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Sent: 06 August 2020 10:33
To: Strategic Planning
Cc:
Subject: Objection: Application Reference 33619/007

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

6 August 2020

Dear Sir/Madam

Application Reference 33619/007

I object to this application on the grounds set out below. I believe that the adverse impacts of granting planning permission would significantly and demonstrably outweigh any benefits.

Waste Hierarchy

Policy 25 of the Hampshire Waste and Minerals Plan states, “All waste development should: a. encourage waste to be managed at the highest achievable level within the waste hierarchy ..”

On 9 May 2019, the Parliamentary Under Secretary of State for Environment, Food and Rural Affairs stated in Parliament, “It is important to do whatever we can to recycle as much waste as possible, but waste incineration plants continue to play an important role in generating energy instead of diverting waste to landfill. However, our assessment is that additional residual waste energy capacity above that already planned to 2020 should not be needed if we achieve our recycling targets.” (HC Deb 09 May 2019, Hansard Vol 659 cc643-4).

The legislative framework for waste sets out a waste hierarchy which gives top priority to preventing waste in the first place and, when waste is created, it gives priority to preparing it for reuse, then recycling, then recovery, and last of all disposal (e.g. landfill or incineration without energy recovery). The application by Veolia for this Energy Recovery Facility will see residual waste being dealt with at the ‘recovery’ level of the waste hierarchy. The clear

direction of travel from national government is to reduce the amount of waste which we, as a society, create and to drive the treatment of waste further up the waste hierarchy – to see it reused or recycled.

In December 2018, the Government published its Resources and Waste Strategy, one of a number of Strategies which are intended to deliver on the ambition of the Government's 25 Year Environment Plan: to leave the environment in a better condition than we inherited it by cleaning up the country and moving towards a more sustainable, circular economy.

The Environment Bill is now before Parliament and contains important provisions relating to waste and resource efficiency, namely:

1. it will allow the Government to deliver consistent and frequent recycling collections across England, ending the current inconsistencies between different areas;
2. it will also ensure the operation of weekly separate food waste collections, preventing food waste from going to landfill or being incinerated;
3. it will allow the Government to introduce clearer labelling on certain products so consumers can easily identify whether products are recyclable or not;
4. it will also allow the Government to expand the use of charges on single use plastics, following the successful introduction of the carrier bag charge, and will introduce a deposit return scheme on drinks containers, subject to consultation;
5. powers in the Bill to introduce new extended producer responsibility schemes will allow the Government to make producers responsible for the full net costs of managing their products when they are ready to be thrown away.

The Bill will enable the Government to change fundamentally the way we use resources, whilst reducing polluting plastic waste, increasing rates of recycling and making the products we use every day more durable and easier to recycle.

The County has three Energy Recovery Facilities already in operation which deal exclusively with waste generated within Hampshire. The Planning Statement for this application explains it is for a merchant site, meaning that it is not being brought forward to serve a specific / single public sector waste contract, but to serve the wider market; the input waste would be secured through a series of medium and long term contracts with a number of waste management companies. At paragraph 3.2.10 of the Planning Statement, it is stated that the facility would have a design life of around 30 years but that, in reality, many elements of the plant would last beyond this period. I believe there is a very real possibility that the operator of the

facility would need to bring in waste from further and further afield over the lifetime of the facility. If this were the case, the claimed environmental advantages of the facility would be much reduced.

Heat Plan

Section 3.2.1 of the Government's Resources and Waste Strategy states, "We want to help the companies that run EfW [Energy from Waste] plants to use the heat produced to improve their efficiency".

Paragraph 151 of the National Planning Policy Framework states, "To help increase the use and supply of renewable and low carbon energy and heat, plans should ... identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers."

It is not clear from the application documents that the proposed development will result in the heat produced being used at all.

Landscape and Visual impact

Appendix B (Locational Criteria) to the National Planning Policy for Waste states that considerations for the siting of waste infrastructure facilities include the need to protect landscapes.

Policy 29, 2e of the Hampshire Minerals and Waste Plan requires development to be of a scale compatible to the setting.

The scale of the proposed development is, in my view, entirely unsuitable to the landscape. I believe the visual impact will be enormous.

I also note that DEFRA's publication, 'Energy from Waste: A Guide to the Debate' states that the choice of site has a critical impact on the acceptability and viability of energy from waste, choice of technology and outputs

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf).

I also note the landscape assessment made by CPRE Hampshire (https://www.cprehampshire.org.uk/news/more-than-just-the-view-valuing-the-east-hampshire-landscape/?fbclid=IwAR1I2_Z2oNAKfcsxyJOJwmHj8xXOPpgy0XG3cUMXcD0ca0GDYGrdlqJM2_w).

Not Located Near to Source of Waste

Policy 25 of the Hampshire Minerals and Waste Plan states, “All waste development should ... be located near to the sources of waste ...”.

As per the section above on Waste Hierarchy, it seems very likely that, over time, more and more waste will need to be brought in from further and further afield, in contravention of Policy 25.

Transport Access

80 per cent of freight currently travels by road in the UK but the statutory commitment made to net-zero emissions by 2050 means that freight will need to be removed from the road in significant quantities. I note that the application site is not served by a rail connection.

Appendix B (Locational Criteria) to the National Planning Policy for Waste states that considerations when reviewing a waste planning application will include the suitability of the road network. The application site is not on a road which forms part of the Strategic Road Network (SRN) managed by Highways England. All routes giving access from the application site to the SRN (see following) would require HGVs to route directly through residential areas, which is a major concern:

- A339 Alton for access to M3 southbound;
- A31 Four Marks for access to M3 southbound;
- B3006 for access to A3, northbound and southbound;
- A325 Hale (Farnham) for access to M3 northbound;
- A287 Wrecclesham for access to A3 northbound.

Section 5.4.1 of the Traffic Assessment submitted by the applicant states, “It is anticipated that the waste that will be transported to the AAERF will comprise the following ... 84% bulk transport waste transported with average payloads of 19 tonnes.” Section 7.5.9 of the same document states, “In terms of HGV trips, the location which could experience the greatest impact is the B3006 through Selbourne [sic], which could experience around 18 additional HGV movements per day”. The Traffic Assessment does not seem to take account of the fact that there is a 7.5 tonne weight limit in place on the B3006 through Selborne, and the volume of traffic in general is a major blight on this historic village, which is a cultural asset for Hampshire and the South Downs National Park.

I note that Surrey County Council has made a submission to you in relation to this application indicating that it does not wish to see the routes through

Farnham and Wrecclesham being used by HGV traffic associated with this development, and requesting that a robust HGV routing plan be agreed and secured to monitor and control the impact of such movements. This would serve to increase the impact on Alton, Four Marks and Selborne and the other settlements located along the relevant section of the B3006 – as noted above, all routes directly through residential areas. I regard this as completely unacceptable.

I would also note that, since the application is for a merchant site without condition as to where it accepts waste from, and given the anticipated 30+ year life of the facility, the Traffic Assessment must, at best, be highly speculative.

I very strongly urge the Council to reject this application.

Yours faithfully

Damian Hinds