



# Friends of the Earth Cymru Cyfeillion y Ddaear Cymru

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

Dear Sir/Madam,

We have recently been made aware of the above proposal.

We would like to register Friends of the Earth Cymru's formal objection to this plan.

We have also submitted an objection to Natural Resources Wales (NRW) for their recent consultation on this issue.

Please find attached our objection to NRW and please accept this cover letter and the attachment as our formal objection to Newport City Council.

We believe that Planning Policy Wales (Edition 10) December 2018 provides relevant guidance for this Uskmouth proposal and that this guidance supports our call for the Uskmouth proposal to be refused.

We believe the Uskmouth scheme would run counter to the National Sustainable Placemaking Outcomes in Planning Policy Wales (<https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>), specifically in regard to outcomes such 'clean air', 'reduces overall pollution' and 'resilient to climate change'.

PPW (page 24) states that: *'Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle.'*

We believe that this planning proposal does not conform to the Well-being of Future Generations Act and the Sustainable Development Principle.

PPW also states (page 25) that: *'will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and does it support decarbonisation and the transition to a low carbon economy.'*

We believe that the proposal for Uskmouth Power Station and its stated intention to release an estimated *'annual tonnage of carbon dioxide of 1,550,000 tonnes'* clearly therefore cannot possibly support the transition to a low carbon economy.

PPW (page 99) states: *'The principles of the circular economy represent a move away from the current linear model of make, use, dispose, towards the reuse, repair and recycle of wastes which arise during development. The planning system facilitates materials recycling through advocating the use of secondary aggregates in construction but circular economy principles should underpin all developments.'*

Friends of the Earth Cymru believes that burning plastic, paper and cardboard is diametrically opposed to the principles of a circular economy.

Additionally, and crucially, we note that PPW states (page 87): *'Climate change is a global challenge, with impacts felt at the local level presenting a significant risk to people, property, infrastructure and natural resources. We need to plan for these impacts, reducing the vulnerability of our natural resources and build an environment which can adapt to climate change. The planning system plays a significant role in managing this risk. Development allowed today will be around for decades to come. The most important decision the planning system makes is to ensure the right developments are built in the right places.'*

The Uskmouth proposals are for at least a 20 year time frame. As we mention in our submission to NRW, science tells us we need to act decisively on climate change by 2030. Locking ourselves into a new source of high climate emissions now in the full knowledge that it will be emitting substantial amounts of global heating gases for at least the next 20 years surely contradicts all Welsh Government policies and makes existing climate targets even harder if not impossible to achieve.

We therefore oppose the Uskmouth power station proposal and we will be asking the Welsh Government to 'call in' this proposal under the 'Developments of National Significance' regulations.

Yours sincerely

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