

**From:** HINDS, Damian  
**Sent:** 12 February 2021 10:15  
**To:** Strategic Planning <planning@hants.gov.uk>  
**Subject:** Objection: Application Reference 33619/007

Strategic Planning  
Economy, Transport and Environment Department  
Hampshire County Council  
The Castle  
Winchester  
SO23 8UD

12 February 2021

Dear Sir/Madam

**Application Reference 33619/007**

Objections to the above-referenced application were lodged during last summer's consultation period by residents in record numbers and by all the democratically elected representatives for the area in which the application site is situated (Parish Council, District Councillor, County Councillor and Member of Parliament) plus a significant number of neighbouring authorities.

I am grateful to the Council for requiring further and better information from the applicant on the various matters detailed in HCC's Regulation 25 letters and I note the material provided in response by Veolia. I wish, however, to reiterate my strong objections to this planning application and I urge Hampshire County Council to refuse it.

We must be ambitious to reduce consumption, to reuse and to recycle. I welcome the coming into force in October 2020 of The Waste (Circular Economy) (Amendment) Regulations 2020 and it is anticipated that the Environment Bill (with its important provisions relating to waste and resource efficiency) will be on the statute book by autumn of this year. The direction of travel is necessary and clear: whilst we should avoid landfill, settling for incineration is not good enough – it implies leakage from a circular economy. On 9 December 2020, the Committee on Climate Change<sup>1</sup> published its Sixth Carbon Budget report, in which it stated, "Achieving significant future emission reductions in the waste sector requires a step-change towards a circular economy, moving away from landfill **and** energy-from-waste ..." [emphasis added].

Energy recovery development should be used to divert waste from landfill only where other waste treatment options further up the waste hierarchy are truly unachievable. Given the recent growth in incineration capacity in the UK, I do hope to see very challenging analysis by the Council of whether there is a need anywhere in Hampshire for the kind of facility proposed by Veolia. Moving to a circular economy was one of the five investment priorities highlighted by the Committee on Climate Change in its June 2020 Progress Report to Parliament.

The Parliamentary Under Secretary of State for Environment, Food and Rural Affairs (Rebecca Pow MP) has reiterated in Parliament as recently as last month that, should wider policies not deliver the Government's waste ambitions in the long term, the introduction of a tax on incineration of waste will be considered. There has been significant growth in incineration capacity in the UK over the last decade and several proposed new facilities have already been consented in neighbouring counties; I believe at least one is already under construction. The creation of all this additional capacity may well act as a barrier to the creation of the circular economy and, if it does, it will create the further problem that any Energy from Waste (EfW) facility consented on the application site would have, over time, to source material from further and further afield, with obvious attendant adverse consequences.

It is hard to avoid the conclusion that, had this site not already been owned by the applicant, it would not have been proposed for an EfW facility. The proposed facility is wholly inappropriate, both in scale and in character, in relation to the Wey Valley location and its surrounding area. I note all the detailed information supplied about visual impact, landscape assessment, etc, but personally regard the inappropriateness of the site as being completely obvious in landscape and visual impact terms.

The application site is not only inappropriate in terms of the landscape and visual impact but also because it is not near to the intended sources of waste. Furthermore, although the site is on an 'A' road that road does not form part of the Strategic Road Network (managed by Highways England). Nor is the site served by a rail connection.

The carbon impact of the proposed facility is of serious concern both objectively and in the context of the Council's commitment to be carbon neutral by 2050. If consented, the anticipated lifespan of this facility will last beyond 2050, when the UK has committed to reach Net Zero. While local use of the heat produced would help to mitigate the facility's carbon impact to some extent, in reality the potential for local heat use can realistically only be described as extremely uncertain.

The Carbon Assessment delivered to the Council by the applicant in December 2020 stated:

"The recently published UK Government report 'Ten Point Plan for a Green Revolution' outlines the government's ambitions to capture 10 Mt of carbon dioxide a year by 2030. The government aims to incorporate CCS in up to four industrial clusters in areas such as the North East, the Humber, the North West, Scotland and Wales (due to their proximity to the North Sea), with CCS developed primarily alongside hydrogen plants.

Although the Ten Point Plan does not make specific reference to the incorporation of CCS with EfW (and does not identify the South of England as an area of specific interest), the 2020 Policy Connect report ('No Time to Waste'), states the following with regards EfW with CCS:

"Carbon Capture and Storage (CCS) technology is increasingly being trialled for different industries across the world. Recently a number of EfW plants across Europe have incorporated CCS both during the design and retrospectively".

Taking this into consideration, Veolia will continue to review the feasibility of retrospectively installing a CCS system as these technologies develop, subject to commercial and economic feasibility.”

Chapter 9 of the ‘Policies for the Sixth Carbon Budget and Net Zero’ (published by the Committee on Climate Change alongside its Sixth Carbon Budget report in December 2020) contains the following policy recommendations in relation to EfW [emphasis as per the original report]:

- “Examine the impact of waste reduction & recycling targets on the **utilisation of (and need for further) energy-from-waste plants**. Issue guidance notes to align local authority waste contracts and planning policy to these targets.
- New waste conversion plants (including incineration, gasification & pyrolysis facilities) **must be built with carbon capture and storage (CCS) or 'CCS ready'**.
- **Existing plants should start retrofitting CCS from late 2020s onwards, with 2050 a backstop date for full CCS coverage**. This will require either use of GHG thresholds for generated power & heat (could be set as part of the UK's new Bioenergy Strategy), access to CCS incentives to lower the costs of capture (particularly for smaller facilities further from CCS clusters), and/or carbon taxation (either taxes or inclusion in a UK ETS). Regional retrofit timings should be aligned with BEIS' CCS infrastructure plans.”

In conclusion, I very strongly urge the Council to reject this application.

Yours faithfully  
Damian Hinds