

and landscape and visual chapters of the PEIR and therefore the limitations of those assessments also apply to the information as used in this chapter. As most of these assessments are incomplete, the conclusions drawn in the health assessment cannot be relied upon.

Noise and Vibration

- 3.18 Again, the noise assessment is based on design information available at the time of writing the PEIR. It is not clear, at what point in the design evolution of the scheme, the assessment was completed and therefore precisely what has been assessed.
- 3.19 It is somewhat surprising that baseline noise surveys have not even been completed to inform the PEIR. Similarly, it is noted that baseline traffic flow along the surrounding road network was also unavailable at the time of writing the report.
- 3.20 In addition to the lack of baseline data, no information was available to inform the assessment on the proposed plant installations and internal noisy activities or associated sound level data and no topography data was available for land outside the site boundary towards the identified sensitive receptors.
- 3.21 Given the stated limitations of the noise and vibration assessment, what appears to have been provided is a very generic assessment of an incinerator rather than an assessment of the proposals on the Harewood site. The conclusions of the assessment cannot therefore be relied upon and suggest that the applicant was premature in undertaking the Stage 2 consultation.

Biodiversity

- 3.22 Given that traffic and air quality surveys are yet to be completed, the PEIR acknowledges that it is not possible to undertake a full assessment of the likely air quality changes during construction and operation of the proposed development.
- 3.23 A number of important areas of survey have not been completed including analysis of bat activity survey data (the site could provide forage value to this group of bats in particular the Barbastelle which has internationally important populations in the Test Valley) and the dormouse survey, the results of which are incomplete.
- 3.24 The breeding bird survey under play its value, with good populations of Red and Amber listed farmyard birds being dismissed as 'common and widespread'. The PEIR is silent on the presence of Stone Curlew in the vicinity of the site which is a significant omission given that it is a rare breeding bird in the mid-Hampshire chalk and highly sensitive to disturbance.
- 3.25 Construction impacts are then assessed as temporary (5-10 years) and therefore not significant. This is questionable and based on inadequate information.
- 3.26 A major omission is an assessment of the value of the site for wintering birds. Further survey is required to assess the value of the site for them.
- 3.27 There is no assessment of air quality impacts on protected habitats and sites, which is a very significant omission. The PEIR acknowledges that the proposal could impact on sites

- and habitats of national importance, however, the baseline assessment undertaken has not collated existing habitat survey data from these protected sites – in particular the vulnerable fen and mire habitats in Bransbury Common SSSI and East Aston Common SSSI. Despite this, the PEIR states; *“at the River Test SSSI the scheme will result in a large increase in acid deposition (defined as an increase of more than 10% of the critical load). The implications of this will be discussed in the ES chapter”*. The admission that the critical loads for N deposition are already exceeded at the other SSSI is also of major concern.
- 3.28 The biodiversity assessment makes no mention of impacts of the development on water quality. Both construction and accidental impacts could have major implications for water quality in the Test aquifer and the lack of any discussion of this potential impact pathway is a major omission from the PEIR.
- 3.29 Again, the PEIR is silent on the impact of the development on water resources. However, there is a significant debate about impacts of current levels of abstraction and with predicted climate change this could become even more acute. Placing this additional burden on an already heavily abstracted aquifer needs to be very carefully assessed and the failure to address this issue is a major omission from the biodiversity chapter of the PEIR.
- 3.30 The PEIR has a number of important omissions in both the baseline evaluation and assessment stages as summarised below.
- 3.31 Zones of Influence for the assessment are drawn too tightly and fail to appreciate the wider effects of the development on mobile and migratory species, in particular birds, bats and fish.
- 3.32 This lack of a wider perspective is carried through into the ecological surveys that have been undertaken. These again fail to consider the wider impacts of the proposed development, this result, in particular to;
- insufficient survey effort to assess impacts on bats and especially the barbastelle bat.
 - lack of information on the presence of habitats of European importance in SSSI within 2 km of the proposed development.
 - Poor assessment of the impacts of the proposed development on breeding farmland birds of conservation concern.
 - No consideration of the impact of the development on wintering farmland birds.
 - No assessment of the impact of the proposed development on breeding Stone Curlew or the potential implications of this for the Porton Down SPA.
- 3.33 In addition, the PEIR chapter on biodiversity provides no assessment of the impact of changes to air quality, from both road traffic and stack emissions, on habitats of acknowledged national and international importance.
- 3.34 No assessment has been undertaken of the implications of the proposed development on water resources or water quality, in particular impacts on the River Test SSSI. These are fundamental omissions which prevent consultees from considering very important implications of the proposal.
- 3.35 Further technical comment on the biodiversity chapter is included as an appendix to this report.