



Proposed Môr Hafren Energy Recovery Facility (DNS/3236340) – Implications Arising from the Draft National Development Framework

Background

1. This Statement is prepared on behalf of Môr Hafren Bio Power in connection with the application for the proposed Môr Hafren Energy Recovery Facility which was submitted to the Planning Inspectorate on 4th September 2020. The ERF is proposed to be sited on land off Newlands Raod, Cardiff, a site which had a previous planning permission for a similar scale waste management use.
2. The relevant planning policy appraisals are found in the planning application, mainly in the accompanying Planning Statement (DOC 9), Waste Planning Assessment (DOC 10) and the Environmental Statement (DOC 34).
3. The Welsh Government published its draft National Development Framework (NDF) for consultation on 7th August 2019. The proposed changes to the NDF (Future Wales: The National Plan 2040) were laid before the Senedd on Monday 21 September 2020.
4. The document will be before the Senedd for 90 days and should be published/adopted in February 2021.
5. In broad terms it is considered that the proposed ERF has a positive role to play in the Welsh Government's aspirations for Future Wales.

The Role of the National Development Framework

6. The NDF is stated as providing a 'spatial' expression of national planning policy and acts a sister document to Planning Policy for Wales (Edition 10). Its role is to set the guiding framework for

where large scale change and nationally important developments will be focussed over the next 20 years.

South East Wales Region

7. The South East Wales Region is proposed as a major focus for growth. The region comprises the administrative areas of the following unitary authorities:
 - Cardiff Council, Merthyr Tydfil, Monmouthshire County Council, County Borough Council Rhondda Cynon Taff County Borough Council, Torfaen County Borough Council and the Vale of Glamorgan County Borough Council.
8. With a population of over 1.5 million in the South East Wales Region, the NDF sets out proposals for major sustainable development aimed at reducing commuting and travel and providing housing and proximate employment opportunities to facilitate those aspirations.
9. Previously separate policies for Newport and Cardiff are now combined into new Policy 33, which incorporates the wider National Growth Area. The policy sees this part of Wales as the main focus for growth and investment.

New Policy 33

National Growth Area - Cardiff, Newport and the Valleys Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region.

Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.

The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. 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.

Implications for Infrastructure

10. As well as other necessary infrastructure, the focussed growth will give rise to an inevitable increase in the amount of commercial and industrial waste which is not managed by existing municipal waste facilities.
11. The private sector leads investment in the energy and waste sectors and the diversity and level of provision to ensure a sustainable and resilient energy supply.
12. There are limited references in the NDF to waste infrastructure or the role that such independent facilities can play alongside renewable energy, with the exception of Policy 19 – Strategic Policies for Regional Planning, where it states that:

Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region (and where required constituent LDPs), among other things:

- *a co-ordinated framework for minerals extraction and the circular economy, including waste treatment and disposal.*

13. Such Strategic Development Plans would need to be prepared and be consistent with Planning Policy for Wales.
14. It is noted that Policy 19 refers to waste *treatment*, rather than the more collectively used term of waste *management*. It is unclear if this is significant in this context, but it could be at odds with PPW which states in respect of waste infrastructure at para 5.1.3.12:

For all wastes, suitable locations for sustainable waste management development should be identified in development plans...
15. It is considered that the provision of strategic waste infrastructure is an issue of strategic importance and, in the context of a National Growth Area, of national importance. The application for the Môr Hafren Energy Recovery is being dealt with as a Development of National Significance.
16. Supporting waste infrastructure needs to be aligned to growth aspirations to ensure there are sufficient facilities in the right place at the right time.

Môr Hafren Energy Recovery Facility

17. The proposed ERF is a privately funded and financed initiative that will provide a merchant facility with 200,000 tonnes per annum capacity to deal with residual waste arising from the commercial and industrial waste sectors.
18. The ERF has a positive role to play in providing a sustainable waste management solution that recovers value from waste to provide outputs as electricity and reduce the reliance on landfill.
19. The proposed ERF provides a local waste management solution that assists in responding to the level of demand afforded by growth. It will assist in ensuring that waste is dealt with in proximate manner, minimising emissions to air afforded by long distance transportation.
20. The proposed development comprises an ERF, fuelled by residual waste (i.e. that commercial and industrial waste remaining post treatment and destined for landfill), to generate electricity that will be exported to the local electricity network via the District Network Operator (DNO), Western Power. It is anticipated that the 15MW of electricity generated will be used locally to support local businesses, housing and infrastructure. However, if at any time there is a surplus that would be exported to the National Grid.
21. The proposed ERF will process up to 200,000 tonnes of mainly residual commercial and industrial waste per annum to export around 15MW of electricity to the local network. The electrical output is equivalent to the requirement of around 30,000 houses.
22. The ERF would be a recovery operation under the Directive 2008/98/EC on waste (Waste Framework Directive) and is designed to achieve R1 Recovery Status with the ability to export heat as well as electricity.
23. The proposed ERF will make a major contribution to the waste hierarchy by diverting up to 200,000 tonnes of waste from landfill per annum and contribute to an overall carbon saving.
24. During construction, the proposed ERF will give rise to direct employment at full time equivalent levels of around 356 jobs annually over the three-year construction phase.
25. As well as direct employment, the proposed ERF will create indirect and induced employment opportunities as a consequence of how the supply chains operate. Indirect and induced employment levels are calculated to provide an addition 461 full time equivalent jobs per year of construction.

26. The total direct, indirect and induced employment equates to 772 full time equivalent jobs per annum.
27. The proposed ERF will also generate additional Gross Value Added (GVA) through wider economic activity. Over the three-year construction phase, this is calculated to be worth £74.7m.
28. During its operational phase, the ERF would provide 25 full time, skilled jobs. Indirect and induced employment levels are calculated to be around 32.5 in the local area and a further 36 full time equivalent jobs in the wider area.
29. The proposed ERF will also generate additional Gross Value Added (GVA) during its operational life. This is calculated to be worth up to £15.7m in the local impact area and up to £43.73m in the wider impact area.

Conclusions

30. As well as employment and economic opportunities, the proposed ERF will:
- provide a local waste management solution that supports the growth aspirations for the locality;
 - provide 15MW of electricity to the local grid, via the District Network Operator, and will support local businesses, housing and infrastructure as well as providing opportunities for private wire transmission to support local businesses and investment into the area;
 - provide opportunities to provide heat to local businesses, and
 - contribute to sustainable waste management and the Welsh Government's zero waste at 2050 ambitions by providing a solution that assists the transition by diverting residual waste from landfill, energy recovery and moving the means of management up the waste hierarchy.
31. Overall, it is considered that the proposed Môr Hafren ERF would contribute significantly to the aspirations in the NDF. The NDF should allow for flexibility in policy to include for the development of such independent infrastructure to support the envisaged municipal waste management infrastructure.

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