

REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT

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**SUBJECT:**

**ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT – PROPOSED  
COMBINED HEAT AND POWER PLANT, SOUTH HOOK LNG, HERBRANDSTON**

Purpose of Report

The above scoping report was received on 27<sup>th</sup> June 2012. The purpose of this report is to inform members of the response given for information only.

Background

Qatar Petroleum International Ltd, Exxonmobil Power Ltd and Total Gas & Power Ventures intend to submit an application to the National Infrastructure Department (NID) at the Planning Inspectorate next year for a Combined Heat and Power Plant (CHP plant) at South Hook LNG, Herbrandston. The plant will be located on land immediately adjacent to and within the perimeter of the South Hook LNG terminal and two alternative locations are being considered for the plant; one within the National Park boundary and one outside. The detailed design of the CHP plant has yet to be decided, but the main buildings and structures forming the plant are power generation buildings, heat recovery steam generator, control/administration/workshop building, HV switchgear indoor gas insulated substation building, cooling tower block/fin/fan coolers, raw water storage tank, demineralised water storage tank and a stack.

The development zone would occupy some 10 hectares and the carbon capture and storage facility some 4 hectares. The tallest buildings would have maximum heights of 40 metres (heat recovery steam generator building) and a stack height of a maximum of 85 metres, with this being up to 8 metres in diameter. The plant would be linked to the existing LNG facility but would also be capable of operating as a stand alone facility. The proposal does not include any associated development (ie connections to the Pembroke Power Plant) and which would form a further and future submission.

Prior to the submission of the formal application for a Development Consent Order, a number of initial meetings, discussions and formal pre-application submissions will be made to the local authorities and consultees who are involved in providing responses to the NID at formal stages of the process. These will be the subject of further reports to members for information. An initial consultation has been submitted in respect of the scoping of an Environmental Impact Assessment (EIA) which will accompany the application for the Development Consent Order. A scoping report sets out the intended content and scope of the EIA and resulting Environmental Statement.

There is no formal requirement to seek a scoping opinion although it is accepted as best practice. The scoping report can be found through the link <http://infrastructure.planningportal.gov.uk/SouthHook-Scopingreport.pdf> or as a hard copy at Llanion Park.

### Main Comments

The response to the scoping report can be found at Appendix A to this report. The main issues raised relate to the difficulties of providing a scoping opinion on alternative locations, particularly as there is no decision as to whether the location will be within the National Park. In addition, in the absence of any associated development within the proposals there is no ability to scope the implications arising from possible overhead/underground infrastructure through the National Park. Little reference is made in the document in relation to the National Park's purposes and the EIA will need to make reference to this. Furthermore, should the final siting be within the National Park full justification for this approach will be required with regard to the major development test which requires major developments within National Parks to only be allowed in the national interest.

Further specific comments are raised with regard to biodiversity and landscape matters particularly, but with general agreement to the approach to the EIA and the theoretical zone of visibility illustrated.

### Recommendation

That members note the response to the scoping document.

### Background Papers

<http://infrastructure.planningportal.gov.uk/SouthHook-Scopingreport.pdf>

*(For further information please contact Vicki Hirst, Head of Development Management)*

**APPENDIX A – RESPONSE TO SCOPING REPORT**  
**PROPOSED COMBINED HEAT & POWER PLANT, SOUTH HOOK LNG,**  
**HERBRANDSTON**

**Re: Proposed South Hook Combined Heat and Power Plant**  
**By Qatar Petroleum International Ltd, Exxonmobil Power Ltd & Total Gas & Power Ventures**  
**Infrastructure Planning (Environmental Impact Assessment) Regulations 2009**  
**SI 2263 (as amended) (the EIA Regulations)**

I refer to your consultation in respect of a request for a scoping opinion regarding the above matter and am writing to confirm the Authority's view in respect of the submission.

The approach to the EIA set out in the scoping report is generally supported and is a methodical and logical approach to the assessment. It is also considered that the key issues arising from the project are highlighted. However, there are a number of general and specific comments that the Pembrokeshire Coast National Park Authority (PCNPA) wish to raise and these are set out below.

**General Comments**

It is noted from the submitted scoping report that the final location of the proposed combined heat and power plant (CHP plant) has yet to be decided and could be positioned either within or outside the Pembrokeshire Coast National Park boundary. This has made scoping the EIA difficult as different issues arise dependent on the final location. As such, the comments made are based on the precautionary principle and a number relate to the assumption that the CHP plant will be located within the National Park.

In the case of the CHP plant being within the National Park, the EIA will need to provide a full justification for this with regard to the requirement for any major developments located within a National Park to be in the "national interest". No information is provided in the scoping report in this regard and this would be essential should the final location be within the National Park to meet the well established "Silkin" (major development) test. Whilst it is accepted that the CHP plant is intended to work in conjunction with the existing LNG plant, the scoping report also confirms that the CHP plant will be capable of separate operation as a stand alone project. In this scenario, the project will require robust justification under the major development test.

Should the CHP plant be situated within the National Park not only would the above major development test need to be applied to the project, but also the justification for the plant being situated within the National Park with regard to reasons that would preclude it from being situated outside the boundary. The scoping report makes no reference to the National Park's purposes and duties as set out in the Environment Act 1995 and these should be an integral part of the EIA.

In addition to the above, it is noted that the scoping report does not include the associated development proposals, namely the connection to the substation at Pembroke Dock. These works could have a significant effect on the National Park depending on the options chosen to make the connection and it is highly regrettable that these works are not included in the proposals to enable the whole project to be considered in a holistic manner. The PCNPA would strongly encourage the inclusion of this work within the EIA and overall submission.

It is also considered that the report lacks clarity on the relationship between the EIA process and the Habitats Regulations Assessment (HRA) process (it is understood that the two are independent of each other although information gathered for the EIA can/should also be used to inform the HRA). It would be useful to include an explanatory note that sets the relationship between the EIA and HRA out more clearly in the scoping report.

### Specific Comments

- Page 9, section 2.14/Page 29, section 4.21: The National Park's purposes should be included.
- Page 10: the list of features of European interest of the Pembrokeshire Marine SAC is incomplete (the habitat feature: submerged or partially submerged sea caves and two species features: shads and shore dock are not listed). For the sake of accuracy and clarity of presentation, it is suggested that the full list be given.
- Page 11, section 2.16: although it is not intended to (or indeed is necessary) to provide a detailed account of the nature conservation interest of the area included in the S. 106 Agreement (the "Conservation Area"), it would be worth noting here that the site is very good for terrestrial as well as freshwater invertebrates and that it is a foraging area used by bats that roost in the fortifications (this provides a better overview of the use made of the site by European Protected Species). The second sentence in this paragraph could be tightened up by placing a full stop after "...nature conservation" and deleting the rest of that sentence (habitat management is carried out for the purpose of nature conservation). Although the Conservation Area does not have a formal/statutory nature conservation designation, its importance as a biodiversity hot-spot in this part of the National Park should not be underestimated;
- Page 12, section 2.22: Landscapes of Outstanding Historic Interest are "registered" not "designated".
- Page 24, section 3.59: details of proposals for contractor's accommodation should be included and a Contractor's Travel Plan will also be required.
- Page 36, section 5.1: The main environmental topics listed are concurred with. However, it is considered that considerations in relation to safety, land contamination and lighting should also be included as topics (or heavily referenced throughout other topic areas).

- Page 56, section 5.86: just to re-iterate that although the area included within the S. 106 Agreement is not within an SSSI, it is a very important local biodiversity hot-spot that supports European Protected Species amongst many others. It is potentially a very sensitive receptor (e.g. to impacts that could arise from noise; light pollution and changes in air quality) and its inclusion as a discrete area in the assessment is appropriate and important;
- Page 56, section 5.87: correction... **greater** horseshoe bats (the outer fortifications are very important winter roosts (*hibernacula*) for this species and the significantly large numbers of greater horseshoe bats that use the site are considered to be part of a meta-population that is also one of the SAC features for the Pembrokeshire Bat Sites & Bosherton Lakes SAC: it is noted that any effects of the proposed development at South Hook on the greater horseshoe bats roosting in the fortifications and foraging e.g. over the S. 106 area may have implications for the SAC population). Other species of bats including lesser horseshoes have been recorded roosting in the fortifications. It is also worth noting that otters have been recorded within the green fence area on the existing operational site (caught on CCTV !) and that it is possible/quite likely that they venture from time to time into the S. 106 Conservation Area (it is also highly likely that otters using this area are part of the population that is a feature of the marine SAC);
- Page 56, section 5.88 *et seq.*: just to note that it is not always clear in the sections that follow exactly which areas will be subject to surveys (it is assumed that the S. 106 Conservation Area will be included);
- Page 56, section 5.91: it is noted that there will be consultation with PCNPA; CCW etc (as noted in 5.88): at what stage in the process? (the reason for asking this question in the context of this section is that careful consideration will be required as to the timing and methodology of bat surveys, to reflect e.g. the importance of the S. 106 Conservation Area in the winter, spring and autumn);
- Page 72, sections 5.161 – 5.165: There should be reference to the National Park designation in this section.
- Page 75, section 5.175: The candidate viewpoints listed are agreed with in principle; however further discussion as suggested would be welcomed once the final location of the plant is determined. The visual assessment of any associated development would also be strongly encouraged as referred to in the General Section above.
- Page 77, section 5.178: The disposal location of any excess soils (either on or off site) should be included in the EIA.
- Page 81, section 5.206: As stated above this section should include proposals for contractor's accommodation and contractor's travel plan.
- A careful check should be made to ensure that **all** the potentially sensitive environmental receptors have been identified and that they will be adequately considered as part of the EIA process (the geographical scope of the EIA may need to be broadened e.g. to ensure that any potential impacts arising from changes in air quality on more distant receptors are fully assessed as appropriate).

The above sets out the PCNPA's view of the scoping report and I look forward to receiving the formal pre-application consultation in due course. If you require any clarification of any points raised in the meantime do not hesitate to contact me.

Yours sincerely

**Vicki Hirst**  
**Head of Development Management**