

Strategic Planning Economy, Transport and  
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Hampshire County Council  
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**Cllr. John Ward**  
Leader of the Council

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*(sent by email to [planning@hants.gov.uk](mailto:planning@hants.gov.uk).)*

Dear Sir/Madam

**Planning Application No. 33619/007**  
**Development of an Energy Recovery Facility and Associated Infrastructure**  
**Alton Materials Recovery Facility, A31, Alton GU34 4JD**

Waverley Borough Council (The Council) declared a Climate Emergency on 18<sup>th</sup> September 2019 that requires urgent action. This action includes the aim for the Council to become carbon neutral by 2030, taking into account both production and consumption emissions, and will take a leadership role to achieve this by working with other councils, including town and parish councils within the borough.

The Council objects in principle to the development of the above Energy Recovery Facility because it will increase air pollution and contribute to global warming. In addition, the operation on the A31 in-between the Farnham and Alton in East Hampshire, is in close proximity to Waverley and will result in a detrimental impact on the well-being of Waverley residents and its natural and environmental assets.

The Council's objections are:

1. Long term health conditions are known to be an issue near incinerators as most emissions are not recorded or reported and long term exposure. In terms of Waverley Borough, Farnham lies approximately 8 miles away from the proposed incinerator. Farnham itself has a population of nearly 40,000 at the last census. Furthermore, there are a number of smaller villages within Waverley that surround Farnham whose residents will be affected by the development too.
2. The CO<sub>2</sub> emissions caused by burning waste is directly contrary to the Council's aims for achieving carbon neutrality by 2030. The failure to meet this target will result in worsening global warming. The level of emissions from this facility will even make it difficult for the UK Government to meet its less challenging net neutral target by 2050. Burning waste to generate electricity is less efficient than burning coal.
3. There is already excess incinerator capacity in the UK and building more of this type of facility will result in the UK importing waste.



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4. The UK's waste problem will need to be addressed. Hampshire already falls short of Government recycling targets and incinerating more will not help it achieve those objectives.
5. The proposal will result in 20-40,000 additional vehicles on local roads. Development in both East Hampshire and Waverley, as well as in the Blackwater Valley and in Guildford means that vehicular movements through Farnham and surrounding villages has already resulted in high levels of congestion and unacceptable levels of air pollution. Waverley has two Air Quality Management Areas, one in Farnham and one in Godalming. They are both attributed to exceedances of the annual mean air quality objective for nitrogen dioxide due to traffic congestion. The operation of the facility will increase the movement of a range of different vehicles, including those of a size required to transport waste. This increase in vehicular movements will further exacerbate these detrimental impacts.
6. The environmental assets of the countryside surrounding Waverley's built up areas are very valuable and their importance is reflected by their national and local designations. The Surrey Hills Area of Outstanding Natural Beauty (AONB) makes up a large area of countryside that lies in between Farnham and Godalming/Haslemere. The AONB continues eastwards and northwards towards the boundaries with Mole Valley and Guildford respectively. There are a number of special protection areas designated for their important ecological habitats under European legislation. Therefore in addition to the impact on the South Downs National Park that lies close to application site, the development will have an adverse impact on Waverley's valuable environmental and natural assets, contrary to national policies to conserve and protect them.

The Council therefore objects to the development on the grounds that the development will be contrary to its declared aim to achieving carbon emission neutrality by 2030 but also that its operation will have a detrimental direct and indirect impact on the well-being of the Council's communities and natural assets.

Finally, the Council would like to place on record that a longer consultation period would have been preferable in view of the nature of the proposal, the desire of the Council to consult with all relevant parties and to allow for full consideration of the issues pertinent to the application. Notwithstanding this, and for the avoidance of doubt, please accept this response as the Council's formal **objection** to the proposal.

Yours faithfully



**John A Ward**  
Leader of the Council



**Steve Williams**  
Portfolio Holder for  
Environment & Sustainability