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Wales

Mr. Rob Sparey,  
Planning and Environment manager,  
Planning Inspectorate,  
Crown Buildings,  
Cathays Park,  
Cardiff,  
CF10 3NQ.

**Our ref:** CAS-21814 –X5L2  
**PINs ref:** 3155507  
**Date:** 12 August 2016

Annwyl/Dear Mr. Sparey,

**Re. Town and County Planning Act 1990.  
The Developments of National Significance (Procedure)(Wales) Order 2016.  
Town and Country Planning (Environmental Impact Assessment) (Wales)  
Regulations 2016.  
Site; Land to the north of Felindre Road, Pencoed, CF35 5HU.  
Proposal; Temporary Installation of a Short Term Operational Reserve (STOR)  
circa 40MW.**

Thank you for your email dated 28 July 2016 with enclosures and we have taken the liberty of copying further details regarding the proposals directly from the Planning Inspectorate Wales website. (Ref; 3155507).

We note that you are seeking our comments to assist you to identify the associated environmental issues and adopt a screening opinion under the Town and Country (Environmental Impact Assessment) (Wales) Regulations 2016.

The decision as to whether an Environmental Impact Assessment (EIA) is required is naturally a matter for you to determine but you have sought our views on whether the proposed development is likely to have any significant environmental effects.

We have reviewed the available limited and inadequate information in respect of the proposals and find it difficult to fully respond on the question of the project giving rise to likely significant effects. Our remit includes such material factors as flood risk/drainage, pollution prevention, Air quality, ecology and landscape which require careful

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

assessment when consulted on any subsequent scoping opinion or planning application. Alternatively, if you decide that an EIA is not required, the applicant can contact Natural Resources Wales (NRW) for pre-application advice.

In an effort to assist you as much as possible we have identified below our key potential environmental considerations in respect of this proposed development based upon very limited detail.

### **Key potential environmental considerations.**

#### **Flood Risk.**

Elements of the proposed development lie partially within Zone C2 as advocated by the Development Advice Maps linked to Technical Advice Note 15 Development and Flood Risk.

The areas are;

- That southern part of the access road/track that adjoins the Felindre Road.
- The south east corner of the proposed development site which forms part of the "Energy generation area" which may include several generators as marked on site location plan.

#### **Pollution prevention.**

The proposed development lies within 90 metres of a Source protection Zone and 150metres from the Ewenni Fach main river. It also adjoins a local cemetery.

It is essential that a potential polluting development of this nature should include robust measures to mitigate all risks. The developer should identify all the potential pollutant linkages and apply suitable mitigation measures using the best available techniques.

Any mitigation measures must be implemented in both construction; operation and decommissioning of the proposed site and its access.

We note that all hard standings around the generators and fuel storage areas would be constructed of a non-permeable material and welcome the further submissions of "*a prevention of spillage strategy and surface water details*" by the developer.

#### **Air Quality/Emissions & relationship with local ecology.**

In respect of the emissions and possible impact on air quality and impact on Natura 2000 sites and other designated habitats in the vicinity, there is insufficient information to have any views of the significance of the emissions

It is essential that an Air Quality report must be provided for this proposed development and clearly at this stage we are not able to comment any further on this matter.

#### **Ecology.**

We refer above to the question of air quality and emissions on local ecology. Our records indicate that with 3KM of the site there are areas of protected sites and this aspect has not been addressed.

## **Landscape.**

We have no record of any special landscape status for the site of the proposed development but we refer to the local Authority landscape officer for advice upon any landscaping scheme to screen of the site.

## **Permitting.**

We note that the proposed development intends to comprise of the following key elements;

- 20 x 2 MW dual fuel generators
- 6 x storage tanks
- 1 x transformer
- Access hard standing

Armed with very limited information we make the following comments;

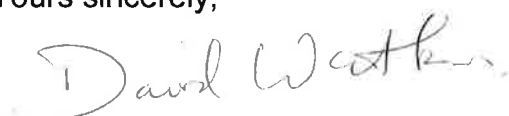
- There appears to be inconsistency as to which engine they propose. The emissions information "Redditch" appears to relate to a G63 units where as the date sheet provided was for the more powerful G83 unit.
- Both these engines are diesel engines with no reference to dual fuel.
- From the information there is intended to be 20 units and for the purposes of The Environmental Permitting (England and Wales) Regulations 2010 (EPR 2010) (as amended) the aggregated capacity would be > 50 MWth and would therefore would require a permit from NRW before the plant could operate.
- We estimate that each engine would have a thermal capacity of 4 MWth and therefore would be subject to the requirements of the Medium combustion plant directive (MCPD).
- Based on the data provided there would potentially be a need for abatement or other emissions reduction techniques to be fitted to meet the requirements of the MCPD, including monitoring requirements.
- With regards to the emissions and possible impact on air quality and impact on Natura 2000 sites and other designated habitats in the vicinity, there is insufficient information so as to have any views of the significance of the emissions.
- We would be undertaking a full assessment of the environmental consequences of the proposal when we determine the EPR permit for the operation of the installation.

## **Advice for applicant.**

There are new oil storage regulations for Wales;  
The Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.

We hope the above information is useful for your purposes.

Yours sincerely,



**Mr. David Watkins**  
**Senior Development Planning Advisor**

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