

Our Ref: VA/RJH

24 June 2016

Dr B C Gale
Clerk to Hartlebury Parish Council
20 Blakebrook
KIDDERMINSTER
Worcs
DY11 6AP

Dear Dr Gale

Air Quality in Hartlebury

Thank you for letter dated 9 June 2016 regarding air quality in Hartlebury. I have once again taken technical advice from colleagues at Worcestershire Regulatory Services (WRS).

The role of the Local Authority in this process was outlined at a meeting between Worcestershire Regulatory Services (WRS) representatives and the Parish Council in April 2015. To reiterate, the Air Quality Assessment (AQA) was reviewed and accepted as part of the planning application process, and the assessment cannot be re-examined under the planning regime following determination of the application process.

Under the Local Air Quality Management (LAQM) regime, Wychavon District Council (WDC) is required to carry out reviews and assessments of local air quality in their area, and where this indicates exceedances of national air quality objectives (AQO), declare an Air Quality Management Area and produce an Air Quality Action Plan.

Previous reviews and assessments indicate there are no exceedances of air quality objectives in Hartlebury and, therefore, there is no requirement to undertake any further action under the LAQM regime. Having considered your comments, I can confirm this position remains unchanged, and the rationale for this is set out below.

With respect to your comments on the AQA in your letter, I would draw your attention to the actual wording within section 7.1.2 of the report. In summary, this section outlines the following:

- The reasons *the adjacent brickworks would contribute higher emissions than the EfW facility* are due to height of the stack and subsequent reduced dispersal of emissions.

- For the main air pollutant of concern, nitrogen dioxide, produced by the Energy from Waste plant (EfW) NETCEN data was *not* used in the model and a significantly more conservative background concentration of 27.7 $\mu\text{g}/\text{m}^3$ (compared to NETCEN 15.37 $\mu\text{g}/\text{m}^3$) was used in the modelling for the AQA, as discussed in previous correspondence, Feb 2016. This is very likely to overstate the background concentration in the area, as it is almost *double* the national predictions (NETCEN), and note additionally does not include emissions from any local point sources.
- When the combined contribution of relevant sources are added to conservative background concentration, no breaches of air quality objectives are predicted.

It is acknowledged that the AQA appears to have confusingly labelled the brickworks utilised within the modelling, and that a more distant brickworks has not been included within the model. However, as you acknowledge in your letter, this second brickworks stack is sited over 1km away from the site of the EfW and, although not specified in available information, it is considered likely this was reasonably omitted from the AQA as it is outside of the area of sources that was subject to the specific assessment.

To accurately determine the impact from this distant stack, detailed dispersion modelling would be required considering the specific stack location, height and diameter and other parameters. However, due to the relative distance between these sources it is considered likely that the impacts of this second stack will 'fallout' in a different location and it is highly unlikely to affect all of the same sensitive receptors considered within the AQA.

However, following the suggestion in your letter, assuming the impact from the distant brickworks was the same as the adjacent brickworks modelled, which is considered a worse case scenario, that approach would add an additional 3.2 $\mu\text{g}/\text{m}^3$ and 14.05 $\mu\text{g}/\text{m}^3$ maximum, as detailed within Table 7.2 of the AQA, against the long term and short term air quality objectives for nitrogen dioxide respectively. The predicted long term concentration would increase to a total 34.1 $\mu\text{g}/\text{m}^3$, which is below the AQO of 40 $\mu\text{g}/\text{m}^3$, and the predicted short term concentration would increase to 83.4 $\mu\text{g}/\text{m}^3$, which is well below the AQO of 200 $\mu\text{g}/\text{m}^3$.

Given the conservative background concentration utilised in the original modelling and the unlikelihood of this worse case scenario being representative of actual conditions, WRS consider the above figures to be significantly overestimating total emissions of nitrogen dioxide in Hartlebury. Furthermore, you will note, even considering this unlikely worse case scenario there is no evidence or indication that there are any exceedances of AQO in Hartlebury. Therefore, in conclusion, as the available evidence indicates there is no requirement, Wychavon District Council is not proposing to undertake any further action under the LAQM regime.

Yours sincerely

VIC ALLISON
Deputy Managing Director