



# North Horsham Parish Council

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

27<sup>th</sup> April 2018

Dear Sirs,

## **Planning application:- WSCC/015/18/NH**

North Horsham Parish Council held a well-attended public meeting to hear the views of residents and has used the genuine concerns and comments from that meeting as a basis to respond to planning application WSCC/015/18/NH - Recycling, Recovery and Renewable Energy and Ancillary Infrastructure at the former Wealden Brickworks, Langhurstwood Road, submitted by Britaniacrest Recycling Ltd described as an Energy from Waste facility by the applicants.

**The Parish Council strongly objects to this application on the grounds that the design, height, size and mass of the buildings has a detrimental effect on the local landscape and distinctiveness of the area and that there is insufficient evidence to satisfy the Parish Council that there will be no adverse effect on the health and wellbeing of local residents from the plant and vehicle emissions to and from the site.**

The National Planning Policy Framework (NPPF) (2012), Horsham District Planning Framework (HDPF) (2015) and West Sussex Waste Local Plan (WSWLP) (2014) set out clear guidelines regarding the quality and character, principles of and sustainability of development. In the opinion of the Parish Council, supported by local residents, the application is not in compliance with policies within these documents. Areas of non-compliance are noted in the comments below:-

- 1. Design, height, size and mass of the proposed buildings** (*Does not comply with HDPF (2015) Policies 25,26, 32 and 33 and WSWLP (2014) Policies W10, W11 and W12*)

The design, height, size and mass of the proposed buildings is significantly higher than buildings in the surrounding area and they do not complement the local distinctiveness of

the area which is that of countryside surrounding a Sussex market town.(HDPF(2015) Policy 32, WSWLP (2014) W11). Furthermore, the height, size and mass of the building and the flue stack is not sympathetic to the site setting in terms of topography, landscape and skyline (WSWLP (2014) W12). The proposed siting of the buildings and flue stack, on land that sits quite high within the landscape, accentuates its presence and its urban feel. This will be exacerbated by the exhaust plume, which when visible, could rise hundreds of metres into the sky at certain times. The flue stack will visually impact the High Weald Area of Outstanding Natural Beauty and other designated areas of special significance in the wider area. The overall size of the complex is disproportionate to its setting and there doesn't appear to be any specific reason for a facility of this kind to be located at this site, it would be better placed in a position where it has good transport links and away from residential development.

## **2. Health concerns and emissions** *(Non-compliance with NPPF (2012) Policy 8, 10 and 11 also WSWLP (2014) Policy W12 and Policy W19)*

Air quality raises serious concerns as there is not sufficient information surrounding long term health issues associated with the incineration of waste, especially in respect of elements that are stored in the body and which can be transferred to unborn children. Members of the public are genuinely concerned about increased health risks from breathing in emissions which could lead to birth defects, cancer, spina bifida, heart defects, infertility and respiratory diseases. The residual effect of the emissions to the land and watercourses is also unknown and of concern. There is still no information from the applicants regarding the ultimate level of the Carbon dioxide, Nitrous oxide and other emissions generated from this facility. However, with a capacity of 180,000 tonne per annum it is realistic to expect that the proposed operation could produce serious volumes of emissions over the anticipated 30year operational period which could have a cumulative effect on health. The potential for noxious odours to emit from the site is also of concern to residents and raises further questions about the safety to health from emissions in general.

The Parish Council has concerns that the incinerator is sited under the flight path to and from Gatwick Airport and the potential impact on emissions from turbulence from aircraft overhead. This specific factor could have a significant impact on how the particles in the atmosphere spread and disperse, and could cause increased risk, but further study would be required.

The facility will be sited next to residential properties and schools, directly in conflict with advice given from the World Health Organisation who recognise potential health issues from facilities of this type. The BIFFA Mechanical Biological Treatment facility, landfill site and Weinerberger brickworks adjacent to the site already produce gases, therefore, the cumulative effect of all pollution increases concern about the air quality and its effects on local residents.

There still appears to be no information on the impact to the environment on vehicle movements associated with operating the incinerator. Whilst diesel engine vehicle movements associated with the operation are not planned to exceed those allowed within existing planning conditions, there will be an increase in movements to the present and

the resulting pollutants will rise commensurately reducing air quality. The Parish Council has major concerns that waste from outside the County will be needed to ensure that the incinerator is kept at its correct operating level and to ensure that the facility remains profitable. In the proposals for the development north of Horsham, Langhurstwood Road will be cut off from the A264 and the new access road leading to the facility will be through residential property. Levels of pollution from diesel fumes along the route taken by lorries will increase if more waste is brought to the site.

Once in use, the plant has to run continuously, without interruption. Noise on neighbouring properties and the wider area is of genuine concern to residents as is light pollution. At the very least, the flue stack will require illumination with red lights to enable it to be seen by aircraft. Residents who live in the vicinity of the facility are already affected by noise levels. Now that the application for 2,750 houses in North Horsham has been approved, there are likely to be more people impacted by noise from the 24-hour operation.

The Parish Council are of the opinion that to ensure that vehicles do not block the Access Road and use local lay-by's the weighbridges must be relocated to provide adequate waiting bays for HGV's entering the site.

The Parish Council has not seen evidence that Sections 8,10 and 11 of the NPPF, which refer to healthy communities, the challenge of climate change and conserving and enhancing the natural environment along with HDPF (2015) Policy 33 and WSWLP (2014) W12 are being adhered to.

### **3. Land allocation and its consequences**

It would not seem sensible to allocate land strategically in the Horsham Planning Development Framework for residential development North of Horsham when land adjacent had been allocated as a site for waste by WSCC. Building a Recycling and Incineration plant next to the proposed development north of Horsham, which includes 2,750 dwellings along with community facilities, poses a conflict in land use as evidence points to there being adverse consequences to quality of life to those living nearby. There is the potential for the health of those living on or close to the new development to be effected by emissions from the operation. Additional traffic from this and other developments surrounding Horsham also pose issues with regard to the increase in traffic and add to potential traffic emissions which combine to cause significant issues.

### **4. Litter in the landscape**

Residents already face real issues with rubbish blowing from lorries and littering the highway along Langhurstwood Road. Road sweepers are employed to clean the road on a regular basis to keep on top of the issue. Additional lorry movements will inevitably produce more litter and a greater nuisance to those living on the route from the A264 to the incinerator site.

The enormity of the impact that this application has on north Horsham cannot be understated. Therefore, in conclusion, the Parish Council re-iterates that it strongly opposes this application.

Yours faithfully

Pauline Whitehead BA (Hons) FSLCC  
Clerk to North Horsham Parish Council