

Our ref: JPW1248

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Ms J Davidson
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Newport City Council
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Godfrey Road
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Dear Joanne,

Planning application reference: 20/0748 | Erection of silos and de-dusting building, extension to rail unloading facility, new above ground conveyors and ancillary development

Regarding the above and following my letter dated 12 October 2020 sent via email, our virtual meeting on 14 October 2020, the latest consultation response of the Highway Officer dated 16 October 2020 and your email dated 18 October 2020, please find enclosed the following additional information as requested:

- Supplementary Ecology Note – Ecology Response to Natural Resources Wales ('NRW') consultation letter dated 9 October 2020 and enclosure (reference: OXF11701 ECOLOGY RESPONSE TO NRW 201026_v0);
- Outline Water Vole Conservation Strategy (reference: OXF11701 Uskmouth Outline WVS 201026_v1);
- Lighting Statement (reference: BRM09193 v2);
- Uskmouth Power Station – Parking Facilities (drawing reference: 001); and
- Extract Environmental Statement Figures 8.6a to f.

A summary of the information enclosed is provided below together with further explanation regarding the design of the proposed silos and conveyors as requested.

Natural Resources Wales 'Requirement 1'

In our previous letter and as discussed during our virtual meeting on 14 October 2020, we requested that NRW reconsiders its 'Requirement 1' and provide the Local Planning Authority ('LPA') with appropriate advice that the air emissions associated with the development are capable of effective regulation through the environmental permitting regime.

The planning application proposes operational, i.e. physical development only at an existing thermal electricity generating station. It is the operational development only that the LPA is being asked to determine. The emissions changes as a result of a change of fuel do not require planning permission (a change of fuel is not a change of use requiring planning permission) and fall within the jurisdiction of the Environmental Permitting Regulations.

As stated in our previous letter and noted in our meeting on 14 October 2020, Planning Policy Wales ('PPW') paragraph 1.20 states the planning system should not be used to secure objectives that are more appropriately achieved under other legislation. The aim should be to maintain the principle of non-duplication, wherever possible. The planning application has been 'parallel tracked' with the environmental permitting variation application for this reason.

We trust, therefore, no further information is required in this regard.

Natural Resources Wales 'Requirement 2': Otters

The Supplementary Ecology Note enclosed provides a detailed description of the sensitivity of otter habitats on the site and notes that all habitats with the potential to have high sensitivity for otter are located a significant distance from the construction activities and piling locations, which are primarily focussed on the construction of the storage silos.

The Supplementary Ecology Note presents the noise contour modelling for an augured method of piling for the proposed development and recommends measures to control and/or prevent disturbance.

It also notes that, during operation, activities close to the RSPB Wetland Reserve boundary ditch would be limited to security and maintenance operations. Activity around the silos in the hours of darkness at times when otters could be using the ditch are expected to be very limited. Three of the silos are set back from the ditch (more than circa 50m) with little or no potential for impacts on otter activity during construction and operation.

The boundary ditch will fall within a dark corridor with the lighting specifications designed to prevent light spill onto the ditch or banks. Task lighting would be required if operation and maintenance activities associated with silos are required during the hours of darkness. The layout includes a 15-20m stand-off between the top of the ditch bank and southernmost silo once constructed. During construction a 7-10m stand-off will be employed from the top of bank with exclusion fencing to remain in place for the full duration of construction activities in the coal stockyard. The full 10m stand-off will be maintained with the exception of any pinch-points.

The above could form the basis of planning conditions or Construction Environmental Management Plan (CEMP) accordingly.

In conclusion, the supplementary ecology note states the closest areas of extensive dense scrub cover with the potential to support a holt or frequently used resting place are located over circa 300m from construction areas and piling locations. There is no potential for disturbance of breeding/natal holt or daytime resting places. During operation, management of the ditch habitat and operational boundary ditch would cause very infrequent disturbance to the ditch during the daytime. Maintenance activities for the silos may be infrequently required during the night and would be conducted using task specific lighting. A minimum 15m stand-off will be created between the top of the bank and southernmost silo which separates the operational working area from the ditch corridor along which otters could move. Access to this area will be controlled.

There is negligible potential for the development to cause a detrimental effect on the local otter population or adversely affect its favourable conservation status.

Natural Resources Wales 'Requirement 3': Water Vole

An engineering, procurement and construction ('EPC') contractor has not been appointed at this stage. Therefore, an Outline Water Vole Conservation Strategy is enclosed setting out measures that would be adopted as part of the detailed design and the deliverability of the proposals. This document includes:

- Information on the potential effects on water voles and ditch habitats;
- Defines the precautionary measures that would be put in place; and
- Outlines the deliverability of the mitigation, enhancement and long-term habitat management on land in the ownership of the developer.

Mitigation measures are only proposed for land within the boundary of the power station and within the control of the applicant. The strategy demonstrates how species protection would be delivered alongside permanent enhancement of sub-optimal ditch habitats to help maintain the water vole population during construction. The strategy includes a commitment to develop ditch habitat management for water vole and monitoring of the population to document outcomes and ensure the value of the boundary ditch for water vole is enhanced and promoted over the lifetime of the development.

The EPC contractor will be required to comply with an Outline Water Vole Mitigation Plan, which can be requested by planning condition and will be further developed and confirmed at the detailed design stage. Detailed specifications and a programme will be defined covering all the protection measures and enhancements designed around duration and type of piling and construction. These will be informed by an up to date water vole population survey along the whole of the eastern section of the boundary ditch. All commitments in the outline strategy will be fully adopted in the detailed mitigation plan.

The delivery of the strategy will help maintain the conservation status of the water vole population during construction and provide permanent enhancement of the ditch habitat over the operational life of the power station thus providing an overall net gain.

Other Natural Resources Wales requirements: Lighting Strategy

The enclosed Lighting Statement has been prepared in response to NRW comments regarding otter and bats and sets out broad lighting requirements for both construction and operation. The Lighting Statement sets out the environmentally sensitive parameters that will be achieved by the detailed Lighting Plan, which can be required by planning condition. The Lighting Statement corridors 'dark corridors' around the site coinciding with 'green corridors' and other habitats suitable for bats and otter.

A final detailed lighting plan can be provided via condition and following the appointment of an EPC contractor. We can assist the LPA in developing an appropriately worded lighting condition if that would be helpful.

Other Natural Resources Wales requirements: Bats

Regarding bats, specifically, the enclosed Lighting Statement protects the dark context of the flyover bridge on site.

A minimum of six additional tree mounted bat boxes will be installed within the site.

Other Natural Resources Wales requirements: Statutory Designated Sites – Impacts of Piling

As set out within the enclosed ecological note, noise modelling demonstrates that auger piling would cause no impact on:

- Wintering birds;
- Otter; or
- Migratory fish.

In conclusion, therefore, the proposed piling method ensures that there would be no likely significant effect on features of the Severn Estuary Special Protection Area (birds) and features of the River Usk Special Area of Conservation (otter and migratory fish). Consequently, no seasonal restrictions on the timing of works are required.

Highways

The latest response of the Highway Officer dated 16 October 2020 stating no objection subject to a Travel Plan, Parking Layout Plan and a CEMP, which can be secured via condition, is welcomed. However, in our subsequent discussions you mentioned how a Parking Layout Plan would be helpful in terms of the presentation of the application. Please find enclosed the drawing 'Uskmouth Power Station – Parking Facilities' (drawing reference: 001) indicating the 147 existing formal car parking spaces available on site

together with additional space for parking up to 170 additional cars, if required, accordingly. As stated in previous correspondence, the available parking on site is considered sufficient for the proposed development.

Request for further information regarding silo and conveyor system design

In your email dated 18 October 2020, further information was requested regarding silo and conveyor system design, broadly summarised, as follows:

- What alternative material is available for the construction of the silos?
- Why was it decided to arrange silos in a line rather than a square?
- What opportunities are there for trying to lessen the visual impact of the silos in terms of colour, layout and finish?
- What colour finish would be optimal for the proposed conveyors?

These issues are discussed below.

Alternative materials for the silos

Slipform concrete is the only feasible construction technique for the number and scale of silos proposed. The only possible alternative for the scale required would be steel, which would be no different in size, would be prohibitively expensive and very difficult to maintain in a coastal environment.

Silo arrangement

Regarding the linear layout, the silos must be filled from the top to ensure the 'oldest' fuel at the bottom is used first. .

A linear silo arrangement and filling system via conveyors is the simplest and optimal design as it optimises the conveyor length and minimises the number of junctions. A square configuration of 4 silos increases the complexity of the conveyors and silo filling system by increasing the number of conveyor junctions. An increased number of junctions, where the fuel material will need to change direction by dropping from one conveyor to another, increases the chances of loss of material, dust and jamming or failure of the conveyor system. Jamming or failing of conveyors while a power station is operational, together with increased maintenance and repair requirements involving working at height, increases health and safety issues and reduces operational reliability. Fewer potential points of failure is a critical factor in the design and operation of power stations.

Opportunities for trying to lessen the visual impact of the silos in terms of colour, layout and finish

Regarding other possible means of lessening visual impact, the volume of the silos is fixed by operational requirements. However, consideration was given in the early design stages to reducing the height of the silos. This requires a proportional increase in diameter to maintain storage capacity. Reducing silo height and increasing silo diameter, bearing in mind the optimal linear layout of the silos, decreases the distance buffer from public vantage points and higher value habitats near the perimeter of the site, including the RSPB Wetlands Reserve, both in terms of construction and operation. This would in turn, negate any visual benefits in terms of a reduction in height and potentially introduce additional ecological issues. Shorter and wider silos would also increase the silo base footprint and increase the number of structural piles needed. potentially increasing the ecological impact during construction whilst introducing more complex arrangements at the base of the silos for handling and transport of the fuel pellets.

Ideally, taller silos than those proposed would be installed and would have resulted in a significant cost saving. This is primarily due to less complex arrangements at the base of the silo for extraction, handling and transport of the fuel pellets. However, silos shorter than the main Uskmouth Power Station boiler house have been proposed as a key design parameter to ensure their scale is less than the existing buildings on or near the site.

Regarding the colour of the silos, the likelihood of achieving a consistent colour across the concrete silo exterior using a dye is low and would make the structure darker. Therefore, cladding would be the only other

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potential option for change of colour, but this would also increase the size of the silos and introduce a need for additional maintenance including working at height. In our opinion, as the photomontages within the Environmental Statement ('ES') Figures 8.6 a to f enclosed show, the matt light grey colour of the concrete silos is optimal in terms of blending tall structures in with UK skies. Cladding the silos in another material would therefore seem to be an unnecessary and unsustainable addition.

What colour finish would be optimal for the proposed conveyors?

It is agreed that the existing white conveyors are prominent when viewed against the darker backdrop of the existing power station. The Applicant is amenable to changing the colour of the proposed conveyor system if a more suitable colour can be identified. However, the proposed conveyors will be viewed from several angles as shown within the photomontage Figures 8.6a to f of the ES (enclosed for your convenience). We believe that the light grey colour of the proposed conveyors is optimal for tall structures in terms of 'blending' into the backdrop of UK skies, which is likely to be the most widely experienced backdrop in views.

It is also noted within the photographs accompanying your email that the context of the Uskmouth site is an existing industrial landscape within which electricity generating and transmission infrastructure is very apparent. The proposed silos and conveyor system, while bringing about some localised change in views, does not significantly alter the character of the site or the area, in our opinion.

In overview we do not believe there is an alternative layout or better colour for the primary silos than that selected. The Applicant would be happy to consider alternative colour finish to the conveyor system if an improvement can be identified.

Given the constraints in terms of area and ecology within the application site, additional tree planting as mitigation is not possible unfortunately. However, the Applicant would be happy to enter a dialogue on a voluntary basis with RSPB to discuss management and enhancement of the boundary planting on RSPB land to encourage growth or means of screening at that location, where it would be most effective.

In addition to our written response on these matters we would be happy to convene another virtual meeting to discuss further.

Summary and conclusion

Further to the above and the submission of additional details enclosed, it is considered that the issues identified during the consultation period have been satisfactorily addressed and we look forward to your consultees confirming the same. Appropriate conditions can be imposed to control impacts of the detailed design of the development following the grant of planning permission and the appointment of an EPC contractor.

I trust that, following the re-consultation period, it will be possible for the application to be reported favourably at the next available Planning Committee meeting on 2 December 2020. However, should any issues arise or if you need anything further please do not hesitate to contact me.

Yours sincerely,
for RPS Consulting Services Ltd



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cc: Ms C Donovan, Simec Uskmouth Power
Enc. As above.