

From: Chawton Parish Council

Sent: 13 August 2020 07:54

To: Strategic Planning <planning@hants.gov.uk>

Subject: Planning Application Ref: 33619/007, Veolia Incinerator - Response

To: Planning Department, Hampshire County Council.

Planning Application Ref: 33619/007, Veolia Incinerator

Dear Sirs,

On behalf of **Chawton Parish Council** we wish to register our objection to this application due to its impact on our residents and all those who live in, work in, or visit, the area of the proposed site.

Specifically, we **OBJECT** on the following grounds:

1. **Increased traffic:** The incinerator proposed will serve the whole of the South of England not the local area. It has been calculated that this will mean 58,000 annual HGV movements by 70+ lorries a day, travelling large distances to bringing waste to the site and taking waste away. This will put an enormous strain on the already busy A31, causing delays and congestion to other road users, particularly in local villages and towns en route, and also on the more minor country roads as the lorries cross from the A31 to the A3 to reach the Portsmouth area. These roads are not suitable for traffic of this sort and other drivers, cyclists and riders will be put at risk.
2. **Air Pollution and climate change:** Incineration results in high levels of greenhouse gas emissions. For every tonne of waste burned, typically around one tonne of CO₂ is released into the atmosphere, this is more than if the waste were sent to landfill. This process does not align with the government's commitment to reduce carbon emissions. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that are invisible to the human eye but harm local air quality. Emissions include dioxins, NO_x and ultrafine particulate matter that can be harmful to both human health and the natural environment. It has been established that there is no safe level for particulate matter, which causes respiratory diseases and cancer and to which children are particularly susceptible. Evidence from UNICEF also shows that it effects their cognitive development. Research is ongoing in this area and it is currently felt by many that there is not enough monitoring, enforcement, or transparency to ensure incinerators are operating safely. We do not believe local residents' health and wellbeing should be risked in this way.
3. **Risk of ground water pollution:** The proposed site falls within the flood risk area of the River Wey and the plans include the digging of a 14m deep bunker into the Principal Aquifer. Consequently there is a risk of surface and groundwater pollution, which must be taken account of under **the locational criteria set out within the NPPW Appendix B - protection of water quality and resources and flood risk management** – "Considerations will include the proximity of vulnerable surface and groundwater or aquifers the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area."
4. **Incineration harms recycling and is a barrier to the circular economy:** Rather than incinerating waste, local authorities should focus on maximising re-use and recycling. However, when they are signed up to long-term waste contracts that involve incineration, their incentive or ability to invest in improvements to their recycling service is undermined. This is particularly pertinent in this case as the building of the incinerator will involve the loss of the current recycling facility.

5. **The application does not show consideration of alternative sites:** This facility is not designed to deal with local waste but will import waste from a much wider area including from the south coast. The situation of this facility is therefore completely inappropriate, being sited far away from the source of much of the waste. This site has only been put forward because the applicant already owns the land, other more suitable sites should have been considered and the application should have included these.
6. **The proposal falls into the bottom bracket of the 'waste hierarchy':** The application shows that the heat from this incinerator is not commercially viable to reuse locally. This means the proposal falls firmly into 'disposal' the bottom bracket of the 'waste hierarchy' which is the least desirable solution and should only be considered where none of the options above it are appropriate. As a recycling facility currently exists on the site, we cannot see how this test can be met.
7. **The incinerator would have a substantial adverse impact on the character of the area:** The proposed incinerator would comprise large structures and two 80m high stacks. Due to its scale, height and industrial character, the proposal would have a substantially significant landscape and visual impact, adversely affecting the countryside and small residential areas around it. It would be completely out of keeping with the rural character of the area and be damaging to it and nearby protected areas, sitting as it does 1 mile outside the boundary of the South Downs National Park and close to Alice Holt Forest and Bentley butterfly conservation area. It would be impossible to adequately screen a building of this size.
8. **The incinerator would damage the historic environment and built heritage:** The location of the proposed incinerator sits amongst ancient parishes, village conservation areas, listed buildings and areas which attract visitors and generate tourist income. These would all be damaged. For example, the village of Bentley is the start of the 'The Shipwrights Way' which is described as a long distance route for walkers, cyclists and horse riders linking villages and towns of East Hants through beautiful countryside. Views from this route would be dominated by the incinerator.

In summary it is our view that the proposal would conflict with the policy aims of Annex E of PPS10 in terms of visual intrusion, nature conservation, traffic and access, and air emissions (as they apply to traffic). We also do not believe the proposals meet any of the objectives set out in the Local Plan: Joint Core Strategy objectives, particularly those under 'Nature and the Built Environment' and 'Sustainable Development'.

Yours faithfully

Mandi Sowik
Clerk, Chawton Parish Council