

## **Barton Stacey Parish Council's Response to the Statutory Pre-Application Consultation by Wheelbrator Harewood**

### **Introduction:**

Barton Stacey Parish Council (BSPC) has engaged its residents in an exercise to determine their stance on the Waste to Energy plant (Incinerator) which has been proposed at the Raymond Brown Enviropark within the parish boundary.

This involved a leaflet drop essentially posing the question of the parish Are you in favour or not of the proposals?

The result was overwhelmingly opposed to the scheme.

The BSPC response contained in this document will highlight BSPC's position on the proposals for the Incinerator and provide feedback upon the issues that most concern local residents and also upon the consultation exercise conducted to date.

It is felt that nearly every aspect of the proposals has to date been inadequate. Consistently feedback from residents to the council has centred upon the lack of detail and answers to local concerns raised. It is felt that the team presenting the proposals should, at this stage, have considered detailed responses and solutions to this plethora of concerns raised.

Furthermore, a whole raft of early conclusions about the impacts of various elements appear to have been reached and presented to the public at these consultation events. The council's response to the initial scoping document and first consultation highlighted all of these concerns. It is the parish council's view, and that of the residents, that many of these issues remain unsatisfactorily resolved.

For example, at the latest consultation there were continued claims that the road infrastructure could cope with the extra burden it will have to cater for as a result of the proposals. However, BSPC understands that many of the surveys have, as yet, not been completed and that the highways authorities have not been properly engaged.

Fundamentally BSPC feels that the consultation exercise is inadequate and does not adhere to its primary purpose of providing sufficient information to the local population in a format that is readily digestible and accessible for the very people who need it to be so, i.e. local residents. Much of the content is not in the view of the parish council presented in a format that allows a non-expert to fully understand and therefore participate and engage fully in this consultation exercise. In the council's opinion, it is a flawed consultation exercise.

### **The proposed development:**

Overwhelmingly the feeling of the Parish is that the Incinerator is the wrong type of development in the wrong place. This is exacerbated by the fact that there is no user for one of the by-products of the plant, namely the heat, and the electricity will need to be connected to the national grid some 10KM away.

Add to this the absence of the process by which this facility would be connected to the national grid and the local community feel that it will bring nothing at all to the local area other than a fundamental change to its current rural landscape. This issue of connectivity has to be fully discussed and needs to be incorporated into this consultation exercise, which to date it has not.

Essentially, Barton Stacey would become known as the village by the Incinerator. An overwhelming feeling is that this will in planning terms set a precedent for future development within the immediate area changing it from an area known for fly fishing and rural vistas permanently.

A major concern is the effect that this proposal could have on the various local watercourses. A frequent question we have encountered is how deep will the foundations of such a large structure need to be? In the light of groundwater being close to the surface, at circa 6meters below ground level, how can consultees consistently be told that there would be no material impact in this regard?

The proposed structure is huge and will be intrusive within the proposed setting.

### **1: Alternatives and design evolution (PEIR Chapter 05)**

The PEIR states that there is no policy requirement for the Applicant to consider other sites or justify its selection for the site of the proposed development although it is noted that the final ES will provide a full description of the alternatives considered. The EIA Regulations 2017 states that an applicant must include, in the Environmental Statement, a description of the reasonable alternatives and an indication of the main reasons for the option chosen after considering the impact of the development on the environment. Surely this should have been included in the PEIR as part of the consultation process. Without this information it impossible, at this stage, to comment on the comparative merits or demerits of the chosen site.

**Design** - attempts have been made to soften the visual impact of the building by replacing the rectilinear form with curves, adding some cladding and by marginally reducing the height. These changes must be considered in the context of the huge and overbearing nature of the building. A height reduction does nothing to reduce the destructive visual

impact for all local people, the many thousands that pass the site daily and those who will see it from many kilometres away. The building remains a vast monolith which would be completely out of character in the rural setting.

## **2: Traffic and Transport (PEIR Chapter 06)**

BSPC requested that the scoping of traffic must include the A34 as well as A303 and should also be carried out on Fridays and Saturdays during peak holiday times, especially through July and August. Hurstbourne Priors Parish Council (HPC) also requested Bullington Cross Junction of the A303 and A34 to be included. It appears that much of this will not to be carried out which is unacceptable.

BSPC is very concerned that Wheelabrator Harewood has assessed the impact to Traffic and Transport as **Not Significant** in the construction stage, once operational and on decommissioning despite the fact that traffic surveys are ongoing and not yet completed. It is not clear how these conclusions have been reached.

Another example of insufficient information upon which residents are asked to make an informed decision.

The A34 /A303 at Bullington Cross is known locally to be subject to accidents. The extract below was taken from Hansard 26<sup>th</sup> October 2016 volume 616. Kit Malthouse spoke in support of Mr Edward Vaisey who had raised the issue of road safety along the A34 (in particular in his constituency):

### Kit Malthouse (North West Hampshire) (Con)

“I congratulate my right hon. Friend on securing this debate in what seems to be a sauna this morning. Will he acknowledge that while the statistics he outlined are alarming, they are even more alarming if we add in the accidents that take place at intersections with other roads? For instance, I am concerned about the junction of the A303 and the A34 at Bullington Cross, which by about 100 yards is not in my constituency but which is used nevertheless by my constituents. A significant number of accidents there are reported as A303 accidents but relate to the junction between the two roads and could be attributed to either road.”

It should be noted that West Berkshire is one of the catchment areas for waste for this proposed plant. The A34 will be the road used for transporting waste from both north of Hampshire and from coastal areas. There are already a large number of lorries along this road as it is used by traffic to and from Portsmouth and Southampton Docks. It beggars belief that no traffic counts will be carried out on the A34.

Accidents, even minor ones or breakdowns, on the A303 and A34 impact on villages along these networks, major accidents grid lock villages and make local journeys for residents very difficult, these include essential journeys to local schools and doctors surgeries.

A fairly recent breakdown on 1<sup>st</sup> September 2019, a Sunday afternoon, demonstrates the impact on local areas, had this been on the A303 both Longparish and Barton Stacey would have experienced high levels of traffic as drivers seek to find other routes.

*“A vehicle broke down in the northbound lane on the stretch of the A34 between the A272 and the A303. Traffic queued back from just north of Bullington Cross to beyond South Wonston. Delays of up to 45 minutes were reported with average speeds of five miles per hour. The incident also caused congestion on the A303 eastbound, with delays building between Forton and the Bullington Cross junction.”* (Andover Advertiser)

How can any traffic assessment for such a large project reject requests to assess traffic flows on major road networks within 5kms of the proposed site? Additionally, BSPC is very concerned that local knowledge has been disregarded and the study area for appraisal has been agreed with HCC and Highways England.

The 2018 traffic counts were completed during June 2018 which is considered to be a neutral month by the Department of Transport. The PEIR states that this is also one of the busiest months on the A303 but again local knowledge recognises that the end of July and August are the busiest times. Hence requesting traffic counts to be carried out then.

However this knowledge is of very little use in assessing the impact of this Incinerator as little is known about the traffic movements of proposed project; the operational assessment seems to suggest that full production will be achieved in the first year, otherwise why use 2025 to assess the impact of traffic. BSPC would have expected a later year to have been used. BSPC was told at the consultation event that bottom ash would be processed at the Raymond Brown facility so traffic would not be increased by the removal from site of this ash. However, no consideration has been given to the increased production and, therefore, traffic from Raymond Brown. It has been disregarded. Inconsistent information has been provided on where the waste will come from and the type of waste to be burned which will have an impact on traffic flow and size of HGV.

BSPC are also concerned that no impact assessments on traffic and transport have been carried out in the event of an accident or disaster on site, on fire or explosion at the plant given that the PEIR does acknowledge that this is a risk and traffic travelling through villages when major accidents occur on the A303.

Barton Stacey and Longparish were severely affected by the major fire which started in the Ocado warehouse, Andover, in the early hours of 5<sup>th</sup> February 2019. It lasted for 4 days. Traffic was gridlocked around Andover and on the A303. Traffic diverted through villages for many hours. This ultra-modern warehouse was considered not to be at risk from fire or explosion; Wheelabrator Harewood has acknowledged that there is some risk of fire and explosion. Impact assessments are vital for any projected project with even a slight risk fire, release of toxic chemicals and explosion.

Are such assessments planned? BSPC and the residents feel that they should be as a matter of priority.

No conclusions drawn from assessments carried out to date and no future conclusions can possibly be considered to have any value if in-depth, rigorous assessments and traffic appraisals are not carried out in line with those requested in BSPC, LPC and HPC response to the Scoping Document.

### **3: Air Quality (PEIR Chapter 07)**

The PEIR (Non technical) on air quality again admits that tests are ongoing for construction, operation and decommissioning. Six month data will not be completed until well into 2020. Again, assessments have been made and the conclusion reached is that the effect on air quality will not be significant at any stage. BSPC does not believe that it is possible to draw that conclusion given the insufficient amount of work carried out in this area nor will it be sufficient unless all receptors are taken into consideration.

The only receptors identified are in residential properties and ecological sites. Other receptors identified in scoping have been ignored: Barton Stacey School and pre-school, the playing fields next to the school which include a Trim Trail, basketball net and an informal football area, local business including the Barton Stacey Service area, local farmers and farm workers, river keepers and others in jobs related to the Rivers Test and Dever. The MOD land which is used for training is adjacent to this site.

Tests must again be rigorous as it is known that emissions from incinerators can include heavy metals, dioxins and furans, which may be present in the waste gases, water or ash. The combustion of plastics, like polyvinyl chloride (PVC) gives rise to highly toxic pollutants.

Residents have expressed their concerns to Wheelabrator Harewood about emissions from the stack. One expressed his concerns to the air quality expert at the consultation event about the mesh size used to reduce emissions as the one proposed in the specification is larger than those used in crematoria. He did not receive a satisfactory answer.

The PEIR states that the use of a 70 m stack would be capable of mitigating both short-term and long-term impact of all pollutants but elsewhere in the PEIR it states that it is not currently possible to say that there will be no significant effects associated with a 70 m stack. Which statement is correct?

This is another example of unclear presentation within the consultation documentation which has contributed to confusion which makes it difficult for consultees to make an informed decision.

#### **4: Health (PEIR Chapter 08 )**

BSPC is concerned that the PIER documentation states that the “Status of Assessment for Health is largely complete. Additional data unlikely to change final assessment”. This is pre-judging the additional data before it has even been seen. If such an important consideration is not included in material at this statutory consultation stage of the process how can it be said that the public has been consulted?

BSPC is of the opinion that Wheelabrator Harewood has not fully evaluated the health risks from the pollution caused by this plant. The calculations do not even fully include the effect of transport pollution caused by both the construction phase and subsequent 400 vehicle movements each day take no account of when these vehicles are stationary due to the inevitable traffic jams and road closures because the roads into the plant are not designed for such heavy traffic.

Fine particulate matter of <2.5 microns (PM2.5) particularly comes from transport and combustion sources. New evidence has now shown that there is no safe lower limit for exposure to PM2.5 contrary to the previous WHO guideline of 25microgram/metrecubed. PM2.5 has been associated with respiratory and cardiovascular diseases and even ultra-fine particles have been found in the brain and heart (British Medical Journal dated 27th November 2019).

Traces of heavy metals from emissions can be found in humans and animals. This is a risk to humans. A local farmer asked about the risk of heavy metals from the emissions for this plant at the consultation event; unfortunately he did not get a satisfactory answer. If there is any chance of heavy metals falling to the ground the farmer will not be able to sell his lamb to supermarkets because of the detrimental effects to health from heavy metals.

#### **5: Noise and Vibration (PEIR Chapter 09)**

BSPC understands that much of the work required to arrive at a noise assessment has not been started let alone completed. It is therefore difficult for the PC to comment on any specific element of the information presented.

Many parts of Barton Stacey are subjected to noise nuisance on a regular basis when there is an event at the kart track adjacent to the Proposed Development. Residents report significant disturbance from the kart track operations. This already impacts on the quality of life of many residents. More than 120 local residents wrote to Test Valley Borough Council opposing an application to run extra events at the kart track due to concerns about noise nuisance. In certain conditions the kart track can be heard more than 2km away. The traffic on the A303 can be heard in the southern end of the village. This will be amplified by 400

vehicle movements per day, mostly HGVs, braking and moving off from a standing start to exit or enter the A303 or the site.

Chapter 09 does not take into account the inversion effect. When an inversion layer is present, the sound wave is refracted by the temperature gradient (which affects sound speed) and returns towards the ground. The sound, therefore, travels much further than normal.

Many residents particularly those living in Roberts Road and environs and those living at the north end of the Street are concerned that noise levels have not been addressed. HGV reversing alarms typically produce 1000 Hz pure tone beeps at 97-112 decibels. This sound will travel a long distance.

There is potential for noise nuisance from the raised HGV access ramp believed to be up to 6m above ground level.

The placing of noise receptor monitoring equipment appears to be eccentric. There are many houses situated much closer to the Proposed Development and therefore more vulnerable to noise nuisance, in particular towards the northern end of Roberts Road, where noise monitoring equipment has not been employed.

## **6: Biodiversity (PIER Chapter 10)**

BSPC is concerned that a number of important areas of the survey have not been completed including analysis of bat activity survey data and the dormouse survey, the results of which are incomplete.

Bird surveys appear to have been done in spring and summer only. This will clearly fail to identify winter visitors. Further site work should be done.

BSPC can find no assessment of air quality impacts on protected habitats and sites.

The PEIR states; "at the River Test SSSI the scheme will result in a large increase in acid deposition (defined as an increase of more than 10% of the critical load). The implications of this will be discussed in the ES chapter". The potential degradation of some of the world's most famous chalk streams concerns many residents. Leaks, spillages and leaching are a potential threat to water quality in the Test aquifer. There is little evidence of risk mitigation.

BSPC questions the assertion that construction impact will be temporary (5-10 years) and therefore not significant.

It is disappointing that there is not a full Environmental Survey on which to comment. This is a further example of insufficient information upon which residents are being asked to make an informed decision.

### **7: Water Resources, Flood Risk and Ground Conditions. (PEIR Chapters 11 & 12)**

Bearing in mind the scale of the development and proximity to groundwater and surface water courses the current proposals seek to trivialise the potential risks. Farther reaching investigations and study seem appropriate considering the scale of proposals.

The proximity of groundwater to the proposed structure warrants more robust investigation and is not satisfactorily taken into consideration within current proposals. Conducting the bare minimum of investigation appears to be a current theme with the plans as presented.

The extent of water consumption of the site once operational is not adequately considered and the potential for contaminant leakage not covered in presentations.

The potential for surface water run off and leakage of contaminants is also dismissed as unlikely which appears to be an early conclusion not reached in the presentation of investigative studies.

Given all that is outstanding, how has this assessment arrived at conclusions that it is not anticipated will change when further information/data becomes available?

BSPC is very concerned that assumptions made about the amount of water that will be used by the proposed plant are understated and further information about how these figures have been determined should have been supplied in the PEIR. It is also concerned that the construction and operation of this proposed plant will put further strain on water supplies to this area from the Aquifer. The Western Region of Southern Water is already under stress especially in light of proposed changes to abstraction licences.

Any increase in housing will increase domestic demand. Has any modelling been done on increased domestic demand? If so the results should have formed part of the consultation.

Local residents also expressed concerns about the ability of the aquifer to recharge given the size and location of the proposed building. This will be compounded by existing mitigation measures already in place over the aquifer on the Raymond Brown site. This does not appear to have been addressed in the PEIR.

The proposed plant is to be built on chalk and chalk land saturates quickly in periods of heavy rainfall. Many of our residents are concerned about the risk of flooding. Although this area is classified as Zone Flood Risk 1 it is known to have flooded in 1990 and 2014. Contamination of groundwater will pose a severe risk to the region and more investigations

covering a wider area than that proposed in the PEIR should be carried out because of flooding in the wider catchment area.

It is acknowledged in the PEIR that the Winterbourne “is not a recognised permanent water feature, it could be considered that at certain times (potentially years apart) it could constitute a receptor with direct links to the River Dever and the Principal Aquifer. The unnamed Winterbourne is therefore considered to be a receptor of high importance due to its close connectivity with WFD designated waterbodies.” How will this receptor of high importance impact Wheelabrator Harewood proposals?

BSPC is concerned about springs arising in the area providing a pollution route to groundwater/water courses. These appear during periods of prolonged heavy rains and are well known to local residents. PEIR para 11.43.

The above concerns in relation to water and ground water were raised in BSPC Scoping Response but it is felt that they have not been satisfactorily addressed in the PEIR Documents.

## **8 Archaeology and Heritage ( PEIR Chapter 13 )**

The report presents preliminary findings only.

The Andyke, an earthwork referred to as 'Auntediche' in an Anglo-Saxon charter monument, is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. No assessment has been undertaken of the grid connection planned to run along the A303 and bisect the Andyke.

The impact on Barton Stacey Conservation Area is assessed as “Low” while at the same time noting that it will introduce an “incongruous element into the setting of the conservation area which will have an effect on heritage value”. The impact will not be “low” as stated and it is believed the effect will be much more significant than “minor adverse”.

No level of mitigation or attenuation of the proposed development will reduce the impact on cherished heritage assets, not only the overwhelming mass and height of the building and its stacks but also traffic congestion on The Street approaching the site and deterioration of air quality.

## **9: Landscape and Visual Impact Assessment (PEIR Chapter 14)**

Appendix 14.33 states “*The North Wessex Downs AONB Position Statement on Setting (Ref 14-12) provides guidance to local planning authorities regarding development outside but*

*within the setting of the AONB. The setting of the AONB is not a defined area, and “For the purposes of spatial planning, any development or change capable of affecting the significance of the AONB or people’s experience of it can be considered as falling within its setting.”*

There can be little doubt that people’s experience of the AONB will be negatively impacted by the size of the structure, the chimneys and the plume either when driving past the Proposed Development or when walking and cycling. It would be plainly visible from a distance of many kilometres. The area has many designated and named footpaths including the very well-known Test Way which starts in the North Wessex Downs ANOB.

Light pollution is a major issue for many residents who already are subjected to light from the much smaller Raymond Brown site. In many areas of Barton Stacey and Longparish there are no street lights creating areas which are intrinsically dark; so the impact of a brightly lit power plant would be both highly significant and adverse.

(See also light pollution covered under aviation)

The Barton Stacey Village Design statement says: *“The majority of the parish is characterised by open downland with big skies and wide views and a feeling of remoteness and exposure. From the Ordnance Survey trigonometrical point on Newton Hill to the west of the village, there are wide ranging views over the parish and the Hampshire countryside as far as Stockbridge Down. To the east can be seen the rooftops of part of Barton Stacey village amongst the trees. The importance of views and open spaces was a common theme in consultation responses as features that parish residents value most highly.”* The construction of the Proposed Development would destroy what residents treasure.

The absence of photomontages in a winter setting is a major omission.

## **10: Climate Change (PEIR Chapter 15)**

So many studies are still outstanding that it impossible for consultees to make any meaningful comments.

Both Hampshire County Council (17<sup>th</sup> June 2019) and Test Valley Borough Council (4<sup>th</sup> September 2019) have declared a Climate Change Emergency. Both bodies are determined to reduce their carbon footprint. It seems anomalous that any reduction of greenhouse gases by HCC and TVBC would be dwarfed by burning 500,000 tons of waste each year compounded by 400+ vehicle movements each day.

It would be useful to know how many tens of thousands of miles would be driven each day in polluting diesel trucks delivering waste to the plant.

The Proposed Development will reduce the energy produced by the adjacent solar farm due to shadowing. It is perverse to reduce production of totally green carbon-free energy with an energy which also produces greenhouse gases, dioxins, nitrogen dioxide, particulates, traffic congestion and an eyesore.

### **11: Socio-economic (PEIR Chapter 16)**

Tourists are drawn to the Test Valley because of its beauty and undulating chalk downland barely an hour from London. In the same way that people seeking a peaceful walk will not choose a footpath next to a motorway, people looking for delightful views will shun an area dominated by a building with 70 - 80m chimneys. This would reduce the tourist spend in local villages' shops, pubs and B&Bs.

Highways England described the A303 as a strategic route to the South West in its A303 Stonehenge to Berwick Preliminary EIA (February 2018). It further states that enhancing the route will improve the perceptions of tourists who use the A303 to travel to the region. This proposed plant, with a site that is at the gateway to the South West, will have a negative effect on tourism and therefore the economy in the Test Valley and beyond.

### **12 Other Issues: Including aviation (PEIR Chapter 17)**

Para 7.12.1 Aviation, this paragraph is misleading. It correctly identifies the nearest airfields to the Proposed Development (PD) including the busy MOD airfield at Middle Wallop. However, it makes no mention of the helicopters from RAF Odiham (Hampshire), RAF Benson (Oxfordshire) and the Royal Naval Air Station at Yeovilton (Somerset) all of which use the low flying area for under-slung load training in the MOD Training Area to the left of the Barton Stacey/Longparish road. It also does not mention the refuelling facility that exists in the low flying area.

The requirement relating to lighting is needed due to the proximity of the application site to Drayton Down Training Area. The flue stacks proposed, which exceed 50m, should be fitted with visible aviation warning lighting (intensities of up to 200candelas may be required) in accordance with MOD specifications, to ensure that they would be readily detectable by low flying military air traffic operating in this area. In addition, lighting is also likely to be required for cranes, plant equipment or other temporary installations of structures with a height of or exceeding 50m used in the construction of the development.

**Conclusion:**

**BSPC and the residents experience of the consultation exercise to date has not been a good one. The common theme running through all aspects of the exercise highlights the inadequacies of information provided. There are numerous examples of misinformation, inaccuracies and more worryingly a number of early conclusions have been drawn without appropriate consideration.**