

The Natural Resources Body for Wales Statement for Hearing Session 2: Effects on sensitive human receptor locations (construction and operational phases)

Wednesday 24 March 2021 10.00am

Bwriad / Proposal: Proposed construction and operation of an energy recovery facility, including the formation of a new access on to Newlands Road and ancillary infrastructure.

Lleoliad / Location: Land off Newlands Road, Cardiff, CF3 2EU.

Eich cyf/Your ref: DNS/3236340

1. Air quality and odours (including cumulative impacts)

ii. What is NRW's position concerning the respective remits of the Environmental Permitting and planning regimes in considering impacts on human health arising from emissions to air from the development?

The Planning Application

The impacts on human health from the proposal is likely to be a material planning consideration. To this extent, it's been scoped into the ES and a Health Impact Assessment has been submitted. However, it is important to note that NRW, in our statutory planning role, will not consider or advise on impacts to human health. We are not the appropriate body to advise the planning authority on this matter. The planning authority may consult other expert bodies for advice, such as Public Health Wales.

In terms of human health impacts from aerial emissions, we have completed two high level reviews of the air quality modelling methodology, mindful of our future role as the permitting authority. These reviews have found the modelling methodology appropriate and we deem it fit to inform a planning decision. However, it is important to note our review of the modelling methodology does not extend to a review and verification of the modelling results (see next question). This will come at a later date, when NRW Permitting Service assesses the applicant's environmental permit application.

You should be aware that we have considered the results, at face value, reported in the AQA, to provide advice on nature conservation matters only, given our statutory planning role.

The Future Permit Application

In our role as the permitting authority, if an environmental permit is submitted, we will thoroughly assess the impacts and predicted effects on human health and nature conservation (the environment) from the proposed installation. Our statement for Hearing session 4 provides further guidance on how we do this.

For an application of this type, we would normally consult on the application with the Local Health Board via Public Health Wales and the Food Standards Agency, amongst other external organisations. For a full list of consultation bodies, please see our [Public Participation Statement](#).

In order to assess potential impact on human health, we examine the applicant's air quality modelling against relevant environmental quality standards (EQS) for each pollutant that may be released. These are set out in on the GOV.uk webpage: [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#).

As can be seen from the gov.uk link, EQSs for air are set both for the protection of human health and vegetation and ecosystem receptors. EQS's can also be long term (annual emissions) or short term (e.g. 24 hours). We assess both as part of the permit determination process.

We will check that the predicted Process Contribution (PC) used by the applicant is in line with emission benchmarks for the type of process set out in legislation (IED, Annex VI) and/or sector guidance (e.g. European BAT Conclusions for Waste Incineration) - whichever is the tighter. For new plants, if these emission benchmarks cannot be achieved, we will not grant a permit.

We also expect the technology proposed by the applicant to match the technologies cited as being BAT in the Waste Incineration BAT Conclusions, as the design and technology is also key towards ensuring emissions are minimised as far as possible. This is another aspect which is assessed as part of the determination process.

iii. Is NRW satisfied that the revised air quality modelling and results/conclusions now provided are sufficient and reliable for the purpose of considering whether planning permission should be granted?

We have undertaken a second high-level review of the modelling procedure detailed in the revised Atmospheric Dispersion Modelling report (DOC 35). This review by NRW's Air Quality Modelling and Risk Assessment Team focused solely on the methodology used in the assessment. We have not audited the actual modelling files and therefore cannot verify the presented results/findings.

Only when further details of modelling and technology is provided as part of an Environmental Permit application, will the NRW Permitting Service be in a position to verify in detail the modelled outputs.

However, at this point, we advise the modelling is deemed appropriate and fit to inform the planning determination.