

1 Introduction

Energion have submitted a planning application for the installation of a 40 mW peaking gas plant on land off Felindre Road, Pencoed. As part of the pre-application consultation (DNS/3228009) Natural Resources Wales (NWR) have made the following response¹ in relation to air quality:

'We welcome the submission of the document entitled 'Air Quality Assessment: Energion Felindre Road, Pencoed (Project Ref: AQ051643), dated 15 May 2019, by Kairus Ltd.

We note that Table 4.2 of the above document has identified that there are two Special Areas of Conservation (SAC's) located within 10 km of the proposed development site, along with two Sites of Special Scientific Interest (SSSI's), within 2 km of the site.

As part of the above assessment, the following information has been provided in relation to the four protected sites:

- *Table 8.1 (Maximum Predicted Annual NO_x Concentrations at Sensitive Habitat Receptors),*
- *Table 8.2 (Maximum Predicted 24-hour NO_x Concentrations at Sensitive Habitat Receptors),*
- *Table 8.3 (Predicted Nutrient Nitrogen Deposition at Sensitive Habitat Receptors); and*
- *Table 8.4 (Predicted Nitrogen Acid Deposition at Sensitive Habitat Receptors).*

These results indicate that the concentrations and depositions from this proposal are all below the screening threshold for annual & daily critical levels, nutrient nitrogen and acid critical loads.

However, recent case law indicates that although a development's process contributions may be not significant alone, an in-combination assessment will be required under the Habitats Regulations.

Therefore, we advise that the in-combination assessment is provided as part of the DNS submission'.

To assess the in-combination effects of the proposed development at the identified habitat sites a review of approved planning applications has been carried out to identified any within 10 km of the two SAC's and 2 km of the two SSSI's that may have a significant impact on local air quality. Emissions from these sites have been considered in-combination with the emissions from the proposed peaking gas plan.

The results of this review are set out below.

2 Methodology

To identify any relevant installations which may result in significant emissions to air within the vicinity of the identified designated habitat sites a review of planning applications held within the planning portals of Bridgend County Borough Council (BCBC), Neath Port Talbot Council (NPTC), Rhondda Cynon Taf County Borough Council (RCTCBC) and Vale of Glamorgan Council (VGC). Those

¹ NRW, Letter dated 10 July 2019, Ref: CAS-88680-J3X7

of significance in terms of potential emissions to air have been identified within 10 km of the two SAC's (Blackmill Woodland SAC and Glaswell Tiroedd SAC) and within 2 km of the two SSSI's (Coed Y Mwstwr Woodland SSSI and Bryanna a Wren Tarw SSSI).

Where a potential significant installation has been identified, details of the development have been reviewed to identified whether emissions from the site would be significant at the identified habitat sites, alone and in-combination with the proposed peaking gas facility.

3 In-combination Impacts on Air Quality

The installations of relevant identified during the review of planning applications are set out in Table 1 below.

Designated Site	Identified Installation/Planning Application					
	Application Number	Location	Distance from Designated Site	Development Description	Source Information	Significant Impact
Coed Y Mwstwr Woodland SSSI	No significant installations or planning applications identified within 2 km					
Bryanna a Wren Tarw SSSI	P/04/1543/FUL	Rockwool Pencoed CF35 6NY	0.5 km	No documents available	Permission granted in 2005 therefore assumed development installed/completed and therefore any emissions are already accounted for in background data	No
Glaswell Tiroedd SAC	P/04/1543/FUL	Rockwool Pencoed CF35 6NY	8 km	No documents available	Permission granted in 2005 therefore assumed development installed/completed and therefore any emissions are already accounted for in background data	No
	P/10/473/FUL	HMP & Yoi Parc, Hoel	4.2 km	New generator	to be installed as backup system so would only operate	no

		Hopcyn John, CF35 6AP			in the event of a power failure at prison therefore no emissions on a day to day basis. No issues raised by Public Protection in relation to emissions and impact on air quality	
	P/18/663/FUL	Land at former RAF Facility Mont Pleasant Road, Stormy Down	3.7 km	Biomethane gas to grid facility to use gas from adjacent anaerobic digestion facility	planning statement considers impacts on air quality and odour and concludes that gas to grid infrastructure is odourless and would not result in significant emissions to air. The LA confirm they do not consider this process to have a significant impact on local air quality.	no
	P/07/1464/FUL	Land at Abergarw Trading Estate	0.8 km	Manufacture and repair of Metal Bailing Machines	approval was granted in April 2008, therefore expected to have been built and therefore any emissions accounted for in background. No specific sources of emissions identified or issues raised during planning	no
	P/14/700/FUL	Stormy Down	3 km	Anaerobic Digester	The scheme has already been built and therefore emissions from the plant will be accounted for in background data,	no

					however, an AQ assessment undertaken as part of planning application shows no significant impacts at this location as a result of emissions from the site	
Blackmill Woodlands SAC	P/04/1543/FUL	Rockwool Pencoed CF35 6NY	8 km	No documents available	Permission granted in 2005 therefore assumed development installed/completed and therefore any emissions are already accounted for in background data	No
	P/10/473/FUL	HMP & Yoi Parc, Hoel Hopcyn John, CF35 6AP	2.9 km	New generator	to be installed as backup system so would only operate in the event of a power failure at prison therefore no emissions on a day to day basis. No issues raised by Public Protection in relation to emissions and impact on air quality	no
	P/18/663/FUL	Land at former RAF Facility Mont Pleasant Road, Stormy Down	3.7 km	Biomethane gas to grid facility to use gas from adjacent anaerobic digestion facility	planning statement considers impacts on air quality and odour and concludes that gas to grid infrastructure is odourless and would not result in significant emissions to air. The LA confirm they do not consider this	no

					process to have a significant impact on local air quality.	
	P/07/1464/FUL	Land at Abergarw Trading Estate	0.8 km	Manufacture and repair of Metal Bailing Machines	approval was granted in April 2008, therefore expected to have been built and therefore any emissions accounted for in background. No specific sources of emissions identified or issues raised during planning	no
	P/14/700/FUL	Stormy Down	3 km	Anaerobic Digester	The scheme has already been built and therefore emissions from the plant will be accounted for in background data, however, an AQ assessment undertaken as part of planning application shows no significant impacts at this location as a result of emissions from the site	no

4 Conclusion

A review of planning applications held on the planning register for BCBC, NPTC, RCTCBC and VGC has been reviewed to identify any planning applications within 2 km of the identified SSSI's and 10 km of the identified SACs that may result in significant emissions to air and therefore may result in in-combination effects when considered with the proposed installation at Felindre Road, Pencoed.

The review identified a number of developments, however a review of potential emissions concluded that there would be no significant impacts at the identified designated sites, therefore the in-combination impacts would be negligible.