

7. Summary and Conclusions

- 7.1 This ES Addendum has been prepared in response to a number of submissions made by third parties following the applicant's submissions of further environmental information in March and August 2019. It also seeks to reinforce the applicant's position in relation to the need for the proposed development given the outstanding advice from DAERA EPD the time of writing.
- 7.2 This ES Addendum confirms that PPS11 supports proposals for waste management facilities where need is identified in the WMS and WMP. As set out previously, the arc21 WMP determined its capacity requirements based on a longer term view of residual waste requirements beyond the 2020 targets.
- 7.3 Notwithstanding, the 2030 and 2035 targets introduced by way of the EU CEP that will be required to be considered as part of any revised WMS or WMP that are yet to be progressed, set ambitious targets of increased recycling by 65%, a landfill restriction in 2035 and ultimately a cap on landfill of 10% of all municipal waste in 2035.
- 7.4 In order to achieve these ambitious CEP targets and CCC recommendations, strategic waste infrastructure is required to negate the requirement for NI to continue to export its waste. An approach which is not commensurate with the Circular Economy principles of self-sufficiency and proximity as well as being counter intuitive considering an indigenous renewable energy resource is being transported large distances to supply energy to other European households and businesses.
- 7.5 The market analysis provided as part of this ES Addendum confirms that even in achieving the 65% recycling target and assuming the proposed EfW facility is operational based on its intended design capacity there will remain a capacity gap of c.124,000 tonnes in NI in 2035.
- 7.6 arc21 are one of only three Local Authorities or partnerships in the UK generating a significant amount of waste that are yet to procure a long term residual waste solution. In the absence of the proposed solution, NI will miss the opportunity to realise £240m of private investment towards public services, contribute towards renewable energy and climate mitigation targets, enhance NI's security of energy supply and provide a reliable waste management solution.
- 7.7 The requirements of PPS11 have therefore been met insofar a need for the proposed development has been established through the WMS and the relevant WMP which remain extant and entirely consistent with the direction of travel regarding environmental policy and climate change mitigation.
- 7.8 This ES Addendum has also clarified the following in response to the issues raised by third parties in representations received:
- A grid connection offer is in place which addresses any concerns relating to the locational suitability of the application site and the ability to connect to the grid network. It has also been clarified that a G99 connection permit will be required at a later date. This cannot

be provided until the latter stage of the connection process prior to energisation of the generator.

- Consultation has taken place with telecommunication link providers regarding the proposal. From those responses received from Ofcom, JRC and Arqiva to-date, it has been demonstrated that the proposal will not result in any adverse impact on their ability to operate.
- All health related concerns have already been assessed and addressed within the original HIA and the most recent evidence only reinforces its conclusions. The original HIA which considered a hypothetical worse case scenario for particulate matter concluded that population exposure to air quality changes would not result in any measurable change in health outcomes.
- The proposed facility will function as an Energy Recovery (R1) operation and will comply with BAT conclusions. The ES has concluded that the impact of the proposal is acceptable at higher limits and therefore clearly will remain acceptable at any lower limits applied by BAT. Compliance with BAT conclusions and energy efficiency calculations will be required to be demonstrated by the applicant as part of the permitting process and are not a prerequisite of securing planning permission.
- In order to provide an accurate comparison of carbon intensity of EfW to other forms of power generation, the emissions from the alternative waste management solution that is avoided by the use of EfW must also be considered i.e. landfill. It has been demonstrated that the proposed facility would offer significant net GHG emission reductions compared to the baseline of conventional power generation and landfill for waste disposal.
- The proposed facility will not contribute to climate change by way of high water usage. On the basis that the proposed development will not present any significant risk of damage to the environment, the precautionary principle should not apply in the Department's decision-making.
- Detail available on the design of the drainage strategy for the proposals reliably demonstrates that no significant adverse effect will arise on the Flush River, its tributaries or connected European Sites. Therefore, it is considered that no Discharge Consents are required to be issued prior to a HRA being undertaken or the determination of the application.
- Impacts on the Proposed East Coast (Northern Ireland) Marine SPA have been scoped out from further consideration due to the distance between the application site and the proposed SPA and that no new pathways can be identified which could lead to a likely significant effect.
- Updated species-specific surveys have been undertaken in 2020. It is considered that the ecological baseline of the application site is well understood and that the overall

conclusions of the original ES together with the proposed ecological mitigation strategy is fit for purpose and remains robust.