From: [redacted]
Cc: [redacted]
Subject: Request for Screening Decision on proposed waste Incinerator, Vale of Glamorgan. For 29 July 2008
Date: 23 July 2015 12:53:22

To [redacted], Minister for Natural Resources and Planning, Welsh Government

cc. Planning Directorate, Planning Decisions Office

Dear Minister,

Request for a Screening Opinion under EIA Regulation 4

***Sunrise Renewables (Barry) Ltd, Outline application for a wood fired renewable energy plant, Woodham Road, Barry, 2015/00031/OUT,* for decision on 29 July 2015.**

We would ask you to make a screening decision on this application for a waste-wood combustion plant ('incinerator' under EU law), which is being considered for decision with no Environmental Statement by the Vale of Glamorgan Council, in contravention of the EIA legislation. Though the purpose is said to be 'energy recovery' it is not a CHP plant but intends to waste the heat output, contrary to Welsh policy.

1. The NRW wrote in response to FoE: *A plant of this capacity (over 100t/day) would appear to fall under a Schedule 1 development, Category 10, however this is a decision that would be made by the Local Authority*. The applicant (and officers) claim it would meet the "R1" energy efficiency criterion needed to satisfy TAN21 and European levels, but their figures are wrong and lack any verification by qualified persons.
2. The VoG officers have screened it as an EIA Schedule 2 development, saying it would have 'no significant environmental effects', but their screening pro-forma (compiled late, in June) has clear and substantial errors, saying wrongly that its impacts are no different to an earlier application on this site in 2008/9.

The Secretary of State screened the previous 2008/9 application twice, once as Sch.1 waste-disposal and then as Sch 2 'energy recovery'. The "R1" criterion for energy recovery is now in legislation; a new screening decision now has to be made in the light of that and of general experience that non-CHP biomass plants come below the "R1" threshold. We point out the absence of *validated* information that the planned technology could have exceptionally high efficiency to exceed the "R1" threshold.

Should the new screening decision not agree with the NRW point 1 (ie. EIA Sch.1, Cat.10), we would ask that it consider that this large industrial plant close to housing and the regeneration area of Barry Waterfront is likely to have significant environmental effects and therefore qualify as EIA-development.

The application documents including the Ssreening Pro-forma are on the VoG website at

[redacted]

and the Planning Report and Late Reps are at

[redacted]

[redacted]

We attach our outline case as word-file. As the council's Planning Committee is scheduled to take a decision at its 29th July meeting, we would ask for your preliminary agreement by that date that there is a *prima facie* case for Screening it as an EIA-development. Would you also notify the

Council not to grant planning permission pending the final screening decision?

We are ready to supply further information as you might require.

Yours sincerely,

[redacted]

for *Barry & Vale Friends of the Earth*

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