

From: [REDACTED]
To: [REDACTED]
Subject: FW: TO/JJ/00326/24 - Fw: Bedwas Tip reclaim issues/questions
Date: 13 February 2024 15:56:34
Attachments: Outlook-lu244roj.png
Bedwas Public Consultation Ad_1 rev1.pdf
Bedwas Public Consultation Ad_2 rev1.pdf
Bedwas Public Consultation Ad_3 rev1.pdf
Re Fw Bedwas Tip reclaim issuesquestions.msg
image001.jpg

From: [REDACTED]
Sent: Tuesday, February 13, 2024 3:54 PM
To: [REDACTED]
Subject: TO/JJ/00326/24 - Fw: Bedwas Tip reclaim issues/questions

Good afternoon,

More info below and attached for TO/JJ/00326/24.

Thanks,



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Tuesday, February 13, 2024 2:48 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Fw: Bedwas Tip reclaim issues/questions

[REDACTED]

Thanks again for your feedback and the questions raised.

The Information Paper is going to be uploaded to our website today and will be able to be accessible through this link:
<https://erireclamation.co.uk/bedwas/>

I am more than willing to send you a copy of the paper when the final draft is ready. This same link takes you to our Environmental Impact Assessment, Transport Assessment and Planning Statement amongst a number of other documents and combined these give a very detailed precis of our project. As I have recommended to others, the Non-Technical Summary document is a useful read as it summarises the project and technical information/findings.

We have a consultation event planned in Cwmfelinfach on 21st February and I have attached details of all our events as you are more than welcome to attend one or all of them. We are currently trying to extend the Cwmfelinfach event on 21st February from 1830 to 2000hrs (venue allowing) appreciating that people work. At this event we are proposing to make a presentation on the project and the haul route at around 1830 then have a Q&A session thereafter. We are in the process of setting a date for a new consultation event which is likely to be at Crosskeys Rugby Club but a date is yet to confirmed as we are awaiting feedback as to when the venue is available. When I know, will send over the details of this event too.

Addressing some of the points you make specifically, as requested:

- The presence of coal within the coal tips is the contaminating and safety factor and reclamation of coal tips cannot deliver the benefits of reclamation without its removal. Our reclamation project will take a Category D tip (most at risk category) to a Category A tip (least at risk) and will in the process remove the financial burden for inspecting and interim safety works off CCBC as well as the latent risk of having to remediate these tips at some point in the future at huge cost to the public purse (a few years back CCBC estimated the cost of remediating these tips to a safe state to be in the order of £30-40 million which is likely to be higher now given the impact of inflation and market costs).
- Removal of the coal off-site is therefore a critical aspect of delivering the project benefits and this will need to occur regardless of whether this is done as a private or public project - coal needs to be transported away. Therefore, given the haul route enables the removal off-site of the separated coal it is also a critical aspect of the project. As such, this

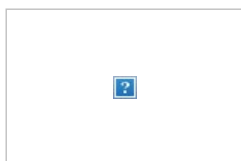
haul route needs to be one which can actually be guaranteed and delivered for the project (again regardless of whether it is a public or private project). Without a haul route, the project benefits cannot be delivered by any organisation private or public.

- When deciding upon a preferred option for a haul route a number of considerations must be factored in including: deliverability of the route, ability to actually physically pass down the route, safety, minimising impacts on local roads and communities, environmental impacts, damage to public roads, congestion, noise effects on sensitive receptors, highway authority policies and requirements, length, condition, height rises, ownership and cost and so on. All these factors (plus others) lead to a decision and the preferred haul route option has been proposed because on the balance of all these factors it is the least impactful route. Therefore, the decision-making process isn't really by commercial factors but a range of other more important factors when assessing the options.
- The location of the tips is a challenging one and there are few options for a haul route none of which are perfect including the preferred option. So, we have to decide on balance which route can deliver the benefits of the reclamation scheme and cause the least impact across all factors of consideration. In overview, there are 5 possible haul routes of which the preferred route and the one you mention below are two of them. All routes would require works to enable then to be useable, even the one you refer to, which incidentally, is being proposed as the staff entrance route and for use by smaller vehicles.
- Our estimated use sees around two lorry movements an hour during normal working hours outside which it won't be used as a haul route.
- There is a general presumption by planning and highways authorities that the use of single carriageway public roads should not be considered as part of HGV/lorry routes and are often refused by highway authorities if they do propose such roads - normally done again after consideration of the factors I have listed above. On the many projects I have worked on, highway authorities actively discouraged the use of single lane or even narrow double-lane roads as temporary haul routes together with routes which pass directly in front of sensitive noise receptors like residential properties.
- The Information Paper is in the process of being uploaded but thought I would provide some level of feedback ahead of it so you can understand a bit better the considerations.

So, in summary, the decision-making process is based on a number legitimate factors all of which have to be considered during the process of assessing the preferred option i.e. commercial factors are by far not the most important factors. The considerations I have broadly set out above are those normally required when assessing appropriateness of HGV routes and have been applied across every project I have worked on in my career.

I am more than happy to talk through all aspects with you and am available in any way you might want to discuss further.

Regards,



[Redacted signature block]

From: [Redacted]
Sent: 13 February 2024 06:54
To: [Redacted]
Cc: [Redacted]
Subject: Re: Fw: Bedwas Tip reclaim issues/questions
[Redacted]

Thank you for your email,

I would be grateful if you could answer my specific questions, and also send me a link to your information paper. Which I'm assuming you are expecting people to go and find somewhere on your website, rather than pro activity telling people. I'm

sure that my councillors will pass comments if this is the 1st they heard of this paper.

Unfortunately you only seem to have one pre - application event days in Cwmfelinfach (which seems to be an after thought) which, I believe, is mid week during working hours. I, as most people, have a job so will not be able to attend. I did note that you didn't mention when or where the event is in your response.

I would most certainly welcome you answering my question and clearly going through your decision processing regarding the route, and I think you should publication that decision making for scrutiny and full transparency. I would also question why you are not actively doing this anyway!

I say this as the route to the A472 is flat wide and easier to navigate than the forest tracks down the mountain while driving an HGV. The A472 is the main dual carriage way for HGV lorries and the route down the A467 is the route HGVs use rather than the road through Cwmfelinfach. This is the route for HGVs travelling to and from M4, Newport, Cardiff, Monmouthshire etc... which you have easy access to... or at least easier than carving through a country park and down a steep sided mountain.

With this in mind I find your decision nothing more than commercial. The route I have just suggests will bring you back to the full moon roundabout on the A467. This route is less intrusive route, and onto the HGV route to and from the M4 and Newport. So please explain specifically why this route is not the preferred route? I'm really struggling to see anything other than profit margins!

I look forward to your response, which I hope will hold some detail in answering the questions, as at the moment I don't have any answers to the questions raised.

Thank you

On Mon, 12 Feb 2024, 11:27 pm [REDACTED] wrote:

[REDACTED]

I have been forwarded your email below by [REDACTED] whom I work with on this project, particularly around the forthcoming pre-application consultation events and consultation generally. I was also the ERI member who attended the December consultation event alongside [REDACTED] and others, attended by your ward councillors.

Thank you for your email and the comments contained within it.

I have been collating the various consultation comments and representations we have received throughout our pre-application consultation and there are various themes and questions which are common amongst them. So, in response, we have produced an Information Paper which seeks to provide clarity on these many themes and questions and this should be published tomorrow as I sent it over to our web team this evening for upload. This particular Information Paper provides information on the project principles and the proposed HGV haul route and we are intending to add other papers on other aspects of the project in due course, but this is the first.

Ahead of the Information Paper and the consultation events, I would like to reassure you that the proposed HGV haul route was selected as the preferred route after assessing all others (of which there are very few given the remote location, topography and nature of the tips we are proposing to reclaim) and that a commercial decision was certainly not the driver in deciding upon the preferred option. What is clear is that access to and from the site is difficult at best but especially for HGVs, which are a crucial part of delivering the benefits of the project. We assessed all possible routes and within the Information Paper we have provided a summary and plan of the preferred route and the alternative options considered. I am more than happy to discuss our decision-making process with you in detail because, unfortunately, HGVs don't have the same liberty over roads as cars do so there are a host of wider considerations which might not be immediately apparent to you when selecting dedicated lorry routes.

I am personally attending all the pre-application consultation events and so will be more than happy to discuss any aspect of the project with you and provide feedback on all of the matters you raise. I genuinely hope to see you at our consultation event if you can make it. If not, lets catch up anyway to discuss.

Regards,

[REDACTED]

[REDACTED]



From: [REDACTED]

Date: 11 February 2024 at 16:14:53 GMT

To: [REDACTED]

Subject: Bedwas Tip reclaim issues/questions

Good Afternoon,

This email is mainly directed to Energy Recovery Investments Ltd, but I have copied in relevant government officials to ensure that the correct scrutiny is in place before any planning application is submitted.

I must confess that I don't have all the detail, as it seems this has been discussed with almost everyone except the people being impacted, which is something that I find strange. I won't dwell on the fact that the people of the Sirhowy Valley have not been consulted in any way, or engaged in the conversation, as that will not change the fact. What I will say is that thankfully our councillors have found out about the plans and I trust will now be kept abreast of any further developments and discussions.

I will now go through a few points that I have noticed, and I do take into account that you are a commercial company and therefore looking to make a profit out of this venture, which probably accounts for the questions that I will be asking.

There are currently 4 category D tips at the location that you submitting your proposal, why are you only planning on making 2 safe? In fact, I understand that you also plan on building on to one of the tips (making it less safe). This doesn't seem like a very good ethos of The only company in the UK specialising in this type of work, I would expect that within in your core values if you are working in an area you would want to make it safe across the board and build that into your business case.

The next part that I would like to pick up is your value to the surrounding natural environment in which you will be working, obviously these tips are in areas of countryside, and this one in particular in close proximity to the Sirhowy Valley Country Park and is also on a number of nationally acclaimed footpaths. There is also the cycle track route 47 running through the country park which runs from Newport to Pembroke. Further to this there is a number of sites of historical importance (your paperwork doesn't highlight them all and misses at least 2 bronze age burial sites).

With this in mind I would like to understand why your proposed route to remove coal is to go through the Sirhowy Valley Country Park, which is a local tourist attraction and has been increasing its profile on social media for the past 3 years with walkers and cyclist. The route your company has recommended will cut through the country park and make it unusable, and thus thwart the work being done to connect Cwmcarn to Penallta as active travel route (something the Welsh government is promoting). I strongly suspect that your rationale for selecting to promote this route is purely commercial and nothing to do with any interest in the countryside. The route that you have selected will give your lorries the quickest (and cheapest) route to a dual carriage road to move the coal to a different location, any other route off the mountain will mean extended travel time and cost.

Please can you explain your rationale behind this decision and why the option to take the coal to the A472 and down the A467 was not put forward as this would appear to be the least invasive route as there is already tracks in place and the ground is level, means there isn't a need to zig-zag heavy lorries down a mountain side. I would strongly believe that it is a purely commercial decision, as it would add driving time and distance to your drivers and therefore reduce your profits.

It seems to me that you are proposing to do less than half a job on making the category D tips safe and further to this planning on destroying the natural beauty in the most invasive way possible. I think that we can all agree that tips that are a danger need to be actioned, but not to the devastation of nature around them, and at the

expense of private company profits. You will obviously need to make some profit, but I have a feeling that the profits may be the driver here rather than the good of the countryside.

I will look forward to your response.

[REDACTED]