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Gary Tomsett  
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Wiltshire  
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Your Ref: 14/12003/WCM

Our Ref CIRIS 45991

09 November 2018

Dear Mr Tomsett,

**Planning Application 18/03816/WCM**

**Revision of the layout and design of Advanced Thermal Treatment Facility permitted under consent 14/12003/WCM**

**Address: Northacre Renewable Energy Stephenson Road Northacre Industrial Estate Westbury Wiltshire BA13 4WD**

Thank you for consulting Public Health England (PHE) on the above application.

We understand that the proposed development relates to an application for the revision of the layout and design of the Advanced Thermal Treatment Facility permitted under consent 14/12003/WCM at Stephenson Road, Westbury. It uses advanced thermal treatment technology to generate and export electricity and heat. It will process 48,000 tonnes of solid recovered fuel (SRF) and 112,000 tonnes of mixed commercial and industrial waste that would otherwise be landfilled in Wiltshire or exported to mainland Europe as solid recovered fuel (SRF).

We are conscious that if a planning permission is granted, the activity on site will also be subject to a permit issued by the Environment Agency under the provisions of the Environmental Permitting Regulations 2016. Additionally, emissions and impacts from the gasification process and ancillary waste handling activities will be governed by those conditions stipulated in that permit. The same regulations require the operator to use the best available technology to ensure that impacts from the site are minimised and are compliant with UK and EU air quality and emissions standards.

For that reason we have limited our consideration at the planning stage to the principle of land use, a consideration of the Environmental Impact Assessment (EIA) approach adopted by the applicant and type and range of submitted assessments.

### **PHE Position Statement**

PHE has published a position statement on incinerators but we note that this application is specifically for a gasification process. This process differs from straightforward combustion and consequently the incineration position statement is not considered applicable in these circumstances. Details of the differences between incineration and thermal treatment can be found in the DEFRA publication Energy from waste, A guide to the debate, February 2014 (revised edition), pages 35 to 38. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/284612/pb14130-energy-waste-201402.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf)

### **Impacts during construction**

As with any development there may be some localised short term impacts during the construction phase of the project. We note however, that a construction and management plan (CEMP) is included with the application and are happy that such impacts can be adequately managed by normal control measures and the use of industry good practice. Should issues such as noise or dust impacts arise during construction existing regulatory controls are considered adequate.

### **Air Quality**

The applicant has modelled likely emissions from the site and considered the impact on local air quality. There are a number of sensitive receptors within 2km of the proposed plant including a powdered milk production facility, residential premises, commercial premises, recreation areas, schools and care homes. The submitted assessments have identified these receptors and assessed the impact of a range of emissions from the plant. No significant impacts have been identified in the documentation and PHE is satisfied that the applicant is utilising a model and assessment criteria that are in line with UK guidance and good practice.

There is an Air Quality Management Area (AQMA) in Westbury, declared on the basis of nitrogen dioxide, but we note that the predominant source of NO<sub>2</sub> in that area is vehicular traffic. The submitted assessments indicate that the additional contribution from either traffic associated with the proposed development or from stack emissions is likely to be small and consequently is unlikely to have a significant impact on public health.

On the basis of the information submitted with the application PHE is satisfied that the development/process should be capable of operating within the requirements of current UK regulations, air quality standards and emissions standards. Detail of the regulatory control, emissions requirements and monitoring requirements will be

considered in more detail as part of the environmental permitting process; however, on the basis of the information submitted to date PHE would be unable to sustain any objection to the development on the grounds of air quality.

### **Transport Impacts**

PHE has only considered the impact of traffic on air quality and does not wish to comment on other matters such as noise although we note that as a result of the existing traffic burden the predicted increase in overall traffic levels as a result of both the construction and operational phases is predicted to be small. We are not in a position to assess the accuracy of the traffic predictions and should Wiltshire Highways department disagree with the applicants estimates we would be happy to reconsider this matter based on any new evidence.

### **Controlled Waters**

The development/process is handling waste and consequently there is a potential for this to impact on the local environment and controlled waters. This matter is however better assessed by the Environment Agency and will be addressed by suitable permit conditions.

### **Contaminated Land**

The applicant has submitted a site investigation report and no significant levels of ground contamination were identified. The CEMP should include a section on the management of contaminated soils if they are encountered during the development and consequently PHE is satisfied that historic contamination does not pose a risk to public health

### **Noise**

PHE does not provide comments on noise at the present time.

### **Conclusion**

PHE is satisfied that the applicant has approached the environmental impact assessment in a manner consistent with the UK requirements. They have utilised a satisfactory approach and methodology to predict the likely emissions, distribution of a range of key pollutants and the impact on the local environment and receptors.

PHE will further consider the emissions and appropriate control measures when we are consulted as part of the Environmental Permitting process and will make additional comments at that time. We are however satisfied that the applicant has demonstrated that the proposed development can be carried out without any

significant impact on health, subject to compliance with UK air quality and emission standards. For that reason we do not wish to raise any objection to this planning application.

We note that there appears to be some local opposition to the application and recommend that you liaise closely with your council's public health and health and wellbeing teams. This will ensure that they are aware of the application and local concerns and assess the wider public health implications and impacts on the local community.

If you have any questions or require any clarification please do not hesitate to contact us.

Yours sincerely

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