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**From:** Emma Rees [REDACTED]  
**Sent:** 03 May 2018 22:53  
**To:** PL Planning Applications  
**Cc:** david.sheldon@westsussex.gov.uk; Nigel Dennis; Morwen Millson;  
elizabeth.kitchen@westsussex.gov.uk; Louise Goldsmith  
**Subject:** Application for planning permission Incinerator, North Horsham:  
WSCC/015/18/NH

To whom it may concern.

I wish to lodge an objection to the planning application **WSCC/015/18/NH**.

Please note that I have tried to do this online but keep getting a server error message.

I am a Horsham resident and council tax payer, address below.

Please see the text below for details of the objections.

Yours sincerely,

Emma Rees  
Fig House  
Werst Parade  
Horsham  
RH12 2BZ

### **Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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

The scale of this plant seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 protect or enhance the natural environment.

**Strategic Objective 11:** To protect and, where possible, enhance the natural and historic environment and resources of the County.

There is nothing to suggest that this will enhance the local area in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question the pollution from the emissions including lead, mercury, dioxins, the increase in road

traffic and the impact it will have on business travel in delays and detrimental impact on Horsham as a whole.

**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.....

It is questionable if this policy will be met by this proposal, as it will be seen from rural villages and detrimental impact on Horsham and surrounding rural communities.

**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 Britaniacrest proposal does not meet the criteria set out above.

**Policy W19: Public Health and Amenity.** Proposals for waste development will be permitted provided that: lighting, noise, dust, odours and other emissions ... are controlled to the extent that there will not be an unacceptable impact on public health and amenity.

The proposals will require aviation lighting as well as have a night-time noise impact on the neighbouring communities creating light pollution for the area.

### **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 mapping of routes included by the proposers does not include the departure route that flies over North Horsham. Flight paths are not lines on the ground but in fact have an impact some 3-5nm either side of the line. The mapping does not show arrivals.

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

### **Recycling**

WSCC have shown a 2% increase in recycling. Burning waste may hold the council in long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London. Government is already beginning to consider compelling evidence that there is overcapacity of waste incineration in the UK. The experience of the EU is that they have to import waste in order to feed their incinerators and there is a correlation between increased incineration and decreased recycling.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## **Noise Pollution**

As the site will operate 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB.

Ambient noise levels decrease at night and Britaniacrest have admitted that they are struggling to reduce the noise to a level compatible with a rural location.

## **Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally over powering and intrusive day and night as it sits above the natural tree height canopy.

The intrusion of the stack will be particularly intimidating at times when exhaust plumes are being emitted. The application documents state that the plume height could range from 6m to over 400m from the top of the 96m chimney.

## **Noise intrusion**

At the operational stage it is acknowledge in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

## **The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

Furthermore, incineration plants in the EU are already being decommissioned because reduced availability of suitable waste has significantly reduced the amount of material available to fuel the burners.

Many countries are now having to import material to incinerate.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK.