

Hampshire County Council

Our Ref: SDNP/20/02878/ADJAUT
Contact Officer: Rafa Grosso Macpherson
Tel. No.: 01730 819336

14th August 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjoining Authority Consultation from Hampshire CC, Case Ref: PLAN/SD/EH141 -
Development of an Energy Recovery Facility and Associated Infrastructure.

Address: Alton Materials Recovery Facility, A31, Alton, GU34 4JD

Thank you for your correspondence received 9 July 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

The two statutory purposes of the National Park are:

1. Conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public.

All relevant authorities (which includes local planning authorities) must have regard to these statutory purposes when exercising their functions.

The National Park also has a duty to seek to foster the economic and social well-being of local communities within the national parks.

This application relates to Veolia's application for planning permission for the development of an energy recovery facility and associated infrastructure in Alton, GU34 4JD. The applicant benefited from pre-application advice given by the South Downs National Park Authority (SDNPA) in February 2020 - Reference SDNP/19/05894/PRE. The pre-application advice letter is still relevant and this consultation response should be read in conjunction with it. This can be found here:

<https://planningpublicaccess.southdowns.gov.uk/online-applications/>

Whilst the application site is not sited within the boundaries of the National Park, the site lies only approximately 1,200 metres from it. The SDNPA has evaluated the potential impact that the proposed development would cause to the National Park, its setting and the overall environment. Comments are below.

Summary

This is a large proposal on the edge of the South Downs National Park. Following a review of the submitted documents the effects upon the National Park are primarily:

- o Negative effect upon characteristic views and visual amenity
- o Negative effects upon the character of the setting of the National Park.
- o Negative effects caused by lighting.

It is considered that whilst the area of the National Park affected will be limited, in some cases the change, particularly the change to views from within the National Park or its setting are likely to be significant due to the excessive scale of the facility and chimney stacks and its prominence in the Wey Valley.

The LVIA has not assessed all the potential effects, the details of which are discussed below. Those missing include:

- o All visual effects - ruled in or out based upon the ZTV evidence provided.
- o Effects of lighting both upon the perceptual/visual qualities of the landscape.
- o Effects upon this cultural landscape and an understanding of its contribution to the setting of the National Park.

Information submitted - LVIA

The Baseline evidence is not comprehensive and fails to generate a meaningful understanding of the landscape and particularly its importance culturally/historically. It also does not tackle the issue of the setting of the National Park, in landscape or visual terms. As a result, this landscape may be more sensitive than is accounted for in this assessment.

The LVIA also appears to miss some viewpoints within the SDNP. These are areas shown as potentially having a view of the proposal from sensitive locations, as highlighted on the application's supporting ZTV (DSM). These may have been ruled out through the process and whilst some are mentioned, no assessment has been undertaken, nor images included. Overall these gaps make it difficult to judge the likely visual effects. Viewpoint 6, right on the edge of the National Park, will provide a full view of the building and chimney stack. The other viewpoints provided in the LVIA offer a view of the chimney only from within the SDNP. The 'missing' viewpoints may provide a view of both, based upon the ZTV. However, based on what has been provided, it would appear that the proposal has the potential after to mitigation, to generate significant negative visual impacts upon views from within the National Park and its setting.

The mitigation measures provided are a significant living wall along the southern elevation of the building. If successful and planted appropriately, this will help to mitigate visual effects from within the National Park. The final treatment of the chimney stack will be critical to further minimising the effects of such a large structure.

Study Area

The Study Area has been defined at an extent of 10km from the site. This is supported as long-distance visual effects may well be possible from within the South Downs National Park.

Landscape Baseline

The Landscape Baseline in the LVIA, is discursive in places and not comprehensive - outside of the SDNPA, and somewhat lacking in regard to the National Park. Whilst the impact upon the landscape resource is occurring outside the National Park, some evidence and commentary would be expected in relation to determining what constitutes the setting of the National Park, and whether or not the site contributes to its landscape setting.

Visual Baseline

A key Viewpoint along a promoted route - the Writers' Way - part of the Jane Austen Country (and others) experience has not been included in the LVIA, despite it being clearly covered by both DSM and DTM ZTVs. <https://www.hants.gov.uk/thingstodo/countryside/walking/writersway> This is a significant omission based upon the applicant's own submitted evidence and should be covered so SDNPA can consider the effects from this important route, designed for people to experience the same landscape which inspired some renowned cultural figures.

The ZTV suggests views from Selborne Common are also possible, this is close to both the Writers' and Hangers Way and is not included as part of the assessment. As above, if a view is possible could it be included in the assessment. Similarly, other potential viewpoints to the south and east have been ruled out from the LVIA such Noar Hill (near Selborne), high ground levels between Alton and Alice Holt Forest (such areas near Wheatley, Stubbs Farm and South Hay Farm), and other more distant areas along the 10km radius.

The setting to the National Park has not been defined in the Baseline evidence. The setting to a Protected Landscape can be defined as a landscape setting or visual setting, or a combination of both. The setting is important particularly in defining and contributing to the perceptual qualities and experiences people have within the National Park and particularly close to its boundary. The South Downs View Study expresses where the visual setting is important and describes its character. The Site lies within this setting and therefore the condition and quality of the landscape here directly affects the National Park.

Assessment of impact

Should the landscape and/or visual setting have been determined as part of the baseline evidence - and its value and sensitivity established, the effect of the proposal could have been assessed against this. The landscape here is described in the Landscape Baseline as ordinary countryside and not-distinctive, yet from the National Park point of view it performs a key role in its visual setting and possibly its landscape setting also. This setting is also key in terms of experiencing this important Writers' landscape - which is not just within SDNP, it takes users right through Alton. Overall the Baseline evidence is not complete and potentially effects may be greater/more numerous as a result.

The LVIA identifies those views from which a significant effect will arise. The following viewpoints in/close to the National Park are considered in the EIA to receive a significant impact from the proposals:

- o Viewpoint 6 nr. Wyck.
- o Viewpoint 10 nr. Binsted. (Outside of the National Park)
- o Viewpoint 11 Hangers Way. (Outside of the National Park)

The identified significant effect upon receptors is agreed. It is worth bearing in mind that these effects are likely to be replicated throughout this part of the National Park, albeit mostly as glimpsed or partial views.

Other viewpoints close to the SDNP or within its setting also generate significant adverse effects for these users, who may begin or end their route in the National Park. However, the LVIA concludes no significant visual effects upon the National Park will arise. This result does not seem accurate based upon the evidence provided in the LVIA.

The SDNP View Characterisation Study (2015) defines aims and objectives for conserving and enhancing views from the Hangers Way (this may cover land within or outside of the National Park). (Viewpoint 11 is on the Hangers Way right on the National Park boundary). The proposal is contrary to these aims and objectives, and whilst defined as a moderate adverse effect - perhaps given the notable importance in these views picked up in the View Study, the effect upon people's experience here could be considered Major. Whilst the LVIA refers to this document the proposal does not appear to have applied any of its guidance.

A Lighting Assessment was included in the EIA demonstrating that the lighting scheme of the proposed development is compliant with the Institute of Lighting Professionals, 2011 Guidance Notes for the Reduction of Obtrusive Light for National Park receptors. Therefore, given that the Dark Sky Core is located approximately 8 kilometres to the south of the site and that the lighting scheme for the building would be compliant with the ILP Environmental Zone E1 criteria, the proposal is likely to conserve the intrinsic quality of the dark night skies and the integrity of the Dark Sky Core.

Notwithstanding the above, and in addition to the missing viewpoints, there is no night-time visual impact assessment provided, therefore there is no assessment of the impact of lighting upon the National Park in visual impact terms or in terms of effect upon perceptual qualities such as tranquillity. Lighting has been identified as a negative tranquillity factor in the EIA but the development has not tackled this in the proposal. It would be anticipated, given the prominence of the site and the visibility from several public vantage points, to cause a detrimental impact to tranquillity and visual amenity during dark hours. Of particular interest is any lighting of the chimney stacks and how this would adversely affect views and tranquillity of the National Park and its setting. This hasn't been assessed in the EIA and suitable mitigation would be required should planning permission be granted.

The main concern with the proposed development arises from the excessive scale of the building, as it would be of 40 metres of height and the chimney stacks would reach 80 metres, being a prominent feature in the landscape which would be alien to its character and appearance due to its excessive scale and bulk. Officers acknowledge the efforts made to create a building of some organic form and green walls, which help to mitigate some of the harm. Unfortunately, the scale and bulk of the building result in unsympathetic views with the landscape character of the Wey Valley and harm is identified to the setting of the National Park.

Conclusion

The SDNPA consider that deficient supporting evidence has been submitted with the EIA and the planning application, as identified above, to complete the assessment of this development proposal and its impact on the value of public views within the National Park and its setting. Without the benefit of that assessment, the SDNPA is unable to work out a mitigation to eliminate or reduce the impact on the National Park.

The SDNPA recommend that the Local Planning Authority seek the missing information in the LVIA, as stated above, and re-consult the SDNPA for further assessment.

In the absence of the above, the SDNPA object to the planning application as the development proposal has failed to demonstrate that it would positively respond to the setting of the National Park's landscape character. The LVIA has not analysed the impact of the proposed development within areas where views are likely to be achieved. Some of which, are of importance and the proposed development, by reason of its excessive scale and prominent location would lead to harm to characteristic views and tranquillity of the National Park.

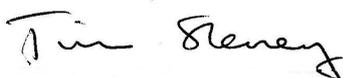
If there are any material changes to the proposals, or you would like further advice in relation to the National Park, please contact us.

Conditions

If permission is granted conditions should cover the following design details in order to minimise negative effects upon the National Park and its Purposes. SDNPA would request to be consulted at the discharge of conditions stage.

- o Species used in the green wall should be similar to surrounding landscape vegetation in colour/tone and not be too green or eye catching in long distance views.
- o Colour of the rest of the building. The chimney stack seen from different vantage points may be seen wholly against the sky or part against the land, part against the sky. This makes colour difficult to achieve well, but a detailed visual assessment should help to inform the colour - which crudely may involve darker colours at the base. Generally speaking, avoiding white tones or light greys in buildings, as these tend to draw the eye.
- o Lighting, in addition to adhering to best practice standards, lighting design should be kept to an absolute minimum in order to protect the National Park's International Dark Skies Reserve status. Lighting should not negatively affect this designation, nor the experiential qualities of this protected landscape.

Yours faithfully



TIM SLANEY

Director of Planning

South Downs National Park Authority

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