIRST ISSUE	MT	
REV	DATE	BY	DESCRIPTION	CHK	APP

DRAWING STATUS: S2 - FOR INFORMATION



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CLIENT:

SITE/PROJECT:  
ABERGELLI POWER PROJECT

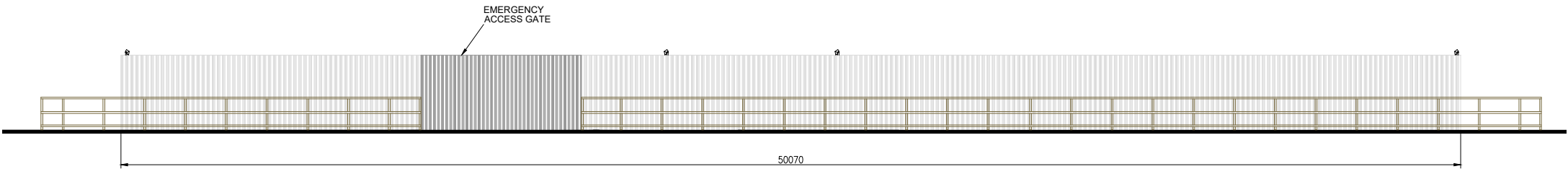
TITLE:  
FIGURE 4: AGI ELEVATION DRAWINGS (PART 1)

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PROJECT NO: 287257A	DESIGNED: AJB	DRAWN: AJB
DRAWING No: 287257A-APL-CS-14-0602		DATE: 05-06-18
REV: P02		

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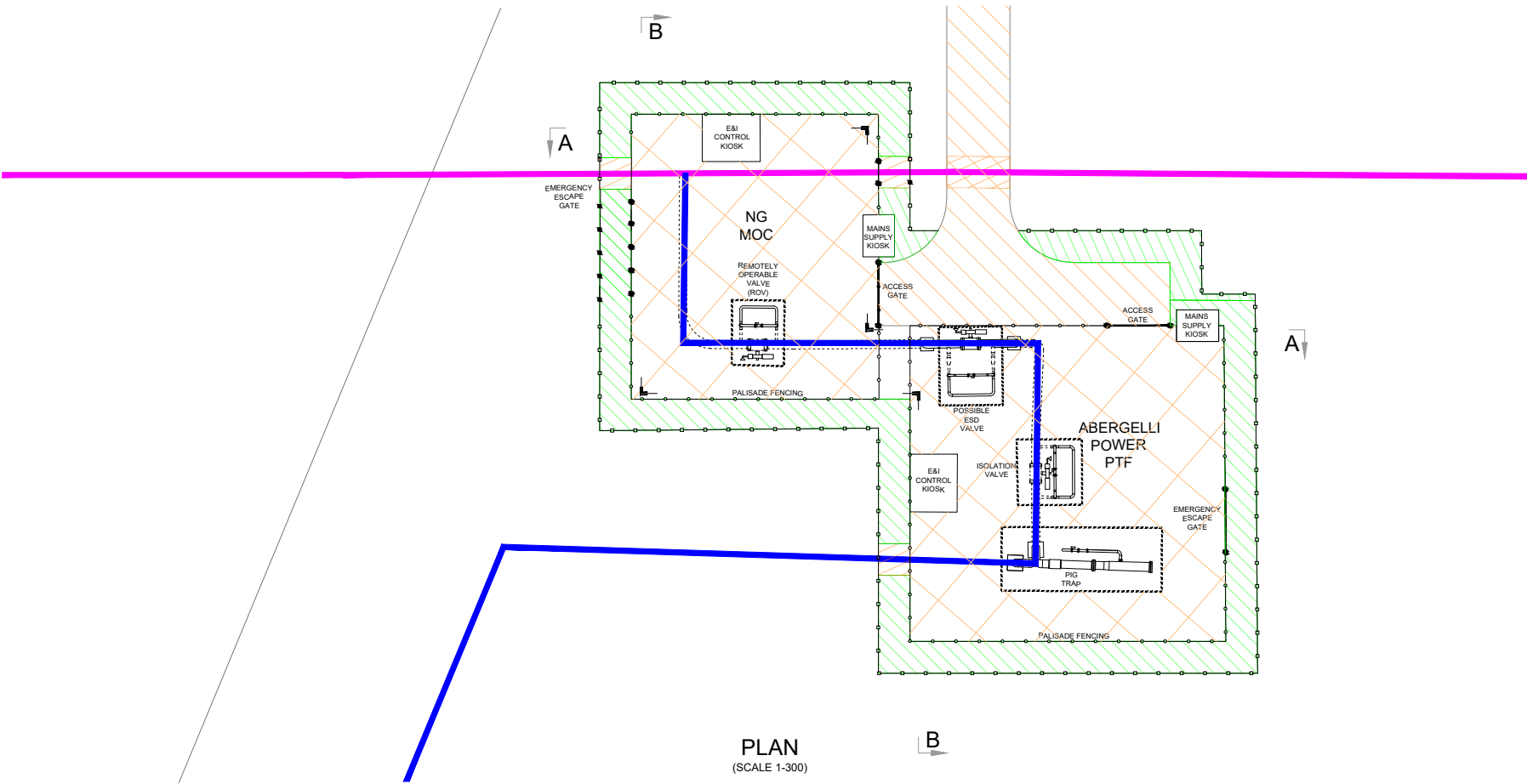
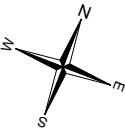
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(SCALE 1-100)



SECTION B - B  
(SCALE 1-100)

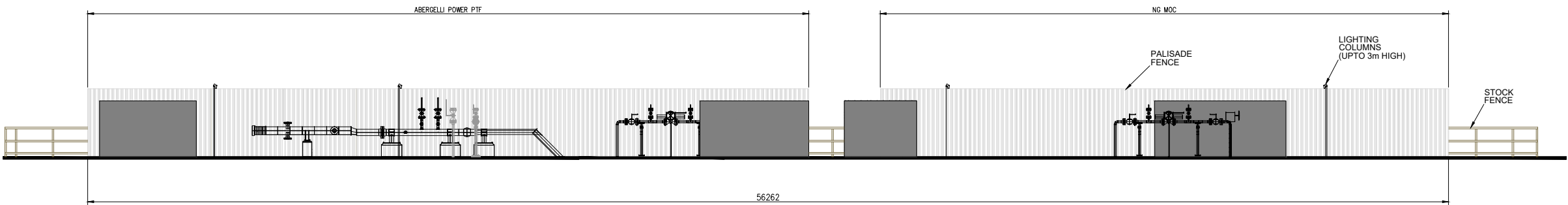


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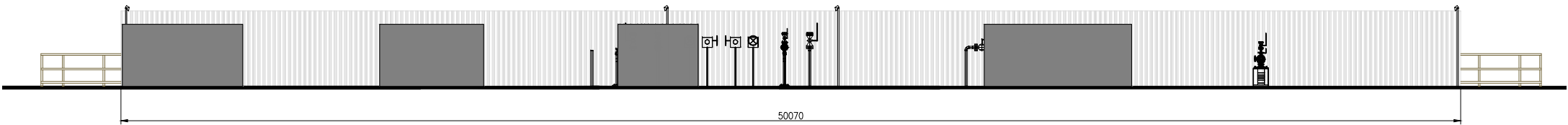


PLAN  
(SCALE 1:300)

- PALISADE GATE
- PALISADE FENCING
- STOCK PROOF FENCING
- STOCK PROOF GATE
- LANDSCAPING (INCLUDING SETBACK FROM FENCE)
- ACCESS ROAD (HARDSTANDING)
- GRAVEL
- EXISTING FEEDER 28 PIPELINE
- INDICATIVE PIPELINE ROUTE



SECTION A - A  
(SCALE 1:100)



SECTION B - B  
(SCALE 1:100)

P01	06 June 2018	AJB	FIRST ISSUE	MT	
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**Abergelli power**

SITE/PROJECT:

ABERGELLI POWER PROJECT

TITLE:

FIGURE 4: AGI ELEVATION DRAWINGS (SECTION DETAILS) PART 2

SCALE @ A1:	CHECKED:	APPROVED:
AS SHOWN	MT	
PROJECT NO:	DESIGNED:	DRAWN:
287257A	AJB	AJB
DRAWING No:	DATE:	REV:
287257A-APL-CS-14-0603	05-06-18	P01