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Hampshire

Hampshire County Council Planning
Case Officer: Sam Dumbrell

10 February 2021

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Dear Sir,

HCC 33619/007 - Development of an Energy Recovery Facility and Associated Infrastructure at Alton Materials Recovery Facility, A31, Alton, GU34 4JD

This submission of CPRE Hampshire is in response to the further information provided by the Applicant in response to Hampshire County Council's requests for further information set out in its of 11 December 2020 to the Applicant. It supplements CPRE Hampshire's letter of objection to this application dated 12 August 2020 (**the CPREH Objection**), and needs to be read together with it.

Principle of a new ERF Plant in Hampshire

The Clarification Letter from Axis (dated 14th December 2020, reference: 2627-01/AR) refers in its section on Socio-Economic Benefits to some misunderstanding by CPRE on points related to the need for the ERF at Alton. However, the response given by Axis in its letter, and by the Applicant in ES Volume 5 Additional Environmental Information (dated 14th December 2020) sections 2.0 and 3.0, both fail to answer our original concerns, and have themselves failed to understand the issue we raised. East Hampshire currently ranks 175th out of 222 Waste Collection Authorities, recycling only 34.34% of waste. Neighbouring WCAs in Hampshire, namely Winchester (164th, 36%), Havant (197th, 31%) and Basingstoke (207th, 28%) are not much better or are considerably worse. So, our concern relates to one aspect of Hampshire County Council's Minerals and Waste Plan (2013), Policy 28a such that Energy recovery development should be used to divert waste from landfill and where other waste treatment options further up the waste hierarchy have been discounted. We are concerned that permitting the ERF at Alton will impact upon the necessity and ambition to progress recycling further up the hierarchy and will not incentivise any improvement on the dire statistics given above. Surely the point must be to reduce the residual waste higher up the system, and only incinerate it as a very last resort.

The Axis Clarification Letter also states that CPRE have misunderstood the impact of the HCC decision not to fund the MRF at Chickenhall Lane, Eastleigh. The Letter states that Veolia, as part of Project Integra, are currently developing alternative plans for a MRF at the Chickenhall Lane site. But just "developing plans" is only the very start of the process, which itself will be subject to planning and many other factors, so until this site is funded, built and up and running, our concerns remain. In fact, the Axis Letter explains that the gasification facility at Charlton Lane, Shepperton, Surrey, is still under



The countryside charity
Hampshire

construction having started in 2015, and is still undergoing commissioning. This just confirms that the Chickenhall Lane MRF cannot be seen as available alternative facility to the Alton MRF Plant, at least for several years. In fact, the letter only serves to increase our concern when it refers to 750,000 tonnes of waste (that was capable of being treated at an ERF) going to landfill from waste planning authorities that neighbour Hampshire. This regional waste is likely to be the proposed feedstock for the ERF, and seems to support the proposition that the proposed ERF has an economic justification rather than an environmental one.

Accordingly, CPRE Hampshire considers that the focus of waste policy in Hampshire needs to be on improved recycling of waste, which will require retention of the existing MRF Plant at Alton for the foreseeable future, rendering the Environmental Statement for the Proposed Development well out of date before it could become operational.

Landscape and Visual Amenity

Impacts on Valued Landscape

In the CPREH Objection, and after physical assessment of the landscape to the north of the proposed development (the Site) as described in Appendix A to that Response (**Appendix A**), CPRE Hampshire concluded that:

Taking account of:

- *the attractive and distinctive landscape with a fine long distance view over the Wey Valley to the South Downs National Park and to the west over Alton*
- *the high quality chalk landscape in the upper part of the valley, and overall sense of tranquillity*
- *the high quality public experience of this landscape from public and permissive rights of way and the St Swithun's Way long distance path*
- *the important contribution of this tract of landscape to the characteristics identified in LCA 3f - Wey Valley in HILCA and LCA 4b - Northern Wey Valley in EHLCA*

CPRE Hampshire considers that the tract of land running northwards from the A31 in the vicinity of the Site has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies and requires to be protected. (an NPPF Landscape)

In its letter Hampshire County Council asked the Applicant for its views on the above conclusion, specifically referring to the landscape assessment by CPRE Hampshire in Appendix A.

In response to the Applicants submissions in section 3.1 (Landscape Character Assessments and Values) and section 3.3 (Valued Landscape) of the Clarification Report CPRE Hampshire's comments are set out below.



The countryside charity
Hampshire

Crucially, the Applicant makes no criticism of the CPRE Hampshire's description in Appendix A of the tract of land assessed (**the CPRE Area**)

So, while not easy to discern from the submissions, we set out below in italics what we understand the Applicant to be submitting, followed by CPRE Hampshire's responses:

(1) That the landscape immediately to the north of the Site is diminished by the presence of pylons, the existing MRF and loss of tranquillity associated with traffic on the A31, and so is not an NPPF Valued Landscape.

CPRE Hampshire agrees that the area immediately to the north of the Site and in proximity to the A31 is not an NPPF Valued Landscape or part of one and, by way of clarification, is not intended to be included within the CPRE Area.

(2) EHDC Landscape Character Assessment Local Landscape Area (LLA) 4b.i: Northern Wey Valley is assigned a medium value in the EHDC Landscape Capacity Study Table 3 and this assignment is independent of the fact that the study as a whole is based on the relative capacity for a specific type of change, namely housing development.

CPRE Hampshire agrees that LLA 4b.i: Northern Wey Valley has been assigned a medium value in the Capacity Study. This is to reflect its quality of regional importance, per Table 3.

(3) Not being subject to any local landscape designation, and assigned a medium value as part of LLA4b.1: Northern Wey Valley, the CPRE Area is similar to many areas of the upper slopes of the Wey Valley in proximity to the A31 corridor, which are anyway greatly impacted by loss of tranquillity from the A31. Accordingly the CPRE Area is not an NPPF Valued Landscape.

CPRE Hampshire does not agree. Being quality of regional importance it is to be expected that areas, indeed large areas, within LLA4b.i: Northern Wey Valley will have demonstrable attributes which raises them above the ordinary so as to be NPPF Valued Landscapes. The impact of the A31 diminishes quickly moving up the valley sides, due to both the reduction in discernible road noise and the arising of views over the A31 corridor to the South Downs National Park (SDNP). Indeed, EHDC has accepted that Northbrook Park further along the Wey Valley towards Farnham is an NPPF Valued Landscape, following a study of that area by landscape consultant Terra Firma in the context of it being suggested as a site for large housing development. So, to the extent that any part of the CPRE Area falls within LLA 4b.i: Northern Wey Valley but demonstrates the required attributes it can be an NPPF Valued Landscape or part of one. In any event only a small part of the CPRE Area, to the south of St Swithun's Way falls within LLA4b.1, otherwise it falls within LLA3d.4: as discussed below.



The countryside charity
Hampshire

(4) LLA3d.4: Froyle and Bentley Downland Mosaic is assigned a medium to high value in the Capacity Study but covers more elevated land to the north of the County Landscape Character Area CCA3f: Wey Valley and is related more to CCA6a: East Hampshire Wooded Downland which is an extensive area that wraps around the north and west of Alton and extends into the SDNP south of the A31. CCA6a is located largely outside the DSM ZTV for the Proposed Development and there would only be infrequent visual impacts from publicly accessible locations in this CCA. This would not be sufficient to alter the overall character of the area.

CPRE Hampshire's response is as follows;

(a) CPRE Hampshire agrees that LLA3d.4; Froyle and Bentley Downland Mosaic has been assigned a medium/high value in the Capacity Study, per Table 3, due to its national significance resulting from its strong visual connection with the nationally designated SDNP to the south. This corroborates the fact that moving up the valley side from the Site the landscape becomes increasingly sensitive as the SDNP becomes more visible. It accords entirely with increasing tranquillity and landscape quality found on moving away from the MRF plant and A31 into the area which the Applicant now acknowledges to be within the landscape and visual setting of the SDNP, having views over the A31, MRF plant and River Wey to the SDNP, all as described in Appendix A.

(b) As appears from Appendix A the CPRE Area extends from the proximity of the A31 north of the Site, over the St Swithun's Way, some 0.7km from the Site, up the valley side to below Brockham Hill Barn then eastwards across Holybourne Down, and up the valley side from Upper Froyle towards Stowell Cottage. Accordingly, other than the small part within LLA4b.1 referred to above, whole of the CPRE Area falls within LLA3d.4: Froyle and Bentley Downland Mosaic and assigned a medium/high value in the Capacity Study, entirely consistent with being an NPPF Valued Landscape.

(c) As stated in paragraph 1.3 of the description of the Wey Valley County Character Area in the Hampshire Integrated Landscape Character Assessment, CCA3f: Wey Valley has similar boundaries to the LLA4b.i: Northern Wey Valley "*although the edges of the area are defined further up the valley side slopes reflecting the valley landscape unit*". These boundaries are shown in the included map from which it is clear that CPRE Area falls almost entirely within CCA3f: Wey Valley. CCA6a: East Hampshire Wooded Downland Plateau is not therefore of material relevance. So far as any of the most northern points of the CPRE Area may jut into CCA6a it is the case that tracts of land which are NPPF Valued Landscapes may well fall into two or more Landscape Character Areas depending on their size and location.

(d) References to the DSM ZTV and visual impacts of the Proposed Development are not relevant to assessing whether the CPRE Area is an NPPF Valued Landscape, which depends on the current quality of the landscape and public experience of it. Impacts of the Proposed Development are a separate matter.



The countryside charity
Hampshire

(5) Paragraph 3.1.11 in the Clarification Report is not understood as it appears from our study of the map relating to CCA13b: East Hampshire Hangers that it is covered by the SDNP and so is outside the scope of the Landscape Capacity Study.

Accordingly, having carefully reviewed the Response of the Applicant as set out in its Clarification Report dated December 2020, CPRE Hampshire continues to maintain that the tract of land described in Appendix A to CPRE Hampshire's original Response is an NPPF Valued Landscape.

As a tract of land which is an NPPF Valued Landscape, assigned a medium/high value in the EHDC Landscape Capacity Study, and within the landscape and visual setting of the SDNP, it is clearly of High Sensitivity as stated in the CPREH Objection.

As regards impacts of the Proposed Development on this landscape area, we disagree with the conclusions of the Applicant that there are few publicly accessible locations from which views of the Proposed Development would be possible. As appears from the CPREH Objection and the additional information provided by the Applicant, the Proposed Development would be visible clearly from at least the following publicly accessible locations:

- The upper reaches of Brockham Hill Lane
- Holybourne Down in winter
- A total of some 1.3 km of the St Swithun's Way from New Lane through to West End Farm
- The facilities at West End Farm
- Footpath running to the north of West End Farm (Froyle 27)
- Locations on the western edge of Upper Foyle
- Stowcroft Lane towards Stowell Cottage

Further, it is now acknowledged by the Applicant that there would be additional visibility in winter in locations where in summer there is some mitigation from intervening woodland.

In the higher reaches the impact would be exacerbated by the intervention of this huge building and stacks into views over the River Wey to the SDNP.

The impact of the boiler house and/or stacks of the Proposed Development on all these publicly accessible locations spread over this NPPF Valued Landscape of High Sensitivity would be significant, and major or major-moderate adverse.

Impacts on the South Downs National Park and its setting

It is clear from the additional information that the impacts on view from the SDNP would be greater than stated in the Environmental Statement, notably from:

- footpaths between Binsted and River Hill Farm
- "one or two" locations between River Hill Farm and Stubbs Farm
- the footpath above South Hay House



The countryside charity
Hampshire

- one section of footpath between East Worldham and West Worldham
- top of the Zig-Zag path at Selborne
- short sections of the Writers Way and other footpaths between Northfield Hill and Upper Farringdon

So, it is now clear that the Proposed Development would be visible from a number of publicly accessible viewpoints across this part of the SDNP. While the impact on some would be limited on others it would be significant, and CPRE Hampshire considers that overall this amounts to a substantial visual impact on the SDNP.

There is no defined boundary to the setting of the SDNP. The EHDC Landscape Capacity Study states at paragraph 58 that *any development or change capable of affecting the significance of the SDNP or people's experience of it can be considered as falling within its setting*. The extent to which it does so is will depend on its scale, height and siting.

It is now acknowledged by the Applicant that the valley sides to the north of the Site are within the landscape and visual setting of the SDNP. The impacts that the Proposed Development would have on this area is set out above under Impacts on Valued Landscape.

It is not clear to CPRE Hampshire whether the Applicant acknowledges the area between the Site and the boundary of the SDNP to be within the setting of the SDNP. It falls partly within LLA 4b.2 Northern Wey Valley and partly within LLA6c.1 Worldham Greensand Terrace, which are both assigned a medium value in the EHDC Landscape Capacity Study in recognition of regional importance. Landscape of this value adjoining the SDNP must, we consider, enhance the experience of users of the SDNP looking over it from the SDNP or passing over it to and from the SDNP, and substantial change to that landscape character would adversely affect that experience. Consequently, we consider it to be within the setting of the SDNP, and note that this is acknowledged in the Landscape Capacity Study for both these LLAs.

It is apparent from the Environmental Statement and the additional information that there are within this area numerous viewpoints and lengths of PROW to the west of Binsted, and leading to Wyck and Neatham, where receptors would experience significant adverse visual effects. Also at Neatham Down.

Indeed, as would be expected of a building of this scale and height elevated on the other side of the River Wey, it would effectively dominate this area of fine countryside.

Accordingly, CPRE Hampshire considers that the Proposed Development would have significant adverse impacts on the SDNP and its setting and would not further national park purposes.



The countryside charity
Hampshire

Design

We note the additional information provided by the Applicant on the proposed Green Walls, which is interesting, but we have serious doubts as to how far satisfactory maintenance could be guaranteed throughout the lifetime of the ERF Plant; or how well maintenance would be able to respond to periods of drought, storms or other extreme weather conditions which we are led to expect due to climate change. We also note that, unlike at the Leeds ERF, one wall would point to the north, and no evidence has been provided to show it would be effective or sustainable. Providing appropriate plants year round would present a particular challenge. Yet the north facing wall would be critical, sitting between the higher ground within the Valued Landscape to the north of the Proposed Development and the SDNP to the south.

Even if these matters could be dealt with satisfactorily, it remains our view that the Green Walls themselves are very large structures alien to the landscape which will do little to mitigate the landscape and visual impact of the boiler house and nothing to mitigate the landscape and visual impact of the twin stacks. We note that the wall at the Leeds ERF is designed only to improve the general appearance of the plant in what is an industrial area and provides no wider landscape function.

Conclusions as to Landscape and Visual Impact

Having carefully reviewed the Response of the Applicant as set out its Response to Regulation 25 Letter dated 11 December 2020 CPRE Hampshire:

- **Continues to maintain that the tract of land described in Appendix A to CPRE Hampshire's original Response is an NPPF Valued Landscape.**
- **Considers that as an NPPF Valued Landscape assigned a medium/high value in the EHDC Landscape Capacity Study, and within the landscape and visual setting of the SDNP, this tract of land must be treated as of High Sensitivity.**
- **Considers that the impact of the boiler house and/or stacks of the Proposed Development on the publicly accessible locations spread over this NPPF Valued Landscape of High Sensitivity would be significant, and major or major-moderate adverse, with or without the Green Walls.**
- **Considers that the Proposed Development would have significant adverse impacts on the SDNP and its setting and would not further national park purposes.**

Accordingly, having regard to the adverse major and major-moderate and significant impacts of the Proposed Development on the SDNP and its setting and an NPPF Valued Landscape this application must be refused.

Carbon Impact

In relation to the report prepared by Fichtner (ES Volume 3 Appendix 4.3) assessing carbon impact and the further report of 14 December 2020, the comments of CPRE Hampshire are set out below



The countryside charity
Hampshire

Assessment of carbon content of the waste to be processed by referring exclusively to waste collected in Wales. It is extremely unlikely that any of this waste will be processed by the plant and no effort is made to assess the carbon content of the waste that might actually be processed.

Comparison is made with landfill. However, no comparison is made with the much better option of increasing recycling rates, which are currently well below the target recycling rates of between 60% and 70%. Recycling is a much better way of minimising the carbon impact of treating waste and should be considered as the primary solution for waste treatment and not be ignored as is the case in this report. The failure to refer to recycling as the better option for measuring real carbon savings occurs in subsequent responses such as the response to the Atkins report. The carbon emissions calculations therefore use the wrong reference point and are almost certainly significantly overstated. Failure to increase recycling is likely to result in the building of incinerator plants that ultimately should not be needed.

It is highlighted that the net carbon benefit of the facility will probably reduce over time as the generation of electricity from other renewable sources increases. If the possibility of increasing recycling were to be factored in, then it is likely that the net benefit would reduce much further.

A carbon benefit arises if the waste heat is exported, yet the Applicant accepts that there are no current possible uses for the heat. It is suggested that as several large scale developments are being considered along the A31 that one of these would provide an opportunity for a District Heating scheme. In fact, since the planning application was submitted the suggested sites along the A31 at Alton have been assessed by East Hampshire District Council as NPPF Valued Landscapes and so major development must be in serious doubt. Clearly no such opportunities are foreseeable at present.

It is also the case that the electricity generated exceeds the demand for the whole of Alton and therefore there will be transmission losses that would not occur if it was located in a location with a higher immediate electrical demand.

The response to the section 25 letter does not include points raised by ACAN on the need to maximise the opportunity to install solar and or air/ground source heat pumps to maximise renewable energy generation from the site. Nor does it respond to the lack of plans identified in the Atkins Report designed to reduce carbon emissions associated with transport, combustion, and other operational processes.

Further, it is envisaged that all ERF plants will require to be fitted with Carbon Capture and Storage by 2050 at the latest, yet there is no room on this limited site for installation of CCS technology, which is anyway unlikely to be economically viable outside industrialised areas where it can be shared with other processes.

Accordingly, the carbon impact of the Proposed Development has not been justified



The countryside charity
Hampshire

Water Issues

CPRE Hampshire has nothing to add to the terms of the CPREH Objection

Traffic Issues

CPRE Hampshire has nothing to add to the terms of the CPREH Objection other than to welcome the offer by the Applicant of *"a written commitment that HGVs undertaking deliveries to the facility would not route via minor roads in the vicinity of the facility"*. If the proposal should be approved this needs to be an enforceable condition of planning approval, and needs to include the B3006 through Selborne, expressly, along with the commitment to forbidding short cut turns at the Hen & Chicken in Froyle.

Overall Conclusion

Accordingly, for the reasons set out in the CPREH Objection as supplemented by the responses set out above, CPRE Hampshire continues to consider that this proposal is not "the right development, in the right place, at the right time". The need for and benefits of the Proposed Development do not outweigh the significant adverse landscape and visual amenity effects. It should be refused.

CPRE Hampshire South Downs & Central Planning Group