

West Sussex County Council

By email [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

10 April 2018

Dear Sir/Madam

**WSCC/015/18/NH – FORMER WEALDEN BRICKWORKS (Site HB), LANGHURSTWOOD ROAD, HORSHAM – recycling, recovery and renewable energy facility and ancillary infrastructure**

Thank you for your notification letter dated 16 March 2018.

Mole Valley District Council (MVDC) is the neighbouring authority to the north of the area where the site is located. There are a number of villages including Ockley, Capel, Beare Green, Newdigate and Leigh within a few miles of the site, and the market town of Dorking is only a little further away to the north. The A24 runs from close to the west of the site and is a major north-south route through Surrey from Sussex, including access to the M25 and the wider motorway network.

Residents in the southern part of Mole Valley have previous experience of energy from waste facilities with proposals for a waste incineration plant having been made at the Clockhouse Brickworks south of Capel in 2000 and again in 2007. On both occasions strong local opposition, including legal action, contributed to the schemes being withdrawn. Given the proximity of the site to the southern part of Mole Valley, and previous concerns about incineration as a form of waste disposal, MVDC has the following comments to make on the application.

**Traffic**

It is noted that the potential impacts of traffic generated by the proposal have been assessed; but the assessment only extends a few hundred metres from the Great Daux roundabout (A24/A264). Heavy goods vehicles, including during the construction phase, are likely to be drawn from a wide area concentrated on the primary road network, including the A24 and therefore have traffic impacts in Mole Valley. The A24 has a varied accident record, with concentrations around certain junctions, including the elongated roundabout at Beare Green. It is considered that West Sussex County Council (WSCC) should take into account the accident record on this route and the wider impact of heavy goods vehicle movements when considering the application.

Consideration should also be given to instances when the primary road network is blocked or congested leading to heavy goods vehicles attempting to drive through the rural road network, and the consequent damage this might cause to rural locations. This is of particular relevance to Dorking, where heavy goods vehicles containing waste queuing through an already congested road system would have a detrimental impact on the historic market character of the town.

If the application is approved, it is considered essential that conditions should be attached which limit the routes used by heavy goods vehicles accessing the site, and that these routes should avoid Dorking town centre and the villages to the south.

### **Air Quality**

There is acute concern from residents living in the southern part of Mole Valley about the potential adverse effects on health from incinerating waste. The Environment Agency (EA) and WSCC both have roles to play in relation to air quality, which should include detailed and critical appraisals of the health impacts of the facility. It is crucial that the proximity of Gatwick Airport and aircraft arrival and departure routes are factored into the modelling of dispersion from the facility. WSCC has a remit in its statutory role as the Waste and Minerals Planning Authority to also consider broader material considerations such as the impact on the environment and the character and amenity of the area.

Even if the effect on health can be mitigated, the fear of health impact can, in itself, be a material consideration. These matters, both individually and in combination with other sources of pollution such as aircraft and traffic movements, need to be analysed together.

We consider that the development should not be allowed to proceed unless both the EA and WSCC are able to demonstrate that the health concerns can be overcome; and that it is clear how monitoring and enforcement of emission standards will be conducted independently of the operator.

### **Landscape Impact**

The southern area of Mole Valley is rural in character with far reaching views across it from the Surrey Hills Area of Outstanding Natural Beauty (AONB). The zone of visibility for the site coincides with this nationally recognised landscape area. The Surrey Hills AONB Management Plan Policy LU5 seeks to give particular attention to development impacts on ridgelines, public views, tranquillity and light pollution.

The reduced height of the main building is noted, but the sheer size of the facility means it would be visible from a wide range of surrounding viewpoints. In particular, the chimney stack would be a significant physical feature in the landscape and visible in views from the Surrey Hills AONB and wider countryside in Mole Valley. For safety reasons, it would have to have aircraft warning lights attached, which would reinforce its visibility in the landscape. Given the extensive visual impact of the development we consider that WSCC should undertake an independent landscape assessment to gauge the potential effect on the nationally significant landscape and the character of the rural area.

We ask that these points be taken into account as part of the consideration of the application by WSCC. In particular, we ask that you take seriously the concerns of residents in the southern part of Mole Valley. While not immediately adjoining the site, the size and nature of the

proposed development is such that there is a real risk of traffic, health concerns and visual impacts having a significant effect well beyond the immediate environs of the site.

Yours faithfully

*Guy Davies*

Guy Davies  
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