

- 3.71 Not only is the grid connection not mentioned in the section on cumulative impacts, despite the Scoping Opinion requiring consideration of the potential options for connection, the discussion of cumulative impacts at paragraph 13.177 shows a lack of understanding of what a cumulative impact is.
- 3.72 In summary, the baseline information contained in the Preliminary Environmental Information Report (PEIR) submitted as part of the Stage 2 consultation process is 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 facility.
- 3.73 Further technical comment on the archaeology and heritage assessment is included as an appendix to this report.

### **Landscape and Visual Impact Assessment**

- 3.74 With the exception of a single 'indicative image' from the south in the Consultation Leaflet (which has been generated from Google Streetview rather than using Viewpoint 4 from the LVIA and therefore the accuracy of the image is questioned) there are no other visually verified montages or statements on mitigation measures in the PEIR chapters or Non-Technical Summary (NTS) to assist the reader to understand what the proposed development would look like from the north, east and west. With regard to this single indicative image, no information is provided to inform the indicative image on the leaflet. Indeed, there are a number of discrepancies in the information provided. It is therefore misleading to show the illustrative scheme over that for which consent is sought.
- 3.75 Para 14.56 of the PEIR states that: "*Photomontages and wirelines (visualisations) of the Proposed Development have not been undertaken for the PEIR but will be undertaken for the ES.*" The process of assessing visual effects is therefore unreliable. There is no explanation as to how the assessor has determined whether the proposed development (and if so how much of it) will be visible from each receptor. Consultees cannot, therefore, rely on the assessment of effects in this chapter of the PEIR.
- 3.76 The inadequacies of this chapter are another significant example of the inadequacies of the consultation.
- 3.77 There has been absolutely no regard to the characteristics, guidelines and strategies set out in the tiers of landscape character assessments. Therefore, not surprisingly, due to the combination of site location, shape and surrounding landscape characteristics, moderate and major adverse landscape and visual effects remain. No beneficial landscape and visual effects have been identified.
- 3.78 Given that, to provide flexibility over the final design, the DCO will be based on parameters, it is unclear why the consultation was based on a specific illustrative design. Either the proposals need to be refined to fix the design to show a curved roof, or the images that are produced need to show the maximum extents of the proposed buildings (i.e. a building without a curved roof). What has been produced for the consultation is

- 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 50,000m<sup>3</sup> 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