

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended)

SCREENING OPINION

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PCC Ref. No.: 23/0402/SC

Proposal: Installation of a Battery Energy Storage System with Associated Infrastructure

Location: Land South Of Goldborough Road, Hundleton, Pembrokeshire

Part 1

Particulars and Location of Development

1. This EIA Screening Opinion has been adopted having regard to the following document (that comprises the “EIA Screening Opinion Request”):

Environmental Impact Assessment Screening Report Ref. P16-SCR
July 2023 supported by covering letter dated 26th July 2023 Ref.P16-SCR

2. The proposed development (the Development) is described at 3. of the EIA Screening Report.

Part II

Particulars of Decision

3. The Pembrokeshire County Council (the “competent authority”) hereby gives notice in pursuance of the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (the EIA Regulations) that in its view:

The development referred to in Part I hereof is a Schedule 2 development, one that does require Environmental Impact Assessment because the development, cumulatively with other development in the locality, is likely to have significant effects on the environment in respect of ecological and visual/landscape impacts.

Reason for Decision

Schedule 1 Development

4. The Development is not a Schedule 1 development.

Schedule 2 Development

5. The Development is not within a “sensitive area” as defined in the EIA Regulations.
6. The Development relates to the Energy Industry (Part 3 of Schedule 2) and is one for the storage of energy. Whilst battery storage projects are not specifically referenced in Schedule 2 such projects are a subset of energy generation. In determining whether a particular proposal for development is included within one of the categories of development local planning authorities (LPA) should have regard to The European Court of Justice that has ruled that project categories are to be interpreted widely because of the broad scope and purpose of the EIA Directive.
7. Given this, it is therefore considered that the development is a subset of and constitutes Schedule 2 development under Section 3(a) *‘Industrial installations for the production of electricity, steam and hot water’*. The area of development exceeds 0.5 hectares.
8. The relevant issue in determining whether EIA is required is whether the Development is likely to have significant effects on the environment. Schedule 3 provides the “selection criteria” for this purpose (Schedule 2 provides indicative thresholds to assist consideration of “significance”).

Schedule 3 - Significance

9. There are no apparent complex or potentially hazardous environmental effects. Impacts in relation to natural resources and human health are unlikely to be significant and this includes the effects from pollution (including noise, air and water quality). Any adverse effects are likely to be able to be satisfactorily mitigated. There is no evidence that there is likely to be a risk of major accidents/disasters. Environmental impacts during the construction phase are unlikely to be significant subject to control via a Construction Environmental Management Plan as well as a landscaping

management/re-establishment plan in respect of the proposed cable route. The generation of waste would be limited. Matters relating to contamination are unlikely to be significant. Pollution & other nuisances post-construction would be limited. Transportation impacts are unlikely to result in significant environmental effects subject to a Construction Traffic Management Plan being implemented.

10. Schedule 3 requires the consideration of potential cumulative environmental effects with other existing development and/or approved development. In addition to the existing power station, there are a number of approved developments within close proximity that include a cable and sub-station associated with the Erebus offshore wind development (approved), a cable route and converter station (under construction) associated with the Greenlink Interconnector (both of which were subject to EIA) and the development of a synchronous condenser at Pembroke Power Station (approved).
11. With regard to the potential environmental impact on ecology, at this stage any mitigation cannot be confirmed as potentially sufficient to avoid significant environmental effects. The nearby Pembroke Marine SAC could also be effected by the development. Notwithstanding these matters that relate solely to the potential effects of the development itself, the cumulative environmental effects with those other developments referenced in this Screening Opinion are likely to be significant for EIA purposes.
12. The development would be situated in the countryside. Although smaller in scale compared to other developments nearby it is not strongly associated with these. The development risks the further fragmentation of the rural landscape at this location and to contributing to the industrialisation of the broader landscape away from the major installations. As such the development is likely to have adverse environmental effects by reason of visual and landscape impacts (and potentially related impacts on the historic environment) that are likely to be significant when considered cumulatively with those other developments referenced in this Screening Opinion.
13. Whilst not consented development, EIA Scoping and/or Screening Opinions have/are being considered by the LPA for battery energy storage systems at both Lambeeth and land to south of Pembroke Power Station, a green hydrogen project at Pembroke Power Station, and cable and sub-stations associated with two other floating off-shore wind developments. This screening opinion is not determinative and can only be taken in the light of information and conditions available at that time. These developments, depending on timescales, may also become matters that should be considered cumulatively for EIA purposes.
14. The development is therefore, when considered against Schedule 3 criteria, likely to give rise to significant effects on the environment having regard to the potential cumulative effects with other development in the locality in respect of ecological and visual/landscape effects.
15. In accordance with Regulation 5 (8), this Screening Opinion has taken account of the information provided, the available results of other environmental assessments (of which there are none of material relevance that would alter the conclusions made herein) and the selection criteria set out in Schedule 3.

16. This decision takes account of the duty placed on the LPA, as a public body, by the Well-Being of Future Generations Act 2015 (“the WFG Act”) to carry out sustainable development. In order to act in accordance with the sustainable development principle, the LPA have taken into account the ways of working set out in section 4 of “SPSF1: Core Guidance, Shared Purpose: Shared Future – Statutory Guidance on the Future Generations Act 2015” by following the EIA process. The EIA process aims to prevent, reduce or offset any significant adverse environmental effects, including long-term effects, of development proposals and enhance positive ones. The process is integrated with the planning system to ensure planning decisions consider the environmental effects of development. In accordance with section 3(2) of the WFG Act and the well-being objectives, the EIA process followed will help to “manage, use and enhance Wales’ natural resources to support long-term well-being” by informing the decision making process on whether the development is likely to have a significant environmental effect.
17. In accordance with Regulation 6(8) of the EIA Regulations, where an LPA adopts an opinion to the effect that the development is EIA development, a request for a Screening Direction can be made to the Welsh Ministers.



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Head of Planning
Pembrokeshire County Council

31st August 2023

