

Enviroparks Hirwaun Submission of further environmental and supporting information

Enviroparks (Hirwaun) Limited ♦ May 2009

INTRODUCTION

Enviroparks (Hirwaun) Limited (EHL) submitted a planning application to Rhondda Cynon Taf County Borough Council (RCT) and the Brecon Beacons National Park Authority (BBNPA) in November 2008 for an integrated energy and resource recovery facility on land at the Hirwaun Industrial Estate.

The planning application site straddles the boundary between the two authorities. EHL's planning application is identified by registration numbers 08/1735/10 (RCT) and 08/02488/FUL (BBNPA). Documentation submitted with the application included an Environmental Statement (ES) which comprises a main ES document, appendices and a separate non-technical summary, along with a Design and Access Statement and a Planning Policy Statement.

Consultations with the local authorities, statutory agencies and the local community were undertaken prior to submission and have continued throughout the post-submission period. Discussions and meetings with the councils and statutory consultees have been undertaken in order to clarify queries on the detail of the proposed scheme and its predicted environmental effects.

The Enviroparks proposal is the subject of holding objections received from the Countryside Council for Wales (CCW), the Environment Agency Wales (EAW) and Welsh Water (WW).

CCW set out its concerns in a letter dated 20 January 2009. These related to the possible adverse impacts of the proposed development on the features of the European designated sites within a 15 km radius of the site. Particular concerns were raised in relation to the potential for air emissions to cause pollution to Special Areas of Conservation (SAC), and the potential for hydrological changes at the site and any resulting impact on the nearby SACs. CCW recommended that an Appropriate Assessment be undertaken to consider the potential impacts of these issues on the local SACs.

In a letter dated 12 February 2009, the EAW objected to the Enviroparks proposal on the basis that it could have an adverse impact on nature conservation. The Agency also expressed concern about the adequacy of the information that had been provided on the potential for land contamination at the site, and the potential effects that this could have on controlled waters.

Water is stored in the Penderyn reservoir and used by Welsh Water to supply drinking water to the locality via a local treatment works and its associated infrastructure. Early in January 2009, in a response to consultation by BBNPA, Welsh Water has expressed concerns regarding the potential for the airborne releases from the EHL proposal to affect water quality in the reservoir.

In response, the following additional information is presented in this folder in order to assist the environmental impact assessment of the proposals, inform an Appropriate Assessment under the Habitat Regulations 1994, and to provide clarification on a few points of planning interest.

The additional information provided is as follows.

Tab 1. FURTHER ENVIRONMENTAL INFORMATION

This section contains three documents – additional information on air quality and hydrology prepared by environmental consultant Envisage, an interpretative report on site investigations prepared by Soil Mechanics, and a brief explanatory note prepared by Enertech, providing a non-technical explanation of engine operation and releases to air, levels of background pollutants, and illustrative analogies for the quantity of emissions assessed.

The Envisage report employs a methodology discussed with CCW and EAW to identify the effects of aerial emissions on designated nature conservation sites in the locality. It draws the following conclusions.

- The predicted environmental concentration of aerial emissions from the proposed development, taking into account the background air quality concentration as well as the process contribution to air quality, is not considered to be of significant concern, either to human health or to vegetation, although not all substances can be screened as ‘insignificant’ by definition.
- Although the 1 % threshold of insignificance can be seen to be exceeded for nutrient nitrogen and acid deposition at Blaen Cynon and for acid deposition at Bryncarnau Grasslands Llwyncoed, the contribution of the process to such deposition at both sites is considered to be a minor proportion of the total and thus is not considered to have any significant overall impact.
- Envisage also considered the in-combination effects of currently identified potential local developments and increases in traffic emissions. Neither of these elements has any significant effect.
- No additional abatement measures are proposed for emissions to air from the Enviroparks development.
- The proposed Enviroparks development at Hirwaun does not intend to alter the hydrology of the area. Once construction works are complete, during which foundations, excavated areas, below ground rooms and drainage and utility runs will be laid, there will be no on-going impact on the hydrology of the area. The company does not propose to abstract ground water for use and will not require excavation to any significant depth. Therefore there will be no significant impact on ground or surface water features in the area.

The Soil Mechanics report contains detailed borehole and trial pit data for the planning application site itself.

The Enertech briefing note explains why monitoring and control of potential pollutants on site to prevent harm is preferred to end-of-process abatement with monitoring beyond the site to look for the absence of harm. Enviroparks intends to achieve acceptable exhaust emission releases by a combination of fuel quality control and engine management.

Tab 2. APPROPRIATE ASSESSMENT: STAGE 1 SCREENING and ASSESSMENT FOR SSSIs WITHIN A 10 km RADIUS OF THE SITE

CCW recommended that the Enviroparks proposals should be the subject of an Appropriate Assessment by the local planning authorities under the Habitat Regulations 1994. Appropriate Assessment is undertaken in order to identify likely effects on designated *Natura 2000* nature conservation sites – in the current context, local Special Areas of Conservation.

To inform this process, Section 2 of this folder contains an Appropriate Assessment Stage I Screening Report prepared by Middlemarch Environmental Limited. This report concludes that the proposed development is not likely to give rise to significant environmental effects on the integrity of any *Natura 2000* sites. This conclusion has regard to the nature of the proposals, including proposed air pollution control measures included in the project design.

Section 2 also contains a similar assessment for Sites of Special Scientific Interest (SSSI) within 10 km of the site. Similar conclusions are reached.

Tab 3. RISK ASSESSMENT FOR THE PENDERYN RESERVOIR

At the request of Welsh Water, Enviroparks has completed a risk assessment concerning the effects of emissions on water quality, employing the water company's preferred proforma. This concludes that the project's compliance established air quality objectives ensures that the majority of releases are incapable putting at risk the quality of the water, whether within or transferred from the Penderyn reservoir system. Monitoring systems are proposed to ensure that water quality would not be compromised by the emission of specific identified substances.

**Tab 4. HEALTH RISK ASSESSMENT
DIOXIN HEALTH RISK ASSESSMENT**

Enviroparks has commissioned two health impact assessment reports, one for general combustion gases and another specific to dioxins. These are provided as supporting information to the planning application.

The Health Risk Assessment considers the potential risk to residents living in the vicinity of the proposed EHL development associated with exposure to pollutants in emissions from the reciprocating engines. Pollutants for which there are statutory objectives and limit values for the protection of health, such as nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and particulates (PM₁₀) were examined, as well as other pollutants for which there are regulatory limits specified for the operation of the process.

The overall conclusion of the health risk assessment is that the magnitude of potential health effects associated with exposure to pollutants released is likely to be insignificant at locations where members of the general public are likely to be exposed for extended periods of time. This indicates that the risk to health of the local population due to exposure to pollutants in emissions from the proposed Enviroparks development is likely to be very low.

Tab 5. WASTE RESOURCE REPORT *and* REPORT ON REGIONAL WASTE FACILITIES

RCTCBC asked EHL to provide further detail of the relationship between the proposed development and likely waste sources, having regard to the proximity principle for waste planning and the regional strategy for waste as set out in the South East Wales Regional Waste Plan first review (RWP). The first paper presented in Tab 5 is EHL's response.

BBNPA has queried whether the proposed development constitutes a 'regional waste facility'. In response, the second paper in Tab 5 clarifies the detail of the relationship between the proposed development and planning policy on the development of regional waste facilities as may be set out by national policy, BBNPA's development plan and the South East Wales Regional Waste Plan.

Tab 6. ROAD SAFETY AUDIT

A Stage 1 Road Safety Audit has been undertaken for the submitted scheme by Capita Symonds. This is reproduced in section 6. The proposals were found to be generally compliant with established design and safety standards. In response to specific recommendations, a revised site plan (ref. 8016 PL 003 rev.G) is supplied in section 8 of this submission.

The revised layout includes the following refinements.

- A pedestrian island has been added to the centre of the site access road off Fifth Avenue to provide a refuge between the footway.
- The footway has been extended to the north of the site entrance at Ninth Avenue.
- Minimum visibility splays to suit the site speed limit have been provided that should remain clear of obstructions.
- The coach bay has been extended with an entry taper to enable safer movements to be completed.

Tab 7. BREEAM INITIAL GUIDANCE ASSESSMENT

In addition to being a resource recovery and energy production park, the Enviroparks scheme has sought to incorporate various sustainable elements in the design of buildings.

An Initial BREEAM Guidance Assessment has been prepared for the Visitor Centre building (1), Gatehouse building (2), Fuel Preparation Area (3), the Engine House Unit (4), and the Biomax Unit (5), based on the provisional design. The purpose of the assessment is to ensure that flexible, energy efficient, easily maintainable and environmentally friendly buildings are provided.

Based on the current proposed design, the assessments found that the buildings listed above would provisionally achieve an 'Excellent' BREEAM rating. EHL intends this to be a demonstration scheme that will promote the EHL's approach to sustainable resource recovery.

Tab 8. DRAWINGS: 003 PROPOSED SITE PLAN REV G, 090 GREEN WALL DETAILS

As described in the context of section 6 (above), the proposed site plan has been revised to incorporate improvements suggested during post-submission consultation and in response to the road safety audit. In addition, the boundary between RCTCBC and BBNPA has been added, represented by an indicative line on the plan.

Comments by RCTCBC urban design included a request for EHL to provide details of the green wall that forms a visual screen around the south and western perimeter of the plasma process unit. This is shown on a new drawing, 8016 PL 090, along with typical examples of stone gabions, such as those that are now shown framing the main entrance to the site off Ninth Avenue.

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