

# 1. Introduction

1.1 This Environmental Statement Addendum has been prepared to provide further environmental information to enable DfI Strategic Planning Division to fully consider arc21's planning application (ref. T/2014/0114/F) for a residual waste treatment project at Hightown Quarry, near Mallusk.

## **Purpose**

1.2 This ES Addendum acknowledges and seeks to primarily respond to submissions made by third parties following the applicant's submissions of further environmental information in March and August 2019, specifically the following representations:

- Letter from TLT Solicitors dated 25 September 2020 on behalf of no-arc21 in relation to the lack of consideration of a proposed Special Protection Area (SPA) in the Habitats Regulations Assessment and the outdated nature of the species-specific surveys being relied upon;
- Objection no. 5218 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to the grid connection offer, carbon intensity of incineration and water usage of the facility;
- Letter from TLT Solicitors dated 30 June 2020 on behalf of no-arc21 in relation to grid connection availability and capacity, waste management hierarchy and PPC permit;
- Letter from TLT Solicitors dated 02 June 2020 on behalf of no-arc21 in relation to potential impact on telecommunication networks by way of direct signal blocking, reflection and scattering;
- Letter from TLT Solicitors dated 30 April 2020 on behalf of no-arc21 in relation to need for the proposal;
- Objection no. 5215 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to need for the proposal;
- Objection no. 5214 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to sustainable development, the precautionary principle and the known impact of incineration of waste as an accelerant of climate change;
- Objection no. 5212 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to the carbon intensity of incineration and water usage of the facility;
- Objection no. 5211 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to compliance with environmental standards for waste incinerators, specifically *'Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under*

*Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration (notified under document C(2019) 7987) (Text with EEA relevance)';*

- Objection no. 5210 (as identified on the Planning Portal) submitted by Colin Buick of no-arc21 in relation to a recently published British Medical Journal report regarding short term exposure to PM<sub>2.5</sub> and impacts on human health;
- Objection no. 5209 (as identified on the Planning Portal) submitted by Richard Gregory in relation to the applicant's obligations under the Habitat Directive with reference to case law Fidelma O'Kane v NIEA/DAERA with Dalradian Gold as Notice Party;
- Objection no. 5196 (as identified on the Planning Portal) submitted by No. 40 Boghill Road in relation to a British Medical Journal regarding long term exposure to particulate matter and impacts on human health; and
- Objection no. 5158 (as identified on the Planning Portal) submitted by Dean Ellison in relation to human health impacts with reference to Chapter 7 of a National Academics Press book entitled '*Waste Incineration and Public Health*'.

1.3 This ES Addendum also seeks to reinforce the applicant's position in relation to the need for the proposed development given the outstanding advice from DAERA Environmental Policy Division (EPD) at the time of writing. The applicant has instructed their own market analysis that considers the current and projected tonnages towards 2035 of residual waste available in Northern Ireland for thermal treatment. The assessment provided also summarises the waste management policy considerations to enable DfI Strategic Planning Division to progress the application to a decision.

1.4 Also by way of update, given the passage of time since the previous Drainage Assessment was submitted in August 2019 for DfI Rivers consideration, the Schedule 6 consent enclosed has since expired. A renewed Schedule 6 consent is therefore enclosed as part of this Addendum for completeness (see Chapter 6).

**Structure and Content**

1.5 This ES Addendum is being volunteered by the applicant and does not follow any formal Regulation 19 request under The Environmental Impact Assessment Regulations (Northern Ireland) 2015 by DfI Strategic Planning Division.

1.6 The professional team that has contributed to the production of this ES Addendum is set out below with their contribution summarised.

**Table 1.1 Summary of Professional Team and Contribution**

Team Member	Area of Responsibility
Arup	Environmental Consultant with responsibility for

	<p>the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Drainage (Schedule 6 consent); and</li> <li>• Ecology.</li> </ul>
Clyde Shanks	<p>Planning consultants and ES Addendum co-ordinator; contribution to the editing and production of ES Addendum in conjunction with the professional team.</p>
Ecology Solutions	<p>Environmental Consultant with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Ecology / sHRA.</li> </ul>
Fichtner	<p>Consulting Engineers with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• IPPC Permit.</li> </ul>
Grant Thornton	<p>Business Consultant with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Socio-Economic Impact (Need for the Proposal).</li> </ul>
Mullan Grid Consulting	<p>Consulting Engineers with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Grid Connection.</li> </ul>
RPS	<p>Environmental Consultant with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Air Quality / Human Health; and</li> <li>• Climatic Factors.</li> </ul>
Tolvik	<p>Environmental Consultant with responsibility for the preparation of ES work relating to:</p> <ul style="list-style-type: none"> <li>• Socio-Economic Impact (Need for the Proposal).</li> </ul>

1.7 In terms of structure, the ES Addendum follows incorporates the following Chapters which seek to respond to the issues raised by objectors by each relevant environmental discipline or topic:

**Table 1.2 ES Addendum Contents**

<b>Chapter No.</b>	<b>Chapter Title</b>
1	Introduction
2	Socio-Economic Impact and Need for the Proposal
3	Material Assets (Grid Connection and Telecommunications)
4	Air Quality and Human Health
5	Climatic Factors
6	Ecology
7	Summary and Conclusions

**Copies of EIA Documentation**

- 1.8 Hard copies of the ES Addendum can be obtained at a cost (see covering letter for details) or CD copies priced at £10 each from the address below.

Clyde Shanks

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- 1.9 Details of where the ES Addendum will be made available for public inspection is set out in the accompanying cover letter.

- 1.10 All application documentation is also available for download at the project website [www.becon.co.uk](http://www.becon.co.uk).