

**From:** [Sheila White](#)  
**To:** [PL Planning Applications](#)  
**Subject:** FW: Planning Application WSCC/015/18/NH - Objection  
**Date:** 27 April 2018 14:21:47

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I am resending the following e-mail because my objection to this application does not appear on the portal, although it was sent on 21<sup>st</sup> April. My husband (William Harwood White) sent in his own objection at about the same time and I can see it has been recorded. Somehow my objection seems to have been missed. I would like it to be recorded as per the following e-mail. Thank you.

Sheila White

Sent from [Mail](#) for Windows 10

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**From:** [Sheila White](#)  
**Sent:** 21 April 2018 13:14  
**To:** [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)  
**Subject:** Planning Application WSCC/015/18/NH

I strongly object to this application for the following reasons:

Although West Sussex County Council's Waste Local Plan 2014 identifies a need for further transfer, recycling and treatment facilities for waste in the county, this application is not compliant with HM Government's National Planning Policy Framework 2012, nor the Horsham District Planning Framework 2015. Indeed it also contravenes WSCC's own Waste Local Plan 2014 in several particulars:

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

Obviously, this objective would not be met, because the applicant seeks to import mostly commercial and industrial (but some domestic waste too) – not just from West Sussex, but from other counties as well. They will need to import waste from further afield for financial reasons and just to keep the monster fed.

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*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". (cf. also Policy W18)*

Clearly this objective would not be met because the applicant's plan for bringing in the waste relies on the use of lorries on local roads. Their submission clearly indicates only two HGV routes to the site. One would be along the A264 from the direction of Crawley and the M23 and, crucially, the other would use the A24 from the direction of

Dorking and the London area. Although the A24 is a primary route between the South Coast and Central London, the section between Great Daux roundabout (close to the proposal site) up to Capel in Surrey is a notoriously hazardous, narrow, single carriageway with many dangerous bends. WSCC Highways Authority has been obliged to reduce the speed limit and erect warning signs along this stretch of road. It is totally unsuitable for use as one of only two routes to the site. Even the Government Planning Inspector drew attention to this problem stretch of road when conducting his enquiries about the "North of Horsham" major housing development that is due to be built next to this application's site.

Strategic Objective 8: *"To protect and, where possible, enhance the special landscape and townscape character of West Sussex". (cf. also Policy W11)*

Since withdrawing their previous application for this site (due to the overwhelming opposition to their original plan) the applicants have tried to reduce the impact of their planned facility by reducing the size of the building to house the incinerator. However, the bulk of this enormous building (approximately 12 storeys high and approximately 140m long) would still be 1.36 times taller than the existing brickworks chimney stack. Even at this reduced size, the main building, together with the 96m high flue stack to cope with its emissions, would overpower the local landscape and thus contravene this objective.

Strategic Objective 10: *"To protect and, where possible, enhance the natural and historic environment and resources of the County". (cf. 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. Much closer to the proposal site (within 1.5km) are the Warnham Conservation Area and several national heritage assets (including scheduled monuments and 36 listed buildings). A near neighbour of the site is the Warnham Nature Reserve. The inevitable 24/7 noise and night-time light pollution 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". (cf. also Policy W19)*

Again, this application is non-compliant. The results of Public Health England's study into the possible harmful effects of emissions from incinerators are still not available. Indeed, informed opinion is moving towards the idea that there are already too many mass-burn incinerators in the country and moves are afoot to bring in a moratorium on building new ones. We do not yet know what harmful effects complex chemical combinations can have on people's health. The site's proximity to Gatwick and the

hazards of a mix of aviation fumes and pollutants and particulates from the incinerator's flue are unknown.

Horsham District Council has granted planning permission for 2,750 new homes, a secondary school, primary school, early years school, a special educational needs school, a business centre, a sports hub and sports pitches, various recreation areas and allotments to be built on the "North of Horsham" development site which lies adjacent this application site. It is incumbent on West Sussex County Council, which has a duty of care, to safeguard the health and amenity of these new residents, as well as those already living in the area. The prevailing airflow from the proposal site will mean any harmful emissions from the stack would drift over this neighbouring development.

In addition there will certainly be added pollution from HGVs (up to 284 two-way movements **per day**) travelling to and from the site, which must be taken into consideration. This would apply, not only to the local area, but further afield as lorries will be bringing waste from other counties. Toxic and hazardous residues would then have to be trucked away from the site to where they could be treated appropriately.

Aviation lighting will be necessary on this massive structure and 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. Scrolling through the documents accompanying this application I was struck by how many times the phrase "Minor adverse effect" (as well as "Moderate adverse effect") was used in the applicant's analyses of outcomes. In my view, the cumulative impact of all these "adverse effects" leads to a **major adverse impact** on the local community and environment.

For all the above reasons and because the scale of the development is out of all proportion to its location and rural environment, I urge West Sussex County Council to refuse this application in its entirety.

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