

Dear Mr Crow,

I would respectfully ask that you read the following in conjunction with the report prepared by WSCC planning officials with regard to the planning application for a waste incinerator in Horsham.

I would like the planning committee to be aware, that the local opinion is overwhelmingly that this development is not suitable for the locale, despite the planning officials' views on the application. 1189 residents have taken the time to write in to object (an overwhelming 99% of the total received), and a further 4532 petitioning signatures collected. This broadly reflects local views collected, but not evidenced, who felt any efforts on their part to object would not make a difference and hence took no action. The key decision for the committee, we believe is the balance between the **Benefit of this development and technology vs the Local impact. The locals believe the benefits case does not outweigh the local and environmental impact.**

Of most concern is that the developer has submitted an application for a 3Rs facility which is suggestive of "recovery" (80%) in terms of the waste hierarchy, when analysis performed by both UKWIN and local residents with relevant expertise is that this application will be unable to meet the strict criteria for recovery or R1 status under the EU Directive 2008/98/EC and as a result should be treated as a **disposal** application. Disposal waste processing is in line with landfilling activities and therefore right at the bottom of the waste hierarchy. This is the least desirable and least sustainable/ environmentally friendly option for dealing with West Sussex waste. It also cannot be stopped once in operation, and so any vote for permission to be granted is in effect a vote for the least desirable form of waste disposal for 25-30 years. This is not something Horsham wishes to support; there is a clear preference that an approach similar to municipal waste is adopted for C&I waste streams to focus on avoidance, re-use and recycling. **The "recovery" vs "disposal" is a key planning consideration which has failed to be addressed by the planning officials. This needs to be addressed before a decision is taken.**

The second point of concern is the need to bring in £230,000 tonnes per annum of waste to Horsham. Although West Sussex report there is an estimated 950,000 tonnes per annum of shortfall in West Sussex for C&I, if you deduct the material which cannot be burned, material that could be recycled, reused, it is estimated this would leave only 89,000 tonnes per annum. By permitting this particular development with a capacity for the equivalent of 2 counties of waste to be burned will not only be in contravention with WSCC Waste Local Plan (which is all about only addressing West Sussex's needs in a sustainable way) but will also encourage cross boundary waste movements from the Southern Counties and further which the applicant has referenced. With this being a purely privately owned and run incinerator, there is no guarantee West Sussex's needs will be met as the driver will be market forces rather than local needs for a sustainable solution to waste processing. Will this lead to over-capacity issues as each county puts similar provisions in place? - if so waste will need to be transported over even further distances as seen in Europe where they are importing in waste from overseas! We should also not assume attitudes and behaviours will not change. The MBT modelling is a good example of that where it was assumed investment was needed for over 300,000 tonnes per annum. Food waste has reduced leading to a reduced need of 60% of

that anticipated. C&I waste is also not monitored and it is widely known that information on capacity is highly likely to be incorrect.

The last point is the insufficient consideration of air quality and the evidence put forward by the applicant. It has been noted that key calculations are wrong and in-particular for Co2 and NO2. The calculations which suggest a lowering of carbon in comparison with landfill is wrong by virtue of their calculations being incorrect by a magnitude of 1000. The correct calculation, based on government guidelines of how to calculate this, suggests this incinerator is worse than landfilling in terms of Carbon Dioxide- a key component of climate change. The longer-term prognosis is that this decision will lead to is an inability for the govt to achieve the reduction of Co2 from the electricity supply in the UK as it seeks to moves to carbon neutral status. The NO2 calculations again are incorrect, and the claims of saving are frankly misleading. The permission being relied on to discount the vehicle impact of the incinerator from 2015, was permitted on out of date data (2013 data) and with little air quality data from the actual site/ area (an air quality monitoring site in Park Way is used which has limited collection capabilities).

Relying on the Environment Agency to “control” after the event rather than confirming the full extent of the area impacted up front is irresponsible and indefensible and is a core part of the planning process to assess upfront. There are parts close to Horsham which have Air Quality problems who will find it unacceptable to permit additional pollutants which could further add to the poor air quality which have not been considered at all- Crawley is one such area.

I would like the Planning Committee to consider in their decision making:

- **Insufficient assessment by the planners of what type of waste processing business this is (recovery vs disposal) and the long- term nature of this decision. The mood music nationally and more globally is that large-scale incineration is not the right answer today let alone in 25 years.**
- **The capacity being proposed is greater than what is needed which will lead to unintended consequences to the local community and surrounding counties as waste is sourced from further afield. This has been acknowledged with respect to the WSCC investment in the MBT. Societal changes/ habits and attitudes to food waste has led to an overcapacity issue- this technology at least can be reduced or switched off as needed. An incinerator cannot.**
- **The air quality has not been adequately assessed in the round and key calculations have been challenged by experts based on the approaches set out by govt. It is clear that the professional consultees and the planning officials are reliant on the Environment Agency to manage rather than upfront knowing that there will not be an air quality impact both in the immediate area of North Horsham but also the surrounding area of Sussex and Surrey.**
- **The locals clearly have strong views on the matter and feel this is the wrong waste processing approach, in the wrong site with the impact being felt by too many. They are looking to WSCC councillors to hear their views and to make the right decision for the local community it serves both for today and the next 3 generations who will be impacted by this development.**
- **There is no doubt that the 95m pluming chimney with plumes up to 350 metres at optimum treatment will be perceived by residents/ visitors as industrialisation of this small market town. If the plumes are not effectively managed, this will be more frequent and longer. There is also no data on night time plumes which will be visible by virtue of the site lighting and permanent chimney safety lights.**

Yours faithfully, and thank you for your attention in this matter.

Kirsty McShane, Local Resident of Horsham

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