

KEITH TAYLOR
Green Party
for the South East of England



26 April 2018

County Planning,
West Sussex County Council,
County Hall,
Chichester
PO19 1RH

Dear Planning Office,
Dear West Sussex County Council,

Re: Horsham Incinerator (WSSCC/015/18/NH)

I am writing to you to object to the incinerator planned for Horsham.

The community in Horsham fought an incinerator in the early 2000s, another application last year and is facing the same fight again today. It was as a direct result of the campaign against the incinerator plan in the early 2000s which saw investment in a Mechanical & Biological Treatment facility at the Brookhurst Wood site. That facility provided West Sussex with an additional waste processing capacity of 310,000 tonnes per annum.

Like many of my constituents, I am concerned that this latest proposal is for a commercial incinerator with a huge capacity – 180,000 tonnes per annum. There is no guarantee that locally produced waste would be processed and an understanding that industrial waste materials could be processed from across the southern counties.

The size of the plant as much as its capacity are a point of concern. Industrial buildings will tower above the treeline and rural site, while the character of the Horsham and Warnham areas will be harmed. I would also like to take this opportunity to remind the local planning authority that the application site lies within 5km of a nearby Area of Outstanding Natural Beauty. It is no accident that Members of the Friends of Warnham Local Nature Reserve have expressed concerns, which I share, about the environmental effects of discharges from the proposed incinerator on the Nature Reserve and its 400 species of plants, 100 species of bird and 21 species of dragonfly.¹

While an understanding has been provided in the proposals of the incinerator's impact on local wildlife, including existing wild and protected species' use of the site, what is less clear is the impact of emissions on habitats and biodiversity. I am deeply concerned about the harmful emissions from the incineration processes on site and worry that assessment of the emissions have been carried out miles away from the site, not on the site. Heavy metals, acidic gases and poisons will be emitted in an area with high populations, with a nursery (Little Barn Owls) and primary school (Holbrook) in the locality. Although the flooding assessment states that flooding incidents on site are non-existent, I am not alone in expressing concerns about toxic waste leaching into the soil and its potential impacts on freshwater sources such as the Ardingly, Wierwood and Bewl Water reservoirs. The potentially devastating impact on local farmland and livestock doesn't seem to have been properly assessed either.

As such, the proposal stands in direct contradiction to the stated aims of the West Sussex Waste and Minerals Plan which stipulates that the health of residents will be protected.

Liberty, developers behind the North Horsham Development (over 2,000 houses and schools), this week also took the view in their objection that the planned incinerator would have adverse effects

¹ <http://www.warnhamnaturereservefriends.org.uk/>

on visual amenity and raised concerns about its noise pollution impacts. Liberty has also claimed that mitigating measures such as the planting of trees will take at least 15 years to fully establish, too long a time to provide adequate reduction in the severe impact local residents will experience.

If the incinerator is given the go-ahead, attention will be diverted from waste reduction, recycling, reuse, anaerobic digestion, composting and other more creative solutions which could lead us toward a “zero waste” outcome by 2050, if not sooner. The focus on incineration will kill off those good intentions. Moreover, there is overcapacity in incineration in the South East and already there is not enough waste to feed the incinerators currently planned and in use in the UK.

Just last week, Members of the European Parliament voted on the EU's Circular Economy Package to take another step towards a truly sustainable European economy. Estimates suggest that the circular economy could boost the European economy by as much as €1.8 trillion by 2030. It also has the potential to unlock huge job creation. It is estimated that for every 10,000 tons of waste, 36 jobs can be created if it is recycled, and up to 296 if it is reused - compared to one job in case of incineration or six jobs in case of landfill.² It is hugely disappointing, therefore, that rather than embracing the circular economy and its job creating potential, West Sussex is proposing to take a huge step backwards by embracing waste incineration.

I back the aims of the cross-party Early Day Motion to place a moratorium on new incinerators, co-tabled by my Green colleague Caroline Lucas MP in the House of Commons. Amongst others, progressive MPs across the political spectrum acknowledge that in the UK there is now more waste incineration capacity built and under construction than it is forecast there will be genuinely residual combustible waste to burn. Furthermore, they acknowledge the need to send a clear message that the waste hierarchy should shift focus away from incineration and towards waste reduction, reuse, recycling and composting; and calls on the Government and the devolved governments to introduce a complete moratorium on new waste incineration capacity.³

Where the most sustainable waste management approaches can't meet demand yet, increasing landfill capacity would be preferable to this medium/long term commitment to incineration and would be more consistent with the Waste Hierarchy in the Waste Framework Directive (2008/98/EC)⁴ than what is currently being proposed. This is manageable and reversible in a way that establishing an incineration programme is not.

Notwithstanding my opposition to any increase in incineration, I would like to point out that even if this incinerator is approved, there is still no guarantee that local authorities would actually use the Britaniacrest incinerator. If planning is permitted the owners of this commercial incinerator would have to negotiate waste tonnage prices with anyone wanting them to burn their waste so WSCC may opt to transport waste out of the county, as it currently does.

In conclusion, I urge you to reject this planning application and instead increase recycling targets and prioritise strategies to improve capacity for recycling and waste reduction.

Yours sincerely,



Keith Taylor, Green MEP, South East England.

² <https://www.greens-efa.eu/files/doc/docs/6706d1f76fbd7dafb124f5f9ce88d7dc.pdf>

³ <https://www.parliament.uk/edm/2017-19/581>

⁴ <http://ec.europa.eu/environment/waste/framework/>