



Wheelabrator Harewood Waste to Energy

Summary Representations on behalf of Keep Test Valley Beautiful

Adams Hendry Consulting Ltd.

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Summary representations on Wheelabrator Harewood Waste to Energy Facility

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The consultation process

1. The consultation has not been carried out in accordance with the Statement of Community Consultation (SOCC) in that it does not meet the stated objective of providing '*clear and concise information during consultation*'. The material published to date is far from clear and concise, rather it fails to include information on key parts of the proposal, is internally inconsistent and misleading in that it attempts to draw conclusions on the likely environmental effects of the proposal when the evidence to support those conclusions is absent.
2. The SOCC makes it clear that a Preliminary Environmental Information Report (PEIR) and Non-Technical Summary will be made available as part of the consultation. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 defines PEI as that which is '*reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)*'.
3. KTVB consider that the PEIR is inadequate in that it does not provide sufficient information to enable consultees to understand the likely environmental effects of the proposed development to inform their consultation response during the pre-application state. The consultation is therefore contrary to the provisions of section 47(7) of the Planning Act 2008.
4. Section 50(3) of the Planning Act 2008 makes it clear that the applicant must have regard to guidance about the pre-application procedure. The latest guidance from DCLG (March 2015) requires consultation to be based on accurate information, be sufficiently developed to provide some detail on what is being proposed and be engaging or accessible in style. The information from Wheelabrator does not accord with this guidance and therefore the consultation is contrary to section 50(3) of the Planning Act 2008.

The proposed development

5. The National Policy Statement (NPS) for Energy (EN-1) makes it clear that the connection of a proposed electricity generating plant to the electricity network is an important consideration and that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application or in separate applications submitted in tandem which have been prepared in an integrated way.
6. The NPS for Renewable Energy Infrastructure (EN-3) similarly makes it clear that any application must include information on how the generating station is to be connected and whether there are any particular environmental issues likely to arise from that connection.
7. The only information provided by the applicant on this issue is that the incinerator will be connected to a substation in Andover on a route that is between 7km and 10km from the site. No information is provided on the likely route or how the rights to install an electric line and any related equipment will be acquired given that the grid connection does not form part of the proposal for which a DCO is sought.
8. Without a connection to the grid the proposal is simply for an incinerator. Section 15(2)(c) of the

Planning Act 2008 requires a generating station to have a capacity of more than 50 megawatts to be considered a Nationally Significant Infrastructure Project. Further explanation is required as to how the capacity of the facility is measured without a connection to the grid or any battery storage on site.

9. It is unclear precisely what has been assessed in the PEIR as information on the proposal is spread across a number of the assessment chapters rather than included in full in Chapter 4. By way of example, it is not until Chapter 12 that reference is made to the excavation of 50,000m³ of material to accommodate the bunker. There is no mention of this in the landscape chapter which is a major omission. Further information is required on likely future levels and use of the laydown area.
10. It is noted that the height of the building above ground has been reduced by 9m. It is not clear whether this measurement is from the top of the slab or whether it includes sufficient depth to allow for appropriate foundations. This is an important issue bearing in mind that groundwater has been found at 6.3m bgl.
11. Given that the DCO will be based on parameters to provide flexibility over the final design, it is unclear why the images produced for the consultation are based on a specific design and certainly do not represent the worst-case scenario. 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.

Scoping Opinion – consideration of alternatives

12. No information is provided on alternative sites, rather the PEIR refers to a high-level search exercise being undertaken within Hampshire and the wider area for potentially suitable sites. This is contrary to the Scoping Opinion and the EIA Regulations.
13. The reasons given in the PEIR for the selection of the site do not include environmental considerations and are largely unsubstantiated. The location of the site relative to available waste/fuel supply within Hampshire and the region is given as a key reason for the choice of the site, yet no information is provided on the source or amount of any residual waste/fuel.
14. No information is provided on the scale of operational, environmental and transportation benefits of co-locating the facility with the existing Raymond Brown MRF and IBA operations in the context of those associated with the proposed incinerator.
15. The potential for CHP is identified as a key locational factor in NPS EN-1, yet this has not been taken into account in the reasons for site selection set out in paragraph 5.2.1 of the PEIR.
16. It is unclear why the availability of the land and the ability to agree commercial terms is identified as a reason for site selection given that compulsory purchase powers may be sought as part of an application for a Development Consent Order. It would appear that this has been the driving factor for site selection rather than any consideration of likely environmental effects.
17. No information is provided on the scale of operational, environmental or transportation benefits of

co-locating the facility with the existing Raymond Brown MRF and IBA operations in the context of those associated with the proposed incinerator.

18. No evidence is provided to demonstrate that visual impact has been minimised through the consideration of best available technology.

The need for the proposed development

19. NPS EN-3 makes it clear that the Secretary of State must be satisfied, with reference to the relevant waste strategies and plans, that the proposed waste combustion generating station is in accordance with the waste hierarchy and of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets.
20. The information in the PEIR relates solely to the need for energy and does not include sufficient information on the extent to which the generating station and capacity proposed contributes to the recovery targets set out in the relevant strategies and plans, taking into account existing capacity.
21. Further information is required on the waste catchment as well as the existing and future capacity (i.e. through consented but not yet implemented schemes) in that catchment and a detailed explanation is required as to how the quantum of residual waste has been calculated broken down on a county basis.
22. Clarification is required on what proportion of the residual 900,000 tonnes is assumed to be municipal solid waste (MSW) and what proportion is commercial and industrial (C&I).
23. Much is made of the need for energy as set out in the NPS, yet the proposal as it stands will not make any contribution towards meeting energy needs without a connection to the grid.

Traffic and transport

24. The lack of a transport assessment makes it very difficult to properly consider the proposals. As the traffic surveys to inform the assessment have yet to be completed, it is unclear on what basis the conclusions on likely impact have been reached.
25. A detailed breakdown of vehicle movements is required as well as information on the origin and destination of these vehicle movements.
26. It is unclear how much material will be brought to the site that cannot be processed. This needs to be clarified and assessed.
27. 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.

Air quality

28. No information is available on the impacts of atmospheric emissions from road traffic. This is a

significant omission which brings into question the validity of any assessment outcomes.

29. The information required to complete the assessments based on the design as it currently stands is incomplete. It is questionable therefore as to what reliance can be placed upon it.
30. It is not clear whether back-up generators will be used to avoid major accidents during emergency shut-down and testing. If such generators will be routinely used, then this represents a major omission from the PEIR since the air quality impacts will have been misrepresented.
31. The PEIR predicts that the scheme will cause exceedances of its adopted screening criteria at all of the ecological sites considered and at the priority habitats and states that the implications will be considered in the ES. It is concluded that this is not significant in the absence of any assessment which is clearly scientifically troubling.
32. It is clear that the air quality sections of the PEIR are incomplete and thus not sufficient to understand or adequately assess the air quality effects of the Scheme. It is highly concerning that conclusions have been reached and reported prior to the required assessment being carried out. It is recommended that the reported conclusions be disregarded until such time as they can be supported by a robust air quality assessment.

Health

33. It is not clear how the conclusions on health impacts have been reached when the Human Health Risk Assessment is still to be produced.
34. 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. As most of these assessments are incomplete, the conclusions drawn in the health assessment cannot be relied upon.

Noise and vibration

35. 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.
36. Neither baseline noise survey nor baseline traffic flows were completed to inform the PEIR. Furthermore, no information was available 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.
37. 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.

Biodiversity

38. A number of important areas of survey have not been completed including analysis of bat activity survey data and the dormouse survey, the results of which are incomplete. Another major omission is an assessment of the value of the site for wintering birds.
39. There is no assessment of air quality impacts on protected habitats and sites, which is a very significant omission.
40. 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.
41. There is 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.
42. The application site boundary is inconsistent in the report (shown with and without the laydown area in the north). This has implications in the 'search radius' applied in the assessments and the exclusion of features that are just outside the arbitrary 1km search radius.

Water resources and flood risk

43. The application site boundary is inconsistent in the report which has implications for the 'search radius' applied in the assessments and the exclusion of features that are just outside the arbitrary 1km search radius.
44. There are conflicting statements within the report as to the level of risk to the site from groundwater flooding. PIER 2 Chapter 11-2 states that the site is not seen to be susceptible to groundwater flooding while PIER 1 Chapter 11 states that the nature of the geology, relatively high groundwater and reported floods in the wider catchment indicate that groundwater flood risk is considered to be high.
45. An increase in water demand in an already vulnerable region may affect the regional groundwater resources and dependent water features. Considering that the area's rivers are almost entirely groundwater fed, this is of critical importance.
46. No evidence is provided to justify the water requirement of 135,000m³ a year, nor is there any evidence to demonstrate that the level of water required to supply the development is available and that it has been taken into consideration in Southern Water's Water Resources Management Plan which forecasts significant water supply deficits within Hampshire. Further information is required on these points.

Ground conditions

47. The PEIR notes that the application does not seek a maximum depth. Given the potential for

harm to groundwater resources, a maximum depth must be specified in the application and the impacts of that level of excavation properly assessed.

48. The PEIR notes that a cut and fill balance will be sought to minimise the requirement for import or export of materials and associated traffic and environmental effects. Further explanation is required on the assumptions relied upon for import and export of materials. As currently drafted, it is not clear what has been taken into account in the assessment.
49. It is assumed that the grid connection will be underground and therefore there is potential for ground conditions to be affected. The fact that no information on this issue has been provided is a serious omission.

Archaeology and heritage

50. The PIER notes that ground levelling activities are planned to result in a change to ground elevations of up to 7m. This has the potential for significant effects which need to be properly assessed.
51. Reference is made to embedded mitigation that has been taken into account in the assessment. Further information is required on precisely what this consists of and how it is to be secured in the DCO given that the design is not likely to be fixed.
52. More refined assessment is needed in relation to the settings of heritage assets, and in particular the contribution made by setting to the significance, particularly in relation to Conservation Areas.
53. It is noted that the assessment of the effect on the Andyke will be limited as the facility will be largely screened by vegetation. Confirmation is required as to whether this conclusion still stands in winter views.
54. No wireframes or photomontages have been prepared at this stage. Without these, it is difficult to understand how any meaningful conclusions can be reached on heritage impacts.
55. No assessment has been undertaken of the grid connection. Bearing in mind that it will likely necessitate a trench of between 7-10km, this is a serious omission.

Landscape and visual impact

56. With the exception of a single 'indicative image' from the south in the Consultation Leaflet (the accuracy of which 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
57. The assessment in the PEIR does not include information on lighting and it not clear what assumption has been made regarding the use of solar panels as they are not shown on any of the plans.
58. It is not clear why the operation at year 15 during summer when the plume is not visible represents the worst case. Clearly, this is the best case. The worst case for future operation

would be at year 15 during the winter with the plume visible.

Climate change

59. Hampshire County Council and Test Valley Borough Council have both declared a climate emergency and are proposing measures to eliminate their carbon footprint. This should be acknowledged and addressed in the submitted application.
60. 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 on Green House Gas (GHG) are sufficiently robust.
61. 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.
62. Further justification is required to support the assumption that 500,000 tonnes of residual waste would otherwise be landfilled, particularly that which is currently exported overseas.

Socio-economic

63. Public rights of way should be included as a recreation/tourism receptor. The 2km study area is inadequate given the proposed incinerator will be visible from public rights of way at greater distances.
64. 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.
65. The River Test is world famous for trout fishing. 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.

Other issues

66. 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.
67. 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.

Conclusion

68. A clear and comprehensive description of the proposals is missing from the PEIR, the consequences of which are that it is not clear precisely what has been assessed and this seems to differ from chapter to chapter.

69. The connection to the grid is an essential part of the project. Without that connection or any other way to store the electricity generated, the proposal is not a Nationally Significant Infrastructure Project (NSIP) but an incinerator.
70. The lack of any detail on the grid connection is a major omission as this on its own may give rise to significant environmental effects. It is unclear how the applicant will acquire the rights to lay an electricity connection given that it does not have control of the land.
71. The information provided on alternatives is woefully inadequate and limited to design although importantly consideration of best available technology to minimise visual impact is missing. No information is provided on alternative sites contrary to both the Scoping Opinion and the EIA Regulations. The reasons given in the PEIR for the selection of the site do not include environmental considerations, are largely unsubstantiated and seem to be heavily influenced by the availability of land and the ability to reach commercial terms.
72. The conclusions in the PEIR are largely unsubstantiated due to the fact that a significant amount of evidence is still outstanding. In light of this, it is questioned whether consultation bodies can understand the likely environmental effects and make an informed comment at this stage.
73. The inaccuracy and inadequacy of the material means that there are numerous aspects of the proposal and its effects which have not been addressed either at all or sufficiently.
74. The consultation is therefore contrary to the provisions of sections 47(7) and 50(3) of the Planning Act 2008.