

Mr Kevin Ashcroft
Permitting Officer
Natural Resources Wales
Wales Permitting Centre (Cardiff)
Cambria House
29 Newport Road
Cardiff CF24 0TP

Your Ref/Eich Cyf:
Our Ref/Ein Cyf: CB/PR
Contact/Cysylltwch â: Chris Burns
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Date/Dyddiad: 4th October 2016

Dear Mr Ashcroft

Environmental Permit Application no: PAN-000061

Applicant: Hazrem Environmental Limited

Facility: Nine Mile Point Waste Transfer Facility, Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly, NP11 7HZ

I refer to the above Environmental Permit Application by Hazrem Environmental Limited and write to register with you our concerns regarding the proposed installation.

As you are aware the local community have raised a number of concerns regarding emissions to air particularly during thermal inversion climatic conditions. We are aware that Natural Resources Wales have undertaken AQMRAT modelling using input parameters supplied by the applicant. This modelling indicates that temperature inversion conditions may occur approximately 150 times a year and that under those conditions there will be a significant increase in nitrogen dioxide at residential and commercial premises in the vicinity.

We understand that it is not predicted that Air Quality Objectives will be exceeded. However, whilst Air Quality Objectives may be seen as UK Government policy targets we believe it is accepted that they should not be seen as limits which it is acceptable to pollute up to. The modelling undertaken by NRW predicts large short term increases in potential nitrogen dioxide exposure for both residents in the vicinity as well as employees at commercial premises. Residents with pre-existing health conditions are likely to be additionally susceptible to the effects of air pollution exposure. We draw your attention to the evidence of the impact of air pollution on public health summarised in the recent Royal College of Physicians report (*Every breath we take; The Lifelong impact of air pollution*). This report suggests that air pollution may be contributing to up to 40,000 deaths in the UK each year. In addition the review by Mills et al (BMJ Open 2015;5) which established that there are positive and statistically significant associations between short-term exposure to NO₂ and mortality and hospital admissions for a range of respiratory and cardiovascular diseases in different age groups is particularly relevant to this application.

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The new modelling data, not available to the Council or other agencies at the time of the planning application, evidences significant short term increases in air pollution. I am aware that the Executive Director for Public Health at Aneurin Bevan University Health Board has advised you that there is now strong evidence from the new modelling data that the development will cause significant short term local air quality deterioration and is likely to have an adverse health and well-being impact. In the light of this new evidence we therefore urge Natural Resources Wales to consider all of this evidence of the impact on the health of local residents and employees working in the vicinity when you determine the environmental permit application.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Chris Burns'.

Chris Burns
Interim Chief Executive