



Mr Sam Dumbrell  
Hampshire County Council  
Castle Avenue  
Winchester  
Hampshire  
SO23 8UL

Direct Dial: 07392 879 658

Our ref: P01428574

10 June 2021

Dear Mr Dumbrell,

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ALTON MATERIALS RECOVERY FACILITY, A31, ALTON , GU34 4JD  
Application No. 33619/007**

Thank you for your letter of 17 May 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Bonham's Farmhouse is of high architectural and historic interest, part of which is derived from its rural setting. The proposed application for the development of an advanced energy recovery facility with a 40m tall principle building with 80m tall twin stacks would cause harm to the grade II\*listed farmhouse by eroding its historic rural setting. Historic England therefore has concerns regarding the application. In assessing the application your Council should be clear that the proposed facility is necessary and that current proposals represent the best (or least harmful) location for it keeping in mind the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraphs 193, 194 and 196 of the National Planning Policy Framework (NPPF).

**Historic England Advice**

Historic England's interest in this application relates to the impact that the proposed advanced energy recovery facility would have on the nearby grade II\* listed Bonham's Farmhouse.

The Significance of Bonham's Farmhouse

Bonham's Farmhouse is a handsome 17<sup>th</sup> century house. Although designed as a farmhouse, its design elevates the building to the scale and character of a small manor house, conveying the wealth and sophistication of its owner at the time of construction.



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The rural setting of the house makes an important contribution to its significance. The surrounding greenery acts as a backdrop to views of the building, enhancing its beauty, intentionally placing the house in a countryside setting giving it primacy within the landscape. The building's relationship with the surrounding rural landscape acts as a reminder of the function of the building as the centre of a farm complex. As many of the farm buildings once associated with the farmhouse have been demolished, the visual link with the land farmed from the house is particularly important.

### The current development proposals and their impact on the significance of designated heritage assets

The application is seeking planning permission for the construction and operation of an advanced energy recovery facility immediately south of the A31. This would comprise a power station for the recovery of energy generated from non-hazardous residual waste with a maximum building height of 40m and twin stacks of 80m.

This development would harm the significance of Bonham's Farmhouse through changes to its setting. The nature of this harm is illustrated in Fig. 5.6n of the Environmental Statement (Viewpoint 13) which is taken from north of Bonham's Farmhouse looking south. In this image, the twin stacks are particularly visible when looking towards the historic farm complex, with the main building to a lesser extent. This impact is shown to increase in winter, with the stacks and main building's presence becoming more easily discernible, eroding the historic rural setting associated with the farm to such an extent that at least a moderate level of harm is caused to the Farmhouse's significance.

### Legislative and national planning policy considerations

When determining this application your Council should be mindful of its statutory duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

The proposals need to be considered against the policies in the NPPF which apply to designated heritage assets, which includes listed buildings and conservation areas. Paragraph 193 of the NPPF, requires great weight to be given to conserving a heritage asset, whilst paragraph 194 requires clear and convincing justification for any harm to a designated heritage asset. These policies combined with the legal requirement cited above suggest a strong presumption against any harmful development in the proposed development location.

Additionally, the proposals should be weighed against the public benefits it offers as advised by paragraph 196 of the NPPF.



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## The Hampshire Mineral and Waste Plan and The East Hampshire Local Plan

In reviewing the Hampshire Mineral and Waste Plan, adopted in October 2013, and the East Hampshire Local Plan, adopted May 2014, we note there is no allocation for an advanced energy recovery facility in the location proposed.

Policy 7 of the Hampshire Mineral and Waste Plan advises that 'minerals and waste development should protect and, wherever possible, enhance Hampshire's historic environment and heritage assets, both designated and non-designated, including the settings of these sites.' It continues to advise 'minerals and waste development should preserve or enhance the character or appearance of historical assets unless it is demonstrated that the need for and benefits of the development decisively outweigh these interests.'

### Conclusion

We understand that a facility of the type proposed requires a certain building quantum and stacks to function. It is our understanding that there is no scope to alter the design to reduce or remove the harm we have identified by proposals. Consequently, locating such a facility in the location proposed will inevitably harm the significance of the grade II\* listed Bonham's Farmhouse. It is therefore for your Council to conclude whether the public benefits of such a plant outweigh the identified harm to this building as required by para 196 of the NPPF. We note Policy 7 of the Minerals and Waste plan requires these benefits to decisively outweigh the harm.

In weighing the public benefits your Council should be clear that the proposed facility is necessary and that this is the best (or least harmful) location for it, given the harm we have identified in the proposals. We do not identify any heritage benefits associated with the proposals to contribute to the weighing exercise.

The requirement of the 1990 Act to have special regard to the desirability of preserving a listed building and its setting and paragraph 193 of the NPPF to give great weight to the conservation of a designated heritage asset means that heritage issues raised by the proposal must be taken very seriously when your Council considers this application.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.



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Historic England

Yours sincerely,

**Louise Forsyth**

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