Comment for planning application WSCC/011/21

Application number Name

WSCC/011/21

Joan Grech

Address

GREYSTONES, MELTON AVENUE, MELTON AVENUE, PULBOROUGH, RH20 4BH

Type of Comment Comments

Objection

Energy Recovery / Energy from Waste (EfW) is not a low carbon emission option. In the Climate Change Committee (CCC) Sixth Carbon Budget report on Waste the CCC highlights the '...significant growth in fossil emissions from EfW plants.' The CCC's options for reducing emissions from all waste treatment methods include waste prevention and recycling to reduce the volume of waste to be treated. For EfW plants the CCC additionally recommends the installation of carbon capture and storage (CCS). It recommends that all new waste conversion plants, including incineration, must be built CCS ready, and that all existing plants are retrofitted with CCS from the late 2020's and by 2050. I could not find any reference to CCS in the application documents. While EfW is a poor option for helping to achieve net zero carbon emission target compared with waste reduction, reuse and recycling in a circular economy if it is considered to be necessary the applicant should include Carbon Capture and Storage (CCS) within their proposed development or they should propose a planning condition requiring the use of CCS within a specified timeframe - preferably as early as possible. The health issues around waste incineration are complex and controversial. While many studies have not found conclusive evidence of health risks modern EfW plants a fairly recent study reported in the Australian and New Zealand Journal of Public Health 'The health impacts of waste incineration: a systematic review' 18 September 2019 concluded that: 'Older incinerator technology and infrequent maintenance schedules have been strongly linked with adverse health effects. More recent incinerators have fewer reported ill effects, perhaps because of inadequate time for adverse effects to emerge. A precautionary approach is required. Waste minimisation is essential.' As, in terms of options to address waste, incineration is only second to landfill as the least favoured option, the Planning Authority should adopt the precautionary principle and seriously consider whether it can encourage or facilitate more favourable options in the waste hierarchy to reduce or eliminate the need for waste incineration. The plant will visually impact the surrounding area and the view from the South Downs National Park. This would conflict with the West Sussex County Council Waste Local Plan (WLP) Policy W11. The height of the building, in particular the chimney stacks, would be significantly different from other developments in the area and potentially in conflict with WLP Policy W12b. I note that land adjacent to the proposed site, at Ford Airfield, is designated as a site for the potential development of 1500 dwellings plus a primary school, a care home, leisure facilities and allotments. A EfW plant in the immediate locality is more than likely to put off potential buyers and may result in the District needing to identify an alternative site for a large housing development in order to meet its housing provision obligations. Should the Ford Airfield development proceed as planned alongside the EfW there will obviously be increased traffic from the new housing estate and HGVs accessing the EfW plant with the resulting issues of increased pollution, risk of accident, damage to roads and other local infrastructure etc. Waste management facilities are at risk of fire due to the combustible nature of waste materials, including items that should not have been disposed of as household waste. A significant fire at the proposed EfW facility could result in serious disruption to local residents and businesses and create a health hazard. This needs to be taken into account when considering this application.

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Attachments