

# Landscape planning advice for Hampshire County Council

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

**From:** Landscape Team, Hampshire County Council

**Date:** 21/02/2021

**Application ref:** 33619/007: Site reference EH 141

**Description:** Proposed Development of an Energy Recovery Facility, at Holybourne, replacing the existing Material Recycling Facility (MRF) and Waste Transfer Station (WTS) on land off the A31 near Holybourne

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

**Type of Consultation:** Full Planning Application with EIA

## Summary Response: **Objection**

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### General Description of Proposals

#### Introduction

This landscape planning assessment of the **proposed development** follows a previous assessment by the Landscape Planning Team on 18 September 2020, where a holding objection was recommended. This response is based on an assessment of the additional information provided by the applicant on 14 December 2020, with reference made to the previously submitted information where relevant. The total information submitted by the applicant constitutes a competent and essentially comprehensive assessment of the Landscape and Visual impact of the proposed development. Following a review of the additional landscape related documents submitted, an **objection** is recommended on landscape grounds. This assessment response is set out as follows:

- 1) Brief reminder of site context and key development proposals.
- 2) Comments in relation to impact of the proposed development on the landscape character.
- 3) Comments in relation to visual impact of the proposed development.
- 4) Comments on the building design in relation to landscape context.
- 5) Comments on the details provided on the landscape design.
- 6) Summary Conclusions.

#### 1) Key site context and development proposals

- 1) The constrained development site sits within the distinct valley floor of the River Wey. It is bounded to the west by the A31 and to the east by the Railway line and lies approximately 2km to the north-east of the town of Alton. An oil terminal (the Alton Pumping Station) is located to the immediate west of the site. To the west of the pumping station is the IGas Holybourne Oil Terminal. The River Wey is located approximately 130m to the south of the site beyond the railway line. Between the site and Alton, at approximately 600m south west, lies the settlement of Holybourne. Outside of Holybourne and Alton, the surrounding land is largely agricultural, with the occasional farmhouse/ rural dwelling. Agricultural fields

lie to the north of the A31, to the east of the site and to the south of the railway line. The landscape of the surrounding area is defined by the valley of the River Wey and the surrounding undulating downland topography. Land cover is a mixture of fields enclosed by hedges and tree belts, and small woodlands. Further hedges and tree belts often run alongside roads and public rights of way, creating a sense of enclosure along these routes and within the wider landscape. The Wey valley itself is a corridor for a series of linear infrastructure: the A31, railway and pipelines. Electricity pylons and overhead lines are also present.

- 2) The boundary of the South Downs National Park lies approximately 1.2km to the south and east of the site.
- 3) The site is designated within the Hampshire Minerals and Waste Plan (Adopted 2013) as a major strategic waste recycling site, reference EH 141 and is currently occupied by the existing Veolia MRF and WTS. The main building on site has a height of approximately 15m above ground level. The site boundary is largely defined by hedgerows and trees. There is an open area of amenity grassland within the site to the east of the main building. This area also includes two small reedbeds in the north west corner of the site, used for the treatment of water arising from the MRF and WTS.
- 4) The proposed development comprises demolition of the existing MRF and WTS; a new building of max roof height 40m; twin emission stacks 80m high; associated ancillary developments including internal access roads, parking, drainage, and lighting; landscape treatments and temporary construction compound. The introduction of the proposed development would result in the removal and replacement of the existing buildings and ancillary structures with the new facility. The extent of hardstanding would increase, with an associated reduction in the extent of the grass areas in the eastern part of the site. Perimeter vegetation would be largely retained, although there would be some localised losses to accommodate the car parking and extended hardstanding along the northern boundary, and the weighbridge close to the western boundary. The new building would include a living wall on the northern and southern elevations and on the eastern elevation and roof of the tipping hall.

## **2) The Development's impact on Landscape Character**

- 2.1) It is considered that the additional information (submitted 14 December 2021) demonstrates that the proposals do not exert an adverse impact on the landscape character of the South Downs National Park as a whole, which is the highest national landscape designation, although it does have localised impacts to the northern edge of the Park, as described:

*“The Proposed Development does not lie in an area identified as being visually sensitive in relation to the National Park's setting in the View Characterisation and Analysis (VCA) Study. However, the assessment does acknowledge that the development would affect the Park's setting from some areas to the north of the site, which are identified in the VCA Study. These effects would not be widespread and would be limited to a few short sections of public footpaths and lanes to the north of the A31, where tranquillity is adversely affected by road traffic noise. On this basis it is considered that the Proposed Development conserves the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park and its setting when considered in its entirety.”* (page 35, Alton Advanced Energy





(between 2-3km South West of the site) and these reconfirm that 'local' views tend to be significant and adverse, and are all around the site (North, South, East and West). This brings the total of viewpoints with medium or large magnitude and adverse views to **nine**.

- 3.5) A range of views showing the emissions from the stacks were developed, and these demonstrate that emissions will be seen against the sky, and it is considered that these emissions will draw a viewer's eye to the proposed development and therefore increase perception of the proposed development and its adverse visual impact.
- 3.6) Nine wintertime viewpoints were undertaken. For the longer distance views there were no changes to the visibility of the proposed development, but the two close-range viewpoints: VP8 Hangars Way, East Worldham and VP13 St. Swithun's Way, near Bonhams Farm, demonstrated that the stacks will be more easily seen in winter, with VP13 near Bonhams Farm being an appreciable change. A further small but appreciable negative impact.
- 3.7) The additional information does much to confirm that most of the significant adverse impacts were identified during the first Landscape Visual Impact Assessment and reinforces where the most severe impacts are experienced. There is a disproportionately large number of key viewpoints on which the proposed development will have an adverse and significant impact, and five of those views are from within and on the edge of the National Park. Due to its size not only will the proposed development be seen from many viewpoints, but its scale makes it **very dominant** within those views, which is a significant detraction for the landscape, that is: the viewer's eye will always be drawn to the building to the detriment of viewing the wider valley landscape and enclosing valley sides. From many viewpoints the main proposed building, because of its scale, obscures the valley backdrop. In a landscape setting that has a significant and well-connected PRow network, this impact will be felt strongly by users of the PRow.
- 3.8) Information on the proposed impact of night-time lighting is described in the ES Volume 3 Appendix 4.2 Lighting Assessment and it appears that the proposed development is compliant with the Institute of Lighting Professionals, 2011 Guidance Notes for the Reduction of Obtrusive Light for National Park receptors. Specifically, the level of 'sky-glow' is compliant with the criterion as set out for ILP Environmental Zone E1, to protect 'dark night skies'. From the images shown in the Lighting Assessment it appears that all lighting is directed downwards from approximately the lower third of the building and illuminates hard standing areas. The ES Volume 5 10.1 page 17 states that *"lighting of the Proposed Development would be less intensive than for the existing MRF, due to the use of more modern and better designed lighting, infrared CCTV cameras and night-mode operation. As such there would be visual benefits at all viewpoints within the SDNP at night as, existing lighting levels at the site would be reduced as a result of the Proposed Development"*.
- 3.9) It would have been valuable for the comprehensiveness of the Landscape and Visual Impact assessment, if some night-time lighting visualisations had been carried out, as were carried out for the stack emissions plumes. The supporting documentation submitted 14 December, claims that there will be no night-time lighting of the stacks and that lighting will be kept to a minimum and this is considered acceptable in principle but note that over time site lighting could be subject to change, and further evidence of impact on the landscape would be required. It is also considered that night-time visualisations would be highly unlikely to alter the landscape objection, i.e. additional information on lighting would not result in a change of recommendation to that of approval.

#### 4) Comments on the Building Design in its Landscape Context

- 4.1) The application accepts that the scale of the building makes it difficult to conceal within this landscape and much work has been undertaken to attempt to integrate the proposed development into its surroundings, through the design of the main building structure. It is clear from the Design Evolution Documents 1 and 2, that great amount of consideration has been put towards visually reducing the impact of the building bulk (height, width, and length) by breaking up rooflines and adding texture and pattern to the facades so that they are varied, and by providing green walls on the facades that are predominantly below the skyline and white/grey for facades that will be viewed predominantly above the skyline. It is an interesting, innovative, and striking building. That the green walls could display seasonal changes in colour could also be useful in helping the building integrate with the landscape at different times of the year. The applicant demonstrates experience of managing green walls of this scale, through the example of Veolia Leeds RERF (literature provided with 14 December additional information), although the sustainability of high volumes of water for irrigation required during dry weather is questioned, and the exact specification for plant species for this site is still to be determined. An estimated 9360 litres of water per day in High Summer to irrigate the walls, is the equivalent of 21 times a four-person household consumption (when a typical four-person household consumption is 438 litres per day<sup>3</sup>).
- 4.2) To manage the bulk of the building, the design proposals have needed to borrow features of landscape character areas found in the adjacent landscape character area of the East Hampshire Hangers and landscapes further east in the South Downs, rather than the specific landscape valley character within which the site actually sits. White/grey cliffs, chalk escarpments and strongly undulating hills, are not features of this river valley landscape, and to that end the building does not sit within the landscape as though it 'belongs' here. It represents a different landscape and as such is an incongruous form of development. This landscape assessment considers that the main building (housing the boiler house, turbine hall and tipping hall) of the proposed development, at approximately 40m height by 165m length and 75m width, is too bulky and too visually dominant to be able to successfully integrate within this rural and low-lying river valley setting and therefore has an adverse effect on the surrounding landscape, both in terms of impact on landscape character and impact on views. The 80m stacks are also significant features that break the flow of this gentle valley landscape. The comments from our previous response still stand "*it is considered that these changes [since initial scoping] 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.*"

## 5) Comments on the Landscape Layout and Planting Design

- 5.1) The landscape proposals include retention of the existing tree cover around the perimeter of the site, planting of new native trees and hedges, new species-rich grassland, and new wet grassland and marginal planting within the proposed drainage pond. Existing tree cover within the site could not be replaced on a like for like basis, due to the reduced areas available. In addition, new planting would take time to provide the same level of screening as the trees removed. Due to the constrained nature of the site, the size of the building works, and the proximity to the railway line on the Eastern boundary, planting options are limited. The building and hard surfacing proposed have increased their footprint making it difficult to achieve much in the way of additional screen planting or planting to soften the impact of the building. Offsite mitigation planting, to reduce the impact of the development proposals from key views is not proposed. The applicant has no control of the future maintenance and management of the screen planting along the boundary of the A31, as it is

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<sup>3</sup> Southern Water, Water Usage Guide: <https://www.southernwater.co.uk/account/water-usage-guide>

within the ownership of others.

- 5.2) The landscape planting choices for the native structure planting are acceptable in principal but due to the countryside setting, we would recommend that native planting is used throughout, and therefore the proposals for ornamental low maintenance ground cover planting around the car park edges should be revised and substituted for a native woodland/hedgerow edge species planting mix.
- 5.3) As described in the previous response, should the Local Planning Authority be minded to approve the application, full details of the landscape proposals, with a twenty five-year management and establishment plan including management and maintenance of the green walls, should be made a condition of approval.
- 5.4) Additional information provided on 14 December 2020 on the proposed route of the Grid Connection (Figure 8) shows a simple and direct connection in verges alongside the A31 and PRoW to Mill Lane Sub-station. This for the most part appears to provide for minimum disturbance, although attention should be paid to avoid damage to the roots of trees and hedgerow species, and details of construction methods and tree root protection would be required as a condition of approval.

## 6) Summary Conclusions

- 6.1) It is considered that the submission of additional information on 14 December 2020, along with the original submission provides an essentially comprehensive, clear, and generally accurate picture of the landscape and visual impact of the proposed development. The only additional elements that may have been useful to aid comprehensiveness of the assessment would have been night-time lighting visualisations, although these are highly unlikely to have altered the objection recommendation.
- 6.2) It has been valuable to have the additional information, as this has clarified that for the most part the significant and adverse impacts had been identified as part of the earlier submission. Several further significant impacts have been identified, and it has reconfirmed the impact on the landscape character of the River Wey (within a radius of approximately 1-1.5km from the site) is significant and adverse, and the impact on a significant number of 'local' views within an approximate radius of 3.5km of the proposed development are predominantly significant and adverse. There are some impacts on the northern edge of the South Downs National Park, and whilst these are important, they are not the prime reason for recommending an objection.
- 6.3) In accordance with NPPF Rev 2018, Paragraph 127: Planning policies and decisions should ensure that developments: ***"....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);..."*** (NPPF Rev2018, Para 127). It is considered that the proposed development as currently described is not sufficiently sympathetic to the surrounding landscape setting of the HILCA 3f: River Wey and its valley sides and the proposed development is therefore contrary to Paragraph 127 of the NPPF Rev2018.
- 6.5) Policy 13 in the Hampshire Minerals and Waste Plan (Adopted 2013) requires the design of minerals and waste development to be of an appropriate scale and

character in relation to its setting. As described in the earlier landscape response of 18 September 2020, this site is visually exposed and can be viewed all around. It is considered that the proposed development on this site, in terms of its scale, massing and character as currently shown, causes an **unacceptable adverse visual impact** and **does not enhance the distinctive character of the Hampshire landscape within which it sits**, and is therefore considered to be contrary to Policy 13 of the Hampshire Minerals and Waste Local Plan and an objection to these development proposals is recommended on landscape grounds.

*“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.**” (Hampshire Minerals and Waste Plan, Adopted 2013)*