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Mr Zac Ellwood
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TOWN AND COUNTRY PLANNING ACT 1990 - PC/2021/0001

Proposal: Consultation from a neighbouring authority for development of an energy recovery facility and associated infrastructure.

Location: ALTON MATERIALS RECOVERY FACILITY A31 ALTON

Waverley Borough Council (The Council) raised a formal objection in principle to the proposed Energy Recovery Facility and Associated Infrastructure at Alton Materials Recovery Facility by letter dated 14 August 2020.

The Council still maintains its objection to the proposal following the submission of additional information in respect of Introduction and Background (primarily Waste Hierarchy and Need), Alternatives, Ecology and Nature Conservation, Air Quality, Historic Environment, Climate Change and Landscape and Visual Effects and other General Clarification.

Waverley Borough Council, like Hampshire County Council, declared a Climate Emergency in 2019. The Climate Emergency requires urgent action and the proposed development would be contrary to the Council's aim to achieve carbon emission neutrality by 2030.

The reasons for objection outlined in the Council's letter of 14 August 2020 remain, however, in response to the additional information submitted, additional areas of concern, including those which may result in negative impacts to the Council's communities and natural assets are set out below.

Location of development

The proposed development would be sited on the existing site used as Veolia's Materials Recovery Facility and Waste Transfer Station. A full appraisal should be undertaken to establish whether there are more appropriate sites for the proposed development that are also located in closer proximity to large heat consumers.

Existing use

The proposed development would result in the loss of the existing Alton Materials Recovery Facility. Plans to replace this facility to allow continued re-use and recycling should be prioritised over a proposed use further down the waste hierarchy.

Proposed use

Energy Recovery Facilities should be used in preference to land fill but not in preference to more sustainable options such as re-use and recycling. Whilst the proposed Energy Recovery Facility would potentially reduce landfill, other measures should first be prioritised to reduce the quantum of landfill generated, such as improved recycling and re-use rates which would result in less harm to the environment.

It is not clear where the waste to be processed at the facility will originate and whether this would be from outside the area, therefore redistributing harmful waste disposal impacts from other areas into the local area.

The proposed energy recovery capacity for Hampshire between 2011 and 2020 exceeded requirements set out in Policy 27 of the Hampshire Minerals and Waste Plan. As such, the proposed facility is not required to meet policy requirements.

Air Pollution and Emissions

The proposed development would result in significant environmental impacts, including an increase in air pollution, and would also contribute to global warming. Air pollution generated from burning in Alton would naturally spread to surrounding areas, including Waverley, and therefore increase exposure of the Borough's residents to air pollution.

Increased CO₂ emissions from the proposed process conflict with the Council's aim to reduce such emissions and achieve carbon neutrality by 2030.

Highways Impacts

The A31 runs from Waverley to Alton in East Hampshire and significant additional vehicular movements to and from the proposed development will impact on Waverley's residents as well as the borough's natural and environmental assets. There are already high levels of congestion in Farnham and surrounding areas in Waverley and an additional 20-40,000 additional vehicular movements will create further harm in this regard.

Increased vehicular movements to the proposed facility, potentially travelling through Farnham, are of particular concern to the Council given the existing Air Quality Management Area (AQMA) in Farnham which was set up due to exceedances of the annual mean air quality objective for nitrogen dioxide as a result of traffic congestion. Additional vehicular movements through the town will hamper efforts to manage this. Whilst further from Alton, there is an additional AQMA in Godalming which could be impacted.

Environmental Assets

Much of Waverley's countryside is covered by national and local designations including areas forming part of the Surrey Hills AONB and Area of Great Landscape Value. There are also a number of special protection areas designated for their important ecological habitats under European Legislation which could be negatively impacted from dispersed air pollution and subsequent impacts on air quality. The proposed development would have a detrimental impact on Waverley's important environmental and natural assets, contrary to national policies to conserve and protect these areas.

Conclusion

Waverley Borough Council maintains its strong and in principle objection to the proposed development. The additional information submitted in respect of the proposed scheme has not changed the Council's position in this regard.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Zac Ellwood', written in a cursive style.

Mr Zac Ellwood
Head of Planning & Economic Development