

# Memo

<b>To:</b>	Department for Infrastructure (DfI) - Planning		
<b>From:</b>	Michael McLarnon	<b>Email:</b>	michael.mclarnon@atkinsglobal.com
<b>Phone:</b>	02890788638	<b>Date:</b>	01 <sup>st</sup> August 2019
<b>Ref:</b>	T/2014/0114/F	<b>cc:</b>	
<b>Subject:</b>	Noarc21 Representation (e-mail dated 19 <sup>th</sup> May 2019)		

DfI Planning received an email from the Noarc21 group on 19<sup>th</sup> May 2019 with queries in relation to the air quality and transport assessments undertaken in support of Planning Application T/2014/0114/F. This memo provides clarifications on those queries.

## Air Quality Assessment

No-arc21 stated in their email:

*“We believe the incorrect information has been used in the modelling, the parameter is supposed to be determined from the weather site (Aldergrove), not the polluting site Boghill road, this is in keeping with to AERMOD’s methodology.”*

The AERMOD dispersion modelling utilised meteorological data acquired from Aldergrove, not Boghill Road, as suggested by no-arc21. Aldergrove is the closest weather data available to the application site (approximately 13km) and is therefore the most appropriate set of data for use.

No-arc21 stated in their e-mail:

*“Also please confirm if the modelling system used ADMS is acceptable any known differences from AERMOD which may effect the results provided, lastly the suitability of this ADMS modelling system.”*

The air quality modelling undertaken was done using both AERMOD and ADMS software both of which are industry recognised software packages. AERMOD was utilised for the air quality assessment, with sensitivity analysis also undertaken using ADMS to assess for any variations in predictions (as requested by NIEA) and also to consider the impacts on dispersion as a result of a consented wind farm in proximity to the site.

Over flat terrain both software typically show similar predictions, however in specific circumstances such as complex terrain, AERMOD will invariably predict higher concentrations. Notwithstanding, the sensitivity analysis was undertaken to ensure the assessment provided was robust to account for any variation in results.

## Transport

No-arc21 stated in their email:

*“The route selected for the traffic entering and leaving the site has excluded a significant area of the Mallusk Road from junction of Scullions road to Cottonmount Landfill site, as a significant increase in heavy polluting HGV traffic will arise due to the waste and bottom ash produced by the incinerator thus having to be disposed of at the nearest landfill site (Cottonmount). This route was confirmed by the applicant on a number of occasions as the preferred option in disposing of non-toxic waste from the site.”*

The route for the traffic entering and leaving the site has not excluded, as suggested, a significant area of the Mallusk Road from the junction of Scullions Road to Cottonmount landfill. For the purposes of the Transport Assessment (TA), Cottonmount Landfill was identified as the destination for IBA from the proposed facility. Should an equally suitable alternative facility be identified before the facility is operational, any associated IBA HGV movements travelling to an alternative destination will travel via the strategic route network which

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would not change the robust assessment and conclusions set out within the TA. Alternative locations for IBA would result in negligible changes in traffic movements and would not impact upon the general operation of the local highway network.

The TA has considered the Mallusk Road to Cottonmount landfill both in the context of existing vehicle movements by way of the traffic surveys undertaken (Section 5 of the TA), consideration of existing Council vehicles travelling to Cottonmount (Tables 8.6 and 8.7 of the TA) and the proposed movements i.e. the re-routing of Council vehicles from Cottonmount to the application site (Table 8.11 and Appendix F of the TA). The TA also considered trips from the application site to Cottonmount for the disposal of IBA (Table 8.11 of the TA).

The TA demonstrated the proposed development will result in a reduction in HGV traffic along the Mallusk Road (from the Scullions Link junction to Cottonmount) when compared to the existing flows. No further detailed analysis of this junction was therefore required.

No-arc21 stated in their email:

*“...to date the route for the toxic waste leaving the site has not been confirmed and would therefore request this be given mention within your response. All air quality or traffic surveys to received to date Do not include this section of the road within the application, we would therefore request any consultant response must reflect this lack of information and reject the application.”*

While the end destination of the APCr was not specified, the TA has accounted for the volume of APCr leaving the site (approximately 3 HGVs per day – Table 8.11 of the TA).

The TA has also assumed the APCr entering/leaving the site will utilise the proposed route as detailed in Figure 12.8 of the TA, summarised as follows:

- The Inbound HGVs will leave the strategic highway network at Scullions Road and travel to the proposed facility via Mallusk Road, Hightown Road, Hydepark Road and Boghill Road.
- The Outbound HGVs will travel via routes 3 or 4:
  - Route 3: Boghill Road – Hydepark Road – Hightown Road – Mallusk Road – Scullions Road – Ballyhenry Road;
  - Route 4: Boghill Road – Hydepark Road – Hightown Road – Mallusk Road – Scullions Road – M2.

The air quality assessment for the proposed facility has been based on the operational traffic identified in the TA. The methodology criteria for HGVs are to assess those flows that will change by 200 AADT (Annual Average Daily Traffic) or more. As APCr traffic will not breach the 200 AADT criteria for air quality then further assessment was not required.