

APPENDIX C

Ref: Consultation/CHP-SHLNG/VH
Your Ref: EN010054

FAO Mr J Green
Examining Authority
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol
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20th November 2013

Dear Mr Green

Re: Proposed South Hook CHP Plant, Herbrandston – Written Representation

I refer to the above Nationally Significant Infrastructure Project currently under examination and your request for the submission of written representations.

The Pembrokeshire Coast National Park Authority is relevant authority for the purposes of the Planning Act 2008 and the Authority's Local Impact Report (LIR) in relation to the project has been sent to you under separate cover today.

The application was discussed at the Authority's Development Management Committee meeting today and it was resolved that a written representation should be forwarded in addition to the Authority's LIR. The reason for this is to enable a view to be given by the Authority of the overall acceptability of the proposal having considered and balanced all of the local impacts identified in the LIR.

The conclusions reached in the LIR in respect of each impact can be summarised as:

1. There is insufficient information on how the proposal complies with national planning policy and the major development test to justify siting the development in a National Park.

2. There are likely to be major negative impacts to the National Park landscape arising from the development which cannot be fully mitigated through the design principles and the development will therefore conflict with the primary purpose of the National Park designation.

3. That the impacts on terrestrial ecology cannot be assessed due to a lack of information in relation to surveys and the associated mitigation to address the use of the site by protected species.

4. That the possible impacts to interests of cultural heritage can be appropriately mitigated for through requirements (i.e. "planning conditions") in the DCO to carry out a written scheme of investigation and for the development to comply with the identified design principles.

5. That there will be minor positive impacts to employment arising from the development but moderate negative impacts to the affordable housing stock during construction period estimates at 26 – 30 months. This negative impact could be mitigated for through the requirement for the applicant to enter into a development consent obligation to provide contractors housing which will become affordable housing on completion of the scheme and which would result in a moderate positive impact in the longer term.

6. That there will be minor negative impacts to transportation during construction, and neutral impacts once operational. The negative impacts can be mitigated for through the applicant entering into a development consent obligation to secure road improvements in the area.

7. That there will be minor to moderate negative impacts with regard to noise and disturbance during construction but neutral effects on noise, disturbance, air quality and contaminated land once operational

8. That a lack of information in relation to the connection to the grid and the details of the development in the carbon capture area make it difficult to fully assess the impacts of the cumulative developments.

Having given due consideration to those impacts and with regard to consideration of their relative weights in relation to national and local policy, it is the PCNPA's view that the principle of the development to be sited within the National Park has not been robustly justified through the application of the test for establishing of there are exceptional circumstances that would allow consent to be given within nationally designated landscapes in Overarching National Policy statement for Energy EN – 1 or the major development test as set out in Planning Policy Wales. In the absence of such a justification it is concluded that the primary purpose of the National Park Authority to conserve and enhance its natural beauty, wildlife and cultural heritage should be given precedence and the application be refused due to the major negative impact that would arise from this development on these interests of acknowledged importance and in conflict with the Authority's

adopted planning policy contained in its Local Development Plan adopted in 2010.

However, should a convincing and robust case emerge during the examination justifying the siting of the development within the National Park in terms of national need and with regard to the policy tests referred to, the negative impacts arising from the development should be weighed against the following matters:

1. The utilisation of brownfield land, already identified for future expansion to the existing LNG terminal.
2. The benefits to the social and economic well being of the National Park communities.
3. The location within the recently designated Enterprise Zone, and
4. The prospect of a more sustainable solution to electricity generation supply than more traditional forms of fossil fuel power station.

Taken together these aspects are considered to make the case for allowing the development of the CHP plant, *but only if the principle relating to national need is made through meeting the relevant policy tests.*

This view is also predicated on appropriate mitigation being put in place to minimise the negative impacts, namely those:

1. Requiring the detailed development to conform with the design principles and landscaping to mitigate for the visual impact particularly from longer distance views.
2. The requirement to secure appropriate mitigation in respect of protected species (and following positive conclusions arising from an Appropriate Assessment).
3. A requirement for affordable housing to be provided and for contributions to infrastructure improvements to be made and secured through development consent obligations.

The acceptability of the proposal if it is to proceed will also depend upon requirements of the DCO to secure these aims and the Authority's views on the provisions of the Draft DCO and the planning requirements proposed are set out in the LIR.

The authority requests that these views are taken into account in your examination of the application.

Yours sincerely

Vicki Hirst

Head of Development Management

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