

11.12 2019

## Consultation response to Wheelabrator PEIR reports

### 1. Introduction

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.

In the opinion of CPRE Hampshire, the PEIR is inadequate and does not provide sufficient information such that an informed view can be reached as to the likely significant effects of the proposed development.

The areas that we have identified as being inadequate are discussed below in the order in which they appear in the PEIR.

But firstly, we would draw the Inspectors attention to the lack of information made available in the PEIR regarding alternative sites. CPREH requested information about alternative sites (40) which were apparently considered. However, PEIR NTS 5.2, says “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; an indication of the main reasons for the option chosen has to be in the Environmental Statement (IPR 2017/d) and therefore should be shared in the PEIR.

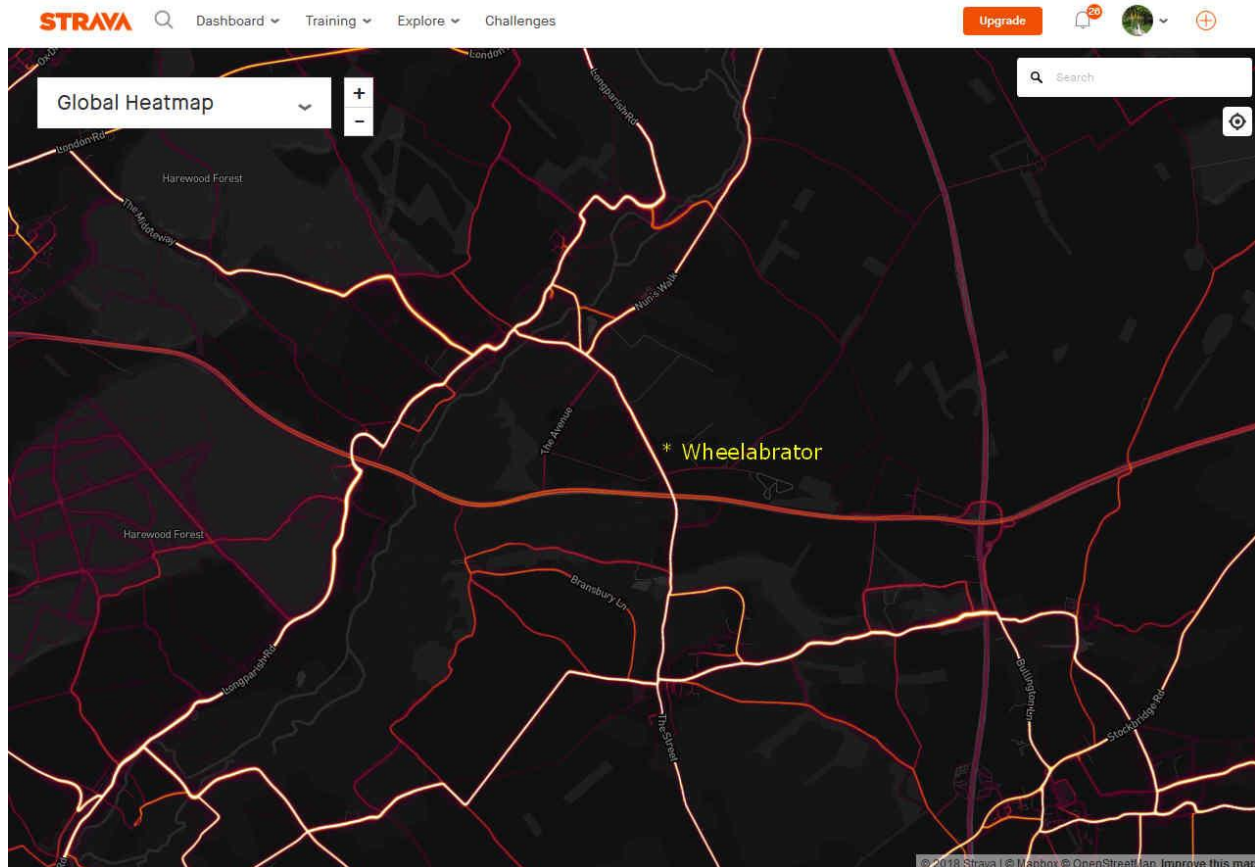
We make this point first, because CPRE passionately believe that this proposed very large industrial facility is the wrong development at the wrong scale in the wrong place, with no significant benefits, but all the many disbenefits and harms falling onto the local community and its valued, pristine environment.

### 2. Traffic and Transport (Chapter 6)

2.1 Table 6-27 of the traffic analysis shows that roughly one HGV will be either entering or leaving the Wheelabrator site every two minutes and in our opinion the implications of this for safety and delays on the A303 have not been properly assessed. The angle that the slip roads make with the A303 is such that HGVs accessing or leaving the A303 will have to do so at quite a low speed. This has the potential, particularly at busy times, to cause following A303 traffic to slow abruptly and/or change lane and this is a safety and delay risk that has not been assessed.

2.2 Paragraph 6.77, in the section on non-motorised traffic, state that ‘there are no National Cycle Routes near the site or any dedicated cycle paths. Local roads are rural in nature and are narrow with no street lighting.’ The implication is that there is negligible cycle traffic past the site.

Strava 'heat map' showing recorded cycle trips. The white hot routes are the most heavily used.



However, the premise that there is little cycle traffic is incorrect. The popular GPS-based cycling app Strava (<https://www.strava.com/heatmap>) has on-line 'heat maps' showing the routes of actual recorded cycle rides and the heat map for this area (see above) shows that The Street is indeed a popular cycle route – for the reason that it provides one of the few sparsely-spread opportunities for cyclists to cross the A303.

The principal safety risk to cyclists is probably from HGVs exiting the Wheelabrator site and turning left before turning left again to get onto the westbound A303; left-turning HGVs are well-known to be a principal cause of cycling fatalities in the UK. However, neither this nor any other risks appear to have been evaluated and the section on Accidents and Road Safety (paras. 6.144, 6.145, 6.146) make no reference at all to accidents involving cyclists. Paragraph 6.148 also concludes that 'amenity and ambience for non-motorised users is likely to worsen but with limited users per day (low sensitivity) the overall effect is likely to be minor adverse at worst, which results in a temporary negligible effect; this is not considered significant'. Paragraph 6.155 uses similar words in coming to the same conclusion with respect to fear and intimidation of non-motorised road users. We doubt if the many cyclists that use the road past the site would agree with either conclusion, especially with the implied lack of intimidation in sharing The Street with HGVs.

2.3 Para. 16.22 (on recreation and tourism) states that the assessments of traffic and transport, noise and vibration, air quality, and visual are not complete as construction and operational traffic data is not yet available. This is tantamount to admitting that the analysis in Chapter 6 is inadequate.

### 3. Water Resources and Flood Risk (Chapter 11)

The proposed site of this incinerator is atop a principal groundwater aquifer which not only provides most of the area's domestic water supplies, but also crucially, the water which feeds the local iconic chalk streams and rivers of the Upper Test Valley.

#### 3.1 Significance

This sole and irreplaceable public water source is highly valued, as are the local pristine chalk streams and rivers which attract and provide international class fly fishing and quiet recreation – with all the attendant socio economic benefits which that brings to the area. Chalk streams are globally rare, protected ecosystems. All of this would be placed in jeopardy if there was to be even the possibility of an escape of waste pollutants from the proposed incinerator site.

#### 3.2 Contamination

Although the current proposal is to 'seal' some parts of the site with 'damp-proof membranes' and a concrete apron on other parts, this will not be sufficient to guarantee no leakage of waste contaminants into the ground over the proposed decades of plant operation. We regard this as totally inadequate to protect a principal water supply aquifer supplying base flow to these iconic rivers.

Groundwater has been assumed at 6.3 m BGL ( PEIR Vol2 p31 7.3/9). Excavation to -4m (plus excavation for sealing the site) will bring construction very close to groundwater levels thereby exacerbating the risk of leakage especially during the construction phase.

Furthermore, and worrying, is that this site also lies on top of a buried chalk valley, infilled with higher permeability Head gravels. This dissects the site from NE to SW, with another branch from N-S directly under the proposed buildings, and within it flows an ephemeral Winterbourne. This would form a direct pollution pathway to the Dever Springs and trout fish-farm some 800m downgradient. Although mentioned ( PEIR 12.42 p12) insufficient actions have been proposed to investigate, monitor or mitigate it.

The current drainage plan (PEIR Vol-2, S4), suggests SUDS permeable paving to subsurface cellular storage, and then infiltration soakaways. This is unlikely to be allowed by the EA as the site is atop the Principal Chalk aquifer and so whilst not being within any **Source** protection zones it is within a **Groundwater** protection zone, within which no major developments are normally allowed (presumption against) without the tightest possible controls on infiltration prevention.

Therefore, we view these drainage proposals as inappropriate and in need of review.

A final related issue involves sinkholes and the potential for subsidence. These are common hazards in these ground formations (Head over Chalk), and the buried valleys beneath the site give cause for concern over the potential for differential settlement, with time. This could cause subsequent cracks in any ground protection layer which would then give rise to leakage of contaminating fluids into the ground, which will then pass down the buried valleys to the sensitive receptor of the Dever Springs and trout farm, within months. We therefore find the site development proposals inadequate and inappropriate in this increasingly sensitive groundwater environment.

#### 3.3 Water use

There is considerable concern that there is no clear data with regards to water use or the water budget for this site.

1) Stress = moderate - (PEIR NTS7.10.2). We contest this. This does not accord with Southern Water's (SW) modelling for its western area which shows an increasing demand-deficit in this area of 'severe water stress'. A drought permit was issued for the Test in September this year as river flows fell below the hands-off level.

2) Rainfall increase - Any stated increase in rainfall (no data source given, again not supported by SW research) will be less effective and may not recharge diminished aquifers.

3) Total use figures - Given 1 and 2, the stated amount of 135,000m<sup>3</sup>/a to be taken from the domestic supply will reduce the limited available supplies so its impact is not “negligible” (PEIR NTS 11.87 P19; Also (11.85 P19) this use will increase during construction. Crucially, unlike domestic supplies, it is not returned to the Test catchment system via the usual wastewater pathways.

4) There is no clarity about the amounts needed for different uses, degree of contamination nor destination of used waters. Consultants at the events said both that the turbine was a “closed system” and a “system which would need topping up”.

**3.4 Waste water:** There is considerable confusion about waste water generation and destination. “No water leaves site” (event panels) v waste water drainage mentioned left to SW; (NTS 7.6.2). The direction of any effluent is unknown. An event consultant also said a WWTW would be built on the (crowded) site. Permeable paving, subterranean cellular storage and soakaways are all mentioned in the PEIR report (Vol2 App-D site plan).

We find the information supplied to date about water use, drainage and contamination inadequate, flawed, confusing and inconsistent with the local realities - so it is impossible to respond effectively at this stage.

#### **4 Landscape and Visual Impact Assessment (Chapter 14)**

In the absence of photo montages or wire frame models, or flying a balloon, it is not possible for CPRE Hampshire to assess the impact of the proposed development on views either within or beyond 5 kilometres from the Site. We request that a balloon is flown from the site at a height of 80 metres to allow an objective assessment of impact on landscape, visual amenity, remoteness and tranquillity, especially in longer distance views.

In particular, and based on our experience, we do not agree that the impact on views beyond 5 kilometres would not be significant. We consider that a building of the proposed size and height, with two stacks 80 metres high, would be clearly visible from viewpoints up to 15 kilometres, in which it would have a moderate adverse impact on landscape, visual amenity, remoteness and tranquillity (in its widest sense). Due to the large size of the proposed plant, with some two thirds of the building and the stacks above the treed horizon, it will not be possible to mitigate this impact to any appreciable extent either by planting, or external colour.

As to views within 5 kilometres, we agree with the PEIR that these are bound to be major or moderate adverse, depending on the viewpoint. The impact will be greater in winter, but winter photography has yet to be completed. We cannot therefore assess whether the impact on viewpoints stated to be moderate adverse would in fact be major adverse in winter.

Neither within or beyond 5 kilometres is there any assessment in the PEIR of the impact on remoteness and tranquillity (in its widest sense).

In the absence of a proper description and modelling of the plume, it is not possible to assess the additional impact on landscape and views, notably those from longer distance. While it may be correct that the plume is only expected to be visible intermittently, the worst case scenario requires photo montages to include the expected plume. These are not provided in the PEIR.

Specifically, as to tranquillity in terms of noise, there is no identification of areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason, contrary to NPPF para 180 (b).

Without a proper description in the PEIR of lighting needed on the building and stacks, including for aviation safety, it is not possible to assess the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation as needed to comply with NPPF para 180(c).

The PEIR sets out several types of visual receptors, but fails to include receptors at their workplaces, those using local roads and those visiting communal buildings.

Additional viewpoints need to be assessed as follows;

- From the westbound slip onto the A303 from Barton Stacey, where the height of roadside vegetation on the north side of the A303 is comparatively low.
- The view across garden and estate parkland from Middleton House, identified as an important view in the Conservation Area Appraisal. While not open to the public, the Estate Office is a place of work for some 12 employees and daily visited by contractors. Public, community, educational and conservation events take place in the grounds. It is therefore widely viewed by members of the public.
- Views from the local road leading southwest from Larkwhistle Farm in places not obscured by roadside vegetation

Further and crucially, NPPF para 170(a) requires that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing valued landscapes.

In *Stroud District Council v Gladman Developments* the Court of Appeal recognised the concept of a "valued landscape" as something different from a Designated Landscape such as the North Wessex Downs AONB and the South Downs National Park. Following that decision, it is now established in appeal decisions that landscapes that have demonstrable attributes that raise them above the ordinary may constitute "valued landscapes".

In assessing whether a landscape has such demonstrable attributes, use has been made by Inspectors on appeal of the Landscape Institute Guidelines for Landscape and Visual Impact Assessment (GVLIA), as well as prior appeal decisions and their own judgment and reasons.

It is accepted by the Court and Inspectors on appeal that identification as a "valued landscape" indicates development should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused.

It is acknowledged in the PEIR that the proposed development would cause significant adverse environmental effects in terms of landscape and visual amenity within 5 kilometres, with some classified as major adverse effects. Yet, critically, the landscape surrounding the Site has not been assessed within the PEIR to establish whether it is within a tract of countryside which is "valued landscape".

From our own knowledge and observation, and applying the principles established in GVLIA and appeal cases, we consider that there is a tract of countryside extending from 3 to 5 kilometres around the Site which has demonstrable attributes which raises it above the ordinary in terms of landscape character, physical distinctiveness, public experience, remoteness and tranquillity. This tract of countryside is therefore "valued landscape" on which the proposed building, 46 metres high with 80 metre stacks would, where visible, be bound to have significant adverse effects, and within which development should be restricted.

This tract of countryside includes:

- The Valley of the River Test, including the settlements of Longparish, Middleton, Forton and Wherewell
- The downland leading northwards from the Test Valley towards the North Wessex Downs AONB and eastwards from west of the Middleway to the boundary of the parish of Longparish
- The downland to the north of the A303 and extending from the Site towards the A34, including the high point with long distance views on Firgo Lane

The Dever Valley extending eastwards from the Test Valley to Lower Bullington

- Land to south of the Dever Valley, including the Barton Stacey Conservation Area and high points with long distance views on Barton Drive, the road from Barton Stacey to Newton Stacey and the public right of way from Barton Stacey to Bransbury

## 5. Climate Change (Chapter 15)

The data as presented is questionable and misleading; for instance, Table 3 shows that a very considerable quantity (434,000 tonnes/a) of CO<sub>2</sub> will be emitted from this facility, with around 40% being non-biogenic CO<sub>2</sub> from fossil carbon sources. The remaining 60% is excluded from the overall carbon balance, due to it being modern, biogenic carbon. However, this is still to be emitted daily from the stack, at a total rate of some 1200 tonnes CO<sub>2</sub> from 1400 tonnes waste burned daily. If this waste were landfilled, then the biogenic (60%) waste would release its CO<sub>2</sub> & CH<sub>4</sub> very slowly, over some 10-40 years of bio-decay, and the non-biogenic carbon (40%) would remain in the ground for centuries. This time delay is very important to factor-in given the current urgency to tackle climate change now – and not in future decades. This hidden fact alters Wheelabrator's carbon-balance calculation considerably.

The analysis in this table further attempts to demonstrate that the fossil CO<sub>2</sub> is more than offset by avoided emissions due to recovered metals, less use of gas-powered electricity generation and less landfill. However, this can be disputed because :

- a) The assertion that the only alternative (to this plant) is gas-fired power generation is unconvincing. This plant is essentially a base-load generator and what it will be displacing may be one of a number of power sources, including renewables and power from one of the UK's interconnectors which have a combined capacity of 4GW (the largest link being with France, where the majority of electricity comes from carbon-free nuclear power). Evidence on which power source will be displaced is required from National Grid to permit Wheelabrator's current analysis to be valid.
- b) The presumption that all the incinerated waste would otherwise go to landfill, and thus add to methane emissions, is also questionable. An alternative possibility is that the waste could have been better separated. Hampshire achieves a rate of recycling (41.7%) that is well below (see <https://www.letsrecycle.com/councils/league-tables>) the best local authority in England which achieves 64.5%. So, there is clearly local potential for better waste separation, re-use and conversion to power without incineration – and this would be the better solution from a climate change perspective given the questionable offsets suggested by Wheelabrator.

## 6. Inadequacies of the Socio-economic case (Chapter 16)

By proposing this large industrial scale development in the small-scale detailed landscape of the Test Valley, the applicant is deliberately ignoring or is completely unaware of the reality of its socio-economic characteristics. These are only crudely reflected in the socio-economic analysis PEIR Vol 1 Chap 16. Crucially, the number of consultants approached after the Scoping phase (Table 16.2 p4) is ridiculously small and totally unrepresentative of the broad sweep of social and economic activities in the area.

### 6.1 Natural Capital underpinning socio-economic issues.

The proposal is sited at 64m AOD on an interfluvium between the Test and the Dever, close to the ancient oak forest of Harewood. The two river valleys between which the proposal is sited, support agriculture, recreation and tourism and create the landscape which draws people to live and work here and for quiet enjoyment of the countryside. The natural capital of the area and the high quality of the rivers and countryside is a significant economic and social resource. There is no understanding anywhere in the PEIR of the adverse impact that the scale and construction of this intrusive plant, with lorries every few minutes for 50 years, will have on local socio-economic structures in the wider area. Damage to the environment's natural capital will cause significant socio-economic damage in this sensitive area which will be caused both by the presence of the proposed plant as well as its "residual effects impacts".

### 6.2 Planning Policy (Chap 16 p5)

Test Valley Local plan p113 (relevant but not quoted.)

**Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough** To ensure the protection, conservation and enhancement of the landscape of the Borough, development will be permitted provided that:

- a) it does not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located.

HCC's Strategic Plan for 2017-2021 ('Serving Hampshire'). is quoted (Chap 16 p5) Outcome 3: 'People in Hampshire enjoy a rich and diverse environment' will be achieved by conserving and using natural resources efficiently, improving Hampshire's environment and quality of life, and enabling people to access and enjoy Hampshire's countryside" The proposal, sited where it is, cannot be in line with this.

We find that local planning policies protecting natural capital are quoted selectively and/or ignored.

### 6.3 The importance of the Chalk streams to the socio-economic environment

The iconic chalk streams are of international importance (86% of global chalk streams are in the UK), visited from all around the world for quiet recreation. Despite quoting selectively from the Test Valley Local Plan 2011-2016 (TVLP) Chap 16 p5-6) this section is ignored.

(TVLP p26 2.46) The River and its tributaries are the defining landscape feature of the Borough and is important for its ecological habitat as well as being an important economic resource. The fishing industry generates significant income for the local economy. Understanding the processes currently at work and addressing the problems arising is a key issue for the future.

The important contribution of the rivers to the social economic environment has not been understood.

### 6.4 Agriculture and forestry

The contribution of agriculture and forestry (barely referenced in PEIR Chap 16) is dependent on healthy soils and clean air. Many jobs both direct and indirect flow from this. Despite the regulatory environment it is not appropriate to site this plant where food is grown and /or raised. No assessment of cumulative long term impacts of depositions into local soils and waters have been made. (chap7 Air Quality 7.169)

This should have been part of the consultation.

## **6.5 House prices**

People move to the area because it is beautiful, has high natural capital, there is work locally and London is in reach. Damage to the natural capital will affect house prices in Longparish and Barton Stacey. No cosmetic measures around the structure are going to mitigate this.

This should have been part of the consultation.

## **6.6 Tourism and recreation**

16.76 Chap 16 acknowledges that tourism is growing in Test Valley Borough but makes inappropriate comparisons with high status visitor destination areas and only overnight stays are considered. There are many daytime facets to tourism in the Test and Dever valleys supported by the natural capital e.g. rambling, equitation, cycling, fishing and woodland experiences, so the figures do not represent the reality at all. Moreover, inconsistent figures for income from tourism to the Borough are quoted viz; (2017) £27 million (16.77); £194.8 million, (16.78).

16.116 We dispute that no tourism receptors in the wider area will be affected during the construction phase. The attraction of the area will be diminished, the impression of the area as a tourism destination will be altered with possible deleterious effect on the economy. This will continue during operation. There is no adequate analysis of this ( Cf Tourism 16.132 p25) and we do not accept the visual assessments provided. See separate section.

The character and importance of Tourism has not been evaluated or understood.

Impacts during the operation phase are not analysed. This is needed for effective consultation phase 2 responses. An inadequate, confusing and incomplete picture is given.

## **6.7 Assessment assumptions and limitations section 16.22 p 6/7**

“A full assessment of impacts on recreational and tourism receptors (e.g. traffic and transport, noise and vibration, air quality, and visual) will be provided in the ES”.

We find this unacceptable. It's too narrow and a realistic assessment of the impacts on the broader sweep of local socio-economic activities was needed for the public consultation phase 2 coupled with the analysis of the broader long-term threat to natural capital in the Test and Dever Valleys.

We consider the PEIR findings are restricted in scope, confusing, incomplete and so inadequate.

## **Conclusion**

CPRE Hampshire reiterates its statement that the PEIR is inadequate and does not provide sufficient information such that an informed view can be reached as to the likely deleterious effects of the proposed development on our much valued local environment.

Submitted to Wheelabrator Consultation using [info@wtiharewood.co.uk](mailto:info@wtiharewood.co.uk)

Cc Hampshire County Council Planning Department  
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