

Re: Planning application LW/462/CM(EIA) - Municipal Waste Incinerator at North Quay, Newhaven.

05 March 2007

Dear Secretary of State

Following the recent approval of this planning application by East Sussex County Council (ESCC) I am writing to ask you to call-in this decision for examination at a Public Inquiry.

ESCC have already advertised this application as a departure from local development plans because of its adverse visual impact on its adjacent Area of Outstanding Natural Beauty (AONB) and the loss of areas for the storage and processing of crushed rock and marine aggregates at North Quay.

I would further add to these concerns;

- incinerators have been shown to pollute surrounding areas with cocktails of toxic chemicals that have been linked to cancer, heart disease, respiratory problems, immune system defects, increased allergies and birth defects. (1)

- the construction and operation of an incinerator will have a massive environmental impact on the local community, and will tie Brighton and Hove and East Sussex councils into a long-term contract to burn waste - rather than improve recycling rates.

- Additionally, reports have shown that electricity-only (such as that proposed at Newhaven) emit 33% more fossil CO2 than gas-fired stations (2)

- 30% of household waste is food. This should be composted; yet the contract allows this to be incinerated.

- No consideration of the impact of the proposal on areas of special environmental protection is provided in the context of alternative means of delivering a suitable waste management solution.

- North Quay Road and North Way junction show traffic impacts beyond the 5% threshold limit for traffic increases as a result of a permitted development.

- The proposal conflicts with the Council's planning policies. Policy NH 24 of the Local Plan states that planning permission will only be granted for port-related uses.

- The proposal does not contribute to sustainable development, which PPS 1 suggests planning authorities should promote through urban regeneration "to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for people living in those communities".

- The application does not show that there is an overriding need to be located at North Quay, Newhaven in preference to a site outside the flood plain. This is in breach of PPG25.

- The proportion of municipal waste to be burned (54%) is too large and will prevent higher recycling and composting levels in the future. This is counter to the need to move waste up the waste hierarchy as required by PPS10.

- The incinerator would lead to an unacceptable adverse impact on the adjoining Sussex Downs AONB and South Downs National Park and their settings, which has not been given sufficient consideration and cannot be mitigated.

- Flood risk to surrounding users of land is worsened as a result of the proposal

In my view the proposal conflicts with national policies on important matters and will have significant effects beyond the immediate locality. Additionally the issue is of demonstrable public controversy – over 16,000 letters of objection have been submitted.

I am fundamentally opposed to the principal of burning – rather than recycling, reusing and reducing – our waste. There is no need to incinerate waste at all if we improve recycling rates and cut waste by adopting the principles of a 'zero-waste strategy', such as that employed successfully in Canada and parts of Australia .

Yours sincerely



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(1) See Table 1, 'Incineration & Health Issues', Friends of the Earth
http://www.foe.co.uk/resource/briefings/incineration_health_issues.pdf

(2) See 'Incineration & climate change', Friends of the Earth
http://www.foe.co.uk/resource/briefings/dirty_truths.pdf