

Date • Dyddiad 18/10/2017

Your ref. • Eich cyfeirnod

My ref. • Fy nghyfeirnod NS/0241/16

Telephone • Ffôn 01437 764551

Email • Ebst Planning.support.team@pembrokeshire.gov.uk

www.pembrokeshire.gov.uk



Pembrokeshire County Council
Cyngor Sir Penfro

IAN WESTLEY, M.A. B.Eng.(Hons), C.Eng., M.I.Mech.E., M.C.I.B.S.E.
Chief Executive / Prif Weithredwr

Dr. STEVEN JONES, B.A.(Hons), D.M.S., M.B.A., Ph.D., M.C.I.M.
Director of Development
Cyfarwyddwr Datglybu

Pembrokeshire County Council,
County Hall, HAVERFORDWEST,
Pembrokeshire, SA61 1TP

Cyngor Sir Penfro,
Neuadd y Sir, HWLFFORDD,
Sir Benfro, SA61 1TP

Telephone / Ffôn 01437 764551
DX 98295 HAVERFORDWEST

Please ask for
Os gwelwch yn dda gofynnwch am

Mike Simmons

Mr Rhys Rigby
The Planning Inspectorate

dns.wales@pins.gsi.gov.uk

(by email only)

Dear Mr Rigby

**Proposed 49.9MW Biomass Energy Facility and Associated Development
(including Eco-Park) (Development of National Significance)**

PINS Ref. 3146073; LPA Ref. NS/0241/16

Land at Blackbridge & Waterson, Milford Haven, Pembrokeshire

I refer to the above, your correspondence dated 3rd October 2017 and email of 4th October stating that the Council's response must be received no later than 20th October. Thank you for extending the response deadline by one week. You have asked the Council to make final comments following the applicant's correspondence of 29th September 2017.

Whilst conscious of not wishing to re-state the content of previous correspondence, there is a concern that determination of the application has become fragmented with additional submissions being made at a relatively late stage, the opportunity for which does not appear to be prescribed in the DNS process. Because of this, a more piecemeal approach has resulted making the assessment of overall environmental effects much more difficult. This is compounded by previously expressed concerns in relation to clarity and consistency within the application which also affects the ability to undertake a comprehensive and robust assessment of environmental effects. In addition to matters relating to ecology, these concerns include:

- There remains a lack of details/plans of the proposed access road. Unreferenced chainage sections & shading on plan are not adequate to gain an understanding of what is proposed and its associated environmental effects. Furthermore block plans are not to a specified scale.

- Lack of clarity in respect of works to the existing jetty.
- No specified scale on a number of drawings.
- Ambiguity on proposed staff access routes/parking. What was presented at the hearing was a departure from that considered in the application in terms of how staff will access the site.
- There has been a further iteration of the master-plan drawing number EGW-01-001. The application included revision Rev C but latest version is Rev D (submitted with the Addendum Report) which includes amendments to building 4, introduction of 1a "Pipe Bridge", structure marked "1a" at NW next to bridge, change to siting of buildings 15 relative to 9, reconfiguration of building 18, introduction of 19a, reduction in 8a, changes to proposed route of access road, and introduction of new buildings in the form of bat-houses.
- Lack of clarity on proposed development and operations between buildings. Full details of conveyors and supporting structures not provided.
- Is 1a on drawing EGW-01-001RevD a proposed new swing-bridge? Although principle of a new swing bridge is supported as it provides a new dedicated route for the Coastal Path, there exists no details/assessment of effects.

On the matter of ecology, due to the further iterations of reports and amendments that have been received, it is difficult to comprehensively assess potential impacts on European Designated Sites but a focus on this macro level should not be lost when addressing some of the very detailed matters that are addressed in the applicant's latest correspondence. I have discussed matters further with NRW and can confirm that I have nothing to add to the comments that you will receive from NRW by Friday's deadline.

Please contact me if there are any matters that you wish clarified.

Yours sincerely



Mike Simmons
Development Manager (Major Projects and Planning Obligations)
Development Management