

Appendix to LPA letter of 26th March 2018

No.3 In-Combination Effects

It is not for the LPA to confirm projects that it 'thinks should be included'. It is for the developer, in producing the Shadow HRA, to consider the impacts of the proposed development on the integrity of the European site, either alone or in combination with other plans or projects, with regards to the site's structure and function and its conservation objectives. The developer should determine which other plans or projects may give rise to "in combination effects". Consideration should be given to in combination effects arising from direct or indirect, temporary or permanent or a variation of these.

TAN 5, Annex 3, section 12 states;

In considering the combined effects of other plans and projects it will normally be appropriate to take account of outstanding consents that are not started or fully implemented, ongoing activities or operations that are subject to continuing regulation (such as discharge consents or abstraction licences) and other proposals that are subject to a current application for any kind of authorisation, permission, licence or other consent. The effects of projects which have already been implemented and policies and proposals in adopted and published draft plans should also be included in the in-combination test. Thus, the assessment is not confined to proposals that require planning permission, but includes all plans and projects.

Eggedol may wish to consider consents such as the recent DNS approval at Valero Refinery, the Milford Marina Masterplan that has been resolved to approve by PCC, and projects in development such as Pembroke Dock Marine and also marine licences, discharge consents or waste management licences. TAN 5 recommends consideration of;

- projects which have already been implemented or completed;
- projects which have been given consent but which have not yet been implemented or completed;
- projects for which applications for consent have been made; and
- ongoing projects that are subject to periodic regulatory reviews, such as discharge consents or waste management licences.

No.6 West Wales Marine SAC

The original list refers to West Wales Marine cSAC and Skomer and Skokholm and Seas off Pembrokeshire cSPA. The 2nd March 2018 “Position Statement” only refers to the West Wales Marine cSAC

Description of the development (1)

This comment refers to ALL plans not just the one – earlier PCC comments referred to submitted plans not being to scale, highlighting the plans for building 4 only as an example.

Description of the development (6)

Condition required.

Description of the development (16)

As stated, whilst this matter remains to be addressed, NRW are the competent authority for the purposes of the ADMS models.

Assessment of Impacts (5)

Point 5 is not on the list - *Refurbishment plan of the jetty to include a comprehensive structural survey, scaled drawings, areas and extent of works which will impact seabed and work details of such potential impact (depth, methods of construction etc.)*