

11 March 2021

Kate Thomas
Environment Agency
By Email Only

Our Ref: 416.00798.00038

Your Ref: PAN-013001

Dear Kate,

RE: *POWYS COUNTY COUNCIL (PCC) – ENVIRONMENTAL PERMIT APPLICATION, DULY MAKING RESPONSE*

We are writing on behalf of Powys County Council (PCC) in response to the request for further information issued on 1st March 2021, in support of the Environmental Permit (EP) application for the North Powys Bulking Facility, Abermule.

For clarity, the questions from Natural Resources Wales (NRW) are listed below in italics with the response from SLR shown in blue.

1. *Environmental Risk Assessment.*

The risk assessment has not identified all sensitive receptors within the relevant distance. The screening distance for non-landfill waste activities for Sites of Special Scientific Interest (SSSI) is 2km from the site boundary. Hollybush Pastures (SSSI) is within 2km of the site boundary. In addition to this a local wildlife site – Dolforwyn Castle (within 1km) has not been identified as a sensitive receptor.

Action: Provide a revised environmental risk assessment that includes and considers the above sensitive receptors.

SLR Response

The environmental risk assessment has been updated to include;

- Hollybush Pastures Site of Special Scientific Interest (SSSI) situated approximately 1,350m north west of the site (in Section 3.5.1); and
- Dolforwyn Castle Local Wildlife Site has also been identified approximately 940m north west of the site's boundary (in Section 3.5.4).

The Environmental Site Setting drawings have been updated to reflect the changes. Drawing 001A shows the surrounding land uses and local receptors within 500m and 1km. A new Drawing 001B has been prepared which illustrates cultural and natural heritage receptors within 2km of the site's boundary.

The updated ERA is included as Enclosure 1 and Drawings 001A and 001B are included as Enclosure 2.

2. Noise Impact Assessment.

The noise impact assessment should include all information within Section 12 of BS 4142:2014. The noise impact assessment submitted does not include all of the information, including (but not limited to): Wind direction during noise monitoring, Statement of qualifications, competency, professional memberships and experience directly relevant to the application of this British Standard of all personnel contributing to the assessment.

In addition to this the noise impact assessment does not include the following, in accordance with BS 4142:2014: Context of the site has not been considered, The level of uncertainty in the data and the associated calculations has not been considered, Modelling files (CadnaA software) have not been submitted.

Action: Provide a revised noise impact assessment that includes the above information in accordance with BS 4142:2014 and submit the modelling files.

SLR Response

The noise impact assessment has been updated to include all information detailed in the above request in accordance with BS 4142:2014, to summarise;

- Section 4.1.3 has been updated to include the wind directions during monitoring;
- Section 9.0 has been included to illustrate the statement of qualifications and competency;
- Section 5.5 has been updated to consider the context of the site; and
- Section 6 has been included to consider potential uncertainties.

The updated noise impact assessment and modelling files are included as Enclosure 3.

3. Dust and Emissions Management Plan.

The dust and emissions management plan includes residential receptors but does not include all local receptors within 1km of the site including (but not limited to): Protected species, Abermule County Primary School, River Severn and Caravan Park.

Action: Provide a revised dust and emissions plan that includes all local receptors, produced in accordance with the guidance.

SLR Response

Section 1.1.1 (Human Receptors) of the dust and emissions management plan states that “The closest human receptors considered to be sensitive to dust and other emissions such as NO₂ from onsite mobile plant and offsite road vehicles are presented in Table 1-1.”

Therefore, it is not necessary to identify additional human receptors which are located at a greater distance than those already identified such as Abermule County Primary School and the Caravan Park.

Sensitive ecological sites within 1km of the site are either already covered in Section 1.1.2 (Ecological Receptors) or are not considered to be sensitive. Therefore, sensitive local receptors are already considered by the dust and emissions management plan.

Yours sincerely
SLR Consulting Limited



Samantha Pople
Principal Consultant – Environment Management, Permitting & Compliance

CC
Debbie Palfrey – WRAP Cymru

Enc
Enclosure 1 – Updated environmental risk assessment
Enclosure 2 – Updated Drawings 001A and 001B – Environmental Site Setting
Enclosure 3 – Updated Noise Impact Assessment and modelling files.