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To: PL Planning Applications
Subject: WSCC/015/18/NH

Planning Application: WSCC/015/18/NH

Objection to the Proposed Facility at the Brockhurst Wood Site in North Horsham (Wealdon Brickworks).

Please accept this this statement as my objection, in the strongest terms, to the proposed development outlined above. My reasons for objecting are many fold and a summary is outlined below.

Aesthetic, Scale and Visual Impact

While the height of the building has been reduced since the previous application, it is still the same height as a 12 storey building, with a 95m chimney; this will still dominate the largely rural surrounding areas, characterised with scattered, smaller scale developments and light industrial buildings. This incinerator will be over twice the height of existing buildings on the site and substantially longer. While there has been some effort to improve the overall aesthetic of the building and use a superior colour palette, the architecture is still industrial powder or epoxy coated cladding panels on a vast scale. It will be ugly simply due to its scale. It will be a visual eyesore and a blight on the countryside. Since the previous application, the land north of Horsham has been approved which radically alters the nature of the surrounding site and this has been considered in only the most cursory manner. On these grounds alone facility should be rejected as the initial waste plan could not foresee the change in development of the surrounding land. Suggestions that it follows the light industrial nature of the site that already exists, ignore the fact that very little of the existing buildings can actually be seen.

The building will be seen from many areas around Horsham and, it is clear from the ZTV, that it will be visible from the South Downs. I also note that the building and the chimney will have to be lit for both aircraft and general use. This will ensure that the visual impact of this incinerator is further increased as well as greatly adding to light pollution level at night – yet another loss of amenity for those who are local. Indeed, the light will act as a “halo” focal point to draw the eye in, and accentuate the profound ugliness of this building.

The incinerator will dominate views from the A24 and A264, being clearly visible all the way from Horsham to Kingsfold and beyond while commuting on these roads. For many people, this is not a quick secondary view while passing, as many road users will spend considerable time commuting this distance every day. The loss of visual amenity should be more thoroughly considered by the developer – this site is not suitable.

Where visual impact is mitigated, it is by vegetation only; should this be removed or suffer from disease, then there will be an exponential increase in the visibility of the incinerator. As most of this vegetation is deciduous in nature, screening is somewhat reduced for 50% of year.

Noise

The Noise reduction seems to be based around the equipment now being used to that previously chosen (one wonders why this option was not chosen first time?) It is difficult for a lay person to understand whether this noise will be reduce compared to the previous proposal or not. Certainly enough doubt was cast on the report last time around to make me treat any detail considered in this report with a great deal of scepticism. One assumes that the thin 95m chimney will have to be cable stayed in some manner which poses two unanswered questions – where will the tie down point be and can they fit it on the site? There is also no mention of high pitched whine that will occur when wind blows around these cables in the noise modelling. This data would seem flawed.

The traffic study uses data that is woefully out of date and relies on future modelling to predict traffic levels to remove the need for a further study. These predictions are incorrect – the study only had a predicted model for HGV movements for the MBT (not in existence at the time of the survey). Traffic already exceeds the levels suggested (collected data from all HGV movements for all parties on the Brockhurst wood site and Broadlands industrial park demonstrate this). Should planning for this building go ahead, traffic will increase because previous planning applications have granted increases in traffic movements to and from this site. If the incinerator is built, I see no

reason why Britania Crest will not continue to increase this number through such a mechanism as they have done in the past. This will be entirely unacceptable.

The Environmental Argument

I would question the green credentials of such a build; no guarantee can currently be made that incinerator flue gases, and the heavy metals contained within, are not a measurable risk to public health. The Public Health for England study looking in to this exact problem, is evidence of this uncertainty. I would remind all authorities that they have to duty of due diligence to ensure that they can guarantee public health as they are liable if this is found wanting at a later date. The suggestion by the report for the incinerator appears to be that because Horsham was already healthy the incinerator would make no difference – this argument appears specious.

The HGV traffic will no longer be local waste, this is commercial waste from the South East and, looking at Britania Crest's previous planning applications, it is likely that the majority of this waste will have nothing to do with Horsham. It will be sourced from Kent, Crawley and Hampshire and this will mean longer journeys from further afield with all the associated pollutants from large diesel engines. This impact has not been modelled thoroughly. One also wonders about the political expediency of placing an incinerator so close the proposed site of 2500 new homes and, potentially, a new primary school. The view of the developer is to ignore this.

While, the site may be ear marked for waste management – this does not mean an incinerator, indeed, the proposed incinerator is ranked number 4 out of 5 on WSCC own waste plan. I also object to the principle that Horsham should deal with more than its fair share of waste. This of course, assumes the incinerator can meet the efficiencies to be considered an R1 facility. The vast majority cannot achieve and are then D10 facilities. As such, many consider them worse than landfill.

The idea that an incinerator is part of the circular economy is flawed. This facility will be a full stop in any circular economy as materials are not recycled but burned. The very high calorie materials suitable for incineration to develop energy, are the very same materials most suitable for recycling

The Proposed incinerator, completely ignores options around gasification (a more innovative and probably smaller building) based entirely on likely profit – there will be no moral conscience behind this build as it will be funded entirely by multi nationals who will have no care for the concerns of Horsham when they will not even be based in the same county.