

Permitting Decisions- Variation

We have decided to grant the variation for Severn Road Resource Recovery Centre – EFW and PRF operated by Viridor Avonmouth Waste Services Limited.

The variation number is EPR/SP3301LA/V003.

The permit was issued on 26.03.2024.

The variation is for increasing the maximum processing capacity of the installation from 376,500 tonnes per annum to 427,050 tonnes per annum, based on operation at 110% Maximum Continuous Rating thermal capacity point via changes to the combustion control system. The variation also includes the addition of a number of non-hazardous waste types permitted for incineration.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It

- highlights key issues in the determination
- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Assessment of the installation's emissions to air (air quality and ecological impacts)

The methodology for risk assessment of point source emissions to air, which we use to assess the risk of applications we receive for permits, is set out in our

guidance *Air emissions risk assessment for your environmental permit* and has the following steps:

- Describe emissions and receptors.
- Calculate process contributions.
- Screen out insignificant emissions that do not warrant further investigation using the Environment Agency's screening tool.
- Decide if detailed air modelling is needed.
- Assess emissions against relevant standards.
- Summarise the effects of emissions.

The methodology uses a concept of 'process contribution' (PC), which is the estimated concentration of emitted substances after dispersion into the receiving environmental media at the point where the magnitude of the concentration is greatest. The methodology provides a simple method of calculating PC primarily for screening purposes and for estimating process contributions where environmental consequences are relatively low. It is based on using dispersion factors. These factors assume worst case dispersion conditions with no allowance made for thermal or momentum plume rise and so the process contributions calculated are likely to be an overestimate of the actual maximum concentrations. More accurate calculation of process contributions can be achieved by mathematical dispersion models, which take into account relevant parameters of the release and surrounding conditions, including local meteorology.

Air dispersion modelling enables the PC to be predicted at any environmental receptor that might be impacted by the plant. Once short-term and long-term PCs have been calculated in this way, they are compared with Environmental Standards (ES).

PCs are considered insignificant if:

- the long-term process contribution is less than 1% of the relevant ES; and
- the short-term process contribution is less than 10% of the relevant ES.

The long term 1% process contribution insignificance threshold is based on the judgements that:

- It is unlikely that an emission at this level will make a significant contribution to air quality; and
- the threshold provides a substantial safety margin to protect health and the environment.

The short term 10% process contribution insignificance threshold is based on the judgements that:

- spatial and temporal conditions mean that short term process contributions are transient and limited in comparison with long term process contributions; and

- the threshold provides a substantial safety margin to protect health and the environment.

Where an emission is screened out in this way, we would normally consider that the Operator's proposals for the prevention and control of the emission to be acceptable. However, where an emission cannot be screened out as insignificant, it does not mean it will necessarily be significant.

For those pollutants which do not screen out as insignificant, we determine whether exceedances of the relevant ES are likely. This is done through detailed audit and review of the Operator's air dispersion modelling, taking background concentrations and modelling uncertainties into account.

Where the PC is greater than these thresholds, the assessment must continue to determine the impact by considering the predicted environmental concentration (PEC). The PEC is the combination of the PC substance to air and the background concentration of the substance which is already present in the environment.

The PECs can be considered 'not significant' if the assessment has shown that both the following apply:

- proposed emissions comply with associated emission levels (AELs) or the equivalent requirements where there is no AEL.
- the resulting PECs will not exceed 100% of the environmental standards

We have audited the consultant's AQA, AEA and HHRA reports and conducted our own check modelling and sensitivity analysis to our observations. As a result, we find that despite differences in numerical predictions, the consultant's predictions and conclusions can be used for permit determination.

The consultant used ADMS 6 air dispersion modelling software to predict impacts of emissions from the facility. They used five years of meteorological data observed at Avonmouth meteorological station (located approximately 4.5 km south-west of the facility) for the years 2016 to 2020. We have tested sensitivity to eight years of meteorological data observed at Bristol Filton meteorological site (located approximately 6.3 km east of the facility) for the years 2003 to 2007 and 2016 to 2018.

We observe:

- The consultant has provided stack emissions data for both flues combined.
- The consultant's emission rates can be replicated by AQMAU.
- The LT (daily) emission concentration used by the consultant for PCBs is higher than that specified by the Best Available Techniques Associated Emission Levels (BAT-AELs) from the Reference Document on the Best Available Techniques (BREF) published in 2019 for an existing plant. The consultant used an emission concentration of 0.005 mg/Nm³ from Table 3.8

of the Waste Incineration BREF published in 2006¹. All other LT emission concentrations (except for PAH, see below) are consistent with BAT-AELs.

- The consultant has assumed all PAHs are Benzo[a]Pyrene (B[a]P) and compared against the PAH B[a]P ES. The consultant used a PAH emission concentration of 0.2 µg/Nm³, based on the maximum recorded emission concentration of PAH at a UK plant from Figure 8.121 of the 2019 Waste Incineration BREF (see note (4) of Table 16 of the AQA report). We agree that this concentration is a reasonable worst-case.
- The consultant used ST emission limit values (ELVs) from the Industrial Emissions Directive (IED) Annex VI Part 32 to calculate ST emission rates for all pollutants except for CO. The consultant used a ST emission concentration of 150 mg/Nm³ for CO.
- The ST abnormal emission concentrations used by the consultant for NO_x, SO₂, HF, HCl, Cd and Dioxins and Furans are above or within the ranges specified in Table 3.6 of the Waste Incineration BREF published in 2019.
- The ST abnormal emission concentration used by the consultant for PM₁₀ is consistent with the half-hourly average emission limit value specified in IED Annex VI Part 3 (point 2).
- The consultant did not provide abnormal emission concentrations for CO and VOCs. We tested sensitivity to abnormal emission concentrations of:
 - 100 mg/Nm³ for CO, as specified in IED Annex VI Part 3 (point 1.5); and
 - 20 mg/Nm³ for VOCs, as specified in IED Annex VI Part 3 (point 1.2).

We have undertaken check modelling using ADMS (Version 6), based on the consultant's modelling files, and included sensitivity analysis of the following:

- Our own meteorological data observed at Bristol Filton meteorological site for the years 2003 to 2007 and 2016 to 2018;
- Use of the maximum half-hourly ELVs stated in the IED to calculate abnormal emission rates for CO and VOCs;
- Higher background concentrations for selected pollutants at human health receptor locations;
- Two additional human health receptors;
- Assessment of PCs against the updated (November 2023) EALs for selected pollutants;
- Additional ecological receptors; and
- Our calculated dioxins and furans emission rates in our HHRA checks.

Impacts on Human Health – Proposed Facility

Whilst our absolute numerical predictions do not entirely agree with the consultant's, considering expected modelling uncertainties, we are satisfied that

¹ Waste Incineration BREF 2006 [superseded_wi_bref_0806_0.pdf \(europa.eu\)](#) [Accessed January 2024]

² Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control). [EUR-Lex - 02010L0075-20110106 - EN - EUR-Lex \(europa.eu\)](#) [Accessed January 2024]

the consultant's predictions at human health receptors can be used for permit determination as a reasonable worst-case.

We agree with the consultant's conclusions that the contributions from the proposed facility are not likely to exceed the ES at any location of relevant exposure for human health under either normal or abnormal operating conditions. We find:

- The maximum predicted PCs for some pollutants are not insignificant (>1% for LT and >10% for ST) at both a maximum impact location and at the maximally impacted receptor. However, the PECs for these pollutants are unlikely to exceed the ES.
- The maximum predicted PCs for all other pollutants are insignificant (<1% for LT and <10% for ST) against the relevant ES.

In November 2023, updated EALs were published in our guidance¹⁶ for 1,3-butadiene, Cd, chromium III (CrIII), Cu, Hg and Ni. We tested sensitivity to these EALs in our check modelling. For the proposed facility at a maximum impact location, we find:

- Under normal operating conditions:
 - The maximum predicted LT PCs for Hg and CrIII are likely to be insignificant (<1%) against the updated EALs. For those pollutants that do not have insignificant (>1%) LT PCs (1,3-butadiene, Cd, Cu and Ni), the predicted PECs do not exceed the updated EALs.
 - The maximum predicted ST Hg, Cd and Ni PCs are insignificant (<10%). ST 1,3-butadiene PCs are not insignificant (>10%), however the PEC is not likely to exceed the updated EAL (note that this is based on an absolute worst-case assumption that all VOC emissions are 1,3-butadiene. With appropriate VOC speciation, the considered risks are likely to be greatly reduced).
- Under abnormal operating conditions:
 - The updated EALs for Hg, Cd and Ni are not predicted to be exceeded.
 - At a maximum impact location, there is potential for the 1,3-butadiene ST EAL to be exceeded. However, this is assuming that all VOC emissions are 1,3-butadiene and abnormal emissions coincide precisely with the worst daily meteorological conditions. Therefore, it is unlikely that there will be an exceedance of the revised ST 1,3-butadiene EAL if one or more of these factors were appropriately accounted for.
 - The ST abnormal 1,3-butadiene PC at the maximally impacted receptor is not insignificant (>10%), however, the PEC is not likely to exceed the updated EAL.

Our HHRA check modelling indicates that the predicted intakes are likely to be below the 10% insignificance criterion agreed with UKHSA (formally Public Health England). This also applies to any increased emissions of dioxin, furans and dioxin-like PCB during worst-case abnormal operations.

Impacts at Ecological Sites – Proposed Facility

Whilst our absolute numerical predictions do not entirely agree with the consultant's, considering expected modelling uncertainties, we are satisfied that the consultant's predictions at ecological sites can be used for permit determination as a reasonable worst-case.

We agree with the consultant's conclusions that PCs from the facility are either insignificant or do not exceed the relevant critical levels at all ecological sites assessed, under either normal or abnormal operating conditions. We find:

- Our maximum predicted annual NO_x, annual NH₃ and daily NO_x PCs are not insignificant (>1% for LT and >10% for ST) at Severn Estuary SAC, SPA, Ramsar site and SSSI, however, the PECs do not exceed the relevant critical levels.
- At Avon Gorge Woodlands SAC and River Wye SAC, our maximum predicted annual NO_x, annual NH₃ and daily NO_x PCs are insignificant (<1% for LT and <10% for ST) against the relevant critical levels.
- Our maximum predicted annual SO₂, daily HF and weekly HF PCs are insignificant (<1% for LT and <10% for ST) against the relevant critical levels at all European sites and SSSIs assessed.
- At local nature sites, our maximum predicted PCs for annual NO_x, annual NH₃, annual SO₂, daily NO_x, daily HF and weekly HF are insignificant (<100%) against the relevant critical levels.

Regarding nutrient nitrogen deposition:

- We calculated the nutrient nitrogen deposition PCs using the maximum annual NO_x and annual NH₃ PCs in the relevant nitrogen-sensitive habitat locations within the ecological sites assessed. We identified the nitrogen-sensitive habitat locations using Natural England's Priority Habitat Inventory map.¹⁹
- Against the lower critical load for coastal saltmarsh (10 kgN/ha/yr), we find that our maximum PC is not insignificant (>1%) at Severn Estuary SAC, SPA, Ramsar site and SSSI, and background deposition exceeds the lower critical load.
- Against the upper critical load for coastal saltmarsh (20 kgN/ha/yr), we find that our maximum PC is not insignificant (>1%) at Severn Estuary SAC, SPA, Ramsar site and SSSI, however, the PEC does not exceed the upper critical load.
- At Avon Gorge Woodlands SAC and River Wye SAC, our maximum predicted PCs are insignificant (<1%) against the relevant critical loads. We assessed PCs at River Wye SAC against the lower critical loads for both "raised and blanket bogs" and "saltmarsh" habitats (5 kgN/ha/yr and 10 kgN/ha/yr respectively).
- At local nature sites, our maximum predicted PCs are insignificant (<100%) against the relevant critical loads.
- We therefore consulted with the EA HRA team regarding the relevant critical loads and background deposition values at Severn Estuary SAC, SPA, Ramsar and SSSI and River Wye SAC.

Regarding acid deposition:

- Our checks of APIS indicate that there are no critical loads available for “saltmarsh” habitats. Hence, at Severn Estuary SAC, SPA, Ramsar site and SSSI, we assessed acid deposition PCs against critical loads for “calcareous grassland”.
- In the absence of critical loads for “saltmarsh” habitats, we assessed acid deposition PCs against critical loads for “transition mires and quaking bogs” at River Wye SAC.
- Our maximum predicted PCs are insignificant (<1%) against the relevant critical loads at all European sites and SSSIs assessed, notably including River Wye SAC.
- At local nature sites, our maximum predicted PCs were insignificant (<100%) against the relevant critical loads.

Impacts of the proposed facility compared to the operational facility

We assessed the impacts of the operational facility (incinerating 376,500 tonnes per annum of waste) and compared the impacts to those of the proposed facility (incinerating 427,050 tonnes per annum of waste). We find that:

- Regarding human health, maximum PCs for all pollutants increase, however, the increase in waste incineration capacity of the facility does not lead to any exceedances of the ES or of the updated EALs.
- Regarding impacts at ecological sites for the operational facility:
 - Maximum PCs for annual NO_x, annual NH₃, daily NO_x and nutrient nitrogen deposition are not insignificant (>1% for LT and >10% for ST) at Severn Estuary SAC, SPA, Ramsar site and SSSI. However, the critical levels and critical loads are not predicted to be exceeded as a result of the increase in waste incineration capacity for the facility.
 - Maximum PCs for annual SO₂, daily HF, weekly HF and acid deposition are insignificant (<1% for LT and <10% for ST) against the relevant critical levels and critical loads at all European sites and SSSIs and remain insignificant following the increase in waste incineration capacity.

Findings of the Habitats Regulations Assessment

In support of the application, the applicant provided a detailed air emissions modelling report. Below are tables 1 & 2 showing the modelling results for the emissions considered.

As can be seen, numerous pollutants exceed the thresholds that indicate a likely significant effect and so for those pollutants, an appropriate assessment is required in order to determine whether there is a risk of adverse impact on the notified features of the designated sites.

Where pollutants exceed the significance thresholds, the Air Pollution Information System (APIS) was used to determine which notified features were sensitive to

the risk either directly or through effects on their broad habitat. If APIS listed the feature as not sensitive '(or did not indicate a suitable critical load), 'no effect' was recorded in section 7 of this assessment and those features do not require being taken through to the appropriate assessment.

Table 1: Acid deposition results for all designated sites.

Site	Acidity Class	Deposition velocity	PC									Proposed Facility PEC	
			Operational Facility			Proposed Facility			Change				
			N keq/ ha/yr	S keq/ ha/yr	% CL	N keq/ ha/yr	S keq/ ha/yr	% CL	N keq/ha/ yr	S keq/ha/ yr	% CL	Total keq/ha/ yr	% of CL
E1 Severn Estuary SAC, SPA, Ramsar, SSSI	No CL function defined	Grassland	0.033	0.053	-	0.033	0.054	-	0.0002	0.0004	-	0.09	-
E2 Avon Gorge Woodlands SAC	Calcareous grassland (using base cation)	Grassland	0.002	0.003	0.10%	0.002	0.003	0.11%	0.0002	0.0002	0.01%	1.18	24.4%
	Unmanaged Broadleaved/Coniferous Woodland	Woodland	0.004	0.006	0.80%	0.004	0.006	0.85%	0.0002	0.0004	0.05%	1.97	161.7%
E3 River Wye SAC	Dwarf shrub heath	Grassland	0.002	0.003	0.10%	0.002	0.003	0.10%	0.0002	0.0002	0.01%	1.72	34.1%
	Bogs	Woodland	0.004	0.006	1.89%	0.004	0.006	2.02%	0.0002	0.0004	0.13%	2.53	519.3%

For acid deposition at the Severn Estuary SAC, SPA & Ramsar, there is no Critical Load for the habitat chosen by the applicant. Internal consultation with AQMAU, along with review of the Public Habitat Inventory (PHI) showed that at the point of impact, coastal saltmarsh was present. However as there is no critical load for coastal saltmarsh either, it was determined appropriate to use the CL for calcareous grassland (0.856keq/ha/yr). Using this CL, the PCs were found to be 0.4% of the CL and therefore screened out as insignificant.

For acid deposition at the River Wye SAC, the applicant argued that it was highly unlikely that bog woodland would be present at the receptor location and therefore the exceedance of the significance threshold for that habitat would not lead to any impact. Our check of the PHI indicated that saltmarsh habitat is present at the receptor location. As there is no Critical Load for saltmarsh, this is not a feature of the SAC, nor is there any notified habitat present at the receptor location which is sensitive to acid deposition (the most relevant would be transition mires and quaking bogs, however according to Natural England's site information, this habitat is only present at the headwaters, which is a significant distance away), it can be concluded that there will be no effect from the proposal.

Table 2: Nutrient deposition results for all designated sites.

Site	NCL class	Deposition velocity	PC						Proposed Facility PEC	
			Operational Facility		Proposed Facility		Change			
			N dep kgN/ha/yr	% of Lower CL	N dep kgN/ha/yr	% of Lower CL	N dep kgN/ha/yr	% of Lower CL	PEC N dep kgN/ha/yr	% of Lower CL
E1 Severn Estuary SAC, SPA, Ramsar, SSSI	Atlantic upper-mid & mid-low salt marshes	Grassland	0.29	2.88%	0.29	2.90%	0.002	0.02%	17.6	176.1%
E2 Avon Gorge Woodlands SAC	Semi-dry perennial calcareous grassland (basic meadow steppe)	Grassland	0.03	0.33%	0.03	0.35%	0.002	0.02%	15.1	150.5%
	Carpinus and Quercus mesic deciduous forest	Woodland	0.05	0.35%	0.06	0.37%	0.003	0.02%	25.7	171.0%
River Wye SAC	European dry heaths	Grassland	0.03	0.62%	0.03	0.66%	0.002	0.04%	23.0	460.8%
	Raised and blanket bogs	Woodland	0.05	0.98%	0.05	1.05%	0.003	0.07%	34.3	685.2%

Nutrient nitrogen deposition results exceed the thresholds for significance based on the applicant's modelling results. As previously mentioned, raised and blanket bogs is not an appropriate habitat to use for the River Wye SAC receptor location. Saltmarsh is more appropriate as it is present at the location and when PCs were compared to the lower CL for that habitat, they were found to screen out as insignificant.

In summary, there are no likely significant in-combination effects resulting from short or long term NOx levels or ammonia to the Severn Estuary designated sites.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Planning
- Health and Safety Executive
- Director of Public Health
- UK Health Security Agency

The comments and our responses are summarised in the consultation responses section.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have consulted Natural England and Natural Resources Wales on our Habitats Regulation assessments and taken their comments into account in the permitting decision.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be screened out as environmentally insignificant.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that screen out as insignificant

Emissions of all pollutants (see Key Issues of the Decision) have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Fire prevention plan

The installation has an approved Fire Prevention Plan. The variation does not result in any changes to the quantity or arrangements for the storage of waste at the Facility. As such, there will be no increased fire risk associated with the storage of waste at the Facility.

Therefore, we haven't requested a revised Fire Prevention Plan at this time, but we will request one in the future if we consider the site poses a risk of fire.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

Emission limits

No emission limits have been added, amended or deleted as a result of this variation.

The current emission limits were applied in Variation V002 and are in accordance with the current BAT ELVs for incineration plant.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Technical competence

We are satisfied that the operator is technically competent.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from UKHSA.

Brief summary of issues raised:

The applicant reports that proposed modelled emissions to air of chromium are insignificant when emission monitoring for the current site is taken into account. UKHSA recommends that the EA should give further consideration to future emission monitoring and ensure that concentrations of chromium are confirmed to be acceptable.

UKHSA are unable to identify any assessment of metal deposition in line with EA guidance (<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmentalpermit#>)

[calculate-pc-for-substance-deposition](#)). UKHSA recommends that the EA ensure they are satisfied that an appropriate risk assessment has been undertaken.

The applicant has proposed the inclusion of additional waste types within the permit variation and notes that the proposed changes will not result in an increased odour risk from the facility; therefore, no odour management plan has been submitted with the application. UKHSA notes that the proposed waste types are potentially odorous and have not had sight of any existing odour management plan, nor any record of odour complaints associated with the facility. UKHSA recommends that the EA ensures they are satisfied that the existing odour management plan is sufficient considering the additional proposed odorous waste types.

Summary of actions taken:

With regard to emissions to air of chromium, the Operator has already satisfactorily complied with Improvement Condition IC4 concerning the assessment of the impact of emissions to air from chromium VI. The air dispersion modelling supplied with the application has been assessed by AQMAU and we are satisfied that emissions are likely to be insignificant.

Concerning the assessment of metal deposition, the guidance referred to regards screening prior to detailed modelling. If the PECs exceed at the screening stage, then the applicant should complete detailed modelling, which they have done. The Environmental Assessment Levels (EALs) we assess against for metals are protective, hence we do not need to complete a separate assessment for metal deposition. If fisheries are nearby the site (typically within 10 km), then we can do additional checks for methyl mercury. Section 3.24 of the AQMAU report states: "The Environment Agency has an agreed position with the UK Health Security Agency (UKHSA) that intakes from certain metals only need to be assessed if fish consumption is a significant pathway; otherwise, the environmental standards for air emissions are protective for human health." As mentioned in the report, there are no game fishing lakes within 10 km of the facility, therefore intakes from certain metals do not need to be assessed in the HHRA.

Concerning odour risk, the installation complies with BAT 21 of the European Commission BAT conclusions for incineration as detailed in document reference C(2019) 7987 for the prevention/reduction of diffuse emissions (including odour). Any potential odours from the storage of the waste materials are extracted from the above waste bunker and used as combustion air within the furnace, thereby destroying any potential odorous compounds. We are therefore satisfied that the additional waste types will not result in any increased risk of odorous emissions. Condition 3.4 of the permit requires the Operator to provide an odour management plan should the activities give rise to odour pollution.

Response received from Natural England.

Brief summary of issues raised:

Natural England is happy to accept the findings of the HRA, the draft conclusion of the HRA (Item 21) and to support the Agency's recommendation to grant permission.