

From: Bleddyn Lake
Sent: 01 February 2021 15:27
To: Correspondence mail – JJ; Thomas, Lewis (ESNR-Planning)
Cc: Correspondence mail - LG
Subject: URGENT - Request to call in proposals to convert Uskmouth Power Station

Dear Julie James MS,

I hope you are well.

In May 2020, Friends of the Earth Cymru asked the Welsh Government to officially ‘call in’ the proposal to convert the old Uskmouth Power Station near Newport into a power plant which would burn ‘waste’ derived energy pellets.

The response you kindly sent us (29th May 2020) stated that:

‘I note your correspondence also refers to call-in under section 77 of the Town and Country Planning Act 1990. As there is currently no planning application before the LPA, the Welsh Ministers cannot consider the matter of whether the application should be called in or not at this stage. However, should an application for planning permission be made to the LPA, and a request to call it in be made in writing to the Welsh Ministers, it will be considered without prejudice, in line with the relevant guidance on calling in planning applications. ‘

We would like to now formally request again that Welsh Government ‘call in’ this proposal under the Developments of National Significance or if these are not applicable in this instance, under section 77 of the Town and Country Planning Act 1990.

We apologise for the late notice of this request, but it only came to our attention on Friday (29th January) that this application will be discussed by the Newport Council Planning Committee on Wednesday 3rd February.

We believe that this proposal is of significant national interest given the scale of the proposed annual climate emissions from the plant and we therefore believe that the Welsh Government should make the determination on this scheme.

We believe that this proposal would contradict and contravene different Welsh Government targets, policies and recommendations, specifically those set out in PPW, the Environment (Wales) Act, the Well-being of Future Generations (Wales) Act, national carbon budgets and emission reduction targets, recent UK Committee on Climate Change ‘The Path to a Net Zero Wales’ report, the Clean Air Plan, the Collections, Infrastructure and Markets (CIM) Sector Plan, Clean Air Plan, Towards One Wales : One Planet, and also those in the more recent Beyond Recycling consultation document as it would be counter intuitive to our desire to move to a truly circular economy in Wales.

We are forwarding our original submission along with our objections to Newport Council.

In addition, we would also like to make the following points in relation to this proposal.

Despite the fact that we, in addition to organisations such as CPRW, have officially objected about this scheme to Newport Council, we have had no official acknowledgment of our objection and there

appears to be no reference made of our objection by Newport City Council Officers to the Planning Committee. Conversely they appear to attach undue weight to assumptions, statements and assurances from the developers (see articles 7.9, 7.10, 7.12, 7.17, 7.18 and 7.19 from <https://democracy.newport.gov.uk/documents/g7941/Public%20reports%20pack%2003rd-Feb-2021%2010.00%20Planning%20Committee.pdf?T=10&LLL=0> as examples). Our objections regarding climate emissions for example have not been mentioned and therefore no weight is given to these objections and as such, discussion of these issues is at best incomplete and without sufficient detail.

Despite our initial objection, we were not informed of the timeframe of this Planning process or therefore given the opportunity to comment further and only found out that the NCC Planning Committee would be considering this decision last Friday when the papers were published on the NCC website.

The companies own figures suggest that the plant will be responsible for an estimated annual emission of carbon dioxide of 1,550,000 tonnes. The Uskmouth plant has been mothballed since 2017 so these emissions will be new emissions. The company claim that any emissions should be judged against the equivalent emissions of coal being burnt. As coal is not being used in this plant and hasn't been since 2017 then this argument is nonsense. These would be new emissions in Wales and would therefore need to be counted as Welsh Emissions under the Environment (Wales) Act 2016 (Part 2 number 34) which states that ...

Net Welsh emissions

(2) "Welsh emissions" of a greenhouse gas are—

(a) emissions of that gas from sources in Wales...

As we make clear in our original objection, adding this amount of new emissions into the mix will require the Welsh Government to reduce emissions elsewhere to 'offset' these new emissions in order to comply with carbon budgets.

An important point to recognise here, in relation to the above point, is where this new fuel would be coming from. [N+P Group](#), who produce these new 'Subcoal' pellets would be taking waste from all parts of the UK, not just Wales. This would mean that we would be importing 'waste' into Wales which would in itself counteract the proximity principle but would also obviously also be importing the subsequent emissions from this Subcoal and classifying them as Welsh emissions. We quite clearly have enough of a challenge on our hands in Wales in reducing our climate emissions without specifically importing additional emissions into the mix, especially for a project that isn't needed.

The company itself has stated ([page 40](#)) that their fall back option (if they weren't given permission to convert this station) would be to re-energise the existing plant and burn a mix of coal and biomass. This seems like an 'agree or we will do something even worse' scenario. Given the Welsh and UK Governments plans to remove coal from the UKs energy systems by 2025 anyway (*From [Coal Policy in Wales consultation - It is UK policy to remove coal from energy generation. Currently, UK Government plans to phase out unabated coal fired generation by 2025. Wales supports this aim in delivering our emissions targets and Planning Policy Wales already places fossil fuels at the bottom of the energy hierarchy. This policy proposes the use of coal for generation of power in Wales will not be permitted, given there are a range of other low carbon energy technologies. Welsh Government will also consistently and actively seek the UK Government's commitment to reducing and in time eliminating the extraction and consumption of fossil fuels.](#)*), this seems like a bizarre and empty statement, particularly at a time when the energy generating mix in the UK has shifted so [dramatically](#).

I am forwarding the email I originally sent to you and to Newport Council (below) with both attachments which outline some of our objections.

I am copying in the Minister for Environment, Energy and Rural Affairs to this email as this proposal also cuts across her portfolio.

With the eyes of the world on the UK this year due to the COP 26 talks being held in Glasgow in November, with [public opinion](#) clearly showing the need and desire to take action and given that we are in a climate emergency we surely can't be giving the go ahead to new projects like this in Wales.

Again, we apologise for the tight timescale on this but as this situation is urgent, both in terms of the NCC Planning process but also obviously more importantly, our climate, we urge you to call in this proposal so that it can be assessed against national Welsh Government targets.

Yours sincerely

Bleddyn Lake

Campaigns and Development Manager / Rheolwr Ymgyrchoedd a Datblygu

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Nid yw'r farn bersonol yma o reidrwydd yn adlewyrchu polisi Cyfeillion y Ddaear.

These personal opinions do not necessarily reflect the policy of Friends of the Earth.

From: Bleddyn Lake

Sent: 22 May 2020 15:06

To: Correspondence mail – Julie James

Cc: Correspondence mail – Lesley Griffiths; Correspondence mail – Hannah Blythyn

Subject: Request to call in proposals to convert Uskmouth Power Station

Dear Julie James MS,

I hope you are well.

We have recently become aware of the proposal to convert the old Uskmouth Power Station near Newport into a power plant which would burn 'waste' derived energy pellets.

We have submitted our objections both to Newport Council and also to NRW in regards to their recent consultation on these proposals.

Friends of the Earth Cymru wish to formally request that the Welsh Government calls in these proposals under the Developments of National Significance.

We believe that this proposal is of significant national interest given the scale of the proposed annual climate emissions from the plant and we therefore believe that the Welsh Government should make the determination on this scheme.

I am forwarding the email I sent to Newport Council (below) with both attachments which outline some of our objections.

We believe that this proposal would contradict and contravene different Welsh Government targets, policies and recommendations, specifically those concerning climate emissions, those set out in PPW, the Environment (Wales) Act, the Well-being of Future Generations (Wales) Act and also those in the recent Beyond Recycling consultation document as it would be counter intuitive to our desire to move to a truly circular economy in Wales.

I am copying in the Minister for Environment, Energy and Rural Affairs and the Deputy Minister for Housing and Local Government to this email as this proposal also cuts across their portfolios.

Given that we are in a climate emergency we can't be giving the go ahead to new projects like this in Wales.

We therefore hope that the Welsh Government will agree that it is a DNS and call it in so that it can be assessed against national Welsh Government targets.

Yours sincerely

Bleddyn Lake

From: Bleddyn Lake

Sent: 22 May 2020 13:55

To: Planning@newport.gov.uk

Subject: 19/1313 | EIA SCOPING OPINIION FOR CONVERSION OF ELECTRICITY GENERATING STATION TO COMBUST ALTERNATIVE FUEL AND ASSOCIATED DEVELOPMENT AT USK MOUTH POWER STATION, WEST NASH ROAD. | Uskmouth Power Station West Nash Road Nash Newport NP18 2BZ

Dear Sir/Madam,

I hope you are well.

Please find attached 2 documents relating to our objection to the Uskmouth power station proposal.

Yours sincerely

Bleddyn Lake

Bleddyn Lake

Campaigns and Development Manager / Rheolwr Ymgyrchoedd a Datblygu

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Nid yw'r farn bersonol yma o reidrwydd yn adlewyrchu polisi Cyfeillion y Ddaear.

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