



SCOPING OPINION:

Wheelabrator Harewood Waste to Energy Facility

Case Reference: EN010104

Adopted by the Planning Inspectorate (on behalf of the Secretary of State pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

April 2019

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 22 February 2019, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from WTI EfW Holdings Ltd (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Wheelabrator Harewood Waste to Energy Facility (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion '*as to the scope, and level of detail, of the information to be provided in the environmental statement*'.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled 'Wheelabrator Harewood Waste to Energy Facility EIA Scoping Report' (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
 - (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment; and*
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).
- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from

requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
 - (a) *a plan sufficient to identify the land;*
 - (b) *a description of the proposed development, including its location and technical capacity;*
 - (c) *an explanation of the likely significant effects of the development on the environment; and*
 - (d) *such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on '*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.
- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.

- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. On 26 June 2018 The European Union (Withdrawal) Act 2018 received Royal Assent and work to prepare the UK statute book for Brexit has begun. The European Union (Withdrawal) Act 2018 will make sure that UK laws continue to operate following the UK's exit. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Scoping Report section 2 and 3.

2.2.2 The Proposed Development comprises a waste to energy facility with a capacity of approximately 65 megawatts (MW) gross electrical output, capable of producing low carbon electricity and heat through waste derived fuels that would be exported to the national grid. It will contain two combustion lines, the combined maximum capacity of which will be 500,000 tonnes of fuel per annum (tpa). The Proposed Development will comprise the following components:

- A fuel reception and storage building of up to 45m in height including a weighbridge gatehouse, a tipping hall, a waste bunker and stores/ workshops;
- A boiler house of up to 55m in height;
- An air cooled condenser of up to 40m in height
- Two emission stacks of between 90 – 100m in height;
- Stack gas emission control equipment and flue gas treatment plant;
- Above ground distillate storage tanks for use at start up and as an auxiliary fuel;
- An ash collection area;
- Administrative offices; and
- A substation and mains transformer.

2.2.3 The Proposed Development is to be located at the A303 Enviropark at Drayton Road as shown in Figure 2.1 of the Scoping Report, approximately 1.8km north of Barton Stacey and 7km east of Andover. The site extends to 5.7 hectares on undeveloped grassland and is adjacent to the operational boundary of an existing waste and aggregate recycling facility, comprising a Materials Recycling Facility (MRF) and Incinerator Bottom Ash (IBA) Recycling

Centre to the east, beyond which there is a clay pigeon shooting range. The existing site offices and associated hardstanding car parking for the recycling facility are located in the south east corner of the site. The southern edge of the site is a private access road leading to the existing recycling facility, beyond which lies open space controlled by the Ministry of Defence. Agricultural fields and a solar farm generating station are located to the north of the site.

- 2.2.4 The Scoping Report states that the works required to connect the Proposed Development to the national grid have not been determined at this stage but that these works will be progressed by a Distribution Network Operator and will not therefore be included as part of the Proposed Development. The potential options for the connection works will, however, be considered as part of the cumulative effects assessment in the ES.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 The ES should include the following:
- a description of the Proposed Development comprising at least the information on the site, design, size and other relevant features of the development; and
 - a description of the location of the development and description of the physical characteristics of the whole development, including any requisite demolition works and the land-use requirements during construction and operation phases
- 2.3.2 The description of the Proposed Development within the Scoping Report is relatively high level at this stage. For example, the tallest building associated with the Proposed Development (excluding stacks) is described as "likely to be" 55m in height, but the heights of all required buildings/structures are not confirmed. Similarly, the information provided in respect of each aspect assessment within the Scoping Report is also at a relatively high level, which affects the Inspectorate's ability to provide detailed comments at this stage.
- 2.3.3 The Inspectorate expects that at the point when an application is made, the description of the proposed structures will be sufficiently developed to include the design, size and locations of the different elements of the Proposed Development. This should include the footprint and maximum heights of all proposed structures (relevant to existing ground levels) as well as land-use requirements for all phases and elements of the development. The description should be supported (as necessary) by figures, cross-sections and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out the design parameters that would apply, and how these have been used to inform an adequate assessment in the ES.
- 2.3.4 Maximum stack heights are described in the Scoping Report as likely to be between 90 – 100m above ground level (assumed to be existing ground levels). To ensure a robust assessment of likely significant effects, the ES

should confirm the maximum height and diameter of the stacks relevant to the existing ground level or proposed ground level as necessary. It should be clear what assumptions have been made in the relevant aspects to the ES regarding the location of visually prominent structures including the stacks, particularly with regards to the air quality modelling and the landscape and visual assessment.

- 2.3.5 The site preparation works presented in section 3.2 of the Scoping Report do not include reference to any demolition that may be required, however reference is made throughout the Scoping Report to a "demolition phase". Information should be included in the ES on the precise nature of the site preparation activities including; demolition (if required), earthworks and the associated likely significant effects. Such information should also include a description of the volume of material to be removed from the site and the finished ground level of the Proposed Development, both of which are yet to be finalised.
- 2.3.6 Construction of the Proposed Development is anticipated to last approximately 3 years and is expected to commence from March 2020. The ES should contain a general construction programme so that it is clear how and when the specific works will take place and how any resulting effects on the road network are to be managed. It should provide a description of the land use requirements during both the construction and operational phases. It is also important that the ES clearly identifies and distinguishes between areas of land or works which are required either permanently or on a temporary basis.
- 2.3.7 The Inspectorate notes from section 3.9.1 of the ES that reference is made to a Construction Environmental Management Plan (CEMP) although it is not clear if there is an intention to provide this as an application document. For the avoidance of doubt a draft/ outline CEMP should be provided with the application and the Applicant should make effort to agree the content the relevant consultation bodies.
- 2.3.8 The Scoping Report includes information on the Proposed Development in terms of technologies involved and production processes. The ES should include an estimate of the nature and quantity of materials and natural resources used (including water, land, soil and biodiversity). The ES should provide an assessment of the likely significant effects of the use of these materials and resources.
- 2.3.9 With regards to access arrangements the Scoping Report states that the junction into the site will be set back approximately 45m from the current priority junction. The ES should provide a detailed description of the finalised access arrangements for the Proposed Development including any works to the local road network. This should include information on construction access arrangements. The likely size and location of construction compound(s) should also be provided, and an explanation of how this information has been taken into account within relevant aspect assessment chapters to the ES.
- 2.3.10 The Inspectorate notes that there is a public foul sewer within the site boundary of the Proposed Development. The ES should clearly set out how the

design of the Proposed Development has taken this into account, and should ensure that any works required to address this point are adequately taken into consideration within the relevant aspect assessments in the ES. The Applicant should make efforts to agree its approach with the relevant consultation bodies.

- 2.3.11 No reference is made in the Scoping Report to any associated development. The ES should include a thorough description and assessment of the potential effects of any elements of the Proposed Development that are proposed to be included in the DCO application as associated development.
- 2.3.12 The Scoping Report does not provide any detailed information on the mitigation measures to be implemented to address any likely significant effects of the Proposed Development. The Inspectorate assumes that any necessary mitigation can be provided within the boundary as secured by the Development Consent Order, but in the event that this is not the case the Applicant should ensure that the ES sets out where any such mitigation shall be provided, and how this will be secured.
- 2.3.13 The Scoping Report states that the Proposed Development is expected to have an operational lifespan of 50 years, but that there is limited information available at this stage regarding decommissioning methods and timescales. The ES should provide the necessary detail regarding the decommissioning of the Proposed Development and the associated likely significant effects.

Alternatives

- 2.3.14 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.
- 2.3.15 The Inspectorate acknowledges the Applicant's intention to consider alternatives within the ES. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

- 2.3.16 The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a Rochdale Envelope approach for this purpose. Where the details of the Proposed Development cannot be defined precisely, the Applicant will apply a worst case scenario. The Inspectorate welcomes the reference to Planning Inspectorate Advice Note nine 'Using the 'Rochdale Envelope' in this regard.'
- 2.3.17 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any

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Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

- 2.3.18 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

3. ES APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'¹ and associated appendices.
- 3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.
- 3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The Applicant states that the designated NPS(s) relevant to the Proposed Development are the:

¹ Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

- Overarching NPS For Energy (NPS EN-1);
- NPS on Renewable Energy Infrastructure (NPS EN-3);
- NPS for Electricity Networks Infrastructure (NPS EN-5).

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- to demonstrate how the assessment has taken account of this Opinion;
 - to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
 - to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
 - to describe any remedial measures that are identified as being necessary following monitoring; and
 - to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

Baseline Scenario

- 3.3.2 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

Forecasting Methods or Evidence

- 3.3.3 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.4 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.5 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

- 3.3.6 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation

- 3.3.7 As discussed above, the Scoping Report does not provide any detailed information on the mitigation measures to be implemented to address any likely significant effects of the Proposed Development. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements.

Risks of Major Accidents and/or Disasters

- 3.3.8 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.
- 3.3.9 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

Climate and Climate Change

- 3.3.10 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where

relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

- 3.3.11 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Scoping Report has not indicated whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.12 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.
- 3.3.13 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

A Reference List

- 3.3.14 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.

4. ASPECT BASED SCOPING TABLES

4.1 Traffic and Transport

(Scoping Report section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	Table 7.3	Pedestrian delay; Pedestrian amenity; and Fear and intimidation	The Scoping Report proposes to scope out an assessment of these matters due to the location of the Proposed Development being outside built up and residential areas, and on the basis that no public rights of way are present within the vicinity of the Proposed Development. The Inspectorate agrees that these matters can be scoped out of the assessment on this basis, but should any further information come to light on rights of way within the locality of the Proposed Development the Applicant should make efforts to agree its approach with the local planning authorities.
4.1.2	Table 7.3	Community severance	The Scoping Report proposes to scope out an assessment of community severance on the basis that local roads will remain open and construction and operational traffic will use existing routes, which are not in close proximity to any built up / residential areas. The Inspectorate agrees that these matters can be scoped out of the assessment on this basis.

ID	Ref	Other points	Inspectorate's comments
4.1.3	7.2.9	Transport Assessment (TA)	The Scoping Report states the intention to undertake a TA to fully address the impacts of construction and operation of the Proposed Development on the transport network, to include the A303 and in particular the A303 Eastbound Barton Stacey Junction. The Inspectorate welcomes the intention to agree the scope of the TA with

ID	Ref	Other points	Inspectorate's comments
			the relevant consultation bodies. The ES should clearly explain the relationship with the TA and how it influences aspect assessments e.g. with regards to estimated traffic growth figures.
4.1.4	7.2.9	Traffic modelling	Limited information has been provided on the traffic modelling to be undertaken. The ES should describe the numbers and types of traffic movements associated with the construction and operation of the Proposed Development and set out and justify the assumptions made in calculating trip generation. The ES should also provide information regarding the anticipated transport routes which will be used to transport materials to and from the Proposed Development during construction and operation. The ES should explain if road closures will be required during construction phase and assess the impacts where significant effects are likely to occur.
4.1.5	7.2.11	HGV movements	The Scoping Report states that it is likely the main transport impacts will be associated with transporting materials, equipment, fuel and waste to the Proposed Development via the A303. The Scoping Report does not directly reference any material that is to be received but cannot be used by the Proposed Development. For the avoidance of doubt the ES should provide an estimate of the levels of such material and describe how it would be removed from the Proposed Development. Any significant effects associated with the storage and/or removal of such material should be assessed.
4.1.6	7.2.12	Study Area	The Scoping Report does not provide detail on the study area to be assessed for this aspect. The ES should clearly explain the exact study area used for the traffic and transport assessment, which should be determined by the extent of likely impacts. The study area should be shown on a supporting plan contained within the ES.
4.1.7	7.2.13	Sensitive receptors	The Scoping Report does not identify specific sensitive receptors for the purposes of the assessment, although paragraph 7.2.13 does

ID	Ref	Other points	Inspectorate's comments
			reference pedestrians and cyclists. The Applicant is advised to consider section 2.5 of the 'Guidelines for the Environmental Assessment of Road Traffic ' (IEMA, 1993) when identifying receptors which are sensitive to changes in traffic conditions.
4.1.8	7.2.13	Assessment of sensitivity	The Scoping Report refers to the use of professional judgement in assessing the sensitivity of receptors. Where professional judgement is used in the ES this should be thoroughly explained and justified. Furthermore, no definitions are provided for the various levels of sensitivity (i.e. 'very low' to 'high') within the Scoping Report. Such definitions should be provided in the ES.
4.1.9	Table 7.3	Road safety	The Scoping Report states that an assessment of recent road safety data will be undertaken to assess any existing trends or common casualties on the local highway network. The ES should clearly set out the road safety data that has been assessed in order to justify the conclusions drawn by the Applicant on this matter.
4.1.10	N/A	Relationship to other aspect assessments	It should be clear within the ES how the outcomes of the traffic modelling have informed other relevant aspect assessments, in particular the air quality and noise assessments. The Applicant should ensure appropriate cross referencing is in place within the relevant ES chapters.

4.2 Air Quality

(Scoping Report section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	7.3.8	Odour impacts	The Scoping Report seeks to scope this matter out of the air quality assessment on the basis that odour emissions can be controlled under normal operations by good design and good site practice measures. The Inspectorate does not believe that sufficient information has been provided at this stage to evidence that there would be no likely significant effects from an odour, and as such does not agree that it can be scoped out. The ES should clearly identify the relevant nearby receptors that could be affected by odour impacts such as the local recreational facilities, and clearly explain the design and good practice measures that would be in place to mitigate the odour impacts of the Proposed Development. Where significant effects are likely to occur, these should be assessed.

ID	Ref	Other points	Inspectorate's comments
4.2.2	7.3.2	Baseline monitoring	The Scoping Report states that a diffusion tube survey for nitrogen dioxide (NO ₂) is proposed at a number of locations along the local road network over a period of three months. The Inspectorate notes that recommended best practice is for NO ₂ monitoring to take place over a six month period, being three winter months and three summer months. The ES should indicate the dates on which the monitoring was undertaken, with the chosen monitoring locations depicted on an accompanying plan. The Applicant should thoroughly justify the reasoning for its three month monitoring and should make effort to agree the monitoring locations and survey durations with the relevant consultation bodies.

ID	Ref	Other points	Inspectorate's comments
4.23	7.3.4	Baseline concentrations	The Scoping Report states that the baseline concentrations of air pollutants associated with the operation of the Proposed Development other than NO ₂ are not expected to be elevated above concentration levels experienced at rural locations elsewhere in the UK and that published baseline measurement will therefore be used for other pollutants. The Inspectorate does not agree that sufficient information has been provided within the Scoping Report to justify the request to scope this matter out from the ES. The Applicant should establish a robust baseline for the purposes of the assessment through the use of specific air quality monitoring to establish baseline conditions for all relevant air pollutants associated with the construction and operation of the Proposed Development. The baseline data relied upon in the ES and for the purposes of the assessment should be relevant, up-to-date, and comprehensive.
4.24	7.3.5	Study area	The Inspectorate welcomes the Applicant's intention to agree the study area with the consultation bodies. The ES should clearly explain the exact study area used for the air quality assessment, which should be determined by the extent of likely impacts. The study area should be shown on a supporting plan contained within the ES.
4.25	7.3.5	Receptors	The Scoping Report refers to ecological, non-ecological and human health receptors throughout the air quality section. The ES should contain a comprehensive list of receptors, which should be shown on a supporting plan and effort should be made to agree the approach with the relevant consultation bodies.
4.26	7.3.5	Mobile plant exhaust emissions	The Scoping Report states that there is the potential for mobile plant exhaust emissions from construction works associated with the Proposed Development to have an impact on air quality. However, no study area has been provided in respect of this impact. The ES should clearly set out the study area for this matter. Effort should be made to agree the study area with relevant consultation bodies and should be

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ID	Ref	Other points	Inspectorate's comments
			depicted on an accompanying plan in the ES.
4.2.7	7.3.6	Other aspect study areas	The Scoping Report states that operational and construction phase impacts from traffic emissions will be quantified for the affected road links within the study area defined within the Traffic and Transport chapter, and that impacts from traffic emissions on ecological receptors will be considered within the study area defined within the Ecology chapter. Where the Air Quality chapter of the ES should clearly cross reference to other study areas used in other aspect chapters as relevant.
4.2.8	7.3.10	Stack height	The Scoping Report states that the ES will include an assessment of appropriate release heights for the stacks to be provided as part of the Proposed Development. The implications for air quality of stack height and dispersion of the discharge needs to be clearly explained in the ES. Dispersion modelling should consider a range of possibilities, where uncertainty exists and flexibility is sought, the assessment in the ES should be based on the worst-case scenario relevant to parameters in the DCO.
4.2.9	N/A	Chilbolton Observatory	The ES should assess the impacts from the Proposed Development on the Chilbolton Observatory. The assessment should take into account its role as a rural supersite that monitors air pollutants.
4.2.10	N/A	Priority Habitats	The Scoping Report states that the air quality assessment will include emissions associated with increased road traffic movements on nationally and locally designated sites. The ES should also assess potential impacts from the construction phase of the Proposed Development, both in terms of dust and emissions, on priority habitats and include clear cross reference to the Ecology chapter.

4.3 Human Health Assessment

(Scoping Report section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment

ID	Ref	Other points	Inspectorate's comments
4.3.2	7.4.3	Assessment of impacts on human health	The Scoping Report states that human health impacts will be addressed in each aspect chapter of the ES and that the health chapter of the ES will summarise and signpost to the findings in the other aspect chapters. The Applicant should ensure the survey methodologies, study areas and receptors relevant to the assessment of health impacts are clearly defined in the relevant aspect chapters. The assessment of health impacts should assess impacts during both construction and operation of the Proposed Development, and it should be clear how all necessary mitigation measures are secured through the DCO or other legally binding mechanisms. Following the Inspectorate's comments at ID 4.2.3 above, this assessment should address all relevant air pollutants associated with the construction and operation of the Proposed Development. The health chapter itself should provide a high-level summary of key information, risk assessments, proposed mitigation measures, conclusions and residual impacts.
4.3.3	N/A	Definition of health	The Scoping Report does not identify a definition of health. The ES should accept the broad definition of health proposed by the World Health Organisation (WHO) and also include specific reference to mental health within the definition of health, and an assessment of the impacts on mental health within the relevant aspect chapters.

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ID	Ref	Other points	Inspectorate's comments
4.3.4	N/A	Health determinants	<p>The Scoping Report does not identify the determinants of health and wellbeing that will be assessed. For the avoidance of doubt, the ES should include both social and ecological determinants of health and wellbeing in its assessment of impacts on human health.</p>

4.4 Noise and Vibration

(Scoping Report section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	7.5.5	Construction and operational vibration	The Scoping Report seeks to scope out an assessment of construction and operational vibration on the basis that the Proposed Development should not generate ground-borne vibration that will be perceivable at the nearest sensitive receptor. The Inspectorate does not consider that the Scoping Report provides adequate justification to support a decision to agree to scope out this matter from the assessment at this stage, in particular due to the limited information presented in the Scoping Report on the construction techniques to be used. The ES should include an assessment of these matters where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.4.2	7.5.2	Study area	The Scoping Report states that the study area has been determined by the locations of nearby sensitive receptors which are located within approximately 1.5km of the site and then provides a list of receptors located between 0.3km and 1.8km of the site. The ES should clearly explain the exact study area used for the noise and vibration assessment which should be determined by the extent of likely impacts. The Applicant should make effort to agree the study area with relevant consultation bodies. The study area should be shown on a supporting plan contained within the ES.
4.4.3	7.5.3	Noise sensitive receptors	The ES should contain a comprehensive list of noise sensitive receptors, including residential, recreational and ecological receptors, which should be shown on a supporting plan. The Scoping Report states that noise predictions will be undertaken on ecological receptor

ID	Ref	Other points	Inspectorate's comments
			locations detailed in the Ecology chapter. The ES should include clear cross references between the two chapters for clarity as to the precise receptors forming part of the noise assessment.
4.4.4	7.5.4	Construction impacts	The Scoping Report states that an assessment of construction noise impacts will be undertaken. As part of this assessment the ES should provide details on the construction programme and anticipated working hours, including any night time working that may be required. Details on the type, number and location of plant and equipment should also be provided, including information on simultaneous working and the length of time plant and equipment is due to be operational as well as details of any plant and equipment sound power/pressure level assumptions used to inform noise assessments. This information should be incorporated into the assessment of likely significant effects and the working hours used to inform the assessment should be consistent with those in the dDCO.
4.4.5	7.5.8	Baseline monitoring	The Scoping Report indicates that monitoring to develop the baseline will be required. The ES should clearly describe the approach taken with regard to baseline monitoring that informs the assessment. The description should include details such as; date, location, timing and the prevailing weather conditions during the surveys. The Applicant should make effort to agree the approach to baseline monitoring with relevant consultation bodies.
4.4.6	N/A	SOAEL/ LOAEL	The assessment should consider the requirements of the Noise Policy Statement for England and the need to establish Lowest Observed Adverse Effect Levels (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) thresholds for noise and vibration during construction and operation.

4.5 Ecology

(Scoping Report section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	Table 10-1	Impacts on hazel dormouse, badger, otter and water vole, and butterflies.	<p>Impacts on these species are proposed to be scoped out based on the Preliminary Ecological Appraisal (March 2018). The Scoping Report does not present this information, and therefore the Planning Inspectorate cannot confirm whether the decision to scope out the effect on these receptors from the assessment is justified.</p> <p>The ES should include evidence of the survey effort made to confirm habitat suitability / presence of relevant species including hazel dormouse, badger, otter, water vole and butterfly species. The Applicant should make effort to agree the level of survey effort required with relevant consultation bodies including Natural England. If the Proposed Development is likely to result in significant effects to any of these species the ES should provide an assessment on that basis.</p>
4.5.2	Table 7-7	Impact on great crested newts (GCN).	An eDNA survey has been undertaken for GCN at a nearby suitable habitat (identified during the Habitat Suitability Index survey), returning a negative result, indicating the water body does not support GCN. On the basis of the survey work undertaken, the Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.5.3		Mitigation and Enhancement	The ES should explain the measures proposed to address effects on biodiversity receptors and provide details as to how such measures will be secured.

4.6 Water Resources

(Scoping Report section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	7.7.19	Potential effects on isolated reservoirs around the site boundary	Scoping Report states that there are two reservoirs around the site boundary associated with existing industrial uses, that are unlikely to be hydrologically linked to WFD waterbodies. However, there is no evidence of hydrological modelling to support this statement. As such, the Planning Inspectorate does not have sufficient information to agree that this matter can be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.6.2	N/A	N/A	No further comments

4.7 Ground Conditions

(Scoping Report section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment. The Inspectorate notes that an intrusive site investigation has been undertaken, which will be appended to the ES, which concluded that it is unlikely that significant sources of contamination are present. The applicant should ensure that a full suite of intrusive surveys including borehole investigations and soil sampling are undertaken to inform the assessment.

ID	Ref	Other points	Inspectorate's comments
4.7.2	7.8.6	Construction effects	The ES should assess impacts associated with the mobilisation of existing sources of contamination. During construction the Scoping Report, indicates that piling may be required and the site is located over a principal chalk aquifer. The ES should assess impacts to this sensitive water resource feature taking into account the existing ground conditions and demonstrate that any anticipated significant effects are suitably mitigated.

4.8 Archaeology and Cultural Heritage

(Scoping Report section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	7.9.14	Built Heritage	The Planning Inspectorate does not agree to scope out the assessment of effects on built heritage receptors. The Planning Inspectorate considers that a 1km study area for impacts from the Proposed Development on the setting of cultural heritage assets is sufficient. In particular the Planning Inspectorate notes that the characteristics of the Proposed Development are such that visual impacts may extend over considerable distances. The Applicant should ensure that the study area applied to the assessment of effects on built heritage receptors is sufficient to address the extent of the likely impacts including visual impacts. Concerns in this regard have been raised through consultation and the Applicant should make effort to agree the study area and approach to the assessment with relevant consultation bodies. Any likely significant effects to these receptors should be presented within the ES.

ID	Ref	Other points	Inspectorate's comments
4.8.2	7.9.3 – 7.9.11	Receptors	In describing the baseline conditions the Scoping Report sets out the various archaeological and cultural heritage features and potential receptors within the study area. The ES should include reference to a plan clearly showing the location of all such receptors present within the study area.
4.8.3	7.9.6	Archaeological remains	The Scoping Report identifies a high potential for archaeological remains in the vicinity of the development. The Applicant should make effort to agree the approach to assessing impacts on known/unknown archaeological remains. The ES should assess any likely significant

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			effects on these receptors. The assessment in the ES should be informed by relevant survey effort including intrusive surveys as necessary. The ES should include definitions for the classifications given in the Scoping Report to ensure that an appropriate rating has been allocated for the purposes of establishing a baseline.
4.8.4	7.9.12	Construction impacts	The Scoping Report notes the potential impacts of the construction phase on archaeological remains. Consideration should also be given as to the impact of construction on the settings and appreciation of above ground heritage assets in the area, including the potential for impacts from alterations to drainage and ground water patterns e.g. resulting in subsidence of buildings and monuments.
4.8.5	7.9.20; 7.9.26	Professional judgement	The Scoping Report refers to the use of professional judgement in the assessment of significance. Where professional judgement is used this should be clearly presented and fully justified within the ES.
4.8.6	7.9.25; Table 7.10	Valuation of assets	The Scoping Report sets out the assessment criteria for determining the value of heritage assets. The Applicant should make effort to agree the criteria used for the assessment with relevant consultation bodies.
4.8.7	7.9.26	Impacts on setting	The Scoping Report proposes an assessment of impacts to the settings of heritage assets. The Applicant is referred to the staged approach to assessment set out in Historic England's 'The Setting of Heritage Assets: Planning Note 3'. The ES should include an assessment to setting from appropriate viewpoints. Photomontages should also be used to illustrate how the Proposed Development would be seen in views from key heritage assets. In addition to visual impacts, the assessment of impacts to the settings of heritage assets in the ES should consider impacts from other relevant aspects/ matters such as noise and traffic. The Applicant is also directed to the Inspectorate's comments at ID 4.8.1

4.9 Landscape and Visual Impact Assessment

(Scoping Report section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	7.10.13	Assessment of landscape effects and visual effects beyond 15km of the site	<p>The Scoping Report explains that the Zone of Theoretical Visibility (ZTV) has been established using SNH Guidance on wind farms. However, despite this guidance acknowledging impacts from tall structures (100m in height) could result in effects extending 30km from the Proposed Development the Applicant has concluded views which fall between 15km and 30km away are not likely to experience significant effects.</p> <p>The Scoping Report does not provide robust justification in support of the assumption that effects beyond 15km and within 30km would not be significant. The Scoping Report also fails to explain the reasons supporting the proposed viewpoints for assessment (39). The Inspectorate therefore does not agree to scope out an assessment of landscape and visual impacts beyond 15km of the site. The ES should assess all likely significant effects to landscape and visual receptors. The Applicant should make effort to agree the list of visual receptors and necessary viewpoints for assessment with relevant consultation bodies. Assessments should be undertaken to encompass both winter and summer views.</p>

ID	Ref	Other points	Inspectorate's comments
4.9.2	7.10.3	Zone of Theoretical Visibility (ZTV)	<p>The Scoping Report explains that a ZTV has been established, based on an agreed worst case scenario for building and stack heights. The ES should describe the model used, provide information on the area covered and the timing of any survey work and the methodology used to inform the ZTV. It should be explained how the ZTV has been</p>

ID	Ref	Other points	Inspectorate's comments
			refined (for example, to take account of topography and vegetative screening).
4.9.3	7.10.20	Construction	The ES should assess impacts with the potential to result in likely significant effects on landscape and visual amenity relating from loss of vegetation, use of the construction compounds and use of any other temporary structures/ features required for construction (such as soil stockpiles or cranes).
4.9.4	7.10.20	Historic Landscapes	The ES Landscape and Visual chapter should cross reference with the Archaeology and Cultural Heritage chapter when assessing the potential impacts to historic landscapes which are likely to result in significant effects.
4.9.5	7.10.22	Night time lighting	The impact of night time lighting should be assessed for both the construction and operational phases of the Proposed Development. The assessment should address impacts to aviation receptors and should also address impacts from the potential illumination of the plumes during night-time. The assessment should cross-refer to other relevant aspect assessments (such as ecology and cultural heritage).
4.9.7	N/A	Design	The ES should explain how the design of the proposed structures and the materials to be used have been selected with the aim of minimising impacts to landscape and visual receptors.

4.10 Climate Change

(Scoping Report section 7.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	7.11.8	Emissions from maintenance during operation	The Applicant concludes that emissions from maintenance during operation are likely to be minimal in proportion to the overall green house gas footprint and therefore proposes to scope them out of the ES. The Inspectorate agrees that this matter can be scoped out.
4.10.2	7.11.9	Decommissioning phase	<p>The Applicant states that the decommissioning phase of the Proposed Development is unlikely to lead to significant effects on green house gas emissions on the basis that greenhouse gas (GHG) emissions arising from the plant and vehicles is likely to be low, and it is anticipated that products and materials within the Proposed Development would be largely re-used and recycled rather than going to landfill.</p> <p>The Inspectorate agrees that having regard to the nature and characteristics of the Proposed Development significant effects on climate change during decommissioning stage are unlikely and this matter can be scoped out of the ES.</p>
4.10.3	Table 7.15;	Extreme weather events with regard to the combined impact of the development and climate change	The Scoping Report proposes to address this matter as part of the Flood Risk Assessment. Therefore, the Scoping Report argues that separate consideration as part of the Climate Change chapter is not required. The Inspectorate agrees that the FRA will include relevant information in this regard but advises that appropriate cross reference to the Flood Risk Assessment is included within this aspect chapter.
4.10.4	Table 7.15;	Precipitation in regard of the combined impact of the development and climate change	The Scoping Report proposes to address this matter as part of the Flood Risk Assessment. Therefore, the Scoping Report argues that separate consideration as part of the Climate Change chapter is not

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			required. The Inspectorate agrees that the FRA will include relevant information in this regard but advises that appropriate cross reference to the Flood Risk Assessment is included within this aspect chapter.
4.10.5	Table 7.15; Table 7.16	Sea level rise	The Inspectorate agrees that the Proposed Development is not in an area susceptible to sea level rise, and that this matter can be scoped out of the ES.
4.10.6	Table 7.15	Wind in regard of the combined impact of the development and climate change	Wind has been scoped in in regard of the vulnerability of the Proposed Development to changing wind patterns, but has been scoped out in regard of the combined impact of the development and climate change, due to the lack of wind climate projections as reported in the UKCP09. The Inspectorate directs the Applicant to UKCP18 which has upgraded the climate change projection tools available in UKCP09 but agrees that due to the receiving environment and characteristics of the Proposed Development significant effects are unlikely to occur. Accordingly the Inspectorate agrees to scope this matter out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.10.7	7.11.2 – 7.11.5	Study area	The Scoping Report lacks certainty on the study areas for the GHG impact assessment and the in-combination climate impact assessment. The ES should clearly explain the exact study area used for these assessments which should be determined by the extent of likely impacts. The Applicant should make effort to agree the study areas with relevant consultation bodies.
4.10.8	7.11.16; 7.11.20	Significance of effects	The Scoping Report states that significance of effects will be determined using a matrix comparing sensitivity of receptor to magnitude of impact but does not provide definitions for the various

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ID	Ref	Other points	Inspectorate's comments
			ratings. The ES should clearly set out such definitions to ensure that a robust assessment of significance has been undertaken.
4.10.9	N/A	Methodology	The guidance that is applied to the assessment of climate change and the methodology that is adopted should be set out in the ES. The ES should demonstrate that an appropriate guidance e.g IEMA 2017 has been used to assess greenhouse gas emissions and evaluate significance.
4.10.1 1	N/A	Assumptions, limitations and constraints	The ES should state any assumptions made in calculating the predictive GHG emission; any limitations to the calculations; and any uncertainties this presents for the assessment of GHG emissions.

4.11 Socioeconomics and land use

(Scoping Report section 7.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.11.1		Labour market absorption during operational stage	The Scoping Report states that approximately 50 full time jobs are expected to be generated to operate the Proposed Development alongside third-party haulage and supply chain opportunities. It concludes that this number is unlikely to significantly affect the labour market. The Inspectorate agrees that this is unlikely to result in significant effects to the labour market and this matter can be scoped out of the ES.
4.11.2		Effects of operational workers on community facilities and infrastructure	Due to the relatively small numbers of jobs expected to be generated by the Proposed Development during operation, the Inspectorate agrees that significant effects on community facilities and infrastructure is unlike and this matter can be scoped out of the ES.
4.11.3		Tourism	The Scoping Report states that 'the views of the Proposed Development from the closest tourism site are unlikely to affect tourism revenues'. However, further justification is not given. The Inspectorate does not agree to scope out an assessment of effects on tourism. The ES should assess impacts to nearby tourism receptors particularly impacts during construction which could be disruptive e.g. impacts to transport routes, tranquillity and visual amenity. The Applicant should make effort to agree the approach to assessing impacts on tourism and tourism receptors with relevant consultation bodies.

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ID	Ref	Other points	Inspectorate's comments
4.11.4	7.12.9	Baseline assessment sources	The Scoping Report states that the baseline assessment will be undertaken using established statistical sources. The ES should include a comprehensive list of all sources used for this purpose. The Applicant should make effort to agree the necessary baseline data sources for the assessment with the relevant consultation bodies.
4.11.5	7.12.11	Study area	No study area is defined for the purposes of the socioeconomic assessment. The ES should clearly explain the study area used for this assessment which should be determined by the extent of likely impacts. The Applicant should make effort to agree the study area with relevant consultation bodies.

4.12 Other Aspects

(Scoping Report section 8.2 – 8.5)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
4.12.1	8.2	Aviation	<p>The Scoping Report seeks to scope out effects of the Proposed Development on aviation due to the distance from the nearest airfields and the fact that the stacks provided as part of the Proposed Development will have lighting installed and will be charted for aviation purposes. However, the Inspectorate notes that the height of the stacks is not yet finalised as the Scoping Report states that they are "envisaged to be" a maximum of 100m. In light of this, the Inspectorate does not agree to scope this matter out from the ES. The ES should ensure that impacts associated with the specific characteristics of the Proposed Development are assessed where they are likely to result in significant effects. If details of the characteristics e.g. height of stacks cannot be confirmed prior to application and flexibility is sought the assessment should be based on the worst-case scenario.</p>
4.12.2	8.3	Major accidents and disasters	<p>The Scoping Report seeks to scope out an assessment of major accidents and disasters on the basis that accidental events will be discussed in the relevant chapters of the ES, and the majority of emergency response plans and contingency measures will be dealt with in the Environmental Permit. The Inspectorate advises that insufficient information has been provided agree with the Scoping Reports proposed approach in this regard. The ES should include an assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development, including an assessment of the 7 Feeder Barton Stacey/ Mappowder major accident hazard pipeline within the application boundary. The assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster as well as the</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			Proposed Development's potential to cause an accident or disaster. Any measures that will be employed to prevent and control significant effects should be presented in the ES.
4.12.3	8.4	Electronic interference	The Scoping Report seeks to scope this matter out from the assessment on the basis that affected properties will be able to receive services from other transmitters or utilise FreeSat or another free to air satellite service that would not be impacted by the Proposed Development. The Inspectorate advises that insufficient information has been provided to allow agreement to scope this issue out at this stage. The ES should include an assessment (where relevant) of the likely significant effects resulting from overshadowing applicable to the Proposed Development.
4.12.4	8.5	Daylight, sunlight and overshadowing	The Scoping Report seeks to scope this matter out from assessment on the basis that the majority of receptors are too far away to be affected with the exception of the neighbouring solar farm for which appropriate compensatory measures will be agreed with the operator. The Inspectorate advises that insufficient information has been provided to allow agreement to scope this issue out at this stage and that in any event the overshadowing effects should be assessed on the basis of the stack height. The ES should include an assessment (where relevant) of the likely significant effects resulting from overshadowing applicable to the Proposed Development.

5. INFORMATION SOURCES

- 5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:
- Pre-application prospectus²
 - Planning Inspectorate advice notes³:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts;
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.
- 5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

² The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

³ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁴

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS West Hampshire Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - London and the South East offices
The relevant fire and rescue authority	Hampshire Fire and Rescue Service
The relevant police and crime commissioner	Hampshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Longparish Parish Council Barton Stacey Parish Council
The Environment Agency	The Environment Agency - Solent and South Downs
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Hampshire County Council Highways Authority
The relevant strategic highways company	Highways England - South East
Public Health England, an executive agency of the Department of Health	Public Health England

⁴ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - South East and London
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁵

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Foundation Trust	South Central Ambulance Service NHS Foundation Trust
Railways	Highways England Historical Railways Estate
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant water and sewage undertaker	Southern Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited

⁵ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

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STATUTORY UNDERTAKER	ORGANISATION
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Southern Electric Power Distribution Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))⁶

LOCAL AUTHORITY ⁷
Test Valley District Council
Hampshire County Council
Basingstoke and Deane District Council
New Forest District Council
Eastleigh District Council
Winchester District Council
New Forest National Park Authority
West Berkshire Council
Wiltshire County Council
Southampton City Council
South Downs National Park Authority
Wokingham Borough Council
Portsmouth City Council
West Sussex County Council
Surrey County Council
Bracknell Forest Borough Council
Dorset County Council

⁶ Sections 43 and 42(B) of the PA2008

⁷ As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Barton Stacey Parish Council
Basingstoke and Deane Borough Council
Bracknell Forest Council
Civil Aviation Authority
Environment Agency
ESP Utilities Group Ltd
Forestry Commission
Hampshire County Council
Hampshire Police and Crime Commissioner
Harlaxton Energy Networks Ltd
Harlaxton Gas Networks Ltd
Health and Safety Executive
Highways England
Historic England
Longparish Parish Council
Ministry of Defence
National Grid
NATS
Natural England
New Forest District Council
Portsmouth City Council
Public Health England

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Southern Water

Test Valley Borough Council

Winchester City Council

Barton Stacey Parish Council response to Scoping Report
WTI/EFW HOLDINGS
WHEELABRATOR HAREWOOD WASTE-TO-ENERGY FACILITY
(THE PROPOSED DEVELOPMENT)

The comments in this response to the Scoping Report have been produced by Barton Stacey Parish Council and is based on local knowledge.

INTRODUCTION AND BACKGROUND INFORMATION

The proposed development is situated alongside the A303 with 2 villages, Longparish 1 km to the north and Barton Stacey some 1.8kms to the south, and approximately 9 km from the National grid. The two villages have conservation areas together with many listed buildings, the Rivers Dever and Test flow through the parishes. There are four SSSIs in close proximity (between 0.8 km to 1.7 km) and the second largest area of Ancient Forest, Harewood Forest, 3.4 km. The civil parish of Barton Stacey includes the village of Barton Stacey, and the hamlets of Bransbury, Newton Stacey, Cocom, and Drayton. The estimated population in 2016 was 1,034. The closest town is Andover 11 km to the west, with Winchester 13 km to the south.

Highways England described the A303 in its A303 Stonehenge to Berwick Preliminary EIA (February 2018) as follows “.... the A303 is a strategic route to the South West. Enhancing the corridor will deliver region-wide economic benefits by improving regional connectivity, facilitate planned growth in housing and jobs, and by improving the perceptions of tourists who use the A303 to travel to the region.” Highways England is proposing to spend £1.6BN on improving the Stonehenge section of the A303, a UNESCO World Heritage site, which is only 35.4kms (21 miles) from the proposed site. Moreover the proposed site is only 14.48kms (9 miles) from the junction of the A303 and M3, the sheer size of the proposed development will mean that it will be visible to tourists travelling west along this gateway to the South West for many miles. Hampshire’s Mineral and Waste Policy (paragraph 5.45) states that design of mineral and waste developments should be appropriate in scale and character in relation to its location, the surrounding area and any stated objectives for the future of the area. The site is comparatively small ruling out a horizontal building and the location of the aquifer will restrict drilling down so it is difficult to see how the plant could be reduced significantly in height to reduce the visual impact.

At present the route from the A303 to the Barton Stacey junction and beyond to the A3057 is rural in character with good quality farmland bordering each side along much of this stretch. This farmland surrounds the site with active farming within 300 metres of the site (on the southern side of the A303) as well as immediately to the north of this site. The current Enviropark is, on the whole, well landscaped, and shielded from the road by trees and bund walls although during winter months there is some light pollution. The height of current works on the adjacent site to the proposed development allow for effective landscaping which would not be the case with a 55 metre high main building with 2 flues of a height between 90-100 metres.

The site proposed for the development is within The Test Valley which has some of the nation's finest chalk streams and rivers passing through it. Although barely 30 miles in length, the Test is a nationally famous trout stream. If the quality of the fishing is not quite what it was, that is because of the declining water level, the result of ever-increasing abstraction and a recent shortage of the rainfall which is needed to fill up the chalk aquifers. The North Wessex Downs Area of Outstanding Natural Beauty is just over 3 km to the north of this site and the South Downs National Park is only 11 km to the south. There is much small scale tourism in the immediate area providing employment in the area based around countryside activities with the added attraction of tranquillity all within 2km of the national road network.

It is accepted that the UK Government has a need to reduce greenhouse gas emissions (principally CO₂), address the security of the national electricity supply and reduce residual waste. It is also accepted that, while Hampshire has no need of a further facility to incinerate waste and a plant of this nature is not part of HCC's Strategic Plan, there is a national requirement to support this policy. Again, on first sight, this proposal appears to qualify on some aspects of both government policy and Hampshire's Mineral and Waste Plan (adopted in 2013 and recently reviewed in 2018). However there are many aspects that appear to conflict with policy and need to be investigated and addressed when producing the Environmental Impact Report. The EIA Scoping Report (1.1.4) states that the proposed development will be capable of producing low carbon electricity however, whilst Wheelabrator have identified 1 million tonnes of waste in the "region" it was unable to confirm the composition of the waste and it is a known fact that high plastic content is efficient in producing energy but it produces high levels of carbon. The waste identified is not in close proximity to this site and will need to be transported to the site by HGV. Wheelabrator have suggested that travel time will be up to 2 hours.

Hampshire Mineral and Waste Policy supports the reduction of waste at the top of the hierarchy but accepts that where this is not possible other solutions need to be adopted. However it prefers plants that can provide combined heat and power (5.48). The heat produced from this development will not be able to be used at the present time as there are no users located near the site. Paragraph 5.48 states that the design should allow for excess heat to be used within a local heating scheme. Paragraph 6.192 states that a major waste facility should be situated close to the strategic network system to minimise the effect of traffic. However the high volume of traffic movements along this stretch of the network, together with poor access on A303/A34 and a poor traffic accident history means that network traffic diverts to local roads which are, in many places, single track. This is a co-located site (5.52) and it might be possible to recycle all the bottom ash at the Raymond Brown site although this is by no means certain at this stage. Although Raymond Brown is not operating at full capacity at the present time it has been unable to find markets for all the aggregate produced and so large unsightly piles have been seen over the last few months. If Raymond Brown is unable to take the bottom ash it will need to be transported elsewhere further increasing traffic entering the road network from this site (5.45). The Hampshire Policy encourages such sites to consider rail and water as a means of transport.

The electricity generated, estimated to be sufficient to supply 110,000 dwellings, will need to be connected to the National Grid by way of either unsightly pylons or underground cables.

Underground cabling creates a micro climate as the temperature of the land increases; this has a detrimental effect on wildlife and agriculture.

The life of the plant is stated to be around 50 years but Wheelabrator have been unable to address how the decommissioning of the plant will be managed, Barton Stacey Parish Council would like this to be dealt with in the EIS as this is a requirement of the Hampshire Mineral and Waste Plan (5.45).

It is understood that Wheelabrator considered 40 sites. This site was selected because of the proximity to the national road network and Raymond Brown. However as stated above the energy produced will need to be connected to the national grid (electricity) a distance of some 9 km and there is no market for the heat produced reducing the operating efficiency of the plant to around 30%. There are no other transport links to this site. It is not known if any of the sites had rail and/or water transport links as this question has not been answered.

Wheelabrator have 3 other sites in the UK:

Ferrybridge, Yorkshire, has one multi-fuel to energy power station with a 2nd under construction. These are situated on a site which previously housed three coal fired power stations; the last remaining station was decommissioned in 2016. When both units are in full production they will produce power for 149,650 homes. The waste derived-fuel, waste wood and biomass come from across Yorkshire and the region. Coal was delivered to the site by rail, barge and road; rail links are still excellent as Ferrybridge is situated on a site with rail network junctions, including northward to York, south to Pontefract (and Rotherham), west to both Wakefield and Leeds, east to Goole and south-east to the East Coast Main Line; the River Aire meets the Aire and Calder navigation close to the east of the town.

The development at **Kemsley** is situated within the urban part of Sittingbourne but adjacent to the 2nd largest recovered fibre based paper mill in Europe which will take the electricity and heat produced and reduce the use of coal generated energy. K3 is currently under production and will produce 50MW gross energy from 550,000 tons of waste; a second Wheelabrator is planned on this site and will generate 42 gross MW. There are both rail and road links. It is interesting to note that at the informal exhibitions held by Wheelabrator they quoted that Wheelabrator Harewood would produce 51MW gross energy from 450,000 tons of waste.

The 3rd site is **Parc Adfer** on the Deeside Industrial Estate, Flintshire. This site has the highest concentration of manufacturing jobs in the UK. Only 220,000 tons of non-recyclable waste will be processed at this site providing energy for 30,000 homes, the steam will be used to heat local industry and housing. There are ambitious plans to provide a new rail station and train links to this industrial park.

Only the proposed Wheelabrator Harewood is located in a rural area; only the Wheelabrator Harewood will be unable to use the heat generated.

7.2 Traffic and Transport

Traffic assessment introduction: the scoping of transport must include the A34 as well as the A303 and be carried out on Fridays and Saturdays during peak holiday times, especially through late July and August.

As stated in the introduction to this document the proposed development is just north of the A303 and a short distance from the A303/A34 spur road. 2017 traffic statistics produced by the Department of Transport state that Hampshire roads are the most used in the country with 9.9 billion vehicle miles travelled. The Department of Transport measured Annual Average Daily Flow (AADF) for the stretch of road from the A303 spur to the A3057 was 49,898 in 2017 of which 3,640 were HGV. The proposed development will increase the HGV daily movements by approximately 10%, 280 from the proposed site in the waste to energy cycle plus additional traffic from the Raymond Brown site as the production of aggregates will increase.

As can be seen from the attached documents (see Appendix “Major Accidents”) taken from a map of traffic accidents produced by Thames Valley Police and Hampshire Police. This is an accident-prone section of the A303. Accidents have steadily increased over the last 5 years at the Bullington Cross Interchange while production at Raymond Brown and Bryan Hirst has increased; it is estimated by the DoT that the average AADF from the A303 junction at Barton Stacey to the A303/A34 spur from 2000 to 2017 is in the region of 10,000. These accidents, together with other incidents such as lorries overturning, result in all types of traffic diverting through both the villages of Barton Stacey and Longparish. Access to Barton Stacey from the A303 is by means of a narrow road, single track in parts, which winds its way through the village towards the A30. The villages become congested and dangerous at such times.

The slip roads off the A303, easterly and westerly, are short by modern standards and vehicles often misjudge the distance and, being unable to reduce speed quickly enough, hit the barriers and signs.

A freedom of information request made by the Basingstoke Gazette (published 31st May 2017) to Highways England, Transport for Scotland and the Welsh department for Transport revealed the A303 was the most dangerous and prolific for animal deaths in 2016 and 2017. 11% of Britain's animal roadkill occurred along the Basingstoke to Devon road (434 animal deaths). Many of these resulted in temporary road closures and road traffic accidents. It also reinforces the rural nature of the countryside along this road.

Introduction to major Accidents and Disasters: must be scoped in.

Wheelabrator has suggested that there is no need to consider these in its EIA report because, although admitting that spontaneous combustion can occur, there will be sufficient controls in place to reduce the effects of any accidents or disasters to a level which is insignificant.

However, this area was subjected a major disaster when the flagship Ocado robotic warehouse at Andover, which was at the forefront of warehouse technology, was destroyed by fire which started at 2.44 pm on the 5th February 2019. The blaze lasted for 4 days. Some 20 fire engines

and 200 firemen attended the fire; properties, both domestic and industrial, within a 500-metre exclusion zone and a 1.6km stretch based on wind direction were evacuated on the 6th February with many families spending the night at a local community centre. The noise, heat, smell and light that emanated from the fire was both frightening and dangerous. There was also the danger of explosion from the materials stored on the site. There was considerable traffic congestion both locally and on the A303, which had miles of stationary traffic on the first day of the fire. Much of this traffic diverted through the villages of Longparish and Barton Stacey creating further danger and congestion. The cause is not yet known but the technology used in the plant was cutting edge and has been sold around the world.

Should there be a major incident at the proposed site blocking the A303 emergency vehicles, fire service, police and ambulances would have to access the site through Barton Stacey and Longparish. However, this route would be congested with diverting traffic.

7.2.6. In addition to Manual Classified Counts (MCC) at the sites mentioned, it is essential to carry out a count at the junction of the A303 and A34 (known as Bullington Cross). This is notorious locally for accidents, delays and congestion. It should also include Junction 8 of the M3. SCOPE IN.

7.2.7. The MCC undertaken for just 24 hours in June is considered inadequate. Counts need to be taken at peak times, most notably in July and August when holiday traffic on the A303 is at its height. Counts also need to consider local events such as Thruxton motor-racing circuit or when Forest Edge Kart Club is operating. SCOPE IN.

7.2.11 Main transport impacts are likely to be felt some distance from the site due to increase in number of trucks at pinch-points such as Bullington Cross (see above) as well as the slip-roads off the A303. Traffic delays at Stonehenge (a World Heritage Site) approximately at 36km distance are frequent particularly during the peak tourist season. SCOPE IN.

Locally on The Street.

7.2.18 The expected significant increase in the number of HGV movements on The Street is likely to cause stress, anxiety and fear among drivers of cars, and riders of motorbikes and pedal cycles. The road between Barton Stacey and Longparish is a country lane with passing spaces. It is the only pedestrian link between the two villages. It is regularly used by walkers, particularly in the summer months. The loss of this access as the result of large numbers of lorries entering and leaving the site will permanently separate Barton Stacey and Long Parish and seriously impact the pedestrian amenity that is currently enjoyed and would create community severance between the two which currently does not exist. SCOPE IN.

In addition, the only pedestrian access to Barton Stacey for residents of Drayton Park (the chalets behind the service station) is via the south side of the bridge over the A303 and past the slip-road. There is therefore potential for negative impact on pedestrian amenity as well as fear and intimidation of those pedestrians walking into Barton Stacey. SCOPE IN.

Many residents have observed that HGVs travelling to the Raymond Brown (RB) site do not fully stop at the T-junction at the junction of The Street and the slip-road from westbound carriageway of the A303. HGV often appear to think that any approaching southbound traffic heading towards them over the bridge will be turning left rather than heading straight on into Barton Stacey, even if they are not signalling to that effect. HGVs also slalom out of the RB site crossing The Street at unnecessarily high speed, cutting off corners in order to gain the eastbound slip-road of the A303. These are significant road safety issues. HGV driver behaviour is often intimidating even with the current level of vehicle movements. **SCOPE IN.**

Private schools and State Schools have pick up and drop off points in Barton Stacey on weekday mornings and afternoons during term time. Child safety is important and this group needs to be considered. **SCOPE IN.**

Other comments relating to Traffic and Transport

Accidents and delays are commonplace on the main roads in the area – A303/A34/M3. When this happens, roads through local villages are turned into rat runs. Approaches and access to the incinerator site must therefore be permitted only via the major arteries mentioned and incinerator site traffic must not be allowed to pass through villages such as Barton Stacey, Longparish or Bullington except on the express instructions of the emergency services.

SCOPE IN.

The MOD Area 2 opposite the proposed site is used regularly by MOD vehicles, often in convoy, and MOD personnel. There is a potential for congestion. **SCOPE IN.**

Attempts have been made to calculate the number of vehicle movements in and out if the site when the it is fully operational. This will involve trucks hauling in-bound waste/fuel as well as chemicals and other consumable products. Trucks leaving the site will either be empty or carrying treated IBA over and above the quantities currently being handled by RB as well as fly ash and waste water.

While it is tempting to think that lorries can arrive at predictable intervals and equally spaced, this will not be the case in practice. If vehicle arrivals/departures are concentrated into a relatively short working day, the potential for congestion is great. A queueing model should be generated to calculate queue lengths waiting times at, for example, the discharge bays.

SCOPE IN.

7.2.5 There is a proposed PRoW adjacent to the site (Hampshire County Council ref DMMO Barton Stacey 602). See appended photo “Proposed PRoW” including description of route along with resulting benefits to pedestrian connectivity between Longparish and Barton Stacey. See also appended photo of Barton Stacey map showing extent of PRoW’s locally.

7.3 Air Quality

7.3.1 The existing air quality in the vicinity of the site is said to be good. With the predicted number of extra movements by diesel vehicles this is likely to change significantly. The four main pollutant emissions from diesel engines are carbon monoxide, hydrocarbons, particulate matter and nitrogen oxides. Measurements of these and all other pollutants should take place not only on the road network itself but at sensitive areas such as schools, play areas, rivers and SSSI's. SCOPE IN.

7.3.8 Though measures and good practice will be in place to control odour emissions, subject to atmospheric conditions odours can travel long distances. The South East of England can be affected by the spreading of pig-slurry in Belgium while more locally odours from a local mushroom farm several kilometres away and other agricultural smells can permeate villages such as Barton Stacey, Chilbolton and Stockbridge. Odour emissions and dispersion. SCOPE IN.

7.3.10 There is potential for a cumulative impact on waterways as rivers such as the Dever and Test converge/merge further downstream about 3.75km south-west of the prosed site near to the southern end of Bransbury Common. SCOPE IN.

7.10 Landscape and Visual Impact Assessment / Appendix B

Landscape and Visual baseline Conditions

It should be noted that a planning application (13/00800/FULLN) for the proposed Bullington Cross Wind Farm Site some 3-4km from the proposed development site was refused due to the impact on a nationally important landscape (AONB and National Park). It was felt that the wind farm proposal would not conserve or enhance the particular qualities of these areas. It was rejected also for reasons of adverse impact on local heritage and, significantly, effect on low-flying military aircraft and their radar.

B6 Due to its height and mass, the proposed incinerator has the potential to be one of the largest structures in the south of England. Some estimates indicate that the footprint would be twice that of Winchester Cathedral while the chimney height would fall only three metres short of the spire of Salisbury Cathedral.

The uncompromising slab-sided design contributes to the potentially overbearing mass of the structure which would be sited in predominantly open rolling chalk downland situated a few kilometres from the South Downs National Park and from the North Wessex Downs Area of Outstanding Natural Beauty. Mitigation measures need to be investigated. SCOPE IN.

B44 & B49: It is recognised in the Scoping Report that a large number of photographs intended to show the visual impact of the incinerator were taken when all vegetation was in full leaf.

Most of the trees are deciduous so the visual impact of the structure will be far greater during the winter months. It is essential therefore that photographs be taken in winter and an image of the building be superimposed with the aid of a visualisation tool to give a clearer idea of the potential visibility. Alternative Seasonal photography required. **SCOPE IN.**

While photographs have been taken from a large number of points, including from almost 30km away, the greatest visual impact will be from those closest to the site, for example viewpoint numbers 1-13. In order to understand fully the most striking visual impact, winter photographs must be taken from the following additional viewpoints in Barton Stacey: (a) from the trig point on Newton Lane (b) from the Trim Trail area (c) from the playground of Barton Stacey Primary School (d) from the northernmost end of Roberts Road.

See appended photographs View 1 and view 2 as examples of viewpoints which will altered. Additional photographs taken from alternative viewpoints are contained within **Appendix A.**

WATER & ECOLOGY

Generally early conclusions drawn appear to limit the extent of further investigations. For example, considering the far-reaching nature of airborne particulate discharge the areas under assessment should be extended. The potential for these to build up in the river valley systems of the Test, Dever and Bourne, which all converge at Stockbridge, require rigorous further investigation. **SCOPE IN.**

There may also be other water courses in the locality such as a Winterbourne originating from the site (now culverted under the A303) that have been overlooked and need to be included. **SCOPE IN.**

Furthermore, with the nearest urban area being Andover at 11Km away, there is likely to be further disruption resulting from the subsequent linking this facility to the National Grid. Another increase in massing and alteration, over and above the existing proposals, will make further changes to the existing rural character of the location. Currently ‘technically’ not under consideration owing to it being dealt with by a separate application however provides additional need for an expansion of areas under study from the scoping report.

It is essential that this is factored in and considered as part of this application along with its potential to disrupt local wildlife and other sensitive receptors. **SCOPE IN.**

2.1.4 The entirety of the site lies within Flood Zone 1 and which is classified as low risk of flooding (less than a 1 in a 1000 annual probability). A characteristic of our local chalklands is underground springs which emerge after periods of heavy rain causing flooding. See appended photographs Flooding 1-10 in 2014. Springs rise near and, it is believed, from under the site of the proposed incinerator (see appended photos A and B). There is therefore a risk of contamination leaching from the site and polluting watercourses exacerbating any contamination by sewage from the local pumping station.

See also additional appended photographs of Drayton Meadow and groundwater rising February 1990, further evidence of the need to fully consider all risks associated with construction on the proposed site to groundwater and springs. SCOPE IN.

Southern Water has developed a strategy and action plan to manage the groundwater infiltration affecting the St. Mary Bourne catchment area. Barton Stacey forms part of this plan.

3.7.7 mentions a water filled quench pit – this suggests a danger of underground water aquifer contamination from storage tanks and also from surface water run off contamination. These need to be include. SCOPE IN.

Should a transferral of the bottom ash (**3.7.7**) by-product be required, this will result in further increase in traffic movements – these should be considered in the initial assessments. This activity needs clarification from the outset and needs to be scoped in for traffic assessment and other potential polluting risks. It affects traffic movements and the further movement of a by-product opens up the possibility of contamination of the local water courses as a result. SCOPE IN.

3.7.9 “No process effluent water will be discharged from the Site as it will be recycled within the plant.” Water usage is a local concern. How much will be used? Where will it be taken from and how is it discharged afterwards and will this have further effects on the underground aquifers or the rivers Test and Dever? SCOPE IN.

3.8.3 Discusses decommissioning methods at the end of the useful life of this facility. What are the likely contamination levels at this stage and what are they likely to be? This needs to be scoped into the initial assessments covering all aspects related to local water courses. SCOPE IN.

7.7.8 “Groundwater flow is anticipated to be to the west south-west toward the confluence of the River Dever and the River Test. Groundwater flow contours developed in the Environment Agency Test and Itchen Study (Entec, 2005 (Ref. 48) and Amec, 2013 (Ref. 49)) indicate groundwater from the Site may discharge to the River Dever and Test in the Bransbury area. Regionally, groundwater flows to the south west discharge to the River Test.” The Rivers Test and Dever merge south of Bransbury Common near the village of Wherwell about 3.75km from the site. The potential effects at this location downstream and also the airborne particulate build-up effects upstream need to be thoroughly interrogated. SCOPE IN.

7.7.13 references previous investigations. Since ground water levels vary from year to year and there has been significant recent flooding locally this requires further investigation. SCOPE IN.

7.8.4 states “the main and most sensitive receptor is considered to be the underlying principal aquifer, for which a clear and direct pathway exists” – the potential for contaminants reaching these two watercourses (Test and Dever) is evident and requires thorough examination, both from immediate underground water aquifer contamination, surface water run off

contamination and also from airborne particulate contaminants building up over time reaching these watercourses.

SCOPE IN.

Despite the current usage being determined as providing low risk there has been the detection of contaminants on site. Suggest further investigation since the scale of the proposed would surely increase these risks. SCOPE IN.

P.92 table 10 -1 – suggests limiting water investigations studies. Considering proximity to two rivers this needs to be extended. SCOPE IN.

Table 10-1 suggest ‘scoping out’ of effects upon “isolated reservoirs around the site” (p.92) however is there a risk from airborne particulate discharge here and further afield? Due to proximity of Test and Dever these should not be ruled out at this stage. Other groups omitted which also require consideration. SCOPE IN.

- Bees - the impact upon Bee populations.
- Dormice.
- Ground nesting birds.

Vermin - there is no mention of these or the subsequent impact on existing wildlife which may result from their increased population as a result of waste transferal to the site.

Archaeological and Cultural Heritage – 7.9 and Aviation 8.0

Early conclusions from the scoping report appear to limit the extent of perceived impact upon the village of Barton Stacey. These areas are inadequate to cover locally significant Archaeology and Cultural Heritage. Wider areas should be studied on account of the size and scale of the development, the massing proposed and that the effects of the proposals are farther reaching than the areas proposed within the scoping document.

The current scope does not take into account the changes to the general ‘rural character’ of the wider area and surrounding villages or propose any remedial measures as a result of the limited scope of currently suggested investigations. For example, the water aquifers are considered at 500m (7.8.2) and for archaeological sites at circa 1Km (7.9.2). Extend radius for studies. SCOPE IN.

7.9.1/2 - Archaeology, Cultural Heritage and Tourism

The areas of investigation to be extended to include all of Barton Stacey and Bransbury and to include sites such as Bransbury Common and the Barton Stacey church and the Conservation Area. SCOPE IN.

A definition of ZTV (Zone of Theoretical Visibility) (7.9.11) as applied to the site requires clarification. With Stacks as high as 100M the areas surrounding to be affected are wide ranging and therefore the area of study should be enlarged from the proposed 15Km (7.10.13). SCOPE IN.

7.12.5 states - “It is estimated that during the peak construction phase up to 1,000 personnel will be working on the Site.” Full consideration of the associated impacts of this large number of personnel will have on the local residents. E.g. traffic, local services, water provision, parking etc. The current population of Barton Stacey is 1034 (2016 census) and the scale of proposed development will have a large impact upon the area as a result. SCOPE IN.

7.12.7 - states “There is no large-scale tourism infrastructure around the Site that will be impacted by the Proposed Development. The views of the Proposed Development from the closest tourism sites (e.g. the North Wessex Downs AONB and South Downs National Park) are unlikely to affect tourism revenues given the distances (3.5 km and 11 km respectively). Hence tourism has been scoped out of the study.”

Tourism and local business: given the rural nature of the proposed site, the proximity of 4 SSSIs, ancient woodland, agriculture and countryside activities which support tourism and local business this must be scoped in and the scoping area for tourism and local business should cover a large radius as so many of the tourist attractions are interdependent on each other with the region and such a large structure will be seen from so many beautiful areas of the Test Valley and neighbouring areas. The scoping area should extend to cover a radius of 20 -30 km.

The proposed development will be visible from many large tourist attractions in the area given its height especially with the steam emitting from the flues. These include Winchester, Andover and the North Wessex AONB and the South Downs National Park. In TVBC as a whole tourism provides 4,500 jobs, generates £195 million per annum and the area is visited by 2.9million tourists. Within 2km of the proposed development many small business catering to tourists can be found providing much needed rural employment. Much of this is connected to fly fishing and shooting, individual and corporate entertaining with tranquil fishing at Dever Springs, Bransbury Mill in Barton Stacey and on the Portway and Middleton Estate at Longparish. Organised rough and driven game shoots take place on Portway and Middleton Estate land in Barton Stacey and Longparish. There is a Kart Club and Owls Lodge Shooting School adjacent to the site. Individual and groups of ramblers and cyclists enjoy the network of footpaths, rights of way and bridleways across the area. Whitchurch, 11 km to the northeast, also has a Silk Mill, Gin Distillery and is considered the Gateway to the North Wessex AONB.

There is a family kennel business located within 500 metres of the proposed development site which was established in 1980 and Riverside Lifestyle, at Bransbury, is within 1.8 km. Riverside Cottage offers self-catering holidays, retreats and a wellbeing experience. From time to time it erects a yurt and has corporate entertaining, wedding receptions and parties in addition to various courses and classes which are held also held in the studio. Agriculture is a major industry across both sides of the A303 bordering the proposed development site, both arable and sheep farming and add much to the character of the area and help attract tourists.

The above activities and businesses together with others in the area will be negatively affected by the visual impact, increased HGV traffic, noise, and increased pollution from the proposed site and jobs may be lost. It is noted in the scoping report that 50 specialist jobs will be created however very few are likely to be of use to local people whose livelihood and skills are in tourism and rural industries. Loss of employment and tourists will also affect local village shops and pubs.

Test Valley is a recognised tourist destination :
<https://www.testvalley.gov.uk/communityandleisure/tourism>

Tourist activity: **SCOPE IN.**

Other affected groups include the equine community which is a large active group locally. There are mounting blocks at either side of the bridge over the A303. This group needs to be considered. Widening the radius for study of impacts upon PROW's would bring into play several bridleways and other footpaths which have direct visibility to the site and are thus affected. The following groups require attention. **SCOPE IN.**

- The Owls Lodge Shooting School.
- Dever Springs Trout Fishery – this fishing lake is well used all year round and should fall within all study areas. This group draws in fishermen nationally.
- The Swan (Barton Stacey Village Pub) draws in visitors.
- Riverside Cottage Bransbury.
- Difford Kennels.
- Forest Edge Karting.
- Bees – There are many Bee keepers locally. Any potential change to their natural environment requires attention.
- Test Way footpath.
- Cyclists.
- Equine community.
- The Ramblers' Association.
- University of the Third Age.

7.12.6 North Hampshire is not an area of high unemployment. The recruitment of up to 50 operational workers with the right blend of skills may have an impact on other employers in the area. **SCOPE IN.**

Aviation: (8.2)

The MOD Training Area 2 is located immediately adjacent to the west of the proposed site and is regularly used by military aircraft (helicopters) from Middle Wallop (Army Air Corps) and RAF Odiham and RAF Benson. Therefore it is considered essential that Aviation is not scoped out of the EIA. The MOD Defence Infrastructure Organisation (DIO) should be consulted. **SCOPE IN.**

Summary of Scoping In requirements:

Receptor Topic	ACTIVITY/ISSUE	SCOPE IN	COMMENT
Traffic and transport	Public rights of way	Yes	The area suggested does not take into account a wide enough search area. Including proposed route.
Traffic and transport	Major accidents and disasters	Yes	A303 is an already congested dangerous highway.
Traffic and transport	Traffic	Yes	Increase and widen traffic counts (MCC) including more varied timings of counts
Traffic and transport	Traffic and access	Yes	Site access from A303 & Bullington Cross intersection
Traffic and transport	Traffic and access	Yes	Limited access locally on other roads
Traffic and transport	School busses	Yes	Consider School bus pick points.
Traffic and transport	MOD	Yes	MOD traffic movements
Ecology	Underground Aquifer	Yes	Fully interrogate the potential for underground water sources to be contaminated
Ecology	Water filled quench Pit	Yes	Fully interrogate the potential for underground water sources to be contaminated
Ecology	Water usage	Yes	EIA needs to fully detail where water used on site is taken from and detail any dangers to this source along with disposal of used water.
Ecology	Surface water run off	Yes	Dangers posed to Rivers Test and Dever to be fully investigated.
Ecology	Aquifer	Yes	Seasonal changes in aquifer water levels.
Ecology	Rivers Dever & Test	Yes	Proximity of both to the proposed site. Increase the area radius for studies.
Ecology	Isolated reservoirs around the site	Yes	Early conclusion drawn that these are not at risk. Widen area radius due to sensitivity of water courses locally.
Air Quality	All Sensitive receptors	Yes	Cover all Sensitive receptors.
Air Quality	Odour and emissions	Yes	Effects on local populations.
Air Quality	Airborne Particulate build up	Yes	Effects on rivers including 'fall out' upstream.
Heritage	Archaeology	Yes	Widen area radius for study to include all of Barton Stacey.
Visual impact	ZTV	Yes	Are to be extended from 15Km due to size and quantum of proposals.
Visual impact	Visual impact	Yes	Fully consider up to 30Km due to size of proposal.
Visual impact	Visual impact	Yes	Slab design impact upon rural character of area.
Visual impact	Visual impact	Yes	More seasonal analysis of impact.
Ecology	Rivers	Yes	Rivers Test and Dever - proximity

Ecology	Aquifers	Yes	Fully consider impact on aquifers and other surface water reservoirs.
Visual impact, Ecology	Connections to National Grid	Yes	Currently not part of application remit. Needs to be included.
Flooding	Flooding	Yes	Fully consider surface water effects and locally occurring springs on ground water levels.
Ecology, Transport	Bottom Ash transferral	Yes	Traffic assessment impacts and potential risks of contamination along with visual impact of storage.
Ecology	Decommissioning	Yes	End of life for facility risks
Transport, noise,	Construction phase	Yes	Broaden scope of study to address issue of extra people in the area and strain on local infrastructure.
Tourism	Tourism	Yes	Include within studies.
Transport, heritage, Tourism	Public Rights of Way	Yes	Not all local PRoW's appear to be considered in scoping report. Increase area radius to cover these.
Tourism	Owls lodge	Yes	Include within studies.
Tourism, local business	Forest Edge Kart Club, Difford Kennels, Dever springs, The Swan, Riverside cottage		Include within studies
Tourism, Ecology	Fishing and shooting tourism	Yes	Include within studies.
Tourism	Cycling and walking tourism	Yes	Include within studies
Ecology, tourism	Bees	Yes	Include within studies.
Tourism	Ramblers Association, University of the Third Age	Yes	Include within studies.
Ecology	Dormice	Yes	Include within studies.
Ecology	Ground nesting Birds	Yes	Include within studies.
Visual, Ecology, air quality – as sensitive receptor	Potential effects on BS CoE School & Pre School	Yes	Include within studies.
Aviation	Aviation	Yes	Include within studies.
Air quality	Odour emissions and dispersion	Yes	Include within studies
Air quality	Air quality	Yes	Studies and projections to include not only road networks but also play areas, schools, rivers and SSSI's

Traffic and transport	Traffic and transport	Yes	Assess traffic delays at pinch-points such as Bullington Cross, Stonehenge, slip-roads off the A303, The Street
Traffic and transport	Pedestrian amenity	Yes	Include in studies
Traffic and transport	Fear and intimidation	Yes	Include within studies
Visual Impact	Visual Impact	Yes	Photographs to determine ZTV to be taken in winter and at four additional viewpoints in Barton Stacey

Appendix A - Photographs

View 1 – Standing on School Path facing north



View 2 – From the top of Postman's Walk facing north East



Flooding 1 – Taken (2014) from the south end of the Street with Barton Cottage in the background



Flooding 2 – (2014) Cocum Road at Cocum Farm



Flooding 3 – (2014) Overlooking Cocum Farm fields



Flooding 4 – (2014) water coming out of the Spring field into the gully along Cocum Road – rising groundwater and springs



Flooding 5 – (2014) Newton Lane – looking towards the church - by allotments



Flooding 6 – (2014) similar to above but a little further along Newton Lane



Flooding 7 - (2014) View to back of Kings Elms, Barton Stacey



Flooding 8 - (2014) View from Banyuls, Barton Stacey



Flooding 9 - (2014) – local village flooding, Bransbury



Flooding 10 - (2014) Bransbury Substation – nearly flooded in 2014



Springs rise near to the site of the proposed incinerator. These may actually originate from under the site.

"The springs in the Barton Stacey area, including those adjacent to the A303, seem to have caused flooding about every five or six years, averaged over the past decades that my family has farmed the land." Peter Read, Local Farmer.

Photo A & B show when the 'incinerator site' springs flooded the Sewage Works, with sewage then running into the River Dever – 2014.

Photo A



Photo B



Drayton meadow – (2000) north of A303 near to the site



Feb 1990 – ground water rising adjacent to A303 – near to the site



Feb 1990 – ground water rising – adjacent to A303 – near to the site



Extract from Barton Stacey Map – showing extent of PRow's locally.



Proposed Public Right of Way - Hampshire County Council ref DMMO Barton Stacey 602

DMMO Barton Stacey 602
Countryside Service, Hampshire County Council, Castle Avenue, Winchester, SO23 8UL

1.3 Application Route utility

- a. The building of the A303 dual carriageway disrupted the RoW linkages between Longparish and Barton Stacey. For non-motorised modes of transport, bridges over the A303 represent the only safe means of crossing this busy road. This route will greatly improve the connectedness of the minor road and footpath/byway network by allowing walkers, cyclists and horse riders to move between the routes to the east of Longparish including Longparish 50, 49, and the routes around Barton Stacey such as Barton Stacey 19, via the Barton Stacey A 303 road bridge.
- b. The route therefore significantly enhances the connectivity of these current rights of way in line with the policy described in the Hampshire County Access Plan 2015-2025.
- c. This was also one of the routes recommended by the County Access Forum for improvement of the RoW network.



Figure 1. Extract of the HCC Definitive Map number 11.18 at scale of 1:10000 showing the application route between A and C in red and the potential diversion from B to X in green.

Source: Ordnance Survey. Crown Copyright. All rights reserved. Licence Number 100019180 2008

Major Accidents Map – A303/A34 – Thames Valley Police & Hampshire Police accident statistics from 01/01/2015 to 31/12/2017

Key:

Yellow Circle – Minor Accident, Blue Circle – Major Accident, Red Circle - Fatality



From: Rebecca Murray <Rebecca.Murray@basingstoke.gov.uk>
Sent: 22 March 2019 15:38
To: Environmental Services <environmentalservices@planninginspectorate.gov.uk>
Subject: RE: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility

Dear Mr White,

Thank you for your letter of consultation for our consideration of the above application. My sincere apologies for my delayed response.

Please find attached a copy of the Council's response with consultee responses provided within Appendix A and comments from Hurstbourne Parish Council within Appendix B.

If you have any questions regarding the attachment, please do not hesitate to contact me.

Kind regards,
Rebecca

Rebecca Murray
Senior Planning Officer
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From: Environmental Services <environmentalservices@planninginspectorate.gov.uk>
Sent: 25 February 2019 11:48
Subject: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility

19/00559/EN10

**** PLEASE NOTE: This message has originated from a source external to Basingstoke & Deane Borough Council, and has been scanned for viruses. Basingstoke and Deane Borough Council reserves the right to store and monitor e-mails ****

FAO Head of Planning

Dear Sir/Madam

Please see the attached correspondence regarding the proposed Wheelabrator Harewood Waste-to-Energy Facility.

Please note the deadline for the consultation is **25 March 2019**, which is a statutory deadline that cannot be extended.

Kind Regards

Richard White

EIA and Land Rights Advisor
Major Applications & Plans

The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN
Direct line: 0303 444 5593

Helpline: 0303 444 5000

Email: Richard.White@planninginspectorate.gov.uk

Web: infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: [@PINSgov](#)

This communication does not constitute legal advice.

Please view our [Information Charter](#) before sending information to the Planning Inspectorate.



Mr R White
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref: 19/00559/EN10
Your Ref: EN010104

22 March 2019

Dear Mr White,

Location: **Wheelabrator Harewood Waste-to-Energy Facility**
Proposal: **Application by WTI/EFW Holdings Limited (the Applicant) for an Order
granting Development Consent for the Wheelabrator Harewood Waste-
to-Energy Facility - Scoping consultation and notification**

Thank you for consulting Basingstoke and Deane Borough Council on the Environmental Impact Assessment (EIA) Scoping Opinion by WTI / EfW Holding Limited (the Applicant) relating to a future application seeking an Order granting Development Consent for the Wheelabrator Harewood Waste-to-Energy Facility.

Please accept my sincere apologies for the delay in responding. Basingstoke and Deane's response is provided below. Appendix A sets out the internal consultation responses received to date in full. Appendix B provides a full response from Hurstbourne Priors Parish Council.

The Proposal

Construction is anticipated to commence in 2022 and last approximately three and a half years. As the development is considered a national infrastructure project, PINS are the determining authority.

The proposed scheme as set out within Section 3 'Proposed Development Description' paragraphs 3.1.1, 3.1.2, 3.3.1 and 3.4.2 is for a waste to energy facility with a capacity of approximately 65MW gross output, capable of producing low carbon electricity and heat through waste derived fuels from various sources of processed MSW and commercial and industrial waste. The produced net power is intended to be exported to the national grid via an existing off-site substation near Andover. The facility will comprise of two combustion lines with a maximum combined capacity of 500,000 tonnes of fuel per annum with a flue / stack each (measuring between 90-100m in height), fuel reception and storage (maximum height of 45m), boiler house (maximum height of 55m), ash collection area, stack gas emission control equipment and flue gas treatment plan, above ground distillate storage tanks, administrative offices, air cooled condenser (maximum height of 40m) and substation and mains transformer.

Response

The site, although not located within the Basingstoke and Deane borough, will be visible from the borough due to its scale which has the potential to impact upon the boroughs designated and non-designated heritage assets and the local landscape character, including conservation areas. Due to the nature of the proposed development the development could also result in impacts upon the health of local residents and quality of life, as well as local ecology. Basingstoke and Deane therefore requests that the following items / issues are taken into account during the preparation and submission of the applicant's Environmental Statement (ES):

- Description of the proposal: details should be provided regarding how the facility will connect to the national grid and what works will be required to achieve this connection as there is potential for further visual impacts;
- Type and quantity of development: clear detail should be provided regarding where the waste will be sourced and the specific type of waste in order for the assessments of the residue and emissions during construction and operational phases and the transportation of the material to be comprehensive;
- Nature of the energy demand: an end user demand should be provided within the submission to satisfy the need for the facility in this location;
- Appraisal / assessment of the 40 alternative sites for the development which are referenced;
- Technologies used: alternative design and technology options should be provided to compare and justify the design and scale of the proposed facility with reference to the demand;
- Transport assessment: particularly in respect of the construction and operational phases, and in the event of accidents / emergencies. The type and amount of waste will also impact upon the type of vehicle required and the number of movements to transport the material to the site and this should be set out accordingly. Basingstoke and Deane defer to the advice provided by Hampshire County Council as to the specific contents of the assessments. Detailed routes proposed for traffic generation and any mitigation measures should be identified.
- Ecological assessment: I would place great weight upon comments provided by Natural England and Test Valley Borough Council's Biodiversity Officer's particularly with regard to any requests for supporting documents and information. Reference should be made to Sites of Importance for Nature Conservation (SINCs) which lie within close proximity to the proposed development area including the Test Valley Meadow and Tidbury Ringwood and to the two Sites of Special Scientific Interest (SSSIs) in close proximity to the site (River Test and East Aston Common);
- Air Quality: I would place great weight upon comments provided by the Environment Agency and Test Valley Borough Council's Environmental Health Officer's particularly with regard to any requests for supporting documents and information. With respect to the proposed NO₂ diffusion tube background monitoring required to inform the dispersion model that will be produced, the timescales involved prior to formal submission could be extended to increase the reliability of the data used in the modelling. Whilst Basingstoke and Deane do not have any data from an automatic AQ monitoring station, we have diffusion tube data

for Whitchurch that can be provided to the applicants appointed AQ consultants if needed. In addition, it is suggested that the start-up and end of day are included within the overall operational assessment periods;

- Impacts on the historic built environment: as a minimum, Basingstoke and Deane expect the following heritage assets to be considered within any future ES, which are within 5km of the development site:

- The Whitchurch Conservation Area;
- The Tufton Conservation Area;
- The Hurstbourne Priors Conservation Area;
- Hurstbourne Park (Grade II registered park and garden);
- Approx. 15-20 Listed Buildings, including 1 Grade I listed and 1 Grade II* listed buildings; and
- 7 Locally Listed Buildings at Tufton Warren Farm.

The site is considered to be visible from a much wider area than a 5km radius, therefore the impact of the proposals on other heritage assets outside of this 5km area will need to be assessed and appropriately considered (with the assessments being proportionate to the relative significance of the heritage assets). It is also not agreed that screening from existing trees will obscure views of the proposal given the scale and height of the building, stacks and plume. The ES should be extensive and include methodologies for assessing wider impacts to the setting and historic character of heritage assets lying at a greater distance from the proposal than those limited subset of examples currently cited. It is also suggest that the Applicant reviews this section of the report to reflect the heritage related policies as set out in Appendix A.

In respect of archaeology and cultural heritage the impacts as a result of changes to air quality and the local microclimate should be addressed and not dismissed. This should be reflected within this section of the ES;

- Aviation: the site is situated at the edge of a low flying area. Popham and Chilbolton Airfields, the MOD and the Flying Ambulance should be consulted and any requests for information fully considered within the ES;
- Landscape and Visual Impact Assessment: this area of landscaping is of a sensitive nature. Any future assessment should include reference to dark landscapes consideration of 24 hour lighting at the site. I raise concern with regard to the proposed approach to limit the search area from 30km to 15km due to the nature of the sensitive landscapes surrounding the site, the proposed height and scale of the development and of the plume during operation and maintenance, and the surrounding terrain. As a minimum, a 30km search area should be requested. In addition, reference should be made to the Basingstoke and Deane Landscape Character Assessment and to Lodge Farm (which is included on the Hampshire List of Historic Parks and Gardens);
- Cumulative impacts: any future ES should include consideration of the following allocated sites around Whitchurch as set out within the Basingstoke and Deane Local Plan 2011-2029 and the Whitchurch Neighbourhood Development Plan 2014-2029:

- South Bloswood Lane, Whitchurch (approximately 150 homes under construction) – Local Plan Policy SS3.6;
- Land between Winchester Road and Micheldever Road (approximately 100 homes) – Whitchurch Neighbourhood Plan Policy HA4;
- Land at Evingar Road (approximately 94 homes) - Whitchurch Neighbourhood

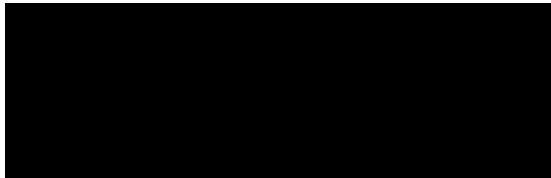
- Plan Policy HA2; and
- A number of smaller Neighbourhood Plan allocations and extant consents.

In addition, the promoted New Town at Apsley and Popham (set out within the Basingstoke and Deane SHELAA) should also be considered.

It is also suggested that any other documents or matters requested by statutory consultees are included.

If you have any queries or require further information, please do not hesitate to contact Rebecca Murray on 01256 845578 or email rebecca.murray@basingstoke.gov.uk.

Yours sincerely,



Planning and Development Manager

Appendix A – Consultee Responses

Policy Officer (12/03/2019)

Hi Rebecca

I have had a look through the proposed scope of the EIA.

In addition to the consultees you mentioned, I would suggest also consulting with Environmental Health given the proximity of the site to the borough and the direction of the prevailing wind. I am sure the technical consultees will be able to provide you more detailed advice about the scope of each of the chapters.

In terms of nearby development that will add further residents/sensitive receptors into the scope of some of the surveys, I would draw your attention to the sites allocated around Whitchurch through the Local Plan and the Whitchurch Neighbourhood Plan. These include South of Bloswood Lane, Whitchurch (approx. 150 homes, Policy SS3.6 - under construction), Land between Winchester Rd and Micheldever Road (Approx 100 homes, WNP Policy HA4), Land at Evingar Road (approx. 94 homes, WNP Policy HA2), and a number of smaller NP allocations and extant consents.

Regards
Matt

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Conservation Officer (11/03/2019)

Recommendation:

The approach to built heritage set out within the submitted Environmental Impact Assessment Scoping Report will be insufficient to enable the full impacts of the proposals on the historic built environment to be fully understood and assessed. A full chapter on the impacts of the proposals on the historic built environment will be needed within the subsequent Environmental Statement.

Key Issues:

1. Impact on the setting and/or significance of listed buildings
2. Impact on the setting and/or significance of conservation areas
3. Impact on the character or appearance of conservation areas
4. Impact on the setting and/or significance of a park or garden on the Register of Parks and Gardens
5. Impact on the setting and/or significance of non-designated heritage assets
6. Design

Relevant Legislation:

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on Local Planning Authorities to have special regard to the desirability of preserving a listed building, or its setting, or any features of special architectural or historic interest it possesses. Section 72 of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that with respect to any buildings or other land within a conservation area, in the exercise of relevant functions under the Planning Acts, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Policies

National Planning Policy Framework (February 2019) Section(s) 4, 12, and 16

National Planning Policy Guidance (2014, updated 2018)

Basingstoke and Deane Local Plan 2011-2029 Policies EM10 and EM11

Supplementary Planning Documents and Guidance

BDBC Design and Sustainability SPD (2018)

BDBC 'The Historic Environment: Listed Buildings' SPG (2003)

Whitchurch Conservation Area Appraisal (2004)

Tufton Conservation Area Appraisal (2004)

Hurstbourne Priors Conservation Area Appraisal (2004)

BDBC Draft Heritage SPD (to be adopted March 2019)

Other material documents

Historic England: Conservation Principles (2008)

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2nd ed. (2017)

Historic England: Advice Note 1: Conservation Area Designation and Management (2016)

Comments

This enquiry relates to a consultation from the Planning Inspectorate, for a development proposal for a Waste-to-Energy Incinerator, of a size and output which is classified as Nationally Significant Infrastructure.

The proposed development would include, inter-alia:-

- A boiler house of up to 55m in height above ground level
- A fuel store and reception of up to 45m in height above ground level
- An air cooled condenser of up to 40m in height above ground level
- A pair of chimney flues, of up to 100 metres in height (it is not clear if this would be from ground level, or from the top of another building)
- Associated works of infrastructure (which presumably would include ancillary buildings, means of enclosure, hardstanding and access arrangements)

Paragraph 7.9.14 of the submitted report implies that the proposed development would not be visible from any built heritage assets, due to intervening vegetation, and as a consequence, that built heritage should be scoped out of the Environmental Statement. This assessment is based on a brief assessment of the impact of the proposals on a 1km study area.

Given the scale (and in particular the height) of the development, this seems misleading, as chimney flues of up to 100m in height are thought to be significantly visible, within short and long views. Indeed, the submitted Zones of Theoretical Visibility (ZTV) plan indicates that the development will be visible from up to 20km away.

On this basis, it is considered that there is insufficient information presently available to support the applicant's assertion that the proposals would not result in a loss of significance of any heritage asset, and a full chapter on the impacts on the historic built environment will be needed within the Environmental Statement. It is suggested that the scale of this task would justify separate chapters for both archaeological and built heritage impacts.

As a minimum, the Environmental Statement will need to consider the following heritage assets within the BDBC Borough (whilst further heritage assets within the TVBC and WCC areas will also need to be included), which are within 5km of the development site:

- The Whitchurch Conservation Area
- The Tufton Conservation Area
- The Hurstbourne Priors Conservation Area
- Hurstbourne Park (Grade II registered park and garden)
- Approx. 15-20 Listed Buildings, including 1 Grade I listed and 1 Grade II* listed buildings
- 7 Locally Listed Buildings at Tufton Warren Farm

As illustrated by the ZTV plan, the site is thought to be visible from a much wider area than the initial 5km radius, therefore the impact of the proposals on other heritage assets outside of this area will need to be assessed. Clearly this approach will need to be proportionate to the relative significance of the heritage assets, with greater weight being given to those assets of greater significance, such as above ground scheduled monuments, and highly graded listed buildings.

Daniel Ayre Senior Conservation Officer
11.03.2019

Environmental Health Officer (18/03/2019)

Hi Rebecca,

Further to the above enquiry and having reviewed the submitted AECOM EIA scoping report (specifically Section 7.3 Air Quality and 7.5 Noise and Vibration) I have the following comments;

Noise and vibration – It is unlikely that noise from the operational and construction phases will adversely impact on residents in BDBC due to the large separation distances involved and the existing ambient noise sources between the development site and the Borough boundary, which is largely dominated by road traffic noise from the A303 and the A34. With respect to the proposed assessment methodology and criteria the scoping opinion adequately sets out how noise will be quantified and assessed against relevant statute, guidance and best practice;

Air quality - The proposed assessment methodology and assessment criteria are acceptable. Our only comment would be with respect to the proposed NO₂ diffusion tube background monitoring required to inform the dispersion model that will be produced. The proposal is to collect data for a period of 3 months, however given the timescales involved prior to formal submission there appears to be an opportunity to extend this period further to increase the reliability of the data used in the modelling. Whilst BDBC don't have any data from an automatic AQ monitoring station, we have diffusion tube data for Whitchurch that can be provided to the applicants appointed AQ consultants if needed.

Regards

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Landscape Officer (21/03/2019)

Hi Rebecca,

Having reviewed the EIA Scoping Report for the above proposed application, I would object to the proposal on landscape grounds at this stage.

The application site is situated outside this borough, in open countryside, to the south east of the rural village of Longparish. On rising land, the site is immediately north of the A303, and in close proximity to a network of footpaths running through the vicinity of the site, the A303 and A34, a SINC woodland and Lodge Farm, which is included on the Hampshire List of Historic Parks and Gardens. There are also 2 SSSIs within the wider locale of the site. It is therefore considered that this landscape is of a sensitive nature. The development proposed is of a significant size and scale, and would have adverse impacts on this landscape as well as that within Basingstoke and Deane Borough. Impacts would be significant, in relation to the character of the landscape and its visual amenity.

Referring to the proposed Landscape and Visual Assessment within the EIA Scoping Report, I would raise concerns about the proposed approach to limit the search area down from 30km radius down to 15km. Given the scale and height of the proposed development, I would advise that a 30km search area should be required, in order for the applicant to fully assess and demonstrate what the impacts would be.

If you have any queries please get back to me.

Kind regards,
Catherine

Catherine Daly
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Basingstoke
and Deane

THAMES
VALLEY
PROPERTY
AWARDS
2017
Town of the Year
WINNER

Appendix B – Hurstbourne Priors Parish Council Response

COMMENTS FOR BASINGSTOKE AND DEANE BOROUGH COUNCIL ON
WHEELABRATOR HAREWOOD: WASTE TO ENERGY FACILITY
OPINION AND OBSERVATION ON THE EIA SCOPING REPORT DATED FEBRUARY
2019 ON BEHALF OF HURSTBOURNE PRIORS PARISH COUNCIL

Introduction

1. Hurstbourne Priors Parish Council is not a direct consultee in respect of the EIA Scoping Report that has been drafted in connection with this anticipated application. However, we understand that BDBC have recently become a consultee given the proximity of the Borough to the anticipated site. It is on that basis that Hurstbourne Priors Parish Council have considered the EIA Scoping Report with a view to making a number of observations to BDBC that we would wish to see included in their formal response to the document.
2. Whilst there are general matters upon which we have made an observation, by definition the purpose of this document is to draw matters that are of particular concern to us as a Parish Council given that our Parish encompasses two conservation areas (Hurstbourne Priors and Tufton) that both fall within the marked area of ‘Known Environmental Considerations within 5 km’ shown in Figure 2-2 (page 17).

General observations

Paragraph 1.4 – The Need for the Proposed Development

3. The applicant has not identified the type of waste fuel or, importantly, the composition of the waste. In order to satisfy claims that the site is required to meet the requirements of the Government’s commitment to ‘the road to 2050’, it needs to be demonstrated that the waste/fuel to be consumed has derived from renewable carbon sources. Most plastics are derived from fossil carbon (oil). The applicant should be required to detail in their application details of the type and source of the waste materials; along with the calorific content of the same given that this has an impact upon the number of vehicle movements required to deliver the waste. Similarly, the applicant should highlight and identify whether this waste will be Refuse Derived Waste (RDW), untreated, hazardous or medical waste.

Paragraph 2.1 – Site Description

5. The location of the site as defined by the indicative red line in figure 2-1 (page 13) is too vague. The applicant has not provided a detailed scale drawing giving full measurements of the buildings, loading areas, vehicle parking and holding areas (see paragraph 10 below).

Paragraph 3.1 – The Proposed Development Description

6. Paragraph 3.1.2 states that the maximum capacity of the facility is 500,000 tonnes of fuel per annum. In the PINS meeting note (ref EN010104) the Applicant states capacity is estimated at 600,000 tonnes but in literature produced and distributed by them for the open days it states that the maximum capacity is 450,000 tonnes of fuel per annum. This is also repeated on the information pages of their website. Clarification and consistency is sought from the applicant.
7. Paragraph 3.1.3 makes it plain that a local heating demand is not yet available. In our view this is a fundamental omission from the application. The applicant should be required to demonstrate a realistic probability that a suitable heat customer can be secured and details of that customer ought to be provided in order to ensure that any planning application required in respect of that customer is considered as part of this process as opposed to being an after-thought. At present there does not appear to be any mitigation as to what happens to the heat being produced without this demand.
8. Additional clarification is required regarding the size of the particulate filters in line with current air quality guidelines and the proximity of sensitive water courses.
9. The applicant should be asked to supply further detail as to the decommissioning of the facility given that it will only have an operational life of 50 years (paragraph 3.1.4). As a minimum, and in accordance with the current planning conditions on the adjacent Raymond Brown site, the area ought to be returned to greenfield at the end of its lifespan.

Paragraph 3.3 – Facility Description

10. It is apparent that the applicant cannot yet confirm what the final dimensions of the facility will be on the basis that '*the final height will be determined through technical studies once specific emission parameters for the stack are confirmed*' (para 3.3.1). We find this staggering. The applicant is well versed in the technical data surrounding facilities of this nature and ought to be able to provide full and final dimensions ahead of the EIA being undertaken. A failure to do so could result in a great deal of the EIA being made redundant, particularly in respect of the visual impact of the site.
11. In any event it is apparent that the proposed facility will be vast, with the maximum height of the chimney stack '*likely to be between 90 to 100 m above ground level*'. There are no comparable buildings within the surrounding area, and certainly none along the A303. We do not believe that the applicant has given sufficient (if any) thought to the mass of the building when set against the landscape of the area, which is accepted by the applicant at paragraph

5.5.11 as being open countryside.

Paragraph 3.4 – Grid and utilities connections

12. Details must be given on where the water will be extracted and how much water will be used by the plant (para 3.4.1). All local water supply comes from boreholes supplying the mains and significant additional extraction will affect the underground water reserves. This will have a knock on effect on important local rivers and their ecosystems, affecting both environment and tourism (fishing/birdwatching).
13. The applicant must provide full details within the application for the proposed connection to the national grid (para 3.4.2) and this must be considered as part of the EIA. The applicants' representatives have given contradictory and unsatisfactory answers during local open days. Both pylons and underground cables will have a potential significant environmental and visual impact. Pylons are not present in this area of Hampshire and, if the connection is indeed at Andover, the route would also cross several SSSI's. It is vital that whichever connection is chosen it should be included within this application.

Paragraph 3.7 – Process Description

14. The current IBA site is at full capacity and in breach of its planning licence with regard to the height of stored IBA. In our view transport studies within the EIA should include removal of IBA from the site on the assumption that the neighbouring site is unable to take it, is at full capacity or is unable to reach an agreement regarding processing.

15. The EIA transport studies ought to also include the lorry movement associated with the removal of hazardous waste from the site (para 3.7.8).

Paragraph 3.8 – Indicative Programme

16. In our view the EIA and ES ought to consider the impact of the construction of the facility, and in particular with regard to pilings and other excavation work given that the applicant has accepted that the height of the water table is 8.6 – 9.4 bgl.

Paragraph 4 – Consideration of Alternatives

17. We do not accept the Applicant's assessment that the 'Do nothing scenario' is not appropriate (para 4.1.1). We believe that Schedule 4, para 3 of The Infrastructure Planning (EIA) Regulations 2017 negates the applicants claim that this scenario is not relevant.
18. Within the two sub-paragraphs headed 'Alternative Designs and Sites' the applicant does not appear to have given any consideration to any alternative design, for example horizontal boilers, lower building height, alternative technology etc. This is not in accordance with Schedule 4, para 2 of The Infrastructure Planning (EIA) Regulations 2017 specifically with regard to consideration of the environmental effects. The sensitive rural nature of this site should require that the initial criteria for the selection of alternative sites be detailed, and specifically why this rural site was selected over a brownfield site.

Paragraph 5.5 – The Development Plan

19. Given the proximity of this site to BDBC, in our view the Applicant ought to be obliged to have at least some regard to the BDBC Local Plan.
20. The Applicant seeks to rely upon the Foamix plant in support of its application (see

para 5.5.3). The Foamix plant only had planning permission for one year as a temporary installation granted in May 2012 (see TVBC planning application 12/01236/CMAN) and should not be used as an example within this Application.

21. The Applicant cites policy 24 at para 5.5.4. Policy 24 relates to Oil and Gas development not waste management.
22. At paragraph 5.5.5 the applicant has deliberately and inaccurately paraphrased Policy 25. Policy 25 in full states “The collocation of activities with existing operations will be supported, where appropriate, if commensurate with the operational life of the site, and where it would not result in intensification of uses that would cause unacceptable harm to the environment or communities in a local area (including access routes) or prolong any unacceptable impacts associates with the existing development. (*our emphasis*).

Particular observations on the scope of matters to be included within the EIA

7.2 - Traffic and Transport

23. We ask for the following:
 - a) That there be a Manual Classified Count (MCC) at the Bullington Cross interchange of the A34 with the A303 (both north and south);
 - b) That the MCC and Automatic Traffic Counts (ATC) that are to be used for the baseline vehicular counts should be undertaken for longer than 24 hours, in the case of the MCC, and longer than seven days in the case of the ATC;
 - c) Both the MCC and ATC that are to be used for the baseline counts ought to be undertaken during school summer holidays given the nature of the A303 as one of the main routes to the West Country;
 - d) That consideration be given to the impact of the widening of the A303 at Stonehenge upon future vehicular movements;
 - e) That accident data for the past five years for the A303 and A34 within a vicinity of 25 miles from the site should be obtained and analysed with a view to identifying the impact of the closure of either of those roads on the local road network;

- f) That the applicant does provide a comprehensive plan that clearly demonstrates how trucks will be kept away from all local roads other than the A303 and A34 in the event that either of those roads are closed;
- g) That the applicant provides details as to how congestion will be avoided on the surrounding public highways given that the capacity at the site for HGV's is limited.

7.3 – Air quality

24. We ask for the following:
- a) That odour impacts are included within the EIA and are not scoped out as intended (para 7.3.8). There have been previous reports of odour emissions from the adjacent waste sorting facility within the Parish, particularly during the prevailing south-westerly wind. We fail to see how this can be scoped out given the cumulative effect with the existing facility.

7.5 – Noise and vibration

25. We ask for the following:
- a) That the study area of the sensitive receptors be expanded beyond the proposed range of 1.5 km from the site. The basis for this request is that the noise from the nearby kart track and shooting school can clearly be heard within our Parish with the prevailing wind.

7.7 – Water resources

26. We ask for the following:
- a) That the applicant does provide full details as to the likely contamination risk to the groundwater during the construction process;
 - b) That the impact on the fishing tourism industries downstream from the site should be assessed. This may, for example, include the River Itchen which is an SAC.

7.9 – Archaeology and Cultural Heritage

27. We ask for the following:
- a) That the proposed study area of 1 km around the site be expanded so as to include, as a minimum, the entirety of Hurstbourne Priors Parish;
 - b) That the Applicant acknowledges that two additional conservation areas fall within the ZTV, namely Hurstbourne Priors and Tufton;

- c) That the impact upon built heritage is included within the EIA and not scoped out as proposed given that vegetation is not permanent and cannot provide adequate screening. The Applicant should consider, as a minimum, the impact of the proposed facility upon all of the listed properties within Hurstbourne Priors and Tufton (see Appendix 1);
- d) That the Applicant does assess the impact of the nitrite and phosphate emissions from the chimney stacks on the acidity of rain and the potential impact of that on thatched properties.

7.10 – Landscape and Visual Impact Assessment

- 28. We ask for the following:
 - a) That the ZTV for the final assessment should be a minimum of 15 km, and ideally 30 km, and that it ought to also consider the visibility of the steam plume in cold/cool weather conditions;
 - b) That Hurstbourne Priors Parish be included within the Landscape and Visual Impact Assessment (LVIA) as it has currently been excluded. We ask for this given that the applicant has already demonstrated that the site will be visible from the cricket pitch that is within the heart of the parish and conservation area (see photo from viewpoint 29);
 - c) That the LVIA includes an assessment of the visual impact from each of the significant viewpoints that are referred to within the Hurstbourne Priors conservation area (attached as Appendix 2 for ease);
 - d) That the LVIA also includes an assessment of the visual impact from the permissive footpath adjacent to the bus shelter on the eastbound B3400, footpath 13 and the footpath entrance by Drury Close;
 - e) That the LVIA is undertaken during both winter and summer months;
 - f) That the LVIA also considers the impact upon the landscape at night given the fact that the site is to be operated 24 hours a day and so will be lit. It will also be lit for aviation purposes (see para 8.2.1). Given that Hurstbourne Priors is within a dark skies area we ask for the impact of the site during night-time hours to be assessed.

7.12 – Socio-economics and Land use

- 29. We ask for the following:

- a) That the impact upon tourism is not scoped out of the EIA. We do not accept the Applicant's assessment at para 7.12.7 that '*there is no large-scale tourism infrastructure around the site that will be impacted by the Proposed Development*'. Notably the River Bourne and Test are internationally recognised fishing locations.

8.2 – Aviation

- 30. We ask for the following:
 - a) That the impact upon aviation is not scoped out of the EIA. Chilbolton and Popham Airfields are nearby and, as the Applicant has identified, the site is located within a Low Flying Area. MOD helicopters frequently use the River Bourne as a route as part of their low flying activity, which will take them directly over the site. These helicopters operate from the nearby sites at Odiham and Nether Wallop. The Air Ambulance is based at Thruxton.

8.3 – Major Accidents and Disasters

- 31. We ask for the following:
 - a) That an assessment of the impact of a major accident or disaster be included within the ES and not scoped out as suggested. We do not accept that there are adequate controls within the other permitting regimes and we submit that the ES ought to clearly set out the Applicant's contingency plan for dealing with a major disaster or accident. In particular this ought to include the impact upon the local ecology and the run-off into sensitive water systems.

Other matters

- 32. We ask for the following:
 - a) That the EIA does include an assessment of the likely impact of the site on vermin, flies and insect infestations given the handling and storage of waste;
 - b) That the EIA does specifically address the cumulative effect of this proposed site with the existing facilities at the adjacent site in terms of the impact on noise, truck movements, working hours and odour.

HURSTBOURNE PRIORS PARISH COUNCIL
21 MARCH 2019

Appendix 1

Title	Type	Location	Grade	Select to print
THE ISLAND	Listing	THE ISLAND, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
POST OFFICE	Listing	POST OFFICE, 30, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
THE LONG HOUSE	Listing	THE LONG HOUSE, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
CHURCH OF ST MARY	Listing	CHURCH OF ST MARY, TUFTON, Hurstbourne Priors, Basingstoke and Deane, Hampshire	I	<input type="checkbox"/>
THE BEE HOUSE	Listing	THE BEE HOUSE, HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II*	<input type="checkbox"/>
APSLY FARMHOUSE	Listing	APSLY FARMHOUSE, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
CHURCH OF ST ANDREW	Listing	CHURCH OF ST ANDREW, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II*	<input type="checkbox"/>
CARTSHED TO WEST OF BARN AND CARTSHED AT MANOR FARM	Listing	CARTSHED TO WEST OF BARN AND CARTSHED AT MANOR FARM, TUFTON, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
THE MANOR HOUSE	Listing	THE MANOR HOUSE, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
PUMP HOUSE NORTH WEST OF HURSTBOURNE PARK	Listing	PUMP HOUSE NORTH WEST OF HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
LONGTHATCH	Listing	LONGTHATCH, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
BARN AND CARTSHED AT MANOR FARM	Listing	BARN AND CARTSHED AT MANOR FARM, TUFTON, Hurstbourne Priors,	II	<input type="checkbox"/>

		Basingstoke and Deane, Hampshire		
MANOR COTTAGE	Listing	MANOR COTTAGE, TUFTON, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
No name for this Entry	Listing	55, HURSTBOURNE PRIORS, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
KITCHEN GARDEN WALLS WEST AND NORTH WEST OF STABLES OF HURSTBOURNE PARK	Listing	KITCHEN GARDEN WALLS WEST AND NORTH WEST OF STABLES OF HURSTBOURNE PARK, HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
STATUE AND PEDESTAL	Listing	STATUE AND PEDESTAL, HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
STABLE BLOCK TO WEST OF SITE OF FORMER MANSION HOUSE	Listing	STABLE BLOCK TO WEST OF SITE OF FORMER MANSION HOUSE, HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>
HURSTBOURNE PARK	Park and Garden	HURSTBOURNE PARK, Hurstbourne Priors, Basingstoke and Deane, Hampshire	II	<input type="checkbox"/>

Appendix 2

<https://www.basingstoke.gov.uk/content/page/33820/Conservation%20Area%20Map%20for%20Hurstbourne%20Priors.pdf>



The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

22nd March 2019

Consultation Response

Dear Sir/Madam

Town and Country Planning Act 1990

REFERENCE: 19/00181/OBS/OBSZ

DESCRIPTION: Request for observations on a scoping opinion under Regulations 10 and 11 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

LOCATION: WTI/EFW Holdings Limited Wheelabrator Harewood Waste-to- Energy Facility

CASE OFFICER: Matthew Miller, direct line 01344 351764

I refer to your consultation on the above application received on 25th February 2019. My comments are;

01. PINS ref: EN010104

Thank you for consulting Bracknell Forest Council on this matter.

The site lies 42 kilometres (26 miles) from the southwestern edge of Bracknell Forest Borough. As such it is considered that the proposed development would have a negligible impact on traffic movements affecting Bracknell Forest Borough.

Having reviewed the comprehensive 'Wheelabrator Harewood Waste to Energy Facility EIA Scoping Report February 2019', consideration is given to the potentially longer distance environmental impacts associated with the facility, which may have the potential to impact Bracknell Forest Borough, including sections of Windsor Great Park and the Thames Basin Heaths Special Protection Area which fall within the Borough.

Therefore given the potential for air quality impacts to habitat sites in and within the vicinity of Bracknell Forest, the Council welcome paragraph 7.3.5:

'The air quality assessment study area will be agreed with the statutory consultees. It is considered that it will extend:

- up to 10 km from the Site for assessment of operational point source impacts on

human health and statutory ecological receptors.'

Paragraph 6.6.4 states, 'The Zone of Influence (ZOI) of the Proposed Development within which any potential effects of the Proposed Development may combine with the effects arising from other developments has been determined on the basis of the maximum study areas of the technical assessments considered within the EIA. It is considered that for the majority of technical assessments this will not exceed 10 km...'.

In relation to the habitat sites in and within the vicinity of Bracknell Forest Borough, the Council request that the ZOI is agreed with Natural England.

Subject to agreement with Natural England on the assessment of potential air quality impacts on habitat sites, the Council is satisfied that the Scoping Report identifies an appropriate scope for the Environmental Impact Assessment.

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours faithfully

Matthew Miller

Senior Planning Officer
Planning Transport and Countryside
email matthew.miller@bracknell-forest.gov.uk
Direct Line 01344 351764

PLACE PLANNING AND REGENERATION

Bracknell Forest Borough Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD
T: 01344 352000 Minicom: 01344 352045 www.bracknell-forest.gov.uk

From: [Richard White](#)
To: [Case Administration](#)
Subject: FW: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility
Date: 21 March 2019 09:19:12
Attachments: [CAP168Ed10Feb2014-Extract-LightingofObstacles.pdf](#)
[CAP168Ed10Feb2014-Extract-MarkingAndLighting.pdf](#)
[CAP393Ed5-ANO2016ExtractsLightingArticles.pdf](#)

From: Jiggins Craig <Craig.Jiggins@caa.co.uk>
Sent: 18 March 2019 09:20
To: Environmental Services <environmentalservices@planninginspectorate.gov.uk>
Subject: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility

Dear Sir/Madam

I have reviewed the scoping opinion, and whilst you seemed to have covered most aviation aspects, I would also like to offer the following recommendations:

- Middle Wallop Aerodrome, MOD is advised of this proposal: Rhq Army Air Corps Hq Army Air Corps, Middle Wallop, Stockbridge SO20 8DY01264 784384;
- Southampton Airport is advised of this proposal (this is purely because of the close proximity to their Visual Reference Point (VRP) at Bullington Cross): Southampton Airport, Southampton Airport, Southampton SO18 2NL, 023-80627075 (Airside Operations Duty Officer);
- I have not included Chilbolton nor Popham as they are mentioned in the scoping opinion;
- Please note the following guidance: Crane Operations Cranes, whether in situ temporarily or long term are captured by the points heighted above. Note that if a crane is located on top of another structure, it is the overall hgt (structure + crane) than is relevant. Temporary structures such as cranes can be notified through the means of a Notice to Airmen (NOTAM). If above a hgt of 300ft (91.4m) above ground level, the developer must ensure that the crane operator contacts the CAA's Airspace Regulation (AR) section on ARops@caa.co.uk or 02074536599. If the crane is to be in place for in excess of 90 days it should be considered a permanent structure and will need to be notified as such: to that end the developer should also contact the DGC (see above). Additionally, any crane of a hgt of 60m or more will need to be equipped with aviation warning lighting in line with CAA guidance concerning crane operations which is again available at:
<https://publicapps.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20-%20Crane%20Ops.pdf>
- There are several references to the intended installation of lighting, but I have also

attached three documents that will give you guidance as to the type of lighting required, where to position and intensity etc.

- Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the National Police Air Service (NPAS) organisation via email npas.obstructions@npas.pnn.police.uk;
- Due to the unique nature of operations in respect of altitudes and potentially unusual landing sites, it would be sensible for you to establish the related viewpoints of local emergency services Air Support Units through the relevant Air Ambulance Units - <https://associationofairambulances.co.uk/member/hampshire-isle-wight-air-ambulance/>
- It is also included in the opinion about the heights of the stacks so I would also recommend that this proposal should be brought to the attention of the department responsible for maintaining the list and production of charting regarding tall structures at the following email address: dvof@mod.gov.uk
- The proposal should be brought to the attention of the Safeguarding Department within the MOD's Defence Infrastructure Organisation, email: DIO-safeguarding-statutory@mod.uk, to ensure that military aircraft safety is taken into consideration.

Regards

Craig

Craig Jiggins

ATM Technical Specialist

Safety and Airspace Regulation Group (SARG) - Airspace Regulation
Civil Aviation Authority

+442075090242

www.caa.co.uk

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The Air Navigation Order 2016 and Regulations

Published for the use of those concerned with air navigation,
but not to be treated as authoritative (see Foreword)

CAP 393



CHAPTER 2

Lights and lighting

Aeronautical lights

221.—(1) Except with the permission of the CAA and in accordance with any conditions subject to which the permission may be granted, a person must not establish, maintain or alter the character of—

- (a) an aeronautical beacon within the United Kingdom; or
- (b) any aeronautical ground light (other than an aeronautical beacon) at a national licensed aerodrome, or which forms part of the lighting system for use by aircraft taking off from or landing at such an aerodrome.

(2) In the case of an aeronautical beacon which is or may be visible from the waters within an area of a general lighthouse authority, the CAA must not give its permission for the purpose of this article except with the consent of that authority.

(3) A person must not intentionally or negligently damage or interfere with any aeronautical ground light established by or with the permission of the CAA.

Lighting of en-route obstacles

222.—(1) The person in charge of an en-route obstacle must ensure that it is fitted with medium intensity steady red lights positioned as close as possible to the top of the obstacle and at intermediate levels spaced so far as practicable equally between the top lights and ground level with an interval of not more than 52 metres.

(2) The person in charge of an en-route obstacle must, subject to paragraph (3), ensure that by night the lights required to be fitted by this article are displayed.

(3) In the event of the failure of any light which is required by this article to be displayed by night the person in charge must repair or replace the light as soon as reasonably practicable.

(4) At each level on the obstacle where lights are required to be fitted, sufficient lights must be fitted and arranged so as to show when displayed in all directions.

(5) In any particular case the CAA may direct that an en-route obstacle must be fitted with and must display such additional lights in such positions and at such times as it may specify.

(6) A permission may be granted for the purposes of this article for a particular case or class of cases or generally.

(7) This article does not apply to any en-route obstacle for which the CAA has granted a permission to the person in charge permitting that person not to fit and display lights in accordance with this article.

(8) In this article, an “en-route obstacle” means any building, structure or erection, the height of which is 150 metres or more above ground level, but it does not include a building, structure or erection—

- (a) which is in the vicinity of a national licensed aerodrome or an EASA certificated aerodrome; and
- (b) to which section 47 of the Civil Aviation Act 1982 (warning of presence of obstructions near licensed aerodromes) applies.

Lighting of wind turbine generators in United Kingdom territorial waters

223.—(1) Subject to paragraph (10), this article applies to any wind turbine generator—

- (a) the height of which is 60 metres or more above the level of the sea at the highest astronomical tide; and
- (b) which is situated in waters within or adjacent to the United Kingdom up to the seaward limits of the territorial sea.

(2) Subject to paragraph (3) the person in charge of a wind turbine generator must ensure that it is fitted with at least one medium intensity steady red light positioned as close as reasonably practicable to the top of the fixed structure.

(3) If four or more wind turbine generators are located together in the same group, with the permission of the CAA only those on the periphery of the group need be fitted with a light in accordance with paragraph (2).

(4) Subject to paragraph (5), the light or lights required by paragraph (2) must be so fitted as to show when displayed in all directions without interruption.

(5) When displayed—

- (a) the angle of the plane of the beam of peak intensity emitted by the light must be elevated to between three and four degrees above the horizontal plane;
- (b) not more than 45% or less than 20% of the minimum peak intensity specified for a light of this type is to be visible at the horizontal plane;
- (c) not more than 10% of the minimum peak intensity specified for a light of this type is to be visible at a depression of 1.5 degrees or more below the horizontal plane.

(6) Subject to paragraph (7), the person in charge of a wind turbine generator must ensure that by night, any light required to be fitted by this article is displayed.

(7) In the event of the failure of any light which is required by this article to be displayed by night the person in charge of a wind turbine generator must repair or replace the light as soon as reasonably practicable.

(8) If visibility in all directions from every wind turbine generator in a group is more than 5km the light intensity for any light required by this article to be fitted to any generator in the group and displayed may be reduced to not less than 10% of the minimum peak intensity specified for a light of this type.

(9) In any particular case the CAA may direct that a wind turbine generator must be fitted with and display such additional lights in such positions and at such times as it may specify.

(10) This article does not apply to any wind turbine generator for which the CAA has granted a permission to the person in charge permitting that person not to fit and display lights in accordance with this article.

(11) A permission may be granted for the purposes of this article for a particular case or class of cases or generally.

(12) In this article—

- (a) “wind turbine generator” is a generating station which is wholly or mainly driven by wind;
- (b) the height of a wind turbine generator is the height of the fixed structure or if greater the maximum vertical extent of any blade attached to that structure; and
- (c) a wind turbine generator is in the same group as another wind turbine generator if the same person is in charge of both and—
 - (i) it is within 2km of that other wind turbine generator; or
 - (ii) it is within 2km of a wind turbine generator which is in the same group as that other wind turbine generator.

Lights liable to endanger

224.—(1) A person must not exhibit in the United Kingdom any light which—

- (a) by reason of its glare is liable to endanger aircraft taking off from or landing at an aerodrome; or
- (b) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft.

(2) If any light which appears to the CAA to be a light described in paragraph (1) is exhibited, the CAA may direct the person who is the occupier of the place where the light is exhibited or who has charge of the light, to take such steps within a reasonable time as are specified in the direction—

- (a) to extinguish or screen the light; and
- (b) to prevent in the future the exhibition of any other light which may similarly endanger aircraft.

(3) The direction may be served either personally or by post, or by affixing it in some conspicuous place near to the light to which it relates.

(4) In the case of a light which is or may be visible from any waters within the area of a general lighthouse authority, the power of the CAA under this article must not be exercised except with the consent of that authority.

Lights which dazzle or distract

225. A person must not in the United Kingdom direct or shine any light at any aircraft in flight so as to dazzle or distract the pilot of the aircraft.

PART 9

Documents and records

Aircraft continuing airworthiness record system for non-EASA aircraft

226.—(1) In addition to any other log books required to be kept by or under this Order, aircraft continuing airworthiness records must be kept for non-EASA aircraft registered in the United Kingdom, comprising of—

- (a) an aircraft log book;
- (b) a separate engine log book or engine module log cards for each engine fitted in the aircraft; and
- (c) a separate propeller log book for each variable pitch propeller fitted to the aircraft; and
- (d) log cards for any service life limited component, as appropriate.

(2) The continuing airworthiness records must include the information specified in Schedule 7.

(3) Each entry in the continuing airworthiness records—

- (a) must be made
 - (i) in the case of a certificate of release to service, as soon as practicable, but in no case more than 30 days after the date on which the maintenance was completed;
 - (ii) in all other cases, as soon as practicable after the occurrence to which it relates, but in no event more than 7 days after the expiration of the national airworthiness review certificate in force for the aircraft at the time of the occurrence;
- (b) must be made on each occasion that any overhaul, repair, replacement, modification, maintenance or inspection is undertaken on the engine or propeller;
- (c) must be clear and accurate; and
- (d) where it is necessary to correct an earlier entry in the aircraft continuing airworthiness records, must be made in a manner that clearly shows the original entry.

(4) Any document which is incorporated by reference in the continuing airworthiness records is deemed, for the purposes of this Order, to be part of the continuing airworthiness records.

(5) It is the duty of the operator of every aircraft for which continuing airworthiness records are required to be kept to—

- (a) keep them or cause them to be kept in accordance with this article; and

5. procedures for evaluating potential impacts on instrument approach procedures;
 6. procedures for promulgating infringements in the UK Aeronautical Information Publication (AIP), if appropriate.
- 4.70 It is recognised that the need to include all items will vary between aerodromes depending on the nature and scale of operations.

Marking and lighting of obstacles and unserviceable surface areas

General

- 4.71 The following paragraphs contain details of the requirements for the marking and lighting of obstacles on and near aerodromes and for the standards applicable to en route obstacles. The latter is provided for the information of licence holders and to assist them should they be consulted, or their advice sought, on the lighting and marking of obstacles in the vicinity of the aerodromes but beyond the obstacle limitation surface boundaries.
- 4.72 The responsibility for marking and lighting obstacles on or near aerodromes must be determined between the aerodrome licence holder and the owners of the structures. The CAA is not concerned with the allocation of responsibility but may withhold, suspend, vary or withdraw a licence if the following requirements for lighting and/or marking are not met.
- 4.73 Licence holders are responsible for ensuring that all obstacles on the movement area are lit and/or marked as required, irrespective of ownership.
- 4.74 All objects which extend to a height of 150 m or more above ground elevation are regarded as obstacles and shall be lit in accordance with ANO Article 219. Other objects of a lesser height may be assessed as hazards to aviation and also treated as obstacles. They should be marked and/or lit as detailed in the following paragraphs.

Objects to be marked or lit

- 4.75 Indicating the presence of obstacles by marking or lighting is intended to reduce the hazards to aircraft operating at low level or moving on the surface.
- 4.76 Objects which are deemed by the CAA to be en route obstacles should be marked and/or lit.
- 4.77 Other objects inside (and outside) the obstacle limitation surfaces should be marked and/or lighted if an aeronautical study indicates that they could constitute a hazard to aircraft (this includes adjacent to visual routes, e.g. waterways, or highways). Wind turbines, whether on, near or away from the immediate vicinity of an aerodrome, which are deemed to be obstacles, should be marked and/or lit accordingly.

Wind turbines

- 4.78 The rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines should be painted white, unless otherwise indicated by an aeronautical study.
- 4.79 When lighting is deemed necessary, medium intensity obstacle lights should be used. In the case of a wind farm, i.e. group of two or more wind turbines, it should be regarded as an extensive object and the lights should be installed:
1. to identify the perimeter of the wind farm;
 2. respecting the maximum spacing between the lights along the perimeter, unless a dedicated assessment shows that a greater spacing can be used;
 3. so that, where flashing lights are used, they flash simultaneously; and
 4. so that, within a wind farm, any wind turbines of significantly higher elevation are also identified wherever they are located.
- 4.80 The obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching from any direction.
- 4.81 Further information is available in CAP 764, CAA Policy and Guidance on Wind Turbines and ICAO annex 14 Volume 1, chapter 6, Paragraph 6.4.
- 4.82 Objects which are deemed by the CAA to be aerodrome obstacles should, if not removed, be marked and if the aerodrome is used at night, lit except that:
1. obstacles that are sufficiently conspicuous by their shape, size or colour need not be marked;
 2. objects which technically are aerodrome obstacles, but which are deemed to be shielded by other obstacles , need not be marked or lit;
 3. immovable obstacles or terrain which extensively obstruct an aerodrome circuit area need not be marked or lit providing appropriate terrain avoidance procedures have been established;
 4. an obstacle which the CAA considers to be of no operational significance need not be marked or lit.
- 4.83 Vehicles and other mobile objects, excluding aircraft, on the movement area of an aerodrome are obstacles and should be marked and, if the vehicles and aerodrome are used at night or in conditions of low visibility, be lit. Aerodrome licence holders may exempt aircraft servicing equipment and vehicles used only on aprons from this provision provided that they are adequately conspicuous.
- 4.84 Elevated aeronautical ground lights on aerodromes should be made conspicuous by day by a suitable form of marking.

Marking of obstacles

- 4.85 Fixed obstacles that are sufficiently conspicuous by their shape, size or colour need not be otherwise marked.
- 4.86 Fixed obstacles that require marking should be conspicuously coloured. If this is not practicable, markers or flags should be displayed on or above them.
- 4.87 No fixed obstacle need be marked if it is lit.
- 4.88 A fixed obstacle should be coloured to show a chequered pattern if it has essentially unbroken surfaces and its projection on any vertical plane equals or exceeds 4.5 m in both directions. The pattern should consist of rectangles with sides of not less than 1.5 m and not greater than 3 m.
- 4.89 A fixed obstacle should be coloured to show alternating contrasting bands if:
1. it has essentially unbroken surfaces and has one dimension, horizontal or vertical, greater than 1.5 m, and the other dimension, horizontal or vertical, less than 4.5 m; or
 2. it is of skeletal type with either a vertical or horizontal dimension greater than 1.5 m.
- 4.90 The bands should be perpendicular to the longest dimension and have a width the dimensions of which are in accordance with table 4.3 (see figure 4.17).
- 4.91 A fixed obstacle should be coloured in a single conspicuous colour if its projection on any vertical plane has both dimensions less than 1.5 m.

Table 4.3 Marking band widths

Longest dimension			
Greater than	Not exceeding	Band width	
1.5 m	210 m	1/7 of longest dimension)	or 30 m whichever is less
210 m	270 m	1/9 of longest dimension)	
270 m	330 m	1/11 of longest dimension)	
330 m	390 m	1/13 of longest dimension)	
390 m	450 m	1/15 of longest dimension)	
450 m	510 m	1/17 of longest dimension)	
510 m	570 m	1/19 of longest dimension)	
570 m	630 m	1/21 of longest dimension)	

4.100 Marker boards alternating with flags or cones, as described in paragraph 4.9.3 of chapter 7, should be used to delineate an unserviceable portion of a grass aerodrome.

Lighting of obstacles

4.101 Obstacle lights should be used to indicate the existence of objects which are to be lit as follows:

1. Low intensity steady red obstacle lights should be used on obstacles less than 45 m high, except that medium intensity steady red lights should be used to light such obstacles as an elongated structure, an obstacle in the outer area of the approach or high ground adjacent to the aerodrome circuit. There are two types of low intensity obstacle lights for fixed obstacles: Group A and Group B (see table 6A.1).
 - a) Low intensity Group A lights should be used for obstacles on the movement area where Group B lights may cause dazzle.
 - b) Low intensity Group B lights should be used away from the movement area or in areas on the movement area with high levels of background illuminance.
2. Medium intensity red steady obstacle lights should be used on obstacles between 45 m and less than 150 m in height.
3. Medium intensity steady red obstacle lights should be used to indicate the presence of:
 - a) an obstacle if its height is 150 m or more; or
 - b) a tower supporting overhead wires, cables etc. of any height where an aeronautical study indicates such lights to be essential for recognition of the presence of the obstacle.

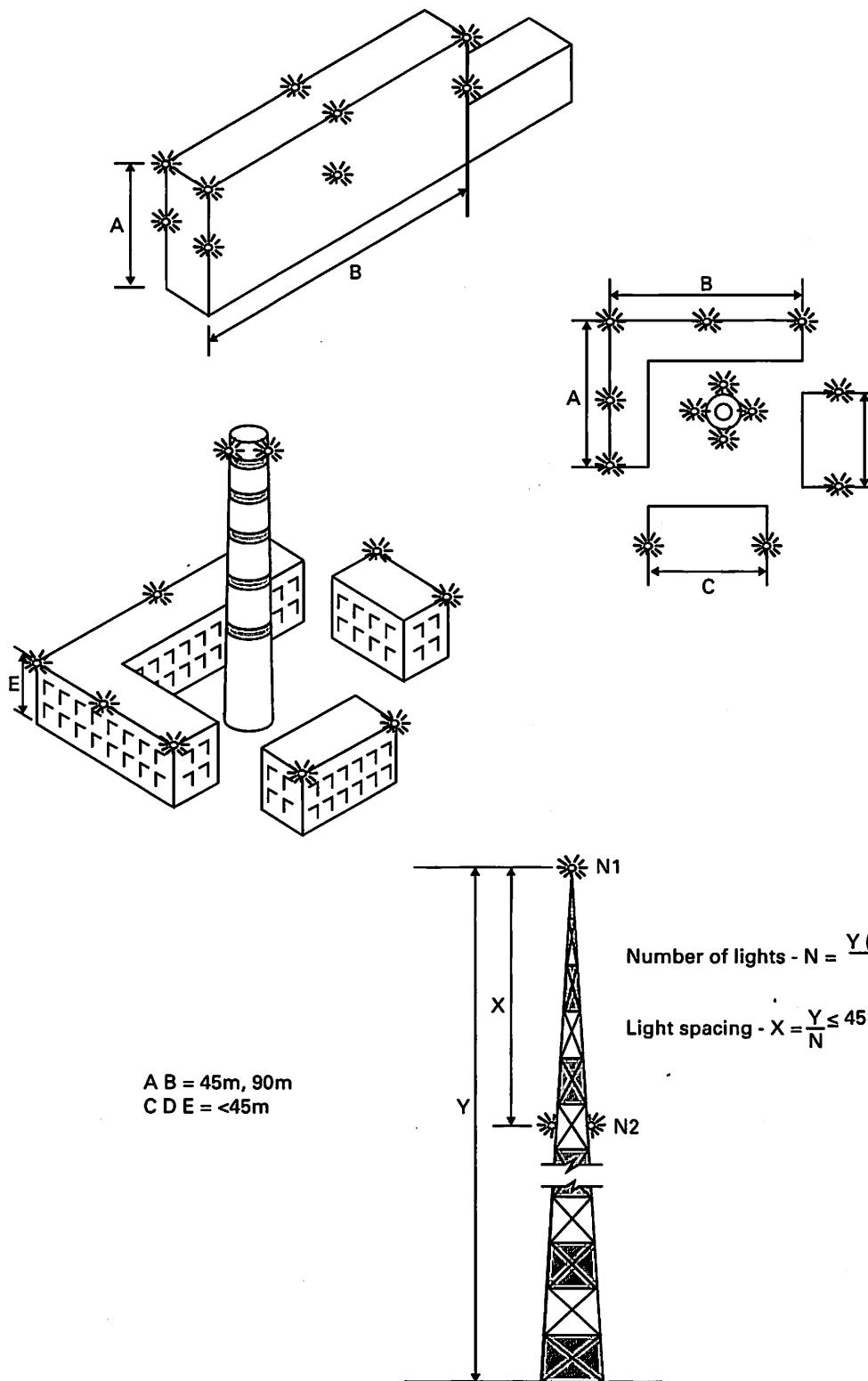
4.102 However, where an aeronautical study conducted by the CAA concludes that greater conspicuity of the obstacle through the use of a higher specification light is required, the use of a high intensity flashing white obstacle light will be considered by the CAA.

4.103 The combination of white and red obstacle lights should not be used at the same time to light an obstacle.

Location of obstacle lights (figure 4.18)

4.104 The top light

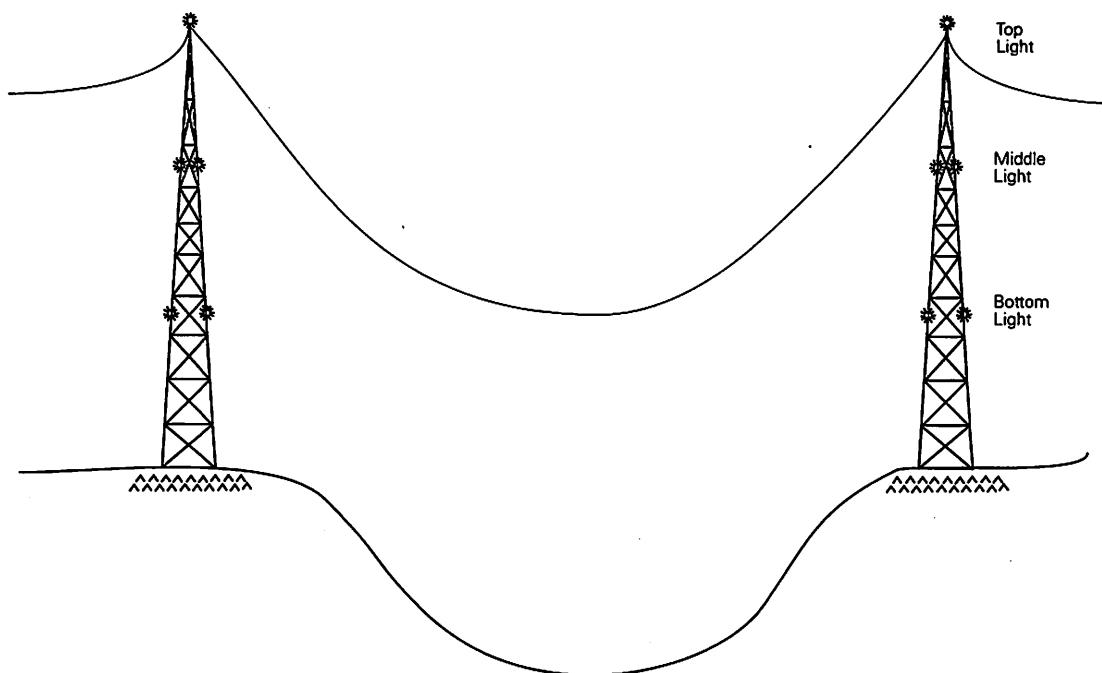
1. Except in the case of a chimney or other similar structure, one or more lights should be located at the top of the obstacle. The lights should be so arranged as to indicate the highest points or edges of the obstacle relative to the obstacle limitation surface. If two or more edges are of the same height, the edge nearest the flight path should be lit. On facing sides of groups of obstacles, lights may be omitted with the approval of the CAA, and the group treated as one solid obstacle.
2. In the case of a chimney or other similar structure, the top light should be placed between 1.5 m and 3.0 m below the top in order to reduce the effects of discolouration or corrosion from the exhaust fumes.
3. In the case of a guyed tower or antenna where it is not possible to locate an obstacle light on the top because of the weight of equipment involved, such a light should be located at the highest practicable point acceptable to the CAA.
4. In the case of a wind turbine, obstacle lights should be installed on the highest point of the nacelle in such a manner as to provide an unobstructed view for aircraft approaching from any direction.

Figure 4.18 Lighting of objects

Intermediate lights

- 4.105 Where the top of an obstacle is more than 45 m above the level of the surrounding ground, additional lights should be provided at intermediate levels. These additional lights should be spaced as equally as practicable between the top light and ground level as follows:
1. when low or medium intensity obstacle lights are used the spacing should not exceed 52 m;
 2. where deemed necessary by an aeronautical study, the spacing of high intensity flashing white obstacle lights on an obstacle other than a tower supporting overhead cables or wires should not exceed 105 m;
 3. where obstacle lights are used on a tower supporting overhead wires or cables (figure 4.19) they should be located at three levels:
 - a) on the top of the tower;
 - b) on the tower at the lowest level of the catenary of the wires or cables; and
 - c) at approximately mid-way between these two levels.
 4. at each level the lights should be arranged to give full cover in azimuth.

Figure 4.19 Example of intermediate lighting



Lighting of unserviceable parts of the movement area

- 4.106 Unserviceable parts of the movement area of an aerodrome used at night should be lit as follows:
1. to delineate unsafe areas, lights should be spaced at intervals of not more than 7.5 m;
 2. to close off unserviceable sections of runways or taxiways, lights should be spaced at intervals of not more than 3 m.

Note: The normal runway and taxiway lighting within the unserviceable area should be suppressed.

- 4.107 A light used to mark unserviceable parts of the movement area should consist of a steady red light of sufficient intensity to ensure conspicuity, considering adjacent lights and the general level of illumination against which it would normally be viewed. It should have a minimum intensity of not less than 10 cd.

Lighting of vehicles

- 4.108 The responsibility for marking and lighting vehicles used on the movement area must be determined between the licence holder and the operators of the vehicles. Licence holders are responsible for ensuring that vehicles on the movement area are lit and/or marked as required, irrespective of ownership.
- 4.109 The specification for yellow flashing vehicle obstacle lights is given in chapter 6, appendix A, table 6A.1. Strobe lighting is unacceptable. Obstacle lights for 'Follow-me' vehicles only shall have characteristics described in figure 6A 19.
- 4.110 The lights specified should be fitted at the highest point of the prime mover vehicle.
- 4.111 The highest point of trailers should be fitted with steady red lights of not less than 10 cd.
- 4.112 Obstacle lights on vehicles should be switched on whenever the vehicles are within the movement area; however, the number of vehicles displaying flashing lights should be restricted to the operational minimum.
- 4.113 Aerodrome ambulances, fire and rescue appliances should, in addition, carry blue flashing lights for use while carrying out emergency duties.
- 4.114 In conditions where emergency vehicles not normally based at an aerodrome are called upon for assistance, flashing blue lights, where fitted, should be operated within the movement area.

Light characteristics (see chapter 6, appendix A, table 6A.1)

Low intensity obstacle lights

- 4.115 On fixed obstacles, low intensity lights should be steady red and omnidirectional.

Medium intensity obstacle lights

4.116 Medium intensity obstacle lights should be steady red light.

High intensity obstacle lights

4.117 High intensity obstacle lights should be flashing white lights.

Replacement of lamps

4.118 Unserviceable lamps should be replaced as soon as possible and in any event within 24 hours. Periodic replacement of all lamps is advisable – the active life being deemed to be 80% of the rated lamp life. Where such preventive maintenance cannot be arranged, tungsten lamps may be underrun on voltage down to a minimum of 90% of rated voltage, provided that the specified output can be met. This procedure should increase lamp life to about 400% of the rated lamp life. When this procedure is used, preventive replacement should be carried out after the increased interval. The requirements for periodic change of lamps may, however, be varied or waived where fittings having acceptable performance and proved life are used.

Note: NOTAM action should be taken to promulgate unserviceabilities.

Periods of illumination of obstacle lighting

4.119 High intensity flashing white obstacle lights should be lit at all times throughout the day and night.

4.120 Steady red medium and low intensity obstacle lights should be lit:

1. on and adjacent to an aerodrome from 30 minutes before sunset to 30 minutes after sunrise during the hours of availability notified in the UK AIP or by NOTAM;
2. on en route obstacles from 30 minutes before sunset to 30 minutes after sunrise. Should switching present problems, these lights may remain lit continuously.

Mr Conor Rafferty
Planning Inspectorate
3/20 Eagle Wing
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: HA/2019/121153/01-L01
Your ref: EN010104

Date: 14 March 2019

Dear Mr Rafferty

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)

LAND WEST OF RAYMOND BROWN WASTE SOLUTIONS, A303 ENVIROPARK, BARTON STACEY, ANDOVER, SO21 3QS

Thank you for the consultation on the above application received on 25 January 2019.

We have reviewed the EIA scoping report produced by WTI EfW Holdings (ref 6056815) and have the following comments to make.

Groundwater

This application is for an Energy to Waste facility. The bedrock underlying this development is the Seaford Chalk which is overlain by Head deposits across some of the site. It does not lie within a source protection zone but the Chalk is designated a Principal Aquifer. The groundwater level is approximately 5-10m below ground level and therefore is sensitive to contamination and needs to be protected.

Section 2.1.4 identifies the geological setting and that the chalk is designated a Principal Aquifer. Section 2.3.1 identifies the Seaford Chalk Principal aquifer as an Ecological Receptor that is potentially at risk and needs to be protected from this development. We would advise that it is a water resources receptor and should be included in the water resources section of the report.

Section 3.9 details the inclusion of a Construction Environmental Management Plan (CEMP). We support the need for this and would highlight that it should include pollution

control measures to prevent the contamination of controlled waters with details on fuel and oil storage.

We would advise that any fuel or oil storage must comply with the Oil Storage regulations. The Best Available Technique (BAT) for the design of a containment system for fuel and oil are:

- All storage vessels are contained using a bund
- The capacity of the bund is either 110% of the largest vessel or 25% of the aggregate capacity of all the vessels that it contains, whichever is greater;
- The bund is capable of withstanding the hydrostatic head of liquid when full;
- The bund is constructed of a material which is impermeable to crude oil and water and is resistant to fire;
- If there are joints in the bund construction, then metal water stops are installed to prevent leakage from joints;
- Sealants used in bund joints are resistant to crude oil and water and are capable of maintaining a seal with thermal expansion and contraction of the bund
- Pipework, cables and instruments do not penetrate the bund walls or floor
- The bund is fitted with a high level alarm
- The bund is fitted with a sump to allow removal of accumulated liquid;

Water Resources (Section 7.7)

Section 7.7 covers the Water Resources section of the Environmental Statement (ES) and includes an assessment of the geological and hydrological setting. We support the need for Baseline Conditions to be determined and the inclusion of a desk based assessment. The site is predominantly greenfield however it is noted that it was previously owned by the MOD and a portable cabin is identified on site, further investigation may be required to identify any potential historic sources of contamination and impact on water resources.

Section 3.4.1 states that the ES will detail the utility requirements including foul and surface water. Sustainable drainage system (SuDS) are not mentioned in the scoping report and if part of the proposed development should be included in the ES. The previous use of the proposed development site could present a medium risk of contamination that could be mobilised by surface water infiltration from a proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Therefore mitigation measures may be required to protect the underlying principal aquifer.

In addition any discharge associated with this development may require an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted. Additional 'Environmental Permitting Guidance' can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>.

Ground Conditions (Section 7.8)

Section 7.8 provides details of the Ground Conditions section of the ES. We support the need for baseline ground conditions to be established and the use of the CIRIA Contaminated Land Risk Assessment; A guide to Good Practise and CLR11 Model Procedures for the Management of Land Contamination. Intrusive site investigations have been carried out and identified PAH and TPH contamination exceeding the

Generic Assessment Criteria (GAC) for controlled waters. A full quantitative risk assessment will be required to identify all the source-pathway-receptor linkages and to inform and determine a remedial strategy, if required, to mitigate against the risks to controlled waters.

Section 7.8.6 identifies that the construction works have the potential to mobilise existing sources of contamination by the direct transfer of contaminants in made ground to the chalk aquifer during piling. We support this as piling and using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. A piling risk assessment may be required to ensure the risks to the underlying principal chalk aquifer are mitigated and this should be addressed in the ES.

Permitting

We welcome the acknowledgement in 3.7.3 that the site will require an environmental permit in order to operate. We would advise early correspondence with ourselves regarding permitting in order to ensure all aspects are considered. We offer an enhanced pre application service which would enable the operator to meet the permitting officer to discuss key concerns/issues.

Air quality

To the south east of the proposed development site lies the Chilbolton Observatory. This site is part of a UK and international monitoring programme and is defined as a rural supersite that monitors the air pollutants in the area. It is recommended that section 7.3 identifies the proximity of the proposal to this monitoring facility. The incinerator may have an impact on the monitoring sites effectiveness and therefore we recommend it should be considered through the Environmental Statement. We would strongly advise the applicant to begin discussions with ourselves to discuss any issues related to this.

Please do not hesitate to contact me on the number below should you have any questions.

Yours sincerely

**Miss Suz Greenwood
Planning Advisor, Environment Agency**

Direct dial 02084745098
Direct fax
Direct e-mail suz.greenwood@environment-agency.gov.uk

Environmental Services
The Planning Inspectorate

25 February 2019

Reference: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility

Dear Sir/Madam,

Thank you for your recent plant enquiry at: Barton Stacey, Handover.

I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP Utilities Group Ltd are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com

Yours faithfully,

Plant Protection Team
ESP Utilities Group Ltd



KT22 7BA

 01372 587500  01372 377996

<http://www.espug.com>

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South East & London Area Office
Bucks Horn Oak
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GU10 4LS

Area Director
Alison Field

VIA EMAIL ONLY

Your Ref EN010104
Our Ref; 23 NSIP Wheelabrator Harewood Waste-to-Energy Facility

Date: 24th March 2019

Dear Mr Rafferty,

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 Forestry Commission on the above application.

The Forestry Commission is the Government experts on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009)¹ for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008). We have reviewed the Environmental Impact Assessment Scoping Report supplied on the 25th February, in particular sections relating to woodland and trees.

The Forestry Commission's summary points are:

- Encourage a thorough assessment of any loss of trees and woodlands within the project boundary.
- Compensate and the use of buffer zones to enhance the resilience of neighbouring woodlands. These ones could include further tree planting or a mosaic of semi natural habitats.

Ancient Woodlands, Ancient Trees and Veteran Trees are acknowledged as irreplaceable habitats and are a part of our Historical Natural heritage. It is not possible to fully compensate for the loss of any irreplaceable habitat such as Ancient Woodland, therefore, the Forestry Commission recommends:

¹ <http://www.legislation.gov.uk/uksi/2009/2264/contents/made>

- Doing everything possible to avoid the loss or damage to ancient woodland and veteran trees;
- Where this is not possible, a significant package of ecologically significant compensation, which collectively delivers ecological enhancement to our ancient woodland and veteran tree infrastructure, is secured in perpetuity.

Ancient Woodland:

Ancient woodlands are irreplaceable. As highlighted in the National Planning Policy Framework revised July 2018²: Irreplaceable habitats include ancient woodland, ancient trees and veteran trees:

Paragraph 175c – “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Within the Scoping Report no ancient woodland has been identified directly within the development area.

The Forestry Commission has also prepared joint standing advice with Natural England on ancient woodland, ancient trees and veteran trees³ which we refer you to as it notes that ancient woodland, ancient trees and veteran trees are an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland.

Within Table 7.4 of the Scoping Report the Ancient Woodland Inventory is identified for the baseline data. Woodland under 2 hectares may not appear on the Ancient Woodland Inventory but may still have ancient woodland characteristics so we would support that a detailed investigation is undertaken to ascertain whether any additional ancient woodlands exist that may be impacted by the proposed scheme.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.

We particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide and Case Decisions](#). The standing advice provides details on the hierarchy of: avoid impacts,

² <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

³ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

mitigate impacts and compensate as a last resort. This hierarchy could apply to any deterioration to woodland, ancient trees and veteran trees within the proposals. Details of any mitigate or compensation should be within the ES.

The scoping report does not give details about if potential veteran trees will be assessed as part of the baseline. Ancient trees and veteran trees can be individual trees, or groups of trees including within hedgerows⁴ and site investigations should identify ancient and veteran trees. If there are no ancient or veteran trees this should be stated in the ES.

There were no constraints maps available with the scoping report. The constraint maps should show Ancient Woodland and all other woodland; we would like to see all woodland assessed for value and impact, and to be considered within mitigation/compensation provisions.

Conclusion

For the loss of any woodland, the Forestry Commission would ask:

- To explore with you how this loss could be further reduced and how direct and indirect impacts on ancient woodland can be minimised;
- It is made clear how creation of new woodland will be targeted to compensate for the loss of all trees and woodlands;
- That the applicant engages with the Forestry Commission at the earliest opportunity so that our expertise can be used to support the development of designs.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely



Richard Pearce
Local Partnership Advisor

⁴ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

A summary of Government policy on ancient woodland

[Natural Environment and Rural Communities Act 2006](#) (published October 2006).

Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

[National Planning Policy Framework](#) (published July 2018).

Paragraph 175 – “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”.

[National Planning Practice Guidance](#) – Natural Environment Guidance. (published March 2014) This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non statutory consultee on “*development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in [Natural England's Ancient Woodland Inventory](#)), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings*”

It also notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, **Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework**. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.

[The UK Forestry Standard](#) (4th edition published August 2017).

Page 23: “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs)”.

[Keepers of Time](#) – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).

Page 10 “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.

[Natural Environment White Paper "The Natural Choice"](#) (published June 2011)

Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.

Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.

[Standing Advice for Ancient Woodland and Veteran Trees](#) (first published October 2014, revised November 2017)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that are relevant to it.

The Standing Advice refers to an [Assessment Guide](#). This guide sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland.

Summaries of some [Case Decisions](#) are also available that demonstrate how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland.

[Biodiversity 2020: a strategy for England's wildlife and ecosystem services](#) (published August 2011).

Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Importance and Designation of Ancient and Native Woodland

Ancient Semi Natural Woodland (ASNW)

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's Inventory of Ancient Woodland.

Plantations on Ancient Woodland Site (PAWS)

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. They can be replanted with conifer and broadleaved trees and can retain ancient woodland features, such as undisturbed soil, ground flora and fungi. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's Inventory of Ancient Woodland.

Other Semi-Natural Woodland (OSNW)

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (i.e., species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'.

Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

Information Tools – The Ancient Woodland Inventory

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than two hectares or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see [Natural England's Ancient Woodland Inventory](#). Inspection may determine that other areas qualify.

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB revised the inventory in their district, including areas under 2ha. Some other local authorities have taken this approach.

Further Guidance

[Felling Licences](#) - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a licence may lead to prosecution and the issue of a restocking notice.

[Environmental Impact Assessment](#) - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, deforestation which is likely to have a significant impact on the environment may also require formal consent from the Forestry Commission.



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Enquiries to

Miss L J McCulloch

My reference

SCO/2019/0174

Direct Line

01962 846581

Your reference

EN010104

Date

25 March 2019

Email

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

*Director of Economy, Transport and Environment
Stuart Jarvis BSc DipTP FCIHT MRTPI*

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 SINCs, 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:

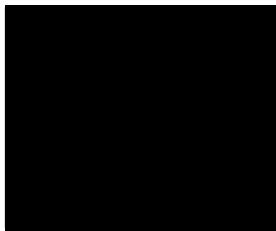
- A description of the control systems to be utilised within the plant to prevent breaches in emission standards or unauthorised releases to air or the water environment;
- Details of waste water treatment for process effluents, ash handling areas and parking areas, roadways etc and processes for dealing 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:

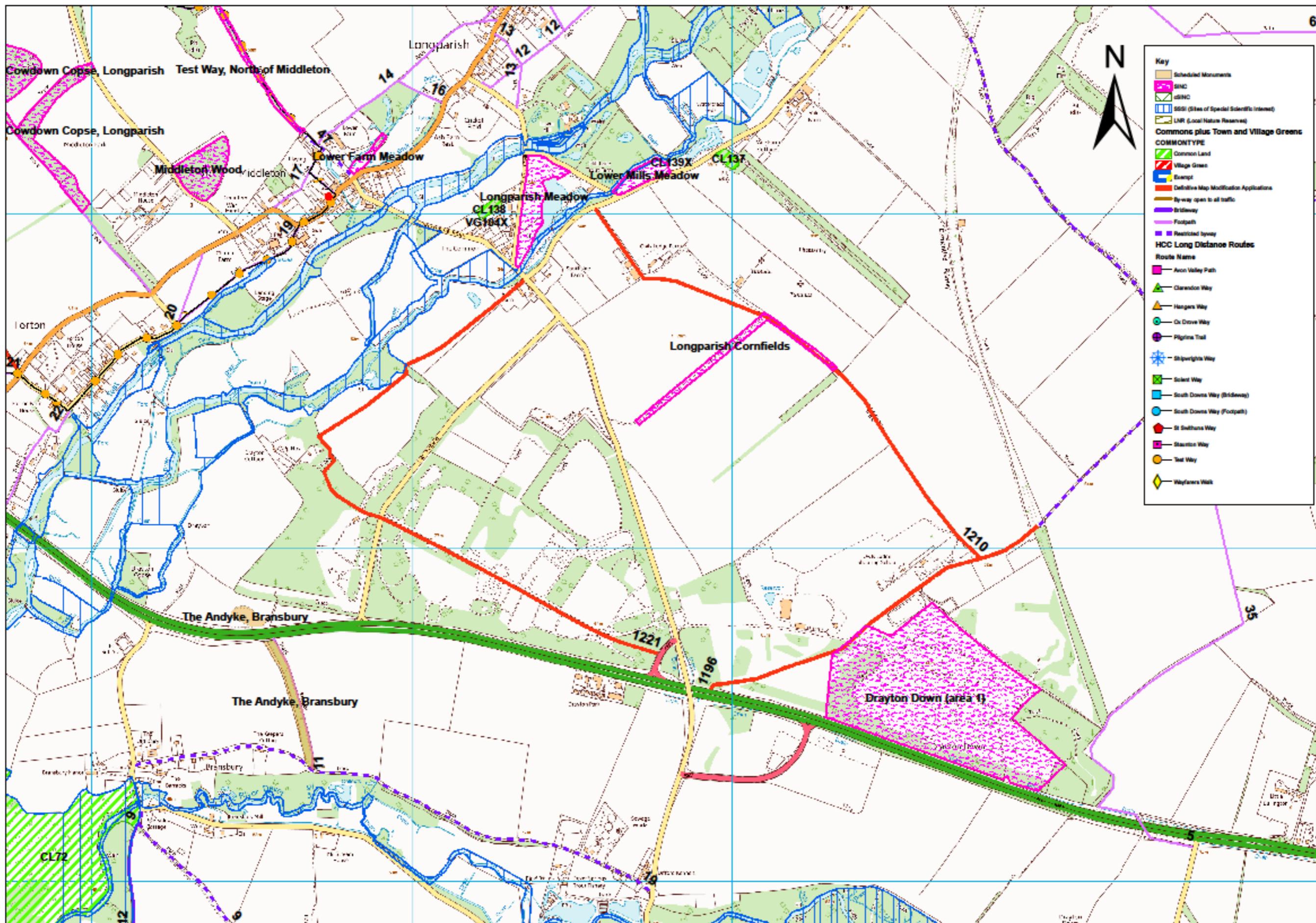
- The use of primary/secondary/recycled/manufactured material resources (including construction, operational and improvements materials);
- The handling, storage and reuse of soils; and
- The generation and management of wastes from site preparation, construction activities and residues from the combustion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



Stuart Jarvis
Director of Economy, Transport and Environment



Mr. C. Rafferty
Major Casework Directorate
By Email

Gosport Neighbourhood Police Office,
Gosport Town Hall, High Street, Gosport,
Hampshire, PO12 1EB
Telephone: 023 8047 8566
E-mail: stuart.york@hampshire.pnn.police.uk
www.hampshire-pcc.gov.uk

Date: 6th March 2019
Enquiries to: Stuart York
Direct Line: 023 8047 8566
Our reference:
Your reference: EN010104

Dear Mr. Rafferty,

SCOPING CONSULTATION – WHEELABRATOR HAREWOOD WASTE-TO-ENERGY FACILITY

Further to your letter of the 25th February 2019, we have no comments to make with reference to this development at this stage.

If I can be of any further assistance please do not hesitate to contact me.

Yours sincerely,

S York
Designing Out Crime Officer

Good afternoon,

Thank you for sending the relevant information and material regarding the Wheelabrator Harewood Waste-to-Energy Facility. Apologies for stating the incorrect scheme in my previous email.

Harlaxton Energy Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe
Distribution Administrator
0844 800 1813

Good afternoon,

Thank you for sending the relevant information and material regarding the Wheelabrator Harewood Waste-to-Energy Facility

Harlaxton Gas Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe
Distribution Administration Assistant



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Please consider the environment before printing this e-mail

From: Dave.Adams2@hse.gov.uk on behalf of NSIP.Applications@hse.gov.uk
To: [Environmental Services](#)
Subject: NSIP - Proposed Wheelabrator Harewood Waste-to-Energy Facility
Date: 14 March 2019 15:14:45
Attachments: [NSIP - Proposed Wheelabrator Harewood Waste-to-Energy Facility - EIA Scoping Consultation, HSE PDF Response.PDF](#)

Dear Richard White,

Thank you for your letter of 25th Feb 2019 regarding the information to be provided in an environmental statement relating to the attached Project. HSE does not comment on EIA Scoping Reports but the attached information is likely to be useful to the applicant.

Kind regards,

Dave Adams

Dave.MHPD.Adams

Major Hazards Policy – Chemicals & Land Use Planning | Chemicals, Explosives & Microbiological Hazards Division | Health and Safety Executive.

Please note that on 24/9/18 I moved to 1.2 Redgrave Court.

1.2 Redgrave Court, Merton Road, Bootle, Merseyside L20 7HS

+44 (0) 20 3028 3408 dave.mhpd.adams@hse.gov.uk

www.hse.gov.uk | <http://hse.gov.uk/landuseplanning>

From: Environmental Services <environmentalservices@planninginspectorate.gov.uk>

Sent: 25 February 2019 11:21

Subject: EN010104 - Wheelabrator Harewood Waste-to-Energy Facility

Dear Sir/Madam

Please see the attached correspondence regarding the proposed Wheelabrator Harewood Waste-to-Energy Facility.

Please note the deadline for the consultation is **25 March 2019**, which is a statutory deadline that cannot be extended.

Kind Regards

Richard White

EIA and Land Rights Advisor
Major Applications & Plans

The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Direct line: 0303 444 5593

Helpline: 0303 444 5000

Email: Richard.White@pins.gsi.gov.uk

Web: infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

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www.hse.gov.uk

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 1.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: EN010104
Our ref: 4.2.1.6578
HSE email: NSIP.applications@hse.gov.uk

Richard White
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

14/03/2019

Dear Richard White

**PROPOSED WHEELABRATOR HAREWOOD WASTE-TO-ENERGY FACILITY - EIA scoping consultation (the project)
PROPOSAL BY WTI/EFW HOLDINGS LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) –
Regulations 10 and 11**

Thank you for your letter of 25th February 2019 regarding the information to be provided in an environmental statement relating to the above project.

HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records there are no major accident hazard sites and one major accident hazard pipelines within the proposed DCO application boundary of the proposed Wheelabrator Harewood Waste to Energy Facility for this nationally significant infrastructure project.

The pipeline details are as follows:

HSE reference: 8049

Pipeline operator: National Grid Gas PLC

Pipeline name: 7 Feeder Barton Stacey / Mappowder

This is based on the current configuration for the as illustrated in figure 1-1 (Site location plan) of the EIA Scoping report.

HSE's land use planning advice will be dependent on where populations will be located in relation to the pipeline.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

Hazardous Substances Consent would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 An Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make as there are no licensed explosive sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively, any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
1.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,



[Redacted]

Dave Adams
(CEMHD4 Policy)

Our Reference: 5943

Dear Conor Rafferty

Planning Inspectorate - Wheelabrator Harewood Waste-to-Energy Facility - EIA Screening Opinion Request Consultation

Thank you for inviting Highways England to comment on Wheelabrator Harewood Waste-to-Energy Facility EIA Screening Opinion Request Consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A303 and in particular its impact at the A303 Eastbound Barton Stacey Junction.

We do not provide comments on EIA Screening Opinion Requests as this is for the Planning Authority to determine. However, due to the proximity of the site to the A303 Eastbound Barton Stacey Junction we would expect that any subsequent Transport Assessment would assess any potential impacts to the A303, both from construction traffic and from HGVs when the site is operational), we would also expect to see a construction management plan and we look forward to continued consultation during the development of this proposal through both the pre-application and application stage.

Kind Regards,
Glen

Glen Strongitharm

Area 3 Spatial Planning Assistant Manager

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: www.highwaysengland.co.uk

GTN: 0300 470 1241

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|National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk**

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Historic England

SOUTH EAST OFFICE

Mr Richard White
The Planning Inspectorate - Major
Applications & Plans
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: 01483 252015

Our ref: PL00552741

25 March 2019

Dear Mr White

WHEELABRATOR, HAREWOOD WASTE TO ENERGY FACILITY, N of BARTON STACEY, HAMPSHIRE: REQUEST FOR EIA SCOPING

Thank you for contacting us on 25 February 2019 regarding an EIA scoping opinion in relation to the above site. On the basis of the latest information about the proposals, detailed below, I offer the following advice.

Advice

The proposal is for scoping to inform a decision regarding development of primarily currently undeveloped grassland for a new energy facility, to include:

- Fuel reception and storage areas (up to 45 m height);
- Boiler house (up to 55 m in height);
- Ash collection area (bottom ash bays)
- Two stacks (one stack for each combustion line - the maximum height for the stack is likely to be between 90-100 m above ground level, but subject to further assessment to determine whether the height can be reduced);
- Stack gas emission control equipment and flue gas treatment plant;
- Above ground distillate storage tanks for use at start up and as an auxiliary fuel;
- Administrative offices;
- Air Cooled Condenser (ACC) to provide cooling across the facility (up to 40 m in height); and
- Substation and mains transformer.

Development on this site has the potential to impact upon both designated and undesignated heritage assets and their settings both within the boundary of the proposed development area and in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020

HistoricEngland.org.uk





SOUTH EAST OFFICE

Designated heritage assets

Our initial assessment of the Scoping Report shows that the designated heritage assets within the near vicinity of the proposed development (a 1km radius) have been identified (section 7.9.2-4), and that archaeology has been scoped in (section 7.9.13). We note that designated built heritage assets have however, been scoped out (section 7.9.14).

The LVIA chapter includes a much broader 15km study area for assessment of landscape and visual effects due to the taller elements of the proposed development (section 7.10.13). It is therefore conceivable that the setting of designated heritage assets further afield than the 1km study area could be affected. Given the scale of the proposed development and the range of heritage assets in the area, we therefore think that all designated heritage assets should be scoped in, and included in the LVIA studies in order to better understand setting impacts.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. An arbitrary radial search may not accurately reflect the impact of the development on heritage assets in the wider area and a more tailored approach that looks at visibility in relation to topography would be required.

Techniques such as photomontages and computer generated views analysis imagery are a useful part of this. Analysis of the views from within the site, out of, and across the site in relation to designated heritage assets will be important. As indicated above, we recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of heritage assets. Setting may also form a part of the wider conceptual significance of a heritage asset. Further guidance on setting can be found at our website (<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>). Version 4 of this document is currently under review.

Non-designated heritage assets

We would expect the Environmental Statement to also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We note that the area of the proposed development has been identified as having significant archaeological potential for archaeology relating to the later prehistoric and Roman periods (sections 7.9.6-7), and consideration must be given that some of these deposits could be related to nearby designated assets, and have the potential to be of





national importance.

We would strongly recommend that conservation and archaeological staff at the relevant County and Local Councils are involved at an early stage. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Further comments

An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it. We think it essential that an integrated *landscape approach* to assessment of heritage assets (both designated and undesignated) is undertaken and translated into the report.

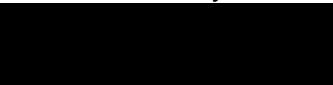
The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area. The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Given the importance of the heritage assets within the area, we would expect to provide further advice in due course on the proposed site, its suitability for development of this type and scale, and potential impacts to heritage from any proposed development.

Recommendation

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,



Rebecca Lambert
Inspector of Ancient Monuments
rebecca.lambert@HistoricEngland.org.uk



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020

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SOUTH EAST OFFICE

WHEELABRATOR, HAREWOOD WASTE TO ENERGY FACILITY, N of BARTON STACEY, HAMPSHIRE: REQUEST FOR EIA SCOPING

List of information on which the above advice is based

Request for scoping opinion from Environmental Services at the Planning Inspectorate dated 25th February 2019

Environmental Impact Assessment scoping report; Wheelabrator Harewood Waste to Energy Facility [produced by AECOM for WTI EfW Holdings Ltd 2019]



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020

HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

Longparish Parish Council
EN010104 Wheelabrator Harewood Waste-to-Energy Facility. Response to the Scoping Document.
24 March 2019

PREAMBLE

Review of the Scoping Report indicates three major factors that must inform any consideration of this application. These are as follows:

1. **NEED.** Section 1.4 of the Report describes the general policy supporting the development of more energy from waste (EFW) capacity, but fails to justify any overriding need for a plant of this capacity in this area. What is the demand for additional capacity in the vicinity of the proposed site, would a smaller (and less intrusive) plant not make a sufficient contribution to meet the requirement in the area, and what guarantee is there that sufficient fuel will be available throughout the planned life of the plant? It also appears counter-intuitive that the burning of man-made waste that produces CO₂ can be classified as ‘renewable’ energy. The IPC must judge “whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project” (NPS).
2. **VISUAL IMPACT.** It is clear from initial comments that the visual impact of an isolated 55 metre high structure with two 90-100 metre high chimneys on rising ground in what is effectively open countryside is one of the key concerns associated with this application and makes the choice of location a very sensitive one. The recycling site next to the proposed development is well screened, of low rise construction, relatively small in scale and unobtrusive, so this cannot be characterised as a pre-existing major industrial site, unlike those chosen for similar developments. All potential impacts on the visual amenity of this essentially rural area and the effect on views from surrounding settlements and vantage points, both nearby and further away, must be considered in detail, and any assessment must be made when the impact is likely to be greatest; i.e. in winter when there is no leaf cover on the trees.
3. **LOCAL INPUT.** The preliminary assessment in the Scoping Report has been carried out by external consultants, and it is apparent from the omissions and errors in the Report highlighted in the detailed comments that the failure to seek information from those living locally has led to a lack of understanding of a range of issues associated with this proposal. Any detailed assessment must therefore engage positively with nearby communities and take full advantage of local knowledge and experience in order to provide a comprehensive overview of all the implications of the proposal.

Detailed comments from Longparish Parish Council are given in the table below and linked with the relevant paragraphs in the Scoping Report:

Document section	Para Ref	Comment
1 Introduction		
1.1 Background	1.1.1	What is the minimum guaranteed output of the proposed facility?
	1.1.4	The sources of waste should be clearly identified, as these will have a material impact on the scope of the EIA and the level of analysis required. Alignment with national, regional and local waste policies should be demonstrated.

Longparish Parish Council
 EN010104 Wheelabrator Harewood Waste-to-Energy Facility. Response to the Scoping Document.
 24 March 2019

		The positive contribution towards the Government's commitment to carbon emission reductions needs to be demonstrated and balanced against the increase in emissions associated with anticipated transport of waste to the facility, and IBAA out of the facility.
1.2 Consenting and Regulatory Regime	1.2.2	The EIA should clearly demonstrate that the minimum guaranteed gross output is greater than 50MW and that security of feedstock exists for the duration of the proposed operational life of the facility to maintain this output.
1.3 The Purpose of Scoping in the Environmental Impact Assessment Process	1.3.2	The Report has been prepared on behalf the Applicant and is therefore subjective. Care must be taken to ensure that the final version makes a fair assessment of impacts and takes account of the limited time respondents have had to consider potential impacts.
1.4 The Need for the Proposed Development		This Section deals with the general need for new energy infrastructure rather than the overriding need for this proposed development – a case to justify this specific proposal is therefore required. The EN provisions that address the adverse impacts, such as EN1 1.1.2, 4.1.4, 4.2.5etc. should also be incorporated.
2 Description of the Existing Environment		
2.1 Site Description		There is insufficient detail in the description of the site. What is referred to as The Street is known locally as Southside Road.
2.2 Site History		
2.3 Potential Environmental Receptors	2.3.1	<p>The environmental receptors appear to be very narrowly defined and the list does not cover a lot of receptors who should be in scope. Specifically, but not exclusively, the following should be included:</p> <p>Human receptors:</p> <ul style="list-style-type: none"> • Local residents of Wherwell, Whitchurch, Tufton, Bullington, Sutton Scotney and Andover • Local farms – there is no Southside farm and the nearest farms are Vale, Owl's Lodge and Middleton Estate • All local schools including Longparish, Barton Stacey, Wherwell, Whitchurch secondary and primary schools • Longparish playgroup • Users of Village Halls such as local clubs • Pedestrians, cyclists, riders and drivers of horse-drawn vehicles

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		<ul style="list-style-type: none"> Users of local playgrounds and sports facilities such as Whitchurch football club (users of Longparish football field) Military personnel on the adjacent MOD training area Users of local businesses and their staff (including fishing and shooting) <p>Traffic and Transport</p> <ul style="list-style-type: none"> The A303 and A34 will both be affected by a potentially significant increase in HGVs and this impact should be considered in the EIA, in particular the extent of the traffic studies should cover, as a minimum, A34 between Bullington Cross Junction and Winchester, and A303 between Andover and the junction with the M3. Cycle routes are not mentioned - the Street is regularly used by cyclists and less frequently by riders and horse-drawn vehicles <p>Other infrastructure and social considerations</p> <ul style="list-style-type: none"> Local tourism and recreation businesses Fly fishing on nearby rivers and lakes, and game shooting on neighbouring estates RAF, Army Air Corps and Popham Airfield
	2.4.1	The site has been subject to flooding from groundwater a number of times, including as recently as February 2014. Therefore the statement regarding the low risk of flooding should be reviewed and revised. Proper flood risk assessment should be carried out and details of mitigation and emergency management plans for the proposed development in the event of a flood provided.
3 Proposed Development Description		
3.1 The Proposed Development Description		
	3.1.1	The proposed use for the heat output should be clearly demonstrated by clearly identifying; the market demand for heat offtake in the vicinity of the facility, the means of transferring the heat offtake to future customers, and the impacts that these provisions would have on all identified receptors.
	3.1.3	The details of the methodology for storage of the waste to ensure uninterrupted operation of the facility should be provided, as well as the operational plans showing how the contamination risks, especially water contamination risks, will be managed in normal operational conditions and in the event of an emergency (fire, flood etc.). The Scoping Report states that the facility would be "CHP ready" - see comment on 3.1.1 above. Information on the operational efficiency of the plant and the reduction in environmental benefits in the event that heat offtake is not secured should be provided, together with analysis of the associated effects on the environment and identified receptors.

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	3.1.4	Details of the proposed site reuse, through life maintenance, including major re-fits, and facility disposal strategy should be included, together with information on the future potential impact on the surrounding countryside, soil and ground pollution management strategy and anticipated carbon footprint impact of the facility over its anticipated life. The operational life of most EfW plants is closer to 25 years.
3.2 Preparation of the Site	3.2.2	The visual and environmental impact of the proposed levelling of the existing bund should be demonstrated and mitigation measures proposed. The bund is in place to mitigate impacts of the existing Raymond Brown operation on the local community. Details of how a workforce of 1,000 personnel will arrive at site should be given: the environmental impact of the additional land take (albeit temporary) and arrangement for car parking, accommodation arrangements etc.
3.3 Plant Description		
3.4 Grid and Utilities Connection		Details of the proposals for managing heat offtake should be presented, together with assessment of impacts on all receptors. Proposals for future connections to the users of heat output should form part of the assessment.
	3.4.2	Details of the proposed grid connections should be presented together with analysis of associated impacts and mitigation measures. In particular, information on what form the connection will take, the route of the connection, interface between the connection and other local infrastructure, the level of interference that will be caused by the installation of the connection and potential visual or other impact on identified receptors should be provided. This should be considered in conjunction with the proposed development.
3.5 Fuel Description	3.5.1	Analysis of the following should be provided: <ul style="list-style-type: none"> • Guaranteed sources of waste • Potential sources of waste • Typical composition of the waste • Sufficiency of guaranteed and potential sources of waste to ensure the gross output of 50MW over the operational life of 50 years • Market analysis of the competing demands for the sources of waste from other facilities in Hampshire and the South of England (the proposed waste catchment area) • Analysis of the effects of Government policies on waste reduction and increased recycling on current and future sources of waste

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		<ul style="list-style-type: none"> • Detailed information on the location of the sources of waste and the logistics of its delivery to the facility • Analysis of the plans for operational continuity of the facility (minimum and maximum amount of waste to be stored, associated handling and environmental safety measures and plans)
3.6 Operations and Access	3.6.2	<p>Detailed analysis of impact on road safety at the E and W-bound junctions with the A303 should be provided, taking into consideration the mixing of HGVs, light commercial vehicles, private vehicles, construction plant, cyclists, pedestrians and others.</p> <p>Analysis of accidents in the area that covers, as a minimum, A34 from Newbury to Winchester, with particular focus on Bullington Cross Interchange, and A303 from the M3 junction to Andover should be provided as part of the road safety impact analysis.</p>
	3.6.3	<p>Plans for traffic management during construction and operation in the event of accident/congestion on A303 and A34 should be prepared, clearly demonstrating alternative routes of access to the facility and associated impact on the receptors.</p> <p>Plan for management of risks of increased litter/waste dislodges from the vehicles transporting it along the road network should be provided. There is already a problem with litter on the access roads.</p>
	3.6.4	<p>Details of proposals for management of construction workers' accommodation, transport, recreation and associated facilities should be provided, as well as analysis of associated impacts.</p>
3.7 Process Description	3.7.7	<p>Analysis of emergency response plans should be provided to cover, as a minimum, fire, flood and major breach/pollution incidents.</p>
	3.7.8	<p>Details of the potential recipients of IBA and their locations should be provided, as well as analysis of their capacity to accept the volumes of IBA to be generated, their location and the plan for logistics and traffic impacts. Details of the landfill sites should be provided, together with analysis of their location and capacity. Consideration should be given to the stockpiling of IBA and transmission of leachate into the ground water in close proximity to a SPZ.</p>
3.8 Indicative Programme		
3.9 Construction Environmental Management Plan		

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4 Consideration of Alternatives		
	4.1.1	A comprehensive analysis of alternative sites should be presented, with particular focus on the number and location of industrial sites with proximity to power and heat offtake locations that have been considered and reasons for their unsuitability. A detailed justification for selection of a development site in the countryside away from sources of waste and market for heat offtake should be presented. It should be demonstrated how analysis of the existing IBA and hazardous waste processing capacity on the adjacent site and the current and future levels of congestions of the A303/A34 network have been taken into consideration when selecting the current site.
5 Planning Policy Context		
5.1 Introduction		
5.2 National Policy Statements	5.2.4	Guidance on the Electricity Works (Environmental Impact Assessment) Regulations 2000 is also relevant in determining the need for EIA to cover any overhead lines included in development of a power station .
	5.2.8	Para 4.2.1 EN1 directs that the EIA must cover “ the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project”. In particular, a detailed analysis of the cumulative effects of the proposed development should be included.
5.3 National Planning Policy Framework (NPPF)		
5.4 National Waste Policy		TVBC and HCC waste policies should also be considered.
5.5 The Development Plan	5.5.3	It is noted that this and other sections are selective in their choice of quotes. It is expected that the EIA will pay proper regard to ALL relevant sections of national and local policy. For example: Policy 10 should be quoted. It states that “Minerals and waste development should not cause adverse public health and safety impacts, and unacceptable adverse amenity impact” and goes on to list objections to such development. Policy 13 notes that “Minerals and waste development should not cause an unacceptable adverse visual impact and should maintain and enhance the distinctive character of the landscape”
	5.5.5	Policy 25 appears to be quoted in part only. Policy 25 in full states “The co-location of activities with existing operations will be supported, where appropriate, if commensurate with the operational life of the site, and where it would not <u>result in intensification of uses that would</u> cause unacceptable harm to the environment or communities in a local area (<u>including access routes</u>), or prolong any unacceptable impacts associated with the existing development.”
6 Proposed EIA Methodology		

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6.1 Introduction		
6.2 EIA Methodology		
6.3 Environmental Design and Management Measures		
6.4 Approach to Assessment Scenarios		
6.5 Approach to Significance Criteria		
6.6 Approach to Effect Interactions and Cumulative Effects Assessment		The Zone of Influence for other developments should be extended in the case of transport considerations to developments affecting a wider area. For example, potential changes to the A303 at Stonehenge fall within the timescale of this development and will have a major impact on traffic flow along the A303.
7 Potentially Significant Environmental Effects		
7.1 Introduction		
7.2 Traffic and Transport		<p>The Traffic and Transport impacts should be considered within the context of the identified sources of waste and uses/disposal sites of the IBA and hazardous waste. The impact on the road network, as a minimum on sections of A34 and A303 set out in the comments on 3.6.2, should be demonstrated. Consideration should be given to other major planned activities nearby along the route of the A303 (Solstice park, A303 Stonehenge tunnel) and the effects of combined HGV increase and associated pressure on the surrounding countryside and local residents.</p> <p>Detailed plans for alternative access routes and operating procedures in the event of an accident/blockage/congestion on the A303 and/or A34 and associated impact assessment should be provided.</p> <p>It should be noted that the Street is, in part, a single track road with limited unofficial passing places unsuitable for large vehicles.</p>
	7.2.5	<p>Although the Street is not designated as a footpath it serves as the only pedestrian link, via the bridge, between the communities of Longparish and Barton Stacey, and is frequently used as such. In particular, it serves patrons of local businesses, such as the Swan Inn and the Cricketers Inn PHs. The Street is also regularly used by cyclists and is a major route for local cycling clubs. Impact on all of these user groups should be demonstrated. The bus to Peter Symonds College stops on the bridge, so minors may be waiting there for some time at peak hours..</p> <p>An important PRoW is likely to be reinstated adjacent to the site under DMMO Barton Stacey 602. This PRoW will greatly improve the connectedness of the minor road and footpath/byway network close to the site by allowing walkers, cyclists and horse riders to move between the routes to the east of Longparish including Longparish 50, 49, and the routes around Barton Stacey such as</p>

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		<p>Barton Stacey 19, via the Barton Stacey A 303 road bridge. Actual usage of this PRoW once approved is difficult to assess but likely to be significant.</p> <p>Several landowners have a right of access over the main track past the Raymond Brown/Fortis Plant, as well as the shooting school. This track also has a history of being a public right of way.</p>
	7.2.6	Traffic counts on A303 E and W-bound and on the junction with the regionally important A34 at Bullington Cross should be carried out as a minimum, to demonstrate potential impact on the adjacent road infrastructure. This should be presented in the context of the established sources of waste and locations for future IBA disposal.
	7.2.12	Traffic impact during the operational period is also expected to be significant and should be demonstrated, together with proposals for mitigation of traffic safety and environmental impacts.
	7.2.13	Given the scale of the development and potentially significant dispersal of sources of waste and IBA disposal sites across the South of England, a traffic model demonstrating the impact and sensitivity of the associated HGV traffic increase is provided. The model should include assumptions of the combined effect of the traffic increase associated with other confirmed planned developments on the affected routes, in particular on the A303 and A34 and the regionally important Bullington Cross interchange. The methodology for determining the extent of the traffic study should engage with local knowledge of traffic conditions in order to avoid any unconscious bias in favour of the developer introduced by subjective professional judgement.
	7.2.14	Assessment should take into consideration other planned developments on route (Solstice park, Stonehenge tunnel and others), given the dispersal of the sources of waste sites and the locations for IBA disposal
	7.2.16	Specific analysis of the impact of the potential increase in congestion on the A303 on the access to local schools should be provided. Impact on cyclist and pedestrian safety in particular should be analysed.
	7.2.18 table 7.3	Pedestrian delay should be included in the scope, as the Street serves as the only pedestrian link between the communities of Longparish and Barton Stacey, and is frequently used as such. It also serves as the only means of pedestrian access for the residents of the mobile home park, who use it in order to get to and from their workplace in the village. On the same basis, Pedestrian Amenity and Community Severance should be included in the scope. It is noted that the impact on Cyclists is not mentioned at all in the scoping document. This must be included, and proper assessment of the amenity effects, access, tourism, disruption of use and safety impacts should be provided.

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		Fear and Intimidation should be included in the scope, given the regular and continued use of the Street by pedestrians and cyclists and other vulnerable road users.
7.3 Air Quality	7.3.2	Air quality should be examined, particularly at key pinch points such as Bullington Cross, where, at peak times, there can be significant queues of vehicles trying to get onto the southbound A34. It should be noted that air pollution/odour from the settlement activity of bottom ash at the existing Fortis operation has been reported to the Environment Agency since June 2016 over two years ago and is one area that requires further study, as a matter of urgency.
	7.3.4	Baseline air quality should be based on locally recorded data.
	7.3.8	Given existing concerns about odour from the current IBAA processing plant, the potential significant impact of odour on nearby human receptors must be reviewed and odour management plans specified. Robustness of the management process should be demonstrated, together with fail-safe mitigation plans. Odour should be included in the scope of the Environmental Impact Assessment.
	7.3.10	Plume dispersion, effect of temperature inversions etc. is a complex subject especially in a shallow valley area such as the proposed site that runs perpendicular to the prevailing wind direction. One of the big issues with valleys concerns anticyclonic conditions which can produce temperature inversions that trap pollutant in the valley. Research shows that anticyclones are becoming more prevalent over Western Europe as global warming takes hold. Longparish and Barton Stacey etc could become more frequently shrouded in the pollution for extended periods over the coming decades as the result of the proposed development. It is clear that historic data may be no reliable indicator of future plume dispersion. Impact assessments should therefore be based on worst case.
7.4 Human Health Assessment		
		Air quality assessment should include effects of the increase in HGV traffic on the A303/A34 and potential increase in congestion and associated vehicle emissions.
7.5 Noise and Vibration		Clarify where and what is being assessed. The assessment should include specifically any vehicle reversing alarms, dumping of waste into bunkers and other operational and processing noise.
	7.5.11	It is anticipated that the proposed development will affect traffic levels on both the local and the national roads adjacent to the site, therefore impact of the change of traffic noise levels should be evaluated on the local roads as well as the A303 and A34.
7.6 Ecology		The EIA must carry out all the requirements set out in wildlife legislation, not exclusively, but especially, the Wildlife and Countryside Act 1981 and the Countryside and Right of Way Act

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		<p>2000.</p> <p>The EIA should consider how the proposed development will comply with relevant good practice of achieving no overall loss of biodiversity.</p> <p>The adjacent field has a rich diversity of plants, nesting birds including a Schedule 1 species, reptiles, amphibians and especially insects, one butterfly is a priority species and one a candidate priority species on the UK Biodiversity Action Plan status and indicator plants including two species of orchid. Undoubtedly some of these species will occur on the development site.</p> <p>The adjacent field to the North is regularly used as an education resource because of its natural history interest. Two schools and the Longparish Countryside Club have been continuous users for the past five years.</p>
	7.6.15	<p>There is very little spare space available within the footprint of the site, so it is unclear how any effective landscaping plan could be created.</p>
7.7 Water Resources		<p>The Environment agency has already stated that there is over-abstraction in the Test and Itchen River catchments. With the Picket Twenty development this will reach a tipping point and an internationally important habitat system could be destroyed.</p>
	7.7.4	<p>The statement regarding absence of surface water connectivity should be reviewed. The site is a known source of a winterbourne which crosses the A303 via a culvert. During periods of high water table a permanent stream is evident, and there are reports of historic flooding of A303 in the adjacent area. Adequate consideration must be given to groundwater connectivity and impact upon this given the comments contained in section 7.8.4 regarding the “main and most sensitive receptor” being groundwater.</p>
	7.7.5	<p>The potential effects resulting from the two storage reservoirs becoming contaminated should be considered, or the absence of hydraulic connectivity with ground water should be demonstrated.</p>
	7.7.9	<p>Will pilings have any effect on the aquifer?</p> <p>The management of ground water during construction and potential plan to meet the “dewatering” requirements should be demonstrated. In particular, management of the water which may need to be extracted in order to build (what is expected to be, considerable) foundations should be described in detail. In particular, if the water is to be pumped back into the river system, the impact of introducing high levels of silt on the aquatic habitats should be evaluated in detail.</p>
	7.7.10	<p>Plans for emergency management should be provided, covering flood/fire/pollution events as a minimum.</p>
	7.7.12	<p>Confirmation and evidence is needed to show that there is no potential adverse effect on the Rivers Test and Dever.</p>

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	7.7.18	The effectiveness and safety of the proposed soakaway drainage must be demonstrated, given that the proposed site is located over a designated aquifer and is close to protected water sources. A comprehensive water and drainage management plan must be provided clearly demonstrating potential risks and impacts arising from the proposed construction and operation (routine and emergency).
7.8 Ground Conditions		
7.9 Archaeology and Cultural Heritage		
	7.9.2	It is unclear why the scoping assessment study area has been restricted to a radius of 1 km, as there are approximately 55 listed buildings within 3 kms of the proposed site, including a Grade 1 listed Church in Longparish. Further study at a greater radius, should be undertaken. The impact on such built heritage should clearly be considered, demonstrating which settings will be compromised by the proposed development, in view of its height and mass. Any review of archaeological data should also include Hampshire County Council's HER.
	7.9.14	Built heritage should be scoped in and considered within a study area of at least 5 kms. Given the fact that the majority of the vegetation within the vicinity is deciduous, it cannot be taken into account unless it completely screens the development throughout the year and can be reasonably expected to do so for the duration of the lifecycle of the facility.
7.10 Landscape and Visual Impact Assessment		<p>The visual impact of the proposed development would be considerable and would clearly result in a significant loss of amenity for surrounding communities over a wide area. Even the preliminary analysis in Appendix B demonstrates that the harmful effects would be felt as far out as Beacon Hill between Whitchurch and Newbury. This aspect of the study therefore requires to be carried out in great detail.</p> <p>South Downs National Park is located 11.5 kms south-south east of the site, and parts of the New Forest National Park are located within 30 kms south of the site. Both of these areas should be included in the list of visual impact receptors.</p>
	7.10.4	The link between the height of the proposed building and chimneys and guidance on the Zone of Theoretical Visibility (ZTV) for wind farms is understood, but takes no account of the significantly increased visual impact of a solid structure.
	7.10.6	The initial search area of 30 kms took account of visible plume. Reduced intended study area takes no account of this. It should also take account of aircraft warning lights on the stacks to the extent these are visible from the ground.
	7.10.13	The Report seeks to reduce the radius of study to 15 kms, but it is clear from the map at Figure B.3 that the chimneys would be visible out to a radius of 30 kms, particularly if there is a column

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		of steam on cold days. Figure B.1 clearly identifies that there will be significant areas (particularly to the west) where the main building envelope will be visible at 20kms. Visual Representation of Wind Farms' (Scottish Natural Heritage (SNH), 2017 (Para 48) guidance for visual impact for structures with a height 51-70 mtrs recommends a ZTV of radius 20 kms, and for a height of 86-100 mtrs recommends a ZTV of radius 30 kms. The scope of the study should therefore be broadened to 30 kms.
	7.10.15	Representative viewpoints should not be taken as exclusive. It is also noted that the attached photographs are taken with heavy foliage present.
	7.10.27	March is considered to be too late to properly assess winter conditions, as spring regrowth has already started - January/February would be more appropriate. The illustrative photographs in Figures B.5 to B.24 were all taken with the trees in full leaf so do not show how much more visible the site would be in winter. Any such representations included in the final assessment must have the scale of the proposed structures superimposed and show their full impact when there are no leaves on the trees.
7.11 Climate Change		
	7.11.7 table 7.14	Impacts from vehicle movements from site should also be considered, given the need for IBA and toxic waste disposal.
	7.11.8	Emissions from maintenance and estimate of fault time (looking at emissions from similar plants when not working optimally) should be scoped in so that realistic cumulative impact is modelled.
7.12 Socio-economics and Land use		
	7.12.7	The Report is in error by seeking to scope out tourism. While there are no large tourist attractions in the area, Test Valley generates some £150m through visitors to the area (https://www.testvalley.gov.uk/assets/attach/3790/Test%20Valley.pdf). They mainly engage in outdoor activities such as walking, cycling, shooting and fishing on chalk streams such as the Test, Itchen and Dever. The potential knock-on impact on pubs, restaurants, cafes, and tourist accommodation must be assessed. Furthermore, the site is next to the A303 and would be clearly visible from what is the main tourist route to the South West. The potential impact on house prices in the area should also be assessed.
	7.12.4	Consideration should also be given to the impact on local fishing tourism. This should include the world renowned chalk bed fishing streams as well as fishing ponds in the very local area. There is also a Kart Racing track adjacent to the site that should be considered in the review
	7.12.4	Consideration should be given to the odours created by the site both in the construction and operational phases

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	7.12.4	An assessment should be made as to the risk of industrial waste being passed to the aquifer during the construction and operational phases. This is important not only to the quality of water for domestic and commercial use but also the risk of pollution of the water in the surrounding rivers that are world famous for the quality of chalk bed trout fishing
	7.12.6	The impact of 50 workers in the operational phase will have a direct effect on local amenities and so should be included within the scope of the report
	7.12.7	The site is very close to world class chalk bed trout fishing streams and draws fishermen from around the world. The impact of this site should be assessed both in terms of the environmental effect but also the potential effects on local business who support this tourism both directly and indirectly
	7.12.7	The Street is a popular cycle route and is regularly used by cyclists. An assessment on the impact both during construction and in the operational phase should be undertaken
8 Environmental Topics to be Scoped out of the EIA		
8.1 Introduction		
8.2 Aviation		
	8.2.2	Aviation must be included in the scope of the EIA, because the site is located on a low-flying route for military helicopters and the adjacent MOD training area is used for military helicopter training.
8.3 Major Accidents and Disasters		Specific assessment of major fire and flood events should be included, and it is not sufficient to suggest that adequate precautionary measures would be in place to mitigate the risk – witness the fire at an EFW facility in Kent on 13 March. Chaos was caused in Andover and the surrounding villages recently by a major fire at an Ocado warehouse equipped with the latest technology, including fire detection and sprinkler systems.
8.4 Electronic Interference		
8.5 Daylight, Sunlight and Overshadowing		Potential overshadowing of the existing renewable energy plant on the adjacent site is considered to be an important issue and must be included in any assessment. Compensation is not an adequate response to the potential loss of generating capacity.
9 Proposed Structure of the Environmental Statement		
9.2 Structure of Technical Chapters		
10 Summary and Conclusions		
10.1 Conclusion		
10.2 Summary of Environmental Topics		



Ministry
of Defence

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore

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The Planning Inspectorate
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Temple Quay House
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22 March 2019

Your reference: EN010104
Our reference: **10045330**

Dear Conor

MOD Safeguarding – SOSA (Site outside of statutory safeguarding areas)

- Proposal:** 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)
- Location:** A303 Enviropark, Drayton Road, Barton Stacey, Andover, SO21 3QS
- Grid Ref:** 443942, 142846

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence (MOD) statutory safeguarding areas (SOSA). We can therefore confirm that the MOD has no safeguarding objections to this proposal.

In the interests of air safety, the MOD requests that the structure is fitted with aviation warning lighting. The mast should be fitted with a minimum intensity 25 candela omni directional flashing red light or equivalent infra-red light fitted at the highest practicable point of the structure.

Whilst we have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. Defence Infrastructure Organisation (DIO) Safeguarding therefore requests that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing:

- a. Precise location of development.
- b. Date of commencement of construction.
- c. Date of completion of construction.
- d. The height above ground level of the tallest structure.

- e. The maximum extension height of any construction equipment.
- f. Details of aviation warning lighting fitted to the structure(s)

This information can be sent by e-mail to the Defence Geographic Centre at: dvof@mod.gov.uk or post it to:

D-UKDOF & Power Lines
Geospatial Air Information Team
Defence Geographic Centre
DGIA
Elmwood Avenue
Feltham
Middlesex
TW13 7AH

Cranes

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect military practice air safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting). The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements.

I trust this adequately explains our position on this matter, however should you have any questions regarding this matter please do not hesitate to contact me.

Yours sincerely


Debbie Baker
DIO Safeguarding

Land and Acquisitions

Spencer Jefferies
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SUBMITTED ELECTRONICALLY:
Environmentalservices@planninginspectorate.gov.uk

www.nationalgrid.com

25 March 2019

Dear Sir/Madam

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)

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG)

I refer to your letter dated 25th February 2019 regarding the Order. NGET and NGG have no assets in the vicinity of the Order therefore, do not object to the Order and wish for no further consultation.

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely



Spencer Jefferies
Development Liaison Officer, Land and Acquisitions.

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully



NATS Safeguarding

D: 01489 444687

E: NATSSafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



Date: 25 March 2019
Our ref: 274898
Your ref: EN010104 EIA Scoping



Conor Rafferty
EIA and Land Rights Advisor
on behalf of the Secretary of State

BY EMAIL ONLY

Customer
Services
Hornbeam
House
Crewe
Business Park
Electra Way
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Cheshire
CW1 6GJ

T 0300 060
3900

Dear Conor

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Wheelabrator Harewood Waste to Energy Facility

Location: A303 Enviropark, Drayton Road, Barton Stacey, Andover, Hampshire, SO21 3QS

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 25 February 2019 which we received on 25 February 2019.

Natural England is a non-departmental public body. Our 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.

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 or not to grant planning permission. Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development is provided below.

Ecology

We note the information included in the scoping report with regard to the assessment of designated and non-designated sites, protected species, priority habitats and species, and wider biodiversity. Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the determination of this forthcoming application.

The ecological assessment should also assess the impact of the proposals on the wider ecological network and identify any important corridors that may be affected. 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

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/+//http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

109), which should be demonstrated through the ES. The measures to enhance wildlife areas and strengthen ecological corridors should therefore be incorporated into a Biodiversity Enhancement Management Plan and could be achieved by retaining wildlife areas, mature trees, hedgerows, planting native species, new woodland areas and new hedgerows.

Protected species

The scoping report sets out the protected species ecological surveys being undertaken as part of the EIA. Detailed consideration of these issues within the EIA is required with mitigation strategies, as appropriate. It is noted that some species have been screened out of the EIA (Hazel dormice, badger, otter and water vole) as a result of the outcomes of the Preliminary Ecological Appraisal (PEA) however the PEA has not been submitted with the EIA scoping document so Natural England recommends the information is submitted in support of the ES.

It is noted that there will be no separate Lighting Chapter. However, the impact of a change in lighting from the development on sensitive species, such as bats, will be assessed in the ecology chapter.

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 notes that a habitat survey (equivalent to Phase 2) has been carried out on the site, in order to identify any important habitats present. In addition, ornithological and botanical surveys have been carried out 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 Hampshire Biodiversity Information Centre (HBIC) should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

Biodiversity mitigation, compensation and enhancement

In order to secure appropriate biodiversity mitigation and enhancements Natural England recommends that the Environmental Statement is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP). The BMEP should include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual biodiversity losses that cannot be fully mitigated on site. This might include the provision of offsite

replacement habitats, or an agreed financial contribution for biodiversity enhancements elsewhere calculated using a Biodiversity Compensation Framework, Environment Bank, or similar mechanism.

In the recent 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted.

Natural England strongly recommends that this proposal achieves a net gain for biodiversity and we advise that a biodiversity metric is used to help with this process. Where residual biodiversity losses are considered unavoidable, Natural England recommends that further advice on these aspects is sought through our Discretionary Advice Service (DAS). Further information on the DAS service and how to apply can be found here:

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

Landscape and visual impacts

Natural England notes that a full Landscape and Visual Impact Assessment is proposed as part of the ES, we welcome the inclusion within this of the consideration of impacts from the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and the South Downs AONB.

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.

Traffic and Transport

We note that impacts from any proposed increase in traffic on environmental receptors will be dealt with within the Ecology section.

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.

We note that the air quality report will assess impacts from both the operational phase of the proposed development and associated road traffic movements on nationally and locally designated sites, we recommend this is extended to cover priority habitats to inform the BMEP. We recommend that any potential impacts from the construction phase of the proposed development, both in terms of dust and emissions, should be considered on nationally and locally designated sites and priority habitats either within this chapter or within the Ecology chapter.

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.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Nicola Brown on 0208 026 8544. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Nicola Brown
New Forest Team

Planning

Service Manager: David Groom

Mr Rafferty
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref: ENQ/19/20165

Your Ref: EN010104

25 March 2019

Dear Mr Rafferty

Land At Wheelabrator Harewood Waste-To-Energy Facility

Thank you for consulting New Forest District Council on the scoping opinion for proposed development consisting of a waste to energy facility producing low carbon electricity and heat through waste derived fuels.

In the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, New Forest District Council has no concerns over direct impacts of the development, however, indirect impacts should be assessed in the Environmental Statement, in particular in terms of highways, ecology and environmental health.

The development would generate heavy goods vehicles movement during construction and operation, i.e. fuel would be delivered to the site by road. Whilst there is no information on whether trips across the area of New Forest District would take place, it is possible that trips would be made between the application site and waste management sites located within the District (including Marchwood Waste Transfer Station and Blue Haze Landfill site). Sufficient information should be provided to allow assessment of the potential implications of the development on road traffic, noise and air quality within the District and its sensitive areas located within the District or nearby, including New Forest National Park and internationally protected European sites. Appropriate mitigation, avoidance or compensation measures should be identified in the Environmental Statement.

If you do have any queries or are unsure about anything in this letter, please do not hesitate to contact me.

Yours sincerely

Arleta Miszewska
Senior Development Management Officer

Tel: 023 8028 5588

Email: dev.control@nfdc.gov.uk

Please read our Privacy Notice by following this link:

<http://www.newforest.gov.uk/article/18330/Planning-privacy-notice-GDPR>



Conor Rafferty
EIA & Land Rights Advisor
The Planning Inspectorate
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Temple Quay House
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26 February 2019

**City Development -
Development Management**

Civic Offices
Guildhall Square
Portsmouth
PO1 2AU

Phone: 023 9283 4324

Email: alan.banting@portsmouthcc.gov.uk

Ref: EN010104

Dear Mr Rafferty

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

I refer to your letter dated 25 February 2019 concerning the request of the applicant for a Scoping Opinion relating to the above proposed development.

Having regard to the separation distance of around 50 miles between the project and the City of Portsmouth it appears unlikely to have any significant impact although attention is drawn to the Solent SPAs and international importance for its wildlife.

Each winter, the Solent hosts over 90,000 waders and wildfowl including 10 per cent of the global population of brent geese. These birds come from as far as Siberia to feed and roost before returning to their summer habitats to breed. Three Special Protection Areas (SPAs) - Portsmouth Harbour, Chichester & Langstone Harbours and Solent & Southampton Water - were designated by the Government predominantly to protect these over-wintering birds.

Yours sincerely

A Banting

Alan Banting
DM Team Leader (Planning)



Public Health England

Environmental Hazards and
Emergencies Department
Centre for Radiation, Chemical and
Environmental Hazards (CRCE)
Seaton House
City Link
London Road
Nottingham NG2 4LA

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Mr Conor Rafferty
EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref : EN010104

Our Ref : 49671

25th March 2019

Dear Mr Rafferty,

**Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed
Wheelabrator Harewood Waste-to-Energy Facility**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Advice offered by PHE is impartial and independent.

Environmental Public Health

This section of the response focuses on health protection issues relating to chemicals and radiation. We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the ES. PHE however believes the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be

relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made the promoters should fully explain and justify their rationale in the submitted documentation.

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF). The proposer should confirm either that the proposed development does include or impact upon any potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

We note that following a generic quantitative risk assessment the applicant has deemed there is unlikely to be an unacceptable risk to human health from the soil. This is despite higher levels of contaminants found in one of the trial pits. While the conclusion may be justifiable, we would appreciate more detail on the investigation and risk assessment, i.e. the evidence for this conclusion. Additionally no details of a complaints procedure for community concerns during construction and operation have been detailed, as highlighted in the appendix this is one of the areas PHE is of the opinion all promoters should address when preparing an ES.

The attached appendix outlines generic areas (relating to chemical and radiological hazards) that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.

Human Health and Wellbeing

This section of PHE's scoping response, identifies the wider determinants of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether they are likely to give rise to significant effects. PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report PHE wish to make the following specific comments and recommendations:

Methodology

Population and human health

The scoping report does not identify a definition of health. The scoping report should accept the broad definition of health proposed by the World Health Organisation (WHO) and also include specific reference to mental health within the definition of health.

The scoping report does not identify any aspects to be scoped out of the assessment for population and human health. The list of wider determinants to be scoped into the ES, by the applicant is therefore unclear.

Recommendation

The EIA should accept the broad definition of health proposed by the World Health Organisation (WHO) and also include specific reference to mental health within the definition of health.

Vulnerable populations

An approach to the identification of vulnerable populations has not been provided and does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The Environmental Statement and any Equalities Impact Assessment should not be completely separated.

Recommendation

The EIA should clearly identify the range of vulnerable populations that have been considered within the assessment

The assessments and findings of the Environmental Statement and any Equalities Impact Assessment should be crossed reference between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.

Mental health

Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report¹, jointly published by Liverpool John Moores University and the Health Protection Agency (HPA), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within ES’ as good practice.

¹ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Recommendation

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both.

An estimation of community anxiety and stress should be included as part of the assessment of the proposed plans.

Yours sincerely,

On behalf of Public Health England
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA². It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES³.

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place

² Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from:
<http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/>

³ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken. PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed⁴ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

⁴ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

For wastes delivered to the installation:

- the EIA should consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁵, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be

⁵ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

negligible.” PHE supports the inclusion of this information within EIAs as good practice.

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/22476/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE’s predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+/www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m^{-1} (kilovolts per metre) and $100 \mu\text{T}$ (microtesla). The reference level for magnetic fields changes to $200 \mu\text{T}$ in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection⁶ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards⁷ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

PHE expects promoters to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to

⁶ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

⁷ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group). Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated⁸. The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate. The methods for assessing individual and collective radiation doses should follow the guidance given in ‘Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012’⁹. It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed. Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities¹⁰. PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years. The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased. For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose. For inadvertent intrusion, the dose if the intrusion occurs should be presented.

⁸ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at <https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

⁹ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA). Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012. https://www.gov.uk/uploads/system/uploads/attachment_data/file/296390/geho1202bkh-e-e.pdf

¹⁰ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered. The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach¹¹ is used

¹¹ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24



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SO21 2SW

Tel: 0330 303 0119
Email: developperservices@southernwater.co.uk

Your Ref
EN010104

Our Ref
PLAN-027106
Date
25/03/2019

Dear Sirs,

Proposal: Development Consent' to construct and operate a new Waste to Energy Facility of up to 65 Megawatts (MW) gross electrical output (hereinafter referred to as "the Proposed Development") to the north of Barton Stacey in Hampshire.

Site: Wheelabrator Harewood Waste-to-Energy Facility, Winchester, Barton Stacey, SO21 3QS.

EN010104

Thank you for your letter of 25/02/2019.

Further to your scoping document consultation for the above development site, I have the following observations to make in respect of the proposed development:

- The proposed development lies over Seaford Chalk formation, a principal aquifer, and in proximity of Source Protection Zone around Barton Stacey Water Supply Works, one of Southern Water's public water supply sources, as defined under the Environment Agency's Groundwater Protection Policy. Southern Water requests that a suitable impact assessment of the long term impact on the underground water supply sources is provided for review. The assessment shall address the following:
 - long term potential risk of contamination to underground resources – assessment of handling and storage of process wastes as well as storage of any fuels/chemicals and risks to groundwater.
 - any storage and treatment of process wastes needs to be above ground, suitably bunded and with appropriate leak monitoring/detection –

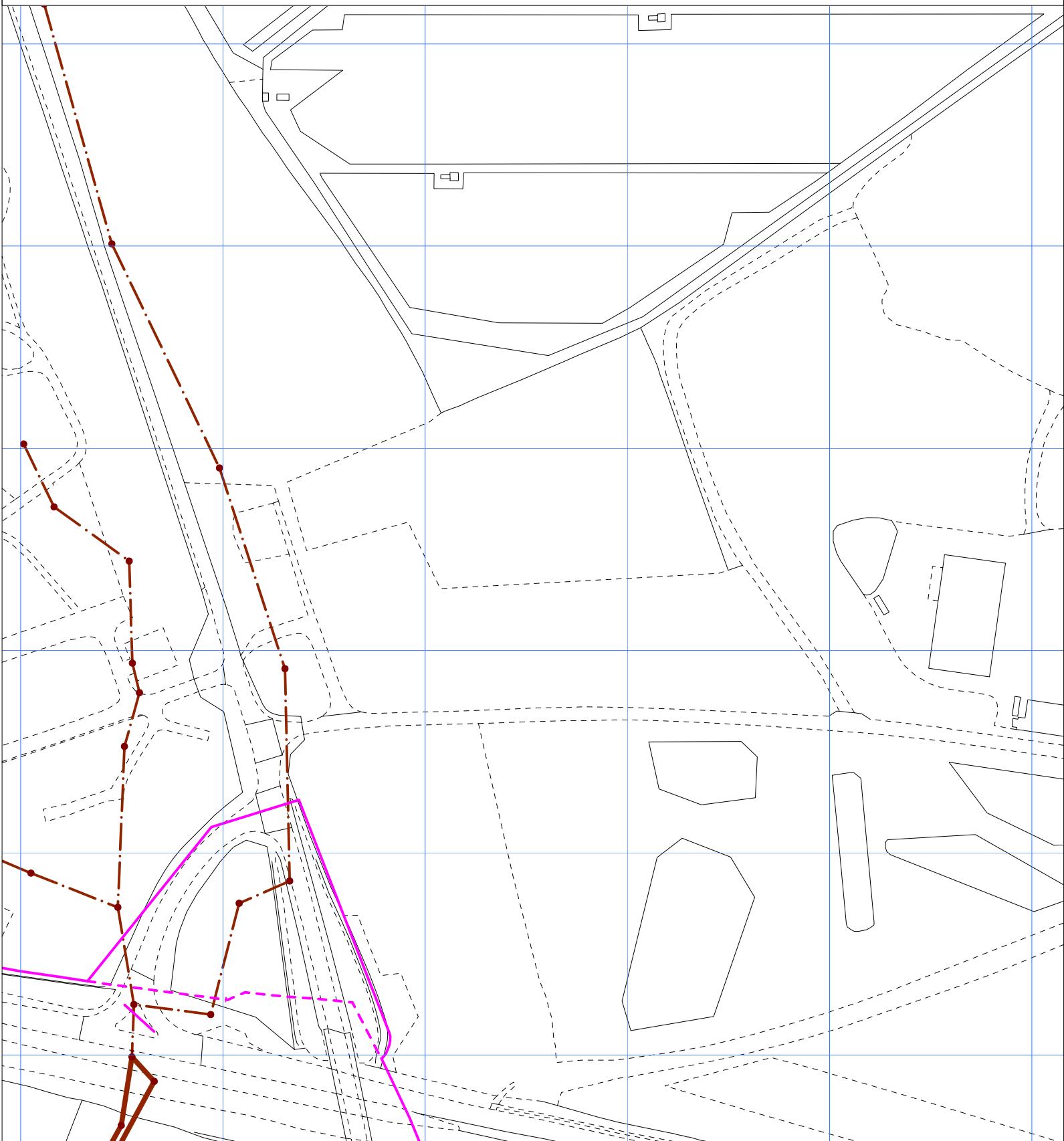
- demonstration of measures to be implemented to mitigate the future operational risk to groundwater sources.
 - potential substantial demand for water sources - assessment of risk of detriment to water supply sources and proposed mitigation measures.
- Southern Water's current sewerage/water records show that there is a public foul sewer within the proposed development site. No new development/building works will be permitted to be constructed over or within 3.0 meters of the existing 300mm foul sewer.
 - In addition due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer/s now deemed to be public could be crossing the above property.

If you require any further information please do not hesitate to contact our office on the above telephone number.

Yours Sincerely

[REDACTED]
Marta Karpezo
Developer Services

SOUTHERN WATER



The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

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O.S. REF: SU4342NE

Scale: 1:2500

Screen Print

WARNING: BAC pipes are constructed of Bonded Asbestos Cement

WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement



Printed By: kishoku

Date: 19-3-2019

Southern Water MapGuide Browser

Requested By:



FAO, Conor Rafferty
By email:
Environmentalservices@planninginspectorate.gov.uk

Planning and Building Service
Beech Hurst
Weyhill Road
Andover, Hants SP10 3AJ
Telephone 01264 368000
Minicom 01264 368052
Web site www.testvalley.gov.uk

Contact: Mrs Samantha Owen
Telephone: 01264 368181
E-mail: planning@testvalley.gov.uk
Your ref:
Our ref: 19/00513/SCON
Date: 21st March 2019

Dear Mr Rafferty

APPLICANT: WTI/EFW Holdings Limited
PROPOSAL: Scoping opinion under the Environment Impact Assessment Regulations 2017 - For the Wheelabrator, Hardwood Waste to Energy Facility
LOCATION: Waste-to-Energy Facility, Drayton Road, Barton Stacey, **BARTON STACEY**

Test Valley Borough Council (TVBC) has been identified by the Planning Inspectorate as a consultation body who must be consulted before adopting its Scoping Opinion. TVBC would like the following consultee responses to be addressed in any future Environmental Statement.

Highways – Traffic and Transport

It is stated that the proposed development site will be accessed from an existing access road which connects to The Street via a priority T-junction.

The development will be of a scale that the applicant will need to provide a full Transport Assessment (TA). This would fully assess the transport and highway impact of the proposed development, and identify suitable mitigation measures. The TA 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 will need to determine the number and type of vehicles serving the site, should review the latest available personal injury accident information for a five year period and set out suitable mitigation proposals.

If the applicant wishes to discuss the detailed scope of the TA please see the link below providing details of the Highway Authorities Pre-Application Highways Advice service.

<https://www.hants.gov.uk/transport/developers/highwaysdevelopmentplanning>

Environmental Protection – Air Quality, Noise, Ground Contamination

Air Quality

The scoping report covers air quality in section 7.3 and broadly I agree with the proposals.

With regard to the height of the chimney stacks (expected to be in the order of 90 – 100m), whilst it is generally right that good dispersion relies upon a high stack, and consequently the higher the stack height the lower the concentration of pollutants at ground level nearby, there may well be trade-offs in terms of stack height versus localised pollution. For this reason, it is important that a range of options be considered. In addition, it may be expected that improved emissions abatement may allow a lower stack height than would otherwise be the case. Therefore, options for improving emissions above and beyond the minimum requirements acceptable to the Environment Agency for environmental permitting purposes ought to be considered too.

The applicant proposes to undertake a diffusion tube survey for nitrogen dioxide close to the site to obtain some baseline data for nitrogen dioxide. This is welcomed however the inclusion of a survey, the proposed 3-month duration is too short to provide a good indication of levels. This is because levels vary across the year, typically with lower levels in the summer months than winter months, and so such a short average may not be representative of the annual mean level. In addition, the bias adjustment correction factor may not be available in time to correct the data. However, such a survey may well provide some helpful indicative data and, if the survey were commenced, it could always be extended if it were agreed that it would be beneficial to do so.

In paragraph 7.3.8, the report proposes to scope out an assessment of odour impact. I do not agree that a potentially significant impact arising from site-generated odours can safely be ruled out without an assessment. This is because it is not clear if there may be odour emitted either from the chimney stacks or from fugitive emissions from the site associated with the handling of waste materials. I request that an odour assessment be included in the EIA, having regard for the IAQM Guidance on the assessment of odour for planning.

For landscape assessment purposes, you may wish to request that the applicant predicts the height of the steam plume at its peak in cold weather, the variables involved with its prominence and whether it is capable of being reduced.

Noise

In terms of the general noise assessment principles expressed, I agree with section 7.5 on noise.

However, I would emphasise that, unless it is clear that the impacts would be very low indeed at all times, determining a representative background sound reference level is often critical, particularly for 24-hour industrial operations of this nature. More important than the absolute duration of the survey is that it is representative of the reasonably expected worst-case situation, taking account of the fact that weather conditions (particularly wind strength and direction), which can produce huge variations in background levels (potentially leading to very different result outcomes). The assessment should consider the worst-case and this is

often best achieved with a combination of attended and unattended measurements together with the collation of good weather monitoring data.

Ground Contamination

Covered in paragraph 7.8, the proposals for site investigation and risk appraisal appear appropriate.

Other Issues

The scoping report does not refer to the risk of flies or mosquitoes associated with the large-scale storage and handling of waste. I request that the potential for generating a nuisance relating to nuisance insects should be considered and assessed, presented with the recommendations from an expert.

Paragraph 7.10.22 refers to the impacts of lighting. This should cover all forms of potential nuisance and impact, including glare from light fittings and the avoidance of 'skyglow', the lighting up of the night sky which can impede a view of stars.

Archaeology and Cultural Heritage

Design and Conservation

The proposed site would consist of the principal building (at 55m in height), a number of smaller ancillary buildings, and two tower stacks at almost 100m. In paragraph 7.9.14 of the Scoping Report it is concluded that built heritage is scoped out of the ES. The LPA would not agree with this and would want the built heritage to be included in any future ES.

As existing, the majority of the site has not historically been developed (with the exception of some buildings shown on the mid 20thC mapping at the western side), and has principally been used for arable farming. It had been in MoD ownership following their purchase of it in 1943. There are no designated heritage assets within the site. The scoping opinion refers to the nearest listed buildings being the farmstead at Southside Farm (all GII), Church Farmhouse (the closest GII*) and St. Nicholas' Church (the closest GI). These are not marked on a map, and it is not wholly clear which these sites are (being common names). It is supposed the church is that at Longparish.

The key heritage consideration would be the visual impact of both the buildings and the towers on the setting of the historic environment. This should also extend to their potential influence on the public's perception, understanding and appreciation of heritage sites.

It is considered that a heritage appraisal would need to be submitted with an application for this development. This would need to consider a wider area than has been identified in the Scoping Opinion. It would need to demonstrate, if the applicants consider there would not be an adverse impact on the settings of the historic environment and the heritage assets within the Zone of Theoretical Visibility (ZTV) , how this conclusion has been reached, and what the assessment criteria were.

A study area of 1km around the site has been identified. This is not marked on the plans (the lines marked start at 5km). The report does not advise what the rationale behind the 1km boundary is. One of the buildings (the granary) at Southside Farm falls within the 1km area,

the rest of the farm has been excluded – though the impact of the development on its setting is likely to be similar to that of the granary.

It is not considered that the 1km boundary is sufficient, given the extent of the ZTV. Within the 5km boundary of the ZTV are the villages of Longparish, Barton Stacey, Bransbury and Upper and Lower Bullington. Chilbolton and Wherwell lie just outside the 5km boundary, but are also well within the ZTV. These settlements contain numerous listed buildings, including some which are highly graded. Many of these villages also have conservation areas. Design and Conservation defer to the County Archaeologist on the matter of the settings of the archaeological monuments.

Key receptors within the ZTV (such as churches, buildings with designed landscapes, village focal points, architecturally designed buildings, isolated farmsteads, and groupings of cottages) should be identified, and shown on a map. Representative photomontages from these receptors should then be produced and submitted. Consideration needs to be given to the time of year that the photographs for such photographs are taken, as clearly visibility in winter will be greater than when trees are in full leaf.

It is possible that many of the heritage assets may be screened from the proposed development by intervening topography, and existing trees, woodland, hedgerows and other natural features. The extent of visibility, and how intrusive it is into the view, as well as what contribution that view makes to the setting and significance of the heritage assets affected also needs to be taken into account. The findings of such assessments would need to be presented in the heritage statements to support the applicants' conclusions on whether the proposed development would have an impact on the historic environment.

It is suggested that, in order to give a clearer understanding of where the towers especially might be visible from, a barrage balloon could be flown, for an advertised fixed period, at the height of the towers' apex (or some other simulative temporary structure could be erected – such as a crane).

NB – the scoping does not show how the proposed facility would be connected to the grid. If this is to be done by pylons, these could have a significant potential visual impact.

Archaeology

I have had the opportunity to review the Scoping Report, and am pleased to note that the impact, both physical and visual (eg the setting of the two adjacent Scheduled Monuments), on archaeological sites. (para 10.2.1). It is clear that the physical impact will be assessed as will be the impact on the setting of the monuments using the ZTV (paras 7.9.21 and .22). I was surprised that the scoping study had not included data from the Hampshire HER but reassured to see that will be included in the evidence base for the EIA (para 7.9.17).

I am happy that archaeological issues are scoped in and that they are appropriate to be scoped in.

Landscape

The facility is shown to consist of the main building (55m in height) with two stacks approaching 100m in height and a number of smaller ancillary buildings within the site.

The site itself has no landscape designations, however there are a significant number of public rights of way and sensitive landscape areas in close proximity to the site including the North Wessex Downs Area of Outstanding Natural Beauty (AONB) which sits within 3.5km to the north.

Within the Environmental Statement a Landscape and Visual Impact Assessment (LVIA) will be required, forming part of the Environmental Impact Assessment (EIA). This current submission includes a ZTV, studying a radius of 30km around the site and highlighting the potential receptors; this will help inform and make the basis for the LVIA. A number of viewpoints have been shown, however these photos have been taken during summer months; in guidance with the GLVIA 3 when this assessment is undertaken for the LVIA it should be carried out during winter months when views are more open and deciduous trees are not in leaf.

Whilst these are huge and imposing buildings, a number of incinerators within the Hampshire and Southeast region have been designed to be architecturally interesting and attractive as far as it is possible for such large structures. The proposals put forward within this application show a huge box with no architectural merit and 55m in height; to break up the massing the pictures show the building to be painted in different colours. More emphasis is needed on the design of the building and how to break up the massing, there is potential to sink the structure into the ground, reducing the overall height and impact of the building.

Photomontages of the development will need to be submitted within the application to help assess the level impact the development will have, as the overall design is still yet to be finalised these could be shown as wireframe models, however it is important to gauge at an early stage how this will sit and be viewed within the landscape.

The report highlights that the site will take refuse from a 2hr perimeter of the site, the impact of these additional transport movements will need to be considered including potential junction amendments which maybe required to accommodate the additional traffic, this would potentially require additional lighting and urbanisation of the local and wider landscape.

Within the 5km radius, no assessment is shown to be undertaken from the A303 or A34 roads. Whilst these are not sensitive receptors, the development will be visually prominent and views will need to be considered.

The plume from the stacks will need to be considered, this should also include the various weather conditions and how the plume will be dispersed

Night time lighting will need to be assessed, due to the height of the building and the stacks it is highly likely that aviation warning lights will be required; if the roof of the main structures are curved translucent as with many industrial structures this may also provide further light spill. In conjunction with this security and operational lighting around the base of the buildings/structures and perimeter of the site will also need to be considered. Lighting can also potentially result in the flue and the plumes being illuminated and this would need to be considered.

The proposals will be seen across borough boundaries, whilst I am aware that Hampshire County Council are commenting upon the proposals it would also be beneficial to contact neighbouring authorities for comment.

Along with the building and chimney stack, it is important that the impact of the infrastructure for the development is also assessed within the EIA. It is anticipated that power lines and pylons will be required to transport the energy to wherever it is required, this will undoubtedly take a direct approach across the surrounding countryside impacting upon the rural landscape character.

Trees

Mature trees to road frontage of site backed by smaller trees, scrub. There is a small area of young deciduous woodland to northern boundary. Mature trees are located off site immediately to south of access road. The trees, most especially those to road frontage and to south of access road are of public amenity value.

Tree survey and impact assessment (in accordance with protocols set out within British Standard 5837:2012) will be required to quantify extent of existing tree cover, the constraints these would offer and the impact of the proposal upon the trees. This is necessary information which would help inform landscape VIA.

Priority should be given to retention of road frontage trees and vegetation. Where other tree loss envisaged, a statement of justification should be presented with accompanying proposals for new planting in mitigation.

Confirmation required that at the proposed height the chimneys will discharge is above a height where dispersal flow will be influenced by any potential top height of local trees. It is necessary to remove or manage pressure to top, or maintain trees below any particular maximum height.

Socio – economic and land uses

Paragraph 7.12.7 of the Scoping Report advises that Tourism will be scoped out of the future ES. This has been concluded on the basis that there is no large scale tourist infrastructure around the site. The Scoping Report concludes the closest tourism site is the North Wessex Downs AONB and South Downs National Park both of which are considered too far away to affect tourism revenues.

The LPA would disagree with this and would suggest this approach is too simplistic. Tourism is an important and growing sector of the Test Valley economy. It attracts 2.9m. day trips p.a. (2017), represents £195m worth of expenditure and supports more than 4,500 jobs.

The A303 represents the main artery for visitors from London and the south east heading west into Test Valley. The siting of a prominent industrial structure close to and within clear view of that road would be likely to have an impact upon the perception of Test Valley as a tourist location.

Test Valley's unique attraction is its river: The River Test – Hampshire's longest river – is world-renowned and is the home to dry fly trout fishing. The quality of the water and the landscape it sits within are incomparable. As well as the River Test there are many other tributaries and chalk streams that criss-cross the Borough, the River Dever is the closest to the site and is located just under a kilometre to the south of the site and supports a local trout fishery. Any potential threat to these streams unique quality could have a significant impact

on both the perception of Test Valley to visitors and to the local recreational fishing industry and the businesses which it supports.

In paragraph 7.2.15 it is stated that at peak construction phase up to 1000 personnel would be working on the site and the impact of these construction workers on local accommodation would be analysed. Whilst this is welcomed clearly the housing of these personnel could have an impact on the availability of visitor bed space within the Borough which could have a knock on impact on tourism.

It is considered that tourism should not be scoped out.

Planning Policy

It is considered appropriate to consult the relevant specialists to define the appropriate scope of the Environmental Statement, in the context of the submitted statement. The content of chapter 5 regarding the planning policy context is noted and there are no comments on additional policy documents for inclusion at this stage.

Ecology

Ecology comments will be provided by Hampshire County Council who will be responding separately to this Scoping request. If however this is not received or covered I would appreciate the ability to comment on this aspect.

Authorised under Delegated Powers

Head of Service Signed.....
Date 21/3/19

Dear Richard,

Thank you for your email dated 28th February 2019. Your email has been passed on to the Development Management Team and I have been asked to respond.

We have become aware of the proposal in our capacity as a neighbouring authority and are continuing to build up an understanding of the scheme.

We are aware that the Wheelabrator Harewood Waste to Energy Facility EIA scoping report dated February 2019 is currently out for consultation with a deadline for comments being Monday 25 March 2019.

I have reviewed the document which sets out the topic areas and proposed contents for the environmental statement (ES). These appear to cover all the aspects of the scheme that would be of interest to us as a neighbouring authority.

Accordingly, at the present time we have no further comment to make.

Regards

Steve Cornwell

Winchester City Council