

# **Landscape response to Hampshire County Council Minerals and Waste LVIA Scoping:**

**To:** Sam Dumbrell, Principal Planning Officer, Hampshire County Council

**From:** The Landscape Planning Group, Economy, Transport and Environment, Hampshire County Council

**Date:** 18/09/20

**Application ref:** 33619/007: Site reference EH 141 Energy Recovery Facility and Associated Infrastructure at Alton Materials Recovery Facility, A31, Alton GU34 4JD

**Description:** Proposed Development of an Energy Recovery Facility, at Holybourne, replacing the existing Material Recycling Facility and Waste Transfer Station on land off the A31 nr Holybourne.

**Address:** Land off the A31 nr Holybourne

**Type of Consultation:** EIA – Planning Application

**Summary Response:** Holding Objection

## **1.0. Introduction**

**1.1** These comments are a response to the landscape and visual effects associated with the proposed development of an Energy Recovery Facility on land south of the A31 to the east of Alton, Hampshire. The site is a small area of land between the main A31 road to the north and the Alton line railway to the south. This land was part of a former railway sidings and housed a Cold War buffer station. The site is currently developed and contains a Materials Recovery Facility building and surrounding infrastructure. The existing building sits low in the landscape and from the A31 is largely enclosed by the existing vegetation.

**1.2** The Environmental Statement submitted with this application is considered a thorough document, and the assessment of effects generally a fair evaluation of the significant impacts that this development would have on the landscape setting. There are sections of the Landscape and Visual Impact Assessment which appear to underestimate the effects of the development as it is currently proposed, however, it is noted that the assessment prepared by the applicant does not find any beneficial visual effects of the proposed development.

## **2.0 Landscape Planning Policy**

### **National Planning Policy Framework (NPPF) Rev 2018**

**2.1** The following clauses in the NPPF are considered to be key in relation to landscape and visual matters:

*“Para 127. Planning policies and decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);...”*

*“Para 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”*

### **Hampshire Minerals and Waste Plan Adopted 2013: Relevant Policies**

#### **2.1. Hampshire Minerals and Waste Plan Policy 5:**

*“Policy 5: Protection of the countryside*

*Minerals and waste development in the open countryside, outside the National Parks and Areas of Outstanding Natural Beauty, will not be permitted unless:*

- a. it is a time-limited mineral extraction or related development; or*
- b. the nature of the development is related to countryside activities, meets local needs or requires a countryside or isolated location; or*
- c. the development provides a suitable reuse of previously developed land, including redundant farm or forestry buildings and their curtilages or hard standings.*

*Where appropriate and applicable, development in the countryside will be expected to meet highest standards of design, operation and restoration.*

*Minerals and waste development in the open countryside should be subject to a requirement that it is restored in the event it is no longer required for minerals and waste use.” (page 41, Hampshire Minerals and Waste Plan adopted October 2013)*

Whilst the proposed development is not located in a protected landscape it is considered to be within an attractive landscape in its own right and is well used for walking and recreation. It is also a landscape that provides a setting to the South Downs National Park and the scale and bulk of this development will be visible and impact on the character of this landscape. Regarding Clause c) of the Hampshire Minerals and Waste Plan Policy 5, whilst this development would be located on previously developed land, it is considered that because of the countryside setting, and scale of the development as currently proposed, this development would not represent a suitable reuse of this land in terms of its landscape and visual impacts.

#### **2.2 Hampshire Minerals and Waste Local Plan Policy 13:**

*“Policy 13: High-quality design of minerals and waste development*

*Minerals and waste development should not cause an unacceptable adverse visual impact and should maintain and enhance the distinctive character of the landscape and townscape.*

*The design of appropriate built facilities for minerals and waste development should be of a high-quality and contribute to achieving sustainable development.”*

*In order to demonstrate that the key design and operation principles are met, all minerals and waste developments should:*

*be appropriate in scale and character in relation to its location, the surrounding area and any stated objectives for the future of the area. This should include any planned new development or regeneration;”* (page 53, Hampshire Minerals and Waste Plan Adopted October 2013)

Policy 13 in the Hampshire Minerals and Waste Plan requires the design of minerals and waste development to be of an appropriate scale and character in relation to its setting. This site is relatively visually exposed and can be viewed all around. It is considered that the proposals in terms of their scale and character as currently shown would adversely affect the character and appearance of the rural countryside.

## **East Hampshire Local Plan Relevant Policies**

**2.2** The principal relevant policy in the current East Hampshire Local Plan is:

***“CP29 Design***

*The District’s built environment must be of an exemplary standard and highly appealing in terms of visual appearance. All new development will be required to respect the character, identity and context of the district’s towns, villages and countryside and must help to create places where people want to live, work and visit. New development will be required to:*

*d) ensure that the layout and design of development contributes to local distinctiveness and sense of place, and is appropriate and sympathetic to its setting in terms of its scale, height, massing and density, and its relationship to adjoining buildings, spaces around buildings and landscape features;*

*e) ensure that development makes a positive contribution to the overall appearance of the area by the use of good quality materials of appropriate scale, profile, finish, colour and proven weathering ability;”* (page 71, East Hampshire Local Plan (Joint Core Strategy Adopted June 2014)

**2.3** East Hampshire Emerging Local Plan, has a similar policy on Design with regards to the scale, height and massing of a proposed development:

*“Policy S27.1 New development will be permitted where it would help to establish a strong sense of place, by reinforcing or enhancing local character, and would function well with its surroundings. This means that development proposals should:*

*a) respect or improve the local built environment and landscape setting through the siting, scale, height, massing, roof design and density of proposed buildings and structures;”*

- 3.0. Detailed comments on Chapter 5 - Landscape and Visual Effects Environmental Statement
- 3.1. In the Landscape and Visual Impact Assessment – ES Volume 1 2627 05 LVIA Final - the various Landscape Character Assessments are set out in detail from the National Character Assessment, the County and National Park Assessments to the District Council level. In Clauses 5.4.13 – 5.4.48 large sections of the relevant documents are reproduced. Section 5.5 analyses the effect of the proposed development and in clause 5.5.26 it states that *“There would be an appreciable increase in the influence of built development locally, and the Proposed Development would become a new characteristic feature of the landscape immediately surrounding the Site. Locally, effects would be moderate to major adverse, and would be significant.”* The views of the proposal shown in figures 14 and 24 clearly show the impact on the local landscape character. Whilst it is accepted that there are pylons within view in this landscape, their effect on the character cannot be compared to the effect of the proposed development. The pylons are tall (up to 50m high) but they are visually permeable whilst the proposed development structure presents a large unbroken mass of approximately 200m long and 85m wide in this landscape. In ES Volume 3 Appendix 5.5 Effects on Landscape Character, there is an in-depth analysis of the impacts of the proposal on the Hampshire Landscape Character Area 3f Wey Valley. In this document it states that *“Locally, a moderate to major level of effect would occur due to the increased prominence of built development at the Site”*. It is considered that the local effect should be major. However, this analysis does state that the effect is *‘Significant’* and the development will be *‘Adverse’* i.e. the most severe level of impact on landscape character. The landscape character assessment does not take account of the effects of the plumes of smoke from the proposed chimneys and the extent these would affect, in particular on the South Downs National Park.
- 3.2. The landscape assessment describes the landscape character as *“ordinary countryside,”* however, as the development is within 1,200 metres of the Park Boundary, it would impact on the setting of the South Downs National Park. This landscape carries the highest landscape designation and the LVIA does not fully assess the effects on this area. In particular, the effects caused by the chimneys and night lighting which would impact the perceptual and tranquillity qualities of the National Park.
- 3.3. In the ES Volume 3 Appendix 5.6 Effects on Viewpoints, each viewpoint is detailed and the effects of the proposals analysed. The photographic views which accompany this analysis are shown in ES Volume 2 Viewpoints 1 - 24 (Views 22 and 23 are not detailed). These photographs show the existing view and the proposed view with photomontages of the proposed development. In appendix 5.6 it states that there will be an *‘Adverse’* visual effect on 13 of these viewpoints and the impact is considered to be *‘Significant’* on 7 of these views; these are view 5, 6, 9, 10, 14, 18 and 24. The properties that will be most affected are Hawbridge Cottages and Hawbridge Farm (see viewpoint 5), which are located on higher ground just to the south of the proposed development. To the north of the A31 there are a network of footpaths and bridleways that start in and around Holybourne, these include the long-distance St Swithun’s Way footpath. As evidenced by the level of wear and tear, these paths appear to be very well used by walkers many of which are assumed to be local residents. Therefore, the *‘Significant’*

Adverse' visual impact of this development will be clearly seen by those walkers who regularly use the paths in the vicinity. It is noted that none of the photomontages show a plume of smoke coming out of the chimneys, however the modelling within the ES shows that it is likely to be visible between 9 – 13.5% of daylight hours. This will further highlight the presence of the building and chimneys. No assessment has been carried out of the night-time illumination of the chimneys and the effects this might have on the plumes emitted. It is considered that these effects should be assessed. It is noted that the LVIA prepared by the applicant does not find any beneficial visual effects of this development.

- 3.4. The South Downs National Park Authority has highlighted that the visual assessment does not address the effect of the proposed development on several paths within the Park, which they believe will have a view. The effect on these paths should be addressed.
- 3.5. The layout, form and appearance of the development proposals has evolved since the EIA Scoping opinion was sought in 2019. The proposed outer cladding walls combining green walls and light-coloured cladding make the appearance of this building more acceptable. However, it is considered that these mitigation measures may not overcome the main landscape objection to this proposal, namely the excessive scale of the building, its bulk and the negative effect this will have on this countryside location and the Wey Valley.
- 3.6. Whilst the site is located adjacent to a layby on the edge of the A31, it is in a rural location and is considered too small to accommodate such a large building. It is accepted that tree and shrub planting around such a tall building will never completely screen the building, but there should be space on the site to place the building in a landscape that is commensurate with the scale of the development, if in a rural location. This would allow room for ground modelling and planting on a large scale that could help to soften the impact of the development and design in features that would reflect the local riverine landscape character. The assessment of the proposed development's landscape and visual impact relies on existing planting to the north east and west which is outside the site boundary. This planting is currently beyond the control of the applicant. It is considered that its future loss would have a significant negative impact on the development's landscape and visual impact. The proposed planting on the south side of the site occupies a narrow strip, comprising 2 metres of grassland and a 2 metre wide hedgerow with trees. It is considered that this would not be sufficient to soften the impact of the proposed development, particularly for the residents at Hawbridge Cottages and Farm. In addition, as this boundary is adjacent to the Alton Railway line, it is assumed there will be restrictions placed by Network Rail on the size obtained by trees and growth on the trackside.
- 3.7. As currently proposed, other than a very small triangular area at eastern end of the site (approximately 7 - 8% of the site), the whole of the site would be taken up with buildings, chimney and hard surfacing. Softening the appearance of the building relies significantly on the use of green walls. There are a number of concerns with the use of this system. There are currently no details of what would be planted on these walls. These systems generally comprise ornamental plants and it is considered that these would not be in keeping with this rural location. As part of the ongoing mitigation strategy for the building, the planting must remain in good condition throughout its life. This planting will require a significant amount of maintenance and regular replacement of plant material, for it to remain looking acceptable.

Should the Local Planning Authority be minded to approve this application, then detailed planting establishment and 25 year management plans will be required as a condition of approval, including the green walls.

- 3.8. The proposed cable route to the Alton substation is not detailed to any extent. The development cannot take place without a connection to the grid and therefore this element of the proposal should be detailed at this stage. It is suggested that the cable will be buried in the verges along the A31. These verges are well vegetated and, in many locations, have well established semi-mature and mature trees. Burying the cable could affect the rooting zones of the trees and make them unstable. A detailed analysis of this route and the possibility of either boring or hand digging trenches is necessary.

#### **4.0. Conclusions**

- 4.1 The design of this scheme has evolved significantly since the EIA Scoping report however there are still strong concerns about the visual and landscape impact of the development proposals. Whilst the undergrounding of part of the building, and the proposal to have green walls have improved the visual appearance, it is considered that these changes are unable to overcome the fact that the layout, form and appearance of the development proposals as currently proposed are not appropriate to the scale and landscape setting of the site.
- 4.2 The proposals as they currently stand do not fully comply with the Hampshire Minerals and Waste Plan Policies 5: *Protection of the Countryside* and Policy 13 *High quality design of minerals and waste development*. These policies require development to be appropriate in scale and character in relation to its location.
- 4.3 East Hampshire Local Plan has similar policies; Policy 29 and (Policy S27.1 in the emerging plan) require new development to reflect '*local distinctiveness and sense of place, and is appropriate and sympathetic to its setting in terms of its scale, height, massing and density, and its relationship to adjoining buildings, spaces around buildings and landscape feature*
- 4.4 The landscape assessment has taken little account of the impacts on the setting of the South Downs National Park. The chimneys will be clearly visible from a number of locations in the Park, and both the night lighting and the effect of the plumes have not been considered in particular in relation to their effect on the perceptual qualities and tranquillity of the landscape. This area needs to be addressed before full landscape conclusions are made.
- 4.5 The connection to the Grid is not detailed. This element of the development proposals could have significant negative effects. This area needs to be addressed before full landscape conclusions are made. Without this required information, the impact on the local landscape cannot be fully assessed and a holding objection is raised, until this cumulative impact is assessed.
- 4.6 As recognised by the Landscape and Visual Impact Assessment prepared by the applicant, the proposals as they currently stand have negative impacts on both the landscape character and visual effects. This is due to the scale, size, appearance and massing of the proposal and the long-term permanent landscape and visual impacts. The site is considered to have limited capacity to absorb a development of the scale currently proposed. There are some very significant issues to resolve to render this scheme acceptable in landscape terms. The

development proposals rely substantially on the existing vegetation that is to be found outside the site boundary to sufficiently mitigate against the landscape and visual impacts as there is no room within the site to carry out planting of the size and extent required. The applicant has no control over this vegetation and the mitigation it provides currently could be compromised at some future point.

- 4.7 There are concerns about the type of planting proposed on the green walls and the long-term commitment to its maintenance and renewal of plants as necessary. This scheme relies on the green walls continuing to flourish.
- 4.8 The Landscape Planning team puts a holding objection on this development until the additional information has been assessed.

Landscape Planning Team HCC 14/10/2020