

The Keadby 3 Low Carbon Gas Power Station Project

Document Ref: 6.3

Planning Inspectorate Ref: EN010114

The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order

Land at and in the vicinity of the Keadby Power Station site, Trentside, Keadby, North Lincolnshire

Environmental Statement Volume II - Appendix 8B: Air Quality - Operational Phase

The Planning Act 2008

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Applicant: Keadby Generation Limited

Date: May 2021

DOCUMENT HISTORY

Document Ref	6.3.6/Appendix 8B
Revision	VP1.0
Document Owner	AECOM

GLOSSARY

Abbreviation	Description
ADMS	Atmospheric Dispersion Modelling System
AOD	Above Ordnance Datum
AQAL	Air Quality Assessment Levels
AQMA	Air Quality Management Area
AQMAU	Environment Agency's Air Quality Modelling Assessment Unit
BAT	Best Available Techniques
BAT-AEL	Best Available Techniques
CCGT	Combined Cycle Gas Turbine
DC	Doncaster Council
DMRB	Design Manual for Roads and Bridges
ERYC	East Riding of Yorkshire Council
HRA	Habitats Regulations Assessment
IED	Industrial Emissions Directive
LCP	Large Combustion Plant
LWS	Local Wildlife Site
NLC	North Lincolnshire Council
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

CONTENTS

1.0	Introduction.....	1
1.1	Overview	1
2.0	Scope	2
2.1	Operational traffic emissions	2
2.2	Combustion plant and carbon capture emissions	2
2.3	Combined and Cumulative impacts	3
2.4	Sources of information.....	4
3.0	Methodology	5
3.1	Dispersion model selection.....	5
3.2	Modelled scenarios	5
3.3	Model inputs	6
3.4	Emissions data	7
3.5	Modelled domain – discrete receptors.....	10
3.6	Meteorological data	14
3.7	Building downwash effects	15
3.8	Terrain	16
3.9	NO _x To NO ₂ conversion.....	16
3.10	Calculation of deposition at sensitive ecological receptors.....	17
3.11	Specialised model treatments	17
4.0	Baseline air quality	18
4.1	Overview	18
4.2	Air Quality Management Areas.....	18
4.3	Local authority monitoring data	18
4.4	Defra background data	19
4.5	Ecological site background data	20
4.6	Summary of background air quality	23
5.0	Operational Emissions Modelling Results	24
5.1	Evaluation of stack height.....	24
5.2	Human Health Receptor Results	25
5.3	Ecological Receptor Results.....	28
6.0	Assessment Limitations and Assumptions	47
7.0	Conclusions	48
8.0	References	49

ANNEXES

ANNEX A	Sensitivity Testing of Model Inputs	50
ANNEX B	Assessment of visible plumes from the absorber stack and HYBRID cooling towers	52
ANNEX C	Assessment of Cumulative impacts.....	55

TABLES

Table 1:	General ADMS 5 model inputs	6
----------	-----------------------------------	---

Table 2: Emissions inventory	8
Table 3: Emission concentrations and the assessed emission rates	10
Table 4: Human health receptor locations.....	11
Table 5: Ecological receptor locations.....	12
Table 6: Buildings incorporated into the modelling assessment.....	16
Table 7: Conversion factors – Calculation of Nutrient Nitrogen and Acid Deposition	17
Table 8: Defra background concentrations (NGR 482500,411500) and K2 modified background concentrations	19
Table 9: APIS background data NO _x and NH ₃ (2017 – 2019 data) and K2 modified background concentrations	20
Table 10: APIS Background deposition information	22
Table 11: Predicted change in annual mean NO ₂ concentrations	26
Table 12: Predicted change in hourly mean NO ₂ concentrations (as the 99.79 th Percentile of Hourly Averages).....	27
Table 13: NO _x Dispersion modelling results for ecological receptors	31
Table 14: Dispersion modelling results for ecological receptors – NH ₃	34
Table 15: Dispersion modelling results for ecological receptors – Nutrient nitrogen deposition (Kg N/Ha/Yr)	36
Table 16: Dispersion modelling results for ecological receptors – Acid deposition (Keq/Ha/Yr)	40
Table A1: Point Source Dispersion Model Sensitivity Analysis	50
Table B1: Visible Plumes from the Absorber with a 60°C Release	53
Table B2: Cooling Cell Visible Plume Model Inputs.....	53
Table B3: Cooling Cell Visible Plumes	54

1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This Technical Appendix supports **Chapter 8: Air Quality** (ES Volume I – **Application Document Ref. 6.2**) and describes the additional details for the dispersion modelling of point source emissions from the Proposed Development once operational. This assessment considers the likely significant effects on air quality as a result of the CCGT and the carbon capture plant (CCP). For more details about the Proposed Development, refer to **Chapter 4: The Proposed Development** (ES Volume I – **Application Document Ref. 6.2**).
- 1.1.2 Emissions associated with the operational Proposed Development have the potential to affect human health and sensitive ecosystems, if not appropriately managed. This technical appendix identifies and proposes measures to address the potential impacts and effects of the Proposed Development on air quality during its operational phase.
- 1.1.3 The magnitude of air quality impacts at sensitive human and ecological receptors has been quantified for pollutants emitted from the main stack(s) associated with the Proposed Development. The impact of emissions on sensitive ecological receptors has been considered in the context of relevant critical levels and critical loads for designated and non-designated ecological sites.
- 1.1.4 The assessment has considered emissions from the Proposed Development during normal operational conditions. Non routine emissions, such as those which may occur during the commissioning process or other abnormal short-term events would typically only occur on an infrequent basis, would be detected by the process control system and rectified within a short time period and the plant operation will be tightly regulated by the Environment Agency through the Environmental Permit required for the operation of the Proposed Development. For this reason, no detailed consideration of impacts associated with abnormal or emergency events has been included in this assessment. **Chapter 18: Major Accidents and Disasters** (ES Volume I - **Application Document Ref. 6.2**) includes an assessment of the reasonably foreseeable worst-case environmental consequences potentially arising as a result of the Proposed Development.
- 1.1.5 **Annex A** of this Appendix provides a sensitivity analysis of the model input parameters.
- 1.1.6 **Annex B** of this Appendix provides an assessment of visible plumes from the absorber stack(s), and also from the preferred cooling technology for the Proposed Development.
- 1.1.7 **Annex C** of this Appendix details the cumulative impacts of the Proposed Development and other proposed developments that are considered likely to have cumulative impacts.

2.0 SCOPE

2.1 Operational traffic emissions

2.1.1 No quantitative assessment of traffic emissions during the operational (including maintenance) has been made, as the numbers of additional vehicles associated with the operational phase of the Proposed Development are below the Highways England (HE) Design Manual for Roads and Bridges (DMRB) (HE, 2019) and Institute for Air Quality Management (IAQM) (IAQM, 2017) screening criteria for requiring such assessment. In addition, the predicted impacts for the construction phase traffic emissions show that the effect of additional construction traffic will be not significant at all identified receptors (**Appendix 8A: Air Quality – Construction Phase, ES Volume II – Application Document Ref. 6.3**). The number of additional vehicles for the operational phase, including outages required for maintenance, is well below the numbers assessed for the construction phase and therefore it is considered that the effect of operational traffic is also not significant.

2.2 Combustion plant and carbon capture emissions

2.2.1 The assessment has considered the impact of the operational process emissions on local air quality, under normal operating conditions, with the CCGT operational and the flue gas being abated by the CCP, operating for 8,760 hours per year, as this represents the-worst case for annual average impacts. The assessment considers impacts in the earliest year in which the Proposed Development is due to commence operation, 2026.

2.2.2 The study area for the operational Proposed Development point source emissions extends up to 15km from the Low Carbon Gas Power Station site, in order to assess the potential impacts on ecological receptors, in line with the Environment Agency risk assessment methodology (Defra and Environment Agency, 2016):

- Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites and Sites of Special Scientific Interest (SSSI) within 15km; and
- Local Nature Sites (including ancient woodlands, Local Wildlife Sites (LWS) and National and Local Nature Reserves (NNR and LNR) within 2km.

2.2.3 In terms of human health receptors, impacts from the operational Proposed Development become negligible well within approximately 2km and therefore sensitive receptors for the human health impacts are concentrated within a 2km study area.

2.2.4 The dispersion of emissions from the CCP has been predicted using the latest version of the atmospheric dispersion model ADMS (currently version 5.2.2). The results are presented in both tabular format within this Appendix and as contour plots of predicted ground level process contributions (PC) overlaid on

mapping of the surrounding area (**Figures 8.5 – 8.9** in ES Volume III - **Application Document Ref 6.4**).

- 2.2.5 The dispersion modelling assessment has considered the effects from combustion emissions of oxides of nitrogen (NO_x) and carbon monoxide (CO) associated with the operation of the CCGT plant, with consideration also of the impacts from ammonia (NH₃) slip (from the Selective Catalytic Reduction (SCR) NO_x abatement system). In addition, emissions of amines and their potential degradation products from the CCP have also been assessed.
- 2.2.6 Emissions from Large Combustion Plant (LCP) are currently governed by the Industrial Emissions Directive (IED) Directive 2010/75/EU which contains measures relating to the control of emissions, including setting limits on emissions to air from LCP and requires operators to monitor and report emissions.
- 2.2.7 The Proposed Development would be regulated under the IED and in accordance with the current version of the LCP Best Available Technique (BAT) Reference document (LCP BRef) (European Commission, 2017). The recommendations of the LCP BRef are enforceable through Environmental Permits (H.M. Government, 2016) and the Environment Agency would set specific emission limits in the Environmental Permit issued to the Proposed Development, based on the BAT-associated emission levels (BAT-AEL). There are currently no BAT-AEL relating to the CCP process itself, and the Environment Agency is currently drafting BAT guidance for carbon capture plants. Emissions from the CCP process are therefore based on levels that can be met by plant licensors that need to be achieved to avoid significant adverse effects on receptors.
- 2.2.8 A comparison has been made between predicted model output concentrations (process contributions), and short-term and long-term Air Quality Assessment Levels (AQAL) as detailed in **Chapter 8: Air Quality** (ES Volume I – **Application Document Ref. 6.2**).
- 2.2.9 Sensitivity testing of the model to the various model inputs has been carried out and is reported in **Annex A** of this Appendix.

2.3 Combined and Cumulative impacts

- 2.3.1 Cumulative impacts from existing sources of pollution in the area are accounted for in the adoption of site-specific background pollutant concentrations from archive sources and air quality monitoring in close proximity to the Proposed Development Site.
- 2.3.2 It is recognised, however, that there is a potential impact on local air quality from emission sources which have either received or may receive, planning permission or other consent, but have yet to come into operation. Specifically, the combined impacts with the Keadby 2 Power Station (currently under construction) as well as cumulative effects with other schemes. The impacts of

the Keadby 2 Power Station have been modelled and the resulting process contributions have been used to generate a modified background concentration for use within the assessment.

- 2.3.3 The full list of short-listed cumulative schemes to be considered for the Proposed Development are detailed within **Chapter 19: Cumulative and Combined Effects (ES Volume I - Application Document Ref. 6.2)**. On the basis of available information, the only other development considered to have potential for cumulative operational impacts is the proposed North Lincolnshire Green Energy Park (PINS Ref. EN010116) (refer to **Figure 19.2** in ES Volume III – **Application Document Ref. 6.4**).
- 2.3.4 The Energy Park will include a new Energy Recovery Facility (ERF) with a combined heat and power plant with a potential output capacity of up to 100MWe. As such there will be combustion emissions of NO_x and CO, and also NH₃ from SCR abatement, which could result in cumulative impacts. The Energy Park is also potentially proposed to include carbon capture in the future, and therefore consideration of the potential for cumulative effects in relation to emissions of amines and amine degradation products is also noted. The potential cumulative impacts are assessed considered further in **Annex C** of this Appendix.

2.4 Sources of information

- 2.4.1 The information that has been used within this assessment includes:
- **Chapter 4: Proposed Development (ES Volume I – Application Document Ref. 6.2)**;
 - data on emissions to atmosphere from the process, taken from IED limits, BAT-AEL values and data provided by licensors of the CCP;
 - details on the site layout;
 - Ordnance Survey mapping;
 - baseline air quality data from published sources and Local Authorities;
 - meteorological data supplied by ADM Ltd; and
 - data on committed developments presented in **Chapter 19: Cumulative and Combined Effects (ES Volume I – Application Document Ref. 6.2)**.

3.0 METHODOLOGY

3.1 Dispersion model selection

3.1.1 The assessment of emissions from the Proposed Development has been undertaken using the advanced dispersion model ADMS (version V5.2.2), supplied by Cambridge Environmental Research Consultants Limited (CERC). ADMS is a modern dispersion model that has an extensive published validation history for use in the UK. This model is well validated and has been extensively used throughout the UK for regulatory purposes (CERC, 2020).

3.2 Modelled scenarios

3.2.1 The dispersion modelling undertaken for the assessment of emissions from the operational Proposed Development absorber stack(s) includes:

- emissions from Keadby 2 Power Station have been modelled in isolation and the resulting PCs have been added to existing background concentrations, in order to generate a modified background for use in the assessment;
- modelling of maximum ground-level impacts at a range of release heights for the Proposed Development's main CCP absorber stack (between 100m and 110m AGL), in order to evaluate the effect of increasing the effective release height on dispersion;
- modelling of maximum ground-level impacts at a range of release heights for an alternative licensor's twin stack option¹ for the Proposed Development's main CCP absorber unit (with two stacks up to 74m above ground level (AGL) (76m AoD));
- reporting of impacts at the location of maximum impact for the scenarios assessed, and also at identified human health and sensitive ecological receptors, from the CCP absorber stack at a release height of 105m AGL (107m AOD), as the main reported assessment;
- the location of stack(s) has not been finalised therefore, four assessment scenarios have been modelled, with the absorber stack(s) separately assessed as being located at four corners of a defined area of the Main Site to align with the Work 1C shown in the Works Plan for the CCP (**Application Document Ref. 4.3**), with the worst-case results being reported;
- emissions from the combined cycle gas turbine (CCGT) heat recovery steam generator (HRSG) stack have been considered but are not presented here,

¹ As described in **Chapter 4: The Proposed Development** (ES Volume I – **Application Document Ref. 6.2**), consideration has been given to both a single large absorber and the option of a smaller twin absorber configuration with two stacks up to 74m high in determining worst-case assessments

as initial modelling showed that this will lead to lower impacts than emission from the CCP absorber (detailed in section 3.3); and

- modelling of impacts on a receptor grid and at discrete sensitive human and ecological receptors for all pollutants emitted from the stack.

3.3 Model inputs

3.3.1 The general model conditions used in the assessment are summarised in Table 1. Other data used to model the dispersion of emissions is considered below.

Table 1: General ADMS 5 model inputs

Variable	Input
Surface roughness at source	0.2m
Surface roughness at meteorological site	0.2m
Receptors	Selected discrete receptors (as Tables 4 and Table 5)
	Regular spaced grid
Receptor location	X, Y co-ordinates determined by GIS
	z (ground level) = 1.5 m for residential receptors
	z = 0 m for ecological receptors
Source location	X, Y co-ordinates determined by GIS Modelled in the four corners of the CCP Work 1C area (Application Document Ref. 4.3) to enable flexibility in design, with the worst-case results reported.
Emissions	IED emission limits, BAT-AEL values and data provided by amine solvent licensors
Sources	1 x CCP Absorber Stack for the Proposed Development 1 x CCGT Stack for Keadby 2 Power Station
Meteorological data	5 years of meteorological data, Doncaster Robinhood Airport Meteorological Station (2015 - 2019)
Terrain data	Not required
Buildings that may cause building downwash effects	Keadby 2 Power Station Gas turbine hall, HRSG building and Steam turbine hall. Proposed Development CCP absorber tower.

3.4 Emissions data

- 3.4.1 During normal operation, the CCP absorber stack(s) would be the primary source of emissions from both the combustion and carbon capture processes associated with the Proposed Development. Emissions from the adjacent Keadby 2 Power Station CCGT stack have also been considered in the assessment, and the resulting impacts have been used to generate a modified background concentration.
- 3.4.2 In addition, there would be an additional stack associated with Proposed Development's CCGT unit, which would only be operational when the Proposed Development is operating in an unabated mode (i.e. combustion emissions only, with no carbon capture taking place) as described in **Chapter 4: The Proposed Development (ES Volume I – Application Document Ref. 6.2)**.
- 3.4.3 The combustion emissions (NO_x and CO, including NH_3 from the SCR) associated with these two modes of operation would be subject to the same emission limits when directed through the absorber stack as through the HRSG stack, and therefore the associated release rates would be comparable. The unabated emissions from the CCGT plant only, however, would be released at a higher temperature (approximately 75°C compared with temperatures up to 60°C for the CCP) and therefore have improved thermal buoyancy, and consequentially dispersion, resulting in a level of impact that is no worse than for the carbon capture mode of operation. Initial modelling showed that emissions from the HRSG stack will lead to lower impacts than emissions from the CCP absorber; therefore, these results have not been presented.
- 3.4.4 When the plant is operating with carbon capture, there are additional emissions of amines and potentially their degradation compounds (nitrosamines and nitramines, collectively referred to as N-amines). The carbon capture mode of operation therefore has been assessed as representing the worst-case mode of operation in terms of the resulting predicted impacts, due to the additional species emitted and the lower release temperature, resulting in reduced thermal buoyancy of the release. The assessment of amine degradation products is presented in Technical **Appendix 8C: Air Quality Assessment of Amine Degradation Products (ES Volume II – Application Document Ref. 6.3)**.
- 3.4.5 The main reported emissions for the Proposed Development have therefore been modelled based on the single larger CCP absorber stack. This stack has been evaluated for a range of stack heights but based on the predicted results, a stack height of 105m AGL (107.6m AOD) with an internal stack diameter of 6.8m. It is considered that 105m AGL is the appropriate stack height that would result in not significant impacts at human health receptors and would limit significant effects reported at ecological receptors, with the current conservative model input parameters and therefore has been used in the assessment. The physical properties of the assessed emission sources are shown in Table 2 and are illustrated in **Figure 8.4 (ES Volume III – Application Document Ref. 6.4)**. These are based on the worst-case emission data provided by CCGT

equipment suppliers and CCP licensors, in order to ensure that a conservative assessment has been carried out.

Table 2: Emissions inventory

Parameter	Unit	Keadby 2 Power Station HRSG stack	Proposed Development CCP absorber stack
Stack position	(NGR) m	482670, 411606	482104, 412084 ¹ 481820, 412158 481799, 411884 482213, 411884
Stack release height (AGL)	m	75	105
Effective internal stack diameter	m	8	6.8
Flue temperature	°C	74.1	60.0
Flue H ₂ O content	%	10.2	7.4
Flue O ₂ content (dry)	%	11.4	11.1
Stack gas exit velocity	m/s	20.5	24.3
Stack flow (actual)	Am ³ /s	1,030	856.4
Stack flow at reference conditions (STP, dry, 15% O ₂)	Nm ³ /s	1,162	1,080
¹ In line with the Rochdale Envelope approach, the layout is subject to change and therefore the modelling carried out has considered a range of stack locations within the Main Site (Proposed PCC Site), with the worst-case results being reported.			

3.4.6 The modelled pollutant emission rates (in grams per second (g/s)) have been calculated by multiplying the emission concentration by the volumetric flow rate at normalised reference conditions. The emission limits assumed to apply to the Proposed Development are shown in Table 3.

3.4.7 In order to optimise the rate of carbon capture, emission concentrations of NO_x are required to be no higher than the BAT-AEL range provided in the Large Combustion Plant BRef (10 - 30 mg/Nm³ as a yearly average and 15 - 40 mg/Nm³ as a daily average). Whilst it is recognised that some additional NO_x may be formed in the CCP itself, there would also be control of NO_x through the proposed SCR unit and removal of further NO_x from the CCP through reaction with amine.

- 3.4.8 NO_x has therefore been modelled at the upper end of the yearly BAT-AEL range for annual average impacts and at the upper end of the daily BAT-AEL range for hourly average impacts. It is considered that this represents the worst-case NO_x emissions; in practice the emission is likely to be lower than these concentrations, as it is desirable to reduce the NO_x emissions entering the inlet of the CCP.
- 3.4.9 A NO_x abatement system such as SCR may be required to achieve the required NO_x emission on inlet to the CCP. SCR reduces NO_x concentrations by spraying urea (or other forms of NH₃) into the flue gas and therefore has the potential to result in 'ammonia slip' with a resulting emission of NH₃. Emissions of NH₃ have therefore also been included in the assessment.
- 3.4.10 In addition, depending on the amine solution used, ammonia can result as a degradation product during the carbon capture process itself. As there is uncertainty in the level of potential ammonia emission, the design for the CCP may include provision for an acid wash to remove ammonia from the absorber stack gas, if required. Emissions of NH₃ have therefore been assessed at a concentration considered to be achievable through the use of acid wash abatement (1 mg/Nm³).
- 3.4.11 Depending on the final CCGT and solvent selection, acid wash may not be required to control ammonia emissions from the CCP. Alternatively, other design parameters may be applied to ensure that the impacts associated with any ammonia emission are acceptable at ecological receptors (such as additional reheat, or a taller stack, although the stack height would remain within the parameters assessed under the Rochdale Envelope, presented in Table 4.1 in **Chapter 4: The Proposed Development (ES Volume I – Application Document Ref. 6.2)**).
- 3.4.12 The carbon capture process is likely to utilise a proprietary amine solvent to remove the carbon dioxide from the combustion emission. Emissions of 'amine slip' can therefore also result.
- 3.4.13 There are a number of licensors with proprietary amine solutions available for use in carbon capture systems, however at this stage of the development the final licensor has not been selected. Each licensor's proprietary amine solution is likely to contain a different amine or mix of amines and therefore in order to consider this in the assessment, the potential amine release has been assessed at the maximum concentration provided by all the potential licensors and has been assessed as monoethanolamine (MEA), since this is the only amine species that has a published EAL.
- 3.4.14 It is also known that amines degrade into nitrosamines and nitramines (collectively referred to as N-amines) both within the carbon capture process itself and also in the environment following release, and therefore this has also been considered in the assessment. Depending on the amine solvent, other degradation products, such as acetaldehyde, formaldehyde and ketones may

be formed, and therefore these have also been included at the maximum value obtained from all the licensors under consideration.

3.4.15 Due to the complexity of the N-amines atmospheric degradation processes that occur following release, the assessment of N-amines is described in Technical **Appendix 8C: Air Quality Assessment of Amine Degradation Products** (ES Volume II – **Application Document Ref. 6.3**).

3.4.16 The assessment has assumed that the Proposed Development would operate at continuous design load (8,760 hours per year). No time-based variation in emissions has therefore been accounted for within the model. The Keadby 2 Power Station has also been assumed to be operational for 8,760 hours per year for the purpose of generating the modified background concentrations.

Table 3: Emission concentrations and the assessed emission rates

Pollutant	Keadby 2 Power Station		Proposed Development CCP absorber stack	
	Emission concentration (mg/Nm ³)	Emission rate (g/s)	Emission concentration (mg/Nm ³)	Emission rate (g/s)
Oxides of Nitrogen (NO _x (as NO ₂))	34	39.5	30	32.4
Carbon Monoxide (CO)	100	116.2	100	108.0
Ammonia (NH ₃)	3.8	4.4	1.0	1.1
Amines	-	-	5.5	5.9
Acetaldehyde	-	-	5.3	5.7
Formaldehyde	-	-	0.5	0.5
Ketones	-	-	5.0	5.4

3.5 Modelled domain – discrete receptors

Sensitive human receptors

3.5.1 The modelling has predicted concentrations of the pollutants relevant to human health at the maximum location anywhere and at discrete air quality sensitive receptors, as listed in Table 4. The locations of these receptors are also shown in **Figure 8.1** (ES Volume III – **Application Document Ref. 6.4**). The receptors are selected to be representative of residential dwellings and recreational areas in the area around the Proposed Development. (OR = Operational Receptor).

For human health receptors, concentrations have been predicted at a height of 1.5m.

Table 4: Human health receptor locations

Receptor I.D.	Receptor description	Grid reference		Distance and direction from the operational Main Site
		X	Y	
OR1	Holly House	483036	411882	810m north-east
OR2	1 Trent Side, Keadby	483368	411284	1.3km south-east
OR3	North Pilfrey Farm	480853	411403	990m south-west
OR4	Keadby Grange	481565	410909	990m south
OR5	Pharon-Ville - Gunness	484057	411661	1.8km east
OR6	Boskeydyke Farm, Amcotts	483860	413348	2.0km north-east
OR7	Grange Cottage, Gunness	484708	412315	2.5km north-east
OR8	Pilfrey Farm	480769	409994	2.1km south-west
OR9	Thorne Village	469571	412678	12.2km west
OR10	Vazon Bridge House ¹	482507	411501	475m south
OR11	North Moor Farm	482875	412621	790m north-west

¹ Taken to also be representative of Roe Farm and the Scunthorpe Sea Cadets receptors.

Sensitive ecological receptors

3.5.2 In accordance with the Environment Agency’s air emissions risk assessment guidance (Defra and Environment Agency, 2016), the impacts associated with emissions from the Proposed Development on statutory sensitive ecological sites has been quantified. The assessment considers European designated sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) and Sites of Special Scientific Interest (SSSI) within 15km of the operational Proposed Development, as recommended by the Environment Agency’s risk assessment guidance for “large emitters”. The most notable of these sites is the Humber Estuary Ramsar, SPA and SSSI, which is adjacent to the Water Connection Corridor of the Proposed Development Site but over 1.3km from the Main Site.

- 3.5.3 In addition, LWS within 2km of the Proposed Development have also been included in the assessment.
- 3.5.4 Ground-level concentrations of the modelled pollutants relevant to sensitive ecological receptors have been predicted at locations listed in Table 5. The locations of these receptors are also shown in **Figure 8.2** (ES Volume III – **Application Document Ref. 6.4**). The location reported for each ecology site is the point closest to the Proposed Development, taken to be representative of the worst-case.

Table 5: Ecological receptor locations

I.D.	Receptor description	Designation	Grid reference		Distance and direction from the operational Main Site
			X	Y	
OE1	Humber Estuary	Ramsar, SAC, SSSI	483573	411823	1.3km east
OE2	Humber Estuary	Ramsar, SAC, SSSI	483612	412068	1.4km east
OE3	Humber Estuary	Ramsar, SAC, SSSI	483723	412323	1.5km east
OE4	Humber Estuary	Ramsar, SAC, SSSI	483817	412556	1.6km east
OE5	Humber Estuary	Ramsar, SAC, SSSI	483951	412817	1.8km east
OE6	Crowle Borrow Pits	SSSI	479102	410825	2.9km west
OE7	Hatfield Chase Ditches	SSSI	478769	410293	3.4km south-west
OE8	Eastoft Meadow	SSSI	478772	414311	3.7km north-west
OE9	Belshaw	SSSI	476961	406079	7.7km south-west
OE10	Thorne Moor	SAC, SPA and SSSI	475934	414720	6.3km north-west
OE11	Epworth Turbary	SSSI	475690	404195	9.8km south-west
OE12	Risby Warren	SSSI	491180	413564	9.1km east
OE13	Hatfield Moor	SAC, SPA and SSSI	471828	408178	10.4km west

I.D.	Receptor description	Designation	Grid reference		Distance and direction from the operational Main Site
			X	Y	
OE14	Messingham Heath	SSSI	487748	403574	9.9km south-east
OE15	Tuetoes Hills	SSSI	484361	401698	10.4km south
OE16	Haxey Turbary	SSSI	475107	401866	11.9km south-west
OE17	Rush Furlong	SSSI	478141	400564	11.9km south
OE18	Hewson's Field	SSSI	478493	399614	12.7km south
OE19	Messingham Sand Quarry	SSSI	491394	404065	12.0km south-east
OE20	Manton and Twigmoor	SSSI	492895	405918	12.2km south-east
OE21	Scotton and Laughton Forest Ponds	SSSI	485863	399966	12.4km south
OE22	Broughton Far Wood	SSSI	495776	410821	13.6km east
OE23	Broughton Alder Wood	SSSI	495914	409994	13.9km east
OE24	Scotton Beck Field	SSSI	487885	399177	13.9km south-east
OE25	Scotton Common	SSSI	486951	398641	14.1km south
OE26	Laughton Common	SSSI	483534	397224	14.7km south
OE27	Stainforth and Keadby Canal Corridor	LWS	482055	411529	330m south
OE28	Keadby Wetland	LWS	482773	411433	695m east
OE29	Keadby Wet Grassland	LWS	482785	411409	710m east
OE30	Three Rivers	LWS	482956	411068	1.1km south-east
OE31	Ash Tip	N/A	481797	412068	Adjacent to west

I.D.	Receptor description	Designation	Grid reference		Distance and direction from the operational Main Site
			X	Y	
OE32	Humber Estuary (at Blacktoft Sands)	Ramsar, SAC, SPA and SSSI	486210	421275	10.3km north-east

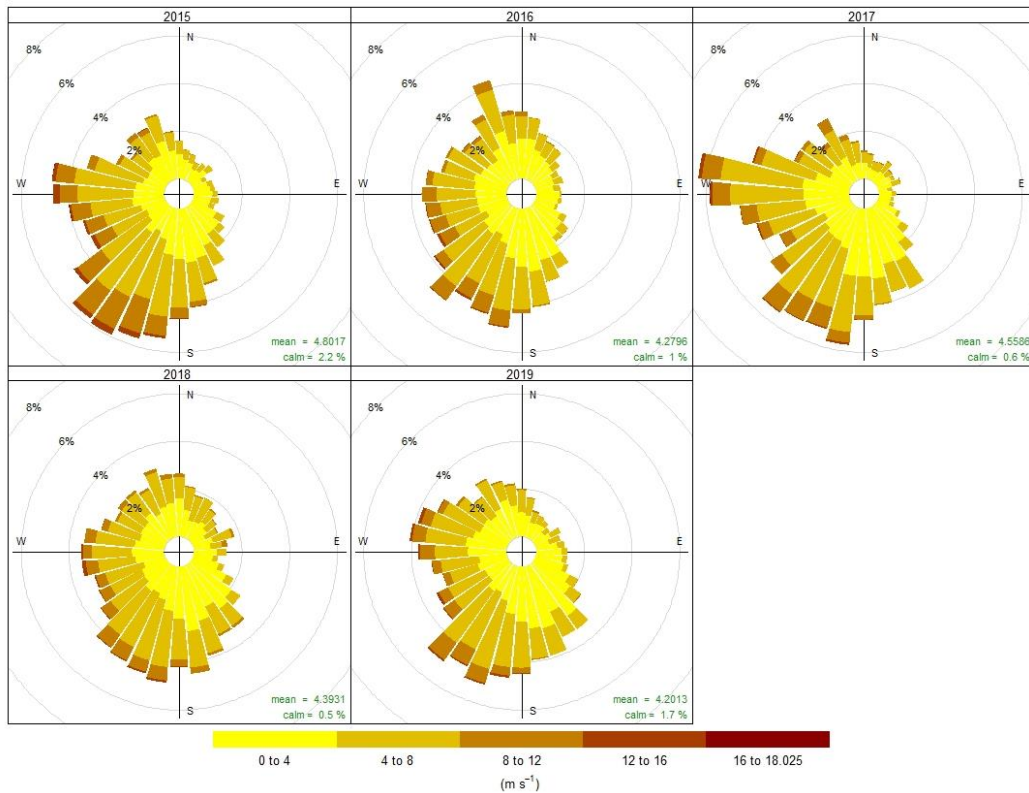
Modelled domain – receptor grid

- 3.5.5 Emissions from the Proposed Development absorber stack has been modelled on a receptor grid that is 4km by 4km centred on the area containing the CCP. The grid spacing is 44m, which is considered appropriate for a 105m stack.
- 3.5.6 In addition, the receptors detailed in Tables 4 and 5 have been included as specified points within the model and therefore are unaffected by grid spacing.
- 3.5.7 In order to produce isopleths for ecological receptors, a larger grid with variable grid spacing has been used, this included an inner grid extending 500m at a resolution of 25m x 25m. A middle grid extending from 500m to 5,000m at a resolution of 50m x 50m. An outer grid extending from 5,000m to 15,000m at a resolution of 250m x 250m.

3.6 Meteorological data

- 3.6.1 Actual measured hourly-sequential meteorological data is available for input into dispersion models, and it is important to select data as representative as possible for the site that will be modelled. This is usually achieved by selecting a meteorological station as close to the site as possible, although other stations may be used if the local terrain and conditions vary considerably, or if the station does not provide sufficient data.
- 3.6.2 The meteorological site that was selected for the assessment is Doncaster Robin Hood Airport, located approximately 21km south-west of the Proposed Development Site, at a flat airfield in a principally agricultural area. A surface roughness of 0.2m (representative of an agricultural area) has been selected for the meteorological site within the model.
- 3.6.3 The modelling for this assessment has utilised 5 years of meteorological data for the period 2015 – 2019. Wind roses for each of the years within this period are shown in **Plate 1**.

Plate 1: Wind roses for Doncaster Robin Hood Airport, 2015 to 2019



3.7 Building downwash effects

- 3.7.1 The buildings that make up the Proposed Development have the potential to affect the dispersion of emissions from the operational process stack. The ADMS buildings effect module has therefore been used to incorporate building downwash effects as part of the model set up. Buildings greater than one-third of the range of the stack height modelled have been included within the modelling assessment.
- 3.7.2 Buildings associated with the Proposed Development that have been considered to be of sufficient height and volume to potentially impact on the dispersion of emission stacks are shown in Table 6. Model sensitivity testing showed that the only building to affect the predicted impacts from the CCP absorber stack, was the absorber building itself. A plan showing the buildings layout used in the ADMS simulation is illustrated in **Figure 8.4: Air Quality, Operational study area, Modelled Buildings (ES Volume III – Application Document Ref. 6.4)**.
- 3.7.3 The absorber building has been included in the model in all four corners of the CCP Works 1C area (**Application Document Ref. 4.3**), as described above for the stack location. The modelled locations are shown in Table 6 and a plan showing the building layout used in the ADMS simulation is illustrated in **Figure 8.4 (ES Volume III – Application Document Ref. 6.4)**. The dimensions of the absorber are the maximum measurements that could potentially be required (as

defined in the Rochdale Envelope) and have been provided by the Design Engineers. Keadby 2 buildings have been included within the model with the parameters that were assessed at Planning/ Permitting stage for that Development.

Table 6: Buildings incorporated into the modelling assessment

Building	Building centre grid reference (x, y)		Height (m)	Length (m)	Width (m)	Angle (°)
Keadby 2 Power Station HRSG	482676	411630	40	26.15	46.17	104
Keadby 2 Power Station GT	482699	411676	30	47.3	19.9	104
Keadby 2 Power Station Building	482630	411659	30	45.8	45.7	104
Proposed Development Absorber	481204	412084	90 ¹	13	40	0
	481820	412158				
	481799	411884				
	428213	411884				

¹ The full height of the absorber tower is 99m, however the top 16m of the tower is formed from a sloping transition piece that tapers the footprint of the absorber building to the stack bottom, and as such the absorber height in the model has been reduced by half of the height of the transition piece to take account of the fact that this will reduce the downwash effects of the absorber building on the emission.

3.8 Terrain

- 3.8.1 The local area immediate to the Proposed Development is flat agricultural land, with the urban area of Scunthorpe (including the industrial area on the east side) approximately 4.1km to the east. The Proposed Development is situated near to the River Trent and River Humber. A surface roughness of 0.2m, corresponding to the minimum value associated with the terrain type, has therefore been selected to represent the local terrain.
- 3.8.2 Site-specific terrain data has not been used in the model, as there are no potentially significant changes in gradient within the study area.

3.9 NO_x To NO₂ conversion

- 3.9.1 Emissions of NO_x from industrial point sources are typically dominated by nitric oxide (NO), with emissions from combustion sources typically in the ratio of nitric oxide to nitrogen dioxide of 9:1. However, it is nitrogen dioxide that has specified environmental standards due to its potential impact on human health. In the ambient air, nitric oxide is oxidised to nitrogen dioxide by the ozone present, and the rate of oxidation is dependent on the relative concentrations of nitric oxide and ozone in the ambient air.

3.9.2 For the purposes of detailed modelling, and in accordance with Environment Agency technical guidance it is assumed that 70% of nitric oxide emitted from the stack is oxidised to nitrogen dioxide in the long term and 35% of the emitted nitric oxide is oxidised to nitrogen dioxide in the local vicinity of the Proposed Development Site in the short-term.

3.10 Calculation of deposition at sensitive ecological receptors

3.10.1 The deposition of nutrient nitrogen and acid at sensitive ecological receptors has been calculated using the modelled process contributions (PC) predicted at the receptor points. The deposition rates are determined using conversion rates and factors contained within published guidance (Highways England, 2019) (IAQM, 2020), which takes into account variations in the deposition mechanisms for different types of habitat.

3.10.2 The conversion rates and factors used in the assessment are shown in Table 7.

Table 7: Conversion factors – Calculation of Nutrient Nitrogen and Acid Deposition

Pollutant	Deposition velocity grassland (m/s)	Deposition velocity woodland (m/s)	Deposition Conversion factors	
			Nutrient Nitrogen ($\mu\text{g}/\text{m}^3/\text{s}$ to $\text{kg}/\text{ha}/\text{yr}$)	Acid ($\mu\text{g}/\text{m}^3/\text{s}$ to $\text{keq}/\text{ha}/\text{yr}$)
NO _x as NO ₂	0.0015	0.003	96	6.84
NH ₃	0.02	0.03	259.7	18.5

3.11 Specialised model treatments

3.11.1 Emissions have been modelled such that they are not subject to dry and wet deposition or depleted through chemical reactions. The assumption of continuity of mass is likely to result in an over-estimation of impacts at receptors, and therefore is considered to be conservative.

4.0 BASELINE AIR QUALITY

4.1 Overview

4.1.1 This section presents the information used to evaluate the background and baseline ambient air quality in the area surrounding the Proposed Development. The following steps have been taken in the determination of background values:

- identification of Air Quality Management Areas (AQMA);
- review of North Lincolnshire Council (NLC) ambient monitoring data;
- review of data from Defra's background mapping database;
- review of background data and site relevant critical loads from the APIS website;
- modelling of the Keadby 2 power station emissions and adding the resulting PCs to the existing background concentrations, in order to provide a modified baseline for the assessment.

4.2 Air Quality Management Areas

4.2.1 NLC has declared a single AQMA within their administrative area (6.2km east of the Proposed Development Site), for the exceedance of the 24-hour mean PM₁₀ AQAL (50µg/m³ not to be exceeded more than 35 times within a year). As the AQMA has not been declared for the pollutant species emitted from the operational Proposed Development, it would not be impacted by the emissions from it.

4.2.2 The study area includes small parts of the administrative areas of Doncaster Council (DC) and East Riding of Yorkshire Council (ERYC). DC has declared AQMA for NO₂ within their administrative area, but none are within the study area for residential receptors; the closest being over 10km from the Proposed Development Site. As the AQMA are upwind of the operational Proposed Development, and based on the isopleth modelling results, it would not be impacted by the emissions from it.

4.3 Local authority monitoring data

4.3.1 NLC undertook automatic monitoring for NO₂ at 3 sites within their administrative area in 2018 and undertook diffusion tube monitoring at 22 locations.

4.3.2 The nearest automatic monitors are located approximately 7.5km from the Proposed Development Site; CM1 (Scunthorpe Town AURN) and CM3 (Low Santon). The annual mean for NO₂ for 2018 at CM1 monitor was 18µg/m³ and at CM3 it was 20µg/m³.

4.3.3 The nearest NO₂ diffusion tube monitoring locations to the Proposed Development are approximately 4.5km to the east, located on Doncaster Road

(DT3 and DT4) and Scotter Road (DT2, near junction with Doncaster Road). Doncaster Road is a major road from the A18 and M181 into the centre of Scunthorpe. Annual mean concentrations of NO₂ at these locations range between 19 - 24µg/m³, well below the annual AQAL of 40µg/m³.

- 4.3.4 Given that these monitoring locations are closer to, or within, more populated/urbanised areas than the area surrounding the Proposed Development site, it is considered that the background concentrations of NO₂ would be higher than those in the immediate vicinity of the Proposed Development.

4.4 Defra background data

- 4.4.1 Defra's 2018-based background maps are available at a 1x1 km resolution for the UK for 2018 and are projected forward to the year 2030. These projections of pollution concentrations across England are available for NO₂ and NO_x.
- 4.4.2 Background concentrations from the Defra 2018-based background maps are presented for the year 2018 in Table 8, and have been taken for the grid square in which the operational Proposed Development is located (482500,411500) for NO_x and NO₂.
- 4.4.3 Background concentrations for CO are not available for the most recent Defra maps, but data for 2001-based background concentrations are available and this has been adjusted for 2018 using the Defra published year adjustment factors.
- 4.4.4 Data for 2018 has been presented for the assessment to represent a conservative approach, as the typical trend shown in the Defra background mapping is that over the projected time period, concentrations of NO₂ and NO_x are shown to be decreasing. This corresponds to a reduction over time of vehicle emissions as newer, cleaner vehicles replace older ones. Therefore, assuming no reduction occurs until the opening year of the Proposed Development (2026), is considered to represent a conservative approach, and is in line with advice from the Environment Agency on similar projects.
- 4.4.5 A review of the background map concentrations over the study area for human health receptors shows that the concentrations presented in Table 8 for the Proposed Development Site location are also representative of the background concentrations at the receptor locations (the average NO₂ concentration in the grid squares with identified receptors was 9.1µg/m³). The additional contribution from the Keadby 2 power station is also shown, together with the modified background concentration for use in the assessment

Table 8: Defra background concentrations (NGR 482500,411500) and K2 modified background concentrations

Pollutant	Defra Background concentration (µg/m ³)	Keadby 2 Process Contribution (µg/m ³)	K2 Modified Background concentration (µg/m ³)
NO _x	12.5	0.75	13.3
NO ₂	9.5	0.52	10.0
CO	111.8	161.8	273.6

4.4.6 There is no background monitoring data for the other trace species emitted from the Proposed Development (amines, N-amines). N-amine levels are likely to be below the limit of detection of any monitoring technique currently available for these species.

4.5 Ecological site background data

4.5.1 The NO_x and NH₃ background concentrations for designated SAC, SPA and SSSI sites are available from the APIS website. The average concentrations present at the relevant habitat receptor sites are presented in Table 9, together with the modelled PCs from the Keadby 2 power station (shown in parenthesis), and the modified background concentrations.

Table 9: APIS background data NO_x and NH₃ (2017 – 2019 data) and K2 modified background concentrations

Receptor I.D.	Ecology site	APIS Backgrounds		K2 Modified Background concentration (µg/m ³)	
		NO _x (µg/m ³)	NH ₃ (µg/m ³)	NO _x (µg/m ³)	NH ₃ (µg/m ³)
OE1-5	Humber Estuary	13.0	2.3	(0.7) 13.7	(0.08) 2.4
OE6	Crowle Borrow Pits	13.2	2.6	(0.1) 13.3	(0.01) 2.6
OE7	Hatfield Chase Ditches	13.2	2.6	(0.1) 13.3	(0.01) 2.6
OE8	Eastoft Meadow	11.0	2.6	(0.1) 11.1	(0.01) 2.6
OE9	Belshaw	10.8	2.6	(0.1) 10.9	(0.01) 2.6
OE10	Thorne Moor	11.2	2.6	(0.0) 11.2	(0.01) 2.6
OE11	Epworth Turbary	10.6	2.2	(0.0) 10.6	(0.00) 2.2
OE12	Risby Warren	14.7	3.2	(0.1) 14.8	(0.01) 3.2
OE13	Hatfield Moor	11.7	2.4	(0.0) 11.7	(0.00) 2.4

Receptor I.D.	Ecology site	APIS Backgrounds		K2 Modified Background concentration ($\mu\text{g}/\text{m}^3$)	
		NO_x ($\mu\text{g}/\text{m}^3$)	NH_3 ($\mu\text{g}/\text{m}^3$)	NO_x ($\mu\text{g}/\text{m}^3$)	NH_3 ($\mu\text{g}/\text{m}^3$)
OE14	Messingham Heath	11.0	3.3	(0.1) 11.1	(0.01) 3.3
OE15	Tuetoes Hills	10.3	2.4	(0.1) 10.4	(0.01) 2.4
OE16	Haxey Turbary	10.6	2.2	(0.0) 10.6	(0.00) 2.2
OE17	Rush Furlong	10.3	2.2	(0.0) 10.4	(0.01) 2.2
OE18	Hewsons Field	10.5	2.2	(0.0) 10.5	(0.01) 2.2
OE19	Messingham Sand Quarry	12.3	2.8	(0.1) 12.3	(0.01) 2.8
OE20	Manton and Twigmoor	12.0	2.7	(0.1) 12.1	(0.01) 2.7
OE21	Scotton and Laughton Forest Ponds	10.5	2.6	(0.1) 10.6	(0.01) 2.6
OE22	Broughton Far Wood	13.4	3.0	(0.1) 13.5	(0.01) 3.0
OE23	Broughton Alder Wood	13.5	4.2	(0.1) 13.6	(0.01) 4.2
OE24	Scotton Beck Field	11.0	2.6	(0.1) 11.0	(0.01) 2.6
OE25	Scotton Common	11.0	2.6	(0.1) 11.0	(0.01) 2.6
OE26	Laughton Common	10.2	2.0	(0.1) 10.3	(0.01) 2.0
OE27	Stainforth and Keadby Canal Corridor	13.5	2.3	(0.0) 13.5	(0.00) 2.3
OE28	Keadby Wetland	13.5	2.3	(0.0) 13.5	(0.00) 2.3
OE29	Keadby Wet Grassland	13.5	2.3	(0.0) 13.5	(0.00) 2.3
OE30	Three Rivers	13.0	2.3	(0.2) 13.3	(0.03) 2.3
OE31	Ash Tip	13.0	2.3	(0.1) 13.2	(0.01) 2.3
OE32	Humber Estuary (at Blacktoft Sands)	12.9	1.9	(0.2) 13.1	(0.02) 1.9

4.5.2 In addition, the APIS website provides information on the relevant critical loads for the assessment of depositional impacts, as well as background nitrogen deposition and acid deposition loads. The background data is presented in Table 10, and the relevant critical load classes and ranges are shown in the results Tables 16 and 17. Table 10 also shows the modelled PCs from the Keadby 2 power station (shown in parenthesis), and the modified background concentrations (N.B. only the Nitrogen acid deposition baseline has been modified as there are no emissions of sulphur species).

Table 10: APIS Background deposition information

Receptor I.D.	APIS Backgrounds			K2 Modified Background concentration ($\mu\text{g}/\text{m}^3$)	
	N-Deposition (kg N/Ha/Yr)	Acid Deposition		N-Deposition (kg N/Ha/Yr)	Acid Deposition (Keq N/Ha/Yr)
		(Keq N/Ha/Yr)	(Keq S/Ha/Yr)		
OE1-5	19.7	1.4	0.2	(0.48) 20.2	(0.03) 1.4
OE6	36.5	2.6	0.3	(0.06) 36.6	(0.03) 2.6
OE7	21.3	1.5	0.2	(0.06) 21.3	(0.00) 1.5
OE8	21.3	1.5	0.2	(0.05) 21.3	(0.00) 1.5
OE9	21.6	1.5	0.2	(0.03) 21.6	(0.00) 1.5
OE10	21.3	1.5	0.2	(0.03) 21.3	(0.00) 1.5
OE11	18.9	1.4	0.2	(0.03) 18.9	(0.00) 1.4
OE12	26.0	1.9	0.4	(0.09) 26.1	(0.00) 1.9
OE13	20.9	1.5	0.2	(0.03) 20.9	(0.00) 1.5
OE14	24.5	1.8	0.2	(0.06) 24.6	(0.00) 1.8
OE15	19.7	1.4	0.2	(0.06) 19.8	(0.00) 1.4
OE16	18.9	1.4	0.2	(0.03) 18.9	(0.00) 1.4
OE17	18.9	1.4	0.2	(0.03) 18.9	(0.00) 1.4
OE18	18.5	1.3	0.2	(0.03) 18.5	(0.00) 1.3
OE19	38.4	2.7	0.3	(0.05) 38.4	(0.00) 2.7
OE20	22.7	1.6	0.3	(0.06) 22.7	(0.00) 1.6
OE21	21.1	1.5	0.2	(0.06) 21.2	(0.00) 1.5
OE22	41.9	3.0	0.3	(0.08) 41.9	(0.00) 3.0
OE23	51.7	3.7	0.3	(0.08) 51.7	(0.00) 3.7
OE24	21.1	1.5	0.2	(0.06) 21.2	(0.00) 1.5
OE25	21.1	1.5	0.2	(0.06) 21.2	(0.00) 1.5
OE26	17.6	1.3	0.2	(0.04) 17.7	(0.00) 1.3

Receptor I.D.	APIS Backgrounds			K2 Modified Background concentration ($\mu\text{g}/\text{m}^3$)	
	N-Deposition (kg N/Ha/Yr)	Acid Deposition		N-Deposition (kg N/Ha/Yr)	Acid Deposition (Keq N/Ha/Yr)
		(Keq N/Ha/Yr)	(Keq S/Ha/Yr)		
OE27	19.7	1.4	0.2	(0.00) 19.7	(0.03) 1.4
OE28	33.7	2.4	0.3	(0.02) 33.8	(0.03) 2.4
OE29	19.7	1.4	0.2	(0.01) 19.7	(0.03) 1.4
OE30	19.7	1.4	0.2	(0.17) 19.9	(0.03) 1.4
OE31	19.7	1.4	0.2	(0.07) 19.8	(0.03) 1.4
OE32	18.1	1.3	0.2	(0.11) 18.7	(0.03) 1.3

4.6 Summary of background air quality

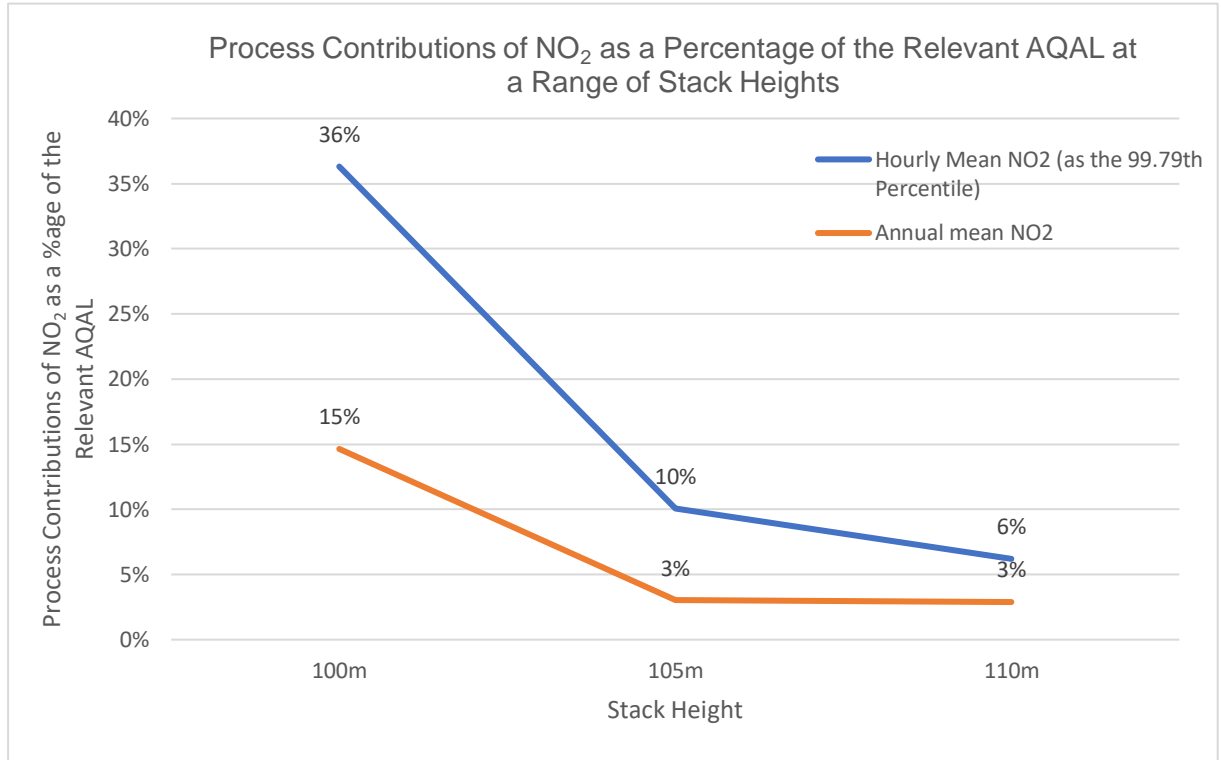
- 4.6.1 For human health receptors, the background concentrations for NO_2 , and CO have been taken from the Defra background mapping and modified with the contribution from the Keadby 2 power station, as presented in Table 8: Defra background concentrations (NGR 482500,411500).
- 4.6.2 The background NO_x and NH_3 concentrations for ecological receptors were sourced from APIS using the specific location for the relevant ecological receptors and modified with the contribution from the Keadby 2 power station, as detailed in Tables 9 and 10.
- 4.6.3 Where no short-term concentrations are available, short-term background concentrations have been calculated by multiplying the selected annual mean background concentration by a factor of two, in accordance with the Environment Agency Risk Assessment methodology.
- 4.6.4 In order to represent a conservative approach, it has been assumed that background concentrations of NO_2 would not decrease in future years. Therefore, the current background concentrations have been assumed to apply to the projected opening year of 2026.

5.0 OPERATIONAL EMISSIONS MODELLING RESULTS

5.1 Evaluation of stack height

- 5.1.1 The selection of an appropriate stack release height requires a number of factors to be taken into account, the most important of which is the need to balance a release height sufficient to achieve adequate dispersion of pollutants against other constraints such as the visual impact of tall stacks.
- 5.1.2 The emissions from the CCP occur from a stack on top of the absorber building. The absorber building itself has been included in the model at a height of 91m AGL. The top 16m of the absorber building consists of a sloped transition piece that tapers the footprint of the absorber building to the stack bottom, and as such the absorber height in the model has been reduced by half of the height of the transition piece to take account of the fact that this tapering will reduce the downwash effects of the absorber building on the emission.
- 5.1.3 Given the already tall height of the absorber building, the stack has been modelled at heights between 100m and 110m, at 5m increments. A graph showing the percentage PC against the relevant AQAL for the annual mean and maximum 1-hour NO₂ concentrations is presented in **Plate 2**. The purpose of the graph is to evaluate the optimum release height in terms of the dispersion of pollutants which would occur, against the visual constraints of further increases in release height, with the 'elbow' of the resulting curve showing where the reductions in ground level concentrations become disproportionate to the increasing height, regarded as the stack height that represents BAT for the emission source.
- 5.1.4 Analysis of the curves shows that the benefit of the incremental increase in release heights between 100m and 105m are relatively pronounced. At heights above 105m, the air quality benefit of increasing release height further is reduced, especially for annual average impacts. The reported results are therefore based on a 105m stack.

Plate 2: Stack Height Determination



5.2 Human Health Receptor Results

Nitrogen dioxide emissions

- 5.2.1 The predicted change in annual mean NO₂ concentrations at the identified human health receptors occurring during the operation of the Proposed Development, are presented in Table 11. The results shown represent the highest (worst-case) result from all five years of the meteorological data used in the model.
- 5.2.2 The maximum predicted annual mean NO₂ concentration that occurs anywhere within the study area as a result of the Proposed Development is 0.8µg/m³, which represents 2% of the annual mean AQAL. This occurs just to the north of the operational Proposed Development. The annual mean NO₂ predicted environmental concentration (PEC) (i.e. the PC + the existing background concentration) is 10.9µg/m³ and therefore is well below the annual mean NO₂ AQAL of 40µg/m³. NO₂ emissions from the Proposed Development are therefore not predicted to lead to a risk of the annual mean AQAL being exceeded anywhere within the study area.
- 5.2.3 The discrete receptor most affected by emissions from the Proposed Development is receptor OR11 Northmoor Farm, with a predicted annual mean NO₂ concentration of 0.7µg/m³, also representing 1.8% of the AQAL.

5.2.4 The significance of the predicted change in annual mean NO₂ concentrations is discussed in **Chapter 8: Air Quality** (ES Volume I – **Application Document Ref. 6.2**).

Table 11: Predicted change in annual mean NO₂ concentrations

Receptor	AQAL (µg/m ³)	PC (µg/m ³)	PC/AQAL %	Modified Background Concentration (BC) (µg/m ³)	PEC (µg/m ³)	PEC/AQAL %
Max anywhere	40	0.8	2.0%	10.0	10.9	27%
OR1		0.3	0.8%	9.8	10.1	25%
OR2		0.2	0.6%	9.8	10.0	25%
OR3		0.1	0.3%	9.8	9.9	25%
OR4		0.1	0.3%	9.1	9.3	23%
OR5		0.3	0.8%	9.9	10.3	26%
OR6		0.4	0.9%	8.9	9.3	23%
OR7		0.2	0.6%	9.9	10.1	25%
OR8		0.1	0.3%	9.4	9.5	24%
OR9		0.02	0.0%	11.9	11.9	30%
OR10		0.2	0.4%	10.0	10.2	26%
OR11		0.7	1.8%	9.1	9.8	25%

PC = Process Contribution, AQAL = Air Quality Assessment Level, BC = Background Concentration, PEC = Predicted Environmental Concentration

5.2.5 The maximum predicted hourly mean NO₂ concentration (as the 99.79th percentile of hourly averages) that occurs anywhere within the study area as a result of the Proposed Development is 24.6µg/m³, and this occurs again just to the north of the operational Proposed Development. The PEC (i.e. the PC + the existing background concentration) is 43.6µg/m³ and is therefore well below the hourly mean NO₂ AQAL of 200µg/m³. NO₂ emissions from the Proposed Development are therefore not predicted to lead to a risk of the hourly mean air quality standard being exceeded anywhere within the study area.

5.2.6 The discrete receptor most affected by the short-term emissions from the Proposed Development is receptor OR11 North Moor Farm, with a predicted hourly mean NO₂ concentration as a result of the Proposed Development of 9.2µg/m³, representing 5% of the AQAL.

Table 12: Predicted change in hourly mean NO₂ concentrations (as the 99.79th Percentile of Hourly Averages)

Receptor	AQAL (µg/m ³)	PC (µg/m ³)	PC/AQAL %	Modified BC (µg/m ³)	PEC (µg/m ³)	PEC/AQAL %
Max anywhere	200	24.6	12%	20.0	43.6	22%
OR1		7.1	4%	19.6	26.7	13%
OR2		6.5	3%	19.6	26.1	13%
OR3		5.6	3%	19.5	25.1	13%
OR4		6.6	3%	18.3	24.8	12%
OR5		5.0	2%	19.9	24.8	12%
OR6		4.8	2%	17.9	22.6	11%
OR7		3.7	2%	19.7	23.5	12%
OR8		4.6	2%	18.9	23.4	12%
OR9		1.1	1%	23.7	24.9	12%
OR10		8.2	4%	20.1	28.2	14%
OR11		9.2	5%	18.2	27.4	14%

PC = Process Contribution, AQAL = Air Quality Assessment Level, BC = Background Concentration, PEC = Predicted Environmental Concentration

Carbon monoxide emissions

5.2.7 The maximum hourly and 8-hour running mean PC that occur anywhere as a result of the Proposed Development represent less than 2% of the relevant AQAL and therefore can be considered to be insignificant/ negligible at all receptor locations, being less than 10% of both the AQAL. In addition, when added to the background concentrations in the study area, the PEC remains less than 7% of the relevant AQAL for both averaging periods. The results at individual receptors have therefore not been presented.

Ammonia emissions

5.2.8 The annual and hourly average PC of ammonia that occur anywhere as a result of the Proposed Development represent less than 1% of the relevant AQAL and therefore can be considered to be insignificant/ negligible at all receptor locations. In addition, when added to the background concentrations in the study area, the PEC remains less than 1% of the relevant AQAL for both averaging periods. The results at individual receptors have therefore not been presented.

Amine emissions

- 5.2.9 The annual average PC of amines that occurs anywhere as a result of the Proposed Development represent less than 1% of the relevant AQAL for MEA at all locations and therefore can be considered to be insignificant/ negligible. The results at individual receptors have therefore not been presented.
- 5.2.10 The hourly average concentration at the maximum impacted location represents 6% of the AQAL for MEA, and therefore can also be considered to be insignificant/ negligible. The results at individual receptors have therefore not been presented.

Other potential degradation products emissions

- 5.2.11 The annual average PCs of other degradation products (formaldehyde, acetaldehyde and ketones) that occurs anywhere as a result of the Proposed Development represents less than 1% of the relevant AQAL at all locations and therefore can be considered to be insignificant/ negligible. The results at individual receptors have therefore not been presented.
- 5.2.12 The hourly average concentrations of these species at the maximum impacted location represent less than 10% of the relevant AQAL, and therefore can also be considered to be insignificant/ negligible. The results at individual receptors have therefore not been presented.

5.3 Ecological Receptor Results

- 5.3.1 The results of the dispersion modelling of predicted impacts on sensitive ecological receptors are presented in Table 14 to Table 16. The tables set out the predicted PC compared to the atmospheric concentrations of NO_x and NH₃ and also nutrient nitrogen and acid deposition.
- 5.3.2 Specific significance criteria relating to impacts on sensitive designated ecological receptors are set out within the Environment Agency air emissions risk assessment guidance. The impact of stack emissions can be regarded as insignificant at sites with statutory designations if:
- the long-term PC is less than 1% of the critical level, or if greater than 1% then the PEC is less than 70% of the critical level; and
 - the short-term PC is less than 10% of the critical level.
- 5.3.3 The impact of stack emissions can be regarded as insignificant at sites of local importance if:
- the long-term PC is less than 100% of the critical level; and
 - the short-term PC is less than 100% of the critical level.
- 5.3.4 The effect of atmospheric NO_x concentrations, nitrogen deposition rates and acid deposition rates on the modelled receptor locations is considered in detail

in the report to inform the Habitats Regulations Assessment Screening Report (HRA) (**Application Document Ref 5.12**). Further discussion on the significance of the impact on sensitive ecological receptors is provided in **Chapter 11: Biodiversity and Nature Conservation** (ES Volume I – **Application Document Ref. 6.2**).

Oxides of nitrogen emissions – Critical Levels

- 5.3.5 The assessment results show that the predicted annual average and daily average NO_x impacts are below the criteria for insignificance at the majority of the ecological receptors assessed.
- 5.3.6 PCs of more than 1% of the annual average critical level for NO_x occur at the adjacent Humber Estuary SAC and SSSI and Ramsar, Keadby Wetland LWS, Keadby Wet grassland and Three Rivers LWS, however in combination with the background concentrations, all sites are less than 70% of the critical level threshold for insignificance, therefore no exceedances of the annual critical level are predicted.
- 5.3.7 The daily critical level is below the 10% screening threshold for insignificance at all the statutory designated sites except for the Humber Estuary. In combination with the background concentration at the Humber Estuary, the impacts are 41% of the daily critical level and therefore indicate that no exceedance of the daily critical level is predicted.
- 5.3.8 Four of the LWS have impacts over the 10% daily critical level, however again with the background concentrations taken into account, the impacts are well below the daily critical level at all these sites, and therefore no exceedance of the daily critical level is predicted at any non-statutory nature conservation site.
- 5.3.9 Due to the worst-case assumptions used in the assessment, it is considered that the predicted impacts are conservative and that an exceedance of the critical level is unlikely to occur as a result of the emissions from the operational Proposed Development.

Ammonia – Critical Levels

- 5.3.10 The assessment results show that the predicted annual average NH₃ impacts at all the ecological receptors are below the criteria for insignificance (<1% of the critical level) and therefore can be considered insignificant
- 5.3.11 Further interpretation of the significance of these results, is provided in the main **Chapter 8: Air Quality** and in **Chapter 11: Biodiversity and Nature Conservation** (ES Volume I – **Application Document Ref. 6.2**).

Nitrogen deposition – Critical Loads

- 5.3.12 The Environment Agency and Natural England have agreed that depositional impacts that are below 1% of the relevant critical load for a site can be regarded

as insignificant. Guidance from the IAQM clarifies that the 1% threshold is not intended to be precise to a set number of decimal places but to the nearest whole number (paragraph 5.5.2.6 of Institute of Air Quality Management, 2020²).

- 5.3.13 The majority of sites have impacts that can be screened as being insignificant as they are less than 1% of the critical load, or where this is not the case, the PC together with the background concentration do not exceed the critical load.
- 5.3.14 Further interpretation of the significance of these results is provided in **Chapter 11: Biodiversity and Nature Conservation** (ES Volume I – **Application Document Ref. 6.2**).

² Institute of Air Quality Management (2020). *A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites, Version 1.1* [Online]. Available from: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

Table 13: NO_x Dispersion modelling results for ecological receptors

Receptor ID	Site Name	Annual average (µg/m ³)						24-hour average (µg/m ³)					
		CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL	CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL
OE1-5	Humber Estuary Ramsar/ SAC/ SSSI	30	0.49	1.6%	13.7	14.23	47%	75	9.9	13%	20.6	30.5	41%
OE6	Crowle Borrow Pits SSSI		0.10	0.3%	13.3	13.36	45%		5.7	8%	19.9	25.6	34%
OE7	Hatfield Chase Ditches SSSI		0.08	0.3%	13.3	13.34	44%		4.5	6%	19.9	24.3	32%
OE8	Eastoft Meadow SSSI		0.08	0.3%	11.0	11.11	37%		2.9	4%	16.6	19.4	26%
OE9	Belshaw SSSI		0.05	0.2%	10.9	10.92	36%		1.3	2%	16.3	17.6	24%
OE10	Thorne Moor SAC		0.05	0.2%	11.2	11.25	38%		1.7	2%	16.8	18.6	25%
OE11	Epworth Turbary SSSI		0.04	0.1%	10.7	10.72	36%		1.0	1%	16.0	17.1	23%
OE12	Risby Warren SSSI		0.10	0.3%	14.8	14.91	50%		1.1	2%	22.2	23.4	31%
OE13	Hatfield Moor SAC		0.03	0.1%	11.7	11.78	39%		1.4	2%	17.6	19.1	25%
OE14	Messingham Heath SSSI		0.06	0.2%	11.1	11.11	37%		1.7	2%	16.6	18.2	24%
OE15	Tuetoes Hills SSSI		0.08	0.3%	10.4	10.46	35%		2.3	3%	15.6	17.9	24%
OE16	Haxey Turbary SSSI		0.03	0.1%	10.6	10.62	35%		0.9	1%	15.9	16.8	22%
OE17	Rush Furlong SSSI		0.04	0.1%	10.4	10.41	35%		1.3	2%	15.6	16.8	22%
OE18	Hewsons Field SSSI		0.04	0.1%	10.5	10.57	35%		1.0	1%	15.8	16.8	22%

Receptor ID	Site Name	Annual average ($\mu\text{g}/\text{m}^3$)						24-hour average ($\mu\text{g}/\text{m}^3$)					
		CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL	CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL
OE19	Messingham Sand Quarry SSSI		0.05	0.2%	12.3	12.38	41%		1.0	1%	18.5	19.5	26%
OE20	Manton and Twigmoor SSSI		0.06	0.2%	12.1	12.11	40%		1.8	2%	18.1	19.8	26%
OE21	Scotton and Laughton Forest Ponds SSSI		0.07	0.2%	10.6	10.64	35%		2.7	4%	15.9	18.5	25%
OE22	Broughton Far Wood SSSI		0.09	0.3%	13.5	13.60	45%		0.9	1%	20.3	21.2	28%
OE23	Broughton Alder Wood SSSI		0.09	0.3%	13.6	13.67	46%		0.9	1%	20.4	21.3	28%
OE24	Scotton Beck Fields SSSI		0.06	0.2%	11.0	11.10	37%		1.2	2%	16.6	17.7	24%
OE25	Scotton Common SSSI		0.07	0.2%	11.0	11.09	37%		2.3	3%	16.5	18.8	25%
OE26	Laughton Common SSSI		0.05	0.2%	10.3	10.34	34%		1.1	1%	15.4	16.5	22%
OE27	Stainforth and Keadby Canal Corridor LWS		0.27	0.9%	13.5	13.76	46%		13.1	17%	20.2	33.3	44%
OE28	Keadby Wetland LWS		0.37	1.2%	13.5	13.90	46%		12.8	17%	20.3	33.1	44%
OE29	Keadby Wet Grassland LWS		0.32	1.1%	13.5	13.82	46%		12.2	16%	20.2	32.4	43%
OE30	Three Rivers LWS		0.25	0.8%	13.3	13.53	45%		10.3	14%	19.9	30.2	40%

Receptor ID	Site Name	Annual average ($\mu\text{g}/\text{m}^3$)						24-hour average ($\mu\text{g}/\text{m}^3$)					
		CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL	CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL
OE31	Ash tip		0.02	0.1%	13.2	13.20	44%		1.7	2%	19.8	21.5	29%
OE32	Humber Estuary (at Blacktoft Sands) Ramsar, SAC, SPA and SSSI		0.13	0.4%	13.1	13.19	44%		1.4	2%	19.6	21.0	28%

CL = Critical Level, PC = Process Contribution, BC = Background Concentration, PEC = Predicted Environmental Concentration

Table 14: Dispersion modelling results for ecological receptors – NH₃

Receptor ID	Site Name	Annual Average (µg/m ³)					
		CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL
OE1-5	Humber Estuary SSSI, SAC, Ramsar	3	0.02	0.5%	2.36	2.38	79%
OE6	Crowle Borrow Pits SSSI	3	0.003	0.1%	2.60	2.60	87%
OE7	Hatfield Chase Ditches SSSI	No features listed					
OE8	Eastoft Meadow SSSI	3	0.003	0.1%	2.60	2.60	87%
OE9	Belshaw SSSI	3	0.002	0.1%	2.64	2.64	88%
OE10	Thorne Moor SAC	1	0.002	0.2%	2.60	2.60	260%
OE11	Epworth Turbary SSSI	1	0.001	0.1%	2.19	2.20	220%
OE12	Risby Warren SSSI	1	0.003	0.3%	3.23	3.24	324%
OE13	Hatfield Moor SAC	1	0.001	0.1%	2.39	2.40	240%
OE14	Messingham Heath SSSI	1	0.002	0.2%	3.27	3.27	327%
OE15	Tuetoes Hills SSSI	1	0.003	0.3%	2.41	2.41	241%
OE16	Haxey Turbary SSSI	1	0.001	0.1%	2.19	2.20	220%
OE17	Rush Furlong SSSI	3	0.001	0.0%	2.20	2.20	73%
OE18	Hewsons Field SSSI	3	0.001	0.0%	2.24	2.24	75%
OE19	Messingham Sand Quarry SSSI	1	0.002	0.2%	2.78	2.78	278%
OE20	Manton and Twigmoor SSSI	1	0.002	0.2%	2.69	2.69	269%
OE21	Scotton and Laughton Forest Ponds SSSI	1	0.002	0.2%	2.58	2.58	258%

Receptor ID	Site Name	Annual Average (µg/m ³)					
		CL	PC	PC % of CL	Modified BC	PEC	PEC % of CL
OE22	Broughton Far Wood SSSI	3	0.003	0.1%	3.02	3.03	101%
OE23	Broughton Alder Wood SSSI	3	0.003	0.1%	4.17	4.18	139%
OE24	Scotton Beck Fields SSSI	1	0.002	0.2%	2.58	2.58	258%
OE25	Scotton Common SSSI	1	0.002	0.2%	2.58	2.58	258%
OE26	Laughton Common SSSI	1	0.002	0.2%	1.97	1.97	197%
OE27	Stainforth and Keadby Canal Corridor LWS	3	0.009	0.3%	2.28	2.29	76%
OE28	Keadby Wetland LWS	3	0.012	0.4%	2.28	2.30	77%
OE29	Keadby Wet Grassland LWS	3	0.012	0.4%	2.28	2.29	76%
OE30	Three Rivers LWS	3	0.008	0.3%	2.31	2.32	77%
OE31	Ash tip	1	0.001	0.1%	2.29	2.29	229%
OE32	Humber Estuary (at Blacktoft Sands) Ramsar, SPA, SAC and SSSI	3	0.004	0.1%	1.89	1.91	64%

CL = Critical Level, PC = Process Contribution, BC = Background Concentration, PEC = Predicted Environmental Concentration

Table 15: Dispersion modelling results for ecological receptors – Nutrient nitrogen deposition (Kg N/Ha/Yr)

Receptor ID	Site name	Modified Background nitrogen deposition (kg N/ha/yr)	Most stringent Critical Load class applicable for the site	Lower value of applicable Critical Load range	PC (kg N/ha/yr)	PC % Critical Load	PEC (kg N/ha/yr)	PEC % Critical Load
OE1-5	Humber Estuary Ramsar, SSSI, SAC	20.2	Pioneer, Low-mid, mid-upper saltmarshes	20	0.13	0.7%	20.4	102%
OE6	Crowle Borrow Pits SSSI	36.6	Broad-leaved, mixed and yew woodland	10	0.05	0.5%	36.6	366%
OE7	Hatfield Chase Ditches SSSI	No features listed in APIS						
OE8	Eastoft Meadow SSSI	21.3	Neutral grassland	20	0.02	0.1%	21.4	107%
OE9	Belshaw SSSI	No critical loads assigned for the features present						
OE10	Thorne Moor SAC	21.3	Degraded Raised Bogs	5	0.01	0.2%	21.3	426%
OE11	Epworth Turbary SSSI	18.9	Raised and blanket bogs	5	0.01	0.2%	18.9	379%
OE12	Risby Warren SSSI	26.1	Acid Grassland	8	0.03	0.3%	26.2	327%
OE13	Hatfield Moor SSSI	20.9	Raised and blanket bogs	5	0.01	0.2%	20.9	418%

Receptor ID	Site name	Modified Background nitrogen deposition (kg N/ha/yr)	Most stringent Critical Load class applicable for the site	Lower value of applicable Critical Load range	PC (kg N/ha/yr)	PC % Critical Load	PEC (kg N/ha/yr)	PEC % Critical Load
OE14	Messingham Heath SSSI	24.6	Acid Grassland	8	0.02	0.2%	24.6	307%
OE15	Tuetoes Hills SSSI	19.8	Acid Grassland	8	0.02	0.3%	19.8	248%
OE16	Haxey Turbary SSSI	18.9	Raised and blanket bogs	5	0.01	0.2%	18.9	379%
OE17	Rush Furlong SSSI	18.9	Neutral Grassland	20	0.01	0.1%	18.9	95%
OE18	Hewsons Field SSSI	18.5	Neutral Grassland	20	0.01	0.1%	18.5	93%
OE19	Messingham Sand Quarry SSSI	38.4	Broadleaved deciduous woodland	10	0.02	0.2%	38.4	384%
OE20	Manton and Twigmoor SSSI	22.7	Acid Grassland	8	0.02	0.2%	22.8	284%
OE21	Scotton and Laughton Forest Ponds SSSI	21.2	Fen, Marsh and Swamp (assumed)	10	0.02	0.2%	21.2	212%
OE22	Broughton Far Wood SSSI	41.9	Broad-leaved, mixed and yew woodland	15	0.04	0.3%	42.0	280%
OE23	Broughton Alder Wood SSSI	Broad-leaved, mixed and yew woodland – Not sensitive to nitrogen deposition						

Receptor ID	Site name	Modified Background nitrogen deposition (kg N/ha/yr)	Most stringent Critical Load class applicable for the site	Lower value of applicable Critical Load range	PC (kg N/ha/yr)	PC % Critical Load	PEC (kg N/ha/yr)	PEC % Critical Load
OE24	Scotton Beck Fields SSSI	21.2	Acid Grassland	10	0.02	0.2%	21.2	212%
OE25	Scotton Common SSSI	21.2	Dwarf Shrub Heath	10	0.02	0.2%	21.2	212%
OE26	Laughton Common SSSI	17.7	Acid grasslands	8	0.01	0.2%	17.7	221%
OE27	Stainforth and Keadby Canal Corridor LWS	19.7	Neutral grassland	20	0.07	0.4%	19.8	99%
OE28	Keadby Wetland LWS	33.8	Broadleaved deciduous woodland	10	0.17	1.7%	33.9	339%
OE29	Keadby Wet Grassland LWS	19.7	Coastal and floodplain grazing marsh	20	0.09	0.4%	19.8	99%
OE30	Three Rivers LWS	19.9	Coastal and floodplain grazing marsh	20	0.07	0.3%	20.0	100%
OE31	Ash tip	19.8	Acid grassland	10	0.01	0.1%	19.8	198%
OE32	Humber Estuary at Blacktoft Sands	18.2	Rich Fens	15	0.04	0.2%	18.2	121%

Receptor ID	Site name	Modified Background nitrogen deposition (kg N/ha/yr)	Most stringent Critical Load class applicable for the site	Lower value of applicable Critical Load range	PC (kg N/ha/yr)	PC % Critical Load	PEC (kg N/ha/yr)	PEC % Critical Load
	(Ramsar, SAC, SPA and SSSI)							

Table 16: Dispersion modelling results for ecological receptors – Acid deposition (Keq/Ha/Yr)

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
OE1-5	Humber Estuary Ramsar/ SAC/ SSSI	Fen, marsh and swamp – not sensitive to acidity						
OE6	Crowle Borrow Pits SSSI	Min CL Min N: 0.142 Min CL Max N: 2.694 Min CL Max S: 2.337	N: 2.6 S: 0.25	Unmanaged Broadleaved/ Coniferous Woodland	107%	0.003	0.0%	107%
OE7	Hatfield Chase Ditches SSSI	No features listed in APIS						
OE8	Eastoft Meadow SSSI	Min CL Min N: 0.438 Min CL Max N: 2.008 Min CL Max S: 1.57	N: 1.5 S: 0.2	Acid grassland	86%	0.002	0.0%	86%
OE9	Belshaw SSSI	No critical loads assigned for the features present						

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
OE10	Thorne Moor SAC	Min CL Min N: 0.321 Min CL Max N: 0.462 Min CL Max S: 0.141	N: 1.5 S: 0.2	Bogs	374%	0.001	0.0%	374%
OE11	Epworth Turbary SSSI	Min CL Min N: 0.321 Min CL Max N: 0.478 Min CL Max S: 0.157	N: 1.4 S: 0.2	Bogs	362%	0.001	0.0%	362%
OE12	Risby Warren SSSI	Min CL Min N: 0.223 Min CL Max N: 0.858 Min CL Max S: 0.42	N: 1.9 S: 0.4	Acid grassland	262%	0.002	0.0%	262%
OE13	Hatfield Moor SAC	Min CL Min N: 0.321	N: 1.5 S: 0.2	Bogs	356%	0.001	0.0%	356%

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
		Min CL Max N: 0.475 Min CL Max S: 0.154						
OE14	Messingham Heath SSSI	Min CL Min N: 0.366 Min CL Max N: 0.556 Min CL Max S: 0.19	N: 1.8 S: 0.2	Acid grassland	356%	0.001	0.0%	356%
OE15	Tuetoos Hills SSSI	Min CL Min N: 0.366 Min CL Max N: 0.556 Min CL Max S: 0.20	N: 1.4 S: 0.2	Acid grassland	288%	0.001	0.0%	288%
OE16	Haxey Turbary SSSI	Min CL Min N: 0.321 Min CL Max N: 0.477	N: 1.4 S: 0.2	Bogs	323%	0.001	0.0%	323%

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
		Min CL Max S: 0.156						
OE17	Rush Furlong SSSI	Min CL Min N: 0.295 Min CL Max N: 2.028 Min CL Max S: 1.59	N: 1.4 S: 0.2	Acid grassland	76%	0.001	0.0%	76%
OE18	Hewsons Field SSSI	Min CL Min N: 0.438 Min CL Max N: 2.048 Min CL Max S: 1.61	N: 1.3 S: 0.2	Acid grassland	74%	0.001	0.0%	74%
OE19	Messingham Sand Quarry SSSI	Min CL Min N: 0.142 Min CL Max N: 1.214 Min CL Max S: 1.016	N: 2.7 S: 0.3	Unmanaged Broadleaved/Coniferous Woodland	247%	0.002	0.0%	247%

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
OE20	Manton and Twigmoor SSSI	Min CL Min N: 0.223 Min CL Max N: 0.556 Min CL Max S: 0.19	N: 1.6 S: 0.3	Acid grassland	338%	0.001	0.0%	338%
OE21	Scotton and Laughton Forest Ponds SSSI	Min CL Min N: 0.321 Min CL Max N: 0.484 Min CL Max S: 0.163	N: 1.5 S: 0.2	Bogs	355%	0.001	0.0%	355%
OE22	Broughton Far Wood SSSI	Min CL Min N: 0.285 Min CL Max N: 0.989 Min CL Max S: 0.704	N: 3.0 S: 0.3	Unmanaged Broadleaved/Coniferous Woodland	337%	0.003	0.0%	337%
OE23	Broughton Alder Wood SSSI	Broad-leaved, mixed and yew woodland – Not sensitive to acidity						

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
OE24	Scotton Beck Fields SSSI	Min CL Min N: 0.366 Min CL Max N: 0.556 Min CL Max S: 0.19	N: 1.5 S: 0.2	Acid grassland	311%	0.001	0.0%	311%
OE25	Scotton Common SSSI	Min CL Min N: 1.035 Min CL Max N: 1.225 Min CL Max S: 0.19	N: 1.5 S: 0.2	Dwarf shrub heath	141%	0.001	0.0%	141%
OE26	Laughton Common SSSI	Min CL Min N: 0.223 Min CL Max N: 0.576 Min CL Max S: 0.21	N: 1.3 S: 0.2	Acid grassland	254%	0.001	0.0%	254%
OE27	Stainforth and Keadby Canal Corridor LWS	No information available						

Receptor ID	Site name	Acid deposition				PC acid deposition (keq/ha/yr)		
		Critical Load (keq/ha/yr)	Modified Baseline (keq/ha/yr)	Lowest Critical Load class applicable	Modified Baseline % of Critical Load	PC	PC % of Critical Load	PEC% of Critical Load
OE28	Keadby Wetland LWS	No information available						
OE29	Keadby Wet Grassland LWS	No information available						
OE30	Three Rivers LWS	No information available						
OE31	Ash tip	No information available						
OE32	Humber Estuary at Blacktoft Sands (Ramsar, SAC, SPA and SSSI)	Fen, Marsh and Swamp - Not sensitive to acidity						

6.0 ASSESSMENT LIMITATIONS AND ASSUMPTIONS

6.1.1 This section outlines the potential limitations associated with the dispersion modelling assessment. Where assumptions have been made, this is also detailed here.

6.1.2 The greatest uncertainty associated with any dispersion modelling assessment arises through the inherent uncertainty of the dispersion modelling process itself. Nevertheless, the use of dispersion modelling is a widely applied and accepted approach for the prediction of impacts from industrial sources.

6.1.3 In order to minimise the likelihood of under-estimating the PC to ground level concentrations from the absorber stack, the following conservative assumptions have been made within the assessment:

- the operational Proposed Development has been assumed to operate on a continuous basis i.e. for 8,760 hour per year, although in practice the plant would require routine maintenance periods;
- the modelling predictions are based on the use of five full years of meteorological data from Doncaster Robin Hood meteorological station for the years 2015 to 2019 inclusive, with the highest result being reported for all years assessed;
- the largest possible building sizes within the Rochdale Envelope have been included in the assessment; therefore, the stack height represents the highest required to achieve the impacts presented in this assessment;
- the stack has been located in all four corners of the CCP Work area (1C) (**Application Document Ref. 4.3**), and the worst-case receptor results reported; and,
- emission concentrations for the process are calculated based on the use of IED limits, BAT-AEL concentrations, or licensor maximum envisaged emission rates from licensors; in practice annual average rates would be below this to enable continued compliance with Environmental Permit requirements (H.M. Government, 2016).

6.1.4 The following assumptions have been made in the preparation of the assessment:

- 70% NO_x to NO₂ conversion rate has been assumed in predicting the long-term PC, and 35% for the short-term PC respectively;
- ammonia emissions have been assessed based on a concentration of 1mg/Nm³, which may need an acid wash abatement step after the water wash to enable this to be achieved; and separately, and
- heating has been considered for the absorber stack gases to improve dispersion and reduce plume visibility; an assessment of visible plumes is included in **Annex B**.

7.0 CONCLUSIONS

- 7.1.1 This report has assessed the impact on local air quality of the operation of the Proposed Development. The assessment has used the dispersion model ADMS to predict the increases in pollutant species released from the operational Proposed Development to the local study area.
- 7.1.2 An evaluation of the release height for the main stack has shown that a release height of 105m above ground level is capable of mitigating the short-term and long-term impacts of emissions to an acceptable level, with regard to existing air quality and ambient air quality standards at human health receptors. This is based on the assumption that the absorber tower is at a height of up to 99m. Should the height of the tower be reduced, the stack height could also be lowered, as the down wash effects would be reduced, enabling a lower stack to have the same level of predicted impact as presented in this assessment.
- 7.1.3 Emissions from the absorber stack would result in small increases in ground-level concentrations of the modelled pollutants. Taking into account available information on background concentrations within the modelled domain, predicted operational concentrations of the modelled pollutants would be within current environmental standards for the protection of human health.
- 7.1.4 The modelling of impacts at designated ecological sites (SAC/ Ramsar / SPA and SSSI) has predicted that emissions would give rise to no significant effects with regard to increases in atmospheric concentrations of NO_x.
- 7.1.5 Impacts of NH₃ are not significant at all designated ecological sites.
- 7.1.6 Depositional impacts of nutrient nitrogen and acid are considered to be not significant. Further interpretation and discussion of these impacts and effects is provided in **Chapter 11: Biodiversity and Nature Conservation (ES Volume I – Application Document Ref. 6.2)** and the HRA Screening Report (**Application Document Ref. 5.12**).

8.0 REFERENCES

Cambridge Environmental Research Consultants (CERC) (2020). *Model Validation* (online) [Accessed 02/06/2020]. Available online: <https://www.cerc.co.uk/environmental-software/model-validation.html>

Department for Environment, Food & Rural Affairs and Environment Agency (2016). *Air emissions risk assessment for your environmental permit* (online). [Accessed 04/09/2020]. Available from: <https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits>

ERM (2019). Keadby Power Station – Environmental Permit Variation Application Air Quality Impact Assessment and Habitat Regulations Assessment. Available from [Annex C Air Quality Impact Assessment and Habitat Regulations Assessment.pdf \(environment-agency.gov.uk\)](#)

European Commission (2010). *Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control (Recast))*.

European Commission (E.C.) (2017) *Best available techniques Reference document for Large Combustion Plants* (online). [Accessed 04/09/2020]. Available from: https://eippcb.jrc.ec.europa.eu/sites/default/files/2019-11/JRC_107769_LCPBref_2017.pdf

H.M. Government (2016) The Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No. 1154), the Stationary Office. Available online: <https://www.legislation.gov.uk/uksi/2016/1154/contents/made>

Highways England (2019) *Design Manual for Roads and Bridges (DMRB), Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 1, LA 105 Air Quality*. Available online: <https://www.standardsforhighways.co.uk/dmrbr/search/10191621-07df-44a3-892e-c1d5c7a28d90>

Institute of Air Quality Management (2020) *A guide to the assessment of air quality impacts on designated nature conservation sites, v1.1*, May 2020. Available online: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

ANNEX A SENSITIVITY TESTING OF MODEL INPUTS

A.1.1 The maximum predicted concentrations of NO₂ at the worst-affected human health receptors and NO_x at the worst-affected statutory designated ecological receptor associated with the variable input parameters, are presented in Table A1 as the percentage of maximum reported values in Tables 11, 12 and 13 above.

Table A1: Point Source Dispersion Model Sensitivity Analysis

Model Input Variable	Human Health Receptor		Ecological Receptor	
	Short-term	Long-term	Short-term	Long-term
Meteorological data (5-year min-max)	74%	59%	55%	63%
Stack and absorber position	82%	72%	82%	95%
Surface roughness representation (0.3m)	87%	154%	106%	104%
Surface roughness representation (0.1m)	92%	89%	90%	94%

A.1.2 The main uncertainty associated with the model is considered to be the meteorological data, with a NO₂ process contribution variation of 74% in the hourly mean NO₂ results; this is equivalent to an overall uncertainty at the worst-affected receptor of -3.6 µg/m³ (or -2% of the relevant AQAL).

A.1.3 The annual average NO₂ process contribution varies by 59%, equivalent to an overall uncertainty at the worst-affected receptor of -0.5 µg/m³ (or -1% of the relevant AQAL).

A.1.4 The position of the absorber and stack has a less marked effect on the predicted process contributions than the meteorological data.

A.1.5 The surface roughness representation in the main model has been assessed at 0.2m, representative of the lowest surface roughness associated with agricultural land. This is consistent with modelling carried out for the Keadby 2 Power Station Section 36 Consent and Environmental Permit application, and therefore is considered to be the most appropriate surface roughness to represent the Proposed Development Site. The surface roughness has been varied and it was found that a higher surface roughness (0.3m), on the whole resulted in higher impacts at the worst case receptor, however for receptors

further away from the source, the impacts would be reduced over those reported in the main assessment.

A.1.6 The lower surface roughness of 0.1m resulted in lower impacts.

ANNEX B ASSESSMENT OF VISIBLE PLUMES FROM THE ABSORBER STACK AND HYBRID COOLING TOWERS

- B.1.1 Due to the initial water content of the emission from the absorber stack, and the relatively low temperature of the release, there is potential for the plume released from the stack to be visible. The ADMS module can assess the potential for visible plumes to form, based on the initial water content of the release, and the humidity of the ambient air.
- B.1.2 The plume from a stack is described by the model developers as being “visible” when liquid water is present in the plume above a critical threshold of 0.002kg/kg.
- B.1.3 The original version of the Environment Agency H1 Risk Assessment Guidance published in 2003 included a methodology for the assessment of the impacts of visible plumes, however this guidance is now superseded. Nevertheless, an assessment has been carried out so that the outputs can be reported and discussed in **Chapter 14: Landscape and Visual** and **Chapter 15: Cultural Heritage** (ES Volume I - **Application Document Ref. 6.2**).
- B.1.4 The ADMS model set up is identical to that used for the main assessment of pollutant emission, except for the selection of plume visibility in the model set-up and the input of initial water content in the plume. The initial water vapour mixing ratio of the plume is 0.036 kg/kg (mass of water vapour per unit mass of dry release at the stack). ADMS 5 defines the plume to be ‘visible’ at a particular downwind distance if the ambient humidity at the plume centreline is below 98%, above which it is considered the plume would be indistinguishable from clouds. All other model inputs are identical to those detailed for the main assessment.
- B.1.5 The results from the model are shown in Table B1 assuming an emission at 60°C. The results show that the plumes are predicted to be visible for 3% of the time, with average plumes only being very short (<4m). Occasional longer plumes are predicted (up to 632m), however these are predicted to occur for less than 1% of the time.

Table B1: Visible Plumes from the Absorber with a 60°C Release

Met Year	Percentage of Time Plume is Visible	Longest Visible Plume Length	Average Visible Plume Length (m)	Percentage of Year Visible Plume is Over 105m
2015	3%	632m	3.4m	1.1%
2016	3%	475m	1.9m	0.6%
2017	3%	441m	2.7m	1.0%
2018	3%	537m	3.3m	1.0%
2019	3%	487m	1.3m	0.4%

B.2.1 In addition to the potential for visible plumes to occur from the absorber stack, there is also potential for visible plumes to occur from the hybrid cooling towers, recognising that these are plume abated to reduce the potential for visible plumes to form. However, an assessment of the potential for visible plumes to form has been carried out to inform the assessment in **Chapter 14: Landscape and Visual** and **Chapter 15: Cultural Heritage** (ES Volume I - **Application Document Ref. 6.2**).

B.2.2 The indicative cooling infrastructure design (refer to **Application Document Ref. 4.7**) shows 22 cooling cells positioned in a single block, 2 cells wide and 11 cells in length. The potential for visible plumes to occur from the cooling cells has therefore been modelled as shown in Table B2.

Table B2: Cooling Cell Visible Plume Model Inputs

Parameter	Wet Cooling System
Number of vents	22
Release height (m)	20
Vent diameter (m)	12
Flow rate per vent	1,050 kg/s
Water ratio (kg/kg, dry)	0.0064
Temperature (°C)	Ambient

B.2.3 The results for the cooling tower modelling are shown in Table B3. Although the results indicate that a short visible plume may be present for up to 26% of the time once the Proposed Development becomes operational, only two of the five years of meteorological data used in the assessment resulted in plumes greater than 1m.

Table B3: Cooling Cell Visible Plumes

Met Year	Percentage of Time Plume Is Visible	Longest Visible Plume Length (m)	Average Visible Plume Length (m)
2015	18.9%	<1m	<1m
2016	26.2%	<1m	<1m
2017	20.0%	<1m	<1m
2018	20.5%	63m	<1m
2019	20.3%	25m	<1m

ANNEX C ASSESSMENT OF CUMULATIVE IMPACTS

- D.1.1 This Annex provides an assessment of the operational cumulative impacts from the Proposed Development and other industrial emission sources in the vicinity of the Proposed Development Site.
- D.1.2 Cumulative impacts from existing sources of pollution in the area are accounted for in the adoption of site-specific background pollutant concentrations from archive sources and use of available baseline air quality monitoring in close proximity to the Proposed Development site.
- D.1.3 It is recognised, however, that there is a potential impact on local air quality from emission sources which have either received or are may soon receive planning permission or consent but have yet to come into operation. Those that are relevant for consideration due to their air quality impacts are considered to be limited to the adjacent Keadby 2 power station (incorporated into the main assessment) and a single proposed nationally significant infrastructure project (NSIP) - North Lincolnshire Green Energy Park which was notified to PINS in May 2019 and reached Scoping Stage (Scoping Opinion published December 2020). This comprises circa 600ha of development including 760,000 tonnes per annum energy from waste (EfW) (circa 100MW) and associated development. The development is proposed to be located at and around Flixborough Port on the eastern bank of the tidal River Trent.
- D.1.4 The site has road, rail and water links. The associated development includes (but is not limited to):
- carbon dioxide capture plant;
 - offices, business centre and visitor centre;
 - expansion of the riverside wharf to 420m;
 - renewable energy storage (hydrogen, battery storage and steam storage);
 - a new railhead and reinstatement of 6km of railway;
 - an access road;
 - polymer production facility;
 - concrete block manufacturing facility;
 - incinerator bottom ash (IBA) and flue gas treatment (FGTr) facility;
 - hydrogen production;
 - back-up heat and power generation to be fuelled by hydrogen;
 - natural gas, hydrogen and bio methane above ground installations (AGI) and infrastructure;
 - electric vehicle and hydrogen refuelling for vehicles; and

- a heat, cooling, hydrogen gas, carbon dioxide and renewable power off take/export.

D.1.5 Given the early stage (scoping) of this NSIP, limited data is available to enable a quantitative assessment of any likely cumulative impacts. It is noted that PINS has advised the applicant of the need to take the Proposed Development into account in its assessment of cumulative effects. Based upon the timeline advised to PINS, initial information on cumulative effects may accompany the statutory consultation on the energy park, understood to be planned for Q2 2021, with a final assessment of cumulative effects which takes into account the Proposed Development and other relevant developments to be published on submission of their DCO application, currently expected in Q4 2021.

D.1.6 No further assessment has therefore been undertaken here, as no published data yet exists on which an assessment could be based. Consequently, the cumulative effects of the Proposed Development will need to be considered in the cumulative assessment for North Lincolnshire Green Energy Park.