

**Planning application number 33619/007
for a Development of an Energy Recovery Facility and Associated Infrastructure**

1. Worldham Parish Council at their Parish Council meeting of 5th August approved unanimously to **OBJECT** to this planning application.
2. Worldham Parish Council object in principle for four reasons:
 - It would be detrimental to the surrounding landscape,
 - There will be an unacceptable increase in HGV movements with a significant detrimental impact on the rural network of roads
 - No alternative site has been explored
 - There will be a significant increase in emissions into the atmosphere.

LANDSCAPE

3. The site lies just outside the South Downs National Park whose boundary is located 1.2 km south east of the proposed development. The area surrounding the site is predominately rural. The proposed plant will dominate the landscape with 80m chimneys whose emissions including noxious gasses will be visible and be detrimental to the landscape and views from the National Park including from Worldham Parish.
4. The environmental statement assesses the impact of the proposed ARF on 21 viewpoints. The conclusion from the Veolia consultants are that the impact from 12 of viewpoints will be adverse.
5. There are 4 viewpoints in the statement relevant to Worldham Parish, Viewpoint 6: public footpath, Wyck; Viewpoint 10: Public footpath, north of Malms House, Viewpoint 11: Hangers Way, East Worldham, Viewpoint 18: Public footpath, off Clay Lane.
6. The assessment of all 4 viewpoints is that the impact on the landscape will be adverse. From some viewpoints the proposed stacks would be clearly visible with new skyline features and there would be occasional plume visibility. The presence of the development would result in obvious change to the make-up of the view and the effects would be significant.
7. The impact of the proposed ARF will have a material detrimental impact on the landscape and not just to the local rural footpath network, but also on the Hangers Way and St Swithun's Way.
8. The applicant's own consultants conclude that there will be a significant adverse effect on the local landscape.
"That the proposed development would have a **Significant Effect** locally: a moderate to major level of effect would occur due to the increased prominence of built development at the Site. The influence of development upon the landscape character would increase, due to the greater visibility of the Proposed Development when contrasted within existing buildings at the Site and associated localised changes to the skyline. Where there would be clear views of the Proposed Development, (within approximately 1-1.5km), effects would be significant".
9. The scoping report states:
"There are significant landscape concerns at this stage about the proposal to build an Energy Recovery Facility on this site. It is situated within an intimate landscape on the valley floor. The valley floor is a small-scale landscape with small fields, this is proposal on a completely different scale. The development has

the potential to swamp the valley with its scale and height, breaking skyline views.”

10. The proposed development is contrary to a number of local, regional and national policies including:

Worldham Parish Plan

11. The Worldham Parish Plan was adopted in 2016 and was updated in 2018. Residents were asked what was important to them with regard to the landscape and their environment. Out of 116 responses, over 100 felt that the rural countryside and views and the open landscape were important.

12. Policy 1 of the Parish Plan relates to the Conservation of the rural character of the Parish.

The Parish Council are to draw the attention of the planners where necessary to the conservation of the rural character of the parish.

South Downs National Park Policies

13. The National Park purposes are
- i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
 - ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.

14. Strategic Policy SD4: Landscape Character states:

Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:

- a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
- b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
- c) They will safeguard the experiential and amenity qualities of the landscape; and
- d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.

15. Strategic Policy SD6: Safeguarding Views – states inter alia

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.

National Planning Policy Framework

16. In respect of National Parks 2019, paragraph 172 of the NPPF states: “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight.... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major developments other than in exceptional circumstances, and where it can be

demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Hampshire Minerals and Waste Plan

17. Policy 4 of the HMWP. Protection of the designated landscape and in particular clause d “whether any detrimental effects on the environment, landscape and / or recreational opportunities can be satisfactorily mitigated. Minerals and waste development should reflect and where appropriate enhance the character of the surrounding landscape and natural beauty, wildlife and cultural heritage of the designated area”.
18. Policy 5 of the HMWP Protection of the countryside clause b:
b.” the nature of the development is related to countryside activities, meets local needs or requires a countryside or isolated location”.

The proposed development neither meets the local needs nor requires a countryside location when it will generate over 70,000 lorry movements a year.

East Hampshire Local Plan

19. Policy CP19 Development in the countryside
This policy sets out that the countryside is the area outside settlement policy boundaries and that the only development allowed in the countryside will be that with a genuine and proven need for a countryside location. As such the development would not comply with this policy.

TRANSPORT

20. The planning officers at HCC provided the applicant a detailed scoping opinion which stated:
21. *“EHDC advised that any application must assess impacts on infrastructure, soil resources, contamination impacts, development phasing and due to its size, visual impacts on the local landscape (including on the South Downs National (Park). Lastly, cumulative impact through traffic movements on the local road network, including on local rural roads, from all development (allocated/planned/under construction) within the Alton area.”*
22. The Transport Assessment provided by the applicant’s consultants does not satisfy this condition.
23. The council’s public consultation reveals residents would prefer to have smaller local facilities to reduce the number of lorries on the roads. This proposal would add considerable HGV traffic bringing waste in from all over the County and nearby Counties to feed the facility.
24. It is not possible to provide a detailed accurate response on the effect of the traffic through Worldham Parish as the Traffic Assessment report provided by the applicant does not provide any robust modelling or forecasting of the traffic impact on the local

roads such as the B3004 through Kingsley and East Worldham, a designated lorry route or along the A325 through Bordon and Whitehill.

25. The consultants forecast that there would be an additional 18 lorry movements a day through the village of Selborne and claim that, *this level of increase would be imperceptible to the casual observer*. (Paragraph 7.5.9). and in Paragraph 7.5.10 *This equates to on average, one additional trip every 15 minutes which be within daily traffic variations and would not be perceptible*.
26. This shows a complete lack of understanding and empathy to the residents of local rural communities, where any increase in HGV traffic is a major cause of concern on their quality of life.
27. It is contrary to the HWMP which states in Paragraph 6.198 *“All waste management has transport implications and transport impacts, and these should be minimised by prioritising sites with good connections to the strategic road network. The development of waste facilities in areas along the strategic road corridors may provide opportunities to maximise the transport of waste, **minimising potential impacts on local roads and the distance to the market**”*

ALTERNATIVE SITES

28. No alternative sites have been investigated. This is contrary to:

Hampshire Minerals and Waste Plan

29. Paragraph 5.36 *“Where the source of waste for a facility may arise from a range of **geographic locations, the impact of developing a network of smaller facilities, rather than one larger central facility, should be assessed** with respect to the likely transport impacts of both options on congestion, emissions, communities and sites of historic or ecological importance. It is also important that potential cross-boundary impacts and cumulative impacts of minerals and waste development with other local developments are considered”*.
30. Policy 25: Sustainable waste management clause c which states that “All waste development should: c. be located near to the sources of waste, or markets for its use”.

Schedule 4 of the EIA Regulations 2017

31. The Schedule identifies the information for inclusion in an ES, of which paragraph 2 requires: “A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

Emissions into the atmosphere

32. Worldham Parish Council has not the technical expertise to provide a detailed objection to the emissions that will be generated from the proposed facility. However, it has concerns regarding the emissions from the incinerator which includes discharges of gases, heavy metals emissions, organic compounds, fumes, odours together with CO₂, sulphur dioxide and nitrogen oxides.

Worldham Parish Council
c/o 25 Headley Road
Liphook
Hants
GU30 7NS