

## Ni4H NON-TECHNICAL SUMMARY

### The Objection by Ni4H to the Permit Application Includes

#### 1. Introduction

- Lack of publicity of the public consultation by the Environment Agency, the two extensions to the deadline were not advertised in the local paper, letters were not sent to local residents and a public meeting was not held.
- Many application documents, appendices, drawings and references remain unavailable for review by the consultees, stakeholders, the Environment Agency and public.
- The most basic of errors in referencing, lead Ni4H to the conclusion that there are likely to be errors in data, calculations and modelling undertaken, over and above those already identified by Ni4H.

#### 2. Management of Activities

- Does Britaniacrest (a skip hire and waste management company) have the necessary experience and engineering expertise to build and manage the operation of this incinerator, without risk to our health or the environment?
- If the Land North of Horsham development of 2,750 new homes, schools and businesses cannot make use of the Combined Heat and Power (CHP), then Ni4H believes there will never be CHP provision from the proposed incinerator, and hence it should not be granted an Environmental Permit Variation, as the siting is not suitable for a district heating connection to be made.
- The electrical energy of 21.3 MW is not high considering the operating complications of an incinerator and the effect on the local residents of burning waste.
- Clarity is needed over the discrepancies in the proposed tonnage of hazardous waste, and of the non-hazardous waste tonnage destined for the proposed incinerator and the non-hazardous waste tonnage destined for the other operations.
- The mass balance diagram in Drawing 5 should be updated to give a clear picture of what the proposed level of hazardous emissions could be, and the health impacts, also showing the actual level of greenhouse gas emissions to show the real negative impact this incinerator would have on the UK's "net zero target".
- Ash and hazardous residues (around 23-29% of the waste burnt) contaminated with heavy metals and dioxins, will be transported off site for treatment or landfill.

#### 3. Operations

- The risk assessment is ill thought through and there is a lack of understanding of incineration plant best practice, consequently the risk of environmental impact and in particular fire and explosion is high.
- Crucial numbers that are quoted are frequently elsewhere contradicted, important parameters necessary to adequately define the technical and safe functioning of the proposed plant are often missing altogether, much of the information provided is too vague.
- Detailed explanation is needed of the processes and techniques that will be used to minimise risks to be ALARP (As Low As Reasonably Practicable).

#### 4. Emissions and Monitoring

- A detailed odour management plan needs to include the in-combination impact with the odours already experienced locally, using Best Available Techniques, not retrofitted if needed, as we know how much household refuse smells.
- A detailed Pest Management Plan is required.
- The 2016 Construction Dust Assessment needs to be updated, following the latest guidance, taking account of new research and advances in monitoring technology.

#### 5. Impacts summary

- Within 2km of the site there are 2 local wildlife sites, 15 ancient woodlands, 1 site of special scientific interest and Warnham Local Nature Reserve. Boldings Brook flows close to the site and down into Warnham millpond at the Reserve and on to the River Arun, the Application does not mention any impact on or measures to protect them.
- No plans are provided regarding species protection measures for bats (foraging and commuting), nesting birds or great crested newts or additional planting and protective measures for the ponds, grass verges and other areas to increase biodiversity.
- Harmful toxic pollutants including dioxins would be released from the 95m high chimney, in close proximity to existing and new housing, schools, farms and other businesses, rare butterflies at the Warnham Butterfly Fields and adjacent landfill site, farm animals, crops and wildlife.
- Sound monitoring in September 2020 was compared with the 2016 survey. However, due to Covid, flights to and from Gatwick airport were considerably reduced, many local businesses and residents were working from home with online meetings and restricted social lives, so aircraft and traffic noise were considerably reduced.
- Research shows incinerators release more CO<sub>2</sub> than predicted at planning stage and breaches of incinerator emission limits have occurred.
- An outline site closure plan is needed of actions at the end of the operational lifetime of the incinerator, or decommissioning for any other reason, to safely restore the land.

#### 6. BAT Summary (Best Available Techniques) – This section in the Application is missing.

- A catalytic bag filter system should be used to remove dioxin/furans and reduce nitrogen oxide emissions, in addition to the powdered activated carbon for mercury removal.

#### 7. Conclusion

- When all these points are considered, Ni4H contends that the current Permit must not be varied to allow the Applicant to operate an incinerator at the Wealden Works site.
- If, contrary to Ni4H's objection, the permit is allowed, Ni4H contends that certain conditions should be included, which may mitigate some of the concerns raised by local residents. Ni4H reserves the right to propose or suggest modifications to permitting conditions, as further information becomes available.