



**Winchester**  
City Council

**Development  
Management**

City Offices  
Colebrook Street  
Winchester  
Hampshire  
SO23 9LJ

**tel** 01962 840 222

**fax** 01962 841 365

telephone calls may be recorded

**website** [www.winchester.gov.uk](http://www.winchester.gov.uk)

To DWD  
Acting for  
WTI/EfW Holdings Limited

Case No:  
Your Ref:  
Enq to: Mr Stephen Cornwell  
Direct Dial: 01962 848 485

Please quote on all correspondence

12 December 2019

Dear Sir

**Subject: National Strategic Infrastructure Project to be considered under Planning Act 2008 (as amended) Wheelabrator Harewood: Proposed Application for a New Waste to Energy Facility and Associated Development on land to the West of Raymond Brown Waste Solutions, A303 Enviropark, Drayton Road, Barton Stacey, Andover, Hampshire. SO21 3QS**

I refer to the above mentioned project which is currently in the pre-application stage for consideration as a National Strategic Infrastructure Project. This letter contains the formal response of Winchester City Council (WCC) to the Preliminary Environmental Impact Report (PEIR) and the Consultation Document which has been put out as part of a consultation exercise running from Wednesday 31 October 2019 to 1700 hours on Thursday 12 December 2019.

## **Introduction**

The proposed location of the incinerator lies within the Test Valley Borough Council area. For the purposes of the 2008 Planning Act, Winchester City Council (WCC) is a neighbouring authority with regard to this proposal. Accordingly, the following comments will focus on this perspective but touch on other matters where the Council considered that they have a bearing on its function as a local planning authority (LPA).

The local planning authority notes the status of the proposal and the following comments have been framed to reflect the current stage in the pre application process. In that context, the majority of the comments below are encouraging the applicant to present greater clarity on specific issues and undertake further engagement with the interested local planning authorities and the wider community. As part of that process, WCC remains committed to working with Wheelabrator.



INVESTOR IN PEOPLE

**Simon Finch** BSc (Hons) Lond, DipTP, MSc, MRTPI **Head of Planning Management**



printed on recycled paper

The comments below relate to the PEIR and are structured under the relevant chapter headings. The comments have drawn on views from other colleagues within the authority. This response has also been discussed with the Portfolio Holder for the Built Environment and Wellbeing.

## **Background**

The proposal would see the construction of a waste to energy facility taking in up to 500,000 tonnes of municipal solid waste, commercial and industrial waste. It could generate up to 65MW gross electrical output. There would be 2 combustion lines, allowing for operations to be ongoing whilst one line is undergoing repair or maintenance. A 24hr 7 days a week operational programme is envisaged over 285 days per year, with the remaining down time used for maintenance. The facility would have a design life of 50 years. Access to the site is off the A303. The feedstock is envisaged coming from a broad area including Hampshire, Dorset and Wiltshire. The complex of elements would be designed to nestle around the tallest building which would be the boiler house. Two chimneys are also proposed. The combustion process would be undertaken using an inclined reciprocating grate technology enabling a burn of at least 2 seconds at a temperature exceeding 850C. The flue gas treatment system will be designed to achieve emissions within the limits as specified in the Industrial Emissions Directive and in the Best Available Technology reference document for Incineration. These would be enforced through the Environmental Permit that the plant will be required to hold. Sections of solar panels would be attached to the roof and walls of the building generating 2MW of electricity. The electricity connection to the grid is not put forward as part of the proposed DCO proposal.

## **Chapter 5 Alternatives**

It is considered that the section on how this site was chosen needs further information. The reference in the document to the facility being CHP ready for when the heat demand arises is considered a highly optimistic statement when the potential for development within the surrounding area is considered. Without an identified outlet for the waste heat, the efficiency of the facility is considered to be severely compromised. The view of WCC is that this factor should have featured as one of the principle considerations in the site selection process.

Within an environmental statement the applicant is obliged to include information on the main alternatives they have studied and the reasons for their choice. The reasons this site was chosen are listed in the documents as the following:

- Location to Hampshire and region
- Proximity to Enviopark next door
- Proximity to strategic road network
- Low environmental sensitivity of site
- Availability of land

None of the above are viewed as critical in the selection process and it is considered that they are as likely to apply to a number of other sites. A far more rigorous

explanation and justification of why this site was chosen is required. It is noted that the proximity to an electricity connection point on the grid is not identified as one of the considerations.

The grid connection should form part of the submission as an essential component of the overall project.

The potential for this type of facility to be located at a former energy generating site such as Didcot should have been considered particularly given that locations additional access to the rail network.

One of the alternatives is the do nothing scenario. This appears to have been discounted without any clear assessment of the future direction of recycling generally. The projected 50 year design life of the facility is noted. In view of the dynamic nature of the recycling industry some recognition of the potential availability of feedstocks throughout this period should be considered including the future trends in waste management. Indicators suggest less waste being generated in the future or with better options for reuse or recycling and it would be perverse if feedstock was being trucked over long distances to supply the facility. This would defeat the principle of reducing emissions. The presence of other energy from waste incinerators is noted and so the concept of completion for waste is a realistic possibility which could result in premature redundancy of the plant. Whilst paragraph 4.89 says it is unrealistic and potentially misleading to attempt at this stage to provide information on the origin of the fuel this is not accepted.

The applicant states that the proposal would generate employment opportunities in the local area. Whilst focusing on the Andover Travel To Work Area, this benefit could presumably apply to parts of the Winchester area. Conversely, the proximity of the site to the strategic road network is considered to give people the ability of travelling to the site from a wider area which may dilute any more localised benefits.

## **Chapter 6 Traffic**

The lack of any links to public transport opportunities means that all employees will drive to the site by car. A strategy to reduce individual car use and to prevent both construction traffic and employee traffic from using the A272/A30 and local road network should be put forward.

The inadequate standard of the east and west bound de-acceleration and acceleration lanes at the junction of the A303 and Drayton Road, are noted. This situation is considered to be an incentive for people to avoid using the A303 and seek instead to find an alternative route to and from the site which would involve the use of the rural road network referred to above. For traffic approaching from the south this means using local roads that pass through the WCC area. This concern needs to be recognised, assessed and appropriate mitigation measures put forward.

At the operational stage a similar set of measures should be adopted.

It is projected that 40% of the traffic delivering feedstock to the site will come up the A34. The PEIR at paragraph 6.165 acknowledges the Junction 9 M3 road improvement, but simply says this has to be factored in. A more detailed and thoughtful analysis of this is required. If the junction improvements do take place they may result in

traffic delays which can lead to traffic seeking to bypass the road works by using the roads through Winchester itself. The City has poor air quality which any additional HGV traffic will not improve. More than that, if HGVs do pass through the city, they are less likely to re-join the A34 but continue up the A272 seeking a rural route to the site.

## **Chapter 7 Air Quality**

The WCC Chartered Environmental Health Practitioner has commented on the proposal. His comments are included in the response below but the full version is attached at the back of this letter.

In general terms of noise and air quality, the proposed modelled receptors are acceptable. The approaches to the analysis of the impact from emissions on human health are noted.

It is considered that the scientific implications to health relative to the size of particulates is becoming an ever more apparent and important factor. The ability to meet standards will be influenced by the nature and degree of waste in the burn. It should be clarified what risk may result if one particular type of waste is burnt (for example plastic) and whether that burn could overwhelm the emissions treatment system resulting in an escape of an over concentration of particulate matter or other elements in the flue gases. A more detailed outline of the handling and any pre treatment/processing of the waste stream before it enters the incinerator is required.

The nature and extent of the proposed waste feedstock needs qualifying in greater detail.

A critical factor is considered to be the ability of the facility to adapt to future tightening of requirements to reduce emission levels. It needs to be clarified if the facility has a sufficient level of inbuilt resilience to allow for improvements in the future. For example, if the particulate level is reduced to include the capture of smaller PM2.5 particulate matter.

The details contain a reference to the presence of an ongoing monitoring system of the emissions. However, it is not clear what procedure would be followed if this system identified a concern with the emission levels. This needs clarifying and setting out using a number of scenarios if this assists in the clarification.

## **Chapter 13 Archaeology and Heritage**

The comments of the Historic Environment Team Leader are included below. There is no objections to the methodology used to assess the impact on the built heritage. There are however some queries in relation to the assessment in terms of conservation areas which it is considered require clarification. The table on page 10 of Chapter 13 (Archaeology and Heritage) states that conservation areas have a medium heritage value but that conservation areas of a demonstrable high value would have a high heritage value. I have not been able to find a definition of what constitutes 'demonstrable high value' or a methodology for how this would be assessed in the submitted documentation. However it is noted that Barton Stacey, Longparish and Hurstbourne Priors Conservation areas are considered to have high value (p. 17). The study appears to omit an assessment of the impact on the Sutton Scotney conservation area, Tufton Conservation area in Basingstoke and Deane, and Wherwell Conservation

Area in Test Valley, all of which fall within the 5km distance band and should be considered.

It is considered that an additional view from the elevated site at Norbury ring is required.

No panoramic views or wire frames showing the potential impact of development appear to have been submitted and this is a significant omission which should be rectified.

## **Chapter 14 Landscape & Visual Impact**

The views of the Landscape Officer have been sought and their conclusions are contained in the comments below. A full copy of their response is set out at the back of this letter.

Landscape and visual impact is a direct product of the size and scale of the proposed facility. The details refer to a reduction in the height of the main buildings and chimneys following closer analysis. However, the PEIR does reference to different heights and this needs to be edited out to one consistent set of figures. In paragraph 2.2.2 reference is made to the boiler house of up to 55m and chimneys 90-100m in height. Paragraph 2.3.4 again makes reference to the 90-100m chimney heights. Table 4.2 then refers to a main facility with a maximum height of 46m and the chimneys having a maximum height of 80m.

The size of the building is directly related to the space needed to accommodate the equipment. The choice of the inclined reciprocating grate technology chosen for the combustion process needs to be justified in the context that another technology might result in a development that has a lower height for the buildings and consequential a reduced visual impact.

Paragraph 14.40 sets out that the plume is not considered in the impact assessments as it is 'only expected to be visible intermittently'. The affects of the plume should be considered as a worst case scenario.

The impacts of night time lighting should be included within any assessment but both the construction and operational phases of the development. The assessment should address impacts to aviation receptors and should also address impacts from the potential illumination of the plumes during night-time. The assessment should cross-refer to other relevant aspect assessments (such as ecology and cultural heritage). Due to the height of the chimney stacks, aviation lighting will no doubt be required. The LVIA should assess the additional night time impact this lighting would have. Also whilst the impacts of the plumes cannot be quantified, this impact should not be ignored and discounted from the assessment altogether.

The potential glinting affect at a distance of the proposed solar panels on the roof and/or sides does not appear to have been sufficiently assessed or mitigated at this stage.

The dramatic cut off applied to the 5km distance is considered to be too abrupt to separate the wider visible area from the variable visible area. (para 14.64)

Sutton Scotney which does lie within the 5km zone is not recognised as such in the assessment.

An additional viewpoint is required in the area of Sutton Scotney or a clear and convincing reason why no such viewpoint is proposed. The 5km cut off excludes Norsebury Ring at 100m AOD which lies east of Sutton Scotney and Worston.

The visualisations only show the existing landscape. No attempt has been made to show what the project would look like other than a general reference to a section of the building and chimneys being in view.

It is considered that nothing can be done to reduce the impact within the WCC area of the presence of the building. However the applicant offers no mitigation of any kind in recognition of that situation. This needs to be considered with appropriate mitigation put forward.

## **Conclusion**

Winchester City Council has sought to restrict its comments to those aspects relevant to its standing as a neighbouring authority. The applicant is requested to provide further explanation on a range of issues. A proposal of this nature which involves emission discharges into the atmosphere will inevitably raise concerns in the local community relating to air quality. At the present time the level of detail is considered to have a number of omissions. Whilst recognising that the applicant goes into the PEIR consultation with a scheme still in its formative stage, it should also be recognised that the applicant must put out into the public domain a sufficient degree of information on which the public can make reasonable and rational comments. The DCLG publication Planning Act 2008: Guidance on the pre application process (March 2015) acknowledges that a consultation can take place in phases as detail becomes available. The benefit of this approach is obvious as it allows the progressive development of a scheme and does not hold back detail until the formal submission stage when the consultation exercise is more limited in its nature and extent. The publication and consultation of more detail as a second stage consultation exercise is something the applicant is encouraged to adopt in this instance.

If you have any queries or require further information, please do not hesitate to contact the Case Officer, Mr Stephen Cornwell on 01962 848 485.

Yours faithfully

Julie Pinnock BA (Hons) MTP MRTPI  
Head of Development Management

Full comments attached below from:  
Landscape Officer  
Chartered Environmental Health Practitioner  
Historic Environment Team Leader

## **Landscape Officers Comment in Full**

Thank you for the opportunity to comment. We have concerns relating to how the proposal would affect the the landscape within the WCC boundary.

### **Landscape Policy**

- **NPPF**

With regards to the National Planning Policy Framework, the following paragraphs should be considered in relation to landscape proposals.

*127. Planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area*

*170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

- **WCC Local Plan**

Policy CP13 – High Quality Design

Policy CP20 – Heritage and Landscape Character

Policy DM23 – Rural Character

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

The Landscape and Visual Impact Assessment Chapter 14 of the PIERS admits that the proposed development would result in moderate to major adverse effects; the development would provide no beneficial landscape or visual effects to the immediate or wider landscape. Therefore it is considered that the proposals do not meet the requirements of Paragraphs 127, 130 and 170 of the NPPF and Policies CP13, CP20 and DM23 of WCC's Local Plan.

Winchester City Council boundary is within the 5km zone of theoretical visibility. This brings Sutton Scotney and Egypt within the assessed zone. Higher ground outside of the 5km radius would also be affected visually by the proposed building mass.

### **Assessment Methodology**

*14.39 - The landscape and visual baseline assessments have been based on desk study and field work. Field work has been stated as being undertaken between June 2018 and June 2019 and has included both summer and winter inspections to take account of the changing seasons and the differences between vegetation being in leaf or not.*

The 2019 winter photography has yet to be carried out although there is a statement of the changes that occur in the winter.

*14.40 – this paragraph sets out that the plume is not considered in the impact assessments as it is 'only expected to be visible intermittently'.*

This affects of the plume should be considered as a worst case scenario

### **Inspectors Comments**

*4.9.5 The impact of night time lighting should be assessed for both the construction and operational phases of the Proposed Development. The assessment should address impacts to aviation receptors and should also address impacts from the potential illumination of the plumes during night-time. The*

*assessment should cross-refer to other relevant aspect assessments (such as ecology and cultural heritage).*

*The assessment of impacts to aviation receptors is not a matter for the LVIA, but has been considered in Chapter 17 – Other Issues of this PEIR. The assessment of impacts relating to the potential illumination of the plume at night-time cannot be readily quantified, however the impact of night time lighting will be assessed qualitatively in the LVIA for the ES.*

Due to the height of the chimney stacks, aviation lighting will no doubt be required. The LVIA should assess the additional night time impact this lighting would have. Also whilst the impacts of the plumes cannot be quantified, this impact should not be ignored and discounted from the assessment altogether.

The potential glinting affect at a distance of the proposed solar panels on the roof and/or sides does not appear to have been sufficiently assessed or mitigated at this stage.

## **Conclusion**

Whilst mitigation measures are proposed, these are actually small and cosmetic which would have no benefit to the wider landscape. Due to the combination of site location, shape and surrounding landscape characteristics, moderate and major adverse landscape and visual effects remain with no beneficial landscape and visual effects having been identified. Characteristics, guidelines and strategies set out in the tiers of landscape character assessments have not been taken into consideration.

.....

## **Chartered Environmental Health Practitioner Comment in Full**

On behalf of the David Ingram (Service Lead – Public Protection) I have now reviewed the Preliminary Environmental Impact Report (PEIR). I have restricted my consideration to potential impacts relating to Winchester City Council's District. There is a higher potentiality for more localised impacts but I will be leaving such comments to Test Valley BC in whose area such impacts could occur.

I have therefore reviewed the PEIR with particular reference to the following chapters within the main report and figures (Volume 1):

Chapter 4 – The Proposed Development

Chapter 6 – Traffic & Transport

Chapter 7 – Air Quality (plus Appendix 7.1 of volume 2)

Chapter 8 – Health

Chapter 9 – Noise and Vibration

Chapter 17 – Other Issues (plus Appendix 17.3 Statement of Statutory Nuisance)

There is little consideration of impacts with Winchester City Council's district but this is considered acceptable as the location of the development results in more sensitive/closer receptors being within the Test Valley BC area. I am therefore satisfied that in terms of noise and air quality the proposed modelled receptors are acceptable.

With regards to impacts within Winchester City Council's area, it is likely the main concern to our residents will be potential health impacts from the stack emission discharge. Overall I am satisfied this will be fully assessed by the proposals within this PEIR and in particular note:

1. Although the exact design is not finalised the type of plant and proposed abatement techniques are tried and tested technology.
2. From an ambient air quality perspective the proposed assessment is robust and I welcome the extension of the monitoring exercises to ensure a greater accuracy in the modelling ratification process.



3. The site will also need permitting by the EA that will set wider emission criteria. The proposed assessment will be worst case as it is based on maximum acceptable emission criteria set within the Industrial Emissions Directive (IED).
4. The proposal to include a full Human Health Risk Assessment (HHRA) is welcomed and will need further detailed assessment once complete.

From a wider Climate Change perspective it is worth noting that the plant will not be Combined Heat and Power (CHP) being only “CHP ready”. You may therefore wish to make further comment on seeking more positive steps that could be taken at the planning stage to ensure this functionality is utilised in the future.

.....

### **Historic Environment Team Leader**

I can advise that there are no objections to the methodology used to assess the impact on the built heritage. There are however some queries in relation to the assessment in terms of conservation areas which it is considered require clarification. The table on page 10 of Chapter 13 (Archaeology and Heritage) states that conservation areas have a medium heritage value but that conservation areas of a demonstrable high value would have a high heritage value. I have not been able to find a definition of what constitutes ‘demonstrable high value’ or a methodology for how this would be assessed in the submitted documentation. However it is noted that Barton Stacey, Longparish and Hurstbourne Priors Conservation areas are considered to have high value (p. 17). The study appears to omit an assessment of the impact on the Sutton Scotney conservation area, Tufton Conservation area in Basingstoke and Deane, and Wherwell Conservation Area in Test Valley, all of which fall within the 5km distance band and should be considered.

It is considered that an additional view from the elevated site at Norbury ring is required.

No panoramic views or wire frames showing the potential impact of development appear to have been submitted and this is a significant omission which should be rectified.

.....