

Hi James

I have received the below comments from the EHO.

Thank you for your consultation on the above application. The application is for a variation of planning permission WSCC/026/22 (Condition 2) to allow acceptance and handling of dog waste from Horsham District Council at Crawley's Waste Transfer and Recycling Center, Metcalf Way.

The application does not provide an odour assessment or transport assessment to support its application and as such there is no technical information on which to base our comments with regards to the potential for odour and transport impacts associated with this facility. However, the Planning Statement (March 2024) submitted by Biffa provides a description of the process, handling techniques and facilities which it considers sufficient to minimise the risk of odour.

My main concerns regarding the significant increase in throughput which is being proposed at the Crawley site are:

The original application was for a weekly tonnage of approximately 4 tonnes of dog waste from the Crawley district, spread over a 6-day week (Mon-Sat). The new application would double this amount. This substantial increase in the waste stream may put additional operational pressure on the facility resulting in longer periods of container storage outside of the WTS. This may lead to higher risk of odour.

The site is regulated by the Environment Agency through an environmental permit. I have not seen any consultation feedback from the Environment Agency on this latest variation proposal. However, I would expect the Environment Agency to assess the suitability of this site for the increased waste stream, including whether existing facilities at the site are able to cope with the additional doubling of capacity, including an appropriate odour management plan for the control of odour, leachate and flies.

The increase in vehicle movements associated with the original application for dog waste collections from Crawley was estimated to be an extra 3 to 4 deliveries or 6 to 8 two-way vehicle movements locally per week. Whereas the additional Horsham waste stream is estimated to generate approximately 11 deliveries or 22 two-way vehicle movements per week over a much greater distance. It is unclear why a similar tonnage of dog waste per week will result in an almost doubling of vehicle movements from the Horsham collections, and if these vehicle movements will be travelling through Crawley's AQMA.

The proposed change to condition 2 does not appear to be in line with the Council's sustainability objectives or address policy INV3: Requirements for Sustainable Transport. Instead of transporting the waste over large distances from Horsham (which covers a very large geographical area), continued disposal at the Hop Oast Depot in Horsham should be considered, by providing the correct apparatus and machinery to competently handle the dog waste streams from Horsham district rather than the unsustainable transport of the waste out of district.

Thanks

Alex

Alex Sanders
Acting Principal Planning Officer

Crawley Borough Council

01293 438038

www.crawley.gov.uk/planning