

HAMPSHIRE COUNTY COUNCIL

DELEGATED Decision Report

Decision Maker:	Director of Economy, Transport & Environment
Applicant:	Veolia Environmental Services (UK) Ltd
Proposal and location:	SCOPING OPINION: Re-develop the existing Material Recycling Facility (MRF) and Waste Transfer Station (WTS) at Land Off the A31 Nr Holybourne, Alton (No. SCO/2019/0612) EH141
Received:	6 August 2019
Report by:	Head of Strategic Planning

The Town and Country Planning (Environmental Impact Regulations (EIA) Regulations) 2017 Regulation 15 - Request for a Scoping Opinion

The Environmental Impact Regulations (EIA) Regulations (2017) allow for a developer to ask the local planning authority for their formal opinion (a 'Scoping Opinion') regarding the information to be supplied in the Environmental Statement (ES). This provides clarity as to what the local planning authority considers the main effects of the development are likely to be, and accordingly, the main topics on which the ES should focus.

Hampshire County Council (HCC) has provided this Scoping Opinion in response to the information provided by the developer on 06 August 2019. In providing this response, consultation has been undertaken with the relevant statutory authorities, along with the relevant Parish Councils. In addition, numerous representations (approximately 200) have been received from local people and interested third parties.

General

The proposed development involves the redevelopment of the existing Material Recycling Facility (MRF) and Waste Transfer Station (WTS) site on land off the A31 near Holybourne, Alton as an Energy Recovery Facility (ERF).

The ERF would be capable of storing, sorting and treating (through combustion) 330,000 tonnes of imported residual waste (waste left over following re-use and recycling) per annum, all of which would be delivered by road. All combustion ash and treatment residues would also be removed from by road.

The ERF would comprise one main building that is sub-divided into several sections involved in the reception, storage, and combustion of wastes, plus other ancillary ones involved in stages of the process. Additionally, plant, machinery and other infrastructure, internal roads and parking areas, fencing, plus hard and soft landscaping are also included. The ERF would generate electricity (approx. 30 MW) as a bi-product from the steam driven turbines on-site, and supply to the National Grid.

The ERF would be approximately 140m long and be between 55m to 100m and width. At its highest point (boiler hall and flue gas treatment facility), and the building would stand to 50m and between 35m to 40m above ground level respectively. The roof of the tipping

hall, the lowest point, would stand between 15m to 20m in height. Two 90m high stacks (chimneys), required to disperse cleaned flue gases, would be located adjacent to the ERF.

The Site

The existing Material Recycling Facility (MRF) and Waste Transfer Station (WTS) site occupies an area of 2.8 hectares. It is located approximately 600m east of the village of Holybourne and 2km east of the town of Alton, in a largely undeveloped, rural area. Vehicular access and egress is achieved from the nearby westbound A31 dual carriageway.

The existing MRF and WTS site is bounded by the A31 to its north, open fields to its east and the railway line to its south. To its west, is the Holybourne Oil Terminal pumping station and beyond that, the IGas Holybourne Oil Terminal, an oil storage and rail terminal. Oil (two) and gas pipelines - running between the south coast and London - run through these terminals and beneath the eastern edge of the existing MRF and WTS site.

The existing MRF and WTS site has planning permission to accept 125,000 tonnes of non-hazardous waste per annum. Planning permission (ref: F33619/004) was granted in 2003 and the site commenced operations circa 2005. The permission also includes 'ancillary depot uses'. The main building occupying the site stands to a maximum height of 15m above ground level.

Scoping Report

The proposed Energy Recovery Facility (ERF) is deemed to be a Schedule 1 development under the Environmental Impact Regulations (EIA) 2017:

10. Waste disposal installations for the incineration or chemical treatment (as defined in Annex I to Directive 2008/98/EC under heading D9) of non-hazardous waste with a capacity exceeding 100 tonnes per day.

EIA is mandatory for all Schedule 1 developments.

The submitted Environmental Impact Assessment (EIA) Scoping Report proposes the following scope of the Environmental Statement [ES]:

- VOLUME 1 - Non-Technical Summary;
- VOLUME 2 - Environmental Statement (Main Report):
 - Introduction
 - Scope of the EIA
 - Alternatives Considered
 - Scheme Description and Construction Methods
 - Landscape and Visual Assessment
 - Ecology and Nature Conservation
 - Noise and Vibration
 - Air Quality
 - Cultural Heritage
 - Socio-Economics

- Summary of Effects
- VOLUME 3 - Figures
- VOLUME 4 - Technical Appendices

The submitted EIA Scoping Report proposes scoping out the following issues from the ES:

- Ground Conditions and Hydrogeology
- Surface Water and Flood Risk
- Traffic and Transport

The Scoping out of 'Ground Conditions and Hydrogeology' is not agreed with. The County Council will comment in more detail in the **Commentary** section.

The Scoping out of 'Surface Water and Flood Risk' and 'Traffic and Transport, as proposed is agreed with, subject to additional information being included as detailed in the **Commentary** section.

The EIA Scoping Report does not appear to consider (scoping in or out) 'specific' chapters on or detail explicitly how the following material matters, which should be included to comply with Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. They are:

- Design and Appearance
- Sustainability and Climate Change
- Cumulative Impact/Effects

The County Council will comment in more detail in the **Commentary** section below.

Consultations

Alton Town Council

The Town Council noted the Scoping Report's content as a technical document.

Froyle, Binsted and Bentley Parish Councils

In summary, the Parish Councils all noted that the proposed development is of significant size and scale both physically and in terms of waste handling capacity, when compared to any other Veolia run site in Hampshire. They were disturbed at the choice of this site - in a rural area of north Hampshire - and would like to know why existing sites cannot be expanded to accommodate the additional capacity sought in this proposed development.

Their shared concerns include that a rural area is an inappropriate location for such a large, industrial building/facility; adverse air quality and pollution impacts (from HGVs and the facility itself); adverse impacts on the health and well-being of local residents; adverse impact on local businesses and visitors to the locality; adverse impact from pollution on surface water and groundwater quality; adverse visual impact (including on the local landscape, the South Downs National Park, nearby Listed Buildings and Conservation Areas); light pollution on locality; odour impacts on locality; further litter impacts on locality; increased risk from vermin; noise pollution and vibration impact on locality, particularly at night-time; adverse impact on local ecology and biodiversity (including designated sites down wind of the facility); adverse impact on local road safety and capacity, including through country roads within the Parish of Bentley; and adverse

cumulative impacts (mainly traffic, noise, air quality and contamination) with other permitted and committed land uses.

East Hampshire District Council

Advised that any application must assess impacts on infrastructure, soil resources, contamination impacts, development phasing and due to its size, visual impacts on the local landscape (including on the South Downs National (Park)). Lastly, cumulative impact through traffic movements on the local road network, including on local rural roads, from all development (allocated/planned/under construction) within the Alton area.

Environment Agency

Advised that the site overlies the Chalk, a principal aquifer, and due to the nature of proposed activities on the site, potential for release of hazardous and polluting substances exists. Dependent on these details significant and long-term impact to groundwater/principal aquifer could be caused.

Concerning oil/ammonia/chemical storage and distribution if this is above ground then this can be dealt with through sufficient containment management/pollution prevention through the planning process. If there is any below ground storage, then there is a significant potential that the proposal will not meet Agency groundwater protection criteria (outlined in their position statement on groundwater protection). Given the locality on the Chalk, a principal aquifer, then Oil/ammonia/chemical storage and distribution should be scoped in to any EIA.

Legacy Contaminated land - We are happy to deal with this through the phase 1 investigation as part of any planning application. Based on the results there may be requirement for further phases/intrusive investigation. This should be able to be managed through conditions on the planning application.

Trade effluent disposal - The site is not on mains sewage, there is limited information though on the scoping opinion regarding waste water generated from this site.

Historic England

Advised that this application should be determined in accordance with national and local policy guidance and based on expert conservation advice.

Natural England

Advised that their statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Further case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether to grant planning permission. Annex A below provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.

- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (Ecia) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

Ecia is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. Ecia may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition, paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is within the impact risk zone of the following designated nature conservation site(s):

- Upper Greensand Hangers: Whyte to Wheatley SSSI and Bentley Station Meadow SSSI
- Further information on the SSSI and its special interest features can be found at www.magic.gov.uk
- The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- European site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information, there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance

by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible, to avoid adverse impact on sensitive areas for wildlife within the site, and if possible, provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes

As the development site is near to the South Downs National Park, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for South Downs National Park.

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced.

Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

7. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

South Downs National Park Authority

Given the proximity to the SDNP, the landscape and visual impact of the proposal will need to be properly assessed within the ES and it must include a Landscape & Visual Impact Assessment as proposed by the submitted scoping report.

I would expect to see from the applicant, in accordance with the Guidelines for Landscape and Visual Impact Assessment (2013), the following information:

- The extent of the proposed study area.
- Sources of relevant information.
- The nature of possible effects and their likely significance.

- The main receptors (landscape and visual) identified.
- The extent of and proposed level of detail for the baseline studies.
- Method for determining significance.
- Whether cumulative effects will be assessed.
- Whether the site contributes to the landscape and/or visual setting of the National Park, (Defra circular explains the role of National Parks)

I recommend the LVIA responds to the site's location close to the South Downs National Park boundary and clearly explores, using evidence, how much the proposed development will impact the setting of the National Park, both in visual and landscape character terms. This will be a fundamental element of the Baseline Studies as it will help to determine the significance of any effects upon the National Park and its Purposes. It will require a synthesis of multiple strands of evidence to produce a holistic understanding of the site.

Assessments must also take into account ancillary features - fencing, lighting columns, etc. rather than just the building.

I recommend the following examples should form part of the sources of information used to inform the Baseline evidence and understanding of this site:

- South Downs National Park Integrated Landscape Character Assessment (2011)
- Local Landscape Character Assessment (East Hants)
- Historic Evidence (maps, historic landscape characterisation)
- South Downs National Park Viewshed Characterisation and Analysis (2015)
- South Downs National Park Tranquillity Study (2017)
- South Downs Partnership Management Plan
- South Downs Green Infrastructure Framework

Officers of the SDNPA note that potential viewpoints have already been identified for the LVIA. It is important to assess extent of any visibility of the National Park from outside of the park not just within the park and it is noted that these appears to be included with the scope of the LVIA.

Other Matters

Grid connection

The SDNPA acknowledge that the intention at this stage is to route underground via highway, but in the event that alternative means of connection become necessary potential impacts to the SDNP may need to be considered.

Habitat impacts

Whilst more a matter for your Ecology Consultee, I would raise that consideration is given within the ES of any potential impacts to nearby designations within the SDNP - e.g. East Hampshire Hangers and Shortheath Common SACs. The SDNPA notes that these SACs have been identified in study. 5.3.7 mentions sensitivities. There is also at least one local wildlife site identified in the list that is within the SDNP (Forty Acres Wood).

Finally, I would like to take this opportunity to stress the importance of the submission of a detailed Landscape and Visual Impact Assessment which thoroughly considers the visual impact of this significant proposal on the South Downs National Park. Concerns are raised about sensitive receptors around Selborne for example, adverse visual impacts will need successful design-led mitigation measures.

Hampshire County Council - Archaeology

Advises that the archaeological potential of the site is likely to be largely negligible with the areas of moderate potential in undisturbed locations likely to be marginal. The impact on historic

buildings and historic views will of course be to some extent dependent on the design. It is noted that Chapter 9 of the EIA will address the Cultural Heritage (para 14.0). Comments that archaeological matters are unlikely to emerge as 'main' or 'significant' (para 1.4.3) due to the past land uses at the site, both buildings and railway sidings, but they are none the less a material consideration, even if a less than significant one. It is acceptable for archaeological matters be addressed within the Cultural Heritage chapter, but if they are scoped out of the EIA itself as not meeting the criteria of para 1.4.3 the application would none the less need to be supported by a Heritage Statement to address archaeological matters (in particular to assess the impact of past development in order to identify residual area of archaeological potential).

Hampshire County Council - Ecology

The known Great Crested Newt breeding ponds are within dispersal range of the site. The report sets out that the road would be a significant barrier, however, it is known that large highways are permeable to this species, especially if road drainage facilitates connectivity. A more robust defence of this issue will need to be presented within the ES with conclusive evidence that the animals would be unlikely to be present within the site. Measures to ensure that the site is cleared sensitively as an avoidance measure should be considered.

Concerning water quality/hydrology, the scoping report only picks up construction impacts as an impact pathway. The very close proximity of the site to the river may indicate that surface water flows form an integral part of the hydrological regime of the water course (dependant on the connectivity under the railway embankment). These impacts will need to be examined, in addition to operational survey water flows as an impact pathway.

With respect to locally designated sites', impacts arising from airborne pollutants need to be scoped in as potentially impacting receptors such as priority habitats and locally designated sites (such as the adjacent floodplain grazing marsh, and Ancient Woodland site 0.6km to the north). Only scoping in statutory designated sites will not fully address the issue. Please consider the weighting of these issues as set out in Policy 3 of the Hampshire Minerals and Waste Plan.

On general biodiversity issues, though some survey results are still outstanding (notably dormouse) the proposals should aim to minimise the impacts to the contribution of the site to the wider landscape level network of ecological interest. The habitats within and adjacent to the site will need to be described in terms of Priority Habitats, and proper weight to the contribution of these habitats and that of locally designated sites given. Contribution to ecological networks and biodiversity net gains with appropriate buffering to adjacent sites and native planting/landscaping to enhance existing networks will be positively received.

Hampshire County Council - Highways

The development will be of a scale that the applicant will need to provide a Transport Statement (TS). This will assess the transport and highway impact of the proposed development and identify suitable mitigation measures. The TS should set out the baseline traffic and transport conditions, provide trip generation and distribution information and assessment of local junctions using industry standard capacity models. The assessment should also review the latest available personal injury accident information for a five-year period and set out suitable mitigation proposals.

Hampshire County Council - Landscape

- 1) The scoping report's proposed methodology for a Landscape & Visual Impact Assessment (LVIA), in accordance with the Guidelines for Landscape and Visual Impact Assessment (2013) (GLVIA 3rd Edition), is acceptable, in principle.
- 2) It is noted that this LVIA will form part of an Environmental Statement (ES). The range of viewpoints set out in the Scoping report is not adequate and it needs to cover a wider range of

views in particular views from St Swithun's Way, which is a very well used path and the A 31. A plan is attached to this report that shows additional view locations.

3) With regard to information provided on Visual Impact:

- Additional viewpoints as set on the attached plan are required.
- Views from individual properties including: - Hawbridge Farm, Bonhams Farm, houses on the north side of the A31 to the north east of the site, properties on high ground in Alton and at the eastern end of Holybourne.
- Visualisations/ Montages of the proposals will be required from a number of locations, in particular St Swithun's Way, the A31, the edge of the South Downs National Park and adjacent to Hawbridge Farm. There is significant concern that not only will the chimneys break the skyline, but the building will as well.

4) The scoping report suggests that the Landscape Character assessment will only address the issues set out in the HCC and District Landscape Character Assessments. This would be an inadequate assessment for this site and the magnitude of the proposed development. The EIA needs to address the landscape effects on the following issues

- Impacts on the landscape elements, including topography, vegetation, the valley landscape and river.
- The landscape effects on the aesthetic and perceptual aspects of the landscape.
- The effects on the experiential elements of the landscape

When assessing the impact on the landscape character in relation to the HCC Integrated Landscape Character Assessment area 3F: Wey Valley, the particular points that need to be addressed are as follows:

- In the description of the Experiential / Perceptual Characteristics of this landscape it states that *'From the valleys sides there are more open views across the valley floor and up and down the valley but in all cases the sense of place of this landscape is determined by the valley form.'* It goes on to say: *'This is an accessible landscape with numerous footpaths linking the historic settlements.'*
- In the Evaluation of the character area, 'Forces for Change' where it highlights particular issues of concern, it states in point 4 *'Potential development of masts or other vertical structures particularly on the edges and outside of this area.'*
- Finally, under the 'Key Qualities and Effects of Forces' in point 7.4 it states the following *'Open views across the Wey Valley from the northern valley slopes with a clear uninterrupted ridges and skylines and importance of the chalk bluffs backdrop.'* It goes on to state under threats: *'Potential of the vulnerability of open uninterrupted skylines to tall vertical structures which break the flow of the landscape and undermine the scale of the valley. Sensitivity of high visibility of changes on the valley sides and potential for inappropriate or visually intrusive development and woodland felling.'*

It can be seen from these points that there is great concern about the potential impacts of tall structures within the Wey valley and the possibility that they will break the skyline. From the location shown on the photo attached to this document (taken from the St Swithun's Way right of way), it appears likely that not only would the chimneys break the skyline, but the building would as well.

5) The grid connection needs to be addressed in the EIA. The scoping report suggests that it will all be contained within the highway. However, if it is buried into the verges this is likely to have a significant effect on existing vegetation and this needs to be detailed within the report. Loss of roadside vegetation may result in increased visual intrusion for local residents, rights of way etc or a downgrading of the road side environment.

6) In the scoping report under alternatives, it is not suggested that alternative sites have been assessed. However, for a development of this size and significance I would expect to see a rational as to why this site has been selected, it is not acceptable to assume just because the

land is already owned by the developer that it is the only site. This proposal would be very intrusive on this site and the site is very small to accommodate such a large development.

7) There are significant landscape concerns at this stage about the proposal to build an Energy Recovery Facility on this site. It is situated within an intimate landscape on the valley floor. The valley floor is a small-scale landscape with small fields, this is proposal on a completely different scale. The development has the potential to swamp the valley with its scale and height, breaking skyline views.

Hampshire County Council - Lead Local Flood Authority

Due to the size of the development, we would expect to see a full Flood Risk Assessment with a surface water drainage strategy. Also, any works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, will require the prior consent of the Lead Local Flood Authority. This consent is required as a separate permission to planning.

Network Rail, Lasham Airfield and HSE were also all notified.

Commentary

Whilst the LPA generally agrees with the issues identified by the submitted Scoping Report, there are areas of disagreement over matters proposed to be scoped in and out, matters requiring clarity and/or additional supporting information to be submitted within any planning application and its accompanying Environmental Statement (ES). These are based upon the consultation responses from the scoping process, the EIA Regulations 2017 and relevant planning policy and guidance. Of particular note are the responses from **East Hants DC (EHDC), EA, Natural England (NE), South Downs National Park Authority (SDNPA) and Hampshire County Council's - Ecology, Landscape and Lead Local Flood Authority** as detailed in **Consultations** section of this report.

The other matters arising from the submitted Scoping Report to be included within the ES (to meet the requirements of Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017) and/or the planning application include:

- The proposed built development/project should be a Design-led scheme, taking into account the locality and its rural nature, the size and scale of the ERF and how it's design and appearance can aid its integration into this setting (in conjunction with Landscape and Visual Impact). No details, written or diagrammatic, have been provided nor have they been 'scoped in'. This consideration should be included in the ES and the planning application.
- Consultees including EHDC, NE, SDNPA and HCC's Landscape, all identify issues relating to the visual impact of the proposal on the local landscape and its character and setting. A number of additional viewpoints supplementing those proposed are required (HCC Landscape's response with plan attached) within the ES.
- All LVIA Assessments within the ES must also take into account ancillary features - fencing, lighting columns, works associated with connection to the National Grid etc. within the proposed development rather than just that of the ERF building.
- In terms of assessing the significance of the proposed development's impacts and effects as a sustainable development and on climate change, there is no mention as to how the proposed ERF would impact on and, if necessary, mitigate against effects (during

construction and operational periods) on these material planning considerations in accordance with the requirements of Hampshire Minerals and Waste Plan (HMWP) (2013) and the National Planning Policy Framework (NPPF) (2019). This should be included within the ES (see 6. in Annex A accompanying Natural England's response relating to the natural environment).

- Paragraph 3.10.1 states that Part 4 of the GPDO (2015) as amended will be used to permit the use of temporary construction compounds and facilities during construction of the proposed ERF, if permitted. Permitted development rights are withdrawn with EIA development and cannot be relied upon here. The use of these temporary structures etc should be considered within the 'construction impacts' section of the ES.
- Paragraph 3.12.2 within the Scoping Report does not mention 'alternative locations or sites' as having been considered and why any were ruled out. This should be included within the ES.
- Whilst Paragraph's 4.41 to 4.47 in the Scoping Report advise how the proposed development's Cumulative Effects will be assessed and interpreted (to accord with 5(e) of Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017), the short, medium and long-term (i.e. temporary and permanent) effects on the locality, including on those living and working in close proximity, and including visitors to and those travelling through it, must be undertaken and presented within both the ES (within individual chapters or within a stand-alone chapter) and the planning application (see 7. in Annex A accompanying Natural England's response).
- 'Ground Conditions and Hydrogeology' should be 'scoped in' to the ES as the proposed development is situated on principal aquifer (Chalk) and proposes the combustion and storage of significant volumes of waste materials, plus fuels and chemicals, some of which will be below ground level and into the Chalk aquifer or affecting any natural or man-made protective cover. The EA advise that significant and long-term impact to groundwater/principal aquifer could be caused by the proposed development, conflicting with their policy on groundwater protection and the requirements of Hampshire Minerals and Waste Plan (HMWP) (2013) and the National Planning Policy Framework (NPPF) (2019).
- Whilst the County Council agrees that 'Surface Water and Flood Risk' can be scoped out of the ES, a full Flood Risk Assessment (FRA) must be undertaken as the site exceeds 1 hectare in area. This should be included within the planning application.
- Whilst the County Council agrees that 'Surface Water and Flood Risk' can be scoped out of the ES, a full and up to date site drainage scheme - including an assessment of surface and foul water drainage capacity - must be undertaken. This should be included within the planning application.
- Whilst the County Council agrees that 'Traffic and Transport' can be 'scoped out' of the ES, in terms of assessing the significance of the proposed development's impacts and effects as a sustainable development, no mention of the use of rail for waste and/or combustion residue movement within the Traffic and Transport. This should be included within the 'scoped out' Traffic and Transport section of the planning application.
- Whilst the County Council agrees that 'Traffic and Transport' can be 'scoped out' of the ES, in terms of assessing the significance of the proposed development's impacts and effects the impact of additional traffic by heavy vehicles not just on the local road network (A31) but also the wider connecting highway network must be addressed. This includes roads that run through the SDNP, small villages and the rural district of East Hampshire. Allied to this is the need for the report to consider the cumulative impact of traffic generation arising

from development approved, planned, allocated and under construction in the Alton region. This should be included within the 'scoped out' Traffic and Transport section of the planning application.

- Although no response has been received from Lasham Airfield, due to the size and scale of the proposed development the County Council requires that an assessment on aviation safety must be undertaken in accordance with current UK aviation safeguarding specifications. This should be included within the planning application and take account of both construction operations (particularly where cranes are involved) and the operation of the proposed ERF, if permitted. It is recommended that consultation with other local aerodromes and airports, including but not limited to Farnborough, Southampton and London Gatwick, is undertaken
- Although no response has been received from Network Rail, due to the size and scale of the proposed development the County Council requires that an assessment on rail safety must be undertaken in accordance with current UK rail safeguarding specifications. This should be included within the planning application and take account of both construction operations and the operation of the proposed ERF, if permitted.

Summary

An Environmental Statement and associated assessment methodology submitted in accordance with the Scoping Report (received August 2019) and including the additional content recommended by this report, addressing the comments within the **Commentary** section of this Scoping Opinion, would meet the requirements of Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Case Officer **Sam Dumbrell**

Date..... **27 September 2019**.....

Authorised on behalf of the Director of the Economy, Transport & Environment

..... **Chris Murray**.....

Date..... **27 September 2019**.....