



The Planning Inspectorate Yr Arolygiaeth Gynllunio

Adeilad y Goron Crown Building Ffôn/tel: 0303 444 5940
Parc Cathays Cathays Park
Caerdydd Cardiff e-bost/e- dns.wales@planninginspectorate.gov.uk
CF10 3NQ CF10 3NQ mail:

Mor Hafren Biopower
Maureen Darrie
GP Planning Ltd

Ein Cyf / Our Ref : DNS/3236340

Dyddiad / Date : 01/10/2020

(Sent by email)

Dear Ms Darrie,

Town and Country Planning Act 1990
The Developments of National Significance (Wales) Regulations 2016
The Developments of National Significance (Procedure) (Wales) Order 2016
The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Application by: Mor Hafren Biopower
Site: Land off Newlands Road, Cardiff

Thank you for submitting the above DNS application.

In order to complete the validation process we request further information, as set out below in relation to the submitted Environmental Statement (ES), under Regulation 24 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ("the 2017 EIA Regulations").

Construction Environmental Management Plan (CEMP)

- Further detail is requested on the mitigation measures intended to be included within the CEMP. This can be provided as additional information to be inserted into the text of the ES, or as an appended draft of the CEMP. In particular, paragraphs 10.5.3 and 10.5.4 of the ES should identify what specific on-site habitat elements and particular species protection measures will be incorporated in the CEMP, and also in the LEMP referred to in paragraph 10.5.5 of the ES. In addition, Sections 14.5 and 14.6 of the ES are too cursory. Paragraph 14.5.8 should be expanded to explain in what ways the effects identified at paragraphs 14.5.2-7 will be managed via the CEMP, and then summarised in Table 14.6 of the ES.

Further detail on chosen technology

- Further detail is requested regarding the process technology selected, beyond the outline provided at paragraphs 5.3.9 and 5.3.19 of the ES. The applicant is asked to add clarity to the ES and make it more explicit as to the technology that has been

Rydym yn Croesawu Gohebiaeth yn Gymraeg a Saesneg

We Welcome Communications in Welsh and English



selected and provide more detail on the inputs required to achieve the required combustion (i.e. the amount of oxygen and any other facilitating materials, including the amounts required, how these will be provided to the site, where stored, and the level/frequency of any associated vehicular movements).

Duration of construction phases

- Paragraph 4.8.2 of the ES which sets out the key construction phases fails to identify the duration of each key phase within the 36 month overall construction timescale. Further detail is requested to identify the duration of each key phase of construction, which is integral to understanding the level of significance of the various construction impacts and should be specified for clarity at paragraph 4.8.2 of the ES.

Transport movements during operation

- Further justification is requested, to explain how the estimated number of HGV movements (80 two-way HGV trips per day) has been derived. The ES should provide a detailed breakdown of how the anticipated levels of feedstock (200,000 tpa), residue (40,000 tpa) and any other HGV trips routinely generated by the facility operations translates into the 80 two-way HGV trip figure.

Additional clarification/corrections

The following are minor errors that need correcting, with specific examples of where these are found in the ES.

- Some tables have "Error! Reference source not found" flags in the right-hand column headers (e.g. tables 9.21 and 9.22).
- There are some erroneous references to the EA and the revised NPPF (2019), including at paragraphs 14.5.19 and 14.5.20 (p 368).
- There are some erroneous references to various further details being submitted at reserved matters stage (e.g. paragraphs 10.6.4 and 18.1.8). To clarify, this is a full application and further detail if needed can only be regulated by means of imposed conditions.

The publicity requirements under Regulation 24 of the 2017 EIA Regulations will be incorporated into the Inspectorate's consultation under Article 18 of The Developments of National Significance (Procedure) (Wales) Order 2016.

Please provide the requested information to the Planning Inspectorate by **9 October 2020**. Please contact us as soon as possible should you have any questions or concerns regarding the above.

Yours sincerely,

Max Thomas

Mr Max Thomas
Case Officer
Swyddog Achos