

From: [Simon Mortimer](#)  
To: [PL Planning Applications](#)  
Subject: WSCC/015/18/NH  
Date: 21 March 2018 16:31:43

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Dear Mr Dumbrell

Following the announcement of the Public Consultation period for the above referenced application, I would like to register my objections specific to the proposals as follows:

**Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD**

**Proposal Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure**

**1 Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessively large and the structure and chimney very high and will have a major impact on Horsham and the surrounding villages as well as the Surrey Hills area of outstanding natural beauty.

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

The scale of this plant is seeking waste from well outside of the local area and will encourage commercial waste being transferred over great distances to feed a very large incinerator, contrary to all current environmental policies on excessive transport movements and therefore in contravention of the policy. With a main railway line running right beside the site that used to serve it in a past usage, why is this not being utilised for the main transfer in of the bulk of the waste? Surely in these days of levels air pollution and traffic congestion this is the one thing that just might make this viable to all. There is plenty of spare capacity on this railway line for this, which if left little used could still be earmarked for closure with the resultant loss of passenger services to Horsham.

**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 in fact it will detract and blight it being visible from over 15kms away and in designated areas of Area of Outstanding Natural Beauty. There is also the pollution from the emissions including lead, mercury, dioxins, the increase in road traffic emissions and the impact it will have on business travel in terms of traffic delays and the detrimental impact on the Horsham district 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 will have a detrimental impact on Horsham and all the 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.

In the Britaniacrest application at 3.6.9 it states 'combustion of waste in the thermal treatment facility produces emissions of 51,000 tCO<sub>2</sub> equivalent per annum' This is some 1,275,000 tCO<sub>2</sub> during its expected operational period! Is this concentrated level of poisons and greenhouse gasses emitted into a rural area an 'acceptable impact on public health'? Surely we should be learning the lessons from pollution levels now seen in China and the Far East? These proposals will also require aviation lighting creating light pollution for the area as well as having a night-time noise impact on neighbouring communities.

## **2 Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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!

## **3 Noise intrusion**

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three



locations. This would seem a significant increase in noise that local residents would have to tolerate.

#### **4 The Environmental Arguments**

Britaniacrest suggest that incineration is better than landfill and give the analysis for that.

What is not answered is the specifics for the location they wish to put it in i.e. Horsham and

the surrounding rural areas. It also omits to detail the totality of greenhouses gases, dioxins,

heavy metals etc. for the area of Langhurst Wood Road, A264, A24, A29, and beyond, considering that there are brickworks and landfill facilities which currently already burn off methane gases, a mechanical & biological treatment plant and other distribution businesses on the site that attract high numbers of vehicles movements.

#### **Proposed Energy Generation Facility**

There is clearly a worldwide problem with waste disposal but turning one problem into another is not the way to go as can clearly be seen in cities such as Beijing and Mumbai and many others. Air pollution levels are out of control in the UK already without any radical plans so far developed to properly address them. Although there is undoubtedly growing demand for power consumption, our area has no immediate problems with supply, I know my final years were dealing with capacity at UK Power Networks our local power distribution network operator connected to the National Grid. There already exists in the UK an unlimited source of clean free energy that does not rely on wind, sunshine or even waves and that is tidal power. This currently unexploited technology is the cleanest and most unobtrusive power generation facility with little or no visible infrastructure and is available 24/7 unless the moon stops going around us and should be considered before facilities such as the above contribute to poisoning us, our children and our whole future.

My apologies, I was unable to submit even this modestly sized objection online due to strict limits imposed on content volume which have been reduced again, somewhat incompatible with the need to respond effectively to such a complex proposal.

Kind regards

Simon Mortimer  
11 Carylls Cottages  
Faygate Lane  
Horsham  
RH12 4SQ

Rose Cottage  
8 Station Road  
Wanham.

West Ox

RH12 3SR.

22nd March, '18

FOR THE ATTENTION OF SAM DUMBELL,  
PLANNING OFFICER

Dear Sir,

Ask yourselves at the  
Planning Department - would you  
like a Recycling, Recovery &  
Renewable Energy facility &  
Ancillary Infrastructure so close  
to your private property? Bearing  
in mind the fumes & smells that  
come around with the existing one.

We have seen the new  
design of the building, not a lot  
smaller than the first & the  
chimney is much the same height.

The residents around the  
area have paid a lot of money

for their properties which no doubt will affect the price should they wish to sell. Would there be any compensation for us here?

The traffic generation will increase + affect the safety all around the area.

Most of the comments & issues made in your letter will come into effect.

our family has lived in one of the station cottages for over 65 years & the beauty of the surrounding area to which we live is outstanding. It will be such devastation to us all that live here if the planning should go ahead.

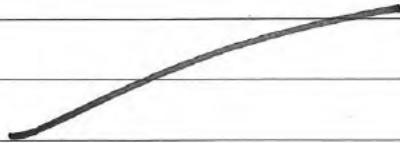
There has been five members of the family that have worked for the Brickworks & my husband clocked up 50 years service, mostly of which was spent in the Quarry.

Please be kind enough to take

3

my comments on board + give me  
the courtesy of a reply.

Thank you.



10 Richmond Road  
Horsham  
West Sussex RH12 2EG

23<sup>rd</sup> March 2018

County Planning  
West Sussex County Council  
County Hall  
Chichester  
West Sussex  
PO19 1RH

Dear Sirs

**Application No. WSCC/015/18/NH**  
**Applicant Britaniacrest Recycling Limited**

**I am writing to strongly object to the giant Incinerator proposed by the above company.**

**This will be near the new massive housing development on the north Horsham by pass so fantastic for young families with children wanting them to avoid pollution.**

**Why increase traffic in this area which is almost always busy and access roads to Horsham in and out each morning to the by-pass are always backed up with huge queues. In fact to get to Crawley (which I used to do when I worked there some years ago) meant I had to get onto the by-pass before 8.15 to enable me to get to Crawley roughly what should be a 10 or 15 minute drive took me at least 45 minutes. I imagine it is even worse now and my experience of trying to get to East Surrey Hospital is allowing at least 1 ½ hours. So traffic and huge lorries using this road is crazy.**

**Also why put this monstrosity on the edge of Horsham? It will be visible all over Horsham and I'm sure that whatever is coming out of this chimney will not be fresh air. It is already appalling that the landfill in Langhurst has been allowed to grow and cause smells all over Horsham. It would make a good ski run. I can clearly remember when carcasses from a foot and mouth area were brought to this mountain. So what will we be getting to burn in this incinerator?**

**It is in the wrong place and yet another real disaster in Planning for Horsham.**

**Yours faithfully**


**A E Holmes Mrs.)**

Mr T Wood  
Mrs J. Wood

The Garden Lodge  
RH12  
4TW.

We do not have a computer!

Re:- application no. WSCC/015/18/NH.

We object to the proposal  
on any dust, odour or fumes  
which must escape into the air.  
The work which cannot be  
conclusive to this rural area.  
and mostly on the heavy  
vehicle traffic on our already  
busy roads, which show signs  
of damage and potholes;  
without any further congestion.  
Yours faithfully 

45 Rookwood Park  
Horsham  
W Sussex  
RH12 1UB

29 March 2018

Strategic Planning Department  
West Sussex County Council  
County Hall  
Chichester  
West Sussex  
PO19 1RH

Dear Sir:

**Re: Objection to WSCC/015/18/NH – Proposed Incinerator No.4, Horsham**

I would like to inform you of my strong opposition to your planning proposal ref. WSCC/015/18/NH, the Incinerator no.4 in Horsham. Despite my personal objections it is in direct conflict with WSCC published planning guidelines. I object on the following grounds:

- **WSCC's published Waste Local Plan:** the guidelines are ignored as its size will impact on Horsham, surrounding villages as and Surrey areas of outstanding natural beauty in a significant way.
- **Strategic Objective 5** - the provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises: No; this plan will see commercial waste transferred over great distance. The imported waste being necessary to satisfy the needs of this huge incinerator (180KT pa).
- **Strategic Objective 11 and Policy W11** - Ensuring protection and enhancement of the natural and historic environment and resources, and the distinctiveness and character of the County: No; it will be visible from 15kms away in areas of Area of Outstanding Natural Beauty. In addition there are factors of pollution from the incinerator emissions (lead, mercury, dioxins) and increasing road traffic, particularly HGVs.
- **Policy W12 - High Quality Developments** - Proposals will be permitted provided that they are appropriate in scale, form, and design such that they integrate and enhance adjoining land and are appropriate the setting and views: No; this construction is large, ugly and out of place.
- **Policy W19: Public Health and Amenity** - Proposals for waste development will be permitted provided that: lighting, noise, dust, odours and other emissions will not impact on public health and amenity: No; the proposals will have a significant light pollution and night-time noise (6dB) impact on the neighbouring communities.

Finally, I would like to consider this local issue in the broader context: Government seeks a moratorium on incineration facilities because the UK has surplus capacity for burning waste, and incineration plants in the EU are being decommissioned because reduced

availability of suitable waste. Research increasingly indicates that incineration reduces recycling. WSCC should look to encourage the community to reduce reliance on our plastics and recycle more.

I would be grateful to receive your assurances that my concerns are being taken into consideration, and kept up to date on the status of this project.

Yours faithfully

Sarah Scott



**From:** [Nicky Newton](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to ref: WSCC/015/18/NH  
**Date:** 03 April 2018 12:21:22

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Hi there,

I am **STRONGLY** objecting to the above proposals for an incinerator to be built in Horsham for many reasons. Most important to me is point number 5. Just imagine if in a few years the number of health issues for the people of Horsham sharply increases...What if studies show that the pollution from industrial waste incinerators has caused major health issues for people and children? Can you live with that? I am urging you to please reconsider. We don't need an industrial incinerator here. The NHS is bursting at the seams and people deserve a right to live a healthy life without breathing in toxic fumes. Please, please, please look at the research done into environmental toxins. I will be happy to provide papers and references to information if required.

## **1. Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

## **2 Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## **3 Noise intrusion**

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

## **4 The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant?

NB: An in-depth health study has been commissioned by Public For England which is due Spring 2017.

## **5. Environmental Toxins**

Excerpt from Dr Greg Emerson 12 August 2009 <http://www.drgregemerson.com/fact-file/environmental-toxins>

Environmental toxins are now pervasive in our food, water and air. About 70,000 new synthetic chemicals were introduced into our environment during the 20th century. Of these, 3000 are deliberately added to food and 700 have been identified in drinking water. We are exposed to industrial waste, pesticides and toxic chemicals on a daily basis. 80% of these chemicals have never been tested for their effects on human health. Chronic environmental toxin contamination results in a multitude of clinical syndromes and decreases our ability to fight cancer and infections. Exposure begins even before birth with one study finding 287 chemicals and toxic metals detected in 10 babies. 217 of them were brain toxins and 208 had the potential to cause birth defects. Another study found that low birth weight is associated with high cord blood levels of arsenic, mercury, lead, solvents and pesticides.

Exposure occurs because:

- All commercially grown foods contain pesticides.
- Animals are treated with antibiotics and pesticides and also feed on foods treated with pesticides. Many of these chemicals interfere with thyroid and other endocrine function.
- Fruit and vegetables have fungicides and fumigants sprayed on them.
- Chemicals that make plastic flexible are called phthalates. They leak out of plastic and contaminate food and water.
- Chlorinated city water contains 100 to 10,000 more chemicals than natural spring water. These can include mercury, arsenic, PCB's and dioxins.
- **Air pollution is ubiquitous and winds can carry chemicals from other parts of the world.**
- Most of these chemicals are stored in our fat and can remain in our bodies for years or decades. Foetal exposure is a particular problem because the organs they use for detoxification are nonfunctional during developmental stages.

Over 1 billion tonnes of pesticides are used in the United States every year. How about in Australia? A report on pesticide use in Australia done by the Australian Academy of Technological Sciences and Engineering in 2002 states that "determining specific data about recent and current trends in the use of pesticides in Australia has proven difficult. There is a dearth of detailed information about the extent of use of chemicals, expressed either in terms of the active ingredient or in terms of the formulated products." They state that the principal forms of pesticides used in Australia can be categorised into insecticides, herbicides, fungicides and growth promoters. Of the main pesticides, there appears to be about 20,000 tonnes used per annum. The main insecticides are organophosphate and carbamates of which there are about 8000 tonnes used per year. There are about 3000 tonnes of fungicides used per year and over 500 tonnes of plant growth regulators.

Most environmental toxins are fat soluble and can consequently cause nerve and brain disorders, cancer, autoimmunity, food sensitivities, fatigue, depression, recurrent and infections. Toxins increase acidity and acidity makes the toxins more reactive. The body has a variety of ways of responding to the toxins which include attaching it to a fat/protein, storing it and converting it to a water soluble substance by biotransformation in the liver and then excreting it. Part of the biotransformation process is the movement of the toxin to the site of biotransformation by lipid molecules. **A rise in these lipid**

**molecules (e.g. cholesterol, HDL, LDL and triglyceride) may actually represent the body handling a toxin.** Consequences of this process may be:

- An increased risk of cardiovascular disease from the elevated lipids.
- Individuals with very low levels of cholesterol may not be able to protect themselves against environmental toxins
- Aggressive lowering of lipids without addressing the underlying environmental toxin may precipitate symptoms of toxicity (which may explain some of the side effects of statin drugs).

Common sources of chemical pollution include:

1. Formaldehyde.
2. Natural gas.
3. Pesticides (most of which are neurotoxins).
4. Volatile solvents.
5. Rubber and plastics.
6. Combustion products and fuels.
7. Paints and varnishes.

Typical examples:

### **Polychlorinated Biphenyls (PCBs)**

PCBs were used as nonflammable coolant fluids in capacitors and electrical transformers. In the past they have also been used as lubricants, hydraulic fluids, inks, paints, varnishes and pesticides. PCBs have been shown to inhibit thyroid function and production has been banned. However existing PCBs have continued to leach into the environment and continue to accumulate in the fatty tissues of living creatures. Most human exposure comes from that derived from other animals near the top of the food chain such as fish, meat or dairy products. Without further exposure, it takes several decades to reduce your body load by half (the half life).

Studies on monkeys exposed to PCBs in the womb and breast milk showed they suffered impaired memory, learning and motor skills. Human occupational exposure resulted in goiters and abnormalities of thyroid hormone levels.

### **Dioxins**

Primary sources of dioxins are in incineration of municipal or hospital waste and sewage sludge that contains chlorine. They are also formed during the production of chlorine containing chemicals such as pesticides, PVC, plastics and from diesel engine exhaust.

Dioxins are distributed throughout our environment and concentration increases higher in the food chain. Main exposure to dioxins and outcomes from meat, dairy and fish. With no further exposure, it takes seven years to reduce your body burden by half.

Dioxins have been shown to cause cancer, particularly Hodgkin's disease, non Hodgkin's lymphoma and soft tissue sarcomas. They have also been shown to disrupt thyroid, testosterone and oestrogen function in laboratory animals. Men exposed to an accidental spill in 1982 developed lower sperm counts and reduced immune function.

## **DDT**

DDT is the most powerful insecticide ever discovered. Although its use in the US was stopped in 1972 after animal experiments showed it caused cancer, it is still used extensively in Third World countries to control mosquitoes. The half-life in the environment is 57 years and five years in our bodies.

DDT has also been shown to interfere with thyroid hormones, block testosterone receptors and interfere with oestrogen hormones.

## **Phthalates**

About one billion pounds of phthalates are produced per year to soften plastics. Half the mass of a soft plastic container can be phthalates. They leach into drinking water, soft drinks, oils, and food stored in plastic. They are also used in hair spray, dyes, cosmetics, breast implants, adhesives and lubricants.

They have been found to interfere with thyroid hormone levels and adversely affect testosterone function. Babies with high levels are more likely to be born prematurely and men with high exposure have decreased sperm counts. The half life is a few days but exposure is continuous.

## **Petrochemicals**

Petrochemicals originate from fossil fuels such as petroleum, natural gas and coal. Petrochemicals can also be found in fabrics, building materials, household cleaners, formaldehydes, rubber and plastic. They can stimulate hypersensitivity reactions such as rashes and allergies.

## **Illnesses**

Research by Dr William Rea at the Environmental Health Centre of Dallas has shown that these environmental toxins are a common cause of environmental illnesses, hypothyroidism and chemical sensitivities. Chemical sensitivity is an adverse reaction to ambient levels of toxic chemicals contained in the environment. The reaction depends on the individual's susceptibility, the substance, organs involved, duration of exposure and underlying nutritional status. They have found that environmental toxins are particularly damaging to the immune system, nervous system and endocrine (hormonal) system. Hypothyroidism is common result of environmental poisoning and people with hypothyroidism are more susceptible to the damaging effects of environmental toxins.

With regards,  
Nicky Newton  
44 Sargent Way, Broadbridge Heath, West Sussex, RH12 3TS  
[REDACTED]

**From:** [john.park](#)  
**To:** [PL Planning Applications](#)  
**Subject:** objection to the council for Incinerator reference WSCC/015/18/NH  
**Date:** 02 April 2018 13:44:42


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I would like to object to the proposed Incinerators due to the negative health aspects of such facilities and the how this does not suit the UK policy of recycling where possible.

There have been many reports in the past of these types of Incinerators polluting more than they have specified at the time of the planning consent.

Here is a recent example where a new one was fined.

<https://www.irishtimes.com/news/crime-and-law/courts/district-court/poolbeg-incinerator-fined-for-breaking-environmental-licence-1.3440855>



### Poolbeg incinerator fined for breaking environmental licence

The operator of the Poolbeg incinerator has been fined €1,000 and ordered to pay €14,000 in costs after a "glitch" led to breaking its environmental protection licence during its first week. The power plant at Pigeon House Road, Poolbeg, Dublin 4,

[www.irishtimes.com](http://www.irishtimes.com)

Also a UK report entitled "The Health Effects of Waste Incinerators" by the British Society for Ecological Medicine was conducted in 2005 and then updated in 2008.  
[http://www.bsem.org.uk/uploads/IncineratorReport\\_v3.pdf](http://www.bsem.org.uk/uploads/IncineratorReport_v3.pdf).

This report states "... fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality (see section 3.1) and demonstrating that the danger is greater than previously realised. More data has also been released on the dangers to health of ultrafine particulates and about the risks of other pollutants released from incinerators (see section 3.4). With each publication, the hazards of incineration are becoming more obvious and more difficult to ignore" They go on to state that" ...Large studies have shown higher rates of adult and childhood cancer and birth defects around municipal waste incinerators: the results are consistent with the associations being causal. Several smaller epidemiological studies support this interpretation and suggest that the range of illnesses produced by incinerators may be much wider" The emissions from an incineration plant in comparison to a coal plant are significantly more harmful to the environment, the harmful effects of coal fired power

stations have been fundamental reason for their decline; why would the Environment Agency promote the use of a dirty technology that releases: Address Redacted 2 • 6 times more Lead. A well-known toxin that diminishes intelligence and – by lowering dopamine levels in the brain – may even be tied to increases in violent behaviour and cocaine addiction • 3 times more Nitrogen Oxide. A gas that primarily contributes to eye, nose, throat and lung irritation and respiratory problems like shortness of breath that can trigger asthma. • 2 times more Carbon Monoxide. A contributor to the formation of ground-level ozone pollution, aggravating asthma. • 70% more Sulphur Dioxide. A cause of acid rain – is also bad for lungs, with even short exposures to ambient levels causing “bronchial constriction and increased asthma symptoms. (<http://www.energyjustice.net/incineration/worsethancoal>) The increase in road traffic which will be primarily made up of large diesel powered vehicles will further exacerbate the air quality in the local area.

Furthermore, the hours of operation will increase the noise pollution and detract the local area from its rural setting.

25% of the material transported to the plant will remain as ash once incinerated.

How will this Incinerator emissions be monitored independently to ensure they operate within the strict limits set ?

Who will pay for for the constant monitoring?

How will the toxic ash be dealt with in ecologically an sound manner?

Regards

Jon

**From:** [Michael Bayston](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** Objection to planning Reference WSCC/015/18/NH  
**Date:** 31 March 2018 17:29:14

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Dear Sirs/Madams,

I email to object to the planning application for an industrial incinerator - planning ref WSCC/015/18/NH - on the following grounds (my name and address at base of email):

The size of the construction is excessively large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**It contravenes the following elements of the WSCC's Local Waste Plan:**

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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

**It will have a negative impact on local area**

- The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally 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.

**It will have a negative impact on local noise levels**

- 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 would seem a significant increase in noise that local residents would have to tolerate.

**It will be bad for the environment**

- Research increasingly indicates that incineration reduces recycling.
- 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.
- With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.
- Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant?

Best wishes,  
Michael Bayston  
52 Churchill Way, Horsham, RH12 3TZ

**From:** [Jo Prodger](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Application WSCC/015/18/NH - objection  
**Date:** 31 March 2018 08:50:11

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Dear sir/madam  
Re:

-

**Application Number:** WSCC/015/18/NH  
**Proposal:** Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure  
**Location:** Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD  
**Applicant:** Britaniacrest Recycling Ltd

I would like to raise my objections to this application for the following reasons;

#### Non-compliance with WSCC's Waste Local Plan

The scale of the proposed construction is still exceptionally large and intimidating. It will have an over-powering impact on the parish and the locality, and will be visible from an extensive area of West Sussex and Surrey. As such, it is at variance on a number of counts with the Waste Local Plan.

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant appears to be incompatible with the disposal of local waste and will attract material from a large area.

Strategic Objective 11: 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 enhance the natural environment.

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..... The proposals will have a dramatic adverse effect on the character of the area and hence it is unable to meet this policy.

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 proposals are clearly unable to meet this policy on the stated criteria.

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 require aviation lighting and have a night-time noise impact and hence the proposals are unable to meet this policy.

#### Visibility of the development

A development of this scale presents a highly visible and overpowering intrusion into the rural countryside. It is unacceptable that any industrial development in the rural countryside. The building and stack will be an unwelcome backdrop to views from many locations in the parish. The majority of Warnham village is a conservation area. Visual impacts of this dominance will degrade the value of the

conservation status.

The intrusion of the stack will be particularly intimidating at times when exhaust plumes are being emitted. It is not reasonable that any development at an unnecessarily large scale should have an adverse impact of any degree on the residents of the parish.

#### Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. These include Station Road which has been considered as a single location. Station Road has some 25 properties with an estimated 75 residents. It is unacceptable that these residents should experience a permanent change to their night-time noise level as a result of the development.

Health issues related to the incinerator have not been investigated and with a report due out this spring it seems unethical and immoral not to wait until this has been published to enable the full potential scope of the situation to be better understood and communicated to those affected by it. I have one child (soon to be 2) at Warnham primary school and we live on the periphery of north Horsham so I'm incredibly concerned about how this is going to affect our health and wellbeing.

Horsham and its surrounding villages and green belt is soon going to be changed beyond all recognition with all the developments taking place - it won't be the place we all chose to live in anymore, it won't have the character or the safety - and the amount of traffic, noise, pollution and risk to public health is simply unacceptable.

#### Conclusion

The development is of a scale totally out of proportion to its location and rural environment. In agreement with the objections laid out by Warnham Parish Council, as well as the unknown health implications it may have on those living in the vicinity of its reach, I feel this application should not be allowed to go ahead due to the hugely negative impact it will have in Horsham and surrounding areas.

Mrs Jo Prodger  
20 Downsview Road  
Horsham  
RH12 4PF

Sent from my iPhone

Sent from my iPhone

**From:** [T Peters](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Application Number: WSCC/015/18/NH - Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure - Objection.  
**Date:** 30 March 2018 17:48:03

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Dear Sirs

I wish to register my objection to the granting of planning permission for application Number: WSCC/015/18/NH, described as a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure.

My objection is based upon the following:

**Suitability of use for the area:**

- Proximity to residential areas of large population and the proposed North Horsham development. A slight shift in the prevailing wind direction will move the exhaust plume over these areas. This may be an acceptable downside if the waste being burnt was produced by local residents but this is mainly a facility for the processing of commercial and industrial waste.
- The negative visual impact of a large plant in a rural site and which will also be clearly seen from Warnham and neighbouring residential areas
- The site is close to the Warnham SSSI which is described as "one of the most important sites in this unit". As the local prevailing wind is south-westerly the ash deposits from the incinerator plume would likely fall on to this area providing contamination of the site. It is also conceivable that during north-easterly winds the plume will drift contaminants over the Warnham Nature Reserve.
- Incinerators undermine councils' recycling schemes by demanding long term waste delivery. This goes against your own policy as stated in the WSCC Waste and Recycling Service Plan 2017/2018 where you target yourselves to increase recycling rates. You cannot recycle something you have burnt.

**Layout/appearance/design of buildings:**

- The proposal includes a 95m, permanently-lit chimney stack with red marker lights which are permanently lit to warn aircraft of the structure. To put the height of the stack in context it is 2m higher than the Statue of Liberty and only 1m shorter than the Elizabeth Tower (home to Big Ben) at the Palace of Westminster. This cannot be acceptable in a rural area famed for its rolling hills and down-land fields.
- The main boiler building is proposed to be just under 36m tall. That is 10m taller than Buckingham Palace.

**Loss of light/outlook/privacy:**

- Given the above dimensions the outlook of the buildings and chimney will overlook nearby homes and businesses.
- Additionally the 95m chimney will be visible from most of North Horsham, Warnham and Faygate.

**Traffic generation/access/highway safety:**

The proposal is clearly designed to provide a facility to maximise a revenue stream for Britaniacrest Recycling Ltd. This will likely require the importation of commercial waste from other areas in order to “feed” the facility.

- Increased traffic moving waste and ash to and from the incinerator will be a big headache for local residents, with many additional Heavy Goods Vehicles having to use the narrow A24 and Langhurst Wood Road each day. It is reported that an average sized plant handling 200,000 tonnes of rubbish per annum will mean 13,000 lorry loads a year. ( I note the application proposes 230,000 tonnes per annum)
- These Heavy Goods Vehicles will produce significant amounts of CO<sub>2</sub> and NO<sub>x</sub> as they will invariably be diesel powered. The Council should be aware already from the recent studies of air quality in London of the impact of diesel emissions on public health.
- Road safety: The local roads are highly popular with walkers, cyclists and horse riders. Additional HGV vehicle volume will increase the risk of conflict between large HGV vehicles and vulnerable road user groups. This in turn will inevitably lead to 1) increased risk of death or serious injury to vulnerable road users 2) the likely need for the Council to have to put in place additional infrastructure to support these users or to allow access to the site for additional large vehicles (e.g. access roads, cycle paths or at the very least additional signage/traffic control measures) which will be a further unnecessary drain on resources.

#### **Impact on natural environment including animals and their habitat:**

*The Waste Strategy 2000 for England and Wales* - In response to the demands of the Landfill Directive, and other European directives on waste, the Government produced a National Waste Strategy in May 2000 which set out its views on the future for waste management in England and Wales. The Strategy requires that decisions on the type of waste management technique to use, including decisions on suitable sites for treatment and disposal, should be based on a local assessment of the Best Practicable Environmental Option (BPEO). This requires managers to take decisions which minimise damage to the environment as a whole, at an acceptable cost in the long and short term. It is based on three key considerations:

1) " the waste hierarchy places reduction as the most preferable option for managing waste. This is followed by re-use, then recovery through recycling, composting and energy recovery, and lastly disposal. It is important to note that the strategy states that **“incineration with energy recovery should not be considered before the opportunities for recycling and composting have been explored.”**

2) " the proximity principle requires waste to be disposed of as close to the place of production as possible. This avoids passing the environmental costs of waste management to communities which are not responsible for its generation. It also reduces the environmental costs of transporting waste.

3) " Self-sufficiency: waste should not be exported from the UK for disposal, and waste planning authorities and the waste management industry should aim, wherever practicable, for regional self-sufficiency in managing waste.

#### **Dust/odour/fumes:**

A UK report entitled “The Health Effects of Waste Incinerators” by the British Society for Ecological Medicine was conducted in 2005 and then updated in 2008.

[http://www.bsem.org.uk/uploads/IncineratorReport\\_v3.pdf](http://www.bsem.org.uk/uploads/IncineratorReport_v3.pdf).

- This report states “.... fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality (see section 3.1) and demonstrating that the danger is greater than previously realised. More data has also been released on the dangers to health of ultrafine particulates and about the risks of other pollutants released from incinerators (see section 3.4).
- With each publication, the hazards of incineration are becoming more obvious and more difficult to ignore” They go on to state that” ...Large studies have shown higher rates of adult and childhood cancer and birth defects around municipal waste incinerators: the results are consistent with the associations being causal. Several smaller epidemiological studies support this interpretation and suggest that the range of illnesses produced by incinerators may be much wider”
- The emissions from an incineration plant in comparison to a coal plant are significantly more harmful to the environment, the harmful effects of coal fired power stations have been fundamental reason for their decline; why would the Environment Agency promote the use of a dirty technology that releases:
  - 6 times more Lead. A well-known toxin that diminishes intelligence and – by lowering dopamine levels in the brain – may even be tied to increases in violent behaviour and cocaine addiction
  - 3 times more Nitrogen Oxide. A gas that primarily contributes to eye, nose, throat and lung irritation and respiratory problems like shortness of breath that can trigger asthma.
  - 2 times more Carbon Monoxide. A contributor to the formation of ground-level ozone pollution, aggravating asthma.
  - 70% more Sulphur Dioxide. A cause of acid rain – is also bad for lungs, with even short exposures to ambient levels causing “bronchial constriction and increased asthma symptoms.

#### **Noise/disturbance:**

- The construction phase of the facility will see construction of buildings, roads completion, drainage and infrastructural works completion. Subject to lead times for plant delivery, the duration of Phase 2 is estimated at approximately 23 months.” This will be nearly two years of significant noise, dust and additional construction vehicle traffic in the local area.
- Additional Heavy Goods Vehicle traffic volumes to provide fuel for the facility will create additional road noise and congestion on the small feeder roads and on the A24 and A264. The average HGV when passing at approximately 7 meters is 95-100db. That is the same as a hand-drill or slightly less than that maximum permitted for a discotheque/nightclub. There will be a significant number of residents in the affected area with homes that will be within 7m of a passing HGV traffic. There will be more once the proposed North Horsham development begins.
- The proposal states that the facility will operate 24 hours a day and 7 days a week except when maintenance is required.

#### **Effect on landscape or character of area:**

The Council will know full well that Horsham is a traditional market town well situated on the edge of the Sussex Weald. We are fortunate to be an area of significant beauty next to the major conurbation of Crawley and sandwiched between Brighton and London. There is no defence for building such a facility here.

We are lucky not to be an area of deprivation (the application documents themselves support this statement) so there isn't even a benefit to the local area in terms of significant numbers of new jobs or

income for the Council that could be used as a counter argument of the detrimental effects of incineration of waste in this part of West Sussex

I sincerely hope that the Council will look seriously at the negative impact that approving such an unnecessary scheme will create. The damage to the character of the local area and the health of its residents cannot be undone once it has occurred. Do the right thing and reject this application.

Yours sincerely  
Tim Peters MCIPS  
35 Billingshurst Road  
Horsham  
West Sussex  
RH12 3LJ

Acknowledgements:

[www.ukwin.org.uk](http://www.ukwin.org.uk)

Friends of the Earth – htwai.pdf

75 Primrose Copse,  
Horsham.  
West Sussex  
RH12 5PZ

3/4/18

Planning Dept  
West Sussex County Council,  
County Hall,  
Chichester, PO19 1RH

Dear Sirs,

No to industrial incinerator - Horsham

I wish to object in the strongest terms to  
the planning application for an industrial  
incinerator in Horsham - planning ref -  
WSCC/OIS/18/NH.

Whilst I appreciate the needs of a growing  
population - not to mention the new housing  
developments planned which we as residents  
will <sup>shortly</sup> have to contend with - the resulting

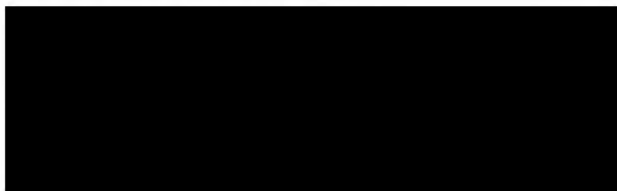


2-

once all the new houses are built,  
we should continue with recycling rather  
than burning as this is not environmentally  
friendly.

Please consider all the residents  
views & I hope you will reconsider  
these plans, as Horsham is not the  
right area in which to site such a project.

Yours faithfully,



*[A long, thin, curved line, likely a signature or a decorative flourish.]*

Ref. WSCC/015/18/NH

8 Fivens Place  
Horsham

W. Sussex

RH12 5AS

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester PO19 1RH.

Dear Sir/Madame,

With reference to the above application for planning permission for the installation of an incinerator by Britanniacrest we (my wife and I) both strongly object to this proposal. The grounds for our objections are:

- a) Increased levels of atmospheric pollution causing increased levels of chest infections, particularly asthma from which my wife suffers.
- b) The new residential developments in north Horsham will be seriously affected by the fumes and smoke from the proposed incinerator.
- c) It will have a negative affect on

the recycling, which Horsham Council  
is anxious to encourage.

We believe that it is the duty  
of Horsham Council to reject the  
application which is clearly against  
the interests of all the present and  
future residents who live in Horsham.

Yours faithfully,

A large black rectangular box redacting the signature of the sender.

S. Dumbrell  
County Planning  
County Hall  
W.Sussex  
PO19 1RH

11 Crossway  
Lewes  
E.Sussex  
BN7 1NE

3<sup>rd</sup> April 2018

Dear Sir/Madam

Re: Application no: WSCC/015/18/NH. Waste Application.

The below letter I tried to send on the web site, it was not clear if it had been sent, So I am posting this copy.

I am writing in the strongest terms to lodge my objections to the planning application WSCC/015/18/NH. I am a joint owner of Pondtail Farm, Langhurstwood Road, Horsham, RH12 4TL.

My family have owned Pondtail Farm since the 1940's, it is situated on a narrow country road that is Langhurstwood Road, over the years the quantity, speed and size of the vehicles using it has increased greatly. The greatest concern to both I and our tenants both of the house and the grazing land has been the number of large lorries driving at quite a speed that already use the road.

At the present the traffic is such a problem that the tenants of the fields try to move their horses and sheep over weekends when the number of lorries is reduced as trying to move them on a week day is considered to dangerous.

I myself have seen the speed these lorries travel and feel it is sadly only a matter of time before there is a serious accident with stock or the pedestrians who use the road and live in the houses along Langhurstwood Road as there is no pavement for most of it. The tight bend above Mercer Road is of particular concern due to the lack of visibility for on coming traffic and pedestrians on the road.

I noted the above objection in my earlier letter dated 10/1/2017 to an earlier application no: WSCC/062/16H.

I have had a look at the Transport scoping report and I have to say I am now even more concerned at the sheer number of HGV traffic movements. So from Monday to Friday 07.00 to 18.30 there could be up to 246 loads of waste being delivered to and from site. On a Saturday it could be up to a 120 from 7.00am to 12.00 with a little relief of only 8 being allowed

from 16.30 to 18.00.

But not I note on Sundays, Bank holidays and public holidays. What a huge relief in noise and potential traffic danger that will be to the residents and users of this section of Langhurstwood Road.

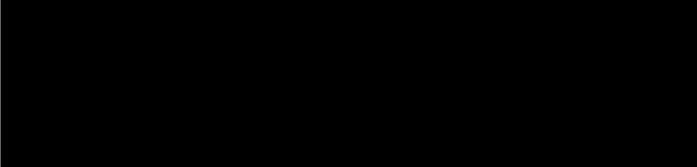
I see no provision in the application to up grade this country road to cope with this amount of traffic and it's size. I see no pavements or traffic calming to reduce the speed or increase the visibility on the blind corner. I see nothing in this application that has any consideration of it's effect on the residents who live and work around this new waste facility.

Obviously if planning is granted for this scheme then the sheer number of large commercial vehicles using the road will increase massively as outline above.

I feel Langhurstwood Road in it's present form is wholly unsuitable to cope with this type and amount of new traffic generated by this waste plant, from it's site at the old Wealden Brick works to the junction of the A264/Horsham northern bypass.

For this reason I urge the planners to reject this planning application on the grounds of traffic safety and the safety of all those who live and work along this stretch of Langhurstwood Road.

Yours Faithfully,



C.E.Blake-Dyke

**Nymans Close  
Horsham  
West Sussex  
RH12 5JR**

The County Planner  
County Planning Department  
West Sussex County Council  
County Hall  
Chichester  
West Sussex  
PO19 1RH

2 April 2018

Dear Sir

Ref: WSCC/015/18NH

We would like to register our objection to the building of an incinerator in North Horsham.

One of our concerns is that currently there is a lot of traffic using the A264 and A24 leading to the Great Daux Roundabout then onto Faygate and the same coming the other direction. Once the building commences on the new estate north of the A264, the volume of traffic will only increase. If an assumption is made that each house will have at least one car, then add that to the increase of lorries using the incinerator site on this stretch of road and the build up of traffic will assume ridiculous proportions. Our local roads are deteriorating at a faster rate than the Council can repair them – potholes are one cause of concern. Large lorries thundering over already poor surfaces will only lead to even worse driving conditions.

While we are against the forthcoming building in North Horsham, surely the occupants of the new houses are not going to want the building of the incinerator so close to their homes? With the increase in lorry traffic and additional smells, this would not be someone's dream home.

The building of this incinerator will only increase CO<sub>2</sub> emissions which will damage the environment. Surely there must be a less populated site that would be more suitable? Horsham has seen a large amount of building over the last ten years. It is now time to say enough is enough.

Yours faithfully



Mr and Mrs Curtis

45 Rookwood Park  
Horsham  
W Sussex  
RH12 1UB

29 March 2018

Strategic Planning Department  
West Sussex County Council  
County Hall  
Chichester  
West Sussex  
PO19 1RH

Dear Sir:

**Re: Objection to WSCC/015/18/NH – Proposed Incinerator No.4, Horsham**

I would like to inform you of my strong opposition to your planning proposal ref. WSCC/015/18/NH, the Incinerator no.4 in Horsham. Despite my personal objections it is in direct conflict with WSCC published planning guidelines. I object on the following grounds:

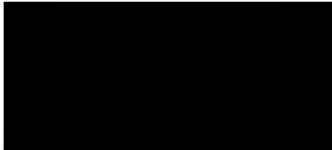
- **WSCC's published Waste Local Plan:** the guidelines are ignored as its size will impact on Horsham, surrounding villages as and Surrey areas of outstanding natural beauty in a significant way.
- **Strategic Objective 5** - the provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises: No; this plan will see commercial waste transferred over great distance. The imported waste being necessary to satisfy the needs of this huge incinerator (180KT pa).
- **Strategic Objective 11 and Policy W11** - Ensuring protection and enhancement of the natural and historic environment and resources, and the distinctiveness and character of the County: No; it will be visible from 15kms away in areas of Area of Outstanding Natural Beauty. In addition there are factors of pollution from the incinerator emissions (lead, mercury, dioxins) and increasing road traffic, particularly HGVs.
- **Policy W12 - High Quality Developments** - Proposals will be permitted provided that they are appropriate in scale, form, and design such that they integrate and enhance adjoining land and are appropriate the setting and views: No; this construction is large, ugly and out of place.
- **Policy W19: Public Health and Amenity** - Proposals for waste development will be permitted provided that: lighting, noise, dust, odours and other emissions will not impact on public health and amenity: No; the proposals will have a significant light pollution and night-time noise (6dB) impact on the neighbouring communities.

Finally, I would like to consider this local issue in the broader context: Government seeks a moratorium on incineration facilities because the UK has surplus capacity for burning waste, and incineration plants in the EU are being decommissioned because reduced

availability of suitable waste. Research increasingly indicates that incineration reduces recycling. WSCC should look to encourage the community to reduce reliance on our plastics and recycle more.

I would be grateful to receive your assurances that my concerns are being taken into consideration, and kept up to date on the status of this project.

Yours faithfully

A solid black rectangular box used to redact the signature of Sarah Scott.

Sarah Scott



**104 Heath Way, Horsham, West Sussex, RH12 5XS**

County Planning  
West Sussex County Council  
County Hall  
Chichester  
PO19 1RH.

3 April 2018

Dear Sirs,

**Planning Application Ref: WSCC/015/18/NH**  
**Recycling, Recovery & Renewable Energy Facility & Ancillary Infrastructure**

I am writing to formally object to the above application by Britaniacrest to install a massive incinerator on the waste transfer site at the former Wealden Brickworks, Langhurstwood Road, Horsham. As I understand it this will not be for our waste but will be industrial and commercial waste which will be transported by road from all over the south of England.

This facility will not comply with the WSCC Waste Local Plan. The size of the proposed building is excessive – 49m high, 18 storeys with a 95m high exhaust stack which will put out a visible emission plume up to 0.5km above the ground and will have a major impact on Horsham and its surrounding villages and will be operating 24 hours a day. Although the building and stack will be an eyesore, the visual impact of the building is not the prime issue. Even if screened by trees, at night people will be subjected to a 6dB noise increase which is totally unacceptable and because of the height of the stack it will require aviation lighting causing serious night light pollution.

This facility will be very close to the “North of Horsham” development site where 2,750 new homes and three new schools are scheduled to be built. Despite any assurances that Britaniacrest might give, emissions from this incinerator will mean that no-one in their right mind would want to live in this housing development and the fumes would put everyone, particularly children and the elderly, at risk from serious health issues. Deadly toxins could spread far and wide and would be harmful to wildlife, hedgerows and farm animals as well. It would also mean that farmland nearby could not be cultivated or used for grazing livestock.

There is also the question of excessive traffic congestion. Masses of heavy lorries would be using our roads adding to more severe congestion over and above that caused by the impact of the many vast housing developments already built and proposed. The roads will not be able to cope.

I therefore reiterate my objection to the Application and wholly support the call for “No Incinerator for Horsham”.

Yours faithfully,

A black rectangular box redacting the signature of Andrea Saxton.

Andrea Saxton (Miss)



6.4.18

## COMMENTS & PROTEST AGAINST W & C C / O I S / 18 / N H

Dear Sirs

I cannot protest strongly enough regarding the above proposal, and cannot believe it is even being considered for this area, especially as it has been "rejected" elsewhere!

The Visual Impact is unacceptable but my main concern is emissions / noise.

What protection do your residents have against noise / dust / odours - what will the effect be on the health & wellbeing of the people you are supposed to be serving?

It will also be close to our local nature reserve and what of the

traffic - our roads are congested  
at the present level.

We have been "forced" to accept additional  
housing - who is going to want to buy  
a house in an area with pollution  
HAS NO ONE ANY SENSE!

Yours Faithfully

A solid black rectangular box used to redact the signature of Mrs HJ Harding.

MRS HJ HARDING.

County Planning,  
W.S.C.C.,  
County Hall,  
Chichester, PO19 1RH.

Mr & Mrs S Busby  
Bybrook  
Friday Street  
Rusper  
HORSHAM  
RH12 4QA



2nd April, 2018

Dear Sirs,

Re: Horsham Incinerator Plan

Ref: WSCC/015/18/NH.

Last year plans for a proposed incinerator near us in Rusper were rejected. We hear Britanniaeast has submitted new plans which we write to comment on and hope will again be rejected!

We centre our concerns on the likely transportation of waste across county borders, polluting our air with  $\text{CO}_2$  and NOx emissions. Incineration increases  $\text{CO}_2$  levels, damaging our health and the rural environment.

We believe too many incinerator plants available may in fact correlate with decreased recycling by individuals. MPs are now aware of this.

Also, the existing chimney is 28m tall, the proposed incinerator building will be 36m tall with a 95m chimney. All of this

is unacceptable in a largely rural area N. of the A264.

Additionally, the World Health Organization advises that areas near a waste incinerator should not be populated yet this unwanted development will be adjacent to the N. Horsham Development with the plume heading over nearby housing and countryside.

We sincerely hope you will listen to the many voices raising concern which are in united opposition to a plan which would (if allowed) deeply effect the life, health, well-being and safety of human life and animals.

The application by Britannia Crest to build an incinerator must be refused for the above reasons.

Yours sincerely,

[Redacted Signature]  
(local residents)



Little Timbers  
22 School Hill  
Warnham  
West Sussex

30<sup>th</sup> March 2018

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester PO19 1RH

Attention: Planning

As residents of Warnham village in the conservation area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

The cost alone of the proposed incinerator will ensure that the owners take waste from far and wide to recoup the £150 million it will cost. The Government paper on waste 2017 illustrates the lucrative business of industrial waste management: £15.10 per tonnage of metal waste compared to EU €3.26 and £64.29 EEE and vehicle waste compared to EU charging €22.05.\*

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

### **Light Pollution**

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is

proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

We have suffered for years the stink of the landfill site, and having paid for the Biffa biomechanical digester through our taxes, we see no reason why we should suffer further or destroy what is currently a nice place to live.

We strongly object to this proposed carbuncle being built.

Mr and Mrs M Bukin



Ref Obsection  
WSCC/015/18/NH.

AMBERLEY ROAD  
RH12 4LJ

Dear Sirs/

I would like to  
register my objection to the  
building of the incinerator  
in North Horsham.

Please turn down the new application,  
once and for all. Horsham has all  
ready done its share.

Yours Sincerely



Subject: Planning Application WSCC/015/18/NH

From: [REDACTED]

To: [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

Date: Tuesday, 10 April 2018 10:26:30 BST

Dear Sir

I am writing to object to yet another attempt to build a monstrous incinerator adjacent to my home.

The objections I raised last time are still as valid today - namely

- it will impact hugely on the environment. We already have to look at an enormous hill of rubbish which has been accumulating over recent years and now dwarfs the defunct brick works factory chimney. I understand this new chimney will be vastly bigger. So big, it will need to be lit as a hazard to aircraft landing at Gatwick Airport!
- by allowing such a facility to be built adjacent to existing, and proposed housing, you are acting against the advice of the WHO which warns against the location of such an incinerator in a populated area. Why are you choosing to use a site in this populated area with a total disregard of potential health risks to local people? You cannot incinerate without pollution - this is why the chimney has to be so high!
- the local road system is already overcrowded with traffic, and this is before the approved 3,000+ houses are built. There has been a huge increase in traffic since all the new housing at Broadbridge Heath, with enormous lorries now careering along the A24 at hazardous speeds. More and more building is allowed with no regard to transport links or schooling. NB how easy to do you think it will be to sell these proposed new properties if they are adjacent to such an environment hazard?!
- with the current research into the effectiveness of incinerating waste material, it appears that you may be proposing to build a "white elephant" which will not be needed in years to come. Who is going to take it down when the profit dries up and the "owners" decide to move on?

In conclusion, why do WSCC keep agreeing to projects which are against the wishes of the local people? I was not surprised to hear quoted in the media that only two towns in the UK have met their housing planning target, Horsham being one of them. Please act for the good of the local population.



Mr. Edward McDermott  
7 Tennyson Close  
Horsham  
West Sussex  
RH12 5PN

World Cancer Research Fund  
[www.wcrf-uk.org/learn](http://www.wcrf-uk.org/learn)

From: [REDACTED]  
To: [PL Planning Applications](#)  
Subject: Proposed Horsham incinerator  
Date: 11 April 2018 15:21:28

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## Horsham incinerator

In protest to this North Horsham incinerator I am not in objection to the height of the stack as this will distribute emissions over a larger area and how can we now object to this height in relation to the waste heap that has been allowed by west Sussex council to grow on the Warnham landfill site. This was originally a Clay pit of over 100 + feet deep and now we see this blot on the landscape being at least this and more in height . So we now have a rubbish pit 200+ feet deep and will produce waste gas and pollute the North Horsham environment for another 30 years .Ok we have 30 years of gas that feeds CHP plants and gives energy back to the Grid (but who benefits not Horsham residents) but we still in North Horsham still have the STINK the gas smell from Methane and decomposing waste this will continue for at least another 30 years. And all thanks to West Sussex council lack of planning.

My objection to this incinerator is not emotional or to its aesthetics' as the stack will not be much higher in real terms to the waste heap.

My objection is more on the scientific.

If we need to have an incinerator we need to think:

## Questions

- How will we resource this in combination of a North Horsham development. ( Horsham district Council)
- Where will we find the resource to accomodate this venture
- Water (we know that all incinerators are water and liquid waste hungry )
- Waste ( all waste both liquid and fly ash will need to be contained within the site but where will it end up)
- I think that most electrical suppliers will admit that we have no extra capacity for either the North Horsham development let alone an incinerator.
- Contamination issues both from the stack and too ground water.

We will expect that the stack will produce little or no air pollution this is due to EA monitoring? But as we all know the cost all filtration for the stack alone in real terms will require either deep land fill or incineration thus creating other issues both financial and environmental.

The Warnham North Horsham site has issues with ground water Re ( Leachate ) it sits above the green sands aquifer although this is protected at present with a clay base land fill contamination will eventually seep into the lower ground water due to weight above.

We also observe our streams and brooks leading from this site will eventually lead into the Warnham reserve. If this development is not to have a substantial catchment and monitoring area before the reserve we will see total devastation.

In Horsham we will see a water drift from East to West to spot where we see confluence with the river Arun this river raises in St Leonard's forest and drifts south into the sea at Littlehampton

All up steam brooks will be affected if pollution is allowed we in Sussex get drinking water from the Arun and Hardham works, we also derive water from reservoir stocks but in drought we will abstract from rivers and local aquifers.

But we will see that poor management of waste facilities will inevitably leech into our water

supplies. We will have an environmental disaster.

Now with so many government cost can we rely on the EA to monitor our drinking water and all the emissions from exhaust the stacks.

I am not sure that either West Sussex County or the EA have the resource to carry out this.

We will see that both West Sussex County Council and Britannia Crest will be looking at the financial returns and when the environmental impact comes home to roost all will be retired on fat pensions

And it will be the public we will be left to pick up the Tax bill and clean-up bill.

I must say that I am not conversant with the engineering aspects of this proposed incinerator but having audited many facilities over the years I am sure that this will have a huge impact on the community .I realise that our waste issues as far as landfill are now unsustainable and Incineration is the only answer but Horsham is not the best location for this type of infrastructure as it has not the road network or resource to acomoadate an incinerator of this size.

The answers a coastal incinerator with a waste to energy concept where there will be a constant water supply and if located in the right place a good road network .The proposal by Britannia Crest will require a vast amount of waste to feed this beast and it will need to be imported, We will in Horsham be taking all or most of south London waste which requires transport This I feel is a non-win situation for Horsham unless the Council reduces taxes to compensate. But how will this council compensate for loss of life quality and environment.

We all realise that all councils and government are out for short term gains but if this incinerator is built and allowed to operate in relation to the whole Horsham infrastructure projects it will haunt you forever

Regards Tony Hicks

Broome Close

Horsham

RH12 5XG



Campaign to Protect  
Rural England, Sussex Branch CIO  
Brownings Farm, Blackboys,  
East Sussex, TN22 5HG  
**Tel** 01825 890975  
**e-mail** [info@cpresussex.org.uk](mailto:info@cpresussex.org.uk)  
[www.cpresussex.org.uk](http://www.cpresussex.org.uk)

Mr Sam Dumbrell  
County Planning  
West Sussex County Council  
County Hall  
Chichester  
PO19 1RH  
By email: [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

13<sup>th</sup> April 2018

Dear Mr Dumbrell,

**WSSC/015/18/NH: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure. Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD**

This is the second formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above application and should be considered alongside our representation of 4<sup>th</sup> April by Dr Roger Smith, CPRE Sussex Trustee. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

In summary, CPRE Sussex acknowledges the changes in the design and form of the proposed complex from that the subject of the previous application (WSSC/062/16/NH), but still **objects** to this application on the grounds of being **at odds with the prevailing landscape character of the locality of the site, visual impact and loss of tranquillity**, with consequent failure to comply with Policies W11, W12 and W19, and therefore Policy W10, of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework, and there being no material considerations that indicate a decision other than in accordance with the development plan.

Section 38(6) of the Town and Country Planning Act requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. The “development plan” for the purposes of this application comprises the policies of the West Sussex Waste Local Plan and the Horsham District Planning Framework. We consider that the principal material considerations are the National Planning Policy for Waste and the National Planning Policy Framework.

We note that Policy W10 of the West Sussex Waste Plan; Strategic Waste Allocations, allocates the site for, in principle, the development of waste management facilities for the transfer, recycling, and/or recovery of waste to meet identified shortfalls in transfer, recycling and recovery capacity, subject to accordance with the policies of the Plan and satisfactorily addressing the ‘development principles’ for that site identified in the supporting text to the policy.

We consider that Policies W11, W12 and W19 are particularly relevant to this application. Policy W11 requires proposals for waste development not to have an unacceptable impact on the character, distinctiveness, and sense of place of the different areas of the County and to reflect and, where possible, reinforce the character of the main natural character areas.

Policy 25 of the Horsham District Planning Framework also seeks to protect the landscape character of the District against inappropriate development, and only supports development proposals that, inter alia, protects, conserves and enhances landscape character. Policy 26 of the Framework protects the rural character of the countryside and, although it allows for development for the disposal of waste, it establishes that development in the countryside will only be acceptable where it protects and/or conserves and/or enhances the key features and characteristics of the landscape character area in which it is located, including tranquillity.

We note the first sentence of paragraph 5.1.6 of the EIA NTS; *“the scale of existing development such as the Brookhurst Wood Landfill Site and other industrial scale operations in the immediate vicinity of the site means that the landscape character area within which the site sits and adjacent character areas would be able to absorb the 3Rs Facility without compromising its key characteristics.”*

However, notwithstanding the redesign of the complex, the EIA still concludes that the development would have a “moderate adverse” effect on the Horsham Character Area P1: Upper Arun Valley and “minor adverse” effect on K2: Faygate and Warnham Vale. The EIA also concludes that the proposed development would have a minor adverse impact on the larger-scale West Sussex Character Area LW8: Northern Vales (Table 5.6).

The EIA concludes that neither effect is “significant”, which we consider odd for a “moderate adverse” effect, as does the fact that the EIA considers the sensitivity of Horsham Character Area K2: Faygate and Warnham Vale to be low whereas the sensitivity of the other character areas is considered to be medium, even at the larger scales of the West Sussex LCA and

National Character Areas. (We note that the reason given for this is the declining quality of the landscape character, but surely an area where landscape character is declining is more vulnerable to further detrimental change?)

Any argument that an individual development only has a minor effect on landscape character and is therefore acceptable can be repeated too often, leading to the insidious cumulative degradation of landscape character. In fact, the Brookhurst Wood activities are completely out of character with the landscape character of the wider surrounding area, which is pastoral and densely wooded typical of the Low Weald Hills (LW4) as defined by the WSCC Land Management Guidelines. The proposed development would also be completely out of character with the wider prevailing landscape character.

By consolidating the industrial nature of the site and introducing significantly larger buildings (even at the reduced height now proposed) we consider that the proposed development would be harmful to the character of the landscape in which the proposal is located and that the proposed development is therefore contrary to Policy W11.

Policy W12 requires proposals for waste development to be of high quality with the scale, form and design taking into account the need to integrate with adjoining land uses and have regard to the local context, including the varied traditions and character of the different parts of West Sussex, the topography, landscape, townscape, streetscape and skyline of the surrounding area and views into and out of the site. Policy 32 of the Horsham District Planning Framework expects development to, inter alia, complement locally distinctive characters of the district and create a sense of place both in the buildings...and in the way they integrate with their surroundings.

We note that the EIA Non-Technical Summary (NTS) concludes, in paragraph 5.1.4, that *“The site is situated within the context of the existing Brookhurst Wood landfill site and existing industrial development to the north, south and east”*. However, we consider that the EIA here underplays the likely impact of the proposed buildings, which include the very large Boiler Hall building, up to 35.92m high, 59.43m long and 29.58m wide, and the bunker, 32.43m high, 24.15m long and 59.3m wide. These are both of very considerable bulk and, particularly, are of a height significantly higher than any of the existing buildings on the site. They would therefore bear only limited relation to the existing buildings. In addition, the development would include a 95m high flue stack, which would be wholly dissimilar to the existing buildings.

We therefore consider that the existing development on the site would actually provide little in the way of a comparable context for the proposed development. The scale and form of the proposed development would not integrate with the immediately adjoining land uses to the north, south, east or west. As we explain above, we also consider that the proposed development would be against the characteristics of the surrounding area. We therefore consider that the proposed development would not satisfy criterion (a) of Policy W12 of the

West Sussex Waste Local Plan and fail to accord with Policy 32 of the Horsham District Planning Framework.

As regards views into and out of the site, we note that the EIA includes assessments from a number of mid- and long-range viewpoints, including rights of way and other public viewpoints in the vicinity. We note that the EIA concludes that, at worst, the operational phase of the proposed development would have a “minor adverse” impact. However, we do not agree with this assessment from viewpoint 3.

In viewpoint 3 the stack is shown in the photomontage as a prominent feature almost directly in the sightline walking down the footpath. Perhaps the visual impact methodology does come up with “minor adverse” but we think that the methodology does not really fully take into account human perception: the stack is clearly prominent and incongruous in this view and would therefore draw the eye, particularly with a plume.

We do accept that the revised design would reduce the visual impact of the proposed complex as a whole. However, in viewpoint 4, the proposed buildings would be clearly visible in a section of the view framed by existing vegetation, which would focus the eye on the complex. In viewpoint 11, even at the reduced height now proposed, the sheer scale of the proposed buildings would still be unlike anything else in the view and would inevitably draw the eye.

As regards close range views, we noted that the EIA for the previous application did not include any close range view photomontages to confirm the conclusion, in paragraph 5.2.5, of the Non-Technical Summary (NTS) that *“Although the building and stack of the proposed development are large, the majority of them would be heavily screened from view for close range visual receptors. The high level of existing vegetation in the local area means that visibility of the proposed development would be severely limited and where it does appear in local views, only the very top of the building and the stack would be visible.”*

We are pleased to see that the EIA accompanying this revised application does include close range view photomontages. The view from viewpoint 14 Station Road/footpath 1574-1, is particularly telling as it would be of the great majority of the western elevation and part of the southern elevation of the complex. Paragraph 5.8.68 of the EIA concludes that for pedestrians the impact on views would be “moderate to major adverse”. This confirms that our previous concerns about close-range views; that the context would actually do little to reduce the visual impact of the proposed development and that the view of the top of the building and the stack above existing vegetation would serve to demonstrate their sheer bulk and incongruous height, were correct. We also note that, whilst there is some screening of the site along Langhurstwood Lane, this screening is deciduous, and therefore considerably less effective during the winter months.



The photomontages from viewpoints 19 – 26 demonstrate just how tall the proposed stack would be and what a substantial impact it would have. We find it hard to agree with the conclusion of the EIA that the impact on views from these viewpoints would only be “minor adverse”. Only in views from viewpoints 28 and 29 could we possibly agree that the impact on views would be “minor adverse”. Even then, the impact is still adverse i.e. harmful.

Paragraph 3.85 of the Planning Statement submitted with the application states that “*The external colours would also aid the visual reduction in height by having the higher elements in lighter greys with a darker grey plinth at a lower level.*” This appears to be contradictory to paragraph 5.6.12 of the EIA which states that “*the building would be clad in muted brown, green and grey colours*”.

We agree that light grey would generally be preferential for those elements of the development that are visible above the skyline and are therefore seen against the sky. However, some of the viewpoints of the proposed development are at a higher elevation such that the buildings would be seen against a backdrop of land rather than sky (e.g. viewpoints 4 and 11). From here, dark colours would mitigate the impact of the buildings.

We therefore consider that the proposed development would not satisfy criterion (b) of Policy W12.

Policy W19 seeks to ensure that lighting, noise, dust, odours and other emissions will not have an unacceptable impact on public health and amenity. A significant change from the existing operation on the site is the fact that the proposed recovery unit would operate 24 hours a day. This could give rise to activity and noise during the night.

The proposed 24 hour operation would also give rise to a need for external lighting on the site. We note that the EIA indicates that this would be emergency and escape route lighting, lighting of the walkways and stairways around the process equipment which would only be switched on when operators need access to a specific level (but no indication of how often or for how long this may be), and red obstacle lights on the stack and corners of the boiler building. We consider that this lighting would draw attention to the facility – indeed, the red obstacle lights are specifically intended to warn of the presence of the flue and building. We therefore consider the proposed development to be contrary to Policy W19 of the West Sussex Waste Local Plan and Policy 26 of the Horsham District Planning Framework.

Given, in our opinion, that the proposed development fails to accord with Policies W11, W12 and W19 of the West Sussex Waste Local Plan, we also consider that it fails to comply with Policy W10.

As regards material considerations, we note that the National Planning Policy for Waste specifies landscape and visual impacts and noise and light as factors to be considered by waste

planning authorities in the preparation of local plans and in determining planning applications. The National Planning Policy Framework identifies recognising the intrinsic character and beauty of the countryside and contributing to conserving and enhancing the natural environment as core planning principles.

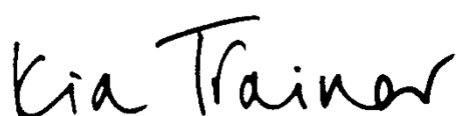
We therefore consider that Policies W10, W11, W12 and W19 of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework are compliant with the National Planning Policy for Waste and the National Planning Policy Framework, that these two documents support these local plan policies and that therefore neither indicate that a decision should be made other than in accordance with the adopted local plans.

In conclusion, therefore, CPRE Sussex **objects** to this application on the grounds of being **at odds with the prevailing landscape character of the locality of the site, visual impact and loss of tranquillity**, with consequent failure to comply with Policies W11, W12 and W19, and therefore Policy W10, of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework and there being no material considerations that indicate a decision other than in accordance with the development plan.

However, if the Council is nevertheless minded to approve the application, we will expect the permission to be subject to conditions and/or a legal agreement controlling the materials and finishes of the proposed buildings (with the careful use of shade and tone to break up the bulk of the buildings), hours of operation, external lighting, noise and other emissions (unless subject to Environment Agency control).

We trust these points will be taken into account in determining this application.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

**Kia Trainor**

**Director,  
CPRE Sussex**

**From:** [Sarah Hall](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [Val Court](#); [Parish Clerk \(Nuthurst\)](#)  
**Subject:** WSCC/015/18/NH - Nuthurst Parish Council  
**Date:** 16 April 2018 14:51:19

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Good afternoon

<b>WSCC/015/18/NH</b>  <b>RESOLVED</b>	<b>Recycling, recovery and renewable energy facility.</b> Former Wealden Brickworks, Langhurst Road, Horsham <b>To object to this application due to the following issues:</b> <ul style="list-style-type: none"><li>• Oppose incineration, prefer 'greener' waste disposal.</li><li>• Waste coming from out of area, increasing HGVs using local roads.</li><li>• With imminent development in North Horsham site will be in 'built up' area.</li><li>• Noise pollution &amp; emissions from increased vehicle movements.</li><li>• Negative visual impact from chimney.</li><li>• Size of construction excessive (large &amp; high) and will have negative impact on Horsham and surrounding villages.</li></ul>
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Kind regards  
Sarah Hall

Clerk to Nuthurst Parish Council  
Tel, [REDACTED]

[Our emails are checked before sending but we take no responsibility for inadvertent transmission of viruses. We advise that email is not secure or confidential. If you have received this message in error you are asked to destroy it and advise us please. Our emails are confidential to the intended recipient, are our property and may not be utilised, copied or transmitted to third parties. This message confirms that it is from an authorised source].

Sir,

I am writing to object to the proposal for the Britaniacrest development near Horsham. The use of the current works is small scale and confined to local waste management. However, the scale of the proposed plant which is unthinkable in a countryside setting close to the market town, will be bringing in large amounts of waste from outside local areas and will put enormous strain on the traffic, roads, and the environment with the greater volumes of lorries coming to the site from across the country.

This is not an environmentally friendly solution to waste management for our local waste but a commercial money making concern for an overseas company that has profit at its core without regard to local concerns.. This monstrosity of a building will be a tower taller than the Statue of Liberty!!! That will spout its hazardous fumes on local and not so local residents. The plume height could range from 6m to over 400m from the top of the 95m stack. The sight of this stack and its plume at over 500m will have a visual impact from much further than suggested.

These visual impact forecasts are totally unacceptable. On top of that, it will be a major source of noise pollution at night and will have a negative visual impact from at least 15km. It is unreasonable that any commercial development of this large scale that will clearly have such an adverse impact on rural communities should be allowed to go ahead. No decision should even be considered without first reviewing the in-depth health study that has been commissioned by Public For England which is due Spring 2017. I believe a similar situation has occurred in France with disastrous results, and it would appear that the proposal is being rushed through to avoid considerations of the results of the study mentioned. Indeed many people are only just becoming aware of it, possibly as it is misleadingly referred to as a technology agnostic and not as an incinerator.

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

The scale of this plant implies waste from outside the local area will be sought to maintain function. Encouraging commercial waste to be transferred over excessive distances and very likely across counties. The Current climate is to increase recycling with the result that there will be an insufficient supply to maintain function.

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 large, ugly incinerator will enhance the local area in fact it will detract for 15km all round from areas of Outstanding Natural Beauty 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 proposal will require aviation lighting as well as have a night time noise impact on the neighbouring communities creating light pollution for the area.

The proposal does nothing to hide the impact it will have on the rural countryside in which it will sit, being totally over powering and intrusive day and night as it sits high above the tree canopy height.

At an operational stage it is acknowledged in the application that at night with low ambient noise levels, the noise increase will be in the order of 6db at several locations.

There seems to be a lack of consideration for alternative means of transport. There is a rail system adjacent to the site. All consideration is via road transfer with its extra burden on the crowded road network and the resulting increase in air and noise pollution.

I live in Faygate and it is totally abhorrent to me that a building of such scale as this should be permitted on the Sussex countryside.

Yours Deborah Davidson

**From:** [sally.pavey](#)  
**To:** [PL Planning Applications](#)  
**Subject:** planning ref: WSCC/015/18/NH  
**Date:** 18 April 2018 13:01:44

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Mr and Mrs R F Pavey  
Warnham Lodge Farm  
Mayes Lane  
Warnham  
West Sussex RH12 3SG

18<sup>th</sup> April 2018

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester PO19 1RH

Attention: Planning

As residents of Warnham parish we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road,  
Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

The cost alone of the proposed incinerator will ensure that the owners take waste from far and wide (stated by Britaniacrest in proposals) to recoup the millions pound it will cost. The Government paper on waste 2017 illustrates the lucrative business of industrial waste management: £15.10 per tonnage of metal waste compared to EU €3.26 and £64.29 EEE and vehicle waste compared to charging €22.05.\*

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

It must be noted that the residue from the Biffa site currently sent to Germany to burn which would suggest that the tonnage price in EU is lower than that of neighbouring incinerators. There are no guarantees that Britaniacrest tonnage price will be favourable to local authorities that seek the cheapest prices to deal with waste.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement as the proposer states waste will be sourced from outside of WSCC to keep the commercial incinerator burning 24/7 and Britaniacrest has stated that the financial backers have to be shown a return on investment in revenue from burning waste to meet the cost of

building the incinerator.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height. The chimney stack will be 95m tall which no UK native tree can hide. The total impact of the buildings cannot be hidden by any landscaping efforts due to the height and scale of this carbuncle of an industrial building in the countryside.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

## **Light Pollution**

For the CAA to demand middle and top of the stack is lit at night is due to flight paths and other aircraft such as the ever-increasing number of helicopters in the vicinity of Horsham. The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site or state that routing will have to be revised, as this would create a permanent obstacle for aviation movements.

The mapping of routes included by the proposers does not include the departure route that flies over North Horsham (WIZAD/TIGER). Flight paths are not lines on the ground but in fact have an impact some 3-5 nautical miles (approx. 1 1/6 miles) either side of the flight path line. The mapping does not show arrivals and there are no mention of the 300-500 go-arounds that impact north Horsham a year from Gatwick.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## **Recycle**



WSSC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa biomechanical digester that taxpayers contributed towards in 2009 when WSSC took the decision not to incinerate waste would virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial/commercial. The EU is encouraging these biomechanic plants over incineration in the EU waste circle of household waste embracing new technology to recycle to a greater percentage.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

The project manager of Britaincrest, Keith Riley, detailed at the exhibition that Biffa recycling plant would become virtually redundant if they build an incinerator. WSSC will be seen to have waste taxpayers money by permitting planning for an incinerator.

## **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35 decibels. This ambient noise levels decrease at night and the operations at the site are proposed to continue at night and so increasing sleep deprivation for those close to the plant as well as noise travels to elevated rural areas that surround the site.

## **Flue Stack**

The proposer has submitted a chimney of 95m as they state it has to be this height to take pollution away from households.

Pollution has to come down to earth at some point and from the plume diagrams

fig 7.1 vol 2 it illustrates a concentration over highly populated areas of Horley and Crawley as well as the Sussex High Weald. The mapping provided provides only details from Charlwood, which is north of the site, and thus much be questionable to its factual evidence it provides.

There are also vital drinking water reservoirs in this direction and we question why no assessment of what the toxins from the chimney pollution, such as arsenic, metals will do to the land, peoples breathing and the water supply.

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014 that is yet to be built by Grundi. With an incinerator already with planning permission on the coast it is highly questionable why an incinerator is needed on the edge of the county surrounded by housing.

Gatwick Airport already has a new incinerator, which burns waste from Manor Royal Business Park as well as Gatwick and heats only one terminal.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old. Under EU guidance air quality should become improved and not allow to deteriorate, an incinerator on such poor roads would inevitably decline air quality.

As to the emissions pour from the stack; we do not trust or believe that the 95m stack will dissipate the ash high as it will be impacted by the 24/7 movements of aircraft and the vortex they create as they climb. It is believed that this will push the ash down to surrounding areas, which will be the new housing estate of North Horsham, with three schools, and Warnham parish and Crawley.

There is no research to prove otherwise only theory to the impact of aircraft above a stack burning waste.

The site sits in a bucket location, lower ground, surrounded by hills, which could cause the emissions to remain locally, we would site the M25 issues with localised decline in air quality due to the bucket effect at Oxted.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

Britaniacrest Project Manager states that the WSCC taxpayer financed recycling plant will become redundant if an incinerator is built. This will make 80-90 people redundant and make a white elephant of the recycling plant that us taxpayers paid for instead of an incinerator in 2009.

## **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

## **Compensation**

There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation for the air pollution that residents will be expected to endure which unknown health implications.

There is no compensation being offered to those whose homes will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

As per norm when building new roads or other major infrastructure projects there is a level of compensation offered to those impacted by such development. It is clear that this planning application offers no such compensation or consideration to the devaluing of a rural, nice place to live currently.

### **UK Cross Party Political oppose incineration**

UK Win are behind the political cross party Early Day Motion (581)\* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK, but this legislation will come way too late for West Sussex.

Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

\*<http://www.parliament.uk/edm/2017-19/581>

Recycling targets nationally go up in smoke as more incinerators are built than required (Daily Mail April 2018). There have been 21 incinerator plants since 2010 when there were already 23 built and another 18 more being built. 10 Million tons of household waste was incinerated in England in 2016 compared with 4.3m in 2010 but since 2010 the amount of rubbish suitable for incineration is down from 30m tons a year to 26m as not all waste can be burnt.

Professor Peter Edwards of Oxford University's chemistry department said "It can be harmful and incineration of course also produced high levels of greenhouse gases."

**European Commission (EC)** calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing

out support for mixed waste incineration. (29 January 2018)

*‘The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs.*

*..... EfW process – must be redefined to ensure that increases in recycling and reuse are not hampered, and that overcapacities for residual waste treatment are not created.*

***Long-term circular economy perspective - The EC’s communication reads: ‘In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy...***

***‘Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators. .... For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.’***

<https://resource.co/article/european-commission-warns-incineration-could-hamper-circular-economy-11632#.WshI2EnzwLA.mailto>

We re-iterate that we strongly oppose the Britaniacrest proposals for an incinerator at Wealden Brickworks.

Yours sincerely

Mr and Mrs R F Pavey

**From:** [Jodie Pearce](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning ref: WSCC/015/18/NH  
**Date:** 17 April 2018 20:56:00

---

Dear Sirs

As a resident of the Horsham area I would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator do not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

## **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we



are very concerned about the ongoing operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

In summary, this cannot be allowed to go ahead, it will be damaging to Horsham, the surrounding areas and the residents in so many ways it must be refused.

Please, please listen to the residents.

Thank you.

Jodie Pearce

37 Bell Road, Warnham, Horsham RH12 3QJ

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WSSC Deadline to object [28th April 2018](#) to an industrial incinerator being built in Horsham

Twitter [ni4h.org](#)

Facebook noincinerator4horsham

[www.ni4h.org](#)

Sent from my iPhone

**From:** [C. Simmons](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection  
**Date:** 17 April 2018 15:04:07

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County Planning

West Sussex County Council

County Hall

Chichester PO19 1RH

Attention: Planning

As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

Yours sincerely

Chris Simmons

Marches Buildings

Marches Rd

Warnham

RH12 3SL

**From:** [Dane Douetil](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD  
**Date:** 17 April 2018 12:21:05

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As a resident of Warnham (Warnham Lodge, Northlands Road, Warnham RH12 3SQ) I object to the proposed incinerator being built.

I don't believe that the proposals for an incinerator meet the WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

## **Light Pollution**

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The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Why do we need another incinerator?**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road

transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

kind regards

*Dane Douetil CBE*

A solid black rectangular box used to redact the signature of Dane Douetil.



**From:** [Debansi, Hans](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** Ref WSCC/015/18/NH  
**Date:** 16 April 2018 15:02:14

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Sir,

I am writing to object to the proposal for the Britaniacrest development near Horsham. The use of the current works is small scale and confined to local waste management. However, the scale of the proposed plant which is unthinkable in a countryside setting close to the market town, will be bringing in large amounts of waste from outside local areas and will put enormous strain on the traffic, roads, and the environment with the greater volumes of lorries coming to the site from across the country.

This is not an environmentally friendly solution to waste management for our local waste but a commercial money making concern for an overseas company that has profit at its core without regard to local concerns.. This monstrosity of a building will be a tower taller than the Statue of Liberty!!! That will spout its hazardous fumes on local and not so local residents. The plume height could range from 6m to over 400m from the top of the 95m stack. The sight of this stack and its plume at over 500m will have a visual impact from much further than suggested. These visual impact forecasts are totally unacceptable. On top of that, it will be a major source of noise pollution at night and will have a negative visual impact from at least 15km. It is unreasonable that any commercial development of this large scale that will clearly have such an adverse impact on rural communities should be allowed to go ahead. No decision should even be considered without first reviewing the in-depth health study that has been commissioned by Public For England which is due Spring 2017. I believe a similar situation has occurred in France with disastrous results, and it would appear that the proposal is being rushed through to avoid considerations of the results of the study mentioned. Indeed many people are only just becoming aware of it, possibly as it is misleadingly referred to as a technology agnostic and not as an incinerator.

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

The scale of this plant implies waste from outside the local area will be sought to maintain function. Encouraging commercial waste to be transferred over excessive distances and very likely across counties. The Current climate is to increase recycling with the result that there will be an insufficient supply to maintain function.

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 large, ugly incinerator will enhance the local area in fact it will detract for 15km all round from areas of Outstanding Natural Beauty 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 proposal will require aviation lighting as well as have a night time noise impact on the neighbouring communities creating light pollution for the area.

The proposal does nothing to hide the impact it will have on the rural countryside in which it will sit, being totally overpowering and intrusive day and night as it sits high above the tree canopy height.

At an operational stage it is acknowledged in the application that at night with low ambient noise levels, the noise increase will be in the order of 6db at several locations.

There seems to be a lack of consideration for alternative means of transport. There is a rail system adjacent to the site. All consideration is via road transfer with its extra burden on the crowded road network and the resulting increase in air and noise pollution.

I have lived in station road for twenty years and it is totally abhorrent to me that a building of such scale as this should be permitted on the Sussex countryside.

Yours Hans Debansi

7 Station Road  
Warnham  
West Sussex  
RH12 3SR

## Hans Debansi

Senior Civil Engineer Technician  
South East  
Infrastructure/Airports

+ [REDACTED] [REDACTED]



Woodcote Grove, Ashley Road, Epsom, Surrey, KT18 5BW

[Main Banner Image](#)



Company



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Consider the environment. Please don't print this e-mail unless you really need to.

**From:** [J Heath](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning ref: WSCC/015/18/NH  
**Date:** 17 April 2018 11:21:59

---

Attention: Planning

As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

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This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

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<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Julia and Stephen Heath, Ilex Place, Mayes Lane, Warnham, Horsham RH12 3SG

**From:** [Elizabeth O'Shea](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Attention: Planning  
**Date:** 17 April 2018 11:28:02

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Dear Sir/ Madam

I would like to register an objection to the planning application for an industrial incinerator known as a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure – planning ref: WSCC/015/18/NH

### **Deceitful**

First and foremost, I would like to strongly object to the letter that we received which talked about the 'Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure'

I feel that this title was fraudulent and very misleading.

Most people would want to encourage 'recycling and renewable energy.'

However the title was designed to be deceitful.

It was obviously designed to mislead the recipient away from the true nature of the planning application, which was to build an incinerator.

I would go as far as to say the planning application letter was unlawful, as it did not highlight the main concern local people would have about an incinerator.

If it wasn't unlawful, then it was lacking integrity and honesty, and was frankly underhand and dishonest.

As a resident of Warnham, I would like to strongly object to the proposed incinerator being built. Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

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 enhance the natural environment.

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...

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

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.

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.



**Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

**Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

**Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

**Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

**Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that I am subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport. This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

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Britaniacrest have made it clear that they do not intend to run the site and so I am very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

**Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Finally, I do not want an incinerator near my home, and strongly object to the misleading letter you sent.

Yours Sincerely,

Elizabeth O'Shea

Elizabeth O'Shea

[Redacted Signature]

**Application No. WSCC/015/18/NH**

**Recycling, Recovery and Renewable Energy  
Facility and Ancillary Infrastructure**

**Former Wealden Brickworks  
Langhurstwood Road, Horsham  
West Sussex, RH12 4QD**

**Applicant: Britaniacrest Recycling Ltd**

**Objections by Liberty Property Trust**

April 2018

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**Application No. WSCC/015/18/NH**

**Recycling, Recovery and Renewable Energy Facility and  
Ancillary Infrastructure**

**Former Wealden Brickworks  
Langhurstwood Road, Horsham  
West Sussex, RH12 4QD**

**Applicant: Britaniacrest Recycling Ltd**

**Objections by Liberty Property Trust**

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April 2018

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## 1. Introduction

- 1.1 DMH Stallard act on behalf of Liberty Property Trust, who are in the process of delivering the Strategic Mixed Use Allocation 'Land North of Horsham', which is immediately to the east of this proposed recycling, recovery and renewable energy facility, and ancillary infrastructure. The Land North of Horsham allocation is at the heart of the adopted Horsham District Planning Framework (HDPF 2015). We submit that this proposed facility would result in significant adverse effects on this Allocation, both on the new housing, and also the proposed high quality business park.
- 1.2 This Britaniacrest scheme would undermine the adopted HDPF policies to allocate a high quality, sustainable, mixed use community at Land North of Horsham which reflects the communities needs. This allocation has now been the subject of an outline planning application, which was granted planning permission on 1 March 2018, (Application No: DC/16/1677). It includes up to 2,750 new homes, a new high quality business park of 46,450 m<sup>2</sup>, new schools, recreation and open space, local centre, all of which would be severely adversely affected by this proposed facility. In particular, there will be new housing, primary school, and new public recreation areas within 300 metres of this site, which we consider is totally unacceptable.
- 1.3 These objections focus on specific areas of serious concern, which we submit together result in overwhelming reasons for refusing this planning application. We will make reference in each case to the policies contained in the West Sussex Waste Local Plan, the Horsham District Planning Framework, and also the relevant planning guidance in the National Planning Policy Framework.
- 1.4 We also submit that the Pre-Application Public Consultation was inadequate. There was very little detail given at the Public Exhibition in January 2018 about the scheme, and scale of the buildings, and the photomontages which were on display only showed one viewpoint from within the whole of the Land North of Horsham strategic development. The Public Exhibition was held on 26 and 27 January 2018, only five weeks before the submission of this planning application. Therefore, although the Britaniacrest literature at the Exhibition sought 'comments and preferences' on the design, there has clearly been very little time allowed for consideration of representations made at that Exhibition.
- 1.5 The Britaniacrest literature at the Public Exhibition stated that they have:-
- ".....done our best to reduce the height and visual impact of the building so far as the technology and cost of construction allows;

.....we have developed two alternative designs to seek feed back on the opinion and preferences of the local community;

.....these two designs have reduced the building height from 48.75 metres (16 storeys) to less than 37 metres (around 12 storeys)."

However, there were no plans displayed which showed the relationship between this proposed development and the approved North Horsham Strategic Allocation. We submit that these revisions to the scheme do not resolve our fundamental planning policy objections, which are set out below.

## 2. Non-Compliance with Planning Policies

2.1 We submit that this planning application is not compliant with a number of planning policies, and should therefore be refused, This Section focuses on the specific policies in the relevant planning policy document, these being:-

- The West Sussex Waste Local Plan 2014
- The Horsham District Planning Framework 2015
- The National Planning Policy Framework 2012

We do not agree with the Planning Statement which accompanies the planning application, where it states that the scheme is compliant with policies in these plans (Section 6 of the Planning Statement, and in particular paragraph 6.102 and Table 4.1 'Summary of Adopted Development Plan Policy Compliance'). We set out in the following paragraphs those policies to which this application is not planning policy compliant.

### **West Sussex Waste Local Plan 2014**

2.2 We recognise that this planning application site is within the area listed in **Policy W10** of the West Sussex Waste Local Plan as being acceptable in principle for the development of waste management facilities for the transfer, recycling, and/or recovery of waste. It is described as the Brockhurst Wood Site – (Policy Map 4). However, we do not consider that this provides policy support for this planning application, for a number of reasons which we will set out in the following paragraphs.

2.3 We submit that there has been a significant change in circumstance since the adoption of the Waste Local Plan, which is a material consideration for this planning application. This is the allocation of land immediately east of this site as a Strategic Mixed Use Allocation at Land North of Horsham in the adopted Horsham District Planning Framework (November 2015). As explained, in Section 1, this land has subsequently been the subject of a

planning application for a mixed use strategic development, to include up to 2,750 dwellings; business park; retail; community centre; leisure facilities; education facilities; public open space; landscaping; and related infrastructure. Horsham District Council approved this application on 1 March 2018.

- 2.4 In describing this 'allocated site', the Waste Local Plan states that the application site is allocated for waste management (Policy AL14). However, this Plan was finalised in 2014, and since that time the Land North of Horsham has been allocated as a Strategic Mixed Use Allocation. The context of this site has therefore completely changed and therefore little weight should be placed on this historic allocation.
- 2.5 It is also relevant to note that the Planning Statement which forms part of this planning application makes very little reference to the proximity of the site to the North Horsham Strategic Allocation. In describing the application site, it is not referred to at all in the 'Surrounding Land Uses', (paras 2.6 – 2.10). It is referred to under the Towns and Villages section of the Planning Statement (para 2.16), but without explaining its close proximity to the application site.
- 2.6 Paragraph 4.35 – 4.49 make reference to the relevant policies in the adopted Horsham District Planning Framework. However, its only reference to the Land North of Horsham Strategic Development is a brief description of HDPF Strategic Policy 2 in paragraph 4.40. It makes no reference to Policies SD1 to SD9, all of which relate to this strategic allocation, and would be affected by this proposed development.
- 2.7 One of the particular effects of this proposed development would be in relation to Langhurstwood Road. Policy SD9 of the HDPF proposed the closure of Langhurstwood Road left in/left out junction onto the A264, and the re-alignment of Langhurstwood Road to the east with a new roundabout junction on the A264. These works directly relate to the proposed North Horsham Strategic Development. The introduction of this additional development onto Langhurstwood Road would result in additional traffic not only using Langhurstwood Road, but also the junction with the A264. We therefore submit that, in considering this planning application, the creation of a new dedicated vehicular access from this site to the A264 should be seriously considered.
- 2.8 Even if this site is considered suitable for some form of waste management facility in principle, the scale of this application is totally unacceptable. Even the Waste Local Plan recognised that there was a need to assess the impacts on the amenity of nearby dwellings and businesses and this was before the allocation of the Strategic Mixed Use Allocation of Land North of Horsham. This is of fundamental significance to the consideration of this application.

2.9 The West Sussex Waste Local Plan 2014 recognises that even if proposed waste management facilities are acceptable 'in principle', they will still need to be considered against a number of Development Management Policies. Our submissions that this application is not policy compliant are summarised below, and will be expanded upon in the following Chapters:-

**Policy W11:** It will not protect or enhance the special landscape and townscape **character** of West Sussex. This is the wrong site for this scale of development, both the bulk and height of the buildings and the height of the 'stack'.

**Policy W12:** It will not be a **high quality development**, and will not be in scale, form or design appropriate for this location, nor be appropriate in the local context. Of particular concern is that the Design and Access Statement only shows the proposed development 'in isolation', and does not show it in the context of its local setting and, in particular, in relation to the approved North of Horsham development. Nor is there any reference to the approved North Horsham Strategic Development in the Site Location/Context in this Design Statement.

**Policy W13:** It will not protect the strategic objective of protecting views from the **North Downs Area of Outstanding Natural Beauty**.

**Policy W14:** It will not protect or enhance the **natural environment** of the County.

**Policy W15:** It will not protect or enhance the **historic environment** of the County.

**Policy W16:** It will have unacceptable impacts of **Air Quality**.

**Policy W18:** It will not minimise **lorry movements** and the use of local roads for the movement of waste.

**Policy W19:** It will harm the **health and amenity** of existing and proposed local residents, businesses and visitors.

**Policy W21:** The **intensification** of use on this site for waste management facilities will result in an unreasonable level of disturbance to the environment and the local community, including the new residents of the North of Horsham strategic development.

2.10 As correctly stated in the applicant's Planning Statement, policies in the adopted **Horsham District Planning Framework 2015** are also relevant to this proposal. We submit that this proposal is not compatible with the core adopted policies in the HDPF on housing, and employment space deliverability that **only** Land North of Horsham can deliver. Other relevant policies relate to conserving and enhancing the natural environment,



transport and healthy communities. We consider that this application is not compliant with these policies, which far outweigh any benefits which may result from being close (in our view far too close) to the strategic development site of Land North of Horsham. The relevant policies in the HDPF to which this application is not compliant include:

**Policy 2:** As this site is immediately to the west of the Land North of Horsham Strategic Allocation (Policies SD1 to SD9) it will not retain or enhance natural environmental resources, including landscapes and landscape character, biodiversity, or retain and enhance the environmental quality, including air.

**Policy 24:** It will not protect the **high quality of the District's environment**, in particular the emissions of air, noise, odour and light pollution.

**Policy 25:** It will not protect the **natural environment** and landscape character of the District.

**Policy 26:** The proposed development is not of a **scale** appropriate to its location outside of built-up area boundaries.

**Policy 30:** Certain views from **North Downs Area of Outstanding Natural Beauty**, a protected landscape, will be harmed.

**Policy 31:** It will have an adverse effect on sites or features for **biodiversity**. It will also harm the enjoyment of the new Green Infrastructure which will be created as part of the Land North of Horsham Strategic Development.

**Policy 32:** The scheme is too large for the site, in terms of bulk and height. It therefore fails to comply with this policy which requires **high quality design** for all development in the District.

**Policy 33:** This scheme does not comply with criteria of the **design principles** set out in this Policy. It will cause unacceptable harm to the amenity of existing and future residents near to the site. Also, even with the proposed reduction in the height of the new building its scale, massing, character and appearance does not relate sympathetically with the existing and proposed built surroundings, landscape, open space, and in particular its impact on the skyline and important views. None of the application plans or illustrative visualisations address these design requirements, which we submit would cause unacceptable harm to the amenity of the existing and future residents near to the site.

**Policy 34:** It will harm the **setting of heritage assets**, including views, public rights of way and landscape features.

**Policy 39:** It will place additional pressure on the **transport infrastructure**, which is very likely to result from the pressure to accommodate waste arising from the wider catchment, particularly from Surrey.

- 2.11 In our view **The Natural Planning Policy Framework 2012** also reinforces our submission that this planning application is not planning policy compliant. The adverse impacts would by far significantly and demonstrably outweigh the benefits of its location close to the sources of waste, and in particular its major adverse impact on the proposed Land North of Horsham Strategic Development, (**NPPF paragraph 14**). It is not compliant with the NPPF Core Planning Principle (**NPPF paragraph 17**) of seeking to secure high quality design (Paragraphs 56, 57, 60 – 67); and a good standard of amenity for all existing and future occupants of land and buildings. Also it will not contribute to conserving and enhancing the natural environment, landscape (Paragraph 115); or heritage (Paragraphs 134 and 135); or in reducing pollution. On the contrary, the scale, bulk and height of the proposed buildings and chimney will cause significant harm. This will be expanded upon in subsequent chapters of this submission.

### 3. Landscape

- 3.1 This planning application is contrary to the following planning policies, as they apply to landscape impact, as previously described:-
- West Sussex Waste Local Plan Policies W11; W12; W13;
  - Horsham District Planning Framework Policies 25, 26, 30.
  - National Planning Policy Framework paragraphs 14 and 17.
- 3.2 The reason why this application is contrary to landscape policies is that the buildings, structures, and the flue stack are of a size which would be clearly visible not only outside of the site itself, but a considerable distance away. In particular, we note that the building heights set out in the Planning Statement include a flue stack of 95 metres; a Bunker of 32.43 metres; a Boiler Hall of 35.92 metres; a Tipping Hall of 12.85 metres; a Turbine Hall of 25.90 metres high; and a Control Room of 18.69 metres. These buildings are also substantial in bulk as well as height, making them even more prominent in the landscape.
- 3.3 As well as the buildings, stack, and lighting, there will be an additional landscape impact from the exhaust plumes from the 95 metre high flu stack. We are concerned that there are no details of the “Plume Visibility” in the Landscape and Visual Resources Chapter of the Environmental Statement. It merely states:-

“.....when the plume is visible, it would increase the perception of the development for visual receptors within the study area, but would not make any of the effects that are likely to arise significant.”

We submit that this description of “Plume Visibility” understates the potential impact. The previous application stated (for the same stack height) that the Plume could be up to 400 metres at certain times, and this would result in giving the area a more industrial appearance. This would therefore still be the case with this application, as there is no proposed reduction in the height of the ‘stack’.

3.4 The Planning Report on the previous planning application (WSCC/062/16/NH) proposed a reason for refusal based on landscape. It stated that by virtue of the poor quality design, and the scale, mass and height of the proposed facility, including the height of the stack, the development would result in unacceptable and significant adverse impacts on: the wider landscape (including on the High Weald Area of Outstanding Natural Beauty and Surrey hills Area of Outstanding Natural Beauty); the character of the surrounding area; heritage assets; and the visual amenity of current residents and the future residents on the North Horsham development. We consider that this reason for refusal should still be made for this planning application, as we consider that the amendments to this scheme do not resolve any of these objections.

3.5 David Williams Landscape Consultancy has provided a high level review of the Landscape and Visual Impact Chapter of the Environmental Statement as follows:

Page/ Para	Issue:	Comment:
<b>Non-Technical Summary Comments:</b>		
3 to 10 / 2.1.11 to 2.1.53	Proposed height of structure	<p>This section describes the development proposal but nowhere in the text does it clearly state what the height of the new structure is to be. Previous scheme roofline was about 45 – 46 metres high. The site layout appears to be same as before.</p> <p>By reference to the DAS (page 8) it seems the building has reduced in height by 7.55 metres which is good, and consideration of coloured materials used again which is good but the building is still about 36 metres tall with a chimney stack of 95 metres.</p>
8 / 2.1.33 to 2.1.35	Landscape Strategy	See comments below
19 / 5.1.5 & 5.1.6	Significant effects	These paragraphs state there will be no significant landscape effects on local or wider scale

		<p>landscapes or upon receiving and surrounding landscapes. This is contradicted by para 5.1.9 which states that 'significant visual effects would be limited to a small number of local views'.</p> <p>Views are part of the character of the area so the comments made earlier by RPS are incorrect.</p>
20 / 5.1.9	Plume visibility	<p>It is not clear where Britaniacrest got their data but 5% of the hours in the year represents about 18 / 19 days assuming the chimney is not visible at night time which it would be as it would require red warning lights (<math>365 \times 12 = 4380 \times 5\% = 219 \text{ hrs} / 12 = 18.25 \text{ days}</math>).</p> <p>That is a reasonable amount of time to see a plume (an alien feature not usually seen in the open countryside).</p>
<b>DAS and Landscape Strategy Plan</b>		
10 / 2.8	Sufficient space to accommodate tree planting	<p>A review of the Landscape Strategy Plan indicates a lot of hedge and tree planting immediately adjoining the roads in the site and also a storage / recycling building. Page 11 illustrates suggested forest tree species which comprise large trees with spread canopies.</p> <p>The location of the proposed trees would not accord with BS 5837:2012 which now requires landscape proposals to take account of the future growth of trees and therefore trees adjoining the building will need to be moved away from the building by about 7-8m to allow for future growth without impacting on the structure. The trees adjoining circulation areas will either have to have the crown of the tree lifted above the height of any lorries (which would potentially break branches) or moved elsewhere. If moved or crown lifted, then some of the screening proposed would be significantly reduced, either way the screening of clutter as suggested would not occur.</p> <p>Also, the planting could potentially conflict with security and need for natural surveillance and security fencing proposals.</p>

		In addition, no planting is proposed along the railway boundary so views from users of the railway line and station will not be screened, the development is likely to be prominent in these views.
<b>Chapter 5 - LVIA</b>		
5-2 / 5.1.9	GLVIA3 method	<p>This para refers to ‘proportional approach’ to LVIA and that the chapter focuses on receptors most likely to experience significant effects.</p> <p>The proportional approach referred to in GLVIA3 relates to its use on different types of projects and trying to limit the number of visual receptors it assesses i.e. not every residential property within a given area but GLVIA3 still requires a broad range of receptors to be assessed taking account defined criteria used to select receptors.</p> <p>Therefore, I would have expected the methodology to include criteria setting out how the viewpoints were selected i.e. key representative views – public / private etc. and similar text / criteria for why certain landscape receptors were chosen. This is absent from the LVIA.</p> <p>It should be noted that the LVIA doesn’t assess the ‘Do nothing scenario’ which is relevant to the assessment matrix below.</p> <p>It should be noted that neither the LVIA or its appendices include a glossary of or definitions of terminology used in the LVIA.</p>
5-10 to 5-16	LVIA methodology	<p>The method described doesn’t follow GLVIA3 although general approach appears correct.</p> <p>In particular, the text relating to sensitivity of receptors (para 5.3.12/ 5.1.13) refers to capacity which is incorrect and should refer to susceptibility which is different to capacity. The LVIA should not deal with ‘capacity’ at all.</p> <p>Susceptibility is defined as “the ability of a defined landscape or visual to accommodate the specific proposed development without undue</p>

		<p>negative consequences” whilst sensitivity is defined as “a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor”.</p> <p>In most cases the susceptibility of a landscape or view is ‘high’ as the proposed development, a large scale / mass and form of the 3Rs proposal would results in undue negative consequences however small.</p> <p>Also, para 5.3.13 confuses matters as sensitivity is about value and susceptibility to specific change not just susceptibility to change.</p> <p>Value relates to “the relative value attached to different landscapes by society. A landscape may be valued by different stakeholders for whole variety of reasons”. The review of existing landscape designations is usually the starting point in understanding landscape value but value attached to undesignated landscapes also needs to be carefully considered (GLVIA3 para5.19) and GLVIA3 Box 5.1 sets out the range of factors that help in the identification of valued landscapes.</p> <p>The RPS LVIA has not considered these factors nor has it properly assessed value of the site and its surroundings / LCAs in the study area.</p> <p>The ranking used in the assessment matrix underestimate the potential significance of effects.</p> <p>This is because there is not a consistent increase in ranking. I would have expected medium sensitivity and medium change to be moderate effect and therefore high sensitivity and low change to be the same and likewise reduced sensitivity and high change to be moderate and ranking across the matrix changed to reflect this.</p>
5-19 / 5.3.33	Scoping responses	<p>I note that Tim Dyers suggested that White Young Green be approached to agree additional viewpoints as Phil Blackshaw was the Landscape</p>



		<p>Architect that worked on Land North of Horsham project.</p> <p>I don't recall Phil Blackshaw ever being involved in Land North of Horsham as HDC had their own Landscape Architect (Mathew Bright and Ines Watson). Therefore, Ines Watson should have been consulted.</p> <p>However, only 4 viewpoints were selected from the Public Right Of Way and appear to be advantageously positioned to avoid future views of the proposed development as housing would intervene.</p> <p>Better views could have been selected i.e. where roads crossed the PROW (i.e. picking up both pedestrian / cycle and vehicle users rather than just users of Public Open Space) and there would be westward views.</p> <p>Whilst Liberty Property Trust granted access for photos to be taken they should have been consulted as to the appropriate location / viewpoints.</p>
5-26 / 5.4.1 & 54.2	Accuracy of ZTV	<p>I find the results of the ZTV surprising in term of the wider area as I would have expected it to show the chimney being visible from a greater area given that it is a 95m structure. It refers to LiDAR data being used but to be clear and transparent (to accord with GLVIA3) the text should set out what heights of buildings and trees were used to create the visual barriers.</p>
5-26 / 5.4.5	Acuity of the eye point	<p>This is all very interesting, but the chimney is greater than 500mm wide so should be clearly visible at distances greater than 5 kilometres and more visible within 1 kilometre of the stack.</p>
5-29 / 5.5.16	HDC Capacity Study	<p>The extracts quoted are correct, but the purposes of the HDC study need to be set out to provide the context.</p> <p>The study considered land suitable for housing development and industrial development up to 12 metres in height not the scale of development</p>

		proposed. Also, there is no indication of how this study informed the assessment. Just referring to the document does not address how it informed the assessment (value / susceptibility and sensitivity points).
5-27 to 5-46	Baseline Conditions	<p>The description of the site and surrounding area appears to be satisfactory. However, there is no consideration of the value or susceptibility (to the specific change) of the landscapes surrounding the site or contribution the Site makes to the area. The base line refers to sensitivity but there is no explanation, justification or rationale given to how / why the sensitivity was determined or considered.</p> <p>To accord with GLVIA3 the assessment needs to follow a logical structured approach which clearly and transparently records how the assessment of and judgement on landscape and visual receptors was reached.</p>
5-46 to 5-6.20	Mitigation Measures	<p>This all appears straight forward although I have already commented on the deficiencies of the landscape proposals.</p> <p>I consider a significant number of trees proposed could not be implemented or they would require a significant amount of tree surgery in the future to avoid impacting on structures or lorry movements negating the effectiveness of the proposals.</p> <p>In short, the site area is too small to accommodate the proposed development whilst allowing sufficient room for the growth of trees to provide the landscape benefits claimed. The benefits offered by the mitigation are therefore exaggerated.</p>
5-48 to 5-61	Construction effects	<p>This all appears straight forward but there is no consideration of the likely predicted activities / changes and their consequential effects that would occur due the development such as loss of / changes to the fabric / elements / features within the Site, introduction of new temporary elements increased traffic movements or patterns or highway improvements offsite (if required) or</p>



		<p>the difference in scale / mass of the proposals compared to the existing.</p> <p>The new facility will become the dominant feature on the Site with all other structures subservient to it, so I find it difficult to conclude that the 'low/medium' change (referred to in most instances in assessing receptors) is correct.</p> <p>A similar effect would occur to the landscape character within which it is located and parts of the adjoining character areas.</p> <p>This change has not been recognised or acknowledge in the assessment. I think the assessment underestimates the magnitude of change and therefore the resultant significance of effects. See paragraph 5.8.8 – it would not affect the inherent value of the LLCA is considered to have.</p> <p>Also, there assessment is not clear or transparent how the changes manifest as magnitude of effects versus sensitivity of the receptor as required by GLVIA3.</p> <p>In terms of views great emphasis is given to the screening of the site from various vantage points but no reference is made to the winter situation although I note site visits were carried out at different times of the year. Another example of underestimating changes / effects is Para 5.7.30 which states:</p> <p><i><u>"Public footpaths 1577-2 and 1578-1 cross farmland to the south west of the A24. There would be <u>views of the high level construction activities</u> on the roof and stack of the 3Rs Facility from footpath 1577-2. The impact on the views of the high sensitivity receptors would be <u>no change or low</u> resulting in No Effect or a <u>Minor adverse</u> effect".</u></i></p> <p>This statement is clearly incorrect as demonstrated by the ZTV which took account of local vegetation / buildings and this clearly shows that the building and stack would be visible and</p>
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		<p>therefore its construction would also be visible so there will be a change.</p> <p>This illustrates a bias in the assessment, if the roof (at 36m in height) and 95m stack are seen, there is clearly a change and therefore the magnitude of change has been underestimated and conclusion flawed. Similar examples are found elsewhere e.g. para 5.7.35.</p> <p>In terms of Land at North Horsham, the assessment this refers to (my underlining key points):</p> <p><i>“Only the most elevated construction activities would be partly visible above the vegetation..... The <u>temporary construction phase of the proposed development</u> would cause a negligible to low change to views for the high sensitivity receptors. This would result in a Minor adverse effect”.</i></p> <p>And also:</p> <p><b>Viewpoint 3 – Public Footpath at Moathouse Farm, 1.6 km east of site (Figure 5.11)</b></p> <p><i>5.7.53 The construction phase of the proposed development would be almost entirely screened from view for the visual receptors travelling west along the public footpath due to the high level of mature vegetation on intervening land. The ground and lower level construction activities would be screened from view, but <u>some partial views of the highest construction activities would be available</u>. The focus of the views available would remain unaffected by the construction works on the site, which would be seen against the skyline amongst the ornamental trees at Holbrook Park. The temporary construction phase of the proposed development <u>would cause a negligible change to views west and would not form a noticeable element amongst the trees</u>. This would result in a <u>Minor adverse effect</u> upon the high sensitive receptors using this local route.</i></p> <p><b>Viewpoint 18 – Moated site to the east of</b></p>
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		<p><b>Langhurstwood Road (within Land North of Horsham public open space) 270 m to the east of the site (Figure 5.26)</b></p> <p><i>5.7.68 Views experienced by people using the Land North of Horsham public open space would have <u>views towards the site screened by new planting within the public open space</u>. As it is, the existing views of the construction activities on site would be barely discernible through the dense woodland. However, the movement and noise would be apparent. The users of the public open space will have a high sensitivity, but the proposed planting will provide further screening. <u>The impact of the construction activities is considered to be negligible and the resulting significance on views would be a Minor adverse effect.</u></i></p> <p><b>Viewpoint 19 – Southern entrance drive to Graylands, 480 m to the north east of the site (Figure 5.27) and Viewpoint 20 – Northern Entrance drive to Graylands, 560 m to the north east of the site (Figure 5.28).</b></p> <p><i>5.7.69 People travelling in vehicles along this entrance road are moving away from the Wealden Brickworks site. However, should vehicles stop, <u>all that people would see of the construction activities on the site would be the construction of the stack, as the lower construction work would be screened by mature woodland</u>. The magnitude of impact on these low sensitivity receptors would be <u>low</u>, resulting in a <u>Minor adverse effect</u>.</i></p> <p><i>5.7.70 Views from the northern access road are more restricted and the magnitude of the impact on receptors travelling in vehicles or walking along PRoW 1573-1 would be <u>negligible</u>. The low sensitivity receptors travelling in cars would experience a <u>Negligible adverse effect</u> and the high sensitivity pedestrians would experience a <u>Minor adverse effect</u> to existing views.</i></p> <p><b>Viewpoint 21 – Field south of Graylands (land proposed as a cemetery within Land North of Horsham development) 610 m north east of the</b></p>
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		<p>site (Figure 5.29) and Viewpoint 22 – Field east of moated site (close to land proposed as allotments within Land North of Horsham development) 600 m east of the site (Figure 5.30)</p> <p><i>5.7.71 People visiting the cemetery and using the allotments would have different views to those that are currently available, as there will be significant amounts of planting associated with the cemetery and the public open space that lies to the west of the allotments. Views of the construction activities on the site would be limited to the work to construct the stack, as dense woodland prevents views of the lower construction activities. The receptors are deemed to have a high sensitivity. The magnitude of impact would be low, and people in these areas would experience a <u>Minor adverse</u> effect on views.</i></p> <p><b>Viewpoint 23 – Footpath 1421-2 (land planned as edge of residential/landscape buffer within Land North of Horsham development) 800 m to the south east of the site (Figure 5.31)</b></p> <p><i>5.7.72 Views will be different to those that now exist, as there will be much more planting between the site and this viewpoint, within the western landscape buffer. However, the existing views of the construction activities would be restricted to the construction of the stack as lower construction work is screened by intervening vegetation. People using the PRoW have a high sensitivity and the magnitude of impact is considered to be low. This results in a <u>Minor adverse</u> effect on views.</i></p> <p><b>Viewpoint 24 – Footpath 1421-2 (land planned to be a green way, adjacent to a school site within Land North of Horsham development) 740 m to the east-south east of the site (Figure 5.32)</b></p> <p><i>5.7.73 Views of the construction activities on the site would be of the construction of the stack only, as lower construction activities would be screened by the dense woodland either side of Langhurstwood Road. The receptors have a high</i></p>
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		<p><i>sensitivity and the magnitude of <u>impact would be low</u>. The resulting significance would be a <u>Minor adverse effect</u>.</i></p> <p><b>Viewpoint 25 – Footpath 1421-2 west of Morris’ Farm, 840 m to the east of the site (Figure 5.33) and Viewpoint 26 – Footpath 1421-2 north west of Morris’ Farm, 900 m to the east-north east of the site (Figure 5.34)</b></p> <p><i>5.7.74 Views of the construction activities on the site from these public footpaths would be of the construction of the stack only, as lower construction activities would be screened by the dense woodland either side of Langhurstwood Road. The receptors have a high sensitivity and the magnitude of <u>impact would be low</u>. The resulting significance would be a <u>Minor adverse effect</u>.</i></p> <p>I find the above statements surprising as in all instances the impact is stated as low, notwithstanding the acuity point about views and distance, the majority of views are from Land at North Horsham are within 1 kilometre. I would acknowledge that low activities will not be seen but no reference is made to lorry movements on roads etc. which would impact on Land at North Horsham</p> <p>I note that a number of the effects are ‘moderate or major adverse’ both on landscape receptors and views.</p> <p>These combined would be significant which contradicts the conclusion set out in the Non-Technical Summary.</p> <p>The above RPS assessment also does not reflect the cumulative assessment contained in the Land at North Horsham LVIA, see below, which concluded that there would be some significant effects arising from the Britaniacrest scheme.</p>
5-61 to 5-74	Operational effects	<p>Following a review of the assessment of landscape receptors, views and representative viewpoint similar comments can be made</p>

		<p>regarding the operational effects.</p> <p>I note that a number of the effects are 'moderate adverse' both on landscape receptors and views.</p> <p>These combined would be significant which contradicts the conclusion set out in the Non-Technical Summary.</p>
5-74	Assessment of Cumulative Effects	<p>This section of the LVIA does not summarize correctly the assessment contained in the Land at North Horsham Environmental Statement (LVIA). Whilst Britaniacrest has reduced slightly the scale / massing of the buildings the stack height has increased by a further 5 metres making it slightly more visible. The Land at North Horsham LVIA only considered a 90 metre height stack and concluded that (extract of relevant text – my underlining):</p> <p><i><u>"the combined magnitude of change due to the 3Rs development and proposed development on the application site will increase slightly; the cumulative effects will be localised to the locality and the impact of these changes is considered to have a minimal (Moderate to Moderate / Minor Adverse effects and not significant) on the wider landscape character."</u></i></p> <p>Whilst in relation to views it stated:</p> <p><i><u>".....from the network of local footpaths to the south west (Receptor No.58) there will be a noticeable change to the views due to the introduction of the 3Rs as the large scale, size and massing of the 3Rs buildings together with the tall chimney stack will be evident in some views from the footpath appearing above the tree line with a small portion of the proposed development on the application site perceived to the east resulting in moderate to substantial adverse effects primarily due to the 3Rs proposals."</u></i></p> <p><i><u>.....from receptors within or immediately adjoining the application site (VR No's. 37, 39, 40, 41, 42, 43, 54, 55, 58, 59, 62, 63, 64, and 73) the</u></i></p>

		<p><u>magnitude of change due to the introduction of the 3Rs proposals will vary due to intervening screening vegetation and time of the year but it is predicted that the effects would range from substantial to minor adverse effects during construction and on completion of the 3Rs scheme.....</u></p> <p><u>Whilst the 3Rs proposals will result in some cumulative visual impacts initially the introduction of mitigation measures within the proposed development on the application site will assist in reducing the visual effects in the longer term but some visual significant impacts may remain.</u></p> <p><u>In longer distance views from locations to the east (Receptor No.45 and 49) near Roffey Park House / Public Footpath No.1587, the predicted visual effects due to the proposed development on the application would range from moderate / substantial to moderate adverse during construction and on completion. However, the proposed 3Rs scheme would form a noticeable new element in the landscape to the west of the application site increasing the magnitude of change experienced from users of the footpath within the High Weald AONB.</u></p> <p><u>Appropriate mitigation measures within the proposed development on the application site will significantly reduce the visual effects of the proposed residential development (resulting in beneficial effects in the longer term) but due to the large size, scale and massing of the 3Rs scheme together with its 90 metre chimney stack, limited mitigation measures are available to reduce the visual effects of the proposals on views from the High Weald AONB. As a consequence of the above, there will be some additional cumulative visual effects from these distance viewpoints."</u></p> <p>The Land at North Horsham assessment is therefore not accurately reflected in the RPS LVIA nor does not LVIA assess any other committed developments listed / shown in Appendix 4.4, some of which would be visible in some of the longer views. There is no explanation given in the</p>
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		LVIA of why these other schemes are not assessed.
<b>Concluding Comments.</b>		
<p>The assessment is similar to the previous assessment in terms of underestimating the scale / mass and form of the development proposed and therefore underestimating the magnitude of change and consequentially the significance of effects. If the assessment was realistic I consider there would be major – substantial effects arising from the Britaniacrest proposals (see Land at North Horsham LVIA cumulative assessment commentary).</p> <p>In addition, the assessment does not follow GLVIA3 guidelines in that:</p> <p>it does not adequately consider the value and susceptibility of receptors; it does not adequately consider the magnitude of change on receptors; and therefore it does not adequately reflect judgements concluded on effects.</p> <p>The LVIA does not clearly and transparently set out in the text the complexity of consideration and judgements made or does it provide the rationale for these judgements.</p> <p>In terms of views great emphasis is placed on screening by intervening existing features in relation to Land at North Horsham. It also refers to the screening effect of new landscaping when there are details available regarding the layout and design of individual open spaces, roads, amenity areas etc. In any event this new planting will take some time 10-15 years to establish and mature to achieve a screen, this does not seem to have been taken into account by the LVIA.</p> <p>In order to provide an accurate assessment, the RPS LVIA needs to be revised and updated to take proper account of the above and also GLVIA3 and advice on good practice for undertaking LVIA.</p>		

## 4. Local Roads

- 4.1 We submit that this planning application is contrary to the following planning policies, as they apply to impact on local roads, as previously described:
- West Sussex Waste Local Plan Policies W19 and W21;
  - Horsham District Planning Framework Policies 2, 24, 33;
  - National Planning Policy Framework paragraph 17.
- 4.2 The Planning Statement for this application states that the proposed facility will be accessed from the existing entrance point to the site (Paragraph



3.70). The Transport Scoping Note by RPS, which forms part of this planning application, describes the present vehicular access arrangements to the site in more detail. It states that “the site access road is subject to 10 mph speed limit, and is generally 6.7 metres wide. It forms the minor arm of a simple priority junction with the western side of Langhurstwood Road, which is subject to a 40 mph restricted speed limit and is a rural single carriageway road. There is no street lighting along Langhurstwood Road and there are no footways. At its southern end, Langhurstwood Road forms a junction with the eastbound carriageway of the A264 via a left-in/left-out arrangement with associated acceleration and deceleration tapers. There are no facilities provided for a right turn movement into and out of Langhurstwood Road on the A264, and so u-turns must be made at junctions to the east and west to accommodate these.

- 4.3 This proposal raises significant traffic concerns, as the proposal of the Land North of Horsham strategic development recognises the existing harmful effects of heavy lorry traffic along this road, which will inevitably be exacerbated by this proposed development. It further recognises that there is a need to improve the junction of Langhurstwood Road with the A264 by means of a new roundabout. This will result in the diversion of Langhurstwood Road through the western part of the Land North of Horsham strategic development.
- 4.4 We are very concerned that this planning application will result in an increase in the level of traffic on local roads including Langhurstwood Road, which will not only adversely affect the Land North of Horsham strategic development, but also other local roads in the vicinity of the site. As this facility would have a far greater capacity to dispose of waste than the existing operation, the catchment will inevitably cover a wider area, and will result in an increase in commercial traffic using local roads, with a resultant harmful affect.
- 4.5 If, despite our objections to this planning application (and those of many others), this scheme is permitted, we strongly submit that as a condition of any approval, Langhurstwood Road is diverted west, rather than east of its present route (prior to the 3R facility becoming operational). A new junction should be formed onto the A264 in order to divert the commercial traffic away from the Land North of Horsham strategic development, as well as from the existing residents along Langhurstwood Road, as set out in Paragraph 2.7 of this Submission.

## 5. Traffic Generation

- 5.1 We submit that this planning application is contrary to the following planning policies, as they apply to traffic generation, as previously described:-

- West Sussex Waste Local Plan Policies W18, W19, W21;

- Horsham District Planning Framework Policy 39;
- National Planning Policy Framework paragraphs 14 and 17.

- 5.2 We note that the Planning Statement states that this proposed facility will not result in any increase in operational traffic over and above that already permitted, and it is on this basis that West Sussex County Council, as Local Highway Authority, are not objecting to this planning application on highway grounds. Given this position, we would recommend that if this scheme is permitted that a planning condition or a Section 106 clause is included to control daily HGV movements.
- 5.3 We are very concerned that, even with a planning condition or Section 106 clause to control the number of vehicle movements, due to the size of this facility, there will be increasing pressure to ensure that it will be used to capacity. This could result in pressure to vary any planning condition to increase the amount of commercial traffic serving this facility, and also to extend the working hours, which could be difficult to resist.
- 5.4 At present, the Planning Statement explains that the Facility will have the capacity to receive 230,000 tonnes of waste per annum (Paragraph 3.3). This is currently the same as is currently approved for the Waste Transfer Station operations. However, there is some uncertainty as to the extent of the catchment for waste. We understand that this facility will mainly serve West Sussex, although some waste may also be derived from East Sussex, Surrey and possibly Hampshire, and this could lead to increasing demand for this facility to accommodate more waste, with the resultant need for increased traffic movements, through a variation of any planning condition. We further consider that there is also a real probability that the demand may extend as far as London.
- 5.5 Britaniacrest has historically applied for variations of planning conditions, one of the most recent being the application to remove a condition on the existing facility relating to vehicular operations and controls. (WSCC/077/15/NH). Though not relating to increasing traffic movements directly, it raises real concerns over the potential for increased activity at the site.
- 5.6 In this regard, it is of significance to read in the 'Cross Boundary Consultation from West Sussex County Council' on the previous planning application that Surrey County Council does not have sufficient residual waste treatment capacity, and is reliant on sending some of this material to 'out of county' facilities. It further states:-

*"...In view of the proximity of the application site to the county boundary with Surrey, the catchment area for the proposed development will include a significant area of Surrey".*

This response reinforces our real concern that there will inevitably be an increase in commercial traffic movements to feed this waste facility, with the resultant unacceptable increased pressure on the local highway network.

West Sussex County Council should also ensure that Britaniacrest have provided appropriate information to confirm that the Proposed Development will not have an impact on the Ashdown Forest and other relevant Special Areas of Conservation. It is noted that this issue has not been addressed at all within the submitted documentation.

## 6. Amenity

6.1 We submit that this planning application is contrary to the following planning policies, as they apply to the amenity of existing and proposed residents and businesses, including those in the Land North of Horsham strategic development, as previously described:-

- West Sussex Waste Local Plan Policies W16, W19, W21;
- Horsham District Planning Framework Policy 24;
- National Planning Policy Framework paragraphs 14 and 17.

6.2 The Waste Local Plan emphasizes in paragraph 7.13 that just because a site is allocated for waste management facilities 'in principle', it does not mean that it will automatically be granted planning permission, as each proposal will be considered on its merits. We consider that this planning application will not only cause harm to existing residents in the vicinity of the site, but also to the new residents and workers who will be within the Land North of Horsham strategic development immediately to the east of the application site.

6.3 Unacceptable impacts on new and existing residents, businesses and visitors are clearly set out in Policy W19 of the Waste Local Plan, all of which apply to this planning application. They are lighting, noise, dust, odours and other emissions, including those arising from traffic, and routes and amenities of public rights of way in the vicinity of the site.

6.4 We note that in relation to Air Quality and Odour, the Planning Statement makes no reference to the proposed North Horsham development.

6.5 It is of particular significance that the proposed stack will need to be 90 metres in height in order to disperse the pollutants. Therefore any proposed reduction in the height of the stack to reduce its significant adverse landscape impact will inevitably increase the likelihood of air pollution impacts on the new residents of the North Horsham development. We remain concerned that significant new housing as well as a primary school, community facilities and significant areas of public open space will be

located within 800 metres of the stack, and also be subject to the significant adverse environmental effect of the 'plume' from the stack.

- 6.6 In relation to noise and vibration generated from this proposed development, again the Planning Statement makes no reference to the North Horsham development. The Noise Assessment does include the North Horsham development within the Study Area, and it is included within the Future Baseline. However, it concludes that reasonable mitigation for noise from the operation of the facility is being proposed, it concludes that noise effects from the operation of the facility are expected to be 'minor adverse' at most. We are concerned that this is seriously underestimating the noise and vibration impact on the residents of the North Horsham development.
- 6.7 We note that with the previous planning application, noise impact was one of the proposed reasons for refusal. With that planning application, the County Council considered that Britaniacrest has failed to demonstrate that the noise from the operation of the proposed facility (both singularly and cumulatively with other development) would not have a significant adverse impact on current residents and the future residents of the North Horsham development. We maintain that this is still the case, and that this reason for refusal should be retained for this application.
- 6.8 The Horsham District Planning Framework includes a Concept Masterplan Map, which clearly shows the extent of new residential development and a high quality business park, which will take place close to this proposed waste facility, as well as educational, recreational and community facilities. Despite this, the Planning Statement for this planning application makes no reference to this in its Summary of Planning Policy Compliance in relation to Policy 19 of the Waste Local Plan. We consider that this reinforces our view that the planning application has not properly considered the fact that this application site is directly to the west of the most significant approved proposal for housing, employment, education, recreation and leisure within the recently adopted Horsham District Planning Framework.
- 6.9 This proposal is therefore not appropriate for this site. There are other more suitable locations within the County, which have been identified in the evidence base for the adopted Waste Local Plan. If there is a real need for this scale of facility in the County, these other sites should be the subject of serious consideration, through the review of the West Sussex Waste Local Plan.

## 7. Conclusions

- 7.1 We have considered all of the application documentation for this proposed recycling, recovery and renewable energy facility and associated infrastructure. We conclude that the development is not compliant with many adopted planning policies, and would cause significant harm which

would not be outweighed by any benefits of the scheme. These adverse impacts would affect both the existing residents, and those who will be living, working, being educated, and enjoying their recreation, within the Land North of Horsham strategic development immediately to the east of this application site.

- 7.2 We have identified those planning policies which are not complied with in both of the relevant adopted local plans, the West Sussex Waste Local Plan 2014, and the Horsham District Planning Framework 2015, as well as with the relevant parts of the National Planning Policy Framework and Guidance. These are extensive, and provide overwhelming reasons why this planning application should be refused.

# The Friends of Warnham Local Nature Reserve

Registered Charity No 1171924



61 Crawley Road  
Horsham  
West Sussex  
RH12 4DS

17 April 2018

Tel: [REDACTED]  
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## **Planning Application - WSCC/015/18/NH : Britaniacrest Recycling Ltd – Incinerator**

Members of the Friends of Warnham Local Nature Reserve have expressed concerns over the above application. In particular, they are worried about the environmental effects of discharges from the proposed incinerator on the Nature Reserve.

Warnham Local Nature Reserve is situated between 1 and 2 kilometres to the south of the proposed installation. The northern boundary is immediately south of the A264 dual carriageway and is just within the kilometre radius drawn on the site map.

The previous application under Reference WSCC/062/16/NH has already been declined by West Sussex CC. A similar application for an incinerator at Capel, which is about 5 km north of the present application, was declined by Surrey County Council a few years back on a whole range of concerns. These included contamination by heavy metals and dioxides in the exhaust.

It is well documented that these contaminants quickly affect lower forms of life, such as mosses and lichens which then enter the food chain to adversely affect the flora, fauna and fungi of the Reserve and well beyond. It could take many years for the effects to become apparent.

The impact on the landscape of the existing landfill - often referred to as 'Mount Rubbish' – is clearly visible for some distance. The proposed incinerator building and chimney would tower 95 metres above the present site and be a further blot on the landscape.

The application paperwork appears to contain several hundred pages which may require more detailed examination by acknowledged experts. Consequently, we would like to record our objection to this development.

Neil Henry (Committee Member – Friends of Warnham LNR)

On behalf of fellow Committee Members: John Wilks, Chris Duffy, Denise Knight, Lyn Whale, Graham Matthews, Eric Baker, Anne Harwood, Richard Symonds, Terry Slattery, Linda Slattery and Tony Utting.





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4 April 2018

Dear Sir,

Consultation response, submitted for and on behalf of CPRE Sussex, objecting to:

**WSCC/015/18/NH**

**Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure**

**Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12**

Please note that this representation, which considers specific environmental issues, is to be followed by a second representation from CPRE Sussex, which will cover other aspects of the application.

What pollutants would be emitted by the proposed facility and in what quantities and where these pollutants would come to earth and their impact on people and the environment, including flora and fauna, biodiversity and ecology, are crucial issues in the deciding of this application – and therefore whether the application, if permitted, would be fully compliant with West Sussex Waste Local Plan (WSWLP), April 2014, Policy W19: Public Health and Amenity and Policy W14: Biodiversity and Geodiversity and Horsham District Planning Framework Policy 24 Strategic Policy: Environmental Protection.

CPRE Sussex is concerned for the following reasons:

**1. Toxicity data for pollutants emitted by the facility seems not to have been included in the application bundle; and how the mix of the various pollutants might impact on human health seems not to have been assessed.**

1.1 Predicted pollutants that could or would be emitted by the facility are given in Volume 1, Chapter 7. Air Quality and Odour and in Appendix 7.5: Sensitive Receptor Results. According to these documents they are:

Nitrogen dioxide, Carbon monoxide, Sulphur dioxide, Particulates, Particulates, Hydrogen chloride, Hydrogen fluoride, Arsenic, Antimony, Cadmium, Chromium, Cobalt, Copper, Lead, Manganese, Mercury, Nickel, Thallium and Vanadium.

1.2 We are concerned that the applicant's Volume 1, Chapter 13. Population and Health' does not include toxicity data for identified pollutants and neither does it provide a hazard evaluation of how the mix of the various pollutants might impact on human health and the environment, including biodiversity and ecology, cumulatively over time.

1.2.1 Please note that according to 'Chief Medical Officer 2017 Health Impacts of All Pollution - what do we know?' (page 2) "*Mixtures and complex chemical combinations are providing new challenges for risk assessment*".

**2. Mapping, showing where pollutants emitted by the proposed facility would come to earth and the extent of resulting ground fall/downwind-hazard areas ought to have been provided for public scrutiny, as part of the consultation.**

2.1 Although the application bundle includes wind roses, for years 2011, 2012, 2013, 2014 and 2015, it appears not to include a map or maps showing downwind-hazard areas - where pollutants emitted by the facility would come to earth.

2.2 We note that the 'wind roses' data was obtained at Charlwood, not from the site of the proposed facility.

2.3 Mapping showing where pollutants emitted by the proposed facility would come to earth and the extent of resulting ground fall/downwind-hazard areas in our view ought to have been provided for public scrutiny as part of the consultation.

**3. Did the Terrain Modelling employed replicate the actual terrain and, if it did, up to what distance from the site of the proposed facility?**

3.1 At paragraph 7.3.26, of Volume 1, Chapter 7. Air Quality and Odour, it is stated that "*The presence of elevated terrain can significantly affect (usually increase) ground level concentrations of pollutants emitted from elevated sources such as stacks, by reducing the distance between the plume centre line and ground level and by increasing turbulence and, hence, plume mixing. A complex terrain file has been used within the model*".

3.2 What is not explained is whether the model employed replicated the actual terrain, in which the proposed facility is located.

3.3 This is an important consideration for the public consultation and should be declared.

**4. The cumulative impact of dioxins and of any other persistent pollutants emitted by the facility, after coming to earth, seems not to have been assessed.**

4.1 According to the 'Annual report of the Chief Medical Officer 2017 Health Impacts of All Pollution - what do we know?', (page 7: 21<sup>st</sup> Century Pollutants):

*"Dioxins and PCBs fall within a class of chemicals listed as persistent because they do not degrade in the environment. They also have little solubility in water, therefore tend to accumulate in fat sources and concentrate up the food chain. Though historically more than 90% of exposure has been through the food chain<sup>8</sup> this has been falling in recent years. Their metabolism and excretion from the body is also slowly adding to their ability to accumulate in humans, animals and fish". And that*

*"Since the 1980's dioxins have been known to elicit many of their toxicological effects via binding to a specific intracellular protein, the aryl hydrocarbon receptor (AHR).<sup>12-15</sup> What had not been known until recently is that this mechanism is important in the activation of immune system cells and is a link to autoimmune diseases (see Figure 3.2).<sup>16</sup> There may therefore be a link between exposure to these chemicals in the environment and the substantial rise that has been observed in autoimmune diseases over the last decade".*

4.2 Unfortunately, the cumulative impact of dioxins and of any other persistent pollutants emitted by the facility after coming to ground seems not to have been assessed.



**5. How pollutants emitted by the facility, individually, collectively, and cumulatively over time, could or would impact on farmland and livestock and the natural environment, including habitats, biodiversity and ecology, seems not to have been assessed.**

5.1 This apparent omission reinforces the need for inclusion in the application bundle of mapping showing where pollutants emitted by the proposed facility would come to earth and the extent of the resulting ground-fall/potential downwind-hazard areas.

In conclusion, we are concerned that the apparent omissions and shortfalls identified above, in respect of the pollutants that would be emitted by the proposed facility, prevent proper assessment being made of whether the application, if permitted, would be fully compliant with West Sussex Waste Local Plan (WSWLP), April 2014: Policy W19: Public Health and Amenity and Policy W14: Biodiversity and Geodiversity, and Horsham District Planning Framework: Policy 24 Strategic Policy: Environmental Protection.

Accordingly, CPRE Sussex asks that that the application be refused.

Yours faithfully,

R F Smith DPhil, BA (Hons), FRGS

Trustee CPRE Sussex

Copy to Director CPRE Sussex

objection  
Reference  
WSCC/015/18/NH  
Mr B. Heneghan.  
25, Badgers Close  
HORSHAM  
RH12 5RU

3/4/2018.

Dear Sir/Mad,

I am writing to object to an  
Incinerator to the North of HORSHAM.

Reasons —

- ① Increase in CO<sub>2</sub> Levels.
- ② Increase in HGV Traffic.
- ③ Possible damage to health.
- ④ I think that an incinerator built so close to Horsham is a danger to health.

Regards



65 Friday Street  
WARNHAM,  
HORSHAM,  
West Sussex  
15-4-2018

REF. WSCC/015/18/NH

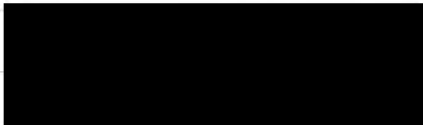
We object the application of the  
BRITANIACREST INCINERATOR,


WE object to the incinerator because the  
Horsham population is large and ever  
growing and we do not want to breath  
the emissions of CO<sub>2</sub> & NOx polluting  
our air from all the HGV's.

We do not want the HGV's, that will  
transport the waste, as our roads are  
congested enough.

The World Health Organisation advises that  
areas near a waste incinerator should not  
be populated and this plan would be near  
to populated areas and the plume would  
blow.

Please count our objection.

 MR J.D. KEABLE

 MRS J.M. KEABLE.

171, Woodlands Way,  
Southwater,  
West Sussex.  
RH13 9DS  
11.04.18


Dear Sir or Madam,

Regarding planning application WSCC/015/18/NH – the building of a waste incinerator.

I would like to **make an objection to this planning permission**. I think we should be concentrating on recycling our waste not burning it, which creates pollution.

We need to build on our improving recycling schemes and send a voice to the rest of the country (& World) that we in West Sussex are seriously trying to save the environment, World resources and create jobs by furthering re use of unwanted items not burning them.

Yours faithfully

  
Miss Susan Tindall

To; County Planning.

West Sussex County Council.

County Hall,

Chichester.

PO19 1RH

Planning Application (a west Sussex Govt. we  
ref WSCC/15/18/114

Two Acres

Langhurst Wood Rd

Horsham RH12 4AD

April 16th 2018

Dear Sirs

I would like to register my objection  
to the proposal for Britan (acast) incineration  
to be built on the site of the old brick works  
on Langhurst Wood Rd.

I feel we have enough environmental  
eyesores on our road and already suffer  
considerable nuisance from the heavy traffic  
that these sites generate.

However my main concern is 95m chimney  
that is proposed. This high chimney is designed  
to widely disperse the effluent from the proposed  
furnaces. It will spread any contamination wide  
across the neighbouring villages of Wanborough, Rosser  
Capel and Faygate plus some of Horsham.

The fact that they want to burn industrial  
waste means that we have no idea of the toxic  
elements in the smoke. A real health hazard.

I think it is irresponsible to site such a facility  
next to an area that is scheduled to have 2,700 homes  
i.e. at least 5,000 new inhabitants.

Yours sincerely

Hayswood  
Northlands Road  
Warnham  
Horsham RH12 3SQ

17<sup>th</sup> April 2018

County Planning  
West Sussex County Council  
County Hall  
Chichester PO19 1RH

Dear Sir/Madam

**Proposed Recycling, Recovery and Renewable Energy Facility, Wealden  
Brickworks, Langhurstwood Road, Horsham, RH12 4QD**

**Planning Reference: WSCC/015/18/NH**

I am writing to object to the proposed incinerator being built.

1. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.
2. There is no element of the proposals that will enhance the natural environment.
3. The proposal will have a dramatic effect on the character of Horsham and so I believe it does not meet the criteria relating to Policy W11
4. The visual impact of the proposed works will be significant - and is out of all proportion to a structure that is visible from many areas of outstanding natural beauty.
5. The comprehensive lighting requirements necessary would have a significant impact on light pollution in the area.
6. The noise levels will be significant and will be well above the ambient noise levels, thus providing increased disturbance to local residents.
7. The road infrastructure is already at breaking point due to the significant building projects along the Crawley-Southwater road [A264 and A24]. Traffic associated with the transportation of waste to the plant would be impossible to accommodate with the existing road system.

The area of North Horsham is already under extreme pressure from present expansion and housing development and I hope that this application will be refused.

Yours faithfully



Pamela Sanders

Hayswood  
Northlands Road  
Warnham  
Horsham RH12 3SQ

17<sup>th</sup> April 2018

County Planning  
West Sussex County Council  
County Hall  
Chichester PO19 1RH

Dear Sir/Madam

**Proposed Recycling, Recovery and Renewable Energy Facility, Wealden  
Brickworks, Langhurstwood Road, Horsham, RH12 4QD**

**Planning Reference: WSCC/015/18/NH**

I am writing to object to the proposed incinerator being built.

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4. The visual impact of the proposed works will be significant – and is out of all proportion to a structure that is visible from many areas of outstanding natural beauty.
5. The comprehensive lighting requirements necessary would have a significant impact on light pollution in the area.
6. The noise levels will be significant and will be well above the ambient noise levels, thus providing increased disturbance to local residents.
7. The road infrastructure is already at breaking point due to the significant building projects along the Crawley-Southwater road [A264 and A24]. Traffic associated with the transportation of waste to the plant would be impossible to accommodate with the existing road system.

The area of North Horsham is already under extreme pressure from present expansion and housing development and I hope that this application will be refused.

Yours faithfully



Michael Sanders



15/4/18

MR GC Cooper  
26 Downsvie Road  
Horsham  
West Sussex  
RH124PF  
email [REDACTED]

Your Ref **WSCC/015/18/NH**

Dear Sir/Madam

I am writing to strongly object to the proposed building of the Britanniacrest Incinerator in North Horsham on the following grounds:

**Non-compliance with West Sussex County Council's Waste Local Plan**

The Non size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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 Britanniacrest 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.

## 2 Visual Impact of the development

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## 3 Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.


## 4 The Environmental Arguments

Britaniacrest suggest that incineration is better than landfill and give the analysis for that – what is not answered is the specifics for the location they wish to put it in ie Horsham and surrounding areas.

It also omits to detail the totality of greenhouse gases, dioxins, heavy metals etc for the area of Langhurst Wood Road, A264, A24, A29, and beyond considering that there are brickworks, landfill which burns off methane gases, Mechanical & Biological Treatment plant and other distribution businesses on the site that attract high numbers of vehicle movements.

NB: An in-dept

Yours Sincerely



GC Cooper

**From:** [Clare Tivey](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Forwarded From G Atkins WSCC/015/18/NH  
**Date:** 17 April 2018 09:02:44

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*Clare*

**Mrs Clare Tivey**

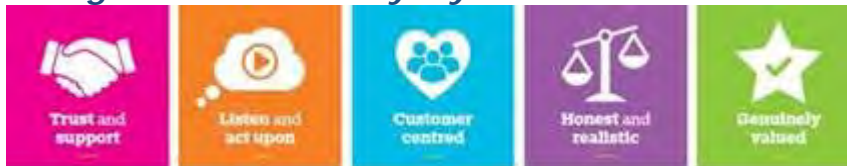
**PA to the Leader, West Sussex County Council**

Rm 102, County Hall, Chichester, West Sussex, PO19 1RQ

Tel: 03302 224998 | Email: [clare.tivey@westsussex.gov.uk](mailto:clare.tivey@westsussex.gov.uk) | [www.westsussex.gov.uk](http://www.westsussex.gov.uk)

*Listen | Inform | Value | Engage*

**Living Our Values Everyday**



Think sustainably. Do you have to print? Can you double side? Do you need colour?

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**From:** Graham J Atkins [REDACTED]  
**Sent:** 16 April 2018 15:26  
**To:** [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); Nigel Dennis; Morwen Millson;  
[elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); Louise Goldsmith  
**Subject:** Planning reference WSCC/015/18/NH

**Attention: County Planning, West Sussex County Council, County Hall, Chichester PO19 1RH**

I am writing to object to the planning application WSCC/015/18/NH the location of which will be adjacent to the Daux roundabout off the A24 / A264.

The proposed site is too close to heavily populated areas and soon to be the location of new housing estates, local schools, the Warnham deer park, and the Warnham Local Nature Reserve.

I have particular concern on the pollution caused by emissions into the air that will enter the soil, surface water and groundwater and eventually the food chain that will pose a major risk to human health. We are talking about dust, nitrogen oxides, sulphur dioxide, hydrogen chloride, hydrogen fluoride, heavy metals and dioxins and furan. Furan is a colourless, flammable, highly volatile liquid that is toxic and may be carcinogenic in humans.

Britaniacrest propose to squeeze a massive incinerator (180,000Te per annum) capacity onto the site named above to take the industrial waste materials from many of the southern counties of England. The chimney will be 96 metres high.

The size of the construction is very large, the chimney very high and they will have a major impact on Horsham and surrounding villages as well as potentially areas of outstanding natural beauty in Surrey.

**The proposed incinerator is non-compliant with West Sussex County Council's Waste Local Plan in the following respects:**

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

Observation: The facility is so large it must be designed to accept waste from all over the South East of England.

**Strategic Objective 10:** To protect and, where possible, enhance the natural and historic environment and resources of the County.

Observation: There is no element of the proposal 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.

Observation: Far from enhancing the environment, it will detract and blight it. The chimney will be visible from 15kms away in areas of Area of Outstanding Natural Beauty.

**Policy W11: Character.** Proposals for waste development will be permitted provided that they would not have an unacceptable impact on: the character, distinctiveness, and sense of place of the different areas of the County.

Observation: It will have a major detrimental impact on local rural villages, Horsham and surrounding 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: the topography, landscape, townscape, streetscape and skyline of the surrounding area site.

Observation: The Britaniacrest proposal does not meet any of the criteria set out above in W12.

**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.

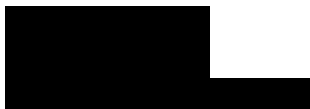
Observation: Such a large facility must necessarily produce such emissions that it must make an unacceptable impact upon public health and amenity.

Observation: Light pollution will be significant. The CAA have demanded middle and top of the stack is lit at night. The stack will increase in light pollution from the plant and the skyline

Regards

Graham J Atkins  
5 Fivens Place  
Horsham  
West Sussex  
RH12 5AS

M:  
T:  
E:





14/4/2018

Dears Sirs,

Planning Application WSCC/015/18/NH.

I should like to register my opposition  
to the planning application to site  
a 36m building and 95m incinerator  
chimney in Horsham.

I work in North Horsham and can  
anticipate air pollution at a very  
unpleasant and dangerous level.

I do not wish to see Britannia Green's  
incinerator in Horsham.

Yours faithfully

MRS R A PRENTICE

**Michael Elkington**  
Head of Planning Services

Planning Officer: Sam Dumbrell  
Tel: 033022 26947  
email: sam.dumbrell@westsussex.gov.uk

www.westsussex.gov.uk

**County Planning**

County Hall  
Chichester  
West Sussex  
PO19 1RH

Tel: 01243 642118



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THE TOWN AND COUNTRY PLANNING ACT 1990  
THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2017  
COUNTY MATTER WASTE APPLICATION (EIA)

**Application Number:** WSCC/015/18/NH  
**Proposal:** Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure  
**Location:** Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD  
**Applicant:** Britaniacrest Recycling Ltd

**Representation from Mrs Gillian Debenham-Taylor - 19 April 2018**

This representation was dictated over the telephone by Gillian Debenham-Taylor (Old Barkfold, Plaistow, Billingshurst, West Sussex, RH14 0PU; tel: [REDACTED]) to Sam Dumbrell (Senior Planner, County Planning, West Sussex County Council) at 10:10 on 19 April 2018. It was recorded in writing at Mrs Debenham-Taylor's request. It reads:

*"I object to the proposed development for the following reasons:*

- The proposed facility, and its stack, is too high and will create an unacceptable visual impact locally;*
- The proposed facility will create adverse odour impacts on the locality affecting those living nearby;*
- The proposed facility will create adverse health impacts on the locality affecting those living locally; and*
- Through siting the proposed facility adjacent to other existing waste and industrial land uses (on the wider Brickworks site), the proposed facility will create an adverse cumulative impact on the locality, affecting those living nearby."*

The above representation was checked over the telephone with Mrs Debenham-Taylor at 11:10 on 19 April 2018. Mrs Debenham-Taylor agreed with Sam Dumbrell that it was an accurate account of her comments.

A copy of this document will be sent to Mrs Debenham-Taylor and to Warnham Parish Council.

A handwritten signature in blue ink, appearing to read "S. Dumbrell".

Sam Dumbrell  
Senior Planner  
County Planning

**From:** [Sally Grover](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Horsham Incinerator  
**Date:** 20 April 2018 16:00:13

---

Dear Sirs

As a resident of the Horsham area I would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator do not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

**Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.



It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the ongoing operation of an incinerator as previously experienced with the landfill site before Biffa took over.

## **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

In summary, this cannot be allowed to go ahead, it will be damaging to Horsham, the surrounding areas and the residents in so many ways it must be refused.

Please, please listen to the residents.

Thank you.

Sally Grover

28 Howard Road, Horsham, West Sussex RH13 6AB

Sent from my iPhone

**From:** [Sheila White](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to Planning Application Number WSCC/015/18/NH  
**Date:** 21 April 2018 13:42:24

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Dear Sirs

I want to place on record my strong objections to this planning application.

Britaniacrest's proposals for this site are totally inappropriate. The site is not big enough for the proposed facilities and so they want to build the structures upwards, as opposed to outwards, resulting in a huge block-house of a building which will dominate and blight the countryside for miles around. The necessary chimneystack to deal with emissions from the incinerator will be even taller, the zone of theoretical visibility extending to 15k from the site. This is totally unacceptable for an area which includes Areas of Outstanding Natural Beauty, National Parks and Gardens and many national heritage assets.

This application does not comply with WSCC's own Waste Local Plan as follows:

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

The applicant wants to import commercial and industrial waste from outside the Horsham and West Sussex area. This will result in more HGVs coming from all over the southern counties (and quite possibly beyond) resulting in extra traffic congestion and pollution.

Strategic Objective 7: *"To maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste".*  
**(see also Policy W18)**

The applicant will be relying on using lorries to move waste to and from the site. They propose accessing the site by means of the A264 and the A24. Both these roads are already subject to congestion, particularly at busy times of the day. In particular, the A24 is a narrow, twisting, single-carriageway road where it runs from the Great Daux roundabout to Capel in Surrey. That stretch of road is little better than a country lane. Local people are aware that there have been many accidents (some fatal) on this stretch of the A24 and speed restrictions and warning signs "Caution Narrow Road" have had to be put in place by the Highways Authority.

Strategic Objectives 8 and 9: *"To protect and, where possible, enhance the special landscape and townscape character of West Sussex" and "To protect the SDNP and AONBs from unnecessary and inappropriate development"* **(see also Policies W11 and W12)**

This application does nothing to comply with these objectives and policies. Despite trying to "downsize" the main incinerator building and cosmetically change its appearance in this second attempt at gaining planning approval for this monstrosity, the bulk of the main incinerator building, together with the 96m high chimneystack to cope with its emissions, would overpower the local landscape. The site is in a rural location surrounded by fields and woodland, totally unsuited to a huge industrial structure such as this. It would have a major adverse impact on Horsham and the surrounding villages, with its adverse effects reaching as

far as Areas of Outstanding Natural Beauty in both Sussex and Surrey.

**Strategic Objective 10:** *“To protect and, where possible, enhance the natural and historic environment and resources of the County”*. (see also Policies W11, W12, W14 and W15)

Clearly this application contravenes this strategic objective and the policies stemming from it. This enormous, ugly incinerator with its accompanying stack, visible for 15km (and more when emission plumes are visible) would blight the immediate and surrounding areas, including the nearby Areas of Outstanding Natural Beauty and designated parks and gardens. Within 1.5km of the site is the historic village of Warnham with its Conservation Area. In close proximity to the site there are many national heritage assets (including important scheduled monuments and 36 listed buildings). Just on the other side of the A264 is the Warnham Nature Reserve. This 92 acre site was designated a Local Nature Reserve in 1988. It includes a 17 acre millpond, marshes, grassland, reed beds, hedges and woodlands. The site provides a haven for a variety of wildlife including over 100 species of bird. The inevitable 24/7 noise and night-time light pollution from the incinerator would certainly disturb the wildlife on the nature reserve in contravention of Policy W14.

**Strategic Objective 13:** *“To protect and, where possible, enhance the health and amenity of residents, businesses, and visitors”*. (see also Policy W19)

Again, this application is non-compliant. The industrial incinerator would do absolutely nothing to enhance the health and amenity of residents, businesses and visitors! The results of ongoing research into the possible harmful effects of emissions from incinerators are still awaited. Public Health England’s study results have been delayed several times already. Certainly no decision on this application should be taken until the results of this research are made public and can inform the decision-making process on this application.

Horsham District Council recently approved plans for a huge new housing development next to the proposal site (Planning Application DC/16/1677). There will be 2,750 new homes and three new schools on the development. The plans for this housing development show a primary school abutting the applicant’s site. The prevailing airflow means emissions from the stack will flow directly over the school and the new houses. West Sussex County Council have a duty of care to ensure the health and amenity of the residents of this new development are not endangered by allowing an industrial incinerator to be built nearby.

**Traffic** – Traffic in this area has increased steadily over recent years. 2,000 new homes on the “West of Horsham” developments, the large housing development at Kilnwood Vale on the A264 towards Crawley and various other smaller development in the area have meant added congestion in and around Horsham town and hold-ups on the roads leading to it (including, of course, the A264 and A24). The new development on Land North of Horsham will add even more traffic congestion and pollution. At the Government Inspector’s Hearings in connection with the Horsham District Planning Framework and Land North of Horsham development, he intervened to request modifications to the HDPF to try to alleviate the problems on the A24. This followed representations from Mole Valley District and Surrey County Councils who had concerns about the impact extra traffic was going to have on their areas. One of the mitigation measures was to have traffic light controls on the Great Daux roundabout. This will lead to HGVs pumping out polluting diesel exhaust fumes as they sit waiting for the lights to change on

their journeys to and from the incinerator site. With up to 284 (and rising?) HGV movements per day to feed the monster, it will be a very unpleasant experience living in this locality.

**Light and Noise Pollution** - Aviation lighting will be necessary on both the massive structure housing the incinerator and also the stack, so there will also be an adverse effect on the local area from light pollution at night.

In addition, there is the matter of noise which, it is understood, can have a harmful effect on people, particularly if it affects their sleeping pattern. It is acknowledged that an increase of anything over 5dB indicates an adverse impact on people. The applicant acknowledges that at night, in the operational stage, there would be an increase in background noise levels for local residents of 6dB. This is unacceptable.

Policy W21: “**Cumulative Impact**. Proposals for waste development, including the intensification of use, will be permitted *provided that an unreasonable level of disturbance to the environment and/or local communities will not result....*”

Clearly the application does not comply with this policy. There are so many adverse impacts stemming from this proposal, it is difficult to enumerate them all. Suffice it to say that the cumulative adverse impact on local communities (and even on those further afield) should dictate that this application is refused in its entirety.

Name: William Harwood White

Address: 1 Great Daux Cottages, Dorking Road, Warnham, RH12 3QQ

[REDACTED]

Sent from [Mail](#) for Windows 10

From: [REDACTED]  
To: [PL Planning Applications](#)  
Subject: OBJECTION: Planning ref: WSCC/015/18/NH  
Date: 22 April 2018 19:37:01

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From: Keith Baptist  
Oaktree House  
Langhurstwood Road  
Horsham RH12 4QD

Attention: Planning

As a resident of the Horsham area I strongly object to the proposal of building an incinerator being near my house.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I request that WSCC have a full council meeting to discuss the planning application.

The proposals for an incinerator does not meet WSCC waste plan:

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

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic negative effect on the character of the Horsham area and the countryside, and so I believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

**Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

**Light Pollution**

For the CAA to demand that the 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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young

and old.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so I am very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, I therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Yours sincerely

Keith Baptist

--

WSCC Deadline to object 28th April 2018 to an industrial incinerator  
being built in Horsham

Twitter

Facebook noincinerator4horsham

**From:** [ANITA BAPTIST](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Re: OBJECTION: Planning ref: WSCC/015/18/NH  
**Date:** 22 April 2018 20:06:54

---

From: Anita Baptist

Oaktree House  
Langhurstwood Road  
Horsham RH12 4QD

Attention: Planning

As a resident of the Horsham area I strongly object to the proposal of building an incinerator being near my house.

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I request that WSCC have a full council meeting to discuss the planning application.

The proposals for an incinerator does not meet WSCC waste plan:

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

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic negative effect on the character of the Horsham area and the countryside, and so I believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

**Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed



incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

For the CAA to demand that the 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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so I am very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, I therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Yours sincerely

Anita Baptist

**From:** [Paul](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [Liz Kitchen](#); [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Morwen Millson](#); [Nigel Dennis](#)  
**Subject:** WSCC/015/18/NH  
**Date:** 22 April 2018 20:25:29

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To whom it may concern,

I strongly object to Britaniacrest's planning application for an incinerator in Horsham for the following reasons:

Horsham is a beautiful market town, one which I enjoy living and working in. The planning application for an 'Industrial & Commercial' waste INCINERATOR labelled as a 3 'R's' facility on the planning application (I wonder why they haven't called it an incinerator...?) is absurd, and should be rejected at the earliest possibility. The Britaniacrest site itself is clearly not appropriate for such a construction - its too small and too close to residential property (both current and the future 2750 homes). The sheer scale is excessively large (taller than any building in the town), and will over shadow the surrounding businesses and residential areas. With the chimney being 96m as tall as BIG BEN and the building so high it will ruin the character of the area surrounding the site - which is currently more residential than business and set to increase with more homes being planned for the area by Liberty Developments. Should this go ahead it will be a blot on our lovely countryside, and fundamentally change the nature of Horsham and the surrounding villages forever.

Lets not forget that this is a £150 million pound commercial investment for profit. A 24 hours a day, 365 days a year operational commitment for the next 25 to 30 years - it can't be switched off. It will be churning out pollution from commercial and industrial waste trucked in from a 40 mile + radius of the site, with associated pollution from that plus plumes of 'products of combustion' (pollutants and toxic particulate matter!) being sent as high as 0.5km above the ground. Since what goes up must come down...the affects of this is far reaching and includes all residents within a 5-10km radius of it.

What will be done with the toxic bottom ash...? 20 to 30% of the waste that it burns is turned into ash that will need transporting onto specialist treatment/storage/land fill...something for your/our children's generation to have to deal with. If investment is placed in destroying these raw materials through incineration, then investment in recycling technology is smothered for at least the next 25/30 years. Look at other countries that have gone down this route (e.g Denmark) and in fact more closer to home in South Wales - you will find that many of the benefits claimed by Waste Management companies are not being met. More and more waste is having to be imported to feed these machines (profit) and the current un-recyclable waste (with advances in technology this un recyclable could be recycled) does not have a high enough calorific value, so they are having to dismantle recycling schemes to have the needed items to then burn (i.e paper/cardboard etc) to generate enough heat to produce electricity....clearly this is not good for the environment nor

the people living within it.

I am also very concerned about the noise such a site will produce. Estimates are suggesting a 6dB increase in night time noise (that's a doubling of background noise whilst trying to sleep) - my question is will this be a constant humming at 6dB, or a spontaneous crashing and banging of plant and machinery on and off constantly throughout the night...? The quality of life of all those living within this proposed Incinerator site has to be valued and considered. If the Incinerator goes ahead I am concerned too about the constant whirring of wind around the chimney structure which will be in place to hold it up...this will be a nuisance and again affect the quality of life of those living within close proximity to the site. Furthermore, this combined with permanent 24/7 lighting of the building and the chimney stack (lights on each corner of the high building and those on the stack itself), is I feel another unacceptable impact on public health.

Along with the above personal comments I wish to include the following objections demonstrating how the application is non-compliant with the West Sussex County Council's own 'Waste Local Plan' (2014) in relation to the size of the construction being excessively large and high. It will have a major impact on Horsham and the surrounding villages as well as Warnham Nature Reserve and AONBs (areas of outstanding natural beauty) in both West Sussex and Surrey. It also contradicts the plan in relation to the following specific strategic objectives as outlined in the plan:

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 will be seeking waste from outside the local area (from Britanniacrest website 'Customer base of 100 mile radius'), and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator. Already noted above, the waste will then be transported away from the site too with sites earmarked as far as Cheshire!

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 large, ugly incinerator will enhance the local area in fact it will detract and blight a rural location as it will be visible from 15kms away in areas of AOB (Area of Outstanding Natural Beauty). We should question 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 the areas of Horsham.

We should question the pollution from the increase in road traffic and the impact it will have on business travel in delays and detrimental impact on the areas of Horsham.

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.

I trust that all my points raised will be duly considered by WSCC, and hope that the right decision of rejecting this application is made for the future of Horsham and it's residents asap.

Yours sincerely

Mr P Stepney  
Trafalgar Road

Horsham

**From:** [soames hargreaves](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning Ref WSCC/015/18/NH  
**Date:** 23 April 2018 09:34:39

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Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in North Horsham and am writing to object to the above planning application. The proposals for an incinerator does not meet WSCC waste plan for the following reasons:

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

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.

This incinerator clearly does not meet this requirement.

#### Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is

the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

#### Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

#### Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

#### Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely

Soames Hargreaves

[REDACTED]  
9 Durfold Road  
Horsham  
West Sussex  
RH12 5 HZ

**From:** [Sharon Gardner](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Proposed Incinerator  
**Date:** 23 April 2018 10:21:43

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#### Attention: Planning

As residents of Slinfold we would like to strongly object to the proposed incinerator being built. Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

**Highways** - it would add just under 300 HGV movements to the congested roads reducing the air quality.

#### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

#### **Light Pollution**

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### **Recycle**

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

#### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

#### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an



incinerator is needed on the edge of the county.

**Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

Regards

Sharon & James Gardner  
Lane End Farm  
Slinfold  
RH13 0QS

**From:** [Clive Phillips](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** Reference WSCC/015/18/NH - objection  
**Date:** 23 April 2018 11:13:17

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Dear Sirs/Mesdames,

I am writing to lodge an objection to the proposed Britaniacrest incinerator at North **Horsham**, near the Brickworks off the A264 close to Great Daux Roundabout.

Grounds for the objection:

- **Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the planned construction is excessively large and high and will have a major impact on Horsham and surrounding villages as well as potentially on areas of outstanding natural beauty in Surrey.

**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 seems to be seeking the import of waste from outside the local area and thus will encourage commercial waste being transferred over long distances to feed a very large incinerator.

**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. In fact, it will detract and blight it, being visible from 15km away in areas of Area of Outstanding Natural Beauty. I question the pollution from the emissions including lead, mercury and dioxins, the increase in road traffic, the impact it will have on business travel in delays and the 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.....

This aspect of policy will not be met by the proposal, as the incinerator chimney stack will be seen from villages and have a 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 and will exert a night-time noise impact on neighbouring communities, creating light pollution for the area.

## Light Pollution

The CAA is requiring the middle and top of the stack to be lit at night. The CAA would not be demanding such comprehensive lighting if flight paths 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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and on the skyline.

## Recycling

WSCC have shown a 2% increase in recycling. Burning waste may tie the council into 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 overcapacity 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.

The proposer has stated that they intend to burn residential black sack waste as well as industrial waste. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers' money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## Noise Pollution

As the site will operate 24/7 it will create noise above the ambient noise experienced 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.

## Visual Impact of the development

The proposal does nothing to hide the impact it will have on the surrounding countryside, being totally overpowering and intrusive day and night as it protrudes and projects above the tree 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.

## Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

## The Environmental Arguments

Research increasingly indicates that incineration reduces recycling.

Furthermore, incineration plants in EU countries 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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. If the proposal is granted planning consent, West Sussex be left with a harmful white elephant.

Best regards,

***Clive Phillips MA(Oxon)***

44 Cissbury Close  
HORSHAM  
RH12 5JT

**From:** [Debbie Hargreaves](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Fwd: Planning Ref WSCC/015/18/NH  
**Date:** 23 April 2018 16:58:40

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Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in Durfold Road North Horsham and am writing to  
object to the above planning application.

The proposals for an incinerator does not meet WSCC  
waste plan for the following reasons:

Strategic Objective 5: to make provision for a new  
transfer, recycling and treatment facilities as close as  
possible to where waste arises. The scale and throughput  
of the proposed plant is incompatible with the disposal of  
local waste and will attract material from outside of the  
county.

It is clear that this proposal goes against the WSCC waste  
policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character  
of Warnham and Horsham and so we believe it does not  
meet the criteria.

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.

This incinerator clearly does not meet this requirement.

Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB:

<https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

#### Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014.

With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

#### Air Quality


The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely  
Debbie Hargreaves

  
9 Durfold Road  
Horsham  
West Sussex  
RH12 5 HZ

**From:** [Jane Gardiner](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning Ref WSCC/015/18/NH  
**Date:** 23 April 2018 19:22:37

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Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden  
Brickworks, Langhurstwood Road, Horsham,  
West Sussex, RH12 4QD

I live in The Castle North Horsham and am  
writing to object to the above planning  
application.

The proposals for an incinerator does not meet  
WSCC waste plan for the following reasons:

Strategic Objective 5: to make provision for a  
new transfer, recycling and treatment facilities  
as close as possible to where waste arises. The  
scale and throughput of the proposed plant is  
incompatible with the disposal of local waste  
and will attract material from outside of the  
county.

It is clear that this proposal goes against the  
WSCC waste policy to recycle close to origin of  
waste.

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  
enhance the natural environment.

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.....

The proposal will have a dramatic effect on the  
character of Warnham and Horsham and so we  
believe it does not meet the criteria.

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. This incinerator clearly does not meet this requirement.

#### Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB:

<https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

#### Noise Pollution

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

#### Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

#### Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely

Jane Gardiner  
4 The Castle

Horsham  
West Sussex  
RH12 5PX

Sent from my iPad

**From:** [Lisa Kent](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** Objection to Reference WSCC/015/18/NH  
**Date:** 23 April 2018 20:07:33

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Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Lisa Kent

Address: 36 Warren Drive, Southwater, West Sussex, RH13 9GL

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

## Light Pollution

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## Recycling

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## 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.

## **Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## **Noise intrusion**

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

## **The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Lisa Kent

**From:** [John Porter](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD  
**Date:** 23 April 2018 21:13:02

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Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in Haybarn Drive North Horsham and am writing to object to the above planning application.

The proposals for an incinerator does not meet WSCC waste plan for the following reasons:

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

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. This incinerator clearly does not meet this requirement.

Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center,

Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

#### Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

#### Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

#### Air Quality



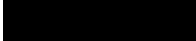
The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely

Dr.s John and Emma Porter  
1 Haybarn Drive  
Horsham  
RH12 5JF  


**From:** [Rebecca Roads](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#)  
**Subject:** Objection to Reference WSCC/015/18/NH  
**Date:** 23 April 2018 21:41:20

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Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Rebecca Roads

Address: 7 The Crescent, Horsham, West Sussex, RH12 1NA.

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

### **Light Pollution**

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycling**

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

### **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.

### **Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

### **Noise intrusion**

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 would seem a significant increase in noise that local residents would have to tolerate.

### **The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Rebecca Roads

Sent from my iPhone

**From:** [Sarah Scott](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to the planning application for an industrial incinerator - planning ref: WSCC/015/18/NH  
**Date:** 23 April 2018 22:07:35

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Attention: Planning

To whom it may concern.....

As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

**Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Please note this as a formal objection to the planning request.

Regards,

Clive and Sarah Scott  
9 Lakeside  
Horsham  
West Sussex  
RH12 2LS



**From:** [Andrew Kent](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** FW: Objection to Reference WSCC/015/18/NH  
**Date:** 24 April 2018 08:56:28

---

Good morning

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Andrew Kent

Address: 36 Warren Drive, Southwater, West Sussex, RH13 9GL

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

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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.

## Light Pollution

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## Recycling

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial.WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## 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.

## Visual Impact of the development

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

## The Environmental Arguments

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Andy Kent

**“Celebrating 50 years of cleaning innovation”**

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55 Ifield Road,  
Crawley,  
West Sussex,  
RH11 7AS

Opening Hours 8:00am - 5:00pm Monday - Friday

Telephone: [REDACTED]

Website: [www.scjs.co.uk](http://www.scjs.co.uk)

**From:** [George Kent](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to Reference WSCC/015/18/NH  
**Date:** 24 April 2018 09:20:04

---

Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: George Kent

Address: 32 Linden House, Chart Way, West Sussex, rh12 1qb

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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

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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.

### **Light Pollution**

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### **Recycling**

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

### **Noise Pollution**

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Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

George Kent  
iPhone

**From:** [Rachel Ward](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to Reference WSCC/015/18/NH  
**Date:** 24 April 2018 09:31:31

---

Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Rachel Ward

Address: 18 Linden House, Chart Way, West Sussex, RH12 1QB

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

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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.

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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.

### **Light Pollution**

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.

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WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial.WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

### **Noise Pollution**

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Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Rachel Ward

From: [Suzanne Baker](#)  
To: [PL Planning Applications](#)  
Subject: Objection to Reference WSCC/015/18/NH  
Date: 24 April 2018 10:26:02

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----- Original message -----

From: George Kent [REDACTED]  
Date: 24/04/2018 09:27 (GMT+00:00)  
To: [REDACTED], Emma Docherty  
<[REDACTED]>, Suzie Baker <[REDACTED]>,  
[REDACTED]  
Subject: Fwd: Objection to Reference WSCC/015/18/NH

Hi,

I would like to object to the  
incinerator, Reference **WSCC/015/18/NH**.

Name: Suzanne Baker  
Address: 11 North Heath Lane, Horsham, RH12 5XA

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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

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incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Suzie Baker  
iPhone

**From:** [Anna Lorkin](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to Reference WSCC/015/18/NH  
**Date:** 24 April 2018 10:34:46

---

Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Anna Lorkin

Address: 59 Roundel Drive, Leighton Buzzard, LU7 4RL

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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

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Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Anna Lorkin

**From:** [Lizzie Bennett](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to WSCC/016/18/NH  
**Date:** 24 April 2018 13:41:35

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Hi,

I would like to object to the incinerator, Reference **WSCC/015/18/NH**.

Name: Lizzie Bennett  
Address: 7 Depot Road, Horsham, West Sussex RH135HB

**Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

### **Light Pollution**

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycling**

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial.WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

### **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.

### **Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

### **Noise intrusion**

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 would seem a significant increase in noise that local residents would have to tolerate.

### **The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant.

Kind regards,

Lizzie Bennett

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**UNITED KINGDOM WITHOUT  
INCINERATION NETWORK**

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**Britaniacrest Recycling Ltd Application for  
Former Wealden Brickworks (Site HB),  
Langhurstwood Road, Horsham  
West Sussex RH12 4QD**

***Application Reference: WSCC/015/18/NH***

**UKWIN Objection and  
Request for R1 Planning Condition**

*"Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure"*

**April 2018**



## Introduction

1. The United Kingdom Without Incineration Network (UKWIN) was founded in March 2007 to promote sustainable waste management. Since its inception, UKWIN has worked with more than 120 member groups.
2. As part of fulfilling our aims and objects, UKWIN works to help facilitate access to environmental information, public participation in environmental decision-making, and access to justice in environmental matters. Where relevant we also make representations to consultation exercises to help ensure that relevant matters are considered.
3. In addition to **objecting** to the proposal, this submission also asks that further information be requested of the applicant by the Waste Planning Authority (WPA) and that, if planning permission is granted, a Design Stage R1 Planning Condition is attached in line with the condition previously imposed by the Secretary of State.

## Relevant Government Statements in Relation to Climate Change

4. Incineration is known to exacerbate climate change by releasing CO<sub>2</sub> when waste is burned. According to the Environment Agency: *"Between 0.7 and 1.7 tonnes of CO<sub>2</sub> is generated per tonne of MSW [Municipal Solid Waste] combusted"*.<sup>1</sup>
5. The importance of understanding the specific technology being proposed as well as the net carbon impacts of the proposed facility compared to alternatives and the importance of understanding the assumptions regarding feedstock volume and composition, and how these are expected to change over time, is underscored by the Government's 2011 Review of Waste Policy.
6. We note, for example, that Paragraph 209 of the 2011 Waste Review states that: *"...while energy from waste has the potential to deliver carbon and other environmental benefits over sending waste to landfill, energy recovery also produces some greenhouse gas emissions. It is important to consider the relative net carbon impact of these processes, and this will depend on the composition of feedstocks and technologies used"*.

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<sup>1</sup> According to page 5 of the Environment Agency's "Pollution inventory reporting – incineration activities guidance note Environmental Permitting (England and Wales) Regulations 2010 Regulation 60(1)", Version 4 December 2012 available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296988/LIT\\_7757\\_9e97eb.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296988/LIT_7757_9e97eb.pdf) "Between 0.7 and 1.7 tonnes of CO<sub>2</sub> is generated per tonne of MSW [Municipal Solid Waste] combusted".

7. Similarly, Paragraph 230 of the 2011 Waste Review states: "*Waste infrastructure has a long lifetime and therefore changes in the composition and potential volumes of waste in the future cannot be ignored in the development and selection of technologies now*".
8. The adverse environmental implications of waste incineration include the exacerbation of climate change through the release of greenhouse gas (GHG) emissions.
9. For the facility proposed for Horsham, with its 180,000 tonne per annum capacity, this equates to between about 126,000 tonnes and nearly 306,000 tonnes of CO<sub>2</sub> released for each year of operation, or potentially more than around **9 million tonnes of CO<sub>2</sub>** over the anticipated 30 year operational period.
10. This should weigh heavily against the proposal.
11. UKWIN notes the explanation in the Government's EfW Guide that: "*Fossil based residual wastes, e.g. plastics that cannot be recycled, do not decompose in the same way as biogenic material in landfill. For these waste streams conventional energy from waste will almost always deliver a negative carbon balance compared to landfill...*"<sup>2</sup>
12. The applicant appears to have compared the proposed incinerator with sending the waste directly to landfill, without first being bio-stabilised, e.g. via an appropriate Mechanical Biological Treatment (MBT) process.
13. Highlighting the relative impacts of incineration and of sending waste to MBT prior to landfill, DEFRA's Waste Economics Team noted that: "*MBT-landfill provides the best emissions performance in terms of the treatment/disposal of residual waste. It essentially involves landfilling somewhat stabilised wastes with some material recovery. The magnitude of the environmental impact depends on the extent to which the waste is stabilised*".<sup>3</sup>
14. Even when waste is sent directly to landfill (without appropriate pre-treatment), there are various factors that are sometimes overlooked in modelling exercises in terms of the carbon sequestration effects of landfilling waste.

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<sup>2</sup> DEFRA's "Energy from waste: A guide to the debate", February 2014 (revised edition), available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/284612/pb14130-energy-waste-201402.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf)

<sup>3</sup> DEFRA's "The Economics of Waste and Waste Policy", June 2011, available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69500/pb13548-economic-principles-wr110613.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69500/pb13548-economic-principles-wr110613.pdf)

15. As noted in the Government's aforementioned EfW Guide: *"...considering the landfill route, all the fossil carbon stays in the ground and doesn't break down. The fossil carbon is sequestered, as is potentially up to half of the biogenic carbon depending on the exact conditions in the landfill"*.
16. The impacts of biogenic carbon releases being avoided, sequestered or delayed in landfill compared to being immediately released as the result of incineration is erroneously omitted from some assessments of relative net emissions, and these omissions improperly favour incineration in such assessments.
17. On 3<sup>rd</sup> August 2015 Planning Inspector Mel Middleton decided to dismiss an appeal for a circa 140,000 tonne per annum incinerator proposed for the Former Ravenhead Glass Warehouse and other land at Lock Street, St. Helens, Merseyside WA9 1HS (Appeal Ref: 2224529, 'the Lock Street decision'). One of the issues material to the refusal was the poor *"carbon credentials"* of the plant - this was deemed to conflict with relevant local and national policies.
18. Paragraph 30 of the Lock Street decision states: *"In certain circumstances generating electrical energy from waste can contribute to carbon emissions to a greater extent than depositing the same material as landfill. It is therefore not a simple exercise to demonstrate that an EfW will have a positive effect on overall carbon emissions..."* (emphasis added)
19. Paragraph 19 of the Government's EfW Guide clearly states that: *"...residual waste also contains wastes from 'fossil' sources (oil etc.) such as plastic. Therefore when energy is recovered from mixed residual waste it is considered to be only a partially renewable energy source"*. (emphasis in original)
20. In January 2018 Resource Minister Dr Thérèse Coffey, responding on behalf of the Department for Environment, Food and Rural Affairs (DEFRA) to a Parliamentary Question made clear that: *"A comparison of the CO<sub>2</sub> impact of waste going to energy from waste and landfill is included in the analysis of the 2014 report 'Energy recovery for residual waste: A carbon modelling based approach'. No formal analysis has been undertaken since this report was published"*.<sup>4</sup>

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<sup>4</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-01-22/124194/>

## Climate Change Impacts of the Proposal

21. It is noteworthy that the applicant has not followed the methodology set out in 'Energy recovery for residual waste: A carbon based modelling approach' and does not justify their choice to deviate from the central assumptions of the Government-based approach.
22. UKWIN notes Paragraph 2.20.1 of Volume 1 Chapter 2 of the applicant's Environmental Statement (ES) explains that: *"A greenhouse gas assessment of the proposed thermal treatment facility, based on an estimate of its operational carbon footprint has been undertaken and is included at Appendix 2.3"*. UKWIN also notes that the Appendix 2.3: Carbon Assessment is in fact a report that was *"prepared to accompany the 2016 application"*.
23. The analysis contained within Appendix 2.3 fails to adequately set out all of the assumptions and methodologies applied and all of the underlying data and associated justifications for using those assumptions and methodologies.
24. Furthermore, some of the statements made within Appendix 2.3 appear to be contradictory, confused, and/or simply out-of-date.
25. If some of the omissions in the assessment are corrected then it appears that the development would have a significant adverse GHG impact, and therefore either additional information should be sought from the applicant or the application should be determined on the basis that climate change benefits have not been demonstrated and significant adverse change impacts have not been ruled out.
26. In relation to errors, it appears that the applicant and their consultants made a simple 'unit of measurement error' that results in an overstatement of emissions avoided through reduced transport by a factor of one thousand, i.e. the applicant's figure of 110,315 kilograms per annum was erroneously treated as if it were 110,315 tonnes per annum.
27. At Paragraph 9.6 of the applicant's 2016 Carbon Assessment the applicant adopts a '0.70' conversion factor, stating: *"Therefore the impact of the 3R Facility is to reduce vehicle-Kilometers by 157,140 Km per year, and from the Department of Energy & Climate Change standard set of GHG conversion factors 2016 for all HGVs (diesel), the CO2 conversion factor is 0.702022 per Km"*.
28. The unit of the 0.70 CO2 is not stated by the applicant, but if one goes back to the DECC source document it is noted to be 0.70 kilograms of CO2e per kilometre.

29. To quote the DECC spreadsheet: *"All conversion factors presented here are in units of 'kilograms of carbon dioxide equivalent of Y per X' (kg CO<sub>2</sub>e of Y per X), where Y is the gas emitted and X is the unit activity. CO<sub>2</sub>e is the universal unit of measurement to indicate the global warming potential (GWP) of GHGs, expressed in terms of the GWP of one unit of carbon dioxide".*
30. As per DECC's source spreadsheet, the standard set conversion factor cited is 0.70kgCO<sub>2</sub>e/km (equating to only 0.0007tCO<sub>2</sub>e/km), but the applicant appears to be working on the basis that the factor is expressed in tonnes (0.70tCO<sub>2</sub>e/km), which is one thousand times higher than DEC's actual figure.
31. This means that the result of applicant's calculation of 157,140km x 0.70 is actually 110,315 kilograms of CO<sub>2</sub> avoided per annum, i.e. only 110 tonnes of CO<sub>2</sub> per annum. However, Table 3 of the 2016 Carbon Assessment uses the 110,315 kilogram figure as if it were 110,315 tonnes rather than 110 tonnes.
32. Over the expected lifetime of the plant this mistake with transport emissions adds up to overstating avoided emissions by more than **2.75 million tonnes of CO<sub>2</sub>** ((110,135 - 110) x 25).
33. In relation to inconsistencies, Paragraph 5.3.6 of the applicant's 2016 Carbon Assessment (Appendix 2.3) talks about *"21 MW recovered as electricity and exported to the grid at a net efficiency of **28.4%**".* This is clearly not consistent with Paragraph 8.4 of the Planning Supporting Statement, which states that *"18 MW would be available for export to the national grid".* (emphasis added)
34. Another inconsistency is that the Executive Summary of the Planning Statement says that the proposal involves: *"Generating 21Mw of renewable energy to be transported to the local distribution network"* which, based on statements that the gross generation capacity is 21MW, implies that 100% of the feedstock (and therefore 100% of the energy) would be renewable, whereas the composition in Table 1 of the 2016 Carbon Assessment states that the feedstock would include non-renewable fossil-based material such as plastic.
35. The applicant has not explained how they get from the energy content of their proposed feedstock composition to their claimed level of electricity export.
36. Their claimed composition in Table 1 of the 2016 Carbon Assessment includes a high proportion (44.75%) of putrescibles which tend to contain less energy than high-calorific value (CV) feedstocks such as plastic.

37. As Footnote 31 of the Governments' EfW Guide notes: *"Some wet [i.e. putrescible] wastes e.g. food are not particularly suitable for energy from waste"*.
38. The following assumptions have been adopted in order to attempt to reconcile these inconsistencies for the purpose of producing an indicative, partially corrected, version of the applicant's Table 3 'Summary of estimated emissions (tCO<sub>2</sub> equivalent per annum)':
- a. The properties of the feedstock (e.g. calorific value, proportion of biogenic carbon, etc.) are assumed to be those set out in the Government's 'Energy recovery for residual waste: A carbon based modelling approach', using the input waste composition data given by the applicant in Table 1 of their 2016 Carbon Assessment; and
  - b. The applicant's 28.4% efficiency figure (based on generation of 21 MW) is for gross efficiency, and their 18MW export figure implies a net efficiency of 24.3%; and
  - c. The applicant's assumed 44.75% of putrescibles in the feedstock would be comprised of garden waste; and
  - d. As the assessment is intended to examine the impact of incineration versus landfill, the model below assumes that material recovery would occur irrespective of the final treatment option (and therefore the -37,684 figure for 'Materials Recovery' has been excluded from the calculations).
39. If one were to consider the impact of Materials Recovery then the correct approach would be to use a counterfactual of MBT-Landfill, which would not only recover recyclables prior to landfill but which would also bio-stabilise the waste sent for landfill and therefore reduce the emissions of methane from landfill and increase the 'biogenic carbon sink' benefit of landfill.
40. This would result in the proposal performing even worse than landfill than is shown in the partially corrected modelling below.
41. Indeed, given the high quantity of putrescible waste it would also be appropriate to include separately collecting this feedstock for composting and anaerobic digestion (AD) as part of an alternative treatment scenario.
42. The proposed facility's performance against a composting/AD counterfactual would be even worse than comparison with MBT-Landfill.

43. In addition to the errors set out above, and in addition to inconsistencies in relation to both efficiency and uncertainties regarding composition highlighted above, we would like to draw attention to two further significant problems with the applicant's 2016 carbon assessment, as follows:
- a. The incorrect marginal emissions factor (MEF) is used; and
  - b. The biogenic carbon sequestration benefits of landfill are not accounted for.
44. Paragraph 6.2 of the 2016 Carbon Assessment states that the modelling assumes a 2016 conversion factor of 0.41205 kgCO<sub>2</sub>e/kW, which in Table 3 is multiplied by 168,000 kWh to provide displaced electricity generation of -69,224.
45. Applying the 2016 conversion factor is not consistent with the most recent Government guidance from December 2017.
46. As explained in DEFRA's 'Energy recovery for residual waste: A carbon based modelling approach' (February 2014): "...we should use the marginal energy mix which represents the carbon intensity of generating an additional kW of electricity..." (emphasis added)
47. Footnote 29 of the Government's 2014 EfW Guide states that: "*When conducting more detailed assessments the energy offset should be calculated in line with DECC guidance using the appropriate marginal energy factor*". (emphasis added)
48. The DECC guidance has now been taken up by BEIS, DECC's successor. The appropriate marginal energy factor (MEF), i.e. the generation-based long-run MEF, is provided in BEIS' Green Book supporting data tables.
49. According to Table 1 of the Green Book's supporting data tables (Department for Business, Energy & Industrial Strategy (BEIS), December 2017), the generation-based long-run marginal emissions factor for new energy generation facilities entering commissioning in 2020 is 0.270 kg CO<sub>2</sub>e/kWh and the 2020 generation-based grid average is 0.181kg CO<sub>2</sub>e/kWh.
50. When the Government's 0.270 kg CO<sub>2</sub>e/kWh MEF for 2020 is applied, with an assumed net efficiency of 24.3% alongside using an energy input (of around 2.58 MWh/t) based on the applicant's Carbon Assessment Table 1, then the applicant's -69,224 figures becomes **-30,474 tCO<sub>2</sub> equivalent per annum** (i.e. 180,000 tonnes x 2.580427 x 0.243 x 0.270).
51. In addition to using the correct MEF, the comparison should also properly account for biogenic sequestration in landfill.

52. Whilst the applicant assumes that half of the biogenic carbon is sequestered in landfill, and whilst the applicant uses this assumption to reduce the assumed quantity of methane released from landfill, the applicant fails to follow best practice by neither crediting landfill with 'negative emissions' for this sequestered biogenic material nor including the additional release of this biogenic carbon on the incineration side of the equation.

53. As noted in the evidence-based recommendations of Eunomia's 2015 report entitled 'The Potential Contribution of Waste Management to a Low Carbon Economy': *"All lifecycle studies engaged in comparative assessments of waste treatments should incorporate CO2 emissions from non-fossil sources in their comparative assessment"*.<sup>5</sup>

54. Eunomia's report also explains that: *"In comparative assessments between waste management processes, it cannot be considered valid to ignore biogenic CO2 emissions if the different processes deal with biogenic CO2 in different ways..."*

55. As stated at Paragraph 18 of DEFRA's 'Energy recovery for residual waste A carbon based modelling approach' (February 2014): *"...some biogenic carbon that would be released in energy recovery is sequestered in landfill"*.

56. DEFRA's document goes on to explain, at Paragraphs 171-173, how: *"...the model assumes that not all of the biogenic material decomposes in landfill but it is all converted to CO2 in energy from waste. Landfill therefore acts as a partial carbon sink for the biogenic carbon. This is a potential additional benefit for landfill over energy from waste. There are two ways to account for this additional effect:*

- *Estimate the amount of biogenic carbon sequestered and include the CO2 produced from the same amount of carbon in the EfW side of the model (or subtract it from the landfill side)*
- *Include all carbon emissions, both biogenic and fossil on both sides of the model*

*While both approaches would address the issue of sequestered biogenic carbon the first would potentially be the better solution as it would avoid double counting carbon with other inventories." (emphasis added)*

57. When the biogenic sequestration in landfill is taken into account, using the same waste composition data as above and the same MEF of 0.270 as above, the

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<sup>5</sup> <https://zerowasteurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/>



applicant's -76,505 figure for Landfill Diversion becomes **-3,892 tCO<sub>2</sub> equivalent per annum**.

58. It should be noted that the -3,892 tCO<sub>2</sub>e/annum figure is derived using the central assumptions from DEFRA's Carbon Based Modelling Approach, e.g. in relation to landfill gas engine efficiency.

59. Correcting these issues has a material impact on the conclusions of the carbon modelling that should weigh heavily against the proposal in the planning balance.

60. These adjustments are summarised in the Partially Corrected Table 3 below:

**Partially Corrected Table 3**

<b>Emissions Source</b>	<b>Proposed Facility Electricity only (uncorrected)</b>	<b>Proposed Facility Electricity only based on 24.3% net efficiency (partially corrected)</b>
<b>Process</b>	+50,955	+50,955
<b>Transport</b>	-110,315	-110 <sup>[i]</sup>
<b>Avoided CO<sub>2</sub></b>		
<b>Displaced Electricity Generation</b>	-69,224	-30,474 <sup>[ii]</sup>
<b>Materials Recovery</b>	-37,684	Not applicable <sup>[iii]</sup>
<b>Landfill Diversion</b>	-76,505	-3,892 <sup>[iv]</sup>
<b>Total</b>	-242,773	+16,479

[i] Corrected to account for the applicant's 'unit of measurement error', as explained in Paragraphs 26 - 32 above.

[ii] Corrected to apply an assumed net efficiency of 24.3% while applying the correct MEF of 0.270 (rather than the applicant's 0.412 conversion factor)

alongside using an energy input based on the applicant's Carbon Assessment Table 1, as explained in Paragraphs 33 - 50 above.

[iii] As per Paragraph 38 (d) above.

[iv] Corrected to account for biogenic sequestration in landfill (applying assumption's from DEFRA's Carbon Based Modelling Approach), as explained in Paragraphs 51 - 58 above.

61. Therefore, based on a partially corrected version of the applicant's own estimated emissions scenario, sending the waste to the proposed incineration facility would be **16,479 tcO2e per annum worse** than sending that same waste directly to landfill.

62. Other problems that we have observed in relation to the applicant's 2016 carbon assessment include:

- a. the transport assumptions (which appear to overstate the benefits of incineration, and which do not take account of diesel vehicles being replaced with electric vehicles during the lifetime of the proposed facility); and
- b. the landfill gas engine efficiency (which appear to overstate the benefits of incineration).

63. As should be clear from the issues raised above, the conclusions of the applicant's 2016 carbon assessment cannot be relied upon to provide an accurate description of the likely environmental impacts of the proposal.

64. Problems inevitably arise from the applicant's fundamental failure to correctly follow an accepted methodology applying a set of justified assumptions. We hope that these problems will be resolved as part of any revised climate change assessment required of the applicant by the WPA.

65. Alternatively, we would expect the WPA to determine the application on the basis that the proposal would contravene the strategic objective to minimise carbon emissions, and would therefore go against Waste Local Plan SO 14 as well as other local and national plans and policies in relation to carbon emissions and climate change.

## R1 Planning Condition

66. ES Volume 1, Chapter 2 states: *"2.4.18 The efficiency of the facility determines the remaining energy available for export. It is not possible at this stage to state what the exact efficiency would be, but it would be more than sufficient to meet the energy efficiency requirement for a recovery facility of 0.65 set out in the Waste Framework Directive (2008/98/EC). In consequence the facility would qualify as "recovery" under Article 3 of the Directive."*
67. The facility proposed for Horsham should, if granted planning consent, be given a Design Stage R1 Planning Condition in line with previous decisions by the Secretary of State and other local authorities to promote movement of waste management up the Waste Hierarchy, in line with local and national policies.
68. Appendix A of the National Planning Policy for Waste sets out a five-step waste hierarchy, with the bottom tiers being 'Other Recovery' followed by 'Disposal'.
69. The accompanying footnote states that: *"The full definition of each level of the waste hierarchy is set out in Article 3 of the revised Waste Framework Directive (2008/98/EC)".*
70. As set out in the Government's EfW Guide and as elaborated upon in further detail in the European Commission's *'Guidance on the interpretation of key provisions of Directive 2008/98/EC on waste'*, inefficient Energy from Waste (EfW) plants are classified as 'Disposal' at the bottom of the Waste Hierarchy rather than as 'Other Recovery', even in cases where some energy is generated.
71. UKWIN draws the WPA's attention to the Secretary of State imposed Condition 16 for the Bilsthorpe Energy Centre (PINS Ref. 3001886).
72. That condition states: *"Prior to the development hereby permitted being brought into use, the operator shall submit to the Waste Planning Authority for approval in writing, verification that the facility has achieved [Design] Stage R1 Status through Design Stage Certification from the Environment Agency. The facility shall thereafter be configured in accordance with these approved details. Once operational, alterations to the processing plant may be undertaken to satisfy Best Available Technique or continued compliance with R1".*

73. Indeed, it is currently a matter of course to impose Design Stage R1 Planning Conditions. For example:

- a. **Birmingham City Council** - Rolton Kilbride's 105ktpa gasification plant at Castle Bromwich. Condition 32 of 2015/09679/PA.
- b. **West Sussex County Council** - Grundon's Circular Technology Park. Condition 24 of WSCC/096/13/F.
- c. **Warwickshire County Council** - Rolton Kilbride's Hams Hall gasification plant - Condition 21 of NWB/16CM011
- d. **Bradford City Council** - Endless Energy Ltd's 90ktpa RDF plant in Keighley. Condition 45 of 16/06857/FUL.
- e. **Selby District Council** - Kingspan's 132tktpa RDF plant in Sherburn in Elmet. Condition 23 of 2016/1456/EIA
- f. **Nottingham City Council** - Chinook Sciences' 160ktp plant in Bulwell. Condition 20 of 13/03051/PMFUL3

### **Previous UKWIN Comments on Planning Committee Report**

74. UKWIN draws the WPA's attention to UKWIN's comments made in relation to Application Reference: WSCC/062/16/NH in general, and in particular the comments from UKWIN's Technical Adviser Tim Hill C Eng made on 30<sup>th</sup> January 2017 and 8<sup>th</sup> June 2017 as follows:

- a. *Referring to the Planning Statement Appendix G Carbon Assessment, the Applicant has (a) failed to make available supporting calculations setting out the carbon effects of start up fuel and imported electricity / electricity generated within the plant, and (b) assumed that electricity generation emission avoided by production of electricity at the proposed ERF is 0.41205 kgCO<sub>2</sub>e/kWh electricity generated. This is incorrect...*
- b. *The applicant's analysis presents a misleading picture and until the aspects above have been taken account of and included, it cannot be assumed that the proposed facility represents an improvement over landfill.*
- c. *The applicant has failed to clarify the basis on which their net overall energy efficiency figure. The applicant should be asked to make available (i) an Energy flow Sankey diagram and (ii) a heat flow diagram.*
- d. *...I note that, in relation to Paragraph 4.20 of the Planning Officer's report, the statement that: "The Environment Agency would control the efficiency of*

*the facility to ensure that the process qualifies as 'recovery' (in accordance with the R1 formula, referred to in representations) and to optimise the amount of electricity available for export outside of the facility." is fundamentally flawed. The Environment Agency (EA) does not control the efficiency of a waste incineration facility. Based on the relevant design data that should have been submitted by the applicant as part of the planning application, and any further information that would be required by the EA as part of a bespoke R1 application, the EA will indicate if the proposed incinerator can be expected to achieve an R1 value of 0.65 (recovery status) or (if less than 0.65) it retains its disposal status. The planning committee should, prior to the Tuesday 18 July 2017 meeting, be made aware that, if minded, notwithstanding the planning officers recommendation to refuse, to consent, then a condition should be set to the effect that consent is dependent on the EA deciding that, based on the design data, an R1 value of 0.65 or greater can be expected.*

## **UKWIN Comments on the Applicant's Air Quality Assessment**

75. UKWIN notes that Table 7.8: Mass Emissions from the applicant's Environmental Statement (ES) Volume 1, Chapter 7 on Air Quality and Odour appears to omit figures for total organic carbon (TOC) despite the fact that emissions are limited by the Industrial Emissions Directive (IED) and despite the fact that the applicant themselves include benzene as a main air pollutant (e.g. at Paragraph 7.2.18).
76. UKWIN urges the WPA to ask the applicant to provide TOC data, expressed as benzene (i.e. assuming all TOC is benzene), in accordance with standard practice and with IED requirements and with the relevant requirements of Environmental Impact Assessment legislation.
77. In relation to the applicant's attempt to assess emissions associated with a 'worst case scenario' UKWIN draws attention to Paragraphs 7.2.4 and 7.3.39 of the applicant's ES Volume 1, Chapter 7.
78. Paragraph 7.2.4 states: "For the purposes of this assessment for those pollutants having only one emission limit (for a single averaging period), the facility has been assumed to operate at that limit".
79. Paragraph 7.3.39 states: "As there are 8,760 hours in a non-leap year, the hourly-mean concentration would need to be below 200 µg.m<sup>-3</sup> in 8,742 hours, i.e. 99.79% of the time".

80. It should be noted that the limits set out in 'Table 7.1: Relevant Industrial Emission Directive Limit Values' can be exceeded not only during start-up and shut down but also during normal operation.
81. The standard way that the Environment Agency (EA) would assess monitored emissions against the Emissions Limit Values (ELVs) is to subtract the uncertainty of the measurement from the value and to compare this lower figure against the ELV.
82. This means that the greater the level of uncertainty the lower the assumed emissions when compared to the ELV. Subtracting uncertainty in this way would imply that actual emissions could exceed the ELV by a greater margin than is allowed for by the applicant in their 'worst case scenario' assessment, e.g. by twice the 'uncertainty budget' allowed for under the ELV.
83. As such, the applicant's proposed 'worst case' scenarios could be significantly underestimating the potential permitted emissions from the plant.

11 Cottage Close  
Horsham  
West Sussex  
RH12 4GS

22 April 2018

Dear Sirs

**Objection to the Britaniacrest Incinerator**

As a long term resident of North Horsham I wish to add my name to those objecting to the plans for the Britaniacrest Incinerator.

Whilst I support efforts to increase recycling and reduce landfill I am dismayed that this planned incinerator will be so close to the large and rapidly expanding residential area of Horsham.

As a grandparent of young children also living in the town, I am concerned about the potential increase of pollutants in the air that this installation and the increased HGV traffic attending it will cause. This cannot be good for the health and development of children of any age.

Please don't let the pursuit of profit damage our environment or the reputation of this historic town.

Yours faithfully,

A black rectangular box redacting the signature of Elizabeth Hartley.

Elizabeth Hartley.

The Barn  
Mayes Lane  
Warnham  
RH12 3SG

18<sup>th</sup> April 2018

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester PO19 1RH

Attention: Planning

As residents of Warnham parish we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Warnham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

**Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

**Light Pollution**



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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

The stack is 95m to take the pollution away but where does it land?

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps.

The site sits in a bucket location, lower ground, surrounded by hills which could cause the emissions to remain locally.

Yours sincerely



Ref.

WSCC/015/18/NH

4 Widgeon Way

Horsham

RH12 2LX

21/4/18

Dear Sirs,

I wish to register my strong objection to an incinerator, for all the reasons which were given last year, when Planning Officers turned down the application. Nothing has changed!

Yours sincerely



The Chief Planning Officer  
County Planning  
West Sussex County Council  
County Hall  
Chichester  
Sussex PO 19 1RH

From Mrs M.A.W. BLAKE - DYKE  
SLERE COTTAGE  
CHURCH LANE  
SOUTH MALLING  
LEWES  
BN7 2SA

25<sup>th</sup> April 2018

Dear Sir

land at former Wealden Brickworks, Langhurstwood  
Road Horsham. Application no WSCC/015/18/NH

I would refer to the above pending Planning Application which would appear to be very similar to Planning Application No WSCC/062/16/NH which the applicants withdrew. The objections I raised then still stand.

I own, jointly with others, property at Pondtail Farm, situated on Langhurstwood Road between the site of the proposed incinerator and the A264 Horsham Northern By Pass. My family purchased the farm in May 1945 and the character of Langhurstwood Road has changed very little over the period of my family's ownership. It is a country road quite unsuited to the amount of traffic it is now expected to carry. In addition to the large lorries carrying waste to the landfill and existing incinerator and the traffic going to the business premises at Langhurst it is used as a cut through by traffic to avoid the slow portion of the A24 lying between the roundabout at the western end of the Horsham Bypass A24/264 and Capel. We had a horse run into by a motor cyclist outside Graylands at 8am in the morning overtaking a large lorry which had stopped for the horses - it's leg was broken and it had to be put down. This was in 2006 and the traffic has increased since then. It is now very difficult to move animals along this road as it is dangerous as it is also for pedestrians. I note the Highway Report and the

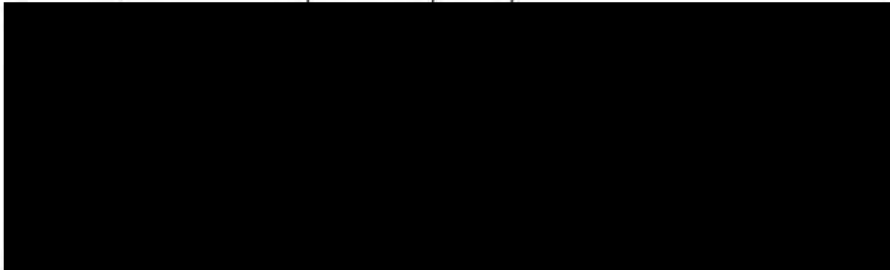
increased traffic movements, well the road is just not up to it. I also note there are supposed to be restrictions at weekends, bank holidays etc - but who is going to police this?

This proposed development cannot even be contemplated until the stretch of road between the site and the A 264 is substantially improved.

In addition, the surrounding area "Northern Hornham" is going to be substantially developed in the next 5-15 years - mainly residential - and this type of development will just not be suitable. The proposed chimney 95 metres high (over 300 feet) will dominate the area and there is always the danger of accidents and fumes spreading over residential areas, putting the health and well being of local residents at risk.

Taking all the above into account this application should be refused.

Yours faithfully



Sheila M. Young  
20, Shepherds Way  
Horsham  
RH12 4LS

County Planning  
West Sussex County Council  
County Hall  
Chichester  
PO 19 1RH  
9<sup>th</sup> April, 2018

Dear Sirs,

Ref:- WSCC/015/18/NH

I wish to register my protest against the newly proposed Britaniacrest Incinerator on the grounds that:-

- . More transportation by HGV's across county borders to a new Incinerator, will cause not only an increase in air pollution (Co2 & noxious emissions.) but add also to the volume of traffic and ultimately more road maintenance, on already over- subscribed roads.
- . CO2 levels increased by incineration will damage health and the environment.
- . The World Health Organization advises that areas near an incinerator should not be populated. Proposed site for 'new' incinerator will be adjacent to the North Horsham Development and near to existing conurbations.
- . With increased recycling in this area being encouraged, the need for a further incinerator is unnecessary.
- . The increase in the height of newly proposed chimney from 28m to 95m., on top of an incinerator building of 36m in height, will necessitate a permanent aircraft warning light.

Yours sincerely,



S.M.Young. (Mrs)

4 Redwing Close

Horsham

West Sussex

RH13 5PE

23/4/18

Ref:- WSCC/015/18/NH Britaniacrest incinerator.

We strongly object to Britaniacrest plans for the building of an incinerator for the following reasons :-

- 1) During the formulation of plans for the future of this district a conscious decision was made to reject incineration in favour of re-cycling. A Biological Treatment Facility part funded by the tax payer is in operation and existing contracts have some 18 years left to run. The introduction of an all consuming incinerator will cut across set aims of re-cycling and will be a betrayal of the good people of Horsham.
- 2) The proposed incinerator, with maybe the exception of a few jobs, will provide no benefit to this area. This is a private operation purely run for profit achieved through the burning of vast tons of waste materials. In order to keep the plant fed it will be necessary to import waste materials from far and wide. This will require hundreds of lorry movements per day which will inevitably cause additional air pollution, increased traffic congestion and damage to road surfaces.



- 3) Plans For this area which are being acted upon require the building of thousands of houses in the region of the site in question. The World Health Organisation advises that areas near a waste incinerator should not be populated. Developers who have considerable investments in construction will find associated values diminish and therefore less attractive to invest further.
- 4) As the area will become a less desirable location much future revenue will be lost. The momentum for building houses will be under threat as property and land values become effected. People will not want to come and live in the shadow of a monstrous 95m high chimney emitting a giant plume which will be seen for miles around.
- 5) Because such incinerators have only been in operation for a relatively short period of time health indicators are inconclusive. However, very few will try to argue on the grounds of health benefits. Those who do are no doubt the same voices advocating the purchase of diesel vehicles. It is a fact that respiratory conditions such as Asthma and C.O.P.D are on the increase and existing and future sufferers will not appreciate the introduction of additional pollution that will be generated from this overall activity.
- 6) It is plain this is the wrong technology in the wrong place at the wrong time. We respectfully submit that this application be rejected.

MR A Fisher.-

Mrs K Fisher.-

KEITH TAYLOR  
Green Party  
*for the South East of England*



26 April 2018

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester  
PO19 1RH

Dear Planning Office,  
Dear West Sussex County Council,

**Re: Horsham Incinerator (WSCC/015/18/NH)**

I am writing to you to object to the incinerator planned for Horsham.

The community in Horsham fought an incinerator in the early 2000s, another application last year and is facing the same fight again today. It was as a direct result of the campaign against the incinerator plan in the early 2000s which saw investment in a Mechanical & Biological Treatment facility at the Brookhurst Wood site. That facility provided West Sussex with an additional waste processing capacity of 310,000 tonnes per annum.

Like many of my constituents, I am concerned that this latest proposal is for a commercial incinerator with a huge capacity – 180,000 tonnes per annum. There is no guarantee that locally produced waste would be processed and an understanding that industrial waste materials could be processed from across the southern counties.

The size of the plant as much as its capacity are a point of concern. Industrial buildings will tower above the treeline and rural site, while the character of the Horsham and Warnham areas will be harmed. I would also like to take this opportunity to remind the local planning authority that the application site lies within 5km of a nearby Area of Outstanding Natural Beauty. It is no accident that Members of the Friends of Warnham Local Nature Reserve have expressed concerns, which I share, about the environmental effects of discharges from the proposed incinerator on the Nature Reserve and its 400 species of plants, 100 species of bird and 21 species of dragonfly.<sup>1</sup>

While an understanding has been provided in the proposals of the incinerator's impact on local wildlife, including existing wild and protected species' use of the site, what is less clear is the impact of emissions on habitats and biodiversity. I am deeply concerned about the harmful emissions from the incineration processes on site and worry that assessment of the emissions have been carried out miles away from the site, not on the site. Heavy metals, acidic gases and poisons will be emitted in an area with high populations, with a nursery (Little Barn Owls) and primary school (Holbrook) in the locality. Although the flooding assessment states that flooding incidents on site are non-existent, I am not alone in expressing concerns about toxic waste leaching into the soil and its potential impacts on freshwater sources such as the Ardingly, Wierwood and Bewl Water reservoirs. The potentially devastating impact on local farmland and livestock doesn't seem to have been properly assessed either.

As such, the proposal stands in direct contradiction to the stated aims of the West Sussex Waste and Minerals Plan which stipulates that the health of residents will be protected.

Liberty, developers behind the North Horsham Development (over 2,000 houses and schools), this week also took the view in their objection that the planned incinerator would have adverse effects

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<sup>1</sup> <http://www.warnhamnaturereservefriends.org.uk/>



on visual amenity and raised concerns about its noise pollution impacts. Liberty has also claimed that mitigating measures such as the planting of trees will take at least 15 years to fully establish, too long a time to provide adequate reduction in the severe impact local residents will experience.

If the incinerator is given the go-ahead, attention will be diverted from waste reduction, recycling, reuse, anaerobic digestion, composting and other more creative solutions which could lead us toward a "zero waste" outcome by 2050, if not sooner. The focus on incineration will kill off those good intentions. Moreover, there is overcapacity in incineration in the South East and already there is not enough waste to feed the incinerators currently planned and in use in the UK.

Just last week, Members of the European Parliament voted on the EU's Circular Economy Package to take another step towards a truly sustainable European economy. Estimates suggest that the circular economy could boost the European economy by as much as €1.8 trillion by 2030. It also has the potential to unlock huge job creation. It is estimated that for every 10,000 tons of waste, 36 jobs can be created if it is recycled, and up to 296 if it is reused - compared to one job in case of incineration or six jobs in case of landfill.<sup>2</sup> It is hugely disappointing, therefore, that rather than embracing the circular economy and its job creating potential, West Sussex is proposing to take a huge step backwards by embracing waste incineration.

I back the aims of the cross-party Early Day Motion to place a moratorium on new incinerators, co-tabled by my Green colleague Caroline Lucas MP in the House of Commons. Amongst others, progressive MPs across the political spectrum acknowledge that in the UK there is now more waste incineration capacity built and under construction than it is forecast there will be genuinely residual combustible waste to burn. Furthermore, they acknowledge the need to send a clear message that the waste hierarchy should shift focus away from incineration and towards waste reduction, reuse, recycling and composting; and calls on the Government and the devolved governments to introduce a complete moratorium on new waste incineration capacity.<sup>3</sup>

Where the most sustainable waste management approaches can't meet demand yet, increasing landfill capacity would be preferable to this medium/long term commitment to incineration and would be more consistent with the Waste Hierarchy in the Waste Framework Directive (2008/98/EC)<sup>4</sup> than what is currently being proposed. This is manageable and reversible in a way that establishing an incineration programme is not.

Notwithstanding my opposition to any increase in incineration, I would like to point out that even if this incinerator is approved, there is still no guarantee that local authorities would actually use the Britaniacrest incinerator. If planning is permitted the owners of this commercial incinerator would have to negotiate waste tonnage prices with anyone wanting them to burn their waste so WSCC may opt to transport waste out of the county, as it currently does.

In conclusion, I urge you to reject this planning application and instead increase recycling targets and prioritise strategies to improve capacity for recycling and waste reduction.

Yours sincerely,



Keith Taylor, Green MEP, South East England.

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<sup>2</sup> <https://www.greens-efa.eu/files/doc/docs/6706d1f76fbd7dafb124f5f9ce88d7dc.pdf>

<sup>3</sup> <https://www.parliament.uk/edm/2017-19/581>

<sup>4</sup> <http://ec.europa.eu/environment/waste/framework/>

177. Buckwood Drive

Gossops Green

Crowley. W. Sussex

RH11. 8PU

23<sup>rd</sup> April 2018

The Chief Executive

West Sussex County Council

The County Hall

Chichester

W. Sussex

26 APR 2018  
WEST SUSSEX  
COUNTY COUNCIL

Dear Sir

Ref: WSEC/015/18/NH

I object most strongly to the plan by Britannicrest, Plan to build an incinerator at Wealden Brickworks near Horsham, together with a monstrous 95m (300ft) chimney.

The location is totally out of keeping with this once beautiful area of Sussex which is suffering from overbuild and congestion at present.

Faygate, Crawley and Horley and all new build estates lie directly in the fall-out area from the plant with the prevailing West to South West winds driving waste completely over the area.

The idea is madness.

Yours sincerely

[Redacted Signature]

(FeioB Rtd)

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**From:** Ian Agnew  
**Sent:** 26 April 2018 18:05  
**To:** PL Planning Applications  
**Subject:** Planning Application Ref: WSCC/015/18/NH - Industrial Incinerator

Dear Sirs

FAO: Planning Department

As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

## **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

## **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Yours faithfully

Mr & Mrs Ian Agnew



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.

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**From:** Darren Robins  
**Sent:** 26 April 2018 12:20  
**To:** PL Planning Applications  
**Subject:** WSCC/015/18/NH

Please see detailed below my OBJECTION to the above mentioned planning application.



I wholly OBJECT to application nr WSCC/015/18/NH as detailed below:-

**The proposals for an incinerator does not meet WSCC waste plan**

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

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) consider 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.

This incinerator clearly does not meet this requirement.

**Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height. The proposed chimney at 95m will be taller than big bens and the Statue of Liberty! The building will be bigger than Horsham's shopping centre, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposer's own submission, it will be seen as far as Box Hill.

**Light Pollution**

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

**Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London. The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial. Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources. NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on-going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

### **Compensation**

There is no offer of compensation for noise and light pollution to the surrounding communities.

There is no compensation being offered to those whose home will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

### **UK Cross Party Political oppose incineration**

UK Win are behind the political cross party Early Day Motion (581)\* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK, but this legislation will come way too late for West Sussex.

Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

\*<http://www.parliament.uk/edm/2017-19/581>

European Commission (EC) calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing out support for mixed waste incineration. (29 January 2018). 'The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs..... EfW process

– must be redefined to ensure that increases in recycling and reuse are not hampered, and that overcapacities for residual waste treatment are not created.

Long-term circular economy perspective - The EC's communication reads: 'In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy...

'Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators.

..... For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.' <https://resource.co/article/european-commission-warns-incineration-could-hamper-circular-economy-11632#.Wshl2EnzwLA.mailto>

### **Local Community**

It is highly likely that young people currently living in Horsham will look to move away to raise young families. Young families looking to settle down are also highly unlikely to see Horsham as unviable considering the risks associated with living near a facility of this nature and magnitude. What impact might this have on the North Horsham development with houses/school etc all currently planned for construction!!!

### **Conclusion**

This application must be refused on many ground with the overriding factor being the impact it will have on the local community and future development of the Town.

Darren Robins  
Commercial Manager



We are pleased to announce the launch of our brand new website featuring some case studies and a portfolio of images  
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Follow us also on [LinkedIn](#) and [Instagram](#)

Landbuild Ltd  
The Colonnades, London Road,  
Pulborough, West Sussex. RH20 1AS



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**From:** Kathy Wiffen  
**Sent:** 25 April 2018 21:31  
**To:** PL Planning Applications  
**Cc:** Kathy Wiffen; Sam Dumbrell  
**Subject:** WSCC/015/18/NH  
**Attachments:** Incinerator view from The Granary MW2.pdf

## **OBJECTION**

I strongly object to the above planning application in its entirety due to numerous reasons:

### **Non-compliance with WSCC's Waste Local Plan**

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The application is to import business and commercial waste from far afield – it is not for local residential waste

**Strategic Objective 11:** *To protect and, where possible, enhance the natural and historic environment and resources of the County.* The application does not enhance the natural environment.

**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.....* the application will have an unacceptable impact due to its size and emissions

**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 application is unable to meet this policy on any of the stated criteria.

**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 application requires aviation lighting at over 90m high fully visible from our property and the stated noise increase in our road 24hr/day, 365 days/year means that it fails on both noise impact and lighting.

### **Visual Appearance**

The incinerator building and stack are enormous. I have attached a correctly scaled adapted photo to demonstrate how the plans will severely adversely affect the skyline and view from our house ref: "Incinerator view from The Granary MW2". Note this was for the first application which was withdrawn. Whilst the building has now been reduced in height it is only a minor reduction and will still be seen massively over the skyline year round

### **Noise**

The application states the background noise in Station Road where we live will be increased continuously. This is a rural location (see view above) and is unacceptable, especially at night and weekends. We live in a Grade II listed building and would be unable to install sound insulation, even if paid for by the applicant, due to Listed Buildings Consent to mitigate this noise increase.

### **Impact on Listed Buildings**

Our building is Grade II Listed circa 1650. Horsham District Council: Gypsy, Traveller and Travelling Showpeople Sites Study final report October 2011 states WAR003 "Land adjacent to Westons Place" was rejected as a potential traveller site for the reason that a *"Gypsy and Traveller development in this location would impact on the setting of Listed Buildings to the south west of the site."* This land in question is again the paddocks shown in the adapted photo in "Visual Appearance" above. It is clear that Horsham District Council have set a precedent to not impact these historical buildings which are protected for national heritage. This planning application will severely impact our historically significant building and others in the vicinity.

### **Blight**

In the 2000's our property, together with another 10 or 12, were impacted by WSCC plans for the A24 bypass. This significantly reduced the value of the properties. WSCC were taken to court where they lost and were forced to purchase all the affected properties and land at pre-blighted values. It is clear from the size of this incinerator building and stack that for reasons of visual and emission impact that if this application is allowed to proceed our home will once again be impacted by blight. If this should occur all costs associated with this will naturally need to be claimed from the applicant and WSCC as appropriate

### **Emissions and air pollution**

Public Health England has funded a new appraisal of research into the pollution effects of incinerators and was due for publication in spring 2017. Other incinerator projects that have been built or in the process of planning have received huge public outrage for the plants not meeting the criteria stated in the applications. These include increased infant mortality, decreased recycling in the locality due to recycled materials such as paper, cardboard and plastics being needed to be incinerated to keep the process hot enough and efficient enough. This is unacceptable. Horsham has an excellent record for recycling and this should not be impacted to allow a private company to profit. The emissions from this application will fall (as has been demonstrated by various stack plume CFD models freely posted on the internet) over our village, school and further afield over Crawley, Horsham and the 2750 house North Horsham Development which is on the verge of being built. Again this is completely unacceptable

## **Conclusion**

The development in this application is of a scale totally out of proportion to local demand, its rural location and countryside environment.

It does not meet the WSCC Waste local plan.

It will impact our family's quality of life from noise, emissions and light pollution.

It will negatively impact the value of our property and land leading to blight.

I object to the application and wish it to be refused in its entirety.

K Wiffen







<b>Application Number</b>	WSCC/015/18/NH	<b>Application Status/Decision</b>	Awaiting Decision
<b>Date Registered</b>			
<b>Date Valid</b>		<b>Date Received</b>	
<b>Council</b>	Horsham District Council		
<b>Parish\Town</b>	North Horsham	<b>Local Councillor</b>	Councillor for Holbrook Electoral Division
<b>Planning Case Officer</b>	Mrs Sarah Dumbrell	<b>Application Type</b>	County Matter Waste
<b>Development Size</b>	Major		
<b>Applicant</b>	Britaniacrest Recycling Ltd		
<b>Agent</b>	RPS Planning & Development		
<b>Site Name</b>	Former Wealden Brickworks		
<b>Location</b>	Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD		
<b>Proposal</b>	Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure		

## **OBJECTION**

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incinerated to keep the process hot enough and efficient enough. This is unacceptable. Horsham has an excellent record for recycling and this should not be impacted to allow a private company to profit. The emissions from this application will fall (as has been demonstrated by various stack plume CFD models freely posted on the internet) over our village, school and further afield over Crawley, Horsham and the 2750 house North Horsham Development which is on the verge of being built. Again this is completely unacceptable

## **Conclusion**

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It does not meet the WSCC Waste local plan.

It will impact our family's quality of life from noise, emissions and light pollution.

It will negatively impact the value of our property and land leading to blight.

I object to the application and wish it to be refused in its entirety.

Eur Ing M Wiffen CEng FIMechE

The Granary  
Station Road  
Warnham  
RH12 3SP





**From:** [Conrad Walker](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Horsham incinerator objection  
**Date:** 25 April 2018 07:01:08

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Dear Sir/Madam,

We would like to submit our objections to WSCC/015/18/NH.

This planning application is to build an incinerator in the beautiful village of Warnham. We are residents of Station Road, Warnham and we will be directly affected by this monstrous building and excessive chimney.

Our objections are listed;

1. This proposal is purely for commercial profit funded by a private company. We, the taxpayer, paid for the existing Biffa Mechanical Biological Treatment Facility in 2009 and rejected proposals for an incinerator. We feel that Horsham has contributed more than enough to the waste issue.

2. Waste to feed the incinerator will be transported by HGV's across our county borders, polluting our air with Co2 and Nox emissions. We have more than enough traffic in our county without consenting to industrial pollution.

3. Incineration increases Co2 levels which is damaging to our health and our wonderful environment.

4. We are being encouraged (and forced) to recycle more. Our refuse collection has reduced to fortnightly to limit the amount of waste we have collected. This is in spite of a massive increase to our council tax of 4.95% for 2018. This is disgraceful in itself considering we are paying more money for less services. The fact that the council is even considering this application is a complete contradiction to the recycling programme. MPs are already considering evidence that there are already too many incinerators in the UK so why on earth would we allow a private company to build something that there is no demand for and conflicts with the recycling goals of our country and our county?

5. The proposed chimney for the incinerator is 95m high. This is same height as Big Ben and 40m higher than Nelson's column! According to Britannia Crest, the height of chimney is out of their control and is being depicted by the Environment Agency. This indicates that the Environment Agency is greatly concerned that the fumes and pollution will affect our village of Warnham and Horsham town itself.

The chimney will also be lit 24hrs to ensure that

aeroplanes do not hit it. How dreadful is that. The fact it could put air passengers lives at risk and the effect on local residents quality of life should be enough on its own for this proposal to be rejected.

The incinerator building itself will be bigger and taller than Swan Walk. This will also be lit up 24hrs. I cannot object strongly enough to this absurd planning proposal.

6. The World Health Organisation advises that incinerators should NOT be build near populated areas. Horsham District is the 2<sup>nd</sup> largest Local Authority District in West Sussex and has a total population of **132,900**. This is a populated area and is yet another reason to reject this absurd application.

7. Horsham has regularly been identified as one of the best places to live in the UK. With this monstrous incinerator blighting our landscape and pumping pollution into the air I cannot see that this accolade will last.

This planning application is the wrong plan, on the wrong site, and should not be allowed to proceed.

Yours faithfully,

Mr C Walker & Mr N O'Dell-Rideout  
18 Station Road  
Warnham  
West Sussex  
RH12 3SR

Sent from my iPhone

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**From:** Ann Barber [REDACTED]  
**Sent:** 25 April 2018 08:34  
**To:** PL Planning Applications  
**Subject:** Planning Ref WSCC/015/18/NH

Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in Eversfield Road, Horsham and am writing to object to the above planning application.

The proposals for an incinerator does not meet WSCC waste plan for the following reasons:

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

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This incinerator clearly does not meet this requirement.

Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.



The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

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The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

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WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

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#### Recycling rates fall in half of local authorities as ...

[www.telegraph.co.uk](https://www.telegraph.co.uk)

Recycling rates have fallen in half of local authorities as councils are increasingly resorting to sending waste that has been carefully separated by families to incinerators to save money.

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#### Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

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## Permission granted for waste incinerator in Ford - BBC News

[www.bbc.co.uk](http://www.bbc.co.uk)

Permission is granted for a large waste incinerator to be built in Ford, by West Sussex County Council.

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## Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely

Ann Barber  
70 Eversfield Road  
Horsham  
West Sussex  
RH13 5JT

**From:** Nicholas Dann [REDACTED]  
**Sent:** 25 April 2018 11:17  
**To:** PL Planning Applications  
**Subject:** Objection to Planning application WSCC/015/18/NH

As a resident of Warnham I would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so I believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and will be seen from far and wide, including areas of outstanding natural beauty.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will become virtually redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and were told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

THANK YOU

Nicholas Dann

**From:** Nicholas Dann [REDACTED]  
**Sent:** 25 April 2018 11:18  
**To:** PL Planning Applications  
**Subject:** Objection to Planning application WSCC/015/18/NH

As a resident of Warnham I would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

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**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 enhance the natural environment.

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The building will be bigger than Horsham's shopping center, Swan Walk, and will be seen from far and wide, including areas of outstanding natural beauty.

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<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

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This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

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Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

THANK YOU

Rosie Dann





**Sussex**  
Wildlife Trust

**By email only**  
[planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)  
Attn: Mr Sam Dumbrell  
West Sussex County Council

Contact: Jess Price  
Direct Dial: 01273 497511  
E-mail: [swtconservation@sussexwt.org.uk](mailto:swtconservation@sussexwt.org.uk)  
Date: 26<sup>th</sup> April 2018

Dear Mr Dumbrell

Planning Application No: WSCC/015/18/NH  
Proposal: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure  
Location: Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex,  
RH12 4QD

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These comments are sent on behalf of the Sussex Wildlife Trust in relation to the above application. The Trust recognises that the site is allocated in the West Sussex Waste Local Plan. However we are concerned that the planning application does not deliver the requirements for protected species which are stipulated within the development principles for the allocation and as such we **object** to this application.

We have assessed the information contained in Chapter 12 of the Ecological Statement (ES), including appendices 12.1 and 12.2 and are concerned that the ecological value of the site for bats has not been appropriately considered. In particular, the only bat emergence survey was carried out in late October which is not in line with the Bat Conservation Trust's Bat Surveys for Professional Ecologists – Good Practice Guidelines. Indeed section 5.1.2 of appendix 12.1 Preliminary Ecological Appraisal states:

*'In accordance with BCT guidelines, it is recommended that a dawn / dusk survey is undertaken to establish the status of the building as a bat roost. The survey should be undertaken between May and August.'*

It is therefore unclear why the emergence survey was carried out in October rather than during the recommended period for structures with low roost suitability.

Additionally, numerous bat species have been recorded during surveys of the 'Land North of Horsham' allocated site in 2014 and 2015. At least seven species were recorded within 500 metres of the application site, whilst the highly protected Habitats Directive Annex II species Barbastelle bat was recorded within 1km of the site. The Trust does not feel it is appropriate to say in section 12.5.6 of the ES that only limited bat activity occurred on site and that it was focused on the railway boundary. Given that no other bat surveys were carried out, there is no independent evidence to support this statement.

The Sussex Wildlife Trust acknowledges that a lighting scheme has been suggested (ES appendix 2.2). However given the limited scope of the bat survey, we are concerned that there is no evidence to enable an informed evaluation of its suitability. For example, the area of highest light on the scheme (50 lux area),

Woods Mill, Henfield, West Sussex, BN5 9SD  
01273 492 630 | [enquiries@sussexwt.org.uk](mailto:enquiries@sussexwt.org.uk) | [sussexwildlifetrust.org.uk](http://sussexwildlifetrust.org.uk)

Chairman: Carole Nicholson Chief Executive: Dr. Tony Whitbread

Sussex Wildlife Trust is a company limited by guarantee under the Companies Act. Registered in England, Company No. 698851.  
Registered Charity No. 207005. VAT Registration No. 191 305969. Registered Office: Woods Mill, Henfield, West Sussex, BN5 9SD

is in the only part of the site where bat activity has been recorded i.e. the location of the emergence survey. The Sussex Wildlife Trust is also concerned that the lighting scheme parameters recommended in ES section 12.7.17 are caveated with the wording 'where possible' as follows:

*'An ecologically sensitive artificial lighting scheme has been designed for the site during its operational phase to minimise impacts on retained ecological features (including the adjacent railway corridor). Artificial light spill onto retained features and new grassland has been kept (**where possible**) to a maximum of 1 lux.*

*Appropriate use of lighting technologies, such as direction lighting, would assist this. **Where possible**, the use of white LED lamps with a 'cool' colour temperature would be selected as this has lower attractiveness to insects and would be less likely to attract bats away from darker areas where they will more routinely forage (Fure, 2012).'*

We are concerned that this proviso may mean that these lux levels may not be met during operation and seek clarity on the reasons why this may be the case. We ask West Sussex County Council (WSCC) to ensure that the lighting scheme is in line with the Bat Conservation Trust Guidelines on lighting<sup>1</sup>.

We also remind WSCC of paragraph 99 of the ODPM CIRCULAR 05/06 Biodiversity and Geological conservation – Statutory obligations and their impact within the planning system:

*'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted.'*

The Sussex Wildlife Trust is also concerned about the impacts this proposal may have in combination with the North of Horsham development which has been granted outline planning permission (DC/16/1677). We notice that cumulative effects have been considered for each of the ES chapters, however this seems to be in relation to the development principle as a whole, rather than the specifics of the outline permission. For example, the outline permission includes an area of allotments within 500 meters of the proposed development site which does not seem to have been specifically considered in the ES.

We remind the council of their duties to biodiversity under section 40 of the Natural Environment and Rural Communities Act 2006. Before this application is determined we ask WSCC to:

- Assess whether that allocation development principles are being delivered given the limited nature of the protected species surveys.
- Ensure that the lighting scheme is compliant with the Bat Conservation Trust Guidelines<sup>1</sup>
- Ensure that there is adequate information to assess the cumulative impacts this development and developments nearby have on protected species and ecological connectivity.

Yours sincerely

Jess Price  
Conservation Officer

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<sup>1</sup> Stone, E.L. (2013) Bats and lighting: Overview of current evidence and mitigation  
[www.bats.org.uk/pages/bats\\_and\\_lighting.html](http://www.bats.org.uk/pages/bats_and_lighting.html)



**From:** [Steve & Rach](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#)  
**Subject:** OBJECTION Reference WSCC/015/18/NH BrittanicaCrest Warnham Brickworks Incinerator  
**Date:** 25 April 2018 16:39:01

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Please register my OBJECTION to this application

## **General principles**

-

Britaniacrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to 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 taxpayers money.

The site is too small and unsuitable. Due to lack of land Britaniacrest propose to build double height with an extremely tall chimney that is far higher than the existing brickworks chimney itself a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

## **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 5 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 overcapacity 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. It seeks waste from outside the local area and thus 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 be lit like a Christmas tree producing 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 3-5nm 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 acknowledged 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 for 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.

[REDACTED]

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**From:** Jackie [REDACTED]  
**Sent:** 25 April 2018 17:45  
**To:** PL Planning Applications  
**Subject:** Planning Ref WSCC/015/18/NH

Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in Tuggles Plat, Warnham and am writing to object to the  
above planning application.

The proposals for an incinerator does not meet WSCC waste plan for the  
following reasons:

Strategic Objective 5: to make provision for a new transfer, recycling and  
treatment facilities as close as possible to where waste arises. The scale and  
throughput of the proposed plant is incompatible with the disposal of local  
waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle  
close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of Warnham and  
Horsham and so we believe it does not meet the criteria.

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.  
This incinerator clearly does not meet this requirement.

Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

#### Noise Pollution

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

#### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

#### Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely  
Jackie Jaffe

2, Tuggles Plat, Warnham,  
Horsham RH12 3RA  


Ref: WSCC/015/18/NH

Dear Sir,

I strongly object to the proposed Britaniacrest planning application for an incinerator at the site in Langhurstwood Road , Horsham, West Sussex for the following reasons:

**1. Non-compliance with West Sussex County Council's Waste Local Plan.**

I recall that some years ago West Sussex County Council and Biffa, were putting forward an incinerator in Langhurstwood Road Horsham as part of the waste plan for West Sussex. There was significant objection to this option from the residents of Horsham and incineration was abandoned for very good reasons. Alternatives solutions were implemented and incorporated within the Waste Plan.

Even if the council was to consider this application, it would need to overcome the following major points.

**2. The size of the plot being considered in the application.**

Despite the applicant revised layout, it would still have a major impact on Horsham and its surrounding villages.

**3. Health Impact.**

Since the council rejected Incineration as an option some years ago, There is still an uncertainty regarding the health impact.

**4. Proximity of the proposed Incinerator to potential significant Housing Development.**

Horsham District Council has included a major development as part of its Local Framework Plan. The proposed plan includes some 2,500 homes, schools and offices which would be affected by this application.

**5. The application would rely on waste from outside the West Sussex boundary.**

This goes totally against the current Waste Plan and if approved would generate even more HGVs coming from significant distances. Indeed there is evidence of over capacity of incinerators in the UK as a result of increase in recycling.

**6. Conclusions.**

West Sussex has no requirement for such a plant to meet its waste plan and it should be rejected.

Kind regards

Joseph Lamberty  
Home Farm,  
Langhurstwood Road, Horsham, West Sussex

20 Bell Rd  
Warnham,  
Horsham,  
W. Sussex

RH12 8QL

Dear Sirs

Ref. WSCC/015/18/NH

I am writing to object to the  
Proposed Horsham Incinerator at  
Warnham.

Surely the BIFFA Mechanical Biological  
Treatment facility that we have now  
is enough?

My main objection is to health.  
Surely the emissions are harmful.

Secondly this is a site with  
country lanes around it, peaceful  
blackberry-picking and dog-walking  
are until recently when the number  
of huge lorries is spoiling it.



There is a persistent smell in the current buildings, this is not our local rubbish but will come from far afield, the proposed Tower is a nightmare, the north Horsham proposed new housing site is too close, and possibly anyhow it will be redundant quite soon.

I feel sure that the disadvantages outweigh the advantages and that ecologically it is a bad idea.

Please do not let this project go ahead.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.A short horizontal black line used to redact a line of text, likely a name or address.

**From:** [Sheila White](#)  
**To:** [PL Planning Applications](#)  
**Subject:** FW: Planning Application WSCC/015/18/NH - Objection  
**Date:** 27 April 2018 14:21:47

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I am resending the following e-mail because my objection to this application does not appear on the portal, although it was sent on 21<sup>st</sup> April. My husband (William Harwood White) sent in his own objection at about the same time and I can see it has been recorded. Somehow my objection seems to have been missed. I would like it to be recorded as per the following e-mail. Thank you.

Sheila White

Sent from [Mail](#) for Windows 10

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**From:** [Sheila White](#)  
**Sent:** 21 April 2018 13:14  
**To:** [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)  
**Subject:** Planning Application WSCC/015/18/NH

I strongly object to this application for the following reasons:

Although West Sussex County Council's Waste Local Plan 2014 identifies a need for further transfer, recycling and treatment facilities for waste in the county, this application is not compliant with HM Government's National Planning Policy Framework 2012, nor the Horsham District Planning Framework 2015. Indeed it also contravenes WSCC's own Waste Local Plan 2014 in several particulars:

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

Obviously, this objective would not be met, because the applicant seeks to import mostly commercial and industrial (but some domestic waste too) – not just from West Sussex, but from other counties as well. They will need to import waste from further afield for financial reasons and just to keep the monster fed.

-

Strategic Objective 7: *"To maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste". (cf. also Policy W18)*

Clearly this objective would not be met because the applicant's plan for bringing in the waste relies on the use of lorries on local roads. Their submission clearly indicates only two HGV routes to the site. One would be along the A264 from the direction of Crawley and the M23 and, crucially, the other would use the A24 from the direction of

Dorking and the London area. Although the A24 is a primary route between the South Coast and Central London, the section between Great Daux roundabout (close to the proposal site) up to Capel in Surrey is a notoriously hazardous, narrow, single carriageway with many dangerous bends. WSCC Highways Authority has been obliged to reduce the speed limit and erect warning signs along this stretch of road. It is totally unsuitable for use as one of only two routes to the site. Even the Government Planning Inspector drew attention to this problem stretch of road when conducting his enquiries about the "North of Horsham" major housing development that is due to be built next to this application's site.

Strategic Objective 8: *"To protect and, where possible, enhance the special landscape and townscape character of West Sussex". (cf. also Policy W11)*

Since withdrawing their previous application for this site (due to the overwhelming opposition to their original plan) the applicants have tried to reduce the impact of their planned facility by reducing the size of the building to house the incinerator. However, the bulk of this enormous building (approximately 12 storeys high and approximately 140m long) would still be 1.36 times taller than the existing brickworks chimney stack. Even at this reduced size, the main building, together with the 96m high flue stack to cope with its emissions, would overpower the local landscape and thus contravene this objective.

Strategic Objective 10: *"To protect and, where possible, enhance the natural and historic environment and resources of the County". (cf. also Policies W11, W12, W14 and W15)*

Clearly this application contravenes this strategic objective and the policies stemming from it. This enormous, ugly incinerator with its accompanying stack, visible for 15km - and more when emission plumes are visible - would blight the immediate and surrounding areas, including the nearby Areas of Outstanding Natural Beauty and designated parks and gardens. Much closer to the proposal site (within 1.5km) are the Warnham Conservation Area and several national heritage assets (including scheduled monuments and 36 listed buildings). A near neighbour of the site is the Warnham Nature Reserve. The inevitable 24/7 noise and night-time light pollution would certainly disturb the wildlife on the nature reserve in contravention of Policy W14..

Strategic Objective 13: *"To protect and, where possible, enhance the health and amenity of residents, businesses, and visitors". (cf. also Policy W19)*

Again, this application is non-compliant. The results of Public Health England's study into the possible harmful effects of emissions from incinerators are still not available. Indeed, informed opinion is moving towards the idea that there are already too many mass-burn incinerators in the country and moves are afoot to bring in a moratorium on building new ones. We do not yet know what harmful effects complex chemical combinations can have on people's health. The site's proximity to Gatwick and the

hazards of a mix of aviation fumes and pollutants and particulates from the incinerator's flue are unknown.

Horsham District Council has granted planning permission for 2,750 new homes, a secondary school, primary school, early years school, a special educational needs school, a business centre, a sports hub and sports pitches, various recreation areas and allotments to be built on the "North of Horsham" development site which lies adjacent this application site. It is incumbent on West Sussex County Council, which has a duty of care, to safeguard the health and amenity of these new residents, as well as those already living in the area. The prevailing airflow from the proposal site will mean any harmful emissions from the stack would drift over this neighbouring development.

In addition there will certainly be added pollution from HGVs (up to 284 two-way movements **per day**) travelling to and from the site, which must be taken into consideration. This would apply, not only to the local area, but further afield as lorries will be bringing waste from other counties. Toxic and hazardous residues would then have to be trucked away from the site to where they could be treated appropriately.

Aviation lighting will be necessary on this massive structure and stack, so there will also be an adverse effect on the local area from light pollution at night.

In addition, there is the matter of noise which, it is understood, can have a harmful effect on people, particularly if it affects their sleeping pattern. It is acknowledged that an increase of anything over 5dB indicates an adverse impact on people. The applicant acknowledges that at night, in the operational stage, there would be an increase in background noise levels for local residents of 6dB. This is unacceptable.

Policy W21: "**Cumulative Impact**. Proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result...."

Clearly the application does not comply with this policy. Scrolling through the documents accompanying this application I was struck by how many times the phrase "Minor adverse effect" (as well as "Moderate adverse effect") was used in the applicant's analyses of outcomes. In my view, the cumulative impact of all these "adverse effects" leads to a **major adverse impact** on the local community and environment.

For all the above reasons and because the scale of the development is out of all proportion to its location and rural environment, I urge West Sussex County Council to refuse this application in its entirety.

Name: Sheila White

Address: 1 Great Daux Cottages, Dorking Road, Warnham, RH12 3QQ

Contact Tel: [REDACTED]

Sent from [Mail](#) for Windows 10

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**From:** Simon McShane  
**Sent:** 29 April 2018 13:04  
**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 a 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 to 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 earmarked 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.

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**From:** Gray and Claire  
**Sent:** 28 April 2018 22:10  
**To:** PL Planning Applications  
**Cc:** david.sheldon@westsussex.gov.uk; Nigel Dennis; Morwen Millson;  
elizabeth.kitchen@westsussex.gov.uk; Louise Goldsmith  
**Subject:** WSCC/015/18/NH - Objection

Objection re. WSCC/015/18/NH

I **strongly** object to the proposed Britaniacrest incinerator being built, for the following reasons:

1. The size of the construction is excessively large and high and will have a major negative impact on Horsham and surrounding villages.
2. West Sussex and the country on the whole, should be making provision for a new transfer, recycling and treatment facilities *as close as possible* to where waste arises. The scale of this plant seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator. This is incredibly un-environmentally friendly.
3. There is nothing to suggest that the proposed incinerator will enhance the local area. In fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty.
4. We live in North Horsham and have young children, who walk, cycle and play outside as much as possible ... the pollution from the emissions including lead, mercury and dioxins is of **huge** concern. There are of course also the concerns about dust, light pollution and noise.
5. There are already long queues in and around the outskirts of Horsham at busy time, which is only getting worse by the number of new houses that have been and are being built. The increase in road traffic (to the proposed incinerator) and the impact it will have on business travel in delays, will have a detrimental impact on Horsham as a whole.
6. WSCC have shown 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. The government is already beginning to consider compelling evidence that there is overcapacity 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. Not only that, but this would lead to much more traffic and the environmental damage that would cause.
7. Following on from the point above, research increasingly indicates that incineration reduces recycling. 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, which is absolutely ridiculous.
8. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of tax-payers money.
9. Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.
10. 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. This won't be welcome during the day, but even less welcome on hot, summer nights when you tend to sleep with the windows open.

11. Visual Impact of the development: The proposal does nothing to hide the impact it will have on the beautiful rural countryside we have north of Horsham, and will be totally overpowering and intrusive day and night as it sits above the natural tree height canopy.
12. 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.
13. With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging. Surely investing time in a sustainable future ... using less, wasting less, and recycling more is the right solution.

Thank you for your time, and I do hope the proposed incinerator is rejected again, for the health and sustainability of the Horsham area and its residents.

Yours sincerely,

Claire Saich

4 Roffeyhurst  
Forest Road  
Horsham  
West Sussex  
RH12 4HL

27<sup>th</sup> April 2018

**RE:Planning Ref:WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road,  
Horsham, West Sussex RH12 4QD**

Dear Sirs

As residents of Horsham we would like to strongly object to the proposed incinerator that is to be built at the above address.

The proposals for an incinerator do not meet WSCC waste plan:

**Strategic Objective 5:** to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. **The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside the county.**

**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 enhance the natural environment.**

**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. **The proposals will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.**

**Policy W12: High Quality Developments:** Proposals for waste development will be permitted providing 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. **This incinerator clearly does not meet this requirement.**

**Visual Impact:** The proposed chimney for the incinerator is 35.92 metres high significantly taller than the existing chimney at the brickworks 26.5.

The building will be a huge carbuncle on the landscape, larger than Horsham's shopping centre, the chimney will be seen from Leith Hill in the North and the South Downs in the south and will stick out like a sore thumb.

**Lighting Pollution:** For the CAA to demand middle and top of the stack lighting at night due to its closeness to flight paths is a concern as well as a hazard. The chimney will be lit up like a Christmas tree producing significant increase to the light pollution around the area.

**Recycling:** The BIFFA bio-mechanical digester taxpayers paid for to deal with household waste will become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial waste. **Burning waste is short sighted and damaging to the planet. Where is all this waste coming from to warrant an incinerator of this size. This information does not appear to be forthcoming.**

**Air Quality:** The air quality around Horsham is declining due to air pollution from Gatwick, congested roads causing car pollution and now pollution from an over-sized plant for the waste. **This will also be compounded by a significant increase in HGV lorries servicing the site.**

**Operations:** Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on-going operation of the incinerator.

In addition it would appear that there are no plans for the incinerator to be linked to the National Grid within this proposal, very short sighted.

Horsham residents already suffer enough with noise and pollution from Gatwick Airport. Why should we suffer the toxic fumes from incinerator burning commercial and industrial waste for a significant area of the south of England.

We also feel that WSCC should have a full council meeting to discuss the planning application.

Vera and Martin Abbott

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**From:** Rachel Ford  
**Sent:** 27 April 2018 22:11  
**To:** PL Planning Applications  
**Subject:** Proposed Horsham Incinerator, Application Number: WSCC/015/18/NH

RE: Proposed Horsham Incinerator, Application Number: WSCC/015/18/NH

I am writing to express my concerns regarding the application to build a new waste incineration plant in North Horsham. For the following reasons I would like to submit my objections to the application.

The proposed application does not comply with West Sussex County Council's Waste Local Plan. The size of the construction is excessively large, and the height of the chimney stack will have a major negative impact on the surrounding villages, countryside and areas of outstanding natural beauty.

Commercial waste from businesses across the south east region will be transported to the site to be dealt with, which is not in accordance with strategic objective 5, to make provision for waste to be recycled as close to its source as possible.

Contrary to Strategic Objective 11, protect and where possible enhance the natural and historic environment, the proposed plant will be visible from as far as 15km away causing a blight on the countryside and doing the opposite of enhancing the natural environment.

Policy 26 of the Horsham District planning framework states that any proposal must be of a scale appropriate to it countryside character and location. I believe the proposed incineration plant is not of an appropriate scale and it does not enhance, conserve or protect any key features of its surrounding area, in direct contravention of policy 26. Furthermore, the policy states any proposed development should not increase the overall level of activity in the countryside, which would be the case with waste from across the south east being transported to the site.

**INCINERATION DOES NOT REMOVE WASTE**, it simply converts it into another form (gas, particulates, ash) and these new forms are typically more hazardous, though less visible, than the original form. Research indicates that there are no safe levels for fine particulates and many large studies have been conducted which have shown significant increases in cancers, heart disease and birth defects around incinerators, with a real possibility that genetic changes will occur and be passed on to succeeding generations. As a resident living less than a mile from the proposed site, this is undoubtedly my major concern. I seriously doubt that any of the people behind this proposal would actually want to live, with their families, less than a mile from such a site!

There has been insufficient analysis of the effects of incineration specifically relating to the North Horsham area, rather just a general argument for incineration versus landfill. For a fair assessment to be carried out the local area needs to be taken into account, the fact that there are plans to build 3 schools directly adjacent to the site, with 2 existing schools less than 2 miles away, demonstrates the need for a detailed environmental and health study on the impact of the incinerator specifically within the area of construction. Any such development should not be seriously considered without full consideration of the potential health impact to local residents.

Beyond everything else, I am struggling to understand why an outdated method like incineration is actually being proposed. Far safer alternative methods are now available including recycling, mechanical biological treatment, aerobic digestion and plasma gasification: a combination of these would be safer, would produce more energy, would be cheaper than incineration in the long run and would be much cheaper especially when health costs are taken into account. Also, as recycling is increasing at such a rate, an incineration plant will be practically redundant within a few years, so in order to reclaim their investment they will have to actively discourage businesses from recycling, in order that they still have enough to burn!

On a personal note, I have been looking to self-build for several years now in the Horsham area and would find it a travesty if this proposal went ahead given its severely negative impact on the countryside, when I have been told that it's not possible to self-build a small family dwelling outside the town boundary due to the planning office claiming it would not positively enhance the countryside or its surroundings, yet it would have far less impact than a giant chimney stack emitting dangerous chemicals.

The proposed incinerator contravenes the United Nations Commission on Human Rights, the European Human Rights Convention (the Right to Life), and the Stockholm Convention, and violates the Environmental Protection Act of 1990 which states that the UK must prevent emissions from harming human health.

Yours sincerely,

Rachel Ford

(North Horsham Resident)

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**From:** Colin & Denise  
**Sent:** 27 April 2018 17:37  
**To:** PL Planning Applications  
**Subject:** Planning Application Number: WSCC/015/18/NH - Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD

Dear Mr Dumbrell,

I am corresponding to register my objection to the proposed incinerator, to which your reference above relates, as amongst other issues I do not believe this application meet the WSCC waste plan, and I refer to the following in this regard:

Strategic Objective 5: "To make provision for a new transfer, recycling and treatment facility as close as possible to where waste arises". The size, scale and throughput of the proposed development does not appear to satisfy this objective, as it is likely to have to attract waste from outside of the WSCC boundary, to keep it operating around the clock, and cannot therefore be defined as being placed close to where the waste it will consume will be produced.

Strategic Objective 10: "To protect and where possible, enhance the natural and historic environment and resources of the County". There appears to be no element of this proposal that will enhance the environment.

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 ....". Given the size and scale of the proposed development, it will inevitably have a considerable impact on the character of the area around it, and I would suggest on the town of Horsham itself.

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 etc. (b) have regard to the local context including: (iii) the topography, landscape and skyline of the surrounding area; (iv) views into and out of the site. I would suggest that the proposed incinerator and associated stack do not meet these requirements.

I now refer to other aspects of the proposal:

Noise Pollution – It is proposed that this site will be in operation 24 hours a day, 7 days a week. As such it is likely to create noise levels in excess of the ambient noise levels for rural areas. As the ambient levels decrease at night, any noise pollution will be even more noticeable at these times, and I note that there appear to be issues with this at the existing site, which does not bode well for the scale of development proposed.

Air Quality – Coupled with the proximity to Gatwick Airport, and road infrastructure in this area, which no doubt already have an effect on air quality, there is likely to be a further deterioration due to the emissions produced from this proposed development.

Flue Stack – The height of the proposed stack is I understand 95 metres, which will dwarf buildings/landscape in the area, and for a considerable distance beyond. The plume from this stack is also likely to be visible for a considerable distance further.

Light Pollution – As it is a CAA requirement that warning lights are placed on the stack, this is likely to significantly increase the light pollution in the area.

Visual Impact – Given the proposed incinerator building will be around 36 metres tall, it will be some 10 metres taller than the existing brickworks chimney, which is itself already visible from some distance away.

Vehicular Movements – I would suggest that there would be a need for more lorry movements, to and from this site than there are at present due to the fact that this would be a 24 hour operation, and it is likely that a number of these would be from outside of the West Sussex area, due to the need to feed this plant, and remove ash waste. This in itself is likely to increase road congestion and pollution in the surrounding areas.

In closing I was also amazed to learn that this proposed incinerator will replace the existing bio – mechanical plant which will then be shut down. I was under the impression that the bio-mechanical installation would be able to deal with the waste produced in the County for years to come. There is a considerable difference in the scale and operation of the bio-mechanical site and a proposed incinerator, and just because one type is already in operation on a site doesn't make that site suitable for every other type of waste disposal methodology.

Yours Sincerely,

Mr C. Panton

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**From:** Naden AMMIGAN  
**Sent:** 27 April 2018 16:54  
**To:** PL Planning Applications  
**Subject:** Attention: Planning - WSCC/015/18/NH

As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

### **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.



Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSCC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

THANK YOU

Naden Ammigan

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**From:** elliot baker  
**Sent:** 30 April 2018 14:08  
**To:** PL Planning Applications  
**Subject:** Re: Objection to WSCC/006/18/NH

Yes you are correct, apologies

Elliot

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**From:** Jane Moseley <[jane.moseley@westsussex.gov.uk](mailto:jane.moseley@westsussex.gov.uk)> on behalf of PL Planning Applications  
<[planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)>  
**Sent:** Monday, April 30, 2018 2:06:46 PM  
**To:** elliot baker  
**Subject:** RE: Objection to WSCC/006/18/NH

Mr Baker

From what you have said below I assume you intended to object to the proposed energy-from-waste facility which is application ref. WSCC/015/18/NH rather than the above reference number which relates to the amendment the existing site layout.

Could you please confirm whether this is the case.

Thanks  
Jane.

**Jane Moseley**  
County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate  
West Sussex County Council, Ground Floor, Northleigh, County Hall, Chichester PO19 1RH  
Phone: 0330 22 26948  
Email: [jane.moseley@westsussex.gov.uk](mailto:jane.moseley@westsussex.gov.uk) | Web: [www.westsussex.gov.uk](http://www.westsussex.gov.uk)

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**From:** elliot baker [<mailto:elliotsb@hotmail.co.uk>]  
**Sent:** 30 April 2018 13:51  
**To:** PL Planning Applications  
**Subject:** Objection to WSCC/006/18/NH

Dear West Sussex County Council,

I would like to formally object to the above application, as a resident of Horsham I find this to be an extremely damaging proposition, with the whole image, reputation and attractiveness of Horsham put at risk for someone else's profit. This service could easily be provided out of sight of the major access routes to Horsham, otherwise we will be recognised as "the place with the big incinerator", and not a historical market town with lots to offer.

Please consider this a written and formal objection,

Many thanks,

Elliot Baker

ANNE HARKNESS-LAMBERT

4, DELIUS GARDENS,

HORSHAM,

WEST SUSSEX.

RH.13 6 RY.

27th. April, 2018

To. Whom It May Concern -

re. BRITAINIA CREST INCINERATOR

I wish to strongly object to  
the above proposed plans.

It would be a complete  
eyesore. Also pollution of area  
+ increasing road congestion etc.  
etc. noise, I can find not one  
single thing in its favour.

Think again please!

Yours sincerely

[Redacted Signature]

Hill Barn Cottage,  
School Road,  
Wisborough Green.  
West Sussex RH14 0DU

27<sup>th</sup> April 2018

County Planning  
West Sussex County Council  
County Hall,  
Chichester. W. Sussex.

Attention - Planning  
Ref. WSCC/015/18 NH.

Recycling, Recovery and Renewable  
Energy Facility

Dear Sirs,

I write to object to the above proposal  
to establish an Incinerator at Wealden Brickworks,  
Langhurstwood Road, Horsham W. Sussex.

My principal objections are - the proposed size of  
this industrial plant, the fact that as the  
proposed scale materials for disposal/recycling  
will be imported to a district already providing  
service for the locally produced waste, thus adding  
an unnecessary heavy goods traffic to roads  
already bearing an out of area traffic load for  
industry, construction and Gatwick Airport, and  
light pollution from safety illumination (air traffic)  
a building taller than the brickworks on site.

This proposal works against the interests  
of Horsham residents, and the wider West Sussex

population already seeing major additions in construction and domestic building over an area formerly attractive countryside, a constant increase in traffic in roads never designed for modern vehicles in country areas adjacent to the main A24 / A29 / A281 / A264 network.

Converting North Horsham into a densely industrialised and residential area with yet more pressure of infrastructure build-up is a much mistaken policy.

Importing waste into the area only serves to add to the problems already caused by developments on greenfield sites attracting an undesirable increase in population

Yours faithfully,



MRS. [REDACTED]

5 Foxfield Cottages  
Southwater.

I do very strongly object. I am old and still expect good clean air. Think of the children in that area, they need clean air for their future and us oldies also need clean air.

The one at Newhaven is dreadful. pumps out foul smoke 24/7, my close relatives live at Peacehaven and it does effect them badly. and a dreadful blot on the countryside.

NO, NO, NO.

**Don't leave it to others to object** - say no to building an industrial incinerator on your doorstep  
– Visual impact from a huge industrial building and chimney stack on rural areas and areas of outstanding natural beauty; pollution from the stack and road; increased road congestion as waste is shipped in from far and wide to Horsham via our roads; noise – operations will be 24/7; light pollution as it will be light up at night due to Gatwick; burning of waste is short sighted and reduces recycling.

**Object today and keep Horsham an attractive and healthy place to live and work.**



<http://www.ni4h.org>  
Noincinerator4horsham

# Objection to Planning Application

## WSCC/015/18/NH –Britaniacrest Recycling Ltd

### from Ni4H (No incinerator 4 Horsham) XX April 2018

#### Introduction

No incinerator for Horsham (Ni4H) is a voluntary group formed by local residents to raise awareness and campaign against the proposal for a large-scale incinerator in Horsham District.

Ni4H takes over from a previous campaign group called HALT in Horsham which successfully fought a proposal for an incinerator in the early 2000s. As a result, West Sussex County Council (WSCC), and the taxpayers of West Sussex, made a significant investment in a Mechanical & Biological Treatment facility (MBT) at the Brookhurst Wood site, next to the existing landfill which was due to close. The new facility provided West Sussex with an additional waste processing capacity of 310,000 tonnes per annum.

Ni4H appreciates there is a pressing need to manage waste. Members of the group have spent many hours reviewing evidence in the public domain to try to understand waste management needs, technologies and possible solutions. They have also examined the West Sussex Waste plan and Britaniacrest's supporting documents, attended public meetings, and provided representatives to the Residents Liaison Group (RLG) for Britaniacrest since 2015.

Responses to the proposal represent our understanding of the relevant policies, guidance, and planning information. We would like to highlight that lack of information pre-planning and the continued poor engagement across Horsham District to those individuals who will become most impacted by such a significant development which will alter the face of the town and surrounding areas for generations to come.

Ni4H's objection is in two parts with an accompanying Executive Summary:

- 1) The extent to which the development meets the planning policies of the West Sussex Local Plan, Horsham District Planning Framework, National Planning Policy Frameworks and National Planning Policy for Waste and the strategic objectives/policies within.
- 2) Other issues of application
- 3) A summary of the members overarching objections

Ni4H objected to the previous application made under WSCC/062/16/NH. Although the applicant has made some small changes to the design of the building and added more information it still remains of the view that nothing material has changed in respect of the reasons to which it objected initially. The WSCC planners note dated 18 July 2017 to the Planning Committee recommended that the application is refused on the grounds of:

- Poor quality design and the scale, mass and height of the proposed facility including the height of the stack



- Unacceptable and significant adverse impacts on the wider landscape including the AONBs, character of area, heritage assets and visual amenity of residents (current and future)
- Contrary to Policies W11, W12, W13 and W15 of West Sussex Waste Local Plan (2014), Policies SD 7, 25, 26, 30, 32, 33 and 34 of Horsham District Planning Framework (2015); and paras 17, 56, 57, 60-67, 115, 129, 134 and 135 of the National Planning Policy Framework (2012)
- Failure to demonstrate that the noise would not have a significant adverse impact on residents and therefore contrary to Policies W10 and W19 of the West Sussex Waste Local Plan; policy 24 of the Horsham District Planning Framework (2015) and paragraph 123 of the National Planning Framework (2012)

We believe the applicant has not overcome the above; with the latter being unclear as to how they may have addressed a doubling of the background noise noted in the first application to a small increase in noise mainly at Station Road. We remain of the view that the same recommendation is made and request our following views are put forward to the planning committee in due course.

# Executive Summary

Ni4H argues that this development continues to not meet the following objectives, policy, and guidance:

West Sussex Waste Local Plan (2014)	<ul style="list-style-type: none"> <li>• Strategic Objectives 5,7, 8,9,10,13 and 14.</li> <li>• Policy W11 Character</li> <li>• Policy W12 High Quality Developments</li> <li>• Policy W13 Protected Landscapes</li> </ul>	<ul style="list-style-type: none"> <li>• Policy W15 Historic Environment</li> <li>• Policy W19 Public Health and Amenity and</li> <li>• Policy W21 Cumulative Impact</li> </ul>
Horsham District Planning Framework (2015)	<ul style="list-style-type: none"> <li>• Strategic Policy 1 &amp;2</li> <li>• Policy 24 (Environmental Protection)</li> <li>• Policy 25 (Natural Environment and landscape character)</li> <li>• Policy 26 (Countryside protection)</li> <li>• Policy 30 (Protected landscapes)</li> </ul>	<ul style="list-style-type: none"> <li>• Policy 32 (Quality of New Development)</li> <li>• Policy 33 (Development Principles)</li> <li>• Policy 34 (Cultural and Heritage Assets)</li> <li>• Policy 40 (Sustainable Transport)</li> <li>• Policy 41 (Parking)</li> </ul>
National Planning Policy Framework (2012)	Paras. 17, 56, 57 66-67, 115, 125, 129 134 and 135	
National Planning Policy for Waste (2014)	Paragraph 7	
Planning Practice Guidance	Paragraph 47	

See [Section 1](#) for details.

Ni4H's objects to the development on the following grounds:

- The applicant has failed to evidence it can meet the EU Directive definition of a 3Rs development; Ni4H consider this to be a disposal rather than recovery plant and therefore the proximity principle needs to be applied.
- The site is too small for the development proposed. The proposed buildings are significantly sized in terms of height and bulk making them not only visible from outside the site itself but also a considerable distance away.
- The building design, size and location will create a view of intense industrialisation overshadowing and causing long-term damage to the character of Horsham and Warnham and the local environment. Harmonisation has not been achieved within the area.
- The visual impact is understated by the applicant's papers. It is not a high-quality development and will not protect or enhance the landscape and townscape character of West Sussex.
- The waste source extends significantly beyond West Sussex's waste needs and so is contrary to the West Sussex Waste plan. (Also relevant for point 1 above)
- West Sussex's Waste plan aims to protect, and where possible, enhance the health and amenity of residents, businesses and visitors. This cannot be guaranteed if the proposal goes ahead with resultant and cumulative pollution, land contamination, and reduction of air quality. The applicant has not provided adequate evidence to support no impact to human health. We are also of a view that the Carbon Assessment is flawed.
- Potential impacts of incinerator traffic, sought in advance under planning applications WSCC/018/14/NH and WSCC/021/15/NH- this level of traffic has not yet been achieved so any data used in the application is not accurate. The changes now approved as part of North

Horsham has not been taken into account- of most note the changes to access to Langhurst Wood Road. Sustainable methods of transport are not being used. Waste will be travelling greater distances and therefore not sustainable over the 25-30-year period.

- Cumulative effects of waste processing have not been assessed on the local area and how this is at odds with the need to expand the residential footprint in very close proximity.
- Loss of amenity for residents, including: noise, odour, traffic, light pollution.
- Inadequate public consultation of Horsham District residents, including input into the design and sharing of the Environmental Statement. For such a large impactful development such as this, greater promotion/ exhibition space and timing of such should have been reflective of the population affected. The 2 exhibitions were poorly promoted with insufficient notice and only commensurate to a very small localised area affected.
- Limited benefit of the energy (heat and electricity) developed as a by-product of the incineration process.
- Increased risk of fire and resultant health risks

See [Section 3](#) for details.

## Section 1: West Sussex Waste Local Plan 2014 - its strategic objectives and other planning considerations

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

- 1.1.1 Although the site meets the objective to develop new facilities, alternative sites meet a large proportion of the waste provision needed for C&I in West Sussex.

**If planning for this facility is granted, the source of waste would not be predominantly locally nor county sourced in its totality. This is not sustainable as it poses environmental concerns in relation to HGV journeys needed to “feed” the incinerator over a 25-year period (or longer).**

- 1.1.2 Permitting privately-owned waste recovery plants does not mean that West Sussex will be able to secure the capacity for West Sussex waste streams.

The operating model described by Britaniacrest will make use of its existing customer base and other transfer businesses to feed the incinerator. The incinerator will be built and operated by another company. We do not know if this arrangement will allow other waste suppliers to enter into commercial arrangements with the incinerator operator.

**If we assume Britaniacrest is the sole supplier, it will be difficult for WSCC to constrain the development to only process waste derived from West Sussex. Many transfer stations could receive waste from different sources. If they then transport waste on to this site, the waste could be travelling significant distances and as a result make very little impact on West Sussex’s strategy to be net self-sufficient.**

Any constraint on the movement of waste, if applied, would be difficult to enforce and monitor with existing resources at WSCC. We are also led to believe a recent court case allows commercial waste companies to define their own business operations unconstrained by county boundaries.

- 1.1.3 Paragraph 2.11.3 of the Waste Plan notes that waste management should be “in keeping with the principle of net self-sufficiency, no provision is made to meet the needs of adjoining authorities elsewhere in the region or the UK”.

Paragraph 6.2.7 states “...it is not considered appropriate to make the provision for the continued disposal of waste from outside West Sussex”.

**It should therefore by extension be assumed that waste processing from imported sources should not be continued unless it makes sense to do so. Although West Sussex has previously, and continues to import waste, the Waste Plan notes this is unsustainable if it is to meet the zero to landfill objective. Other authorities should be working to meet that goal within their own boundaries**

- 1.1.4 Paragraph 6.2.4 of the Waste Plan notes that “limited cross border waste movements would need to be justified on their merits”.

For this development, the 230,000 tonnes of incoming waste will be sourced from the Southern Counties, including Hampshire, Kent, Surrey, East Sussex and London, through Britaniacrest's existing operation. Waste could be sourced from up to a 40-mile radius of the site. On their [website](#)<sup>i</sup>, Britaniacrest state that their customer base could be as far as 100 miles away.

**If the permission is granted, then cross-border waste movements will almost definitely occur. It is not clear what the case for these cross-border movements are, and how far this development will help West Sussex meet its net self-sufficiency requirement. The justification for doing so has not been adequately made in line with the requirement set out in the Waste Plan.**

- 1.1.5 In a 2013 planning application for the Britaniacrest's main site in Horley, they note their customer base is predominantly South London, with waste also coming in from Surrey, West Sussex (Crawley and South Coast), East Sussex, Kent and Hampshire. However, many of these counties have permitted their own incinerators, and other waste processing plants. This casts doubt on the long-term future of these sources of the waste.

If these counties find their own waste solutions, in the same way as West Sussex is, then it is wholly possible waste will be sourced from a much greater distance or worse still, take waste streams which could be met through greener approaches in the waste hierarchy, such as recycling, composting etc. It is also noted this application now includes household waste streams; the concern is this could undermine the MBT already funded by taxpayers and undermine the high level of recycling achieved in the county.

**This operation is a 25/30-year commitment to find 180,000 tonnes of waste to burn and up to 50,000tpa to recycle. WSCC should consider this point carefully. WSCC have invested heavily in the MBT and recycling initiatives to reach a high level. The applicant's private business should not be allowed to put that at risk by developing a capacity which is inappropriate for the location.**

- 1.1.6 It is also noted that for application WSCC/062/16/NH, Surrey County Council responded that it does not have sufficient waste management facilities and so it is reliant on making use of neighbouring facilities. It stated: -

*"... In view of the proximity of the application site to the county boundary with Surrey, the catchment area for the proposed development will include a significant area of Surrey".*

This reinforces the likelihood of cross-boundary waste transfer but also of the distance waste will likely travel to be burnt posing an increased pressure on the local road network on roads such as the A24, but also reducing the level of sustainability/carbon assessment benefits as a result of HGV diesel engine journeys being made.

## 1.2 Strategic objective 7: to maximise the use of rail and water transport for the movement of waste to minimise lorry movements and the use of local roads for the movement of waste.

1.2.1 Policy W18 from the Waste Plan states “Proposals for waste development will be permitted provided that:

1.2.1.1 (a) where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site;

1.2.1.2 **The applicant is not making use of rail as a more sustainable transport method for the waste. This is despite the site being located adjacent to the rail line at Warnham, which connects into the main Horsham line servicing much of West Sussex.**

1.2.1.3 (b) transport links are adequate to serve the development or can be improved to an appropriate standard without an unacceptable impact on amenity, character, or the environment.

During the early 2000s, WSCC and HDC recognised that the road infrastructure this business intends to use for transporting waste is inadequate and requires significant investment/development. It is hoped Liberty’s North Horsham development will address this; although the project has received outline planning approval, the detail of the changes which will be funded by the project cannot be assumed to be met. At the present time, the investment into a revised Langhurst Wood Road entry point from the A264 will be via a new local set of roads through the new North Horsham housing area which also has a provision for a primary school. It clearly is madness to have the hundreds of lorries driving pass these houses/ school, and then trying to navigate around a new roundabout at Mercer Road. It is our view that if such a development is permitted, the applicant should have a condition placed on them to invest in an alternative access route into site for all waste traffic to the incinerator and MBT.

1.2.1.4 (c) where the need for road transport can be demonstrated:

1.2.1.5 ii) vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network.

1.2.1.6 **Vehicle movements are planned to come from 40 miles or more which will impact on roads further afield, including the A24, A23/M23 and roads in adjoining counties not yet understood, such as M6, M25, M20, M27 and A3M. The 2013 Traffic Assessment fails to address and note that data submitted by the developer in previous applications is different to that submitted under this (namely WSCC/018/14/NH and WSCC/021/15/). We cannot see how WSCC can determine whether the application complies with this objective on this point. The data is also 5 years out of date and is not reflective of actuals; the applicant has also not reached the level of traffic it has permitted through its waste transfer business- so this will be an actual loss of amenity to residents once operational.**

- 1.2.1.7 iii) there is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of all road users
- 1.2.1.8 Access to Langhurst Wood Road from the A264 is deemed inadequate and hence the inclusion of a provision for the improvements in the Liberty North Horsham development.

The applicant also states Langhurst Wood Road is not suitable for pedestrians and cyclists because of the permitted traffic/inadequate provisions for pathways/cycle lanes and a 40mph speed limit. The recent planning permissions WSCC/018/14/NH and WSCC/021/15/NH will add to this (as previously stated, these levels have not been reached, nor even close as of 2018).

There is demand for Horsham and Warnham residents to walk and cycle on Langhurst Wood Road, including:

- Commuters using Warnham station
- Graylands workers
- Residents visiting neighbours and attending animals in adjacent fields
- Cycling and running groups
- Residents accessing Warnham's school facilities/church/public house etc.

The traffic incident report is misleading. It is very fortunate that an accident has not happened. There are often near-misses and considerable risk to this ignored/disregarded group of road users.

The recent request to reduce the speed limit on Langhurst Wood Road was declined despite both residents and businesses requesting this action.

Residents, and it seems the applicant, feel it is safer to use a vehicle rather than walk/cycle on Langhurst Wood Road. It cannot be appropriate for WSCC to determine this point has been met by the applicant when they are in fact making the known deficiencies worse. This is surely not sustainable.

- 1.2.2 Paragraph 8.9.6 of the Waste Plan states that "transport assessments should address the achievement of safe and convenient access by all modes of transport, including the encouragement and enabling of an increase in walking, cycling, and the use of passenger transport, and the minimisation of the number and impact of motorised journeys. The impact on all road users including pedestrians, cyclists, and equestrians should also be satisfactorily addressed, including, users of rights of way that may cross the highway and where possible, the provision of safe off-road routes for vulnerable users."

The applicant notes but does not address the inability to walk or cycle safely using Langhurst Wood Road. The reports also suggest there is limited demand for such users and fails to provide evidence of such. Additionally, if the new Parkway station is not built or built much later than the houses of North Horsham, the use of Warnham as a means to commute into London will increase with Horsham expanding as a result of its popularity as a commuter town. This future need has been overlooked.

### 1.3 Strategic objective 8: to protect and, where possible, enhance the special landscape and townscape character of West Sussex

- 1.3.1 Para 8.2.3 from the Waste Plan states “The scale, appearance, and level of activity of waste development can mean that there is likely to be an adverse impact on the character of the County. It is important, therefore, that such impacts are kept to an acceptable level.” Para 8.2.4 says “In the case of major facilities, it may be necessary for a landscape assessment to be undertaken. Particular attention should be given to the design of facilities to safeguard character and the need for techniques of mitigation to minimise the potential impact of proposals”
- 1.3.2 Policy W12 covers High Quality Developments and sets out that “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:”
  - 1.3.2.1 a) integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities;
  - 1.3.2.2 **The sheer size of the development planned will overshadow and intimidate the two adjacent businesses of Wienerberger and the MBT.**

The tallest structure on the Wienerberger site is their scrubber which is 26 metres tall. Their main building is at the tallest point only 10 metres (information provided by Wienerberger). The MBT is of a similar scale. Also, the size of the proposed development means there will only be a very small amount of space between the applicant and the MBT.

**The current site is visually small-scale industrial but with this new development it will become a large-scale industrial site. This is out of keeping with the businesses in and around Langhurst Wood Road.**

The applicant is suggesting a mitigation of the new plant through a landscaping plan of planting trees and wild grassland. It should be noted that firstly, the planting would take 10-15 years or more to become effective screening. We remain unconvinced that there is sufficient space around the building for such planting of trees species. With lorries travelling along the area of proposed planting, it is highly likely that the trees will need to be actively managed to not pose a problem to the lorries, and therefore reduce the screening effect.



In contrast to the site, the surrounding area is ancient woodland and fields used for grazing sheep and horses. 36 private properties with Grade 1 or 2 listing are within 1.5km of the site. Also, of note are the Grade 2 listed park and gardens of Warnham Court within 1km, and the conservation area of Warnham village within 1.5km.

We are therefore of the view that the Landscape assessment that this is of “low/medium” change on the site is flawed, as the plant will become the most dominant building in the landscape. A similar effect will occur in adjoining areas.

- 1.3.2.3 b) have regard to the local context including: (i) the varied traditions and character of the different parts of West Sussex; (ii) the characteristics of the site in terms of topography, and natural and man-made features; (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area; (iv) views into and out of the site; and (v) the use of materials and building styles
- 1.3.2.4 The skyline has not been considered when designing a building which is taller than any local landmark, such as St Mary’s Church in Horsham, with the stack being taller than anything in Horsham.

**The size of the site has meant a horizontal boiler design, which would have resulted in a less intrusive building design, could not be used. The applicant has not suggested any significant mitigation to reduce the permanent visual impact. The views are also heavily reliant on woodland which is not in the applicant’s gift to retain. This woodland will only partially screen the development.**

- 1.3.2.5 The applicant’s photo montages give a sense of the effect of the building on views, but there remain some views which have not been captured at their most significant point. There is also an incomplete sense of what the view will be during Winter as the natural screening is less effective. The building mass is that much greater than anything in the local vicinity. The design is described as being suitable for reducing that mass, but this will not completely mitigate what is a substantial building, which in parts will be significantly taller than anything else in the landscape. The stack is completely out of scale at a now higher height of 95m and will be a visible landmark which does not exist today. The stack will present a view of industrialisation which would be more in keeping with a city or highly industrialised area in the North of the UK and not of a historic market town. The plume will additionally draw the eye. **The applicant, in our view, shows that the size of the development is inappropriate for the site. We also note that views from the train have not been considered at all.**
- 1.3.2.6 The building has been designed, it appears, to solely meet four constraining factors:
- The size of site
  - The optimum capacity of waste the applicant wished to cater for
  - The technology choice/ function and cost

The building design is thought to look cheap, ugly and very industrial – a huge” blot” on what is in the main a rural (with some light industry) landscape.

The public open day presented 2 roof line details only; although some work had been undertaken on the design since the previous application WSCC/062/16/NH, the design remains functional and ugly, uninspiring and certainly not landscape enhancing.

The landscaping appears superficial and not at all sufficient to mitigate the risk to the Great Crested Newts or to provide appropriate buffers between the other businesses to avoid overshadowing/too close proximity. As mentioned earlier, we remain unconvinced that the tree planting is appropriate noting the space available.

1.3.2.7 The applicant has put forward some mitigation by reducing the building height from 43.5m to 35.92m, and a different palette choice. These changes are too small and are deemed by our group to be insufficient to address:

- The development being out of keeping with its surroundings
- The development representing a significant increase in industrialisation of the site and to the surrounding area which will soon be largely residential
- The facility (including stack) being visible from a large number of view points in the wider landscape and or historic designations- some of which are AONB, SSSIs and the like.
- The design remains of poor quality in the view of local residents
- Height, scale and massing has not been sufficiently mitigated and therefore still remains a significant impact on the wider landscape, the character of the surrounding area, heritage asset and visual amenity of current and future residents

1.3.2.8 d) include measures to minimise greenhouse gas emissions, to minimise the use of non-renewable energy, and to maximise the use of lower-carbon energy generation (including heat recovery and the recovery of energy from gas)

1.3.2.9 HGV emissions are the main area in which the applicant has failed to address environmental impacts. Although WSCC have considered the increase in waste brought to site by HGVs, they have not considered the distance vehicles will travel and resultant carbon dioxide production.

**We estimate that transporting waste to the incinerator will result in 507,500 vehicle km/year (based on 32km of waste transport). This equates to 356,300 tonnes of carbon dioxide per annum being produced by the entire operation.**

**This is far more carbon dioxide than is being produced by the current 10 tonne waste transfer and recycling operation. The applicant has provided no mitigation to this because of the extant planning permission for their existing business being applied to the new application. This should be redressed.**

1.3.2.10 The incineration process will generate other sources of emissions, pollutants and dioxins which did not exist before. We do not accept the argument that this application reduces pollution on this site, as there are already other polluting businesses in operation including:

- landfill activity emitting pollutants, such as NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> and

MBT emitting NOx and SO2

The planning application should consider the total pollution impact at a local level, not a theoretical level, to avoid inadvertently creating a localised air quality/ pollution issue. It would be inadvisable to not predict any future air quality issues for such a permanent plant before planning were to be permitted.

Ni4H has been working with UKWIN (UK Without Incineration Network) and note in their assessment of the Carbon Assessment submitted by the applicant to be fundamentally flawed by virtue of not meeting the requirements set out by government in assessing such things. It noted that “...*the incineration facility would be 16,479 tcO2e per annum WORSE than sending that same waste directly to landfill. This therefore does not meet local and national plans and policies in relation to carbon emissions and climate change*”. It also notes that the “...*applicants proposed worse case scenarios could be significantly underestimating the potential permitted emissions from the plant*”

- 1.3.2.11 The CHP option, from the applicant information, appears unfeasible. The electricity would ideally be used by Wienerberger, but the demand may not be sufficient as it is believed the MBT provides some of that demand already. The design is not implicit in terms of how the electricity could be fed into the network and no details of infrastructure has been included in the papers. There is no guarantee that the applicant can meet the EU guidelines of achieving a 3Rs status as a result of its efficiency; if it fails to do so it is not much better in the waste hierarchy terms than landfill. The current waste transfer/ recycling operation would be more beneficial in environmental terms. If the R1 efficiency cannot be met, (D10 status met instead), then waste should only be derived from local sources and not the 40 miles or more radius suggested by the applicant.

We also note that other incinerators in operation at [Portsmouth](#)<sup>ii</sup> and [Chineham](#)<sup>iii</sup> are not meeting the benefits of power generation as outlined in their initial proposal.

#### 1.4 Strategic objective 9: to protect the SDNP and the two AONB from unnecessary and inappropriate development

- 1.4.1 Policy W13 from the Waste Plan covering “Protected Landscapes” sets out that “proposals for waste development located outside protected landscapes will be permitted provided that they do not undermine the objectives of the designation.”

The applicant has provided some views of the Zone of Theoretical Visibility which have a 53-63% level of accuracy on average. They indicate that the AONBs, the South Downs and part of the Surrey Hills are impacted to a lesser or greater extent, but this has not been adequately defined. The 95m stack cannot be mitigated and may yet still be of greater impact as the applicant has noted this may not be the final design. Other similar incinerators such as Portsmouth or the new incinerator being built at Bedding Cross in South London have 2 stacks joined together as opposed to the indicated single stack 2.5ms wide. The red lights on the stack and roof line will additionally present a permanent visual impact for miles around, which will draw the eye to the stack and where visible the plume.

The applicant has made no mitigation to the impact of the Stack (95m) and some mitigation to the roof line of the building. However, there are still going to be permanent visual impacts which will change the characteristic of the landscape. The lighting and plume will add to this.

#### 1.5 Strategic objective 10: to protect and, where possible, enhance the natural and historic environment and resources of the county

- 1.5.1 The Waste Plan contains policy W16 which stipulates that “proposals for waste development will be permitted if there are no unacceptable impacts on the intrinsic quality of, and where appropriate the quantity of, air, soil, and water resources (including ground, surface, transitional, and coastal waters)”

Paragraph 8.7.2 outlines further that pollution could arise in several ways, including through odour, dust, smoke, heavy metals gases, fumes, or leachate.”

- 1.5.2 We believe there is insufficient evidence for WSCC to confirm this policy has been met for the application due to insufficient information in the Air Quality Documentation.

The level of existing contamination is also insufficiently documented/explored, including how contaminants such as asbestos could indirectly affect workers on adjacent sites and residents.

Little detail exists on how this will be managed during the construction phase. There is also insufficient information on the storage and transportation of incinerator bottom ash.

- 1.5.3 The monitoring regime is also a concern. The onus will be on the applicant to monitor and publish its results, with the already overstretched Environment Agency overseeing the process. **If an incident happens, or the monitoring systems fail, it is unclear what impact this would have on the residents of Horsham, particularly those closest to the site.**

- 1.5.4 In addition, there is no information on how the food chain will be protected. Both at Langhurst Wood Road and the surrounding area there is arable farming.

Pollution from the site could enter the food chain and result in health implications for humans ingesting this food. There is also the potential for the incinerator to impact on the livelihoods of local farmers, if consumers feel so concerned about their own health that they avoid eating meat from animals farmed near an incinerator.

- 1.5.5 Policy W11 notes that 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 and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics); and (b) the separate identity of settlements and distinctive character of towns and villages (including specific areas or neighbourhoods) and development would not lead to their actual or perceived coalescence.

- 1.5.6 It is our view that the sheer size and bulk of the building being proposed by the applicant will have an unacceptable impact on the character and distinctiveness of the area. The site was originally in a small Hamlet called Graylands which was historically wooded and farmed. The clay mining and associated brick works in the early 1900s was the initial form of industry in the area. The areas towards the old Graylands farm/ now Graylands manor house is now a small/ light business area with some residential. The business areas are heavily screened in the main leading the overall sense to be of rural countryside. With North Horsham strategic housing site now having been approved, the area closest to the A264 will become more residential in nature with great care towards the Graylands Moated site to reduce the intensity of housing to support more outdoor enjoying land uses such as walks, allotments and a quiet graveyard area.

This will be opposite what will become a clearly visible Industrial area which will be totally incongruous to the landscape and history of the area. Placing such a large-scale facility in a place such as this, is not as easily accepted as places such as Portsmouth, or Teesside where there are historic and existing large scale industrial activities taking place, with large scale factories/ power stations already in situ. If such a facility has to be located in this site, it should not be visible at all, and be no larger than current facilities on site.

- 1.5.7 Policy W15: Historic Environment Proposals for waste development will be permitted provided that: (a) known features of historic or archaeological importance are conserved and, where possible, enhanced unless there are no alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features; (b) it would not adversely affect currently unknown heritage assets with significant archaeological interest; and (c) where appropriate, the further investigation and recording of any heritage assets to be lost (in whole or in part) is undertaken and the results made publicly available.

Although there are some considerations of the conservation/ protection/ recording of the existing kilns on site, there is little consideration of the site known as Graylands Moated site. This is a 12th century Motte and Bailey castle. This site is not accessible at the present time but may well be with the North Horsham development. From this site, the stack and plume are going to be visible and will detract from the enjoyment of such a historic asset. View point 18, is not representative of this site, as this is the other side of the moated site and directly opposite the Brickworks/ Biffa and Britaniacrest site.

## **1.6 Strategic objective 13: to protect and where possible, enhance the health and amenity of residents, businesses and visitors**

- 1.6.1 Policy W19 states that “proposals for waste development will be permitted provided that: lighting, noise, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity.”
- 1.6.2 Residents would like to wait for the publishing of a report Public Health England has commissioned on incinerators (due in 2018) to assess the risk to health. Other studies undertaken to date have not been extensive enough.

**We assert that without this report WSCC cannot guarantee there is no impact on public health for current residents and the 2,750 new residents of the proposed North Horsham housing development. The information provided by the applicant does not evidence that there will be no impact; in fact, it is unclear what it is showing other than that the overall good health of Horsham. It is hoped that the applicant is not suggesting that a small change in that overall health by virtue of this plant is therefore acceptable.**

The plume modelling, we have provided (attached at the end by Plume Plotter) shows that Warnham, Langhurst Wood Road/ Holbrook and North Horsham will be the most affected by the plume.

Carbon dioxide and other emissions from HGV traffic will affect residents for 40 miles or more.

**For Langhurst Wood Road and the A24/A264 the total emissions from diesel engines and petrol is not known. The existing traffic assessment data is over 5 years old and not reflective of the current state of traffic. However, the current levels of HGV traffic are deemed too high by residents both in terms of air quality and noise/dust.**

The numbers of residents who will experience this loss of amenity will be increasing as North Horsham residential and business areas are developed in the coming years and certainly at the point when this plant is planned to become operational.

We have already drawn your attention to the fact that traffic resulting from a previous planning permission is not the norm, so the impact is not yet felt. This means even traffic assessments done more recently for the North Horsham development do not consider the increased level of traffic because of the “future needs” permissions granted in 2014/15.

- 1.6.3 Impacts of the total noise, lighting, dust and other emissions from the waste sites and brickworks have not been adequately assessed for the residents living in Langhurst Wood Road/ Station Road, and also those living close to adjoining roads such as the A24/ Warnham etc.

- 1.6.4 Proposed operating hours for the incinerator are 24/7 which is an extension to existing nuisance to local residents in terms of noise, lighting and traffic from shift workers.

The lights on the stack will be a permanent visible intrusion to residents which cannot be mitigated by virtue of the location close to Gatwick airport. If the stack is supported by cabling, there will be a high-pitched whistling noise as wind moves around the stack and cabling which will provide a new annoyance/disturbance for residents. The result will be an increase in background noise for those residents closest to the plant such as Station Road and Langhurst Wood Road trying to sleep.

- 1.6.5 Visible plumes will be unsightly, creating an inappropriate “highly industrialised” view of the town during the day and at night.

The documentation does not mention or calculate night-time plumes.

Lighting from the railway, the business park itself and the aircraft avoidance lights/ incinerator outside lights will illuminate the plume and thus making the visual impact more noticeable during the darker hours.

The plume has not been extensively modelled and should be extended to more receptors.

- 1.6.6 HGV traffic is already a noise issue for residents.

Houses suffer from vibration and dust/dirt. This is at odds with the rural nature of this part of Horsham/ Warnham. The area is not yet highly populated and is still surrounded by fields/animals and ancient woodland. The approval of North Horsham now creates a greater impact to a greater number of receptors.

The existing business areas are offices or light commercial enterprises in the main. Efforts should focus on not over-industrialising this area, especially if it does become more residential in nature. This will just generate a significant conflict in land use.

- 1.6.7 Odour may be an issue.

The current waste processing activities do generate regular and significant odours despite mitigations/ conditions being put in place. This is a loss of amenity to residents and completely unacceptable. On days when odours are apparent, enjoying the outdoors is untenable and odours take a number of days to dissipate.

The issue of unpleasant odours is being raised with the Environmental Agency and Biffa most days. Residents are concerned that the new incinerator will add to this as the same or similar mitigations are being suggested as are in place at the MBT. Odours are a condition for the existing waste businesses. As the population increases through the North Horsham development, so will the acceptability of such a loss of amenity. Those wanting to make use of the outdoors (such as the new allotments, nature walks/ bridle paths) will experience a loss of enjoyment as a result of the odours.

**1.6.8 24/7 operating hours will also be a loss of amenity to residents.**

During the construction phase, early morning and late working during the week needs to be constrained to ensure that residents' quiet family lives are not impacted disproportionately by noise/ traffic and light pollution.

Weekend working should also be avoided where possible, or reduced to a minimum, with no heavy machinery use to make sure that residents can have adequate time to relax and enjoy their home life.

Bank holiday working should not take place at all, except if there is an emergency/ threat to life, health or the environment.

Operating hours need to be in line with current permissions held by waste businesses on this site.

HGV movements need to be reduced where possible by more efficient coordination of vehicles. Current HGV movements are felt to be too much and should not be allowed to get any worse.

Light pollution is also a concern, as cranes will need lighting for the safety of aircraft within the area.

A view of the [Beddington Cross construction site](#) is a large concern for residents who wish to sleep during the 3 years of construction. The Waste Plan sets out that where necessary a site liaison group is established by the operator to address issues arising from the operation of a major waste management site or facility. Although groups such as this exist, there remains a number of problems with swiftly and adequately addressing local issues such as odour, noise, flies etc.

The liaison meeting will be key during the construction phase to ensure that the construction mitigation measures for traffic, noise and dust are addressed swiftly and sympathetically.

**1.6.9 The residents have been trying to address the issue with rubbish littering Langhurst Wood Road/Mercer Road junction which is still not adequately resolved by either Britaniacrest or Biffa or the local authority.**



The waste is clearly because of the commercial operations and not household waste. It also generates an additional cost to the local authority/ tax payers. Confidence is therefore low that this mechanism can solve local issues adequately or swiftly.

We are also of the view that a new or joint resident's liaison group will be needed with whomever Britaniacrest appoints as the builder and operator of this incineration facility.

## 1.7 Policy W21 covering cumulative impact

1.7.1 The policy W21 sets out that "proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result from waste management and other sites operating simultaneously and/or successively. Phasing agreements may be sought to co-ordinate working, thereby reducing the cumulative impact."

1.1.1 This development has a much greater impact in terms of waste-derived processing and management for the local residents, including:

- Impact to local roads and national roads
- More odours
- Poorer air quality
- Potential impact to livestock being farmed south of the site

**Now that North Horsham development has been approved, the land use assessment for waste needs to be re-considered for an increased and impacted resident population. There will be a significant increase in land conflict- residents of the new development will be looking for green open areas/ good quality air and noise levels. Living very close to an incinerator with its associated level of waste traffic/ pollution is not going to be at all desirable.**

The North Horsham development timescales also need to be considered. Although indications are that the area closest to the development site is 10 years off, there is insufficient information on when the road improvements or school building may take place.

If this happens within the 3-year construction phase of the development, or not long after, it will make the lives of residents close to the new development miserable for a disproportionately long length of time. This has not been considered by the applicant at all. Additionally, HDC have on 6<sup>th</sup> April began a consultation period for the Local Plan which sets out the locations of Graylands and Broadlands sites to the north of this site as areas for development of employment. If adopted, there will be more traffic, more conflict by virtue of small industrial use (start-ups and the like) contrasting severely with an oversized bulky highly industrial plant such as this.

## 1.8 Strategic objective 14: to minimise carbon emissions and to adapt to, and to mitigate the potential adverse impact of climate change

1.8.1 The proposal gives inadequate consideration to the impact of emissions from vehicle movements over long distances as a result of the future traffic/ waste processing planning sought in 2014/15 for a different kind of waste processing. This could be effectively mitigated using rail or locating incinerators closer to the sources of the waste itself. The data is also different from that used in the previous planning applications for increased vehicle movements and was based on 2013 data. Langhurst Wood Road not only has significant HGV traffic from waste and brick businesses, but also has a lot of distribution or delivery HGV traffic using the road as a cut through or to access the businesses at Graylands and Broadlands business park/ Home Office. With no provision for cyclists, public transport or pathways, there is a greater use of motorised vehicles to access Langhurst Wood Road/ A24. There are no buses, and little provision for the secure storage of bicycles at Warnham Station.

1.8.2 The case made by the applicant is that the incinerator should be compared to a landfill operation. In theory this stacks up only if a number of assumptions are met:

- This is a highly efficient 3Rs facility making all use of heat and electricity generated as a by-product (see section 2 comments)
- Waste sources are genuinely being diverted from landfill (i.e. they are not recyclable/ reusable materials which could be treated using processes higher up in the hierarchy)- there is some concern that there is insufficient space to recycle the 50,000 tonnes per annum of waste on site, and that a proportion of recyclable material will not be burned.
- Waste is taken to the closest and appropriate waste processing site as possible (i.e. commercial incentives are not a deciding factor for waste treatment)- we are of a view this may not be met
- Sustainable transportation is used to reduce transport related pollution/ environmental damage- we are of a view this won't be met
- This plant is located in the optimum location based on waste sources, waste processing shortfalls in the area, road capacity and impact on the surrounding environment/ planning policies- there is no evidence to support the applicant has analysed this nor considered other locations in West Sussex. The locations will have been decided purely based on commercial considerations for the investment decision made.
- The applicant has used the right approach to assessing the carbon assessment as set out by the government.

Ni4H notes that UKWIN experts have raised a number of deficiencies in the carbon assessment submitted by the applicant and that in their view the incineration facility would be worse than sending that same waste directly to landfill.

## 1.9 [Horsham District Planning Framework \(2015\)](#)

1.9.1 In November 2015, HDC adopted the Horsham District Planning Framework. We suggest that the proposed development does not comply in the following areas:

Policy	Comments
Strategic policy 1	<p><b>The development should improve the economic, social and environmental condition.</b></p> <ul style="list-style-type: none"><li>• The number of new jobs created by this development is minimal and is likely to require experienced workers to move into the area. From a social and environmental perspective, this development creates a disbenefit for Horsham.</li></ul> <p>This development is also completely at odds/ creates conflict with the HDC strategic site for new housing at North Horsham which followed after the Waste Plan in 2014 which suggested at that time this site could potentially take additional waste processing. The planning policies within the WSCC Waste Plan still need to be addressed before approval is given.</p>
Strategic policy 2	<ul style="list-style-type: none"><li>• This development does not maintain the district's unique rural character, which was rural and agricultural in nature.</li><li>• It is not sustainable as a result of overcapacity issues (requiring waste to be bought from further distances) and diesel HGV transportation over significant distances and crossing county boundaries.</li><li>• The development does nothing to enhance the market town's market history nor does it safeguard its attractiveness. The development, as a result of its sheer size and bulk, will lead to a perception that the town is an industrialised centre more in keeping with highly industrialised areas, such as Sheffield, Teesside, Portsmouth or a very large conurbation.</li><li>• The site is inappropriate for this kind of development. Great care needs to be taken as the site is on the edge of Warnham village, and the rural boundaries of Horsham itself. There is still farming and a rural feel to parts of Langhurst Wood Road, and significant areas of ancient woodland will conflict with the land use in this new development.</li><li>• The strategy notes a desire to enhance environmental quality, including air, and to minimise energy and resource use. Although Horsham has a good level of air quality, there is no data for this site/area around Langhurst Wood Road and Station Road. It already has business operations which are contributors to reducing air quality, and a very high level of traffic on the rural road with proximity to A264/24. The development will further add to this issue.</li><li>• In terms of reducing carbon emissions, at a theoretical level it will as it supports the zero to landfill strategy. However, the transportation of waste over long distances and the emission released from the incineration of waste will result in greenhouse gases being released. These gases combined with the landfill, brick works and general vehicle activity in the area is not insignificant. Brookhurst Wood also has the landfill workings for the foreseeable future, albeit in restoration phase.</li></ul>

Policy 24- Environmental protection	<p><b>Developments will be expected to minimise exposure to and the emission of pollutants including noise air and light by appropriate placement, measures to minimise air pollution and greenhouse gases to protect human health, but also to maintain or reduce the number of people exposed particularly where vulnerable people would be exposed.</b></p> <ul style="list-style-type: none"> <li>• North Horsham development has been approved leading to a greater level of exposure to the current and new pollutants for a significant level of local residents.</li> <li>• The HGV trucks (some of which will be carrying harmful chemicals and materials to and from the incinerator) are likely to be travelling on a new road outside a new primary school. This strategy is not met by this development.</li> <li>• We note UKWINs view that the Carbon Assessment and potentially the Air Quality assessment is flawed leading to an over optimistic view being put forward. In the view of UKWIN, this plant will be worse than landfilling.</li> <li>• Noise will also increase to those closest to the development from the 24/7 operation of such a plant.</li> </ul>
Policy 25- The natural environment and landscape character	<ul style="list-style-type: none"> <li>• This development will impact the existing skyline by becoming the largest permanent landmark in Horsham.</li> <li>• It will present a permanent industrial view of the town which is not characteristic of its history.</li> <li>• The development (largely the 95m stack with plume) will be visible from the South Downs. This will not lead to the preservation nor enhancement of the setting.</li> <li>• The visual impact will grow if any of the present wooded areas are removed. This should be considered carefully bearing in mind the level of permanence this development suggests.</li> <li>• It is our view that the assessment of visual impact is not accurate and taken cumulatively is also not accurate.</li> </ul>
Policy 26- Countryside Protection	<ul style="list-style-type: none"> <li>• The sheer scale of this development will lead to an over industrialised feel to this rural area and by virtue erode its countryside character and location</li> </ul>
Policy 30- Protected Landscapes	<ul style="list-style-type: none"> <li>• There is a significant and permanent impact to the protected landscape areas of the South Downs, AONB and SSSIs. There is no justification which exceeds the loss of amenity (both today and in the future) in terms of public interest.</li> </ul>
Policy 32- The quality of the new development & national planning policy framework 2012 (NPPF), paragraph 17	<ul style="list-style-type: none"> <li>• This development is not at all attractive and the site has not been significantly enhanced by virtue of the majority of the site being covered by the over-sized building.</li> <li>• The landscaping proposal on site is overstated, and the tree planting may not even be possible by virtue of the space in which it is being suggested they will be planted on the road the lorries will need to take. The screening will take a significant time to establish.</li> <li>• There is NO mitigation to the views experienced by those using the Horsham to London train via Warnham.</li> </ul>
Policy 33- Development principles	<ul style="list-style-type: none"> <li>• The development has not avoided harm to the amenity of residents/users in nearby properties/businesses adequately.</li> <li>• The sensitivities and conflict of land use have not been addressed. The building will overshadow and intimidate the existing businesses of Wienerberger and WSCC/Biffa MBT.</li> </ul>

	<ul style="list-style-type: none"> <li>• The scale and appearance of design is not of high quality and has been squeezed into the site parameters. There is little space between it and the MBT.</li> <li>• The view from the railway has not been considered at all, and the building will exceed the tallest landmark in Horsham.</li> <li>• The visibility of the building and its stack is likely to be seen more than 20km away, and from key sensitive areas.</li> </ul>
Policy 34- Cultural and Historical assets	<ul style="list-style-type: none"> <li>• The impact of the proposed development does not seek to enhance the areas surrounding some very key cultural and historical assets close to the site. Areas such as the Graylands Moated site and Warnham will experience a visual impact from this development of a permanent nature. This will detract from the assets themselves.</li> </ul>
Policy 40- Sustainable transport and NPPF paragraphs 29-41	<ul style="list-style-type: none"> <li>• There is no consideration of non-car modes which will add to an already pressured transport infrastructure along the A24/264 and Langhurst Wood Road. The latter is no longer safe for pedestrians and cyclists so there is not choice of transport modes. (The applicant's view confirms this too.)</li> <li>• The railway option has been dismissed despite the site being adjacent to the rail links.</li> <li>• The transportation of waste across long distances (40miles +) is not sustainable over a 25-year period.</li> <li>• The plan Langhurst Wood Road changes as part of the North Horsham development will see lorries passing a newly built housing estate and primary school. This needs re-thinking with a consideration of a waste specific access road being built as part of this development to provide a HGV friendly access road directly to site.</li> </ul>
Policy 41	<ul style="list-style-type: none"> <li>• We do not think the site provides adequate parking facilities.</li> <li>• There are no details for how all visitors/workers will be able to travel to site without using their cars, HGVs, or coaches- this does not support non-motorised sustainable transportation options.</li> </ul>
National Planning Policy for Waste 2014, paragraph 7	<p>Paragraph 7 - Planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need.</p> <p>Ensure that the facilities are well-designed so they positively contribute to the character and quality of the area in which they are located</p> <ul style="list-style-type: none"> <li>• The development does not meet these requirements.</li> </ul> <p>This particular site was described as a strategic allocated site in 2014. However, the Strategic Site of North Horsham was allocated in late 2015 and achieved planning approval in March 2018. This presents a very different context for the allocated site for more intense waste processing. We are of the view that this strategic allocated site no longer makes sense for proposals such as this for such large-scale incineration. It is our view, that waste processing should reduce in line with the reduction of landfilling activity seen in the past years in this site.</p>
Planning Practice Guidance para 47	<p><b>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,</b></p>

	<p><b>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.”</b></p> <ul style="list-style-type: none"><li>• The increase in residents as a result of the North Horsham development must be taken into account.</li><li>• Please see the residents’ objections and this overall objection pack as evidence that we are not content with the WSCC expansion of waste disposal facilities in this area.</li></ul>
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## Section 2: Other Issues with the application.

### 1.10 Energy from Waste/ “waste recovery” vs. incineration

1.10.1 The definition this development proposal can only be done so by referring back to the EU Directive 2008/98/EC, the Waste Framework Directive. This Directive sets out the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products.

From the “Guidelines on the interpretation of the R1 Energy Efficiency formula for incineration facilities dedicated to the processing of municipal solid waste according to Annex II of Directive 2008/98/EC on Waste” (European Commission) we note the following:

*“The Directive allows municipal waste incinerators **to be classified as recovery operations provided they contribute to the generation of energy with high efficiency** to promote the use of waste to produce energy in energy efficient municipal waste incinerators and encourage innovation in waste incineration. In this context, it is important to note that “recovery” means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy (Art 3 (15) of the WFD). The non-exhaustive list of recovery operations presented in Annex II of the WFD defines R1 as a recovery operation which is understood as “Use principally as a fuel or other means to generate energy”. It is clarified in footnote (8) that this includes incineration facilities dedicated to the processing of municipal solid waste (MSW) only where their energy efficiency is equal to or above:*

- *0.60 for installations in operation and permitted in accordance with applicable Community legislation before 1 January 2009,*
- *0.65 for installations permitted after 31 December 2008 “*

1.10.2 We note that the proposal fails to demonstrate it meets the definition under R1 for the installation to be defined as a Recovery operation as we calculate the resultant energy to be around 25% and unlikely to achieve the 65% needed under the 2008 Directive. Although the applicant estimates it could produce 21 MW of Electricity for the National Grid, it fails to demonstrate a demand for heat from either the industrial or resident population.

If the proposal is not recovery, it cannot be defined as a Recycling, Recovery and Renewable Energy development as this is mis-leading to the public. It is a recycling

(Britaniacrest Recycling Limited) and burning of waste operation (new operator to be announced); the latter of which is defined under the same Directive as “disposal of waste by incineration on land” under D10-Annex I (1). It is our view, that any disposal of waste under this Directive has to be subject to the proximity principle in a way a recovery operation does not have to be.

- 1.10.3 In support of our view further, we note from the Capel High Court Judgement (Case number CO/5684/2008 & 0510/2009) presided by Mr Justice Collins hearing Capel Parish Council vs Surrey County Council in relation to a very similar proposal for an incinerator which failed to meet the R1 criteria to be defined as “recovery”/ Energy from Waste) that sections 39-41 are just as relevant to this application. It notes, that similarly, the plans for a recovery operation was actually disposal in nature as a result of the R1 criteria not being met, and that Surrey County Council failed to apply the proximity principle and seek to ensure that waste would be disposed of at the nearest local installation. It cannot be argued that waste from the southern counties should be DISPOSED of “locally” in Horsham. Unless, the applicant can evidence that it can meet the R1 criteria and sufficiently recover energy from the burning waste, it should be REFUSED outright as it does not meet the description of what it intends- i.e. to “recover” waste. If the applicant wishes to resubmit an application for an incinerator/ disposal of waste facility using thermal treatment, it will need to comply with the proximity principle and be sized according to the needs of West Sussex.
- 1.10.4 Our points under section 1 of our original objection, relating to the origins of the waste, therefore must be given greater emphasis. It is indefensible under the Directive, and the UK's adoption of this Directive in its domestic waste legislation, to import/ transport waste over long distances to dispose of it especially when by doing so there is an impact to the environment and human health. As previously stated, this contravenes West Sussex's own policy as set out in its own Waste Plan.
- 1.10.5 **The other relevant aspect to whether this development proposal fails to meet the criteria for recovery rather than disposal of waste by incineration, is the waste hierarchy. Disposal is the least environmentally effective way of dealing with waste- only marginally better than landfill. The applicant, by suggesting this development is “recovery” is seeking to suggest its waste treatment is higher up the waste hierarchy, which it fails to evidence by being unable to demonstrate it meets the R1 criteria.**

## **1.11 Potential electrical cogeneration to the National Grid**

- 1.11.1 Although there is a confident statement and forecast for electricity which might be produced from the incineration of waste, the applicant fails to provide any detail of the infrastructure required. We note in a pre-planning letter dated 20.12.15 from Michael Elkinton that the technical details should be provided as part of the planning application, but this has not been submitted. We would seek answers to the following:



1. Confirmation that there is agreement in principle that UK Power will provide demand of 18-20 MW continuously
2. The details of the agreed voltage level to be generated, and the method of transmission, i.e. overhead lines, buried cables etc.
3. Given that 18MW represents about 30% of the Horsham area standing load, the agreed physical location where this demand will be provided by the grid.
4. The intended route of the transmission method under point 2 above if the connection is remote, the intended route between the on-site substation and the locations under point 3 above.
5. As requested on 20/12/15, which party will design the route under point 4 above and if further planning applications or wayleave requests are anticipated by either party.

## 1.12 Ownership of the site

1.12.1 It is currently unclear to residents and the members of Ni4H who the legal owner of the land is, which is the subject to this planning application. For this current application, the owner is noted to be Wienerberger Ltd. Under previous application WSCC/018/14/NH the owner was noted at Certificate A as Wealdland Ltd care of Macfarlanes. In some of the documentation submitted by the applicant, such as Chapter 4 para 4.23.5 there is a suggestion Britaniacrest/ the incinerator operator owns the site- *"... as the site is within the applicant's ownership..."*

If there is a need to raise any public or private nuisance, then it would be important for the ownership to be made clear. Wienerberger have confirmed they do not own the site which Britaniacrest operates from.

## 1.13 Impact of Wake Vortices on the dispersal of pollutants in the local vicinity of the proposed incinerator

The impact of aircraft movement on the dispersal of pollutants/ plume behaviour has not been adequately assessed. Specifically, in the case of (Capel\_Incinerator\_Fact\_Sheet)<sup>iv</sup> incinerator, there was no consideration of the impact of wake vortices which would result in driving the dangerous emissions back down to ground level and thus undoing the primary purpose of the excessively tall chimney stack/ emission treatment technologies. Consideration of the consequences of wake vortices should also consider future changes to flight paths, increase in aircraft traffic and changes in Govt policy in expanding Gatwick Airport.

### Section 3: Ni4H overarching objections

Item	Objection	Detailed comment
1	The site is physically inadequate for the development proposed	<ul style="list-style-type: none"> <li>• The design is constrained by the size of the site. A horizontal boiler cannot be implemented on the 3.5-hectare site. The resulting 36m tall (100x119M) building with 95m stack is wholly disproportionate for the site and the town within which it will be located.</li> <li>• The applicant has suggested it is unable to “sink” the building significantly as a result of the size of the development and site boundaries. Therefore, it is the wrong site for what the applicant wishes to achieve without an adverse visual impact to the landscape.</li> <li>• Alternative technologies and other sites have not been adequately considered.</li> </ul>
2	The building design, size and location will create an eyesore for miles around including at sensitive and protected areas. This will be detrimental to the quality of the landscape and lead to an over industrialised view of the town and surrounding area.	<ul style="list-style-type: none"> <li>• The building design is ill-considered and not of a visually acceptable form. The materials, size and form make the building intimidating. It will overshadow existing businesses on site and impact the skyline in a harmful way becoming the tallest landmark in Horsham. It will also create a heavily industrial view for Horsham, which does not reflect the town’s historic or current character.</li> <li>• The applicant’s studies do show an impact on sensitive areas - the Surrey Hills and the South Downs - which should be protected at all costs. The building and stack height is inappropriate in this context.</li> <li>• The site is dependent on wooded landscape to mitigate visual impacts both in close proximity to the site and over a wide area. The wooded landscape is not within the gift of the applicant to retain, and this should be considered bearing in mind the permanent nature of the intended development.</li> <li>• The photo montages are still advantageously placed in some locations, and the description of the impact is not correct in our view. The cumulative overall impact is also not assessed accurately. For those wishing to live or work in the Strategic Site of Horsham, view points 3, 21, 22, 23, 24, 25 and 26 show a significant impact in terms of the taller stack of 95m. If the design of this stack changes this may get even worse. The view points show the permanent feature as residents make use of a footpath to access greener areas/ the countryside. Warnham will also get a significant view at view point 6, passed the church at view point 7, 11 (not shown on map), 12, 13 and 14, 15 and 17. The view from the station along the train line at Warnham is missing. The view point</li> </ul>

		<p>heading towards the Great Daux roundabout on the A24 is also missing. We also note many shots have been taken focussing on the tallest trees at that point somewhat advantageously. Kingsfold will also experience a reduction in landscape quality as per viewpoints 28 and 29.</p> <ul style="list-style-type: none"> <li>• We note a key assumption has been made with the Theoretical Zone of Visibility that there is vegetation of 12m and buildings of 9ms. In many places, with this being a largely rural area of fields and a few houses, this assumption does not hold in its entirety.</li> </ul>
3	The waste source extends significantly beyond West Sussex's waste needs and so is contrary to the West Sussex Waste Plan and unsustainable.	<ul style="list-style-type: none"> <li>• We note the intention of the applicant to import of waste from outside West Sussex for 25 -30 years; something the Waste Plan does not support.</li> <li>• The applicant suggests a 40-mile radius for waste collection but promotes a customer base of over 100 miles on their website. This is not sustainable and does not add to West Sussex's net self-sufficiency vision. There would be a limit to the controls West Sussex could impose on the importation of waste, and this may not lead to any county specific improvement in the shortfall in C&amp;I waste management or reduction of landfill requirements.</li> <li>• The Committee should seek a better justification and reinforce their stance that any proposal should only deal with West Sussex waste. Any imported waste will need to be justified on a sustainable and case-by-case basis. This is clearly set out in the Waste Plan as a set of waste management principles.</li> </ul>
4	Sustainable methods of transport are not being used	<ul style="list-style-type: none"> <li>• The applicant has not made sufficient effort to incorporate the rail transportation link, which is adjacent to its site. This will result in an estimated 507,500 vehicle kilometres or more. The inability to limit the distance waste will be moved will reduce the air quality in the area/lead to vehicle-emission-related health conditions.</li> <li>• There is insufficient data to understand the overarching impact on the roads used by the waste transportation vehicles. The transport assessment data is over 5 years out of date and does not include the MBT traffic and other recent distribution businesses using Langhurst Wood Road/ A264/ A24. It also does not map the impact on the feeding roads because the source of waste is from a 40-mile radius or greater. The hazardous waste will also be transported to Cheshire.</li> </ul>
5	West Sussex aims in its Waste Plan to protect and where possible, enhance the health and amenity of residents, businesses and visitors- this cannot be guaranteed by virtue of the resultant	<ul style="list-style-type: none"> <li>• The Planning Authority has a duty of care to residents to establish whether the effects of incineration could breach recommended levels of pollutants and toxins before allowing this development. This needs to be assessed in conjunction with existing businesses and traffic. Information to enable such a review is not complete nor sufficiently localised.</li> <li>• There is very genuine public concern that incineration creates serious health risks. Many people believe that a precautionary approach should prevail in matters of health. Supporters of</li> </ul>

	<p>and cumulative pollution, land contamination and air quality</p>	<p>incineration say “there is no proof” of a link between incinerators and serious health problems. However, nobody really knows what long-term effect waste incineration will have on residents’ health, as relevant long-term studies have not yet been published. The US National Research Council has warned that the risks from incinerator-generated dioxin pollution to nearby communities is “substantial”. The proposed site is likely to affect vulnerable parts of society such as the children at the proposed primary school in the North Horsham development, which is on the direct route of the incinerator traffic.</p> <ul style="list-style-type: none"> <li>• All waste incinerators are widely accepted to produce poisonous emissions, including dioxin, heavy metals like mercury and lead, and fine particulates (that aggravate breathing problems). People are affected by breathing contaminated air, eating contaminated food and touching contaminated soil. A guarantee cannot be given that there will be <b>NO</b> impacts on health as a result of an incinerator.</li> <li>• Local concerns on health impacts of incinerators relate to whether air emissions might lead to local breach of Air Quality standards, and whether dioxin and other toxin emissions (to air and in ash) might cause the Tolerable Daily Intake (TDI) to be exceeded. This is exacerbated by: <ul style="list-style-type: none"> <li>• awareness that licence conditions are sometimes breached</li> <li>• doubt regarding the control regime</li> <li>• awareness that breaches would not be detectable by smell</li> </ul> </li> <li>• The level of concern is heightened by the view that risks are poorly understood by science, that effects can appear over a long time and cause irreversible damage or terminal disease, and that children and future generations are at risk.</li> <li>• Many people in West Sussex, and in particular Horsham, are aware of continued compliance and regulatory failures at existing waste treatment sites (e.g. complaints to EA and public meetings regarding Langhurst Wood Road Landfill Site and MBT, Britaniacrest transfer and recycling operation in Horsham, Greenpeace report “Criminal Damage; a review of the performance of Municipal Waste Incinerators in the UK”) and are concerned at the potential for harm from incineration processes.</li> <li>• Concern is particularly well-founded regarding risks from fly-ash produced by incinerators. It is not inconceivable that waste lorries could be involved in accidents, and therefore pose a risk because of hazardous load being emptied.</li> <li>• It is not sufficient to assume that risks will not arise and will not need to be assessed/ managed, that the regulatory regime will be satisfactory and no further consideration is required. The planning system assumes that the pollution control regime will work effectively, and to take advice from the Environment Agency on associated risks). This is not reasonable, contrary to due diligence,</li> </ul>
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		<p>and ignores known failings in the regulatory regime (e.g. The National Audit Office has censured the Environment Agency (EA) for failing to police its licences, and staff reductions at the EA could lead to this failure continuing or getting worse). There is a responsibility on waste planning authorities to satisfy themselves <b>beyond reasonable doubt</b> that incinerators can operate within legal limits. The applicant has no experience of operating such a plant.</p> <ul style="list-style-type: none"> <li>• The applicant has advised the Residents Liaison Group that an overseas multinational company is likely to make use of this permission to build and operate the incinerator.</li> <li>• Incineration processes produce toxins. Toxins are controlled by permitted emission levels but: <ul style="list-style-type: none"> <li>• Permitted does not equal safe but allowed on a balance of judgement about risk to health based on available knowledge on TDI and maximum contamination levels in food and feeds. (TDI has already been reduced tenfold following disparity between limits set by the US and EU. TDI-dioxin 2pg WHO-TEQ/Kg of body weight/day from all sources (reviewed by the Committee on the Toxicity of Chemicals in Food, Consumer Products and the Environment in 2001). The WHO-TEQ = World Health Organisation toxic equivalent concentration is a measure of the overall toxicity of a mixture of dioxin congeners. 1pg or picogram is 10<sup>-9</sup>g or 1 millionth of one millionth of a gram.)</li> <li>• Judgements are made on available rather than complete information (“it is generally accepted that emissions standards are based on what can be measured and what is technologically achievable, rather than what is safe...This point was accepted by the Environment Agency” Dept. of Environment Transport and Regional Affairs Committee, March 2001 report HC39-1, Delivering Sustainable Waste Management, volume 1, paragraph 93).</li> </ul> </li> <li>• No evidence is available to demonstrate the cumulative, long-term effects of incinerator emissions, including persistent ones like heavy metals, furans and dioxins, on human health at the continuous low dose exposure an incinerator creates. The health effects which result from an incinerator’s emissions are not yet fully known, and the regulation of incineration has been rather poor, which has resulted in poor practices developing in some incinerator sites (Dept. of Environment Transport and Regional Affairs Committee, March 2001 report HC39-1, Delivering Sustainable Waste Management, volume 1, paragraphs 97/98).</li> <li>• Controls are applied to limit emissions of some chemicals injurious to health, but there is debate over what is a safe level of exposure. The Environment Agency is reported as telling the House of Commons Environment Sub-Committee that they have no idea how dangerous the new generation</li> </ul>
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		<p>of incinerators will be to human health (The Guardian, 29 November 2000). Environment Minister Michael Meacher told the House of Lords Select Committee on 15 June 1999 that “Incinerator plants are the source of serious toxic pollutants; dioxins, furans, acid gases, particulates, heavy metals... there must be absolute prioritisation given to human health requirements... we know scientifically that there is no safe threshold below which we can allow such emissions.”</p> <ul style="list-style-type: none"> <li>• An extensive study was commissioned by Public Health England on the health implications of incinerators. This is due to be published. This study should be received and understood before any planning applications for incineration are considered. The residents would also like to understand what happens when the UK leaves the EU, as the current environmental legislation will no longer be enforceable without new domestic legislation in place.</li> </ul>
6	Impact of the previous planning applications WSCC/018/14/NH and WSCC/021/15/NH	<ul style="list-style-type: none"> <li>• It is clear from Britaniacrest’s own data that the current operation of recycling and transferring of waste would not need the additional permission both of waste volumes and associated HGV movements. It is now clear that these permissions were in preparation for the incinerator derived waste and resulting movements. The permission needs reviewing in light of what it is actually for, and to consider the current traffic/waste processing in the vicinity of the site.</li> <li>• The December 2013 traffic data is now 5 years out of date and does not incorporate significant developments such as the MBT adjacent to this site, which started operating after 2013 or the permitted (but not yet used) number of movements Britaniacrest has achieved through previous planning applications in preparation for this new plant. The incinerator will also operate on a different model, and so the broader transport infrastructure needs to be considered as waste is being brought across longer distances.</li> <li>• Associated with this, the information about the impact of diesel engines has become far more damning since 2013. The emissions from these vehicles are now known to be far more damaging than at the time the permissions were granted. The residents suffering the traffic of Langhurst Wood Road, A24, A264 already believe the current levels of traffic are too high and the exposure to poorer air quality too great.</li> <li>• We note only 80 HGV movements from the applicant (actual and at busiest time), as opposed to 284 per day allowed now as part of the 2015 permission that is not yet experienced. Residents would ask that this is reviewed as part of this application, as it cannot be justified not to do so. The committee should look to enhance and not add to the deterioration of air quality for residents by ensuring the location of businesses such as this are close to the source of the waste and build to a suitable capacity to meet the need.</li> </ul>

7	Cumulative effect	<ul style="list-style-type: none"> <li>The application does little to address the cumulative effect on the landscape, construction and loss of amenity on the growing residents as part of the Strategic Allocation of North Horsham which has since been approved.</li> </ul>
8	Loss of amenity for residents	<ul style="list-style-type: none"> <li>The local residents are concerned about: <ul style="list-style-type: none"> <li>Additional noise, odours, dust.</li> <li>The 3-year construction phase which could result in unacceptable hours, noise, odour, dust, particulates from contaminated sources being dispersed. This will be in conjunction with construction of the North Horsham Development and potential increase of business at Graylands and Broadlands if the Local Plan is amended following the current consultation.</li> <li>Conflict of land use between low-density residential use, open fields with animals grazing, ancient woodland and an increased industrial presence/ increase in waste processing at the Brockhurst Wood site.</li> <li>Operation times becoming 24/7 leading to permanent new noises, intense light on the stack and building, shift-related traffic from staff, and a pressure to extend the hours which the waste can be brought into and out of the site. This is already encroaching on weekends when residents wish to relax and make use of the outdoors.</li> <li>Greater exposure to contaminants during the construction phase.</li> <li>Air quality and carbon assessments being accurate</li> </ul> </li> <li>During operation, there will be gaseous and toxic emissions, pollutants, and vehicle emissions for long periods of time with resultant health implications.</li> <li>Reduction of rural landscape. The more industrialisation of the surrounding area will be perceived as a loss of the rural outlook many value and be perceived as a permanent loss. The visible plume will lead to concerns over health, reduce the desire to be out of doors and overall reduce the general enjoyment of the surrounding area.</li> <li>Farmers and those keeping horses in the surrounding fields may choose to seek other areas to graze their animals again leading to a reduction of landscape quality.</li> </ul>
9	Inadequate public consultation of Horsham District residents	<ul style="list-style-type: none"> <li>The applicant has failed to engage with the Horsham District populous who will be affected. Their assumption that only Langhurst Wood Road and Station Road residents would be affected is clearly flawed. Ni4H know there are concerned residents who live in a much larger catchment than those two roads and note the plume model shows a much wider set of affected people, as does the Theoretical Zone of Visibility. Many comments have been received by residents and businesses of</li> </ul>

		<p>Horsham District, that they would have been unaware of the proposal or planning application without the efforts of the Ni4H campaign. It is a concern that a large proportion of the town remains unaware of the proposal.</p>
10	There is limited benefit to the energy developed as part of the incineration	<ul style="list-style-type: none"> <li>• The site of the proposed incinerator does not lend itself to CHP, and only one local customer has been identified for the use of the electricity - Wienerberger. Wienerberger Horsham have advised us that they have not been consulted on this and are making use of electricity produced by the MBT. Literature has been misleading from Britaniacrest suggesting the output could heat/light residential houses, even though is not seen as a viable option in the documentation. There is no evidence to support the heat or electricity will be enabled to be harnessed.</li> <li>• Electricity and power can be generated from greener technologies than the Energy from Waste.</li> <li>• Any electricity and heat will need a “customer” with a constant demand as the incinerator will be operating 24-7.</li> </ul>
11	Parts of the Environmental Statement are incorrect, contain inconsistencies, based on out of date data and contain gaps.	<ul style="list-style-type: none"> <li>• The applicant’s documents do not evaluate the entirety of the impact of the development being pursued accurately and honestly. It is our view that many aspects have not be adequately mitigated or evidenced to support an approval in its current state.</li> <li>• There are concerns raised by UKWIN and Liberty on the Carbon Assessment, Air Quality Assessment and Landscape Assessment.</li> </ul>
12	Fire	<ul style="list-style-type: none"> <li>• The incinerator, and the use of flammable materials to operate it will increase the risk of fire to the location. There is insufficient information on what the impact could be to the local community if a fire were to break out, especially bearing in mind the businesses in operation on adjacent sites, such as the MBT and landfill, and areas of ancient woodland. This cumulative risk is not addressed.</li> </ul>



## Section 4: List of Evidence submitted

4.1 Plume Plotter- this has been produced by [PlumePlotter.com](http://PlumePlotter.com)<sup>v</sup> for Ni4H

Animations we present can be found at:

2015 for Britaniacrest Incinerator	<a href="https://youtu.be/O3DliEZs0Dk">https://youtu.be/O3DliEZs0Dk</a>
2016 for Britaniacrest Incinerator	<a href="https://youtu.be/t2JKmaNe484">https://youtu.be/t2JKmaNe484</a>
June 2015 for Britaniacrest Incinerator	<a href="https://youtu.be/nEuk0i9w_m0">https://youtu.be/nEuk0i9w_m0</a>
December 2015 for Britaniacrest incinerator	<a href="https://youtu.be/SPqC6zDvy0">https://youtu.be/SPqC6zDvy0</a>

### **Information about Plume Plotter**

Plume Plotter shows the Horsham pollution model in an animation, it's based on AERMOD, developed by the US EPA, which is one of the most famous modelling systems for air pollution. It uses the regulatory default options of AERMOD. It takes account of the real terrain in the vicinity of the incinerator, current weather conditions, upper air data, as well as properties of the incinerator emissions and the shape of the incinerator buildings. Data about the incinerator and its emissions is taken from the applicant's information sources.

Animations are created by modelling the incinerator plume every hour during a period of time, using historical weather data from a weather station local to the incinerator. Plume Plotter uses AERMOD ([1]) to calculate the concentration of pollution at each location, at ground level. AERMOD uses AERMET to pre-process meteorological data.

AERMOD is provided with the usual parameters of the emissions source: Stack location, Stack height, Stack diameter, Stack gas exit velocity, Stack gas temperature and Emission rate (of oxides of nitrogen).

Plume Plotter currently use a "pollutant ID" of "other", meaning that AERMOD will not perform any chemical simulations (e.g., converting NO to NO<sub>2</sub>). This allows the concentration of all other pollutants to be derived simply from the oxides of nitrogen concentrations by multiplying by the relative emission rates.

AERMOD also uses a few parameters of the area near the emissions source: Albedo. (If no value is specified in the AQA, 0.2 is used, as suggested by the AERMOD User's Guide.), Bowen ratio. (If no value is specified in the AQA, 1.0 is used, as suggested by the AERMOD User's Guide.) and Roughness length. (The value specified in the AQA is used.)

AERMOD is designed to be run over long periods, but the real-time Plume Plotter runs it for a single point in time. Weather observations required are also incorporated such as: Wind direction, Wind speed, Temperature, Pressure, Solar radiation and Cloud cover. These are obtained from the nearest reliable weather station on Weather Underground, with a secondary weather station used for solar radiation (because few record this). In the real-time plume plotter, Plume Plotter assume the cloud cover is 100%, because there is no real-time source of cloud cover data (except by asking the user, which rarely works), and cloud cover data is used by AERMOD only at night anyway. In historical runs of Plume Plotter, the actual cloud cover is obtained from historical datasets.

Plume Plotter makes use of terrain data (OS Terrain 50) from Ordnance Survey. This is converted to DEM format and pre-processed by AERMAP (offline) to be used by AERMOD. This allows AERMOD to model dispersion correctly for the terrain.

Plume Plotter also handles building downwash. The report ([2]) states:

"The presence of adjacent buildings can significantly affect the dispersion of the atmospheric emissions in various ways. Wind blowing around a building distorts the flow and creates zones of turbulence. The increased turbulence can cause greater plume mixing. Also, the rise and trajectory of the plume may be depressed slightly by the flow distortion. This downwash leads to higher ground level concentrations closer to the stack than those which would be present without the building."

The building(s) near the incinerator stack were measured from the plans in the respective planning applications and fed to the BPIP pre-processor (offline). BPIP generated information for AERMOD to correctly model building downwash.

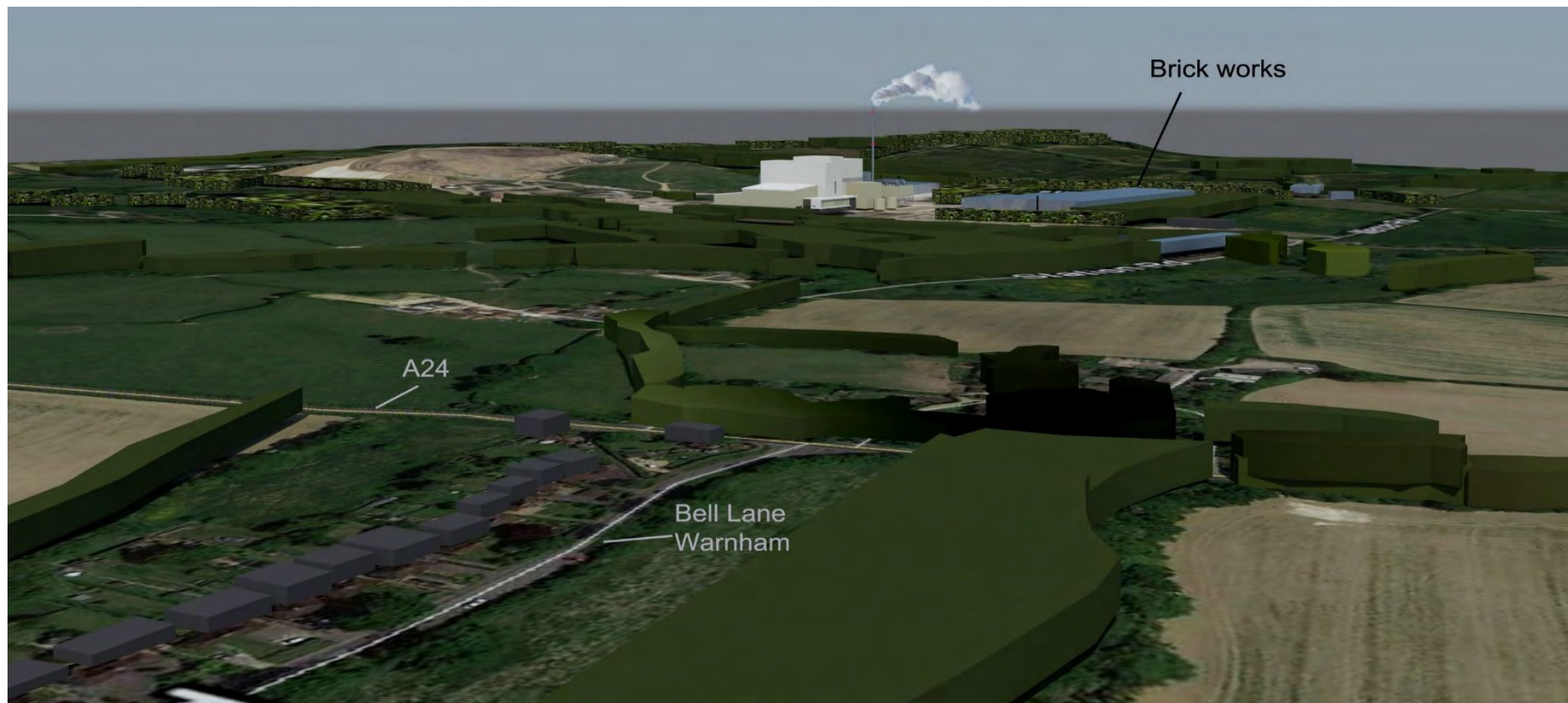
Stack tip downwash is also modelled. This doesn't require any effort from Plume Plotter; it is just a default option in AERMOD.

All weather data (except cloud cover) is provided by Weather Underground. The real-time Plume Plotter downloads the latest weather observations and runs AERMOD approximately every 15 minutes. For historical runs, hourly historical weather observations are used.

Maps are provided by Google (© Google).

**1.14 CAD drawings to show visual impact-**\* please note these are still based on the previous design and height of 90m stack and maximum height of building at 43m. The stack is now taller at 95m with the building reduced by 7m. The views are still useful despite that.

Helicopter View Warnham



**Information about the CAD drawing:**

The CAD drawings have been produced by an experienced CAD user who has both an architectural and design background.

The drawings have been developed using the applicant's information such as the architect's drawings and sizes of buildings. These have been overlaid onto topographical data using Ordnance Survey data sets and Google Earth.

### 4.3 Photomontages produced to show visual impact

A264 View





Knob Hill View



Mercer Road View





Station Road View





Warnham Green View



**Information about the photomontages:**

The photo montages have been produced by an experienced CAD and photoshop user who has both an architectural and design background.

The photo montages have been based on the same data as the CAD model. They are camera matched to the lens used and take into account the elevation of the building and the person taking the photograph. They provide a reasonable depiction of how the incinerator might actually look.

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<sup>ii</sup> <http://www.variablepitch.co.uk/stations/525/>

<sup>iii</sup> <http://www.variablepitch.co.uk/stations/150/>

<sup>iv</sup> [http://www.molevalley.gov.uk/media/pdf/o/c/Capel Incinerator Fact sheet.pdf](http://www.molevalley.gov.uk/media/pdf/o/c/Capel_Incinerator_Fact_sheet.pdf)

<sup>v</sup> <http://www.plumeplotter.com/animations/horsham/>

Sheepfields  
Forest Green  
Dorking  
Surrey  
RH5 5PR

1<sup>st</sup> May 2018

County Planning  
West Sussex County Council  
County Hall  
Chichester  
PO19 1RH

Dear Sirs,

**Application No. WSCC/015/18/NH Proposed Recycling, Recovery and Renewable Energy facility at Wealden Brickworks, RH12 4QD**

I write to object to the above application.

My reasons for objection are as follows:

1. The concept of burning waste is outmoded. Changes in the public attitude to waste, in part inspired by the recent Blue Planet programme, are taking place very rapidly and this is likely to lead to a considerable reduction in the amount of waste being produced.
2. Both the scale of the building and the height of the chimney are excessive. The site is prominent from the higher ground along the A24 to the north and the proposed complex will be highly visible from this area.
3. The proposed 24/7 operations will cause significant light pollution. This will affect a wide area and further urbanise the rural outskirts of Horsham.
4. The road access is poor, especially from the north via the A24, a road with a significant history of accidents.
5. There has recently been very significant domestic development to the west of Horsham, and also at Wickhurst Green. A further 2,500 houses are to follow shortly north of Horsham. This proposal, which poses air pollution risks, is too near these concentrations of new homes, which will potentially be adversely affected by pollution from both the plant itself, and from vehicles serving it.

We should be focusing on reduce, retain, reuse, and lastly recycle – not burn!

I therefore object to the Application and hope that the above is of assistance to you in determining it.

Yours faithfully,

Gareth Hayton

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**From:** Kevin Bacon  
**Sent:** 02 May 2018 09:18  
**To:** PL Planning Applications  
**Cc:** david.sheldon@westsussex.gov.uk; Nigel Dennis; Morwen Millson;  
elizabeth.kitchen@westsussex.gov.uk; Louise Goldsmith  
**Subject:** Planning Reference - WSCC/015/18/NH

Mr. K Bacon  
16 Station Road  
Warnham  
West Sussex  
RH12 3SR

2<sup>nd</sup> May 2018

County Planning,  
West Sussex County Council,  
County Hall,  
Chichester PO19 1RH

Attention: Planning

Planning ref:  
WSCC/015/18/NH  
Wealden Brickworks, Langhurstwood Road,  
Horsham, West Sussex, RH12 4QD

As a resident of Warnham parish I would like to strongly **OBJECT** to the proposed incinerator being built.

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:**

*To make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.*

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

The cost alone of the proposed incinerator will ensure that the owners take waste from far and wide to recoup the millions of pounds it will cost.

It is clear that this proposal goes against the WSCC waste policy to recycle close to the origin of the waste.

**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 enhance the natural environment.

**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*

The proposal will have a dramatic effect on the character of Warnham and Horsham and so I believe it does not meet the criteria.

#### **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:*
  - (i) the topography, landscape, townscape, streetscape and skyline of the surrounding area;*
  - (ii) Views into and out of the site.*

This incinerator clearly does not meet this requirement as the proposer states waste will be sourced from outside of WSCC to keep the commercial incinerator burning 24/7.

#### **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35m in height. The chimney stack will be 95m tall and cannot be hidden. The total impact of the buildings cannot be hidden by any landscaping efforts due to the height and scale of this carbuncle of an industrial building in the countryside.

The building will be bigger than Horsham's shopping centre, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

#### **Light Pollution**

For the CAA to demand middle and top of the stack is lit at night is due to flight paths and other aircraft such as the ever-increasing number of helicopters in the vicinity of Horsham. The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site or state that routing will have to be revised, as this would create a permanent obstacle for aviation movements.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

#### **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa biomechanical digester that taxpayers contributed towards in 2009 when WSCC took the decision not to incinerate waste would virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial / commercial. The EU is encouraging

these bio-mechanic plants over incineration in the EU waste circle of household waste embracing new technology to recycle to a greater percentage.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

## **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35 decibels. This ambient noise levels decrease at night and the operations at the site are proposed to continue at night and so increasing sleep deprivation for those close to the plant as well as noise travels to elevated rural areas that surround the site.

## **Flue Stack**

The proposer has submitted a chimney of 95m as they state it has to be this height to take pollution away from households.

Pollution has to come down to earth at some point!

There are also vital drinking water reservoirs in this direction and I question why no assessment of what the toxins from the chimney pollution, such as arsenic, metals will do to the land, peoples breathing and the water supply.

At the Britaniacrest exhibition the organisers stated that there are solutions that require zero emissions but have been excluded due to the high cost of such schemes.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014 that is yet to be built. With an incinerator already with planning permission on the coast it is highly questionable why an incinerator is needed on the edge of the county surrounded by housing.

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

As the emissions pour from the stack; I do not trust or believe that the 95m stack will dissipate the ash high, as it will be impacted by the 24/7 movements of aircraft and the vortex they create as they climb. It is believed that this will push the ash down to surrounding areas, which will be the new housing estate of North Horsham, with three schools, and Warnham parish and Crawley.

The site sits in a bucket location, lower ground, surrounded by hills, which could cause the emissions to remain locally. Already, certain meteorological conditions cause the gases from the land fill site to accumulate around this area.

## **Operations**



Britaniacrest have made it clear that they do not intend to run the site and so I am very concerned about the on-going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **Not linked to the national grid**

There are no plans to connect the plant to the national grid with this proposal or how this would be funded.

### **Compensation**

There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation for the air pollution that residents will be expected to endure which unknown health implications.

There is no compensation being offered to those whose homes will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

### **Closing statement**

If I were in a position to affect the development of such a proposal, I would ask myself, would I be proud to point out such a building to my children or grandchildren and say "I was partly responsible to get that built"?

Remember we will all and be judged by generations to come, what will your legacy be?

I re-iterate that I strongly oppose the Britaniacrest proposals for an incinerator at Wealden Brickworks.

Yours sincerely  
Mr. K. Bacon



Please consider the environment before printing this e-mail

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**From:** Victoria Burrows  
**Sent:** 01 May 2018 16:40  
**To:** PL Planning Applications  
**Cc:** Noel Atkins; Andrew Barrett-Miles; George Barton; Ian Buckland; Duncan Crow; Janet Duncton; Liz Kitchen; Nigel Jupp; Simon Oakley; Ashvin Patel; Brian Quinn; Jacquie Russell; Sujana Wickremaratne; Bill Acraman; David Barling; Joy Dennis; Paul High; Michael Jones; Sean McDonald; Morwen Millson; Christian Mitchell; Louise Goldsmith  
**Subject:** Proposed Incinerator - Objection

Dear Sir or Madam

Re: Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I write in response to the proposals for an incinerator in Horsham, West Sussex. The proposals do not meet WSCC waste plan:

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

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county. It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

b) 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 enhance the natural environment.

c) 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.....

Yet the proposal will have a dramatic effect on the character of Warnham and Horsham and so I do not believe it meets the criteria.

(d) 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 proposed incinerator clearly does not meet this requirement.

## Visual Impact

The proposed incinerator building will be taller than this chimney some 35.92m in height. The building will be bigger than Horsham's shopping centre, Swan Walk, and taller than the brickworks chimney, 26.5m. It will be

seen from far and wide, including areas of outstanding natural beauty. The proposers themselves acknowledge that it will be seen as far as Box Hill.

### **Light Pollution**

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 stack will therefore be lit up producing a significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **It is Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn. Another negative impact on the town.

Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **It will not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposed incinerator. I therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

### **Compensation**

There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation being offered to those whose home will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

### **UK Cross Party Political oppose incineration**

UK Win are behind the political cross party Early Day Motion (581)\* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK. Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

The European Commission (EC) calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing out support for mixed waste incineration. (29 January 2018)

'The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs. The

EfW process must be redefined to ensure that increases in recycling and reuse are not hampered, and that over-capacities for residual waste treatment are not created.

Long-term circular economy perspective. The EC's communication reads: 'In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy. 'Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators. For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.'

In the circumstances and for the reasons set out above I write to register my objection to the proposals for an incinerator at the above site.

I look forward to hearing from you.

Yours faithfully

Victoria Burrows

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**From:** Elizabeth Catchpole  
**Sent:** 01 May 2018 11:55  
**To:** PL Planning Applications  
**Subject:** Objection to PLANNING APPLICATION WSCC/015/18/NH

Dear Sir/Madam,

Ref: PLANNING APPLICATION WSCC/015/18/NH

I would like to object to the above application on the following grounds:

### **Contrary to planning policies**

This planning application is contrary to planning policies that apply to the amenity of existing and proposed residents and businesses in the North Horsham area including:

West Sussex Waste Local Plan Policies W16, W19, W21;

Horsham District Planning Framework Policy 24;

National Planning Policy Framework paragraphs 14 and 17.

They are lighting, noise, dust, odours and other emissions, including those arising from traffic, and routes and amenities in the vicinity of the site.

### **The proposals for an incinerator does not meet WSCC waste plan**

Strategic Objective 5: It is clear that this proposal goes against the WSCC waste plan to recycle as close to the origin of waste. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from well beyond the county border.

Strategic Objective 10: This proposal will not enhance the natural environment

Policy W11: Character. This proposal will have an unacceptable impact on the character, distinctiveness, and sense of place of villages such as Warnham and Rusper and Horsham.

Policy W12: Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) consider 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.

Nothing has changed since the last application when it was concluded that *this proposal introduces a size of development that does not currently exist when viewed from the Surrey Hills AONB and High Weald AONB, with significant adverse impacts on views from the Land North of Horsham Allocation, and Warnham Conservation Area, as well as other sites of heritage value such as a Scheduled Monument, and Registered Parks and Gardens in the locality. The development is out of keeping with its surroundings and would represent a significant increase over existing buildings either on site or in the surrounding area.*

### **Cumulative impact of a landfill**

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 Development has been approved, WSCC would, if it approves such a

development, expose a greater number of people to the health and social impacts of this intensive waste site.

### **Noise and vibration**

In the previous planning application, noise impact was one of the reasons for refusal. In that planning application, the County Council considered that Britaniacrest had failed to demonstrate that the noise from the operation of the proposed facility (both singularly and cumulatively with other developments) would not have a significant adverse impact on current residents and the future residents. Nothing has changed and therefore this original significant reason for refusal should continue to apply for this application.

The incinerator would increase noise for residents during the evening and weekends when residents should expect to enjoy the peaceful rural surroundings in which they have chosen to live.

### **Not an appropriate site**

The proposed chimney stack would be 95 metres in height in order to disperse the pollutants. New housing as well as school, community facilities and significant areas of public open space will be located within 800 metres of the stack, and also be subject to the significant adverse environmental effect of the 'plume' from the stack.

Also WSCC have already given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast together with an incinerator at Gatwick it is questionable why an incinerator is needed in this part of the county.

### **Construction Noise and traffic**

The 3-year construction period would make the noise, traffic, parking problems, dirt, dust for 5 days of the week for a prolonged period of time overwhelming and highly intrusive for residents. Add this to any impact from the North Horsham development, and it would lead to a huge reduction of privacy and quality of life.

### **Air Quality**

Air quality is declining in the area due to the increase in congestion surrounding North Horsham. This proposal would imported more industrial and commercial waste into Horsham to feed the incinerator, bringing more diesel lorries on to the already dangerous A24, congested A264, A29, M23.

Road transport is responsible for some 80% of nitrogen dioxide concentration at the roadside with diesel vehicles of greatest concern. There is therefore a potential for a build up of pollution from vehicles, the current waste site and the potential emissions from the new facility.

### **Nothing material has changed**

Nothing important has changed since the last application which also concluded that the nature of the development proposed in this application is not considered to be acceptable in terms of its visual impact or impact on the landscape, and the applicant has failed to demonstrate that the noise impact would be acceptable. The development does not accord with the development plan or other material considerations.

I would like to add my objection to the above Planning Application.

Yours faithfully,

Elizabeth Catchpole

Northlands House, Northlands Road, Horsham RH12 5PW

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**From:** NORMAN CLARKE  
**Sent:** 01 May 2018 19:22  
**To:** PL Planning Applications  
**Subject:** Planning Application WSCC/015/18/NH - Objection

To whom it may concern,

**WSCC/015/18/NH – Britaniacrest (BCR)**

As a resident of Station Road, Warnham I wish to submit the following objections to the proposed 3R facility at The Former Wealden Works, Langhurstwood Road, Horsham:

The site is not suitable for the proposed development, being too small and too close to the adjacent railway line to bury the building. Similar facilities throughout the UK are partially buried to mitigate the visual impact but this cannot be achieved at this site. I recognise that the developer has attempted to mitigate this with a small reduction in building height and re-affirm my belief that the reduction is not sufficient. The building is still too high.

The building design and size will have an adverse effect on the visual impact from Station Road (as demonstrated by the new photomontages provided in the 2018 application) and is entirely out of character with the rural surroundings of my home, being a huge industrial building of poor visual design. I recognise that the developer has altered the design since their previous application, based upon what they claim was sufficient public consultation.

However, the public consultation was insufficient in that the developer presented two designs and asked the small number of attendees to choose between the two. This is further compounded because the public exhibition was held at short notice and a second consultation (reasonably requested by members of the Resident's Liaison Committee) was rejected by Britaniacrest.

The current view is of a chimney no greater than 28m high (depending on source of the information). The proposed building is 35.9 high with a 90-95m chimney. The poor building design and size of the proposed development will adversely affect the visual impact from a wide area being clearly visible from various points on Station Road, all major arterial roads in the area (Views of the current chimney are visible from A24 from the North, West and South and A264 from East and South).

The proposed development is also adjacent to the Victoria to Horsham railway line, being a major entry route for travellers to the rural market town of Horsham and the historic village of Warnham and the industrial nature of the design will adversely affect the image of the area as visitors arrive by train.

The source of waste is (at this stage) reportedly mainly commercial and industrial from various counties, which represents a significant extension to the West Sussex Waste Plan which outlines how waste from West Sussex will be handled and is therefore outside the scope of the plan.

Although the site lies immediately adjacent to the railway line this sustainable method of transport has been dismissed by the developer as a delivery method. Strategic Objective 7 refers: "to maximise the use of rail and water transport for the movement of waste to minimise lorry movements and the use of local roads for the movement of waste. Policy W18 states *"Proposals for waste development will be permitted provided that: (a) where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site"*

The Waste Plan outlines that WSCC aim to protect and where possible, enhance the health and amenity of residents, businesses and visitors. There is no guarantee of this given that:

- Diesel emissions will increase in the area as the operation increases transport of waste
- Waste will be imported by HGV from sources at a time that the UK is attempting to reduce the use of diesel vehicles to prevent impacts on health due to carbon dioxide and NOx emissions
- Hazardous by product will need to be transported from the site by road to an as yet undisclosed address, which could be in Cheshire
- Emissions (pollutant, heavy metals and carcinogenic dioxins) will be produced into the atmosphere. Even though they would be at the currently accepted and legal levels, there is no guarantee that harm is not caused by minute particulate matter to the health of local people, wildlife or domestic/agricultural animals within the locality. Based on current scientific evidence asthma is caused by pollution, no matter how low the level. Asthma still kills 3 people on average per day in the UK and the NHS spends around 1 billion a year treating and caring for people with asthma (<https://www.asthma.org.uk/about/media/facts-and-statistics/> accessed 24/04/2018).



In the case of plant failure (such as those experienced during the first week of operation at the Dublin 3R facility in 2017) harmful emission levels could potentially increase immediately with extremely harmful short and long-term repercussions. There can be no 100% guarantee of safety with regard to public health in relation to any form of incineration process.

Whilst I argue that the proposal is entirely out of keeping with a rural area, it is even less compatible with the plans for the adjacent residential North Horsham development and accompanying schools.

The BCR proposal will cause significant loss of amenity for existing residents in terms of noise pollution, contributing an increase on existing noise levels causing a cumulative effect of noise pollution. This most definitely will impact my home, which was the receptor point for the developer's noise tests, and the homes of my neighbours. Indeed the developer's own architect admitted at a Resident's Liaison Committee Meeting that the noise and light levels will be noticeable at night.

This proposal will cause significant loss of amenity for existing residents in terms of light pollution. The developer has proposed a 24 operation which will require that the site be lit causing a significant increase in light levels experienced at homes on Station Road, which is a predominantly dark country lane. This has a cumulative effect taking into consideration existing lighting from Warnham Station and the Wienerberger Brickworks to the east and north east of properties. Currently the existing street lighting (a single lamp) is extinguished at midnight (BST) which protects and reflects the rural nature of the lane and prevents night-time light pollution.

The developer has suggested that this process will provide electricity. The incinerator is highly unlikely to fulfil its potential in terms of energy recovery. Figures supplied by OFGEM show that actual supply of electricity from similar technology in use in the UK falls far below the theoretical capacity in that **zero** CHP Energy from Waste stations and **zero** waste using advanced conversion technology actually provide energy in the UK at present. (<https://www.variablepitch.co.uk/categories/> accessed 24/04/2018)

The developer claims that views of the facility will have little impact to the residents of Station Road. There are direct views from the entrance to Andrews Farm Barns, Station Road and from some homes at Station Cottages. The current chimney is approximately 26.5mtr - 28 mtrs (depending on source) high and is roughly level with the skyline from various viewpoints. The proposed building is considerably higher than the existing chimney, above the tree canopy, with a proposed chimney height of 90-95mtr. It will create a completely new skyline and have considerable visual impact not only for local residents, but other users of Station Road (including the commuters who use Warnham Station) and indeed users of the A24 and A264.

I further object because the building size and design is entirely out of keeping with the character of Warnham and Horsham.

I object because the building size is entirely out of keeping with the character of Rural West Sussex.

I object because the site is too small to put in place mitigating factors that would reduce the impact such a huge industrial building will have in this landscape.

I further believe that this facility will add to the cumulative effect of traffic on the local road system which is already at full capacity during rush hour. Current transport moves to and from the site are much lower than permission allows but still the A24 and A264 struggle to cope. Road infrastructure and safety is a pressing issue that has not been sufficiently addressed by the developer's proposals.

In closing I will also add that over the last 12 months many factors have changed, not least in the Blue Planet Effect, which has seen a sudden and remarkable change to our environmental consciousness. Within a very short time we have seen a significant reduction in the use of plastics. Emerging technologies are now using plastics to enhance and promote the circular waste economy, which incineration does not. The European Commission has warned that incineration hampers the move towards a circular waste economy (*The Role of Waste-to-Energy in the Circular Economy*, 26.01.2017). They recommend investment in more recycling capacity and anaerobic digestion instead. Here in Horsham, we already have a Mechanical & Biological Treatment plant, on the site adjacent to the proposed incinerator, which was part-funded by the taxpayer. We have already invested in the recommended technology and if further such facilities are recommended then let us consider those, in areas close to the waste generated (thus minimising transport associated pollution). Let us dismiss the consideration of outdated technology which injures our attempts to live in an environmentally sustainable way and will undoubtedly prove to be a white elephant of epic proportions in our county.

Yours faithfully  
Norman Clarke  
11 Station Road, Warnham RH12 3SR

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**From:** Helen Clarke  
**Sent:** 01 May 2018 19:00  
**To:** PL Planning Applications  
**Subject:** Application WSCC/015/18/NH

To whom it may concern

**Application WSCC/015/18/NH proposed by Britaniacrest Recycling Ltd (BCR)**

I object to the proposed development of a 3R/incinerator facility on the following grounds:

**Item 1 – Lighting**

BCR contend that trees will obscure the view and reduce the detrimental impact of lighting, although the roofline and chimney stack are above the natural tree canopy. Station Road residents and visitors to the Horsham area will see the building, chimney and the lighting. This change will cause a major adverse effect to residential amenity in terms of visual impact and light pollution.

**Item 2 – The environment**

Incinerators are not sources of "renewable" energy. Incinerators use energy to generate very high temperatures to burn waste, thus converting the waste into hazardous ash, gas and heat. The effectiveness of an incinerator to become a net producer of energy depends entirely upon the type of waste and its calorific value. Incineration plants for industrial waste have routinely proved to be inefficient and can only be made commercially viable by burning recyclable (residential) waste - thus detrimentally reducing recycling.

The European Commission has warned that incineration hampers the move towards a circular waste economy (The Role of Waste-to-Energy in the Circular Economy, 26.01.2017). They recommend investment in more recycling capacity and anaerobic digestion instead. Here in Horsham, we already have a Mechanical & Biological Treatment plant, on the site adjacent to the proposed incinerator, which was part-funded by the taxpayer. As such, we have already invested in the recommended technology here in West Sussex.

DEFRA chief scientific advisor, Ian Boyd, has expressed his personal opinion that incineration extinguishes innovation and is worse than landfill because it destroys value.

Furthermore, developments in technology now present us with alternatives to incineration. As an example, MacRebur are now using recovered plastics as road surfacing, in place of tarmac. This will give us stronger roads, locks in microbeads preventing plastics pollution and is using plastic waste as a genuine resource. Once something is burnt it is gone forever, leaving only polluting particulate matter and toxic waste ash behind.

The only logical conclusion to be drawn is that when waste is incinerated it is no longer part of the circular waste economy that western countries are striving to achieve and it is therefore an outmoded technology and is counter to the drive for cleaner, environmentally sustainable methods of waste handling.

**Item 3 – Visual Impact**

Should the development go ahead, the visual impact will affect the residential amenity of Station Road residents and this is evidenced in Viewpoint 44 Figure 5.22. The huge industrial building will be clearly visible at all times of the year above the tree canopy. This will include a plume emitting from the 90-95m chimney. As I contended in 2017, the visual effect from Station Road represents a major impact to residents.

I note that photomontage Viewpoint 15, figure 5.23 is from commercial premises now owned by Foss Holdings (The Foss family own and operate Britaniacrest) and assume that they have no issues with their view, which is mainly obscured by trees immediately on the boundary of the property and so does not offer the long-range views that other positions in the road afford. As this land is not

accessible to residents of Station Road or members of the public I would argue that is not a suitable location for a photomontage to be shown.

#### **Item 4 - Character**

The proposed building is entirely out of character with the surroundings in terms of the industrial nature of the building. Its size and scale are out of character for this area which is rural in nature with no other visible industrial buildings in the vicinity (all others are below the tree canopy and obscured from view). The proposed huge industrial building, chimney and plume will adversely affect the rural character of the market town of Horsham and the historic Parish of Warnham in contravention of the Waste Local Plan items W12 and Strategic Objective 8.

#### **Item 5 - Location**

This industrial development is an entirely inappropriate area close to homes and existing schools and immediately adjacent to the planned North Horsham residential development and schools.

#### **Item 6 – Road safety**

Hazardous lime residue would need to be removed from the facility and transported by road to an as yet undisclosed location elsewhere in the UK, which could be as far afield as a storage facility in Cheshire. Transportation of hazardous material by road a) carries potential risk and is b) environmentally unsound when the resultant HGV emissions are also considered.

Given that one of the main road routes to and from the site is the already dangerous A24, which passes through various rural villages and, to the North, the historic market town of Dorking, this method of transporting waste and then hazardous by-product seems detrimental to the health and safety of other road users and fails to seriously consider alternative methods, namely the rail line immediately adjacent to the site. Whilst I appreciate this would be expensive for the operator it must surely be safer and a greener alternative.

#### **Item 7 – Cross County Movements**

The facility is not necessarily near the main sources of waste. Waste will cross county borders from Surrey, East Sussex and possibly Hampshire. This contravenes the Waste Plan which states *"in keeping with the principle of net self-sufficiency, no provision is made to meet the needs of adjoining authorities elsewhere in the region or the UK".* and *"...it is not considered appropriate to make the provision for the continued disposal of waste from outside West Sussex"* and *"limited cross border waste movements would need to be justified on their merits".*

As this is an entirely commercial venture for the benefit of the developers profits there can be no such merit for West Sussex or its residents in importing waste into the county. Indeed, because it is a for profit proposal to handle industrial and commercial waste there is no guarantee the developer will opt to prioritise waste from West Sussex if a more profitable income stream is offered from Surrey, for example. This proposed development therefore contravenes the West Sussex Waste Plan.

#### **Item 8 - Noise**

In terms of noise pollution, related to loss of amenity, there will be an increase in background noise in a quiet rural setting, especially at night. This will impact my home and those of my neighbours. As an aside, I experienced comments made by the proposers' representative at a meeting (attended by one of your officers) earlier in the year as shocking. He stated that noise was only a problem because it was a quiet rural area. That is precisely why people choose to live here and, in my opinion, this comment serves to demonstrate the lack of regard the developer has for rural West Sussex.

#### **Item 9 – Health**

The developer also offers that the health of the area is excellent and above the national average. They state:

*"Emergency hospital admissions for a range of cardiovascular and respiratory diseases is also considered to be lower than the national average based on standardised admission ratios for Coronary Heart Disease (CHD) and Chronic Obstructive Pulmonary Disease (COPD) which have been applied to cardiovascular and respiratory diseases respectively."*

They go on to imply that the excellent health enjoyed by local residents means that, statistically, we won't be as adversely impacted in terms of health as other areas might by adverse impact from this facility. Surely, we don't want to get any closer to the national average, so any adverse impact is too much?

In addition, various studies have shown a correlation between increased industrialization/urbanization and decreased mental and physical health across populations. Whilst I do not argue that one building makes the difference, evidence shows that the cumulative effect of urban development does impact health. Stressors such as low level but constant industrial noise, air pollution, traffic and night-time artificial light all play their part in this (all factors at play with this proposed development). You need only remember the last time you were in a place without the hum of background noise, under a clear night sky, to know how healthy it is to be in a peaceful, rural environment. We now know that poor mental health has a direct link to a rise in auto-immune disease and cannot hide behind ignorance of these factors. We need to protect rural England, not merely because it is pretty, but because our health depends on it.

Yours faithfully

Helen Clarke  
11 Station Road, Warnham RH12 3SR

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**From:** Claire Marchant  
**Sent:** 02 May 2018 10:42  
**To:** PL Planning Applications  
**Subject:** Planning Application WSCC/015/18NH - OBJECTION

**To Strategic Planning, West Sussex County Council, County Hall, Chichester, West Sussex PO19 1RH**

I would like to register my total objection to the Planning Application WSCC/015/18 for a Recycling, Recovery and Renewable Energy Facility by Britaniacrest. I think allowing a company to build and operate this facility would be detrimental to the local inhabitants, the environment and to the surrounding area as a whole for the following reasons:

**Public Health:** The necessity of building a 95m tall chimney makes it obvious the emissions aren't going to be harmless and will in fact spread out over a wide area. There doesn't appear to be any information as to what all the emissions will be or where harmful particles will go. The CO2 emissions alone should be considered unacceptable and as the results of other emissions aren't known, the potential risk is too great.

**WSCC Waste Local Plan:** It would not fulfil the **Strategic Objective 5** of the Waste Local Plan as the scale of the incinerator would mean waste would also need to be transported in, as local waste won't be enough to keep it working. This in turn would add significantly more heavy traffic to the area.

**Strategic Objective 11** of the Waste Local Plan would not be complied with as this application would not protect or enhance the natural environment in anyway whatsoever. It isn't environmentally friendly to be emitting such vast amounts of CO2 plus other unknown substances.

**Visibility:** The emission plume could be up to 400m high and the building will be seen over a wide area. The scale is totally out of proportion given its location so close to housing developments

**Noise and Light Pollution:** As it would be working 24/7 the noise, increased traffic and light pollution should not be inflicted on local residents.

**Recycling:** I don't believe incineration of waste is a long term solution to the problem of waste. There is quickly growing public and corporate commitments to reducing the production of plastic waste and increasing the recyclability of what is produced. I therefore think this incinerator will have a detrimental effect on recycling as it will need vast amounts of waste to operate 24/7. There is growing pressure for the Government to push for a moratorium on incinerator facilities as there is already over capacity in this country - in light of this no new applications should be considered.

I sincerely hope that this application will be refused.

Yours sincerely

C Marchant,  
Horsham

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**From:** Emma Masters  
**Sent:** 01 May 2018 16:57  
**To:** PL Planning Applications; Andrew Barrett-Miles; George Barton; Ian Buckland; Duncan Crow; Janet Duncton; Liz Kitchen; Nigel Jupp; Simon Oakley; Ashvin Patel; Brian Quinn; Jacquie Russell; Sujan Wickremaratchi; Bill Acraman; David Barling; Joy Dennis; Paul High; Michael Jones; Sean McDonald; Morwen Millson; Christian Mitchell; Louise Goldsmith  
**Subject:** Incinerator planning application

Dear Sir or Madam

Re: Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I write in response to the proposals for an incinerator in Horsham, West Sussex. The proposals do not meet WSCC waste plan:

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

The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county. It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

b) 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 enhance the natural environment.

c) 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.....

Yet the proposal will have a dramatic effect on the character of Warnham and Horsham and so I do not believe it meets the criteria.

(d) 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 proposed incinerator clearly does not meet this requirement.

### Visual Impact

The proposed incinerator building will be taller than this chimney some 35.92m in height. The building will be bigger than Horsham's shopping centre, Swan Walk, and taller than the brickworks chimney, 26.5m. It will be

seen from far and wide, including areas of outstanding natural beauty. The proposers themselves acknowledge that it will be seen as far as Box Hill.

### **Light Pollution**

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 stack will therefore be lit up producing a significant increase in light pollution from the plant and the skyline.

### **Recycle**

WSSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### **It is Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn. Another negative impact on the town.

Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

### **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

### **It will not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposed incinerator. I therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

### **Compensation**



There is no offer of compensation for noise and light pollution to the surrounding communities. There is no compensation being offered to those whose home will be devalued by the building of an industrial incinerator of this magnitude adjacent to their homes.

### **UK Cross Party Political oppose incineration**

UK Win are behind the political cross party Early Day Motion (581)\* to place a moratorium on new incinerators because there is not enough waste to feed the incinerators currently in use and being built in the UK. Research increasingly shows that incineration decreases the rate of recycling and with the amount of plastic in production set to decrease dramatically in the next few years, what will this Horsham incinerator burn?

The European Commission (EC) calls for member states to consider more carefully the waste hierarchy when looking at increasing incineration and suggest phasing out support for mixed waste incineration. (29 January 2018)

'The guidance states that the World Bank estimates that over the next 10 years €6 trillion (£5 trillion) will be invested in clean technologies in developing countries, with some €1.6 trillion (£1.3 trillion) accessible to SMEs. The

EfW process must be redefined to ensure that increases in recycling and reuse are not hampered, and that over-capacities for residual waste treatment are not created.

Long-term circular economy perspective. The EC's communication reads: 'In order to promote innovation and avoid potential economic losses due to stranded assets, investment in new waste treatment capacity needs to be framed in a long-term circular economy perspective and to be consistent with the EU waste hierarchy. 'Public funding should also avoid creating overcapacity for non-recyclable waste treatment such as incinerators. For these reasons, member states are advised to gradually phase-out public support for the recovery of energy from mixed waste.'

In the circumstances and for the reasons set out above I write to register my objection to the proposals for an incinerator at the above site.

I look forward to hearing from you.

Yours faithfully

Emma Masters

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**From:** Nicky Newton  
**Sent:** 02 May 2018 08:32  
**To:** PL Planning Applications  
**Cc:** david.sheldon@westsussex.gov.uk; Nigel Dennis; Morwen Millson; elizabeth.kitchen@westsussex.gov.uk; Louise Goldsmith; Noel Atkins; Andrew Barrett-Miles; George Barton; Ian Buckland; Duncan Crow; Janet Duncton; Liz Kitchen; Nigel Jupp; Simon Oakley; Ashvin Patel; Brian Quinn; Jacquie Russell; Sujan Wickremaratchi; Bill Acraman; David Barling; Joy Dennis; Paul High; Michael Jones; Sean McDonald; Christian Mitchell; ray.dawe@horsham.gov.uk  
**Subject:** WSCC/015/18/NH Objection to Horsham Incinerator

I am writing to object to the incinerator planned for Horsham.

I am deeply concerned that the scale of INDUSTRIAL and COMMERCIAL waste that will travel from across the UK (and maybe further afield). This will have a HUGE NEGATIVE impact on road traffic and associated pollution, as well as our roads degenerating with the scale of trucks carrying this waste to the incinerator. There will also be 24 hour LIGHT POLLUTION coming from the lights on the incinerator that need to be on 24 hours a day to warn aircraft as the chimney of this building will be 95m high (higher than the statue of liberty! and visible for miles and miles) - and the exhaust plumes will be even higher than this. This is definitely not in keeping with Horsham's rural charm. My understanding is that incinerators are usually built in coastal areas not bang in the middle of one of England's most beautiful areas of countryside.

I also raise concerns about the POLLUTION that will be emitted into the air and consequently onto land, which will impact us, our children (especially given the extremely close proximity of a NURSERY pre-school and SCHOOL). Additionally, the incinerator is proposed to be built only 5km away from an area of Outstanding Natural Beauty. I am shocked that this application is even being considered - surely the preservation of such an area and ecosystem that has been flourishing for thousands of years is important? Surely our health and our children's health is vital?

I have concerns for the housing developer Liberty who will be developing circa 2,500 houses in close vicinity to the proposed site. I can't imagine who would want to buy a new house next door to a commercial and industrial incinerator. This in turn means that the council could lose out on potential council tax if these houses are not sold. It could also affect future housing developments in the Horsham area and therefore, the councils will lose money from loss of council tax, but also from the payment via developers. Horsham could well struggle to attract people into the area. Horsham is currently a beautiful rural town, attracting day visitors at the weekends. This could change! We already have had a number of businesses close recently in the town centre - the presence of a huge incinerator visible for miles around could thwart visitors and damage the local economy. Additionally, the impact of local farmers on potentially contaminated land or the perception of contaminated land could be disastrous. I would hope that we hold onto Horsham's charm and not turn it into something akin to a vision of the 1950's industrial revolution.

Horsham already has an MBT facility and i feel that we have done our part here for waste processing. I wonder also whether the UK is focusing on the reduction of plastics - coffee shops and large supermarket chains are already stipulating that they will not provide plastic disposable cups for coffee etc. There may well be a government levy on disposable plastic cups. Single plastic bags are under scrutiny... People want to cut down on waste and i think that any application for incinerators should be put on hold for now - especially when the contract length is so long - 30-40 years. It's probable that over the coming years the amount of waste will reduce significantly. Therefore, where will the waste come from that will fuel these incinerators for the next 30-40 years? Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK.

Finally, I would like to draw your attention to the final comments submitted in Brittaniacrest's community profile document, that "...overall, it can be concluded that the local communities within the study area are not significantly more susceptible to any **potential change to the environment**." I would especially like to draw attention to the words 'potential change to the environment'. By their own admission, Brittaniacrest have stated that there may be a potential change to the environment if this commercial and industrial incinerator is built. There are numerous studies linking air pollution to cancer, particularly Hodgkin's disease, non Hodgkin's lymphoma and soft tissue sarcomas. I note that in Brittaniacrest's community profile, they have omitted the cancer statistics that although are better than the national average right now, would be a very useful indicator to compare in the years to come.

I ask you please to consider the views of local residents (almost 3,300 have signed a petition against this proposal) and to protect the health (both physical and mental) of the local residents.

With kind regards,  
Nicky Newton

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**From:** Jon  
**Sent:** 01 May 2018 20:03  
**To:** PL Planning Applications  
**Subject:** Planning application.

*30th April 2018*

*County Planning*

*West Sussex County Council*

*County Hall*

*Chichester PO19 1RH*

*Attention: Planning department*

*Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD*

*As residents of Horsham area I have to drive threads every day for work and they are already congested adding time and money to my daily travel. I therefore strongly object to the proposed incinerator being built.*

***Visual Impact** - The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height. The brickwork chimney already pumps out black smoke and is an eyesore on the rural landscape.*

### ***Light Pollution***

*The CAA would not be demanding such comprehensive lighting if the routes did not go over the proposed site. The site would become a permanent hazard for all aircraft and we are already seeing increases in helicopters due to the roads.*

### ***Recycle***

*The local authorities have spent so much on getting us to recycle this would a very short sighted way to go and it would be down to future generation to clear up the health issues of an incinerator.*

*WSCC would be wasting taxpayers money by building and incinerator as the Biffa bio-mechanical digester would become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.*

### ***Noise Pollution***

*Operations [24/7](#) it will create noise above the ambient noise enjoyed by rural areas*

### ***Flue Stack***

*At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.*

### **Not Needed**

*West Sussex already has given planning permission for an incinerator at Ford in 2014.*

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

*The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps.*

*This proposal would bring just under 300 lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.*

*The proposals for an incinerator does not meet WSCC waste plan:*

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.*

**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 enhance the natural environment.*

**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.....*

*The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.*

**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.*

*This incinerator clearly does not meet this requirement.*

### **Not linked to the national grid**

*Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.*

Jonathan Pavey  
Warnham Lodge Farm

Mayes Lane  
Warnham  
RH12 3SG

From Jonathan

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**From:** Greg Terry  
**Sent:** 02 May 2018 10:36  
**To:** PL Planning Applications  
**Cc:** Nigel Dennis; Morwen Millson; Louise Goldsmith  
**Subject:** Objection - North Horsham Incinerator

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**From:** Greg Terry  
**Sent:** 02 May 2018 09:08  
**To:** [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [nigel.dennis@westsussex.gov.uk](mailto:nigel.dennis@westsussex.gov.uk); [morwen.millson@westsussex.gov.uk](mailto:morwen.millson@westsussex.gov.uk); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [louise.goldsmith@westsussex.gov.uk](mailto:louise.goldsmith@westsussex.gov.uk)  
**Subject:** Objection - North Horsham Incinerator

Dear Sir

Reference WSCC/015/18/NH

I am writing to object to the proposed building of an incinerator off the A264 near the Brickworks.

The large size of the proposed incinerator is surely not appropriate to the local area. Large volumes of waste will need to be shipped in from other areas causing traffic issues in an area which is already set to increase dwellings and therefore road congestion.

The size of the development including the height will have a visual impact to the community.

Emissions will increase pollution in an area where I and my family live. Also there will be noise and light pollution which previously did not exist.

The Environment Agency states that incineration is not the 'way to go'. We could end up not having enough to incinerate. There are better waste solutions which should be investigated.

This proposal is most definitely not in the interest of myself and my family.

**PLEASE STOP THIS PROPOSAL NOW**

Greg Terry  
14 Petworth Drive  
RH12 5JH

**From:** Ni4h

**Sent:** 17 April 2018 16:48

**To:** Louise Goldsmith; Henry Smith; [mike.george@horleysurrey-tc.gov.uk](mailto:mike.george@horleysurrey-tc.gov.uk); [peter.lamb@crawley.gov.uk](mailto:peter.lamb@crawley.gov.uk); Bob Lanzer (Crawley Borough Council)

**Subject:** Toxic Cloud for Crawley and Horley

**Campaigners demand answers over Toxic Cloud threatening Sussex Beauty Spots.**

**CPRE Sussex is demanding a full investigation into the cocktail of chemicals which may soon be discharged into the air just outside the Sussex High Weald AONB (Area of Outstanding Natural Beauty).**

The haulage company, Britaniacrest wants to build an incinerator to burn toxic materials at Wealden Brickworks near *Horsham*. The process will emit greenhouse gases, acidic gases, heavy metals and poisons into the atmosphere just west of the Sussex High Weald AONB. The site is also upwind of one of the County's most densely populated areas (*Crawley and Horley*), and of a number of important drinking water reservoirs (*Ardingly, Wierwood and Bewl Water*).

CPRE Sussex's Dr Roger Smith is warning that the list of substances involved reads like "an environmental horror story." They include heavy metals such as arsenic and mercury which are cumulative and could cause irreversible damage to the environment and human health when they come to ground.

"The cumulative impact of dioxins and of any other persistent pollutants emitted by the facility, after coming to earth, seems not to have been assessed," he says.

"Mapping, showing where pollutants emitted by the proposed facility would come to earth and the extent of resulting ground fall/downwind-hazard areas ought to have been provided for public scrutiny, as part of the consultation. *However, the data submitted with this application was obtained at Charlwood, eight miles to the north, and not from the site of the proposed facility.*"

CPRE Sussex is now demanding a full investigation into how and where the pollutants emitted by the facility, individually, collectively, and cumulatively over time, could or would impact on farmland and livestock and the natural environment, including habitats, biodiversity and ecology.

"We take the air we breathe and the water we drink for granted," adds Dr Smith, "but this proposal puts both at risk."

Britaniacrest's plans also include a vast 95m chimney which, say campaigners would have a far reaching visual impact, blighting the countryside for miles around.

"By the company's own admission the incinerator will be seen for miles around," says CPRE Sussex Director, Kia Trainor. "This would blight the natural beauty of vast areas of rural landscape within Sussex and Surrey."

"CPRE Sussex believes that to permit such a monstrous industrial incinerator in the heart of Sussex countryside would inflict far reaching environmental damage and should be refused on every level."

The campaign against Britaniacrest's proposal is now gathering pace with a well attended public march in Horsham on Saturday (April, 14).

**CPRE Sussex is now urging people to formally object before the deadline for comments next week (April 28). Objections can be made via the West Sussex County Council website using the planning reference: WSCC/015/18/NH**

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WSCC Deadline to object 28th April 2018 to an industrial incinerator being built in Horsham

Twitter [ni4h.org](https://twitter.com/ni4h.org)

Facebook [noincinerator4horsham](https://www.facebook.com/noincinerator4horsham)

[www.ni4h.org](http://www.ni4h.org)



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**From:** Helen [REDACTED]  
**Sent:** 02 May 2018 17:21  
**To:** PL Planning Applications  
**Subject:** Planning Ref WSCC/015/18/NH

Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I live in Greenfinch Way, North Horsham and am writing to object to the above planning application.

The proposals for an incinerator does not meet WSCC waste plan for the following reasons:

Strategic Objective 5: to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises. The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

It is clear that this proposal goes against the WSCC waste policy to recycle close to origin of waste.

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 enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of Warnham and Horsham and so we believe it does not meet the criteria.

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.

This incinerator clearly does not meet this requirement.

#### Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

### Noise Pollution

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

### Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### Air Quality

The air quality is declining in the area due to the congestion surrounding our parish. Lack of

investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely  
Helen Henderson



3 Greenfinch Way

Horsham  
RH125HB

Sent from my iPhone

Tel: [REDACTED]

Horsham Society,  
82 Worthing Road,  
Horsham,  
West Sussex,  
RH12 1TD.

30th April 2018.

West Sussex County Council,  
Strategic Planning,  
County Hall,  
Chichester,  
West Sussex,  
PO19 1RH.

For the attention of Mr Sam Dumbrell.

Dear Sir,

Re: Application Number: WSCC/015/18/NH - Incinerator at Langhurstwood Road, Horsham.

On behalf of Horsham Society I write in respect of Application Number WSCC/015/18/NH, to which we wish to lodge an objection. Whilst it is acknowledged that the amended application reduces the overall height of the proposed building structure by commencing works below ground level, the chimney height remain at 95 metres in height and fitted with aviation warning lights. Therefore the massing of the building still remains unacceptable.

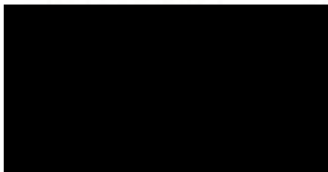
We acknowledge that emissions from such a plant will be strictly controlled by EU legislation. Furthermore we are pleased to note that the plant, if constructed, would be used to generate some 21 megawatts of electricity, of which 18 megawatts could be available for export to the local distribution network.

However, we do have considerable concerns regarding the movement of vehicles required to serve the plant, which will have a capacity to process some 230,000 tonnes of waste per annum. The waste would be delivered by road, involving some 101 vehicular movements per day. In addition a further 142 vehicular movements per day would be required to export from site recycled materials and those which could not be recycled. This would be a total of 243 vehicle movements per day, which is fewer than the vehicle movements presently approved for the Waste Transfer Site, but is in excess of the current daily vehicle movements. Additionally, vehicle movements should include those for the adjacent Wienerberger UK brickworks. Clearly an accurate traffic survey is required to record the current movement of all vehicles serving these sites. There is no guarantee to ensure that vehicle movements are not increased over and above the current approval to cater for an expanded Waste Transfer Facility.

Furthermore access to the incinerator would be on residential roads which will ultimately form an integral part of the North of Horsham Development. This would be totally untenable, due to sizing of the roads being inappropriate for commercial vehicles, access to the incinerator being through a residential area, the presence of odours from untreated waste and the vehicles being a danger to pedestrians and creating noise pollution.

Due to the location of the proposed incinerator, the massing of the building and chimney and the proposed routing of vehicles through a residential area, we consider the proposals for an incinerator at Langhurstwood Road to be inappropriate. Therefore we object to Planning Application WSCC/015/18/NH.

Yours faithfully,



David Griffiths. (secretary to Horsham Society Planning Sub Committee)

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**From:** Antony Henderson [REDACTED]  
**Sent:** 02 May 2018 19:01  
**To:** PL Planning Applications  
**Subject:** Planning Ref WSCC/015/18/NH

Dear West Sussex County Council

Planning ref: WSCC/015/18/NH at Wealden  
Brickworks, Langhurstwood Road, Horsham,  
West Sussex, RH12 4QD

I live in Greenfinch Way, North Horsham and  
am writing to object to the above planning  
application.

The proposals for an incinerator does not meet WSCC waste  
plan for the following reasons:

Strategic Objective 5: to make provision for a new transfer,  
recycling and treatment facilities as close as possible to where  
waste arises. The scale and throughput of the proposed plant is  
incompatible with the disposal of local waste and will attract  
material from outside of the county.

It is clear that this proposal goes against the WSCC waste  
policy to recycle close to origin of waste.

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  
enhance the natural environment.

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.....

The proposal will have a dramatic effect on the character of  
Warnham and Horsham and so we believe it does not meet the  
criteria.

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. This incinerator clearly does not meet this requirement.

### Visual Impact

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

### Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### Recycle

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

NB: <https://www.telegraph.co.uk/politics/2018/03/01/recycling-rates-fall-half-local-authorities-councils-switch/>

### Noise Pollution

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### Flue Stack

At the Britaniacrest exhibition the organisers detailed that the

stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

Not Needed

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

Air Quality


The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes everyday bringing car pollution to our rural doorsteps. WSCC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and as waste will be imported into Horsham to burn.

NB Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

Please ensure this objection is registered for the reasons stated above.

Yours sincerely  
Antony Henderson

  
3 Greenfinch Way

Horsham  
RH125HB

Sent from my iPhone



**From:** [Debbie Fitzpatrick](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to planning application WSCC/015/18/NH  
**Date:** 02 May 2018 20:13:45

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As residents of Horsham area we would like to strongly object to the proposed incinerator being built.

Planning ref: WSCC/015/18/NH at Wealden Brickworks,  
Langhurstwood Road, Horsham, West Sussex, RH12 4QD

The proposals for an incinerator does not meet WSCC waste plan:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Horsham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty.

## **Light Pollution**

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 site would become a permanent hazard for all aircraft.

The stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

## **Recycle**

WSCC have shown a 2% increase in recycling and so to burn would captivate the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London.

The Biffa bio-mechanical digester that taxpayers paid for to deal with household waste will virtually become redundant as the proposer has stated that they intend to burn black sack waste as well as industrial.

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSSC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

## **Noise Pollution**

As the site will be [24/7](#) it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

## **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

## **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

## **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps. WSSC in their recent Connect magazine detailed that vehicles, 80% of nitrogen dioxide concentration at the roadside is caused by road transport.

This proposal would bring lorries on the dangerous A24, congested A264, A29, M23, and so the list goes on, as waste will be imported into Horsham to burn.

It is clear that the small particles are not captured by the current levels of air quality and thus are seen to be causing breathing issues, especially in the young and old.

## **Operations**

Britaniacrest have made it clear that they do not intend to run the site and so we are very concerned about the on going operation of an incinerator as previously experienced with the landfill site before Biffa took over.

## **Not linked to the national grid**

Unlike Germany, which has linked its incinerator to the national grid, there are no plans to do this with this proposal or funding, we therefore presume that it would fall to the taxpayer to pay for any infrastructure that would be required.

Sent from my iPhone 6 Plus

**From:** [Graham Burling](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Ref WSCC/015/18/NH  
**Date:** 02 May 2018 20:46:15

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**Dear Sirs**

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

Please register my OBJECTION to this application

### **General principles**

Britaniacrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to 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 taxpayers money.

The site is too small and unsuitable. Due to lack of land Britaniacrest propose to build double height with an extremely tall chimney that is far higher than the existing brickworks chimney itself a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

### **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 5 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 overcapacity 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. It seeks waste from outside the local area and thus 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 be lit like a Christmas tree producing 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 3-5nm 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 for 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.

Yours faithfully

Graham Burling

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

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**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

**From:** [Zoe Burling](#)  
**To:** [PL Planning Applications](#)  
**Subject:** OBJECTION Reference WSCC/015/18/NH BritaniaCrest Warnham Brickworks Incinerator  
**Date:** 02 May 2018 21:03:56

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Dear Sirs

Please register my OBJECTION to this application

### **General principles**

Britaniacrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to 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 taxpayers money.

The site is too small and unsuitable. Due to lack of land Britaniacrest propose to build double height with an extremely tall chimney that is far higher than the existing brickworks chimney itself a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

### **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 5 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 overcapacity 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. It seeks waste from outside the local area and thus 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 be lit like a Christmas tree producing 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 3-5nm 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 for 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.

Yours faithfully

Zoe Burling

2 Bakehouse Barn Close, Horsham, West Sussex, RH12 5JE

**From:** [Claire Burling](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Incinerator objection.  
**Date:** 02 May 2018 21:14:06

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

Please register my OBJECTION to this application

### **General principles**

BritanicaCrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to 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 BritanicaCrest 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 taxpayers money.

The site is too small and unsuitable. Due to lack of land BritanicaCrest propose to build double height with an extremely tall chimney that is far higher than the existing brickworks chimney itself a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

### **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 5 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 overcapacity 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. It seeks waste from outside the local area and thus 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 be lit like a Christmas tree producing 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 3-5nm 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 acknowledged 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 for 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.

Regards,  
Claire Burling.



**From:** [Dawn Cornfield](#)  
**To:** [PL Planning Applications](#)  
**Cc:** [david.sheldon@westsussex.gov.uk](mailto:david.sheldon@westsussex.gov.uk); [Nigel Dennis](#); [Morwen Millson](#); [elizabeth.kitchen@westsussex.gov.uk](mailto:elizabeth.kitchen@westsussex.gov.uk); [Louise Goldsmith](#); [Dave Cornfield](#)  
**Subject:** Planning application objection - ref WSCC/015/18/NH  
**Date:** 02 May 2018 21:24:02

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Dear Sir/Madam

I am writing to you to raise my deep concerns and objections to the proposed incinerator at North Horsham. As a local resident within one mile of the proposed development I think it is only fair that I have a say in something that will materially impact myself and my family.

My objections focus on the following points:

### **1. Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

## **2. Light pollution**

The 96m chimney will be lit 24 hours a day, thereby increasing light pollution to the local area.

## **3. Recycling**

WSCC have shown a 2% increase in recycling. Burning waste may hold the council in long term contracts to keep the incinerator burning. It is inevitable that recycling will drop, as is already 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.

The proposer has stated that they intend to burn black sack waste as well as industrial waste. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## **4. 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.

## **5. Visual impact of the proposed development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## **6. Environmental impacts**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK.

The site will also involve increased traffic from heavy vehicles transporting waste, resulting in increased diesel emissions, noise, and the use of vehicles wholly unsuitable for local country roads.

I hope that you carefully consider these arguments when considering the proposal.

Yours sincerely

Mr and Mrs Cornfield

**From:** [Natasha Price](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Objection to WSCC/015/18/NH  
**Date:** 02 May 2018 23:07:33

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To whom it may concern.

Re: WSCC/015/18/NH

I would like to object to Britaniacrest's planning application to build a new incinerator at the Old Warnham Brickworks site based on the following reasons:

## **1 Non-compliance with WSCC's Waste Local Plan**

### **Strategic Objective 5:**

*5.3.5. 'The waste that is generated must be managed locally, where practicable and viable, reducing the need for the transportation of waste over long distances. Accordingly, the intention is that there will be a network of waste management facilities within or close to the main towns along the coast and in the north-east of the County, and within or adjoining the larger settlements in rural areas. The aspiration is that new waste management facilities will be built to support economic progress by complementing the existing network of facilities to maximise the amount of waste recycled, composted, and treated.'*

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

An incinerator this size will clearly be taking in commercial and industrial material from a large area of the SE England; and therefore increasing transportation over long distances rather than reducing.

### **Strategic Objective 10:**

*5.3.11 'Similarly, the historic environment of West Sussex, which has many national, regional and locally important sites and buildings, will be protected and, where possible, enhanced.'*

*Strategic Objective 10: To protect and, where possible, enhance the natural and historic environment and resources of the County.*

This oversized incinerator will be a blot on the landscape (being visible from 15kms away).

We can also expect potentially dangerous, damaging pollution from it's emissions which will no doubt have an impact on this area of outstanding beauty. Not to mention the Warnham Nature Reserve just a short distance away. There will be an increase in HGV traffic around the area, which will also cause further deterioration of air quality and congestion on the roads.

### **Strategic Objective 13:**

*5.3.14 Throughout the plan period, new facilities will be located so as to minimise any potential impacts on communities and the potential negative impacts of any new waste development on the health and amenity of residents, businesses and visitors to West Sussex will be minimised, mitigated and, where possible, avoided. In addition and where relevant, opportunities will be taken to maximise benefits for communities, and the environment.*

*Strategic Objective 13: To protect and, where possible, enhance the health and amenity of residents, businesses, and visitors.*

At this time the health impacts of waste incinerators are not clear. It will be being built in an area which is already populated with schools & family homes but in addition will be an even more densely populated area with the new North Horsham development and other planned

developments. At the very least, we should wait until the health study by Public for England has been released.

## **2 Visual Impact of the development**

Given that it will be in a rural countryside location, the size of it has a massive and totally unacceptable impact on the landscape. This will be even worse when the plume height is taken into account. In addition, there will be light pollution at night for aviation lighting.

In summary, I have lived in the North Horsham area for 18 years and am well aware of when the wind changes we can still smell the landfill in Langhurstwood Road. This is nowhere near as bad as it used to be and I'm pleased that steps were taken to improve the situation for local residents. I do not want to return to those days with the feeling that you can't open your house windows or hang washing out for fear of the pollution that will come in to the home, which at best would be a short term inconvenience but at worse causing long term health issues for myself or my children. I also feel that other areas should be making more of an effort to reuse/recycle their waste and we should not just be encouraging them to dump it on our doorstep to deal with.

Please DO NOT approve the planning application for this unwanted incinerator.

Kind Regards

Natasha Price  
29 Byron Close  
Horsham  
RH12 5PA

Application No: WSCC/015/18/NH

## OBJECTION

I write to **STRONGLY OBJECT** to this application.

I reiterate everything I objected to when permission was first sought for this venture in 2017.

The mere idea of building an Incinerator of such proportions and on such a small site so close to the North of Horsham development which has recently been approved is unthinkable. This would loom large over the proposed 2500 new homes, schools, playing fields and all amenities that come with a new neighbourhood, who would choose to live in it's shadow? The World Health Organisation state that incinerators should NOT be built near populated areas, so why is this even being considered a viable option? This is a semi-rural area with local farm land, where both crops and livestock are grown for human consumption, Warnham Nature reserve is within very close proximity. All of these factors are good reasons why this application should be rejected'

If given consent it would give rise to many further potential issues:

### NOISE:

An increased noise level 24/7 365 days of the year from the new plant. As a resident in the immediate area I regularly have to tolerate the drone of fans from the Biffa installation, I do not welcome any increase in noise pollution.

Increased traffic noise, more HGV movements during construction and the increased level of staff traffic. Note: That while the increased HGV movements may still be within the existing approved planning, there will still be an actual

substantial increase in movements from today's current level.

## POLLUTION:

The emission of greenhouse gases, dioxins and heavy metals for the immediate and surrounding areas.

The constant flow of HGV's will disperse harmful diesel fumes to the local area and further afield.

Night time light pollution from the chimney needing to be lit 24/7 to warn air traffic. As a resident in close proximity to the proposed site this will undoubtedly affect our quality of life! And that of the local wildlife.

Highly toxic remains will need to be transported to elsewhere in the country and then put in specialist land fill sites thereby increasing the risk of further pollution for generations to come, the risks of yet unknown.

## VISUAL IMPACT:

In the resubmitted application I note the building has been slightly reduced in size and the colour palette altered, however, it will still remain a 'Blot on the landscape': A chimney of 95 metres tall which I understand as yet the final design has not been decided, how can you approve these applications without a final design? Any such construction would be seen for miles around, spoiling the landscape for many. Such an excessive size for this location is completely unacceptable.

## HEALTH:

There are known risks to health linked to emissions from incinerators, including carcinogenesis, fertility problems, neurological and cognitive development in infants as well as immune suppression, also possible links to infant mortality.

## INFRASTRUCTURE:

The local roads:

Horsham's roads are snarled up every day, HGV's coming in from outside of West Sussex and further afield will lead to longer delays than already experienced, for a much wider area. The A24, A264 and more importantly Langhurst Wood Road at present are incapable of any further increase in traffic volume, particularly, when it is proposed to bring industrial and commercial waste in from other counties in the south east.

In addition, on reading the Britaniacrest application I note that in Vol 1, Chapter 13 Population and Health, Table 13.1 Health Pathways: Looking at both the Construction Phase and the Operational Phase, the potential implications on air quality, noise exposure, local transport are all Adverse with the only potential benefit being the increased in employment during construction and the potential of up to 50 permanent positions when operational. I would say that the health of a region should without question outweigh any other consideration.

As a resident of Langhurst Wood Road, I already have to tolerate the constant stream of traffic from Biffa, Weinerberger and Brittaniacrest, and the diesel fumes they bring with them. Frequently HGV's thunder up and down the road without adhering to the current speed limit making it almost impossible for me to leave my house on foot. I feel I take my life in my hands every time I attempt to cross Langhurst Wood Road in order to access the amenities of Warnham or to use the railway station. The road is constantly strewn with litter that comes from the Brittaniacrest vehicles, a daily problem with which we have to contend. During construction of any such utility these problems will only be exacerbated and I feel I would be severed from the community even more than I am now. **This is not a prospect I wish to have to consider on a daily basis.**



I urge you to give this the most meticulous investigation and consideration, making the correct decision for the local community and the lovely town that Horsham is today.

Given the go ahead this will inevitably reflect in the devaluing of property prices in Horsham, making it a far less desirable place to live and raise a family. Resulting in reduced council tax revenue and ultimately a decline in the whole area.

This is not a case of NIMBY, this should not be in anyones back yard!

The wrong decision could have serious implications not only for the current population but for generations to come. **Our children and grandchildren do not get a say in this but they are the ones that will bear the brunt of any long term health issues that occur.**

**WSCC please listen to the people of Horsham and the surrounding areas.**

My over-riding objection to this development is that if this goes ahead we will be committing to 20-30 years or more to incineration of our waste.

- Waste that in part can still be recycled, especially with new evolving technology
- Waste that is becoming in short supply across Europe
- Waste that is decreasing in % terms as Reuse and Recycling and technology improve
- Waste that will include increasing volumes of recyclable material just to feed the incinerator
- Waste that will need to be imported from far afield to ensure sufficient volumes

This also comes at a time where there is a noticeable shift away from this technology and more focus on improving technology for reduction and recycling.

- An Early Day Motion 581 from MPs calling for a Moratorium on new waste incinerators
- We already have an over capacity for incineration across Europe leading to a race to the bottom
- The World Health Organisation has stated that no new incinerators should be built in a populated area
- Plastics have hit the headlines and the way forward is to reduce production and improve reuse and recycling it is NOT to burn plastics which will release toxins into the environment
- More studies showing links between incinerator sites and reduction in local health including increased cancer and birth defect incidents. Can Britaniacrest truly PROVE this wrong beyond any doubt?

More focused objections remain similar to the original objections to the application early last year and are summarised as follows:

**Community Engagement** – The efforts made to fully inform the local and wider community of the proposed development have been inadequate. Limited public exhibitions and press notices have been low key and did not hit sufficient penetration for such a big development. A survey undertaken in Horsham town centre found that the vast majority of people asked, were not aware of the plans and those that were, were mainly not aware of the details.

**Size, Capacity and site of installation** – The site is too small for the size of the building and operation, similar sized installations around the UK sit within much larger sites.

The planned capacity of the incinerator is beyond requirements and will require the import of waste material from afar to keep it fed as waste volumes reduce with greater recycling.

The siting within a semi-rural area and next to the approved North of Horsham housing development will be a blot on the landscape and a health hazard for the new houses and schools to be built nearby

**Noise, light and air pollution** – Local residents already put up with significant background noise from existing landfill and brickwork operations, this new development will just add to this.

HGV movements will increase – while BC have stated there will be no increase this is not true and they admit to an increase in HGV movements over the current levels but that they will be within the current permitted planning levels. BUT we will still an increase of potentially double the current levels.

Existing traffic levels already prevent local residents from leaving their home on foot due to a lack of a footpath along Langhurst Wood Rd

Litter along Langhurst Wood Rd as well as other local road networks is already appalling and will only get worse with the additional movement of rubbish for incinerator fuel

Light pollution will affect local residents and wildlife including breeding Red Kites and Bat colonies

#### **Other –**

By committing to burn our rubbish at this volume will cause our recycling targets to be missed, the two are incompatible.

BritaniaCrest's own report on Population and Health (table 13.1) states that there will be an adverse effect to the environment from Air Quality, Noise Exposure and Transport flow rates. In addition, it goes on to point out that the current area profile is of general better health and air quality than national average, so why would you then put this at risk by implanting an incinerator into this environment.

There is insufficient study into the distribution of pollutants once leaving the stack. Effects of aircraft vortex have not been modelled nor has the fact that the Warnham area sits within a geographic 'bowl' which effectively traps air. This is frequently experienced with the odours emanating from the Landfill and MBT sites especially where weather conditions conspire to trap smells affecting local residents.

In summary this is the wrong development in the wrong place and at definitely, the wrong time. By the time this development could come on stream, it would already be out of date.

Kevin Slatter

**From:** [Andy Rankin](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Horsham Incinerator OBJECTION.  
**Date:** 03 May 2018 08:20:38

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

Please register my OBJECTION to this application

General principles

Britaniacrest bought land in Horsham and got planning for recycling and transfer waste operations.

This proposal is to add a huge incinerator onto this site to 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 taxpayers money.

The site is too small and unsuitable. Due to lack of land Britaniacrest propose to build double height with a flue stack chimney that is some 96m tall and far higher than the existing brickworks chimney, which itself is a visually-intrusive landmark. The roof is arched to blunt perceptions of the enormity of the building, but the fact remains that it is far too big and high for this site.

The size of the construction is excessively large and the height of the flue stack will have a major impact on Horsham and the surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

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 5 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.

All these factors together will lead to a reduction in recycling, when WSCC have achieved a 2% increase in recycling over recent years. Burning waste has a very real prospect of holding the council into long term contracts in order to keep this waste hungry incinerator burning. It is inevitable that recycling will drop, as is the case in London. The Government is already beginning to consider compelling evidence that there is overcapacity 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. It seeks waste from outside the local area and thus 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. This is sited in an area that has and is continuing to see mass over development of land, both pre-existing sites and on green belt land. (Liberty

Property Trust North Horsham, Kilnwood Vale and the Britaniacrest site) Not to mention on going developments in and around Southwater.

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. This is sited in an area that has and is continuing to see mass over development of land, both pre-existing sites and on green belt land. (Liberty Property Trust North Horsham, Kilnwood Vale and the Britaniacrest site) Not to mention on going developments in and around Southwater. The Horsham area is experiencing huge over development with little or plans for alleviation of the traffic issues that will be caused by the extra traffic travelling to and from this site and all the other surrounding (recently approved) developments.

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 have a 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 be lit due to its close proximity to Gatwick Airport and will produce a significant increase in light pollution from the plant. Notwithstanding the visual impact on the surrounding area of a huge 95m brightly lit offensive looking chimney.

Flight paths: Flight paths are not represented fully or accurately in the proposal. For the CAA to demand that 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 3-5nm 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 acknowledged 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 for 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.

Regards,

Andrew Rankin

Sent from my iPhone



From: Neil Pitcairn

Bindura, The Avenue, South Nutfield, Surrey RH1 5RY

[REDACTED]

Tel. [REDACTED]

To: West Sussex County Council Planning Dept.

planning.applications@westsussex.gov.uk

Date: 3 May 2018

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

**Objection and comments**

1.1 I am resident within the catchment area served by Britaniacrest Recycling Ltd, and consider myself to be potentially affected by the operations proposed at the site.

1.2 I am also a director of UKWIN (United Kingdom Without Incineration Network) whose National Coordinator Shlomo Downen has submitted a separate 15 page objection by email. I wish to support Mr Downen's submission and add some complementary comments.

**2.0 Carbon Assessment (Volume 3, Appendix 2.3)**

2.1 I believe it is useful to compare an estimate of net CO2 emissions per kWh for the proposed incinerator with UK targets for new electricity generating capacity being attached to the national grid. This will establish whether electricity supplied by the incinerator will have any real value.

2.2 UKWIN quotes the Environment Agency as saying "Between 0.7 and 1.7 tonnes of CO2 is generated per tonne of MSW [Municipal Solid Waste] combusted". This broad range depends on the carbon content of the waste being burnt, and the applicant has given no indication of the expected carbon content of the waste to be burnt at Warnham. However, usefully, Cory Brothers provided a figure in 2017 for their quite recently built Riverside incinerator at Belvedere in SE London; that figure was 27% carbon content, and for the sake of this submission I will use that as a reasonable example.

- 2.3 The desired throughput at Warnham is 180,000 tonnes per annum. 27% of that figure amounts to 48,600 tonnes of carbon. When waste is incinerated the carbon (C) in the waste is combined with oxygen (O) to make carbon dioxide (CO<sub>2</sub>) which is then released into the atmosphere. As we know the differences in mass between carbon (12g/mol) and carbon dioxide (42g/mol) we can calculate how much CO<sub>2</sub> will be released. By writing the calculation  $48,600 \times 42/12$ , we arrive at 170,100 tonnes of CO<sub>2</sub> per annum, which is remarkably close to the Environment Agency's upper estimate.
- 2.4 The applicant estimates that 18MW of electricity will be available to be exported, and I will be generous and assume that it could be exported 365 days per year, 24 hours per day, in other words 8760 hours per annum.  $18\text{MW} \times 8760$  gives us 157,680 MW hours per annum.
- 2.5 Dividing the tonnes of CO<sub>2</sub> per annum by the MW hours per annum will indicate the amount of CO<sub>2</sub> per kWh; thus  $170,100 / 157,680 = 1.078$ ; which can be interpreted as 1,078 grammes per kWh.
- 2.6 To abide by current conventions, the non-fossil proportion of the waste can be regarded as carbon neutral. The applicant has indicated that 44.75% is "putrescibles", 9.77% is paper, and 4.19% is cardboard, giving an estimated total 58.71% non-fossil content. Using these proportions I calculate as follows:  
 $1,078 \text{ g} \times 58.71\% = 632 \text{ grammes of non-fossil carbon per kWh.}$   
 $1,078 \text{ g} \times 41.29\% = 446 \text{ grammes of fossil carbon per kWh.}$
- 2.7 Unfortunately for the applicant, 446 grammes is way above the UK government's desired level of carbon intensity for new electricity generating capacity. Now that coal is being phased out (and in recent weeks it has been reported that no coal at all has been used to generate electricity in the UK), the benchmark for the maximum desired carbon intensity is combined cycle gas turbine. In 2018 the benchmark figure is 280 grammes per kWh, reducing to 270 grammes in 2020, and progressively thereafter. The projected grid average for grid generation in 2030 is 104 grammes per kWh (Updated Energy & Emissions Projections 2017, published by BEIS January 2018, Page 35, figure 5.2).
- 2.8 I have to suggest therefore the applicant's proposal to connect the incinerator to the national grid has no value whatsoever. Indeed it could undermine national government policy to decarbonise the electricity

supply and could risk supplanting genuinely lower carbon generating capacity.

### 3.0 Use of CHP (combined heat and power)

3.1 The applicant has no ready client for waste heat from the incinerator and admits that the incinerator may have to operate in electricity-only mode for years. Experience elsewhere in the UK shows that building district heating infrastructure is expensive and usually requires investment from other parties such as local authorities. It does not remove the need for additional local heating systems to provide for times when the main system is down. Hence very few district heating systems have been attached to incinerators in the UK, and where they are, they do not necessarily work at full efficiency, ie 365 days per year, due to warm weather in the UK summer.

3.2 The use of heat from an incinerator does improve its overall efficiency, but drawing heat from the system does diminish the efficiency with which electricity is generated, as the applicant acknowledges. A report produced by Eunomia for Friends of the Earth in 2006 includes an estimate that total direct biogenic and fossil CO<sub>2</sub> emissions are 1,645g CO<sub>2</sub>e/KWh for electricity-only incinerators and 1,086g CO<sub>2</sub>e/KWh for CHP incinerators.

3.3 At page 9 of the Carbon Assessment (Vol.3 Appendix 2.3) the applicant writes: "In the CHP scenario, potential heat demand an overall emissions factor of 0.22963 kgCO<sub>2</sub>e/kWh heat displaced is used, taken from the boiler displaced data stated in 2016 Government GHG Conversion Factors for Company Reporting (September 2016)." I would suggest the applicant is asked to describe in more detail the carbon intensity of heat generated and used, and how this will fit with emerging government policy for CHP efficiency ten and fifteen years hence.

### 4.0 Need and Alternatives Considered

4.1 Given that electricity generated by the incinerator would have no value in the national context, as explained above, and could even delay decarbonisation of the national grid, the alternative reasons for proposing an incinerator at Warnham acquire more importance, including in this context the match of feedstock to the method of treatment.

4.2 The only breakdown of the proposed feedstock in the application documents appears in the Carbon Assessment

(Volume 3, Appendix 2.3) at Page 7 Table 1. Given that Britaniacrest is a C&I waste collection and sorting company of many years standing, the lack of detail in the feedstock list is surprising and disappointing. The applicant seems to have done little preparation, having provided no assessment of calorific values, carbon content, nor of the single biggest item in the list: “putrescibles”. What exactly are these putrescibles? Garden waste? Food waste? Waste wood from DIY and construction projects? Britaniacrest has been ideally positioned to obtain and present this information, and yet has not bothered to do so.

- 4.3 If “putrescibles” are really garden waste and food waste as most of us would assume, then incineration is hardly the most appropriate treatment option given the generally low calorific value and the need sometimes to dry such waste before incineration. Windrow composting and anaerobic digestion are respectively the most appropriate treatments, and the best performing in CO<sub>2</sub> performance.
- 4.4 In Volume 3 Appendix 3.1, Alternative Technology Assessment, at paragraph 3.4.3, the applicant dismisses the use of anaerobic digestion on the grounds that the content in the waste stream of suitable waste will be too small to make it effective. This suggests that a more detailed assessment of the waste stream has been compiled but has not been made available as part of this application. This is not helpful to consultees or planning officers, and should be rectified as soon as possible to enable full consultation and an informed decision.
- 4.5 We therefore have to guess that the biggest item in the waste stream, perhaps as much as 40%, is garden waste and/or waste wood, all of which if not contaminated with hazardous chemicals are suitable for composting. At paragraph 3.4.1 of Volume 3 Appendix 3.1, Alternative Technology Assessment, the applicant states that “Composting is not considered to be an appropriate technology for the applicant site.” No reasons are given for this statement, even though composting is clearly the most appropriate treatment. Is it the size or location of the site? Is it that the applicant cannot be bothered to find a more appropriate site, or reroute these materials to another site and waste operator with the right skill set for composting. Is the applicant unwilling to develop on site the required skills for composting? The applicant should be asked to provide a fuller explanation.
- 4.6 Given that the other materials in the feedstock list are all generally recyclable provided they are separately collected and presented for treatment, it is hard to avoid the impression that Britaniacrest are making little or no effort to move collected materials up the waste hierarchy, and are adopting a passive, unimaginative and

retrogressive approach, merely accepting mixed and contaminated waste streams without attempting improvement. This hands-off approach is confirmed by the statement at paragraph 3.3.6 of Volume 1 Chapter 3 Need and Alternatives Considered which reads: “Furthermore, since the facility would be the receiver of the wastes and would not be engaged directly with the waste producer, nor with the method of collection of the wastes, alternative options for the collection methodologies and logistics were not considered.”

- 4.7 At a time when national government and local authorities are all wishing to drive up reuse, recycling and composting, when national recycling targets are likely to rise and match or exceed EU targets, such a passive approach by a waste operator is disappointing and is unlikely to help us move towards a more circular economy. No environmental NGOs regard incineration as playing any part in a circular economy despite attempts by some waste operators to persuade to the contrary.
- 4.8 Commercial & Industrial (C&I) waste, which is Britaniacrest’s speciality along with C&D waste, is generally regarded as easier to recycle than municipal waste, being usually more homogeneous, predictable, and regular, and often separated by the client at point of collection. Britaniacrest is therefore in a better position than municipal waste collectors to find long term markets for clean recyclates. It is also in a better position to improve the source separation of what is delivered to its site. If the applicant wished to encourage better source separation by its own clients or by intermediary waste collectors, it could try imposing stricter terms of business or introducing incentives. Such moves are within its power. Before approving the building of an incinerator (which is essentially an admission of failure), I would expect planners to ask what alternative business models the applicant has considered or trialed to drive up the quality and volume of source separated recyclates, and what initiatives the applicant is planning to encourage and facilitate reuse and local circular economy solutions.
- 4.9 If Britaniacrest fail to engage with circular economy initiatives, actively working to promote reuse and facilitating much higher rates of recycling, they have to be regarded as part of the problem and not part of the solution.
- 4.10 At paragraph 3.2.3 and 3.2.4, Volume 1 Chapter 3, Need and Alternatives Considered, the applicant argues that there is a looming capacity gap in UK residual waste treatment, using reports by BIFFA, Suez and the ESA. This is still disputed, and a response to the ESA was made by consultants Eunomia. I attach a briefing note prepared by UKWIN in November 2017 for the London Assembly which includes detail of the response by

Eunomia. UKWIN and Eunomia continue to believe that there is sufficient waste disposal capacity in the UK and that there is risk of a surfeit. This has already been apparent in the north of England where Veolia has struggled to find enough waste to feed its incinerator-driven district heating system in Sheffield and has been forced to get permission to import waste from a wider catchment area. In Hampshire Project Integra was rolled out as the first integrated waste collection, recycling and disposal scheme in England, with three incinerators built at Basingstoke, Portsmouth and Southampton. It was not long however before Hampshire recycling rates began to flatline and lag behind other parts of the UK. This experience has been replicated in Denmark where government policy is now to roll back incineration capacity to allow recycling rates to rise. Where there is surplus capacity operators are minded to offer discounted gate fees to attract new customers and this can negatively impact investment in reuse and recycling.

4.11 I have noted that Britaniacrest hold a 5 year contract to ship RDF produced by BIFFA to incinerators in mainland Europe from the Warnham site.

4.11 At paragraph 3.2.7, Volume 1 Chapter 3, Need and Alternatives Considered, the applicant suggests that: “If constructed, and subject to public procurement regulations, the proposed 3Rs Facility would provide a potential treatment point for the RDF, significantly reducing the carbon footprint compared to the current export arrangements and maintaining the resource within the UK economy.”

4.12 The applicant provides no evidence to support the suggestion that the carbon footprint would be reduced, and it should therefore be disregarded. There are several CHP schemes in mainland Europe which depend on exports of RDF from the UK to keep the district heating systems in operation - the result of incinerator over-capacity in northern Europe. Typically these are CHP systems built in a planned and integrated way, and very probably more efficient than ad hoc CHP systems added as afterthoughts in the UK. Until the applicant can provide detailed life-cycle and carbon footprint analyses of the particular CHP destinations to which the RDF is now being shipped, and compare these with an incinerator operating very probably in electricity-only mode at Warnham, there is no justification in considering this suggestion. Although environmental NGOs in mainland Europe regard these incineration based CHP systems as contributing to climate change through their CO<sub>2</sub> emissions and wish them to be phased out over time, it is arguably better in the short to medium term to ship RDF from the UK to these plants rather than burn it in less efficient plants in the UK, or worse still open new incinerators to burn it.

- 4.13 The applicant argues that the RDF is a resource which should be maintained within the UK economy. However burning the RDF in a UK incinerator only contributes to the UK economy if helps decarbonise the UK's electricity generating capacity in line with government targets; it otherwise incurs a calculable carbon cost. As I have demonstrated at 2.7 above, there is little chance of it being an asset rather than a cost.
- 4.14 The applicant also suggests that a new incinerator may contribute to the UK's energy security. This security is dependent on there being adequate feedstock. As indicated above, shortages of feedstock have been occurring in the UK as in mainland Europe, and incinerators may only be able to secure feedstock by offering discounted gate fees, putting at risk the financial viability of the enterprise. The energy security argument should be disregarded.
- 4.15 We have all been made aware in the last year of the global plastic pollution crisis, and we are now aware of government and industry responses to this. The UK government is acting to reduce the amount of single-use hard-to-recycle plastic in circulation. The retail sector is under pressure and is committing in some places to reduce or phase out single use plastic packaging. Bio-plastic manufacturers in Scandinavia are investing heavily in new factories to produce compostable packaging suitable for food stuffs. Academic institutions which have isolated enzymes capable of breaking down plastics to reusable molecules are now racing to commercialise them and make them available for industrial use. Whereas a short while ago the fossil fuel plastics industry was forecast to double in size, there is now speculation that it will shrink as demand slackens and alternatives appear. Fossil fuel plastics are an important part of incinerator feedstock. Britaniacrest cannot assume their long term availability. The applicant should therefore be asked to review the "Needs" assessment taking into account UK and global trends over a 10 year perspective, or even 25 years as that is the average life-span an incinerator requires to recoup the investment.
- 4.16 The applicant's Britania Bulletin (January 2018) indicates that up to 35 new jobs would be created if the incinerator is built. Studies for WRAP and others usually indicate that more jobs are created and more energy saved when materials are reused, recycled and composted.
- 5.0 I therefore request that the planning application be refused or that the applicant be required to provide fuller information on the points I have raised.



**This bundle is comprised of the following documents:**

**UKWIN briefings to support the case for a moratorium on new waste incineration capacity (October 2017):**

- The 'Incineration overcapacity' briefing supports the case that there is no need to build any more incinerators to deal with the UK's genuinely residual waste.
- The 'How incineration harms recycling' briefing supports the case that our current excess incineration capacity is harming recycling and composting.
- The 'Circular economy and resource productivity' briefing supports the case that it is highly desirable to move from incineration towards a recycling society.
- The 'How councils can improve their recycling rates' briefing supports the case that there are opportunities to recycle and compost more.

**UKWIN's response to the ESA Parliamentary Briefing on the Role of Energy from Waste (November 2017).** Provides evidence in support of:

- Distinguishing between 'residual waste' and 'genuinely residual waste'
- Clarifying that incineration is not inherently preferable to landfill
- Industry's confirmation that more ambitious recycling targets are achievable
- The economic case of increased recycling.

**Eunomia's statement on Tolvik capacity report (Letsrecycle, 30 November 2017).**

- Eunomia's analysis of some shortcomings of the Tolvik report. When these shortcomings are corrected, the Tolvik report confirms that there is currently significant incineration overcapacity in the UK.

**UKWIN's initial critique of 'Cory Riverside Energy: A Carbon Case' (December 2017)**

- UKWIN's analysis of some of the Cory report's shortcomings. When these shortcomings are corrected then sending waste to incineration at the Riverside incinerator is confirmed to be between 6.7m and 10.5m tonnes worse than landfill in terms of total CO2 emissions.



## Incineration overcapacity



**Incineration overcapacity wastes money that should be invested in recycling and composting. A compelling argument against allowing new incinerators is that there just won't be enough genuinely residual combustible material to keep them fed. High rates of incineration are inconsistent with more ambitious recycling targets.**

Some in the waste industry define overcapacity as the point where current capacity exceeds current demand. They then often proceed to underestimate capacity and overestimate demand, especially those with a financial stake in building new incinerators. However, a more practical approach defines overcapacity as where capacity built and under construction is higher than future demand would be were we to reduce, re-use and recycle in line with the waste hierarchy. It makes no sense to talk about a 'capacity gap' for incinerators to burn material that could and should be recycled or composted.

In 2002 UK household waste had been rising by 3% a year, and the Prime Minister's Strategy Unit noted that if this trend continued waste could double by 2020. Coupled with a recycling rate of less than 15%, this led to a 'residual waste scare', resulting in a big push for new waste incineration capacity at any cost. Since then, the range of materials that can be readily recycled has significantly increased, anaerobic digestion (AD) has become a preferred method for treating food waste, and waste levels have actually fallen. In recognition of these trends, the Government cancelled PFI funding for 11 incineration projects between 2010 and 2014 on the basis that their capacity was no longer needed to meet landfill diversion targets.

### Municipal waste then and now...

	Then (2002)	Now (2017)
Number of incinerators (UK)	11	64
Incineration capacity (UK)	2.6 million tonnes	17 million tonnes*
Tonnes arising (England)	29 million	26 million
Tonnes incinerated (England)	2.5 million	9 million
Percentage incinerated (England)	9%	35%
Recycling rate (England)	14%	42%

\* Existing and under construction (only incineration, not total residual treatment capacity)

However, due to a combination of inertia, contractual commitments, low ambitions for recycling and perverse financial incentives to burn recyclable waste, the number of incinerators has kept on growing and without intervention will continue to grow even though we already have incineration overcapacity.

Unlike the waste industry studies produced simply to promote incineration, the waste capacity forecasts from environmental consultancy Eunomia are more independent and were unsurprisingly the only figures cited in the Government's Energy from Waste Guide. Eunomia's July 2017 Residual Waste Infrastructure Review (RWIR) states: "In 2017, given the level of residual waste treatment infrastructure already committed, we forecast that the maximum recycling rate achievable in 2030 if all treatment capacity is fully utilised has fallen to 63%...in scenario 1, our analysis suggests that the UK's supply of capacity will exceed the available quantity of residual waste in 2020/21...The level of excess demand rises to 9.5 million tonnes in 2030/31..."

## Residual treatment overcapacity\*



\*Calculation of residual treatment overcapacity based on Eunomia RWIR Scenario 1 (July 2017). 10.4 million tonnes of waste is expected to be available for residual treatment in 2030. When we take away the 14.9 million tonnes of current (2017) operational residual treatment capacity, and take away the 4.5 million tonnes of capacity currently under construction (in 2017), we are left with a residual treatment overcapacity (without further new construction) of 9 million tonnes.



## How incineration harms recycling



### Recycling is harmed by incineration because:

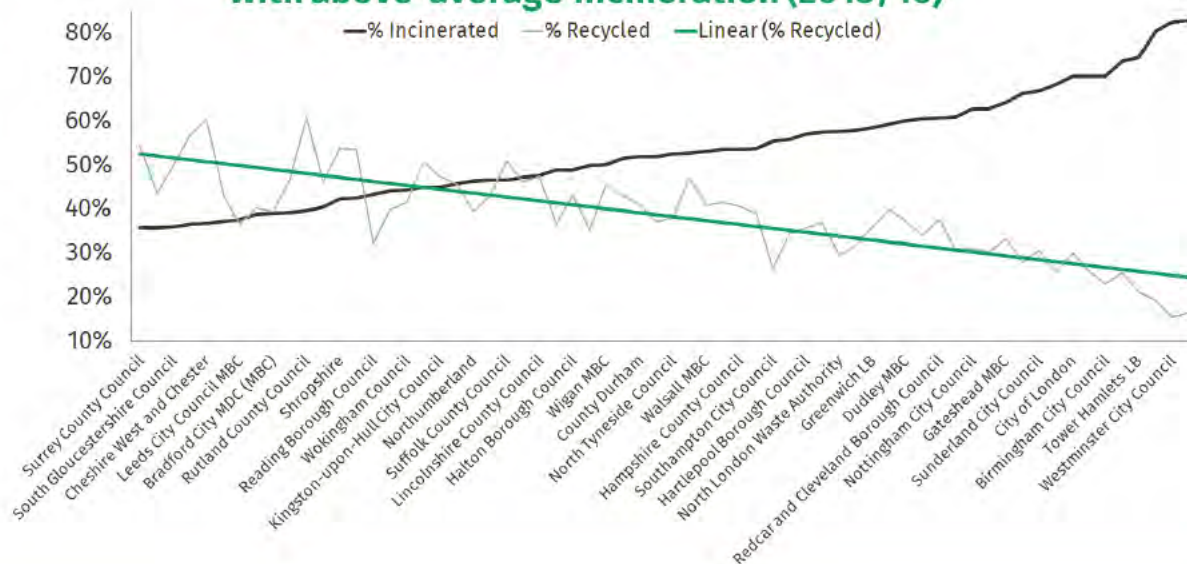
- Much of what ends up as incinerator feedstock is not genuinely residual waste, it is material that could and should have been recycled and composted.
- The prospect of worsening incineration over-capacity discourages investment in recycling by reducing the market for, and confidence in, recycling infrastructure.
- Money and feedstock are locked in to existing and proposed incinerators and this reduces flexibility and means that money is diverted from investment in recycling and that feedstock becomes unavailable for reprocessing.
- For a range of reasons including Government subsidies, environmental externalities, and put-or-pay contracts, the true cost of incineration is not reflected in the price of treatment. This means that the return on investment in recycling and recycling education is undermined.

Taken together, these factors serve to perversely disincentivise councils and businesses from maximising high quality recycling of plastics, food and other waste, and in turn this reduces the market for such services, hampering investment in the research and development of technologies and the construction of domestic recycling and reprocessing facilities.

### Success factors contributing to high rates of recycling include:

- The widest array of materials being collected for recycling (e.g. separate food waste collection).
- The flexibility to increase the range of materials collected as they become easier and more profitable to recycle.
- The availability of sorting and treatment facilities that can recycle or compost this material.
- Recycling education so that people put the right things in the right bins.

### Municipal waste treatment rates for councils with above-average incineration (2015/16)



...lower [recycling] rates could result from an authority focusing on avoiding landfill by investing in incineration and targeting its waste management policies on that treatment solution, rather than poor recycling awareness or initiatives.

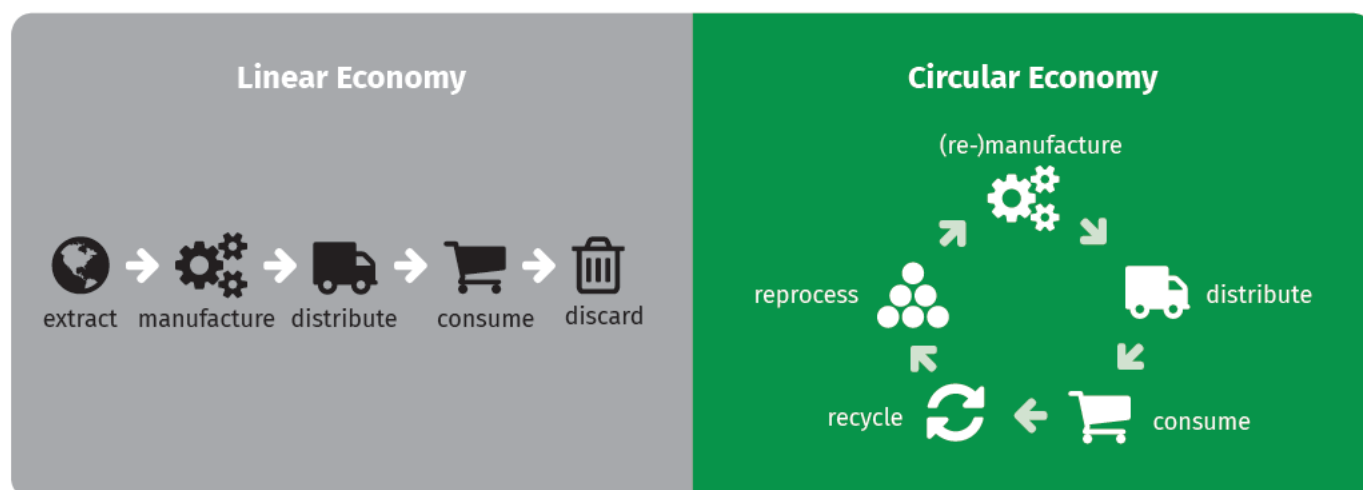
Defra (2012)

## The circular economy and resource productivity



### What is the circular economy?

The 'linear economy' relies on extraction and processing, followed by consumption and disposal (via incineration or landfill). Extraction and disposal deplete finite resources and cause environmental and social harm. With a circular economy the value of resources is preserved, material and nutrients that are needed to create new products are maintained, and the most is made of existing resources. Such prudent use of resources can be described as increasing resource productivity.



### Social, environmental and economic benefits of a more circular economy

#### → The Ellen MacArthur Foundation's list of key benefits of moving to the circular economy:

1. Substantial net material savings and reduced exposure to price volatility
2. Increased innovation and job creation potential
3. Increased resilience in living systems and in the economy

#### → Friends of the Earth estimated that reaching 70% recycling would create more than 70,000 jobs in the UK by 2025.

#### → WRAP estimated that by 2030 the circular economy could create more than 200,000 jobs and noted that these jobs could be focussed in areas where unemployment is higher.

#### → Redesign means creating products that last longer and that are more recyclable, reusable and repairable. This is good for consumers and supports the remanufacturing industry.

The Environmental Audit Committee noted: "There are potentially billions of pounds of benefits for businesses across the economy by becoming more resource efficient" and recommend that: "Reducing the dependency on primary resource use for economic growth is an essential part of moving to a more sustainable economic system. Some businesses are showing real leadership and innovation to adjust their business models and become more resource efficient. However, the Government must do more to ensure that the right conditions are in place so that many more businesses shift from a linear approach to a circular one."

### Incineration and the circular economy

Incineration has no place in the circular economy towards which we should be working. Incinerators depress recycling, destroy finite resources, and release greenhouse gasses. For every tonne of waste burned more than one tonne of CO<sub>2</sub> is released into the atmosphere, and this is significantly higher if one takes into account the CO<sub>2</sub> required to make the products in the first place. Thus, incineration is unsustainable and has significantly higher carbon intensity than burning gas or coal.



## How councils can improve their recycling rates



There is a significant gap between the councils with the highest recycling rates and those that lag behind. South Oxfordshire District sent 67% of their household waste for recycling, reuse or composting in 2015. In just one year Richmondshire District increased their recycling and composting rates by 14.7 percentage points, from 37.7% in 2014/15 to 52.4% in 2015/16. Lessons can be learnt from higher performing and rapidly improving areas.

**Invest to save:** Good quality recycling and composting may require short-term investment to yield long-term cost savings.

Council Waste Officers, Environment Portfolio Holders, Council Leaders, Chief Executives and Mayors are all able to work for their Council to achieve higher levels of waste reduction, reuse and recycling. There is also a great opportunity for councils to work together, especially where one council is responsible for collecting waste and another is responsible for treatment.

### Ways councils can improve recycling rates

- Provide a weekly food waste collection for composting or anaerobic digestion
- Ensure waste contracts reward reductions in residual waste by avoiding or exiting long-term waste incineration contracts
- Invest in waste education to save money that would otherwise be spent on disposal
- Introduce a re-use scheme for local bring sites (HWRCs)
- Promote re-use networks such as Freecycle and Freecycle, including to those seeking bulky waste collection
- Enhance commitment to green procurement and give preference to buying items that can be (or that have been) recycled
- Provide a free garden waste service for grass cuttings and hedge trimmings
- Introduce kerbside glass collection

### Councils with the greatest improvement in recycling (2015/16)

↗ 14.7%

Richmondshire

↗ 8.6%

East Riding of Yorkshire

↗ 7.8%

Tameside

### What some of the higher-recycling councils collect

	South Oxfordshire District (household recycling rate of 67% in 2015/16)	North Somerset (household recycling rate of 59% in 2015/16)	South Cambridgeshire (household recycling rate of 57% in 2015/16)
Food Waste Collection	Kerbside	Kerbside	Kerbside
Glass Jars & Bottles	Kerbside	Kerbside	Kerbside
Cartons (e.g. Tetra Paks)	Kerbside	HWRCs	Kerbside
Batteries	Kerbside	HWRCs	Kerbside
Textiles (clothes)	Kerbside	Kerbside	Recycling points
Food Trays	Kerbside	Not Yet	Kerbside
Plastic Bottle Tops	Kerbside	Not Yet	Kerbside

## UKWIN RESPONSE TO THE ESA PARLIAMENTARY BRIEFING ON THE ROLE OF ENERGY FROM WASTE – NOVEMBER 2017

### Resource productivity and waste management

**The ESA states: "...there remains a proportion of waste which is not re-usable or recyclable, known as 'residual waste'".**

A distinction must be made between 'residual waste' which is material that has not been recycled or composted, and 'genuinely residual waste' which is waste that cannot be recycled or composted.

There is already around 17 million tonnes of incineration capacity existing and under construction in the UK to treat residual waste, and there is also other capacity such as waste wood biomass plants and cement kilns that can take some residual waste streams<sup>1</sup>. This capacity is more than enough to deal with the quantities of material that we anticipate will be the available combustible fraction of genuinely residual waste.

The North West of England C&I [commercial and industrial] Waste Survey carried out for the Environment Agency stated that: "...the recorded data suggests that up to 97.5% of the C&I waste landfilled in the region could be recycled if the correct facilities and services were available".<sup>2</sup>

In 2012 Resource Futures Non-executive Chair Phillip Ward noted: "...black bag waste is not a single material. Resource Futures are the holders of comprehensive information about its composition and their study – published by Defra – shows that it is largely made up of regular recyclable materials and much of it is non-combustible".<sup>3</sup>

Tamar Energy noted that: "Of the 40% of residual household waste going to incineration, it is estimated 40% of this is food waste. This runs counter to the waste hierarchy".<sup>4</sup>

South Gloucestershire Council commissioned analysis into their residual waste, which found:

*"A total of 52 percent of the contents of the average black bin could have been recycled in 2014-15 through the existing kerbside recycling service.*

*"A further 10.1 percent could have been recycled through the Sort It recycling centres.*

*"In 2014-15 the council spent over £3m disposing of this recyclable material in the residual waste stream. The majority of this was processed into material used for energy production".<sup>5</sup>*

The aforementioned recyclability surveys are based on what could have been recycled at the time. As we move towards the circular economy the recyclability of products will increase and technologies to sort, recycle and reprocess a wider range of materials will improve.

A review commissioned by RWM in partnership with CIWM noted that: "...increasing recycling from residual waste is likely to remove high calorific value materials from that waste stream, such as paper, plastics, wood etc. This would reduce the calorific value of residual waste over time, potentially changing its suitability for energy recovery".<sup>6</sup>

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<sup>1</sup> <http://tolvik.com/wp-content/uploads/UK-EfW-Statistics-2016-report-Tolvik-June-2017.pdf> and <http://ukwin.org.uk/table/>

<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20130125163914/http://www.defra.gov.uk/statistics/files/ci-project-report.pdf>

<sup>3</sup> <http://www.isonomia.co.uk/?p=1209>

<sup>4</sup> <http://www.tamar-energy.com/news-and-press/press-releases/sustaining-ad-industry-success-needs-a-level-playing-field-says-tamar-energy-chief-executive/>

<sup>5</sup> <http://edocs.southglos.gov.uk/wastestrategyevidence/pages/waste-composition-kerbside/>

<sup>6</sup> "Rubbish Economy" – A Review of Business Waste production in England: Past, Present & Future. Urban Mines, 2011



**The ESA states: "...For this waste, EfW is a much better environmental option than its main alternative, landfill."**

Whilst recycling and composting are clearly better than incineration, it is not true that incineration, especially of plastics and bio-stabilised organics, is better than landfill.

In June 2011 Defra's 'The Economics of Waste and Waste Policy' report concluded that compared to incineration, even incineration with CHP: *"...MBT (mechanical biological treatment)-landfill provides the best emissions performance in terms of the treatment/disposal of residual waste. It essentially involves landfilling somewhat stabilised wastes with some material recovery"*.<sup>7</sup>

In January 2017 Resource Minister Thérèse Coffey stated that: *"My hon. Friend the Member for Rugby referred to energy from waste. I caution against some of what he said. In environmental terms, it is generally better to bury plastic than to burn it"*. The Government Review of Waste Policy in England 2011 notes that: *"...while energy from waste has the potential to deliver carbon and other environmental benefits over sending waste to landfill, energy recovery also produces some greenhouse gas emissions. It is important to consider the relative net carbon impact of these processes, and this will depend on the composition of feedstocks and technologies used"*.

The Government's Energy from Waste Guide explains how: *"Fossil based residual wastes, e.g. plastics and synthetic rubbers that cannot be recycled, do not decompose in the same way as biogenic material in landfill. For these waste streams conventional energy from waste will almost always deliver a negative carbon balance compared to landfill"*.

The Science Advisory Council's Waste Sub-group noted that: *"...Although landfilling tends to be regarded as inherently bad and to be avoided, there is evidence that in some instances...landfill may be the least environmentally, economically or technically unsuitable option. Landfill can also be a way of storing materials that have a potential future value, and other countries already recognise the value of landfill mining"*.<sup>8</sup>

Eunomia's Ann Ballinger stated: *"[if one takes account of relevant environmental impacts] there will be no net climate change benefit over the lifetime of the plant for an incineration facility commencing operation next year [i.e. from 2015] if that facility generates only electricity"*.<sup>9</sup>

Furthermore, whilst both landfill and incineration are undesirable, one can stop sending waste to landfill at any time whereas the substantial cost of an incinerator means there will be a significant 'lock-in' effect as noted in UKWIN's briefing on how incineration harms recycling.

The National Policy Statement for Renewable Energy Infrastructure states: *"CO2 emissions may be a significant adverse impact of biomass/waste combustion plant"*. Environment Agency and SEPA state *"Between 0.7 and 1.7 tonnes of CO2 is generated per tonne of MSW [Municipal Solid Waste] combusted"*, so incinerators are high-carbon and emit millions of tonnes of CO2.<sup>10</sup>

The ESA refers to 'EfW'. Energy from Waste (EfW) includes anaerobic digestion (AD), which is widely recognised as better than incineration for treating food waste. As the Government Waste Review put it: *"...anaerobic digestion offers the greatest environmental benefit, followed by composting"*. Unfortunately, waste incineration capacity and associated long-term feedstock contracts are harmful to AD. ADBA's CEO has referred to the spread of incinerators as a *"really worrying"* threat to the separate collection of food waste for AD<sup>11</sup> and Eunomia noted that: *"...AD sits above incineration in the waste hierarchy, which presents a certain irony as many current local authority residual waste contracts disincentivise food waste collection and AD"*.<sup>12</sup>

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<sup>7</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69500/pb13548-economic-principles-wr110613.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69500/pb13548-economic-principles-wr110613.pdf)

<sup>8</sup> <http://webarchive.nationalarchives.gov.uk/20130702173345/http://www.defra.gov.uk/sac/files/sac-waste-subgroup-finalreport-june-2011.pdf>

<sup>9</sup> <http://www.isonomia.co.uk/?p=2892>

<sup>10</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296988/LIT\\_7757\\_9e97eb.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296988/LIT_7757_9e97eb.pdf)

<sup>11</sup> <http://www.mrw.co.uk/opinion/big-interview/big-interview-charlotte-morton-adba/8629581.article>

<sup>12</sup> <http://www.biogen.co.uk/upload/item/page30/file/Eunomia%20Anaerobic%20Digestion%20Report%20-%20June%202014%20FINAL.pdf>

## EfW and recycling

**The ESA stated: "ESA has commissioned research to estimate how much residual waste treatment capacity the UK will need in future under different scenarios."**

It is not surprising that studies commissioned from those who have a financial stake in incineration will find that what is needed is more incineration. These studies are of general poor quality, and either the assumptions are not stated or are unrealistic, and the data they rely upon is typically out of date. Eunomia's reports are independent and are indeed conservative in their approach, so are more likely to underestimate incineration overcapacity than overstate it.

**The ESA stated that: "unless the UK can achieve very high levels of recycling—more than 65%."**

From the perspective of whether to build incinerators today that will still be with us in 2045, a 65% recycling rate is a low figure to use as the basis of avoiding incineration overcapacity.

As part of the European Commission's Targets Review Project stakeholders were asked to specify *"the highest level of recycling that could reasonably be obtained for each of the listed waste streams by 2025"*. The relevant responses were summarised as follows:<sup>13</sup>

	Household Waste
Industry Trade Bodies	70%
Industry Representatives	70%
Not-for-Profit Organisations	80%
Academic Institutions	70%
Other Organisations	70%
Public Authorities	70%
European Citizens	75%

If a 70% recycling rate for household waste is considered by industry to be achievable by 2025 then a higher rate is clearly achievable within the lifespan of new incinerators which are designed to continue operating until at least 2045.

Some local authorities in England are exceeding 65% recycling in 2015, including South Oxfordshire (67%), East Riding of Yorkshire (66%) and Rochford District Council (66%).

UKWIN has also produced a guide on how local authorities can improve recycling rates which is available at <http://ukwin.org.uk/bin/>

Elsewhere in Europe recycling rates of between 70% and 80% are being achieved. Resource Magazine reported earlier this year that: *"Treviso in Italy, which has over half a million residents, has achieved recycling rates in excess of 80 per cent; meanwhile, the Belgian region of Flanders, an early adopter of variable charging for waste collection, recycles in excess of 72 per cent"*.<sup>14</sup>

Lessons can also be learned from the case studies produced by Zero Waste Europe, which are available from <https://www.zerowasteurope.eu/zw-library/case-studies/>. These highlight the success that can be achieved with ambitious plans for pursuing the circular economy and going for Zero Waste solutions rather waste incineration.

<sup>13</sup> [http://ec.europa.eu/environment/consultations/pdf/Targets\\_Review\\_Project\\_Summary.pdf](http://ec.europa.eu/environment/consultations/pdf/Targets_Review_Project_Summary.pdf)

<sup>14</sup> <http://resource.co/article/what-would-it-take-recycle-80-cent-11899>

**The ESA refers to: "Eunomia's assessment, which assumes the UK can reach 70% recycling..."**

The household recycling rate for England and Northern Ireland in Eunomia's Scenario 1, which is the scenario which UKWIN refers to within our 'Incineration Overcapacity' briefing, is actually based on a 65% recycling rate for 2030 rather than a 70% rate.

Given the 9+ million tonnes of incineration overcapacity Eunomia's forecast identifies there would be overcapacity even with lower recycling rates. Indeed, Eunomia's Scenario 2 estimates 3.4 million tonnes of overcapacity given current committed capacity and a 50% recycling rate.

**The ESA refers to "significant cost that would be involved [in recycling more]" and says that the: "ESA's initial estimates suggest that English councils would need an additional circa £1 billion to push household recycling up to 60%".**

Whatever investment is required in the early stages, recycling can bring significant benefits, e.g. because recycling can generate income for local authorities whereas disposal does not.

Incineration is very expensive. It currently costs around £200m-£250m to build a new incinerator and they are costly to society to operate, not least because some of the costs to society are not reflected in the price paid for incineration.<sup>15</sup>

The ESA figures indicate that the money that would be spent on building four or five incinerators could instead be used to increase England's recycling rate by 15 percentage points if invested in recycling. Such investment would also create far more jobs and would be significantly better for the environment.

Incineration is rendered artificially cheaper due to subsidies and environmental externalities. When one takes into account the environmental impacts then the overall cost of increased recycling is significantly lower than the cost of increased incineration.

**The ESA states: "in the UK EfW plants are financed entirely by the private sector."**

The finance of the vast majority of incinerators is underpinned by long-term waste contracts with local authorities who agree to pay for the incinerator whether they end up needing it or not. This means that it is the local authorities who are taking on the risk that an incinerator will not be needed, not the private sector. This risk transfer is often in the form of 'put or pay' contracts or 'minimum tonnage guarantees'.

In many cases incinerator projects also rely upon PFI funding, direct and indirect Government subsidies, and Contracts for Different guarantees. Merchant gasification projects often rely upon inexperienced investors with little knowledge of the waste industry and the companies involved often go bankrupt.<sup>16</sup>

EFRAOM noted in 2014 that: "When we asked the Minister how the Government ensures that only genuinely residual waste is sent to incinerators, he told us that the key pressure is gate fees - i.e. the charge that must be paid to dispose of waste in an incineration facility. However, we are concerned about the effectiveness of this singular mechanism following evidence we received about 'put or pay contracts' and negative impacts on recycling rates".

In 2014 the Confederation of Paper Industries noted: "In the absence of strategic planning, new regional EfW facilities generate substantial risk [to England's municipal recycling rates]...For those English Unitary and Waste Disposal Authorities entering into long-term residual treatment contracts, underpinned by guaranteed minimum tonnages (GMT), residual treatment overcapacity may well act as a disincentive to increasing recycling rates".<sup>17</sup>

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<sup>15</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69500/pb13548-economic-principles-wr110613.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69500/pb13548-economic-principles-wr110613.pdf)

<sup>16</sup> <http://ukwin.org.uk/fail>

<sup>17</sup> <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/waste-management/written/9485.html>



In 2014 Eunomia noted: *"Incinerator contracts often include a guarantee from the waste disposal authority to supply a minimum tonnage of waste to the facility. Some contracts seek to 'weaken' the strength of this bind by placing a requirement on the contractor to make endeavours to cover any shortfall in the guaranteed minimum tonnage, but in practice, it might be expected that local authorities would still lose money under such arrangements as a result of the underpinning 'put-or-pay' nature of the contract".*<sup>18</sup>

In relation to Nottingham City Council, the Audit Commission previously noted: *"The challenge exercise for recycling and the Council's ability to maximise recycling is limited by the emphasis that has been placed on incineration and the need to maintain guaranteed minimum tonnages of waste to support the operation of the incinerator".*

**The ESA refers to: *"the export of Refuse-Derived Fuel"***

Whilst recycling is better than RDF export, it should be noted that waste currently exported to continental Europe is being exported due to incineration overcapacity in Europe at plants that operate Combined Heat and Power Schemes.

It is likely that if waste were not sent to these plants from the UK then it would have to be procured from elsewhere, potentially resulting in the waste travelling from further distances with increased transport impacts.

As Paragraph 57 of the EfW Guide acknowledges: *"...the overcapacity of energy recovery infrastructure in some EU countries has created a competitive market for this material to be exported".* We should be learning from the lessons of these countries about the dangers of incineration overcapacity rather than trying to exceed their level of overcapacity.

Further reading

**UKWIN has produced a number of relevant documents, including:**

- Four briefings supporting the Early Day Motion calling for a ban on new incinerators:  
<http://ukwin.org.uk/bin/>
- Evidence to the London Assembly Environment Committee:  
[http://ukwin.org.uk/files/pdf/July 2017 UKWIN London Assembly Waste Management Submission.pdf](http://ukwin.org.uk/files/pdf/July%202017%20UKWIN%20London%20Assembly%20Waste%20Management%20Submission.pdf)
- Evidence to EFRACOM:  
<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/waste-management/written/9294.pdf>
- A brief summary of why we oppose waste incineration:  
<http://ukwin.org.uk/oppose-incineration/>
- A table of existing, prevented and potential incinerators:  
<http://ukwin.org.uk/table>

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<sup>18</sup> <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environment-food-and-rural-affairs-committee/waste-management/written/9428.html>



## Caution needed over treatment gap, warns Eunomia

The UK should err on the side of caution in building treatment infrastructure to make sure that recycling ambitions are not jeopardised, consultancy Eunomia said today.

Prompted by a call for more waste treatment infrastructure this morning (30 November) by the Environmental Services Association, Eunomia reiterated its past thoughts that its own estimates are that no further treatment capacity is needed other than already identified.

In its response to the ESA report, Eunomia accepted that the report, 'UK Residual Waste: 2030 Market Review' attempts to resolve the disputes that have arisen over the UK's future need for residual waste treatment.

The consultancy noted: "While this aim is to be welcomed, and the report makes some useful contributions, it risks sowing further confusion. The Review prominently presents scenarios that bear no relation to the current, or likely future, reality."

And, Eunomia claims that "By excluding RDF exports and additional EfW capacity from some of its headline results, it ignores 4.5 million tonnes (mt) of capacity that the report itself identifies. Taking this into account would significantly alter the report's findings."

Reasoning that the report has over-estimated the capacity gap by 5.8mt it said "this is because it under-estimates current known treatment capacity and overstates likely future waste arisings, by failing to take account of:

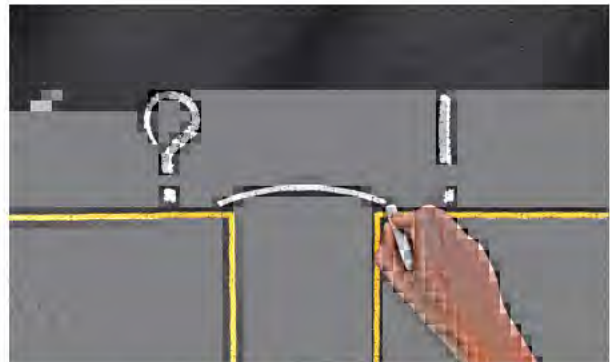
- 1.8mt of net capacity provided by MBT
- 2mt of waste that is likely still to be landfilled in the future
- 1mt of potentially lower waste arisings
- 1mt of likely RDF exports, above the 2.5mt allowed for in the review, taking the total to the current level of 3.5mt per annum."

In a statement, Eunomia argued: "The combined effect of these unrealistic assumptions is to reduce the headline capacity gap by some 10mt, meaning that in all but the 'do nothing' scenario, where recycling rates remain broadly at their current level, there would be no need for further treatment capacity. This would be broadly in line with Eunomia's position."

### Bullish

Eunomia principal consultant Peter Jones said: "Whilst this report has clearly tried to take on board a wide range of views, it has done little to resolve the debate in this area. Instead, it takes an unrealistically bullish approach to many of the key assumptions. It therefore significantly overstates the UK's need for residual waste treatment infrastructure, thereby risking the building of more costly infrastructure than we need."

"In planning for residual waste treatment, we should – if anything – err on the side of caution so as not to limit our recycling ambitions today and those that we might develop in the future."



Eunomia's estimate of the treatment gap differs from the ESA (picture: shutterstock)



Peter Jones of Eunomia who spoke of a need to 'err on the side of caution'

## **UKWIN's December 2017 critique of 'Cory Riverside Energy: A Carbon Case'**

1. UKWIN has undertaken an initial critique of the 'Cory Riverside Energy: A Carbon Case' report to explain some of the errors contained within the report which, when corrected, demonstrates that the greenhouse gas emissions from Cory's Riverside incinerator are in fact significantly higher (between 6.7m and 10.5m tonnes higher over 30 years) than emissions from sending the same waste directly to landfill.
2. Alongside a consideration of the 'Cory Riverside Energy: A Carbon Case' report, UKWIN has drawn on the following relevant source documents:
  - Defra's 'Energy recovery for residual waste: A carbon based modelling approach February 2014' (Defra 2014), as this document is cited by Cory as a source document for their report;
  - BEIS's 'Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal' (last updated March 2017), as this is the most relevant BEIS guidelines as referred to in the Government's Energy from Waste Guide as appropriate for such analysis; and
  - Eunomia's 'The Potential Contribution of Waste Management to a Low Carbon Economy' (Eunomia 2015), as this provides evidence-based best practice guidelines to be used when accounting for the emission of biogenic CO<sub>2</sub> in comparative analysis between incineration and landfill.

### **Biogenic CO<sub>2</sub> emissions**

3. Section 6.3 of the Defra 2014 report, which the Cory report cites as one of its primary data sources, notes that:

*"...the model assumes that not all of the biogenic material decomposes in landfill but it is all converted to CO<sub>2</sub> in energy from waste. Landfill therefore acts as a partial carbon sink for the biogenic carbon. This is a potential additional benefit for landfill over energy from waste.*

*There are two ways to account for this additional effect:*

- *[Option 1:] Estimate the amount of biogenic carbon sequestered and include the CO<sub>2</sub> produced from the same amount of carbon in the EfW side of the model (or subtract it from the landfill side)*
  - *[Option 2:] Include all carbon emissions, both biogenic and fossil on both sides of the model"*
4. Cory's carbon analysis fails to account for this additional effect, applying neither Option 1 nor Option 2. UKWIN has used Option 2 for our analysis, but the choice between Options 1 and 2 to account for the difference in biogenic release of CO<sub>2</sub> between landfill and incineration does not affect the conclusion that, in terms of CO<sub>2</sub> emissions, incineration is worse than landfill.

5. Eunomia's 'Low Carbon Economy' report noted that it was essential that biogenic carbon in CO<sub>2</sub> is taken into account. Cory's report fails to follow best practice in this respect.
6. The Eunomia report stated that: *"In comparative assessments between waste management processes, it cannot be considered valid to ignore biogenic CO<sub>2</sub> emissions if the different processes deal with biogenic CO<sub>2</sub> in different ways..."*
7. As such, by ignoring biogenic CO<sub>2</sub> emissions from incineration while failing to adequately credit landfill for sequestration of carbon, Cory has adopted an approach which is not valid and therefore needs correcting to account for the relative net CO<sub>2</sub> impact of incineration compared with landfill.

### **Offset energy from incineration**

8. Defra 2014 states:

*"The thermal efficiency of a power-only EfW is defined as power exported to grid / energy content of the waste × 100%" (Para 216)*

*"Energy (EfW) = mass of waste x calorific value x efficiency" (Para 61)*

9. This supports the common sense approach, which is to base the marginal energy generation offset on the electricity exported rather than giving credit for the 'parasitic load' needed to operate the plant.
10. Inexplicably, Cory's carbon report mistakenly uses the gross figure of energy generated, rather than the net figure of energy exported. This error therefore also needs to be corrected.

### **Carbon intensity of displaced energy source / marginal emissions factor (MEF)**

11. A further error in Cory's report is to use an outdated CCGT figure of 0.385 tCO<sub>2</sub>/MWh to calculate the carbon intensity of the displaced energy source.
12. UKWIN notes that the highest value in the Defra 2014 range for carbon intensity of displaced energy sources is 0.373 tCO<sub>2</sub>/MWh, and that the official BEIS 2011 emissions factor, i.e. the MEF for the first year of operation for the Riverside incinerator, of 0.336 tCO<sub>2</sub>/MWh is in fact the correct marginal emissions factor (MEF) to use for these purposes. It should also be noted that were we considering a facility starting operations in 2018 then, due to decarbonisation of the electricity supply, the correct MEF would be 0.280 tCO<sub>2</sub>/MWh.
13. As explained at Paragraph 119 of the Defra 2014 document used by Cory: *"...we should use the marginal energy mix which represents the carbon intensity of generating an additional kW of electricity...as renewable energy and nuclear make a greater contribution to the marginal energy mix this will change and the result will be a significant drop in the carbon intensity of the marginal energy mix".*

14. The February 2014 Defra Energy from Waste Guide noted: *"When conducting more detailed assessments the energy offset should be calculated in line with DECC guidance using the appropriate marginal energy factor"*. This is now BEIS guidance, which UKWIN has followed in our Further Corrected Cory Scenario. The Partially Corrected Cory Scenario analysis still uses the outdated 0.385 figure for the purpose of sensitivity analysis.

#### **Proportion of methane captured / Landfill gas capture rate**

15. Cory refers to the Defra 2014 document as a primary guidance document, yet Cory uses a 66% landfill gas capture rate in preference to the 75% rate. The 75% rate is based on Government practice and is adopted as the baseline figure in the Defra 2014 document.

16. UKWIN uses the 75% figure for the landfill gas capture rate in our Further Corrected Cory Scenario, whereas the Partially Corrected Cory Scenario analysis uses the 66% figure for the purpose of sensitivity analysis.

**Table 1: Scenario Outline**

	<b>Defra 2014 Baseline Scenario</b>	<b>Cory Choice</b>	<b>Partially Corrected Cory Scenario</b>	<b>Further Corrected Cory Scenario</b>
<b>Biogenic CO2 emissions</b>	Considered in Section 6.3 of Defra 2014	Not accounted for by Cory	Follows Defra 2014 Option 2	Follows Defra 2014 Option 2
<b>Offset energy from incineration</b>	Considered at paragraph 61 and 216	Use total power generated	Total power generated	Total power exported
<b>Carbon intensity of displaced energy source / marginal emissions factor (MEF)</b>	0.373  (Highest value of Defra 2014 range)	0.385  (Higher than all of the Defra 2014 range)	0.385  (Cory figure)	0.336  (BEIS 2011 emissions factor <sup>1</sup> ; within Defra 2014 range)
<b>Proportion of methane captured / Landfill gas capture rate</b>	75%  (Based on Government practice)	66%  (Lower than Defra Baseline Scenario)	66%  (Cory figure)	75%  (Defra 2014 Baseline Figure)

<sup>1</sup> Latest BEIS figure for 2011 generation-based electricity emissions factor as per Table 1 of the Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal - last updated 15 March 2017; within Defra 2014 range and used per guidance in Defra's Guide to Energy from Waste



17. When comparing the greenhouse gas emissions from the Riverside incinerator with sending the same waste to landfill we can see, from the tables below, that even taking account of the benefits in carbon saved by using transport by water instead of road, Cory's incinerator still emits significantly more CO<sub>2</sub>e than sending the same waste to landfill.
18. Based on the assumptions in the Cory and Defra reports and by BEIS, over a 30 year period sending the waste to the Riverside incinerator would result in between 6.7 million and 10.5 million tonnes of CO<sub>2</sub>e being released compared to sending that same waste directly to landfill. This means the Riverside facility is exacerbating climate change and should be considered a 'high carbon' facility.

**Table 2: Partially Corrected Cory Central Scenario (tCO<sub>2</sub>e)**

	Transfer stations	Transport	Process	Displaced electricity emissions	Total tCO <sub>2</sub> e
Cory Riverside Energy	4,160	5,163	693,137 [a]	-221,979	480,481
UK Landfill		18,642	260,111	-24,530	254,223
Net Carbon saving (CO <sub>2</sub> e) per year	-4,160	13,478	-433,026	130,470	-226,258
<b>Net Carbon saving (tCO<sub>2</sub>e) over 30 years</b>					<b>-6,787,740</b>

**Notes:**

(Grey Cell) = Figure directly from Cory Table 11

[a] 693,137 = 700,138 tonnes of waste (Cory page Table 9) x 27% total carbon percentage (Cory Table 9) x 44/12 Carbon to CO<sub>2</sub> (Cory Table 5) [Calculates total CO<sub>2</sub> - Correcting for Cory having used just fossil-based CO<sub>2</sub> and failing to account for the biogenic carbon emitted]

**Table 3: Further Corrected Cory Central Scenario (tCO<sub>2</sub>e)**

	Transfer stations	Transport	Process	Displaced electricity emissions	Total tCO <sub>2</sub> e
Cory Riverside Energy	4,160	5,163	693,137 [a]	-173,096 [b]	529,364
UK Landfill		18,642	183,608 [c]	-24,328 [d]	177,922
Net Carbon saving (CO <sub>2</sub> e) per year	-4,160	13,478	-509,529	130,470	-351,442
<b>Net Carbon saving (tCO<sub>2</sub>e) over 30 years</b>					<b>-10,543,267</b>

[a] 693,137 = Corrected as per Table 2 notes above

[b] -173,096 = 515,166 MWh exported (Cory Table 6) x 0.336 MEF (BEIS long-run generation-based marginal emissions factor 2011) [Corrected to account parasitic load]

[c] 183,608 = 75% landfill gas capture based on Cory Table 9 methodology [Corrected to take account of Government use of 75% landfill gas capture, and not Cory's figure of 66%]

[d] -24,328 = 72,404 MWh (adjusted from Cory Table 10 to account for 75% methane capture) x 0.336 MEF (BEIS long-run generation-based marginal emissions factor 2011) [Corrected to take account of BEIS MEF for 2011 and Government 75% landfill capture]

## **CO2 benefits of alternative waste treatment methods**

19. The above analysis is only comparing the proposed waste incinerator at Riverside with sending waste directly to landfill. In reality, the waste could be sent to MBT prior to landfill, which would result in a high degree of bio-stabilisation that would significantly reduce the methane released from landfill and this would therefore further improve the position of landfill compared with incineration.
20. Furthermore, the composition analysis provided by Cory indicates that a significant proportion of the waste could potentially be separately collected for recycling or composting.
21. Table 4 of the Cory report indicates that much of the material used as feedstock by the Riverside incinerator in 2015 could have been recycled or composted. For example:
  - About 28% of the feedstock (by weight) was paper and card
  - About 26% was putrescible (compostable material)
  - Just over 16% was plastic film or dense plastic
  - More than 7% was either glass or metal
  - About 3.5% was textiles
22. Based on the Scottish Government's Zero Waste Scotland Carbon Metric, recycling just 50% of the plastic used as feedstock for the Riverside incinerator in 2015 would have resulted in a carbon saving of 53,291 tonnes of CO<sub>2</sub>e per year, and recycling 50% of the paper and card would result in carbon savings of 30,718 tonnes of CO<sub>2</sub>e per year.
23. For other materials there are also significant carbon savings that could have been made had the focus been on recycling and composting rather than incineration. Even greater carbon savings could have been achieved if there had been a greater focus on waste minimisation.

# Langhurstwood Road Residents Group

Abbotslea  
Langhurstwood Road  
HORSHAM  
West Sussex  
RH12 4TL

Phone [REDACTED]

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

30 April 2018

Dear Mr Dumbrell

## **Britaniacrest Recycling Ltd - Application WSCC/015/18/NH**

We are resolutely AGAINST this application from Britaniacrest and remain consistent with our objections over recent years to WSCC/018/14/NH, WSCC/021/15/NH, WSCC/062/16/NH.

During the early years after the millennium we opposed incineration for the disposal of waste and as members of HALT [Horsham Anti-incineration Linked Taskforce] helped to persuade West Sussex County Council [WSCC] to abandon any consideration of incineration and adopt a proper recycling solution. This resulted in the facilities built at Ford, operated by Viridor and Brookhurstwood, Horsham [MBT/AD] operated by Biffa in conjunction with WSCC. These facilities process all of WSCC's municipal waste, together with some waste streams from the Amenity waste disposal units.

The point we wish to make is that WSCC considered, at the time, that incineration was outside the waste treatment hierarchy they wished to be part of, so "what has changed". Britaniacrest [BCR] continually quote "but West Sussex doesn't have an Incinerator". So what, just because we do not have one doesn't mean we should have one, and anyway the Horsham area is doing more than their bit, with the location of the Biffa/WSCC MBT/AD plant taking in up to 243,000 tones municipal waste pa.

Incinerators are NOT sources of renewable energy. Renewable energy comes from wind farms, sunlight, water, tides, waves and geothermal heat.

We are founder members of the main local opposition group "No Incinerator for Horsham [Ni4H]" and as such are fully aware of, and in complete support of the official response from this group. We therefore consider it un-necessary to repeat chapter and verse of this response, but to highlight a number of areas.



The proposed utilitarian, industrial designed building and its bulk and height, together with the 95m chimney height, does not relate sympathetically with the existing and proposed built surroundings, landscape, open space, and in particular its impact on the skyline and important views for current and future residents of North Horsham, and afar. Although there have been marginal changes to the unsupported [by WSCC] application of last year [WSCC/062/16/NH], the amendments do not resolve fundamental issues. The proposal should FAIL against criteria described under Policies W11 and W12.

We contend that the BCR proposal is NOT "Recovery" [R1] as defined under the European Waste Framework Directive 2008/98/EC, BUT "Disposal" [D10]. Although there is the intention to generate power, there is no evidence provided for the utilisation of waste heat emanating from the incineration process. Such would make the operation c 25% efficient and not 65% efficient as defined for R1. Simply to state that the facility has the potential for use of waste heat is not enough, and means little. We therefore contend that this application is no more than D10 "Disposal of Waste by incineration on land" and barely up the waste hierarchy to landfill. A D10 categorisation would engender a proximity principle that waste can only be sourced from the local area, whereas it is the BCR intention to draw in waste from wherever it is economic to do so, and therefore a wide area across county lines. There is case law, and rather local case law on this issue.

We consider that this proposal is not acceptable with regards to highway capacity and road safety. It is our view that WSCC/18/14/NH which permitted 246 HGV movements per weekday, only to be increased to 284 HGV movements per weekday under WSCC/021/15/NH, as far too excessive. These allowances need to be considered alongside the 392 HGV movements per weekday permitted under the Biffa MBT/AD authorisation.

As wrong as these HGV allowances were at the time, much has changed since and much more change is planned in the future, particularly the Liberty development of North Horsham with up to 2750 homes, business park, schools and more.

BCR state that they are not looking for increased HGV movements over and above their current permissions, BUT until this time BCR are only utilising 37% [averaged monthly over the past 12 months up to Feb '18] of their 284 HGV movements per day. Therefore an incinerator will massively increase the realistic level of HGV movements witnessed to this time.

Surely, it is time for another up to date review be commissioned, allowing for all these changes rather than dependance on information which is more than 5 years out of date.

Notwithstanding our comments on HGV movements, over the past 12 months there has been fresh concerns on vehicle pollution, especially diesel engined. This local area is already greatly polluted, and these HGV movements together with the cumulative emissions to air from a brickworks, the MBT/AD waste operation, landfill, and now potentially an incinerator is just a step far too far. The health of current and future residents must be at risk, and such should weigh heavily on the consciences of decision makers.

We are aware that all operations that emit emissions to air are regulated and need to conform with legislation, BUT all permits allow a level of pollution beyond which the controls set in. Therefore even when in compliance there are pollutants such as Co2, NOX, particulates in concentrations up to at least the base level permitted. The point being made is that new emissions start well above the zero baseline and simply add to the existing. It also has to be said that compliance is a virtue of the maintenance and

condition of any application, and the degree to which regulation is monitored. Shouldn't we all be concerned?

The issue of Noise has been inadequately addressed, nor has the matter of Smell. Both are regularly experienced from the existing operations on the Brookhurstwood site, and yet mitigations fail, and fail on a regular basis, and require dialogue with the Operators and the EA. The applicant has failed to demonstrate that noise from the operation would not have a significant adverse impact on current and future residents.

There has been considerable press coverage of late that the Nation is heading for too much incinerator capacity, when considering those in operation together with those being constructed. This is already the case for some continental European Countries where it is necessary to import [from the UK etc] waste to satisfy their insatiable appetites. Once built, and at such great cost, only means that incinerators have to operate at capacity and for a life of 25/40 years. This will put at risk the recycling and reuse objectives and mean the ever increasing need for the basic mineral resources, which themselves are scarce and dwindling. Once burnt, only ash remains.

The application last year {WSSC/062/16/NH} was withdrawn prior to Planning Committee, because there was a recommendation from the Officers of refusal. This new application exhibits little to no change, and the amendments offered do not resolve the fundamental issues.

This is the wrong technology, and in the wrong place. The footprint of land ownership by the applicant is too small to shoehorn in such an industrial monolith without any consideration for the space between other facilities on the overall site, and all of this in a rural area, adjacent to a major housing development and using a road network which is totally inadequate.

We call for a rejection of this application.

Yours sincerely

Brian Johnson - for Langhurstwood Road Residents Group [LHWRRG]

Durfold  
Dorking Road  
Warnham  
Horsham  
West Sussex  
RH12 3RY

West Sussex County Council  
County Hall  
Chichester  
PO19 1RH

3 May 2018

**By email only**

Dear Sirs

**Re: Horsham Incinerator**  
**Your Ref: WSCC/015/18/NH**

I am writing to you to object to the incinerator planned for Horsham.

The idea of building an incinerator close to Horsham has been rejected on a number of occasions. Firstly in the early 2000s and more recently last year. As a consequence of the earlier rejection, consent was given for an MBT facility at the Brookhurstwood site which has been constructed. For the most part, I understand that facility is regarded as a success and has provided the county of West Sussex with a recycling waste processing facility dealing with around 300,000 tons of waste per annum.

Incineration, of course, does not facilitate future recycling and once it has taken place, the possibility of future regeneration is lost forever. I would therefore have expected the emphasis from the County Council to be on recycling rather than incineration in the waste plan for the county.

The bulk and mass of the proposed plant is huge but is dwarfed by the stack which I understand will be some 90 metres tall, equivalent I believe to twice the height of Nelson's Column. Whilst images have been precluded to suggest the building will not be visible from various vantage points, the stack will be hugely visible to anybody looking across that part of the countryside and from further afield, such as looking south from the North Downs.

It is the stack, therefore, which highlights my greatest concern, both from its impact on the countryside and also the implication of its size which will allegedly disburse the emissions generated by the proposed plant.

It must be obvious that a stack of such great height to allegedly disburse the emissions indicates that the emissions themselves are of an unacceptable level. Simply presenting the argument that the residual emissions within the vicinity of the plant are de minimis speaks to the very serious concern about the environmental impact.

If the proposed incinerator is approved, there will be a severe impact on the road network in the northern part of Horsham as the material for incineration will have to be brought in by heavy goods vehicles, already exacerbating the number of vehicle movements caused by the brickworks and MBT plant in Langhurstwood Road.

In conclusion, I urge you to reject this planning application and instead work towards increasing recycling within the county of West Sussex.

Yours sincerely

A large black rectangular box redacting the signature of Stuart Ritchie.

Stuart Ritchie

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**From:** Karen Park [REDACTED]  
**Sent:** 03 May 2018 22:21  
**To:** PL Planning Applications  
**Cc:** Richard Park  
**Subject:** Objection to Planning Application WSCC/015/18/ NH

### **3.5.18 Objection to Planning Application WSCC/015/18/ NH**

I wish to object to the planning application by Britaniacrest Recycling Ltd for a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure, at the former Wealden Brickworks in Langhurstwood Road, Horsham, West Sussex, RH12 4QD.

Why do we need an incinerator in Horsham, when more emphasis should be given to re-cycling!

The argument that it produces electricity, is a poor one it will only produce around 21 megawatts of electricity per year of which approximately 18 megawatts would not be used by the facility, which in comparison is less than that of 4 wind turbines. However, the plans do not include how that would be connected to the National Grid or who would pay for that!

It will damage the landscape, add pollutants into the atmosphere and send out the message that Horsham is simply a convenient dumping ground for the surrounding counties.

This planning application does not comply with West Sussex County Council's Waste Local Plan.

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.**

**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 Britaniacrest proposal does not meet the criteria set out above.

It's time the Horsham District & West Sussex County Council listens to their residents, rather than blindly pursuing their own agendas.

Richard Park  
2 Chaffinch Close  
Horsham  
West Sussex  
RH12 5HA

## **Objection to Planning Application WSCC/015/18/ NH**

**Britaniacrest Recycling Ltd - 3<sup>rd</sup> May 2018**

I wish to register the strongest possible objection to the planning application by Britaniacrest Recycling Ltd for a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure, at the former Wealden Brickworks in Langhurstwood Road, Horsham, West Sussex, RH12 4QD.

I am a paediatric nurse, general nurse and health visitor. I attended Britaniacrest's Public Exhibition on 8.10.16 and North Horsham Parish Council's Public Meeting on 20.4.18. I have spent many hours reading documents, reports, objections and talking to people to inform myself about this issue.

I live in Holbrook, 1.4 km, 0.8 mile from the site. We are already affected by smells from existing operations at that site, increasing levels of noise and pollution from HGV and other traffic and aeroplanes. The 95m stack and the enormous plume will be visible from our garden and road. This will be a constant reminder of the risks of living so near it and will devalue our property, which currently has rural, residential views. We were considering moving to the new North Horsham Development, but now like many others will seriously consider moving out of the Horsham area, if this planning application is approved.

**Little has changed** regarding our objections to the previous application which was withdrawn: WSCC/062/16/NH. I am very concerned that many people think that their objections to the previous application still stand and hence have not objected to the revised proposal. There has been a distinct lack of information from the both developer, District and County Councils.

It is so close to existing housing and businesses in North Horsham, Warnham and Rusper, to Warnham Station and the new Liberty Property Trust housing development.

### **Pollution**

A friend was told by a Britaniacrest expert at their Public Exhibition that inhaler users would just need to use their inhalers more often, that is totally unacceptable. I was told that the HGV diesel pollution is a great health concern. I know a number of people who already have severe breathing difficulties with the current levels of pollution, they often end up in hospital. I fear that they would no longer be able to live or work here.

The **incombination pollution** from the adjacent landfill, Brickworks, BIFFA works, HGV and other traffic on the busy A264 and A24 and aeroplanes from nearby Gatwick, all need to be considered, not just predicted data from the incomplete plans for this incinerator.

WSCC has decided to have traffic lights and alterations to roundabouts on the A264 from Kilnwood Vale to Southwater, and reduce speed limits to 50mph, this will slow down the traffic and it will be waiting at the signals, increasing the non-green impact of HGVs and other vehicles.

This commercial proposal will take in commercial and industrial waste from around West Sussex and neighbouring counties, recycle some of it and burn the rest. There is no benefit to local residents or WSCC, and no guarantees that it will be cheaper than what is currently paid to export the waste which is incinerated in Germany.

**The WSCC Waste Local Plan 2014** states that: *"Planning applications much be determined in accordance with the statutory development plan unless material considerations indicate otherwise."*

The development is not compliant with the planning policies of the West Sussex Local Plan 2014, Horsham District Planning Framework 2015, National Planning Policy Frameworks and National Planning Policy for Waste and the strategic objectives / policies within. Other objectors have documented and referenced these in great detail including North Horsham Parish Council, Liberty

Property Trust, The Council for the Preservation of Rural England, UKWIN, Warnham Reserve and No incinerator for Horsham.

The Land North of Horsham planning permission has been given to build up to 2,750 homes in the adjacent area with the Section 106 awarded. The 6-week Judicial Review period has come to an end without being challenge by Britaniacrest or anyone else. There are a number of material considerations for WSCC to take into account which should lead them to refuse the planning application.

The application does not comply with West Sussex Waste Local Plan 2014 including the following:

The proposal size is excessively large and high and will have a major impact on Horsham, surrounding area and Surrey areas of outstanding natural beauty.

**Strategic Objective 5:**

*To make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.*

Commercial and industrial waste would be transferred long distances from West Sussex and other counties to feed a very large incinerator. We already have a Mechanical & Biological Treatment plant in Horsham, on the site adjacent to the proposed incinerator. West Sussex County Council and the taxpayers of West Sussex made a significant investment in this MBT facility and WSCC has been very successful leading the way in recycling. WSCC is only responsible for municipal waste.

Members of the European Parliament voted on the EU's Circular Economy Package to take another step towards a truly sustainable European economy. It is estimated that for every 10,000 tons of waste, 36 jobs can be created if it is recycled, and up to 296 if it is reused, compared to one job in case of incineration or six jobs in case of landfill. <https://www.greens-efa.eu/files/doc/docs/6706d1f76fbd7dafb124f5f9ce88d7dc.pdf>

A paper released last year by the European Commission (The Role of Waste-to-Energy in the Circular Economy, 26.01.2017) warned that incineration would hamper the circular waste economy. They recommend investment in more recycling capacity and anaerobic digestion instead.

**Strategic Objective 8**

*Proposals for waste development will only be permitted if they do not have an unacceptable impact on the character, distinctiveness and sense of place of the different areas of the County. Proposal should retain important characteristics and features and where possible development should reinforce the main natural character areas.*

The proposed site is a rural area despite the operations that already take place there. The development is considerably higher than the existing buildings, well above the tree line.

**Strategic Objective 10**

*To protect and, where possible, enhance the natural and historic environment and resources of the County.*

I cannot find anything about the proposals which would enhance the natural environment. It will detract and blight being visible from 15kms away in rural areas including areas of Outstanding Natural Beauty.

**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...*

The proposal will have a dramatic effect on the character of the rural village of Warnham, surrounding rural communities, Horsham and on the North Horsham Development, so it does not meet the criteria.



**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 incinerator does not meet this requirement as the applicant states waste will be sourced from outside of WSCC to keep the commercial incinerator burning 24/7.

**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.*

It will harm the health and amenity of existing and proposed local residents, businesses and visitors. The emissions will include lead, mercury, dioxins and cadmium. The increase in road traffic and the impact it will have on business and social travel in delays and detrimental impact on Horsham as a whole.

**Policy W21: Cumulative Impacts**

*Notes that development will be permitted only where the proposed development combined with other existing/ planned developments do not result in an unreasonable level of disturbance to the local environment. Phasing agreements may be sought to minimise adverse impacts.*

The intensification of use on this site for waste management facilities will result in an unreasonable level of disturbance to the environment and the local community, including the new residents of the North of Horsham, during construction and subsequent operation of the site, with increased noise, dust and other pollution and diesel fumes from HGV's.

**Visual Impact**

The stack of the brickworks is 26.5m high. The proposed incinerator building will be taller than this at 35.92m. The stack will be 95m tall and visible from 15km away with plumes ranging from 6m to over 400m coming from the top. The total impact of the buildings cannot be hidden by any trees or landscaping and will be seen from as far away as Box Hill. Any planting to hide the car park and other low-level features will take years to fully mature. It will be totally overpowering and intrusive day and night. The design of the stack is not complete, there could even be two stacks which similar incinerators have, this would have an even greater visual impact.

**Light Pollution**

Permanently illuminated steady red obstacle lights are demanded by the CAA on the middle and top of the 95m high stack, lighting it up like a giant Christmas tree and the four highest corners of the enormous building will also be lit, to avoid endangering the safe movement of air traffic. These and other lights on sight will produce significant increase in light pollution in this rural area. We need to bear in mind how low planes fly over nearby Rusper.

**Noise Pollution**

Operating 24/7 the site will create noise above the ambient noise enjoyed by rural areas of 30-35 decibels. This will have a significant adverse impact on residents and is therefore contrary to Policies W10 and W19 of the West Sussex Waste Local Plan; policy 24 of the Horsham District Planning Framework (2015) and paragraph 123 of the National Planning Framework (2012). Ambient noise levels decrease at night but Britaniacrest have admitted that they are struggling to reduce the noise to a level compatible with a rural location.

## **Odour and Dust Pollution**

Those who live close to the site are already affected daily by dust, odours and litter from the current HGV movements, road sweepers and cumulative effect of all the current operations on that site. That will increase as Britaniacrest are only currently using 43% of lorries that they are permitted to use daily, so a 57% increase is allowable without seeking any further permission.

## **Recycling**

WSCC have shown 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 and Wales. Government is already beginning to consider compelling evidence that there is overcapacity of waste incineration in the UK. In the EU they have to import waste in order to feed their incinerators.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers' money.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

**WHO advises that areas near a waste incinerator should not be populated**, but this incinerator would be next to existing housing, the new North Horsham development, and three new schools, as well as the existing nursery schools and businesses will be affected as the plume will also head over nearby towns and we do not know where the harmful residue and nanoparticles from it will fall as well as the gases.

If the proposal goes ahead with resultant and cumulative pollution, land contamination, and reduction of air quality. The applicant has not provided adequate evidence to support no impact to human health and the Carbon Assessment appears to be flawed.

**Potential impacts of incinerator traffic** sought in advance under previous planning applications WSCC/018/14/NH and WSCC/021/15/NH - this level of traffic has not yet been achieved so any data used in the application is not accurate. The changes now approved as part of North Horsham have not been taken into account - of most note the changes to access to Langhurstwood Road. Sustainable methods of transport are not being used even though Warnham Station is adjacent.

**Inadequate public consultation** of local residents, including input into the design and sharing of the Environmental Statement. For such a large impactful development such as this, greater promotion/exhibition space and timing of such should have been reflective of the population affected. The two exhibitions were poorly promoted with insufficient notice.

**Impact of Wake Vortices from aircraft movements** on the dispersal of pollutants/plume behaviour in the local vicinity of the proposed incinerator has not been adequately assessed. These can result in driving the dangerous emissions back down to ground level and thus undoing the primary purpose of the excessively tall stack and emission treatment technologies. Consideration of the consequences of wake vortices should also consider future changes to flight paths, increase in aircraft traffic and changes in Government policy in expanding Gatwick Airport.

## **Increased risk of fire and resultant health risks**

The incinerator and the use of flammable materials to operate it will increase the risk of fire to the location. There is insufficient information on what the impact could be to the local community if a fire

were to break out, especially bearing in mind the businesses in operation on adjacent sites, the MBT, brickworks, landfill, and areas of ancient woodland. This cumulative risk is not addressed.

**REDUCE the amount of waste we produce and RECYCLE more**, this is better than destruction by burning. In West Sussex we have supported this initiative for many years, which is why we rejected previous plans to build an incinerator and built an MBT plant instead, years ahead of the EU conclusion that this was preferable technology to incineration.

**The fine particulate matter in emissions (PM2.5)** is associated in many studies with cancer. I have already had treatment for cancer as have a number of my neighbours who live in North Horsham, it would be very interesting to know if cancer rates are already higher in this area from the pollution we are already affected by.

**The current 'safe' level for dioxin emissions** is based on limited studies that have shown the level at which there is no obvious and immediate harm to fully grown adults. What about the effects preconception, on unborn babies, our children and long-term impacts to health? Where is the evidence that these are safe?

### **Electricity**

The claim about the benefit of the electricity production is largely a red herring, it is disappointing to see that despite the developer's publicity regarding electricity there are no proposals other than to use approximately 3 megawatts by the facility itself. They are expecting others to provide the plans and connections to the National Grid or elsewhere for the remaining 18 megawatts per annum. That all should have been an integral part of the design plans from the outset.

How will the rest of that energy be dissipated or will it just contribute to global warming?

### **Further Information**

I am very concerned about the extent of missing and inaccurate data and misleading information repeatedly highlighted by the comments of experts on Britaniacrest's proposals, so it cannot be assumed that the proposed facility represents an improvement over landfill.

The applicant's proposed 'worst case' scenarios could be significantly underestimating the potential permitted emissions from the plant, and there is always a risk of accidental spillage / fumes of dangerous chemicals, so it should not be built so close to other businesses or residents.

It is near Warnham Nature Reserve and in the valley of the Boldings Brook stream that feeds the reserve and then goes on to run around and through Horsham. This key local amenity is used by large numbers of Horsham residents, dogs and wildlife and putting this stream at risk is unacceptable.

Even if the effect on health can be mitigated, the fear of health impact can be a material consideration. These matters, both individually and in combination with other sources of pollution such as aircraft and traffic movements, need to be analysed together.

The development should not be allowed to proceed unless both the EA and WSCC are able to demonstrate that the health concerns can be overcome; and that it is clear how monitoring and enforcement of emission standards will be conducted independently of the operator.

Waste to feed the incinerator will be transported across county borders polluting the air we breathe with Co2 and Nox, damaging our health and the environment.

Recent developments are already leading to reduction in use of plastics and packaging and more recycling. Plastic can now be broken down into enzymes and can be recycled to repair roads, create board walks etc.

Significant harm would be caused by the proposed development, I cannot find any evidence of benefit to the current and future local community or future generations.

## **Not necessary**

West Sussex County Council granted permission for an incinerator at Ford in 2014 that is yet to be built.

**CPRE Sussex is demanding a full investigation** into how and where the pollutants emitted by the facility, individually, collectively, and cumulatively over time, could or would impact on farmland, livestock, the natural environment and reservoirs.

**CPRE are hosting a Public Meeting**, but unfortunately this will be after the deadline for comment on this planning application. I hope County Councillors will attend and hear for themselves the various points of views discussed.

**Why were Britaniacrest allowed to make a presentation** to the council in addition to all the documents submitted as part of the planning application but No incinerator for Horsham, which represents local residents, has not been allowed to make a presentation?

**Currently Britaniacrest are only using 43% of permitted HGV traffic**, so without needing to apply for an increase in the level of permitted traffic, they will have 57% more HGV traffic to and from the site.

It is a commercial venture which could be sited anywhere. Waste from all over the country and maybe even from Europe. Our roads and infrastructure in a rural aspect cannot cope, they currently clog up every day.

**We do not know who the builder or operator will be or their track record for safety** and consideration of the local community during construction and operation.

**This proposal by a private developer is purely for profit.** Who is the legal owner of the land? Who are the investors behind Britaniacrest who have been waiting 10 years to spend 150 million pounds expecting to make a profit at our expense? Is there any conflict of interest with those who were elected to represent the people they serve, who will be making decisions which will affect so many lives in this area and beyond?

**Accurate figures are needed for WSCC** to be able to assess the potential impact on health from emissions from the stack during the operation or as a result of an on-site fire. The North Horsham development includes primary and secondary schools, and it has been proven that **young children are especially vulnerable to air pollution**. This is contrary to WSWLP policy 19.

**The proposed road re-routing through the new Liberty residential estate** is totally unsatisfactory in terms of health, safety and disturbance to a normal lifestyle.

Inevitably, emissions from this facility would have serious detrimental effect on the current population and the future population in the development planned in North Horsham. Relatively small quantities of toxins cause permanent injury to humans, wildlife and the environment which is irreparable.

## **Contact Details**

Mrs Karen Park  
2 Chaffinch Close  
Horsham  
West Sussex  
RH12 5HA

**Application WSCC/015/18/NH proposed by Britaniacrest Recycling Ltd (BCR) at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex RH12 4QD**

On this day in history, two men called de Grandpré and le Pique fought a duel over Paris from balloons in 1808. Le Pique's balloon was shot and he died in the crash.

I strongly **object** to the Planning Application and request that the application be **refused permission** because of its adverse effects, which cannot be dealt with satisfactorily by using conditions or obligations.

Horsham District Council has acknowledged that the site is allocated for the proposed use, and that it has reservations over the impact of the proposed facilities. I believe that West Sussex County Council should refuse permission for this development (and can do so without loss of face) due to the material considerations which have arisen since the Waste Local Plan 2014 was prepared.

**Waste Local Plan**

The Brookhurst Wood site was identified as a strategic waste site subject to a number of development principles (section 7.3.14) in the West Sussex Waste Local Plan adopted in April 2014 covering the period to 2031 ([www.westsussex.gov.uk](http://www.westsussex.gov.uk), search Waste Local Plan). The Planning Inspector in his report on the West Sussex Waste Local Plan commented that "No substantive representations were made that either allocation at Brookhurst Wood (built facility or the landfill) would render the Plan unsound". If that 'consultation' was taking place today there would be substantive representations (there are currently more than 4,000 petition signatures against this proposal and more than 1,000 objections on the WSCC Planning Portal for this application). New guidance from the European Union has urged governing bodies to steer clear of incineration technology. A report from the European Commission says that recycling must be the focus of all waste projects and that disposing of waste in landfill or incineration is the "least favourable option". The report says: "Member states are advised to gradually phase-out public support for the recovery of energy from mixed waste. When planning future investments on waste-to-energy capacity, it is essential that member states take into consideration the risk of stranded assets." The world is moving on (circular economy, Government's Clean Growth Strategy goals for zero avoidable waste by 2050, moratorium on new waste incineration capacity (Early day motion 581)) and there is a real danger that if this proposal is approved then Horsham will be left with a white elephant on its door-step.

**Policy W11 Character seeks to protect special landscape and townscape character of West Sussex**, in line with Strategic Objective 8. Proposals for waste development will only be permitted if they do not have an unacceptable impact on the character, distinctiveness and sense of place of the different areas of the County. Proposal should retain important characteristics and features and where possible development should reinforce the main natural character areas.

This proposed development is not suitable for Horsham which is a special town:

"Set in outstanding parkland and beautiful countryside the market town of Horsham offers a welcoming and attractive shopping, meeting friends, visiting local attractions and eating <http://www.thinkhorsham.co.uk/44>



award-winning environment for out."

Approval of this planning application will have an unacceptable impact on the character and sense of place of Horsham - a point emphasised by a number of residents who have recently moved to Horsham who are objecting to this proposal. Horsham is a town not an industrial city.

**Policy W12 High Quality Development requires waste development to be of a high quality**, taking account of the need to integrate into and enhance where possible adjoining land-uses to minimise potential conflicts. Developers should also have regard for the local context, including local traditions, character, topography, landscape and skyline. Consideration should be given to views inside and outside of the site and the use of materials and building styles. Proposals must maximise water efficiency, measures to reduce greenhouse gases, and potential for renewable energy. New development must be resilient against the impact of climate change. This proposed

development does not integrate into and enhance adjoining land-uses to minimise potential conflicts. The proposed incinerator would be situated alongside the social housing to be built as part of the Land North of Horsham proposal. It has been said that the poor have had to live alongside industrial sites/factories for hundreds of years but this is 2018, not 1918 and this no longer has to be the case. An industrial incinerator can hardly be classed as a high quality development and it does not fit into the local context of Warnham and Holbrook Parishes.

**Policy W13 Protecting Landscapes** states that proposals located outside the South Downs National Park and Area of Outstanding Natural Beauty (AONB) will be permitted provided they do not undermine the designations. The CPRE's 'How to respond to planning applications: an 8-step guide' asks the question about cumulative development: "Could a proposal, broadly acceptable in itself, be a **stepping-stone to something that would be unacceptable?**" The proposed incinerator would be built within a rural area. Although, there are buildings on the site which are used for industrial purposes, approval of this planning application would set a precedent and may lead to the further industrialisation of Langhurstwood Road and the surrounding area. This is self-evidently inappropriate as the Land North of Horsham development has now been approved, the Section 106 monies agreed and the Judicial Review period has passed (during which time the applicant could have objected). The application site will be visible from within the High Weald AONB. This massive building has the potential to inflict a significant negative impact on the landscape. Approval of this planning application would set a precedent for further industrial development in the North of Horsham which is not part of Horsham District Council's Strategic Plan.

**Policy W18 Transport** requires, where practical and viable, that proposals make use of rail. Development will only be permitted where transport links are adequate and vehicles generated from the development do not have an unacceptable impact on local amenity, character or environment. Where the need for road transport is demonstrated, materials must be transported using the Lorry Route Network. Increased vehicle movements must not have an unacceptable impact on local highways capacity and the safety of road users should not be adversely affected. Proposals must be designed with adequate lorry turning space. **No use of rail has been proposed despite the fact that the proposed incinerator site is adjacent to a railway line.** WSCC has approved the signalisation of the A264 from Kilnwood Vale to Southwater which will impact the dual-carriageway adjoining Langhurstwood Road, reducing the speed of vehicles to 50 miles per hour or under and increasing the number of vehicles waiting at traffic lights. The impact of this will be that if the number of HGVs going to and from the proposed incinerator site reached capacity then all these vehicles would periodically be stationary at traffic lights emitting unhealthy diesel fumes.

**Policy W19 Public Health and Amenity**, in line with **Strategic Objective 13**, outlines that any emission from the development (lighting, noise, odour etc.) should be controlled to avoid adverse impact on public health and amenity. Public rights of way should be safeguarded. Where necessary a site liaison group should be established to allow communication between the site operator and local community. **The South Downs was awarded International Dark Sky status in May 2016 to reflect the quality of the skies. The lighting of the building and lights to alert airplanes to its presence impact adversely on the local 'dark sky'.** A new state of the art incinerator at Dargavel in Dumfries has had its operations restricted by SEPA (Scottish Environmental Protection Agency) due to airborne dioxin releases at up to two and a half times the permitted levels. An article reporting on the situation states: " ..these new 'state of the art' plants are always touted at Planning Inquiries as being 'perfectly safe' and 'operating within tolerable levels', posing 'little or no health risk'. Clearly this latest news shows these assertions to be nothing more than a fabrication and **it should reinforce residents' objections to these plants on health grounds.** Incinerator firms are now well versed at playing down the health risks at Public Inquiries, backed by various other Quangos and the Government themselves who insist that the health risks are negligible at best. This news should push the health card higher up the agenda once again, and rightly so as these plants are long term health time bombs and could become the 'asbestos scandal' for the next generation."

<https://www.anti-incinerator.org.uk/toxic-emissions-from-scottish-incinerator-spark-cancer-fears/> **There is insufficient evidence that siting an Industrial Incinerator in close proximity to a residential area is a safe thing to do.**

**Policy W21 Cumulative Impacts** notes that development will be permitted only where the proposed development combined with other existing/ planned developments **do not result in an unreasonable level of disturbance to the local environment**. Phasing agreements may be sought to minimise adverse impacts. **There would be an unreasonable level of disturbance should this planning application be approved – not only at construction stage, but at an operational stage ie the capacity-level HGVs lorries patrolling the area emitting diesel fumes, and the disturbance to the local environment.**

#### **Environmental statement - alternatives to the development proposal**

The CPRE's 'How to respond to planning applications: an 8-step guide' states: "If an assessment is required, the developer must present an 'environmental statement' along with the planning application. This should explain how measures taken in the development do the least possible harm to the environment and what that harm will be.

**Environmental statements should look at alternatives to the development proposal. The public has the right to comment on the environmental statement."** **The Environmental Statement submitted with the Planning Application does not consider alternatives to the development proposal.**

#### **Statement of community involvement**

This is deemed to be unsatisfactory. A few hours' communication exercise in a back room at Roffey Millennium Hall over a couple of days was really not sufficient in order to communicate the significant proposals to the public. A very large proportion of people I have spoken with had no idea that this proposal was on the table again. I think there is a certain amount of disbelief that this is a serious proposal in this place, at this time.

**Rosemary Couchman**

**Petworth Drive, Horsham RH12 5JH**

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Mr Sam Dumbrell  
 West Sussex County Council  
 Development Control  
 County Hall, Tower Street  
 Chichester  
 West Sussex  
 PO19 1RH

**Date:** 3rd May 2018  
**Your Ref:** WSCC/015/NH  
**Our Ref:** 050

**Dear Mr Dumbrell,**

**The Town and Country Planning Act 1990 (As Amended)**

**FORMER WEALDEN BRICKWORKS SITE, LANGHURST WOOD ROAD, HORSHAM, RH12 4QD**

**OBJECTION TO APPLICATION FOR RECYCLING, RECOVERY AND RENEWABLE ENERGY FACILITIES AND ANCILLARY INFRASTRUCTURE REFERENCE: WSCC/015/NH**

We write on behalf of Verve Properties, the owners of the Graylands Estate, Langhurst Wood Road, in objection to the application for recycling, recovery and renewable energy facilities and ancillary infrastructure at the former Wealden Brickworks site, Langhurst Wood Road, Horsham, RH12 4QD. We are extremely disappointed that Verve were not informed directly about this application and were reliant on a local resident to inform us of the application three days ago. The owners have not received notification of this application and were not aware of any public consultation event announcing the new plans for the site.

### **Introduction**

The boundary of the Graylands Estate lies approximately 250m to the northeast for the furthest extent of the application site. There are a number of residential properties on site amounting to approximately 20 dwellings, in addition to commercial properties (use classes B1-B8) which cater for small and medium-sized businesses. Sole access to the site is from Langhurst Wood Road.

The application is not significantly different to the withdrawn application (Ref: WSCC/062/16/NH) of December 2016 on the two key issues identified to be of concern at that time including: noise and light pollution. In addition, the Council has now permitted the Horsham northern extension with 2,750 new homes and businesses to come forward over the coming years. The implementation of this consent will transform the character of land to the north of the A264, creating a conflict with the existing and proposed industrial waste transfer activities at the former Wealden Brickworks site. It will particularly require HGV vehicles servicing the Recycling, Recovery and Renewable Energy Facility (3Rs Facility) to use the same access road proposed to service the western end of the new urban area, which constructs a new part of Langhurstwood Road through the new residential estate. Again a conflict with residential sensitive users.

### **Grounds of Objection**



*Policy W19 of the West Sussex Waste Local Plan (2014)* requires emissions from developments (including lighting, noise, odour, et.) to be controlled to avoid adverse impact on public health and amenity. The proposed development is contrary to this policy and would result in adverse amenity impacts on the surrounding properties including those on the Graylands Estate. Whilst Verve acknowledge the site currently operates as a waste transfer station and materials recycling facility, it objects to the proposed application for the following reasons:

- The construction and operation of the site would result in noise disturbance of the surrounding properties, particularly in the evenings and at night time.
- The 24hour operation of the site and the aviation lighting would result in light pollution to the detriment of the surrounding properties and wider countryside. The applicant suggests that dimmer lights will be used at night but it is not known how this will be enforced/controlled.

### **Noise Disturbance**

The proposed development would increase noise for the surrounding area at both the construction and operation phases of the development, through both operational activities and vehicular movements.

#### Operation

The Environmental Statement (ES) suggest the cumulative impacts of the operational noise will only be 'minor adverse'. However, Verve contends that the type of noise and its 24 hour duration would have a greater impact on surrounding properties than a simplistic measure against baseline standards.

Although there are some pre-existing waste transfer and other industrial uses on the site and its immediate surroundings, the site is currently in a rural location and all other noise producing businesses are not operating at night time. This development would introduce operational noise 24 hours a day, 7 days a week. From our understanding of the development, the noise would be constant and not intermittent (like aviation traffic). Any increase in noise from the operation, particularly at night-time would add to the ambient noise level at a constant level and not decrease at any time. Paragraph 8.8.4 of the ES notes that the night-time noise levels would exceed the background sound level by a significant level at Graylands Lodge. Therefore, the residents of Graylands Lodge and other nearby residential properties would experience an increase in noise at a continuous level, permanently, which would significantly impact their amenity.

This is compounded by the change in the character of the ambient noise. It is acknowledged in the ES that 'the character of the sound would be different'. Given the rural night-time experience of Graylands and the surrounding properties, we argue that the effects of increased noise are more keenly felt by residents as the noise would be easily distinguishable from the existing background noise.

The 24hour operation of the site would also result in extra night-time vehicular movements on Langhurst Wood Road. Although the application states that HGV movements would only be between 07:00 and 19:00 hrs.

#### Construction

The Environmental Statement acknowledges that construction noise will be heard from surrounding properties. The construction hours proposed under this application are increased from condition 19 of the previous permission (ref: WSCC/018/14/NH). The latening of construction hours by 1 hour during weekdays and 4 hours at the weekend, would be significantly detrimental to the amenity neighbouring residential properties. As a result of the increase in hours, both the construction noise and the resultant vehicular movements of construction and construction workers' vehicles would increase noise levels at a time when the roads would generally be less busy and ambient noise levels lower.

The Planning Statement notes that there might be up to 182 construction workers on the site at any one time. The movements of these workers by vehicle, plus the delivery of construction materials

would take considerable time to arrive and depart from the site at the before and after the hours of construction, extending the time when the site and site traffic would create noise disturbance to neighbours.

Furthermore, the applicant states that construction will take place outside of those hours. This should be expressly forbidden so that construction noise is adequately controlled for the amenity of surrounding residents.

### **Light Pollution**

The introduction of 24 hour operations at the site would result in increased night-time artificial lighting at the site both at the external accesses of the site and the car park, but also at high level due to the required aviation safety lighting. The impacts of this light pollution on the surrounding properties have not been adequately assessed. The applicant suggests that dimmer lights will be used at night but it is not known how this will be enforced/controlled.

The Planning Statement states that the developers aim to minimise light pollution by improved landscaping at the boundary. The lighting scheme shows a significant number of external lights, particularly along the borders of the site at a height of 6 meters. However, the landscaping is proposed to be grass, wildflower meadows and scrub. These would not mitigate the emission of light into the surroundings, except at a very low level. The light pollution impacts of the additional night-time lighting of the site does not appear to have been assessed in the application documents. For example, if there are cumulative impacts with other night-time sources, or whether light pollution might be increase in winter months with the loss of foliage on surrounding vegetation.

The proposed aviation safety lighting is proposed to be 'medium intensity' at a level of over 90m. This will, of course, be visible from the surrounding area, however its impacts on the surrounding properties has also not been assessed.

The proposed 3Rs Facility would have significant impacts on the amenity of the surrounding properties, including those on the Graylands estate, which are unacceptable and contrary to *West Sussex Waste Local Plan Policy W19*. The current operation of a waste transfer and recycling facility on the site should not be used to set precedent for the proposed incinerator as the increase in hours and change in nature of operations would significantly alter the site's impacts on the surrounding properties. The 24 hour operation of the site would increase night-time noise levels overall and introduce a different character of noise which would disturb neighbouring residents throughout the night. The 24 hour operation of the site and the proposed 95m stack require external lighting which could result in detrimental light pollution. However, the application documents do not adequately assess the impacts of these.

The application documents use the proposed Land North of Horsham (LNH) site to create a more 'urban context' to the site. However, the closest part of that development to this site would be a cemetery and allotments, which would be largely green open spaces, which would not be used at night time. Further south the residential properties would also be quiet at night. Since these are not proposed to be constructed for at least 10 years, the impacts of the proposed incinerator would sit in isolation for a considerable amount of time.

For the reasons set out above, we respectfully request that planning permission be refused for the proposed recycling, recovery and renewable energy facilities and ancillary infrastructure at the Former Wealden Brickworks Site, Langhurst Wood Road.

Yours faithfully,

*PowerHaus Consultancy*

**PowerHaus Consultancy**

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**From:** Alexandra FitzPatrick [REDACTED]  
**Sent:** 03 May 2018 20:37  
**To:** PL Planning Applications  
**Subject:** WSCC/015/18/NH

## **OBJECTION**

I strongly object to the above planning application in its entirety due to numerous reasons:

### **Non-compliance with WSCC's Waste Local Plan**

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The application is to import business and commercial waste from far afield – it is not for local residential waste

**Strategic Objective 11:** *To protect and, where possible, enhance the natural and historic environment and resources of the County.* The application does not enhance the natural environment.

**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.....* the application will have an unacceptable impact due to its size and emissions

**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 application is unable to meet this policy on any of the stated criteria.

**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 application requires aviation lighting at over 90m high fully visible from our property and the stated noise increase in our road 24hr/day, 365 days/year means that it fails on both noise impact and lighting.

### **Visual Appearance**

The incinerator building and stack are enormous. I have attached a correctly scaled adapted photo to demonstrate how the plans will severely adversely affect the skyline and view from our house ref: "Incinerator view from The Granary MW2". Note this was for the first application which was withdrawn. Whilst the building has now been reduced in height it is only a minor reduction and will still be seen massively over the skyline year round

### **Noise**

The application states the background noise in Station Road where we live will be increased continuously. This is a rural location (see view above) and is unacceptable, especially at night and weekends. We live in a Grade II listed building and would be unable to install sound insulation, even if paid for by the applicant, due to Listed Buildings Consent to mitigate this noise increase.

## **Impact on Listed Buildings**

Our building is Grade II Listed circa 1650. Horsham District Council: Gypsy, Traveller and Travelling Showpeople Sites Study final report October 2011 states WAR003 “Land adjacent to Westons Place” was rejected as a potential traveller site for the reason that a “*Gypsy and Traveller development in this location would impact on the setting of Listed Buildings to the south west of the site.*” This land in question is again the paddocks shown in the adapted photo in “Visual Appearance” above. It is clear that Horsham District Council have set a precedent to not impact these historical buildings which are protected for national heritage. This planning application will severely impact our historically significant building and others in the vicinity.

## **Blight**

In the 2000's our property, together with another 10 or 12, were impacted by WSCC plans for the A24 bypass. This significantly reduced the value of the properties. WSCC were taken to court where they lost and were forced to purchase all the affected properties and land at pre-blighted values. It is clear from the size of this incinerator building and stack that for reasons of visual and emission impact that if this application is allowed to proceed our home will once again be impacted by blight. If this should occur all costs associated with this will naturally need to be claimed from the applicant and WSCC as appropriate

## **Emissions and air pollution**

Public Health England has funded a new appraisal of research into the pollution effects of incinerators and was due for publication in spring 2017. Other incinerator projects that have been built or in the process of planning have received huge public outrage for the plants not meeting the criteria stated in the applications. These include increased infant mortality, decreased recycling in the locality due to recycled materials such as paper, cardboard and plastics being needed to be incinerated to keep the process hot enough and efficient enough. This is unacceptable. Horsham has an excellent record for recycling and this should not be impacted to allow a private company to profit. The emissions from this application will fall (as has been demonstrated by various stack plume CFD models freely posted on the internet) over our village, school and further afield over Crawley, Horsham and the 2750 house North Horsham Development which is on the verge of being built. Again this is completely unacceptable

## **Conclusion**

The development in this application is of a scale totally out of proportion to local demand, its rural location and countryside environment.

It does not meet the WSCC Waste local plan.

It will impact our family's quality of life from noise, emissions and light pollution.

It will negatively impact the value of our property and land leading to blight.

I object to the application and wish it to be refused in its entirety.

Sent from my iPad

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**From:** Emma Rees [REDACTED]  
**Sent:** 03 May 2018 22:53  
**To:** PL Planning Applications  
**Cc:** david.sheldon@westsussex.gov.uk; Nigel Dennis; Morwen Millson;  
elizabeth.kitchen@westsussex.gov.uk; Louise Goldsmith  
**Subject:** Application for planning permission Incinerator, North Horsham:  
WSCC/015/18/NH

To whom it may concern.

I wish to lodge an objection to the planning application **WSCC/015/18/NH**.

Please note that I have tried to do this online but keep getting a server error message.

I am a Horsham resident and council tax payer, address below.

Please see the text below for details of the objections.

Yours sincerely,

Emma Rees  
Fig House  
Werst Parade  
Horsham  
RH12 2BZ

### **Non-compliance with West Sussex County Council's Waste Local Plan**

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

**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 in fact it will detract and blight being visible from 15kms away in areas of Area of Outstanding Natural Beauty. We should question 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.

## **Light Pollution**

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 3-5nm either side of the line. The mapping does not show arrivals.

The stack will be brightly lit producing significant increase in light pollution from the plant and the skyline.

## **Recycling**

WSCC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSCC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## **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.

## **Visual Impact of the development**

The proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally 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.

## **Noise intrusion**

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 would seem a significant increase in noise that local residents would have to tolerate.

## **The Environmental Arguments**

Research increasingly indicates that incineration reduces recycling.

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.

With the increased push in the UK to reduce our reliance on plastics and recycle more, many experts predict that within 5 years we will have solved the plastics issue. Industry is changing and will no longer rely on plastic packaging.

Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK.

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**From:** PAUL RICHARDSON [REDACTED]  
**Sent:** 03 May 2018 17:02  
**To:** PL Planning Applications  
**Subject:** WSCC/015/18/NH

Sir/madam

I wish my objection to this planning application to be included.

I object to this scheme for the following reasons:-

The size of the construction is excessive large and high and will have a major impact on Horsham and surrounding villages as well as potentially Surrey areas of outstanding natural beauty.

**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 seems to be seeking waste from outside the local area and thus will encourage commercial waste being transferred over great distance to feed a very large incinerator.

there is nothing to suggest that this will enhance the local area in fact it will detract and blight being visible from 10 miles away in areas of Area of Outstanding Natural Beauty. We should question 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.

## Light Pollution

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.



## Recycling

WSSC have shown 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 overcapacity 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.

The proposer has stated that they intend to burn black sack waste as well as industrial. WSSC taxpayers paid for the Biffa biomechanical digester, and visitors to the public exhibition have reported being told by Britaniacrest that the digester would become redundant due to the incinerator. This is an unacceptable waste of taxpayers money.

Burning waste is short sighted and damaging to the long-term prosperity and well-being of the environment.

## 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.

## Visual Impact of the development

The revised proposal does nothing to hide the impact it will have on the rural countryside for which it will sit amongst, being totally overpowering 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.

## Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased by 6dB at three locations. This would seem a significant increase in noise that local residents would have to tolerate.

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Government ministers are starting to push for a moratorium on incineration facilities because we already have surplus capacity for burning waste in the UK. Will West Sussex be left with a white elephant?

Regards

Paul Richardson

7 Nymans Close

Horsham

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**From:** Nicki Weir [REDACTED]  
**Sent:** 03 May 2018 20:48  
**To:** PL Planning Applications  
**Cc:** Sam Dumbrell  
**Subject:** WSCC/015/18/NH

## **OBJECTION**

I strongly object to the above planning application in its entirety due to numerous reasons:

### **Non-compliance with WSCC's Waste Local Plan**

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The application is to import business and commercial waste from far afield – it is not for local residential waste

**Strategic Objective 11:** *To protect and, where possible, enhance the natural and historic environment and resources of the County.* The application does not enhance the natural environment.

**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.....* the application will have an unacceptable impact due to its size and emissions

**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 application is unable to meet this policy on any of the stated criteria.

**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 application requires aviation lighting at over 90m high fully visible from our property and the stated noise increase in our road 24hr/day, 365 days/year means that it fails on both noise impact and lighting.

### **Visual Appearance**

The incinerator building and stack are enormous. I have attached a correctly scaled adapted photo to demonstrate how the plans will severely adversely affect the skyline and view from our house ref: "Incinerator view from The Granary MW2". Note this was for the first application which was withdrawn. Whilst the building has now been reduced in height it is only a minor reduction and will still be seen massively over the skyline year round

### **Noise**

The application states the background noise in Station Road where we live will be increased continuously. This is a rural location (see view above) and is unacceptable, especially at night and weekends. We live in a Grade II listed building and would be unable to install sound insulation, even if paid for by the applicant, due to Listed Buildings Consent to mitigate this noise increase

In the 2000's our property, together with another 10 or 12, were impacted by WSCC plans for the A24 bypass. This significantly reduced the value of the properties. WSCC were taken to court where they lost and were forced to purchase all the affected properties and land at pre-blighted values. It is clear from the size of this incinerator building and stack that for reasons of visual and emission impact that if this application is allowed to proceed our home will once again be impacted by blight. If this should occur all costs associated with this will naturally need to be claimed from the applicant and WSCC as appropriate

### **Emissions and air pollution**

Public Health England has funded a new appraisal of research into the pollution effects of incinerators and was due for publication in spring 2017. Other incinerator projects that have been built or in the process of planning have received huge public outrage for the plants not meeting the criteria stated in the applications. These include increased infant mortality, decreased recycling in the locality due to recycled materials such as paper, cardboard and plastics being needed to be incinerated to keep the process hot enough and efficient enough. This is unacceptable. Horsham has an excellent record for recycling and this should not be impacted to allow a private company to profit. The emissions from this application will fall (as has been demonstrated by various stack plume CFD models freely posted on the internet) over our village, school and further afield over Crawley, Horsham and the 2750 house North Horsham Development which is on the verge of being built. Again this is completely unacceptable

### **Conclusion**

The development in this application is of a scale totally out of proportion to local demand, its rural location and countryside environment.

It does not meet the WSCC Waste local plan.

It will impact our family's quality of life from noise, emissions and light pollution.

It will negatively impact the value of our property and land leading to blight.

I object to the application and wish it to be refused in its entirety.

Nicola Weir  
15 Walton Drive  
Rh136Rq  
Nicki Weir  
Sent from my iPhone

**From:** [Caroline Lewis](#)  
**To:** [PL Planning Applications](#)  
**Subject:** Ref: WSCC/015/18/NH - OBJECTION  
**Date:** 03 May 2018 16:43:12  
**Attachments:** [IncineratorReport\\_v3.pdf](#)

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Please note this as an objection to the building of an incinerator in Horsham.

I am gravely concerned about both the short-term and long term implications on the health and mortality of West Sussex residents should the incinerator go ahead. You have a duty of care to the residents and should stop this.

I've attached a report on the implications of living in close proximity to an incinerator for your reference.

Thanks

Caroline

**Caroline Lewis**

# The Health Effects of Waste Incinerators

## 4<sup>th</sup> Report of the British Society for Ecological Medicine

Second Edition  
June 2008

Moderators: Dr Jeremy Thompson and Dr Honor Anthony

### **Preface to Second Edition**

Since the publication of this report, important new data has been published strengthening the evidence that fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality (see section 3.1) and demonstrating that the danger is greater than previously realised. More data has also been released on the dangers to health of ultrafine particulates and about the risks of other pollutants released from incinerators (see section 3.4). With each publication the hazards of incineration are becoming more obvious and more difficult to ignore.

In the light of this data and the discussion provoked by our report, we have extended several sections. In particular, the section on alternative waste technologies (section 8) has been extensively revised and enlarged, as has that on the costs of

incineration (section 9), the problems of ash (9.4), radioactivity (section 9.5), and the sections on monitoring (section 11), and risk assessment (section 12).

We also highlight recent research which has demonstrated the very high releases of dioxin that arise during start-up and shut-down of incinerators (section 11). This is especially worrying as most assumptions about the safety of modern incinerators are based only on emissions which occur during standard operating conditions. Of equal concern is the likelihood that these dangerously high emissions will not be detected by present monitoring systems for dioxins.

## Foreword to the 1<sup>st</sup> Edition

from **Professor C. V. Howard. MB. ChB. PhD. FRCPATH.**

The authors are to be congratulated on producing this report. The reader will soon understand that to come to a comprehensive understanding of the health problems associated with incineration it is essential to become acquainted with a large number of different disciplines ranging from aerosol physics to endocrine disruption to long range transport of pollutants. In most medical schools, to this day, virtually nothing is routinely taught to equip the medical graduate to approach these problems. This has to change. We need the medical profession to be educated to health consequences associated with current environmental degradation.

There are no certainties in pinning specific health effects on incineration: the report makes that clear. However this is largely because of the complexity of exposure of the human race to many influences. The fact that 'proof' of cause and effect are hard to come by is the main defence used by those who prefer the *status quo*. However the weight of evidence, collected within this report, is sufficient in the authors' opinion to call for the phasing out of incineration as a way of dealing with our waste. I agree with that.

There is also the question of sustainability. Waste destroyed in an incinerator will be replaced. That involves new raw materials, manufacture, transport, packaging etc etc. In contrast, reduction, reuse and recycling represent a win-win strategy. It has been shown in a number of different cities that high levels of diversion of waste (>60%) can be achieved relatively quickly. When that happens, there is not very much left to burn, but a number of the products left will be problematic, for example PVC. Incineration, an end of pipe approach, sends the message 'No problem, we have a solution for disposal of your product, carry on business as usual'. What should happen is a 'front end solution'. Society should be able to say 'Your product is unsustainable and a health hazard – stop making it'.

Incineration destroys accountability and this encourages industries to go on making products that lead to problematic toxic wastes. Once the waste has been reduced to ash who can say who made what? The past 150 years has seen a progressive 'toxification' of the waste stream with heavy metals, radionuclides and synthetic halogenated organic molecules. It is time to start reversing that trend. We won't achieve that while we continue to incinerate waste.

Vyvyan Howard

December 2005

Professor of Bioimaging, Centre for Molecular Biosciences,  
University of Ulster, Cromore Road, Coleraine, Co. Londonderry BT52 1SA



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## **Executive Summary**

- Large studies have shown higher rates of adult and childhood cancer and also birth defects around municipal waste incinerators: the results are consistent with the associations being causal. A number of smaller epidemiological studies support this interpretation and suggest that the range of illnesses produced by incinerators may be much wider.
- Incinerator emissions are a major source of fine particulates, of toxic metals and of more than 200 organic chemicals, including known carcinogens, mutagens, and hormone disrupters. Emissions also contain other unidentified compounds whose potential for harm is as yet unknown, as was once the case with dioxins. Since the nature of waste is continually changing, so is the chemical nature of the incinerator emissions and therefore the potential for adverse health effects.
- Present safety measures are designed to avoid acute toxic effects in the immediate neighbourhood, but ignore the fact that many of the pollutants bioaccumulate, enter the food chain and can cause chronic illnesses over time and over a much wider geographical area. No official attempts have been made to assess the effects of emissions on long-term health.
- Incinerators produce bottom and fly ash which amount to *30-50% by volume of the original waste* (if compacted), and require transportation to landfill sites. Abatement equipment in modern incinerators merely transfers the toxic load, notably that of dioxins and heavy metals, from airborne emissions to the fly ash. This fly ash is light, readily windborne and mostly of low particle size. It represents a considerable and poorly understood health hazard.
- Two large cohort studies in America have shown that fine (PM<sub>2.5</sub>) particulate air pollution causes increases in all-cause mortality, cardiovascular mortality and mortality from lung cancer, after adjustment for other factors. A more recent, well-designed study of morbidity and mortality in postmenopausal women has confirmed this, showing a 76% increase in cardiovascular and 83% increase in cerebrovascular mortality in women exposed to higher levels of fine particulates. These fine particulates are primarily produced by combustion processes and are emitted in large quantities by incinerators.
- Higher levels of fine particulates have been associated with an increased prevalence of asthma and COPD.
- Fine particulates formed in incinerators in the presence of toxic metals and organic toxins (including those known to be carcinogens), adsorb these pollutants and carry them into the blood stream and into the cells of the body.
- Toxic metals accumulate in the body and have been implicated in a range of emotional and behavioural problems in children including autism, dyslexia, attention deficit and hyperactivity disorder (ADHD), learning difficulties, and delinquency, and in problems in adults including violence, dementia, depression and Parkinson's disease. Increased rates of autism and learning disabilities have been noted to occur around sites that release mercury into the environment. Toxic metals are universally present in incinerator emissions and present in high concentrations in the fly ash.
- Susceptibility to chemical pollutants varies, depending on genetic and acquired factors, with the maximum impact being on the foetus. Acute

exposure can lead to sensitisation of some individuals, leaving them with life-long low dose chemical sensitivity.

- Few chemical combinations have been tested for toxicity, even though synergistic effects have been demonstrated in the majority of cases when this testing has been done. This synergy could greatly increase the toxicity of the pollutants emitted, but this danger has not been assessed.
- Both cancer and asthma have increased relentlessly along with industrialisation, and cancer rates have been shown to correlate geographically with both toxic waste treatment facilities and the presence of chemical industries, pointing to an urgent need to reduce our exposure.
- In the UK, some incinerators burn radioactive material producing radioactive particulates. Inhalation allows entry into the body of this radioactive material which can subsequently emit alpha or beta radiation. These types of radiation have low danger outside the body but are highly destructive within. No studies have been done to assess the danger to health of these radioactive emissions.
- Some chemical pollutants such as polyaromatic hydrocarbons (PAHs) and heavy metals are known to cause genetic changes. This represents not only a risk to present generations but to future generations.
- Monitoring of incinerators has been unsatisfactory in the lack of rigor, the infrequency of monitoring, the small number of compounds measured, the levels deemed acceptable, and the absence of biological monitoring. Approval of new installations has depended on modelling data, supposed to be scientific measures of safety, even though the method used has no more than a 30% accuracy of predicting pollutants levels correctly and ignores the important problems of secondary particulates and chemical interactions.
- It has been claimed that modern abatement procedures render the emissions from incinerators safe, but this is impossible to establish and would apply only to emissions generated under standard operating conditions. Of much more concern are non-standard operating conditions including start-up and shut-down when large volumes of pollutants are released within a short period of time. Two of the most hazardous emissions – fine particulates and heavy metals – are relatively resistant to removal.
- The safety of new incinerator installations cannot be established in advance and, although rigorous independent health monitoring might give rise to suspicions of adverse effects on the foetus and infant within a few years, this type of monitoring has not been put in place, and in the short term would not reach statistical significance for individual installations. Other effects, such as adult cancers, could be delayed for at least ten to twenty years. It would therefore be appropriate to apply the precautionary principle here.
- There are now alternative methods of dealing with waste which would avoid the main health hazards of incineration, would produce more energy and would be far cheaper in real terms, if the health costs were taken into account.
- Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated, which is not in keeping with the concept of a just

society. Nor is the present policy of locating incinerators in deprived areas where their health effects will be maximal: this needs urgent review.

- Reviewing the literature for the second edition has confirmed our earlier conclusions. Recent research, including that relating to fine and ultrafine particulates, the costs of incineration, together with research investigating non-standard emissions from incinerators, has demonstrated that the hazards of incineration are greater than previously realised. The accumulated evidence on the health risks of incinerators is simply too strong to ignore and their use cannot be justified now that better, cheaper and far less hazardous methods of waste disposal have become available. We therefore conclude that no more incinerators should be approved.

## **1. Introduction**

Both the amount of waste and its potential toxicity are increasing. Available landfill sites are being used up and incineration is being seen increasingly as a solution to the waste problem. This report examines the literature concerning the health effects of incinerators.

Incinerators produce pollution in two ways. Firstly, they discharge hundreds of pollutants into the atmosphere. Although some attention has been paid to the *concentrations* of the major chemicals emitted in an effort to avoid acute local toxic effects, this is only part of the problem. Many of these chemicals are both toxic and bio-accumulative, building up over time in the body in an insidious fashion with the risk of chronic effects at much lower exposures. Little is known about the risks of many of these pollutants, particularly when combined. In addition, incinerators convert some of the waste into ash and some of this ash will contain high concentrations of toxic substances such as dioxins and heavy metals, creating a major pollution problem for future generations. Pollutants from landfill have already been shown to seep down and pollute water sources. It is also important to note that incineration does not solve the landfill problem because of the large volumes of the ash that are produced.

There have been relatively few studies of populations exposed to incinerator emissions or of occupational exposure to incinerators (see section 4), but most show higher-than-expected levels of cancer and birth defects in the local population and increased ischaemic heart disease has been reported in incinerator workers. These findings are disturbing but, taken alone, they might only serve to alert the scientific community to possible dangers but for two facts. The first is the acknowledged difficulty of establishing beyond question the chronic effects associated with any sort of environmental exposure. The second is the volume of evidence linking health effects with exposure to the individual combustion products known to be discharged by incinerators and other combustion processes.

The purpose of this report is to look at all the evidence and come to a balanced view about the future dangers that would be associated with the next generation of waste incinerators. There are good reasons for undertaking this review. The history of science shows that it often takes decades to identify the health effects of toxic exposures but, with hindsight, early warning signs were often present which had gone unheeded. It is rare for the effects of environmental exposures to have been anticipated in advance. For instance it was not anticipated that the older generation of

incinerators in the UK would prove to be a major source of contamination of the food supply with dioxins. In assessing the evidence we shall also look at data from a number of other areas which we believe to be relevant, including research on the increased vulnerability of the foetus to toxic exposures, and the risk of synergistic effects between chemicals, the higher risks to people more sensitive to chemical pollution, the difficulties of hazard assessment, the problems of monitoring and the health costs of incineration.

## **2. Emissions from Incinerators and other Combustion Sources**

The exact composition of emissions from incinerators will vary with what waste is being burnt at any given time, the efficiency of the installation and the pollution control measures in place. A municipal waste incinerator will take in a great variety of waste contaminated by heavy metals and by man-made organic chemicals. During incineration more toxic forms of some of these substances can be created. The three most important constituents of the emissions, in terms of health effects, are particulates, heavy metals and combustion products of man-made chemicals; the latter two can be adsorbed onto the smaller particulates making them especially hazardous. The wide range of chemicals known to be products of combustion include sulphur dioxide, oxides of nitrogen, over a hundred volatile organic compounds (VOCs), dioxins, polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and furans.

### **2.1 Particulates**

Particulates are tiny particles in the air that are classified by size.  $PM_{10}$ s have a diameter of less than 10 microns whereas fine particulates ( $PM_{2.5}$ s) are less than 2.5 microns and ultrafine particulates ( $PM_{0.1}$ s) are less than 0.1 micron. Incinerators produce huge quantities of fine and ultrafine particulates. Incinerators are permitted to emit particulates at a rate of 10mg per cubic metre of gaseous discharge. The commonly-used baghouse filters act like a sieve, effectively allowing the smallest particulates to get through and blocking the less dangerous, larger particulates. Only 5-30% of the  $PM_{2.5}$ s will be removed by these filters and virtually none of the  $PM_{0.1}$ s. In fact the majority of particles emitted by incinerators are the most dangerous ultrafine particulates<sup>1</sup>. The baghouse filters are least effective at removing the smallest particles, especially those of 0.2 to 0.3 microns, and these will have a considerable health impact. Health effects are determined by the number and size of particles and not the weight. Measurements of the particle size distribution *by weight* will give a false impression of safety due to the higher weight of the larger particulates. Pollution abatement equipment, installed to reduce emissions of nitrogen oxides, may actually increase emissions of the  $PM_{2.5}$  particulates<sup>2</sup>. The ammonia used in this process reacts with sulphurous acid formed when steam and sulphur dioxide combine as they travel up the stack, leading to the production of secondary particulates. These secondary particulates are formed beyond the filters and emitted unabated: they can easily double the total volume of particulates emitted<sup>3</sup>. Present modelling methods do not take secondary particulates into account (see section 12).

Studies have shown that toxic metals accumulate on the smallest particulates<sup>3</sup> and that 95% of polycyclic aromatic hydrocarbons (PAHs) are associated with fine

particulates (PM<sub>3</sub> and below) <sup>5-7</sup>. PAHs are toxic and carcinogenic, and it has been estimated that these increase the lung cancer risk by 7.8 times<sup>8</sup>.

## **2.2 Heavy Metals**

Incinerators are allowed to emit 10mg per cubic metre of particulates and 1mg per cubic metre of metals. The limits mean little as, even within these limits, the total amount of particulates and metals emitted will vary with the volume per second of emissions generated by the incinerator and this can vary hugely. A further concern is that there are no statutory ambient air quality standards for heavy metals apart from lead, which means the levels of heavy metals in the surrounding air do not need to be monitored.

The proportion of metals to particulates allowed to be emitted by incinerators is very high and much higher than found in emissions from cars. At the high temperatures found in incinerators metals are released from metallic waste, plastics and many other substances. Many of the heavy metals emitted, such as cadmium, are toxic at very low concentrations. The selective attachment of heavy metals to the smallest particulates emitted from incinerators<sup>4</sup> increases the toxicity of these particulates. This fact is likely to make the particulates from incinerators more dangerous than particulates from other sources such as from cars.

## **2.3 Nitrogen Oxides**

Removal of nitric oxide by incinerators is only about 60% effective and the nitric oxide is then converted to nitrogen dioxide to form smog and acid rain. Sunlight acts on nitrous oxides and volatile organic compounds (VOCs) to produce another pollutant, ozone.

## **2.4 Organic Pollutants**

A wide range of organic pollutants are emitted from incinerators. These include PAHs (polycyclic aromatic hydrocarbons), PCBs (polychlorinated biphenyls), dioxins, furans, phthalates, ketones, aldehydes, organic acids and alkenes.

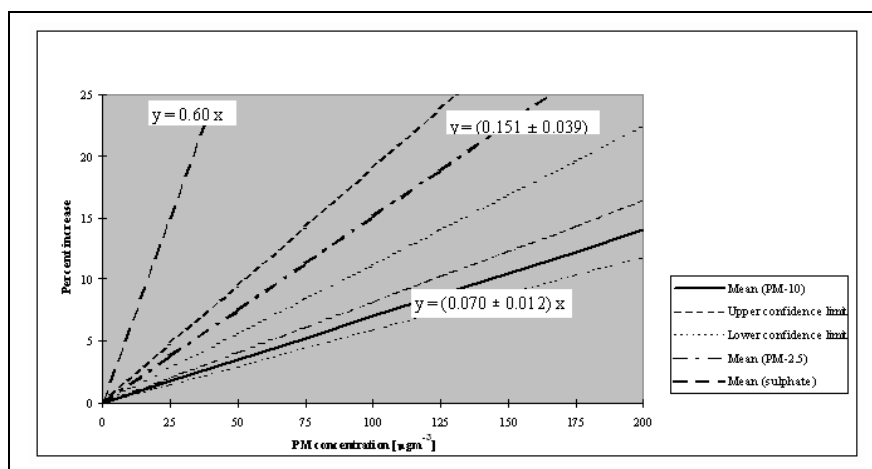
The waste being burnt now differs considerably from that burnt in the past with a higher load of heavy metals and plastics producing far greater potential for health and environmental problems. An example of this is PVC which is more than 90% organic chlorine. It has been used extensively for doors and windows and with an expected life of 40 years it is likely to appear in increasing quantities in the waste stream. This could easily raise the organic chlorine in the waste stream to over 1%, which according to the European Waste Directive would mean the waste would be regarded as hazardous.

Many of the compounds are known to be not only toxic but bio-accumulative and persistent. They include compounds that have been reported to affect the immune system<sup>9</sup>, attach to chromosomes<sup>10</sup>, disrupt hormone regulation<sup>11</sup>, trigger cancer<sup>12</sup>, alter behaviour<sup>13</sup>, and lower intelligence<sup>14</sup>. The very limited toxicity data on many of these substances is a matter of concern<sup>15</sup>. The changing nature of waste means new substances are likely to be emitted and created. For example polybrominated diphenyl ethers (PBDEs) are found in many electrical goods and are increasingly finding their way into incinerator waste. They have been found to affect brain development and affect the thyroid gland and cause behavioural and learning defects in animals<sup>16,17</sup>.

### 3. Health Effects of Pollutants

#### 3.1 Particulates

A large and growing body of literature has highlighted the dangers of particulates to health. Various studies have confirmed that *the smaller the size of the particles the more dangerous the health effects*<sup>18-21</sup>. The data from the World Health Organisation shown in the graph below clearly illustrates that PM<sub>2.5</sub> particles have a greater effect on daily mortality than the larger PM<sub>10S</sub><sup>18</sup>.



**Figure 1. Increase in daily mortality as a function of PM concentration.**  
(reproduced from ref 18, Figure 3.6)

The smaller particles are not filtered out by the nose and bronchioles and their miniscule size allows them to be breathed deeply into the lungs and to be absorbed directly into the blood stream where they can persist for hours<sup>22</sup>. They can then travel through the cell walls and into the cell nucleus affecting the cell's DNA. The WHO state that there is no safe level of PM<sub>2.5</sub><sup>18</sup> and health effects have been observed at surprisingly low concentrations with no threshold<sup>23,24</sup>. The smallest particulates, particularly the ultrafine particulates (PM<sub>0.1</sub>) are highly chemically reactive, a property of their small size and large surface area<sup>25</sup>. A further danger of the smallest particulates is that there are thousands more of them per unit weight. In incinerators heavy metals, dioxins and other chemicals can adhere to their surface<sup>26</sup> increasing their toxicity. The body does not have efficient mechanisms for clearing the deeper part of the lung as only a tiny fraction of natural particles will be as small as this.

As incinerators are effectively particulate generators and produce predominately the smaller particulates that have the biggest effect on mortality it is clear that incinerators have considerable lethal potential.

#### a) Epidemiological Studies of Particulate Pollutants

Fine particulates have been associated with both respiratory and cardiovascular disease<sup>27</sup> and with lung cancer<sup>19,28</sup>.



Two large cohort studies in the USA showed increasing mortality with increasing levels of PM<sub>2.5</sub> pollution. In the Six City Study published in 1993<sup>19</sup>, 8,111 individuals were followed for 14-16 years (1974-1991), involving a total of 111,076 person years, to examine the effect of air pollution, allowing for smoking and other individual factors. As expected, the greatest risk factor was smoking (adjusted mortality-rate ratio 1.59) but, after allowing for individual factors, mortality rates showed highly significant associations ( $p < 0.005$ ) with the levels of fine particles and sulphate particles in the cities, with the most polluted city giving an adjusted all-cause mortality rate of 1.26 compared to the least. This related to a PM<sub>2.5</sub> difference of 18.6 µg per cubic metre: cardiopulmonary mortality was increased by 37% and lung cancer mortality was also 37% higher.

In the American Cancer Society study<sup>20</sup>, 552,138 adults (drawn from the Cancer Prevention II study) were followed from 1982 to 1989 and deaths analysed against mean concentrations of sulphate air pollution in 1980 and the median fine particulate concentration from 1979-1983, both obtained for each participant's area of residence from Environmental Protection Agency (EPA) data. Again, the strongest correlation was between lung cancer and smoking (adjusted mortality risk ratio 9.73), but both pollution measures showed highly significant association with all-cause mortality and with cardiopulmonary mortality: sulphates were also associated with lung cancer. After adjusting for smoking and other variables, higher fine particulate pollution was associated with a 17% increase in all-cause mortality and a 31% increase in cardiopulmonary mortality for a 24.5 µg per cubic metre difference in PM<sub>2.5</sub>s. These results are highly significant and led the EPA to place regulatory limits on PM<sub>2.5</sub>s, establishing the National Ambient Air Quality Standards in 1997. These regulations were challenged by industry but ultimately upheld by the US Supreme Court<sup>29</sup> after the data from all the studies had been subjected to intense scrutiny including an extensive independent audit and a re-analysis of the original data<sup>30</sup>.

The health benefits of bringing in these new regulations have been estimated as \$32 billion annually<sup>31</sup> based on mortality and chronic and acute health effects, and a White House report from the Office of Management and Budget in September 2003 calculated the benefits in terms of reductions in hospitalizations, premature deaths and lost working days as between \$120 and \$193 billion over the last 10 years (see section 9.1). As this study looked at only three health indicators it is likely to underestimate the true benefits.

It follows from this data that incinerators and all other major sources of PM<sub>2.5</sub> particulates will generate substantial health costs as well as increasing mortality.

## **b) Further Studies**

An analysis published in 2002 of the Cancer Prevention II study participants linked the individual factors, pollution exposures and mortality data for approximately 500,000 adults as reported in the ACS study above, bringing the follow-up to 1998<sup>28</sup>. The report doubled the follow-up period and reported triple the number of deaths, a wider range of individual factors and more pollution data, concentrating on fine particles. Smoking remained the strongest factor associated with mortality, but fine particulate pollution remained significantly associated with all-cause, and cardiopulmonary mortality with average adjusted RRs of 1.06 and 1.09. In addition, after the longer follow-up period, fine particulates were significantly associated with lung cancer mortality with an adjusted RR of 1.14. The authors reported that exposure to a 10 µg per cubic metre higher level of PM<sub>2.5</sub>s was associated with a 14% increase in lung cancer and a 9% increase in cardiopulmonary disease<sup>28</sup>.

### **c) Cardiovascular Disease**

Researchers were surprised to find that the increased cardiopulmonary mortality associated with particulate pollution was primarily due to cardiovascular disease. This was found in both the Six City and ACS studies when they were re-analysed<sup>30</sup>. When the causes of death in the Cancer Prevention II Study were looked at in more detail<sup>32</sup> to look for clues to possible pathophysiological mechanisms, the link was strongest with ischaemic heart disease: a 10µg per cubic metre increase in PM<sub>2.5</sub>s was associated with an 18% increase in deaths from ischaemic heart disease (22% in never smokers). A more recent prospective study, the Women's Health Initiative (WHI), followed 65,893 postmenopausal women (initially free of cardiovascular disease) over 6 years, to examine the effects of the fine particulate pollution in the neighbourhood of each participant on the first cardiovascular or cerebrovascular incident and on mortality. The results for mortality and morbidity were consistent. Each increase of 10µg per cubic metre in fine particulate pollution was associated with a 76% increase in deaths from cardiovascular disease and an 83% increase in deaths from cerebrovascular disease<sup>33</sup>. The effect was independent of other variables but obese women and those who spent more time outdoors were more vulnerable to the effect. The WHI involved a more homogeneous study population and had a number of other methodological advantages over the earlier studies, resulting in greater sensitivity, and more reliable estimates. However, part of the greater effect in this study may be due to gender: there has been some evidence in other studies that women are more susceptible to the cardiovascular effects of fine particulates than men.

These results imply that the increase in fine particulate pollution associated with larger incinerators can be expected to increase mortality. It is probably safe to extrapolate from the WHI assuming that the effect on mortality in the WHI was genuine for women, and that the risk to men would be half as great. In that case, if the incinerator increased PM<sub>2.5</sub> particulates by as little as 1µg per cubic metre, cardiovascular mortality would be increased by 5-10%, with similarly increased cerebrovascular mortality.

Acute myocardial infarctions have been found to rise during episodes of high particulate pollution, doubling when levels of PM<sub>2.5</sub>s were 20-25µg per cubic metre higher<sup>34</sup>. Particulates also increased mortality from stroke<sup>35,36</sup>. One study concluded that 11% of strokes could be attributed to outdoor air pollution<sup>37</sup>. Episodes of increased particulate pollution also increased admissions with heart disease<sup>38</sup>. A recent study found that each 10µg per cubic metre rise in PM<sub>10</sub> particulates was associated with a 70% increase in DVT risk.<sup>39</sup> Mortality from diabetes<sup>27</sup> and admissions for diabetic heart disease are also increased<sup>40</sup> and these were double the non-diabetic CHD admissions, suggesting that diabetics were particularly vulnerable to the effect of particulate pollution<sup>40</sup>. Higher levels of particulates have been associated with life-threatening arrhythmias<sup>41</sup> exercise-induced ischaemia<sup>42</sup>, excess mortality from heart failure<sup>36,43</sup> and thrombotic disease<sup>36</sup>.

### **d) Effect on Children and the Foetus**

Particulates carry various chemicals including polycyclic aromatic hydrocarbons (PAHs) into the human body. Frederica Perera from the Columbia Center for Children's Environmental Health has found that the foetus is 10 times

more vulnerable to damage by these substances<sup>44</sup>. She also found that PM<sub>2.5</sub> particulates have an adverse effect on the developing foetus with significant reductions in weight, length and head circumference and reiterated the importance of reducing ambient fine particulate concentrations<sup>45</sup>. In addition further studies have shown an adverse effect on foetal development at levels currently found in cities today, such as New York<sup>46</sup>. Air pollution has been found to cause irreversible genetic mutations in mice. Researchers found, in contrast, that if mice breathed air which had been freed of particulates by filtration they developed only background levels of genetic mutations, confirming that particulates were causative<sup>47</sup>. At the fourth Ministerial Conference of Environment and Health in June 2004, the WHO announced that between 1.8 and 6.4% of deaths in the age group from 0 to 4 could be attributed to air pollution<sup>48</sup>.

#### e) Acute Respiratory Incidents

Elevated particulate air pollution has been associated with increased hospital admissions with asthma<sup>24</sup> and with COPD<sup>49</sup>, increases in respiratory symptoms<sup>50,51</sup>, higher incidence of asthma<sup>52</sup>, reduced immunity<sup>53,54</sup>, higher rates of ear, nose and throat infection<sup>52</sup>, loss of time from school in children through respiratory disease<sup>55,56</sup>, and declines of respiratory function<sup>57-59</sup>. A sad aside to the above is that children who did more outdoor sport had greater declines in respiratory function<sup>59</sup>. We are doing a great disservice to our children if they cannot pursue healthy activities without damaging their health.

#### f) Mortality from Particulate Pollution

Episodes of increased particulate pollution have been associated with increased cardiovascular mortality<sup>19,20,27,28,36,43,60</sup> and increased respiratory mortality<sup>43,44</sup>. About 150 time-series studies around the world have shown transient increases in mortality with increases in particulates. Cohort studies have shown a long-term effect on mortality<sup>19,20,28</sup> (see section 3.1a).

Can we quantify this mortality? It has been estimated that the increased mortality works out as about a 0.5-1% increase in mortality for each 10µg per cubic metre rise in PM<sub>10</sub><sup>61</sup> for acute exposures and a 3.5% rise for chronic exposures<sup>31</sup>. For PM<sub>2.5</sub>s the increase in mortality is much greater, especially for cardiopulmonary mortality (see Table).

**Table 1 Cardiopulmonary Mortality and Fine Particulate Pollution**

Study	Reference & Year	No of Participants	Follow up	Adjusted excess c/p mortality	Difference in PM <sub>2.5</sub> s in µg/m <sup>3</sup>	Adjusted excess c/p mortality for rise of 10µg/m <sup>3</sup>
Six Cities	<sup>19</sup> 1993	8,111	1974-1991	37%	18.6	19.8%
ACS Cancer Prevention II	<sup>20</sup> 1995	552,138	1982-1989	31%	24.5	12.7%
Cancer Prevention II	<sup>28</sup> 2002	500,000	1982-1998	9%	10	9%

Women's Health Initiative	<sup>33</sup> 2007	65,893	1994-2002	76%	10	76%
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When the data from the Six Cities Study and the ACS study were subject to audit and re-analysis (see section 3.1a) the cardiopulmonary deaths were separated into pulmonary and cardiovascular<sup>30</sup>. Unexpectedly most of the excess deaths due to particulates had been from cardiovascular causes. This was apparent in each of the analyses performed giving figures for the increase in cardiovascular mortality in the Six Cities study of between 35% and 44% for an 18.6 µg per cubic metre difference in PM<sub>2.5</sub>s and in the ACS study between 33% and 47% for a 24.5µg per cubic metre. This was much higher in each case than the increase in respiratory deaths of 7%. In the ACS data it was later found that the excess cardiovascular deaths were primarily due to an 18% increase in deaths from ischaemic heart disease for each 10µg per cubic metre rise in PM<sub>2.5</sub>s<sup>32</sup>. The Women's Health Initiative study has demonstrated an even stronger statistical relationship between raised levels of fine particulates and cardiovascular deaths with a 76% increase in cardiovascular mortality for each 10µg per cubic metre increase in PM<sub>2.5</sub> particulates, and this depended not just on which city a woman lived in but in which part of that city<sup>33</sup>. This study, more than any other, demonstrates the great dangers posed by fine particulates and the highlights the urgent need to remove major sources of these pollutants.

As incinerators selectively emit smaller particulates and cause a greater effect on levels of PM<sub>2.5</sub>s than PM<sub>10</sub>s, they would therefore be expected to have a significant impact on cardiopulmonary mortality, especially cardiovascular mortality. This has not so far been studied directly.

#### **g) Studies Involving Ultrafine Particles**

Ultrafine particles (0.1µg per cubic metre and below) are produced in great numbers by incinerators<sup>1</sup>. They have been less studied than PM<sub>2.5</sub> and PM<sub>10</sub> particulates but there has been enough data available for the WHO to conclude that they produce health effects immediately, after a time lag and in association with cumulative exposure. They have been found to have a more marked effect on cardiovascular mortality than fine particulates, with a time lag of 4-5 days<sup>62</sup>. Stroke mortality has been positively associated with current and previous day levels of ultrafine particulates and this has occurred in an area of low pollution suggesting there may be no threshold for this effect<sup>63</sup>. Ultrafine particulates have also been reported to be more potent than other particulates on a per mass basis in inducing oxidative stress in cells<sup>64</sup> and they have the ability to cross the blood-brain barrier and lodge in brain tissue<sup>65</sup>. They represent another largely unknown and unexplored danger of incineration.

#### **h) Assessment by the WHO and Other Authorities**

Based on the World Health Organisation Air Quality Guidelines<sup>66</sup> we have estimated that a 1µg per cubic metre increase in PM<sub>2.5</sub> particulates (a very conservative estimate of the level of increase that would be expected around large incinerators) would lead to a reduced life expectancy of 40 days per person over 15 years (this equals a reduction of life expectancy of 1.1 years for each 10µg per cubic metre increase in PM<sub>2.5</sub> particulates). Although this figure appears small they note that

the public health implications are large and the effect on a typical population of 250,000 surrounding an incinerator would be a loss of 27,500 years of life over a 15 year time period. This figure gives an indication of the likely loss of life from any major source of PM<sub>2.5</sub> particulates. In addition, incinerators normally operate for much longer periods than the 15 years quoted here. Note that the estimated loss of life here is likely to be an underestimate as it is from particulates alone and not from other toxic substances.

The European Respiratory Society<sup>67</sup> has published its concern about the mismatch between European Union policy and the best scientific evidence. They state that a reduction in the yearly average PM<sub>2.5</sub> particulates to 15µg per cubic metre \* would result in life expectancy gains, at age 30, of between 1 month and 2 years. They point out that the benefits of implementing stringent air pollution legislation would outweigh the costs. These recommendations are sensible and based on sound science. A programme of building incinerators would unfortunately achieve the opposite: they would increase particulate pollution, reduce life expectancy and would be at odds with the best science.

Statements by leading researchers include the following: *“the magnitude of the association between fine particles and mortality suggests that controlling fine particles would result in saving thousands of early deaths each year”* (Schwartz)<sup>61</sup> and *“there is consistent evidence that fine particulates are associated with increased all cause, cardiac and respiratory mortality. These findings strengthen the case for controlling the levels of respiratory particulates in outdoor air”*<sup>60</sup>.

\* The National Ambient Air Quality Standard for PM<sub>2.5</sub> particulates was introduced into the USA in 1997 with a mean annual limit of 15µg per cubic metre. This had measurable health benefits. An annual mean limit for PM<sub>2.5</sub> particulates is to be introduced into Scotland in 2010 and this will be 12µg per cubic metre. An annual mean target for PM<sub>2.5</sub> particulates is to be introduced into the UK in 2020 and this will be 25µg per cubic metre. Many will wonder why the difference is so vast when the science is the same.

### **i) Summary**

In summary there is now robust scientific evidence on the dangers to health of fine particulates and of the substantial health costs involved. Recent studies have shown the risk to be considerably greater than previously thought. For these reasons it is impossible to justify increasing levels of these particulates still further by building incinerators or any other major source of PM<sub>2.5</sub> particulates. The data makes it quite clear that attempts should be made to reduce levels of these particulates whenever possible. However particulates are not the only reasons to be concerned about incinerators. There are other dangers:-

## **3.2 Heavy Metals**

Pope reported that hospital admissions of children with respiratory disease fell dramatically in the Utah valley when a steel mill was closed for a year due to a strike. Air pollution analysis showed that the metal content of particulates was lower that year and that the type of inflammation found in the lungs while the steel mill was working could be reproduced in both rat and human lung tissue by using air pollutants of the type emitted by the steel mill<sup>68,69</sup>. This is a very clear illustration of the dangers of pollution of the air with heavy metals. Exposure to inhaled metals, similar to the type produced by incinerators, have been shown to mediate cardiopulmonary injury in rats<sup>70</sup> and small amounts of metal (<1%) in particulates are known to cause pulmonary toxicity<sup>71</sup>. Salts of heavy metals such as iron and copper act as catalysts for dioxin

formation causing rapid rates of dioxin formation<sup>72</sup> increasing the dangers from burning metals.

Incinerator emissions to air and ash contain over 35 metals<sup>73</sup>. Several are known or suspected carcinogens. Toxic metals accumulate in the body with increasing age<sup>74</sup>. Breathing in air containing toxic metals leads to bioaccumulation in the human body. They can remain in the body for years: cadmium has a 30 year half-life. Incineration adds to the burden of toxic metals and can lead to further damage to health.

Mercury is a gas at incineration temperatures and cannot be removed by the filters. Incinerators have been a major source of mercury release into the environment. In theory mercury can be removed using activated carbon but in practice it is difficult to control and, even when effective, the mercury ends up in the fly ash to be landfilled. Mercury is one of the most dangerous heavy metals. It is neurotoxic and has been implicated in Alzheimer's disease<sup>75-77</sup>, learning disabilities and hyperactivity<sup>78,79</sup>. Recent studies have found a significant increase in both autism and in rates of special education students around sites where mercury is released into the environment<sup>80,81</sup>.

Inhalation of heavy metals such as nickel, beryllium, chromium, cadmium and arsenic increases the risk of lung cancer<sup>12</sup>. Cumulative exposure to cadmium has been correlated with lung cancer<sup>82</sup>. Supportive evidence comes from Blot and Fraumeni who found an excess of lung cancer in US counties where there was smelting and refining of non-ferrous metals<sup>83</sup>. Inhaled cadmium also correlates with ischaemic heart disease<sup>84</sup>.

So what are the dangers caused by toxic metals accumulating in the body? They have been implicated in a range of emotional and behavioural problems in children including autism<sup>85</sup>, dyslexia<sup>86</sup>, impulsive behaviour<sup>87</sup> attention deficit and hyperactivity disorder (ADHD)<sup>88,89</sup> as well as learning difficulties<sup>14,78,90-93</sup>, lowered intelligence<sup>89</sup> and delinquency<sup>94,89</sup>, although not every study reached standard significance levels. Many of these problems were noted in the study of the population round the Sint Niklaas incinerator<sup>95</sup>. Exposed adults have also been shown to be affected, showing higher levels of violence<sup>13,96</sup>, dementia<sup>97-103</sup> and depression than non-exposed individuals. Heavy metal toxicity has also been implicated in Parkinson's disease<sup>104</sup>.

Heavy metals emitted from incinerators are usually monitored at 3 to 12 monthly intervals in the stack: this is clearly inadequate for substances with this degree of toxicity.

### **3.3 Nitrogen Oxides and Ozone**

Nitrogen dioxide is another pollutant produced by incinerators. It has caused a variety of effects, primarily on the lung but also on the spleen, liver and blood in animal studies. Both reversible and irreversible effects on the lung have been noted. Children between the ages of 5 and 12 years have been estimated to have a 20% increase in respiratory symptoms for each 28 µg per cubic metre increase in nitrogen dioxide. Studies in Japan showed a higher incidence of asthma with increasing NO<sub>2</sub> levels and that it synergistically increases lung cancer mortality rates<sup>41</sup>. It has also been reported to aid the spread of tumours<sup>105,106</sup>. Increases in NO<sub>2</sub> have been associated with rises in admissions with COPD<sup>107</sup>, asthma in children and in heart disease in those over 65<sup>18</sup>. Other studies have shown increases in asthma admissions<sup>108</sup> and increased mortality with rising NO<sub>2</sub> levels<sup>109</sup>.

Rising ozone levels have led to increasing hospital admissions, asthma and respiratory inflammation and have been reported to lower immunity<sup>110</sup>. Higher levels have been significantly associated with increased mortality<sup>111</sup> and with cardiovascular disease. Both ozone and nitrogen dioxide are associated with increasing admissions with COPD<sup>107</sup>

When it comes to incinerator emissions the health effects of nitrous oxides are likely to compound the negative health effects of particulates

### **3.4 Organic Toxicants**

Hundreds of chemical compounds are released from incinerators. They include a host of chemicals produced from the burning of plastic and similar substances and include polycyclic aromatic hydrocarbons (PAHs), brominated flame retardants, polychlorinated biphenols (PCBs), dioxins, polychlorinated dibenzofurans (furans). These substances are lipophilic and accumulate in fatty tissue and remain active in the living organisms and the environment for many years. They have been linked with early puberty<sup>112</sup>, endometriosis<sup>113</sup>, breast cancer<sup>114,115</sup>, reduced sperm counts<sup>116</sup> and other disorders of male reproductive tissues<sup>117</sup>, testicular cancer<sup>118</sup> and thyroid disruption<sup>11</sup>. It has been claimed that about 10% of man-made chemicals are carcinogenic (see section 5.1), and many are now recognised as endocrine disrupters. Most of these health effects were not anticipated and are only now being recognised. No safety data exist on many of the compounds released by incinerators.

PAHs are an example of organic toxicants. Although emission levels are small these substances are toxic at parts per billion or even parts per trillion<sup>73</sup> as opposed to parts per million for many other pollutants. They can cause cancer, immune changes, lung and liver damage, retarded cognitive and motor development, lowered birth weight and lowered growth rate<sup>73</sup>.

#### **a) Organochlorines**

The most detailed analysis to date on incinerator emissions has identified several hundred products of incomplete combustion (PICs) including 38 organochlorines – but 58% of the total mass of PICs remained unidentified<sup>119</sup>. Organochlorines, which include dioxins, furans and PCBs, deserve special attention, because of their known toxicity, because they bioaccumulate, and because of the likelihood that they will increase in the waste stream. Their major precursor, PVC, presently makes up 80% of organically bound chlorine and the amount of PVC in waste is likely to increase significantly in the future<sup>120</sup>. Clearly organochlorines will be an important component of incinerator emissions.

Organochlorines as a group are associated with six distinct types of health impact and these often occur at low concentrations. They are associated with 1) reproductive impairment in males and females 2) developmental damage 3) impaired cognitive ability and behaviour 4) neurological damage 5) suppressed immunity and 6) hormonal disruption and hormonal cancers. Each of these six effects has been demonstrated in three separate fields: in humans, in laboratory animals and in wildlife<sup>121</sup>. The American Public Health Association (APHA) concluded “virtually all organochlorines that have been studied exhibit at least one of a range of serious toxic effects, such as endocrine disruption, developmental impairment, birth defects, reproductive dysfunction and infertility, immunosuppression and cancer, often at extremely low doses”<sup>122</sup>. Other organohalogens such as bromides and fluorides have many similar properties.

A common misconception is that these pollutants have little effect if dispersed into the environment. This is wrong for several reasons. Firstly they are persistent as there is no mechanism in the environment to break them down and so they accumulate. Secondly as they are fat soluble they concentrate in living matter, often dramatically, at progressively higher concentrations (bioaccumulation). For example dioxin has been found in fish at levels 159,000 times that found in the water<sup>123</sup>; PCBs have been found in North Pacific Dolphins at 13 million times the concentration in the water<sup>124</sup> and trichloroacetic acid is found in North European conifers at 3-10,000 times that in the ambient air<sup>125</sup>. Thirdly they are concentrated by the foetus so a typical polar bear cub has a body burden double that of its mother<sup>126</sup> and at a level known to cause reproductive failure, altered brain development and immune suppression<sup>127</sup>. Fourthly they are nearly all toxic. In short the ability of ecosystems to assimilate organochlorines and other persistent bioaccumulative compounds is close to zero and they should simply never be released into the environment.

## **b) Dioxins**

Dioxins are the organochlorines compounds most associated with incinerators and inventories have consistently shown that incinerators are the major source of emissions of dioxins into the air<sup>128-30</sup> though these are decreasing\*. Dioxin releases over the last few decades have caused widespread contamination of food, significant toxic body burdens in nearly all human beings and severe pollution of the Arctic. None of this was foreseen. The damage already done by incinerators has been incalculable.

Eighteen separate assessments of dioxin's carcinogenicity have involved five different routes of exposure, five different species, low and high doses and long or short exposure times. In *every* case dioxins have caused cancer, involving nine different types of cancer, including lymphomas, cancers of the lung, liver, skin, soft tissue and of the oral and nasal cavities<sup>131</sup>. The National Institute of Environmental Health have looked for, but been unable to find, any threshold for the toxicity of dioxin. At the lowest detectable concentrations it can induce target genes and activate a cascade of intracellular molecular effects and can promote pre-malignant liver tumours and disrupt hormones<sup>132</sup>. Even doses as low as 2.5 parts per quadrillion can stop cultured cells from showing changes characteristic of immune responses<sup>133</sup>.

The US Environmental Protection Agency's current estimate of dioxin's carcinogenicity, derived from animal studies, is that the average person's exposure to dioxin, which is 3-6 picogram per kilogram per day\*\* gives a lifetime cancer risk of between 500 and 1000 per million<sup>134</sup>. (An acceptable cancer risk is considered to be between 1 in a million and 1 in 100,000). In comparison, a German study<sup>135</sup>, derived from human dioxin exposure, found that each additional unit dose of dioxin (one picogram per kilogram of body weight per day) is associated with an increase in lifetime cancer risk of between 1000 and 10,000 per million.

The average infant receives doses of dioxins of 60-80 picograms (TEQ) per kilogram per day<sup>136,137</sup> which is 10- 20 times higher than those of the average adult and exceeds by a factor of 6 – 10,000 every government in the world's acceptable daily intake.\*\*\* This dioxin intake in the first year has been calculated to pose a cancer risk to the average infant of 187 per million (187 times the acceptable level)<sup>138</sup>.

All these figures demonstrate that dioxins already in the environment are at unacceptable levels and are likely to be causing up to 6% of all cancers and to be having a range of adverse impacts on health including subtle effects.



Rats given dioxin to produce a body burden of dioxin at about half the average in the human population had male offspring whose sperm count was reduced by 25%<sup>139</sup> and rhesus monkeys given dioxin equivalent to twice the average human body burden had increased foetal death in their offspring and cognitive impairment which was transgenerational (passed on to their offspring) and abnormally aggressive behaviour<sup>140,141</sup>. This data indicates that releasing even a small amount of dioxin into an already overloaded environment can simply not be justified.

\*An assessment of dioxins by the European Dioxin Inventory in 2005 found that in the UK, the biggest single source of dioxins in 2000 and in 2005 (projected figure) was the incineration of municipal waste, producing 20 times as much dioxin as road transport<sup>142</sup>.

\*\* a picogram is 1,000,000,000,000 gram, ie. a billionth of a gram in the UK, but more typically described in US literature as a trillionth of a gram.

\*\*\* Tolerable daily intake (TDI) is set at 0.006 picograms/kg per day in the US and 2 picograms/kg per day in the UK.

### 3.5 Effects on Genetic Material

Both heavy metals and many chemicals form covalent bonds with DNA called DNA adducts. This can increase the risk of cancer by activating oncogenes and blocking anti-tumour genes. This raises a very serious concern. This concern is that by releasing chemicals into the environment we may not only be poisoning this generation but the next. Carcinogenesis from chemicals being passed on through several generations is not just a horrifying scenario but has been demonstrated to occur in animals<sup>143,144</sup>. Incinerator emissions would greatly increase this risk.

DNA adducts to PAHs increase with exposure to pollution and patients with lung cancer have higher levels of adducts (see below). This is one demonstration of how pollutants alter genes and predispose to cancer. Other chemicals, such as vinyl chloride interfere with DNA repair and yet others such as organochlorines are tumour promoters.

### 3.6 Effects on the Immune System

Starting in the late 1980s a series of dramatic marine epidemics killed off thousands of dolphins, seals and porpoises. Many were found to have been affected by a distemper-like virus. Autopsies of the dead animals showed weakened immune systems and high levels of pollutants including PCBs and synthetic chemicals. A virologist, Albert Osterhaus and his co-workers, demonstrated that when seals were fed contaminated fish containing organochlorines (which were, however, considered fit for human consumption) they developed immune suppression and were unable to fight viruses<sup>145-7</sup>. Their natural killer cells were 20-50% below normal and their T cell response dropped by 25-60%. The immune suppression was due to dioxin-like chemicals, PCBs and synthetic chemicals. An immunologist Garet Lahvis found immunity in dolphins in the USA dropped as PCBs and DDT increased in their blood<sup>148</sup>. The immune system appeared most vulnerable during prenatal development. This demonstrates that the immune system may be damaged by exposure to synthetic chemicals and that we have seriously underestimated the dangers of these chemicals.

Animal experiments have shown immunotoxicity with heavy metals, organochlorine pesticides and halogenated aromatics<sup>149</sup> and accidental exposure data on humans has shown immunotoxicity with PBBs, dioxins and aldicarb. In fact whole volumes have been written on immunotoxicity<sup>150</sup>. Note these are the type of pollutants released by incinerators. Environmental toxins have been shown to decrease T-lymphocyte helper-suppressor ratios in four different exposed populations<sup>151</sup>. Nitrogen dioxide exposure leads to abnormally elevated immune and allergic responses. PM<sub>2.5</sub>

particulates themselves can cause mutagenic and cytotoxic effects and the smallest particulates cause the greatest effects<sup>152</sup>.

In utero exposure to dioxins results in thymus atrophy and weakened immune defences<sup>153</sup>. When female rhesus monkeys were exposed to PCBs at very low levels producing a body burden typical of general human population, their offspring's ability to mount a defence against foreign proteins was permanently compromised<sup>154</sup>.

In summary there is abundant evidence that a large number of the pollutants emitted by incinerators can cause damage to the immune system<sup>155</sup>. As is demonstrated in the next section the combination of these is likely to have an even more potent and damaging effect on immunity than any one pollutant in isolation.

### **3.7 Synergistic Effects**

Various studies have shown that a combination of substances can cause toxicity even when the individual chemicals are at a level normally considered safe. The report "Man's Impact on the Global Environment" by the Massachusetts Institute of Technology stated "synergistic effects among chemical pollutants are more often present than not"<sup>156</sup>. Testing has been minimal and most of the synergistic effects are likely to remain unknown. Toxicologist Prof Vyvyan Howard has calculated that to test just the commonest 1,000 toxic chemicals in unique combinations of three would require 166 million different experiments and even this would disregard varying doses<sup>157</sup>.

Synergy has been demonstrated when organic chemicals are combined with heavy metals,<sup>158,159</sup> and with combinations of pesticides<sup>160,161</sup> and food additives<sup>162</sup>. The last study is of particular concern. Rats fed with one additive were unharmed. Those fed two developed a variety of symptoms whereas those fed all three all died within two weeks. In this case the chemicals appeared to amplify each other's toxicity in logarithmic fashion. In a recent experiment scientists dosed animals with a mixture of 16 organochlorine pesticides, lead and cadmium at "safe levels" and found they developed impaired immune responses, altered thyroid function and altered brain development<sup>163</sup>. Another study in 1996, published in *Science*, reported on the dangers of combinations of pesticides and their ability to mimic oestrogen. They found that combinations could increase the toxicity by 500 to 1000 times<sup>164</sup>. Mice exposed to 25 common groundwater pollutants, all at levels well below those that produce any effects in isolation, developed severe immunosuppression<sup>165</sup>. The level of concern about the multiplicity of pollutants released into the air by incinerators is enhanced by the fact that even when the probable effects of the single pollutants involved are known, no one has any idea what damage the combinations can cause.

The population living round an incinerator is being exposed to multiple chemical carcinogens, and to fine particulates, to carcinogenic heavy metals (in particular cadmium) and in some cases to radioactive particles, all known to increase lung cancer. Nitrogen dioxide has also been shown to synergistically increase lung cancer. When all these are combined, the effects are likely to be more potent, and, in fact, an increase in the incidence of lung cancer has been reported around incinerators (see section 4.1).

The potential for multiple pollutants to cause other serious health effects is illustrated by the results of a key study on rats exposed to the dust, soil and air from a landfill site. These animals developed abnormal changes in the liver, thyroid and reproductive organs within only two days of exposure<sup>166</sup>. Although effects in animals do not always mimic those in humans, the authors concluded that present methods of

calculating health risks underestimate the biological effects. This has obvious relevance to the dangers of exposing people to multiple pollutants from incinerators.

## **4. Increased Morbidity and Mortality near Incinerators**

### **4.1 Cancer**

There have been a number of studies of the effect of incinerators on the health of the surrounding population, mainly concentrating on cancer incidence. In most studies, the incinerators were situated near other sources of pollution and often in areas of deprivation, both likely to confound the findings since both are associated with higher cancer incidence. The study of an incinerator burning 55,000 tonnes of waste a year and built in 1977 in the middle of a residential area of a town of 140,000 with no heavy industry (Sint Niklaas) is scientifically unsatisfactory because funds were not made available for the study of controls<sup>95</sup>. However, the investigators mapped a convincing cluster of 38 cancer deaths immediately surrounding and to leeward of the incinerator, and this area also showed high concentrations of dioxin in soil samples when tested in 1992. They noted that the cancer SMR for this town for 1994-1996 (national statistics) was high (112.08 for males and 105.32 for females), supporting the genuine nature of their findings.

In 1996, Elliott et al. published a major study<sup>167</sup> in which they compared the numbers of registered cancer cases within 3 km and within 7.5 km of the 72 municipal waste incinerator sites in the UK with the number of cases expected. It involved data on over 14 million people for up to 13 years. Expected numbers were calculated from national registrations, adjusted for unemployment, overcrowding and social class. No account was taken of prevailing winds, or of differences between incinerators. They first studied a sample of 20 of the incinerator sites, replicating the analysis later with the other 52. If the results of two sets like this concur, it strengthens the data. In each set there was an excess of all cancers near the incinerators, and excesses separately of stomach, colorectal, liver and lung cancers, but not leukaemias. The first set gave adjusted mortality ratios for all cancers of 1.08 for within 3km and 1.05 within 7.5 km; for the second these were 1.04 and 1.02. These risks, representing an additional risk of 8% and 5% for the first set and 4% and 2% for the second, seem small **but represented a total of over 11,000 extra cancer deaths near incinerators** and were highly significant ( $p < 0.001$  for each).

For each of the main cancer sites the excesses were higher for those living within 3 km than for all within 7.5 km<sup>167,168</sup>, suggesting that the incinerators had caused the excess. The authors doubted this and attributed the findings to additional confounding in spite of the fact that they had already adjusted (possibly over-adjusted) for unemployment, overcrowding and social class, which give a partial correction for pollution. Moreover, the effect on people living to leeward of the incinerator would be substantially higher than shown by this study as the true number of people affected was diluted by those living at the same distance but away from the wind plume coming from the incinerator.

Knox et al. looked at the data from 22,458 children who died of cancer between 1953 and 1980 in the UK<sup>169</sup>. For each child they compared the distance of the

birth and death addresses from the nearest source of pollution and found a consistent asymmetry: more had moved away from the nearest hazard than towards it<sup>169</sup>. They deduced that the excess of migrations away from the hazard (after allowing for social factors) was evidence that the children had been affected by the cancer-causing pollution before or shortly after birth.

Later they applied the method to the set of incinerators studied by Elliott et al. and again showed the same asymmetry in the children's birth and death addresses, indicating that the incinerators had posed a cancer risk to children<sup>170</sup>. Of the 9,224 children for whom they had found accurate birth and death addresses, 4,385 children had moved at least 0.1 km. Significantly, more children had migrated away from incinerators than towards. For all those who had at least one address within 3 km of an incinerator, the ratio was 1.27. When they limited the analysis to children with one address inside a 5 km radius from the nearest incinerator and the other address outside this radius the ratio was 2.01; this indicated a doubling of cancer risk. Both these findings were highly significant ( $p < 0.001$  for each). The excess had only occurred during the operational period of each incinerator and was also noted round hospital incinerators but not landfill sites. This is strong evidence that the incinerators' emissions contributed to the children's cancer deaths.

Biggeri et al. in 1996 compared 755 lung cancer deaths in Trieste with controls in relation to smoking, probable occupational exposure to carcinogens and air pollution (measured nearest to their homes) and the distance of their home from each of four pollution sites. The city centre carried a risk of lung cancer but the strongest correlation was with the incinerator where they found a 6.7 excess of lung cancer after allowing for individual risk factors<sup>171</sup>.

Using a spatial scan statistic, Viel et al 2000 looked at the incidence of soft tissue sarcoma and non-Hodgkin's lymphoma from French Cancer Registry data, in two areas close to an incinerator with high emission of dioxin<sup>172</sup>. They found highly significant clusters of soft tissue sarcoma (RR 1.44) and of non-Hodgkins lymphoma (RR 1.27) but no clusters of Hodgkins disease (used as negative control). This study was interesting in that it was designed to look both in a focussed way at the area round the incinerator, and to check the association by looking for space time relationships which should be present if the relationship was causal. In addition they looked in an unfocussed way for other clusters in the wider area which contained other areas of deprivation. Both the first two analyses were positive close to the incinerator - demonstrating that a causal relationship was likely - and since no other clusters were found they concluded that deprivation could be virtually excluded as a factor.

According to Ohta et al, Japan built 73% of all the municipal waste incinerators in the world and by 1997 had become very concerned about their health effects: in the village of Shintone, 42% of all deaths between 1985-95 in the area up to 1.2 km to leeward of an incinerator (built in 1971) were due to cancer, compared to 20% further away and 25% overall in the local prefecture<sup>173</sup>. Their data on soil contamination reinforced the importance of considering wind directions in evaluating the health effects of incinerators.

Comba found an increased incidence of soft tissue sarcoma in an Italian population living within 2 km of an incinerator<sup>174</sup>. Zambon et al looked at cases of sarcoma from a different perspective. They calculated dioxin exposure from incinerators and other industrial sources in patients with sarcoma using a dispersion model and found the risk of sarcoma increased with the extent and duration of exposure to dioxin<sup>175</sup>.

In 1989 Gustavsson reported a twofold increase in lung cancer in incinerator workers in Sweden compared to the expected local rate<sup>176</sup>. In 1993 he reported a 1.5 fold increase in oesophageal cancer in combustion workers, including those working in incinerators<sup>177</sup>.

## 4.2 Birth Defects

There have been five reports of increases in congenital abnormalities around incinerators. The investigators at Sint Niklaas noted multiple birth defects to leeward of the incinerator<sup>95</sup>. Orofacial defects and other midline defects were found to be more than doubled near an incinerator in Zeeburg, Amsterdam<sup>178</sup>. Most of these deformed babies were born in an area corresponding to wind-flow from the incinerator and other defects included hypospadias and spina bifida. In the Neerland area, Belgium, there was a 26% increase in congenital anomalies in an area situated between two incinerators<sup>179</sup>. A study of incinerators in France has shown chromosomal defects and other major anomalies (facial clefts, megacolon, renal dysplasias)<sup>180</sup>. A recent British study looked at births in Cumbria between 1956 and 1993 and reported significantly increased lethal birth defects around incinerators after adjusting for year of birth, social class, birth order, and multiple births. The odds ratio for spina bifida was 1.17 and that for heart defects 1.12. There was also an increased risk of stillbirth and anencephalus around crematoriums<sup>181</sup>. The study pointed out that the figures for birth defects are likely to be substantial underestimates since they do not include spontaneous or therapeutic abortions, both increased by foetal anomalies.

In addition, several studies have noted an increase in birth defects near waste sites, particularly hazardous waste sites. The pattern of abnormalities was similar to the pattern found with incinerators, with neural tube defects often being the most frequent abnormality found, with cardiac defects second<sup>182-85</sup>. Harmful chemicals are normally stored in fatty tissue: in the foetus there is little or no fatty tissue except for that in the brain and nervous system, which may explain the pattern of damage. A review of this subject stated *“the weight of evidence points to an association between residential proximity to hazardous waste site and adverse reproductive outcomes.”*<sup>186</sup>

## 4.3 Ischaemic Heart Disease

Gustavsson found an excess of ischaemic heart disease<sup>176</sup> in incinerator workers who had been exposed for longer. We have not found any epidemiological studies of cardiovascular disease in the neighbourhood of incinerators, but in view of the research on particulates (see section 3.1) this should be investigated.

## 4.4 Comment

The authors of some of these reports did not consider that they had sufficient grounds for concluding that the health effects round incinerators were *caused* by pollution from the incinerators. However, statistically their findings were highly significant and, taking the studies together, it is difficult to believe that all their results could have been due to unrecognised confounding variables. This is even less likely when you consider the nature of the pollutants released from incinerators and the scientific evidence for the health effects of those compounds (see sections 2 and 3). The concordance of increased cancer incidence in local areas demonstrated to be more polluted also points to a causal association, although it does not necessarily imply that the pollutant measured contributed to the increase.

The studies may have underestimated the risks. At 13 years, the follow-up period of the large British study was probably too short: at Sint Niklaas adult cancer cases seemed to increase from 13 years onward (although children's cancers occurred earlier), and in Japan, Ohta noted that cancer caused 42% of all deaths in the lee of incinerators from 14 to 24 years after the incinerator was commissioned<sup>173</sup>. The reported risks were higher in the studies in which allowance was made for the direction of prevailing winds, possibly because of dilution elsewhere by relatively unexposed persons.

The studies reviewed apply to the older incinerators: newer incinerators may have better filters but fine particulates and metals are incompletely removed. Since some of these pollutants, notably fine particulates, do not appear to have a safe threshold, it is clearly incorrect to claim that incinerators are safe. The higher quantity of toxic fly ash produced by modern incinerators, which is easily wind-borne, represents an additional hazard. Even if incinerators were equipped with perfect filters, their huge size and tendency to faults means that the risk of intermittent high levels of pollution is a real concern.

Taking into account these results and the difficulty in identifying causes of cancers and other chronic diseases, it is a matter of considerable concern that incinerators have been introduced without a comprehensive system to study their health effects, and that further incinerators are being planned without comprehensive monitoring either of emissions or of the health of the local population.

## **5. Disease Incidence and Pollution**

### **5.1 Cancer**

Studies linking cancer with incinerators cannot be seen in isolation. It is important to obtain an overall picture and look at other studies which link pollutants with cancer. And there is another aspect to this. Many types of cancer, including lung, pancreatic and stomach cancer, have a very poor prognosis and our only hope lies in prevention. Prevention means reducing our exposure to carcinogenic substances and we should take every opportunity to do this.

Cancer has shown an unrelenting rise over the last century, and is affecting younger people. The rise has been gradual, steady and real. Cancer incidence has been increasing by 1% per annum with an age standardized increase in mortality of 43% between 1950 and 1988<sup>187</sup>. Put another way, the chance of dying from cancer at the turn of the 20<sup>th</sup> century was 1 in 33. It is now 1 in 4. WHO data has demonstrated that 80% of cancers are due to environmental influences,<sup>188</sup> and evidence from migrant studies confirms that it is mainly the environment rather than the genes that determine the cancer risk<sup>188</sup>.

Many people have noted that the rise in cancer has paralleled the rise in the production and use of synthetic chemicals, all the more remarkable since there has been a simultaneous large drop in smoking in males in many countries. In the second half of the twentieth century synthetic chemical production doubled every 7 to 8 years with a 100 fold increase over the last 2 generations<sup>189</sup>. Many converging pieces of evidence link chemicals to the relentless rise of cancer.

#### **a) Links between exposure to pollutants and cancer in man**

- Cancer is commonest in industrialised countries with 50% of cases in the industrialised 20% of the world<sup>190</sup> and the WHO has noted that cancer incidence rises with the GNP of a country.
- There is the same correlation within countries. The highest mortality from cancer in the USA is in areas of highest industrialised activity. There is also a correlation in the USA between cancer incidence and the number of waste sites in the county<sup>191,192</sup>. Counties with facilities for treating toxic waste have four times as much breast cancer<sup>193</sup>. Cancer is also commoner in counties with chemical industries<sup>194</sup>. Public Data Access in the USA shows a close correlation between cancer mortality and environmental contamination<sup>195</sup>.
- Numerous studies have shown higher cancer incidence in both industrial workers and in populations living in polluted areas.<sup>196,197</sup>
- One of the three most rapidly rising cancers, non-Hodgkin's lymphoma, has been clearly linked with exposure to certain chemicals (for instance phenoxyherbicides and chlorophenols).<sup>198,199</sup>

#### **b) Links between exposure to pollutants and cancer in animals**

Three decades of studies of cancers in wildlife have shown that these are intimately associated with environmental contamination. This is particularly important as animals do not smoke, drink or eat junk food and cannot be accused of living in deprived areas. This strengthens the long-suspected link between environmental pollution and cancer. In a recent study of outbreaks of liver cancer in 16 different species of fish at 25 different sites, cancers were always associated with environmental contamination<sup>200</sup>. Dogs have been found to have higher rates of bladder cancer in industrialised counties in the USA<sup>201</sup>. It is inconceivable that we are not affected in the same way. Furthermore cancer rates in animals rapidly decline when the pollutants are removed showing the critical importance of an uncontaminated environment for good health.<sup>202</sup>

#### **c) Large increases in cancer in certain tissues**

Steep rises in cancer have occurred in tissues directly exposed to the environment: the lung and skin. But some of the steepest rises have occurred in parts of the body with high fat content, including cancers of the brain, breast, bone marrow and liver. This again points to toxic chemicals which are predominantly stored in the fatty tissues.

#### **d) Genetic mutation**

Many chemicals are known to attach to DNA causing genetic change in the form of DNA adducts. The research of molecular epidemiologist, Dr Frederica Perera, of Columbia Centre for Children's Environmental Health, has shown consistent associations between exposures to pollution and DNA adduct formation on the one hand and adduct formation and cancer risk on the other<sup>203,204</sup>. Perera found two to three times the level of DNA adducts to polycyclic aromatic hydrocarbons in people in polluted areas and also found higher levels of adducts in people with lung cancer than in those without. Mothers exposed to pollution form DNA adducts but their babies have even higher adduct levels potentially putting them at increased risk of cancer from birth<sup>44</sup>.

#### **e) Cancers and Environmental pollution**

Several studies have already given direct evidence of a link between environmental pollution and cancer. These include the Long Island Study showing a link between airborne carcinogens and breast cancer<sup>205,206</sup> and the Upper Cape Study showing that tetrachloroethylene in the water was associated with elevated rates of several types of cancer<sup>207-9</sup>. It is noteworthy that initial investigations were negative in both these places and it was only demonstrated after detailed and sophisticated studies by scientists from many fields. Numerous other studies have shown links between cancer and chemicals: these include associations between volatile organic chemicals (VOCs) in the water and increases in leukaemia in New Jersey<sup>210</sup>, increases in lymphoma in counties in Iowa where drinking water was contaminated with dieldrin<sup>211</sup>, elevated levels of leukaemia in children at Woburn, Massachusetts coinciding with a known period of water contamination with chlorinated solvents<sup>212</sup>, a cancer cluster linked to consumption of river water contaminated by industrial and agricultural chemicals in Bynum, North Carolina<sup>213</sup> and high rates of non-Hodgkin's lymphoma from water contamination with chlorophenols in Finland<sup>214</sup>.

#### **f) Spread of cancer and pollutants**

Airborne pollutants not only affect the chance of contracting cancer but may also influence the chance of the cancer spreading. Animal studies showed that inhalation of ambient level nitrogen dioxide, or polluted urban ambient air, facilitated blood-borne cancer cell metastasis<sup>105</sup>.

#### **g) Levels of Carcinogens in the body**

The reality about most chemicals is that their risks are largely unknown. This is particularly true of chemicals new to the market. What we do know is that about 5 to 10% are probable carcinogens. The International Agency for Cancer Research tested 1000 chemicals in 1993 and found that 110 were probable carcinogens<sup>215</sup>. The National Toxicity Program tested 400 chemicals in 1995 and found that 5-10% were carcinogenic<sup>216</sup>. Only 200 of the 75,000 synthetic chemicals in existence are regulated as carcinogens whereas, from this data, between 3,000 and 7,500 might be expected to be. We have even less knowledge about the carcinogenic potential of combinations of toxic chemicals but what evidence we do have suggests combinations may be more dangerous and yet these are what we are routinely exposed to.

Although the UK figures are not available we know that 2.26 billion pounds of toxic chemicals were released in the USA in 1994: about 177 million pounds of these will have been suspected carcinogens. But what happens to all these chemicals? The reality is that much of this chemical pollution ends up inside us. The evidence for this is as follows:-

In a study, a group of middle aged Americans were found to have 177 organochlorine residues in their bodies.<sup>217,218</sup> This is likely to be an underestimate as EPA scientists consider that the fatty tissues of the US general population contain over 700 additional contaminants that have not yet been chemically characterized<sup>219</sup>. A recent study by the Mount Sinai School of Medicine measured chemicals in the blood and urine of healthy volunteers and found an average of 52 carcinogens, 62 chemicals toxic to the brain and nervous system and 55 chemicals associated with birth defects<sup>220</sup>. They point out that these were chemicals that could be measured and that there were many more that could not, making this again a considerable underestimate. A study of pollutants in amniotic fluid found detectable levels of PCBs and pesticides at levels equivalent to the foetus's own sex hormones<sup>221</sup>. What these studies demonstrate is that what we put out into the world sooner or later comes back



to us and will be stored in our bodies, particularly the lipophilic, bioaccumulative compounds which are particularly damaging. This effect is slow, insidious and real. To allow carcinogens and other poisonous substances into our bodies in this way must be to gamble with our health.

Incinerators emit carcinogens. Particulates themselves are known to be carcinogenic, many heavy metals are known or suspected carcinogens, up to 10% of the chemical pollutants are carcinogenic and there is abundant evidence that carcinogens are far more dangerous when combined than when in isolation.

Common sense dictates that it is reckless to continue to pour more carcinogens into the air at a time when cancer is steadily increasing. Recent studies suggest that we already have to cope with 65 carcinogens in food, 40 carcinogens in water and 60 carcinogens in the air we breathe<sup>222</sup>. They should not be there at all. They should certainly not be increased. If we seriously want to prevent cancer it is of paramount importance that we rapidly decrease the levels of all carcinogens that we are exposed to.

## 5.2 Neurological Disease

Most toxic compounds are preferentially stored in fatty tissue and this includes the brain – making the brain a key target organ for pollutants. There is now compelling evidence that heavy metals and other compounds such as PCBs and dioxins cause cognitive defects, learning problems and behavioural disturbances in children and these effects occur at levels previously thought to be safe<sup>223</sup>. It is inconceivable that these same pollutants have no impact on adult brain function. In fact, some organochlorines, especially those with toxic metabolites and those that dissolve in the cell membranes are known to kill brain cells.<sup>224,225</sup> We note also the ability of ultrafine particulates to carry pollutants across the blood-brain barrier<sup>65</sup>. If neurones were lost at the undetectable rate of 0.1% annually this would lead to a major decline in brain function by middle age<sup>226</sup>.

Of great concern is the developing crisis of Alzheimer's disease which now affects 4.5 million patients in the USA and nearly 700,000<sup>227</sup> in the UK. This is a disease which had never been diagnosed until 1907 and in the UK had only reached 150 cases by 1948. At the present rate of increase, the numbers will double by 2030. These statistics are alarming but need to be seen as part of an overall trend of increasing neurological disease. A recent study has noted substantial increases in neurological diseases in the last two decades coupled with earlier onset of these illnesses. Increases were noted in Alzheimer's disease, Parkinson's disease and motor neurone disease<sup>228</sup>. The increase in Alzheimer's disease was found in almost all developed countries, and rises varied across countries from 20% (which was defined as substantial) to 1200%. The paper suggested environmental factors were likely to be responsible.

It is notable that these diseases of older people have increased at the same time that diseases affecting the brain (including ADHD, autism and learning difficulties) have also shown large increases at the other end of the age spectrum, to the order of 200-1700%<sup>229</sup>. It is very likely that these diseases have aetiological factors in common.

Heavy metal exposure is known to correlate with both Parkinson's disease<sup>103,230</sup> and Alzheimer's disease<sup>75,76,98-102</sup>. Both diseases have increased dramatically over the last 30 years. In addition we have already noted that the average person's body contains at least 62 chemicals which are toxic to the brain and nervous system<sup>220</sup>. It is crucial to look at every possible way to prevent Alzheimer's because of

its huge care costs (US figures are \$60 billion annually) and because of its dire effect on both patients and carers.

Although multiple factors are probably involved in its causation, there is evidence of a link to heavy metal exposure and it is therefore imperative to reduce our exposure to these toxic metals and other neurotoxic chemicals by all means possible. To deliberately increase our exposure to these pollutants, at a time when these diseases are showing huge increases, shows a worrying lack of foresight.

### **5.3 Mental Diseases**

Many pollutants pass straight from the nose to the brain where they affect brain function. Air pollution correlates with inpatient admissions with organic brain syndrome, schizophrenia, major affective disorders, neurosis, behavioural disorder of childhood and adolescence, personality disorder and alcoholism<sup>231</sup>. Increases in the total number of psychiatric emergency room visits and in schizophrenia<sup>232</sup> have been noted on days when air pollution has been high. Depression has also been linked to inhaled pollutants<sup>233,234</sup>. Clearly something very profound occurs when we pollute the air.

### **5.4 Violence and Crime**

An increasing number of studies, including studies of murderers<sup>235</sup>, case-control and correlation studies<sup>13,94,236,237</sup> and prospective studies<sup>96,238</sup> have shown links between violence and heavy metals and these include lead, cadmium and manganese. The majority of the studies have investigated lead. Violence and crime have been associated with both increased body levels of lead and with increased levels of lead in the air. For instance Denno<sup>239</sup> found early lead exposure was one of the most important predictors of disciplinary problems from ages 13 to 14, delinquency from ages 7 to 17 and adult criminal offences, from ages 18 to 22. Stretesky found an association between air lead levels and murder rates in US counties<sup>240</sup>. It is interesting that air lead levels were a much stronger predictor of both violent and property crime than unemployment, which has often been considered an important cause for crime<sup>241</sup>. The likely mechanism is that these substances alter neurotransmitters such as dopamine and serotonin and reduce impulse control.

This growing literature should serve as a warning about the dangers of allowing heavy metals to be emitted into the environment. Crime, especially violent crime, can have a dramatic effect on people's quality of life. We need to consider the effect of incinerators, not only on health, but on education and on quality of life, including the impact of violence and crime.

## **6. High Risk Groups**

### **6.1 The Foetus**

The unborn child is the most vulnerable member of the human population. The foetus is uniquely susceptible to toxic damage and early exposures can have life changing consequences. Why is the foetus so vulnerable? There are two main reasons. Firstly most of these chemicals are fat soluble. The foetus has virtually no protective fat stores until very late pregnancy so the chemicals are stored in the only fatty tissues it has, namely its own nervous system and particularly the brain. Secondly many pollutants are actively transported across the placenta from the mother to the foetus. This occurs with heavy metals which the body mistakes for essential minerals. This is

particularly critical for mercury where one tenth of women already have body stores of mercury which can lead to neurodevelopmental problems in the newborn<sup>242</sup>. Other factors that increase foetal susceptibility are higher rates of cell proliferation, lower immunological competence and decreased capacity to detoxify carcinogens and repair DNA<sup>243</sup>.

Safety limits currently do not take into account this increased risk to the foetus. Only 7% of high volume chemicals have been tested for neurodevelopmental toxicity<sup>244</sup> and very few pollutants have been tested for teratogenicity.

During a narrow window of time, in the first 12 weeks in utero, the foetus's body is affected by miniscule amounts of hormone measured in parts per trillion. Tiny amounts of chemicals can upset this delicate balance. It is now generally accepted that chemicals that are not toxic to an adult can have devastating effects on the newborn. Porterfield has shown that small amounts of chemicals such as dioxins and PCBs, at doses that are not normally regarded as toxic, can affect thyroid hormones and neurological development<sup>11</sup>. A single exposure is enough and timing is critical<sup>245</sup>. Small doses of oestrogenic chemicals can alter sexual development of the brain and the endocrine system<sup>246</sup>.

It is estimated that 5% of babies born in the USA have been exposed to sufficient pollutants to affect neurological development<sup>247</sup>. It has also been shown that exposure to oestrogenic chemicals affects immunity, reduces the immune response to vaccines, and is associated with a high incidence of middle ear and recurrent respiratory infections<sup>248</sup>. The amount of chemical that the baby takes in relates to the total persistent contaminants that have built up in the mother's fat over her lifetime<sup>249</sup>. This will increase in areas around incinerators. Exposure to fine particulate pollution during pregnancy can have an adverse effect on the developing foetus and lead to impaired foetal growth<sup>74</sup>.

In July 2005, in a ground-breaking study<sup>250</sup>, researchers at two major laboratories in the USA looked at the body burden in the foetus. They reported an average of 200 industrial chemicals and pollutants (out of 413 tested) in the umbilical cord blood of 10 randomly chosen babies. These included 180 carcinogens, 217 chemicals that are toxic to the brain and nervous system and 208 that can cause birth defects and abnormal development in animals. A statement by scientists and paediatricians said that the report raised issues of substantial importance to public health, showed up gaping holes in the government's safety net and pointed to the need for major reform to the nation's laws that aim to protect the public from chemical exposures.

Two months later, scientists at the University of Groningen, released the results of a European study, commissioned by WWF and Greenpeace, on the foetal body burden. They tested for the presence of 35 chemicals in the umbilical cord blood of newborns<sup>251</sup>. At least five hazardous chemicals were found in all babies and some had as many as 14 different compounds. The report questioned the wisdom of allowing the foetus to be exposed to a complex mixture of persistent, bio-accumulative and bioactive chemicals at the most critical stage of life.

Incinerators can only have the effect of increasing the foetal body burden and their use is therefore a retrograde step for society. It is particularly important to apply the precautionary principle in issues that affect the foetus, infant and child.

## **6.2 The Breast-fed Infant**

It is a major concern that breast milk, perhaps the greatest gift a mother can give for the future health of her child, has now become the most contaminated food on

the planet, in terms of persistent organic pollutants<sup>252</sup>. In the USA studies of human breast milk have shown that 90% of samples contained a disturbing 350 chemicals. This was higher in industrialised areas showing that inhalation of these toxic substances is an important factor<sup>253</sup>. The dose taken in by a breast-feeding baby is 50 times higher than that taken in by an adult<sup>254</sup>.

The incinerator would add to the total load of chemicals in the mother's fat and those toxins accumulated over a lifetime by the mother will then be transferred to the tiny body of her baby through her milk. Six months of breast feeding will transfer 20% of the mother's lifetime accumulation of organochlorines to the child<sup>255</sup>. From 1979 one in four samples of breast milk have been found to be over the legal limit set for PCBs in commercial feeds<sup>249</sup> and these are known to impair intellectual development<sup>256-8</sup>. Contamination with persistent organic pollutants (POPs) in breast milk in animals has consistently shown structural, behavioural and functional problems in their offspring<sup>259</sup>. For instance, in monkeys it has shown that it decreases their ability to learn<sup>260-2</sup>. Polybrominated diphenyl ethers (PBDEs) are toxic chemicals which have been doubling in breast milk every five years, and have also been rapidly increasing in the waste fed to incinerators as they are now present in many common electrical and electronic goods. PBDEs cause cancer, birth defects, thyroid dysfunction and immune suppression.<sup>263,264</sup> It is truly tragic that one of the few ways of removing these contaminants from the mother's body is by breast-feeding.

### 6.3 Children

Toxic and carcinogenic exposures in early life, including prenatal exposures, are more likely to lead to cancer than similar exposures later<sup>265-7</sup>. At the First International Scientific Conference of Childhood Leukaemia, held in September 2004, Professor Alan Preece suggested that pollutants crossing the placenta, were damaging the immune system and could be linked with soaring rates of leukaemia, which were being initiated in utero. This theme was expanded by Professor George Knox in his recent study which found that **children born in "pollution hotspots" were two to four times more likely to die from childhood cancer**. The "hotspots" included sites of industrial combustion, and sites with higher levels of particulates, VOCs, nitrogen dioxides, dioxins and benz(a)pyrenes – in other words just what would be found around incinerators. He said that, in most cases, the mother had inhaled these toxic substances and they were then passed on to the foetus through the placenta<sup>268</sup>. This is supported by animal studies which have already confirmed that cancer in young can be initiated by giving carcinogens before conception (to the mother), in utero or directly to the neonate<sup>269,270</sup>.

Developing systems are very delicate and in many instances are not able to repair damage done by environmental toxicants<sup>271</sup>. In one study there was an age-related difference in neurotoxicity for all but two of 31 substances tested; these included heavy metals, pesticides and other chemicals<sup>272</sup>. Children are not just a vulnerable group but the current inhabitants of a developmental stage through which all future generations must pass. This fact is recognised in the passage of the Food Quality Protection Act in the USA. It requires that pesticide standards are based primarily on health considerations and that standards are set at levels which will protect the health of children and infants.

Developmental disorders including autism and attention deficit syndrome are widespread and affect 3-8% of children. The US National Academy of Sciences concluded in July 2000 that 3% of all developmental disorders were a direct consequence of toxic environmental exposures and another 25% are the result of

interactions between toxic exposures and individual susceptibility. The causes included lead, mercury, PCBs, certain pesticides and other environmental neurotoxins<sup>273</sup>, substances that are all discharged from incinerators

Recently associations have been reported in case control studies between the body burden of mercury and the risk of autism<sup>274</sup>. In other studies in Texas, associations have been found between the amount of mercury discharged into the air and water by chemical plants and the local incidence of autism<sup>80</sup> and an inverse relationship between the distances of schools from the plants discharging mercury and autism in their youngest pupils 4 years later; this is the lag expected from the fact that the greatest sensitivity to neurotoxicity is seen before birth and in neonates<sup>81</sup>. This suggests that mercury could be responsible but the contribution of other neurotoxins was not excluded.

The study of the Sint Niklaas incinerator found a multitude of problems in children, including learning defects, hyperactivity, autism, mental retardation and allergies<sup>95</sup> and this is exactly what would be anticipated from the above and research already done on the health effects of heavy metals, PCBs and dioxins on children. Animal studies show similarities, with a recent study demonstrating autistic-like behavioural changes in rats whose mothers has been exposed to PCBs whilst pregnant; they had developed abnormal plasticity in the cortex of the brain<sup>275</sup>.

We need also to consider subclinical toxicity. The pioneering work of Herbert Needleman showed that lead could cause decreases in intelligence and alteration of behaviour in the absence of clinically visible signs of toxicity<sup>92</sup>. This has also been shown to be the case with PCBs<sup>276</sup> and methyl mercury<sup>79</sup>. These effects are all the more likely when children are exposed to multiple pollutants, notably the heavy metals, which will be found in the cocktail of chemicals released by incinerators.

Although this has only minor implications for an individual it can have major implications for a population. For instance a 5 point drop of IQ in the population reduces by 50% the number of gifted children (IQ above 120) and increases by 50% the number with borderline IQ (below 80)<sup>277</sup>. This can have profound consequences for a society, especially if the drop in IQ is accompanied by behavioural changes.

## 6.4 The Chemically Sensitive

In the book, *Chemical Exposures, Low Levels and High Stakes* by Professors Ashford and Miller<sup>151</sup>, the authors noted that a proportion of the population react to chemicals and pollutants at several orders of magnitude below that normally thought to be toxic. For example research has discovered individuals who react to levels of toxins previously considered to be safe. Two examples are benzene<sup>278</sup> and lead<sup>93</sup>. It has been demonstrated that there is a tenfold difference between different individuals in the metabolism of the carcinogenic PAH benz(a)pyrene<sup>279</sup>.

Ashford and Miller also noted that studies in both toxicology and epidemiology have recognised that chemicals are harmful at lower and lower doses and that an increasing number of people are having problems. A significant percentage of the population have been found to react this way (15 to 30% in several surveys with 5% having daily symptoms).<sup>151</sup> Research has shown 150 to 450 fold variability in response to airborne particles<sup>280</sup>. Friedman has stated that environmental regulation requires the protection of these sensitive individuals<sup>281</sup>. This highlights the dangers of incinerators which emit a multitude of chemical compounds. Chemical sensitivity is typically triggered by an acute exposure after which symptoms start to occur at very low levels of exposure<sup>151</sup>. Faults are all too common with modern incinerators leading to discharges of pollutants at levels that endanger health – giving

a very real risk of long-term sensitisation. Certain susceptible individuals will be highly affected by these pollutants and these effects will be difficult to anticipate. In addition, people affected this way are extremely difficult to treat.

## **7. Past Mistakes and The Precautionary Principle**

### **7.1 The Precautionary Principle**

The Precautionary Principle has now been introduced into national and international law including that of the European Union<sup>282</sup>. This principle involves acting in the face of uncertain knowledge about risks from environmental exposures. This means public health measures should be taken in response to limited, but plausible and credible, evidence of likely and substantial harm<sup>283</sup>. It is summed up in the 1998 Wingspread statement: “When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context, the proponent of the activity, rather than the public, should bear the burden of proof.” In the case of incinerators a recent review of health effects found two thirds of studies showed a positive exposure-disease association with cancer (mortality, incidence and prevalence)<sup>284</sup> and some studies pointed to a positive association with congenital malformations. In addition without exact knowledge of what pollutants are produced by incinerators, their quantities, their environmental fate or their health effects, it is impossible to assure their safety. It is absolutely clear from this and from the evidence presented here that building municipal waste incinerators violates the Precautionary Principle and perhaps European Law.

### **7.2 Learning from Past Mistakes**

Time and time again it has been found that what we did not know about chemicals proved to be far more important than what we did know. As an incinerator generates hundreds of chemicals, including new compounds, we can expect many unpleasant future surprises. Here are a few examples from the past:

- **Chlorofluorocarbons (CFCs)** These chemicals were touted as the safest chemicals ever invented when first synthesised in 1928. Thomas Midgeley received the highest award from the chemical industry for his discovery. After 40 years on the market suspicion fell on them. They were producing holes in the ozone layer exceeding the worst case scenario predicted by scientists.
- **Polychlorinated biphenyls (PCBs)** These chemicals were introduced in 1929. Toxicity tests at the time showed no hazardous effects. They were on the market for 36 years before questions arose. By that time they were in the body fat of every living creature in the planet and evidence began to emerge of their endocrine disrupting effects.
- **Pesticides** Early pesticides included arsenical compounds but these killed farmers as well as pests. They were replaced by DDT. Paul Muller was awarded the Nobel Prize for this discovery as it was considered a milestone in human progress. But DDT brought death in a different way and it was another two decades before it was banned. Less persistent pesticides then came onto

the market but they had yet another unanticipated problem – endocrine disruption.

- **Tributyl tin (TBT)** In the early seventies scientists noted irreversible damage was occurring to the reproductive system of fish and shellfish, especially clams, shrimps, oysters, Dover Sole and salmon. It was 11 years before the cause was found and it was found to be due to tributyl tin, a chemical added to paint to stop barnacles growing. Incredibly the damage was occurring at a concentration of just five parts per trillion. By the end of the eighties more than one hundred species of fish were known to have been harmed.

This pattern of unanticipated disasters and long latent intervals before their discovery characterises the history of many toxic chemicals and warrants great caution in the use of new compounds. Animal studies almost never warn us of the uniquely human neurotoxic effects on behaviour, language and thinking. In the case of lead, mercury and PCBs the levels of exposure needed for these effects to occur have been overestimated by a factor of 100 to 10,000<sup>285</sup>. To quote Grandjean<sup>283</sup> “*Past experiences show the costly consequences of disregarding early warnings about environmental hazards. Today the need for applying the Precautionary Principle is even greater than before*”

## **8. Alternative Waste Technologies**

An ideal waste strategy would produce no toxic emissions, no toxic by-products, no residues that need landfilling (zero waste), good recovery of materials and be capable of dealing with all types of waste. This might seem a tall order but with a combination of approaches, it is now possible to come quite close to this goal.

Once this aim is made clear then incineration becomes a poor choice. The potentially dangerous emissions to air, the high volume of ash that needs landfilling and the very toxic nature of the fly ash would rule it out. Similarly pyrolysis produces toxic by-products and is best avoided.

The most important component of an integrated strategy must be some form of separation and recycling. We must also look at methods of dealing with residual waste that produce no ash, such as Mechanical-Biological Treatment, Anaerobic Digestion and Advanced Thermal Technologies.

### **8.1 Recycling, Re-use and Composting**

Both government guidance and the European Union Waste Hierarchy make it clear that recycling and re-use are the highest priorities in waste management and that this should take precedence over incineration and landfill. This hierarchy has been described as reduction, reuse, recovery and disposal. Many fine words have been spoken, but the reality is, that without incentives to support recycling, both the increase in landfill tax and the European Directives to reduce the amount of biodegradable waste going to landfill are driving waste management towards its lowest priorities, principally incineration. This has now becoming the easiest option for local authorities. Waste policy is veering away from its stated highest priorities with their low environmental impact towards the least sustainable options which have the highest environmental impact.

The net effect of this is that incineration, with its large appetite for high calorific recyclable materials, is now in direct competition with recycling and has

become an obstacle to sound waste policy. This is an inversion of the Waste Hierarchy and removes the motivation to re-use and recycle. One way forward would be to use the strategy already employed by several countries such as Sweden and the Netherlands, where waste cannot be delivered to landfill or incinerators without having undergone separation or treatment. In effect, this stops the sending of recyclable items to landfill and incineration.

About 46% of municipal waste consists of paper, cardboard, fabrics, glass and metals – all of which could be recycled. Metals are becoming more valuable and are already being mined in dumps in parts of the world. About 32% consists of garden and food waste which could be composted. Several commentators have emphasised that, for recycling programs to work successfully, it is important to have systems in place that are easy to use. Doorstep collections of organic waste are especially important. Another 13% of waste is plastics which are discussed below.

The UK presently recycles about 23% of its waste. Many other countries recycle a far higher proportion of their waste with Norway, Austria and Holland achieving over 40% and Switzerland over 50%. St Edmundsbury in the UK has reached 50%. Below is a table showing that many areas have achieved high rates of municipal waste diversion (recycling, re-use and composting) and this demonstrates that diversion rates of 50-70% are realistic targets.

Locality	Diversion Rate (percent)
<i>Zabbaleen</i> -served areas of Cairo, Egypt	85
Opotiki District, New Zealand	85
Gazzo (Padua), Italy	81
Trenton, Ontario	75
Bellusco (Milan), Italy	73
Netherlands	72
Northumberland County, Ontario, Canada	69
Sidney, Ontario	69
East Prince, Prince Edward Island, Canada	66
Boothbay, Maine, U.S.A	66
Halifax, Canada	65
Chatham, New Jersey, U.S.A	65
Falls Church, Virginia, U.S.A	65
Galway, Ireland	63
Belleville, Ontario	63
Canberra, Australia	61
Bellevue, Washington, U.S.A	60
Guelph, Ontario, Canada	58
Gisborne District, New Zealand	57
Cifton, New Jersey, U.S.A	56
Loveland, Colorado, U.S.A	56
Denma~	54
Bergen County, New Jersey, U.S.A	54
Worcester, Massachusetts, U.S.A	54
Leverett, Massachusetts, U.S.A.	53
Ann Arbor, Michigan, U.S.A.	52
Crockett, Texas, U.S.A.	52
Dover, New Hampshire, U.S.A	52
Kaikoura District, New Zealand	52
Switzerland	50
Nova Scotia, Canada	50
Portland, Oregon, U.S.A	50
Madison, Wisconsin, U.S.A	50
Fitchburg, Wisconsin, U.S.A	50
Visalia, California, U.S.A	50



## 8.2 Producing Less Waste

However efficiently we recycle, re-use and compost, these cannot solve the waste problem without another vital step; namely producing less waste in the first place. To emphasise this point, the amount of municipal and business waste in the UK is still growing<sup>286</sup> in spite of higher rates of recycling.

Various solutions to this are gaining popularity. One is Extended Product Responsibility (EPR) where firms take physical and financial responsibility for products even after they are sold, collecting their products and packaging after use. This encourages firms not to produce non-recyclable and non re-usable products. It has been applied to packaging, tyres, and electronics. EPR needs to be extended but where this is not practical, such as where products are hazardous or non-recyclable, then a product ban might be appropriate. A further solution would be to tax non-recyclable items to discourage their production.

There is a further aside to this issue which has yet to be addressed by governments. The developed world is producing, and disposing of, increasing amounts of goods of all kinds, including large amounts of synthetic materials unknown a century ago. The rest of the world is not unnaturally wanting to share the prosperity, but we are rapidly reaching a point where continuing even at the present level will become impossible because we are running out of both energy and of essential materials, particularly oil.

We have finite sources of oil from which so many materials are made. We are probably close to reaching peak production and this resource will diminish over the next few decades at a time when demand is increasing internationally. Natural gas will peak a decade or two later and then diminish. The only other two major sources of energy would be coal and nuclear power. Nuclear energy, even in the unlikely event that a safe way could be found to deal with the radioactive waste, would last between 8<sup>287</sup> and 17 years<sup>288</sup> if it was supplying 20-25% of the world's energy because uranium is also a finite resource. Burning coal could cause a disastrous increase in greenhouse gases. Again it could not make up for the shortage of energy and would last less than a century<sup>289</sup>. At present it appears that genuinely renewable sources of energy could provide, at the very most, 40% of our present energy requirements<sup>289</sup>. (In reality it is likely to be much less and it has been estimated renewable sources will produce 4¾ % of total energy and 22% of electricity by 2020 in the UK).<sup>290</sup> Different experts will have their own opinions on all of these figures, but one thing is certain: - we are running out of energy. We can anticipate a 20% reduction in energy from all sources in 40 years and a 40% reduction in 60 years<sup>289</sup>. Long before this happens the price of energy and of goods made from oil will soar.

There is only one possible solution to this problem in the long term and that is to reduce our use of energy which means reducing our production and consumption of goods, and preserving our resources, including the valuable components in our waste.

## 8.3 Zero Waste

Zero waste, initially introduced in New Zealand has been taken up successfully by other regions and cities such as San Francisco, The Philippines, Flanders, Canberra, Bath and North East Somerset. In the UK, 71% of councils have committed to zero waste as part of their plan. This means working towards a goal of producing zero waste and avoiding disposal in landfill and incineration. The policy of the European Union is already on the path towards zero waste. **Zero waste and incineration are mutually incompatible.**

There are some difficulties with zero waste. One is that not all materials can be recycled and there will be some residual waste, notably plastics. Other goods contain mixed ingredients (for example envelopes containing plastic windows) and cannot easily be recycled. These could be taxed or banned. Some areas such as Flanders in Belgium have recognised this problem and have innovatively set a target for residual waste, currently 150kg per capita per year (UK: 400kg per capita per year). This is a useful idea and the policy sends out a strong signal to manufacturers to produce recyclable products.

## **8.4 The Problem of Plastics**

A large amount of our waste is plastics and related materials such as PVC. Presently only two types of plastics can be recycled. The first key question is what will we do with these non-recyclable plastics? The second key question is how do we make chlorinated plastics safe for the future, taking into account that their highly persistent and toxic nature? The third key question is can we use plastics as a future resource? These are not small issues. For example, we use 500 billion carrier bags each year. They are used for an average of 20 minutes and are virtually indestructible, lasting for centuries. Many end up as microscopic tilth in the oceans. They then find their way into the food chain via lugworms and barnacles.

Incineration is a poor answer to these issues as many plastics are organochlorines and form toxic products, notably dioxins, when burnt. In addition an important resource is wasted. We use about 3-4% of our oil to produce these plastics and it makes no sense to simply burn them. The best solution would be to stop making chlorinated plastics in the first place in view of their persistence and toxicity. Instead we could make biodegradable plastics (but note these will break down to form the greenhouse gas methane). Another answer is plasma gasification. Plasma gasification, unlike incineration can convert chlorine-based plastics back to their original starting material, namely salt and water and synthesis gas (carbon monoxide and hydrogen). Further procedures can be used to convert synthesis gases into highly useful materials: fuels such as ethanol and Fischer-Tropsch diesel (a cleaner form of diesel) or ethylene to produce more plastics. In other words it could be used to both detoxify and reform plastics.

## **8.5 Anaerobic Digestion of Organic Matter**

The problems of landfills are threefold. One is the production of greenhouse gases, principally methane. The second is the seeping of chemicals from landfill sites into aquifers. The third is lack of space. The former is the most urgent problem to solve. The methane is produced by organic waste, in other words rotting organic matter, but not by plastics (except bio-degradable ones) or metals. At present the methane is burnt in a flare tower or gas generator plant at the landfill site. However this is very inefficient. A far better option is to remove the paper, plastics and metals and allow the waste to break down in an anaerobic digester. The methane can then be burnt in a combined heat and power plant to produce electricity and heat. As this occurs in a sealed unit the environmental impact is much less than a landfill gas power plant. If this type of facility was used for the majority of agricultural waste and sewage then it could supply 3% of the UK's electricity and would also displace carbon emissions<sup>284</sup>

## **8.6 Mechanical Biological Treatment (MBT)**

This treatment is used extensively in Germany, Italy and Austria, has been in use for over 10 years and is due to be introduced into the UK. The process involves a mechanical stage in which the waste is chopped up into fragments and then separated by being put through screens of various sizes and past magnets. This process will separate the waste into fractions which can be used for different purposes. For instance metals, minerals and hard plastics can then be recycled. Paper, textiles and timber can also be recovered. Organic matter can then be broken down by composting – this is the biological treatment. This can be achieved by exposing the waste to atmospheric oxygen or it can be broken down in the absence of oxygen (anaerobic digestion). The remaining rubbish can then be landfilled. This process is virtually pollution-free **unless the remaining pellets are burnt** with all the risks this entails. With MBT most of the original goals are being met. It fails on two counts only. Firstly there is some residue that needs landfilling – this is a minor point but the second is more serious: MBT cannot cope with all types of waste as it is not suitable for hazardous waste. This is important as the amount of hazardous waste is likely to increase. So MBT needs to be part of a system.

Note that residues from MBT have had the organic matter removed, so they will not produce the problematic greenhouse gases. For this reason we believe it is wrong that it incurs the full landfill tax as happens at present.

## 8.7 Advanced Thermal Technologies (ATT) and Plasma Gasification

In contrast with non-thermal methods, any thermal method of dealing with waste carries an inherent risk of causing fatalities. Because of this thermal methods should only be used for residual waste after full separation of recyclables has taken place. If thermal methods are used, these should always be the safest ones available. In effect this means plasma gasification or gasification using the Thermoselect process. Japan has more experience of incineration than any other country and has started to use plasma gasification as a safer alternative to incineration. Plasma gasification is also in use in Canada.

Plasma gasification achieves the final objective by disposing of the residual waste after separation and recycling and other separating technologies such as mechanical-biological treatment. It can deal safely with the most hazardous types of waste and can produce up to three times as much energy as incineration.

Gasification has been employed by the natural gas industry for over 80 years but has not, so far, been used extensively for dealing with waste, although such plants are now in operation in Italy, Switzerland, Germany and Japan. Gasification produces high temperatures and can thermally decompose complex and hazardous organic molecules into gases and benign simple substances. Plasma refers to the gas when it has become ionized and this happens when an electric current is passed through the gas. **A very important distinction from incineration is that it does not produce ash.** The gas cleaning process can convert many contaminants into environmentally benign and useful by-products. The abatement equipment of incinerators and gasification units is very different. If the abatement equipment in an incinerator fails, as is all too common, people downwind from the installation will be subjected to dangerous pollution. If the abatement equipment in a gasification unit fails it will cause serious damage to the plant itself – so the plant has to be built to a much higher quality.

In a plasma gasification plant, the residual toxic substances including metals become encapsulated in silicate which is like being encased in stone. The plant will remove the toxic and persistent compounds from plastics and other chemicals and

reform them. A good quality plasma gasification unit will not produce any adverse residues or by-products, only synthesis gas, silica, sulphur and salt. Synthesis gas is a useful by-product which can be used as a fuel; — a major financial advantage which allows the capital costs of the unit to be paid within a 7 year period. Although it is a relatively expensive process, it is far cheaper than incineration once the health costs are taken into account (see section 9.1). Note also that it would not incur costs under the European Union Emissions Trading Scheme, potentially saving millions of pounds annually. A recent review of plasma gasification considered it to be a promising alternative to older technologies and that the present climate favoured the adoption of advanced technologies for waste treatment<sup>291</sup>. If it is combined with MBT and recycling, then only a small unit would be needed.

It is important to realise that gasification systems can vary in quality and therefore safety. It is crucial that there is a good gas cleaning system which goes through 7 or 8 stages. It is also essential that temperatures of 1500 C are achieved - enough to break down organochlorines and convert them back to their original safe form, salt and water.

Organochlorines are probably the most problematical group of chemicals on the planet so a real benefit of this technology is that this process reverses of the chlor-alkali process that produces organochlorines in the first place

## **8.8 Greenhouse Gases**

Incineration has been sold as a source of green energy and even more bizarrely as a source of renewable energy. This is far from the truth. In a recent report, incineration was found to be second only to coal fired power stations as a producer of greenhouse gases.

However this is only part of the problem. With incineration there are two releases of greenhouse gases – once when the material is burnt and another when it is re-manufactured. Once we add to the equation the carbon and other greenhouse gases produced when these products are remade, as opposed to being recycled, then it becomes obvious how wrong it would be to regard incineration as a source of green energy. In fact, between two to five times more energy goes into remaking products than the energy recovered from incinerating them<sup>292</sup>.

Recycling is far more energy efficient than incineration and has greater carbon benefits. With the high rates of methane capture assumed by DEFRA, landfill has similar CO<sub>2</sub> emissions to incinerators.

All incinerators should be routinely assessed for their effect on global warming.

## **9. The Costs of Incineration**

### **9.1 Direct and Indirect Costs**

Incineration has been reported to be more expensive than alternative waste strategies even when health costs are not considered. A recent document from the Scottish Environmental Protection Agency estimated that the disposal costs to process a tonne of waste would be £50-80 for incineration compared to £30-40 for aerobic digestion. These costs include high transportation costs and the equivalent figure for England would be £20-30 lower per tonne (making it approx £25-55 per tonne for incineration and £5 per tonne for aerobic digestion). The capital costs of aerobic digestion would be about half that of incineration<sup>293</sup>.

It is likely that the waste industry will come under the European Union Emission Trading Scheme (ETS) within the next 10 years, in an effort to offset carbon emissions. This would greatly increase the cost of incineration. Two tonnes of carbon are produced for every tonne of waste burned. The present cost per tonne of carbon, under ETS, will be around €20 and this cost will gradually increase, which would add approximately £30 to each tonne of waste burned. Councils will then be committed to paying an escalating cost, starting at £12 million per annum (for a 400,000 tonne a year incinerator) for up to 25 years\*. It is a travesty that this cost should fall on local taxpayers subjected to this pollution which they did not ask for and which could be putting their own health at risk. We believe that many councils may be unaware of the implications of Emissions Trading Scheme.

Another consideration councils may be unaware of is the financial impact of Renewable Obligation Certificates. Basically some waste disposal systems will attract these certificates, whilst others will not. The systems that attract ROC credits could produce very significant increases in income. These would be worth millions of pounds per annum for the waste companies operating such plants and for council taxpayers in areas where waste companies operate such equipment on their behalf.

Incinerators generally attract no ROC payments. An exception to this is a CHP (combined heat and power) incinerator which attracts a payment of 1 ROC, or a fraction of an ROC, per megawatt hour of power generated \*\*. Plasma gasification and anaerobic digestion attract a payment of 2 ROCs, or associated fraction, per megawatt watt hour of power generated. These technologies are not only far safer but this payment also makes them a much more attractive financial proposition.

The implication of this is that a 200,000 tonne per year incinerator would attract no payment but a 200,000 tonne per year plasma gasification unit would attract a payment of £4.9 million per annum \*\*\*. This would allow the waste company to offer a substantial reduction in their charge to the council for each tonne of waste received. This would, in turn, lead to large savings for both council taxpayers<sup>3</sup>.

However, calculation of the total costs of different methods of getting rid of waste must not only include the set-up and running costs but also the environmental, human and health costs. In the case of incineration, human and health costs are substantial but tend to be overlooked because they come out of another budget. However the health costs will have to be paid for and must be included in the equation. Dealing with the ash produced by incinerators represents another major cost to society, which again will come out of someone else's budget. These are not small costs and to give some idea of the magnitude of the costs involved, it was estimated that in 1992 the bill for remediating all the contaminated waste sites in the USA was \$750 billion<sup>294</sup>.

\* Although these charges will be directed at the waste producer, contract clauses protecting them will ensure these high costs are passed on.

\*\* ROC payments related to renewable energy generated by waste facilities are based on the percentage of feedstock that can be classed as renewable. Waste is not a wholly renewable substance and is deemed by Ofgem to contain 50% renewable content. Therefore, only half a megawatt of renewable electricity will be generated when one megawatt overall is generated. As a consequence of this, the megawatt generated will only attract half an ROC.

\*\*\* a 200,000 tonne per annum plasma gasification unit would burn 24 tonnes per hour producing 14 megawatts per hour or 122,640 megawatt hours per annum. It is assumed that 50% of this fuel is renewable and hence there will be a rebate of 50% on the 122,640 megawatts of electricity produced (2 ROCs per MWh x 0.5). Each megawatt would attract a payment of approximately £40. This amounts to a saving of £4.9 million pounds per annum.

## 9.2 Health Costs of Incineration

The health costs of incineration are huge. A 1996 report by the European Commission suggested that for every tonne of waste burnt there would be between £21 and £126 of health and environmental damage, meaning that a 400,000 tonnes per year incinerator would cost the tax-payer between £9,000,000 and £57,000,000 per year<sup>295</sup>: this figure was based on earlier data when emissions to air were somewhat higher so now these costs would be expected to be less. (However note the corresponding increase in costs that is now needed to make fly ash safe. The better the pollution control the more toxic the residues will be and the more expensive they will be to deal with.)

Studies that have tried to estimate the combination of all these costs of incineration have come up with astonishingly high figures. DEFRA's report in 2004 found that the health costs from PM<sub>10</sub> particulates from incinerators alone, using a central to high estimate, would be £39,245 per tonne of particulates emitted (NB not per tonne of waste burnt)<sup>296</sup>. A 400,000 tonne per year incinerator would produce about 24,000kg (24 tonnes) of particulates per year and the DEFRA estimate of health costs would be £941,000 per annum.

However DEFRA looked at 13 studies of PM<sub>2.5</sub> and PM<sub>10</sub> particulates and noted that the health costs ranged from £2,000 - £300,000 per tonne for PM<sub>2.5</sub>s and £1,800 - £226,700 for PM<sub>10</sub>s. These estimates were based on modelling data which for reasons described in section 12 are likely to underestimate particulate emissions. In particular they do not take into account recent data demonstrating high levels of pollutants emitted during start-up and shut-down. It is therefore reasonable to assume that the actual health costs would be at the higher end of the range, with a cost of £226,700 per tonne for PM<sub>10</sub>s and £300,000 per tonne for PM<sub>2.5</sub>s giving a total health cost per annum for particulates alone of £6.5 million \*\*\*\*. To give a realistic estimate of the health costs of incineration, the additional costs from the other pollutants must be added to this.

In a review of health costs of incineration Eshet<sup>297</sup> noted the complexity and difficulty of these calculations, with estimates varying between \$1.3 and \$171 per tonne of waste burnt. A study of British incinerators estimated the cost to be between \$2.42 and \$13.16 per tonne of waste burnt<sup>298</sup>. Most of these studies do not take into account the cost of ash, the cost of clean-up of accidents or water contamination or the more subtle health effects such as behavioural changes, reduction in IQ, reproductive and hormonal effects which have become apparent in recent years with many pollutants such as lead and organochlorines. For this reason it is likely the costs are considerably higher than estimated. Based on the findings of all these studies we can estimate that a 400,000 tonne a year incinerator will cause millions of pounds worth of health damage annually. These large health costs alone clearly demonstrate that incinerators make a poor choice for waste management. When a single incinerator can generate health costs of many millions of pounds every year, according to the government's own data, it is absurd to argue that incinerators are safe.

It is hard to see any justification for these huge health costs when other methods such as mechanical biological treatment (MBT), aerobic digestion and plasma gasification with low environmental and health costs (see section 8) are available. These methods have not been given sufficient consideration in the UK. MBT is relatively cheap but plasma gasification is more expensive to install. However, if the health costs are taken into account plasma gasification is very much cheaper than incineration. It makes no logical sense to use a method of waste disposal

that has a total cost far in excess of other methods. And we must ask is it morally acceptable to knowingly incur such high health costs.

\*\*\*\* This calculation is as follows. The Quality of Urban Air Review Group has estimated that the PM<sub>2.5</sub> fraction of total particulates is between 28% and 100%. Leaving aside the likelihood that the PM<sub>2.5</sub> fraction is higher from incinerator emissions an average figure of 60% PM<sub>2.5</sub>s would be likely. This calculation therefore estimates that a 400,000 tonne incinerator would produce 24 tonnes of particulates, that 60% would be PM<sub>2.5</sub> particulates at a cost of £4.32 million per annum and 40% would be at the lower cost for other PM<sub>10</sub>s costing £2.18 million per annum. The total cost in health damage from particulates would therefore be £6.5 million per annum.

### **9.3 Financial Gains from Reducing Pollution**

The EC Okopol report of 1999<sup>299</sup> calculated that every pound spent on pollution abatement saved £6 in health care costs and £4 in social security costs. A report from the US Environmental Protection Agency also reckoned that every dollar spent on abatement saved 10 dollars in health costs.

In addition, a White House study by the Office of Management and Budget in 2003 concluded that enforcing clean air regulations led to reductions in hospitalisations, emergency room visits, premature deaths and lost workdays which led to a saving of between \$120 and \$193 billion between October 1992 and September 2002. This is an underestimate as it did not look at other health savings such as prescription costs and primary care costs. Few other measures today would give so dramatic a health benefit and such a large saving in health costs<sup>300</sup>.

### **9.4 Other Studies of the Health Costs of Pollution**

Recent studies have drawn attention to the huge unanticipated costs to society of pollution from other sources. The International Joint Commission's Science Advisory Board, the Workgroup on Ecosystem Health (SAB-WGEH) looked at a series of health problems where there was hard evidence for environmental causation. Reasoned arguments suggested that the contribution made by toxic substances to these health problems was between 10 and 50%. Four health problems which they considered concern us here, because they involve pollutants similar to those released from incinerators. These are neurodevelopmental defects, hypothyroidism, loss of 5 IQ points and Parkinson's disease. The cumulative costs in the USA for these disorders alone were considered to be between \$370 and \$520 billion per year. Even using the lowest estimate of environmental contribution (10%), the costs due to pollutants was \$40 billion dollars annually<sup>301</sup>.

The WWF investigated three conditions — mental retardation, cerebral palsy and autism — to assess the impact of chemical pollution, and calculated the cost of toxic chemicals on children's brain development to be approximately £1 billion annually<sup>302</sup>.

## **10. Other Considerations of Importance**

### **10.1 The Problem of Ash**

The incineration of waste produces a large amount of ash, amounting to 30% of the weight of the original waste; 40-50% of the volume of compacted waste. This is important as landfill sites are becoming less and less available so there is an urgent need for a workable alternative. It is clear that incineration will not solve the landfill problem since it can only reduce the bulk by just under half. Little thought has been

given to this and incinerator operators are still being given 20 to 30 year contracts creating problems for the future.

Incinerators produce two types of ash, bottom ash and fly ash, sometimes called air pollution control (APC) residues. The latter is highly toxic and listed as an absolute hazardous substance in the European Waste Catalogue. It has high concentration of heavy metals and dioxins. Many substances such as metals have little toxicity before incineration but become hazardous once converted to particulates or fine particles in the ash. In fact, the combination of pollutants in the fly ash can amplify the toxicity. Using a biological test, researchers found that the toxicity in fly ash was five times greater than could be accounted for by the content of dioxins, furans and PCBs<sup>303</sup>.

There is a basic problem with modern incinerators. The less air pollution produced, the more toxic the ash. Early incinerators emitted large volumes of dioxins. These emissions have been significantly reduced, but at the cost of a corresponding increase in the fly ash, with similar increases in heavy metals and other toxic chemicals. An incinerator burning 400,000 tonnes of waste annually for its 25 years of operation would produce approximately half a million tonnes of highly toxic fly ash<sup>3</sup>. Apart from vitrification, no adequate method of disposing of fly ash has been found. The EU Commission have stated that leaching from landfill sites may be one of the most important sources of dioxins in the future. Heavy metals are known to have high leachability. The US Environmental Protection Agency considers that all landfills eventually leach through their liners. As most of these pollutants are persistent, probably lasting for centuries, they will sooner or later threaten the water table and aquifers where their removal would be near impossible. Allowing this to take place is an abdication of our responsibility to future generations.

In spite of the massive health risks associated with fly ash it is poorly regulated. At Byker, near Newcastle-upon-Tyne, 2000 tonnes of fly ash laden with dioxins was spread over allotments, bridle paths and footpaths for six years between 1994 and 2000. This cavalier approach to managing toxic waste appears to have changed little. In January 2008, a recently permitted hazardous waste site at Padeswood (for storing fly ash from a cement kiln) was flooded. Fortunately no hazardous waste had been stored at the time otherwise it would have carried the toxic waste into brooks and thence into the River Alyn from where drinking water is extracted.

Workers are often exposed to this ash without protective gear. Even today this material has been foolishly used for construction purposes ignoring its toxic properties and the potential for the release of pollutants during use and from ordinary wear and tear.

Fly ash needs to be transported away from the incinerator and this can involve lengthy journeys. These represent an important hazard. An accident could potentially make an area uninhabitable, as happened at Times Beach, Missouri, due to dioxin-contaminated oil. These potential costs have yet to be factored into the cost calculations of incinerators.

Bottom ash is a less severe hazard, but still contains significant quantities of dioxins, organohalogenes and heavy metals. It is extraordinary that whereas regulations have tightened in recent years to reduce dioxin emissions to air, bottom ash, which contains 20 times more dioxin, is unregulated and bizarrely is regarded as inert waste. This misclassification had allowed it to be charged at the lowest rate at landfill sites. We believe this is wrong: it is not inert and should not be classified as such. It should be charged at a rate that is in keeping with its toxicity.



The Stockholm Convention makes it clear that dioxins and furans should be destroyed, which currently means using vitrification. In Japan, this is done responsibly and much of the fly ash is now treated by plasma gasification but this essential safety step has been neglected in the UK. Because of the toxicity of bottom and fly ash there should be a full assessment of the cost of a clean-up operation for both water and land contamination. Environmental clean-up costs should be shown as part of the cost of incineration, and, when relevant, of other waste disposal strategies.

## **10.2 Radioactivity**

### **a) Associated with Incinerators**

Over thirty sites in the UK incinerate radioactive waste. Most countries consider this too hazardous.

The majority of radioactive waste incinerated in the UK is alpha or beta emitting radiation. These types of radiation are not very dangerous outside the human body due to their short range (within tissues this is millimetres for alpha particles and centimetres with beta particles), although beta radiation can penetrate the skin. Once incinerated this relatively safe material is converted into a highly dangerous and sinister pollutant. During incineration, billions of radioactive particulates will be formed and emitted into the air. These may be inhaled by anyone unfortunate enough to be downwind at the wrong time, and pass through the lungs and circulation and then into the cells. Once inside the body it will continue to emit radiation. Alpha radiation has a very short range but great destructive power. Both alpha and beta radiation will be highly destructive and carcinogenic to nearby tissues. Each one of the billions of radioactive particulates emitted represents a very real danger. There can be no safe threshold for this material. The risk from this policy is obvious.

Safety regulations bizarrely make no distinction between internal and external radiation even though these are markedly different. For instance Beral found that prostate cancer was higher in workers in the nuclear industry. There was no correlation with external radiation but a highly significant correlation with internal radiation<sup>304</sup>. Animal studies make this even more clear and rats injected with 0.01mGy of Strontium 90 were found to have pathological damage even though the dose was 200 times less than background radiation<sup>305</sup>. Of more concern is the fact that transgenerational effects have also been demonstrated. Mice two generations from a male injected with this Strontium 90 suffered lethal genetic damage, demonstrating that chromosomal damage was passed through the genes to the offspring of irradiated mice<sup>306</sup>.

Many people would be surprised to know just how small a dose of radiation is needed to cause harm. After Chernobyl sheep were monitored for Strontium 90 and the limit set was 0.0000000019 grams per kilograms of meat, so small it would be invisible<sup>307</sup>. And yet regulations allow billions of particulates containing similarly minute quantities of radioactive material to be emitted into the air from incinerators. In contrast, natural background radiation is, at most, a minor hazard. For instance Aberdeen has double the level of natural background radiation but no increased risk of leukaemias or cancers.

### **b) Associated with Other Sites**

Increased incidence of leukaemias and cancers around sites releasing radioactive material are well documented. At Seascale a public health enquiry found children were more than ten times more likely to get leukaemia and three times more

likely to get cancer<sup>308,309</sup>. The incidence of leukaemias in children living within 5 kilometres of the Krummel and Goesthacht nuclear installations in Germany is much higher than in Germany as a whole. Significantly, the first cases of leukaemia only appeared five years after Krummel was commissioned. At Dounreay there was a sixfold increase in children's leukaemia<sup>310</sup> and at Aldermaston there was also an increase in leukaemias in the under fives<sup>311</sup>. Sharply rising leukaemia rates were noted in five neighbouring towns surrounding the Pilgrim nuclear plant in Massachusetts in the 1980s. It was thought to be linked to radioactive releases from the Pilgrim nuclear plant ten years earlier where there had been a fuel rod problem. 'Meteorological data showed that individuals with the highest potential for exposure to Pilgrim emissions had almost four times the risk of leukaemia compared to those having the lowest potential for exposure'<sup>312,313</sup>. A recent meta-analysis of 17 published reports that covered 136 nuclear sites across the world took a global look at the problem. They found death rates from leukaemia in children under the age of 9 were increased by 21% and in those under 25 by 10%<sup>314</sup>. They noted that discharges from these plants have been too low to account for the leukaemias using standard criteria (based on single or intermittent high dose radiation). The likely explanation here is internal radiation where a minute dose taken internally would be enough to trigger a cancer or leukaemia. This should be seen as a strong warning about the danger of incinerating and dispersing radioactive matter into the environment.

The weight of evidence here strongly suggests that airborne radioactivity is a potent carcinogen and likely to be extremely hazardous. To allow it at all is foolhardy but to combine this with a cocktail of other carcinogens is reckless.

### 10.3 Spread of Pollutants

The National Research Council, an arm of the National Academy of Sciences, that was established to advise the US government, concluded that it was not only the health of workers and local populations that would be affected by incinerators. They reported that populations living more distantly are also likely to be exposed to incinerator pollutants. They stated "*Persistent air pollutants, such as dioxins, furans and mercury can be dispersed over large regions – well beyond local areas and even the countries from which the sources emanate. Food contaminated by an incinerator facility might be consumed by local people close to the facility or far away from it. Thus, local deposition on food might result in some exposure of populations at great distances, due to transport of food to markets. However, distant populations are likely to be more exposed through long-range transport of pollutants and low-level widespread deposition on food crops at locations remote from an incineration facility.*"<sup>315</sup>

They later commented that the incremental burden from all incinerators deserves serious consideration beyond a local level. This has obvious relevance to the present policy of promoting incinerators in the UK. An important point is that the more toxic smaller particulates, which typically have more toxic chemicals and carcinogens attached, will travel the furthest.<sup>316</sup>

Most chemical pollutants are lipophilic and are therefore not easily washed away by the rain after they settle. When they land on crops they enter the food chain where they bioaccumulate. It has already been admitted that most dioxin in food today in the UK came from the older generation of incinerators. All chemicals capable of entering the food chain will sooner or later reach their highest concentration in the foetus or breast fed infant.

A striking example of the unforeseen and tragic consequences of releasing pollutants into the air has been seen in Nunavut, in the far North of Canada in the Polar Regions. The Inuit mothers here have twice the level of dioxins in their breast milk as Canadians living in the South, although there is no source of dioxin within 300 miles. At the centre of Biology of Natural Systems in Queen's College, New York, Dr Commoner and his team used a computer programme to track emissions from 44,000 sources of dioxin in North America. This system combined data on toxic releases and meteorological records. Among the leading contributors to the pollution in Nunavut were three municipal incinerators in the USA<sup>317,318</sup>.

## 10.4 Cement Kilns

Although this report is primarily about incinerators it is useful to compare incinerators with cement kilns. Both produce toxic emissions of a similar type and much of the report is relevant to both. Cement kilns convert ground limestone, shale or clay into cement. They require large quantities of fuel to produce the high temperatures needed and this lends itself to the use of non-traditional fuels such as tyres, refuse-derived fuel and industrial and hazardous wastes variously called Cemfuel, secondary liquid fuel (SLF) and recycled liquid fuel (RLF).

However, pollution and planning controls are significantly weaker than those for hazardous waste incinerators. Cement kilns produce a number of toxic emissions similar to incinerators. Burning tyres produces emissions with dioxins and zinc and burning petroleum coke produces vanadium and nickel. Releases of mercury and arsenic are uncontrolled as these are vapourised. The risk from dioxins is considerably greater as most cement kilns do not have the activated charcoal needed to remove them.

The risk from PM<sub>2.5</sub> particulates is extremely serious. The limit set for the weight of all particulates emitted by incinerators is 10mg per cubic metre. However cement kilns are allowed to emit 30-50 mg per cubic metre. This would be excessive by itself but the volumes of emissions from cement kilns can be up to five times greater than incinerators. Therefore some cement kilns can produce emissions of particulates and other toxic substances which are in excess of 20 times that of incinerators under normal operating conditions. Worse still they have poorer abatement equipment and usually lack the activated charcoal needed to reduce emissions of metals and dioxins.

The electrostatic precipitators need to be shut off when carbon monoxide levels build up due to the risk of explosion. This leads to unabated emissions. This has happened 400 times a year in one plant. The quantities of particulates released at these times are immense reaching 20,000mg per cubic metre which are the highest level that can be measured. Recent research has demonstrated unequivocally that small increases in PM<sub>2.5</sub> particulates will increase cardiovascular and cerebrovascular mortality, so to allow releases of this order therefore borders on the negligent. Incredibly PM<sub>2.5</sub> particulates are not routinely measured.

Independently-audited monitoring by a registered charity at one cement kiln in the UK has continuously recorded levels of particulates, using 15 minute average readings<sup>319</sup>. They have found extremely high surges of particulates, typically with peak readings occurring at night, sometimes several times a week, with maximum PM<sub>10</sub> particulates reaching levels of over 4500 µg per cubic metre and maximum PM<sub>2.5</sub> reaching over 170µg per cubic metre. Current scientific knowledge on particulates suggests that these levels would be expected to cause cardiovascular deaths and the findings demonstrate the urgent need for independent monitoring

around all cement kilns. This monitoring has exposed major deficiencies in the present monitoring and regulatory system.

Thermal treatment of hazardous waste is always a highly dangerous activity and the very best available technology needs to be used. Cement kilns are effectively being used to burn hazardous waste on the cheap. Sadly hazardous waste typically finds its way to the least regulated and cheapest disposal methods, in practise those that create the most health risks and the most environmental damage.

Cement kiln technology has remained virtually unchanged since the turn of the twentieth century. They can only be refitted or retrofitted to a minimal degree to improve efficiency and toxic waste destruction. The Select Committee for the environment recommended studies on the safety of cement kilns over 10 years ago and this has been ignored. Why?

Cement kilns are therefore capable of extremely serious health consequences. Incredibly some of these cement kilns have been sited in the middle of towns where they would be expected to have a major effect on the health of the local population. The fact that they are allowed at all is astonishing, for the maximum impact will inevitably be on the most vulnerable members of society, and in particular the unborn child.

## **11. Monitoring**

At the heart of the problems with incineration is the poor quality and unsatisfactory nature of monitoring at these installations, unsatisfactory in the way it is done, the compounds monitored, and the levels deemed acceptable, and the lack of monitoring of body burdens in the local population. The problems are as follows:

### **Very Few Pollutants are being measured**

Out of the hundreds of chemicals released from an incinerator only a tiny proportion are measured. On current data, the three most important pollutants released by incinerators are dioxins, heavy metals and PM<sub>2.5</sub> particulates. Incredibly these are virtually unmonitored. Only half a dozen pollutants are measured continuously in the stack and about another half dozen are measured occasionally (usually 6 monthly for the first year and then yearly) by spot monitoring – these include heavy metals and dioxins. This is clearly unsatisfactory and since waste operators are warned in advance of a visit, they are handed an opportunity to change to burning cleaner waste which is unrepresentative of the toxic risk, making the exercise largely pointless.

### **The Most Dangerous Pollutants are hardly being Monitored**

Accidental by-passing of pollution control devices by incinerators present very real dangers to people living in the vicinity of incinerators and this danger is compounded by the near absence of monitoring of dioxins. Two episodes serve to illustrate this. A modern state of the art incinerator in Rotterdam was found to be by-passing its pollution control devices 10% of the time emitting dioxins equivalent to 5 times the national limit over the city. In Norfolk, Virginia a similar incident led to dioxin emissions greater than the allowable combined limits for traffic, incinerators and industry for Sweden, Germany and the Netherlands combined. This would cause widespread pollution of an area with dioxin and other persistent pollutants that could last for decades, if not centuries, putting many generations at risk.

Start-ups and shut downs of incinerators give rise to a similar danger. A recent study found that a single incinerator start-up would, on average, generate, *over a 48 hour period*, 60% of the total *annual* dioxin emissions produced during steady state

conditions – in other words 7 months worth of dioxin release within 2 days of a typical start-up. They also found that the levels of dioxins produced by start-ups at some of the incinerators they studied could be twice the annual dioxin emissions under steady state conditions (this is the equivalent of 24 months of dioxin release within 2 days)<sup>320</sup>. The danger to people living in the area is obvious and serious. High levels of dioxins can also be produced during shut-downs and during commissioning (when they are not monitored).

Dioxins are only monitored at 3-12 month intervals and then only for a few hours. This means that dioxins are not monitored 99% of the time. It could therefore be many months before high levels of dioxin emissions were detected perhaps allowing enough dioxin to be released to threaten the health of a whole community and render farms in the vicinity unfit for growing vegetables or rearing livestock. In fact, the operator and the public might never find out and then steps would never be taken to deal with the consequences.

An added problem is that spot monitoring (as is used currently) has been shown in a recent study to be unrepresentative and to underestimate dioxin levels by 30-50 times<sup>321</sup>. The situation is no better with heavy metals. Like dioxins, they are unmonitored for 99% of the time.

Clearly, continuous dioxin monitoring is essential and without such monitoring, incinerators must be regarded as unsafe and a hazard to anyone living in the area. Continuous dioxin monitoring should be mandatory as is the case in some other European countries. Currently, monitoring of the three most important and dangerous pollutants, namely dioxins, heavy metals and PM<sub>2.5</sub> particulates is virtually non-existent in the UK. In the case of PM<sub>2.5</sub> particulates they are not monitored at all – only the far less relevant PM<sub>10</sub> particulates.

Independent monitoring of cement kilns has already demonstrated very high particulate emissions that could seriously endanger health<sup>319</sup>. These releases have been frequent (sometimes 3 times a week), dangerous (reaching 4500µg per cubic metre of PM<sub>10</sub> particulates) and have escaped detection by the regulatory authorities. Clearly, the present regulatory system is not protecting the public.

### **The Standard of Monitoring on the Ground is also Unacceptable**

In addition to monitoring in the stack, there is a requirement to monitor pollutants in the surrounding air. This is normally done by the local council with monitors at ground level. However this is also unsatisfactory. For instance to monitor for safe levels of particulates it would require at least 24 monitors placed at strategic points around an incinerator (assuming the wind is distributed evenly) to achieve a 25% sampling rate, which is the minimum that can be considered acceptable<sup>3</sup>. Typically, there are less than three monitors around most incinerators today. Measurement of heavy metals in the surrounding air, with the exception of lead, is not even required.

### **No Monitoring of Pollutants which have accumulated in the Neighbourhood**

Measuring concentration of pollutants released in the stack gives no information about the levels of toxic material that have accumulated in the vicinity. When the rate of discharge of pollutants into the environment is greater than the ability of the ecosystems to break them down then they must accumulate. We already know that many do not break down for centuries. The excretion rates of many pollutants from the human body are also very poor, for example the *half life* of cadmium in the body is 30 years and for PCBs it is 75 years. Many pollutants, being

fat soluble, will bio-accumulate in living matter at far high concentrations than in the ambient air. A US EPA memo admitted that the risk from accumulation of dioxin in farm animals “could result in unacceptable health risks”. Using a type of risk assessment called screening analysis<sup>322</sup> they calculated that dioxin would accumulate in cattle downwind from an incinerator and that the risk from beef and milk consumption would be 40,000 times the risk from inhalation. This is a massive increase in risk and is in keeping with what we already know about bioaccumulation in other species (see Section 3.4). Monitoring of dioxins in cattle and other farm animals regularly is essential for these reasons. Regrettably it is not being done and therefore consumers of these products are being put at risk. Checks for pollutants in dust, vegetation and in the bodies of local inhabitants are also necessary.

It is sometimes argued that these pollutants don’t matter as they will be carried away in the wind and be someone else’s problem. Sadly this is partly true and that is the reason there is so much pollution in the fragile ecosystem in the Arctic where much of the toxic material ultimately ends up.

### **Monitoring relies on Safety Data derived from Animal Studies**

Animal studies commonly underestimate human vulnerability because of the obvious difficulty in testing cognitive, behavioural and language deficiencies and conditions such as fatigue. In the case of lead, mercury and PCBs, animal studies have underestimated the neurotoxic effect on humans by a factor of 100 to 10,000 times<sup>285</sup>.

### **Monitoring Gives Little Protection to the Foetus**

Average levels or spot monitoring ignores exposures at critical times. The timing of the exposure is often more important than the concentration. Exposures at critical times during foetal growth or infancy are known to produce more serious effects than similar exposures in adulthood and this damage can be permanent. This is well recognised, especially with lead, mercury and PCBs. None of the safety limits has been demonstrated to protect against foetal damage. We know from animal and human studies that toxins have the greatest impact on the foetus and young child. The most vulnerable members of the community are likely to bear the brunt of these toxic releases.

### **Many Pollutants have No Safe Threshold or show Low Dose Toxicity**

Some pollutants such as PM<sub>2.5</sub> particulates, lead and dioxin have no safe thresholds. Most organochlorines are endocrine disruptors and thresholds may not exist for these effects. Monitoring gives little or no protection in these situations. Sometimes low dose studies have shown toxic effects at levels far below the “no effect” level in high dose studies. An example of this is bisphenol A, a plasticizer. Studies showed health effects at levels 2,500 times lower than American EPA’s lowest observed effect, with adverse outcomes including aggressive behaviour, early puberty and abnormal breast growth<sup>220</sup>. Perchlorate produces changes in the size of parts of the brain at 0.01 mg/kg/day but not at 30mg<sup>220</sup>. Aldicarb was found to suppress the immune system more at 1 ppb than it did at 1000ppb. Other chemicals also produce different effects at low dose to what they do at high dose. This shows how very little we know about the dangers of exposing whole populations to chemical pollution.

### **Pollution Offences are Commonplace and Regulation is Poor**

Ten incinerators in the UK committed 553 pollution offences in a two year period, documented in Greenpeace's "A Review of the Performance of Municipal Incinerators in the UK". This appalling record led to only one prosecution by the Environment Agency. There is little point in tighter regulations if they are not enforced. Fines received for pollution offences have been compared to a person on a £50,000 salary receiving a £20 parking fine. This clearly gives waste companies a green light to ignore regulations and pollute with little fear of the consequences. The above data was based on self assessment by the companies concerned.

Levels of emissions achieved under test conditions or when inspections occur by prior arrangements are likely to be far lower than under real life conditions. This was demonstrated in the United States in 1990 when the EPA and Occupational Safety and Health Administration conducted 62 unannounced visits and no less than 69% of inspections led to summons for violations of regulations<sup>323</sup>. (In the UK inspections are by prior arrangement). This makes a strong case for making all visits unannounced.

When an environmental group investigated an incinerator in Indianapolis the situation was even worse. They found it had violated its permits 6,000 times in two years and bypassed its own air control pollution devices 18 times.

In effect, incinerators present inherent and unavoidable hazards to public safety but the extent of the hazards depends on how well incinerators are run. The evidence is strong that they are often run badly. The situation is made worse by weak regulators with little appetite for enforcing public safety.

## **12. Risk Assessment**

One might reasonably expect that, when the decision to build an incinerator is made, all the above information would be carefully taken into account. Sadly this is not necessarily the case. Directors of Public Health, who usually have little knowledge of environmental health, are asked to write an IPPC (Integrated Pollution Prevention and Control) Application Report and give their opinion on the health risks from the proposed incinerator. Typically this decision is based on an inexact method called risk assessment. They tend to rely almost exclusively on this type of assessment and often have little understanding of its limitations.

Risk assessment is a method developed for engineering but is very poor for assessing the complexities of human health. Typically it involves estimating the risk to health of just 20 out of the hundreds of different pollutants emitted by incinerators. It masquerades as a scientific measure but has all the hallmarks of pseudoscience. By pseudoscience we mean assumptions based on false premises:

- 1) **It makes the assumption that any substance emitted but not assessed (this means 99% of all pollutants) should be treated as if they have zero risk.** This assumption is obviously untrue.
- 2) **It assumes wrongly that all pollutants have thresholds below which they are safe.** Science contradicts this. Many pollutants, including dioxins, lead and radioactive particulates do not have thresholds and some may even be more dangerous at lower concentrations (see section 11). An international meeting of neurologists and endocrinologists concluded "Chemical challenges in early life can lead to profound and irreversible abnormalities in brain development at exposure levels that do not produce permanent effects in an adult; there may not be definable thresholds for response to endocrine disruptors"<sup>324</sup>. The

National Research Council concluded in 1992 that “the assumption of thresholds for neurotoxicity was biologically indefensible”<sup>225</sup>.

We might also note that the accepted thresholds for many pollutants have been progressively reduced over the last few decades (including vinyl chloride, ethylene dichloride and six chlorinated solvents) with reductions to between one half and one tenth of the original limits. We can expect further reductions as science progresses.

- 3) **It assumes wrongly that only air emissions need to be considered and bioaccumulation in food can be ignored.** However air emissions may be only the tip of the iceberg. Most food today is contaminated with dioxins, predominantly from past incinerator emissions. As noted in section 11, a leaked report in 1993 from the US Environmental Protection Agency calculated that dioxin would accumulate in cattle in a farm downwind of an incinerator in Ohio posing a risk to the frequent beef consumer which was 40,000 times higher than from inhalation alone. If the incinerator operated for 30 years the cancer risk from eating this beef regularly was calculated to be a massive 1,200 per million, far beyond acceptable risk<sup>322</sup>. We can assume this sort of risk from food produced near most incinerators occurs routinely and yet it is being sold to the public and regulators are turning a blind eye to the danger.
- 4) **It misconstrues lack of evidence on the danger of pollutants as evidence of safety.** The toxic effects of 88-90% of chemicals and pollutants are unknown<sup>325</sup>. It is impossible to assess the risk of substances we barely understand. This is particularly true in relationship to birth and developmental defects. Many pollutants have not even been characterised, let alone assessed for risk.
- 5) **It assumes that health effects such as infertility, immune suppression, altered behaviour and reduced intellectual capacity which are not included in the risk assessment can be ignored.** However there is ample and increasing evidence that many pollutants have just these impacts.
- 6) **It assumes wrongly that ecosystems have the ability to absorb and degrade all environmental pollutants.** Again science contradicts this: many pollutants are known to be persistent and bioaccumulative. In fact, if the rate of input, however small, is greater than the rate at which they break down they must accumulate. It is equivalent to filling up a bucket under a slow dripping tap: sooner or later the water will overflow unless the source of water is stopped.
- 7) **It assumes wrongly that the hazard posed by each individual compound tested out of context and in isolation can predict the hazard of complex mixtures of chemicals.** In the real world pollutants typically occur in combinations and abundant evidence now exists that increased toxicity is common with multiple exposures.
- 8) **It assumes wrongly that the cumulative pollution burden of all the emissions produced by all these facilities can safely be ignored and each facility can be considered in isolation.** It is this type of limited thinking that has led to the contamination of entire ecosystems such as the Great Lakes, Baltic Sea, Mediterranean and Arctic. These pollutants pose global and multigenerational threats to health and ecosystems.
- 9) **It assumes wrongly that we have a comprehensive understanding of the complexity of biological processes and chemical toxicity when in reality**



**there are vast information gaps.** This is why we have been constantly surprised by unpleasant discoveries like endocrine disruption and high body burdens in newborns.

- 10) **It wrongly assumes all people will react in the same way** to pollutants and in particular ignores the fact that the foetus is at far greater risk.

Hidden within this type of assessment is a value judgement about what is an acceptable level of risk<sup>326</sup> and this is not made explicit. For instance what is an acceptable number of birth defects and who is it acceptable to? A cancer risk of 1 per million is typically considered acceptable but may not be acceptable to the person affected by the cancer.

Risk assessment usually involves “modelling”; – dispersion models use an estimation of exposure data, rather than actual exposure data, to assess the impacts of pollutants and their likely distribution. These reports are typically produced by the polluter. The models are not accurate - modelling has a 30% confidence level – this means this technique has only a 30% chance of accurately predicting the ground level concentrations of pollutants - in other words less accurate than tossing a coin. Only about half the predictions are within a factor of two of actual (observed) concentrations and the rest are even less accurate. The models attempt to predict a worst case scenario but the models cannot accurately represent real worst case scenarios which typically occur when there is little or no wind leading to a build-up of pollutants. This means real worst case scenarios can be much worse than predicted<sup>327</sup>. Different models can give very different results.

In addition, present modelling methods are not only inaccurate in estimating ground level pollutant concentration once emitted but they also seriously underestimate the quantities of pollutants emitted. In particular, modelling almost never takes into account secondary particulates formed as the products of combustion rise up the stack. These secondary particulates can double the total volume of particulates (see section 2.1).

Modelling produces the illusion of a scientific knowledge and a certainty that is entirely unjustified by the imprecise nature of modelling and it is based on substantial scientific uncertainty and limited scientific data. It produces a mass of complex mathematical data, which implies unjustified precision, and it is difficult for people not familiar with the mathematics to disentangle the inaccuracies. This was summed up by the head of the EPA Carcinogen Assessment Group, Roy Albert, when he said “Individuals with very different institutional loyalties can produce very different risk assessments from the same materials, where large uncertainties exist.” In other words it is very easy to bias it towards the waste operator. It is often treated by regulators<sup>328</sup> and Directors of Public Health as if it was an accurate assessment. In spite of these severe limitations it is extensively used.

These risks assessments have almost always concluded that incinerators are safe which flies in the face of epidemiological data which shows the opposite. It also flies in the face of the history of chemical use. The latter is littered with examples of chemicals once said to be safe which were later found to have devastating and unanticipated effects, often beyond the worst case scenario (eg DDT, PCBs, CFCs) (see section 7.2).

### **13. Public Rights and International Treaties**

In 2001 the United Nations Commission on Human Rights stated that “*everyone has the right to live in a world free from toxic pollution and environmental degradation*”.

It is unethical that people should die from the emissions from incinerators when safe alternatives are available and for this reason incineration violates Article 2 of the European Human Rights Convention, the Right to Life.

The Stockholm Convention, agreed to by over 100 countries including Britain, in 2001, commits countries to eliminating persistent organic pollutants, including PCB, dioxins and furans, calling for countries to prevent not just the *release* of these pollutants but also their *formation*. The formation of these substances is an inevitable consequence of the use of incinerators. The Convention also requires parties to take measures to reduce the ***total releases*** of these substances (which includes releases to fly ash). It identifies incinerators as primary sources of these compounds. Incineration is, in all these ways, a flagrant violation of the Stockholm convention.

Incineration is also a violation of the Environmental Protection Act of 1990 which states that the UK must prevent emissions from harming human health.

## **14. Conclusions**

- 1) **Incineration does not remove waste.** It simply converts it into another form (gas, particulates, ash) and these new forms are typically more hazardous though less visible than in the original form.
- 2) **Large epidemiological studies have shown higher rates of adult and childhood cancers and of birth defects around incinerators.** Smaller studies and a large body of related research support these findings, point to a causal relationship, and suggest that a much wider range of illnesses may be involved.
- 3) **Recent research has confirmed that particulate pollution, especially the *fine particulate* (PM<sub>2.5</sub>) pollution, which is typical of incinerator emissions, is an important contributor to heart disease, lung cancer, and an assortment of other diseases, and causes a linear increase in mortality.** The latest research has found there is a much greater effect on mortality than previously thought and implies that incinerators will cause increases in cardiovascular and cerebrovascular morbidity and mortality with both short-term and long-term exposure. Particulates from incinerators will be especially hazardous due to the toxic chemicals attached to them.
- 4) Other pollutants emitted by incinerators include heavy metals and a large variety of organic chemicals. **These substances include known carcinogens, endocrine disruptors, and substances that can attach to genes, alter behaviour, damage the immune system and decrease intelligence.** There appears to be no threshold for some of these effects, such as endocrine disruption. The dangers of these are self-evident. Some of these compounds have been detected hundreds to thousands of miles away from their source.
- 5) The danger of incinerating radioactive waste deserves special mention. Incineration converts radioactive waste into billions of radioactive particulates. These particulates make a near perfect delivery system for introducing the radioactive matter into the human body, where it can then act as an internal emitter of alpha or beta radiation. **This type of radiation is qualitatively different, far more dangerous and far more sinister, than background**

**radiation.** There can be no justification for using this method of dealing with radioactive waste.

- 6) **Modern incinerators produce fly ash which is much more toxic than in the past**, containing large quantities of dioxin-rich material for which there is no safe method of disposal, except vitrification, a method not being used in the UK. Disposal of incinerator ash to landfill sites is associated with long-term threats to aquifers and water tables and the potential for accidents serious enough to require evacuation of an area.
- 7) **The risks to local people that occur when incinerators operate under non-standard working conditions have not been addressed**, particularly the emissions at start-up and shutdown which may be associated with the release, within 2 days, of more dioxin than over 6 months of working under standard conditions.
- 8) **The greatest concern is the *long-term* effects of incinerator emissions on the developing embryo and infant, and the real possibility that genetic changes will occur and be passed on to succeeding generations.** Far greater vulnerability to toxins has been documented for the very young, particularly foetuses, with risks of cancer, spontaneous abortion, birth defects or permanent cognitive damage. A worryingly high body burden of pollutants has recently been reported in two studies of cord blood from new-born babies.
- 9) **Waste incineration is prohibitively *expensive* when health costs are taken into account.** A variety of studies, including that from the government, indicate that a single large incinerator could cost the tax payer many million of pounds per annum in health costs. Put simply, the government's own data is demonstrating that incinerators are a major health hazard. With the predicted inclusion of the waste industry within the EU European Emissions Trading Scheme, local taxpayers, in areas with incinerators, will not only have to live within a polluted area but will be saddled with costs, under ETS, of millions of pounds per annum to pay for it.
- 10) **Waste incineration is unjust because its maximum toxic impact is on the most vulnerable members of our society, the unborn child, children, the poor and the chemically sensitive.** It contravenes the United Nations Commission on Human Rights, the European Human Rights Convention (the Right to Life), and the Stockholm Convention, and violates the Environmental Protection Act of 1990 which states that the UK must prevent emissions from harming human health.

## **15. Recommendations**

- 1) The safest methods of waste disposal should be used.
- 2) Health costs should be routinely taken into account when deciding on waste disposal strategies.
- 3) The present limited method of risk assessment by which the safety of proposed installations is judged, is inadequate, can easily be biased towards the waste operator, cannot be relied on, and should be reviewed.
- 4) Tackling the problems of both the amount and the nature of waste generated is of critical importance, with the emphasis on reducing the production of waste, and on recycling.

5) The serious health consequences of fine particulate pollution have become apparent in the last ten years: incinerators are a significant source and, for this reason alone, in our considered opinion, incineration is the least preferred option for getting rid of waste. Taking into consideration all the information available, including research indicating that there are no safe levels for fine particulates, the increasing amount of plastic and related substances in the waste stream and the highly toxic ash produced by modern incinerators, we can see no reason to believe that the next generation of incinerators would be substantially safer than the previous ones.

6) **Far safer alternative methods are now available** including recycling, mechanical biological treatment, aerobic digestion and plasma gasification: a combination of these would be safer, would produce more energy, would be cheaper than incineration in the long run and would be much cheaper when health costs are taken into account. Thermal methods should only be used for residual, non-recyclable waste and the safest thermal method should be chosen: currently this is plasma gasification. This not only produces more energy but can use plastics as a resource. These more advanced methods should be employed.

7) **This report draws attention to the many deficiencies and poor quality of the present monitoring procedures.** We recommend the introduction of a far stricter and more comprehensive system for the monitoring of all waste-burning plants by a fully independent body, including random unannounced visits: the monitoring should include:

- a) **Continuous monitoring of dioxins – this is an absolute essential and, not surprisingly, is mandatory in some countries.** This vital step is essential because of the extremely toxic nature of the pollution emitted when incinerator pollution control devices are by-passed. The UK should not have the second rate safety standards that they have at present.
- b) Continuous monitoring of PM<sub>2.5</sub> particulates and monitoring of PBDEs.
- c) A comprehensive system of monitors set up by Councils around all incinerators to measure particulates and heavy metals.
- d) **Monitoring of dioxin in all livestock within a 5 mile radius of incinerators due to the known and serious risk from bioaccumulation in food.**
- e) Periodic monitoring of the heavy metals and dioxins in the fly ash
- f) A programme of monitoring the body burdens of some key pollutants in local inhabitants.
- g) Periodic monitoring of the content of dust in homes in the locality

8) It is particularly important that incinerators should not be sited in deprived areas or areas with high rates of mortality where their health impact is likely to be greatest. This can only add to health inequalities. (NB. Presently 9 out of 14 incinerators have been built in the most deprived 20% of wards<sup>329</sup>).

9) The present subsidies and tax advantages, which favour incineration, should be removed. A ban or tax on recyclable material going to incinerators or landfill deserves

serious consideration. It is nonsense to regard bottom ash, with its significant dioxin content, as an inert substance and it should incur landfill tax at a higher rate.

**10) We recommend that no further waste incinerators be built.**

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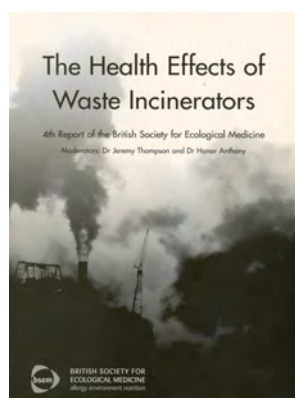
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*(This article is also available as a booklet. For a copy please contact BSEM)*



From: Tony Hicks  
Sent: 24 May 2018 16:21  
To: Peter Catchpole  
Cc: Jeremy QUIN; Louise Goldsmith  
Subject: Horsham incinerator

Horsham Incinerator

Dear sir

I am now convinced that we are heading into a world of fantasy over the planning of this Horsham incinerator As I have stated in the past we see an emotional approach rather than a scientific one.

Britannia crest quotes Sir David Attenborough and the blue planet .We see plastic waste washed up on our shores and much is created from both passing shipping and from other countries this all adds to sea pollution.

The first statements from Britannia crest was that this incinerator would not burn Toxic waste and yet they are now beating the drum of burning plastics .As we know all plastics are Hydrocarbons and when burnt give off toxins including Dioxins and PCB's even the fly ash which will need to eventually go to landfill will be a toxic.

Well maintained incinerators with good filtration will cut out many Toxins reaching the atmosphere but these filters still have to be disposed of as well as contaminated water so incineration is not a free trip.

In Horsham we do not have the resource to support an Incinerator of this size although incineration is the answer to our waste disposal issued in this small country.

It is not in my back yard (NIMBY) approach that we need but a solution .

We see many applications applied for in the country as can be seen on [ukwin.org.uk/map/](http://ukwin.org.uk/map/) many have been rejected or still in limbo .We see most applications that are viable situated on the coast this because of offshore winds and large water supplies that these incinerators require.

The most successful waste to Energy incinerators are managed by Grondon and Veolia so why do we need new kids on the block with Britannia crest who have little or no experience in this field I find the arguments of Britannia crest a little childish and they are only interested in monetary gain and have little or no interest in Sussex. They speak about PPE and the legacy debts that are incurred but I still think that although this is a private enterprise we the county and residents will be stuck with some debt.

I have stated before that to keep an incinerator of this size fueled by domestic waste is a myth as domestic waste has little or no caloric value so it will require toxic hi value fuel .This will have to be imported and probably by road from other counties as we see no rail head in their proposal.

I have proposed to Louise Goldsmith that a sum of money should be lodged with the Council against any litigation that may occur my thought were in the region of 10 million and this will make sure that Britannia crest and the EA is focused on getting it right first time.

Many thanks for your efforts for tackling all issues in your ward I am sure it is appreciated

Regards Tony Hicks

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 NO<sub>2</sub> 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 NO<sub>2</sub> 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 NO<sub>2</sub> reductions, we can give the applicant the benefit of applying this reduction of HGV movements to total NO<sub>2</sub> emissions. Assuming that Britaniacrest intend to operate HGVs fitted with NO<sub>2</sub> abatement conforming to Euro X1 standard, as they should, NO<sub>2</sub> 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 NO<sub>2</sub> emissions of 62,856 grams, or approximately 63 kgs.
3. Let us now look at the NO<sub>2</sub> 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<sub>x</sub> 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<sub>x</sub> emissions of around 305 tonnes per year. Applying the applicant's suggestion that 70% of the NO<sub>x</sub> will be converted to NO<sub>2</sub> (Para 7.3.37) as it descends to ground level, we can assume that roughly 213 tonnes of NO<sub>2</sub> 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<sub>x</sub> emissions.
6. However, the fact that the NO<sub>2</sub> 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 CO<sub>2</sub> 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 NO<sub>2</sub> 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 CO<sub>2</sub> 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 NO<sub>2</sub> emissions, when in fact the incinerator will generate a very significant increase in NO<sub>2</sub> levels without any justification.





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**UNITED KINGDOM WITHOUT  
INCINERATION NETWORK**

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**Britaniacrest Recycling Ltd Application for  
Former Wealden Brickworks (Site HB),  
Langhurstwood Road, Horsham  
West Sussex RH12 4QD**

***Application Reference: WSCC/015/18/NH***

**UKWIN Objection and  
Request for R1 Planning Condition**

*"Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure"*

**April 2018**

## Introduction

1. The United Kingdom Without Incineration Network (UKWIN) was founded in March 2007 to promote sustainable waste management. Since its inception, UKWIN has worked with more than 120 member groups.
2. As part of fulfilling our aims and objects, UKWIN works to help facilitate access to environmental information, public participation in environmental decision-making, and access to justice in environmental matters. Where relevant we also make representations to consultation exercises to help ensure that relevant matters are considered.
3. In addition to **objecting** to the proposal, this submission also asks that further information be requested of the applicant by the Waste Planning Authority (WPA) and that, if planning permission is granted, a Design Stage R1 Planning Condition is attached in line with the condition previously imposed by the Secretary of State.

## Relevant Government Statements in Relation to Climate Change

4. Incineration is known to exacerbate climate change by releasing CO<sub>2</sub> when waste is burned. According to the Environment Agency: *"Between 0.7 and 1.7 tonnes of CO<sub>2</sub> is generated per tonne of MSW [Municipal Solid Waste] combusted"*.<sup>1</sup>
5. The importance of understanding the specific technology being proposed as well as the net carbon impacts of the proposed facility compared to alternatives and the importance of understanding the assumptions regarding feedstock volume and composition, and how these are expected to change over time, is underscored by the Government's 2011 Review of Waste Policy.
6. We note, for example, that Paragraph 209 of the 2011 Waste Review states that: *"...while energy from waste has the potential to deliver carbon and other environmental benefits over sending waste to landfill, energy recovery also produces some greenhouse gas emissions. It is important to consider the relative net carbon impact of these processes, and this will depend on the composition of feedstocks and technologies used"*.

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<sup>1</sup> According to page 5 of the Environment Agency's "Pollution inventory reporting – incineration activities guidance note Environmental Permitting (England and Wales) Regulations 2010 Regulation 60(1)", Version 4 December 2012 available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296988/LIT\\_7757\\_9e97eb.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296988/LIT_7757_9e97eb.pdf) "Between 0.7 and 1.7 tonnes of CO<sub>2</sub> is generated per tonne of MSW [Municipal Solid Waste] combusted".

7. Similarly, Paragraph 230 of the 2011 Waste Review states: "*Waste infrastructure has a long lifetime and therefore changes in the composition and potential volumes of waste in the future cannot be ignored in the development and selection of technologies now*".
8. The adverse environmental implications of waste incineration include the exacerbation of climate change through the release of greenhouse gas (GHG) emissions.
9. For the facility proposed for Horsham, with its 180,000 tonne per annum capacity, this equates to between about 126,000 tonnes and nearly 306,000 tonnes of CO<sub>2</sub> released for each year of operation, or potentially more than around **9 million tonnes of CO<sub>2</sub>** over the anticipated 30 year operational period.
10. This should weigh heavily against the proposal.
11. UKWIN notes the explanation in the Government's EfW Guide that: "*Fossil based residual wastes, e.g. plastics that cannot be recycled, do not decompose in the same way as biogenic material in landfill. For these waste streams conventional energy from waste will almost always deliver a negative carbon balance compared to landfill...*"<sup>2</sup>
12. The applicant appears to have compared the proposed incinerator with sending the waste directly to landfill, without first being bio-stabilised, e.g. via an appropriate Mechanical Biological Treatment (MBT) process.
13. Highlighting the relative impacts of incineration and of sending waste to MBT prior to landfill, DEFRA's Waste Economics Team noted that: "*MBT-landfill provides the best emissions performance in terms of the treatment/disposal of residual waste. It essentially involves landfilling somewhat stabilised wastes with some material recovery. The magnitude of the environmental impact depends on the extent to which the waste is stabilised*".<sup>3</sup>
14. Even when waste is sent directly to landfill (without appropriate pre-treatment), there are various factors that are sometimes overlooked in modelling exercises in terms of the carbon sequestration effects of landfilling waste.

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<sup>2</sup> DEFRA's "Energy from waste: A guide to the debate", February 2014 (revised edition), available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/284612/pb14130-energy-waste-201402.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf)

<sup>3</sup> DEFRA's "The Economics of Waste and Waste Policy", June 2011, available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69500/pb13548-economic-principles-wr110613.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69500/pb13548-economic-principles-wr110613.pdf)

15. As noted in the Government's aforementioned EfW Guide: *"...considering the landfill route, all the fossil carbon stays in the ground and doesn't break down. The fossil carbon is sequestered, as is potentially up to half of the biogenic carbon depending on the exact conditions in the landfill"*.
16. The impacts of biogenic carbon releases being avoided, sequestered or delayed in landfill compared to being immediately released as the result of incineration is erroneously omitted from some assessments of relative net emissions, and these omissions improperly favour incineration in such assessments.
17. On 3<sup>rd</sup> August 2015 Planning Inspector Mel Middleton decided to dismiss an appeal for a circa 140,000 tonne per annum incinerator proposed for the Former Ravenhead Glass Warehouse and other land at Lock Street, St. Helens, Merseyside WA9 1HS (Appeal Ref: 2224529, 'the Lock Street decision'). One of the issues material to the refusal was the poor *"carbon credentials"* of the plant - this was deemed to conflict with relevant local and national policies.
18. Paragraph 30 of the Lock Street decision states: *"In certain circumstances generating electrical energy from waste can contribute to carbon emissions to a greater extent than depositing the same material as landfill. It is therefore not a simple exercise to demonstrate that an EfW will have a positive effect on overall carbon emissions..."* (emphasis added)
19. Paragraph 19 of the Government's EfW Guide clearly states that: *"...residual waste also contains wastes from 'fossil' sources (oil etc.) such as plastic. Therefore when energy is recovered from mixed residual waste it is considered to be only a partially renewable energy source"*. (emphasis in original)
20. In January 2018 Resource Minister Dr Thérèse Coffey, responding on behalf of the Department for Environment, Food and Rural Affairs (DEFRA) to a Parliamentary Question made clear that: *"A comparison of the CO<sub>2</sub> impact of waste going to energy from waste and landfill is included in the analysis of the 2014 report 'Energy recovery for residual waste: A carbon modelling based approach'. No formal analysis has been undertaken since this report was published"*.<sup>4</sup>

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<sup>4</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-01-22/124194/>

## Climate Change Impacts of the Proposal

21. It is noteworthy that the applicant has not followed the methodology set out in 'Energy recovery for residual waste: A carbon based modelling approach' and does not justify their choice to deviate from the central assumptions of the Government-based approach.
22. UKWIN notes Paragraph 2.20.1 of Volume 1 Chapter 2 of the applicant's Environmental Statement (ES) explains that: *"A greenhouse gas assessment of the proposed thermal treatment facility, based on an estimate of its operational carbon footprint has been undertaken and is included at Appendix 2.3"*. UKWIN also notes that the Appendix 2.3: Carbon Assessment is in fact a report that was *"prepared to accompany the 2016 application"*.
23. The analysis contained within Appendix 2.3 fails to adequately set out all of the assumptions and methodologies applied and all of the underlying data and associated justifications for using those assumptions and methodologies.
24. Furthermore, some of the statements made within Appendix 2.3 appear to be contradictory, confused, and/or simply out-of-date.
25. If some of the omissions in the assessment are corrected then it appears that the development would have a significant adverse GHG impact, and therefore either additional information should be sought from the applicant or the application should be determined on the basis that climate change benefits have not been demonstrated and significant adverse change impacts have not been ruled out.
26. In relation to errors, it appears that the applicant and their consultants made a simple 'unit of measurement error' that results in an overstatement of emissions avoided through reduced transport by a factor of one thousand, i.e. the applicant's figure of 110,315 kilograms per annum was erroneously treated as if it were 110,315 tonnes per annum.
27. At Paragraph 9.6 of the applicant's 2016 Carbon Assessment the applicant adopts a '0.70' conversion factor, stating: *"Therefore the impact of the 3R Facility is to reduce vehicle-Kilometers by 157,140 Km per year, and from the Department of Energy & Climate Change standard set of GHG conversion factors 2016 for all HGVs (diesel), the CO2 conversion factor is 0.702022 per Km"*.
28. The unit of the 0.70 CO2 is not stated by the applicant, but if one goes back to the DECC source document it is noted to be 0.70 kilograms of CO2e per kilometre.

29. To quote the DECC spreadsheet: *"All conversion factors presented here are in units of 'kilograms of carbon dioxide equivalent of Y per X' (kg CO<sub>2</sub>e of Y per X), where Y is the gas emitted and X is the unit activity. CO<sub>2</sub>e is the universal unit of measurement to indicate the global warming potential (GWP) of GHGs, expressed in terms of the GWP of one unit of carbon dioxide".*
30. As per DECC's source spreadsheet, the standard set conversion factor cited is 0.70kgCO<sub>2</sub>e/km (equating to only 0.0007tCO<sub>2</sub>e/km), but the applicant appears to be working on the basis that the factor is expressed in tonnes (0.70tCO<sub>2</sub>e/km), which is one thousand times higher than DEC's actual figure.
31. This means that the result of applicant's calculation of 157,140km x 0.70 is actually 110,315 kilograms of CO<sub>2</sub> avoided per annum, i.e. only 110 tonnes of CO<sub>2</sub> per annum. However, Table 3 of the 2016 Carbon Assessment uses the 110,315 kilogram figure as if it were 110,315 tonnes rather than 110 tonnes.
32. Over the expected lifetime of the plant this mistake with transport emissions adds up to overstating avoided emissions by more than **2.75 million tonnes of CO<sub>2</sub>** ((110,135 - 110) x 25).
33. In relation to inconsistencies, Paragraph 5.3.6 of the applicant's 2016 Carbon Assessment (Appendix 2.3) talks about *"21 MW recovered as electricity and exported to the grid at a net efficiency of **28.4%**".* This is clearly not consistent with Paragraph 8.4 of the Planning Supporting Statement, which states that *"18 MW would be available for export to the national grid".* (emphasis added)
34. Another inconsistency is that the Executive Summary of the Planning Statement says that the proposal involves: *"Generating 21Mw of renewable energy to be transported to the local distribution network"* which, based on statements that the gross generation capacity is 21MW, implies that 100% of the feedstock (and therefore 100% of the energy) would be renewable, whereas the composition in Table 1 of the 2016 Carbon Assessment states that the feedstock would include non-renewable fossil-based material such as plastic.
35. The applicant has not explained how they get from the energy content of their proposed feedstock composition to their claimed level of electricity export.
36. Their claimed composition in Table 1 of the 2016 Carbon Assessment includes a high proportion (44.75%) of putrescibles which tend to contain less energy than high-calorific value (CV) feedstocks such as plastic.

37. As Footnote 31 of the Governments' EfW Guide notes: *"Some wet [i.e. putrescible] wastes e.g. food are not particularly suitable for energy from waste"*.
38. The following assumptions have been adopted in order to attempt to reconcile these inconsistencies for the purpose of producing an indicative, partially corrected, version of the applicant's Table 3 'Summary of estimated emissions (tCO<sub>2</sub> equivalent per annum)':
- a. The properties of the feedstock (e.g. calorific value, proportion of biogenic carbon, etc.) are assumed to be those set out in the Government's 'Energy recovery for residual waste: A carbon based modelling approach', using the input waste composition data given by the applicant in Table 1 of their 2016 Carbon Assessment; and
  - b. The applicant's 28.4% efficiency figure (based on generation of 21 MW) is for gross efficiency, and their 18MW export figure implies a net efficiency of 24.3%; and
  - c. The applicant's assumed 44.75% of putrescibles in the feedstock would be comprised of garden waste; and
  - d. As the assessment is intended to examine the impact of incineration versus landfill, the model below assumes that material recovery would occur irrespective of the final treatment option (and therefore the -37,684 figure for 'Materials Recovery' has been excluded from the calculations).
39. If one were to consider the impact of Materials Recovery then the correct approach would be to use a counterfactual of MBT-Landfill, which would not only recover recyclables prior to landfill but which would also bio-stabilise the waste sent for landfill and therefore reduce the emissions of methane from landfill and increase the 'biogenic carbon sink' benefit of landfill.
40. This would result in the proposal performing even worse than landfill than is shown in the partially corrected modelling below.
41. Indeed, given the high quantity of putrescible waste it would also be appropriate to include separately collecting this feedstock for composting and anaerobic digestion (AD) as part of an alternative treatment scenario.
42. The proposed facility's performance against a composting/AD counterfactual would be even worse than comparison with MBT-Landfill.

43. In addition to the errors set out above, and in addition to inconsistencies in relation to both efficiency and uncertainties regarding composition highlighted above, we would like to draw attention to two further significant problems with the applicant's 2016 carbon assessment, as follows:
- a. The incorrect marginal emissions factor (MEF) is used; and
  - b. The biogenic carbon sequestration benefits of landfill are not accounted for.
44. Paragraph 6.2 of the 2016 Carbon Assessment states that the modelling assumes a 2016 conversion factor of 0.41205 kgCO<sub>2</sub>e/kW, which in Table 3 is multiplied by 168,000 kWh to provide displaced electricity generation of -69,224.
45. Applying the 2016 conversion factor is not consistent with the most recent Government guidance from December 2017.
46. As explained in DEFRA's 'Energy recovery for residual waste: A carbon based modelling approach' (February 2014): "...we should use the marginal energy mix which represents the carbon intensity of generating an additional kW of electricity..." (emphasis added)
47. Footnote 29 of the Government's 2014 EfW Guide states that: "*When conducting more detailed assessments the energy offset should be calculated in line with DECC guidance using the appropriate marginal energy factor*". (emphasis added)
48. The DECC guidance has now been taken up by BEIS, DECC's successor. The appropriate marginal energy factor (MEF), i.e. the generation-based long-run MEF, is provided in BEIS' Green Book supporting data tables.
49. According to Table 1 of the Green Book's supporting data tables (Department for Business, Energy & Industrial Strategy (BEIS), December 2017), the generation-based long-run marginal emissions factor for new energy generation facilities entering commissioning in 2020 is 0.270 kg CO<sub>2</sub>e/kWh and the 2020 generation-based grid average is 0.181kg CO<sub>2</sub>e/kWh.
50. When the Government's 0.270 kg CO<sub>2</sub>e/kWh MEF for 2020 is applied, with an assumed net efficiency of 24.3% alongside using an energy input (of around 2.58 MWh/t) based on the applicant's Carbon Assessment Table 1, then the applicant's -69,224 figures becomes **-30,474 tCO<sub>2</sub> equivalent per annum** (i.e. 180,000 tonnes x 2.580427 x 0.243 x 0.270).
51. In addition to using the correct MEF, the comparison should also properly account for biogenic sequestration in landfill.



52. Whilst the applicant assumes that half of the biogenic carbon is sequestered in landfill, and whilst the applicant uses this assumption to reduce the assumed quantity of methane released from landfill, the applicant fails to follow best practice by neither crediting landfill with 'negative emissions' for this sequestered biogenic material nor including the additional release of this biogenic carbon on the incineration side of the equation.

53. As noted in the evidence-based recommendations of Eunomia's 2015 report entitled 'The Potential Contribution of Waste Management to a Low Carbon Economy': *"All lifecycle studies engaged in comparative assessments of waste treatments should incorporate CO2 emissions from non-fossil sources in their comparative assessment"*.<sup>5</sup>

54. Eunomia's report also explains that: *"In comparative assessments between waste management processes, it cannot be considered valid to ignore biogenic CO2 emissions if the different processes deal with biogenic CO2 in different ways..."*

55. As stated at Paragraph 18 of DEFRA's 'Energy recovery for residual waste A carbon based modelling approach' (February 2014): *"...some biogenic carbon that would be released in energy recovery is sequestered in landfill"*.

56. DEFRA's document goes on to explain, at Paragraphs 171-173, how: *"...the model assumes that not all of the biogenic material decomposes in landfill but it is all converted to CO2 in energy from waste. Landfill therefore acts as a partial carbon sink for the biogenic carbon. This is a potential additional benefit for landfill over energy from waste. There are two ways to account for this additional effect:*

- *Estimate the amount of biogenic carbon sequestered and include the CO2 produced from the same amount of carbon in the EfW side of the model (or subtract it from the landfill side)*
- *Include all carbon emissions, both biogenic and fossil on both sides of the model*

*While both approaches would address the issue of sequestered biogenic carbon the first would potentially be the better solution as it would avoid double counting carbon with other inventories." (emphasis added)*

57. When the biogenic sequestration in landfill is taken into account, using the same waste composition data as above and the same MEF of 0.270 as above, the

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<sup>5</sup> <https://zerowasteurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/>

applicant's -76,505 figure for Landfill Diversion becomes **-3,892 tCO<sub>2</sub> equivalent per annum**.

58. It should be noted that the -3,892 tCO<sub>2</sub>e/annum figure is derived using the central assumptions from DEFRA's Carbon Based Modelling Approach, e.g. in relation to landfill gas engine efficiency.

59. Correcting these issues has a material impact on the conclusions of the carbon modelling that should weigh heavily against the proposal in the planning balance.

60. These adjustments are summarised in the Partially Corrected Table 3 below:

**Partially Corrected Table 3**

<b>Emissions Source</b>	<b>Proposed Facility Electricity only (uncorrected)</b>	<b>Proposed Facility Electricity only based on 24.3% net efficiency (partially corrected)</b>
<b>Process</b>	+50,955	+50,955
<b>Transport</b>	-110,315	-110 <sup>[i]</sup>
<b>Avoided CO<sub>2</sub></b>		
<b>Displaced Electricity Generation</b>	-69,224	-30,474 <sup>[ii]</sup>
<b>Materials Recovery</b>	-37,684	Not applicable <sup>[iii]</sup>
<b>Landfill Diversion</b>	-76,505	-3,892 <sup>[iv]</sup>
<b>Total</b>	-242,773	+16,479

[i] Corrected to account for the applicant's 'unit of measurement error', as explained in Paragraphs 26 - 32 above.

[ii] Corrected to apply an assumed net efficiency of 24.3% while applying the correct MEF of 0.270 (rather than the applicant's 0.412 conversion factor)

alongside using an energy input based on the applicant's Carbon Assessment Table 1, as explained in Paragraphs 33 - 50 above.

[iii] As per Paragraph 38 (d) above.

[iv] Corrected to account for biogenic sequestration in landfill (applying assumption's from DEFRA's Carbon Based Modelling Approach), as explained in Paragraphs 51 - 58 above.

61. Therefore, based on a partially corrected version of the applicant's own estimated emissions scenario, sending the waste to the proposed incineration facility would be **16,479 tcO2e per annum worse** than sending that same waste directly to landfill.

62. Other problems that we have observed in relation to the applicant's 2016 carbon assessment include:

- a. the transport assumptions (which appear to overstate the benefits of incineration, and which do not take account of diesel vehicles being replaced with electric vehicles during the lifetime of the proposed facility); and
- b. the landfill gas engine efficiency (which appear to overstate the benefits of incineration).

63. As should be clear from the issues raised above, the conclusions of the applicant's 2016 carbon assessment cannot be relied upon to provide an accurate description of the likely environmental impacts of the proposal.

64. Problems inevitably arise from the applicant's fundamental failure to correctly follow an accepted methodology applying a set of justified assumptions. We hope that these problems will be resolved as part of any revised climate change assessment required of the applicant by the WPA.

65. Alternatively, we would expect the WPA to determine the application on the basis that the proposal would contravene the strategic objective to minimise carbon emissions, and would therefore go against Waste Local Plan SO 14 as well as other local and national plans and policies in relation to carbon emissions and climate change.

## R1 Planning Condition

66. ES Volume 1, Chapter 2 states: *"2.4.18 The efficiency of the facility determines the remaining energy available for export. It is not possible at this stage to state what the exact efficiency would be, but it would be more than sufficient to meet the energy efficiency requirement for a recovery facility of 0.65 set out in the Waste Framework Directive (2008/98/EC). In consequence the facility would qualify as "recovery" under Article 3 of the Directive."*
67. The facility proposed for Horsham should, if granted planning consent, be given a Design Stage R1 Planning Condition in line with previous decisions by the Secretary of State and other local authorities to promote movement of waste management up the Waste Hierarchy, in line with local and national policies.
68. Appendix A of the National Planning Policy for Waste sets out a five-step waste hierarchy, with the bottom tiers being 'Other Recovery' followed by 'Disposal'.
69. The accompanying footnote states that: *"The full definition of each level of the waste hierarchy is set out in Article 3 of the revised Waste Framework Directive (2008/98/EC)".*
70. As set out in the Government's EfW Guide and as elaborated upon in further detail in the European Commission's *'Guidance on the interpretation of key provisions of Directive 2008/98/EC on waste'*, inefficient Energy from Waste (EfW) plants are classified as 'Disposal' at the bottom of the Waste Hierarchy rather than as 'Other Recovery', even in cases where some energy is generated.
71. UKWIN draws the WPA's attention to the Secretary of State imposed Condition 16 for the Bilsthorpe Energy Centre (PINS Ref. 3001886).
72. That condition states: *"Prior to the development hereby permitted being brought into use, the operator shall submit to the Waste Planning Authority for approval in writing, verification that the facility has achieved [Design] Stage R1 Status through Design Stage Certification from the Environment Agency. The facility shall thereafter be configured in accordance with these approved details. Once operational, alterations to the processing plant may be undertaken to satisfy Best Available Technique or continued compliance with R1".*

73. Indeed, it is currently a matter of course to impose Design Stage R1 Planning Conditions. For example:

- a. **Birmingham City Council** - Rolton Kilbride's 105ktpa gasification plant at Castle Bromwich. Condition 32 of 2015/09679/PA.
- b. **West Sussex County Council** - Grundon's Circular Technology Park. Condition 24 of WSCC/096/13/F.
- c. **Warwickshire County Council** - Rolton Kilbride's Hams Hall gasification plant - Condition 21 of NWB/16CM011
- d. **Bradford City Council** - Endless Energy Ltd's 90ktpa RDF plant in Keighley. Condition 45 of 16/06857/FUL.
- e. **Selby District Council** - Kingspan's 132tktpa RDF plant in Sherburn in Elmet. Condition 23 of 2016/1456/EIA
- f. **Nottingham City Council** - Chinook Sciences' 160ktp plant in Bulwell. Condition 20 of 13/03051/PMFUL3

### **Previous UKWIN Comments on Planning Committee Report**

74. UKWIN draws the WPA's attention to UKWIN's comments made in relation to Application Reference: WSCC/062/16/NH in general, and in particular the comments from UKWIN's Technical Adviser Tim Hill C Eng made on 30<sup>th</sup> January 2017 and 8<sup>th</sup> June 2017 as follows:

- a. *Referring to the Planning Statement Appendix G Carbon Assessment, the Applicant has (a) failed to make available supporting calculations setting out the carbon effects of start up fuel and imported electricity / electricity generated within the plant, and (b) assumed that electricity generation emission avoided by production of electricity at the proposed ERF is 0.41205 kgCO<sub>2</sub>e/kWh electricity generated. This is incorrect...*
- b. *The applicant's analysis presents a misleading picture and until the aspects above have been taken account of and included, it cannot be assumed that the proposed facility represents an improvement over landfill.*
- c. *The applicant has failed to clarify the basis on which their net overall energy efficiency figure. The applicant should be asked to make available (i) an Energy flow Sankey diagram and (ii) a heat flow diagram.*
- d. *...I note that, in relation to Paragraph 4.20 of the Planning Officer's report, the statement that: "The Environment Agency would control the efficiency of*

*the facility to ensure that the process qualifies as 'recovery' (in accordance with the R1 formula, referred to in representations) and to optimise the amount of electricity available for export outside of the facility." is fundamentally flawed. The Environment Agency (EA) does not control the efficiency of a waste incineration facility. Based on the relevant design data that should have been submitted by the applicant as part of the planning application, and any further information that would be required by the EA as part of a bespoke R1 application, the EA will indicate if the proposed incinerator can be expected to achieve an R1 value of 0.65 (recovery status) or (if less than 0.65) it retains its disposal status. The planning committee should, prior to the Tuesday 18 July 2017 meeting, be made aware that, if minded, notwithstanding the planning officers recommendation to refuse, to consent, then a condition should be set to the effect that consent is dependent on the EA deciding that, based on the design data, an R1 value of 0.65 or greater can be expected.*

## **UKWIN Comments on the Applicant's Air Quality Assessment**

75. UKWIN notes that Table 7.8: Mass Emissions from the applicant's Environmental Statement (ES) Volume 1, Chapter 7 on Air Quality and Odour appears to omit figures for total organic carbon (TOC) despite the fact that emissions are limited by the Industrial Emissions Directive (IED) and despite the fact that the applicant themselves include benzene as a main air pollutant (e.g. at Paragraph 7.2.18).
76. UKWIN urges the WPA to ask the applicant to provide TOC data, expressed as benzene (i.e. assuming all TOC is benzene), in accordance with standard practice and with IED requirements and with the relevant requirements of Environmental Impact Assessment legislation.
77. In relation to the applicant's attempt to assess emissions associated with a 'worst case scenario' UKWIN draws attention to Paragraphs 7.2.4 and 7.3.39 of the applicant's ES Volume 1, Chapter 7.
78. Paragraph 7.2.4 states: "For the purposes of this assessment for those pollutants having only one emission limit (for a single averaging period), the facility has been assumed to operate at that limit".
79. Paragraph 7.3.39 states: "As there are 8,760 hours in a non-leap year, the hourly-mean concentration would need to be below 200 µg.m<sup>-3</sup> in 8,742 hours, i.e. 99.79% of the time".

80. It should be noted that the limits set out in 'Table 7.1: Relevant Industrial Emission Directive Limit Values' can be exceeded not only during start-up and shut down but also during normal operation.
81. The standard way that the Environment Agency (EA) would assess monitored emissions against the Emissions Limit Values (ELVs) is to subtract the uncertainty of the measurement from the value and to compare this lower figure against the ELV.
82. This means that the greater the level of uncertainty the lower the assumed emissions when compared to the ELV. Subtracting uncertainty in this way would imply that actual emissions could exceed the ELV by a greater margin than is allowed for by the applicant in their 'worst case scenario' assessment, e.g. by twice the 'uncertainty budget' allowed for under the ELV.
83. As such, the applicant's proposed 'worst case' scenarios could be significantly underestimating the potential permitted emissions from the plant.

Dear Councillor Crow

wsc/015/18/nh

We would urge you to vote NO to the planning application for this vast incinerator with a 90m+ stack which will be visible from 15kms away; to be built in a largely rural area close to areas of outstanding natural beauty and historic buildings. It is out of proportion to the environment.

Planning officers have failed to ask the applicant for a more comprehensive need assessment

Planning officers have failed to explain the ongoing debate over disposal of waste in the UK. Planning officers have failed to explore the question of overcapacity in the incinerator industry

Planning officers have failed to explain the stalling of recycling in favour of burning of materials in areas where incinerators operate.

Planning officers have failed to ask the applicant for evidence to justify their claims of lower NO2 emissions. In fact the information in the application suggests there will be a very significant increase in NO2 emissions

Planning officers have incorrectly stated that R1 (recovery status) will be ensured by the Environment Agency despite receipt of clarification from the Agency that this was NOT the case

This application does not comply with WSCC's own Waste Local Plan as follows Strategic Objective 5,7,8,9, 10 and 13.

All this at a time when the Government's own Chief Scientific Advisor to the Department for Environment, Food and Rural Affairs warned against further investment in Incinerators in the UK whilst speaking at a meeting of Parliament's EFRA Committee on the 31st January THIS YEAR . David Attenborough has written to support the campaign against the incinerator stating that incineration is not sustainable and is the least environmentally friendly option.

Your children and grandchildren deserve better than to be saddled with this greedy incinerator which will work 24/7 polluting our atmosphere, our skies and ruining our countryside. We will become the rubbish bin of the South East with waste being brought in from all over the area - possibly even from abroad. Please listen to the people and not to a few people in the planning department. Think of how you will feel in 10, 15,20, 25, 30 years every time you see that stack. Be proud to VOTE NO.

Thank you

David Dunnington 14 Parkside Mews

John Farrell 11 Parkside Mews

Adrienne Evans 6 Parkside Mews

Shaunna Henning 11 Parkside Mews

RH12 2sa



Councillors,

I again write to you to object in the strongest terms to the planning application WSCC/015/18/NH.

I was bitterly disappointed to read the recent WSCC planning committee response to this application and can see it is filled with flaws and untruths. My understanding is "A councillor's primary role is to represent their ward or division and the people who live in it and bridge between the community and the council by representing their views." so how you can ignore the representation of over 5,000 signatures and protests about this application defies belief. I understand that the statutory consultants have found no material issues but these groups do not live or work in the area and will not be affected but the negative impact this facility will bring to the local area. The people living in the area should be the first and only concern as it is we who pay the councils, taxes and want to keep Horsham and its surrounding villages a pleasant place to live. The process seems somewhat undemocratic and unfair if this application is approved.

(i) Visual affect

The applicants imply that they have solved the issue by masking with vegetation. I respectfully ask how this is possible? The building is 35.9m high and the chimney 95m? what kind of vegetation is capable of covering this huge area?

(ii) Noise impact

The noise of the facility working 24/7 is unacceptable to the surrounding neighbours and will diminish quality of life.

(iii) Lighting

In order for the facility to be seen by Gatwick aircraft it will require unacceptable levels of lighting which will cause light pollution in a rural area where there are no streetlights. This will disturb local residents and negatively their quality of life.

(iv) Traffic

The application response finds that traffic will not increase? who will police this once it is in effect? the applicants have been known in the past to make such statements which actually lead to an increase in vehicles. How can the facility practically run with no increase in transport? has this been fully explored?

(v) Pollution

This is one of my main concerns, the chimney has to be 95m tall to for pollution control that in itself is worrying. The facility is for industrial waste which is brought to Horsham for burning it is not local waste. Central Government are running feasibility studies on burning waste and the indications are that current incinerators are not up to capacity so why are we

building another to the detriment of the local area. The energy is NOT renewable unless the counties plan is to burn more and recycle less ?

This facility is in no ones interest except the applicants to generate bottom line, and will hamper attempts on all levels to increase recycling. I also query why WSCC has any incentive to approve this application given the opposition from the communities they are appointed to represent.

I look forward to your reply

Jacqui Birch  
Lower Chickens Farm  
RH12 3RY

Dear Cllr. Dennis & Members of WSCC Planning Committee

Forgive me for making this very blunt, and clear. You will no longer have my long-standing support, nor my vote in future in the event that you support the Incinerator proposals. Born and bred in Horsham, as my wife and I were, we do not wish ourselves, our children and grand-children to be endangered by breathing in invisible toxins from this proposed facility.

Sincerely

Frank & Monica Carpenter

8 Blunts Way

Horsham

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Sincerely

Frank & Monica Carpenter

8 Blunts Way

Horsham

“Greenways”  
27 Gaggewood,  
Mannings Heath,  
Horsham,  
West Sussex  
RH13 6JR

12/05/2018

Dear Editor,

With regards to the proposed new Horsham Incinerator, I am totally at a loss to understand our District Council's stance as reported in the WSCT of 10<sup>th</sup> May 2018 "However despite these concerns it did not believe they were sufficient enough to formally object to the application on material planning grounds." Well to me this seems ridiculous as HDC along with Britannia Crest have just been granted permission to permanently park bin lorries at the Langhurstwood plant by WSCC, which in turn means that HDC have a vested interest and, if so, what a farce this is becoming! Surely the main concerns by all should be the emissions, lorry movements and most importantly the 10,000 new inhabitants to North Horsham of which 50% will eventually be children, along with the new proposed school, private hospital, doctors surgery all coupled to the Kiln Vale and Kilnwood Vale Park developments already being built.

What a completely ludicrous situation this is becoming and, I firmly believe that HDC should object most strongly about any form whatsoever of incineration as it will be detrimental to health and not fair to the thousands of current and future nearby residents.

I plead with all Horsham councillors to think again and, to throw out any plans to do with the archaic system of incineration once and for all, as it is not needed in this beautiful part of Sussex.

Yours sincerely,  
Derek Castle

Dar Mr Quinn

As a resident of Warnham and someone interested in the welfare of all Horsham and West Sussex residents I must ask you to lend your weight to the refusal of the planning permission for the above project on the following grounds:

1. The enormous number of heavy commercial vehicles will be hazardous to other road users and bring emission levels in the area to unacceptable and illegal levels. In this context the Britanniacrest calculations are wildly and widely out and do not pass examination. You should insist on having these recalculated and confirmed by experts.
2. The fumes from the stack will, in most wind conditions, pass over the new North Horsham development at a time when those dwellings are likely to have a large number of children in residence. The contents of the smoke most certainly will not be consistently low in toxins and not only will need daily but maybe hourly testing both close to the stacks and at say 3 miles distance.
3. There is no need for an incinerator as Hampshire's incinerators are already unable to achieve capacity.
4. Incineration will become less and less required as new government regulations regarding the burdening of soft matter including paper are to be redrawn and will exclude such items.
5. My family and I regularly smell the "output" from the current Warnham tip / incinerator which is very distressing
6. The negative aspects of the new Incinerator vastly outweigh the positives - put your Horsham/West Sussex constituents first and let your conscience be your guide when proposing that the planning application be refused once and for all !

I therefore recommend that the permission be REFUSED.

Yours sincerely

Vincent Collingwood  
5 Wyvern Place  
Warnham  
Horsham  
West Sussex  
RH12 3QU

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## Social Diary

By Sally Pavey | If you would like Sally Pavey to attend your social event then please email [wsgazettesocial@gmail.com](mailto:wsgazettesocial@gmail.com)

# Church was full of Horsham residents upset about incinerator plans

**O**ne thing was very clear from those in attendance on Saturday that they were not happy with the local MP, Horsham District Council or West Sussex County Council over the proposed Britaniacrest Incinerator that their officers are seeking to approve.

A large number of residents arrived at St Mark's Church in Holbrook to attend the public meeting concerning the Horsham Wealden Brickworks industrial incinerator and recycling hosted by Campaign to Protect Rural England Sussex branch. CPRE is a charity that seeks to protect with the Queen as patron and 7,073 in the South East as members.

David Johnson, the Chairman of CPRE Sussex was to chair the meeting and he arrived fresh from another event with flags and banners in tow, where CPRE had had a stall informing residents of local planning issues such as the A27 routing and housing as well as neighbourhood plans - they won an award for their work on building better places. He was followed by Director Kia Trainer and trustee Dr Roger Finch.

The panel conformed of Neil Pitcairn, a director of UK WIN, a national environment body that seeks to stop the building of incinerator and have been very much at the heart of national press coverage on the subject and the cross-party political 158 white paper. Being environmentally friendly chaps they shared the ride to Holbrook with co-panelist Surrey Councillor Jonathan Essex of The Green Party who enlightened us to the fact that a council can earn thousands more if they simply separate paper from other waste!

St Mark's Church welcomed in local people with church volunteers and the vicar at the door, making teas and offering cakes the vicar would be seen later working hard in charge of the microphone during question time.

The church was full of residents with displays from UK WIN, No Incinerator 4 Britaniacrest declining to take part in the panel, and Horsham Matters, a church group that helps the local community.

The panel, chaired by David Johnson got underway with West Sussex County Councillor, Peter Catchpole, outlining why he felt that the planning application should be refused, being the wrong place for such a industrial plant as it already has a high level of pollutants with the brickworks, landfill site, the biomechanical digester; the incinerator would simply add to this cocktail of pollution for locals: Neil Pitcairn, a director of the national environmental group UK WIN, detailed how the particulars provided by Britaniacrest on CO<sub>2</sub> and NO<sub>2</sub> pollution were mathematically incorrect and that planning officers should have identified these errors, but instead WSCC officers propose to approve the planning application. He pointed out, like Surrey Councillor Jonathan Essex of The Green Party, that incinerators are to be taxed as it has been shown they reduce the amount of waste being recycled and that we have too many incinerators already for the amount of waste we produce. Neil highlighting that the production of electricity by incinerators goes against Government guidance to local authorities. Leader of Crawley County Council, Cllr Peter Lamb and Labour candidate for the next general elections, highlighted that Crawley already has areas that have high pollution; in fact some residents are meant to refrain from entering their gardens. He raised the issue that due to the wind patterns he objects to the proposed incinerator, as the plume of pollutants would be heading over Crawley adding to the pollution issues his residents already suffer.

Residents voiced their frustration that the local MP Jeremy Quin was absent from the meeting and was not doing more to stop the incinerator. Others showed antipathy that the decision would take place behind closed doors in Chichester and not in Horsham preventing many from attending the planning meeting on 19th June. The community group came to the rescue in organising a bus to take people to Chichester on the 19th so email [n14h.org@gmail.com](mailto:n14h.org@gmail.com) if you would like a ride but first you must apply for a ticket to attend via [Democratic.Services@westsussex.gov.uk](mailto:Democratic.Services@westsussex.gov.uk)

A clear message came from the meeting to the WSCC and HDC councillors that sat in the audience, residents are very opposed to the Britaniacrest Incinerator and expected them to oppose it.



CPRE meeting

Dear WSCC Planning Committee

I am astonished that the Planning Officer is recommending approval of the proposed Horsham Incinerator. As you prepare for next Tuesday's meeting, I appreciate that there is a 44-page Committee report to read and consider. However, for ease of reference please find attached my representation, along with a couple of other significant representations that I have previously copied onto my desktop (I wanted to attach other documents from the WSCC Planning Portal but it isn't working again this evening).

Please see below for an email about the agenda for the Planning Committee meeting.

Kind regards.

Rosemary Couchman  
Horsham Resident

Dear Councillor Crow

wsc/015/18/nh

We would urge you to vote NO to the planning application for this vast incinerator with a 90m+ stack which will be visible from 15kms away; to be built in a largely rural area close to areas of outstanding natural beauty and historic buildings. It is out of proportion to the environment.

Planning officers have failed to ask the applicant for a more comprehensive need assessment

Planning officers have failed to explain the ongoing debate over disposal of waste in the UK. Planning officers have failed to explore the question of overcapacity in the incinerator industry

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This application does not comply with WSCC's own Waste Local Plan as follows Strategic Objective 5,7,8,9, 10 and 13.

All this at a time when the Government's own Chief Scientific Advisor to the Department for Environment, Food and Rural Affairs warned against further investment in Incinerators in the UK whilst speaking at a meeting of Parliament's EFRA Committee on the 31st January THIS YEAR . David Attenborough has written to support the campaign against the incinerator stating that incineration is not sustainable and is the least environmentally friendly option.

Your children and grandchildren deserve better than to be saddled with this greedy incinerator which will work 24/7 polluting our atmosphere, our skies and ruining our countryside. We will become the rubbish bin of the South East with waste being brought in from all over the area - possibly even from abroad. Please listen to the people and not to a few people in the planning department. Think of how you will feel in 10, 15,20, 25, 30 years every time you see that stack. Be proud to VOTE NO.

Thank you

David Dunnington 14 Parkside Mews  
John Farrell 11 Parkside Mews  
Adrienne Evans 6 Parkside Mews  
Shaunna Henning 11 Parkside Mews  
RH12 2sa



Dear Duncan Crow,

I am sure you work hard as a Councillor but when you think of your legacy will you feel proud to have been known as one of the yes votes to the incinerator? When you see the ugly chimney and realise that we have become the dustbin for the South East will you be glad to tell your grandchildren in the decades to come that you voted Yes to this blight on the landscape and on the lives of the people of West Sussex? Evidence is already mounting about over capacity in the incinerator industry so that can hardly be the time to agree to yet more capacity being created.

You have worked hard and been very successful in encouraging the public to recycle. An incinerator will undermine those advances. Burning is not true recycling, it does not allow for the re use of materials. In areas where there are incinerators, recycling rates fall. Why say yes to an incinerator now when there are real moves afoot to reduce the use of plastic? Why agree to support the dirtiest way to produce electricity, going against Government guidance to local authorities over carbon neutral energy production. Advances in packaging, recycling and energy production are speeding up. Why then restrict ourselves and potential job opportunities by tying us into a dirty way of producing energy and ruining our countryside for decades.

Why vote for a measure which will undermine your own great success which future generations will applaud?

Thousands of people have strongly objected to the incinerator. Please listen to us and not to those officers failed to notice that the figures presented by Britanniacrest for CO2 and NO2 are substantially incorrect. The toxic ash will be transported on our roads adding to the cocktail; the site is already not clean site as it has pollutants from the former brickworks, landfill and the biomechanics digester, the incinerator together with cross country movement of waste would be adding to these toxins.

Below are listed some technical aspects which provide sound grounds for rejecting this planning proposal.

This application does not comply with WSCC's own Waste Local Plan as follows:

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

Britanniacrest will be bringing waste from all over the Southern Counties and very likely from far beyond which will cause congestion and pollution. I am aware that they have already been given permission to increase the number of HGV trips but if they don't get permission for the incinerator then they won't need to effect this increase.

Strategic Objective 7: *"To maximise the use of rail and water transport for the movement of waste and to minimise lorry movements and the use of local roads for the movement of waste". (see also Policy W18)*

The applicants intend to rely on HGVs not rail or water transport on what are already very crowded and in some cases dangerous roads because of restricted width and sightlines. The roads are already in a poor state of repair. This situation will deteriorate with increased HGV traffic.

Strategic Objectives 8 and 9: *"To protect and, where possible, enhance the special landscape and townscape character of West Sussex" and "To protect the SDNP and AONBs from unnecessary and inappropriate development"* **(see also Policies W11 and W12)**

With a 96m stack and vast incinerator building how can this be said to enhance the special landscape ..... of West Sussex. If this incinerator goes ahead Horsham and the Council that took the decision will become a laughing stock amongst neighbouring counties. The historic market town will have been blighted, as will neighbouring villages and the close by areas of outstanding natural beauty. Those who vote yes will in the years to come hang their heads in shame when they see the stack from miles away.

Strategic Objective 10: *"To protect and, where possible, enhance the natural and historic environment and resources of the County"*. **(see also Policies W11, W12, W14 and W15)**

HDC can rightly be proud of their outstanding work in founding, supporting and indeed currently expanding the resources at Warnham Nature Reserve. What better way to actively show families/voters that the Council cares about the nature of the world in which their children grow up. It is a shining example to other towns and cities of what can be achieved for wildlife in close proximity to people. In contrast pollution and light from a massive incinerator will disrupt wildlife and adversely affect the many listed buildings and scheduled monuments in close proximity as well as areas of Outstanding Natural Beauty.

Strategic Objective 13: *"To protect and, where possible, enhance the health and amenity of residents, businesses, and visitors"*. **(see also Policy W19)**

At the very least a decision on this incinerator ought to be deferred until Public Health England's results relating to the potentially harmful effects of emissions from incinerators is published. What we can be sure of is that an incinerator will have no beneficial effects for the health/amenity of the people who live in this and neighbouring areas. This application should be considered in conjunction with the already approved application for nearly 3,000 homes including a school which would be very close to the incinerator and the emissions which will flow over these children and their families.

Policy W21: **"Cumulative Impact.** *Proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result....."*

There will be an unreasonable level of disturbance to the environment both due to light pollution every night and the 24/4 noise pollution. The applicant has acknowledged that during operation the background noise levels will be 6db. There is evidence to suggest that anything over 5db has an adverse effect on people.

**Please don't make your legacy turning Horsham and surrounding areas into the dustbin of the South East for decades to come. Vote NO to the incinerator.**

Yours sincerely,

Alison Farrell  
14 Parkside Mews, RH12 2SA

Dear Mr Crow,

I would respectfully ask that you read the following in conjunction with the report prepared by WSCC planning officials with regard to the planning application for a waste incinerator in Horsham.

I would like the planning committee to be aware, that the local opinion is overwhelmingly that this development is not suitable for the locale, despite the planning officials' views on the application. 1189 residents have taken the time to write in to object (an overwhelming 99% of the total received), and a further 4532 petitioning signatures collected. This broadly reflects local views collected, but not evidenced, who felt any efforts on their part to object would not make a difference and hence took no action. The key decision for the committee, we believe is the balance between the **Benefit of this development and technology vs the Local impact. The locals believe the benefits case does not outweigh the local and environmental impact.**

Of most concern is that the developer has submitted an application for a 3Rs facility which is suggestive of "recovery" (80%) in terms of the waste hierarchy, when analysis performed by both UKWIN and local residents with relevant expertise is that this application will be unable to meet the strict criteria for recovery or R1 status under the EU Directive 2008/98/EC and as a result should be treated as a **disposal** application. Disposal waste processing is in line with landfilling activities and therefore right at the bottom of the waste hierarchy. This is the **least desirable and least sustainable/ environmentally friendly option for dealing with West Sussex waste.** It also cannot be stopped once in operation, and so any vote for permission to be granted is in effect a vote for the least desirable form of waste disposal for 25-30 years. This is not something Horsham wishes to support; there is a clear preference that an approach similar to municipal waste is adopted for C&I waste streams to focus on avoidance, re-use and recycling. **The "recovery" vs "disposal" is a key planning consideration which has failed to be addressed by the planning officials. This needs to be addressed before a decision is taken.**

The second point of concern is the need to bring in £230,000 tonnes per annum of waste to Horsham. Although West Sussex report there is an estimated 950,000 tonnes per annum of shortfall in West Sussex for C&I, if you deduct the material which cannot be burned, material that could be recycled, reused, it is estimated this would leave only 89,000 tonnes per annum. By permitting this particular development with a capacity for the equivalent of 2 counties of waste to be burned will not only be in contravention with WSCC Waste Local Plan (which is all about only addressing West Sussex's needs in a sustainable way) but will also encourage cross boundary waste movements from the Southern Counties and further which the applicant has referenced. With this being a purely privately owned and run incinerator, there is no guarantee West Sussex's needs will be met as the driver will be market forces rather than local needs for a sustainable solution to waste processing. Will this lead to over-capacity issues as each county puts similar provisions in place? - if so waste will need to be transported over even further distances as seen in Europe where they are importing in waste from overseas! We should also not assume attitudes and behaviours will not change. The MBT modelling is a good example of that where it was assumed investment was needed for over 300,000 tonnes per annum. Food waste has reduced leading to a reduced need of 60% of

that anticipated. C&I waste is also not monitored and it is widely known that information on capacity is highly likely to be incorrect.

The last point is the insufficient consideration of air quality and the evidence put forward by the applicant. It has been noted that key calculations are wrong and in-particular for Co2 and NO2. The calculations which suggest a lowering of carbon in comparison with landfill is wrong by virtue of their calculations being incorrect by a magnitude of 1000. The correct calculation, based on government guidelines of how to calculate this, suggests this incinerator is worse than landfilling in terms of Carbon Dioxide- a key component of climate change. The longer-term prognosis is that this decision will lead to is an inability for the govt to achieve the reduction of Co2 from the electricity supply in the UK as it seeks to moves to carbon neutral status. The NO2 calculations again are incorrect, and the claims of saving are frankly misleading. The permission being relied on to discount the vehicle impact of the incinerator from 2015, was permitted on out of date data (2013 data) and with little air quality data from the actual site/ area (an air quality monitoring site in Park Way is used which has limited collection capabilities).

Relying on the Environment Agency to “control” after the event rather than confirming the full extent of the area impacted up front is irresponsible and indefensible and is a core part of the planning process to assess upfront. There are parts close to Horsham which have Air Quality problems who will find it unacceptable to permit additional pollutants which could further add to the poor air quality which have not been considered at all- Crawley is one such area.

I would like the Planning Committee to consider in their decision making:

- **Insufficient assessment by the planners of what type of waste processing business this is (recovery vs disposal) and the long- term nature of this decision. The mood music nationally and more globally is that large-scale incineration is not the right answer today let alone in 25 years.**
- **The capacity being proposed is greater than what is needed which will lead to unintended consequences to the local community and surrounding counties as waste is sourced from further afield. This has been acknowledged with respect to the WSCC investment in the MBT. Societal changes/ habits and attitudes to food waste has led to an overcapacity issue- this technology at least can be reduced or switched off as needed. An incinerator cannot.**
- **The air quality has not been adequately assessed in the round and key calculations have been challenged by experts based on the approaches set out by govt. It is clear that the professional consultees and the planning officials are reliant on the Environment Agency to manage rather than upfront knowing that there will not be an air quality impact both in the immediate area of North Horsham but also the surrounding area of Sussex and Surrey.**
- **The locals clearly have strong views on the matter and feel this is the wrong waste processing approach, in the wrong site with the impact being felt by too many. They are looking to WSCC councillors to hear their views and to make the right decision for the local community it serves both for today and the next 3 generations who will be impacted by this development.**
- **There is no doubt that the 95m pluming chimney with plumes up to 350 metres at optimum treatment will be perceived by residents/ visitors as industrialisation of this small market town. If the plumes are not effectively managed, this will be more frequent and longer. There is also no data on night time plumes which will be visible by virtue of the site lighting and permanent chimney safety lights.**

Yours faithfully, and thank you for your attention in this matter.

Kirsty McShane, Local Resident of Horsham

BSC (Hons) Environmental Science

Dear Councillor

May I point out that your planning department has, to date, shared my personal details with all those that have written to the council concerning planning application Planning ref: WSCC/015/18/NH at Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD. This is a serious breach in data protection and we still have not had an email to say if we can attend on the 19th even though we have requested a seat!?

As residents of Warnham parish we would like to strongly object to the proposed incinerator being built and hope that you will reflect a voters views on the 19th June. As a county it is not needed; you will blight Horsham forever with an out of date waste processing plant that will be taxed in the near future as they stop recycling. You would be agreeing to huge cross county movement of waste to feed a private company's profits that will devalue the Horsham area!

The proposals for an incinerator does not meet WSCC waste plan and your WSCC officials, some of which need to go to specsavers, have got things terrible wrong by ignoring key facts:

**Strategic Objective 5:** *to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises.* The scale and throughput of the proposed plant is incompatible with the disposal of local waste and will attract material from outside of the county.

**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 enhance the natural environment.

**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.....*

The proposal will have a dramatic effect on the character of Warnham and so we believe it does not meet the criteria.

**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.*

This incinerator clearly does not meet this requirement.

## **Visual Impact**

The chimney of the brickworks is 26.5m high. The proposed incinerator building will be taller than this chimney some 35.92m in height.

The building will be bigger than Horsham's shopping center, Swan Walk, and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. By the proposers own submission it will be seen as far as Box Hill.

### **Light Pollution**

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 stack will be lit like a Christmas tree producing significant increase in light pollution from the plant and the skyline.

### **Recycle**

Burning waste is short sighted and damaging to the long-term prosperity to the planet on demands for resources.

WSSC taxpayers paid for the Biffa biomechanical digester, and am told by Britaniacrest at their exhibition that this would become redundant due to the incinerator.

### **Noise Pollution**

As the site will be 24/7 it will create noise above the ambient noise enjoyed by rural areas of 30-35dB. This ambient noise levels decrease at night.

### **Flue Stack**

At the Britaniacrest exhibition the organisers detailed that the stack will be similar to a plant in Cornwall. This plant has two larger chimneys and so what is proposed seems to be questionable to its final proportions and subsequently visual impact as it is suggested that the chimney will be far bigger than illustrated by the proposer.

The stack is 95m to take the pollution away but where does it land?

### **Not Needed**

It would seem that West Sussex already has given planning permission for an incinerator at Ford in 2014. With an incinerator already permitted to be built on the coast it is highly questionable why an incinerator is needed on the edge of the county.

Gatwick already has an incinerator, which burns waste from Manor Royal Business Park.

<http://www.bbc.co.uk/news/uk-england-sussex-28486588>

### **Air Quality**

The air quality is declining in the area due to the congestion surrounding our parish. Lack of investment in highways means that we are subjected to cut through traffic on our country lanes every day bring car pollution to our rural doorsteps.



The site sits in a bucket location, lower ground, surrounded by hills which could cause the emissions to remain locally.

Mr and Mrs R F Pavey  
Warnham Lodge Farm  
Warnham  
West Sussex

May i add my voice to Sylvia's argument. It is already projected that longer term this facility will not have sufficient "fuel" from just the local area. So as recycling rates increase and burnable waste "fuel" decreases then in order to operate at the commercial level of the Britanniacrest business case it is likely that "fuel" will need to be brought in from outside of the county. This is contrary to the waste policy of WSCC.

Additionally this shipping in of waste to burn will increase road congestion, increase vehicle emissions and put more HGV vehicles on roads not suitable for the volume. This in turn increases the likelihood of HGVs being involved in accidents with vulnerable road users which are common in this area due to the rural landscape that we love. E.g. cyclists, horse riders, pedestrians.

On no level is this facility warranted or welcomed by the local community. Those of you who rely on our votes to maintain their positions would do well to remember that.

Tim Peters

On 14 Jun 2018, at 11:30, Sylvia Baumgartner wrote:

To Whom It May Concern

I would be grateful if you could ensure the following objections are noted for the Committee, as a resident, I am not sure where, or to whom to provide my objection.

**Firstly** - Why are the numerous rejections of this application being ignored and this application is yet again being presented. It was rejected, the initial concerns have not/and cannot be addressed, yet it has come around again - DOES THIS DIMINISH THIS WHOLE DEMOCRATIC PROCESS, IS IT ABOUT TICKING A BOX TO SAY CONSULTATION WAS UNDERTAKEN, YET JUST GOING AHEAD ANYWAY?

**Secondly** - In terms of the comment below regarding 4.25 - We cannot rely on the Environmental Agency to **control the efficiency of the facility** - they **do not have the power to control, and then lack the resources to investigate and enforce any recommendations they may make**. My evidence for this strong statement is that we asked them to get involved in the drains that keep overflowing on the Wickhurst Green site, as the human waste is overflowing into the stream, and onto the farmland next door - they are unable to compel the developer to do anything, let alone control them. The drains were overflowing just yesterday and has been ongoing for the last 2.5 years.

**Thirdly** - What is West Sussex Council's hidden agenda? Why is it that West Sussex Council seem unable to refuse this application, as has been the case with various other Councils - whilst it may provide jobs, the considerable costs to the tax paying community will be vastly more, over an extremely long period of time. Repairing the roads, controlling the pollution (air, water and ground), downgraded of the area, which leads to considerably more social and legal problems (all of which will cost the council more money).

I look forward to hearing how the Tax Paying Residents of Horsham have been served by the Council, instead of the commercial agenda of the few!

Best wishes

Sylvia Baumgartner

Dear Councillor

Tomorrow you will be deciding whether to grant planning consent to Britaniacrest for the installation of an incinerator in North Horsham.

Although it has been made very clear to the Planning Department that there is a huge public objection to this scheme, they have not been listening. I am not writing to you to present the planning arguments for refusing this scheme, others have done that. All I would ask, is that you properly challenge the Planning Department over the impact this scheme will have on the local area. The visual impact in particular, is of a massive concern. I do not believe that the photomontage imagery provided, truly reflects what those living and travelling through Horsham will see. The image travelling north up the A24 is very cleverly positioned to hugely suppress the impact the proposed monstrosity of a building will have on the area. I would also question whether these images have been properly validated.

My real concern and the reason for me writing to you directly, is the further impact the proposed scheme will have on the residents who live close to the site.

I have lived on Langhurstwood Road for over 10 years, about 300 yards south of the Britaniacrest entrance; an entrance they share with Biffa and Weinerberger. When I first moved in, I was aware that I would have to put up with the landfill site for a few years until the sites scheduled closure. Although not the most pleasant thing to live near, I believed the constant noise of HGV's driving up the country lane and past our properties, and the smells emanating from the site a few times a year, would not be for too long; not so. Since then, West Sussex County Council have seen fit to extend the landfill site planning consent, give consent for a Mechanical and Biological Treatment Plant, allow the doubling in size of the brickworks, the introduction of the Britaniacrest recycling & transfer station, to name a few.

The impact on the lives of those who live close to this site has been horrendous, including:

- the odour problems, which have increased massively from a few times a year, to a few times a month, following the installation of the MBT
- the HGV movements get more and more frequent.
- the vehicles get bigger and bigger, with the vibration running through our homes from 7.00am in the morning, getting worse and worse. To suggest Langhurstwood Road is a suitable road for this type of traffic is nothing short of ridiculous. We have been let down by the Council and in particular, the Highways Department.
- more recently and since Britaniacrest have been operating in conjunction with Biffa, the smells have been unbearable. Recently, we had to suffer 12 days straight of everything in and around our homes stinking of refuse. This now seems to be a constant issue and will only be made worse by granting Britaniacrest planning consent.
- we now have to put up with flies constantly. When everyone else gets a couple of flies in their house, we get a couple of dozen. As I write this email, I am constantly spraying fly killer. I suppose I should be grateful that it masks the smell of refuse.

More recently, we have seen the change in refuse collection policy, with collections now being made fortnightly. The knock on to us, is that a high proportion of the lorries are now carry rotting rubbish which absolutely stinks and hangs in the air every time they go past our houses. Do you get this when you sit in your garden?

We used to joke that it couldn't get any worse, not any more; especially with the arrival of Britaniacrest. This is an aggressive and hostile company that has absolutely no interest in the the local area or the impact they have on their neighbours. There has even been police reports of alleged threatening behaviour against a number of my neighbours. More than any other that has gone before, we dread the granting of this planning consent, as it would undoubtedly make a really bad situation, so much worse. It is nothing less than chinese water torture for those of us with the misfortune of living in Langhurstwood Road and we cannot take much more.

In considering this application, please give some thought to those whose lives are truly affected by your decision.

Please, enough is enough.

Thank you for reading this email.

Wayne Stutchbury

Dear Michael,

For the avoidance of doubt, the update sheet available from <http://www2.westsussex.gov.uk/ds/cttee/plng/plng190618ageupdate.pdf> does not address the completeness of the environmental statement and fails to adequately grapple with the R1 issue. It fails to grapple with the reasons why the Secretary of State imposed an R1 condition at Bilsthorpe and why West Sussex County Council imposed an R1 condition for a previous application. Furthermore, it adopts a legally unsound definition of both R1 and the waste hierarchy itself. The update sheet does not provide an accurate summary of UKWIN's representations despite the fact that UKWIN's submissions cover issues of fundamental importance to the determination of this planning application.

The update sheet states "...in planning terms, there is no reference to waste recovery being limited to facilities meeting a given measure of efficiency". However, this approach is at odds with the National Planning Policy for Waste which make it clear that the waste hierarchy is to be the European waste hierarchy, and to be classed as a recovery operation (R1) as distinct from a disposal operation (D10) under that hierarchy requires the proposal to meet the criteria set by the relevant Competent Authority which is the Environment Agency.

For a proposal to qualify as R1 the EA requires an application providing the details necessary to undertake an R1 calculation. If the result of that R1 calculation is at or above the 0.65 threshold then the proposal is entitled to a Design Stage R1 Certificate. To maintain R1 status a plant must continue to demonstrate R1 compliance.

It is a fact that the Secretary of State determined that a Design Stage R1 Condition was necessary for the Bilsthorpe gasification plant and West Sussex County Council determined that a Design Stage R1 Condition was necessary for the Circular Technology Park. These facts are not reflected in the update sheet.

The update sheet cites the Waste Management Plan for England as defence for treating proposals as R1 irrespective of efficiency, but that document itself states that "Incineration may be classed as recovery or disposal depending on the circumstances. Our Energy from Waste guide provides further analysis of this issue". As per the Industrial Emissions Directive, gasification is a type of waste incineration plant.

As noted in the glossary to the Government's EfW Guide: "'R1' Recovery status – is the definition in the revised Waste Framework Directive for a 'recovery' operation. For municipal waste incinerators this is based on a calculation of a plant's efficiency in converting tonnages of municipal waste to energy. Plants operating at or above the stipulated thresholds can be classified as 'recovery operations' for the purposes of the waste hierarchy. Incinerators operating below the threshold are classed a 'disposal'. There is currently no requirement for municipal waste incinerators to achieve R1 status or have their performance assessed against the R1 formula in the Environmental Permitting Regulations 2010 (EPR). For Non-municipal waste incinerators designation as R1 depends on criteria set by the Competent Authority, this is the Environment Agency in England."

Whilst the EA is the competent authority to grant R1 status, it is the role of the planning authority to require that it actually apply for R1 status, i.e. it is necessary if the facility is to be treated as an 'other recovery' operation in the waste hierarchy. The EA uses the same criteria, i.e. the 0.65 threshold, for mixed waste or RDF/SRF gasification as they do for

municipal waste incineration. As such, the 0.65 threshold is relevant to planning decisions relating to the proposed development.

Furthermore, the National Planning Policy for Waste states that the Waste Hierarchy to be used for planning purpose is the European Waste Hierarchy, and this does not have any step between 'disposal' and 'other recovery'; if a proposal fails to operate as 'other recovery' due to failing to meet the 0.65 threshold then for planning purposes it is 'disposal' at the bottom of the Waste Hierarchy.

It remains necessary for the Planning Committee to be informed of the need for a Design Stage R1 Condition and for the proposal to be determined on the basis that the environmental statement, as it currently stands, is incomplete.

Yours sincerely,  
Shlomo Downen  
UKWIN

On Mon, 18 Jun 2018 at 10:31, Shlomo Downen wrote:  
Dear Mr Elkington,

I write to convey UKWIN's serious concerns regarding the Planning Officer's Report and recommendations in relation to planning application reference WSCC/015/18/NH and the Council's handling of this application. Together, UKWIN believes that these concerns amount to potential grounds for a legal challenge to the Committee decision unless these matters are addressed in full, with a corrected report issued in advance of the Planning Committee meeting. Unless the recommendation is changed to be one for refusal then the issues raised would merit deferral of the consideration of this application by the Committee until such time as these matters have been resolved. As the planning application is due to be considered by the Planning Committee tomorrow, I hope that these concerns will be treated as a matter of urgency.

UKWIN notes the irrational nature of the Planning Officer's suggestion that the proposal does not require consideration as a disposal facility. Given the circumstance, i.e. that it has not been demonstrated that the proposed facility is anything other than a disposal facility at the bottom of the Waste Hierarchy, and in the absence of any planning condition requiring R1 ('recovery') status, it would be irrational to assume that the facility should be treated, for planning purposes, as if it were R1 compliant. The approach taken by the Planning Officer is irrational, and is not supported by a valid explanation; it is inconsistent with West Sussex County Council's November 2013 decision to impose Condition 24 on the permission granted to planning application reference WSCC/096/13/F for Grundon's Circular Technology Park proposal.

West Sussex County Council's R1 Certification Condition for application reference WSCC/096/13/F reads: "24. Prior to the gasification plant being brought into use, the applicant shall submit, to the County Planning Authority, verification that the gasification plant has achieved R1 status from the Environment Agency at Stage 1 (i.e. the design information stage) of the R1 application process" and the reason given for the need to impose such a condition: "To confirm the status of the gasification plant in order to ensure that the

proposal would move waste up the waste hierarchy in accordance with PPS10 and to ensure compliance with Policy W10 of the West Sussex Waste Local Plan".

As has been pointed out repeatedly by both UKWIN and the Environment Agency, the Planning Officer is making a factual error with regard to application reference WSCC/015/18/NH when he says, e.g. at Paragraph 4.25 of the Officer's Report, that: "The Environment Agency would control the efficiency of the facility to ensure that the process qualifies as 'recovery'..."

If left uncorrected then this factual error would result in the Planning Committee being misled.

Paragraph 53 of the Government's Energy from Waste (EfW) Guide explicitly states that: "R1 status...will not be part of an environmental permit." and Paragraph 54 of the Government's EfW Guide states that: "The distinction between having R1 status or having a plant being classified as a disposal facility is important for planning purposes..."

As such, the Government's position is that R1 status is a material planning consideration that cannot be assumed to be ensured by the permitting process, i.e. R1 status should either be required through the planning process or the planning application for the proposed facility should be determined on the basis that the facility would be a disposal operation at the bottom of the Waste Hierarchy. The approach adopted in the Report to the Planning Committee is therefore contrary to Government guidance, and offers no justification for going against Government policy and against the precedent set by West Sussex County Council in the determination of application reference WSCC/096/13/F.

For the avoidance of doubt, I have copied and pasted an e-mail message (below) containing confirmation from the Environment Agency that the Planning Officer is wrong to suggest that, in the absence of an R1 condition imposed by West Sussex County Council, R1 will be required to be addressed by the Environment Agency as part of their permitting process, as follows:

From: **Shlomo Downen**

Date: Fri, 15 Jun 2018 at 17:41

Subject: Re: West Sussex County Council Planning Application - WSCC/015/18/NH - Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure

To: Tracey Guinea

Cc: Jane Moseley

Hello again Tracey,

I have yet to hear back for your colleagues.

In the mean time, I have been in touch with the Environment Agency (EA). As I hope you are aware, the Environment Agency e-mail of 15 June 2018 (below) confirms UKWIN's position, i.e. that Paragraph 4.25 of the Committee Report is incorrect as the EA will not secure R1 through the planning process.

As such, it has been officially and authoritatively confirmed that it would be unsound for the Waste Planning Authority to assume that the proposed facility would constitute an R1



Recovery process in the absence of an appropriate Design Stage R1 Planing Condition, e.g. along the lines imposed by the Secretary of State for the Bilsthorpe Energy Centre (and indeed along the lines previously required by West Sussex for a different EfW proposal).

In light of this, we hope that our previous objections will be re-read in light of the EA's letter, and that in the event of an approval a Design Stage R1 Condition will be imposed.

If the applicant is not willing to agree to such a condition then we expect that the application will be refused, in line with the Inspector's Lock Street refusal, on the basis that it is a D10 disposal facility at the bottom of the waste hierarchy and could be diverting waste from EfW facilities that would be operating as R1 (i.e. the proposed facility would go against the Waste Hierarchy and the planning application would therefore contravene relevant local and national planning policies).

Such clarification needs to be shared with the entire Planning Committee, for the avoidance of doubt and to head off any judicial review of the Committee's decision.

I look forward to confirmation from the Council that they will correct their error and adopt an appropriate and legally sound approach to the consideration and determination of this planning application.

Kind regards,

Shlomo

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**From:** Freeman, Ben

**Sent:** 15 June 2018 16:42

**To:** Jane Moseley

**Cc:** Maskell, Jon ; Hyland, Hannah; Thompson, Matthew; PlanningSSD ; Mears, Jill

**Subject:** Clarification of the Environment Agency's role in the R1 process for waste incinerators - Application No: WSCC/015/18/NH

Hi Jane

I am writing on behalf of the Environment Agency's Solent & South Downs Sustainable Places team (CCd) to clarify the Environment Agency's role in the R1 process for waste incinerators. This in response to the planning officer's report for the proposal for an incinerator at the Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD, Application No: WSCC/015/18/NH – see [here](#).

The report states at Paragraph 4.25 that "*The Environment Agency would control the efficiency of the facility to ensure that the process qualifies as 'recovery' (in accordance with the R1 formula, referred to in representations) and to optimise the amount of electricity available for export outside of the facility.*"

Although we are the competent authority in England for determining R1 applications, we do not require incinerators to have R1 status in order for us to issue an environmental permit, and so the above statement in the planning officer's report will only be correct in the event

that the operator makes a successful application for R1 status (and then maintains R1 status) as described in the process [here](#).

It may of course be that the applicant is intending to make an R1 application and is confident of obtaining and subsequently maintaining R1 status. However, there will be no requirement under the Environmental Permit itself (if issued) for the facility to be R1.

I hope the above clarification is useful, but please do not hesitate to contact me if you have any queries.

Best regards

Ben

**Ben Freeman**

E&B Senior Advisor (Waste Incineration)  
Environment Agency  
Tel. 0203 025 8978

The R1 condition attached by West Sussex County Council to the planning permission granted to application reference WSCC/096/13/F for Grundon's Circular Technology Park proposal, along with several other similar conditions imposed by other Waste Planning Authorities and by the Secretary of State, were brought to the Planning Officer's attention at Paragraph 73 of UKWIN's April 2018 planning objection (attached) which was sent to both Sam Dumbrell and to PL Planning Applications, and for which we received assurance from the Council that, as a representation, "the email will be uploaded to the website within 5 working days, and a copy passed to the relevant planning officer".

I note that the representation does not appear to have been uploaded to the website as promised, and that no explicit reference is made to UKWIN or to our planning objection in the Officer's Report to the Committee. Critically, the Report does not appear to address the significant the issues raised by UKWIN in our April 2018 objection (attached), nor the further concerns raised by Neil Pitcairn in his recent e-mail messages to the Waste Planning Authority.

I have undertaken a close reading of the Committee Report and it appears not to address the errors and omissions in Appendix 2.3 of the Applicant's Climate Change statement identified in UKWIN's objection of April 2018.

As it is a legal requirement that EIA developments can only be approved if the Environmental Statement is complete this means that if planning permission is granted without these issues having been resolved then the decision will be open to judicial review on this basis. The decision would be especially vulnerable in this case as the concerns have not been addressed within the Committee Report.

If West Sussex County Council is unable to provide an adequate explanation for why the applicant has not been required to provide a complete Environmental Statement and why these important concerns have not been discussed within the Officer's Report as a matter of urgency then the most legally prudent approach would be to defer the consideration of this application until after these problems have been addressed.

At the very least, the Planning Committee should be made aware of the various errors and omissions identified by UKWIN and informed that these have yet to be resolved, and for the Planning Committee to be reminded that they have the right to either refuse planning permission on the basis of an incomplete environmental statement or defer consideration of the application pending the response to a request for the applicant to provide further environmental information to address UKWIN's concerns.

The Planning Committee should also be informed of the significance of the R1 issue to the determination of this application and of their ability to impose a suitably-worded R1 Certification Condition along the lines of Condition 24 imposed by West Sussex County Council's November 2013 decision in relation to application reference WSCC/096/13/F for Grundon's Circular Technology Park proposal (albeit updated to reflect the replacement of PPS10). If the applicant were to resist the inclusion of such a condition then the Committee should be informed that it has the right to follow the example of the Lock Street decision (PINS Ref 2224529) where the Planning Inspector refused the planning application due to the proposal's contravention of the waste hierarchy.

Whilst UKWIN's April 2018 objection (attached) and supplementary submissions should be read in full, I note in particular the following excerpts from our objection:

23. The analysis contained within Appendix 2.3 fails to adequately set out all of the assumptions and methodologies applied and all of the underlying data and associated justifications for using those assumptions and methodologies.

24. Furthermore, some of the statements made within Appendix 2.3 appear to be contradictory, confused, and/or simply out-of-date.

25. If some of the omissions in the assessment are corrected then it appears that the development would have a significant adverse GHG impact, and therefore either additional information should be sought from the applicant or the application should be determined on the basis that climate change benefits have not been demonstrated and significant adverse change impacts have not been ruled out.

26. In relation to errors, it appears that the applicant and their consultants made a simple 'unit of measurement error' that results in an overstatement of emissions avoided through reduced transport by a factor of one thousand, i.e. the applicant's figure of 110,315 kilograms per annum was erroneously treated as if it were 110,315 tonnes per annum...

30. As per DECC's source spreadsheet, the standard set conversion factor cited is 0.70kgCO<sub>2</sub>e/km (equating to only 0.0007tCO<sub>2</sub>e/km), but the applicant appears to be working on the basis that the factor is expressed in tonnes (0.70tCO<sub>2</sub>e/km), which is one thousand times higher than DEC's actual figure.

31. This means that the result of applicant's calculation of 157,140km x 0.70 is actually 110,315 kilograms of CO<sub>2</sub> avoided per annum, i.e. only 110 tonnes of CO<sub>2</sub> per annum. However, Table 3 of the 2016 Carbon Assessment uses the 110,315 kilogram figure as if it were 110,315 tonnes rather than 110 tonnes.

32. Over the expected lifetime of the plant this mistake with transport emissions adds up to overstating avoided emissions by **more than 2.75 million tonnes of CO<sub>2</sub>** ((110,135 - 110) x 25).

43. In addition to the errors set out above, and in addition to inconsistencies in relation to both efficiency and uncertainties regarding composition highlighted above, we would like to draw attention to two further significant problems with the applicant's 2016 carbon assessment, as follows:

- a. The incorrect marginal emissions factor (MEF) is used; and
- b. The biogenic carbon sequestration benefits of landfill are not accounted for.

61. Therefore, based on a partially corrected version of the applicant's own estimated emissions scenario, sending the waste to the proposed incineration facility would be **16,479 tCO<sub>2</sub>e per annum worse** than sending that same waste directly to landfill.

62. Other problems that we have observed in relation to the applicant's 2016 carbon assessment include:

- a. the transport assumptions (which appear to overstate the benefits of incineration, and which do not take account of diesel vehicles being replaced with electric vehicles during the lifetime of the proposed facility); and
- b. the landfill gas engine efficiency (which appear to overstate the benefits of incineration).

63. As should be clear from the issues raised above, the conclusions of the applicant's 2016 carbon assessment cannot be relied upon to provide an accurate description of the likely environmental impacts of the proposal.

64. Problems inevitably arise from the applicant's fundamental failure to correctly follow an accepted methodology applying a set of justified assumptions. We hope that these problems will be resolved as part of any revised climate change assessment required of the applicant by the WPA.

65. Alternatively, we would expect the WPA to determine the application on the basis that the proposal would contravene the strategic objective to minimise carbon emissions, and would therefore go against Waste Local Plan SO 14 as well as other local and national plans and policies in relation to carbon emissions and climate change.

75. UKWIN notes that Table 7.8: Mass Emissions from the applicant's Environmental Statement (ES) Volume 1, Chapter 7 on Air Quality and Odour appears to omit figures for total organic carbon (TOC) despite the fact that emissions are limited by the Industrial Emissions Directive (IED) and despite the fact that the applicant themselves include benzene as a main air pollutant (e.g. at Paragraph 7.2.18).

76. UKWIN urges the WPA to ask the applicant to provide TOC data, expressed as benzene (i.e. assuming all TOC is benzene), in accordance with standard practice and with IED requirements and with the relevant requirements of Environmental Impact Assessment legislation.

As can be seen for the extracts set out above, the Planning Officer's Report is seriously deficient, and falls well short of addressing the issues raised by UKWIN. The Officer's Report as it stands does not provide a sound basis for the lawful determination of this

application. Furthermore, the Environmental Statement as it stands is not complete and so the planning application could not lawfully be approved prior to further environmental information being provided.

Thank you for your considerations of the matters raised. I would appreciate being provided with an acknowledgement of receipt and an assurance that these matters will be appropriately remedied in advance of any determination of the planning application, whether that determination takes place this week or in the more distance future.

Yours sincerely,

Shlomo Downen

on behalf of the United Kingdom Without Incineration Network (UKWIN)

From: Roger Purcell  
Sent: 19 December 2018 18:03  
To: Jane Moseley  
Cc: Parish Clerk (Warnham)  
Subject: Fw: Horsham 3R planning application

Dear Jane,

You may recall the correspondence we had on the North Horsham 3R application earlier in the year. I have two points which have not been explored i.e.

1. The slenderness of the chimney. I question whether it is feasible to construct a structure so slim and 90m high. I have an emailed comment to this effect on the application website.
2. The potential power generation of the plant has, I believe, been grossly exaggerated - see below.

Kind regards,  
Roger Purcell

-----Original Message-----

From: Jane Moseley  
Sent: Wednesday, July 11, 2018 10:07 AM  
To: Roger Purcell  
Subject: RE: Horsham 3R planning application

Mr Purcell

Thank you for your email. This may be a consideration, as you say, if the application goes to appeal. At this stage I can offer no more insight.

Kind regards  
Jane.

Jane Moseley  
County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex  
County Council, Ground Floor, Northleigh, County Hall, Chichester PO19 1RH  
Phone: 0330 22 26948  
Email: [jane.moseley@westsussex.gov.uk](mailto:jane.moseley@westsussex.gov.uk) | Web: [www.westsussex.gov.uk](http://www.westsussex.gov.uk)

-----Original Message-----

From: Roger Purcell  
Sent: 04 July 2018 18:18  
To: Jane Moseley  
Subject: Horsham 3R planning application

Dear Jane,

I followed the planning committee's procedures and have read the minutes. I have always suspected Britaniacrest's power generation figures. In the minutes it is reported that the plant will generate sufficient power for 43,000 homes - 77% Horsham district, as pretty well, a bi-product of re-cycling. The Swansea Bay Tidal Power at a cost of £1.3 billion claims to be able to power 155,000 homes. If Britaniacrest can power 28% of this and re-cycle waste at a small percentage of £1.3b it must be a very clever process. My own calculations suggest it could power 50 houses but I stand to be corrected on this.

It will only matter if the application goes to appeal but if you have any more insight into this I would be very grateful.

Kind regards,  
Roger Purcell  
Warnham Parish Council