

# Comment for planning application WSCC/036/20

Application number

WSCC/036/20

Name

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Type of Comment

Objection

Comments

PROPOSED WASTE INCINERATOR AT FORD Planning Application WSCC/036/20 EFW Plant (Incinerator) at Ford by Grundon and Viridor - July 2020 Objection and comments from A.J. Lovell MSc. C.Eng, FICE FiHT (Retired) Initial remarks: 1. This is a major application by anybody's standards and is of sub regional significance as its various impacts will be felt over a very wide area. 2. It is a very complicated application as demonstrated by the large number of papers submitted in support of the application. For this reason I suspect that very few people will spend the time to go through it all in detail as they will be put off by the time and work involved. This will work in the applicant's interest as it will undoubtedly reduce the number of objections submitted, but that should not be interpreted as a broad acceptance of the proposals by the local community. 3. For myself I have restricted my appraisal to Chapters 1 to 3 of the submission, which I believe contain the main gist of the scheme; and also to a earlier review of the consultation paper produced in March 2020. 4. I would also comment that I think it is significant that no action has been taken to implement the current planning approval given by WSCC in 2015 (on a single casting vote!). I now believe that this application was simply a 'sprat to catch a mackerel' and establish the use of this site so that a far larger application could be made at a later date. This application is that larger one, but if approved could well lead to a further expansion of the facilities in years to come. Regrettably, this is how many development companies operate. 5. The key headings of my objection are as follows : - suitability of location - scale and height of building - traffic movements - access roads - potential environmental impacts Location: The proposed site is surrounded by an area that is largely rural farming country with the relatively small villages of Climping, Yapton, Ford and the western fringes of Littlehampton close by. It also abuts the Rudford Industrial estate but this is quite small and has no major businesses, certainly nothing anything like the scale of what is now proposed. In addition, and significantly, we have the proposed 1500 home residential site planned for the Ford Airfield which is immediately adjacent to the Incinerator site. Thus the whole surrounding area may be characterised as semi rural, though the new airfield will change that to some extent. It is also adjacent to the South Downs Country Park and close to the historic town of Arundel. The new building is of such a size (see next point) that it will be visible for many miles and will be the dominant feature in the views from the south downs, just as Arundel Castle and Cathedral are from the south at the moment. But what a hideous comparison that would be! Scale and height of buildings: The quoted size of the main operational building is: Length - 176.5 metres, width - 134.2 metres , height 51.2 metrs, plus stack (chimney) 85 metres tall. This is just the main building, not the whole site which far larger. The height of the main building is actually about 159 feet, which is about the same as a 16 storey high block of flats. The height of the chimney is about 263 feet tall or about the same as a 26 storey block of flats. They estimate that it will take around 5 years to construct it and there can be no doubt that a building of this size will dominate the views of the whole area which is currently unspoiled by anything tall, which helps to retain its rural character. The visual impact of this new building would totally change that and damage the character of the whole surrounding area and all the villages within it. Traffic movements and access roads: First we must recognise that waste material would be imported not just from West Sussex, but also from all the surrounding Counties listed in the submission as: East Sussex, Hampshire, Surrey and the major towns of Portsmouth, Southampton and Brighton. So some vehicles will travel quite long distances through West Sussex in order to bring their waste to be processed in this relatively quiet corner of this county. That makes no sense at all unless you are the company deriving its profitability from such a wide catchment area. And then there is the future? We have already seen how the applicant will ask for one permission and later seek to upgrade it to something larger. Whilst WSCC could well turn down a future expansion, who can tell what a future planning appeal decision might bring? The application estimates the lorry numbers to be about 240 hgvs a day ,but I believe this to be the same figure as that given when the earlier permission for a much smaller plant was granted. Using a scaling up from the earlier waste tonnage to the proposed 295000 tonnes per year (275000 + 20000 recycling) I would estimate that the daily number of lorries could well be much larger than the applicant's estimate of 240, to perhaps 400 hgvs each day onto an unclassified country road. In addition there would be the ordinary vehicle movement of staff (40 people on 4 shifts per day) and the visitors which might include coaches for schoolchildren or other visitor groups. All of this makes the operator's traffic estimates look very questionable and could make the traffic impact very much heavier than they claim. Road access: The only road access suggested by the applicant (or indeed possible) is via the A259 and Church Lane. They make no proposals whatsoever to improve the local road infrastructure apart from improving the junction of their plant access road onto Church Lane. Ford road/Church Lane is a road which runs through the heart of Climping providing the main local route for private cars, cyclist, pedestrians and cyclists to the local church, playing field, two

community halls and the local school, and of course the wider area. The road currently has a 40mph speed limit which is constantly exceeded at off peak times (we have the speed monitoring figures to prove that with a maximum measured speed of an unbelievable 100mph recorded one afternoon). During the evening peak period the restricted capacity at the roundabout junction with A259 causes extensive southbound queuing in Church Lane which can extend as far back as Ford Prison and causes extensive delays and air pollution. Church Lane currently has a single, narrow footpath only on the east side and no crossing facilities at all. When large vehicles pass close by a pedestrian there is a frightening suction effect which makes it feel very unsafe. Cyclists also use the footpath as the narrow carriageway is not safe for them. Then we have the dangerous junction of Church Lane with Horsemere Green Lane which is frequently used as a cut through by traffic going to the Rudford Estate and also by drivers wishing to avoid the dangerous junction at the Oyster Catcher. This junction is considered dangerous because of its poor visibility in either direction for vehicles emerging from HGL, combined with the potential speed of traffic on Church Lane. Most collisions that occur here are 'damage only' so are not recorded on official statistic, but there are plenty of them. As members of the planning committee read these notes (as I hope they will) there can be little doubt about the unsuitability of the road as the main access to a new waste facility generating so much hgv traffic. This factor alone should be enough to justify a refusal. Potential environmental impact: It is widely recognised that the incineration of all kinds of commercial waste produces a range of noxious gases and also highly toxic dioxins. The applicant stresses how their plant will have the latest technology to clean and filter out all of these things which are damaging to both humans and the environment they live in. This maybe so, or it may not be, but it is apparent that a 160 foot high chimney is required to try and get the emissions away from the surrounding area. I suspect that wind changes could have quite an effect on that. And what would happen if there is a plant failure, maybe one that is not spotted straight away? Or if the monitoring is not quite up to scratch? Clearly there are further questions to be raised but why would you put a plant like this so close to many residential areas? Conclusion: I think it should be clear by now to all who read this that this vast new waste incinerator is totally unsuited to the location the its promoters have chosen for it. This is why I am objecting strongly to it on what I believe are solid planning reasons. Any one of the above points ought to be enough for a rejection on their own, but when added together the logical decision must be for a rejection. I do so hope we are not let down! 24 July 2020

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Attachments