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Dear Sir/Madam

**FULL PLANNING APPLICATION (CHANGE OF USE) – SGN BIO-METHANE INJECTION FACILITY, FARLINGTON REDOUBT, PORTSDOWN HILL ROAD, HAVANT, PO6 1BW**

On behalf of our client, Southern Gas Networks ('SGN'), we submit a full planning application seeking a change of use to allow third party operators to inject bio-methane into the gas network at the Portsdown Hill bio-methane facility. A change of use application is submitted as the proposal seeks to marginally intensify the existing use of the facility.

The application is submitted following pre-application advice with Havant Borough Council ('the Council') in August and October 2019, which concluded that the Proposed Development is acceptable in principle subject to the assessment and further requirements which are included as part of the application.

This planning cover letter is submitted with the following documents:

- Planning application forms;
- CIL form;
- Site Location Plan;
- Site Layout Plan;
- Site photos;
- Transport Statement, prepared by Glanville;
- Heritage Assessment, prepared by Archaeology Collective;
- Air Quality Assessment, prepared by Air Quality Consultants;
- Preliminary Ecological Appraisal, prepared by CT Ecology; and
- Technical Summary, prepared by SGN.

The application fee of £462 has been paid via the Planning Portal.

**Site and Surroundings**

The Portsdown Hill Pressure Reduction Station (PRS) is located to the north of Portsdown Hill Road and is situated within the jurisdiction of Havant Borough Council. Portsdown Hill Road, and the junction which provides access to the site is located within the jurisdiction of Portsmouth City Council.

The 0.25ha bio-methane injection element of the facility, which this application relates to, is located in the northern part of the wider PRS site and is hereafter referred to as “the Site”.

A recycling and processing plant operated by L&S Waste Management is located to the east of the Site with paddocks beyond.

The Site and L&S Waste Management are located within Farlington Redoubt, which is believed to have been built in the 1850s as part of a series of fortifications built to defend Portsmouth and its dockyards. Farlington Redoubt formed the eastern limit of a series of six forts along the ridge above Portsmouth.

The Redoubt is thought to have survived until after the Second World War before being excavated as a quarry. The last portions of the fort were demolished in the 1970s to make way for an underground storage facility for British Gas (now maintained by the Applicant, SGN).

The Site is not located within a conservation area but is approximately 750m east of the scheduled ancient monument of Fort Purbrook and associated listed buildings. Further information is set out in the supporting Heritage Statement.

The isolated location of the Site within the Farlington Redoubt escarpment, coupled with a surrounding belt of fields and trees, help to provide a visual and acoustic screen. The nearest residential property is located approximately 250m to the south east of the Site fronting the southern side of Portsdown Road.

The Proposals Map indicates that the Site is allocated in the Hampshire Minerals Waste Plan, whilst the land that borders Farlington Redoubt to the north and west is identified as a Site of Importance for Nature Conservation and an ‘uncertain site for brent geese and/or waders’. The Site is also within the 5600m buffer zones for the Solent SPA and Coast.

## **Planning History**

A review of the Council's planning portal does not reveal any relevant planning history on the Site. All applications available online relate to the adjacent L&S Waste Facility.

## **Planning Policy**

The Development Plan for Havant Borough comprises:

- Local Plan (Core Strategy) adopted March 2011; and
- Local Plan (Allocations) adopted July 2014.

The Council is currently preparing the Havant Borough Local Plan 2036 which will eventually supersede the existing Development Plan Documents set out above. At the time of this submission, ongoing evidence gathering was taking place to support the emerging plan and had not been submitted to the Secretary of State for examination. As a result, policies in the emerging Local Plan are afforded limited weight in line with NPPF Paragraph 48a.

The Site is not located within an area covered by a made or emerging Neighbourhood Plan.

## **Key Policy Considerations**

We consider that the key planning policy considerations for the proposed change of use are as follows:

- Principle of development;
- Sustainability and low carbon energy;

- Transport (vehicle movements);
- Heritage;
- Ecology;
- Air quality;
- Noise; and
- On-site substances.

Based on the key considerations list, we set out the relevant national and local planning policies relating to the application.

## National Policy

The revised National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's planning policies for England and how these are expected to be applied. We consider the following paragraphs are relevant to this proposal:

Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with an up-to-date development plan without delay.

Paragraph 102 requires transport issues to be considered from the earliest stages of development proposals so that (inter alia) the potential impacts on transport networks can be addressed, and the environmental impacts of traffic and transport can be identified, assessed and taken into account.

Paragraph 108 adds that applications for development should ensure appropriate opportunities have been taken up for the type of development and its location, provide safe and suitable access and effectively mitigate any significant impacts on the transport network.

Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 150 states that when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. They should approve the application if its impacts are acceptable.

Paragraph 180 states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site of the wider area to impacts that could arise from the development.

Paragraph 181 adds that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants. Opportunities to improve air quality or mitigate impacts should be identified.

Paragraph 175 requires local planning authorities to apply a series of principles to applications which may impact on biodiversity. These include refusing permission if significant harm cannot be avoided, adequately mitigated or compensated for.

Paragraph 189 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting.

## Local Plan (Core Strategy) 2011

Policy CS11 (*Protecting and Enhancing the Special Environmental and Heritage of Havant Borough*) states that planning permission will be granted for development that (inter alia) protects the Borough's statutory and non-statutory designated landscape, habitats and features; has regard to hierarchy of nature conservation designations; supports; protects and enhances statutory and non-statutory heritage designations; and protects wildlife habitats and wildlife corridors to prevent the fragmentation of existing habitats.

Policy CS19 (*Effective Provision of Infrastructure*) permits development where (inter alia) it ensures that it makes the most effective use of existing infrastructure and safeguards the requirements of infrastructure providers relating to high pressure gas mains, for example.

Policy CS20 (*Transport and Access Strategy*) will permit development where it (inter alia) does not increase congestion and promotes better use of existing transport networks and provides transport management measures to ensure the safe and efficient operation of the strategic and local road network.

Policy DM8 (*Conservation, Protection and Enhancement of Existing Natural Features*) states development will only be permitted where it protects and enhances local habitat and landscape distinctiveness.

Policy DM10 (*Pollution*) states that development that may cause pollution will only be permitted where relevant criteria can be met including the health and safety of existing and future users, or nearby occupiers/residents is not put at risk and national air quality standards would not be breached.

Policy DM12 (*Mitigating the Impacts of Travel*) requires new development to mitigate their travel impact, including environmental impacts of travel and impacts on amenity, health and climate change by (inter alia) the submission of a transport statement to explain changes in travel demand.

## Local Plan (Allocations) 2014

Policy DM18 (*Protecting New Development from Pollution*) states that planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have a significant negative affect on the amenity of future occupiers or users of the proposed development.

Policy DM20 (*Historic Assets*) requires applications that affect, or have the potential to affect, heritage assets provide a Heritage Statement that describes the significance of the asset(s) and set out the impact of the development on the heritage assets and mitigation that is proportionate.

Policy DM23 (*Sites for Brent Geese and Waders*) states that planning permission will be granted for developments that avoid important sites for brent geese and/or waders outside of the statutory designated areas. Planning permission will be granted outside of the statutory designated areas, where appropriate surveys are undertaken, and it is determined that the site has no importance.

## **Planning Assessment**

### Principle of Development

The Portsdown Hill Pressure Reduction Station (PRS), immediately south of the Site, was built in the early 1970's and has undergone various modifications since the original development.

The bio-methane injection facility was constructed in 2014 in accordance with the Town & Country Planning (General Permitted Development) (England) Order 2015 Class A, Part 15 in relation to power related development for gas transporters. This permits statutory undertakers to erect apparatus and carry out development in, on, over or under the operational land of the gas transporter.

The erection of apparatus, the transportation and injection of bio-methane into the Portsdown Hill facility by SGN employees is therefore considered permitted development. However, the General Permitted Development Order (GPDO) does not permit third party operators to inject bio-methane into gas transporters as they are not considered as statutory undertakers.

SGN is therefore seeking planning permission to extend the right to third party operators to undertake this operation alongside the statutory undertaker. The application is being submitted as a change of use as it constitutes a marginal intensification of the existing operation.

The Site was chosen as the best location for the bio-methane injection project in 2012 because it benefits from good vehicular access, is shared with another commercial operator, benefits from extensive screening, has sufficient capacity to take the flow of gas, provides SGN access to a large domestic market and presents the most central location for the bio-methane production sites that were being planned at the time of construction.

Given that the Portsdown Hill bio-methane injection facility already exists, the principle of development through a marginal intensification of the existing use is considered acceptable in planning terms. The Site makes the most effective use of existing infrastructure and safeguards the requirements of infrastructure providers as required by Local Plan Policy CS19.

## Sustainability and Low Carbon Development

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. Further information on the production is set out in the supporting Technical Summary, prepared by SGN.

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 AL1.

## Transport

The application is supported by a Transport Statement, prepared by Glanville. It confirms that that the number of HGVs serving the Site will increase by up to 15 from 5 to 20 a day equating to an additional 105 HGVs per week.

Automatic traffic counters were installed at the site access and on Portsdown Hill Road for a period of seven days. The data collected identified that the road was used by an average of 790 HGVs equating to 0.8% of the total vehicle flow. An average of 132 HGVs were recorded along the access road equating to 27.6% of total vehicle flow; the majority of which serve the adjacent waste facility.

The modest increase in HGV activity along Portsdown Hill Road and the access road will equate to 0.8% and 4.3%, respectively.

Based on the findings, the proposals will not have a detrimental impact on highway safety and the transport impacts cannot be regarded as severe. The proposal is therefore in accordance with NPPF paragraphs 102, 108 and 109 and Local Plan Policy CS20.

## Heritage

This planning application is supported by a Heritage Statement, prepared by Archaeology Collective. The document has assessed the impact the development will have on several listed buildings and scheduled monuments, including Fort Purbrook.

The Heritage Statement concludes that the proposed change of use will not change or alter the scheduled monument of Fort Purbrook's physical surroundings or the experience of the asset. There will be no ground moving activities associated with the change of use therefore the scheduled monument will not be physically harmed, and the footprint of Farlington Redoubt will not be changed or altered.

Due to distance, topography and intervening tree lines, there will be no harm to the significance of any heritage asset assessed as a result of the proposed change of use.

Based on this detailed assessment, the proposal accords with the requirements of NPPF Paragraph 189, and Policies CS11 and DM20.

## Ecology

The application is supported by a Preliminary Ecological Appraisal (PEA), prepared by CT Ecology. The PEA concludes that a number of factors serve to reduce any likely significant impacts the proposals may have on ecological receptors in the wider landscape.

These include the proposed low level of use within the bio-methane facility compared to current activity levels associated with the adjacent waste management site; the location of the facility within an escarpment which serves to create a buffer between the Site and the wider landscape; the distance of the Site from areas of semi-natural habitat including designated sites; together with the low number of records of waders from potentially suitable habitat within 150m of the Site.

Based on the baseline conditions supported, protected species do not pose any constraints to works and further surveys in relation to protected species are not required. It is considered that the effects on qualifying species of the Special Area of Conservation (SAC) from noise and emissions as a result of the proposals are not significant and therefore further assessment in the form of a Screening Opinion or Habitats Regulations Assessment is not considered necessary.

On this basis, the proposal is considered to accord with NPPF Paragraph 175 and Policies CS11, DM8 and DM23.

## Air Quality

An Air Quality Assessment, prepared by AQ Consultants, is submitted with the application. It confirms that the increase in vehicle movements will be well below published screening criteria and will therefore not have an adverse effect on air quality conditions. The overall operational air quality effects of the modest increase in vehicles are judged to be 'not significant'.

The results of the Air Quality Assessment demonstrate that the proposal accords with NPPF Paragraphs 180 and 181 and Local Plan Policies DM10 and DM18.

## Noise

Given the Site's relatively isolated location within an escarpment, and distance from residential properties (nearest approximately 250m to the south of Portsdown Hill Road), noise from the Site is not considered to have an impact on residential amenity. The Technical Summary notes that the PRS has been operating from the Site for nearly 50 years and SGN have never received a noise complaint.

Based on the modest increase in vehicle movements, which remains identical to pre-application discussions, the proposal is not considered to cause any significant impact on residential amenity. During the pre-application process, the Planning Officer also drew the same conclusions. In addition, the Environmental Health Officer did not raise any objection in their pre-application consultation response.

The proposal is therefore considered to accord with NPPF Paragraph 180 and Local Plan Policies CS16(1E), DM10 and DM12.

## On-site Substances

SGN have confirmed that the maximum amount of compressed gas allowed on site at any given time is less than 15 tonnes. The trailers download at a rate of 1000m<sup>3</sup>/h or approximately 1 tonne per hour. Logistics are coordinated with SGN's customers to ensure that trailers are not waiting at the gate for access.

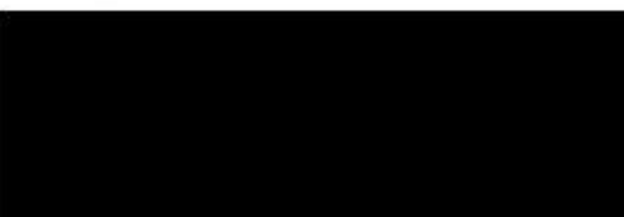
In addition to the trailers containing gas to be downloaded into the network, three chromatographic buildings are located on the site, each containing 3 x 200 litre bottles of helium. Stenching agent (odorant) is also stored on site, which is used to add smell to the gas to enable detection. These additional chemicals are noted for reference as they are not options that can be selected on the planning application forms.

## **Conclusions**

Based on the modest intensification of the use of the Site to permit third party operators to inject bio-methane into the existing facility, we consider that the proposal accords with the Development Plan as outlined above.

We trust that the application submission includes all details requested during the pre-application discussions and will allow you to register and validate it in due course. Should you have any queries regarding the proposal, please do not hesitate to contact me.

Yours faithfully,



Ross Brereton MRTPI  
Associate