PLANNING STATEMENT

Uskmouth Power Station Conversion Project

JPW1248
Planning Statement
1
May 2020

rpsgroup.com

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
0	For PAC	Dafydd Williams	Darren Parker	Darren Parker	21 May 2020
1	For PAC	Dafydd Williams	Daniel Smyth	Daniel Smyth	27 May 2020

Approval for issue

Daniel Smyth	27 May 2020

Prepared by:

RPS

Dafydd Williams
Associate

2 Callaghan Square
Cardiff
CF10 5AZ

T +44 2920 668 662
E dafydd.williams@rpsgroup.com

Prepared for:

SIMEC Uskmouth Power Ltd

Cara Donovan
Senior Environment and Consents Manager

Uskmouth Power Station
West Nash Road
Newport
NP18 2BZ

T +44 7469 854 528
E cara.donovan@simecatlantis.com

Contents

Tables

1 INTRODUCTION

1.1 This Planning Statement has been prepared by RPS Consulting Services UK & Ireland on behalf of SIMEC Uskmouth Power Limited ('SUP') in support of a planning application for erection of silos, conveyors, de dusting plant, extension to rail unloading shed and ancillary development ('the Proposed Development'), which is part of the Uskmouth Power Station Conversion Project to convert Uskmouth B Power Station, West Nash Road, Nash, Newport NP18 2BZ ('Uskmouth Power Station') from combusting coal to fuel pellets derived from non-recyclable waste.

1.2 This Planning Statement should be read in conjunction with all other submitted planning application documents. A detailed description of the site and the proposals is contained within the Design and Access Statement (DAS). Furthermore, as operational development only is proposed within the planning application, the primary planning considerations relate to design and access. Again, an assessment of the proposal in these regards is contained within the DAS and is not replicated here. Instead, as requested within the Local Planning Authority's (LPA) Environmental Impact Assessment (EIA) Scoping Opinion dated 13 February 2019, this Planning Statement focusses on the procedural matters raised and the key planning policy objectives and sustainability benefits the proposed operational development will facilitate.

2 BACKGROUND

2.1 Uskmouth B Power Station began operation in 1959 with a capacity of approximately 360 MW. Since this time, it has been under various ownerships and subject to several phases of refurbishment. SIMEC Atlantis Energy Limited ("Atlantis") is the developer of the Uskmouth Conversion Project. The Uskmouth power station is owned by SIMEC Uskmouth Power Limited ("SUP"), a wholly owned subsidiary of Atlantis.

2.2 Uskmouth Power Station remains a fully permitted coal fired power station. It has not generated electricity on coal since a technical fault in April 2017 and due to the planned conversion project. Since this time, SUP has retained staff with critical skills for preservation and maintenance of the plant in readiness for the plant conversion and return to service. The conversion project will return the existing Uskmouth plant to service and extend its operating life for a further 20 years. The Uskmouth Conversion Project proposes to convert the existing coal fired power plant at Uskmouth power station to a plant that would combust waste derived fuel pellets. Uskmouth power station has continued to make significant investment and progress towards the conversion with the Front End Engineering Design (FEED) to repurpose the existing site to combust waste derived fuel pellets. Post conversion the power station will provide up to 220 MW baseload electricity to the distribution network and potentially supply electricity to existing and new large scale industrial users in Newport.

2.3 Reusing existing or former coal fired power stations, similarly, to combust biomass has been successfully undertaken elsewhere, including at Drax, Lynemouth and Studstrup power stations. However, the Uskmouth Power Station Conversion Project in Newport represents a world first, ground-breaking project to convert a coal fired power station to generate electricity using waste derived fuel pellets. Uskmouth Power Station will provide baseload generation that will complement intermittent generation from increased renewable energy production within the UK energy system. The Uskmouth Power Station Conversion Project, while meeting Welsh Government's definition of renewable energy[1], will also displace primary fossil fuel materials (i.e. coal or gas) which would otherwise have been used to generate electricity elsewhere within the UK energy system.

2.4 The proposed development will facilitate the delivery of the conversion project, as a whole, and therefore contribute to the following key planning policy aims and objectives:

- Energy security;
- Energy recovery and zero landfill;
- Sustainability, including:
  - Efficient use of land;
  - Reuse of previously developed land and transport infrastructure;
  - Integrated transport systems and encouraging the co-location of other uses;
  - Use of low carbon energy sources;
  - Minimisation, re-use and recycling of waste;
  - Minimising risk of and from flood, sea level rise and impact of climate change;

[1] See Welsh Government Practice Guidance: Planning for Renewable and Low Carbon Energy - A Toolkit for Planners, September 2015, section 1.4

- Improving facilities, services and overall social and environmental equality of existing and future communities;
- Encouraging economic diversification;
- Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment.
- Conserving and ensuring the efficient use of resources.

2.5 National Grid's Future Energy Scenarios (2019) anticipates the UK's electricity consumption is to increase by up to 48% by 2050. Much of this additional demand is anticipated to result from the future widespread decarbonisation of transportation and heating, which rely on primary fossil fuels currently, to achieve the UK and Welsh Governments' ambitions of 'net zero' greenhouse gases by 2050. The proposed development, by facilitating the conversion project, will support this objective by providing baseload electricity to the network to balance volatility caused the increased intermittent renewable energy sources needed to achieve 'net zero' and displace the need to build new primary fossil fuel power stations, e.g. gas.

2.6 While proposing operational development only and not a change of use or waste application, as (in planning terms) the dominant use of the site will remain thermal combustion to generate electricity, the conversion project (which is enabled by the proposed development) will provide energy recovery and the fuel pellet feedstock will assist in diverting waste from landfill or other disposal routes and so aligns with Wales' ambition for 'no additional landfill for municipal waste in Wales by 2026'.

Planning History

2.7 Consent for 'Uskmouth B Generating Station' was granted on 30 April 1957 (reference: 64/2/49) The original consent permitted the installation of a 360 MW generating station at the site.

2.8 Consent for '*a recirculating cooling water system incorporating mechanical draught cooling towers and the necessary buildings and civil engineering works'* was granted on 11 March 1999 (reference: AAH/1/80).

2.9 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 (reference: 16/0257). This consent is now under separate ownership and not related to the Uskmouth Power Station consents.

Environmental Impact Assessment Screening Opinion

2.10 An Environmental Impact Assessment (EIA) screening request for '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' was submitted on 19 October 2018.

2.11 An EIA Screening Opinion (reference: 18/1016) was subsequently issued by the Local Planning Authority (LPA), Newport City Council, on 29 October. It concluded 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 and, with reference to Schedule 3 of the Regulations, that the proposal is capable of having significant environmental effects and constitutes EIA development.

2.12 Regarding the above, it should be noted that at the time it was proposed to import much of the fuel by road and the conclusion that the proposal is Schedule 2 development was as a direct result of the impact this road congestion would cause. The proposal has been developed since then to remove the need to deliver fuel by road and hence this effect has been mitigated. The applicant has opted to submit the proposal as an EIA development to ensure a robust assessment can be undertaken by the LPA when considering the planning application.

2.13 At page 2 of its Screening Opinion the LPA confirmed it was satisfied that the proposed change in fuel source would not amount to a change of use.

Pre-Application Advice

2.14 A request for pre-application advice from the LPA was submitted on 7 May 2019 regarding two proposals at the Uskmouth Power Station site, including:

- *Full planning application for the conversion of Uskmouth B Power Station to combust refuse derived fuel pellets, erection of fuel silos, material handling conveyors, road offloading building and other ancillary development (known as 'SUP'*); and

- *Outline planning application for the erection of a waste pelleting plant, material handling conveyors, silos and ancillary development (known as 'SSFP'*).

2.15 Pre-application advice provided by the LPA on 16 July 2019 considered that the change in fuel source at the power station is not a material change of use in planning terms.

2.16 The proposal for a pelleting plant was later abandoned.

2.17 The proposed need for delivery of fuel by road was also abandoned with the exception of biomass.

Environmental Impact Assessment Scoping Opinion

2.18 A request for an EIA Scoping Opinion for 'Conversion of Electricity Generating Station to Combust Alternative Fuel and Associated Development' was submitted to the LPA on 23 December 2019.

2.19 On 13 February 2020 the LPA issued a Scoping Opinion. Within it at paragraph 7.1 the LPA stated:

"You should further note the Council's concerns over the baseline for this proposal in terms of the generating potential for the existing site. If that is realistically nil then clearly the proposal would be adding well over 10 megawatts of generating capacity or if considered as a new facility then the proposal would provide over 10megawatts of new capacity. When framed in this context the proposal would be a [Development of National Significance] scheme. You may wish to take legal advice on this point."

2.20 The Applicant 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.

2.21 SUP has since confirmed that it would not follow a 'do nothing' approach given the extent of investment in Uskmouth Power Station made to date. If the proposed development does not proceed, Uskmouth Power Station would re-energise and operate the existing power station at 393 MW on 50% coal and 50% biomass under its current permit with the aim to achieve the necessary emissions limits beyond 2027. This could be achieved without additional consent being required and utilising permitted development rights available for electricity generating stations.

2.22 The above future baseline has been used within the EIA accompanying this planning application. In accordance with the requirements of the EIA Regulations, the 'conversion project' as a whole is assessed, including the proposed operational development, which is the subject of the current application for planning permission.

Development Requiring Planning Permission

2.23 Planning permission is sought only for the operational development set out below. However, reference is made within this Planning Statement to the findings of the EIA set out within the Environmental Statement which considers the development as part of the full Uskmouth Conversion Project. The development to which this planning application relates is:

- Construction of fuel storage silos, day silos and conveyor systems;
- Fuel de-dusting building;
- Upgrade to existing rail fuel unloading facilities; and
- Vessels and infrastructure for the delivery and storage of flue gas treatment (FGT) reagents and transportation of residues.

2.24 The dominant use of the Uskmouth Power Station site will remain that of an electricity generating station, the primary fuel source for which will be delivered via rail replicating previous operation of the site using coal as the primary fuel source. Consequently, and as set out by the LPA within the Screening Opinion and pre-application advice, a change of fuel does not constitute a material change of use.

2.25 Section 55(2)(a) of the Town and Country Planning Act 1990 (as amended) ('the Act') excludes the following from the definition of development' for the purposes of the Act:

"… the carrying out for the maintenance, improvement or other alteration of any building of works which—

(i) affect only the interior of the building, or

(ii) do not materially affect the external appearance of the building,"

2.26 Consequently, the works internal to Uskmouth Power Station to enable it to combust an alternative fuel do not require planning permission. It is only the operational development external to the power station that is 'development' requiring planning permission under Section 57 of the Act and which is being applied for.

3 PLANNING POLICY CONTEXT

3.1 The main legislation and planning policies applicable to the proposed operational development are contained within the accompanying DAS and not repeated here wherever possible. Wider planning policy objectives and principles that the Uskmouth Conversion Project (that the proposed development facilitates) supports or contributes to positively are summarised below.

3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions under the Act to be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan in this case is the Newport Local Development Plan, adopted January 2015. Other policies of relevance to the proposals are contained within national planning policy set out in Planning Policy Wales (Edition 10, December 2018) and a series of accompanying Technical Advice Notes (TANs).

National Legislation and Policy

3.3 Planning policy and decision-making in Wales is entwined with the Well Being and Future Generations Act ('WBFGA 2015') that places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of their decision-making processes.

Well Being and Future Generations Act 2015

3.4 The goals of the WBFGA 2015 are set out as follows:

*"**A Prosperous Wales***
An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

A Resilient Wales
A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).

A Healthier Wales
A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

A More Equal Wales
A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

A Wales of Cohesive Communities
Attractive, viable, safe and well-connected communities.

A Wales of Vibrant Culture and Thriving Welsh Language
A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

A Globally Responsive Wales
A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being."

Planning Policy Wales, Edition 10, December 2018

3.5 Planning Policy Wales, Edition 10, December 2019 ('PPW') states its primary objective is to ensure that the planning system contributes to the delivery of sustainable development and

improves the social, economic, environmental and cultural wellbeing of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.

3.6 PPW paragraph 3.7 – Environmental Sustainability – states developments should seek to maximise energy efficiency, the efficient use of other resources, maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.

3.7 PPW paragraph 3.57 – Supporting Infrastructure – states adequate and efficient infrastructure, including electricity, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working.

3.8 PPW paragraph 3.59 states development should be located so that it can be well serviced by existing or planned infrastructure. In general, this will involve maximising the use of existing infrastructure. Infrastructure choices should support decarbonisation, socially and economically connected places and the sustainable use of natural resources.

3.9 PPW paragraph 5.4.1 states, for planning purposes, the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

3.10 PPW paragraph 5.4.2 states economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy.

3.11 PPW Figure 10 illustrates the 'Waste Hierarchy'. It illustrates that 'Disposal', or the depositing of waste in landfill or incineration without energy recovery, as the least preferred method of dealing with waste.

Technical Advice Note 15: Development and Flood Risk, July 2004

3.12 Technical Advice Note 15: Development and Flood Risk (TAN 15) provides advice on matters including the use of Development Advice Maps (DAM) to trigger the need for a detailed Flood Consequence Assessment (FCA). TAN 15 also describes how flood risk issues are determined, how to assess the flooding consequences of proposed development and what action can be taken through development plans and development control (management) procedures, to mitigate flood risk when planning for new development.

3.13 TAN 15 assigns one of three flood risk vulnerability classifications to developments. These are emergency services, highly vulnerable development and less vulnerable development. Highly vulnerable development includes all residential properties and a select list of industrial development (including power stations) and waste disposal sites, with less vulnerable development comprising of all other types of development. Most of the proposed development (i.e. material handling conveyors, silos and ancillary development) is classified as less vulnerable development.

3.14 The Welsh Government's Development Advice Map (DAM) shows that the site falls within Zones B and C1.

3.15 Zone B identifies areas which have sedimentary deposits that indicate evidence of previous flooding. TAN 15 states that as part of a precautionary approach, development within this zone should be checked against the extreme (0.1% AEP) flood level to determine whether an FCA is required.

3.16 Zone C1 categorises *"areas of the floodplain which are developed and served by significant flood infrastructure, including flood defences"*. TAN 15 states that development can take place subject to application of justification test, including acceptability of consequences.

3.17 Paragraph 6.1 of TAN 15 explains that because much urban development in Wales has taken place alongside rivers and in the coastal plain it is inevitable, despite the overall aim to avoid flood risk areas, that some existing development will be vulnerable to flooding and fall within zone C. Some flexibility is therefore necessary to enable the risks of flooding to be addressed whilst recognising the negative economic and social consequences if policy were to preclude investment in existing urban areas, and the benefits of reusing previously developed land. TAN 15 also notes that further development in such areas, whilst possibly benefiting from some protection, will not be free from risk and could in some cases exacerbate the consequences of a flood event for existing development and therefore a balanced judgement is required.

3.18 Paragraph 6.2 goes on to advise that new development should be directed away from Zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue.

3.19 It also advises that highly vulnerable development and Emergency Services in Zone C2 should not be permitted and that all other new development should only be permitted within Zones C1 and C2 if determined by the planning authority to be justified in that location. Development, including transport infrastructure, will only be justified if it can be demonstrated that:

1. Its location in Zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement1; or,

2. Its location in Zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; and,

3. It concurs with the aims of PPW and meets the definition of previously developed land; and,

4. The potential consequences of a flooding event for the particular type of development have been considered and found to be acceptable.

3.20 TAN 15, at paragraph 7.2, explains that whether a development should proceed or not will depend upon whether the consequences of flooding of that development can be managed down to a level which is acceptable for the nature/type of development being proposed, including its effects on existing development.

3.21 Where development is justified the assessment can be used to establish whether suitable mitigation measures can be incorporated within the design to ensure that development is as safe as possible and there is:

1. Minimal risk to life;

2. Minimal disruption to people living and working in the area;

3. Minimal potential damage to property;

4. Minimal impact of the proposed development on flood risk generally; and

5. Minimal disruption to natural heritage.

Technical Advice Note 21: Waste, February 2014

3.22 Technical Advice Note 21: Waste, published February 2014 (’TAN 21’) section 2.7.4 states that where wastes cannot be recycled, other waste recovery operations should be encouraged. Waste recovery operations can serve a useful purpose by replacing primary fossil fuel materials (i.e. coal or gas) which would otherwise have been used to fulfil a particular function in the plant or in the wider economy.

3.23 Section 2.7.4 states the Welsh Government considers recovery of energy from mixed municipal waste in high efficiency facilities to be a vital component of the waste management system in Wales and represents the most sustainable outcome for mixed municipal waste.

Technical Advice Note 23: Economic Development

3.24 TAN 23 pargraph 1.1.1 states PPW defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. In determining planning applications LPAs need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

3.25 TAN 23 paragraph 1.1.2 confirms:

- Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;
- An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;
- Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.

3.26 TAN 23 paragraph 1.2.5 states LPAs should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

3.27 TAN 23 paragraph 2.1.1 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.

3.28 In assessing benefits, TAN 23 paragraphs 2.1.4 to 2.1.14 advicates a qualitative criteria-based approach of assessing economic impacts:

- Alternatives: the planning system should steer development to the most sustainable locations;
- Jobs accomodated: how many direct jobs will be based at the site?; and
- Special merit: would the development make any special contributions to policy objectives?

Local Policy

3.29 The Development Plan for the purposes of Section 38(6) of the Planning and compulsory Purchase Act 2004 in this case is the Newport Council Local Development Plan (LDP), adopted January 2015.

Newport Local Development Plan

3.30 The Local Development Plan (LDP) Proposals and Constraints Maps indicate that the site is not allocated for any specific land use. However, it is affected by the following designations:

- 'The Levels' Archaeologically Sensitive Area (Policy CE6);
- Developed Coastal Zone (Policy CE9);
- Urban Boundary (Policy SP5);
- Flood Risk Zone B;
- Flood Risk Zone C1.

3.31 The site also adjoins the following designations:

- Countryside (Policy SP5)
- Special Landscape Area (Policy SP8 [iv and v]);
- Site of Special Scientific Interest: River Usk (Lower Usk);
- Ramsar and Special Protection Area (Severn Estuary);
- Special Area of Conservation (River Usk).
- National Nature Reserve.

3.32 A summary of the LDP objectives and policies considered relevant to the Uskmouth Conversion Project is provided below.

3.33 Objective 2 – Climate Change – seeks to ensure that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change, by incorporating the principles of sustainable design, changes to travel behaviour, managing the risks and consequences of flooding, and improving efficiency in the use of energy, waste and water.

3.34 Policy SP1 – Sustainability – states proposals will be required to make a positive contribution to sustainable development by concentrating in sustainable locations on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to:

1. The efficient use of land;
2. The reuse of previously developed land and empty properties in preference to greenfield sites;
3. Providing integrated transportation systems, as well as encouraging the co-location of housing and other uses, including employment, which together will minimise the overall need to travel, reduce car usage and encourage a modal shift to more sustainable modes of transport;
4. Reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources;
5. The minimisation, re-use and recycling of waste;
6. Minimising the risk of and from flood risk, sea level rise and the impact of climate change;
7. Improving facilities, services and overall social and environmental equality of existing and future communities;
8. Encouraging economic diversification and in particular improving the vitality and viability of the city centre and district centres;
9. Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;
10. Conserving and ensuring the efficient use of resources such as water and minerals.

3.35 Policy SP2 – Health – advises that development proposals should seek to maximise their positive contribution to health and well-being and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.

3.36 Policy SP3 – Flood Risk – states Newport's coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere. Development will only be permitted in flood risk areas in accordance with national guidance. Where appropriate a detailed technical assessment will be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime. Sustainable solutions to manage flood risk should be prioritised.

3.37 Policy SP4 – Water Resources – states development proposals should minimise water consumption, protect water quality during and after construction and result in no net increase in surface water run-off through the sustainable management of water resources by:

1. The use of sustainable drainage systems;

2. The reuse of water and reduction of surface water run-off through high quality designed developments;

3. Careful consideration of the impact upon finite water resources, particularly in terms of increased pressures on abstraction and the impact of climate change;

4. Ensuring development is appropriately located and phased so that there is capacity in the waste water, sewerage and water supply as well as the protection of water quality.

3.38 Policy SP5 – Countryside – states development in the countryside (that is, that area of land lying beyond the settlement boundaries shown on the proposal and inset maps) will only be permitted where the use is appropriate in the countryside, respects the landscape character and biodiversity of the immediate and surrounding area and is appropriate in scale and design.

3.39 Policy GP1 – Climate Change – states development proposals should:

1. Be designed to withstand the predicted changes in the local climate and to reduce the risk of flooding on site and elsewhere by demonstrating where appropriate that the risks and consequences of flooding can be acceptably managed, including avoiding the use of non-permeable hard surfaces;

2. Be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where practicable;

3. Be designed to reuse or recycle existing construction materials present on the site;

4. Meet the relevant breeam or code for sustainable homes level.

3.40 Policy GP5 – Natural Environment – states development will be permitted where, as applicable:

1. The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the uk, welsh and/or newport biodiversity action plans;

2. The proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, european, national, welsh section 42 and local protected habitats and species, and protecting features of importance for ecology;

3. The proposal will not result in an unacceptable impact on water quality;

4. The proposal should not result in the loss or reduction in quality of high quality agricultural land (grades 1, 2 and 3a);

5. There would be no unacceptable impact on landscape quality;

6. The proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;

7. The proposal includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value.

3.41 Policy GP6 – Quality of Design – states good quality design will be sought in all forms of development to create a safe, accessible, attractive and convenient environment. Proposals should consider the following fundamental design principles:

1. Context of the site: all development should be sensitive to the unique qualities of the site and respond positively to the character of the area;

2. Access, permeability and layout: all development should maintain a high level of pedestrian access, connectivity and laid out so as to minimise noise pollution;

3. Preservation and enhancement: where possible development should reflect the character of the locality but avoid the inappropriate replication of neighbouring architectural styles. The designer is encouraged to display creativity and innovation in design;

4. Scale and form of development: new development should appropriately reflect the scale of adjacent townscape. Care should be taken to avoid over-scaled development;

5. Materials and detailing: high quality, durable and preferably renewable materials should be used to complement the site context. Detailing should be incorporated as an integral part of the design at an early stage;

6. Sustainability: new development should be inherently robust, energy and water efficient, flood resilient and adaptable, thereby facilitating the flexible re-use of the building. Where existing buildings are present, imaginative and sensitive solutions should be sought to achieve the re-use of the buildings.

3.42 Policy CE4 – Historic Landscapes, Parks, Gardens and Battlefields – sets out the requitemertns for sites included in the register of landscapes, parks and gardens of special historic interest and identified historic battlefields to be protected, conserved, enhanced and where appropriate, restored. Attention will also be given to their setting.

3.43 Policy CE6 – Archaeology – states development proposals will normally be required to undertake an archaeological impact assessment before the proposal is determined:

1. Where groundworks and/or the installation of services are proposed within the archaeologically sensitive areas of caerleon, the levels, lower machen and the city centre , or;

2. Within other areas of recognised archaeological interest.

3.44 Policy CE9 – Coastal Zone – development which requires a coastal location should be sited within the developed coastal zone. Development will not be permitted in the coastal area or adjoining the tidal river unless:

1. In the undeveloped coastal area such development is required to be on the coast to meet an exceptional need which cannot reasonably be accommodated elsewhere;

2. The area is not itself at risk nor will the proposed development exacerbate risks from erosion, flooding or land instability.

3.45 Policy CE10 – Renewable Energy – states renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations. Small scale micro-generation will be encouraged within the settlement boundary. Large scale proposals may be more appropriately located outside of the defined settlement boundary if no appropriate

brownfield sites exist. The cumulative impacts of renewable energy schemes will be an important consideration.

Other Material Considerations

3.46 The following documents have also been identified as relevant to the consideration of the planning application.

Wales Spatial Plan Update 2008

3.47 The Wales Spatial Plan identifies 'Newport as a 'Key Settlement of National Importance' within the 'South East – Capital Region'. Newport is also identified as falling within the 'City Coastal Zone' sub-region. The vision is to spread prosperity from Newport to the valleys across the region. Paragraph 19.11 states Newport's regeneration will strengthen its strategic role as the economic gateway to Wales and maximise the benefits of its strong connections with the Eastern Valleys. High value developments should be a dominant feature of Cardiff and Newport's projected employment growth with quality of development befitting a regional capital area.

Towards Zero Waste – One Wales: One Planet, June 2010

3.48 The Welsh Government's Towards Zero Waste – One Wales: One Planet, published June 2010, builds upon Directive (1999/31/EC) on the landfill of waste, OJ [1999] L182/1 and Directive (2008/98/EC) on preventing or reducing the adverse impact of waste, OJ [2008] L312/3 and sets out a long term framework for resource efficiency and waste management until 2050. Figure 9 identifies that residual waste is phased out of landfill to high energy efficiency Energy from Waste plants by 2025.

Draft National Development Framework 2020-2040: Consultation Draft

3.49 The Draft National Development Framework 2020-2040: Consultation Draft (Draft NDF) published August 2019 sets out a national spatial vision for development in Wales and will form part of the Development Plan when adopted.

3.50 Draft NDF Policy 28 – Newport – states the Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the city.

3.51 Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. Development in the wider region should be carefully managed to support Newport's growth and to provide a focus for regional planning. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.

3.52 The Draft NDF states the Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. It has significant brownfield development opportunities to provide new housing and employment areas. There are emerging highly skilled employment opportunities in the transport and digital communications sectors which should be catalysts for further economic investments. The Metro will improve the city's public transport system, especially within the city and to surrounding towns. It benefits from established road and rail links with Cardiff, Bristol and London.

3.53 Growth at Newport will help manage the development pressures in Cardiff and provide a strategic focus for the eastern part of the region. Strategic growth should be focussed in and immediately adjoining Newport itself, to support brownfield regeneration.

Welsh Government Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015

3.54 The Welsh Government Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (WG Practice Guidance), September 2015, section 1.4 refers to the definition of renewable energy as:

"… the term used to cover those sources of energy, other than fossil fuels or nuclear fuel, which are continuously and sustainably available in our environment."

3.55 The WG Practice Guidance identifies EfW as falling within the definition of 'renewable energy'.

3.56 The Practice Guidance also defines 'Low carbon' as:

"Low carbon energy options cover a range of energy sources that are not renewable, but can still produce less carbon than use of the conventional electricity grid or gas network, and are therefore considered an important part of decarbonising the energy supply."

4 CONTRIBUTION TO PLANNING POLICY OBJECTIVES

4.1 Having regard to the previous sections, while the principle of the project is not for consideration, the operational development will facilitate a contribution to the planning policy objectives, which are summarised below. The relevant development plan policy considerations in terms of design and access are addressed within the accompanying DAS that should be read in conjunction with this Planning Statement and are not replicated here.

4.2 The proposed development will facilitate the Uskmouth Conversion Project which would contribute positively to the following planning policy objectives:

- Energy security – through the provision of a facility capable of generating sustainable baseload electricity, complementing other intermittent renewable electricity sources and displacing electricity from primary fossil fuels;
- Energy recovery and zero landfill – contribution towards zero landfill through the provision of a facility that creates market demand for fuel derived from non-recycable waste materials, which would otherwise be destined for landfill or other form of disposal through the provision of a facility that generates power by combusting waste derived fuel pellets;
- Sustainability, by engaging the following principles of sustainability in the operational development:
  - Efficient use of land;
  - Reuse of previously developed land;
  - Integrated transport systems and encouraging the co-location of other uses;
  - Use of low carbon energy sources;
  - Minimisation, re-use and recycling of waste;
  - Minimising risk of and from flood, sea level rise and impact of climate change;
  - Improving facilities, services and overall social and environmental equality of existing and future communities;
  - Encouraging economic diversification;
  - Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;
  - Conserving and ensuring the efficient use of resources such as water and minerals.

4.3 These are summarised in more detail below.

Energy Security

4.4 PPW paragraph 3.57 recognises that adequate and efficient infrastructure, including electricity, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. The Uskmouth Conversion 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 from a sustainable source.

4.5 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. The Uskmouth conversion would provide baseload electricity alongside increasing generation from other intermittent renewable sources to ensure that increasing UK electricity demand can be met during a period of transition towards decarbonisation, coupled with increasing electrification and volatility in the absence of large scale electricity storage.

4.6 PPW anticipates up to 70% of Wales electricity demand to be met by renewable sources at 2030 (50% currently, according to Energy Generation in Wales 2018) while the Welsh Government has set a target of a 95% reduction in greenhouse gas emissions by 2050.

4.7 National Grid's Future Energy Scenarios (National Grid, July 2019) anticipates demand for electricity to increase in the future beyond 2018 levels as follows:

Table 1: National Grid Future Energy Scenarios 2019 Summary

Electricity	2018	2050	% increase
Annual demand (TWh)	285	422	48%
Peak demand (GW)	60	82.5	37.5%

4.8 National Grid's Future Energy Scenarios 2019 anticipates the UK's electricity consumption is to increase by up to 48% by 2050, with the decarbonisation of transportation and heating, which are powered by primary fossil fuels to a large extent currently, major drivers. The increase in electricity demand stems from the UK and Welsh Government targets to achieve net zero greenhouse gas emissions by 2050.

4.9 The need for additional capacity should also be put into context in terms of the imminent significant closure of existing electricity capacity in the UK. There are closures amounting to around 3 GW (5%) of capacity anticipated between 2026 and 2028.

4.10 Existing zero carbon renewable electricity installations (such as wind and solar) are also temporary in nature (typically 25 year project life). Existing installed zero carbon renewable capacity will also therefore either be decommissioned or require re-powering before 2050.

4.11 Together, the above indicate the actual gross energy installation requirement between now and 2050 is greater than the percentage increase indicated above.

4.12 It is important to remember that primary fossil fuel (natural gas, in National Grid's Future Energy Scenarios 2019) will continue to play an important part in the UK's generation mix in all scenarios to 2050, including 'net zero' and limiting global warming compared to pre-industrial levels by no more than 2 degrees Celsius. The proposal will support the transition to a lower carbon future by enabling the decarbonisation of transport and heating and the intermittent nature of renewable energy, displacing other fossil fuel generators, such as gas, that are viewed as a key part of the UK's energy mix, even in a 'net zero' by 2050 scenario.

4.13 The energy pellet which will be used for generation at Uskmouth post conversion is engineered and produced to a closely controlled specification which ensures it is suitable for transport, milling and combustion in a similar way to coal. This can be used not only to extend the life of Uskmouth Power Station to generate electricity from a more sustainable fuel but also has the value of proving this concept (technically and economically) meaning there is potential that other existing coal fired power stations can also be repurposed to contribute to baseload energy demand preventing their closure as the UK transitions to a higher proportion of renewably generated electricity.

Energy Recovery and Zero Landfill

4.14 The Uskmouth Conversion's primary purpose is the generation of electricity, displacing coal by converting an existing coal fired power station to combust waste derived fuel pellets. 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.

4.15 The Landfill Directive (1999/31/EC) aims to reduce reliance on landfill as a disposal option within the European Union (EU) and has been supplemented by the Waste Framework Directive (2008/98/EC) more recently, which introduced the principle of the 'Waste Hierarchy' identifying disposal in landfill or incineration without energy recovery as the least preferred method of dealing with residual waste. The Waste Framework Directive has influenced the waste planning polices of the UK and Welsh Governments in subsequent years, which follow the waste hierarchy principle.

4.16 Present day recycling techniques cannot economically recycle all waste materials and as a result there remains a significant quantity of materials sent for disposal. These non-recyclable materials are presently sent to landfill or diverted from landfill to purpose-built EfW facilities or exported. 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.

4.17 The UK is working to minimise where possible non-recyclable waste being sent to landfill. In the event that non-recyclable biodegradable waste stream was diverted to landfill this in turn could generate greenhouse gases carbon dioxide ($CO_{2)}$ and methane (CH_4) during decomposition. Methane provides significantly greater global warming potential than carbon dioxide. The generation of methane from waste decomposition is avoided in preference to the emission of CO_2 resulting from energy recovery during combustion at the converted power station.

4.18 The Uskmouth Conversion benefits from power generation through energy recovery from combustion of waste derived fuel pellets, as opposed from combustion of biomass or continuation of coal (or a mix) that are the alternative futures for existing coal fired power stations. These fuels utilise biomass from forest depletion or coal mining respectively that can have negative environmental effects. Displacing these fuels in the future would avoid habitat destruction and the need for intensive wood harvesting, pellet production and transportation in the case of biomass or mining, preparation and transportation in the case of coal.

4.19 The waste feedstock to be utilised for the production of the fuel pellets will be sourced solely in the UK. Whereas 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. By making use of presently non-recyclable UK 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.

4.20 A key source for waste derived fuel pellets is:

- Waste rejected from recycling facilities,
- Waste rejected from traditional energy from waste (EfW) plants, that commonly utilise large volumes of waste with lower calorific value 7 to 12 MJ/kg . EfW plants are not adapted to incinerate large volumes of high calorific value (Net CV 22MJ/kg) waste used as feedstock to produce the fuel pellets.

4.21 The converted power station is expected to consume approximately 900,000 tonnes of waste derived fuel pellets annually.

4.22 Approximately 1,300,000 tonnes of waste is dried and processed during the pellet production process to produce the 900,000 tonnes that the Uskmouth power station will consume each year.

4.23 In summary, the planning application proposes operational development only and not a change of use or waste application as (in planning terms) the dominant use of the site will remain the thermal combustion to generate electricity. The project will enable energy recovery and assist in diverting waste from landfill or other disposal and is aligned with Wales' ambition for moving towards 'Zero Waste', moving waste up the hierarchy and minimising disposal in landfill and phasing out of landfill to high energy efficiency Energy from Waste plants by 2025.

Sustainability

4.24 Policy SP1 states proposals will be required to make a positive contribution to sustainable development by concentrating in sustainable locations on brownfield land within the settlement boundary. The application site is an existing brownfield site within the settlement boundary of Newport, identified as a 'Growth Area' within the emerging Draft NDF. The proposal therefore complies with the principle of Policy SP1.

4.25 Regarding Policy SP1 criteria 1 to 10, the proposal's contribution to each criterion is summarised below.

The efficient use of land

4.26 The proposal makes efficient use of land by being located on an existing power station site, which is previously developed (or 'brownfield') land and minimising the amount of new development and 'land take' required.

The reuse of previously developed land

4.27 The proposal utilises underused brownfield land and structures and will regenerate an existing power station site while at the same time facilitating an innovative form of thermal combustion to generate electricity.

4.28 The conversion of an existing developed site and use of existing infrastrcture ensures reduced emissions and disruption relative to a 'new build' project.

Integrated transportation systems and encouraging the co-location of other uses

4.29 The site benefits from an existing integrated transportation system that will be reused and extended. Fuel pellets are transported by rail to the site and deposited into an existing rail unloading facility. The fuel is then transported around the site by mechanical conveyors. This integrated transport system minimises the requirement for transportation of the fuel by less sustainable modes of transport.

4.30 Regarding encouragement of co-location of other users, opportunities for the sale of electricity generated directly (via Power Purchase Agreements, or 'PPAs') to local industry will be explored. Uskmouth Power Station already benefits from proximity to other complementary high energy users, such as steel manufacturing and digital infrastructure providers. The project is able to offer an opportunity for these local businesses to purchase lower cost and more sustainable power from the site, providing Newport with a competitive advantage in terms of attracting such uses to the area.

Reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources

4.31 Only operational development is proposed as part of this planning application, however, this will facilitiate the conversion of an existing coal fired power station to combust a waste derived fuel pellet, which contains approximately 50% carbon neutral biogenic material. 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 in a similar way to coal. This facilitates the efficient extension of the life of an existing coal fired power station, rather than requiring a new purpose built power station to supply energy.

4.32 Uskmouth conversion meet's the Welsh Government's definition of renewable and low carbon energy will potentially displace electricity produced by primary fossil fuels as part of the UK's future energy mix.

4.33 The Uskmouth conversion will use pellets which are produced from waste that cannot be technically or economically recycled. This 'residual' waste would ordinarily be sent for disposal at landfill or waste incineration (with or without energy recovery). However, by processing the waste into a homogenous pellet with high calorific value, a new fuel product is created that will directly displace coal in the existing Uskmouth power station.

4.34 Chapter 13 of the ES 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 as stated earlier and within Chapter 3 ES would be operation of all three generator units at Uskmouth Power Station firing a mixture of coal and biomass fuel. Compared to this future baseline, the proposed development (operation of two power station generator units firing fuel pellets) is predicted to reduce GHG emissions in total and per unit of electricity generated with a consequential beneficial effect in terms of carbon.

The minimisation, re-use and recycling of waste

4.35 While only operational development is proposed as part of this planning application, the Uskmouth Conversion Project will facilitiate the conversion of a coal fired power station to combust an waste-derived fuel pellet, which contains approximately 50% biogenic waste.

4.36 Opportunities for the recycling and reuse of ash produced by the combustion process will be explored.

Minimising the risk of and from flood risk, sea level rise and the impact of climate change

4.37 A Flood Consequences Assessment (FCA) has been prepared in support of the planning application. A topographical survey indicates that the development area slopes from north to south, with levels within the Power Station recorded as approximately 8.6 mAOD. Elevations within the coal stock yard to the south are recorded as approximately 7.4 mAOD.

4.38 The closest designated Main River is the tidally dominated River Usk, which lies immediately to the north and west. The Newport Velocity Depth Mapping – Update identifies the main flood risk posed to the proposed development originating from the tidally dominated River Usk and Severn Estuary.

4.39 A site survey undertaken by RPS in December 2019 identified that surface water runoff from the coal stock yard flows under gravity to a perimeter drain which encircles the southern boundary of the coal stock yard.

Fluvial and Tidal Flooding

4.40 Natural Resources Wales (NRW) notes that the tidally dominated River Usk is the main source of flooding within the study area.

4.41 The NRW Flood Risk Map indicates that the majority of the development area is at 'medium ' risk of flooding (Flood Zone 2). A small section of the former coal stockyard is at 'low' risk of flooding (Flood Zone 1). Some areas benefit from local flood defence infrastructure.

4.42 The development area is defined as Zone B and C1 by the Welsh Government in the Development Advice Maps (DAMs) that accompany TAN 15 meaning that it is at flood risk from events equal to or greater than 0.1% flood risk, but served by significant infrastructure, including flood defences.

4.43 As discussed in the FCA, modelled tidal levels have been extracted from the Newport Velocity Depth Mapping (2016). The data has been used to generate tidal flood levels including future climate change.

4.44 A comparison between topographical survey data against model point data extracted from the Newport Velocity Depth Mapping (2016) study for the 1 in 200 year 2090 defended event scenario indicates that the existing power station assets may be impacted by tidal flooding to a depth of 0.92 m. The ash treatment facility, biomass storage shed, store and associated infrastructure may be impacted by flooding to a depth of 0.27 m. The southern area of the development associated with the silos and conveyors is at risk of flooding to a depth of 1.41 m during the defended 1 in 200 year 2090 event.

4.45 Uskmouth Power Station falls within the definition of 'highly vulnerable' and suitable for the present Flood Zones including climate change, subject to the application of a justification test. A justification test has been undertaken within the FCA, the power station is existing and there are no other reasonably available alternative sites suitable for the proposed development.

Climate Change

4.46 40% has been added to all attenuation/runoff calculations for the proposed development to account for climate change.

Flood Risk Mitigation

4.47 The proposed silos will be raised approximately 3 m above the existing ground level and will therefore be raised above the anticipated level of flooding. In addition, proposed conveyors will also be raised above surrounding ground levels. The proposed rail unloading facilities are required to be flush with surrounding ground levels. Therefore, these are constructed using flood resilient and flood resistant construction techniques where available.

4.48 It is recommended that Uskmouth Power Station is registered with the NRW's flood warning service (if not already) which will allow site management to receive automatic alerts in the event flood warning / severe flood warnings are issued. In addition, it is recommended that a Flood Warning and Evacuation Plan (FWEP) is prepared to set out the procedures that site management and site staff should follow in the event a flood warning is issued. Based on the tidal nature of flooding it is anticipated that sufficient warning time would be available to safely evacuate from the site and ensure conveyor systems are emptied of fuel pellets and avoiding rail deliveries during predicted flood events. However, where insufficient time is available to evacuate from the site, safe refuge should be provided.

4.49 Based on the tidal nature of flooding, there is no requirement to provide floodplain compensation within the site.

Improving facilities, services and overall social and environmental equality of existing and future communities

4.50 The proposed operational development will improve an existing power station to generate electricity from a renewable fuel source and facilitiate the reduction of waste disposal (to landfill or incineration) and contribute to environmental quality for existing and future generations.

Encouraging economic diversification

4.51 While only operational development is proposed as part of this planning application, the Uskmouth Conversion Project will facilitiate economic diversification in Newport, which is an identified 'Growth Area' for Wales. In particular, the Uskmouth Conversion has the potential to provide opportunity of local large scale electricity users to purchase lower cost renewable power from Uskmouth, including steelworks and the emerging digital infrastructure industry (data centres etc.). In addition, commercial opportunities for co-location on or near the site with complementary users of electricity and/or carbon, such as the pharmaceutical and/or food and beverage industry, will be fully explored.

4.52 When considered in terms of cost per calorific unit of energy, the waste derived fuel pellets are extremely competitive in comparison to biomass or coal fuels. This competitive pricing would significantly reduce the long run marginal cost of electricity generation, allowing Uskmouth to supply power at lower cost than other generators. It is intended to sell some of the electricity produced to local large scale power users locally. Competitive local sustainable power pricing provides an opportunity to bolster the local economy providing Newport with a significant competitive advantage in attracting digital infrastructure and other high electrical energy users, an area of the economy identified for significant growth.

4.53 The waste to be utilised for the production of the fuel pellets used by the Uskmouth Power Station Conversion Project will be sourced solely in the UK and facilitate several pellet production facilities being built in the UK with associated economic and social benefits in terms of investment and jobs. In contrast, a significant proportion of conventional primary fossil fuel and other renewable biomass fuels utilised for utility scale thermal power generation are now imported internationally.

Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment

4.54 The majority of the southern half of the application site comprises a coal stock yard, which is primarily bare ground but is bounded by neutral grassland and supports a diversity of wildflowers. A ditch on the southern boundary adjoins the Newport Wetlands SSSI and an operational reservoir is located within the application site.

4.55 The existing habitats within and adjacent to the development site have value for the following protected species:

- Roosting bats – the site includes common and soprano pipistrelle day roosts in the flyover bridge (outside of the development area) with further day roosts of pipistrelle and a brown long eared bat in bat boxes installed on trees in the wider power station site.
- Foraging bats – the development site provides foraging habitat (in particular the reservoir and managed grassland as well as scrub and woodland on the boundary and outside the application site).
- Otter – there were no signs of otter activity within or adjoining the development site, but there is a local otter population using the River Usk and Severn Estuary with a frequently used otter path of the northern boundary of the power station.
- Water vole – the presence of water vole was confirmed in a section of the boundary ditch on the southern boundary of the coal stock yard.
- Badger – a single hole outlier sett is located in the managed grassland between the main power station and coal stock yard with a further outlier site located in scrub over 30m to the east of the development.
- Breeding birds – the assemblage of breeding birds is associate with scrub habiats (primarily outside but adjacent to the southern half of the application site) and the margins of the reservoir. Addtional species including peregrine are associated with the main power station buildings.
- Wintering birds – very small numbers of SPA qualifying species were recorded on the reservoir during the monthly counts. Wintering bird activity in the wider area is associated with the Newport Wetlands and sections of intertidal habitat on the margin of the River Usk.
- Reptiles – grass snake were recorded in grassland habitat adjoining the coal stock yard and the reservoir.

- Invertebrates – the majority of the development site has low value for invertebrates, but higher value areas include the southern boundary of the coal stock yard and fringes of the reservoir.

4.56 The development site adjoins the Newport Wetlands SSSI, NNR and RSPB Reserve to the south.

4.57 The wider Uskmouth power station site adjoins the River Usk SAC/SSSI to the north with the Severn Estuary SPA/SAC/SSSI located to the west of the power station. Julian's Gout Land SINC is located within the power station landholding east of the development site.

4.58 The location of the proposed development within an existing operational site will minimise the impacts on habitats as the works are focussed upon the coal stock yard and existing infrastructure. The habitats with highest biodiversity value in the context of the site will be retained and protected with stand-offs; the boundary ditch, reservoir, and neutral grassland.

4.59 The managed grassland will be subject to temporary disturbance and subject to post-development restoration. The mature trees in this area will be fully protected. The existing surface water management system will be fully operational providing protection from surface water run off, and in the event of a pollution incident.

4.60 Protection measures for breeding birds, reptiles, badgers, and water will be incorporated into the construction working area and programme, and with works covered by species mitigation licences where required.

4.61 New grassland habitat will be created on areas of bare ground, and these will be designed for wildflower diversity and to have value for the assemblage of invertebrates present in the wider power station landholding. The boundary ditch will be managed to enhance its value for water vole and invertebrates.

4.62 Dark corridors will be maintained along the scrub on the southern boundary and retain the value of the reservoir for foraging bats and ensure lighting does not create a barrier for wildlife

4.63 Long-term management regime for biodiversity benefits will be delivered alongside the development to actively promote and monitor establishment and maturation to deliver biodiversity enhancement.

4.64 A detailed management schedule for invasive non-native plants will be prepared and implemented for the wider landholding with regular monitoring to review the success of treatment and control.

4.65 All impacts on nature conservation designations and habitats during construction and operation are negligible, including for bats, wintering birds, breeding birds, water vole and otter. For habitats and some species the predicted effect is beneficial as new habitats become established and increase the extent the ecological resources that are actively managed for wildlife within development and wider power station.

Conserving and ensuring the efficient use of resources such as water and minerals.

4.66 The proposal is unlikely to have any significant new impacts on water resources and there are no known mineral designations affecting the site.

5 SUMMARY AND CONCLUSION

5.1 In summary, this Planning Statement supports a planning application for operational development comprising erection of silos, conveyors, de dusting plant, extension to rail unloading shed and ancillary development (the Proposed Development), which is part of the Uskmouth Conversion Project, at Uskmouth Power Station.

5.2 This Planning Statement should be read in conjunction with the DAS. As operational development only is proposed within the planning application, the primary planning considerations relate to design and access within the context of an existing industrial power station site. An assessment of the proposal and compliance with the development plan and other planning policies in these regards is contained within the DAS and not replicated here. Instead, as requested within the LPA's EIA Scoping Opinion dated 13 February 2019, this Planning Statement focusses on procedural matters raised and the key planning policy objectives and sustainability benefits the proposed operational development will facilitate.

5.3 This document confirms, having taken legal advice, that:

1. Uskmouth Conversion is not a DNS;

2. Uskmouth Conversion is not a NSIP;

3. A non-operational basis is not the correct approach for determining future baseline for the purposes of EIA. Rather it must be what is likely to be the case if the project 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.

5.4 SUP has confirmed that it would not follow a 'do nothing' approach given the extent of investment made at Uskmouth Power Station. If the proposed development does not proceed it would operate the existing power station at 393 MW (gross) on 50% coal and 50% biomass under its current permit with a view to achieving the necessary emissions limits beyond 2025. This could be achieved without additional consent being required and utilising permitted development rights available for electricity generating stations.

5.5 The above future baseline has been used within the EIA accompanying this planning application, the Regulations of which requires the entire 'project' as a whole to be assessed, including the proposed operational development requiring planning permission.

5.6 This Planning Statement has considered the planning policy objectives the proposed development will facilitate, complement and contribute positively to, including:

- Energy security – through the provision of renewable baseload electricity, potentially displacing primary fossil fuels;

- Energy recovery and zero landfill – through combusting a fuel pellet to generate electricity rerived from non-recylable waste and moving away from disposal;

- Sustainability, including:

  – Efficient use of land

  – Reuse of previously developed land

  – Integrated transport systems and encouraging the co-location of other uses

  – Use of low carbon energy sources

  – Minimisation, re-use and recycling of waste

- Minimising risk of and from flood, sea level rise and impact of climate change
- Improving facilities, services and overall social and environmental equality of existing and future communities;
- Encouraging economic diversification;
- Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;
- Conserving and ensuring the efficient use of resources such as water and minerals.

5.7 In conclusion, the accompanying DAS considers that the proposed operational development is appropriate to its context and in accordance with relevant design and access policies within the development plan concerning the erection of ancillary structures on an existing industrial power station site. Furthermore, relevant material considerations, including regeneration of an existing brownfield power station site, investment, jobs and potential wider benefits for complementary uses and electricity users in a growing Newport also indicate planning permission should be granted. The wider Uskmouth Conversion Project, which the proposed development will facilitate, is considered complementary to planning policy objectives in terms of energy, waste and sustainability. Planning permission should be granted accordingly.