

- misleading and it follows that the conclusions of the assessment are inaccurate as they do not represent the worst case.
- 3.79 The assessment in the PEIR is also deficient in that it does not include information on lighting and it is not clear what assumption has been made regarding the use of solar panels or indeed, whether the inclusion of solar panels has even been assessed as they are not shown on any of the plans.
- 3.80 It is noted that the assessment claims advantage of the benefits of reducing the height of the buildings by excavating up to 50,000m³ of material, but does not include any assessment of the impact of depositing this material on the laydown area on landscape character or views or transporting it off site.
- 3.81 It is not clear why the Rochdale Envelope considers the operation at year 15 during summer when the plume is not visible as representing the worst case (see PEIR paragraphs 14.343 – 14.344). Clearly, this is the best case. The worst case for future operation would be at year 15 during the winter with the plume visible.
- 3.82 Further technical comment on the landscape and visual impact assessment is included as an appendix to this report.

Climate Change

- 3.83 It is noted that a number of assessments are still outstanding which begs the question as to whether the consultation bodies can make meaningful comments at this stage.
- 3.84 It is not considered appropriate to rely on policy from 2010-2015 for direction. Statements made in 2010 have little weight in the current climate. Both Hampshire County Council and Test Valley Borough Council have declared a climate emergency and are proposing measures to eliminate their carbon footprint. This should be acknowledged and addressed in the submitted application.
- 3.85 The Green House Gas (GHG) assessment methodology refers to details of the Waste to Energy (WtE) design, together with generic information on the characteristics of the waste fuel and the energy and materials recovered at the plant, as being used to populate the Defra framework. As the design of the facility is not fixed, further information is required on precisely what has been assessed to ensure that it represents the worst-case scenario and the conclusions are sufficiently robust.
- 3.86 Further information is required on the characteristics of the waste fuel expected to be recovered at the plant, rather than the use of generic information.
- 3.87 In terms of the assessment of likely impacts and effects, further justification is required to support the assumption that 500,000 tonnes of residual waste would otherwise be landfilled. The consultation material circulated by Wheelabrator makes it clear that this residual waste is either landfilled or exported overseas. The assumptions used in the GHG assessment that it is all landfilled is not therefore accurate or reasonable and the conclusion that the WtE facility delivers a net reduction in GHG emissions is certainly not robust.
- 3.88 It is noted that the sources of residual waste and alternative landfill destinations are not

known with sufficient certainty to allow GHG emissions from transportation to be calculated with any precision. This information needs to be provided in the submitted application.

- 3.89 The choice of the site next to a solar farm, will undoubtedly have an impact on the amount of energy generated by the solar farm. This needs to be considered as part of the climate change assessment.
- 3.90 NPS EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account to help ensure that electricity networks infrastructure is resilient to climate change. Applicants should set out to what extent the proposed development is expected to be vulnerable, and, as appropriate how it would be resilient to climate change including earth movement or subsidence caused by flooding or drought (for underground cables). This should be taken into account as part of the assessment of the grid connection.

Socio-economic

- 3.91 The study area of 2km for the impact on recreation facilities is inadequate given the proposed incinerator will be visible from public rights of way at greater distances.
- 3.92 Public rights of way should be included on Figure 16-1 as a recreation/tourism receptor.
- 3.93 No consideration appears to have been given to tranquility which is something that currently draws visitors to this part of the Test Valley and is likely to be adversely affected by the proposed incinerator.
- 3.94 The River Test is world famous for trout fishing. This needs to be acknowledged and an assessment undertaken of the likely impacts of the proposal on fishing given the potential impacts on water quality. The impact on the perception of the Test Valley as an unspoilt, tranquil area within which to fish needs to be factored into any assessment.
- 3.95 Again, it is noted that traffic flow data along the surrounding road network is not available and has therefore not been taken into account in the assessment. No reliance can be placed on the conclusions of the assessment at this stage.

Other issues

- 3.96 The Scoping Opinion requires an assessment of 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.
- 3.97 The PEIR recognises that there is an inherent risk of both fire and explosion associated with the proposed development. No assessment has been made of the implications of such an event on traffic on the A303, which passes in close proximity to the site.
- 3.98 Consideration also needs to be given to the implications for the facility and surrounding receptors in the event of a major accident on the A303.