
From: David Maxwell EI
Sent: 23 April 2018 09:27
To: PL Planning Applications
Cc: Planning Consultations/EAI/SCC
Subject: Comments on Planning Application: WSCC/015/18/NH - Wealden Brickworks

For the Attention of Sam Dumbrell

Planning Application WSCC/015/18/NH - Proposed Recycling and Renewable Energy Facility at Former Wealden Brickworks, Horsham

I refer to Alison Woodfield's email dated 16 March 2018 with attached letter from yourself inviting observations on the above planning application.

The proposal includes a 180,000 tpa capacity Energy Recovery Facility with a 95 metre fuel stack on an allocated waste site. The application site is situated around 2 miles south of the county boundary with Surrey and just over 4 miles south east of the Surrey Hills Area of Outstanding Natural Beauty (AONB). The proposal includes an enhanced version of the existing on-site 230,000 tpa capacity waste transfer station and materials recovery facility. In total, the new combined waste management facility will provide for the sustainable management of 230,000 tpa of household and industrial & commercial (HIC) waste arising primarily in West Sussex. The facility will have the potential to manage waste derived from East Sussex, Surrey and possibly Hampshire. It will allow for the sorting and segregation of waste for re-use/recycling with the residual fraction being subject to thermal treatment producing an estimated 21MW of electricity.

We responded to your Council's original consultation on this planning application in January 2017 raising no objection to the proposal, subject to the imposition of a suitable planning condition to ensure that the proposal would have no adverse material impact on the highway network in Surrey, by limiting the number of HGVs to those quoted in paragraph 6.13 of the original planning statement. This condition was requested in the interests of minimising the impact of traffic on the highway and ensuring that the development does not prejudice highway safety. The reasons for our response were as follows:

- the development would reduce exports of HIC waste from West Sussex to Surrey reducing the number of HGVs on Surrey's roads;
- subject to the imposition of a suitable planning condition, the proposal would have no material adverse impact on the highway network in Surrey;
- the development would have the potential to treat some residual HIC waste arising in Surrey until such time as sufficient residual waste treatment capacity is provided in the county to manage Surrey's waste;
- the development will need to comply with stringent EU emissions standards and specific emissions limits prescribed within the Environmental Permit which will ensure a high level of protection for the environment and human health;
- there is a demonstrable need for the proposed development which is considered to be in the wider public interest;
- the development would have a very limited visual and landscape impact on the Surrey Hills AONB given:
 - i. significant tree coverage limits long distance views from the majority of the Surrey Hills AONB including Landscape Character Area GW9;
 - ii. the extent of separation between the Surrey Hills AONB and the application site would result in only very distant views of the development;

- iii. the colours selected for the building and stack have been chosen to minimise the visibility of the development by blending it in with its surroundings.

Since this time the original application has been withdrawn and amended in response to comments provided by consultees and the public. The revisions are primarily intended to address concerns in relation to the visual and noise impacts of the proposal. The revisions comprise a thorough re-design of the facility comprising a reduction in height and mass, the incorporation of a curvilinear roof design, and the use of a sympathetic colour scheme consistent with the High Weald colour palette. This has resulted in the building being brought below the treeline in the large majority of views and a reduction in noise impacts using best available techniques in accordance with environmental permitting requirements.

The changes incorporated into the revised application are welcomed as they will further reduce the limited visual and landscape impact of the proposed development on Surrey and in particular the Surrey Hills AONB. As no further changes are proposed, the reasons given for our response to the original application remain valid. We note that Paragraph 6.16 of the submitted Planning Statement explains that the proposal will not give rise to an increase of HGV movements using the local road network beyond that already permitted i.e. no more than 142 HGVs Monday to Friday and no more than 70 HGVs on Saturdays. It is also noted that the applicant would be willing to accept a planning condition to this effect.

Subject to the imposition of a suitable planning condition to limit the number of HGV movements to the number already permitted, we have no objection to this revised application.

Regards
David Maxwell

Planning Development Group
Surrey County Council