

Our ref: JPW1248

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Joanne Davidson
Regeneration, Investment and Housing
Newport City Council
Civic Centre
Godfrey Road
Newport
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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

In our letter dated 18th December we committed to provide you with the details to address the two outstanding matters. Prior to the determination of the application we would also draw your attention to the objectives of Low Carbon Wales and the latest version of the National Development Framework. Firstly, the conclusions of the work undertaken to address the final two requirements are as follows:

NRW Requirement 2 – otters and lighting

Further to the NRW comment about the railway line and Julian's Pill additional information is provided in relation to the lighting requirements along the railway line during the operation of the power station.

Regarding final levels of artificial light a lighting design has been prepared. The existing lighting columns are situated in the centre of the railway line set back from the habitat corridors on either side. These locations will be retained with the existing lights to be replaced with modern specifications. The proposed lighting specification is LED 400mA. The lights are downward facing, directing light onto the track where it is needed while avoiding any upward light spill.

A lux contour plan has been prepared for the lighting specifications showing the 0.1, 1.0, and 5.0 lux contours along the length of the railway (BRM09193-RPS-xx-xx-DR-E-6301) and this is attached to this letter. This shows that there is a sharp cut off from 5 lux to 0.1 lux between the locations of the lights within minimal lighting of the edges of the railway line.

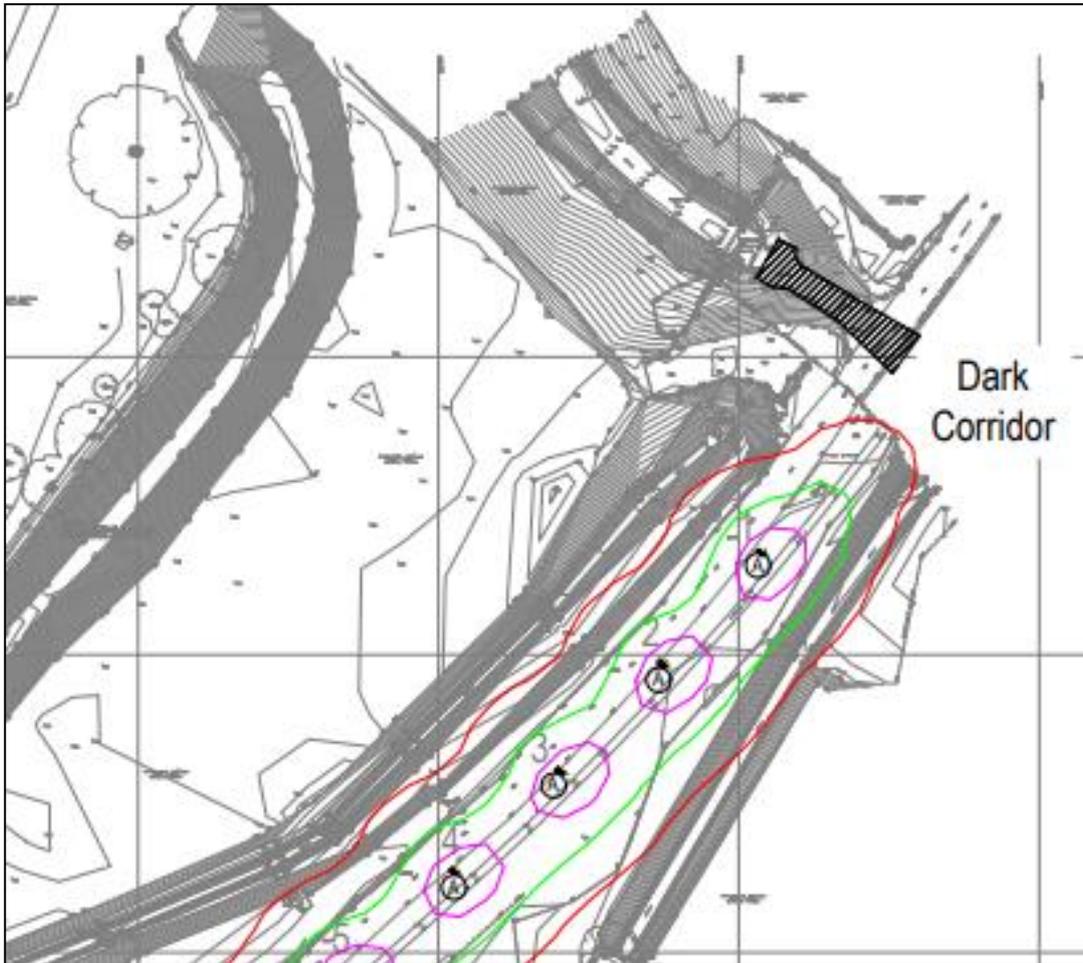
At the northern end of the site the security fenced boundary of the power station is aligned to the southern side of Julian's Pill. Otters move across the railway line on the southern side of the boundary between the pill and the reed where the main channel is gridded (and periodically subject to significant water flow). A second otter path goes into dense reed on the eastern boundary of Julians Gout Woodland, beyond which Western Power Distribution have recently cleared a swathe of bramble and scrub adjacent to the estuary.

The closest lighting column is set back 15m from the boundary gate and otter path. This lighting column will be switched off and would only be required in the event of emergency use at night. Excluding the emergency lighting, the closest lighting column will be set back from the otter path by 25m creating a minimum 10m wide dark corridor below 0.1 lux on the southern side of Julian's Pill with a further 5m wide buffer below 1 lux. This is indicated on Figure 1 below.

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The lighting on the railway line will be operational for between 2 and 3 hours per night for the duration of deliveries. The whole of the railway line will remain dark during all other night time hours.

Figure 1 - Annotated figure of the Julian Pill – Reen dark corridor



Lux Contours: Pink – 5 lux; Green – 1 lux; Red 0.1 Lux

NRW Requirement 3 - water vole mitigation, habitat enhancement, management and monitoring

Targeted enhancement of the ditch habitats for water vole will be implemented 12 months in advance of construction and the protection of the ditch, and the water vole population, is being fully addressed through buffer zones and working methods which will be employed for the duration of construction activities in the coal stockyard. The proposed development offers the opportunity to substantially increase the value of the western boundary ditch, to provide permanent enhancement of the ditch habitat, supported by ongoing habitat management over the lifetime of the development. Its early implementation will provide alternative habitats for water vole during any short-term disturbance associated with piling during construction.

The water vole mitigation and enhancement strategy submitted with this latter explains the proposals in more detail.

Low Carbon Wales

The pellet used for generation at Uskmouth post-conversion is engineered and produced to a closely controlled specification that ensures it is suitable for transport, milling and combustion. This facilitates the efficient extension of the life of an existing power station, rather than requiring a new purpose-built power station to supply energy.

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The Uskmouth conversion meets the Welsh Government's definition of renewable and low carbon energy. Prosperity for All: A Low Carbon Wales:

- *We need low carbon electricity to become the main source of energy in Wales.*
- *Policy 74 - We will continue to support the generation of renewable energy from the Anaerobic Digestion (AD) of food waste, energy recovery from waste wood in biomass power plants and the energy recovery of residual waste (the renewable element) and the utilisation of landfill gas.*

The Uskmouth project makes use of an existing facility with minimal carbon generation associated with construction to produce 220MW of low carbon energy. The alternative to generate 220MW of low carbon energy would require a new build gas fired power station or gas engines, circa 100 wind turbines or approximately 400 hectares of solar panels.

Overall Planning Policy

The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs (Future Wales - The National Plan 2040). In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency (Policy 74 Future Wales - The National Plan 2040).

Planning authorities should also look favourably on any renewable and low carbon energy generation proposals designed to serve clusters, such as district heating systems and high efficiency energy recovery from waste, or the provision of an integrated network of waste recycling or collection (Planning Policy Wales 10).

In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision-making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered. In all cases, considerable weight should be attached to the need to produce more energy from renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets (Planning Policy Wales 10). Uskmouth power station is already in place immediately adjacent to a gas fired power station within a heavily industrialised area.

Summary

We addressed the distinction between planning permission and permitting in the letter of the 18th December. In summary it's our understanding that all matters have now been addressed to enable the planning application to be determined. We look forward to continuing to work with you in the new year.

Yours sincerely,
for RPS Consulting Services Ltd



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