

From: [Sheila White](#)
To: [PL Planning Applications](#)
Subject: Objection to Planning Application Number WSCC/015/18/NH
Date: 21 April 2018 13:42:24

Dear Sirs

I want to place on record my strong objections to this planning application.

Britaniacrest's proposals for this site are totally inappropriate. The site is not big enough for the proposed facilities and so they want to build the structures upwards, as opposed to outwards, resulting in a huge block-house of a building which will dominate and blight the countryside for miles around. The necessary chimneystack to deal with emissions from the incinerator will be even taller, the zone of theoretical visibility extending to 15k from the site. This is totally unacceptable for an area which includes Areas of Outstanding Natural Beauty, National Parks and Gardens and many national heritage assets.

This application does not comply with WSCC's own Waste Local Plan as follows:

Strategic Objective 5: *"To make provision for new transfer, recycling and treatment facilities as close as possible to where the waste arises."*

The applicant wants to import commercial and industrial waste from outside the Horsham and West Sussex area. This will result in more HGVs coming from all over the southern counties (and quite possibly beyond) resulting in extra traffic congestion and pollution.

Strategic Objective 7: *"To maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste"*.
(see also Policy W18)

The applicant will be relying on using lorries to move waste to and from the site. They propose accessing the site by means of the A264 and the A24. Both these roads are already subject to congestion, particularly at busy times of the day. In particular, the A24 is a narrow, twisting, single-carriageway road where it runs from the Great Daux roundabout to Capel in Surrey. That stretch of road is little better than a country lane. Local people are aware that there have been many accidents (some fatal) on this stretch of the A24 and speed restrictions and warning signs "Caution Narrow Road" have had to be put in place by the Highways Authority.

Strategic Objectives 8 and 9: *"To protect and, where possible, enhance the special landscape and townscape character of West Sussex" and "To protect the SDNP and AONBs from unnecessary and inappropriate development"* **(see also also Policies W11 and W12)**

This application does nothing to comply with these objectives and policies. Despite trying to "downsize" the main incinerator building and cosmetically change its appearance in this second attempt at gaining planning approval for this monstrosity, the bulk of the main incinerator building, together with the 96m high chimneystack to cope with its emissions, would overpower the local landscape. The site is in a rural location surrounded by fields and woodland, totally unsuited to a huge industrial structure such as this. It would have a major adverse impact on Horsham and the surrounding villages, with its adverse effects reaching as

far as Areas of Outstanding Natural Beauty in both Sussex and Surrey.

Strategic Objective 10: *“To protect and, where possible, enhance the natural and historic environment and resources of the County”*. (see also Policies **W11, W12, W14 and W15**)

Clearly this application contravenes this strategic objective and the policies stemming from it. This enormous, ugly incinerator with its accompanying stack, visible for 15km (and more when emission plumes are visible) would blight the immediate and surrounding areas, including the nearby Areas of Outstanding Natural Beauty and designated parks and gardens. Within 1.5km of the site is the historic village of Warnham with its Conservation Area. In close proximity to the site there are many national heritage assets (including important scheduled monuments and 36 listed buildings). Just on the other side of the A264 is the Warnham Nature Reserve. This 92 acre site was designated a Local Nature Reserve in 1988. It includes a 17 acre millpond, marshes, grassland, reed beds, hedges and woodlands. The site provides a haven for a variety of wildlife including over 100 species of bird. The inevitable 24/7 noise and night-time light pollution from the incinerator would certainly disturb the wildlife on the nature reserve in contravention of Policy W14.

Strategic Objective 13: *“To protect and, where possible, enhance the health and amenity of residents, businesses, and visitors”*. (see also Policy **W19**)

Again, this application is non-compliant. The industrial incinerator would do absolutely nothing to enhance the health and amenity of residents, businesses and visitors! The results of ongoing research into the possible harmful effects of emissions from incinerators are still awaited. Public Health England’s study results have been delayed several times already. Certainly no decision on this application should be taken until the results of this research are made public and can inform the decision-making process on this application.

Horsham District Council recently approved plans for a huge new housing development next to the proposal site (Planning Application DC/16/1677). There will be 2,750 new homes and three new schools on the development. The plans for this housing development show a primary school abutting the applicant’s site. The prevailing airflow means emissions from the stack will flow directly over the school and the new houses. West Sussex County Council have a duty of care to ensure the health and amenity of the residents of this new development are not endangered by allowing an industrial incinerator to be built nearby.

Traffic – Traffic in this area has increased steadily over recent years. 2,000 new homes on the “West of Horsham” developments, the large housing development at Kilnwood Vale on the A264 towards Crawley and various other smaller development in the area have meant added congestion in and around Horsham town and hold-ups on the roads leading to it (including, of course, the A264 and A24). The new development on Land North of Horsham will add even more traffic congestion and pollution. At the Government Inspector’s Hearings in connection with the Horsham District Planning Framework and Land North of Horsham development, he intervened to request modifications to the HDPF to try to alleviate the problems on the A24. This followed representations from Mole Valley District and Surrey County Councils who had concerns about the impact extra traffic was going to have on their areas. One of the mitigation measures was to have traffic light controls on the Great Daux roundabout. This will lead to HGVs pumping out polluting diesel exhaust fumes as they sit waiting for the lights to change on

their journeys to and from the incinerator site. With up to 284 (and rising?) HGV movements per day to feed the monster, it will be a very unpleasant experience living in this locality.

Light and Noise Pollution - Aviation lighting will be necessary on both the massive structure housing the incinerator and also the stack, so there will also be an adverse effect on the local area from light pollution at night.

In addition, there is the matter of noise which, it is understood, can have a harmful effect on people, particularly if it affects their sleeping pattern. It is acknowledged that an increase of anything over 5dB indicates an adverse impact on people. The applicant acknowledges that at night, in the operational stage, there would be an increase in background noise levels for local residents of 6dB. This is unacceptable.

Policy W21: “Cumulative Impact. Proposals for waste development, including the intensification of use, will be permitted *provided that an unreasonable level of disturbance to the environment and/or local communities will not result....”*

Clearly the application does not comply with this policy. There are so many adverse impacts stemming from this proposal, it is difficult to enumerate them all. Suffice it to say that the cumulative adverse impact on local communities (and even on those further afield) should dictate that this application is refused in its entirety.

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