



The Test & Itchen Association Ltd

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Dear Wheelabrator

TEST AND ITCHEN ASSOCIATION RESPONSE TO WHEELABRATOR HAREWOOD CONSULTATION

I am writing as the Executive Director of the Test and Itchen Association, a membership organisation which has been representing the interests of the owners of the River Test and River Itchen and their tributaries for more than 100 years. Our members between them own more than 90% of the two rivers, including almost all of the Upper Test and the Dever in the vicinity of the proposed Wheelabrator development at Barton Stacey. The Association is deeply concerned about the potential environmental impact of this proposed development to which it strongly objects.

The principal objective of the Association is to conserve the waters of the Test and Itchen, two iconic chalkstreams of global significance, reflected in their Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) status. Our members' main concerns, both generally and specifically about this proposed development, are over water quality and water quantity. The proposed site lies within 1km of the River Test and River Dever. It sits on top of the chalk aquifer on which these two watercourses depend for their flow, with groundwater levels less than 10m and sometimes as little as 2m below the ground surface.

The proposed development would constitute both an immediate and potential threat to water quality with significant and long-term consequences:

- The latest plans suggest the huge main facility will extend 4m below ground level with the foundations and foundation piles presumably far below that. The construction of the site will therefore impact directly on groundwater. The mitigations outlined in the Preliminary Environmental Information Report (PEIR) to prevent groundwater contamination during the construction process are generic, superficial and unconvincing.

- Once in production, the site would incinerate up to 500,000 tonnes of waste per annum. This incineration could be expected to generate up to 125,000 tonnes of bottom ash per annum which would be treated in the existing Raymond Brown Bottom Ash Treatment Facility on the same site. This site currently handles in the region of 100,000 tonnes per annum of bottom ash from other waste to energy facilities in the region. The amount of bottom ash treated at this location would therefore more than double. There is no indication in the proposal documentation that the site has this additional capacity.
- There is no description in the proposal documentation of the safeguards in place at the existing bottom ash treatment plant to prevent groundwater contamination from the leaching of toxins from the highly toxic bottom ash – it is usually dumped on the ground for 6-8 weeks before treatment. There are concerns that the membranes typically used to contain the leaching of toxic materials out of waste sites are ineffective.
- The PEIR admits to a rudimentary and incomplete understanding of the hydrology of the chalk aquifer lying immediately below the site. It is presumed – logically - that groundwater would flow generally West South-West towards the confluence of the Test and Dever. It is therefore highly likely that any contaminated groundwater would find its way into these two chalkstreams.
- The PEIR refers to the possibility of a winterbourne flowing at times of high groundwater levels from the vicinity of the site southwards to the Dever. There is therefore also a possibility of surface water from the plant site, both during construction and operation, flowing directly into the Dever.
- Effluents from the chimney stacks could cause local ground contamination which would find its way into protected water courses. There is some evidence of ground contamination around existing similar facilities.

The impact on river flows in the Test and Dever of the proposed facility are hard to establish as the information on the water requirements of the facility provided in the consultation process have changed over time and have at best been rudimentary. The experts made available during the recent public consultation exercise were unable to answer convincingly, if at all, basic questions on the water requirements of the facility. The PEIR suggests the facility will have a requirement of 135,000 m³ of water per annum and this will be supplied through the existing Southern Water network. It suggests the water resource implications of the site during construction and operation are “Insignificant” or “Negligible”.

Even if the latest water requirement figure is correct – and given the large water requirements of existing waste to energy facilities that is a big if – 135,000m³ of water is not insignificant. Hampshire is an area of water shortage. Over-abstraction of the Test and Itchen rivers and groundwater from the chalk aquifer catchment led to new abstraction licences being imposed on Southern Water in 2019 following a Public Inquiry in 2018. River flows in the Test in the summer of 2019 were at close

to historic lows, leading to Southern Water applying for and being granted in September 2019 a River Test Drought Permit. Any proposal that places significant extra demands on Southern Water will add to an already critical problem.

The PEIR has very little to say on how the proposed facility would be connected to the national grid. The assumption seems to be that it would be connected to the grid in the Andover area which would require cables to be laid across the Test valley. There is no evidence that the potentially serious environmental impact of this work has been considered. Nor is there any evidence that the consent - or even views - of the landowners concerned have been sought.

Given the Association's objectives and membership, this submission has focussed on the water quality and water quantity implications of the proposal. But the Association and its members have a number of other fundamental concerns. These include:

- Need. Hampshire already has three waste to energy facilities which between them handle 90% of Hampshire's household waste. There is no requirement for an additional waste to energy facility in Hampshire.
- Location. Building such a colossal facility – twice the size of Winchester Cathedral - on a greenfield site in an area of outstanding natural beauty would be an act of gross environmental vandalism.
- Infrastructure. Such facilities are typically built in industrial locations where the infrastructure they require is already in place. The existing Wheelabrator facility at Ferrybridge in Yorkshire is on the site of a former coal-powered power station with all the required connections to the national grid. The Veolia facility at Marchwood in Hampshire had existing port and railway connections. Harewood has none of these grid or transport connections. The PEIR suggests that the heat generated by the facility could be used by nearby industrial and commercial users. There are no such users.
- Transport. Any regular user of the main arterial road links in the vicinity – the A303 and the A34 – would tell you that they are already often unable to cope with existing volumes of traffic. Adding 400 HGV lorry movements per day to existing traffic volumes will exacerbate an existing problem.

In summary, there might be a place for waste to energy facilities as part of a developing, national, energy provision mix - although many well-qualified commentators have their doubts about waste to energy facilities on carbon footprint, pollution and more general policy grounds. But Harewood is definitely not the place for such a facility, even if the requirement for an additional waste to energy facility in Hampshire exists. It would represent a threat to chalkstreams of global importance. The Upper Test and Dever are already under serious pressure from low water quality and low river flows – Harewood would add significant risks to an already perilous situation. Application of the well-established precautionary principle would suggest that this proposal should

not be allowed to progress further – there is no clear need, there are serious real and potential risks, and the mitigations are inadequate, ill-defined or unidentified.

This submission to the consultation process has been approved by the Association's Board of Directors.

Yours sincerely

Jeremy Legge

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