

Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS Final Submission on Air Quality
by Redmore Environmental**

Deadline 13 – 5 July 2021

by

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

Unique Ref. No. EA2: 2002 4496

Air Quality Representation: Final Deadline

Offshore Windfarms

East Anglia ONE North: PINS Ref: EN010077

East Anglia TWO: PINS Ref: EN020078

Client: SEAS

Reference: 4242-4r1

Date: 1st July 2021



Report Issue

Report Title: Air Quality Representation: Final Deadline - Offshore Windfarms Report

Reference: 4242-4

1	1 st July 2021	Jethro Redmore	-

Taylor Road, Manchester, M41 7JQ

info@red-env.co.uk | 0161 706 0075 | www.red-env.co.uk

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1.1.1 Redmore Environmental Ltd was commissioned by SEAS to comment on air quality impacts associated with the proposed East Anglia ONE North and East Anglia TWO Offshore Windfarms. Further to submission of the representations, the Examining Authorities issued written questions and requests for information (ExQs3) on 20th May 2021. This included the following for Natural England (NE) and East Suffolk Council (ESC) in relation to points previously raised by Redmore Environmental through written and oral evidence:

"Ammonia emissions on Leiston-Aldeburgh SSSI and Sandlings SPA

In the representation from SEAS [REP5-109] and at ISH 14 the issue of the impact of emissions, in particular ammonia, on Leiston-Aldeburgh SSSI and Sandlings SPA was raised by Mr Redmore. The Applicants responded to this in [REP6-032]. Having regard to these submissions, please comment on whether this matter has been properly assessed by the Applicants and what you consider the impacts on the habitats and species of the aforementioned SSSI and SPA would be as a result of vehicular and machinery emissions associated with the Proposed Developments."

1.1.2 The question was addressed by ESC in response to Deadline 11 on 11th June 2021. This indicates that ESC has concluded that ammonia (NH₃) emissions from road traffic and non-road mobile machinery (NRMM) would not have a significant impact on the Leiston Aldeburgh Site of Special Scientific Interest (SSSI) or Sandlings Special Protection Area (SPA). However, no actual assessment of the changes in pollution levels or the associated impact on habitats is provided. Indeed, the use of Euro VI vehicles, referenced as an air quality mitigation measure, is likely to increase NH₃ emissions as a result of emission slip from the nitrogen oxides (NO_x) control system, as previously outlined in Redmore Environmental written representation dated 29th January 2021. Without submission of any additional detailed analysis, it is not clear how ESC or the Examination Authority can be confident that significant air quality impacts will not occur at ecological receptors based on the evidence provided to date.

1.1.3 The question was also addressed by NE in response to Deadline 11 on 7th June 2021. This indicates that NE has not identified a significant impact pathway arising as a result of NH₃ emissions from vehicles/machinery. However, no justification for this statement or supporting analysis is provided. Again, it is therefore not clear how NE or the Examination Authority can be confident that significant air quality impacts will not occur at ecological receptors based on the evidence provided to date.

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1.1.4 Based on the above, we would therefore maintain our position that as no further assessment has been provided, we do not feel that the issues raised previously in relation to NH₃ emissions and associated impacts on ecological designations have been adequately addressed. As such, we maintain the same objection as previously identified.

