
From: Helen Clarke
Sent: 01 May 2018 19:00
To: PL Planning Applications
Subject: Application WSCC/015/18/NH

To whom it may concern

Application WSCC/015/18/NH proposed by Britaniacrest Recycling Ltd (BCR)

I object to the proposed development of a 3R/incinerator facility on the following grounds:

Item 1 – Lighting

BCR contend that trees will obscure the view and reduce the detrimental impact of lighting, although the roofline and chimney stack are above the natural tree canopy. Station Road residents and visitors to the Horsham area will see the building, chimney and the lighting. This change will cause a major adverse effect to residential amenity in terms of visual impact and light pollution.

Item 2 – The environment

Incinerators are not sources of "renewable" energy. Incinerators use energy to generate very high temperatures to burn waste, thus converting the waste into hazardous ash, gas and heat. The effectiveness of an incinerator to become a net producer of energy depends entirely upon the type of waste and its calorific value. Incineration plants for industrial waste have routinely proved to be inefficient and can only be made commercially viable by burning recyclable (residential) waste - thus detrimentally reducing recycling.

The European Commission has warned that incineration hampers the move towards a circular waste economy (The Role of Waste-to-Energy in the Circular Economy, 26.01.2017). They recommend investment in more recycling capacity and anaerobic digestion instead. Here in Horsham, we already have a Mechanical & Biological Treatment plant, on the site adjacent to the proposed incinerator, which was part-funded by the taxpayer. As such, we have already invested in the recommended technology here in West Sussex.

DEFRA chief scientific advisor, Ian Boyd, has expressed his personal opinion that incineration extinguishes innovation and is worse than landfill because it destroys value.

Furthermore, developments in technology now present us with alternatives to incineration. As an example, MacRebur are now using recovered plastics as road surfacing, in place of tarmac. This will give us stronger roads, locks in microbeads preventing plastics pollution and is using plastic waste as a genuine resource. Once something is burnt it is gone forever, leaving only polluting particulate matter and toxic waste ash behind.

The only logical conclusion to be drawn is that when waste is incinerated it is no longer part of the circular waste economy that western countries are striving to achieve and it is therefore an outmoded technology and is counter to the drive for cleaner, environmentally sustainable methods of waste handling.

Item 3 – Visual Impact

Should the development go ahead, the visual impact will affect the residential amenity of Station Road residents and this is evidenced in Viewpoint 44 Figure 5.22. The huge industrial building will be clearly visible at all times of the year above the tree canopy. This will include a plume emitting from the 90-95m chimney. As I contended in 2017, the visual effect from Station Road represents a major impact to residents.

I note that photomontage Viewpoint 15, figure 5.23 is from commercial premises now owned by Foss Holdings (The Foss family own and operate Britaniacrest) and assume that they have no issues with their view, which is mainly obscured by trees immediately on the boundary of the property and so does not offer the long-range views that other positions in the road afford. As this land is not

accessible to residents of Station Road or members of the public I would argue that is not a suitable location for a photomontage to be shown.

Item 4 - Character

The proposed building is entirely out of character with the surroundings in terms of the industrial nature of the building. Its size and scale are out of character for this area which is rural in nature with no other visible industrial buildings in the vicinity (all others are below the tree canopy and obscured from view). The proposed huge industrial building, chimney and plume will adversely affect the rural character of the market town of Horsham and the historic Parish of Warnham in contravention of the Waste Local Plan items W12 and Strategic Objective 8.

Item 5 - Location

This industrial development is an entirely inappropriate area close to homes and existing schools and immediately adjacent to the planned North Horsham residential development and schools.

Item 6 – Road safety

Hazardous lime residue would need to be removed from the facility and transported by road to an as yet undisclosed location elsewhere in the UK, which could be as far afield as a storage facility in Cheshire. Transportation of hazardous material by road a) carries potential risk and is b) environmentally unsound when the resultant HGV emissions are also considered.

Given that one of the main road routes to and from the site is the already dangerous A24, which passes through various rural villages and, to the North, the historic market town of Dorking, this method of transporting waste and then hazardous by-product seems detrimental to the health and safety of other road users and fails to seriously consider alternative methods, namely the rail line immediately adjacent to the site. Whilst I appreciate this would be expensive for the operator it must surely be safer and a greener alternative.

Item 7 – Cross County Movements

The facility is not necessarily near the main sources of waste. Waste will cross county borders from Surrey, East Sussex and possibly Hampshire. This contravenes the Waste Plan which states *"in keeping with the principle of net self-sufficiency, no provision is made to meet the needs of adjoining authorities elsewhere in the region or the UK".* and *"...it is not considered appropriate to make the provision for the continued disposal of waste from outside West Sussex"* and *"limited cross border waste movements would need to be justified on their merits".*

As this is an entirely commercial venture for the benefit of the developers profits there can be no such merit for West Sussex or its residents in importing waste into the county. Indeed, because it is a for profit proposal to handle industrial and commercial waste there is no guarantee the developer will opt to prioritise waste from West Sussex if a more profitable income stream is offered from Surrey, for example. This proposed development therefore contravenes the West Sussex Waste Plan.

Item 8 - Noise

In terms of noise pollution, related to loss of amenity, there will be an increase in background noise in a quiet rural setting, especially at night. This will impact my home and those of my neighbours. As an aside, I experienced comments made by the proposers' representative at a meeting (attended by one of your officers) earlier in the year as shocking. He stated that noise was only a problem because it was a quiet rural area. That is precisely why people choose to live here and, in my opinion, this comment serves to demonstrate the lack of regard the developer has for rural West Sussex.

Item 9 – Health

The developer also offers that the health of the area is excellent and above the national average. They state:

"Emergency hospital admissions for a range of cardiovascular and respiratory diseases is also considered to be lower than the national average based on standardised admission ratios for Coronary Heart Disease (CHD) and Chronic Obstructive Pulmonary Disease (COPD) which have been applied to cardiovascular and respiratory diseases respectively."

They go on to imply that the excellent health enjoyed by local residents means that, statistically, we won't be as adversely impacted in terms of health as other areas might by adverse impact from this facility. Surely, we don't want to get any closer to the national average, so any adverse impact is too much?

In addition, various studies have shown a correlation between increased industrialization/urbanization and decreased mental and physical health across populations. Whilst I do not argue that one building makes the difference, evidence shows that the cumulative effect of urban development does impact health. Stressors such as low level but constant industrial noise, air pollution, traffic and night-time artificial light all play their part in this (all factors at play with this proposed development). You need only remember the last time you were in a place without the hum of background noise, under a clear night sky, to know how healthy it is to be in a peaceful, rural environment. We now know that poor mental health has a direct link to a rise in auto-immune disease and cannot hide behind ignorance of these factors. We need to protect rural England, not merely because it is pretty, but because our health depends on it.

Yours faithfully

Helen Clarke
11 Station Road, Warnham RH12 3SR