

Planning Inspectorate
National Infrastructure Planning
Temple Quay House (2 The Square)
Temple Quay
Bristol
BS1 6PN

Our ref: NA/2018/114039/02-L01
Your ref: EN010082
Date: 25 May 2018

Dear Sir/Madam

**APPLICATION BY SEMBCORP UTILITIES (UK) LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE TEES CCPP PROJECT. PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS AMENDED) – RULE 17
PROPOSED CHANGES TO THE ORIGINAL APPLICATION.**

Thank you for your letter in respect of the proposed changes to the above Development Consent Order (DCO) application, which we received on 8 May 2018.

The proposed changes to the original DCO application are:

- an increase in the maximum height of the turbine hall buildings from 25 metres ('m') to 32m; and
- an increase in the maximum height of the Heat Recovery Steam Generator (HRSG) buildings from 44m to 45m.

We have assessed the submitted information for the proposed changes and have the following comments to make.

Environment Agency Position

We consider that the proposed changes do not form a material change to the original DCO application.

We have based this reasoning on issues that fall within our remit to comment upon for the DCO application. Based upon the information submitted, we advise that we do not anticipate the proposed changes will generate a new or different



likely significant environmental effect than that already assessed within the original DCO application for the reasons outlined below.

Air Quality

According to Annex A of Implications of Requested Change on the EIA (IRCE), Doc Ref: 8.3, which replicates building height information from the Preliminary Environmental Impact Report (PEIR) and Environmental Statement (ES), the ES has already modelled environmental impacts using the proposed increased HRSG building height of 45m. Therefore, the applicant has provided environmental impact data for the proposed increase in HRSG height of 1m, and this data suggests there is no change in environmental impact as a result of an increase in the height of the HRSG building from 44m to 45m.

Annex A of IRCE shows that the ES has already modelled environmental impacts using a turbine hall building height of 31m. The Rule 17 DCO modification relates to a turbine hall increase from 25m to 32m. Based on the environmental impact information provided for the turbine hall building at 31m, it is reasonable to assume that the proposed 1m increase to the height of the turbine hall is unlikely to cause a significant change in environmental impact. Also, the turbine hall is located further from the stack than the taller HRSG and therefore should be less likely to cause downwash effects.

We note that the applicant has presented identical air model results in the PEIR and ES reports, as shown in Annex A of IRCE), for a turbine hall building height of 21.3m in the PEIR and subsequently 31m in the ES. Although, it is possible that the air model results could remain the same for the turbine hall building, there does not appear to be a detailed explanation for why this is the case within the IRCE. This will need to be explained within the DCO documents.

We cannot comment further on the environmental impact of the proposed increases in building heights without undertaking a detailed assessment of environmental impact, using the preferred contractor's stack heights, stack diameters, stack location, building locations and designs.

Noise

Altering the height of buildings has the potential to channel noise towards new sensitive receptors. During the determination of the Environmental Permit, an assessment of the preferred contractor's proposed noise abatement equipment, noise impact assessment and noise monitoring will be conducted. We are unable to provide further comments in respect of this matter at the DCO stage.

Air Emission Monitoring Platform

We note that the air emissions monitoring platforms on both stacks, have not been shown on the photomontages.



In order to demonstrate compliance with the Environmental Permit, the optimum position of the air emissions monitoring points and the air emissions monitoring platform is an integral part of the overall plant design to ensure the applicant can extract a representative sample of their emissions to air, for analysis. We would anticipate that these large platforms will be located approximately half way up each stack.

Guidance on the acceptable location of the air monitoring points and the monitoring platform design are held within Technical Guidance Note TGN M1 "Sampling Requirements for Stack Emissions Monitoring".

The proposed changes to the DCO application are to increase the height of the HSRG building and turbine hall building. However, the applicant's consultation leaflet does mention that the stacks leading from the gas turbines will be no more than 75m in height and that they will continue to work to see if they can be reduced further. It should be noted that if stack height is reduced, this may reduce air dispersion and therefore adversely affect their Environmental Impact Assessment.

In summary, we consider that the proposed changes do not represent a material change to the application. Notwithstanding this, we acknowledge that there may be other issues for example visual appearance and landscape issues, resulting from the proposed changes, which fall outside of our remit to comment upon but could constitute a material change.

If you have any questions in respect of the above, please do not hesitate to contact me.

Yours faithfully

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