

Langhurstwood Road Residents Group

Abbotslea
Langhurstwood Road
HORSHAM
West Sussex
RH12 4TL

Phone [REDACTED]

Mr Sam Dumbrell
County Planning
West Sussex County Council
County Hall
Chichester
PO19 1RH

30 April 2018

Dear Mr Dumbrell

Britaniacrest Recycling Ltd - Application WSCC/015/18/NH

We are resolutely AGAINST this application from Britaniacrest and remain consistent with our objections over recent years to WSCC/018/14/NH, WSCC/021/15/NH, WSCC/062/16/NH.

During the early years after the millennium we opposed incineration for the disposal of waste and as members of HALT [Horsham Anti-incineration Linked Taskforce] helped to persuade West Sussex County Council [WSCC] to abandon any consideration of incineration and adopt a proper recycling solution. This resulted in the facilities built at Ford, operated by Viridor and Brookhurstwood, Horsham [MBT/AD] operated by Biffa in conjunction with WSCC. These facilities process all of WSCC's municipal waste, together with some waste streams from the Amenity waste disposal units.

The point we wish to make is that WSCC considered, at the time, that incineration was outside the waste treatment hierarchy they wished to be part of, so "what has changed". Britaniacrest [BCR] continually quote "but West Sussex doesn't have an Incinerator". So what, just because we do not have one doesn't mean we should have one, and anyway the Horsham area is doing more than their bit, with the location of the Biffa/WSCC MBT/AD plant taking in up to 243,000 tones municipal waste pa.

Incinerators are NOT sources of renewable energy. Renewable energy comes from wind farms, sunlight, water, tides, waves and geothermal heat.

We are founder members of the main local opposition group "No Incinerator for Horsham [Ni4H]" and as such are fully aware of, and in complete support of the official response from this group. We therefore consider it un-necessary to repeat chapter and verse of this response, but to highlight a number of areas.

The proposed utilitarian, industrial designed building and its bulk and height, together with the 95m chimney height, does not relate sympathetically with the existing and proposed built surroundings, landscape, open space, and in particular its impact on the skyline and important views for current and future residents of North Horsham, and afar. Although there have been marginal changes to the unsupported [by WSCC] application of last year [WSCC/062/16/NH], the amendments do not resolve fundamental issues. The proposal should FAIL against criteria described under Policies W11 and W12.

We contend that the BCR proposal is NOT "Recovery" [R1] as defined under the European Waste Framework Directive 2008/98/EC, BUT "Disposal" [D10]. Although there is the intention to generate power, there is no evidence provided for the utilisation of waste heat emanating from the incineration process. Such would make the operation c 25% efficient and not 65% efficient as defined for R1. Simply to state that the facility has the potential for use of waste heat is not enough, and means little. We therefore contend that this application is no more than D10 "Disposal of Waste by incineration on land" and barely up the waste hierarchy to landfill. A D10 categorisation would engender a proximity principle that waste can only be sourced from the local area, whereas it is the BCR intention to draw in waste from wherever it is economic to do so, and therefore a wide area across county lines. There is case law, and rather local case law on this issue.

We consider that this proposal is not acceptable with regards to highway capacity and road safety. It is our view that WSCC/18/14/NH which permitted 246 HGV movements per weekday, only to be increased to 284 HGV movements per weekday under WSCC/021/15/NH, as far too excessive. These allowances need to be considered alongside the 392 HGV movements per weekday permitted under the Biffa MBT/AD authorisation.

As wrong as these HGV allowances were at the time, much has changed since and much more change is planned in the future, particularly the Liberty development of North Horsham with up to 2750 homes, business park, schools and more.

BCR state that they are not looking for increased HGV movements over and above their current permissions, BUT until this time BCR are only utilising 37% [averaged monthly over the past 12 months up to Feb '18] of their 284 HGV movements per day. Therefore an incinerator will massively increase the realistic level of HGV movements witnessed to this time.

Surely, it is time for another up to date review be commissioned, allowing for all these changes rather than dependance on information which is more than 5 years out of date.

Notwithstanding our comments on HGV movements, over the past 12 months there has been fresh concerns on vehicle pollution, especially diesel engined. This local area is already greatly polluted, and these HGV movements together with the cumulative emissions to air from a brickworks, the MBT/AD waste operation, landfill, and now potentially an incinerator is just a step far too far. The health of current and future residents must be at risk, and such should weigh heavily on the consciences of decision makers.

We are aware that all operations that emit emissions to air are regulated and need to conform with legislation, BUT all permits allow a level of pollution beyond which the controls set in. Therefore even when in compliance there are pollutants such as Co2, NOX, particulates in concentrations up to at least the base level permitted. The point being made is that new emissions start well above the zero baseline and simply add to the existing. It also has to be said that compliance is a virtue of the maintenance and

condition of any application, and the degree to which regulation is monitored. Shouldn't we all be concerned?

The issue of Noise has been inadequately addressed, nor has the matter of Smell. Both are regularly experienced from the existing operations on the Brookhurstwood site, and yet mitigations fail, and fail on a regular basis, and require dialogue with the Operators and the EA. The applicant has failed to demonstrate that noise from the operation would not have a significant adverse impact on current and future residents.

There has been considerable press coverage of late that the Nation is heading for too much incinerator capacity, when considering those in operation together with those being constructed. This is already the case for some continental European Countries where it is necessary to import [from the UK etc] waste to satisfy their insatiable appetites. Once built, and at such great cost, only means that incinerators have to operate at capacity and for a life of 25/40 years. This will put at risk the recycling and reuse objectives and mean the ever increasing need for the basic mineral resources, which themselves are scarce and dwindling. Once burnt, only ash remains.

The application last year [WSSC/062/16/NH] was withdrawn prior to Planning Committee, because there was a recommendation from the Officers of refusal. This new application exhibits little to no change, and the amendments offered do not resolve the fundamental issues.

This is the wrong technology, and in the wrong place. The footprint of land ownership by the applicant is too small to shoehorn in such an industrial monolith without any consideration for the space between other facilities on the overall site, and all of this in a rural area, adjacent to a major housing development and using a road network which is totally inadequate.

We call for a rejection of this application.

Yours sincerely

Brian Johnson - for Langhurstwood Road Residents Group [LHWRRG]