AIR QUALITY

PROPOSAL: SUFFOLK COUNTY COUNCIL SCC/0045/23SE

Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons - Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

These comments have been prepared by EPS, on behalf of West Suffolk Council.

Submissions Reviewed:

1. Air Quality Chapter within Environmental Statement prepared by SLR Consulting, dated May 2023. This constitutes an overview of the air quality impacts discussed within the below assessments.
2. Air Quality Assessment prepared by SLR, dated May 2023. This constitutes a Detailed Air Quality Impact Assessment in accordance with relevant guidance and the National Planning Policy Framework (NPPF).
3. Pipeline Air Quality Assessment prepared by SLR, dated March 2023. This constitutes a Detailed Air Quality Impact Assessment for the pipeline connecting the two sites in accordance with relevant guidance and the NPPF.

Air Quality Assessments:

Construction Phase Assessment:

- The Institute of Air Quality Management's (IAQM) 'Guidance on the assessment of dust from demolition and construction' (v1.1, February 2014) has been used to assess the dust risk in the area surrounding the site and to calculate the sensitivity. Trackout should be considered 500m from the site entrance in each direction, rather than 250m in each direction.
- Since submission of this report, the IAQM have updated the construction dust assessment guidance (v2.1, August 2023) which could potentially change the dust emission magnitudes for this site. As the trackout impacts need to be updated, it would be prudent to update the entirety of the construction dust assessment to meet the current guidance.
- To ensure dust mitigation measures are undertaken, a Dust Management Plan or Construction Environmental Management Plan (CEMP) should be submitted in support of the application.

Operational Phase Assessment:

- Assessment seems appropriate and the correct choice of meteorological station has been used by paying attention to the similarity in elevation with the site and need for low wind speeds to accurately represent a worst-case scenario.

Odour Assessment:

- The Institute of Air Quality Management's (IAQM) 'Guidance on the assessment of odour for planning' (v1.1, July 2018) has been used and the assessment appears fair considering the distance between highly sensitive

receptors and the proposed measures to minimise odour (enclosed or partially enclosed storage, vacuum pump during liquid digestate removal etc.).
- EPS have not reviewed the odour nuisance potential and input from the Council's Environmental Health Officers would be required on that aspect.

Dust Impact Assessment:

- IAQM 'Guidance on the Assessment of mineral dust impacts for planning' (v1.1, May 2016) has been followed and mitigation measures have been implemented into the operations plan, particularly, the loading of trailers will be carried out within a building.

Traffic Screening Assessment:

- Although the proposed development's predicted impact is considered not significant, the planning process presents the opportune moment to introduce measures to improve the development to encourage a low emission approach. These could include measures such as the use of Euro VI HDVs, electric vehicle charging points and car share schemes for future employees.

Bioaerosols Assessment:

- A bioaerosols assessment has been screened out as although sensitive receptors are located within 250m of the site boundary, the sensitive receptors are located more than 250m from the potential sources of bioaerosols.

Ammonia Impact Assessment:

- An ammonia impact assessment has been carried out using the AERMOD model in accordance with the Air Emissions Risk Assessment guidance and the additional guidance provided by the Air Quality Modelling & Assessment Unit of the Environment Agency which did not find any significant impacts to result from the proposed development.

Pipeline Air Quality Assessment:

- The Institute of Air Quality Management's (IAQM) 'Guidance on the assessment of dust from demolition and construction' (v1.1, February 2014) has been followed to assess the dust risk and sensitivity of the area surrounding the proposed pipeline. As discussed previously, to ensure dust mitigation measures are adhered to, a Dust Management Plan or Construction Environmental Management Plan (CEMP) should be submitted in support of the application. A joint Dust Management Plan or CEMP for the pipeline and main sites should suffice.

In summary, the construction phase and operational phase assessments included within the Air Quality Assessments for the main anaerobic digester site and the associated pipeline appear to have appropriately assessed the potential impacts

of the development. On the basis of impacts on local air quality, there does not appear to be any justification for objecting to the scheme.

EPS would recommend a condition is attached to the decision notice requiring a Dust Management Plan or Construction Environmental Management Plan to ensure nuisance resulting from construction is kept to a minimum and the minor updates to the Construction Phase Assessment described above could be undertaken alongside. EPS would also encourage a condition relating to electric vehicle charging facilities providing the Council's policy position supports it. It is assumed that input on odour management will be sought from the Council's Environmental Health Officers and when operational, emissions from the facility will be regulated though the environmental permitting regulations.

- END -