



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

EIA SCOPING OPINION

Applicant

Pembroke Green Limited

Agent

Richard Moore
Enso Energy Limited
richard.moore@ensoenergy.co.uk

Part I - Particulars of application

Date of application:
10th October 2023

Application Number:
23/0616/SO

Particulars and location of development:

Installation of Battery Energy Storage System on land at Goldborough Road, Hundleton, Pembroke, Pembrokeshire

Part II - Particulars of decision

1. The Project for the purposes of this Scoping Opinion is defined in the EIA Scoping Report October 2023 – Final Draft 10.10.2023 (the Scoping Report).

- 2. The proposal is to install a Battery Energy Storage System (BESS) ("the development") as described at Part 3 of the Scoping Report.**
- 3. Pembrokeshire County Council Local Planning Authority (LPA) hereby gives notice in pursuance of the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) that the scope of the proposed Environmental Impact Assessment (EIA) as described in the Scoping Report is agreed subject to the matters contained in this Scoping Opinion.**
- 4. In adopting the Scoping Opinion, the LPA has taken into account those matters prescribed in Regulation 14(6), specifically the information provided by the applicant about the proposed development, the specific characteristics of the particular and type of development, and the environmental features likely to be significantly affected by the development. Consultation was undertaken in accordance with Regulation 14(4).**
- 5. This adopted Scoping Opinion should be read in conjunction with enclosed correspondence dated 7th December 2023 from Natural Resources Wales (NRW) and 17th November 2023 from Cadw (received in response to the statutory consultation required of Regulation 14(4)).**
- 6. In accordance with Regulation 14 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) an extension of time for the determination of the EIA Scoping Request was agreed until 5th January 2024.**

Scoped-In Matters

Ecology

7. Comments of the Council's Ecologist are enclosed. The cumulative effects with those developments referenced in this Scoping Opinion must be scoped-in.
8. Assessment must also include updated Chapter 6 of Planning Policy Wales - Addressing the Nature Emergency through the Planning System that was published October 2023.

Visual & Landscape Effects

9. Landscaping mitigation will be required in order to avoid significant effects, including from the Wales Coastal Path. Visual and landscape effects on the National Park must be fully assessed. The potential for any light pollution must also be considered.
10. The Scoping Report sets out an acceptable approach and standard working practices. However, only descriptions of where viewpoints are proposed have been provided (not a plan). On a minor point, in paragraph 8.4.6, LCTs are referenced but no explanation of what these are is provided.
11. The general landscape at this location is relatively open, more-so to the south east as the land rolls away in that direction, and slightly rises to the north and west. Views from the edge of the National Park of the development may be possible dependent upon final height of apparatus and final contours, but will be set in a strong context of other forms of energy development on both sides of the Haven. Confirmation of height of apparatus is not provided (just that shipping containers or similar will be involved) and it is not indicated whether the site will be re-profiled; both factors would affect visibility and therefore degree of impact. This

Information would be required for the Landscape Visual Impact Assessment (LVIA) as well as photo-montages from each of the viewpoints. There is unlikely to be significant landscape or visual effects from the cable run, other than localised and temporary effects.

12. Effects of the development, also combined with the other developments referenced in paragraphs 12 and 13, are likely to lead to a further fragmentation of the rural character of the land immediately south of the power station. A comprehensive assessment of cumulative effects that informs landscaping mitigation is required.

Cumulative effects

13. Schedule 3 of the EIA Regulations requires the consideration of potential cumulative environmental effects with other existing development and/or approved development. Table 5-4 provides a list of "Cumulative Schemes" to be considered as part of a cumulative assessment of environmental effects. The Green Hydrogen Project (No.5) is currently subject to a request for an EIA Scoping Opinion (LPA Ref.23/0795/SO). It is unclear as to the reference to "Intelligent alternatives" (No.6).

14. The following developments should also be included:

- Land to south of power station & cable route across Angle Peninsula (Erebus floating offshore wind). Cable and sub-station. Deemed planning permission approved. LPA Ref. 22/1148/NS.
- Land to south of power station & cable route across Angle Peninsula (Llyr floating offshore wind). LPA Ref.CO/0035/22.
- Pembroke Power Station. Proposed Synchronous Condenser. Permitted development. LPA Ref.23/0349/PN.

It is noted that paragraph 5.2.23 of the Scoping Report indicates that “an update for as-yet unidentified projects will be undertaken during the preparation of the ES”.

Decommissioning

15. The development is to be time limited for a period of 40 years. The potential environmental effects during the decommissioning phase is not a matter that is sufficiently addressed in the Scoping Report. Potential significant environmental effects cannot be discounted including in respect of the disposal (or otherwise) of batteries.

Scoped-Out Matters

16. It is noted that at paragraph 9.1.1 of the Scoping Report that those matters proposed to be “scoped-out” will still be addressed through the EIA either “in the form of the front end chapters or within topic assessments”.
17. In respect of archaeology, refer to email dated 7th December 2023 when it was confirmed that the Council’s advisors, Dyfed Archaeological Trust (DAT (now Heneb)), commented regarding the draft Heritage Statement prepared by Savills Heritage and Townscape – DAT is “satisfied that the historic environment has been adequately addressed as part of the pre-application consultation and there should be no requirement for it to also be included in the EIA”.
18. The potential impact on designated historic assets are to be appropriately addressed outwith the EIA as there are unlikely to be significant environmental effects in this respect.
19. The Scoping Report notes that a Transport Assessment would be included in any planning application and that this would include a

**Construction Environmental Management Plan (CEMP) and
Construction Transport Management Plan (CTMP).**

20. It is noted (at paragraph 6.3.1 of the Scoping Report) that the main part of the site is classified as Grade 2 (good quality) and 3b (moderate quality) according to the Agricultural Land Classification (ALC) Map for Wales. Any planning application should consider national planning policy in this respect.

21. This Scoping Opinion is not determinative and can only be taken in the light of information and conditions available at this time. Should there be any proposed changes to the development that departs from the submitted Scoping Report and/or those developments to be considered as part of the cumulative assessment, the LPA should be asked whether an updated Scoping Opinion request should be submitted.

Decision Date: 4th January 2024



**David Popplewell
Chief Planning Officer (Development Management)
Pembrokeshire County Council**