

**Application WSCC/015/18/NH proposed by Britaniacrest Recycling Ltd (BCR) at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex RH12 4QD**

On this day in history, two men called de Grandpré and le Pique fought a duel over Paris from balloons in 1808. Le Pique's balloon was shot and he died in the crash.

I strongly **object** to the Planning Application and request that the application be **refused permission** because of its adverse effects, which cannot be dealt with satisfactorily by using conditions or obligations.

Horsham District Council has acknowledged that the site is allocated for the proposed use, and that it has reservations over the impact of the proposed facilities. I believe that West Sussex County Council should refuse permission for this development (and can do so without loss of face) due to the material considerations which have arisen since the Waste Local Plan 2014 was prepared.

#### **Waste Local Plan**

The Brookhurst Wood site was identified as a strategic waste site subject to a number of development principles (section 7.3.14) in the West Sussex Waste Local Plan adopted in April 2014 covering the period to 2031 ([www.westsussex.gov.uk](http://www.westsussex.gov.uk), search Waste Local Plan). The Planning Inspector in his report on the West Sussex Waste Local Plan commented that “No substantive representations were made that either allocation at Brookhurst Wood (built facility or the landfill) would render the Plan unsound”. **If that ‘consultation’ was taking place today there would be substantive representations (there are currently more than 4,000 petition signatures against this proposal and more than 1,000 objections on the WSCC Planning Portal for this application.** New guidance from the European Union has urged governing bodies to steer clear of incineration technology. A report from the European Commission says that recycling must be the focus of all waste projects and that disposing of waste in landfill or incineration is the “least favourable option”. The report says: “Member states are advised to gradually phase-out public support for the recovery of energy from mixed waste. When planning future investments on waste-to-energy capacity, it is essential that member states take into consideration the risk of stranded assets.” **The world is moving on (circular economy, Government’s Clean Growth Strategy goals for zero avoidable waste by 2050, moratorium on new waste incineration capacity (Early day motion 581)) and there is a real danger that if this proposal is approved then Horsham will be left with a white elephant on its door-step.**

**Policy W11 Character seeks to protect special landscape and townscape character of West Sussex**, in line with 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.

**This proposed development is not suitable for Horsham which is a special town:**

“Set in outstanding parkland and beautiful countryside the market town of Horsham offers a welcoming and attractive shopping, meeting friends, visiting local attractions and eating <http://www.thinkhorsham.co.uk/44>

**Approval of this planning application will have an unacceptable character and sense of place of Horsham - a point emphasised by a number of residents who have recently moved to Horsham who are objecting to this proposal. Horsham is a town not an industrial city.**



award-winning environment for out.”

**impact on the**

**Policy W12 High Quality Development requires waste development to be of a high quality**, taking account of the need to integrate into and enhance where possible adjoining land-uses to minimise potential conflicts. Developers should also have regard for the local context, including local traditions, character, topography, landscape and skyline. Consideration should be given to views inside and outside of the site and the use of materials and building styles. Proposals must maximise water efficiency, measures to reduce greenhouse gases, and potential for renewable energy. New development must be resilient against the impact of climate change. **This proposed**

development does not integrate into and enhance adjoining land-uses to minimise potential conflicts. The proposed incinerator would be situated alongside the social housing to be built as part of the Land North of Horsham proposal. It has been said that the poor have had to live alongside industrial sites/factories for hundreds of years but this is 2018, not 1918 and this no longer has to be the case. An industrial incinerator can hardly be classed as a high quality development and it does not fit into the local context of Warnham and Holbrook Parishes.

**Policy W13 Protecting Landscapes** states that proposals located outside the South Downs National Park and Area of Outstanding Natural Beauty (AONB) will be permitted provided they do not undermine the designations. The CPRE's 'How to respond to planning applications: an 8-step guide' asks the question about cumulative development: "Could a proposal, broadly acceptable in itself, be a **stepping-stone to something that would be unacceptable?**" The proposed incinerator would be built within a rural area. Although, there are buildings on the site which are used for industrial purposes, approval of this planning application would set a precedent and may lead to the further industrialisation of Langhurstwood Road and the surrounding area. This is self-evidently inappropriate as the Land North of Horsham development has now been approved, the Section 106 monies agreed and the Judicial Review period has passed (during which time the applicant could have objected). The application site will be visible from within the High Weald AONB. This massive building has the potential to inflict a significant negative impact on the landscape. Approval of this planning application would set a precedent for further industrial development in the North of Horsham which is not part of Horsham District Council's Strategic Plan.

**Policy W18 Transport** requires, where practical and viable, that proposals make use of rail. Development will only be permitted where transport links are adequate and vehicles generated from the development do not have an unacceptable impact on local amenity, character or environment. Where the need for road transport is demonstrated, materials must be transported using the Lorry Route Network. Increased vehicle movements must not have an unacceptable impact on local highways capacity and the safety of road users should not be adversely affected. Proposals must be designed with adequate lorry turning space. **No use of rail has been proposed despite the fact that the proposed incinerator site is adjacent to a railway line.** WSCC has approved the signalisation of the A264 from Kilnwood Vale to Southwater which will impact the dual-carriageway adjoining Langhurstwood Road, reducing the speed of vehicles to 50 miles per hour or under and increasing the number of vehicles waiting at traffic lights. The impact of this will be that if the number of HGVs going to and from the proposed incinerator site reached capacity then all these vehicles would periodically be stationary at traffic lights emitting unhealthy diesel fumes.

**Policy W19 Public Health and Amenity**, in line with **Strategic Objective 13**, outlines that any emission from the development (lighting, noise, odour etc.) should be controlled to avoid adverse impact on public health and amenity. Public rights of way should be safeguarded. Where necessary a site liaison group should be established to allow communication between the site operator and local community. **The South Downs was awarded International Dark Sky status in May 2016 to reflect the quality of the skies. The lighting of the building and lights to alert airplanes to its presence impact adversely on the local 'dark sky'.** A new state of the art incinerator at Dargavel in Dumfries has had its operations restricted by SEPA (Scottish Environmental Protection Agency) due to airborne dioxin releases at up to two and a half times the permitted levels. An article reporting on the situation states: " ..these new 'state of the art' plants are always touted at Planning Inquiries as being 'perfectly safe' and 'operating within tolerable levels', posing 'little or no health risk'. Clearly this latest news shows these assertions to be nothing more than a fabrication and **it should reinforce residents' objections to these plants on health grounds.** Incinerator firms are now well versed at playing down the health risks at Public Inquiries, backed by various other Quangos and the Government themselves who insist that the health risks are negligible at best. This news should push the health card higher up the agenda once again, and rightly so as these plants are long term health time bombs and could become the 'asbestos scandal' for the next generation."

<https://www.anti-incinerator.org.uk/toxic-emissions-from-scottish-incinerator-spark-cancer-fears/> **There is insufficient evidence that siting an Industrial Incinerator in close proximity to a residential area is a safe thing to do.**

**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. **There would be an unreasonable level of disturbance should this planning application be approved – not only at construction stage, but at an operational stage ie the capacity-level HGVs lorries patrolling the area emitting diesel fumes, and the disturbance to the local environment.**

#### **Environmental statement - alternatives to the development proposal**

The CPRE's 'How to respond to planning applications: an 8-step guide' states: "If an assessment is required, the developer must present an 'environmental statement' along with the planning application. This should explain how measures taken in the development do the least possible harm to the environment and what that harm will be. **Environmental statements should look at alternatives to the development proposal. The public has the right to comment on the environmental statement.**" **The Environmental Statement submitted with the Planning Application does not consider alternatives to the development proposal.**

#### **Statement of community involvement**

**This is deemed to be unsatisfactory. A few hours' communication exercise in a back room at Roffey Millennium Hall over a couple of days was really not sufficient in order to communicate the significant proposals to the public. A very large proportion of people I have spoken with had no idea that this proposal was on the table again. I think there is a certain amount of disbelief that this is a serious proposal in this place, at this time.**

**Rosemary Couchman**

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