

Dear Pins

Please find NRW's comments on the six matters set out below. I have consulted with colleagues in Newport Planning Department and NRW Permitting Service.

i. What is/are the substantive operative planning permission(s) for the site?

Having discussed the planning permission directly with the LPA case officer, it has been confirmed that Newport consider permission 19/0599 as the operative planning permission on site.

ii. Is there planning permission for an energy from waste facility at this site?

The 17/1185 officer report states that 'the original consent allowed energy generation using natural gas, it also allowed the drying and pelleting of a waste feedstock. The pelleting was for export to third parties. The proposed varied scheme no longer proposes the use of natural gas for energy generation. Instead a synthetic gas would be extracted from the waste feedstock and this would be used to generate electricity, the power output would be reduced from 28MW to 20MW. It is also no longer proposed to undertake the pelleting process for export to third parties (paragraph 5.2.6).

The 19/0599 officer report explains that the 17/1185 permission is the current consent for the scheme (paragraph 5.2.2). It continues 'the elements of the 17/1185 permission which are carried through to this proposal; and which differ from the original (10/1238) permission are a proposed stack height of 45m (+/-5m), although it is proposed to move it 35m south east of its previously approved position and *the same technology to convert the waste material to the finished energy product (Our emphasis)*. The proposed power output also remains to be up to 20MWe (paragraph 5.3.1).

From discussions with the LPA case officer, they confirm the above was their understanding at that time, however they are not able to confirm, either way, whether there is planning permission for an Energy from Waste facility.

iii. If so, has the development commenced? Is there recent active progress regarding the discharge of conditions?

The planning authority confirms all pre-commencement conditions on permission 19/0599 are discharged. Works to construct the access commenced in 2016. They understand that a restart on site began April this year but cannot confirm this.

iv. What evidence is there that the development of an energy from waste facility using residual waste as feedstock is being actively progressed at Alexandra Dock?

NRW's only involvement from a permitting perspective has been an initial pre-permitting application meeting in August 2019 for the Alexandra Dock site. The pre-application form for advice includes the section 'Details of the proposed new activities'. This was completed by the consultant and stated:

"Construction and operation of a waste-to-energy plant processing pre-processed waste with biogenic content using a moving grate technology/boiler/steam turbine with abatement necessary to comply with applicable law and BREF guidelines.

When operational, the plant will normally receive baled and/or loose refuse derived fuel (RDF) as the feedstock to generate up to 20MWe (net) for export to the local grid and/or to local companies within Newport Docks. The plant will be constructed to be CHP-capable. To service the plant's feedstock requirements, RDF bales will be stored externally, immediate adjacent to the plant.

The plant has full planning consent from Newport City Council and NRW was consulted at all stages.

A copy of the Site Location Plan (Attachment 1) and the current proposed layout (Attachment 2) are appended to this application form."

The plan referenced above and submitted with the pre-application advice information is the same plan labelled Figure 2 in the document 'Supplementary Design & Access Statement (No M4 Relief Road) June 2019' submitted under permission 19/0599 (Plan titled 'Document L011/2019: Site Plan & Layout').

However, it should be noted this information was provided for initial pre-application advice. It is not uncommon for the designs to change by the time a permit application is submitted.

v.What evidence is there concerning the likely feedstock capacity of the proposed facility and the probable source/supply of this?

The planning authority or NRW hold no evidence of the likely feedstock capacity of the Alexandra Dock facility.

vi.Is the prospective operator in discussion with NRW regarding an Environmental Permit application? If so, what stage have discussions reached?

As of 16 July 2021, no permit application has been received for a facility at this site. The pre-application meeting in August 2019 remains the only discussions NRW have held as the permitting authority for this site.

I trust this helps the appointed Inspector. Please get in touch if there are any further queries.

Regards
James Davies

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