



North Horsham Parish Council

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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 6th 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 Growth 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 through 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