

North Lincolnshire Council answers to the Examining Authority's further written questions (24 October 2019) for the VPI Immingham OCGT Project

Question 2.1.2 – Cultural Heritage

Please state whether the changes proposed by the Applicant to the Framework WSI address the concerns raised by NLC in the Local Impact Report (in so far as they relate to cultural heritage matters).

Answer

NLC is satisfied that the updated WSI received on 3 October 2019 satisfactorily addresses the concerns raised in the Local Impact Report in respect of cultural heritage. It is noted that the updated WSI does not appear to have been added to the document library and this response is based on the document sent direct to NLC by the applicant on 3 October 2019.

Question 2.4.1 – Operational Noise

Please comment on the proposed revisions to R19 of the revised dDCO [REP3-003] in relation to operational noise.

Answer

NLC still has concerns with regards to operational noise, which remain the same as those raised during the Issue Specific Hearing (ISH) on Environmental Matters held at 10am on 3 October 2019.

Figures provided in Table 8.16 of Chapter 8 (Noise and Vibration) of the submitted Environmental Statement demonstrate that operational noise levels of 1dB above background as a rating level at the nearest residential receptor can be achieved. Therefore NLC are unsure why a limit of +5dB above background is required.

The applicant has presented a similar approach in support of the +5dB requirement used at another generating station DCO recently granted. However, the background levels for that development site have not been supplied, equally the distance between the power station and the nearest residential/noise sensitive receptor has not been provided. It is not therefore possible for NLC to ascertain the similarity between the two developments/sites.

The developer has quoted from BS4142: 2014 stating that +5dB is a minor impact. However, the British Standard reads as follows:

“A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context.”

NLC is of the opinion that as background levels are already high in the area, allowing an additional +5dB will result in unacceptably high noise levels for the nearest resident, particularly during the night time hours.

Night-time noise levels in the area are already high with background at 49dB LA90 and ambient at 53 dB LAeq. To allow a 5dB increase in background will allow unacceptable noise levels at the nearest residential receptor and allow background levels to creep up in the area. The closest residential receptor is approximately 650m to the east of the proposed development, allowing +5dB would therefore allow the power station to raise background across a considerable area.

It is further noted that the World Health Organisation (WHO) recommend 45 dB LAeq outside bedroom windows to avoid sleep disturbance. Ambient noise levels are already higher than this in the area at 53 dB LAeq. Allowing background levels to increase by 5dB will raise ambient levels even further resulting in a detrimental effect on the resident.

NLC maintain the opinion that the operational noise limit should be set at 3dB above background and that the application documents demonstrate that this noise limit would be achievable. For the reasons outlined above it is considered that the amended Requirement 19 is not sufficient to protect the amenity of the nearest receptor. The requirement for the applicant to explore the possibility of achieving a lower noise level does not give any assurance that a lower level will be achieved and could potentially result in further disagreement at the discharge of requirement stage.