

Fiona Kinghorn  
Cardiff and Vale University Health Board  
Heath Park  
Cardiff  
CF14 4XW

**Our ref:** PAN-000869  
**Your ref:** B2VX095  
**Date:** 28<sup>th</sup> September 2017

Dear Fiona,

**Environmental Permitting (England and Wales) Regulations 2016:  
Application for a wood gasification facility at Woodham Road, Barry, CF63 4JE**

Thank you for your consultation response dated 17 August 2017. We acknowledge that you have no objection to the proposed Biomass 2 facility, further that the facility, if managed well will not impact the local community or have significant impacts on local air quality.

However, we felt that it would be helpful if we addressed the comments and recommendations that you have provided in your consultation response and provide further clarification around the points you raised.

With regards to the air quality assessment and the statements made that there is “*no known ‘safe’ limits of exposure*” and that “*the applicant needs to demonstrate this process will not significantly add to the burden of air pollution*”. NRW are in the process of assessing the Air Quality Assessment and modelling submitted by the applicant and are yet to reach a final decision on this matter.

You state that “Several pollutants (such as Nitrogen Dioxide and particulate matter) associated with this process are non-threshold pollutants, which means there are no known ‘safe’ limits of exposure”. Even though this may be the case, there are limits for these pollutants that are set by the European Union and UK government and assessment and regulation are based on these limits. The Air Quality Assessment submitted by the applicant shows that these limits won’t be exceeded, but as previously stated, our assessment is ongoing.

The recommendation that you make regarding emissions from transport is outside of the scope of the Environmental Permitting (England and Wales) Regulations 2016 and cannot be considered as part of the determination process.

The cumulative impacts of other emissions is being considered as part of the audit of the Air Quality Assessment and will be addressed as part of the determination. However, the current background concentrations of pollutants that are emitted from the installation have been included in the applicant's Air Quality assessment, this covers emissions from other developments and has therefore been considered by the applicant.

Regarding the new recommendations in your response, firstly that the Human Health Risk Assessment (HHRA) has not been revised. The HHRA is based on the predicted concentrations from the model. If the predicted concentrations are not significantly changed, then the revision of the HHRA is not necessary. The submitted Schedule 5 notice response shows that the predicted concentration changes are not significant and therefore the HHRA does not need to be revised, but as stated earlier this is still being assessed.

Your second point references noise mitigation and ensuring that this is in place prior to operation. This would be dealt with by way of permit conditions and pre-operational conditions that will ensure the applicant carries out the work outlined in the noise assessment.

Yours sincerely



**Saul White**

**Senior Permitting Officer – Regulated Industry**

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Correspondence welcomed in Welsh and English