

<b>DECISION-MAKER:</b>	PLANNING & RIGHTS OF WAY PANEL
<b>SUBJECT:</b>	PROPOSED SOUTHAMPTON BIOMASS PLANT, WEST BAY ROAD LPA REF: 12/00749/PREAP1
<b>DATE OF DECISION:</b>	24 JULY 2012
<b>REPORT OF:</b>	PLANNING & DEVELOPMENT MANAGER
<b>STATEMENT OF CONFIDENTIALITY</b>	
N/A	

### **BRIEF SUMMARY**

The City Council was consulted last year for its views on a proposed biomass power plant in Western Docks of the Port of Southampton. Before the Council made its formal comment 'the promoter' of the scheme, Helius Energy plc, released a press statement confirming that the scheme was to be reviewed.

The City Council has been formally consulted again by Helius Energy plc regarding its revised proposals for a 100 Megawatt biomass fuelled electricity generating station (with the capability to provide heat) in a revised location on land in the Western Docks. A site location plan is attached at **Appendix 1**.

The key changes to the proposals are:

- The site location has been changed to achieve a greater separation between the power plant and the nearest residential property (from 125 to 250 metres);
- The form of the buildings has been amended and three different architectural approaches have been submitted for public comment;
- The building heights have been reduced (by between 5-10 metres) for the majority of the buildings with the location of the main boiler house changed;
- The option of using hybrid cooling towers has been discounted removing the potential for water vapour plumes from the cooling assembly;

The project is designated as a Nationally Significant Infrastructure Project (NSIP) for the purposes of planning control and will not be determined by the Council. Instead, at this pre-application stage, the Council has until 3rd August 2012 to provide its formal written comments to the current proposals prior to the finalisation of the scheme and its formal submission as an application to the National Infrastructure Directorate (NID) at the Planning Inspectorate (formerly known as the Infrastructure Planning Commission (IPC)). The NID is an independent body set up to decide applications for NSIPs, giving consideration to both the local and national impacts of a proposed scheme. The Council's comments at the pre-application and formal application stage will form a material consideration in this process.

The revised Primary Development Area remains within the red line boundary of the area set out within the original submission, although has been moved some 140

metres closer to the river. Feedback on the three design approaches will inform the selection of the final design that will form the basis of the formal application. The formal application will be supported by an Environmental Statement as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and agreed by the IPC in its Scoping Opinion dated November 2010.

A summary of the planning application process for NSIPs is attached at **Appendix 2**.

The following report summarises the proposal, sets out the key issues for consideration, and provides a recommendation for the Council's formal response to the technical submission.

### **RECOMMENDATIONS:**

- (i) The recommendations and findings of this report are noted and a HOLDING OBJECTION based on the submitted details and a lack of information is reported formally to Helius by 3<sup>rd</sup> August 2012 in response to their formal pre-application consultation with the City Council under Section 42 of the Planning Act 2008. A summary of the recommendations is attached at **Appendix 3**;
- (ii) That it is recommended to Helius that any formal application to the NID should be supported by a Health Impact Report as required by Policy CS10 of the Council's adopted Core Strategy (2010);
- (iii) Delegation is given to the Planning & Development Manager to comment, following consultation with the Chair of the Panel, on the adequacy of the consultation exercise when notified by NID. This requires a 14 day turnaround from receipt; and,
- (iv) Despite the objections raised by the Council delegation is given to the Planning & Development Manager to work with the applicants to prepare a draft Development Consent Order ('planning conditions') and draft Development Consent Obligation ('S.106 legal agreement) for submission to the NID in due course. The obligation is to include as a minimum:
  - a) Employment & Skills Training;
  - b) Off-site landscaping;
  - c) Strategic & Site Specific Transport Contributions;
  - d) Off-site heat user study;
  - e) TV reception study (pre & post construction);
  - f) Highway Condition Survey (pre & post construction); and
  - g) Off-site air quality monitoring.

### **REASONS FOR REPORT RECOMMENDATIONS**

- 1 The Council has been consulted formally for its planning response to the Further Technical Consultation Document (May 2012).

## **DETAIL (Including consultation carried out)**

### **2.0 BACKGROUND**

The Climate Change Act (2008) provides a legal framework for tackling climate change. The Act requires that Greenhouse Gas emissions are reduced by at least 80% by 2050, compared to 1990 levels.

2.1 Southampton Biomass Power, a subsidiary of Helius Energy, is intending to submit an application for Development Consent to the NID under Section 37 of the Planning Act 2008. They are referred to within this report as the scheme's 'promoter'.

2.2 As with the 2011 proposals the current application proposes a 100 megawatt biomass power plant on the Western Docks. The specific detail and location within the docks have changed following the first round of public consultation so that now 3 preferred architectural responses have been put forward by the promoter. At this pre-application stage the promoter has asked the City Council for its views on the principles and merits of siting a large biomass power plant on the Western Docks. The Council's views will form a material consideration at the determination stage and will, hopefully, be used by the promoter to prepare their application.

2.3 The current deadline for a response to Helius Energy plc is 3<sup>rd</sup> August 2012.

2.4 The application has attracted local opposition and a copy of the standard objection response letter received is attached to this report at **Appendix 4**. It identifies those issues that other third parties have raised during this consultation exercise.

### **3.0 THE SITE**

The application site is located within the Port of Southampton's Western Docks, approximately 1.5 kilometres from Southampton City Centre.

3.1 The revised Primary Development Area comprises the south west portion of the original area along with a new area located to the south east and to the south west of, and including, the existing alignment of West Bay Road. The land is flat with a hard-standing surface covering the majority of the site. West Bay Road runs through the centre of the site. The revised proposals will include the relocation of this internal Port road to the north of the revised Primary Development Area. The site is currently operated by ABP with the exception of an area to the northeast which is currently under agreement with a third party for car storage.

3.2 An automobile oil filter factory was previously located on the northern section of the site and a communication cable manufacturing plant was previously

located on the southern area of the site. Both areas are now utilised for bulk storage (including road salt, aggregates, minerals, glass cullet and biomass cargoes) along with the storage of cars and general containers.

- 3.3 The nearby King George V dock is a Grade II listed structure and 396 and 371 Millbrook Road are Grade II listed buildings.
- 3.4 Vehicular access to the site is obtained through a private system of internal port access roads, from Dock Gate 20, located west of the subject site. Access can also be obtained from Dock Gates 8 and 10. Dock Gate 20 provides direct access to the principal highway network, along First Avenue. The M271 is approximately 1.5 kilometres to the northwest from Dock Gate 20, along the A35. The M271 heads north to join the M27 at Junction 3.
- 3.5 The site is located within the Freemantle ward of the City of Southampton. The closest residential development is located approximately 250 metres from the site's northern boundary (approximately double the distance originally proposed).

4.0 **THE PROPOSAL**

**i) The Scheme**

The promoter is seeking to develop a number of commercial biomass fuelled power plants around the UK and investigations are ongoing on a number of potential sites. They suggest that there are a number of essential or desirable characteristics for a suitable site, including:

Site	Location to source of biomass Unencumbered ownership Site availability
Site Area	18-20 acre minimum area
Access	Access to Port facilities for import of fuel Access to road and rail facilities
Other Site Issues	Satisfactory Ground Conditions
Utilities	Existing on-site energy facilities Electricity import capacity Electricity connection for export Water discharge arrangements Water supply Availability of other utilities
Feedstock Supply	Facilities to allow delivery of feedstock Deep water facilities Biomass available in the locality
On-site Energy Demand	Demand for heat/steam use in the vicinity

Environmental	Demand for electricity in the locality Distance from local sensitive receptors
Workforce	Reasonable prospect of securing consent Potential availability of local workforce

- 4.1 In this case electricity generated by the scheme will be exported to the electrical network through underground cables connecting to the 132kV overhead lines running adjacent to the site and will produce the equivalent to the average electrical consumption of about 200,000 homes.
- 4.2 The revised primary development area comprises an area of land of approximately 8.1 hectares (20 acres) – the same as that previously identified. The plant will utilise up to 800,000 tonnes (as delivered) of biomass material per annum. This will be a 24 hour operation with deliveries (by road) restricted to avoid anti-social hours.
- 4.3 The construction and commission period for the project is expected to be approximately 36 months. It is anticipated that construction activities could commence in 2014. Operation is not anticipated until 2017. The scheme will have an operational life of some 35 years and will be demolished at the end of its lifetime.
- 4.4 **ii) Biomass**  
The biomass plant will be fuelled predominately from biomass transported to site by sea, although locally sourced biomass will be used where available and transported to the site by road. Biomass fuel feedstocks will comprise wood fuel in the form of virgin wood fibre (whole logs, chipped roundwood, slabwood, offcuts, peelings, butt reducing chips and bark), recycled wood and energy crops together with other biomass material including residues from processing cereals (wheat and barley) and oilseeds all supplied in the form of logs, loose material, chips, pellets or briquettes, that qualify as renewable fuels under the provisions of the Renewables Obligation 2009.
- 4.5 The plant will not use general domestic or hospital waste, maize, hazardous waste or liquid biomass, for example, vegetable oils.
- 4.6 Unless there is clear evidence that harvesting does not interfere with the nature protection, the proposed scheme will not use feedstock or fuel from protected areas; areas where biodiversity is shown to be vulnerable or at risk; primary forest or other forest with high biodiversity value; and, areas or plantations which threaten protected or endangered species.
- 4.7 Fuel storage for up to 14 days usage of fuel will be constructed resulting in fuel storage with a capacity of circa 200,000 cubic metres.

- 4.8 The plant will utilise up to 800,000 tonnes of biomass material per annum. A maximum of 200,000 tonnes could be delivered by road with the majority arriving by boat. It is understood that the promoter's contract with ABP requires a minimum of 500,000 tonnes to be handled by the Port. The promoter has the option, under the current quantities to up this to 600,000 tonnes should circumstances dictate this to be necessary.
- 4.9 The majority of the fuel required will be sourced from UK and international sources (including Southern Europe, North West Europe, Western Africa and the Americas) and delivered through the Port of Southampton's Bulks Terminal. Fuel delivered by ship will be transferred from the quay to the biomass store via a purpose built conveyor. The promoter has entered into a commercial contractual arrangement with ABP that guarantees the delivery of a minimum volume of 500,000 tonnes through the Port of Southampton's Bulks Terminal per annum. Each container ship would have a capacity of between 30,000 and 45,000 tonnes. The commercial agreement provides flexibility to allow all or part the remaining volume of required feedstock to also be delivered through the Bulks Terminal, depending on the final fuel mix. Based on the above, it is anticipated that the frequency of deliveries through the Bulks Terminal will amount to approximately 2-3 deliveries per month.
- 4.10 Ongoing investigations have resulted in the reduction of locally sourced fuel from 300,000 tonnes per annum originally envisaged. Therefore, under normal operating conditions, it is now anticipated that up to 200,000 tonnes of biomass fuel per annum may be sourced locally (Hampshire, Sussex, Wiltshire, Dorset, Berkshire, Surrey, Greater London are specified), if commercially available, and delivered to the site by road. It is anticipated that such material is likely to comprise predominately recycled wood. 200,000 tonnes equates to approximately 27 HGVs per working day (with no deliveries Saturday afternoon or Sundays) with an additional 6 HGV movements per day required to service the plant and remove the ash. All trips, including staff movements, equate to approximately 122 per day
- 4.11 **iii) The Buildings – Key Changes since 2011**  
The layout and external design of the proposed scheme have been amended following the previous consultation exercise. In particular the promoter has sought to reduce the impact of their proposals and have submitted three different design approaches that each utilise the maximum building parameters listed. Distances from the nearest residential property of approximately 250 metres to the site boundary, 270 metres to the boiler house, approximately 255 metres to the main fuel store building, approximately 280 metres to the stack and approximately 350 metres to the air cooled condensers are now proposed.
- 4.12 The heights of the principal buildings have been reduced, where practicable,

including a reduction of 10 metres to the boiler house from 70 metres to 60 metres, a reduction of 5 metres from the main biomass fuel store from 47 metres to 42 metres, a reduction of 8.5 metres from the auxiliary fuel store from 39 metres to 30.5 metres and a reduction of 5 metres from the fuel delivery building from 25 metres to 20 metres. The building footprints have also been reduced, including the boiler house and fuel delivery building, achieving a reduction in total building footprint on the site of some 2,000sq.m.

4.13 That said, the steam turbine building has been increased in height by 4 metres with an increased footprint. The fly ash silo has also increased in height by 4 metres. A full list (including dimensions and comparison heights with the previous proposals) of the principal buildings proposed is attached at **Appendix 5.**

4.14 As part of the engineering, design and layout review of the plant works to the listed George V Dock no longer form part of the proposals.

4.15 **iii) The Buildings – 3 Alternative Approaches**

The promoter has produced three alternative themed approaches to the external design of the scheme, based on a common layout. These have been identified as follows:

4.16 Marine Design Approach

The form of this approach is inspired by shipping and containers. The upper part of the main boiler house has been designed to take on the characteristic of a bridge of a ship. When viewed from medium to long distances, it is intended to be suggestive of a container ship.

4.17 Wave Design Approach

The form of this approach is inspired by waves. The curved roof form has been designed so that each building effectively 'flows' into each other.

4.18 High Tech Design Approach

The form of this approach highlights the industrial nature of the plant. A number of red coloured panels will be incorporated within the cladding in various patterns.

4.19 Feedback received on each of the three design approaches will inform the selection by the company of a single architectural approach for inclusion within the submitted application.

4.20 **v) Access**

The scheme will also include internal access roads and hard-standing for

vehicles. Vehicular access to the site is obtained through a private system of internal port access roads from Dock Gate 20.

4.21 Pedestrian access to the site can be achieved through the private system of internal port access roads. Footways are provided along all internal Port roads. Cycle routes run along the A33 adjacent to the Port.

4.22 Car parking for employees and visitors will be provided to allow parking for 28 cars. Space for the storage of up to 6 cycles will also be provided.

4.23 Following further investigations, it has been determined by the promoter that deliveries of fuel feedstock by rail are unlikely to be commercially viable due to the relatively short distances from local sources to the Port.

4.24 **vi) Lighting and Landscaping**

The site will require external lighting of the principal working areas for health and safety purposes. The form of the lighting would be directional lighting units mounted on columns or directly onto buildings. This would include low level lighting on roadways and pedestrian routes. It is not anticipated that high level lighting would be required.

4.25 Due to the scale of the buildings it is considered by the promoter that on-site landscaping would be an effective visual mitigation strategy. An off-site landscaping scheme is therefore proposed.

4.26 **vii) Construction Phase**

Construction working hours will be 7am to 8pm Monday to Friday and 7am to 1pm on Saturdays. These hours exceed the Council's normal restriction where there is a residential neighbour, but are considered to be appropriate for operational port land. Depending on the stage of construction it is currently anticipated that HGV movements will range on average from 5-80 movements per day, with a maximum of 100 HGV movements (ie. 50 deliveries) on any one day. All vehicle trips are estimated at 73 vehicles (or 146 trips) per day.

4.27 **viii) Job Creation**

The proposal is expected to create 53 construction jobs (leading to 450 at peak) and it is currently expected that approximately 40 staff will be employed once operational. Approximately half of the employees will hold a minimum of a degree level qualification.

4.28 **ix) Heat Loss**

The scheme will be designed such that, if a commercial opportunity to supply heat or steam emerges, pipe work can be installed to the site boundary for



the provision of heat or steam. A separate application will be made for any off site infrastructure works required. The promoter will provide funding for a study to consider the feasibility of developing and operating a commercially viable heat infrastructure scheme to serve the locality. The promoter proposes to set up a Community Interest Company to progress investigations post decision.

## 5.0 **CONSULTATION**

There is no statutory requirement for the City Council to undertake a formal consultation following the receipt of this pre-application submission. Instead, the applicant is expected to follow the agreed Further Statement and Strategy of Community Consultation that was last considered by the Planning & Rights of Way Panel in April 2012.

5.1 Following the submission of the Further Technical Consultation Document in May 2012 the Council's website was updated to provide links to the relevant documents. A leaflet explaining the role of the Council in this process, and how third parties could make comment, was also added. This leaflet was made available by the promoter at their consultation events and a copy is reproduced at **Appendix 6** of this report. As agreed with the Panel in April the applicant's consultation events took place on 12<sup>th</sup> June (Millbrook), 20<sup>th</sup> June (Marchwood), 26<sup>th</sup> June (Freemantle), 3<sup>rd</sup> July (Marchwood) and 5<sup>th</sup> July (Millbrook).

5.2 In addition to seeking comment from internal consultees, all Ward Councillors have been formally notified of the submission.

5.3 To date, the Council has received **58 objections** from third parties concerning the revised proposal. The issues raised by residents are addressed in the 'Key Issues' section of this report and, in the main, are identified in the standard objection letter attached at **Appendix 4**.

5.4 It should be noted that the previous pre-application submission (11/00220/PREAP1) attracted some **780 representations** and a petition with 3602 signatures. The promoter has confirmed that it is not necessary for respondents to repeat comments made through the original consultation phase.

5.5 In due course the promoter will prepare a Consultation Report to accompany their formal application to the NID, which will include a copy of all formal responses to this consultation phase. It will detail the type of public engagement undertaken with details of how the scheme has evolved. The Council will be given 14 days at the acceptance stage of the application process to comment on the adequacy of the consultation undertaken in accordance with section 55(4) of the Act. A Panel delegation is recommended to enable officers to prepare the Council's formal response and meet the tight deadline imposed by the process.

## 6.0 **PLANNING HISTORY**

The 1871 map indicated the site was part of a tidal plain consisting of mud flats. Analysis of historic maps has shown that this site was situated on an area of land which was in the River Test until it was reclaimed as part of the 1930s dock extension scheme. By 1934 the land had been reclaimed due to construction of a barrier to the south. The site was then developed as part of the Solent Mills passenger/goods dockland up until 1947 when a motor works factory building was present, noted as an “Automobile and Electrical Product Works” in 1952- 1956. Additional buildings, including a depot and tanks were also present from 1947. A railway line ran through the site from 1945 until 1992/3.

- 6.1 The Planning Panel resolved to grant planning permission in April 2006 for the redevelopment of land along Western Avenue (to the north west of the Helius site) to provide a combined heat and power station with associated plant including two flues up to 40m in height, three flues up to 15m in height, three 25m high oil storage tanks and vehicular access from Western Avenue. (LPA ref: 06/00010/FUL refers). This permission was not implemented and has since lapsed.

## 7.0 **PLANNING POLICY**

The relevant planning policy to be used in the consideration of this scheme is divided between national and local level. Both are supportive in principle of biomass. A summary of the relevant planning policy framework for these proposals is attached at **Appendix 7**.

## 7.1 **PLANNING CONSIDERATIONS**

In terms of the key issues the Further Technical Consultation Document (May 2012) is broken into the following planning issues:

- i) Air Quality & Emissions
- ii) Landscape & Visual Effects
- iii) Ecology
- iv) Historic Environment
- v) Geotechnical and Geo-Environmental
- vi) Flooding & Site Drainage
- vii) Highways & Movement
- viii) Noise & Vibration
- ix) Daylight & Sunlight Impacts
- x) Social & Economic Effects
- xi) Hazardous Installations
- xii) Other Environmental Issues

7.2 This report will discuss each of these issues in turn, with input from the relevant internal consultees, following an initial assessment of the principles involving biomass and a development of the type proposed on operational port land. Specialists external to the Council, including at the Environment Agency and Natural England for instance, have been consulted independently and their views will be reported to the promoter ahead of the 3<sup>rd</sup> August consultation deadline.

## 8.0 **PRINCIPLE OF BIOMASS**

### 8.1 **i) Biomass**

The Government's National Planning Statement EN1 states that *'biomass is a significant source of renewable and low carbon energy. It involves the combustion of fuel, such as wood, which is renewable because, through replanting and regrowth, the biomass can be replaced in a matter of decades and this cycle can be continuously repeated. Whilst energy is required to grow, harvest and transport it, biomass is considered to be low carbon, providing that the biomass has been cultivated, processed and transported with due consideration of sustainability. Its combustion also displaces emissions of carbon dioxide ordinarily released using fossil fuels'* (paragraph 3.4.3 refers). Paragraph 3.4.4 adds that *'the ability of biomass...to deliver predictable, controllable electricity is increasingly important in ensuring the security of UK supplies'*.

8.2 Officers therefore agree that the project would make a measurable contribution to the production of renewable energy through the generation of renewable electricity. All other things being equal, this production would

have the effect of displacing the use of electricity and fuels otherwise derived from fossil fuels and would assist the move towards a low(er) carbon economy. The plant would potentially increase diversity and security of energy supply by using a wider range of fuels.

8.3 The promoter's model predicts that the scheme will achieve greenhouse gas emissions savings of 83% when compared against EU's fossil fuel comparator, thereby exceeding the Renewable Energy Directive target of 60% savings.

8.4 The overall effect of these factors would be to assist the achievement of the Government's objective of reducing carbon dioxide emissions whilst helping to address global climate change through the more sustainable use of resources. Until such time that there is a change in national policy biomass is regarded as a renewable source of energy production. The principle of such developments is, therefore, accepted.

8.5 **ii) Heat Capture**

The Government's strategy for Combined Heat and Power (CHP) is described in NPS EN1, which sets out the requirements on applicants either to include CHP or present evidence in the application that the possibilities for CHP have been fully explored.

8.6 NPS EN3 states, at paragraph 2.5.27, that *'given the importance which Government attaches to CHP, for the reasons set out in EN1, if an application does not demonstrate that CHP has been considered the IPC should seek further information from the applicant. The IPC should not give development consent unless it is satisfied that the applicant has provided appropriate evidence that CHP is included or that the opportunities for CHP have been fully explored'*. For non-CHP stations, the IPC may also require that developers ensure that their stations are configured to allow heat supply at a later date (as described in paragraph 4.6.8 of EN1).

8.7 The promoter has confirmed that they will set up a Community Interest Company to progress investigations into the development of a district heating system. If a commercially viable scheme can be designed and funded they will provide heat from the scheme on a commercial basis.

8.8 Whilst the Further Technical Consultation Document (May 2012) discusses the capture of steam and/or hot water pass outs it makes no commitment to delivering a scheme, instead choosing to make the plant capable of a connection in due course should a feasibility study dictate that this would be possible. This is not considered to be acceptable, as this feasibility study may conclude that the heat cannot be captured easily. Without a firm scheme in place to capture this heat the project would miss a key opportunity for improving its sustainability.

8.9 The Council's current position is as presented during the discussions into the

Hampshire Minerals and Waste Plan (Submission, Nov 2011). It has been recommended that energy recovery development should wherever practicable, provide CHP from the start, but as a minimum an electricity supply to serve local communities with the capability to supply CHP should be provided.

8.10 **iii) Carbon Capture Readiness (CCR)**

The Government's policy and criteria on CCR relates to new combustion generating stations with a generating capacity at or over 300MW (as set out in Section 4.7 of EN1). The proposed biomass would generate a capacity of only 100MW and is, therefore, not triggered by these requirements.

8.11 **Recommendation – Principle of Biomass**

**No objection to the principle of biomass as a renewable energy source. The project would directly contribute to meeting the Government's objective of reducing carbon emissions and thereby help address the issue of global climate change. Further details of Helius Energy Plc's own 'Corporate Sustainability Strategy', as identified at paragraph 3.8.1 of the technical submission, are requested. An objection will be lodged in the event that the application is not supported by the results of a feasibility study for heat capture (currently programmed for post decision) and does not include specific details for the reuse of steam and hot water pass outs.**

9.0 **PRINCIPLE OF DEVELOPMENT ON OPERATIONAL PORT LAND**

9.1 Policy CS9 of the Council's adopted Core Strategy seeks to protect and facilitate further growth of the City's operational Port. The policy explains that applications for non-port related activity will be refused planning permission.

9.2 The use of the City's deepwater operational Port to take delivery of biomass material to serve the proposed plant is, in principle, a good one. This has the advantage of removing road-based traffic and makes good use of the existing port.

9.3 Due to cost considerations the majority of electricity generation projects need to be located close to existing grid infrastructure with the capacity to accept the proposed generation capacity. Operational ports are, therefore, a preferred location for the larger biomass-fuelled power plant.

9.4 A decision is needed as to whether the delivery of 62.5% (a minimum of 500,000 tonnes of the 800,000 total) of biomass fuel by sea is sufficient for the proposal to comply with Policy CS9. The advice from Planning Policy is that this level of delivery is acceptable and meets the spirit of the policy providing the Development Consent Order stipulates this level of activity, with annual monitoring built in to ensure compliance.

9.5 That said, whilst the Port is recognised as a good location for this type of activity there is very little justification provided by the promoter, other than one of commercial viability, as to why a power plant of the size proposed is necessary. A smaller scheme would inevitably have less impact. It is also noted that the Government's EN3 confirms at paragraph 2.5.17 that '*Commercial issues are not likely to be an important matter for IPC decision-making*', although in reality viability has to be a material consideration.

9.6 **Recommendation – Biomass Plant on Operational Port**

**No objection to the principle of a biomass development on operational port land providing at least 60-65% of the biomass material is delivered to the site by sea. Whilst no objection is raised to the principle of development further justification is required with regard to the proposed size of the operation and the choice of locations within the Port where other less sensitive locations may be possible.**

**Furthermore, it is considered that the promoter cannot claim to be totally committed to being a sustainable business if they are to use non-renewable sources to heat their on-site office space (as indicated at paragraph 3.12.20 of the technical submission) and do not commit to BREEAM or another measure for sustainable building. This should be revisited. It is also unclear how the other 'ancillary' operations will be powered.**

10.0 **AIR QUALITY & EMISSIONS**

10.1 The type of emissions associated with the type of plant proposed include:

- i) Airborne Emissions
- ii) Emissions to Watercourses
- iii) Ash
- iv) Dust
- v) Odour

10.2 **i) Airborne Emissions**

All processes that involve combustion, gasification or pyrolysis give rise to emissions to the air. It is therefore important to consider stack emissions produced by a biomass power plant in the existing environmental context. At the local level, this means comparing them with other sources of emissions and with current air quality. In the broader context, it means comparing the stack emissions from a biomass electricity generating plant with those from a power station fuelled by coal, oil or gas. Emissions to air would be the subject of specific authorisation under the Environmental Permit Procedures during the operation of the plant. This is enforced by the Environment Agency.

10.3 Emissions from biomass fuel combustion include limited quantities of gaseous nitrogen and sulphurous oxides and carbon dioxide. Emissions of nitrogen and sulphurous oxides are significantly less than those from

comparable fossil fuel stations. Flue gas is discharged from the plant via a chimney. Under certain conditions (particularly in cold weather) a steam plume may emanate from the chimney. This is non-polluting, the only consideration being the visual effect.

10.4 Biomass fuel combustion may also give rise to particulate emissions from the chimney, known as 'fly ash'.

10.5 A computer programme (ADMS) was used by the promoter to model the dispersion of emissions from the stack in the lower levels of the atmosphere in order to predict the impact on air quality. The Millbrook Road Air Quality Management Area (AQMA) is located approximately 200 metres north of the proposed site. The Council's Air Quality Action Plan states that the main source of pollution in the city's AQMAs is from road traffic and as such, the Action Plan seeks to integrate with the Local Transport Plan policies which include a package of measures to contribute to reducing road traffic emissions and congestion across the city of Southampton. The promoter's Report concludes that the construction and operation of the plant would have no significant effect on the existing air quality of the area and no implications for human health. It states that 'with a stack height of 90 metres, the impact on the adjacent AQMA 7 is 1% of the Air Quality Objective and is therefore considered negligible' (paragraph 7.9.2 refers). This does not take account of the road-borne traffic generated.

10.6 Furthermore, atmospheric pollution is highlighted as an area of concern within the Habitats Regulations Assessment for the City Centre Action Plan Preferred Approach (Jan 2012). Transport emissions are highlighted as a key source of air pollution and suggested mitigation includes reducing traffic levels. With deliveries by road it will be important that any Development Consent Order is limited to an agreed maximum level of traffic.

10.7 **ii) Emissions to Watercourses**

The Environment Agency (EA) has responsibility for the control of water quality, water abstraction and all emissions. No impact is expected.

10.8 **iii) Ash**

The main solid bi-product of the conversion of biomass into energy is ash, usually termed 'bottom ash'. Bottom ash is produced at a rate of around 1 per cent of the total weight of the biomass burned. The ash from most fuels can be safely returned to the soil as a fertiliser.

10.9 **iv) Dust**

Emissions of dust may occur from the site as a consequence of construction activities. The potential for dust will be dependent on the type of construction activity, prevailing wind speed and relative location of receptors to wind

direction.

- 10.10 In order to reduce the potential for dust from operational activities the scheme will incorporate dedicated areas for the unloading of biomass feedstock to the site. Biomass feedstock unloaded from vessels will be transferred to an enclosed conveyor where it will be taken direct to the biomass storage building.
- 10.11 **v) Odour**  
The NPS EN3 states that *'the IPC should satisfy itself that the proposal sets out appropriate measures to minimise impacts on local amenity from odour, insect and vermin infestation'* (paragraph 2.5.61 refers).
- 10.12 Odour emissions during operation could potentially arise from the temporary storage of biomass in the biomass storage building. All buildings containing biomass feedstock would have a small negative pressure. This would preclude odours being emitted from these buildings.
- 10.13 **Environmental Health Officer (EHO) Response**  
On the issue of air quality the Council's EHO comments that emissions to air caused by the plant would be subject to specific authorisation under the Environmental Permit Procedures. The proposed plant cannot operate without a permit issued by the Environment Agency.
- 10.14 The subject site is situated in the proximity of two current Air Quality Management Areas (AQMA) due to excessive concentrations of nitrogen dioxide caused mainly by road traffic emissions.
- 10.15 The Council has commissioned a study to identify and assess Low Emission Zone (LEZ) options for the area. Failure to comply with certain standards may result in a financial penalty imposed by DEFRA. The air quality issues on the Western Approach must be considered in this context
- 10.16 The information submitted indicates that an air quality assessment for the proposal has been undertaken but details relating the methodology and outputs have not been provided. In the absence of this information the EHO is unable to evaluate the assessment to determine if it is sufficient and appropriate. Unless this information is supplied prior to or supporting any application this department would recommend an objection to that application on the grounds of insufficient data.
- 10.17 The information submitted concludes that a 90 metre stack provides sufficient mitigation against any negative impact on local air quality. The EHO anticipates that additional stack height (above the proposed 90m) could decrease NO<sub>2</sub> emissions in the AQMA further, possibly by as much as 50% for a 10m increase. The Council has a statutory duty to improve air quality in the designated AQMA and can be fined for not doing so. Efforts to decrease NO<sub>2</sub> levels by as little as 0.4 ug/m<sup>3</sup> would incur considerable costs to the



Council and businesses. Therefore, it is appropriate for the developers to demonstrate that they have made reasonable efforts to identify how it might be practical to reduce levels beyond the 1% quoted. It is appreciated that other factors, including costs, would need to be considered in this assessment. The EHO would anticipate any submission supporting an application should demonstrate that the stack height has been selected given full consideration to the benefits to local air quality and feasibility. Otherwise it would recommend that Southampton City Council object to that application on the grounds of insufficient information and failure to demonstrate that air quality impacts on the AQMA have been minimised as far as is practicable.

10.18 **Recommendation – Air Quality and Emissions**

**Objection raised as insufficient detail has been submitted for the LPA to properly assess the scheme’s impact on air quality issues; including a failure to demonstrate that air quality impacts on the Air Quality Management Area have been minimised as far as practicable. Furthermore there will need to be an enforceable restriction on the level of biomass to be delivered by road, a stronger commitment in the application to the recovery and recycling of fly ash, and the submission of a Health Impact Assessment as required by Core Strategy Policy CS10 to clearly demonstrate the impacts of the finalised proposal on the City’s health before this objection can be removed.**

11.0 **LANDSCAPE & VISUAL EFFECTS**

11.1 Section 4.5 of NPS EN1 sets out the principles of good design that should be applied to all energy infrastructure. The NPS EN3 advises NID that they *‘should be satisfied that the design of the proposed generating station is of appropriate quality and minimises adverse effects on the landscape character and quality’* (paragraph 2.5.47 refers). Paragraph 2.5.50 adds that *‘good design that contributes positively to the character and quality of the area will go some way to mitigate adverse landscape/visual effects. Development proposals should consider the design of the generating station, including the materials to be used in the context of the local landscape’*.

11.2 With this in mind, and as required by National Planning Statement EN1, the promoter has prepared photographs and photomontages of the proposals to a verifiable standard using an accepted methodology. A total of 21 viewpoints (close, medium and distant) have been produced in consultation with the Council’s City Design Manager, and are supported by a scale model as previously requested by the Planning Panel. These images will form part of the presentation to the Planning & Rights of Way Panel.

11.3 The promoter’s technical submission notes that the Freemantle and Millbrook residential areas are the most significant sensitive visual receptors since the streets rise up a gentle slope facing the port. The closest properties are located approximately 250 metres to the north-east, separated by approximately 160 metres of operational port land, currently used as an

external storage area for cars and bulk cargoes, overhead transmission lines and towers, a multi-track railway, a rail freightliner terminal and the A33.

11.4 There are several major infrastructural facilities along the western shore of Southampton Water, opposite the site, including the Marchwood Incinerator (up to 77 metres tall) and Marchwood Power Station (up to 80 metres tall). Further south the skyline in many views is dominated by the chimneys of Fawley Power Station (up to 198 metres tall) and Fawley Oil Refinery.

11.5 By way of comparison of building heights the following table provides a local context against which the proposed submission can be assessed:

<b>Building</b>	<b>Approximate Height</b>
Marchwood Power Station	80m
Marchwood Incinerator	77m
Pylons close to the site	40m
Mobile dockside cranes (in upright position)	33m
Large gantry cranes at DPWCT (with boom raised)	117m
Redbridge Towers	58m
Shirley Towers	46m
Millbrook Towers	73m
Fawley Power Station Stack	198m

11.6 The promoter's technical submission concludes that *'the amended Primary Development Area within the Port is considered to be the most acceptable location for the proposed development in terms of minimising visual impact, which is considered to be negative but of moderate to minor significance. The proposed development will have a negligible impact on the landscape character of the Port which is already industrial. The proposed development is therefore considered to be acceptable in terms of its landscape and visual impacts'* (paragraph 8.7.13 refers).

11.7 It is agreed that whilst the plant will sit within an existing port context there will be a significant change to the City Centre approach from the west, and that due to the magnitude of change predicted in close-up views, the receptors that receive the most significant impacts are those located within 500 metres of the site. These are concentrated to the north and east of the application site along the A33 and in the neighbouring residential areas of Millbrook and Freemantle.

11.8 The promoter has suggested that the most effective form of mitigation of impacts in these views will be to plant individual trees close to the receptors with the function of specifically screening views from these locations to the proposed development. They also suggest that there may be opportunities to plant individual trees in the verges and footways beside the A33 as it passes the application site. No further details are provided and there is no certainty that the proposed planting can be accommodated given the nature of the highway surrounding the site and its associated servicing.

- 11.9 This will not provide sufficient mitigation in our opinion and it is difficult to argue with the applicants own conclusion (at paragraph 8.9.3 of the Further Technical Consultation Document) that *'due to its height and scale, and its location in the wide open landscape of the River Test Estuary, elements of the proposed development will be visible to a wide range of receptors at varying distances. In views from closer than 1 kilometre, receptor sensitivity is reduced, due largely to the presence of the existing docks in views. In these close-up views, the large scale of the development gives rise to high magnitudes of change, resulting in moderate and major negative visual impacts from the nearby residential areas of Freemantle and Millbrook and from the road and rail routes into Southampton'*.
- 11.10 **Consideration of 3 Proposed Options – City Design Manager Response**  
The formal comments of the Council's City Design Manager are attached to this report at **Appendix 8**. A formal objection is lodged which is supported by the Council's Architect's Panel who also consider that there is a fundamental problem with a cosmetic dressing-up exercise of an industrial process as is the case with the current proposals. An assessment of the plant at night, to show the proposed lighting, is also missing from the current submission.
- 11.11 **Recommendation – Landscape & Visual Effect**  
**The relocation of the Primary Development Area further away from the nearest residential neighbours with the clear improvements to the Foundry Lane viewpoint are noted. The proposed options are, however, not acceptable on the grounds of being of inappropriate scale, massing, height, poor architectural and landscape quality. It is the opinion of the City Council that they will have a negative visual impact on local amenity and the skyline of the city for the reasons given by the Council's City Design Manager in the response dated 3<sup>rd</sup> July 2012. An assessment of the plant at night, to show the proposed lighting, is also missing from the current submission. An objection will be submitted in the event that a formal application for these current proposals is lodged. It is the Council's opinion that the need for the development does not outweigh the harm that would be caused by its implementation as currently proposed.**
- 12.0 **ECOLOGY**
- 12.1 The site is mostly of concrete or tarmac hard-standing with limited vegetation, of which none is of any conservation significance. The potential for protected species to be present is also negligible. The site is not subject to any nature conservation designations nor is it adjacent to an area with any such designations. However, there are sites with both statutory and non-statutory designations of relevance in the potential zone of influence. Internationally designated sites for nature conservation within 10 kilometres of the project include the Solent & Southampton Water SPA and Ramsar site, the Solent Maritime SAC, the New Forest SPA, SAC & Ramsar site, the River Itchen SAC and the Emer Bog SAC. They include a number of component SSSIs.

- 12.2 As predicted construction noise levels generated within the primary development area are limited the valued birds feeding and roosting in designated areas are considered sufficiently distant to not be adversely affected.
- 12.3 Migrating fish including Atlantic Salmon are unlikely to be affected should vibro-piling techniques be used for preparing foundations since the River Test is at least 150 metres from the primary development area boundary.
- 12.4 Predicted noise levels generated by the plant during operation will not exceed 55 dB LAeq,1hr at Southampton Water. This is not significantly above existing background levels therefore, it is considered that there will be no adverse effect on over wintering birds feeding and roosting over 1,000 metres distant.
- 12.5 The Council's Ecologist shares the conclusions of the promoter but notes that the impact of vehicle emissions on nearby European sites appears to have been dismissed with little consideration. In particular, there has been no assessment of the potential for impacts in combination with traffic likely to be generated by a number of other significant developments in the same area of the city, for example the Lidl Distribution Centre (*pending consideration at the time of writing*). Atmospheric pollution is highlighted as an area of concern within the Habitats Regulations Assessment for the City Centre Action Plan - Preferred Approach (Jan 2012). Transport emissions are highlighted as a key source of air pollution and suggested mitigation includes reducing traffic levels. It is clear that some biomass fuel will be brought in by road; if further assessment is unlikely it may be appropriate to consider further limiting the number of weekly HGV movements.
- 12.6 **Recommendation - Ecology**  
**No objection to the scheme's impact on ecology subject to the support of Natural England being given to the proposal, either a further assessment of cumulative vehicle emissions on the European sites or a limit on the level of road based deliveries, and the mitigation outlined in the Further Technical Consultation Document (May 2012) being submitted and implemented.**
- 13.0 **HISTORIC ENVIRONMENT**
- 13.1 There are eight Listed Buildings within the promoter's wider study area; with the King George V Dry Dock and pumping station grade II listed building being within the application site itself. No physical impacts are proposed on these structures.
- 13.2 The Council's Heritage Team have raised no objections to the proposal. The archaeological mitigation measures outlined in the technical submission should be adequate to mitigate any potential archaeological impact from the development.

13.3 **Recommendation – Historic Environment**  
**No objection to the scheme’s impact on local heritage subject to the mitigation outlined in the Further Technical Consultation Document (May 2012) being submitted and implemented.**

14.0 **GEOTECHNICAL AND GEO-ENVIRONMENTAL**

14.1 The Council’s Contaminated Land Officer has commented that records indicate that the subject site is situated on the following current/historical land uses;

- cable works (on site)
- automotive manufacture works (on site)
- saw mill (on site)
- Reclaimed land (on site)

This indicates that there is significant likelihood that significant land contamination might have affected the land associated with the development proposal. The potential contamination sources recognised above would be considered significant enough to present a risk to this development and/or the wider environment during and after construction.

14.2 The submission states that contamination was identified and remedial actions were undertaken to the satisfaction of the Environment Agency. The Council has not been provided with the details of these investigations or remedial actions and is therefore unable to form its own opinion. Unless this information is supplied prior to or supporting any application an objection will be raised to the application on the grounds of insufficient data.

14.3 **Recommendation – Geotechnical and Geo-environmental**  
**Objection raised as insufficient detail has been submitted for the LPA to properly assess the scheme’s impact on geotechnical and geo-environmental issues.**

15.0 **FLOODING & SITE DRAINAGE**

15.1 There are two watercourses in close proximity to the site: The River Test and the Blighmont Crescent Stream. The site lies within Flood Zone 3 and has a high probability of flooding. Flood defences in the vicinity of the site are owned either by the Environment Agency, the Local Authority or ABP.

15.2 A Flood Risk Assessment (FRA) has been prepared in accordance with the requirements of the NPS EN1. The following sources of flooding are identified as being potentially significant for the proposed development site:

- Fluvial (rivers) – from the Blighmont Crescent Stream;
- Tidal – from the River Test/Southampton Water;
- Pluvial (overland) – from the residential area to the north; and
- Sewers – from the sewers beneath the A33

15.3 The proposed development will incorporate the following flood risk management measures:

- Building finished floor levels will be set at least 150mm above adjacent

- ground levels;
  - Critical plant and safe refuge areas will be located above the maximum flood level;
  - The external finished ground profile will be designed to slope away from buildings wherever possible;
  - Buildings will include flood resilient or resistant features and finishes; and,
  - The proposed development will be registered with the Environment Agency Flood Warnings Direct service.
- 15.4 The Council's Sustainability (Special Projects) Officer has confirmed that the consultation document sets out a sound approach to the assessment of flood risk. The documents refer to the flood and coastal erosion risk management policies set out in the North Solent Shoreline Management Plan. Reference should also be made to the policy options contained in the emerging Southampton City (Redbridge to Woodmill Lane) Coastal Flood & Erosion Risk Management Strategy. No objection on this issue is raised.
- 15.5 **Recommendation – Flooding and Site Drainage**  
**No objection raised to the scheme's impact on flooding and drainage issues subject to a feasibility study being submitted with the application into the potential use of Sustainable Drainage Measures, the support of the Environment Agency and Southern Water being given to the proposals, and the mitigation outlined in the Further Technical Consultation Document (May 2012) being submitted and implemented. Reference should be made in any formal submission to the policy options contained in the emerging Southampton City (Redbridge to Woodmill Lane) Coastal Flood & Erosion Risk Management Strategy.**
- 16.0 **HIGHWAYS & MOVEMENT**
- 16.1 **i) Construction Phase**  
The total construction period for the project is currently 36 months. In terms of HGVs, the maximum number of vehicles are anticipated across months 4-6 with an average of 40 HGVs (80 trips) and a maximum on any single day across this period of 50 HGVs (100 trips) expected. The plant is due to be operational in 2017.
- 16.2 In addition to HGV trips it is anticipated that on-site construction workers will vary in number, between 53–450 at the peak of construction. It will be the intention of the developer that the contractor appointed will utilise minibuses to transport staff in order to minimise the number of vehicles accessing the site and using the local and trunk road networks. Assuming a minimum minibus seat capacity of 7 seats this equates to a maximum of 65 minibuses (130 trips).
- 16.3 Based on the above HGV and staff arrivals / departures the maximum number of vehicles accessing the site across any hour equates to a maximum of 73 vehicles or 146 trips.

16.4 **ii) Operational**

The assessment of the effect of vehicles during the operational phase of the development has been based on the assumption of the worst case transport of fuel by road of up to 200,000 tonnes per annum. It is anticipated that a single HGV can carry 25 tonnes of biomass. The site can be expected to receive up to 27 HGVs per day (with no deliveries Saturday afternoon or Sundays) or approximately 3 per hour. All trips, including staff movements, equate to approximately 122 per day.

16.5 The Council's Highways Officer has commented that, as the site is bordered by railway sidings, this is a mode of transport which should be considered as a positive solution to reducing the potential additional trips on the network, and this should be explored by the applicant. The applicant must explore the rail option more fully to gain the Council's support, especially should the fuel supply not arrive as predicted. The penalties involved should be sufficient to ensure the operator has an interest in finding viable alternatives.

16.6 The data provided within the report does not help to give a clear picture of the impact on the highway network. Clarification and clearly presented information would help the understanding of the impact of this development. A mechanism needs to be put in place to ensure that the fuel does arrive by sea, and that the waste by-product is removed by non-road based transport. There must be an agreed strategy to ensure that the minimum amount of road transport is used, and a robust, transparent monitoring system is required to give clear information on the quantities of fuel arriving on site by the various modes of transport. A condition is essential to embody this requirement and a suitable penalty imposed to give incentive to minimise road transport.

16.7 The suggested transport management plan would need to be approved prior to the commencement of development, and the travel plan mentioned in the same section would need to be agreed prior to implementation (with regular review and updating).

16.8 **Recommendation – Highways & Movement**

**Clarification is required on the exact impacts to the City's road network as a consequence of 200,000 tonnes of biomass being delivered by road. An objection will be lodged in the event that the local rail network is simply dismissed as a suitable way of delivering biomass to site and removing the ash. This should be explored further as a solution for reducing HGV trips on the local highway network that add to the poor air quality issues identified in the submission to date. Further details of the mechanism for monitoring the quantities delivered by different modes are also required.**

17.0 **NOISE & VIBRATION**

17.1 **i) Construction Noise**

It is proposed that construction works will take place between 07:00 and 20:00 hours (Monday to Friday) and between 07:00 and 13:00 hours on Saturdays. These exceeds the Council's normal practices in close proximity to residential neighbours but should be viewed in the context of the site's current unrestricted operational port status.

17.2 **ii) Operational Noise**

The promoter's assessment suggests that the noise impact from biomass deliveries to the nearest residential neighbours will not be significant. The Council's Environmental Health Officer (EHO) accepts the scope of the assessment, but suggests that the report lacks sufficient data to assess the application properly. During the aborted application last time, comments were made by an objector, which the EHO agreed with, that there was insufficient information to overcome the concerns raised and this position has not changed. Typical levels have been used to compare with the noise from the application site, whereas if the minimum noise level is used, for example at Lakeland drive, this will result in a significant difference in noise level, indicating that complaints will be likely. More detail in the data would help to form a proper assessment of this noise impact. In the experience of the EHO, the EA does not put noise limits on permits, preferring to ask for noise plans. Without the base line data, the EHO is not in a position to properly assess this application, and would object to the application on the grounds of insufficient data.

17.3 **iii) Vibration**

The promoter's technical submission concludes that *'calculations of the vibration level from piling work indicate that there will be no significant effect at the nearest residential receptors. The increase in noise level from construction-related road traffic movements will also be negligible'* (Paragraph 15.6.2 refers).

17.4 **Recommendation – Noise & Vibration**

**Objection raised as insufficient detail has been submitted for the LPA to properly assess the scheme's impact on noise issues.**

18.0 **DAYLIGHT & SUNLIGHT IMPACTS**

18.1 Local Plan 'saved' Policy SDP1 (Quality of Development) states that development will only be permitted if it maintains or enhances the general amenity of the area. The quality of life of neighbouring occupiers should not be harmed by new development through overshadowing and the loss of privacy or visual amenity.

18.2 Potential impacts on daylight, sunlight and overshadowing have been assessed with respect to relevant target criteria set out in the Building Research Establishment (BRE) guidelines. The properties identified as sensitive receptors are 257-305 Millbrook Road, Sycamore Lodge on Paynes Road and 149 Paynes Road.



- 18.3 It is considered by officers that the impact of the daylight on these properties will be negligible given the separation distances involved.
- 18.4 As all of the rooms with site facing windows are BRE compliant with regard to sunlight it is considered by officers that the overall impact of the proposed development is seen as negligible.
- 18.5 The overshadowing assessment indicates that there will be no additional overshadowing to the front gardens of 157-305 Millbrook Road, Sycamore Lodge or 149 Paynes Road throughout the day on the 21st of June or March. In December there will be brief periods of additional overshadowing to these gardens. These instances occur between 14.00 and 15.00 and do not shadow any one point for more than 30 minutes. These brief instances of shadow are will not have a significant effect on the enjoyment of these spaces by the residents. Overall, the impact of shadow on the amenity areas surrounding the site is considered by officers to be negligible.
- 18.6 **Recommendation – Daylight & Sunlight**  
**No objection to the scheme’s impact on daylight, sunlight or overshadowing given the proposed re-siting of the development.**
- 19.0 **SOCIAL & ECONOMIC EFFECTS**
- 19.1 It is anticipated that in the short term, during the construction period, there would be a positive economic impact for the locality in terms of demand for construction workers and related support services and supplies. This is also likely to feed through into requirements for civil engineering and building skills, welding and mechanical and electrical installation skills.
- 19.2 In the longer term, during the operational phase of the development, it is anticipated that the project would have a positive economic effect. The scheme would offer a range of jobs with the majority potentially being filled by local placements through a training and employment skills plan in accordance with Core Strategy Policy CS24.
- 19.3 **Recommendation – Socio-Economic Impacts**  
**The job creation proposed both during and post construction is noted. No objection to the scheme’s social or economic impacts subject to the agreement of an Employment and Skills Training Plan as outlined in the Further Technical Consultation Document (May 2012). The lack of any direct community benefits for the residents of Freemantle and Millbrook is disappointing.**
- 20.0 **HAZARDOUS INSTALLATIONS**
- 20.1 The proposed development is within the consultation distances of Usbourne Fertilisers and ABP Explosives site and the Health and Safety Executive (HSE) provides advice on proposed developments. The Council’s

Emergency Planning & Business Continuity Manager has commented that recent events within the Port would suggest a site specific emergency response plan may be of benefit given the sheer size and scale of the potential operation. This echoes the concerns raised by the Planning & Rights of Way Panel when it considered the promoter's Statement of Community Consultation. That said, it is considered that the risk of an unexpected fire is low and can be mitigated by appropriate design measures incorporated into the design of the buildings, structures and control systems.

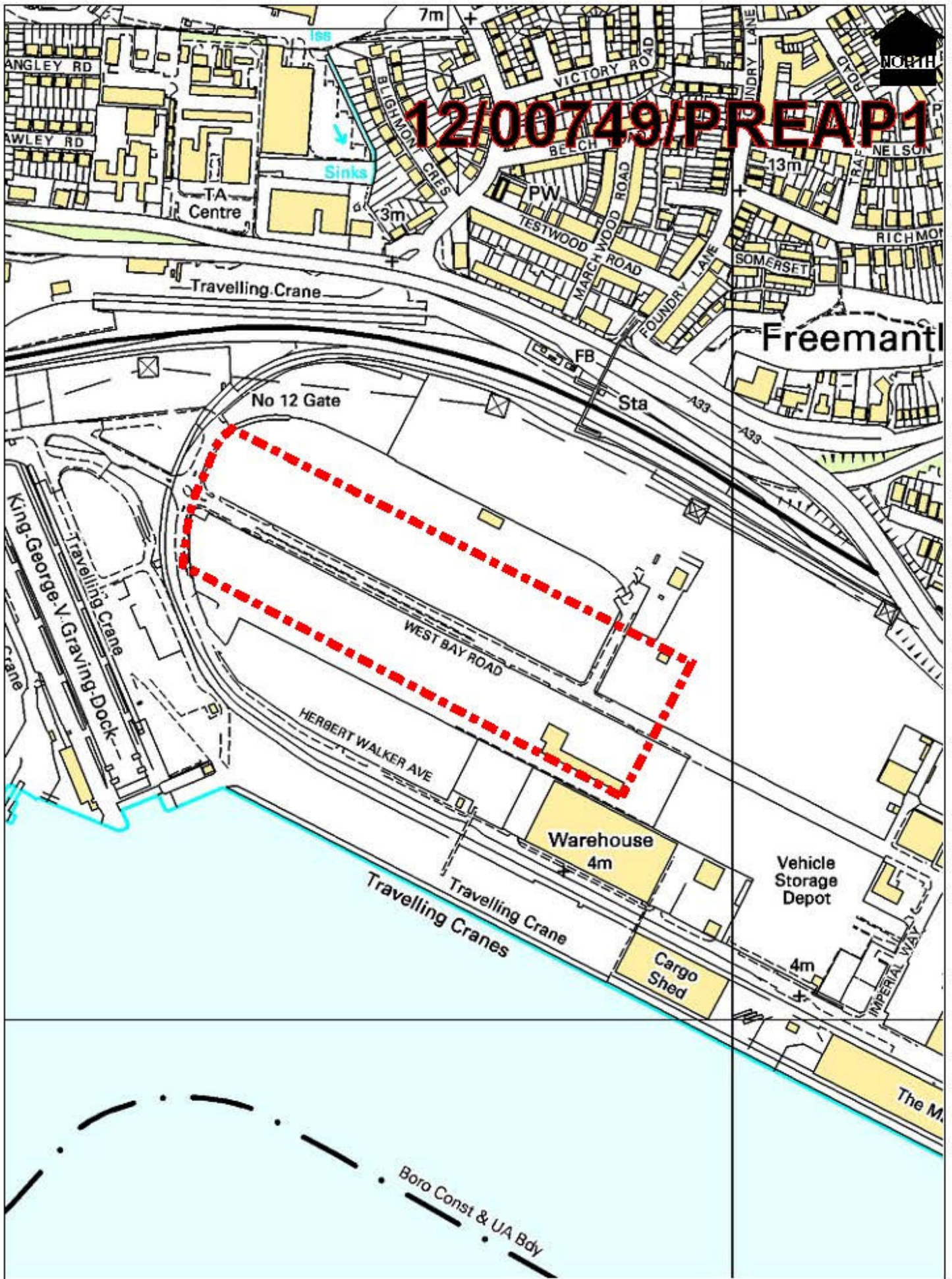
- 20.2 **Recommendation – Hazardous Installation Implications**  
**No objection to the scheme's impact as a hazardous installation subject to no objection being received from the HSE to the proposal, and the submission and approval of a Site Specific Emergency Response Plan in consultation with the Council's Emergency Planning & Business Continuity Manager.**
- 21.0 **OTHER ENVIRONMENTAL ISSUES**
- 21.1 The Further Technical Consultation Document (May 2012) also considers the proposals' impact on the flight path to Southampton Airport, the effect on local electromagnetic fields, the greenhouse gas emissions, and local TV reception.
- 21.2 The proposed site for the generating station is located approximately 7 kilometres southwest of Southampton Airport. The BAA have been consulted by the promoter.
- 21.3 The promoter's technical submission confirms that the worst case likely cumulative electromagnetic field (EMF) levels due to proposed Southampton Biomass Power plant electrical equipment will have a negligible environmental impact upon the closest public accessible locations around the site perimeter.
- 21.4 EU requirements under the Renewable Energy Directive (2009 2009/28/EC) for biomass fuelled electricity and heat generation projects require plants to achieve at least 35% greenhouse gas (GHG) emissions savings (rising to 50% in 2017 and 60% in 2018 for new installations) compared to the average of the EU's fossil fuel energy mix. The results of the modelling indicate that the proposed scheme will achieve GHG emissions savings of up to 83% when compared against EU's fossil fuel comparator, thereby exceeding the Renewable Energy Directive target of 60% savings. This will be considered further by NID when it comes to determine any formal application.
- 21.5 Finally, the promoter will undertake a 'before' and 'after' development survey to determine whether there is any significant deterioration of TV signal strength, and whether it is directly attributable to the development. If any significant reduction in signal strength or quality is found due to the development, the promoter will fund appropriate mitigation measures.

- 21.6 **Recommendation – Other Environmental Issues**  
**No objection to the scheme’s impact as the other environmental issues listed in the Further Technical Consultation Document (May 2012) subject to no objection being received from the BAA to the proposal.**

**Appendices**

1.	Site Location Plan
2.	Nationally Significant Infrastructure Projects Procedure Note
3.	Summary of Officer Recommendations
4.	Standard Response Objection Letter
5.	Building Heights (Previous & Proposed)
6.	SCC Consultation Leaflet
7.	Planning Policy Context
8.	City Design Manager comments

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