

**Application by Cory Riverside Energy for an Order Granting Development Consent for the Riverside Energy Park.**

**Additional Written Questions**

**Q2.1.4 – Please will the London Borough of Havering comment on the Applicant’s assessment of the significance of the predicted impacts from air emissions, in particular Nickel and Chromium VI, at identified receptors in Rainham as set out in its response to the ExA’s first written questions [REP2-055]**

**London Borough of Havering response**

1. The London Borough of Havering (“the Council”) has reviewed the Applicant’s response to the Examining Authority (“ExA”) Written Question Q2.0.10, regarding the assessment of significance of impacts from Nickel emissions and would comment as follows:

1.1 The Applicant sets out in its response (2.10.2) the factors which should be taken into account to judge the level of significance of impacts. One of these factors is the number of properties with minor, moderate or major air quality effects and a judgement on the overall balance. The Applicant balances the number of properties that receive different levels of impact across the whole of the study area (2.10.3, 2.10.4). More specifically, the Applicant’s judgement that the Minor impacts can be considered not significant, is based on the fact that the majority of receptors in Rainham and in the wider study area receive negligible impacts.

1.2 As set out in the Council’s Local Impact Report, the Council does not agree with the Applicant’s judgement of significance of impacts above and with how the IAQM guidance has been applied. According to the IAQM guidance, the extent of current and future population exposure to the impacts should be taken into account to judge the level of significance of impacts. According to the same guidance, *‘the assessor will need to consider the approximate*

*number of people exposed to impacts in the various different categories of severity, in order to reach a conclusion on the significance of effect. An individual property exposed to a 'Moderate' adverse impact might not be considered a significant effect, but many hundreds of properties exposed to a 'Minor' adverse impact could be*. Taking into account the location and type (residential) of the modelled receptors, the Council considers that hundreds of residential properties will be exposed to Minor impacts from Nickel emissions, and therefore, the extent of population exposure to these impacts is sufficiently high, to assess the impacts as significant.

2. With regard to the impacts from Chromium VI emissions, the Council would comments as follows:

2.1 The Applicant has described the degree of impacts as Negligible, based on the fact that the incremental change in Chromium VI concentrations as a result of the proposed development is less than 0.5%. Based on this description, the Applicant has assessed the impacts from Chromium VI concentrations as not significant.

2.2 While the above description of impacts is in accordance with the suggested framework for describing the impacts set out in the IAQM guidance, the guidance states that *'It is unwise to ascribe too much accuracy to incremental changes or background concentrations, and this is especially important when total concentrations are close to the Air Quality Assessment Level (AQAL)'*. According to the same guidance, *'As the exposure approaches and exceeds the AQAL, the degree of harm increases. This change naturally becomes more important when the result is an exposure that is approximately equal to, or greater than the AQAL'*.

2.3 Taking into account that the predicted range of change in Chromium VI concentrations is 0.32 to 0.36% as well as the inherent uncertainty associated with these predictions, the Council considers that the likelihood of an incremental change of greater than 0.5% cannot be ruled out. Taking also into consideration the fact that a high number of human health sensitive receptors are exposed to Chromium VI concentrations which already

significantly exceed the AQAL (over 160% of the AQAL), the Council assesses the impacts from Chromium VI emissions as potentially significant.

**London Borough of Havering**

16<sup>th</sup> August 2019