
From: Victoria Burrows
Sent: 01 May 2018 16:40
To: PL Planning Applications
Cc: Noel Atkins; Andrew Barrett-Miles; George Barton; Ian Buckland; Duncan Crow; Janet Duncton; Liz Kitchen; Nigel Jupp; Simon Oakley; Ashvin Patel; Brian Quinn; Jacquie Russell; Sujan Wickremaratchi; Bill Acraman; David Barling; Joy Dennis; Paul High; Michael Jones; Sean McDonald; Morwen Millson; Christian Mitchell; Louise Goldsmith
Subject: Proposed Incinerator - Objection

Dear Sir or Madam

Re: Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I write in response to the proposals for an incinerator in Horsham, West Sussex. The proposals do not meet WSCC waste plan:

a) Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county. It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

b) Strategic Objective 10: To protect and, where possible, enhance the natural and historic environment and resources of the County. There is no element of the proposals that will enhance the natural environment.

c) Policy W11: Character. Proposals for waste development will be permitted provided that they would not have an unacceptable impact on:

(a) the character, distinctiveness, and sense of place of the different areas of the County.....

Yet the proposal will have a dramatic effect on the character of Warnham and Horsham and so I do not believe it meets the criteria.

(d) Policy W12: High Quality Developments. Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) take into account the need to:

(a) integrate with and, where possible, enhance adjoining land-uses.....

(b) have regard to the local context including:

(iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area;

(iv) views into and out of the site.

The proposed incinerator clearly does not meet this requirement.

Visual Impact

The proposed incinerator building will be taller than this chimney some 35.92m in height. The building will be bigger than Horsham's shopping centre, Swan Walk, and taller than the brickworks chimney, 26.5m. It will be

seen from far and wide, including areas of outstanding natural beauty. The proposers themselves acknowledge that it will be seen as far as Box Hill.

Light Pollution

For the CAA to demand middle and top of the stack is lit at night is due to flight paths. The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site.

The stack will therefore be lit up producing a significant increase in light pollution from the plant and the skyline.

Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

It is Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn. Another negative impact on the town.

Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Operations

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

It will not linked to the national grid

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposed incinerator. I therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Compensation

There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation being offered to those whose home will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

UK Cross Party Political oppose incineration

UK Win are behind the political cross party Early Day Motion (581)* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK. Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

The European Commission (EC) calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing out support for mixed waste incineration. (29 January 2018)

The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs. The

EfW process must be redefined to ensure that increases in recycling and reuse are not hampered, and that over-capacities for residual waste treatment are not created.

Long-term circular economy perspective. The EC's communication reads: 'In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy. 'Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators. For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.'

In the circumstances and for the reasons set out above I write to register my objection to the proposals for an incinerator at the above site.

I look forward to hearing from you.

Yours faithfully

Victoria Burrows