

RESIDENTS AGAINST THE CF3 INCINERATOR
DNS 3236340 – HEARING DAY 5

SUPPLEMENTARY REPRESENTATION - ALEXANDRA DOCK FACILITY

INTRODUCTION

The Residents Against the CF3 Incinerator were invited by the Planning Inspector to make a supplementary representation at the end of the Day 5 Hearing Day due to the uncertainty surrounding the Alexandra Dock facility in Newport.

This uncertainty arose due to a lack of information relating to:

- Whether Planning Permission had been granted,
- Whether the proposed development is an Energy from Waste facility?

The Planning Inspector invited evidence so as to be able to determine if the Alexandra Dock facility had planning permission and should be included when considering the need for Energy from Waste facilities in S. E. Wales.

ALEXANDRA DOCK PLANNING BACKGROUND.

The most recent application on the Newport City Council Planning website is: [21/0091](#), which was approved on 11th March 2021. This was a discharge of planning conditions 11 and 12 of application [19/0599](#), which was granted planning permission on the 12th Sept 2019.

We note CoGen, the holding company for Mor Hafren Bio Power Ltd, is the agent for application 21/0091. CoGen have also developed the proposal for the clearance of the development site within this application.

The planning permission history for this site is extremely convoluted and includes other planning applications commencing with 10/1238, then 15/1050, 17/1185 and 18/0911. The initial application was for a bulk drying and Pelleting facility with an on-site Energy centre.

IS THE PROPOSED DEVELOPMENT AN EfW?

The planning statement for 19/0599 includes reference to HGV transport movements to the proposed development, e. g. feedstock and ash and waste removal, see below.

Phase/Type	Traffic Movements (Worst Case)				Routing				Vehicle Mix (Worst Case per Day)						
	Daily		Peak Hour		Origin		Destination		HGV		LCV/ LGV		Cars/ Bikes		
	Old	New	Old	New	Old	New	Old	New	Old	New	Old	New	Old	New	
Construction Phase															
Equipment	120	100	15	15		Overseas	Newport Docks	Newport Docks	120	100					
Personnel	80	66	40	40	5-15 miles	5-15 miles	Newport Docks	Newport Docks						80	66
Operations															
Feedstock Delivery	200	166	20	20	5-150 miles	5-150 miles	Newport Docks	Newport Docks	200	166					
Ash Removal/ Pellet offtake	24 +3.6 peak hours	20	6	6	Newport Docks	Newport Docks	5-150 miles	5-150 miles			24	20			
Consumables Delivery	10	8	2	2	5-50 miles	5-50 miles	Newport Docks	Newport Docks			10	8			
OS&M Personnel	40	32	40	32	5-15 miles	5-15 miles	Newport Docks	Newport Docks						40	32
Other	10	10	4	4	5-50 miles	5-50 miles	Newport Docks	Newport Docks						10	10

Table 4.1: Comparison of Projected Traffic Movements

- It should be noted that the above estimate is based on the net calorific value of the feedstock being the same on average as that used for the design of the plant (10MJ/kg) and that HGVs deliver full payloads (28 tonnes of feedstock per HGV). In so far as there is the potential for deviation from such assumptions, this may result in an increase or decrease in such traffic movements but it is not expected these would be greater than +/- 20%.
- The same principle applies to ash and waste removal movements and consumable deliveries to the extent these are correlated with feedstock.

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The application documentation for 21/0091 also includes reference to a site visit report by Harris Pye, dated 5th Feb 2019 to the Newport 20MWe Waste to Energy project.

“Harris Pye are currently offering to design, supply, install and commission, on an EPC basis, a 20 MWe waste-to-energy (WTE) plant firing RDF (refuse derived fuel) on a brownfield site in Newport, South Wales, NP20 2JY, within the Associated British Ports (ABP) area. A 2-hour site visit was undertaken to assess the site, including land type, ground condition, access and location. No intrusive ground sampling was carried out as this will be done at a later date”.

The documentation for planning application 21/0091 includes a site layout drawing, titled “Newport Energy from Waste plant”, for a client RDF Energy No. 1 Ltd, which shows an incinerator hall, air pollution control, fly ash pit, residue ash silo, pac silo, lime silo and feedstock pits. We have attached this evidence separately (Site layout for Newport Energy from Waste plant, Alexandra Dock planning application 21/0091).

Other sources reference that the proposed development at Alexandra Dock is an EfW, e. g. <https://www.andusia.co.uk/wte-plants/newport-efw-plant/> and [https://wikiwaste.org.uk/index.php?title=Newport Alexandra Docks](https://wikiwaste.org.uk/index.php?title=Newport_Alexandra_Docks).

Both these sources indicate the EfW feedstock will be provided from the commercial and industrial waste arisings in S. E. Wales.

CONCLUSION

The evidence provided above confirms that the Alexandra Dock site has planning permission, construction work has commenced and planning conditions to clear the site have been discharged. This evidence also supports NRW’s latest response, page 5, para 4.

Further the evidence submitted from planning application 21/0091 strongly suggests that an Energy from Waste plant will be constructed on this site.

It is not clear from the application documentation what the feedstock for the Energy Centre CHP is but there are strong indications from other sources it will be RDF, sourced from S. E. Wales.

On this basis we request that the Alexandra Dock EfW capacity should be factored into the Energy from Waste capacity in S. E. Wales when considering the need for the Mor Hafren proposed EfW.