# **Summary of Officers' Recommendations:**

#### **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.

### 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.

### **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.

### 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.

### **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.

### **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.

#### 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.

### 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.

### **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.

#### **Recommendation – Noise & Vibration**

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

# Recommendation - Daylight & Sunlight

No objection to the scheme's impact on daylight, sunlight or overshadowing given the proposed re-siting of the development.

# **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.

# 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.

### 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.