
From: NORMAN CLARKE
Sent: 01 May 2018 19:22
To: PL Planning Applications
Subject: Planning Application WSCC/015/18/NH - Objection

To whom it may concern,

WSCC/015/18/NH – Britaniacrest (BCR)

As a resident of Station Road, Warnham I wish to submit the following objections to the proposed 3R facility at The Former Wealden Works, Langhurstwood Road, Horsham:

The site is not suitable for the proposed development, being too small and too close to the adjacent railway line to bury the building. Similar facilities throughout the UK are partially buried to mitigate the visual impact but this cannot be achieved at this site. I recognise that the developer has attempted to mitigate this with a small reduction in building height and re-affirm my belief that the reduction is not sufficient. The building is still too high.

The building design and size will have an adverse effect on the visual impact from Station Road (as demonstrated by the new photomontages provided in the 2018 application) and is entirely out of character with the rural surroundings of my home, being a huge industrial building of poor visual design. I recognise that the developer has altered the design since their previous application, based upon what they claim was sufficient public consultation.

However, the public consultation was insufficient in that the developer presented two designs and asked the small number of attendees to choose between the two. This is further compounded because the public exhibition was held at short notice and a second consultation (reasonably requested by members of the Resident's Liaison Committee) was rejected by Britaniacrest.

The current view is of a chimney no greater than 28m high (depending on source of the information). The proposed building is 35.9 high with a 90-95m chimney. The poor building design and size of the proposed development will adversely affect the visual impact from a wide area being clearly visible from various points on Station Road, all major arterial roads in the area (Views of the current chimney are visible from A24 from the North, West and South and A264 from East and South).

The proposed development is also adjacent to the Victoria to Horsham railway line, being a major entry route for travellers to the rural market town of Horsham and the historic village of Warnham and the industrial nature of the design will adversely affect the image of the area as visitors arrive by train.

The source of waste is (at this stage) reportedly mainly commercial and industrial from various counties, which represents a significant extension to the West Sussex Waste Plan which outlines how waste from West Sussex will be handled and is therefore outside the scope of the plan.

Although the site lies immediately adjacent to the railway line this sustainable method of transport has been dismissed by the developer as a delivery method. Strategic Objective 7 refers: "to maximise the use of rail and water transport for the movement of waste to minimise lorry movements and the use of local roads for the movement of waste. Policy W18 states "Proposals for waste development will be permitted provided that: (a) where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site"

The Waste Plan outlines that WSCC aim to protect and where possible, enhance the health and amenity of residents, businesses and visitors. There is no guarantee of this given that:

- Diesel emissions will increase in the area as the operation increases transport of waste
- Waste will be imported by HGV from sources at a time that the UK is attempting to reduce the use of diesel vehicles to prevent impacts on health due to carbon dioxide and NOx emissions
- Hazardous by product will need to be transported from the site by road to an as yet undisclosed address, which could be in Cheshire
- Emissions (pollutant, heavy metals and carcinogenic dioxins) will be produced into the atmosphere. Even though they would be at the currently accepted and legal levels, there is no guarantee that harm is not caused by minute particulate matter to the health of local people, wildlife or domestic/agricultural animals within the locality. Based on current scientific evidence asthma is caused by pollution, no matter how low the level. Asthma still kills 3 people on average per day in the UK and the NHS spends around 1 billion a year treating and caring for people with asthma (<https://www.asthma.org.uk/about/media/facts-and-statistics/> accessed 24/04/2018).

In the case of plant failure (such as those experienced during the first week of operation at the Dublin 3R facility in 2017) harmful emission levels could potentially increase immediately with extremely harmful short and long-term repercussions. There can be no 100% guarantee of safety with regard to public health in relation to any form of incineration process.

Whilst I argue that the proposal is entirely out of keeping with a rural area, it is even less compatible with the plans for the adjacent residential North Horsham development and accompanying schools.

The BCR proposal will cause significant loss of amenity for existing residents in terms of noise pollution, contributing an increase on existing noise levels causing a cumulative effect of noise pollution. This most definitely will impact my home, which was the receptor point for the developer's noise tests, and the homes of my neighbours. Indeed the developer's own architect admitted at a Resident's Liaison Committee Meeting that the noise and light levels will be noticeable at night.

This proposal will cause significant loss of amenity for existing residents in terms of light pollution. The developer has proposed a 24 operation which will require that the site be lit causing a significant increase in light levels experienced at homes on Station Road, which is a predominantly dark country lane. This has a cumulative effect taking into consideration existing lighting from Warnham Station and the Wienerberger Brickworks to the east and north east of properties. Currently the existing street lighting (a single lamp) is extinguished at midnight (BST) which protects and reflects the rural nature of the lane and prevents night-time light pollution.

The developer has suggested that this process will provide electricity. The incinerator is highly unlikely to fulfil its potential in terms of energy recovery. Figures supplied by OFGEM show that actual supply of electricity from similar technology in use in the UK falls far below the theoretical capacity in that **zero** CHP Energy from Waste stations and **zero** waste using advanced conversion technology actually provide energy in the UK at present. (<https://www.variablepitch.co.uk/categories/> accessed 24/04/2018)

The developer claims that views of the facility will have little impact to the residents of Station Road. There are direct views from the entrance to Andrews Farm Barns, Station Road and from some homes at Station Cottages. The current chimney is approximately 26.5mtr - 28 mtrs (depending on source) high and is roughly level with the skyline from various viewpoints. The proposed building is considerably higher than the existing chimney, above the tree canopy, with a proposed chimney height of 90-95mtr. It will create a completely new skyline and have considerable visual impact not only for local residents, but other users of Station Road (including the commuters who use Warnham Station) and indeed users of the A24 and A264.

I further object because the building size and design is entirely out of keeping with the character of Warnham and Horsham.

I object because the building size is entirely out of keeping with the character of Rural West Sussex.

I object because the site is too small to put in place mitigating factors that would reduce the impact such a huge industrial building will have in this landscape.

I further believe that this facility will add to the cumulative effect of traffic on the local road system which is already at full capacity during rush hour. Current transport moves to and from the site are much lower than permission allows but still the A24 and A264 struggle to cope. Road infrastructure and safety is a pressing issue that has not been sufficiently addressed by the developer's proposals.

In closing I will also add that over the last 12 months many factors have changed, not least in the Blue Planet Effect, which has seen a sudden and remarkable change to our environmental consciousness. Within a very short time we have seen a significant reduction in the use of plastics. Emerging technologies are now using plastics to enhance and promote the circular waste economy, which incineration does not. 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. We have already invested in the recommended technology and if further such facilities are recommended then let us consider those, in areas close to the waste generated (thus minimising transport associated pollution). Let us dismiss the consideration of outdated technology which injures our attempts to live in an environmentally sustainable way and will undoubtedly prove to be a white elephant of epic proportions in our county.

Yours faithfully
Norman Clarke
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