



Ref: C025-01

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

4<sup>th</sup> September 2020

BY E-MAIL

Dear Sirs

**STATUTORY PRE-APPLICATION CONSULTATION – DEVELOPMENT OF NATIONAL SIGNIFICANCE  
(PROCEDURE) (WALES) ORDER 2016**

**PROPOSED CONSTRUCTION AND OPERATION OF AN ENERGY RECOVERY FACILITY, INCLUDING THE  
FORMATION OF A NEW ACCESS ON TO NEWLANDS ROAD AND ANCILLARY INFRASTRUCTURE**

Please accept this letter as Môr Hafren Bio Power's formal response to your letter dated 13<sup>th</sup> August 2020 that was sent in response to our pre-application statutory consultation.

We note that NRW raises significant concerns and recommends to the determining authority that four specific requirements should be met before permission is granted for the above referenced development. We note that a number of planning conditions are also proposed.

For your ease of reference, we address each requirement in turn and then address the proposed planning conditions and the other comments in your response.

Prior to doing so, by way of context, we reiterate that this site previously had planning permission for a waste management use with a similar capacity and the site is allocated for future development.

**REQUIREMENT 1: DESIGNATED SITES – A REVISED AIR QUALITY ASSESSMENT**

We note that you are currently carrying out a high-level review of our air quality modelling and at the time of writing we have not received any further comments.

Notwithstanding the above, we have looked in detail at your comments on the impact of aerial emissions on ecological receptors and critical loads, traffic emissions and significance thresholds and in-combination assessment.

For your ease of reference, our air quality consultants, Environmental Visage, have prepared a short Report that addresses your comments, updates the assessments where necessary and provides additional justification for our approach on certain matters. The Report is attached as Appendix A to this letter.

### ***Ecological Receptors and Critical Loads***

In summary, we can confirm that the Severn Estuary SAC has been assessed in the Air Quality Assessment (AQA). Appendix A includes the mapping showing the SAC and Ramsar boundaries and confirms that the receptors named Severn Estuary Ramsar Site 1 and Site 2 are representative of both.

Our ecological consultant, Bradley Murphy Design (BMD), advised on the critical load for nitrogen and you will see his advice in Technical Appendix 10 Appendix 1.2, available as part of our Proposed Application. The critical load has been taken directly from the Air Pollution Information System (APIS) on the basis of the description of the Gwent Levels – Rumney and Peterstone SSSI in the citation.

Appendix A provides an addendum to the Proposed Application AQA (Technical Appendix 6) addressing the cumulative assessment at ecological receptors. The AQA and Environmental Statement have been updated accordingly in the formal submission. As confirmed in the detailed AQA, there is no significant difference between the model predictions for the combined emissions scenario at the location of the maximum Process Contribution across the 4km x 4km modelled grid.

The cumulative levels of nutrient Nitrogen deposition are less than 1 % at each of the discrete receptors with the exception of E4 (a location within the Gwent Levels) and E24, representing the Wentloog Industrial Park SINC. The impact at most receptors is therefore screened as insignificant. At location E4 within the Gwent levels, the resultant total deposition, considering both the cumulative effects of the Môr Hafren and Trident Park facilities and the existing background nutrient Nitrogen levels, equates to 71 % of the lower Critical Load for nutrient Nitrogen deposition.

Exceedance of a Critical Load is not a quantitative estimate of damage to a particular habitat, but is instead "*a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge.*" As such, and with the total calculated levels of nutrient Nitrogen at both sites where the process contributions cannot immediately be screened as insignificant remaining within the Critical Loads, it is considered that the potential for the development of the Môr Hafren facility to have a significant negative impact on either site is limited.

### ***Traffic Emissions***

In respect of traffic emissions, we have reviewed the impacts at two modelled locations, Receptors 10 and 11. and it is the case that the existing background at Receptor Location 11 has reduced from that originally reported.

Taking account of the fact that the Process Contribution from the traffic impacts is less than 2 %, and considering the IAQM's impact descriptor table, reproduced In Appendix A for ease, further consideration of the increase in

traffic NO<sub>x</sub> at the Gwent Levels would determine the potential impact to be negligible, and therefore should not require additional detailed assessment.

Technical Appendix 7 Air Quality and Traffic and the Environmental Statement have been amended accordingly.

## **REQUIREMENT 2: DESIGNATED SITES – A REVISED SITE LAYOUT PLAN DETAILING RELEVANT INFRASTRUCTURE**

We have fully considered your comments on buffer zones, fuel storage, urea unloading areas and infrastructure.

There is an existing ditch to the west of the proposed development area. As stated in our application that ditch will be retained, managed and maintained throughout the life of the development. Details are set out under Requirement 3.

As it is a ditch, the requisite buffer zone is a minimum of 7m from the top of the bank.

We have prepared a new Drawing that shows various buffer zones and distances from the ditch. This is referenced Drawing PL103 – Boundary Zones and Buffers. This is attached as Appendix B. The Drawing shows the buffer zone from the top of the ditch bank and the distances across the site to:

- The Residue Silos – 78.13m
- The Lime Silo – 86.71m
- The Fuel Oil Tank – 96.8m
- The Urea Unloading Point – 99.54m

The Drawing also marks out the width of the access road adjacent to the buffer zone, which is 5.05m.

We have moved perimeter security fence to the edge of site perimeter footpath. This provides sufficient space adjacent to the southern access point to access the ditch area to carry out maintenance.

A revised Site Layout Plan is attached as Appendix C to this letter, Drawing PL101, Revision A. The new position of the perimeter fence is shown and the annotation previously referred to as 'Pump House' has been amended to reflect its function as a Fire Water Pumping Station. The Drainage Strategy has been amended to relocate the pumping station to an area under the Air-Cooled Condensers. This is discussed under Requirement 4.

Drawings PL102A, PL110A, PL201A and PL312A are revisions to the Proposed Application Drawings reflecting the revised fence line and annotation of the pump house.

For clarity the revised Drainage Strategy is now listed as a Planning Drawing, rather than referencing through to Technical Appendix 15, Flood Consequences and Drainage.

We can confirm, as stated in Section 9 of the ES, and Technical Appendix 9 – Environmental Noise Impact Assessment, that a 2m high acoustic fence will be erected around the site (with the exception of the site entrance and exit) during the construction period. It is intended that the proposed 2.4m high palisade fencing will be erected prior to construction and the acoustic fence will be erected inside. This will form a solid barrier between the construction site and the buffer area to the ditch.

The permanent fencing and gates will also provide the necessary security.

The Planning Statement, Environmental Statement, Non-technical Summary have all been amended to reflect the 'dual' fencing.

We note your comment regarding the need for a condition to ensure that the buffer zone between the development and the watercourse is maintained. Môr Hafren Bio Power confirm that they are happy to abide by such a condition that references Drawing PL103 as showing an appropriate buffer zone between the ditch and major infrastructure

### **REQUIREMENT 3: DESIGNATED SITES – WATERCOURSE MANAGEMENT PLAN**

We have reviewed your comments on the current condition of the ditch and your requirement for a Watercourse Management Plan.

As mentioned above, Môr Hafren Bio Power are committed to managing and maintaining the ditch for life of the development. The provision of a Watercourse Management Plan is agreed as a means of ensuring the watercourse/ditch is appropriately managed and enhanced.

We set out below our proposed Plan and would be content for this to be the subject of a planning condition that would sit alongside the requirement for an Ecological Monitoring and Contingency Plan.

For ease of reference, Proposed Application Technical Appendix 15, Flood Consequences & Drainage included the operational drainage strategy (Section 6). The proposed drainage strategy is shown on Drawing 7000, revision P01. The indicative offsite foul rising main route is shown on Drawing 7001, Revision P00.

As mentioned above, the drainage strategy has been revised to re-position the foul water pumping station to a more appropriate location towards the southern part of the site. This change is shown on Drawing 7000, revision P02, which is attached to this letter as Appendix D. The foul drainage route has been adjusted to suit the revised site layout plan. This change is shown on Drawing 7001, P01, which is attached as Appendix E to this letter.

#### ***Ecological Surveys***

***Reference is made to aquatic invertebrate surveys being carried out outside the main activity period and not be a qualified entomologist.***

The Proposed Application was accompanied by a suite of documents relating to ecological designations and surveys:

- Chapter 10 Proposed Application Environmental Statement
- Technical Appendix 1.1 REC Preliminary Ecological Appraisal
- Technical Appendix 1.2 BMD Air Quality and Noise
- Technical Appendix 1.3 BMD Verification Report
- Technical Appendix 1.4 ADAS eDNA Sampling Report
- Technical Appendix 1.5 ADAS Reptile Survey Report
- Technical Appendix 1.6 ADAS Botanical Survey

The Preliminary Ecological Appraisal (PEA) was carried out by REC. This ecological assessment work was subsequently taken over by Bradley Murphy Design (BMD). BMD reviewed the PEA and prepared the BMD Verification Report (Technical Appendix 1.3). The Verification Report set out the requirement for additional survey work including botanical survey and invertebrate assessment.

Technical Appendix 1.6 confirms that a field survey was carried out by a suitably qualified ecologist on 14<sup>th</sup> May 2020, suitably timed within the ecological calendar.

The ditch is referred to in paragraph 3.1.4, where it states it was 3-4-metre-wide and at the time of the survey was 10-20 cm deep, though it appears that water levels are variable throughout the year. It was shaded by trees and had an accumulation of leaves from the overhanging branches. There was very little aquatic vegetation but there was occasional Common Duckweed (*Lemna minor*). The banks were mostly bare but Hemlock Water Dropwort was present on a small section of bank. Greater Pond Sedge (*Carex riparia*) and Common Reed were present at the northern end

Section 5 of the Report sets out the Invertebrate Assessment and confirms that the ditch lacked dense vegetation and appeared unlikely to provide a habitat for notable invertebrate populations. The two species of water beetle referenced in the PEA are both associated with patches of dense vegetation.

It is proposed that the ditch is retained and protected. Accordingly, no further invertebrate surveys should be required. NRW agree with this position, subject to the provision of information relating to future management and maintenance.

### **Watercourse Management Plan**

Môr Hafren Bio Power will manage and maintain the ditch for the lifetime of the development in accordance with a Watercourse Management Plan that includes the following principles. It is agreed that the management and maintenance obligations can be secured through the imposition of an appropriate planning condition that would also secure an Ecological Monitoring and Contingency Plan.

### ***Watercourse Management Plan Objectives & Principles***

The objective of the Watercourse Management Plan is to carry out management and maintenance activities sympathetically and as planned operations. Such operations will have no detrimental effect on wildlife or species using the waterbody. Regular maintenance will ensure silt levels are controlled enhancing the ditch ecologically and ensure optional oxygen levels in the water.

The Plan will follow the 3 M's:

- Management
- Maintenance
- Monitoring

### ***Management***

Once all of the necessary planning conditions are discharged, a programme of ditch management will commence.

1. The 2.4m high palisade and 2m high acoustic fencing will be erected in advance of any works to ensure there is a fixed barrier between the construction site and the ditch.
2. A 7m buffer zone is retained between key infrastructure on the site. Sufficient space remains for access for ditch for management and maintenance purposes. This is shown on Drawing PL103 Boundary Zones and Buffers.

3. The ditch will be reshaped through a programme of casting. The casting, or desilting process, will be carried by a combination of mechanical and manual means. These works will be undertaken out of season during October/November. The silt will be deposited along the bank edge for an agreed period. Thereafter it will be tidied to a specified area or removed off site.

#### *Maintenance*

1. Prior to the initial casting works a programme of vegetation removal will take place to ensure the ditch is accessible.
2. Upon completion of the initial casting, a programme of maintenance will be followed that ensures the features of the watercourse are protected and enhanced.
3. These works will be overseen by a suitably qualified person.
4. A programme of general maintenance will be carried out at appropriate intervals to ensure that vegetation is removed from the watercourse and that surrounding vegetation is maintained.

#### *Monitoring*

1. Prior to any works commencing, initial siltation monitoring shall be carried out in accordance with the requirements of an Ecological Monitoring and Contingency Plan (to be agreed by condition). The existing condition of the ditch and the degree of siltation will be recorded.
2. Once the initial casting has taking place further siltation monitoring shall take place and the condition of the ditch will be recorded.
3. Siltation monitoring will take place on an annual basis over a period of 7 years. This will determine the extent to which further casting will be required in accordance with parameters to be set out in the Ecological Monitoring and Contingency Plan.
4. The Ecological Monitoring and Contingency Plan will make provision for:
  - Monitoring silt levels;
  - Water quality monitoring;
  - In channel vegetation levels.

The monitoring will take place in accordance with agreed parameters to be determined.

5. At the end of the 7-year period, a further programme of management, maintenance and monitoring will be agreed with the LPA/NRW.

#### **REQUIREMENT 4: DESIGNATED SITES – REVISED DRAINAGE STRATEGY**

We have fully considered the comments raised regarding surface and foul water drainage proposals and respond as follows.

For ease of reference, Proposed Application Technical Appendix 15, Flood Consequences & Drainage includes the operational drainage strategy (Section 6). The proposed drainage strategy is shown on Drawing 7000, revision P01. The indicative offsite foul rising main route is shown on Drawing 7001, Revision S2.

#### ***Surface Water Drainage***

***To avoid damage to the SSSI and to ensure that all drainage requirements can be accommodated satisfactorily within the layout proposed, we require a revised drainage strategy which includes:***

- ***details for both the construction and operational phases of the development***

The construction phase surface water management plan will be developed with the appointed Contractor as part of their Construction and Environmental Management Plan (CEMP). The Applicant accepts the need for a CEMP, and an appropriate planning condition to that effect, and that is referred to in the Proposed Application documentation and in the formal submission.

NRW requires a CEMP to address all relevant environmental issues and that includes details for the appropriate control of surface water and mitigation / management (paragraph at top of NRW letter, page 6). NRW require a condition to be imposed on any planning permission (condition 1). Condition 1 requires the submission of a site wide CEMP to be submitted and approved in writing, prior to any development commencing on site.

The CEMP would be submitted to the Local Planning Authority through a formal discharge of condition application. NRW would be a statutory consultee.

The proposed condition includes the provision for submission of surface water management during construction. The Applicant's other sites have used environmental bunding and silt buster technology to control surface water drainage and to protect the environment during the construction phase of projects. The approach and technology for drainage utilised during the construction period is an entirely normal and commonplace part of agreeing the CEMP.

The Applicant agrees that the CEMP is the most appropriate means of securing surface water management, given that further detailed design will be undertaken post planning permission. NRW will have adequate assurance that controls are in place through the CEMP.

The submitted Technical Appendix 15 included an operational drainage strategy with key items noted and attenuation sizes calculated. Pipe sizes would not normally be set out within a drainage strategy and are instead reserved to the detailed design stage. The operational drainage scheme will follow as part of the scheme development as it may be subject to change depending on ground conditions which may require different routing and sizing as part of the detailed design.

The water quality protection measures during operation have been assessed during operation and this is summarised in Table 6.6 in Technical Appendix 15.

- ***details of the collection and disposal of surface water, including how roof water is to be separated from surface water.***

The operational drainage plan, revised as referenced above, shows that separate networks will be provided for roof water and surface water, prior to attenuation to enable suitable treatment/ reuse. The roof water is diverted directly into rainwater storage and the excess follows the standard drainage scheme via attenuation, oil separation and discharge via Hydro-Brake to limit flow rates to that of greenfield equivalent and the use of a penstock valve for pollution control. Further details will be provided during the application for Environmental Permit.

The site drainage has been designed to discharge into the adjacent ditch, with the headwall set back from the main drainage channel to reduce the risk of impeded flows during both construction and operation.

- ***details that demonstrate the watercourse is not to be used as part of the surface water treatment scheme; polluted surface water from the site will not be allowed to discharge directly to the drainage system of the SSSI;***

During the operational phase the attenuation on this site will be provided by the use of a below ground attenuation tank, fed by a subsurface pipe network. Prior to entering the tank all flows from trafficked areas will be passed through a Class 1 Full Retention Separator to provide water quality management, including silts and

oils. Flows from roof areas will be retained for use on site where practicable and excess will enter the tank downstream of the separator to protect the capacity of this device to manage potential contaminated flows. All flows will pass through a Proprietary Treatment System following attenuation prior to discharge to provide additional water quality enhancement. As stated there will be a Hydro-Brake to ensure that runoff rates are equivalent to those of green field.

Section 6.6 of the Flood Consequences & Drainage Report demonstrates that suitable treatment is being provided depending on runoff destination and risk.

Please refer to answer 1 for the control of run off during construction phase.

- ***demonstration that only 'clean' water which has been treated discharges into the drainage system of the SSSI;***

See above response.

- ***details as to where the class 1 interceptor for silts and oils will discharge;***

See above.

As per the design, Class 1 Interceptors do not discharge silts and oils but hold them in a sealed tank for suitable extraction and waste management offsite. It is unclear why the discharge point is being mentioned when such devices generally do not have one.

- ***if any surface water is to be discharged into a watercourse, a water quality monitoring plan relating to both the construction and operational phases of development, to ensure that only clean water is discharged to protect the integrity of the SSSI.***

Regular sampling of the surface water will take place to ensure that drainage strategy continues to afford appropriate protection to the ditch.

In addition, regular sampling will be undertaken of the process effluent which will be pumped to foul sewer by agreement with Welsh Water under a trade effluent permit. During operation the effluent discharge is also covered by an Environmental Permit Issued by NRW. As a similar interceptor system is utilised during construction the developer will happily agree a suitable monitoring programme through the CEMP.

An appropriate programme of monitoring will be developed in conjunction with an ecologist/the local authority/NRW to ensure the appropriate level of sampling, recording, reporting and mitigation. Môr Hafren Bio Power would accept a pre-commencement condition to that effect.

- ***details of the proposed channel (e.g. size, open or closed channel, type, design standards) and the proposed settlement chamber (e.g. type, size, design standards)***

The design of the operational settlement system will be agreed through the issue of an Environmental Permit following determination of the permit application by NRW.

- ***details of areas for the storage of non-hazardous waste. We advise that the entire surface in those areas must consist of impermeable materials, in order to avoid underground water pollution and the provision of enough information to ensure that the whole surface will remain impermeable during the operational phase.***

The management of the construction phase will be detailed within the CEMP under the proposed pre-commencement condition (condition 1). As highlighted above, construction cannot commence until this condition (as well as all other pre-commencement conditions) are discharge to the satisfaction of the regulators.

The operational areas of the site will be paved in impervious materials such as concrete or tarmac depending on their designated use. Regular monitoring of the condition of these surfaces will be undertaken during the operational phase to ensure that these surfaces are intact and remain maintained. The detail and frequency of this monitoring will be defined within the application for an environmental permit and reflected within the permit conditions themselves in due course.

No operational or waste storage will be undertaken outside permitted and appropriately bunded areas within the building and this will be a requirement of the Environmental Permit.

- ***details to ensure no runoff enters watercourses from waste storage areas, even during extreme weather events.***

During the operational phase the storm water drainage system will be designed for a 1 in 100 year +40% Climate change event. The waste storage areas are all within the enclosed and bunded building. Runoff from waste storage areas are designed such that they cannot enter the surface water drainage system or watercourse. Operational procedures will be developed to ensure that the surface water is retained on site through use of the penstock valve in the event of an incident. These Environmental control procedures will be detailed within the permit application.

- ***details of specific measures for the protection of surface water and control measures to be implemented to avoid adverse impacts on the SSSI. This should link with the water quality monitoring programme on site and the need for contingencies for remedial action. (Ecological input should therefore be included in the final design of the site drainage scheme to ensure that adequate protective measures are in place, to avoid pollution of water features.)***

During construction and operational phase Class 1 interceptors and proprietary treatment devices will be used to manage surface water flows. A penstock valve to the discharge point from the site will be used to prevent runoff in an emergency: i.e. fire water runoff, oil spill etc. The design control and operation of these will be managed through the agreement of a CEMP and ultimately an Environmental Permit.

### ***Foul Drainage***

***Foul drainage is to be connected to the mains sewer by way of a pumping station to the nearest foul line. The proposed pumping station needs to be contained within a kerbed/bunded area. Given the station's proximity to the watercourse, an un-kerbed/un-bunded area is likely to result in sewage discharging into the waterways in the event of a sewage overflow within the pumping station compound. Details of a kerbed/bunded area therefore need to be provided.***

For clarity we confirm the following pumps and pumping station are proposed:

1. Fire water pump – This is necessary for additional fire control. This is shown on the site layout plan but not on the Proposed Application Drainage Strategy. The Drainage Strategy has been amended to reflect the updated site layout plan.
2. Internal foul/ effluent pumps – these will be sited internally are generally small, and not overly powerful units to lift flows to the external drainage system.
3. External Main Foul Pumping Station – This is shown on the Drainage Strategy Plan, in a similar location to the fire water pump house. Given the distance that will be required for the rising main to connect to Welsh Water infrastructure an external Pumping Station will be required. External Pumping Stations normally come with a large amount of inbuilt storage and dual pumps to mitigate for failure of power or equipment. However, we can confirm that a bunded/ kerbed will be provided around this feature to provide some additional storage in the unlikely event of a failure. The Applicant is content to accept a condition to that effect.

As referenced above the drainage strategy has been amended to relocate the foul water pumping station to a more appropriate location, near to the Air-Cooled Condensers.

The main external pumping station for foul water will be sited in a suitably bunded/ kerbed area to provide additional storage over and above that provided within the Pumping Station itself. The system will also be provided with a standby and duty pump system to provide extra redundancy in the event of a pump failure. Suitable beacons etc. will be installed to promptly notify the site operations of an issue with the pumping facility.

Further details of the pumping station and its bunding design/operation/compliance with Control of Pollution (Oil storage) regulations 2016 will be provided within the application for Environmental Permit.

***For information, under the New Authorisations for Water Resources, an abstraction licence may be required for the dewatering activity for the installation of the pumping station well. For more information please contact 0300 065 3000 or emailenquiries@naturalresourceswales.gov.uk***

No groundwater or surface water abstraction is envisaged for the process.

#### **Control of Pollution (Oil Storage) (Wales) Regulations 2016**

**Details are required to demonstrate how the development will comply with the above regulations for safe storage in regard to the proposed fuel storage and urea offloading areas.**

The details for the mechanical design of the facility are not yet finalised. These will be addressed during an application for an Environmental Permit to NRW. They will be made available during the detailed mechanical design phase of the project post planning determination.

Oil, urea and other consumables storage areas etc. will be provided with suitable protection to prevent pollution. Procedures to manage loading and offloading, bunds, spill control etc, including, if appropriate, coverings to reduce surface water ingress, doubled bunded tanks with suitable containment to provide required storage levels, oil discriminating pumps. The measures to be implemented will reflect the best available techniques appropriate to the process.

The full details will be provided during the application for an Environmental permit.

#### **PLANNING CONDITIONS**

We have reviewed the proposed planning conditions 1-9 and confirm that Môr Hafren Bio Power are content with the wording proposed as referenced below:

- Condition 1 – Construction Environmental Management Plan – AGREED
- Condition 2 – Biosecurity Risk Assessment – AGREED
- Condition 3 – Acoustic Fence – AGREED
- Condition 4 – Protected Species – PRINCIPLE AGREED BUT SHOULD BE REWORDED TO REFLECT THE SUBMISSION DOCUMENTS:
  - Environmental Statement
  - Planning Statement
  - Technical 10 Appendix 1.1 Preliminary Ecological Appraisal which must be read alongside Technical Appendix 10 Appendix 1.3
  - Technical Appendix 10 Appendix 1.4 eDNA Sampling Report
  - Technical Appendix 10 Appendix 1.5 ADAS Reptile Survey Report
  - Technical Appendix 10 Appendix 1.6 ADAS Botanical Survey

## **FLOOD RISK**

We note your comments to the determining authority on flood risk and your view that there will be no loss of functional floodplain storage as a result of the proposed development and your confirmation that you have no concerns in respect of flood risk matters.

## **ENVIRONMENTAL PERMIT**

We thank you for your further advice on the application for an Environmental Permit which will be necessary to operate the plant. The short Report at Appendix A provides some commentary on plume visibility and the other matters will be taken on board as we prepare a detailed and robust application.

While we respect your preference to twin-track the respective planning and permit application process there is no legal requirement to do so and the timescales for the processes are not necessarily aligned.

You will appreciate that that the proposed energy recovery facility will need to go through a detailed design phase. The detailed specification for each individual component is required is required for the permitting process.

At this stage, we would also wish to signpost our R1 Calculation and WRATE life-cycle assessment which were attached as Appendix 1 and Appendix 2 of our Proposed Application Waste Planning Assessment, June 2020. These demonstrate that the proposed facility will achieve R1 status and will be highly efficient as well as significant carbon savings when compared to landfill.

## **CONCLUSION**

In conclusion, we thank NRW for the comprehensive review of our Proposed Application and believe we have provided the necessary information to satisfy Requirements 1-4 such that your concerns are allayed and you will respond favourably to formal application submission.

We would welcome the opportunity to discuss this response with you as we enter into the formal application process.

Yours sincerely



**Maureen Darrie**  
Director