For official use only (date received): 03/03/2019 19:31:02

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE					
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	DR. GODELA ABREU				
Address	5 Wheatsheaf Close HORSHAM RH12 5TH				
ABOUT YOUR COMME	NTS				
In what capacity do you	wish to make representations on this case?				
☐ Appellant					
☐ Agent ☑ Interested Party / Per	rson				
☐ Land Owner					
□ Rule 6 (6)					
What kind of represental	tion are you making?				
☐ Final Comments					
☐ Proof of Evidence ☐ Statement					
☐ Statement of Common Ground					
☑ Interested Party/Person Correspondence					
☐ Other					

# YOUR COMMENTS ON THE CASE

I consider that there are already a considerable number of developments around Horsham and if this incinerator is build there will be a considerable adverse impact on the road capacity. It will also impact the air quality adversely and thus the public health.

For official use only (date received): 04/03/2019 16:09:37

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE					
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	MR FARUQ AHMED				
Address	15 Chesworth Gardens HORSHAM RH13 5AR				
ABOUT YOUR COMME	NTS				
In what capacity do you	wish to make representations on this case?				
<ul> <li>□ Appellant</li> <li>□ Agent</li> <li>☑ Interested Party / Per</li> <li>□ Land Owner</li> <li>□ Rule 6 (6)</li> </ul>	rson				
What kind of representation are you making?					
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>					

# YOUR COMMENTS ON THE CASE

The site is too close to Gatwick Airport which suffers from "inversions", thus is often fog bound. We in the surrounding area of Gatwick Airport suffer from air pollution already; and, an incinerator like the one proposed in Horsham will add to our health problems. Some 15 years ago a similar incinerator was proposed in Copthorne, and this proposal was withdrawn for the reasons I have stated. At that time residents of Copthorne pointed out that it will be better to have such incinerator(s) built on the coast between Brighton and Worthing thus allowing the discharge from the incinerator to blow towards the sea - the health to the immediate population will not be effected.

From: DIVER, Alison

**Sent:** 04 March 2019 13:24

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Regarding the incinerator APP/P3800/W/18/3218965

**Importance:** High

Hello Helen,

Im not sure how you have justified objecting to the build based solely on the visual impact. There are many health concerns to bear in mind too. Not just air quality from increased traffic (the lorries, that's a fact no getting around that one as the lorries will be transporting the waste for incineration into the area), but also vibrations from the incinerator being operational 24hrs a day, and the effects that the local community will experience every time the incinerator is cleaned. In other areas where an incinerator exists, during cleaning times (not always scheduled due to health and safety) a huge cloud of dust and rubbish particles covers the local area, this includes parks, gardens, school playgrounds, cars etc...

Therefore I strongly urge you to consider the whole impact of the life of the incinerator on the current and future residents of the area.

The area has already declined in the most wanted to live in areas, don't make it decline further.

Oppose the incinerator build, as WSCC had previously done. Don't overturn an already made NO decision.

Alison Diver

Alison Diver

**Sent:** 03 March 2019 21:27

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** APP/P3800/W/18/3218965 incinerator

I object to the incinerator on many grounds. If you need so of my objections here are a few: Visual / health / traffic.

86 littlehaven lane horsham rh12 4jb
Alison Diver

From: ALISON INGRAM
Sent: 02 March 2019 08:34

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965

### Dear Ms Skinner

Re: Incinerator Appeal at the former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex County Council's planning register (reference WSCC/015/18/NH) Appeal Reference APP/P3800/W/18/3218965

# We would like to strongly object to the proposed incinerator by Britaniacrest for the following reasons:

# **Visual Impact**

The proposed incinerator building will be much taller than the existing chimney some 35.92m in height and taller than the brickworks chimney, 26.5m.

It will be seen from far and wide, including areas of outstanding natural beauty. It will across the road from Warnham Nature Reserve! How can anyone enjoy the nature reserve with an enormous chimney in the background, it completely spoils the ambiance and tranquility! It will also be far too close to Warnham Deer Park with its world class herd of red deer.

The site is too small for what is proposed and the landscape planting will not hide the monstrous chimney.

# **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. It will create light pollution for neighbouring villages and rural communities!

# 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.

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.

# **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.

We do not feel that an incinerator is appropriate at this site, it will completely ruin our rural community for the reasons stated above. We are most concerned about the visual impact, light pollution, air pollution and noise pollution and a huge increase in traffic. We are appalled that this site is even being considered given it's in an area of outstanding natural beauty!

Yours sincerely

Alison Ingram and Michael Short

2 Bailing Hill Farm Cottages, Goose Green, Warnham RH12 3RS.

Ms Helen Skinner
The Planning Inspectorate
Room 3/J Temple Quay House
2 The Square
Bristol
BS1 6PN

Email: helen.skinner@pins.gsi.gov.uk

Planning appeal reference: APP/P3800/W/18/3218965

Site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

Date: 10 February 2019

Name: Mrs Alison Kirke

Address: 3 Fivens Place, Horsham, West Sussex RH12 5AS

Dear Ms Skinner,

Please do not allow this application for an incinerator to be granted. The proposed site is much too close to housing and will cause pollution from fumes, constant heavy traffic and noise/lights.

Why should Horsham residents have to put up with all this so that other areas of the country can get their rubbish incinerated while local people suffer, just to make money for a private company?

This proposal also does not make any sense in view of the need for us to recycle more!

Please turn down this application.

From: alison rutherford

Sent: 17 January 2019 16:14

**To:** Skinner, Helen

**Subject:** Re: Please do not grant this hideous application appeal!!

The Old Brickworks, Langhurst Wood Road.

On Thu, 17 Jan 2019 at 16:13, Skinner, Helen < Helen. Skinner@pins.gsi.gov.uk > wrote:

Dear Alison,

Please supply the details of the appeal you are referring to.

Kind Regards

Helen

Helen Skinner

The Planning Inspectorate

Major Casework

3/J Kite Wing

Temple Quay House

2 The Square

**Temple Quay** 

Bristol

BS1 6PN

0303 444 5531

From: alison rutherford Sent: 17 January 2019 16:12

To: Skinner, Helen Subject: Please do not grant this hideous application appeal!!
Definitely against this application!

From: Ali

**Sent:** 22 February 2019 12:54

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning appeal APP/P3800/W/18/3218965)

I am writing to oppose the appeal by Britainiacrest Recycling Limited. The proposed incinerator would be devastating to local residents due to its size, proximity to housing and pollution both physical and noise. Mrs Alison Weedon

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☐ Rule 6 (6)

□ Statement

☐ Other

☐ Final Comments □ Proof of Evidence

What kind of representation are you making?

☑ Interested Party/Person Correspondence

☐ Statement of Common Ground

# The Planning Inspectorate

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Appeal By	BRITANIACREST RECYCLING LTD					
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349					
SENDER DETAILS						
Name	MR VINCENT ALLUM					
Address	17 Steeres Hill Rusper HORSHAM RH12 4PT					
ABOUT YOUR COM	MENTS					
In what capacity do y	ou wish to make representations on this case?					
☐ Appellant						
☐ Agent	Dorson					
<ul><li>✓ Interested Party /</li><li>☐ Land Owner</li></ul>	reison					

# YOUR COMMENTS ON THE CASE

I object to this application because the development will have an unacceptable impact on the landscape in this rural area and will bring a large number of heavy vehicles onto the roads that will impact safety.

From: Amanda king

**Sent:** 22 February 2019 07:14

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Incinerator appeal

Dear Ms Skinner

We do not need and should not allow the Incinerator to be built on the proposed Horsham site. There is a proposed Incinerator to be built in Ford and West Sussex does not need another site.

The chimney would spoil the natural beauty of our area not to mention the continual noise and light pollution it will cause. It cannot be allowed to go ahead. The site is too small and the impact on our community would be massive. The infrastructure cannot deal with much more development of any type as we are all ready rammed with numerous huge housing developments and very busy roads especially the already dangerous A24. It cannot be allowed to go ahead.

Yours sincerely

Amanda King

From: Andrew Briant

**Sent:** 28 February 2019 09:03

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965 - Britaniacrest Recyling - Warnham

West Sussex

**Importance:** High

Dear Ms Skinner

With regard to the above appeal.

I am writing to express my deep concern over this planning application.

The location is a rural part of West Sussex - and Britaniacrest propose to build the largest flue stack in the county - higher than the current high point at Leigh Hill in Surrey. They have not given any detailed information on the design - and there is therefore major concern that there is a risk to human health.

You only have to consider that the reason for making it so tall is to try and get the particulates high enough into the atmosphere to be dispersed - however wind conditions and the like will typically prevent this. Just review fog levels at Gatwick to see this in action. There are a large number of families and schools - so all now at risk.

I have seen public letters from Britaniacrest saying that there will be no impact to traffic or noise pollution. This is, at best, not 100% accurate at worst highly misleading if not a downright falsehood - as they also propose that the plant is going to operate 24/7 with an enormous increase in the amount of waste being incinerated. This will of course have the obvious effect of a large number of additional lorries coming into the area - travelling on insufficient road infrastructure. There is also going to be major local impact on them operating during the night with heavy lorries constantly coming in and out.

any person or corporate body that would come to a court of law - with "unclean" hands - in that they are not being honest - automatically loses their rights as set out under English law.

This is going to be an enormous, highly visible, dangerous plant in the middle of rural England. it is, in my opinion, poorly thought through and their appeal should be overturned.

Yours sincerely

**Andrew Briant** 

Old Charmans, Broadbridge Heath. W.Sussex. RH12 3PS

From: Andrew Charlton
Sent: 04 March 2019 21:23

**To:** Helen.skinner@pins.gsi.gov.uk

**Subject:** Incinerator Objection

Please note our objection to the erection of the incinerator in Horsham, reference: APP/P3800/W/18/3218965

# **Andrew Charlton**

Authorised representative of Consort Technical Underwriting Managers (Pty) Ltd

From: Eggs, Andrew

**Sent:** 26 February 2019 12:13 **To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning Appeal APP/P3800/W/18/3218965 - Former Wealden Brickworks

Dear Helen,

Ref Site Address: Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12

4QD

Description: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure

Application reference: WSCC/015/18/NH

Appeal reference: APP/P3800/W/18/3218965

Please accept this email as my further comment in objecting to the proposed incinerator near Horsham, West Sussex on the following two key grounds:

- 1. There is no need for this facility in West Sussex the construction will be contrary to Strategic Objective 5, for transfer, recycling and treatment facilities to be as close as possible to where waste arises, as the scale indicates a far wider area beyond will be sought, especially as increased recycling across our communities will mean a reduced supply of local waste to fuel the incinerator. There is already a well-documented surplus incinerator capacity in mainland Northern Europe, with potential decommissioning of incinerators. Planning permission was granted for an incinerator in Ford West Sussex in 2014, so this will cater for West Sussex needs, there is no need for another incinerator in Horsham.
- 2. The negative impact on the landscape and visual amenity of the surrounding area the proposal is contrary to Policies W12 and W13 of the West Sussex Waste Local Plan 2014. The chimney and the proposed incinerator building will be seen from miles away, impacting areas of outstanding natural beauty. Also, the CAA has demanded the middle and top of the stack be lit at night due to flight routes, so light pollution will be significantly increased.

Based on the above two key points of objection, I would ask that the Planning Inspectorate rejects this appeal.

Yours sincerely

Mr Andrew Eggs 1, Pryors Wood Kingsfold West Sussex RH12 3SZ From: Andrew Vaughan
Sent: 23 February 2019 23:30

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

Dear Hellen,

I have tried to make comment online but have been 'rate limited' and thus denied access to the site. I trust that this email is sufficient to register my absolute support for the new incinerator.

I would appreciate acknowledgement of receipt of this email.

Kind regards Andrew Vaughan 4, St Leonards Park House RH13 6EG From: Andrew Harvey

Sent: 03 March 2019 11:32

To: PL Planning Applications

**Subject:** Re: WSCC/015/18/NH Extended Deadline for Submissions & New Weblink:

Planning Appeal APP/P3800/W/18/3218965 - Former Wealden Brickworks)

Dear Madam,

I have attempted to place a comment by the planning website today however it seems to suggest it is no longer open to comment.

Please pass this email on to the appeals committee.

My family and i as local residents note the fact that the council has decided to not contest numerous concerns raised. We disagree with this decision. In particular the suggestion that an incinerator will pose no risk to health. There is considerable scientific debate on this matter and unless the organisation behind the incinerator is willing to promise 100% they will have no impact on health and fund all necessary health costs associated with any future illnesses that could be as a result of the incinerator they should not be permitted to build near family homes. It is quoted that the standard government authorities have been consulted however there is simply not enough scientific evidence to rule out health problems in the future.

Regarding no increased traffic- this seems unlikely if the company is to become truly profitable at the site. They will need to increase significantly the volume of waste they dispose of and for this the amount of traffic will have to increase significantly beyond what they quote. Their assessment of the viability of their project also appears out of date and needs to be considered in a post Brexit business environment.

The constructor is providing a deliberately conservative estimate of its impact on the area- in terms of traffic pollution and environment.

The impact on the price of family homes should also be taken into account. Families bought their homes with the expectation that families would be carefully considered in all planning applications in the area. Any impact on local house prices should also allow for compensation from the constructor to be expected should this arise or from the approving council should this not be possible through the courts.

We strongly object and recommend the appeal should be rejected immediately. The children of Horsham and any other town should be protected from such unnecessary risk.

Kind Regards

Andy, Victoria, Jasmine, Lily & Mia

13 Edwards Close

From:

**Sent:** 03 March 2019 18:07

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Horsham Incinerator Planning Appeal Reference APP/P3800/W/18/3218965.

# To the Planning Inspector:

Last year I made a representation to object to the original application by Britaniacrest for an incinerator in Horsham. I am now again writing to restate my object to the planning application appeal from Britaniacrest for the same incinerator.

I understand that you will receive the past representations made by members of the public so that I do not have to repeat mine here. However I now want to state my support for the reasons that the WSCC refused the planning applications in 2018 which were as follows:

- 1. It has not been demonstrated that the facility is needed to maintain net self-sufficiency to manage the transfer, recycling and treatment of waste generated within West Sussex. Therefore, the development is contrary to strategic objective 3 of the West Sussex Waste Local Plan 2014.
- 2. The development would have an unacceptable impact on landscape and the visual amenity of the area, contrary to policies W12 and W13 of the West Sussex Waste Local Plan 2014.
- 3. The development would have an unacceptable impact on highway capacity, contrary to Policies W10 and W18 of the West Sussex Waste Local Plan 2014.
- 4. The development would have an unacceptable impact on residential amenity, contrary to Policies W10 and W19 of the West Sussex Waste Local Plan 2014.
- 5. The development would have an unacceptable impact on public health, contrary to Policy W19 of the West Sussex Waste Local Plan 2014.
- 6. The development, along with other existing, allocated and permitted development, including the North of Horsham development, would result in adverse cumulative impacts, contrary to W10 and W21 of the West Sussex Waste Local Plan 2014.

The size of the construction is excessively large and high and will have a major impact on Horsham and surrounding villages as well as AONB.

A large and unsightly incinerator will not enhance the local area but blight this area and be visible from kilometres away in areas of Area of outstanding Natural Beauty. There are also unanswered questions about the pollution resulting from emissions, (including lead, mercury, dioxins) the increase in road traffic and impact it will have on business travel due to congestion and detrimental impact on Horsham as a whole as a pleasant place to live.

With the current push for greater recycling and for reducing the use of plastics especially for packaging the availability of suitable waste to feed the incinerator will be impacted. The emphasis should be on recycling, reuse, composting etc. rather than burning. The public mood is not for supporting incineration but for the reduction of pollution especially of air. I think that even if the incinerator is built its life may be shortened by the changing politics in this regard.

For these reasons and the others outlined above I object to the Britaniacrest incinerator appeal. Regards,

Angela Meredith 13 Earles Meadow, Horsham RH12 4HP From: Anna Lancaster
Sent: 02 March 2019 15:04

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Ref APP/P3800/W/18/3218965

I am adding support against the incinerator.

I am concerned about the impact on the landscape and visual amenities of the area. We moved here as a family 12 years ago, choosing this area for its amenities, proximity to London and the coast and also it's countryside and beauty.

We live very close to the proposed site and I believe this will have a detrimental affect on the countryside and what Horsham has to offer. The chimney will be a major eye sore to everyone coming from London. I have concerns as it will work 24hrs a day and also the harmful pollutants it will output.

How will this sit also with the north horsham development site and selling new houses etc. What an eye sore for prospective new owners. They will be our neighbours and neither they nor us existing residents want this in our doorstep.

We hope you will reconsider this. Yours sincerely. Mrs Anna Lancaster. From: Annamarie

**Sent:** 04 March 2019 22:52

**To:** helen.skinner@pins.gsi.gov.uk

Subject: Reference APP/P3800/W/18/3218965

In reference to planning application - Reference APP/P3800/W/18/3218965

To whom it may concern,

I'd like it noted that I oppose this application and appeal. I can't quite believe that an application that has already been turned down, can be appealed and considered yet again!

I am opposed to the application for many reasons, and am surprised and feeling let down that the Council are only defending 1 of the points on which it was previously refused! All the refusal points are valid in my opinion, and all deserve defending to protect Horsham - the town I live in with my young family and am proud to call home.

The main issue that I feel has to be given significant importance is around the fact that incineration reduces recycling. Anything that undermines recycling at a time when Nationally and Internationally there is a huge shift in how we use, package, and recycle - moving towards greener alternatives - is going to have a catastrophic impact on the environment, and contribute on a wider scale to global warming...not forgetting also the significant negative effects on health as a result of the toxic by products and emissions created by incineration.

I was also shocked to learn that the Councils Waste plans that it refers to in relation to assessing / arguing the need for such a facility, was written in 2006...so they are using information that is more than 13 years out of date - as the info gathered and written into that plan was collated prior to 2006! The current waste capacity is significantly reduced, given the change in behaviour relating to waste as indicated previously around reducing and recycling waste. Countries which have historically been very pro incineration and burning waste for many years, have in recent years done a u-turn and are putting a stop to incineration. We need to learn from what has been done by others before - not create the same mistakes!

I'm incredibly disappointed that this application has been resubmitted following its rejection, I feel it makes a mockery of the application process and really hope that it will be dismissed again - as it is purely a commercial venture motivated by profit, and not to do the right thing for either the people of Horsham or the Environment on a wider scale.

I trust my thoughts will be considered.

With regards

**Annamarie Stepney** 

From: anne davies

**Sent:** 28 February 2019 15:00 **To:** PL Planning Applications

Subject: Planning Appeal APP/P3800/W/18/3218965 - Former Wealden Brickworks

### Dear Sir/Madam

Having considered this application and planning appeal carefully I do not support it and as such am writing to object for the following reasons.

- whilst appreciating the Great British public generate a lot of waste and are difficult to
  educate on the three Rs, however Britania Crest are not intending this site to be used for
  the benfit of the county, it is purely for the profit of a PLC business with no connection to
  the community
- incineration only encourages business who are the main producers of waste to produce more, businesses need to be educated and incentivised to reduce waste, this facility nor Britania Crest will not do that
- the builing is too large and obtrusive for the location
- the lorry traffic in the area will be far in excess of what the roads and locality can cope with and there is investment by Britaniacrest to resove this
- the lorrry traffic will add to the polution in the area which is damaging to local health and wildlife
- this chimney is too high and will dominate the locality which has now recovered from the eyesore of the landfil and back to Sussex hillside
- the emissions from the chimney will polute the locality
- the World Health Organisation advises such a facilty should not be located in a populated area

Your sincerely

**Anne Davies** 

Warnham resident

From:

**Sent:** 04 March 2019 20:34

**To:** Helen.skinner@pins.gsi.gov.uk **Subject:** Ref: APP/P3800/W/18/3218965

Dear Ms Skinner,

I would like to state my objection to the incinerator being built in Horsham. I no longer live in West Sussex however spent my childhood growing up there and have many friends who now have families who will be affected by this pollution. We formally object to the building of such a device and believe that green alternatives should be considered instead, with great urgency.

Sincerely

Anne Roberts 135 Castle Road Salisbury Sp1 3rr Ms Helen Skinner
The Planning Inspectorate
Room 3/J Temple Quay House
2 The Square
Bristol
BS1 6PN

Email: helen.skinner@pins.gsi.gov.uk

Planning appeal reference: APP/P3800/W/18/3218965

Site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

Date: 22/2/19

Name:Mrs Ann Wynniatt-Husey

Address: Faygate House, Wimlands Lane Faygate West Sussex RH12 4SP

Dear Ms Skinner,

I would like to register my objection to the building of this incinerator.

- 1.Surely there is no need for one in the first place as I understand it there is enough capacity in place already
- 2. To leave our property to the south we have to brave the A264 quite daunting enough without the addition of extra lorries (the new housing development is already adding a fair number of cars)
- 3. I want my grandchildren to grow up in a green environment.

Yours faithfully

Ann Wynniatt-Husey

For official use only (date received): 04/03/2019 10:04:29

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE					
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	MRS REBECCA ATKINSON				
Address	35 Smithbarn HORSHAM RH13 6DS				
ABOUT YOUR COMME	NTS				
In what capacity do you	wish to make representations on this case?				
☐ Appellant☐ Agent					
✓ Interested Party / Person  □ Land Owner					
□ Rule 6 (6)					
What kind of representation are you making?					
☐ Final Comments ☐ Proof of Evidence					
□ Statement					
☐ Statement of Common Ground  ☑ Interested Party/Person Correspondence					
☐ Other	•				

# YOUR COMMENTS ON THE CASE

This application should be refused - the development would have an unacceptable impact on neighbouring schools, houses and amenities. The area around this proposed development is due to be used for hundreds of new homes, a large primary/secondary school and other community amenities. The environmental impact of this new incinerator will be significant - the facility is not needed and should not be allowed so close to residential areas.

For official use only (date received): 08/02/2019 15:17:26

Warnham HORSHAM RH12 3SR

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

-					
DETAILS OF THE CAS	SE SE				
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	MR KEVIN BACON				
Address	16 Station Road				

# ABOUT YOUR COMMENTS In what capacity do you wish to make representations on this case? Appellant Agent Interested Party / Person Land Owner Rule 6 (6) What kind of representation are you making? Final Comments Proof of Evidence Statement Statement of Common Ground Interested Party/Person Correspondence Other

# YOUR COMMENTS ON THE CASE

As a resident of Warnham parish I would like to urge The Planning inspectorate to reject the appeal lodge by Britanniacrest on the following grounds.

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 my legacy be?

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

# **Jane Moseley**

From: Victoria Bacon

Sent: 11 February 2019 14:35

To: helen.skinner@pins.gsi.gov.uk

Subject: Objection letter planning ref 3218965 - Wealden Brickworks

Attachments: Planning Inspector ref3218965 Former Wealden Brickworks RH12 4QD copy.pdf

Dear Ms Skinner,

Please find attached an objection letter planning ref 3218965 - Wealden Brickworks

This email has been scanned by the Symantec Email Security.cloud service. For more information please visit <a href="http://www.symanteccloud.com">http://www.symanteccloud.com</a>

Ms Helen Skinner
The Planning Inspectorate
Room 3/J Temple Quay House
2 The Square
Bristol
BS1 6PN

Email: helen.skinner@pins.gsi.gov.uk

Planning appeal reference: APP/P3800/W/18/3218965

Site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

February 10th, 2019

Victoria Bacon

16 Station Road Warnham West Sussex RH12 3SR

Dear Ms Skinner,

I am writing to object to the proposed building of the incinerator at the Wealden Brickworks reference: APP/P3800/W/18/3218965.

I live directly in front of the proposed development site and will be directly impacted by it. Having had to fight the planning application on two previous occasions both times with the application being turned down and dismissed successfully, it is with much frustration that the application has gone to appeal and that your department are once again considering this unwarranted and ill conceived application.

I continue to object on the grounds stated in the first two applications in his case and further object for the following reasons:

- 1. I am outraged that I have to out of my own personal funds raise enough money to employ a Barrister and Technical Experts that can appear at the inquiry and cross-examine other parties. Without them Britainnia Crest might be able to get permission they require because they can pay for it. In essence their motivation for building the incinerator is purely financial. They have no reason to think ahead and consider the long term impact of building such a facility. They will not be accountable when there is insufficient rubbish to incinerate. They'll have their money and be able to walk away. As a tax payer I believe my money should be spent more appropriately. The current elected representatives in the County have not sought or illicit the views of those constituents directly involved and are acting against the wishes of the residents. As proven and upheld twice before. Further, that this matter is decided by 'officials' who have no connection to or awareness of the area that will be irreversibly affected if this facility were allowed to be constructed.
- 2. The facility is not a sustainable or a desirable long term option for the County. Incinerator overcapacity being my major concern. Early Day Motion 581, which calls for a moratorium on new waste incineration capacity, was signed by 19 MPs including at least one member of every political party active in Westminster.
- 3. UKWIN's report on the adverse climate change impacts of incineration, not only quantified the high climate change cost of incineration, but identified that a significant proportion of what is currently considered 'residual waste' is actually readily recyclable or compostable:
- 4. Subsequent to the EDM the Government released their Resources and Waste Strategy, which did not include a moratorium on new waste incineration capacity, but which did:Propose measures for separate collection of food waste and garden wasteAdopt a 65% recycling targetAcknowledge that: "According to our internal analysis...significant additional residual waste energy recovery capacity

such as incineration or advanced conversion technologies - above that already operating or planned to 2020 - would not necessarily be needed to meet an ambition of no more than 10%...Tolvik Consulting Ltd. carried out a similar assessment, bringing together existing reports around Energy from Waste, and concluded that there would not be a gap in incineration capacity in 2030, provided the 65% MSW recycling rate ambition was met.

It is clear that the incinerator is not needed or desirable and is being pursued for personal financial gain by Britannia Crest who stand to gain as at present their land is worthless. The short sightedness of the County to grant this application would mean they have scant regard for the long term sustainable and preferable alternatives to recycling waste.

Yours sincerely,

Victoria Bacon

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE (	CASE				
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	MR ELLIOT BAKER				
Address	38 Greenway Horsham Horsham West Sussex RH12 2JS				
ABOUT YOUR COM	IMENTS				
In what capacity do s  ☐ Appellant ☐ Agent ☑ Interested Party / ☐ Land Owner ☐ Rule 6 (6)	you wish to make representations on this case?  Person				
What kind of represe	entation are you making?				
<ul><li>☐ Final Comments</li><li>☐ Proof of Evidence</li><li>☐ Statement</li><li>☐ Statement of Con</li></ul>					

☑ Interested Party/Person Correspondence

□ Other			

# YOUR COMMENTS ON THE CASE

I hereby object to the appeal to the planning application, granting this appeal would be of direct harm and detriment to Horsham and the surrounding areas, for both ecological and economical reasons, this would affect the air quality, the value and the desirability of Horsham, in order to make a profit for third parties who are unconnected to, and therefore not interested in, the Horsham area.

For official use only (date received): 18/02/2019 19:02:31

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CAS	E	
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS JENNIFER BAKER	
Address	9a Trundle Mead HORSHAM RH12 2LY	
ABOUT YOUR COMME	NTS	
In what capacity do you wish to make representations on this case?  ☐ Appellant ☐ Agent ☑ Interested Party / Person ☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

I am against the incinerator on the grounds of the pollution resulting from the burning of rubbish and it's adverse affect on air quality. I'm also concerned on the impact of additional traffic movements on already busy roads in the area. My understanding is that this method of dealing with waste has been proven to be not the best way of dealing with waste and is in fact being stopped in other countries. If this development is permitted it will likely have an adverse affect on existing nearby homes, schools etc close by to the site and also on the planned/proposed housing development nearby in that developers will not proceed. We need homes, not incinerators.

For official use only (date received): 27/02/2019 08:26:50

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

# Name MR. ANDREW BALDWIN Address 5 Dutchells Copse Dutchells Copse Horsham Horsham West Sussex RH12 5PD

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
□ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground

☑ Interested Party/Person Correspondence	
□ Other	

I am opposed to the possibility of an incinerator here. It will be far too large and will stand out like an enormous eye sore. The sheer size and mass of it makes it unsuitable to be located in a rural environment. I do hope you will refuse it.

For official use only (date received): 03/03/2019 08:42:36

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR ADRIAN BALL	
Address	7 Warnham Road HORSHAM RH12 2QS	
ABOUT YOUR COMME	NTS	
In what capacity do you wish to make representations on this case?		
☐ Appellant		
☐ Agent ☑ Interested Party / Per	rson	
□ Land Owner		
□ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments ☐ Proof of Evidence		
☐ Proof of Evidence ☐ Statement		
☐ Statement of Common Ground		
✓ Interested Party/Person Correspondence		
□ Other		

- 1 where I live I is already rated as having moderate pollution on the BBC website and this is likely to have increased as a result of increased housing. Anyone on the road will tell you the traffic has increased massively in the last few years
- 2 The new housing developments in Horsham will increase the pollution and the number exposed to pollution.
- 3 we are close to a major airport which is a source of pollution and will inevitably expand in the not too distant future with further polltion.

For official use only (date received): 04/02/2019 12:37:35

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

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DETAILS OF THE CASE	E	
Appeal Reference	APP/P3800/W/18	/3218965
Appeal By	BRITANIACREST	RECYCLING LTD
Site Address	Former Wealden Langhurst Wood Horsham RH12 4QD Grid Ref Easting: Grid Ref Northing	S17058
SENDER DETAILS		
Name	MRS LEANNE BAI	NNISTER
Address	48 Titmus Drive Crawley RH10 5ER	
Company/Group/Organis	sation Name	Rusper Parish Council
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments ☐ Proof of Evidence ☐ Statement		
<ul><li>☐ Statement of Common Ground</li><li>☑ Interested Party/Person Correspondence</li></ul>		

Along with their original comment, Rusper Parish Council would ask the Inspector to consider the overall effect of the pollution and traffic generated not only from by the Incinerator, but also from Gatwick Airport (which has unveiled new plans for expansion in its Master Plan) and the strategic site of Land North of Horsham, which plans for 2500 new homes.

For official use only (date received): 02/03/2019 11:38:20

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

# Name MR DERRICK BARENDSE Address 41 Arundale Walk Highwood Horsham Horsham West Sussex RH12 1QW

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
□ Interested Party / Person
☑ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☑ Statement
☐ Statement of Common Ground

☐ Interested Party/Person Correspondence	
□ Other	

I refuse to have this incinerator in Horsham. It would harm the landscape, have an impact on my health. I moved to Horsham from London for cleaner air and for health reason. This is not acceptable

## **Jane Moseley**

From: Sandra Barron

Sent: 09 February 2019 11:51

To: helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal reference: APP/P3800/W/18/3218965

#### Dear Ms Skinner

I understand that although we have objected once before we have to do it again for the next round of appeals etc.

I would just like to record two more objections for both myself and my husband.

Our names our
Martin and Sandra Barron

We feel that this development is just too much - too visible, too much disruption, too close to other dwellings and just too much of an impact on the surrounding area.

My email address is on this and my husband is:

Please can you confirm that our objections are been recorded regarding this development.

Many thanks

Sandra and Martin Barron

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From: Barry Marshall

**Sent:** 15 February 2019 17:55

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Wealdon Brickworks

Helen Skinner, The Planning Inspectorate, Room 3/J Temple Quay House 2 The Square Bristol BS1 6PN

Dear Ms Skinner

Re: Incinerator Appeal at the former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex County Council's planning register (reference WSCC/015/18/NH)

#### I am writting to strongly object to the proposed incinerator by Britaniacrest for the following reasons:

#### **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.

The site is too small for what is proposed in the way of an incinerator and the landscape planting.

#### **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.

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.

#### **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 Sincerely

Barry Marshall

## **Jane Moseley**

From: Vicky Bassett <

**Sent:** 04 March 2019 21:53

To:Helen.skinner@pins.gsi.gov.ukSubject:Ref: APP/P3800/W/18/3218965

Dear Sir/ Madam

I am writing to object to the proposed Horsham incinerator location in North Horsham.

I object on the following grounds of Noise and air pollution in a high populated area

The area is already plagued by traffic which would only worsen with heavy lorries associated with the incinerator

Risk of disruption to the ground from vibration

I strongly believe the incinerator should not be built on this site.

Yours sincerely

Vicky Bassett

Sent from my iPhone

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MS TERESA BENTLEY	
Address	12 Depot Road HORSHAM RH13 5HA	
ABOUT YOUR COMME	NTS	
In what capacity do you wish to make representations on this case?		
☐ Appellant ☐ Agent		
☑ Interested Party / Per	rson	
☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence ☐ Statement		
☐ Statement of Common Ground		
<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>		

I do not agree with WSCC's assessment on the impact of this site as outlined in their recent email advising that they will not defend the new appeal.

My main concerns are detailed below.

Loss of amenity for residents, including noise, odour, traffic and pollution. The latter is of particular concern to me as there is a genetic disease in my family (LHON), which means that blindness could result from exposure to pollutants and smoke.

There is significant research to support the concerns that incinerators are detrimental to the environment and human health, so I am at a loss to understand why establishing one so close to a growing town is considered as good idea. It has been clearly demonstrated that the pollution would drift into the town and inhabited areas; why take such a risk with people's health? Ignoring this evidence opens up the company and council to being sued for negligence. Our understanding of the impact of pollutants is developing quickly and this can not be ignored; 5 years ago wood burning stoves were all the rage and now we are being told not to use them.

The design is at odds with the size of the site, surroundings and proposed expansion of the town and its capacity significantly exceeds that required by the town.

Teresa Bentley

For official use only (date received): 27/02/2019 07:31:27

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR LUKE BERRY
Address	12 Wickhurst Lane Broadbridge Heath HORSHAM RH12 3LX

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

I see that the council is only contesting the visual amenity section of the appeal, and I agree that the impact would be unacceptable, but I would like to go further and say that I am fundamentally opposed to new incinerators being built anywhere, on principle. An incinerator locks a community into producing enough waste to fuel it, when we should instead be concentrating on producing less waste and on recycling more. The local wildlife and the human population will be affected catastrophically by the emissions of this plant, in ways that are not well understood. I know of no incentive in place that will ensure Britanniacrest runs the plant in a conscientious way, the only incentive being to burn a certain amount of waste to keep the incinerator running. How often will the incinerator be inspected? Once a year? Well that would be one day a year when the scrubbers have to be working and 364 when they can be left to fail. Britanniacrest is a business and will only respond to incentives. In this case, they will be in no way inclined to do anything other than to burn whatever they can to keep their plant running, whether recyclable or not. Meanwhile the public will become even more cynical about the need to recycle, as they know most of it will simply be burned. This is at a time when it is critical that we act in defence of the climate and the planet. I understand that the appeal is not being contested due to the application's compatibility with 'the original planning permission'. But since this 'original permision' was granted, we have been told by the UN that we have 10 years to prevent runaway climate change, and by numerous scientific studies that insect populations have dramatically declined in the last 20 years, risking a collapse of the ecosystem from the ground up. Things move fast. In the face of this international emergency, what can we do as one small town? We can oppose and deny local developments that are contribute to the crisis. The 'original planning permission' itself should be reconsidered, and the appeal rejected. Such a decision, like the decision to reject the application in the first place, would enjoy widespread support both in the community and nationally, and would be a contribution to the global fightback against the final death of our ecosystem; the only known life-size supporting ecosystem in the galaxy. It may be a controversial decision to take. It might possibly overreach the mandate of the decision makers. But it would be a decision of which Horsham could be proud.

## Jane Moseley

From: MARK BESSANT

**Sent:** 04 March 2019 13:58

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning appeal - Britaniacrest recycling -

Dear Helen,

I am writing to add extra comments to my original objection to the plans for the Britaniacrest Recycling site (Incinerator) in Warnham (Appeal Reference APP/P3800/W/18/3218965)

The bases of my objections are:

- Scale, location and visibilty of the development
- Pollution concerns, including effects of smoke and emissions from the very high chimney and from the lorries which will deliver to the plant.
- Night time noise intrusion
- Confusion and lack of detail over the exact height and design of the chimney/flue
- Aviation lights and site illumination
- the accuracy of the power generation assessment.

The development is of a scale and impact totally out of proportion to the countryside location, the local environment and its proximity to residential areas.

Kind regards

Sarah Bessant

This email has been scanned by the Symantec Email Security.cloud service. For more information please visit <a href="http://www.symanteccloud.com">http://www.symanteccloud.com</a>

## Jane Moseley

From:

**Sent:** 06 February 2019 22:01

**To:** jane.moseley@westsussex.gov.uk

**Cc:** ct.letters@jpress.co.uk; helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham

APP/P3800/W/18/3218965 & WSCC/015/18

### Ms Moseley

I have just received your email regarding the West Sussex CC position on the above appeal. I am shocked and appalled at the councils response to the appeal and the reversal of the decision made during the planning process. I write to you for clarification of the same and I outline my questions as follows:

- (i) Need you state that the incinerator is part of the WSCC waste plan. This is surely not the case as in previous statements it was NOT part of the WSCC waste plan what has changed and why? Given the overwhelming evidence and statement of fact that the majority of incinerators in the U.K. are running under-capacity. I dispute your claims that this incinerator is needed and I find your reasons inadequate. You also fail to acknowledge the hugely negative impact this incinerator will have on recycling rates.
- (ii) Highway Capacity and Residential Amenity. What assurances have you had that HGV traffic will not increase? Given that this facility will be operated 24/7 this is a very naive statement and is inaccurate. How will capacity be policed and what provisions have been made if the capacity is eroded? I fail to understand how the waste will get to the incinerator without the need for an increase in HGV traffic. The infrastructure is already unable to cope and this will just add to an increase in traffic.
- (iii) Public Health. This is my biggest concern. You state that you have no evidence that this incinerator will be a public health concern. Well my question to you is what evidence do you have that this facility will not be a public health concern? This has not been fully substantiated by you yet you have made this decision based on no scientific fact. As mentioned I am extremely concerned and wholly disappointed in your findings which are both naive and inaccurate and would like answers to the above questions. This incinerator has been strongly contested by the local community and yet WSCC have not assessed it fully before backtracking on its original findings. I am deeply concerned that WSCC have an ulterior motive and I feel that myself and the local community have been let down badly by those elected to represent us. In short your response is a appalling and unjustified.

I look forward to your reply.

Regards
Jacqui Birch
Lower Chickens Farm
Dorking Road
Horsham
West Sussex
RH12 3RY

Sent from my iPhone

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

SENDER DETAILS	
Name	MRS JACQUELINE BIRCH
Address	Lower Chickens Farm, Dorking Road Warnham HORSHAM RH12 3RY

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

I would like this appeal to be REFUSED in its entirety. I am a local resident and I strongly disagree with this appeal. WSCC have already declined the planning permission for this incinerator for many reasons and these have not changed. The facility is not in the interest for the local community and would cause me huge concern for the environment. The toxic emissions, additional traffic, visual effect, light pollution and the negative effect on the countryside and the residents is unprecedented in West Sussex. There is no plan on how this facility will be monitored both for the toxic fumes and traffic in an areas where the infrastructure is already failing. Incinerators in the UK are currently running below capacity so this facility is not required and would be determental to the government and local authorities recycling targets. This incinerator is for commercial use to the detriment of the local area and would be wholly inappropriate. I would be concerned over the motivation of conserned parties should this appeal be granted given the negative reaction the local community has voiced. My comments made to the WSCC planning committee are still valid and I respectfully ask the decision makers to refuse this application and thus bring an end to this facility once and for all.

For official use only (date received): 25/02/2019 20:46:36

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CASE				
Appeal Reference	APP/P3800/W/18/3218965			
Appeal By	BRITANIACREST RECYCLING LTD			
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349			
SENDER DETAILS				
Name	MR COLIN BISHOP			
Address	71 Farhalls Crescent HORSHAM RH12 4BT			
ABOUT YOUR COMME	NTS			
In what capacity do you wish to make representations on this case?				
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)				
What kind of representation are you making?				
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>				

I support this application.

The Horsham area is fortunate to have an operator prepared to provide a modern efficient comprehensive recycling and energy facility to deal with the endless flow of waste from our Society and removes the failure of all householders to put in enough effort to perform recycling - in Horsham DC it is only 50% and HDC's constant effort to inform the fussy waste segregation requirements will never be any more effective. This facility will be set in an area soon to be engulfed with 2500 homes and cannot be seen as anything more than an inevitable consequence of the unrelenting population growth and the waste it produces. If it is a significant part of the newly built up area, it will serve to remind everyone why it is needed.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE	CASE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR GEOFFREY BRAGG
Address	8 Dover Close Southwater HORSHAM RH13 9XX
ABOUT YOUR CO	MMENTS
In what capacity do  ☐ Appellant ☐ Agent ☑ Interested Party ☐ Land Owner ☐ Rule 6 (6)	you wish to make representations on this case?  / Person
What kind of repres  Final Comments  Proof of Evidence  Statement of Comment	e

☑ Interested Party/Person Correspondence

☐ Other

It has not been demonstrated that the facility is needed to reduce land fill waste. There would be an unacceptable impact on landscape and visual amenity of the area. There would be an unacceptable impact on highway capacity and increased pollution and noxious gases from continuous heavy vehicles going further and further as recycling improves to keep the facility full of non-recyclable waste to provide profits from the development and to run the facility at its most efficient by having day and night incineration. An unacceptable impact from the development to public health and creates adverse Climate change impacts.

From: Brian Thompson
Sent: 23 February 2019 10:47

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning Appeal APP/P3800/W/18/3218965.

Dear Helen,

I wish to object to the Planning Appeal APP/P3800/W/18/3218965 for construction of an incinerator at Horsham for the following reasons:

Visual impact, the proposed incinerator building will be 35.92 m in height with a much taller chimney. So this monstrosity will be seen from miles away, including areas of outstanding natural beauty.

The proposed site is too small.

The CAA has demanded the middle and top of the stack be lit at night due to flight routes, so light pollution will be significantly increased.

The site will be operated 24/7 so will create ambient noise experienced by rural areas above that currently in place of 30-35 dB decreasing at night.

WSCC has already given permission for an incinerator in Ford (2014). It should be asked why another is needed in this county?

Regards, Brian Thompson Wattlehurst Barn Dorking Road RH12 3SD 
 From:
 Jill & Brandon

 Sent:
 03 March 2019 17:03

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning Application Appeal Ref. APP/P3800/W/18/3218965

Dear Ms Skinner,

We write regarding the appeal reference as per above relating to the Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

We would like to reiterate our previous objections and continue to strongly oppose this application and subsequent appeal on numerous grounds.

The application remains at odds with the West Sussex local plan to protect the health and amenity of local residents. Britaniacrest have provided little or no toxicity data, details of the resultant pollution or possible impact to air quality.

The visual impact of a permanently lit chimney 95 metres high on the edge of an area of outstanding beauty cannot be underestimated.

The proposal far exceeds the requirements for West Sussex, if the anticipated waste source is a combination of domestic, commercial and industrial waste from outside the county then a site more suited to support this volume in an existing industrial area should be considered instead of an unsuitable rural location.

The recent approval to build up to 2000 homes on land north of the A264 will site these homes in close proximity to the proposed incinerator, there is also a junior school planned as part of this development. We need the additional housing but who will want to be living downwind of a plume of unknown pollutants?

Horsham District Council has a recycling target to reach 50% By 2020, this is the national target and is supported by the recent change to fortnightly refuse collections to encourage more recycling. It is claimed that 57% of the waste we throw away can be recycled so where is the incentive to recycle more when this proposal will only encourage more waste to justify its existence at a time when there is already an overcapacity of incineration in the UK. Furthermore we are constantly being reminded to reduce, reuse and recycle.

In summary the proposal represents nothing more than further industrialisation of our rural landscape and a profit centre for what is an outdated method of handling a dwindling supply of waste and is therefore the wrong solution in the wrong place.

We ask that you uphold the rejection of this application and dismiss the appeal.

Yours sincerely,

Brandon and Jill Pleasant 103 Ropeland Way, Horsham, RH12 5NZ



Appeal Ref: APP/P3800/W/18/3218965

Site Address: Former Wealden Brickworks Site, Langhurstwood Road, Horsham, West

Sussex, RH12 4QD

Description: Recycling, Recovery and Renewable Energy Facility and Ancillary

Infrastructure

Application Ref: WSCC/015/18/NH

Appellant: Britaniacrest Recycling Ltd

Start date: 14 January 2019

Warnham Parish Council opposes the appeal proposals. The reasons for this overlap with those of the LPA.

## **Objection to the Appeal**

Warnham Parish Council's original objection was submitted in April 2018. In the light of the appeal against refusal and the legal advice provided to the WSCC Planning Committee the Parish Council has reviewed the original submission and amended the scope of the Council's submission.

The bases for the objection are:

- 1. Non-compliance with policies of WSCC's Waste Local Plan
- 2. Scale, location and visibility of the development
- 3. Aviation lights and site illumination
- 4. Lack of robust flue stack design
- 5. Power generation assessment
- 6. Pollution concern.

Items 4 and 5 are additional to the original objection.

## 1. Non-compliance with policies of WSCC's Waste Local Plan

Due to the scale and location of the facility 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 with the WSCC Waste Local Plan.

**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 and that they reflect and, where possible, reinforce the character of the main natural character areas; and on (b) the distinctive character of character of towns and villages.

The proposal will have a dramatic adverse effect on the character and ambience 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 and activities; (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 of a nature and scale that render it unable to meet this policy.

## 2. Scale, location and visibility of the development

A prominent feature adjacent to the application site is the chimney to the Wienerberger brickworks. This chimney is reported to be 26.5m high. The proposed building, at 35.92m height and approximately 140m long, is vast and will be 1.36 times as high as the existing chimney. The proposed flue stack, at 95m, is over 3.5 times the height. The sketch shown in Appendix A with the brickworks chimney superimposed shows the scale of the proposal in comparison to the existing

The existing chimney is readily visible from roads in the area. A development of this scale will present an unacceptable visual and physically overpowering intrusion into the rural countryside, the locality and the environment of residential developments, particularly those in Station Road, Warnham.

The illustrations submitted by the applicant demonstrate the dominance, visual impact and hence intimidating nature of the building and accompanying stack. The building itself will be visible from housing in Station Road, from much of Warnham village and many surrounding rural houses. The flue stack and/or its plume will be visible from locations in the parish and as far away as Box Hill, Surrey. It is unacceptable that any industrial development in the countryside should have a visual exposure over such an extensive rural area.

The majority of Warnham village is a Conservation Area and the parish has over 90 Listed Buildings. Visual impacts of this dominance will degrade the value of the heritage assets of the parish and its conservation status. The intrusion of the stack will be particularly intimidating at times when the exhaust plume is being emitted.

The visual impacts are assessed in the application documentation from many locations in the village and parish. Despite the acknowledgement that the building roofline and flue stack will be visible from most locations it is not reasonable that the impact of this vast development from all locations is mainly assessed as 'Minor Adverse' impact. The visual impact on the cluster of residential properties at Andrews Farm, Station Road is assessed as 'Moderate to Major'. It is not reasonable

that this alien development should have an adverse impact of any significance on any residents and views of the parish.

## 3. Aviation lights and site illumination

The flue stack and building will have aviation lighting. The roads and vehicle manoeuvring areas surrounding the plant will have lighting. Multiple sources of continuous lighting and an ambient lighting glow from the site will be an unwelcome intrusion to the countryside night skies.

#### 4. Flue stack

The lack of evidence of the flue stack design is of concern. At 95m high and 2.5m diameter it is extremely slender but at an exhibition of the proposals a representative of the applicant stated that the flue stack had not yet been fully designed. Reference was made to a comparable plant in Cornwall as an example of how the actual stack may look. This has two adjacent, linked flues of 120m. It is possible that the final design of the stack will require a structure of greater diameter than that indicated, or multiple stacks. The structural design is not proven and needs to be demonstrated - potential wind induced vibrations and harmonic oscillations will be a design issue. It is not uncommon to fit stacks with fins or aerofoils to dissipate wind forces. The addition of external features could greatly increase the width of the stack and thereby extend the potential for visual intrusion, and will render the evidence submitted to date as superseded. Prior to the resolution of the Inquiry the design of the stack should be finalised and its full impact established.

## 5. Power generation

The potential power generation of the plant is 21MW with 18MW available to export to the grid which is claimed to be sufficient to power 43,000 homes. This number of homes represents 77% of the homes in Horsham. The power generation of the plant is promoted as a significant benefit of the proposals yet there is no supporting evidence to justify the output data and claimed benefit. Prior to resolution of the Inquiry the applicant should provide evidence of the output of the plant, the number of homes that can be supplied and the arrangements made with the electricity grid to purchase and transmit the generated power.

#### 6. Pollution concern

Residents in the parish are widely concerned at the potential effect on their health from particulate and other emissions from the flue. Although the plant is required to meet emission standards required by the Environment Agency there remains concern regarding the long-term cumulative impact; this is unproven. Equally, there is concern that process equipment for installations similar to that proposed are often subject to unplanned situations which could result in significant short-term pollution of dangerous intensity. The planning application contained no manufacturer information on the specific thermal treatment installation proposed. The application has not demonstrated that the proposed installation is able to meet the emissions limits and real data from similar installations already operating elsewhere in the country should be provided as evidence, along with any breaches of Environmental Permit conditions, so that an informed decision can be made regarding the likely impacts on local air quality and human health. Considering the rural setting of the proposed installation, further detail on the potential for deposition of heavy metals, dioxins and

PAH's on to crops and impacts on animal rearing should also be provided by the applicant prior to any decision being made.

#### Conclusion

The development is of a scale and impact totally out of proportion to the proposed countryside location, the local environment and its proximity to residential areas of Warnham parish and the village Conservation Area. It will be a blight on the parish and engender anxiety at having such an unwelcome, un-neighbourly process plant on our doorstep.

Warnham Parish Council emphatically request that the appeal is dismissed.

On behalf of Warnham Parish Council,



Mrs A J Brooks,

Parish Clerk

Warnham Parish Council, 5 West Way, Slinfold, RH13 0SB

Tel: E-mail –

April 2018 - Revised March 2019

# **APPENDIX A**

Appeal Ref: APP/P3800/W/18/3218965

Site Address: Former Wealden Brickworks Site, Langhurstwood Road, Horsham, West

Sussex, RH12 4QD

Description: Recycling, Recovery and Renewable Energy Facility and Ancillary

Infrastructure

Application Ref: WSCC/015/18/NH

Appellant: Britaniacrest Recycling Ltd

Start date: 14 January 2019

# Sketch referred to at paragraph 2

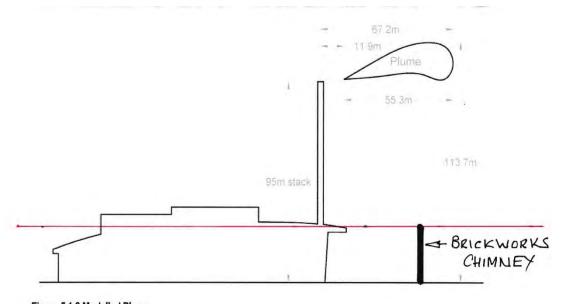


Figure 5.1.2 Modelled Plume

ES Addendum Appendix 5.1 Visible Plume Photomontage Methodology RPS

2018

## Jane Moseley

**From:** John Browning <j

**Sent:** 17 January 2019 19:02

**To:** Skinner, Helen WSCC/015/18/NH

Dear Ms Skinner,

I must object to this application to build an incinerator on this site.

I have lived in Warnham near Horsham for nearly 40 years. The area has changed beyond all recognition due to house building and nothing has been done to ease the burden on the roads. In fact nothing has been done in terms of infrastructure.

Due to the massive increase in house building the roads are always very crowded and I might say in a very bad condition due to the overload.

If the go ahead is given for this incinerator there will be a huge increase in heavy goods vehicle traffic furthermore the roads to the proposed site are country lanes and there is no place for the size and number of vehicles proposed.

In addition the area north of Horsham is due to become a large residential site and with the prevailing wind from the south west this area would suffer from the outgoing fumes/gases.

I trust this appeal will be turned down quickly.

Regards

John Browning 55 Friday Street, Warnham. RH12 3QY

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From: B BROWNING

**Sent:** 08 February 2019 18:00

**To:** helen.skinner@pins.gsi.gov.uk

Subject: BRITANIACREST NEW INCINERATOR LANGHURST WOOD ROAD

Dear Sir/Madam,

I am appealing against the above planning proposal.

- 1) An incinerator on the edge of Horsham, would have a 'disastrous impact' environmentally and economically.
- 2) Impact of facility on Public Health.

The proposed incinerator would only be 5 miles from Horsham town centre.

- 3) Possible pollution from fumes.
- 4) The climate change impacts of incineration are worse than landfill. Most of what is incinerated should be recycled or composted.
- 5) 94 foot chimney stack what an eyesore in the beautiful West Sussex countryside.
- 6) The extra heavy traffic on the roads will be enormous.

We do not have the highway infrastructure to support any extra traffic (especially heavy lorries etc.)

- 7) Impact on road safety.
- 8) Noise disturbance.
- 9) Lack of need there are other similar incinerators in neighbouring counties working under capacity Why would we need one in West Sussex?

Please add my objection to the 'No incinerator 4 Horsham appeal.

Thank you

For official use only (date received): 02/03/2019 17:00:27

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
CENDED DETAILS		

# Name MRS PAMELA BUCKNALL Address 6 Kingfisher Way Horsham Horsham West Sussex RH12 2LT

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence

|--|

## YOUR COMMENTS ON THE CASE

The roads around the site are unsuitable for more heavy traffic, eg the A24 north. The rubbish will be brought in from outside the area and the closure of the A23 at Gatwick on Feb 24th 2019 is an indication of the problems a Brittaniacrest Lorry can cause. There is bound to be pollution, no system is 100% perfect, and it will affect the whole area including all the 1000's of new homes being built. The chimney proposed will be an eyesore and blight the area. We are very close to the Surrey Hills which is an area of outstanding natural beauty. Please let us keep as much of our countryside as possible clean and tidy for the future.

For official use only (date received): 02/03/2019 18:49:53

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR WILLIAM BUCKNALL	

6 Kingfisher Way Horsham Horsham West Sussex

West Sussex RH12 2LT

Address

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
□ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence

	Other			
1				

## YOUR COMMENTS ON THE CASE

This development would have an unacceptable impact on the public health of an area planned for residential use as well as the wider area of Horsham District, from the large number of lorries carrying the waste in, the pollution caused by the incineration, to the impact on the visual amenity of the area. There has been no demonstration of the need to manage the treatment of waste in the West Sussex area, so presumably this will mean waste for incineration being brought in from a large part of S.E.England.

### Jane Moseley

From: Mike Bullen

**Sent:** 15 February 2019 16:00 **To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Incinerator appeal

Helen Skinner, The Planning Inspectorate, Room 3/J, Temple Quay House, 2 The Square, Bristol BS1 6PN

Dear Ms Skinner

Re: Incinerator Appeal at the former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex County Council's planning register (reference WSCC/015/18/NH)

We would like to strongly object to the proposed incinerator by Britaniacrest for the following reasons:

### **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.

The site is too small for what is proposed in the way of an incinerator and the landscape planting.

### **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.

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.

### **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 sincerely



# Mike Bullen

2 Clemsfold Farm, Guildford Road, Broadbridge Heath, Horsham, West Sussex. RH12 3PW

E-mail :-

This email has been scanned by the Symantec Email Security.cloud service. For more information please visit http://www.symanteccloud.com

# **Jane Moseley**

From: Sent: To: Subject:	04 March 2019 14:46 noincinerator4horsham@gmail.com; helen.skinner@pins.gsi.gov.uk Re: Appeal Reference: APP/P3800/W/18/3218965
Thank you for your help. Last night I was so busy & I sh it was a very late night.	hould have sent the email on the planning website, but I realised this too late
My address is 119A PONDTA HORSHAM WEST SUSSEX RH12 5HT	IL ROAD
Pam	
l message From: Date: 04/03/19 - 13:23 (GMT) To: Subject: Appeal Reference: A	helen.skinner@pins.gsi.gov.uk
Dear Pam,	
	lanning Inspector in your email below which I am forwarding to Helen Planning Inspector before the deadline of midnight today.
Please send Helen your address	s so that she can add it to your comment below.
Many thanks,	
Kind regards,	
Karen	
No Incinerator 4 Horsham C	ommunity Group
On Mon, 4 Mar 2019 at 02:43, Please forward this to plannin	

I write to request that the building of a commercial incinerator for Horsham is refused permission. The damage to an ever increasing population in Horsham is unacceptable, & would harm the health of so

many people.

The number of new homes being built in Horsham is high. Why allow so many new houses to be built & deliberately hurt the new residents.

Existing residents do not want the environment damaged, & harm brought to what is one of the finest towns in the U.K.

Council has a responsibility to care for residents, to protect them, & to honour the commitment to society to provide an enduring safe place to live.

The increased traffic volume would be detrimental to the quality of life Horsham offers.

There is a need for a proper hospital in Horsham, with the population increase, & this should be considered instead of allowing such anti social activities to be developed.

Horsham Council needs to look after the future of children who reside here, & this cannot be managed by such a shameful & harmful addition to the long term environment.

Horsham is a fine town, why would anyone want to inflict on the residents a commercial activity which increases road usage ( & damage to roads which require additional repairs) & impacts on the lives of so many people?

Horsham will flag up to other commercial operators 'that anything goes' if a request for such an anti social installation is agreed.

The residents deserve integrity, management & care by the Council. Do not signal that residents do not matter, by agreeing to this application

Please refuse it, & concentrate on continuing to provide Horsham with first class facilities, which benefit the community for the future.

I am a concerned resident. I do not want Horsham to suffer from such a detrimental addition, which will in itself cause more strain on the health service, as residents are harmed by air quality being at risk, when (as can happen) breakdowns in equipment cause breathing difficulties to anyone who possesses less than perfect health.

Think of all of our futures & refuse this application. Do not bring more waste to Horsham. Allow Horsham to be free from increased traffic, pollution & maintain the area with regard to all of our futures.

Pamela Burbidge Resident, Council Tax Payer Address & contact details can be provided.

Please be fair to Horsham. Do not agree to this application at all.

Sent from my iPad

For official use only (date received): 26/02/2019 16:03:39

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	COUNCILLOR PETER BURGESS		
Address	27 Haybarn Drive HORSHAM RH12 5JF		
ABOUT YOUR COMMENTS			
In what capacity do you wish to make representations on this case?			
☐ Appellant			
☐ Agent  ✓ Interested Party / Person			
□ Land Owner			
□ Rule 6 (6)			
What kind of representation are you making?			
☐ Final Comments ☐ Proof of Evidence			
☐ Proof of Evidence ☐ Statement			
☐ Statement of Common Ground			
✓ Interested Party/Person Correspondence			
□ Other			

### YOUR COMMENTS ON THE CASE

I object to this application for the following reasons:

- 1. This is a rural site and a building of this size will be completely out of place.
- 2. Traffic. The applicant states that there will be no increase in traffic. This is not true. The applicant is only using a fraction of the movements he has been allowed. If this comes on stream, then there will be huge increase in movements on a small unclassified rural road. He notes correctly, that the original planning consent allows this, but this should have been challenged. The WSCC roads authority did not take into account the very large number of movements already allowed to other users.

For official use only (date received): 28/02/2019 19:55:50

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE				
Appeal Reference	APP/P3800/W/18/3218965			
Appeal By	BRITANIACREST RECYCLING LTD			
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349			
SENDER DETAILS				
Name	MISS KIMBERLEY BURKE			
Address	70 Hillside Horsham RH12 1NG			
ABOUT YOUR COMMENTS				
In what capacity do you wish to make representations on this case?  ☐ Appellant ☐ Agent ☑ Interested Party / Person ☐ Land Owner ☐ Rule 6 (6)				
What kind of representation are you making?				
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>				

# YOUR COMMENTS ON THE CASE

Not happy to have this in my local area. we moved to horsham to get away from traffic, pollution, and waste and it is not welcome in this area as seen by local residents protests and rejection by county council. find somewhere else for this

For official use only (date received): 25/02/2019 19:01:45

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR MARTIN CALWAY	
Address	1 Tuggles Plat Warnham HORSHAM RH12 3RA	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> </ul>		
☐ Statement of Common Ground  ☑ Interested Party/Person Correspondence		

□ Other

## YOUR COMMENTS ON THE CASE

I would like to confirm my objection to the Incinerator Plant Planning Application based on the following grounds;

- 1) Scale, location and visibility of the development, including the height of the flue stack.
- 2) Increase in HGV traffic on what is already a very busy and dangerous road.
- 3) Aviation Lights and site illumination.
- 4) Night time noise and intrusion.
- 5)The accuracy of the power generation assessment.
- 6) Pollution concerns.

From:

**Sent:** 21 February 2019 17:06

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** appeal

Include your: name and address,

appeal reference APP/P3800/W/18/3218965 an site address:

Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

Dear madam. I live in the middle of a row of what used to be the brickwork's cottages adjacent to this site. I am writing to implore you to dismiss the appeal for an enormous new incinerator at the former brickworks. Having fought successfully to have the application rejected by the council, citing six grounds for doing so, we are dismayed to discover that the councillor who was publicly and adamantly pro incinerator is now charged with putting forward the case for its rejection to you. I discover that having taken 'advice' she has dropped all but 1 of the reasons to object to the appeal. it is not at all clear what the exact details of this advice and its sources are. It appears that the dismissal of the five out of six reasons for objection are based largely on supposition more than fact. We all know that lack of hard evidence for something that hasn't yet happened does not equate proof of truth or outcome. There is a good deal of grey area and unproven statements which the councillor has accepted as fact and given benefit of doubt to the applicant rather than the people she is supposed to be representing and therefore is refusing to put forward those arguments on my behalf. This proposed building is a private commercial concern and is truly massive... the chimney stack alone is taller than the statue of liberty and the building itself will be highly visible and out of place in its setting which is visible from top beauty spots in the area, even if the stack is reduced by a few meters it will not alter its visible impact.. I am astonished at the lie given from the applicant that the building will not be visible. Such a blatant lie gives question to the truth of the other facts given by this applicant. Truths which will affect for example the amount of road traffic and the effect of such, but which the councillor accepts the applicants current statement that this will not increase. it is also in an area extremely close to residents and where there is planning approval in place for housing developments nearby. This site is simply inappropriate for such a huge construction which will be a devastating blot on the landscape surrounding the lovely market town of Horsham and its surrounding villages. Currently when you look at this area you see green fields and trees... a building of this size and scale is well above the tree height and will be an ugly blight seen from as far as Leith hill and the South Downs. I am one small voice amongst a group of small voices who does not have the resources to fight against the consequences and affects of this building being built adjacent to our homes, consequences that are being played down by the applicant. I would also like to point out that with the current trend moving more and more towards developing bio degradable and reduced packaging, recycling, eliminating single use plastics and other groundbreaking initiatives I feel that there will in the next few years be a rapid decrease in waste from the public sector. New incinerators are not the way to move forward in a progressive and healthy direction. Please consider my appeal to you and reject this application for the final time.

Yours Caroline Debansi 7 Station road warnham West Sussex RH123SR From:

**Sent:** 26 February 2019 11:12

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** incinerator

How can all of the grounds which the council based their refusal on for this application suddenly be dismissed. by the (previously Pro incinerator) council member who is now supposed to be representing the public to fight against the appeal? This is seriously wrong. Caroline Debansi

From:

**Sent:** 26 February 2019 11:23

**To:** helen.skinner@pins.gsi.gov.uk

Subject: appeal

appeal reference APP/P3800/W/18/3218965 and site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

re the above proposal. Any suggestion that a 92 meter will have no or low visual impact on an area that is predominantly trees and fields is an opinion that can only be held by someone who does not live in the area near to the said chimney and I put forward an opposing opinion held by local residents that said chimney would be a blight on the landscape and cause a daily considerable distress to those residents. Caroline Debansi. 7 station rd, warnham, West Sussex, RH123SR

For official use only (date received): 20/01/2019 19:46:41

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks	
	Langhurst Wood Road Horsham	
	RH12 4QD Grid Ref Easting: 517058	
	Grid Ref Northing: 134349	

SENDER DETAILS	
Name	MRS KATIE CARTER
Address	18 Church Road Broadbridge Heath West Sussex RH12 3LD

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

### YOUR COMMENTS ON THE CASE

I wish to object to the incinerator that is planned for Horsham. Horsham is undergoing massive development at the moment and the infrastructure is not there to support the increase of traffic that this is bringing. If a new incinerator was to be built this would increase the traffic even more and this traffic would be 24 hours a day. I am concerned at not only the increase in traffic but the level of noise and pollution this will bring. Horsham is a lovely town with lots of young families and as a parent of very young children myself I am incredibly concerned at the increase in fumes and pollutants that the incinerator would bring. I've seen wind report about the disposal of the pollutants and it does not look good. I object to the incinerator being built in the strongest possible mannar as I want my children to be able to breathe clean air not air that is filled with things that can harm them.

# **Jane Moseley**

From: NSI.Planning 2 <nsi.planning2@planninginspectorate.gov.uk>

**Sent:** 08 February 2019 09:40

**To:** Helen.Skinner@pins.gsi.gov.uk

**Subject:** FW: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham

APP/P3800/W/18/3218965 & WSCC/015/18/NH

### **FAO Helen**

From: Derek Castle

**Sent:** 08 February 2019 08:40

To: 'NSI.Planning2' <NSI.Planning2@pins.gsi.gov.uk>

Subject: FW: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 &

WSCC/015/18/NH

Hi

Please include the following as an objection to the above WSCC application! Thanks and regards

### Derek Castle

Greenways
27 Gaggle Wood
Mannings Heath
Horsham
West Sussex

RH13 6JR Tel:- 01403 264544

From: Derek Castle

**Subject:** FW: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 & WSCC/015/18/NH

Ηi

For your information! Kind regards Derek Castle

From: Derek Castle

**Sent:** 07 February 2019 16:28

To: 'Jane Moseley'
Cc: 'Louise Goldsmith'

Subject: RE: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 &

WSCC/015/18/NH

### H Jane

I hear what you say however, I feel you should defend every single issue as robustly as possible. As I said previously Britaniacrest is a business for making money and, every business looks to increase its revenues and profits every year on year, this is called growth. This will be done by increasing the size of the business, therefore everyone of the six objections is as important as one another as they will grow in turn with the business and the whole problem will in turn escalate.

I strongly feel that by defending just one of the objections it will be weakening your case and, also if you lose, you will have let down the inhabitants of the HORSHAM DISTRICT, resulting in the ruination of a very pleasant area and bearing in mind one of the most important points being the new ten thousand inhabitants of the close by NORTH HORSHAM DEVELOPMENT.

### Kind regards Derek Castle

From: Jane Moseley [mailto:jane.moseley@westsussex.gov.uk]

**Sent:** 07 February 2019 09:06

To: Derek Castle; PL Planning Applications

Cc: Louise Goldsmith

Subject: RE: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 &

WSCC/015/18/NH

### Mr Castle

It is not the case that the decision will not be defended. The County Council still intends to defend the appeal, but to ensure that the defence is as robust as possible, will focus solely on the potential landscape and visual impact impacts.

The facility which operates from the Wealden site now has planning permission for a 230,000 tonnes/year throughput. The proposed energy-from-waste facility the subject of this appeal would not have increased this throughput, or the associated vehicle movements. For this reason, it was not considered that this was a robust reason for refusal which would stand up to scrutiny at the appeal.

Hopefully that helps to clarify the position.

# Kind regards Jane.

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council

Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

Email: jane.moseley@westsussex.gov.uk | Web: www.westsussex.gov.uk

From: Derek Castle

Sent: 06 February 2019 17:37 To: PL Planning Applications

Cc: Louise Goldsmith

Subject: RE: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 &

WSCC/015/18/NH

### FAO Jane Moseley

I am sorry but, I do not understand why you are not defending your decisions as mentioned!

Perhaps I am a bit dim or, I have got the wrong end of the stick as they say.

May be you can explain in more detail or a little bit clearer.

A few months ago I was in Redhill Surrey when two enormous lorries from Company that runs the bricworks travelled through the high street, absolutely worrying as to what could happen in the Horsham West Sussex area.

Some clarity on this would be greatly appreciated.

Regards

**Derek Castle** 

From: Jane Moseley [mailto:jane.moseley@westsussex.gov.uk] On Behalf Of PL Planning Applications

**Sent:** 06 February 2019 13:41 **To:** Undisclosed recipients:

Subject: Appeal at Former Wealden Brickworks, Langhurstwood Road, Horsham APP/P3800/W/18/3218965 &

WSCC/015/18/NH

This email is going to all interested parties (including consultees) in relation to the above appeal.

Following consideration of legal advice at a meeting of Planning Committee on 5 February 2019, West Sussex County Council will not defend five of the six reasons for refusal being considered in the above appeal.

Specifically, the County Council will not defend the following:

### Reason 1: Need

It has not been demonstrated that the facility is needed to maintain net self-sufficiency to manage the transfer, recycling and treatment of waste generated within West Sussex. Therefore, the development is contrary to strategic objective 3 of the West Sussex Waste Local Plan 2014.

The site is allocated in the West Sussex Waste Local Plan 2014, which demonstrates that there is an identified, quantified need for the waste management capacity that this facility would provide. Furthermore, the site benefits from an extant planning permission (WSCC/021/15/NH) for the same waste management capacity. Accordingly, it is accepted that there is a need for the facility and, therefore, the County Council will not defend this reason for refusal.

### Reason 3: Highway Capacity

The development would have an unacceptable impact on highway capacity, contrary to Policies W10 and W18 of the West Sussex Waste Local Plan 2014.

The proposed development would not involve an increase in HGV movements over that already allowed under the extant planning permission. Accordingly, it is accepted that there is no evidence that there would be an unacceptable impact on highway capacity and, therefore, the County Council will not defend this reason for refusal.

### **Reason 4: Residential Amenity**

The development would have an unacceptable impact on residential amenity, contrary to Policies W10 and W19 of the West Sussex Waste Local Plan 2014.

The proposed development would not result in either an increase in HGV movements or impacts from site operations over those already allowed under the extant planning permission. Accordingly, it is accepted that there is no evidence that there would be an unacceptable impact on residential amenity and, therefore, the County Council will not defend this reason for refusal.

### Reason 5: Public Health

The development would have an unacceptable impact on public health, contrary to Policy W19 of the West Sussex Waste Local Plan 2014.

The County Council accepts that there is no evidence to indicate that there would be an unacceptable impact on public health resulting from the development, acknowledging that no objections were raised in this regard by the relevant statutory consultees (the Environmental Health Officer, Public Health England or the Environment Agency). Further, it is accepted that the planning process should not duplicate other regimes including, in this case, Environmental Permitting. For these reasons, the County Council will not defend this reason for refusal.

### Reason 6: Cumulative Impact

The development, along with other existing, allocated and permitted development, including the North of Horsham development, would result in adverse cumulative impacts, contrary to W10 and W21 of the West Sussex Waste Local Plan 2014.

The proposed development would not result in increased impacts from HGV movements or impacts from site operations over those already allowed under the extant planning permission. Accordingly, it is accepted that there is no evidence that there would be adverse cumulative impacts, and, therefore, the County Council will not defend this reason for refusal.

For the avoidance of doubt, the County Council will defend the remaining reason for refusal at appeal, namely:

## Reason 2: Landscape and Visual Amenity

The development would have an unacceptable impact on landscape and the visual amenity of the area, contrary to Policies W12 and W13 of the West Sussex Waste Local Plan 2014.

### Regards

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

Email: <u>jane.moseley@westsussex.gov.uk</u> | Web: www.westsussex.gov.uk

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# Jane Moseley

Alison Woodfield <alison.woodfield@westsussex.gov.uk> on behalf of PL Planning From:

Applications <planning.applications@westsussex.gov.uk>

15 February 2019 11:36 Sent: helen.skinner@pins.gsi.gov.uk To:

Cc:

/W/18/3218965: Former Wealden Brickworks,

**RH12 4QD** 

**Attachments:** Scan\_0001.pdf

Please see the attached email and document that was sent to us regarding appeal APP/P3800/W/18/3218965 at Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD

Regards Alison

Alison Woodfield | Planning Technician, County Planning, West Sussex County Council | Location: Ground Floor, Northleigh, County I

Chichester, West Sussex PO19 1RH

Internal: x26950 External: 0330 222 6950 | E-mail: alison.woodfield@westsussex.gov.uk

From: Clare Tivey

**Sent:** 15 February 2019 10:00 To: PL Planning Applications

Subject: FW:

From: Derek Castle [mailto:

**Sent:** 08 February 2019 16:50

To: 'West Sussex County Times'; 'West Sussex County Council'; Louise Goldsmith; 'No Incinerator 4 Horsham';

### Subject:

Hi all

Kindly read the attached article that says it all for me.

Please, please think of the damage that could well be caused if the application is passed.

Please consider the young children of today and tomorrow and, the inheritance that we will leave for them!

Please think deeply of the 2750 families that will be moving into the nearby Legal and General North Horsham development.

Please don't give into the system.

Please fight this absurd application and, clear one's own conscience from what would be a total tragedy for future generations.

Kind regards Derek Castle

## Mannings Heath

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# Jane Moseley

Alison Woodfield <alison.woodfield@westsussex.gov.uk> on behalf of PL Planning From:

Applications <planning.applications@westsussex.gov.uk>

15 February 2019 11:36 Sent: To: helen.skinner@pins.gsi.gov.uk

Cc:

Planning Inspectorate APP/P3800/W/18/3218965: Former Wealden Brickworks, Subject:

**RH12 4QD** 

**Attachments:** Scan\_0001.pdf

Please see the attached email and document that was sent to us regarding appeal APP/P3800/W/18/3218965 at Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD

Regards Alison

Alison Woodfield | Planning Technician, County Planning, West Sussex County Council | Location: Ground Floor, Northleigh, County I

Chichester, West Sussex PO19 1RH

Internal: x26950 External: 0330 222 6950 | E-mail: alison.woodfield@westsussex.gov.uk

From: Clare Tivey

**Sent:** 15 February 2019 10:00 To: PL Planning Applications

Subject: FW:

From: Derek Castle [mailto:

**Sent:** 08 February 2019 16:50

To: 'West Sussex County Times'; 'West Sussex County Council'; Louise Goldsmith; 'No Incinerator 4 Horsham';

joshua.powling@jpress.co.uk

Subject:

Hi all

Kindly read the attached article that says it all for me.

Please, please think of the damage that could well be caused if the application is passed.

Please consider the young children of today and tomorrow and, the inheritance that we will leave for them!

Please think deeply of the 2750 families that will be moving into the nearby Legal and General North Horsham development.

Please don't give into the system.

Please fight this absurd application and, clear one's own conscience from what would be a total tragedy for future generations.

Kind regards Derek Castle

## Mannings Heath

This email and any attachments are confidential and intended solely for the persons addressed. If it has come to you in error please reply to advise us but you should not read it, copy it, show it to anyone else nor make any other use of its content. West Sussex County Council takes steps to ensure emails and attachments are virus-free but you should carry out your own checks before opening any attachment.

# **Jane Moseley**

From: Derek Castle >

**Sent:** 17 January 2019 18:35

**To:** Skinner, Helen

**Subject:** APP/P3800/W/18/3218965

ΗΙ

This application is for a business to make money, that is what businesses are for!

Absolutely fine but, not ever to the detriment of the surrounding countryside nearby villages and close to the nearby proposed NORTH HORSHAM development in fact, almost a new conurbation of 10,000 inhabitants.

HEAVY DUTY lories will be coming from all over the place and even from LONDON and the SOUTH COAST resulting in ruination of a beautiful area.

It would be absolutely ridiculous to approve this application!

Thanks and regards
Kindly confirm safe receipt of this objection.

Derek Castle Greenways 27 Gaggle Wood Mannings Heath Horsham West Sussex RH13 6JR

# Jane Moseley

From: Peter Catchpole

**Sent:** 01 March 2019 21:38

**To:** helen.skinner@pins.gsi.gov.uk

**Cc:** Rosemary Couchman (

Wealden Brickworks,

Langhurstwood Road, Horsham RH12 4QD.
Planning Inspector Submission for Appeal.docx

Please find attached my comments regarding the appeal being heard by the Planning Inspecorate about the proposed incinerator in Horsham

Best Wishes

**Attachments:** 

Peter Catchpole

**WSC Councillor Holbrook** 

# Britaniacrest Incinerator Application Appeal Reference APP/P3800/W/18/3218965

### 1)Introduction

Over the past two years there have been 2 x consultations regarding this incinerator application.

The residents of North Horsham have worked hard to ensure we had the highest response I have known to a proposed development in our area.

Rightly people are concerned about their future wellbeing and that of future generations if the incinerator comes to this area and the wholesale change of character that would be brought to our market town. It would be out of keeping with its surroundings, the massive structure would overwhelm existing buildings in the surrounding area and would have significant adverse impact on views.

The scale form and design including landscaping would not integrate with nor enhance adjoining land uses as Policy W11 and W12 require.

That is why over 5,500 people rejected these plans:

1167 objection More than in the first round of planning in 2017 Over 4500 signed a petition saying NO to having and incinerator in North Horsham

This overwhelming NO vote is democracy at work and should be given the weight it deserves and fully respected.

# 2) Horsham has done its bit for WS Residents on Waste

Over a number of decades Horsham has been taking the burden of waste disposal for all West Sussex residents. From a waste perspective Horsham has been consuming the smoke of West Sussex Residents, what is not now acceptable is consuming the smoke of everyone else's Commercial and Industrial Waste in SE England through this market driven incinerator development, that is not linked to any WSCC or other public sector service contract.

# 3)i) Is this facility a Recovery vs. Disposal plant?

Of great concern to local people is that the developer has submitted an application for a 3Rs facility which is suggestive of "recovery" (80%) in terms of the waste hierarchy, but 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 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. If the application is being decided on the basis that the proposal will be an R1 Recovery facility then I believe it is necessary to impose a R1 Planning Condition as West Sussex CC did for application WSCC/096/13/F for Grundon's Circular Technology Park proposal in order to ensure that the proposal would move waste up the waste hierarchy and to ensure compliance with Policy W10 of the West Sussex Waste Local Plan.

This key point has been made by a number of other commentators and must be addressed. WSCC did not make this condition as we think it should and it cannot be the position to expect the Environment Agency to verify this status after the event.

I see the "recovery" vs. "disposal" is a material planning consideration which has failed to be addressed by the WSCC planning report.

# ii) Importing Waste from across SE England

Another point of concern for residents is the need to bring in 230,000 tonnes of C & I waste per annum 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 worth 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 afield 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.

### iii) Air Quality Measures

There is insufficient consideration given to air quality and the evidence put forward by the applicant. It has been noted by expert opinion that key calculations are wrong and in-particular for C02 and NO2. The calculations which suggest a lowering of carbon in comparison with landfill are seen as inaccurate by virtue of their calculations being incorrect by a magnitude of 1000x. The correct calculation, based on government guidelines, suggests this incinerator is worse than landfilling. The NO2 calculations again are seen as incorrect. 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. 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 being one such area. HDC has also indicated that it retains reservations over the impact of the proposed facility in terms of air quality.

An air quality monitoring station should be installed to monitor air quality prior to any permission to develop any incinerator

### 4) Pollution

- a) On the current waste site we already have 4 x forms of pollution from:-
  - The Brickworks
  - Biffa WSCC Waste Operations (Mechanical & Biological Treatment Plant)
  - Landfill gases
  - HGV movements

This means that the area already has a cumulative level of emissions well above a zero base line coming from these sources and to this must now be added the new emissions from the incinerator

b) We know that road vehicles account for 80% of NOX at the roadside. We also know the North Horsham roads already have severe congestion and getting worse, with constant stop/start road motions leading to pollution hot spots. To this would be added more HGVs coming to the new incinerator from across SE England in order to supply a continuous source of Commercial and Industrial Waste in order to satisfy the requirements to keep the incinerator burning.

This beast will not be conforming to the proximity rule whereby the disposal of waste is made as close as possible to its source. Here waste will need to come in from all points of the compass to keep the fires burning 24/7.

Currently BCR are only using about 37% of the approved HGV allowance of 284 HGV movements per day. This incinerator will therefore see a massive increase in HGVs to this level at a time when the Government has set new standards about vehicle pollution in diesel engines.

Surely this is the right time for a thorough review of the safety of this level of HGV movement and the added pollution this will bring to this area of Horsham. This level of HGV activity was approved 5 years ago and thinking has moved on substantially since then.

Since this application NICE (The Health Watchdog) has reported that pollution should be addressed at the planning stage and urged Councils to use the planning system to cut people's exposure to polluted air, which is linked to a list of health problems including asthma attacks, reduced lung functions which will require expensive remedial action further down the line.

### 5) The Incinerator will impact on the character and distinctiveness of the area

The incinerator building is out of all proportion to the proposed site, which is too small, and the environs in which it will be sited.

At 170m x 107m and 12 stories or 36m tall and with a chimney stack 95m high with an added emission plume plus aviation lights these structures will be visible from a large number of beautiful viewpoints.

HDC have commented:

- that the height of the chimney stack in particular remains a concern and will be seen from afar. Not surprisingly, the additional representative viewpoints, only confirm that views of the stack will be generally available from close, medium and long range due to its height. The chimney stack would still be a significant physical feature in the landscape and wider countryside. They also indicate It is recognised that there will always be harm arising from the stack due to its size and impossibility to fully mitigate the effect of such a structure.
- Still has concerns about visual impact
- landscape impact and the potential impact on the North Horsham development

The design, height, scale and overall massing of this development will result in an unacceptable adverse impact on the wider landscape and character of the area.

It is not sympathetic with the landscape, open spaces, the skyline, which will be denuded of leaves for 6 months of each year, important rural views together with new ongoing night time light pollution.

WSCC Landscape Architect has commented that:

The scale of the proposed development is such that mitigation measures to screen the development only has limited effect

and Mole Valley said that:

'the sheer size of the facility means it would be visible from a wide range of surrounding viewpoints particularly the chimney stack.

Given the extensive visual impact of the development we asked that WSCC should undertake an independent landscape assessment to gauge the potential effect on the nationally significant landscape and the character of the rural area. This was not taken up.

This building is like having a gargantuan form of a Titanic x 3 dropping anchor in the middle of our rural community.

How this unwelcome guest that is totally out of keeping with its surroundings is now considered acceptable in terms of its impact on landscape and visual amenity is a complete mystery to everyone in the Horsham area.

# 6) 3 years of disruption to build then 30 years of burning

The incinerator, if built, will impact for 3 years in the lives of local people. Traffic disruption, noise dust. Little let up for them over this period with a further disruption to their lifestyles.

Then when built it will be with us for at least 30 years and no matter how they try and camouflage or reshape this colossus of a building it is still just an ugly oversized incinerator that does not fit onto its site nor in scale or tune with the local surroundings.

## 7) Ad Hoc Planning for Incinerators

There is a great danger that in leaving the way planning approvals for incinerators are dealt with on the current ad hoc basis, to market forces, that we will see the unintended consequences of an overcapacity for burning of waste happening rather than incentivising waste companies to invest in recycling technology. What we do not want is an overcapacity of burning, lack of investment in recycling and being stuck with huge ugly buildings, like this proposal, that we find out too late have no purpose but for commercial reasons, having £150m investment, are hungry to keep burning waste into the 050s and beyond. No doubt as signalled by the Government recently we will need a new incineration tax on waste to stop burning and make recycling the way for all to go.

# 8) Disruption to residents daily lives

Local residents raised many concerns in their objections to the WSCC Planning Committee about the impact this development could have on their day to day lives and those of so many families.

Concerns about the risks of pollution and long term health

 Should the scheme proceed residents will see more HGV movements during construction and then once complete a continuous HGV activity: Some mitigation in the reduction in operating hours (WSCC Planning Report Appendix 1 Para 14 & 16) were suggested such as:

7.30 am to 18.00 Mon to Fri

- 8.00 am to 12 noon Saturdays and no Sundays or Bank Holiday operation If the scheme were to go ahead then this could be effective for the construction period and then operational hours of use.
- Increase in noise at weekend and evening when families should be able to enjoy their leisure time without disruption. Some residents in Station Road Warnham live only 200m from the proposed incinerator site
- Light pollution from 24hr operation High Weald Joint Advisory Committee requested that external lighting is controlled through conditions
- Risks arising from fire at the plant and transportation of waste such as incinerator bottom ash onto our local roads.

Public Health England make it explicit that the planning authority should:

- ensure that the applicant has plans in place to undertake air quality dispersion modelling to assess a larger number of receptors
- confirm that on-site procedures are sufficient to prevent any off-site emissions of incinerator bottom ash particles
- should consider the need for the applicant to develop an accident management plan
- identifies all the potential hazards in relation to all of the proposed operations
- assesses the risk associated with the hazards (e.g. fire) (including an assessment of the potential impact on human health, e.g. on local residents); and Identifies the measures to prevent or mitigate the risks.

All these safeguards should all be in place before any permission is granted.

### 9) Conclusion

With the new application last year to WSCC very little changed since the recommended rejection last time.

It is not considered acceptable for:

- Visual Impact on the landscape It will be visible from a large number of viewpoints. The Incinerator will impact on the character and distinctiveness of the area.
- Out of keeping with the surroundings 170m x 107m x 36m high building plus 95m chimney stack
- There is clear guidance on what can be claimed to be recovery versus disposal as set out in the EU Directive 2008/98/EC, the Waste Framework Directive. This application cannot meet that criteria of 65% efficiency to meet the R1 status (as it will be in the region of 25%). It should instead be classed as D10- disposal in line with landfilling and the lowest part of the waste hierarchy.

- Importing Waste from across SE England into Horsham with increased HGV activity across SE England
- Key calculations for air quality are wrong in-particular for CO2 and NO2 and new guidance has now been received on air pollution and its impact.
- The impact on 2750 new homes and a school in the North Horsham Development
- Increased Noise for residents and light pollution
- Cumulative pollution levels
- Lack of recycling

This development is the wrong technology in the wrong place squeezed onto too small a site. Therefore, I ask Planning Inspector to reject this appeal.

# Local people believe the benefits do not outweigh the local and environmental impact.

This development if approved will impact on many generations of people in Horsham over the next 30 years. It will negatively impact now on the lives of thousands of residents in North Horsham so please turn down this appeal and support the residents very real and cogently argued opposition to this development.

Peter Catchpole WS County Councillor Holbrook Northlands House Northlands Road Horsham RH125PW West Sussex 1st March 2019 For official use only (date received): 17/01/2019 17:38:52

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CAS	E
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR DAVID CHAPMAN
Address	2 Fieldend Horsham RH12 4GY
ABOUT YOUR COMME	NTS
In what capacity do you	wish to make representations on this case?
☐ Appellant☐ Agent	
<ul><li>✓ Interested Party / Per</li><li>☐ Land Owner</li></ul>	rson
☐ Rule 6 (6)	
What kind of representation are you making?	
☐ Final Comments ☐ Proof of Evidence	
□ Statement	
☐ Statement of Common Ground  ☑ Interested Party/Person Correspondence	
☐ Other	ion correspondence

I would like to comment regarding the appeal. I must encourage that great consideration is given to the very strong negative response from the public regarding this polluting and ill-conceived proposal. More is being discovered by the day in the field of the effects of air pollution on health, much coming too late to help those who have already had their health ruined by dirty air. Steps should be taken to reduce the pollution spread into our atmosphere, not errect new projects such as this.

For official use only (date received): 04/03/2019 23:52:50

# The Planning Inspectorate

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Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

# Name MR PIERS CHAPMAN Address 11 Station Road Warnham HORSHAM RH12 3SR

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
□ Appellant
□ Agent
☑ Interested Party / Person
□ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

#### Dear Sir/Madam,

I write to raise my concern regarding the appeal by Britaniacrest Recycling to overturn the previous refusal of planning consent by WSCC.

It is obvious that the proposed development, being of a substantial scale and a substantial producer of inherently dangerous bi-products, will have a significant impact on the community both locally and within the South East in general.

Having recently moved to Station Road, Warnham, my fiancé and I shall become some of the nearest residents to the proposed scheme, if it is to go ahead. The decision to move to the area was based on the rural feel to the location, all be it within a small distance of the Langhurstwood Road Brickworks. If this facility is to be approved, it will have a significant impact on our neighbourhood and quality of life.

#### Public Health

The concerns regarding impact on health are clear, not only from stack emissions but also the solid bi-products including extremely toxic residue collected in the flu filtration. Much like the car, as mankind we can only seek to minimise the impacts of emissions on our health, based on the best scientific knowledge available at the time. Time and time again, this has proven to be inadequate, for example it is now common knowledge that prevalence of diesel engines has been directly correlated with an increase in mortality from respiratory causes, despite not that long ago apparently they were part of the answer to climate change. In the case of this development, the extra traffic and associated emissions barely feature in the assessment. Instead, all analysis is based on if the effect of the flu emissions will be acceptable, i.e. based on current opinion not bad enough to outlaw.

Furthermore, it would appear, from the analysis contained in representations from various parties including Public Health England, that much of the appellants justification in terms of any potential impact on health is based on dubious analysis and potentially flawed statistical modelling. One has to question if these assessments are valid, and furthermore if a planning application should be approved based on them when the potential consequences to health, the environment etc are so extreme. As asthma and allergy sufferers, we are very concerned about the potential negative impact on our health the proposal may have, both during construction and operation.

#### Visual Impact

Whilst the approx. 26.5m tall chimney of the brickworks is clearly visible from within our house and garden being amongst the tallest objects on the near horizon looking North East, its impact on the skyline is not significant. We also understand that the functional life of this facility may be coming to an a close, and as such the existing chimney may be removed. However, it is clear that the proposed building, which alone exceeds this height, would become a dominant feature of the skyline, visible above all other trees and substantially higher than all other buildings in the area. In addition to this, the c.95m tall chimney for the proposed incinerator would tower above us. The accompanying illumination to aid visibility to aircraft will ensure that even at night it cannot be ignored, and further impacting on the rural location by adding light pollution.

Others have already noted that this building will be visible from across the South East, including areas of outstanding natural beauty. I feel it is critical that the wider negative economic impacts this development may have are considered including reduction in tourism, reduction in desirability as a location for employers etc etc.

#### Noise Pollution

It has been identified that a significant increase in the level of background noise is expected as a result of the proposal. For those of us who are nearest residents, this will likely have a significant impact on our quality of life. The constrained site mean that mitigation of this concern is not likely, and equally

that nearby residents will experience noise levels similar to if we were living within a substantial industrial facility, operating 24/7.

#### Highways

It is unquestionable that the proposed facility would result in an increase in traffic locally. The A24 is a very busy and known to be dangerous road. The junction at the end of Station road is testament to this fact, where at the best of times it is difficult to negotiate. Congestion on the A264 and A24 is already widespread, and the junction between A264 and Langhurstwood Road woefully inadequate even for current use. Given the large number of lorry movements a facility of this scale will result in, it seems sensible that if it is to go ahead further measures would be necessary to mitigate any unnecessary increase in risk and congestion.

I have only recently become aware that WSCC only seek to defend their decision on the grounds that the development would have an unacceptable impact on the landscape and visual amenity. Whilst doubtless this is the case, it appears that all other reasons have been discounted on the basis of an extant planning consent for a totally different facility on the same site. Much of the detail is beyond my knowledge, however, many of the points discounted remain pertinent to the situation under consideration, as I have outlined above.

Further to this, I feel it is critical that the broader picture is adequately considered in making a decision of this significance. As a society, should we be allowing the construction of incinerators for our waste? Especially at a time when the clearly superior solution and unstoppable direction is reduce, re-use, recycle – as I was taught at primary school some quarter of a century ago. Recent precedence for refusal has been set following a spotlight being shone on the dubious environmental credentials of such schemes. As such, I would call on the planning inspector to consider the wider consequences for civilisation should they chose to approve the scheme.

To close, I hope that the planning inspector will dismiss the appeal at time when humanity should be pulling in another direction and that as a result my neighbourhood shall remain a pleasant, rural place to live, and the wider area an ongoing commercial success.

Kind Regards, Piers Chapman From: Cherie Reeve

**Sent:** 04 March 2019 16:56

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965 - OBJECTION

> I hereby object to Appeal Reference APP/P3800/W/18/3218965 for a incinerator facility at Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

> Allowing this development to take place will be a disaster for Horsham and surrounding areas. The visual, environmental, and health impact of such a development is unacceptable and not only will destroy the beauty and character of this part of Horsham forever, but will damage the local environment and health of our residents.

>

> This proposal is in no way compatible with the North Horsham development, which has already been granted planning permission, for up to 2,750 new homes, leisure facilities, and a mixed school for ages 4 to 18. An industrial incinerator of this type and size should be sited far from homes and schools where it will not impact the life, health and environment of local residents. As such this is not the right site for this facility and Britanniacrest should withdraw their application/appeal and look elsewhere.

>

> Furthermore as I'm sure you're aware this proposal does not meet West Sussex waste management plan and is purely intended as a money making business for Britanniacrest. At a time when we should be looking to reduce and recycle none renewable waste all levels of government and business should be looking to reduce use of single-use consumables. Burning such waste is not the answer! Reduction in use and increase in recycling is the only sustainable future.

>

> Please refuse this appeal and re-confirm your refusal of this planning application. Quite simply it is the wrong plan and the wrong site.

> Regards

Mrs Cherie Reeve 6 Hill Mead Horsham West Sussex Rh122pu For official use only (date received): 04/03/2019 15:18:20

# The Planning Inspectorate

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Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MRS P CHATHAM
Address	18 Brambling Road HORSHAM RH13 6AY
ABOUT YOUR COMME	NTS
In what capacity do you	wish to make representations on this case?
☐ Appellant	
☐ Agent ☑ Interested Party / Pe	rson
☐ Land Owner	
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What kind of representa	tion are you making?
☐ Final Comments	
<ul><li>☐ Proof of Evidence</li><li>☐ Statement</li></ul>	
☐ Statement of Commo	on Ground
☑ Interested Party/Pers	son Correspondence
□ Other	

I have been a resident of Horsham for over 22 years. I make my observation not as a NIMBY resident (not in my back yard) but as an intelligent professional who wishes to see reasonable and sustainable development. Yes I have made objections in a similar way to the North Horsham development because as I will list below, I believe the the local roads system is insufficient to take any further movements and maintain growth in local business and family live.

1) There is no need for an incinerator except for the applicants own business profit. and The roads are exponentially busier than they were when I started my work commute 22 years ago north bound on the A24.

We already have a landfill site and the roads already hold many movements of lorries from outside the county. This is transporting waste from communities who have less access to good quality recycling facilities and shows the imbalance in council priorities across Surrey and the rest of the South East. This area has a high recycling rate. If future legislation makes this compulsory, then less waste will go to landfill or incinerator. I believe that an increase in vehicle movements will hinder the growth of business in the Horsham area as business move premises even nearer the A23 corridor to avoid long queues. The A24 is insufficient north or south bound for the current volume of traffic especially HGV's of the size used in this type of establishment.

In addition the government has already stated this oversupply of incinerator capacity.

#### Incineration Overcapacity

Early Day Motion #581 Tabled 22 November 2017 for debate in the House of Commons

#### MORATORIUM ON NEW WASTE INCINERATION CAPACITY

That this House notes 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; further notes that incineration overcapacity can be a barrier to achieving the recycling society; believes that realising such a recycling society would result in significant economic, social and environmental benefits; acknowledges 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, covering both conventional waste incineration and other forms such as gasification and pyrolysis, as a matter of urgency. https://edm.parliament.uk/early-day-motion/51049

2) I like living in a more rural area. I like clean air.

As I drive south down the A24 . I can now see the hills of rubbish accumulating in the land fill site. At least these will eventually be landscaped and there will be a closure as it is full. There will be no cessation to the incinerator on the proposed plot. The chimney will tower over the districts natural heritage and remind us every rural walk that we have failed to curb mans excesses. Parts of the proposed plot it will be visible even in part all across the north of the district. It will no doubt be visible from the north and South downs. I will leave the experts to make comment on the destruction of habits and clean air which has been well documented and again challenged by a multi national who no doubt believe that they won't do any harm to the thousands of residents who will live below their chimney.

I wish I had won the lottery and and could employ a mass of workers to assist the fight against this application which should not progress for all of the reasons that West Sussex County Council have already listed. The planners had little choice but to allow the housing under current dilution of planning laws and now we wish to poison the families who will be living there.

Yours sincerely an average and caring member of the Horsham Community.

# Jane Moseley

**Recycling impact** 

From: Sent: To: Subject:	Steve 18 February 2019 10:34 helen.skinner@pins.gsi.gov.uk : Incinerator Appeal at the former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex County Council's planning register (reference WSCC/015/18/NH)
Sent by Email: <u>helen.skinner@pin</u>	<u>s.gsi.gov.uk</u>
Helen Skinner,	
The Planning Inspectorate,	
Room 3/J, Temple Quay House,	
2 The Square,	
Bristol BS1 6PN	
Dear Ms Skinner	
Re: Incinerator Appeal at the form County Council's planning registe	er Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex r (reference WSCC/015/18/NH)
We would like to strongly objec	t to the proposed incinerator for the following reasons:
Visual Impact	
is 26.5m high and bigger than Ho	is 35.92m high. This is significantly taller than the chimney of the brickworks which sham's shopping center, Swan Walk. It will be an eyesore visible from a large area ural beauty. The site is simply too small and the area inappropriate for what is
Light Pollution	
	iddle and top of the stack is lit at night due to the proximity of flight paths. In raft, such comprehensive lighting will create significant light pollution detrimental to ne.

WSCC have invested heavily in the Biffa bio-mechanical digester to deal with household waste which is likely to	
become underutilized should the incinerator be built. Given that the proposer has stated that they intend to burn bla	ck
sack waste as well as industrial waste it is also likely that recycling will drop, as has been the case in London.	

#### **Noise Pollution**

As the site will operate on a 24/7 basis it will create noise above the low levels of ambient noise enjoyed by rural areas, especially at night.

#### **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 pollution to our rural doorsteps. This proposal would bring additional lorries on the dangerous A24, congested A264, A29, M23 as waste is imported into Horsham to burn.

#### WSCC waste plan

The incinerator proposals do not 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.....

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.
Yours
Steve and Karen Chilver

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

From: Chris Noakes

**Sent:** 18 January 2019 19:09

**To:** Skinner, Helen

**Subject:** (APP/P3800/W/18/3218965)

Hi Helen.

I wish to add my concerns to the application appeal to the incinerator in Horsham.

In this day and age when we, as households, are being pressured to recycle more and more, this solution goes against everything this country and county has been working towards.

The planners and people involved in this are probably all over the age to really give a damn further down the line as there lives are done. They can move off and retire or relocate. Yet our children, of which I have two, are the future and will no doubt be unable to comprehend any decision in favour of this. They are being taught in schools to recycle, reduce waste and global warming is caused by.....burning waste that gives off poisonous and harmful gasses. If HDC and the government allows this to go through then we are effectively saying we dont care and our kids futures are worthless. Also that recycling is a joke and we can't be bothered to look for better ways that are not this!!!

There has to be a better way. We are not a third world country, as we have the skills, knowledge and ability to find a cleaner and safer solution. One that says we do care. And why Horsham!?!

Should this go through the message it sends out to me and others is don't bother to recycle as we just burn it. Why should I sort, clean and proactively look to buy recyclable products. It also tells me to move out, whilst the house price is high, as once it's up and running then house prices will drop. Who wants to live under a chimney that can be seen from miles around pumping poison out of it into the lungs of my family?

I would be grateful if you could raise this with whoever is concerned

Thanks

Chris Noakes 56 Primrose Copse From: Christine Velarde
Sent: 04 March 2019 21:28

To:Helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

Quoting Ref: APP/P3800/W/18/3218965

I wish to register my objection to the planned incinerator.

- Increased pollution across Horsham putting lives of ourselves and our children at risk
- Doesn't help to meet counties recycling targets
- Light pollution from the air traffic lighting on the chimney
- Increased pollution from heavy vehicles transporting waste to the incinerator 24/7
- Increased damage to the county's highways system requiring more money from taxpayers to repair
- The incinerator hinders WSCC/HDC's plans, it doesn't help them.

Best regards, Christine Velarde RH13 9DR From: Gray and Claire
Sent: 04 March 2019 23:26

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

Dear Ms Skinner,

I sent a long email objecting to the proposed Incinerator last year, but would like to add one more objection please.

The location of the proposed Incinerator is **so** close to the new Bohunt Free School site (from 2020).

The quality of the air is therefore of *even more* concern that it was before, plus the additional traffic could make it *even more* dangerous for children from Horsham (south of A264) getting to the school.

I feel very strongly that building and operating the proposed Incinerator will be of great detriment to Horsham and the surrounding areas and the people that live here.

Yours sincerely, Claire Saich

3 Downsview Road Horsham RH12 4PF For official use only (date received): 03/03/2019 15:11:47

# The Planning Inspectorate

#### COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CA	SE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR MICHAEL CLARK
Address	Park House Sedgwick Park HORSHAM RH13 6QQ
ABOUT YOUR COMMI	ENTS
In what capacity do you	u wish to make representations on this case?
☐ Appellant	

In what capacity do you wish to make representations on this case?

□ Appellant
□ Agent
□ Interested Party / Person
□ Land Owner
□ Rule 6 (6)

What kind of representation are you making?
□ Final Comments
□ Proof of Evidence
□ Statement
□ Statement
□ Statement of Common Ground
□ Interested Party/Person Correspondence
□ Other

I strongly object to the Horsham Incinerator for several reasons. The fall out from the chimney will cover a populated area and cause health problems for those affected. The traffic congestion and pollution from the many thousands of vehicle movements will be added to the already increasing amount of traffic from the massive house and industrial unit building programme currently underway in and around Horsham. If the incinerator is built it will need to be kept fed with waste, thereby reducing the amount of future recycling possible. The size of the structure, especially the 95m chimney, will be an eyesore on the landscape. The CO2 emissions will be considerable (1 ton of CO2 per ton of waste) at a time when all efforts are being made to reduce them, such as the Government led switch to electric vehicles, building of wind farms, banning the installation of gas cookers, etc.

#### Jane Moseley

From: ann Collins

**Sent:** 01 February 2019 09:18

**To:** Skinner, Helen

**Subject:** Ref(APP/P3800/W/18/3218965)

With reference to Appeal against the proposed application for a Recycling Recovery and Renewable Energy Facility, we wish to add to our previous objections that we most strongly disagree with this application for the following reasons.

- 1) It is to be built too near to a major conurbation particularly the new housing proposed nearby. These houses are more urgently needed than a recycling facility.
- 2) It will add to the already polluted air present here in Horsham. Horsham is already far heavily polluted due to the fact that it is situated in a bowl shape. Although the applicants state that it is only water vapour will be coming out of the chimney, anyone knows that chemicals can easily be found in water vapour, and will be dissolved as the vapour passes through the chimney.
- 3) The increased presence of heavy lorries on country lanes and roads leading up to the new facility will be catastrophic for the new housing and increase the pollution again. It is proposed that many children will be in this new development as there is a school planned. What a bad effect this facility is going to have on their health.
- 4) Most of the increased traffic will be from non-English firms, or from surrounding councils etc which will be of no benefit to the occupants of Horsham.
- 5) Since moving here from the country we have noticed increased problems with our nasal allergies, due to increased pollution, already. Thus pointing to the fact of over pollution here. Yours faithfully

Mr John M and Mrs Ann J Collins, 8, Fivens Place, Horsham, West Sussex Rh125as

Sent from my iPad

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CA	ASE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

# Name MR DAVID CORNFIELD Address Pemberley Pondtail Drive HORSHAM RH12 5HY

#### Dear Sir/Madam

I am writing to you to raise my deep concerns and objections to the proposed incinerator at North Horsham. I am very distressed that this case has been taken to appeal. 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 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.

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. The Government is already beginning to consider compelling evidence that there is over-capacity of waste incineration in the UK. The experience of similar facilities in 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 and try to put yourself in the shoes of the people that will be most impacted by this unnecessary and damaging proposal.

Yours sincerely

Mr and Mrs Cornfield

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CAS	SE CONTRACTOR OF THE CONTRACTO
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349

# Name MRS VALERIE CRAEN Address 54 Kempshott Road Horsham Horsham West Sussex RH12 2EY

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence

□ Other			

This is too close to houses currently there and houses to be built. We should also be looking at recycling more not burning our rubbish. This site would be a hazard to the local community, and have a negative impact on the recycling effort.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MRS YOTA CROUCH		
Address	2 Park Farm Close HORSHAM RH12 5EU		
ABOUT YOUR COMME	NTS		
In what capacity do you wish to make representations on this case?			
☐ Appellant			
☐ Agent ☑ Interested Party / Person			
□ Land Owner			
□ Rule 6 (6)			
What kind of representation are you making?			
☐ Final Comments ☐ Proof of Evidence			
□ Statement			
☐ Statement of Common Ground			
<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>			
- Other			

I strongly object go the building of the incinerator. The reasons that it was originally refused by WSCC still are valid.

- . The incinerator is sited in very close proximity to a large proposed development including homes and schools.
- . Whilst there is no request to increase permitted amount of vehicle movements to the site, currently only half of the permitted movements are used so in reality the actual amount will double.
- . The incinerator does not meet the wscc sustainability plan
- . The incinerator is for trade waste and will bring in waste from various counties in SE England not just Sussex.
- . The incinerator will be out of proportion with other buildings in and around horsham and will be a blot in the landscape.
- . The solution to reducing landfill is in increased recycling and less waste Rodutiin not burning waste. This already a trend which if continued will render the need for an incinerator obsolete.

For these reasons I believe that the appeal be dismissed.

Regards, Yota Crouch

#### Jane Moseley

From: Malcolm and Joy Curtis
Sent: 25 January 2019 12:00

**To:** Skinner, Helen

**Subject:** Appeal Reference APP/P3800/W/18/3218965

#### Good day Helen

My wife and I are writing with reference to the Appeal in the Subject Line. We wish to register our objection based upon the following:

With the continuous building projects in Horsham the roads are becoming busier all the time. With the volume of traffic comes the deterioration of road surfaces. We can ill afford the additional heavy lorries that will be using our local roads in order to get to the site as these will only make the roads worse.

Surely the planned building of 2750 homes in North Horsham will be affected by the smells coming from this plant, not to mention the residents already situated in the area close to the proposed site.

Horsham has been forced to build a large number of houses because of the decision taken by the Government Inspector, surely it is time to draw a line and turn down the request as this is clearly not wanted by the population of Horsham.

With Kind regards

Mr and Mrs M Curtis Nymans Close RH12 5JR

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# **Jane Moseley**

0303 444 5531

From: To: Subject:	Skinner, Helen Re: RE: APP/P3800/W/18/3218965 incinerator objection
Sorry i though i signed, used to	work email that signs itself. Eleonora Dal Mas
Sent from Libero Mail for iOS	
Friday, 1 March 2019, 12:52 + < <u>HELEN.SKINNER@plannin</u>	0000 from <a href="mailto:HELEN.SKINNER@planninginspectorate.gov.uk">HELEN.SKINNER@planninginspectorate.gov.uk</a> ginspectorate.gov.uk>:
Thanks you for your email. Un your comments to be consider	nfortunately I cannot accept anonymous representations. If you would like ed, please supply your name.
Regards	
Helen	
Helen Skinner	
The Planning Inspectorate	
Major Casework	
3/J Kite Wing	
Temple Quay House	
2 The Square	
Temple Quay	
Bristol	
BS1 6PN	

# Please note ny new email address: helen.skinner@planninginspectorate.gov.uk From: **Sent:** 01 March 2019 12:02 To: helen.skinner@pins.gsi.gov.uk Subject: APP/P3800/W/18/3218965 incinerator objection APP/P3800/W/18/3218965 I come from another country (Italy) where my grandfather is the president of a really successful waste recicling company that has won awards nationwide for the impact of good recicling on the amount of waste. I dont think an incinerator will solve the problem of waste in horsham, that is clearly connected to a less than perfect recicling scheme. Im sure there are many more suitable improvements for this problem. "The climate change impacts of incineration are worse than landfill. Most of what is incinerated could and should be recycled or composted." Thank you for the attention, have a lovely day

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR BENJAMIN DALE	
Address	23 Keats Close HORSHAM RH12 5PL	
ABOUT YOUR COMME	:NTS	
In what capacity do you wish to make representations on this case?		
□ Appellant		
☐ Agent  ✓ Interested Party / Person		
☐ Land Owner		
Rule 6 (6) What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence		
☐ Statement ☐ Statement of Common Ground		
<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>		
Li Ottlei		

I am astounded and deeply saddened that this matter is being appealed. Having such a hideous and disgusting eyesore on our beautiful landscape would be a tragedy for all Horsham residents; present and future, and the proposed facility would only have a detrimental effect on all living in the locality. I am shocked to see that the council are no long upholding the majority of the reasons for the rejection of the previous application. I would appeal to the consciences of those who hold this decision in their hands and plead that they do not grant this application on appeal.

For official use only (date received): 14/02/2019 20:47:00

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS SARAH DALE	
Address	23 Keats Close HORSHAM RH12 5PL	
ABOUT YOUR COMME	NTS	
In what capacity do you wish to make representations on this case?		
<ul> <li>□ Appellant</li> <li>□ Agent</li> <li>☑ Interested Party / Person</li> </ul>		
□ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
<ul><li>□ Final Comments</li><li>□ Proof of Evidence</li><li>□ Statement</li></ul>		
<ul><li>□ Statement of Common Ground</li><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>		

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From: mcdxcom Unknown
Sent: 03 March 2019 21:35

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** APP/P3800/W/18/3218965 incinerator

#### **Daniel Stevens**

I object to the incinerator being built. The location is not suitable due to residents and health impacts (noise, lights, vibration, air & visual impacts).

Therefore this build should not be allowed to go ahead.

**Daniel Stevens** 

Rh12 4jb

86 littlehaven lane

FAO: Helen Skinner The Planning Inspectorate Room 3/J Temple Quay House 2 The Square Bristol BS1 6PN

21st February 2019

Dear Madam

#### Application Ref: APP / P3800 / W / 18 / 3218965

We wish to express our support for this application. This development and others like it are, in our opinion, desperately needed. It is a fact that we cannot continue to bury rubbish in landfills. Recycling as far as it goes, is a good idea. We all know about saving the Earths resources and aiming for carbon neutrality however, to take the residue which cannot be recycled and generate electricity cleanly and safely is the future.

The demand for electricity will only rise as the years continue, just the fact that we are all being encouraged to have electric vehicles, will stretch an already struggling electricity infrastructure. So, to be able to generate electricity, reduce the reliance on landfill and not export waste vast distances across Europe is, without doubt, the sensible option.

The applicant is one of the leading waste disposal companies in the Country, well respected in the local area, a large caring employer and with a vast knowledge of their trade and has, in my opinion, moved heaven and earth to make this development fit into the landscape.

Please pass this application for the good of the greater community.

Yours faithfully



D W French Managing Director

Skip & Grab Hire • Waste Disposal • Recycling Centre • Haulage • Commercial Vehicle Workshop

From: David Rann

**Sent:** 17 January 2019 16:45

**To:** Skinner, Helen

**Subject:** APP/P3800/W/18/3218965

I have already put my objection to this, but in case they are missing, I will give them again.

I know that with all the plastic etc that is used, it has too be dealt with, but surely the government of the day should insists that all packaging is able to be recycled.

When you look at the plans that Horsham has for the area, they want to build a large housing estate, plus a school right next to the incinerator, let alone Horsham right on its door step. We are told that the chimney will be so high that no full out(smoke) will effect the local area, maybe, that is until mother nature takes a turn and decided to intervene and then it will be too late. I saw the devastation after the Hurricane passed through, yes it was a once off, but can you imagine a very high wind would have with what comes out?

I will say no more, it is in the wrong place. David Rann

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR RUSSELL DAVIS	
Address	20 Kestrel Close Horsham Horsham West Sussex RH12 5WD	
ABOUT YOUR COMM	1ENTS	
☐ Appellant ☐ Agent ☑ Interested Party / I ☐ Land Owner ☐ Rule 6 (6) What kind of represen	ou wish to make representations on this case?  Person  tation are you making?	
☐ Final Comments ☐ Proof of Evidence		
☐ Statement		

☐ Statement of Common Ground

<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>
YOUR COMMENTS ON THE CASE
Dear Sirs.  I believe that this facility should not be placed in the designated site. The impact it will have on the local environment is massive, both in pollution and the extra traffic movements.  The town is growing too fast with all the new developments and the road systems and infrastructure will come under too much pressure,
More recycling and advertising to the population of how to reduce waste materials should be considered.
Thank you

From: Pope, Dawn

Sent: To:

**Subject:** APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road,

**Attachments:** Existing chimney from middle of Station Road.jpg; Existing chimney from my house

in Station Road.jpg

To the Planning Inspector,

Re: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

As a local resident who lives within a few hundred meters of this proposed incinerator, I am absolutely dismayed that this application is being appealed.

The design, height, size and mass of the proposed building will have a severe, lasting and totally detrimental effect on the local landscape. It is unsightly and entirely out of keeping with area and will irreparably harm the life that residents in the vicinity currently enjoy. The proposed buildings are significantly higher than anything in the surrounding area and damage the distinctiveness of our market town.

The building height is still planned to be some 36 metres high, that is 12 storeys, and shoehorns the oversized building onto a small site. This will be out of keeping with anything else in Horsham and will indeed set a precedent for future planning applications. The 95m chimney cannot be mitigated and no details have been provided as to its design.

I have attached 2 photos taken of the existing site chimney from Station Road. As you can see, the existing chimney is clearly visible above the treeline. The existing chimney is 27 meters high. As the new proposed building will be 35.9 meters high it will dominate the landscape and be a huge looming monstrosity above the treeline. The new chimney will be approximately 95 meters high. What trees are Brittaniacrest going to plant to hide this site? Giant Redwoods?

Consultees have pointed out applicant mathematical errors, mainly for carbon dioxide and NOX. How can the Committee assess whether this development meets local and national plans and policies in relation to carbon emissions, air quality and climate change if the accuracy of the data is questionable? This has implications on health and cannot be left unanswered, and this is the responsibility of the Committee and not the Environment Agency

The role of government must be to protect and improve the health and wellbeing of its citizens. If any of its decisions threatens to worsen the quality of its air, water or soil through further toxic emissions or pollutants, councillors and officers will have failed in their duty.

In the last few months, we have learned that we only have 12 years to reverse the damage that we are doing to our planet. Globally, people are demanding less plastics be used, more recycling, reduction of single use plastics, school children are striking to highlight the need to take action now to protect our planet.

For Horsham to be considering an incinerator is an insult and feels like we are going backwards not forwards.

Please do everything you can to stop this on behalf of the residents of Horsham.

Kind regards, Dawn Pope





### Jane Moseley

From: Bob Day

**Sent:** 18 February 2019 19:02 **To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Fw: Appeal, Planning Ref. WSCC/015/18/NH - Incinerator at Langhurstwood Lane,

Horsham, RH12 4QD.

Re. Appeal, Planning Ref. WSCC/015/18/NH – Incinerator Plant, Langhurstwood Road, Horsham, RH12 4QD.

Dear Ms. Skinner,

I am resending my objection to the above Planning Application as in the earlier response I had not given my and my wife's address. Would you please delete the original email and substitute this revised objection.

Many thanks.

Yours sincerely, Robert Day.

From:

Sent: Monday, February 18, 2019 5:51 PM

To: helen.skinner@pins.gsi.gov.uk

Subject: Appeal, Planning Ref. WSCC/015/18/NH - Incinerator at Langhurstwood Lane, Horsham, RH12 4QD.

Dear Ms. Skinner,

Re. Appeal, Planning Ref. WSCC/015/18/NH – Incinerator Plant, Langhurstwood Road, Horsham, RH12 4QD.

We wish to object, in the strongest terms, to the proposed Britaniacrest Incinerator Plant and cite the following in support of our objection.

### Visual Repercussions.

The site is situated in a rural area of great natural beauty, abundant with wildlife, which will be impacted adversely by an incinerator building of vast plan area and some 36 metres in height and a chimney rising to some 27 metres. Such a massive structure will be visible from miles around and dominate the local countryside and be an eyesore for miles around.

### Light Pollution.

The top of the structure and stack are required by the CAA to be fitted with bright warning lights at night so as to be visible to low flying commercial jet aircraft pilots as a it is situated under Gatwick Airport final approach and departure flight paths. Gatwick airport is only some five miles distant. This will be visible over a great distance adding to the visual impact on the surrounding area, particularly at night.

#### Alternative Better Methods of Waste Management.

The publicly funded Biffa bio-mechanical digester will be affected greatly as the incinerator will be used to dispose of household as well as industrial waste; in fact it may cease to operate owing to competition for waste to process. Also, the amount of household waste being recycled is steadily increasing in the County which may suffer when the inexhaustible demand for combustible waste by the incinerator may well

impinge on waste sent for recycling. Both these two alternatives are less polluting to air quality which is already deteriorating.

#### Justification of Need.

An incinerator plant, to be sited in Ford, has already been granted planning permission. it is situated well inside the West Sussex boundaries and is most likely to process waste from within the County. The proposed incinerator at Langhurst is situated very close to the County border with Surrey and is very likely to process a large proportion of waste from outside West Sussex. West Sussex residents will be required to suffer the traffic congestion and pollution therefrom and the pollution from the incinerator exhaust fumes so that Surrey can meet its waste processing targets.

### Noise and Disruption.

The operation of the incinerator will be constant 24 hours per day, 7 days per week and 365 weeks per year. The noise and disturbance from these operations, including waste material supply, residue removal and the activity associated with the burning process will be deeply upsetting for local residents for miles around. The noise will be more noticeable at night when ambient noise is reduced to almost complete silence in this rural area bar the sounds of nocturnal wildlife.

### Proposed Chimney Stack.

The chimney stack as proposed is significantly shorter than those of similar sized incinerator plants. it is, therefore, likely that this will be substantially increased in height in the final planning negotiations.

#### Air Quality.

Air quality is declining in West Sussex, particularly in the north of the county, owing to road congestion, largely from commercial vehicles, as traffic flows rise inexorably exacerbated by use being made of unsuitable country lanes by unsuitable vehicles to avoid traffic queues on the major roads. Exhaust pollutants are already damaging health in the congestion hot-spots and in the wider countryside. Additional industrial lorries will only add to this unsatisfactory situation, the majority of which will be diesel powered. The fumes from the incineration process, even if the chimney is sufficiently high to keep it above immediate local residents, will add to the degeneration of air quality in the County.

#### Incompatibility with WSCC Waste Plan.

Strategic Objectives 5. Waste treatment to be carried out as close as possible to where waste is produced. Strategic Objective 10. Protect and enhance natural and historic environment and resources in the County. Policy W11: Character. Not unacceptably impact character, distinctiveness and sense of place of an area. Policy W12: High Quality Developments. To be of appropriate scale, form and design having regard for the local area.

Evidently, these requirements have not been met by this proposed unsightly incinerator plant.

We most strongly object to this proposal and would ask you to reject the Appeal.

Yours sincerely,

Robert and Marianne Day.

Garmans, Marches Road, Warnham, Horsham, West Sussex, RH12 3SL

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### The Planning Inspectorate

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DETAILS OF THE CAS	E
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MS PAULA DE GOUVEIA
Address	33 Horsham RH12 5FW
ABOUT YOUR COMME	NTS
In what capacity do you	wish to make representations on this case?
☐ Appellant☐ Agent	
✓ Interested Party / Per	rson
☐ Land Owner	
Rule 6 (6)	tion are you making?
What kind of representation of Final Comments	uon are you making:
☐ Proof of Evidence	
☐ Statement☐ Statement of Commo	on Ground
✓ Interested Party/Pers	
□ Other	

I am opposed to the opening of the incinerator plant as per the original 6 reasons for refusing planning permission. Health and local congestion on the roads being of most concern.

### **Jane Moseley**

From: Mark Dear

**Sent:** 22 February 2019 11:44

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

#### Dear Madam,

Please take this as my notification as a local resident to decline the above appeal.

My grounds are simple; It is all ready excessively large; it is lit at night; it is noisy at night and I have real pollution concerns.

Thank you for your consideration.

Sincerely Richard Dear Strood Place Strood Lane Warnham RH12 3PF



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Address

### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MRS CAROLINE DEBANSI

7 Station Road Warnham HORSHAM RH12 3SR

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☐ Interested Party / Person
☑ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
✓ Statement
☐ Statement of Common Ground
☐ Interested Party/Person Correspondence
□ Other

I am appalled and disgusted at the treachery the councillors are showing with regards to this case. Decisions are being based on mere assumptions. that the lack of a study for certain aspects means it is an irrelevant concern. Five reason which won the earlier rejection are being tossed aside, as equating no grounds for rejection. This is not untrue and it is also misleading and damaging. The council are failing in their duty and I believe it is a deliberate4 whitewash to pass the original plans that they wanted to pass but had to pay lip service to objections. This is not about the reasons for rejection. it is about Transparencey and moral and ethical duty which appears to be seriously lacking in WSCC. All the objections lodged are valid and while some cannot be proven true with out incuring costly studies they also cannot be proven untrue, Yet the councillor in charge of representing th objectors is self admittedly biased in favour of the applicant from the very beginning. The whole thing smacks of dirtiness.

From: Debbie Lighter
Sent: 03 March 2019 21:38

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal reference APP/P3800/W/18/3218965

#### Dear Ms skinner

I am writing to you regarding the above appeal lodged by Britanniacrest, who want to build an incinerator on the outskirts of our town.

I am totally opposed the the plans on all grounds, and feel that it would be detrimental to the health and well-being of my family. I have two small children who attend a village primary school a short distance for the prosed site and it will undoubtedly be affected by the pollution caused by burning rubbish so close to it. My daughter suffers from asthma and we chose the village school particularly to be away from busy roads. A fact that would be completely negated by an industrial unit pouring smoke into the region.

Furthermore, having lived in Horsham all my life, we recently moved out to the village of Broadbridge Heath because traffic gridlocks were so bad in getting out of the town in the morning. The increased hgv traffic caused by the site would make the roads around the outskirts of Horsham grind to halt. As I drive the same route everyday that they would take to get to it, I know that this would be the case, no matter what the 'traffic assessment' says. It already takes half an hour to go a few miles, how can the increase in traffic possibly not have a grid locking effect?

Furthermore I do not believe that the commercial burning of rubbish for sussex and the surrounding counties should be something that is done so close to a thriving market town, which is ever growing and promoted as suitable for families to settle in.

This is a terrible plan which would forever change the nature of our town, would make it a horrible place to live and be bad for out health. Please do not approve it, it should not happen here, or anywhere as we should be focusing on reducing rubbish not just burning it.

Please reject this plan, and protect the health and well-being of the people of horsham.

Deborah hughes 67 old Guildford Road Broadbridge Heath Horsham Rh12 3jy For official use only (date received): 03/03/2019 14:49:33

### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

SENDER DETAILS	
Name	DR NIGEL DENNIS
Address	44 Greenacres North Parade HORSHAM RH12 2TB
	KHIZ SIR

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
□ Appellant
□ Agent
☑ Interested Party / Person
□ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

I am the County Councillor for the Horsham Hurst electoral division and on behalf of my constituents, many of whom have strong views about this application, would like to raise objections on the six original grounds identified by West Sussex County Council. Namely, the need for the facility, the impact on the district's roads, concerns over public health, impact on residents, the combined impact with the north of Horsham development on residents, the impact on landscape and visual amenity. I am aware from local discussions that all of these issues are still very much considered to be detrimental to the locality. In addition, I would question the need for the facility as it will deter greater levels of recycling and reuse which are to be preferred from an environmental viewpoint. The County Council built a sophisticated mechanical-biological treatment plant to avoid the need for a waste to energy plant in West Sussex, which deals with the municipal waste. The same requirements should be made for disposal of commercial waste.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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DETAILS OF THE CAS	E	
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS JILL DINSDALE	
Address	7 Purton Road HORSHAM RH12 2HB	
ABOUT YOUR COMME	NTS	
	wish to make representations on this case?	
☐ Appellant☐ Agent		
✓ Interested Party / Per	rson	
□ Land Owner		
□ Rule 6 (6)		
What kind of representation are you making?  □ Final Comments		
☐ Proof of Evidence		
☐ Statement		
☐ Statement of Common Ground ☐ Interested Party/Person Correspondence		
☐ Other		

I am writing to strongly oppose the proposed incinerator in Horsham. In my opinion, an incinerator is not an answer to waste management. Surely there are other initiatives to reduce waste as opposed to taking the backward step of building an incinerator. I would hope the innovators amongst you would be able to come up with solutions that don't create even more pollution. As someone who suffers with asthma (two hospital admissions already this winter as a result) I'm appalled at the idea that an incinerator - something that will most certainly exacerbate my symptoms is even being contemplated. Please do the right thing and stop this in its tracks.

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS KAREN DOWN	
Address	26 Wagtail Close HORSHAM RH12 5HL	
ABOUT YOUR COMME	NTS	
In what capacity do you	wish to make representations on this case?	
<ul><li>□ Appellant</li><li>□ Agent</li><li>☑ Interested Party / Per</li></ul>	rson	
☐ Land Owner☐ Rule 6 (6)		
What kind of representat	tion are you making?	
☐ Final Comments ☐ Proof of Evidence ☐ Statement		
☐ Statement of Commo ✓ Interested Party/Pers ☐ Other		

It has not been demonstrated that the facility is needed to maintain net self-sufficiency to manage the transfer, recycling and treatment of waste generated within West Sussex. Therefore, the development is contrary to strategic objective 3 of the West Sussex Waste Local Plan 2014.

The development would have an unacceptable impact on landscape and the visual amenity of the area, contrary to policies W12 and W13 of the West Sussex Waste Local Plan 2014.

The development would have an unacceptable impact on highway capacity, contrary to Policies W10 and W18 of the West Sussex Waste Local Plan 2014.

The development would have an unacceptable impact on residential amenity, contrary to Policies W10 and W19 of the West Sussex Waste Local Plan 2014.

The development would have an unacceptable impact on public health, contrary to Policy W19 of the West Sussex Waste Local Plan 2014.

The development, along with other existing, allocated and permitted development, including the North of Horsham development, would result in adverse cumulative impacts, contrary to W10 and W21 of the West Sussex Waste Local Plan 2014.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

SENDER DETAILS	
Name	MR. CHRIS DRINKALL
Address	10 WHITE HORSE ROAD HORSHAM HORSHAM RH12 4UL

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

I believe that the location of this development is inappropriate. The closeness to a residential areas and the impact of highway capacity, potential impact on public health and the impact on the landscape are all unacceptable. I would also point out that this development is being proposed along side the already approved north Horsham development which will already have an impact of highway and the landscape within the area.

I would be massively disappointed if this was approved for my whole family.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDED DETAILS		

SENDER DETAILS		
Name	DR DAVID DUNNINGTON	
Address	14 Parkside Mews Hurst Road	
	HORSHAM RH12 2SA	

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
□ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

I object strongly to the proposed plan for the incinerator in North Horsham.

Of the 200k tonne capacity at the current site, only 132k is used which demonstrates that there is not a requirement for increased capacity in

West Sussex. Waste would need to be transported from other counties to "feed" the incinerator generating extra traffic and pollution. Waste management ought to be local in order to be eco-friendly and sustainable (EU Waste Framework Directive (2008/98/EC) Article 16: Principles of proximity and self-sufficiency).

Increasing the capacity for incineration reduces the incentive for recycling and thereby damages the circular economy. This was highlighted

by the government's own chief scientific advisor Professor Boyd last year.

There are grave concerns over adverse health issues from incinerators, especially for children and babies. The extent of harm caused by emissions has still not been thoroughly investigated and there is additional strong concern that emissions are not adequately monitored (UKWIN: "Waste incineration and particulate pollution: A failure of governance")

The massive structure proposed and consequent increase in pollution from emissions and traffic would be seriously detrimental to the amenity of the neighbourhood, especially nearby houses and schools.

In summary the plans as proposed are unneeded, unwelcome, contrary to good waste management principles and very possibly damaging to the health of residents.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR JON DURWARD		
Address	8 Nuthatch Way HORSHAM RH12 5HN		
ABOUT YOUR COMMENTS			
In what capacity do you	wish to make representations on this case?		
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)			
What kind of representation are you making?			
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>			

Nothing has changed since my objection to the original application. The building of such an incinerator can be nothing but harmful to the health of my family and I. An objective PEST analysis would show little to no value in such a proposal. I strongly object and trust that the planning committee and relevant appeal body appreciate that although the right to appeal may be valid, the grounds to uphold such an appeal are not.

### Jane Moseley

From: Steve Earl <

**Sent:** 19 February 2019 13:20

**To:** Skinner, Helen

**Subject:** Fwd: Incinerator proposal appeal: objection

Helen Skinner, The Planning Inspectorate, Room 3/J, Temple Quay House, 2 The Square, Bristol BS1 6PN

Dear Ms Skinner

Re: Incinerator Appeal at the former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West Sussex County Council's planning register (reference WSCC/015/18/NH)

We would like to strongly object to the proposed incinerator by Britaniacrest for the following reasons:

#### **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 centre, Swan Walk, and taller than the brickworks chimney, 26.5m. So far in excess of two other prominent buildings.

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

The site is too small for what is proposed in the way of an incinerator and the landscape planting.

#### **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 has shown a 2% increase in recycling and so to burn would encourage the council into long term contracts to keep a hungry incinerator burning. It is inevitable that recycling will drop, as is likely 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 it intends to burn black sack waste as well as industrial, which is surely going against council sustainability policy?

Burning waste is short sighted and damaging to the long-term wellbeing of the planet.

WSCC taxpayers paid for the Biffa biomechanical digester, and local residents were told by Britaniacrest at its 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 level enjoyed by rural areas of 30-35dB. These 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 given 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 CC has already 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, bringing car pollution to our rural doorsteps. WSCC in its recent Connect magazine detailed that 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 thre Horsham area 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.

The proposals for an incinerator does not meet WSCC's 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.

#### **Operations**

Britaniacrest has made it clear that it does 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.

Yours sincerely, Steve and Sarra Earl Waterland Farm Rowhook West Sussex RH12 3PX

--

Steve Earl.

### Jane Moseley

From: J Edward

**Sent:** 24 February 2019 18:38 **To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Reference: APP/P3800/W/18/3218965.

Dear Sir / Madam,

This is advise that I **OBJECT** to the proposed appeal APP/P3800/W/18/3218965 and original planning application by Britaniacrest (ref: WCSS/15/18/NH).

My original objections still stand - see email below.

Also the link to the government portal <a href="www.planningportal.gov.uk/pcs">www.planningportal.gov.uk/pcs</a> in the email sent to myself on 17th January 2019, notifying that an appeal had been lodged gave "this page cannot be found".

Yours sincerely

Judith Edward

12 Lemmington Way

RH12 5JG

------ Forwarded Message -------**Subject:**Reference: WSCC/015/18NH **Date:**Sun, 22 Apr 2018 17:46:25 +0100

From:J Edward

To:planning.applications@westsussex.gov.uk

Dear Sir,

I am writing to OBJECT to the proposed planning application by Britaniacrest (ref: WSCC/015/18/NH). I object for the following reasons:

1) Air quality, dust and fumes.

From your own environmental health report, the planning application does not meet the air quality critera, with excesses in heavy metals. Air quality is a serious, under-reported issue. It has a long term effect on health. For this alone the application should be rejected.

2) Visual impact

The height of the tower is too great. The exisiting chimney is 28m tall, this will now go to 95m. This will detrimentally impact the visual environment.

3) Over supply of incineration facilities. There is no need for the facility for the waste that is generated in W.Sussex, there is the risk that WSCC get tied to a facility that has not economic value, and to feed it waste is travelling many road miles, again another air quality issue. MPs are considering the evidence that there

best economic case.	J	••	•	• ,
Yours sincerely				
Judith Edward				
12, Lemmington Way				
RH12 5JG				
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For more information please visit <a href="http://www.symant">http://www.symant</a>	-			

are too many incineration plants. In this situation to reject the application and keep thes status quo, is the

From: Emily Baker

**Sent:** 04 March 2019 17:32

**To:** helen.skinner@pins.gsi.gov.uk

To The Planning Inspector,

Re: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

I am a young mother and live in Bewbush, I will be in the direct pollution fallout from the proposed incinerator when the wind blows from the South West, which is the most common directionthroughout the year for Crawley. I strongly object to this application on several grounds...

Very concerned about the pollution that will affect myself and my young child. I have suffered from asthma all my life and I feel this will just add to our problems if it is built.

Crawley already has some hotspots for bad air pollution and we should be trying to lower our emissions not adding to them .

My sons school is also in Bewbush and I feel the added pollution will have an adverse effect on his health as he grows up .

The sheer size of the development is a complete monstrosity and will be seen for miles around and in keeping with Horsham and the surrounding area.

What we need to do is to cut down on our waste, recycle more and not to burn our waste.

Concerned Mother Emily-Jayne Baker 8 Harmony Close. Bewbush Crawley Sussex RH116BX From: Emma Peskett

**Sent:** 01 February 2019 09:10

**To:** Skinner, Helen

**Subject:** Planning Objection to Appeal APP/P3800/W/18/3218965 - Former Wealden

**Brickworks** 

Ref:

### TOWN AND COUNTRY PLANNING ACT 1990 APPEAL UNDER SECTION 78

**Site Address:** Former Wealden Brickworks (Site HB), Langhurstwood Road,

Horsham, West Sussex, RH12 4QD

**Description** Recycling, Recovery and Renewable Energy Facility and

**Ancillary Infrastructure** 

of development:

**Application reference:** WSCC/015/18/NH

Appellant's name:Britaniacrest Recycling LtdAppeal reference:APP/P3800/W/18/3218965

**Appeal start date:** 14 January 2019

FAO, Helen Skinner

This is my formal objection to the latest planning application and appeal for the Incinerator.

As a resident of Warnham village, it will have a dreadful impact both visually and environmentally including noise, emissions, traffic- on our lovely village and surrounding area.

Huge lorries will be trucking in commercial waste from all over the south east, creating yet more congestion on our over populated rural road network.

The enormous stack will be visible from miles away - creating horrific pollution with untold long-term health implications for our community.

This is totally unacceptable in such a heavily populated area- of which Warnham is also a Conservation area

I am hugely concerned about a massive industrial scale incinerator and its emissions being produced 1 mile from my home and my child's school at Warnham.

Yours sincerely,

Emma Peskett

From: Emma S

Sent: 18 February 2019 19:36 To: helen.skinner@pins.gsi.gov.uk

concern for Horsham APP/P3800/W/18/3218965 Subject:

#### Dear Helen,

my husband and I moved to Horsham 2 and a half years ago with plans to start a family. We bought our house here due to the beautiful and largely unspoiled nature surrounding. We find great peace along the river walk and at Warnham nature reserve and are alarmed by the idea of an industrial and commercial incinerator nearby!

We had a beautiful baby boy 14 months ago and have been happy in the knowledge that he can grow up with healthy natural surroundings, playing outside in the fresh air, away from screens.

If the appeal is not rejected, and if the incinerator is then given the go ahead, we will relocate. We will rent out or sell our house and move away from Horsham, this small market town. We may consider leaving the UK altogether if our government considers it appropriate to build industrial incinerators so close to housing and nature reserves.

We are saddened and disgusted by the suggestion.

We have real concerns over air quality, pollution and of course the massive amount of additional traffic that would accompany this development. Horsham infrastructure is already fully loaded with the new housing developments increasing the population and services provided.

Does the Government consider Horsham, a small market town, Warnham nature reserve and the residential areas surrounding the site of the proposed development to be a suitable location for this huge, damaging and polluting monster?

If so, we will take our skills, money and prospects elsewhere.

Companies must be held to account over waste - they must commit to more environmentally friendly methods of waste disposal.

Best, **Emma** 

## Jane Moseley

From:	
Sent:	01 March 2019 12:47
To:	helen.skinner@pins.gsi.gov.uk
Cc:	KEITH RILEY
Subject:	Appeal ref: APP/P3800/W/18/3218965
Attachments:	190301 JH to PINS.pdf
Dear Helen,	
Please see attached a letter from t Britaniacrest Recycling Ltd, appeal	the Environmental Services Association in support of the planning appeal by ref: APP/P3800/W/18/3218965
A hard copy will be placed in the p	post.
Thank you for your consideration.	
Regards,	
Jacob Hayler	
Executive Director	
Environmental Services Association	
020 7591 3200 http://www.esauk.org	
Follow us on Twitter @ESA_tweets	
privileged material. Any review, retra	led only for the person(s) to whom it is addressed and may contain confidential and/or nsmission, dissemination or other use of, or taking of any action in reliance upon, this e intended recipient(s) is prohibited. If you received this in error, please contact the sender nputer.
Please consider the environment. Bef of paper = $6\%$ of a tree and $5.4$ kg $CO_2$	ore printing this e-mail message, ask yourself whether you really need a hard copy. 1 ream in the atmosphere

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1



# FROM THE EXECUTIVE DIRECTOR Tel 020 7591 3200

e-mail: j-hayler@esauk.org

01 March 2019

FAO Helen Skinner
The Planning Inspectorate
Room 3/J
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam,

Re: Appeal Reference: APP/P3800/W/18/3218965
Britaniacrest Recycling Ltd
Former Wealden Brickworks
Langhurstwood Road
Horsham
RH12 4QD

We write in connection with the above planning appeal.

We wish to offer the support of the Environmental Services Association to the proposal and request for the appeal to be upheld, overturning the refusal for planning permission determined by West Sussex County Council.

The Environmental Services Association (ESA) is the trade association which represents the UK's waste management and secondary resources industry. ESA's members provide a wide range of essential resource management services to the public and private sectors. The UK's waste and secondary resource industry is leading the transformation of how the UK's waste is managed. An industry with an annual turnover of £11billion, our Members have helped England's recycling rate quintuple in the last decade and provide 12% of the UK's renewable electricity. The ESA welcomes the opportunity to make this representation to PINS.

Responsible management of waste is an essential part of any economy if it is to thrive and develop. ESA's fundamental approach to sustainable waste management is to encourage the minimisation of waste in the first place and then to maximise its reuse and recycling. It is an unfortunate fact of life, however, that for whatever reason, the UK still has to deal with large quantities of residual waste – i.e. that waste that remains after reuse and recycling has taken place. Whilst developing facilities for the disposal of that waste is not the main thrust of what we are seeking to achieve, it is also a fact that the country is now suffering from a lack of infrastructure to deal with it. This situation is now growing to an alarming position – especially in the south of England.

In November 2018, the ESA along with the consultancy company, Tolvik published a detailed report which independently assessed the potential capacity gap between the quantity of residual waste arising and the infrastructure required to treat it in a responsible manner. Our findings concurred with six other reports that have been published by others on the same issue over the last two years or so. In our report, Tolvik assessed five scenarios, estimating the gap in waste treatment infrastructure that will occur in 2030, depending on the recycling rate. These scenarios ranged from 'No Change' to a 'High Recycling' scenario. It concludes that even if the UK reaches a recycling rate of 57% in 2030 (it is currently 45.3%), the capacity gap will be some 5.7 million tonnes. In the more likely scenario, the capacity gap could be 10.2 million tonnes.

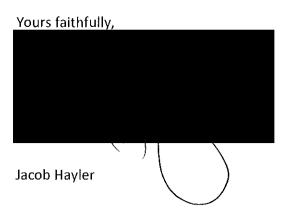
Britaniacrest Recycling Ltd submitted a full planning application to West Sussex County Council, including an Environmental Statement and Environmental Impact Assessment that described the proposed facility in detail and demonstrated its acceptable impact, The officers of the Council, considered the application in detail and recommended its acceptance. Even the host District Council, Horsham made no objection to the proposal, nor did any of the statutory consultees. Despite this, the planning committee of West Sussex County Council refused the application on 11<sup>th</sup> July 2018, giving six reasons for the refusal. Following Britaniacrest Recycling announcing that it would appeal the decision, the County Council subsequently withdrew support for five of those six reasons, leaving only the visual impact of the proposed facility as the only issue it wishes to defend. Whilst ESA does not wish to question the reasoning of the elected members of the council, it does appear that most, if not all, of the reasons given for refusal were indefensible.

It is of concern to the ESA that there is a perception of waste management infrastructure that gives rise to an emotional negative response by the public at large which then breeds a reluctance in local councillors to support the development of such facilities. It would appear from this reversal of the position of West Sussex County Council, that such a case may well have happened here.

There are only three options for the treatment of residual waste – (a) landfill; (b) energy from waste; and (c) export out of the country. Due primarily to the lack of facilities, the UK is currently exporting just under 3 million tonnes of residual waste per year. This waste is, in fact, being sent to energy from waste plants - but these are located in countries such as Sweden, Holland and Germany and actually represent a loss of resources and economic wealth from the UK.

Within the southern counties of England there is now only one significant active landfill and whilst there are energy from waste facilities in Kent, East Sussex, Hampshire, and one under construction in Surrey, these are all dedicated to local authority household waste in those counties and each has no significant capacity remaining. West Sussex has no landfill and no energy from waste facility. Whilst a facility has received planning permission at Ford, in the south of the county, there is no indication that this will actually be constructed. There is, therefore, a strong need to deal with waste generated within the area locally and is the reason why this facility is urgently required.

The remaining reason for refusal stated by West Sussex County Council is that of visual impact. This is an issue that ESA cannot comment on specifically so far as this precise development is concerned. However, there are now over 40 energy from waste facilities such as that proposed here. Whilst most are significantly larger than that proposed at the former Wealden Brickworks, they all have similar characteristics and their design is primarily based on the function that they have to perform. This includes process requirements that are set in law under the Industrial Emissions Directive which determine their size. Whilst the applicant can go to great lengths to camouflage the appearance of the facility and whilst it is possible to reduce the visible height to a small extent by excavating into the ground, it is always the case that these facilities will be visible to some extent or the other. Most, like that proposed at Wealden Brickworks, however, benefit from architectural treatment, and despite being whatever size they have to be, they are not unpleasant to look at. Experience shows that the fact that part of the building - and certainly the chimney stack - may be visible, sight of the facility does not adversely impact people's lives. Whilst it will be for the inspector to decide whether the visual impact of the proposed development at Wealden Brickworks is acceptable or not, we would request that due consideration is given to the fact that it is impossible to make an energy from waste facility "disappear", wherever it may be sited, and in considering the acceptability of the proposal due weight is given to the need for it offsetting whatever minor visual impact it may impose. If such facilities are to be invisible, none would ever be built anywhere – and that is just not an option this country can sustain.



### Jane Moseley

From: Jonathan Essex <

**Sent:** 04 March 2019 23:23

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Former Wealden Brickworks appeal submission - Jonathan Essex 4th March 2019

**Attachments:** Former Wealden Brickworks Essex Mar19.pdf

Dear Helen Skinner,

Please find enclosed submission to be considered at the appeal reference APP/P3800/W/18/3218965 and site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

I would be grateful if you could acknowledge receipt.

Best Regards Jonathan Essex

Cllr, Redhill East, Surrey 07801 541 924

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# Submission to Inspector regarding Appeal reference APP/P3800/W/18/3218965 and site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

Ref: Appeal Reference APP/P3800/W/18/3218965

From: Cllr Jonathan Essex, 39 Common Road, Redhill, RH1 6HG. <u>Jonathan.essex@greenparty.org.uk</u> To: helen.skinner@pins.gsi.gov.uk

This submission regards the waste need which is set out as the first reason for refusal.

### No Waste Need for Energy-from-Waste Facility

The West Sussex Waste plan referred to waste at end of 2005/6 year. The total amount of waste disposed to landfill in West Sussex fell from 316,000 tonnes in 2004 to 308,000 by March 2006. Since then the following changes are noted, which should be taken into consideration:

 Waste levels have fallen and recycling levels plummeted since the Waste Strategy and Plan for West Sussex were last updated. This means the waste need is far lower than stated compared to that required for in the plan. This should be reflected in consideration of need for residual waste treatment.

The Joint Materials Resource Management Strategy (MRMS) for West Sussex (2005-2035) was published in 2006 and aims for: 45% recycling and composting and 0% waste growth by 2015. This was noted as being currently reviewed and updated in 2013 but no updated MRMS is on the council website.

The waste need is based on the West Sussex Waste Strategy which is now significantly out of date.

Government waste statistics<sup>1</sup> show how waste trends have happened in the period since the WSWS was published. Across England recycling rates have increased from 30.5% in 2005/6 to 46.7% recycling rate in 2017/18. South East 2005/2006 averaged 841kg/household residual waste. This dropped till 541kg/household. This is a drop of 300kg/household or 64.3% of what it was. In West Sussex, residual waste/household has fallen from 611kg per household in 2010/11 to 501kg in 2017/18. At the same time recycling rates have increased from 44% to 51.3% across the county.

This change is ongoing. Total 'waste from households' in England decreased by 1.5 per cent in 2017 to 22.4 million tonnes from 22.8 million tonnes in 2016. This is equivalent to 403 kg per person, down from 412 kg per person in 2016 a decrease of 2.2 per cent.

- 2. An incinerator will require waste over its full life time. Whereas a landfill site is developed over its lifetime, an incinerator requires a high up-front capital investment. Once built it is likely to attract waste to return the upfront investment. Therefore, the (lower) waste need at the end of the lifetime of an energy-from-waste plant, not just at the time it is granted planning permission should be considered.
- 3. **The New Circular Economy Directive** was passed in the EU parliament on 18 April 2018, setting ambitious, legally binding EU targets for waste recycling and reduction of landfilling.

<sup>&</sup>lt;sup>1</sup> https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables

This has been reflected in the new Waste Strategy for England (Defra, 2018) <a href="https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england">https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england</a>. This requires significant change so the assumption that future will be a continuation of past trends should not be taken. Over waste levels should *reduce*, and the levels of reuse and recycling should rise further than recent trends in England.

- Firstly, as England catches up with best practice/policy already implemented in Wales and Scotland who already have devolved waste strategies and significantly higher recycling (and lower residual waste) volumes.
- Secondly, due to policy changes proposed at a national level as a result of the Defra proposed 'Key Milestones' at the start of the new waste strategy. This includes eliminating food waste to landfill, eliminating unrecyclable plastic which alongside recycling paper/wood and metals will drastically reduce remaining residual waste. This commits UK and local government to 'lead by example' (section 2.4).
- 4. Evidence accompanying the new waste strategy and by Eunomia sets out how that additional incineration capacity will likely constrain recycling levels. It says (p77):

According to our internal analysis, shown below (Figure 9), significant additional residual waste energy recovery capacity such as incineration or advanced conversion technologies – above that already operating or planned to 2020 – would not necessarily be needed to meet an ambition of no more than 10%<sup>263</sup> Municipal Solid Waste (MSW) to landfill by 2035, if a 65% MSW recycling rate is achieved by that same year<sup>264</sup>.

Tolvik Consulting Ltd. carried out a similar assessment, bringing together existing reports around Energy from Waste, and concluded that there would not be a gap in incineration capacity in 2030, provided the 65% MSW recycling rate ambition was met (Figure 9 below). The risk of a gap in capacity is, however, still relevant, as projections on future capacity, exports and arisings are subject to uncertainty<sup>266</sup>.

263 10% of MSW is estimated to be between 5Mt-6Mt per annum by 2035 264 With MSW residual arisings predicted to fall to 20-21Mt per annum by 2035 under a 65% recycling rate

265 The environmental balance between landfill and energy recovery will depend on several factors such as

the composition of waste landfilled, the efficiency of energy recovery, etc. 266 Tolvik Consulting Ltd. (2017) UK residual waste: 2030 market review

This analysis assumes that refuse derived fuel (RDF) exports remain at the current levels.

Eunomia (2017) - The 12th edition of our Residual Waste Infrastructure Review highlights the significant growth in residual waste treatment capacity that has taken place since the company started tracking facility development. The report finds that:

- Since 2009/10, the UK has more than doubled its residual waste treatment capacity, which has increased from 6.3 million tonnes to 13.5 million tonnes.
- Over the same period, the quantity of residual waste suitable for treatment has fallen from an estimated 30 million tpa to 26 million tpa.
- There is a lack of clear, reliable data for commercial and industrial waste and as the gap between treatment capacity and arisings closes, the need for better information becomes increasingly urgent.

With more facilities still in the construction pipeline, the report forecasts that the UK's supply of treatment capacity will exceed the available quantity of residual waste in 2020/21. Were all facilities to operate at full capacity, together they would limit the UK's recycling rate to no more than 63%.

### 5. Latest C&I waste arisings and future trends.

The recent Swindon appeal case<sup>2</sup> highlighted the need for appropriate baseline figures for C&I waste. This should, like the MSW, reflect how C&I volumes have changed since the production of the waste plan, and how they will be impacted by the Defra Waste Strategy (2018).

### **Climate Change Impact of Energy from Waste Facility**

The climate change impact of the proposed energy-from-waste facility should be considered. Analysis of CO<sub>2</sub> emissions from similar scale energy-from-waste (incinerators) show that the green house gas emissions are similar to that due to methane leakage on a landfill site unless the planning permission requires heat capture. That is not the case in this instance.

The total emissions (gCO2/kWh) for new electricity generation to say within the government's carbon budgets is proposed to be a maximum of 50gCO2/kWh. The figure for energy-from-waste technologies is around 500gCO2/kWh – about **10 times this**. Therefore, building this plant will detract from, rather than help, the UK meets its existing carbon emission reduction targets.

The IPPC special report on 1.5C global warming (<a href="https://www.ipcc.ch/sr15/">https://www.ipcc.ch/sr15/</a>) notes that these targets are inadequate to stop dangerous climate change. This means that we need to be far more careful (employing the precautionary principle) in investing in new infrastructure. This investment would be a mistake.

Finally, as noted above installing this incineration capacity in West Sussex is likely to constrain future recycling levels in West Sussex and the South East. The carbon emission benefits from recycling over incineration are substantial.

### Conclusion

This submission considers two aspects: waste need and climate change. The former was considered in the planning decision. The latter was excluded as submissions made to the council were not reflected in the officer report to councillors on the planning committee. For these two reasons alone the appeal against the refusal to grant this planning permission should be dismissed.

 $<sup>{}^2\</sup>underline{\text{https://pa1.swindon.gov.uk/publicaccess/applicationDetails.do?activeTab=documents\&keyVal=O8JVLPPT04V}{00}.$ 

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
APP/P3800/W/18/3218965	
BRITANIACREST RECYCLING LTD	
Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

# Name MS BEVERLEY EVANS Address Tillington Cottage, Farthings Walk Farthings Hill HORSHAM RH12 1WR

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

Hello,

I would just like to say that I am opposed to this development. I use the A24 every day and was behind a large vehicle this morning and the traffic jam is caused was horrendous. Cars will overtake and take risks on this deathly road. It would be inappropriate to build on the A24 as this would result in many tragic accidents. Cars go too fast. This is not 5e right decision to take and therefore I am appealing wholly against any planning application for the waste disposal.. stop closing our landfills. Beverley Evans

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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DETAILS OF THE CAS	E	
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR CLIFF EVANS	
Address	7 Chaffinch Close HORSHAM RH12 5HA	
ABOUT YOUR COMME	NTS	
In what capacity do you	wish to make representations on this case?	
☐ Appellant☐ Agent☐		
✓ Interested Party / Person  □ Land Owner		
☐ Rule 6 (6)		
What kind of representat	tion are you making?	
☐ Final Comments ☐ Proof of Evidence		
☐ Statement		
☐ Statement of Commo  ☑ Interested Party/Pers		
☐ Other	on correspondence	

I am strongly opposed to the construction of the incinerator. I am not confident in anyway that fears over emissions and the detrimental effect on public health have been addressed. As I have two small children this is of extreme concern. As the venture is purely based around the capital and monetary gains for Britanniacrest I do not feel that they will implement the latest scrubbing technologies as used in countries such as Germany. Further i am also extremely concerned about the additional traffic on the local infrastructure AND the huge additional pollution this will result in from diesel refuse lorries. Please oppose this. The quality of life for the Horsham residents will be reduced, purely for the gains of a private company. This is not acceptable.

### Jane Moseley

From:

Sent:

15 February 2019 21:21

To:

helen.skinner@pins.gsi.gov.uk

**Subject:** Objection Letter

Good Evening here is my letter of objection , regarding appeal for Incinerator

I Strongly object to the Planning application WSCC/006/18/NH Britaniacrest. This is totally unsuitable for our area for many reasons.

- 1. Site line (outlook) of the chimney and smoke plume, with possible pollutants.
- 2.We live close to the proposed Plant and experience daily fumes, odours and dust from the Biffa Plant this will only get worse for us if this application goes ahead, I am at present commissioning a clean air survey close to our property the findings will follow, i I expect the air quality to be over the permitted directive. as my wife is an asthmatic this will be unacceptable.
- 3. The traffic will increase along Langhustwood Road I personally have seen a Britaniacrest vehicle depositing rubbish along the bypass and Langhurstwood Road . Please contact for further details Reg number and photo evidence.
- 4. There is no pedestrian walkways along langhurstwood Road making it extremely dangerous for pedestrians now.
- 5, we are concerned that the noise will be unacceptable as we already have a high degree of noise from the Biffa Plant which is a disturbance for us and our neighbours.

Regards

John Evans

John Evans (cswip AweldI)



# **Evans Inspection Services**

Horsham Wset Sussex RH124QD 07976 444316

Email john@coding4welders.com Web www.coding4welders.com

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# The Planning Inspectorate

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR ROGER FAIRWEATHER	
Address	36 Grebe Crescent HORSHAM RH13 6ED	
ABOUT YOUR COMME	NTS	
In what capacity do you	wish to make representations on this case?	
☐ Appellant		
☐ Agent ☑ Interested Party / Per	rson	
□ Land Owner		
☐ Rule 6 (6)		
What kind of represental	tion are you making?	
☐ Final Comments		
<ul><li>☐ Proof of Evidence</li><li>☐ Statement</li></ul>		
☐ Statement of Commo		
✓ Interested Party/Pers	on Correspondence	
☐ Other		

I am very much in favour of a local incinerator. The ability to reduce landfill if far more important than the nimby objections as published in the local press.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349

# Name MR PAUL FALVEY Address Mid Summer Barn, Graylands Farm Barns Langhurstwood Road HORSHAM RH12 4QD

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

My comments are the same as last time, my family and I completely oppose this from a location and health point of view. Our eldest son has a history of chest problems and we have major concerns that an incinerator on our doorstep will cause these to occur more regularly.

Location wise it's ridiculous have this so close to properties espcially after recently agreeing to proceed with the North Horsham Development. During the last appeal the developers provided a huge document explaining why an incenerator opposite the new development is not acceptable.

We know there have been a number of discussions around lorries using Langhurst Wood Road and this WILL increase no matter what is said in the planning, it has to if this site is going to take in rubbish from locations further afield.

Our son's school bus picks him up from our road each morning along with a number of children up and down Langhurst Wood Road. With more lorries using the road, this is not acceptable and a major safety risk for the children and the bus drivers stopping and starting up and down the road.

From our garden and more than likely the everyone living in Horsham's gardens, the chimney will loom up and to say it won't impact on the view is not acceptable. It HAS to have an effect on the landscape, views and surrounding countryide.

The plumes of smoke it will discharge will cover our house, gardens and the whole area and on days like today where there is considerable rain, winds and storms it will only get worse.

The incinerator can not go ahead for so many reasons and for so many personal reasons it will affect our family and our home.

For official use only (date received): 04/03/2019 15:01:13

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
CENDED DETAILS	

SENDER DETAILS		
Name	MS ALISON FARRELL	
Address	14 Parkside Mews	
	Hurst Road HORSHAM RH12 2SA	

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

The people of Horsham met government recycling targets two years ahead of schedule but all this work will be undermined if the incinerator is built because commonly recycling rates decrease in areas where incinerators are built.

Only last year Professor Boyd The Chief Scientific Advisor to the Department for Environment, Food and Rural Affairs (Defra) warned against further investment in energy-from-waste (EfW) capacity in the UK while speaking at a hearing of Parliament's Environment, Food and Rural Affairs (EFRA) Committee. He suggested measures including an incineration tax and a moratorium on new incinerators, whilst encouraging recycling, and innovative recycling processes. These views were in line with those expressed by the European Commission in 2017 which highlighted how incineration can harm the circular economy, where waste is a seen as a resource and not a "feedstock" to burn in an incinerator.

Thanks to programmes like Blue Planet and the daily TV and newspaper images of dolphins, turtles etc harmed by plastics a movement which is gathering momentum - ie in the first place to reduce waste and then to re use, upcycle and reccycle. This appetite has been recognised hence significant investment in businesses developing technologies to revolutionise the way people reuse products and their life cycle. By the time the incinerator comes on line there will have been a seismic shift in waste management and in short order it will be a white elephant but in the meantime the impact on the visual amenity and landscape will have been irreparably damaged and the Council's efforts to encourage Horsham to be seen as an attractive destination will have been ruined and quality of life in Horsham and surrounding villages blighted. The question is why? Why should one company's drive for profits which will not benefit the town outweigh the needs of the whole town.

I have come across a handful of people who think the incinerator is a good idea and often it turns out they are connected with some form of waste management. Many people sadly still don't know of the blight which is approaching but when they are made aware the first response is genuine shock followed by disgust at the prospect.

There are many more reasons for rejecting the incinerator

It has not been demonstrated that the incinerator is needed to maintain net self sufficientcy to manage the transfer, recycling and treatment of Waste generated in West Sussex.

Even if we did need extra capacity and the incinerator was built there is no saying that it would necessarily go to this incinerator. It might be trucked to other incinerators who may charge less whilst the incinerator imports waste from 6 counties. This is against current government advice about the need to decrease carbon footprint

There is already excess capacity in other incinerators

Just building the incinerator will be a mis-use of natural resources.

It will adversely affect other local businesses including a day nursery close to the site and all the firms on the Graylands estate which will be forced to use the already very inadequate access road.

This is a private enterprise which will bring very few jobs to the area and very little good for local people

It will be an eyesore (looks like a vast aircraft hanger with a 95m chimney) very close to an area of outstanding natural beauty, historic villages (such as Warnham) and classic English Market Town of Horsham.

There is no realistic possibility that this eyesore will be screened by trees even taking into account the contours of the landscape and particularly not in winter. Therefore it will have an unacceptable impact on landscape and visual amenity especially for the 2750 new houses, nursery and schools due to be built in close proximity not to mention all those driving or coming into Horsham by train who's first

view will be the incinerator chimney. Hardly the image of Horsham that HDC are trying to promote of a worthy tourist destination.

A 95m chimney is close proximity to Gatwick airport (which is due to be expanded) cannot be advisable. I understand the final design of the chimney has not even been agreed and that it could be a different width, size or may even need a double chimney

Unacceptable congestion and wear on our roads causing our already heavy council tax bills to increase

Increase pollution due to increased traffic, the incinerator itself and the lighting of the 95m chimney

The effect of the pollution from the incinerator on public health, especially those of babies is still a subject of fierce debate.

I have talked to people who have experience of living near incinerators. They were all very negative. Some say "don't be fooled – they smell – whatever the publicity says". Others that they are very imposing in the landscape and still others that you are promised you won't see the chimney output much but that is not the case. One man even said he had moved his family to Horsham away from because he thought it would be better for his children's health.

There is no pressing need to for a decision to be taken now but if a yes decision is made the effects will be felt for decades to come. The negative effects on people's attitude to democracy should not be under estimated. When talking to people about the incinerator I have repeatedly been told that the government and their representatives never listen. If the incinterator is given the go ahead that will reaffirm people's opninion. It is saying thousands of you have marched and lobbied and made it clear that you don't want the incinerator which will not benefit Horsham in any way. You were supported by the County Council and still the business goals of one company out weigh the wishes of 1000s of people.

The goal of local and central government should be to support people's aim to increase sustainable recycling NOT to encourage their capacity to create waste. I respectfully urge you to reject this appeal.

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☐ Rule 6 (6)

□ Statement

☐ Other

☐ Final Comments☐ Proof of Evidence

What kind of representation are you making?

☑ Interested Party/Person Correspondence

☐ Statement of Common Ground

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE C	CASE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MS MIRYAM FARRELL
Address	6 Parkside Mews Hurst Road HORSHAM RH12 2SA
ABOUT YOUR COM	MENTS
In what capacity do y	ou wish to make representations on this case?
☐ Appellant	
☐ Agent ☑ Interested Party /	Porcon
☐ Land Owner	reison

I am proud to have lived so much of my life in Horsham. It represents quintessential ideas of what England represents. It is the kind of place where parents just like mine aspire to bring up their children and that is why they moved here. If an Englishman's home is his castle - he does not imagine it to be built near a 95m chimney and 12 storey incineration unit right next to the main roads leading to his town. When Jane Austen described the beauty of the views from Box Hill whilst Emma Woodhouse picniced there she couldn't have imagined that same view would be blighted by monstrosity of the Horsham incinerator. So how much worse will it be for those living in and around Horsham. The visual amenity will be blighted as will the landscape. It is a fable to think that such a building can be screened.

Despite promises on the Croydon incinerator that the plume will only infrequently be seen reports show it as being visible most days which brings me to another matter of deep concern. I have lots of friends who have small children and I am very concerned about their health from pollution generated by any incinerator and increased numbers of trucks on roads. 1000s of homes are due to be built very close to the proposed incinerator site.

People of my generation feel very aggrieved that decisions are being taken which will have sway for decades to come and that it is our future and our children's future that is being mortgaged for the sake of one company's private profits with no benefit to the community. The roads will be far busier, the pollution from other people's waste from 6 counties is being brought to our door step. The Council voted against allowing the incinerator and we felt very positive that someone was listening to the clear and overwhelming wishes of the people and now one firm is trying to get the voice of the people overturned.

The cumulative changes affecting Horsham and the surrounding area will be too great if this incinerator is allowed to progress. At a time when we the younger generation appreciate the need to cut down on waste we want money to be spent on researching reuse and other less environmentally damaging products not burning our waste and producing dangerous chemicals which are not properly monitored for decades to come.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		

# Name MR SIMON FENTIMAN Address 4 Chennells Brook Cottages Giblets Lane HORSHAM RH12 5QP

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
✓ Interested Party / Person
□ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

As a relatively local resident with small children I am concerned about the impact of a new site in close proximity to Horsham. In particular I am concerned about the health implications of the additional waste material being burnt and impacting the local atmosphere as well as the additional heavy goods vehicles (and their emissions) needing to travel to the site. I cannot see why this is not contrary to Policy W19 of the West Sussex Waste Local Plan 2014.

In addition the new site will have an impact on the local landscape contravening W12 and W13 of the West Sussex Waste Local Plan 2014. Again the impact on the next generation of this building will last for many years and therefore is not something that I wish to impact them with.

I believe that as the government is setting ambitious recycling and green proposals, including avoiding gas cookers for new homes, I cannot see why an incinerator is aligned to pushing for a greener West Sussex and Horsham. An incinerator seems to be promoting the disposal of non-recyclable materials.

With the additional housing being built around Horsham the highway capacity is already going to be heavily stretched and adding to this with additional vehicles needing to make frequent trips to the incinerator will add to the congestion and pollution.

Finally, I am concerned by the introduction of the incinerator that it will adversely impact the desire of people to want to live in North Horsham and the surrounding towns in close proximity to the incinerator. This would also have an adverse impact on property house prices and the desire to live in the new housing complexes that have been recently approved.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		

Name

MRS KATIE FLETCHER

Address

Grove Cottage, Horsham Road
Rusper
HORSHAM
RH12 4PR

ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
☐ Appellant		
☐ Agent		
☑ Interested Party / Person		
☐ Land Owner		
□ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence		
☐ Statement		
☐ Statement of Common Ground		
☑ Interested Party/Person Correspondence		
□ Other		

I wish to strongly object to the proposed incinerator. I am astonished that given the known environmental impact of this method of waste disposal, it is even being considered. Why are the council not investing in recycling facilities instead of this short term gain, highly damaging method. I do hope, for the sake of future generations, this proposal is rejected.

### Jane Moseley

From: Rachel Ford

**Sent:** 04 March 2019 20:45

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** RE: Proposed Horsham Incinerator APP/P3800/W/18/3218965

RE: Proposed Horsham Incinerator, Application Number: APP/P3800/W/18/3218965

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 - insane!

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. Especially when I have been told that it is 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 that would have a tiny fraction of impact compared to that of 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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### Jane Moseley

From: Stephen Ford

**Sent:** 04 March 2019 21:10

**To:** helen.skinner@pins.qsi.qov.uk; planninq.applications@westsussex.qov.uk; PL

Planning Applications

**Subject:** APP/P3800/W/18/3218965

Dear Horsham Planners,

RE: Proposed Horsham Incinerator, Application Number: WSCC/062/16/NH Appeal Reference: APP/P3800/W/18/3218965

I am writing to express my concerns regarding the appeal to build a new waste incineration plant in North Horsham. For the following reasons I would like to submit my objections to the appeal.

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.

I find it hard to accept that the council has determined there is no evidence there would be an unacceptable impact on highways, clearly to run such a facility there has to be an increase in HGV traffic, has this been determined before or after the vast increase in housing in the area? I would like to know what methods have been use to determine this outcome and what exactly is deemed as acceptable?

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.

A major concern of ours that has not been properly considered, is that **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. As residents living less than a mile from the proposed site, this is a serious concern to us. 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. Therefore, waste incineration is prohibitively expensive when health costs are taken into account.

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 is a planned school development in the North Horsham Strategic Development directly adjacent to the site, 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.

I am disgusted that the council are not upholding the objection of public health, what determination and evidence is there to support that there is no unacceptable impact of the health of the councils constituents? I demand to know what is considered as an acceptable impact. It is impossible to build an operate such a facility without emitting pollution in to the air around the local area, so some open clarity on what levels of particulate and toxins you will allow to be pumped into the atmosphere should be publicised so that residents are informed to the potential risks.

I would also question why incineration? In this era of technological innovation is incineration still a relevant option, what investigation has there been into other methods of waste disposal that are lower impact in terms of pollutants or emissions? Is it the case that other technologies are potentially to costly to profit margins and therefore ruled out? I would like to see what consideration has been made for other methods of waste disposal?

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 as it would not positively enhance the countryside or its surroundings, while having far less impact than a 50m 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,

Stephen Ford

(North Horsham Residents)

Stephen Ford



Prism, 1 Knightsbridge Green, London, SW1X 7NW prismteam.com



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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR STEPHEN FORD	
Address	129 Pondtail Road HORSHAM RH12 5HT	
ABOUT YOUR COMME	NTS	
In what capacity do you	wish to make representations on this case?	
☐ Appellant		
☐ Agent ☑ Interested Party / Person		
□ Land Owner		
Rule 6 (6) What kind of representation are you making?		
Final Comments		
□ Proof of Evidence		
☐ Statement ☐ Statement of Common Ground		
✓ Interested Party/Person Correspondence		
□ Other		

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.

I find it hard to accept that the council has determined there is no evidence there would be an unacceptable impact on highways, clearly to run such a facility there has to be an increase in HGV traffic, has this been determined before or after the vast increase in housing in the area? I would like to know what methods have been use to determine this outcome and what exactly is deemed as acceptable?

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.

A major concern of ours that has not been properly considered, is that 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. As residents living less than a mile from the proposed site, this is a serious concern to us. 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. Therefore, waste incineration is prohibitively expensive when health costs are taken into account.

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 is a planned school development in the North Horsham Strategic Development directly adjacent to the site, 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.

I am disgusted that the council are not upholding the objection of public health, what determination and evidence is there to support that there is no unacceptable impact of the health of the councils constituents? I demand to know what is considered as an acceptable impact. It is impossible to build an operate such a facility without emitting pollution in to the air around the local area, so some open clarity on what levels of particulate and toxins you will allow to be pumped into the atmosphere should be publicised so that residents are informed to the potential risks.

I would also question why incineration? In this era of technological innovation is incineration still a relevant option, what investigation has there been into other methods of waste disposal that are lower impact in terms of pollutants or emissions? Is it the case that other technologies are potentially to costly to profit margins and therefore ruled out? I would like to see what consideration has been made for other methods of waste disposal?

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 as it would not positively enhance the countryside or its surroundings, while having far less impact than a 50m 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.

T: 02036087612 M: 07496611110 Suite 6036, 1 Fore Street, Moorgate, London EC2Y 5EJ mp@powerhausconsultancy.co.uk www.powerhausconsultancy.co.uk PowerHaus

Consultancy

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 FACILITES 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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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

SENDER DETAILS	
Name	MR MARTIN FOWLER
Address	23 Hornbeam Close Horsham West Sussex RH13 5NP

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

I do not support the installation of an incinerator in Horsham. I have concerns about the pollution caused and the health of the people of Horsham, including my son. We should be investing in the future of this planet by investing in more carbon neutral solutions.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS JENNIFER GAMMON	
Address	2 Coleridge Close HORSHAM RH12 5PB	
ABOUT YOUR COMME	NTS	
In what capacity do you wish to make representations on this case?  □ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

All the reasons against this incinerator given in my previous submission are still valid and this appeal must be rejected for the sake of all the inhabitants of North Horsham and of the many new houses planned to be in the direct vicinity of this incinerator. The air in Horsham is already polluted enough, there is a large amount of rubbish on the verges and roadsides where rubbish lorries pass on the way to the existing landfill site.

Also the tall chimney will be a blight on the rural landscape north of Horsham.

From: Sent:	simon geale 04 March 2019 22:14
To:	helen.skinner@pins.gsi.gov.uk
Subject:	Appeal Reference APP/P3800/W/18/3218965
Dear Ms Skinner,	
developer plans to import up to residual municipal solid waste Facility at Former Wealden Bri	commercial and industrial incinerator in Horsham, West Sussex, UK. The 230,000 tonnes per year of residual commercial and industrial waste and/or from across 6 counties, to a Recycling, Recovery and Renewable Energy ckworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD with a metre-high permanently lit chimney.
Planning Application Number V Council for 6 reasons, reference	WSCC/015/18/NH was refused on 11th July 2018 by West Sussex County ng the county waste strategy.
	at the facility is needed to maintain net self-sufficiency to manage the at of waste generated within West Sussex.
highway capacity, residential an	n unacceptable impact on landscape and the visual amenity of the area, on menity and public health. The development, along with other existing, ment, including the North of Horsham development, would result in advers
I respectfully request that the ap	opeal is dismissed.
Kind regards	
Simon Geale	
Sent from my iPhone	
	the Symantec Email Security.cloud service. sit <a href="http://www.symanteccloud.com">http://www.symanteccloud.com</a>

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CA	ASE		
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR JAMES GLASS		
Address	Fairways Farthings Hill HORSHAM RH12 1TS		
ABOUT YOUR COMM	MENTS		
In what capacity do yo	ou wish to make representations on this case?		
☐ Appellant ☐ Agent ☑ Interested Party / ☐ ☐ Land Owner ☐ Rule 6 (6)	Person		
What kind of represen	station are you making?		
<ul><li>☐ Final Comments</li><li>☐ Proof of Evidence</li><li>☐ Statement</li></ul>			
<ul><li>☐ Statement of Common Ground</li><li>☑ Interested Party/Person Correspondence</li></ul>			

□ Other

We moved to Horsham for our family, the incinerator would have an unacceptable impact on the visual appeal of the area, which concerns me significantly as a home owner. In addition as a father i am VERY concerned about the impact on the environment and the unacceptable impact on health of my neighbours. The council should be doing more to recycle and to reduce waste rather than burn it.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE				
Appeal Reference	APP/P3800/W/18/3218965			
Appeal By	BRITANIACREST RECYCLING LTD			
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349			
SENDER DETAILS				
Name	MRS ELIZABETH GODDARD			
Address	24 Speedwell Way HORSHAM RH12 5WA			
ABOUT YOUR COMME	NTS			
In what capacity do you wish to make representations on this case?				
□ Appellant				
☐ Agent  ✓ Interested Party / Person				
□ Land Owner				
Rule 6 (6) What kind of representation are you making?				
□ Final Comments				
□ Proof of Evidence				
☐ Statement ☐ Statement of Common Ground				
✓ Interested Party/Person Correspondence				
□ Other				

As residents of North Horsham parish I would like to strongly object to the proposed incinerator being built and hope that you will reflect the refused outcome of last time. INCINIRATION IS ALREADY RECOGNISED AS OUTDATED....and the government are already moving against it as a means of waste disposal. 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 key facts must not be ignored: 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.

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# The Planning Inspectorate

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	

# Name MRS MICHAEL GORDON Address 76 Amundsen Road Horsham Horsham West Sussex RH12 5GF

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence

Other				

I have read, in the local Horsham papers, with great concern the intention to allow Britaninacrest to build a commercial and industrial incinerator in North Horsham on the site of the old brick works. The increase in heavy vehicles transporting the waste to the outskirts of the market town of Horsham is unacceptable in the 21st century when we should be looking at greater recycling initiatives, reusing and repairing. incinerating could cause unknown health hazards and pollution in London has already been shown to be directly causing asthma in young people. The new development of housing in North Horsham, with schools and a community will all be within a mile or so radius of the proposed incinerator site, which will no doubt blight their lives and affect house prices if the incinerator was given the go ahead. No one in their right mind would choose to buy a property in such close proximity to the site. Of course the impact on public health won't be known for a number of years, but why take the risk. The impact also on the environment, wildlife, and landscape of the area will all suffer as a result. There is development going on in the centre of Horsham to help enhance and improve the town as a desirable place to live and work. Approving this proposed incinerator will just undo all that overnight.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR MATTHEW GOULD		
Address	2 Avebury Close HORSHAM RH12 5JY		
ABOUT YOUR COMME	NTS		
In what capacity do you	wish to make representations on this case?		
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)			
What kind of representation are you making?			
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>			

I am against the proposed incinerator on the grounds of Impact to local residents due to unacceptable impact on landscape and visual amenity of the area. Unacceptable impact on Highway capacity. Potential impact on public health. Due to increases in housing and other development projects this would be an additional project that would cumulative have adverse impacts on Horsham and the surrounding area.

From: Marie-Emmanuelle Gros-Lemesre

**Sent:** 04 March 2019 17:56

To:Helen.skinner@pins.gsi.gov.ukSubject:Ref: APP/P3800/W/18/3218965

Dear Helen,

I am living in Horsham with my husband and children, and for the sake of the thousands families living here, I am objecting to the construction of the incinerator in our town by Britaniacrest Recycling Ltd at the following site

Former Wealden Brickworks, Langhurst Wood Road, Horsham, RH12 4QD. The reference of the appeal being: APP/P3800/W/18/3218965.

Kind regards,

Marie-Emmanuelle Gros-Lemesre 9 Orchard Road Horsham RH13 5NF.

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From: Jackie Gwilliam

**Sent:** 03 March 2019 19:57

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965

### Dear Helen Skinner

I believe the Britianiacrest incinerator should be refused because the development would have an unacceptable impact on the landscape and visual amenity of the area and I am sure that the development would have an unacceptable impact on the highway capacity. I have a young son and evidence suggests it will increase the level of pollution in the vicinity we live in North Horsham just the other side of the A264, please dismiss the planning appeal.

Thank you in advance.

Yours sincerely

Miss Jacqueline Gwilliam 70 Ropeland Way Horsham West Sussex RH12 5NY

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE C	ASE		
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR MICHAEL HALLAM		
Address	Birches, Ashmore Lane Rusper HORSHAM RH12 4PS		
ABOUT YOUR COM	MENTS		
In what capacity do y	ou wish to make representations on this case?		
<ul> <li>□ Appellant</li> <li>□ Agent</li> <li>☑ Interested Party /</li> <li>□ Land Owner</li> <li>□ Rule 6 (6)</li> </ul>	Person		
What kind of represer	ntation are you making?		
☐ Final Comments ☐ Proof of Evidence ☐ Statement			
	<ul> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> </ul>		

☐ Other

I am grateful that this Incinerator is likely to be built and able to deal efficiently witwaste resulting in little land fill waste. With modern exhaust cleansing equipment the impact on both the countryside and its inhabitants is minimal and is far preferred to other waste disposal means which frequently require huge lorries trans-shipping waste back & forth on our highways.

Horsham is a massive town now, with a huge waste production and I believe this Incinerator will be of great benefit to the community.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE C	CASE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR DAVID HAMMOND
Address	4 The Old Forge Rusper HORSHAM RH12 4FR
ABOUT YOUR COM	MENTS
In what capacity do y	you wish to make representations on this case?
☐ Appellant ☐ Agent ☑ Interested Party / ☐ Land Owner ☐ Rule 6 (6)	Person
	ntation are you making?
☐ Final Comments ☐ Proof of Evidence ☐ Statement ☐ Statement of Com	
<ul><li>Interested Party/F</li><li>Other</li></ul>	Person Correspondence

My girlfriend and I moved to Rusper a matter of weeks ago. It is a beautiful Sussex village with two great pubs, an old church, friendly village shop and a real sense of community. We have been spent the last few months excitedly dreaming about our future living in this village and how we can get involved, make life long friends and raise a family of our own. However we have had a rather sombre 24 hours since our discovery yesterday evening of the plans for an enormous incinerator to be built so close to our new home. Our major concern is the effect this will have on the air pollution in the area and we do not understand why a structure such as this would be placed so close to the surrounding residential communities. We will do our best to support the action groups although we are already beginning to consider our options if the plans do go ahead. Without a doubt we will not continue to live in the village and will look to sell our first home prematurely, as we are not prepared to deal with the health implications of this monstrosity.

From: Hannah Oguntade
Sent: 01 March 2019 22:07

To:helen.skinner@pins.gsi.gov.ukSubject:Ref APP/P3800/W/18/3218965

Hi Helen,

I would like to object to the planning appeal for the incinerator in Horsham. It will affect our air quality and most of what will be burned could be recycled! It would also be an eye sore.

Yours Sincerely Hannah Oguntade From: Debansi, Hans

**Sent:** 22 February 2019 08:36 **To:** helen.skinner@pins.gsi.gov.uk;

**Subject:** Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD

Appeal reference APP/P3800/W/18/3218965

Site address: Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

Dear madam,

As a resident living in the brickwork cottages adjacent, I am writing to implore you to dismiss the appeal for an enormous new incinerator at the former brickworks.

Having fought successfully to have the application rejected by the council, citing six grounds for doing so, we are dismayed to discover that the councillor who was publicly and adamantly pro incinerator is now charged with putting forward the case for its rejection to you.

I discover that having taken 'advice' she has dropped all but 1 of the reasons to object to the appeal. It is not at all clear what the exact details of this advice and its sources are. It appears that the dismissal of the five out of six reasons for objection are based largely on supposition more than fact.

We all know that lack of hard evidence for something that hasn't yet happened does not equate proof of truth or outcome. There is a good deal of grey area and unproven statements which the councillor has accepted as fact and given benefit of doubt to the applicant rather than the people she is supposed to be representing and is therefore refusing to put forward those arguments on my behalf.

This proposed building is a private commercial concern and is truly massive... the chimney stack alone is taller than the statue of liberty and the building itself will be highly visible and out of place in its setting which is visible from top beauty spots in the area, even if the stack is reduced by a few meters it will not alter its visible impact.. I am astonished at the lie given from the applicant that the building will not be visible. Such a blatant lie gives question to the truth of the other facts given by this applicant. Truths which will affect for example the amount of road traffic and the effect of such, but which the councillor accepts the applicants current statement that this will not increase.

It is also in an area extremely close to residents and where there is planning approval in place for housing developments nearby. This site is simply inappropriate for such a huge construction which will be a devastating blot on the landscape surrounding the lovely market town of Horsham and its surrounding villages. Currently when you look at this area you see green fields and trees... a building of this size and scale is well above the tree height and will be an ugly blight seen from as far as Leith hill and the South Downs.

I am one small voice amongst a group of small voices who does not have the resources to fight against the consequences and effects of this building being built adjacent to our homes, consequences that are being played down by the applicant.

I would also like to point out that with the current trend moving more and more towards developing bio degradable and reduced packaging, recycling, eliminating single use plastics and other ground breaking initiatives I feel that there will in the next few years be a rapid decrease in waste from the public sector. New incinerators are not the way to move forward in a progressive and healthy direction.

The size and expense of this development will mean that it will need to run for 20+ years in order to recover costs. Which means that in a world that is increasingly aware of climate warming and the desperate need to reduce carbon emissions there will be a vast legacy to the 'bad old' days pumping out CO2.

Please consider my appeal to you and reject this application for the final time.

Hans Debansi 7 Station road Warnham West Sussex RH123SR

From: Nicola Gill

Sent: 28 February 2019 18:01

To: Helen.skinner@pins.gsi.gov.uk

**Subject:** Planning Appeal , Horsham Incinerator

Ref APP/P3800/W/18/3218965

We strongly object to the above proposed incinerator at Langhurstwood Road

The objections are many and varied and support the endless list of valued and passionate objections you have already received

The huge chimney stack for want of a better word, would be a massive eye sore (an understatement!) on a beautiful open landscape, ugly, unsightly, and grotesque in its form amongst a rural, conservational area. An area that is home to an established nature reserve, a haven rich in wildlife and habitats, as well as Warnham deer park with its history going back many years.

The traffic in the proposed area already constitutes to much pollution and emissions along the very busy A24 and A264 and surrounding roads, much of which comes through our village at speed to avoid congestion building at the various roundabouts at Rusper, Great Daux, and Robin Hood Lane The excessive lorries and high sided skip like container lorries that already leave the Langhurst slip road to the A264 are a danger and threat to those travelling along the dual carriageway there, having experienced many times that they have no consideration to careful drivers, by pulling out without caution and at speed, with urgency, the sheer scale and size of their vehicles imposing as they 'bear down' on other vehicles, extremely dangerous and intimidating to a steady stream of traffic The A264 and the surrounding infrastructure cannot take anymore of these type of vehicles, on an already busy congested road, coping with demands of those travelling to work, commuting to Gatwick and holiday makers using the A24 to travel south The proposed build for the area north of Horsham with a further development of housing, schools, etc creating another community and living space will add to the pressure and demands on the roads as well as the pollution arising from the increased traffic

What else can be said? The community here are very passionate in their views, and live here because they have respect for their area and surrounding countryside and all that is offered up by that. Britaniacrest Recycling Ltd, who have their opinions and reasons for a recovery and renewable energy facility should be advised to look at an alternative site that can accommodate what they are proposing in a location that can service that better , there MUST be an alternative surely elsewhere in the county?

Steve and Nicola Harding Robins Green Knob Hill Warnham West Sussex RH12 3SN

From: Jonathan Haynes

**Sent:** 01 March 2019 09:35

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Planning Appeal Ref: APP/P3800/W/18/3218965

Dear Helen,

I would like to express my objections to this proposed development under appeal on the following grounds:

- 1. The proposed development is totally inappropriate in a countryside setting in terms of location, scale and visibility.
- 2. The inappropriate proximity of the proposed development to residential areas of Warnham Parish and the village conservation area with environmental concerns over pollution, night time noise and illumination.
- 3. I fully endorse the Warnham Parish Council's original and now extended scope of objections to this inappropriate scheme.

Please could you ensure that these comments are fully taken into consideration when deciding upon this development.

Yours sincerely,

Jonathan Haynes Home Farm Washington West Sussex RH204AT

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□ Proof of Evidence

☐ Statement of Common Ground

☑ Interested Party/Person Correspondence

□ Statement

☐ Other

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

Appear Reference. AFF/F3600/W/16/3216903			
DETAILS OF THE CAS	SE CONTRACTOR OF THE CONTRACTO		
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR JAMES HEATHER		
Address	14 Poppy Close Southwater HORSHAM RH13 9GW		
ABOUT YOUR COMME	INTS		
	wish to make representations on this case?		
Appellant			
☐ Agent  ☑ Interested Party / Person ☐ Land Owner ☐ Rule 6 (6)			
What kind of representation are you making?  □ Final Comments			

I have recently moved to the Horsham District, mainly, to be away from the air pollution that was being released by the incinerator recently built in Beddington near Sutton, Surrey. About 2 miles from where I was living.

Despite reassurances by the local authority and owners that it was was safe and odourless, it was extremely unpleasant. On most days it was being used there was a strong acrid stench in the air which made walking my children to school, being out in the garden or walking in nearby parks impossible. My two children suffer from Asthma which is aggravated by pollution. The building of this incinerator would make it very unpleasant to be outside and enjoy the fresh air which is enjoyed in so many parts of surrounding parks and countryside.

The pollution created by the the burning of waste would be unpleasent, irritating, unhealthy and harmful to peoples health especially older people and children. The extra vehicular traffic would also create extra pollution, more HGVs on the roads, possibly at all hours of the day.

From: Peter Hellyer <

Sent: 03 March 2019 19:55

To: PL Planning Applications

Subject: Re: Extended Deadline for Submissions & New Weblink: Planning Appeal

APP/P3800/W/18/3218965 - Former Wealden Brickworks)

I wish to re-affirm my opposition to the proposal for an incinerator in North Horsham. The application appears to pay no attention to the fact that the incinerator, if built, will be directly adjacent to the proposed housing development sites in North Horsham. The location of the incinerator is inappropriate for health and visual amenity reasons. The plume from the stack will discharge over North Horsham, Kilnvale, Bewbush, Broadfield, Ifield and Crawley, taking into account prevailing winds. It beggars belief that any serious commercial enterprise would seek to justify such a location for such a purpose. Finally, incineration in itself is not a long-term solution to waste disposal as it only adds to global warming, a phenomena established as happening from scientific records spanning the globe from North to South Poles and the dangers of which are well known. The technology that forms the basis of the proposal, incineration is already regarded by many to be outmoded technology regardless of the precise methods used to achieve it. Our atmosphere is not a dustbin into which we can tip our waste with impunity. Peter Hellyer- resident of North Heath Lane, Horsham

**From:** Jane Moseley <<u>jane.moseley@westsussex.gov.uk</u>> on behalf of PL Planning Applications <<u>planning.applications@westsussex.gov.uk</u>>

Sent: 26 February 2019 09:38

Subject: Extended Deadline for Submissions & New Weblink: Planning Appeal APP/P3800/W/18/3218965 - Former

Wealden Brickworks)

### All

As you may be aware, in light of our planning application website being down, the Planning Inspectorate has agreed to extend the deadline for comments/submissions on the above appeal to 4 March.

From today, application and appeal details can now be viewed here: <a href="https://westsussex.planning-register.co.uk/Planning/Display/WSCC/015/18/NH">https://westsussex.planning-register.co.uk/Planning/Display/WSCC/015/18/NH</a>

# Thanks Jane.

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

 $\textbf{Email:} \ \underline{\textbf{jane.moseley@westsussex.gov.uk}} \ | \ \textbf{Web:} \ www.westsussex.gov.uk}$ 

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▼ Virus-free. <u>www.avg.com</u>

From: Brendon Heneghan
Sent: 20 January 2019 14:25

To: 20 January 2019 14
Skinner, Helen

**Subject:** Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure.

### Appeal Reference APP/P3800/W/18/3218965

Brintaniacrest Recycling Ltd have put in an appeal to try to build a recycling site at Langhurst Near Horsham West Sussex.

I am against the application because it would mean more traffic movements there are going to build 2000 new homes and a school very near to the site. I think the very fine particles of dust could affect the long term health of the people.

Regards Mr B. Heneghan

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE C	ASE			
Appeal Reference	APP/P3800/W/18/3218965			
Appeal By	BRITANIACREST RECYCLING LTD			
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349			
SENDER DETAILS				
Name	MS SHAUNNA HENNING			
Address	Parkside Mews Hurst Road HORSHAM RH12 2SA			
ABOUT YOUR COMM	MENTS			
In what capacity do y  ☐ Appellant ☐ Agent ☑ Interested Party / ☐ Land Owner ☐ Rule 6 (6)	ou wish to make representations on this case? Person			
What kind of represer	ntation are you making?			
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> </ul>				
<ul><li>Interested Party/Po</li><li>Other</li></ul>	☑ Interested Party/Person Correspondence □ Other			

Please support me in saying 'No' we do not want this 95 metre chimney eye soar and incinerator built for so many reasons, I will cover just a few in this short request document.

We have voted this request to build an incinerator down a number of times already years and yet here we are again at very short notice trying to fight off this over whelming frustrating request by the developers to build it again. Their previous requests were objected to by the local families and the County Council, so why don't they get the message there is NO support for the incinerator and NEVER will be. We will fight their request each and every time it is re – submitted because it is NOT needed.

There is not the need here so they plan to drive heavily burdened lorries carrying over 230, 000 tonnes of residual Commercial and Industrial waste from SIX Counties to feed this monstrosity. The roads they plan to use are in extremely well used already and show the usual wear and tear on the roads in the form of pot holes and surface erosion. The route also takes in small narrow roads through country side and one area in particular has a small bridge which is already forces single direction traffic in order to pass. It seems clear that the wear and tear on these roads and the bridge which was not designed for regular heavy traffic will only get more damaged as these vast vehicles thunder through the country side causing further pollution of the environment when we have targets to cutting down emission and toxins for the nations health, especially from diesel engines.

The proposed site is next door to an area where new homes and schools are planned to be built, family homes, however they won't be safe for children who will be breathing in the toxins and harmful particles spewed out by the incinerator as they grow, play and develop. The breathing difficulties and ill health that will follow will lead to further burden on the NHS and health professionals and will be in direct conflict with the Government target for reducing omissions and clean air policy.

The pollution and damage to the environment and quality of our lives will be constant from the movement of heavy vehicles delivering other towns industrial waste and disturbance created by the light given off from the 95 metre high chimney, which must be lit 24 hours a day to avoid aircraft crashing into it, will be an eye soar in the beautiful country side as its planned to be as high as Nelsons Column.

Government and Councils have been focused on increasing the % of waste to be recycled and to help have introduced new initiatives to help encourage more recycling, so it would be worth noting that research shows that the rate of recycling decreases significantly whenever an incinerator has been built.

So please reject this developers request and say NO to the Incinerator and its 95 metre chimney. It's simply not necessary, there is no need for it and we locals from Horsham and surrounding areas believe that in the 21st century we should not be burning our waste and creating problems for our children's health and all future generations by building an incinerator and chimney. We must do our duty to safe guard our country side and 'areas of Natural beauty for our health and for us all to enjoy now and for the generations to come.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

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DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR ALEX HILL	
Address	70 Hillside Horsham RH12 1NG	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
☐ Appellant ☐ Agent		
☑ Interested Party / Person		
☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments ☐ Proof of Evidence		
□ Statement		
☐ Statement of Common Ground  ☑ Interested Party/Person Correspondence		
□ Other		

I am a local resident in Horsham and I do not want this horrible waste facility built in our local area

From: jonathan hill

**Sent:** 04 March 2019 19:53

**To:** helen.skinner@pins.gsi.gov.uk **Subject:** Ref: APP/P3800/W/18/3218965

Dear Helen,

### **OBJECTION**

I can't quantify my level of objection at the thought of such a monstrosity being built in the Horsham area. I think it's utterly absurd that this application has even got this far.

Not only would it be so unsightly in comparison to the surrounding area, but I'm not convinced that there aren't negative health benefits. The figures quoted for the energy the incinerating would provide as well are also grossly inflated and mythical.

I look forward to the compensation I would have to be entitled to once my house value diminishes if this application is successful, god help us all.

Kind Regards

A Horsham resident

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS ANTONIA HOCKINGS	
Address	1 Chaffinch Close Horsham RH12 5HA	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

Dear Sirs,

We have recently moved to Horsham and renting. I have heard about the plans building an industrial incinerator and I have felt very reluctant weather we should settle in Horsham. We have started to view houses to buy but I am not sure I would like to live in a place with incinerator. We have two small children and one is asthmatic I do believe incinerator will have negative impact on our health and air quality, create a lot of traffic and have negative impact on the landscape and Visual outlook. I understand the need for a waste disposal but can this be build in non build up area.

From:
Lucy Holloway

Sent:
27 February 2019 13:06

To: helen.skinner@pins.gsi.gov.uk

Subject: APP/P3800/W/18/3218965

Dear Helen,

I wanted to write to you to tell you how much I strongly object to the incinerator being proposed in Horsham.

I desperately oppose this proposal, not just in Horsham but anywhere. The devastating effects of pollution are so profound. Does it not terrify you that we have hit record temperatures yet again – 20 degrees in February?! This is not normal! I am a parent and I honestly lie awake scared for my children's future, and those of their children (if they choose to have any!) We owe it to them to project their future, not destroy it.

We have less than 12 years to dramatically reduce our carbon footprint and limit temperatures to below 2 degrees C, or we will face catastrophic consequences.

If we are running out of space for landfill then why can't we recycle previous landfill sites as our capabilities are so much better now? There needs to be more research and more effort made rather than a "lets just burn it / out of sight out of mind" strategy.

This facility cannot even demonstrate that it will self-sufficiently manager the transfer, recycling and treatment of waste within Waste Sussex!

Please, I implore you, do whatever is in your power to stop this appeal once and for all.

"We are the first generation to know we are destroying our planet and the last one that can do anything about it"

Kind regards Lucy Holloway

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From: Nick Holloway

**Sent:** 04 March 2019 20:50

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

### Dear Helen

I'm extremely worried and saddened that this incinerator project may go through. It would be so destructive to the surrounding area and one the residents of Horsham do not want.

With the current outlook on climate change looking bleak, this is just another planet killer in the pipeline!! It is also one that is not needed!

I ask you to add this email to your case against the incinerator.

Many thanks

Nick Holloway

21 Trafalgar rd Horsham RH12 2QD

Sent from my iPhone

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR ADRIAN HOLMES	
Address	78 Pondtail Road HORSHAM RH12 5HR	
ABOUT YOUR COMME	NTS	
In what capacity do you	wish to make representations on this case?	
☐ Appellant		
☐ Agent ☑ Interested Party / Per	rson	
☐ Land Owner		
☐ Rule 6 (6)		
What kind of representat	tion are you making?	
☐ Final Comments ☐ Proof of Evidence		
☐ Statement		
☐ Statement of Commo		
<ul><li>✓ Interested Party/Pers</li><li>□ Other</li></ul>	on correspondence	

## YOUR COMMENTS ON THE CASE

I object to the proposed new incinerator for several reasons. I believe much more should be done to recycle "waste". It is all too easy simply to dump unwanted items into a bin and let someone else cart it away to a different location to burn it it. We have enough heavy traffic and pollution around here as it is, and it is only going to get worse with the planned new developments. Air polluted by traffic fumes has been very much in the news recently because of the realisation of the serious detriment it has on the health of the more vulnerable members of our society, and we should be doing all we can to reduce this and not add to it. Our local roads already have enough traffic using them, carting in waste from other areas will put further pressure on the system, creating more congestion and significantly more wear and tear on surfaces leading to potentially unsafe conditions. North Horsham is a pleasant area. It has already absorbed much new building as new estates have encroached on the country side. This facility will seriously detract from the attractiveness of the area, and given that the need for additional incineration capacity has not been demonstrated, the proposed application is totally unnecessary.

## **Jane Moseley**

From: Matthew Horne

**Sent:** 04 March 2019 23:59

To:helen.skinner@pins.gsi.gov.ukSubject:App/p3800/w/18/3218965

I am writing to lodge my disapproval of the planned incinerator in north Horsham. The town is going to have 2500 new homes and a school situated right next to where the incinerator will be built. Unless you want a class action law suit in 20 years time from all of the sick kids being postponed by fumes you must block this incinerator.

Matthew Horne

Sent from my mobile

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## Jane Moseley

HDNC Clerk, Sara Doy <denneneighbourhoodclerk@gmail.com> From: Sent: 18 February 2019 12:03 helen.skinner@pins.gsi.gov.uk To: Cc: Trudie Mitchell APP/P3800/W/18/3218965 - Britaniacrest Recycling Ltd **Subject: Attachments:** WSCC.015.18.NH Objection from HDNC.docx Dear Helen Horsham Denne Neighbourhood Council stands by our original objection (see attached letter). In particular HDNC objects to the proximity of the proposed facility to the permitted North of Horsham development (now taken over by Legal & General from Liberty). We are very concerned that vehicle movements will be going through the housing estate and the possible effect of pollution on the residents. Although we realise there is no request to increase the number of vehicle movements to the recycling facility the extant number now appears excessive in view of the additional traffic movements that will result from the North of Horsham development. There will be many extra vehicle movements resulting from normal residential activities, and vehicles accessing the development to reach commercial premises, schools, and the new railway station (if agreed); this additional traffic will impact severely on an already overstretched local road system. HDNC also considers that the development would have an unacceptable impact on the landscape and visual amenity of the area. Regards Sara Doy Clerk to Horsham Denne Neighbourhood Council This email has been scanned by the Symantec Email Security.cloud service.

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Helen Skinner
The Planning Inspectorate
Room 3/J
Temple Quay House
2 The Square
Bristol
BS1 6PN

WSCC WSCC/015/18/NH

ref:

Your ref: APP/P3800/W/18/3218965

Email: matthew.porter@horsham.gov.uk

Contact 01403 215561

Tel:

Date: 28 January 2019

Dear Ms Skinner

Re: APP/P3800/W/18/3218965 -

Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD

I write further to your notification inviting additional comments on the appeal.

Horsham District Council (HDC) Town Planning and Environmental Health Officers note the appellant's seven grounds of appeal and have carefully reviewed and considered all the appeal documentation including the Statement of Case.

I can confirm the position of HDC remains as set out in our letter 1<sup>st</sup> May 2018, which was the Council's response as a consultee to planning application WSCC/015/18/NH. I attach this for your information.

On the basis of the information submitted at appeal, HDC continues to retain some reservations over the impact of the proposed facility in terms of air quality, landscape impact and the potential impact on the North Horsham development. These include:-

- Considerable concern from residents living in Horsham District about the potential adverse effects on health from incinerating waste and the relevant statutory bodies should seek to address those concerns. The Environment Agency and West Sussex County Council both have roles to play in relation to air quality, which should include detailed and criterial appraisals of the health impacts of the facility to reassure the public that their concerns are being fully addressed.
- HDC still has some concerns about the visual impact from certain locations, although it is
  accepted that the proposal has been sufficiently amended so that HDC could not substantiate
  planning reasons to object to the proposal but ultimately it is for the decision maker to satisfy
  themselves on weighing these impacts against the public benefits.
- Sufficient regard should be had for receptors in the development of Land North of Horsham, which involves the realignment of Langhurstwood Road which means the main access to this site will be through the residential part of the land north of Horsham development and this is a concern.

It will be essential for all of these matters to be suitably addressed and/or controlled by way of planning conditions or through the Environmental Permit procedures, if the appeal were allowed.

In particular, it is essential that conditions are attached which limit the number and times of trips and routes used by heavy goods vehicles accessing the site, secure a high-quality level of finish and landscape improvement, provide considerable mitigation of the negative visual impact, ensure air quality is protected, and that any noise impact of the facility is appropriately minimised and managed.

Yours sincerely

DCCC

Barbara Childs

Director of Place



Sam Dumbrell West Sussex County Council County Hall Chichester West Sussex PO19 1RH

Our ref:

NC/18/0010

Please ask for:

**Matthew Porter** 

Email:

Matthew.porter@horsham.gov.uk

Contact Tel:

01403 215561

Date:

1st May 2018

Dear Sam Dumbrell,

# Recycling, recovery and renewable energy facility and ancillary infrastructure Britaniacrest Recycling Secondary Aggregate Plant Warnham Brickworks Langhurst Wood Road

I refer to the consultation received by Horsham District Council (HDC) on 16<sup>th</sup> March 2018 for a proposed Recycling, Recovery and Renewable Energy facility at the above site.

The planning application is a resubmission of a previous application submitted to West Sussex County Council (WSCC) and to which HDC raised objection (WSCC/062/16/NH refers). This objection focused, principally, on:-

- · environmental protection, in particular air quality and noise
- landscape impact (including the setting of heritage assets)

Warnham Brickworks is located within the northern part of Horsham District. There are a number of receptors within a few miles of the site which includes the properties of 11 Station Road, Graylands Lodge and Bramblehurst, Langhurst Moat, and Wealdon. The northern boundary of the market town of Horsham is some 830 metres to the south. The A264 runs close to the south of the site. The railway line demarks the west boundary.

Given the location of the site within the district and the previous objection raised, HDC has responded to the consultation by submitting the following representation, which is ordered in subject of concern.

Sufficient regard should be had for receptors in the development of Land North of Horsham. This strategic site allocation has planning permission and is expected to provide 2,750 dwellings, a business park and other associated facilities including but not limited to primary schools, a secondary school and sports and recreation uses. The North Horsham development involves the closure of Langhurstwood Road left in / left out junction onto the A264 and re-alignment of the Langhurstwood Road to the east with a new roundabout junction on the A264. This re-alignment of Langhurstwood Road would mean the main access to this site will be through residential parts of the North Horsham development and this is a concern.

## **Environmental Protection**

In the previous application, the submitted information did not adequately demonstrate that the proposal would not lead to unacceptable levels of noise emissions or impacts upon air quality. Amongst other things, HDC requested that the modelling include a receptor location to mimic future

residential properties in the development of Land North of Horsham (planning application DC/16/1677 refers).

There is considerable concern from residents living in Horsham District about the potential adverse effects on health from incinerating waste and the relevant statutory bodies should seek to address those concerns. The Environment Agency (EA) and WSCC both have roles to play in relation to air quality, which should include detailed and criterial appraisals of the health impacts of the facility to reassure the public that their concerns are being fully addressed.

It is noted the applicant will be required to apply for an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016 to operate a regulated facility of this nature and the EA is the relevant regulator. During the permit application process, consideration of the health effects from the facility will be necessary and we understand that the Director of Public Health at WSCC, and Public Health England will be consulted. The permit itself will need to set out strict operating requirements which must be complied with and this will include a series of monitoring obligations. Thus if the permit conditions are breached, this will be signaled to the regulator and the operator will be held to account and required to ensure the site is compliant.

## Air Quality and Odour

Provided the facility is constructed and run entirely in accordance with the specifications given in the air quality assessment, HDC Environmental Health now raises no objection against the development. It is therefore recommended that a condition is imposed with regard to the throughput to limit it at approximately 180,000 t/yr as this assumption was used to assess the air quality impacts.

The proposed facility is located in the vicinity of an area secured for a large residential development of 2,750 houses. It is essential that the management of the facility adheres to the permit requirements and complies with the process assumptions used in the air quality assessment.

The air pollution control system will form an integral part of the Energy from Waste facility and will ensure the plant complies with the requirements of the Industrial Emissions Directive, as demonstrated by the detailed air dispersion modelling undertaken.

The National Planning Policy Framework in para 122 states that in making planning decisions a local planning authority should assume that the Environmental Permitting regime will operate effectively. Therefore we assume this to be the case and expect the following matters to be included in the Environment Agency's regulation of the 3Rs facility:

- The stack dimensions to be based on robust air quality assessments for all relevant pollutants as demonstrated by the detailed air dispersion modelling undertaken and to have regard to the proposed development at the land North of Horsham.
- Independent monitoring of the facility to ensure it meets the permit requirements.
- Independent auditing of the site and process management.
- Details of the monitoring programme shall be provided for the Environment Agency's approval before the development commences.
- We expect that the monitoring sampling will include dioxins, carbon monoxide, VOCs, metals, NOx, particulates (including PM10 / PM2.5 fractions) and odour, with special emphasis given to dioxins, PAHs and arsenic.
- We expect the details of the process management will be provided for the Environment Agency's approval before the development commences and details of the total tonnages of Municipal Solid Waste and Commercial and Industrial Waste delivered to and processed within the application site and the total quantities of metals, incinerator bottom ash and other recovered materials exported from the application site will be submitted annually to the appropriate authority (Environment Agency or WSCC).

Finally a Construction Phase Mitigation Plan should be submitted for the planning authority's review and approval before construction commences. The Plan should include provision for dust deposition monitoring.

## **Noise**

HDC Environmental Health now accepts the submitted assessment methodology and baseline conditions. The assessment indicates noise from the facility will have very low impact on existing noise levels at the site. In fact the only change in the ambient levels as a result of the facility's operation will be at one of the assessed receptors (11 Station Road) during the night-time and this will be by only 1 dB which will be imperceptible.

It is noted that the applicant has offered a post-completion, pre-operational condition for a noise assessment in accordance with the relevant British Standard, to provide assurances that the built facility will meet the expectations stated in the submitted noise assessment:

"The plant will be designed such that the rating level LAr,Tr of the noise emitted from it shall not exceed the existing representative background sound levels LA90,T (as provided in the Environmental Statement), by more than 3 dB during the appropriate time period at the nearest noise sensitive receptors. The assessment shall be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound'. Noise monitoring will be carried out post completion to ensure that the operational plant complies with the design requirement presented in this condition. The monitoring procedure will be discussed and agreed with the case officer at WSCC (and/or their consultee on noise) in advance."

If the application is approved, it is considered essential that this condition should be attached.

## Landscape and Heritage Asset impacts

In the previous application HDC objected on the grounds of the harmful landscape impact arising from the height and bulk of the proposed facility, including its stack. The proposed structures would encroach into views and detract from the character of the landscape, including the Surrey Hills ANOB. The conclusions of the submitted Landscape and Visual Impact Assessment was also disputed, in regard to the Upper Arun Valley and Faygate and Warnham Vale Landscape Character Areas and the Ancient Monument of Graylands Copse. In addition the mitigation failed to take opportunities available to include woodland planting to assist in reducing the visual impact.

It was suggested previously that an incinerator building of a reduced scale and height, with a softer, less angular form would better integrate into the landscape.

In the current application, the reduction of the overall height of the building is noted and is an improvement. The building bulk has been slightly reduced or streamlined with the roof hiding most of the different blocks. As a result the overall composition looks cleaner and improved. The arched roof over the overall structure assists in creating a less imposing structure. The building is now generally well screened and considered to sit more comfortably with the surroundings as it sits within the existing tree line when appreciated from closer and medium range views. Three colour options have been put forward from a palette development for the High Weald Area of Outstanding National Beauty Colour Study. The proposed muted colour scheme will aid the building to more readily blend in, including on longer range views such as the Surrey Hills AONB. Based on this and the photomontages provided (viewpoints) the softer curved lines of the curvilinear design will help to better integrate the building into the landscape. Low level elements and site activity will be screened by the additional proposed planting within the site boundaries which also contribute to the landscape characteristics of the area and to connect the site to the wider landscape. Whilst this is welcomed, a native deciduous hedgerow species such as hornbeam (which holds its leaves through winter) would be considered more appropriate to the setting than the photina red robin. All of these factors positively contribute to the reduction of the overall harm of the development to wider landscape character and visual amenity although the size of the building and stack mean it will be visible and this impact will need to be fully assessed in comparison to the benefits of the proposal.

The height of the chimney stack in particular remains a concern and will be seen from afar. Not surprisingly, the additional representative viewpoints, only confirm that views of the stack will be generally available from close, medium and long range due to its height. The chimney stack would

still be a significant physical feature in the landscape and wider countryside. The clarifications provided by the applicant on the height of the stack have been read and it is understood that ultimately it will be the Environment Agency permit regime that dictates the height. Nevertheless, if the permit regime allows for a reduced stack height this should be explored further to reduce the visual impact. It is recognised that there will always be harm arising from the stack due to its size and impossibility to fully mitigate the effect of such a structure, however, it is acknowledged that the nature of the development requires the stack and therefore the harm should be taken into account in the planning balance and judged against the public benefits of the proposal.

Some medium to long distance views are available into the site, due to the rise in the topography and large size of the building, however these are not considered significant for the Environmental Statement purposes. Additional viewpoints have been provided to illustrate views from the A24 (viewpoint 13). The users of the A24 will travel at a fast pace and their primary attention is on the road not the landscape, therefore this is likely to be not significant for the purposes of the Environment Statement.

Along Station Road, Warnham (viewpoint 14), the proposed building is clearly visible from this public footpath and no doubt will result in visual harm to the users of the footpath, however, it is accepted that the proposed height which sits within the existing skyline and muted colours of the building integrate it better within the landscape and the harm is likely to be not significant for the purposes of the Environment Statement. Within the site, this view may benefit from additional planting to further mitigate the visual harm.

From the High Weald AONB (viewpoint 4) the stack and building are in the centre of the view. Whilst this is considered to affect the view, due to distance and the future North Horsham Development the change will not be considered significant for the purposes of the Environment Statement.

Only the stack is visible from the footpath view west of Morris Farm (viewpoint 27). Although this will no doubt introduce an uncharacteristic element to the landscape and result in a negative effect to the landscape character and visual amenity, these will need to be assessed on balance and against the public benefits of the proposal.

In terms of heritage impact, it is considered that less than substantial harm would arise to the setting of surrounding heritage assets, which include the setting of the moated scheduled Ancient Monument of Garylands Copse which lies approximately 265m to the east of the side, just to the eastern side of Langhurstwood Road; the Grade II Listed Westons Place, Dorking Road, Warnham and The Granary, Station Road, Warnham lie approximately 750m to the south west of the site; the Grade II Listed Holbrook Park lies roughly 1.25km to the south east of the site; and, Warnham Conservation Area which lies approximately 1.15km to the south west. In accordance with paragraph 134 of the NPPF this harm is required to be balanced against the public benefits of the development.

Therefore, although the Council still has some concerns about the visual impact from certain locations, it is accepted that the proposal has been sufficiently amended so that this Council could not substantiate planning reasons to object to the proposal but ultimately it is for the decision maker to satisfy themselves on weighing these impacts against the public benefits.

## Traffic

It is noted that the potential impacts of traffic generated by the proposal have been assessed. Heavy goods vehicles, including during the construction phase, are likely to be drawn from a wide area concentrated on the primary road network, including the A24 and A264, therefore it will have traffic impacts in Horsham District, including re-alignment of Langhurstwood Road. The impact of this would mean the main access to this site will be through housing in the North Horsham development and WSCC should have particular regard to this, as well as the wider impact of heavy goods vehicle movements when considering the application, as this will be a considerable impact for existing and new residents.

## Conclusion

HDC acknowledges that the site is allocated for the proposed use, however on the basis of the information submitted the Council retains some reservations over the impact of the proposed facility in terms of air quality, landscape impact and the potential impact on the North Horsham development. However, while the Council does not believe that these are sufficient enough to formally object to the application on material planning grounds, it will be essential for all of these matters to be suitably addressed and/or controlled by way of conditions or through the Environmental Permit procedures, if permission is granted. In particular, it is considered essential that conditions are attached which limit the number and times of trips and routes used by heavy goods vehicles accessing the site, secure a high quality level of finish and landscape improvement, provide considerable mitigation of the negative visual impact, ensure air quality is protected, and that any noise impact of the facility is appropriately minimised and managed.

Yours sincerely,

Dr Chris Lyons

Director of Planning, Economic Development & Property

## Jane Moseley

**From: Sent:**03 February 2019 16:36

**To:** Skinner, Helen

**Subject:** Re: Appeal Reference (APP/P3800/W/18/3218965) - Proposed Recycling Facility at

Langhurstwood, Horsham, RH12 4QD.

Attachments: Horsham Society - incinerator - 03.02.19.docx; Horsham Society - incinerator -

19.01.17.docx; Horsham Society - Incinerator - 08.06.17.docx; Horsham Society -

incinerator - 30.04.18.docx

Dear Ms Skinner,

Horsham Society wish to maintain their objections to the proposals for an Incinerator on the former Wealden Brickworks site at Langhurstwood, Horsham, RH12 4QD, which have been previously submitted to West Sussex County Council. Accordingly I enclose a covering letter from Horsham Society, dated 03.02.19 and copies of letters to which it refers, dated: 19.01.17, 08.16.17 and 30.04.18.

Yours sincerely,

David Griffiths. (secretary to the Horsham Society Planning Sub Committee)

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Tel: 01403 264548.

Horsham Society,
82 Worthing Road,
Horsham,
West Sussex,
RH12 1TD.

3rd February 2019.

Helen Skinner,
The Planning Inspectorate,
Room 3/J,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN.

Dear Ms Skinner,

Re: Appeal Reference: APP/P3800/W/18/3218965 - Britaniacrest Recycling Ltd.

Thank you for your email of 17th January 2019, advising that the appeal in respect of the proposed Recycling, Recoverable and Renewable Energy Facility and Ancillary Infrastructure, to be sited at the former Wealden Brickworks site, in Langhurstwood Road, Horsham, RH12 4QD is to be determined through the enquiry procedure.

Horsham Society have previously submitted written objections to these proposals on the 19.01.17, 08.06.17 and 30.04.18 and copies of these letters are attached.

We maintain our objection to this application, based upon the content of the above mentioned letters.

yours sincerely,

David Griffiths. (secretary to Horsham Society Planning Sub Committee) encs: correspondence dated 19.01.17, 08.06.17 and 30.04.18

Tel: 01403 264548.

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)

Tel: 01403 264548.

Horsham Society,
82 Worthing Road,
Horsham,
West Sussex,
RH12 1TD.

8th June 2017.

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

Dear Sirs,

Re: Proposed Incinerator - Planning Application WSCC/062/16/NH (further information submitted).

On behalf of Horsham Society I am writing in respect of the further information lodged by the applicant in respect of Planning Application WSCC/062/16/NH. The information provided does not serve to alter our views on this application. We therefore maintain our objections, as detailed in our letter of objection, dated 19th January 2017, a copy of which is attached.

We therefore object to Planning Application WSCC/062/16/NH.

Yours faithfully,

David Griffiths. (Secretary for Horsham Society Planning Sub Committee)

Tel: 01403 264548.

Horsham Society,
82 Worthing Road,
Horsham,
West Sussex,
RH12 1TD.

19th January 2017.

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

Dear Sirs,

Re: Proposed Incinerator - Planning Application: WSCC/062/16/NH

On behalf of Horsham Society I wish to lodge an objection to Planning Application WSCC/062/16/NH, to locate and construct an Incinerator on land off Langhurst Wood Road, North of Horsham. Whilst we appreciate such facilities are required for the disposal of waste and that emissions from such a plant will be strictly controlled by EU legislation, this particular application raises a number of concerns.

The proposed site is immediately North of the town of Horsham and will also be adjacent to the newly proposed 'North of Horsham' major development, which will comprise some 2750 houses, plus commercial facilities.

The proposed facility will have the capacity to process some 230,000 tonnes of waste per annum. This would be delivered to the Incinerator by road, involving some 101 vehicular movements per day. Additionally, recycled materials and those which cannot be recycled would be removed from the site, involving a further 142 vehicular movements per day exporting the materials from the site. Whilst the total of 243 vehicle movements per day is less than the current movements approved for the Waste Transfer Site presently sited at this location, access to the Incinerator would be on residential roads, being through a proposed residential section of the 'North of Horsham' development. This would be totally unacceptable, due to the sizing of the roads being inappropriate for commercial vehicles, the presence of odours from untreated waste, the vehicles being a danger to pedestrians and creating noise pollution.

The overbearing nature of the facility on the surroundings gives rise for concern, being some 50 metres in height (some 18 storeys high). Consideration should be given to reducing the impact by constructing an element of the building below ground level. Furthermore the proposed chimney is some 95 metres high and fitted with aviation warning lights. The massing of such a facility is totally inappropriate for this location.

Whilst we are pleased with the proposals that the plant would generate some 21 megawatts of electricity, of which some 18 megawatts would be available for export to the local distribution network, little consideration has been given to the export of heat from the steam turbine which would drive the electricity generator. Consideration should be given to distributing this surplus heat to the adjacent brickworks or to utilise in a district heating system for the proposed Liberty development at North of Horsham.

Due to the location of the proposed Incinerator, the massing of the building and chimney and the proposed routing of vehicles through residential areas, we therefore consider the Langhurst Wood Road site to be a totally inappropriate location for this facility and therefore object to Planning Application WSCC/062/16/NH.

Yours faithfully,

David Griffiths. (secretary to the planning sub committee)

For official use only (date received): 03/03/2019 21:40:54

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349

1RS DEBORAH HUGHES
110 DEDGIO III 110 GILEG
57 Old Guildford Road
Broadbridge Heath
HORSHAM
RH12 3JY
3 I

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

### YOUR COMMENTS ON THE CASE

#### Dear Ms skinner

I am writing to you regarding the above appeal lodged by Britanniacrest, who want to build an incinerator on the outskirts of our town.

I am totally opposed the the plans on all grounds, and feel that it would be detrimental to the health and well-being of my family. I have two small children who attend a village primary school a short distance for the prosed site and it will undoubtedly be affected by the pollution caused by burning rubbish so close to it. My daughter suffers from asthma and we chose the village school particularly to be away from busy roads. A fact that would be completely negated by an industrial unit pouring smoke into the region.

Furthermore, having lived in Horsham all my life, we recently moved out to the village of Broadbridge Heath because traffic gridlocks were so bad in getting out of the town in the morning. The increased hgv traffic caused by the site would make the roads around the outskirts of Horsham grind to halt. As I drive the same route everyday that they would take to get to it, I know that this would be the case, no matter what the 'traffic assessment' says. It already takes half an hour to go a few miles, how can the increase in traffic possibly not have a grid locking effect?

Furthermore I do not believe that the commercial burning of rubbish for sussex and the surrounding counties should be something that is done so close to a thriving market town, which is ever growing and promoted as suitable for families to settle in.

This is a terrible plan which would forever change the nature of our town, would make it a horrible place to live and be bad for our health. Please do not approve it, it should not happen here, or anywhere as we should be focusing on reducing rubbish not just burning it.

Please reject this plan, and protect the health and well-being of the people of horsham.

For official use only (date received): 30/01/2019 12:36:23

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CAS	E
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	
Name	MR PAUL HUGHES
Address	17 Lemmington Way HORSHAM RH12 5JG
ABOUT YOUR COMME	NTS
In what capacity do you	wish to make representations on this case?
<ul><li>□ Appellant</li><li>□ Agent</li><li>☑ Interested Party / Per</li><li>□ Land Owner</li></ul>	rson
□ Rule 6 (6)	
What kind of represental  Final Comments	aon are you making?
☐ Proof of Evidence	
<ul><li>☐ Statement</li><li>☐ Statement of Commo</li></ul>	n Ground
<ul><li>✓ Interested Party/Pers</li><li>□ Other</li></ul>	on Correspondence

### YOUR COMMENTS ON THE CASE

Dear Sir/Madam

In light of the appeal to overturn the planning application for the Incinerator at the Langhurst Rd site I enclose my original objection below.

To reinforce it -This is a wholly inappropriate solution for three reasons :

- 1) The 95m chimney will deposit potentially dangerous particulate products of combustion on north Horsham including the recently approved development on the north side of the bypass which includes homes and schools. This is due to the fact that the prevailing wind direction is westerly for 70% of the time
- 2 ) At 95m the chimney is a blight on the landscape
- 3 ) This incinerator could be acceptable with some other means of getting rid of the products of the combustion eg filtration and disposal

Yours sincerely

Paul Hughes

17 Lemmington Way Horsham RH12 5JG

Dear Sir / Madam,

I wish to object to the new Brittaniacrest application for the waste treatment plant in Horsham

May I start by saying that I am in favour of alternatives to landfill but this proposal is in the wrong place given that the gaseous exhaust is emitted upwind of residential areas

My objection is primarily that with the prevailing wind being westerly for 70% of the time ,particulates in the exhaust will be deposited on residential areas which include the recently approved development in north Horsham.

It seems to me that if an immensely tall chimney is required there must be a reason and that is probably for dispersal of potentially harmful particulate waste .If however the wind is light , that particulate waste will be deposited on residential areas.

It also has to be said that a 95m high tower is indubitably an eyesore.

As I previously said ,I am in favour of alternatives to landfill but this proposal is unsafe technology in the wrong place.

Yours sincerely,		
Paul Hughes		



# **North Horsham Parish Council**

Roffey Millennium Hall, Crawley Road, Horsham, West Sussex, RH12 4DT **Tel:** 01403 750786 (Office & Hall Bookings) Roffey Millennium Hall, North Heath Hall HolbrookTythe Barn

Email: parish.clerk@northhorsham-pc.gov.uk

Website: www.northhorsham-pc.gov.uk

Helen Skinner
The Planning Inspectorate
Room 3/J
Temple Quay House
2 The Square
Bristol
BS1 6PN

5<sup>th</sup> February 2019

Appeal Reference APP/P3800/W/18/3218965

Planning Application WSCC/015/18/NH - Recycling, Recovery and Renewable Energy and Ancillary Infrastructure at the former Wealden Brickworks, (Site HB) Langhurstwood Road, Horsham, West Sussex, RH12 4QD. Planning Application submitted by Britaniacrest Recycling Ltd.

The Parish Council objects to the appeal on the same grounds as were stated in the letter to West Sussex County Council (WSCC) dated 6<sup>th</sup> February 2017. However, since then Horsham District Council (HDC) has approved a planning application for residential, community and business land use on a site adjacent to the proposed waste facility and Gatwick Airport has put forward plans for development. The Department of Environment, Food and Rural Affairs (DEFRA) has published its Clean Air Strategy and the National Planning Policy Framework (NPPF) has been revised.

The land on which the proposed Incinerator is to be sited was allocated for "waste use" in Horsham District's Local Plan in 2007. As a result, in 2014, the site was included in the WSCC Waste Local Plan. Subsequently in 2017 HDC approved a plan for 2,750 dwellings, a senior school and two primary schools, community facilities and a business park on land adjacent to an area that had clearly been identified by both Councils for processing waste and where the prevailing south westerly winds would take emissions, smells and any other airborne particles directly overhead. Between the two Councils the community of North Horsham parish has been badly let down.

The Parish Council question the need for an incinerator for commercial and industrial waste originating from West Sussex when the waste facility currently on the site has the capacity to receive 230,000 tonnes of waste per annum, but the total tonnage processed was significantly lower at 132, 375 tonnes in 2018. It would make commercial sense to run the operation to capacity, but that implies that commercial and industrial waste will come from areas outside of West Sussex. HM Government launched the 'Clean Grown Strategy – leading the way to a low carbon future' in October 2017 (amended April 2018) that sets out government targets to 2050. This includes putting in place measures to divert more food waste from landfill, work with industry to achieve greater levels of recycling, improve the utilisation of food and biowaste and incentivise activities such as reuse, repair and remanufacturing. There has already been an increase in recycling in the UK from 2000/01 when 11% of household materials were recycled to

44% in 2015/16. Investment into new ways of recycling, new materials, products and processes promises to enable more recycled materials to be reused, reducing carbon emissions. The initiatives are set in place locally through West Sussex County Council and Horsham District Council both of which are very proactive in initiatives which reduce waste. As a result of the reduction in waste, less Refuse Derived Fuel (RDF) will be produced and there will be less to be burnt in incinerators. If an incinerator is built on the Langhurstwood site there is not likely to be sufficient RDF generated in West Sussex to feed the incinerator and this may give the scope to bring in RDF from further afield and again increase road traffic, pollution and litter on the surrounding roads as well as create a nuisance for local residents.

Increasing the capacity of the waste facility has knock on effects in terms of emissions and air quality. The planning application doesn't seek to increase the traffic movements currently allowed to and from the site. Currently there is permission for a maximum of 142 HGVs entering/leaving the site each weekday and 70 HGVs entering/leaving the site on Saturdays. This makes a total allowance of 79,132 per year. In 2018 there were 36,278 movements which is less than half those than can be allowed. When at capacity the impact of lorries in terms of noise and emissions will be significantly increased. DEFRA, in its Clean Air Strategy 2018 reminds us that "particulate emissions from non-exhaust sources produced as a result of the friction required for breaking and maintaining traction on the road are harmful to human health and the environment. It is also a source of microplastics in the ocean." The effects of emissions from diesel engines on air quality are equally of concern.

The development north of the A264 and other developments being built in and around Horsham will significantly impact on the level of traffic using the local road network, especially the major roads leading towards to the site. Plans to signalise major road junctions will slow down traffic and cause vehicles to queue. The cumulative effect of additional traffic on air quality hasn't been taken into consideration.

Permission has been given to re-route traffic from the A264 to Langhurstwood Road though an area of new housing on the north of Horsham development. This potentially means up to 142 HGVs every week day and 70 HGVs on a Saturday passing through a residential area to a roundabout which then joins to Langhurstwood Road. Whilst the masterplan design for the new housing development shows trees along the route, this will not reduce the noise and smell from HGVs accessing and exiting the site.

In the mid 1990s West Sussex County Council and British Airports Authority had a moratorium on the building of a second runway at Gatwick until after 2019. The recent Gatwick Masterplan consultation ended in January 2019 to coincide with this date. The Gatwick Masterplan contains several options for development and expansion of the airport to enable more air traffic movements. The Parish Council had no objection to this, recognising that development provides employment for local people. However, the Parish Council had previously expressed concern that no consideration had been given to the effect that air traffic movements may have on the emissions from the incinerator chimney. Turbulence created by aircraft may drive the fine particulate emissions from the chimney down to the ground. Increased air traffic movements will exacerbate this issue. The Parish Council continues to recommend that a study be commissioned to seek professional advice on the effects of turbulence created by passing aircraft on the emissions.

The Parish Council has been advised that to accommodate a facility of this type requires a site of 4 hectares. The site on Langhurstwood Road is 3.8 hectares and therefore falls short of the recommended footprint.

In conclusion, North Horsham Parish Council considers that the application contravenes the environmental ethos of sustainable development outlined in the revised NPPF 2018 also WSWLP (2014) Policy W12 and Policy W19. An incinerator running at full capacity would have serious implications in terms of vehicle congestion, a deterioration of air quality in and around Horsham and especially on the residents and children living and going to school on the new development north of Horsham.

The incinerator has generated considerable interest from residents of North Horsham and our neighbouring parishes and therefore North Horsham Parish Council requests that the Inquiry is heard at a venue of substance close to Horsham where there is sufficient capacity where those who want to attend to do so comfortably.

Yours sincerely

Pauline Whitehead BA(Hons) FSLCC Clerk to the Council

From: Jade Stevens

**Sent:** 04 March 2019 19:37

To:Helen.skinner@pins.gsi.gov.ukSubject:Ref: APP/P3800/W/18/3218965

## Hello

Im emailing you about the incinerator possibly being built in Horsham.

Ref: APP/P3800/W/18/3218965

I have lived in Horsham for the last 4 years, I consider it a lovely town to bring my kids up in.

I am extremely upset with the possibility of an incinerator being built here, my children live here and I would be looking to move away as I do not want them breathing in whatever fumes it will be burning out so close to Horsham. The traffic in and around Horsham is already a nightmare and I can only imagine how much worse it will get with all the lorries and workers coming from far and wide.

Please can it be reconsidered, we do not need it and the impact it will have on the environment will be terrible, we do not need to add to global warming.

Thank you for your time Jade stevens

# Jane Moseley

From: Sent: To: Subject:	Richard Jasper 21 February 2019 12:34 helen.skinner@pins.gsi.gov.uk Incinerator at Wealdon Brickworks, RH12 4QD Sussex County Council's planning register (reference WSCC/015/18/NH)
Helen Skinner, The Planning Inspectorate, Room 3/J, Temple Quay House, 2 The Square, Bristol BS1 6PN	
Dear Ms Skinner	
	mer Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD. West ng register (reference WSCC/015/18/NH)
would like to object to the prop	posed incinerator by Britaniacrest for the following reasons:
<ol> <li>Pollution and air qu</li> <li>Extra traffic in area</li> <li>Visual impact</li> </ol>	ality
Yours sincerely	
Richard Jasper	
Sent from <u>Mail</u> for Windows 10	
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Name

Address

# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

MR CHRISTOPHER JENKINSON

Oakhurst
Pondtail Drive
HORSHAM
RH12 5HY

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
✓ Interested Party/Person Correspondence
□ Other

## YOUR COMMENTS ON THE CASE

This incinerator will effect the health of the people in Horsham and the surrounding area detrimentally. The huge number of lorries will add to the existing pollution and the incinerator will release toxic fumes into the atmosphere. All the claims that it is safe can't be proved in the long term. Anything coming out of a chimney is contributing to pollution and the eventual early death of more people. Please reject it on health grounds as I am sure you would not want it near your home.

Please let common sense prevail as this sort of facility should be nowhere near a town. In this case a new housing estate will be built over the next 10 years next door to it.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE	
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349

SENDER DETAILS	
Name	MRS CATHERINE JOHNSON
Address	4 Plough Lane
	Horsham
	Horsham West Sussex
	RH12 5TN

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
□ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
□ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence

Other			

## YOUR COMMENTS ON THE CASE

I would like to register my concern at the proposed installation of an incinerator in North Horsham. I am concerned that the potential environmental and health impacts of an incinerator are not fully understood and by going ahead, there is a risk to those living in the local area and the environment in general. From an aesthetic perspective, the incinerator will tower over the landscape and will not be in keeping with the area around it, even after the North Horsham housing/suburban development has completed.

## **Jane Moseley**

From: Tracy Jones

**Sent:** 04 March 2019 16:05

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

## Hello

I wish to object to the incinerator proposal. It is going to be too close to residential areas particularly as there is now due to be a school built very close. I feel it will be detrimental to the health of those living nearby and going to school nearby. The children need clean air not polluted air.

Kind regards Tracy Jones

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE C	CASE
Appeal Reference	APP/P3800/W/18/3218965
Appeal By	BRITANIACREST RECYCLING LTD
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349
SENDER DETAILS	

# Name MRS LOUISE KEMP Address 128 Brighton Road Horsham UK RH13 6EY

ABOUT YOUR COMMENTS					
In what capacity do you wish to make representations on this case?					
☐ Appellant					
□ Agent					
☑ Interested Party / Person					
☐ Land Owner					
□ Rule 6 (6)					
What kind of representation are you making?					
☐ Final Comments					
☐ Proof of Evidence					
☐ Statement					
☐ Statement of Common Ground					
☑ Interested Party/Person Correspondence					
□ Other					

## YOUR COMMENTS ON THE CASE

I am greatly concerned by the impact this facility will have on the air quality of Horsham and the surrounding areas. Given that so many children now have asthma, I can see far more children requiring treatment and hospital care if this facility is allowed. Additionally, with many elderly people suffering from lung conditions, a reduction in air quality would be putting more of a burden on our over-stretched NHS. I strongly believe we should be doing far more to recycle our waste rather than burn it and with the ever increasing temperatures, set to continue, we should be looking for any ways of halting climate change, not accelerating it.

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# The Planning Inspectorate

# COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE					
Appeal Reference	APP/P3800/W/18/3218965				
Appeal By	BRITANIACREST RECYCLING LTD				
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349				
SENDER DETAILS					
Name	MR ROGER KENDELL				
Address	6 Dale Close HORSHAM RH12 4JD				
ABOUT YOUR COMMENTS					
In what capacity do you wish to make representations on this case?					
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)					
What kind of representation are you making?					
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>					

Incinerating waste creates noxious gases iniquitous to health, as well as large quantities of Co2, which is the major factor in the global warming that will degrade the planet and may eventually make it uninhabitable for future generations. Composting vegetable waste and burying deep underground the products of industrial processes are some of the ways forward if we want to ensure the survival of the human race.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CAS	E CONTROL OF THE CONT	
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS CATHERINE KNOX	
Address	5 Lakeside HORSHAM RH12 2LS	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?  □ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

I object to the proposed incinerator on the grounds of concerns about substantial increases in traffic and the impact on air quality in the area.

Appeal reference number: APP/P3800/W/18/3218965

Dear Sir.

W

taken by councillors on behalf of the residents of West Sussex. The following conditions still prevail, namely:

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

I am disappointed that Britaniacrest have decided to appeal against the democratic decision

### The application is not compliant with the West Sussex County Council Waste Local Plan.

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.

As a local resident I am most concern with the adverse impact on the health of residents. Pollution of all kinds have recently been the subject of significant controversy and has triggered off actions from the government.

### 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. This development has entered its next stage by having been recently taken over by a major house builder.

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

28 February 2019

From: J C Lamberty

**Sent:** 01 March 2019 14:57

To:helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

**Attachments:** img527.jpg

To Helen Skinner,

I attach my objection letter regarding the above application.

Joseph and Barbara Lamberty

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Development.

Dalle Moseley		
From: Sent: To: Subject:	Suzanne.lanaway 01 March 2019 18:54 helen.skinner@pins.gsi.gov.uk Appeal reference number: APP/P3800/W/18/3218965	
Dear Sir,		
I am disappointed that Britania	crest have decided to appeal against the democratic	
decision taken by councillors of	n behalf of the residents of West Sussex. The following	
conditions still prevail, namely	;	
1. Non-compliance with West	Sussex County Council's Waste Local Plan.	
The application is not complian	nt with the West Sussex County Council Waste Local Plan.	
2. The size of the plot being co	onsidered in the application.	
Despite the applicant revised la	yout, it would still have a major impact on Horsham and	
its surrounding villages.		
3. Health Impact.		
As a local resident I am most co	oncern with the adverse impact on the health of	
residents. Pollution of all kinds	have recently been the subject of significant controversy	
and has triggered off actions fr	rom the government.	
4. Proximity of the proposed 1	Incinerator to potential significant Housing	

1

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. This development has entered its next
stage by having been recently taken over by a major house builder.
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
Suzanne Lanaway
1 Greenfinch Way Horsham West Sussex RH12 5HB

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR JAMES LANCASTER		
Address	4 Wagtail Close HORSHAM RH12 5HL		
ABOUT YOUR COMMENTS			
In what capacity do you wish to make representations on this case?			
☐ Appellant			
☐ Agent ☑ Interested Party / Person			
□ Land Owner			
□ Rule 6 (6)			
What kind of representation are you making?			
☐ Final Comments			
☐ Proof of Evidence ☐ Statement			
☐ Statement of Common Ground			
✓ Interested Party/Person Correspondence			
□ Other			

As a resident of North Horsham I am increasingly concerned about the impact on the environment that this incinerator will cause to the local surrounds. UI am opposed to the development

This development is in addition to the North Horsham residential development which I also have concerns about. Firstly the incinerator development will have an unacceptable impact on the beautiful surrounding area. I have lived here for 12 years and often walk up through the fields looking at the local wildlife. This walk and the visual aspect will be tarnished forever if the site gets the go ahead

I am concerned that the transport impact on the local roads (which are already overcrowded) will face additional pressure. These are local roads that already face a high number of delays and accidents and this will increase

As a parent of a young girl I remain unconvinced that the proposed incinerator would not cause additional pollution and increase the risk of health issues to her and the other young residents of North Horsham. There will be increased noise and smell pollution and the potential risk of vermin and disease will be higher due to the waste products being treated by the facility

Finally I am also not sure why we even need this facility - I have seen no data on current waste treatment capacity in west Sussex to show we need this facility.

Overall the cumulative impact of the incinerator and the North Horsham development is huge for the area. It will lower our house prices and make the area far less desirable to live in. The land North of Horsham is a beautiful part of our county and we seem to be intent on ruining it to provide homes that we don't need and waste facilities that are unproven. It is time the WSCC really started to listening to the residents of the area and protecting the beautiful surroundings that we live in

From: Jane Moseley < jane.moseley@westsussex.gov.uk > on behalf of PL Planning

Applications <planning.applications@westsussex.gov.uk>

**Sent:** 26 February 2019 09:55

**To:** Skinner, Helen

**Subject:** FW: Extended Deadline for Submissions & New Weblink: Planning Appeal

APP/P3800/W/18/3218965 - Former Wealden Brickworks)

### Comments from a third party below.

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council

Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

Email: jane.moseley@westsussex.gov.uk | Web: www.westsussex.gov.uk

From: Phypsi Phypsi [

**Sent:** 26 February 2019 09:53 **To:** PL Planning Applications

Subject: Re: Extended Deadline for Submissions & New Weblink: Planning Appeal APP/P3800/W/18/3218965 -

Former Wealden Brickworks)

May I lodge my protest about them again then please? My parents live in the Roffey/Holmbush catchment and Dad is already on oxygen and gets some respite from sitting in the garden. If this awful incinerator is built, the air quality will reduce to zero considering we've already got Gatwick on the doorstep. I've read now that this company have offered to paint their chimney in 'autumnal' colours, as if that would make difference.

### Regards Laura

On 26 Feb 2019, at 09:49, PL Planning Applications planning.applications@westsussex.gov.uk wrote:

### Laura

Yes, they have appealed the refusal of the application (they have appealed only once, to be clear).

### Kind regards Jane.

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council

Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

Email: jane.moseley@westsussex.gov.uk | Web: www.westsussex.gov.uk

From: Phypsi Phypsi

**Sent:** 26 February 2019 09:49 **To:** PL Planning Applications

Subject: Re: Extended Deadline for Submissions & New Weblink: Planning Appeal APP/P3800/W/18/3218965 -

Former Wealden Brickworks)

Jane - can you explain this to me please?

I thought we'd celebrated stopping this monster being built. Are the company now Appealing AGAIN despite this?

Thanks Laura

On 26 Feb 2019, at 09:38, PL Planning Applications planning.applications@westsussex.gov.uk> wrote:

ΑII

As you may be aware, in light of our planning application website being down, the Planning Inspectorate has agreed to extend the deadline for comments/submissions on the above appeal to 4 March.

From today, application and appeal details can now be viewed here: <a href="https://westsussex.planning-register.co.uk/Planning/Display/WSCC/015/18/NH">https://westsussex.planning-register.co.uk/Planning/Display/WSCC/015/18/NH</a>

### Thanks Jane.

### Jane Moseley

County Planning Team Manager | Planning Services | Economy, Planning, and Place Directorate | West Sussex County Council

Location: Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 22 26948

Email: <u>jane.moseley@westsussex.gov.uk</u> | Web: www.westsussex.gov.uk

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Horsham West Sussex RH12 5HZ

### The Planning Inspectorate

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR MYLES LAVING	
Address	Durfold Road	

# ABOUT YOUR COMMENTS In what capacity do you wish to make representations on this case? Appellant Agent Interested Party / Person Land Owner Rule 6 (6) What kind of representation are you making? Final Comments Proof of Evidence Statement Statement of Common Ground Interested Party/Person Correspondence Other

To Whom It May Concern,

I am writing to question the rationale for the proposal relating to the Horsham Incinerator.

In essence, my concerns are threefold:

- (a) The increased deleterious effects of an incinerator to human generated climate change.
- (b) We need to promote more of the waste management strategy of reduce, reuse and recycle.
- (c) The new development, that is due to commence, between the 264 and Capel is already going to have a significant impact on the environment.

Kind Regards,

Myles

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MS ANGELA LE ROUX	
Address	32 Sandeman Way HORSHAM RH13 6EL	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
☐ Appellant		
☐ Agent  ✓ Interested Party / Person		
□ Land Owner		
□ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence ☐ Statement		
□ Statement of Common Ground		
✓ Interested Party/Person Correspondence		
□ Other		

I oppose the plans for the incinerator in Horsham particularly with consideration to the adverse effect of transporting and dumping waste en masse into this area of natural beauty from locations outside of the area, including from (I understand) from other countries. It is a totally inappropriate site, in view of the growing population in the area where health and the freedom to enjoy the natural habitat and landscape would be considerably impeded and an imbalanced and alien landscape with the focal point of the incinerator chimney would introduced. The pollution would adversely impact the atmosphere, where the local newbuilds and established residential areas would be under the umbrella of this contamination. The wind is the wind - no-one can trap it to blow other than where it will blow. It cannot be guaranteed that the pollution will not downdraft and affect the growing residential and industrial population of Horsham and Crawley.

From: Jon Litten

**Sent:** 02 March 2019 21:48

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965 Objection to the Horsham Incinerator

Dear Ms. Skinner,

I am emailing to you to object to the appeal made by Britanniacrest for an incinerator in Horsham.

I continue to object to the incinerator on the grounds that:

- 1) The incinerator will be too close in proximity to existing housing in North Horsham and a new development that has been planned in the area.
- 2) The incinerator is planning to take commercial waste from across the South of England, and this will lead to increased HGV movements on the A24 and A264. It is not just incinerating waste from Horsham or West Sussex only.
- 3) A planed 95 metre incinerator tower will have a detrimental effect to woodland in the area and countryside.

I therefore ask that the original decision by W.S.C.C. of rejection is respected, and that the appeal by Britanniacrest is dismissed.

Yours sincerely,

Mr Jonathan D. Litten, 27 Speedwell Way, Horsham, West Sussex, RH12 5WA

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

Appeal Reference  APP/P3800/W/18/3218965  Appeal By  BRITANIACREST RECYCLING LTD  Site Address  Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD	DETAILS OF THE CASE		
Site Address  Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD	Appeal Reference	APP/P3800/W/18/3218965	
Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD	Appeal By	BRITANIACREST RECYCLING LTD	
Grid Ref Easting: 517058  Grid Ref Northing: 134349	Site Address	Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058	

## Name MISS GAIL MACKINTOSH Address 11 Station Road Warnham Horsham RH12 3SR

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

Dear Sir/Madam,

My fiancé and I recently purchased a property on Station Road, Warnham having checked before we bought that the planning application for this incinerator had been refused. We are very concerned that it has now gone to appeal and there is a risk of it going ahead.

There are numerous concerns that we have about this application:

- Impact on health. It is obvious that regardless of any mitigation measures there will be an impact on air quality. As an asthma sufferer I am particularly concerned with the introduction of additional fumes to the area and more importantly to the level of potential particulates that the tower may emit. During the last consultation Public Health England said there needed to be more thorough air quality dispersion modelling and that there needed to be confirmation of sufficient on-site procedures to prevent off-site emissions of incinerator bottom ash particulates. These additions to the original application are not included in the appeal documentation so we are obviously concerned. In addition, the increase in heavy goods vehicles in the area during construction and after will only serve to deteriorate the air quality further.
- Visual impact on our residence. The impact on our day to day living will be significant; from the construction disruption and from the final product which will loom and overshadow our property even without the 95m tower on top.
- Noise disruption. The application states that there will be a constant increased night time noise level across Station Road. We moved to be closer to the countryside and do not relish the thought of continuous noise disruption.
- Impact on surrounding landscape. Overlooked by the Surrey Hills AONB and with much of Warnham itself a conservation area the visual impact of this on this beautiful piece of countryside is not to be underestimated. It will have an impact on Horsham's visitor economy and on the enjoyment of visitors to the AONB area.
- Impact on Highway capacity. The A24 at the end of our driveway is already hugely busy, particularly at peak times. The increased traffic this scheme will incur will make it a nightmare.
- Impact of cumulative development. Horsham is undergoing lengthy developments on top of its existing including a large scheme for North Horsham. This scheme on top of the rest will result in cumulative adverse impacts.

And finally, what is the need for it? It has not been sufficiently demonstrated that the facility is needed to maintain a net self-sufficiency to manage the transfer, recycling and treatment of waste generated within West Sussex.

We hope the views of those of us who will have to live in the shadow of this proposed incinerator are given weight in this appeal process.

Kind Regards,

Gail Mackintosh

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR MICHAEL MARRS	
Address	Newlands Road	

### Horsham West Sussex RH12 2BY

ABOUT YOUR COMMENTS
In what capacity do you wish to make representations on this case?
☐ Appellant
☐ Agent
☑ Interested Party / Person
☐ Land Owner
□ Rule 6 (6)
What kind of representation are you making?
☐ Final Comments
☐ Proof of Evidence
☐ Statement
☐ Statement of Common Ground
☑ Interested Party/Person Correspondence
□ Other

An incinerator at the intended site would have a devastating effect on the health and wellbeing of Horsham inhabitants. The town lies in a valley sourrounded by the hills to the north, where the incinerator would be sited, and to the south at Denne park. Poluted air tends to run down into the town as happens now from the landfill site, and the addition of an incinerator would be hugely detrimental to Horsham.

From: Sent: To: Subject	04 March 2019 19:14 helen.skinner@pins.gsi.gov.uk APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD		
	To the Planning Inspector,		
	Re: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.		
	As a local Horsham resident, I am extremely concerned that this application is being appealed.		
	The height, size and mass of the proposed building will have an undeniable, detrimental effect on the local landscape. The design is unsightly and entirely out of keeping with the general planning of the Horsham area.  The construction on the site 'as is' can already be seen when driving along the A24 or flying in to land at Gatwick airport. It spoils the landscape now; further development would be catastrophic.		
	Please do everything you can to stop this on behalf of the residents of Horsham.		
	Kind regards,		
	James Marsh		
	53 Blunts Way, Horsham		

For more information please visit <a href="http://www.symanteccloud.com">http://www.symanteccloud.com</a>

From:

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Fw: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road,

Horsham RH12 4QD

Dear Ms Skinner,

Apologies, I should have included my address which is 53 Blunts Way, Horsham

Regards,

Lydia Marsh

----Original Message----

From:

Date: 04/03/2019 18:57

To: <helen.skinner@pins.gsi.gov.uk>

Subj: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road,

Horsham RH12 4QD

### To the Planning Inspector,

Re: APP/P3800/W/18/3218965 Former Wealden Brickworks, Langhurstwood Road, Horsham RH12 4QD.

As a local Horsham resident, I am extremely concerned that this application is being appealed.

The height, size and mass of the proposed building will have an undeniable, detrimental effect on the local landscape. The design is unsightly and entirely out of keeping with area. The proposed buildings are significantly higher than anything in the surrounding area and would not aligned to the strategy for the planning design of Horsham.

The building height is still planned to be 12 storeys and is an oversized building for the small site. This development will be out of keeping with anything else in Horsham. That together with a 95m chimney will be seen as a huge blot on the landscape for years to come.

Consultees have pointed out that the applicant has made mathematical errors, mainly for carbon dioxide and NOX.

This development has implications on health which cannot be left unanswered. Accurate data is paramount. Once that is available, surely this application must be stopped if it poses a threat to worsen the quality of our air, water or soil through further toxic emissions or pollutants.

Please do everything you can to stop this on behalf of the residents of Horsham.

Kind regards,

Lydia Marsh

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**From:** Georgy Mason

**Sent:** 04 March 2019 23:12

To:Helen.skinner@pins.gsi.gov.ukSubject:APP/P3800/W/18/3218965

### Dear Helen

I'm writing to you about the proposed plan for an incinerator in north Horsham.

I am deeply opposed to this project in the following grounds:

- 1. Traffic burden on the roads is going up all the time due to housing developments which I understand is necessary but this incinerator is not!
- 2. Our recycling rates in West Sussex are ever increasing making an incinerator redundant in a few year 3. Increased health issues for the elderly and asthmatic.
- 4. The strong links between plume pollution and the impact this has on girls fertility those ar many primary schools will be impacted as well as those at Tanbrige and Millais.
- 5. The impact both the above will have on local NHS trusts budgets trying to repair this damage
- 6 the impact on wildlife and our eco systems 7. The aesthetics of such a monstrosity on our skyline

I'm quite certain there are many more!

Best Georgy Mason Sent from my iPhone

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1

From: Rosie May

**Sent:** 04 March 2019 18:13

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** OBJECTION TO INCINERATOR IN HORSHAM

dear helen

i am writing to strongly object to planning application

APP/P3800/W/18/3218965

the climate change impacts of incineration are so much worse than landfill

the impact in the local area is massive

the excess use of the surrounding roads is massive

will have a big effect on public health

PLEASE THINK AGAIN

Yours sincerely

rosie may

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From: Rob McCartney

**Sent:** 17 January 2019 19:05

**To:** Skinner, Helen

**Subject:** Incinerator planning....

Dear Helen -

I wish to reiterate my continued support FOR this incinerator.

I have known and used this site for many years; the incinerator is vital.

I am a landscaper and registered waste carrier - we need this facility, and soon.

Best regards

Robert McCartney H / 250108

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE			
Appeal Reference	APP/P3800/W/18/3218965		
Appeal By	BRITANIACREST RECYCLING LTD		
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349		
SENDER DETAILS			
Name	MR MARK MCCORD		
Address	15 Warnham Court Mews Warnham RH12 3QE		
ABOUT YOUR COMMENTS			
In what capacity do you wish to make representations on this case?			
□ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)			
What kind of representation are you making?			
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>			

At a time when most countries -- and some of the UK's local authorities -- are recycling up to 90 per cent of their waste, there's no excuse as I can see, other than greed and council inertia, to build waste incinerators. Money should be spent on recycling waste, not incinerating it. Burning refuse just sweeps the pollution problem under the carpet by converting one environmental hazard into another. It's also cowardly of the local council to ignore the overwhelming consensus of local people (and I'm guessing, the development arm of Legal and General, which just bought the adjacent North Horsham Development lands) and weaken its objection.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MRS TANA MCEVOY	
Address	Springfield Blunts Way HORSHAM RH12 2BL	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?  □ Appellant □ Agent ☑ Interested Party / Person □ Land Owner □ Rule 6 (6)		
What kind of representation  ☐ Final Comments  ☐ Proof of Evidence  ☐ Statement  ☐ Statement of Commo  ☑ Interested Party/Pers  ☐ Other	n Ground	

There are no good reasons for an incinerator to dispose of waste and I endorse West Sussex County Council's original reasons for refusal: the development would have an unacceptable impact on landscape and the visual amenity of the area, on highway capacity, residential amenity and public health. The development, along with other existing, allocated and permitted development, including the North of Horsham development, would result in adverse cumulative impacts. Since we have experienced weather last summer and this February that have set alarm bells ringing across the country, it is unconscionable that such a scheme would be put forward for appeal. As someone involved in environmental education for many years, I cannot think of a more unsustainable project or one that clearly is putting big business ahead of the environment. Horsham is an expanding town with many exciting new projects and housing schemes - the incinerator would be become a hideous landmark and detract from this being a beautiful place to live and work in. We already have Gatwick Airport 'expanding by stealth', this incinerator scheme would be yet another blight. This is not a case of NIMBYism - there are other, sustainable, ways of dealing with industrial and domestic waste.

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR JOHN MCGUFFOG	
Address	5 River Walk HORSHAM RH12 1DU	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
□ Appellant		
☐ Agent ☑ Interested Party / Person		
☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence ☐ Statement		
□ Statement of Common Ground		
<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>		

Surveyor & Arbitrator

This Planning Application for a Waste Incinerator that includes a 95m [311 feet!] exhaust chimney immediately west of a new development to comprise some 2750 new homes, schooling and other community facilities is totally unacceptable on grounds of pollution, air contamination (some of the fumes are very likely to be heavier than air) High HGV vehicle movements on a minor & narrow public road together with potential safety hazards for airplanes too & from Gatwick Airport. An alternative site is on the former cement works north of Shoreham that has remained abandoned for many years. This proposed facility in Horsham is grossly insensitive and totally unacceptable; it has

already been refused twice by Horsham District Council. John L McGuffog FRICS MCIArb Chartered

Page 2 of 2

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### The Planning Inspectorate

### COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	PROF IAN MCLAREN	
Address	29 Kingfisher Way HORSHAM RH12 2LT	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?		
☐ Appellant ☐ Agent		
✓ Interested Party / Person		
☐ Land Owner		
Rule 6 (6) What kind of representation are you making?		
☐ Final Comments		
☐ Proof of Evidence ☐ Statement		
☐ Statement ☐ Statement of Common Ground		
<ul><li>✓ Interested Party/Person Correspondence</li><li>□ Other</li></ul>		
U Other		

The development would also have an unacceptable impact on 7 counts. 1) It, together with existing and permitted development, particularly the North Horsham Development, would adversely affect cumulative impacts. 2) It has yet to be demonstrated that the facility is required to maintain net self-sufficiency for the management, transference, recycling, and treatment of waste generated within West Sussex. 3) The development would also have an unacceptable impact on highway capacity within the district, and 4) affect negatively the residential amenity. The development would have an unacceptable impact on 5) the landscape, 6) visual amenity, and 7) public health.

From:

**Sent:** 03 March 2019 16:14

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Appeal Reference APP/P3800/W/18/3218965

**Attachments:** Previous objection letter for WSCC\_015\_18\_NH.docx

Hi Helen,

Please can it be lodged that my objection to the planning permission associated with an incinerator just off Langhurst Wood Road in Horsham stands as previously submitted. APP/P3800/W/18/3218965

I also would like to add that the applicant has failed to demonstrate the means by which it will make use of the electricity generated and notes there is insufficient heat customer base in Horsham or North Horsham in which this is proposed to be sited. I note DEFRAs new Waste and Resource strategy for England clearly states all UK incinerators need to be able to achieve R1 status and this is a clear focus for the English Government. I am doubtful based on the above information that the applicant supplied that this can met due to the location of the proposed plant, and therefore should not be encouraged by providing planning permission. If the Planning Inspectorate is of a mind to approve, then I would like an R1 constraint to be applied to the planning in line with the Ford EfW plant given permission by WSCC. There is precedence, and this application should not be treated any differently. If there is the means to restrict how far the waste is moved, again this is something I personally would favour. Importing waste over long distances by HGV polluting vehicles is not sustainable and clearly will add to the challenge the UK has got in meeting key Climate Change reduction targets it proposed and signed up to.

I also would really like to highlight and ask for closer consideration of the traffic assessments made for this (and its reliance on that undertaken for the strategic housing solution for North Horsham). Of most concern to me is the increase in HGV vehicles, which although permitted for, the current business is not utilising along with the proposed new road layouts following the introduction of a new housing and business park in North Horsham. The current road is already unusable by non-vehicular users as there are no paths, no lighting, and the speed limit is 40mph. Over 600 HGVs have been permitted for waste business a day which is excessive for such a rural road with residents. As I walk to the station at Warnham from home, I feel intimidated and vulnerable as I walk down Langhurst Wood Road. Both cars and HGVs provide insufficient space to me, and rarely slow down. I have had a number of near misses where vehicles have put me in danger by not slowing down/ stopping or leaving sufficient space to pass. The worst scenario was of a waste vehicle which refused to stop while I continued to walk down the road when half of the road was sectioned off for road maintenance work- this resulted in me being face to face with the truck and no ability to get around the truck physically without having to walk in the overgrown hedgerow in my business attire getting stung by stinging nettles. Cyclist often fair in a similar way. My personal view is that the Langhurst Wood Road access needs to be reconsidered if this development were to be permitted, as there is no equality for non-vehicular users. With the residential population significantly increasing, this has to be rectified. Warnham station is likely to be the only commuting station if the planned new station is either not built, or built in Faygate. There are also likely to be users who work in places on the Warnham line. A purpose build road, if they will not consider railway use, needs to be funded by the applicant to take full responsibility for their business operations, so as not to unfairly impact on other neighbours. Significant HGV traffic now transporting hazardous/toxic waste along with waste past a new primary school and residential properties is not the correct answer and there are other options which need to be explored to mitigate the impact.

All my other previous points stand. I also fully stand by and endorse fully the objection written by No incinerator 4 Horsham (Ni4H)

Thanks

Kirsty McShane

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## **Jane Moseley**

From: Sent: To: Subject:	26 February 2019 23:36 helen.skinner@pins.gsi.gov.uk Horsham Incinerator Planning Appeal Reference APP/P3800/W/18/3218965
To the Planning Inspector:	
	original application by Britaniacrest for an incinerator in Horsham. I am now again writing to restate peal from Britaniacrest for the same incinerator.
	st representations made by members of the public so that I do not have to repeat mine here. However I sons that the WSCC refused the planning applications in 2018 which were as follows:
	facility is needed to maintain net self-sufficiency to manage the transfer, recycling and treatment of erefore, the development is contrary to strategic objective 3 of the West Sussex Waste Local Plan 2014.
2. The development would have an unact the West Sussex Waste Local Plan 2014.	ceptable impact on landscape and the visual amenity of the area, contrary to policies W12 and W13 of
3. The development would have an unacc Local Plan 2014.	ceptable impact on highway capacity, contrary to Policies W10 and W18 of the West Sussex Waste
4. The development would have an unacconditional Plan 2014.	ceptable impact on residential amenity, contrary to Policies W10 and W19 of the West Sussex Waste
5. The development would have an unacc	ceptable impact on public health, contrary to Policy W19 of the West Sussex Waste Local Plan 2014.
	isting, allocated and permitted development, including the North of Horsham development, would resul to W10 and W21 of the West Sussex Waste Local Plan 2014.
The size of the construction is excessive	ly large and high and will have a major impact on Horsham and surrounding villages as well as AONB.
outstanding Natural Beauty. There are al	the tenhance the local area but blight this area and be visible from kilometres away in areas of Area of lso unanswered questions about the pollution resulting from emissions, (including lead, mercury, impact it will have on business travel due to congestion and detrimental impact on Horsham as a whole
the incinerator will be impacted. This wi	ng and for reducing the use of plastics especially for packaging the availability of suitable waste to feed all mean waste having to be imported from further afield than West Sussex. This will mean greater ments as well as the emissions from the incinerator. <b>Over the life of the incinerator I suspect that thi</b>
	ay motion 581 in November 2017 stated "That this House notes in the UK there is now more waste astruction than it is forecast there will be genuinely residual combustible waste to burn; further notes that it to achieving the recycling society".
	use, composting etc. rather than burning. The public mood is not for supporting incineration but for the think that even if the incinerator is built its life may be shortened by the changing politics in this
For these reasons and the others out	tlined above I object to the Britaniacrest incinerator appeal.
Regards,	
Paul Meredith	
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# The Planning Inspectorate

## COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR STEPHEN MORRIS	
Address	2 Spinney Close HORSHAM RH12 4PL	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?  ☐ Appellant ☐ Agent ☑ Interested Party / Person ☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

### COMMENT DOCUMENTS

The documents listed below were uploaded with this form:

Relates to Section: REPRESENTATION

Document Description: Your comments on the appeal.

File name: SWM Letter to Inspector Re planning Appeal by Britaniacrest 24 February

2019.pdf

PLEASE ENSURE THAT A COPY OF THIS SHEET IS ENCLOSED WHEN POSTING THE ABOVE DOCUMENTS TO US

Mr S W Morris 2 Spinney Close Horsham, West Sussex RH12 4PL 24 February 2019

Dear Mr Jenkins

Re- Reference: APP/P3800/W/18/3218965: TOWN AND COUNTRY PLANNING ACT 1990
APPEAL BY Britaniacrest Recycling Ltd.
SITE AT Former Wealden Brickworks, Langhurst Wood Road, Horsham

I have previously written to West Sussex County Council to object to the original Planning application for the above and having noted with satisfaction its rejection, we are now faced with an appeal by Britaniacrest for this very large and totally out of place development and therefore I am reiterating my objection, which now includes comments on the approach being adopted by WSCC.

There is a clear contradiction between the aspirations of Horsham District Council and West Sussex County council as to the use of the land to the North West of Horsham.

HDC have granted Outline Planning consent to Liberty Property Trust for the North Horsham Development comprising a mixed community of primarily 2700 homes plus supporting educational, retail and commercial use, whereas WSCC are in effect now supporting an enlargement of the former Brickworks waste processing plant capacity by which Britaniacrest Recycling Ltd are seeking consent to construct their 'Energy from Waste' Incinerator development, wherein they previously rejected it.

WSCC have sought to promote the expansion of the waste processing plant at this location initially by sanctioning an increase in the haulage of waste to the site by a further 15% (30,000 tonnes) of refuse per annum, being far in excess of what was the likely throughput for the existing MRRF / Anaerobic plant. Obviously Britaniacrest also had a working understanding with WSCC, prior to committing costs for the engagement of RPS to prepare a detailed scheme for the incineration plant and seeking planning consent. I have worked with RPS on Rail related projects and appreciate their engineering skills but in this instance, note that the proposed plant albeit now of lesser height than originally conceived, achieves economy of process by sheer scale, and is potentially much greater than the local requirements of WSCC and is thus able to serve additional Local Authorities waste generation from beyond WSCC boundaries.

At the time of the first application by Britaniacrest WSCC chose to seek comments from only very limited local consultation and certainly not the residents south of the A264 as far as I am aware. However once this application became common knowledge, representation from residents in the likely pollution area wrote in with comments, myself included and this transpired with the considerable support from HDC to a rejection by WSCC, the timing of which was prior to the granting of consent to the North Horsham mixed development. Now that Britaniacrest are appealing I was frankly appalled to receive an Email from WSCC who advise that they are choosing to not defend 5 of the 6 items they previously quoted for rejection, on the grounds of 'legal advice', hence the logic of my opening paragraph above. It is obviously convenient for WSCC to expand the operation at the former Wealden brickworks site, being a brownfield area with an existing waste facility, just tolerable to the local community with its present high traffic levels and often odorous discharges. However the sheer magnitude of what is being proposed in addition to what exists will more than double the operation at this site directly upwind of a planned new community and a large residential town, to the detriment of both. In taking account of the two aspirations it is clear that such a massive 'Energy from Waste' facility and the ancillary additional vehicle flow are not environmentally friendly to the quiet enjoyment of the people of Horsham most aptly demonstrated by the planned height of the chimney, to dissipate the pollution from the stack to presumed tolerable limits. In short it is a 'Scheme too far' and in principle, should be located away from existing and planned residential and commercial properties.

In WSCC's mail they do not consider that their former Reason 4 - Residential Amenity is impacted by this additional plant on the existing site and cite only permitted HGV traffic as the concern. I fundamentally disagree with this frankly disingenuous comment and the recent stance being taken by WSCC in fact a reversal of what they previously stated. Reducing the height of the building does not now make it acceptable as nothing else has changed.

The planned new housing development envisages a realignment of the A264 / Langhurstwood Road junction off a new roundabout, truncating the existing connection so as to also accommodate the existing waste site traffic. Having spent 48 years in the management of many key infrastructure construction projects, this looks illogical to me as the golden rule of separating HGV's from residential areas is clearly being broken and would be exacerbated by what would be a more than doubling of current HGV traffic along such a route, regardless of the permitted capacity of 230,000 tonnes of waste per annum, notwithstanding other HGV use. Currently the amount of traffic along this section of the A264 which I have observed since its construction about 25 years ago, is growing exponentially from the ease of connection to the M23 and west of Crawley wherein both have recently undergone road layout changes to ease the congestion at those connections, will manifest itself at the new roundabouts near either development. In addition, my wife and I have noted the cavalier attitude of many of the Brittaniacrest truck drivers who often just pull out of Langhurstwood Road forcing by intimidation, car traffic to swerve to the outside lane to avoid such large bulk carriers, in mediocre condition. This does not bode well for increased vehicular movements to and from the waste site, especially if to be via a residential area and new mini-roundabout on Langhurstwood Road. This aspect should be revisited even if this additional waste plant is rightly rejected.

However my main points of objection are:

- The air pollution of our environment, in which I set out in significant detail to the fact that Refuse Derived Fuels (RDF) do not accord to any standards and accordingly, there is no adequate control over what is brought to site and burnt. The recent rejection of China in no longer accepting Europe's plastic waste will no doubt result in most of the UK's non-recyclable plastics, being incinerated at such sites. Moreover any monitoring if made conditional under any planning consent would most likely be undertaken by the waste plant operator without any third party over-sight by an independent expert. At best it would be retrospective and record what had already been burnt so that the operator would be tempted to cover up all divergences from permitted / target criteria to the detriment of the people of Horsham.
- The plant will be significantly noisy from its basic process including vehicular movements from unloading and handling using mechanised loading shovels all of which I have witnessed at several similar facilities in my professional capacity. There is also an inherent fire risk in the holding bays and such plants, if ablaze create masses of toxic smoke and fumes that will spread to the local community.
- The sheer scale of such a plant required so as to be economic is likely to also import a significant proportion of its RDF from outside of WSCC boundaries and its location at the northern boundary of the county, is testament to this intent. The waste problem is growing and the industry is moving to incineration as the answer, so any facilities will come under increasing demand and I suspect that heavy recyclables will be replaced by lighter RDF's to maintain the allowed tonnage into this site, which could take the amount incinerated up by several magnitudes including pollution.
- There is no direct benefit to the people of Horsham in having and ADDITIONAL waste plant located adjacent to our town so as to process the waste produced by others and polluting our environment, not theirs!

I have set out below extracts of my previous comments including some facts concerning RDF that are worthy of repetition.

#### **Comments:**

The sheer scale of this development may be more in keeping with the empty tundra of northern Russia rather than an historic market town such as Horsham. I have spent my career in commercial construction and fully understand the very blunt magnitude of a featureless block structure 48 m high. In my professional dealings I have seen objections for clad buildings near residential areas of between 10 and 15 m high and requests from planners to keep the height down as far as reasonably practicable to mitigate the appearance. Here we have a structure 3 to 4 times as high that will have red lights on top and to boot a 96 m high chimney spewing a plume of potential pollution hundreds of metres long over a long radius and thousands of homes downwind. I am amazed that with the north Horsham application from Liberty developments being potentially likely, that an Incinerator is being proposed as one will certainly be at total variance to the other.

The brickworks site is already used for waste disposal including a very significant anaerobic digestion plant that is comparatively discrete but by its function does generate a significant amount of road traffic to the North-west of Horsham. I live on the north east side of town and we often note the sulphurous smell of the waste plants at the brickworks site and how often the wind blows from the north exacerbating the northern bypass noise. The addition of a giant incineration plant less than 2 km from my home with a stack designed to spread / dissipate the residual waste over a very large area from its great height so as to achieve 'low' concentrations, does nothing to alleviate the many concerns that I have in this matter. The potential addition of up to 8-10,000 additional residents within this fall out area puts an even greater population at risk, beyond the current residents of north Horsham. In reviewing the Wind Rose for the Gatwick area I note that whilst the prevailing wind is south westerly it does blow from the west through to north east on at least 25% of the time which is effectively over the current / future residential parts of the town.

The real question is what does this proposed installation offer as a benefit to the people of Horsham, especially when considered as an addition to an already recognised environmentally friendly local means of waste treatment / recycling, energy recovery and disposal.

Certainly burning rubbish is cheap but at what cost and to who?

The underlying intent is a commercial venture to collect and burn waste from anywhere between London and the south coast including West Sussex as the local sweetener. London currently has a large waste problem which even involves the use of barges to remove waste via the Thames to a disposal site and I picture the potential unlimited revenue stream that a large possibly underused Incineration site in North Horsham would offer. Is this what we want for our community burning others waste in our back yard at no benefit to the town?

I also note that there is a recent application (Ref DC/15/0677) to extend the waste transit into this site from 200,000 tonnes to 230, 000 tonnes per annum and associated HGV movements. Again we are all aware of the current controversy of diesel vehicle pollution namely toxic particulates and the long term effects that are now becoming apparent and particular concern of the medical professionals, environmentalists and public authorities. This is in addition to the increasing air pollution along a dual carriageway that is a prime feeder between the A24 and M23 and that already affects all of north Horsham as well as its noise output which will equally impact any new large housing scheme north of Horsham.

The bottom line from a health perspective is that the higher the exposure, the greater risk of inhalation conditions arising, which could culminate in lung cancer for some.

Incineration is inherently polluting by its very nature and within the waste industry is considered possibly only safe where the fuel can be suitably categorised. Commercial waste

will be made up of all sorts of combustible matter and can only be categorised by a very high percentage of sampling. However this is totally impracticable for such a large volume of hundreds of thousands of tonnes per annum. This will be from different sources and varying practices of initial waste / recyclable separation by people within the waste contractors 'Client organisations', who will not be living adjacent to this incinerator and are likely to have little thought as to the consequences of their actions. Currently I note that there is a possible move towards a fuel grade of known composition to mitigate risks within the waste industry.

In this connection the following article, set out in Italics, by Geert Cuperus of 26 May 2016 from the Waste Industries publication 'Resource' is relevant;

As incineration becomes increasingly popular, Geert Cuperus from the European Recovered Fuel Organisation (ERFO) outlines the difference between SRF and RDF and the need for standardisation.

Since the early nineties, producing waste derived fuels for energy recovery has been a popular waste management option. Many waste fractions which cannot be easily reused or recycled, particularly if they are composed of materials that are difficult to properly sort or separate, may have a high caloric value that can be used in a fuel for energy recovery.

However, this option is only viable when a well-functioning market exists. This requires waste companies to produce dedicated fuels that comply with the requirements of clients (i.e. those operating combustion facilities). But to do this, they need a common language. This is made difficult by the fact that that, in daily practice, many calorific wastes are referred to as refusederived fuel (RDF). But as there is no official definition of RDF, the content and quality of this may vary. Very often the compositional quality and the environmental parameters are not well described. This poses a risk for producers and users of these fuels as human health and equipment may suffer from certain, sometime hazardous, components in the fuel. As environmental impacts cannot be overseen, public acceptance and acceptance by competent authorities is generally low.

So while an RDF, whatever that may be, might have a good calorific value and low chlorine content, clients can never be sure of its composition because it is not tested and evaluated in an appropriate and standardized way.

To make handling waste derived fuel easier, a common language has been made possible by European standards of CEN/TC 343 for 'solid recovered fuel' (SRF).

SRF is a fuel produced from non-hazardous waste in compliance with the European Standard EN 15359. Although this standard is not an obligation, the main requirement is that a producer specifies and classifies its SRF by detailing its net calorific value, and chlorine and mercury content of the fuel. Specification includes (as mandatory) several other properties, such as the content of all heavy metals mentioned in the Industrial Emissions Directive. Furthermore, a declaration of conformity has to be issued.

Even though this standard means that there is an agreed upon definition of SRF, it is important to note that EN15359 and its underlying standards do not require any quality level. The required quality of SRF is therefore defined by the client, meaning that SRF quality can varv.

SRF will be an important fuel for the future, but more must be done to ensure that waste derived fuel is of SRF quality to create confidence in the market.

Therefore as the waste collection and incineration will be carried out by the same company Britaniacrest, I am very concerned that any notion of a comparable specification of an SRF rather than a RDF will not be an aspiration of this process. The above article also refers to 'waste fractions' that are the components of the waste and therefore its assessed blend. But at any point in time hereafter this blend could vary considerably and higher toxicity components may arise that could only be detected by local monitoring of the likely deposition area preferably by an accredited independent body, but as this is post event, the higher pollution would have already occurred! Moreover the Brexit situation and retention of EN standards as a future safeguard for Incineration in the UK, are very likely to be considered uneconomic by waste contractors, which will be to the detriment of the general public and the local residents to any incineration facility.

In reading the comments within the Memorandum from HDC's Environmental Officer dated 13 January 2018, he has numerous concerns on the validity of the information provided with this application as to correct locations or compatibility of base line references and assumptions.

The locally produced RDF is discounted in the report, notwithstanding my concern over quality issues of what this local RDF may contain per the above, as I suspect that Brittaniacrest is primarily seeking to maximise its revenue stream from sources outside the site.

Additional noise and compliance to achieve stringent criteria is an aspect that I am fully familiar with on large commercial projects and a 6 dB increase in sound pressure level is best described as a factor of fourfold over the base level. For every 3db increase the sound pressure is approximately double. It is possible to attenuate sound locally at its source, but the very nature of so large a structure makes it economically very challenging. In addition a fully detailed Acoustic model is normally a minimum requirement to start the process of proving compliance and fully share the EHOs concern of this token effort and discounting likely significant effect on the local populace with only a handful of receptor points, which will not enhance the quite enjoyment of their homes when by comparison I have had hundreds of receptor points in some models to contend with. There is a general view in planning applications that people keep their windows closed and sound pollution is therefore limited, but in practice the healthy option is fresh air and people should not have to choose between being significantly affected by sound or having good ventilation.

As a further factor, I suspect that the 95 m high chimney may be in part cable stayed as so high to maintain its economic tubular construction. If so, cables at high level in windy conditions can exhibit significant nuisance noise which varies from a low moan to a high pitch whine which as an example is often noted in and around boat yards.

The EHO also refers in his memorandum to air quality and odour and this is of particular concern to me and our community, especially as we are already well aware of the current plant and its emissions in this respect. I understand the requirements of a permit and enforcement but I have no confidence that the site operator has any particular control of exactly what is being burnt into a polluting plume of micro particulates / vapour or of monitoring its effect around the site in the air, on the ground or in water. The latter applying in particular to the Warnham nature reserve, located just a few hundred metres south of the proposed incinerator site.

Specifically he notes that "total concentrations are not included" in the proposal and he makes some very strong comments concerning the anticipated deposition rates being beyond the normal guidance values particularly for arsenic and mercury. His recommendation concludes with a holding objection pending further clarification. In this respect, he is reinforcing my serious concern that given the potential un-ending lifespan of such a facility and its future plant replacements and upgrades, the mounting level of pollution and toxic deposits into the local environment will be an issue for future generations of Horsham residents, our environment and wildlife.

Apart from what is emitted from any chimney, there is also the question of the processing of the large volume of ash and as of non-definable base material, it may also contain some significant toxins that could further pollute ground water if disposed of in land-fill.

The onward transport of recovered / re-cycled matter beyond that currently processed at the site creates a requirement for additional transport and local diesel fume / particulates pollution, which in reality would be best resolved by recycling closer to its point or origin rather than at Horsham. Thus Strategic Objective 5 - "to make provision for a new transfer, recycling and treatment facilities as close as possible to where waste arises" within WSCC's own Waste local Plan of 2014 is being flouted by in effect encouraging waste from far afield such as the hinterland from the coast to London or beyond and as such significantly imports risk to the populace of Horsham from other communities rubbish which should be processed

close to them. Logically a waste plant should be locally supportable if it actually benefits a community who can have a direct input into the amount of waste being generated and requiring processing, but to in effect buy in rubbish from elsewhere to most likely burn locally at the significant profit of one party and pollution of the community is totally inequitable.

From this waste plan Strategic Objective 11 - "To protect and, where possible, enhance the natural and historic environment and resources of the County" is certainly not being followed by such a vast and frankly ugly structure and incineration plant, that can only add a source of further pollution from this site, that all passer's by on the A24 or A264 will see and smell and wonder what promoted such environmental vandalism of the natural and historic environment of north west Horsham. By comparison the 'Angel of the North' makes a very bold and proud regional statement when viewed from the road going north, but driving south into Horsham along the A24 such a gross structure will if constructed, always be to me the Wicked Witch of the South and exude its own plume and smell to boot. This is in no way enhancing the natural environment of Horsham, Warnham, the Warnham Nature Reserve and the supposedly protected areas of outstanding natural beauty in West Sussex and just up the road in Surrey.

Furthermore this development cuts across the clear policy aspects of the aforementioned waste plan as follows;

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.... By any yardstick this application is a direct contravention locally, as it will be a big ugly block with red lights on top to the detriment of Horsham and surrounding rural communities. Obviously other parts of the County may not be affected but I suspect that that is not the intention of this policy as drafted, being in effect to blight one community out of sight of the others.

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 proposal from Britanniacrest does not meet any of the criteria set out above, but it will really enhance the public perception of this waste processing site by adding such a structure and plume that it will certainly not go unnoticed in the future day or night.

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 local lighting to its roadways and aviation lighting. Noise pollution will be significantly higher both day and night on the neighbouring communities, dust and dirt will be greater on all roads local to the plant as will diesel emissions and wider afield, odour and particulates will add further pollution for the Horsham area.

It is apparent from numerous articles in the press that medical science is playing catch up to the long term respiratory problems of airborne pollution and in some quarters such as London, a more pragmatic approach is being taken to reduce long-term exposure. I trust therefore that my points of objection will be fully taken into account together with the concerns of the EHO as to the quality of the technical submission and that this application is rejected not only on public health and nuisance grounds, but also morally as the 50,000 people of Horsham have not been fairly advised of what is planned on the edge of their town.

In summary, the apparent convenience of WSCC in having an additional Waste Incineration plant on this site, will be to the total detriment of Horsham and its residents, who already are playing their part in living alongside an existing waste processing facility, but will not thank you if you allow another, which frankly could be sited well away from a large town elsewhere in the County.

Yours sincerely

Steve Morris MCIOB Chartered Construction Manager For official use only (date received): 04/03/2019 11:00:54

# The Planning Inspectorate

## COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/P3800/W/18/3218965

DETAILS OF THE CASE		
Appeal Reference	APP/P3800/W/18/3218965	
Appeal By	BRITANIACREST RECYCLING LTD	
Site Address	Former Wealden Brickworks Langhurst Wood Road Horsham RH12 4QD Grid Ref Easting: 517058 Grid Ref Northing: 134349	
SENDER DETAILS		
Name	MR ALEX MORRISON	
Address	17 Millais HORSHAM RH13 6BS	
ABOUT YOUR COMMENTS		
In what capacity do you wish to make representations on this case?  ☐ Appellant ☐ Agent ☑ Interested Party / Person ☐ Land Owner ☐ Rule 6 (6)		
What kind of representation are you making?		
<ul> <li>□ Final Comments</li> <li>□ Proof of Evidence</li> <li>□ Statement</li> <li>□ Statement of Common Ground</li> <li>☑ Interested Party/Person Correspondence</li> <li>□ Other</li> </ul>		

### YOUR COMMENTS ON THE CASE

I do not support the development of a very large incinerator in Horsham, which has already an overstretched infrastructure. Importing waste from other areas and processing it in Horsham is a retrograde step and would be damaging to the market town image that has been built up over many years.

I do not think many of the residents, if asked, would support this commercial plan which will further damage the environment.

## **Jane Moseley**

From: Tracy Morrison

**Sent:** 02 March 2019 18:46

**To:** helen.skinner@pins.gsi.gov.uk

**Subject:** Horsham incinerator

APP/P3800/W/18/3218965

I object to the incinerator

Tracy

Sent from my iPhone

This email has been scanned by the Symantec Email Security.cloud service. For more information please visit <a href="http://www.symanteccloud.com">http://www.symanteccloud.com</a>