

## **Response from Selborne Parish Council to the following application:**

### **33619/007 Alton Advanced Energy Recovery Facility at land off A31 Alton**

Selborne Parish Council submitted an objection to this application on 14<sup>th</sup> August 2020. Having reviewed the further documentation submitted by the applicant in December 2020, Selborne Parish Council continues to **STRONGLY OBJECT** to this application and comments as follows:

#### **1. Landscape**

Our objection to the proposal on landscape grounds has not been changed by the new information and still stands. The buildings remain the same as in the original proposal, so it is still a vast bulk mass, 40m high with chimneys 80m high, which cannot be hidden and will clearly be visible for miles around. It remains an industrial development of excessive scale which will be prominent in the landscape for many miles around.

Hampshire's Mineral and Waste Plan (policy 13) states that development "should not cause an unacceptable adverse visual impact and should maintain and enhance the distinctive character of the landscape". The additional information does not satisfy this, as clearly a building of this height and bulk in the open countryside must cause an unacceptable adverse visual impact.

The developer has now supplied a number of photographs taken from footpaths, but it is difficult to determine which ones are relevant, as some look away from the development. There are no artist's impressions to show the effect of the proposal on public footpaths. The photographs do however, show a gently undulating rural landscape, often with long views unimpeded by urban or industrial development. For example, there is a photograph taken from the top of the internationally famous Zig Zag path in Selborne showing unspoilt country views into the distance and another from Northfield Hill, but neither show the effect of the proposed site with its high chimneys and plumes.

#### **2 Transport** – The B3006 has been removed from the HGV routes in the new Highways Technical Note on Transport. On the initial Transport Assessment it stated that 18 HGV's would come through Selborne village every day. The new Technical Note does not explain which routes those lorries will now need to take to access the site instead of using the B3006.

In the Highways Technical note 2.4.3 it states that *"many of these routes eg B3004 and B3006 for example will by their nature deter large vehicles....."*. It goes on to say that *"nonetheless, and as a way to provide additional comfort to HCC and other commentators that development-related HGVs will not travel along unsuitable routes through villages close to the site, it is suggested that this can be regularised through a S106 Agreement, whereby a routing strategy is imposed to prevent HGVs using these routes"*. The map included in the Technical Note shows a blue cordon around the site to show the proposed routes that will not be used by HGV's. Although the B3004 is included within the cordon, the B3006 is not.

Selborne Parish Council submits that the B3006 should be included within the s106 and the blue cordon to prevent HGV's use of the unsuitable rural road through the heart of the historic village of Selborne.

It is also noted that 12% of HGV's appear to be accessing the proposed site from "other routes". This is a high percentage to be just called "other routes". The applicant should give further explanation of how the 12% of lorries are to access the site if they are not using the specified A roads. Assurance must be given that those HGV's will not be using unsuitable roads.

The application appears to make no provision for a safe and unobtrusive holding area for lorries which may arrive before operating times.

#### **3. Environment**

a) Lighting: the new information shows the main lighting being on from 7am – 7pm. In the autumn and winter many of these operating hours will be dusk or dark, so there will be light spillage which will reflect

and be clearly visible in the sky from within the South Downs National Park, so damaging the Dark Night Skies. It would seem that as the first lorries are expected to arrive from 7am, the lights will need to be on earlier than specified in any event.

- b) In spite of the information provided there remains the very real possibility of contamination of the River Wey and / or the principal aquifer from the operations at the site.
- c) The high level of HGV movements will create contaminants for the whole length of their journey. The possible pollutants from the chimney stacks is still of concern, as is the visual contamination of the sky by the plumes. Neither of these aspects have been adequately addressed by the new information. The height of the chimneys and the visual impact of the plumes will be immensely damaging to the countryside of northern Hampshire and southern Surrey, on the residents and the recreational users of the area for many miles around.
- d) There appears to be still no comprehensive study on the impact on the provisions for recycling in this area if the Alton site were to become an incinerator instead.
- e) It is not clear that the waste for the proposed incinerator will not consist of materials that could actually be recycled, or where the sorting of the waste will take place.

#### **4. Alternative sites**

The developer has only given minimal consideration to a very few existing waste sites within Hampshire. The applicant has not considered alternatives such as major brownfield sites within Hampshire/Surrey or indeed anywhere further afield which might be closer to the source of the waste. A significant amount of HGV traffic is shown as coming from Surrey and beyond. The maps in the new Highways Technical Note reach to the borders of Greater London, and there is detail on waste coming from Farnham, so it is to be assumed that a considerable amount of waste will come from outside Hampshire. As there has been no provision of a full and comprehensive study of all possible alternative sites in the south east, Selborne Parish Council considers that the application in this very sensitive setting, should be refused.

**Selborne Parish Council reaffirms its objection to this application and recommends that it is refused.**

**Jane Ives, Clerk**

**For and on behalf of Selborne Parish Council**

**29<sup>th</sup> January 2021**