

1. Introduction

Syntegra were instructed to produce an Air Quality Assessment to support the installation of an energy centre at Five Fords, Wrexham.

It is proposed to install four gas-fired Combined Heat and Power (CHP) units at the site. These have the potential to cause air quality impacts as a result of emissions associated with heat generation. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and assess potential effects during operation. Following submission of the report to Wrexham County Borough Council (WCBC), a consultation response was received from Natural Resources Wales (NRW) (reference: CAS-120950-Q9T6). This included the following in relation to air quality:

"We note that the proposal involves the installation of four gas-fired Combined Heat and Power (CHP) units at the site. As a medium combustion plant, the screening distance for assessing ecological receptors is 5km for European sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) and 2km for Sites of Special Scientific Interest (SSSI).

There report identifies and assesses the following protected sites within the screening distances:

- River Dee and Bala Lake Special Area of Conservation (SAC)
- Johnstown Newt Sites SAC
- Berwyn and South Clwyd Mountains SAC

We agree with the conclusion in respect of aerial emissions that the proposal alone will not have a significant effect on the features of any SSSI/SAC. However, we do not consider that the Air Quality Assessment has appropriately considered potential in-combination/ cumulative impacts on the above named SACs. In light of the Wealden judgement, we advise that (even when the Process Contribution is less than 1%), consideration of other relevant projects may be required to ascertain whether there are possible in-combination effects. We note that there are likely to be other relevant projects which should be considered in-combination, though your authority may be best placed to advise on the list of relevant projects that the applicant should consider.

In view of the above, we have concerns that a significant effect from the proposed development cannot be ruled out. The following requirement needs to be met before allowing the proposed development to proceed. We would object to the planning application if the requirement is not met.

Requirement 4 Protected Sites: Further information (in-combination assessment) is submitted to enable your authority to carry out a Habitat Regulation Assessment (HRA) under regulation 63 of the Conservation of Habitats and Species Regulations 2017 prior to the determination of the planning application."

The potential for in-combination effects at the relevant ecological designations is considered in the following Sections.

Receptors

As indicated in the NRW response, the screening distance for assessing ecological receptors is 5km for European sites, including Special Areas of Conservation (SAC). It is confirmed that Johnstown Newtown Sites SAC and Berwyn and South Clwyd Mountains SAC are 5.4km and 9.5km from the site, respectively. As such, they are outside the relevant screening distance and the potential for in-combination effects can be considered not significant.

River Dee and Bala Lake SAC is 2.0km from the site as the closest point. This is within the screening distance and potential in-combination effects are therefore considered further in the following Section.

In-Combination Assessment

It is a requirement of the Habitats Regulations to consider the impact of projects either alone or in-combination. The 'alone or in-combination' requirement has been included in the Regulations in order to ensure that prior to their authorisation the effects of numerous small proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

Plans or projects that should be considered in the In-Combination Assessment include the following:

- The incomplete or non-implemented parts of plans or projects that have already commenced;
- Plans or projects given consent or given effect but not yet started;
- Plans or projects currently subject to an application for consent or proposed to be given effect;
- Projects that are the subject of an outstanding appeal;
- Ongoing plans or projects that are the subject of regular review;
- Any draft plans being prepared by any public body; and,
- Any proposed plans or projects published for consultation prior to application.

The following resources were reviewed in order to identify any relevant plans or projects for inclusion in the In-Combination Assessment:

- The WCBC planning portal¹;
- The Habitats Regulations Assessment for the Wrexham Local Development Plan 2013 -2028²;
- NRW current consultations - Environmental Permit applications³;
- NRW current consultations - Environmental Permit draft decisions⁴; and,
- NRW environmental permitting decisions monthly report⁵.

¹ <http://planning.wrexham.gov.uk/Planning/lg/GFPlanningSearch.page>.

² The Habitats Regulations Assessment for the Wrexham Local Development Plan 2013 -2028, WCBC, 2016.

³ <https://naturalresources.wales/permits-and-permissions/permit-applications-consultations-and-decisions/current-consultations-environmental-permit-applications/?lang=en>.

⁴ <https://naturalresources.wales/permits-and-permissions/permit-applications-consultations-and-decisions/current-consultations-environmental-permit-draft-decisions/?lang=en>.

⁵ <https://naturalresources.wales/permits-and-permissions/permit-applications-consultations-and-decisions/our-environmental-permitting-decisions-monthly-report/?lang=en>.

The review considered any point sources or any projects likely to significantly increase traffic flows on any roads within 5km and 200m, respectively, of the of the sensitive receptor locations identified within the original Air Quality Assessment. These extents were defined based on the likely limits of pollutant dispersion from industrial and roads sources specified by NRW and the Welsh Government⁶.

The findings of the review can be summarised as follows:

- No proposed developments were identified on the WCBC planning portal that were considered likely to produce point source or traffic emissions within the relevant screening extents;
- The Habitats Regulations Assessment for the Wrexham Local Development Plan 2013 -2028 indicated that River Dee and Bala Lake SAC was not identified as a site that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic. The specific reasoning is not provided. However, it is assumed that as the main habitat is freshwater changes in atmospheric pollution levels were not considered a risk to site integrity; Based on this information, in-combination effects associated with the Local Plan are not considered to be significant;
- Review of NRW current consultations - Environmental Permit applications did not identify any proposed point sources within the relevant screening extents;
- Review of NRW current consultations - Environmental Permit draft decisions did not identify any proposed point sources within the relevant screening extents;
- Review of the environmental permitting decisions monthly report did not identify any proposed point sources within the relevant screening extents;

As shown above, review of the relevant resources did not indicate any relevant plans or projects to be included within the In-Combination Assessment. As such, the predicted air quality impacts presented within the Air Quality Assessment can be considered the total in-combination contributions to pollution levels within the designation. The NRW consultation response states:

"We agree with the conclusion in respect of aerial emissions that the proposal alone will not have a significant effect on the features of any SSSI/SAC"

As the in-combination effects can be considered the same as those associated with the development in isolation, it is therefore concluded that the proposal will not have a significant effect on the features of any SAC either alone or in-combination.

⁶ Design Manual for Roads and Bridges, LA 105 Air quality, Highways England, Welsh Government, Transport Scotland and Department for Infrastructure, 2019.