

Objection to Planning Application WSCC/011/21

The above application is the second application for a EFW facility on the Grundon/Viridor ford airfield site. It has sought to address some of the issues raised against the first application but has not addressed them all and still does not address the issues of using this site for any further waste development.

Government Guidance (Ministry of Housing, Communities & Local Government Guidance para 047 reference IF 28-047-20141016) states:

“The Waste Planning authority should not assume that because a particular area has hosted, or hosts, waste disposal facilities, that it is appropriate to add to these or extend their life. It is important to consider the cumulative effect of previous waste disposal facilities on a community’s wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local communities affected by previous waste disposal decisions will help in these considerations”.

There is a vast array of local objection to this proposed facility based on 5 key factors:

- Visual damage to the landscape, including light pollution, particularly to the South Downs National Park, the coastal plain and local historic edifices.
- Incompatibility of proposed new housing development close to the site with an enlarged EFW facility
- Lack of local need for more incineration, rather than enhanced recycling
- Harmful noxious gases and emissions harming air quality
- Lack of highway infrastructure to accommodate the size and weight of the larger and heavier HGV movements being proposed both inwards with material and outwards with residual ash waste

Incineration is the worst and dirtiest form of waste management and energy production. It is not a green source of energy. This proposed incinerator will produce ‘dirty’ electricity’ rather than the clean electricity of wind farms. Although West Sussex has moved a long way in terms of its recycling programme, we should be doing more and more recycling over time, given that recycling nationally has stalled at around 45% on average and approximately 60% of incinerated material could be recyclable. Recycling is relatively expensive compared with the cheaper option of incineration. But incineration is impacting the health of our residents. Industrial and commercial waste will be a large component of the waste managed at the proposed new incinerator. However, the organisation also foresees managing some domestic waste if capacity is available.

It has been reported that more than half a million tonnes of household recycling has been rejected at the point of sorting in 2019/20 because of non-recyclable materials being placed in household bins. When the waste incinerated has a high content of PVC disposables (eg hospital waste and badly sorted domestic waste) the carbon output is worse for the environment than burning coal and our carbon footprint is dramatically adversely impacted. The national guidance includes moving away from coal fired energy but energy produced in incineration is just as bad or worse. Figures for 2019 show the total carbon emissions from incinerators were 12.6

million tonnes of CO₂. However, this is not the full picture and probably only represents half of their total emissions, as incinerators only have to publish CO₂ emissions from burning fossil waste like plastic not the total emissions such as biogenic CO₂ from food and garden waste. A report by the environmental law charity Client Earth, commissioned by Eunomia : Greenhouse Gas and Air Quality Impacts of Incineration and Landfill, predicts that incineration will become a more carbon intensive process by 2035 than even landfill.

Depending on the technology, operating conditions and composition of waste incinerated, diverse pollutants are formed and emitted in flue gas including particulate matter, acids & other gases, heavy metals and carbon compounds. Best practice says that reducing chlorine wastes such as plastics (PVC) must be avoided.

The planned flue cleansing technology proposed in this current application in order to deal with the reduction of noxious nitrogen oxide (NO_x) is Selective Non-catalytic reduction (SNCR). NO_x emissions have a high impact on the onset of disease leading to loss of life or permanent damage to living organisms and long term chronic illness such as cancers. The choice of SNCR as a cleansing technology is based largely on simplicity of installation, low capital and operating cost and lack of necessity to replace expensive catalysts. It is not considered in the industry to be suitable for large-scale NO_x reduction and is prone to ammonia slip which leads to accidental NO_x emissions and on removes something between 30% and 70% of NO_x. SNCR also needs far greater flue gas temperatures at the point of injection and is therefore more prone to accidental fires, examples of which are recent ad hoc fire outbreaks in Lewis, Newhaven, Beddington lane Croydon and in Norfolk. There is currently research ongoing identifying all the ad hoc fire outbreaks across all incinerators in the country. In addition, current research indicates that SNCR cleansing technology might not ensure compliance with future regulations world-wide.

An alternative cleansing technology is Selective Catalytic Reduction (SCR) which is arguably the most widely-used technique for NO_x reduction. It is classified as an after-treatment solution for emission control and is suitable for large-scale NO_x reduction of up to 90%. This technology has been used in newer incineration plants around Europe and the world including the new plant opened in Singapore in 2020, who have also insisted on using an advanced Wet Flu Gas Treatment system to ensure the cleanest possible air emissions. Having said this the Singapore local authorities have still insisted on building a man-made island over the sea away from the city to protect its residents, rather than locating it a few hundred yards from a proposed new housing development and other homes and buildings currently in place.

A further issue associated with incineration is the fly ash residue left after the process has been completed. Fly ash generated at waste incinerators is usually contaminated with heavy metals and other dangerous substances and have to be treated as a hazardous residue before use or disposal into landfill.

There has been no attempt by Grundon Viridor to address immediate environmental and health aspects associated with their plan or the impact of truck movements to and from the site. Some examples of shortfalls in their application include:

- No secure storage of ash/clinker on site which as a result of wind and water courses could lead to contamination of surrounding areas
- No plans for storage of any flammable materials which might present a risk of fire
- No provision for storage of odorous organic materials where the current situation means plagues of seagulls frequent the site because of stinking organic waste being exposed to the air.
- Little attempt to address the movement of low calorific value waste movements by truck potentially from boundaries beyond West Sussex.
- No attempt to justify bigger and heavier vehicle movements to an area which does not have a full 360 degree radius with the sea to our south.
- Little information on the impact of CO2 emissions and no environmental audit of the proposed site to show net environmental benefit.
- No proposals to offset CO2 emissions by tree-planting or ensure the production site will be wholly carbon neutral
- No indications of ensuring vehicles will be equipped with the best available particulate technology and NOx emissions control devices in order to protect local residents from exhaust pollutants.
- No indications that commercial light-duty vehicles will be fully electric to limit emissions in the local neighbourhood.
- No recognition that coarse particle emissions from brakes and tyres of large heavily laden vehicles will be minimised given that this is one of the greatest threats to public health from these large heavy vehicles.
- No recognition of the local impact of significant road deterioration, poor road surface quality mitting high levels of traffic noise, and pothole creation beyond current experiences.
- No management plan for minimising debris spill from moving vehicles, littering and polluting local private and public green areas.
- No recognition of the 85 m high twin chimneys creating large visible plumes, which during particular weather conditions will result in water vapour condensation, which will lead to significant anxiety of local residents in the downwind area. This plume could be huge and visible for 10 miles or more creating an eyesore in the locality.

The reliability of Viridor in particular to adhere to identified standards is also questionable. In April 2021 legal proceedings were issued against Viridor ‘for various alleged emissions from the plant which include noise, dust, smells and steam’.

It is of course realistic to accept that we have to do something with our waste. West Sussex will already have done its share of hosting such facilities in the South East when the plant in Horsham comes into being, a fact that Grundon Viridor are ignoring because the building plans and works are only in their initial phase. However, the work has already started on that facility and it will be in place managing our waste in a short period of time. There are also plans for an incinerator plant in Hampshire at Alton who are planning to use technology which ensures 78% emission cleansing. Both these facilities are planned to be less conspicuous than the proposal at Ford as the building locations are half hidden in undulating countryside rather than the totally

flat coastal plain at Ford where a building even of the reduced size proposed will stick out like a sore thumb and damage the landscape dramatically.

Various European Countries including Denmark and Germany are looking closely at increasing recycling due to the harmful impact of incineration and bringing in a tariff scheme through the use of Emissions Trading Systems (ETS), to cap the total level of greenhouse gas emissions and to offset carbon and NOx emissions thus reducing commercial benefit and discouraging incineration. An alternative incentive to become more environmentally friendly is to levy a carbon tax which directly sets a price on carbon by defining a tax rate on greenhouse gas emissions and carbon content. Even Wales has stated that it will put a moratorium on large new waste-to-energy plants and consider an incineration tax, which would detract from the lucrative profits currently associated with incineration and force us to look more closely at recycling opportunities.

In relation to reasons for objecting against this current planning application, the inspectorate at the Horsham EFW plant stated that the main issues to be considered were:

- Whether the proposal would be consistent with the aims of local and national waste management policy
- The effect of the scheme on the character and appearance of the area
- The effect of the scheme on the living conditions of the local community with particular reference to public perception of harm to health in relation to air quality
- The effect on the significance of heritage assets, and if there is harm, whether it would be outweighed by the public benefits of the scheme.

I would suggest that these reasons, when taken in the context of the proposals at Ford, show this planning application to be totally compromised. The scheme will adversely affect the character and appearance of the area, the living conditions of the local community will be compromised, public perception of harm to health in relation to air quality is already affecting residents mental health and there would be adverse impact on close heritage assets. I would also assert that the local waste management policy in relation to Ford and its location should be reviewed as soon as possible, given that it is no longer valid in this location

Grundon Viridor are merely looking for potential commercial gain not taking responsibility for the health and welfare of our communities. That is the Planning Committees responsibility and I urge that you take care of our residents rather than encouraging commercial gain by this consortium on this planning application.

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