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Planning Case Officer: Mr Sam Dumbrell
West Sussex County Council
County Planning,
West Sussex County Council,
County Hall,
Chichester
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planning.applications@westsussex.gov.uk

4 April 2018

Dear Sir,

Consultation response, submitted for and on behalf of CPRE Sussex, objecting to:

WSCC/015/18/NH

Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure

Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12

Please note that this representation, which considers specific environmental issues, is to be followed by a second representation from CPRE Sussex, which will cover other aspects of the application.

What pollutants would be emitted by the proposed facility and in what quantities and where these pollutants would come to earth and their impact on people and the environment, including flora and fauna, biodiversity and ecology, are crucial issues in the deciding of this application – and therefore whether the application, if permitted, would be fully compliant with West Sussex Waste Local Plan (WSWLP), April 2014, Policy W19: Public Health and Amenity and Policy W14: Biodiversity and Geodiversity and Horsham District Planning Framework Policy 24 Strategic Policy: Environmental Protection.

CPRE Sussex is concerned for the following reasons:

1. Toxicity data for pollutants emitted by the facility seems not to have been included in the application bundle; and how the mix of the various pollutants might impact on human health seems not to have been assessed.

1.1 Predicted pollutants that could or would be emitted by the facility are given in Volume 1, Chapter 7. Air Quality and Odour and in Appendix 7.5: Sensitive Receptor Results. According to these documents they are:

Nitrogen dioxide, Carbon monoxide, Sulphur dioxide, Particulates, Particulates, Hydrogen chloride, Hydrogen fluoride, Arsenic, Antimony, Cadmium, Chromium, Cobalt, Copper, Lead, Manganese, Mercury, Nickel, Thallium and Vanadium.

1.2 We are concerned that the applicant's Volume 1, Chapter 13. Population and Health' does not include toxicity data for identified pollutants and neither does it provide a hazard evaluation of how the mix of the various pollutants might impact on human health and the environment, including biodiversity and ecology, cumulatively over time.

1.2.1 Please note that according to 'Chief Medical Officer 2017 Health Impacts of All Pollution - what do we know?' (page 2) "*Mixtures and complex chemical combinations are providing new challenges for risk assessment*".

2. Mapping, showing where pollutants emitted by the proposed facility would come to earth and the extent of resulting ground fall/downwind-hazard areas ought to have been provided for public scrutiny, as part of the consultation.

2.1 Although the application bundle includes wind roses, for years 2011, 2012, 2013, 2014 and 2015, it appears not to include a map or maps showing downwind-hazard areas - where pollutants emitted by the facility would come to earth.

2.2 We note that the 'wind roses' data was obtained at Charlwood, not from the site of the proposed facility.

2.3 Mapping showing where pollutants emitted by the proposed facility would come to earth and the extent of resulting ground fall/downwind-hazard areas in our view ought to have been provided for public scrutiny as part of the consultation.

3. Did the Terrain Modelling employed replicate the actual terrain and, if it did, up to what distance from the site of the proposed facility?

3.1 At paragraph 7.3.26, of Volume 1, Chapter 7. Air Quality and Odour, it is stated that "*The presence of elevated terrain can significantly affect (usually increase) ground level concentrations of pollutants emitted from elevated sources such as stacks, by reducing the distance between the plume centre line and ground level and by increasing turbulence and, hence, plume mixing. A complex terrain file has been used within the model*".

3.2 What is not explained is whether the model employed replicated the actual terrain, in which the proposed facility is located.

3.3 This is an important consideration for the public consultation and should be declared.

4. The cumulative impact of dioxins and of any other persistent pollutants emitted by the facility, after coming to earth, seems not to have been assessed.

4.1 According to the 'Annual report of the Chief Medical Officer 2017 Health Impacts of All Pollution - what do we know?', (page 7: 21st Century Pollutants):

"Dioxins and PCBs fall within a class of chemicals listed as persistent because they do not degrade in the environment. They also have little solubility in water, therefore tend to accumulate in fat sources and concentrate up the food chain. Though historically more than 90% of exposure has been through the food chain⁸ this has been falling in recent years. Their metabolism and excretion from the body is also slowly adding to their ability to accumulate in humans, animals and fish". And that

"Since the 1980's dioxins have been known to elicit many of their toxicological effects via binding to a specific intracellular protein, the aryl hydrocarbon receptor (AHR).¹²⁻¹⁵ What had not been known until recently is that this mechanism is important in the activation of immune system cells and is a link to autoimmune diseases (see Figure 3.2).¹⁶ There may therefore be a link between exposure to these chemicals in the environment and the substantial rise that has been observed in autoimmune diseases over the last decade".

4.2 Unfortunately, the cumulative impact of dioxins and of any other persistent pollutants emitted by the facility after coming to ground seems not to have been assessed.

5. How pollutants emitted by the facility, individually, collectively, and cumulatively over time, could or would impact on farmland and livestock and the natural environment, including habitats, biodiversity and ecology, seems not to have been assessed.

5.1 This apparent omission reinforces the need for inclusion in the application bundle of mapping showing where pollutants emitted by the proposed facility would come to earth and the extent of the resulting ground-fall/potential downwind-hazard areas.

In conclusion, we are concerned that the apparent omissions and shortfalls identified above, in respect of the pollutants that would be emitted by the proposed facility, prevent proper assessment being made of whether the application, if permitted, would be fully compliant with West Sussex Waste Local Plan (WSWLP), April 2014: Policy W19: Public Health and Amenity and Policy W14: Biodiversity and Geodiversity, and Horsham District Planning Framework: Policy 24 Strategic Policy: Environmental Protection.

Accordingly, CPRE Sussex asks that that the application be refused.

Yours faithfully,

R F Smith DPhil, BA (Hons), FRGS

Trustee CPRE Sussex

Copy to Director CPRE Sussex