MINUTES OF A MEETING OF NORTH HORSHAM PARISH COUNCIL
PLANNING, ENVIRONMENT AND TRANSPORT COMMITTEE
HELD ON THURSDAY 24th JUNE 2021 AT 7.30pm.

Present: Committee Members
Cllr M. Cockerill*, Cllr J. Davidson (Vice Chairman), Cllr Mrs R. Ginn, Cllr Mrs J. Gough,
Cllr R. Knight, Cllr D. Mahon, Cllr R. Millington*, Cllr T. Rickett BEM*, Cllr D. Searle,
Cllr R. Turner (Chairman), Cllr I. Wassell, Cllr Mrs S. Wilton.
*denotes absence.

In attendance: Ross McCartney – Committee Clerk.

PET/929/21 To elect a Chairman
After being nominated by Cllr R. Knight and seconded by Cllr Mrs S. Wilton, Cllr R. Turner was elected Chairman of the Committee.

PET/930/21 To elect a Vice Chairman
After being nominated by Cllr R. Turner and seconded by Cllr R. Knight, Cllr J. Davidson was elected Vice Chairman of the Committee.

PET/931/21 Public Forum
There were no members of public present.

PET/932/21 Apologies for absence
There were apologies and reasons for absence from Cllr M. Cockerill, Cllr R. Millington and Cllr T. Rickett.
The apologies for absence were NOTED.

PET/933/21 Declarations of Interest
There were no declarations of interest.

PET/934/21 Minutes
The Minutes of the Committee Meeting held on 29th April 2021 were agreed and will be signed by the Chairman as a true record at the earliest opportunity.

PET/935/21 Chairman’s Announcements
1. Lists of planning compliance cases received from Horsham District Council (HDC) since 29th April 2021 had been circulated to members of the planning committee.

2. On 27th May 2021, HDC Director of Place responded to a request put forward by HDC, and NHPC, Cllr P. Burgess for details, in readiness for a North of Horsham Development Parish Liaison Meeting, on a posable addition of 500 homes for the north Horsham development. Please see below the Director of Place’s response:
‘The matter of intensification of sites was raised by Members who
asked officers at one of the local plan workshops, many months ago if we were making the best use of land and if more could be achieved, including on allocated sites. We reported back at PDAG (Planning and Development Policy Development Advisory Group) and in further workshops that an additional 500 could be achieved within the red line at north Horsham. There are a number of points that I am sure you will want to note in readiness for your meeting:

- Any delivery of more than 2,750 homes, plus 10% flexibility, would need to be subject to another planning application and s106 agreement. This is unlikely to happen until L&G (Legal and General) reach Phase 3 of the development (some 7-8 years away). They would have to submit a new application which will include a new Environmental Statement (if considered necessary) and address the impact the uplift in numbers will have on infrastructure. This includes a new Transport Statement which will have include any new measures and infrastructure required. There will also be additional contributions and obligations required to address any further impacts, for example – education, air quality, police provision, fire and rescue, community facilities, open space etc.
- The planning permission on land north of Horsham sets parameters for all future development including land use, density, building heights, movement & access, and green infrastructure – all applications have to meet these parameters
- The Design and Landscape strategy has been approved and is high quality. It is the best design code we have for strategic sites. The strategy will be used as the example standard going forward – all applications will be assessed against it.
- The Cycle Strategy is approved and all applications will also be assessed against its requirements
- L&G’s first reserve matters application met all the policy, conditions and legal requirements and within the agreed parameters. It was able to provide more homes than anticipated whilst still providing the very high requirements that we have on this development. There is no cap on the housing numbers for each phase albeit an overall cap as per the outline planning permission.

HDC’s Principle Planning Officer is going to write to all the relevant local members in response to the query regarding the increase in the number of dwellings by 500 units to the Land North of Horsham site to cover the points I have outlined to you.

At the moment L&G are concentrating on Phase 1 and delivering suitable access (including the new bridge) to the new Bohunt school,
which will open at the end of this year.’

3. North Horsham Parish Council’s Traffic Regulation Order for double yellow lines at Roffey Corner has been approved by West Sussex County Council and will progress to the County Local Committee which is expected to take place around November 2021.

4. The public inquiry for DC/20/0470 Land south of Newhouse Farm – Outline application for the erection of 473 dwellings, with new access provided off the Crawley Road, with associated areas of open space and landscaping. All matters reserved apart from access – was attended by Cllr A. Britten, Cllr R. Turner and the Committee Clerk varying the days between each other. Cllr A. Britten represented the Parish Council using the objections submitted to the inspectorate as noted at the previous planning meeting. The public inquiry ended on 4th June 2021 and is being considered by the Planning Inspectorate. Link to the planning inspectorate’s casework portal can be found here: https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3266503&CoID=2164099

5. West Sussex County Council are currently in the process of finalising the development agreement with Muse Developments, the developer partner for WSCC’s planning application at the Novartis Site DC/18/2687 – Outline planning application for the erection of up to 300 dwellings (C3) including the conversion of existing offices buildings 3 and 36) up to 25,000sqm of employment (B1) floorspaces and provision of 618sqm of flexible commercial/community space (A1 A2 A3 D1 Creche) use classes) within the ground floor of converted building 36. Improvements to existing pedestrian and vehicular accesses from Parsonage Road and Wimblehurst Road, new cycle and pedestrian accesses from Parsonage Road, together with associated parking and landscaping. All matters reserved except for access. It is envisioned that the development agreement will be finalised by the end of July 2021. The next Novartis Parish Liaison meeting won’t be organised until this has been completed and is envisioned to be scheduled for September 2021.

6. The Parish Council has received notification of a Community Highway scheme (CHS) that is currently at its feasibility stage. The proposal is to widen the existing footpath (1.2>0.9m width) under the railway bridge on Pondtail Road, incorporating a buildout with a ‘priority to oncoming traffic’ for northbound traffic. See the draft plans attached (Annex 1). WSCC noted the scheme is moving forward quickly and so it has been requested Councillors send any comments onto the Committee Clerk so they can be forwarded, as individual councillor comments, to WSCC.
7. Cllr Mrs J. Gough and Cllr D Mahon attended a roundtable meeting regarding Gatwick Airport’s Northern Runway Project. Cllr J. Gough gave a verbal report (Annex 2). Gatwick Airport’s Summary Report and slides (Annex 3) were expected to be sent to the Parish Council shortly after the Planning Committee meeting.

8. WSCC’s Governance Committee meeting is scheduled to take place on 28th June 2021. There is an item on the agenda proposing County Local Committees to be replaced by a more informal local community engagement forum. The views of the Parish Council have been requested. There is no Parish Council meeting prior to the Governance Committee meeting therefore, Councillors are asked to send any comments onto the Committee Clerk which subsequently will be forwarded to WSCC as individual councillor comments.

The Chairman’s announcements were NOTED.

PET/936/21 Parked cars on the grass verge of Elgar Way junction and Forest Road Roundabout
A local resident has raised concerns regarding cars parking on the grass verge on the junction of Elgar Way, adjacent to Forest Road Roundabout, damaging the verge and reducing visibility for pedestrians and drivers. The resident reports that the vehicles on the verge pull out onto the roundabout, increasing the danger to other road users, and requests bollards to be erected along the verge to prevent this type of parking and improve safety, similar to the bollards currently situated along Forest Road.
The resident has been notified that West Sussex County Council are responsible for highways and it has been suggested they contact their local county councillors.
Councillors that had visited the site announced that parking on the grass verges of the site had ceased and was only present during one stage of building works on a neighbouring property while the vehicles were unable to access the site. It was further noted that grass verges in Redkiln Way have severely deteriorated due to commercial vehicle parking.

It was RESOLVED;
1. To support the prevention of parking on grass verges in the Parish.
2. Where Parish Councillors have identified commercial vehicles parked on grass verges in Redkiln Way, the Parish Council will write to those companies, copying in West Sussex County Council, highlighting concerns regarding damage to the grass verges due to this type of parking.

PET/937/21 Recycling, Recovery and Renewable Energy and Ancillary Infrastructure (Incinerator) at the former Wealden Brickworks.
The Environmental Permit Variation application has been submitted and
was open to consultation originally until midnight on 24th June 2021 but an extension has been granted and it now open until 16th July 2021.

To enable operation of the facility an environmental permit is required for the site. Attached is the Environment Agency’s briefing notes for the application (Annex 4).

A response to the environmental permit application has been drafted (Annex 5). The response has been formed in conjunction with the Planning Committee’s initial response to the Incinerator planning application and coincides with No incinerator 4 Horsham (Ni4H) comments.

It was RESOLVED; the draft response was AGREED for submission to the Environment Agency.

PET/938/21 Planning Appeals

Enforcement Appeals:

<table>
<thead>
<tr>
<th>REASONS FOR APPEAL</th>
<th>Ground (d) – that, at the time the enforcement notice was issued, it was too late to take enforcement action against the matters stated in the notice. Ground (f) – the steps required to comply with the requirements of the notice are excessive and lesser steps would overcome the objections.</th>
</tr>
</thead>
<tbody>
<tr>
<td>APPLICATION REFERENCE</td>
<td>EN/20/0202</td>
</tr>
<tr>
<td>WARD</td>
<td>Roffey North</td>
</tr>
<tr>
<td>ALLEGED BREACH</td>
<td>Without planning permission, change of use of a detached building with nil use to use as a single dwelling.</td>
</tr>
<tr>
<td>SITE</td>
<td>Annexe Rear of 33 Millthorpe Road</td>
</tr>
<tr>
<td>PC COMMENTS</td>
<td></td>
</tr>
<tr>
<td>APPEAL DECISION</td>
<td></td>
</tr>
</tbody>
</table>

The Enforcement Appeal notification has been circulated to members of the committee which details further information.

It was RESOLVED to note the information regarding the appeals.

PET/939/21 Planning Applications

Members noted receipt of the schedule of Planning Applications received under the Town and Country Planning Act 1990 from HDC since 29th April 2021 and considered each application in turn.

It was RESOLVED:

3. That the Committee’s comments on each planning application be forwarded to HDC (appended as part of the minutes).
4. The application with comments made by delegated decision are ratified.
5. To write to HDC to notify them some of the applications on their planning portal were inaccessible and so review and consultation by the Parish Council were unable to take place.
PET/940/21 Planning Decisions
An ongoing schedule of planning decisions made by HDC had been circulated to members of the Committee.
It was RESOLVED to note the schedule of planning decisions circulated with the agenda.

PET/941/21 Date of next Meeting
The next meeting is scheduled for Thursday 22nd July 2021 at 7.30pm.

There being no other business, the Chairman closed the meeting at 8.20pm.

..................................................Chairman

..................................................Date
<table>
<thead>
<tr>
<th>DC/21/0654</th>
<th>Roffey North</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> 173 Farhalls Crescent</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Fell 3 x Oaks</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>Objection to the felling of 3 x oak trees unless it is considered essential for safety reasons by HDC’s Tree Officer.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0714</th>
<th>Roffey North</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> 4 Maple Close</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Remove existing garage replace with single storey side extension</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No comment as HDC have made a decision.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td>Permitted</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0740</th>
<th>Holbrook West</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> 153 Heath Way</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Demolition of existing garage and erection of a single storey side extension.</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No objections.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0776</th>
<th>Horsham Rural</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> Northlands Cottage Graylands Farm Barns Langhurst Wood Road</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Erection of a single storey rear extension.</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No objections.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0806</th>
<th>Roffey South</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> 33 Forest Road</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Surgery to 1 x Oak</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No objections subject to the comments of HDC’s Tree Officer.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td></td>
</tr>
<tr>
<td>DC/21/0832</td>
<td>Holbrook West</td>
</tr>
<tr>
<td>------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Site Address:</td>
<td>34 Erica Way</td>
</tr>
<tr>
<td>Proposal:</td>
<td>Demolition of existing garage and erection of a two storey side extension.</td>
</tr>
<tr>
<td>Parish Council Comment:</td>
<td>No comment as HDC have made a decision.</td>
</tr>
<tr>
<td>HDC Decision</td>
<td>Permitted</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0840</th>
<th>Comptons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Address:</td>
<td>9 Millais Court Manor Fields</td>
</tr>
<tr>
<td>Proposal:</td>
<td>Surgery to 6 x Oaks</td>
</tr>
<tr>
<td>Parish Council Comment:</td>
<td>No objections subject to the comments of HDC’s Tree Officer.</td>
</tr>
<tr>
<td>HDC Decision</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0851</th>
<th>Holbrook East</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Address:</td>
<td>122 Ropeland Way</td>
</tr>
<tr>
<td>Proposal:</td>
<td>Replacement of existing conservatory roof.</td>
</tr>
<tr>
<td>Parish Council Comment:</td>
<td>No objection.</td>
</tr>
<tr>
<td>HDC Decision</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0854</th>
<th>Holbrook West</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Address:</td>
<td>Land at Chaffinch Close</td>
</tr>
<tr>
<td>Proposal:</td>
<td>Surgery to 2 x Oaks</td>
</tr>
<tr>
<td>Parish Council Comment:</td>
<td>No objections subject to the comments of HDC’s Tree Officer.</td>
</tr>
<tr>
<td>HDC Decision</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0855</th>
<th>Holbrook West</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Address:</td>
<td>38 Erica Way</td>
</tr>
<tr>
<td>Proposal:</td>
<td>Erection of a first floor side extension.</td>
</tr>
<tr>
<td>Parish Council Comment:</td>
<td>Objection as the plans and associated documents could not be obtained from HDC’s planning portal.</td>
</tr>
<tr>
<td>HDC Decision</td>
<td></td>
</tr>
<tr>
<td>DC/21/0859</td>
<td>Holbrok West</td>
</tr>
<tr>
<td>------------</td>
<td>--------------</td>
</tr>
</tbody>
</table>
| **Site Address:** 26 Gorse End  
**Proposal:** Erection of a single storey rear/side extension and conversion of garage into habitable living space.  
**Parish Council Comment:** Objection as the plans and associated documents could not be obtained from HDC’s planning portal.  
**HDC Decision** |

<table>
<thead>
<tr>
<th>DC/21/0861</th>
<th>Holbrooke East</th>
</tr>
</thead>
</table>
| **Site Address:** 37 Tylden Way  
**Proposal:** Erection of a single storey side extension.  
**Parish Council Comment:** No objection.  
**HDC Decision** |

<table>
<thead>
<tr>
<th>DC/21/0879</th>
<th>Holbrooke East</th>
</tr>
</thead>
</table>
| **Site Address:** 10 Speedwell Way  
**Proposal:** Surgery to 1 x Oak  
**Parish Council Comment:** No objections subject to the comments of HDC’s Tree Officer.  
**HDC Decision** |

<table>
<thead>
<tr>
<th>DC/21/0894</th>
<th>Roffey North</th>
</tr>
</thead>
</table>
| **Site Address:** 93 Rusper Road  
**Proposal:** Demolition of existing conservatory and erection of single storey rear extension.  
**Parish Council Comment:** Objection as the plans and associated documents could not be obtained from HDC’s planning portal.  
**HDC Decision** |

<table>
<thead>
<tr>
<th>DC/21/0965</th>
<th>Roffey South</th>
</tr>
</thead>
</table>
| **Site Address:** 47 Beech Road  
**Proposal:** Removal of existing conservatory and erection of a single storey rear extension.  
**Parish Council Comment:** No objection.  
**HDC Decision** |
<table>
<thead>
<tr>
<th>Reference</th>
<th>Area</th>
<th>Site Address</th>
<th>Proposal</th>
<th>Parish Council Comment</th>
<th>HDC Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>DC/21/1024</td>
<td>Roffey North</td>
<td>Unit 1 7 Littlehaven Lane</td>
<td>Prior notification for the change of use from offices (B1a) to residential (C3) to form 3No. dwellinghouses.</td>
<td>No comment as HDC have made a decision.</td>
<td>Prior approval requires and permitted.</td>
</tr>
<tr>
<td>DC/21/1099</td>
<td>Horsham Rural</td>
<td>Land North of Horsham Principal Access Works 2 Rusper Road</td>
<td>Creation of a pedestrian and equestrian crossings to Rusper Road, drainage basins and associated infrastructure and landscaping.</td>
<td>No objection provided West Sussex County Council are agreeable with the application.</td>
<td></td>
</tr>
<tr>
<td>DC/21/1111</td>
<td>Holbrook East</td>
<td>Fairleith 2 North Heath Lane</td>
<td>Surgery to 2 x Ash and 2 x Sycamore</td>
<td>No objections subject to the comments of HDC’s Tree Officer.</td>
<td></td>
</tr>
<tr>
<td>DC/21/1137</td>
<td>Holbrook East</td>
<td>12 Chennells Way</td>
<td>Demolition of existing conservatory and erection of a single storey rear extension.</td>
<td>No objection.</td>
<td></td>
</tr>
<tr>
<td>DC/21/1175</td>
<td>Horsham Rural</td>
<td>Land North of Horsham Rusper Road</td>
<td>Non Material Amendment to previously approved application DC/19/1730 (Application for Reserved Matters relating to appearance, landscaping, layout and scale for new school at Land North of Horsham in accordance with application DC/16/1677) Amendments to the foot/cycle bridge on the southern side of the A264.</td>
<td>No comment as HDC have made a decision.</td>
<td>Permitted</td>
</tr>
<tr>
<td>Reference</td>
<td>Location</td>
<td>Site Address</td>
<td>Proposal</td>
<td>Parish Council Comment</td>
<td>HDC Decision</td>
</tr>
<tr>
<td>------------</td>
<td>----------------</td>
<td>-----------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>DC/21/1198</td>
<td>Horsham Rural</td>
<td>North Horsham Old Holbrook</td>
<td>Non-material amendment to DC/20/2047 (Reserved matters application for the erection of 193 residential dwellings with associated parking, landscaping and open space following approval of outline application DC/16/1677, relating to layout, scale, appearance and landscaping). Amendments to house types for Plots 68, 72-73, 89, 93, 95, 111, 115, 126, 146, 147, 150-151; Plots 126-127 &amp; 128 joined to make a terrace row; amendments to parking arrangements and external refuse and bike stores.</td>
<td>No comment as HDC have made a decision.</td>
<td>Permitted</td>
</tr>
<tr>
<td>DC/21/1202</td>
<td>Roffey North</td>
<td>121 Farhalls Crescent</td>
<td>Fell 4 x Oak Trees</td>
<td></td>
<td></td>
</tr>
<tr>
<td>S106/21/0003</td>
<td>Horsham Rural</td>
<td>Land North of Horsham Old Holbrook</td>
<td>Details submitted pursuant to Schedule 3, Part 2, para 1.2 (Reserved Matters Parcel Plan) of the legal agreement for the North Horsham development site (DC/16/1677)</td>
<td>No comment as HDC have made a decision.</td>
<td>Permitted</td>
</tr>
</tbody>
</table>

**The below Planning applications have been commented on by delegated decision and are to be considered for ratification.**

<table>
<thead>
<tr>
<th>Reference</th>
<th>Location</th>
<th>Site Address</th>
<th>Proposal</th>
<th>Parish Council Comment</th>
<th>HDC Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>DC/21/0487</td>
<td>Horsham Rural</td>
<td>The Smithy Graylands Estate Langhurst Wood Road</td>
<td>Erection of a single storey extension to northern elevation.</td>
<td>No objection.</td>
<td>Permitted</td>
</tr>
<tr>
<td>DC/21/0676</td>
<td>Roffey South</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------</td>
<td>--------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Site Address:</strong> Forest House Forest Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Conversion of roof space over existing garages to form an annexe and installation of rooflights and enlarged window.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No objection.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DC/21/0708</th>
<th>Holbrook West</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Address:</strong> 41 Pondtail Park</td>
<td></td>
</tr>
<tr>
<td><strong>Proposal:</strong> Installation of solar panels to rear roof, air source heat pump to side elevation, and new triple glazed windows.</td>
<td></td>
</tr>
<tr>
<td><strong>Parish Council Comment:</strong></td>
<td>No objection.</td>
</tr>
<tr>
<td><strong>HDC Decision</strong></td>
<td>Permitted</td>
</tr>
</tbody>
</table>
Annex 1
Annex 2
Summary of Gatwick Northern Runway Project Roundtable meeting 22nd June 2021

The main reason for the session seemed to be an opportunity for us to be given an update and for us as a PC to encourage the local community to take part in Gatwick Airport's forthcoming consultation about the second runway. We are going to be sent a set of slides of the meeting.

The CAA has approved the plans (concerning air space) but GA has not currently got planning permission to use both runways together. They have to obtain a Development Consent Order from the Planning Inspectorate (PINs) in Bristol and GA has to have a public pre-application consultation before submitting their application. (Currently planned to be held within the next 6 months -probably late September)

Some Interesting Points which arose

- The Northern Runway will be used for smaller departing aircraft only, using existing flight paths for smaller size aircraft of about 250 seats
- The northern runway needs to be moved 12 metres to provide space between the 2 runways
- New building will be required:
  - New taxiways for access to and from the dual runways
  - Small terminal extensions and a new pier
  - 3 new hotels and additional car parking
  - Due to less permeable area (extra concrete) have to ensure that there is no flooding for local residents and no effect on the rivers
  - Considering changes to the road network due to the pressure of increased traffic to the airport e.g Longbridge, North and South terminal roundabouts

- Stages of the process to obtain the Development Consent Order

  Stage 1: Consultation with all stakeholders and feedback published

  Stage 2: Refine the scheme and incorporate some of the feedback from the consultation process into the final form of the DCO application process (2022)

  Stage 3: Submit to PINs who have 28 days to determine if they accept the application

  Stage 4: Pre-exam period. Stake holders submit a written report to the Inspectorate and will be kept informed about the progress of the application

  Stage 5: Examination (2023) Interested parties can send their written questions and views to the PINs and speak at one of the public hearings during the 6 months over which the examination is held
Stage 6: **Recommendation and Decision.** PINs accept or refuse the submission and The Secretary of state reviews the report and makes the final decision

Stage 7: **Post decision.** If approved by the Secretary of State construction of the Project must start within 5 years

- **Public Involvement in the consultation**
  - Virtual consultation on website
  - Whole document (very long) will be deposited in a civic centre or main library
  - Mobile project office set up with a consultation summary and response form
  - Webinars for specific community groups
  - “speak to the expert slot” to ask for topic specific questions e.g. air quality or noise experts

- **Parish Council Involvement**
  - Make local people aware the consultation is about to happen within the next 6 months (possibly September 2021)

Joy Gough 24/06/2021
Annex 3
Gatwick Northern Runway Project – 22 June 2021

Summary of Points and Questions from Roundtable Discussion

Present:
Janet Roskilly  Friends of Goff Park, Crawley
Andrew Eley  Three Bridges Forum, Crawley
Jean Elmer  Tilgate Forum, Crawley
Nigel Hilpaul  Horsham Denne Neighbourhood Council
Donald Mahon  North Horsham Parish Council
Joy Gough  North Horsham Parish Council
Apologies  Horsham Trafalgar Neighbourhood Council

The Northern Runway Project is restarting after being temporarily paused in the spring due to Covid-19. The project will seek Development Consent, via the 2008 Planning Act, for a dual-runway operation using the existing Northern Runway in tandem with our main runway. Despite the fact that passenger numbers are still low and may continue to be so for some time to come, progressing our application to deliver long-term growth and added resilience at Gatwick is the best way to secure the airport’s long-term future and the earliest return to it being the economic heart of our regional economy, with all the benefits for local employment and livelihoods that this will bring.

Work has now commenced to prepare for a public consultation in the summer of this year, in which all residents and stakeholders will be able to give their views on the schemes proposals. Following the conclusion of this consultation, and after carefully considering all the feedback received, we would expect to submit an application to the Planning Inspectorate for Development Consent sometime in 2022. As part of the project restart we will be re-engaging with the Local Authorities and other stakeholders including Parish and Town Councils, to ensure that they are kept informed of the project’s progress and are able to engage effectively with the consultation materials which will be produced.

The slides that were presented at the meeting are being circulated together with a summary herein of the questions raised at the meeting. A short film explaining the process for a Development Consent Order can be found here.

• What is the likely schedule for operating the Northern Runway, including during the night period?

The schedule would be similar to the current pattern. The Department for Transport has for many years had in place air traffic movement limits to restrict noise impacts during the night period (2330-0600). Gatwick’s summer limit is 11,200 but, in the Winter, this is reduced to 3,250 flights.

It is worth mentioning that there is an ongoing night flights restriction consultation. The night flight restrictions consultation was published on 2 December 2020. It has two main purposes. Firstly, to consult on the proposal to maintain existing night flight restrictions at the designated airports (Heathrow, Gatwick and Stansted) from 2022 to 2024 and the proposal to ban QC4 rated aircraft movements between 11:30pm and 6am. The second purpose is to
acquire early views and evidence about future night flight policy both at the designated airports and nationally beyond 2024. The consultation on the short-term proposals has now closed but the deadline for responses on the longer-term policy reform has been extended.

- **Given that Gatwick has deferred its capital expenditure is it your intention to pursue the DCO promptly ie in earnest now?**

Yes. Earlier in the year we recommenced the planning process and began to prepare the application for development consent by gathering and updating economic, social and environmental information, carrying out further surveys and scoping and we are already actively engaging with public bodies and statutory consultees. It is a relatively lengthy process and we hope the application itself will be submitted to the Planning Inspectorate sometime in 2022. It will then be an 18-month process (as outlined in the presentation) with a decision not expected until 2024. The early phases of the project will take somewhere in the region of 5 years to build and therefore a dual runway would not be operational before 2029. Given the timescales involved, this is why we have commenced the planning application now.

- **This is clearly a long-term project, but local communities will be interested in what is happening in the near future. What’s happening in the next 6 months?**

Formal public consultation is likely to take place in late Summer 2021 (possibly September) and we will, of course, be widely publicising the dates in advance, as well as setting out how we will carry out the consultation. The purpose of these meetings is to raise awareness of the scope of the Northern Runway project and to explain how communities can engage in the public consultation. We are keen to encourage participation in the consultation process.

- **Will details about the consultation be easy to find?**

Yes. It is an open and transparent process and all documentation that is submitted to the Planning Inspectorate (PINS) can be seen in full on the PINS website. We will also ensure that the pages of the Gatwick Airport website regarding the Project are easy to find, comprehensive and clear in regard to the application and the consultation.
Gatwick Airport
Northern Runway DCO Update

Parish/Town Council & Neighbourhood Groups Roundtable Online Events

June 2021
Agenda

1. Welcome, Introductions & Purpose of today’s session
2. Gatwick Business Update
3. Northern Runway Scheme Overview
4. Questions
5. The Development Consent Order Process
6. Questions
Purpose of this roundtable event

• **To share information** – we want to ensure Parishes/Neighbourhood groups are fully informed of the DCO process and how to engage in this process most effectively

• **To build mutual understanding** and for attendees to feel able to share this information with their constituents ahead of the formal consultation

• **We want to hear from you** - we have kept these sessions small to hopefully ensure everyone has an opportunity to have their voice heard

**What we will not be able to cover:** Detail of the scheme impacts; benefits and proposed mitigation – this work is still under way and will all be covered during the consultation
Gatwick – pre-Covid-19

A vital piece of national infrastructure, enhancing the UK’s global connectivity and making a significant economic contribution by supporting jobs, tourism and trade throughout the UK.
In 2020, Gatwick saw 10.1 million passengers compared to 46.6 million passengers in 2019, a 78.2% drop.
Impact on revenue and jobs

- Airport revenues have dropped substantially – the airport posted a £465.5m loss for the 12 months of 2020.

- By the end of October 2020, 40% of those employed by Gatwick Airport Limited had lost their jobs (785 in the Spring and a further 598 in October, leaving 1,867).
Capital Investment Plan impacts

- £2.03 billion invested since 2009
- For 2020 and 2021, £250 million of investment was planned each year
Northern Runway Scheme Overview
Making best use of Gatwick

- Gatwick’s Master Plan included the innovative plan to bring the existing **Northern Runway** into routine use to help unlock **new capacity** from the airport’s existing infrastructure.

- Following **12 weeks of public consultation**, which saw over 5,000 responses, **66% of respondents supported** Gatwick’s plans to make best use of its existing runways.

- In 2019 Gatwick set out its intention to take its Northern Runway plans forward through an application under the Planning Act 2008 – using the **Development Consent Order** process.

- The project was paused in 2020 but has now been restarted
What is our Northern Runway?

- The existing Northern Runway is mostly used at the moment for aircraft to taxi to their gate, or when the Main Runway is closed for maintenance or emergencies.

- Bringing the Northern Runway into routine use would offer a **low-impact** way of unlocking **new capacity** and **increased resilience** from the airport’s existing infrastructure.
The Dual Runway Concept

Only one runway is in use at any one time – improved capacity comes from using the necessary dead period between a take-off and a landing on the main runway to allow a take-off on the northern runway.

Minimal airspace changes are required to facilitate this and these have already been approved by the CAA.

Northern Runway
For smaller departing aircraft only, using existing flightpaths

Main Runway
For all arrivals and larger departing aircraft
How would passengers using Gatwick grow over time?

DUAL runway
- 75 million passengers per year by 2038
- 382k flights per year

SINGLE runway
- 62 million passengers per year by 2038
- 318k flights per year

Gatwick 2019: 47 million passengers and 285k flights per year
Questions
The Development Consent Order process
What is a Development Consent Order?

• Introduced by the Planning Act 2008 to simplify the planning processes for big schemes

• Created a new form of consent: a “development consent order”

• Mandatory for certain types of energy and infrastructure projects above specified thresholds (10mppa increase for airports)

• Intended to make the planning process more predictable in terms of timescale to get a decision, and the outcome more aligned with Government policy
Differences from local planning regime

- Applications are made direct to the Planning Inspectorate (PINS) and granted by the Secretary of State for Transport.

- Emphasis on developer conducting (formal statutory) pre-application consultation before submitting the application.

- DCOs can grant other powers beyond simply permission to develop (e.g. amending roads, changing rights of way).

- The timetable for the examination and determination of the application is fixed (18 months).

- The examination is conducted by PINS through a series of written statements and hearings which the public can attend.
The DCO process: The seven stages

Stage 1: Consultation
- 2021
- We publish our preliminary environmental information on the likely benefits and impacts of our draft proposals and consult local communities and statutory consultees on their views (as required by the 2008 Planning Act).

Stage 2: Refine DCO & submit
- 2022
- All feedback provided to us through the consultation process is reviewed and taken into account when deciding the final form of the DCO application that will be submitted to the Examining Authority (the Planning Inspectorate, also sometimes referred to as PINS).

Stage 3: Acceptance by PINS
- 2023
- If the application is accepted, anyone can register with the Planning Inspectorate as an Interested Party. Doing this ensures that they are kept informed about the progress of the application and are given the opportunity to put forward their views in the examination stage.

Stage 4: Pre-Exam period
- 2023
- Interested parties can send their views in writing to the Planning Inspectorate and also ask to be allowed to speak at one of the public hearings that will be held during the six months over which the Examination is held.

Stage 5: Examination
- 2023
- Once the application has been submitted, the Planning Inspectorate has 28 days to determine whether it meets the required standard to be examined. This includes deciding whether our consultation process in Stage 1 was adequate.

Stage 6: Recommendation & Decision
- 2024
- If the Secretary of State approves the DCO, construction of the project must begin within the specified time period (usually 5 years). The Secretary of State’s decision may be challenged by Judicial Review within 6 weeks of it being made.

Stage 7: Post decision
- 2024
- The Planning Inspectorate makes a recommendation for acceptance or refusal to the Secretary of State for Transport within three months of the end of the examination. The Secretary of State usually takes three months to review their report and make a final decision.

2021  2022  2023  2024
What we are planning to produce for our Consultation

Summary & Questionnaire
  c. 12 pages

Volume 1: Consultation Overview Document
  c. 120 pages

Volume 2: Preliminary Environmental Information Report (PEIR)
  c. 1200 pages

Volume 3:
  a) PEIR Figures, b) PEIR Appendices,
  c) Other technical documents
  c. 1200 pages
What will be in the consultation documents?

1. Noise (Air and Surface Transport)
2. Ground Noise
3. Air Quality
4. Carbon and Climate Change
5. Water Resources
7. Landscape and Visual
8. Cultural Heritage
9. Ground Conditions
10. Economic impacts/benefits
11. Socio-economics
12. Health
13. Land Use and Recreation
14. Major Accidents and Disasters
15. Waste Strategy and CoCP
16. Energy Strategy
17. Construction and Buildability
18. Surface Access Design & Modelling
19. Air Traffic Forecasts
20. Housing & Community
21. Employment Land Demand Analysis

• All these topics have been considered in detail over the last 2 years

• The information developed appears in the Preliminary Environmental Information Report and its Appendices

• These are then summarised into the Consultation Overview Document

• This is then summarised again into the Consultation Summary Document

• All the information will be available on our website at the start of the consultation

• It will also be available on USB stick on request
How can the public get involved?

**During the public consultation:**
- By visiting the virtual consultation event on our website
- By visiting a deposit centre to read paper copies of the documents
- By visiting the mobile project office to pick up a consultation summary document, a response form, a USB stick or to book a “speak to the expert” call
- By attending a webinar held for specific community groups
- By booking a “speak to the expert” slot to ask topic specific questions
- By filling in a consultation response on-line
- By filling in a paper consultation response form
- By sending an e-mail to the consultation address

**After the DCO submission:**
- Become an Interested Party by submitting a Relevant Representation to PINS
- By attending the Preliminary Meeting
- By attending or speaking at a public hearing
Local Authorities
How are we engaging with your Local Authorities?

**Steering Group** – GOG Local Authorities Officers

GAL, Crawley, Reigate & Banstead, Mole Valley, Tandridge, West Sussex, Surrey, Mid Sussex, Horsham, East Sussex, Kent

(and Defra Family where appropriate)

**Technical Officer Group**

(For regular engagement with wider grouping of other prescribed stakeholders) including Parish Councils

**Topic Working Groups**

- Noise Topic Working Group (Air & Ground Noise)
- Air Quality, Carbon and Climate Change Topic Working Group (inc. Accidents and Disasters)
- Housing, Employment and Economics Topic Working Group
- Surface Access Topic Working Group
- Land Use Topic Working Group (Water, Ecology, Landscape, Heritage etc.)

**Consultation Topic Working Group**

GAL & selected GOG officers

**Directors of Public Health** (for HIA)

Local Resilience Forums (for Accidents and Disasters)

**Environment Agency**

- Network Rail
- Natural England

- Highways England

**Historic England**
Next steps

Gatwick

We will share the slides after the meeting including a summary of key themes discussed. We will also follow up any questions that are outstanding.

Parishes

Please share this information within your parish/town council or neighbourhood group.

Please encourage your residents to engage in the consultation events later in the year and respond to the public consultation.
Questions
Annex 4
**Briefing 1: Wealden Works Recycling, Recovery and Renewable Energy Facility, Langhurstwood Road, Horsham, RH12 4QD**

**Variation application number:** EPR/CB3308TD/V002  
**May 2021**

- We have received an environmental permit variation application from Britaniacrest Recycling Limited. The variation is to add mechanical sorting and an energy recovery facility. The applicant states that the facility will be known as the Wealden Works Recycling, Recovery and Renewable (3Rs) Energy Facility and would be located at the existing site off Langhurstwood Road near Horsham. The facility would be capable of treating up to 230,000 tonnes of non-recyclable non-hazardous waste each year from homes and businesses across West Sussex and its neighbouring counties. Asbestos could also be accepted and stored but will not be used in the energy recovery facility. The energy recovery facility would be used to generate electricity which will be exported to the local electrical grid.

- The applicant needs both planning permission and an environmental permit. Planning permission was granted on 27 February 2020 by The Planning Inspectorate.

- We are now inviting you to comment on this permit variation application and we will take all relevant comments into account when determining the permit application. These will be covered in our decision document. We are only able to consider certain aspects of the development applicable to permitting. Planning considerations were considered by West Sussex County Council and via the Planning Inspectorate Appeal.

**Introduction**

We have received an environmental permit variation application for this site. This briefing note will explain what the operator has to do to be issued this permit variation from us, what we can and can't consider when deciding whether to issue the permit variation or not, and how you can make your views known to us.

**What is an environmental permit?**

An environmental permit sets the conditions an operator will be required to meet when operating the facility. It covers the management and operation of the site and the control and monitoring of emissions from the site. The operator will need to demonstrate they are putting in place the necessary measures to meet current standards to protect human health and the environment.

The permit will set out the detail of how the operator intends to protect the health of people and the wider environment. The plans will describe the measures they will take which need to be appropriate to control the risks identified. The operator will need to show that what they propose uses the Best Available Techniques (BAT) for preventing or minimising emissions and impacts on the environment.

**How do we assess an environmental permit application?**

We assess all permit applications to make sure they meet the requirements of the Environmental Permitting Regulations. Emissions limits to protect the environment and human health are set by the EU Withdrawal Act 2018, which incorporates those contained in the Industrial Emissions Directive (IED). In order to achieve these limits, the operator will need to show that they will use Best Available Techniques.

When we consider a permit application we review the design of the proposed facility, how it will be operated, the emissions it will generate (to air, water and land) and whether it will meet the required standards.
We consult professional partners, such as Public Health England and the local council. We also take into consideration the competence of the operator to run the facility.

When an application does, or we anticipate that it might, give rise to significant public interest we consult local communities likely to be affected before making a final decision on whether to issue an environmental permit variation or not.

Providing a business can prove that the proposed activities meets all the legal requirements, including environmental, technological and health requirements, then we are legally obliged to issue a permit variation, even if some people do not approve of the decision.

**Our regulatory role**

If we decide to issue a varied environmental permit to Britaniacrest Recycling Limited, this would allow us to regulate the site in order to prevent harmful pollution and to minimise environmental and human health impacts.

We check:

- categories of waste that would be processed
- site monitoring – techniques, equipment, standards, sampling
- management and facility operating techniques
- energy efficiency, accident prevention, noise and vibration control, odour
- compliance with the legal requirements of the Industrial Emissions Directive and the special conditions related to energy recovery facilities
- compliance with legally binding permit conditions

We do this by:

- issuing permits which say how the facility must be operated, the monitoring that must be done and the limits it must meet
- carrying out regular inspections and audits to ensure compliance with the permit conditions
- requiring operators to monitor selected key emissions continuously and other emissions periodically in accordance with the required monitoring standards and to report the results to us
- regularly reviewing monitoring techniques and assessing monitoring results to measure the performance of the facility and check that it is meeting its limits

If we are aware that an energy recovery facility breaches any of its permit conditions we will take appropriate enforcement action (operators are legally obliged to report all permit breaches to us). This may be a warning for minor breaches along with a compliance score (which can increase the amount of money the facility operator has to pay us each year for our regulatory work) or enforcement notices, suspension and revocation of the environmental permit and even prosecution for more serious offences.

We put all of the monitoring results and records of our inspections and audits on the public register.

**How emissions are monitored**

We set emission limits in the permits and we specify how the emissions will be monitored. We specify the monitoring standards to be used and that the monitoring should comply with strict certification developed by our monitoring specialists. This is known as Monitoring Certification or MCERTS for short. It covers equipment standards, people qualifications and methods used.
For emissions to air, some substances (nitrogen oxides, sulphur dioxide, particulates, carbon monoxide, hydrogen chloride, volatile organic substances and ammonia) are monitored continuously using on site equipment. Operators are not required to monitor all substances continuously. Independent MCERTS qualified specialists attend two to four times per year to verify the monitoring.

They also test for other substances such as heavy metals and dioxins and furans. We know these pollutants are stable provided that the facility is running well. The continuous monitoring allows operators to demonstrate the stability of the facility.

We don’t carry out the monitoring ourselves. But we do review the results, which are regularly submitted by the operator, and audit the arrangements regularly.

We don’t require operators to monitor ambient air for pollutants as it would be impossible to establish what proportion of the pollutants measured is due to the facility and what is due to other pollution sources.

**How is the planning system different?**

Planning permission must be sought from the local planning authority before any development takes place. Planning is a separate and distinct process from permitting. Planning permission can be granted by a local authority without an environmental permit variation being in place and vice versa.

In broad terms, the planning process is intended to ensure that the right sort of development takes place in the right place, and that it is necessary. It addresses the development's proposed land use and how suitable the location is, as well as considering flood risk and other environmental constraints. It also considers operating hours, implications for road traffic, safety and congestion and the potential visual impact in the landscape. These issues are not covered by an environmental permit.

**How can you comment on the environmental permit variation application?**

We now invite you to comment on this permit variation application. The permit variation application can be viewed online on our Consultation Portal, Citizen Space:

https://consult.environment-agency.gov.uk/psc/rh12-4qd-britaniacrest-recycling-limited/

We would encourage you to take part in this consultation online where possible, due to Covid-19 restrictions. If you are unable to access the application online please call our national contact centre on 03708 506 506 between 9am to 6pm Monday to Friday.

This consultation will be open until 24 June 2021. You can send us your comments using our online consultation portal, Citizen Space, or by email to pscpublicresponse@environment-agency.gov.uk

We welcome feedback from everyone who has a view on the application, regardless of their age, sex, disability, marriage and civil partnership status, pregnancy or maternity status, race, religion or belief or their sexual orientation.

We must receive your comments by midnight on 24 June 2021. We will then review all the comments received before making a draft decision on whether we will issue an environmental permit variation.

If we decide that the application has provided sufficient information for us to determine that the facility will not cause harm to the environment or people’s health, we will issue our draft decision for consultation. This will give you the opportunity to examine and make comments on our decision document and on the conditions we are minded to include in the draft permit. We will consider these comments before making our final decision. If we decide to refuse the permit variation, Britaniacrest Recycling Limited have the right to appeal this decision. For general information about our permitting process please see our Citizen Space page https://consult.environment-agency.gov.uk/psc/rh12-4qd-britaniacrest-recycling-limited/ or www.gov.uk/topic/environmental-management/environmental-permits
Briefing 2: Wealden Works Recycling, Recovery and Renewable Energy Facility, Langhurstwood Road, Horsham, RH12 4QD

Variation application number:  EPR/CB3308TD/V002    18 June 2021

Briefing 1 issued in May 2021 gave details of our consultation for the permit variation application for the addition of mechanical sorting and an energy recovery facility to an existing site off Langhurstwood Road, Horsham, operated by Britaniacrest Recycling Limited.

We would encourage you to view the documents on our Consultation Portal, Citizen Space:
https://consult.environment-agency.gov.uk/psc/rh12-4qd-britaniacrest-recycling-limited/

However, if you are unable to view the documentation online, a hard copy of the permit variation application documents is now available to view as follows:

**Horsham Library**
Please contact the library to book an appointment to view the documentation. Details below.

<table>
<thead>
<tr>
<th>Address</th>
<th>Contact details and opening hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Horsham Library</td>
<td>Open Monday to Friday</td>
</tr>
<tr>
<td>Lower Tanbridge Way</td>
<td>9:30am to 5pm</td>
</tr>
<tr>
<td>Horsham</td>
<td>Open Saturday</td>
</tr>
<tr>
<td>RH12 1PJ</td>
<td>9:30am to 4:30pm</td>
</tr>
<tr>
<td></td>
<td>Call 01403 224353 to make an appointment</td>
</tr>
</tbody>
</table>

You can send us your comments using our online consultation portal, Citizen Space (on the above link), or by email to pspcpublicresponse@environment-agency.gov.uk

If you are unable to submit your comments in this way, you can post them to: Environment Agency Permitting and Support Centre, Environmental Permitting Team, Quadrant 2, 99 Parkway Avenue, Parkway Business Park, Sheffield S9 4WF marked 'Variation application number: EPR/CB3308TD/V002'.

**Consultation period**
We have extended the deadline from midnight on 24 June 2021 to midnight 16 July 2021. We will then review all the comments received before making a draft decision on whether we will issue an environmental permit variation.

If we decide that the application has provided sufficient information for us to determine that the facility will not cause harm to the environment or people’s health, we will issue our draft decision for consultation. This will give you the opportunity to examine and make comments on our decision document and on the conditions we are minded to include in the draft permit. We will consider these comments before making our final decision. If we decide to refuse the permit variation, Britaniacrest Recycling Limited have the right to appeal this decision. For general information about our permitting process please see our Citizen Space page https://consult.environment-agency.gov.uk/psc/rh12-4qd-britaniacrest-recycling-limited/ or www.gov.uk/topic/environmental-management/environmental-permits

---

**customer service line**
03708 506 506

**incident hotline**
0800 80 70 60

**floodline**
03459 88 11 88

www.gov.uk/environment-agency
Annex 5
Environment Agency

By e-mail to pscpublicresponse@environment-agency.gov.uk

17th June 2021

Dear Sirs,

Variation application number: - EPR/CB3308TD/V002

Environmental permit variation from Britaniacrest Recycling Ltd. The variation is to add mechanical sorting and an energy recovery facility. The facility will be known as the Wealden Works, Recycling, Recovery and Renewable (3R’s) Energy Facility and is located at the existing site off Langhurstwood Road, North Horsham. The facility would be capable of treating up to 230,000 tonnes of non-recyclable non-hazardous waste each year from homes and businesses across West Sussex and its neighbouring counties. Asbestos could be accepted and stored but will not be used in the energy recovery facility. The energy recovery facility would be used to generate electricity which will be exported to the local electrical grid.

The Parish Council wishes to express concerns regarding the following potential environmental and human health impacts of the proposed activity as follows:-

1. The approved planning application dismissed any health issues associated with the incineration of waste, highlighting that new techniques for cleaning emissions before they are released into the atmosphere have improved and emissions are perfectly safe. The 90m high chimney has been designed so that any harmful fine particulate emissions will be dispersed to air and not reach the ground. However, no consideration appears to have been given to turbulence created by aircraft that may drive the fine particulate emissions from the chimney down to the ground. This could be exacerbated if proposed plans to increase flights from Gatwick Airport go ahead. The Parish Council recommends that a study be commissioned to seek professional advice on the effects of turbulence created by passing aircraft on the emissions.

2. Access to the site is through a residential estate. The Parish Council remains concerned that emissions from vehicular movements to the site are already having an impact on air quality and will affect those living in the vicinity of the proposed facility. The potential for this to be exacerbated in the future is significant. There is also concern regarding the noise, smells and pollution from emissions associated with large vehicles attending the site. There is a potential for waiting lorries
to increase the risk of pollution from idling engines and large vehicles travelling through a residential area pose a safety hazard and loss of amenity for residents. In the past it was hoped that every effort would be made to keep well below the permitted number of vehicle movements to the site. Whilst the current numbers are within the agreed limits they are approaching the maximum.

3. Given the current road layout, it will only be possible to stack one HGV waiting to enter the site via the weighbridge. If there is traffic congestion on route, vehicles will back up and delay other users of the access road. i.e BIFFA and Weinberger. Whilst currently there are no plans to introduce a "just in time" delivery procedure it is likely this will happen in the future. Vehicles arriving before their allotted slot will inevitably wait in local lay-by's and cause minor roads on the North of Horsham Development to be used for parking. Therefore, the Parish Council considers that the weighbridges must be relocated to provide adequate waiting bays for HGV's entering site and prevent blockage of the access road.

4. The Parish Council would request, on behalf of its residents', evidence that Sections 8, 10 and 11 of the NPPF, which refer to healthy communities, the challenge of climate change and conserving and enhancing the natural environment along with HDPF (2015) Policy 33 and WSWLP (2014) W12 are being adhered to.

5. The Parish Council would additionally support the concerns raised in the letter from the No Incinerator 4 Horsham Community Group to the Environmental Agency dated 21st May 2021 a copy of which is appended to this letter.

Yours faithfully

Pauline Whitehead BA (Hons) FILCM
Clerk to North Horsham Parish Council
Dear Sir or Madam,

Thank you for your email sent on 13 May 2021 to No Incinerator 4 Horsham Community Group (Ni4H), notifying us that you have received and are now inviting comments on an environmental permit variation application from Britaniacrest Recycling Limited.

As a Community Group representing local residents, we are writing to you with the following concerns:

1. **Site of High Public Interest (SHPI)** - Your email to Ni4H on 6 November 2020 (copied into the email with this letter) includes: “I can confirm that this application will be treated as a Site of High Public Interest.” and “I have copied Jeremy Quin MP’s researcher into this email so that they are aware that the site will be treated as a SHPI.” However, Britaniacrest Briefing Note 1 does not make it clear if it is being treated as a Site of High Public Interest. This continues to be of interest to Horsham MP, Jeremy Quin, as evidenced by: [https://www.jeremyquin.com/news/environmental-permit-variation-application-horsham-incinerator](https://www.jeremyquin.com/news/environmental-permit-variation-application-horsham-incinerator)

2. **Missing Documents and Information** - Ni4H have spent a substantial amount of time looking at the documents, poor labelling of many makes it challenging to identify, for example, the associated Appendix when it is a separate document. So far, we have found that a number of documents and pieces of vital information are missing, making it more difficult for experts, the council and other consultees and the public to participate in this consultation. Here is the missing information which we have identified so far:

   - Climate Change Risk Assessment – we have seen these included in similar EA permit applications.
   - Application for Environmental Permit Part C2: Copy of the Current Competence Management System Certificate and/or CIWM/WAMITAB Scheme Qualification Certificates, as we understand that operators cannot use ISO 14001 to cover the requirements of the CMS.
   - Air Quality Modelling Files.
   - Human Health Risk Assessment Dispersion Modelling, full list of parameters in a readable format.
   - Wealden Works 3Rs Permit Variation Application:
     - Appendix F - Site Condition and IED Baseline Report: Drawings 1/2/3
     - Appendix F - Site Condition and IED Baseline Report: Appendices F1, F2, F3, F4, F5
     - Appendix G – BAT Assessment BAT Conclusions 2019 on pages 22 to 27 ‘Error! Reference source not found’ appears 7 times
     - Appendix G BAT Assessment: G1 - H1 Tool
     - Appendix I CHP Ready: I3 - Primary Energy Savings Spreadsheet
     - Appendix L: List of Directors

3. **Out of date documents** - Some documents are 5 years old from 2016, others from 2018. Were the latest versions available submitted with this application and if so, should they have been updated before submission? For example:

   a. ‘About this consultation’ document under heading Non-Technical Summary states: ‘Refer to the non-technical summary which explains this application, in non-technical language. This should include a summary of the regulated facility, the key technical standards and control measures arising from the risk assessment.’ As the risk assessments and several other documents are dated 2020, is the non-technical summary dated March 2018 still up to date?
4. **Advertising this Consultation** – What are the plans and timeline for advertising this consultation?

5. **EA Public Consultation Information Is Unclear**
   - About This Consultation - How to Respond, states that your office is now closed, and staff are working remotely. It does not mention the option to telephone responses.
   - Confusingly it states: “We will look to make comments received publicly available at our Environment Agency public facing office.” This implies the office maybe open but it does not state where it is, or how we find out about opening hours or arrangements.
   - Britaniacrest Briefing Note 1 does not mention the email option as an alternative to Citizen Space.

6. **Public Events** - Over 6 months ago, 6 November 2020 email, you said “As we can no longer hold public events at this time we will be looking at alternative arrangements to ensure we can maintain our engagement with you.” What other arrangements are now in place? Ni4H would be happy to suggest local suitable venues, able to comply with the latest Covid guidance, including those able to live stream meetings. Many local people are now proficient using technology to access online meetings.

7. **Viewing printed copies of the documents** - would help facilitate those with poor eyesight or no suitable internet access and those who process information more easily in printed form, especially when needing to cross refer to so many other documents. The documents are so extensive that printing them at home is not viable or good for the environment. Covid restrictions are easing, and we anticipate will do so further on 21st June, just before this consultation ends on 24 June. West Sussex Libraries are now open for limited browsing and pre-bookable computer sessions but the EA public facing office is still not open.

8. **Handwritten Comments** – At planning and inquiry stages for this proposal, many comments were handwritten and sent by post. This EA public consultation only allows submissions online or by phone but only between 9am to 6pm Monday to Friday which may not be possible for those who work full time within those hours. Why can a postal address not be made available? This seems unjustified as letters could be left unopened for several days before being opened by EA staff.

9. **Consultees** – Who are the consultees and how do the public and consultees view comments made by others?

10. **The Community Liaison Group** has not been informed by Britaniacrest Recycling Ltd that the EA public consultation has commenced, and they have not put any information about the EA consultation on their website.

11. **Ensuring Applications Are Complete and Duly Made** - A regulator may conclude that an application is not duly made when, for instance: the information in the application is not sufficiently comprehensive or adequate to make a determination. eg inadequate and outdated Local Area Potential Heat Users Report inter alia. Source: Page 35, 6.4
    

12. **We respectfully ask the EA to pause this consultation** whilst reviewing these concerns, and when all the documents and appropriate consultation arrangements are organised to restart it with an updated Briefing and About this consultation, and extended consultation period as a Site of High Public Interest.

Yours faithfully,

Peter Catchpole, Chairman of No Incinerator 4 Horsham Community Group

Copied to: MP, Jeremy Quin, his Researcher and Clerk, North Horsham Parish Council