

From: [Andy Rankin](#)
To: [PL Planning Applications](#)
Subject: Horsham Incinerator OBJECTION.
Date: 03 May 2018 08:20:38

**Subject: OBJECTION Reference WSCC/015/18/NH
BritaniaCrest Warnham Brickworks Incinerator**

Please register my OBJECTION to this application

General principles

Britaniacrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to take industrial waste materials from across southern counties of England.

WSCC taxpayers paid for the biomechanical digester on this site only a few years ago. Visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. The proposer has stated that they intend to burn black sack waste as well as industrial. This is an unacceptable waste of WSCC and West Sussex taxpayers money.

The site is too small and unsuitable. Due to lack of land Britaniacrest propose to build double height with a flue stack chimney that is some 96m tall and far higher than the existing brickworks chimney, which itself is a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

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

This application is contrary to the West Sussex County Council's Waste Local Plan

Absence of need The UK already has surplus capacity for

burning waste. Government ministers are starting to push for a moratorium on incineration facilities.

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.

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.

All these factors together will lead to a reduction in recycling, when WSCC have achieved a 2% increase in recycling over recent years. Burning waste has a very real prospect of holding the council into long term contracts in order to keep this waste hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London. The 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.

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 exceeds the needs of West Sussex. It seeks waste from outside the local area and thus will encourage commercial waste being transferred over long distances.

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. This is sited in an area that has and is continuing to see mass over development of land, both pre-existing sites and on green belt land. (Liberty

Property Trust North Horsham, Kilnwood Vale and the Britaniacrest site) Not to mention on going developments in and around Southwater.

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. It will detract and blight the natural and historic environment being visible from 15kms away in areas of Area of Outstanding Natural Beauty. In addition I believe 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. This is sited in an area that has and is continuing to see mass over development of land, both pre-existing sites and on green belt land. (Liberty Property Trust North Horsham, Kilnwood Vale and the Britaniacrest site) Not to mention on going developments in and around Southwater. The Horsham area is experiencing huge over development with little or plans for alleviation of the traffic issues that will be caused by the extra traffic travelling to and from this site and all the other surrounding (recently approved) developments.

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 have a 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.

The proposed development is unsuitable for the site:

Light Pollution - The stack will be lit due to its close proximity to Gatwick Airport and will produce a significant increase in light pollution from the plant. Notwithstanding the visual impact on the surrounding area of a huge 95m brightly lit offensive looking chimney.

Flight paths: Flight paths are not represented fully or accurately in the proposal. For the CAA to demand that 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.

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

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. It is 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.

Regards,

Andrew Rankin

Sent from my iPhone