

RESIDENTS AGAINST THE CF3 INCINERATOR
AN ADDENDUM TO
THE MOR HAFREN AIR QUALITY ASSESSMENT RESPONSE

INTRODUCTION

This document is an addendum to our initial response to the applicant's Air Quality Assessment document, which supports their planning application (DNS/3236340) for an incinerator at Newlands Road, Cardiff.

POTENTIAL IMPACT OF THE NEARBY WIND TURBINE AT G24 INNOVATIONS LTD.

The applicant's Air Quality Assessment states at paragraph 8.1, page 42:

"A GE Energy 2.5 MWe wind turbine is located at the G24 Innovations Ltd site, approximately 300 metres to the south of the ERF, this section addresses the potential impact of the wind turbine on dispersion of emissions from the chimney of the ERF"

This is incorrect.

Planning permission was granted in January 2008 for planning application 07/02286/E, which proposed a GE 2.5Mw wind turbine.

The wind turbine technology was amended, from a GE 2.5Mw to a **Vestas V90 2.0 Mw wind turbine** in Sept 2009. The amended noise impact assessments are included with the planning application documents.

However, we note that the Windpower web site (https://www.thewindpower.net/windfarm_en_16302_g24i.php) shows an **Enercon E82/2300 wind turbine** installed at the G24 Innovations site. We note the developer mentioned on this web page is Ecotricity, who submitted the original planning application.

We are confused as to which actual wind turbine technology is installed. We are of the opinion it is not the specific wind turbine technology used in the applicant's model of the effects of the wind turbine on dispersion of emissions from the ERF chimney.

We note and comment that the applicant's Air Quality assessment model of the potential impact of the nearby wind turbine at G24 Innovations lacks credibility as it is modelled on a different wind turbine technology.

We request that the wind turbine technology modelled is the specific model of wind turbine installed at G24 Innovations Ltd.

PARTICULATES (PM10 & PM2.5)

The applicant states at paragraph 8.1:

"The results from the modelling of wind turbine effects are summarised in the following tables, and refer to Nitrogen Dioxide which is the most significant of the emissions from the Môr Hafren Bio Power ERF"

We do not understand why the modelling of the wind turbine effects does not consider all sources of pollution and omits to consider Particulate matter (PM10 & PM2.5) emissions.

We note and comment that the applicant's Air Quality assessment lacks credibility and robustness by not considering all sources of pollution when modelling the wind turbine effects.

We request that all sources of pollution are included in the modelling of the wind turbine effects.

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RECEPTORS

The applicant states at paragraph 8.1:

“The results from the assessment indicate that there is no difference between the model predictions for the emissions scenario at Receptor No. 3 with and without potential wind turbine effects, and only a small, insignificant effect at the location of the maximum Process Contribution across the modelled grid”.

We are concerned that **only receptor 3** appears to have been considered, whereas the assessment has **23 specific receptors in the model**.

We understand that **the predominant wind direction in Cardiff East is from a westerly direction**.

We observe that **Receptor 3 is located to the north/north west** of the proposed ERF.

We note and comment that results from receptors that are close to residential areas and schools, or relevant to the predominant wind direction, are not included in the applicant’s modelling of the wind turbine effects.

CONCLUSION

We comment that the applicant’s Air Quality assessment and modelling of the wind turbine effects lacks credibility and robustness.

We therefore request that the applicant addresses these concerns and presents an Air Quality assessment of the wind turbine effects, which is truly representative and identifies all the impacts of the proposed operation of the ERF and wind turbine, prior to determination of the application.