

Date: 20 October 2023
Our ref: 402960
Your ref: EN010116



BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

NorthLincolnshireGreenEnergyProject@planninginspectorate.gov.uk

T 0300 060 3900

Dear Sir/Madam

NSIP Reference Name / Code: EN010116 North Lincolnshire Green Energy Park

Please see Natural England's response to Secretary of State Consultation 1 (email dated 22 September 2023) for North Lincolnshire Green Energy Park NSIP below.

6.3 NE is requested to provide further information as to why it is content [REP8-036] that the ROC modelling parameters are an acceptable basis for the assessment and identification of effects from operational emissions to air.

Natural England advises that, while we note operating parameters (such as operating hours) are not proposed to be secured in the DCO, we are satisfied that the DCO does secure the ERF technology, the use of which has been used to inform the modelling. We are also satisfied that an environmental permit will be required for the development, which will also require a Habitats Regulations Assessment (HRA) to be undertaken along with an assessment of impacts to SSSIs, and which will be able to set these conditions. We are satisfied that the modelling has been undertaken using the best available information to demonstrate no AEOL, with the potential impacts under the ROC being considered alongside the initial identification of potential for impacts in the worst case scenario. When only the information on the worst-case emissions scenario was provided, there wasn't sufficient evidence to conclude a scenario existed where there would be no AEOL, and relying on this only being demonstrated at a later date for the permit would have been inappropriate. The information included within the HRA submitted for this DCO should also be considered in the environmental permit HRA as they are for the same project.

The scenario which informed the ROC was detailed in appendix A of the HRA, with an explanation from the developer on why those parameters were chosen. It is explained in table 2.1 that the operating hours used in the modelling now account for 'down time and maintenance' and it is reasonable to determine that during these periods point emissions wouldn't arise from the development. It is also stated that the new emission values have been based on Environment Agency annual ERF performance data. We are satisfied that there was still a reasonable degree of precaution in the modelling as it is stated that usage of reagents and production of residues is still based on a worst case, and there were also no changes made to emissions modelling for the back-up generator and ERF boilers. It is also stated that worst case meteorological data have also been used.

Pollution from traffic was also adjusted in the ROC scenario as the developer explained that the access road which was previously located adjacent to the River Trent (within 200m of Humber Estuary SAC/Ramsar and SSSI) would be moved, and therefore would be located more than 200m

from the designated site. Based on this distance Natural England wouldn't anticipate air quality impacts from traffic on the designated site on this section of the Humber Estuary designated sites.

Yours faithfully

Lisa Sheldon
Yorkshire and Northern Lincolnshire Area Team
Natural England

Email: [REDACTED]