

Parham Parish Council

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To Suffolk Coastal District Council Planning Department

Recommendation DC/17/1407/FUL Rapid Response Embedded Power Plant

At a full council meeting on 09/05/2017 Parham Parish Council unanimously voted to recommend to Suffolk Coastal District Council that the planning application DC/17/1407/FUL for a Rapid Response Embedded Power Plant in Hacheston should be rejected. Parham Parish Council objects to this application.

If Suffolk Coastal District Council does not reject the proposal in the first instance then it is strongly requested that the application be referred to the Planning Committee and that an Environmental Impact Assessment is required of the developers. Noise and emissions assessments to the same standard as an EIA are requested if an EIA requirement is not made.

Environmental Impact Assessment Required

It is requested that the developer is required to undertake an Environmental Impact Assessment for the following reasons:

1. The proposed development is likely to have significant effects upon the environment, particularly levels of noise, visual effects, air quality and the natural environment.
2. Insofar as the aim of an Environmental Impact Assessment is also to ensure that the public are given early and effective opportunities to participate in decision-making procedures and while this has not been done the residents of Parham have not had this opportunity.
3. It is not clear that the information so far provided by Noriker Power Ltd. is sufficient to assess potential impacts fully or accurately.

4. It is noted that the recommended area used to trigger an EIA is 5000sqm and that the application presents a plot of very slightly less than that, 4958sqm. That the area is very slightly less than the threshold under the 10(b) Urban Development Projects of Schedule 2 of the EIA Regulations indicates that the developer has intentionally designed the area at 4958sqm in order to avoid the necessity of an EIA. Dr. Thomas of Noriker Power Ltd. was clear in the Hacheston Parish Council meeting of 08/05/2017 that this is the case and stated that the reason is one of timing in that such an assessment would take 16 weeks but that the National Grid has a problem of energy frequency balancing that needs to be solved as soon as possible, and that the contract had been started.
5. Schedule 2 of the EIA Regulations s3(e)(i) (Energy industry) states that for the surface storage of fossil fuels a criterion is that “The area of any new building, deposit or structure exceeds 500 square meters”. The total area of the structure of the proposed plant likely exceeds 500 sqm.
6. In the HPC meeting of 08/05/2017 Dr. Thomas from Noriker Power Ltd. publically undertook to carry out an EIA after planning permission was received. Parham Parish Council believes that it must be carried out prior to the granting of planning permission.
7. The site is immediately adjacent to an area recognised for its UK Biodiversity Action Plan species. The site could have a potentially significant impact on the species in this area.
8. The site is within a Special Landscape Area. Thus a precautionary approach is required to ensure that a material detriment does not arise which might detract from the special landscape quality of the area.
9. Being that previous appeal decisions and planning inquiry reports are considered to be a Material Planning Consideration, the EIA assessment for a former unrelated but comparable application DC/16/2190/EIA on the same plot of land should be taken into account in respect of this application. Many aspects of the proposal are similar. It concluded:

“It is likely the development will have a significant impact on the environment in terms of its visual impact and the setting of the listed building. Concerns are raised about the amount of impact on ecological species in the area, within the site and adjacent to it.”

Planning Application DC/17/1407/FUL for a Rapid Response Embedded Power Plant should be rejected for the following reasons:

1. Noise Pollution:

A Noise Impact Assessment has not been carried out:

A full noise impact assessment based on BS4142: 2014, which rates the impact of noise on residential receptors, must be required from the developer. Discussion of the impact of noise in the planning application design and access statement is not detailed enough:

- DEFRA figures are not sufficient for determining noise levels produced by this particular system.
- In particular, no data is provided for the 1/3 octave band frequency to identify tonal components. Particular frequencies emitted may be more noticeable than the overall noise.
- Noise assessments need to be produced for the various modes of operation: start-up, running modes such as electricity generation, and shut down.
- The design of the acoustic barriers is dependent upon the noise impact and therefore an assessment needs to be made to ensure such designs do in reality mitigate that impact. Hence further details need to be presented about the acoustic barriers and noise mitigation measures.

Previous Negative Community Experiences;

The key problem here is that previous applications for development in this area have made promises that have not been kept or borne out by the reality of projects once developed:

- **Electricity substation:** developers stated that there would be no noise, and yet a low-level hum noise of 22 dBA was emitted. Residents living near the substation had to implement mitigation measures paid for by UK Power Networks. Noise at 400m would be 26 dBA for this power plant.
- **Biomass plant:** it was said that there would be no odour. There is odour. Noriker Power Ltd. has offered to rectify any noise production.

- **Power Station Background Noise levels:** Currently the effect of the acoustic barrier is to reduce the noise level at 280m by 8.7 dBA (reducing the noise level by nearly half) to 31 dBA. However, this is still about 10 dBA above background noise levels, that is, it is twice as loud.

It is requested that SCDC requires the applicant to demonstrate that the noise impact is 10 dBA below prevailing background sound levels, and that background noise levels are not increased as a result of the development, and that a full noise assessment is carried out under BS4142: 2014.

2. The Impact on Air Quality, Use of Diesel and Pollution:

While the use of only 8 MW of carbon-based diesel generation will be used to manage 1000 MW of renewable energy generation, the use of diesel does present particular problems:

Current pollution: the developers have determined no baseline level of air quality. It is important to recognise that the perception of Parham residents is that the village already has a problem with exhaust pollution because:

- The volume of traffic has increased substantially in recent years.
- Many polluting heavy construction and agricultural vehicles use the B1116.
- Parham is in a valley; on cold winter nights fumes hang around and do not get blown away.

Additional pollution: The power plant proposed would exacerbate this pollution problem.

- Developments perceived to exacerbate a difficult problem would not be met with enthusiasm.
- The worry is that fumes will rise initially on cold winter evenings but due to the well-known Suffolk mist phenomenon would fall back down into the valley and materially affect residents.
- The prevailing wind from the SW will blow pollutants towards Parham.

- Modeling needs to be undertaken to establish likely effects from emissions.

Air quality and diesel: There are numerous recent reports in the media of the detrimental effects of the use of diesel engines on air quality and human health with figures in the tens of thousands of deaths in the UK. The High Court has required the Government to publish its strategy to tackle air pollution, since the application was made. National concerns must translate to local issues.

Nano-particles: Recent scientific research has shown that Nano-particles in diesel engine exhaust can cross cell membranes between the lungs and the circulatory system, presenting a health risk.

It is requested that SCDC requires a full assessment of the potential reduction in air quality in Parham and Hacheston.

3. Impacts and issues:

- **Visual Impact within Special Landscape Area:** Mitigation measures to be implemented by Noriker Power Ltd. for visual impact are reasonable and potentially effective, when seen from ground level. There may be a visual impact on Parham Old Hall in that the site could be viewable from one or more upper windows of the property.
- **Heritage Assets:** The embedded power station would be in relatively close proximity to a Grade 2 listed property, Parham Old Hall, which may suffer from noise and some visual impact. It will also be visible from the Grade 2* Moat Hall.
- **Smell:** Fumes will produce odours that will materially affect residents due to the particular topography and climatic conditions in Parham and Hacheston.
- **Loss of Agricultural Land:** The development would result in the loss of grade 3 agricultural land.
- **Fire Hazard:** There may be a risk of storing hazardous materials, in particular a fire hazard.
- **Construction:** There is concern regarding the total number of HGVs using the B1116

over the construction period (~100) as a short-term consequence, each bringing its own noise and pollution.

- **Mitigation Planting:** There is to be some mitigation planting around the site. HPC would look for this to be guaranteed throughout the life of the plant, and to be effective in all seasons.
- **Conditions for Use:** These need to be set so that it is not possible for diesel generation to be used for more than 750 hours per year. A worry for residents is that there is nothing to stop continuous use if Noriker (or a future owner) chooses to do so.
- **The Scale of Operation:** is significant and the plant appears to be quite large with 16 diesel engines comparable to 16 heavy goods vehicle engines. This is too big for the site and situation.

Further Observations

1. Consultation

None of the local properties directly affected by the proposed development have been consulted directly, either by Noriker Power Ltd. or by SCDC and yet some of these properties are actually mentioned in the main application document. HPC advised the SCDC of this omission on 16/06/2016 in its submission regarding DC/16/2190 – however Hacheston Parish Councils valid concern about this has not been acted upon.

PCC were particularly concerned that they were not originally directly informed officially about this proposal even though the property closest to the site (Parham Old Hall) is in Parham and the proposed development will materially affect Parham residents.

Parham Parish Council strongly requests that SCDC consults residents directly affected, even if their properties do not directly abut the planning application site.

2. Quality of Information Provided

Accuracy: Some information presented in the application is clearly incorrect. “The Parham Old Hall is ... now owned by the Gray family known as Moat Hall.” S2.2 (p17) Therefore there is a question as to whether other information in the application is accurate. We question whether there has been a site visit by Noriker Power Ltd. representatives to the intended plot.

Detail: The information presented is not detailed enough for PPC to make a decision recommending that the application be permitted.

Veracity: Previous acoustic research for related developments (by UK Power Networks) at this particular site has been proved to be incorrect. How can Parham and Hacheston residents be sure that Noriker Power's research is accurate?

Specificity: Some of the data presented is generic and not based on essential measurements at the site itself. Other than an Ecological Appraisal, relevant studies such as a noise impact assessment or effects of emissions have not been undertaken.

Parham Parish Council would like to thank: Suffolk Coastal District Council for extending the period of consultation. Noriker Power Ltd. and its representatives Dr. Marc Thomas and Ben Guest for visiting Hacheston to present its proposals to Hacheston councilors and Hacheston and Parham residents, The clerk of Hacheston Parish Council, Bartholomew Hall