



PRESALL UNDERGROUND GAS STORAGE FACILITY, LANCASHIRE

**Infrastructure Planning Commission (IPC) Application
Reference Number: EN030001**

**STATEMENT OF COMMON GROUND BETWEEN HYDER
CONSULTING (UK) LIMITED (ON BEHALF OF HALITE ENERGY
GROUP LIMITED) AND WYRE BOROUGH COUNCIL ON THE
TOPIC OF AIR QUALITY**

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1 INTRODUCTION

1.1.1 This is a Statement of Common Ground (SoCG) between Hyder Consulting (UK) Limited (Hyder) (on behalf of Halite Energy Group Limited) and Wyre Borough Council (WBC) on the topic of Air Quality.

1.1.2 Air Quality has been the subject of discussions between Hyder (on behalf of Halite Energy Group Limited) and WBC at the pre-Development Consent Order (DCO) Application stage. Further discussions between WBC and Hyder have been held since the DCO Application was accepted for Examination. The aim of these discussions was, where possible, to reach a common ground in relation to the following DCO Application Documents:

- Chapter 6: Air Quality of Volume 1A of the Environmental Statement (ES) (DCO Application Document Reference 5.1)
- Appendix 6.1 of Volume 1B of the ES (DCO Application Document Reference 5.2)
- Figure 6.1 of Volume 2B of the ES (DCO Application Document Reference 5.4)

2 ACCEPTED DATA

2.1 Assessment Methodology

2.1.1 The methodology sets out the approach to the Air Quality assessment, and is presented within Section 6.3 of Volume 1A of the ES.

2.1.2 The assessment methodology is considered appropriate and agreed.

2.2 Baseline Information

2.2.1 Sections 6.4 and 6.5 of Volume 1A of the ES present the existing and future baseline information, respectively, that has been considered in relation to the Air Quality assessment.

2.2.2 The baseline information is considered appropriate and agreed.

2.2.3 Although the baseline information is considered appropriate and agreed, WBC requires confirmation regarding baseline traffic data and background pollutant concentrations. Such confirmation is provided below.

Vehicle Exhaust Emissions (in connection with baseline traffic data)

2.2.4 WBC comments that the traffic modelling inputs provided within Tables 1-1 and 1-2 of Appendix 6.1 of Volume 1B of the ES do not appear to correlate with the baseline traffic data provided within Chapter 16: Transport and Access of Volume 1A of the ES, and that an explanation as to the source of the data used should be provided, including, where applicable, an explanation as to the methodology used to amend this data for the purposes of the assessment.

2.2.5 Hyder confirms that the traffic data used within the air quality assessment is based on a 24-hour Annual Average Daily Traffic (AADT) flow, but that the data within Chapter 16: Transport and Access of Volume 1A of the ES is presented as a 10-hour average (between the hours of 08:00 and 18:00), and therefore the data should not directly correlate. The data has been derived from the same source and differs only due to the different averaging times. WBC is satisfied with this response.

2.2.6 WBC notes that the traffic data contained within Chapter 16: Transport and Access of Volume 1A of the ES is said to have been compiled with regard to the likely impact of the consented Wyre Power Development (Hillhouse International Site). WBC requires confirmation as to how consideration was given to the impact of this development within the air quality assessment, and whether or not any other recently consented significant developments within the locality of the Project have been equally considered.

2.2.7 Hyder confirms that the traffic data used within the air quality assessment is the same as that utilised within Chapter 16: Transport and Access of Volume 1A of the ES (refer to Section 2.2.5 of this SoCG) and is therefore based on the same assumptions. The potential impacts as a result of the Wyre Power Development are considered within Section 7.3 of the Transport Assessment (Appendix 16.1 of Volume 1B of the ES). The Wyre Power Development and

other developments have been considered in Chapter 18: Cumulative Effects of Volume 1A of the ES. WBC is satisfied with this response.

Background Pollutant Concentrations

- 2.2.8 WBC notes that although paragraph 6.4.9 of Chapter 6: Air Quality of Volume 1A of the ES refers to the averaging of Defra's predicted background pollutant concentrations for the purpose of deriving a predicted background concentration for each pollutant of concern, no information is provided as to how many (and which) background concentrations were used to calculate the final values provided within Table 6-14 of Chapter 6. WBC comments that as the DCO Application site spans a large area of the Borough, passing through both urban and rural districts, it would seem inappropriate to derive just one figure for comparison within the assessment, particularly when the underlying traffic data has been split into two sites. WBC therefore requires justification for the methodology used, together with reference to the individual data used to compile each background concentration.
- 2.2.9 Hyder confirms that paragraph 6.4.9 of Chapter 6: Air Quality of Volume 1A of the ES presents averages for each pollutant for the whole DCO Application area, which has been provided as a general overview of pollutant concentrations in the area and has not been used within the modelling. Background concentrations for each receptor were obtained from the Defra website, which provides predictions of background pollutant concentrations on a 1 kilometre x 1 kilometre grid basis. Concentrations were obtained for the grid square in which the receptor was located. Appendix 6.1 of Volume 1B of the ES details all the background concentrations used for each receptor. WBC is satisfied with this response.

2.3 Mitigation and Enhancement Measures

- 2.3.1 Mitigation and enhancement measures are identified within Section 6.8 of Volume 1A of the ES.
- 2.3.2 The mitigation and enhancement measures are agreed.
- 2.3.3 Although the mitigation and enhancement measures are agreed, WBC requires confirmation regarding the mitigation of fugitive dust emissions. Such confirmation is provided below.

Fugitive Dust Emissions

- 2.3.4 WBC notes that impacts of fugitive dust emissions are predicted to range from negligible to moderate adverse (in the worst case), and that a Construction Environmental Management Plan (CEMP) is therefore proposed to be compiled so as to manage the potential impact. WBC comments that the CEMP should be agreed in writing with the Local Planning Authority prior to the commencement of any works on site, and should include provision for the installation of dust monitoring stations at agreed worst case receptor sites, for the duration of the construction phase. This will allow both the Applicant and the Local Planning Authority to monitor the success of the agreed mitigation

measures and ensure that dust emissions do not reach the level at which a statutory nuisance may result.

- 2.3.5 This is noted and agreed by Hyder. Hyder confirms that the Draft DCO Requirements contain provisions for the management and mitigation of dust emissions to be submitted to the Local Planning Authority (Requirement 30) and also for the implementation of a Code of Construction Practice (Requirement 23). WBC is satisfied with this response.

2.4 Assessment Findings

- 2.4.1 Section 6.7 of Volume 1A of the ES presents the Potential Effects on Air Quality as a result of the Project without consideration of the proposed mitigation and enhancement measures. Section 6.9 of Volume 1A of the ES presents the Residual Effects, i.e. with incorporation of the proposed mitigation and enhancement measures.
- 2.4.2 The findings of the assessment are agreed.
- 2.4.3 Although the findings of the assessment are agreed, WBC requires confirmation as to how some of the assessment findings were calculated. Such confirmation is provided below.

Vehicle Exhaust Emissions

- 2.4.4 WBC notes that predicted changes in nitrogen dioxide (NO₂) and particulate matter less than 10 microns in diameter (PM₁₀) concentrations at sensitive receptors are provided for both the construction (2014) and operational (2024) phases of the Project. However, WBC requires confirmation as to how these concentrations (provided within Tables 6-29, 6-31, 6-39 and 6-41 of Section 6.7 of Volume 1A of the ES), have been derived.
- 2.4.5 Hyder confirms that these tables relate to the vehicle emissions assessment, and that the Design Manual for Roads and Bridges (DMRB) screening model was used to predict NO₂ and PM₁₀ concentrations resulting from vehicle emissions at worst case sensitive receptor locations (refer to paragraph 6.3.35 of Chapter 6: Air Quality of Volume 1A of the ES), in addition to NO_x and N deposition rates at the Morecambe Bay Special Protection Area (SPA) and Ramsar, and Wyre Estuary Site of Special Scientific Interest (SSSI) designated sites. Tables 1-5 to 1-7 within Appendix 6.1 of Volume 1B of the ES present the background concentrations used within the DMRB model. The oxides of nitrogen (NO_x) concentrations were converted to NO₂ using the NO_x to NO₂ calculator presented on the Defra website. WBC is satisfied with this response.

3 DATA NOT ACCEPTED

- 3.1.1 There are no elements of the documents identified within Section 1.1.2 of this SoCG that are not agreed.

STATEMENT OF COMMON GROUND

This Statement of Common Ground on the topic of Air Quality has been prepared by Hyder Consulting (UK) Limited, on behalf of Halite Energy Group Limited, and agreed by Wyre Borough Council.

Signed:

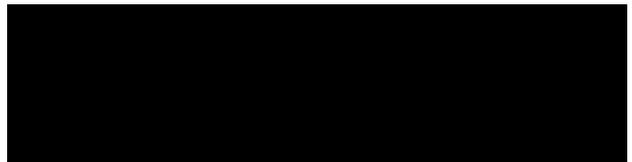


David Hoare

on behalf of Hyder Consulting (UK) Limited

Date: 30 May 2012

Signed:



Councillor David Henderson
Planning Committee Chairman

on behalf of Wyre Borough Council

Date: 29th May 2012