

## **CALDERDALE METROPOLITAN BOROUGH COUNCIL**

### **QUESTION UNDER RULE 13 OF THE COUNCIL PROCEDURE RULES**

**Council Meeting:**        **Wednesday, 24 July 2024**

**Question from:**        **Councillor M Hey**

**Question to:**        **Councillor Durrans, Cabinet Member with  
responsibility for Public Services and Communities**

At the cabinet on 3rd of November, in response to a question from Mr C Wilkinson regarding the threat to the health of people in Sowerby Bridge from the proposed waste incinerator, the cabinet replied that:

*“Proper consideration was given to the additional air quality modelling ... to ensure the modelling accurately reflected the tree coverage ... to protect the health of the public and the environment.”*

However, in the Bureau Veritas Air Quality Assessment Peer Review (Section 3.1.4) conducted in 2024, it is noted that:

*“... as part of CERC’s testing ... trees were modelled as buildings. It should be acknowledged that it is considered that there are significant limitations with this approach.”*

Questions:

1. When did the cabinet realise that trees had been modelled as buildings and why wasn’t this included in the response to Mr Wilkinson?
2. What additional assurance did the Cabinet ask to be undertaken when it knew that the modelling was inadequate prior to the permit being granted?

#### **RESPONSE**

The matter of the air quality modelling of trees and the impact this would have on the plume dispersal was raised in the appeal hearing which was decided by the Planning Inspector in July 2023.

The modelling carried out by RPS consultants for CVSH for the 2024 permit submission using the ADMS-5, relies solely on the increase of surface roughness length, rather than using specific heights and distances of either trees or buildings.

The planning Inspector felt there was uncertainty of the effects of the trees on dispersion around the stack and referred to guidance note TGN D1 which advises that trees and porous structures should be modelled by height but half width etc. More akin to buildings.

CERC undertook modelling with trees represented as buildings to demonstrate that representing the trees around the site as buildings has only a very small effect on calculated pollutant concentrations at sensitive receptors and that the approach used by RPS of using surface roughness is a more appropriate methodology.

“... as part of CERC’s testing ... trees were modelled as buildings. It should be acknowledged that it is considered that there are significant limitations with this approach.”

The Bureau Veritas report referred to above states

*The air quality information submitted as part of the application is thorough and details a large number of sensitivity testing to determine the accuracy of modelling. Ultimately, this does show that there is inherent uncertainty in any modelling approach, but it is considered that this is the best method for determining the likely air quality impacts where an installation is not already operational in-situ.*

*The effect of trees on dispersion have been considered in the modelling to the extent possible with the inherent limitations of the dispersion modelling software, but ultimately the software is not designed to account for such effects and the best way to understand the effect of the trees would be to complete monitoring with the SWIP in operation.*

A full review of the air quality modelling including additional sensitivity testing was undertaken by CERC. This was then reviewed again on behalf of the Council by Bureau Veritas to ensure the modelling was reflective of the locality and could demonstrate compliance with the Industrial Emissions Directive.

**NOTE: Questions under Rule 13 must be in writing and submitted to the Head of Legal and Democratic Services by noon the Friday before the Council Meeting.**