
From: Curley, Jane
Sent: 11 August 2022 14:08
To: Planning Comments (SMDC)
Subject: FW: SMD/2022/0088 Pointons Cheddleton - queries

Categories:

Additional EHO comments

Jane Curley (Mrs)
Senior Planning Officer (Majors &
Commercial) ext
Mobile

From: Mccrory, Daniel
Sent: 10 August 2022 17:43
To: Curley, Jane
Subject: RE: SMD/2022/0088 Pointons Cheddleton - queries

Hi Jane,

I'm glad you've asked me these now as I've revisited the reports quickly in looking at you queries and your uneducated eyes are rather spot on, **so do include this email as part of our formal response** – particularly 3rd bit as essentially I will have to state that we do not accept the odour assessment part.

First off though;

- Can you tell me in simple language what is a fugitive and non-fugitive emission?

Yep ; essentially

- non – fugitive emissions are typically known or intended emissions releases from a known source.... so typically the emissions from a chimney or in this case the bio filter bedsthe emissions from these are easier to calculate and to some degree control, with say abatement as you know where the emission is coming from
- fugitive emissions are emissions from a non -point source or the general other emissions from the site as a whole, typically these are unintentional for example the odour associated with the trucks moving round the site or the unloading of the trucks etc that kind of thingmuch a harder to control in general

Hope that makes sense!

- Also on odour if they didn't include the existing factory in the assessment am I right that according to Table 5.4 of the AQ and Odour assessment this proposal alone would unlikely cause an issue?

That is a slightly tricky question to answer – this only dealing with the non-fugitive emissions (so the odour from the filter beds etc) not the other stuff.

But based on their method of assessment, and way of assessing impact ... essentially adopting 1.5 OU (based on IAQM guidance) as the criteria, for significant / not significant (shown in Table 3.10 – page 19) then yes the highest increase (thus bit attributed to the new development) is reported to be 0.46 (R6 in folly lane) and according to this

interpretation of the methodology, considered negligible. [– worth also remembering though odour still has a good degree of subjectivity associated with it]

- They say at para 5.15 that *‘The overall odour concentrations (arising from the proposed biofilters and including the odour emissions from the existing adjacent Advanced Proteins facility) are predicted to be above the relevant Odour Benchmark of 1.5 OUE/m3 at seven of the nearby sensitive receptors. It should be noted however, that the Odour Benchmark is exceeded at six of these receptors without the additional emissions from the new biofilter’* However the table doesn’t show that to my uneducated eye. Am I missing something?

You are quite correct this is an odd or rather incorrect interpretation of these results, based on their own benchmarking! What Table 5.4 actually shows is rather more negative to than described above. This would be my interpretation:

- Quick note ; R11 is the recreational ground – medium sensitivity, but not a residence, so far less weight on the impact should be given there. Also worth noting (also stated in section 5.14 of report) that any odour effect greater than slightly adverse (e.g moderate adverse) is considered to be significant*

Comments

- ❖ With regard to the table, there is clearly only 4 properties (out of 10) that are above the 1.5OU, and so currently experiencing “moderate (or significant*) adverse effects [- not 6 as stated above]
- ❖ With the development in place this raises to 7 (out of 10) experiencing “moderate (or significant*) adverse effects (highlighted in yellow) or 3 of the 10 properties experience a “significant” change e.g:

Table A

Receptor	Current Situation	IAQM descriptor of effect	Proposed	IAQM descriptor of effect	Comment
R1	2.44	Moderately Adverse	2.61	Moderately Adverse	<i>Not significant change</i>
R2	2.39	Moderately Adverse	2.62	Moderately Adverse	<i>Not significant change</i>
R3	1.95	Moderately Adverse	2.17	Moderately Adverse	<i>Not significant change</i>
R4	1.13	Slightly Adverse	1.43	Slightly Adverse	<i>Not significant change but Proposed - 0.07 OU below</i>
R5	1.18	Slightly Adverse	1.55	Moderately Adverse	<i>significant change but Proposed - 0.05 OU above</i>
R6	1.29	Slightly Adverse	1.75	Moderately Adverse	<i>significant change</i>
R7	1.6	Moderately Adverse	1.92	Moderately Adverse	<i>Not significant change</i>
R8	1.46	Slightly Adverse	1.88	Moderately Adverse	<i>significant change Current- 0.04 below</i>
R9	0.85	Slightly Adverse	1.01	Slightly Adverse	<i>Not significant change</i>
R10	0.84	Slightly Adverse	1.07	Slightly Adverse	<i>Not significant change</i>
R11	1.16	Negligible	1.45	Negligible	Medium sensitivity – higher benchmark than others

- ❖ The above noted, it t would be a fair argument to say that the error associated with the model in its predictions (usually assessed by sensitivity analysis or such like) will not be insignificant and will almost

certainly be greater than 0.1 OU. It is also highly unlikely that in reality, the model can predict with any accuracy down to the 0.01 level predicted here.

- ❖ So reducing the sensitivity to 0.1 OU means essentially that results between 1.4 and 1.6 are considered “moderately offensive” rather than this being a hard cut off at 1.5 OU
- ❖ This changes interpretation slightly (changes highlighted in green) but would be more conservative
- ❖ Now the interpretation would be 5 properties (out of 10) that are currently above the 1.5OU, and so currently experiencing “moderate (or significant*) adverse effects
- ❖ With the development in place this raises to 8 (out of 10) experiencing “moderate (or significant*) adverse effects (highlighted in yellow) or (and still) 3 of the 10 properties experience a significant change

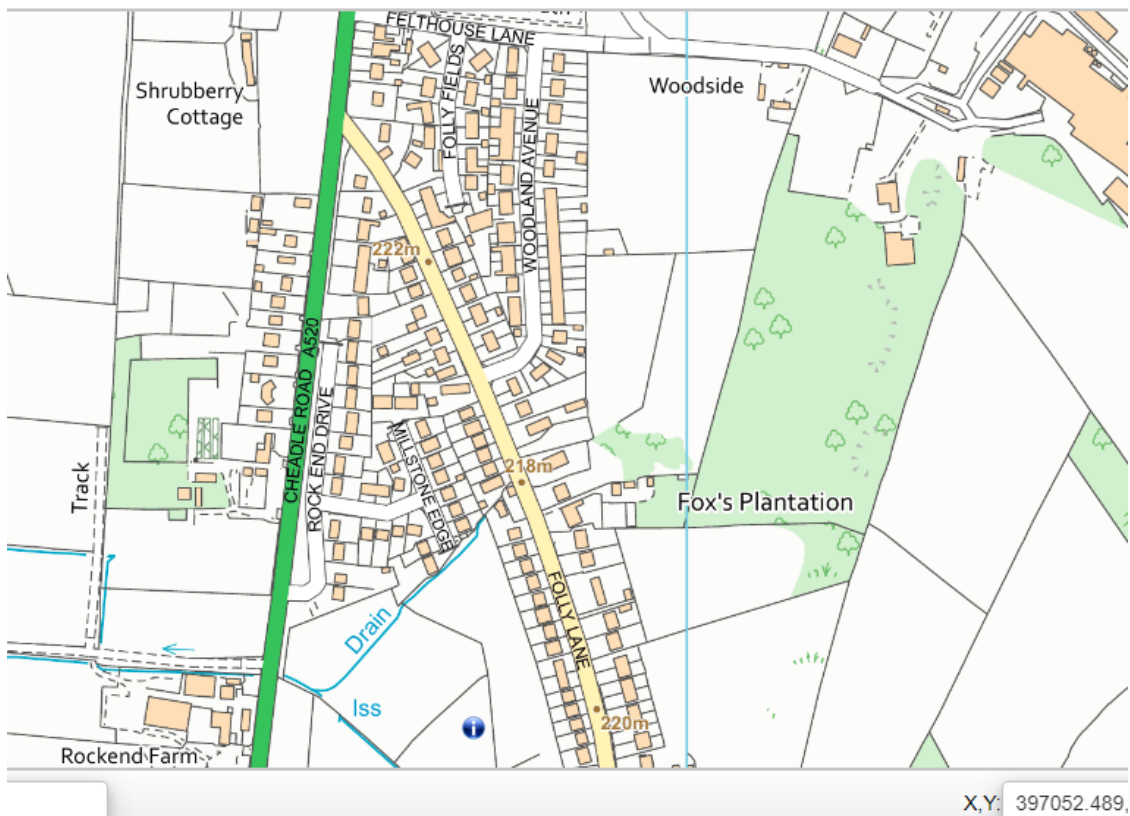
Table B

Receptor	Current Situation	IAQM descriptor of effect	Proposed	IAQM descriptor of effect	Comment
R1	2.44	Moderately Adverse	2.61	Moderately Adverse	
R2	2.39	Moderately Adverse	2.62	Moderately Adverse	
R3	1.95	Moderately Adverse	2.17	Moderately Adverse	
R4	1.13	Slightly Adverse	1.43	Moderately Adverse	significant change
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R8	1.46	Moderately Adverse	1.88	Moderately Adverse	Not significant change
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R10	0.84	Slightly Adverse	1.07	Slightly Adverse	
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Either way you look at the data – as present (Table A) , or the slightly less specific Table B (above), based on the applicants criteria 3 out of 10 residential properties would perceive a significant increase in offensive odours as a result of the development (a move from slightly adverse to moderately advise).

The applicant has also not included any contour mapping of odour levels, to see actually how many properties around the factory will actually perceive a significant odour effect –[(possibly this was not done as no effect was perceived)

In general and based on Figure 3.2, this would appear to be potentially be the properties on woodland avenue and folly lane. No properties to the west of these roads were included as receptors so the impacts there cannot be assessed.



The assessment of the fugitive emissions (section 5.17 – 5.26) not really a quantifiable assessment, more descriptive and is essentially based on a statement or assumption that there will be minimal fugitive emissions as the handling of all the raw material will take place in a negatively pressurized building. I cannot validate this statement but if this is a requirement of their Permit (once it's been varied) then this may be accurate,. The odour from the trucks themselves though is not noted – though this is extremely difficult in all fairness.

As previously stated in the first planning response, the overall conclusions reached by the report (essentially based on non - fugitive emissions assessment) , is essentially that the overall odour potential of the site will increase but the site is already odorous, so the perception of this increase by residents will be negligible.

This conclusion is not accepted and is not supported by the presented data in the report. This data indicates that at least 3 (– possibly 4) of the 10 (example) residential properties modelled will experience a shift from slightly adverse to moderately adverse - odour environment. This potentially translates as the whole of Woodland Avenue and Folly Lane. The impacts on the properties further west (e.g Folly Fields Rock end etc) is not presented

Hope that's OK

Thanks

Dan

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 Staffordshire Moorlands District Council & High Peak Borough Council
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 Leek
 ST13 6HQ
 Direct Dial:

Mobile:

From: Curley, Jane
Sent: 10 August 2022 11:41
To: Mccrory, Daniel
Subject: RE: SMD/2022/0088 Pointons Cheddleton - queries

Thank you Dan

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Jane

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