

To: Sam Dumbrell (case officer)
Strategic Planning
Hampshire County Council

Case Officer: Nick Upton
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Date: 21 August 2020
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By Email

Dear Mr Dumbrell

Proposal: Development of an Energy Recovery Facility and Associated Infrastructure

Site: Alton Materials Recovery Facility, Farnham Road, Froyle, Alton, GU34 4JB

Thank you for the opportunity to comment on this proposal. East Hampshire District Council has considered the planning application and raises a **strong objection** to the proposed development for the reasons set out below:

Impact on the character and appearance of the area

The existing MRF building is a sizeable structure in the countryside which, with a maximum height of 15 metres to the top of its curved roof does have a visual presence locally. However, despite its size its impact is actually limited to more of a localised one with existing trees and landscaping when in full leaf helping to absorb the mass of the building.

The application site does sit within a shallow valley, albeit the valley sides to the east and west are relatively gentle. Despite this, views of the site from the east and west and certainly along the north/south A31 are readily apparent.

The proposed redevelopment of the site would see a main building sit under a curved roof with a maximum height of just under 40m. There would be two 80m high emissions stacks and connected to the main building would be an air-cooled condenser.

The NPPF (para 170) states that planning policies and decisions should contribute to and enhance the natural and local environment and should recognise the intrinsic character and beauty of the countryside.

Paragraph 127 requires that planning decisions should ensure that developments will function well and add to the overall quality of the area.....are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.....are sympathetic to local character and history, including the surrounding built environment and landscape setting.

The impact of the main building at three times the height of the existing structure would be substantial. The two 80m tall emissions stacks would draw the eye from some distance away and advertise the sheer scale of the proposed development they would serve.

The development would undoubtedly have a significant change on the appearance and character of the site and local area. The extent of development proposed across the site and its

excessive height would have an extensive physical presence on the land and introduce an abrupt form of development into this area of countryside.

Overall, there would be a significant adverse effect on the character and appearance of the site which would fail to conserve the rural character and appearance of the local area. Despite the existing MRF development on the site, the presence of a 40 metre tall building within this rural area would be entirely out of keeping with the low key rural land use. As such, the proposal would constitute an incongruous addition which would adversely affect the character and appearance of this rural area.

In terms of the harm to the wider landscape, the site is a relatively visually exposed landscape whereby it can be seen from some distance away. The applicant has stated that only 7 of the 21 identified viewpoints would have a significant adverse effect. Whilst this is telling, it is also disguising the fact that an additional 6 viewpoints would have a moderate adverse effect. The remaining viewpoints are neutral but none are beneficial. The conclusion to be drawn from their own assessment is that harm will be experienced from further afield with the development appearing incongruous and overbearing in this landscape and its presence being permanent and irreversible.

The site lies approximately 1.2km away from the boundary with the South Downs National Park (SDNP) to the east. The substantial scale and bulk of the development together with the gently undulating landscape in this direction would mean that the development would be very noticeable from the SDNP. As the setting of the SDNP would be affected the purposes of the National Park need to be considered:

- *To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*
- *To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public*

The development would impact on the context and natural beauty of the SDNP and hence is likely to have a knock-on impact on the public's understanding and enjoyment of the special qualities of the National Park.

Finally, the scale and height of development proposed would conflict with the objectives and strategy set out within East Hampshire's adopted Landscape Character Assessment (LCA). This places the site in the Northern Wey Valley Landscape Character Area where a variety of land uses exist where the flat landform and hedged fields create a medium scale landscape. The LCA states that the landscape strategy for this landscape character is to conserve the tranquil natural character of the Northern Wey Valley. For the reasons identified above, the proposed development would not readily accord with this strategy.

Impact on Heritage Assets

The submission demonstrates that there will be adverse impacts on the significance of 17 heritage assets located within a 2km distance of the facility. Of the 17 heritage assets 15 are considered to be within the lower/negligible end of less than substantial harm in NPPF terminology. The Council agrees with this conclusion as the proposed development would largely only be visible in glimpsed views, at a distance and in combination with housing and the A31.

The Upper Froyle Conservation Area is in an elevated position and there is no doubt that part of its significance lies in its relationship with the surrounding countryside.

Views within the village and of the immediately adjacent farmland make a positive contribution to the conservation area's character and appearance. In terms of wider setting, the village has some available views across the surrounding countryside, which make a positive contribution to the historic and architectural heritage values of the conservation area. Views of the surrounding countryside are available to the north and south of the village, however, there are some longer distance views at the western end of the village that would include the proposed development. As the proposal is to introduce a large scale industrial development into these views this would have an adverse effect on the conservation area. Whilst the views would be over 1km away the prominence and size of the buildings would stand out as an alien feature. Nonetheless the village would retain a predominantly rural outlook. Having regard to the above the harm to the Upper Froyle Conservation Area is less than substantial within the moderate/lower bracket.

Bonham's Farm House is Grade II* listed and at 500m from the proposed development is one of the closest heritage assets. Being Grade II* the asset is highly significant and the Council recommends that Historic England is consulted as part of any determination made by HCC. The building has architectural, historic and archaeological interest. The architectural and archaeological interest (evidential and aesthetic value) rests in the design and fabric of the building. The immediately surrounding gardens and grounds, and the two surviving associated historic barns form the setting of the listed building, this setting is then largely surrounded by mature trees. This setting makes a positive contribution to the asset's historic heritage value as a high-status farmhouse or house set in large grounds with associated buildings. As a farmhouse, the relationship between Bonham's Farm House and the immediately surrounding farmland also contributes to understanding and appreciating the historic use and development of the site, this wider setting therefore also makes a positive contribution to understanding and appreciating the heritage interest and value of the listed building.

Mature trees surrounding the site do offer some screening and the noise from the A31 does form part of its setting. However, due to the size of the structure this will add a large scale industrial development into views from the setting of the listed building and this would have an adverse effect on the assets. The applicant's conclusion that the harm would be less than substantial with a moderate (adverse) impact is agreed.

It is noted that there is no assessment given in the ES relating to Fulling Mill which is located within 500m of the proposed development. Whilst this is a Grade II listed building due to its location the building warrants assessment with regard to heritage impacts. It is suggested therefore that the ES is amended to assess this heritage asset.

In consideration of the above and subject to further assessment the Council believes the overall level of harm caused by the development will be less than substantial. As such the County Planning Authority needs to consider whether the public benefits outweigh the harm that would be caused.

Accordance with East Hampshire's Climate Strategy 2020-2025

East Hampshire District Council has pledged to reduce its carbon emissions as part of a new strategy to tackle the climate emergency and last year adopted a Climate and Environment Strategy 2020-2025. The Council declared a climate emergency in July 2019.

The two main objectives of the Climate Strategy are to reduce carbon emissions to net-zero by 2050, in line with the government commitment, and to protect and enhance the local natural environment. The proposed development runs contrary to these goals.

Whilst the proposed development might remove more waste from ending up at landfill sites, there is concern over the amount of waste that could be recycled being instead used at

incineration plants such as this. Burning potentially recyclable materials in order to generate electricity discourages efforts to preserve resources and creates incentives to generate more waste and less recycling.

In addition, the burning of waste contributes towards the unwanted effects of climate change because rather than being climate neutral, incineration actually emits substantial amounts of carbon dioxide. Therefore, the amount of hazardous emissions need to be controlled to avoid vast amounts of pollutants that could contaminate air, soil and water (chalk stream nearby), and end up entering the food chain.

Whilst the applicant has suggested that 50% of the waste used could be said to be a form of renewable energy, the evidence for this is less clear. Unlike wind, solar or wave energy, waste doesn't come from infinite natural processes, instead it is sourced from finite resources like minerals, fossil fuels and forests, that are cut down ordinarily at an unsustainable rate.

So, while on the surface it would seem that providing energy through waste and reducing landfill might be a good thing for the environment, the reality is that this development would not accord with this Council's pledge to reduce carbon emissions to net-zero by 2050 and to protect and enhance the local natural environment.

The proposal doesn't address the main issue that, nationally, too much waste is simply being produced that cannot be recycled, or safely disposed of. This proposal simply 'kicks the can down the road' as the issue of waste disposal continues to escalate.

Sustainable Transport

The applicant has stated that the development would comprise a power station for the recovery of energy generated from residual waste and that the waste would primarily be from commercial and industrial sources within Hampshire and surrounding authority areas.

It is noted that the majority of the residual waste managed at the facility would be brought in Monday to Friday. The predicted traffic generation levels are likely to be in the region of 216 HGV movements per day (108 in and 108 out).

It is unclear the extent to which this site would cater for waste being delivered from sources outside the district and county. Rather than a public facility, the development would be a commercial enterprise (a merchant facility) potentially allowing waste to be received from far and wide. Material imported from outside the area is contrary to reducing carbon. Therefore, whether this could be seen as a sustainable form of development in terms of promoting sustainable transport is extremely unlikely.

The number of additional traffic movements is seen as unacceptable from day one of the operation. As time progresses and Hampshire and other counties improve the level of recycling the waste fuel for this plant will have to be brought in. This is against EHDC and HCC's Climate Emergency.

HGV route

There is widespread concern over the suggested lorry route through Selborne (B3006) which has a lot of listed buildings along the street, narrow footways and a school entrance on the north end of the village set in the bottom of a dip, 20mph limit, and a 7.5t weight limit.

The fact that the application site is located such that it can only be accessed via the southbound carriageway of the A31 highlights the inappropriateness of the site for a strategic waste facility. Given Hampshire County Council's declaration of a Climate Emergency, it would seem perverse

to knowingly permit a facility which will require a significant proportion of HGVs to travel an additional 6.8km for the next 30 years simply to access the site. Even assuming only half of the 108 HGVs accessing the site come from the south (in reality this is likely to be significantly more), those vehicles would need to travel an extra 95,420 km a year simply to deal with the specific configuration of the local road network.

There are two crossing points close to the Hen and Chicken Inn, making it possible for vehicles travelling north on the A31 to make a u-turn to join the southbound carriageway. However due to the safety concerns of slow-moving vehicles turning onto the A31 there is a s106 agreement attached to the current development preventing HGVs access the site from making u-turns at these points on the A31. Anecdotal evidence from local residents suggests that despite this restriction, HGVs do use this crossing point to access the existing Veolia site. This dangerous situation would be exacerbated by the current proposals for the ERF.

Need

Hampshire already has three incinerators and this application would make it four. Question whether the county needs more incinerators. The application references taking waste from Hampshire and generating electricity for Hampshire. In practice the ERF would take waste from many counties including Surrey, Berkshire, Kent etc. Also, the electricity generated would be fed into the national grid and be consumed anywhere in the UK. So this is not Hampshire waste generating electricity for Hampshire residents.

Policy 27 of the adopted Hampshire Minerals and Waste Plan (HMWP) requires an additional 390,000 tonnes per annum (tpa) of non-hazardous recovery capacity to be provided by 2030. The 2018 Review of the Hampshire Minerals and Waste Plan looked at the target capacity to be delivered against the actual capacity. It states that by 2015, a total of 355,000 tpa of recovery capacity had been delivered which means that only another 35,000 tpa is required in the period to 2030 i.e. only 10% of what is actually being proposed. So, this facility is not needed to meet demand in Hampshire.

Whilst the application will have to be considered on its own merits, it is of note that the application has not considered alternative sites which could cause less environmental, visual and safety impacts but have chosen this one as it is already owned by the applicant.

Heat generation would be wasted

The National Planning Policy for Waste states that "Where a low carbon energy recovery facility is considered as an appropriate type of development, waste planning authorities should consider the suitable siting of such facilities to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers". The waste authority should consider this in relation to the proposed application as no local heat customers currently exist nor are likely to exist in the future because the facility is in the countryside

Connection to the national grid

The connection to the National grid is an essential part of the project. Without that connection or any other way to store the electricity generated, the proposal is simply an incinerator. The lack of any detail on the grid connection is a major omission as this on its own may give rise to significant environmental effects. No explanation is provided as to why consent is not being sought for the connection as part of the application for the ERF, contrary to NPS-EN1. Furthermore, it is unclear how the applicant will acquire the rights to lay an electricity connection given that it does not have control of the land.

Emissions

Concerns are raised over the impact of emissions on human health. Nearby settlements have a combined population in excess of 130,000 people, who will be subjected to additional nitrogen and sulphur oxides contained within the exhaust plume of the facility. Of particular concern is the possibility of emitting dioxins, which can result from the incineration of plastics, and which are toxic even in small concentrations.

The development is not 'climate positive' as claimed by some of the developer's PR material. In order to be truly climate positive the development would need to result in negative greenhouse gas emissions. The developers own analysis demonstrates that this is not the case.

The development claims to be 'better than landfill' in terms of greenhouse gas emissions. Although the developer has provided evidence for this, the evidence looks only at the proposed year of opening in 2023. If a longer-term whole lifetime comparison of the development's greenhouse emissions over its proposed 25-year life is undertaken, then then it is doubtful as to whether the development will indeed be better than landfill. This aligns with the Government's comparative greenhouse gas modelling of disposal of residual waste incineration against landfill.

Disposal of toxic residue

There is deep concern regarding the highly toxic lime powder residue from the incinerated waste. This is so contaminated with heavy metals and toxic that it has to be transported to a company which supplies underground deep storage facilities, i.e. salt caverns in Cheshire approximately 170 metres deep. This is described as hazardous waste which cannot be disposed of by any other method.

To indefinitely store two million tonnes of toxic waste at this facility over the next twenty years is storing up problems for future generations. Residents living in the vicinity were also concerned about spillages, noise, dust and lorry movements.

Employment

The overall loss of jobs. Once construction is over there will be a reduction in local employment. There is no evidence that the construction itself will provide temporary benefit to the local economy as specialised management, engineering and labour will have to be brought in from further afield.

No information has been provided concerning the electricity connection into Alton and whether this would disrupt the town's main employment site at Mill Lane.

Aquifer

The digging of a waste bunker so close to the Aquifer needs to be thoroughly assessed in terms of groundwater pollution.

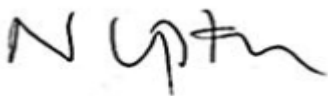
Other comments raised by third party representation

Third party representation has generally been sent directly to Hampshire CC, but 91 objections have been received by the district council. Whilst most of these comments relate to matters raised above, there are a few additional comments that can be summarised as follows:

- Why should Holybourne take trade waste from other Counties with the resulting HGV movements
- The size of this facility is excessive and driven by commercial ambition, not need. It far exceeds the waste disposal requirements within Hampshire and especially within East Hampshire. Even the electricity output would be more than the number of houses within East Hampshire. Object on the grounds of overdevelopment.
- The tall chimneys impact on airspace in particular Farnborough Airport and RAF Odiham
- Risk due to proximity of the oil terminal
- Surrey County Council refuses all applications for incinerators
- Noise pollution
- A31 is in a very poor condition and needs urgent repair work
- Impact on wildlife
- Road safety concerns from HGVs
- Smells and fumes
- Urbanisation of the countryside
- Impact on visitors to Jane Austin village (Chawton)
- Potential of waste escaping into the River Wey nearby
- Goes against government policy
- Hampshire would be the waste and refuse treatment centre for all of the south of England
- There is no provision in the HWMP for any AAERF facility operating as a 'merchant plant' to be located in Hampshire, nor is there any provision for waste 'merchant plants' to import and treat waste from the wider market outside the county
- Approval of this application would create a precedent
- In view of the close working relationship that exists between the applicant (Veolia) and Hampshire County Council (Project Integra), a perception of 'conflict of interest' is a real possibility

For the reasons set out above, East Hampshire District Council raises a **strong objection** to the proposed development.

Yours sincerely



Nick Upton
Development Management Team Leader