

- 3.8 NPS EN-1 makes it clear that projects with significant transport implications should include a transport assessment using the WebTAG methodology stipulated in Department for Transport guidance. This requires a detailed consideration of alternatives in transport terms.
- 3.9 The fixing of a peak hour assessment pre-supposes that all worst-case impacts occur at peaks of highest overall traffic flows. This is not true for environmental impacts where the proportional impact of development traffic against what might be a lower base flow could be higher.
- 3.10 Further technical comment on the traffic and transport chapter is included as an appendix to this report.

Air Quality

- 3.11 It is noted that the data in the PEIR is subject to change once the design has been confirmed following Stage 2 consultation. Whilst this is not unusual, what is very disturbing is that the information required to complete the assessments based on the design as it currently stands is incomplete. Little reliance can be placed upon it.
- 3.12 The PEIR notes at paragraph 7.41 that the modelling of the proposed development has been based on the previous summer 2019 design iteration illustrated in Figure 5-2. It is not clear from Figure 5-2 precisely what has been assessed as the drawing does not provide any information on the height of the stack or the height of the buildings at summer 2019. Whilst the PEIR makes it clear that the massing and size of the main building and the ACC have been reduced compared to the design in the assessment, further information is required to understand precisely what was assessed. The assessment presented in the PEIR is not of the proposed scheme and is not, therefore sufficient to be able to understand the likely environmental effects of the proposal.
- 3.13 It is also noted that no information is available on the impacts of atmospheric emissions from road traffic. This is another significant omission which brings into question the validity of any assessment outcomes.
- 3.14 It is clear that the air quality sections of the PEIR are incomplete and not sufficient to understand or adequately assess the air quality effects of the scheme. The PEIR reaches a conclusion of 'not significant' despite presenting evidence which does not support this conclusion. It is highly concerning that conclusions have been reached and reported prior to the required assessment being carried out. The conclusions should be disregarded until such time as they can be supported by a robust air quality assessment.
- 3.15 Further technical comment on the air quality chapter is included as an appendix to this report.

Health

- 3.16 It is not clear how the conclusions on health impacts have been reached when the Human Health Risk Assessment is still to be produced.
- 3.17 As is made clear in paragraph 8.14, the health assessment draws from the technical outputs from the air quality, noise and vibration, transport, ground conditions, biodiversity

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