

## Objection to Planning Application WSCC/015/18/ NH

**Britaniacrest Recycling Ltd - 3<sup>rd</sup> May 2018**

I wish to register the strongest possible objection to the planning application by Britaniacrest Recycling Ltd for a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure, at the former Wealden Brickworks in Langhurstwood Road, Horsham, West Sussex, RH12 4QD.

I am a paediatric nurse, general nurse and health visitor. I attended Britaniacrest's Public Exhibition on 8.10.16 and North Horsham Parish Council's Public Meeting on 20.4.18. I have spent many hours reading documents, reports, objections and talking to people to inform myself about this issue.

I live in Holbrook, 1.4 km, 0.8 mile from the site. We are already affected by smells from existing operations at that site, increasing levels of noise and pollution from HGV and other traffic and aeroplanes. The 95m stack and the enormous plume will be visible from our garden and road. This will be a constant reminder of the risks of living so near it and will devalue our property, which currently has rural, residential views. We were considering moving to the new North Horsham Development, but now like many others will seriously consider moving out of the Horsham area, if this planning application is approved.

**Little has changed** regarding our objections to the previous application which was withdrawn: WSCC/062/16/NH. I am very concerned that many people think that their objections to the previous application still stand and hence have not objected to the revised proposal. There has been a distinct lack of information from the both developer, District and County Councils.

It is so close to existing housing and businesses in North Horsham, Warnham and Rusper, to Warnham Station and the new Liberty Property Trust housing development.

### **Pollution**

A friend was told by a Britaniacrest expert at their Public Exhibition that inhaler users would just need to use their inhalers more often, that is totally unacceptable. I was told that the HGV diesel pollution is a great health concern. I know a number of people who already have severe breathing difficulties with the current levels of pollution, they often end up in hospital. I fear that they would no longer be able to live or work here.

The **incombination pollution** from the adjacent landfill, Brickworks, BIFFA works, HGV and other traffic on the busy A264 and A24 and aeroplanes from nearby Gatwick, all need to be considered, not just predicted data from the incomplete plans for this incinerator.

WSCC has decided to have traffic lights and alterations to roundabouts on the A264 from Kilnwood Vale to Southwater, and reduce speed limits to 50mph, this will slow down the traffic and it will be waiting at the signals, increasing the non-green impact of HGVs and other vehicles.

This commercial proposal will take in commercial and industrial waste from around West Sussex and neighbouring counties, recycle some of it and burn the rest. There is no benefit to local residents or WSCC, and no guarantees that it will be cheaper than what is currently paid to export the waste which is incinerated in Germany.

**The WSCC Waste Local Plan 2014** states that: *"Planning applications must be determined in accordance with the statutory development plan unless material considerations indicate otherwise."*

The development is not compliant with the planning policies of the West Sussex Local Plan 2014, Horsham District Planning Framework 2015, National Planning Policy Frameworks and National Planning Policy for Waste and the strategic objectives / policies within. Other objectors have documented and referenced these in great detail including North Horsham Parish Council, Liberty

Property Trust, The Council for the Preservation of Rural England, UKWIN, Warnham Reserve and No incinerator for Horsham.

The Land North of Horsham planning permission has been given to build up to 2,750 homes in the adjacent area with the Section 106 awarded. The 6-week Judicial Review period has come to an end without being challenge by Britaniacrest or anyone else. There are a number of material considerations for WSCC to take into account which should lead them to refuse the planning application.

The application does not comply with West Sussex Waste Local Plan 2014 including the following:

The proposal size is excessively large and high and will have a major impact on Horsham, surrounding area and 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.*

Commercial and industrial waste would be transferred long distances from West Sussex and other counties to feed a very large incinerator. We already have a Mechanical & Biological Treatment plant in Horsham, on the site adjacent to the proposed incinerator. West Sussex County Council and the taxpayers of West Sussex made a significant investment in this MBT facility and WSCC has been very successful leading the way in recycling. WSCC is only responsible for municipal waste.

Members of the European Parliament voted on the EU's Circular Economy Package to take another step towards a truly sustainable European economy. It is estimated that for every 10,000 tons of waste, 36 jobs can be created if it is recycled, and up to 296 if it is reused, compared to one job in case of incineration or six jobs in case of landfill. <https://www.greens-efa.eu/files/doc/docs/6706d1f76fbd7dafb124f5f9ce88d7dc.pdf>

A paper released last year by the European Commission (The Role of Waste-to-Energy in the Circular Economy, 26.01.2017) warned that incineration would hamper the circular waste economy. They recommend investment in more recycling capacity and anaerobic digestion instead.

**Strategic Objective 8**

*Proposals for waste development will only be permitted if they do not have an unacceptable impact on the character, distinctiveness and sense of place of the different areas of the County. Proposal should retain important characteristics and features and where possible development should reinforce the main natural character areas.*

The proposed site is a rural area despite the operations that already take place there. The development is considerably higher than the existing buildings, well above the tree line.

**Strategic Objective 10**

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

I cannot find anything about the proposals which would enhance the natural environment. It will detract and blight being visible from 15kms away in rural areas including areas of Outstanding Natural Beauty.

**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 the rural village of Warnham, surrounding rural communities, Horsham and on the North Horsham Development, so 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.*

The incinerator does not meet this requirement as the applicant states waste will be sourced from outside of WSCC to keep the commercial incinerator burning 24/7.

**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.*

It will harm the health and amenity of existing and proposed local residents, businesses and visitors. The emissions will include lead, mercury, dioxins and cadmium. The increase in road traffic and the impact it will have on business and social travel in delays and detrimental impact on Horsham as a whole.

**Policy W21: Cumulative Impacts**

*Notes that development will be permitted only where the proposed development combined with other existing/ planned developments do not result in an unreasonable level of disturbance to the local environment. Phasing agreements may be sought to minimise adverse impacts.*

The intensification of use on this site for waste management facilities will result in an unreasonable level of disturbance to the environment and the local community, including the new residents of the North of Horsham, during construction and subsequent operation of the site, with increased noise, dust and other pollution and diesel fumes from HGV's.

**Visual Impact**

The stack of the brickworks is 26.5m high. The proposed incinerator building will be taller than this at 35.92m. The stack will be 95m tall and visible from 15km away with plumes ranging from 6m to over 400m coming from the top. The total impact of the buildings cannot be hidden by any trees or landscaping and will be seen from as far away as Box Hill. Any planting to hide the car park and other low-level features will take years to fully mature. It will be totally overpowering and intrusive day and night. The design of the stack is not complete, there could even be two stacks which similar incinerators have, this would have an even greater visual impact.

**Light Pollution**

Permanently illuminated steady red obstacle lights are demanded by the CAA on the middle and top of the 95m high stack, lighting it up like a giant Christmas tree and the four highest corners of the enormous building will also be lit, to avoid endangering the safe movement of air traffic. These and other lights on sight will produce significant increase in light pollution in this rural area. We need to bear in mind how low planes fly over nearby Rusper.

**Noise Pollution**

Operating 24/7 the site will create noise above the ambient noise enjoyed by rural areas of 30-35 decibels. This will have a significant adverse impact on residents and is therefore contrary to Policies W10 and W19 of the West Sussex Waste Local Plan; policy 24 of the Horsham District Planning Framework (2015) and paragraph 123 of the National Planning Framework (2012). Ambient noise levels decrease at night but Britaniacrest have admitted that they are struggling to reduce the noise to a level compatible with a rural location.

## **Odour and Dust Pollution**

Those who live close to the site are already affected daily by dust, odours and litter from the current HGV movements, road sweepers and cumulative effect of all the current operations on that site. That will increase as Britaniacrest are only currently using 43% of lorries that they are permitted to use daily, so a 57% increase is allowable without seeking any further permission.

## **Recycling**

WSSC 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 and Wales. Government is already beginning to consider compelling evidence that there is overcapacity of waste incineration in the UK. In the EU they have to import waste in order to feed their incinerators.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSSC 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.

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.

**WHO advises that areas near a waste incinerator should not be populated**, but this incinerator would be next to existing housing, the new North Horsham development, and three new schools, as well as the existing nursery schools and businesses will be affected as the plume will also head over nearby towns and we do not know where the harmful residue and nanoparticles from it will fall as well as the gases.

If the proposal goes ahead with resultant and cumulative pollution, land contamination, and reduction of air quality. The applicant has not provided adequate evidence to support no impact to human health and the Carbon Assessment appears to be flawed.

**Potential impacts of incinerator traffic** sought in advance under previous planning applications WSSC/018/14/NH and WSSC/021/15/NH - this level of traffic has not yet been achieved so any data used in the application is not accurate. The changes now approved as part of North Horsham have not been taken into account - of most note the changes to access to Langhurstwood Road. Sustainable methods of transport are not being used even though Warnham Station is adjacent.

**Inadequate public consultation** of local residents, including input into the design and sharing of the Environmental Statement. For such a large impactful development such as this, greater promotion/exhibition space and timing of such should have been reflective of the population affected. The two exhibitions were poorly promoted with insufficient notice.

**Impact of Wake Vortices from aircraft movements** on the dispersal of pollutants/plume behaviour in the local vicinity of the proposed incinerator has not be adequately assessed. These can result in driving the dangerous emissions back down to ground level and thus undoing the primary purpose of the excessively tall stack and emission treatment technologies. Consideration of the consequences of wake vortices should also consider future changes to flight paths, increase in aircraft traffic and changes in Government policy in expanding Gatwick Airport.

## **Increased risk of fire and resultant health risks**

The incinerator and the use of flammable materials to operate it will increase the risk of fire to the location. There is insufficient information on what the impact could be to the local community if a fire

were to break out, especially bearing in mind the businesses in operation on adjacent sites, the MBT, brickworks, landfill, and areas of ancient woodland. This cumulative risk is not addressed.

**REDUCE the amount of waste we produce and RECYCLE more**, this is better than destruction by burning. In West Sussex we have supported this initiative for many years, which is why we rejected previous plans to build an incinerator and built an MBT plant instead, years ahead of the EU conclusion that this was preferable technology to incineration.

**The fine particulate matter in emissions (PM2.5)** is associated in many studies with cancer. I have already had treatment for cancer as have a number of my neighbours who live in North Horsham, it would be very interesting to know if cancer rates are already higher in this area from the pollution we are already affected by.

**The current 'safe' level for dioxin emissions** is based on limited studies that have shown the level at which there is no obvious and immediate harm to fully grown adults. What about the effects preconception, on unborn babies, our children and long-term impacts to health? Where is the evidence that these are safe?

### **Electricity**

The claim about the benefit of the electricity production is largely a red herring, it is disappointing to see that despite the developer's publicity regarding electricity there are no proposals other than to use approximately 3 megawatts by the facility itself. They are expecting others to provide the plans and connections to the National Grid or elsewhere for the remaining 18 megawatts per annum. That all should have been an integral part of the design plans from the outset.

How will the rest of that energy be dissipated or will it just contribute to global warming?

### **Further Information**

I am very concerned about the extent of missing and inaccurate data and misleading information repeatedly highlighted by the comments of experts on Britaniacrest's proposals, so it cannot be assumed that the proposed facility represents an improvement over landfill.

The applicant's proposed 'worst case' scenarios could be significantly underestimating the potential permitted emissions from the plant, and there is always a risk of accidental spillage / fumes of dangerous chemicals, so it should not be built so close to other businesses or residents.

It is near Warnham Nature Reserve and in the valley of the Boldings Brook stream that feeds the reserve and then goes on to run around and through Horsham. This key local amenity is used by large numbers of Horsham residents, dogs and wildlife and putting this stream at risk is unacceptable.

Even if the effect on health can be mitigated, the fear of health impact can be a material consideration. These matters, both individually and in combination with other sources of pollution such as aircraft and traffic movements, need to be analysed together.

The development should not be allowed to proceed unless both the EA and WSCC are able to demonstrate that the health concerns can be overcome; and that it is clear how monitoring and enforcement of emission standards will be conducted independently of the operator.

Waste to feed the incinerator will be transported across county borders polluting the air we breathe with Co2 and Nox, damaging our health and the environment.

Recent developments are already leading to reduction in use of plastics and packaging and more recycling. Plastic can now be broken down into enzymes and can be recycled to repair roads, create board walks etc.

Significant harm would be caused by the proposed development, I cannot find any evidence of benefit to the current and future local community or future generations.

## **Not necessary**

West Sussex County Council granted permission for an incinerator at Ford in 2014 that is yet to be built.

**CPRE Sussex is demanding a full investigation** into how and where the pollutants emitted by the facility, individually, collectively, and cumulatively over time, could or would impact on farmland, livestock, the natural environment and reservoirs.

**CPRE are hosting a Public Meeting**, but unfortunately this will be after the deadline for comment on this planning application. I hope County Councillors will attend and hear for themselves the various points of views discussed.

**Why were Britaniacrest allowed to make a presentation** to the council in addition to all the documents submitted as part of the planning application but No incinerator for Horsham, which represents local residents, has not been allowed to make a presentation?

**Currently Britaniacrest are only using 43% of permitted HGV traffic**, so without needing to apply for an increase in the level of permitted traffic, they will have 57% more HGV traffic to and from the site.

It is a commercial venture which could be sited anywhere. Waste from all over the country and maybe even from Europe. Our roads and infrastructure in a rural aspect cannot cope, they currently clog up every day.

**We do not know who the builder or operator will be or their track record for safety** and consideration of the local community during construction and operation.

**This proposal by a private developer is purely for profit.** Who is the legal owner of the land? Who are the investors behind Britaniacrest who have been waiting 10 years to spend 150 million pounds expecting to make a profit at our expense? Is there any conflict of interest with those who were elected to represent the people they serve, who will be making decisions which will affect so many lives in this area and beyond?

**Accurate figures are needed for WSCC** to be able to assess the potential impact on health from emissions from the stack during the operation or as a result of an on-site fire. The North Horsham development includes primary and secondary schools, and it has been proven that **young children are especially vulnerable to air pollution**. This is contrary to WSWLP policy 19.

**The proposed road re-routing through the new Liberty residential estate** is totally unsatisfactory in terms of health, safety and disturbance to a normal lifestyle.

Inevitably, emissions from this facility would have serious detrimental effect on the current population and the future population in the development planned in North Horsham. Relatively small quantities of toxins cause permanent injury to humans, wildlife and the environment which is irreparable.

## **Contact Details**

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