

Addendum to the formal objection to Planning Application WSCC/062/16/NH –Britaniacrest Recycling Ltd from Ni4H (No incinerator 4 Horsham) 26 June 2017

Introduction

No incinerator for Horsham (Ni4H) is a voluntary group of residents who aim to raise awareness and campaign against the proposal for a large-scale incinerator in Horsham District.

Ni4H takes over from a previous campaign group called HALT in Horsham which successfully fought a proposal for an incinerator in the early 2000s. As a result, West Sussex County Council (WSCC), and the taxpayers of West Sussex, made a significant investment in a Mechanical & Biological Treatment facility (MBT) at the Brookhurst Wood site. The new facility provided West Sussex with an additional waste processing capacity of 310,000 tonnes per annum.

Ni4H appreciates there is a pressing need to manage waste. Members of the group have spent many hours reviewing evidence in the public domain to try to understand waste management needs, technologies and viable solutions. They have also examined the West Sussex Waste Plan and Britaniacrest's supporting documents, attended public meetings, and provided representatives to the Residents Liaison Group (RLG) for Britaniacrest since 2015.

Ni4H submitted an objection to WSCC planning department on 31st January 2017. The objection represented our understanding of the relevant policies, guidance, and planning information available at that point, and within the time given.

Ni4H's objection covered three parts:

- 1) The extent to which the development meets the Waste Local plan and the strategic objectives/policies within in it
- 2) A summary of the members overarching objections
- 3) Comments on the documentation submitted by the applicant including shortfalls, errors, inconsistencies, and inaccuracies

Following the initial consultation period, WSCC requested that Britaniacrest submit additional information by the 17th of March 2018. However, this information was only made available to us on 6th June 2018.

In response, this addendum reaffirms our previous concerns, re-assesses the applicant's response to Regulation 22, as well as presenting new information/concerns which have come to light since our original submission. Sections 1-5 need to be considered in their entirety for completeness sake.

Ni4H would also like to highlight the continuing poor public awareness of this proposal in the wider population of Horsham and its surrounding villages. A second public event, which is customary practice for a development of this scale, has not taken place.

Executive Summary

Ni4H maintains the view that this development does not meet the following objectives, policy, and guidance:

Waste Local plan	<ul style="list-style-type: none"> • Strategic Objective 3 • Strategic Objective 4 • Strategic Objective 5 • Strategic Objective 7 • Strategic Objective 8 	<ul style="list-style-type: none"> • Strategic Objective 9 • Strategic Objective 13 • Policy W21 • Strategic Objective 14
Horsham District Planning Framework (2015)	<ul style="list-style-type: none"> • Strategic Policy 1 • Strategic Policy 2 	<ul style="list-style-type: none"> • Policy 24, 25, 32, 33, 40 and 41
National Planning Policy for Waste (2014)	Paragraph 7	
Planning Practice Guidance	Paragraph 47	

Ni4H's objects to the development on the following grounds:

- **THIS APPLICATION IS NOT FOR A 3RS DEVELOPMENT AS BADGED, AND SHOULD BE REFUSED ON THOSE GROUNDS ALONE. NI4H DO NOT RECOGNISE THIS TO BE A RECOVERY BUSINESS, BUT RATHER A DISPOSAL FACILITY AS DEFINED BY THE EU DIRECTIVE 2008/98/EC.**
- There is little or no evidence of demand for any energy produced from the burning of waste included in the application, and no details of the infrastructure needed to make use it. **The proximity principle MUST BE applied**, and the capacity of such a development significantly reduced.
- The waste source proposed extends significantly beyond West Sussex's waste needs and so is contrary to the West Sussex Waste plan.
- Cumulative effects of waste processing on the local area is at odds with the approved expansion to the residential footprint in very close proximity (North Horsham).
- The site is too small for the proposed development, which would result in a negative impact on the immediate surroundings.
- The building's design and size will create a view of intense industrialisation overshadowing and causing long-term damage to the character of Horsham, Warnham, and the local environment. Harmonisation has not been achieved by the applicant. This building is more appropriate for a large conurbation or historic industrialised area rather than a small rural town in such close proximity to the Surrey Hills, South Downs and other AONBs.
- West Sussex's Waste plan aims to protect, and where possible, enhance the health and amenity of residents, businesses and visitors. This cannot be guaranteed if the proposal goes ahead with resultant and cumulative pollution, land contamination, and poor air quality. The applicant has not provided a Human Health Assessment which could provide WSCC with a view of possible impacts.
- Potential impacts of incinerator traffic, sought in advance under planning applications WSCC/018/14/NH and WSCC/021/15/NH have failed to be provided. Sustainable methods of transport are not being used. Noise and air quality assessments have not included the new levels of traffic, but instead the permitted, traffic expected (but not yet experienced).

- **Loss of amenity for residents, including: noise, odour, traffic, and light pollution**
- **Inadequate consultation with Horsham District residents, including input into the design and sharing of the Environmental Statement.**
- **Increased risk of fire and resultant health risks. There is insufficient information on the impact of high proximity/low but constant exposure to environmental contaminants.**

Section 4: Additional information provided by Britaniacrest and made available to consultees on 6th June 2018

4.1 Landscape and Visual Impact Assessment (Chapter 5)

- 4.1.1 Ni4H notes that the stack remains visible at a 20-km radius, or greater area, and incorporates a definite visual impact on the South Downs, Surrey Hills, and High Weald AONBs. Ni4H finds this is unacceptable.
- 4.1.2 The applicant has failed to cover the following as requested under the Regulation 22 Notice:
- Further evidence to clarify their conclusion that the impact on P1: Upper Arun Valley (para 5.7.6) and K2: Faygate and Warnham Vale (para 5.7.5) would be moderate and minor adverse respectively.
 - Consideration of the plume impact from each visual receptor identified by the visual assessment.
 - Assessment of the impact on the Graylands Copse Moated Site (Scheduled Monument). ☒ They have failed to revise:
 - Figure 5.6 with clearly identifiable, legible viewpoints.
 - Figures 5.7 to 5.17 to show the worst-case scenario (including plume visibility) and provide a methodology for the visualisations included in the figures.
- 4.1.3 It is our opinion that none of the photomontages provided by the applicant has incorporated the plume visibility showing the worst-case scenario. We would also like to draw attention to those occasions, both during daylight and night-time when there is a plume of 0-441 metres. The town of Horsham and its surrounding villages WILL be perceived as an industrialised centre which is out of keeping with the current perception of the town/surrounding area and its history. The applicant has not considered alternative locations.
- 4.1.4 In terms of the visual impact data submitted by applicant and Ni4H, we maintain the view that specific parts of Horsham will be significantly impacted by the sheer size of the re-designed building and the stack. Warnham village will have clear views of the site - mainly in open areas/ gardens as opposed to the view presented by the applicant of the church (which blocks these views and therefore a provides unrepresentative evidence). The area around the A264 between Rusper and the

Great Daux roundabout, the approach to the Great Daux roundabout, the A24 and specifically Kingsfold and Rusper will also be impacted, with unobstructed views of the development. Parts of Langhurst Wood Road, Station Road and Mercer Road will have significant views of the tallest part of the building/ stack. The photomontages produced by Ni4H (MA, BSc (Hons), BArch MA) still stand, with some minor adjustments for the minimal 5 metre reduction in one part of the buildings. We request that you remind yourself of some of these views compared to those produced by the applicant. Due to time constraints, we have been unable to update our photomontages, however, it should be noted that a 5-metre reduction has negligible impact.

4.2 Archaeology and Cultural Heritage Assessment (Chapter 9)

- 4.2.1 The applicant has provided some photomontages during the Springtime when existing trees/hedgerows are at their best in terms of coverage and screening. They note that the moated site, almost adjacent to the Britaniacrest location, is barely visible, which is evidenced in their photographs. This site is currently unmanaged, but it should not be assumed that it will remain so. If there is a decision to make more of the significance of this site - carefully managing the vegetation around the it/improving access as part of the North Horsham development, - then the impact of the incinerator will be much more significant.
- 4.2.2 Ni4H notes that the stack will draw the eye in viewpoints 1, 3, 4 and 5, and to a lesser extent in 2. We vehemently disagree with the developer on this point. Also, the roof line and top of the building remains tall enough to be visible. During the winter months, when leaves and hedgerows become bare, the visual impact will be perceived to be greater and more intrusive to those visiting the area. The North Horsham development is expected to provide a greater level of access to this site going forward. The balance of industrial compared to semi-rural/residential land use will be at odds with an out-of-place, massive stack with visible emissions and a bulky, ugly, industrial-looking building.
- 4.2.3 We remain of the view that the visual impact, where it is at its least, is wholly reliant on the established vegetation remaining as is. However, this is not in the control of the applicant and should be borne in mind. Now that the North Horsham development has been permitted, there will be more pressure for the surrounding area to become ripe for new development proposals which may see the removal of this natural cover.
- 4.2.4 For those viewpoints where no photomontages have been developed, we cannot agree with the unevidenced statements that the stack and building will NOT be visible during the summer months. This should be evidenced. However, although not stated by the applicant, there should be an assumption that in winter the stack and building WILL be visible. Where the stack IS visible (with red lighting which is not shown on any photomontages in addition to plume), we do not agree with the applicant that this

will not be prominent. The applicant makes the argument that the moated site is not visually prominent and therefore the eye is not drawn to the stack. We do not think this makes sense, as the eye will be drawn to the most prominent feature in view which will be the stack in all views evidenced, and the building top in others which will be incongruous with the rural setting.

- 4.2.5 We note there is absolutely no reference to the night-time views from the building lighting and any stack lighting in the applicant's assessment. It should also be noted that the recently developed Graylands residential properties will be impacted significantly by the view of the stack and building top.
- 4.2.6 We note there is insufficient detail on how the stack will be designed. Therefore, the photomontages are also inaccurate on this point. If they are cable-tied, for example, this will add to the intrusion (and noise).
- 4.2.7 We do not believe that there is any evidence to support the applicant's conclusion that the impact on other heritage assets in the vicinity (e.g. Listed Buildings and the Warnham Conservation Area - approximately 1.5 km to the south west) are not significant and would not require mitigation as requested in the Regulation 22 Notice.

4.3 Noise Assessment (Chapter 8)

- 4.3.1 The applicant notes in paragraph 1.10 that ambient noise levels already exceed the criteria in BS 8233:2014 at residential properties during the night-time with windows open. Residents do not accept the argument that it is acceptable to add further to this loss of amenity, i.e. as it's broken already so to break/abuse it more is acceptable. More should be done to ensure there is NO more development which will increase this impact, the applicant should instead consider ways to improve it. At present, there are only a small number of properties directly impacted, but now that North Horsham's Liberty development for 2,750 households has been approved, the impact on residents trying to sleep with windows open for significant periods of the year, is much greater, and should not be permitted. This area is fundamentally semi-rural with residents expecting a high-quality of low ambient noise both in the evenings and weekends. An incinerator is a 24-hour operation.
- 4.3.2 In paragraph 1.4 the applicant notes that the detailed design and the suppliers of the prime movers that generate much of the noise are not known. To permit planning permission without a proper assessment of the noise would be irresponsible and will put the large number of residents in the immediate area, including in North Horsham, at an absolute disadvantage.
- 4.3.3 It is recognised through many health studies that there are various psychological effects of noise pollution, such as the noise predicted by the applicant:
- Depression and fatigue, which considerably reduces the efficiency of a person.
 - Insomnia as a result of lack of undisturbed and refreshing sleep.
 - Straining of the senses and annoyance as a result of slow but persistent noise.

- Difficulty with concentration, disturbance of rest, physical and mental fatigue. Low frequency noise affects the higher centre of brain and causes an alternation in the normal sleep pattern and prevents sound sleep.
- Noise, which is an annoyance also causes irritation, dissatisfaction, disinterest, and affects work performance. Noise has been reported both to improve and to decrease work efficiency, depending on its intensity, duration and frequency distribution etc.

4.3.4 It is Ni4H's view that the applicant has not been able to provide a complete view of the noise impact, because of the lack of detailed planning as noted by themselves. Their argument that aspects are already exceeding good practice is highly flawed.

4.3.5 Additional to the Regulation 22 areas for the developer to respond to, WSCC asked the applicant to provide full details of noise and traffic assessments in relation to the existing site operation - primarily because the difference in permitted traffic and the actual traffic from Britaniacrest Recycling Ltd is vastly different. We do not believe this has been met as no additional information or response has been found for the initial submission.

4.4 Air Quality and Odour Assessment (Chapter 7)

4.4.1 The information provided by the developer on the air quality does not appear to incorporate the impact of the vehicle movements associated with operating the incinerator and focuses only on the stack emissions. The largest amount of pollution from such an operation will be the diesel engine vehicles bringing waste in and out, and delivering the materials to and from site to operate. Ni4H highlighted that although the applicant has requested permission for the vehicle movements for their transfer and recycling operation, they have failed to meet that level of operation at this site. The background levels are therefore not accurate as they do not incorporate the full diesel vehicle-related pollution levels. The applicant should be able to describe the complete level of pollution that its business operations would result in so that it can be compared with not having the operation at all, i.e. no vehicle movement associated with 230,000 tonnes of waste being brought to the site, and additionally to put it into context with the EU limits.

4.4.2 Ni4H would also like to draw attention to paragraph 1.13 where the applicant suggests the "maximum annual-mean NO₂ concentration across the grid exceeds 1% of the relevant EAL". This needs further clarification for those residents impacted from a health perspective. Additionally, Table 3 and para 1.24 notes that for Mercury, the total PEC deposition as % of EAL would be 154.2%. Ni4H does not agree with the argument the developer makes that as the background concentration is 140.3%, an additional 13.9% makes no more of an impact on what is already a failure in meeting the EAL limits for Mercury.

4.4.3 Ni4H would like the planning committee to note, if this application were to be permitted, they would be in effect agreeing that the impact of Mercury to human

health was acceptable despite scientific research stating otherwise, and guideline limits being exceeded already. The trend seen is that as techniques get better in undertaking analysis of pollutants and their impact on the environment, humans and animals, it is showing that what should be deemed acceptable is much lower than the limits established (EAL) today. Additionally, Mercury stores in the body for the lifetime of women and is transferred to any foetuses. Low constant levels of exposure present a specific risk to those most vulnerable in our society. A helpful article can be found at: http://www.env-health.org/IMG/pdf/mercury_chapter1.pdf.

4.4.4 **Ni4H does not think it is acceptable for the WSCC to approve an activity which would add to Mercury pollution which already exceeds acceptable levels and which is likely to have yet unknown harm to the health of the local (rapidly expanding) residential population.** Mercury has been found to be attributable to the following developmental and more general health impacts:

- Nervous system – developmental delays, impaired vision and hearing, motor function, brain function, IQ
- Cardiovascular system – High blood pressure, altered heart rate, increase heart attack risk
- Effects on the immune and reproductive systems, liver and kidneys

4.5 Flood Risk Assessment and Drainage (Chapter 10)

4.5.1 We consider that the applicant has not provided clarification regarding whether the use of 'Pond B' is acceptable and feasible as requested.

4.5.2 We note the maintenance requirements within the drainage documentation, but suggest there is no additional information about the areas identified previously as the habitat of the Great Crested Newts. It is not clear what efforts will be taken to ensure that any pollution or drainage impacts do not undermine this precious habitat to support this protected species.

4.5.3 We would like to highlight that the applicant is planning to discharge its waste water into Baldings Brook. At present, and during adverse weather conditions, the carriageway, at Station Road, floods which puts the residents of Station Road at risk. There is concerns that the change in discharge to Baldings Brook will increase the risk further and note no mitigations have been explored. This needs to be rectified.

4.6 Design and Scale (Chapter 4)

4.6.1 Ni4H remains of the view that the applicant has not provided alternative options for the design and scale of the incinerator through other technologies, such as gasification or pyrolysis. The campaigners have undertaken research and there is a large variation of designs and footprints of incinerators because of the decisions made by the developers of such schemes. The new incinerator being constructed at

South London, for example, is for a capacity of 300,000 tonnes per annum, and is similar in size to this incinerator for 180,000 tonnes per annum. Why?

- 4.6.2 There are also examples of smaller building designs: Dundee will be only 36.75 m at the tallest part of the building with a stack of 90 m for a capacity of 130,000 tonnes per annum. Miller Hill has a similar height building, with a 75-m stack for 195,000 tpa capacity. For the very contentious Newhaven incinerator, the developer was given a maximum height constraint to work within. This has resulted in an innovative design and approach being taken with the building sunk 20 m underground. The resulting building is in the region of 30 m above ground with 2 stacks of 65m (moving-grate technology similar to this proposal with a capacity of 210,000 tpa). In West Sussex, the newly permitted Ford incinerator is a gasification type incinerating 140,000 tpa, which has been developed with a 22-m high building and two 50 m stacks.
- 4.6.3 Ni4H believes that the developer can still improve on the design/scale of the building, which will mitigate the concerns raised specifically to visual impacts only. The applicant has provided no mitigation to the stack size/no discussion of options for the stack which is the main offending/intrusive impact. Additionally, the applicant has not explained what the correlation is between the size/bulk of the building to the incineration capacity. In our view, there is insufficient information for decision makers to know if the developer could/should do more to mitigate the impacts opposed by locals, Horsham District Council and other consultees. We request that it is noted that other providers have developed alternative designs for incinerators which go some way to mitigate the visual impact perceived to fit better into the locale. However, any mitigation of visual impact is only one of many aspects of this objection which needs to be addressed.
- 4.6.4 We believe that the applicant has not met the request by the Regulation 22 Notice to provide the context of the building in situ, i.e. how it will look against the two existing businesses in operation on the site. This view, in our opinion, would show how out of scale this proposal will be in comparison to existing industrial operations, and how it will present a more industrial view within the area than what is currently present or has historically existed on this site.
- 4.6.5 It should be noted that Horsham is not in the same realms as Dundee or Wilton (near Middlesbrough) which are large conurbations with an industrial past. Horsham is a town of 49,000 residents with a market-based history. Its industrial base was the brickworks, not gigantic power stations bellowing out plumes of gases. Any such industrial development needs to remain in keeping with the location.
- 4.6.6 The WSCC note of February asked the applicant to clarify its statement that the design is based upon the 'surrounding landscape context' by describing how the context is reflected in the building. It is our view this remains a gap. The community engagement has failed to enable residents to feed into the design concept in any meaningful way. Views taken from many of the 55 residents who were aware of and attended the public exhibition run by the applicant were not routinely asked about the colour choices. They were certainly never exposed to the options described in the additional information presented by the applicant in response to the Regulation 22

Notice. The applicant does not allude to whole scale public consultation, and it should be recognised this has been minimal and not meaningful. This is suggestive of a developer who has shown and been perceived to have a high level of disregard to the opinions of the community within which it plans to operate. This perceived disregard has additionally played out in a lack of dedicated community-focused meetings held by the applicant.

4.7 Trees and vegetation

- 4.7.1 The February letter from WSCC asked the applicant to provide more detail in relation to the point in paragraph 3.4.5 of the Non-Technical Summary which states that “the existing soft landscaping on the site will be significantly enhanced within the new proposal...”. However, the proposed site plan shows a very constrained site and opportunities for enhancement appear to be limited. The applicant has failed to clarify, as requested, how ‘significant enhancement’ would be achieved.

Section 5: Additional Information to be considered as part of Ni4H Objection.

5.1 Energy from Waste/ “waste recovery” vs. disposal and its position on the Waste Hierarchy

5.1.1 The classification of this development proposal can only be done so by referring back to the EU Directive 2008/98/EC, the Waste Framework Directive. This Directive sets out the basic concepts and definitions related to waste management, such as definitions of waste, recycling and recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products.

5.1.2 From the “Guidelines on the interpretation of the R1 Energy Efficiency formula for incineration facilities dedicated to the processing of municipal solid waste according to Annex II of Directive 2008/98/EC on Waste¹” (European Commission) we note the following:

*“The Directive allows municipal waste incinerators **to be classified as recovery operations provided they contribute to the generation of energy with high efficiency** to promote the use of waste to produce energy in energy efficient municipal waste incinerators and encourage innovation in waste incineration. In this context, it is important to note that “recovery” means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy (Art 3 (15) of the WFD). The non-exhaustive list of recovery operations presented in Annex II of the WFD defines R1 as a recovery operation which is understood as “Use principally as a fuel or other means to generate energy”. It is clarified in footnote (8) that this includes incineration facilities dedicated to the processing of municipal solid waste (MSW) only where their energy efficiency is equal to or above:*

- *0.60 for installations in operation and permitted in accordance with applicable Community legislation before 1 January 2009,*
- *0.65 for installations permitted after 31 December 2008 “*

¹ Retrieved from <http://ec.europa.eu/environment/waste/framework/pdf/guidance.pdf>

- 5.1.3 We note that the proposal fails to demonstrate it meets the definition under R1 for the installation to be defined as a Recovery operation as we calculate the resultant energy to be around 25% and unlikely to achieve the 65% needed under the 2008 Directive. Although the applicant estimates it could produce 21 MW of electricity for the National Grid, it fails to demonstrate a demand for heat from either the industrial or residential population.
- 5.1.4 If the proposal is not recovery, it cannot be defined as a Recycling, Recovery and Renewable Energy development as this is misleading to the public. It is a recycling (Britaniacrest Recycling Limited) and burning of waste operation (new operator to be announced). The latter of which is defined under the same Directive as “disposal of waste by incineration on land” under D10-Annex I (1). It is our view that the Directive states that any disposal of waste must be subject to the proximity principle in the way a recovery operation does not have to be.
- 5.1.5 In support of our view further, we note from the Capel High Court Judgement (Case number CO/5684/2008 & 0510/2009 resided by Mr Justice Collins hearing Capel Parish Council vs Surrey County Council in relation to a very similar proposal for an incinerator which failed to meet the R1 criteria to be defined as “recovery”/Energy from Waste) that sections 39-41 are just as relevant to this application. The judgement notes, that similarly, the plans for a recovery operation was actually disposal in nature as a result of the R1 criteria not being met, and that Surrey County Council failed to apply the proximity principle and seek to ensure that waste would be disposed of at the nearest local installation. It cannot be argued that waste from the southern counties should be DISPOSED of “locally” in Horsham. Unless, the applicant can evidence that it can meet the R1 criteria and sufficiently recover energy from the burning waste, it should be REFUSED outright as it does not meet the description of what it intends, i.e. to “recover” waste. If the applicant wishes to resubmit an application for an incinerator/disposal of waste facility using thermal treatment, it will need to comply with the proximity principle and be sized according to the needs of West Sussex.
- 5.1.6 Our points under section 1 of our original objection, relating to the origins of the waste, therefore must be given greater emphasis. It is indefensible under the Directive, and the UK’s adoption of this Directive in its domestic waste legislation, to import/transport waste over long distances to dispose of it when by doing so there is an impact to the environment and human health. As previously stated, this contravenes West Sussex’s own policy as set out in its Waste Plan.
- 5.1.7 The other relevant aspect to whether this development proposal fails to meet the criteria for recovery rather than disposal of waste by incineration, is the waste hierarchy. Disposal is the least environmentally effective way of dealing with waste, marginally better than landfill. The applicant, by incorrectly suggesting this development is “recovery”, is seeking to suggest its waste treatment is higher up the waste hierarchy, which they fail to evidence by being unable to demonstrate it meets the R1 criteria.

5.2 Potential electrical cogeneration to the National Grid

5.2.1 Although there is a confident statement and forecast for electricity which might be produced from the incineration of waste, the applicant fails to provide any detail of the infrastructure required to make use of that electricity. We note in a pre-planning letter dated 20.12.15 from Michael Elkinton that the technical details should have been provided as part of the planning application, but they have not been submitted. We would seek answers to the following:

- Confirmation that there is agreement in principle that UK Power will provide demand of 18-20 MW continuously
- The details of the agreed voltage level to be generated, and the method of transmission, i.e. overhead lines, buried cables etc.
- Given that 18 MW represents about 30% of the Horsham area standing load, the agreed physical location where this demand will be provided by the grid.
- The intended route of the transmission method under point 2 above if the connection is remote, the intended route between the on-site substation and the locations under point 3 above.
- As requested on 20/12/15, which party will design the route under point 4 above and if further planning applications or wayleave requests are anticipated by either party.

5.3 Carbon Assessment

5.3.1 We note that the applicant has failed to provide supporting calculations setting out the carbon effects of start-up fuel and imported energy, or the use of generated energy from the plant. It also contains some inaccuracies, we believe:

- In its papers on the “Valuation of Energy Use and Green House gases”, the Dept. for Business, Energy and Industrial Strategy notes in Table 1 that the correct figure for the emissions avoided by production of electricity at the proposed incinerator would be 0.289 kg CO₂e/kWh for the current year (2017) and not 0.412015 as noted by the applicant. It should also be noted that this value reduces year on year. The Marginal Emission Factor for the first year will dictate the carbon performance of the incinerator (EfW, if it is such a development), at the point its demand for alternative electricity sources begins to reduce.
- The Assessment does not take into account the extent to which biogenic carbon is locked in at landfill. DEFRA's 'Energy recovery for residual waste - A carbon based modelling approach²' sets out guidelines. This should be offset against the methane emissions arising from landfill.

² http://randd.defra.gov.uk/Document.aspx?Document=11918_WR1910Energyrecoveryforresidualwaste-Acarbonbasedmodellingapproach.pdf

- 5.3.2 We are also of the view that over 50% of the CO₂ emitted as a result of incineration would not be decomposable, and therefore remains locked in the landfill. This has not been considered as a like-for-like comparison from the so-called energy from waste facility/disposal and landfill.
- 5.3.3 The failure of a correct comparison and calculation of the relative benefits of disposal or EfW methods against landfill is misleading. Its effect, we believe, is to overstate the so-called environmental benefits and should be clarified further.

5.4 Impact of Wake Vortices on the dispersal of pollutants in the local vicinity of the proposed incinerator

- 5.4.1 The impact of aircraft movement on the dispersal of pollutants/plume behaviour has not been adequately assessed.
- 5.4.2 Specifically, in the case of (Capel_Incinerator_Fact_Sheet)³ incinerator, there was no consideration of the impact of wake vortices which would result in driving the dangerous emissions back down to ground level and thus undoing the primary purpose of the excessively tall chimney stack/emission treatment technologies. Consideration of the consequences of wake vortices should also consider future changes to flight paths, increases in aircraft traffic and potential changes in government policy in expanding Gatwick Airport.

5.5 Additional information expected but not included in the application

- 5.5.1 We would like to highlight two key missing reports from this document set. For the incineration applications for Dundee ERF and Miller Hill RERC the applicants were requested to provide a Human Health Assessment and a Heat Export Infrastructure report/Electrical Infrastructure report. As the proposed development will be near arable farming/housing of other animals, such as horses, there should also be a consideration of impact on the food chain and on the welfare/ health of those animals.
- 5.5.2 The applicant has failed to clarify the basis on which a net overall energy efficiency is implied. The applicant should be asked to make available i) an Energy flow sankey diagram and ii) a heat flow diagram.

³ Retrieved from http://www.molevalley.gov.uk/media/pdf/o/c/Capel_Incinerator_Fact_sheet.pdf