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Mr Sam Dumbrell
County Planning
West Sussex County Council
County Hall,
Chichester
PO19 1RH

29th June 2017

Dear Mr Dumbrell,

Ref: WSCC/062/16/NH: Recycling, Recovery and Renewable Energy Facility by Britaniacrest.

Objection

Warnham Parish Council objected in the strongest terms to the initial application in 2016. The design modifications subsequently submitted to WSCC do not diminish Warnham Parish Council's unequivocal objection to the proposals. The basis of the principal objections are reiterated below.

Non-compliance with WSCC's Waste Local Plan

The scale of the proposed construction is exceptionally large and intimidating. 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 appears to be incompatible with the disposal of local waste and will attract material from an extensive area.

Strategic Objective 11: *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 on the stated criteria.

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 require aviation lighting and have a night-time noise impact and hence the proposals are unable to meet this policy.

Visibility of the development

A prominent feature adjacent to the application site is the chimney to the Wienenberger brickworks. This chimney is 26.5m high. The proposed building, at 48.75m, will be 1.8 times as high as the existing chimney and the proposed flue stack, 95m, is over 3.5 times the height. A development of this scale presents an unacceptable visual and physically overpowering intrusion into the rural countryside.

The submitted plans demonstrate the visual impact of the building and accompanying stack. It is unacceptable that any industrial development in the rural countryside should have a visual exposure over such an extensive area, from the North Downs to the South Downs. The building and stack will be an unwelcome backdrop to views from many locations in the parish.

The majority of Warnham village is a conservation area and the parish has some 94 listed buildings. Visual impacts of this dominance will degrade the value of the conservation status. The intrusion of the stack will be particularly intimidating at times when exhaust plumes are being emitted. This is unacceptable.

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 beggars belief that the impact of this vast development from all locations is assessed as 'Minor Adverse' impact. This needs impartial re-assessment. The assessment appears to be disingenuous: 'Severe adverse' would appear to be more appropriate. It is not reasonable that this alien development should have an adverse impact of any degree on the residents of the parish.

Aviation lights

It was anticipated, being in proximity to Gatwick, that the flue stack would need aviation lighting. However, the additional information shows that the building itself is also of a height which needs aviation lighting. Multiple sources of continuous aviation lighting will be an unwelcome intrusion to the countryside night skies.

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 Station Road. This is considered as a single location. Station Road has some 25 properties with an estimated 75 residents. It is unreasonable that these residents should experience any change to their night-time noise level as a result of the development.

Emissions and air pollution

Of significant local concern is the potential for harmful air pollution, with environmental and health impacts. We anticipate that WSCC will need to be fully satisfied that the proposals meet established local, national and international standards.

Should consent be given it is inevitable in the operational cycles of the proposed plant that unplanned and potentially hazardous events will occur and that emission levels will approach or exceed levels of concern. It will be essential that in these events the plant has automatic shutdown procedures and is not restarted until independent examiners are satisfied that it is safe to do so.

Flue stack

The lack of detail of the chimney stack is of great concern. It is most likely that the final design of the stack will require a structure of greater diameter than that shown. At 95m high and 2.5m wide it is an extremely slender design. It may be structurally possible with a steel stack but wind induced vibrations and harmonic oscillations will be a design issue. It is conventional to fit such stacks with fins or baffles to dissipate wind forces and avoid potential damage to the stack. The addition of fins 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 local demand for waste disposal, its rural location, its countryside environment and its proximity to Warnham Conservation Area.

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

Yours sincerely,



Mrs Ashley Brooks

Clerk to Warnham Parish Council