

Planning Application for the Construction and Operation of a 20MWe Peaking Power Generation Plant, Ancillary Equipment and an Track on Land at Blendworth, adjacent to Havant Thicket, Hampshire, PO7 8RL.

Rydberg Development Company Limited

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Table of Contents

Planning Application Statement

Table of Contents	i
List of Drawings	ii
Chapter 1 - Introduction	1
Chapter 2 - The Site	4
Chapter 3 - Background to the Development	6
Chapter 4 - Description of Development	9
Chapter 5 - Planning Policy Context and Assessment	14
Appendix 1 - Landscape and Visual Assessment	
Appendix 2 - Preliminary Ecological Appraisal	
Appendix 3 - Heritage Desk Based Assessment	
Appendix 4 - Flood Risk Assessment	
Appendix 5 - Transport Statement	
Appendix 6 - Air Quality Assessment	
Appendix 7 - Noise Assessment	

List of Drawings

Drawings

Drawing No. RDCL-01	Location Plan
Drawing No. ENQ 6540-05-1001-D-F	Site Boundary
Drawing No. ENQ 6540-05-1002-D-E	Lease Boundary
Drawing No. ENQ 6540-05-1003-D-E	Site Layout
Drawing No. ENQ 6540-05-1004-D-E	Site Elevations
Drawing No. ENQ 6540-05-1005-D-A	Switchgear Container
Drawing No. ENQ 6540-05-1006-D-A	Gas Kiosk
Drawing No. ENQ 6540-05-1007-D-A	Left Handed Gas Generator
Drawing No. ENQ 6540-05-1008-D-A	Right Handed Gas Generator
Drawing No. ENQ 6540-05-1009-D-A	WPD Combined GRP Enclosure and Metering
Drawing No. ENQ 6540-05-1010-D-A	Lube Oil Tanks
Drawing No. ENQ 6540-05-1011-D-B	Single Acoustic Fence Panel
Drawing No. ENQ 6540-05-1012-D-A	Transformer
Drawing No. ENQ 6540-05-1013-D-A	Transformer Bund

1 Introduction

1.1 Background to the Development

- 1.1.1 This Planning Statement has been prepared by 3rE Planning Limited to accompany two applications for planning permission that have been submitted to Havant Borough Council (HBC) and East Hampshire District Council (EHDC), by Rydberg Development Company Limited for the construction and operation of an 20MWe Peaking Power Generation Plant, ancillary equipment and an access track ('The Development') on Land at Blendworth, adjacent to Havant Thicket, Hampshire, PO7 8RL, ('The Site'). The Site is at National Grid Reference SU709103.
- 1.1.2 Applications have been simultaneous submitted to HBC and EHDC because the application site straddles the boundary of the two Councils. The application to HBC includes the plant compound and the southern section of the access track, whilst the application to EHDC includes only the northern section of the access track.
- 1.1.3 For simplicity and ease of understanding the details included in the two applications are the same and this Planning Application Statement has been submitted to both Councils together with the accompanying drawings and supporting technical reports.
- 1.1.4 The purpose of the plant, is to generate electricity at short notice to meet peaks in demand within the local electricity network. This typically happens when existing or established sources of generation are unable to generate sufficient electricity, or when there are short periods of exceptionally high demand that cannot be met from existing sources. At such times these plants will be activated at short notice to manage such fluctuation in demand and supply. Similar plants are sometimes known as Short Term Operating Reserve (STOR) generation plants or Standby Power Generation Plants.
- 1.1.5 There are significant technical benefits to the security and efficiency of the energy system by locating such plants as close as possible to areas of high electricity demand. This sort of generation is known as "Embedded Generation" as it is connected at a lower voltage than traditional large power generation schemes. The proposed Peaking Power Generation Plant at Blendworth is embedded and will provide such benefits.
- 1.1.6 The National Grid owns and operates the national electricity network. They are obliged to ensure that the electricity supply system runs within specified limits and in particular to manage fluctuations in short term operating conditions when there is potential imbalance between demand and supply.
- 1.1.7 Flexible Peaking Power Generation capacity forms a particularly important part of renewable energy infrastructure, because renewable sources, notably wind and solar PV, are supplies that are dependent on the time of day and weather conditions.
- 1.1.8 The National Grid has estimated that for every 8kW of wind power added to the grid, 1kW of reserve, or back-up energy, generated by facilities such as this type of plant is required. Traditional power stations are generally not designed or able to meet short term demand and fail to deliver the flexibility that is needed. With an increasing proportion of electricity being sourced from renewable energy sources, the National Grid predicts a much greater dependence on sources of reserve power, from multiple small generation plants, will be required in the future.

1.1.9 Consequently, any shortfalls in future electricity generation from certain renewable sources, or short term increases in demand upon the electricity grid, need to be met by alternative means at relatively short notice. A deal with the Government through the National Grid is currently seeking to procure additional capacity throughout the UK.

1.1.10 The planning application for the proposed Peaking Power Generation Plant on land at Blendworth, adjacent to Havant Thicket, forms part of the proposed network of small scale installations that Rydberg Development Company Limited are proposing to develop around the UK.

1.2 The Application

1.2.1 This application has been prepared and submitted in accordance with the following statutory requirements, regulations and guidance published by HBC and EHDC:

- Town and County Planning Act 1990 (as amended);
- The Town and Country Planning (Development Management Procedure) (England) Order 2015;
- Town and Country Planning (Environmental Impact Assessment) Regulations 2011;
- Planning Practice Guidance; and
- HBC's and EHDC's Validation Checklist for Applications for Planning Permission.

1.2.2 The application is supported by a number of technical assessments including the following:

- Part 1 - 1-App Planning Application Form, Certificates and Notices
- Part 2 - Planning Application Statement;
- Part 3 - Drawings

1.2.3 This Planning Application Statement provides an explanation of the principles behind and justification for the Development, and an assessment of how it complies with national and local planning policies, and how it is supported nationally by climate change and renewable energy policy.

1.2.4 Chapter 1 presents an introduction to the Development; Chapter 2 sets out details of the Site and the surrounding area including the Planning History; Chapter 3 provides the background in terms of relevant energy policy; Chapter 4 the description of the Development; and Chapter 5 the planning policy context and assessment.

1.2.5 The total application site area is calculated as 2.34ha which exceeds the threshold for consideration as 'major development' within the definition set out in paragraph 2 of the Town and Country Planning (Development Management Procedure) Order (England) 2015. The area of the plant compound site however is limited to 3272m², with the remainder comprising the access track. The area of the red line boundary within Havant Borough Council is 1.18ha and the area within the East Hampshire District Council is 1.16ha.

1.2.6 Because the area of the Site a Design and Access statement is required to accompany the application. This is included as a separate Statement to accompany this Planning Application Statement.

1.2.7 The proposal does not fall within any of the 'descriptions of development' listed in Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ('The EIA Regulations'). The project would however, fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, Schedule 2, Paragraph 3

‘Energy Industry: (a) Industrial Installations for the production of electricity, steam and hot water (unless included in Schedule 1).

- 1.2.8 EIA is not obligatory for Schedule 2 projects, but if the thresholds stated in the Schedule are exceeded then the project must be screened in order to determine whether EIA is required. There is a threshold for the size of site of 0.5 ha. No formal request for an EIA Screening Opinion has been submitted to HBC or EHDC prior to submission of either planning application, so it accordingly assumed that one or other or both Councils will undertake EIA Screening under Regulation 5 of the EIA Regulations. It has been assumed that the project is not likely to be EIA development as it not anticipated that there will be any significant environmental impacts. The application is accordingly supported by a number of technical assessments to address the environmental impacts.

- 1.2.9 The supporting technical assessments with this application include the following:

- Landscape and Visual Assessment (Appendix 1);
- Preliminary Ecological Appraisal (Appendix 2);
- Heritage Desk Based Assessment (Appendix 3);
- Transport Statement (Appendix 4);
- Air Quality Assessment (Appendix 5); and
- Noise Assessment (Appendix 6).

1.3 Pre-Application Consultation

- 1.3.1 No formal pre-application consultation has been undertaken with either HBC and EHDC, although informal consultation has been undertaken with some statutory consultees in preparing this planning application and the supporting technical assessments.

2 The Site

2.1 The Site

- 2.1.1 The Site which has an area of 2.34 hectares as shown on Drawing No. ENQ 6540-05-1001-D-D, and is located on land to the north of Bells Copse between the A3(M) and the B2149 (Manor Lodge Road) and will be accessed via a new track that will partly be constructed adjacent to the west side of the existing Forestry Commission track situated to the west and north of Havant Thicket with the access on to the B2149 approximately 400m north of Havant Thicket.
- 2.1.2 The plant compound has an area of 3272m² as shown in Drawing No. ENQ 6540-05-1003-D-E and comprises a wooded and scrubland area to the east of the A3(M).

2.2 The Surrounding Area

- 2.2.1 The surrounding area is mostly scrub land and woodland. The Site lies to the immediate west of Havant Thicket and to the north of Bells Copse which are areas of ancient replanted woodland. There are traditional orchards, upland calcareous grassland, upland fen flushes and swamp, upland heath and wood pasture and parkland all within 2 km of the Site. The Site is identified as Grade 4 Agricultural Land on the Agricultural Land Classification Map for England.
- 2.2.2 The Site is approximately 1.5km north west of Staunton Country Park. Waterloooville Golf Course is located 550m west of the Site on the west side of the A3(M), and the nearest residential area consisting of Cornbrook Grove, Acre Lane and Farrier's Way lies approximately 650m south west of the Site. Blendworth Common and the Motor Racing Track are located approximately 1km north of the plant compound.
- 2.2.3 The boundary of the South Downs National Park is located approximately 1.1km north east of the Site.
- 2.2.4 The Site itself is located within the Blendworth Common Site of Importance for Nature Conservation (SINC) but is not located within any statutory ecological designations and there are no such designations in the immediate vicinity. There are however a number of designations in the wider surrounding area. These include Hazleton Common Local Nature Reserve (1.3km north east); Chichester and Langstone Harbours Ramsar Site (5.1km south); Chichester and Langstone Harbours Special Protection Area (5.1km south); Solent Maritime Special Area of Conservation (5.1km south); Langstone Harbour SSSI (5.1km south); and Catherington Down SSSI (4.2km north west).
- 2.2.5 There are a substantial number of Listed Buildings and Scheduled Monuments in the surrounding area and the Leigh Park Grade II* Registered Park and Garden is located 700m south east of the plant compound and the Stanstead Park Grade II Registered Park and Garden, 2.7km east of the Site.
- 2.2.6 The Site is located within a Groundwater Protection Zone - Inner Zone 1, for subsurface activity, and within Nitrate Vulnerable Zone for surface water.
- 2.2.7 The Site is located in Flood Zone 1 with no significant Flood Risk and there are no Public Rights of Way affecting the Site.

2.3 Planning History of the Site

- 2.3.1 HBC's On-line Planning Applications Search facility shows that there have been no previous applications in relation to the Site. However, an application was submitted to EHDC in October 2015 for a similar type of development which was withdrawn in December 2015. (Application Ref. No. 55023/004). The previous application site was located 1.1km north of the plant compound now proposed, but was for diesel rather than gas powered plant as now proposed. The application included the installation of four, 40,000 litres capacity, above ground diesel storage tanks and 10 generator sets.

3 Background to the Development

3.1 Energy Security Strategy

- 3.1.1 The Development of the proposed Peaking Power Generation Plant is being brought forward to generate electricity on demand during peak demand times, in line with the Government's Energy Security Strategy (DECC November 2012).
- 3.1.2 The Energy Security Strategy which was published in November 2012 in response to concerns about energy security in Britain, identifies that the UK has experienced strong energy security in recent years from a combination of liberalised energy markets, robust regulation and extensive North Sea resources. However, it recognises that the UK faces some significant new challenges that need to be addressed. These include that:
- About a fifth of power stations are due to close within the current decade, as they come to the end of their working life or are deemed too polluting for modern standards;
 - The UK's energy system will need to adapt to ensure that we can meet ambitious legally binding carbon emission reduction targets, requiring significant investment in low carbon technologies; and
 - Declining reserves of fossil fuels in the UK Continental Shelf (UKCS) are making the UK increasingly dependent on imports at a time of rising global demand and increased resource competition.
- 3.1.3 The Energy Security Strategy sets out how the Government proposes to respond to these challenges. It assesses energy security; providing an analysis of the UK's energy security outlook in the short and longer term; and an overview of the policy measures being taken by the Government to ensure that energy security is maintained while the UK decarbonises its energy system.

3.2 Resilience of the Electricity System

- 3.2.1 Following the publication of the Energy Security Strategy, the House of Lords issued the 1st Report of Session 2014–15, into the resilience of the electricity system in Great Britain. It defines resilience as "the ability of assets, networks and systems to anticipate, absorb, adapt to and/or rapidly recover from a disruptive event."
- 3.2.2 The report identifies four components to infrastructure resilience, as comprising; resistance (level of protection); reliability; redundancy (spare capacity); and response and recovery.
- 3.2.3 The report also identifies what is known as the energy 'trilemma' which describes the difficulties associated with balancing the three interconnected and competing demands of security of supply; sustainability; and affordability. Put more simply the Government has described it as: "The challenge of keeping the lights on, at an affordable price, while decarbonising our power system."
- 3.2.4 In 2008, the European Union (EU) committed to a legally-binding 20% cut in Greenhouse Gas (GHG) emissions by 2020 and to conditionally increase this target to 30%. Under the EU

Renewable Energy Directive 2009/28/EC, the UK has a target to source 15% of energy demand from renewables by 2020, including 30% of its electricity.

- 3.2.5 In 2011 the UK Government's Roadmap for Renewable Energy for the UK included an analysis of potential deployments to 2020 which produced illustrative 'central ranges' for deployment showing the UK can deliver 234 TWh of renewable energy overall in 2020; equivalent to 15% of the UK's projected energy consumption.
- 3.2.6 The Government recognises that there are trade-offs between improving sustainability and ensuring security of supply. The need to decarbonise electricity generation is a key factor in the sustainability corner of the trilemma. The requirements for decarbonisation are set by the Climate Change Act 2008, which established legally binding targets for the reduction of greenhouse gas emissions by 80% by 2050. The power sector accounts for around 27% of the UK's greenhouse gas emissions. The Committee on Climate Change recommends early decarbonisation of the power sector as this provides opportunities for electrification and decarbonisation of other sectors such as heating and transport. The Committee on Climate Change therefore recommends that the carbon intensity of power generation should be reduced from 500 g CO₂/kWh to 50 g CO₂/kWh by 2030. The problem that this poses is that increased use of renewable energy resources, which are dependent on the time of day and weather conditions, means that to ensure security of supply, effective backup or reserve is required, at times when there are peaks in demand or drop in supply.

3.3 Capacity Market/Mechanism

- 3.3.1 These concerns are now addressed through the introduction of the Capacity Market which will operate from 2018, which is also referred to as the Capacity Mechanism. This was seen as being a key factor in improving short term resilience.
- 3.3.2 The Capacity Market works by offering all capacity providers (including new and existing power stations, and electricity storage) a steady, predictable revenue stream on which they can base their future investments. In return for this revenue (capacity payments) they must deliver energy when needed to keep the lights on, or face penalties.
- 3.3.3 The aim is to ensure that there is enough capacity in the future, including the provision of balancing services which provide an 'insurance policy' so that sufficient electricity can be made available to meet demand when the system is stretched.
- 3.3.4 Capacity payments are won through a competitive auction which is being held in two stages. The first stage procured capacity started in December 2014 has procured capacity for 2018 and procured 49GW of additional capacity. A second stage is to be held in 2016 to fine tune the amount of capacity available. Because the Capacity Market will not come into effect until 2018 following the first stage auction, interim measures are needed sooner to address the capacity shortfall and provide reserve. These measures, known as New Balancing Services (NBS).

3.4 Peaking Power Generation

- 3.4.1 Peaking Power Generation will form an important part of the New Balancing Service by providing additional active power. It is needed because at certain times of the day National Grid needs reserve power in the form of either, generation to be able to deal with actual demand being greater than forecast demand, and/or plant unavailability.

- 3.4.2 National Grid procures Peaking Power Generation by contracting with a range of service providers by means of Peaking Power Generation and/or demand reduction as a Balancing Service.
- 3.4.3 The need for Peaking Power Generation varies depending on the time of year, the time of week and time of day, being a function of the system demand profile at that time. To reflect this, National Grid splits the year into a number of Seasons, for both Working Days (including Saturdays) and Non-Working Days (Sundays and most Bank Holidays), and specifies the periods in each day that Peaking Power Generation is required. These periods are referred to as Availability Windows.
- 3.4.4 The Peaking Power Generation Plant proposed at Blendworth is classed as a Distributed or Embedded Generator as it will be connected to the Local Distribution Network not to the National Grid Transmission Network. If Distributed Generation is connected close to the point of use, there is a reduced need for distribution and transmission infrastructure. This results in reduced transmission losses which has a direct benefit to the environment as energy is not wasted in feeding these losses compared with centralised power stations and the bulk transmission of electricity. Another significant benefit is with respect to improvements to local security of supply. Generating close to the electricity load can reduce the stress on the electricity transmission and local distribution infrastructure and improves the security of supply to the local community and potentially avoid the need for reinforcement works to this infrastructure.

4 Description of Development

4.1 Plant Infrastructure

4.1.1 This application is for the construction and operation of an 20MW flexible Peaking Power Generation Plant, ancillary equipment and an access track, on land at Blendworth, adjacent to Havant Thicket, Hampshire, PO7 8RL.

4.1.2 The location of the Site has been chosen because of the ability to connect to both the gas grid and the electricity grid in a location where there is adequate capacity on the electricity grid.

Key Components – Generation Sets and Other Plant

4.1.3 The Development will comprise ten gas fired engine-driven electricity generation sets that provide a total of up to 20MWe generating capacity, which will be housed in acoustically insulated weather proof steel containers. The site layout, including all the components of the Development, are shown on Drawing No. ENQ 6540-05-1003-D-E.

4.1.4 The engines are fuelled by natural gas and use conventional spark ignition technology to burn the fuel which in turn rotates the generator creating the electricity which is then exported to support the local electricity network. The engine-generator sets will sit side-by-side in two blocks, one of four engines and the other of six engines.

4.1.5 The heat generated by the engines is dissipated in radiators built into the generator sets. The engine cooling system is a closed loop water system which continues for as long as the plant is in operation. There will be a 9m exhaust flue for each engine, which is shown on Drawing No. Drawing No. ENQ 6540-05-1007-D-A, and on Drawing No. ENQ 6540-05-1008-D-A.

4.1.6 The natural gas supply required to fuel the engine-generator sets is available at the required pressure and capacity running to the west of the Site. An application has been submitted to the National Grid for a gas connection, which will be carried out under permitted development. A gas kiosk will be provided on-site, and is shown on Drawing No. ENQ 6540-05-1006-D-A.

4.1.7 An electrical connection, required to export the electricity generated to the local electricity network, is available from the existing 33kv line 400m from the plant compound adjacent to the A3m.

4.1.8 In addition to the generator sets and gas kiosk, a switchgear container, shown on Drawing No. Drawing No. ENQ 6540-05-1005-D-A will be located within the plant compound together with five transformers, shown on Drawing No. ENQ6540-05-1012-D-A, and four lube oil tanks, which are shown on Drawing No. ENQ6540-05-1010-D-A.

4.1.9 The plant compound will be enclosed by a 4.5m high acoustic fence as shown on Drawing No. ENQ6540-05-1011-D-B with a combined DNO Substation and metering enclosure located outside the compound adjacent to the Site access, as shown on Drawing No. ENQ6540-05-1009-D-A.

4.1.10 Site Elevations are included on Drawing No. ENQ6540-05-1004-D-E.

Access, Car Parking and the Compound

- 4.1.11 Access will be via a new track that will partly be constructed adjacent to the west side of the existing Forestry Commission track situated to the west and north of Havant Thicket with the access on to the B2149 approximately 400m north of Havant Thicket.
- 4.1.12 The new access track would be segregated from the existing Forestry Commission track by an existing native hedgerow. The access track would be 1.7km long by 5m wide, within a red line boundary allowance of 8m width, resulting in an area of about 1.16ha within EHDC, and about 0.27ha in HBC. The track would be gravel surfaced, similar in appearance to an agricultural field track. A no-dig construction method would be adopted using a geotextile membrane to spread the weight of vehicles using the track and to avoid damage to the roots of adjacent existing trees. This method would be adopted on the length of the track which lies adjacent to the ancient woodland designation, and then intermittently depending on the occurrence of mature field trees in the adjacent hedgerow to the proposed track.
- 4.1.13 It is proposed to provide 3 marked car parking bays, two within the plant compound for visiting maintenance staff, and one outside the compound for visiting DNO maintenance staff. An HGV turning circle has been incorporated into the design of the plant compound.

Drainage

- 4.1.14 It is proposed not to hard surface the working area of the plant compound. Instead this will be constructed from hardcore laid on permeable membrane, to provide a sustainable drainage solution. It is anticipated that there will, as result, be no increase in off-site flood risk when compared to the existing situation.
- 4.1.15 The lube oil tanks proposed on the Site will be double-bunded.

Lighting

- 4.1.16 Site lighting will comprise standard, Low Energy LED down lights positioned on the generator sets, switchgear containers or kiosks. These will be activated by vehicles or personnel that enter the Site. The lighting units will be hooded to minimise light impacts/spillage. Other than when periodically activated, lights will generally remain off.

Design and Landscaping

- 4.1.17 The plant largely uses standardised components as it entirely comprises prefabricated plant and machinery components, in which functional design efficiency is the dominant theme. As a result, this limits the opportunities to incorporate 'design', with the main concern being with the layout of the plant and the extent to which the environmental features of the Site and surrounding area can be utilised to minimise its environmental impacts, and particularly its visual impact.
- 4.1.18 In the case of the Blendworth site, the adjacent land consists of scrub land and woodland. Limited vegetation removal will be required, involving the loss of two mature field trees from within the plant compound. However, other trees would be retained to provide screening from the north and west. Further impacts on trees and hedgerows have been minimised with the retention of all of the vegetation within the boundary hedgerows and woodland, though some removal of vegetation for the access road may be required where a field boundary needs to be crossed. Although there would be moderate levels of landscape impact on a few of the Site's

internal landscape features, and though these are contributory factors to the character of the Site, the overall impact on the landscape character of the wider area would be minimal.

4.2 Construction Phase

Construction Programme and Phasing

4.2.1 The construction phase of the Development is planned to be undertaken over a period of 4-6 months; and will comprise the following:

- Pre-Construction Investigations: Further site investigation and pre-construction surveys required to be undertaken in advance of construction and to inform detailed design;
- Formation of a temporary storage area: Establishment of all temporary facilities including site offices, welfare facilities, lay down and storage areas, development of electricity and water supplies and erection of site signage as required;
- Installation of the generation sets and other plant;
- Installation cabling and pipework etc.
- Commissioning and site reinstatement: including removal of temporary facilities and landscaping (if required).

Temporary Construction Compound and Storage Area

4.2.2 During the construction period there will be a requirement for temporary construction facilities including storage and laydown areas for construction vehicles, plant, equipment and other materials, a site office and welfare facilities. These will be provided within the plant compound and a turning area for HGVs making deliveries will be maintained throughout the construction phase.

Construction Access

4.2.3 Access during the construction phase will utilise the proposed access from the B2149 to the plant compound. Details of construction traffic movements set out in the accompanying Transport Statement.

Hours of Working

4.2.4 Hours of working during the construction phase will be 07:00 - 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. No works will be undertaken on Sundays or Bank Holidays.

Construction Environmental Management Plan (CEMP)

4.2.5 During construction, the Contractor will be required to operate under a site specific Construction Environmental Management Plan (CEMP). The CEMP will set out a variety of control measures for managing the potential environmental effects of construction works including control and management of noise, dust, surface water runoff, waste and pollution control. It will draw upon general construction practice taking into account the guidance contained within, but not limited to, the following good practice guidance documents:

- CIRIA Document C692 Environmental Good Practice on Site;
- PPG01 - General Guide to the Prevention of Pollution;
- PPG02 - Above Ground Oil Storage Tanks;
- PPG03 - Use and Design of Oil Separators in Surface Water Drainage Systems;
- PPG04 - Treatment and Disposal of Sewage where No Foul Sewer is Available;
- PPG05 - Works and Maintenance in or Near Water;

- PPG06 - Working at Construction and Demolition Sites;
- PPG07 - Refuelling Facilities;
- PPG08 - Safe Storage and Disposal of Used Oils;
- PPG21 - Pollution Incident Response Planning;
- PPG22 - Dealing with Spill; and
- Environmental Permitting Regulations.

Construction Waste Management

- 4.2.6 It is not envisaged that there will be any significant excavation on the Site during the construction phase. If there are any waste materials, largely packaging material associated with the delivery of plant components, these will be disposed of off-site to a licensed waste disposal facility, in accordance with the relevant legislation; the Environmental Protection Act 1990 and the Environmental Permitting Regulations 2010.

Health & Safety

- 4.2.7 Health and safety during construction will fall under the Construction (Design and Management) (CDM) Regulations 2015. A Construction Phase Health and Safety Plan will be prepared following the award of consent.
- 4.2.8 Suitable signs will be erected at the entrance to the Development in order to highlight that construction activities are being undertaken and provide directions and health and safety information.

Site Restoration & Commissioning

- 4.2.9 At the end of the construction period all temporary facilities will be removed. This will be followed by a period of commissioning.

4.3 Operational Phase

Operational Lifetime

- 4.3.1 The Development will have operational life of 15-20 years after which it would be decommissioned. During operation, activities on-site will be limited to routine maintenance and servicing of plant, the electrical systems and the DNO as required. This could include planned maintenance and repairs as well as emergency repairs.

Operation

- 4.3.2 Although the plant must be available to the National Grid for operation 24 hours a day, it will only run for short periods of time, with long periods between operating.
- 4.3.3 The plant is controlled remotely to support the National Grid during periods of high demand or when intermittent renewable energy generating plants fail to deliver as expected. The Site will be unmanned albeit regular maintenance will be undertaken by a visiting team of technicians.

Site Environmental Management

- 4.3.4 Whilst activity on-site will be limited during the operational phase the requirements of the CEMP including control measures with respect to noise, emissions, surface water runoff, waste and pollution control will remain in place in order to determine when any maintenance works are required.

4.4 **Decommissioning**

4.4.1 At the end of its operational life the Development will be decommissioned. This will be undertaken in accordance with current good practice. This will involve the removal of all above ground infrastructure and reinstatement of any disturbed ground as may be required.

4.4.2 A decommissioning plan will be prepared and agreed with the relevant authorities one year prior to decommissioning.

4.5 **Employment**

4.5.1 Construction of the generation facility will take around 4-6 months and employ up to 8 construction staff with these jobs sourced locally if possible.

4.5.2 Once operational, the proposed development will provide 2 part-time equivalent jobs in respect of the operation and maintenance of the facility during its 15-20 year operational lifespan. Again, these jobs will be sourced locally if possible.

5 The Planning Policy Context and Assessment

5.1 Introduction

- 5.1.1 The purpose of this Chapter is to provide a summary of planning policy that is relevant to the determination of the Application.
- 5.1.2 Relevant policies include national and local planning policies. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that:
- “For the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the [development] plan unless material considerations indicate otherwise”.*
- 5.1.3 Section 38(3) of the Planning and Compulsory Purchase Act 2004 identifies that the development plan comprises the development plan documents and any neighbourhood development plans which have been adopted or approved in relation to an area.

5.2 Planning Policy

The Statutory Development Plan

- 5.2.1 Because the Site straddles the boundary of HBC and EHDC, the statutory development plan encompasses the adopted plans of both authorities. These include the Havant Borough Core Strategy (adopted March 2011) to 2026, the Saved Policies of East Hampshire Local Plan: Second Review (2006) and the East Hampshire District Council Local Plan Joint Core Strategy (May 2014, details of which are set out below.
- 5.2.2 There are currently no adopted Neighbourhood Plans that are applicable to the Development within the area of either Council.

Havant Borough Council Core Strategy (Adopted March 2011) to 2026

- 5.2.3 The Havant Borough Core Strategy is the principle document in the Council’s local Plan and sets out the overall vision, strategic objectives, spatial strategy and strategic planning policies for the area to 2026. The Havant Local Strategic Partnership (HLSP) produced its Sustainable Community Strategy, Forward Together in 2008. It has links to the Hampshire Sustainable Community Strategy, Shaping Our Future Together and the Olympic Vision. The HLSP vision for the borough involves working together to plan and manage all of the Borough’s resources and individual effort, so that individuals and the community can flourish whilst providing for the needs of future generations. The Core Strategy vision for the Borough is based on the Council’s corporate vision expressed in Forward Together; ‘working towards a cleaner, safer, more prosperous borough’ and relates to, and builds on, the characteristics outlined in the Core Strategy.
- 5.2.4 The Core Strategy states, ‘The vision for Havant Borough in 2026 will be a cleaner, safer and more prosperous place. It will be a place where people of all ages and circumstances will want to live, visit or work. It will be widely recognised for its sustainable, innovative and high quality design developments and the stewardship of its natural and built environment.’
- 5.2.5 Whilst the Core Strategy itself, has only a limited number of directly relevant policies, in relation to the Development, the overall aims of the Strategy, and the Vision for Havant can be applied

- to the Development in terms of its contribution to the aims and objectives for the future of Havant.
- 5.2.6 As stated above, the purpose of the Development is to provide a reliable and flexible source of energy security for the Borough. The provision of this supply of energy for the overall vision for Havant will be valuable in ensuring that the policies listed in the Strategy are met.
- 5.2.7 Policy CS1 Health and Wellbeing, states that development will be supported which will retain or create additional open space or leisure facilities particularly in the Havant Thicket area. The Development is consistent with this objective in that it will provide additional energy resource to the Havant Thicket area to enable the expansion and improvement of the infrastructure and the creation of new facilities to support the strategies for health and wellbeing.
- 5.2.8 Policy CS2 Employment states that the Council will seek to accommodate flexibly a net total of 162,000 square metres of new employment floorspace between 2006 and 2026. Again, the Development is supportive of the policy in that the provision of a secure energy supply with flexibility, which is locally embedded, will serve to encourage smart economic growth and promote advances in information and communications technologies in the area.
- 5.2.9 Policy CS4 Town, District and Local Centre states that the Council will seek to accommodate approximately 13,000 square metres (net) of new comparison goods retail floorspace within town and district centres up to 2016. The Development is consistent with and supportive of the policy in that it will provide a local, and secure, reliable energy supply to support small and independent businesses. Whilst the move towards renewable technology progresses, the need for businesses to be confident about energy supply is vital to a growing local infrastructure and business community.
- 5.2.10 Under Policy CS6 Regeneration of the Borough, Havant and Waterlooville Town Centres are highlighted as areas for community support and regeneration. With the support of a reliable and flexible energy supply these communities will have the confidence to look towards renewable and sustainable development, working towards the overall strategy of the Borough. The Development is therefore supportive of the is therefore assists achievement of the aims of the policy.
- 5.2.11 Policy CS9 Housing states that new development is required to contribute to achieving a net total of 6,300 new dwellings between 2006 and 2026. This policy would be supported by the Development in that any new and developing infrastructure will require a secure energy supply. As mentioned above, the energy supply provided by the Peaking Power Generation Plant will provide flexibility but it will be embedded in the community for which it is designed reducing energy wastage across the grid and ensuring more efficient provision on power to new housing development in the area.
- 5.2.12 A primary objective of both the Sustainable Community Strategy Forward Together and the Core Strategy is the preservation and enhancement of the Borough's natural landscape, open space, its biodiversity and built heritage. Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough seeks to ensure that the key landscape and built form characteristics identified in the Havant Borough Townscape, Landscape and Seascape Character Assessment are protected and where possible enhanced by partnership working with developers, groups and the wider community. However, the Core Strategy recognises that the Council must still seek growth and appropriate development in order for the Borough to

become a vibrant place to live, providing opportunity and facilities for its residents. It recognises that it is vital to find a balance between these objectives without harming the natural and built environment, which forms the Borough's identity. In this context it is recognised that the Development will be in a rural location but also there are a number of ecological designations in the area including:

Blendworth Common Site of Interests for Nature Conservation;
Hazleton Common Local Nature Reserve (1.3km north east);
Chichester and Langstone Harbours Ramsar Site (5.1km south);
Chichester and Langstone Harbours Special Protection Area (5.1km south);
Solent Maritime Special Area of Conservation (5.1km south);
Langstone Harbour SSSI (5.1km south); and
Catherington Down SSSI (4.2km north west)

- 5.2.13 The Application is supported by a Preliminary Ecological Appraisal (included in Appendix 2) which concludes that whilst the Development will have a localised impact the limited land take is very small and is unlikely to have a functional or structural effect on local habitats species.
- 5.2.14 As far as the historic environment is concerned there are a number of Listed Buildings and Scheduled Monuments and whilst there may be some potential for buried archaeology the accompanying Heritage Desk Based Assessment included in Appendix 3 does not anticipate any significant impacts subject to the imposition of the appropriate conditions.
- 5.2.15 Policy CS13 Green Infrastructure states that development will be supported where it maintains and manages or enhances the network of green infrastructure identified at the sub regional and local levels and does not undermine the functional integrity of the green infrastructure. The Development is proposed in a 'green' area, however its size will not undermine the functional integrity of the infrastructure. The application is accompanied an Air Quality Assessment (Appendix 5) and Noise Assessment (Appendix 6) which confirm the acceptability of the Development in terms the need to support and maintain the environmental integrity of the Borough.
- 5.2.16 The Development also complies with Policy CS13 in that it will provide improved local services by the generation of flexible and secure electricity supply for the local community.
- 5.2.17 Policy CS14 Efficient Use of Resources states that development must provide adequate land or funding for waste management infrastructure and must locally contribute to the delivery of the PUSH target of 100MW of renewable energy by 2020 for the whole of the Partnership for Urban South Hampshire (PUSH) area. The Development is consistent with the objectives of the policy in that provides part of the essential infrastructure to support the wider use of renewable energy. Whilst the Development is not in itself renewable energy provision, it is recognised in the Government's Energy Security Strategy of 2012 as playing an important part in supporting its development. The development of Peaking Power Generation Plants is a supporting electricity generation technology that will ensure energy security at a local level, whilst greener, and renewable energy generation technologies, mature and become more mainstream.
- 5.2.18 The Development will also serve to enable the Borough to work towards the development and establishment of more low carbon methods of energy provision.

- 5.2.19 The Development is in compliance with Policy CS15 Flood and Coastal Erosion Risk in that it is not proposed within a Flood Risk Area, being in Flood Zone 1.
- 5.2.20 Policy CS19 Effective Provision of Infrastructure states that new development must make the most effective use of existing infrastructure, including opportunities for co-location of facilities. Development will be permitted if it ensures that new infrastructure supports the local economy, but also if it safeguards the requirements of infrastructure providers, in this case, energy provision. The purpose of the Development is to provide flexible and secure energy for the local community to support the growing infrastructure outlined in the Core Strategy, but also to assist in the Borough's work towards a more sustainable community. Therefore, the policy supports the Development.
- 5.2.21 Policy DM10 Pollution states that development that may cause pollution of water, air or soil or pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light, heat, electromagnetic radiation and other pollutants will only be permitted where relevant criteria can be met and outlines the limits of pollution that are acceptable for any development. The Development is a Peaking Power Generation Plant, which will be gas-fired, and operate only at times of high demand for power from the National Grid. This will make the impact upon the environment, as outlined in the policy, intermittent and minimal. The application is supported by Air Quality Assessment (Appendix 5) and Noise Assessment (Appendix 6).

Saved Policies of the East Hampshire Local Plan: Second Review (2006)

- 5.2.22 This is the adopted Local Plan for East Hampshire, from which there are potentially still some relevant saved policies these include the following of which Policy UI1 is potentially of the most relevance, which is concerned with ensuring that utility related development in the countryside is environmentally acceptable.
- 5.2.23 Policy C6 Tree Preservation, Forestry Operations, Management Plans states that planning permission will not be granted for development that would damage or destroy one or more trees protected by a tree preservation order or in a conservation area unless removal would be in the interests of good arboricultural practice. The proposal as submitted is consistent with the policy in that it demonstrates that the loss of trees will be kept to an absolute minimum and that additional planting is included to provide a mitigation buffer between the plant compound and the adjacent ancient woodland. No protected trees are impacted by the proposed development.
- 5.2.24 Policy HE17 Archaeology and Ancient Monuments and HE19 Ancient Tracks and Lanes; state that development will not be permitted which adversely affects important archaeological sites, buildings, monuments or features, whether scheduled or not, or their settings. As stated above, a Heritage Desk Based Assessment is included in Appendix 3 which provides an evaluation of the impact on the historic environment.
- 5.2.28 Policy E2 Renewable Energy, Pollution, Safeguarding General Amenity states that planning permission will be granted for development for the generation of electricity from renewable resource subject to a number of caveats including careful design of equipment to minimise impact on the street scene and consideration of highway safety during construction and operational phases of the development. The development of Peaking Power Generation Plants is a supporting electricity generation technology that will ensure energy security at a local level, whilst greener, and renewable energy generation technologies, mature and become more

mainstream. The environmental impacts have been fully assessed in the supporting assessments included in the Appendices to this Statement.

- 5.2.29 Policy IB3 Industrial and Business Development in the Countryside safeguards the open countryside by directing new businesses to previously developed locations and also requires that business uses in the countryside do not lead to an over intensification of the use of a site, maintain the rural character of the location, preserve local amenities and do not lead to excessive car use. The proposed peaking power station with the additional mitigation planting proposed and the very low levels of access required on an annual basis is fully compliant with the requirements of this policy.
- 5.2.30 Policy UI1 New Utility Infrastructure in the Countryside. The development of new utility infrastructure will be permitted provided that it is environmentally acceptable, preserves local amenity, ameliorates any environmental impacts and generates low levels of traffic. As stated above the environmental impacts have been fully assessed in the supporting assessments included in the Appendices to this Statement.

East Hampshire District Council Local Plan Joint Core Strategy (May 2014)

- 5.2.31 The Core Strategy forms Part 1 of the emerging Local Plan that will replace the old 2006 Local Plan and was completed May 2014. This sets the planning strategy for the area of East Hampshire to 2028. Most significant in this are the policies on the Natural and Built Environment and Transport which include the following:
- 5.2.32 CP19 Development in the Countryside which states that the approach to sustainable development in the countryside, defined as the area outside settlement policy boundaries, is to operate a policy of general restraint in order to protect the countryside for its own sake. The only development allowed in the countryside will be that with a genuine and proven need for a countryside location, such as that necessary for farming, forestry, or other rural enterprises (see Policy CP6). Within the South Downs National Park the pursuit of National Park purposes will be paramount. The proposed development supports this policy in that the location of the Peaking Power Generation Plant must be in close proximity to both suitable gas and electricity connections which are only available in limited, often rural locations.
- 5.2.33 CP20 Landscape states that the special characteristics of the district's natural environment will be conserved and enhanced. This is particularly relevant in respect of the South Downs National Park. This proposal supports this policy in that the proposed plant will have no adverse impact on the neighbouring ancient woodland, and will enhance the ecology of the area through the use of appropriate species in the substantial mitigation planting proposed to screen the Development.
- 5.2.34 CP25 Flood Risk states that development in areas at risk of flooding, now and in the future, as identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment will be permitted provided that it meets the sequential and exception test (where required) as outlined in Government guidance and that it can be demonstrated that there is no net increase in surface water run-off. A Flood Risk Assessment is included in Appendix 4 which includes details of surface water run-off rates.
- 5.2.35 CP27 Pollution states that Development must not result in pollution which prejudices the health and safety of communities and their environments. Developments that may cause pollution, and developments sensitive to pollution, will only be permitted if they are

appropriately separated and designed to remove the risk of unacceptable impacts. Engineering or administrative controls may be required to provide sufficient protection to focus on reducing pollution at source. As stated above the proposed development is a Peaking Power Generation Plant, which will be gas-fired, and operational only at times of high demand for power from the National Grid. This will make the impact upon the environment, as outlined in the policy, intermittent and minimal. The application is supported by Air Quality Assessment (Appendix 5) and Noise Assessment (Appendix 6).

- 5.2.36 CP28 Green Infrastructure states that development will be permitted provided that it maintains, manages and enhances the network of new and existing green infrastructure. Development will need to take forward the objectives and priorities presented in the District's Green Infrastructure Study and Strategy, the South Hampshire Green Infrastructure Strategy and its Implementation Framework and the avoidance and mitigation measures set out in the Joint Core Strategy's Habitats Regulations Assessment. The Development is proposed in a 'green' area, however its size will not undermine the functional integrity of the infrastructure, and will be accompanied by ecology air quality and noise assessments in keeping with the need to support and maintain the environmental integrity of the District.

National Planning Policy

- 5.2.25 The National Planning Policy Framework (NPPF) is the UK Government's statement of planning policy in England, published in 2012. It identifies that the purpose of planning system is to contribute to the achievement of sustainable development (paragraphs 1-10), the pursuit of which it states, involves seeking positive improvements in the quality of the built, natural and historic environment, as well as people's quality of life.
- 5.2.26 It sets a presumption in favour of sustainable development (paragraph 15) under which development proposals which accord with the local authority's development plan should be approved without delay or where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless there are any adverse impacts of doing so that would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF.
- 5.2.27 The NPPF also sets out 12 'Core Planning Principles' (Paragraph 17) which its states should underpin decision making. These include supporting the transition to a low carbon future and encouraging the reuse of existing resources including renewable resources, by the development of renewable energy. It sets out policy under 13 headings including the following:
- Building a strong and competitive economy;
 - Promoting sustainable transport;
 - Requiring good design;
 - Promoting healthy communities;
 - Meeting the challenge of climate change, flooding and coastal change;
 - Conserving and enhancing the natural environment; and
 - Conserving and enhancing the historic environment.
- 5.2.28 It includes more detailed policies in relation to each of these headings including policy tests for the environmental impacts of the new development.

- 5.2.29 Appropriate supporting technical assessments in relation to the environment impacts of the Development relevant to these headings are included in the Appendices at the end of this Statement. These have informed the design of the plant, to ensure that appropriate mitigation, if required is included or built into the design.
- 5.2.30 The NPPF is silent on support for Peaking Power Generation Plants or gas fired power stations, although it expresses support for the development of renewable energy.
- 5.2.31 In addition to the NPPF, the Government has also published a series of National Policy Statements (NPSs) which are primarily intended to provide a supportive policy context for major energy development proposals (over 50MWe) being promoted through the consenting regime for Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008. These include Overarching National Planning Statement (NPS) For Energy (EN-1) July 2011, which is concerned with energy security whilst moving away from dependency on fossil fuels. It recognises that there are benefits in having a diverse mix of all types of power generation and makes clear that the UK should not be dependent on any one type of generation or one source of fuel or power, thereby helping to ensure security of supply. In addition, it sets out how different types of electricity generation have different characteristics which can complement each other.
- 5.2.32 It recognises that fossil fuel generation can be brought on line quickly when there is high demand and shut down when demand is low, thus complementing generation from nuclear and intermittent generation from renewables. However, until such time as fossil fuel generation can effectively operate with Carbon Capture and Storage (CCS), it recognises that such power stations will not be low carbon and that the continued use of fossil fuel generating stations (including gas fired stations), contribute to security of energy supply by using fuel from a variety of suppliers and operating flexibly. It expressly acknowledges that gas will continue to play an important role in the electricity sector, providing vital flexibility to support an increasing amount of low-carbon generation and to maintain security of supply.
- 5.2.33 The Government's policy on Electricity Market Reform (EMR – White Paper of July 2011) was designed to ensure the delivery of reliable energy supplies at affordable prices whilst creating a market where renewables and low-carbon alternatives could compete with traditional methods of generation, and establishing a more sustainable and varied market.
- 5.2.34 The EMR initiated the Capacity Market (CM) Mechanism in 2014 which provides a regular retainer payment for reliable capacity generation at times of high demand (peak demand), thus ensuring energy security to 'keep the lights on'.
- 5.2.35 In the context of national policy there is a clear and demonstrable need for Peaking Power Generation Plants of the kind proposed at Blendworth.

5.3 Summary

- 5.3.1 The Development Plans for HBC and EHDC included strategic objectives and detailed policies designed to protect and enhance the areas of the two Councils. The proposal as demonstrated in the attached assessments does not present any significant issues in terms of its environmental impacts and the applicable development plans or the overall strategies of the Councils.
- 5.3.2 The Government's emphasis and support for energy security in the form of Peaking Power Generation Plants (peaking power) is set out in Overarching National Planning Statement (NPS)

For Energy (EN-1). The proposal not only contributes to the security of the energy supply for the future, but also serves to support local renewable energy projects, consistent with Havant Borough Council's aims to meet its obligations under national and local carbon reduction initiatives.

- 5.3.3 The Development is in accord with the Development Plan Policies of HBC and EHDC, in terms of land use, design, amenity, and use of existing industrial land. There is significant benefit from the establishment of a Peaking Power Generation Plant in this location, demonstrating that the Development complies with local development plan and national planning policy.

Appendix 1 Landscape and Visual Assessment

Appendix 2 Preliminary Ecological Appraisal

Appendix 3 Heritage Desk Based Assessment

Appendix 4 Flood Risk Assessment

Appendix 5 Transport Statement

Appendix 6 Air Quality Assessment

Appendix 7 Noise Assessment

