

Our ref: AC/2023/131481

Your ref: EN010110 **Date:** 24 March 2023

Medworth EfW - Examining Authority Questions 1

AIR QUALITY AND HUMAN HEALTH		EA ANSWER
AQHH.1.1	Para 8.4.3 of Chapter 8 of the ES [APP-035] states that the spatial extent of the Study Area has been informed by the guidance detailed in Section 8.3 of the same document. As the EfW CHP Facility incorporates a combustion activity with a thermal input exceeding 50MW, in accordance with the Environment Agency's Air Emissions Risk Assessment for an Environmental Permit (EP), the assessment is required to consider nature conservation sites up to 15km from the emission source. Consequently, the Study Area includes an area encompassing 15km from the location of the chimney emissions. Could the EA confirm that it is satisfied with this approach and why it believes that a 15km radius is appropriate for this project?	Guidance 'Air emissions risk assessment for your environmental permit' sets the screening distance for 'Larger combustion plants using more sulphurous fuels with more than 50 megawatt thermal input' as 15km for SACs, SPAs, Ramsar and SSSIs.
AQHH.1.2	Table 8B3.6 of Appendix 8A: Stakeholder engagement and consultation comment on Air Quality [APP-078] includes the air quality monitoring results for 2021 of identified sites in the vicinity of the Proposed Development. The percentage of data capture varies considerably from site to site.	As part of the determination process will we check background levels provided against Department for Environment food & rural affairs background mapping data for local authorities. https://uk-air.defra.gov.uk/data/laqm-background-home

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	How can the Applicant the confident that the data captured is representative of all sites? Does the EA have any comments to make on the date included here?	
AQHH.1.3	Table 8B3.10 of Appendix 8A: Stakeholder engagement and consultation comment on Air Quality [APP-078] refers to where baseline information from a number of pollutants and metals has been derived. Does the Environment Agency agree with the sources included? If not, why not?	As part of the determination process wewill check background levels provided against Department for Environment food & rural affairs background mapping data for local authorities. https://uk-air.defra.gov.uk/data/lagm-background-home
AQHH.1.12	Cambs CC and Fenland DC RR states in para. 5.37 the Outline OMP should be submitted for approval by the relevant consultees, including but not necessarily limited to FDC, prior to the operation of the installation on the site granted permission. The Environment Agency is requested to comment on this issue in relation to the content of such a document and it's view on the current draft OMP.	The EA undertakes consultation in line with guidance "Environmental permits: when and how we consult". As part of the determination we will assess the odour management plan against our relevant guidance 'H4 Odour Management - how to comply with your environmental permit' to ensure it meet the requirements. Any odour management plan would form part of the permits operating techniques, with permit conditions set to address any issues raised.
AQHH.1.15	The Applicant has determined that there will be no likely significant air quality effects so no monitoring is required for significant effects. However the Applicant would be required to monitor emissions under its Environmental Permit. Can the Applicant confirm if the Environmental Permit will contain a requirement for monitoring levels of heavy metals and will it require the inclusion of actions if monitoring identifies levels which exceed permitted levels? Does the EA have any comments to make on such a requirement?	Permit emission limit values at set in line with Best available techniques for waste incineration. This would include limits for heavy metals.
ENVIRONMENTAL IMPACT ASSESSMENT		EA ANSWER

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EIA.1.2	The ES is reliant in numerous aspect chapters on the proposed Environmental Permits (EP) for the delivery of the Proposed Development. The EPs have not yet been agreed withthe EA. The existing permits have also not been submitted to the Examination at present. Please can an update be provided as to the stage of the Environmental Permits.	As at the 24/3/2023 the application is currently being assessed for 'duly making'. This process checks that all relevant documents are in place prior to determination.
EIA.1.5	The base configuration was a chimney 3m above the level of the tallest building, this being the minimum requirement of the EA's D1 guidance note. Therefore the assessment parameters ranged between 53m – 150m. The worst case scenario height is considered to be 84m and the limit of deviation is a height of up to 90m. Taking in to account the EA's guidance, the chimney height which has been identified as corresponding to best Available Techniques (BAT) and has been used to model impact of chimney emissions in this assessment is 84m (this is considered a worst case scenario recognising that the Applicant's vertical Limits of Deviation (LoD) includes for chimneys up to 90m in height). Can the Applicant explain why 84m was considered to the worst case scenario, both in terms of visual impact and emissions?	The modelling process used to determine stack height will be assessed as part of the permit determination.
BIODIVERSITY, ECOLOGY AND THE NATURAL ENVIRONMENT		EA ANSWER
BIO.1.3	Can the NE and the EA confirm they are satisfied with the conclusions and the methodology used in the No Significant Effects Report (NSER)?	We defer to Natural England on this matter.

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