



Ref: C025-01

The Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

4th September 2020

VIA DROPBOX

Dear Sirs

Town and Country Planning Act 1990
The Developments of National Significance (Wales) Regulations 2016
Application by: Môr Hafren Bio Power Limited
Site Address: Land off Newlands Road, Cardiff CF3 2EU

This covering letter accompanies Môr Hafren Bio Power's formal planning application for the following proposed development.

Proposed construction and operation of an Energy Recovery Facility, including the formation of a new access on to Newlands Road and ancillary infrastructure.

The application is accompanied by all the relevant documentation, which is referenced sequentially as follows and set out in Document 1 - Môr Hafren ERF Planning Application Document Reference List, GP Planning, 4th September 2020.

The documents are referenced with a unique number, project reference, document title, author, date and revision, where applicable. Each Document has the reference number on the front cover.

Please note that non-redacted appendices to the Pre-Application Report are referenced as CONFIDENTIAL. Redacted versions are supplied for the public access portal,

The application documentation comprises the following:

Planning Forms and Documents

- **Doc 2** Môr Hafren ERF Planning Application Form Section S62D Town and Country Planning Act GP Planning, 4th September 2020

- **Doc 3** Môr Hafren ERF Proposed Application Articles 8 and 9(2) Notice GP Planning 19 June 2020
- **Doc 4** Môr Hafren ERF Proposed Application Article 9(3) Notice GP Planning 19 June 2020
- **Doc 5** Môr Hafren ERF Certificate of Ownership - Certificate B Notice Under Article 16 (1)(a) GP Planning 4 September 2020
- **Doc 6** Môr Hafren ERF Article 6 Acceptance of Notification Letter to Applicant - 3236340 PINS 12 September 2019
- **Doc 7 Redacted** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 1 September 2020.
- **Doc 7.1 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.2 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.3 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.4 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.5 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.6 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.7 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.8 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.9 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.10 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.11 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.12 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.13 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.14 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.15 Redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.16 Redacted Appendix B.6** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 7.17 Redacted Appendix D** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.

FOR DATA PROTECTION REASONS, THE FOLLOWING FILES ARE MARKED CONFIDENTIAL

- **CONFIDENTIAL A Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL B Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL C Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL D Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL E Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL F Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL G Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL H Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL I Non-redacted Appendix A-C** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL J Non-redacted Appendix B.6** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL K Non-redacted Appendix B.6** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **CONFIDENTIAL L Audio File** Môr Hafren ERF Article 11 Pre-Application Consultation Report, Proteus 3rd September 2020.
- **Doc 8** Môr Hafren ERF Design and Access Statement, GSDA, 2nd September 2020, Issue 2
- **Doc 9** Môr Hafren ERF Planning Statement, GP Planning, 3 September 2020, Revision 2 September 2020, Issue 2
- **Doc 10** Môr Hafren ERF Waste Planning Assessment, GP Planning, 3 September 2020, Revision 2

Drawings

- **Doc 11** Môr Hafren ERF Dwg. PL100 Existing Site Layout, GSDA, 200820
- **Doc 12** Môr Hafren ERF Dwg. PL101 Site Layout, GSDA, 200820, Rev A
- **Doc 13** Môr Hafren ERF Dwg. PL102 Fencing Layout, GSDA, 200820, Rev A
- **Doc 14** Môr Hafren ERF Dwg. PL103 Boundary Zones and Buffers, GSDA, 200820
- **Doc 15** Môr Hafren ERF Dwg. PL110 ERF Ground Floor Plan, GSDA, 200820, Rev A
- **Doc 16** Môr Hafren ERF Dwg. PL111 ERF Roof Plan, GSDA, 200820
- **Doc 17** Môr Hafren ERF Dwg. PL120 Admin and Amenity Block, Ground and First Floor Plans, GSDA, 200820
- **Doc 18** Môr Hafren ERF Dwg. PL121 Admin and Amenity Block, Second and Third Floor Plans, GSDA, 200820
- **Doc 19** Môr Hafren ERF Dwg. PL200 Existing Site Sections, GSDA, 200820
- **Doc 20** Môr Hafren ERF Dwg. PL201 Proposed Site Sections, GSDA, 200820, Revision A
- **Doc 21** Môr Hafren ERF Dwg. PL300 North East and South East Elevations, GSDA, 200820
- **Doc 22** Môr Hafren ERF Dwg. PL301 South West and North West Elevations, GSDA, 200820

- **Doc 23** Môr Hafren ERF Dwg. PL302 North East and South East Hidden Elevations, GSDA, 200820
- **Doc 24** Môr Hafren ERF Dwg. PL303 North West Hidden Elevation (Without FGT and Residue Silo), GSDA, 200820
- **Doc 25** Môr Hafren ERF Dwg. PL310 ACC Elevations, GSDA, 200820
- **Doc 26** Môr Hafren ERF Dwg. PL311 Residue Silos Elevations, GSDA, 200820
- **Doc 27** Môr Hafren ERF Dwg. PL312 Fire Water Tank and Pump House Elevations, GSDA, 200820, Rev A
- **Doc 28** Môr Hafren ERF Dwg. PL313 Substation and Transformer Elevations, GSDA,200820
- **Doc 29** Môr Hafren ERF Dwg. PL314 Cycle Shelter Plan and Elevations, GSDA, 200820
- **Doc 30** Môr Hafren ERF Dwg. 7000-S2 Proposed Drainage Strategy, Clarke Bond,260820, Rev P2
- **Doc 31** Môr Hafren ERF Dwg. 7001-S2 Indicative Off Site Foul Rising Main Route, Clarke Bond,260820, Rev P1
- **Doc 32** Môr Hafren ERF Dwg. GPP-MHBP-WC-20-01 Site Context Plan, GP Planning 150620 Revision 1

Environmental Statement & Technical Appendices

- **Doc 33** Môr Hafren ERF Non-technical Summary, GP Planning, 3 September 2020, Revision 2
- **Doc 34** Môr Hafren ERF Environmental Statement, GP Planning, 3 September 2020, Revision 1
- **Doc 35** Môr Hafren ERF Technical Appendix 6 Air Quality Assessment, Environmental Visage, 26th August 2020, Revision 6
- **Doc 36** Môr Hafren ERF Technical Appendix 7 Air Quality and Traffic, Environmental Visage, 26th August 2020 Revision 2
- **Doc 37** Môr Hafren ERF Technical Appendix 8 Health Impact Assessment, Environmental Visage, May 2020
- **Doc 38** Môr Hafren ERF Technical Appendix 9 Environmental Noise Impact Assessment, Sol Acoustics, 2 September 2020 Revision C
- **Doc 39** Môr Hafren ERF Technical Appendix 10 Appendix 1.1 Preliminary Ecological Appraisal, REC, 30th July 2019 Issue 1
- **Doc 40** Môr Hafren ERF Technical Appendix 10 Appendix 1.2 Ecological Verification Report, BMD, April 2020 Rev A
- **Doc 41** Môr Hafren ERF Technical Appendix 10 Appendix 1.3 Air Quality and Noise, BMD, April 2020
- **Doc 42** Môr Hafren ERF Technical Appendix 10 Appendix 1.4 File Note: eDNA Surveys, ADAS, 10th June 2020
- **Doc 43** Môr Hafren ERF Technical Appendix 10 Appendix 1.5 File Note: Reptile Surveys, ADAS, 19th June 2020
- **Doc 44** Môr Hafren ERF Technical Appendix 10 Appendix 1.6 Botanical Survey and Invertebrate Assessment, ADAS, 26th August 2020, Revision 01
- **Doc 45** Môr Hafren ERF Technical Appendix 11 Landscape and Visual Impact Assessment, ALD, 26 August 2020, Revision P08
- **Doc 46** Môr Hafren ERF Technical Appendix 11 LVIA Dwg.s, ALD, 1 August 2019, Part 1 Rev 04 and P05
- **Doc 47** Môr Hafren ERF Technical Appendix 11 LVIA Dwg.s, ALD, 1 August 2019, Part 2 Rev 04 and P05
- **Doc 48** Môr Hafren ERF Technical Appendix 11 LVIA Dwg.s, ALD, 1 August 2019, Part 3 Rev 04 and P05
- **Doc 49** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1034 RevP02 - Viewpoint 1 Winter, ALD, 10th June 2020, Revision P02
- **Doc 50** Môr Hafren ERF Technical Appendix 11 LVIA, A LD837_LD1053 Rev P02 - Viewpoint 2 Winter, ALD, 10th June 2020, Revision P01
- **Doc 51** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1036 Rev P02 - Viewpoint 3 Winter, ALD, 10th June 2020, Revision P01
- **Doc 52** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1037 - Viewpoint 4 Winter, ALD, 21st February 2020, Revision P01

- **Doc 53** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1038 - Viewpoint 5 Winter, ALD, 21st February 2020, Revision P01
- **Doc 54** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1055 - Viewpoint 5 Winter Photomontage, ALD, 25th February 2020, Revision P01
- **Doc 55** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1054 -Viewpoint 5 Winter Wireframe, ALD, 25th February 2020, Revision P01
- **Doc 56** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1039 - Viewpoint 6 Winter, ALD, 21st February 2020, Revision P01
- **Doc 57** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1040 - Viewpoint 7 Winter, ALD, 21st February 2020, Revision P01
- **Doc 58** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1041 - Viewpoint 8 Winter, ALD, 21st February 2020, Revision P01
- **Doc 59** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1042 - Viewpoint 9 Winter, ALD, 21st February 2020, Revision P01
- **Doc 60** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1043 Viewpoint 10 Winter, ALD, 21st February 2020, Revision P01
- **Doc 61** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1044 Viewpoint 11 Winter, ALD, 21st February 2020, Revision P01
- **Doc 62** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1045 Viewpoint 12 Winter, ALD, 21st February 2020, Revision P01
- **Doc 63** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1056 Viewpoint 12 Winter Photomontage, ALD, 21st February 2020, Revision P01
- **Doc 64** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1046 Rev P02 Viewpoint 13 Winter, ALD, 10th June 2020 Revision P02
- **Doc 65** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1057 Rev P02 Viewpoint 13 Winter Photomontage, ALD, 10th June 2020, Revision P02
- **Doc 66** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1047 Viewpoint 14 Winter, ALD, 21st February 2020, Revision P01
- **Doc 67** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1048 Viewpoint 15 Winter, ALD, 21st February 2020, Revision P01
- **Doc 68** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1049 Viewpoint 16 Winter, ALD, 21st February 2020, Revision P01
- **Doc 69** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1050 Viewpoint 17 Winter, ALD, 21st February 2020, Revision P01
- **Doc 70** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1058 Viewpoint 17 Winter Photomontage, ALD, 25th February 2020, Revision P01
- **Doc 71** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1051 Viewpoint 18 Winter, ALD, 21st February 2020, Revision P01
- **Doc 72** Môr Hafren ERF Technical Appendix 11 LVIA, ALD837_LD1052 Viewpoint 19 Winter, ALD, 21st February 2020, Revision P01
- **Doc 73** Môr Hafren ERF Technical Appendix 12 Transport Assessment, Origin Transport, August 2020, Revision 6
- **Doc 74** Môr Hafren ERF Technical Appendix 13 Historic Environment Desk Based Assessment, RPS Group, 27th August 2020, Revision 3
- **NOTE THERE IS NO TECHNICAL APPENDIX 14 INTENTIONAL**
- **Doc 75** Môr Hafren ERF Technical Appendix 15 Flood Consequences Assessment & Drainage, Clarke Bond, 26th August 2020, Revision P7
- **Doc 76** Môr Hafren ERF Habitats Regulations Assessment Screening, BMD, August 2020, Revision A
- **Doc 77** Môr Hafren ERF Habitats Regulations Assessment Screening, European Sites, BMD, August 2020

For ease of referencing, the letter is referenced Document 78.

I refer below to correspondence with Natural Resources Wales (NRW). That letter is referenced Document 79 and Appendix A to that letter is referenced Document 80.

Planning Fees

The application is accompanied by the relevant fees, split as follows:

- Application Fee Amount = £15,350
Payment Reference: 3236340_DNS
- Local Impact Fee amount = £7,750
Payment Reference: 3236340_LIR

I can confirm that both payments were made by 9.00 a.m. on 4th September 2020.

Documentation

As stated above, Document 1 comprises the document reference list, which we are happy to add to and update as we go through the Examination process, if that would be of assistance to PINS and the appointed Inspector.

It provides a clear definition, in plain English, of each document.

Formal Consultation

The application is accompanied by Document 7, The Pre-application Consultation Report (PAC Report, and its associated appendices indexed as subsets of 7. Please note that a non-redacted set of appendices are also attached and marked confidential for data protection purposes.

The PAC Report describes in full the pre-application and formal consultation carried out in accordance with the relevant articles. Copies of the relevant notices are included as Documents 3,4 and 5.

Documentation Updates

The Proposed Application documents were 'watermarked' as such to differentiate them from the formal submission.

Document 1 indicates which documents have been modified and provides a brief explanation for the changes.

There are no substantive changes and in the main relate to our response to comments from Natural Resources Wales in their letter dated 13th August 2020, addressed to our info@morhafrenbiopower.co.uk.

We have responded in full to NRW at the time of this submission and attach our response and Appendices for your ease of reference. It is our intention to engage with NRW prior to and during formal consultation to ensure their concerns are fully addressed.

In summary, we have addressed the four requirements set out in letter by:

- Providing as Appendix 1 to our letter a Note on air quality which clarifies the approach to modelling, provides additional commentary and tables which have been pulled through to the air quality and air quality traffic assessments, as well as the Environmental Statement;
- Providing Drawing PL103 – Boundary Zones and Buffers, a new drawing, that shows relative distances from the adjacent ditch;
- Repositioning the fence on the western boundary to maintain an appropriate buffer zone. This has resulted in a minor revision to the Site Layout Plan which is now Drawing PL101, Revision A. Annotation previously referred to as ‘Pump House’ has been amended to reflect its function as a Fire Water Pumping Station.
- Providing Drawings PL102A, PL110A, PL201A and PL312A are revisions to the Proposed Application Drawings reflecting the revised fence line and annotation of the pump house.
- Updating references to these drawings in our submitted documentation.
- Reviewing the construction noise assessment as a consequence of the need to move the proposed acoustic fence to the east, with no change to the outcome of the assessment.
- Confirming that a 2m high acoustic fence will be erected around the site (with the exception of the site entrance and exit) during the construction period. It is intended that the proposed 2.4m high palisade fencing will be erected prior to construction and the acoustic fence will be erected inside. This will form a solid barrier between the construction site and the buffer area to the ditch. The Planning Statement, Environmental Statement, Non-technical Summary have all been amended to reflect the ‘dual’ fencing.
- Confirming the intention to manage the adjacent ditch for the life of the facility and by providing high level principles for a Watercourse Management Plan that could be covered by a planning condition.
- Re-positioning the foul water pumping station to a more appropriate location towards the southern part of the site. This change is shown on Drawing 7000, revision P02, which is attached to this letter as Appendix D. The foul drainage route has been adjusted to suit the revised site layout plan. This change is shown on Drawing 7001, P01, which is attached as Appendix E to this letter. These drawings are now clearly shown and planning drawings (Documents 30 and 31).
- Confirming that matters pertaining to construction can adequately be addressed through the proposed CEMP condition.

In conclusion, we trust you find all of our documentation in order.

Please do not hesitate to contact me if you have any queries and I will gladly assist.

We look forward to the application being validated in due course.

Yours sincerely



Maureen Darrie
Director