



USKMOUTH POWER STATION CONVERSION PROJECT

Pre-Application Consultation Report

On behalf of SIMEC Uskmouth Power Ltd

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Pre-Application Consultation
Report
V1
August 2020

Pre-Application Consultation Report

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Pre-Application Consultation Report

CONTENTS

1	INTRODUCTION	1
	Legislative context.....	1
	Format and Content of the Pre-Application Consultation Report.....	2
2	CONSULTATION	4
	Online Pre Application Consultation.....	4
	Pre Application Consultation.....	4
	Online Local Residents Consultation Event.....	4
	Site Notice.....	4
	Adjoining Owner/Occupier and Community Councillor Notices.....	5
	Availability of Draft Planning Application.....	5
	Specialist Consultees Consultation.....	6
	Requirement for Environmental Impact Assessment.....	6
3	RESPONSES TO THE CONSULTATION PROCESS	8
	Specialist Consultee Responses.....	8
	Adjoining Landowner/Occupier and Community Councillors Consultation Responses.....	11
	Third Party Representations.....	16
4	DEVELOPER RESPONSE TO CONSULTATION RESPONSES	24

Appendices

	Appendix A – Copy of the PAC website pages	25
	Appendix B – Pre application consultation press coverage	25
	Appendix C – Copies of invitation, online presentation, questions and responses	25
	Appendix D – Copy of site notice and declaration	25
	Appendix E – Adjoining owner/occupiers and Councillors notified, copy of the notices and letters	25
	Appendix F – Copy of specialist consultee letter	25
	Appendix G – Copy of EIA Screening Report and Opinion	25
	Appendix H – Copy of specialist consultee responses	25

1 INTRODUCTION

- 1.1 The Uskmouth Power Station Conversion Project (referred to as the “Uskmouth Conversion Project”) proposes to convert the existing coal fired power plant at Uskmouth Power Station to operate as a plant which would generate electricity through the combustion of waste derived fuel pellets.
- 1.2 The “Uskmouth Power Station” is the name of the site of an existing coal fired power station located near Newport in South Wales. Uskmouth Power Station is owned by the Applicant SIMEC Uskmouth Power Limited (“SUP”), a wholly owned subsidiary of Atlantis. SIMEC Atlantis Energy Limited (“Atlantis”) is the developer of the Uskmouth Conversion Project, which is developed by the Uskmouth Conversion Project Team.
- 1.3 The construction phase of the Uskmouth Conversion Project would require the following works:
1. The proposed operational development (referred to as the “Proposed Development”), which consists of all fuel storage and material handling infrastructure to be constructed external to the existing power station building. Planning permission is sought for the construction of the Proposed Development.
 2. The power station upgrade (referred to as the “Power Station Upgrade”), which are to be conducted inside the existing power station buildings for fuel combustion equipment conversion and plant life extension.
- 1.4 This Pre-Application Consultation (PAC) report has been prepared jointly by RPS with the Uskmouth Conversion Project Team at SUP, which took responsibility for the consultation and the collection and provision of all responses, for the following proposed development:
- “Erection of silos, conveyors, de dusting plant, extension to rail unloading shed and ancillary development.”*
- 1.5 From 1st August 2016, the Town and Country Planning (Development Management Procedure) (Wales) (Amendments) Order 2016 brought into effect various provisions set out in the Planning (Wales) Act 2015 including the requirement to undertake pre-application consultation which applies to all planning applications for 'major' development (full or outline) as defined in Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 and applications for Developments of National Significance (DNS).
- 1.6 This PAC report provides the background to the various consultation processes undertaken in accordance with the above legislation, sets out the consultation responses received and explains how the applicant has addressed these comments including any amendments to the development proposals which have emerged as a result.

Legislative context

- 1.7 As stated above the Town and Country Planning (Development Management Procedure (Wales) (Amendments) Order 2016 has brought into effect and provided the detail for various provisions set out in the Planning (Wales) Act 2015.
- 1.8 Detailed guidance on the requirements for pre-application consultation under Section 17 of the Planning (Wales) Act 2015 is contained in Annex 1 of the Welsh Government’s letter to Chief Planning Officers dated 1st February 2016. In November 2017 Welsh Government also issued ‘Best Practice Guidance for Developers’.
- 1.9 As set out in Annex 1 and the Best Practice Guidance, the applicant must undertake the following publicity/consultation procedures prior to the submission of the application:

- Display a Site Notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days before submitting an application for the proposed development.
- Write to any 'owner or occupier' of any land adjoining the land to which the proposed application relates.
- Make the draft application available publicly.
- Consult community and specialist consultees before applying for planning permission.
- Consider if Environmental Impact Assessment is required for the project.
- Submit a pre-application consultation (PAC) report as part of the planning application.

1.10 In May 2020 Welsh Government revised the pre application consultation regulation in light of the restrictions due to the Covid 19 pandemic, this came into force on midnight 19th May 2020. The Uskmouth Power Station Conversion Project pre application consultation complied with Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020, which introduced the following changes:

- The requirement to make information available for inspection at a location in the vicinity of the proposed development is removed. Developers must instead host all information online, with the web address clearly visible on the site notice (and on all direct neighbour notification letters if different from the site notice).
- The Amendment Order also requires developers to provide a contact telephone number. This will enable those without internet access to discuss the proposed development directly and request a hard copy of the documents to be sent to them.
- If hard copies are requested, an application must not be submitted before the period of 14 days beginning with the day on which the last document is sent..
- Article 2F of the DMPWO sets out what must be included in a pre-application consultation report, to be submitted with a planning application. This includes a declaration of the notice given about the consultation undertaken.
- The Amendment Order requires developers to declare that the prescribed information was made available on a website in accordance with the requirements, whether hard copies were requested and that such copies were supplied.

Format and Content of the Pre-Application Consultation Report

1.11 This PAC report follows the above legislation and guidance and therefore contains:

1. A copy of the site notice;
2. A declaration that the site notice was displayed in accordance with the statutory requirements i.e. in at least one place on or near the development site for no less than 28 days;
3. A copy of the notice given to owners and occupiers of adjoining land;
4. Copies of all notices provided to councillors, town and community councils and specialist consultees;
5. A summary of all issues raised in response to the statutory publicity (i.e. site notice and letters to owners and occupiers – the developer must confirm whether the issues raised have been addressed and if so, how they have been addressed; and

PRE-APPLICATION CONSULTATION REPORT

6. Copies of all responses received from specialist consultees with an explanation of how each response has been addressed.
 7. A declaration that the prescribed information was made available on a website in accordance with the requirements, whether hard copies were requested and that such copies were supplied.
- 1.12 In addition to the above, the PAC report includes a summary of all of the responses received from interested third parties.

2 CONSULTATION

Online Pre Application Consultation

- 2.1 Uskmouth Power Station hosted the Pre Application information on the Simec Atlantis Energy website in line with the May 2020 Welsh Government revised pre application consultation regulation in light of the restrictions due to Covid 19 pandemic, this came into force on midnight 19th May 2020. The Uskmouth Conversion Project pre application consultation complied with Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020
- 2.2 The Pre-Application consultation document suite was hosted at:
<https://simecatlantis.com/uskmouth-power-station-planning-application/>
- 2.3 See **Appendix A** for a copy of the PAC website pages, including digital exhibition posters and virtual tour.

Pre Application Consultation

- 2.4 The pre application consultation was discussed within the following external publications (see **Appendix B**):
- South Wales Argus 29th May 2020.
 - Wales Online 1st June 2020.

Online Local Residents Consultation Event

- 2.5 Following feedback during dialogue with Nash Community Council (the local community council) and given the inability to hold a physical public consultation event, Uskmouth Conversion Project team organised a 'live' Online Local Residents Consultation Event, this involved the Uskmouth Conversion Project team delivering a presentation with live audio and video followed by a Q&A session during which local residents had the opportunity to send text questions to the team via web chat, the Uskmouth Conversion Project team provided verbal answers. This action exceeds the minimum requirements for PAC.
- 2.6 The online presentation was held on Thursday 25th June 2020 from 13.00 to 14.30 and was publicised by postal invites delivered to 76 dwellings in the village of Nash and surrounding area on 23rd June 2020
- 2.7 7 people attended the exhibition and 7 questions were received on the day.
- 2.8 Copies of the invitation to local residents, including locations the invites were posted, online presentation, webchat questions and text version of Uskmouth responses are provided in **Appendix C**.

Site Notice

- 2.9 Uskmouth Power Station displayed a bi-lingual (English and Welsh) site notice in 8 separate locations:
1. Uskmouth Power Station security gatehouse window.
 2. Layby at entrance to Wales Coastal Path located on West Nash Road.
 3. Main entrance to RSPB at Newport Wetlands.

4. Bus stop near Nash Village Hall.
5. Bus stop at junction of Nash Road/West Nash Road.
6. Lamppost on West Nash Road.
7. Signpost on Nash Road.
8. Lamppost on Nash Road.

- 2.10 The notices were erected on Saturday 30th May 2020 and removed on July 9th 2020 – 40 days later, in excess of the required minimum of 28 days.
- 2.11 A copy of the site notice and a declaration to this effect is enclosed at **Appendix D** along with evidence of site notice placement.

Adjoining Owner/Occupier and Community Councillor Notices

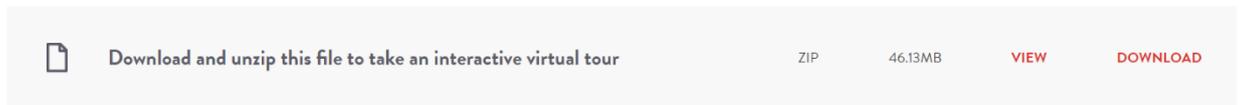
- 2.12 A Schedule 1D Notice Letter was sent to 13 occupiers/owners of land adjoining the development site and ward members on 29th May 2020.
- 2.13 SUP intentionally widened the 'adjoining' land boundary to notify a wider number of owners or occupiers. This action exceeds the minimum requirements for PAC.
- 2.14 A full list of 'adjoining' owner/occupiers and Councillors notified, together with a copy of the notices and letters sent is included in **Appendix E**.

Availability of Draft Planning Application

- 2.15 A dedicated website for the proposed development was live from 29th May 2020 and hosted at:
<https://simecatlantis.com/exhibition/>
- 2.16 The Pre-Application Consultation document suite (see **Appendix A**) was hosted at:
<https://simecatlantis.com/uskmouth-power-station-planning-application/>
- 2.17 The website's homepage contained a detailed description of the proposed development, together with a link to all the draft planning application documentation including;
- Contact page to submit comments on the proposals
 - Site location plan
 - Planning Statement
 - Design and Access Statement
 - Environmental Statement
 - Digital Poster Exhibition
 - Virtual tour of the Uskmouth Conversion Project site.
- 2.18 A digital poster exhibition was developed to highlight the main concerns and queries that were flagged during the scoping opinion consultation, the poster titles are shown below:
- Transport and Infrastructure.

- Sustainability criteria of the project & Timeline.
- Visual Impact.
- Planned Infrastructure.
- Existing Infrastructure.
- Traffic and transport.
- Fuel and Carbon Dioxide.
- Emissions Control.
- Health & Environment.

2.19 A virtual tour of the Uskmouth Conversion site is available on the Simec Atlantis Energy website



2.20 During the period 1st to 29th June 2020 the planning website was viewed by 558 users for an average of 2 minutes. The digital public exhibition was viewed by 128 users for an average of 2 half minutes. This would be sufficient time to download the relevant documents.

2.21 No hard copies of the application documentation were requested.

2.22 The website provided an email address which allowed visitors to comment on the development proposals directly to planning@simecatlantis.com.

Specialist Consultees Consultation

2.23 Developers are also required to undertake pre-application consultation with “specialist consultees”. The following were consulted on 29th May 2020:

- Natural Resources Wales;
- Cadw;
- Dwr Cymru Welsh Water;
- Newport City Council as the Highways Authority.

2.24 An example of the Specialist Consultee letter sent is included at **Appendix F**.

Requirement for Environmental Impact Assessment

2.25 A Screening Request was submitted to the Newport City Council on 21st August 2018. A Screening Opinion was received on 29th October 2018 and stated:

“Having completed the screening process with reference to schedule 3 of the regulations, I consider that the proposal is capable of having significant environmental effects and constitutes EIA development”

Geraint N. Roberts,

Principal Planning Officer, Newport City Council”

PRE-APPLICATION CONSULTATION REPORT

- 2.26 The Screening Opinion and associated report are included at **Appendix G**.
- 2.27 Consequently, the application is supported by an Environmental Statement.

3 RESPONSES TO THE CONSULTATION PROCESS

Specialist Consultee Responses

- 3.1 Letters were sent out to each of the 4 specialist consultees:
- Cadw;
 - Dwr Cymru Welsh Water;
 - Natural Resources Wales;
 - Newport City Council as the Local Highways Authority.
- 3.2 Responses from Cadw and DWCC were received by the deadline of 29th June 2020. SUP has been in contact with NRW Development, who provided their response on 29th July. NCC Local Highways Authority has not provided a PAC response to date. Several attempts were made to contact Local Highways Authority but were unsuccessful in obtaining a consultation response.
- 3.3 Table 3.1 overleaf provides a summary of all the matters raised from statutory consultees.
- 3.4 Copies of specialist consultee responses are included at **Appendix H**.

Table 3.1 Specialist Consultee Responses

Consultee	Comments	Developer Response
Cadw	<p>Requested an extension</p> <p>Scheduled monument MM092 Goldcliff Moated House Site ('the SAM') is located inside 3km of the proposed development (see figure 9.1 of ES) and figure 8.4k the landscape and visual assessment shows that it will have views of the proposed development. However, the SAM is not mentioned in the text of section 9 or in the more detailed desk-based assessment included as Appendix 9.1 of the ES.</p> <p>The impact of the proposed development on the setting of the SAM will be a material consideration in the determination of this application (see Planning Policy Wales 2018 section 6.1.23). Section 9 of the ES is therefore needs to be updated before the planning application is submitted to the LPA.</p> <p>Cadw should also be re-consulted on this statutory pre-planning application prior to the submission of the planning application.</p> <p>There may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Glamorgan-Gwent Archaeological Trust www.ggat.org.uk.</p>	<p>Uskmouth Power Station would prefer responses by Monday 29th June</p> <p>Chapter 9 of the ES concludes that there would be no change in views from the Scheduled moated house site north of Goldcliff due to the intervening topography and vegetation and as a result there would be no change in effect. There is no statutory requirement to re-consult Cadw prior to the submission of the planning application to the LPA.</p>
Dwr Cymru Welsh Water (DCWW)	<p>DCWW's initial PAC response requested a copy of the drainage proposal to be emailed as an attachment.</p> <p>The following comments were also provided:</p> <ul style="list-style-type: none"> • Foul flows only from the proposed development can be accommodated within the public sewerage system; • No highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system; • The development requires approval of Sustainable Drainage Systems (SuDS) features and recommends that the developer engage in consultation with the Local Authority, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features; • A water supply can be made available to service the proposed development; • There may be a need to apply to DCWW for any connection to the public sewer under Section 106 of the Water industry Act 1991; • Some public sewers and lateral drains may not be recorded on DCWW's maps of public sewers because they were originally privately owned and were transferred into public ownership by 	<p>An outline drainage strategy at Appendix 6.2 of the ES has been provided. SUP will ensure that any drainage layout or strategy submitted takes DWCC comments into account.</p> <p>SUP acknowledges that it is required to explore and exhaust all surface water drainage options in accordance with the drainage hierarchy, which states that discharge to a combined sewer shall only be made as a last resort.</p> <p>SUP will engage with the SAB in relation to the proposals for SuDS features.</p> <p>SUP does not anticipate the need for a new connection to the water supply of the public sewer as a result of the proposed operational development.</p> <p>SUP will contact DCWW to establish the location and status of any apparatus in and around our site prior to the commencement of development.</p>

PRE-APPLICATION CONSULTATION REPORT

nature of the Water Industry Regulations 2011. The presence of such assets may affect the proposal. You may contact DWCC to establish the location and status of any apparatus in and around the site. Under the Water Industry Act 1991 DWCC has rights of access to its apparatus at all times.

- DWCC provided copies of extract plans of water and sewer apparatus in the area.

Natural Resources Wales	Requested an extension of time	A 14 day extension of time from 29 th June 2020 to Monday 13 th July 2020 was provided.
	Requested further extension to 21 st July 2020	A further 7 days extension of time was provided.
	NRW responded on 29 th July 2020 as below:	
	<ol style="list-style-type: none"> 1. Requested revised air quality assessment to allow the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017; 2. Requested further information to demonstrate the proposal is unlikely to result in a detrimental impact to the maintenance of favourable conservation status of the population of otters (a European protected species) and to allow the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, including the provision of a Lighting Strategy during the determination of the application; and 3. Requested further information to demonstrate there are no unacceptable effects on water vole (a nationally fully protected species). 	Regarding request 1, the planning application proposes operational development only at an existing thermal electricity generating station. The emissions changes as a result of a change of fuel falls within the jurisdiction of the Environmental Permitting Regulations. Planning Policy Wales paragraph 5.13.3 states Planning authorities, other relevant local authority departments and NRW must work closely together to ensure that conditions attached to planning permissions and those attached to Environmental Permits are complementary and do not duplicate one another. Sufficient information should accompany development proposals in order for planning authorities to be satisfied that proposals are capable of effective regulation. NRW should assist the planning authority in establishing this position through the provision of appropriate advice. The parallel tracking of planning and environmental permitting applications should be the preferred approach, particularly where proposals are complex, so as to assist in mitigating delays, refusal of applications or conditions which may duplicate the permit/licence.
	In addition, NRW recommended the imposition of the following conditions:	It is therefore considered that the request for this information, which is within the remit of the Environmental Permitting Process, should not be duplicated via the planning system. Notwithstanding, this request will be addressed collaboratively during ongoing dialogue between the Uskmouth Conversion Project Team, NRW Development Planning and NRW Permitting teams
	<ol style="list-style-type: none"> 1. Condition 1: Restrict timing of piling activities to protect notified features of the Severn Estuary Special Protection Area and River Usk Special Area of Conservation; 2. Condition 2: Secure implementation of mitigation measures in Breeding Bird Survey (prepared by RPS, 24 December 2019); 3. Conditions 3–6: To ensure an acceptable scheme to deal with land contamination is agreed with the planning authority; and 4. Condition 7: Secure implementation of approved plans demonstrating the primary storage silos are above predicted flood levels. 	Regarding request 2, Uskmouth Conversion Project is preparing further information, including a Lighting Strategy, to be submitted during the determination of the planning application to enable a Habitats Regulation Assessment (HRA) to be undertaken. Regarding request 3, Uskmouth Conversion Project is preparing further information to be submitted during the determination of the planning application to enable a HRA to be undertaken. Uskmouth Conversion Project considers the suggested conditions are acceptable.
Local Highways Authority		RPS Transport has attempted to contact NCC highways to chase response to PAC, this has been unsuccessful.

Adjoining Landowner/Occupier and Community Councillors Consultation Responses

- 3.5 Notice letters were sent to the 13 owners/occupiers of adjoining land and community consultees (see Appendix E).
- 3.6 Three responses (Newport Uskmouth Sailing Club, DWCC and RSPB) were received from adjacent owner/occupiers and 5 response was received from local residents.
- 3.7 A single submission was received from community consultees from Nash Community Council, no submissions received from the local ward members.
- 3.8 Two submissions were received from third parties (CPRW, FoE). Planning Aid Wales made an enquiry but did not provide a comment. NCC Building Control sent a tender for building control works.
- 3.9 Table 3.2 below provides a summary of all the matters raised from adjoining landowners/occupiers and a response to how the matters have been addressed.
- 3.10 Many comments relate to the principle of the conversion of the power station, rather than the operational development requiring planning permission, which consists of all fuel storage and material handling infrastructure to be constructed external to the existing power station building
- 3.11 Questions have been posed from Adjoining Landowner/Occupier and Community Councillors that relate to Emission to Air and the combustion of waste, our responses have been provided to these queries for completeness, in line with the findings of the Environmental Statement. Please note that Uskmouth Conversion Project has submitted an Environmental Permit Regulations (EPR) variation application that considers in detail Emission to Air and these matters need not be duplicated within the planning process. Notwithstanding, this request will be addressed collaboratively during ongoing dialogue between the Uskmouth Conversion Project Team, NRW Development Planning and NRW Permitting teams

Table 3.2 Owner/Occupier and Community Consultee Responses

Consultee	Comments	Developer Response
Newport Uskmouth Sailing Club	<p>Concerns as follows:</p> <ul style="list-style-type: none"> Clarification on access to the Sailing club via car, bicycle and foot; Concern related to potential dust. 	<p>Access to the Newport Uskmouth Sailing Club would be maintained for members. There are no immediate plans to reinstate the concrete bridge over the rail track. The site road network will be upgraded to enable road access to the Sailing Club to be maintained in the event that a train was delivering fuel.</p> <p>Uskmouth Conversion Project does not anticipate that dust will be an issue. The fuel pellets will be delivered by rail and transported to sealed storage silos using covered conveyors, thereby mitigating dust dispersion.</p>
Nash Community Council	<p>Concerns as follows:</p> <ul style="list-style-type: none"> Combustion of waste; Traffic and transport impacts; Traffic in addition to Newport Wetlands; Why an alternative road access has not been provided 	<p>Combustion of waste</p> <p>The planning application proposes operational development for fuel storage and transportation only. A thermal combustion electricity generating station already exists on site. Combustion matters are dealt with under the Environmental Permitting Regulations and should not be duplicated within the planning process.</p> <p>Notwithstanding, Uskmouth Conversion Project will use a high specification, processed and consistent waste-derived fuel made from high calorific value 50% plastics and 50% biogenic materials (paper, wood, cardboard etc.) rather than mixed municipal waste as may be the case at new build energy from waste facilities. The ES submitted with the application considers Uskmouth Power Station will have a multi-stage flue gas treatment system designed to abate pollutants levels agreed with NRW, which have been shown to have a negligible impact on local air quality. The ES considers Air Quality and Health at Chapters 12 and 14.</p> <p>Chapter 12 Air Quality states stack emissions during operation have been assessed through detailed dispersion modelling using best practice approaches. The assessment has been undertaken based on a number of conservative assumptions. This is likely to result in an over-estimate of the contributions that will arise in practice from the facility. The results indicate that predicted contributions and resultant environmental concentrations of all pollutants considered would be of “negligible” significance. Overall, the air quality effects of the Uskmouth Conversion Project, both separately and cumulatively, are not considered to be significant.</p> <p>Regarding impacts during construction, Chapter 12 Air Quality concludes that dust generation and plant vehicle emissions, are predicted to be of short duration and only. Before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as “not significant”.</p> <p>Chapter 14 Population and Health concludes that, overall, it is not anticipated that there would be any significant population and health effects resulting from the construction or operation of the Uskmouth Conversion Project, or through worst-case interactions with relevant cumulative developments in the area.</p> <p>Traffic and transport</p> <p>Traffic and transport is assessed in ES Chapter 10. The Uskmouth Conversion Project seeks to replicate previous operational transport at Uskmouth Power Station with fuel delivered by rail and operational consumables imported and ash exported by road.</p> <p>During operation, a maximum 30 HGVs into site and 30 HGVs leaving site – 60 daily movements is estimated with all fuel being delivered by rail as previously.</p> <p>The construction assessment for Uskmouth Conversion Project is based on a reasonable worst case scenario, with the construction traffic associated with the Proposed Development and Power Station Upgrade works taking place simultaneously over 18 months. This ensures a robust assessment with peak construction activity of 15 HGV’s into site</p>

and 15 HGV's leaving site – 30 daily movements. A peak of up to 157 staff vehicles are anticipated to be on site, coinciding with peak HGV movements, during the construction period.

In accordance with the IEMA guidelines, the sensitivity of receptors along Meadows Road to the south of the industrial estate, Nash Road and West Nash Road is considered to be low, and the magnitude of impact upon accidents and safety is deemed to be low. The effect on accidents and safety will therefore be of negligible significance, which is not significant in EIA terms.

Traffic in addition to Newport Wetlands

To ensure a robust assessment, this assessment has compared the future operational baseline year (2026), taking into account other schemes that are likely to affect the future baseline conditions, against a scenario which includes the Uskmouth Conversion Project and any predicted future traffic growth. The traffic numbers take into account the traffic to Newport Wetlands

Why an alternative road access has not been provided?

As set out within the Design and Access Statement (DAS), initially, two projects were being considered at the site for (1) the conversion of Uskmouth Power Station and (2) for construction of the pellet production facility, which were being progressed by two separate companies.

The pelleting plant, which was considered for the northern part of the Uskmouth Power Station site, would have generated large numbers of HGV vehicle movements. Therefore, road access through the adjoining Liberty Steel Newport (LSN) site to the north, into Uskmouth Power Station was being considered, linking up with Corporation Road further to the north, and being progressed by a separate project team. However, the EIA screening opinion provided by NCC in October 2018 highlighted significant road congestion and air quality concerns resulting from the 117 daily HGVs movements that would route via the Lysaght Junction with Corporation Road. In addition, the cancellation of the M4 Corridor around Newport project also made delivery of waste to and from the proposed pellet plant site via road less attractive. By late 2019 the decision was made not to progress the pelleting plant facility at Newport for these reasons and instead import all the fuel to power Uskmouth Power Station via rail, replicating previous operational activity of coal by rail.

Given the relatively modest operational HGV movements generated by the Uskmouth Conversion Project once operational, which could be accommodated via West Nash Road, a new access into Uskmouth Power Station was no longer required.

<p>RSPB Newport Wetlands</p>	<p>Concerns regarding:</p> <ul style="list-style-type: none"> • Air quality • Negative impacts on the amenity value of the Newport wetlands reserve • Traffic and transport • Use of the established rail network in the transportation of waste materials • Appendix 10.1: Transport Assessment is missing. • Furthermore, it is not clear whether a Construction Traffic 	<p>Air quality</p> <p>The planning application proposes operational development for fuel storage and transportation only. A thermal combustion electricity generating station already exists on site. Combustion matters are dealt with under the Environmental Permitting Regulations and should not be duplicated within the planning process. Notwithstanding, this request will be addressed collaboratively during ongoing dialogue between the Uskmouth Conversion Project Team, NRW Development Planning and NRW Permitting teams</p> <p>Chapter 12 Air Quality states stack emissions during operation have been assessed through detailed dispersion modelling using best practice approaches. The assessment has been undertaken based on a number of conservative assumptions. This is likely to result in an over-estimate of the contributions that will arise in practice from the facility. The results indicate that predicted contributions and resultant environmental concentrations of all pollutants considered would be of “negligible” significance. Overall, the air quality effects of the Uskmouth Conversion Project, both separately and cumulatively, are not considered to be significant.</p> <p>Regarding impacts during construction, Chapter 12 Air Quality concludes that dust generation and plant vehicle emissions, are predicted to be of short duration and only. Before the implementation of mitigation and controls, the risk</p>
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Management Plan (CTMP) will be included in the ES?

- Please note there is disparity in Anticipated HGV Movement tables between NTS and ES.

of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as “*not significant*”.

Chapter 14 Population and Health concludes that, overall, it is not anticipated that there would be any significant population and health effects resulting from the construction or operation of the Uskmouth Conversion Project, or through worst-case interactions with relevant cumulative developments in the area.

Negative impacts on the amenity value of the Newport wetlands reserve

The existing power station structures include the 120 m high stack, 46 m high brick boiler building and lower turbine house, other buildings and conveyor structures and low level ancillary infrastructure. In addition, the existing trees and scrub associated with perimeter earthworks would be retained around the site.

The main new structures that have the greatest potential to be visible from the surrounding landscape, townscape and seascape are the four primary storage silos (45 m high) on the south-east side of the main boiler house building located on the former coal stockpiling area and the two day silos (33 m high) located on the south-west side of the new development including the RSPB reserve and Walkers using the Wales Coast Path.

The proposed development consists of large scale buildings and infrastructure. However, these would be located within the context of an extensive industrial area of power generation and steel mill facilities on the River Usk. Due to their comparatively modest scale, the proposed development could be accommodated on the edge of this urban character area without significant effects on key features or elements. The proposal utilises redundant space on the site, including repurposing the former coal stock yard area for the four primary silos. The landscape effect on the visual and sensory aspects both directly on the host Eastern Usk Industrial Area and indirectly on the neighbouring aspect areas, which have a high or outstanding value is not considered to be significant and would not lead to unacceptable harm to townscape or landscape character. In accordance with the IEMA guidelines, the sensitivity of receptors along West Nash Road is considered to be low and the magnitude of impact upon pedestrian amenity is deemed to be low. The effect on pedestrian amenity due to predicted construction traffic along West Nash Road will therefore be of minor significance which is not significant in EIA terms.

Consequently, Uskmouth Conversion Project does not believe there will be significant impacts on the amenity value of Newport Wetlands Reserve.

Traffic and transport

Traffic and transport is assessed in ES Chapter 10. The Uskmouth Conversion Project seeks to replicate previous operational transport at Uskmouth Power Station with fuel delivered by rail and operational consumables imported and ash exported by road.

During operation, a maximum 30 HGVs into site and 30 HGVs leaving site – 60 daily movements is estimated with all fuel being delivered by rail as previously.

The construction assessment for Uskmouth Conversion Project is based on a reasonable worst case scenario, with the construction traffic associated with the Proposed Development and Power Station Upgrade works taking place simultaneously over 18 months. This ensures a robust assessment with peak construction activity of 15 HGV's into site and 15 HGV's leaving site – 30 daily movements. A peak of up to 157 staff vehicles are anticipated to be on site, coinciding with peak HGV movements, during the construction period.

In accordance with the IEMA guidelines, the sensitivity of receptors along Meadows Road to the south of the industrial estate, Nash Road and West Nash Road is considered to be low, and the magnitude of impact upon accidents and safety is deemed to be low. The effect on accidents and safety will therefore be of negligible significance, which is not significant in EIA terms.

Use of the established rail network in the transportation of waste materials

The operational Uskmouth Conversion Project seeks to replicate previous operational transport patterns, with all fuel pellets delivered by rail (coal delivery by rail). Rail delivery of fuel pellets to Uskmouth Power Station will drastically reduce the number of HGV movements generated. Uskmouth Conversion Project intends to adopt a 7-day working regime to replicate where necessary previous Uskmouth Power Station operational coal fired activity, this is consistent with all operational power stations. Vehicular access to Uskmouth Power Station will continue to be along the existing public highway access to Uskmouth Power Station utilised during previous and current operational activity.

Appendix 10.1: Transport Assessment is missing

Due to the size of the file this was available on request.

It is unclear whether a Construction Traffic Management Plan (CTMP) will be included in the ES?

The Construction Traffic Management Plan will be drafted by the conversion contractor once appointed. It is anticipated that a prior to commencement of development condition will be imposed and submitted ahead of construction and is not, therefore, part of the ES.

Disparity between anticipated HGV movement tables in NTS and ES

The slight disparity between the two documents has been corrected.

Third Party Representations

- 3.12 Uskmouth Conversion Project hosted an online presentation for local residents on 25th June 2020, seven interested parties dialled in. The Q&A session for this online presentation is provided at **Appendix C**. The questions received as part of this consultation event have been included as third party representations.
- 3.13 In addition to the above, four, third party representations were received via email during the 28 day PAC period a further four representations were received from:
- Friends of the Earth Cymru (FoE);
 - Campaign for Protection of Rural Wales (CPRW);
 - Planning Aid Wales; and
 - Building Control Manager at Newport City Council.
- 3.14 CPRW submitted its response dated 7 May 2020 to Newport City Council (Planning), copying in Uskmouth Conversion Project , to be read with the CPRW's earlier response to NRW's consultation on Uskmouth Power Station environmental permit variation. The comments provided by CPRW within Annex A are related to the Uskmouth Permit Variation Application and as such will be responded to by NRW.
- 3.15 FoE's response also reflect its submission to the NRW consultation on the Uskmouth Power Station environmental permit variation . Where detailed comments are considered to fall within the remit of the environmental permitting regulations these have not been included below other than in summarising the overall findings of the ES in respect of air quality.
- 3.16 The Building Control Manager at Newport City Council submitted a tender for future building control works and has therefore not been included in the summary table below.
- 3.17 Planning Aid Wales submitted a query on the location of documents which were provided. No further response was received from Planning Aid Wales and therefore, similarly, not included in the summary table below..
- 3.18 Uskmouth Conversion Project did not received any further representations by post.
- 3.19 Throughout the course of the PAC, Uskmouth Conversion Project did not receive any objections via telephone. All representations were made via email.
- 3.20 Questions have been posed from third party representatives that relate to Emission to Air and the combustion of waste, our responses have been provided to these queries for completeness, in line with the findings of the Environmental Statement. Please note that Uskmouth Conversion Project has submitted an Environmental Permit Regulations (EPR) variation application that considers in detail Emission to Air.
- 3.21 Table 3.3 overleaf provides a summary of all the matters raised from third parties and a response to how the matters have been addressed.

Table 3.2 Third Party Representations

Comments	Developer Response
Concerns regarding combustion of waste	<p>The planning application proposes operational development for fuel storage and transportation only. A thermal combustion electricity generating station already exists on site. Combustion matters are dealt with under the Environmental Permitting Regulations and should not be duplicated within the planning process.</p> <p>Notwithstanding, Uskmouth Conversion Project will use a high specification, processed and consistent waste-derived fuel made from high calorific value comprising approximately 50% plastics and 50% biogenic materials (paper, wood, cardboard etc.) rather than mixed municipal waste as may be the case at new build energy from waste facilities. The ES submitted with the application considers the 'project' and Uskmouth Power Station will have a multi-stage flue gas treatment system designed to abate pollutants to levels agreed with NRW, which have been shown to have a negligible impact on local air quality. The ES considers Air Quality and Health at Chapters 12 and 14.</p>
Concerns regarding structural integrity of road	<p>During pre-application discussions with the Local Highways Authority, Uskmouth Conversion Project has not been made aware of any known structural integrity issues with the road. If the Local Highways Authority identifies any concerns it could recommend the imposition of a prior to and following construction road condition survey where Uskmouth Conversion Project would be responsible for any repair works resulting from construction traffic.</p>
Concerns regarding impact upon bees	<p>ES Chapter 7 Ecology includes an invertebrate survey (Appendix 7.10). The invertebrate assemblage associated with the application site is considered to have low (district) ecological value.</p> <p>The retention of high value invertebrate habitat (boundary ditch banks, neutral grassland and part of short ephemeral/perennial vegetation) as part of the development substantially limits the magnitude of impact, which is identified as low. Overall, the significance of the effect on the invertebrate assemblage from construction would be negligible adverse, which is not significant.</p> <p>No additional adverse effects on invertebrates, beyond those identified during the construction phase, are associated with the operation of the Uskmouth Conversion Project.</p>
What is the location of the pellet plants to supply fuel to Uskmouth Conversion?	<p>The fuel pellet supplier is developing production plants in the UK to supply fuel pellets to Uskmouth Power Station via rail.</p>

PRE-APPLICATION CONSULTATION REPORT

What are the NRW emission limits Uskmouth Power Station operated under the Environmental Permit Regulations administered by NRW. The converted power station requires a permit variation application, which was submitted to NRW in December 2019.

Currently, emission limits are applied consistently across Europe. The Environmental Permitting Regulations refer to the Industrial Emissions Directive (IED), which is the principal directive covering industrial pollution control in the EU and currently the UK. This is informed by a series of technical notes summarising the Best Available Techniques (BAT) and achievable emission limits (BREF Notes). The emissions limits ultimately applied by NRW will be derived from the IED and associated BREF notes.

NRW is presently assessing our permit variation application and will confirm the emission limits that the operational station will be subject to within a draft permit that is likely to be subject to 28 day consultation period which we anticipate will begin in Q3 2020. The limits imposed by NRW will be no higher than those included within the accompanying air quality assessment.

The converted plant would be a net CO₂ producer, how does this fit with the UK and Wales target of zero carbon by 2050 and recent policies to combat the Climate Emergency

Fossil fuel based electricity generators, such as gas, are viewed as a key part of the UK's energy mix, even in a 'net zero' by 2050 scenario according to National Grid.

Large scale electricity storage to even out differences (volatility) in generation and demand is unavailable currently. Therefore, there is an ongoing requirement for power stations to provide (baseload) electricity when it is needed to complement intermittent renewable sources. This will support energy security during a period of increasing UK electricity demand from electrification of other sectors (e.g. transport and heating) while also transitioning towards decarbonisation that will see increasing volatility in the absence of large scale electricity storage.

The converted Uskmouth Power Station would potentially displace other primary fossil fuel, such as gas, based electricity generating stations in the future energy mix.

ES Chapter 13 Climate Change assesses the 20 year operational life of the project and the carbon impacts from combustion of fuel pellets by the proposed development, transport and recycling of ash. This is compared to emissions estimated for the future baseline at the application site, which would be operation of all three generator units at Uskmouth Power Station firing a mixture of coal and biomass fuel (as has occurred at other former coal fired power stations such as Drax and Lynemouth). Compared to this future baseline, the proposed development (operation of two power station generator units firing fuel pellets) the project is predicted to reduce greenhouse gas (GHG) emissions in total and per unit of electricity generated with a consequential beneficial effect in terms of carbon.

Opportunities to co-locate with users of carbon (e.g. food and drink industry and pharmaceuticals) and carbon capture and storage (CCS) are being actively investigated and monitored and will be implemented wherever feasible.

During the online presentation you mentioned that there would be continuous monitoring of emissions

The continuous emission monitoring will be in place to monitor chemical species stipulated within NRW Environmental Permit, with feedback to the control room.

PRE-APPLICATION CONSULTATION REPORT

During the online presentation you indicated also would you be monitoring the CI and FI content of the fuel pellets or are you relying on the QA of N+P?

The fuel supply agreement and specification will have an upper limit to minimise the amount of Chlorine entering the combustion process. In addition, flue gas treatment will be applied to reduce acid gases and comply with Emission Limit Values. There will be continuous monitoring of HCl emissions.

Reduction in the cost of renewables and likely introduction of various energy storage solutions won't these developments make the power station uneconomic well before the planned end of life of the power station?

The Uskmouth Conversion Project intends to contribute to meet the need for underlying 'on demand' generation to supplement and support generation from intermittent renewable energy sources. Many renewable energy sources cannot be accurately predicted, and large scale electricity storage to even out differences in generation and demand are not available. Therefore, some power stations that can produce electricity when it is needed are predicted will be required to support net zero by 2050 targets. National Grid sees electricity from fossil fuel sources as key to the energy mix even in a net zero scenario. Undertaking this conversion means the power station can work alongside increasing generation from intermittent renewable sources to help make sure demand can be met and we have energy security.

Why has an alternative road access not been provided?

As set out within the Design and Access Statement (DAS), initially, two projects were being considered at the site for (1) the conversion of Uskmouth Power Station and (2) for construction of the pellet production facility, which were being progressed by two separate companies. The pelleting plant, which was considered for the northern part of the Uskmouth Power Station site, would have generated large numbers of HGV vehicle movements. Therefore, road access through the adjoining Liberty Steel Newport (LSN) site to the north, into Uskmouth Power Station was being considered, linking up with Corporation Road further to the north, and being progressed by a separate project team. However, the EIA screening opinion provided by NCC in October 2018 highlighted significant road congestion and air quality concerns resulting from the 117 daily HGVs movements that would route via the Lysaght Junction with Corporation Road. In addition, the cancellation of the M4 Corridor around Newport project also made delivery of waste to and from the proposed pellet plant site via road less attractive. By late 2019 the decision was made not to progress the pelleting plant facility at Newport for these reasons and instead import all the fuel to power Uskmouth Power Station via rail, replicating previous operational activity of coal by rail. Given the relatively modest operational HGV movements generated by the Uskmouth Conversion Project once operational, which could be accommodated via West Nash Road, a new access into Uskmouth Power Station was no longer required.

Suggestion that the proposals are DNS

Uskmouth Conversion Project has taken legal advice on these matters, supported by Counsel's Opinion. The advice is that the proposed development is not a Development of National Significance (DNS) as it would not increase the installed generating capacity of the power station. Taking the coal fired power station on a non-operational basis is not considered to be the correct baseline for the purposes of EIA either. Rather, Counsel has advised that the correct baseline must be what is likely to be the case if the proposed development does not go ahead, this may not necessarily be the current state of the environment but the likely state of the environment if the project does not go ahead. This corresponds with the common interpretation of a 'fallback' position as a hypothetical scenario where planning permission is not forthcoming and what could be achieved without the requirement for further consent or achieved within existing lawful use and/or utilising permitted development rights.

Air quality concerns

Chapter 12 Air Quality states stack emissions during operation have been assessed through detailed dispersion modelling using best practice approaches. The assessment has been undertaken based on a number of conservative assumptions. This is likely to result in an over-estimate of the contributions that will arise in practice from the facility. The results indicate that predicted contributions and resultant environmental

PRE-APPLICATION CONSULTATION REPORT

concentrations of all pollutants considered would be of “negligible” significance. Overall, the air quality effects of the Uskmouth Conversion Project, both separately and cumulatively, are not considered to be significant.

Regarding impacts during construction, Chapter 12 Air Quality concludes that dust generation and plant vehicle emissions, are predicted to be of short duration only. Before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as “*not significant*”.

Chapter 14 Population and Health concludes that, overall, it is not anticipated that there would be any significant population and health effects resulting from the construction or operation of the Uskmouth Conversion Project, or through worst-case interactions with relevant cumulative developments in the area.

Concerns about Impact upon ecology

Chapter 7 Ecology concludes that all impacts on nature conservation designations and habitats during construction and operation of the Uskmouth Conversion Project are negligible.

There is potential for minor adverse residual effects wintering birds, breeding birds, water vole and otter during the construction of the primary silos through noise. The design and implementation of sensitive construction working methods for the silos would control noise levels the worst-case residual impact would be expected to be negligible adverse. These effects are not significant for the EIA.

The operational residual effects on designated sites are negligible adverse while on habitats and some species the predicted effect is negligible beneficial as the habitats being created for biodiversity, on areas that are currently bare ground, become established and extend the resources for wildlife in and around the Uskmouth Conversion Project.

Objection to the reuse of Uskmouth Power Station

The planning application proposes operational development for fuel storage and transportation only. A thermal combustion electricity generating station already exists on site.

The project is inconsistent with the decision by the First Minister not to proceed with the M4 bypass in June 2019 in which potential damage to the Gwent Levels was a major factor

The proposed development does not significantly impact on the Gwent Levels. ES Chapter 7 Ecology and Chapter 10 Air Quality identify no significant impacts are predicted to air quality or environmental designations. The Uskmouth Conversion Project is within the existing power station perimeter boundary, utilises the previous coal stock yard area for silo storage, upgrades the existing rail facility and reuses existing infrastructure wherever possible. New construction is limited within the existing site boundary.

Conflict with Welsh Government (WG) principles about the local disposal of waste Wales and eliminate non-recyclable waste by 2050

The planning application proposes operational development for temporary fuel storage and transportation prior to combustion only. No change of use is proposed. A thermal combustion electricity generating station already exists on site and its dominant use would remain the generation of electricity following conversion to a new fuel.

Uskmouth Conversion Project would use a high specification fuel, rather than mixed municipal waste as may be the case at new build energy from waste facilities. The waste streams used to produce the fuel pellets are those which are unsuitable for recycling. This could be due to cross-contamination or mixing (such as textiles containing natural and man-made fibres), technical limitations of mechanical recycling processes (such as the ability to manage plastic films), or because it is not currently economic to recycle certain materials. The production of the fuel pellet tackles the issue of waste by utilising a fuel derived from societal waste destined for landfill, incineration (with or without energy recovery from less efficient EfW plants) or export abroad.

This currently non-recyclable waste stream is used as feedstock to produce the fuel pellets for the Uskmouth conversion. The Uskmouth conversion is therefore aligned with the Welsh Government’s Towards Zero Waste (June 2010) initiative of phasing out of landfill to high energy efficiency Energy from Waste plants by 2025.

The Uskmouth Conversion Project would contribute positively to planning policy objectives for energy recovery and zero landfill.

The Uskmouth Conversion compares favourably in terms of provenance of the fuel in comparison to combustion of biomass or continuation of coal (or a mix) that are the alternative futures for existing coal fired power stations. Both biomass and thermal coal supply are almost solely imported internationally currently. For a power station of similar magnitude to Uskmouth Power Station, biomass/wood pellets would be sourced almost exclusively from North America and Eastern Europe. Similarly, following the decline of the deep mined coal industry in the UK, thermal coal used in the UK is typically imported from Russia, the USA, Columbia, South Africa and Australia among others. These fuels also utilise biomass from forest depletion or coal mining that can have negative environmental effects. Displacing these fuels in the future would avoid global habitat destruction and the need for intensive wood harvesting and pellet production in the case of biomass or mining and preparation in the case of coal.

By making use of presently non-recyclable waste resources efficiently for UK baseload power generation there are significant sustainability benefits to replacing biomass and fossil fuel resources, which would require environmentally damaging practices for their sourcing and transportation long distances to UK power stations, with consequential negative impacts on the environment and climate.

The project life is 20 years and does not therefore preclude the elimination of non-recyclable waste by 2050.

Non-recyclable waste would be imported from England, RoUK or abroad

The Uskmouth Conversion Project intends to combust fuel pellets produced in the UK and transported via rail to Uskmouth Power Station

Generate CO₂ emissions resulting from transportation of waste fuel (by rail) and limestone, ammonium sulphate, urea and by products of incineration (all by lorry)

Uskmouth Conversion seeks to replicate previous operational activity utilising rail for fuel and road consumables imported into site and ash exported from site. Transport impacts are considered in Chapter 10 and Air Quality in Chapter 12. No significant impacts are identified in either case.

There would also be increased risks of accidents through the conveyance by road of toxic fly ash and bottom ash for disposal or reuse outside Wales

Traffic and Transport Chapter 10 considers road safety and accidents. For the construction and operational phase Personal Injury Accident (PIA) statistics have been obtained for the highway network for the latest available five year period, an analysis of which is set out in paragraph 10.66 and concludes there are no current road safety issues. The traffic generated by the Uskmouth Conversion Project construction would be similar to those which are already on the network. There would be no significant change in the character of the network and therefore it is considered that traffic related to Uskmouth Conversion Project construction would not alter the injury accident rate.

Proposals of a 40 year plant life i.e. beyond the target date of 2050

The Uskmouth Conversion Project has a 20 year planned lifetime.

Traffic and transport

Traffic and transport

Traffic and transport is assessed in ES Chapter 10. The Uskmouth Conversion Project seeks to replicate previous operational transport at Uskmouth Power Station with fuel delivered by rail and operational consumables imported and ash exported by road. During operation, a maximum 30 HGVs into site and 30 HGVs leaving site – 60 daily movements is estimated with all fuel being delivered by rail as previously.

PRE-APPLICATION CONSULTATION REPORT

The construction assessment for Uskmouth Conversion Project is based on a reasonable worst case scenario, with the construction traffic associated with the Proposed Development and Power Station Upgrade works taking place simultaneously over 18 months. This ensures a robust assessment with peak construction activity of 15 HGV’s into site and 15 HGV’s leaving site – 30 daily movements. A peak of up to 157 staff vehicles are anticipated to be on site, coinciding with peak HGV movements, during the construction period.

In accordance with the IEMA guidelines, the sensitivity of receptors along Meadows Road to the south of the industrial estate, Nash Road and West Nash Road is considered to be low, and the magnitude of impact upon accidents and safety is deemed to be low. The effect on accidents and safety will therefore be of negligible significance, which is not significant in EIA terms.

It is important to ensure that all emissions are “future-proofed” and that they are already compliant with the legislation and policies applying in Wales, including the Wellbeing of Future Generations Act

Emission limits are periodically reviewed as mandated by the Industrial Emissions Directive. The latest review, via the publication of the Waste Incineration Sector BREF note, was published in late 2019 and there is currently no timetable to review again – historically there has been at least an 8 year period between reviews and often longer. There is no basis on which to assess emissions against unknown future limits.

Further information on how PAC was carried out

Uskmouth Conversion Project have followed recent Welsh Government Legislation related to pre application consultation (PAC) during Covid 19. The suite of PAC documents is intended to be hosted upon our website (not the NCC website). Upon completion of the 28 day PAC we will submit the PAC report alongside the full planning application and EIA to NCC who will then host the PAC report, full planning application and EIA upon their site. FoE are free to further engage with NCC during their consultation

This proposal would also contradict the goals set out in the Wellbeing of Future Generations Act which all public bodies should be working to achieve, in particular the goals of a healthier Wales, a more equal Wales, a resilient Wales and a globally responsible Wales, as well as Wales’ commitment to tackling the climate emergency

A table similar to the below will be included within the Planning Statement demonstrating how the proposal can contribute to the Well-being of Future Generations (Wales) Act 2015

How the Uskmouth Conversion Project can Contribute to the Well-being of Future Generations Act 2015

Well-being Goal	How the Uskmouth Conversion Project can contribute the WBFG goals
A prosperous Wales	The proposal will generate economic benefit for Wales. This will be through job creation during construction and operation and through other forms of local economic benefit. The project will also encourage co-location with other high energy users and promote Newport as a centre for the digital economy.
A resilient Wales	The proposal sympathetically recognises and seeks to protect and enhance the local ecology, soils and water supply. The proposals recognise and complement the long-term ecology objectives for the site.
A healthier Wales	it is not anticipated that there would be any significant population and health effects resulting from the construction or operation of the Uskmouth Conversion Project, or through worst-case interactions with relevant cumulative developments in the area.
A more equal Wales	The proposal will create opportunities for people in Wales, (regardless of background and circumstances) to share in the economic opportunities of the development, through jobs and other benefits.

PRE-APPLICATION CONSULTATION REPORT

A Wales of cohesive communities	The proposal will generate benefits to local communities in terms of jobs and facilitating jobs in other sectors.
A Wales of vibrant culture and thriving Welsh Language	The proposal will not harm the local culture, heritage and language.
A globally responsible Wales	The proposal will reuse an existing power station and associated infrastructure, facilitate and complement decarbonisation targets by 2050, potentially displacing electricity generated using primary fossil fuels and also assist in dealing with non-recyclable waste that is either landfilled or exported.

Air Quality

The planning application proposes operational development for fuel storage and transportation only. A thermal combustion electricity generating station already exists on site. Combustion matters are dealt with under the Environmental Permitting Regulations and should not be duplicated within the planning process. Notwithstanding, this request will be addressed collaboratively during ongoing dialogue between the Uskmouth Conversion Project Team, NRW Development Planning and NRW Permitting teams

Uskmouth Conversion Project will use a high specification, processed and consistent waste-derived fuel made from high calorific value approx. 50% plastics and 50% biogenic materials (paper, wood, cardboard etc.) rather than mixed municipal waste as may be the case at new build energy from waste facilities. The ES submitted with the application considers the 'project' and Uskmouth Power Station will have a multi-stage flue gas treatment system designed to abate pollutants levels agreed with NRW, which have been shown to have a negligible impact on local air quality. The ES considers Air Quality and Health at Chapters 12 and 14.

Chapter 12 Air Quality concludes that impacts during construction, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the highly-recommended mitigation measures described in the IAQM construction dust guidance should reduce the residual dust effects to a level categorised as *"not significant"*.

Stack emissions during operation have been assessed through detailed dispersion modelling using best practice approaches. The assessment has been undertaken based on a number of conservative assumptions. This is likely to result in an over-estimate of the contributions that will arise in practice from the facility. The results of dispersion modelling reported in this assessment indicate that predicted contributions and resultant environmental concentrations of all pollutants considered would be of "negligible" significance.

Overall, the air quality effects of the Uskmouth Conversion Project, both separately and cumulatively, are not considered to be significant.

Fate of Ash sent to landfill

Uskmouth Conversion Project is actively investigating processes to recycle the ash as an industrial aggregate. In the event that this is not feasible, out of the 100% volume of waste converted into fuel pellets only 15% of the waste volume would be deposited into landfill after combustion to create electricity within a repurposed power station, significantly reducing the volume of material that would otherwise be deposited in landfill.

4 DEVELOPER RESPONSE TO CONSULTATION RESPONSES

4.1 As a result of the pre application consultation and the representations received, the following changes/amendments have been made:

- ES Chapter 9 updated to reflect Cadw comments;
- Slight disparity in NTS and ES HGV movements removed;
- Minor amends to Environment Statement

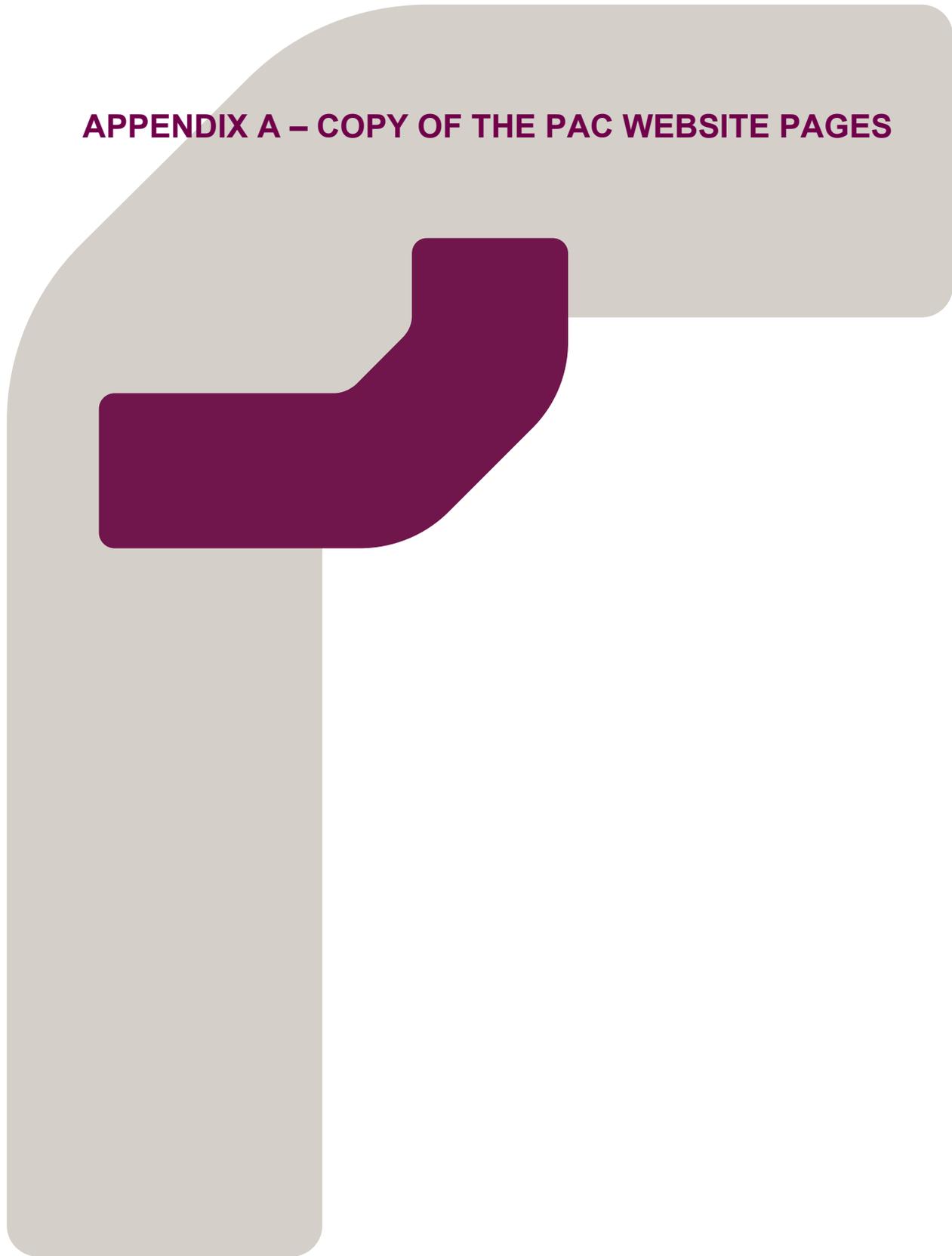
In addition, the following changes will be made:

- Lighting strategy being undertaken;
- Table of how the project can contribute to Well Being and Future Generations Act (Wales) 2015 added to Planning Statement;
- Further information is to be submitted to enable a HRA to be undertaken.
- The Uskmouth Conversion Project has submitted an Environmental Permit Regulations (EPR) variation application that considers in detail Emission to Air and these matters need not be duplicated within the planning process. Notwithstanding, this request will be addressed collaboratively during ongoing dialogue between the Uskmouth Conversion Project Team, NRW Development Planning and NRW Permitting teams

4.2 It is considered Uskmouth Conversion Project Team (SUP) has complied with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendments) Order 2016 in respect of pre-application consultation requirements.

-----END-----

APPENDIX A – COPY OF THE PAC WEBSITE PAGES



USKMOUTH POWER STATION PLANNING APPLICATION

Uskmouth Power Station

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020

The Uskmouth Power Station Conversion Project (referred to as the Uskmouth Conversion Project) proposes to convert the existing coal fired power plant at Uskmouth Power Station to operate as a plant which would generate electricity through the combustion of waste derived fuel pellets.

SIMEC Atlantis Energy Limited (Atlantis) is the developer of the Uskmouth Conversion Project. The Uskmouth Power Station is an existing coal fired power station located near Newport in South Wales. Uskmouth Power Station is owned by the Applicant SIMEC Uskmouth Power Limited (SUP), a wholly owned subsidiary of Atlantis.

SUP is applying to Newport City Council (NCC) for Planning Permission for the erection of silos, conveyors, de-dusting plant, extension to the rail unloading shed and ancillary development (the Proposed Development) at Uskmouth Power Station. This fuel storage and material handling infrastructure to be constructed pursuant to the Proposed Development is external to the existing power station buildings.

The technical works required for fuel combustion equipment conversion and plant life extension (the Power Station Upgrade) will to be conducted inside the existing power station buildings.

The construction of the Proposed Development, together with the Power Station Upgrade, will facilitate the delivery of the operational phase of the Uskmouth Conversion Project.

The requirement to undertake pre-application consultation applies to planning applications for major developments. The Proposed Development is a major development. To enable pre-application consultation to take place and the subsequent submission of planning applications for major developments notwithstanding the challenges presented by COVID-19 (Coronavirus), the Welsh Government issued an Amendment Order on 18th May 2020 relating to pre-application consultation requirements during the emergency period. The information presented below complies with this requirement.

Pre Application Consultation for the planning application for the Proposed Development starts on Monday 1st June 2020 and concludes on Monday 29th June 2020. The following are made available online in links provided below:

USKMOUTH POWER STATION PLANNING APPLICATION

below:

- ▶ the proposed application;
- ▶ the plan which identifies the land to which the proposed application relates; – other plans, drawings and information necessary to describe the development ; and
- ▶ the design and access statement

If you are unable to access the documents electronically you may request copies of this information by emailing: planning@simecatlantis.com or by telephoning 01633 292 700 and selecting Option 1 security and planning enquiries.

Anyone who wishes to make representations about this proposed development must write to the Applicant at:

C/O Planning
Uskmouth Power Station
West Nash Road Newport
NP18 2BZ

or email the Applicant: planning@simecatlantis.com

Please note that due to the restrictions upon movement related to COVID-19, the public engagement events that were being planned by SUP cannot take place.

PLANNING DOCUMENTS FOR DOWNLOAD

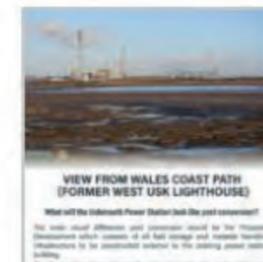
- [Environmental Statement Volume 1 and NTS](#)
- [Environmental Statement Volume 2 Figures](#)
- [Environmental Statement Volume 3 Appendices](#)
- [Uskmouth Draft Planning Application Drawings](#)
- [Uskmouth Draft Planning Application](#)

[PRE APPLICATION CONSULTATION EXHIBITION](#)

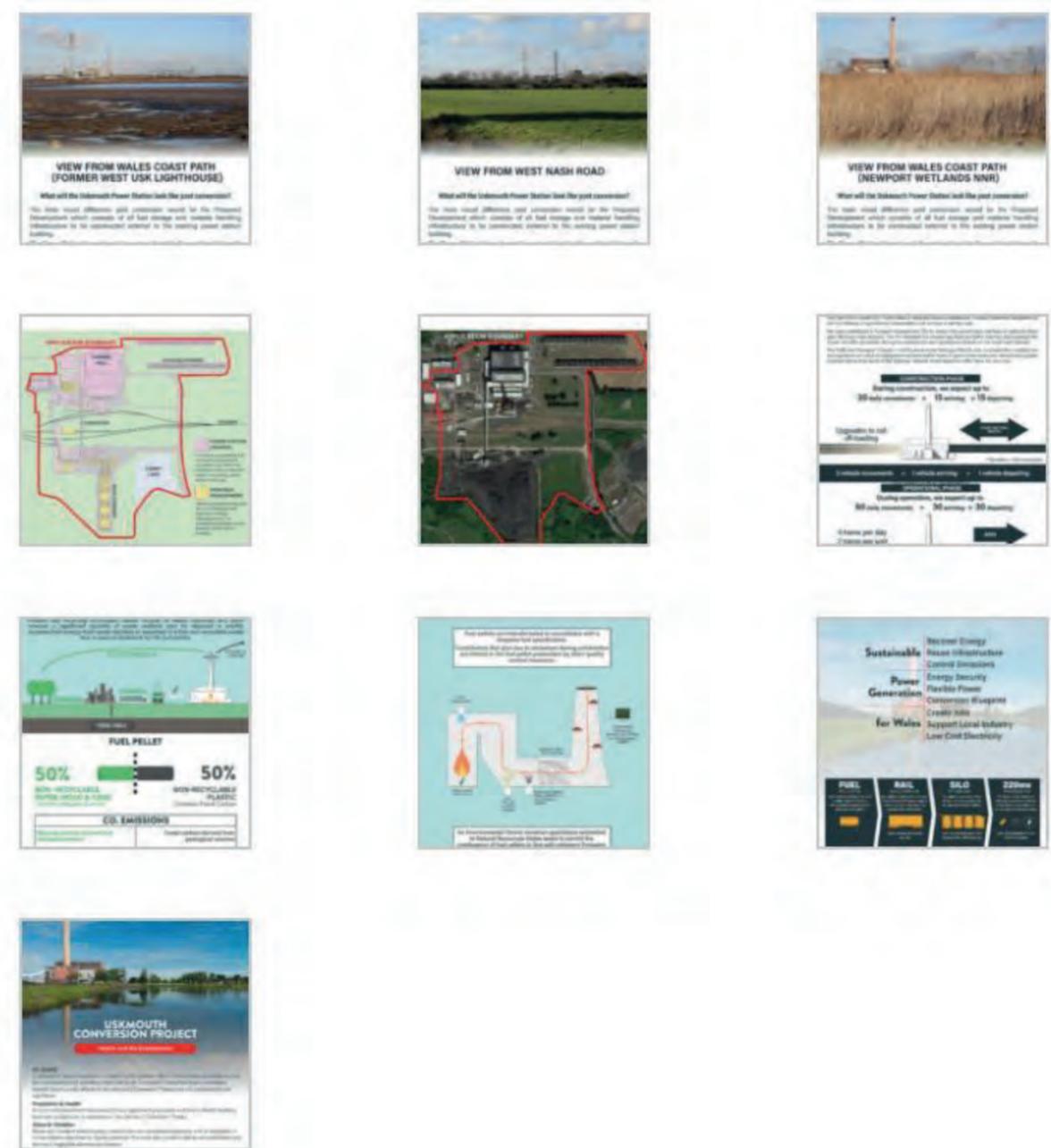
PRE APPLICATION CONSULTATION EXHIBITION



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PRE APPLICATION CONSULTATION EXHIBITION



USKMOUTH POWER STATION AERIAL



USKMOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 1 AND NTS

	Uskmouth Power Station Conversion ES Vol 1 Main Text	PDF	3.49MB	VIEW	DOWNLOAD
	Uskmouth Power Station Development ES - Non-Technical Summary (low res)	PDF	24.13MB	VIEW	DOWNLOAD

USK MOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 2 FIGURES

	Contents Volume 2 Figures List	PDF	143.85KB	VIEW	DOWNLOAD
	Figure 1.1 Site Location Plan	PDF	5.16MB	VIEW	DOWNLOAD
	Figure 1.2 Site Boundary Plan	PDF	2.54MB	VIEW	DOWNLOAD
	Figure 2.1 - Ecological Constraints	PDF	5.03MB	VIEW	DOWNLOAD
	Figure 2.2 - Heritage and Landscape Constraints	PDF	5.47MB	VIEW	DOWNLOAD
	Figure 2.3 - Flooding and Air Quality Constraints	PDF	5.65MB	VIEW	DOWNLOAD
	Figure 2.4 - Existing Site Plan	PDF	5.57MB	VIEW	DOWNLOAD
	Figure 2.5 - Proposed Site Plan	PDF	3.20MB	VIEW	DOWNLOAD
	Figure 2.6 - Site Section 1	PDF	6.27MB	VIEW	DOWNLOAD
	Figure 2.7 - Site Section 2	PDF	3.26MB	VIEW	DOWNLOAD
	Figure 4.1 Cumulative Developments Plan	PDF	4.30MB	VIEW	DOWNLOAD
	Figure 7.1. Designated Sites Plan	PDF	2.97MB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 2 FIGURES

	Figure 7.1. Designated Sites Plan	PDF	2.97MB	VIEW	DOWNLOAD
	Figure 7.2. Phase I Habitats Plan _SUP Development	PDF	3.06MB	VIEW	DOWNLOAD
	Figure 7.3 Building and Tree Plan _SUP Development	PDF	2.43MB	VIEW	DOWNLOAD
	Figure 7.4 Biodiversity Enhancements Plan	PDF	12.29MB	VIEW	DOWNLOAD
	Figure 8.1 Designations	PDF	4.94MB	VIEW	DOWNLOAD
	Figure 8.2 Topography	PDF	3.68MB	VIEW	DOWNLOAD
	Figure 8.3a Day Silos ZTV	PDF	4.47MB	VIEW	DOWNLOAD
	Figure 8.3b Primary Silos ZTV	PDF	4.45MB	VIEW	DOWNLOAD
	Figure 8.4a-n Viewpoints with Effects Table	PDF	42.48MB	VIEW	DOWNLOAD
	Figure 8.5a LANDMAP VS	PDF	4.03MB	VIEW	DOWNLOAD
	Figure 8.5b LANDMAP VS + ZTV	PDF	4.12MB	VIEW	DOWNLOAD
	Figure 8.5c LANDMAP VS + Eval	PDF	4.05MB	VIEW	DOWNLOAD
	Figure 8.5d LANDMAP Hist + Eval	PDF	4.29MB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 2 FIGURES

	Figure 8.5c LANDMAP VS + Eval	PDF	4.05MB	VIEW	DOWNLOAD
	Figure 8.5d LANDMAP Hist + Eval	PDF	4.29MB	VIEW	DOWNLOAD
	Figure 8.5e LANDMAP Cult + Eval	PDF	4.17MB	VIEW	DOWNLOAD
	Figure 8.5f LANDMAP Landscape Habitats + Eval	PDF	4.12MB	VIEW	DOWNLOAD
	Figure 8.5g LANDMAP Geological Landscape + Eval	PDF	4.13MB	VIEW	DOWNLOAD
	Figure 8.6a-f Photomontages	PDF	29.10MB	VIEW	DOWNLOAD
	Figure 9.1 - Designated historic assets within 3km	PDF	3.11MB	VIEW	DOWNLOAD
	Figure 9.2 - Historic assets within 1km	PDF	2.64MB	VIEW	DOWNLOAD
	Figure 11.1 Noise Contour at 1.5m Daytime (0700 - 1900 hrs)	PDF	738.38KB	VIEW	DOWNLOAD
	Figure 11.2 Noise Contour at 4m Evening and Night_time (1900 - 2300 hrs)	PDF	741.47KB	VIEW	DOWNLOAD

USK MOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 3 APPENDICES

	Appendix 1.1 - EIA info requirements	PDF	113.17KB	VIEW	DOWNLOAD
	Appendix 1.2 - Statement of Expertise	PDF	143.50KB	VIEW	DOWNLOAD
	Appendix 4.1 - Scoping Report	PDF	2.77MB	VIEW	DOWNLOAD
	Appendix 4.2 - NCC Scoping Opinion	PDF	527.54KB	VIEW	DOWNLOAD
	Appendix 4.3 - Response to Scoping Opinion and Consultation	PDF	154.07KB	VIEW	DOWNLOAD
	Appendix 5.1 - Preliminary Risk Assessment Report	PDF	404.29KB	VIEW	DOWNLOAD
	Appendix 6.1 - Flood Consequences Assessment	PDF	1.37MB	VIEW	DOWNLOAD
	Appendix 6.2 - Outline Drainage Strategy (reduced file size)	PDF	2.01MB	VIEW	DOWNLOAD
	Appendix 7.1 - Preliminary Ecological Appraisal	PDF	5.38MB	VIEW	DOWNLOAD
	Appendix 7.2 - Bat Survey Report	PDF	5.02MB	VIEW	DOWNLOAD
	Appendix 7.3 - GCN Survey Report	PDF	1.46MB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 3 APPENDICES

	Appendix 7.4 - Water Vole and Otter Survey Report	PDF	1.89MB	VIEW	DOWNLOAD
	Appendix 7.5 - Breeding Bird Survey Report	PDF	4.41MB	VIEW	DOWNLOAD
	Appendix 7.6 - Coastal Bird Survey Report	PDF	3.09MB	VIEW	DOWNLOAD
	Appendix 7.8 - Reptile Survey Report	PDF	2.49MB	VIEW	DOWNLOAD
	Appendix 7.9 - Dormouse Survey Report	PDF	7.23MB	VIEW	DOWNLOAD
	Appendix 7.10 - Invertebrate Survey Report - Gibbs 2019	PDF	1.16MB	VIEW	DOWNLOAD
	Appendix 7.11 - Uskmouth Full HRA	PDF	706.83KB	VIEW	DOWNLOAD
	Appendix 9.1 - Desk Based Assessment	PDF	16.45MB	VIEW	DOWNLOAD
	Appendix 11.1 - Noise Planning Policy, Legislation and Guidance	PDF	833.49KB	VIEW	DOWNLOAD
	Appendix 11.2 - Noise Model Input Data	PDF	191.40KB	VIEW	DOWNLOAD
	Appendix 11.3a - Noise Baseline Sound Monitoring Information Part 1	PDF	563.93KB	VIEW	DOWNLOAD
	Appendix 11.3b - Noise Baseline Sound Monitoring Information Part 2	PDF	518.35KB	VIEW	DOWNLOAD

USK MOUTH POWER STATION PLANNING APPLICATION

ENVIRONMENTAL STATEMENT VOLUME 3 APPENDICES

	Appendix 9.1 - Desk Based Assessment	PDF	16.45MB	VIEW	DOWNLOAD
	Appendix 11.1 – Noise Planning Policy, Legislation and Guidance	PDF	833.49KB	VIEW	DOWNLOAD
	Appendix 11.2 - Noise Model Input Data	PDF	191.40KB	VIEW	DOWNLOAD
	Appendix 11.3a - Noise Baseline Sound Monitoring Information Part 1	PDF	563.93KB	VIEW	DOWNLOAD
	Appendix 11.3b - Noise Baseline Sound Monitoring Information Part 2	PDF	518.35KB	VIEW	DOWNLOAD
	Appendix 12.1-6 - Air Quality Technical Appendices	PDF	1.27MB	VIEW	DOWNLOAD
	Appendix 13.1 - GHG emission calculations	PDF	902.79KB	VIEW	DOWNLOAD
	Appendix 13.2 - Climate Change Legislation and policy	PDF	793.45KB	VIEW	DOWNLOAD
	Appendix 14.1 - Population and health baseline	PDF	795.87KB	VIEW	DOWNLOAD
	Volume 3 Appendices Contents	PDF	148.60KB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

USKMOUTH DRAFT PLANNING APPLICATION

	Uskmouth Design and Access Statement Final PAC Version	PDF	760.51KB	VIEW	DOWNLOAD
	Uskmouth Draft Planning Application Cover Letter Final PAC Version	PDF	43.90KB	VIEW	DOWNLOAD
	Uskmouth Draft Planning Application Form Final PAC Version	PDF	207.41KB	VIEW	DOWNLOAD
	Uskmouth Planning Statement Final PAC Version	PDF	381.90KB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

USKMOUTH DRAFT PLANNING APPLICATION DRAWINGS

	019784-RPS-CC-XX-DR-A-5300-P03- Existing Conveyor 17 Elevations	PDF	829.93KB	VIEW	DOWNLOAD
	019784-RPS-CC-XX-DR-A-5301-P03- Existing Conveyors 13, 14, 15 & 1	PDF	423.16KB	VIEW	DOWNLOAD
	019784-RPS-CC-XX-DR-A-5303-P05- Proposed Main Conveyor 13,15 &16	PDF	901.26KB	VIEW	DOWNLOAD
	019784-RPS-DD-00-DR-A-5000-P04- Proposed De-dusting Building Grou	PDF	134.98KB	VIEW	DOWNLOAD
	019784-RPS-DD-01-DR-A-5001-P04- Proposed De-dusting Building Roof	PDF	134.90KB	VIEW	DOWNLOAD
	019784-RPS-DD-ZZ-DR-A-5300-P04- Proposed De-Dusting Building Elev	PDF	608.55KB	VIEW	DOWNLOAD
	019784-RPS-DS-XX-DR-A-5000-P03-Day Silo Plans	PDF	141.49KB	VIEW	DOWNLOAD
	019784-RPS-DS-XX-DR-A-5200-P02- Proposed Day Silo Section	PDF	407.49KB	VIEW	DOWNLOAD
	019784-RPS-DS-XX-DR-A-5300-P03-Day Silo Elevations	PDF	879.78KB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

USKMOUTH DRAFT PLANNING APPLICATION DRAWINGS

	019784-RPS-LS-ZZ-DR-A-5300-P04- Existing & Proposed Lime Silo Ele	PDF	431.08KB	VIEW	DOWNLOAD
	019784-RPS-PS-GF-DR-A-5000-P05- Proposed Primary Storage Site Lay	PDF	464.75KB	VIEW	DOWNLOAD
	019784-RPS-PS-XX-DR-A-5200-P04- Proposed Primary Storage Sections	PDF	442.31KB	VIEW	DOWNLOAD
	019784-RPS-PS-XX-DR-A-5300-P05- Proposed Primary Storage Elevatio	PDF	1.27MB	VIEW	DOWNLOAD
	019784-RPS-PS-XX-DR-A-5301-P05- Proposed Primary Storage Elevatio	PDF	1.27MB	VIEW	DOWNLOAD
	019784-RPS-RU-00-DR-A-5000-P02- Existing Rail Unloading Ground Fl	PDF	163.55KB	VIEW	DOWNLOAD
	019784-RPS-RU-00-DR-A-5002-P03- Proposed Rail Unloading Ground Fl	PDF	357.72KB	VIEW	DOWNLOAD
	019784-RPS-RU-01-DR-A-5001-P02- Existing Rail Unloading Roof Plan	PDF	284.06KB	VIEW	DOWNLOAD
	019784-RPS-RU-01-DR-A-5003-P03- Proposed Rail Unloading Roof Plan	PDF	266.12KB	VIEW	DOWNLOAD
	019784-RPS-RU-XX-DR-A-5200-P02- Sections Through Rail Unloading E	PDF	318.89KB	VIEW	DOWNLOAD
	019784-RPS-RU-XX-DR-A-5300-P02-	PDF	125.88KB	VIEW	DOWNLOAD

USKMOUTH POWER STATION PLANNING APPLICATION

USKMOUTH DRAFT PLANNING APPLICATION DRAWINGS

	019784-RPS-RU-XX-DR-A-5200-P02- Sections Through Rail Unloading E	PDF	318.89KB	VIEW	DOWNLOAD
	019784-RPS-RU-XX-DR-A-5300-P02- Existing Rail Unloading External	PDF	235.88KB	VIEW	DOWNLOAD
	019784-RPS-RU-XX-DR-A-5302-P03- Proposed Rail Unloading Elevation	PDF	952.06KB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5000-P05-Site Location Plan	PDF	955.67KB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5001-P04-Site Boundary	PDF	1.91MB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5002-P06- Existing SUP Site Plan	PDF	1.02MB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5003-P07- Proposed SUP Site Plan	PDF	1.26MB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5200-P04- Proposed Site Sections Sheet 1	PDF	1.18MB	VIEW	DOWNLOAD
	019784-RPS-SI-ZZ-DR-A-5201-P04- Proposed Site Sections Sheet 2	PDF	1.64MB	VIEW	DOWNLOAD

APPENDIX B – PRE APPLICATION CONSULTATION PRESS COVERAGE

South Wales Argus
29th May

Have your say on Uskmouth Power Station green energy plans

By [Emily Gill](#) Local Democracy Reporter



Uskmouth Power Station.

RESIDENTS will be able to have their say on plans to make a Newport power station greener.

A pre-application consultation on Uskmouth Power Station will start on Monday, June 1, and will run until June 29.

The owner and operator of the power station, SIMEC Atlantis Energy, said the plans include upgrading the current power station, adding another building to the site, and extending the rail unloading facility to allow for fuel pellets to be offloaded by rail.

The company has already applied for an environmental permit to convert the coal-fired facility to run on waste pellets.

The waste pellets would be composed of about 50 per cent plastic and 50 per cent material such as paper, cardboard and wood.

However, the application won't be without opposition.

Natural Resources Wales (NRW) has already held a consultation on the plans and the Campaign for the Protection of Rural Wales (CPRW) has said they have submitted two objections.

CPRW is a charity that aims to secure the protection and improvement of the countryside in Wales.

In their objection CPRW said: "The entire idea of reopening a power station as an Energy from Waste incinerator on this site is misconceived."

They said: "It is pointless to close coal-fired power stations to save us from global warming if we then reopen them using fuel which emits even more carbon."

"Why should waste generated in many other parts of the UK be transported to Newport and effectively disposed of by being transmitted as an aerosol along the Severn Estuary in SE Wales?

"Simply because most of these pollutants cannot be seen by the naked eye does not mean that they have disappeared."

For more information or to view the pre-application documents visit simecatlantia.com/uskmouth-power-station-planning-application/

---END---

Developers want to convert this coal-fired power station to run on waste pellets

Uskmouth Power Station in Newport would be converted to operate as a power plant generating electricity through the combustion of waste derived fuel pellets



Uskmouth Power Station (Image: Andrew Hazard)

Developers have revealed details of an ambitious plan to convert a coal-fired power station into a sustainable energy producer.

The project proposes to convert the existing coal-fired power plant at Uskmouth Power Station, near Newport, to operate as a plant which would generate electricity through the combustion of waste derived fuel pellets.

SIMEC Atlantis Energy said the waste pellets would be composed of about 50% plastic and 50% material such as paper, cardboard and wood.

The company is seeking planning permission from Newport City Council to build silos, conveyors, a de-dusting plant, an extension to the rail unloading shed and other developments on the site.

SIMEC Atlantis Energy has said the evolution of the design has sought to address potential environmental impacts.

It is proposed that fuel pellets will be transported to the Uskmouth project site via rail from fuel production plants currently under development in England.

Following on from Welsh Government advice regarding PAC requirements during Covid-19 restrictions, the Uskmouth Conversion Project PAC will be hosted online on the Simec Atlantis Energy website.

---END---

APPENDIX C – COPIES OF INVITATION, ONLINE PRESENTATION, QUESTIONS AND RESPONSES



INVITATION TO USKMOUTH CONVERSION PROJECT - PLANNING

ONLINE PRESENTATION 13.30 to 14.30 on Thursday 25th June

Dear Local Resident

SIMEC Atlantis Energy Limited, owners of Uskmouth Power Station seek to convert the existing coal fired Power Station to generate electricity through the combustion of waste derived fuel pellets.

Uskmouth Power Station is applying for Planning Permission for the construction of the Proposed Development; Fuel storage silos, conveyors, de dusting plant, extension to rail unloading shed and ancillary development.

We are presently hosting a 28 day Pre Application Consultation (PAC) which runs from Monday 1st June to Monday 29th June. Public Notices have been placed around the village.

The Uskmouth Power Station Projects Team invites you to an online presentation during which we will talk through the planning posters hosted on our website.

Please type the link below into your web browser, here you will find an option to join Teams (if you have it installed) alternatively, you can watch on the web :

link.simecatlantis.com/Uskmouth

You will have the opportunity to submit questions via text to the Projects Team during the presentation.

The Pre Application Consultation documents are available on line
www.simecatlantis.com/uskmouth-power-station-planning-application/

You are welcome to provide comments to our proposal via email planning@simecatlantis.com .

After the Pre Application Consultation (PAC) has concluded, we will prepare a PAC Report collating all responses we received via post or email planning@simecatlantis.com. The PAC report will then be submitted to Newport City Council (NCC) alongside the full planning application.

NCC will then conduct a further consultation when you will have the opportunity to provide comments direct to NCC during their consultation.

We look forward to your feedback

Regards

Uskmouth Power Station

-----END-----



23rd June 2020

Addresses of houses issued with planning presentation invitations: -

All along full length of West Nash Road

Nash Road / Goldcliff Road, From the junction of Pye Corner and Saltmarsh Lane

All houses on of Farm Field Road

All houses on St Mary Road

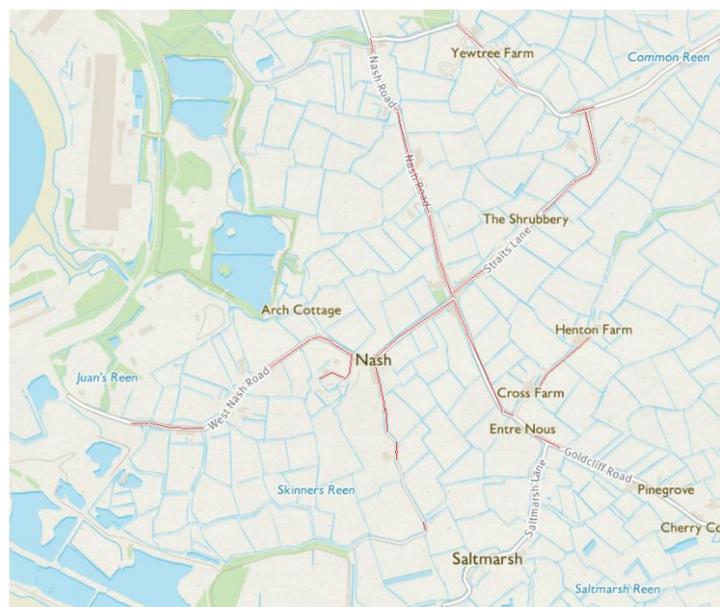
All houses along Straits Lane

All houses on Henton Road

All houses on Saltmarsh Lane

Broad Street Common, from the junction Pye Corner and Straits Lane.

Hand delivered by Uskmouth Power Station Staff .



---END---



SIMEC ATLANTIS
ENERGY

USKMOUTH CONVERSION PROJECT



USKMOUTH
POWER STATION



Welcome

SIMEC Atlantis Energy Limited, global developer of renewable and sustainable energy projects, presents the Uskmouth Conversion Project

The Uskmouth Conversion Project seeks to convert the existing coal fired Uskmouth Power Station to operate as a power plant which would generate electricity through the combustion of waste derived fuel pellets.

Planning permission is sought for construction of the Proposed Development; silos, conveyors, de-dusting plant, extension to rail unloading shed and ancillary development.

The 28 day Pre Application Consultation (PAC) runs from Monday 1st June to Monday 29th June.

PAC documents are available on line: www.simecatlantis.com/uskmouth-power-station-planning-application/.

You are welcome to provide comments to our proposal via email planning@simecatlantis.com.

After the Pre Application Consultation (PAC) has concluded, we will prepare a PAC report collating all the responses we received. The PAC report will then be submitted to Newport City Council (NCC) alongside the full planning application.

NCC will then conduct a further consultation and you will have the opportunity to provide comments direct to NCC during their consultation.

FUEL PELLETS

Fuel pellets are produced by pellet supplier in line with rigorous fuel specification bespoke to the Uskmouth Power Station.



RAIL DELIVERIES

Fuel pellets are delivered to Uskmouth Power Station from the pellet supplier on the existing rail connection and deposited into rail offloading.



Each unit require 2 trains per day.

SILO STORAGE

Fuel pellets are stored on site in storage silos and conveyed into the main power station building.



Each unit requires up to 1600 Tonnes of fuel pellets per day.

220MW PRODUCED

The fuel pellets are milled and combusted to generate electricity. Emissions to air are in line with Environmental Permit Regulations.



Each unit generates 110 MW electrical energy.

Uskmouth Conversion Project

SUSTAINABILITY

SUSTAINABLE FUEL



Generating electricity from fuel pellets derived from non recyclable waste which would have otherwise been sent to waste incinerators or landfill.

LOWER EMISSIONS



Fuel pellets contain 50% biogenic waste; paper, card and wood with net zero carbon emissions.

REUSE OF EXISTING INFRASTRUCTURE



Conversion of an existing power station and upgrade of existing railway access to transport the fuel pellets. Energy saving when compared to a new build.

LOCAL ECONOMIC BENEFITS

CREATION AND RETENTION OF LOCAL JOBS



Conversion of the Uskmouth Power Station creates and retains employment in the local area during construction, operation and within the supply chain.

OPPORTUNITY FOR EXPANSION OF LOCAL INDUSTRIES



Uskmouth plans to sell affordable and sustainable electricity direct to local industry supporting opportunities for job creation and local economic growth.

WIDER ECONOMIC BENEFITS

"ON DEMAND" GENERATION



Uskmouth produces electricity when it is needed, supporting renewable energy expansion.

BLUEPRINT FOR MORE CONVERSIONS



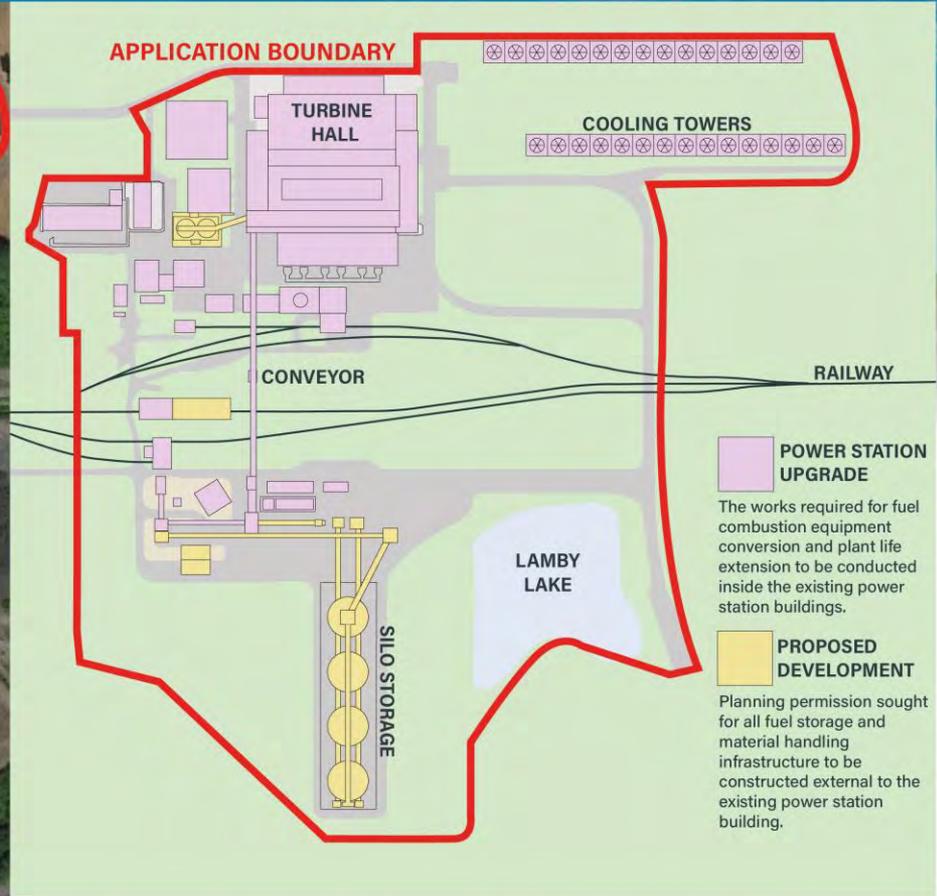
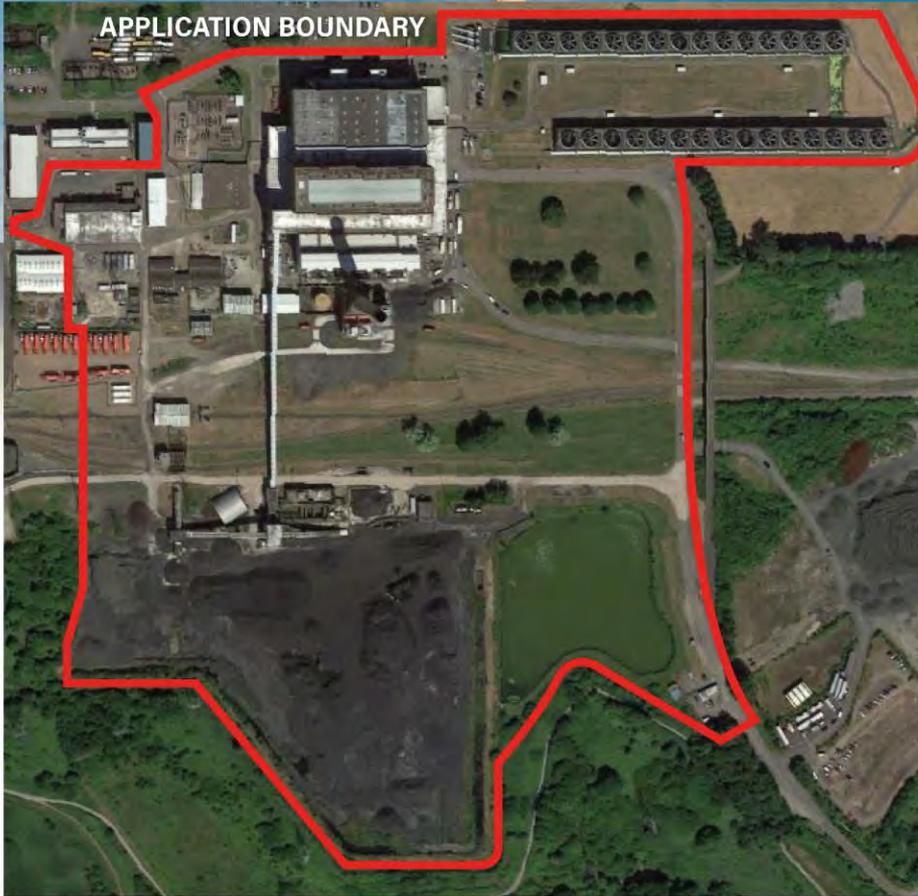
By proving that a new sustainable fuel can displace coal, Uskmouth can stimulate the life extension of other UK coal fired power stations.

ENERGY SECURITY



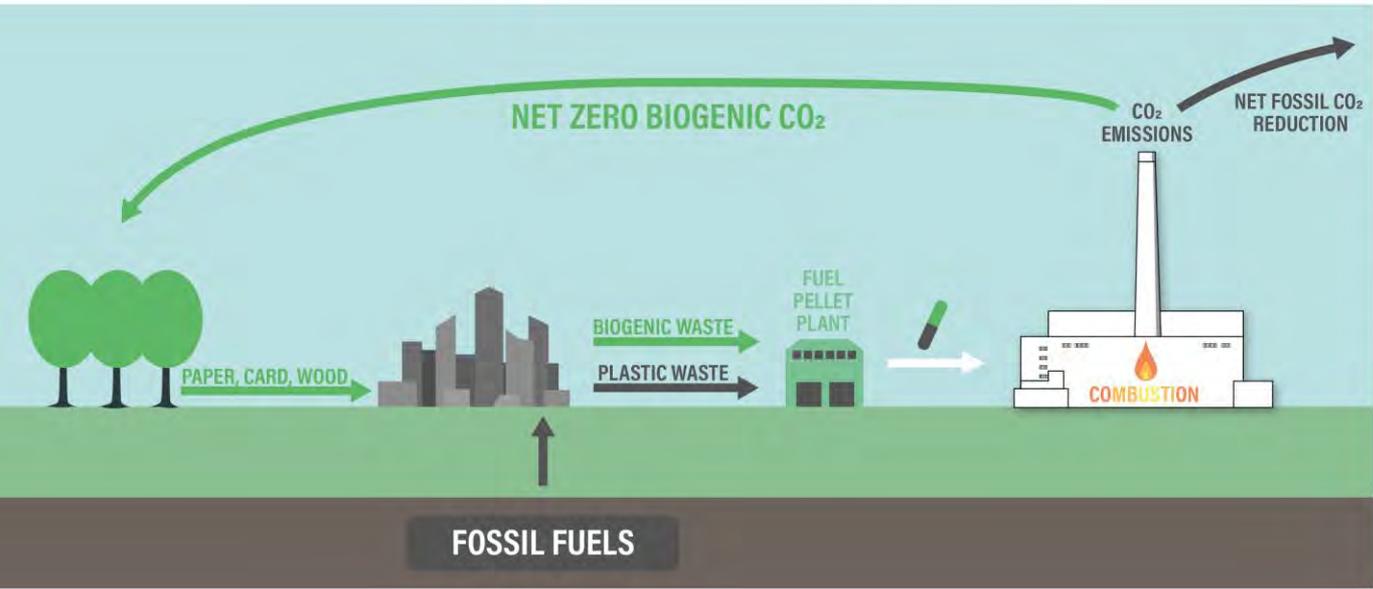
Generate enough electricity to reliably power up to 500,000 homes per year for another 20 years.

Proposed Development

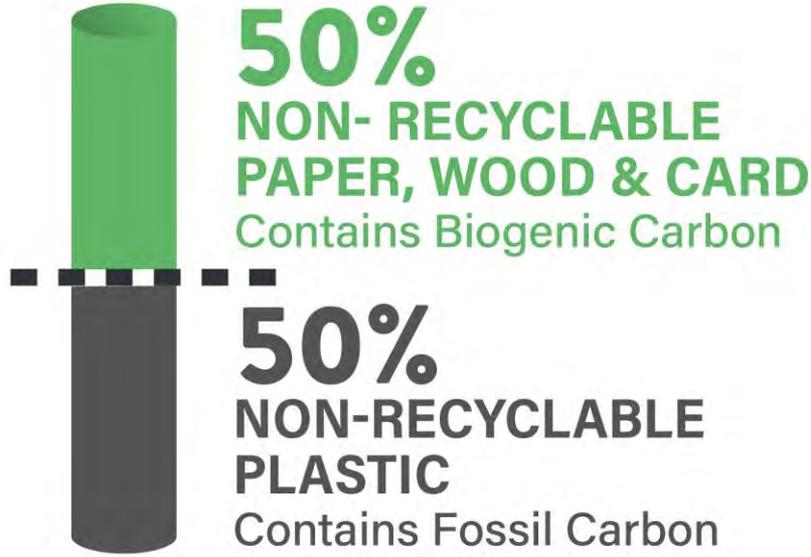


Design and Planning	Requirements	Construction - 18 months	Operation - 20 years
Permit Variation Application to combust fuel pellet is submitted to Natural Resources Wales (NRW)	Environmental Permit with revised Emission Limit Values from NRW	Power Station Upgrade complies with Emission Limit Values within the Environmental Permit	Power Station Upgrade and Proposed Development is complete. Uskmouth Conversion Project enters the operational phase to generate electricity from combustion of fuel pellets.
Planning permission is sought for external infrastructure. Environmental Impact Assessment considers construction and operation of Uskmouth Conversion Project	Planning permission from Newport City Council (NCC)	Proposed Development constructed within the envelope of the planning permission	

Fuel Pellets



Present day recycling techniques cannot recycle all waste materials and there remains a significant quantity of waste material sent for disposal in landfill, purpose-built energy from waste facilities or exported. It is this non-recyclable waste that is used as feedstock for the fuel pellets.



CO ₂ EMISSIONS	
Biogenic carbon derived from biological sources	Fossil carbon derived from geological sources
Paper, wood and card sourced from societal waste not from deforestation	Plastics with high calorific content sourced from societal waste not mining of fossil fuels
Combustion results in net zero carbon emissions	Combustion results in carbon emissions

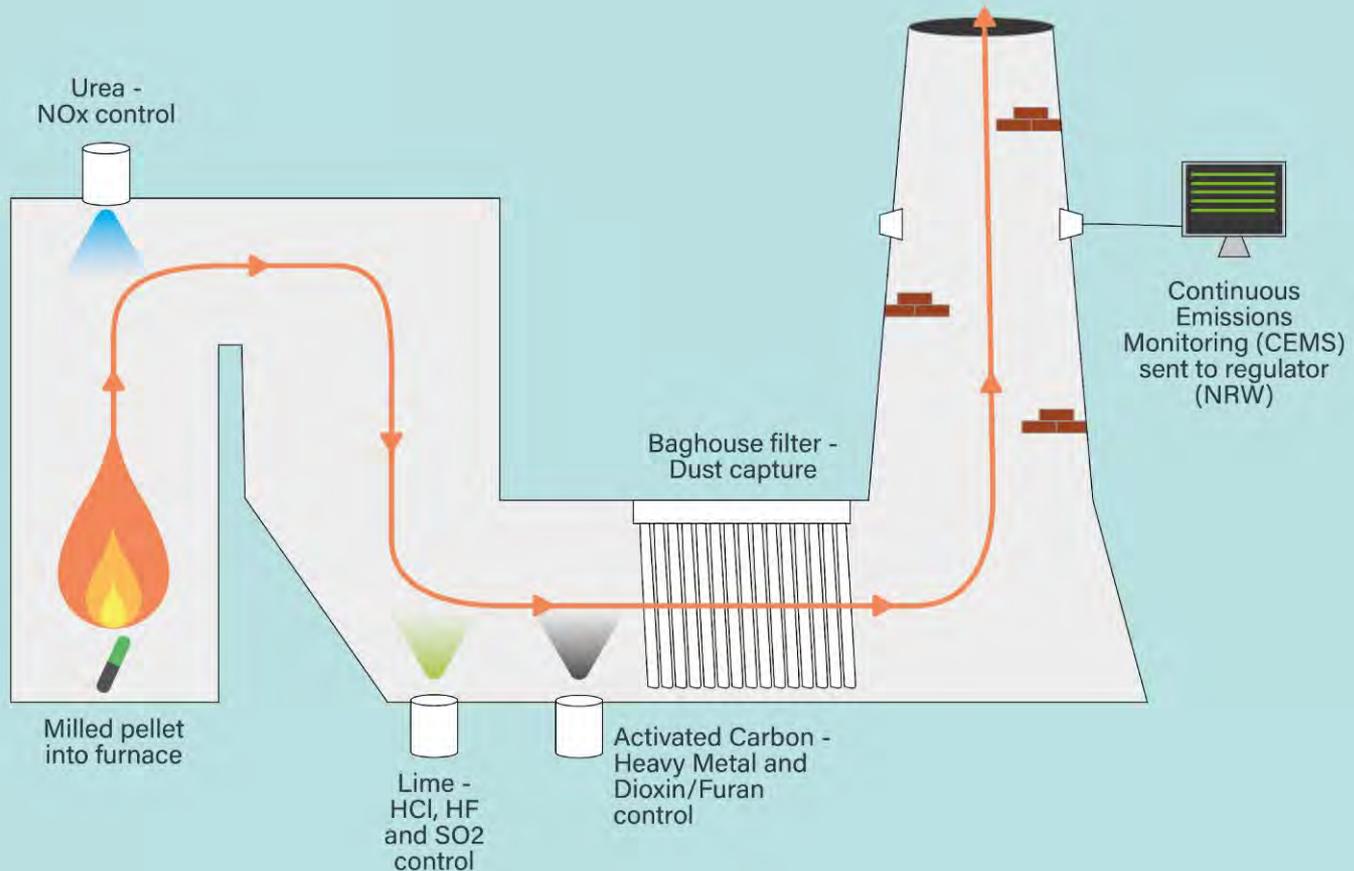
Emissions Control

Fuel pellets are manufactured in accordance with a bespoke fuel specification.

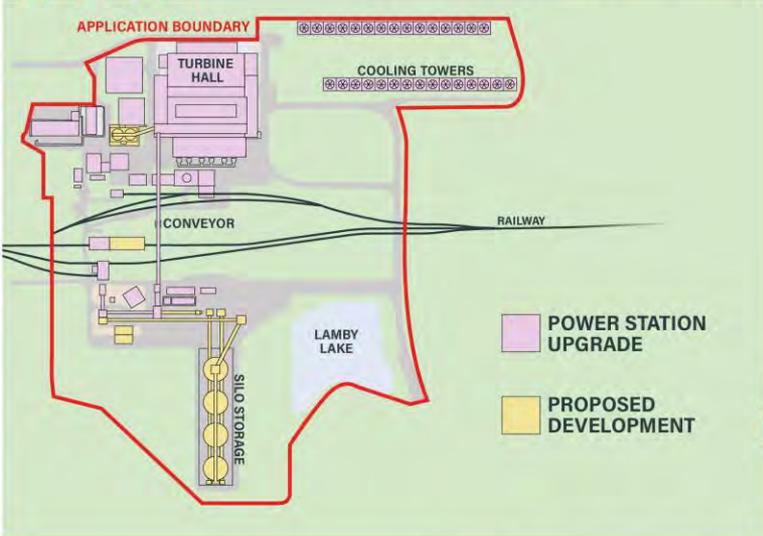
Constituents that give rise to emissions during combustion are limited in the fuel pellet production by strict quality control measures.

An Environmental Permit variation application submitted to Natural Resources Wales seeks to permit the combustion of fuel pellets in line with stringent Emission Limit Values.

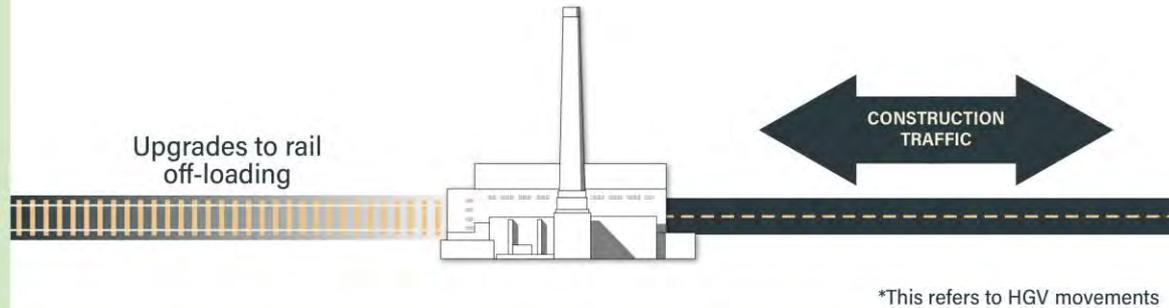
The cleaned flue gases with emission concentrations less than NRW Environmental Permit limits are then emitted through the 120m stack.



CONSTRUCTION PHASE

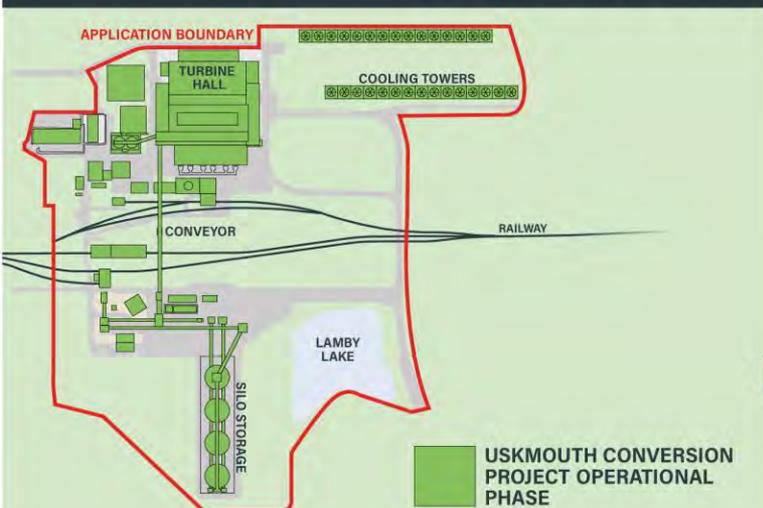


During construction, we expect up to
30 daily movements = 15 arriving + 15 departing

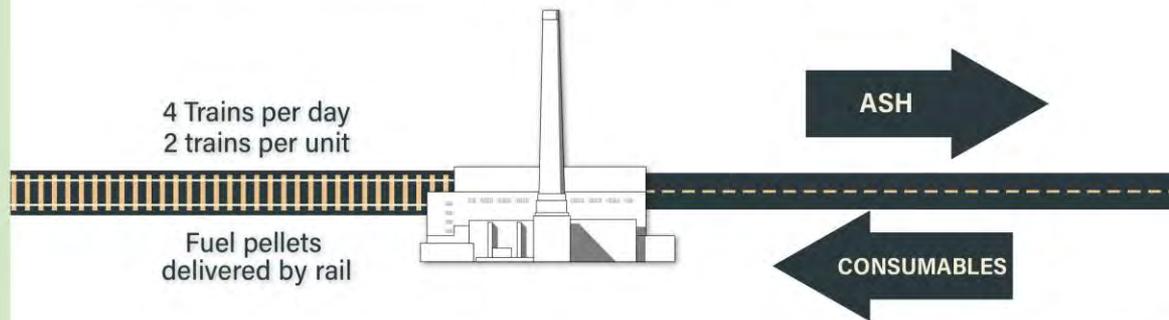


*This refers to HGV movements

OPERATIONAL PHASE



During operation, we expect up to
60 daily movements = 30 arriving + 30 departing



*This refers to HGV movements

Landscape and Visual Impact

FUTURE VIEW FROM
ACROSS THE RIVER USK

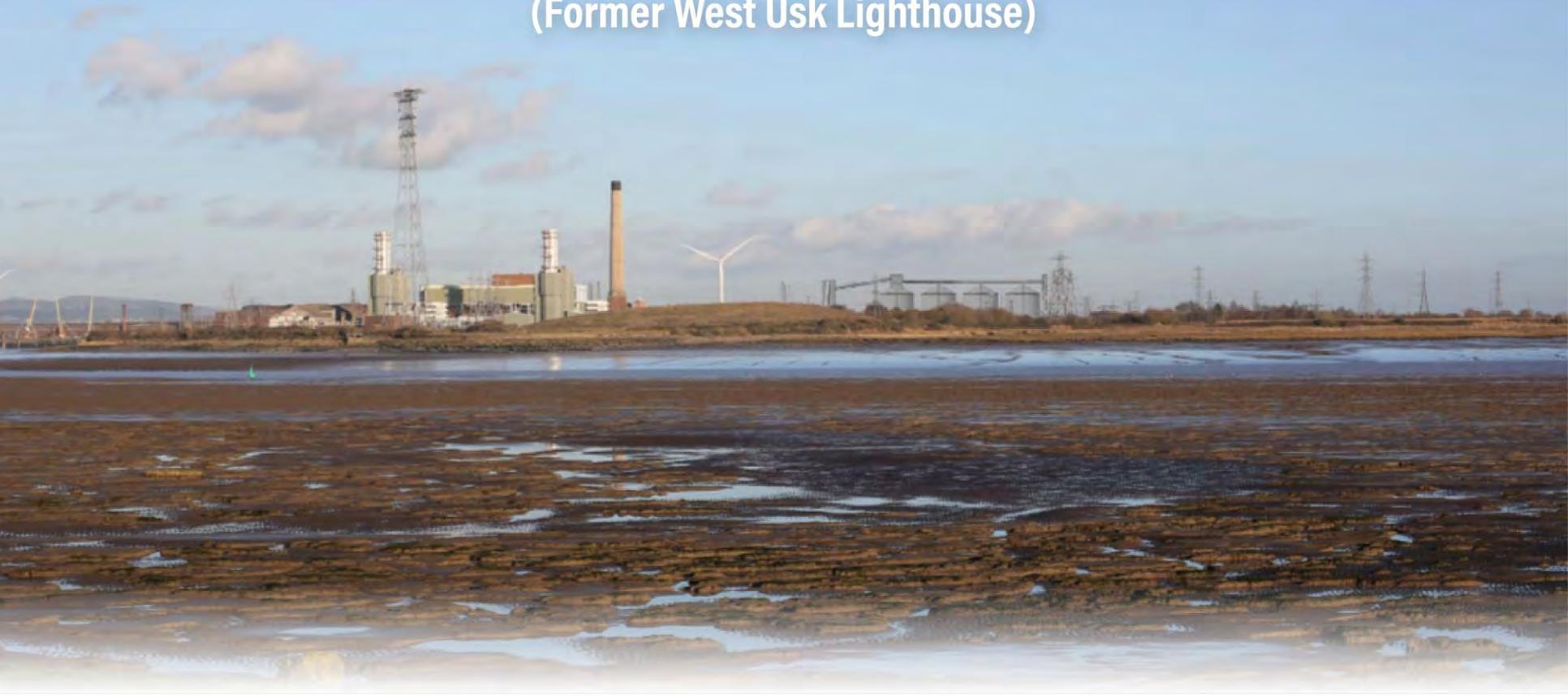
FUTURE VIEW FROM
WEST NASH ROAD

FUTURE VIEW FROM
NEWPORT WETLANDS



Visual Impact

View from Wales Coast Path (Former West Usk Lighthouse)



What will the Uskmouth Power Station look like post conversion?

The main visual difference post conversion would be the Proposed Development which consists of all fuel storage and material handling infrastructure to be constructed external to the existing power station building.

The Power Station Upgrade entails works internal to the existing Uskmouth Power Station buildings that would not have a visual impact

We will employ an appropriate lighting scheme during hours of darkness.

Visual Impact

View from West Nash Road



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The Power Station Upgrade entails works internal to the existing Uskmouth Power Station buildings that would not have a visual impact

We will employ an appropriate lighting scheme during hours of darkness.

Visual Impact

View from Wales Coast Path (Newport Wetlands NNR)



What will the Uskmouth Power Station look like post conversion?

The main visual difference post conversion would be the Proposed Development which consists of all fuel storage and material handling infrastructure to be constructed external to the existing power station building.

The Power Station Upgrade entails works internal to the existing Uskmouth Power Station buildings that would not have a visual impact

We will employ an appropriate lighting scheme during hours of darkness.

Air Quality

A detailed air quality assessment predicting the potential effects of emissions generated during the construction and operation of the Uskmouth Conversion Project has been undertaken. Overall the air quality effects of the Uskmouth Conversion Project, are not considered to be significant.

Population & Health

It is not anticipated that there would be any significant population and health effects resulting from the construction or operation of the Uskmouth Conversion Project.

Noise & Vibration

Noise and vibration effects during construction are considered temporary and of negligible to minor adverse significance. During operation the noise and vibration effects are considered long term and negligible adverse significance.

Ecology

We conducted a one year baseline terrestrial ecology study at Uskmouth Power Station. The individual ecology species survey reports are appended to the Environmental Statement (ES). The ES concluded that all impacts on nature conservation designations and habitats during construction and operation of Uskmouth Conversion Project are negligible.



USKMOUTH CONVERSION PROJECT



Thank you for listening
Do you have any questions?



Thank you for your time today

SIMEC Atlantis Energy Limited, owners of Uskmouth Power Station seek to convert the existing coal fired Power Station to generate electricity through the combustion of waste derived fuel pellets.

Planning permission is sought for construction of the Proposed Development; fuel storage silos, conveyors, de-dusting plant, extension to rail unloading shed and ancillary development.

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After the Pre Application Consultation (PAC) has concluded, we will prepare a PAC report collating all the responses we received. The PAC report will then be submitted to Newport City Council (NCC) alongside the full planning application.

NCC will then conduct a further consultation and you will have the opportunity to provide comments direct to NCC during their consultation.



The following document captures the responses to questions from local residents during the online presentation hosted on 25/06/2020.

Moderator 6/25/2020 1:58 PM

Please feel free throughout the presentation to submit and questions you may have using the 'ask a question' function at the right hand side of your screen.

1. Question from anonymous user 6/25/2020 2:06 PM

Why do we need the power station? its been redundant for many years and we've managed without it.....today within a stones throw from Uskmouth there are 5 wind turbines. Only 3 out of 5 are moving, so why do we need more electricity when were not using the already built electricity producing "green" turbines

USKMOUTH RESPONSE: The Uskmouth Conversion Project intends to contribute to the UK being able to meet the continuing need for underlying 'on demand' generation which is required to complement generation from intermittent renewable energy sources. Many renewable energy sources cannot be accurately predicted, and we do not currently have the infrastructure to store electricity at large scale to even out differences in generation and demand. Therefore, we need to extend the life of some power stations (or build new ones) which can produce electricity when it is needed. Undertaking this conversion means the power station can work alongside increasing generation from intermittent renewable sources to help make sure demand can be met.

Uskmouth intends to contribute to UK energy security and the anticipated future increase in electricity demand to 2050 by meeting the continuing need for underlying baseload or 'on demand' generation. Technology has not yet provided a solution to large scale electricity storage to even-out differences in generation and demand. Therefore, there is an ongoing requirement for power stations to provide (baseload) electricity when it is needed. The Uskmouth conversion would provide baseload electricity alongside increasing generation from intermittent renewable sources to ensure that increasing UK electricity demand can be met during this transition towards decarbonisation

2. Question from anonymous user 6/25/2020 2:15 PM

In the summer we have approx 1000 visitors to the wetlands weekly, the local farming community are busy with crops, cyclists are constantly using the lanes around nash and welsch water have approx 100 lorries a day using the treatment plant. How do you think us locals are going to cope with all your extra hgv's during construction and especially once operational? A table was produced a while back on your transport figures and it was stated more than the 60 hgvs youve just stated

USKMOUTH RESPONSE:

The Uskmouth Conversion seeks to replicate previous operational transport with fuel delivered by rail and operational consumables to site by road and ash exported from site by road. Traffic and Transport is assessed in Chapter 10. To ensure a robust assessment, this assessment has compared the future operational baseline year (2026), taking into account other schemes that are likely to affect the future baseline conditions, against a scenario which includes the Uskmouth Conversion Project.



The traffic numbers take into account the traffic to Newport Wetlands

This baseline position does not include for any power generation at Uskmouth Power Station and therefore the baseline position does not include for any HGV movement associated with such. This represents a robust assessment. If the baseline position was to include HGV movements associated with power generation at Uskmouth Power Station, then such HGV movement would be similar to those which are subject to this assessment and this application. Such a baseline scenario would mean that this application would result in no net change in HGV movements along the access route. The construction assessment for Uskmouth Conversion Project is based on a reasonable worst case scenario which considers the construction traffic associated with; the Proposed Development and Power Station Upgrade over 18 months. Construction traffic estimates have been made on for a construction period of 18 months, and ensures a robust assessment with peak construction activity 15HGV's into site and 15 HGV's leaving site – 30 daily movements .

A peak of up to 157 staff vehicles are anticipated to be on site during the peak construction period, which coincides with the peak HGV movements through the 18-month construction period, During operation a maximum 30 HGV's into site and 30 HGV's leaving site – 60 daily movements . The Transport Assessment considered ; severance, Driver Delay, Pedestrian Delay , Pedestrian Amenity, Accidents and Safety and concluded that the impact for construction and operation traffic would not be significant in EIA terms

3. Question from anonymous user 6/25/2020 2:22 PM

Any reason why you cant use another transport route

USKMOUTH RESPONSE: The Uskmouth Conversion seeks to replicate previous operational transport with fuel delivered by rail and operational consumables to site by road and ash exported from site by road.

In January 2019 in the initial stages of the design development, the projects for (1) the conversion of USKMOUTH and (2) the pelleting producing facility were progressed by two separate companies . The pelleting plant, this was considered for the northern part of the Uskmouth Power Station site, north of the existing road overpass and either side of the railway leading to the Uskmouth site. Road access through the adjoining Liberty Steel Newport (LSN) site was proposed. The new road through LSN linking up with Corporation Road further to the north was to be progressed by a separate project team.

The screening opinion provided by NCC in October 2018 highlighted significant road congestion and air quality deterioration resulting from the HGV's importing circa 533,871 tonnes per annum of non-recyclable waste and exporting of circa 218,081 tonnes of unsuitable waste. Thereby generating circa 117 daily HGV movements through Lysaght Junction Corporation Road LSN access road.

The cancellation of the M4 Corridor around Newport project also made delivery of waste to and from the proposed pellet plant site via road less attractive. By late 2019 the decision was made to develop the pelleting plants at locations in the UK and transport the fuel to Uskmouth Power Station via rail, replicating previous operational activity of coal by rail. By late 2019 plans for the LSN Access Road had also been cancelled

4. Question from anonymous user 6/25/2020 2:25 PM

Our properties are already getting damaged due to a small amount of hgv movement from welsh water. We've ongoing communications with welsh water over claims for property damage. Is it a case of us residents making claims against your company too in the future?



USKMOUTH RESPONSE: Chapter 11 of assesses noise and vibration effects that could arise from the construction, operation of the Uskmouth Conversion Project .Uskmouth Power Station do not anticipate that there will be any negative impacts associated with the road transport related to construction and operation .

5. Question from anonymous user 6/25/2020 2:28 PM

Where can I obtain a copy of the screening report

USKMOUTH RESPONSE: Screening report is on the NCC Planning portal The screening opinion is available on Newport City Council (NCC) planning portal, application number 19/1313. If you email me I can send you a copy

6. Question from anonymous user 6/25/2020 2:29 PM

What happens to the ash from the site and where is it transported to

USKMOUTH RESPONSE: Uskmouth Power Station is actively investigating processes to recycle the ash as an industrial aggregate. In the event that this is not feasible out of the 100% volume of waste converted into fuel pellets only 15% of the waste volume would be deposited into landfill after combustion to create electricity within a repurposed power station.

---END---

:

**APPENDIX D – COPY OF SITE NOTICE AND
DECLARATION**

SCHEDULE 1D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION: NOTICE TO BE GIVEN DURING EMERGENCY PERIOD

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PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D AS MODIFIED BY ARTICLE 2G

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is intending to apply for planning permission for: **Erection of silos and de-dusting building, extension to rail unloading facility, new above ground conveyors and ancillary development**

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

online at: www.simecatlantis.com/uskmouth-power-station-planning-application/

If you are unable to access the documents electronically you may request copies of this information by emailing: planning@simecatlantis.com or by telephoning: **01633 292 700 (Option 1 security and planning enquiries)**.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent: at:

**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

ATODLEN 1D

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO: HYSBYSIAD I'W ROI YN YSTOD CYFNOD YR ARGYFWNG

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

HYSBYSIAD O DAN ERTHYGLAU 2C A 2D FEL Y'U HADDASWYD GAN ERTHYGL 2G

(i'w gyflwyno i berchnogion a/neu feddianwyr tir cyffiniol ac ymgylgoreion cymunedol; ac i'w arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir gennych wrth ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Datblygiad Arfaethedig yn: **Gorsaf Bwer Uskmouth B, Heol West Nash, Nash, Casnewydd NP18 2BZ**

Rwyf yn hysbysu bod: **SIMEC Uskmouth Power Limited**

yn bwriadu gwneud cais am ganiatâd cynllunio i ddatblygu: **Codi seilos ac adeilad dad-lwch, estyniad i gyfleuster dadlwytho rheilffyrdd, cludwyr newydd uwchben y ddaear a datblygiad ategol**

Gellwch archwilio copïau o'r canlynol:

- y cais arfaethedig;
- y planiau; a
- dogfennau ategol eraill

ar-lein yn: www.simecatlantis.com/uskmouth-power-station-planning-application/

Os nad ydych yn gallu cael mynediad at y dogfennau yn electronig gallwch ofyn am gopïau o'r wybodaeth hon drwy anfon e-bost at: planning@simecatlantis.com neu drwy ffonio'r ceisydd/asiant ar **01633 292 700 (Option 1 security and planning enquiries)**.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn a'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant at:

**C/O Planning
Gorsaf Bwer Uskmouth
Heol West Nash
Casnewydd
NP18 2BZ**

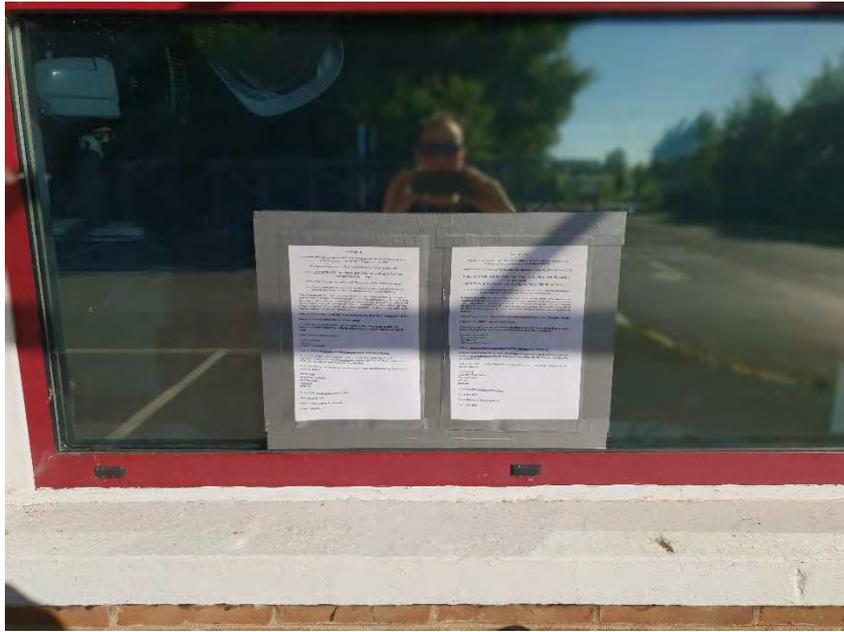
neu ebostiwrch: planning@simecatlantis.com

erbyn: **29 Mehefin 2020**

Llofnod: **RPS Consulting UK & Ireland**

Dyddiad: **1 Mehefin 2020**

PAC NOTICE LOCATION EVIDENCE



SECURITY GATEHOUSE 30/05/2020 10:50am



COASTAL PATH ENTRANCE 30/05/2020 10:55am

PAC NOTICE LOCATION EVIDENCE



RSPB 30/05/2020 11:00am



BUS STOP VILLAGE HALL 30/05/2020 11:05am

PAC NOTICE LOCATION EVIDENCE



BUS STOP WEST NASH RD JUNCTION 30/05/2020 11:10am



NASH ROAD 30/05/2020 11:15

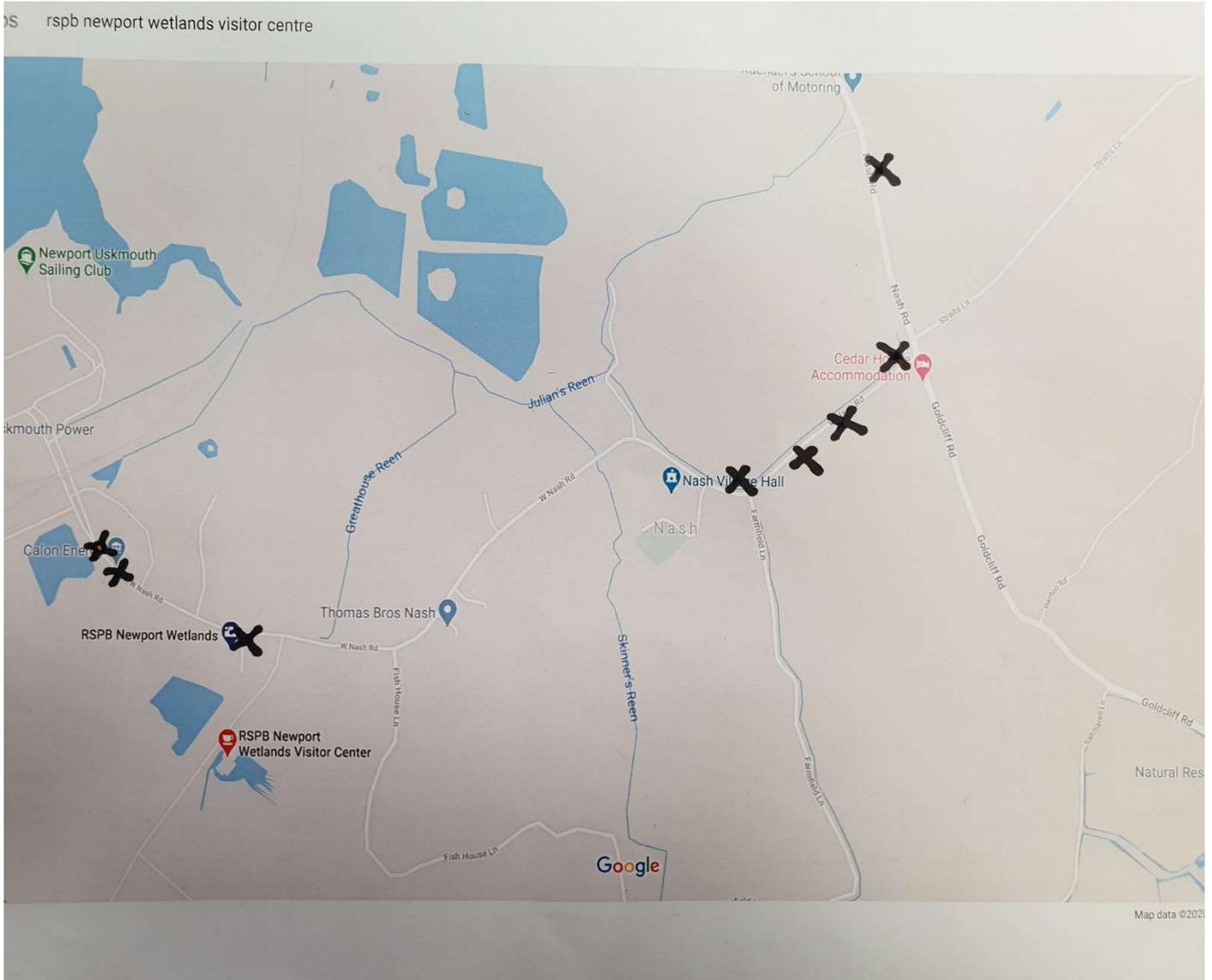


WEST NASH ROAD 30/05/2020 11:20am



WEST NASH ROAD 30/05/2020 11:25am

PAC LOCATION MAP



I, Dafydd Williams, declare the Site Notices were displayed in accordance with the statutory requirements for a minimum of 28 days.

Signed: *D S Williams*

Date: 13th August 2020

**APPENDIX E – ADJOINING OWNER/OCCUPIERS AND
COUNCILLORS NOTIFIED, COPY OF THE NOTICES AND
LETTERS**



Table 1: Adjoining Owner or Occupiers

Contact name (if known)	Address
Mr R Steed	Liberty Steel Newport, Corporation Road, Newport, NP19 4XE
Mr C Davies	Bird Port, Corporation Road, Newport, NP19 4RE
	Dwr Cymru Cyfyngedig / Welsh Water Limited, Pentwyn Road, Nelson, Treharris, Mid Glam CF46 6LY
Mr M Phelps	Nash Sewage Treatment Works, West Nash Road, Nash, Newport, NP18 2YH
Mr I King	Severn Power, Calon Energy Limited, West Nash Rd, Nash, Newport NP18 2BZ
Mr P K Gupta	Simec Power 4 (SP4), Birdport, Corporation Road, Newport, NP19 4RE
	RSPB Newport Wetlands, West Nash Road, Nash, Newport NP18 2BZ
The Commodore	Newport (Uskmouth) Sailing Club, West Nash Road, Nash, NEWPORT, NP18 2BZ

Table 2: Community Consultees

Consultee	Name	Address
The community council	Nash Community Council	C/o Clerk - Mr Tony Ducroq, Llwynderw, Broadstreet Common, Nash, Newport, NP18 2BE
Local member	Roger Jeavons (Labour)	c/o Newport City Council, Civic Centre, Newport, NP20 4UR
Local member	John Richards (Labour)	c/o Newport City Council, Civic Centre, Newport, NP20 4UR
Local member	Allan Morris (Independent)	c/o Newport City Council, Civic Centre, Newport, NP20 4UR
Local member	Ken Critchley (Labour)	c/o Newport City Council, Civic Centre, Newport, NP20 4UR

Date: 29 May 2020

Simec Power 4 (SP4)
GUPTA
Parduman Kumar
Birdport
Corporation Road
Newport
NP19 4RE

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
Ganiatâd Cynllunio Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli
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In accordance with the above please find enclosed Notice relating to a proposed planning application / *Yn unol â'r uchod, amgaeaf Hysbysiad i ymwneud a cais cynllunio arfaethedig.*

Should you require any clarification please do not hesitate to contact me / *Os bydd angen eglurhad arnoch mae croeso i chi gysylltu â mi.*

Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION:
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PERMISSION
NOTICE UNDER ARTICLES 2C AND 2D AS MODIFIED BY ARTICLE 2G

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Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

The Commodore
Newport (Uskmouth) Sailing Club
West Nash Road
Nash
Newport
NP18 2BZ

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

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Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

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Uskmouth Power Station
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Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Mr M Phelps
Nash Sewage Treatment Works
West Nash Road
Nash
Newport
NP18 2YH

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

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2 Callaghan Square
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2 Callaghan Square
Cardiff
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Dwr Cymru Cyfyngedig
Pentwyn Road
Nelson
Treharris
Mid Glamorgan
CF46 6LY

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If you are unable to access the documents electronically you may request copies of this information by emailing: planning@simecatlantis.com or by telephoning: **01633 292 700 (Option 1 security and planning enquiries)**.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent: at:

**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Mr C Davies
Bird Port
Corporation Road
Newport
NP19 4RE

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
Ganiatâd Cynllunio Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli
Datblygu) (Cymru) 2012**

In accordance with the above please find enclosed Notice relating to a proposed planning application / *Yn unol â'r uchod, amgaeaf Hysbysiad i ymwneud a cais cynllunio arfaethedig.*

Should you require any clarification please do not hesitate to contact me / *Os bydd angen eglurhad arnoch mae croeso i chi gysylltu â mi.*

Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams

Associate / *Cydymaith*

dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION: NOTICE TO BE GIVEN DURING EMERGENCY PERIOD

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D AS MODIFIED BY ARTICLE 2G

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Proposed development at: **Uskmouth B Power Station, West Nash Road, Nash, Newport NP18 2BZ**

I give notice that: **SIMEC Uskmouth Power Limited**

is intending to apply for planning permission for: **Erection of silos and de-dusting building, extension to rail unloading facility, new above ground conveyors and ancillary development**

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Mr R Steed
Liberty Steel Newport
Corporation Road
Newport
NP19 4XE

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams

Associate / *Cydymaith*

dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Mr I King
Severn Power
Calon Energy Limited
West Nash Road
Nash
Newport
NP18 2BZ

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Datblygu) (Cymru) 2012**

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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION: NOTICE TO BE GIVEN DURING EMERGENCY PERIOD

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online at: www.simecatlantis.com/uskmouth-power-station-planning-application/

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Nash Community Council
C/o Clerk - Mr T Ducrocq
Llwynderw
Broadstreet Common
Nash
Newport
NP18 2BE

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantia.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Councillor R Jeavons
c/o Newport City Council
Civic Centre
Newport
NP20 4UR

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

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2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Date: 29 May 2020

Councillor J Richards
c/o Newport City Council
Civic Centre
Newport
NP20 4UR

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1D

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Our Ref: 200529-L-JPW1248-DW-PACNeighbComm-v0



Date: 29 May 2020

Councillor A Morris
c/o Newport City Council
Civic Centre
Newport
NP20 4UR

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

**Notice of Publicity and Consultation Before Applying for Planning Permission
Town and Country Planning (Development Management Procedure) (Wales) Order
2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Dafydd Williams
Associate / *Cydymaith*
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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

Our Ref: 200529-L-JPW1248-DW-PACNeighbComm-v0



Date: 29 May 2020

Councillor K Critchley
c/o Newport City Council
Civic Centre
Newport
NP20 4UR

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

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2012 / Hysbysiad o Cyhoeddusrwydd ac Ymgynghori Cyn Gwneud Cais am
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Dafydd Williams
Associate / *Cydymaith*
dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

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- the plans; and
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online at: www.simecatlantis.com/uskmouth-power-station-planning-application/

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**C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ**

or emailing: planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

**APPENDIX F – COPY OF SPECIALIST CONSULTEE
LETTER**



Date: 29 May 2020

Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
Cardiff
CF3 0EY

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dear sir or madam / *Annwyl syr neu madam,*

Request for a Pre-Application Consultation Response Under Article 2D of The Town And Country Planning (Development Management Procedure) (Wales) Order 2012 / Ddeisyfiad Ffurfiol am Ymateb i Ymgynghoriad Cynymgeisio o Dan Erthygl 2D O Orchymyn Cynllunio Gwlad A Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Please find enclosed a Schedule 1C Notice relating to a proposed Planning Application / *Amgaeaf hysbysiad Atodlen 1C sy'n ymwneud â cais cynllunio arfaethedig.*

Should you require any clarification, please do not hesitate to contact me / *Os bydd angen unrhyw eglurhad arnoch, cofiwch gysylltu â mi.*

Yours faithfully / *Yr eiddoch yn gywir*
for RPS Group Limited / *i Grwp RPS Cyfyngedig*



Dafydd Williams

Associate / *Cydymaith*

Dafydd.williams@rpsgroup.com

Enc: As above / *Fel uchod*

SCHEDULE 1C Article 2D
CONSULTATION BEFORE APPLYING FOR PLANNING
PERMISSION

Town and Country Planning (Development Management Procedure) (Wales) Order 2012
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning
(Development Management Procedure) (Wales) Order 2012

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at **Uskmouth B Power Station, West Nash Road, Nash, Newport NP18 2BZ.**

I give notice that **SIMEC Uskmouth Power Limited**

is intending to apply for planning permission for **Erection of silos and de-dusting building, extension to rail unloading facility, new above ground conveyors and ancillary development.**

A copy of the proposed application; plans; and other supporting documents are can be viewed online at:

www.simecatlantis.com/uskmouth-power-station-planning-application/

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the applicant/agent:

C/O Planning
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ
planning@simecatlantis.com

By: **29 June 2020**

Signed: **RPS Consulting UK & Ireland**

Date: **1 June 2020**

**APPENDIX G – COPY OF EIA SCREENING REPORT AND
OPINION**

Ask ior/Gofynnwch am

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NP20 4UR



Cara Donovan

Simec Atlantis

By email only

29 October 2018

Dear Ms Donovan

PROPOSAL: EIA SCREENING OPINION FOR PROPOSED DEVELOPMENT OF FUEL STORAGE SILOS, CONVEYOR SYSTEMS AND ACCESS TOGETHER WITH CONVERSION OF REPLACEMENT OF EQUIPMENT WITHIN EXISTING BUILDING ENVELOPES TO ENABLE COMBUSTION OR PELLETISED WASTE DERIVED FUEL AND OTHER BIOMASS FUEL AT USK MOUTH B POWER STATION

SITE: Uskmouth Power , West Nash Road, Nash, Newport

APPLICATION TYPE: Environmental Impact Screening

I have screened the above proposal in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 and with reference to Welsh Office Circular 11/99: Environmental Impact Assessment.

I conclude that the proposal is Schedule 2 development, 13(a) Change or extension to a Schedule 1 development (thermal power station of 300 megawatts or more) which as changed or extended may have significant adverse effects on the environment.

Having completed the screening process with reference to Schedule 3 of the Regulations, I consider that the proposal is capable of having significant environmental effects and constitutes EIA development. I have attached the screening proforma for reference.

The key environmental issues identified are:

- The risk of a very significant increase in HGV movements along Corporation Road and along the Southern Distributor Road with particular concerns over the capacity of the Corporation Road / SDR junction to deal with the increased traffic volumes since it is already subject to significant levels of congestion especially at peak times.
- A concomitant risk to the amenity of residents adjacent to that junction via increased traffic volumes in regard to noise & vibration.

- A risk to air quality from increased numbers of queuing HGVs at the Corporation Road / SDR junction.

This concern is predicated on the information provided in the RPS document 'EIA Screening Report' (OXF10907, July 2018 Revision 3), that is:

3.25 However, as the pellet facility is not consented and rail delivery of fuel cannot be guaranteed at this stage, as a worst case for EIA screening a scenario in which all pelletised SRF or biomass fuel (if required) is delivered directly to the proposed fuel storage silos by road has been considered. Assuming a 20 t HGV payload, the 1,040,688 tpa of fuel could require up to around 52,000 HGVs (104,000 two-way movements) per annum.

3.26 Combustion of the pelletised SRF is expected to leave up to 17% unburned ash content by mass (a fairly similar proportion to historical ash from coal combustion), which would equate to around 176,000 tpa and 8,850 HGVs (17,700 two-way movements) with a similar payload assumption.

3.27 Pelletised SRF delivery and ash residue export may therefore together require up to around 60,850 HGVs (121,700 two-way movements) per annum as a worst-case in operation.

Please note that the above does not amount to a formal scoping of the proposal under Regulation 14 but is provided as a precis of likely key issues. If you accept the Council's screening opinion you may seek a formal scoping opinion.

Caveats

Should significant amounts of the pelletised SRF and the removal of ash be via rail aping the existing situation relating to coal deliveries then the anticipated impacts outlined above may not accrue and the development may cease to be considered to be EIA development. This is because the chief concerns relate to the road movements associated with the delivery of fuel and the removal of ash.

The new road at Liberty Steel may also constitute Schedule 2 development 10(f) 'construction of roads' if the area of works exceeds 1Ha. The extent of the new road is not clear from the submitted information. As such it has not been possible to screen this aspect of the proposal. However assuming a carriageway width of 6m the new road would need to be approximately 1.7Km long to reach the area threshold (excluding verges). The applicant should consider the scale of the road and whether it constitutes Schedule 2 development as a single element of the scheme and whether it is capable of having significant environmental effects either alone or in combination with other elements of the scheme.

Material Change of Use & other Considerations

I am satisfied that the proposed change in fuel source would not amount to a Material Change of Use at the site but the new development required to service the use of pelletised SRF does have significant implications for the highway network and associated issues (listed above) which do amount to material planning considerations in my view and which should be addressed in any submitted application.

Should you disagree with this assessment, you may seek a screening direction from the Welsh Ministers, see Regulation 7.

Yours sincerely

Geraint N. Roberts

Geraint N. Roberts

**Principal Planning Officer / Prif Swyddog Cynllunio
East Team / Tîm y Dwyrain
Newport City Council / Cyngor Dinas Casnewydd**



Uskmouth B Power Station Conversion

EIA Screening Report

For SIMEC Atlantis Energy Ltd



Quality Management

Prepared by:	Tom Dearing	Principal Environmental Consultant		05/07/18
Reviewed & checked by:	Dan Smyth	Senior Director		05/07/18
Authorised by:	Dan Smyth	Senior Director		05/07/18
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Rev	Date	Status	Reason for revision
0	22/05/18	Partial draft	-
1	19/06/18	Full working draft	Client comments on partial draft
2	02/07/18	Final draft	Internal review
3	05/07/18	First issue	Final client review

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Contents

1	Introduction.....	1
	Schedule 1 development screening.....	1
	Schedule 2 development screening.....	3
2	Development Site and Existing Environment.....	5
	Development site and setting.....	5
	Environmental sensitivities of site and setting.....	6
3	Proposed Development.....	10
	Fuel silos and conveyors.....	10
	Fuel supply.....	11
	Power station equipment conversion.....	12
	Access and road traffic.....	12
	Drainage.....	13
4	Environmental Effects Screening.....	14
	Landscape and visual amenity.....	14
	Archaeology and cultural heritage.....	14
	Ecology.....	15
	Traffic and transport.....	16
	Air quality and odour.....	18
	Noise and vibration.....	19
	Water resources and flood risk.....	20
	Geology, hydrogeology and land contamination.....	21
	Climate change.....	22
	Socio-economic, population and human health.....	22
	Accidents and disasters.....	22
	Natural resources, material assets and waste.....	23
	Radiation, heat and light.....	23
	Cumulative effects with other developments.....	23

Transboundary effects.....25
Summary of development features that avoid potential significant environmental effects25
5 Conclusion27
References28

Tables

Table 4.1: Summary of development features that avoid potential significant environmental effects 25

Figures

Figure 1: Site Location Plan

Figure 2: Proposed Development Plan

Figure 3: Access Plan

1 Introduction

- 1.1 This report provides information to support a request for a screening opinion that is being made under Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('the EIA Regulations').
- 1.2 The request for a screening opinion concerns the proposed development of fuel storage silos, conveyor systems and access together with conversion or replacement of equipment within existing building envelopes to enable combustion of pelletised waste-derived fuel and other biomass fuel at Uskmouth B Power Station, Nash, Newport.
- 1.3 Figure 1 shows the proposed development site land as required by paragraph 2(a) of regulation 6. The following sections of this report provide the remaining information required by paragraph 2, as follows.
- Section 2: Development Site and Existing Environment [6(2)(b)(ii)].
 - Section 3: Proposed Development [6(2)(b)(i)].
 - Section 4: Environmental Effects Screening [6(2)(c) and (d)].
 - Table 4.1 in Section 4 lists those specific features of the proposed development that avoid or prevent potential for significant adverse environmental effects [6(2)(e)].
- 1.4 While the proposed development would have beneficial effects – arising for example from employment generation, providing much-needed dispatchable baseload power to the grid and recovering value from residual waste (avoiding disposal) – the focus of this report is on screening for likely significant negative environmental effects that could require EIA.
- 1.5 Under the EIA Regulations, it is necessary to consider first whether the proposed development is of a type listed in Schedule 1, for which EIA is mandatory. If it does not fall within Schedule 1, then types of development listed in Schedule 2 must be considered. If the development does not fall within the relevant types and criteria in either Schedule 1 or Schedule 2, is not in a defined 'sensitive area' and would have no likely significant environmental effects, then EIA is not required.

Schedule 1 development screening

- 1.6 The proposed development would not meet the definitions of any development type listed in Schedule 1.
- 1.7 The types of development in paragraphs 2(a), 10 and 23 are those potentially relevant. These are:

"The carrying out of development to provide:

"2.—(1) Thermal power stations and other combustion installations with a heat output of 300 megawatts or more.

“10. Waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9) of non-hazardous waste with a capacity exceeding 100 tonnes per day.

“23. Any change to or extension of development listed in this Schedule where such a change or extension in itself meets the thresholds, if any, or description of development set out in this Schedule.”

- 1.8 Uskmouth B power station has an installed generation capacity of around 393 megawatts gross electrical output (MW_e) from three steam turbine generator units. The measured efficiency of two of these units in 2016 was around 30-32%, and at that efficiency the installed 393 MW_e generation capacity would equate to a thermal output in the region of 1,270 MW_{th}. The proposed development would involve modification to this existing power station to convert the fuel it fires, but would not provide any additional heat output.
- 1.9 Uskmouth B power station is therefore already a thermal power station with capacity above the threshold in paragraph 2(a) of Schedule 1, and the proposed development (adding no further capacity) would not in itself or taken with existing capacity cause the same threshold applied by paragraph 23 of Schedule 1 to be exceeded. The proposed development therefore does not meet the development definitions in paragraphs 2(a) or 23.
- 1.10 The proposed development would combust a pelletised residual waste-derived fuel, meeting a defined specification as ‘Solid Recovered Fuel’ (SRF). Although the primary purpose is energy generation rather than waste disposal, EC guidance [1] indicates that ‘disposal’ must be interpreted broadly and includes ‘recovery’ of value from waste for the purpose of the EIA Directive (Directive 2014/52/EU, which is transposed to Welsh legislation by the EIA Regulations), notwithstanding the particular definitions of those terms in the Waste Framework Directive (2008/98/EC). This might therefore be taken to mean that the proposed development engages with paragraph 10 of Schedule 1.
- 1.11 However, Uskmouth B is an existing installation and the proposed development involves *modification* of the existing installation to enable waste incineration (in the EC guidance sense) rather than carrying out development to *provide* a new installation for this purpose. Screening for likely significant environmental effects of modifications to an existing Schedule 1 installation is provided for in Schedule 2 (discussed below). This is the logical and proportional approach to interpretation of the Regulations in the spirit of the EIA Directive, which seeks to identify and avoid or mitigate *significant* effects. Modification in general is likely to have lesser environmental impacts than construction of a new installation, and effects may not be significant in all cases (as opposed to the potential for significant effects assumed for all developments in Schedule 1) and so is appropriate for screening under Schedule 2 using the Schedule 3 criteria.
- 1.12 In the case of the proposed development, notwithstanding the EC guidance about broadly interpreting ‘disposal’ of waste, it is important to stress that the fuel used would be a pelletised product suited specifically to combustion in the former coal-fired power station with minimal

changes to equipment, and that it is several processing stages removed from raw municipal or commercial waste. It would be purchased as a fuel for the primary purpose of energy generation, with no question of the power station receiving gate fees for disposal of the material. The applicant or fuel pellet supplier is likely to seek formal agreement from Natural Resources Wales or the Environment Agency in future that the fuel is an ‘end of waste’ material. The appeal judgement in *R. (On the application of Lowther) v. Durham county council* ([2002] Env. L.R. 13) is relevant: this held that whether a material change of land-use to waste disposal would occur hinges upon the facts at hand rather than narrow technical definitions, in particular whether the use of waste has the primary purpose of energy generation (rather than that energy being an incidental benefit of the primary purpose of disposal), which may be judged among other factors on whether the material is purchased as a fuel.

- 1.13 For these reasons, the proposed development is not considered to fall within the definition of paragraph 10 of Schedule 1.

Schedule 2 development screening

- 1.14 Schedule 2 development is defined in the EIA Regulations as development, other than exempt development, of a description mentioned in Column 1 of the table in Schedule 2 where:

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

- 1.15 The proposed development does not fall within a sensitive area as defined by the EIA Regulations. Therefore, the proposed development does not fall within paragraph (a) above.

- 1.16 With respect to paragraph (b), the proposed development would involve alterations to the existing Uskmouth B power station, which has a capacity above the Schedule 1 paragraph 2(a) threshold as set out above. The description of development in Schedule 2, column 1, paragraph 13(a) is therefore applicable and the development is considered to be a Schedule 2 development:

“The carrying out of development to provide any of the following—

“13 Changes and extensions (a) Any change to or extension of development of a description listed in Schedule 1 (other than a change or extension falling within paragraph 23 of that Schedule) where that development is already authorised, executed or in the process of being executed.”

- 1.17 The corresponding criterion in column 2 for defining a development as EIA development is that *“The development as changed or extended may have significant adverse effects on the environment.”*

- 1.18 The proposed development is not considered to fall within the definition of paragraph 11(b), *“development to provide an installation for waste disposal by incineration (unless included in*

Schedule 1)”, although it would meet all three of the corresponding criteria in column 2, for the reasons set out above: i.e. that it does not provide a new waste disposal installation.

- 1.19 A Schedule 2 development does not require EIA to be undertaken in all cases, but must be considered against the criteria provided in Schedule 3 of the Regulations to establish whether significant effects on the environment are likely. Schedule 3 criteria include the characteristics and location of the development and the characteristics of the potential impact.
- 1.20 The subsequent sections of this report consider the potential for significant adverse environmental effects on the environment due to the proposed development as changed and extended, taking into consideration the criteria in Schedule 3.

2 Development Site and Existing Environment

Development site and setting

- 2.1 The proposed development, excluding access road, would be within the site of the existing Uskmouth B coal-fired power station. The new access would be within the site of the Liberty Steel plant and on land between it and the power station.
- 2.2 The power station site is located on the eastern bank of the River Usk, close to the confluence with the Severn Estuary, around 4 km south of central Newport. The grid reference is ST 32830 83838 and the site address is Simec Uskmouth Power, West Nash Road, Nash, Newport, NP18 2BZ. Figure 1 shows the site location.
- 2.3 Uskmouth B power station was constructed in the 1960s and currently comprises:
- the main power station buildings, housing furnaces, boilers, steam turbines and electrical generators;
 - offices, workshop buildings and car parking;
 - two linear banks of cooling towers;
 - a single exhaust stack;
 - a coal storage area, conveyor systems and pulveriser mills;
 - a pulverised fuel ash storage area;
 - railway tracks;
 - electrical export equipment; and
 - areas of landscaping.
- 2.4 A Lawful Development Certificate for a peaking power plant and advanced conversion technology power plant (ACT, a gasification process for waste) on parts of land within the Uskmouth B power station site was granted in April 2016 (Newport City Council reference 16/0257). The peaking power plant has been constructed. The applicant currently considers it unlikely that the ACT development would be constructed, but both developments have nevertheless been included in the screening of potential cumulative impacts in Section 4.
- 2.5 Immediately to the west, the site adjoins the Severn Power combined cycle gas turbine (CCGT) power station, constructed in 2007 on the site of the former Uskmouth A coal-fired power station.
- 2.6 Immediately to the north is the River Usk and, in the north-east, Newport Uskmouth Sailing Club; to the east is the railway line, a mixture of land with vegetation, hardstanding and a sewage treatment works; and to the south, former ash pits (now vegetated), beyond which is the Newport Wetlands national nature reserve.

- 2.7 The wider site setting is industrialised to the north, with the Liberty Steel works and industrial estates on the east bank of the River Usk stretching from the proposed development site to the A48 ‘Southern Distributor Road’ dual carriageway through the outskirts of Newport. The new M4 ‘Corridor Around Newport’ (M4 CaN) motorway development is proposed to pass through this area on an east-west alignment, with a new river crossing just north of Liberty Steel, though no junction is proposed in this area so it is unlikely that direct access from the proposed development would be possible. The public inquiry into this development closed at the end of March 2018 and a decision is expected later in the year.
- 2.8 The River Usk and the Severn Estuary lie beyond the CCGT power station and Newport Wetlands to the west and south. On the west bank of the Usk is Alexandra Docks, with commercial and industrial land-uses.
- 2.9 To the east, the wider setting is rural, with farmland, minor roads, reens (drainage channels) and individual or small groups of houses. The nearest settlement is the village of Nash, at a little over 1 km from the proposed development site.

Environmental sensitivities of site and setting

- 2.10 As described above, the proposed development site itself is brownfield land, largely already developed for its current coal-fired power station use, and has low sensitivity. Some elements of the proposed development (described in Section 3) would be on parts of the site that are currently landscaped, with amenity grassland and individual trees.
- 2.11 There is known existing asbestos contamination and potential for other existing ground contamination at the development site, given its history of industrial use, though it is understood that the site is mainly on made ground formed of pulverised fuel ash and clay.
- 2.12 The proposed development site is not within or near to any existing or proposed Air Quality Management Area (AQMA) or Newport ‘air quality planning buffer’ zone, the nearest being in central Newport around Chepstow Road, some 4 km from the proposed development site [2].

Landscape and historic environment sensitivities

- 2.13 The coastal landscape south of Newport, east and west of the River Usk, forms National Landscape Character Area 34, the Gwent Levels. The proposed development site is within the Caldicot Level part of this landscape.
- 2.14 The Gwent Levels are described as a distinctive example of a ‘hand-crafted’ reclaimed wetland and inter-tidal landscape, characterised by low, flat agricultural land with patterns of reens and drainage ditches, with an archaeological record showing successive periods of reclamation dating to the time of Roman settlement. Recent developments including steelworks, power stations, motorway and mainline railway and the expansion of Newport are also noted to be apparent in the landscape [3, 4].

- 2.15 Much of the landscape east of the proposed development site is designated as the Gwent Levels registered Historic Landscape of Outstanding Interest, with the area closest to the proposed development forming the Nash / Goldcliff historic landscape characterisation area. The development site itself is not within the registered historic landscape area.
- 2.16 There are no World Heritage Sites within 5 km of the proposed development site. The nearest Scheduled Monuments are the Goldcliff Moated House, around 3 km to the east, and Goldcliff Pill Anti-Invasion Defences on the coast around 3.3 km to the east. The nearest Listed Buildings are the Church of St Mary in Nash (around 1 km east), Fair Orchard Farm and Barn, and Pye Corner Farm at Pye Corner, both around 1.8 km north-east [5, 6].
- 2.17 The landscape and historic environment setting are considered to have moderate to high sensitivity, with an unusual landscape character that is designated also for its historic interest and archaeology, although already influenced by surrounding industrial and infrastructure developments and with no nearby Scheduled Monuments.

Geological and hydrogeological sensitivities

- 2.18 Beneath the reclaimed salt-marsh landscape, the superficial geology is tidal flat deposits of clay and silt overlying Mercia Mudstone sedimentary bedrock [7]. The site is within the general area of Carboniferous Limestone principal aquifer [8] but more specifically characterised as a low-productivity area [9] and the site is not within a groundwater source protection zone [10].
- 2.19 The proposed development site and surroundings are not in an area of mineral resources or an aggregates safeguarding zone [11, 12].

Hydrological sensitivities

- 2.20 The proposed development site is on the bank of the River Usk and around 300 m from an inlet of the estuary fed by Julian's Reen, between the development site and Liberty Steel. Within the site are a number of drainage ditches and a pond adjacent to the coal storage area.
- 2.21 A protected wetland environment with salt marshes and ponds is to the south-west, and in general, the hydrological landscape is characterised by frequent drainage reens.
- 2.22 The River Usk has an overall 'moderate' Water Framework Directive status and the catchment area around the proposed development site have 'moderate' status where assessed [13]. The nearest monitoring point is at the outfall of Julian's Reen to the Usk, just north of the power station site.
- 2.23 The Natural Resources Wales (NRW) flood risk and development advice maps [14, 15] indicate that the majority of the proposed development site is in flood zone 2 and at low risk of flooding from rivers or the sea. However, some areas around the inlet from the Usk to the north-east (where it is crossed by the railway) are in flood zone 3 and at medium or high risk of flooding. The coal storage area is also in flood zone 3. Some limited and isolated areas of low or medium surface water risk are shown in the NRW mapping, reflecting local topography (i.e. drainage ditches in and around the site). Much of the site lies in development advice zone C1 ('areas of the

floodplain which are developed and served by significant infrastructure, including flood defences') but with some areas such as around the coal store and cooling towers in zone B ('areas known to have been flooded in the past').

- 2.24 Overall, the setting is considered to have high hydrological sensitivity due to its close proximity to controlled waters and the importance of hydrology to the ecology and landscape character of nearby designated habitats.

Ecological sensitivities

- 2.25 Within a 5 km radius of the proposed development site are five Sites of Special Scientific Interest (SSSIs), two Special Areas of Conservation (SACs), one Special Protection Area (SPA), one Ramsar site and one National Nature Reserve (NNR) [16]. Many of these designations are conterminous or have areas of overlap.
- 2.26 To the south, east and west of the proposed development site, much of the land and foreshore is designated as a series of SSSIs that together form the Gwent Levels SSSI group along the coast. The nearest of these is the Newport Wetlands SSSI and NNR with wetland, reedbed and estuarine habitats. North of this is the Nash and Goldcliff SSSI, and further east is the Whitson SSSI. Across the River Usk to the west is the St Brides SSSI.
- 2.27 The Severn Estuary is an SAC, and the foreshore or intertidal zone is also designated as a Ramsar site, SSSI and SPA. The lower part of the River Usk is an SAC and SSSI.
- 2.28 These designated sites support a variety of rare and/or ecologically valuable habitats and species, including mudflats and coastal marshes with wading bird populations and the reclaimed marsh and reed landscape with important plant, invertebrate and mammal populations.
- 2.29 While the power station site itself and land to the north have generally low ecological sensitivity, as brownfield industrially-developed sites, the surrounding landscape and water environment in all other directions have high sensitivity as evidenced by much of it being nationally- or internationally-designated.

Human environment and transport sensitivities

- 2.30 As described above, the proposed development site is set among a ribbon of industrial and power generation development along the east bank of the River Usk, between a CCGT power station, sewage treatment works and steel plant.
- 2.31 The nearest residential receptor is at around 750 m distance as the crow flies from the nearest new structure proposed. The nearest settlement is Nash, around 1 km away, and in general the area is sparsely populated.
- 2.32 No public rights of way cross the proposed development site. A section of the Wales Coast Path runs through the Newport Wetlands NNR and is close to the edge of the proposed development site at the coal storage area and existing site entrance, from which clear views can be gained of the power station site over low hedges.

- 2.33 Given the distance to residential receptors and low population of the area, it is considered to have fairly low sensitivity. However, as the existing access to the site is via the rural Nash Road and West Nash Road, which pass through the village of Nash and other groups of houses, the setting is considered to have higher sensitivity to potential road traffic impacts.

3 Proposed Development

- 3.1 The proposed development would comprise construction of fuel storage silos, conveyor systems, together and new access, together with conversion or replacement of equipment within existing building envelopes, to enable the combustion of pelletised waste-derived fuel and other biomass fuel for electricity generation at Uskmouth B Power Station.
- 3.2 The four new fuel storage silos would be modest in scale relative to buildings on the existing power station. Collectively, the four silos would occupy a similar footprint on the site as the existing main power station building (and considerably less than historical coal storage and ash pit areas), but would be much lower structures: at most 25 m in height, whereas the main power station building is around 46 m high and the stack is around 130 m. The conveyor systems from the silos would be similar in appearance and scale to the existing coal conveyors. The silos and conveyors are described further below and are shown in Figure 2.
- 3.3 The existing power station buildings and exhaust stack would remain suitable for electricity generation with the proposed change in fuel. The only external change to the existing buildings proposed is a junction where the new conveyors would join the existing conveyor system and refurbishment of the rail unloading hopper. Other changes to equipment would be made within the envelope of the existing buildings.
- 3.4 No demolition is required for this development. Construction of the silos and conveyors, access and conversion of equipment within the power station buildings is anticipated to take around 18 months.

Fuel silos and conveyors

- 3.5 Four new fuel silos are proposed in groups of two. Each silo would be around 45 m in diameter and up to 25 m in height.
- 3.6 The first pair would be located on the existing coal storage area south of the main power station buildings, adjacent to the existing coal conveyor system. These would be connected to the existing coal conveyor system. An access road loop to these two silos would be constructed off the existing site perimeter road, with space for heavy goods vehicle (HGV) turning at each silo.
- 3.7 SUP is working with contractors to remove the remaining coal in the coal storage area and it is anticipated that after coal removal, the resulting 1–2 m deep void will have been remediated and filled to create a development platform.
- 3.8 The second pair of silos would be constructed on an area that is currently amenity grassland with occasional trees, to the east of the main power station buildings. Again, an access road spur with space for HGV turning would be provided off the existing site perimeter road.

Fuel supply

- 3.9 The power station conversion and provision of fuel silos would allow firing on a mixture of pelletised, waste-derived fuel meeting a defined specification as ‘Solid Recovered Fuel’ (SRF) and, optionally, other biomass fuel. The intention is to operate the power station using 100% pelletised waste-derived fuel, but the station may retain flexibility to introduce a secondary biomass fuel if required for technical or economic reasons. If the secondary biomass fuel is required, storage and handling arrangements would be generally similar to that for SRF and no development with greater potential for environmental effects than the four storage silos (described above) would be required.
- 3.10 The power station following conversion will return to service two of the three existing generation units, with target gross generation 121 MW_e each, annual load factor of up to 90% and target efficiency (lower heating value, LHV) of 33%. Around 5,782 TWh of fuel would therefore be required, which at an expected calorific value of 5.56 kWh/kg (LHV) for the pelletised SRF would equate to around 1,040,688 tonnes per annum (tpa).
- 3.11 Part of this fuel requirement is expected to be supplied from a new pelletised SRF production facility to be developed within or adjacent to the power station site, subject to a separate planning application. In that case the pelletised SRF could be transported to the silos by conveyor system connections from this new production facility. The planning application and supporting EIA (if required) for the new pellet production facility would address any likely significant environmental effects associated with the pelletised SRF production, including for example transport of waste to the production facility (whether by road, rail or sea) and any noise, odour or other air pollutant emissions.
- 3.12 The remaining fuel would be supplied directly to the power station from other pelletised SRF production sources in the UK. Biomass fuel, if required, would also be delivered directly to the power station.
- 3.13 The power station site has an existing rail connection and off-loading facilities for coal, and is on the bank of the River Usk. The applicant will seek insofar as possible to have pelletised SRF delivered by rail rather than road, making use of the existing rail connection. This depends on agreements with fuel suppliers and logistical feasibility, but historically rail has been the primary delivery route for coal and the existing rail connection remains suitable. Refurbishment and upgrading of the existing rail unloading hopper would be required and is part of the proposed development considered in this screening report.
- 3.14 The applicant will also explore opportunities for delivery of fuel by sea, but provision of jetty and offloading facilities are not part of the proposed development considered at this stage and so fuel delivery by road and rail only has been screened.
- 3.15 It is anticipated, broadly, that around 40% of pelletised SRF could be supplied from the pelletisation plant and 60% would be supplied from other production sources in the UK. Rail

delivery is more likely to be feasible for the fuel delivered from production facilities elsewhere in the UK, whereas road delivery of fuel to the pelletisation plant is more likely.

- 3.16 The pelletised SRF will have a broadly similar calorific value (energy content per unit mass) as the formerly used coal fuel, and so the total fuel supply required for operation of each power station unit would be similar to historical operation.

Power station equipment conversion

- 3.17 The great majority of existing power station equipment is expected to be suitable for firing on the proposed pelletised SRF and (if required) biomass fuel instead of coal, including the major components such as furnace, boilers, steam turbines, stack, electricity generators and grid connection. Current plans that are the subject of this EIA Screening Request are for only two of the three generation units to be converted, with the third remaining un-used. However, the applicant may in future also convert the third generation unit if desirable and grid connection capacity were available; if so, this would be subject to development control at the time.
- 3.18 Only limited changes to equipment would be required, which would be carried out within the envelope of existing buildings and other structures. No new buildings or structures are proposed except for the fuel silos and conveyors that have been described above.
- 3.19 The main equipment that would require replacement would be stages of the combustion system, i.e. fuel pulverising mills, fuel handling and burner systems. These would be replaced with equipment suitable for the pelletised SRF and (if required) biomass fuel. A new under-fire grate would be provided to burn fuel dropping through, improving energy recovery and minimising residual carbon in ash.
- 3.20 Other equipment likely to require conversion or replacement would be electrical switchgear, monitoring equipment (installed in same locations as existing) and the air pollution control (APC) system. Components of the APC system will be upgraded, repaired or replaced (as needed) to ensure compliance with revised Environmental Permit conditions.

Access and road traffic

- 3.21 A new access road would be constructed on private land from the public highway at Corporation Road north of the power station site, running through the Liberty Steel site and crossing Julian's Reen where it is culverted by the existing railway line. The access is shown in Figure 3. Between Liberty Steel and the power station, the access road would upgrade an existing track that parallels the railway. The railway line would remain in place.
- 3.22 Corporation Road provides direct access to the strategic highway network at the A48 Southern Distributor road, passing mainly through industrial estates with limited non-industrial traffic. In the future, if the M4 CaN is approved, this access route via the A48 will provide a rapid connection to the M4 motorway.

- 3.23 This new access route would be the primary route used by operational traffic for fuel delivery and ash export. The existing access via West Nash Road would be used as a secondary option in limited circumstances, e.g. if access via the primary route were disrupted, which the applicant anticipates would be limited to no more than two to three weeks per year. Construction traffic is likely to mainly use the existing access via West Nash Road.
- 3.24 As discussed above, it is expected that around 40% of the pelletised SRF would be sourced from a new production facility on or close to the power station site and could be delivered by conveyor system, requiring no additional road traffic movements. Transport of input waste to the pellet production facility would be subject to the planning application and EIA (if required) for it. The applicant will seek to have the remaining fuel delivered by rail if feasible.
- 3.25 However, as the pellet facility is not consented and rail delivery of fuel cannot be guaranteed at this stage, as a worst case for EIA screening a scenario in which all pelletised SRF or biomass fuel (if required) is delivered directly to the proposed fuel storage silos by road has been considered. Assuming a 20 t HGV payload, the 1,040,688 tpa of fuel could require up to around 52,000 HGVs (104,000 two-way movements) per annum.
- 3.26 Combustion of the pelletised SRF is expected to leave up to 17% unburned ash content by mass (a fairly similar proportion to historical ash from coal combustion), which would equate to around 176,000 tpa and 8,850 HGVs (17,700 two-way movements) with a similar payload assumption.
- 3.27 Pelletised SRF delivery and ash residue export may therefore together require up to around 60,850 HGVs (121,700 two-way movements) per annum as a worst-case in operation.
- 3.28 As set out above, all coal from the coal storage area will have been removed and this area remediated prior to construction of the proposed development. Broadly suitable development levels will be available at the proposed silo and access road locations, and no major construction traffic for bulk cut or fill material export or delivery is anticipated.

Drainage

- 3.29 The new fuel storage silos, associated hardstanding and internal access road spurs would add only a small amount of additional impermeable surface relative to the existing power station site (illustrated on Figure 2). The existing power station drainage system is considered to have adequate capacity to manage runoff from the additional impermeable surface.

4 Environmental Effects Screening

Landscape and visual amenity

- 4.1 The size and appearance of existing power station buildings, including the stack, would not be changed by the proposed development.
- 4.2 The four new pelletised SRF storage silos and associated conveyors would be no more than 25 m in height, significantly lower than the existing power station buildings (around 46 m and 38 m high for the boiler house and turbine house, respectively) and stack (130 m). The footprint of the silos and conveyors (shown in Figure 2) means that they would have significantly less massing than the existing power station buildings.
- 4.3 Views of the silos and conveyors would be against the backdrop of the larger existing power station buildings from potential viewpoints to the south and east. In possible views from the north and west (i.e. from the River Usk and across on its far bank), the two silos and conveyors on amenity grassland to the north-east of the power station buildings would be seen from some angles as an extension to the built-up area of the power station site, albeit still clearly in the context the existing power station buildings and cooling towers and other industrial development to the north and south.
- 4.4 The development site has a long history of industrial use for power generation, and this land use is acknowledged to have been a long-standing influence on landscape character as described in Section 2. It is set between a steel works to the north and a CCGT power station adjacent to the south.
- 4.5 No significant additional visual amenity or landscape character effects from the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Archaeology and cultural heritage

- 4.6 As set out above, the industrial developments on the east bank of the Usk including the power station are acknowledged to form a part of the existing historical landscape character. No significant additional effects on this due to the proposed development are considered likely.
- 4.7 The nearest Listed Buildings are at more than 1 km distance and the nearest Scheduled Monuments at more than 3 km. Taking into account the lack of likely significant visual or landscape character effects of the proposed development, significant effects on the settings of these heritage assets are considered unlikely.
- 4.8 The proposed development site lies in the archaeologically sensitive area of the Gwent Levels, and it has been noted in comments from the Glamorgan-Gwent Archaeological Trust on nearby planning applications on the Liberty Steel site and Julian's Reen crossing (see cumulative developments section below) that remains of significant prehistoric and Roman activity have

previously been found in the vicinity. The proposed development would be primarily or wholly on previously-developed land of the power station, railway route and Liberty Steel site, so additional disturbance of below-ground archaeology is considered relatively unlikely. However, an archaeological watching brief during construction would be provided if appropriate for development on land that has not been subject to substantial previous disturbance, and if archaeological features of interest are encountered, a further written scheme of investigation would be prepared.

- 4.9 Subject to these measures, no significant additional effects on archaeology or cultural heritage from the proposed new development or the development as a whole, as changed and extended, are considered likely.

Ecology

On-site habitats

- 4.10 The existing coal storage area on which two of the silos would be constructed is considered to have very low potential for any ecological value, as is still in active use at present for coal storage.
- 4.11 The area of amenity grassland and row of trees east of the main power station buildings, where the other two silos would be constructed, is considered unlikely to have more than site/local ecological value. However, depending on the current management regime of the grass, there may be potential for invertebrate and reptile species to be present and the trees could provide nesting for breeding birds.
- 4.12 Areas of scrub around the railway line and track where the new access road would be constructed may have higher habitat value, but the access road is expected to follow the existing track and have minimal additional land-take requirement in this area.
- 4.13 The existing crossing of Julian's Reen is not expected to require any significant modification due to construction of the access road, but if changes to this crossing are necessary, prior surveys for otter and water voles would be undertaken as both species are known to be present in the area.
- 4.14 Existing ponds and watercourses on and around the power station site would not be affected by the proposed development, and no impact on habitats or species present in these water bodies is foreseen.
- 4.15 The existing power station buildings and conveyors have been in recent active use and are not proposed to be demolished or significantly modified as a result of the proposed development. The buildings are therefore not considered to have significant bat roost potential that would be affected by the proposed development.
- 4.16 A Phase 1 habitat survey would be undertaken and report provided with the planning application. This would recommend any appropriate species or habitat protection measures, or enhancement measures elsewhere on site if necessary to compensate for habitat of value being lost. If the

construction of elements of the proposed development requiring tree or scrub loss were undertaken during the bird breeding or wintering seasons, nesting checks would be undertaken in advance by a qualified ecologist.

- 4.17 Subject to the findings and mitigation recommendations of the proposed habitat and if appropriate species surveys, no significant additional effects on on-site ecology from the proposed new development or the development as a whole, as changed and extended, are considered likely.

Off-site habitats

- 4.18 As discussed in Section 2, the proposed development site is set among protected habitats with national and European designations, and although these do not extend to the development site itself, there is direct connectivity via land, water and dispersion of air pollutants.
- 4.19 No significant changes in air pollutant emissions, operational noise, surface water discharge or risk of water contamination are considered likely, due to the environmental controls that will be in place through the facility's Environmental Permit and taking into account the minimal changes proposed to existing power station operation. Air pollutant emissions, in particular sulphur dioxide, are expected to be reduced (as discussed further below) compared to existing coal-fired operation, with consequent reduction in impact on off-site habitats.
- 4.20 A Habitats Regulations Assessment Screening Report will be provided with the planning application. Following the judgement in *People Over Wind* (CJEU case C-323/17), it is understood that measures intended to avoid or reduce the harmful effects of a plan or project on a site designated under the Habitats Directive cannot be considered in HRA screening, and therefore an Appropriate Assessment to consider such measures may also be required. Information would be provided such that the Appropriate Assessment can consider potential effects through air, land and water pathways, including construction noise and vibration effects of impact piling if proposed.
- 4.21 Nevertheless, for the reasons set out above and elsewhere in this section concerning such pathways, no significant effects on European designated habitats that cannot be mitigated are considered likely and this is expected to be confirmed via the HRA screening and, if required, Appropriate Assessments.

Traffic and transport

- 4.22 Road access to the proposed development during operation would be primarily via the newly provided access route running from Corporation Road, through the Liberty Steel site (shown in Figure 3), and into Uskmouth Power Station at around the same point as the existing railway line.
- 4.23 In normal operation, all HGV traffic would use this primary route from Corporation Road. However, the existing access via West Nash Road does provide a secondary option that could be used in limited circumstances, e.g. if access via the primary route were disrupted, which the applicant anticipates would be limited to no more than two to three weeks per year. Construction

traffic is likely to mainly use the existing access via West Nash Road until the new access has been constructed.

- 4.24 As discussed in Section 3, the applicant expects that a substantial proportion, perhaps 60%, of the pelletised SRF fuel could be delivered by rail, with the remaining fuel produced by an adjacent pelletisation plant to be developed. However, as a worst case for EIA screening, road delivery has been assumed. In operation, delivery of pelletised SRF fuel to the proposed development may require up to around 371 two-way HGV movements per day, likely to be around 31 per hour assuming an equal distribution over a 12-hour working day and seven day working week (for deliveries; power generation would operate on a 24 hour basis).
- 4.25 Construction traffic flows would be substantially lower, as no major cut or fill operation with large volumes of bulk material to be transported is required.
- 4.26 There is restricted height clearance at the railway bridge (14'-9") over Corporation Road just before the Liberty Steel turn-off. Few if any abnormal indivisible loads for construction are anticipated, but in the event that tall deliveries or vehicles (such as cranes or tall construction machinery on low loaders) that exceed this clearance are required, these may need to route via West Nash Road.
- 4.27 With the provision of a suitable new access, providing a direct connection to the A48 (and potentially onwards to the M4 CaN in future) via Corporation Road, no significant adverse road traffic impacts on the rural road network around Nash would occur due to operational traffic.
- 4.28 Corporation Road is primarily used by heavy vehicles and other commercial traffic accessing the industrial, freight, waste management and commercial land-uses in the industrial estates south of the A48, though does pass a recent new-build residential development at Lysaght Way near the A48 junction. Save for a short narrow section where the railway crosses the road just before Liberty Steel, Corporation Road is a two-lane highway and it is suitable for this type of traffic.
- 4.29 The proposed development's daily traffic flow in operation is expected to be above one indicative threshold for a Transport Assessment (100 or more two-way vehicle movements per day or 30 per hour) in the withdrawn Department for Transport Guidance on Transport Assessment [17] (which does not have a replacement). The A48 / Corporation Road signalised junction complex, consisting of four linked signalised junctions in close proximity, is known to be a constraint on the highway network. A Transport Assessment prepared in accordance with the Welsh Government publication TAN18: Transport is likely to be required to support the planning application.
- 4.30 If a substantial proportion of fuel can be delivered by rail as anticipated, the traffic generation would be significantly lower.
- 4.31 The existing power station has adequate car parking space for the operational workforce and no changes to this are proposed.
- 4.32 No public rights of way cross the development site or would be directly affected by it. The Wales Coast Path briefly follows Corporation Road where it passes under the railway, but a pedestrian

footway is available and it is not considered that traffic from the proposed development, in the context of existing steel works, cement works and port traffic on this section of road, would pose a significant additional safety risk to users of this section of the coast path.

- 4.33 Subject to the findings of the Transport Assessment, no significant additional effects on the road network or road safety from the proposed new development or the development as a whole, as changed and extended, are considered likely.

Air quality and odour

- 4.34 The proposed development will continue to use the existing power station stack, which is of a height to provide suitable dispersion of air pollutants. Its operation will be controlled by an Environmental Permit from NRW, which will specify air pollutant emission limits and monitoring requirements. The air pollution control (APC) system will be refurbished and/or redeveloped as necessary and the power station will operate within the emission limits set by the Industrial Emissions Directive (IED).
- 4.35 The existing coal-fired power station is subject to air pollutant emission limits, set out in its current Environmental Permit, for three pollutants: oxides of nitrogen expressed as nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and dust (sometimes referred to as particulate matter, PM). These are expressed as concentrations in the exhaust gas, but are also subject to total annual mass limits set in the applicable Large Combustion Plant Transitional National Plan registers.
- 4.36 For all three of these pollutants, lower (more stringent) emission concentration limits are set by the IED for waste combusted in a co-incineration installation. This means that the proposed development would have a lower air quality impact due to these main pollutants over sub-annual periods, assuming a similar level of exhaust gas flow. A direct comparison is complicated by the different time-averaging periods used for the emission limits in each case, but for SO₂ in particular the daily mean emissions limit for waste incineration is more than eight times lower than in the current coal combustion permit.
- 4.37 Combustion of waste-derived fuel pellets will introduce the emission of air pollutants not currently controlled by the coal plant Environmental Permit (although that is not to say that such emissions cannot arise from coal combustion), which may include hydrogen fluoride, hydrogen chloride, heavy metals, dioxins and furans. These air pollutants would be subject to limits and monitoring set by a new or revised Environmental Permit in accordance with the IED to levels designed to avoid significant adverse environmental or human health effects.
- 4.38 As a processed, pelletised waste-derived fuel, SRF has low odour potential compared to raw 'black bag' waste. The proposed pelletised SRF storage in enclosed silos, milling within enclosed mills subject to dust control inside the power station building, and distance of around 750 m to the nearest residential receptors, mean that no significant odour impact is considered likely. Road delivery of the pelletised SRF would be in enclosed HGVs, and although there are residential receptors adjacent to the northern section of Corporation Road (and of course other parts of the

road network), no significant impact from low-odour pelletised SRF in passing vehicles is considered likely.

- 4.39 HGV traffic generation by the proposed development would exceed the indicative threshold for when air quality assessment may be required in the IAQM and EPUK *Planning for Air Quality* guidance [18]. The threshold is a traffic flow change of more than 100 annual average daily vehicles in areas away from an AQMA. An air quality assessment, considering vehicle and combustion process emissions, is therefore expected to be submitted with the planning application.
- 4.40 Newport City Council's NO₂ monitoring is partly targeted at areas using a risk-based approach for potential areas of high pollutant concentrations [19]. No monitoring is undertaken in the area south of the A48 where the proposed development site and its road access are located, suggesting that these are at low risk of poor air quality. Defra background air quality mapping [20] indicates modelled annual mean concentrations of NO₂ of 10 to 17 µg.m⁻³ and PM₁₀ of 11 to 15 µg.m⁻³, in both cases well below the Air Quality Objective levels of 40 µg.m⁻³. Background PM_{2.5} is shown as 7 to 10 µg.m⁻³, well below the Air Quality Objective level of 25 µg.m⁻³.
- 4.41 Given the moderate background air pollutant concentrations, fact that the proposed development's traffic generation would not affect an AQMA, and that its main traffic flows would be generated on Corporation Road and the A48 (which are already used by substantial flows of heavy vehicles from surrounding industrial land-uses), it is not considered that significant additional air pollution effects due to road traffic generation are likely.
- 4.42 Overall, subject to the findings of the air quality assessment, no significant additional effects on the air quality or odour from the proposed new development or the development as a whole, as changed and extended, are considered likely.

Noise and vibration

- 4.43 The proposed development's operation would be very similar to that of the existing power station operation in terms of potential noise sources, not significantly affected by the change in fuel supply and storage.
- 4.44 In the construction phase, no demolition is required and there is limited need for bulk earthworks (after coal storage area remediation), as the existing site levels would be suitable. Construction work will therefore involve mainly assembly of the silos and conveyors using pre-manufactured components, with noise from vehicles such as cranes. Depending on foundation design, impact piling could be required.
- 4.45 Given the distance to noise-sensitive residential receptors (at least 750 m), no significant noise or vibration effects from temporary construction activity or during operation are considered likely.
- 4.46 Road traffic generated for fuel delivery would be routed primarily to the A48 (and potentially onwards to the M4 CaN in future) via Corporation Road to the north, avoiding noise-sensitive residential receptors. Corporation Road currently serves heavy industrial, waste management

and freight/distribution users and no significant noise effects from additional road traffic are considered likely.

Water resources and flood risk

- 4.47 The proposed development would not change the existing power station's process water treatment and discharge, e.g. for boiler blow-down, and no new risk of surface water contamination would be caused by power station operation.
- 4.48 The pelletised SRF storage silos and new / refurbished conveyors would be enclosed and weatherproof, with no runoff contamination through contact with stored pellets and minimal potential for pellet spillage. The silos would be constructed on an impermeable surface with sealed drainage, controlled via a manual release such as penstock valve. In the event of pellet spillage, surface water runoff from these areas can be controlled and, if necessary due to contamination, tankered off-site for appropriate treatment. Risk of surface water contamination would therefore be low.
- 4.49 The section of new access road would be constructed with appropriate drainage, to minimise risk of contamination to surface water discharge. Crossing of Julian's Reen will be via the existing railway crossing (where the reen is culverted), with no additional impacts on that watercourse.
- 4.50 No additional water resources would be required due to the proposed development: the power station's cooling would continue to be provided by the current system using water from the nearby sewage treatment works, and towns water use for boiler top-up would not be increased. Process water discharges (e.g. from boiler blowdown) would continue to be managed as with the existing power station systems (controlled by the Environmental Permit), with no additional impacts.
- 4.51 Part of the development site lies within flood zone C1 and new impermeable area would be added by the proposed development. A flood consequence assessment will therefore be undertaken and submitted with the planning application, following the guidance of TAN 15 [21]. This will consider flood risks to the development and elsewhere within the flood plain. The assessment would recommend any necessary mitigation to avoid unacceptable flood risk impact (including climate change allowance) to on- or off-site receptors.
- 4.52 It should be noted that potential for surface water runoff to increase downstream flood risk is minimal given the presence of the adjacent tidal River Usk and Severn Estuary for discharge, with flows of a volume that could not be measurably affected by any clean surface water discharge from the development site.
- 4.53 With regard to flood risk to the development site itself, NRW flood zone mapping as discussed in Section 2 indicates that the majority of the site is at low risk of pluvial, fluvial or coastal flooding due to existing flood defences. Extensive modelling of coastal flood risk to the Caldicot Levels has been undertaken in recent years, associated with the M4 CaN proposal, which indicates

increased risk to properties and infrastructure including Uskmouth Power station after 2030 if existing coastal defences were not to be upgraded. The M4 CaN itself, if approved, would also increase flood consequences for downstream areas in the event of coastal defences being overtopped. However, the Welsh Government in the Severn Estuary Shoreline Management Plan 2 has defined a 'hold the line' policy for the next 100 years, and the draft Severn Estuary Flood Risk Management Strategy identifies a high benefit to cost ratio for future upgrading of flood defences for the Caldicot Levels, meaning that this can reasonably be expected to be undertaken.

- 4.54 Overall therefore, subject to the findings and implementation of any mitigation recommendations of the flood consequence assessment, it is considered likely that coastal flood risk to the proposed development would remain within acceptable standards of protection over its operating lifetime (around 20 years), and also that the small areas of pluvial or fluvial flood risk identified in NRW mapping would not significantly affect the proposed development.
- 4.55 No significant additional effects due to flood risk or water contamination on or from the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Geology, hydrogeology and land contamination

- 4.56 Due to the longstanding historical use of the site for power generation, and the adjacent railway and steel works land-uses, ground contamination may be present in the areas to be redeveloped for the pelletised SRF storage silos and the new access. Asbestos is understood to be present in existing power station buildings and there are known areas of buried asbestos on the site; wider contamination of soil on site with asbestos is also therefore possible.
- 4.57 Prior to construction of the proposed new silos, all coal in the current coal storage area will have been removed and the resulting 1–2 m void will have been filled to create a development platform. In this area of the site, a remediated development platform for the proposed silos will therefore already be available. However, in both this and the amenity grassland area of development, construction of foundations (in particular piling, if required) could have potential to mobilise any soil contamination present or create preferential pathways to groundwater.
- 4.58 It is expected therefore that a Phase 1 desk-based geo-environmental report will be submitted with the planning application, which would recommend any further necessary intrusive site investigation, risk assessment and remediation work to be undertaken prior to development.
- 4.59 During operation, the proposed storage of pelletised SRF in enclosed silos constructed on an impermeable surface with sealed drainage means that there is no potential for ground or groundwater contamination from fuel storage and handling. Combustion residues would continue to be sent for re-use or disposal at appropriately licensed off-site facilities.
- 4.60 Existing ground contamination, if present, can be routinely managed through remediation and appropriate construction working methods. Subject to the findings of the further risk assessment

and appropriate remediation if required, as set out above, no significant additional effects due to ground contamination associated with the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Climate change

- 4.61 Net greenhouse gas (GHG) emissions from the power station as changed to operate with pelletised SRF and biomass fuel would be lower than from operation on coal in total and per MWh of electricity generated, given the partial biogenic carbon content of the proposed fuels, the slightly improved electricity generation efficiency expected to be achieved, and the avoidance of transporting coal from the Baltic. GHG emission benefits may also arise from diverting biodegradable waste from landfill.
- 4.62 Initial analysis by the applicant suggests that the net GHG emissions per MWh of electricity generated from pelletised SRF may be reduced by half compared to equivalent generation from coal.
- 4.63 The principal climate change risk to the proposed development is flooding, which has been discussed above. Other expected climatic changes over its approx. 20 year operating lifetime (potential increases in peak summer temperatures and drought conditions, changes in winter extremes and storm events, changes in humidity) are not expected to be of a magnitude to significantly affect the development or lead to additional adverse environmental effects.

Socio-economic, population and human health

- 4.64 The proposed development would provide employment opportunities in construction and operation, with potential for beneficial socio-economic effects.
- 4.65 No significant adverse effects via environmental pathways that could affect human health are considered likely, as discussed under the relevant pathway headings in this section (e.g. air quality, road traffic, water or ground contamination).

Accidents and disasters

- 4.66 The principal natural disaster with potential to influence environmental effects of the proposed development is coastal flooding. As discussed above, this has a low risk of occurrence and low potential for adverse environmental consequences, as the new pelletised SRF storage would be in enclosed silos providing protection from flood water.
- 4.67 Potential fire or explosion risk from storage and handling of pelletised SRF will be managed through design and operation of the silos, conveyors and mills in compliance with the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) and through the Fire Prevention Plan requirements under the facility's Environmental Permit.

- 4.68 No significant additional environmental effects due to accidents or natural disasters affecting the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Natural resources, material assets and waste

- 4.69 Electricity generation from pelletised SRF would recover value from a waste material and would replace use of coal resources. This would be a beneficial effect on the use of natural resources compared to generating electricity by consuming coal. Secondary biomass fuel, if used, is likely to also be a waste wood material. Use of virgin biomass is not proposed by the applicant.
- 4.70 Bottom ash and fly ash (including air pollution control residue) waste streams from the proposed development would be broadly similar in amount to the existing coal-fired power station for equivalent generating capacity, and would continue to be disposed of via the same routes: hazardous landfill for fly ash and either landfill or re-use as a construction or cement-manufacturing resource for bottom ash. The applicant also intends to investigate opportunities for beneficial re-use of fly ash, to avoid landfill disposal.
- 4.71 The proposed development would be constructed entirely within the site of the existing coal-fired power station and, for the access road, the existing Liberty Steel site and/or railway land. There would be no loss of agricultural land or land with high ecological value.
- 4.72 No significant additional adverse effects on or from natural resources, material assets or waste from the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Radiation, heat and light

- 4.73 The proposed development would not cause any additional emission of radiation, heat or light compared to operation of the existing power station. The electricity grid connection, cooling system and site security and stack lighting would not be changed.
- 4.74 No significant additional effects due to radiation, heat or light from the proposed new development or the development as a whole, as changed and extended, are therefore considered likely.

Cumulative effects with other developments

- 4.75 A search has been made for consented developments that may have potential for cumulative construction or operational impacts with the proposed development. Planning applications in the Lliswerry Ward (within which the proposed development site is located) listed on the Newport City Council planning website in the last three years (i.e. from June 2015) have been reviewed. Nationally Significant Infrastructure Projects listed on the National Infrastructure Planning website in the Newport area have also been reviewed.

- 4.76 A Lawful Development Certificate for a peaking power plant and ACT plant within the power station site was granted in April 2016 (Newport City Council reference 16/0257) and the peaking plant has been constructed. Both developments were screened as non-EIA and so are unlikely to have significant cumulative environmental impacts with the proposed development. The applicant does not at present expect that the ACT plant will be constructed. Nevertheless, the effect of cumulative air pollutant emissions in operation could be considered if necessary in the air quality report to be submitted for the proposed development.
- 4.77 The M4 CaN development is not consented, but if approved would have potential during its construction for cumulative impacts to the local road network, affecting construction or operational traffic for the proposed development. However, the M4 CaN scheme includes a detailed programme of environmental and traffic management measures to minimise impacts. The Corporation Road access route will remain open and the proposed diversion of the Wales Coast Path would not cause greater effects on it due to the proposed development. Due to the distance from the proposed development site, significant cumulative air quality (including dust) or noise effects are considered unlikely. In operation, the M4 CaN if approved would offer an improved long-distance road connection for traffic from the proposed development.
- 4.78 Major redevelopment is being undertaken at the Glan Llyn ('Celtic Business Park') site on the former Llanwern steelworks site, but due to distance from the proposed development, no significant cumulative effects are considered likely.
- 4.79 Construction of nine bunded tanks for storage of up to 25,000 t of petrochemicals (refs. 16/0585 and 16/0609) is consented on the Liberty Steel site. This would lie in the path of one of the two access route options through Liberty Steel now envisaged for the proposed development, and it is assumed therefore that this petrochemical storage development is not being progressed and no cumulative impacts would occur.
- 4.80 Development of a peaking power plant and ACT plant on the Liberty Steel site is consented (ref. 16/0096) but as equivalent developments are also consented for the Uskmouth Power Station site, one of which has been constructed, and the Liberty Steel plants' site would lie in the path of one of the two access route options now envisaged for the proposed development, it is assumed that these power generation developments are not being progressed and no cumulative impacts would occur.
- 4.81 Construction of a single wind turbine at the wastewater treatment works east of the proposed development site is consented (ref. 11/1287 FO) and permission was granted to extend construction hours in 2016 (ref. 16/0896). It is unlikely that the short construction period would overlap with that of the proposed development or cause significant cumulative construction impacts. Construction traffic access (including heavy crane and abnormal loads) needed for the wind turbine is proposed via Liberty Steel, so cumulative traffic impacts on West Nash Road are unlikely. The wind turbine would be closer to the nearest sensitive residential receptors and so significant additional cumulative noise or visual effects on these receptors due to the proposed development are unlikely. The Environmental Statement for the wind turbine did not predict

unacceptable significant adverse effects and overall, significant cumulative effects with the proposed development are considered unlikely.

- 4.82 Development of a battery storage facility off Traston Road close to Corporation Road is consented (ref. 16/0855). Due to distance from the proposed development, no cumulative effects are considered likely.
- 4.83 Development of an oil and gas exploration well south of West Nash Road just west of the Newport Wetlands NNR is consented (ref. 11/1351) and a time extension for implementation has been granted in 2018 (ref. 18/0027). The Environmental Statement for the exploration well did not predict unacceptable significant adverse effects, and given the exploration well site's greater proximity to the nearest sensitive residential receptors, significant cumulative visual, noise or air quality effects arising due to the proposed development are unlikely. Significant cumulative road traffic effects are unlikely as the proposed development's traffic would not route primarily via West Nash Road.
- 4.84 Re-grading and creation of an access track to the flood defence sea doors at the crossing of Julian's Reen was consented in 2018 (ref. 18/0027). It is unlikely that the short construction period would overlap with that of the proposed development and lead to cumulative impacts or any potential significant cumulative effects. There would be no potential for cumulative effects after construction.

Transboundary effects

- 4.85 There is no potential for transboundary effects, due to the site location and lack of significant environmental effects as set out above.

Summary of development features that avoid potential significant environmental effects

- 4.86 Table 4.1 lists those specific features of the proposed development that avoid or prevent potential for significant adverse environmental effects

Table 4.1: Summary of development features that avoid potential significant environmental effects

Development feature	Purpose
Re-use of existing power station buildings, stack, cooling system, coal conveyor and most internal equipment	Largely avoids demolition/construction impacts and use of resources; no significant change in visual impact; no requirement for cooling water abstraction
Proposed development contained within existing power station and Liberty Steel sites	No land-take with loss of protected habitat around sites
Provision of new access road from Corporation Road via Liberty Steel site	Avoids construction and operational traffic impacts on rural roads through Nash area
New access road crosses Julian's Reen where culverted by existing railway crossing	Avoids impact on flow characteristics or water quality of reen or River Usk SAC
Energy generation from pelletised SRF fuel with approx.	Lower fossil carbon content than coal-fired generation, leading to reduced net greenhouse gas emissions; lower

50% biogenic content	sulphur content leading to reduced sulphur dioxide emissions
Use of pelletised SRF fuel produced off-site	Fuel has high calorific value, minimising volume to be transported to proposed development for the given energy generation capacity; fuel has low odour potential and is hydrophobic, minimising potential for odour or water contamination in the event of spillage

5 Conclusion

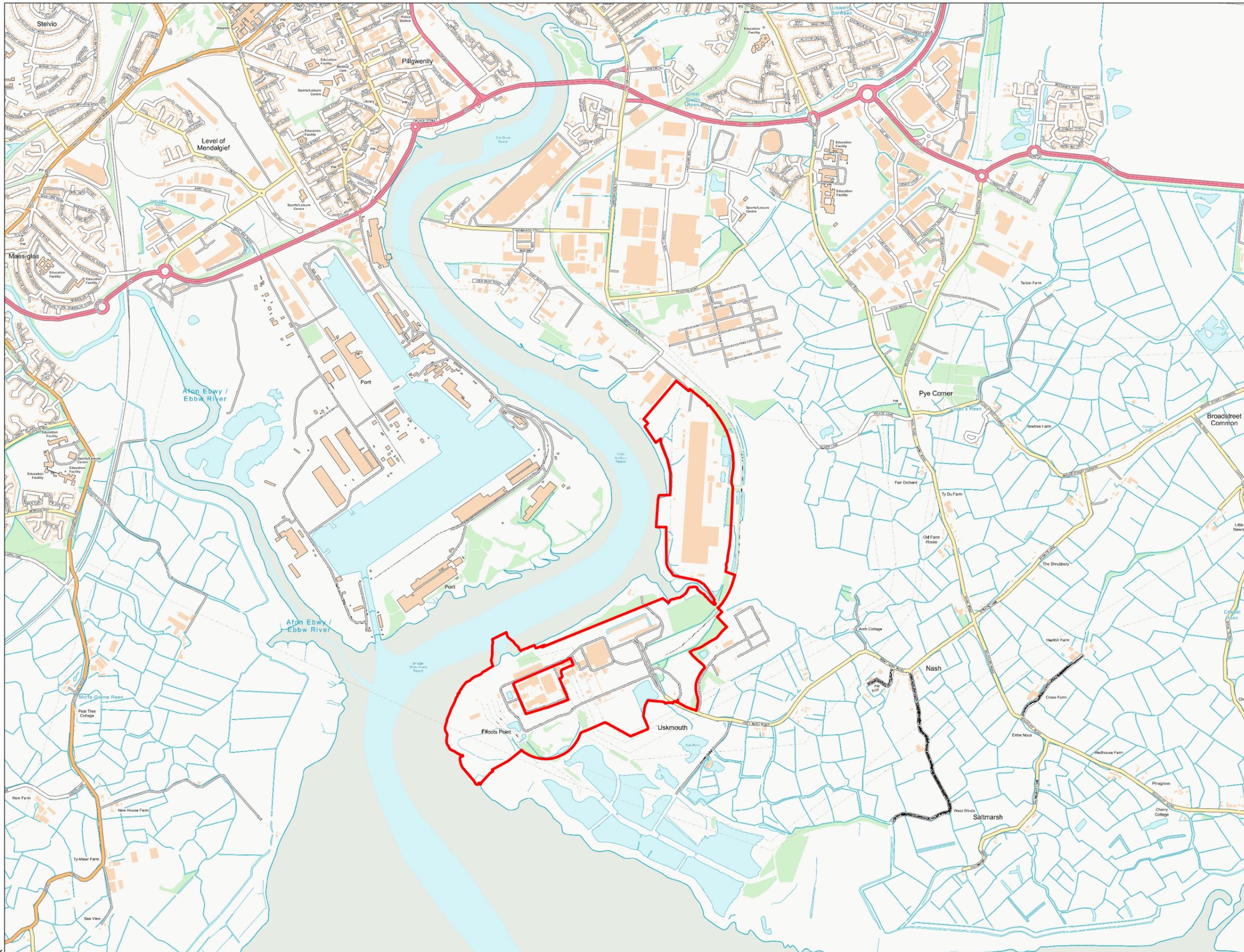
- 5.1 The proposed development does not meet the definitions of any development type listed in Schedule 1 of the EIA Regulations (Wales) 2017. It does meet a definition in Schedule 2, and this EIA Screening Report has therefore considered whether EIA is necessary due to likelihood of significant effects on the environment, taking into account the criteria in Schedule 3.
- 5.2 The characteristics of the proposed development itself and the Uskmouth B power station as a whole, as changed and extended by the proposed development, have been considered, and the potential for significant environmental effects (taking into account the sensitivity of the site and surrounding environment) has been evaluated. Potential effects from the cumulative impacts of other consented developments have also been evaluated.
- 5.3 Subject to certain further environmental surveys and where appropriate any resulting mitigation recommendations, which would be undertaken to support the planning application as set out in the body of this report, no significant environmental effects are considered likely and it considered that the proposed development should be screened as a non-EIA project.
- 5.4 A formal screening opinion from Newport City Council is requested under Regulation 6 of the Regulations.

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Figure 1: Site Location Plan



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 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.

Legend

 Site Boundary

Rev	Description	Date	Initial	Checked



20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
 T: +44(0)1235 821888 E: rps@rpsgroup.com F: +44(0)1235 834698

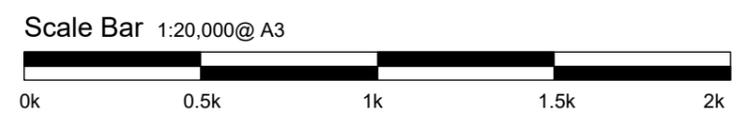
Client **SIMEC Atlantis Energy Ltd**

Project **Uskmouth Power Station Conversion**

Title **Site Location Plan**

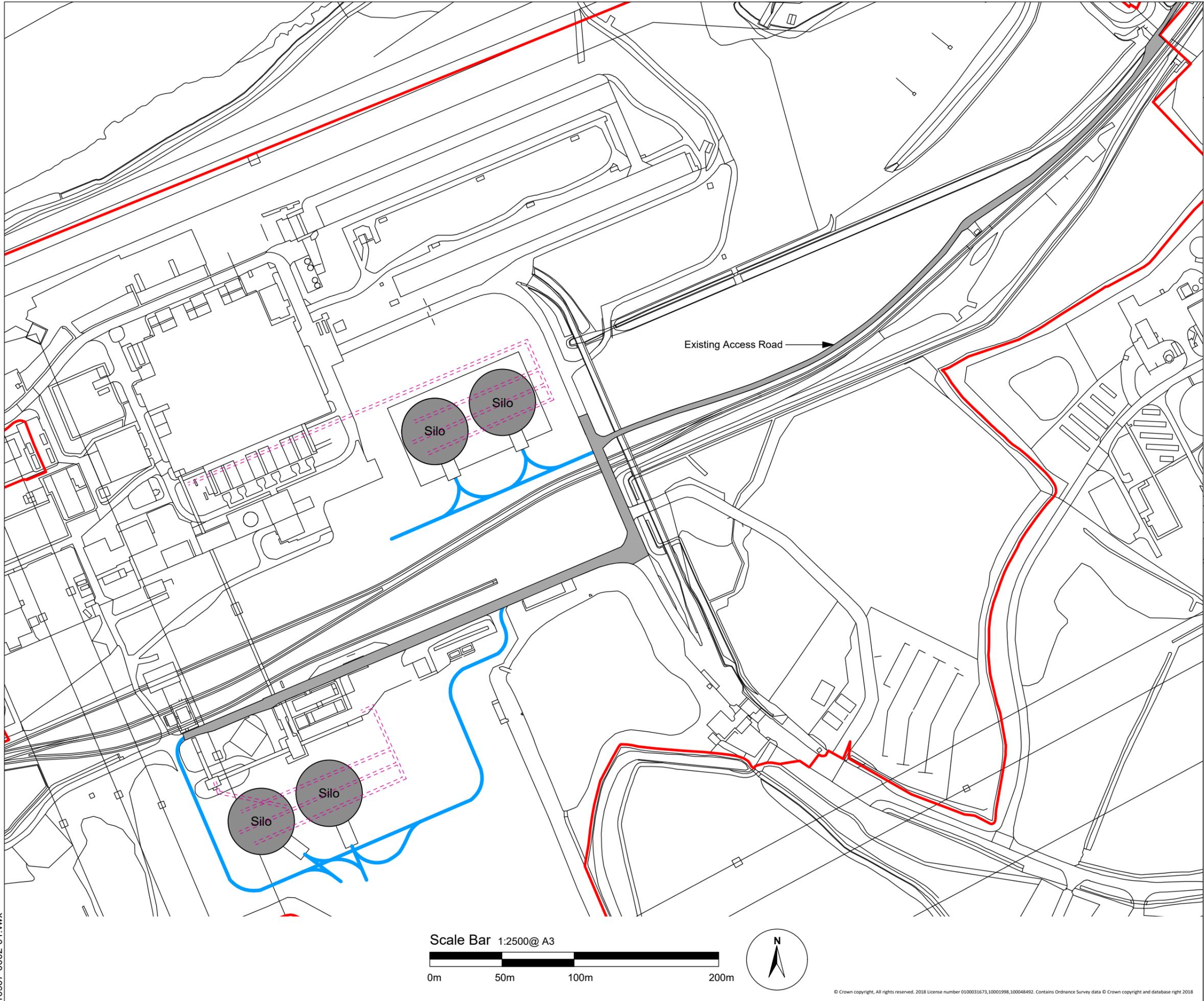
Status	Drawn By	PM/Checked by
FINAL	AJC	TD
Job Ref	Scale @ A3	Date Created
OXF10907	1:20,000	June-18

Figure Number	Rev
1	-



10907-0001-01.wvx

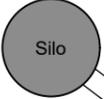
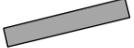
Figure 2: Proposed Development Plan



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 2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

-  Site Boundary
-  Silo
-  Conveyer
-  Access road existing
-  Access road new

Rev	Description	Date	Initial	Checked



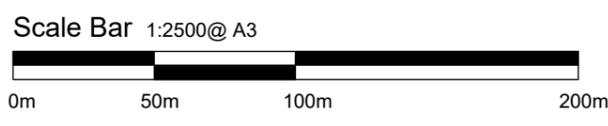
20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
 T: +44(0)1235 821888 E: rps@rpsgroup.com F: +44(0)1235 834698

Client SIMEC Atlantis Energy Ltd

Project Uskmouth Power Station Conversion

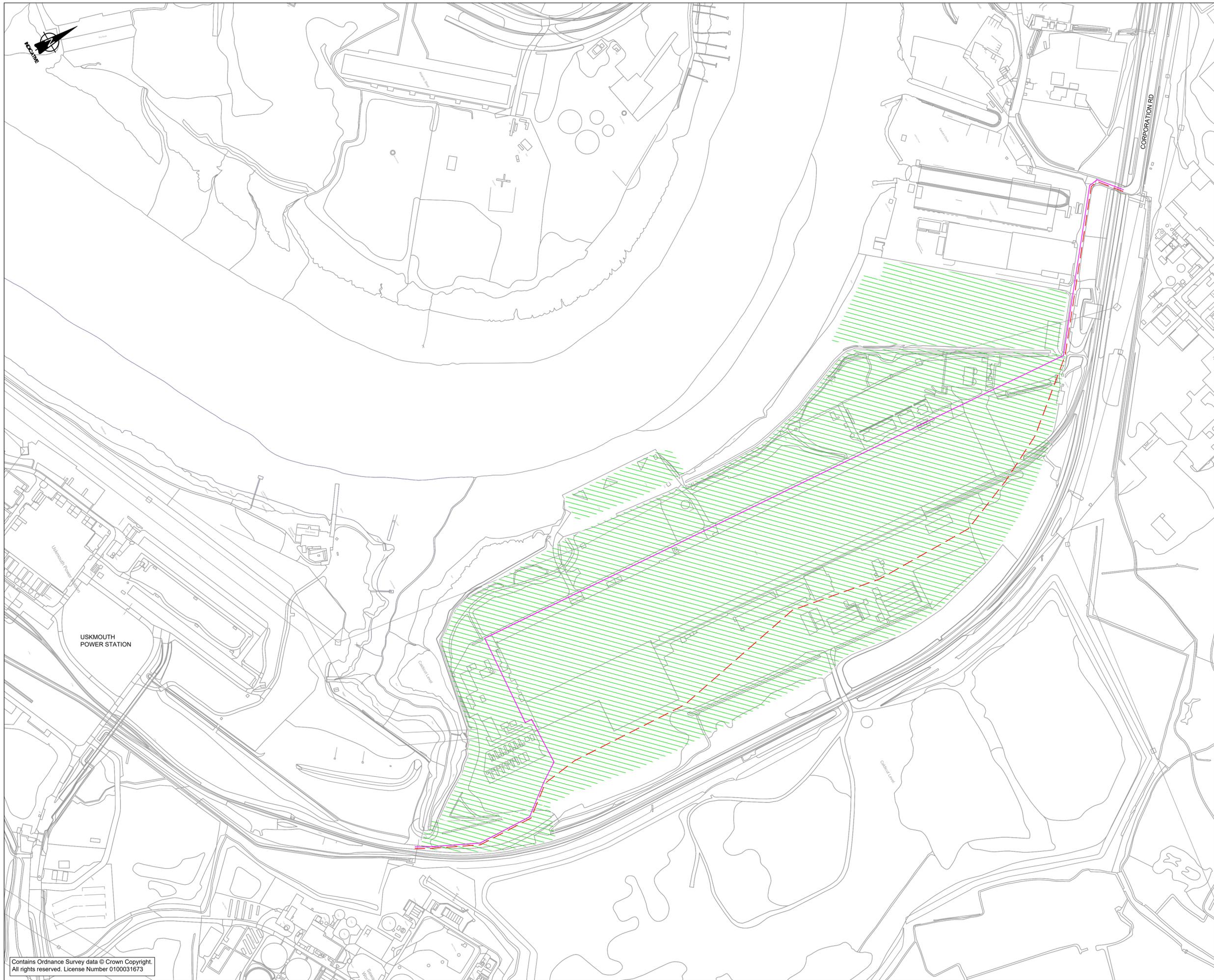
Title Proposed Development Plan

Status	Drawn By	PM/Checked by
FINAL	AJC	TD
Job Ref	Scale @ A3	Date Created
OXF10907	1:2,500	June-18
Figure Number		Rev
2		-



10907-0002-01.wvx

Figure 3: Access Plan



PROJECT
SUP ACCESS REVIEW

CLIENT
GFG Alliance
25 MADDOX STREET, MAYFAIR,
LONDON
W1S 2QN, UNITED KINGDOM
WWW.LIBERTYHOUSEGROUP.COM

CONSULTANT
AECOM
ALDGATE TOWER,
2 LEMAN STREET,
LONDON, E1 8FA
WWW.AECOM.COM

- NOTES**
1. THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL ASSOCIATED SPECIFICATIONS AND ALL RELEVANT ARCHITECTS, ENGINEERS, SERVICES AND SPECIALIST DRAWINGS.
 2. DO NOT SCALE FROM THIS DRAWING. ALL FIGURED DIMENSIONS AND LEVELS ARE IN METERS, UNLESS OTHERWISE STATED.

LEGEND

	LSN LAND
	PROPOSED DEFAULT ROUTE (INDICATIVE)
	PROPOSED ROUTE A1 (INDICATIVE)

ISSUE/REVISION

I/R	DATE	DESCRIPTION
E	25/05/2018	CLIENT COMMENTS UPDATE
D	23/05/2018	CLIENT COMMENTS UPDATE
C	21/05/2018	CLIENT COMMENTS UPDATE
B	27/04/2018	CLIENT COMMENTS UPDATE
A	17/04/2018	DESIGN DETAIL UPDATE

Do Not Scale

SHEET TITLE
Figure 3: PROPOSED DEFAULT ACCESS ROUTE PLAN

SHEET NUMBER
SUP_ACCESS_REVIEW-1002

SCALE
A1 @ 1:2500

**APPENDIX H – COPY OF SPECIALIST CONSULTEE
RESPONSES**

Simon Clements

From: MacMillan Jake <Jake.MacMillan@dwrwymru.com>
Sent: 08 June 2020 12:05
To: Uskmouth Planning
Subject: PPA0004931 - Uskmouth Power Station Conversion Project
Attachments: NCC application.pdf

Dear Sir/Madam,

Thank you for submitting a pre-planning application with us, for the Uskmouth Power Station Conversion Project.

Can you please send forward an attachment for your drainage proposal that you refer to in the application with Newport Council (section 13 of attached).

Kind regards,
Jake

_____ Dwr Cymru Welsh Water is firmly committed to water conservation and promoting water efficiency. Please log on to our website www.dwrwymru.com/waterefficiency to find out how you can become water wise. Mae Dwr Cymru Welsh Water wedi ymrwymo i warchod adnoddau dwr a hyrwyddo defnydd dwr effeithiol. Mae cyngor i' ch helpu i ddefnyddio dwr yn ddoeth yn www.dwrwymru.com/waterefficiency

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Mr D Williams
RPS Consulting Services Ltd
2 Callaghan Square
Cardiff
CF10 5AZ

Date: 19/06/2020
Our Ref: PPA0004931

Dear Mr Williams,

Grid Ref: 332917 183716
Site Address: West Nash Road, Newport.
Development: Uskmouth B Power Station.

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

SEWERAGE

The foul flows only from the proposed development can be accommodated within the public sewerage system. Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account.

However, should you wish for a specific connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

Surface Water Drainage

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to watercourses in liaison with the Land Drainage Authority and/or Natural Resources Wales.

It is therefore recommended that the developer engage in consultation with the Local Authority, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

A water supply can be made available to service this proposed development. Initial indications are that a connection can be made from the 110mm diameter watermain in West Nash Road. The cost of providing new on-site watermains can be calculated upon the receipt of detailed site layout plans which should be sent to the above address.

Advisory Notes

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains; and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

You are also advised that some public sewers and lateral drains may not be recorded on our maps of



public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrwymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.

Cara Donovan

From: donotreply@dwrcymru.com
Sent: 25 June 2020 14:14
To: Uskmouth Planning
Cc: BPMCopies@dwrcymru.com
Subject: Re.PPA0004931. Notification
Attachments: a4b9e074-b20e-11ea-9c4a-000000273617.doc; PPA0004931 Sewer Plan.pdf; PPA0004931 Water Plan.pdf

Dear Customer,

Please find attached important information relating to your application.

Should you wish to contact us for any reason, you must use the contact information shown on the attachment(s).

Please do not reply directly to this message.

Best regards,

Developer Services
Dwr Cymru Welsh Water

_____ Dwr Cymru Welsh Water is firmly committed to water conservation and promoting water efficiency. Please log on to our website www.dwrcymru.com/waterefficiency to find out how you can become water wise. Mae Dwr Cymru Welsh Water wedi ymrwymo i warchod adnoddau dwr a hyrwyddo defnydd dwr effeithiol. Mae cyngor i' ch helpu i ddefnyddio dwr yn ddoeth yn www.dwrcymru.com/waterefficiency

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Cara Donovan

From: Jenna.Arnold2@gov.wales
Sent: 26 June 2020 15:06
To: Uskmouth Planning
Subject: RE: Pre-app Uskmouth Power Station - Chapter 9 historic environment
Attachments: Cadw - 2020-06-26 - Pre-app Uskmouth Power Station - response.doc

Dear Cara

Thank you for your email below.

We appreciate that you would rather not extend the deadline as this will affect the timeline. With that in mind please find attached Cadw's comments for your consideration.

Kind regards
Jenna

-----Original Message-----

From: Uskmouth Planning <planning@simecatlantis.com>
Sent: 24 June 2020 12:43
To: Arnold, Jenna (ESNR-Tourism, Heritage & Sport-Cadw) <Jenna.Arnold2@gov.wales>; Dafydd Williams <dafydd.williams@rpsgroup.com>
Subject: RE: Pre-app Uskmouth Power Station - Chapter 9 historic environment

Dear Jenna

Thank you for your recent correspondence, we appreciate the challenges working during these difficult times and I have provided chapter 9 to assist you with your consultation . We are however keen to preserve the planning timeline and are working to submit the full planning application to NCC in early July, and we would prefer not to extend the deadline for this reason.

As a statutory consultee you will have the opportunity to further engage with NCC when we submit the full planning application and EIA.

We look forward to your feedback and consultation response by 29th June.

Cara Donovan
Senior Environment and Consents Manager
SIMEC Uskmouth Power
Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ

Tel: +44 7469 854 528

cara.donovan@simecatlantis.com

<https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.simecatlantis.com%2F&data=02%7C01%7CJenna.Arnold2%40gov.wales%7Cb62c430bc93e4efdd25d08d81833c002%7Ca2cc36c592804ae78887d06dab89216b%7C0%7C0%7C637285958515504783&msdata=1q9JQS4XyYOLHyjKpju9mVyBC0WIRuF%2F8SA%2FXAJr60%3D&reserved=0>

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-----Original Message-----

From: Jenna.Arnold2@gov.wales <Jenna.Arnold2@gov.wales>
Sent: 17 June 2020 13:51
To: Uskmouth Planning <planning@simecatlantis.com>
Subject: FW: Pre-app Uskmouth Power Station

To whom it may concern

Due to the current COVID-19 crisis our office has been closed since March and so we have not been able to receive any post for several months. As a result we have only just received the above pre-application letter.

I notice that the deadline for comments is 29 June as the letter is dated 1 June. However, as we only got this on the 15 June is there any way we can have longer to respond? I will pass the information on today but if you could let me know if an extension is possible I would be grateful.

Kind regards
Jenna

Jenna Arnold
Cangen Amgylchedd Hanesyddol / Historic Environment Branch Cadw/Cadw Llywodraeth Cymru/Welsh Government
Ffôn/Tel:0300 025 0566

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein hysbysiad preifatrwydd<"https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgov.wales%2Fabout%2Fwelsh-government-privacy-notice%2F%3Flang%3Dcy%25E2%2580%259D&data=02%7C01%7CJenna.Arnold2%40gov.wales%7Cb62c430bc93e4efdd25d08d81833c002%7Ca2cc36c592804ae78887d06dab89216b%7C0%7C0%7C637285958515504783&data=Fp1wUQlAg2wpX6n1KeNG0mE%2Bt1kubtNhrW1q8y6xVxA%3D&reserved=0"> yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our Privacy Notice<"https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgov.wales%2Fabout%2Fwelsh-government-privacy-notice%2F%3Flang%3Den&data=02%7C01%7CJenna.Arnold2%40gov.wales%7Cb62c430bc93e4efdd25d08d81833c002%7Ca2cc36c592804ae78887d06dab89216b%7C0%7C0%7C637285958515504783&data=xx9shhVa1ucWLXSstizcvTDy7awXjL0GhFyNpr%2FIN1g%3D&reserved=0"> explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding. Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein hysbysiad preifatrwydd<"https://gov.wales/about/welsh-government-privacy-notice/?lang=cy"> yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg.

Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our Privacy Notice<<https://gov.wales/about/welsh-government-privacy-notice/?lang=en>> explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Llywodraeth Cymru
Welsh Government

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 0300 025 6000
Ebost cadw@llyw.cymru
cadw.gov.wales

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 0300 025 6000
Ebost cadw@llyw.wales
cadw.gov.wales

planning@simecatlantis.com

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date 26 June 2020

Llinell uniongyrchol
Direct line 0300 0250566

Ebost
Email: cadwplanning@gov.wales

Dear Sir/ Madam,

Pre-Planning Application - Erection of silos, and de-dusting building, extension to rail unloading facility, new above ground conveyors and ancillary development

Location - Uskmouth Power Station

Thank you for your letter dated 1 June inviting our comments on the pre-planning application consultation for the proposed development described above.

Advice

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application.

Our assessment of the pre-application is given below.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW ([planning-policy-wales-edition-10.pdf](#)) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

Assessment

MM092 Goldcliff Moated House Site

The application will be accompanied by an environmental statement (ES) that includes section 9 Historic Environment. Paragraph 9.25 of this section states:-

“For designated historic assets that could be affected by a change within their settings, the study area comprised an area extending approximately 3 km from the edge of the site boundary. The identification of such assets also takes into account the Zone of Theoretical Visibility established as part of the landscape and visual assessment”.

Scheduled monument MM092 Goldcliff Moated House Site is located inside 3km of the proposed development (see figure 9.1 of ES) and figure 8.4k the landscape and visual assessment shows that it will have views of the proposed development. However, this designated historic asset is not mentioned in the text of section 9 or in the more detailed desk-based assessment included as Appendix 9.1 of the ES.

The impact of the proposed development on the setting of scheduled monument MM092 will be a material consideration in the determination of this application (see Planning Policy Wales 2018 section 6.1.23); however, this has not been considered in the ES. Section 9 of the ES is therefore incomplete and needs to be completed

before the planning application is submitted to the LPA. Cadw should also be re-consulted on this statutory pre-planning application prior to the submission of the planning application.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Glamorgan-Gwent Archaeological Trust www.ggat.org.uk

Yours sincerely,

Jenna Arnold
Diogelu a Pholisi / Protection and Policy

Dafydd Williams

From: South East Planning <southeastplanning@cyfoethnaturiolcymru.gov.uk>
Sent: 29 July 2020 14:57
To: Uskmouth Planning
Cc: Dafydd Williams; Mark Barrett (Oxford)
Subject: stat pre app - Uskmouth Power Station (Stat pre app) - NRW Response NRW:01140325
Attachments: Uskmouth Power Station (Stat Pre-App).pdf

CAUTION: This email originated from outside of RPS.

Dear All

Apologies for the delay in sending the formal comments to you. These comments provide further explanation and advice on the matters I've discussed with Cara and sent across last week. Any queries please hesitate to contact me.

Kind Regards
James Davies

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn / Tel: 03000 653098

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

By email to planning@simecatlantis.com

29/07/2020

Annwyl Syr/Madam / Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

BWRIAD / PROPOSAL: USKMOUTH POWER STATION CONVERSION PROJECT

LLEOLIAD / LOCATION: USKMOUTH B POWER STATION, WEST NASH ROAD, NEWPORT

We received a requisite notice under Article 2D of the above Order from you in the post on 1 June 2020. Thank you for allowing us additional time to provide our advice.

Based on the information provided, we have significant concerns with the proposed development. To overcome these concerns, we would recommend to the planning authority that the following requirements should be met before permission is granted and the conditions listed below are attached to the permission. Otherwise, we would object to the planning application.

Requirement 1: Revised air quality assessment to allow the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017;

Requirement 2: Further information to demonstrate the proposal is unlikely to result in a detrimental impact to the maintenance of favourable conservation status of the population of otters (a European protected species) and to allow the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017;

Requirement 3: Further information to demonstrate there are no unacceptable effects on water vole (a nationally fully protected species);

Condition 1: Restrict timing of piling activities to protect notified features of the Severn Estuary Special Protection Area and River Usk Special Area of Conservation;

Condition 2: Secure implementation of mitigation measures in Breeding Bird Survey (prepared by RPS, 24 December 2019);

Conditions 3–6: To ensure an acceptable scheme to deal with land contamination is agreed with the planning authority;

Condition 7: Secure implementation of approved plans demonstrating the primary storage silos are above predicted flood levels.

Statutory Designated Sites – Impacts of Aerial Emissions

We have reviewed the Air Quality Appendices (12.1-6) of the ES to assess potential aerial emission impacts on both European and Nationally important designated nature conservation sites.

We advise that a revised assessment is submitted which considers the impacts from the proposal alone and in combination and addresses the following:

Reporting of values

We have concerns over the approach taken in the assessment which rounds up or down the Process Contributions (PC) values to whole numbers. This approach could screen out potentially significant emissions (i.e. PC <1%) which require further assessment. The values should be reported without rounding up or down.

Critical loads

We question the findings of the assessment as we have identified different values for the critical loads for the relevant Special Areas of Conservation (SACs) within 10km and relevant Sites of Special Scientific Interest (SSSIs) within 2km.

The nutrient nitrogen critical load for the Gwent Levels designated sites (including Newport Wetlands) is 10–20kgN/ha/yr. A key part of the traditionally managed grazing marsh areas within the Gwent Levels are the traditionally drained fields via a system of grips. This can lead to the development of marshy grassland areas in these grips, generally dominated by species of *Juncus* (rush). On this basis we advise the relevant critical load is 10-20kgN/ha/yr, i.e. to be assessed as a type of marshy grassland.

For the Severn Estuary, the Atlantic salt meadows are sensitive and within the 10km screening distance. These are upper saltmarsh and therefore more sensitive to nitrogen deposition than the pioneer saltmarsh. Upper/mature saltmarsh has a nitrogen critical load of 20kgN/ha/yr. Pioneer/lower saltmarsh is more tolerant and has a nitrogen critical load of 30kgN/ha/yr.

We advise that the assessment uses the correct nitrogen critical loads. Therefore, the values in Table 12.5.4 should be revised to reflect this. This means the PCs and Predicted Environmental Concentration (PECs) for some of the designated sites will be above 1% and 70% respectively and so detailed modelling is required because these cannot be screened out as considered insignificant.

Significance thresholds and in-combination assessment

We do not agree that if PC is above 1% and the PEC is below 100% then the emissions are not significant. The *Environmental management – guidance, Air emissions risk assessment for your environmental permit* guidance in terms of significance criteria has been misinterpreted. We refer you to the IAQM [2020 guidance](#) (section 5.5.2.1 and 5.5.3.2).

Furthermore, we advise that for European sites, you need to consider the ‘in-combination’ (combined) impact of all relevant permissions, plans or projects that affect the site. Mindful of recent caselaw (Wealden, 2017), we advise that even if the PC is below 1% an in-combination assessment is required.

Requirement 1: Revised air quality assessment is submitted, based on the above advice, to allow the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 and assess effects on SSSI.

Protected Species

We have reviewed the relevant ES chapter and the following protected species survey reports:

- WATER VOLE AND OTTER SURVEY REPORT – USKMOUTH POWER STATION by RPS dated 4/1/2020;
- GREAT CRESTED NEWT REPORT – USKMOUTH POWER STATION by RPS dated 4/2/2020;
- BAT REPORT – USKMOUTH POWER STATION by RPS dated 30/1/2020;
- DORMOUSE SURVEY REPORT. USKMOUTH POWER STATION by RPS dated 24/12/2019.

We note that bats, otters and water voles were found on/immediately adjacent to the application site.

Otters

Otters are a feature of the River Usk Special Area of Conservation (SAC) located immediately adjacent to the application site, and are also a European Protected Species.

We note that the draft application includes evidence of otters and four otters themselves were seen on Julian’s Pill at the north-eastern end of the site; it is likely that a holt (potentially a breeding/natal holt) is present in this area. Julian’s Pill is a known commuting route for

otters, which is densely covered in parts. Otters are known to make use of areas adjacent to the treatment works and access Newport Wetlands via this important green corridor.

We concur with section 5.2.4 of the otter survey report that all suitable habitats within the application site could be used by otters hunting for food or resting within substantial areas of dense scrub and herbaceous cover (especially in the south-western section of the site and in the adjoining Newport Wetlands to the south). However, paragraph 7.126 of the ES does not accurately report the findings and conclusions of the otter survey report. Paragraph 7.226 of the ES continues to refer to 'the absence of any dense cover suitable for use by otter' on site; however, reference to the otter survey results map clearly shows that four long stretches of the eastern boundary ditch were too dense in vegetation to survey.

Therefore, we consider that the presence of a significant otter holt (i.e. potentially a breeding/natal holt) cannot be ruled out in these areas. We recommend the ES is amended to address these points.

In terms of mitigation measures, the ES (paragraph 7.225) makes reference to 30m works stand-off distances for non-breeding holts. However, if breeding/natal holts are present, a far greater stand-off distance would need to be applied. It appears that the proposed works are generally concentrated in the southern part of the application site. The ES should assess whether any activity within the development site (including associated construction works) could effect potential breeding/natal holts to the north/north east of the site. We advise the ES includes appropriate stand-off distances on the assumption there is a breeding/natal holt present.

With reference to the works close to the south-eastern boundary ditch and Lamby Lake (principally the primary storage silos), we also seek confirmation of the works stand-off distance that will be applied. This needs to be sufficient to minimise likelihood of disturbance of otter in these areas.

We note the proposal for an ecologically/environmentally sensitive lighting scheme (paragraph 7.346 of the ES), which will help ensure otters can continue to use suitable habitat around the site. We advise that due to the importance of the green corridors surrounding the application site, a lighting strategy with broad principles is submitted prior to determination of the application. This should demonstrate that light sensitive corridors (including the River Usk, Julian's Pill and other site boundary ditches) are not adversely affected as a result of the proposal (i.e. construction and operational stages). If this is satisfactorily demonstrated, then we consider full details of lighting, based upon the strategy's principles, can be secured through a pre-commencement condition. At this stage, we would expect the detailed lighting scheme to include:

- Details of the siting and type of external lighting to be used;
- Drawings setting out light spillage in key sensitive areas (for example, along the banks of the River Usk (SAC), and green infrastructure along Julian's Pill, the south-eastern boundary ditch and in the southern part of the site);
- Details of lighting to be used both during construction and/or operation.

In summary, we consider there is insufficient information within the application to confirm the likely effects of the proposal on otters.

Requirement 2: We require information, as described above, which 1) demonstrates the proposal is unlikely to result in a detrimental impact to the maintenance of the favourable conservation status of otters and 2) allows the competent authority to carry out an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017.

Water Voles

Water voles are fully protected under the Wildlife and Countryside Act 1981 (as amended). We note that evidence of water voles was recorded in ditches along the south-eastern boundary of the site. We also note that piling proposals for the coal stockyard area may require displacement of water voles from a section of the ditch.

A detailed assessment of impacts from the proposal on water voles has not been provided.

Requirement 3: In order to determine the effects of the scheme on water vole, further information is submitted to support the application in the form of a Water Vole Conservation Strategy.

This should include details of the proposed works; an assessment of the likely effects on water voles from these works (including a description of the all habitats to be affected); and the measures to be put in place to offset the predicted effects, including long-term habitat management and species monitoring, if necessary. If any mitigation measures are required on land beyond the site boundary, the application should demonstrate that there is a reasonable prospect of the applicant being able to manage this land for those conservation purposes. The planning authority will be required to control this, either through appropriate Grampian planning conditions or, if necessary, planning obligations.

Bats

We note that a number of non-breeding pipistrelle roosts were found across the application site, as detailed in section 4.1 of the bat survey report.

It appears that none of the identified roosts will be directly lost to the development proposals, but that impacts (particularly to those roosts in the flyover) may come in the form of disturbance from lighting and noise.

In that context, we welcome the proposals to install a number of additional bat boxes as mitigation within and outside the application site. There should be a reasonable prospect of the applicant being able to install boxes on land outside of the application site, which may need to be controlled by the planning authority. We recommend that the application demonstrates this and indicates the number and type of boxes that will be installed and proposed locations for installation, for completeness.

Statutory Designated Sites – Impacts of Piling

Severn Estuary Special Protection Area (SPA) and River Usk SAC

We note the shadow HRA states piling will be required in order to construct the new fuel silos in the southern part of the site.

We consider piling activity could have likely significant effects on features of the Severn Estuary SPA and features of the River Usk SAC without appropriate mitigation or avoidance measures.

Bird Features

Paragraph 4.2.17 explains that methods of piling are yet to be defined but confirms that 'elevated noise above 55dB could alter the behaviour of wildfowl using waterbodies and reedbed closest to the development area'. Therefore, we consider the shadow HRA (paragraph 4.2.19) is premature to conclude 'no likely significant effect is predicted on any wintering bird populations as a result of noise during construction'. However, we note the paragraph continues 'this will be fully reviewed against the detailed specifications of construction and piling in the coal stockyard once available with the assessment provided as an addendum to this shadow HRA assessment'.

We agree that further assessment would be needed to ensure piling activities do not significantly affect notified features of the SPA, specifically a noise assessment once the type of piling is known. However, a planning condition restricting the timing of piling, to avoid the sensitive winter period between October to February (inclusive), and therefore avoid any potential effects, would also be acceptable. See condition 1 below.

Fish Features

There is also a risk from piling activities on notified fish features in the River Usk SAC. In order to cause least disturbance to migrating shad and salmonid fish, piling should only take place from July to February (inclusive), unless otherwise agreed in writing with NRW/LPA.

Therefore, our concerns over piling impacts on European Site features can be addressed through securing the following planning condition:

Condition 1: No piling shall be carried out between July and February (inclusive) to protect notified fish species of the River Usk Special Area of Conservation and notified bird features of the Severn Estuary Special Protection Area, unless otherwise agreed in writing with the local planning authority.

Justification: To avoid the potential for disturbance of notified features of European Sites (SAC and SPA) where this cannot be controlled through another authorisation.

If these restrictions are not practical and there is a need to carry out piling during this period, then further information will be necessary, to demonstrate how it is proposed to mitigate likely significant effects on European sites.

Habitats Regulations Advice

As advised above, in respect of aerial emissions, protected species and piling works, we have concerns that significant effects from the proposed development on the River Usk SAC and the Severn Estuary SAC and SPA cannot be ruled out based on the submitted information.

It will be for the planning authority to conclude whether the proposed development is likely to have a significant effect on a European site. If so, they will be required to carry out an appropriate assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. We should be consulted on this assessment prior to any consent being granted.

Newport Wetlands SSSI/NNR

We have reviewed the relevant ES chapter and the following surveys:

- USKMOUTH POWER STATION Breeding Bird Survey Appendix 7.5 (RPS 2019)
- USKMOUTH POWER STATION Coastal Bird Survey Appendix 7.6 (RPS 2020)

We consider the bird surveys are adequate given the nature of the proposals. We advise that the recommendations in the Breeding Bird Survey (paragraphs 4.1.8-9) should be secured through a planning condition.

The Breeding Bird Survey concludes the following mitigation is required and needs to be undertaken by a suitably qualified ecologist:

- pre-works breeding bird surveys;
- implementation of suitable no works buffers around the active nests until natural nesting conclusion has been reached (buffer distance to be confirmed based on species in question and stage of nesting);
- Depending on proximity of works to adjacent wetlands, liaison with the RSPB regarding any nests that may be at risk of disturbance from development;
- Compensation provided if breeding habitat is lost due to the development. The compensation will be dependent on the nature of the habitat lost and the bird species using such habitats.

Condition 2: Secure implementation of the mitigation measures described in paragraphs 4.1.8 and 4.1.9 of the Breeding Bird Survey prior to the commencement of development.

Justification: To protect bird features of the Newport Wetlands SSSI/NNR.

Further advice

It would be very beneficial if you could discuss these mitigation measures with NRW's reserve staff, as well as RSPB, to avoid any other potential impacts on schedule 1 species

breeding on the Newport Wetlands Reserve. The point of contact would be Tom Dalrymple (Thomas.Dalrymple@cyfoethnaturiolcymru.gov.uk)

Groundwater Protection and Land Contamination

We have reviewed the following information:

- Uskmouth Power Station Conversion Project – Environmental Statement: Volume 1 – Main Text. RPS Group, OXF11035, V3 Final for PAC, May 2020;
- Outline Drainage Strategy Report – Simec Uskmouth Power Station Conversion SUP. RPS Group, P03, April 2020;
- Uskmouth Power Station Development – Appendix 5.1 - Preliminary Risk Assessment. RPS Group, File Name: 200120 R JER8425 GR Uskmouth Power Station PRA Report_Rev0v1, May 2020.

Please note in section 5.4 of main ES, the latest version of legislation should be referred to, i.e. the Groundwater Regulations 1998 and 2009 are no longer active and have been superseded by the Environmental Permitting Regulations 2016 under Schedule 22.

We note that a large proportion of the development will be conversion of existing buildings and that there will be limited demolition. We agree that targeted site investigation and risk assessment for controlled waters is required, as recommended under section 9.1.2. of Appendix 5.1 - Preliminary Risk Assessment. Given that piling will be required at the site for storage silo foundation, a piling risk assessment is strongly recommended to be included in the risk assessment.

Therefore, we would recommend to the planning authority that the following conditions are attached to the permission. Otherwise, we would object to the planning application.

Condition 3: No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
 - i.all previous uses
 - ii.potential contaminants associated with those uses
 - iii.a conceptual model of the site indicating sources, pathways and receptors
 - iv.potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development, as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 4: Prior to the operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification: To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to operation, to minimise risk to both future users of the land, neighbouring land, as well as to controlled waters and ecological systems.

Condition 5: Prior to the operation of the development, a long-term monitoring plan for land contamination shall be submitted and approved in writing by the Local Planning Authority. The long-term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken
- Timescales for the long-term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required
- Timescales for submission of monitoring reports to the LPA e.g. annually
- Details of any necessary contingency and remedial actions and timescales for actions
- Details confirming that the contingency and remedial actions have been carried out.

The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

Justification: A long term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on controlled waters.

Condition 6: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Reason: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

Advice to applicant:

We recommend developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency's '[Guiding Principles for Land Contamination](#)' for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Refer to the [Environment Agency's \(2018\) 'Approach to Groundwater Protection'](#)

Flood Risk

The planning application proposes highly vulnerable development. The site is predominantly within Zone C1 of the Development Advice Map (DAM) contained in TAN15.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, it will be for the LPA to determine whether the proposal meets the tests set out in criteria (i) to (iii). The final test (iv) is for you to demonstrate that the potential consequences of flooding can be managed to an acceptable level.

Based on the information in the flood consequences assessment (FCA) in Appendix 6.1, we consider the FCA shows that the risks and consequences could be managed to an acceptable level, provided the storage silos are raised above the design flood event.

The FCA has provided an assessment of the predicted flood risks and consequences to the site as a whole. Paragraph 6.6 states during the 0.5% (2090) defended scenario, the northern area of the site may be impacted by tidal flooding to a depth of 0.92m; the central area of the site may be impacted by flooding to a depth of 0.27m; and the southern area of the site may be impacted by flooding to a depth of 1.41m. We are satisfied that this can be used as the design flood event.

The FCA explains that in terms of built development, the proposal will include the primary storage silos. These will be constructed on the existing coal storage area. The FCA states

the footprint of storage silos will be smaller in comparison to the existing external storage area. The remaining areas of the existing coal storage area being returned to green infrastructure.

The FCA proposes to raise the silos approximately 3m above the existing ground level and therefore above the predicted level of flooding. We therefore request the following condition is imposed on any permission granted:

Condition 7: Secure the implementation of approved plans which demonstrate primary storage silos are above predicted flood levels.

Paragraph 7.5 of the FCA concludes that as the risk of flooding is of tidal nature, there is no requirement to provide floodplain compensation within the site. As the proposed footprint of the development is smaller, we raise no concerns in this regard.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

James Davies

Uwch Gynghorydd - Cynllunio Datblygu / Senior Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

CC Dafydd Williams (RPS)