

## Geoff Dowker

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**Subject:** FW: 2272 - RE: JJC Biomass Part B Application. FINAL NT response to PPC\_B\_35

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**From:** REDACTED [mailto:REDACTED@oaktree-environmental.co.uk]  
**Sent:** 16 April 2019 09:07  
**To:** Geoff Dowker  
**Subject:** 2272 - RE: JJC Biomass Part B Application. FINAL NT response to PPC\_B\_35

Hi Geoff,

Please see below for responses to the National Trust Consultation comments. As you will be aware, some of the issues they have raised are planning and waste permit matters. Please let me know if you have any queries.

### Waste Hierarchy

The justification for fuel to be used in the boiler is not a matter for consideration under the Part B permit, which controls the type of fuel only. It should however be noted that planning consent has been granted for the Waste Transfer Station and boiler by Cumbria County Council and a waste permit has been issued by the Environment Agency. Therefore, compliance with the waste hierarchy will have been required to have been demonstrated as part of other application processes.

### Nitrogen Deposition

In accordance with the part B permit application procedure, the application has considered potential impacts on higher tier ecological receptors, including Duddon Estuary Ramsar/SSSI and Morecambe Bay SAC. In accordance with government permitting risk assessment guidance, impacts were demonstrated to be insignificant. There is no requirement to consider impacts on local nature sites, such as National Nature Reserves (NNR) for Part B permit applications (see Section 6 of the permit application form and the DEFRA LA-IPPC Permitting General Guidance Manual). However, the following provides an appraisal of potential impacts.

Sandscale Haws NNR shares the same approximate Eastern boundary with Duddon Estuary Ramsar/SSSI and Morecambe bay SAC, albeit slightly further from the proposed site. Therefore, we can use the maximum modelled annual nitrogen deposition at Duddon Estuary Ramsar/SSSI and Morecambe Bay SAC to assess potential impacts on Sandscale Haws NNR. The government permitting risk assessment guidance for air emissions advises that impacts on local nature sites (including NNR) can be considered insignificant if the process contribution is less than 100% of the long term environmental standard. It states that there is no need for further assessment if this criteria is met. Using the predictions for Duddon Estuary Ramsar/SSSI and Morecambe Bay SAC, the maximum process contribution to the critical level for annual mean NO<sub>x</sub> will be 3.87% and for 24-hour mean NO<sub>x</sub> will be 19.03% at Sandscale haws NNR. As such, there is no requirement to consider background levels and it can be concluded that impacts will be insignificant in accordance with government air emissions permitting risk assessment guidance. Turning to annual nitrogen deposition, the predicted process contribution to the critical load is 0.98%. As such, there is no requirement to consider background/existing levels of nitrogen deposition and it can be concluded that impacts will be insignificant in accordance with government air emissions permitting risk assessment guidance.

Concern has been expressed about potential impacts during abnormal operation, such as mechanical issues, or when no feedstock is available. If there is no feedstock available, the boiler would not operate and there would be no stack emissions. The boiler will be serviced on a regular basis to minimise risk of mechanical issue. It has been suggested that modelled measurements may not be accurate. Whilst there can be an degree of uncertainty in output from any model, a series of worst case assumptions were made in the modelling assessment, as a result of which, predictions are considered to be conservative:

1. Worst case modelled concentrations across 5 years of meteorological data used in impact assessment.
2. Assumption that plant would emit continuously at the statutory/RHI emission limit level.
3. Assumption that plant would operate continuously for 100% of each year.
4. Worst case assumption for conversion of NOx to NO2 (relevant to deposition calculations).

### Dust Particulate

Given that the boiler and adjacent fuel store are enclosed, fugitive dust emission is not expected to be a significant issue. The handling and processing of wood on the wider site is controlled by the EA under a waste permit and outside the remit of the Part B permit process. However, given that winds are predominantly Westerly, according to the wind rose from Barrow, this actually places the SPA predominantly upwind of the site and therefore in the event that fugitive dust may arise, this would be carried predominantly away from the sensitive site.

### Noise

Noise is not controlled under the Part B permit and therefore is not a matter for consideration in determining the Part B permit application. However, it should be noted that not only is the boiler enclosed, it is within a larger regulated waste site. Noise is a matter for consideration under planning. Planning consent has already been granted for the boiler by Cumbria County Council.

### Monitoring

The frequency of monitoring proposed accords with the requirements of the statutory guidance.

Regards,

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