



Environmental Permit Application - Aylesbury Sludge Treatment  
Centre

Air Quality Impact Assessment

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Thames Water Utilities Limited



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## Executive Summary

Under the Industrial Emissions Directive (IED) the existing anaerobic digestion assets at Aylesbury Sludge Treatment Centre (STC) located at the Aylesbury Sewage Treatment Works (STW) require an Environmental Permit (EP). The scope of anaerobic digestion activities includes all treatment stages and incorporates directly associated activities such as a combined heat and power (CHP) gas engine and boilers.

Thames Water Utilities Limited operate a STW near the town of Aylesbury, Aylesbury Vale (HP19 8UX). These operations include one existing Caterpillar (CAT) CHP engine (with a thermal capacity of 0.94 MW<sub>th</sub>) and two existing Strebel auxiliary boilers (each with a thermal input capacity of 0.67 MW<sub>th</sub>). These units fall below the threshold of the Medium Combustion Plant Directive.

### Assessed Combustion Plant

Medium Combustion Plant (MCP) Information			
MCP specific identifier*	Aylesbury - CHP 1	Aylesbury – Boiler 1	Aylesbury – Boiler 2
12-digit grid reference or latitude/longitude	E 478968 N 214626	E 478958 N 214606	E 478960 N 214608
Rated thermal input (MW) of the MCP	0.94	0.67	0.67
Type of MCP (diesel engine, gas turbine, other engine or other MCP)	Gas engine	Boiler	Boiler
Type of fuels used: gas oil (diesel), natural gas, gaseous fuels other than natural gas	Biogas	Dual fuelled (Biogas / Diesel). Modelled with biogas.	Dual fuelled (Biogas / Diesel). Modelled with biogas.
Date when the new MCP was first put into operation (DD/MM/YYYY)	1998	Pre 2015	Pre 2015
Sector of activity of the MCP or the facility in which it is applied (NACE code**)	E.37.00	E.37.00	E.37.00
Expected number of annual operating hours of the MCP and average load in use	8,760 (based on availability)	8,760 (based on availability)	8,760 (based on availability)
Where the option of exemption under Article 6(8) is used the operator (as identified on Form A) should sign a declaration here that the MCP will not be operated more than the number of hours referred to in this paragraph	N / A	N / A	N / A

The Environmental Permit application is collated to include the required forms: Part A, B2.5 and F1. As the site has a CHP engine, the information required to complete Appendix 1 of application form Part B2.5 is included within this document.

The Air Quality Impact Assessment presented within this report is required to support the EP application and assesses the potential for significant air quality effects from the operation of the CHP engine and boilers at the Aylesbury STW.

The potential impacts were determined for the following aspects.

- The potential impact on human health due to emissions of pollutants. The pollutants considered include nitrogen dioxide (NO<sub>2</sub>); carbon monoxide (CO); sulphur dioxide (SO<sub>2</sub>), total volatile organic compounds (TVOC's) and particulate matter (PM<sub>10</sub>, particles with an aerodynamic diameter of 10 microns or less and PM<sub>2.5</sub>, particles with an aerodynamic diameter of 2.5 microns or less).
- The potential impact on vegetation and ecosystems due to emissions of oxides of nitrogen (NO<sub>x</sub>) and SO<sub>2</sub>.

#### Human receptors

The assessment indicates that the predicted modelled off-site concentrations and predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'.

This assessment has been carried out on the assumption that the CHP engine and boilers would operate simultaneously and continuously at maximum load all year. This is a conservative assumption as, in practice, the assessed combustion plant will have periods of shut-down and maintenance and may not always operate at maximum load.

#### Protected conservation areas

For critical levels, the results indicate that at the assessed Chiltern Beechwoods SAC, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed Aylesbury Sewage Works LWS, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the relevant long-term environmental standard and their impact can also be described as 'insignificant'.

For the 24-hour mean critical level for NO<sub>x</sub>, the results indicate that at that at the assessed Chiltern Beechwoods SAC, the PC for short-term mean concentrations is less than 10% of the short-term environmental standard for protected conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and can be described as 'insignificant'. For the assessed Aylesbury Sewage Works LWS, the short-term NO<sub>x</sub> PC is less than 100% of the short-term environmental standard and can also be described as 'insignificant'.

For acid deposition and nutrient nitrogen deposition, the results indicate that at the assessed Chiltern Beechwoods SAC, the respective PCs are less than 1% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a). For the assessed Aylesbury Sewage Works LWS, the respective PCs are less than 100% of the relevant long-term environmental standard for protected conservation areas and the impact can also be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

## Summary

Based on the above assessment, it is concluded that the assessed CHP engine and boilers are acceptable from an air quality perspective

# 1. Introduction

## 1.1 Background

Under the Industrial Emissions Directive (IED) the anaerobic digestion assets at Aylesbury Sludge Treatment Centre (STC) located at the Aylesbury Sewage Treatment Works (STW) are required to be included in an Environmental Permit (EP). The scope of anaerobic digestion activities includes all treatment stages and incorporates directly associated activities such as a combined heat and power (CHP) gas engine and boilers.

Thames Water Utilities Limited (hereafter 'Thames Water') currently operates one biogas fuelled Caterpillar (CAT) CHP engine (with a thermal capacity of 0.94 MW<sub>th</sub>) and two duel-fuelled<sup>1</sup> Strebels auxiliary boilers (each with a thermal input capacity of 0.67 MW<sub>th</sub>) at the Aylesbury STW near the town of Aylesbury, Aylesbury Vale (HP19 8UX) (hereafter 'the site'). Jacobs UK Limited (hereafter 'Jacobs') has carried out an Air Quality Impact Assessment (AQIA) on behalf of Thames Water to assess the potential impact of emissions from the existing CHP engine and boilers.

## 1.2 Study Outline

This AQIA is required to support the EP application and assesses the likely significant air quality effects of emissions to air from the CHP engine and boilers (which provide heat to the digesters) at the site. The air quality assessment has been carried out following the relevant Environment Agency guidance (Environment Agency, 2021a; 2021b). The AQIA considers the following.

- The potential impact on human health due to emissions of pollutants. The pollutants considered include nitrogen dioxide (NO<sub>2</sub>); carbon monoxide (CO); sulphur dioxide (SO<sub>2</sub>), total volatile organic compounds (TVOC's) and particulate matter (PM<sub>10</sub>, particles with an aerodynamic diameter of 10 microns or less and PM<sub>2.5</sub>, particles with an aerodynamic diameter of 2.5 microns or less).
- The potential impact on vegetation and ecosystems due to emissions of oxides of nitrogen (NO<sub>x</sub>) and SO<sub>2</sub>.

The site boundary (represented by the approximate site fenceline) is presented in Figure 1.

This report draws upon information provided from the following parties:

- Thames Water;
- ADM Ltd;
- Centre for Ecology and Hydrology (CEH);
- Aylesbury Vale District Council (AVDC); and
- Department for Environment, Food and Rural Affairs (Defra).

This report includes a description of the emission sources, description of methodology and significance criteria, a review of the baseline conditions including an exploration of the existing environment of the site and surrounding area, an evaluation of results and the potential impact of emissions on human health and protected conservation areas during operation and, finally, conclusions of the assessment.

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<sup>1</sup> Dual fuelled utilising biogas or gas-oil (modelled as diesel).



## 2. Emission Sources

### 2.1 Emission Sources to Air

The location of the assessed existing CHP engine (emission point reference A1) and boilers (emission point reference A2 – A3) are presented in Figure 1.

The CHP engine and boilers (when utilising biogas) are fuelled by biogas generated from the sites' anaerobic digestion process and emissions were modelled on this basis. As discussed previously, the boilers are a dual-fuel design and can run on biogas or gas-oil. However, for this assessment they have been modelled utilising biogas as this gives a worst-case scenario for emissions of NO<sub>x</sub>, typically the pollutant of main concern. The modelling only considers emissions from the CHP engine and boilers and no other emission points to air at the site have been included in the assessment. It should be noted there are four on-site generators, which are only used in Triad or in an emergency and typically operate for less than 60 hours per year. These generators do not form part of the scope for this air dispersion modelling assessment.

Table 1 presents the emission sources to air considered in this assessment.

Table 1: Combustion plant to be assessed

Parameters	CAT CHP engine (0.94 MW <sub>th</sub> )	Strebel auxiliary boiler (0.67 MW <sub>th</sub> )	Strebel auxiliary boiler (0.67 MW <sub>th</sub> )
Modelled fuel	Biogas	Biogas	Biogas
Emission point	A1	A2	A3

This assessment has been carried out on the assumption that the CHP engine and boilers would operate simultaneously and continuously at maximum load throughout the year. This is a conservative assumption as, in practice, the combustion plant will have periods of shut-down and maintenance and may not always operate at maximum load. This approach ensures that the worst-case or maximum short-term modelled concentrations are quantified (further consideration of this is provided in Appendix A).

### 2.2 Emissions Data

It should be noted from the 1<sup>st</sup> January 2030, certain pollutant emission concentrations from the assessed combustion plant must adhere to emission concentration limits as set out in the Medium Combustion Plant Directive (MCPD) EU/2015/2193<sup>2</sup> (Schedule 25A of the Environmental Permitting (England and Wales) (Amendment) Regulations 2018).

For the assessed CHP engine, the NO<sub>x</sub>, CO and TVOC emission concentrations<sup>3</sup> were derived from the Environment Agency's guidance '*Guidance for monitoring landfill gas engine emissions*' (Environment Agency, 2010). For SO<sub>2</sub>, in the absence of a specific emission limit value, the SO<sub>2</sub> emission concentration typically used in similar permit applications for biogas fuelled engines has been applied. This is a conservative approach to the assessment as in practice, the SO<sub>2</sub> emission concentration is likely to be lower than that applied in the model. For particulates, in the absence of a specific emission limit value, the emission concentration was derived from a previous study of landfill gas engines (Land Quality Management Ltd, 2002).

For the boilers, as a worst-case approach to the assessment, the NO<sub>x</sub> and SO<sub>2</sub> emission concentrations are based on the emission limit values for existing MCP other than engines and gas turbines as regulated under the MCPD<sup>2</sup>. For CO and TVOC, in the absence of a specific emission limit value, the CO emission concentration was obtained

<sup>2</sup> European Parliament and the Council of the European Union, Medium Combustion Plant Directive EU/2015/2193 of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants.

<sup>3</sup> As the CHP engine was commissioned between 1 January 1998 and 31 December 2005, the following emission concentrations have been applied - NO<sub>x</sub> 650 mg/Nm<sup>3</sup> (at 5% oxygen), CO 1,500 mg/Nm<sup>3</sup> (at 5% oxygen) and TVOC 1,750 mg/Nm<sup>3</sup> (at 5% oxygen).

from Defra's Process Guidance Note 1/3, *'Statutory Guidance for Boilers and Furnaces 20-50MW thermal input'* (Defra, 2012) and the TVOC emission concentration was derived from the Environment Agency's guidance *'Guidance for monitoring landfill gas engine emissions'*, (Environment Agency, 2010).

For the assessed combustion plant, the respective exhaust gas volumetric flows were determined using stoichiometric calculations based on the combustion of biogas at the maximum thermal input rating of the CHP engine and boilers. In the absence of information regarding oxygen, moisture content and exhaust gas temperature, the data used in the model is based on professional judgment acquired from previous work involving biogas fuelled combustion plant of a similar thermal input capacity.

The emissions inventory of releases to air from the CHP engine and boilers are provided in Appendix A.

### 3. Assessment Methodology

This section presents a summary of the methodology used for the assessment of the potential impacts of the site. A full description of the study inputs and assumptions are provided in Appendix A.

#### 3.1 Assessment Location

For this assessment, 20 of the closest sensitive human receptors (such as residential properties, schools, residential care homes and Public Rights of Way (PRoW)) near the site were identified for modelling purposes. The location of these receptors is presented in Figure 2. There is an air quality management area (AQMA) in the vicinity of the site (see Section 4.2) which has also been included in the assessment.

In line with the Environment Agency guidance *Air emissions risk assessment for your environmental permit* (Environment Agency, 2021a), it is necessary to identify protected conservation areas within the following distances from the site:

- European sites (i.e. Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites) within 10 km; and
- Site of Special Scientific Interest (SSSI) and local nature sites (i.e. ancient woodlands, local wildlife sites (LWS) and national and local nature reserves (NNR and LNR), within 2 km.

Based on these criteria, Chiltern Beechwoods SAC and Aylesbury Sewage Works LWS have been included in the assessment.

The location of the assessed protected conservation areas are presented in Figure 3 and further details are set out in Appendix A.

#### 3.2 Overall Methodology

The assessment was carried out using an atmospheric dispersion modelling technique. Atmospheric Dispersion Modelling System (ADMS) version 5.2.4 was used to model releases of the identified substances. The ADMS model predicts the dispersion of operational emissions from a specific source (e.g. a stack), and the subsequent concentrations over an identified area (e.g. at ground level across a grid of receptor points) or at specified points (e.g. a residential property). ADMS was selected because this model is fit for the purpose of modelling the emissions from the type of sources on-site (i.e. point source emissions from a combustion source) and is accepted as a suitable assessment tool by local authorities and the Environment Agency.

The modelling assessment was undertaken in accordance with the Environment Agency *Air emissions risk assessment for your environmental permit* guidance (Environment Agency, 2021a).

A summary of the dispersion modelling procedure is set out below.

- 1) Information on plant location and stack parameters were supplied by Thames Water (Thames Water, 2021). Information on the CHP engine and the boilers were obtained from various sources as described in Section 2.2.
- 2) Five years of hourly sequential data recorded at the RAF Benson meteorological station (2016 – 2020 inclusive) were used for the assessment (ADM Ltd, 2021).
- 3) Information on the main buildings located on-site, which could influence dispersion of emissions from the CHP engine and boiler stacks, were estimated from Defra's environmental open-data applications and datasets (Defra, 2021a) and Google Earth (Google Earth, 2021).
- 4) The maximum predicted concentrations (at a modelled height of 1.5 m or 'breathing zone') at the assessed sensitive human receptor locations R1 – R16 (representing long-term exposure at residential properties) were considered for the assessment of annual mean, 24-hour mean, 8-hour mean, 1-hour mean and 15-minute mean pollutant concentrations within the study area. For receptors R17-R20 (representing a

PRoW), only the 1-hour mean and 15-minute mean concentrations were considered. The maximum predicted concentrations at an off-site location in the vicinity of the site were considered for the assessment of short-term (1-hour and 15-minute mean) concentrations. Due to the proximity of an AQMA to the site (see Section 4.2), a receptor location representing the AQMA was selected and the assessment of annual mean NO<sub>2</sub> concentrations was considered at this location.

- 5) The above information was entered into the dispersion model.
- 6) The dispersion model was run to provide the Process Contribution (PC). The PC is the estimated maximum environmental concentration of substances due to releases from the process alone. The results were then combined with baseline concentrations (see Section 4) to provide the total Predicted Environmental Concentration (PEC) of the substances of interest.
- 7) The PECs were then assessed against the appropriate environmental standards for air emissions for each substance set out in the Environment Agency's guidance (Environment Agency, 2021a) document to determine the nature and extent of any potential adverse effects.
- 8) Modelled concentrations were processed using geographic information system (GIS) software (ArcMap 10.8.1) to produce contour plots of the model results. These are provided for illustrative purposes only; assessment of the model results was based on the numerical values outputted by the dispersion model on the model grid (see Figure 2) and at the specific receptor locations and were processed using Microsoft Excel.
- 9) The predicted concentrations of NO<sub>x</sub> and SO<sub>2</sub> were also used to assess the potential impact on critical levels and critical loads (i.e. acid and nutrient nitrogen deposition) (see Section 3.3.2) at the assessed protected conservation area. Details of the deposition assessment methodology are provided in Appendix B.

In addition to the above, a review of existing ambient air quality in the area was undertaken to understand the baseline conditions at the site and at receptors within the study area. These existing conditions were determined by reviewing the monitoring data already available for the area and other relevant sources of information. The review of baseline air quality is set out in Section 4.

Where appropriate, a conservative approach has been adopted throughout the assessment to increase the robustness of the model predictions. In addition, an analysis of various sensitivity scenarios has also been carried out (see Section 5.3) to determine how changes to model parameters (e.g. differing surface roughness values or modelling without considering buildings) may impact on predicted concentrations at sensitive human receptors and off-site locations.

### 3.3 Assessment Criteria

#### 3.3.1 Environmental Quality Standards: Human Receptors

In the UK, the focus on local air quality is reflected in the air quality objectives (AQOs) set out in the Defra and the Devolved Administrations *Air Quality Strategy for England, Scotland, Wales and Northern Ireland* (AQS). The AQS stipulates a number of air quality objectives for nine main air pollutants with respect to ambient levels of air quality (Defra, 2007). The AQOs are similar to the limit values that were transposed from the relevant EU directives into UK legislation by *The Air Quality Standards Regulations 2010*. The objectives are based on the current understanding of health effects of exposure to air pollutants and have been specified to control health and environmental risks to an acceptable level. They apply to places where people are regularly present over the relevant averaging period. The objectives set for the protection of human health and vegetation of relevance to the project are summarised in Table 2. Relevant Environmental Assessment Levels (EALs) set out in the Environment Agency guidance (Environment Agency, 2021a) are also included in Table 2 where these supplement the AQOs.

For the purposes of reporting, the AQOs and EALs have been collectively termed as Environmental Quality Standards (EQSs).

Table 2: Air quality objectives and environmental assessment levels

Pollutant	EQS ( $\mu\text{g}/\text{m}^3$ )	Concentration measured as
NO <sub>2</sub>	40	Annual mean
	200	1-hour mean, not to be exceeded more than 18 times a year (99.79 <sup>th</sup> percentile)
CO	10,000	Maximum daily 8 hour running mean (100 <sup>th</sup> percentile)
	30,000	Maximum 1-hour mean (100 <sup>th</sup> percentile)
SO <sub>2</sub>	125	24-hour mean not to be exceeded more than 3 times a year (99.18 <sup>th</sup> percentile)
	350	1-hour mean not to be exceeded more than 24 times a year (99.73 <sup>rd</sup> percentile)
	266	15-minute mean not to be exceeded more than 35 times a year (99.9 <sup>th</sup> percentile)
PM <sub>10</sub>	40	Annual mean
	50	24-hour mean, not to be exceeded more than 35 times a year (90.41 <sup>st</sup> percentile)
PM <sub>2.5</sub>	25	Annual mean
TVOC	n/a <sup>1</sup>	Annual mean
		Maximum 1-hour mean (100 <sup>th</sup> percentile)

Note 1: VOCs may contain a wide range of organic compounds and it is often difficult to determine or identify each and every compound present. The TVOC emissions from the assessed combustion plant will largely comprise methane which is not directly harmful to human health. Therefore, there is no health-based air quality standard or guideline.

For the assessment of long-term average concentrations (i.e. the annual mean concentrations) at human receptors, impacts were described using the following criteria:

- if the PC is less than 1% of the long-term EQS, the contribution can be considered as 'insignificant' and not representative of a significant effect (i.e. not significant) (Environment Agency, 2021b);
- if the PC is greater than 1% of the EQS but the PEC is less than 70% of the long-term air quality objective, based on professional judgement, this would be classed as 'not significant'
- where the PC is greater than 1% of the EQS and the PEC is greater than 70% of the EQS, professional judgement is used to determine the overall significance of the effect (i.e. whether the effect would be 'not significant' or 'significant'), taking account of the following:
  - the scale of the changes in concentrations;
  - whether or not an exceedance of an EQS is predicted to arise in the study area where none existed before, or an exceedance area is substantially increased as a result of the development; and
  - uncertainty, including the influence and validity of any assumptions adopted in undertaking the assessment.

For the assessment of short-term average concentrations (e.g. the 1-hour mean NO<sub>2</sub> concentrations, and the 15-minute, 1-hour and 24-hour mean SO<sub>2</sub> concentrations etc.), impacts were described using the following criteria:

- if the PC is less than 10% of the short-term EQS, this would be classed as 'insignificant' and not representative of a significant effect (i.e. not significant) (Environment Agency, 2021b);
- if the PC is greater than 10% of the EQS but less than 20% of the headroom between the short-term background concentration and the EQS, based on professional judgement, this can also be described as not significant;
- where the PC is greater than 10% of the EQS and 20% of the headroom, professional judgement is used to determine the overall significance of the effect (i.e. whether the effect would be not significant or significant) in line with the approach specified above for long-term average concentrations.

Environment Agency guidance recommends that further action will not be required if proposed emissions comply with Best Available Techniques Associated Emission Levels (BAT AELs) and resulting PECs do not exceed the relevant EQS (Environment Agency, 2021a).

### 3.3.2 Environmental Quality Standards: Protected Conservation Areas

#### Critical levels

The environmental standards set for protected conservation areas of relevance to the project are summarised in Table 3 (Environment Agency, 2021a).

Table 3: Air Quality Objectives and Environmental Assessment Levels for protected conservation areas

Pollutant	EQS ( $\mu\text{g}/\text{m}^3$ )	Concentration measured as
NO <sub>x</sub>	30	Annual mean limit value for the protection of vegetation (referred to as the "critical level")
	75	Maximum 24-hour mean for the protection of vegetation (referred to as the "critical level")
SO <sub>2</sub>	10	Annual mean limit value for the protection of vegetation (referred to as the "critical level") where lichens or bryophytes are present
	20	Annual mean limit value for the protection of vegetation (referred to as the "critical level") where lichens or bryophytes are not present

#### Critical loads

Critical loads for pollutant deposition to statutorily designated habitat sites in the UK and for various habitat types have been published by the CEH and are available from the APIS website. Critical Loads are defined on the APIS website (Centre for Ecology and Hydrology, 2021) as:

*"a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge".*

Compliance with these benchmarks is likely to result in no significant adverse effects on the natural environment at these locations. The critical loads for the designated habitat sites considered in this assessment are set out in Table 4. For the assessed European designated site, the Site Relevant Critical Loads tool function on the APIS website was used to determine the relevant critical loads for the assessed protected conservation area. It should be noted where both vegetation types (i.e. short or tall) are listed on the APIS website as being present at the assessed protected conservation area, the most sensitive habitat for both short and tall vegetation were applied in the assessment, irrespective of whether the vegetation is actually present at the modelled location(s).

For the assessed Aylesbury Sewage Works LWS, the Search by Location function on the APIS website was used. Where both short and tall vegetation type is assumed to inhabit the assessed local nature site, the acid grassland and coniferous woodland habitat feature were selected on the APIS website which are generally the most sensitive short and tall vegetation type to nutrient nitrogen and acid deposition.

Table 4: Critical loads for modelled protected conservation areas

Receptor ref	Protected conservation area	Habitat feature applied	Vegetation type (for deposition velocity)	Critical load			
				Acid deposition (kEqH <sup>+</sup> /ha/year)			Nitrogen deposition (kg N/ha/year)
				CLMaxS	CLMinN	CLMaxN	Minimum
H1	Chiltern Beechwoods SAC	Sub-atlantic semi-dry calcareous grassland	Short	4.000	0.900	4.900	15
		Fagus woodland	Tall	10.800	0.100	11.000	10
H2		Acid grassland	Short	1.610	0.438	2.048	5

Receptor ref	Protected conservation area	Habitat feature applied	Vegetation type (for deposition velocity)	Critical load			
				Acid deposition (kEqH <sup>+</sup> /ha/year)			Nitrogen deposition (kg N/ha/year)
				CLMaxS	CLMinN	CLMaxN	Minimum
	Aylesbury Sewage Works LWS	Coniferous woodland	Tall	2.509	0.357	2.866	5

Critical load functions for acid deposition are specified on the basis of both nitrogen-derived acid and sulphur derived acid. The critical load function contains a value for sulphur derived acid and two values for nitrogen derived acid deposition (a minimum and maximum value). The APIS website provides advice on how to calculate the process contribution (PC – emissions from the modelled process alone) and the predicted environmental concentrations (PEC – the PC added to the existing deposition) as a percentage of the acid critical load function and how to determine exceedances of the critical load function. This guidance was adopted for this assessment. The minimum of the range of nitrogen critical loads was used for the assessment in line with the advice on the APIS website (Centre for Ecology and Hydrology, 2021).

Significance Criteria – European designated site (i.e. Chiltern Beechwoods SAC)

With regard to concentrations at the assessed designated habitat sites, the Environment Agency guidance (Environment Agency, 2021a) states emissions can be described as insignificant and no further assessment is required (including the need to calculate PECs) if:

- the short-term PC is less than 10% of the short-term environmental standard for protected conservation areas; or
- the long-term PC is less than 1% of the long-term environmental standard for protected conservation areas.

Where appropriate, the significance of the predicted long-term (annual mean) concentrations or deposition at protected conservation areas were determined in line with Environment Agency guidance (Environment Agency, 2021a) summarised as follows.

- Where the PC is less than 1% of the relevant critical level or critical load, the emission is not likely to have a significant effect alone or in combination irrespective of the existing concentrations or deposition rates.
- Where the PC is above 1%, further consideration of existing background concentrations or deposition rates is required, and where the total concentration or deposition is less than 70% of the critical level or critical load, calculated in combination with other committed projects or developments as appropriate, the emission is not likely to have a significant effect.
- Where the contribution is above 1%, and the total concentration or deposition rate is greater than 70% of the critical level or critical load, either alone or in combination with other committed projects or developments, then this may indicate a significant effect and further consideration is likely to be required.

The above approach is used to give a clear definition of what effects can be disregarded as insignificant, and which need to be considered in more detail in relation to the predicted annual mean concentrations or deposition.

For short-term mean concentrations (i.e. the 24-hour mean critical level for NO<sub>x</sub>) where the PC is less than 10% of the critical level then it would be regarded as 'insignificant'. A potentially significant effect would be identified where the short-term PC from the modelled sources would lead to the total concentration exceeding the critical level. Further consideration is likely to be required in this situation.

Significance Criteria – Local nature site (i.e. Aylesbury Sewage Works LWS)

The relevant significance criteria for these protected conservation areas are set out below.

With regard to concentrations or deposition rates at local nature sites, the Environment Agency guidance (Environment Agency, 2021a) states emissions can be described as 'insignificant' and no further assessment is required (including the need to calculate PECs) if:

- the short-term PC is less than 100% of the short-term environmental standard for protected conservation areas; or
- the long-term PC is less than 100% of the long-term environmental standard for protected conservation areas.

The above approach is used to give a clear definition of what effects can be disregarded as 'insignificant', and which need to be considered in more detail in relation to the predicted annual mean concentrations or deposition.



## 4. Existing Environment

### 4.1 Site Location

The site is situated approximately 3.2 km west-northwest from the centre of the town of Aylesbury, Aylesbury Vale. The area surrounding the site generally comprises a mixture of agricultural and commercial land use with sporadic residential properties. Aylesbury Sewage Works LWS is adjacent to the western and southern boundary of the site.

There are several sensitive human receptors in the vicinity of the site in respect of potential air emissions from the process. The most relevant sensitive receptors have been identified from local mapping and are summarised in Appendix A and presented in Figure 2. The nearest modelled residential property is approximately 0.21 km south-southeast of the CHP engine (based on the stack location National Grid Reference (NGR) E 478968 N 214626).

### 4.2 Local Air Quality Management

A review of baseline air quality was carried out prior to undertaking the air quality assessment. This was carried out to determine the availability of baseline air quality data recorded in the vicinity of the site and also if data from other regional or national sources such as the UK Air Information Resource (UK-AIR) (Defra, 2021b) website could be used to represent background concentrations of the relevant pollutants in the vicinity of the site.

As part of the Local Air Quality Management (LAQM) process, AVDC has declared three AQMAs across its administrative borough. The nearest AQMA is termed 'Friarage Road AQMA' which was declared due to exceedances of the annual mean NO<sub>2</sub> AQO in 2008. This AQMA is approximately 2.5 km east-southeast of the site (based on the location of the CHP engine) and is considered in the assessment.

AVDC also carries out regular assessments and monitoring of air quality within the respective boroughs as part of the LAQM process. The most recent Air Quality Annual Status Report (Aylesbury Vale District Council, 2020) was reviewed to determine the concentrations of NO<sub>2</sub> in the vicinity of the site. It should be noted none of the other assessed pollutants are monitored by AVDC. Table 5 presents information on the nearest monitoring locations to the site.

Table 5: Nearest monitoring locations to the site

Site ID	Description	Site type	Location	Distance and direction from CHP engine	Pollutants monitored	2019 Annual mean concentration (µg/m <sup>3</sup> )
Automatic monitoring						
Aylesbury Vale District Council did not undertake any continuous monitoring during 2019						
Non-automatic monitoring						
DT24	Stonehaven Road/Bicester Road, Aylesbury	Roadside diffusion tube	E 480710 N 214576	1.7 km, East	NO <sub>2</sub>	33.6

The non-automatic monitoring location presented in Table 5 is not considered representative of the site due to the monitoring site type and its location adjacent to the A41 road.

For the assessed pollutants, information on background air quality in the vicinity of the site was obtained from Defra background map datasets (Defra, 2021b). The 2018-based background maps by Defra are estimates based upon the principal local and regional sources of emissions and ambient monitoring data. For SO<sub>2</sub> and CO concentrations, the 2001-based background maps were used. These background concentrations are presented in Table 6. It should be noted there are no background concentrations available for TVOC's.

As it is necessary to determine the potential impact of emissions from the site on the assessed protected conservation areas, the background concentrations of NO<sub>x</sub> and SO<sub>2</sub> were also identified for the assessed protected conservation areas. These background concentrations were also obtained from Defra background map datasets (Defra, 2021b) and are displayed in Table 6 and Table 9.

Table 6: Background concentrations: adopted for use in assessment for assessed human receptors and protected conservation areas

Pollutant	Annual mean concentration (µg/m <sup>3</sup> )	Description
Human receptors		
NO <sub>2</sub>	8.0 – 9.8	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
CO	111 - 127	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, scaled from 2001-based map <sup>1</sup> to 2021 concentration
PM <sub>10</sub>	14.4 – 14.7	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
PM <sub>2.5</sub>	9.1 – 10.0	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
SO <sub>2</sub>	3.1 – 4.3	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2001 map concentration
TVOC	n/a	
Protected conservation areas		
NO <sub>x</sub>	9.4 – 12.8	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
SO <sub>2</sub>	3.1 – 4.3	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2001 map concentration

The long-term background concentrations were doubled to estimate the short-term background concentrations in line with the Environment Agency guidance (Environment Agency, 2021a).

### 4.3 Existing Deposition Rates

Existing acid and nutrient nitrogen deposition levels were obtained from APIS (Centre for Ecology and Hydrology, 2021). Where both vegetation types (i.e. short or tall) are listed on the APIS website as being present at the assessed protected conservation areas, the most sensitive habitat for both short and tall vegetation, was used for the assessment to represent the differing deposition rates for these vegetation types. As a conservative approach to the assessment, it is assumed the vegetation type selected is present at the specific modelled location within the assessed protected conservation area. The existing deposition values at the assessed habitat site are set out in Table 7.

Table 7: Existing deposition at modelled habitat sites

Receptor ref	Protected conservation area	Vegetation type (for deposition velocity)	Existing deposition rates		
			Existing acid deposition (kEqH <sup>+</sup> /ha/year)		Existing nutrient N deposition (kg N/ha/year)
			Nitrogen	Sulphur	Nitrogen
H1	Chiltern Beechwoods SAC	Short	1.30	0.10	17.64
		Tall	2.20	0.20	30.80
H2	Aylesbury Sewage Works LWS	Short	1.39	0.13	19.46
		Tall	2.50	0.16	35.00

## 5. Results

### 5.1 Human Receptors

The results presented below are the maximum modelled concentrations predicted at any of the 20 assessed sensitive human receptor locations, the assessed AQMA and the maximum modelled concentration at any off-site location for the five years of meteorological data used in the study.

The results of the dispersion modelling are set out in Table 8, which presents the following information:

- EQS (i.e. the relevant air quality standard);
- estimated annual mean background concentration (see Section 4) that is representative of the baseline;
- PC, the maximum modelled concentrations due to the emissions from the assessed combustion plant;
- PEC, the maximum modelled concentration due to process emissions combined with estimated baseline concentrations;
- PC and PEC as a percentage of the EQS; and
- PC as a percentage of headroom (i.e. the PC as a percentage of the difference between the short-term background concentration and the EQS, for short-term predictions only).

The full results at assessed human receptor locations are presented in Appendix C.

Table 8: Results of detailed assessment

Pollutant	Averaging period	Assessment location	Maximum receptor	EQS ( $\mu\text{g}/\text{m}^3$ )	Baseline air quality level ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC / EQS (%)	PEC / EQS (%)	PC as a percentage of headroom (%)
CO	Maximum 8-hour running mean	Sensitive locations	R11	10,000	253	121.3	374.6	1.2%	3.7%	1.2%
	Maximum 1-hour mean	Maximum off-site	-	30,000	253	424.2	677.5	1.4%	2.3%	1.4%
		Sensitive locations	R11	30,000	253	170.7	424.0	0.6%	1.4%	0.6%
NO <sub>2</sub>	Annual mean	Sensitive locations	R1	40	8.5	1.4	9.9	3.4%	24.7%	-
		Friarage Road AQMA	-		-	0.05	-	0.1%	-	-
	1-hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	-	200	17.0	42.5	59.5	21.2%	29.8%	23.2%
		Sensitive locations	R11	200	19.5	18.5	38.0	9.3%	19.0%	10.3%
SO <sub>2</sub>	24-hour mean (99.18 <sup>th</sup> percentile)	Sensitive locations	R11	125	8.7	13.3	22.0	10.7%	17.6%	11.5%
	1-hour mean (99.73 <sup>rd</sup> percentile)	Maximum off-site	-	350	8.7	61.5	70.1	17.6%	20.0%	18.0%
		Sensitive locations	R11	350	8.7	29.2	37.9	8.4%	10.8%	8.6%
	15-minute mean (99.9 <sup>th</sup> percentile)	Maximum off-site	-	266	6.9	122.5	129.4	46.1%	48.7%	47.3%
Sensitive locations		R11	266	8.7	41.3	50.0	15.5%	18.8%	16.1%	
PM <sub>10</sub>	Annual mean	Sensitive locations	R11	40	14.5	0.03	14.6	0.1%	36.4%	-
	24-hour mean (90.41 <sup>st</sup> percentile)	Sensitive locations	R11	50	29.1	0.1	29.2	0.2%	58.3%	0.5%
PM <sub>2.5</sub>	Annual mean	Sensitive locations	R11	25	10.0	0.03	10.0	0.1%	40.0%	-
TVOC	Annual mean	Sensitive locations	R11	n/a		6.1	n/a			
	Maximum 1-hour mean	Maximum off-site	-			494.9				
		Sensitive locations	R11			215.9				

Note 1: For annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> and TVOC concentrations, 24-hour mean PM<sub>10</sub> and SO<sub>2</sub> concentrations and 8-hour mean CO concentrations, R17 – R20 have been omitted from analysis as these receptor locations represent a PRoW (i.e. short-term exposure only). The full results are presented in Appendix C.

The results in Table 8 indicate that the predicted off-site concentrations and predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline.

Table 8 indicates that the maximum PC for annual mean NO<sub>2</sub> at a sensitive human receptor location is 1.4 µg/m<sup>3</sup> (equating to 3.4% of the relevant EQS) and is predicted at R1, which represents a residential property approximately 0.4 km north of the CHP engine stack. The PC is greater than 1% of the relevant EQS but the PEC is less than 70% of the EQS (i.e. 24.7%) and based on professional judgement, the impact can be classed as 'not significant'. As discussed previously, this assessment assumes the combustion plant operate simultaneously and continuously at maximum load. In practice, the combustion plant will have periods of shut-down and maintenance and may not always operate at maximum load. At the assessed Friarage Road AQMA, the maximum PC for annual mean NO<sub>2</sub> is 0.05 µg/m<sup>3</sup> (equating to 0.1% of the relevant EQS).

For the assessment of 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a sensitive human receptor location, the maximum PC of 18.5 µg/m<sup>3</sup> (which equates to 9.3% of the relevant EQS) is predicted at R11, which represents a residential property approximately 0.2 km south-southeast of the CHP engine stack. The PC is less than 10% of the short-term EQS and is considered 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a) and therefore 'not significant'. For the assessment of 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a modelled off-site location, the maximum PC is 42.5 µg/m<sup>3</sup>, which equates to 21.2% of the relevant EQS. The PC is greater than 10% of the short-term EQS and greater than 20% of the headroom between the short-term background concentration and the EQS. However, as the PEC is less than 70% of the EQS (i.e. 29.8%), based on professional judgement, the impact can be classed as 'not significant'. To note, this concentration is predicted at NGR E 478938 N 214776 which is situated adjacent to the north-western boundary of the site within Aylesbury Sewage Works LWS.

For long-term PM<sub>10</sub> and PM<sub>2.5</sub> concentrations, the respective PCs are less than 1% of the relevant long-term EQS and are considered 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a) and therefore 'not significant'. For 24-hour mean (90.41<sup>st</sup> percentile) PM<sub>10</sub> concentrations, the PC is less than 10% of the relevant short-term EQS (i.e. 0.2%) and its impact can be described as 'insignificant' and therefore 'not significant'.

For short-term CO concentrations at both sensitive human receptor locations and modelled off-site locations, the respective PCs are less than 10% of the relevant short-term EQS and their impact is considered 'insignificant' and not representative of a significant effect (i.e. not significant).

For 24-hour mean (99.18<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a sensitive human receptor location, the highest PC of 13.3 µg/m<sup>3</sup> is predicted at R11. The PC is just above 10% of the short-term EQS but less than 20% of the headroom between the short-term background concentration and the EQS and therefore, based on professional judgement, is considered 'not significant'.

For 1-hour mean (99.73<sup>rd</sup> percentile) SO<sub>2</sub> concentrations at a sensitive human receptor location, the maximum PC of 29.2 µg/m<sup>3</sup> (predicted at R11) is less than 10% of the short-term EQS and its impact is considered 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a) and therefore 'not significant'. For 1-hour mean (99.73<sup>rd</sup> percentile) SO<sub>2</sub> concentrations at a modelled off-site location, the maximum PC of 61.5 µg/m<sup>3</sup> is greater than 10% of the short-term EQS but less than 20% of the headroom and based on professional judgement, the impact is considered 'not significant'. To note, this concentration is predicted at NGR E 478918 N 214736 which is situated adjacent to the north-western boundary of the site within Aylesbury Sewage Works LWS.

For 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a sensitive human receptor location, the maximum PC of 41.3 µg/m<sup>3</sup> (predicted at R11) is greater than 10% of the short-term EQS but less than 20% of the headroom and based on professional judgement, is considered 'not significant'. For 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a modelled off-site location, the maximum PC of 122.5 µg/m<sup>3</sup> is greater than 10% of the relevant EQS and greater than 20% of the headroom between the short-term background concentration and the EQS. However, as the PEC is well within the relevant EQS (i.e. 48.7%), based on

professional judgement, the impact is considered 'not significant'. This concentration is predicted at NGR E 478948 N 214786 which is situated within Aylesbury Sewage Works LWS.

For annual mean TVOC concentrations at a sensitive human receptor location, the maximum PC of  $6.1 \mu\text{g}/\text{m}^3$  is predicted at R11. For maximum 1-hour mean TVOC concentrations at a sensitive human receptor location, the maximum PC is  $215.9 \mu\text{g}/\text{m}^3$  and is predicted at R11. For maximum 1-hour mean TVOC concentrations at a modelled off-site location, the highest PC of  $494.9 \mu\text{g}/\text{m}^3$  is predicted at NGR E 478828 N 214546 which is situated adjacent to the north-western boundary of the site within Aylesbury Sewage Works LWS.

As discussed previously, the TVOCs from the assessed combustion plant will largely comprise unburnt methane gas from the biogas fuel, which is not directly harmful to human health at the concentrations predicted by the dispersion modelling.

## Summary

The results in Table 8 indicate that the predicted modelled off-site concentrations and predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. Furthermore, the conservative approach adopted throughout the assessment means the predicted concentrations presented in Table 8 are likely to be higher than would reasonably be expected.

Contour plots (see Figures 4 - 7) have been produced for annual mean and 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations, 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations. For annual mean NO<sub>2</sub> concentrations, the figure is based on the year of meteorological data which resulted in the highest PC at a sensitive human receptor location. For short-term concentrations, the figures are based on the year of meteorological data which resulted in the highest PC at an off-site location.

## 5.2 Protected Conservation Areas

### 5.2.1 Assessment against Critical Levels

The environmental effects of releases from the site at the assessed protected conservation areas have been determined by comparing predicted concentrations of released substances with the EQSs for the protection of vegetation (critical levels) (see Table 3). The results of the detailed modelling at the assessed protected conservation areas are shown in Table 9. The results presented are the maximum predicted concentration at each assessed protected conservation area for the five years of meteorological data used in the study.

For SO<sub>2</sub>, the relevant EQS was based on the assumption that lichens and bryophytes were present at each site, therefore adopting a conservative approach.

Table 9: Results of detailed assessment at assessed protected conservation sites for annual mean NO<sub>x</sub> and SO<sub>2</sub> concentrations and for maximum 24-hour mean NO<sub>x</sub> concentrations

Ref	Protected Conservation Area	EQS (µg/m <sup>3</sup> )	Background concentration (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
Annual mean NO <sub>x</sub> concentrations							
H1	Chiltern Beechwoods SAC	30	9.4	0.02	9.4	0.1%	31.5%
H2	Aylesbury Sewage Works LWS		11.0	10.1	21.2	33.7%	70.5%
Annual mean SO <sub>2</sub> concentrations							
H1	Chiltern Beechwoods SAC	10	3.1	0.01	3.1	0.1%	30.6%
H2	Aylesbury Sewage Works LWS		3.5	6.1	9.5	60.7%	95.2%
Maximum 24-hour mean NO <sub>x</sub> concentrations							
H1	Chiltern Beechwoods SAC	75	18.9	0.4	19.3	0.5%	25.7%
H2	Aylesbury Sewage Works LWS		25.7	70.3	96.0	93.8%	128.0%

The results in Table 9 indicate that at the assessed Chiltern Beechwoods SAC, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed Aylesbury Sewage Works LWS, the annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the long-term environmental standard and their impact can also be described as 'insignificant'.

The maximum short-term mean concentrations which were assessed against the 24-hour mean critical level for NO<sub>x</sub> (i.e. 75 µg/m<sup>3</sup>) are also presented in Table 9. The results indicate that at the assessed Chiltern Beechwoods SAC, the PC for short-term mean concentrations is less than 10% of the short-term environmental standard for protected conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and can be described as 'insignificant'. For the assessed Aylesbury Sewage Works LWS, the short-term NO<sub>x</sub> PC is less than 100% of the short-term environmental standard and can also be described as 'insignificant'.

## Summary

The conservative approach adopted throughout this assessment means that, based on professional judgement, it is not considered likely that there would be unacceptable impacts to air quality at the assessed protected conservation areas as a consequence of the operation of the assessed CHP engine and boilers with regard to ambient concentrations of NO<sub>x</sub> and SO<sub>2</sub>.

### 5.2.2 Assessment against Critical Loads

The rate of deposition of acidic compounds and nitrogen containing species have been estimated at the assessed protected conservation areas. This allows the potential for adverse effects to be evaluated by comparison with critical loads for acid and nutrient nitrogen deposition. The assessment took account of emissions of NO<sub>x</sub> and SO<sub>2</sub> only.

Critical load functions for acid deposition are specified on the basis of both nitrogen-derived acid and sulphur-derived acid. This information, including existing deposition levels at habitat sites, is available from APIS (Centre for Ecology and Hydrology, 2021). Further information on the assessment of deposition is provided in Appendix B. The full detailed modelled results are displayed in Table 10 and Table 11.



Table 10: Modelled acid deposition at assessed protected conservation areas

Ref	Habitat	Vegetation type (for deposition velocity)	Critical load (CL) (kEqH+/ha/year)			Existing acid deposition (kEqH+/ha/year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			CLMaxS	CLMinN	CLMaxN	Existing deposition (N)	Existing deposition (S)				
H1	Chiltern Beechwoods SAC	Short	4.000	0.900	4.900	1.30	0.10	0.001	1.40	0.03%	29%
		Tall	10.800	0.100	11.000	2.20	0.20	0.003	2.40	0.03%	22%
H2	Aylesbury Sewage Works LWS	Short	1.610	0.438	2.048	1.39	0.13	0.789	2.31	38.5%	113%
		Tall	2.509	0.357	2.866	2.50	0.16	1.579	4.24	55.1%	148%

Table 11: Modelled nitrogen deposition at assessed protected conservation areas

Ref	Habitat	Vegetation type (for deposition velocity)	Existing nutrient deposition (kgN/ha-year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			Minimal Critical Load (CL)	Existing deposition				
H1	Chiltern Beechwoods SAC	Short	15	17.64	0.002	17.64	0.01%	118%
		Tall	10	30.80	0.004	30.80	0.04%	308%
H2	Aylesbury Sewage Works LWS	Short	5	19.46	1.018	20.48	20.4%	410%
		Tall	5	35.00	2.036	37.04	40.7%	741%

The results in Table 10 and Table 11 indicate that for acid deposition and nutrient nitrogen deposition, at the assessed Chiltern Beechwoods SAC, the respective PCs are less than 1% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a). For Aylesbury Sewage Works LWS, the respective PCs are less than 100% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

It should be noted acid and nitrogen deposition rates currently exceed their relevant critical loads in the majority of the assessed protected conservation areas. However, this is a relatively common situation at protected conservation areas across the UK due to the high baseline deposition rates.

### 5.3 Sensitivity Analysis

A sensitivity study was undertaken to see how changes to the surface roughness and omission of the buildings in the 2019 model (which predicted the highest annual mean NO<sub>2</sub> concentrations at sensitive human receptor locations and highest 1-hour mean NO<sub>2</sub> concentrations at an off-site location) and 2020 model (which predicted the highest 1-hour mean NO<sub>2</sub> concentrations at sensitive human receptors) may impact on predicted concentrations at sensitive human receptors and off-site locations. The results of the sensitivity analysis are presented in Table 12, Table 13 and Table 14.

Table 12: Sensitivity analysis - fixed surface roughness of 0.1 m

Pollutant	Averaging period	Assessment location	Original PC (surface roughness 0.4 m) (µg/m <sup>3</sup> )	Surface roughness length 0.1 m				
				PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	1.4	1.5	10.1	3.8%	25.1%	0.5%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	42.5	55.6	72.6	27.8%	36.3%	6.5%
		Sensitive locations	18.5	23.7	43.3	11.9%	21.6%	2.6%

The results in Table 12 indicate that the change to maximum predicted annual mean concentrations for NO<sub>2</sub> is negligible when using a surface roughness value of 0.1 m compared to the original value of 0.4 m. For 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at an off-site location and sensitive human receptor location, the PCs were higher when using a reduced surface roughness value of 0.1 m. However, a surface roughness of 0.1 m (representing root crops) is not considered representative of the site and surrounding area.

Table 13: Sensitivity analysis - fixed surface roughness of 1 m

Pollutant	Averaging period	Assessment location	Original PC (surface roughness 0.4 m) ( $\mu\text{g}/\text{m}^3$ )	Surface roughness length 1 m				
				PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	1.4	1.3	9.8	3.1%	24.5%	-0.2%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	42.5	29.4	46.4	14.7%	23.2%	-6.5%
		Sensitive locations	18.5	13.6	33.2	6.8%	16.6%	-2.4%

The results in Table 13 indicate that the change to maximum predicted annual mean concentrations for NO<sub>2</sub> is negligible when using a surface roughness value of 1 m compared to the original value of 0.4 m. For 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at an off-site location and sensitive human receptor location, the PCs were lower when modelling with an increased surface roughness value of 1 m. However, a surface roughness of 1 m (representing a large city centre location with built up areas and tall buildings) is not considered representative of the site and surrounding area.

Table 14: Sensitivity analysis - no buildings

Pollutant	Averaging period	Assessment location	Original PC (with buildings) ( $\mu\text{g}/\text{m}^3$ )	No buildings				
				PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	1.4	1.3	9.8	3.2%	24.5%	-0.1%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	42.5	29.1	46.1	14.5%	23.1%	-6.7%
		Sensitive locations	18.5	14.3	33.9	7.2%	16.9%	-2.1%

The results in Table 14 indicate that the differences between the maximum predicted concentrations with and without the buildings is such that including buildings within the model is the preferred option for this study, to maintain a more realistic, and conservative, approach.

## 6. Conclusions

This report has assessed the potential air quality impacts associated with the operation of the biogas fuelled CHP engine and boilers at the Aylesbury STW. The predicted impacts were assessed against the relevant air quality standards and guidelines for the protection of human health (referred to in the report as EQSs) and protected conservation areas (referred to as critical levels and critical loads).

### Human receptors

The assessment indicates that the predicted modelled off-site concentrations and predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'.

This assessment has been carried out on the assumption that the CHP engine and boilers would operate simultaneously and continuously at maximum load all year. This is a conservative assumption as, in practice, the assessed combustion plant will have periods of shut-down and maintenance and may not always operate at maximum load.

### Protected conservation areas

For critical levels, the results indicate that at the assessed Chiltern Beechwoods SAC, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed Aylesbury Sewage Works LWS, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the relevant long-term environmental standard and their impact can also be described as 'insignificant'.

For the 24-hour mean critical level for NO<sub>x</sub>, the results indicate that at that at the assessed Chiltern Beechwoods SAC, the PC for short-term mean concentrations is less than 10% of the short-term environmental standard for protected conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and can be described as 'insignificant'. For the assessed Aylesbury Sewage Works LWS, the short-term NO<sub>x</sub> PC is less than 100% of the short-term environmental standard and can also be described as 'insignificant'.

For acid deposition and nutrient nitrogen deposition, the results indicate that at the assessed Chiltern Beechwoods SAC, the respective PCs are less than 1% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a). For the assessed Aylesbury Sewage Works LWS, the respective PCs are less than 100% of the relevant long-term environmental standard for protected conservation areas and the impact can also be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

### Summary

Based on the above assessment, it is concluded that the assessed CHP engine and boilers are acceptable from an air quality perspective.

## 7. References

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## 8. Figures

Figure 1: Approximate site fenceline, modelled stack locations and modelled buildings

Figure 2: Extent of modelled grid, sensitive human receptor locations and AQMA

Figure 3: Assessed protected conservation areas

Figure 4: Annual mean nitrogen dioxide process contributions, 2019 meteorological data

Figure 5: 1-hour mean (99.79<sup>th</sup> percentile) nitrogen dioxide process contributions, 2019 meteorological data

Figure 6: 1-hour mean (99.73<sup>rd</sup> percentile) sulphur dioxide process contributions, 2019 meteorological data

Figure 7: 15-minute mean (99.9<sup>th</sup> percentile) sulphur dioxide process contributions, 2019 meteorological data

















## Appendix A. Dispersion Model Input Parameters

### A.1 Emission Parameters

The emissions data used to represent the site for the scenario described in Section 2 is set out in Table A.1. Emission limits as set out in the MCPD<sup>2</sup> for existing combustion plant are also presented in Table A.1 where relevant.

Table A.1 Dispersion modelling parameters

Parameters	Unit	CAT CHP engine (0.94 MW <sub>th</sub> )	Strebel auxiliary boiler (0.67 MW <sub>th</sub> )	Strebel auxiliary boiler (0.67 MW <sub>th</sub> )
Modelled fuel	-	Biogas	Biogas	Biogas
Emission point	-	A1	A2	A3
Assessed operation hours	Hours	8,760	8,760	8,760
Stack location	m	E 478968 N 214626	E 478958 N 214606 <sup>4</sup>	E 478960 N 214608 <sup>4</sup>
Stack position	-	Horizontal	Vertical	Vertical
Stack height	m	6.71	8.50	8.50
Stack diameter	m	0.30	0.30	0.30
Effective stack diameter	M	3.88 <sup>2</sup>	-	-
Flue gas temperature	°C	174	152	152
Efflux velocity	m/s	16.7	10.1	10.1
Effective velocity	m/s	0.1 <sup>3</sup>	-	-
Moisture content of exhaust gas	%	9.1	8.1	8.1
Oxygen content of exhaust gas (dry)	%	7.9	6.4	6.4
Volumetric flow rate (actual)	m <sup>3</sup> /s	1.181	0.715	0.715
Volumetric flow rate (normal) <sup>1</sup>	Nm <sup>3</sup> /s	1.445	0.341	0.341
NO <sub>x</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	241 (190 after 1 <sup>st</sup> January 2030)	250 (250 after 1 <sup>st</sup> January 2030)	250 (250 after 1 <sup>st</sup> January 2030)
NO <sub>x</sub> emission rate	g/s	0.348	0.085	0.085
CO emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	557	100	100
CO emission rate	g/s	0.804	0.034	0.034
PM <sub>10</sub> / PM <sub>2.5</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	2.7	5	5
PM <sub>10</sub> / PM <sub>2.5</sub> emission rate	g/s	0.004	0.002	0.002
SO <sub>2</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	130 (60 after 1 <sup>st</sup> January 2030)	200 (60 after 1 <sup>st</sup> January 2030)	200 (60 after 1 <sup>st</sup> January 2030)
SO <sub>2</sub> emission rate	g/s	0.188	0.068	0.068
TVOC emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	649	1,126	1,126
TVOC emission rate	g/s	0.938	0.384	0.384

Note 1: Normalised flows and concentrations presented at 273 K, 101.3 kPa, dry gas and oxygen content of 15% (CHP engine) or 3% (boilers).

Note 2: Due to the CHP engine having a horizontal stack, an effective stack diameter for the CHP engine was calculated based on the 0.1 m/s vertical velocity (see Note 3) and actual flow rate of the CHP engine.

Note 3: Efflux velocity applied in model was 0.1 m/s based on the CHP engine having a horizontal stack.

Note 4: As the boiler stacks are in close proximity, an aai file was used in the model to represent the effects of a single plume.

## A.2 Dispersion Model Inputs

### A.2.1 Structural influences on dispersion

The main structures within the site which have been included in the model to reflect the existing site layout are identified within Table A.2. A sensitivity study has been carried out to assess the sensitivity of the model to using the buildings module.

Table A.2 Modelled building parameters

Building	Modelled building shapes	Length / diameter (m)	Width (m)	Height (m)	Angle of length to north	Centre point co-ordinates	
						Easting	Northing
Building 1	Rectangular	12.50	12.20	6.00	45	478956	214614
Building 2 <sup>1</sup>	Rectangular	7.50	5.40	3.70	45	478969	214622
Building 3	Rectangular	5.60	5.40	6.00	45	478964	214618
Tank 1	Circular	11.80	-	3.80	-	478974	214615
Tank 2	Circular	12.00	-	3.80	-	478961	214628
Primary digesters	Circular	17.40	-	10.50	-	478931	214621
Tank 4	Circular	5.40	-	3.90	-	478963	214603
Raw sludge PS	Rectangular	12.80	8.40	4.40	45	478971	214652
Workshop and garages	Rectangular	44.20	8.40	6.00	134.5	478993	214575
Gas holder	Circular	15.20	15.20	10.70	-	478939	214654
Primary digesters	Circular	13.00	-	15.10	-	478916	214634
Raw sludge blending tanks	Circular	11.30	-	2.60	-	478982	214640
Raw sludge blending tanks	Circular	11.30	-	2.60	-	478991	214631

Note 1: Modelled as the main building

### A.2.2 Other Model Inputs

Table A.3: Other model inputs applied

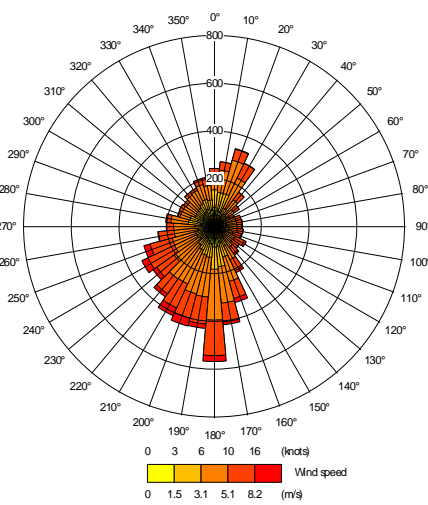
Parameter	Value used	Comments
Surface roughness length for dispersion site	0.4 m	This is appropriate for the dispersion site where the local land-use ranges from parkland to open suburbia. A sensitivity study has been carried out with fixed surface roughness values of 0.1 m and 1.0 m.
Surface roughness length at meteorological station site	0.4 m	This is appropriate for an area where the local land-is relatively flat such as at RAF Benson.
Minimum Monin-Obukhov Length	1 m	Typical values for the dispersion site
Surface Albedo	0.23 m	Typical values for the dispersion site
Priestley-Taylor Parameter	1 m	Typical values for the dispersion site
Terrain	Not included	Guidance for the use of the ADMS model suggests that terrain is normally incorporated within a modelling study when the gradient exceeds 1:10. As the gradient in the vicinity of the site does not exceed 1:10, a terrain file was not included in the modelling.

Parameter	Value used	Comments
Meteorological data	RAF Benson meteorological station, 2016 - 2020	RAF Benson meteorological station is located approximately 28.5 km southwest of the site and is considered the closest most representative meteorological monitoring station to the site.
Combined flue option	Yes	As the boiler stacks are in close proximity to each other, an aai file was used in the model to represent the effects of a single plume.

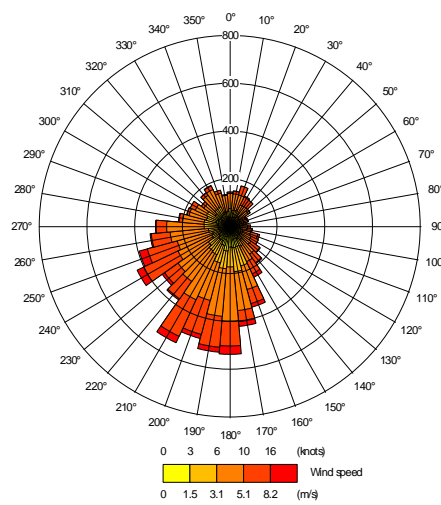
### A.2.3 Meteorological Data – Wind Roses

The wind roses for each year of meteorological data utilised in the assessment are shown below.

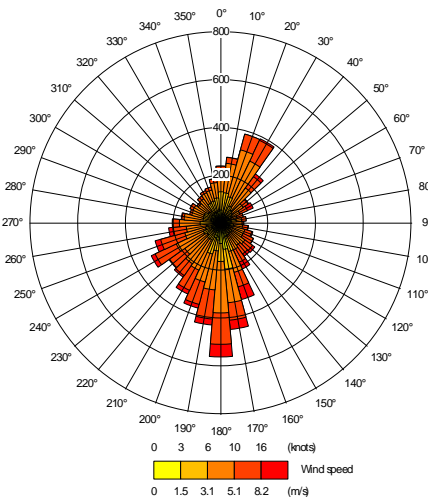
RAF Benson meteorological station, 2016



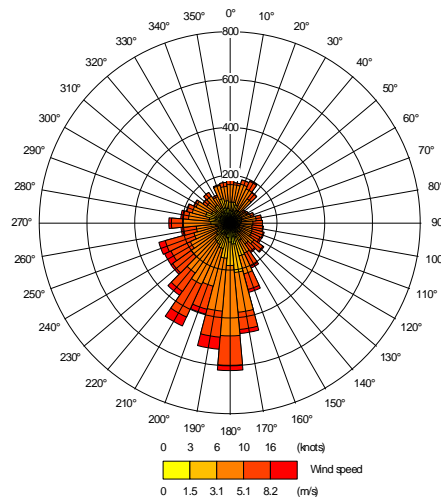
RAF Benson meteorological station, 2017



RAF Benson meteorological station, 2018

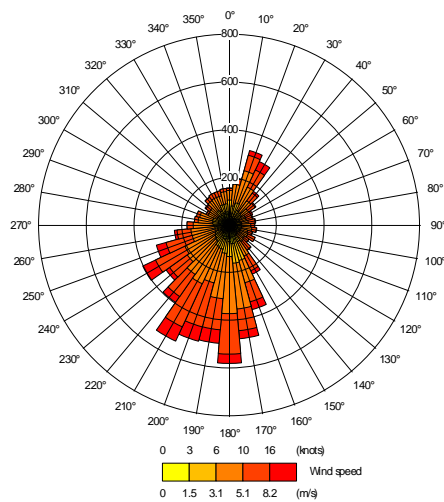


RAF Benson meteorological station, 2019





RAF Benson meteorological station, 2020



A.2.4 Model Domain/Study Area

The ADMS model calculates the predicted concentrations based on a user defined grid system. Generally, the larger the study area, the greater the distance between the grid calculation points and the lower the resolution of the dispersion model predictions. This is to be offset against the need to encompass an appropriately wide area within the dispersion modelling study to capture the dispersion of the stack emissions.

The modelled grid was specified as a 1.5 km x 1.5 km grid with calculation points every 10 m (i.e. 151 points along each grid axis) with a grid height of 1.5 m. This size of grid was selected to provide a good grid resolution and also encompass a sufficient area so that the maximum predicted concentrations would be determined. The area within the site boundary was excluded from the modelled grid as it is not accessible to the general public. The modelled grid parameters are presented in Table A.4

Table A.4: Modelled grid parameters

	Start	Finish	Number of grid points	Grid spacing (m)
Easting	478218	479718	151	10
Northing	213876	215376	151	10
Grid height	1.5	1.5	1	-

Due to the close proximity of Aylesbury Sewage Works LWS to the site, those grid points detailed above which encompass the LWS were used to quantify the maximum long-term and short-term concentrations at ground level.

As well as the modelled grid, the potential impact at 20 sensitive human receptors (e.g. exposure locations such as residential properties and a PRow), an AQMA and two protected conservation areas within the required study area were assessed. The receptor locations are shown in Figure 2 and Figure 3 and further details of the receptor locations are provided in Table A.5 and Table A.6.

Table A.5: Assessed sensitive human receptor locations

Receptor	Description	Grid reference		Distance from CHP engine stack (km)	Direction from CHP engine stack
		Easting	Northing		
R1	Residential property on Pershore Way	479047	215033	0.41	N
R2	Residential property on Moorcroft Lane	479343	215377	0.84	NNE
R3	Residential property on Gogh Road	479349	214825	0.43	ENE
R4	Residential property on Gogh Road	479431	214753	0.48	ENE
R5	Residential property on Rubens Close	479511	214701	0.55	E
R6	Residential property on Meredith Drive	479621	214656	0.65	E
R7	Residential property on Scott End	479745	214571	0.78	E
R8	Residential property on Spruce Road	479391	214175	0.62	SE
R9	Residential property on Spruce Road	479336	214150	0.60	SE
R10	Residential property off Rabans Lane	479081	214394	0.26	SSE
R11	Residential property off Rabans Lane	479060	214439	0.21	SSE
R12	Residential property on Putlowes Drive	478209	215043	0.87	WNW
R13	Residential property on Pondecroft	478604	215580	1.02	NNW
R14	Residential property on Upende	478867	215554	0.93	N
R15	Residential property on Pershore Way	478957	215092	0.47	N
R16	Residential property on Pershore Way	479003	215063	0.44	N
R17	PRoW	479353	214107	0.65	SE
R18	PRoW	479369	214241	0.56	SE
R19	PRoW	479521	214327	0.63	ESE
R20	PRoW	479666	214412	0.73	ESE
Friarage Road AQMA	AQMA	481328	213766	2.51	ESE

Table A.6: Assessed protected conservation area locations

Receptor	Description	Grid reference		Distance from CHP engine stack (km)	Direction from CHP engine stack
		Easting	Northing		
H1	Chiltern Beechwoods SAC	483150	206518	9.12	SSE
H2	Aylesbury Sewage Works LWS	Modelled grid		Adjacent to western and southern boundary of the site	

### A.2.5 Treatment of oxides of nitrogen

It was assumed that 70% of NO<sub>x</sub> emitted from the assessed combustion plant will be converted to NO<sub>2</sub> at ground level in the vicinity of the site, for determination of the annual mean NO<sub>2</sub> concentrations, and 35% of emitted NO<sub>x</sub> will be converted to NO<sub>2</sub> for determination of the hourly mean NO<sub>2</sub> concentrations, in line with guidance provided by the Environment Agency (Environment Agency, 2021b). This approach is likely to overestimate the annual mean NO<sub>2</sub> concentrations considerably at the most relevant assessment locations close to the site.

#### A.2.6 Calculation of PECs

In the case of long-term mean concentrations, it is relatively straightforward to combine modelled process contributions with baseline air quality levels, as long-term mean concentrations due to plant emissions could be added directly to long-term mean baseline concentrations.

It is not possible to add short-period peak baseline and process concentrations directly. This is because the conditions which give rise to peak ground-level concentrations of substances emitted from an elevated source at a particular location and time are likely to be different to the conditions which give rise to peak concentrations due to emissions from other sources.

As described in the Environment Agency guidance (Environment Agency, 2021a), for most substances the short-term peak PC values are added to twice the long-term mean baseline concentration to provide a reasonable estimate of peak concentrations due to emissions from all sources.

#### A.2.7 Modelling Uncertainty

There are always uncertainties in dispersion models, in common with any environmental modelling study, because a dispersion model is an approximation of the complex processes which take place in the atmosphere. Some of the key factors which lead to uncertainty in atmospheric dispersion modelling are as follows.

- The quality of the model output depends on the accuracy of the input data enter the model. Where model input data are a less reliable representation of the true situation, the results are likely to be less accurate.
- The meteorological data sets used in the model are not likely to be completely representative of the meteorological conditions at the site. However, the most suitable available meteorological data was chosen for the assessment.
- Models are generally designed on the basis of data obtained for large scale point sources and may be less well validated for modelling emissions from smaller scale sources.
- The dispersion of pollutants around buildings is a complex scenario to replicate. Dispersion models can take account of the effects of buildings on dispersion; however, there will be greater uncertainty in the model results when buildings are included in the model.
- Modelling does not specifically take into account individual small-scale features such as vegetation, local terrain variations and off-site buildings. The roughness length ( $z_0$ ) selected is suitable to take general account of the typical size of these local features within the model domain.
- To take account of these uncertainties and to ensure the predictions are more likely to be over-estimates than under-estimates, the conservative assumptions described below have been used for this assessment.

#### A.2.8 Conservative Assumptions

The conservative assumptions adopted in this study are summarised below.

- The CHP engine and boilers were assumed to operate simultaneously for 8,760 hours each calendar year but in practice, the CHP engine and boilers will have periods of shut-down and maintenance and may not always operate at maximum load.
- The study is based on emissions being continuously at the emission limits and calculated emissions specified.
- The maximum predicted concentrations at any residential areas as well as off-site locations were considered for the assessment of short-term concentrations and the maximum predicted concentrations at any residential areas were considered for assessment of annual mean concentrations within the air quality study area. Concentrations at other locations will be less than the maximum values presented.

- The highest predicted concentrations obtained using any of the five different years of meteorological data have been used in this assessment. During a typical year the ground level concentrations are likely to be lower.
- It was assumed that 100% of the particulate matter emitted from the plant is in the PM<sub>10</sub> size fraction. The actual proportion will be less than 100%.
- It was assumed that 100% of the particulate matter emitted from the plant is in the PM<sub>2.5</sub> size fraction. The actual proportion will be less than 100%.
- It was assumed the vegetation type selected for each assessed protected conservation area is present at the specific modelled location.

## Appendix B. Calculating Acid and Nitrogen Deposition

### B.1 Methodology

Nitrogen and acid deposition have been predicted using the methodologies presented in the Air Quality Technical Advisory Group (AQTAG) guidance note: AQTAG 06 "Technical Guidance on Detailed Modelling Approach for an Appropriate Assessment for Emissions to Air" (AQTAG, 2014).

When assessing the deposition of nitrogen, it is important to consider the different deposition properties of nitric oxide and nitrogen dioxide. It is generally accepted that there is no wet or dry deposition arising from nitric oxide in the atmosphere. Thus, it is normally necessary to distinguish between nitric oxide (NO) and nitrogen dioxide in a deposition assessment. In this case, the conservative assumption that 70% of the oxides of nitrogen are in the form of nitrogen dioxide was adopted.

Information on the existing nitrogen and acid deposition was obtained from the APIS database (Centre for Ecology and Hydrology, 2021). Information on the deposition critical loads for each habitat site was also obtained from the APIS database using the Site Relevant Critical Load function.

The annual dry deposition flux can be obtained from the modelled annual average ground level concentration via use of the formula:

$$\text{Dry deposition flux } (\mu\text{g}/\text{m}^2/\text{s}) = \text{ground level concentration } (\mu\text{g}/\text{m}^3) \times \text{deposition velocity } (\text{m}/\text{s})$$

(where  $\mu\text{g}$  refers to  $\mu\text{g}$  of the chemical species under consideration).

The deposition velocities for various chemical species recommended for use (AQTAG, 2014) are shown below in Table B.1.

Table B.1: Recommended dry deposition velocities

Chemical species	Recommended deposition velocity (m/s)	
NO <sub>2</sub>	Grassland (short)	0.0015
	Forest (tall)	0.003
SO <sub>2</sub>	Grassland (short)	0.012
	Forest (tall)	0.024

To convert the dry deposition flux from units of  $\mu\text{g}/\text{m}^2/\text{s}$  (where  $\mu\text{g}$  refers to  $\mu\text{g}$  of the chemical species) to units of kg N/ha/yr (where kg refers to kg of nitrogen) multiply the dry deposition flux by the conversion factors shown in Table B.2. To convert dry deposition flux to acid deposition multiply by factors shown in Table B.3.

Table B.2: Dry deposition flux conversion factors for nutrient nitrogen deposition

$\mu\text{g}/\text{m}^2/\text{s}$ of species	Conversion factor to kg N/ha/yr
NO <sub>2</sub>	95.9

Table B.3: Dry deposition flux conversion factors for acidification

$\mu\text{g}/\text{m}^2/\text{s}$ of species	Conversion factor to keq/ha/yr
NO <sub>2</sub>	6.84
SO <sub>2</sub>	9.84

## Appendix C. Results at Sensitive Human Locations

Table C.1: Results of detailed assessment at sensitive human receptor locations for maximum 8-hour mean and 1-hour mean CO predicted concentrations

Receptor ID	Baseline air quality level ( $\mu\text{g}/\text{m}^3$ )	Maximum 8-hour running mean					Maximum 1-hour mean				
		EQS ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)	EQS ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)
R1	248	10,000	76.3	324	0.8%	3.2%	30,000	136.5	384	0.5%	1.3%
R2	248		24.9	273	0.2%	2.7%		58.7	307	0.2%	1.0%
R3	253		43.8	297	0.4%	3.0%		129.7	383	0.4%	1.3%
R4	253		50.9	304	0.5%	3.0%		118.4	372	0.4%	1.2%
R5	253		39.5	293	0.4%	2.9%		99.3	353	0.3%	1.2%
R6	253		39.3	293	0.4%	2.9%		82.3	336	0.3%	1.1%
R7	253		29.4	283	0.3%	2.8%		68.5	322	0.2%	1.1%
R8	253		24.7	278	0.2%	2.8%		65.5	319	0.2%	1.1%
R9	253		31.8	285	0.3%	2.9%		65.5	319	0.2%	1.1%
R10	253		87.7	341	0.9%	3.4%		152.4	406	0.5%	1.4%
R11	253		121.3	375	1.2%	3.7%		170.7	424	0.6%	1.4%
R12	222		50.5	273	0.5%	2.7%		50.7	273	0.2%	0.9%
R13	222		25.4	247	0.3%	2.5%		49.7	272	0.2%	0.9%
R14	222		57.6	280	0.6%	2.8%		59.0	281	0.2%	0.9%
R15	222		97.2	319	1.0%	3.2%		130.0	352	0.4%	1.2%
R16	248		61.8	310	0.6%	3.1%		140.6	389	0.5%	1.3%
R17	253		28.8	282	0.3%	2.8%		62.1	315	0.2%	1.1%
R18	253		42.3	296	0.4%	3.0%		70.3	324	0.2%	1.1%
R19	253		31.9	285	0.3%	2.9%		75.3	329	0.3%	1.1%
R20	253		23.5	277	0.2%	2.8%		70.5	324	0.2%	1.1%

Table C.2: Results of detailed assessment at sensitive human receptor locations for annual mean and 1-hour mean (99.79th percentile) NO2 predicted concentrations

Receptor ID	Annual mean						99.79 <sup>th</sup> percentile of 1-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	8.5	40	1.35	9.9	3.4%	24.7%	200	17.0	13.0	30.0	6.5%	15.0%
R2	8.5		0.42	8.9	1.1%	22.4%		17.0	6.8	23.8	3.4%	11.9%
R3	9.8		0.87	10.6	2.2%	26.6%		19.5	11.9	31.4	5.9%	15.7%
R4	9.8		0.70	10.5	1.7%	26.2%		19.5	11.9	31.5	6.0%	15.7%
R5	9.8		0.55	10.3	1.4%	25.8%		19.5	8.1	27.6	4.0%	13.8%
R6	9.8		0.41	10.2	1.0%	25.4%		19.5	6.3	25.8	3.1%	12.9%
R7	9.8		0.30	10.1	0.8%	25.2%		19.5	5.5	25.0	2.8%	12.5%
R8	9.8		0.24	10.0	0.6%	25.0%		19.5	5.0	24.6	2.5%	12.3%
R9	9.8		0.26	10.0	0.6%	25.0%		19.5	5.1	24.6	2.5%	12.3%
R10	9.8		0.95	10.7	2.4%	26.8%		19.5	14.8	34.3	7.4%	17.1%
R11	9.8		1.35	11.1	3.4%	27.8%		19.5	18.5	38.0	9.3%	19.0%
R12	8.0		0.11	8.1	0.3%	20.2%		15.9	2.9	18.8	1.5%	9.4%
R13	8.0		0.25	8.2	0.6%	20.5%		15.9	5.0	20.9	2.5%	10.4%
R14	8.0		0.44	8.4	1.1%	21.0%		15.9	6.4	22.3	3.2%	11.2%
R15	8.0		1.21	9.2	3.0%	22.9%		15.9	13.6	29.5	6.8%	14.7%
R16	8.5		1.31	9.8	3.3%	24.6%		17.0	11.7	28.7	5.8%	14.4%
R17	9.8		0.23	10.0	0.6%	25.0%		19.5	4.6	24.1	2.3%	12.1%
R18	9.8		0.28	10.0	0.7%	25.1%		19.5	5.7	25.2	2.8%	12.6%
R19	9.8		0.27	10.0	0.7%	25.1%		19.5	5.4	24.9	2.7%	12.5%
R20	9.8		0.26	10.0	0.6%	25.1%		19.5	4.8	24.4	2.4%	12.2%
Friarage Road AQMA	-		0.05	-	0.1%	-	n/a					



Table C.3: Results of detailed assessment at sensitive human receptor locations for 24-mean (99.18th percentile) and 1-hour mean (99.73rd percentile) SO2 predicted concentrations

Receptor ID	99.18 <sup>th</sup> percentile of 24-hour mean						99.73 <sup>rd</sup> percentile of 1-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	6.9	125	5.1	12.0	4.0%	9.6%	350	6.9	19.8	26.7	5.7%	7.6%
R2	6.9		1.7	8.6	1.3%	6.9%		6.9	10.3	17.2	2.9%	4.9%
R3	8.7		4.0	12.7	3.2%	10.2%		8.7	17.5	26.2	5.0%	7.5%
R4	8.7		3.5	12.2	2.8%	9.7%		8.7	17.7	26.4	5.1%	7.5%
R5	8.7		2.8	11.5	2.2%	9.2%		8.7	12.3	21.0	3.5%	6.0%
R6	8.7		2.4	11.0	1.9%	8.8%		8.7	10.0	18.7	2.9%	5.3%
R7	8.7		2.2	10.8	1.7%	8.7%		8.7	8.6	17.3	2.5%	4.9%
R8	8.7		2.1	10.7	1.7%	8.6%		8.7	7.7	16.4	2.2%	4.7%
R9	8.7		2.2	10.9	1.8%	8.7%		8.7	8.2	16.9	2.3%	4.8%
R10	8.7		9.6	18.2	7.6%	14.6%		8.7	23.8	32.4	6.8%	9.3%
R11	8.7		13.3	22.0	10.7%	17.6%		8.7	29.2	37.9	8.4%	10.8%
R12	6.7		1.3	8.0	1.0%	6.4%		6.7	4.4	11.2	1.3%	3.2%
R13	6.7		1.6	8.3	1.2%	6.6%		6.7	7.5	14.3	2.2%	4.1%
R14	6.7		1.8	8.5	1.4%	6.8%		6.7	9.2	16.0	2.6%	4.6%
R15	6.7		4.9	11.7	4.0%	9.3%		6.7	17.3	24.0	4.9%	6.9%
R16	6.9		5.0	11.9	4.0%	9.5%		6.9	16.7	23.6	4.8%	6.7%
R17	8.7		2.1	10.8	1.7%	8.6%		8.7	7.5	16.2	2.1%	4.6%
R18	8.7		2.4	11.1	1.9%	8.8%		8.7	8.8	17.5	2.5%	5.0%
R19	8.7		2.6	11.2	2.1%	9.0%		8.7	8.6	17.2	2.4%	4.9%
R20	8.7		2.2	10.9	1.8%	8.7%		8.7	7.4	16.0	2.1%	4.6%

Table C.4: Results of detailed assessment at sensitive human receptor locations for 15-minute mean (99.9th percentile) SO2 predicted concentrations

Receptor ID	99.9 <sup>th</sup> percentile of 15-minute mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	6.9	266	34.6	41.5	13.0%	15.6%
R2	6.9		19.9	26.8	7.5%	10.1%
R3	8.7		38.0	46.7	14.3%	17.5%
R4	8.7		31.8	40.4	11.9%	15.2%
R5	8.7		26.4	35.1	9.9%	13.2%
R6	8.7		19.0	27.6	7.1%	10.4%
R7	8.7		20.5	29.2	7.7%	11.0%
R8	8.7		16.5	25.2	6.2%	9.5%
R9	8.7		15.9	24.5	6.0%	9.2%
R10	8.7		32.9	41.6	12.4%	15.6%
R11	8.7		41.3	50.0	15.5%	18.8%
R12	6.7		8.1	14.8	3.0%	5.6%
R13	6.7		20.0	26.7	7.5%	10.1%
R14	6.7		24.2	30.9	9.1%	11.6%
R15	6.7		40.2	47.0	15.1%	17.7%
R16	6.9		32.3	39.2	12.2%	14.7%
R17	8.7		15.5	24.2	5.8%	9.1%
R18	8.7		14.8	23.4	5.5%	8.8%
R19	8.7		17.9	26.6	6.7%	10.0%
R20	8.7		16.4	25.1	6.2%	9.4%

Table C.5: Results of detailed assessment at sensitive human receptor locations for annual mean and 24-hour mean (90.41st percentile) PM<sub>10</sub> predicted concentrations

Receptor ID	Annual mean						90.41 <sup>st</sup> percentile of 24-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	14.7	40	0.03	14.7	0.07%	36.7%	50	29.3	0.07	29.4	0.1%	58.8%
R2	14.7		0.01	14.7	0.02%	36.7%		29.3	0.02	29.3	0.0%	58.7%
R3	14.5		0.02	14.5	0.05%	36.4%		29.1	0.05	29.1	0.1%	58.2%
R4	14.5		0.01	14.5	0.04%	36.4%		29.1	0.04	29.1	0.1%	58.2%
R5	14.5		0.01	14.5	0.03%	36.3%		29.1	0.03	29.1	0.1%	58.2%
R6	14.5		0.01	14.5	0.02%	36.3%		29.1	0.03	29.1	0.1%	58.2%
R7	14.5		0.01	14.5	0.02%	36.3%		29.1	0.02	29.1	0.0%	58.1%
R8	14.5		0.01	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.1%
R9	14.5		0.01	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.2%
R10	14.5		0.02	14.5	0.05%	36.4%		29.1	0.08	29.1	0.2%	58.3%
R11	14.5		0.03	14.6	0.07%	36.4%		29.1	0.11	29.2	0.2%	58.3%
R12	14.4		0.00	14.4	0.01%	35.9%		28.7	0.01	28.7	0.0%	57.4%
R13	14.4		0.01	14.4	0.01%	35.9%		28.7	0.02	28.7	0.0%	57.5%
R14	14.4		0.01	14.4	0.02%	35.9%		28.7	0.03	28.7	0.1%	57.5%
R15	14.4		0.03	14.4	0.06%	36.0%		28.7	0.07	28.8	0.1%	57.6%
R16	14.7		0.03	14.7	0.07%	36.7%		29.3	0.07	29.4	0.1%	58.8%
R17	14.5		0.00	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.1%
R18	14.5		0.01	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.2%
R19	14.5		0.01	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.1%
R20	14.5		0.01	14.5	0.01%	36.3%		29.1	0.02	29.1	0.0%	58.1%

Table C.6: Results of detailed assessment at sensitive human receptor locations for annual mean PM<sub>2.5</sub> predicted concentrations

Receptor ID	Annual mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	9.4	25	0.03	9.5	0.1%	37.9%
R2	9.4		0.01	9.5	0.0%	37.8%
R3	10.0		0.02	10.0	0.1%	40.0%
R4	10.0		0.01	10.0	0.1%	39.9%
R5	10.0		0.01	10.0	0.0%	39.9%
R6	10.0		0.01	10.0	0.0%	39.9%
R7	10.0		0.01	10.0	0.0%	39.9%
R8	10.0		0.01	10.0	0.0%	39.9%
R9	10.0		0.01	10.0	0.0%	39.9%
R10	10.0		0.02	10.0	0.1%	40.0%
R11	10.0		0.03	10.0	0.1%	40.0%
R12	9.1		0.00	9.1	0.0%	36.5%
R13	9.1		0.01	9.1	0.0%	36.5%
R14	9.1		0.01	9.1	0.0%	36.5%
R15	9.1		0.03	9.1	0.1%	36.5%
R16	9.4		0.03	9.5	0.1%	37.9%
R17	10.0		0.00	10.0	0.0%	39.9%
R18	10.0		0.01	10.0	0.0%	39.9%
R19	10.0		0.01	10.0	0.0%	39.9%
R20	10.0		0.01	10.0	0.0%	39.9%

Table C.7: Results of detailed assessment at sensitive human receptor locations for annual mean and maximum 1-hour mean TVOC predicted concentrations

Receptor ID	Annual mean						100 <sup>th</sup> percentile of 1-hour mean					
	Baseline air quality level	EQS ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)	EQS ( $\mu\text{g}/\text{m}^3$ )	Baseline air quality level	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)
R1	n/a		6.1	n/a			n/a		167.0	n/a		
R2			1.9						78.3			
R3			3.9						158.7			
R4			3.2						142.8			
R5			2.5						124.3			
R6			1.9						106.4			
R7			1.4						89.4			
R8			1.1						95.3			
R9			1.2						99.2			
R10			4.3						201.2			
R11			6.1						215.9			
R12			0.5						68.8			
R13			1.1						74.1			
R14			2.0						80.4			
R15			5.4						161.7			
R16			5.9						171.3			
R17			1.0						95.0			
R18			1.3						100.9			
R19			1.2						100.1			
R20			1.2						91.9			