

Appendix E – July 2020

Annex to RWE Report ref. ENV/649/2019:

RWE Generation UK plc

Proposed Emergency Back-up Generating Plant, Pembroke

Air quality impact assessment.

Introduction

Following submission of this report and prior to acceptance of the application to vary the permit as being duly made, NRW raised a number of air quality-related issues requiring a response. Some of these were matters of clarity, which have been addressed in a letter dealing with a wider range of issues; others are dealt with in this Annex and listed below.

Issues raised by NRW

- a) There are Ancient Woodlands within screening distance that have not been considered in the Air Quality assessment. Please provide details on the impacts the proposed activity will have on these sites/ update the Air Quality assessment as necessary.
- b) The Gweunydd Somerton Meadows SSSI appears to be within 2km of the proposed activity but hasn't been assessed in the Air Quality assessment. Please provide details on the impacts the proposed activity will have on this site.
- c) There are several sites such as Pembrokeshire Bat Sites and Bosherton Lakes SAC that are not assessed within the Air Quality assessment. There is reference to them being screened out in the document 'Response to Queries about Potential Effects on Special Areas of Conservation' but could not see detailed information on why some sites have not been looked at further. Please provide further information.

Response

Regarding the above comments, we would firstly highlight the low capacity of the EGBP and its extremely low operating hours, especially in comparison with the existing station. This suggests a low likelihood of significant effects from associated air impacts, as is demonstrated for the sites included in the submitted report. Specific responses are as follows:

There are sites of ancient woodland located within the customary 2km air impact screening distance, the closest being to the north of the proposed EGBP location on the edge of the Pembrokeshire Marine SAC, as shown in Figures 4-6.

The registered national grid reference for Gweunydd Somerton Meadows SSSI is 193198,200279, which is more than 2km from the proposed EGBP location. On closer inspection it can be seen that a small section (~180m long) of the SSSI lies to the north of this reference location and so is within the customary 2km air impact screening distance.

There are three Natura 2000 sites listed in Table 2 and Figure 6, where an explicit impact assessment is not included. These are listed below with the distance from the closest point to the proposed EGBP:

Castlemartin Coast SPA. 3.7km

Limestone Coast of South West Wales SAC. 3.6km

Pembrokeshire Bat Sites and Bosherton Lakes SAC. 7.2km

Inspecting Figures 5 and 6 in the report demonstrates that maximum short and long term NO_x impacts from the EBGp are focused in a small area within the Pembroke station site boundary. In fact impacts at any location beyond the site boundary are below the relevant 'no likely significant effect' screening criteria (10% of short term and 1% of long term critical level). So impacts from the EBGp at all the sites mentioned above will be well below these screening criteria and so there will be no likely significant effect from ambient NO_x. Nutrient nitrogen and acid deposition will be correspondingly low and will therefore have no likely significant effect. This is demonstrated in detail for the Pembrokeshire Marine SAC, which is much closer to the proposed EBGp location than the additional Natura 2000 sites or the Gweunydd Somerton Meadows SSSI.

For all the above sites, issues relating to cumulative impacts linked to the Pembroke main station emissions, other existing background and possible new sources are the same as those discussed in the report and do not change the conclusions of no likely significant effect.