

From: [sally.pavey](#)
To: [PL Planning Applications](#)
Subject: planning ref: WSCC/015/18/NH
Date: 18 April 2018 13:01:44

Mr and Mrs R F Pavey
Warnham Lodge Farm
Mayes Lane
Warnham
West Sussex RH12 3SG

18th April 2018

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

Attention: Planning

As residents of Warnham parish we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

Strategic Objective 5: *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

The cost alone of the proposed incinerator will ensure that the owners take waste from far and wide (stated by Britaniacrest in proposals) to recoup the millions pound it will cost. The Government paper on waste 2017 illustrates the lucrative business of industrial waste management: £15.10 per tonnage of metal waste compared to EU €3.26 and £64.29 EEE and vehicle waste compared to charging €22.05.*

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

It must be noted that the residue from the Biffa site currently sent to Germany to burn which would suggest that the tonnage price in EU is lower than that of neighbouring incinerators. There are no guarantees that Britaniacrest tonnage price will be favourable to local authorities that seek the cheapest prices to deal with waste.

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 enhance the natural environment.

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.....*

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

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.*

This incinerator clearly does not meet this requirement as the proposer states waste will be sourced from outside of WSCC to keep the commercial incinerator burning 24/7 and Britaniacrest has stated that the financial backers have to be shown a return on investment in revenue from burning waste to meet the cost of

building the incinerator.

Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height. The chimney stack will be 95m tall which no UK native tree can hide. The total impact of the buildings cannot be hidden by any landscaping efforts due to the height and scale of this carbuncle of an industrial building in the countryside.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

Light Pollution

For the CAA to demand middle and top of the stack is lit at night is due to flight paths and other aircraft such as the ever-increasing number of helicopters in the vicinity of Horsham. The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site or state that routing will have to be revised, as this would create a permanent obstacle for aviation movements.

The mapping of routes included by the proposers does not include the departure route that flies over North Horsham (WIZAD/TIGER). Flight paths are not lines on the ground but in fact have an impact some 3-5 nautical miles (approx. 1 1/6 miles) either side of the flight path line. The mapping does not show arrivals and there are no mention of the 300-500 go-arounds that impact north Horsham a year from Gatwick.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate 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.

The Biffa biomechanical digester that taxpayers contributed towards in 2009 when WSCC took the decision not to incinerate waste would virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial/commercial. The EU is encouraging these biomechanic plants over incineration in the EU waste circle of household waste embracing new technology to recycle to a greater percentage.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

The project manager of Britaincrest, Keith Riley, detailed at the exhibition that Biffa recycling plant would become virtually redundant if they build an incinerator. WSCC will be seen to have waste taxpayers money by permitting planning for an incinerator.

Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35 decibels. This ambient noise levels decrease at night and the operations at the site are proposed to continue at night and so increasing sleep deprivation for those close to the plant as well as noise travels to elevated rural areas that surround the site.

Flue Stack

The proposer has submitted a chimney of 95m as they state it has to be this height to take pollution away from households.

Pollution has to come down to earth at some point and from the plume diagrams

fig 7.1 vol 2 it illustrates a concentration over highly populated areas of Horley and Crawley as well as the Sussex High Weald. The mapping provided provides only details from Charlwood, which is north of the site, and thus much be questionable to its factual evidence it provides.

There are also vital drinking water reservoirs in this direction and we question why no assessment of what the toxins from the chimney pollution, such as arsenic, metals will do to the land, peoples breathing and the water supply.

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014 that is yet to be built by Grundi. With an incinerator already with planning permission on the coast it is highly questionable why an incinerator is needed on the edge of the county surrounded by housing.

Gatwick Airport already has a new incinerator, which burns waste from Manor Royal Business Park as well as Gatwick and heats only one terminal.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old. Under EU guidance air quality should become improved and not allow to deteriorate, an incinerator on such poor roads would inevitably decline air quality.

As to the emissions pour from the stack; we do not trust or believe that the 95m stack will dissipate the ash high as it will be impacted by the 24/7 movements of aircraft and the vortex they create as they climb. It is believed that this will push the ash down to surrounding areas, which will be the new housing estate of North Horsham, with three schools, and Warnham parish and Crawley.

There is no research to prove otherwise only theory to the impact of aircraft above a stack burning waste.

The site sits in a bucket location, lower ground, surrounded by hills, which could cause the emissions to remain locally, we would site the M25 issues with localised decline in air quality due to the bucket effect at Oxted.

Operations

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

Britaniacrest Project Manager states that the WSCC taxpayer financed recycling plant will become redundant if an incinerator is built. This will make 80-90 people redundant and make a white elephant of the recycling plant that us taxpayers paid for instead of an incinerator in 2009.

Not linked to the national grid

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Compensation

There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation for the air pollution that residents will be expected to endure which unknown health implications.

There is no compensation being offered to those whose homes will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

As per norm when building new roads or other major infrastructure projects there is a level of compensation offered to those impacted by such development. It is clear that this planning application offers no such compensation or consideration to the devaluing of a rural, nice place to live currently.

UK Cross Party Political oppose incineration

UK Win are behind the political cross party Early Day Motion (581)* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK, but this legislation will come way too late for West Sussex.

Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

*<http://www.parliament.uk/edm/2017-19/581>

Recycling targets nationally go up in smoke as more incinerators are built than required (Daily Mail April 2018). There have been 21 incinerator plants since 2010 when there were already 23 built and another 18 more being built. 10 Million tons of household waste was incinerated in England in 2016 compared with 4.3m in 2010 but since 2010 the amount of rubbish suitable for incineration is down from 30m tons a year to 26m as not all waste can be burnt.

Professor Peter Edwards of Oxford University's chemistry department said "It can be harmful and incineration of course also produced high levels of greenhouse gases."

European Commission (EC) calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing

out support for mixed waste incineration. (29 January 2018)

'The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs.

..... EfW process – must be redefined to ensure that increases in recycling and reuse are not hampered, and that overcapacities for residual waste treatment are not created.

Long-term circular economy perspective - The EC's communication reads: *'In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy...*

'Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators. For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.'

<https://resource.co/article/european-commission-warns-incineration-could-hamper-circular-economy-11632#.WshI2EnzwLA.mailto>

We re-iterate that we strongly oppose the Britaniacrest proposals for an incinerator at Wealden Brickworks.

Yours sincerely

Mr and Mrs R F Pavey