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<i>Date</i>	25 March 2019	<i>Email</i>	laura.mcculloch@hants.gov.uk

For the attention of Conor Rafferty

Dear Sir,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017(the EIA
Regulations) – Regulations 10 and 11**

**Application by WTI/EFW Holdings Limited (the Applicant) for an Order
granting Development Consent for the Wheelabrator Harewood Waste-
to-Energy Facility (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details
and duty to make available information to the Applicant if requested**

Thank you for consulting the County Council on the EIA scoping report in relation to the above proposal.

The following comments have been made in the County Council's capacity as Waste Planning Authority and Local Highway Authority which are prescribed consultees. Comments are also provided in relation to the County Council's other duties and interests as an upper-tier authority.

Waste Planning Authority

The scoping report discusses the contribution of the site to maximising energy recovery from residual waste and complementing recycling activities, however it does not detail the need for the site in terms of waste capacity requirements both on a local and regional level. This should be included in the EIA in order to justify the proposal and demonstrate its contribution in accordance with

Policy 27 (Capacity for waste management development) of the Hampshire Minerals and Waste Plan (HMWP) (2013).

The scoping report highlights that policies 15, 25, 26 and 28 of the HMWP will be used to inform the EIA. Policy 15 relates to the safeguarding of mineral resources so it is assumed that this was referenced in error. Policy 26 relates to the safeguarding of existing waste management facilities and therefore is not considered relevant to this proposal.

The following policies have been omitted and therefore will need to be included:

- Policy 2 (Climate change – mitigation and adaption) - this policy should also be included to account for any impact a new waste development could have in providing adaption to climate change, both positive and negative;
- Policy 3 (Protection of habitats and species) and Policy 10 (Protecting public health, safety and amenity) – these policies are important given the proximity of the proposed site to these sensitive receptors;
- Policy 4 (Protecting designated landscapes) – this is relevant due to the proximity of the North Wessex Downs AONB;
- Policy 5 (Protection of the countryside) – this is relevant as the site is in open countryside;
- Policy 7 (Conserving the historic environment and heritage assets) – this is relevant due to the proximity of two scheduled ancient monuments and listed buildings in the area;
- Policy 12 (Managing traffic) – this should be included due to potential impacts arising from increased activities at the A303 site on the nearby strategic road network and the interaction with other policies (e.g. policies 3 and 10);
- Policy 13 (High quality design of minerals and waste development), Policy 27 (Capacity for waste management development) and Policy 29 (Locations and sites for waste management) - these are relevant as they offer guidance on the location and co-location of waste activities; and
- Policy 14 (Community benefits).

The scoping report states that the facility will be ‘Combined Heat and Power ready’, with provision of a heat off-take to supply a network being possible when a local heating demand becomes available. *The Resources and Waste Strategy*, published by Defra in December 2018, seeks to maximise the

efficiency of Energy from Waste plants by encouraging use of the heat the plants produce. Further consideration should be given in the EIA to the likelihood of a local network being established, and the implications of losing the heat should this not be practical or viable.

Local Highway Authority

The Local Highway Authority is satisfied that a full Transport Assessment will be provided to support any application, the scope of which will be agreed with the County Council and Highways England as the relevant Highway Authorities. The County Council has a pre-application highways advice service, the details of which can be found online at: www.hants.gov.uk/transport/developers/highwaysdevelopmentplanning/preapplication.

With respect to any trees within the highway, the impact of the proposal on these should be looked at in accordance with British Standard 5837 (2012).

Regarding Public Rights of Way, there are proposed modifications to the definitive map which will need to be considered. There are applications for the addition of a Restricted Byway from Longparish restricted Byway 50 to A303 road at Barton Stacey to the south of the application site (1196), and there are claims for routes to the southwest (1221) and northeast (1210). The attached map shows these routes which need to be included in the assessment.

Additionally, all Rights of Way and common land with public access need to be considered in terms of views of the proposal from sensitive receptors. The scoping report does not take into account all of the definitive Rights of Way, particularly Restricted Byways and Footpaths to the southeast. The Landscape and Visual Assessment and Environmental Assessment should therefore take into account impacts on the all of the Rights of Way and common land shown on the attached map, as per the requirements of the National Planning Policy Framework (NPPF). It also states that planning decisions should protect and enhance public rights of way and access, taking opportunities to provide better facilities for users.

Flood and Water Management

The Lead Local Flood Authority is satisfied that a Flood Risk Assessment will be submitted as part of the EIA. This should include a surface water drainage strategy, as per the County Council's guidance which can be found at www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning and includes recommended surface water drainage techniques.

Please note that if the proposals include any works to an ordinary watercourse require the prior consent of the Lead Local Flood Authority, under the Land Drainage Act 1991 (as amended by the Flood and Water Management Act 2010). Details can be found online at: www.hants.gov.uk/landplanningandenvironment/environment/flooding/changewatercourse.

Ecology

The County Council is concerned about the dismissal of all non-designated ecological receptors not immediately adjacent to the site despite Air Quality issues – this apparently includes all priority habitat. There is a need to scope in any ancient woodland (such as Harewood forest) and other Air Quality sensitive priority habitat such as coastal grazing marsh (such as that associated with the River Test) within striking distance of the Air Quality zone of influence. A 2km radius for SINC for scoping is therefore considered insufficient, and should be extended to deal with Priority habitat. Assessing the Air Quality impacts on statutory site only is insufficient given the extent of local ancient woodland and potential harm arising.

The known environmental considerations (figure 2.2) should be updated to include the SINC, as these too are known environmental considerations.

The assessment of the site in March 2018 was carried out too early in the season to be able to determine whether the site supports any botanical interest. The adjacent grassland SINC supports S41 species such as basil thyme which might occur on this site. A new botanical survey should therefore be conducted in May/June.

The scoped ecological receptors do not include protected species. There are important bat populations associated with the River Test and River Dever corridors and as such it is considered that three transect surveys is not sufficient, as it is unlikely that that site is of low suitability - especially in context of wider habitat suitability.

There is an important population of dormice in Harewood Forest and they are thought to extend throughout the A303 and A34 network and associated hedgerows, scrub and woodland. Given that there are hedgerows on site and along the site boundary, appropriate surveys need to be undertaken to establish whether dormice are in the vicinity and ensure that appropriate mitigation is provided if required. Enhancement with respect to this species is expected to form part of the enhancement package for ecology.

Additionally, the Striped Lychnic Caterpillar occurs on the verges alongside the application site and therefore should be considered where there are access points.

With regard to the Landscaping and Biodiversity Enhancement Plan, it will be necessary for the applicant to demonstrate measurable net gain as part of the proposals.

Archaeology and Historic Environment

The County Council is pleased to note that the impact, both physical and visual, on archaeological sites will be assessed. It is clear that the impact on

the setting of the scheduled ancient monuments will also be assessed using the Zone of Theoretical Visibility. The County Council is also reassured that the Hampshire HER will be included in the evidence base for the EIA, despite not being included in the scoping report. The County Council is therefore satisfied that archaeological issues are scoped in, and are appropriate to be scoped in.

The County Council notes that the impact on the built heritage has been scoped out of the EIA. Limited historic built heritage lies within the study area but, given the Zone of Theoretical Visibility, it is surprising that the impact on local historic buildings and conservation areas will not be considered. It is the view of the County Council that the impact on built heritage should be included within the scope of the EIA.

Landscape

The EIA needs to contain detailed information about connection to the National grid and the full landscape impacts of the selected route, whether it is above or below ground. The scoping report states this will be dealt with in the cumulative impacts section, but it should have its own complete assessment that is as detailed as the assessment for the main building. If the connection goes to Andover it will need to cross the Test River and its tributaries, Harewood Forest, open downland and Longparish Village which are all important landscapes.

The criteria for the Landscape Assessment is set out in section 7.10 and, in general, is acceptable. However, where Visual Susceptibility is concerned, it is suggested in table C.6 that residents at home are in both the Medium and High susceptibility categories. Residents at home should be placed in the High susceptibility category, regardless of where their home is located. This criteria should therefore be reviewed and amended.

It is suggested that an additional view be added from the A303 Barton Service Area, in particular the filling station forecourt. There will be clear views from here in the winter months, whilst it may not be the most important view it should not be ignored.

General Comments

In assessing scenarios, the EIA should include the plant commissioning phase and any noise, air quality or traffic impact which may arise from specific commissioning activities. For instance, the potentially significant effects of noise arising from boiler testing need to be considered. Night time working should also be included for completeness.

To enable a thorough assessment to be undertaken of the proposals it would be beneficial for the EIA to provide the following details:

- A description of the control systems to be utilised within the plant to prevent breaches in emission standards or unauthorised releases to air or the water environment;
- Details of waste water treatment for process effluents, ash handling areas and parking areas, roadways etc and processes for dealing with any spillages;
- Details of how fugitive emissions of dust or odour from the tipping areas will be controlled during periods of plant shutdown when extraction fans are not in operation;
- Any advance works required prior to construction e.g. vegetation clearance, utilities works etc;
- Justification for the proposed building and chimney heights and design taking into account operational and environmental constraints;
- Details of any above or below ground cabling works required to connect the plant to the national grid and the environmental effects of these;
- Construction and commissioning programme;
- Further details of how the proposed plant traffic will be managed to avoid any impacts on existing waste management activities at the site; and
- Additions to the CEMP to include the following topic areas: working hours, construction site layout and establishment, housekeeping, drainage, water quality, ecology, landscape, materials management, contamination/ground conditions, cultural heritage, road cleaning, site security, traffic management, parking and communications and reporting.

Finally, due to the scale of the proposal and the nature of the processes, it is requested that an additional chapter be included within the EIA on materials. This would provide an assessment of:

- The use of primary/secondary/recycled/manufactured material resources (including construction, operational and improvements materials);
- The handling, storage and reuse of soils; and
- The generation and management of wastes from site preparation, construction activities and residues from the combustion and emissions treatment systems.

If you have any queries concerning the above, please do not hesitate to contact my colleague Laura McCulloch on (01962) 846581.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Stuart Jarvis', with a stylized flourish at the end.

Stuart Jarvis
Director of Economy, Transport and Environment

