

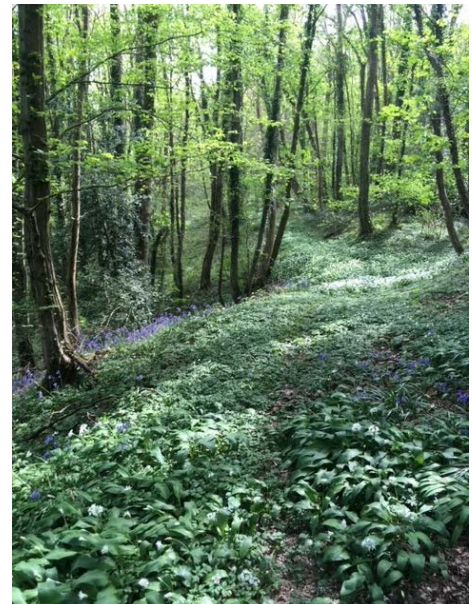


Community Objections to the Gas-fired “Peaking Plant” proposals of

Jones Brothers (Civil Engineering) Ltd

on the Seiont Quarry Site – Caernarfon

Ref: DNS CAS-02628-Y1D2Z7



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Objections to the gas-fired generation proposals of Jones Brothers Ltd – Seiont Quarry Site - Ref: DNS CAS-02628-Y1D2Z7

Introduction

The following objection document is owned collectively by the community of residents and land owners closely affected by the Jones Brothers' proposals and by others more widely who are strongly opposed to them for a broad range of reasons.

The document comprises three parts:

1. **Detailed Adverse Analyses of Elements in Jones Brothers' Proposals** - proposals that have an overall misleading effect in the elaborate emphasis applied to some less concerning aspects, such as "visual impact" (over-extensively covered) and the seemingly trivial/"passing" presentation of much more serious ones (disturbance and health and well-being risks to people and nature).
2. **Community Concerns and Individual Submissions** – collected and collated from pre-application consultation responses, subsequent questions raised and expressions of concern.
3. **A Higher-level and Overriding Objection**, which is concerned with the overall nature of the proposal and the responsibilities and legal obligations of public servants in Wales.

Planning decisions affect Life. They affect it in the broadest sense of the word: encompassing people and all of Nature, to which people also belong and on which they depend for their very existence. Planning decisions have social, environmental and cultural effects as well as economic ones. They affect all those aspects of life, in immediate, fundamental, far reaching and often irreversible ways; so the responsibility to make good planning decisions is of the utmost importance.

In Wales, we have some all-encompassing, "Life-supporting" legislation: ***The Well-being of Future Generations (Wales) Act 2015***, which was passed to ensure Sustainable Development and which is there to guide and direct good decision-making by the public bodies named in it, including Welsh Government itself and all of the 22 Local Authorities in Wales¹.

Public servants charged with decision-making in the case of Jones Brothers' submission, must do so in the interests of the current and future citizens in Wales and beyond, and in the interests of the natural environment upon which all depend for their well-being. They must make their decisions in support of those interests, as opposed to the interests of the private profit of a single organisation. To quote from very recent changes to Planning Policy Wales (PPW)²:

*"Planning authorities should develop a multi- functional, coherent and spatial framework of green infrastructure to improve the **overall well-being and health of communities and the environment.**"*

Even if decision makers were to accept in this case **what is very far from universally accepted** and allow that, despite zero carbon commitments, some minimal use of "natural" gas will be needed for so-called "transitional purposes", there are certainly many more suitable sites, in ownership other than Jones Brothers', for yet another peaking plant, if truly needed. The place proposed is in very close proximity to residential areas, a hospital and recreation facilities, as well as to natural ancient woodland and a river (both of very significant environmental importance). The principle known as '**Stepwise**³' should be applied here: i.e. where disturbance or harm to the natural environment or a threat to biodiversity is likely, **the existence of alternative sites gives grounds for avoidance (as opposed to 'mitigation') of that disturbance threat or harm.**

¹ <https://www.gov.wales/sites/default/files/publications/2021-10/well-being-future-generations-wales-act-2015-the-essentials-2021.pdf>

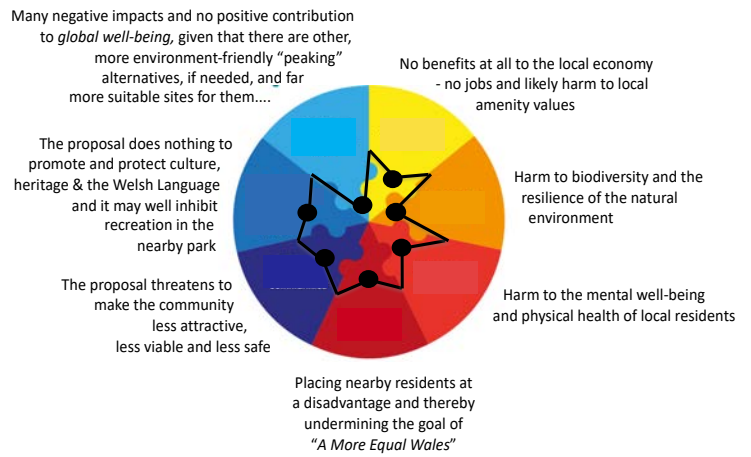
² See the letter and revised guidance from Julie James, Minister for Climate Change, published with immediate effect on the 18th October 2023: <https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

³ See below under 1.3.8 for an explanation of the Stepwise principle.

Because of its importance in the appraisal of Jones Brothers' unwelcome proposal, we shall use the **Well-being of Future Generations (Wales) Act 2015** as a framework for presenting in this document our multiple objections, an overview of which is illustrated below against the seven National Goals set by the Act:

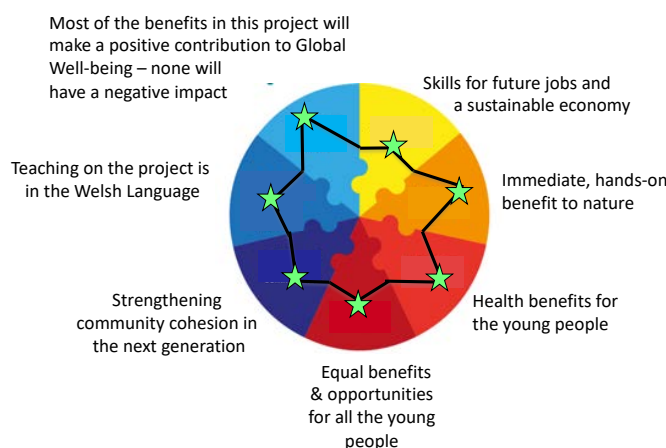
Goal	Description of the goal
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
A resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities.
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Issues regarding Jones Brothers' proposal that decision-makers, (bound by the Well-being legislation) should examine very closely.....



And to make these adverse aspects of the Jones Brothers' proposal clear, compare with a project that, for example, proposes an "outdoor classroom" for school children to do science field work, learn through conservation activity about protecting biodiversity and get fresh air and exercise; a project delivering varying strengths of positive impact on each of the seven National Goals.....

An example of a good project – contributing to the seven goals set in the Well-being of Future Generations (Wales) Act 2015.....



We can note the cynical and perfunctory, passing reference to this legislation⁴ in the Jones Bros. proposal material, reference that is positioned to cause any less than vigilant public servants to

⁴ The Applicant's *Design and Access Statement 4.3 is9 confused nonsense! It suggests the development would provide "housing in a highly sustainable location" (whatever that means – probably cut & paste from a previous, failed submission!) and attempts to imply that being "in line with PPW Ed 11", means the "strategy and objectives" (!) of the WFGA" are automatically "complied" with. We now have important revisions to PPW Ed 11.... see footnote 2 above.*

believe the legislation can be “complied with” if the plans are approved; but that kind of “tick box”, cosmetic compliance statement is a non-starter where this important legislation is concerned.....

All projects and developments undertaken in Wales are somewhere on the scale of positive to negative impact on **each** of the seven National Goals set in this Welsh legislation, as can be seen from the diagrams above. All public servants in the bodies named in the legislation must act in accordance with the Sustainable Development Principle set out in the Act, i.e.

“...in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.”

They must take account of

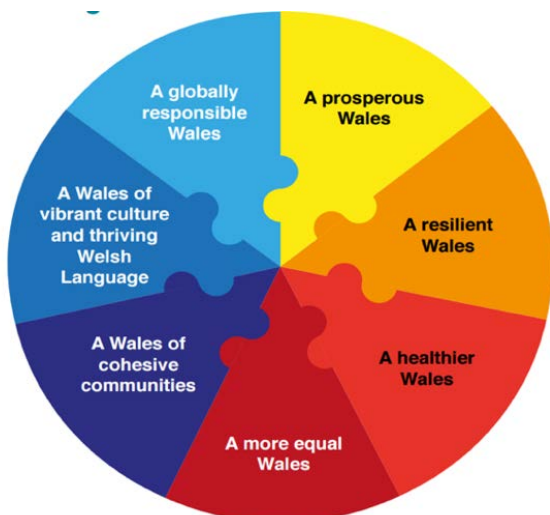
*“...the importance of balancing short term needs with the need to safeguard the ability to meet long-term needs, **especially where things done to meet short-term needs may have a detrimental long term effect**”*

We, who are submitting these objections, are firmly convinced that the development proposed by Jones Brothers will have **many detrimental effects, both in the short and the long term**. We expect our Governments, both and Local and National, to abide by the legislation that binds them and to take *“...all reasonable steps (in exercising [their] functions) to meet.....objectives”* that **support achievement of the seven National Goals and do not adversely affect them**.

We also expect them to fully apply the Five Ways of Working set down in the well-being legislation:

- *Giving due consideration to the **long term effects** of their decisions;*
- *Acting to **prevent problems from occurring** (as opposed to adopting a “pollute first manage later” policy that underlies heavy reliance on “mitigation”);*
- *Considering how well **integrated** the goals and objectives that drive their decisions and actions are with **Wales’ National Well-being Goals** (see below);*
- *Acting in **collaboration** with any other person (or different parts of their own organisation (e.g. public protection and biodiversity colleagues...!)*
- ***Involving people** and ensuring that those people reflect the diversity of the area that they serve.*

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



1. Detailed adverse analyses of elements in Jones Brothers' Proposals

In this section, we are keen to ensure that decision makers and their officials are not blinded by the Applicants' presentation of detailed scientific analyses, selected and paid for by Jones Brothers, or by the beguiling confidence with which they present the consultants' mitigation suggestions. We have much to say, in this section and in Section 3, about the Applicants' heavy reliance on "mitigation" in support of their submission.

Since compiling the contents of this Objection Document, our Community became aware of a **second application** (this time to the LPA only) by the Jones Brothers owned Seiont Ltd :

"New vehicular access and alterations to Ffordd Waunfawr, internal access and temporary use of land for storage, retention of concrete batching plant and recycling and export of finished materials/products – Seiont Quarry, Caernarfon" - [REF: XXXXX - Awaiting validation by Gwynedd Council]

This second installation, of a concrete processing plant, is planned to sit in very close proximity to the proposed gas-fired generation plant covered in this document. The pre-consultation papers for the concrete processing proposals acknowledge the same categories of adverse impacts as those covered in the papers relating to the Gas-fired plant; but with the very unwelcome addition of "fugitive dust" resulting from the crushing of concrete.

As with the gas-fired plant proposals, "mitigation" is the mainstay defence put forward by the developers in support of their concrete processing proposals. Our Community's response to that is the same as is set out in Section 3 of this document below; the second objection document (*Appendix 1 to this this one*), concerning the concrete processing will go to Cyngor Gwynedd Planning Committee when they consult on that application. It emphasises the **increase in the levels of harmful impact resulting from the two contiguous operations** being conducted on the same site and from the addition of yet another very serious pollutant in the form of "fugitive dust".

THE OBJECTION DOCUMENT COVERING THE SECOND PROPOSAL IS APPENDED TO THIS DOCUMENT - IT IS ESSENTIAL THAT THE TWO ARE READ TOGETHER.

1.1. Impact on People: present members of the community and future generations

1.1.1. **Air pollution:** NO_x and Volatile Organic Compounds (VOCs) such as Benzene and formaldehyde.

Nitrogen Oxides (NO_x) is a group of gases formed during the combustion of fossil fuels including gas. The health impacts of NO_x include eye, nose, and throat irritation, respiratory problems, heart conditions, and lung damage. NO_x also combines with VOCs in the presence of sunlight to form ground-level ozone. Ozone can damage the tissues of the respiratory tract, causing inflammation and irritation, chest tightness and asthma symptoms. VOCs such as Benzene and Formaldehyde also result from industrial combustion processes and both are known carcinogens. Unsurprisingly, there appear to be no direct references to the human health effects of these pollutants in the documents posted by Jones Brothers. Their Air Quality Assessment is a technical document, involving modelling of the peaking plant engine emissions in general. (*See also sections 2.1.1 to 2.1.7, concerning air pollution, in Appendix 1*). In the following paragraphs we have set out

major concerns over the modelling and the assumptions made in the commissioned Assessment:

i) No consideration has been given to the cleaning up of emissions containing NOx.

When gas burns it creates emissions, such as NOx, which are extremely toxic to people and the environment. There is no indication in this application of arrangements to deal with the poisonous NOx to make the emissions safe, rather there is an intention to use 'flues' to disperse them. We realise that there would be additional costs for the company to treat emissions such as NOx but, given that there is great concern about the health of residents, climate change and the protection of our environment, this issue should be at the forefront of their plans. If it is not possible to clean up the emissions then the application should be considered unsuitable.

ii) An unsuitable Site

The site is in the Seiont River valley, with steep slopes on both sides of the river. On these slopes there is woodland hosting a flourishing and diverse range of wildlife. Above both sides of the river, there are housing estates. There is also a hospital housing sick and vulnerable people, a public park for the town and a rugby / football field which provides outdoor activities in a hitherto safe environment for children and adults.

We understand that, other than through the broad pre-consultation notices, Jones Brothers and their consultants have had no specific engagement with the managers of **Ysbyty Eryri, the hospital in close proximity to the proposed development.**



The entrance to this hospital and the wings on either side of it are just above, and facing directly towards the site of the proposed development. We would expect decision-makers handling this application (and the equally concerning concrete crushing application for the same site) to require that thorough testing and modelling be carried out around the hospital, taking full account of the topographical effects of the quarry site on pollutant / particulate dispersal. Modelling using National Database data will not be adequate, particularly given the extremely sensitive nature of human receptors associated with the hospital.

The application refers to 'flues' to disperse the NOx **but, because the site is in a depression, it is not reasonably possible for the 'flues' to be high enough to disperse it effectively.** It is likely that the emissions will remain in the valley, rising to pollute the woodlands on the slopes and poison the populated areas on the perimeter, including the hospital.

iii) Emissions from the engines

It is intended to fire up the station at the busiest times to support the grid, namely during the autumn, winter and most of the spring. Of course, at that time, there are no leaves on the trees to offer the residents any protection from NOx emissions. In addition, the 10

engines are expected to fire during the busy periods of the day which are the morning, tea time and evening. Therefore, each engine will fire approximately 3 times a day; and this is when most of the NOx is produced. The NOx emission figures for the application have been averaged over a whole year rather than 6 months of the year which is more realistic. Of course, doing this would not be supportive of their application.

iv) Adverse effects on health

The effect of gas burning emissions is detrimental to health and this is a fact that cannot be contested. The smallest particulate pollution in the emissions easily penetrates into sensitive and deep parts of the lungs causing respiratory diseases such as emphysema, bronchitis and asthma. NOx can also worsen pre-existing heart disease, leading to premature death. This fact is of great concern to us in terms of the future of our health and the health of the children in the area. It will not be safe for anyone to open their home / hospital windows or be out in the open while the 10 engines are in use. Therefore the proposed development would adversely affect our basic freedoms.

v) Significant air pollution is already resulting from bypass road traffic

We are already surrounded by roads including the new Bontnewydd/Caernarfon bypass. Although the bypass is welcome and convenient to road users, the level of air pollution has risen around us due to a significant increase in heavy diesel lorry traffic. Gwynedd Council and Welsh Government should urgently review the current impact of the new road on the health of the population before giving any consideration to new work that will further contribute to the problem.

Cadnant Planning acknowledges that the receptors used may not be in the appropriate places to include the true impact of the new bypass and that some data is not recent due to the impact of COVID. Therefore, there is not much confidence in the data that this report is based on.

The following concerns need to be examined and addressed:

The quarry location is in the Seiont river valley, which is in a deep ravine with steep wooded ridges on each side. We suspect that the emissions will not disperse as suggested in the Developers' modelling and we know from experience that during the fireworks display on Nov 5 the emissions from the other ridge actually reach Penybryn Road. Presumably they also reach the houses /hospital/ football/rugby ground and park on the other side of the ridge. It is reasonable to believe that 10 generators in an nearby ravine, where the NOx emissions cannot be dispersed successfully by 10 low flues, will have an effect on the health of all in the area. For our woodlands and Eryri Public Park these emissions will cause acid rain formation which is known to cause ecological harm to plants, trees and aquatic life.

The application has used modelling which is based on information that is not all current: the new Bontnewydd /Caernarfon bypass road was not included in the 2019 background maps and therefore any affect this road has on the proposed development cannot have been taken into account. This is a clear deficiency in the modelling which perhaps should be repeated using up to date and accurate information and in accordance with the Environment (Air Quality and Soundscapes) (Wales) Bill 2023.

In particular:

- i) There seem to be inconsistencies in NOx levels emitted from the individual gas firing machines and what is allowable:**

Comments on Appendix I – Air Quality Assessment Report

ITP Energised (ITPE) Report: Air Quality Impact Assessment Report (Rev. V2 dated 15/05/23).

Item 1.0.3 of ITPE Report has selected an EDINA Type TCG 2020 V20 as the base generating machine for the emission modelling in order to comply with MCPD requirements.

Appendix 2 of the ITPE Report – Manufacturer Emissions Data specify that the actual NOx concentration is **68.1 mg/nm³**.

An internet search for Technical Data for a Type TCG 2020 V20 50 Hz gas fired machine revealed a MWM Technical Data sheet where the NOx levels are stated as **500 mg/nm³**.

Item 1.0.3 of ITPE Report states that the allowable maximum emission concentration for NOx used in the report is **250mg/Nm³** (5% oxygen).

Item 2.1.4 of ITPE Report indicates that allowable NOx level is **95 mg/Nm³** (15%O₂, 273deg, 101.3kPa).

Jones Bros Ltd. need to clarify what are the allowable NOx limits for the plant and whether the proposed gas fired machine vendors are aware of the NOx limits and capable of meeting those limits.

It is noted that NOx levels will be higher during start-ups, shut downs and peak operation therefore NOx readings are not valid during these times. Given that the plant will only be in operation for 36% of the year it is therefore envisaged that there will be high levels of start-ups and shutdowns during the operation of the plant. **Jones Brothers need to clarify the NOx levels of the unit/plant during start-ups, shutdowns and peak period operations and that these levels will be monitored in addition to monitoring the plant/unit on base load operation.**

- ii) **Jones Brothers need to explain why they do not refer to any commitment to reduce the NOx pollution by any other abatement technologies available today.**
- iii) **The Welsh Government has recently passed into law its Environment (Air Quality and Soundscapes) (Wales) Act 2024** which enacts measures that contribute to improvements in the quality of the air environment in Wales and reduce the impacts of air pollution on human health, biodiversity and the natural environment. **What impact does this Act have on the modelling data and measurement used in this assessment?**

1.1.2. **Impact on recreation facilities**

It is a well-evidenced fact that outdoor exercise exacerbates the effects of air pollution due to increased respiration during recreational activities⁵. Therefore the air pollution concerns, raised above in 1.1.1, are a particularly serious issue for the three recreation areas in close proximity to the proposed site (the park and the rugby and football grounds), given the greater health risks posed for the children and adults who regularly use those facilities.

There is also a further problem in connection with that effect, as the mere presence of the ten gas-fired units and their flues is likely to deter people who have hitherto made regular use of the recreation facilities from using them, regardless of the particular daily or annual

⁵ Daigle, C.C.; Chalupa, D.C.; Gibb, F.R.; Morrow, P.E.; Oberdörster, G.; Utell, M.J.; Frampton, M.W. Ultrafine Particle Deposition in Humans During Rest and Exercise. *Inhal. Toxicol.* 2003, 15, 539–552.

times when emission levels are higher. Such erosion of the community's confidence in their public amenities, regardless of the actual levels of pollution (which in any case will be unacceptably high at the times when the plant is operating), would be a wholly unjust and unacceptable consequence of approving the Jones Brothers' application.

1.1.3. **Sound levels and frequency (see also sections 2.1.8 to 2.1.11 in Appendix 1)**

Anthropogenic noise is recognised as a major pollutant that has considerable implications for human health, the European Environmental Agency has reported that noise ranks second only to air pollution as the environmental exposure most harmful to public health. Researchers and clinicians have shown that noise pollution can cause hypersensitivity to sound and exacerbate cardiovascular disease; type 2 diabetes; sleep disturbances; stress; mental health and cognition problems, including memory impairment and attention deficits; childhood learning delays; and low birth weight. Scientists are also investigating other possible links, including to dementia.

The damaging effects of sound are not only about high levels of noise (which is the focus of Jones Brothers commissioned assessment); **the duration, spectral and temporal characteristics of chronic noise exposure are now believed to be as important as the amplitude when it comes to the long-term effects.** These aspects also affect the behaviour, physiology and fitness of wildlife – see 1.3.4 below.

First, attention must be paid to the duration of the noise emitted from the gas-fired engines: the units are available to support the grid at times of high demand and/or times of low output from renewables, wind in particular. Similar installations operate in excess of 2000 hrs per annum, at all times of day and night; that is, on average, 6 hrs per day but, on occasions, many more. Operation of the units for substantially less time results in reduced income for the owners making the venture uneconomic.

The above point is laboured here to dispel the notion that the proposed units at the Quarry site will only be used between 17:00 to 19:00, when, according to Jones Brothers' assessment, traffic noise will mask the unit operation noise. The units will most probably also operate at times when the only background noise will be early morning birdsong or, quieter still, in the dead of night.

The noise emission from just 1 of the 10 gas motors is quoted at 75dBA and this figure appears to be used to assess the specific sound level at the noise monitoring positions; if this is so then the specific sound levels when all 10 units are operating **will, in fact, be some 9db higher, raising the impact from "low" to "substantial". Clarification on this point must be required.**

Each individual gas motor is housed in a custom container with a **substantial set of cooling fans** specific to that motor. The fans generate considerable noise and are often floor mounted in a separate unit to constrain the noise footprint; however in the Jones Brothers' proposals, the fans appear to be mounted aloft on the roof of the container, increasing the noise levels at range. It is vital to determine if fan noise has been included in the assessment and if so at what levels. **Clarification on that point must also be required.**

The motors are large, some 18,000kg, and **the cooling fans move large quantities of air.** All the 10 units operate at or near similar revolutions, motors and fans. There is therefore a possibility of **producing powerful low frequency droning**, with a large area footprint, with units heterodyning. **Checks should be made as to whether this has been observed in other operational installations elsewhere.**

1.1.4. **Public Safety**

The section headed “Community Safety” in the Applicant’s “Design and Access Statement” is extremely worrying in its caveated tone.... Expressions such as “...*not expected to pose any significant risks to the general public*” and “...*unlikely to have significant impact to nearby residential properties...*”, (designed no doubt to protect them in the event of potential future litigation) give local residents and landowners no comfort whatsoever!

The section headed “Risk of Disaster” in Jones Brothers’ Supporting Statement is notably all about potential risks to the site and the operating plant itself, as opposed to the surrounding residential area and its inhabitants.

We are concerned that potential risk levels associated with the STOR equipment itself and the gas supply and consumption arrangements have not been adequately covered in Jones Brothers’ application material.

1.1.5. **Access and Traffic** (See also Appendix 1 - sections 2.1.12 and 2.3.4)

Under 3.11 of the Cadnant Planning Design and Access statement, it is stated of Seiont Mill Road, the only access for the residences located there, that “...*it is considered suitable to deal with construction associated vehicles such as articulated HGV etc.*” The actual scale of the likely disturbance and potential damage is revealed elsewhere in the documentation where the use of a substantially sized crane is referred to (see 2.3.1 of the pre-application supporting statement).

1.2. **Impact on the Economy**

There have been no convincing arguments whatsoever to suggest that even the slightest benefit to the local economy would result from the proposed development, not in terms of local jobs or any benefit to local businesses. Furthermore, damage to the amenity value associated with neighbouring properties and woodland is highly likely to result from the imposition of the planned generating plant, and the area will become a less attractive place to visitors and potential future investors.

1.3. **Impact on the Environment**

1.3.1. **Climate Change Effects:**

We are in the midst of a global climate emergency. Fossil fuels – coal, oil and gas – are by far the largest contributor to global climate change, accounting for over 75 per cent of global greenhouse gas emissions and nearly 90 percent of all carbon dioxide emissions.⁶

Natural gas accounts for a fifth of the world’s total carbon emissions.⁷ While it is often talked about as a ‘bridge fuel’ to renewable energy, this is a false narrative.⁸ The IPCC warns that fossil fuel emissions must be halved by 2030 if global warming is to be limited to 1.5°C above pre-industrial levels⁹ - the level of heating which, if exceeded, would lead to increasingly catastrophic and potentially irreversible impacts on our planet. To achieve this,

⁶ <https://www.un.org/en/climatechange/science/causes-effects-climate-change>

⁷ <https://www.iea.org/data-and-statistics/data-tools/greenhouse-gas-emissions-from-energy-data-explorer>

⁸ See for example, https://www.panda.org/wwf_news/?8284466/natural-gas-climate-nature-disaster ; <https://www.iisd.org/articles/gas-bridge-fuel> ; <https://www.theguardian.com/environment/2021/nov/04/gas-new-coal-fossil-fuels-climate-disaster>

⁹ https://www.ipcc.ch/report/ar6/syr/downloads/press/IPCC_AR6_SYR_PressRelease_en.pdf

we need to end our reliance on fossil fuels and invest in alternative sources of energy that are clean, accessible, affordable, sustainable, and reliable.¹⁰

The Welsh Government has declared a climate emergency, and committed to arrive at net zero by 2050.¹¹ It has a target for Wales to meet 100% of its annual electricity consumption from renewable electricity by 2035. In December 2023, Julie James MS, Minister for Climate Change stated:

“We must strive to deliver the low carbon economy that will sustain future generations, not retreat from the task and burden future generations. This includes the imperative of reducing the global dependence on fossil fuels.”¹²

In addition, it has been acknowledged that there is an urgent need to phase out all unabated gas. For example, the UK Climate Change Committee’s *“Sixth Carbon Budget – The UK’s path to Net Zero”* noted that, under their *Balanced Net Zero Pathway*,

“...no new unabated gas plants should be built after 2030, and the burning of unabated natural gas for electricity generation should be phased out entirely by 2035. Any gas plant built before 2030 should be made ready for a switch to CCS or hydrogen (i.e. this should be both technically feasible and the plant should be located in a part of the country that will be served by the necessary infrastructure”¹³.

However, in their pre-submission documents and *Supporting Statement* for the application, the developers make no mention of employment of carbon capture and storage at the site although the life span of a well-maintained gas-fired power plant is at least 25 years and typically 30 to 40 years or more.

A further serious concern is that the ever-increasing number of applications for gas peaking plants is directly at odds with the deployment of other forms of flexible electricity generation and storage. A Wood Mackenzie [report](#) has forecast that global energy storage capacity could grow at a compound annual growth rate of 31% up to 2030, representing a massive increase¹⁴. Advances in battery technology are now occurring at a rate that could soon render gas peaking plants obsolete. Already in 2020, UK projects in operation, under construction, with planning approval or under development had a total capacity of 17,104 MW¹⁵. Furthermore, Reuters recently reported that, *“Giant batteries that ensure stable power supply by offsetting intermittent renewable supplies are becoming cheap enough to make developers abandon scores of projects for gas-fired generation world-wide”¹⁶.*

In their *Supporting Statement*, the Applicants suggest that:

“Locally, it is unlikely that renewable that renewable sources in North Wales ever exceed both local demand and the capacity of the grid to transfer any ‘surplus’ power to areas of demand, and so storing electricity in a battery storage system would always require additional electricity generation by fossil fuel sources. Battery storage is therefore not a low or zero carbon source of electricity within the current pattern of supply in North Wales.”

¹⁰ <https://www.un.org/en/climatechange/raising-ambition/renewable-energy>

¹¹ <https://www.gov.wales/net-zero-wales>

¹² <https://www.gov.wales/written-statement-climate-change-0>

¹³ <https://www.theccc.org.uk/publication/sixth-carbon-budget/#downloads>

¹⁴ <https://www.woodmac.com/press-releases/global-energy-storage-capacity-to-grow-at-cagr-of-31-to-2030/#:~:text=Wood%20Mackenzie's%20latest%20report%20shows,of%20cumulative%20capacity%20by%202030>

¹⁵ <https://www.renewableuk.com/news/517015/Governments-announcement-on-battery-storage-will-boost-investment-in-new-technology-.htm>

¹⁶ <https://www.reuters.com/business/energy/giant-batteries-drain-economics-gas-power-plants-2023-11-21/>

In fact, Table 7 of the Anglesey and Gwynedd Joint Local Development Plan 2011-2026 (JLDP) illustrates the scope for further development of renewables in the region (even when ignoring the high figure for biomass predicated upon successful development of the biomass plant at Holyhead). The table shows the additional potential for renewable energy in the area to be 104.6 GWh for onshore wind (almost 100% more than the existing energy generated from this source at the time of writing the JLDP), 289.2 GWh for solar (over 600% more than the existing energy generated from this source), 80.6 GWh for anaerobic digestion (vs 0 GWh existing), 36.4 GWh from energy from waste (vs 0 GWh existing), and 481.8 from tidal (vs 0 GWh existing). **The Supporting Statement is thus incorrect in concluding that battery storage is not, or cannot be, a low or zero carbon source of electricity in North Wales.** Moreover, the JLDP was written at a time of severe kickback against wind and solar projects, and it seems inevitable, against the background of a changed scientific, political and policy landscape, that the new LDPs under development will have far more ambitious delivery targets.

Here the following considerations must be factored in as part of the examination of the Applicant's proposals:

- a) **the intention to increase pumped hydroelectric energy storage**, as exemplified by the approved 99.8-MW Glyn Rhonwy Pumped Hydro project (Snowdonia Pumped Hydro was recently given a two-year extension, to 29 March 2026, to commence work, and it has been reported that much of the required permitting work has now been completed);
- b) **The 58-MW Lightsource bp energy battery storage project at Pentir, Bangor¹⁷**, specifically designed to facilitate the integration of renewable energy into the grid, which belies **Jones Brothers' assertions about battery flexibility services in the area** :
"Lightsource bp is working on a proposal for an energy storage project at Pentir, Bangor, Gwynedd. We will fund and operate a 57MW/228MWh (4-hour duration) energy storage project connected into the local electricity network. The project will facilitate the integration of renewable energy into the grid, helping to support low-cost electricity and the enhanced reliability of the electricity grid"
- c) the anticipated future **role of interconnectors and 'green' hydrogen** and
- d) the **support for deployment of Rolls-Royce small modular reactors**, which according to Rolls-Royce could entirely remove the need for any new gas peaking capacity¹⁸.

In the light of all these developments, it would be inappropriate to approve an application for an unabated gas plant with a potentially long life span that is clearly at odds with Welsh Government's stated policy objectives.

In this context, observations made in 2023 by the Energy Networks Association (ENA) and the Association for Decentralised Energy (ADE) are also highly relevant.¹⁹ The ENA data showed that in the 12 months to August 2023 4.6 GW of flexibility was tendered, of which 2.4 GW was contracted, while the UK's average daily energy demand during this period was 29.4 GW. Of the flexibility capacity contracted during the year, just 19% was accounted for by fossil fuels – mainly gas-fired peaking plant capacity. This both demonstrates the rapid increase in non-fossil fuel flexibility, including battery storage, and suggests that continued progress in this regard will quite rapidly approach a high percentage of average daily demand. The ENA also point out that demand reduction trials have proved popular, indicating an expanding future role for this approach in improving flexibility/short-term operating reserve (STOR). This role was already recognised by National Grid ESO when it

¹⁷ <https://www.lightsourcebp.com/uk/projects/pentir-energy-storage-project>

¹⁸ https://www.rolls-royce-smr.com/assets/aurora_analysis_july-23.pdf

¹⁹ <https://www.edie.net/records-broken-for-uks-energy-flexibility-markets/>

introduced its Demand Flexibility Service (DFS) in 2022, and the DFS is now to be made available all-year round owing to its success. ADE policy manager for flexibility, Sarah Honan, has concluded that, “An exponential increase in low carbon flexibility is the only path for reaching net-zero in a cost-effective way.” It is indeed widely recognised that distribution network/system operators will, in future, further exploit information and communications technology to this end, making use of a wide range of smarter network options that include dynamic asset rating, automated load transfer, voltage reduction, active network management and inter-tripping.

A further relevant observation is that the Electricity Storage Network – the UK industry group dedicated to electricity storage – recently pointed out that National Grid ESO is failing to make the best use of available energy storage in the balancing mechanism and is instead opting for more expensive higher carbon-emitting assets, i.e. gas peaking, when seeking to balance supply and demand. It is expected that National Grid, either of its own accord or due to OFGEM pressure, will act to improve its IT systems and control room processes to rectify this situation²⁰, which, again, will impact on the supposed need for new gas peaking plants.

All of these considerations undermine the case for the proposed gas peaking plant, which will have a significant impact in increasing carbon emissions and will do so at a very high price to consumers.²¹

It is therefore our contention that the increasing use of battery storage and potentially other zero- or low-carbon energy sources, combined with improvements at the National Grid and in demand response/reduction, will negate the need for further gas peaking plants and that the developers have not proved their case that the application is justified by reference to Section 5.7.2 of Planning Policy Wales (PPW, edition 12), which states that:

“The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement. Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales.”

This section of PPW **does not specifically relate to gas peaking plants** and, as mentioned above, other flexibility services are available and rapidly expanding. In fact, approval of proposals for gas peaking plants across Wales could significantly increase the total electricity generation within Wales that is accounted for by gas-fired power stations and limit the use of alternative, more sustainable means of grid balancing. We note in this context the comment in Energy Generation in Wales 2021²² that, “An increase in electricity generation from gas in 2021 compared with 2020 has resulted in the estimated percentage of total electricity generation delivered by renewables decreasing from 33% to 28%”. This trend is worrying and clearly at odds with the Welsh Government target for Wales to meet 100% of its annual electricity consumption from renewable electricity by 2035. Compliance with that target is essential; proposals for further gas peaking plants in Wales therefore appear inappropriate. Moreover, bearing in mind the alternative approaches discussed above, these gas plants are at odds with the Energy Hierarchy recognized in PPW²³ Sect. 5.7.13 and Figure 10. They also contravene Welsh Government’s policy objective of avoiding the continued extraction and consumption of fossil fuels, as stated in PPW 5.10.11.

²⁰ <https://tamarindo.global/articles/uk-national-grid-neglecting-storage-in-balancing-mechanism/>

²¹ <https://www.theguardian.com/business/2023/jan/29/gas-fired-plants-uk-lights-on-cost-profits-energy-crisis>

²² <https://www.gov.wales/sites/default/files/publications/2022-12/energy-generation-in-wales-2021.pdf>

²³ https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf

Careful note should be taken of Cyngor Gwynedd's declaration of a climate emergency and its adoption of a Climate and Nature Emergency Plan with the ambition of being a net zero carbon Council and ecologically positive by 2030.²⁴

Taking all of this evidence into account, the conclusion must be that the building of a gas-fired plant will not be in line with the declarations and targets of Welsh Government and Cyngor Gwynedd in response to the climate crisis.

Gas-fuelled peaking plant is definitively not, as the Applicant claims in their *Supporting Statement* section 4.1.2, the “lowest carbon method” to balancing electricity demand and supply. Almost any CHP plant would, for example, be a lower carbon method of contributing to grid security. And, as pointed out above, very many other lower carbon options are available, including those set out by Western Power Distribution:

- Automated load transfer
- Dynamic asset rating
- Voltage reduction
- Active net management
- Intertrip connections
- Timed/profiled connections
- Export/import limited
- DSO reserve products
- DSO outage management – demand turn up
- Coordination and sharing of DSR with GBSO
- Development of constraint visibility platforms

alongside other forms of storage such as batteries and the others mentioned above under a) to d).

PPW 5.7.7 notes that the planning system should... ***“minimise the carbon impact of other energy generation”***, including, presumably, through ensuring that fossil fuelled peaking plants – where they meet all other tests – are CHP, which would enable use of the **>44% of input energy that the applicant accepts will be wasted as heat dissipated in the environment.**

As referenced above, PPW also (5.10.11) requires that, in order to support Welsh Government targets for decarbonisation: *“The Welsh Government’s policy objective is therefore to avoid the continued extraction and consumption of fossil fuels”* and *“embracing the challenge of decarbonising our energy and transport sectors including phasing out of fossil fuels”* (p. 77).

The proposed plant fails on the following steps of the energy hierarchy (as set out in PPW Figure 10):

- *Reduce energy demand – the proposal does nothing to reduce energy demand*
- *Use energy efficiently – the proposal does nothing to improve energy efficiency, indeed the applicants set out that less than half (42.5%) of the energy from gas is converted to useful electricity, not counting the additional losses in the distribution network.*
- *Renewable energy generation – the proposal is not a renewable energy project*
- *Minimise carbon impact of other energy generation – the proposal does not incorporate CHP*

²⁴ <https://www.gwynedd.llyw.cymru/en/Residents/Climate-and-Nature.aspx>

It would fall into the last category on the hierarchy, that is, “other energy generation”, or fossil fuelled generation. As already noted, minimising the impact of the gas combustion would necessitate use of the waste heat through adopting combined heat and power, which is not proposed by the applicant. As Policy PS 6 of the JLDP sets out, in order to alleviate the effects of climate change, proposals will only be permitted where it is demonstrated that they have fully taken account of and responded to points including the energy hierarchy, which includes reducing energy demand, energy efficiency and using low or zero carbon energy technologies wherever practical. **This proposal does not satisfy that test.**

“The system will need to integrate renewable generation with storage and other flexibility services, in order to minimise the need for new generation and grid system reinforcement. Collectively we will need to concentrate on reducing emissions from fossil fuel sources, whilst driving further renewable generation which delivers value to Wales.”

It is disingenuous of the Applicant to suggest, in their *Supporting Statement*, section 4.2.3, that the energy needs of North Wales are supplied primarily via the Connah’s Quay Combined Cycle Gas Turbine, and therefore, by implication, that the proposal will meet ‘local’ electricity demand. The purpose of the UK electricity grid is to ensure sufficient supply, and to direct that supply to where it is needed. Indeed, the applicant notes that renewable energy provides up to 50% of the electricity needs in Gwynedd. And as Welsh Government points out:

*“Gas generation in Wales is increasingly changing from providing a steady, baseload supply to a more flexible peaking and backup role. There may be a role to play for small, reciprocating **CHP** plants which can respond quickly to market signals and provide flexibility to the network”²⁵*

But **this proposal is not a CHP plant** and therefore does not align with Welsh Government policy. The Welsh Government report continues:

“The role of fossil fuels in the future energy mix should be considered in the light of the Welsh Government’s policy objective to avoid the continued extraction and consumption of fossil fuels”.

Again, this proposal runs counter to that policy objective.

For the purposes of the ‘average emissions values’, emissions from start-up and shut down are not modelled (section 5.5.10 of Seiont Ltd’s *Air Quality Impact Assessment* v.1, and 4.5.10 in v2). The claim is that this is in line with the MCPD Directive – but given that the plant will be starting up and shutting down frequently, daily in winter, for example, then the issue requires further investigation.

Finally, **the Manufacturer’s Emissions Data** (Appendix 2 in the air quality report) has two sets of figures for emissions: Normal Pollutant Emission Concentration and Actual Pollutant Emission Concentration. The ‘actual’ figure is substantially lower than the ‘normal’ figure – this might be because of the argument that the plant is only operational for 36% of the time so they’re only modelling 36% of the value. But with a stop-start profile, and more generation during some times of the year (winter in particular) then the pulses of pollutants will be higher than an annual mean. This point also requires further investigation.

²⁵ <https://www.gov.wales/sites/default/files/publications/2021-01/energy-generation-in-wales-2019.pdf>

In particular, PEDW must make sure, in examining the Seiont Ltd application, that the following are carefully factored in:

- a) Wales is a net exporter of electricity so no new capacity can be argued on a lack of capacity point²⁶
- b) Consideration of the timeframe for the development is important. It's expected to be of use for 20 years, say 2025 plus twenty years - which would mean potentially until 2045) If the target is to be 100% renewable electricity by 2035 in Wales, then it's the pump storage and battery storage referred to above that should be providing flexibility by then, or existing plants. The case for increased capacity is not convincingly made, given that in 10 years' time the installation would be obsolete in any case.
- c) The location of the proposed plant means **transmission loss issues** are highly probable, meaning that **the site is an ineffective place to balance the grid.**
- d) The differentiated emissions impacts and comparison, referred to above, is clearly work that PEDW needs to ensure is given to them as part of the EIA, otherwise they could be making an unsafe decision, see "full environmental cost" in the *Finch* case below.
- e) the new ***Infrastructure Wales Act 2024***²⁷ makes clear the need ***to have regard to specific matters when making decisions on applications***; e.g. under Duty 57:

"In deciding an application for infrastructure consent, the examining authority or the Welsh Ministers (as the case may be) must have regard to— (e)the desirability of mitigating, and adapting to, climate change;"

The Act reinforces the relevance of climate change in decision making, and, whilst the duty is only a procedural one, any declaration by the Council of a Climate Emergency / Wales and UK gov Net Zero targets create a binding substantive duty – i.e. to achieve net zero by a certain date. Hence climate is so obviously material to the decision on the Applicant's case that it would be arguably irrational not to take it into account²⁸.

- f) In **Policy 24 of *Future Wales 2040: North West Wales and Energy***²⁹, gas-fired generation is not mentioned.
- g) **In light of the recent Supreme Court Decision on the *Finch* case**³⁰, PEDW must ensure that the question of Scope 3 emissions has adequate EIA coverage.

²⁶ <https://www.gov.wales/wales-aims-meet-100-its-electricity-needs-renewable-sources-2035#cohttps://www.gov.wales/sites/default/files/publications/2023-11/energy-generation-in-wales-2022.pdf> and <https://www.gov.wales/sites/default/files/publications/2022-12/energy-generation-in-wales-2021.pdf>

²⁷ <https://www.legislation.gov.uk/asc/2024/3/section/57/enacted>

²⁸ See *R (on the application of Friends of the Earth v Heathrow Airport Limited)* - §119 of the Supreme Court's decision.

²⁹ <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

³⁰ <https://www.bailii.org/uk/cases/UKSC/2024/20.html>

1.3.2. **Damage to the Natural Environment: Ecosystems and Biodiversity**

(See also section 2.3 in Appendix 1)

The various polluting and harmful effects of the proposed development on ecosystems, wildlife and biodiversity, resulting from both its construction and its operation, should be a major concern for decision makers. In addition to the threat of water and waterborne pollution covered below, both the air and the noise pollution, mentioned in relation to the community of people surrounding the site, will also affect the communities of plants and animals. All of these sources of pollution and disturbance threaten to damage delicate ecosystems and to negatively affect biodiversity.

1.3.3. **Impact of NO_x on the natural environment** *(See also Appendix 1, section 2.1.7)*

In paragraph 8.2.5 of the “Supporting Statement” (SS) submitted by Jones Brothers, they acknowledge the potential direct impact of “**N₂ from the proposed gas plant exhausts causing eutrophication of habitats associated with the Afon Seiont and nearby woodlands**”. Pollution from the type of engines proposed creates greenhouse gases that not only contribute to Climate Change but are very destructive, in a more immediate way, to nature. In addition to their wider and longer-term effects on biodiversity in general, if this application is successful it is sure to have an adverse effect on the nearby woodlands, the park and the wildlife that live in them including otters, owls, squirrels, bats, hedgehogs and foxes, as well as on flourishing bird and insect populations. Losing these due to pollution from the activity proposed would be a huge loss to our community as well as to the planet.

The mitigation measures suggested by Jones Brothers in respect of the NO_x emissions (SS 8.2.8) are only cited as a means of “**reducing**”, **as opposed to eliminating**, the anticipated harm. Given our earlier observations about dispersal issues, topography and the height of the proposed flues, the “mitigation” measures proposed, e.g. “planting to create buffers for nitrogen deposition into woodland” are particularly unconvincing.

Jones Brothers’ consultants, ITP Energised have noted in their Air Quality Impact Assessment that **significant effects are likely** at their identified “E1” receptor points, which are on the fringes of the woodland known as *Allt Rhyddallt Bach* (listed on the Ancient Woodland Inventory). The owner of that woodland was at no point approached by the consultants for her woodland, which is in closer proximity to the proposed site than the chosen E1 receptors, to be included in their study. There is good reason to suppose that *Allt Rhyddallt Bach* is likely to be more severely affected than the receptor points marked out in the Air Quality Impact Assessment and ITP Energised state in their “Conclusion”:

“Advice should be sought from the project Ecologist regarding the sensitivity of the particular woodland features to nutrient nitrogen deposition and whether or not an alternative assessment criterion for Critical Load is appropriate at these receptors.”

It is therefore considered essential that the impact of emissions from the proposed development on the Woodland, *Allt Rhyddallt Bach*, be thoroughly and independently assessed as a prerequisite for the application to proceed.

1.3.4. **Impact of Chronic Noise Pollution on wildlife ecosystems** (see also Appendix 1, section 2.3.1)

It has been shown that noise has the potential to be a major force that can restructure wildlife communities: changing spatial distribution and deterring wildlife from important feeding and breeding areas, or interfering with crucial biological functions such as foraging performance (more food handling errors and discrimination errors), predator avoidance, prey detection and communication. Furthermore, there are direct physiological costs associated with exposure to noise including reduced sleep and increasing stress hormone levels. These varied impacts can lead to negative consequences for individual fitness, population levels and community structures. For wildlife, as for humans, the duration, spectral and temporal characteristics of chronic noise exposure are as important as the amplitude of noise, when it comes to the long-term effects. **The noise metrics applied in Jones Brothers' commissioned Noise Assessment, are focused on human perceptual abilities rather than considering the varied hearing thresholds of animal communities; those clearly need to be considered in relation the proposed development.**

1.3.5. **Bats and Otters**

The Developers' commissioned ecological assessors, "eco-scope", were briefed to assess any "likely significant" effects from the proposed development and to "include steps to protect and secure a bat roost "linked" to SAC Glynllifon. At no point is the assessment sufficiently clear on the precise nature of the link.

Furthermore, the consultants' report makes no mention of the need for off-site protection of the Lesser Horseshoe bats and otters nearer to the Quarry site than SAC Glynllifon. Their own Table 2 (under 3.1.1 of the report) confirms that both species are present just 167m across the river, in the Woodland known as *Allt Rhyddallt Bach* (owned by one of the authors of this objection document). The owner of that Woodland was never approached by eco scope during their survey work to ask for data or a site visit. She also notes that NRW have been unable to rule out "significant effects on protected species".

As a minimum, no approval should be given to the proposed gas-fired plant without further extensive surveys of the bat and otter populations in *Allt Rhyddallt Bach* woodland and along the full length of the opposite side of the river from the Quarry site.

1.3.6. **Construction pollution** (See also 'Site drainage and water quality' - Appendix 1 page 25)

There is concern about various kinds of construction pollution in the building of the proposed plant – e.g. the potential pH changes and other damaging effects of run-off from the concrete laid for the base of the units and for the "crane pads to support a mobile crane" referred to in p 2.3.1 of Jones Brothers "Supporting Statement" (SS). In p 2.3.2 they go on to state: "An existing ditch running along the eastern edge of the former brickworks site, within the applicant's ownership, would be cleared if necessary to accept any surface run-off, though rainfall would initially be allowed to infiltrate the areas of stone surfacing as it does currently".

There is also good reason to be concerned about the potential for heaping around the proposed settlement ponds and the leaching of pollutants through the surrounding soil to adversely affect the river and surrounding ecosystems. Much is made in SS 8.2.8, and elsewhere, of the recommended mitigation measures that it is claimed will "reduce" the damaging impacts acknowledged in SS 8.2.5. **Our concerns are naturally that "reduction" of harm to surrounding ecosystems implies there will still be some measure of harm –**

and that is clearly unacceptable, especially in light of recent changes to PPW guidance on biodiversity.

Sadly there is current evidence of what would appear to be carelessness in general over construction materials apparently linked to the recent bypass construction: very large pieces of plastic land drain piping have been seen floating down the River Seiont, which will undoubtedly cause great disturbance to the otters known to frequent that stretch of the river.

1.3.7. **Phosphorous from facilities waste management?** (See also our Comment 12 on page 26 of Appendix 1)

In the Design and Access Statement submitted by Cadnant Planning on behalf of Jones Brothers, reference is made under 3.1 to a “welfare facility”, which raises the question of waste disposal, described in the statement as “drainage services”. In SS 2.4.1 – Table 2, reference is made to “possible waste from the toilet and washroom drainage being managed by means of “*mains drainage connection*”. It will be important to establish that mains drainage is available at the site, as previous temporary planning permission (C17/0107/19/LL) covered the installation of a “sewerage storage tank”. Those considering Jones Brothers’ proposal should ascertain what will be involved in the “mains drainage connection” referred to in SS 2.4.1 and ensure that there will not be septic tank or similar arrangements with a risk of phosphorous escaping into the environment including the River Seiont.

1.3.8. **Requirement for “Net Benefit to Biodiversity” - Very recent changes to Chapter 6 of Planning Policy Wales (PPW) for inclusion in PPW Ed. 12:**

The consultation on important changes to Chapter 6 is now over, and changes highly relevant to the proposed Jones Brothers development are now in force, the **letter to all chief planning officers from Julie James, Minister for Climate Change**, having been **published with immediate effect on the 18th October 2023** (see footnote 2 above).

A previous Chief Planning Officer letter was published in December 2022, which highlighted the essential role that the planning system must play in meeting the challenges laid down by COP15 and in fulfilling the *Environment Act Section 6*³¹ duty in Wales. The letter also signposted that the proposed changes to PPW, now issued, would be forthcoming.

The focus of the recent changes in PPW Chapter 6 is primarily on **net benefit for biodiversity (NBB) and the resilience of ecosystems**, including changes to 6.2 and 6.4, a redrafting of the section covering the “**Step-wise**” policy and a **strengthening of policy on trees and woodland**. The revision also includes the requirement for a **green infrastructure statement to accompany planning applications** and an attempt to provide such a statement has now been included by Jones Brothers in their final *Supporting Statement*; **our comments on that inadequate insertion can be seen in Appendix 2 to this document.**

Clearly, now that these changes are in force, Planning Authorities (local and national) must ensure that they are robustly applied to the case of the Jones Brothers’ proposal.

Net benefit for biodiversity (NBB) is defined as, ‘*the concept that development should leave biodiversity and ecosystems in a better state than before, through securing long term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.*’

Given that the Quarry site is already in a much damaged and depleted state following the recent bypass construction operations, it has not been hard for the contracted environmental consultants to suggest in their report, measures that, if fully implemented, could improve the site itself. However those measures do not adequately address the

³¹ <https://www.gov.wales/biodiversity-and-resilience-ecosystems-duty-section-6-guidance-public-authorities>

wider, longer-term effects of the proposed gas-fired peaking and concrete processing plant on immediately surrounding ecosystems, to which NBB must obviously also apply, given that they will be directly affected by chronic noise, air pollution and soil and water contamination from the site.

The outcomes of applying the NBB principles to a development should be that:

- biodiversity and ecosystem resilience is maintained **and enhanced**;
- a **biodiversity uplift** on site is secured **over and above that required to mitigate** or compensate for a negative impact, and
- developments are sustainable, ecologically resilient, healthy, and **deliver multiple benefits for the well-being of local people.**

The “Step-wise” approach is set out very clearly in the revised version of PPW Chapter 6:

*“Planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and **deliver net benefits for biodiversity** by ensuring that any adverse environmental effects **are firstly avoided**, then minimized, mitigated, and as a last resort compensated for.”*

*“The first priority for planning authorities is to **avoid damage to biodiversity in its widest sense** (i.e. the variety of species and habitats and their abundance) and ecosystem functioning. Where there may be harmful environmental effects, **planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.”***

To quote from Welsh Government’s consultation document on the “Avoid” element in Stepwise: **“Consider whether the development is really needed, whether it could be located elsewhere”**.

The proper application of the first Step-wise principle, “Avoid” requires that planners and developers should **only** move on to the other stages of Stepwise **“When all options for avoiding loss or damage to biodiversity have been exhausted....”** The Step-wise section in PPW states **“Finally, where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused”**.

As illustrated in the introduction to this document, the only apparent “material consideration” in favour of siting a gas-fired peaking plant on this particular site is Jones Brothers’ ownership of it and the income their company will make from the plant, courtesy of an ill-advised UK Government loophole³² in tax on fossil fuel electricity generation.

It must surely be the case that, in relation to all the risks to biodiversity listed in **Jones Bros own commissioned assessment as requiring “mitigation”**, the **Step-wise principle** must be applied. In its updated form, that principle stresses **Avoidance** of disturbance harm to biodiversity as the first and **primary duty** of planners; “Mitigation” is **only** relevant and applicable **where Avoidance is not possible**.

Our reading and reasoning in relation to the recent changes to PPW Chapter 6 is that application of the NBB and Step-wise Principles must take account of inevitable adverse impacts on, and certainly no net benefit to the richly biodiverse and delicate ecosystems surrounding the very close and topographically threatening quarry site itself.

³² Peaking plant income has been, many believe wrongly, exempted from the tax imposed on other fossil fuel generation operations

Furthermore, the damaged and already nature-depleted state of the Jones Brothers' site (highlighted in their own commissioned environmental report) should clearly not be used as "cover" for "lowering the bar" on wider NBB!

The Green Infrastructure Statement included in the final version of the Applicant's Supporting Statement has been cursorily written and is wholly inadequate in terms of the purpose and requirements set out in PPW Edition 12, key extracts from which are copied below (*our emphases*):

Careful note should be taken of the fact that **PEDW's recent approval** of an energy project, a solar farm in South Wales proposed for a site deemed to be unsuitable for biodiversity reasons, **was overturned by the Welsh Government Minister, Lesley Griffiths** on the grounds that the **Step-wise** principle had not been applied. It is clear, to those submitting this objection document, that the same reasoning should be applied to the Jones Bros. proposal. We believe that any planning committee or branch of Government, with recommending or decision-making powers in relation to it, should **apply the Step-wise Principle in this case and avoid the damage that Jones Brothers' consultants recommend "mitigating" by simply refusing the application.**

2. Individual Submissions and Community Concerns:

- **An appraisal of Jones Brothers proposals by Ecologist Dr Andy Stenson - addressing concerns about both of Jones Brothers' applications: the peaking plant and the concrete crushing plant, which are proposed close together on the same site and should not be considered independently of each other:**

The two proposals by Jones Brothers pose several issues for both the natural environment and human population and, as such, there are many significant scientific reasons for objection to the proposals. The surrounding area includes residential properties, a hospital, and sports facilities, as well as an area of designated ancient woodland, the river and public footpaths which are utilised by walkers, dog-owners, anglers, naturalists, and canoeists, including local residents, visitors and tourists.

The proposal to build a gas-powered peaking plant and, more recently a concrete crushing plant, will inevitably threaten the rich ecosystems within and around the site, woodland, and river. There are a lot of predatory species such as dragonflies, bats, hedgehogs, salmon, and mergansers, including numerous apex predators such as sparrowhawks and otters, and the presence of so many taxa that feed on other animals is indicative of a rich, productive ecosystem.

The proposals will also result in significant disturbance for residents, both during the construction and throughout the facilities' working lifetimes. These proposals will affect residents, visitors, and the local environment, both immediately and stretching into the future. This area, although in Caernarfon, is rich in wildlife and fauna and allows easy access for residents without the need to travel; it therefore represents a significant resource for the physical and mental health of the community.

The potential threats to the people and organisms of the Seiont River area include:

Noise and Vibration

Noise pollution does not just affect organisms such as birds that communicate using sound, but also adversely affects those with no obvious connection to the acoustic environment, even in adjacent quieter areas (*Senzaki et al, 2020*) and noise pollution has been shown to reduce biodiversity (*Sordello et al, 2020*). Particularly in woodlands, birds rely on sound to communicate with other individuals and one of the main operating times for the facility will be during the pre-dawn hours during which birds establish territories through vocal communication. Disruption of this normal behaviour may significantly reduce reproductive success and result in decreases of local populations. This, in turn, will have knock-on effects throughout the ecosystem.

The gas-powered production of electricity will be disproportionately utilised during the winter months when many species will be hibernating. Disturbance during hibernation may be devastating. Arousal to an active state when there is little chance of finding food will deplete food reserves (*Gilbart, 2018*). Anthropogenic noise has also been shown to be disruptive to predators that rely on sound (*Siemers & Schaub, 2011*). Operation of the turbines during the most probable periods of use will reduce success rates for the numerous crepuscular and nocturnal hunters, such as owls, found in the woodland and surrounding area. The noise from open-cast mining has been shown to reduce foraging behaviour in bats (*Theobald et al, 2020*) and the combination of these two projects may be particularly disruptive to the bats hunting, roosting and/or hibernating close to the site.

Concrete and Dust

During the construction of the two facilities and throughout the operating lifetime of the concrete crushing plant, concrete and dust will inevitably escape into the surroundings. This will have concomitant impacts on the soil properties over a considerable area, including the river and ancient woodland. Alkalization and subsequent alteration of soils physicochemical properties will affect mineral concentrations potentially disrupting microbial activity, root growth, shell production in molluscs.

Dust may settle on leaf surfaces reducing photosynthesis and/or block stomata hampering gas exchange or triggering water stress (*Farmer, 1993*). This will result in a loss in primary productivity, reduction in new biomass and decreased reproductive success. Dust settling into the water course may also affect gas exchange in aquatic invertebrates by clogging their gills and can prove fatal to some aquatic organisms.

Oxides of Nitrogen

Gaseous oxides of nitrogen react with atmospheric water to form nitric acid which can change soil chemistry and lead to a loss of biodiversity (*DEFRA, 2023*). On the cold, still nights when the electricity generating facility is most likely to operate, the topology will result in accumulation of this effect within the valley and the river where the pH will inevitably drop. This will have profound effects on the plants, invertebrate communities and the ecosystems that depend upon them. Increased NO_x concentrations damages foliage, reducing primary productivity and total amount of energy fed into the ecosystem (*de Vries, 2021*).

Human Health and Well-being

There is a rugby club, hospital and residential properties close to the site and the topology of the area will mean that the effects of the projects will be concentrated into a small area, especially on still nights when the production of electricity will be most likely. Nitrogen oxides increase asthma and other respiratory conditions (*de Vries, 2021*), and exposure during exercise exacerbate these effects, so although recreational users may only be exposed for relatively short periods, they may be affected disproportionately.

Inhaled dust will also have adverse effects on the health of residents as well as those exercising in the area. Residents will be exposed not just to particulates but to noise pollution. The turbines will be used during the early hours of the morning when demand will be higher and disturbance of sleep leads to both physical and mental health deterioration. The potential for continuous noise from the concrete crushing plant throughout the day would compound the issue.

The creation of significant areas of non-permeable surface will alter the flow of water through the site and beyond. A number of properties around the site are already in an area of flood risk and any change in surface water run-off will only make the risk greater.

The Future

The urgency with which a reversal in the decline in biodiversity must be addressed has been widely acknowledged, as has the importance of invertebrate life in Wales (*Robins, 2023*) and the diversity of predatory species, including bats, kingfishers and sparrowhawks, is indicative of healthy aquatic and terrestrial ecosystems (*Natsukawa & Sergio, 2022*). The presence of otters is also considered as a key bioindicator of a healthy aquatic ecosystem (*Ruiz-Olmo et al, 1997*).

Needs and influences on the health of ecosystems are seldom obvious but any perturbation of a vibrant ecosystem is unlikely to be anything other than detrimental. As outlined above, there are many reasons why the proposals will adversely affect the Seiont River area, both above and below the proposed site. The Welsh Government has shown that it recognises the importance of reducing the harm to the environment at all scales from local to global (*Environment (Wales) Act 2016*), with Lesley Griffiths (Minister for Rural Affairs) referring to the situation as a climate emergency (29th April 2019). The Welsh Government has also committed itself to future generations (*Wellbeing of Future Generations (Wales) Act 2015*). Ecosystems can all too easily be changed or lost, but are much harder, even impossible, to rebuild. The area around the Seiont River, though far from unspoilt, is clearly a healthy, diverse and productive ecosystem and should be seen as an opportunity not only save, but even enhance, the environment.

Whilst gas-powered peak plants could be necessary in the short-term, causing long-term harm that will affect many generations surely must be avoided. Such heavy plant developments should be concentrated into areas where similar facilities already exist. This area provides opportunities for recreation and exercise for locals and tourists alike, as well as safe space for wildlife close to the town centre and that should not be lost. The Welsh Government has shown its commitment to the future through Climate Action Wales and the Welsh Government Nature Recovery Plan and these schemes would be in complete contradiction.

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- **A letter from Datblygiadau Egni Gwledig (DEG):**

The opportunity to reply to the consultation on the Seiont Quarry proposal was appreciated and we commend the Welsh Government on their policy of shared ownership, declaration of climate emergency and ambitions for both the growth of locally owned energy and arriving at net zero by 2050.

DEG is a social enterprise supporting community led action across north west Wales. We aim to increase our area's ability to cope with the rising cost of fossil fuels and improve our natural environment whilst supporting communities transition to zero carbon. We've supported 150 community groups on this mission and have recently, as part of the GwyrddNi movement, completed a series of Community Assemblies on the Climate that brought together over 250 people in five areas of Gwynedd to discuss, share and act locally to tackle climate change .

With this experience behind us and having heard local people's concerns about the changing climate and desire to have more renewable energy owned locally, we were surprised to read that there was a new gas power plant being proposed to be built on the outskirts of Caernarfon. We know that no new gas power stations can be built if we are to meet our targets of Net Zero. Here are just a few of our objections based on evidence from leading world organisations;

According to the International Energy Agency, no new oil, gas or coal development can be permitted if the world is to reach net zero by 2050 and limit global warming to 1.5°C.³³

Gas power stations emit greenhouse gasses that contribute to climate change and air pollution. They also require large amounts of water and land, which can affect ecosystems and biodiversity.³⁴

³³ <https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist>

³⁴ <https://royalsociety.org/-/media/policy/projects/climate-change-science-solutions/climate-science-solutions-ccs.pdf>

Renewable energy sources, such as wind, solar, hydro and biomass, are cheaper, cleaner and more sustainable than gas power stations. They can provide reliable and flexible electricity supply without harming the environment or human health.³⁵ The Welsh Government have just this week refused planning of two solar farms on this basis of damage to biodiversity and ecosystems³⁶

The UK Government has already made significant progress in decarbonising its electricity sector, with renewable energy accounting for more than 40% of the generation mix in 2020.³⁷ The UK Gov has also committed to phase out coal-fired power stations by 2024 and achieve net zero emissions by 2050, whilst European neighbours are phasing out the burning of gas.

To reach net zero by 2050, the UK needs to invest in energy efficiency, demand management, grid modernisation, and energy storage. These technologies can help reduce emissions from power and industry sectors, while creating jobs and economic opportunities.

Parliamentary evidence has shown that if gas was decoupled from renewable energy sector prices, that this would save £3bn a year on our energy bills - this is because renewable energy prices consumers pay for electricity is largely determined by the price of natural gas - we must move away from this outdated practice.³⁸

Finally, DEG encourages and develops community owned energy projects and shared ownership models - there are local community groups who could develop energy sites like the one in question to benefit the community. The 2021 State of the Sector Report on Community Energy in Wales found that Wales has a higher percentage of community energy groups than Scotland and England, but is behind both on MW produced. From the profits made, we know community groups don't just reinvest in renewable electricity generation, they saved individuals and communities £288,000 in 2020, almost 7,000 people were supported through other initiatives such as low carbon heat, transport, fuel poverty, and energy efficiency.

Community energy put into practice the pillars of the Wellbeing of Future generations Act 2015, providing economic, environmental, social and cultural/linguistic benefits. All across Wales communities are powering their communities (825 MW produced in 2020 with the Welsh Government target of 1GW by 2030) through leading on their own projects and developing local skills in a modern and quickly advancing field. An engaged energy citizenship will be necessary for achieving net zero and we are calling for the Welsh Government to get behind this movement, and provide real, demonstrable support for the sector.

DEG believes a new gas power station contravenes the principles of the FGA 2015 set out in Table 1 of the Act. The granting of a new gas power station would be in contempt of the Act and of the future generations who are relying on us to get this right, now. DEG would also strongly object on the grounds that this project would have no permanent workers on site.

*Yours sincerely
Grant Peisley,
DEG Director*



³⁵ <https://www.mckinsey.com/industries/electric-power-and-natural-gas/our-insights/facing-the-future-net-zero-and-the-uk-electricity-sector>

³⁶ <https://www.bbc.co.uk/news/uk-wales-politics-66359688#:~:text=Rural%20Affairs%20Minister%20Lesley%20Griffiths,new%20energy%20projects%20in%20Wales>

³⁷ <https://www.nationalgrid.com/stories/journey-to-net-zero/national-grids-net-zero-commitment>

³⁸ <https://commonslibrary.parliament.uk/why-is-cheap-renewable-electricity-so-expensive/>

- **A note from Llais y Goedwig**

Llais y Goedwig is a Wales-wide organisation that supports community woodlands and community focused small woodland owners, including some in the area surrounding the Jones Brothers proposal.

In order for communities and local economies to thrive they need to have access to good quality, healthy and biodiverse green spaces and woodlands that they can enjoy, develop and benefit from without fear of adverse effects on their own health and wellbeing.

The proposal as laid out by Jones Brothers will, in our view have a negative impact on the health of the local environment and the people and communities that live in the area.

Decreasing the quality and opportunities for people to interact with nature and have a say in what happens in their local area goes against the basic tenets of the Well-being of Future Generations Act, and our pressing need to respond in a positive way to the climate and biodiversity crises.

Other Voices from our Community:

Two Community Meetings have been held concerning this application (on the 30th November 2023 and the 11th June 2024) allowing a total of 140 people to discuss their concerns about the Jones Brothers proposal. The clearly expressed wish on the part of those attending the meetings was that, in the event that the proposal proceeds to formal application stage, it should not be granted permission. Included below are some of the comments that members of the community have made, both before, during and after the meeting. Several of these comments were also submitted through the Cadnant Planning pre-application consultation site.

- *“Have any surveys been carried out? Just because the site has been used by Jones Brothers, it does not mean there is no wildlife present. The applicants mention the existing vegetation along the edge of the site and the developing young woodland on the site, but makes no mention of surveying what species are present or may have colonised the new habitat nor is there any assessment of the potential disturbance this development may pose to them. The application also makes light of the effects this development will have on surrounding habitats. Just because there are no ‘European designated’ sites close to the proposal, the local habitats are not disposable, and it is the importance of all wild spaces that underlies current Welsh Government policies on environmental protection and commitments to future generations. Adjoining habitats include a site recorded on the Ancient Woodland Inventory that is home to a population of bats and a river rich in wildlife, including kingfishers and otters. These areas are not only highly important to the species found there, but also to residents and visitors.*

The current site is regularly the source of significant pieces of material, including 5m lengths of pipe, floating down the river. These will have represented significant financial losses, but the company was unable to prevent their entry into the river. How can anyone be confident that the measures being put in place will be effective in controlling runoff water and fine particulates?

Perhaps most significantly, Jones Brothers undertook to restore the site as a condition on a previous application C17/0011/19MW. This would have seen considerable enhancement of the environment including tree planting across large parts of the site. However much the applicants may seek to minimise the effects of this new development, it will, if allowed to proceed, constitute a considerably more harmful option for the environment. Surely, this attempt to

renege on environmental commitments made in the past, from which the company gained financially, should be being considered. They talk of planting wildflowers and creating corridors as if it was a compensation for their new proposals when far more extensive restoration they committed to previously is being ignored. That is not a net benefit!

It should also be noted that the company has submitted a planning application to build a tarmac access road to the North-East for a proposed concrete crushing plant. Along with the dust, exhaust, rubber and brake particulates, this will make any idea of wildlife corridors utterly redundant and its inclusion as some sort of mitigation in this application is no more than a cynical attempt to gloss over the environmental damage the company is planning.

It may be called a “brownfield” site, but not all such sites are equal. The Seiont Quarry site is not heavily industrialised and this development will see an increase in the long term exploitation of the site. The previous commitments mentioned above were to a restoration with which any new projects would be entirely contradictory. These turbines and associated structures will not be easily removed and their presence will increase the likely further development of the surroundings, for example the proposed concrete crushing plant. Allowing this development would be the start of a stepwise degradation of the site with ever more harmful developments being allowed in the future.

If the case is being made to continue burning fossil fuels for a few more decades, surely enlargement of existing facilities or placing new ones close to them, would be preferable to having multiple, new sites scattered throughout the region”.

- *“We feel there are a number of reasons to object to the proposals. The site lies in an area of historic and ecological significance. The quarry site and the surrounding area have become a habitat for many species of plants, invertebrates and vertebrates, with populations of butterflies, dragonflies, bats, kingfishers, herons, mergansers, jays, woodpeckers, salmon and otters. It has recently been predicted that the River Wye salmon population will disappear in the next few years, so rather than risk perturbation of the local ecosystem, it would make more sense to look for options that would maintain or enhance the environment.*

Benefits to the local employment market will be minimal, mainly favouring non-local and/or short-term jobs. Focus should be more sustainable/long-term options as we are supposed to be creating an environment for the future, yet gas is a short-term fix. Access to the site via Seiont Mill Road may also be problematic with restrictions on the size of vehicles. Access to the area is poor and so much activity will no doubt impact on the residents.

During both the construction phase and operation, the facility will generate considerable noise, gas and particulate pollution. This pollution will have significant effects on aquatic and terrestrial ecosystems, as well as residents, from air quality, dust accumulation on foliage and chemicals in run-off. The topology will serve to concentrate all the effects in an area with residential and recreational use, such as canoeing and fishing affected. Once these habitats are damaged, they will be lost for future generations.”

- *As much as there may be purported justifications for necessitating a fossil fuel powered peaking plant in order to balance out grid fluctuations, there are several caveats that need to be carefully considered first.*
 - *There have been cases where on-shore solar and wind farms of sizes such as 30 MW have not been given planning permissions to be connected to the grid due to the*

inadequate grid capacity. Substantial upgrades are needed to our grid and infrastructure and the cost of neglecting these improvements needs to be carefully considered before investing any additional resources on fossil fuel-based energy sources.

- *There have been promising developments driven by small, grassroots and community-owned organisations such as Partneriaeth Ogwen with the Ynni Ogwen hydroelectric initiative in Bethesda. They've successfully shown the impact of coupling behaviour (and therefore, demand) change that is also in perfect alignment with energy production from the hydroelectric power plant – all without necessitating fossil fuel powered peaking plants. This not only improves local resilience, but by allowing the energy production to be decentralised and distributed (not to mention decoupled from exhaustible fossil-fuels), the chances of single points of catastrophic failures are also significantly reduced.*
- *It has been argued in the scientific literature that a just transition to renewable and low carbon energy sources would not be possible without the help of nuclear and other non-renewable sources as stepping stones. The key qualifier being the requirement to intelligently triage this non-renewable energy in order to facilitate a swift and just transition to the Net Zero Emissions 2050 Scenario. Counterbalancing the constraints imposed by the Well-being of Future Generations Act 2015 with our current energy demand, if there is any justification to be made for investing in polluting and exhaustible energy sources, it should be **solely** for the domestic production of renewable energy technology units in order to minimise the overall embedded energy/carbon in having these manufactured and transported from across the world. If we are serious about our national and energy security, we should wholly own the means of domestic renewable energy generation and the associated production pipelines and logistics involved in its deployment.*

- *“It might have been welcome news to hear that a Welsh business is considering investing in new energy generation; however, the proposed development of a gas-fired peaking plant is not the best contribution in support of local aspirations to achieve net zero by 2030. Would it not be a better investment for Jones Bros., the local community, the environment and future generations to develop renewable energy on this site? Have any feasibility studies been done on the generation capacity of the site and how this might compare with the proposed gas-powered peaking plant? The site has low visual impact and has access to the river and sea via a series of weirs on the Seiont. Might it be suitable for solar generation? Could it serve as a depot for solar drying of wood for firewood or manufacture of biomass-based solid fuels to replace coal? If a peaking facility is needed could this be achieved through the use of batteries or perhaps find some way to use all those bricks as a heat sink? Any of these would find a place in the Local Area Energy Plan and therefore attract support and funding directed at decarbonisation and the transition to net zero (e.g. Smart local energy <https://ambitionnorth.wales/low-carbon-energy/smart-local-energy/>). Although Jones Bros. counts as local ownership under the Welsh Government Policy statement: local ownership of energy generation in Wales – benefitting Wales today and for future generations (<https://www.gov.wales/local-ownership-energy-generation-wales-policy-statement>), this would be much strengthened by partnering with a Caernarfon-based community energy group. There is considerable local experience with community ownership of renewable energy as well as Community Energy Wales who could help inform and support development of the site as a community energy hub for Caernarfon. A development of this nature would place Jones Bros and the site at the forefront of renewable energy innovation rather than as laggards building technology which will exacerbate climate change and which we all hope will be obsolete by 2030.”*

- *“I wish to make it clear that we are totally opposed to the development JB are looking to put planning in for.*

The fact is that the residents of Seiont Mill Road only have one access road and this would be in constant use with the works.

It’s concerning that the proposed peaking plant will be using fossil fuel to create their electricity - what will this do to the environment around us, our lovely park and wildlife?

We also have bats around this area, which I see nightly - they are a protected species.....

I also know that this development goes against Cyngor Gwynedd’s carbon efficiency policy and if the decision was to be made by CG I am confident that it would be refused.”

- *“My overall concern is that this development would be situated in the centre of a considerable residential population. Schemes such as this should be located well away from our sort of area.”*

- *“I wish to raise awareness of a concerning situation arising in Caernarfon due to the intention of Jones Brothers Ruthin to submit a planning application to the Planning and Environment Decisions Committee of Wales (PEDW) to build a power station (10 engines) to burn natural gas on the site of the old Caernarfon brickworks to generate electricity according to demand from the grid.*

While appreciating that there is pressure to create electricity production sites for the national grid, unfortunately, this site is in an unsuitable location for burning gas.

We live on the Penybryn Road on the south ridge near the woodlands but because they are deciduous trees we can see down to the brickworks during autumn and winter. Although we are not concerned with the visual aspect of the plant we are however very concerned about the emissions generated because of the low-sunken position of the plant.

We, like many others, have submitted comments to Cadnant Planning as part of the consultation process but there is no guarantee that we will receive a response or if our comments will have any influence on the application.”

- *“I strongly oppose the proposed application by Jones Brothers and find it quite disturbing that a Peaking plant is even being considered so close to a residential area when studies claim that emissions from such plants can lead to serious health risks:*

‘Natural gas power plants do not move - they just sit there and emit NOx when they are operating. Those NOx emissions linger in nearby communities leading to serious health problems for the people living near plants.’”

- *“We as a family and along with many other residents in the area are very concerned about what is being proposed for the following reasons:*
 - ***Previous construction work by Jones Bros Ruthin Cyf and their failure to adhere to agreements;***

- *Cyngor Gwynedd's climate emergency and nature plan, this being a complete contradiction;*
- *A reduction in our air quality;*
- *Noise*

I formally object to this development and have contacted my local councillor and Senedd member."

- *"I want to strongly object to the development of the Gas-fuelled development at Seiont Brickworks.
The ten engine chimneys are far too low and are going to be built in a shallow dip with our houses above it.
The toxic NOx gas will be blown towards us at Pen y Bryn and Muriau Park as well as the Eryri hospital and the Hendre Estate in Caernarfon.
That Gas is known to cause severe breathing problems and I am asthmatic.
The new by-pass built nearby has caused us more air pollution and this will be even more serious.
One reason given for building the new By Pass was to improve the air quality of the people of Caernarfon, so why now build something much more toxic and air-polluting?
It should not be built so close to where so many people live.
Previously these chimneys have been built much higher for air to go further into the atmosphere."*

**THE COMMUNITY GROUP OBJECTING TO THIS PROPOSAL
HAS A WEBSITE AND FAST GROWING PETITION
FOCUSED ON
THE HARM THAT WILL BE CAUSED
BY THE TWO JONES BROTHERS DEVELOPMENTS:**

<https://caernarfonlan.cymru>



3. The Overall Objection:

As we illustrated in the Introduction to this document, the impact of Jones Brothers' proposed development would be, to varying degrees, negative across all seven of Wales' National Well-being Goals. Their own pre-submission documents acknowledge a few, but by no means all of those negative impacts and appear to 'address' them by presenting them in the midst of a forest of seemingly careful and balanced scientific assessment, with much reference to "mitigation" and by playing down of the scale of adverse effects, e.g. in suggesting that the raising of air pollution just a little above a currently existing level of pollution would be so negligible as not to matter.

There are, in fact, at least two aspects of the proposed activities on the Seiont Quarry site for which there can be **no effective 'mitigation'**:

- the topography of the site and its pollution-concentrating and sound-amplifying effects and
- the nature, level, frequency and duration of the noise that will be generated.

The approach that Jones Brothers rely most heavily upon in their pre-submission material involves reassuring references to "**mitigating**" the negative effects and harms likely to result from their proposed development. "Mitigation" is a category of action taken to **reduce**, as opposed to **eliminate**, the harshness, harm, painfulness or dangerousness of something regarded as **inevitable**. The term is invariably applied to actions or situations that are **unavoidable**, for example: a judgement passed down in law; the effects of a chronic or terminal illness or natural phenomena such as pandemics, sea level rises, flooding or climate change itself; in the context of Government, the term is often applied when action is needed to soften the consequences of decisions that have **had to be made** for very compelling reasons.

The primary reason for siting the proposed Gas-fired STOR plant in Seiont Quarry is the profit that would flow from it to Jones Brothers and its shareholders, profit with no resulting employment or other benefits to our local economy. No "compelling" reason can be offered for approving the plant on the site proposed; it has been opportunistically targeted, simply as a means of maximising income from land bought very cheaply and then badly damaged by Jones Brothers in the course of their work on the Bontnewydd Bypass.

Given that mitigation measures, upon which the company's proposal places such complacent reliance, are measures to be applied in circumstances of inevitable harm, decision makers in this case should ask themselves whether the many acknowledged and unacknowledged harms highlighted in this objection document are indeed inevitable. The present and future harms threatened by Jones Brothers' proposal, to people and to the natural environment upon which they depend, **are not inevitable**, they can be **avoided** by means of a **wise and caring decision**.....

Decision makers at the local and national level and the public servants charged with implementing their policies and adhering to legislation **can, and surely must do everything in their power to prevent approval of this universally unwelcome proposal.**

Afterword.....

We are in no doubt that, if Jones Brothers' consultants *Ecoscope* were to be given a different brief and asked to advise on the **full remediation and ecological enhancement of this damaged site**, they would do an excellent job and one that they might very much prefer. Once properly remediated and made safe, the site could even be put to use for an educational project not unlike that illustrated and described in the introduction to this document. There would be many local jobs, both initially, in the remediation, and longer-term, in the conservation, education and

other sectors. No doubt some grant funding could be applied for at all stages of the project and, although any such funding would not bring profit-swelling benefit to Jones Brothers, at least their reputation might benefit somewhat..... They could, and in our opinions should sell the site (for less than the very low sum they paid for it before it was still further damaged) or lease it, at a peppercorn rate, to a social enterprise or community group so that good work can be done there.