



Wheelabrator Harewood Waste to Energy Facility

Heritage Review of Preliminary Environmental
Information Report (PEIR)

On behalf of
Keep Test Valley Beautiful

GLA-312
November 2019

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1.0 Introduction

- 1.1 This report constitutes a heritage review of the content of a Preliminary Environmental Information Report (PEIR) that has been submitted for consultation under Section 42 of the Planning Act 2008 (as amended) in respect of the proposed development of the Wheelabrator Harewood Waste to Energy Facility on land adjacent to the existing Raymond Brown waste processing facility at the A303 Enviropark between the villages of Longparish and Barton Stacey, near Andover, Hampshire. The proposal is being brought forward by WTI/EfW Holdings Ltd. hereafter referred to as the Applicant.
- 1.2 This report has been prepared on behalf of the Keep Test Valley Beautiful group (KTVB), by Grover Lewis Associates Limited, a specialist historic environment consultancy. It has been written by Philip Grover BA (Hons), BTP, Dip Arch. Cons., MRTPI, IHBC. The author has extensive experience of undertaking heritage impact assessment for a wide range of developments and has successfully acted as an expert witness on heritage planning matters. This review has been prepared in order to provide a view of the heritage issues that will need to be addressed by the Applicant.
- 1.3 Consent is being sought for the 65-megawatt (MW) waste to energy facility on the basis of the 'Rochdale Envelope' approach, namely where overall parameters in terms of scale are defined, but the detailed design is yet to be confirmed. Based on the parameter information and illustrative plans provided in Chapter 4 of the PEIR, the maximum envelope of the proposed development will comprise a main facility block of up to 46m in height, a block housing the air-cooled condenser and turbine of up to 30m in height, and two emission stacks of up to 80m in height.
- 1.4 No formal application has been submitted, but and at this point the Applicant has initiated their formal Stage 2 consultation, allowing the host local authorities and other stakeholders to comment on the emerging proposals contained in the Preliminary Environmental Information Report (PEIR). The PEIR has been prepared on behalf of the Applicant by AECOM. It is understood that a further opportunity for consultation (Stage 3) will follow in due course when the developer submits a draft Environmental Statement (ES).
- 1.5 It should be noted that the PEIR does not constitute a full Environmental Statement (ES) at this stage, but will become so as part of the Development Consent Order (DCO) application. The required content of PEIR

documentation is set out in Regulation 14(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. These stipulate, amongst other things, that PEIR *'is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development'*.

- 1.6 The introduction to Chapter 13 of the PEIR explains that it is intended to provide consultees with an early opportunity to give informed comments on the assessment work carried out to date and its findings. At paragraph 13.2 of the report it is explained that the various assessments are at differing stages of completion, and that in some areas there are gaps in information. Consequently, this review is necessarily of a preliminary nature. A more thorough critique will be possible when more detailed information, including photomontages, is supplied by the consultants working on behalf of the applicant

- 1.7 This report reviews the information submitted in October 2019, namely Chapter 13 of the PEIR and its Appendix 13-1 Heritage Desk-based Assessment, and provides a review of the methodologies used to assess the impact of the proposed development on heritage assets in the area. It assesses the adequacy and accuracy of baseline information submitted to date, in terms of the identification of designated and non-designated heritage assets and their settings. It also assesses the sufficiency of the supporting information provided as a means of properly assessing impact on settings of heritage assets.

2.0 Decision-making context

- 2.1 In assessing any impact that the Wheelabrator Harewood Waste to Energy facility would have on the settings and significance of heritage assets within the area, the Secretary of State, as decision-maker in this instance, advised by the Planning Inspectorate, will need to have regard to relevant statutory provisions, central government policy and relevant guidance.

Relevant legislation

- 2.2 In relation to built heritage assets, the relevant legislation is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 (1) of the Act 1990 makes it a statutory duty for a local planning authority, or, as in this case the Secretary of State, in considering whether to grant planning permission for development which affects a listed building or its setting, to *“have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*.
- 2.3 The courts have held that “preserving means doing no harm” and have established that, where a proposal would cause some harm, the desirability of preserving listed buildings and their settings should not simply be given careful consideration, but should be given *“considerable importance and weight”* when the decision-maker carries out the planning balance.
- 2.4 The relevant statutory duty relating to development within conservation areas is contained in Section 72 of the Act, which states that, in the exercise of a local authority’s planning functions, *“with respect to any buildings or other land in a conservation area ... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*
- 2.5 Legislation covering the protection of Scheduled Monuments is contained in the Scheduled Monuments and Archaeological Areas Act 1979.

National Planning Policy Framework

- 2.6 Section 16 of the National Planning Policy Framework (NPPF) sets out Central Government policy on development affecting the historic environment. The policies in section 16 of the NPPF refer to the concept of a heritage asset, which is defined as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing’). (Annex 2: Glossary).

- 2.7 The policies in section 16 of the NPPF place an emphasis on significance, which is defined in Annex 2 of the NPPF (Glossary) as *‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’*.
- 2.8 The NPPF Glossary defines the setting of a heritage asset as *‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’*.

Relevant Guidance

- 2.9 Relevant guidance includes the Government’s online National Planning Policy Guidance (PPG). The PPG stresses the importance of understanding the potential impact of development proposals on significance (paragraph: 007 Reference ID: 18a-007-20190723) and that understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm (paragraph: 008 Reference ID: 18a-008-20190723). The PPG goes on to advise that applicants’ assessments of significance should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals (Paragraph: 009 Reference ID: 18a-009-20190723).
- 2.10 With regard to ‘setting’, the PPG notes that whilst the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations, setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. It also makes clear that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting (paragraph: 013 Reference ID: 18a-013-20190723).
- 2.11 Also relevant is a series of Good Practice Advice (GPA) notes published by Historic England. Of particular relevance in this instance is the advice contained in GPA3: *The Setting of Heritage Assets (second Edition, 2017)*.

2.12 GPA3 provides a framework for the assessment of proposed changes to the setting of a heritage asset. It gives helpful and up to date advice that provides clarity and detail to the understanding of the concept of the *setting* of a heritage asset. In order to assess the degree of potential harm to the significance of a heritage asset, GPA3 advises a five-step approach:

- Step 1: Identify which heritage assets and their setting are affected
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: Assess the effect of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

2.13 Steps 1-4 of GPA3 are clearly of relevance in the case of the current proposal for the Wheelabrator Harewood Waste to Energy facility. The observations in this review follow the staged approach set out in GPA3.

3.0 Methodology of assessment in the PEIR

- 3.1 As a basis for informed decision-making on the emerging proposals for the Weelabrator Harewood Waste to Energy Facility a Preliminary Environmental Information Report (PEIR) has been prepared by AECOM on behalf of the Applicant. This sets out information in respect of a number of topics including archaeology and heritage.
- 3.2 The assessment of archaeology and built heritage is contained in Chapter 13 of the PEIR. That document is underpinned by a Cultural Heritage Desk-based Assessment (PEIR Volume II Appendix 13-1) which, amongst other things, sets out the heritage baseline conditions prior to the development. The document also sets out the methodology that is used for assessment of significance of heritage assets. The Desk-based Assessment is supported by technical information including a gazetteer of all of the designated heritage assets within the 15km search radius of the application site, together with mapping showing the location of assets, and photographs of the site.
- 3.3 Chapter 13 of the PEIR reports the preliminary findings of an assessment of the likely 'significant effects' of the proposed waste to energy development on cultural heritage (archaeology, historic landscapes and built heritage). It explains the methodology used to assess the impacts and effects on the cultural heritage resource.
- 3.4 In general terms the methodologies outlined in the PEIR follow the pattern frequently adopted for such reports involving environmental impact assessment (EIA). The methodology adopted in the PEIR is simplistic, but standard for this kind of assessment.
- 3.5 The criteria for assessing the impact of the proposed development on the significance of heritage assets is determined by a sequence of assessments set out in three tables. These combine (i) the criteria for determining the value of the heritage asset (Table 13-2), with (ii) the criteria for determining the magnitude of impact (Table 13-3), and (iii) the resulting interaction of value and magnitude in terms of the level of significance of effect (Table 13-4).
- 3.6 Based on the overall PEIR methodology set out in *Chapter 2: Assessment Methodology and Significance Criteria* the following criteria are applied for determining whether or not an effect is 'significant':
 - 'Moderate' or 'major' effects are deemed to be 'significant'

- 'Minor' effects are considered to be not 'significant' (although they may be a matter of local concern) and
 - 'Negligible' effects are considered to be 'not significant'
- 3.7 Whilst such a matrix-based approach is commonplace for this kind of assessment, its formulaic nature can, if incorrectly applied, lead to unreliable results. To be reliable as a basis for assessing impact on heritage assets, the methodology described above needs, from the outset, not only to accurately and correctly record the overall significance of the assets with regard to their architectural/artistic, historic or archaeological value, but also to accurately define the settings of the heritage assets in question, and crucially the contribution that setting makes to significance.
- 3.8 A matrix-based approach is not a substitute for a systematic, professional assessment of likely impacts, supported by well-chosen photomontages and wireframes. As explained in Historic England's GPA3, technical analysis of this type should be seen primarily as material supporting clearly expressed non-technical narrative argument that sets out 'what matters and why'. This is particularly important in cases, such as the Harewood Waste to Energy facility, where there are no direct physical impacts, and where any impacts will be on the settings of heritage assets.
- 3.9 At the outset it is vital for assets to be ascribed the correct level of importance within the tables, and then for an accurate calibration of impact to be assessed. If the significance of a heritage asset is under-valued, and the contribution that setting makes to its significance under-estimated, there is an inevitable consequence of heritage impact being under-estimated.
- 3.10 An example of how this seemingly systematic methodology can be subjective and inconsistent, and can potentially suppress the result of an assessment, is well-illustrated in the case of Barton Stacey Conservation Area. The rather simplistic table 13-2 in the PEIR defines only four levels of heritage value 'High', 'Medium', 'Low' and 'Very low'. The highest category includes '*Conservation Areas of demonstrable high value*' (a calibration that has no statutory definition and is rarely, if ever, used in practice), whereas the 'Medium' category includes '*Conservation Areas*'.
- 3.11 Longparish Conservation Area is defined in the assessment in the PEIR as falling into the 'High' category of significance, but Barton Stacey Conservation Area, for reasons that are entirely unclear, is only defined as a 'Medium' value heritage asset. Although the assessment considers that the proposed development will introduce '*an incongruous element into the setting of the conservation area*', the assessment concludes that the impact would be

'Low'. When fed into the matrix, the effect is assessed as a 'Low' impact on a 'Medium' value asset, resulting in a 'Minor' adverse effect, which is not considered 'significant' according to the criteria outlined above. Had Barton Stacey Conservation Area been defined as a 'High' value heritage asset as Longparish Conservation Area, the outcome would have been different, namely it would have been assessed as a 'Low' impact on a 'High' value heritage asset, resulting in a 'Moderate' effect, and thereby deemed to be 'significant'.

4.0 Settings of heritage assets and likely impacts

- 4.1 There are no designated heritage assets (listed buildings, conservation areas, scheduled ancient monuments and registered parks and gardens) within the site area of the proposed energy to waste facility, and therefore there would be no direct physical impact on such heritage assets. The PEIR Heritage Desk-based Assessment identifies 134 listed buildings, 4 conservation area and 1 registered park and garden within a 5 km radius of the application site.
- 4.2 The large scale of the proposed waste to energy facility is such that the setting of some heritage assets in close proximity to the development would suffer adverse impacts. It is considered that designated heritage assets within a 2km range are most likely to be affected.
- 4.3 The conservation areas of Longparish and Barton Stacey, together with listed buildings within those settlements are amongst the most likely heritage assets to be affected. The cluster of listed buildings in Bransbury and a more scattered range of listed buildings and other designated heritage assets within a 2km range are also likely to be affected. The application proposal could also have an impact on the non-designated heritage assets in the area, for example unlisted historic buildings that contribute to the character and appearance of conservation areas, as defined in Test Valley Borough Council's conservation area character appraisals.
- 4.4 Although, as pointed out in the assessments in Chapter 13 of the PEIR, the village of Longparish lies in the shallow valley of the River Test, and there is significant mature tree cover, the settlement's linear nature and the existence of open area between its component elements, means that there is potential for adverse impacts throughout the conservation area. At Barton Stacey, the elevated nature of the settlement makes it vulnerable to adverse impact on its setting.
- 4.5 As outlined above, the key consideration in relation to indirect impacts is to identify the contribution that setting makes to significance of any particular heritage asset. It is made clear in Central Government and Historic England guidance that appreciation of setting does not rely on their being public access to the asset in question. A range of heritage assets and key views where more detailed analysis of impacts needs to be undertaken is identified in the succeeding sections below. This should not be regarded as a definitive list, rather an indication of key assets and views that warrant closer scrutiny.

5.0 Sufficiency of assessment & gaps in information

- 5.1 This section reviews the sufficiency of the heritage assessment contained in the PEIR. This includes a review of the baseline assessment of heritage significance (including the contribution made by setting) contained in *Appendix 13-1: Desk Based Assessment* and the assessment of heritage impacts contained in Chapter 13 of PEIR. It also refers to the photographic information provided in support of the Landscape and Visual assessment within the PEIR (Chapter 14).

Baseline analysis of settings of heritage assets

- 5.2 As outlined above, proper assessment of impact on heritage assets will depend upon an accurate and reliable assessment of significance, which includes appropriate weight being given to the contribution that setting makes to significance. Indeed, in cases such as the current application where any impact will be indirect, definition of the setting of an asset and its contribution to significance is a vital component.
- 5.3 Review of the baseline assessment in Appendix 13-1 reveals that, in the case of some heritage assets, little or no evaluation of setting has been provided. In other cases, only minimal description of setting has been given. Even where described, there is no discussion about the contribution that setting makes to the significance of the asset in question. Therefore, the assessment, as it stands does not provide an adequate basis for an understanding of the potential impact that the proposed development will have on the significance of the assets under consideration. The under-rating of the contribution that setting makes to significance would have the inevitable effect of down-playing any adverse impact that the proposed development would have on the significance of the heritage assets concerned.
- 5.4 This deficiency is especially evident with regard to conservation areas, where the assessments of setting are very superficial, or non-existent. For example, in the case of Barton Stacey Conservation Area (Appendix 13-1, paragraph 5.1.2.1), there is a complete absence of a description of the immediate and wider landscape setting of this rural settlement, let alone any form of assessment of the contribution that this might make to significance of the conservation area. This is particularly important, bearing in mind that, at approximately 1.6 km from the application site, this conservation area is one of the closest heritage assets to the proposed waste to energy facility. It should be noted that at paragraph 1.1 of the Desk-based Assessment it is erroneously asserted that the application site is 3.6 km from Barton Stacey.

- 5.5 In the case of Longparish Conservation Area (Appendix 13-1, paragraph 5.1.2.2), the setting is superficially described as being ‘enclosed’. There is no meaningful analysis of the setting and no attempt at evaluation of the contribution that setting makes to the significance or the character and appearance of this rural conservation area. The description of setting states that *the bottom of the valley in which Longparish sits is at ‘an elevation of approx. 58m AOD while the ridges on either side rise to approx. 120 m’*. Reference to the 120 m ridge heights in this context is somewhat misleading since this height is only achieved well to the east of the application site, which sits at a much lower level.
- 5.6 With regard to the grade II listed Middleton House, which lies within the Longparish Conservation Area, whilst the assessment recognises that the house retains a large part of its former parkland setting, there is no attempt to describe how this and the building’s wider setting contribute to its significance. There is also no discussion of how this landscape setting relates to the building’s contribution to the character and appearance of the conservation area. This is particularly relevant, given that the key views from Middleton House in the direction of the application proposals are specifically identified as important views on the map that accompanies the conservation area character appraisal.
- 5.7 Longparish House is a Grade II* listed building within the Longparish Conservation Area, but no more than a cursory mention of this highly-graded heritage asset is given, and certainly no assessment of the significance of the setting of the building is provided. In addition, there is no reference to the open landscape that surrounds Longparish House, and its setting within the conservation area. Neither is there any reference made to the availability of views from footpaths within the conservation area, looking from Longparish House in the direction of the proposed development, or views from higher ground to the north of the listed building, in which it is most likely that the application proposals will be visible in tandem with the house.
- 5.8 A cluster of listed buildings is located in the small rural settlement of Bransbury, which lies approximately 1.8 km from the application site. Paragraph 5.1.4.5 of Appendix 13-1 makes the generalised statement that the settlement *‘retains its rural setting which contributes to the significance of assets within it’*, but does not analyse this in sufficient detail to provide an adequate basis for subsequent assessment of impact.
- 5.9 The Andyke is a Scheduled Monument, and is amongst the closest of all of the heritage assets to the application site. This substantial, linear earthwork ditch and bank feature runs roughly north-south, and is crossed near its northern end by the A303. The area to the north of the A303 is not visible

above ground level. A generalised description of the setting of this heritage asset has been provided at Appendix 13-1, paragraph 5.1.1.7, which explains that the monument's setting is '*the valley of the Dever and the wider prehistoric funerary settlement landscape of the Hampshire chalk downlands in which the Site is located*'. However, this is limited in scope, and in insufficient detail to provide an adequate basis for subsequent assessment of impacts on this important heritage asset.

- 5.10 The baseline assessment in Appendix 13-1 highlights at paragraph 5.1.4.8 that there are isolated listed buildings within the study area that do not lie within a conservation areas or small settlements. An example of this is the grade II* Church Farmhouse and Garden Wall to the west of Barton Stacey, which lies just 1.6 km from the proposed development site. Remarkably, the setting of this highly-graded heritage asset, which is located in close proximity to the development site, only receives the most cursory of discussions in paragraph 5.1.4.8 of the Desk-based Assessment. The impact on the setting of the listed building is, however, assessed at paragraph 13.141 of Chapter 13 of the PEIR, where it is considered that the proposed development would introduce '*an incongruous element into the asset's setting*' leading to a significant adverse effect.
- 5.11 In summary, a more detailed and refined assessment is needed in relation to the settings of designated heritage assets, and in particular the contribution made by setting to their significance. This is particularly the case with regard to heritage assets in close proximity to the application site and likely to be affected by the proposed development, i.e. conservation areas at Longparish and Barton Stacey, listed buildings within those settlements and other, isolated heritage assets within a similar geographical range.

Absence of photomontages and wireframes

- 5.12 As part of the information supporting the Landscape and Visual assessment within the PEIR (Chapter 14) a series of landscape photographs have been prepared. However, no wireframes or photomontages have been prepared at this stage. It is explained in Table 13-1 in Chapter 13 of the PEIR, which deals with matters raised at consultation, that these will be prepared for the ES. Nevertheless, Chapter 13 of the PEIR contains an assessment of likely impacts on the significance of heritage assets. It is difficult to see how, in the absence of accurately constructed photomontages, or at the very least verified wireframe images, any meaningful conclusions can be reached on heritage impacts. A full set of photomontages and wireframes must be prepared to enable stakeholders to properly understand the impact of the development on heritage assets.

- 5.13 A number of photographs have been taken from a range of viewpoints in support of the Landscape and Visual Assessment. It is understood that these will, in due course, be used as a basis for photomontage and wireframe views in the ES. However, only a limited number of these have been taken to show views from and including heritage assets, e.g. some views within the Longparish and Barton Stacey Conservation Areas, and a very limited number in relation to individual heritage assets. Where photographs of views relating to heritage assets have been provided, these views do not necessarily reflect the optimum views relating to the assets in question, and the rationale for their selection of viewpoints is not clear. A number of views are included below. It should be noted that these are intended for guidance purposes only, and do not purport to be photographically 'correct' as a basis for photomontages or wireframe analysis.
- 5.14 In the case of Longparish Conservation Area, the viewpoints do not always appear to have been selected to reflect the key views identified within the Longparish Conservation Area Character Appraisal, or indeed from positions that are most important in terms of the settlement's relationship with its landscape setting. For example, the view looking southeast from the slightly elevated land at Middleton House, across its parkland towards the proposed development has not been included. This is one of the key open spaces within the conservation area, and one of the key vistas in Longparish. It embraces the tower of the grade I listed medieval parish church of St Nicholas and grade II listed 18th century Granary. (see Plate 1).



Plate 1: View looking southeast from the slightly elevated land at Middleton House, across its parkland towards the proposed development.

- 5.15 A view has been selected in the vicinity of the grade II* Longparish House (RV20). Whilst this does coincide with one of the views identified on the map associated with the Longparish Conservation Area Character Appraisal, it only provides a limited 'snapshot' of just one amongst a wide range of important views that are available from the vicinity of this highly-graded heritage asset, and whose open landscape surroundings are so important to the character and appearance of this part of the conservation area. For example, there is no photograph from the grounds immediately to the southeast of the house, nor from the public rights of way within the open landscape between the house and the River Test (see Plate 2). Nor are there any photographs from permissive footpaths rising to the slightly elevated land to the north of the house, where it is most likely that views of the proposed development would be seen in tandem with the house, and across the conservation area.



Plate 2: View from one of the public rights of way within the open landscape between the house and the River Test

- 5.16 In relation to Barton Stacey Conservation Area only one viewpoint has been selected (RV10). The photograph provided does not coincide sufficiently closely with the key views identified on the map within the conservation area appraisal, which takes in the view over the landscape to the north of the village. Similarly, there is no photograph taking in the views looking northwards towards the application site from The Street, which leads north out of the village (see Plate 3). Another important view is available from the slightly elevated position looking out of the conservation area towards the application site from within the churchyard of the grade II* church of All Saints.



Plate 3: View looking northwards towards the application site from The Street leading northwards out of the village in the vicinity of the grade II listed Yew tree Cottage with the listed Granary in the background.

- 5.17 There are no photographs embracing heritage views within the small settlement of Bransbury towards the application site, taking in the setting of listed buildings. An important view is available within the centre of this settlement, immediately in front of the driveway to the grade II listed Bransbury Manor, with its separately listed wall and adjacent listed farm building, looking east-northeast in the direction of the application site, taking in the grade II listed 'The Barracks' (see Plate 3). A photomontage or wireframe view from this position would help to determine the likely impact that the proposed development would have on the setting of these designated heritage assets.
- 5.18 Similarly, there are no photographs of the Andyke Scheduled Monument, embracing views of the landscape setting looking towards the application site. A series of views of this monument are available to users of the public right of way running eastwards from Bransbury, that begins as Crook and Shears Lane and becomes a footpath. Plate 4 is a view from the footpath, looking east-northeast in the direction of the application site, taking in the Andyke. It is likely that in such a view the application proposal would be visible as a backdrop to the monument. A photomontage or wireframe view from an appropriate position along the footpath would help to determine the likely impact that the proposed development would have on the setting of the Andyke.



Plate 4: View available within the centre of Bransbury, looking east-northeast in the direction of the application site, taking in the grade II listed building ‘The Barracks’



Plate 5: View looking east-northeast in the direction of the application site, taking in the Andyke

- 5.19 A further potential concern with regard to the Andyke is that the section of the Scheduled Monument that lies to the north of the A303, and is likely to survive in the form of buried archaeological remains, could be damaged in the event of the electricity connection to the proposed waste to energy facility being made in close proximity to the A303. Should this not be the case, and an electricity connection is formed further to the north, harm could otherwise be caused to the well-preserved 'herringbone' pattern of medieval water management.
- 5.20 There are no adequate photographs embracing views of the landscape setting of Tidbury Ring Scheduled Monument, looking westwards towards the application site. Although this monument is not traversed by public rights of way, and therefore not publicly accessible, it is nevertheless likely that, from its elevated position, the proposed waste to energy facility would have a marked impact on its setting. In this context it should be noted that Central Government advice, set out in the Planning Practice Guidance (PPG), and Historic England's advice in GPA3, points out that the contribution that setting makes to the significance of a heritage assets does not depend on there being public rights or an ability to otherwise access or experience that setting.
- 5.21 A photograph from a viewpoint on a public footpath to the west of the Tidbury Ring (RV27) is provided in Chapter 14 of the PEIR. Whilst this taken at lower elevation than that of the monument, it does give some indication of the high degree of visibility of the application site that there would be from the monument. The site is likely to be far more prominent from the elevated position of the monument itself. A photomontage or wireframe view from such a position would help to determine the likely impact that the proposed development would have on the setting of Tidbury Ring.
- 5.22 The very limited range of photographic viewpoints selected within the PEIR that are specifically related to the settings of heritage assets, means that there is an inadequate basis for photomontages and wireframes that would enable a proper assessment of likely heritage impacts arising from the development.
- 5.23 Bearing the above factors in mind, a further set of photographs, specifically geared towards heritage impacts, will be needed in respect of a targeted range of heritage assets. This includes listed buildings, scheduled monuments and conservation areas that can be identified as likely to be visually impacted upon by the proposed development. The creation of appropriate wireframes and photomontages based on photographs, specifically related to the settings of heritage assets, will help to ensure that an informed assessment can be made in respect of impact on these assets.

Assessment of heritage impacts in the PEIR

- 5.24 In the absence of the sufficiently robust definitions of the settings of heritage assets likely to be affected, and without photomontages and wireframes, it is simply not possible to arrive at informed conclusions in respect of heritage impact. Nevertheless, this is precisely what Chapter 13 attempts to do.
- 5.25 It is notable that all of the predicted impacts on the settings of identified built heritage assets are considered to be 'low' or 'very low'. For example, the impact on the Longparish Conservation Area is considered to be 'very low', leading to a 'minor adverse' significance of effect. This is based on the assertion that only *'glimpsed views of the proposed development's chimney stacks from within the conservation area'*. The narrative in this instance cites the presence of screening from deciduous trees along the river and elsewhere in the conservation area.
- 5.26 It is not clear from the information provided, and the limited range of viewpoints selected for visualisation, how the conclusions have been reached. For example, in the case of the Longparish Conservation Area, given its extensive, linear nature, with varying visibility towards the application site, it seems unlikely that all the impacts will be equally low. It does, however, appear, at this stage, that little significance is accorded to the landscape setting of the Longparish Conservation Area. This also appears to be the case with other heritage assets.
- 5.27 As another example, an assessment of the likely impact of the proposed development on the setting of Tidbury Ring is provided in Chapter 13 of the PEIR (paragraph 13.121). It acknowledges that the application site is clearly intervisible with the monument due to the hill fort's prominent location and lack of dense intervening vegetation. The PEIR nevertheless argues that because the setting of the monument has already been degraded by the presence of a recycling facility immediately to the east of the site and a solar farm to the north, the additional effects on the asset's setting would be 'very low' and not result in additional degradation of its setting, or an ability to appreciate the asset. The PEIR therefore concludes that the effect would not be significant. Given the very large scale of the proposed development this assertion is questionable. A more informed analysis of setting, supported by photomontage, looking west from the monument in the direction of the proposed waste to energy facility is needed to enable this assertion to be properly tested.

Mitigation measures

- 5.28 With regard to mitigation, it is noted that the Chapter 13 of the PEIR entirely focusses on buried archaeological issues. No specific mitigation measures are proposed in respect of built heritage assets, e.g. off-site planting or screening. This is presumably on the basis that no significant adverse effects are identified except in two cases. It is however, noted that in respect to landscape matters muted colours are proposed for the proposed development.
- 5.29 More consideration needs to be given as to the need for mitigation measures to preserve and enhance the settings of heritage assets affected by the development proposals. If no measures are proposed, adequate justification needs to be provided as to why none are needed.

6.0 Conclusions

- 6.1 The proposed Wheelabrator Harewood Waste to Energy Facility is likely to have an impact on a range of designated and undesignated heritage assets in the Test Valley. The greatest impacts are likely to be on assets in the villages of Longparish and Barton Stacey.
- 6.2 The baseline information contained in the Preliminary Environmental Information Report (PEIR) submitted as part of the Stage 2 consultation process has been found to be lacking in sufficient detail to enable a full assessment of heritage impact, and will require augmentation. Specifically, it is considered that the assessment of the settings of a number of key heritage assets is insufficiently robust. This includes, in particular, the conservation areas of Longparish and Barton Stacey, listed buildings within them, but also applies to other designated heritage assets likely to be affected in close proximity to the proposed Waste to Energy Facility.
- 6.3 The PEIR is not accompanied by photomontage and wireframe images that would enable a more informed assessment of impacts by consultees. Additionally, there is limited photography specifically geared to the settings of heritage assets that would, in turn, provide a basis for the production of appropriate photomontages/wireframes of heritage impacts.
- 6.4 On the basis of the above concerns it is not considered that the information contained in Chapter 13 of the PEIR and its appendix is sufficient to meet the requirements of Regulation 14(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, namely to enable consultees to develop an informed view of the likely significant effects of the proposed development.
- 6.5 In order for consultees, including KTVB, to make informed and meaningful responses in respect of the proposals for the Wheelabrator Harewood Waste to Energy Facility, it will be necessary for the developers and their agents to provide comprehensive and accurate information that would form the basis for a robust environmental statement. Before informed decisions can be made in respect of heritage impact, more robust baseline analysis of the settings of the heritage assets that are likely to be affected by the proposal will be required. Additionally, further information in the form of appropriate photography accurate wireframes and photomontages, showing views of the proposed waste to energy facility in relation to a carefully targeted list of heritage assets, will be required.