

Developments of National Significance  
Planning Inspectorate  
Welsh Government  
Crown Building  
Cathays Park  
Cardiff  
CF10 3NQ

11 June 2018

Dear Sirs,

## EIA Screening Request for a small-scale gas fired STOR development on land to the North West of Coity Road, Bridgend, CF31 1NW

UK Power Reserve is undertaking a screening study and request an EIA Screening Opinion from The Planning Inspectorate in respect of the above proposed development on land to the North West of Coity Road, Bridgend, CF31 1NW. The Proposed Development is for more than 10MW and therefore, in accordance with Town and Country Planning (The Developments of National Significance) (Wales) Regulations 2016, it is considered to be a Development of National Significance and therefore would be determined by Welsh Government.

This request is being made under Regulation 31 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

The Proposed Development is within Schedule 2, Part 3a:

*"Industrial installations for the production of electricity, steam and hot water:*

*The area of the development exceeds 0.5 hectare"*

The Proposed Development is not in a 'sensitive area' as defined in section 2(1) in Part II of the 2016 Regulations Furthermore, the Proposed Development would have a site area of 0.37ha and therefore falls below the threshold set in Schedule 2 of the Regulations:

*"Industrial installations for the production of electricity, steam and hot water:*

*The area of the development exceeds 0.5 hectare"*

Following pre-application discussion, it is concluded that an EIA Screening Opinion is therefore required.

### Description of the Proposal

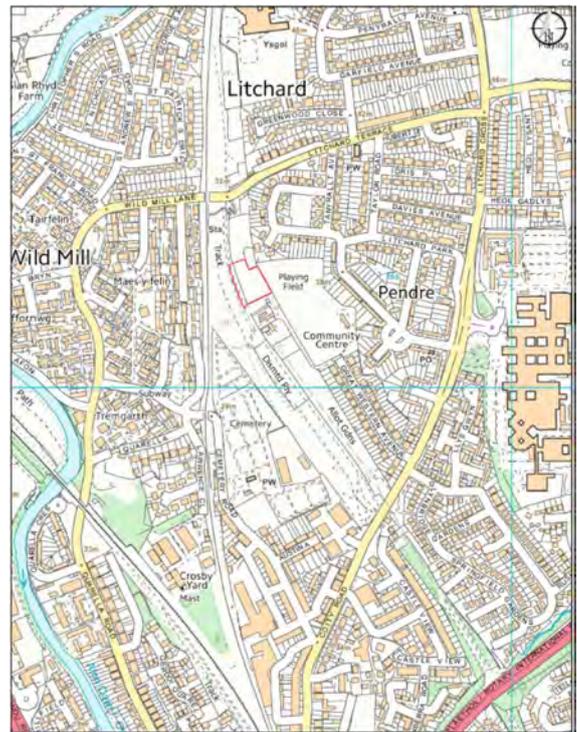
The Proposed Development will consist of a maximum of 14 generators, each in their own soundproofed engines cell together with the ancillary infrastructure including transformers, DNO substation, gas kiosk, HV/LV switch room, store room, control room and lubrication oil tanks. The layout is shown in the accompanying Site Plan Ref: 18031.102: Rev 2, and Elevation Drawing Ref: 18031.103: Rev 1a.

At this time, a final selection of the generators has not been made for commercial reasons although it is known that the output will be 20MW. The Proposed Development will consist of a maximum of 14 generators.

These generators will be mains gas-fired reciprocal engines. In preparing the environmental assessments a 'worst-case' scenario has been modelled and it is known that impacts, whichever generator is selected, will not exceed those stated in the conclusions of the noise, air quality, ecology and visual environmental assessments.

## Location of the Development

The Proposed Development Site, known as Coity Sidings, is a large area of previously-developed land within the urban area of Bridgend. The Dainton Group own land that stretches between Coity Road to the south and Litchfield Terrace to the north – the distance from north to south is around 660m. The Proposed Development Site is situated to the north of an electricity substation, adjacent to the eastern boundary of Dainton's landholding. At the southern end of the Sidings site, Dainton operate a storage business; a builder's merchant is located in the south-west of the land. The remainder of the site is brownfield land that has become overgrown and through which an unauthorised footpath runs leading through to Litchfield Terrace. It should be noted that this path is not identified on the Definitive Map and is not a Public Right of Way.



## Rationale for the Development

The purpose of the Proposed Development will be to contribute to a national programme to fulfil demand for energy during peak electricity periods known as the Capacity Market. This Proposed Development will also provide local energy security as, unlike national energy generation, it will feed electricity into the local electricity network at the point of need thereby ensuring that the lights stay on for local residents and businesses. This site benefits from a current grid connection offer from Western Power Distribution and a firm offer to connect to the mains gas network.

## Planning History

The land is historically known as Coity Sidings. Historic mapping shows that the sidings were dismantled at sometime around 1987-1991. It should be noted that Ogwr Borough Council's Greater Bridgend Local Plan (adopted 1984) allocated Coity Sidings "primarily for light industrial and warehousing uses". Although no map from this plan is available, the plan noted that the site was undeveloped at the present time. In the 1980s various consents were granted for temporary uses and for a new access (from the A4061). This history suggests, at the very least, that the railway use of the land was ceasing. This notwithstanding, a Planning Brief prepared by Asbri Planning in 2011 stated that the railway yard was cleared in the 1990s.

It should also be noted that the Ogwr Borough Local Plan (adopted 1995) allocated the Coity Sidings land for a variety of uses (amenity space on the northern part of the site, B1/B2 and B8 uses on the remainder, a community route along the eastern boundary and a new railway station at Wildmill).

A Planning Brief (adopted in 1998) set out further uses for the site, including retail and service uses at the southern end, employment uses in the central area, housing to the north of Lichfield Terrace, amenity space between Lichfield Terrace and the employment land, and a community route running north-south through the site.

The site continued as an allocation in the subsequent Unitary Development Plan (adopted 2005) and into the extant Local Development Plan (adopted 2012).

A full planning application (LPA reference: P/15/279/FUL) was submitted to the council on 28 April 2015 for the development of a small-scale standby electricity generation facility.

On 2 July 2015 correspondence was received from the council's case officer, which noted an objection had been received from the council's planning policy department. In light of this response, the case officer confirmed that the application would be written up for refusal and subsequently determined under delegated powers.

This application was refused on 17 July 2015 for the following reason:

*"The site is allocated in the adopted Local Development Plan for regeneration and mixed-use schemes comprising predominantly residential development (Policy COM1(4)) with some employment (Policy REG1(3)) and a Park and Ride Facility to serve Wildmill Train Station (Policy PLA7(21)). The development which comprises of an infrastructure project will be prejudicial to the future development of the site and the wider regeneration of Bridgend, contrary to the aims of the adopted Local Development Plan."*

This decision was appealed in October 2015 (reference APP/F6915/A/15/3136250) and the Inspector concluded in her decision:

*"In reaching my decision I have had regard to all the matters raised in support of the scheme including the benefits to the national and local economy through the provision of back up electricity and assist in transition to a low carbon economy. However, none of these factors are sufficient to alter my overall conclusions. Whilst I consider that the proposal would not have an adverse effect on the provision employment land, this does not outweigh my concerns regarding the effect of the proposed development on the development of the Coity Sidings site for residential purposes, the park and ride facilities at Windmill Railway Station and delivery of wider regeneration objectives in the Bridgend area."*

At the time it was identified that the Local Plan allocated the site for a mixture of uses including 140 houses and approximately 2.5ha for employment use. In the Joint Housing Land Availability Study (JHLAS) 2015 the Coity Sidings site was allocated for 80 houses following a recommendation by an Inspector. In the 2016 and 2017 JHLAS this has gone back up to 140 houses. At this time, the landowner secured planning consent for self-storage as the employment use. The Proposed Development subject of this application would not impact on the number of people employed at the self-storage facility.

Since this application two years ago there has still been no interest from any housebuilder to develop the site in accord with the Local Plan allocation. It should be noted that the site has remained vacant throughout the lifetime of the Local Plan. The 2017 JHLAS identifies a 4-year supply of housing land and the Local Plan has a maximum of 4 years before being replaced. This would provide an opportunity to seek more deliverable housing sites that appeal to the market.

The application has been considered by both Bridgend County Borough Council and the Planning Inspectorate for Wales and neither considered that the Proposed Development was an EIA Development.

## Potential Environmental Issues

**Local Plan:** National plan policy supports renewable energy and low carbon development and the need for the planning process to support embedded or distributed energy generation. The proposed development site is allocated as mixed-use development within the Local Plan. Currently the site is occupied by a self-storage company and the remainder is vacant. The LPA would like to see the rest of the site used for housing. There has been no interest from housebuilders since the site was allocated nor has there been any progress in developing the park and ride facility.

**Noise:** A noise impact assessment was prepared in March 2015. Given that the technology is broadly the same it is concluded that a revised noise impact assessment would come to, broadly, the same conclusion. In summary, the 2015 NIA concluded noise levels at the nearest residences will be below the BS4142 and WHO criteria for sleep disturbance. Therefore, it can be concluded that the proposed plant is unlikely to give rise to disturbance, should it be required to operate at night. Noise levels at industrial receptors are within the recommended good noise criteria within BS8233. Noise levels at the cricket wicket are within the recommended criteria within BB93 on the teaching of outdoor sport. This would include a 4.5m acoustic wooden fence along the northern and eastern boundaries.

It is therefore concluded that there would be no significant adverse noise impacts.

**Air Quality:** An air quality assessment has been completed. In summary this concluded:

- The numbers of vehicles associated with construction are not predicted to be significant in terms of total emissions or construction duration. Similarly, operational traffic flows are expected to be insignificant compared with baseline flows and have been screened out of the assessment.
- All impacts, human and ecological, are predicted to be below limit values at locations where the Air Quality Directive states that they must be applied.

It is therefore concluded that there would be no significant adverse air quality impacts.

**Biodiversity:** A Preliminary Ecological Appraisal has been undertaken in March 2015 and would be reviewed and updated to reflect the current situation. This would include assessment to review the ecological value of the Proposed Development Site. In summary, there are no statutory designed sites within the 1km area, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and RAMSAR sites. The assessment would follow the standardised Joint Nature Conservation Committee Phase 1 habitat classification and mapping methodology (JNCC, 2010) was used. Dominant plant species would be observed and recorded in each habitat. The plant species nomenclature follows that of Stace (2010).

It is therefore concluded that there would be no significant adverse biodiversity impacts.

**Heritage:** A Heritage Constraints Appraisal has been prepared in February 2015. In summary this appraisal concludes given the industrial development on the site since 1920's the likelihood of the Proposed Development disturbing archaeological remains or artefacts on this site is very low. There are no other significant heritage assets on or near the Proposed Development Site that would result in a recommendation for further desk-based study.

It is therefore concluded that there would be no significant adverse heritage impacts.

**Contaminated Land:** A Ground Contamination Risk Assessment was prepared in February 2015. In summary this report concludes the Proposed Development would utilise hardstanding and would be a low sensitivity commercial use. Risk to end users and surface water is therefore dismissed as there would be no viable pollutant linkage. In the unlikely event that unforeseen contamination is encountered during construction works removal of the material would lead to environmental betterment.

It is therefore concluded that there would be no significant adverse contaminated land impacts.

**Landscape and Visual:** A proposal of this nature and size is always likely to result in visual impacts arising from the introduction of a new feature in the landscape. However, it should be seen in the context of the numerous overhead lines which traverse the site in order to transmit power to and from the sub-station which is located approximately 100m south east of the site. Furthermore, the to the south of the site is a self-storage container business. The maximum height of the Proposed Development would be 8m.

Due to the small nature of the proposed development it is felt that this would still be the case and that this proposed development would not lead to a significant adverse impact.

The proposed development subject of this screening request covers a site area of 0.37ha and the majority of the proposed development would be 6m in height. The tallest pieces of equipment on the site are the stacks which are located on top of each generator. These would have a maximum height of 8m from the ground. It is therefore concluded that the Proposed Development would not have a significantly adverse impact in relation to landscape and visual impacts.

**Transport:** The proposed development would operate on an unmanned basis with a single weekly visit from a Field Service Engineer. The fuel supply would be via a dedicated gas main to remove the need for fuel delivery and storage. Therefore, the only transport impact would be during construction.

The construction period is expected to last up to 14-weeks and consist of 4 tasks; ground works, infrastructure installation, equipment installation and testing and commissioning. During this time, there will be in the order of 28 large vehicle trips (listed red in the table), equating to 56 movements (i.e. to and from the site). In addition, there will be a number of light goods vehicle (i.e. cars and vans) movements during this period.

Activity	Programme (in weeks)													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Ground Works	4	4	4		4	4								
Infrastructure					5 + 5	5 + 5	5							
Equipment							4	4	4	2				
Testing and commissioning											2	2	2	
General	10	10	10	10	10	10	10	10	10	10	10	10	10	10

The installation of the generating equipment will be enabled by crane and other specialist equipment and this process is anticipated to take four months. It will be undertaken by expert contractors approved by UKPR.

All construction vehicles will be able to enter and exit the site using of forward gears. Scheduling of deliveries will ensure that no vehicles will be required to park on the public highway. The proposed development site has existing access roads to enable safe movement of HGVs and other vehicles. It is therefore concluded that there would be no significant impact in relation to traffic and transport.

## Supporting Information

It is intended that any subsequent planning application would be accompanied by the following supplementary reports:

- Supporting Statement which explains the need for the development, the design and appearance of the component parts and a summary of the environmental reports;
- Planning Statement which demonstrates that the proposed development conforms with both national and local planning policies and other material considerations;
- Consideration of local ecological assets;
- Consideration of amenity in relation to design and appearance;
- Consideration of amenity in relation to noise;
- Consideration of amenity in relation to air quality; and
- Any further assessments identified by the Local Planning Authority.

It is our view that the above covers the most likely environmental considerations of the proposed development and that all the potential impacts would be addressed in the supplementary information.

## EIA Regulation Consideration

The proposed development is of a type listed in Schedule 2 of the EIA Regulations and therefore requires to be screened to establish whether or not it constitutes EIA Development. The screening study has identified a number of potential environmental issues. Having undertaken an initial review of the proposed site and surroundings, including consideration of cumulative issues, it is considered that there would be no significant impacts as a result of the proposed development and therefore, in our opinion, is not an EIA Development.

I would be grateful if you could provide a Screening Opinion at your earliest convenience. Should you require any additional information, please do not hesitate to contact the undersigned.

If you have any questions or require any additional information, please do not hesitate to contact me or my planning manager, Clive Fagg, on 07471 037 484 or email [clive.fagg@ukpowerreserve.com](mailto:clive.fagg@ukpowerreserve.com) at the earliest opportunity.

Yours sincerely



Ms Keila Abreu  
Senior Manager – Project Development  
**UK Energy Reserve Limited**

Enc. Site Location Plan (ref: 18031.101 v2)  
Site Layout Plan (ref: 18031.102 v2)  
Elevation and Block Plan (ref: 18031.103 v1a)