

From: [Sarah Burling](#)
To: [PL Planning Applications](#)
Subject: WSCC/015/18/NH
Date: 02 May 2018 21:02:28

Dear Sirs

Subject: OBJECTION Reference WSCC/015/18/NH BritanniaCrest Warnham Brickworks Incinerator

I would be grateful if you would register my OBJECTION to this application

General principles

Britaniacrest bought land in Horsham and initially got planning for recycling and transfer waste operations. This proposal is to add a huge incinerator to this site which will take industrial waste materials from across southern counties of England.

WSCC taxpayers paid for the biomechanical digester on this site only a few years ago. Visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. The proposer has stated that they intend to burn black sack waste as well as industrial. This is an unacceptable waste of WSCC and West Sussex taxpayer's money.

As the site is small Britaniacrest propose building at double height (36m) with a 95m chimney This is far higher than the existing brickworks chimney which itself is a visually-intrusive landmark. The roof is arched to try and obscure the fact that this is an enormous building, but the fact remains this is far too big and high for this site.

This application is contrary to the West Sussex County Council's Waste Local Plan

Absence of need The UK already has surplus capacity for burning waste. Government ministers are starting to push for a moratorium on incineration facilities.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within five years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Furthermore, incineration plants in the EU are already being decommissioned because reduced availability of suitable waste has significantly reduced the amount of material available to fuel the burners. Many countries are now having to import material to incinerate.

Will lead to a reduction in recycling WSCC have achieved 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. Government is already beginning to consider compelling evidence that there is over capacity of waste incineration in the UK. The experience of the EU is that they have to import waste in order to feed their incinerators and there is a correlation between increased incineration and decreased recycling.

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.

The scale of this plant exceeds the needs of West Sussex. As a result it will need to seek waste from outside the local area and so will encourage commercial waste being transferred over long distances.

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 protect or enhance the natural environment.

Strategic Objective 11: To protect and, where possible, enhance the natural and historic environment and resources of the County.

There is nothing to suggest that this will enhance the local area. It will detract and blight the natural and historic environment being visible from 15kms away in areas of Area of Outstanding Natural Beauty. In addition I believe the pollution from the emissions including lead, mercury, dioxins, the increase in road traffic and the impact it will have on business travel in delays and detrimental impact on Horsham as a whole.

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.....

It is questionable if this policy will be met by this proposal, as it will be seen from rural villages and detrimental impact on Horsham and surrounding rural communities.

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 Britaniacrest proposal does not meet the criteria set out above.

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.

The proposals will require aviation lighting as well as have a night-time noise impact on

the neighbouring communities creating light pollution for the area.

The proposed development is unsuitable for the site

Light Pollution The stack will need to be extremely well lit due to the proximity to the Gatwick flight path and in so doing it will produce a significant increase in light pollution from the plant.

Flight paths Flight paths are not represented fully or accurately in the proposal. For the CAA to demand middle and top of the stack is lit at night is due to flight paths. The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site. The mapping of routes included by the proposers does not include the departure route that flies over North Horsham. Flight paths are not lines on the ground but in fact have an impact some 3-5m either side of the line. The mapping does not show arrivals.

Noise Pollution As the site will operate 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. Ambient noise levels decrease at night and Britaniacrest have admitted that they are struggling to reduce the noise to a level compatible with a rural location. At the operational stage it is acknowledge in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This is a significant increase in noise inflicted on local residents.

Visual Impact of the development The proposal does nothing to hide the impact it will have on the rural countryside in which it will sit amongst. It is over-powering and intrusive day and night as it sits above the natural tree height canopy. The intrusion of the stack will be particularly intimidating at times when exhaust plumes are being emitted. The application documents state that the plume height could range from 6m to over 400m from the top of the 96m chimney.

I hope that all the points above will be fully considered and that sense will prevail and this application will yet again be rejected.

Yours faithfully



Sarah Burling