



The Planning Inspectorate

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RPS Planning & Environment
FAO Daniel Smyth - Senior Director
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Your Ref:
Our Ref: APP/P3800/W/18/3218965

11 July 2019

Dear Sir/Madam,

Town and Country Planning Act 1990
Appeal by Britaniacrest Recycling Ltd
Site Address: Former Wealden Brickworks, Langhurst Wood Road, Horsham, RH12 4QD

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE 2017 EIA REGULATIONS)

We refer to appeal Ref. APP/P3800/W/18/3218965, which commenced on 14 January 2019.

The development proposed consists of a 'recycling, recovery and renewable energy facility and ancillary infrastructure'. By virtue of Regulation 5 of the 2017 EIA Regulations the development proposed is EIA development.

With reference to Regulation 25(11) of the 2017 EIA Regulations, the Inspector asks that you respond to the points set out below, for the purpose of verifying information in the Environmental Statement. With reference to Regulation 25(2), this 'other information' is requested for the purposes of the forthcoming Inquiry.

1) Para 7.11.1 (page 7-32) indicates that 'Dispersion models typically have an accepted uncertainty of up to +/-25% and this is taken into account when devising the criteria for establishing significance.'

- What is the basis of the statement 'Dispersion models typically have an accepted uncertainty of up to +/-25%'?, (provide documentary support)?;
- In this context, what (with reasons) error bars are associated with the dispersion models used in this case?; and,
- How has this uncertainty been 'taken into account when devising the criteria for establishing significance'?

2) Table 7.3 (page 7-5) identifies non-Statutory Air Quality Objectives and Guidelines. For polycyclic aromatic hydrocarbons (PAHs) the guideline set out is an annual average of

0.00025 $\mu\text{g.m}^{-3}$. The same level is given as an Environment Agency Environment Assessment Level (EAL) in Table 7.4. However, Table 7.19 (page 7-26), which deals with predicted maximum process contributions, identifies the EAL as 0.0003 $\mu\text{g.m}^{-3}$ and a predicted environmental concentration (PEC) of 0.00027 $\mu\text{g.m}^{-3}$.

- There appears to be some inconsistency with respect to the relevant EAL. Please clarify which figure should be used and comment on any implications, insofar as there are any, for conclusions regarding the likelihood of exceedance and significance.

3) Para 7.7.7 (page 7-27) indicates that 'Appendix 7.5 shows that, at the nearest sensitive receptors, the PEC is below the EAL and the long-term PAH effect is not considered to be significant.' The highest PAH related PEC shown in Table 7.5.2 appears to be 0.00024 $\mu\text{g.m}^{-3}$ (Station Road 2).

- What (with reasons) error bars are associated with this result?

Please provide your response within 14 days of the date of this correspondence.

Yours faithfully,

Helen Skinner

Helen Skinner

Where applicable, you can use the internet to submit documents, to see information and to check the progress of cases through GOV.UK. The address of the search page is - <https://www.gov.uk/appeal-planning-inspectorate>