

Millbrook Power Project Team
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AC/2017/126483/04-L01
Your ref: EN010068
Date: 16 April 2018

Dear Sir/Madam

**MILLBROOK POWER LIMITED: PROPOSED GAS FIRED POWER PLANT - THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION (EXA WQS)
ROOKERY SOUTH PIT, NR. MILLBROOK, BEDFORDSHIRE**

Thank you for your letter regarding the above mentioned site, which was received on 20 March 2018. Please find our response to your written questions below:

ExQ 1.7.2

Yes. We can agree to this way forward. Through effective liaison, we consider that the risk from basal heave can be mitigated.

ExQ 1.7.3

No. The Blisworth Limestone does have resource potential in other areas and is used for significant abstraction. Until a full site investigation has been undertaken, we consider that it is not possible to confidently make an assumption such as this. However, we consider that Requirement 8 (as set out below) satisfies the need for the additional investigations at this stage:

Contamination and groundwater

1.—(1) Each of numbered works 1 to 8 must not commence until, for that numbered work, a scheme (which may be included in the construction environment management plan) to deal with the contamination of any land, including groundwater, which is likely to cause significant harm to persons or significant pollution of controlled waters or the environment and ground conditions relevant to foundation design and ground stability has been submitted to and approved in writing by Central Bedfordshire Council.

(1) The scheme must include an investigation and assessment report, prepared by a specialist consultant approved by Central Bedfordshire Council, to include groundwater baseline monitoring and assessment and to identify the extent of any contamination and the remedial measures to be taken to render the land fit for its intended purpose, together with a management plan which sets out long-term measures with respect to any contaminants remaining on the site.

(2) The scheme must include an investigation and assessment report to identify ground conditions and ground stability matters and must identify appropriate foundation design measures.

(3) Remediation must be carried out in accordance with the approved scheme.

(4) Foundation design measures must be carried out in accordance with the approved scheme.

Environmental Permitting Regulations (EPR)

Please find below some additional information that we hope will assist your Authority in clarifying aspects relating to Environmental Permitting (England & Wales) Regulations (EPR):

We have commenced our assessment of the EPR application from the Applicant. This will focus on the operational aspects of this proposal. As part of the process, we have consulted with a number public bodies on the application, including the Local Authority and the Health & Safety Executive, as well as, hosting the information on a website for members of the public to comment on.

We provide clarification points on our environmental assessment below, where we feel it would assist your Authority but without compromising the independent assessment of the EPR Permit application. We will elaborate on our response on all environmental aspects within the Decision Document in our 'minded to' draft permit decision. A likely date for this has not been decided. But, it will be after 30 April 2018.

Recent changes in the electricity supply market have increased the requirement for combustion plant to operate at short notice and for short periods of time. Operating plant in this manner means that they must be able to synchronise with the grid very quickly and this is only feasible for certain types of plant or modes of operation. Such operation, is generally most attractive to older plant moving towards end of life operation as well as newer custom designed purpose built plant.

The Department of Energy & Climate Change (DECC), now the Department for Business, Energy & Industrial Strategy (BEIS), commissioned a study to examine whether there are additional Best Available Technique (BAT) considerations which should be applied when permitting such plant under EPR. Normally, permit conditions and emission limit values will not be applied that are more stringent than those set out in the BAT Conclusions Document (BATc) or those in the Industrial Emissions Directive (IED). However, where stricter conditions are required to protect environmental quality standards, these will be applied as required under Article 18 of the Industrial Emissions Directive.

A key requirement of EPR is that Air Quality Standards (AQS) must not be breached by permitted plant reflecting Article 18 of the IED. Emissions from some rapid start combustion plants can be high and dispersion modelling is required to show the impact on AQS from emissions. This may require, as appropriate, limitations on operating hours and potentially individual duration to ensure that AQS are met.

Our approach to permitting is to consider the worst case scenarios for any potential environmental impact from an installation permit application. This is one of the first

applications to go through the IED BATc permitting approach for a 1500hr balancing Open Cycle Gas Turbine, so at this stage we have no examples to share on what that permit would look like. However, we can confirm that our approach will be for permitting operating hours to be limited to 2,250 hours in any one year subject to a five year rolling average of 1,500 hours. This approach reflects our likely permit conditions that will apply to an Open Cycle Gas Turbine based on the IED BATc for Large Combustion Plant.

The permit application provides a worst case scenario of 2500 hours. The 2,250 worst case scenario in the planning application has been used for the selection of stack height. Our approach takes a very precautionary approach to air quality impact assessment. The Permit conditions will set out how operational hours should be calculated on an annual and five year rolling average basis following our own assessment of own environmental impact modelling which will take into account, all relevant factors, including: downwash from buildings; topography, critical loads on Sites of Special Scientific Interest (SSSI) / European Habitat Sites, and any nearby emissions such as those from the adjacent Energy from Waste plant.

We hope this provides your Authority with the clarification required. Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

Neville Benn
Principal Planning Advisor
Sustainable Places
Direct dial 0203 0251906
Direct e-mail neville.benn@environment-agency.gov.uk

