

Mr. R Smith,
Examining Authority
The Planning Inspectorate
Room 3D
Temple Quay House
2 The Square
Bristol
BS1 6PN

4th August 2016

Dear Rynd Smith,

**Re: Application by Wrexham Power Ltd for an Order Granting Development
Consent for the Wrexham Energy Centre**

I wish to raise concerns with regards to the proposed development of the Wrexham Energy Centre on behalf of Kellogg Company of Great Britain Ltd. We don't believe the impact to the Kellogg's site has been effectively and fully assessed in the following areas:

Air Quality

The area of significant concern in terms of air quality is the potential for dust emissions from construction activities. This is of particular concern to Kellogg's given the close proximity of the Kellogg site (and car park) to the proposed development.

The table below from Chapter 8: Air Quality of the Environmental Statement (ES) identified the Kellogg's factory as being a **HIGH** sensitive receptor. The footnote to the table explains this is due to the potential for indirect soiling effects on the property (including the staff car park) from construction activities. However a further screening assessment determined the sensitivity of the area as being **LOW**; a rating we understand is determined from consideration of Kellogg's as one receptor, and the distance of the Kellogg site from the development. We strongly disagree with this assessment. The IAQM Guidance referenced in the ES, clearly states that professional judgement be used to determine the number of human receptors, and gives the example of a school being in the >100 receptor category, and a residential unit being one. We don't believe that professional judgement has been correctly applied to Kellogg's.

Furthermore, when determining the distance from the development site to the Kellogg site perimeter fence (immediately beyond which is the car park and balancing pond with a consented discharge to river) we believe this to be <20m and not the 80m stated in

the table below. We are therefore concerned the error in the distance undermines the original assessment.

Table 8.18: Scheme - Sensitivity of the area to dust soiling effects on people and property results

Receptor	Receptor sensitivity	Number of receptors	Distance from source	Sensitivity of area
2) Plum Tree Farm, B5130 + other nearby properties 3) Marshley Farm, B5130 + other nearby properties	High	14	255m from Power Station Complex Site, >50m of trackout	LOW (10-100 high sensitivity receptors <350m of Power Station Complex Site and <10 receptors for trackout)
4) 4-6 Bryn Lane	High	3	245m from Power Station Complex Site, <50m of trackout	
7) Kellogg's factory (car park) *	High	1	80m from Power Station Complex Site, <50m of trackout	
21) Public right of way 15Y /18	Low	1	15m from Power Station Complex Site, >50m trackout	

Note: The Kellogg's food product manufacturing plant is considered of high sensitivity due to the potential for indirect soiling effects on the property (including the staff car park). The operator will already have in place their own control measures to prevent ambient fugitive dust ingress to their premises from naturally occurring particulates in ambient air. Workers will be covered by occupational exposure regulations hence it is not considered a relevant receptor for human health impacts

We also question the statement in the table, that Kellogg's "will already have in place their own control measures to prevent ambient fugitive dust ingress to their premises from naturally occurring particulates in ambient air". Our control measures do not take into consideration any increased dust from construction activities. Given the proximity, and the level of dust the applicants are projected to create, and the very sensitive nature of our food production process we are concerned the error in their assessment could present a risk to food safety.

On site we have a balancing pond with a consented discharge to the River Dee. The implications of the dust ingress into the balancing pond would potentially result in a breach of our environmental permit requirements should our monitoring limits become exceeded.

Taking the above points into consideration, and in line with the Construction Dust Assessment Methodology used by the consultants, our view is that the level of risk in terms of dust should be raised to HIGH for Kellogg's, with the correct mitigation measures designed in line with this risk.

Traffic – Congestion

We do not believe the traffic impact on Kellogg site access has been fully assessed during construction and operation.

The entrance to site for all construction vehicles will be opposite Kellogg security gates and construction is expected to take 18 months. The ES shows that construction traffic will be directed along Bryn Lane in front of Kellogg's factory and we have concerns that the increased volume of traffic could impact on raw material deliveries and employees getting to the Kellogg site.

With the proposed construction traffic, Bryn Lane is anticipated to experience a 21% increase in total traffic and a 17% increase for HGVs directly outside the Kellogg site.

During concrete pouring there could be up to 300 arrivals and departures a day (for 2-3 days). This would result in a **31-40% increase in traffic** on Bryn Lane, likely over extended working hours (12-20 hours). In line with the suggestions of the construction mitigation strategy included with the application, we strongly recommend that concrete pouring occur onsite to remove the potential spike in HGV movements. This would only be accepted by us with the necessary mitigation measures put in place to control the additional dust.

During construction, 150 oversized vehicle deliveries are expected. These will need to be notified to the authorities and identified in advance to allow for liaison with interested parties. It is likely these will take place overnight. The draft Construction Traffic Management Plan (CTMP) highlighted that there may need to be **temporary road closures** to allow access for abnormal load vehicles, with all closures agreed with the local highway authority and detailed in the CTMP. This document is currently in draft form, and it will be the responsibility of the approved contractor to develop this document. Given the close proximity of the Kellogg site to the construction site, we need to be involved with the approved contractor in the development and approval of the final CTMP, as we have concerns over the impact that road closures may have on Kellogg operations.

Planned Development and Cumulative Assessment

The ES identified cumulative effects from 3 projects:

- **Kingmoor Park Warehouse** is proposed to be constructed in the field adjacent to the Wrexham Energy Centre, with the access route via Bryn Lane. The application is likely to be granted on appeal. In 2012, Kellogg raised concerns on the proposed new warehouse regarding traffic. The Kingmoor application

assumed a peak of 50 HGV's (100HGV movements) per day during the concrete pouring phase of construction.

- **HMP Berwyn** is due to be fully operational by the end of 2017. With eventually 2106 inmates and 1000 staff this will significantly increase traffic into the area.
- **Pickhill Bridge Farm 4MW solar farm** (granted planning permission on 30th July 2015). It is anticipated there will be no regular traffic movements generated once the facility is operational therefore the combined impact with the Scheme will be negligible. However construction is likely to happen at the same time as the Power plant and it is estimated there will be 30 light vehicle movements (15 in & 15 out) a day and 20 HGV movements (10 in and 10 out) a day, during peak construction, likely to be via Bryn Lane.

The table below, from the ES illustrates the percentage impact of the proposed traffic changes, as a result of the 3 proposed developments;

Table 7.17: Transport and Access: Changes In Average Weekday Flows - Cumulative Impact Scenario

Link	2018 Base Traffic	Kingmoor Park North	The Prison	Solar Array	Electrical Connection	Electrical Connection Road Closure	Base + Total Cumulative Traffic	The Scheme	Cumulative % Increase
A534 (W)	22,232	100	125	42	73	4,314	26,885	575	24%
A534 (E)	8,768	0	49	8	23		8,849	175	3%
Industrial Estate Road (N)	16,463	100	174	50	96	4,314	21,197	750	33%
Bryn Lane (N)	4,385	100	-	50	8	-	4,543	750	21%
Bryn Lane (E)	3,364	-	-	50	8	-	3,422	750	24%

In addition the following applications have also been submitted for approval to the local authority but have not been taken into consideration in the impact assessment:

Blok Biomass Plant (P/2015/0615) application has been approved and is due for completion in May 2017. The plant will have a capacity of 5.4MW, and will be classed as 'CHP' ready (i.e. with ability to transfer heat). This will be located to the South of the proposed power station. Approximately 11 vehicles a day are expected during operation (including staff and wood deliveries). This does not take into consideration vehicles expected during construction.

FCC Environmental (P/2016/0368) – have applied for increased operational hours. Current hours are 7:30 to 18:00, Mon to Sat, and 10-16:00 on a Sunday and bank holidays. The application is for an extension of operating hours to 06:00- 22:00, 7 days a week. This may increase deliveries to this biological treatment site, but it is not clear by how much. *Application pending.*

Furthermore, we have concerns that the number of vehicles identified in the ES for transport and access to the prison appears underestimated.

We do not believe the traffic impact on Kellogg site access has been fully assessed during construction and operation. Not all planned developments have been considered in determining the cumulative traffic impacts on Bryn Lane (Biomass plant, FCC extended hours etc.), and we have concerns that the number of vehicles identified in the ES for transport and access to the prison are underestimated. We believe this could have significant implications on the assessment outcome in terms of Kellogg operations and the level and nature of the mitigation proposed.

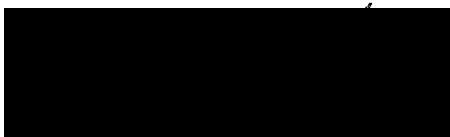
In addition, we are concerned that the absence of the other schemes from the cumulative assessment of transport, is likely to be replicated in other bits of the ES, and in particular could exacerbate our concerns in respect of the impact of air quality/dust. We believe this a potential critical failing in the methodology for the EA.

Catastrophic Events

With the exception of fire safety, no information has been provided on the potential for catastrophic events, and the mitigation measures in place to address this. Due to our very close proximity to the proposed development we would like to understand more about the potential for catastrophic failure and the mitigation measures in place to address. We would for example, expect to see the assessment of risk and appropriation mitigation measure, associated with terror attacks, gas explosion, gas leakage, fire etc.

I look forward to your response in dealing with this matter.

Yours Sincerely



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Karen Thomas
Plant Director

