

FORD ENERGY RECOVERY FACILITY AND
WASTE SORTING AND TRANSFER FACILITY,
FORD CIRCULAR TECHNOLOGY PARK



PLANNING
SUPPORTING STATEMENT

**FORD ENERGY RECOVERY FACILITY AND WASTE SORTING AND TRANSFER
FACILITY, FORD CIRCULAR TECHNOLOGY PARK**

PLANNING SUPPORTING STATEMENT

FORD ENERGY FROM WASTE LTD, GRUNDON WASTE MANAGEMENT LTD,

VIRIDOR WASTE MANAGEMENT LTD

JUNE 2020



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Summary

Introduction

- S1 Ford Energy from Waste Limited, Grundon Waste Management Limited and Viridor Waste Management Limited (the joint applicants) have submitted a full planning application to West Sussex County Council (WSSCC) for the construction and operation of an Energy Recovery Facility (ERF) and Waste Sorting and Transfer Facility (WSTF) on land at Ford Circular Technology Park, Ford, West Sussex.
- S2 The proposed facilities are located at a site allocated for strategic waste management use in an up to date waste local plan, and will help to address a current shortfall in sustainable waste management capacity in their catchment. They will help to meet the objectives of waste planning policy including net zero waste to landfill, and national and regional self-sufficiency.
- S3 The ERF will also recover energy from waste that would otherwise be sent to landfill or out of the area (or the country) for recovery elsewhere. It will make an important contribution to electricity generation capacity (28 MW for export to the national grid) and brings potential for combined heat and power export to nearby businesses and homes. This is a low carbon form of energy generation.
- S4 The full planning application comprises a comprehensive suite of drawings and documents, providing extensive information on a range of social, economic and environmental subjects to explain and support the proposals.
- S5 This document provides a summary of the main elements of the planning submission.

Key elements of the proposals

- S6 The proposed replacement Ford ERF and WSTF provide the following:
- A single stream Energy Recovery Facility (ERF) with a capacity to treat up to 275,000 tonnes per annum (tpa) of residual commercial and industrial (C&I) and municipal solid waste (MSW).
 - A Waste Sorting and Transfer Facility designed to treat up to 20,000 tpa, mainly by bulking recyclables and transferring them on for further processing elsewhere, but including an element of sorting of some mixed loads with the residual fraction going into the ERF
 - A steam turbine generator that will generate approximately 31 MW of electrical power, of which approximately 28 MW will be exported to the local electrical distribution network and the remainder used within the ERF and WSTF. It will also be “CHP ready”, with the ability to export heat in the form of steam or hot water should an off-site recipient(s) be identified.
 - Buildings and structures ancillary to the ERF and WSTF include gatehouses, weighbridges, air cooled condensers, maintenance workshops, portacabins, heat stations, storage tanks, bin stores, HGV parking, staff and visitor parking and internal roads.
 - Facilities in the ERF that will be available to host groups of visitors, with access by appointment.

- Bunds and landscape planting located along the site boundary will screen the lower part of the buildings and the activity on the site at ground level, whilst providing enhanced biodiversity and tying in with the adjacent natural landscape features.
- A design of a high quality that provides a confident and positive statement in terms of the quality of the architecture and the reflection of local character, distinctiveness and sense of place in materials, site layout and building form.

The planning application

- S7 Extensive information has been submitted in accordance with national and local requirements, to support the application and to provide sufficient information for the waste planning authority and their consultees to fully understand the proposals and assess their implications.
- S8 This includes reflecting the advice received in pre-application meetings with the waste planning authority, including that received on the scope of the Environmental Statement. It also includes content with reference to the validation list pertaining to planning applications of this type.

The site

- S9 The proposed development will provide for the comprehensive redevelopment of the Ford site. Formerly part of an airfield, the site has a more recent history of industrial and waste management operations, with Grundon currently operating a waste transfer station (WTS) on the site.
- S10 There is already an extant planning permission for an energy from waste facility at the site, using gasification technology and with a treatment capacity of about 140,000 tpa, alongside a materials recycling facility (MRF) that would treat 60,000 tpa. To date, these facilities have not been built. The existing WTS operating at the site normally treats about 20,000 to 25,000 tpa.
- S11 The access to the site has recently been improved by provision of a new access road, allowing the closure of previous access arrangements. The new road provides a better access and a s106 legal agreement allows for up to 240 HGV movements in and out of the site per day, and 120 in and out per day on Saturdays. This access will be used by the new facilities now proposed, and they will operate within these agreed HGV movements.
- S12 The site is allocated in Policy W10 in the up to date West Sussex Waste Local Plan (WLP) 2014 as a strategic site for waste management use. The allocation does not exclude any particular type of facilities or technology, which is a matter for the waste management industry and the market.
- S13 The existing and allocated waste management use of the site is safeguarded in the WLP and the Arun Local Plan 2018, meaning that other types of development in the area should not prevent or prejudice the existing and future allocated waste management uses.

Planning policy and environmental considerations

- S14 The proposals are consistent with planning policy at all levels. The ERF and WSTF will enable the sustainable treatment of mixed residual waste supporting the

diversion from landfill. The proposals will deliver key objectives of national policy and strategy, as well as meeting needs identified in the WLP. They will assist with delivering the waste hierarchy, and will contribute to self-sufficiency (in terms of both energy recovery and sustainable waste management). They will recover value from residual waste.

S15 The WSTF and ERF will use an allocated strategic waste site to help West Sussex to meet its objectives of maintaining net self-sufficiency in managing the transfer, recycling and treatment of waste generated in the county; to have network of facilities to minimise transportation of waste; and working towards zero net waste to landfill by 2031. The proposal is wholly compliant with the adopted waste local plan (WLP).

S16 The ERF also contributes to the national need to provide energy infrastructure to assist in meeting energy demand and to contribute to security of supply. The ERF will generate about 31 MW of electricity and export about 28 MW of this to the grid. It will also generate heat that can be exported to potential offsite heat customers once such are identified and secured. The energy produced by the ERF is low carbon, and there will be solar photovoltaics panels on both the WSTF and the ERF buildings, so the proposals therefore also contribute to national commitments to increase energy generation from renewable and low carbon sources.

S17 The WLP also sets out a series of principles that are expected to be addressed in the development of the site. All of these principles have been addressed and satisfied. The design of the proposals has also had regard to consultation with WSCC officers and local community representatives and site neighbours. Environmental issues have also informed and influenced the design of the facilities.

S18 The planning application is accompanied by an Environmental Statement (ES) that reports the findings of the environmental impact assessment (EIA) of the proposals. The ES reports on the assessment of environmental effects under these headings:

- Air quality, odour and dust
- Carbon and greenhouse gas emissions
- Health
- Community and social effects
- Cultural heritage
- Ground conditions and the water environment
- Landscape and visual effects
- Natural heritage
- Noise and vibration
- Traffic and transport.

- S19 The non-technical summary of the ES, which accompanies this submission, has outlined the findings of the EIA. The proposals have taken account of the findings of the technical assessments and responded positively to the matters that were identified.
- S20 In summary, the proposed ERF and WSTF will lead to changes to the local environment, but a range of measures will be put in place to minimise potential adverse effects and to enhance beneficial effects. The few adverse effects remaining after mitigation are limited to effects on some views towards the site from the local area, some of which also affect the setting of designated heritage assets; and a night time noise effect on a single dwelling near the site.
- S21 It is considered that these effects are not unacceptable in the context of the strong policy support for the proposals and the high quality of the proposals.
- S22 The proposed mitigation measures and the residual effects of the proposals that are predicted to remain after mitigation are summarised in more detail in chapter 16 of the ES.

Consultation

- S23 A Statement of Community Involvement (SCI) has been submitted with the planning application providing details of the pre-application public consultation that has been undertaken by the applicants.
- S24 The issues raised have been used to help shape the proposals as they have developed towards the final application for submission.
- S25 Many of the issues raised in feedback from the public consultation are addressed in the mitigation built into the proposals, such as the compliance with emission standards, the design of the buildings and layout, and holding to the existing HGV traffic limits and routing plan. The applicants are committed to maintaining an ongoing dialogue with stakeholders and other interested parties as the application progresses through the planning process.

Conclusion

- S26 The overall conclusion is that the proposed ERF and WSTF will:
- Make a significant contribution towards meeting national, regional and local waste policy by providing efficient and modern facilities for the recovery of energy from waste, recycling and waste transfer, helping to meet identified shortfalls at a site allocated for waste management use
 - Provide appropriate treatment capacity required to manage the residual municipal, commercial and industrial waste arisings from within the waste catchment area, including West Sussex and neighbouring historic counties, whilst also supporting recycling targets
 - Reduce the amount of waste that is disposed of to landfill (the least sustainable solution), contributing positively to achieving landfill diversion targets and zero waste to landfill
 - Provide an integrated and efficient waste management solution, incorporating both ERF and WSTF at one location

- Helping to ensure that waste is dealt with in proximity to where it arises as part of a national, regional and local network of facilities
 - Generate low carbon/renewable electricity, 31 MW of electrical power, of which approximately 28 MW would be exported to the national grid, (enough to power about 68,000 homes)
 - Provide predictable, controllable energy, thereby contributing to diversity and security of supply
 - Meet the requirements of national, regional and local policies in relation to climate change and energy, both in terms of its own use of energy, its electricity generation, and its ability to provide CHP
 - Safeguard the potential to provide heat to local communities and businesses as part of a future district heating network, subject to contracts and off-site infrastructure being in place
 - Broadly conform with development plan policy at all levels
 - Use a site allocated for strategic waste management facilities, in accordance with planning policy
 - Provide a comprehensive redevelopment of a brownfield site
 - Provide confident buildings of a high quality, striking and exemplar design that respects local character, to house safe and modern facilities
 - Provide jobs during construction and operation, with opportunities for training and apprenticeships, contributing to a diverse local economy
 - Not give rise to any unacceptable environmental impacts.
- S27 For these reasons, the planning application should be approved. This will secure essential capacity for waste management and low carbon/renewable energy generation, and provide the wider benefits summarised above.

1.0 INTRODUCTION

- 1.1 This Planning Supporting Statement (PSS) is part of a set of documents submitted in support of an application for planning permission by Ford Energy from Waste Limited, Grundon Waste Management Limited and Viridor Waste Management Limited (the applicants) to West Sussex County Council (WSCC) for the construction and operation of an Energy Recovery Facility (ERF) and Waste Sorting and Transfer Facility (WSTF) on land at Ford Circular Technology Park, Ford, West Sussex.
- 1.2 This document describes the reasons for the planning application, summarises the main elements of the proposed ERF and WSTF, and considers the proposed development in the context of the development plan and other relevant material considerations.
- 1.3 The document establishes the case for the proposals and provides West Sussex County Council (WSCC), as Waste Planning Authority (WPA) and Local Planning Authority (LPA), with a summary of the main information that it requires to determine the planning application.
- 1.4 Much of the detail required by WSCC is contained in the accompanying Environmental Statement (ES) and Design and Access Statement (DAS), or other supporting documents. Duplication of information between documents has been minimised. Consequently, this document should be read in conjunction with these supporting documents.

The applicants

- 1.5 The planning application is made jointly by Ford Energy from Waste Limited, Grundon Waste Management Limited, and Viridor Waste Management Limited, as joint applicants.
- 1.6 Ford Energy from Waste Limited (Ford EfW) is a joint venture between Grundon Waste Management Limited (Grundon), the UK's largest family-owned waste management company and Viridor Waste Management Limited (Viridor), one of the largest resource management companies in the UK and part of the FTSE 100 Pennon Group plc.
- 1.7 This is the second time that Grundon and Viridor have worked together to develop a modern, state-of-the-art, energy recovery facility that diverts non-recyclable waste from local authorities and businesses away from landfill, the existing example being at Lakeside near Slough.
- 1.8 The two businesses have a combined experience of 155 years in waste management, recycling and environmental services.
- 1.9 Grundon owns and operates the Ford Circular Technology Park site. The site already benefits from planning permission for a thermal treatment facility with energy recovery, using gasification technology, to treat about 140,000 tonnes per annum (tpa) of residual waste. This was granted in 2015 by West Sussex County Council. The permission also allows waste recycling and transfer facilities treating about 60,000 tpa of residual waste. Currently the site is occupied by a waste transfer station that normally treats about 20,000 to 25,000 tpa of residual waste.

- 1.10 Viridor has operated a MRF nearby, to the south of the site, for eleven years. This MRF already manages about 100,000 tonnes per annum of recyclable waste from homes across West Sussex through a contract with WSCC. Viridor also owns and operates eight ERFs, with one other under construction, and a number of other waste facilities across the UK.
- 1.11 Ford EfW Limited (a joint venture) will own and operate the proposed ERF. Grundon Waste Management is the sole owner and operator of the existing WTS facilities and will continue to be the sole owner and operator of the proposed WSTF.

Environmental impact assessment

- 1.12 The proposed development falls within Schedule 1 of the EIA Regulations and the application is accompanied by an Environmental Statement (ES). This provides detailed information about the proposals, the site and potential environmental effects.
- 1.13 An EIA scoping opinion has been provided by WSCC, and the scope and content of the ES reflects this.
- 1.14 Ford EfW Limited has appointed a team of specialist consultants to undertake this work. Many of the technical appendices to the ES comprise detailed reports from these specialist consultants. The ES identifies various mitigating measures to reduce environmental effects.

Environmental permit

- 1.15 Whilst positive determination of this planning application will enable construction of the ERF and WSTF to proceed, before they can be operated they will require authorisation from the Environment Agency under the terms of the Environmental Permitting Regulations 2010. This authorisation will set out environmental standards for the operation of each plant, mainly relating to control of emissions to the atmosphere.
- 1.16 An application for two environmental permits will be submitted shortly after this planning application, one for the ERF operated by Ford EfW Ltd, and another for the WSTF operated by Grundon.
- 1.17 Since the planning and environmental permit applications are submitted under separate regulations, the granting of planning permission is not dependent on the granting of the environmental permits, and vice versa.

The planning application

- 1.18 This is a full detailed planning application, and includes the plans, drawings and documents listed below. The content reflects the requirements of legislation, the national planning application validation checklist, and the West Sussex local validation list. It also reflects pre-application discussion with officers of the Waste Planning Authority.
- Completed application form including ownership/ agricultural holdings certificate and notice

- Planning application drawings, as set out in table 1.1 below
- Planning supporting statement
- Environmental statement (see detail below*)
- Design and access statement
- CHP-ready assessment (including R1 assessment)
- Arboricultural impact assessment
- Statement of community involvement
- Habitat regulation assessment (screening)
- Aerodrome safeguarding statement
- Lighting plan (see Ramboll drawing 00210 Rev P02)
- Outline surface water drainage strategy (see Ramboll drawing 00001 Rev P01).

**Environmental statement (ES), includes:*

Non-technical summary

<i>Chapter 1</i>	<i>Introduction</i>
<i>Chapter 2</i>	<i>Site description</i>
<i>Chapter 3</i>	<i>Proposed development</i>
<i>Chapter 4</i>	<i>Alternatives</i>
<i>Chapter 5</i>	<i>Environmental issues and methodology</i>
<i>Chapter 6</i>	<i>Air quality, odour and dust</i>
<i>Chapter 7</i>	<i>Carbon and greenhouse gas emissions</i>
<i>Chapter 8</i>	<i>Health</i>
<i>Chapter 9</i>	<i>Community and social effects</i>
<i>Chapter 10</i>	<i>Cultural heritage</i>
<i>Chapter 11</i>	<i>Ground conditions and the water environment</i>
<i>Chapter 12</i>	<i>Landscape and visual effects</i>
<i>Chapter 13</i>	<i>Natural Heritage</i>
<i>Chapter 14</i>	<i>Noise and vibration</i>
<i>Chapter 15</i>	<i>Traffic and transport</i>
<i>Chapter 16</i>	<i>Summary tables</i>
<i>Glossary</i>	
<i>Technical appendix A</i>	<i>EIA Scoping</i>
<i>Technical appendix B</i>	<i>Competent experts involved in the preparation of the ES</i>
<i>Technical appendix C</i>	<i>Air quality, odour and dust</i>
<i>Technical appendix D</i>	<i>Carbon assessment</i>
<i>Technical appendix E</i>	<i>Human health risk assessment</i>
<i>Technical appendix F</i>	<i>Cultural heritage</i>

<i>Technical appendix G</i>	<i>Ground conditions and the water environment (including FRA and surface water drainage)</i>
<i>Technical appendix H</i>	<i>Landscape and visual impact assessment</i>
<i>Technical appendix I</i>	<i>Natural heritage</i>
<i>Technical appendix J</i>	<i>Noise and vibration</i>
<i>Technical Appendix K</i>	<i>Traffic and transport assessment</i>
<i>Technical appendix L</i>	<i>Outline construction environment management plan</i>

TABLE 1.1 List of drawings

Drawing ref:	Title	Scale
TOR-E010	Planning application boundary	1:10000@A3
264101/E03	Site location plan	1:2500@A3
<i>Existing site</i>		
PL100	Existing Site Plan	1:1000@A1
PL101	Existing Site Layout	1:500@A1
<i>Proposed site layout</i>		
PL105	Proposed Site Plan	1:1000@A1
PL106	Proposed Site Layout	1:500@A1
PL107	Proposed Masterplan	1:1000@A1
PL108	Fencing Layout	1:500@A1
<i>Proposed floor/roof plans</i>		
PL110	ERF Ground Floor Plan +0.00m	1:250@A1
PL111	ERF Level 1 +5.00m	1:250@A1
PL112	ERF Level 2 +10.00m	1:250@A1
PL113	ERF Level 3 +15.00m	1:250@A1
PL114	ERF Level 4 +20.00m	1:250@A1
PL115	ERF Level +41.47m	1:250@A1
PL116	ERF Roof Plan	1:250@A1
PL120	WSTF Ground Floor Plan +0.00m	1:250@A1
PL121	WSTF First Floor Plan +4.00m	1:250@A1
PL122	WSTF Second Floor Plan +8.00m	1:250@A1
PL123	WSTF Roof Plan	1:250@A1
<i>Sections</i>		
PL200	Existing Site Sections	1:500@A1
PL201	Proposed Site Sections	1:500@A1
<i>Main building elevations</i>		
PL300	ERF North Elevation	1:250@A1

PL301	ERF East Elevation	1:250@A1
PL302	ERF South Elevation	1:250@A1
PL303	ERF West Elevation	1:250@A1
PL305	WSTF North and East Elevations	1:250@A1
PL306	WSTF South and West Elevations	1:250@A1

Site elevations

PL310	North Site Elevation	1:500@A1
PL311	East Site Elevation	1:500@A1
PL312	South Site Elevation	1:500@A1
PL313	West Site Elevation	1:500@A1

Ancillary building/structure elevations

PL350	ACC Elevations	1:200@A1
PL351	ERF Weighbridge Gatehouse Plans and Elevations	1:100@A3
PL352	WSTF Weighbridge Gatehouse Plans and Elevations	1:100@A3
PL353	ERF Fire Water Tank Elevations	1:100@A3
PL354	ERF Pump House Plan Elevations	1:100@A3
PL355	Diesel and Ammonia Tank Elevations	1:100@A1
PL356	Substation and Transformer Elevations	1:100@A1
PL357	Wash Area Elevations	1:200@A1
PL358	WSTF Fire Water Tank Elevations	1:100@A3
PL359	WSTF Pump House Plan Elevations	1:100@A3
PL360	Fuel Tank and Adblue Elevations	1:100@A3
PL361	ERF Cycle Shelter Plan and Elevations	1:100@A3
PL362	WSTF Cycle Shelter Plan and Elevations	1:100@A3
PL363	Fencing Elevations	1:100@A3

Landscape design

2829-01-SK002	Landscape Design	1:500@A1
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Lighting

00210 Rev P02	Lighting lux levels	Not to scale
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Outline surface water drainage strategy

00001 Rev P01	Outline surface water drainage strategy	1:1200@A3
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Additional illustrative drawings (for information, not for approval)

IL500	Traffic Movement Drawing	1:500@A1
IL510	Vehicle Tracking Layout	1:500@A1

2.0 SITE AND SURROUNDINGS

Site description

- 2.1 The site, known as Ford Circular Technology Park, is currently owned by Grundon and is located at the former Ford Airfield in Arun District, West Sussex. It is an existing waste management site with planning permission for a materials recycling facility (MRF) with a capacity of 60,000 tonnes of waste per annum (tpa), and a residual waste treatment facility (RWTF), with a capacity of 140,000 tpa and using a gasification technology to recover energy from the residual waste inputs (application reference: WSCC/096/13/F).
- 2.2 The approved facilities have not yet been built, although the permission has been implemented and the site currently operates as a WTS that typically handles between 20,000 and 25,000 tpa) although currently it handles about 50,000 tpa on a temporary basis. This is because a fire at another facility means that waste from there is being temporarily diverted to the Ford site whilst the damaged site is being repaired.
- 2.3 Site access until recently was via Yapton Road and Rollaston Park to the west (for inbound vehicles) and to Ford Road to the east via a haul road passing north of Rodney Crescent (for outbound vehicles). However, a new access road has been created to Ford Road (application reference: WSCC/027/18/F) that replaces the previous access arrangements, so both of the previous accesses are now closed to site traffic. The new road came into use in January 2020.
- 2.4 The application site covers an area of 7.11 hectares. It is partially used for the existing WTS operations and partially vacant. The existing WTS building is located towards the centre of the site and portacabins, parking, weighbridge and containers associated with this operation are situated to the west of the WTS. There are two vacant former hangar buildings towards the north of the site and a large area of hardstanding is situated towards the south and east of the site. The site is flat and approximately 6.7 m above ordnance datum (AOD).
- 2.5 The application site boundary also encompasses the new access road leading from the south east corner of the site to Ford Road, and a small area of hardstanding to the north west, currently unused.

Surrounding land uses

- 2.6 The site is surrounded by flat agricultural land to all sides other than to the south and south west, where the adjacent land is in use for recreation (playing pitches). The Ford Wastewater Treatment Works (WWTW), operated by Southern Water, and a Materials Recycling Facility (MRF), operated by Viridor, lie beyond the playing pitches to the south, and the Flying Fortress indoor play area and the Arun Arena indoor football facilities lie beyond the pitches to the south west. Further west are the Ford Airfield Industrial Estate and residential properties in Rollaston Park on the edge of Yapton. To the east, beyond agricultural land, are residential properties in Rodney Crescent and an art studio (the Mill Studio). To the north is agricultural land beyond which are some residential and employment properties on Ford Lane.

- 2.7 The closest residential properties to the edge of the main site (not including the access road) are at Ford Lane approximately 210m to the north east; Rodney Crescent approximately 410m to the east, Nelson Row approximately 500m to the southeast; and Rollaston Park approximately 490m to the west. The wider locality includes the settlements of Yapton to the west, and Climping to the south.
- 2.8 Land to the south on the former Ford Airfield runways and adjacent land is used as a market or for car boot sales on Thursdays, Saturdays and Sundays.
- 2.9 The site is surrounded by a strategic housing allocation identified in both the adopted Arun District Local Plan (site SD8) and the Ford Neighbourhood Plan. There is currently an outline planning application lodged with Arun District Council for the development of 1500 new homes, a quantity of employment buildings, and associated community facilities and access arrangements on part of the site SD8 allocated area (application reference F/4/20/OUT) surrounding the ERF/WSTF application site.
- 2.10 There is also a current planning application with Arun District Council for reconfiguration of the Ford Airfield market arrangements (application reference ref. F/5/20/PL).
- 2.11 There are several public rights of way in the vicinity of the site to the north, including footpaths 366 and 366/1, which pass north-south to Ford Lane, and footpath 200/3, which leads from Ford along the site's north eastern edge and joins footpath 363, which leads to Yapton.

Planning and environmental designations

Planning

- 2.12 With the exception of the access road and a small area to the north west, the application site is identified as a strategic waste site in policy W10 of the West Sussex Waste Local Plan (April 2014), as shown in policy map 1 of that document, (Site north of Wastewater Treatment Works, Ford). This means that the site is acceptable, in principle, for the development of waste management facilities subject to consideration against other policies of the plan and development principles set out in the supporting text to the policy.
- 2.13 Policy map 2 (Arundel, the Six Villages and Surrounding Area) of the Arun Local Plan 2011-2031 (July 2018) identifies the main part of the site as a County Waste Local Plan strategic waste site allocation. The existing access road passes across a strategic housing allocation (policy SD8) that surrounds the application site. The entire application site is within the built-up area boundary as defined on policy map 2. Policy SD SP2 applies within this boundary, and states that development will be permitted subject to consideration against other policies of the local plan.

Environmental features and designations

- 2.14 There are no environmental or cultural heritage designations on site. There are some features of interest in the surrounding area, summarised below.
- 2.15 There is a scatter of listed buildings in Ford, Yapton, Climping and surrounding countryside, and Scheduled Monuments at Climping and Tortington.

- 2.16 There are no watercourses on or near the site; the nearest is a field drain approximately 440 m to the east, which drains into the River Arun around 900 m to the east of the site.
- 2.17 The site is in flood zone 1 and is largely at very low risk of surface water flooding, although there are small areas of low to medium risk in the west and north.
- 2.18 The site is not within a groundwater source protection zone or drinking water protected / safeguard area. It is underlain by bedrock that is classified as a principal aquifer of intermediate groundwater vulnerability. The superficial deposits beneath the site are classified as a secondary A aquifer.
- 2.19 The site is not covered by an air quality management area.
- 2.20 The site is not covered by any landscape designations, but it is approximately 2.2 km to the south of the South Downs National Park. The Yapton Church Lane and Main Road / Church Road conservation areas are approximately 1 km and 1.3 km away.
- 2.21 The site lies within the Chichester to Yapton Coastal Plain landscape character area, as identified in WSCC's (2003) West Sussex Landscape Character Assessment. Key characteristics of this area include a lowlying, flat, open landscape, a low density of hedgerows and hedgerow trees with occasional shelterbelts, large-scale arable farming and market gardening, long views to Arundel and the Downs, frequent urban fringe influences of horse paddocks, light industry and disused airfields, with busy minor and major roads, and light industry in the countryside at Ford and Tangmere.
- 2.22 The Arun Landscape Study (2006) identifies local landscape character areas in the district. The site lies within character area 29: North of Yapton Coastal Plain and the report notes that Ford Lane provides an urban influence on this character area, which comprises predominantly arable fields of varying size and enclosure, with parkland and recreation adjacent to Yapton. It also states that the large industrial buildings on the disused aerodrome, together with Ford prison, have an urbanising impact on the adjacent arable landscape.
- 2.23 The Duncton and Bignor Escarpment Special Area of Conservation (SAC), an international nature conservation designation, lies approximately 9.8 km to the north. There are two nationally designated nature conservation sites within 5 km of the site: Climping Beaches Site of Special Scientific Importance (SSSI), 2.8 km to the south east, and Arundel Park SSSI, 4.2 km to the north east. There are no locally designated nature conservation sites within 2 km of the site.

Planning history

- 2.24 The application site has been subject to previous development proposals. This is summarised below.
- 2.25 The planning history dates back to 1967 when planning permission was granted on land adjacent to the existing hangars at the site for a concrete batching plant and the storage and manufacture of pre-cast concrete and building materials. The hangars themselves have been the subject of several planning permissions for various industrial and commercial uses.

- 2.26 In 1987, a building for the production of building blocks was granted planning permission by Arun District Council with subsequent variations/additions to the building up until 1998. In 2003, planning permission was granted for the continued use of the block factory building allowing for production on a 24-hour, 7 day a week basis.
- 2.27 The aerated block factory was the subject of a long period of production until 2010 when the works were closed and decommissioned.
- 2.28 In September 2013, Arun District Council determined three applications for Certificates of Lawfulness for a Proposed Use or Operation in relation to the two hangar buildings and the aerated block factory building. These certificates confirmed the established use of the buildings for general industrial activities.
- 2.29 More recently, the key permissions are
- WSCC/096/13/F – Proposed development and operation of a waste treatment facility (approved 09/01/15 subject to s106 agreement controlling hours, volumes and routing of HGVs).
 - WSCC/027/18/F – Proposed new access road and variation of existing S106 to vary permitted hours, volumes and routing of HGVs (approved 15/08/19).
- 2.30 These provide the permissions for the existing waste use at the site and for the approved (but not built) gasification plant, and for the new site access road that is now built and in use as the sole site access.
- 2.31 The associated s106 variation establishes that there can be 240 HGV movements a day (two way) via the new access.

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 The full description of development given on the planning application form is:

Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding, and landscape works.

3.2 The following provides a summary of the key elements of the proposals. A more extensive description is included in chapter 3 of the ES accompanying the planning application.

3.3 The proposed Ford ERF and WSTF will provide a high efficiency modern waste management facility with a combined annual capacity of 295,000 tonnes. The ERF (capacity 275,000 tonnes per annum) will process residual commercial and industrial (C&I) waste and municipal solid waste (MSW), mainly from West Sussex but also from the historic counties of Hampshire, Surrey, and East Sussex, including Portsmouth, Southampton, and Brighton and Hove. The WSTF (capacity 20,000 tonnes per annum) will process a range of plastics, metals, wood, paper / cardboard, inert construction waste, soils, and similar wastes from households and businesses in the same catchment.

3.4 The ERF is designed to meet R1 'recovery' status as set out in the Waste Framework Directive. This is a design standard that ensures that the ERF can be classed as a recovery facility in terms of the waste hierarchy that sets energy recovery as preferable to disposal of waste. The ERF is expected to generate approximately 31 MW of electrical power, of which approximately 28 MW will be exported to the local electrical distribution network (equivalent of powering approximately 68,250 homes over the lifetime of the plant) and the remainder will be used within the ERF. The ERF will also be able to export heat in the form of steam or hot water, and the applicants have identified potential heat customers, subject to final assessment and agreeing commercial terms (see the CHP-ready Assessment submitted with the application). Solar panels on the roofs of both buildings will generate up to 0.6MW of electricity that will contribute to the daily power needs on site.

3.5 The ERF will have a single stream (one waste bunker, one combustion chamber, one turbine, one stack) in a building located on the eastern half of the application site. The ERF building will also include education, administrative and welfare facilities.

3.6 The waste sorting and transfer facility (WSTF) will be located on the western half of the application site.

3.7 There will be other buildings and structures that are ancillary to the ERF and WSTF – these include: a gatehouse, five weighbridges, air cooled condensers, electricity transformer, pump houses, storage tanks (diesel, fire water), staff and visitor parking, and internal roads.

3.8 Drawing PL106 shows the site layout and the location of the various buildings and structures. Drawings PL310 to PL313 show the proposed site elevations. Individual building elevations and floorplans are also provided on other drawings.

- 3.9 The ERF building will be 176.5 m long and 134.2 m wide (including roof overhang), and has a raked roof profile with the highest point on the ridge above the boiler hall at 51.22 m above ground level. The 85m flue stack will be situated at the southern end of the building.
- 3.10 The WSTF building will be 150.1 m long and 64.5 m wide, (including roof overhang) with a raked roof profile to match the ERF design, and up to 19.67m in height relative to ground level.
- 3.11 The ERF, WSTF and other buildings / structures on site will be constructed using the same or similar palette of materials and colours (where appropriate) to provide a harmonised appearance.
- 3.12 An area in the centre of the site, situated between the internal access roads for the ERF and the WSTF will provide flexible space for the equipment and facilities that are needed during temporary shutdown periods, including portacabins for welfare facilities and offices, and storage of additional parts / equipment / tools. Outside of periods of shutdown, this area will be used for clean skip, bin and container storage associated with the WSTF.
- 3.13 Similarly, the small area of land to the north west of the main operational site will be used as an overflow storage area for clean skips, bins and containers associated with the operation of the WSTF, but during periods of ERF shutdown, this space will be available for the storage of parts and equipment associated with the ERF maintenance activities if necessary.
- 3.14 A detailed description of the design and materials for all buildings is provided in the Design and Access Statement. This document also provides illustrative views of the proposed buildings to assist in understanding what the buildings will look like when they are in place. Full details of all of the buildings are shown on the application drawings.
- 3.15 Drawing 2829-01-SK002 shows the proposed landscape planting along the boundaries of the site. This will help to screen the lower part of the buildings and the activity and circulation of vehicles on the site at ground level, as well as providing biodiversity resources. There will also be boards within the landscape spaces providing information on the local history of the site, in particular covering the Portsmouth and Arundel Canal that previously ran across the site and the important role of Ford Airfield in local aviation history.
- 3.16 An indicative surface water drainage strategy is provided in the Flood Risk Assessment (see ES Technical Appendix G). The proposed surface water network includes three below ground cellular storage tanks. Surface water will then flow through a light liquid separator and be discharged at greenfield runoff rates into the unnamed land drain to the east of the site, using an existing outfall.

The ERF building

- 3.17 The ERF building will house a single line of plant process equipment including:
- the waste reception system consisting of access ramp, waste reception hall and storage bunker
 - waste feed crane and grab, and furnace feed hopper

- grate, furnace / combustion chamber, auxiliary burners
 - boiler
 - flue gas treatment plant
 - a single 85 metre high flue stack
 - residue handling systems
 - a feed water treatment system
 - heat station
 - diesel generator
 - switchroom
 - control and monitoring systems
 - workshops
 - mechanical stores
 - office, welfare and education facilities.
- 3.18 The south facing slope of the roof will also be fitted with approximately 1100 m² of solar panels.
- 3.19 The heat station will, in the future, enclose plant that transfers heat generated by the combustion process off-site to heat users. The site layout has been designed to enable combined heat and power (CHP) pipework to be installed relatively easily beneath site roads once customers are identified.
- 3.20 The administration, welfare and education section of the ERF building will include (over five floors) a reception area, general office / meeting room space, welfare facilities and an education facility. The education facility will include a multi-functional meeting / seminar room with capacity for accommodating up to 50 people and exhibition space. The education facility will provide the opportunity to promote the importance of good waste management to the local community.
- 3.21 The air-cooled condensers, which return low-pressure steam from the turbine to water, will be situated to the south of the turbine hall outside the main ERF building. The condensers will cover a total area of about 800 m², situated on an elevated platform to allow air flow around them. The top of the condensers will be at 23.60m above ground level.
- 3.22 Further details of the process are provided in chapter 3 of the ES.

The WSTF building

- 3.23 The WSTF incorporates separate bays for the sorting and bulking of different waste types.
- 3.24 The different recyclable wastes recovered from each load will then be transferred into different bays using a front-end loading shovel or 360 grab excavator for bulking and onward transfer to a suitable offsite recycling facility for further treatment.
- 3.25 More specialised waste types, typically collected in smaller volumes (e.g. glass, metals, paper cups, textiles, rubber etc) will be stored at the southern end of the

WSTF, until sufficient volumes of these waste types have been collected for onward transfer.

- 3.26 The residual wastes (i.e. those items of waste that cannot be further re-used or recycled) will be bulked up and transferred to the adjacent ERF. It is anticipated that approximately one third of the waste processed at the WSTF will be transferred to the ERF as non-recyclable waste.
- 3.27 At the southern end of the WSTF a bay will be designated for unacceptable wastes to be quarantined, pending immediate onward transfer if required. A further quarantine area will be provided externally to the north of the WSTF to adequately isolate hot loads at risk of catching fire or already on fire.
- 3.28 There will also be a general storage room, vehicle workshop, and welfare and office facilities.

Gatehouse and weighbridges

- 3.29 There will be a single storey gatehouse at the entrance to the site, serving both the ERF and the WSTF. The gatehouse will be 16.6 m long, 3.2 m wide and 4.25 m high.
- 3.30 The ERF will have three weighbridges, two for incoming vehicles and one for exiting vehicles. All vehicles carrying ERF waste, residues or process materials will be required to weigh in and out of the facility.
- 3.31 Two weighbridges are proposed for the WSTF, one for incoming vehicles will be situated further along the internal circulation road, to the south of the WSTF staff and visitor parking area and the second, for exiting vehicles, will be located to the east of the WSTF building. As for the ERF, all WSTF related vehicles will be required to weigh in and out of the facility.
- 3.32 The layout of the site allows for bypassing all the weighbridges by staff and visitors.

Ancillary development

Parking

- 3.33 Parking for 71 cars, including four spaces for mobility impaired users, is provided to the east of the main ERF building, close to the entrance of the administration, welfare and education facilities. There will also be space for up to 2 minibuses or one coach to cater for parties of visitors attending the site. All visits will be by prior appointment. Thirty-two secure spaces for bicycles and up to seven motor cycle spaces will also be provided.
- 3.34 A further 62 car parking spaces, including three for mobility impaired users, will be provided to the south of the WSTF. Thirty-two secure spaces for bicycles will also be provided to the south of the WSTF offices.
- 3.35 Staff, visitor and maintenance contractor car parking spaces will be provided with electric charging points to encourage the uptake of electric vehicles.

- 3.36 To the west of the site, 10 parking bays are provided for articulated waste collection HGVs and 28 bays for smaller refuse collection vehicles. An additional five parking bays are provided next to the workshop for other HGV / RCVs. The waste fleet vehicles will be parked here overnight or when not in use. The vehicles will also be cleaned, maintained / serviced and re-fuelled on site.

Maintenance shutdown / 'outage' area

- 3.37 Both the ERF and WSTF buildings incorporate workshops, which will include a full complement of tools and spares required for the usual operation and maintenance of the ERF and WSTF. During periods of shutdown, the 'outage' area in the centre of the site, situated between the internal access roads, will provide flexible space for the equipment and facilities that are needed during these temporary periods, including a location for portacabins for welfare facilities and offices, and storage of additional parts / equipment / tools.

Electrical distribution

- 3.38 The ERF will export power to the grid under the conditions imposed by an export agreement established with the local network distribution operator (Scottish and Southern Electricity (SSE)) who will be responsible for connecting the ERF to the national grid. SSE will be responsible for obtaining any permissions or permits required to develop the necessary connection infrastructure.
- 3.39 SSE has indicated in correspondence that the connection is likely to be made to a sub-station at Crockerhill to the north west.
- 3.40 The ERF will connect to the SSE network through a step-up transformer situated to the south west of the main ERF building.

Telecommunications and data systems

- 3.41 The telecommunication systems to be provided at the site will comprise telephone connections, broadband internet connections, CCTV and signal cables for the fire alarm. The cables will run from the proposed development site, along the existing access road and then connect to the existing cable network in Ford Road.

Surface water

- 3.42 Given the location of the site within a high vulnerability zone of a principal aquifer and potentially high groundwater levels, sustainable urban drainage systems (SUDS) are not a practical option for dealing with surface water runoff. It is therefore proposed that surface water runoff is discharged into cellular storage tanks prior to discharging at greenfield runoff rates into a land drain to the east of the site.
- 3.43 The proposed attenuation system will provide 3,600 m³ of attenuation storage volume, which has been designed to contain the 1-in-30 year critical storm event, including 40% allowance for climate change without causing any flooding to the site.

- 3.44 A rainwater harvesting tank will also be installed to collect rainwater from building roof areas. This water will be used on site to support site activities / processes where appropriate.
- 3.45 Surface water from the existing access road will continue to be collected using a mixture of kerbed drainage, gullies, carrier pipes and drainage ditches. The surface water flows via petrol interceptors into the existing highway drainage network.
- 3.46 A more detailed description of the surface water drainage arrangements for the site and flood risk is included within the Flood Risk Assessment which is submitted as part of the application.

Foul water

- 3.47 Under normal operations there will not be any liquid process emissions from the ERF. In the event that excess process effluents are generated, such as during periods of maintenance, these will be collected and discharged to sewer in accordance with a trade effluent consent which will be secured from Southern Water.
- 3.48 Subject to formal approval from Southern Water, it is proposed to discharge all foul water from the proposed development, which will principally be from domestic sources, to Southern Water's wastewater treatment works to the south of the site.

Potable / mains water

- 3.49 The proposed ERF and WSTF will connect to existing pipes in Ford Road, via the existing access road. The incoming water supply will be separated into industrial water, fire-fighting water and potable water.
- 3.50 The ERF requires water for the steam cycle / boiler, the flue gas treatment plant and the incinerator bottom ash quench. Water for the boiler needs to be demineralised and so the facility will be equipped with a demineralised water treatment plant system.
- 3.51 Both the ERF and the WSTF will have fire water tanks.

Access and circulation

- 3.52 All vehicles will access the proposed ERF and WSTF from Ford Road, using the existing site access road. On site circulation is shown in figure 3.10 of the ES.

Security

- 3.53 A combination of boundary fence, flint wall, landscape bunds and an acoustic timber fence will provide perimeter security for the site. A 2.4 m high paladin fence will extend around the outer perimeter on its north, south and western boundaries. The northern half of the eastern boundary will be paladin fence and the southern half will be a flint wall.

- 3.54 Landscaped bunds and acoustic timber fencing within the outer security fence will also help to prevent unauthorised access to the facilities. Supervised CCTV will monitor the site entrance and boundary, and staff in the ERF gatehouse will monitor people and vehicles entering the site.

Lighting

- 3.55 The lighting design will provide safe working conditions in all areas of the development area, whilst minimising light pollution and the visual impact on the local environment. A mixture of wall mounted and column mounted luminaires will be used. The access road from Ford Road is already illuminated by column mounted luminaires. The luminaires used on site will not project light above the horizontal plane, and will be rated to minimise glare. Internal lighting will use passive infrared sensors to minimise light pollution from within the buildings.

The basic ERF process

- 3.56 Incoming waste will be delivered to the ERF in bulk transfer vehicles and weighed on arrival at the site before proceeding up a ramp to the elevated tipping hall.
- 3.57 Once the waste has been tipped into the waste bunker, the delivery vehicles will exit the ERF via the same ramp and have their weight recorded again at the exit weighbridge prior to leaving the site.
- 3.58 The storage capacity of the bunker will be equivalent to approximately five days of waste storage which provides flexibility around periods when there are no waste deliveries.
- 3.59 A crane grab will transfer the waste from the bunker into a feed hopper to feed the combustion chamber. The combustion chamber will use a reciprocating grate system to agitate the fuel bed and promote good burnout of the waste, ensuring a uniform heat release.
- 3.60 The combustion control system will regulate the combustion conditions, and thereby minimise the levels of pollutants and particulates in the flue gas before flue gas treatment (FGT).
- 3.61 Bottom ash is the burnt-out residue from the combustion process. The bottom ash will fall from the end of the grate into a water quench that cools the hot ash such that it does not represent a fire or dust risk. It is then transferred via a conveyor to a storage area. Ferrous metals and oversized items will be removed.
- 3.62 Further detail of the process is available in chapter 3 of the ES.

Energy recovery

- 3.63 The ERF will be equipped with a single steam turbine generator. Heat will be recovered from the flue gases by means of a water tube boiler integral with the furnace. The heat will be transferred through a series of heat exchangers. Superheated steam will then be supplied to a high efficiency turbine which, through a connecting shaft, will turn a generator to produce electricity.

- 3.64 Up to 10 MWth of heat from the ERF facility will be available for export to existing and potential local heat users. Depending on the requirements of any heat users, either high pressure steam or hot water could be supplied.

Flue gas treatment

- 3.65 Flue gases generated from the combustion process will be cleaned before being released into the atmosphere to the appropriate standards required to protect human health and the environment.
- 3.66 The residue from the cleaning processes, known as FGT residue, will be collected in fully enclosed hoppers and stored in a sealed silo.
- 3.67 Following cleaning, the treated flue gas will be discharged to atmosphere via the flue.

Residues and ashes

- 3.68 The process will result in two separate ash streams: IBA and FGT residues. IBA (bottom ash) is a recyclable non-hazardous waste. The IBA will be taken off site and used to make sustainable aggregates suitable for construction projects and road construction. 100% of the bottom ash from the proposed facility will be used for secondary aggregate production.
- 3.69 The FGT residue will be sent off site and used to create a lightweight, high quality, sustainable carbon-negative aggregate which is used to make building blocks as well as in other construction material products. The FGT residue will be removed from site in enclosed tankers.

Emissions monitoring

- 3.70 Emissions from the flue will be continuously monitored using a continuous emission monitoring system (CEMS) and reported in accordance with the Environment Agency's (EA) requirements for the operation of the facility.
- 3.71 In addition, periodic monitoring (at a frequency that will be agreed with the EA) will be undertaken of pollutants which are not able to be monitored continuously, such as metals and dioxins and furans.

Raw material handling and storage

- 3.72 In addition to the residual waste that will be tipped into the ERF bunker, the following raw materials will be required for ERF process operations:
- Dry lime - used to react with acid gases in the FGT process, will be stored in a silo / tank on site.
 - Powdered activated carbon (PAC) - used for the absorption of volatile heavy metals and organic components and will be added with the lime in the FGT process. The PAC will be stored in a silo and delivered via tanker.
 - Ammonia - used for the abatement of NOx in a NOx abatement system. Ammonia will be delivered in liquid form and stored in a tank on-site.

- Water treatment chemicals - used to treat water in the water treatment plant that provides feedwater to the boiler. The chemicals will be stored in a bunded area within the water treatment plant.
 - Fuel oil - used for the primary and auxiliary support burners, the diesel generator and mobile plant and equipment. The fuel oil will be stored in a bunded storage tank.
- 3.73 Various maintenance materials will be stored and used in small quantities.
- 3.74 All liquid chemicals stored on site will be kept in bunded controlled areas with a volume of 110% of stored capacity.

Operating hours

- 3.75 The ERF will operate 24 hours a day, seven days a week, except during periods of annual maintenance. The majority of deliveries and collections will be received / made between 06:00 and 20:00 hours Mondays to Fridays and 08:00 and 18:00 hours on Saturdays. However, some deliveries and / or collections will take place outside of these hours to take account of traffic conditions, to prevent the build-up of waste at the WSTF and following holiday periods or for other operational reasons.
- 3.76 The WSTF will also operate from 06:00 to 20:00 Mondays to Fridays, 08:00 to 18:00 on Saturdays. No waste processing will take place on Sundays.

Vehicle movements and trip distribution

- 3.77 The average daily operational HGV movements are forecast to be 109 each way (i.e. 218 HGV movements in total). Peak HGV movements are forecast to be 120 each way (i.e. 240 HGV movements in total).
- 3.78 It is anticipated that the trips associated with movement of waste to the site will follow a daily distribution with a peak in late morning and early afternoon, with minimal trips to site during the traditional peak hours on the main highway.
- 3.79 The ERF will operate 24 hours per day, with the shift changeover taking place outside of the peak traffic flow hours on the public highway. WSTF staff will work on a single shift basis, with start and finish times varying depending on the unique nature of each individual role. Overall staff traffic generation will be minimal.
- 3.80 Due to the nature of the facilities it is anticipated that most of the visitor trips will be made outside the conventional peak hours and amount to a few each month.
- 3.81 All vehicles will use the existing access road, Ford Road south and the A259. There is an existing s106 (deed of variation) dated 13 August 2019 that addresses the routing of HGVs to and from the site, in the context of the extant planning permission. This agreement also addresses limits on the number of HGVs leaving and entering the site and the hours within which they can do this; the recording of HGVs and reporting to WSCC; and the ability to request alternative routing by prior approval in some circumstances.
- 3.82 The applicants do not propose any changes to the agreed HGV movements or routing arrangements. The applicants are willing to enter into a new s106

agreement to secure the HGV routing, and consider that the number and timing of HGV movements can be addressed in planning conditions.

- 3.83 The draft heads of terms for the routing agreement are outlined in Appendix 3 to this document. Drafting of such an agreement will be addressed in the period after submission of the application and prior to a decision on it.

Education visits

- 3.84 Facilities will be available for visits by local interested parties during the normal day shift opening hours, by prior arrangement. Grundon and Viridor have a history of supporting education and research projects.

Maintenance

- 3.85 The ERF and WSTF will operate a detailed maintenance programme to ensure systems and equipment operate safely, effectively and reliably.

Abnormal operating conditions

- 3.86 The ERF will be designed to avoid the need for regular shutdowns but if any incident is likely to endanger personnel, or there is a risk of serious damage to the facilities, or a complete power failure, an emergency shutdown will be instigated.
- 3.87 The ERF and WSTF will be equipped with comprehensive fire protection and detection systems. An underground fire main will encircle both the ERF and WSTF. An above ground water tank will also be installed.

Odour and dust controls

- 3.88 The buildings and operational practices are designed to ensure that emissions of odour and dust are minimised. This includes use of negative pressure, odour control and dust suppression systems, processes enclosed within buildings, and door closures when there are no waste deliveries.
- 3.89 There will be a first in–first out approach for waste delivered to the WSTF and waste will not be allowed to deteriorate on site. Waste that cannot be re-used / recycled will not be stored on site, it will be sent directly to the ERF for treatment.
- 3.90 The site access road will be properly maintained and regular checks will be carried out on road conditions. Cleaning will be carried out as necessary. Vehicles will also be checked to ensure that they are clear of loose waste and that their loads are secure.

Noise controls

- 3.91 The majority of equipment with potential to create noise will be inside the buildings. Very high levels of acoustic insulation will be installed around the turbines and generator sets. Other potentially noisy equipment such as fans and motors will also be insulated. The air-cooled condensers (ACCs) are located to take advantage of the barrier effects of the buildings in relation to noise sensitive receptors located (or potentially located) to the north and west of the site.

- 3.92 On-site circulation has been designed to minimise the need for vehicles to reverse and use of reversing alarms.
- 3.93 Bunds and acoustic fences at the site boundaries will also help to reduce noise. Noise level checks will be carried out on a regular basis in operational areas where high noise levels may be present. Early warning of increasing noise levels will result in a noise reduction or mitigation programme.

Pest control

- 3.94 The bunker will be enclosed and under cover thereby reducing access to waste for birds and the tipping halls have been designed so as to eliminate roosting points for birds.
- 3.95 Routine cleaning and good housekeeping at both the ERF and the WSTF will reduce the potential for the facilities to provide an attractive environment for vermin. In the event that pests are identified, an action plan will be developed to eliminate or reduce the potential for nuisance to neighbours.
- 3.96 The ERF tipping hall and the WSTF tipping bays will be washed periodically and standard pest control methods will be implemented.

Litter controls

- 3.97 All vehicles carrying waste into or out of the ERF and WSTF will be covered. The delivery and storage of all waste within buildings on site further minimises the potential for wind-blown litter to occur.

Construction

ERF and WSTF construction programme and activities

- 3.98 The total site preparation and construction programme for the ERF and WSTF is expected to last for approximately 61 months.
- 3.99 The existing WTS operations are to continue uninterrupted for the duration of the construction and ERF commissioning programme, and all construction laydown and car parking requirements are to be accommodated on site. Construction activities will therefore proceed as follows:
- Phase 1 (10 months) – Demolition of the westernmost existing building, construction of the northern half of the WSTF and any feasible enabling works for the southern half of the WSTF
 - Phase 2 (3 months) - Demolition of the remaining existing buildings including the existing WTS
 - Phase 3 (36 months) - Construction and commissioning of the ERF
 - Phase 4 (12 months) - Construction of the southern half of the WSTF
- 3.100 The framework CEMP provided in technical appendix L of the ES sets out the high-level mitigation measures that will be applied during the site preparation and construction period to avoid adverse impacts on the receiving environment.

Work hours

- 3.101 Construction work audible outside the site boundary will take place during standard hours e.g. 07:00-19:00 hrs Monday-Saturday, with no work on Sundays or public holidays. Delivery of oversize plant and equipment, internal fit out, internal works and other non-intrusive works, may take place outside of these times. Extraordinary events such as concrete pours may also need to take place outside these hours, as by their nature they need to be continuous.

Construction employment

- 3.102 The number of people employed on site at any one time will vary across (and within) the construction phases.
- 3.103 During Phase 1 (months 1 – 10) it is expected that the workforce will range in number from eight to a peak of 35.
- 3.104 During Phase 2 (months 11 – 13) a constant workforce of 10 has been assumed for the demolition of the existing WTS.
- 3.105 It is expected that the construction workforce for Phase 3 (months 14 – 49) will peak at around 465 workers during month 35. Skilled labour will be supplied by the sub-contractors.
- 3.106 During Phase 4 (months 50 – 61) it is expected that the workforce will peak at 37 in month 57.

Site preparation and construction

- 3.107 All site preparation and construction related vehicles will use the existing access road, via Ford Road south and the A259.
- 3.108 Based on the peak construction workforce of 465 for Phase 3, it is estimated that there will be a peak of 620 two-way (i.e. 310 movements to site and 310 movements from the site) passenger vehicle movements per day (around month 35) to site (based on a vehicle occupancy of 1.5). Also based on typical requirements for bulk deliveries during construction of an ERF, a peak of 102 two-way HGV movements per day (around month 26) to site has been estimated.
- 3.109 The framework CEMP includes measures to manage, mitigate and monitor the main environmental effects of construction. It will be used to ensure that all works are carried out in a manner that safeguards the amenity of neighbouring residents and businesses and ensures the health and safety of site users and visitors.
- 3.110 Either the existing WTS or the proposed new WSTF will be operational throughout the construction period, generating on average 72 two-way HGV movements per day. At the peak during Phase 3 (construction of the ERF) there will be 102 two-way HGV movements per day. This means that during this short period there will be a total of 174 two-way HGV movements per day. It is important to note that for the majority of the construction period, the number of HGV movements will be much lower.

Construction equipment and laydown areas

- 3.111 A wide range of equipment will be required during the different construction phases, including: excavators, dump trucks, cranes, hoists, mobile elevating work platforms, forklift trucks, concrete pumps, piling rigs, compressors, generators and pumps.
- 3.112 The construction activities will require laydown areas for storage and limited pre-assembly of components. The location and size of laydown areas will vary throughout the programme.

Commissioning

- 3.113 Commissioning / testing of the ERF is likely to take approximately 18 months.
- 3.114 Commissioning will take place in two stages; 'cold' and 'hot' commissioning. Cold commissioning involves confirming that all items of plant and equipment function as intended. During hot commissioning the ERF will be operated with waste inputs to verify that the treatment technologies achieve the required aims.
- 3.115 At the end of hot commissioning the ERF will then undergo performance testing to verify that the facilities achieve their contractual performance requirements prior to independent certification. After this the ERF will be deemed ready for full service.

4.0 POLICY FRAMEWORK

Introduction

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of applications for planning permission should be made in accordance with the development plan, unless material considerations indicate otherwise. The main planning considerations for this application are therefore the policies of the adopted development plan together with the main other relevant material considerations, which are described in the following sections.

4.2 This chapter provides a summary and assessment of all policy frameworks, strategies and guidance that are deemed to be relevant to this application. The applicants have undertaken a thorough assessment of the main planning considerations, which include a review of the following:

- European directives and strategies
- National regulatory frameworks
- National planning, waste and energy policy frameworks and strategy
- The adopted development plan.
- National planning policy and other relevant policy and strategy.

4.3 The proposals have therefore been developed in the context of the following policy areas:

- Waste Management
- Planning
- Environment
- Energy

4.4 These policies, strategies and guidance apply at different levels, as follows:

- European
- United Kingdom
- West Sussex County
- Arun District
- Ford Neighbourhood

4.5 This section examines each policy level in turn, summarising the relevant policies concerning the issues listed and providing an assessment of the proposals to demonstrate compliance.

European directives and strategies

4.6 The UK is no longer a member state of the European Union (EU) but remains committed to directives already transposed into UK legislation. The UK will not be required to adopt any future amendments or new directives. The directives below are already active for the UK.

Waste Framework Directive (WFD)

- 4.7 The Waste Framework Directive (WFD) provides the legislative framework for the collection, transport, recovery and disposal of waste. Whilst European directives are not directly enforceable on UK businesses, they do establish an obligation on member states to implement national legislation. WFD 2008/98/EC sets out the basic concepts and definitions for waste management, including waste recycling and recovery.
- 4.8 These include the management of waste without endangering human health or causing harm to the environment, particularly with regard to risks to water, air, soil, plants or animals, without causing a nuisance through noise or odours and without affecting the countryside or places of special interest. The WFD requires that waste legislation and policy applies the principles established by the waste management hierarchy.

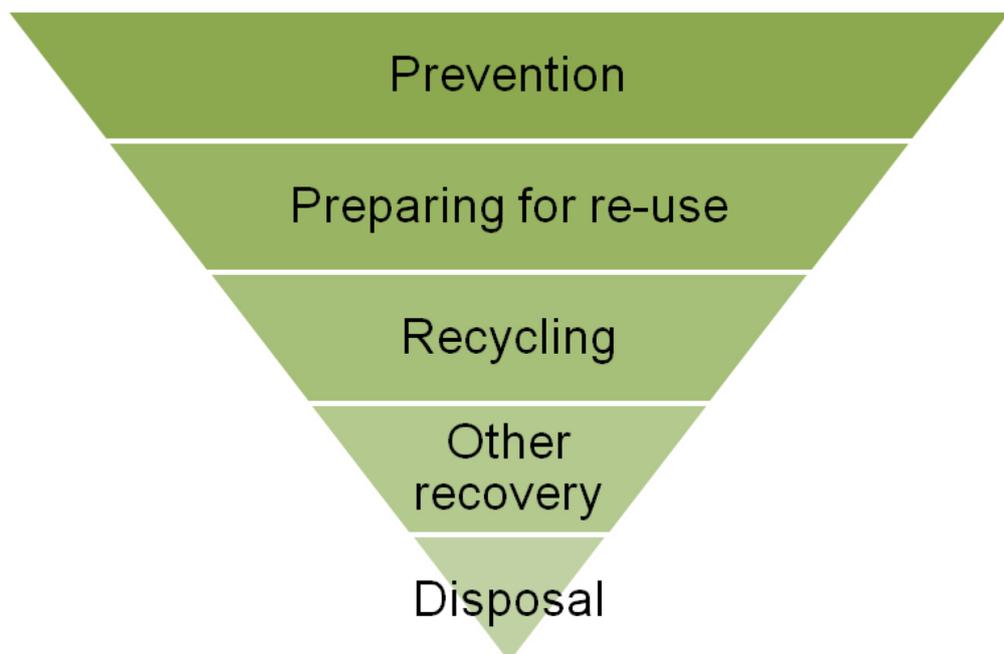


Figure 5.1: Waste hierarchy
NPPW (Appendix A)

- 4.9 The WFD has been subject to numerous amendments since 1975. Most recently Directive 2008/98/EC was amended by Directive 2018/851. In addition to existing targets, Directive 2018/851 sets out three new targets:
- By 2025, re-use and the recycling of municipal waste shall be increased to a minimum of 55% by weight
 - By 2030, re-use and the recycling of municipal waste shall be increased to a minimum of 60% by weight and
 - By 2035, re-use and the recycling of municipal waste shall be increased to a minimum of 65% by weight.
- 4.10 These targets should be viewed in the context of the existing recycling target of 50% by 2020 that the UK is working towards.

- 4.11 The WFD makes a distinction between low efficiency incineration technology (categorised as disposal) and high efficiency incineration (categorised as recovery). The criteria set out within the WFD apply an R1 calculation, with the threshold for achieving recovery status (R1) being 65% efficiency.

Compliance with the WFD

- 4.12 The proposed ERF will operate in full accordance with the WFD regulatory requirements with regard to protecting human health and the environment. It will make a valuable contribution towards managing waste further up the waste hierarchy and maximising the value of residual waste as a resource, by reducing the amount of waste disposed of to landfill and recovering energy and recyclable materials. It will operate to a high efficiency achieving R1 recovery status.
- 4.13 The WSTF also has an important role to play in achieving the objectives of the WFD in reducing the amount of waste going to landfill.
- 4.14 The CHP Ready Assessment submitted with the application includes the R1 calculation in Appendix E. The R1 efficiency is calculated as 0.83 without any heat export. With 3.56 MWth heat export to the identified heat users which is the average heat demand required by the identified heat users, the R1 efficiency is found to be 0.86. Both scenarios are above the threshold for new incineration plants (0.65). Therefore, the ERF will meet the definition of recovery with or without any heat export. The calculation is presented in the CHP Ready Assessment.
- 4.15 The proposed ERF and WSTF are therefore fully compliant with the provisions of the WFD (as amended).

The Landfill Directive

- 4.16 Under the waste hierarchy, landfill is considered to be the least sustainable option for waste management. The Landfill Directive 1999/31/EU was introduced in 1999 to reduce member states' reliance on landfill, thus reducing the effects of landfill on the environment and the risk to human health. As part of this the Landfill Directive set challenging targets for the reduction in biodegradable waste sent to landfill.
- 4.17 The targets for landfill reduction are based on the weight of waste that each member state landfilled in 1995. By 2016, the landfill of waste should be no more than 35% of the 1995 baseline figure. Intermediate targets of 75% in 2006 and 50% in 2009 are included in the Directive.
- 4.18 The Landfill Directive was transposed into national legislation through the Landfill (England and Wales) Regulations 2002, which were subsequently amended in 2004 and 2005.
- 4.19 In addition to waste recycling targets, and the separate collection of textiles and hazardous wastes, the EU's Circular Economy Plan (CEP) requires member states to ensure by 2030 that all waste suitable for recycling or recovery shall not be sent to landfill, unless this is the most environmentally suitable outcome. The Landfill Directive has been amended (2018/850) under the CEP which introduced a landfilling ban for separately collected waste and limits the share of municipal waste landfilled to 10% by 2035.

Compliance with the Landfill Directive

- 4.20 The ERF and WSTF will provide for the sustainable management of residual waste, which cannot practicably be reused or recycled, further up the waste hierarchy, ensuring that a significant volume of waste is not disposed of to landfill (the least sustainable option). They will assist the UK in continuing to reduce its reliance on landfill and contribute towards the directive's landfill reduction target of 10% by 2035.
- 4.21 As such the proposals are fully in accordance with the requirements of the Landfill Directive.

Industrial Emissions Directive (IED)

- 4.22 The IED 2010/75/EU is the main instrument for regulating emissions from industrial installations. It provides a high level of protection for human health and the environment as a whole by reducing harmful industrial emissions across all member states. The IED came into force on 6 January 2011 and was transposed into UK law under the 2010 Environmental Permitting Regulations (ERP) England and Wales (as amended).
- 4.23 The IED brought together seven directives simplifying existing legislation and increasing its efficiency. It incorporates the Integrated Pollution Prevention and Control (IPPC) Directive 2008/EC and replaced the Waste Incineration Directive (WID) 2000/76/EC.
- 4.24 The IED (Annex I) identifies a range of industrial activities, including waste management, that have the potential for pollution and which are required to operate under a permit system. Chapter IV makes special provisions for waste incineration plants and waste co-incineration plants and sets emission limits for specified pollutants. The IED permit approach is based on five fundamental pillars:
- An integrated approach
 - Application of best available techniques (BAT)
 - Flexibility
 - Inspections
 - Public participation.

Compliance with the IED

- 4.25 The proposed ERF has been designed to ensure compliance with the relevant regulations set out within the IED and the EPR, through the application of appropriate environmental controls, systems and monitoring to minimise emissions. In line with good practice, applications for Environmental Permits (EPs) for the ERF and WSTF, one for each facility, are being prepared and submitted in parallel with this planning application.
- 4.26 The ERF will fully comply with the IED (Chapter IV) and EPR requirements, ensuring that emissions are minimised and mitigated protecting the environment and human health.

Water Framework Directive (WaFD)

4.27 The WaFD 2000/60/EC provides a comprehensive approach to tackling existing water pollution and protecting water resources in the future. The WaFD came in to force on 22 December 2000, streamlining legislation by rationalising directives. Specifically, its objectives include:

- Protecting all forms of water (surface, ground, inland and transitional)
- Restoring the ecosystems in and around these bodies of water
- Reducing pollution in water bodies
- Guaranteeing sustainable water usage by individuals and businesses.

4.28 The WaFD was transposed into UK law through The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003, and subsequently revised in the 2017 regulations.

Compliance with the WaFD

4.29 The ERF and WSTF have been designed to include a range of measures, such as sustainable drainage systems (SuDS), that together will protect the water environment, during both the construction and operational phases of the development, and minimise the use of water throughout the process. The facilities will operate in full accordance within the provisions of the WaFD and Water Environment 2017 Regulations.

The Habitats Directive

4.30 The Habitats Directive 92/43/EEC (as amended) ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. The Habitats Directive sits alongside the Birds Directive 2009/147/EC.

4.31 Member states are required to designate sites as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) that together form the Natura 2000 network of protected ecological sites.

4.32 These directives were first transposed into UK law through the Conservation (Natural Habitats &c.) Regulations 1994. Following numerous amendments, this was replaced by the Habitats Regulations 2010, the principal means by which Directive 92/43/EEC on the conservation of natural habitats of wild fauna and flora (the Habitats Directive) is transposed for England and Wales. This also transposes elements of the EU Wild Birds Directive in England and Wales.

Compliance with the Habitats Directive

4.33 The project has been subject to a HRA screening process (see the screening document submitted with the application) which has concluded there will be no likely significant effects on interest features of the single European site in the vicinity, either alone, or in-combination with other plans and projects.

4.34 The proposals for the ERF and WSTF are therefore fully compliant with the Habitat Regulations requirements.

EU Directive on Environmental Impact Assessment (EIA)

- 4.35 The EIA Directive 85/337/EEC, which first came into force in 1985, requires the assessment of the effects of certain public and private projects on the environment. It has been subject to amendments, resulting in a codified version of the EIA Directive 2011/92/EU. This was further amended in 2014 by the EIA Directive 2014/52/EU, and transposed into UK law in May 2017, under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Compliance with EIA Directive

- 4.36 An EIA has been carried out and the findings are presented in an Environmental Statement (ES). The ES has been submitted with this planning application. It considers the potential environmental effects of the proposed ERF and WSTF and where appropriate sets out any measures deemed necessary to ensure that any identified residual effects are mitigated to a satisfactory level. The EIA and ES have been prepared with due regard to, and full compliance with, the EIA Directive and UK Regulations.

European Sustainable Development Strategy (ESDS)

- 4.37 The aim of the ESDS, first established in 2001, was to identify and develop actions to enable the EU to achieve a continuous long-term improvement of quality of life. This would be achieved through the creation of sustainable communities able to manage and use resources efficiently, tap the ecological and social innovation potential of the economy and ensure prosperity, environmental protection and social cohesion.
- 4.38 It set objectives and actions for key priority challenges for the period until 2010, many of which were predominantly environmental (including climate change and clean energy, sustainable transport, sustainable consumption and production, and conservation and management of natural resources). It is therefore relevant to the management of waste.
- 4.39 The 2006 ESDS review sets out a single, coherent strategy on how the EU would more effectively work towards its long-standing commitment to meet the challenges of sustainable development. Following a review in 2009 the ESDS provides a linkage to the Europe 2020 Strategy, which was adopted in 2010. This has laid the foundations for a more sustainable future built on smart, sustainable and inclusive growth.

Compliance with the ESDS

- 4.40 The ERF and WSTF are intended to ensure the continued sustainable management of residual waste, recovery of energy and reduction of landfill, all of which contribute towards the ESDS objectives. The plant has been specifically designed with sustainability and resource efficiency in mind, and to minimise the impact of waste management on the environment in accordance with the ESDS.

Thematic Strategy on Waste Prevention and Recycling

- 4.41 The EU published its Thematic Strategy on the prevention and recycling of waste in December 2005. This long-term strategy aimed to help Europe become a

recycling society that avoids waste and uses waste as a resource. It set out key actions deemed necessary to modernise the legal framework at that time and to promote waste prevention, reuse and recycling, with waste disposal only as last resort.

- 4.42 This was reviewed by means of a Report on the Thematic Strategy on Waste Prevention and Recycling (January 2011). Key messages were that the EU had made good progress towards becoming a resource-efficient 'recycling society' with improved recycling rates and reduced amounts of waste going to landfill, but that more needed to be done to address an increase in waste production and the associated demand on natural resources.

Compliance with the Thematic Strategy

- 4.43 The purpose of the ERF and WSTF is to secure the sustainable management of waste in accordance with the principle of moving practice further up the waste hierarchy, first by diverting residual waste away from landfill, secondly recovering energy and thirdly by recycling and re-using residual materials. The facilities will be part of a sub-regional waste management system, managing the residual waste that cannot practicably be re-used or recycled, following upstream operations intended to maximise recovery of recyclable materials.
- 4.44 The proposed facilities therefore accord with the sustainable waste management principles enshrined within Thematic Strategy on Waste Prevention and Recycling.

National legislation

Environmental Permitting Regulations (EPR)

- 4.45 The Environmental Permitting Regulations (England and Wales) 2010 were introduced to control certain activities which could harm the environment or human health or conservation sites. The 2010 regulations effectively combined the Pollution Prevention and Control (PPC) and Waste Management Licensing (WML) regulations.
- 4.46 The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 transpose the IED into UK law. The Environmental Permitting (England and Wales) Regulations 2016 consolidated the 2010 regulations, although these were further amended in 2018.
- 4.47 Under these regulations, and the underpinning IED, the proposed ERF and WSTF are required to obtain environmental permits (EP) and operate within the specified parameters.

Compliance with the EPR

- 4.48 Pre-application discussion has taken place with the Environment Agency in respect to obtaining EPs (one for the ERF and a separate EP for the WSTF). An application will be submitted in parallel to this planning application. This will provide the local planning authority with confidence that the facilities will operate within strict controls and not give rise to any unacceptable environmental effects in accordance with the EPR.

Waste (England and Wales) Regulations

- 4.49 The WFD has been transposed through the Waste (England and Wales) Regulations 2011 (as amended). These set out, inter alia, provisions in respect to waste prevention programmes, waste management plans, duties in relation to waste management, the use of waste as a resource and the duties of planning authorities.
- 4.50 Part 5 (paragraph 12) places a duty on an establishment that deals with waste to take all reasonable measures to apply the waste hierarchy. A departure may be made so as to achieve the best overall environmental outcome where it is justified by 'life-cycle thinking' on the overall impacts of the generation and management of the waste.
- 4.51 Paragraph 4 (Part 1 of Schedule 1) sets out the following requirements in relation to the key waste management principles of self-sufficiency and proximity:
- "a) To establish an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal waste collected from private households, including, where such collection also covers such waste from other producers, taking into account best available techniques.*
 - b) The network must be designed to enable the European Union as a whole to become self-sufficient in waste disposal and in the recovery of mixed municipal waste collected from private households, and to enable the United Kingdom to move towards that aim taking into account geographical circumstances or the need for specialised installations for certain types of waste.*
 - c) The network must enable waste to be disposed of and mixed municipal waste collected from private households to be recovered in one of the nearest appropriate installations, by means of the most appropriate technologies, in order to ensure a high level of protection for the environment and human health."*

Compliance with Waste (England and Wales) Regulations

- 4.52 The proposed ERF and WSTF will make a significant contribution towards the UK meeting the requirements of these regulations, as part of an integrated network of installations for the recovery of mixed municipal waste collected from private households, contributing towards the UK's self-sufficiency in respect to the recovery of mixed municipal wastes. Without the proposed ERF, the lack of alternative facilities would make it more likely that waste would need to be exported from the catchment or from the UK for treatment.
- 4.53 This is a significant material consideration in support of this planning application for the facilities.

Town and Country Planning (Environmental Impact Assessment) Regulations

- 4.54 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 transpose changes made to EU Directive 2011/92/EU under EU Directive 2014/52/EU into UK law and specifically relate to certain developments that are usually given planning permission through the town and country planning system.
- 4.55 They provide a high level of protection for the environment and help integrate environmental considerations into the preparation of proposals for development to reduce their impact on the environment. The 2014 amendments to the EIA Directive were made to simplify the rules for assessing the potential effects of projects on the environment, to lighten unnecessary administrative burdens; and to improve the level of environmental protection, with a view to making business decisions on public and private investments more sound, predictable and sustainable in the longer term.
- 4.56 The most significant changes made under the 2017 regulations relate to:
- The introduction of joint and/or co-ordinated procedures for projects which are subject to assessment under the EU Habitats, Birds and EIA Directives.
 - Amendments to the environmental factors to be considered with EIA with the term ‘human being’ has been replaced by the term ‘population and human health’; the term ‘fauna and flora’ has been replaced by ‘biodiversity’ and the addition of a new requirement to consider, where relevant, the effects on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters.
 - A new requirement for the ES to be prepared by competent experts and that the reviewing authority has or has access to sufficient expertise to examine the ES
 - Revisions to information provided on decision notices and during the decision making process
 - Where appropriate decisions to grant consent should include monitoring measures.
- 4.57 The 2011 Regulations (Schedule 4 Part 1 clause 4), required ESs to include:
- “A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from—*
- (a) the existence of the development;*
 - (b) the use of natural resources;*
 - (c) the emission of pollutants, the creation of nuisances and the elimination of waste.”*

Compliance with EIA Regulations

- 4.58 An EIA and its associated ES have been undertaken in full accordance with the provisions of the 2017 EIA regulations.

Water Resources Act (WRA)

- 4.59 The (WRA) 1991 is the legislation by which the UK regulates water resources, water quality and flood defence. Amended in 2009 it broadly covers two main areas of regulation in respect to:

- Permissions to abstract water from existing water resources
- Consents to discharge of material into controlled waters.

Compliance with the WRA

- 4.60 The proposed ERF and WSTF are designed to minimise their demand on water resources and avoid the need for discharge of water off-site, through the efficient recovery and re-use of water within the process. Where required, all appropriate consents will be obtained to ensure the ERF and WSTF will operate fully within the WRA regulations.

Habitat and Species Conservation Regulations and Acts

- 4.61 The Conservation of Habitats and Species Regulations 2017 consolidated the 2010 regulations (as amended). These transpose Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (the EC Habitats Directive) and elements of the Wild Birds Directive for England and Wales.
- 4.62 The regulations provide for the designation and protection of 'European sites', pursuant to the Habitats Directive, being Special Areas of Conservation (SAC) and Special Protection Areas (SPA).
- 4.63 The Ramsar Convention (1971) protects wetlands of international importance for birds. Whilst an international convention that sits outside of EU Directives, it is Government policy for Ramsar sites to be regarded as 'European sites' and thus afforded the same protection.
- 4.64 Internationally designated sites are also subject to the Section 28 of the Wildlife and Countryside Act (WCA) 1981, as amended by the Countryside and Rights of Way Act (CRoW) 2000. The CRoW Act and the Natural Environment and Rural Communities Act (NERC) 2006 together place a duty on decision makers to have regard to the conservation of biodiversity in England, when performing their normal functions.
- 4.65 Sites that are considered to be of national or local ecological importance, including Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Local Nature Reserves (LNR) are protected under a combination of the WCA 1981 (as amended) and the National Parks and Access to the Countryside Act 1949.
- 4.66 Protected species of animals and plants are those listed within Schedules 1, 5 and 8 of the WCA 1981 (as amended), with European protected species being

listed in Schedules 2 and 5 of the Conservation of Habitats and Species Regulations 2017. Protection is afforded by the Protection of Badgers Act 1992.

Compliance with Habitat and Species Conservation Regulations and Acts

- 4.67 The project has been subject to a HRA screening process (see the screening document submitted with the application) which has concluded there will be no likely significant effects on interest features of the single European site in the vicinity, either alone, or in-combination with other plans and projects.
- 4.68 The EIA has undertaken an assessment of habitats and protected and non-protected species present on the site. This has concluded that the proposed development with mitigation would not have an unacceptable impact on biodiversity interests.

Air Quality Standards Regulations 2010

- 4.69 The Air Quality Standards Regulations, which came in to force in June 2010, transposed in to UK legislation the requirements of Directive 2008/50/EC and 2004/107/EC relating to ambient air quality. Their objective is to improve air quality by reducing the impact of air pollution on human health and ecosystems. This is achieved by setting air quality standards for key pollutants and requiring air quality standard plans to be produced to demonstrate how air quality standards will be achieved and maintained.
- 4.70 The 2010 regulations were amended under the Air Quality Standards (Amendment) Regulations 2016 to capture changes made, under EU Directive 2015/1480/EC, to the technical standards regulating how air quality is monitored, to ensure that the methods used and data collected is more accurate and reliable.

Compliance with Air Quality Standards Regulations

- 4.71 The EIA has undertaken an assessment of the potential effects of the proposed development on air quality. This has concluded that will be no significant increase in the levels of traffic-related pollutants and no significant effects on air quality as a result of emissions, either at sensitive residential receptors or designated nature conservation sites.

Environmental Protection Act 1990

- 4.72 The Environmental Protection Act (EPA) 1990, makes provision for the improved control of pollution arising from certain industrial and other processes, which included waste management.
- 4.73 However, several of the Act's provisions relating to integrated pollution control and air pollution control (Part I), contaminated land (Part IIA), radioactive substances (Part V) and nature conservation (Part VII) have been replaced by more recent environmental legislation.
- 4.74 Relevant provisions of the Act, for this planning application, include Part II (waste on land) which imposes a duty of care on any business or person who produces, carries, keeps, treats, disposes of or imports controlled waste to do so safely, and Parts III and IV that make provisions addressing statutory nuisances and litter.

Compliance with the EPA

- 4.75 The proposed ERF and WSTF will be fully capable of meeting all EPA requirements.

National planning policies, strategies and guidance

- 4.76 This section provides an overview of these policy frameworks, highlighting parts that are considered to be most relevant to the proposed ERF and WSTF. The relevant national planning policy documents, strategies and guidance are:

- National Planning Policy Framework, 2019
- National Waste Management Plan for England, 2014
- National Planning Policy for Waste, 2014
- Our Waste, Our Resources: A Strategy for England, 2018
- Energy from Waste – A Guide to the Debate (DEFRA) February 2013
- Revised Overarching National Policy statement for Energy (EN-1) July 2011
- National Policy Statement for Renewable Energy Infrastructure (EN-3) July 2011.

National Planning Policy Framework 2019

- 4.77 The revised National Planning Policy Framework (NPPF) was published in 2019, replacing the 2012 and 2018 NPPFs. The revised NPPF sets out the overarching national policy framework for achieving sustainable development, providing guidance for both plan-making and decision-making and addressing specific topic areas.

- 4.78 Whilst the revised NPPF does not provide any specific policy guidance on waste, it does cover a number of other wider planning policy matters, which are relevant to the proposed development.

- 4.79 These include:

- Achieving sustainable development
- Building a strong, competitive economy
- Promoting healthy and safe communities
- Promoting sustainable transport
- Achieving well designed places
- Meeting the challenges of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment.

- 4.80 Each of these are considered in turn below.

Achieving sustainable development

- 4.81 The NPPF¹ states that the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF² sets out the three overarching objectives to achieve sustainable development. These are:
- a) *An economic objective - to help build a strong, responsive and competitive economy*
 - b) *A social objective - to support strong, vibrant and healthy communities*
 - c) *An environmental objective - to contribute to protecting and enhancing our natural, built and historic environment*
- 4.82 The NPPF³ carries a presumption in favour of sustainable development, which is defined in paragraph 11. This advocates that decision making should apply a presumption in favour of sustainable development. For decision making this means approving development that accords with an up to date development plan, or where there are no relevant development plan policies, or the policies are out of date, unless there are policies within the framework which provide a clear reason for refusing permission, or the adverse impacts of granting permission would demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 4.83 The proposed ERF and WTSF are inherently sustainable, designed to perform an important role within the waste hierarchy and the UK's network of sustainable waste management facilities. They will manage residual waste that would otherwise go to landfill (the least sustainable option) thus reducing the amount of waste landfilled and maximising the value of waste by recovering energy from waste that cannot practicably be re-used or recycled.
- 4.84 The revised NPPF⁴ requires all decisions on proposed development to be approached in a positive and creative way, and for local planning authorities to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. All decision-makers should seek to approve applications for sustainable development where possible.
- 4.85 The NPPF⁵ encourages early engagement to improve the efficiency and effectiveness of the planning system, leading to better coordination between public and private resources and improved outcomes for the community. Applicants are encouraged to proactively engage with the local planning authority, local community and statutory and non-statutory consultees at an early stage. Greater benefits can be achieved by resolving issues at the pre-application stage enabling decisions to be made in a timely manner, reducing the scope for unnecessary delays and costs.
- 4.86 The applicants have participated in a pre-application consultation with West Sussex County Council (WSCC), Arun District Council, and Ford, Yapton and

¹ NPPF paragraph 7

² NPPF paragraph 8

³ NPPF paragraph 10

⁴ NPPF paragraph 38

⁵ NPPF paragraphs 39 to 41

Climping parish councils. It has engaged with stakeholders including the local community through newsletters and a project website providing information about the proposals. A public exhibition was planned but was cancelled due to government requirements about social distancing during the covid-19 pandemic, but the exhibition material was made available on the website. Further details of the pre-application consultation and community engagement undertaken, and the feedback received, is provided in chapter 6 of this document and in the Statement of Community Involvement (SCI), submitted as part of the application.

- 4.87 The scope of information required by WSCC and other stakeholders, has been addressed through the pre-application process. An Environmental Statement (ES), explaining the results of the EIA, has been submitted with the application.
- 4.88 This approach has ensured that the local planning authority and other technical bodies have been consulted upon the proposed scope and methodology of the EIA, and that this was agreed at an early stage in the process. This accords with NPPF policy, in demonstrating that the right information has been provided, and reducing the scope for decision-making to be unduly delayed by requests for additional information.

Building a strong competitive economy

- 4.89 The government expects the planning system to support sustainable economic growth. The NPPF⁶ requires significant weight to be placed on the supporting economic growth and productivity, in decision making, and account to be taken of the local business needs and wider opportunities for development.
- 4.90 The proposed ERF and WSTF will make an important contribution towards the local, regional and national economies. They will support local jobs and recover recyclable materials that are reprocessed and fed back into the economy as well as provide recovery of energy. The facilities will contribute to economic growth through the provision of employment and opportunities to supply goods and services.
- 4.91 The construction workforce will vary in size depending on phase of construction and specific activities within phases. Based on projects elsewhere of a similar size, it is expected that the construction workforce will rise to a peak at around 465 workers in the peak month (month 35), then dropping away thereafter. Further details are provided in chapter 3 of the ES.
- 4.92 Skilled labour will be supplied by sub-contractors. There will be opportunities for local workers to be employed.
- 4.93 The ERF will employ a total of 40 staff, mostly in a shift pattern. The WSTF will also employ a total of 40 staff. The existing WTS has 24 staff and there will therefore be an additional 56 employees at the site.
- 4.94 There will also be additional jobs supported by the proposals off-site, for example in head or regional offices.

⁶ NPPF paragraph 80

4.95 In addition, there will potential for apprenticeships and training, to which all three of the applicants are committed.

4.96 The proposals therefore contribute to NPPF economic objectives, which should be afforded weight and supported.

Promoting healthy and safe communities

4.97 Government policy⁷ requires policies and decisions to help achieve healthy, inclusive and safe places, whilst also facilitating the provision of local services to enhance the sustainability of communities and residential environments.

4.98 The proposed ERF and WSTF will be an important part of the local, regional and national waste management system, serving the needs of local communities and managing waste in a sustainable way, minimising the environmental impacts associated with the landfill of residual waste.

Promoting sustainable transport

4.99 Transport should be considered at an early stage in development proposals, so that the impact of development on transport networks can be addressed and opportunities to exploit existing and proposed transport infrastructure can be explored. Opportunities to promote walking, cycling and public transport should also be promoted.

4.100 National policy⁸ requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken account of, together with appropriate opportunities for avoiding and mitigating any adverse effects, and for achieving net environmental gains.

4.101 The proposals at Ford will use a recently constructed access road and junction, and will not require any further transport infrastructure off site. All of the car parking spaces will be provided with electric vehicle charging capability, and there will be ample cycle parking at both the ERF and the WSTF. The proposal will operate within the current limit of 240 HGV movements (two-way) per day. The findings of the Environmental Statement (ES) are that there will be no significant traffic and transport effects arising from the proposed development.

4.102 The proposed facilities are in accordance with NPPF guidance on transport and movement and this is considered in more detail in the Transport Assessment and the ES.

Achieving well designed places

4.103 The NPPF⁹ is clear that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. It states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

⁷ NPPF paragraphs 91, 92 and 95

⁸ NPPF paragraph 102

⁹ NPPF paragraph 124

- 4.104 The guidance¹⁰ also requires planning decisions to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 4.105 More generally, the NPPF¹¹ requires that when determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 4.106 The design approach taken by the applicants is visually attractive, comprising high quality architecture and using good quality materials, and whilst the buildings are large in scale the design respects local character.
- 4.107 The proposals fully accord with NPPF guidance on design and in delivering outstanding and innovative design. As such significant weight should be attributed to this in determining this application.

Meeting the challenges of climate change, flooding and coastal change

- 4.108 The NPPF¹² requires the planning system to support the transition to a low carbon future in a changing climate, including renewable and low carbon energy and associated infrastructure. When determining planning applications for renewable and low carbon development, it also states¹³ that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and should approve the application if its impacts are (or can be made) acceptable.
- 4.109 The thrust of the NPPF guidance is to promote, foster and encourage rather than restrict renewable energy and low carbon energy development. The proposed ERF will provide a form of low carbon energy. By recovering energy from waste that would otherwise go to landfill (which produces landfill gas, a greenhouse gas) the ERF will contribute towards the generation of decentralised renewable energy in accordance with the objectives of the NPPF.
- 4.110 The NPPF directs new development away from those areas at highest risk of flooding. The proposed site is predominantly located in flood zone 1, the lowest risk area. The proposed drainage strategy makes allowance for climate change. The application is in accordance with NPPF guidance.

Conserving and enhancing the natural environment

- 4.111 The NPPF¹⁴ establishes that the planning system should contribute to and enhance the natural and local environment.
- 4.112 The landscape and visual effects of the proposals have been fully assessed within the Landscape and Visual Impact Assessment (LVIA) forming part of the EIA. This concludes that there will be significant effects on some landscape character areas

¹⁰ NPPF paragraph 127 (parts a and b)

¹¹ NPPF paragraph 131

¹² NPPF paragraph 148

¹³ NPPF paragraph 153

¹⁴ NPPF paragraph 170

and some views, but this must be seen in the context of the allocation of the site for the use proposed, and the benefits it will bring in terms of sustainable waste management and generation of low carbon energy, amongst other matters.

- 4.113 The proposed development gives the opportunity to increase and enhance the tree cover through the proposed landscaping scheme.
- 4.114 In respect to habitats and biodiversity, the NPPF¹⁵ requires local planning authorities to apply the following principles when determining planning applications.
- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused
 - Development on land within or outside a Site of Special Scientific Interest (SSSI), and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSI
 - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists
 - Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 4.115 The site is not subject to any European, national or local ecological designations, nor does it include any significant habitats or large populations of protected species. The ES finds that none of the expected effects on ecological receptors on or off site are significant.
- 4.116 In addition, the proposed development is calculated to have significant positive impact on the biodiversity value of the site compared to baseline levels. As such the proposal accords with the NPPF.
- 4.117 In respect to ground conditions and pollution, the NPPF states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination¹⁶. Adequate site investigation is required to enable an assessment to be made and appropriate remediation undertaken.

¹⁵ NPPF paragraph 175

¹⁶ NPPF paragraph 178

- 4.118 The ES submitted with the application identifies appropriate remediation proposals and finds that no significant residual risks are predicted in association with ground conditions.
- 4.119 The NPPF requires that planning decisions¹⁷ should ensure that new development is appropriate for its location, taking account of the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site, or the wider area to impacts that could arise from the development. In doing so they should:
- Mitigate, and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life
 - Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 4.120 On air quality matters, the NPPF¹⁸ requires planning decisions to have regard to sustaining and complying with relevant limit values or national objectives for pollutants, taking account of the presence of Air Quality Management Areas (AQMA), Clean Air Zones, and the cumulative impacts from individual sites in the local area.
- 4.121 The NPPF¹⁹ is clear that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.
- 4.122 All relevant aspects related to land contamination and stability, potential pollution to land, water and air (including noise and light), and impact on natural heritage have been comprehensively assessed in detail within the EIA and are found to accord with the NPPF.

Conserving and enhancing the historic environment

- 4.123 The NPPF²⁰ considers heritage assets an irreplaceable resource, to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.124 There are no designated archaeology assets or scheduled monuments on the site. However, there are such features nearby, and the site is partly within an Archaeological Notification Area, so there is also potential for discovery of archaeological deposits during construction.

¹⁷ NPPF paragraph 180

¹⁸ NPPF paragraph 181

¹⁹ NPPF paragraph 183

²⁰ NPPF paragraph 184

- 4.125 An assessment of the impact on nearby heritage assets has been undertaken in accordance with NPPF guidance. The ES shows that, following completion of the construction works and completion of mitigation measures, there will be some significant effects on the setting of two nearby listed buildings. However, this must be weighed against the benefits of the proposals in securing sustainable waste management and low carbon energy generation.

Conclusions on compliance with the NPPF

- 4.126 It has been demonstrated above, and through the ES and other supporting documents that the proposal for the ERF and WSTF is sustainable development and is compliant with the NPPF when read as a whole. This is a significant material consideration that should be afforded weight in support of the proposals.

Waste

National Waste Management Plan for England 2013

- 4.127 The Waste Management Plan for England (WMPE), fulfils an obligation under Article 28 of the revised WFD (2008/98/EC) for competent authorities to establish waste management plans that cover all of their territory. The plan provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised WFD.
- 4.128 The WMPE notes that there are comprehensive waste management policies in place in England that deliver upon the revised WFD objective which is:
- “to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use”.*
- 4.129 As such, the WMPE does not introduce new waste management policies, but rather its aim is to bring current waste management policies under the umbrella of one national plan. This includes reference to the waste hierarchy, of which other recovery forms an important part in diverting waste from landfill. It confirms that:
- “The Government, supports efficient energy recovery from residual waste – of materials which cannot be reused or recycled - to deliver environmental benefits, reduce carbon impact and provide economic opportunities.”*
- 4.130 The government places importance on ensuring that the right waste management infrastructure is in place, at the right time, and in the right location. Appropriate waste reprocessing and treatment infrastructure should be constructed and operated effectively at all levels of the waste hierarchy to enable the most efficient treatment of our waste and resources.
- 4.131 The WMPE also reflects the 'proximity principle', enshrined within the WFD. This requires a network of waste management facilities to be established to enable waste to be disposed of, or be recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

Compliance with WMPE

4.132 The proposed ERF and WSTF fully accords with the objectives of the WMPE.

National Planning Policy for Waste (NPPW) 2014

4.133 This provides national planning policy for waste to be read in conjunction with the NPPF 2019 and Waste Management Plan for England (WMPE) 2013.

4.134 It provides detailed waste policies building upon the WMPE framework, which sets out the government's ambition to work towards a more sustainable and efficient approach to resource use and management. It states²¹ that positive planning plays a pivotal role in delivering this country's waste ambitions, the most relevant in the case of this application being:

- Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy
- Provision of a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle
- Helping secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.

4.135 The NPPW²² provides specific guidance for the determination of waste planning applications. Waste planning authorities should *inter alia*:

- Only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date local plan.
- Consider the likely impact on the local environment and on amenity against the criteria set out in appendix B of the NPPW and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies
- Ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located
- Concern themselves with implementing the planning strategy in the local plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.

Compliance with the NPPW

4.136 The proposals provide sustainable, modern and efficient waste management infrastructure, that enables waste from households and businesses to be recovered in proximity to where it arises, in accordance with the proximity

²¹ NPPW paragraph 1

²² NPPW paragraph 7

principle, without endangering human health and without harming the environment.

- 4.137 The proposals support NPPW policy, including helping to push the management of waste further up the waste hierarchy and ensuring that waste is dealt with at the nearest appropriate installation (the proximity principle).
- 4.138 The site is allocated for strategic waste uses in the adopted development plan, and is located close to other waste management facilities. There are no overriding physical or environmental constraints to development. It is also well located to the strategic road network, which already accommodates waste movements.
- 4.139 The ES and supporting material consider the cumulative impact of the proposed facilities. Whilst some adverse effects will occur, when balanced with strong policy support and the benefits of the proposals it can be concluded that the facilities as proposed would be acceptable.
- 4.140 Given that the site is allocated in the development plan for the use, the NPPW says there is no requirement to demonstrate market need.
- 4.141 The buildings are of a high quality and innovative architectural design that responds to the character of the area. The proposed design fully meets the NPPW design guidance.
- 4.142 Overall, in respect to planning for sustainable waste management the proposal is fully compliant with the NPPW.

Our Waste, Our Resources: A Strategy for England (2018)

- 4.143 This is the first update of national waste strategy since the 2011 Waste Review. Linked to the government's 25-year Environmental Plan, which pledges to leave the environment in a better condition for the next generation, it aims to move the UK to a more circular economy, essentially by keeping resources in use for longer and extracting maximum value. It focuses on particular waste problems such as single use plastics, confusion over recycling systems and a reduction in packaging waste.
- 4.144 The strategy is framed by natural capital thinking and guided by two overarching objectives:
- To maximise the value of resource use; and
 - To minimise waste and its impact on the environment.
- 4.145 The strategy is supported by five strategic principles, the most relevant to this application being *'to prevent waste from occurring in the first place, and manage it better when it does'*. It will contribute to five strategic ambitions. These are:
- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025
 - To work towards eliminating food waste to landfill by 2030
 - To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan

- To double resource productivity by 2050 and
 - To eliminate avoidable waste of all kinds by 2050.
- 4.146 It highlights²³ that the UK continues to rely on landfill, with 12 million tonnes of municipal waste sent to landfill in 2016. This is a major concern and the strategy aims to eliminate biodegradable waste to landfill. Importantly, it recognises that growth in energy from waste and alternative waste treatment infrastructure will be expected to divert further waste from landfill.
- 4.147 In addition to improving recycling rates and reducing greenhouse gas emissions from the landfill of biodegradable waste, the strategy seeks to drive greater efficiency of EfW plants with only eight existing plants operating in CHP mode.
- 4.148 The strategy confirms that the government will work with industry to secure a substantial increase in the number of energy from waste plants that are formally recognised as achieving recovery status, and will ensure that all future EfW plants achieve recovery status (R1 status).
- 4.149 The strategy indicates that on current waste projections, further market investment in residual waste treatment infrastructure is welcomed. It states:
- “We particularly encourage developments that increase plant efficiency, minimise environmental impacts whilst upholding our existing high standards of emissions control, and progress technologies that produce outputs beyond electricity generation where these are demonstrated to be environmentally sound and economically viable”.*
- 4.150 The proposed ERF and WSTF will have a valuable role within the waste hierarchy, reducing the amount of waste disposed of to landfill and recovering energy in a sustainable way. They will help to maximise the value of residual waste as a resource and minimise its impact on the environment.
- 4.151 The plant will be CHP enabled, but even without CHP delivery will operate to a high efficiency, having achieved the R1 recovery status (see the submitted CHP Ready Assessment report for further information).
- 4.152 The CHP Ready Assessment report identifies the opportunity to establish CHP links to potential local heat users, including HMP Ford and Rudford Industrial Estate.
- 4.153 The ERF and WSTF will contribute towards meeting the 2018 waste strategy objectives of driving up the efficiency of energy from waste and recovering greater value from residual waste. The application is entirely consistent with the 2018 waste strategy for England.

Energy from Waste – A Guide to the Debate (DEFRA) February 2013

- 4.154 DEFRA’s guide on energy from waste was first published in 2013 and updated in 2014 to include an additional chapter setting out the future direction for energy from waste. Although predating the recent 2018 waste strategy for England, it provides a helpful starting point for discussions about the role energy from waste might have in managing waste, highlighting issues for discussion, available options and the process

²³ Page 20

for decision making. The overview to the document summarises the key messages, with the remainder considering technical issues in more depth.

- 4.155 The DEFRA guide is focused on the thermal treatment of mixed residual waste. This is the waste that is left over when all recycling possible has been undertaken and when it is considered that the environmental or economic costs of further separating and cleaning the waste are greater than any potential benefit of doing so.
- 4.156 Given that residual waste comprises various materials, the guide clarifies that only the energy generated from the recently grown materials (biodegradable) in the mixture is considered to be renewable. Energy from residual waste is therefore a partially renewable energy source, sometimes referred to as a low carbon energy source.
- 4.157 The guide re-affirms the use of the waste hierarchy and the role of energy from waste within it. It notes that when comparing energy recovery with landfill, the most important factor is their potential contribution to climate change. It highlights two simple rules:
- The more efficient the plant is at turning waste into usable energy the better
 - The proportion of the waste that is considered renewable is key – higher renewable (biodegradable) content makes energy from waste inherently better than landfill.
- 4.158 It concludes that:
- “Energy from waste is therefore better than landfill, providing the residual waste being used has the right renewable content and is matched with a plant that is efficient enough at turning the waste to energy. These considerations should be at the heart of any proposal”.*
- 4.159 The guide states that energy from waste can co-exist with high recycling and low landfilling, provided sufficient flexibility is provided in contracts, plants and processes to adapt to potential long-term changes in waste arisings and composition and continue to drive waste management further up the hierarchy. It concludes that energy from waste need not necessarily compete with recycling.
- 4.160 Energy from waste is recognised as not just being about waste management but also an energy source, highlighting that:
- The energy it produces is a valuable domestic energy source contributing to energy security
 - As a partially renewable energy source it can also contribute to our renewable energy targets which are aimed at decarbonising energy generation
 - It has the added advantage that it is non-intermittent, so it can complement other renewable energy sources such as wind or solar.
- 4.161 The guide recognises that most EfW plants currently only generate electricity, but that more are looking to use the heat generated through CHP. It recognises that in making effective use of heat, it is possible to deliver higher efficiency and deliver upon the government’s objective to capture more energy from less waste.
- 4.162 The ERF and WSTF proposed at Ford will deliver the benefits of energy recovery and landfill diversion, and will be capable of delivering efficient waste management

and energy recovery, with the ERF securing R1 status, whilst also having future potential to serve adjacent and nearby areas with heat.

- 4.163 The proposals will drive waste up the waste hierarchy, by reducing landfill disposal, and include (at the WSTF) a recycling component; overall the proposals will complement rather than compete with re-use and recycling.
- 4.164 The applicants will rely on source segregation of waste or segregation currently being undertaken at other waste management facilities.
- 4.165 Waste to be received at the WSTF will either be pre-sorted at source or will be subject to manual sorting and segregation upon arrival in preparation for bulking and onward transfer to appropriate waste management facilities. All non-recyclable waste leftover after sorting within the WSTF will be transferred to the ERF.
- 4.166 The facilities will also recover residual metals for onward reprocessing and re-use, whilst the bottom ash and flue gas treatment (FGT) residues will both be recovered through conversion to secondary aggregate materials and building construction materials (e.g. concrete blocks).
- 4.167 The guide importantly states in respect to emissions and public health impact that:

“The emissions clean-up step ensures that all the waste gases emitted from the plant meet the very tight limits placed on them by EU legislation. As a result, energy from waste plants contribute only a small fraction of both local and national particulate and other emissions.”

And

“The potential health implications of emissions are often a major focus of concern, hence the tight regulation of the emissions and the high priority Government gives to the ongoing process of conducting, evaluating and disseminating high quality science. Public Health England (PHE) has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. It notes that modern, well-managed incinerators make only a small contribution to local concentrations of air pollutants. The PHE’s view is that while it is possible that such small additions could have an impact on health, such effects, if they exist, are likely to be very small and not detectable”.

- 4.168 The proposed facilities will meet all statutory standards relating to emission and public health. The ES and other supporting documents (including a Health Impact Assessment and Health Risk Assessment), together demonstrate that the proposals would have no significant effects on air quality and/or human health.
- 4.169 The guide requires that regard be had to the proximity principle, which requires all waste for disposal and mixed municipal waste (i.e. waste from households) to be recovered in one of the nearest appropriate facilities. It does accept that this principle should not be over-interpreted, stating that it does not require using the absolute closest facility to the exclusion of all other considerations. This is deemed to ensure that existing capacity is used effectively and efficiently, and

importantly helps maintain local flexibility to increase recycling without resulting in local overcapacity.

4.170 The proposals provide an ERF and WSTF in proximity to several sources of waste arisings in West Sussex and adjacent areas. The proposals are entirely consistent with the proximity principle and should be afforded substantial weight in decision making.

4.171 With respect to planning applications, the guide states that:

“Early engagement with the community by developers before submitting a planning application is firmly advocated. Developers need to be responsive to the concerns of the community and many of the issues identified in this guide could be raised; developers should be ready and able to address them. In turn, communities should recognise and be realistic about development constraints such as those around location and costs”.

4.172 The applicants have undertaken consultation with the waste planning authority, statutory and non-statutory stakeholders, local interest groups and the local community. Comments received from this have been given consideration with a summary of the engagement undertaken and the response to issues raised being presented in the Statement of Community Involvement (SCI), submitted as part of this application.

4.173 Energy from waste facilities must obtain an environmental permit (EP) to operate. The proposed ERF and WSTF will operate within the remit of separate EPs for each facility. In order to provide certainty on environmental matters, EP applications have been submitted to the Environment Agency alongside the planning process.

Overall compliance with DEFRA energy from waste guidance

4.174 As discussed above, the applicants have considered the DEFRA guidance, and have demonstrated through this application that the proposals are consistent with the approach advocated in so far as they would enable the sustainable treatment of mixed residual waste supporting the diversion from landfill. Furthermore, given its ability to secure R1 recovery status and future potential for CHP the ERF will be highly efficient in delivering low carbon energy from residual waste that cannot be recycled.

Energy White Paper May 2007

4.175 The government’s Energy White Paper (EWP), sets out the challenge of tackling climate change through reductions in greenhouse gas emissions and increased low carbon energy, whilst securing future supply.

4.176 The EWP²⁴ confirms the government’s support for distributed energy and supports CHP, including the recovery of energy from waste. Paragraph 5.3.44 states that:

²⁴ EWP paragraph 3.17

“Generating energy from that portion of waste that cannot be prevented, reused or recycled has both energy and waste policy benefits. Energy generated either directly from waste or through the use of a refuse derived fuel has benefits for security of supply. In addition, the biodegradable fraction of waste is a renewable resource.”

- 4.177 The proposed ERF will ensure that low carbon energy is recovered from the treatment of residual waste that cannot practicably be prevented, reused or recycled, also contributing to reductions in greenhouse gas emissions (through diversion of waste from landfill) and UK energy security.

Revised Overarching National Policy Statement for Energy (EN-1)

- 4.178 This National Policy Statement for Energy (EN-1) sets out national policy for energy infrastructure that falls within the remit of the Infrastructure Planning Commission (IPC). However, paragraph 1.2.1 indicates that EN-1 is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, EN-1 is a material consideration is a matter that should be judged on a case by case basis.
- 4.179 EN-1²⁵ states that future large-scale renewable energy generation is likely to come from various sources, including energy from waste. It confirms that the principal purpose of the combustion of waste, is to reduce the amount of waste going to landfill in accordance with the waste hierarchy and to recover energy from that waste as electricity or heat. It adds that only waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill should be used for energy recovery. Also, energy produced from the biomass fraction of waste is renewable.
- 4.180 Part 4 of EN-1 sets out the general principles that should be applied in the assessment of development consent order (DCO) applications (although as noted above it is also relevant to non-DCO developments across the range of energy technologies).
- 4.181 It highlights the potential for CHP derived from EfW, whereby waste heat is used to drive electricity generation and steam/lower grade heat is supplied to customers via heat networks. It recognises that this approach can reduce the amount of fuel otherwise needed to generate the same amount of heat and power separately. Using less fuel to generate the same amount of heat and power reduces emissions, particularly CO₂²⁶.
- 4.182 Part 5 sets out policy for the assessment of impacts which are common across a range of technologies (generic impacts), including energy from waste.
- 4.183 The proposed ERF accords with Part 4 of EN-1 by facilitating the continued generation of low carbon energy from residual waste, the reduction of greenhouse gas emissions associated with disposal of waste to landfill, and introducing the potential future opportunity to use CHP. The ES and supporting technical documents, submitted with this application, address the matters covered in Part

²⁵ EN-1 paragraph 3.4.3

²⁶ EN-1 paragraph 4.6.3

5, and conclude that identified impacts are avoided or mitigated to an acceptable level. EN-1 therefore provides national energy policy support for the planning application.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 4.184 Whilst EN-1 provides a primary basis for decision making on nationally significant infrastructure project applications, the National Policy Statement for Renewable Energy Infrastructure (EN-3) provides specific guidance in respect to energy from waste. It confirms that electricity generation from renewable sources of energy is an important element in the government's development of a low-carbon economy. EN-3 can be a material consideration in decision making on relevant applications made under the Town Country Planning Act 1990 (as amended).
- 4.185 EN-3 guidance also confirms that the recovery of energy from the combustion of waste, where in accordance with the waste hierarchy, will play an increasingly important role in meeting the UK's energy needs. Where the waste burned is deemed renewable, this can also contribute to meeting the UK's renewable energy targets. Further, the recovery of energy from the combustion of waste forms an important element of waste management strategies in both England and Wales.
- 4.186 Part 2 provides assessment and technology specific information, covering aspects such as:
- Climate change adaptation - should be resilient to risk of flooding
 - Good design for energy infrastructure - should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology
 - Factors influencing site selection - these include proximity to grid connection, existing transport routes and opportunities for multi-modal transport where possible, potential for CHP, national designation, green belt and previously developed land.
 - Energy from waste impacts in respect to landscape and visual, noise and vibration, odour and vermin, waste management, residue management, and water quality and resources.
- 4.187 The application site is not subject to significant flood risk, whilst the proposed design (as detailed in the Design and Access Statement) is of high quality and takes account of landscape and visual, noise and ecological aspects, such that EN-3 is complied with.
- 4.188 EN-3²⁷ gives recognition to the need for energy from waste facilities to connect to a transmission network. The technical feasibility of this is dependent upon the capacity of the grid network to accept electrical output. The proposed ERF will have access to a suitable grid connection as identified in the ES; this ensures that this requirement can be met, as advised by EN-3.
- 4.189 EN-3 requires that new energy from waste facilities should be located in the vicinity of existing transport routes. It accepts that although there may, in some

²⁷ EN-3 paragraph 2.5.22

instances, be environmental advantages to the use of rail or water transport, the viability of this likely to be determined by the economics of the scheme. It also states that applications should incorporate suitable access leading off from the main highway network and if new infrastructure is proposed the effects of this should be considered.

- 4.190 The application site has a recently constructed new access road that provides access to the strategic road network. The proposals will not require any changes to this access arrangement. This accords with EN-3 guidance.
- 4.191 The proposed ERF will be CHP enabled and will achieve R1 recovery status. The proposals can therefore fully meet the EN-3²⁸ guidance regarding CHP.
- 4.192 The application site is not located within any nationally designated areas, (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), nor does it significantly affect the historic environment to an unacceptable degree, and therefore accords with EN-3²⁹ guidance.
- 4.193 All potential impacts have been considered through the EIA, and reported in the ES submitted with the application. This concludes that the majority of the potential impacts can be mitigated and that the few residual effects are acceptable.

Overall compliance with EN-1 and EN-3 guidance

- 4.194 Whilst related to energy from waste projects that are considered under DCO procedures, the EN-1 and EN-3 guidance can be a material consideration for energy from waste projects determined through the Town and Country Planning Act. The proposal is deemed to follow EN-1 and EN-3 national energy planning policy.

The development plan

- 4.195 Under the provisions of the Planning and Compulsory Purchase Act (PCPA) (2004) the current development plan comprises the following:
- West Sussex Waste Local Plan (2014)
 - West Sussex Joint Minerals Local Plan (2018)
 - Arun District Local Plan 2011-2031 (2018)
 - Ford Neighbourhood Development Plan (2019)
- 4.196 The key development plan policies of relevance to the proposed development are set out below. Please note that no policies of the West Sussex Joint Minerals Local Plan are considered relevant to the application so, whilst part of the current development plan, there are no further references to this document.

²⁸ EN-3 paragraph 2.5.26 and 2.5.27

²⁹ EN-3 paragraphs 2.5.33 and 2.5.34

West Sussex Waste Local Plan (April 2014)

- 4.197 The most relevant policies are those of the West Sussex Waste Local Plan (WLP). The WLP was prepared to be consistent with the National Planning Policy Framework (NPPF) and covers the period to 2031. It was reviewed by WSCC in 2019 and this review concluded that the WLP remains relevant and effective.
- 4.198 The WLP is consistent with national policy in the NPPF and also with the National Planning Policy for Waste (NPPW). Its strategic objectives include working towards zero net waste to landfill by 2031 and maintaining net self-sufficiency in managing the transfer, recycling and treatment of waste. It identifies a shortfall in recovery capacity of 270,000 tonnes per annum and allocates sites to meet this. These sites are considered to be acceptable in principle for waste development subject to consideration of detailed matters when planning applications are made.
- 4.199 The WLP is also in line with national policy in recognising that it is for the market to determine the most appropriate combination of facilities and technologies to come forward to meet need; it is not prescriptive of any particular type of facility or technology.

W10: Strategic Waste Allocations

- 4.200 Of particular significance is policy W10 – Strategic Waste Allocations. This identifies five sites to address the shortfall in transfer, recycling and recovery capacity.
- 4.201 The application site is one of these, referred to as "site north of Wastewater Treatment Works, Ford" and shown in the WLP on Policy Map 1.

Need and the sources of waste to be managed

- A2.1 Paragraph 6.2.8 of the WLP, in line with the NPPW, says that there will be no requirement for applicants to demonstrate a quantitative or market need for a proposal on a site allocated in Policy W10; this is because they have been allocated to meet identified shortfalls in waste management capacity to deliver the objective of net self-sufficiency. However, the following is relevant regarding the allocated site and the availability of waste arisings.
- 4.202 The policy and legislative context clearly supports the need for the WSTF and ERF. The proposals will deliver key objectives of national policy and strategy, as well as meeting needs identified in the WLP. They will assist with delivering the waste hierarchy, and will contribute to self-sufficiency (in terms of both energy recovery and sustainable waste management). They will recover value from residual waste.
- 4.203 The WSTF and ERF will use an allocated strategic waste site to help West Sussex to meet its objectives of maintaining net self-sufficiency in managing the transfer, recycling and treatment of waste generated in the county; to have network of facilities to minimise transportation of waste; and working towards zero net waste to landfill by 2031.
- 4.204 The ERF also contributes to the national need to provide energy infrastructure to assist in meeting energy demand and to contribute to security of supply. The ERF

will generate about 31 MW of electricity and export about 28 MW of this to the grid. It will also generate heat that can be exported to potential offsite heat customers once such are identified and secured, and there is a heat plan submitted with the application that identifies the potential for this. The energy produced by the ERF is low carbon, and there will be solar photovoltaics panels on both the WSTF and the ERF buildings, so the proposals therefore also contribute to national commitments to increase energy generation from renewable and low carbon sources.

- 4.205 Para 7.3.8 of the WLP says that in theory the allocated site has the physical capacity to deliver a single built facility (up to c.250, 000tpa) or a number of smaller facilities; however, the actual waste management capacity achieved on the site would depend upon the specific type of facility/facilities and the chosen technology or technologies.
- 4.206 The application provides for two facilities, an ERF and a WSTF that together provide 295,000 tpa of capacity. Whilst this is greater than the c.250,000 tpa stated, it is noted that the figure stated is approximate and that it is acknowledged in the WLP that capacity will depend on the specific proposals. The implication from the WLP is that the allocation is not limiting capacity at the site to 250 000 tpa and hence provision in excess of 250,000 tpa is potentially acceptable. Importantly the proposals will be able to operate within 240 HGV movements in and out each day, as currently allowed by the extant s106 agreement.
- 4.207 The capacity of the WSTF (about 20,000 tpa) is similar to the current operations at the existing WTS at the site (normally 20,000 to 25,000 tpa) and will serve a similar market. The main difference is that the existing WTS simply bulks waste imports and sends them on for further treatment or disposal at other facilities. The proposed WSTF will sort the imported waste to remove recyclables for onward transfer, with the residual component sent to the new ERF on site.
- 4.208 The Ford ERF has been designed to treat up to 275,000 tonnes of residual waste material per year. The ERF will operate as a merchant waste management facility, meaning that it will be funded and constructed on the basis of securing waste from a range of sources under commercial arrangements within the competitive waste market.
- 4.209 The ERF will secure waste arisings (C&I and MSW) from within a reasonable catchment area by road that will include West Sussex and neighbouring historic counties. The prohibitive costs associated with transporting waste by road over long distance mean that imports from further afield are unlikely to be economic.
- 4.210 Both the self-sufficiency and proximity principles are enshrined in Article 16 of the Waste Framework Directive (WFD) and are implemented in UK law by the Waste (England and Wales) Regulations 2011. The self-sufficiency principle requires that most waste should be treated or disposed of within the region that it is produced.
- 4.211 The proximity principle, which forms a core principle within the Waste Management Plan for England (WMPE) means that waste should be recovered or disposed of, as close as possible to where it is produced. This means at one of the nearest facilities with available capacity, rather than at the absolute closest, which may or may not have such capacity. Currently much of West Sussex's residual waste is exported out of the county for disposal in landfill, for recovery in

Energy Recovery Facilities or as Refuse Derived Fuel (RDF) to continental Europe for energy recovery.

- 4.212 The most recent available Annual Monitoring Report produced by West Sussex County as the Waste Planning Authority covers the period 2017/18 (AMR2017/18). It identifies a shortfall in recovery capacity of 5,000 tpa after considering the 2015 permission at Ford (140,000 tpa for the RWTF gasification element).
- 4.213 However, the Inspector reporting on the recent planning appeal for an ERF at the former Wealden Brickworks at Horsham (ref: APP/P3800/W/18/3218965), agreed that an Anaerobic Digestion (AD) facility (125,000 tpa) had been wrongly included in the AMR2017/18 figures so that the recovery shortfall was actually 130,000 tpa, after considering the 2015 permission at Ford, rather than the 5,000 tpa figure identified in the monitoring report.
- 4.214 It was also highlighted at the appeal that RDF is currently being exported from the County to continental Europe for energy recovery, and that tonnage of RDF is also not included within the West Sussex's figures. This was claimed by the appellant to be up to 155,000 tpa of additional waste.
- 4.215 It is clear from these figures that West Sussex has a significant identified shortfall of operational recovery capacity. Whilst the recent approval of a new ERF on appeal at the former Wealden Brickworks, Horsham has the potential to provide additional capacity, similarly to the fallback position for the approved MRF and gasification plant at Ford (reference: WSCC/096/13/F), that capacity is only potential capacity. There is a significant difference between securing permission for capacity and delivering operational capacity on the ground.
- 4.216 In addition to processing waste from West Sussex, some waste inputs to the application site at Ford would also be brought to the site from the adjoining historic counties (to include Portsmouth, Southampton, and Brighton and Hove). This would be in line with the need for regional self-sufficiency and the proximity principle to allow waste to be treated at one of the nearest available facilities. The amounts involved and the precise origins of the waste will naturally depend on future contracts and available capacity.
- 4.217 It is notable that the Inspector at the Horsham appeal gave substantial weight to the benefits of meeting an identified need. In general terms the identified need can be defined as a clear national need for waste management infrastructure and energy generation capacity, the need to move from disposal to higher levels of the waste hierarchy (e.g. recovery) and meeting the objective of net zero waste to landfill, the need to address the identified local shortfall in recovery capacity, and the need to have a network of facilities to help meet regional self-sufficiency and the proximity principle. The Horsham appeal is further discussed in Appendix 1 of this document.
- 4.218 The proposal for the ERF at Ford will avoid nonrecyclable wastes being disposed to landfill; recover renewable/low carbon energy; have potential to provide heat to nearby businesses and other premises; and recover secondary materials including aggregates and metal.

- 4.219 Substantial weight applies to the benefit of meeting an identified need at the ERF and WSTF proposals at the Ford site, which is a site allocated for such facilities in an up to date waste local plan.

Development principles

- 4.220 Part c) of the policy states that proposals at the sites must accord with the policies of the WLP and also satisfactorily address development principles for each site as set out in supporting text.
- 4.221 How the proposals in this planning application address these development principles for the Ford site is an important consideration and is explained in chapter 5 of this document.

Safeguarding

- 4.222 Part d) of the policy says that the allocated sites will be safeguarded from any development either on or adjoining the sites that would prevent or prejudice their development (in whole or in part) for the allocated waste management use or uses.
- 4.223 It is noted that Policy W2 also seeks to safeguard existing waste management sites, including in the context of proposals for new development on neighbouring land that may prejudice their continuing efficient operation.
- 4.224 W10 (d) and W2 are relevant in the context of a strategic housing proposal at Ford (allocated in the Arun Local Plan and subject of a live outline planning application at the time of writing) and its relationship with the proposed (and existing) waste management activities at the application site, both of which are safeguarded by these policies. This WLP strategic policy context supports the idea that the new homes at Ford should be located an appropriate distance from the waste site boundary, and the new housing proposals should mitigate for potential effects on new residents as a result of their location in proximity to the strategic waste site. This is a consideration in the assessment of how the application interacts with the housing proposals. This matter is addressed in Appendix 2 of this document in considering pre-application advice that this interrelationship should be explained.

Other relevant policies of the Waste Local Plan

- 4.225 Other relevant WLP policies and how the proposals address them are explained below.

W11: Character

- 4.226 Policy W11(a) states that proposals for waste development will be permitted provided that they would not have an unacceptable impact on the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas.
- 4.227 The site is located within WSCC's landscape character area SC9 - Chichester to Yapton Coastal Plain. It is part of an existing area of industrial development that is an acknowledged part of the character of the Ford area. Given this context, the

proposed development will fit into this existing character. It is also pertinent that the site is surrounded by a large strategic housing allocation in the Arun Local Plan, that will also affect the local character. The site and the surrounding housing area will become a single large built up area, as recognized in the Arun Local Plan that identifies the proposed built up area boundary.

- 4.228 The design of the proposals is a key area of built-in mitigation in this respect. It takes cues from the local area and the aviation heritage of the site. A lower level 'plinth' on the ERF relates to the scale of the hanger buildings that previously occupied the site, and the upper interlocking 'wings' offer a strikingly confident architectural form which assists in breaking up the overall size of the building, but at the same time reflect the dynamism of flight and refers back to the site's aviation heritage. The inclined rooflines help bring the ERF building to ground at its northern and southern extents, and the simplicity of the shape of both of the buildings takes a cue from large aircraft hangers.
- 4.229 The careful selection of materials and colour helps to blend the buildings visually into their context. Local character has been incorporated within the design with the use of large areas for flint walling which will add visual texture to the eastern elevation of the ERF and the WSTF admin/workshop building.
- 4.230 The layout also reflects the position of the former Portsmouth and Arundel Canal where it crosses the site. A gap is provided in the perimeter bunding to the west to mark the former alignment of the canal. A water feature is provided on the eastern edge of the site that is also on the alignment. Further information on how the layout and design reflects the site's heritage is provided in the Design and Access Statement.
- 4.231 The form and colour of the buildings sets them apart from the other industrial buildings in the surrounding area and it embraces the principles of current WSCC and CABE/Design Council design guidance for waste related infrastructure projects.
- 4.232 The proposals include new planting around all sides of the site, providing habitat, low-level screening and reinforcement of landscape structure in the area, linking to adjacent landscape where this is present. This reflects, and will help to reinforce, the character of the area. No important features or characteristics of the area will be lost.
- 4.233 A landscape and visual assessment has been undertaken. The conclusions are that there will be significant effects on some landscape character areas and some views, which is inevitable given the large scale of the buildings and the height of the flue stack, but this must be seen in the context of the allocation of the site for the use proposed, and the benefits it will bring in terms of sustainable waste management and generation of low carbon energy, amongst other matters.
- 4.234 In this context, whilst the ERF and WSTF will be larger than the existing buildings at the site, their impact on character, distinctiveness and sense of place will not be unacceptable. Part (a) of policy W11 is therefore met.
- 4.235 Policy W11(b) also seeks to protect the separate identity of settlements and the distinctive character of towns and villages, avoiding development that would lead to their actual or perceived coalescence.

4.236 The Arun Local Plan allocation that surrounds the site will effectively create a new settlement with a built-up area boundary that includes the site. The proposals themselves are on a free-standing existing waste management site and do not extend beyond the existing boundary, and will not themselves cause any actual or perceived coalescence, so part (b) of W11 is also met.

W12 – High Quality Development

- 4.237 Policy W12 states that proposals for waste development will be permitted provided that they are of high quality. Part (a) seeks integration with and, where possible, enhancement of adjoining land-uses, and to minimise potential conflicts between land-uses and activities.
- 4.238 The design of the ERF and WSTF is of high quality. The buildings are designed by an architect with a long track record of high-quality design of buildings of this type, and takes account of relevant national and local design guidance. This is explained further in the DAS. In addition, the process design contained within the buildings is state of the art for these types of facilities.
- 4.239 The immediately adjoining land uses are currently farmland and open-air recreation, with other industrial and waste uses in close proximity and inter-visible with the site. The proposals will integrate well with this context. The site is self-contained and has an access shared with other waste and industrial uses, and this helps to minimise potential conflicts between existing land-use and activities.
- 4.240 In the context of the Arun Local Plan strategic housing allocation that surrounds the site, it is clear that the nearby land uses will change to include more housing, employment and related uses. The existence of the allocation itself, made in full knowledge of both the existing waste site, its strategic waste allocation, and extant permission for an increase of activity, including thermal treatment, at the site, implies that there is recognition that buildings of this type can be integrated with the proposed new residential area.
- 4.241 The site is self-contained and has an access shared with other waste and industrial uses, and this helps to minimise potential conflicts between existing and proposed land-use and activities.
- 4.242 It is also pertinent that the site and its waste management use pre-date the emergence of the strategic housing allocation, and the proposals for the latter must therefore show that they will not prejudice the operation of waste management at the site and will integrate with it. This is a requirement of National Planning Policy for Waste, the West Sussex WLP, and the Arun Local Plan
- 4.243 The applicants for this application believe that this integration can be achieved and have taken account of the future advent of new housing development in the design and layout of the ERF and WSTF proposals.
- 4.244 Part (b) of the policy requires that proposals should have regard to the local context including:
- the varied traditions and character of the different parts of West Sussex;
 - the characteristics of the site in terms of topography, and natural and man-made features;

- the topography, landscape, townscape, streetscape and skyline of the surrounding area;
 - views into and out of the site; and
 - the use of materials and building styles.
- 4.245 All of these matters have been considered in the design of the proposals, as described in the DAS and the landscape and visual impact assessment. For example, the locally characteristic use of knapped flint walls is included in the materials palette, and there are reflections of the former aviation history at the site, and the former presence of the Portsmouth and Arundel Canal crossing the site, in the design and layout. A wide range and number of views have been included in the landscape and visual impact assessment.
- 4.246 Part (c) requires that development considers measures to maximise water efficiency. This has been addressed in the proposals. Rainwater will be collected and used on site to support site activities / processes where appropriate. Process water will be recycled. The water use in the administration and welfare elements will follow latest building regulations standards for low flow taps and showers, and low flush toilets.
- 4.247 Part (d) requires that there should be measures to minimise greenhouse gas emissions, to minimise the use of non-renewable energy, and to maximise the use of lower-carbon energy generation (including heat recovery and the recovery of energy from gas).
- 4.248 The proposals include an ERF that will generate electricity, and has potential to supply heat, recovered from a renewable/low carbon source. A greenhouse gas assessment has been carried out and is reported in the ES. This concludes that the development will have a significant positive effect on carbon and greenhouse gas emissions, compared to landfilling of the waste.
- 4.249 Part (e) requires that there should be measures to ensure resilience and enable adaptation to a changing climate. The proposed drainage strategy incorporates appropriate measures to manage surface water drainage in accordance with current practice that provides for a 1 in 100-year risk event with allowance for future climate change. This is reported in the ES and the Flood Risk Assessment.
- 4.250 Overall the requirements of policy W12 are therefore met.

W13 – Protected Landscapes

- 4.251 This policy mainly concerns development within protected landscapes, which do not occur at the site. However, part (b) allows for waste development located outside protected landscapes to be permitted provided that they do not undermine the objectives of the designation, and therefore requires consideration.
- 4.252 The nearest protected landscape to the site is the South Downs National Park, the boundary of which is about 2.25 km to the north of the site, at its closest point. The purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

- 4.253 A landscape and visual assessment has been undertaken. This concludes that the ERF and its flue stack and periodically, the visible plume, will appear as a new distant landmark structure in a setting that includes significant development, including other distant large-scale structures such as high-rise buildings at Littlehampton and Bognor Regis and a large gas holder at Littlehampton.
- 4.254 The conclusions are that there will be effects on views from some higher ground in the National Park, which is inevitable given the large scale of the buildings and the height of the flue stack. However, this must be seen in the context of the allocation of the site for the use proposed, and the benefits it will bring in terms of sustainable waste management and generation of low carbon energy, amongst other matters.
- 4.255 The proposals will not therefore undermine the objectives of the national park designation. The impacts will therefore not be unacceptable.
- 4.256 The site is some distance from the AONBs at Chichester Harbour and the High Weald, and is not likely to be visible from either and will not therefore undermine the objectives of their designation, that are related to conserving and enhancing natural beauty.

W14 – Biodiversity and Geodiversity

- 4.257 Parts (a) to (c) of this policy seek to protect areas or sites of international biodiversity importance, avoid adverse impacts on areas or sites of national biodiversity or geological conservation importance and areas, sites or features of regional or local biodiversity or geological conservation importance.
- 4.258 There are no such sites, areas or features on the application site, although there are such in the vicinity. Biodiversity and natural heritage issues have been addressed in the ES and in the shadow Habitat Regulations Assessment submitted with the application. These conclude that there will be no adverse impacts on the identified protected areas and sites.
- 4.259 Part (e) seeks, where appropriate, the creation, enhancement, and management of habitats, ecological networks, and ecosystem services. The site currently has limited on site biodiversity resources. The proposals for the ERF and WSTF include new planting around the site boundaries that includes new native planting to create habitats that will be attractive to a range of species. The proposed habitat mitigation planting scheme for the site, will result in the creation of an additional 0.508 ha of habitat compared to baseline levels. Furthermore, the habitats created will be of higher biodiversity value than the existing habitats.
- 4.260 There will be a 600% net gain in the biodiversity value of habitats at the site post-development and a 200% net gain in the biodiversity value of the hedgerow units post development. These figures do not consider non-habitat creation measures such as proposed bird, bat and bug boxes. Therefore, the proposed development is calculated to have significant positive impact on the biodiversity value of the site compared to baseline levels.
- 4.261 The proposal is therefore in accordance with policy W14.

W15 – Historic Environment

- 4.262 This policy seeks the conservation of, and the avoidance of adverse effects upon, known and unknown heritage assets.
- 4.263 Regarding the proposals, impacts on cultural heritage have been assessed and reported in the ES. Mitigation includes a programme of archeological investigation and preservation by record. There will be some adverse effects on the setting of some designated heritage assets in the area, however this is inevitable given the size of the ERF building and the height of the flue stack. However this must be seen in the context of the allocation of the site for the use proposed, and the benefits it will bring in terms of sustainable waste management and generation of low carbon energy, amongst other matters. The impacts will therefore not be unacceptable.
- 4.264 In addition, while the site itself does not have a rich resource of non-designated assets, it does possess elements that attest to its former use in two distinct periods of transport history. This heritage will be celebrated and its awareness increased as follows.
- 4.265 The historic route of the Ford to Hunston section of the Portsmouth - Arundel canal is represented in the design of the proposals with a break present in both the eastern and western screening / security landforms and a water feature near the administration wing of the ERF.
- 4.266 Other measures include:
- The western facing flint wall will incorporate the historic seal of the Portsmouth - Arundel canal along with a recessed interpretation panel about the canal
 - The reception area will have educational displays – some of which will reflect the aviation history of the site between 1917 - 1959 along with audio visual presentations
 - The water feature proposed on the eastern site boundary will have a basic heritage interpretation board equipped with a QR code that allows further information and visualisations about the development and the history of the site to be explored
 - Opportunities will be explored with local schools or the local history groups to get them involved in a local community art installation and design project.
- 4.267 Taken together these enhancement and heritage interpretation measures will result in a moderate beneficial effect.
- 4.268 Overall, the effects on the historic environment will not be unacceptable and the requirements of policy W15 will be met.

W16 – Air, Soil, and Water

- 4.269 This policy seeks to prevent unacceptable impacts on air, soil and water resources.
- 4.270 The proposals at Ford will have little impact on soil resources as the site is entirely covered by hard standing.

- 4.271 Impacts on air and water resources are addressed in the ES and the conclusions are that there will be no adverse effects on ground conditions, groundwater and surface water quality, or air quality, arising from the development.
- 4.272 There will therefore be no unacceptable impacts, as sought by this policy. See chapter 5 later in this document for a summary of the ES findings, or the ES and the relevant technical appendices for a detailed report on these matters.

W17 – Flooding

- 4.273 This policy seeks to avoid any increase in flooding. Flood risk is addressed in the ES and the accompanying Flood Risk Assessment. The proposals are not in a location at risk of flooding, and the site drainage proposals provide an appropriate means to ensure that surface water run-off is properly managed. No significant effects on flood risk are predicted as a result of the proposed development and the built development will not be at risk from flooding.

W18 – Transport

- 4.274 Part (a) of this policy seeks that, where practicable and viable, rail or water transport should be made use of.
- 4.275 With regard to the proposals, the site is identified in the WLP policy W10 as a strategic waste management site and is not adjacent to any rail or water transport infrastructure. The accompanying site-specific principles in the WLP do not require or advise the investigation of rail or water transport at the site.
- 4.276 It is considered that in this instance the use of rail or water transport is not practicable or viable.
- 4.277 In accordance with part (b) of the policy, and given its status as a strategic site in the WLP, the transport links to the site are deemed to be adequate to serve the development.
- 4.278 Part (c) addresses details of routing, capacity, safety and site circulation and management that are addressed in the ES in the description of the proposals and the traffic and transport chapter, and also in the Transport Assessment. The conclusion is that no significant residual traffic and transport effects are predicted as a result of the proposed development. The traffic routing will adhere to that agreed in the s106 legal agreement attached to the existing planning permission for the site access road. In consideration against the requirements of Policy W18 (c), the proposals are not unacceptable and will not have adverse impacts.

W19 – Public Health and Amenity

- 4.279 This policy seeks that lighting, noise, dust, odours and other emissions do not have unacceptable impacts on public health and amenity; that public rights of way are safeguarded; and that a site liaison group be established.
- 4.280 Impacts on public health and amenity are addressed in the ES and no adverse impacts have been identified, with the proposed mitigation in place.

- 4.281 Public rights of way remain physically unaffected by the proposals. A site liaison committee already exists and the applicants will ensure that this continues to operate.

W21 – Cumulative Impact

- 4.282 This policy seeks to avoid an unreasonable level of disturbance to the environment and/or local communities as a result of waste management and other sites operating simultaneously and/or successively.
- 4.283 The site currently operates as a waste management site. Cumulative effects with the proposed ERF and WSTF have been addressed in the ES. A number of development proposals have been identified that are planned, with planning permission or proposed, in the local area. The findings of the ES are that there will be some cumulative effects. However, it can be concluded that there will not be an unreasonable level of disturbance, in line with this policy.

W22 – Aerodrome safeguarding

- 4.284 Policy W22 states that proposals for waste development will be permitted provided that they will not adversely affect the operational integrity or safety of aviation facilities.
- 4.285 Goodwood Aerodrome and NATS have both been consulted on the proposals prior to submission and both have confirmed there is no objection to the proposals. An aerodrome safeguarding statement is included with the planning application.

Overall conclusion on compliance with the Waste Local Plan

- 4.286 In conclusion it is considered that the proposals satisfy all policies of the WLP. Further discussion with regard to the site-specific principles identified in the WLP for the development of the Ford strategic waste site is included in chapter 5: main considerations.

Arun Local Plan 2011-2031 (July 2018)

- 4.287 The Arun Local Plan was adopted in 2018 and sets out the vision for the future of the district, and guides development to achieve that vision. Whilst it does not include waste policies that affect the determination of the application, that being the domain of the WLP, other policies are considered relevant where they relate to economic, social and environmental matters, and the management of development in the area.
- 4.288 Relevant policies include:
- Policy SD SP2 – Built-up Area Boundary. This states that development should be focused within the Built-up Area Boundaries and will be permitted, subject to consideration against other policies of this local plan. The site is located within one such Built Up Area Boundary and therefore this policy supports development, subject to the wider consideration referred to.
 - Policy LAN DM1 – Protection of Landscape Character. This seeks to protect the setting of the South Downs National Park and address respect for wider

landscape character issues, and in this respect has similar aims to policies W11, W12 and W13 of the WLP. Matters relating to landscape character impacts are addressed in the landscape and visual impact assessment, reported in the Environmental Statement, and discussed in the context of the WLP policies above. Just as the WLP policies are met on this issue, the requirements of this policy are also met.

- Policy LAN DM – The Setting of Arundel. This policy aims to protect the setting of Arundel. Whilst the site is not within the area shown on the proposals map as defining the setting, the policy generally seeks to protect views outward from the town. Views from Arundel are addressed in the landscape and visual impact assessment and reported in the Environmental Statement. This confirms that there will be adverse effects on views from the town, however it is not considered that these are unacceptable.
- Policy H SP2 & H SP2c – Strategic Site Allocations. These policies are relevant because they identify a strategic housing allocation at Ford (SD8) that surrounds the application site. The allocation is for 1500 new homes, employment, ancillary commercial and retail facilities, and schools and other community facilities. Whilst this policy itself has no direct bearing on the planning application, the interrelationship of the proposals for the ERF and WSTF with the strategic housing proposals is addressed in Appendix 2 of this document.
- Policy D SP1 – Design. This seeks to secure good design, and in this respect has similar aims to policy W12 of the WLP that is discussed above, showing that policy compliance is achieved.
- Policy D DM1 – Aspects of Form and Design Quality. This policy provides guidance and requirements on aspects of form and design quality. As for D SP1 above, it has similar aims to policy W12 of the WLP that is discussed above, and that is specifically relevant to waste management development as opposed to general types of development. This shows that in the context of the specific waste policy, compliance is achieved.
- Policy ECC SP2 – Energy and Climate Change Mitigation. This policy requires development to be energy efficient and for all major development to produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site. The proposed development will recover energy from residual waste, which is a form of low carbon energy generation. It will meet all its own energy requirements from this process, as well as exporting energy to the electricity grid, with potential to export heat to nearby heat customers if these can be secured and commercial terms agreed. The proposals therefore fully comply with this policy.
- Policy ECC DM1- Renewable Energy. This provides policy support for renewable energy development subject to the criteria in policy. The proposals include an ERF that will recover energy from residual waste, this being a form of renewable or low carbon energy, and is therefore supported by this policy, subject to meeting the criteria. The criteria cover environmental and amenity impacts, including landscape; integration with existing or new development; and demonstration of a suitable connection to the electricity distribution network. These matters are covered in the ES submitted with the application. The impacts of the proposals and their link to the electricity distribution network are not unacceptable, and the ERF is also well located to integrate with existing and new development.

- Policy T SP1 – Transport and Development. This policy seeks to ensure that development provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network. It has similar aims to policy W18 of the WLP that is discussed above, and that is specifically relevant to waste management development as opposed to general types of development. This analysis shows that in the context of the specific waste policy, compliance is achieved.
- Policy T DM1 – Sustainable Travel and Public Rights of Way. This policy seeks to ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport. The proposals are a secure waste management facility, to which the public will not have general access other than by prior arrangement to the education centre. However, workers and visitors will have provision for safe pedestrian and cycle access, including cycle parking to meet the required standards. The visitor facilities include minibuss parking space and provision for access for those with mobility impairments. It is considered that this policy is met.
- Policy HER SP1 – The Historic Environment. This policy seeks to provide protection for designated and non-designated heritage assets and their settings. It has similar aims to policy W15 of the WLP that is discussed in more detail above. The ES includes a heritage assessment that considers impacts on heritage assets of both types that might be affected by the proposals, as summarised in chapter 5. This analysis shows that compliance is achieved.
- Policy HER DM3 – Conservation Areas. This policy seeks to conserve and enhance Conservation Areas and their settings. Since the proposals are not in or adjacent to any Conservation Areas, the only relevant part of the policy is part f) that relates to views into, out of or within Conservation Areas. There are Conservation Areas near to the site, and impact on the setting of these has been addressed in the submitted ES. From the results of the assessment, it is concluded that there will be no unacceptable impacts. The requirements of this policy have been met.
- Policy HER DM5 – Remnants of the Portsmouth and Arundel Canal. This policy seeks to protect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it. The application site was once crossed by the canal, but there are no remnants of it, these having been removed in construction of the Ford Airfield. However, the archaeological context reported in the ES has examined the canal archaeology on site. The design of the site layout includes features to acknowledge the alignment of the former canal at the eastern and western boundaries of the site.
- Policy HER DM6 – Sites of Archaeological Interest. This seeks to protect sites of archaeological interest and sets out requirements for assessment, evaluation and recording. The ES includes a heritage assessment that addresses these matters and confirms that a programme of investigation will be provided. The requirements of this policy have therefore been met.
- Policy ENV SP1 – Natural Environment. This encourages and promotes the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and seeks protection of both designated and non-designated sites. It also promotes the creation of new areas for habitats and species and seeks to protect designated sites identified

in the plan. It has similar aims to policy W14 of the WLP that is discussed above. The ES includes a natural heritage assessment that considers impacts on designated sites that might be affected by the proposals, and a Habitats Regulations Assessment screening report is also provided with the application. The requirements of this policy have therefore been met.

- Policy ENV DM4 – Protection of Trees. In accordance with this policy, the planning application is accompanied by an arboricultural impact assessment including a tree protection plan and arboricultural method statement. A comprehensive view of tree issues has been taken account of in the design process, and the development will not have a negative impact on existing trees. The proposed development gives the opportunity to increase and enhance the tree cover through the proposed landscaping scheme.
- Policy ENV DM5 – Development and Biodiversity. This policy seeks to achieve a net gain in biodiversity and protect existing habitats, and to have elements of biodiversity included in development proposals. It has similar aims to policy W14 of the WLP that is discussed in more detail above. The design of the proposals includes new areas of habitat. The ES includes a natural heritage assessment that includes an assessment of biodiversity gain. The requirements of this policy have therefore been met.
- Policy W SP1 – Water. This policy seeks to have water efficiency measures in place to protect water resources and enhance the quality of the water environment, including addressing flood risk and climate change resilience, and shares characteristics with WLP policies W16 and W17 in this respect. Further information on compliance with these WLP policies is included above. The ES includes a water assessment. The requirements of this policy have therefore been met.
- Policy W DM1 – Water Supply and Quality. This policy seeks to ensure that there is sufficient water supply and that water quality is protected. It shares characteristics with WLP policies W16 and W17 in this respect. Further information on compliance with these WLP policies is included above. The ES includes a water assessment. The requirements of this policy have therefore been met.
- Policy W DM2 – Flood Risk. This policy requires the assessment of flood risk. A flood risk assessment has been prepared and is included as an appendix to the ES. This meets the requirements of this policy.
- Policy WM DM1- Waste Management states that, in accordance with the West Sussex Waste Local Plan, there will be a general presumption against any development which may harm or prejudice the operation of existing and allocated waste facilities and infrastructure. This is relevant in the context of the strategic housing proposal at Ford and its relationship with the existing (and proposed) waste management activities at the application site. This policy supports the idea that the new homes at Ford should be located an appropriate distance from the waste site boundary, and the new housing proposals should mitigate for potential effects on new residents.
- Policy QE SP1 – Quality of the Environment. This policy seeks to prevent a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities. This is addressed in the ES and a summary is also provided in chapter 5 of this document. The conclusion is that there will be no adverse effects on residential amenity, natural environment or upon leisure and recreation.

- Policy QE DM1 – Noise Pollution. This policy requires that new noise generating development should be subject to noise assessment. This is addressed in the ES and a summary is also provided in chapter 5 of this document.
- Policy QE DM2 – Light Pollution. This requires that development proposals that include outdoor lighting should be accompanied by a lighting scheme. A lighting scheme that meets the requirements of this policy is provided with this planning application.
- Policy QE DM3 – Air Pollution. This requires that major development proposals should have an assessment of potential air quality impacts. This is addressed in the ES and a summary is also provided in chapter 5 of this document.
- Policy QE DM4 – Contaminated Land. This policy requires evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development. This is addressed in the ES and a summary is also provided in chapter 5 of this document.

Ford Neighbourhood Plan 2017-2031 ('made' 9th January 2019)

4.289 The Ford Neighbourhood Plan was made in 2019 and is in general conformity with the strategic policies contained in the WLP 2014 and the Arun Local Plan 2018.

4.290 Relevant policies include

- Policy SA1 –Ford Airfield. This policy provides for the development of the new housing and related facilities under policy H SP2 and S8 of the Arun Local Plan. The interrelationship of the proposals for the ERF and WSTF with this strategic housing proposal is addressed in Appendix 2 of this document.
- Policy EH1 – Protection of Trees and Hedgerows. The proposals are accompanied by an arboricultural assessment that shows that there will be no removal of any significant trees or hedgerows. The proposals also provide for new planting that will increase the biodiversity of the site. It is considered that the proposals therefore meet the requirements of this policy.
- Policy EH4 – Surface Water Management. The proposals are accompanied by a surface water drainage strategy and flood risk assessment that show that the requirements of this policy are met.
- Policy EH8 – Light Pollution. This policy specifically seeks to have lighting design to minimise impact on the night sky. The lighting proposals have been designed with this in mind. The requirements of this policy are met.
- Policy EE1 - support for business. This policy supports extension of existing employment buildings, subject to no unacceptable harm to amenity and environment. Whilst the proposals in the planning application are not an extension of a building, they are expansion of a local employment generating use, so should also be supported on the same basis. The applicants consider that there are no unacceptable impacts when balanced with other considerations such as planning policy at all levels and the benefits of sustainable waste management and energy generation.
- Policy EE3 – Protection of Existing Businesses. This policy seeks to ensure that new development does not conflict with existing businesses. The

supporting text provides an example of new residential development being located away from existing businesses that generate noise or odour. This is relevant in the context of the strategic housing proposal at Ford and its relationship with the existing (and proposed) waste management activities at the application site. This policy supports the idea that the new homes at Ford should be located an appropriate distance from the waste site boundary, and the new housing proposals should mitigate for potential effects on new residents.

- Policy EE10 – Quality of Design of Commercial Buildings. This policy requires that new buildings should be of high-quality design, be energy efficient and designed to be in harmony with the landscape setting and contribute positively to the environment. The submitted design and access statement provides information about the design and how it complies with design policies.
- Policy GA1 – Footpath and Cycle Path Network. This policy resists loss of existing footpaths and cycle paths and encourages provision of new ones. Whilst the proposals do not provide any new paths, those that exist offsite at the site boundary will not be physically affected by the development.

4.291 All of these neighbourhood plan policies are reflected in other policies of the development plan, and the matters they raise are addressed in the ES and/or elsewhere in this document.

5.0 MAIN PLANNING CONSIDERATIONS

5.1 The main planning considerations include:

- policy regarding waste and energy, which largely establish the need for the ERF and WSTF and provide the strategic site allocation
- whether the proposals satisfactorily address the site-specific development principles as set out in the WLP
- whether the environment and amenity effects are acceptable.

Waste and energy policy

- 5.2 Waste and energy policy have been addressed in chapter 4 of this document. This shows that the proposals are consistent with such policy at all levels in so far as they would enable the sustainable treatment of mixed residual waste supporting the diversion from landfill.
- 5.3 The application site is one of the sites identified in W10(a) (see the first bullet, site north of the WTW at Ford). The development provides for energy recovery and waste sorting and transfer, which are both in the range of waste management facilities stated as being acceptable in principle at the site.
- 5.4 The site is allocated for waste management development in an adopted and up to date waste local plan. Furthermore, given the ability to secure R1 recovery status and future potential for CHP the ERF will be highly efficient in delivering low carbon energy from residual waste that cannot be recycled.
- 5.5 We note that the WLP was reviewed in 2019 and no changes were made to the allocations or safeguarding of sites. Indeed in 2019 WSCC also approved a new access to the site and a change to the s106 agreement to allow up to 240 HGVs a day (each way). This highlights its continued importance and capacity as a waste treatment site.
- 5.6 These matters should be given substantial weight in favour of the proposals, which are consistent with the aims of local and national waste management policy.

Site specific development principles

- 5.7 The development is in accordance with the other policies of the WLP and addresses the development principles in the policy W10's supporting text, as required by W10(c) and as detailed below.
- 5.8 Para 7.3.1 of the WLP states that a detailed technical assessment by WSCC of the sites in W10 has identified no overriding constraints, and that potential adverse impacts can be prevented, minimised, mitigated or compensated for to an acceptable standard. The application and its supporting documents provide information that supports this conclusion.
- 5.9 Para 7.3.3 of the WLP specifies that wherever possible, proposals for facilities involving thermal treatment should include the generation and distribution of heat and power.

- 5.10 The Ford ERF provides a form of thermal treatment and incorporates a steam turbine that will generate heat and power. Electricity will be exported to the national grid. The turbine will also have heat offtake capability and space is reserved in the layout for heat plant, and pipework is provided to the site boundary at Ford Road to facilitate export. Opportunities to export to nearby potential heat users, subject to commercial terms, are also being actively explored (see the heat plan that accompanies the application).
- 5.11 Para 7.3.8 of the WLP says that in theory the site has the physical capacity to deliver a single built facility (up to c.250,000tpa) or a number of smaller facilities; however, the actual waste management capacity achieved on the site would depend upon the specific type of facility/facilities and the chosen technology or technologies.
- 5.12 The application provides two facilities, an ERF and a WSTF that together provide 295,000 tpa of capacity. Whilst this is greater than the c250,000 tpa stated, it is noted that the figure stated is approximate and that it is acknowledged that capacity will depend on the proposals. The implication is that a provision in excess of 250,000 tpa is potentially acceptable.
- 5.13 It is notable that the building size, massing, height and footprint of the facilities as proposed would not be changed by limiting the throughput to 250,000 tpa. Importantly the proposals will be able to operate with 295,000 tpa and keep within 240 HGV movements in and out each day, as currently allowed by the s106 agreement.
- 5.14 Para 7.3.9 of the WLP sets out a series of principles that are expected to be addressed in the development of the site. The design of the proposals has had regard to these principles and also to consultation with WSCC officers and local community representatives and site neighbours. Environmental issues have also informed and influenced the design of the facilities.
- 5.15 The development principles for the Ford site are as follows, accompanied by a commentary on how each is addressed:
- *development of the site to be comprehensive.* The proposed ERF and WSTF and the various ancillary buildings and structures will occupy the entire site, providing a comprehensive development of the site. This is further described in the Design and Access Statement.
 - *comprehensive landscaping scheme required.* As part of the above, a comprehensive landscape scheme is provided, including bunds and planting with native species. This includes conservation grassland, scrub, trees and drifts of gravel to provide a varied habitat as well as providing screening and softening of the views of the site from adjacent areas. These planted areas will also integrate with existing landscape features offsite, such as the existing vegetated bund next to the site boundary to the east, the tree belt to the north, and the existing small woodland next to the south western boundary.
 - *assessment of impact on the listed buildings to the north and possible mitigation required.* The presence of the listed buildings to the north (and elsewhere in the vicinity of the site) has been recognised and assessed in the ES as required. The assessment concludes that there will be adverse impacts on the setting of the listed buildings to the north. Given the large scale of the

proposals some impact on the setting of these buildings is inevitable. The size of the ERF building and the height of the flue stack means that these cannot be screened. However, there is mitigation through provision of a high-quality design that aims to respect local character, careful consideration of visual bulk and mass through building form, colour and choice of materials, and to provide appropriate screening at low levels.

- *if substantial new ground excavations are proposed, low-level archaeological mitigation required.* Archaeology has fully been addressed in the ES and the scope of this assessment has been informed by WSCC's EIA scoping opinion and direct dialogue with the County Archaeologist. The development of the site as proposed will require ground excavation, and this will be accompanied by a programme of investigation to be agreed with the County Archaeologist, to investigate and record any archaeology that may be found. Preservation by record is widely accepted as an appropriate means of mitigation.
- *assessment of impacts on the water environment (major aquifer) and possible mitigation required.* The proposals have been designed to avoid direct impacts on the major aquifer. Impacts on water environment are addressed in chapter 11 of the ES, along with ground conditions. This includes assessment of potential for indirect impacts on the aquifer. The assessment concludes that with mitigation measures in place, there will be no significant effects on ground conditions, groundwater and surface water quality during construction of the development. The mitigation measures are included in an Outline Construction Environment Management Plan (CEMP) provided as a technical appendix to the ES. A detailed CEMP can be provided once a contractor is on board to carry out the works. With the specified measures in place, no significant residual risks are predicted in association with ground conditions, the water environment or flood risk.
- *assessment of impacts on the amenity of users of public rights of way and possible mitigation and enhancement required.* A single public right of way runs adjacent to the north eastern site boundary and there are others in the vicinity. Various aspects of amenity are addressed in the ES. The proposed buildings and the site layout have been designed to minimise amenity impacts such as noise, odour and dust nuisance, with all processes enclosed in buildings, and site circulation and building positions being laid out to provide shielding and to minimise vehicle reversing as much as possible. Equipment and plant that generates noise will also be provided with noise insulation. A range of design and management measures are included to avoid nuisance arising from odour, dust, pests and litter. There is also a combination of bunds, new planting and acoustic fencing at the site boundaries to further minimise noise and provide low level visual screening of site activity and vehicle movements. The assessment in the ES concludes that with these mitigation measures in place there will be no odour, air quality, or dust effects, although there is predicted to be a moderate adverse noise effect during night time at a residential property to the north east. In general, users of the public rights of way are deemed to be less sensitive receptors than occupants of residential properties, as their experience is temporary and transitory as they pass through an area, and the impacts on users of the rights of way are therefore satisfactorily addressed. Further details of the noise, odour and air quality assessments are provided in the ES and supporting technical appendices.

- *assessment of impact (e.g. traffic, noise, odour) on the amenity of dwellings to the north east and south west and possible mitigation required.* Various aspects of amenity are addressed in the ES, and the dwellings to north east and south west are addressed in the assessment of these. The proposed buildings and the site layout have been designed to minimise amenity impacts such as noise, odour and dust nuisance, with all processes enclosed in buildings, and site circulation and building positions being laid out to provide shielding and to minimise vehicle reversing as much as possible. Equipment and plant that generates noise will also be provided with noise insulation. A range of design and management measures are included to avoid nuisance arising from odour, dust, pests and litter. There is also a combination of bunds, new planting and acoustic fencing at the site boundaries to further minimise noise and provide low level visual screening of site activity and vehicle movements. All site traffic will enter and leave the site via the recently constructed site access to Ford Road, so traffic will not pass close to the dwellings to the north east and south west of the site. The assessment in the ES concludes that with these mitigation measures in place there will be no odour, air quality, or dust effects, although there is predicted to be a moderate adverse noise effect during night time at a residential property to the north east. Given that this affects only a single property it is considered that this principle is therefore satisfactorily addressed. Further details of the traffic, noise, odour and air quality assessments are provided in the ES and supporting technical appendices.
- *the cumulative impacts of traffic, noise and odour on the environment and local communities to be satisfactorily addressed and mitigated as required, taking into account all existing, permitted, allocated, or proposed development within the wider area.* Cumulative impacts are addressed in the ES. The assessment in the ES concludes that with mitigation measures in place there will be no cumulative traffic or odour effects with the proposed mitigation in place, although there is predicted to be a moderate adverse noise effect during night time at a residential property to the north east. Given that this affects only a single property it is considered that this principle is therefore satisfactorily addressed. Further details are provided in the ES and supporting technical appendices on noise, odour and dust, and landscape and visual impact.
- *assessment of the possible closure of the existing access north of Rodney Crescent and the use of an alternative access to the site from Ford Road.* The access north of Rodney Crescent is now closed and a new site access is in use, located further south and providing access to Ford Road. This principle has therefore been superseded by this new arrangement, which provides benefits in terms of removing traffic and associated effects from the vicinity of residential properties in Rodney Crescent.
- *assessment of impact of additional HGV movements on highway capacity and road safety, including at the Church Lane and A259 junction and possible mitigation required.* The proposed development, when operational, will not result in more HGV movements than are currently allowed at the site under an existing s106 legal agreement related to the new site access road (240 two way HGV movements per day and 120 per day on Saturdays). The applicants intend that the proposed development will operate within these limits. Traffic and transport is addressed in the ES and includes assessment of highway capacity and road safety. This assessment includes consideration of the

Church Lane and A259 junction. It concludes that no significant traffic and transport effects are predicted overall as a result of the proposed development.

- *a routing agreement is required to ensure vehicles enter and exit via Ford Road to the south, and not to or from the A27 to the north. Access via Rollaston Park/B2233 for HGVs should also be prevented.* The applicants are content to have a routing agreement in line with this principle, which is facilitated by the new site access to Ford Road that is now in use and that already operates a restriction on HGV traffic movements to the north, all HGV traffic turning south out of the new junction with Ford Road. This is secured in an existing s106 agreement, and the applicants will enter into a new agreement that carries this forward for the new permission. Note that the access via Rollaston Park is now closed, so is effectively already prevented.

5.16 In conclusion, the development principles have all been satisfactorily addressed, as required by Policy W10(c) of the WLP.

Environment and amenity

5.17 The planning application is accompanied by an Environmental Statement (ES) that reports the findings of the environmental impact assessment (EIA) of the proposals. The applicants requested the WPAs opinion on the scope of the EIA, comprising the range of potentially significant environmental effects of the development, and this is set out in the WPA's scoping opinion (see ES Technical Appendix A for both the scoping request and the scoping opinion).

5.18 The ES reports on the assessment of environmental effects under these headings:

- Air quality
- Carbon and greenhouse gas emissions
- Health
- Community and social effects
- Cultural heritage
- Ground conditions and the water environment
- Landscape and visual effects
- Natural heritage
- Noise and vibration
- Traffic and transport.

5.19 These topics are raised to varying degrees in the various policy requirements discussed in chapter 4 of this document and in the development principles discussed above in paragraphs 5.7 to 5.16. This discussion shows that the development proposals and the associated consideration of environmental effects

are broadly in line with policy at all levels and that the effects after mitigation are satisfactory and not unacceptable in policy terms.

- 5.20 The results of the assessment are reported in full in the ES and are further summarised and brought together below.

Air quality, odour and dust

- 5.21 The assessment of the operation of the ERF included modelling the concentrations of a range of pollutants in the flue gas emissions. The flue gases will undergo a series of rigorous treatments that will clean the gases to a safe level before they are released to the atmosphere, and this will be enforceable in law through limits set in the Environmental Permits that are issued by the Environment Agency. The flue gas treatment system will therefore be designed to ensure that the ERF operates well within strict limits. The air quality modelling shows that there will be no significant effects on air quality, human health or designated nature conservation sites as a result of emissions from the ERF.
- 5.22 A range of best practice measures will be put in place to ensure that there will be no significant effects on sensitive receptors from increased dust generation during construction. It is considered that with the implementation of these measures there would not be any significant effects.
- 5.23 Traffic levels during the construction and operation of the proposed facilities will not cause significant effects on air quality.
- 5.24 There is the potential for dust and odour to arise during operation of the proposed facilities due to the delivery and unloading of waste materials. However, the potential for nuisance to arise will be very limited due to the containment and mitigation measures inherent in the design of the ERF and WSTF.
- 5.25 There is no risk of significant cumulative effects in relation to dust, odour or emissions.
- 5.26 In conclusion, the proposed development is not predicted to give rise to significant environmental effects on air quality, human health and odour.

Carbon and greenhouse gas emissions

- 5.27 The assessment showed that the ERF will provide a net carbon benefit of approximately 74,449 tonnes of carbon dioxide equivalent (tCO₂e) per annum when compared to the baseline. Therefore, over the lifetime of the development (assumed to be 25 years) the net carbon benefit of the ERF will be approximately 1,861,225 tCO₂e compared to the baseline.
- 5.28 It is anticipated that there will be a carbon benefit associated with the development of the WSTF when compared to the existing WTS. There will be reduced transport requirements - the carbon emissions associated with the transport of 100% of the waste off-site from the existing WTS will result in significantly higher carbon emissions than the transport of two thirds of the waste off-site, as would be the case for the proposed WSTF.

- 5.29 The recovery of recyclates from the incoming waste at the WSTF will displace extraction of primary resources and the production of materials which would otherwise need to be produced. The WSTF will also reduce the quantities of waste which would otherwise potentially be transferred for disposal.
- 5.30 In addition, the ERF and WSTF will both have solar photovoltaic cells on the roof to generate renewable energy and car parking spaces provided with electric charging points.
- 5.31 It has therefore been concluded that there will overall be a significant positive contribution to reducing carbon emissions when compared to the baseline.

Health

- 5.32 The emissions from the ERF at the point of maximum impact for agricultural, allotment and residential receptors (both adult and child) were assessed.
- 5.33 The human health risk assessment concluded that there will be no significant adverse health effects at any of the sensitive receptors considered, including farms, allotments, residential properties (existing and future) and schools (existing and future), as a result of the proposed development. No cumulative effects were identified.

Community and social effects

- 5.34 Waste will be delivered to the site via the recently constructed access road that is already used to deliver waste to the site, and traffic levels will not exceed the levels allowed under the s106 agreement that limits this. No significant effects are predicted as a result of the transport of waste.
- 5.35 A number of measures have been incorporated into the building design and operational procedures to minimise effects from dust, odour releases and noise. The ERF will be operated to stringent standards and, apart from a single predicted moderate effect arising from noise at night at one dwelling, no significant amenity issues are envisaged.
- 5.36 A review of studies of property values and the provision of local services and facilities before and after the construction of ERFs has not shown evidence of any significant adverse effects. As a result, the proposed development is not predicted to lead to significant effects on house prices and housing supply, or education and local services. The proposed development will be seen in the context of existing buildings and structures in the surrounding area and will not significantly alter the visitor experience to the area. It is therefore not predicted to significantly affect tourism.

Cultural heritage: archaeology

- 5.37 The proposals will involve groundworks which will inevitably have an impact on any archaeological remains. The assessment concluded that the effects on archaeology can be wholly mitigated through an agreed programme of targeted investigation and subsequent preservation by record. The knowledge gained in that process is predicted to result in a moderate, beneficial effect.

- 5.38 The site has elements that attest to its former use in two distinct periods of transport history (associated with the canal and the airfield). The heritage will be celebrated and its awareness increased by the implementation of a number of enhancement and heritage interpretation measures within the proposals. This result in a moderate, beneficial effect.

Cultural heritage: built heritage

- 5.39 There are no designated heritage assets anywhere on site. The two former hangars on the site are examples of a standard and common building type, have been extensively altered and are in the greatly changed setting of the redeveloped airfield.
- 5.40 The closest listed building (grade II) to the site is Place Farm approximately 210 m north - north east. The proposed development will lead to the alteration to some qualities and character of part of the setting of the house, which is considered to be an adverse effect.
- 5.41 St Andrew' Church at Ford lies approximately 725 m east of the site and is a grade I listed building. The alteration to the qualities and character of the setting of the church as a result of the development are considered to be an adverse effect.
- 5.42 The group of designated heritage assets at Climping (grade I St Mary's Church, grade II rectory and scheduled monument earthworks) are approximately 1 km south of the site. The presence of the completed development will not alter the qualities and character of the setting of these assets and no significant effects are predicted.
- 5.43 St Mary's Church, Yapton lies approximately 1.1 km west of the site and is listed grade I. The alteration to the qualities and character of the wider setting of the church are considered to result in an adverse effect.
- 5.44 The alteration to the qualities and character of the setting of the Yapton Church Lane conservation area are considered to result in a slight adverse effect.
- 5.45 For the built heritage assets beyond 1 km, including Lyminster conservation area and Tortington, the proposals are not found to be a significant visual intrusion or detraction from the present setting of designated heritage assets.
- 5.46 The ERF building will be sited approximately 4.5 km south of Arundel Castle and will appear as a distant structure that will occupy a very small part of a much wider view. The alterations to the qualities and character of the setting of Arundel Castle are considered to result in an adverse effect. There will be no significant visual intrusion within the registered parkland, and the character and appearance of the town's conservation area will remain unchanged.

Ground conditions

- 5.47 With proposed mitigation measures in place (for example undertaking an intrusive ground investigation, completion of a foundation works risk assessment and remediation strategy, which will include groundwater and surface water monitoring and the implementation of a construction environmental management plan) no

significant residual risks are predicted in relation to ground conditions. No cumulative effects are predicted on ground conditions either.

Water environment

- 5.48 With the implementation of a detailed construction environment management plan and surface water and groundwater monitoring in place, no significant residual effects are predicted in relation to the water environment. No significant cumulative effects are predicted either.

Flood risk

- 5.49 Environment Agency indicative flood risk mapping shows that the proposed site is entirely located in Flood Zone 1, i.e. it is at low risk of flooding from rivers and the risk of flooding from surface water within the site boundary is considered to be low.
- 5.50 It is proposed that surface water runoff is temporarily held in large impermeable cellular storage tanks below ground, prior to being discharged gradually into the land drain to the east of the site. Rainwater harvesting is also proposed for the development and will be further detailed in future design stages.
- 5.51 If rainfall exceeds the storage capacity of the tanks, the site has been designed to allow for shallow ponding (approximately 150 mm average depth) on external hardstanding areas. This will ensure that there will not be an increase in flood risk downstream.
- 5.52 To aid in minimising the impact to the surrounding environment in terms of water quality as well as water quantity it is proposed to install “light liquid” separators as part of the proposed formal surface water drainage system.
- 5.53 No significant effects on flood risk are therefore predicted during the construction or post-construction stages of the development. Due to this no significant residual or cumulative effects are predicted.

Landscape and visual effects

- 5.54 Although the landscape character area is already influenced by existing industrial development, the size and scale of the proposals will increase the extent of visual influence of industrial elements in the landscape. The design is of high quality and although the appreciation of the design will be subjective, it strongly relates to the history of the site and may be regarded as a landmark feature of interest, contributing to a landscape that lacks distinctiveness.
- 5.55 The character of the site will remain industrial but the scale will be altered through the introduction of taller structures than the existing. However, the quality of the design and materials will improve the overall character and distinctiveness of the site, which will be beneficial.
- 5.56 The assessment of the effects on the majority of landscape receptors concludes that for many, there will be small or medium changes that will result in adverse effects.

- 5.57 All visual receptor groups in the local area up to 4.5 km away will experience the large scale of the building and stack in views and it will be a noticeable feature resulting in adverse effects.
- 5.58 The coastal plain that comprises the wider landscape setting of the South Downs National Park includes several large-scale features, large areas of urban development, and numerous large-scale areas of greenhouses and polytunnels, and the effects of the proposals were assessed within this landscape context. Whilst the resulting change from the more distant viewpoints will be negligible, in the closer viewpoints, due to the high sensitivity of this receptor group, the effects are assessed as adverse.
- 5.59 The assessment records several adverse effects on landscape and visual receptors, largely arising from the scale and height of the ERF building and its stack. However, as a strong sculptural form in high quality materials that reflects its local context, the ERF may be regarded as a positive, large scale landmark that appears appropriate in the expansive flat landscape.
- 5.60 In considering these results, the proposed development integrates with its surroundings to a satisfactory degree, and the effects identified are acceptable and would not conflict with the aims of WLP policies W1, W12 or W13 or the design and landscape policies of the Arun Local Plan and Ford Neighbourhood Plan.

Natural heritage (ecology)

- 5.61 The Arun Valley Ramsar, Special Area of Conservation and Special Protection Area is approximately 10.17 km north east of the proposed development. Duncton to Bignor Escarpment Special Area of Conservation is approximately 9.9 km north.
- 5.62 Due to the distance of the site from the nearest Special Area of Conservation and Special Protection Area, no effects were considered to arise during construction. The air quality modelling showed an extremely low contribution of pollutants at the distances involved and therefore no significant effects were identified once the development is operational.
- 5.63 Ford Ancient Woodland is a priority habitat and is located approximately 1.3 km to the north of the proposed development site. As for the aforementioned protected sites, the ancient woodland is sufficient distance from the site and main access routes for there to be no effects from the construction phase, and air quality assessment found that there would be no significant effects with the development in place.
- 5.64 The development site itself largely comprises colonised hardstanding, with small areas of unconnected, poor, semi-improved grassland, scrub, a non-native hedgerow, scattered trees and buildings, all of which are considered to be of low value ecologically. A range of common invertebrate species are likely to be present and breeding birds may use the existing scrub vegetation and hedgerows for nesting purposes.
- 5.65 The proposed habitat mitigation planting scheme for the site will result in the creation of an additional 0.508 ha of habitat compared to the existing levels.

Furthermore, the habitats created will be of higher biodiversity value than the existing habitats.

- 5.66 In addition to the mitigation habitats to be created on site, additional habitat and species-specific features will be created and installed to provide enhancements for the site. These will include: 0.107 hectares of pollinator-rich grassland along the eastern boundary, 396 m of ground-based green walls (i.e. gabion walls planted up with climbers), 10 pear trees, 14 English oaks, 27 standard oaks, a wildlife pond planted with native aquatic vegetation, five bat boxes integrated into the flint walls, 15 bird boxes to encourage nesting by swift, house sparrow and wagtails, and five bug hotels.
- 5.67 There are therefore no significant adverse effects in relation to ecology. The measures set out above will be included in a landscape and ecological management plan for the site, which will specify the long-term management strategy for the proposed habitats and ensure they reach their target condition and are maintained at that condition.
- 5.68 Cumulative effects from the proposed development and other proposed developments nearby were assessed as having no significant effects on local ecological receptors.

Noise and vibration

- 5.69 The results of the noise and vibration study show that predicted demolition and construction noise levels will result in short-term, negligible effects. Similarly, it is expected that demolition and construction heavy goods vehicle traffic noise will result in short term, negligible effects.
- 5.70 The predicted operational daytime noise levels show negligible effects for all receptor locations. Negligible effects were also predicted for the majority of noise sensitive receptors at night time, with the exception of dwellings along Rollaston Park, which may experience slight effects, and one residential dwelling that is set back from Ford Lane, which may experience a moderate effect during the night time. Negligible to slight effects are predicted on existing sensitive receptors between 6 - 7am when site-related heavy goods vehicles will be operational. The 'night-time' noise measurement period includes 6 - 7am.
- 5.71 It should be noted, however, that the existing site operations at the WTS generate noise, as well as noise from the arrival and departure of HGVs and refuse collection vehicles. Therefore, it is considered that as there are already impulsive characteristics to the noise present on site during the day and early morning (6 – 7am) when HGV movements and sorting of waste is occurring, the predicted effects may not occur.
- 5.72 Best practicable means will be implemented during the demolition and construction phase of the development, to minimise the noise and vibration effects at receptors nearest to the construction works.
- 5.73 Noise mitigation measures have been designed into the proposed development. The majority of equipment with potential to create noise will be housed inside the main ERF and WSTF buildings and will include measures to contain noise from the noisiest elements. Within the ERF high levels of acoustic insulation will be installed

around the turbines and generator sets. Other potentially noisy equipment such as fans and motors will also be insulated. The site has been designed to provide sufficient distance between the low speed fans on the air-cooled condensers that are situated in the south east corner of the site and surrounding noise receptors.

- 5.74 Surplus spoil following construction will be used to create bunds. In combination with acoustic timber fencing and flint faced concrete walls, this will provide effective noise and visual screening around the site's perimeter.
- 5.75 All unloading and loading of vehicles will be undertaken inside the ERF and WSTF buildings, and vehicle access for delivery of waste or collection of ash or recyclable materials will be restricted to normal working hours. Both the ERF and WSTF have been designed to include one-way vehicle circulation systems, which also reduces the need for reversing vehicles and reversing alarms.

Traffic and transport

- 5.76 No construction or operational vehicles will be permitted to leave or access the site from the northern stretch of Ford Lane. The operational traffic flows will fall within the permitted heavy goods vehicle cap in the s106 legal agreement attached to the planning permission for the new access road (120 heavy goods vehicle movements to the site and 120 heavy goods vehicle movements from the site between 6am to 8pm Monday – Friday and 60 heavy goods vehicle movements to the site and 60 heavy goods vehicle movements from the site between 8 am to 6pm on Saturdays).
- 5.77 Overall there would be no significant effects anticipated as a result of the construction or operation of the proposed development. No changes are proposed to the local highway network, footways / cycleways or access to public transport services. Whilst it is noted that there will be an increase in heavy goods vehicle movements on Ford Road (south of the site access road) overall compared to the current baseline, this is within the approved HGV traffic levels for the site and there are no significant adverse effects anticipated as a result of the proposed development.

Conclusion

- 5.78 The proposed development will lead to a number of changes to the local environment, but a range of measures will be put in place to minimise potential significant adverse effects. The proposed mitigation measures and the significant effects of the proposals that are predicted to remain after mitigation are summarised in more detail in Chapter 16 of the environmental statement.
- 5.79 Where possible, measures have been incorporated into the development proposals to prevent or reduce the potential for adverse environmental effects. These primary mitigation measures are an integral part of the design and were considered in the impact assessments. The primary mitigation measures are summarised in table 16.1 of the ES.
- 5.80 Measures to help mitigate adverse effects identified during the assessment process have also been proposed for some of the environmental topics. These secondary mitigation measures are summarised in table 16.2 of the ES.

- 5.81 The residual effects, i.e. the significant effects remaining after mitigation, are summarised in table 16.3 of the ES.
- 5.82 These comprise mainly landscape and visual effects, along with associated effects on the settings of heritage assets. These are not able to be mitigated further given the size and scale of the proposed buildings and height of the flue stack. There is also a predicted noise effect on a single nearby dwelling at night.
- 5.83 However, it is considered that whilst there would be some adverse impacts that do not lend themselves to further mitigation beyond that already provided, this would not be unacceptable. Some impact could be reasonably expected to be associated with the allocation of the site in the WLP for a large waste management facility. This is recognised in para 7.3.1 of the WLP that states that, for the allocated strategic waste sites, potential adverse impacts can be prevented, minimised, mitigated or compensated for to an acceptable standard.
- 5.84 Overall and considering the development plan as a whole, the effect on the character and appearance of the area arising from the residual effects would be acceptable and would not conflict with adopted and up to date development plan policies.

6.0 CONSULTATION

Introduction

- 6.1 A Statement of Community Involvement (SCI) has been submitted with the planning application providing details of the pre-application public consultation that has been undertaken by the applicants.
- 6.2 The applicants recognise the potential impacts of the proposed development on local communities and the valuable contribution local people can make in helping to create the best possible planning applications for their communities.
- 6.3 There has also been consultation with the Waste Planning Authority and statutory and non-statutory consultees.
- 6.4 This chapter of the PSS is intended to provide an overview of the approach taken to the consultation, the feedback raised by consultees, and the applicants' response to key themes arising in the feedback.

Consultation approach

- 6.5 The importance of pre-application engagement is recognised in the government's National Planning Policy Framework (NPPF) updated in February 2019, which states that:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.” (Paragraph 39, page 13).

- 6.6 WSCC's Statement of Community Involvement (SCI) Third Review (December 2018) encourages developers to undertake early community consultation, particularly for major and/or controversial proposals. This 'front-loading' of involvement gives the local community an opportunity to participate in the formulation of a developer's proposal before a planning application is submitted, and allows the developer to benefit from local community knowledge.
- 6.7 In accordance with the NPPF and WSCC's SCI, the applicants have put in place a robust programme of community consultation, which focused on engagement with local stakeholders and communities during the pre-application period.
- 6.8 The applicants have carried out a five week community consultation programme, preceded by re-application engagement with local stakeholders to introduce the project.
- 6.9 The consultation process followed best practice guidance on public consultation, to make sure this was carried out in a clear and transparent manner. There were 3 primary objectives:
- to provide clear information about the proposals
 - to engage with the community and provide an opportunity to give feedback

- for the applicants' team to consider and review feedback about the evolving plans.
- 6.10 The applicants have, where possible, taken on board comments raised by stakeholders and the local community.

Consultation tools and scope

- 6.11 A range of tools were used, including:
- briefings and targeted communications with local political stakeholders, including parish councils and local ward councillors from both West Sussex County Council and Arun District Council
 - a newsletter distributed to 2,809 local homes and businesses (every address within a 2km radius of the site)
 - advertisements in local media and posters on notice boards in the area
 - a project website including an online feedback form (and a downloadable version of the form with a freepost address for posting)
 - an exhibition event, which was cancelled due to Government advice on social distancing; however the exhibition panels and associated information were published on the project website
 - a dedicated telephone helpline and email (promoted on all consultation materials)
 - a site visit to an operational energy recovery facility, for parish councils and local ward councillors.
- 6.12 In addition, following the close of the consultation period, an update was provided to a meeting of a Local Liaison Committee that was established as a link between the site operators and local community representatives.
- 6.13 Full details of all of the above are provided in the SCI.

Feedback

- 6.14 The types of comments received covered a wide range of topics, and are summarised in the SCI. Although a range of comment was received on a range of topic areas, the main themes with the greatest frequency in the responses broadly related to traffic and transport (79%) air quality (40%) and visual issues (34%).
- 6.15 The comments also include those that recognised the need for waste management infrastructure of this type and the benefits in terms of energy generation.
- 6.16 The SCI provides details of the types of key comments that were made, both supporting and opposing the proposals. It also provides a more detailed breakdown of the comments received, and outlines the applicant's response.

Waste Planning Authority and other pre-application consultation

- 6.17 Pre-application meetings have taken place with the Waste Planning Authority (WPA) and the Highway Authority (both WSCC). This has included planning and

highways officers, and the WPA's landscape adviser. A meeting was also held with planning officers at Arun District Council to outline the proposals. As a separate (but parallel) process, discussions have also taken place with the Environmental Permitting team at the Environment Agency.

- 6.18 The applicants also met with several of the parish councils in the vicinity of the site to introduce the project team and the proposals,
- 6.19 The applicants also submitted a scoping request to the WPA, outlining the proposed development and the scope of the Environmental Impact Assessment (EIA). The WPA's scoping opinion has informed the preparation of the Environmental Statement (ES).
- 6.20 Similarly, a scoping note was submitted to the Highway Authority and the response has been followed, alongside that in the EIA scoping opinion, in the preparation of the transport assessment.
- 6.21 The specialists carrying out the technical work for the EIA have also consulted directly with relevant statutory and on-statutory bodies.
- 6.22 Following the first pre-application meeting the WPA issued a letter with pre-application advice. The matters raised have been addressed in the preparation of the application and this supporting statement.
- 6.23 This included consulting Goodwood Aerodrome regarding safeguarding issues, and the outcome is no objection. An Aerodrome Safeguarding Statement has been submitted to outline the consultation carried.
- 6.24 The applicants have also met the developers of the strategic housing allocation that surrounds the site, to explain the proposals and to find out more about the emerging plans for the new housing and related development.
- 6.25 The applicants expressed the view that the development proposals for the strategic housing allocation and those for the strategic waste allocation should respect each other so that they can be good neighbours. The opportunity to supply CHP to the new development was offered, and the door was left open to further discussions.
- 6.26 The housing developers sent comments to the WPA regarding the EIA scoping request and these have been reviewed where relevant. The applicant has taken account of the strategic housing allocation in the design of the proposals and in the EIA.

Conclusions

- 6.27 In accordance with local and national guidance, the applicants have engaged with local residents, elected representatives, officers of the WPA, statutory consultees and neighbouring developers.
- 6.28 The issues raised have been used to help shape the proposals as they have developed towards the final application for submission.

- 6.29 Many of the issues raised in feedback from the public consultation are addressed in the mitigation built into the proposals, such as the compliance with emission standards, the design of the buildings and layout, and holding to the existing HGV traffic limits and routing plan. The applicants are committed to maintaining an ongoing dialogue with stakeholders and other interested parties as the application progresses through the planning process.

7.0 CONCLUSIONS

Overview

- 7.1 Section 38 of the Planning and Compulsory Purchase Act 2004 requires that the determination of this planning application should be made in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 Important material considerations for this planning application include national planning policy and guidance, national, regional and local waste management and energy policy and strategy, other policy and strategy, and the views of stakeholders, including statutory and non-statutory organisations and the community.
- 7.3 The applicants undertook an extensive review of the development plan and other material considerations and concluded that the main planning considerations that are relevant to this planning application cover three broad themes of policy regarding waste and energy, which largely establish the need for the ERF and WSTF and the strategic site allocation; the site specific principles identified in the Waste Local Plan (WLP) for the development of the site; and the general development management policies of the development plan, covering general sustainability, environmental and amenity issues.

Waste and energy policy

Waste

- 7.4 EU and national legislation sets recycling targets with a waste management preference of firstly reducing, then recycling, recovery (e.g. energy), and finally disposal (e.g. landfill). The ERF lies within the recovery option, the WSTF in recycling, and together they will manage around 295,000 tonnes of commercial and industrial (C&I) waste and municipal solid waste (MSW) per year sourced principally from West Sussex and adjacent counties plus Southampton, Portsmouth and Brighton and Hove.
- 7.5 There is an established need, expressed in national, regional and local policies, for facilities to divert residual waste arisings away from landfill. It also seeks to locate facilities as close as possible to the origins of the material being processed, and to make appropriate provision for the management of compatible waste streams, such as MSW and C&I waste, at jointly located facilities.
- 7.6 The need for residual waste management capacity located at a strategic site allocated in an up to date waste local plan is a material consideration to be given substantial weight in decision making.

Energy

- 7.7 The benefit of the facilities will also be felt in terms of energy recovery, with environmental benefits in terms of reducing carbon emissions and other greenhouse gas emissions from landfill.
- 7.8 The proposed ERF will be capable of generating approximately 31 MW of electrical power, of which approximately about 28 MW would be exported to the

national grid, the rest (3MW) being used to power on site activity. The exported 28 MW will provide enough low carbon electricity for about 68,000 homes.

- 7.9 Solar PV panels on the roofs of the buildings will also contribute up to 0.6 MW to the day to day energy needs of the ERF and WSTF.
- 7.10 The proposed ERF will have combined heat and power (CHP) capability. Heat, in the form of steam or hot water, could be supplied to future nearby customers thereby reducing the need to burn fossil fuels and helping to reduce heating costs. The applicant has identified potential heat users in the vicinity of the site and will actively explore taking this further, subject to commercial terms.
- 7.11 National energy policy supports the recovery of energy from the combustion of waste where it is in accordance with the waste hierarchy, and expects this to play an increasingly important role in meeting the UK's energy needs. The ERF will provide predictable, controllable energy, thereby contributing to the diversity and security of supply. The ERF will also meet the requirements of development plan policies in relation to climate change and energy, both in terms of its own use of energy, its electricity generation, and its ability to provide CHP. These are significant material considerations in support of the proposals.
- 7.12 Delivering sustainable development is a key objective of national planning policy and is a central theme of the strategic objectives of the local development plan. The National Planning Policy Framework (NPPF) confirms that great weight should be given to the delivery of sustainable development objectives and that there is a presumption in favour of sustainable development where this is deemed compliant with other policy.
- 7.13 The recovery of energy from residual waste in the form of electricity, coupled with the potential to capture additional benefit through future opportunities for the implementation of CHP, thus contributing towards climate change mitigation objectives, represents a significant material consideration that should be afforded considerable weight.

Site specific principles

- 7.14 The site specific principles identified in the WLP for the development of the site have all been satisfied. This includes comprehensive site development, a comprehensive landscape scheme, and a range of assessments of environmental and amenity matters as specified in the supporting text to policy W10.

Environmental effects

- 7.15 This planning application is accompanied by an Environmental Statement (ES), which is a report of the environmental impact assessment of the development proposals. The content of the ES accords with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).
- 7.16 The results of the environmental impact assessment take account of the proposed design of the ERF and WSTF, which incorporates a wide range of measures to minimise environmental effects. The main findings are summarised in chapter 5 of this Planning Supporting Statement, with regard to a range of environmental topics. These include air quality, community and health, cultural heritage, ground

conditions and water environment, landscape and visual effects and natural heritage.

7.17 The proposed development will result in changes to the local environment, but a range of measures will be put in place to minimise the potential for adverse effects.

7.18 Overall the ERF and WSTF will contribute to sustainable development. Notwithstanding the visual impact on receptors arising from what is necessarily a large building, the environmental effects of the project are successfully addressed through design and mitigation.

Benefits

7.19 The ERF and WSTF will bring the following strategic and local benefits:

- Make a significant contribution towards meeting national, regional and local waste policy by providing efficient and modern facilities for the recovery of energy from waste, recycling and waste transfer, helping to meet identified shortfalls at a site allocated for waste management use
- Provide appropriate treatment capacity required to manage the residual municipal, commercial and industrial waste arisings from West Sussex and neighbouring counties, whilst also supporting recycling targets
- Reduce the amount of waste that is disposed of to landfill (the least sustainable solution), contributing positively to achieving landfill diversion targets and zero waste to landfill
- Provide an integrated and efficient waste management solution, incorporating both ERF and WSTF at one location
- Help to ensure that waste is dealt with in proximity to where it arises as part of a national, regional and local network of facilities
- Generate low carbon/renewable electricity, 31 MW of electrical power, of which approximately 28 MW would be exported to the national grid, (enough to power about 68,000 homes)
- Provide predictable, controllable energy, thereby contributing to diversity and security of supply
- Meet the requirements of national, regional and local policies in relation to climate change and energy, both in terms of its own use of energy, its electricity generation, and its ability to provide CHP
- Safeguard the potential to provide heat to local communities and businesses as part of a future district heating network, subject to contracts and off-site infrastructure being in place
- Broadly conform with development plan policy at all levels
- Use a site allocated for strategic waste management facilities, in accordance with planning policy
- Provide a comprehensive redevelopment of a brownfield site
- Provide confident buildings of a high quality, striking and exemplar design that respects local character, to house safe and modern facilities
- Provide jobs during construction and operation, with opportunities for training and apprenticeships, contributing to a diverse local economy

- Not give rise to any unacceptable environmental impacts.

7.20 For these reasons, the planning application should be approved. This will secure essential capacity for waste management and low carbon/renewable energy generation, and provide the wider benefits summarised above.

APPENDICES

Appendix 1 Discussion of main issues in the Horsham appeal decision letter

Appendix 2 Interrelationship with strategic housing allocation at Ford (SD8)

Appendix 3 Section 106 agreement draft heads of terms

APPENDIX 1

Discussion of main issues in the Horsham appeal decision letter

- A1.1 Pre-application advice indicated that the main issues arising from an appeal regarding development at the Former Wealden Brickworks by Britanniacrest Recycling Ltd should be considered.
- A1.2 The appeal (Ref: APP/P3800/W/18/321896527) was approved in February 2020, and was in relation to a planning application (application reference: WSCC/015/18/NH) that was refused by WSCC planning committee on 11 July 2018).
- A1.3 The proposed development comprises a recycling, recovery and renewable energy facility and ancillary infrastructure at a site in Langhurstwood Road, Horsham, West Sussex.
- A1.4 The proposal replaces an existing WTS (up to 230,000 tpa capacity) with a new recycling facility and ERF with the same capacity (50,000 tpa recycling, 180,000 tpa recovery).
- A1.5 The proposal therefore has some similarities with this planning application in that it involves re-development of an existing waste site that is identified as a strategic waste site in the WLP. It provides a new ERF using similar technology. It is also adjacent to a large new housing development identified in the local plan. The ERF building is of a similar scale, although the Ford building will be taller, and the flue stack shorter, than at Horsham.
- A1.6 The Inspector's conclusions in allowing the appeal are therefore potentially of assistance in considering some of the issues and the planning balance.
- A1.7 The main issues identified in the Inspector's report are:
- consistency with the aims of local and national waste management policy
 - the effect on the character and appearance of the area
 - the effect on the living conditions of the local community, with particular reference to public perception of harm to health in relation to air quality
 - the effect on significance of heritage assets and if there is any harm whether this would be outweighed by public benefits of the scheme.
- A1.8 Taking each in turn these issues are considered below to draw conclusions of relevance to the determination of the current application.
- Waste management policy*
- A1.9 Waste management policy is reviewed in chapter 4 of this document. It is noted that the Inspector found that the policy in the WLP is up to date, relevant and effective.

- A1.10 In the context of the need to meet shortfalls in capacity identified in the plan, the Inspector concluded that it appeared likely that there remains a significant shortfall in recovery capacity.
- A1.11 The benefit in meeting an identified need was recognised by WSCC, and the Inspector considered that it attracts substantial weight. This is a general finding that also applies to the proposals at the Ford site.
- A1.12 The Inspector noted that at Horsham, whilst the exact sources of waste are not yet known as contracts have not yet been secured, the plant is designed to achieve R1 recovery status. This is an important factor in the need to move waste management up the waste hierarchy. The same conclusion can be reached for the Ford proposals as the submitted CHP Ready Assessment report demonstrates that R1 status can be achieved.
- A1.13 The Inspector gave little weight to the concern that the provision of energy from waste capacity may result in waste being managed further down the waste hierarchy than would otherwise be the case. It is clear that government policy continues to support energy from waste, and that locally there is a significant shortfall in recovery capacity. This general conclusion is also of relevance to consideration of the Ford proposals.
- A1.14 In conclusion on this main issue, the Inspector found that R1 status, and the contribution towards meeting an identified need for recovery facilities on a site allocated for such facilities in an up to date WLP, weigh substantially in favour of the scheme.
- A1.15 This conclusion is highly relevant to the proposals at Ford, where the same weight substantially in favour of the scheme would apply.

Character and appearance

- A1.16 It is noted that the Inspector found that the West Sussex High Quality Waste Facilities SPD (2006) is not consistent with the NPPF and is unduly restrictive in its requirement that development does not detract from the character of the County's rural areas, thereby placing a high level of protection on landscape irrespective of its value. It is given little weight as a result. Hence the applicants consider that little weight should be given to the SPD in this respect when considering the Ford application.
- A1.17 The Inspector finds that the Horsham proposal, although substantially larger than other individual buildings locally, can be said to integrate with adjoining land uses and would not be out of place. The same can reasonably be said of the Ford proposal, being located in an area with other commercial/industrial built development nearby, and allocated in the WLP for what amounts to an intensification of the existing use.
- A1.18 He judged that it would be reasonable to regard the form and appearance of the proposed development as high quality. Following the Inspector's analysis, the applicants consider that the proposals at Ford should also be judged as high quality; the proposals have been very carefully considered and composed, in terms of detailed design, site layout, materials and consideration of local character.

A1.19 The Inspector considered that the recently approved 'land north of Horsham' development would extend the suburban influence of Horsham in the local landscape, and its sensitivity to change should therefore be regarded as low. This is a similar context to Ford, where the proposed new community surrounding the site would have a similar suburbanising effect and resultant reduction in sensitivity to change.

A1.20 The Inspector did not dispute that there would be some adverse landscape and visual impact at Horsham. However, he considered that this would not be unacceptable.

A1.21 Whilst the landscape context differs, the applicants consider that a similar conclusion can be reached for the Ford proposals. There is some adverse impact identified in the LVIA results, as set out in the ES, but when balanced against the benefits of the proposals in meeting identified needs on an allocated site, and the recovery of renewable / low carbon energy from residual wastes, this would not be unacceptable.

Living conditions

A1.22 The Inspector notes that, whilst there is no dispute that public perception of harm is a material consideration, the factors informing the weight to be attributed to it include the existence or otherwise of objective justification for the concern and the degree to which land use consequences would flow from the perception of harm.

A1.23 This is a general point that should inform the judgements made on the Ford proposals too.

A1.24 The Inspector found that the air quality results in the Horsham ES are likely to be conservative such that actual environmental concentrations will be likely to be lower and the conclusion of no significant impacts can be given significant weight.

A1.25 This is also the conclusion of the Ford ES on air quality, where the results can also be treated as conservative.

A1.26 In the context of attempts by objectors to invoke the precautionary principle, the Inspector found this would not be justified given the ES conclusions and the lack of objection from the Council's Director of Public Health, and the Public Health England (PHE) statement on modern municipal waste incinerators dated 15 October 2019 that such facilities are not a significant risk to public health. He concluded that the Horsham proposal would be unlikely to have a significant adverse effect on public health.

A1.27 The Inspector found no evidence that other energy from waste developments within or adjacent to a developing urban area have adversely affected either house prices or demand for housing in the area.

A1.28 He found that it is unlikely that many people would move away or not move to the area as a result of the proposal, and that there is no compelling evidence that businesses would be deterred from relocating to the area, also noting that waste management activities already exist in large part.

A1.29 He gave only limited weight to the perception of harm to public health and concluded that the scheme would not give rise to a significant conflict between land uses in the area. The effect on living conditions of the local community with respect to air quality and public perception would be acceptable, and there is no conflict with policies W12, W16, or W19 of the WLP in this respect.

A1.30 The Inspector's findings and conclusions on these general matters relating to living conditions can reasonably be applied to the Ford proposal too, given the similar context.

Heritage assets

A1.31 The Inspector attached considerable importance and weight to each instance of harm to the significance of a designated heritage asset. He nonetheless considered that the proposal would make a substantial contribution towards meeting the identified need for waste recovery facilities and would be located on a site allocated for such purposes in an up to date development plan.

A1.32 These public benefits of the scheme would significantly outweigh the associated harm to the significance of designated heritage assets. He therefore concluded that the effect of the proposal on the significance of designated heritage assets would be acceptable.

A1.33 Whilst the specific assets and impact assessment differ, these general findings and conclusions of the Inspector on matters relating to heritage assets can reasonably be applied to the Ford proposal too, and that the effect of the proposal on the significance of designated heritage assets would be acceptable.

APPENDIX 2

Interrelationship with strategic housing allocation at Ford (SD8)

- A2.1 The application site, which is an existing waste management site and an allocated strategic waste site in the West Sussex Waste Local Plan 2014 (WLP), is surrounded by a site for a proposed new community identified in the Arun Local Plan 2018 (ALP) as strategic housing site SD8. This strategic housing site is also reflected in Policy SA1 of the Ford Neighbourhood Plan 2019 (FNP). It provides for 1500 new homes and related employment and community facilities.
- A2.2 The ALP allocation for the strategic housing site came after the adoption of the WLP and the 2015 approval of a planning application for a MRF and RWTF at the Ford strategic waste management site. Strategic housing site SD8 was therefore confirmed in the full knowledge of the existing waste management activity at the site, the proposed intensification of use via the 2015 approval, and the strategic waste allocation in the WLP that allows for expansion of activity at the site to a throughput of circa 250,000 tpa.
- A2.3 Notably the throughput estimate in the WLP is not expressed as a limit, and does not rule out a higher throughput. Nor does the WLP allocation limit the type of facility(ies) or the waste management technology to be used.
- A2.4 The development plan allocations in both the WLP and the ALP therefore see the potential for the strategic waste site, both in its current form and future configuration, and the strategic housing area to sit successfully side by side.
- A2.5 Notably the WLP, the ALP, and the FNP (and indeed the NPPF and NPPW) all contain policies that protect existing and allocated waste management sites from new development that might prejudice the implementation of the waste hierarchy and/or the efficient operation and development of waste facilities.
- A2.6 The ALP allocation for SD8 includes a generous area of land for the proposed housing capacity and associated commercial and community facilities, meaning there is ample scope to have new housing set well back from the waste site boundaries to avoid impacts on the existing (and potential) waste management activity, with appropriate landscape buffers or non-residential uses in the intervening area. This would allow the necessary separation that would meet the requirements of the national and development plan policies in this respect.
- A2.7 The applicants at the waste site consider that a successful co-existence can be achieved, subject to good planning and design, and careful consideration of mitigation on both sides.
- A2.8 The applicants have therefore been careful to consider the design of the proposals for the WSTF and ERF in the context of the existing baseline of the current waste management activities, and the change that will come with the establishment of the new community. This is on the reasonable assumption that policy will be followed and that the new community proposals will incorporate their own mitigation. The applicants have discussed this with the developers of the new community prior to submission of their planning application, emphasising the need for both developments to be designed to be a 'good neighbour' to the other, and pointing out opportunities for CHP supply to the new community.

- A2.9 Planning applications have now been submitted for the new community (application reference: F/4/20/OUT) and for related changes to the operations at Ford Airfield market (application reference: F/5/20/PL).
- A2.10 Disappointingly the outline application for the new community provides very little evidence to demonstrate how the proposed residential and employment uses can be compatible with the existing and future strategic waste related operations. The applicants have objected to the strategic housing site application on this basis, and are aware that this is a matter that the WPA has also expressed concerns about in its consultee comments to Arun District Council about application F/4/20/OUT.
- A2.11 The applicants consider that there are opportunities to design mitigation measures into the housing scheme. These include, but are not limited to, hard and soft landscaping, acoustic fencing, a revised layout and the provision of a standoff/buffer zone.
- A2.12 In addition, the extent of the strategic housing application only appears to take up a proportion of the allocated area, so there is plenty of room to accommodate the housing numbers proposed in the application whilst delivering a scheme which doesn't prejudice the current, permitted and future strategic waste management activities.
- A2.13 It is considered that the housing layout can be reconfigured to provide an optimum distance between sensitive receptors and the application site, considering, noise, odour and air quality, and screen planting, and based on realistic assumptions for the current and approved waste activities as well as those subject to this application.
- A2.14 As highlighted above, the potential impact of the ERF and WSTF proposals on the adjacent strategic housing area has been considered in the design process. The proposed buildings, site layout and proposed mitigation measures reflect this consideration of the relationship.
- A2.15 The cumulative impacts of the two projects together (the ERF and WSTF plus the new community) on the baseline has been addressed in the ES at an appropriate high level. However, the potential impact of the ERF and WSTF on the new community has not been addressed directly in the EIA because the plans for the new community are not yet fully formed. Whilst there is an outline planning application submitted for the new community this seeks approval only for broad parameters, not a full detailed master plan. The timing of the implementation of the new community is uncertain and the layout and disposition of land uses is not yet approved, and ought to take account of the safeguarding of the existing and proposed waste uses in adopted planning policies.
- A2.16 In this context, the noise assessment of the ERF and WSTF proposals should be considered by the new community developers in determining the layout of the new community, to ensure that no new homes are proposed in areas that will be subject to significant noise effects. Similarly other aspects of the ERF and WSTF proposals and the ES findings should be considered in the design and layout of the new community to ensure that the safeguarding policies are properly accounted for.

Appendix 3

Section 106 agreement draft heads of terms

Lorry routing:

- written details of the prescribed route to be provided to all HGV drivers, including details of prohibited roads, and site speed restrictions
- provide a plan showing the route
- signage of the prescribed route
- details of the prescribed route to be placed on company websites
- restrictions and exceptions on use of prohibited roads
- complaint procedures
- logging and reporting complaints and actions taken.