

From: Micheldever Parish Council

Case No: 12/02013/HCS

Case Officer: Kristina King

Closing Date for comments: November 2 extended to 9/11/2012

Location: Overton Road, Micheldever Station, Hampshire SO21 3AP

Site Ref : WR227

Applicant's Name: GML SCOTT HILL

Proposal: The construction and operation of a 8 MWE Pyrolysis Advanced Conversion Technology (ACT) plant including a 2 MWE Anaerobic Digestion Plant associated office, visitor centre, with new access road and weighbridge facilities, solar panels, associated landscaping and surface water attenuation features.

This cover letter is an explanation of the background of the rejection documents enclosed, by the Micheldever Parish Council, to the above planning application by GML Scott Hill.

In April 2012 the Micheldever Parish Council held it's Annual Parish Assembly. At that meeting, to a packed hall, a resolution was unanimously passed to reject, on the basis of the Scoping report submitted on behalf of Clean Power Properties Ltd, for an Advanced Conversion and Anaerobic Digestion Facility. The Parish Council previously submitted a rejection of this scoping report on April 9 2012.

As a result of the forceful reaction against the proposal at the Parish Assembly the Micheldever Action Group (MAG) was formed by local residents and three members of the parish council. The subsequent due diligence and research of the full planning application by this group resulted in the enclosed rejection document, this is endorsed by the parish council who have been fully involved in its composition.

The MAG committee, as a separate entity, have also submitted this document as their formal rejection of the scheme, consequently that submission will count as a separate objection letter from interested parties.

Signed,

Peter Bradley

Micheldever Parish Council

Planning Application ref 12/02013/HCS Clean Power Properties Limited

This representation is prepared on behalf of Micheldever Parish Council. Its purpose is to request that this application should be refused.

Our arguments follow.

Reduced to essentials, this application is to construct some industrial buildings on a small site in the vicinity of the rural residential hamlet known as Micheldever Station. The structures to contain complex chemical equipment to treat commercial and industrial waste in a set of energy recovery processes.

The application uses six general headings in justification. As concerned residents of the local area we offer facts and our own assertions that refute assertions in each of these six general headings.

The application asserts:-

- a) That the actual site is suitable for purpose intended.
- b) That the location of the site is appropriate.

And adds as material considerations :-

- c) That the County need for Municipal and C&I waste treatment is well served.
- d) That the technology is appropriate and safe.
- e) That the impact on the local environment is effectively nil.
- f) That it represents 'sustainable' development.

[Unless otherwise noted references relate to Hampshire Mineral and Waste Core Strategy 2007 which we understand is the relevant Development Control policy; where the emerging HMWP 2012 has relevant statements these will be referenced as such]

Micheldever Station is a compact residential hamlet of something less than 200 dwellings located almost exactly in the geographic centre of the County. Ref.3.9 Picture 3.0.1 This picture demonstrates it clearly. Attachments to this representation are current photos illustrating the essential rural, chalk downland nature of the roads, farmland surroundings and setting of the habitation.

Our starting point for objection is our reading of the 2007 Core Strategy which we reproduce in part here:-

SPATIAL VISION

Minerals and waste activities will be sized and located sensitively, such that they reduce the impact of road transport and meet the present and future needs of communities, business and the environment. Where possible such activities and uses, in order to encourage sustainable management of resources, will be co-located together, sometimes with major waste producers, to share to mutual advantage, their infrastructure and by-products. Large-scale strategic waste development will be located in or close to major areas of development.

signed on behalf of Hampshire County Council , Councillor M Kendall , Executive Member for Environment.

We note the emphasis :-“Minerals and waste activities will be sized and located sensitively such that they reduce the impact of road transport etc. ...and located in or close to major areas of development” [HMWP/ 2012 re-emphasises this - Policy 24]

SITE

Questioning that the identified parcel of land – 'the site' – is suitable for purpose, we note first that this site is not allocated or reserved by HCC for waste management purposes.

CLEAN POWER PROPERTIES MADE REPRESENTATIONS REQUESTING THAT THE EMERGING HMWP 2012 SHOULD INCLUDE A SPECIFIC ALLOCATION OF THIS LAND FOR WASTE TREATMENT PURPOSES. THE INSPECTOR DID NOT ACCEPT THIS REQUEST AND NO SUCH ALLOCATION EXISTS.

As such, we question why the applicant asserts that there was no obligation to explore other potential sites within Hampshire. The paragraphs below emphasise why any such allocation would be perverse.

1. Its current nature is one of significant and non-trivial importance to the environment. Its history, as land deliberately left undeveloped and freed from any man-made intrusion, has allowed the creation of a small but precious parcel of land evolving into a complex habitat for fauna and flora, some of which being unique to Hampshire. As such it has been designated a Site of Importance for Nature Conservation. Given the area lost to the intended development, no amount of mitigation can re-create this habitat.
2. Having no structures, now or past, it does not conform to the 'brownfield' or 'post-industrial' designation used in the application.
3. Its topology of adverse gradients and limited width would require huge excavations and much removal of materials off-site.
4. The underlying chalk would be at risk from any groundwater contamination, whatever mitigating procedures are incorporated. If pollution results it cannot be undone.
5. It does not have the capacity to co-locate other waste management infrastructure.
6. This site cannot be described as 'windfall', Its owners, Network Rail, could never had any commercial or operational use for it given its elevation and terrain tens of metres above track level.

LOCATION

Core Strategy Policies DC13, DC 8, DC 6 refer. For convenience these are included in the appendix

1. The site is not close to major sources of waste - indicated by nature of its position in the HCC economic geography. Ref. 3.9 / Picture 3.0.1
2. It is not a designated site for this purpose DC 13 (a)
3. It is not within a planned area of large scale development, employment land or co-located with complementary activities. DC 13 (c,d)
4. It is close to main lorry routes (A303 especially) but accessed only by local roads. This point is examined below. DC 13 (e) and DC 6

5. Its is very close to local residents, it will produce ongoing nuisances in a manner addressed and to be avoided as per DC 8 Para 26/27.
6. It is very close to grain storage silos (human food chain ingredients)
7. It is significantly distant from major sources of waste i.e. North East Hampshire and South Hampshire, increasing the carbon footprint that HCC seeks to diminish. Contrarily, its proximity to the A303 makes it attractive to more distant waste-collection operators from conurbations outside Hampshire.

The following four sections are, we believe, material considerations and address them as such.

NEED FOR MUNICIPAL, COMMERCIAL & INDUSTRIAL WASTE FACILITIES

The material resources strategy (Ref Section 8 8.2 vi.) emphasises the pursuance of the Waste Management Hierarchy which stresses *inter-alia* the goals of minimal landfill and minimal incineration. Incineration, by any process, removes permanently the re-use of discarded materials and must be seen as a short term option.

The applicant has provided extensive arguments regarding the contribution that the plant would make to waste management in Hampshire. We believe any such contribution should be put into context. The claims may have merit but to the extent that they do, it has little or nothing to do with the location of such a facility. **To that extent they should not be any part of justifying the location at Micheldever Station**

The treatment facilities described can be summarised as a “*small electricity generation station powered by specific kinds of waste as fuel*”. We understand that the intended facilities, specialised as they are, can only function on a partial range of total C&I arisings.

As the business of recycling useful materials continues to develop and increase in sophistication, less and less general waste will be available and/or acceptable to the plant.

References to 'low carbon' can confuse. The amount of 'greenhouse gas' (CO₂) that is released is related to the amount of carbon burned, whether oil, gas or biomass. Any advantage arises from the fact that biomass does not have to be imported and to some extent is renewable.

The application does not identify its sources of waste either by type, mix, geographic source, collector or what kind of contractual relationships it will pursue with providers and/or collectors. The lack of such data makes it impossible determine whether the nature of the project is the most efficient and appropriate for the County needs. To re-emphasise, selecting the best treatment method for these specific waste streams – all sourced largely from the major conurbations – is a quite separate decision process from that required for site selection and location.

A final concern. Given the ongoing pressure for commerce to reduce the amount of discarded materials of all kinds, the County recognises (in the 2012 plan) that waste arisings not amenable to some form of re-use are diminishing. Very considerable investment is needed for the project. **Its**

commercial viability depends on a substantial and never-ending stream of combustible waste. Surely the existence of facilities such as that proposed creates a positive **disincentive** for commerce to pursue the more demanding waste hierarchy goals.

With a working life in excess of twenty years at a time when methods for re-use and recycling are improving rapidly we argue for restraint and caution in depending on such facilities as part of the overall waste policy.

TECHNOLOGY

The applicant argues that the technology proposed is a reason-in-itself for development approval. This is not our view. The suitability of the technology should be considered independently of location. It is not a determinant of location.

The projected plant is novel. We are aware that the operational safety of the plant is a matter for the Environment Agency, which has not at this date received a submission for permit. Our concern is not one of operational safety in normal conditions, but more the potential consequences of mishaps of any kind.

There is always the possibility of equipment failure, such events are well recorded – including for example emissions control failure at the Isle of Wight incinerator. The Environment Agency has the authority to shut down plants in these cases but harmful consequences to local residents are a reality.

'Shut-down' for any reason, short or long term, will have negative local and county-wide impact. Locally this will include ambient nuisance from:- e.g. un-processed putrescent waste, vermin, fire risk, and groundwater contamination. County-wide producers of waste will encounter genuine problems of waste build-up.

Without wishing to overstate the risks, nevertheless we quote from the public consultation document “Renewables Obligation Banding Review 2013-2017”. Published by Dept. of Energy and Climate Change Oct. 2011.

“ 12.1 Advanced conversion technologies (ACT) treat waste and biomass fuel to produce syngas and/or liquid fuels which can be used to generate electricity. ACTs have the potential, in the longer term, to produce a wide range of energy outputs – electricity, heat and liquid fuels as well as biomethane and renewable low carbon chemicals. These technologies fall into two main groups: gasification and pyrolysis.

12.2 ACT experience and deployment to date is small. Gasification and pyrolysis are well known concepts that have been used in combination with homogeneous feedstocks, such as coal, for many years. However, they are still considered to be emerging and unproven technologies for the treatment of waste biomass and mixed municipal waste where there are number of technical issues to resolve, for example, achieving intended throughput and air emission standards.

12.3 To our knowledge, there are very few gasification and pyrolysis plants operating at a fully commercial scale in Europe and world-wide, although a number of international companies are working on projects, some of which are large in scale. There appears to be significant interest in ACTs in the UK and there are a number of companies looking to invest in the area.”

The applicant confirms that at the time of proposal it cannot demonstrate a comparable treatment plant of this complex inter-connectedness. While novel methods are explicitly anticipated in County and Government policy overviews, we believe that this highly sensitive site, close as it is to local housing and presenting real access difficulties, for example in the case of a fire, **should not be**

selected for what is after all something of an experiment.

A material consideration to the planning consent is the constituents of mixed waste to be treated. The restrictions on feedstock must be taken into account if one potential reason for approving the application is the size of the contribution that its successful operation will offer. The applicant correctly stresses the importance of pre-treatment, but does not offer data as to how **much / little of total waste arisings** it could accept.

The choice of pyrolysis as the reactor method of treatment involves major energy input to make the process function. A careful reading of the application shows that considerable auxiliary equipment is used for pumping, fans, motors, secondary boilers, heat recovery etc. Whilst the plant can operate from the energy provided by its generators it represents a non-trivial loss to the recovered energy that can be sent to the grid. We also note that some 80% of the waste heat generated is potentially available for community purposes – not a practicality here. This represents another reduction in the overall energy recovery efficiency which would perhaps be better used in another location. If that waste heat is lost for the next twenty years it can hardly be defined as efficient or a plus for climate change mitigation.

Safety assurances in the application are based on models selected by the applicant. They leave residents dependent on the professional guidance available to HCC. In the light of the DECC report above this may be difficult to achieve. Council members should be provided with robust, independent data on operational and environmental risks, health and safety issues. Without these, they face an unsatisfactory base on which to make their decision concomitant with their duty of care to residents.

We understand that the current regulatory position allows planning approval without the applicant having prior receipt of the obligatory permit from the Environment Agency. Given that the HCC has responsibilities for both development control and environmental well-being of its residents we find this puzzling in such a complex and inherently sophisticated proposal.

We ask that HCC development control officers and those from the Environment Agency view and assess this application in tandem, recognising as we do that the considerations and implications are inextricably entwined.

LOCAL IMPACT

Considering all of the above concerns and conflicts with policy, new and extant, we find it inconceivable that this particular rural, domestic site would be considered remotely suitable, especially for a project that is novel and not without significant potential hazards. 'Why this?' and 'why here?' are the obvious questions that local residents in and around Micheldever Station and nearby Coxford Down, quite understandably, are asking of the County. Feeling that they are 'guinea-pigs' for this technology complex is inevitably a major concern and one with which most Council County Members will surely agree.

As noted above the local community is small, traffic volumes generally low even at 'employment times'. Large vehicles in the main are associated with the farming activity which is the dominant activity in this intensely agriculture area.

The four roads that intersect the village Overton Road (North-South) and Larkwhistle Farm /

Andover Road (East-West) are not wide, commercial vehicles cannot pass easily. The main rail line running through the centre-line is an accepted reality and its low-profile offers little nuisance. The very high traffic volumes needed to support the planned facility will never be just a trivial nuisance but a very real hazard.

It is centred on farmed land, its crops going into the human food chain. Extra pollution of any kind is not to be welcomed. The bulk of arriving waste is expected to have a high proportion of biomass, much of it undoubtedly putrescent. Bring this by large open vehicles into the centre of farmland seems perverse and ill-advised.

The effective loss to commercial opportunism of the unique wild-life habitat should not be lightly regarded. The mitigation measures in the application would come too late after the fifteen-month long construction phase. The damage will have been done and irrevocable.

The applicant states that there will be a net loss of calcareous grassland. Is the scheme thus also contrary to Policy CP6 (Biodiversity) of Winchester City Council's Core Strategy Preferred Option, which states that 'the City Council will support development that **protects and delivers a net gain in biodiversity**? Government policy on minimising impacts on biodiversity set out in the National Planning Policy Framework (NPPF) paragraph 118, requires local planning authorities to aim to conserve and enhance biodiversity when determining planning applications ..." We argue that this supports our claim that this site should not be developed.

No matter how elegant the process buildings and the stacks are designed and constructed, they are still there, visible, inevitably noisy - even only from diesel-engined traffic and impossible to be entirely free from process smells and gases. The applicant's use of the wind-rose to suggest that the nearest residents are usually 'upwind' ignores the 20-30% of the time when they are not.

We argue that the local impact is a very 'human' thing which cannot be addressed or evaluated by extensive spreadsheets and percentages but should be a major reason for refusal.

SUSTAINABILITY

Sustainability as used in development control tries to encompass three considerations, all being somewhat subjective – 'Economy'; 'Society'; 'Environment' Under 'economy' we ask a simple question;

IF THIS IS A SUSTAINABLE DEVELOPMENT, GOOD FOR THE COUNTRY, WHY IS THE APPLICANT COMPANY REGISTERED IN THE ISLE OF MAN?

The emerging HMWP 2012 states:-

Sustainable waste management requires policies that are in line with national objectives that:

- . support initiatives to prevent waste and make the best use of waste resources (guided by the waste hierarchy);
- . provide sufficient facilities to deal with the waste arisings (net self sufficiency);
- . help implement national and local waste strategies and complement other guidance;

- . help secure the recovery or disposal of waste without endangering human health or harming the environment, and enable waste to be disposed of at the nearest appropriate facility;
- . reflect the concerns and interests of communities and the needs of waste collection and disposal authorities and business, and encourage competitiveness;
- . protect green belts but consider the wider environmental and economic benefits of sustainable waste management;

We argue that the application, if allowed, would fail to accord with these.

- (i) Its location is insensitive to habitation and to the wider natural environment;
- (ii) Its processes i.e. pyrolysis/incineration are not a long term goal – they work against the waste hierarchy;
- (iii) Much of the recovered energy is lost within the processes;
- (iv) Its location is insensitive to sources of waste;
- (v) Its commercial viability depends on state subsidised energy tariffs which are time limited;
- (vi) It provides little economic benefit to residents, or Hampshire as a whole. The major economic benefit will flow elsewhere, even out of the country;
- (vii) It is at commercial risk of falling waste arisings.

Such a list hardly 'reflects the concerns and interests of the communities'.

It does little for the economy, most profits accrue outside Hampshire,
It does nothing for society, only nuisance, especially in the locality,
It does harm to the environment.

WE SINCERELY TRUST THAT HAMPSHIRE COUNTY COUNCIL WILL REJECT THIS UNWANTED AND UNWARRENTED APPLICATION.

Signed on behalf of Micheldever Parish Council

Peter Bradley

APPENDICES

Core Strategy references used above.

DC6 - Highways

Major mineral extractions, landfills and 'strategic' recycling, aggregate processing and recovery and treatment facilities, will be permitted provided they have a suitable access

to and/or route to the minerals and waste lorry route as illustrated on the Key Diagram. In all cases, minerals and waste development will only be permitted if it pays due regard to the likely volume and nature of traffic that would be generated by the proposal and the suitability of the proposed access to the site and of the road network that would be affected. Consideration should be given to highway capacity, road and pedestrian safety, congestion and environmental impact, and whether any highway improvements are required and whether these could be carried out satisfactorily without causing unacceptable environmental impact.

DC8 - Pollution, health, quality of life and amenity

Minerals and waste development will only be permitted if due regard is given to the pollution and amenity impacts on the residents and users of the locality and there is unlikely to be an unacceptable impact on health and/or the quality of life of occupants of nearby dwellings and other sensitive properties. Where necessary minerals and waste developments should include mitigation measures, such as buffer zones between the site and such properties

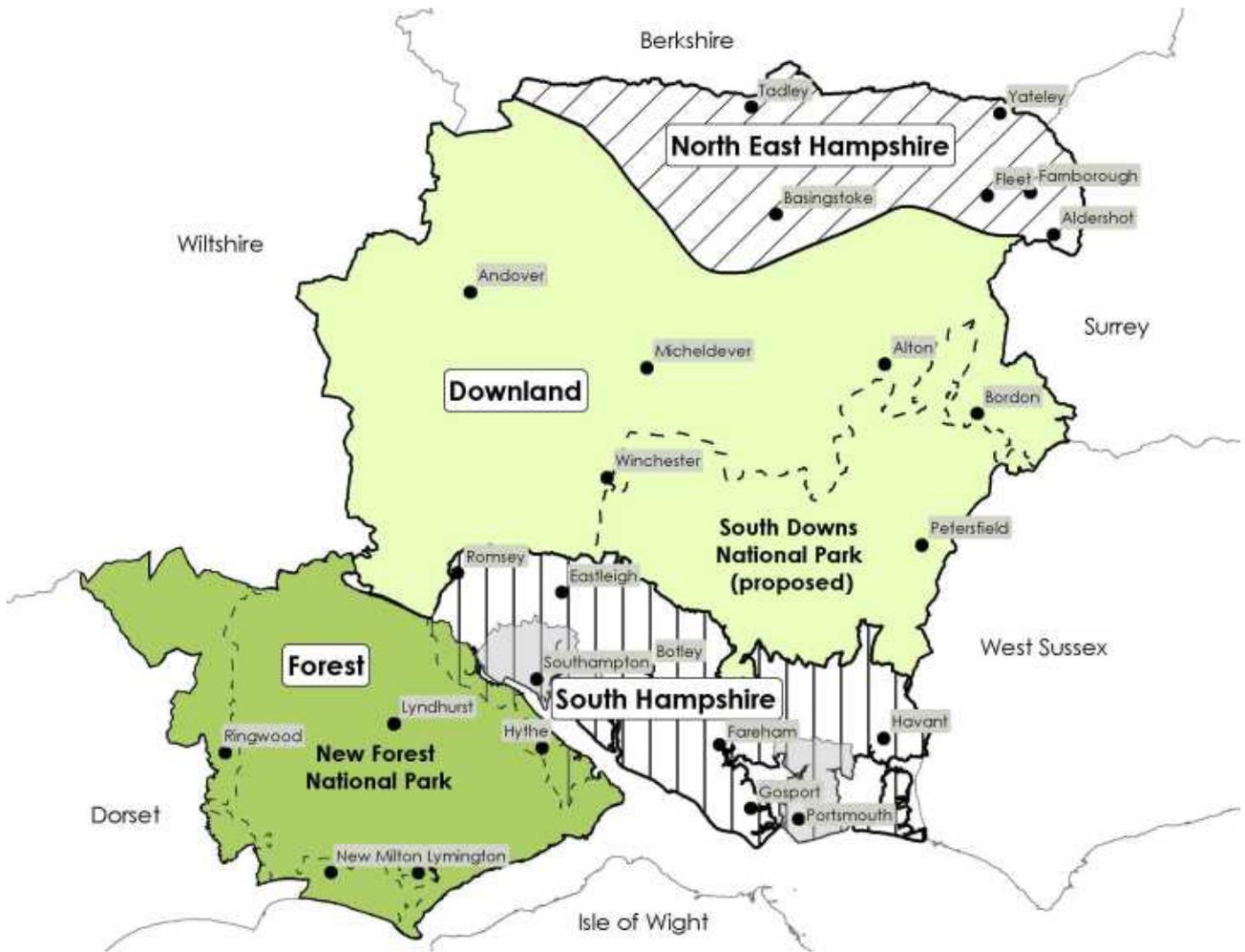
DC13 - Waste Management and Recycling (including Aggregate Recycling Facilities)

Waste management developments (excluding landfill) will be permitted provided that the site:

- a. Is identified as a site, or within an area suitable for waste management uses, in the Hampshire Waste Management Plan or Minerals Plans, or
- b. Re-uses/redevelops previously developed land and/or redundant agricultural and forestry buildings (including their curtilages), or
- c. Is within a planned area of large-scale development, or
- d. Is on employment land, preferably co-located with complementary activities, and
- e. Has good access to, the minerals and waste lorry route as shown on the Key Diagram, and where possible, the site enables the use of water-borne and rail freight, and
- f. In the case of recovery and treatment sites, incoming waste shall be subject to pre-treatment, either on or off site to maximise the potential for recycling, and where technically possible, energy will be generated and used and the by-products, including heat, will be reused or recycled, and
- g. In the case of sites providing public access, the site shall be accessible for use by disabled people.

HMWP 2012 policy 28

- c. Development carried out predominantly in enclosed industrial premises should be:
 - i. on industrial estates suitable for general industrial uses; or
 - ii. on previously developed land suitable for general industrial uses, or other land that is allocated or permitted for general industrial or employment purposes; or
 - iii. on suitable sites with good transport access within major planned development areas; or
 - iv. on suitable, small scale sites in the countryside that meet Policy 4 (Protection of the countryside



Micheldever Countryside



Could it be any more rural?



The rural rail



The village



This silo stores your food!



Brownfield?



Overton Road squeeze