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|-----------------|---------------------------------------------------------------------------------------------------|---------------|-------------|
| Site Address:   | Farlington Redoubt, Portsdown Hill Road, Havant                                                   |               |             |
| Proposal:       | Change of use to allow third party operators to inject bio-methane into the existing gas network. |               |             |
| Application No: | APP/20/00077                                                                                      | Expiry Date:  | 27/03/2020  |
| Applicant:      | Southern Gas Network (SGN)                                                                        |               |             |
| Agent:          | Mr Brereton                                                                                       | Case Officer: | David Eaves |
|                 | Carter Jonas                                                                                      |               |             |
| Ward:           | Purbrook                                                                                          |               |             |

Recommendation: **GRANT PERMISSION**

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## **1 Site Description**

Farlington Redoubt, is a waste management site and Southern Gas facility set within a former quarry on Portsdown Hill and accessed from the northern side of Portsdown Hill Road.

## **2 Planning History**

01/54301/007 - County Matter Application to operate a Waste Transfer Station for skip waste generated from the Applicants Skip Hire Business., RNO,28/08/2001

00/54301/005 - Change of use of eastern part of site to lorry and container park with siting of four portacabins for ancillary office/staff use and four portacabins for ancillary storage, TPP,02/11/2000

00/63215/001 - Application for determination whether prior approval is required for installation of 3 x dual polar antennas and 2 x dishes to existing tower and provision of equipment cabin., PARP,04/10/2000

99/54301/003 - Change of use of eastern part of site to use for storage of motor vehicles plus siting there of portakabin for ancillary office/staff use., PERM,29/04/1999

99/54301/004 - Proposed additional 3 x dual polar antennas at 12 metres, 2 x 0.6 dishes for One 2 One Communications Limited, PARP,21/01/2000

97/54301/002 - Use of site as a vehicle recycling and secure storage depot with retail facility, REF,17/04/1997

96/54301/001 - Use of part of site as transport operating centre, siting of portacabin for use as office for private hire vehicles and erection of aerial, TPP,17/10/1996

03/54301/008 - Application for renewal of planning permission 00/54301/005 for use of eastern part of site for lorry and container park, with siting of four porta cabins for ancillary office/staff use and four porta cabins for ancillary storage., PERM,02/06/2003

03/54301/010 - County Matters application for the storage and processing of soil and secondary aggregate, vehicle parking and general storage of plant, machinery and

skips at Farlington redoubt, Portsdown Hill Road, Havant., PERM,28/04/2003

03/54301/009 - County Matters application for removal of Condition 2 of Planning Permission 01/54301/007 at Farlington Redoubt, Portsdown Hill Road, Havant., PERM,28/04/2003

03/54301/011 - Change of use from fire training area to pipe storage, creation of new vehicle access and future siting of mobile caravan for night guard., WD,12/03/2004

04/54301/012 - County Consultation to operate a concrete crusher as part of the Waste Transfer Activities., PERM,22/06/2004

05/54301/013 - Consultation by Hampshire County Council to continue to operate a concrete crusher as part of the Waste Transfer Station activities., RO,05/10/2005

05/54301/014 - County Matter application for variation of Condition 10 of permission 01/54301/007 (03/54301/009 and 03/54301/010) to allow waste to be brought to the site by Registered Waste Carriers., PERM,07/02/2006

09/54301/015 - Variation of Condition 9 of Planning Permission 05/54301/014 (to increase the quantity of waste to be handled at the site) at Farlington Redoubt, Portsdown Hill Road, Portsmouth, PO6 1BW., PERM,10/11/2009

APP/10/00141 - County Matter application for the provision of a waste management facility and ancillary cement silo., PERM,23/07/2010

GEN/15/00054 - Notification of intention to make installations changes including additions tot he existing electronic communications apparatus - PERMITTED DEVELOPMENT, ,30/01/2015

APP/15/00757 - County Matters Application to vary Condition 9 of Planning Permission 10/00141 (to increase permitted throughput)., RNO,05/08/2015

GEN/19/00544 - Pre-application submission for third part operators to inject bio-methane into the gas network at the Portsdown Hill bio-methane injection facility., ,25/10/2019 17:33:05

### **3 Proposal**

Change of use to allow third party operators to inject bio-methane into the existing gas network.

### **4 Policy Considerations**

National Planning Policy Framework  
Havant Borough Council Borough Design Guide SPD December 2011  
Havant Borough Council Parking SPD July 2016

#### **Havant Borough Local Plan (Core Strategy) March 2011**

- |      |                                                                                   |
|------|-----------------------------------------------------------------------------------|
| CS11 | (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) |
| CS16 | (High Quality Design)                                                             |
| CS17 | (Concentration and Distribution of Development within the Urban Areas)            |

|      |                                                                         |
|------|-------------------------------------------------------------------------|
| CS19 | (Effective Provision of Infrastructure)                                 |
| CS20 | (Transport and Access Strategy)                                         |
| DM10 | (Pollution)                                                             |
| DM12 | (Mitigating the Impacts of Travel)                                      |
| DM8  | (Conservation, Protection and Enhancement of Existing Natural Features) |

#### Havant Borough Local Plan (Allocations) July 2014

|      |                                                                  |
|------|------------------------------------------------------------------|
| DM20 | (Historic Assets)                                                |
| AL1  | (Presumption in Favour of Sustainable Development)               |
| AL2  | (Urban Area Boundaries and Undeveloped Gaps between Settlements) |

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

## **5 Statutory and Non Statutory Consultations**

### **Conservation Officer**

#### **Site**

The site comprises a gas work facility located in the footprint of a former 19<sup>th</sup> C defensive emplacement – Farlington redoubt. This was excavated after WWII to make way for a quarry. It has been a storage facility for gas since the 70's. The site is located to the east of Fort Purbrook which is listed as scheduled monument and is linked via a covered walkway which is included in the scheduling. There are other scheduled monuments in the nearby vicinity and also 2 no. listed buildings on Portsdown Hill Road.

The footprint of the former redoubt has been recorded by Hampshire County Council as a non-designated heritage asset due to its historic interest.

#### **Proposal**

The proposal is for a change of use of the site to allow third parties to use the gas facility. No physical structures are proposed, nor any changes to the existing built structures on the site.

#### **Legislative and Policy Context**

Given the location of the site adjacent to a scheduled monument and the local historic interest of the site, the following legislation is relevant.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The revised National Planning Policy Framework (NPPF) was published in February 2019 and sets down the policies that the Council must take into account when determining planning applications. The 'Historic Environment Good Practice Advice in Planning Note 2', states at paragraph 4:

'The significance of a heritage asset is the sum of its archaeological, architectural,

historic, and artistic interest and provides at paragraphs 8, 9 and 10 that in order for the Local Planning Authority to make decisions in line with legal requirements, the objectives of the development plan; and, the policy requirements of the NPPF, great importance is placed on understanding the nature, extent and level of the significance of the heritage asset.

The revised NPPF (February 2019) sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions in the following paragraphs:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal.

191. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

With regards to local planning policy, Policy CS11 of the Havant Borough Core Strategy 2011 states that planning permission will be granted for development that:

‘Protects and where appropriate enhances the borough’s statutory and non-statutory heritage designations by appropriately managing development in or adjacent to

conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest’.

Policy CP16 (1a) of the Core Strategy states ‘Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design: ‘Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site’.

Policy DM20 of the Allocations Plan 2014 states that development proposals must conserve and enhance the historic assets of Havant’.

### **Assessment**

The detailed Heritage Statement produced by Archaeology Collective, has thoroughly assessed the potential impact on the significance of adjacent and nearby heritage assets and concluded that there will be minimal impact to these heritage assets as a result of the change of use. I am minded to agree with the findings of this assessment and am satisfied that the proposal accords with the relevant national and local planning policies.

### **Conclusion**

No objection raised.

### **Countryside Access Team**

No comments received.

### **County Archaeologist, Strategic Environmental Delivery Group, HCC**

Thank you for your consultation. I would draw your attention to the file entitled HERITAGE STATEMENT that is included among the documentation attached to the above application on your website. This document concludes that the proposals will not involve any ground disturbance or changes to the outward dimensions of the facility and therefore will have no impact upon buried archaeological assets or upon the settings of the various Listed Buildings and Scheduled Monuments located in the immediate area.

I would concur with these conclusions and therefore I would not wish to raise any archaeological issues in this particular instance.

### **County Ecologist**

The application is accompanied by a Preliminary Ecological Appraisal (CT Ecology, January 2020). I am content that the site is of minimal ecological interest and that the proposal is not likely to result in an ecological impact. I do not consider that ecological mitigation or enhancements are required and there is essentially no location where meaningful measures could be provided in any case.

### **Environment Agency**

We have no objection to the proposal as submitted.

The site is located on a Principal Aquifer so would be regarded as an extremely sensitive locations.

If any oil storage is required associated with the boiler, than this must be placed above

ground. This is in line with our key groundwater guidance  
<https://www.gov.uk/government/publications/groundwater-protection-position-statements>.

### **Environmental Health**

No adverse comments to make.

### **Forestry Commission**

*Development management and woodland*

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS)

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, ancient trees or veteran trees, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 17Sc).

You can find the updated NPPF at  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>  
The Forestry Commission is a non-statutory consultee on developments in or within SOO of ancient woodland - further details.

The Forestry Commission has prepared joint standing advice with Natural England (Last updated 5 November 2018) on ancient woodland, ancient trees and veteran trees which we refer you to in the first instance. This:

- . is provided in place of individual responses to planning consultations,
- . should be taken into account by planning authorities where relevant when determining planning applications,
- . will provide you with links to Natural England's Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts.

In the majority of cases this will provide the advice you need to help you make your decision about a development proposal. If you wish to consult further the Forestry Commission please contact your local Forestry Commission Area office.

In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives. For instance through:

- . the inclusion of green infrastructure (including trees and woodland) in and around new development; and
- . the use of locally sourced wood in construction and as a sustainable, carbon lean fuel.

### **Hampshire County Council (Minerals and Waste)**

The proposed development lies within the mineral and waste consultation area (MWCA) - Sites section.

It lies adjacent to the safeguarded site Farlington Redoubt Portsdown Hill operated by L&S Waste Management.

This area is informed by the safeguarded sites list as defined through Policy 26: Safeguarding - waste infrastructure of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP).

The purpose of this policy is to protect current and potential waste sites from pressures to be replaced by other forms of development, including through 'encroachment' where nearby land-uses impact their ability to continue operating.

We are not objecting to this proposal but would use this opportunity to highlight the proximity of the existing safeguarded waste site to the proposed development. We would be looking to see how the safeguarded waste site would be considered.

It is often the case that appropriate buffers and mitigation measures can make potential nearby development compatible. Any mitigation measures would need to be undertaken by the proposed non-minerals or waste development and reduce potential impacts to and from the safeguarded site to levels that would ensure the safeguarded site could continue its intended minerals or waste use.

Usually the mitigation measures would need to focus on impacts such as noise, dust, visual impact, odour and traffic movements. They can take a variety of forms, including landscape design, tree planting, barriers, building design and orientation and use of different building materials (such as double glazing for windows).

The appropriate mitigation measures are best informed through direct discussions with the operator of the safeguarded site as they will be most aware of operational requirements. However, HCC is also available for further discussions, as well as facilitation, if required.

In order to discharge the requirements of the safeguarding policy, HCC would expect to see how the nearby safeguarded site was considered, how operator comments were taken into account and what impacts that had on the proposed development design. If the details of mitigation are to follow in a future application, HCC would expect to see a condition requiring such details.

In the unlikely event that it is not possible to agree appropriate mitigation measures, HCC would be seeking evidence that the minerals or waste management capacity can be relocated or provided elsewhere and delivered.

Further information on safeguarding and Hampshire County Council's approach to it is available in the adopted Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document, which can be found on our website:

<http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home/hmwp-spds.htm>

### **Hampshire Highways**

The application is supported by a Transport Statement (Glanville - January 2020).

The application site forms the existing Portsdown Hill Gas Facility north of Portsdown Hill Road.

Whilst the current injection facility is currently closed for upgrade work, once operational again, the existing facility received circa 5 - HGV deliveries per day in addition to circa 15 trips per week on an ad-hoc basis relating to maintenance/supervision of the facility.

Currently third-party operators are not permitted to access the site to inject bio-, methane into the facility network due to permitted development regulations. This application seeks to formalise the position for third party operators.

The proposal would result in the site receiving 20 HGV deliveries per day from third party operators to this effect.

No other changes are proposed relating to site layout or other vehicle trips.

In order to inform the assessment, an ATC has been undertaken at two locations being the site access and Portsdown Hill Road to the west of the application site.

The ATe's were undertaken whilst the facility is closed, and the additional 5 HGV trips have been added manually. This approach is considered acceptable.

The ATC recorded a daily circa 500 two-way flow at the sit access comprising circa 130 HGV movements and recorded a daily two-way flow on Portsdown Hill Road of circa 10,000 movements of which circa 800 were HGVs.

In line with the above, it is considered that the proposal would not result in any material increase in traffic generation and would not result in any material impact or harm upon the public highway network.

With this in mind, Highways Development Planning raises no objections to this proposal.

#### **Health and Safety Executive**

HSE's Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.

#### **Historic England**

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

#### **National Amenity Societies - Historic Environment Advice**

No comments received

#### **Open Space Society**

No comments received

**Portsmouth City Council**

I have now reviewed the details and it seems that the proposal would result in an additional 15 HGV movements at the site per day, which is the same information that our Highway Engineer considered at the pre-application stage and raised no objection to. I would therefore conclude that Portsmouth City Council raises no highway objection to this proposal. I have reattached our Highway Engineer's response to the pre-app for reference.

Comments from PCC Highways in relation to pre-app:

This application is to allow a third party operator to inject bio-methane into the gas network at the Portsdown Hill Facility the use of which is currently restricted to SGN. I have reviewed the application details and would make the following observations:

The proposal would result in an additional 15 HGV vehicle movements at the site daily. I am satisfied that this quantum of additional traffic would not have a material impact on the operation of the local highway network.

Visibility at the site access reflects the relevant standards and there is no significant accident record associated with the use of the junction.

In that light as this application stands I would not wish to raise an objection from a highways perspective.

**Ramblers Association**

No comments received

**Southern Gas Network**

No comments received

**Southern Water**

Southern Water would have no objections to the above proposal submitted by the applicant.

**6 Community Involvement**

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 9

Number of site notices: At least one site notice exists - check the number.

Statutory advertisement: Not applicable.

Number of representations received: 1

| Comment                                                             | Officer Comment                          |
|---------------------------------------------------------------------|------------------------------------------|
| The road access to the site comes under Portsmouth City Council not | Comments from PCC now received as above. |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>HCC. PORTSMOUTH City Council should be contacted for a Highways comment.</p> <p>In a recent report on another planning application for the large housing development North of the application site on Campdown, Portsmouth CC Highways stated that the junction of Portsdown Hill and Crookhorn Lane is at capacity.</p> <p>The HGVs from Lift and Shift Waste Transfer Station are only allowed to access and leave the site from the west.</p> <p>There was a serious fire at the Lift a Shift site on 28th June 2019.</p> <p>There are no references in the consultants reports to the planning application for housing development at Campdown.</p>                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>See part 7 - condition recommended in relation to routing.</p> <p>The two highway authorities PCC and HCC raise no objections to the proposals</p> |
| <p>Further to my previous comments. Under this application there will be 15 additional HGV movements into and out of the site.</p> <p>The approach will be from the Rusty Cutter and up Portsdown Hill Road. The roundabout leading to Portsdown Hill is at capacity and The first part of Portsdown Hill Road is very narrow. The vehicles transporting the biogas are very long.</p> <p>The HGVs using the Lift and Shift site next to SGN must turn Westwards out of the site to avoid this narrow section of the Portsdown Hill Road and also to avoid going through residential areas. As this operation is 24 hours a day 7 days a week there should be a condition for these HGVs also to access and leave the site going West initially and then turning right into Crookhorn Lane before joining the A3. I hope the Regulatory Committees will visit the site and look at the width of Portsdown Hill Road and the mini roundabout.</p> <p>There is no report on the file from Portsmouth City Council who are the local authority that cover the access to the site.</p> | <p>See Part 7 and routing condition.</p> <p>PCC comments provided above.</p>                                                                          |

## 7 Planning Considerations

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development/use
- (ii) Impact upon the character and appearance of the area
- (iii) Impact upon residential amenity
- (iv) Highway matters
- (v) Impact on the adjoining safeguarded waste site
- (vi) Ecological constraints
- (vii) Environmental effects
- (viii) Impacts on Scheduled Ancient Monument

(i) Principle of development

7.2 The application site is situated within the non urban area where further development is restricted to that justifying its location outside the built up area. In this case the proposed development represents additional use of an existing facility.

7.3 It is understood that the bio-methane injection facility has been in operation at the site since 2014 and in use by Southern Gas Networks. The proposal is for the use of the facility by third party operators.

7.4 The bio-methane operation exhibits 'green credentials' being a source of renewable energy reducing methane to the atmosphere and utilising waste products in part of its production. Havant Borough Local Plan (Core Strategy) 2011 policy CS14 relates to the Efficient Use of Resources stating that *Planning permission will be granted for development that (amongst other matters); Provides adequate land or funding for waste management infrastructure.* The application is supported by a covering letter which states:

*The use of waste materials has significant benefits for the environment. Carbon dioxide capture provides a recycled source of energy that would inevitably lead to carbon emissions if biological material was left to decompose naturally. Other advantages of using bio-methane are that it is identical to natural gas, helps producers (eg farmers) reduce their own carbon footprints, reduces pressure on landfills and provides an indefinite source of energy.*

*SGN have made a company-wide commitment to environmental improvements across the business. The production and injection of bio-methane forms part of their approach.*

*The use of bio-methane to provide a low carbon source of energy is therefore considered to*

*accord with NPPF Paragraph 150 and Local Plan Policy AL 1.*

7.5 The Pre-Submission Draft Havant Borough Local Plan 2036 sets out the Councils 'direction of travel' in relation to the consideration of development. The weight applied to these policies will increase as the plan moves towards adoption. Policy E12 Low Carbon Design states that *New development is expected to address climate change through low carbon design. Development proposals which are intended to improve the energy efficiency of existing buildings or provide low or zero carbon energy will be supported in principle.*

7.6 Overall, the proposal is considered acceptable in principle subject to other development management considerations set out below.

(ii) Impact upon the character and appearance of the area

7.7 The main impacts from the development are likely to be from vehicular movements and it is noted that the site is relatively well screened from its surroundings and adjacent to existing waste recycling facilities and associated activities. It is not anticipated that the proposal would lead to an unacceptable impact on visual amenity. The Transport Statement quantifies the potential impacts from vehicular movements and these are considered in (iv) below..

(iii) Impact upon residential amenity

7.8 The site is relatively isolated from adjacent properties (the closest being to the South of Portsdown Hill Road and in Portsmouth City Council area). Potential impacts would come from increased traffic and other noise, and dust, however on the basis of the information currently available it is not considered that the proposal would result in any significant increase in the impact on residential amenity. It is noted that the Councils Environmental Health Officer has raised no objection in their consultation response.

7.9 The additional traffic to/from the site will be routed to the west thereby avoiding the built up areas of Bedhampton and providing a more direct route to the A3 and A27.

(iv) Highway matters

7.10 The application has been supported by a Transport Statement. Whilst the site lies within Havant Borough Council's jurisdiction the highways access onto Portsdown Hill Road lies within Portsmouth City Council's jurisdiction (Portsmouth is a unitary authority and is also the Highways Authority within their area). Consultations have therefore taken place with both Portsmouth CC and Hampshire County Council as the relevant highway authorities.

7.11 The Transport Statement sets out us of the existing site and the proposed future use with matters relevant to access and traffic generation given consideration.

7.12 The TS sets out existing uses at the Farlington Redoubt site as follows:

*L&S Waste occupy the eastern half of Farlington Redoubt whilst the western half has been in*

use by SGN since the early 1970s when it opened as Portsdown Hill Pressure Reduction Station (PRS). Since 2014, the northwest corner of the site has been in use as a bio-methane injection facility.

A single private access, which runs north-south through the site and exits onto Portsdown Hill Road, is used by both SGN and L&S Waste. L&S Waste rely on LGVs and HGVs to transport recyclable materials to and from their site.

The bio-methane injection facility is temporarily closed whilst their existing customer carries out upgrades to the plant. Operations are expected to recommence in April 2020 to coincide with planned deliveries from a new customer. The existing customer is expected to recommence operations in Summer 2020. When operational the facility currently receives an average of five HGV deliveries per day (Monday - Sunday). The majority of HGV drivers to / from the injection facility access the site via the Rusty Cutter roundabout to the east (via Bedhampton and Portsdown Hill).

When operational, in addition to HGV's, an average of fifteen visits (by car or van) per week are also undertaken by staff for either planned maintenance, ad-hoc maintenance / fault attendance and supervision. The bio-methane injection facility is the only facility on Farlington Redoubt that is operational on a Sunday.

SGN have no restrictions on operating hours therefore the site could operate 24 hours per day, 365 days a year. The site provides five stanchions for unloading of the gas and can therefore accommodate five tankers at a time. The site can accommodate up to 20 deliveries per day, equalling a total of 140 deliveries per week.

#### 7.13 The TA then sets out details of the proposed use as follows:

It is proposed to allow third party operators to undertake bio-methane injection into the gas network to enable the site to operate at full capacity with a total of 20 HGVs per day. Consequently, the site will be able to operate more efficiently. No changes are proposed to the site layout.

As stated above, when the injection facility is operational, an average of five HGV deliveries are currently made per day. The proposal could therefore increase the number of HGVs delivering to the injection facility by approximately 15 vehicles per day, equating to an additional 105 HGVs per week. The fifteen visits undertaken by staff on a weekly basis

*is not  
expected to increase.*

- 7.14 Details of Existing Traffic to the site are also provided and the proposed additional traffic provided, these results state that:

*The proposal will create up to 15 additional HGVs travelling along Portsdown Hill Road daily in each direction, which will increase the percentage of HGVs by 0.3% on Portsdown Hill Road.*

*The 15 additional vehicles will also access and egress the site daily, increasing the percentage of HGVs travelling inbound and outbound on the access road by 4.3%.*

*SGN are able to operate 24 hours per day, 365 days a year and therefore this increase in traffic flow could be produced by SGN currently if they so wished.*

*Furthermore, deliveries will be spread across the day and the site is located adjacent to the primary road network which avoids routing HGVs along rural roads.*

*Consequently, the proposal is considered unlikely to give rise to any material impact on the local highway network and therefore the Local Highway Authority should be able to recommend approval of the planning application.*

- 7.15 Hampshire County Council Highways have concluded in relation to highway matters that:

*In line with the above, it is considered that the proposal would not result in any material increase in traffic generation and would not result in any material impact or harm upon the public highway network.*

*With this in mind, Highways Development Planning raises no objections to this proposal.*

- 7.16 Portsmouth City Council comment that:

*I have now reviewed the details and it seems that the proposal would result in an additional 15 HGV movements at the site per day, which is the same information that our Highway Engineer considered at the pre-application stage and raised no objection to. I would therefore conclude that Portsmouth City Council raises no highway objection to this proposal.*

- 7.17 Concerns have been raised by a third party with regard to the routing of the additional HGV traffic. In order to avoid additional HGV movements through Bedhampton residential area and the small roundabout at the foot of Portsdown Hill Road, the routing of the additional HGVs will be conditioned to be to the west of the access providing more direct routes onto the main road network.

Impact on the adjoining safeguarded waste site

- 7.18 It is noted that the current Southern Gas site is located alongside the existing safeguarded site Farlington Redoubt Portsdown Hill operated by L&S Waste Management. The proposal would result in additional vehicle movements into and out of the site, however, there would be no changes to the physical layout of the site and there are enough docking points for vehicles to accommodate the raise in movements (extra 15 HGV movements/day above the movements when SG operation working). It is not anticipated that the proposed development would negatively impact the operation of the safeguarded site.

#### Ecological constraints

- 7.19 The site is located adjacent to an SIN and the proposal would result in an increase in the intensity of the use of the site. The application is accompanied by a Preliminary Ecological Appraisal and has been assessed by the County Ecologist who concludes that *the site is of minimal ecological interest and that the proposal is not likely to result in an ecological impact. I do not consider that ecological mitigation or enhancements are required and there is essentially no location where meaningful measures could be provided in any case.*

#### Environmental effects

- 7.20 The increase in traffic generated from the site is considered to result in the main change from the proposal. The movements are 24 hour, however, the level of vehicular movement is limited as set out above. It is noted that no objection has been raised by Environmental Health and it is not considered that the proposals are likely to result in unacceptable environmental effects.

#### Impacts on Scheduled Ancient Monument

- 7.21 It is noted that the site is in close proximity to a Scheduled Ancient Monument - Fort Purbrook including covered way to east. The application has been supported by a Heritage Statement. The Council's Conservation Officer has commented that:

*The detailed Heritage Statement produced by Archaeology Collective, has thoroughly assessed the potential impact on the significance of adjacent and nearby heritage assets and concluded that there will be minimal impact to these heritage assets as a result of the change of use. I am minded to agree with the findings of this assessment and am satisfied that the proposal accords with the relevant national and local planning policies.*

- 7.22 In addition, the County Archaeologist has confirmed that: *I would not wish to raise any archaeological issues in this particular instance.*
- 7.23 It is therefore considered that the proposed development would not detract from heritage assets and that tests set by the Listed Buildings and Conservation Areas Act and the NPPF have been met in this case.

## **8 Conclusion**

- 8.1 In conclusion, it is considered that the development is acceptable in principle and has an acceptable impact on the character and appearance of the area and on residential amenity.

- 8.2 The main issue identified relates to highway matters, however, given the relatively limited increase in HGV movements and the routing which is to be conditioned the development is considered to have an acceptable impact on the highway network and in terms of potential environmental effects.
- 8.3 In terms of site specific matters, the operation is considered to be unlikely to impact negatively on the safeguarded waste site at Farlington Redoubt as set out above. Whilst there are Ecological and historic asset constraints these have been assessed and it is not considered that any unacceptable impacts would result from the development.
- 8.4 In conclusion, planning permission can be recommended for the proposed development.

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## 9 RECOMMENDATION:

That the Head of Planning be authorised to **GRANT PERMISSION** for application APP/20/00077

(A) subject to the following conditions

- 1 The development must be begun not later than three years beginning with the date of this permission.

**Reason:** To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Site Location Plan Drawing No. SO/PORT/B/001 Rev A  
Site Layout Drawing No. SO/PORT/B/002 Rev A  
Vehicle routing email Carter Jonas dated 17th March 2020  
HGV Routing Drawing No. 8190812/6001  
Transport Statement Glanville Ref: BS8190812/AD/DW/003 Issue 3  
Technical Summary SGN 28th June 2019 Revision 4  
Preliminary Ecological Appraisal CT Ecology 17th January 2020 Ref: 19049  
Heritage Statement Archaeology Collective Project Ref AC1266 Document version: M:\Archaeology Collective\Projects\Projects 1001-1500\Projects 1201-1300\01266 - Portsdown Hill Road\01266A \Reports  
Covering Letter Carter Jonas Ref: AH/RB/DC  
Air Quality Assessment Air Quality Consultants December 2019

**Reason:** - To ensure provision of a satisfactory development.

- 3 The routing of HGV traffic associated with the use of the site by third party operators to inject bio-methane into the existing gas network shall be as

detailed on the HGV Routing Plan Drawing No. 8190812/6001 with HGVs entering and exiting the site to the west.

**Reason:** In the interest of ensuring the most appropriate routes are taken to the main highway network having due regard to residential amenity, traffic movements and the operation of the highway network together with policies CS16, CS20, DM10 and DM23 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.