Bexhill and Hastings Sludge Treatment Centre

Air quality assessment to accompany IED permit application

14 August 2024

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Contents

1 Introduction

1.1 Overview

This report has been prepared to support the Bespoke Installation Permit variation application for Bexhill and Hastings Wastewater Treatment Works (WTW) and Sludge Treatment Centre (STC). An H1 air quality screening assessment has been undertaken for air emissions from the associated Anaerobic Digestion (AD) facility, which identified a potential for exceedances of long term and short-term Environmental Assessment Levels (EALs). Therefore, as specified in the 'Air emissions risk assessment for your environmental permit'[1] guidance, these air emissions cannot be screened out and detailed modelling is required. This Air Quality Assessment report presents the results of detailed modelling of emissions from the combustion of biogas at a Combined Heat and Power (CHP) plant and one auxiliary biogas boiler.

The assessment has accounted for the requirements set out within the 'Air emissions risk assessment for your environmental permit'[1] guidance. As stated in this guidance document, where existing data have not been available, either estimates based on similar operations elsewhere or worst-case estimates have been used to complete the assessment. All assumptions that have been made for these estimates are detailed in this report.

1.2 Site description

Bexhill and Hastings is a WTW and STC (hereafter referred to as the 'Site') owned and operated by Southern Water Services Ltd. The Anaerobic Digestion (AD), which is part of the STC, facility treats indigenously produced and imported sludges. Biogas produced by the AD facility is combusted by the CHP to recover heat and electricity which is used at the Site. If the CHP is not operational, biogas will be combusted via the back-up boiler and/or an on-site flare stack. The combustion plant at the Site consists of:

- One 1.84MWth input CHP plant (MTU 8V4000L62FB), which combusts the biogas produced by the anaerobic digestion facility to generate heat and electricity. All heat and electricity generated is used on site and electricity is not exported to the National Grid.
- One auxiliary biogas boiler which provides heat to the digester, with a thermal input of 1.48MWth. This operates when the CHP plant is not operating.
- One 2.3MWth standby diesel generator which runs the main inlet screen building. It is primarily used for emergency back-up and testing, operational less than 50 hours per year (excluded from the permit application, considered for context only).
- A flare, which is used to burn off excess biogas.

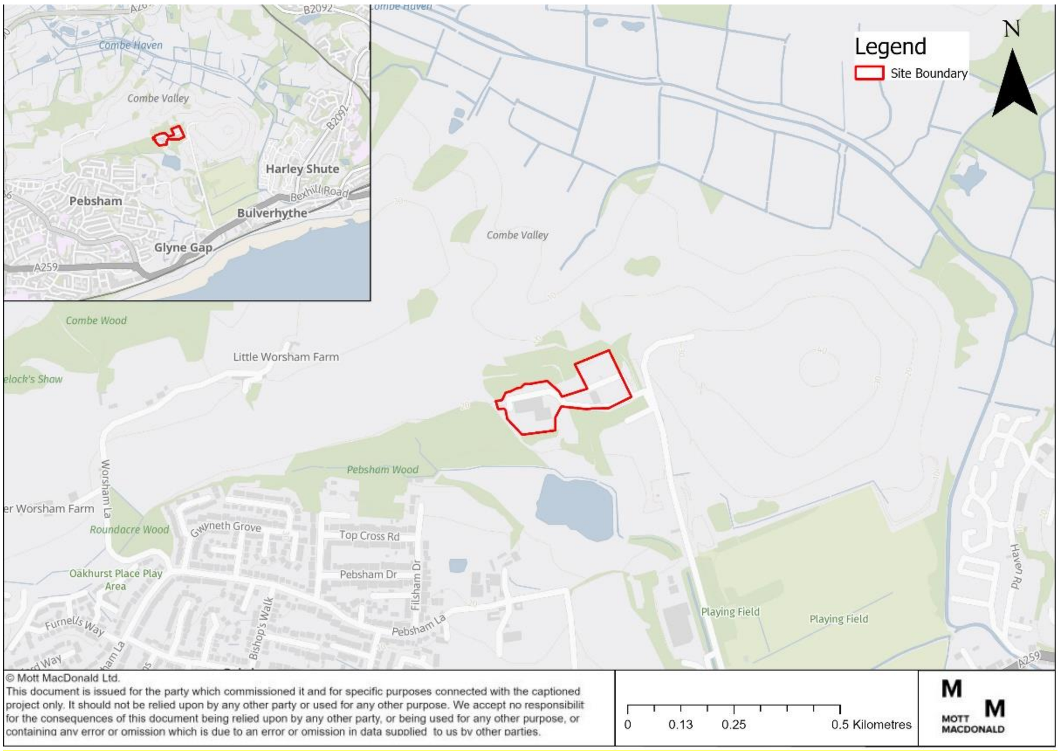
1.3 Site location

The Site address is Bexhill Road, Hastings, East Sussex TN38 8AY. (National Grid Reference: TQ 76590 09381)The Site is within the administrative area of Hastings Borough Council (HBC). The Site is surrounded by the Pebsham Wood to the west, farmland and Combe Haven Site of Special Scientific Interest (SSSI) to the north, Pebsham Farm to the south and playing fields to the south east.

[1] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

The nearest high sensitivity human health receptors to the Site are residential dwellings at Pebsham Farm House approximately 400m to the south west of the site boundary. Figure 1.1 shows the location of the Site and the extent of the Site boundary.

Figure 1.1: Site location



1.4 Summary of key pollutants

This assessment has considered emissions of oxides of nitrogen (NO_x), volatile organic compounds (VOCs) and sulphur dioxide (SO_2). These are the key pollutants of potential concern, given that the main fuel used on the Site is biogas.

The following sub-sections present a brief description of the key pollutants referred to above and their behaviour in the atmosphere.

1.4.1 Oxides of nitrogen

Oxides of nitrogen is a term used to describe a mixture of nitric oxide (NO) and nitrogen dioxide (NO_2), referred to collectively as NOx. These are primarily formed from atmospheric and fuel nitrogen as a result of high temperature combustion. The most important sources in the UK are road traffic and power generation.

During the process of combustion, atmospheric and fuel nitrogen is partially oxidised via a series of complex reactions to NO. The process is dependent on the temperature, pressure, oxygen concentration and residence time of the combustion gases in the combustion zone. Most NOx exhausted from a combustion process is in the form of NO, which is a colourless and tasteless gas. It is readily oxidised to NO_2, a more harmful form of NOx, by a chemical reaction with ozone and other chemicals in the atmosphere. NO_2 is a yellowish-orange to reddish-brown gas with a pungent, irritating odour and is a strong oxidant.

1.4.2 Sulphur dioxide

SO_2 is a colourless, non-flammable gas with a penetrating odour that can irritate the eyes and air passages. It reacts on the surface of a variety of airborne solid particles, is soluble in water and can be oxidised within airborne water droplets. The most common sources of SO_2 include fossil fuel (coal and oil) combustion, smelting, manufacture of sulphuric acid, conversion of wood pulp to paper, incineration of waste and production of elemental sulphur. The most common natural source of SO_2 is volcanoes.

1.4.3 Volatile organic compounds

Volatile organic compounds (VOCs) are a collection of organic chemical compounds that have high enough vapour pressures under normal conditions to significantly vaporize and enter the atmosphere. A wide range of carbon-based molecules, such as aldehydes, ketones, and other light hydrocarbons are VOCs. Common artificial VOCs include paint thinners, dry cleaning solvents, and some constituents of fuels (e.g. petrol and natural gas).

The VOCs which are harmful to health are known as non-methane VOCs (NMVOC) as they do not contain methane (CH4). Examples of NMVOCs include benzene, formaldehyde and acetone which can be produced during combustion, agricultural practices and from the use of solvents.

For the purpose of this assessment, only benzene has been considered as this is the VOC for which relevant Environmental Quality Standards exist. It has been assumed that 100% of the VOCs emitted from the combustion plant will be benzene.

2 Legislative context

2.1 Overview

This section summarises the relevant international and national legislation, policy and guidance in relation to air quality at the Site.

2.2 England

The Air Quality Standards Regulations 2010[2], Air Quality Standards (amendment) Regulations 2016[3], Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019[4] and Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020[5] implement the EU's Directive 2008/50/EC on ambient air quality.

Part IV of the Environment Act 1995[6] (as amended in Schedule 11 of the Environment Act 2021[7]) requires that every local authority shall carry out a review of air quality within its designated area. Local authorities have to consider and assess whether current and forecasted air quality levels in their areas are likely to exceed the objectives set out in the Air Quality (England) Regulations 2000[8] and the Air Quality (England) (Amendment) Regulations 2002[9].The objectives that are set out in these regulations are, in most cases, numerically synonymous with the limit values specified within the legislation, although compliance dates differ. Where an area exceeds an air quality objective, an Air Quality Management Area (AQMA) must be declared and an Air Quality Action Plan (AQAP) must be prepared to specify and implement measures to improve air quality.

The Environment Act 1995 requires the UK Government to produce a national 'Air Quality Strategy' (AQS). The AQS establishes the UK framework for air quality improvements. Measures agreed at the national and international level are the foundations on which the strategy is based. The first Air Quality Strategy was adopted in 1997.

The UK Government revised its national Air Quality Strategy[10] in 2023. This revision replaces the 2007 strategy and compliments the Clean Air Strategy 2019 (CAS). The 2023 revision sets out the actions the government expects local authorities in England to take in support of achieving the Government's long-term air quality goals.

Although the CAS does not set legally binding objectives, the CAS instead has targets for reducing total UK emissions of NOx from sectors such as road transport, domestic sources and industry.

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[2] Statutory Instrument. (2010), 'The Environmental Permitting (England and Wales) Regulations', Queen's Printer of Acts of Parliament.

[3] Statutory Instrument (2016) The Air Quality Standards (Amendment) Regulations, No. 1184.

[4] Statutory Instrument (2019) Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations., No. 74.

[5] Statutory Instrument. (2020) Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020, No. 1313.

[6] Department for Environment Food and Rural Affairs. (2009). Part IV of the Environment Act 1995 Local Air Quality Management Policy Guidance (PG09). London: Defra.

[7] Statutory Instrument. (2021) Chapter 30, Schedule 11 Local Air Quality Management Framework of Environment Act 2021

[8] Statutory Instrument. (2000), 'Air Quality (England) Regulations', No. 928. UK statutory instrument

[9] Statutory Instrument. (2002), 'Air Quality (England) (Amendment) Regulations', No. 3043. UK statutory instrument

[10] Draft revised Air Quality Strategy available at https://consult.defra.gov.uk/air-quality-strategy-review-team/consultation-on-the-draft-revised-air-quality-stra/ [last accessed 21st April 2023]

2.3 Permitting requirements and associated guidance

2.4 Overview

Depending on the potential level of risk to air quality, the preparation of a permit application can include the requirement for an air quality assessment. Key guidance issued by the EA to assist with undertaking an air quality assessment for an environmental permit includes:

- Air emissions risk assessment for your environmental permit[11]
- Environmental permitting: air dispersion modelling reports[12]
- Specified generators: dispersion modelling assessment guidance[13]
- Technical guidance on detailed modelling approach for an appropriate assessment for emissions to air[14]

2.4.1 Permitting requirements at the Site

Southern Water is applying to vary the existing Environmental Permit EPR/KP3630KV into a Bespoke Installation Permit for the STC waste activity. This is because a joint EA and DEFRA decision has been made that Anaerobic Digestion (AD) treatment facilities at WTW STCs are covered by the Industrial Emissions Directive and can no longer operate under standard environmental permits or exemptions.

The primary permitted installation activity will be the AD treatment facility. The AD facility will treat indigenously produced and imported sludges. Permitted Directly Associated Activities will be the import of waste from other WTW assets; the physio-chemical treatment of imported and indigenously produced sludges; the storage of indigenously produced sludges, imported sludges and the sludge cake from the AD facility; the storage of biogas derived from the AD treatment of waste and the combustion of biogas in an on-site Combined Heat and Power plant (CHP). In the event the CHP cannot run in an emergency or due to operational issues, biogas will be combusted via an on-site flare stack and/or back-up boiler system.

With the changes in the Environmental Permitting Regulations due after 2023, fats, oil and grease and food wastes will be treated (in the future) in the AD facility and co-digested to improve the quality of cake produced and the biogas yields produced for combustion in the on-site CHP.

2.4.2 Assessment criteria

The following section presents the relevant air quality standards that are applicable to the Site. These are collectively described as the Environmental Quality Standards (EQS).

The EA's risk assessment guidance[15] provides guidelines on Ambient Air Directive (AAD) limit values, UK air quality objectives and environmental assessment levels (EALs) that the impact

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[11] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

[12] Environment Agency, 2014. Environmental permitting: air dispersion modelling reports. Available at: https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports

[13] Environment Agency, 2019. Specified generators: dispersion modelling assessment. Available at: https://www.gov.uk/guidance/specified-generators-dispersion-modelling-assessment

[14] Environment Agency (2006). Technical Guidance on detailed modelling approach for an appropriate assessment for emissions to air: Habitats Directive 2004 (AQTAG 06).

[15] Environment Agency. (2016) 'Air Emissions Risk Assessment for your Environmental Permit'.

should be compared against. Further EQS to assess the potential impact at designated sites are available from the Air Pollution Information System[16] (APIS).

Air quality limit values and objectives

Table 2.1 summarises the AAD limit values and air quality objectives for the pollutants relevant to this assessment.

Table 2.1: Summary of relevant air quality objectives and AAD limit values

Pollutant	Averaging period	Objective / limit value (µg/m³)	Allowance
For the protection of human health			
Nitrogen dioxide (NO_2)	1-hour	200	18 times pcy
	Annual	40	–
Sulphur dioxide (SO_2)	15-minute	266	35 times pcy
	1-hour	350	24 times pcy
	24-hour	125	3 times pcy
VOCs (as benzene)	Annual	5	–
For the protection of vegetation and ecosystems			
Nitrogen oxides (NO_X)	Annual	30	–
Sulphur dioxide (SO_2)	Annual	20	–

Notes: pcy = per calendar year

The limit values apply everywhere with the exception of:

a) Any locations situated within areas where members of the public do not have access and there is no fixed habitation.
b) In accordance with Article 2(1), on factory premises or at industrial installations to which all relevant provisions concerning health and safety at work apply
c) On the carriageway of roads, and
d) On the central reservations of roads except where there is normally pedestrian access to the central reservation.

Table 2.2 provides examples of the locations where the UK air quality objectives apply for the protection of human health. This has been used to define where the AAD limit values and air quality objectives should apply within the assessment.

Table 2.2: Locations where air quality objectives apply

Averaging period	Objectives should apply at:	Objectives should not apply at:
Annual	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.
24 hour	All locations where the annual mean objective would apply, together with hotels. Gardens of residential properties.	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.

[16] UK Air Pollution Information System (APIS) www.apis.ac.uk [last accessed 09/07/2019]

Averaging period	Objectives should apply at:	Objectives should not apply at:
1 hour	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets). Those parts of car parks, bus stations and railway stations etc which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations where members of the public might reasonably be expected to spend one hour or longer.	Kerbside sites where the public would not be expected to have regular access.

Specified generator guidance published by the EA[17] states that the annual and hourly NO_2 objectives should be considered at sensitive receptors where "there is relevant public exposure". Relevant public exposure is defined as a location where members of the public:

- Have access
- Are regularly present, and
- Can be exposed for a significant portion of the averaging time of the standard.

Consequently, the standards do not apply where health and safety at work provisions exist and where members of the public do not have access, such as within the Site boundary.

Environmental Assessment Levels

In addition to the AAD limit values and air quality objectives, the EA risk assessment guidance[18] provides further assessment criteria in the form of Environmental Assessment Levels (EALs). The EALs cover a wide range of pollutants and specify target values for the protection of conservation areas. Any exceedances of these EALs may result in further action needing to be taken to reduce the impact on the environment. EALs applicable to the assessment (also referred to as critical levels in the context of designated sites) are presented in Table 2.3.

Table 2.3: Summary of relevant EALs/critical levels for the protection of human health and ecosystems

Pollutant	Averaging period	EAL/critical level (µg/m³)
For the protection of human health		
VOCs (as benzene)	24 hour	30
For the protection of vegetation and ecosystems		
Nitrogen oxides (NOx)	24 hours	75
	Annual	30*

* Numerically synonymous with the annual AAD limit value

In addition to these EALs, APIS provides targets for nitrogen and acid deposition for specific habitats and species. These EALs, also known as critical loads, are provided for specific habitats within Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSI). Generic critical loads for broad habitat classes across the UK are also available on APIS.

[17] Environment Agency, 2019. Specified generators: dispersion modelling assessment. Available at: https://www.gov.uk/guidance/specified-generators-dispersion-modelling-assessment

[18] Environment Agency. (2016) 'Air Emissions Risk Assessment for your Environmental Permit'.

3 Methodology

3.1 Overview

In accordance with EA risk assessment guidance[19], the approach to the air quality assessment has involved the following key elements:

- Calculation of the environmental concentration of pollutants released to the air (Process Contributions (PC) and Predicted Environmental Concentrations (PEC))
- Identification of whether the PCs and PECs have a significant environmental impact by comparing with the relevant EQS

PECs have been calculated by adding the PC to a representative value for the background concentration. Section 3.2.10 provides further details on the background concentrations used in this assessment.

Detailed modelling has been undertaken to calculate PCs and PECs to determine whether emissions from the Site are significant.

3.2 Modelling approach

3.2.1 Model selection

Commercially available dispersion models are available to predict ground level concentrations arising from emissions to air from elevated point sources.

ADMS is a “new generation” dispersion model, developed by Cambridge Environmental Research Consultants (CERC), which models a wide range of buoyant and passive releases to the atmosphere either individually or in combination. ADMS brings together the results of recent research on dispersion modelling. The model calculates the mean concentration over flat terrain, allowing for the effect of plume rise, complex terrain, buildings, radioactive decay and deposition. The model has been subject to extensive validation. ADMS comprises of a number of individual modules each representing one of the processes contributing to dispersion or an aspect of data input and output. The latest version of the model, ADMS 6.0.0.1, has been used in this assessment.

3.2.2 Buildings

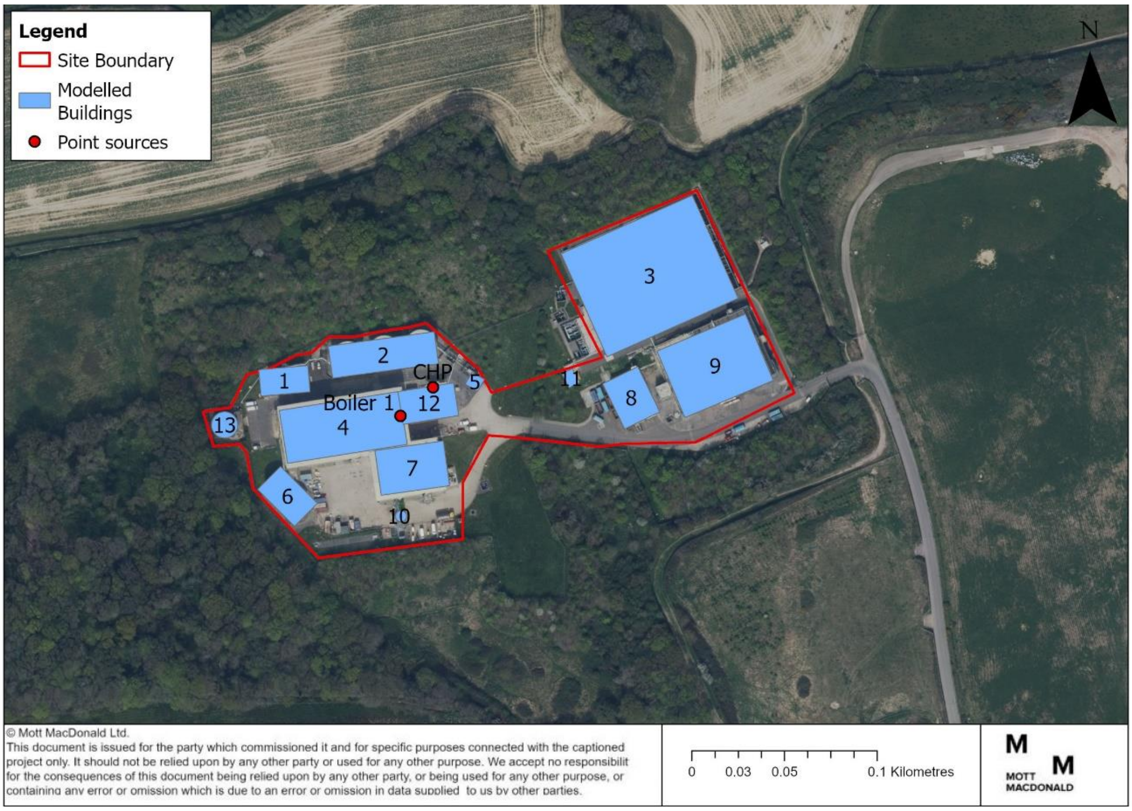
The movement of air over and around buildings generates areas of flow circulation, which can lead to increased ground level concentrations in the building wakes. Where building heights are greater than about 30 - 40% of the stack height, downwash effects can be significant. ADMS includes a building effects module to calculate the dispersion of pollution from sources near large structures. The buildings likely to have a dominant effect (i.e. with the greatest dimensions likely to promote turbulence) which have been included within the model are listed in Table 3.1 and illustrated in Figure 3.1.

[19] Environment Agency. (2016) ‘Air Emissions Risk Assessment for your Environmental Permit’.

Table 3.1: Building dimensions used within the assessment

No.	X (m)	Y (m)	Height (m)	Length (m)	Width (m)	Angle (°)
1	576534	109399	11.5	14.3	26.6	355
2	576587	109413	13.0	57.7	17.5	82
3	576731	109456	3.0	77.6	60.9	66
4	576502	109375	10.0	14.2	14.2	0
5	576566	109374	13.0	65.5	29.0	81
6	576612	109387	5.0	30.4	17.9	261
7	576637	109399	5.5	7.4	7.7	30
8	576536	109337	12.0	17.5	28.2	45
9	576603	109352	16.0	24.4	37.3	172
10	576721	109390	7.0	21.1	27.2	64
11	576767	109407	7.0	51.8	39.0	67
12	576597	109326	9.0	6.0	6.0	0
13	576689	109401	3.0	6.4	8.5	62

Figure 3.1: Building layout



3.2.3 Meteorology

The most important meteorological parameters governing the atmospheric dispersion of pollutants are wind direction, wind speed and atmospheric stability as described below:

- Wind direction determines the sector of the compass into which the plume is dispersed.

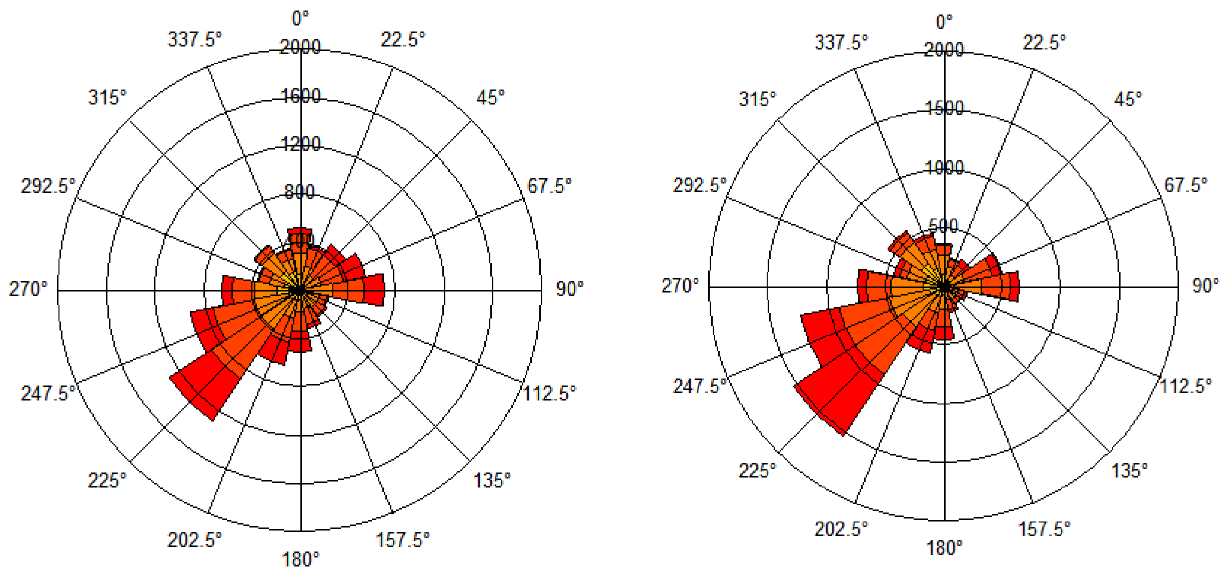
- Wind speed affects the distance the plume travels over time and can affect plume dispersion by increasing the initial dilution of pollutants and inhibiting plume rise.
- Atmospheric stability is a measure of the turbulence of the air, and particularly of its vertical motion. It therefore affects the spread of the plume as it travels away from the source. ADMS uses a parameter known as the Monin-Obukhov length that, together with the wind speed, describes the stability of the atmosphere.

For meteorological data to be suitable for dispersion modelling purposes, parameters need to be measured on an hourly basis. These parameters include wind speed, wind direction, cloud cover and temperature. There are only a limited number of sites where the required meteorological measurements are made.

The year of meteorological data that is used for a modelling assessment can have a significant effect on source contribution concentrations. As recommended by the EA dispersion modelling guidance[20], modelling was undertaken using five years of data. Data from the Lydd meteorological station was used as this was considered the most representative station due to its proximity to the Site (approximately 30km to the north west) and coastal location. Five years of data from 2018 to 2022 were used.

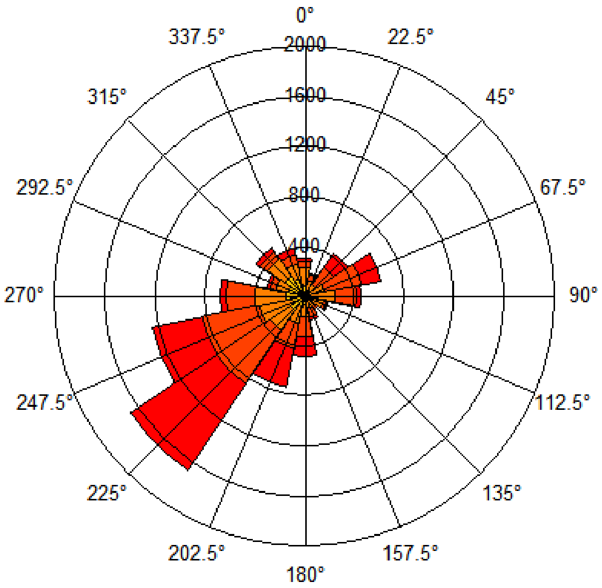
Wind roses have been constructed for each of the five years of meteorological data used in this assessment. The wind roses presented in Figure 3.2 illustrate that in all years there is dominance in winds from the south west.

Figure 3.2: Wind roses for Lydd (2018 – 2022)

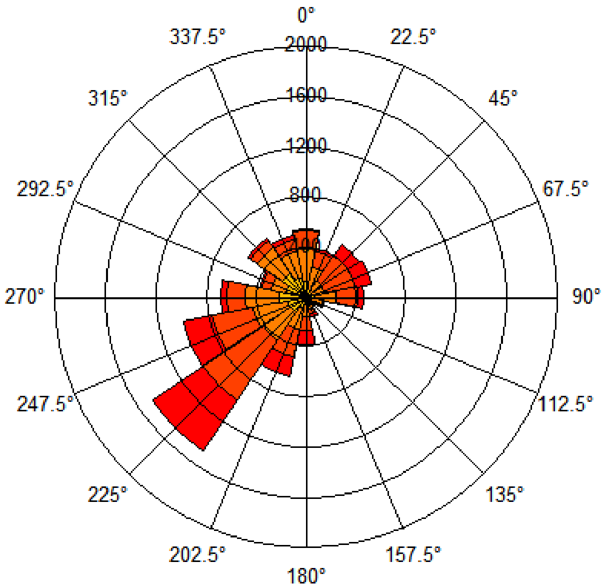


2018 **2019**

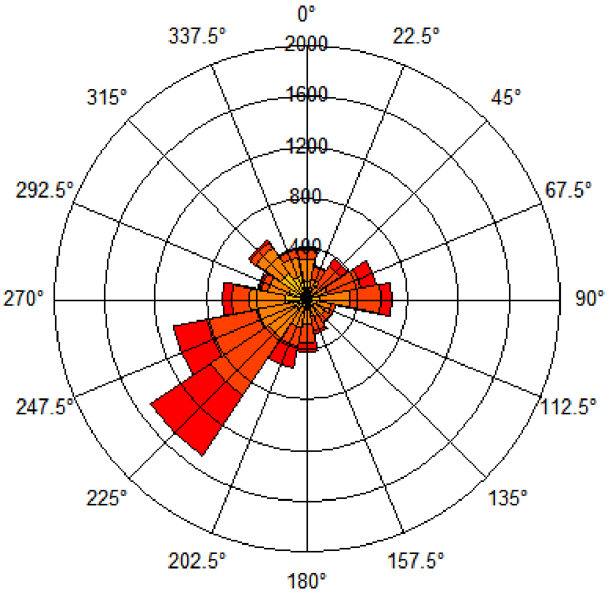
[20] Environment Agency, 2014. Environmental permitting: air dispersion modelling reports. Available at: https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports



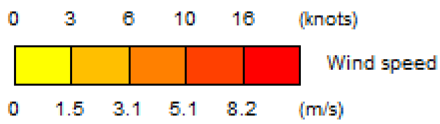
2020



2021



2022



Scale

3.2.4 Terrain

The presence of elevated terrain can significantly affect ground level concentrations of pollutants emitted from elevated sources such as stacks by reducing the distance between the plume centre line and ground level and increasing turbulence and, hence, plume mixing.

Terrain in the vicinity of the Site is generally flat and there are no slopes with gradients more than 10% over extensive distances near the Site. Therefore, in accordance with EA guidance[21], terrain data has not been included in the dispersion model.

3.2.5 Surface roughness

The roughness of the terrain over which a plume passes can have a significant effect on dispersion by altering the velocity profile with height and the degree of atmospheric turbulence. This is accounted for by a parameter called the surface roughness length.

A roughness length 0.3m has been used in this assessment which is consistent with the land cover across the model domain. A surface roughness length of 0.2m has been assigned to the Lydd met site.

3.2.6 Modelled scenario

As detailed in Section 1.2, the combustion plant at the Site consists of a CHP plant, one auxiliary biogas boiler, one flare, and one emergency backup diesel generator.

Only the CHP plant and boiler have been considered in the assessment; the backup diesel generator is only used for up to 50 hours per year for emergencies and testing and the flare is used infrequently. Therefore, emissions from the backup diesel generator and flare are considered to be infrequent and for very short periods and have not been considered further.

The CHP and boiler do not operate concurrently for extended periods. However, for the purposes of this assessment, it has been assumed that the CHP and boiler will operate continuously year-round (8760 hours a year) and at full load, which is a conservative approach considering the actual use of the combustion plant. Emissions from operation of the combustion plant and therefore contributions to annual mean ambient air quality concentrations would therefore likely be lower than assumed for this modelling assessment.

3.2.7 Emissions data

Emissions used in this assessment are based on a plant load of 100% and assumes that exhaust gases will contain the maximum concentration of pollutants permitted. Each of the CHP and boiler exhaust gases are released from their own, individual flue.

Emissions concentrations of NOx, SO_2 and VOCs for the CHP have been monitored in October 2023 and presented in a Stack Emissions Testing Report[22]. For this assessment, the NOx and SO_2 emissions for the CHP are based SR2021 ELVs of 500mg/Nm^3 for NOx and 350mg/Nm^3 for SO_2 (5% O_2, 0°C, dry). The monitored NOx and SO_2 emissions concentrations in the latest test report demonstrate compliance with these ELVs and the monitored SO_2 emission concentration was 0.19mg/Nm^3 which is considerably lower than the ELV.

The emissions of VOCs from the CHP are based on the monitored emissions concentration of 920mg/Nm^3 as there is no set ELV for VOCs emissions from the CHP. As discussed in Section

[21] Environment Agency, 2019. Specified generators: dispersion modelling assessment. Available at: https://www.gov.uk/guidance/specified-generators-dispersion-modelling-assessment

[22] Element Materials Technology Environmental UK, July 2023, Stack Emissions Testing Report

1.4.3, it has been assumed that 100% of the VOCs emitted from the CHP will be benzene, because this is the VOC for which a relevant EQS exists. The monitored total VOCs concentration does not speciate the VOCs so the actual benzene emission rate is not known. However, the assumption of 100% benzene emissions is likely to be a substantial overestimate and therefore highly conservative. The UK National Atmospheric Inventory (NAEI) report 'Speciation of UK emissions of non-methane volatile organic compounds'[23] provides a review of published VOC speciation profiles, the profiles relevant to this assessment have been summarised in Table 3.2 below. Although none of these are specific to combustion plant burning biogas, this range of published benzene fractions is likely to be indicative of the likely benzene fraction for the VOCs emissions from the CHP. The highest % benzene for any source listed in the table below is 9.1%. Therefore, it is likely that the assumption of 100% benzene adopted for this assessment is an overestimate of the actual benzene emissions by at least a factor of 10.

Table 3.2: Benzene fractions from combustion sources published by the NAEI

Source	% Benzene
Domestic combustion of gas	9%
Industrial combustion of gas	9.1%
Electricity generation using gas	nil
Internal combustion engine - natural gas	0.5%
Flares – natural gas	nil

The NOx and SO_2 emissions modelled in this assessment for the boiler is based on the Standard Rules 2021 No 10 ELVs for existing (operational before December 2018) boilers burning biogas, which are 250mg/Nm^3 for NOx and 200 mg/Nm^3 for SO_2 (5% O_2, 0°C, dry).

Monitored SO_2 emission concentrations from the CHP emissions test report and monitored sulphur levels in the latest biogas test report[24] suggest that the actual SO_2 emission rates are likely to be considerably lower (approximately a factor of 10 lower) than the SO_2 emission rates adopted for this assessment.

[23] N R Passant, Speciation of UK emissions of non-methane volatile organic compounds, February 2002

[24] DynaGreen Environmental UK Ltd, Analysis of Biogas Constituents, 28th July 2023.

Table 3.3 presents the emission parameters used in the dispersion modelling. The data used for any calculations are included in the 'Notes' section of the table. Emission rates for NOx and SO_2 have been calculated using the equations presented below:

Emission rate = Plant emission limit x Normalised gas flow.

Correcting for water content:

Dry value = Measured value x 100 / (100 – H_2O measured concentrations [%]).

Correcting for oxygen content:

Corrected value = Measured value x (21 – O_2 Reference value [%] / 21 – O_2 Measured Value [%]).

Correcting for temperature:

Corrected value = Measured value x (Temperature of measured value [K] / 273 [K]).

Table 3.3: Stack emission parameters

Parameter	Units	CHP	Boiler 1
Thermal input	MWth	1.84	1.48
Stack location	x,y	576614, 109396	576597, 109380
Stack height	m	10	15
Stack diameter	m	0.3	0.35
Exit temperature	°C	129	230
Efflux velocity	m/s	20.8	11.3
Volumetric flow rate (actual)	Am^3/s	1.47[(a)]	1.1[(b)]
Volumetric flow rate (normalisedl)	Nm^3/s	0.65[(c)]	0.45[(d)]
NO_x emission	g/s	0.32[(e)]	0.11[(f)]
SO_2 emission	g/s	0.23[(e)]	0.09[(f)]
VOCs emission	g/s	0.60[(g)]	-

Notes: (a) Calculated from the monitored actual %O2 for the CHP flue gas of 9.1% (dry) and the electrical output of 0.78MWe at 42% efficiency
(b) Calculated from the thermal input of the boiler (1.48MWth) and an assumed actual %O2 for the boiler flue gas of 4.8% (dry)
(c) Normalised conditions = 5% O_2, 0°C, 0% H_2O
(d) Normalised conditions = 3% O_2, 0°C, 0% H_2O
(e) Calculated from the SR2021 No 10. ELVs for combustion plant burning biogas of 500 mg/Nm^3 for NOx and 350 mg/Nm^3 for SO_2. (Pressure of 101.3 kPA, dry, 0°C, 5% O_2) and the rated electrical output of the CHP engine of 0.78MWe at 42% efficiency.
(f) Calculated from the SR2021 No 10. ELVs for existing boilers of 250 mg/Nm^3 for NOx and 200 mg/Nm^3 for SO_2 (Pressure of 101.3 kPA, dry, 0°C, 3% O_2) and the 1.48MWth thermal input
(g) Based on the latest monitored VOCs emissions concentration of 920 mg/Nm^3 (Pressure of 101.3 kPA, dry, 0°C, 5% O_2)

3.2.8 NOx to NO_2 relationship

The NOx emissions associated with combustion activities at the Site will typically comprise approximately 90-95% nitric oxide (NO) and 5-10% nitrogen dioxide (NO_2) at source. As described previously, the NO oxidises in the atmosphere in the presence of sunlight, ozone and volatile organic compounds to form NO_2, which is the principal concern in terms of environmental health effects.

There are various techniques available for estimating the portion of the NOx that is converted to NO_2, which will increase with distance from the source. The Environment Agency's modelling guidance[25] identifies that a 70% conversion of NOx to NO_2 should be used for calculation of annual average concentrations and a 35% conversion of NOx to NO_2 should be used for calculation of short-term concentrations. The Environment Agency's recommended conversion rates have been used in this assessment.

3.2.9 Assessment of short- and long-term concentrations

The long-term and short-term modelling undertaken assumes that the boiler and CHP will operate at full load continuously for 24 hours each day, which equates to 8760 hours a year. As discussed in Section 3.2.6, this is a very conservative approach because these combustion plant do not operate simultaneously in practice.

3.2.10 Background/ambient concentrations

Background concentrations, also known as ambient concentrations (AC), are added to the PCs to determine the PEC at modelled receptors. Environment Agency's dispersion modelling guidance[26] states that Defra background maps or local authority/Defra monitoring data can be used as a representative value for the background concentrations in the assessment. However, the Environment Agency specified generator guidance[27] states that low resolution grid average background values may not be suitable for receptor locations close to other sources such as busy roads or major industry. The results of air quality monitoring undertaken by HBC has been reviewed for representative data that can be applied to this assessment.

As the concentrations from the background maps and diffusion tube monitoring are long-term (annual) average concentrations, short-term background concentrations have been estimated by doubling the long-term background concentrations. The short-term backgrounds are applied to the 15-minute, hourly and 24-hour averaged concentrations. This is in accordance with Environment Agency risk assessment guidance[28].

3.3 Sensitive receptors

Gridded receptors and discrete human health and ecological receptors have been considered within this assessment.

3.3.1 Gridded receptors

Pollutant concentrations have been modelled across a Cartesian grid with 20 metre spacing up to 500m from the Site and at 100m spacing beyond this up to 2km from the Site. The finer 20m resolution captures the maximum modelled impacts which fall near to the Site while the 2km grid extent is sufficient to fully cover the range of modelled concentrations in the surrounding area. The maximum predicted PCs occur within this grid extent. The extent of the grid has been presented in Figure 3.3. This assessment has not considered on-site concentrations as the EQSs would not apply at these locations as there is no relevant public exposure.

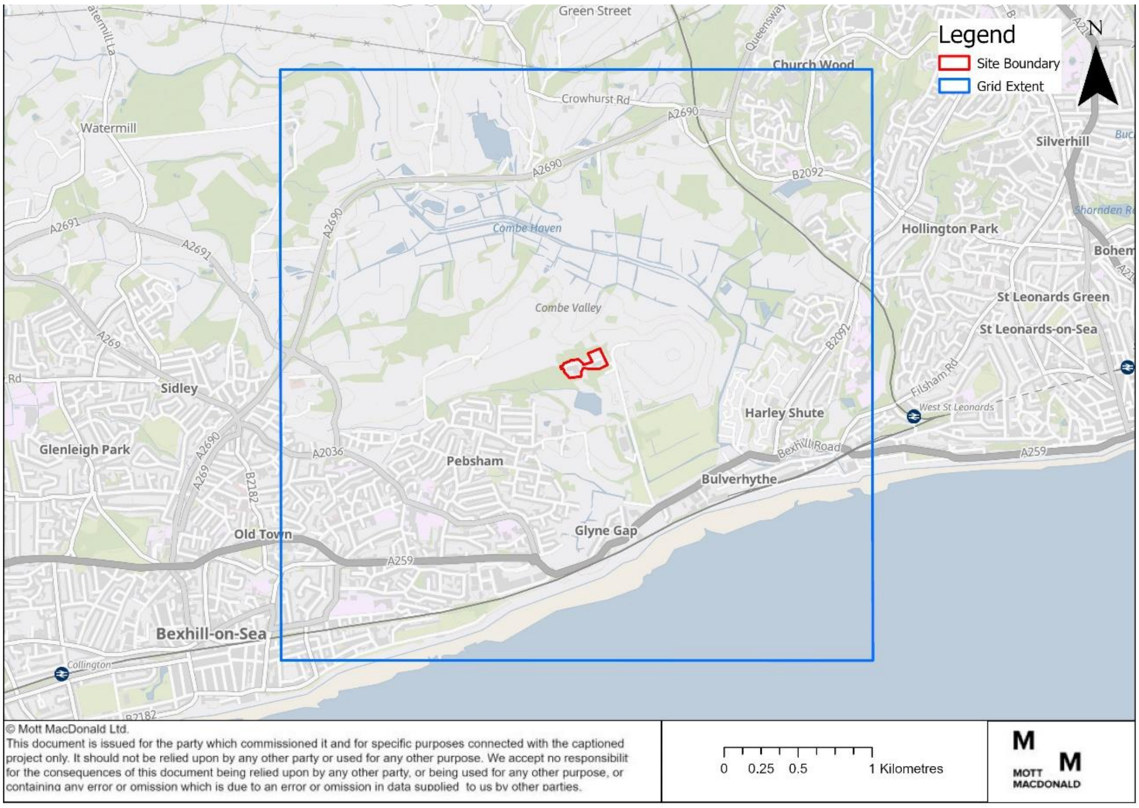
[25] Environment Agency, 2019. Specified generators: dispersion modelling assessment. Available at: https://www.gov.uk/guidance/specified-generators-dispersion-modelling-assessment

[26] Environment Agency, 2014. Environmental permitting: air dispersion modelling reports. Available at: https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports

[27] Environment Agency, 2019. Specified generators: dispersion modelling assessment. Available at: https://www.gov.uk/guidance/specified-generators-dispersion-modelling-assessment

[28] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

Figure 3.3: Gridded receptor model extent



3.3.2 Human health

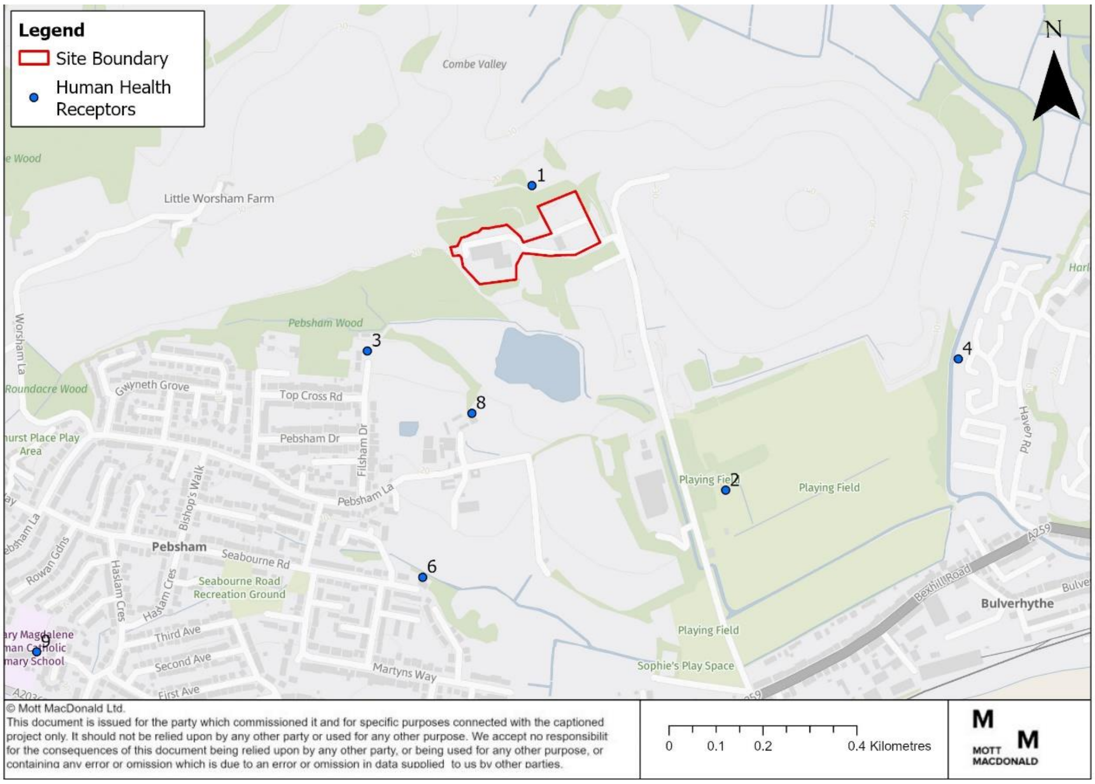
Nine discrete human health receptors representing the closest sensitive receptors have been included within the model so that a comparison against the EQSs can be made. Both the long-term and short long-term objectives apply at receptors 3-9 while only the hourly and 15-minute objectives apply at receptors 1-2 (see Table 2.2 for details). Table 3.4 and Figure 3.4 show the locations of the discrete receptors considered within this assessment.

Table 3.4: Modelled human health receptors

Receptor number	Receptor name	Receptor type	X	Y	Height (m)
1	Combe Valley Countryside Park Footpath (ST)	Footpath	576664	109514	1.5
2	Bulverhythe Recreation Ground (ST)	Footpath	576992	109024	1.5
3	Pebsham House	Residential	576313	109161	1.5
4	Keenan Holiday Lets	Residential	577573	109144	1.5
5	Actons Cottage	Residential	575094	110242	1.5
6	Pebsham Health Centre - Medical School	Residential	576431	108678	1.5
7	Robsack Primary Academy	School	577996	110773	1.5
8	Pebsham Farm House	Residential	576536	109028	1.5

Receptor number	Receptor name	Receptor type	X	Y	Height (m)
9	St Mary Magdalene Primary School	School	575608	108519	1.5

Figure 3.4: Modelled human health receptors



3.3.3 Ecological receptors

A review of ecological receptors has been carried out. Specific sites designated for their ecological importance need only be considered where they fall within set distances from the assessment site, as specified in the Environment Agency risk assessment guidance[29].

- Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within 10km
- Sites of Special Scientific Interest (SSSIs) within 2km
- Other locally and nationally designated habitat sites including National Nature Reserves (NNRs), Local Nature Reserves (LNRs), Ancient Woodland sites (AWs) and Local Wildlife Sites (LWSs) within 2km.

The following habitat sites are located within the above screening distances and have been included in this assessment:

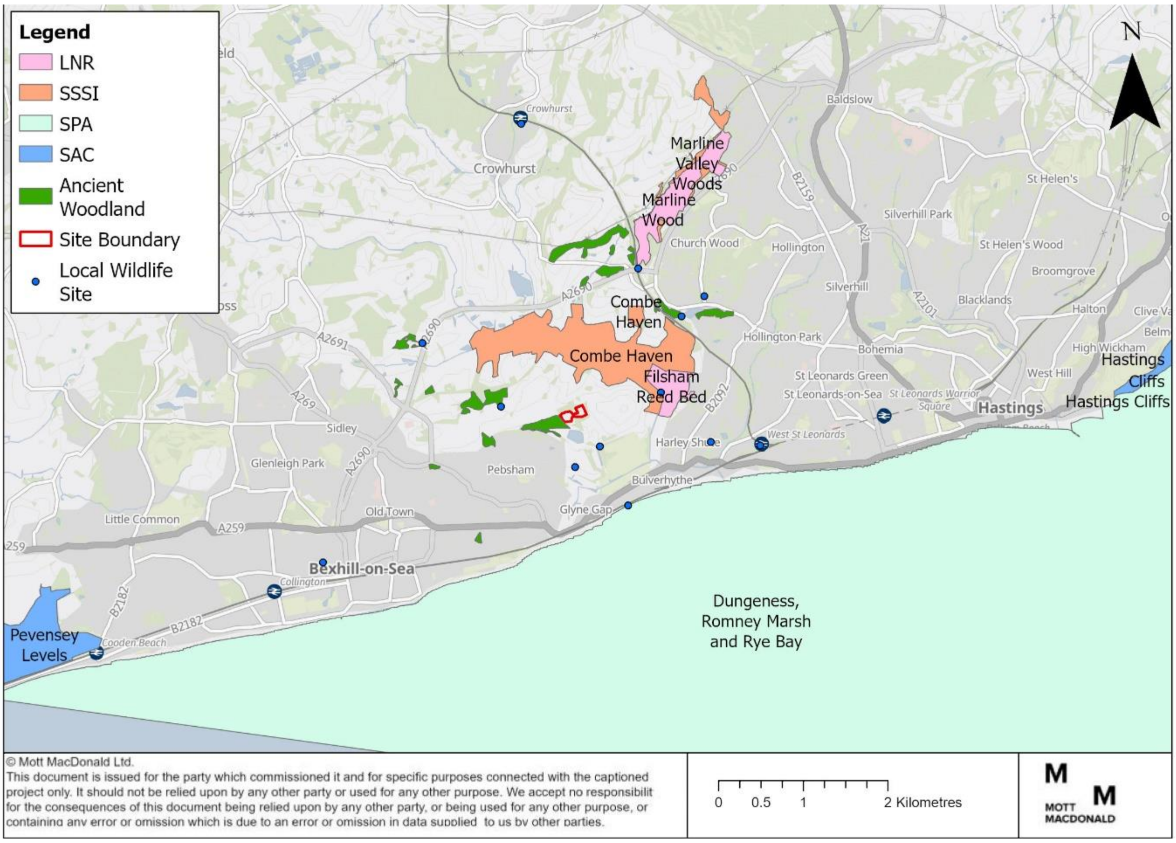
- Dungeness Romney Marsh and Rye Bay SPA
- Pevensey Levels SAC and Ramsar

[29] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

- Hastings Cliffs SAC
- Combe Haven SSSI
- Marline Valley Woods SSSI
- Filsham Reed Bed LNR
- Marline Wood LNR
- 22 parcels of Ancient Woodland, the closest of which is Pebsham Wood immediately to the west of the Site boundary
- 13 local wildlife sites, the closest of which is Marshy Grassland and Reedbed Glyne Gap approximately 400m to the south of the Site boundary

Figure 3.5 shows the locations of the ecological receptors modelled in this assessment.

Figure 3.5: Modelled ecological receptors



3.4 Effects on conservation sites

In accordance with the Environment Agency risk assessment guidance[30],the impact of NOx and SO_2 on conservation sites should be assessed against site relevant:

- Critical levels
- Nutrient nitrogen critical loads

[30] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

- Acid deposition critical loads

3.4.1 Critical levels

Critical levels for the protection of vegetation and ecosystems are presented in Table 2.3. The contribution of NOx and SO_2 at the designated sites has been calculated for comparison against the identified critical levels presented in Section 2.4.2.

The critical levels correspond to national environmental standards for protected conservation areas and apply at all locations within the designated site boundaries. The closest points at the designation boundaries to the Site have been modelled and the maximum modelled concentrations have been compared against the critical levels.

3.4.2 Critical loads

Critical loads are a quantitative estimate of exposure to deposition of one or more pollutants, below which significant harmful effects on sensitive elements of the environment do not occur according to present knowledge. Critical load data are applicable to specific habitats and it may be necessary to consider the spatial distribution of various habitats present within the designation boundary of a site. For the SPA, SAC, Ramsar and SSSI sites, the lower nitrogen and acid critical loads for the most sensitive habitat listed on APIS website has been applied to the closest modelled point at the designation boundary as a worst-case assumption.

For local wildlife sites, site specific APIS data for are not available, however the APIS Search by Location tool was used to provide critical load data for the ‘broadleaved, mixed and yew woodland’ habitat class for Marline Wood LNR and Pebsham Wood Ancient Woodland, which are woodland sites, and critical load data for the ‘fen, marsh and swamp’ habitat class was obtained for Filsham Reed Bed LNR and marshy Grassland and Reedbed Glyne Gap LWS, which is considered appropriate for these wetland sites.

The critical loads for the designated sites considered within the assessment are presented in Table 3.5.

Table 3.5: Critical loads for designated sites

Site name	APIS Nitrogen Critical Load Class	APIS Acidity Critical Load Class	Modelled Location (x, y)	Nitrogen deposition Lower critical load (kg/ha/yr)	Acid deposition critical loads		
					CLmax S (keq/ha/ yr)	CLmin N (keq/ha / yr)	CLmax N (keq/ha / yr)
Dungeness Romney Marsh and Rye Bay SPA	Northern wet heath	Calcareous grassland (using base cation)	577215, 108274	5	4.000	0.856	4.856
Pevensey Levels SAC and Ramsar	NA	NA	571081, 106743	No comparable habitat with established critical load estimate available			
Hastings Cliffs SAC	NA	NA	583043, 109467	No comparable habitat with established critical load estimate available			
Combe Haven SSSI	Carpinus and Quercus mesic deciduous forest	Unmanaged Broadleafed/ Coniferous Woodland	576694, 109756	15	2.582	0.142	2.932

Site name	APIS Nitrogen Critical Load Class	APIS Acidity Critical Load Class	Modelled Location (x, y)	Nitrogen deposition Lower critical load (kg/ha/yr)	Acid deposition critical loads		
					CLmax S (keq/ha/ yr)	CLmin N (keq/ha / yr)	CLmax N (keq/ha / yr)
Marline Valley Woods SSSI	Low and medium altitude hay meadows	Unmanaged Broadleafed/ Coniferous Woodland	577412, 111103	10	2.584	0.142	2.928
Filsham Reed Bed LNR	Fen, marsh and swamp	Fen, marsh and swamp	577517, 109820	5	This habitat is not sensitive to acidity		
Marline Wood LNR	Broadleaved deciduous woodland	Broadleaved deciduous woodland	577413, 111155	10	2.786	0.142	2.928
Pebsham Wood Ancient Woodland	Broadleaved deciduous woodland	Broadleaved decifuous woodland	576518, 109322	10	2.790	0.142	2.932
Marshy Grassland and Reedbed Glyne Gap LWS	Fen, marsh and swamp	Fen, marsh and swamp	576965, 109017	5	This habitat is not sensitive to acidity		

Source: APIS website

3.4.2.1 Critical loads – acidification

Percentage contributions to acid deposition have been derived from dispersion modelling. Deposition rates were calculated using empirical methods recommended by Environment Agency guidance[31] as follows:

- Calculate dry deposition flux. NOx: 0.0015 m/s for grassland, 0.003 m/s for forest. SO_2: 0.012m/s for grassland, 0.024 m/s for forest
- Dry deposition flux (µg/m^2/s) = ground level concentration (µg/m^3) x deposition velocity (m/s)
- Convert units from µg/m^2/s to units of keq/ha/yr by multiplying the dry deposition flux by standard conversion factors (6.84 for NO_2 and 9.84 for SO_2)

Wet deposition in the near field is not significant compared with dry deposition and therefore for the purposes of this assessment, wet deposition has not been considered.

Predicted contributions to acid deposition have been calculated and compared with the relevant critical load function for each habitat type associated with each designated site, as derived from the APIS.

3.4.2.2 Critical loads – eutrophication

Percentage contributions to nutrient nitrogen deposition have been derived from dispersion modelling. Deposition rates were calculated using empirical methods recommended by Environment Agency guidance, as follows:

[31] Environment Agency. (2006) Technical Guidance on detailed modelling approach for an appropriate assessment for emissions to air: Habitats Directive 2004 (AQTAG 06).

- Calculate NO_2 dry deposition flux (0.0015 m/s for grassland, 0.003 m/s for forest assumed as deposition velocity):
  – Dry deposition flux (µg/m^2/s) = ground level concentration (µg/m^3) x deposition velocity (m/s)
- Convert units from µg/m^2/s to units of kg/ha/yr by multiplying the dry deposition flux by a standard conversion factor (95.9 for NO_2).

Wet deposition in the near field is not significant compared with dry deposition and therefore for the purposes of this assessment, wet deposition has not been considered.

Predicted contributions to nitrogen deposition have been calculated and compared with the relevant critical load range for each habitat type associated with each designated site, as derived from the APIS.

3.5 Significance criteria

Several approaches can be used to determine whether the potential air quality effects of a development are significant. However, there remains no universally recognised definition of what constitutes 'significance'.

Guidance is available from a range of regulatory authorities and advisory bodies on how best to determine and present the significance of effects within an air quality assessment. It is generally considered good practice that, where possible, an assessment should communicate effects both numerically and descriptively.

Definitions of significance have been adopted from the Environment Agency's air dispersion modelling guidance[32]. This guidance provides criteria for the screening out of insignificant PCs however does not provide explicit criteria regarding the significance of PECs. This guidance advises that an assessment must explain how significance has been judged and base this on the site specific circumstances. For this assessment, the conservative assumptions regarding the operational load for the combustion plant and the emissions data adopted for SO_2 will strongly bias the modelled concentrations towards the worst-case, where it is highly likely that the actual concentrations would be lower than reported. Therefore, it is considered appropriate for the Site to judge that the PECs are insignificant where they do not exceed the EQS.

Table 3.6 provides a summary of criteria used to screen out insignificant impacts.

Table 3.6: Summary of assessment criteria

Parameter	Long-term standards	Short-term standards
Screen out insignificant emissions (PCs)	Emissions can be seen as insignificant where: PC long-term <= 1% of standard	Emissions can be seen as insignificant where: PC short-term <= 10% of standard
Screening for SPAs, SACs, Ramsar and SSSIs	The long-term PC is less than 1% of the long-term environmental standard for protected conservation areas	The short-term PC is less than 10% of the short-term environmental standard for protected conservation areas
Screening for local wildlife sites	The short term PC is less than 100% of the short term environmental standard for protected conservation areas	The long term PC is less than 100% of the long term environmental standard for protected conservation areas
Screen out insignificant PECs	Resulting PEC does not exceed the relevant EQS	

Note: PC = Process Contribution; PEC = Predicted Environmental Concentration (PC + Ambient Concentration, AC)
*Local wildlife sites include Ancient Woodlands, NNRs, LNRs and other non-statutory wildlife sites

[32] Environment Agency, 2014. Environmental permitting: air dispersion modelling reports. Available at: https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports

4 Baseline conditions

4.1 Introduction

Information on air quality in the UK can be obtained from a variety of sources including local authorities, national network monitoring sites and other published sources. For the purpose of this assessment, data has been obtained from HBC[33]. Data from the most recent year of monitoring data, 2022, has been used in this assessment.

4.2 Review and assessment of air quality in the study area

HBC has not declared any AQMAs within its administrative area.

4.2.1 Local authority automatic monitoring

HBC undertakes automatic monitoring at one location within its administrative area. This location is not near to or considered representative of the Site and surrounding receptors.

4.2.2 Local authority diffusion tube monitoring

HBC undertook diffusion tube monitoring at 14 locations during 2022. The nearest of these is located approximately 1.2km to the south of the Site on A259 Bexhill Road. Monitored concentrations at this location are unlikely to be representative of the Site because of the higher degree of traffic congestion relative to the Site and surrounding receptors.

HBC reported no exceedances of the annual mean objective for NO_2 during 2022.

4.3 Defra projected background pollutant concentrations

Defra provides estimates of background pollution concentrations for NO_X and NO_2 across the UK for each one-kilometre grid square for every year from 2018 to 2030. Data is also available from Defra on SO_2 concentrations, however the most recent year of data available for SO_2 and VOCs is 2022.

Data from these sources has been collected for the grid square containing the Site and the grid squares containing the discrete human health receptors.

The Defra projected background concentrations for the grid square containing the Site for 2023 are presented in Table 4.1. These ACs have been added to the PCs to determine the PEC at the gridded receptors. The ACs used for the human health receptors correspond to the concentrations for the grid square the receptor is located in.

As discussed in Section 3.2.10, short-term background concentrations have been assumed to be twice the annual mean concentrations in line with Environment Agency guidance.[34]

Table 4.1: 2023 Defra projected background concentrations for the Site (µg/m^3)

Pollutant	Long-term	Short-term
NO_X	9.1	18.2
NO_2	7.1	14.2

[33] Hastings Borough Council, 2023. 2023 Air Quality Annual Status Report.

[34] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

Pollutant	Long-term	Short-term
SO_2	1.0	2.0
VOCs	0.4	0.9

Notes: Results rounded to 1 decimal place
Pollutant concentrations for OS grid square 576500, 109500 is presented
Background concentrations of SO_2 and VOCs presented for 2022, which is the most recent year of data presented on Defra's website https://uk-air.defra.gov.uk/data/pcm-data

4.3.1 Summary

Air quality monitoring undertaken by HBC for the period from demonstrates that there were no exceedances of the annual mean NO_2 objective during 2022. Defra projected background concentrations for 2023 at the Site also indicate that background concentrations are low.

5 Results

5.1 Overview

The results of modelling atmospheric emissions from the Site at gridded and human health receptors are summarised and interpreted below. The model results are presented in tabular form and as contour plots. The PCs and PECs have been compared against the EQSs and assessment criteria stated within Environment Agency's risk assessment guidance and defined for this assessment considering site-specific circumstances[35], as presented in Table 3.6, to assess the significance of the air quality impacts from the Site.

It is important to note that in order to undertake a conservative modelling assessment, the CHP and boiler have been assumed to be all operating at full load, continuously all year. In practice, these combustion plant do not operate concurrently for extended periods of time. Furthermore, as discussed in Section 3.2.7, the SO_2 emission rates adopted for this assessment are likely to be much higher than the actual SO_2 emission rates as based on conservative emission limits rather than the sulphur content of the biogas. The benzene emissions are also based on assumption of a 100% benzene fraction for the VOCs which is highly conservative.

5.2 Gridded receptors

Table 5.1 presents the maximum predicted PCs for NO_2, SO_2 and VOCs at offsite locations across the modelled grid.

Each of the predicted PCs for NO_2, SO_2 and VOCs are above 1% of the long-term EQS and above 10% of the short-term EQS. Therefore, these impacts cannot be screened out according to the Environment Agency significance criteria[36] so the PECs have also been considered.

Table 5.1: Maximum NO_2 and SO_2 process contributions (PCs) (µg/m³) – Gridded receptors

Pollutant	Averaging period	Max PC	Max PC as % of EQS	EQS (µg/m³)
NO_2	99.79 %'ile of hourly averages	31.3	**16%**	200
	Annual average	8.0	**20%**	40
SO_2	99.9 %'ile of 15-minute averages	69.0	**26%**	266
	99.73 %'ile of hourly averages	62.1	**18%**	350
	99.18 %'ile of 24-hour averages	29.8	**24%**	125
VOCs (benzene)	100 %'ile of 24-hour averages	72.3	**241%**	30
	Annual average	13.6	**271%**	5

Notes: Results rounded to 1 decimal place
PC = Process Contribution; EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
The results in **bold** are those that cannot be screened out as insignificant according to EA criteria

[35] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

[36] the PCs are greater than 1% of the long-term standards, and the 10% of the short-term standards

The PECs are presented in Table 5.2. Each of the PECs for NO_2 and SO_2 are below the relevant EQS and therefore considered insignificant. The PECs for VOCs are above the relevant EQS and as such are considered potentially significant.

Contour plots of the PECs in the worst-case meteorological years are presented in Figure 5.1 to Figure 5.5. For NO_2 and SO_2, these contours demonstrate that the maximum offsite annual and hourly PCs for NO_2 and 15-minute, hourly and 24-hour SO_2 PCs are highly localised close to the perimeter of the Site primarily where there is no relevant exposure. The maximum offsite PECs for NO_2 and SO_2 are below the EQSs and are considered insignificant.

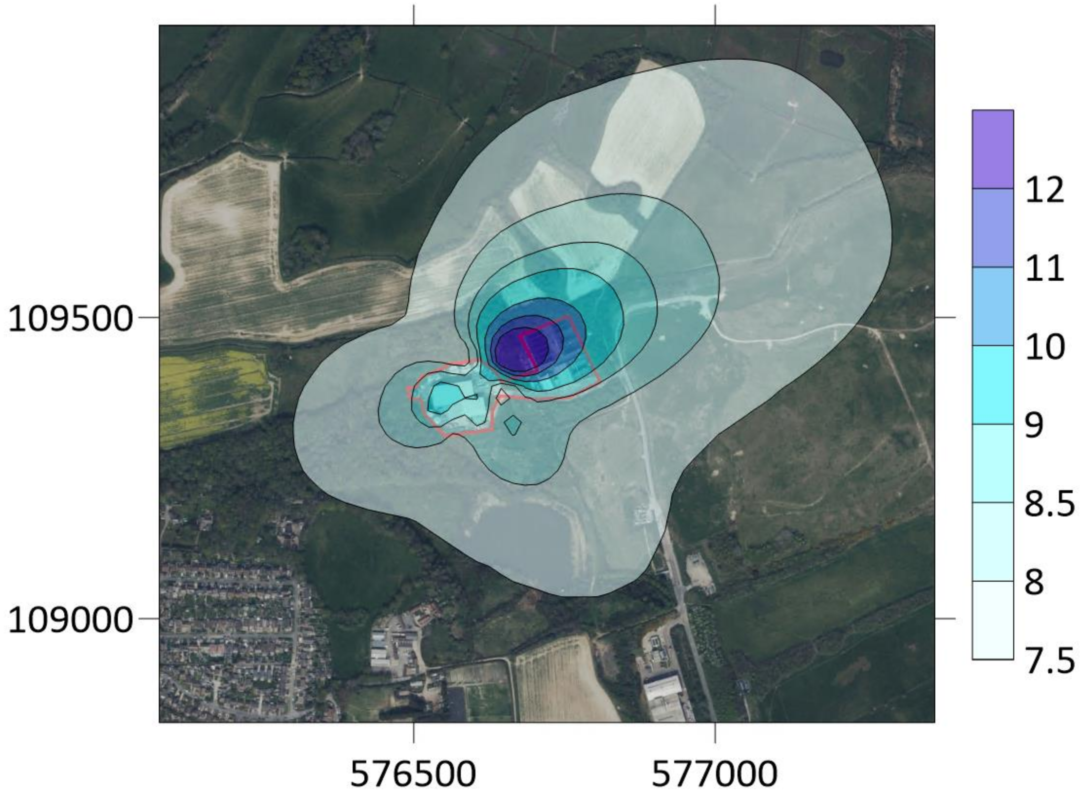
For the annual and daily EQSs for VOCs, the contour plots presented in Figure 5.6 and Figure 5.7 show that there is no relevant exposure areas surrounding the Site perimeter where the PECs exceed the EQS. Furthermore, the modelling of VOCs assumes the fraction of benzene in the VOCs emitted from the CHP is 100%. As discussed in Section 3.2.7, this is likely to lead to an overestimation of the actual benzene emissions by at least a factor of 10. Adopting more realistic assumption of 10% benzene would reduce the PCs by a factor of 10 and the annual and 24-hour PECs would fall well below the relevant EQS. On that basis, the modelled impacts for VOCs are considered insignificant.

Table 5.2: Maximum NO_2 and SO_2 predicted environmental concentration (PECs) (µg/m³) – Gridded receptors

Pollutant	Averaging period	EQS	AC	Max PC	Max PEC	Max PEC as % of EQS
NO_2	99.79 %'ile of hourly averages	200	14.2	31.3	45.5	23%
	Annual average	40	7.1	8.0	15.1	38%
SO_2	99.9 %'ile of 15-minute averages	266	2.0	69.0	71.0	27%
	99.73 %'ile of hourly averages	350	2.0	62.1	64.1	18%
	99.18 %'ile of 24-hour averages	125	2.0	29.8	31.8	25%
VOCs (benzene)	100 %'ile of 24-hour averages	30	0.9	72.3	73.2	**244%**
	Annual average	5	0.4	13.6	14.0	**280%**

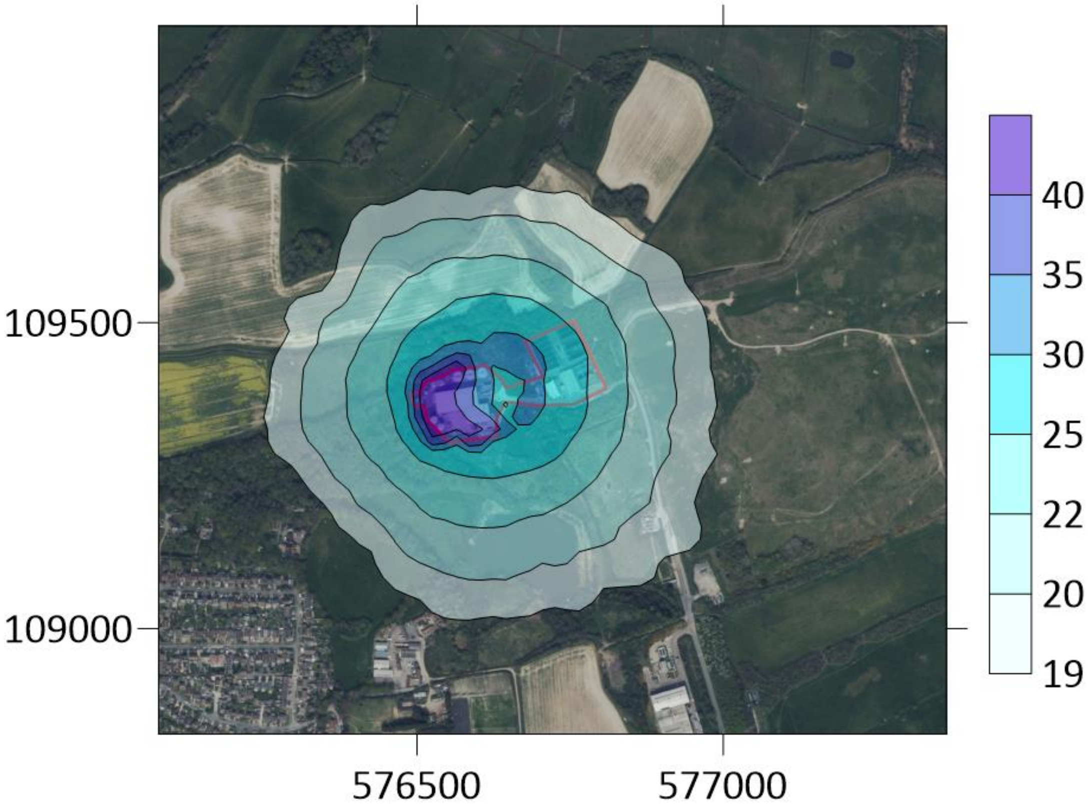
Notes: Results rounded to 1 decimal place
AC= Ambient Concentration (2023 Defra background concentration); PC = Process Contribution; PEC = Predicted Environmental Concentration (AC+PC=PEC); EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
The results in **bold** are those that cannot be screened out as insignificant according to EA criteria

Figure 5.1: Annual mean NO_2 PEC (µg/m^3)



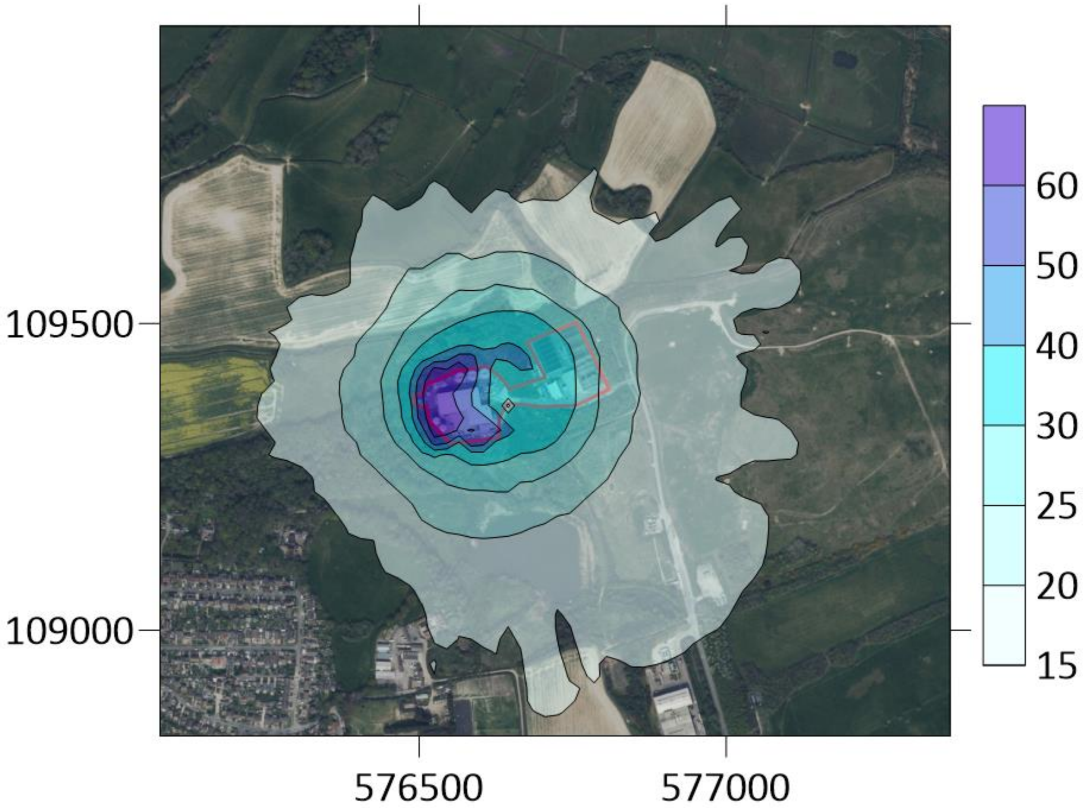
Note: Results presented for the worst case meteorological year of 2020. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary is outlined in red. The 2023 Defra background concentration for the grid square of the maximum PC has been assumed for the ambient concentrations for all gridded receptors. This 2023 Defra background concentration is 7.1 µg/m^3.

Figure 5.2: Hourly mean (99.79th percentile) NO_2 PEC (µg/m^3)



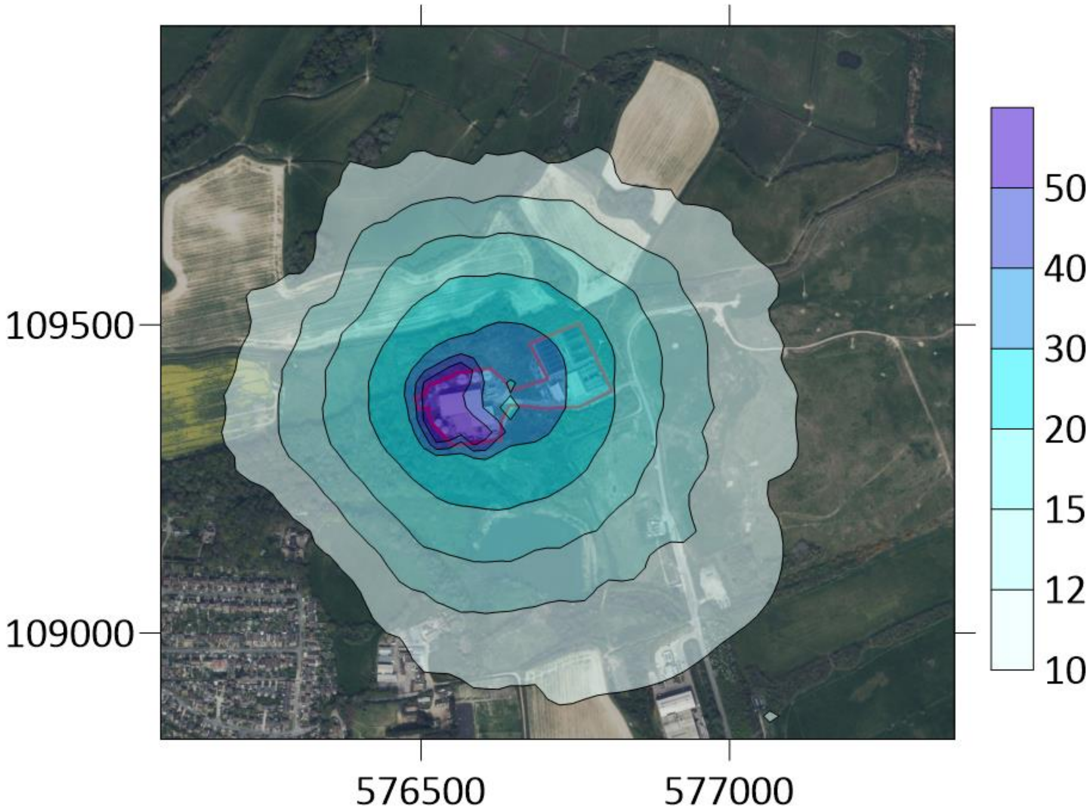
Note: Results presented for the worst case meteorological year of 2022. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2023 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2023 Defra background concentration is 14.2 µg/m^3.

Figure 5.3: 15-minute mean (99.9th percentile) SO_2 PEC (µg/m³)



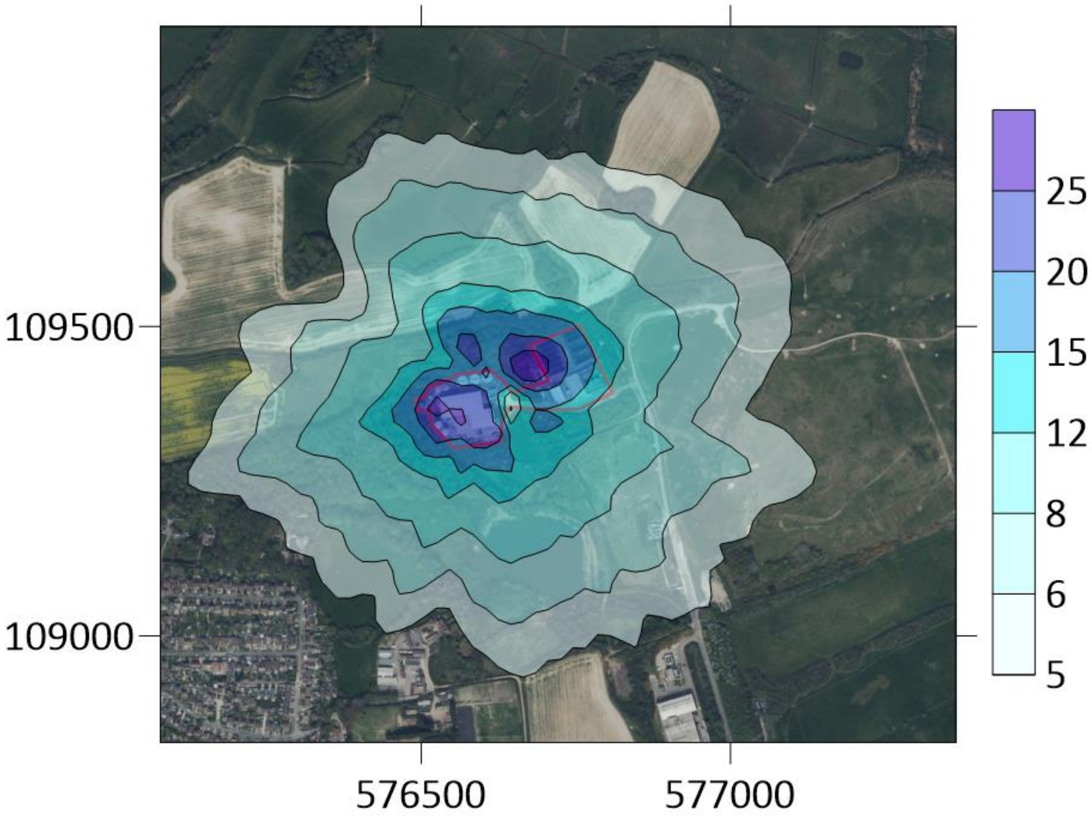
Note: Results presented for the worst case meteorological year of 2022. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2022 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2022 Defra background concentration is 2.0 µg/m³.

Figure 5.4: Hourly mean (99.73rd percentile) SO_2 PEC (µg/m³)



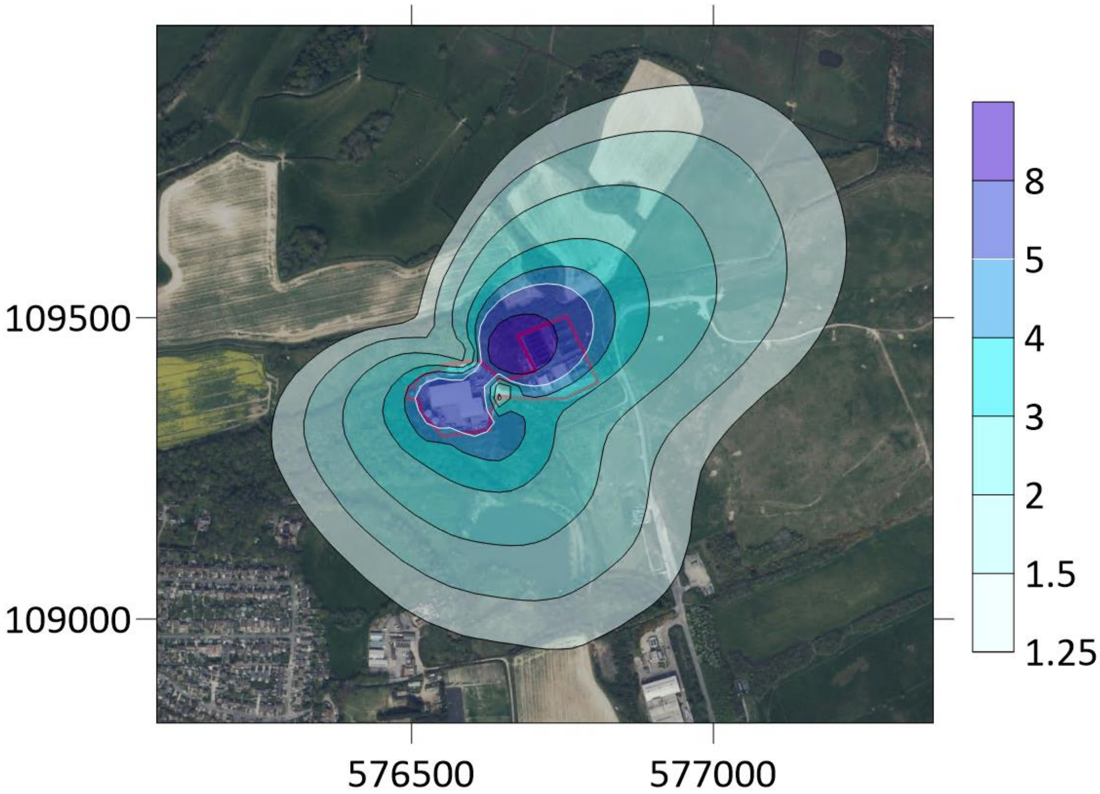
Note: Results presented for the worst case meteorological year of 2022. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2022 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2022 Defra background concentration is 2.0 µg/m3.

Figure 5.5: 24-hour mean (99.18th percentile) SO_2 PEC (µg/m³)



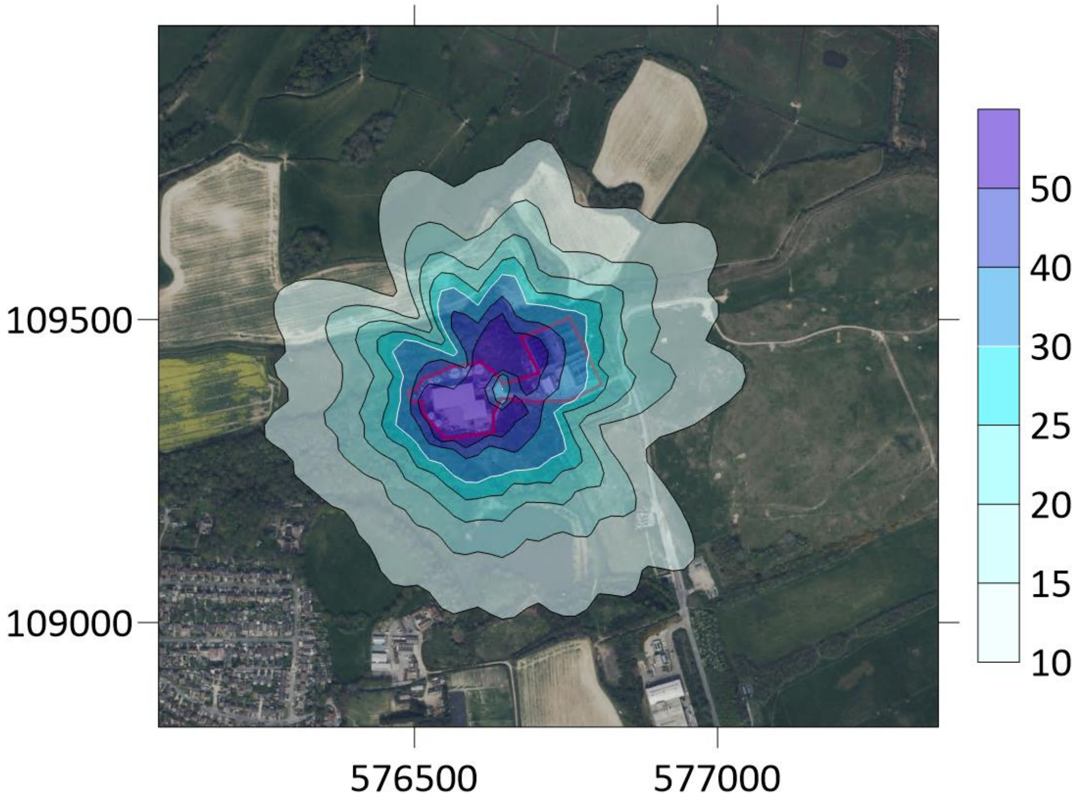
Note: Results presented for the worst case meteorological year of 2022. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2022 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2021 Defra background concentration is 2.0 µg/m³.

Figure 5.6: Annual mean VOCs (benzene) PEC (µg/m³)



Note: Results presented for the worst case meteorological year of 2021. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2022 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2022 Defra background concentration is 0.4 µg/m³. The EQS of 5µg/m³ is indicated by the white contour line.

Figure 5.7: 24-hour mean (100th percentile) VOCs (benzene) PEC (µg/m³)



Note: Results presented for the worst case meteorological year of 2021. The worst case meteorological year is determined by calculating the year with the maximum offsite concentration modelled across the gridded receptors. Site boundary and modelled stacks are outlined in red. The 2022 Defra background concentration for the grid square of the maximum PC (multiplied by 2) has been assumed for the ambient concentrations for all gridded receptors. This 2022 Defra background concentration is 0.9 µg/m³. The EAL of 30µg/m³ is indicated by the white contour line.

5.3 Human health discrete receptors

5.3.1 NO_2 concentrations

The PCs and PECs for hourly and annual NO_2 concentrations at discrete human health receptors are summarised in Table 5.3 and Table 5.4.

The predicted hourly NO_2 PCs are below 10% of the EQS at all receptors. Therefore, in accordance with Environment Agency guidance[37], the hourly impacts for NO_2 are considered insignificant.

For the annual mean, the predicted PC is above 1% of the EQS at receptor 8, but the PECs are well below the EQS. Therefore, the annual mean impacts for NO_2 are considered insignificant.

Table 5.3: Maximum process contributions (PCs) (µg/m³) – 99.79 %'ile of hourly averages - Discrete human health receptors

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS
1	200	12.8	6.4

[37] Environment Agency, 2016. Air emissions risk assessment for your environmental permit. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS
2	200	4.1	2.1
3	200	4.2	2.1
4	200	2.2	1.1
5	200	0.8	0.4
6	200	2.8	1.4
7	200	0.9	0.4
8	200	4.8	2.4
9	200	1.2	0.6

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
Results rounded to 1 decimal place

Table 5.4: Maximum process contributions (PCs) (µg/m³) – Annual average - Discrete human health receptors

Receptor	EQS	Max PC	Max PC as % of EQS	AC	Max PEC	Max PEC as % of EQS
3	40	0.4	0.9	7.1	7.5	18.8
4	40	0.1	0.3	8.6	8.7	21.8
5	40	0.0	0.1	7.0	7.1	17.7
6	40	0.2	0.4	9.2	9.4	23.5
7	40	0.1	0.2	7.5	7.6	18.9
8	40	0.5	**1.1**	7.1	7.6	18.9
9	40	0.0	0.1	8.8	8.9	22.2

Notes: PC = Process Contribution;
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2023 Defra background concentration)
PEC = Predicted Environmental Concentration (AC+PC=PEC)
Results rounded to 1 decimal place
The PCs in **bold** are those that cannot be screened out as insignificant according to EA criteria
Modelled impacts at only the receptors where the annual mean EQS is applicable are presented.

5.3.2 SO_2 concentrations

The PCs and PECs for 15-minute, hourly and daily SO_2 at discrete human health receptors are summarised in Table 5.5 to Table 5.7.

The 15-minute PCs exceed 10% of the EQS at receptor 1. The daily and hourly PCs do not exceed 10% of the EQS at any receptors. All PECs are well below the EQS. On that basis, all short term impacts for SO_2 are considered insignificant.

Table 5.5: Maximum SO_2 process contributions (PCs) (µg/m³) – 99.9 %'ile of 15-minute averages - Discrete human health receptors

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS	AC	Max PEC	Max PEC as % of EQS
1	266	29.1	**10.9**	2.0	31.1	11.7
2	266	13.0	4.9	2.0	15.0	5.6
3	266	12.0	4.5	2.0	14.0	5.3
4	266	7.7	2.9	3.2	10.9	4.1
5	266	3.2	1.2	1.8	4.9	1.9

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS	AC	Max PEC	Max PEC as % of EQS
6	266	10.3	3.9	2.5	12.8	4.8
7	266	3.2	1.2	2.6	5.8	2.2
8	266	13.9	5.2	2.0	15.9	6.0
9	266	4.5	1.7	2.5	7.0	2.6

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2022 Defra background concentration)
PEC = Predicted Environmental Concentration (AC+PC=PEC)
Results rounded to 1 decimal place
The PCs in **bold** are those that cannot be screened out as insignificant according to EA criteria

Table 5.6: Maximum SO_2 process contributions (PCs) (µg/m³) – 99.73 %'ile of hourly averages - Discrete human health receptors

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS
1	350	25.9	7.4
2	350	8.4	2.4
3	350	8.3	2.4
4	350	4.4	1.2
5	350	1.5	0.4
6	350	5.5	1.6
7	350	1.7	0.5
8	350	9.6	2.7
9	350	2.2	0.6

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2022 Defra background concentration)
Results rounded to 1 decimal place

Table 5.7: Maximum SO_2 process contributions (PCs) (µg/m³) – 99.18 %'ile of 24-hour averages - Discrete human health receptors

Receptor	EQS (µg/m³)	Max PC	Max PC as % of EQS
3	125	3.5	2.8
4	125	1.5	1.2
5	125	0.3	0.2
6	125	1.5	1.2
7	125	0.4	0.3
8	125	4.3	3.4
9	125	0.5	0.4

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2022 Defra background concentration)
PEC = Predicted Environmental Concentration (AC+PC=PEC)
Results rounded to 1 decimal place
The PCs in **bold** are those that cannot be screened out as insignificant according to EA criteria
Modelled impacts at only the receptors where the annual mean EQS is applicable are presented.

5.3.3 VOCs (benzene) concentrations

The PCs and PECs for daily and annual VOCs at discrete human health receptors are summarised in Table 5.8 and Table 5.9.

The 24-hour PCs are predicted to be above 10% of the EQS at receptors 3, 4, 6 and 8, while the PECs are all below the EQS. Therefore, the 24-hour impacts for VOCs are therefore considered insignificant.

For the annual mean, the PCs are predicted to be above 1% of the EQS at receptors 3-4 and 6-9, while the PECs are all below the EQS. The annual-mean impacts for VOCs are therefore considered insignificant.

Table 5.8: Maximum VOCs (benzene) process contributions (PCs) (µg/m³) – 100 %'ile of 24-hour averages - Discrete human health receptors

Receptor	EQS (µg/m^3)	Max PC	Max PC as % of EQS	AC	Max PEC	Max PEC as % of EQS
3	30	7.7	**25.8%**	0.9	8.6	28.7%
4	30	3.3	**10.9%**	0.9	4.2	13.9%
5	30	0.7	2.3%	0.9	1.5	5.1%
6	30	4.4	**14.7%**	0.9	5.3	17.7%
7	30	0.9	3.1%	0.9	1.8	6.1%
8	30	11.8	**39.3%**	0.9	12.7	42.2%
9	30	1.6	5.3%	0.9	2.5	8.4%

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2022 Defra background concentration)
PEC = Predicted Environmental Concentration (AC+PC=PEC)
Results rounded to 1 decimal place
The PCs in **bold** are those that cannot be screened out as insignificant according to EA criteria

Table 5.9: Maximum VOCs (benzene) process contributions (PCs) (µg/m³) – annual average - Discrete human health receptors

Receptor	EQS (µg/m^3)	Max PC	Max PC as % of EQS	AC	Max PEC	Max PEC as % of EQS
3	5	0.8	**15.1%**	0.4	1.2	23.8%
4	5	0.3	**5.3%**	0.4	0.7	14.0%
5	5	0.0	0.8%	0.4	0.5	9.4%
6	5	0.3	**6.7%**	0.5	0.8	15.7%
7	5	0.1	**2.9%**	0.5	0.6	11.9%
8	5	0.9	**18.5%**	0.4	1.4	27.2%
9	5	0.1	**1.9%**	0.5	0.6	11.2%

Notes: PC = Process Contribution
EQS = Environmental Quality Standard, equivalent to the ambient air quality objectives
AC= Ambient Concentration (2022 Defra background concentration)
Results rounded to 1 decimal place

5.4 Ecological receptors

This section presents the maximum PCs and PECs for comparison with the relevant daily and annual NOx EQS (critical levels) and relevant nitrogen and acid deposition critical loads.

The maximum PCs are presented below are based on concentrations modelled at the closest point at the boundary of each site (see Section 3.3.3 for details).

5.4.1 Assessment of critical levels

Table 5.10 and Table 5.11 present the maximum predicted annual and daily NOx PCs.

The maximum predicted annual NOx PCs exceed 1% of the relevant EQS at Combe Haven SSSI, though the PEC does not exceed the EQS. The maximum annual NOx PCs are below 1% of the EQS at all other modelled Ramsar, SPA, SAC and SSSI sites and below 100% of the EQS at the local wildlife sites. The impact is therefore considered insignificant.

The maximum predicted daily NOx PCs exceed 10% of the relevant EQS at Combe Haven SSSI, while the maximum PEC does not exceed the EQS at this site. The maximum daily NOx PCs are below 10% of the EQS at other modelled Ramsar, SPA, SAC and SSSI sites and below 100% of the EQS at the local wildlife sites. The impact is therefore considered insignificant.

Table 5.10: Maximum annual NOx critical level results

Receptor	EQS (µg/m^3)	Max PC (µg/m^3)	% PC of EQS	AC (µg/m^3)	PEC (µg/m^3)	% PEC of EQS
Dungeness Romney Marsh and Rye Bay SPA	30	0.1	0.5%	9.8	10.0	33%
Pevensey Levels SAC and Ramsar	30	<0.1	0.0%	8.5	8.5	28%
Hastings Cliffs SAC	30	<0.1	<0.1%	8.4	8.4	28%
Combe Haven SSSI	30	0.8	**2.6%**	9.1	9.9	33%
Marline Valley Woods SSSI	30	0.1	0.2%	10.5	10.6	35%
Filsham Reed Bed LNR	30	0.3	1.1%	11.2	11.5	38%
Marline Wood LNR	30	0.1	0.2%	10.5	10.6	35%
Pebsham Wood Ancient Woodland	30	2.8	9.4%	9.1	12.0	40%
Marshy Grassland and Reedbed Glyne Gap LWS	30	0.5	1.7%	9.1	9.6	32%

Note: PC = Process Contribution; PEC=Predicted Environmental Concentration; AC=Ambient Concentration (2023 Defra NOx backgrounds); EQS = Environment Quality Standards
Arithmetic discrepancies may occur due to rounding of results, and due to differences in worst-case meteorological years
The PCs in **bold** cannot be screened out as insignificant according to EA criteria.

Table 5.11: Maximum daily NOx critical level results

Receptor	EQS (µg/m^3)	Max PC (µg/m^3)	% PC of EQS	AC (µg/m^3)	PEC (µg/m^3)	% PEC of EQS
Dungeness Romney Marsh and Rye Bay SPA	75	1.5	1.9%	19.7	21.1	28%
Pevensey Levels SAC and Ramsar	75	0.1	0.1%	17.0	17.1	23%
Hastings Cliffs SAC	75	0.2	0.2%	16.7	16.9	23%
Combe Haven SSSI	75	8.3	**11.1%**	18.2	26.6	35%
Marline Valley Woods SSSI	75	0.7	1.0%	21.0	21.7	29%
Filsham Reed Bed LNR	75	2.1	2.8%	22.3	24.4	33%
Marline Wood LNR	75	0.7	1.0%	21.0	21.7	29%
Pebsham Wood Ancient Woodland	75	37.5	50.0%	18.2	55.7	74%
Marshy Grassland and Reedbed Glyne Gap LWS	75	4.9	6.5%	18.2	23.1	31%

Note: PC = Process Contribution; PEC=Predicted Environmental Concentration; AC=Ambient Concentration (2023 Defra NOx backgrounds); EQS = Environment Quality Standards
Arithmetic discrepancies may occur due to rounding of results, and due to differences in worst-case meteorological years

The maximum predicted daily NO_x PCs exceed 1% of the relevant EQS at Combe Haven SSSI, though the PEC does not exceed the EQS. The maximum annual SO2 PCs are below 1% of the EQS at all other modelled Ramsar, SPA, SAC and SSSI sites and below 100% of the EQS at the local wildlife sites. The impact is therefore considered insignificant.

Table 5.12 presents the maximum annual SO_2 PC and PECs. The maximum predicted annual SO_2 PCs exceed 1% of the relevant EQS at Combe Haven SSSI, though the PEC does not exceed the EQS. The maximum annual SO_2 PCs are below 1% of the EQS at all other modelled Ramsar, SPA, SAC and SSSI sites and below 100% of the EQS at the local wildlife sites. The impact is therefore considered insignificant.

Table 5.12: Maximum annual SO_2 critical level results

Receptor	EQS (µg/m^3)	Max PC (µg/m^3)	% PC of EQS	AC (µg/m^3)	PEC (µg/m^3)	% PEC of EQS
Dungeness Romney Marsh and Rye Bay SPA	20	0.1	0.5%	1.0	1.1	6%
Pevensey Levels SAC and Ramsar	20	<0.1	<0.1%	0.8	0.8	4%

Receptor	EQS ($\mu g/m^3$)	Max PC ($\mu g/m^3$)	% PC of EQS	AC ($\mu g/m^3$)	PEC ($\mu g/m^3$)	% PEC of EQS
Hastings Cliffs SAC	20	<0.1	<0.1%	0.7	0.7	4%
Combe Haven SSSI	20	0.6	2.8%	1.0	1.6	8%
Marline Valley Woods SSSI	20	<0.1	0.2%	2.3	2.4	12%
Filsham Reed Bed LNR	20	0.2	1.2%	1.6	1.8	9%
Marline Wood LNR	20	<0.1	0.2%	2.3	2.4	12%
Pebsham Wood Ancient Woodland	20	2.0	10.1%	1.0	3.0	15%
Marshy Grassland and Reedbed Glyne Gap LWS	20	0.4	1.8%	1.0	1.4	7%

Note: PC = Process Contribution; PEC=Predicted Environmental Concentration; AC=Ambient Concentration (2022 Defra SO_2 backgrounds); EQS = Environment Quality Standards
PC presented to two decimal places to show concentrations are not zero
Arithmetic discrepancies may occur due to rounding of results, and due to differences in worst-case meteorological years
The PCs in **bold** cannot be screened out as insignificant according to EA criteria

5.4.2 Assessment of critical loads

Critical loads – eutrophication

Table 5.13 presents the predicted nitrogen deposition rates at ecological receptors, which have been calculated from dispersion modelling and compared with the lower nitrogen critical load for the most sensitive habitat at each site.

The maximum predicted nitrogen deposition PCs do not exceed 1% of the EQS at the SACs, SPAs, Ramsars and SSSIs and are below 100% of the relevant EQS at the local wildlife sites. The impacts are therefore considered insignificant in accordance with the Environment Agency risk assessment guidance.

Table 5.13: Critical load results - nitrogen deposition

Designated site	APIS Habitat[a]	Minimum nitrogen deposition critical load[b]	Maximum ground level concentration of NO_2 (PC) ($\mu g/m^3$)	Total nitrogen deposition from the Site (PC) (kg/ha/yr)	% PC of minimum nitrogen deposition critical load
Dungeness Romney Marsh and Rye Bay SPA	Northern wet heath	5	0.1	0.0	0.3%
Pevensey Levels SAC and Ramsar	No comparable habitat with established critical load estimate available		<0.1	<0.1	NA

Designated site	APIS Habitat[a]	Minimum nitrogen deposition critical load[b]	Maximum ground level concentration of NO_2 (PC) ($\mu g/m^3$)	Total nitrogen deposition from the Site (PC) (kg/ha/yr)	% PC of minimum nitrogen deposition critical load
Hastings Cliffs SAC	No comparable habitat with established critical load estimate available		<0.1	<0.1	NA
Combe Haven SSSI	Carpinus and Quercus mesic deciduous forest	15	0.5	0.2	1.0%
Marline Valley Woods SSSI	Low and medium altitude hay meadows	10	<0.1	<0.1	0.1%
Filsham Reed Bed LNR	Fen, marsh and swamp	5	0.2	0.0	0.7%
Marline Wood LNR	Broadleaved deciduous woodland	10	<0.1	<0.1	0.1%
Pebsham Wood Ancient Woodland	Broadleaved deciduous woodland	10	2.0	0.3	2.8%
Marshy Grassland and Reedbed Glyne Gap LWS	Fen, marsh and swamp	5	0.3	<0.1	1.0%

Note: PC = Process Contribution; PC presented to more than one decimal places to demonstrate change and is not an indication of model accuracy
[a]Each habitat has been classified as either "grassland" or "forest" to determine which conversion factor should be used to calculate dry deposition flux (see Section 3.4.2.1)
Arithmetic discrepancies may occur due to rounding of results, and due to differences in worst-case meteorological years

Critical loads - acidification

Table 5.14 presents the predicted acid deposition rates at ecological receptors, which have been calculated from dispersion modelling and compared with the relevant acidity critical load.

The maximum predicted acid deposition PCs exceed 1% of the EQS at Coombe Haven SSSI and do not exceed 1% of the minimum CLMaxN at the other modelled SACs, SPAs, Ramsars and SSSIs sites. The PEC at Coombe Haven SSSI does not exceed the minimum CLMaxN, therefore the critical load function is not exceeded and this impact is considered insignificant. The modelled PCs are below 100% of the relevant EQS at the local wildlife sites. The impacts are therefore considered insignificant in accordance with the Environment Agency risk assessment guidance.

Table 5.14: Critical load results - acid deposition

Designated site	APIS Habitat[(a)]	Minimum CLmaxN (keq N/ha/yr)	Maximum ground level concentration of NO_2 (PC) (µg/m^3)	Maximum ground level concentration of SO_2 (PC) (µg/m^3)	NO_2 acid deposition PC (keq/ha/yr)	SO_2 acid deposition PC (keq/ha/yr)	Total acid deposition PC (keq/ha/yr)	% PC of minimum CLmaxN	Acid deposition AC (keq/ha/yr)	Acid deposition PEC (keq/ha/yr)	% PEC of minimum CLmaxN
Dungeness Romney Marsh and Rye Bay SPA	Calcareous grassland (using base cation)	4.856	0.096	0.099	0.001	0.012	0.013	0.3%	-	-	-
Pevensey Levels SAC and Ramsar	NA	NA	0.004	0.005	<0.001	0.001	0.001	NA	-	-	-
Hastings Cliffs SAC	NA	NA	0.008	0.008	<0.001	0.001	0.001	NA	-	-	-
Combe Haven SSSI	Unmanaged Broadleafed/Coniferous Woodland	2.932	0.545	0.562	0.011	0.133	0.144	**4.9%**	1.491	1.635	55.8%
Marline Valley Woods SSSI	Unmanaged Broadleafed/Coniferous Woodland	2.928	0.048	0.050	0.001	0.012	0.013	0.4%	-	-	-
Filsham Reed Bed LNR	Fen, marsh and swamp	This habitat is not sensitive to acidity	0.238	0.246	0.002	0.029	0.031	NA	-	-	-

Designated site	APIS Habitat[(a)]	Minimum CLmaxN (keq N/ha/yr)	Maximum ground level concentration of NO_2 (PC) (µg/m^3)	Maximum ground level concentration of SO_2 (PC) (µg/m^3)	NO_2 acid deposition on PC (keq/ha/yr)	SO_2 acid deposition on PC (keq/ha/yr)	Total acid deposition PC (keq/ha/yr)	% PC of minimum CLmaxN	Acid deposition AC (keq/ha/yr)	Acid deposition PEC (keq/ha/yr)	% PEC of minimum CLmaxN
Marline Wood LNR	Broadleaved deciduous woodland	2.928	0.045	0.047	0.001	0.011	0.012	0.4%	-	-	-
Pebsham Wood Ancient Woodland	Broadleaved deciduous woodland	2.932	1.979	2.022	0.041	0.478	0.518	17.7%	-	-	-
Marshy Grassland and Reedbed Glyne Gap LWS	Fen, marsh and swamp	This habitat is not sensitive to acidity	0.347	0.357	0.004	0.042	0.046	NA	-	-	-

Note: PC = Process Contribution; PC presented to more than one decimal places to demonstrate change and is not an indication of model accuracy
(a) Each habitat has been classified as either “grassland” or “forest” to determine which conversion factor should be used to calculate dry deposition flux (see Section 3.4.2.1).
Arithmetic discrepancies may occur due to rounding of results, and due to differences in worst-case meteorological years
NA indicates that no critical load data for this habitat is available on APIS
ACs and PECs are presented only for sites where modelled PCs are potentially significant. Potentially significant PCs are highlighted in **bold**.

6 Conclusions

An assessment has been undertaken to determine the effect of emissions from the combustion of biogas at the CHP and auxiliary biogas boiler at the Site on air quality in the surrounding area using advanced dispersion modelling. For gridded and human health receptors, the emissions of NOx, SO_2 and VOCs have been considered in accordance with Environment Agency guidance. Emissions of NOx and SO_2 and their contribution to nitrogen deposition has also been considered in terms of their impact on nearby ecological sites. The method of the assessment has taken a conservative approach by assuming worst-case conditions for factors such as emission characteristics, the operational hours and meteorological conditions. The modelled concentrations forecast in this assessment are likely to be higher than in practice, due to the worst-case assumptions regarding the combustion operating continuously at full load and the SO_2 emissions adopted for this assessment which are considerably higher than the monitored SO_2 emissions.

No exceedances of the EQSs for NO_2, SO_2 and VOCs for human health receptors are predicted at locations of relevant public exposure. The modelled impacts for VOCs assume a fraction of 100% benzene which is likely to overestimate the modelled benzene concentrations by at least a factor of 10 and is therefore highly conservative.

The air quality effects are highly localised and considered insignificant at sensitive human health in accordance with Environment Agency guidance. Effects from nitrogen deposition and acid deposition at nearby ecological sites are also considered insignificant. The Site does not conflict with the relevant air quality regulations.

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