



c/o Old Chapel Cottage, Lower Froyle, Alton, Hampshire GU34 4LS

Our ref. FPC/20/016

Date: 15 February 2021

Dear Sir,

**Second Objection to Planning Application 33619/007 : Development of an Energy Recovery Facility and Associated Infrastructure at Alton Materials Recovery Facility, A31, Alton GU34 4JD – Regulation 25 Consultation.**

Thank you for giving us the opportunity to review the documentation submitted by the Applicant in response to HCC's Regulation 25 requests. Froyle Parish Council (FPC) has considered this additional information and considers that while it may provide some clarification to issues previously raised, it does not materially change our **OBJECTION** to the scheme. FPC's comments as set out in our letter of 14 August 2020, represent our formal response and we still have serious questions and fundamental concerns as set out below.

**SUITABILITY OF SITE AND VISUAL IMPACT**

We maintain that this site is not appropriate for an industrial building of the dimensions of the **Energy Recovery Facility (ERF)** and that locating it there will have a seriously detrimental impact on the far reaching views across the North Wey Valley into the South Downs National Park. The Hampshire Minerals Waste Plan 2013 (HMWP) policy states that development "*should not cause unacceptable adverse visual impact*" and that it "*should maintain and enhance the distinctive character of the landscape*". The Applicant's response to the Regulation 25 requests does nothing to suggest otherwise. FPC notes the following from the Applicant's Regulation 25 responses:

**Visual Impact**

- The Applicant was asked to assess the visual impact from various additional viewpoints around the site. Having now studied a total 57 viewpoints, they have been forced to admit that there were "*some additional specific locations which would experience significant effects not described in the original assessment*". They acknowledge that out of the viewpoints now studied, 30 would experience significant adverse visual effects, whereas only seven had previously been identified. This confirms that the Applicant had previously understated the visual impact and reinforces FPC's assertion that this location is totally inappropriate for a building of the size and scale of this ERF.
- FPC would stress that these additional viewpoints are all located within a 2km radius centred on the site. The Bare Earth ZTV and DSM ZTV identify many other locations, outside the 2km radius, from where the building and/or stacks would be visible. From our local knowledge, some of these locations have wide ranging panoramas on which the ERF would have a significant adverse impact on the view and landscape setting.
- Similarly, the Applicant has limited the search area for impact on residential properties to a 1km radius centred on the site, "*based on their professional judgement and experience from windfarm appeals*". FPC does not understand the 'windfarms' reference

or consider it to have any relevance to this application. FPC maintains that the search area should be drawn with reference to context not an arbitrarily selected distance from the site. Had the Applicant used the same 2km criteria as for visual impact, the residential impact would increase significantly as it would then encompass not only the closest settlements including Upper Froyle but also a part of the town of Alton and in particular the settlement of Holybourne where there are considerably more residential properties that would be affected.

- In Upper Froyle there are many dwellings, some listed, that will undoubtedly suffer an adverse impact. The report dismisses this, stating that there *“would be some impacts on the western edge”* and that the rest of the *“settlement would be largely unaffected”*. This ignores the fact that most of the residences in Upper Froyle are sited on this ‘western edge’, which is on higher ground, and would therefore impact at least 50% of properties in the village.
- Moreover for our community, the visual impact will be considerably more than this analysis suggests. It will be visible from any number of publicly accessible roads, spaces and community buildings. It is something that will affect our day-to-day lives and adversely affect the rural setting of our Parish.
- Despite this considerable increase in visibility, the Applicant concludes *“the additional information provided establishes that the development would be visible from a very few publicly accessible viewpoints with visibility restricted in most locations by intervening topography and vegetation”*. FPC contends that the above points demonstrate to the contrary as the impact has only been considered in a very small radius from the ERF site. An industrial building of this size with its two 80m chimneys will inevitably be visible for miles around and blight the landscape.

### **Landscape Assessment**

The Regulation 25 notice included a requirement to *“update and inform its assessment...in respect of landscape and visual effects”*. We do not believe the Applicant has sufficiently assessed the landscape impacts of the development and followed the Industry Standard Recommendations (‘Guidelines to Landscape and Visual Assessment’, 3<sup>rd</sup> edition).

- Their assessment of landscape effects continues to be discursive and over-reliant on published Landscape Character Assessments without any independent, objective study of the landscape at a local level, based on fieldwork.
- The Applicant’s assessment of the Wey Valley’s susceptibility to change fails to take into account the documented ‘threat’ to *“open interrupted skylines”* posed by *“tall vertical structures, which break the flow of the landscape and undermine the scale of the valley”*.
- Their judgements of potential magnitude of effect repeatedly reference the degree to which the proposed development would be visible (fundamentally contradicting the dual approach to LVIA, whereby effects on visual amenity are assessed separately to those on landscape) and fails to take into account potential changes to the perceived or experiential landscape.
- FPC remains extremely concerned that the proposals will drastically impact the landscape of the northern Wey Valley. The analysis of this critical issue by the Applicant remains inadequate and not conducted in accordance with standard industry guidelines.

## Impact on Setting of the National Park

Despite requests in the Regulation 25 notices, there is still insufficient consideration of the setting of the ERF on the neighbouring South Downs National Park.

- The Applicant claims that the significant adverse impact the proposed development has on the views from north of the site, south towards the SDNP “*would not be significant in terms of the overall setting of the designated area*”. They appear to be suggesting that, as this is a relatively small part of the whole National Park, it is not significant. Clearly, if this principle were to be extended to the whole Park, there would be no protection anywhere.
- Of the 30 viewpoints identified as having significant adverse impact (see above), seven are within or on the boundary of the SDNP and a further seven are from viewpoints looking southwards into the National Park. Therefore, around 50% of the views identified have a direct bearing on the National Park. FPC would suggest this would be significantly more if the search area was extended beyond the 2km radius.
- This is particularly evident in the northern views from Froyle Parish. For instance Froyle PRoW 20 from Saintbury Hill Farm is a well-used local footpath for residents, just outside the 2km radius and has extensive views southwards to the SDNP over the current MRF. This expansive view over the SDNP would be seriously affected by the proposals and it is notable that the Applicant has chosen to exclude it.

## Lack of Screening

The Planning Permission for the existing MRF included conditions with regards to landscape screening which was welcomed by FPC at the time. In our objection to the ERF dated 14 August 2020, we note that there was very little room for any additional planting. Far from adding to the existing screening, it would seem that the minimal screening that is currently on site will further be depleted to accommodate the building (App B Updated AIA Arboricultural Implications Plan). This would make it more visible and open up views to the east along the A31 towards Upper Froyle and to the west facing Hawbridge Farm.

## Green Wall

The Regulation 25 notice requested further details on the ‘green walls’. The Applicant has provided a report on a green wall at the Leeds ERF as an example of a comparable green wall installation. FPC believe that this precedent is not an appropriate response to this request as it is in an urban setting and does not sufficiently reflect the detail or design intent of the project at Alton ERF. FPC would note the following:

- a) The green wall at Leeds ERF is merely a design feature for a building on an industrial estate, in an urban setting. It does not attempt to ‘blend the building into its background’ in the way it needs to at the Alton site;
  - b) The Leeds ERF has a green wall on its south facing façade only. The Alton ERF will have green walls on all façades, including the north. FPC believes plants on this façade will struggle to survive or the planting would need to be non-native varieties.
- The Applicant states that the walls will be planted with “*species of local provenance*” to “*provide seasonal colour to reflect the changing colours of the landscape*”. The Applicant, in its Regulation 25 response, has not given details of the planting and as a result demonstrate in any way how this will ‘assimilate the building into its surroundings’.

- The technical information provided indicates a maintenance regime serviced from cherry-pickers. There is dedicated space to access the single plane wall at Leeds, unlike Alton where it is not clear how the many levels and setbacks are to be accessed, nor how the cherry-picker will avoid blocking the main lorry access roads without interrupting the ERF operation. Clearly commercial imperatives to maintain operations will take precedent over maintenance of the green wall.

## Plume

The Applicant notes that any plume “will draw attention to the presence of the development” and potentially rise 100m over the chimneys, substantially increasing its overall visual impact. However, they go on to state that the plume will only be visible for 8.9-13.5% of the time. Their conclusions are based on “technical modelling” - although no modelling data is provided - and “anecdotal” weather observations made on two visits.

- The Applicant maintains that from its two site visits that mist and fog are a “characteristic of the Wey Valley”. They also maintain that plumes will be more visible during meteorological inversions which they state are ‘occasional’ or ‘transient’. They do not present any weather data to substantiate these statements and, as residents, FPC know that this is not the case.
- Contrary to the Applicant’s calculations and conclusions, FPC have seen weather data from RAF Odiham indicating that, far from being cloudy much of the year, there is cover of 2 Oktas or less 58% of the time and horizontal visibility of 5 miles or more 86% of the time. FPC also understand that relative humidity (RH) is more important in determining plume visibility and, based on the above data, this is at a level that would make plumes indistinguishable from cloud no more than 13% of the time. This would seem to indicate a far higher visibility of the plume than the Applicant’s analysis indicates.
- FPC would request HCC impose plume abatement technology to remove the plume and reduce the perceived industrialisation of the rural landscape
- FPC consider that, in the light of the above data, the Applicant’s modelling is flawed and that HCC planning should request further information on the plume modelling based on actual weather statistics for the area in order that independent verification can be sought.

## Conclusion

**It is evident from the Regulation 25 response that the ERF development will be far more visible than the Applicant originally stated. In its response, the Applicant has still given insufficient regard to the landscape setting of the ERF and especially its impact on the SDNP. Despite the Applicant’s assertions that it will blend into its landscape, FPC remains convinced that the ERF will stand out as an alien intrusion in this rural setting and blight the Wey valley for years to come.**

## NEED AND SUSTAINABILITY

### Alignment with Hampshire Waste Strategy

The Regulation 25 notice requests further information to demonstrate that the proposed facility will not result in an “overprovision of recovery capacity in Hampshire and potential for

*impact on the provision of recycling*". It is important therefore that the Applicant demonstrates the 'need' matches the proposed capacity.

### **Need for EFR Capacity vs Recycling in Hampshire**

The Applicant continues to assert that there is an under provision of recovery capacity in Hampshire based on seriously outdated data. The data been used by the applicant was updated in 2018 to show that 354,950 tonnes of additional capacity had already been delivered with the capacity shortfall of c.34,000 i.e. less than 10% of the capacity of the ERF proposed by the Applicant. This updated information has been ignored by the Applicant. The capacity data has been further updated and recently published in the 2020 HMWP review proving that Hampshire does not need this additional incineration capacity.

- HMWP 2013 Policy 27 outlines a requirement of 388,000 tpa of recovery capacity between 2011 and 2030. This requirement has recently been reviewed in the 2020 HMWP Review published on 14 January 2021. This now reports that the actual capacity achieved between 2011 and 2020 is 645,690 tpa, which is 84% above the target and 10 years early than anticipated.
- As a result of this additional over capacity, the Applicant is already having to burn waste sourced from outside the county. The UK Government's 'Waste Data Interrogator, Incinerator Waste returns 2018' shows Hampshire incinerators already treating waste from Dorset, Somerset, Southwark, Berkshire, Surrey, Bristol, South Ayrshire, West Sussex, Hammersmith and Fulham and even 'outside the UK'.
- If this ERF were to be permitted, it would increase recovery capacity in Hampshire by a further 330,000 tpa to 975,690 tpa, which is over two and a half times that required by the HMWP 2013. It is evident therefore, that this facility is far in excess of the need within Hampshire and is contrary to the statutory development plan.

### **There is therefore an overprovision of recovery (incineration) capacity in Hampshire.**

- As noted in our original objection, Hampshire is amongst the lowest performing counties in the country in terms of recycling rates. The 2020 Review of the HMWP notes that there was a predicted shortfall of recycling capacity between 2011 and 2030 of 75,528 tpa against a target of 223,386 tpa.
- The excess ERF capacity risks drawing waste from recycling streams thus exacerbating the shortfall and acting as a disincentive to the sustainable management of waste stream.
- The Applicant puts forward a financial argument based on the cost of recovery vs recycling as a means for controlling this shortfall. However, with increased capacity it is reasonable to assume that the gate fees will be lowered in order to continue to provide feedstock for the ERF plant. Lowering the gate fees will reduce the gate fee differential that is claimed by the Applicant to ensure that recyclables are not incinerated, further damaging recycling rates.
- This would be contrary to HCC HMWP and against the direction of Government Policy towards a circular economy, as highlighted by the Committee on Climate Change's Sixth carbon Budget published on 9th December 2020 which states "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 ...".

**There is an under provision of recycling capacity in Hampshire and attention should be focused on developing additional capacity which enhances Hampshire’s recycling activity in support of the circular economy not installing additional and excess incinerator capacity.**

### **Heat Offtake**

As outlined in our previous objection, and ERF must utilise waste heat to place incineration above landfill in the waste hierarchy. This is a key element in the sustainability of ERF facilities and should be a determining factor in where these facilities are located, as cited in both the HMWP and Climate Change Act 2008.

- Despite specific requests in the Regulation 25 notice to investigate sources for waste heat, the Applicant does not adequately respond to this issue merely stating that it will be addressed once the plant is built. FPC believe that the potential for waste heat use is a fundamental criteria in the sustainability of the plant and thus the choice of location.
- By the Applicant’s own admission, it is not viable to provide waste heat to existing users as the *“costs and disruption of retrofitting can limit supply of heat to existing operational business”*. They further add that, even if they could, there are *“significant challenges to be met in the provision of heat for industrial purposes and residential space heating”*. They maintain that opportunities may occur in the development of *“large potential strategic housing sites”*, however in the recently adopted EHDC Local Plan 2017-2036, there are no housing sites within 2km of the ERF that are not already being built out.
- The only ‘large potential strategic housing site’ in the 2017-2036 Draft Local Plan of a size that would make a good candidate for waste heat use, was Northbrook Park, a ‘New Settlement’ of 800 houses. However, at over 7km it is too far away to be viable, and in any case this development was eventually omitted from the Local Plan as adopted.
- It is notable however, that the other ‘large site’ identified in the EHDC Local Plan is Bordon Whitehill which would be an excellent candidate for an ERF producing heat and power. Here, the heat network could be integrated as part of the ‘eco-town’. This location does not seem to have been considered (see comments under ‘alternatives’ below).

### **Source of Waste**

The ‘proximity principle’ (Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011) stipulates that waste should be treated by the nearest appropriate facilities to ensure protection for the environment and public health.

- There is considerable concern within the FPC, reinforced by the above figures regarding excess incinerator capacity that already exists in Hampshire, that this incinerator will not be treating waste from Hampshire but will be taking it from anywhere in the country that pays the Applicant the highest price.
- The Applicant’s Regulation 25 response only serves to reinforce this concern when referring to *“750,000 tonnes of waste capable of being treated at an ERF was disposed of to landfill from these waste planning authorities”* [authorities bordering Hampshire]. Because *“none of the surrounding waste planning authorities have an operational ERF and rely primarily on either landfill or export of residual non-hazardous waste”*. It is therefore clear that the Applicant clearly sees this facility as a commercially driven

venture, despite attempts (incorrectly as noted above) to justify it as processing Hampshire's waste.

- The Applicant has not taken into account any upcoming provision in surrounding counties that might affect their figures. Neither has the Applicant provided any information on sources of waste from surrounding counties (or further afield) or what strategies other counties are adopting for their own waste plans.
- The source of supply of waste is fundamental to the need for an ERF in this location. Additional information should be sought from the Applicant to ensure that waste is not being transported from long distances as this would further undermine the sustainability credentials of the ERF claimed by the Applicant.

**It is clear to FPC that this proposal contravenes the 'proximity principle' and, without a clear picture of waste processing across the south of England, it is impossible to determine whether it is required at all.**

### **Replacement MRF**

FPC previously highlighted the fact that this application necessitated a replacement MRF to maintain Hampshire's long term waste management strategy. This must be considered ahead of this application to ensure that the County recycling rates do not deteriorate further.

- The Applicant now states in its Regulation 25 responses that *"the Proposed Development would only go ahead if the Alton MRF is replaced by a facility elsewhere in Hampshire. Furthermore, any new MRF would need to be fully operational before the Alton MRF is closed."* so with such a long lead time why is the Applicant seeking approval for an ERF on this site now?
- It is abundantly clear that with site identification, planning process, construction and commissioning required for a new MRF in Hampshire taking several years, the decommissioning of the existing Alton MRF and construction of the Alton ERF cannot commence for at least three years and a further three years before it will be operational.
- It must be assumed therefore that all the data the Applicant has submitted (both in terms of waste management capacity and Environmental data) will be out of date and could be non-compliant with legislation and standards in place at the time the ERF is finally operational. We feel therefore, that current data is therefore not a good basis for making a decision on a facility such as this.
- FPC would also question why, if the need is as urgent as the Applicant suggests, that other sites that are more immediately available are not being considered.

**FPC asserts that the Planning Authority cannot determine this application using data that will be out of date long before the facility is built.**

### **Sustainability**

Throughout the process, the Applicant has continued to assert that the ERF is sustainable and will be 'climate positive'. FPC contends that this is not the case as incineration even with energy recovery is an outmoded solution that is ultimately damaging to the climate and thus inconsistent with HCC's Climate Emergency announcement in 2019 and the UK Government policy both of which contain targets to be carbon neutral by 2050.

- The Applicant claims that the ERF will be “*low carbon*”, but a recent study for the Scottish Government found that “*decarbonisation of the grid has been so successful that Energy from Waste (EfW) technologies can no longer be considered as low carbon solutions*”.
- There is widespread evidence to suggest that (EfW) is actually damaging to the environment by:
  - a) Diverting recyclable waste from further up the waste hierarchy (see ‘*Recycling vs Recovery*’ above).
  - b) Failing to take advantage of combined heat and power opportunities to increase efficiency (see ‘*Heat Offtake*’ above).
  - c) Competing against lower carbon sources of energy generation for the electricity grid including existing solar farms that are providing renewal energy to area via the local distribution company who it is assume would be proposed power offtaker from this ERF as no grid connection application has been made to the National Grid by the Applicant.
- Hampshire County Council declared a Climate Emergency in 2019, setting a target to be carbon neutral by 2050. This includes strategies for decarbonising the grid/renewable energy and waste reduction/increased recycling. The three incinerators currently operated by the Applicant already contribute around 3.6% of all Hampshire’s CO<sub>2</sub> emissions which will increase to over 6% including the proposed Alton ERF.
- East Hants District Council (EHDC) have also declared a Climate Emergency. EHDC have a currently calculated output of 1,279 tonnes of CO<sub>2</sub>/km<sup>2</sup>. With the projected output for the Alton ERF, this will increase by 642 tonnes CO<sub>2</sub>/km<sup>2</sup> to 1921 tonneCO<sub>2</sub>/km<sup>2</sup>. This represents an increase of 50% over the current rate for the whole district.
- To be genuinely sustainable and reduce Green House Gasses (GHG), the Alton ERF would require ‘Carbon Capture Technology’ (CCS). The Committee for Climate Change says that “*Heat produced by unabated EfW plants (i.e. without Carbon Capture) is not particularly low-carbon*” and “*In a Net Zero world EfW facilities are likely to be significantly higher carbon than other forms of energy production.*” CCS technology takes up space and the Applicant has declined to incorporate such technology in the current design proposal.

## **Conclusion**

**It is clear from the foregoing that there is no ‘need’ in Hampshire for the additional incinerator capacity that this Alton ERF would deliver and the Applicant has declined to provide information on where it proposes to source the waste that is to be burned in this ERF.**

**From all information provided by the Applicant, it is clear to FPC that this facility is purely a speculative, commercial venture by the Applicant that will encourage more waste to be burned rather than recycled. As such, it is totally contrary to the stated objectives in the HMWP.**

**Despite the Applicant’s attempt to ‘greenwash’, this facility is using outmoded technology and will seriously compromise national and local Climate Emergency targets even if CCS technology is incorporated in the design.**

## ENVIRONMENTAL IMPACT

### Noise

FPC note that noise was not raised in the Regulation 25 requests, but that the Applicant has provided additional information in its responses.

- The Applicant states that the tipping hall doors would be closed except for when vehicles are accessing the plant. However, it is evident that at the current MRF, the tipping hall doors are open at all times that the plant is operational. FPC anticipate that a similar operating regime would soon be adopted at the new facility and the reversing sirens will be clearly heard at properties close to the site as they are at present.

**FPC again requests that should the Planning Authority be minded to approve this application, stringent noise limits are imposed and monitored at regular intervals.**

### Light

FPC notes the Applicant's statement on 'night operation mode' in their Regulation 25 response. However we would question how effective the management of this regime will be.

- It is stated that the control room will be one of the areas to remain lit throughout the night, but that blinds will be drawn to prevent light spill. As with many office blocks, the blinds are inevitably not drawn and as the control room is set on the 4<sup>th</sup> floor of the office block facing north, it will be very visible to residents in Upper Froyle. This will be particularly worse during the winter months.

### Ecology

FPC contends that the assessment of impacts from air pollution on European sites cannot be relied upon as non-traffic sources of emissions have not been included in the air quality model in the in-combination assessment. Consequently it cannot be concluded that there will be no adverse effect on Shortheath Common SAC and this assessment should be repeated using the correct data.

- The impacts of air quality on locally designated wildlife sites have not been fully addressed in the Environmental Statement (ES) with some potentially significant increases in the pollutant level or load being dismissed with no attempt at mitigation.
- Despite the Applicant's response, risks to the water environment from the operation of the incinerator remain of concern. The River Wey is a priority chalk river and is particularly sensitive to any changes or pollution of the local water environment.
- Potential impacts of the development on groundwater flows and water quality could have catastrophic impacts on this sensitive ecological habitat. Whereas some of these can be controlled through appropriate mitigation measures, the current design for an underground storage bunker containing contaminated waste that is below the water table and in hydrological continuity with this river appears to be inherently unsafe and should not be permitted until the risks have been sufficiently explored.
- It is noted that the Applicant is proposing to provide the offsite biodiversity 10% net gain through land they own at Abbey Fruit Farm, Newtown Road, Netley, Hampshire, more than 30 miles from the proposed development. It would seem to be particularly disrespectful to local residents that will have to put up with the proposed development for the up to 40 years to improve a piece of land so far away from the site.

## Water

The lack of site specific hydrological data and detailed risk assessments on aspects such as groundwater impact, dewatering during construction and piling risk assessments remain a considerable concern. They pose a considerable risk to the water environment, especially the River Wey, and have not been properly explored.

- The Applicant has supplied information regarding the risk from fire water contamination. They suggest that fire risk is minimal but we understand that Veolia have had 4 fires in 3 facilities since 2016.
- The Applicant has not addressed concerns highlighted by Hampshire Fire and Rescue Service regarding fire water run-off potentially polluting the River Wey.
- The Applicant claims that fire water run-off will be stored in an “underground tank” but this is not sized nor identified on any of the plans submitted.

## Emissions

As noted in FPC’s objection dated 14 August 2020, emissions remain a key concern for our residents and their health.

- FPC considers that the Regulation 25 response contains inconsistencies and flaws and does nothing to reassure residents.
  - a) The assessment relies heavily on forecast future reductions in NO<sub>x</sub> concentrations predicted by one (but not all) of the in-combination assessments referred to without any consideration of the concurrent forecast increase to NH<sub>3</sub> concentrations. The assessment is thus flawed.
  - b) The assessment relies heavily on forecast future reductions in NO<sub>x</sub> concentrations despite repeated claims that it is not reliant on these forecast trends. The assessment is thus misleading; and
  - c) The assessment claims that in-combination effects from live projects with emissions from non- traffic sources are included in the air quality model when they are not. This part of the assessment has not been provided.
- Further information is required regarding the emissions from the routine operation of the diesel generators and how these will combine with other scheme-generated emissions to affect annual mean concentrations.

## Traffic

Although the Applicant has provided a re-worked transport assessment as part of their Regulation 25 response, FPC still have significant worries on the effect of the quantity of additional HGVs on the local road network.

- As noted above, the Applicant has not ascertained precisely where waste will be coming from and any transport assessment by them at this time remains an entirely academic exercise.
- The Applicant states that the “majority of waste would be sourced from Hampshire”. However, in the previous Transport Assessment, 52% of the HGV deliveries were coming down the A31 from the west. There are no suitable feeder roads between the site and

the county border with Surrey in this direction, so this confirms that the majority of waste for the facility will not be coming from Hampshire.

- Previously the Applicant claimed that 3% of movements would be on weekends but the Regulation 25 response states that *“based on experience at similar plants only about 10% of deliveries take place over the weekend”*. This indicates that the frequency of weekend deliveries have tripled since the initial transport assessment.

## Conclusion

**There remain many inconsistencies and inaccuracies in the submitted Environmental data. The Applicant seeks to defer many issues to either Planning Conditions or the Environmental Permitting Process which delays the proper consideration of some critical environmental aspects of this application. FPC would ask that the Planning Authority requests further clarification and considers simultaneous EA Permitting in order that these significant issues are brought into the planning decision.**

## OTHER ISSUES

### Alternative Sites

FPC notes that the Applicant has failed to consider other alternative sites as required by the Scoping Opinion, and the EIA Regulations, stating that they *“have not given any material regard to alternative sites”* citing commercial reasons.

- Nevertheless, all three of the Regulation 25 notices specifically requested that the Applicant provided justification of the choice of site as a *“fundamental matter”*.
- The Applicant has now submitted an inadequate and incomplete study in which they have sought to reverse engineer the argument to justify Alton as the most appropriate site. To this end they have used an HCC study of potential waste sites prepared nine years ago, and made no attempt to update or expand it to include sites within the catchment area (including those outside Hampshire) that are currently suitable and may now be available. FPC is unaware whether the Applicant was provided an updated list of available sites for its consideration by HCC.
- FPC would bring to HCC Planning’s notice that this 2009 report , specifically excludes the Alton site for uses that would include a stack. It states that any proposed use with a stack *“would have to be justified”*, which the Applicant has not done for this ERF.
- The report also included many other sites, some of which would be ideally suited for an ERF. For instance Whitehill Bordon, where the AERF could be integrated into wider development and a heat distribution network utilised to displace gas boiler heating, considerably reducing GHG impact of an ERF (see *‘Heat Offtake’* above) This location would be far better than the Alton site but was ignored by the Applicant in its *‘alternatives’* study.

## Conclusion

**The Applicant has not made a full and proper assessment of alternative sites in accordance with the EIA Regulations. Due diligence should have been undertaken at the start of the process and is a serious omission that undermines the planning process.**

**FPC considers that, by not providing any justification for using the Alton site with a stack, the Applicant has invalidated the Alton site for consideration.**

## Socio Economic Impact

The Applicant's coverage of 'Socio Economic Effects' in the Clarification Letter of 14 December makes no mention of employment or the impact on local businesses raised in FPC's original objection.

- FPC remains concerned that the implications for local businesses and employment will be severe, in particular:
  - a) Impact of air quality on the organic status of Mill Farm and Jenkyns Place vineyard which operate downwind of the site.
  - b) Air quality and visual impacts on West End Farm immediately north of the site where the ES identifies areas where process contribution for hourly mean nitrogen levels exceeds 10% of the AQAL.
  - c) Air quality and visual impacts on Hen & Chicken Pub, Froyle Park and Hawbridge Farm Wedding Venues that rely heavily on their location and the unspoilt views across the Wey Valley.
- The Applicant has also not acknowledged or corrected their misleading statement in the original submission, that the project will create 40-45 permanent jobs, ignoring the fact that 65 jobs will be lost at the MRF resulting in a net reduction in GVA to the local economy.

**The damage to the local economy will be significant and we believe this should be considered further in HCC assessment of the application.**

## SUMMARY

Froyle Parish Council continued to **STRONGLY OBJECT** to this application as:

- The Applicants have not provided any additional information in their Regulation 25 submissions that changes our previous conclusion that the proposed ERF will have adverse impacts in terms of visual impact, need, sustainability, and environmental impact.
- There is no justification for an ERF in this location and it will only harm the local countryside, environment and businesses, whilst providing no benefits.
- Evidenced by the Applicant, no work on this site can commence until a replacement MRF is operational. This application should be withheld until the location of the new MRF has been determined and permissions granted. It can then be properly considered with full regard to the strategic need and requirements for waste capacity in Hampshire at that time.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Andrew Potter', with a long horizontal flourish underneath.

Andrew Potter

Clerk and Responsible Financial Officer to Froyle Parish Council

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