SITE	Land to the west of the Raymond Brown Waste Solutions, A303 Enviropark, Drayton Road, Barton Stacey, Andover, SO21 3QS
PROPOSAL	A Waste to Energy Facility comprising a twin line facility (i.e. two boiler and flue gas treatment lines) capable of processing a total of up to 500,000 tonnes of waste per annum (tpa), with a gross electrical generating capacity of up to 65 MW. The facility would generate hot gases that in turn are used to produce steam for use in a steam turbine to generate electricity.
CASE OFFICER	Mrs Samantha Owen

1.0 **Introduction**

This report is presented to NAPC at the request of the Head of Planning and Building.

1.1 This report seeks confirmation of this Council's response to the public consultation carried out by Wheelabrator who are seeking consent to construct a Waste to Energy (WtE) Incinerator at the A303 Enviropark. This process is administered by the Planning Inspectorate as a Nationally Significant Infrastructure Project and therefore the Council's response to this consultation will be taken into account as part of this process.

1.2 This scheme requires consultation with a wide array of consultees. Paragraph 2.17 details those consultee responses which are awaited from Hampshire County Council. At the time of writing these have not been received and therefore it is anticipated that a number of these will be included in the Update Paper prior to the NAPC meeting.

2.0 **Nationally Significant Infrastructure Projects (NSIP)**

NSIP applications are major infrastructure projects such as new harbours, roads, power generating stations (including offshore wind farms) and electricity transmission lines, which require 'development consent' under procedures governed by the Planning Act 2008. Development consent, where granted, is made in the form of a Development Consent Order (DCO). The Planning Act 2008 sets out thresholds above which certain types of major infrastructure projects are considered to be nationally significant and require development consent.

2.1 On 1 April 2012, under the Localism Act 2011 the Planning Inspectorate (PINS) became the government agency responsible for operating the planning process for NSIPs. The Waste to Energy (WtE) Harewood Incinerator is considered an NSIP as the electrical generating capacity of the facility would exceed a threshold of 50 megawatts.

2.2 <u>The role of the Local Authority in the NSIP Process</u>

The Local Authority is a statutory consultee and whilst participation on the process is not obligatory it is strongly advised by PINS guidance. The Local Authority has the ability to provide an important local perspective of the proposed scheme at the pre-application stage. This Council is also likely to have a role in monitoring and enforcing many of the DCO provisions and requirements if consent is ultimately granted by the Secretary of State.

2.3 **Proposal**

The proposed development would comprise of a WtE facility and associated buildings, structures and plant, including:

- a tipping hall;
- fuel storage bunker;
- boiler house;
- ash collection area (bottom ash bunker);
- up to two flue stacks including emissions monitoring;
- flue gas treatment building;
- turbine hall housing a steam turbine and generator;
- above ground fuel oil storage tanks for use at start up and as an auxiliary fuel;
- administrative offices;
- air cooled condenser;
- grid connection substations and mains transformer;
- fire water tanks;
- demineralised water treatment plant; and
- supporting infrastructure comprising weighbridges and gatehouses, storage tanks, raw water tanks, emergency diesel generators and vehicle access roads including ramp to tipping hall.

The building would be comprised of two separate buildings; the main boiler house would be 163 metres wide and 54 metres deep, and the turbine and transformer building which would be 150 metres wide and 30 metres deep. The maximum height of these elements would be 46 metres. In addition to this Two chimney stacks are proposed at a height of 80 metres.

2.4 The design of the Incinerator has not been finalised and is part of this public consultation process. Access to the site would be from the existing access to the A303 Enviropark. If granted consent the construction period would be 42 months long and the WtE Incinerator is initially proposed to have a life of 50 years.

2.5 **NSIP Process**

There are six stages to the NSIP process which are:

- Pre-application
- Acceptance
- Pre-examination
- Examination
- Recommendation and Decision
- Post Decision

2.6 Pre-application

At this stage the prospective applicant promotes and develops their proposals. There is a requirement to consult widely and it is this stage at which the Council is considering its response to within this report.

2.7 Acceptance

Here the applicant submits an application for development consent to PINS. PINS have 28 days to decide whether the application meets the standards required to be accepted to examination. The applicants are anticipating the submission of their application in the first quarter of 2020.

2.8 Pre-examination

Once the application has been accepted members of the public can register as an Interested Party by making a relevant representation.

2.9 Examination

This part of the process is where the submissions, evidence and public representations are considered by PINS. Up to 6 months is allowed to carry out the examination of all important and relevant matters.

2.10 Recommendation and Decision

PINS must prepare a report on the application to the relevant Secretary of State within 3 months. The Secretary of State then has a further 3 months to make the decision.

2.11 Post Decision

Following the decision made by the Secretary of State there is a six week period in which the decision may be challenged in the High Court if there are grounds to do so.

2.12 **Proposal**

The development proposal for a WtE Incinerator is currently at the pre-application process stage. The Statement of Community Consultation (SoCC) attached at Appendix A details how the developer will carry out their statutory consultation duty with the local community and statutory consultees. The process is currently at the Stage 2 Statutory consultation stage which runs from the 1st November 2019 to 12th December 2019. Due to the timescales proposed by the Applicant the current consultation period has occurred close to the proposed submission, (March 2020) it would be expected therefore that a lot of the environmental impacts of the project would have been assessed and available for comment.

The Statement of Community Consultation (SoCC) sets out what information would be available during this consultation period they are;

- The feedback received at Stage 1 and any changes made to the Project.
- The design and appearance of the WtE facility.
- The environmental effects of the Project (detailed within the PEIR) and any mitigation that is required
- The timescales and next steps for the Project.

2.13 The following information has been submitted as part of the public consultation process:

- 3D design visuals
- Site location plan
- DCO site boundary
- Illustrative site layout
- Preliminary Environmental Information Report (PEIR)

2.14 The project is classed as an Environmental Impact Assessment development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The applicants, as part of the pre-application process, have submitted a PEIR. The PEIR is defined in the EIA Regulations as information which has been compiled by the applicant and is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development. Whilst there is no prescribed format a good PEIR should allow consultees, whether they are specialists or not, to understand the likely environmental effects of the proposed development and informs consultation responses during the Pre-application stage.

2.15 **Considerations**

At this pre-application stage this Council is a Statutory consultee in the process as such the Council can respond to the information submitted by the applicants. The following issues are considered below:

- Principle of Waste to Energy
- Air Quality
- Noise and Vibration
- Ground Contamination
- Heritage
- Landscape and Visual Impact Assessment
- Economic Development
- Connection to the Grid
- Design
- Alternative Sites
- Water Demand
- Amenity – Overshadowing
- Combined Heat and Power (CHP)

2.16 Hampshire County Council (HCC) are currently considering the following areas which will, once received, be reported to the Committee via the Update Paper:

- Highways
- Ecology
- Water
- Archaeology
- Landscape
- Climate Change
- Socio Economic
- Health

3.0 **POLICY**

3.1 Government Guidance - National Policy Statements (NPS)

NPSs are produced by government and set out the government's objectives for the development of nationally significant infrastructure. National Policy Statements undergo a democratic process of public consultation and parliamentary scrutiny before being designated (i.e. published). They provide the framework within which PINS make their recommendations to the Secretary of State. The relevant NPSs are:

- Overarching National Policy Statement for Energy (EN-1)
- National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.2 Hampshire, Portsmouth, Southampton, New Forest National Park and South Downs National Park – Minerals and Waste Plan

- Policy 5 – Protection of the countryside
- Policy 7 – Conserving the historic environment and heritage assets
- Policy 8 – Protection of soils
- Policy 9 – Restoration of minerals and waste developments
- Policy 10 – Protecting public health, safety and amenity
- Policy 12 – Managing traffic
- Policy 13 – High-quality design of minerals and waste development
- Policy 14 - Community benefits
- Policy 25 – Sustainable waste management
- Policy 28 – Energy recovery development
- Policy 29 – Locations and sites for waste management

3.3 Test Valley Borough Revised Local Plan (2016)(RLP)

- SD1 – Presumption in favour of Sustainable Development
- COM2 – Settlement Hierarchy
- COM15 – Infrastructure
- E1 – High, Quality Development in the Borough
- E2 – Protect, Conserve and Enhance the Landscape Character of the Borough
- E7 – Water Management
- E8 – Pollution
- E9 – Heritage
- LE18 - Tourism
- LHW4 – Amenity
- T1 – Managing Movement

4.0 REPRESENTATIONS

4.1 Section 47 of the Planning Act 2008 sets out the applicant's duty to consult with the local community on the proposed application. How the applicant is going to consult is set out in the SoCC (Appendix A) which has been previously submitted and commented upon by TVBC. Notwithstanding the requirements for interested parties to submit any representations to the applicant, any representations received will be passed directly to the applicant as they have a duty at this stage to consider any comments submitted.

4.2 At the time of writing the report three representations have been submitted from unknown addresses and they have raised the concerns set out in the following paragraph.

4.3 The scheme has been objected to on the following grounds:

- Concern about particulate effects on soldiers using nearby training grounds;
- Air quality expert for Wheelabrator did not think there would be any effect over 800m, training areas fall within this 800 metres;
- Was advised site had not yet been modelled for air quality;
- Found response of Wheelabrator insulting;
- Concern about impact of Incinerator from A303;
- Why is this not being considered in an urban area, site is quite small meaning there is little space for all that is needed;
- Connection to the grid is some distance away;
- Impact on the roads of an additional 200 lorries will be tremendous;
- Concern about impact on mental health of people and health in general
- Impact on tourism;
- Impact on house prices;
- Huge structure will be visible to those living in local area;
- Impact on safety of cyclists utilising local roads;
- Burning waste runs counter to society to reduce, reuse and recycle;
- Cannot see how connection to the grid will be underground, it is more likely to consist of pylons;
- Where is excess heat going?; and
- Incinerating waste would lead release particulates and toxins polluting local habitats, farmland and people.

5.0 CONSULTATIONS

The following are summarised responses from the Council's internal consultees**.**

5.1 Environmental Protection

The primary sources of noise during operation appear to be deliveries by road vehicles and noise emissions (surprisingly noisy) from each of the two chimney stacks.

Whereas delivery noise will be intermittent and at ground level, so as to be capable of being screened by barriers and intervening hills etc., noise from the stacks will presumably be continuous 24 hours per day and, due to their height, cannot possibly be controlled through noise barriers or screening. Therefore, it is vital that engineering controls are applied at source to control such noise.

It is important that the list of receptors chosen is sufficiently comprehensive to represent all clusters of properties and individual properties. It is not clear whether sound level measurements for the other receptors will be undertaken or derived by some other means. I would expect sufficient background sound level measurements to be made in representative locations likely to be affected by noise.

There are two types of receptor in this case, firstly those affected by site-generated noise and secondly those affected by increased road traffic noise associated with the facility operations – these may be remote from the site. Much of the methodology provided in relation to noise by the applicant is flawed and cannot be relied upon.

5.2 Tranquillity

Consideration ought to be given by the Council as to whether any sites or footpaths in the vicinity of this site ought to be especially protected not just for amenity reasons but also because the tranquillity of those areas is particularly prized. The assessment does not consider the preservation of tranquillity at all.

5.3 Air Quality

The document is a statement of intent, it lays down the legislative and guidance framework under which it will make its assessment when the monitoring data is in. We are unable to comment further at this point until we have seen the data. We would need a full assessment of all receptors to be included in the final study.

5.4 Contaminated Land

This report is preliminary, rather than the desk study documentation that we are seeking. We would not accept this as a desk study report for example as there is not information to allow a suitable characterisation of the site. We understand that there has been some site investigation undertaken. There is no rational suppled for sampling which has been undertaken to date. We would need to see the laboratory results as well as the bore hole logs etc., so that we can assess that the conceptual model is robust when that is presented to us. We will also need to know who has authored this section of their report and their competence to do so. We will then need to see the remediation and validation information as will the Environment Agency.

5.5 **Design and Conservation**

Methodology:

It is not clear which guidance document has informed the approach taken, and whether the Historic England suite of guidance has been taken into account, particularly: Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets

Approach to GII listed buildings

Conservation areas should also be afforded more significance than non-designated assets. This approach is not considered to accord with national guidance.

Grade II listed buildings are still of special interest, and are of national importance. This needs to be taken properly into account when assessing impact of development on setting. It is not felt to be appropriate to categorise Grade II listed buildings with non-designated assets. This does not allow for sufficient weight to be afforded to the significance of these listed buildings, and there is risk of their being undervalued in the appraisal process.

5.6 Approach to Conservation Areas:

Again, it would appear to be appropriate to afford them greater weight than 'medium' significance.

In terms of the valuation of the individual conservation areas, the authors of the document have determined some conservation areas are more significant than others. This seems only to be based on how many highly-graded assets they contain within them. It would be unusual to rank conservation areas, and broadly they are considered to have equivalent status. It should be born in mind it is possible for a conservation area to contain no listed buildings at all. Reference should be made to the Conservation Area appraisal documents.

Inconsistency of approach

The conservation areas at Chilbolton and Wherwell are not referred to at all – the listed buildings contained within these villages are referred to as the 'Wherwell Group' and the 'Chilbolton Group'. This is confusing, also, as farmsteads (such as those at Firgo Farm) are referred to also as 'groups'.

In terms of the assessments of the settings of the buildings, the approach is not consistent.

Some of the buildings located in villages (such as Barton Stacey and Longparish) only have their setting assessed as part of the village – which is not appropriate, as each building has its own setting. Other buildings, though, such as those in Wherwell and Chilbolton are individually assessed. Only those buildings which are set in the open countryside have been considered fully.

There are no assessments of the settings of the conservation areas.

5.7 Value of setting

Some buildings may owe more of their special interest to their setting than others, and some may have more intimate settings, mostly confined to the village in which they are located, where others have wider landscape settings. However, the heritage appraisal would need to show that this has been addressed on a case-by-case basis, in order to understand what impact any change might have on a site's setting might have on its significance.
It may be in some cases that the settings of sites have been eroded by existing modern development. However, it cannot simply be assumed that because the setting has been compromised, it no longer makes a contribution. The cumulative impact of the proposed and existing development needs to be taken into account (in accordance with the Historic England guidance).

The contribution which a particular view makes to the appreciation of a site's special interest also needs to be properly taken into account. The development may only intrude into a view to/from a site in a particular direction, and not all views, however, if that view is important to understanding the site, the impact could be quite substantial.
The conclusions of the impact of the development on the site's setting are questioned. In almost all cases the conclusion is the impact would be 'low' or less. However, in some instances it is anticipated not just the chimneys, but also the building will be visible. This would represent quite a significant change, especially given the massive industrial building and chimneys would be a very alien feature in most parts of this rural area.

Further viewpoints should be considered. The need for further viewpoints may become necessary in light of additional information. It is acknowledged that further work may demonstrate that there may be negligible, or no, views of the proposed development from some of the above sites, but sufficient evidence should be provided that this is the case. In these instances, wireframes may be acceptable.

5.8 **Landscape**

The Landscape and Visual Impact Assessment Chapter 14 of the PEIR explains that the proposed development would result in moderate to major adverse effects; the development would provide no beneficial landscape or visual effects to the immediate or wider landscape. Therefore it is considered that the proposals fail Paragraphs 127, 130 and 170 of the NPPF and Policies E1 and E2 of the Test Valley Local Plan. Much of the supporting information requires further work and consideration.

A comprehensive range of viewpoints surrounding the site have been selected, which will highlight the impacts upon the local and wider landscape. Within the full application photo montages and wire frame models will be required to demonstrate the impact these proposals will have. Although this will inform the impacts, due to the size and scale of the development and the tight constraints of the site, it is unlikely to inform where further mitigation measures could be achieved.

Due to the sheer size and scale of the development there is no mitigation available, the site will rely entirely on screening measures outside of the red line boundary to mitigate the site. The substantial impact of the development will dominate the local and wider landscape from Year 1; even after Year 15, it will still have major and moderate landscape and visual impacts. Whilst some mitigation suggestions have been proposed, these would do little to integrate the development within its setting.

A significant part of the soft landscaping surrounding the site is comprised of Ash (Fraxinus); it is expected that Ash Die Back (Hymenoscyphus fraxineus) will wipe out 90% of Ash trees over the next 5 -10 years. This will potentially impact upon the surrounding landscape and open up views towards the site.

5.9 **Economic Development**

Tourism is an important and growing sector of the Test Valley economy. It attracts 2.9m day trips p.a. (2017), represents £195m worth of expenditure and supports more than 4,500 jobs.

The A303 represents the main artery for visitors from London and the south east heading west into Test Valley. The siting of a massive industrial structure so close to and within clear view of that road would be alien and likely to have a detrimental impact of the character of the area and to potential visitors.

The 3 year period of construction, although offering a demand for accommodation from construction workers, will emphasise the disturbance that the development would bring.

Furthermore, Test Valley's unique attraction is its river: The River Test and its tributaries are world-renowned and the home of dry fly trout fishing. The quality of the water and the landscape in which it sits within are incomparable. Any potential threat to that unique quality could have a significant impact on both the perception of Test Valley to visitors and to the local recreational fishing industry and the businesses which it supports.

6.0 **RESPONSE**

6.1 The response will refer to the following:

- Policy
- Air Quality
- Noise and Vibration
- Ground Contamination
- Heritage
- Landscape and Visual Impact Assessment
- Socio-Economic Issues
- Other Issues

6.2 **Policy**

NPS – EN1 is the overarching NPS for Energy and it sets out the Governments policy for delivery of major energy infrastructure and how it seeks to cut greenhouse gas emissions by at least 80% by 2050 when compared to 1990 levels. Moving to a secure, low carbon energy system is challenging but achievable, requiring major investment in new technologies.

6.3 NPS – EN3 deals with renewable energy infrastructure which includes on and offshore wind farms and energy from biomass and waste. The recovery of energy from the combustion of waste will play an increasingly important role in meeting the UK's energy demands. The WtE Harewood Incinerator proposes to utilise fuel that would otherwise be sent to landfill and would come from municipal or commercial waste. WtE facilities are supported in principle within NPS – EN3 in terms of their role in meeting future energy demand.

6.4 Assessment of how the development does or does not accord with local policies will happen at a later stage when an application has been submitted and accepted and will be addressed in the Local Impact Report which is a document produced by the Local Authority assessing the positive, neutral and negative impacts of the proposal.

6.5 **Air Quality**

The issue of Air Quality is twofold, there is the issue of both construction and operating traffic impacts on the surrounding air quality and secondly what is being emitted from the facility itself. Air Quality would need to be addressed in terms of its impact on local residents, businesses and the general air quality within the area and beyond.

Chapter 7 of the PEIR deals with the issue of Air Quality. It has become clear that little information has been submitted to assess at this stage. Monitoring of air quality has not yet been carried out to be able to base any assessment on.

To assess Air Quality on those aspects mentioned above data is monitored at what are known as receptor sites. Receptor sites are those sites that are sensitive to the impact of what is being monitored. Chapter 7 of the PEIR addresses the issue of proposed receptors, however it is noted that this does not include local businesses. The Receptors that have been identified are residential properties and ecological sites. There is also MOD land within the area which is used for training by the Armed forces and it does not appear that a receptor is being considered on these sites either.

6.6 It is considered that there is insufficient information submitted at this stage to be able to effectively assess the impact of the proposed facility on air quality on local residents or businesses. There is also concern that local businesses and landowners like the MOD are not receptor sites. It is concluded that with regard to Air Quality the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development

6.7 **Noise and Vibration**

A facility of the size proposed has the capacity to create noise and vibration which would impact on local residents, businesses and the quiet enjoyment of the countryside. Noise and vibration would emanate from both construction and operation of the facility and from traffic movements to and from the site.

It is considered that the list of receptors needs to be revisited; there is concern that some businesses and residential properties have been missed. Receptors need to be carefully considered and should reflect the different noise environments that surround the site as well as businesses and dwellings.

To properly assess the noise impacts of the proposed development the current noise levels surrounding the site need to be known. This baseline monitoring is ongoing and has included long term monitoring for one week and weekend. The long term monitoring however has only been carried out at the nearest receptor to the site and whilst it is not clear if other monitoring is occurring, utilising one receptor for baseline monitoring is not considered sufficient. Monitoring should also be carried out in suitable weather conditions.

The primary source of noise during the construction phase is the piling operations and should be assessed using BS5228 but again the assessment of this standard is inconsistent with that guidance. The PEIR document does not consider the preservation of tranquillity at all.

6.8 It is considered that with regard to noise and vibration the information supplied is deficient. Assessing the impact of the facility on noise and vibration is not possible when the assessments utilised are not comprehensive enough and the interpretation of any assessment is not carried out to a recognised industry standard. It is considered that the PEIR is premature as it does not adequately address the issues and the assessments that have been carried out fall short of what needs to be done to be able to understand the impacts of the proposed development.

6.9 **Ground Contamination**

Ground contamination is considered in terms of on site contamination of soils and groundwater and is an important issue as the site is above an aquifer and developing the site could disturb any existing contaminants and also create contamination.

The information submitted on contamination is at present not in a format that is acceptable, it is noted that some sampling has been undertaken but no rationale of this sampling has been provided. The ground contamination report is not sufficient to be able to conclude on this issue.

6.10 **Heritage**

Heritage needs to be considered in terms of its impact on the settings of both designated and non designated heritage assets. Designated assets include listed buildings, conservation areas and registered parks and gardens. Non-designated assets could be buildings, monuments, sites, places or areas of landscape that have been identified as having a degree of heritage significance which would need to be considered when making planning decisions.

6.11 The methodology used in assessing the impact of the proposal on heritage assets has been inconsistent and flawed. It fails to adequately take into account the setting of these assets and as such represents an unacceptable threat to the historic resources of this part of the Borough.

6.12 **Landscape and Visual Impact Assessment**

Due to the size and design of the proposed facility there is no ability to adequately mitigate the harmful impact the proposed development would have on the landscape. The LVIA is there to help consultees and the public understand where it would be visible from and how it would be viewed from these viewpoints. A thorough LVIA will help inform people's reaction to the impact of the facility within the wider landscape. This is currently inadequate and significantly more work is required in order to fully assess the impact of the proposal on the surrounding landscape.

6.13 **Economic Development**

The proposed facility would have both short and long term impacts on the local economy, as it would create jobs during both construction and operation and whilst this is a potential positive of the proposal, consideration needs to be given to how the facility would impact on another important sector of the local economy – tourism**.**

It is considered that a facility of the size proposed and its potential to be viewed from a wide area would have a negative impact on the perception of the Test Valley as a tourism destination.

7.0 **Other Issues**

7.1 Connection to the grid

The proposed scheme does not incorporate a connection to the grid. Guidance contained within the National Policy Statement EN-1advises that any application to PINS should include how the generating station connects to the grid and whether there are any particular environmental issues likely to arise from that connection. NPS EN-3 accepts that connection to the grid is for the applicant who would need to liaise with the National Grid to secure.

It is advised within the PEIR that connection to the grid will be applied for separately by the Distribution Network Operator (DNO). Due to its location connection to the grid could have significant environmental impacts and this should be considered in conjunction with the scheme. It would appear to not accord with Government guidance on generating stations and grid connection contained within the relevant NPS.

7.2 Design

The public consultation has also revealed the future design of the proposed facility. These are presented as 3D visuals and whilst both are the same design they do show different materials finishes. Within the information provided by the applicant they have also provided a photo of how the Incinerator might look from the road to the south leaving Barton Stacey.

The PEIR sets out the layout parameters for the proposed development in Figure 4.1. The layout parameters are shown as a series of elevational drawings. It is worth noting this parameter drawings show a different design than the 3D visuals. In figure 4.1 the Incinerator is shown as a box like structure with little or no design detailing. It is not clear as to why the

parameter drawings are not reflective of the 3D design as if this is the proposed design going forward a parameter drawing for this design should be possible. This ambiguity on design makes it difficult to provide comment as it is not entirely clear whether the 3D visuals can be relied upon or whether the information within the PEIR is more accurate.

7.3 Alternative Sites

In the PEIR Non-Technical summary in paragraph 5.2 it states;

"There is no policy requirement for the Applicant to consider alternative sites or justify its selection for the site of the proposed development."

This is not correct, the proposed development is an EIA development. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that for an application granting development consent for EIA development must be accompanied by an Environmental Statement which should include;

(d) a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment

It is therefore considered that information on alternative sites should be part of the ES and the alternatives to the proposed location should have been shared at this stage through the PEIR.

7.4 Water Demand

Issues concerning water resources and flood risk are the responsibility of organisations such the Lead Local Flood Authority (HCC) and the Environment Agency. Notwithstanding this there are areas of concern that should be highlighted at this stage.

During construction the proposed development would at its peak employ up to 1000 people with an average of 800 people, it is assumed that each worker will require 16 litres of water a day (this is based on Construction Industry Research and Information Association CIRA) which equates to 16 cubic metres a day.

During commissioning there would be a initial consumption of 6000 cubic metres to fill 2 x fire water tanks and an approximate ongoing requirement for 15 cubic metre per hour for plan usage. There will be some reuse of water and rainwater harvesting.

In total the proposed development is predicted to generate a demand of 135,000 cubic metres per annum for boiler feedwater, potable water and fire water which equates to 370 cubic metres per day.

Southern Water supplies water to this area with 100% of water coming from groundwater sources and the site falls within the Winchester Water Resource Zone (WRZ) in the western area of Southern Waters region. The Environment Agency has identified all Southern Water's region as an area of serious water stress. Southern Water produced a draft Water Resource Management Plan (dWRMP) in 2019 which sets out supply and demand for the next 50 years. This is recognised in Chapter 11 which acknowledges that without further resource or demand control measures the Southern Water Western area is forecast to have a supply demand deficit throughout the dWRMP period in a 1-200 year drought event. The Western Region however is under particular stress following the Environment Agency's proposed changes to abstraction licences (sustainability reductions) and that temporary use bans and to apply and implement measures secured through Drought Orders until new sources of water have been developed.

It is also noted in paragraph 11.72 of Chapter 11 that the most intensive use of water will be for the mixing of concrete, but it is likely that this will be done off site and delivered and will therefore not affect water supply to the site. Whilst this is noted there is a high probability that concrete brought onto site will have been mixed utilising water within this water stress region.

The developer's contention that the impact on water resources and flood risk during construction, operation and decommissioning would not be significant does not appear to be justified by supporting evidence. It would appear that the proposal would rely on significant amounts of water both during construction and during the operational phase which would place further pressure on this limited natural resource.

7.5 Amenity – Overshadowing

There are no dwellings within the immediate vicinity of the site and as such it is not considered that the proposed Incinerator would give rise to unacceptable overshadowing of any residential properties. To the north of the site is an established solar farm and this will be impacted by the proposed facility. Chapter 17 has assessed the impact of the proposed facility and it has been assessed that the proposed development including stacks would reduce energy production at the solar farm by 0.55%. To offset this loss wall or roof mounted panels are proposed on the Incinerator itself at present it cannot be assessed whether this would be sufficient to offset this loss.

The existing Raymond Brown operation is to the east and this would be overshadowed to some degree by the facility, however this is an employment site and is as stated in Chapter 17 less sensitive to overshadowing.

7.6 Combined Heat and Power

Combined Heat and Power (CHP) is the generation of usable heat and electricity in a single process. CHP is technically feasible for all types of thermal generating stations including energy from waste. The facility will be CHP ready although at present no commercially viable demand has been identified. If the neighbouring employment site has no use of this heat then it is not clear that there is anywhere else in the vicinity that could make use of this heat. Para 4.6.6 of National Policy Statement EN-1 states;

"Under guidelines issued by DECC (then DTI) in 2006, any application to develop a thermal generating station under Section 36 of the Electricity Act 1989 must either include CHP or contain evidence that the possibilities for CHP have been fully explored to inform the ….consideration of the application. This should be through an audit trail of dialogue between the applicant and prospective customers. The same principle applies to any thermal power station which is the subject of an application for development consent under the Planning Act 2008."

NPS EN -1 also required new thermal generating stations to consider the opportunities form CHP from the very earliest point and should be adopted as a criterion when considering locations for a project.

In light of the Government's aim to de-carbonise the energy network by 2050 the failure to take advantage of this potential energy source appears somewhat short sighted and further opportunities for this should be explored by the developer.

8.0 CONCLUSION AND RECOMMENDATION

That the Northern Area Planning Committee (NAPC) OBJECTS to this submission on the basis of inadequate information which has been submitted for Public Consultation including that contained within the PEIR. It is strongly recommended that further consultation with the public should occur. The NAPC endorses this report together with the full responses of consultees as Test Valley Borough Council's response to the Public Consultation process.
The following consultee comments should be noted in particular:

- **Air Quality - the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development.**
- **It is considered that with regard to Noise and Vibration the information supplied within the PEIR is deficient.**
- **Ground Contamination - the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development.**
- **In relation to Socio-Economic issues the PEIR does not address adequately the impacts of the incinerator on tourism which is influenced by a number of factors and whilst this is acknowledged it is considered that more work is needed on the impact of tourism in the local area.**
- **With regard to Landscape and Visual Impact Assessment the PEIR is currently inadequate and significantly more work is required in order to fully assess the impact of the proposal on the surrounding landscape.**

- **Alternatives to the proposed location should have been shared at this stage through the PEIR and in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.**
- **The proposed development would reduce energy production at the solar farm by 0.55% and it is not clear if the proposed mitigation would address this shortfall.**
- **It is advised within the PEIR that connection to the grid will be applied for separately by the Distribution Network Operator (DNO). Due to its location connection to the grid could have significant environmental impacts and this should be considered in conjunction with the scheme. It would appear to not accord with Government guidance on generating stations and grid connection contained within the relevant National Policy Statement**
- **Water Demand - the PEIR's contention that the impact on water resources and flood risk during construction, operation and decommissioning would not be significant does not appear to be justified by supporting evidence. It would appear that the proposal would rely on significant amounts of water both during construction and during the operational phase which would place further pressure on this limited natural resource.**
- **New thermal generating stations are required to consider the opportunities form Combined Heat and Power (CHP) from the very earliest point and should be adopted as a criterion when considering locations for a project. With no end user for the heat generated the failure to take advantage of this potential energy source appears somewhat short sighted and does not help to justify this location and further opportunities for utilising this should be explored by the developer.**

The full responses of the Council's consultees and any public representations be forward to the applicant for their consideration

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