

Sam Dumbrell (Hants)

Our Ref:

SDNP/21/00032/ADJAUT

Contact Officer:

Richard Ferguson

Tel. No.:

01730 819268

15th February 2021

Dear Sir/Madam,

**Neighbouring Authority Consultation**

**Proposal:** Adjacent Authority Consultation - Development of an Energy Recovery Facility and Associated Infrastructure

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

Thank you for your correspondence received 17 December 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

Thank you for re-consulting the South Downs National Park Authority (SDNPA), following receipt of further information from the Applicant.

The SDNPA previously submitted a response to the current application on 14th August 2020 and this should be read in conjunction with this further response. Our further comments below maintain the SDNPA's concern about the visual impact of the scheme and object on this basis.

We recognise that the Applicant has made efforts to respond to our previous concerns about the lack of a full assessment of the impacts upon the setting of the National Park, within the evidence underpinning the scheme.

The further information submitted now recognises the need to consider National Park purposes, a statutory duty upon public bodies in decision making, and has attempted to assess the scheme in this context.

The SDNPA has assessed this information. Whilst we do not wholly support the conclusions that the Scheme's visual impact from public vantage points within the National Park isn't harmful, it is reasonably comprehensive. To this extent, it does address our previous specific concerns about the lack of assessment of views, which should be taken into consideration in the planning balance.

#### Main issues

1) The impact upon the setting of the National Park in regard to visual harm caused to outward views across the Wey Valley towards the site.

The photographic evidence submitted, along with photomontages, demonstrate that widespread views of the scheme from within the National Park would be limited. In this regard, there is unlikely to be a widespread significant visual impact upon the National Park's setting.

However, visual harm would occur in a number of specific and sensitive views from within the National Park where the site and the surrounding landscape of the National Park and Wey Valley can be appreciated, such as in viewpoint 6 near Wyck in the submitted evidence. In such views, the scheme would be seen as a large incongruous feature within a landscape which visually contributes to the setting of the National Park. Indeed, the submitted photomontages emphasise this impact. It is the apparent visual impact in these particular views, where the scheme would be most visible from, that the SDNPA wishes to raise concern.

The proposed green wall on the building is a positive design feature. It is, however, unlikely to satisfactorily mitigate the visual harm given the scale and form of the building. In addition to the 80m high chimney, which would break the skyline in certain views, viewers' eyes would be drawn to the building to the detriment of the wider landscape character and setting of the National Park.

2) Impact from external lighting upon dark night skies.

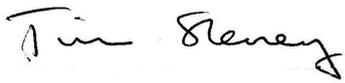
Please see the SDNPA's previous comments. The effect upon perceptual qualities such as tranquillity and dark night skies are important special qualities of the National Park to conserve and enhance. The illumination of the site is still likely to cause harm to the setting of the National Park in these regards.

#### Suggested conditions

If Planning Permission is granted, we recommend that conditions address the following design details in order to reduce impacts upon the National Park.

1. Species used in the green wall should be similar to surrounding landscape vegetation in colour/tone.
2. Colour/finish of materials of the building and chimney stack should seek to minimise its visual prominence.
3. The lighting scheme should take into account the International Dark Skies Reserve status of the National Park. It should be proportionate to the operational requirements of the site and not introduce an excessive amount of illumination. All lighting should be designed to minimise upward light spill.

Yours faithfully

A handwritten signature in black ink that reads "Tim Slaney". The signature is written in a cursive style with a large initial 'T' and a long, sweeping underline.

**TIM SLANEY**

Director of Planning  
South Downs National Park Authority

**Contact Officer**

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