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Via Email
County Planning
West Sussex County Council

April 2018

Dear Sir/Madam,

Planning Application to WSCC for Recycling, Recovery and Renewable Energy Facility by Britaniacrest. Ref: WSCC/015/18/NH

Objection

Warnham Parish Council object in the strongest terms to the above application. The design modifications to the application since the original submission do not diminish Warnham Parish Council's unequivocal objection to the proposals. The bases for the objection are:

- 1. Non-compliance with many of the polices of WSCC's Waste Local Plan**
- 2. Scale, location and visibility of the development**
- 3. Aviation lights and site illumination**
- 4. Night time noise intrusion**
- 5. Lack of flue stack details.**

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

Due to the scale and location of the plant it will have an over-powering impact on the parish and the locality, and will be visible from an extensive area of West Sussex and Surrey. As such, it is at variance on a number of counts with the WSCC Waste Local Plan.

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

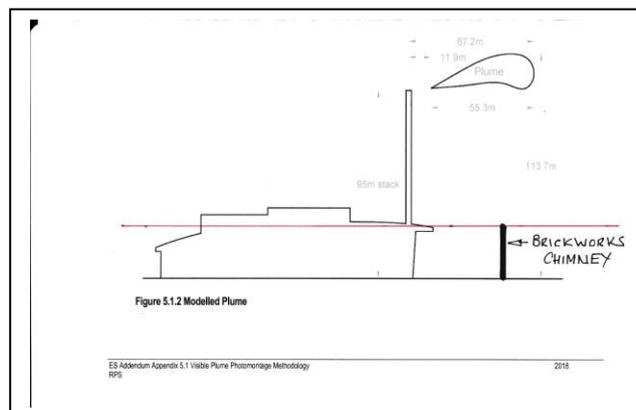
Strategic Objective 10: *To protect and, where possible, enhance the natural and historic environment and resources of the County.* There is no element of the proposals that will enhance the natural environment.

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 adverse effect on the character of the area and hence it is unable to meet this policy.

Policy W12: High Quality Developments. *Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) take into account the need to: (a) integrate with and, where possible, enhance adjoining land-uses..... (b) have regard to the local context including: (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area; (iv) views into and out of the site.* The proposals are clearly unable to meet this policy.

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 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 length of the buildings is 1.4 times the length of a football field. RPS Figure No. 5.8, shown adjacent with the brickworks chimney superimposed, shows the scale of the proposal in comparison to the existing chimney. The existing chimney is readily visible while approaching the locality travelling northwards on the A24. 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.



The submitted illustrations demonstrate the dominance and visual impact 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 will be visible from most locations in the parish and as far away as Box Hill. It is unacceptable that any industrial development in the rural countryside should have a visual exposure over such an extensive rural area and impact residential communities.

The submitted illustrations demonstrate the dominance and visual impact 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 will be visible from most locations in the parish and as far away as Box Hill. It is unacceptable that any industrial development in the rural countryside should have a visual exposure over such an extensive rural area and impact residential communities.

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 the 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 residential properties at Andrews Farm on Station Road is assessed as 'Moderate to Major'. It is not reasonable that this alien development should have an adverse impact of any degree on the residents and views of the parish.

3. Aviation lights and site illumination

The flue stack will need aviation lighting at its full height and, due to its height, at an intermediate level. The building will also need 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 area and the countryside night skies.

4. Noise intrusion

At the operational stage it is acknowledged in the application that at night, with low background noise levels, the noise exposure would be increased at the measurement point of 11 Station Road. The night time noise of operation is described as audible but assessed to be not prominent. Station Road is considered as a single location but Station Road has some 25 properties with an estimated 60+ residents. It is unreasonable that these residents should experience any change to their night-time noise environment as a result of the development.

5. Flue stack

The lack of detail of the chimney stack is of great concern. At an exhibition of the proposals a representative of the applicant admitted that the flue stack had not been fully designed. Reference was made to a comparable plant in Cornwall as an example of how the actual stack may look. On investigation this stack has two adjacent flues. It is most likely that the final design of the stack will require a structure of greater diameter than that shown in the application, or multiple stacks. At 95m high and a narrow width it is an extremely slender design. It may be structurally possible but this needs to be proven and potential wind induced vibrations and harmonic oscillations will be a design issue. It is conventional to fit such stacks with fins or aerofoils to dissipate wind forces and avoid potential damage to the stack. The addition of external features could greatly increase the width of the stack and hence will extend the potential for visual intrusion, and will render the evidence submitted to date as superseded. No planning permission should be considered until the detail design of the stack is finalised and its full impact established.

Conclusion

The development is of a scale 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.

Warnham Parish Council emphatically request that the application is refused in its entirety.

On behalf of Warnham Parish Council

Yours faithfully,

Mrs Ashley Brooks

Parish Clerk