

From: [Clive Phillips](#)
To: [PL Planning Applications](#)
Cc: david.sheldon@westsussex.gov.uk; [Nigel Dennis](#); [Morwen Millson](#); elizabeth.kitchen@westsussex.gov.uk; [Louise Goldsmith](#)
Subject: Reference WSCC/015/18/NH - objection
Date: 23 April 2018 11:13:17

Dear Sirs/Mesdames,

I am writing to lodge an objection to the proposed Britaniacrest incinerator at North **Horsham**, near the Brickworks off the A264 close to Great Daux Roundabout.

Grounds for the objection:

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

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

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 the import of waste from outside the local area and thus will encourage commercial waste being transferred over long distances 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 it, being visible from 15km away in areas of Area of Outstanding Natural Beauty. I question the pollution from the emissions including lead, mercury and dioxins, the increase in road traffic, the impact it will have on business travel in delays and the 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.....

This aspect of policy will not be met by the proposal, as the incinerator chimney stack will be seen from 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 and will exert a night-time noise impact on neighbouring communities, creating light pollution for the area.

Light Pollution

The CAA is requiring the middle and top of the stack to be lit at night. The CAA would not be demanding such comprehensive lighting if flight paths 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 lit like a Christmas tree producing significant increase in light pollution from the plant and on the skyline.

Recycling

WSCC have shown a 2% increase in recycling. Burning waste may tie the council into 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 residential black sack waste as well as industrial waste. 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 experienced 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 surrounding countryside, being totally overpowering and intrusive day and night as it protrudes and projects above the tree 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 acknowledged 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 EU countries 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. If the proposal is granted planning consent, West Sussex be left with a harmful white elephant.

Best regards,

Clive Phillips MA(Oxon)

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