

Our ref: General/40b – Planning Conformity/Final Response/Doncaster Combined Generating Plant, Stainforth April 08

25 April 2008

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Dear Arthur

**Application reference: 08/01033/CON**

**Application for an extension to previous 430MW consent to construct and operate a 900MW gas (CCGT) and coal integrated gasification combined cycle (IGCC) generating plant at Hatfield Power Park, Stainforth, Doncaster.**

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

Please note that the Secretary of State's Proposed Changes to Draft RSS have now been published (September 2007). Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State".

Assembly responses to consultations on strategic applications will therefore have to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs and application Inquiries. At the same time, it should be noted that the Assembly itself has made comments on the Proposed Changes and that the final version of the new RSS is expected in spring 2008.

Both the existing and draft regional spatial strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

In seeking the implementation of these policies across the region, the Assembly therefore offers the following comments on the proposed 900MW Power Generation Station.

#### *Regional Policy Context*

Policies in the current RSS (December 2004) seek to focus development on the region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example, policies P1, S4, E1, SOC3, T1, T2).

Policies in draft RSS (December 2005) build on these principles. The Core Approach (Policies YH1 – YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional and Sub-Regional Centres and that away from these sufficient development should be permitted in Principal Service Centres to enable them to fulfil their role as service centres (Policy YH8 building on policies YH5, YH6 and YH7 and Policies E2 and T1).

Both current and draft RSS discourage development of Greenfield land, and state that priority should in fact be given to the re-use of Brownfield sites within settlements. Second priority should be given to other suitable infill opportunities, and thirdly, to planned growth areas. The proposed site is on Greenfield land.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes.

#### *Location of Development*

Policy YH3 relates to the key spatial priorities and provides all plans, strategies, major investment decisions and programmes in the Region will aim to transform economic, environmental and social conditions in the older industrialised parts of South Yorkshire and the Humber. The Secretary of State's Proposed Changes to draft RSS (2007) provides for the transformation of economic, environmental and social conditions in the Regeneration Priority Areas in the older industrialised parts of South Yorkshire in Policy YH1.

#### *Economic Considerations*

Policy E1 of draft RSS (2005) states that in order to create a more successful and competitive regional economy, all plans, strategies, major investment decisions and programmes in the Region will aim to promote opportunities for business relating to the Region's unique environmental assets and challenges, including sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the 'low carbon economy'.

#### *Clean Coal Development*

Policy R12 of current RSS (2004) and Policy ENV5 of draft RSS (2005) states that development plans should support the use of fossil fuel power stations which incorporate clean coal technologies or significant abatement measures in order for the Region to improve its energy efficiency. The Secretary of State's Proposed Changes to draft RSS (2007) supports the use of clean coal technologies and abatement measures.

The Regional Energy Infrastructure Strategy (November 2006) has three key objectives:

- Lead the way in delivering secure regional and national energy supplies;
- Promote the reduction in energy demand through efficiency in supply and transmission;
- Maximise low carbon energy generation.

Clean coal power stations through the adoption of Carbon Capture and Storage technology and the delivery of advanced gasification and supercritical boiler systems are one of the primary developments that the Regional Energy Forum is promoting.

Policy YH2 provides for all plans, strategies, investment decisions and programmes in the Region to help meet the Region's target to reduce greenhouse gas emissions by at least 20% below 1990 levels by 2010 and 25% below 1990 levels by 2015 by increasing renewable energy capacity and carbon capture. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) remove these targets; however the emphasis on increasing renewable energy and carbon capture has remained unchanged.

The site has a long term supply of good quality Hatfield Colliery coal from which to produce the Synthetic gas (SYNGAS), which therefore avoids the need for the order of 2 million tonnes per annum of coal being transported by either rail or road to traditional coal-burning stations in the region. This will help to reduce carbon emissions in the long term.

### *Renewable Energy*

The sustainable use of resources is a key theme in both current and draft RSS. Policy P6 of current RSS (2004) encourages new development to maximise energy efficiency and minimise resource demand. Policy ENV5 of draft RSS (2005) requires at least 10% of energy to be used in sizable new development is to come from on-site renewable energy sources. The Secretary of State's Proposed Changes to draft RSS (2007) removes this threshold, recommending that local authorities set their own proportions of the amount of energy to come from local renewable sources. However, the proposal is for a fossil fuel power generation plant so will therefore not be able to produce 10% on-site renewable energy. Although, the proposed plant does have the potential for Combined Heat and Power providing that there is adjoining development that can take advantage of it.

Policies in both current and draft RSS seek to promote opportunities for Combined Heat and Power plants. Policy ENV5 of draft RSS (2005) provides for the Region to improve energy efficiency and increase installed renewable energy capacity to at least 708 MW by 2010 and to 1862 MW by 2021. This will be achieved through maximising the use of combined heat and power systems, especially by the development with considerable energy demands. The Secretary of State's Proposed Changes to draft RSS (2007) states that to reduce green house gas emissions, improve energy efficiency and maximise the efficient use of power this will be achieved through maximising the use of combined heat and power, particularly for developments with energy demands over 2 MW, and using renewable sources of energy where possible. The information provided by the applicant states that the proposed Power Station will have the potential to provide Combined Heat and Power (CHP). However, it is not clear at this point whether there are significant adjoining developments that can take advantage of the potential CHP.

### *Environment*

The Thorne and Hatfield Moors Special Areas of Conservation (SAC) sites lie within 10km of the proposed development and therefore may be impacted from emissions from the facility. Policy ENV10 of the draft RSS (2005) states that the Region will safeguard and enhance landscapes that contributes to the distinctive character of the Yorkshire and the Humber. Policy ENV9 relates to the Cultural Heritage and seeks to safeguard and enhance the historic environment. It aims to conserve distinctive elements of the historic environment and enhance local character and distinctiveness including Industrial landscapes, housing areas and civic buildings, especially in West and South Yorkshire.

Policy ENV8 of draft RSS (2005) states that the Region will safeguard and enhance biodiversity and geological heritage, and ensure that the natural environment functions as an integrated network of habitats. It is therefore essential that the local authority carries out an Appropriate Assessment to determine that the

development can be accommodated without affecting the integrity of the Thorne and Hatfield Moor SAC.

At present it is not clear whether or not the applicant has provided sufficient information for such an Appropriate Assessment to be carried out. The Assembly can therefore only offer its support in principle on the understanding that the local authority ensure that this information is made available and that the subsequent Appropriate Assessment shows that the development will not adversely affect the integrity of the Thorne and Hatfield Moor SAC.

Policy ENV1 of draft RSS (2005) provides for the Region to safeguard water resources and encourage water efficiency. Development strategies, plans and decisions will maximise water efficiency measures, and in particular minimise development that consumes large quantities of water at the Sherwood Sandstone aquifer in Doncaster. The Secretary of State's Proposed Changes to draft RSS (2007) states that plans, strategies, investment decisions and programmes should maximise water efficiency methods, and in particular avoid depleting the Sherwood Sandstone aquifer in Doncaster.

It has been brought our attention that the original application for a 400MW plant had an abstraction licence for 30ml/d. However this revised application will require 50ml/d which will mean that the catchment will be over abstracted. This is a matter for the local authority to discuss with the Environment Agency.

#### *Accessibility*

Accessibility criteria are set out in both the current and draft RSS (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS). These tables include acceptable walking and overall journey times for the population that would be travelling to the site. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

It is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

#### *Car Parking*

Policy T2 of the draft RSS states that the maximum parking standards for new developments must be in line with Table 16.5. There is not sufficient detail provided with the application to assess whether this be the case.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

### **Conclusion**

Given the issues set out above, the Assembly offers the following comments that:

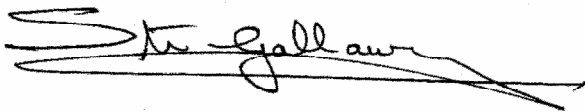
- The Assembly SUPPORTS the application, on the basis that it will help to reduce greenhouse gas emissions in the long term.
- However, this support is conditional on the local authority having sufficient information to carry out an Appropriate Assessment and that this Appropriate Assessment determines that the development can be

accommodated without affecting the integrity of the Thorne and Hatfield Moor SAC.

- The Assembly does recognise that the provision of fossil fuel power generation is a contentious issue but the proposal is seen as an opportunity to reduce carbon dioxide emissions through the replacement of traditional inefficient fossil fuel methods.
- The Assembly recognises that Policy ENV5 does state that a proportion of the energy to be used in the development should come from on-site renewable energy sources (bearing in mind the 10% figure quoted in the Proposed Changes to draft RSS). The proposal is for a fossil fuel power generation plant so will therefore not be able to produce 10% on-site renewable energy. However, the proposed plant does have the potential for Combined Heat and Power providing that there is adjoining development that can take advantage of it.
- Parking standards should be in line with current and draft RSS.
- The local authority should ensure that the development is in line with Policy ENV8, ENV9 and ENV10 of draft RSS (2005).

If you have any queries about these points, please do not hesitate to contact Andy Haigh on 01924 331601.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Stephen Galloway  
Chair, Regional Planning Board  
Yorkshire and Humber Assembly