

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/03056	Your Ref:	APP/20/00833
EH Case Officer Extn:	446677	Date:	04 November 2020
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/20/00833		
Site Address:	Havant Lorry Park, Southmoor Lane, Havant, PO9 1JW		
Proposed Development:	Erection of a flexible power generation facility with associated ancillary infrastructure, access and boundary treatment		

Observations / Comments:

I have reviewed the application and would like to provide some comments on the potential for contamination / pollution, and in respect of air quality. Comments here are made without prejudice to those of my Environmental Health colleagues in respect of noise / light (anticipated under separate cover).

Contaminated Land Risks

The proposed development is not particularly sensitive to contamination – it is not expected that ground conditions are likely to present a significant risk to buried services & infrastructure required as part of the development.

The scheme includes 2 x 5600L lubrication oil tanks & associated distribution pipework. It is not clear from the application documents that the storage tanks will be of bunded type, or that they will be provided with adequate collision protection.

The nearest controlled water (Brockhampton Stream, 110m) discharges to harbour waters with European habitats designations (i.e. a particularly sensitive receiving environment), and the nearest public surface water drainage communicates directly with the harbour. Oil spills at this site could have significant acute environmental impact.

I raise no objection to the plans (or to the lack of clarity in respect of pollution prevention) based on an assumption that the applicant will observe their obligations under The Control of Pollution (Oil Storage) (England) Regulations 2001 SI 2954.

Air Quality

Comments here relate largely to the Redmore Environmental Air Quality Assessment Ref: 3815-3r2 dated 12th August 2020.

Air Quality – Impacts for Human Receptors

I note that the human health criteria assessment did not specifically identify & consider the

nearest residential receptors at Brookside Road (~120m). The modelling array included this area. These properties fall within the NO₂ zone corresponding to 27-27.5 µg/m³ annualised, against an annual limit value of 40 µg/m³. Given that the receptors here have not been specifically modelled, it is not possible to determine the likely significance of the estimated process contribution, so it is difficult to determine whether the result is significant in planning terms (or not).

I would also highlight that the Brookside Road receptors also fall within a +1 µg/m³ (annual) contour estimated in the air quality assessment for the 20MW Green Frog Gas STOR facility on the north side of Harts Farm Way, and that the properties will in addition be within the prevailing dispersion plume associated with the 5.3 MW gas engine at Budds Farm, 20MW Diesel STOR on land north of Harts Farm Way, and the industrial biomass boiler at plot 2 Hermitage Park. None of these local sources has been specifically accounted for within the assessment, and it is questionable whether the use of HBC sample location 7B as a background benchmark is sufficiently representative of the cumulative impacts of combustion processes at Brookside Road.

These sources are also relevant (are arguably more relevant-) to the consideration of the short term limit values (200 µg/m³ hourly average, <19 occasions/annum), as all STOR facilities serve the same need, and are not unlikely to be called upon simultaneously, increasing risks of short term exceedances.

Whilst I would recognise that the proposed development is of relatively small scale against the existing facilities, I would nevertheless caution that there is a risk from aggregated emissions from combustion sources in this local area, given the factors driving the siting of such facilities in this location (namely, suitability of the gas supply). This may justify closer scrutiny of emissions from even relatively modest schemes in order for surety that national air quality limit values will not be exceeded at relevant locations. When the available air quality 'headroom' has been consumed by local emissions, there may be grounds for refusal under adopted policy DM10 or emerging policy E23.

It is a planning decision as to whether this uncertainty is material, but I would advise that it is not currently possible to determine likely magnitude of impact at the omitted residential properties, nor the cumulative impact against short term limit values.

Air Quality – Impacts for Ecological Receptors

Report paragraph 5.4.2, appears to include an error in stated results relative to the annual mean Environmental Quality Standard (EQS) of 30 µg/m³ and against the reported results at table 24. Table 24 indicated 4 no. exceedances (one additional relative to the text). High extant background concentrations are cited as the cause of exceedances (not the process contribution).

Paragraph 5.4.6 appears to contain a typographical error in respect of the standard quoted: it refers to the 30µg/m³ annual standard, should read 75 µg/m³. One exceedance is noted, at receptor E5, Mudflats. High Background levels is cited as the reason for exceedance. The overall conclusion presented is essentially that 'the process will negatively contribute to existing exceedances of EQS at ecological receptors, but process will not in & of itself 'cause' an exceedance where none currently exists'.

Further errors are noted at 5.4.8, both in standards quoted, and in reference to results presented at table 27. Most significantly, the results for receptor E5 as presented in table 27 appear to show both that the 24hr EQS would be exceeded, *and that the development would create an exceedance where previously there was none*. On this basis I would materially disagree with the conclusion presented in this paragraph, and would conclude instead that the result could be considered to be 'significant' against policy DM10. The ecological assessment similarly ignores the impacts of the other local sources not specifically accounted for within the

modelling (i.e. local energy facilities discussed in human health section above), and this could in principle reduce the estimated process contribution (associated with this development). Accounting for other local sources would likely increase the number of exceedances noted in absolute terms over the respective relevant averaging periods.

As above, it is a planning decision as to whether this result should be considered to be material, but I would advise that the views of the county ecologist &/or Natural England are sought as to the perceived significance of the highlighted significant result, and whether in consequence a formal objection may be appropriate under policy DM10 (or applicable ecological policy).

As above I would reiterate the caution in respect of aggregation of combustion sources in this locality.

Mr. Jonathan Driver
Environmental Control Officer