



Bentley Parish Council

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Planning Department
East Hampshire District Council

By email attachment

Dear Sirs

Veolia Incinerator and ERF: application 33619/007

Bentley Parish Council objects to the proposal to redevelop the Holybourne recycling site into an incineration and energy recovery facility for the following reasons:

Air Quality

1. Bentley is sited leeward of the south westerly prevailing winds with the parish boundary 2.5km to north east of proposed site. This will be a major concern to the health and wellbeing of local residents.
2. There are a number of conservation areas to the north east of the prevailing south westerly winds along the Wey Valley in the parish.
3. Air pollutant measurements from other, much smaller Veolia energy recovery sites show that these sites emit Oxides of Nitrogen, Sulphur Dioxide and Hydrogen Chloride. Modelling indicates that there will be similar emissions from this facility. Therefore, we are deeply concerned that communities downwind of this site will be affected by similar discharges.
4. We want full information about the potential for accidental leakage at this facility based on operational histories of similar sites
5. As a previous application for a similar facility on this site was rejected some years ago due to concerns about air quality for surrounding communities, we are surprised that a new application is being made given that these communities have all grown: The populations of both Bentley and Upper Froyle have expanded considerably.
6. The study report admits that there will be “conspicuous” “intermittent water vapour plumes” dependent on weather conditions from the proposed ERF stacks. Whilst we appreciate water vapour is in itself not harmful we are concerned about the visual impact to the area, especially given its proximity to the South Downs National Park (SDNP).

Visual Impact

1. This large industrial facility clashes with the rural nature of the area.
2. The proposal states that two 80m stacks will be constructed, which will be clearly visible from the SDNP, some 1.2km to south, and also from the higher ground in the parish of Bentley.
3. These stacks will obviously require warning lighting for aircraft and so will be visible to a wider area during night time.
4. The proposed building is itself 50m high. In the undulating landscape and proximity to the A31 and the railway this will also be impossible to disguise by any screening, spoiling views from the SDNP and of the local rural aspect outside the park. The site is too small for there to be any effective landscaping to disguise or hide the facility.
5. The study describes an “attractive external environment for the proposed built develop”. Given the limited space available for any suitable landscaping we wonder about Veolia’s definition of “attractive”.
6. The proposed development is out of scale with the surrounding countryside and not compatible with the setting.
7. Light and noise are acknowledged factors in the report but there is no definite plan to deal with this pollution. We need to see clear plans to deal with these effects on the local landscape and communities, especially as the facility is planned to be in continuous operation. The effect of light and noise, particularly during night time, is a major concern to us.
8. Grid connection for the power station we believe will involve over ground cabling and more pylons in the area. This is again likely to be visible from the SDNP and will spoil views. We want to see details and plans to minimise the impact of these installations.

Traffic and Transport

1. The study recognises there will be additional lorry traffic to and from the site with an increase from 128 movements to 216 movements per day. This is a 41% increase and will have a significant effect on traffic flow through Bentley since traffic from the west to the facility has to turn at the A31 western slip roads to Bentley. This will add further congestion to the village from these large lorries. This will be worse during construction with the daily movements of staff vehicles predicted to be 466 and daily HGV movements 100.
2. Increased traffic around the village has become a sensitive issue through recent, continuing and proposed residential developments in and around the area. Bentley has become a focal point for road access to the M3 and A3 from the county and these additional movements will add to this serious problem.
3. A more efficient site entrance for lorry traffic approaching from the west is required should the proposal proceed. We would object to a continued turning arrangement in Bentley.
4. As stated above, there is potential for visible gas plumes from the proposed facility which could impair visibility to both road vehicles and rail services that both run very close to the site. We are concerned about safety from these emissions for road and rail users.
5. We are also concerned that no traffic and transport assessment has been considered at this stage. This we believe is an important consideration in any such development, especially at a time when traffic along the A31 between Alton and Farnham is increasing due to residential development in the area.

Environment

1. The application appears to be dismissive of the effect of noise and disturbance on the local communities and environment. Veolia appear to have no interest in the effect of this proposed facility on the local area. We do not find this an acceptable attitude.
2. The River Wey is an important wildlife corridor in the area and potentially under further pressure from this development.

3. We are concerned that this development will increase pressure on wildlife in and around the Wey Valley conservation areas, in particular about effects on the SSSI at Bentley Station and, indeed, Alice Holt forest and the SDNP, which are to the leeward side of the proposed facility.
4. Water contamination is a serious risk to ground water and the nearby river. The river is just 130 metres from the proposed site and flows towards Bentley. It is a significant fishing river, which eventually runs into the River Thames and has only just been cleaned up in recent years. These hazards have not been considered in the scoping report.
5. The development will require excavations into a principle aquifer with the risk of ground water contamination.
6. The proximity of the site to the river is extremely worrying and we are concerned that there has been no flood risk assessment in the scoping study.
7. The change of use for this site, effectively replacing “clean” recycling waste with “dirty” waste will lead to waste odours both to local communities, road and rail users. This is a concern.
8. We perceive the potential for an increase in rodent activity in local communities and farms. This possibility needs further and more detailed consideration.

Operations

1. We request that it is a requirement that gas monitoring from the stacks will be continuously maintained and data kept publically available for inspection.
2. We also wish to see procedures for the disposal of residual products after incineration.
3. The district heating network is being sold as a headline benefit of the ERF project but, in fact, without subsidy, for which the project will not qualify, the heating plan is not economically feasible. Therefore, generated heat is to be wasted. This contradicts the policy to use all energy generated from the plant.
4. The ERF project gives no details of water supply to the plant for power generation. These plans need to be published. Will this involve water extraction from the River Wey or from local aquifers? Both are under severe stress.

In summary, we note that the proposed development is almost twice the size, in terms of generating capacity, of any other Veolia run site in Hampshire. We are disturbed at the choice of this site in the most populated area of rural north Hampshire and would like to know why existing sites cannot be expanded to accommodate the additional capacity sought in this proposed development. We find the proposal completely unacceptable.

Regards

Cllr John Goodyear, Chairman, Bentley Parish Council
Cllr John Fuller, Planning Officer, Bentley Parish Council