

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/01671	Your Ref:	APP/18/00587
EH Case Officer Extn:	44 6677	Date:	23 August 2018
DC Case Officer:	Mrs Emma Chisnall		
DC Case Officer Extn:	6523		
Application Number:	APP/18/00587		
Site Address:	Land adjacent to, Electricity Sub Station, Harts Farm Way, Havant		
Proposed Development:	Variation of Condition 7 of Planning Permission APP/14/00800 relating to approved plans to allow for the installation of a Selective Catalytic Reduction, proposed Adblue Tank and revised compound layout.		

Observations / Comments:

I have reviewed the documents submitted in support of this application, and have referred to the applications made under APP/14/00800 and APP/14/00450. I would like to make comments as regards air quality. I do not believe that there are likely to be any further comments from Environmental Health (e.g. as regards noise / nuisance resulting from new plant), however Mark Moss has been allocated the application for review for this purpose, and I would not wish to pre-empt his more qualified response in this respect.

Air Quality

SCR technology using Adblue achieves the NO_x emission reduction by altering the emissions chemistry. Deployment of this technology serves as an 'emissions substitution', reducing NO_x but increasing emissions of ammonia (NH₃).

There are multiple EU designated ecological sites, SINC's and SSSI's located within ~500m of the PeakGen site, and these sites are sensitive to NH₃ pollution. These distances are broadly similar to those for the nearest human receptors, who are sensitive to NO_x emissions.

For this reason, whilst it could be argued that the development is 'air quality neutral' in concept - an air quality assessment would be required to quantify the balance of impact (determine net harm, or net positive). It could similarly be argued that it is only desirable for the proposed development to be permitted only if it is required.

There is insufficient detail on file (under this-, or any preceding- application) to determine whether the applicant has correctly interpreted the regulations as regards the relevant permitting date, and/or the date at which the emissions standards referred to come into force. I am also aware that generator manufacturers often express emissions in different units, and/or subject to different reference conditions (temperature, pressure, and oxygen content), and are not always directly applicable to the emissions standard referred to in schedule 25B 5.(1)(a) to the Environmental Permitting Regulations 2016

In order to comment authoritatively, I would need the applicant to confirm:

- i) The generator manufacturers emissions data, including the reference standards to which the published figures apply
- ii) The date of the capacity agreement [under which the generator set is supplying electricity / balancing services] was put to auction. Auction year will suffice.
- iii) The Net Rated Thermal Input of the generator unit (assuming all 10 units are identical, or if not, of each unit installed at the site)
- iv) The number of hours that the units were in operation over the preceding 12 month period.

The above information is material to whether the development is needed- a) at all, b) by 1st Jan 2019, c) by 1st October 2019, or d) by 1st January 2025.

If the applicant is electing to install the plant ahead of the requirement to do so, I would be of the opinion that it would be appropriate to quantify the air pollution impact of the development. This might apply if the development falls under a) or d) from the paragraph above.

If (on the other hand) the development is indeed required in order to meet the requirements of the Medium Combustion Plant Directive (and Environmental Permitting Regulations 2016 – i.e. b) or c) from the paragraph above), then the principle of development can be accepted without the need to quantify the impact.

I would recommend that the above detail is sought from the applicant in order to discern the appropriate response.

Mr. Jonathan Driver
Environmental Control Officer