

Permitting decisions

Variation

We have decided to grant the variation for Kemsley Generating Station operated by K3 CHP Operations Limited.

The variation number is EPR/JP3135DK/V004.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Key issues of the decision

This variation application EPR/JP3135DK/V004 varies an existing permit for a municipal waste incineration plant located near Sittingbourne, Kent. The waste incineration plant is currently permitted to treat non-hazardous waste, primarily refuse-derived fuels (RDF). The plant has been built, and is now in the final stages of commissioning.

This variation authorises the following changes:

- Increase in throughput from 550,000 tonnes to 657,000 tonnes annually.

There have been no changes to emission limits and monitoring requirements as a result of this variation. The variation will provide the same level of environmental protection as in the previous permit.

The sections below summarise the key issues that have been considered during the variation application determination with regards to the changes applied. Aspects of the facility that are not subject to the specific changes applied for through the variation application remain as assessed and permitted under the original permit application determination (and subsequent permit variations).

Assessment of the installation's emissions to air (air quality, human health and ecological impacts)

A methodology for risk assessment of point source emissions to air, which we use to assess the risk of applications we receive for permits, is set out in our guidance 'Air emissions risk assessment for your environmental permit' and has the following steps:

- Describe emissions and receptors
- Calculate process contributions
- Screen out insignificant emissions that do not warrant further investigation
- Decide if detailed air modelling is needed
- Assess emissions against relevant standards
- Summarise the effects of emissions

The methodology uses a concept of 'process contribution' (PC), which is the estimated concentration of emitted substances after dispersion into the receiving environmental media at the point where the magnitude of the concentration is greatest. The methodology provides a simple method of calculating PC primarily for screening purposes and for estimating process contributions where environmental consequences are relatively low. It is based on using dispersion factors. These factors assume worst case dispersion conditions with no allowance made for thermal or momentum plume rise and so the process contributions calculated are likely to be an overestimate of the actual maximum concentrations. More accurate calculation of process contributions can be achieved by mathematical dispersion models, which take into account relevant parameters of the release and surrounding conditions, including local meteorology.

Air dispersion modelling enables the PC to be predicted at any environmental receptor that might be impacted by the plant. Once short-term and long-term PCs have been calculated in this way, they are compared with Environmental Standards (ES).

PCs are considered insignificant if:

- the long-term process contribution is less than 1% of the relevant ES; and
- the short-term process contribution is less than 10% of the relevant ES.

The long term 1% process contribution insignificance threshold is based on the judgements that:

- It is unlikely that an emission at this level will make a significant contribution to air quality; and
- the threshold provides a substantial safety margin to protect health and the environment.

The short term 10% process contribution insignificance threshold is based on the judgements that:

- spatial and temporal conditions mean that short term process contributions are transient and limited in comparison with long term process contributions; and
- the threshold provides a substantial safety margin to protect health and the environment.

Where an emission is screened out in this way, we would normally consider that the Operator's proposals for the prevention and control of the emission to be acceptable. However, where an emission cannot be screened out as insignificant, it does not mean it will necessarily be significant.

For those pollutants which do not screen out as insignificant, we determine whether exceedances of the relevant ES are likely. This is done through detailed audit and review of the Operator's air dispersion modelling, taking background concentrations and modelling uncertainties into account.

Where the PC is greater than these thresholds, the assessment must continue to determine the impact by considering the predicted environmental concentration (PEC). The PEC is the combination of the PC substance to air and the background concentration of the substance which is already present in the environment.

The PECs can be considered 'not significant' if the assessment has shown that both the following apply:

- proposed emissions comply with associated emission levels (AELs) or the equivalent requirements where there is no AEL.
- the resulting PECs will not exceed 100% of the environmental standards

We have assessed the Operator's assessments and we agree with the Operator's conclusions that impacts will not be significant and there will be no exceedances of the relevant environmental standards. Our consideration of the Operator's assessments is described below.

Assessment of Impact on Air Quality

The Applicant's assessment of the impact of air quality is set out in 'Appendix B - Kemsley Generating Station – Air Quality Assessment' part of the Application. The assessment comprises:

- A screening assessment using the Environment Agency screening tool of emissions to air from the operation of the incinerator.
- Dispersion modelling of emissions to air from the operation of the incinerator with increased operating hours.
- A study of the impact of emissions on nearby sensitive habitat and conservation sites.

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the incinerator chimney and its impact on local air quality.

The Applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon local conservation and habitat sites and human health. These assessments predict the potential effects on local air quality from the Installation's stack emissions using the ADMS 5 dispersion model, which is a commonly used computer model for regulatory dispersion modelling. The model used 5 years of meteorological data collected from the weather station at Gravesend between 2012 and 2016. The impact of the terrain surrounding the site upon plume dispersion was considered in the dispersion modelling.

The air impact assessments, and the dispersion modelling upon which they were based, employed the following assumptions.

- First, they assumed that the ELVs in the Permit would be the maximum permitted by Article 46(2) and Annex VI of the IED.
- Second, they assumed that the Installation operates continuously at the relevant long-term or short-term ELVs, i.e. the maximum permitted emission rate.
- Third, the model also considered emissions of pollutants not covered by Annex VI of IED, specifically ammonia (NH₃), polycyclic aromatic hydrocarbons (PAH) and Polychlorinated biphenyls (PCBs).

We are in agreement with this approach. The assumptions underpinning the model have been checked and are reasonably precautionary.

The way in which the Applicant used dispersion models, its selection of input data, and the assumptions it made have been reviewed by the Environment Agency's modelling specialists to establish the robustness of the Applicant's air impact assessment. The output from the model has then been used to inform further assessment of health impacts and impact on habitats and conservation sites.

Our review of the Applicant's assessment leads us to agree with the Applicant's conclusions. We have also audited the air quality and human health impact assessment and similarly agree that the conclusions drawn in the reports were acceptable.

The Applicant's modelling predictions are summarised in the following sections.

Assessment of Air Dispersion Modelling Outputs

The Applicant's modelling predictions are summarised in the tables below.

The Applicant's modelling predicted peak ground level increases in exposure to pollutants in ambient air as a result of this variation. We agreed with the approach taken since the change in predictions is marginal based on previous assessment of impact. We have conservatively assumed that the maximum concentrations occur at the location of receptors.

Whilst we have used the Applicant's modelling predictions in the table below, we have made our own verification calculation of the percentage process contribution.

Table 1 Predicted Maximum Increase in Process Contributions at Short term Emission Limit Values					
Pollutant	Environmental Standard (ES)	Averaging period	Maximum Increase in Process Contribution (PC)		Criteria
	$\mu\text{g}/\text{m}^3$		$\mu\text{g}/\text{m}^3$	% of ES	%
NO ₂	200	1 hour – 99.79 th percentile	2.2	1	10
PM ₁₀	50	24 hour - 90.41 st percentile	0.1	0.2	10
SO ₂	266	15 minute - 99.90 th percentile	4.2	2	10
	350	1 hour - 99.73 th percentile	2.9	1	10
	125	24 hour - 99.18 th percentile	1.5	1	10
HCl	750	1 hour - maximum	1.4	0.2	10
HF	160	1 hour - maximum	0.1	0.06	10
CO	10000	8 hour - maximum daily running	1.4	0.01	10

As can be seen above, impacts from the increases in PCs are all below 10% of the ES, meaning impacts can be screened out as insignificant.

Table 2 Predicted Maximum Increase in Process Contributions at Long term Emission Limit Values					
Pollutant	ES	Averaging period	Maximum Increase in Process contribution (PC)		Criteria
	$\mu\text{g}/\text{m}^3$		$\mu\text{g}/\text{m}^3$	% of ES	%
NO ₂	40	1 hour (annual mean)	0.09	0.225	1
	200	1 hour (99.79 th percentile)	1.1	0.55	10
PM ₁₀	40	24 hour (annual mean)	0.01	0.025	1
	50	24 hour (90.41 st percentile)	0.03	0.06	10
PM _{2.5}	25	24 hour (annual mean)	0.01	0.04	1

SO ₂	266	15 minute (99.90th percentile)	1.04	0.39	10
	350	1 hour (99.73th percentile)	0.74	0.211	10
	125	24 hour (99.18th percentile)	0.37	0.296	10
	50	1 hour (annual mean)	0.03	0.06	1
HCl	750	1 hour (maximum)	0.24	0.032	10
HF	160	1 hour (maximum)	0.02	0.013	10
CO	10,000	8 hour (maximum daily running)	0.72	0.007	10
Cd	0.005	1 hour (annual mean)	3.62E-05	0.724	10
Tl	1	1 hour (annual mean)	3.62E-05	0.004	1
	30	1 hour (maximum)	1.21E-03	0.004	10
Hg	0.25	1 hour (annual mean)	3.62E-05	0.014	1
	7.5	1 hour (maximum)	1.21E-03	0.016	10
Sb	5	1 hour (annual mean)	3.62E-04	0.007	1
	150	1 hour (maximum)	1.21E-02	0.008	10
As	0.003	1 hour (annual mean)	3.62E-04	12	1
Cr	5	1 hour (annual mean)	3.62E-04	0.007	1
	150	1 hour (maximum)	1.21E-02	0.008	10
Co	0.2	1 hour (annual mean)	3.62E-04	0.181	1
	6	1 hour (maximum)	1.21E-02	0.202	10
Cu	10	1 hour (annual mean)	3.62E-04	0.004	1
	200	1 hour (maximum)	1.21E-02	0.006	10
Pb	0.25	1 hour (annual mean)	3.62E-04	0.145	1
Mn	0.15	1 hour (annual mean)	3.62E-04	0.241	1
	1500	1 hour (maximum)	1.21E-02	0.001	10
Ni	0.02	1 hour (annual mean)	3.62E-04	1.81	1
V	1	1 hour (annual mean)	3.62E-04	0.036	1
	5	1 hour (maximum)	1.21E-02	0.242	10

Dioxins and Furans	--	1 hour (annual mean)	6.59E-11	--	1
PAHs	0.00025	1 hour (annual mean)	6.59E-07	0.264	1
PCB	0.2	1 hour (annual mean)	3.30E-06	0.002	1
NH ₃	5	1 hour (annual mean)	3.30E-03	0.066	1

As can be seen, all PCs (except Arsenic and Nickel) are below the relevant criteria for percentage of the relevant ES (1% or 10%), meaning impacts for all other pollutants can be screened out as insignificant.

Although the operator didn't assess impacts from VOCs, they were included in our checks, and were found to be insignificant.

Impacts from As and Ni are assessed below.

The operator also modelled some of the total PCs (not just the increase) at Short-Term and Long Term Emission Limit Values (ELVs), and impacts were assessed as insignificant. This corresponds with the conclusions from increase in PCs, with the only exceedances being As and Ni.

Emissions requiring further assessment

As discussed above the following emissions are considered to have the potential to give rise to pollution in that the PC exceeds 1% or 10% of the long term or short term ES.

- Arsenic
- Nickel

For Arsenic and Nickel, the predictions are based on the assumption that these each comprise the total of the group 3 metals emissions. The operator has stated the IED emission limit applies to all nine of the group 3 metals. If the predicted PC is assumed to apply equally to each of the nine group 3 metals (ie the PCs for As and Ni are divided by 9) the PCs would still be over 1% of the AQS for As. However the operator has stated that this is likely to be conservative assumption as outlined in the document '[Releases from waste incinerators – Guidance on assessing group 3 metal stack emissions from incinerators' version 4 \(28 June 2016\)](#)', which outlines monitoring data from 18 Municipal Waste Incinerators and Waste Wood Co-Incinerators between 2007 and 2015. For arsenic measured concentrations were between 0.04 to 5.0% of the group 3 metals IED emission limit value. For nickel the measured concentrations ranged from 0.5 to 44.0 % of the group 3 metals IED emission limit value. For worst case scenarios, we have assessed at 5% for As and 44% for Ni, and the results are presented below.

Table 3 Predicted Maximum Increase in Process Contributions at Long term Emission Limit Values for As and Ni					
Pollutant	ES	Averaging period	Maximum Increase in Process contribution (PC)		Criteria
	µg/m³		µg/m³	% of ES	%
As (5% of the ELV)	0.003	1 hour (annual mean)	1.81E-05	0.6	1
Ni (44% of the ELV)	0.02	1 hour (annual mean)	1.5E-04	0.8	1

As can be seen, the PCs are both below the 1% criteria, and so can be screened out as insignificant.

Abnormal operations were checked in our assessments, and we can conclude that PCs will not cause an exceedance at human health receptors.

In conclusion, the Environment Agency is in agreement with the applicant that the air quality effects of the proposed development are not considered to be significant.

Impacts on Habitats sites, Sites of Special Scientific Interest and non-statutory conservation sites

Sites Considered

The following Habitats (i.e. Special Areas of Conservation, Special Protection Areas and Ramsar) sites are located within 10Km of the Installation:

- Swale SPA
- Swale Ramsar
- Medway Estuary and Marshes SPA
- Medway Estuary and Marshes Ramsar
- Thames Estuary and Marshes SPA
- Thames Estuary and Marshes Ramsar
- Queendown Warren SAC
- Outer Thames Estuary SPA

The following Sites of Special Scientific Interest are located within 2Km of the Installation:

- The Swale SSSI

The following non-statutory local wildlife and conservation sites are located within 2Km of the Installation:

- Milton Creek Local Wildlife Site
- Elmley National Nature Reserves

Habitats Assessment

We reviewed the Applicant's Habitats assessment and agreed with the assessment's conclusions, specifically that there would be no likely significant effect on the interest features of the protected sites.

Table 4 The Swale SPA/Ramsar/SSSI Impacts from NO_x, SO₂, NH₃			
Pollutant	ES	Increase in Process Contribution (PC)	
Unit	µg/m³	µg/m³	% of EAL
NO _x annual mean	30	0.1	0.3%
SO ₂ annual mean	20	<0.05	0.25%
NH ₃ annual mean	3	0.003	0.1%

As PCs are below 1% of the relevant ES, they can be screened out as insignificant.

Table 5 Medway Estuary and Marshes SPA and Ramsar, Thames Estuary and Marshes SPA and RAMSAR, Queendown Warren SAC and SPA Impacts from NO_x, SO₂, NH₃

Pollutant	ES	Increase in Process Contribution (PC)	
		Unit	% of EAL
NO _x annual mean	30	<0.05	0.17%
SO ₂ annual mean	20	<0.05	0.25%
NH ₃ annual mean	3	<0.0005	0.02%

As PCs are below 1% of the relevant ES, they can be screened out as insignificant.

Table 6 – Maximum modelled nutrient nitrogen deposition at ecological receptors

Ecological receptor	Minimum Critical load (C _{LO}) (kgN/ha/yr)	Increase in PC (kgN/ha/yr)	Increase in PC% of Critical load
The Swale SPA/Ramsar/SSSI	10	0.04	0.4%
Medway Estuary and Marshes SPA and Ramsar	8	0.01	0.125%
Thames Estuary and Marshes SPA and RAMSAR	8	<0.005	0.06%
Queendown Warren SAC and SPA	15	<0.005	0.03%

Table 7 – Maximum modelled acid deposition at ecological receptors			
Ecological receptor	Minimum Critical Load (C_{LO}) (kgN/ha/yr)	Increase in PC (kgN/ha/yr)	Increase in PC% of Critical load
Queendown Warren SAC and SPA	0.856	<0.0005	0.06%
NB According to Air Pollution Information System the other designated sites are not sensitive to acid deposition so have not been considered further			

As can be seen in tables 6 and 7, increased impacts from acid deposition and nitrogen deposition are under 1% of the C_{LO} and so can be screened out as insignificant.

Although impacts from HF were not included in the operator's assessment, we included these in our checks and confirmed that impacts screen out as insignificant.

Assessment of other conservation sites

Conservation sites are protected in law by legislation. The Habitats Directive provides the highest level of protection for SACs and SPAs, domestic legislation provides a lower but important level of protection for SSSIs. Finally the Environment Act provides more generalised protection for flora and fauna rather than for specifically named conservation designations. It is under the Environment Act that we assess other sites (such as local wildlife sites) which prevents us from permitting something that will result in significant pollution; and which offers levels of protection proportionate with other European and national legislation. However, it should not be assumed that because levels of protection are less stringent for these other sites that they are not of considerable importance. Local sites link and support EU and national nature conservation sites together and hence help to maintain the UK's biodiversity resilience.

For SACs SPAs, Ramsars and SSSIs we consider the contribution PC and the background levels in making an assessment of impact. In assessing these other sites under the Environment Act we look at the impact from the Installation alone in order to determine whether it would cause significant pollution. This is a proportionate approach, in line with the levels of protection offered by the conservation legislation to protect these other sites (which are generally more numerous than Natura 2000 or SSSIs) whilst ensuring that we do not restrict development.

Critical levels and loads are set to protect the most vulnerable habitat types. Thresholds change in accordance with the levels of protection afforded by the legislation. Therefore the thresholds for SAC SPA and SSSI features are more stringent than those for other nature conservation sites.

Therefore we would generally conclude that the Installation is not causing significant pollution at these other sites if the PC is less than the relevant critical level or critical load, provided that the Applicant is using BAT to control emissions.

Consideration of Local Factors

Impact on Air Quality Management Areas (AQMAs)

Swale Borough Council has declared 4 Air Quality Management Areas (AQMAs) with respect to NO₂ due to road traffic. These are located as follows:

- AQMA 1 – Newington AQMA, 6 km west of the Site.

- AQMA 2 – Ospinge Street, Faversham, 9.7 km southwest of the Site.
- AQMA 3 – East Street, Sittingbourne, 3 km south of the Site.
- AQMA 4 – St Pauls Street, Sittingbourne, 2.8 km south of the Site.

Although the operator has not modelled predictions at any receptors within these areas, we included impacts within our checks. We found that the degree of change in predictions is insignificant.

Human health risk assessment

Comparing the results of air dispersion modelling as part of the Environmental Impact assessment against European and national air quality standards effectively makes a health risk assessment for those pollutants for which a standard has been derived. These air quality standards have been developed primarily in order to protect human health via known intake mechanisms, such as inhalation and ingestion. Some pollutants, such as dioxins, furans and dioxin like PCBs, have human health impacts at lower ingestion levels than lend themselves to setting an air quality standard to control against. For these pollutants, a different human health risk model is required which better reflects the level of dioxin intake.

Models are available to predict the dioxin, furan and dioxin like PCBs intake for comparison with the Tolerable Daily Intake (TDI) recommended by the Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment, known as COT. These include the HHRAP model.

Human Health Risk Assessment Protocol (HHRAP) has been developed by the US EPA to calculate the human body intake of a range of carcinogenic pollutants and to determine the mathematic quantitative risk in probabilistic terms. In the UK, in common with other European Countries, we consider a threshold dose below which the likelihood of an adverse effect is regarded as being very low or effectively zero.

The TDI is the amount of a substance that can be ingested daily over a lifetime without appreciable health risk. It is expressed in relation to bodyweight in order to allow for different body size, such as for children of different ages. In the UK, the COT has set a TDI for dioxins, furans and dioxin like PCB's of 2 picograms I-TEQ/Kg-body weight/day (N.B. a picogram is a millionth of a millionth (10⁻¹²) of a gram).

In addition to an assessment of risk from dioxins, furans and dioxin like PCB's, the HHRAP model enables a risk assessment from human intake of a range of heavy metals. In principle, the respective ES for these metals are protective of human health. It is not therefore necessary to model the human body intake.

For dioxins, furans and dioxin like PCBs, the principal exposure route is through ingestion, usually through the food chain, and the main risk to health is through accumulation in the body over a period of time. The human health risk assessment calculates the dose of dioxins and furans that would be received by local receptors if their food and water were sourced from the locality where the deposition of dioxins, furans and dioxin like PCBs is predicted to be the highest. This is then assessed against the Tolerable Daily Intake (TDI) levels established by the COT of 2 picograms I-TEQ / Kg bodyweight/ day.

The results of the Applicant's assessment of dioxin intake showed that the predicted daily intake of dioxins, furans and dioxin like PCBs at all receptors, resulting from emissions from the proposed facility, were significantly below the recommended TDI levels.

Our Human Health Risk Assessment screening checks agreed that the PC is likely to be less than 10% of a TDI of 0.29 pgTEQ/kg(BW)/day, and is therefore not considered to be significant.

Energy Efficiency

There is no change to the technologies or techniques used at the facility as a result of this variation, and the increased throughput will result in an increased gross electrical output of 68.66 MWe. This equates to an electrical efficiency of 33.6%, which falls within the BAT-associated energy efficiency level (BAT – AEEL) range provided in the final draft waste incineration BREF for an incineration plant using a condensing turbine of 20% - 35%.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> Public Health England Food Standards Agency Kent County Council Director of Public Health Health and Safety Executive Fire Service <p>The comments and our responses are summarised in the consultation section.</p>
The site	
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>

Aspect considered	Decision
	The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment all emissions may be categorised as environmentally insignificant.
Operating techniques	
General operating techniques	There are no new operating techniques as a result of this variation, and all existing operating techniques continue to apply. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.
Permit conditions	
Monitoring	Monitoring has not changed as a result of this variation.
Reporting	Reporting has not changed as a result of this variation.
Operator competence	
Management system	There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, newspaper advertising and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Public Health England
Brief summary of issues raised
Appropriate monitoring to be in place. Consult Local Authority on impacts upon human health of contaminated land, noise, odour, dust and other nuisance emissions. Consult Food Standards Agency for potential of deposition on land for farming of crops or animal rearing. Consult Director of Public Health for issues relating to wider public health impacts.
Summary of actions taken or show how this has been covered
No changes to appropriate monitoring in place, and recommended consultees contacted.