

16 June 2018

**Planning application WSCC/015/18/NH : Former Wealden Brickworks
Additional comments**

1. Britaniacrest's "Britania Bulletin" dated January 2018, submitted as part of the documentation supporting the above application, includes claims relating to a reduction of NO₂ pollution if the incinerator is built and operated. These claims also appear in the mobile exhibition panels used for public consultation. These claims are unsupported by any evidence in the application documents. In fact examination of the application documents suggests the exact opposite: that there will be a significant increase in NO₂ pollution.
2. In the applicant's Carbon Assessment (Volume 3 Appendix 2.3 Para 9.6) the applicant claims vehicle kilometres will be reduced by 157,140km per year. Although the applicant has advanced no evidence for NO₂ reductions, we can give the applicant the benefit of applying this reduction of HGV movements to total NO₂ emissions. Assuming that Britaniacrest intend to operate HGVs fitted with NO₂ abatement conforming to Euro X1 standard, as they should, NO₂ emissions are limited to 0.4g per Kwh. Website <https://www.rix.co.uk/blog/2016/7/adblue-what-diesel-vehicle-owners-need-to-know/> suggests that this equates to approximately 0.4g per km. Though there may be some margin of error, this seems a reasonable figure to work from. Applying the figure of 0.4g per km to the figure of 157,140 km provides a saving in NO₂ emissions of 62,856 grams, or approximately 63 kgs.
3. Let us now look at the NO₂ emissions which will be emitted by Britaniacrest's proposed incinerator, using their own figures.
4. In the applicant's Air Quality and Odour Assessment (Volume 1 Chapter 7, Table 7.8 Mass Emissions), NO_x emissions are forecast to be 9.7 grams per second, equivalent to 34.92 kgs per hour. The applicant suggests the incinerator will be operational 8760 hours per year, providing total NO_x emissions of around 305 tonnes per year. Applying the applicant's suggestion that 70% of the NO_x will be converted to NO₂ (Para 7.3.37) as it descends to ground level, we can assume that roughly 213 tonnes of NO₂ will be added to current ambient levels.
5. These emissions do seem to fit within the limits set by the Environment Agency (the daily mean emission limit of 200g per cubic metre of stack emissions). Applying that limit figure to the predicted volumetric flow from the stack (Table 7.7) provides a limit level of 47.80kgs per hour of NO_x emissions.
6. However, the fact that the NO₂ emissions are within permitted levels does not mean that they are necessary or justified. It has been shown in other objections to this application that, when the applicant's calculations are corrected, the CO₂ impacts of the proposed incinerator will be worse than current practice. In my own previous objection it has been shown that electricity generated and exported by the incinerator will not conform to the benchmark for new generating capacity and will undermine government policy to decarbonise the electricity grid. From an energy generation standpoint there is therefore no need for the incinerator, and indeed the application contravenes Policy 24 of the Horsham District Planning Framework. The incinerator will have no

value as a waste recovery system.

7. As a waste disposal option, the applicant has also failed to demonstrate need. While there will be for some considerable time ahead waste incinerators in the UK and mainland Europe with CHP systems attached and a proven shortage of feedstock, it is unjustifiable to build and operate an inefficient incinerator (with no guarantee of heat use) in a location where additional NO₂ emissions may negatively affect the environment; especially given the applicant has demonstrated no intention to improve the sorting of incoming waste to drive up recycling and drive down residual waste levels. The applicant has failed to provide any analysis comparing the relative CO₂ impacts of processing and exporting RDF to CHP incinerators in mainland Europe with this application. It is the planning authority's responsibility to take a view on the need and relative climate change impact of such planning applications.
8. To summarise: the applicant appears to have sought to mislead the public and the council by suggesting a nett reduction in NO₂ emissions, when in fact the incinerator will generate a very significant increase in NO₂ levels without any justification.

