

**From:** [T Peters](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Application Number: WSCC/015/18/NH - Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure - Objection.  
**Date:** 30 March 2018 17:48:03

---

Dear Sirs

I wish to register my objection to the granting of planning permission for application Number: WSCC/015/18/NH, described as a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure.

My objection is based upon the following:

**Suitability of use for the area:**

- Proximity to residential areas of large population and the proposed North Horsham development. A slight shift in the prevailing wind direction will move the exhaust plume over these areas. This may be an acceptable downside if the waste being burnt was produced by local residents but this is mainly a facility for the processing of commercial and industrial waste.
- The negative visual impact of a large plant in a rural site and which will also be clearly seen from Warnham and neighbouring residential areas
- The site is close to the Warnham SSSI which is described as “one of the most important sites in this unit”. As the local prevailing wind is south-westerly the ash deposits from the incinerator plume would likely fall on to this area providing contamination of the site. It is also conceivable that during north-easterly winds the plume will drift contaminants over the Warnham Nature Reserve.
- Incinerators undermine councils' recycling schemes by demanding long term waste delivery. This goes against your own policy as stated in the WSCC Waste and Recycling Service Plan 2017/2018 where you target yourselves to increase recycling rates. You cannot recycle something you have burnt.

**Layout/appearance/design of buildings:**

- The proposal includes a 95m, permanently-lit chimney stack with red marker lights which are permanently lit to warn aircraft of the structure. To put the height of the stack in context it is 2m higher than the Statue of Liberty and only 1m shorter than the Elizabeth Tower (home to Big Ben) at the Palace of Westminster. This cannot be acceptable in a rural area famed for its rolling hills and down-land fields.
- The main boiler building is proposed to be just under 36m tall. That is 10m taller than Buckingham Palace.

**Loss of light/outlook/privacy:**

- Given the above dimensions the outlook of the buildings and chimney will overlook nearby homes and businesses.
- Additionally the 95m chimney will be visible from most of North Horsham, Warnham and Faygate.

**Traffic generation/access/highway safety:**

The proposal is clearly designed to provide a facility to maximise a revenue stream for Britaniacrest Recycling Ltd. This will likely require the importation of commercial waste from other areas in order to “feed” the facility.

- Increased traffic moving waste and ash to and from the incinerator will be a big headache for local residents, with many additional Heavy Goods Vehicles having to use the narrow A24 and Langhurst Wood Road each day. It is reported that an average sized plant handling 200,000 tonnes of rubbish per annum will mean 13,000 lorry loads a year. ( I note the application proposes 230,000 tonnes per annum)
- These Heavy Goods Vehicles will produce significant amounts of CO<sub>2</sub> and NO<sub>x</sub> as they will invariably be diesel powered. The Council should be aware already from the recent studies of air quality in London of the impact of diesel emissions on public health.
- Road safety: The local roads are highly popular with walkers, cyclists and horse riders. Additional HGV vehicle volume will increase the risk of conflict between large HGV vehicles and vulnerable road user groups. This in turn will inevitably lead to 1) increased risk of death or serious injury to vulnerable road users 2) the likely need for the Council to have to put in place additional infrastructure to support these users or to allow access to the site for additional large vehicles (e.g. access roads, cycle paths or at the very least additional signage/traffic control measures) which will be a further unnecessary drain on resources.

#### **Impact on natural environment including animals and their habitat:**

*The Waste Strategy 2000 for England and Wales* - In response to the demands of the Landfill Directive, and other European directives on waste, the Government produced a National Waste Strategy in May 2000 which set out its views on the future for waste management in England and Wales. The Strategy requires that decisions on the type of waste management technique to use, including decisions on suitable sites for treatment and disposal, should be based on a local assessment of the Best Practicable Environmental Option (BPEO). This requires managers to take decisions which minimise damage to the environment as a whole, at an acceptable cost in the long and short term. It is based on three key considerations:

1) " the waste hierarchy places reduction as the most preferable option for managing waste. This is followed by re-use, then recovery through recycling, composting and energy recovery, and lastly disposal. It is important to note that the strategy states that **“incineration with energy recovery should not be considered before the opportunities for recycling and composting have been explored.”**

2) " the proximity principle requires waste to be disposed of as close to the place of production as possible. This avoids passing the environmental costs of waste management to communities which are not responsible for its generation. It also reduces the environmental costs of transporting waste.

3) " Self-sufficiency: waste should not be exported from the UK for disposal, and waste planning authorities and the waste management industry should aim, wherever practicable, for regional self-sufficiency in managing waste.

#### **Dust/odour/fumes:**

A UK report entitled “The Health Effects of Waste Incinerators” by the British Society for Ecological Medicine was conducted in 2005 and then updated in 2008.

[http://www.bsem.org.uk/uploads/IncineratorReport\\_v3.pdf](http://www.bsem.org.uk/uploads/IncineratorReport_v3.pdf).

- This report states “... fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality (see section 3.1) and demonstrating that the danger is greater than previously realised. More data has also been released on the dangers to health of ultrafine particulates and about the risks of other pollutants released from incinerators (see section 3.4).
- With each publication, the hazards of incineration are becoming more obvious and more difficult to ignore” They go on to state that” ...Large studies have shown higher rates of adult and childhood cancer and birth defects around municipal waste incinerators: the results are consistent with the associations being causal. Several smaller epidemiological studies support this interpretation and suggest that the range of illnesses produced by incinerators may be much wider”
- The emissions from an incineration plant in comparison to a coal plant are significantly more harmful to the environment, the harmful effects of coal fired power stations have been fundamental reason for their decline; why would the Environment Agency promote the use of a dirty technology that releases:
  - 6 times more Lead. A well-known toxin that diminishes intelligence and – by lowering dopamine levels in the brain – may even be tied to increases in violent behaviour and cocaine addiction
  - 3 times more Nitrogen Oxide. A gas that primarily contributes to eye, nose, throat and lung irritation and respiratory problems like shortness of breath that can trigger asthma.
  - 2 times more Carbon Monoxide. A contributor to the formation of ground-level ozone pollution, aggravating asthma.
  - 70% more Sulphur Dioxide. A cause of acid rain – is also bad for lungs, with even short exposures to ambient levels causing “bronchial constriction and increased asthma symptoms.

#### **Noise/disturbance:**

- The construction phase of the facility will see construction of buildings, roads completion, drainage and infrastructural works completion. Subject to lead times for plant delivery, the duration of Phase 2 is estimated at approximately 23 months.” This will be nearly two years of significant noise, dust and additional construction vehicle traffic in the local area.
- Additional Heavy Goods Vehicle traffic volumes to provide fuel for the facility will create additional road noise and congestion on the small feeder roads and on the A24 and A264. The average HGV when passing at approximately 7 meters is 95-100db. That is the same as a hand-drill or slightly less than that maximum permitted for a discotheque/nightclub. There will be a significant number of residents in the affected area with homes that will be within 7m of a passing HGV traffic. There will be more once the proposed North Horsham development begins.
- The proposal states that the facility will operate 24 hours a day and 7 days a week except when maintenance is required.

#### **Effect on landscape or character of area;**

The Council will know full well that Horsham is a traditional market town well situated on the edge of the Sussex Weald. We are fortunate to be an area of significant beauty next to the major conurbation of Crawley and sandwiched between Brighton and London. There is no defence for building such a facility here.

We are lucky not to be an area of deprivation (the application documents themselves support this statement) so there isn't even a benefit to the local area in terms of significant numbers of new jobs or

income for the Council that could be used as a counter argument of the detrimental effects of incineration of waste in this part of West Sussex

I sincerely hope that the Council will look seriously at the negative impact that approving such an unnecessary scheme will create. The damage to the character of the local area and the health of its residents cannot be undone once it has occurred. Do the right thing and reject this application.

Yours sincerely  
Tim Peters MCIPS  
35 Billingshurst Road  
Horsham  
West Sussex  
RH12 3LJ

Acknowledgements:

[www.ukwin.org.uk](http://www.ukwin.org.uk)

Friends of the Earth – htwai.pdf