



26<sup>th</sup> April 2018

Dear Mr Dumbrell,

**PLANNING APPLICATION WSCC/015/18/NH**

Please accept this letter to formally object to the planned Britaniacrest plans to develop an incinerator on Langhurst Wood Road.

I have reviewed the changes made since application WSCC/062/16/NH and believe that there is no material change to the reasons why WSCC planners recommended for the Planning Committee to refuse the planning application. I would therefore urge the same recommendation is made for this revised application.

My own personal grounds for objection are as attached. I note some are not grounds for planners to take into account but would like to register them regardless.

Yours faithfully,

Kirsty McShane

1. The site is not suitable for the size, scale and chosen technologies proposed in this development. This has led to a building which is scaled too big and too tall, of significant bulk for the site and the town of Horsham. The building and chimney will be overstated, intimidating and will become an inappropriate land mark for Horsham. The building remains ugly and uninspiring. I am of a view this development will be detrimental to the landscape and town of Horsham and its residents.
2. Large areas of Langhurst Wood Road are still rural in nature with pockets of arable farming. The low density of housing will grow significantly with the North Horsham development. The conflict between all the land uses have been successfully managed to date; **the introduction of such an over-sized industrial building and process will reduce the balance achieved leading to the further degradation of a permanent nature of the rural suburbs of Horsham and Warnham.**
3. **Langhurst Wood Road is already a problem for residents in terms of road noise, litter from the waste businesses operating in the area, vehicle derived vibration, dust and dirt.** I feel it is unsafe now to walk or cycle from my house as a result of the 700+ HGV vehicle movements at a speed which is not suitable in my view on what is a rural country road. I leave and come home when it is dark and am often put at risk walking down Mercer Road and Langhurst Wood Road. I do not feel that the road is at an acceptable safe level, and equitable to all modes of movement. Walkers and cyclists are being dismissed as road users. In my view, a dedicated road to provide access to the Brockhurst Wood site is needed for all waste HGVs.
4. **The incinerator will increase noise during the evening and weekends when I will want to be sleeping/ resting, and potentially add to the unreasonable odours, vermin annoyance already experienced from being close to the landfill and MBT.** Although the impacts are largely felt by the businesses and residents living further up the road (north of Brookhurst Wood waste site), most weeks there is a need to raise issues with the Environment Agency. I am not convinced that the incinerator will not add to that further as they plan to make use of the same mitigations as the MBT which clearly fail on a regular basis.
5. **The light pollution from a 24-hour operation will be both a new and a permanent annoyance.** My house faces the direction of the site. My living room, and 2 bedrooms will be impacted by the permanent intense lights on the 95metre high chimney and the lighting around the building.

6. **I have concerns about the risk to my family's and my own long-term health.** The combined pollution from all the business and vehicle activities in Langhurst Wood Road have not been adequately quantified. The air quality has not been tested within this vicinity and I suspect will be far worse than other areas within the town as a result of the high levels of traffic/ proximity to the A264/A24 and as a result of all the waste management businesses/the brickworks. The emissions which will be released from this development, although small, are still something to consider very carefully as I am not of a view that we have a sense of the overall impacts of prolonged exposure to low levels of some pollutants. I am not convinced that WSCC can guarantee there is NO long-term impact on human or animal health from burning waste. The studies undertaken have found it hard to conclusively state a position one way or the other, and the long-term impact is largely unknown. I for one, would like to see the outcome from the Public Health for England studies which should be published this year. I also note that an expert from UKWIN believe that the air quality assessments show an underestimation and also a flawed carbon assessment which suggests that landfilling would be more environmentally friendly than the incinerator proposed. This concerns me greatly.
7. **I also worry about the prospect of a fire at such a plant and its proximity to the MBT, landfill and the areas of woodland.** There will need to be movement in and out of flammable chemicals or hazardous/ contaminated material from site, which adds to the risks/ health hazards if a fire were to occur. **In conjunction with this, the prospect of a lorry accident on Langhurst Wood Road or the surrounding roads of Horsham fills me with dread, especially when some of these loads will contain the hazardous or flammable or contaminated material for substantial distances.**
8. **The 3-year construction period will be unbearable. The noise, traffic, parking problems, dirt, dust for 5 days of the week for a prolonged period of time will feel overwhelming and highly intrusive.** Add this to any impact from the North Horsham development, and it will lead to a huge reduction of privacy and quality of life for us. After working, I just want to come home to rest and enjoy the quiet rural area. If the construction is permitted for 3 years, and for long extended times (7-7 during the week and all-day Saturday), there will be a loss of that quality of home life we should be able to enjoy and demand by right.
9. **I also object on environmental grounds.** I do not think it is sustainable to drive waste long distances to a single site (unless is it specialized in some way; this is not). Any waste facilities should be appropriate for the capacity needed and as close to the source as possible. I also think sustainable transport should be used; diesel run HGVs are not the right answer and are a significant issue for air quality, they contribute to smog formation and greenhouse gases. Incinerators do release carbon dioxide, toxins and other greenhouse gases which we should

try and avoid as much as possible. The UK should take note of the European countries that have heavily invested in incinerators such as Denmark, and now facing a huge problem with meeting carbon neutral status in the coming years. The biggest issue for them is more the cultural change needed as waste has not been discouraged or reduced. WSCC should be urged not to be thinking incineration is the silver bullet to address the waste problems of the County and societal habits.

**10. I am of the view that the development does not meet key planning policies; namely:**

- HDC Planning Framework (2015) under its Strategic policy 1 & 2; policy 24, 25,26, 30, 32, 33, 34 40 and 41. Also 11,12,13, 15 and policy W21 of the WSCC Waste Local Plan (2014).
- The Planning Practice Guidance states at paragraph 47 – “The waste planning authority should not assume that because a particular area has hosted, or hosts, waste disposal facilities, that it is appropriate to add to these or extend their life. It is important to consider the cumulative effect of previous waste disposal facilities on a community’s wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local communities affected by previous waste disposal decisions will help in these considerations.”
- I am firmly of the view that Brookhurst Wood needs to be reviewed in light of the impact of North Horsham before such a development such as this is considered. The combined and cumulative impact of a landfill (whether operating or in restoration phase), the MBT, and this incinerator is not insignificant in conjunction with their associated traffic. Now that North Horsham has been approved, WSCC will, if it approves such a development, expose a greater number of people to the health and social impacts of this intensive waste site(s) which is just indefensible.

I also wish to comment on the social responsibilities of those operating waste processing businesses within the Langhurst Wood Road area- one of which is Britaniacrest. The residents have been raising issues for swift resolution with the various parties concerned and are being largely ignored. Since moving to the area, commercial derived litter, which spoils our environment in which we live, has failed to be addressed on an ongoing basis and ownership is always questioned. Odours remain a point of contention, where again denial from the operators is their overall position. The impacts of the traffic issues again are largely unaddressed; a recent request to reduce the speed limit of Langhurst Wood Road declined; less than 30% increases in HGV movements are

just waived through despite the HGVs movements close to 700 per day on a small rural road. Permitting another waste business into this area is just going to add to the woes experienced by the growing number of local residents who wish to continue to enjoy and protect the rural environment of Horsham and make it their home.

My last and final point is more about what has changed since the last application. Of most note is the concern being raised in the House of Commons in late 2017 about whether the UK is falling into the same trap as Europe with the building of too much incinerator capacity. Care must be taken when approving such facilities because of the long term/ permanent nature of these and the inability to reduce their capacity. Once such a plant is built and switched on, there is only the option of switching it off. With this being a privately-owned plant, this won't be switched off, but rather waste will come from further afield. The so called environmental benefits become eroded with such an unsustainable transportation approach. The second aspect is the view of the impact on the environment of diesel engines. This business will be wholly reliant on HGV vehicles travelling in some cases significant distances to bring waste to such a plant. My last point is more about the recent changes in Government policy on plastics. It is clear to see that culturally, there is an appetite to do more to protect the environment in terms of waste management and to act more sustainably. I am not convinced incineration is either environmentally friendly nor sustainable in its current operating model.